



Irish Wind Energy Association,
Sycamore House,
Millennium Park,
Osberstown,
Naas,
Co. Kildare.

Senior Planner
Forward Planning Section
Planning Department
Roscommon County Council
Courthouse
Roscommon

Date: 6th September, 2012

By email: forwardplan@roscommoncoco.ie

Draft Variation No. 2 Roscommon County Development Plan 2008 - 2014

Dear Sir/Madam,

IWEA welcomes the opportunity to comment on the proposed Variation No. 2 to the Roscommon County Development Plan (RCDP) 2008 – 2014.

Roscommon County Council has adopted a very progressive outlook on the renewable energy sector. IWEA would like to commend the Council for their continued support to the renewable industry.

Yours sincerely,

**sent by email, bears no signature*

Caitríona Diviney
Chief Operating Officer
Irish Wind Energy Association

IWEA Submission on the Draft Variation No. 2 Roscommon County Development Plan 2008
- 2014

Introduction

Renewable energy development is a vital part of Ireland's strategy to tackle two major challenges facing us today – ensuring a secure supply of energy and combating climate change. Climate change is fast becoming a more important national and international issue. The availability of significant natural resources provides County Roscommon, due to its geographic location in the West Region and its high average wind speeds, with the opportunity to make a meaningful contribution to this issue while delivering a cleaner local environment. Wind energy produces indigenous renewable electricity while reducing greenhouse gas emissions by displacing traditional fossil fuels.

Proposed Variation No. 2

Chapter 3: Infrastructure, Transportation and Movement

Section 3.2.1 National Policies

There has been a number of policy documents published in recent years relating to targets for renewable energy developments which the policies of the County Development Plan should align with. **IWEA welcomes the additional listings proposed under the Variation No. 2 at section 3.2 "Policy Context" in particular the National Climate Change Strategy 2007 – 2012.**

We recommend that the following are also listed within the Policy Context notably:

- **The Government Energy White Paper March 2007**, where a target of 33% for renewable energy generation by 2020 is set;
- **The European Renewables Directive (2009/28/EC)**, on the promotion of renewable energy sources which establishes a binding target of 20% of overall EU energy consumption coming from renewable sources by 2020; and
- **The National Renewable Energy Action Plan (NREAP) 2010**, the NREAP was prepared as a result of Directive 2009/28/EC. It sets out the Government's strategic approach and measures to deliver on Ireland's target of 16% of the national gross final consumption of energy comprising energy from renewable sources by 2020 (under Directive 2009/28/EC).

Paragraph 2 states *"There are two binding targets for Ireland"* we would suggest that the following is inserted to read:

- 1) To deliver a 20% reduction, relative to 2005 levels, in greenhouse gas emissions, this target is to be reached by 2020 and excludes the sectors covered by the Emissions Trading Scheme **under the EU 2020 Targets for non-ETS sector emissions;**

- 2) To increase the use of renewable energy sources, ~~such as wind and wave power to 16%~~ **in order to achieve Ireland's target of 16% of national gross final consumption of energy to come from renewables by 2020 under Directive 2009/28/EC.**

Paragraph 3 states: *"Legislation in this area is due to be introduced in Ireland following EU Directive 2009/28/EC on the promotion of the use of energy from renewable sources. The Directive identifies a target for Ireland of 16% of its energy consumption to be from renewable sources by 2020. It also requires that at least 20% of Ireland's electricity be generated from renewable sources by 2020."*

IWEA notes that elements of Directive 2009/28/EC have been transposed under S.I. 147 of 2011 and S.I. 158 of 2012. We would also like to highlight to Roscommon County Council, under Article 4 of the European Renewable Energy Directive (2009/28/EC) each Member State was required to submit a National Renewable Energy Action Plan (NREAP). The published NREAP 2010 sets out the Government's strategic approach and measures to deliver on Ireland's target of 16% of the national gross final consumption of energy will comprise energy from renewable sources by 2020 across the electricity, transport and heat sectors (under Directive 2009/28/EC). In line with these commitments, the Government plans that by 2020 the overall binding target will be delivered by approximately 40% renewable electricity (RES-E), 12% renewable heat (RES-H) and 10% renewable transport (RES-T).

Section 3.11 Energy

IWEA welcomes the introduction of the Policies of the Regional Planning Guidelines for the Western Region to be incorporated into the County Development Plan. In particular we request the following policy of the Regional Planning Guidelines for the Western Region be incorporated.

EDP20: Support the region as a leader in research and development of sustainable renewable energy.

IWEA very much welcomes the opportunity to comment at this consultation stage and remains at the disposal of the forward planning department should you wish to contact us in relation to any issue.