



Irish Wind Energy Association
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Planning Department,
Meath County Council,
Abbey Mall,
Abbey Road,
Navan,
Co. Meath.

By email: countydevelopmentplan@meathcoco.ie

8th November, 2012

Dear Sir / Madam

**Re: Submission to the Proposed Amendments to the Draft Meath County Development Plan 2013 –
2019**

Further to The Irish Wind Energy Association (“IWEA”) submission to the Draft Meath County Development Plan 2013 – 2019 dated 3rd August 2012, we put forward the following comments on the Proposed Amendments. We very much welcome the opportunity to comment at this consultation stage and look forward to engaging constructively with you going forward.

Yours sincerely,
**sent by email, bears no signature*

Caitríona Diviney
Chief Operating Officer
Irish Wind Energy Association

IWEA Submission to the Proposed Amendments - Draft Meath County Development Plan 2013 – 2019

- 1. Proposed Amendment to Section 8.1.5:** *“The aim of this Development Plan is to promote a policy of preferential avoidance of siting wind energy projects in Natura 2000 sites, or sites that are on the flight lines of wintering birds unless it can be proven that there are no risks to the integrity of the sites (by carrying out Appropriate Assessment).”*

IWEA COMMENT: IWEA believes that there should be no blanket prohibition of development in Natura 2000 sites. The exclusion of these areas in the draft plan runs contrary to specific EU Commission advice on the implementation of Natura 2000 regulations which states that *“The Habitats Directive does not, a priori, exclude wind farm developments in or adjacent to Natura 2000 sites. These need to be judged on a case by case basis.”*¹

Assessment process enables the planning authority to assess if developments in Natura 2000 sites are likely to affect the integrity of the designation. Therefore IWEA believes that there should not be a blanket prohibition of development in Natura 2000 sites and projects should be considered on a case by case basis.

It should be noted that these sites are often the most suitable for wind farm development because of their wind resource potential, their remote location and their proximity to the large grid infrastructure projects.

- 2. Proposed Amendment to EC POL 16:** *“To require that the location of local energy ~~and communication~~ services such as electricity, ~~telephone, broadband and cable TV~~ be underground, ~~where possible~~. **where appropriate.**”*

IWEA COMMENT: IWEA reiterate to Meath County Council the importance of the development of grid infrastructure. The industry would like to ensure that the plan is not overly prescriptive and there is no prescribed direction to place the electricity infrastructure underground.

It is currently not the policy of the system operators to offer underground cable options instead of overhead power lines. There are many technical and operational difficulties that apply to underground cables which do not apply to overhead power lines.

- Overhead power lines can provide a more secure electricity supply than underground cables. Overhead lines are easier and faster to maintain and repair while underground cable faults can take weeks to repair may be difficult to locate and maintenance and repair is thus a much slower process.
- Trenching associated with underground cables has its own environmental and technical concerns and also from a technical point of view certain land types are not suitable/desirable for undergrounding cables.

The above is supported by an independent International Expert Commission Report on North South Interconnector published by Minister Pat Rabbitte in January 2012 in relation to overhead lines vs.

¹ http://ec.europa.eu/environment/nature/natura2000/management/docs/Wind_farms.pdf

underground cables², in which it was noted that “there is no single “right” solution. Each project must be judged on its own merits, and hybrid solutions, i.e. combining different technologies, have been applied in many cases, for instance partially undergrounding a link. A specific technical solution must be derived accounting for local conditions.” IWEA would like to reiterate that there should be no prescriptive requirements in relation to the undergrounding of infrastructure as this is often not the optimum solution.

3. Strategic Environmental Report, Appropriate Assessment Volume 4

IWEA recommended that a Renewable Energy Strategy is prepared within the lifetime of the County Development Plan 2013 – 2019 as opposed to investigating its preparation. While there has been no amendment to Objective EC OBJ 3, IWEA welcome the inclusion at section 4.4 of the Strategic Environmental Assessment, that Chapter 4 of the SEA Report will be reviewed to incorporate any relevant findings from the SEAI Wind Atlas into the baseline information for the County.

In preparing the Renewable Energy Strategy for the County we direct the Council to the SEAI publication “A Methodology for Local Authority Renewable Energy Strategies” to inform the preparation of the County’s Strategy.

Conclusion

IWEA hopes that this submission will inform the Meath County Development Plan 2013 - 2109. We remain at your disposal if you have any questions on our submission above or on the current wind energy development position in Ireland.

² <http://www.dcenr.gov.ie/Press+Releases/2012/Minister+Rabbitte+publishes+International+Expert+Commission+Report+on+North+South+Interconnector.htm>