



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

Planning Policy Unit,  
Cork County Council,  
Floor 13,  
County Hall,  
Cork.

Date: 4<sup>th</sup> March 2013

**Re: Cork County Development Plan Review**

Dear Sir/Madam,

The Irish Wind Energy Association ("IWEA") is Ireland's leading renewable energy representative body and as such has an active interest in the potential for renewable energy, and in particular wind energy, in County Cork. As the review will inform the vision, objectives and policies of the new plan for County Cork from 2015 including its Wind Energy Strategy, IWEA feels it is critically important to make a submission at this pre-draft stage. We very much welcome the opportunity and look forward to engaging constructively with you in the future.

IWEA would welcome the opportunity to meet with the Forward Planning Section to discuss our response in more detail at any stage.

Yours sincerely,

*\*sent by email, bears no signature*

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Caitríona Diviney  
Chief Operating Officer  
Irish Wind Energy Association

## **1.0 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. Wind energy produces indigenous renewable electricity while reducing greenhouse gas emissions by displacing traditional fossil fuels.

In recent years Ireland has become heavily dependent on the importation of fossil fuels in order to meet its energy needs. This high dependency on foreign energy imports is unsustainable and Ireland is currently extremely vulnerable both in terms of meeting future electricity needs and ensuring price stability. Accordingly, the Department of Communications, Energy and Natural Resources' (DCENR) energy policy has been moving towards greater levels of self-sufficiency, with renewable energy being a key part of the Government's Energy Policy Framework 2007-2020.

## **1.1 Targets**

Ireland's need to support renewable energy also stems from its EU commitments, namely EU Directive 2009/28/EC on the Promotion of Renewable Energy Sources which came into force in April 2009 and which establishes a binding target of 20% of overall EU energy consumption coming from renewable sources by 2020 as well as a binding 10% minimum target for energy from renewable resources in the share of transportation fuels. Ireland's target under the directive is for renewable resources to account for 16% of total energy consumption by 2020. Failure to meet these targets could result in EU sanctions. In line with these commitments, DCENR announced a revised target for electricity from renewable energy sources (RES-E) of 40% by 2020.

## **1.2 Economic Value**

Ensuring the security of energy supply is also a key part of the Government's *Framework for Sustainable Economic Revival*. Having regard to the current economic downturn, the framework acknowledges the need to put the energy/climate change agenda at the heart of Ireland's economic renewal. Every new wind farm development provides a substantial contribution to the local and national economy through job creation, Local Authority rates, land rents and increased demand for local support services in construction, operation & maintenance, legal and accounting and project management. More wind on the system will also result in lower and more stable energy prices for consumers while helping us achieve our energy and emissions targets.

## **1.3 DoEHLG Wind Energy Development Guidelines (2006)**

In June 2006, the Department of Environment, Heritage and Local Government (DoEHLG) published Wind Energy Development Guidelines for Planning Authorities under Section 28 of the Planning and Development Act, 2000, requiring planning authorities and An Bord Pleanála to have regard to them. The purpose of these guidelines is to provide advice to planning authorities on planning for wind energy through the development plan process. They also provide clarity to prospective developers and local communities.

#### **1.4 Projected Capacity**

As the vast majority of new renewable capacity will be provided by on-shore wind, the 40% target is a significant challenge for the Irish wind industry as a whole. As of December 28<sup>th</sup> 2012, the total capacity in the Republic of Ireland is 1738 MW generated from 159 wind farms in 22 Counties. There is a further 1601MW of wind farms that have accepted a grid offer via Gate 2 or Gate 3. Approximately 2,000 MW of wind capacity, will need to be installed on-shore in Ireland within the next 8 years if we are to meet our RES-E target. County Cork currently has a wind energy capacity of 282.98MW, and there are a number of permitted wind farms in the County and wind farm planning applications pending.

It should be noted that the large scale expansion of the Irish wind industry will be an extremely positive economic development for Ireland and will result in greater grid security and stability, job creation, rates and development contributions, lower energy prices and will bring about a reduction of GHG emissions.

This expansion in a relatively short period of time will present a considerable challenge for local authorities, not just in the processing of planning applications for wind farms and grid connections, but also in terms of identifying and zoning lands suitable for wind farm development.

In identifying suitable zones for development, regard should be had to, among others things, the level of the resource, the nature of landscape, and the status of the surrounding lands and the Department of the Environment's Wind Farm Planning Guidelines 2006.

#### **1.5 Efficiency**

Building larger and more efficient turbines mean fewer turbines overall. For some larger commercial turbines, a 10-15% increase in turbine height can increase the energy yield by up to 50%. These more efficient turbines increase our ability to meet targets, reduce the amount of turbines needed and reduce the amount of raw materials required. When delivering the least cost solution to society, the grouping or clustering of wind projects in relatively close proximity on sites with suitable resource is crucially important to reducing cost to both developers and consumers. Well planned cluster developments enable developers to achieve lower average connection costs and reduce the costs and timelines of infrastructure delivery for the Grid Operator.

In updating the Wind Energy Strategy for the County, reference should be made to the SEAI 2012 consultation document entitled "*A Methodology for Local Authority Renewable Energy Strategies*" for any updates to the energy strategy within the County Development Plan.

### **2.0 Specific Submission Proposals**

#### **2.1 County Cork Wind Energy Background County Development Plan 2015**

IWEA acknowledges the background documents prepared by Cork County Council and in particular the Energy document. We put forward the following for your consideration:

#### **Section 4.2**

*"4.2 Wind energy is the main focus of public policy for achieving the National Target of **20% of electricity** consumed from renewable energy sources by the year 2020 and*

*the planning authority recognises that of the many types of renewable energy, onshore wind development is best placed to deliver significant levels of renewably sourced electricity in the short to medium term.*

IWEA wishes to emphasise that Ireland's target for electricity from renewable sources by 2020 is **40%**, referenced most recently again in the DCENR Renewable Energy Strategy launched in 2012.<sup>1</sup>

#### **Section 4.26**

IWEA would suggest that in updating the Wind Energy Strategy for the County, reference should be also made to the proposed SEAI document entitled ***"A Methodology for Local Authority Renewable Energy Strategies"***<sup>2</sup> for any updates to the energy strategy within the County Development Plan.

#### **Section 4.49**

*"Siltation and nutrient loss from potential wind energy developments pose a significant risk to the pearl mussel population. It is suggested that these catchments **not** be excluded from consideration for on-shore wind, subject to mitigation of potential impacts (having regard to the River Blackwater Sub Management Plans, 2<sup>nd</sup> Draft, 2010 and any other sub basin management plans)."*

IWEA supports the proposal not to exclude these areas from consideration for on-shore wind as the risks to these species can be mitigated in many cases. IWEA has developed Best Practice Guidelines for Wind Energy development including details of construction management practices that provide for environmental protection and drainage management. Developments in these areas should be assessed in accordance with proposed mitigation measures proposed.

#### **Section 4.66**

***"North East Cork (including part of the Blackwater Valley):** Wind speeds in this area of attractive landscape are generally low and, at best, large scale wind energy development would be marginal from the economic perspective*

IWEA wishes to iterate that it is not correct to generally state that large scale wind energy development would be marginal in North East Cork. Advances in turbine technology increase the efficiency of wind energy projects and their commercial viability. The average European wind capacity factor is approximately 25% which is relatively low compared to the average Irish capacity factor of 31%. Ireland's wind speeds, even in lower wind speed areas are still higher than the European average where wind farms are commercially viable. With the continuing increase in hub heights and rotor diameter being offered by turbine manufacturers, the resource in less windy inland sites can also be efficiently used to generate electricity from wind.

#### **Section 4.61**

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<sup>1</sup> [DCENR Strategy for Renewable Energy 2012-2020](#)

<sup>2</sup> [A Methodology for Local Authority Renewable Energy Strategies 2012](#)

*"Nature Conservation Areas: Areas designated for nature conservation at national level (including SPA's, SAC's & NHA's) will generally be inappropriate for large scale wind energy development because of the likelihood of significant adverse effects on the integrity of those areas particularly in relation to areas designated for the protection of birds but also in other areas where the general effects of construction would be damaging".*

IWEA strongly recommends 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 in its Guidelines 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."*<sup>3</sup>

IWEA supports the position that projects must be assessed on their own merits, subject to the findings of the environmental impact assessment and appropriate assessment process

## **Conclusion**

IWEA considers that, to date, Cork County Council forward planning section has adopted a positive outlook on wind energy development and a comprehensive Wind Energy Strategy on which to build upon. We are therefore hopeful that the IWEA comments can be addressed in the new Plan, to ensure it will contribute to achieving the development of the wind resource in the County.

The inclusion of specific renewable energy policies and objectives in the new Plan will promote the further development of renewable energy which will enable Cork County Council to:

- Develop a sustainable, wind energy industry employing construction and professional service providers and attracting significant capital investment up to 2020;
- Enhance the vibrancy of the county;
- Support rural development in a sustainable manner;
- Deliver significant community benefit including the hedging against high fossil fuel prices and the provision of land lease payments to local landowners annually;
- Contribute to the funding of the construction of an electrical grid infrastructure that would be the basis of the new renewable energy industry; and,
- Deliver significant commercial rates revenue to County Cork annually.

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<sup>3</sup> [http://ec.europa.eu/environment/nature/natura2000/management/docs/Wind\\_farms.pdf](http://ec.europa.eu/environment/nature/natura2000/management/docs/Wind_farms.pdf)