



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

Draft Westmeath County Development Plan
Forward Planning,
Westmeath County Council,
County Buildings,
Mullingar,
Co. Westmeath.

by email: cdp@westmeathcoco.ie

Date: 12th April 2013

Re: Draft Westmeath County Development Plan 2014 - 2020

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 wind energy and related policies of the Draft Westmeath County Development Plan 2014 – 2020 (CDP). As the CDP will assist in the assessment of planning applications for wind energy developments and inform the subsequent decision making process up to 2020, IWEA feels it is critically important to comment on the Draft CDP 2014-2020. We very much welcome the opportunity to comment at this consultation stage and look forward to engaging constructively with you going forward. This submission follows on from our pre-draft submission dated 17th April 2012.

Yours sincerely,

**sent by email, bears no signature*

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.

This is recognised by section 10.3 of the Draft CDP.

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.

This is acknowledged by Section 10.3 of the Draft CDP.

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.

The potential for the creation of enterprise and employment from the alternative energy sector is recognised by P-EC8 of the Draft CDP.

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 and

in assessing planning applications for wind energy development. They also provide clarity to prospective developers and local communities. A number of sections of these guidelines are currently under review by the department and an update is expected by the end of 2013.

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 March 15th 2013, the total capacity in the Republic of Ireland is 1774 MW generated from 160 wind farms in 22 Counties. There is a further 1632MW 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 7 years if we are to meet our RES-E target.

County Westmeath currently has no installed wind energy capacity.

1.5 Efficiency

We would reiterate, that 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.

2.0 Specific Submission Proposals

2.1 Section 10.5 'Wind Energy'

Section 10.5, paragraph 1 of the Draft CDP states *"The development of wind power has accelerated over the last few years as the technology becomes more cost competitive."*

This in our opinion is an inaccurate and flawed statement. We put to Westmeath County Council that the growth of wind energy is due to meeting Ireland's obligatory EU Commission commitments, under the EU 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, not because technology has become more cost competitive.

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 security of our energy supply, job creation, lower energy prices and bring about a reduction of GHG emissions. One cannot underestimate the crucial role that the renewables industry is playing in the delivery of 2020 targets for Ireland, decarbonisation of energy supply and securing the country's future energy supply.

2.2 Wind Energy Development Capacity Map: Map Ref 4

We note that the under the current Development Plan (2008 – 2014) the Wind Farm Capacity map was prepared as follows: *"The County has been divided into 11 distinct*

landscape areas, these areas have been further assessed with regards to ability to contain wind turbines on the basis of topography, sensitivity of each area, location of grid connections, and special designations. As a result, the 11 character areas have been given a capacity rating (high/medium/low and none) to contain wind turbines.” Given that this Map forms the basis of Map Ref 4 of the Draft County Development Plan, we would ask Westmeath County Council as to whether wind speeds were considered when preparing the wind energy capacity areas, as no reference is made to wind speed.

IWEA note that the Wind Energy Development Capacity Map (Map Ref 4) contained within the Volume 2 of the Draft County Development Plan 2014 - 2020 has been revised removing the boundaries of “Potentially Suitable Areas” and removing the “High Capacity” tier from the designations. Landscape area no. 10 has been reduced from Medium Capacity to Low Capacity under this Draft Development Plan.

As a major stakeholder in the wind energy sector, we consider Westmeath County Council are in the process of adopting a very conservative approach to wind energy development for the County based on the removal of the “potentially suitable areas” & the “high capacity” tier designation for wind farm development as set out on Map 4. If Ireland is to meet its national targets and its international obligations, it is essential that all Counties develop a well designed wind development strategy with reasonably defined wind energy designations, to appropriately guide our future up to 2020, covering the lifetime of this plan.

IWEA recommend that a Renewable Energy Strategy is prepared within the lifetime of the County Development Plan 2014 – 2020. 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.

2.3 Section 10.5.2 Industrial Scale Wind Farms

The current policies on renewable energy and resources in the Draft Westmeath County Development Plan 2014-2020 (P-WIN1 – P-WIN5) are generally supportive of wind energy development but it is considered that there is more that could be done in order to realise the full potential with the County.

Policy-WIN2 states

“To direct large-scale energy production projects, in the form of wind farms, onto cutover cutaway peatlands in the county, subject to environmental, landscape, habitats and wildlife protection requirements being addressed”

Paragraph 10.5.2 states

“The preferred locations for large scale energy production, in the form of wind farms, is onto cutover cutaway peatlands in the county, subject to nature conservation and habitat protection requirements being fully addressed”

The Regional Planning Guidelines for the Midlands 2010-2020 does not confine wind energy development to cutaway boglands but acknowledges the potential of these areas. IWEA consider that there should not be a presumption to direct wind energy proposals to the *cutover cutaway peatlands*. We consider such a policy restrictive and by doing so, Westmeath County Council will clearly limit its capacity for wind energy development. Ruling out what could be suitable sites on an arbitrary basis could hinder our ability to meet our

ambitious but necessary and legally binding EU renewable energy and EU climate change commitments. We put forward that opportunities could be missed should wind energy developments outside these peatland areas be dismissed particularly if it can be demonstrated by an Applicant that a wind farm is suitable for an area. Each application should be assessed on a case by case basis in line with trusted policy and guidance.

2.4 Section 14.11.1 Wind Power

Section 14.11.1 lists a number of criteria in which wind energy applications will be assessed against, one of which is *“the density of the residential development in the area”*. We put to Westmeath County Council that density of residential development should not be factor within the assessment of a wind farm application. Should it be demonstrated that a wind farm can adhere to the technical limits and values set for noise and shadow flicker at receptors the issue of residential density should not be a factor.

3.0 Conclusion

While the broad support for wind energy projects by Westmeath County Council is to be welcomed, a far less conservative approach to new development is required in order for the County to maximize its true potential. We encourage the Local Authority to prepare a detailed Wind Energy Strategy as part of the Draft CDP. In preparing such a 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.

If Ireland is to meet its national targets and its international obligations, it is essential that all Counties develop a well designed wind development strategy.

ⁱ A Methodology for Local Authority Renewable Energy Strategies 2012