



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

Mr Tom O'Dwyer,
Administrative Officer
Planning Department,
South Tipperary County Council,
County Hall, Emmett Street, Clonmel,
Co. Tipperary
or via e-mail to planning@southtippcoco.ie

Date: 22nd March, 2013

Re: RES for South Tipperary 2013

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 South Tipperary. As the RES will inform the vision, objectives and policies for the County from 2013, IWEA feels it is critically important to make a submission at this preparation 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*

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 and particularly relevant to the on-shore wind energy resource, 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 provide a hedge against rising fossil fuel prices, resulting 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 target of 40% of electricity from renewable energy is a significant challenge for the Irish wind industry as a whole. As of December 28th 2012, the total capacity in the Republic of Ireland is 1,738 MW, generated from 159 wind farms, in 22 Counties. There is a further 1,601MW of wind farms that have accepted a grid offer within the Gate 2 or Gate 3 grid connection process. Approximately 2,000 MW of new 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. South Tipperary currently has a wind energy capacity of 63.66MW installed, 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 enough lands suitable for wind farm development.

In identifying suitable zones for development, regard should be had to the existing pattern of development, 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 preparing the RES 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 of the County Development Plan.

2.1 Wind Energy policy for South Tipperary Renewable Energy Strategy 2013

To date, South Tipperary County Council planning section has adopted a positive outlook on wind energy development through the identification of wind energy policy areas, comprising maps and policy statements in Appendix 3 of the current County Development Plan. This has already initiated active wind energy development in the County. Positive, proactive policy statements in the new Renewable Energy Strategy document will secure the current developments and promote the further development of wind energy which will enable South Tipperary County Council to:

- Develop a sustainable wind energy industry employing construction and professional service providers and attracting significant capital investment;
- Enhance the vibrancy of the County through the support of rural development in a sustainable manner by delivering community benefit through a community benefit payment and land lease payments to local landowners annually; and,
- Deliver significant commercial rates revenue to South Tipperary annually.

2.2 Conclusion

IWEA considers that South Tipperary County Council forward planning section has so far adopted a positive outlook on wind energy development in the county. IWEA is therefore hopeful that this will continue in the new RES, to ensure it will contribute to achieving the development of the wind resource in South Tipperary.