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Mr. Tom O'Dwyer,
Administrative Officer
Planning Department,
South Tipperary County Council,
County Hall, Emmett Street, Clonmel,
Co. Tipperary

planning@southtippcoco.ie

Date: 16th December, 2013

Re: Draft South Tipperary Renewable Energy Strategy

Dear Sir,

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 new renewable Energy Strategy for South Tipperary will inform the renewable energy vision, objectives and policies for the County from 2015, IWEA welcomes the opportunity afforded now to comment. IWEA would welcome the opportunity to meet with the Forward Planning Section to discuss our response to the Draft RES in more detail at any stage.

Yours sincerely,

**sent by email, bears no signature*

Caitríona Diviney
Chief Operating Officer
Irish Wind Energy Association

**IWEA submission on the
Draft Renewable Energy Strategy for South Tipperary**

IWEA wishes to comment as follows on the Draft RES:

Section 6.0 - Renewable Energy Benefits & Supports

6.1 Economic benefits of RE production

This section of the RES highlights the employment potential of the renewable energy sector for South Tipperary. It is recognised that there is *potential employment in renewable energy production associated with the manufacture of products and the construction and installation phase, with the other important area being the operations and maintenance of plants and systems. From a long term perspective the operation and maintenance of renewable energy facilities offers the greatest potential for employment to the county.* It is stated that *anaerobic digestion offers the greatest employment opportunity and that biomass will also have a big impact as the operation and maintenance phase is more labour intensive than the construction and installation phase.*

IWEA suggests that the jobs potential and local economic benefit of wind energy projects is being undervalued.

The Government's White Paper on Delivering a Sustainable Energy Future for Ireland 2007-2020 states that wind energy will play a pivotal contribution to meeting the *40% electricity from renewables by 2020* goal. The National Renewable Action Plan submitted to the European Commission anticipates that wind energy projects will make up most of the renewable portfolio required to meet our legally binding targets by 2020. This will result in substantial project investment in civil and project engineering, legal and accounting services, electrical and mechanical servicing, land lease payments and local authority development contributions and rates payments and on-going investment in operations and maintenances services and supplies.

There is significant cost associated with the installation of wind energy, with typically 25% to 30% of the capital investment being spent locally/regionally. Capital investment for every installed MW capacity of on-shore wind in Ireland is approx. €1.5 - €1.7m/MW. This equates to approximately €450,000 of the investment per MW, which contributes to project construction including professional services which would be sourced both regionally and nationally. Additionally indirect and ancillary service industries in the locality of the wind farms would benefit from the construction, operation and maintenance of the windfarms.

Windfarm projects already pay substantial commercial rates to South Tipperary Local Authority and these rates are used to implement the local authority development programmes. There are also local benefits through substantial long term lease payments to landowners. These land lease payments would be expected to be spent

locally. There will be local employment and skills upgrading benefits in the operation and maintenance of the constructed windfarms.

Section 7.0 – County Renewable Energy Strategy

7.3.2 Wind

Commercial Wind Farm and individual on-site large turbines

The current South Tipperary Wind Energy Strategy was incorporated into planning policy as part of the County Development Plan in 2006. It is proposed in the Draft RES 2013, that the current wind energy areas, as identified in the wind energy strategy, should be maintained until RES is reviewed in 2020. In these circumstances, and in order to continue with the successful development of wind energy projects in the County, IWEA submits that the policy for the areas identified as **Preferred** in Appendix 3 of the draft RES, should now be categorised as **Strategic** where it is policy that new developments and extensions to existing developments will normally be permissible within acceptable environmental and planning constraints. Proposals for lands in a buffer zone just outside the Preferred Areas, within the usual constraints, should also be considered favourably.

Conclusion

To date, South Tipperary County Council forward planning has adopted a positive outlook on wind energy development through the identification of viable wind energy policy areas. This has already created active wind energy development in the County. Positive, proactive policy statements for the Preferred Areas and lands contiguous to the Preferred Areas, will secure the current developments and promote the further development of wind energy in these areas 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.