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

Forward Planning,
Louth County Council,
Forward Planning Unit,
Millennium Centre,
Dundalk,
Co. Louth.

By email to countyplan@louthcoco.ie

Date: 10th January 2014

Re: Review of Louth County Development Plan
"County Louth's New Development Plan 2015 – 2021 Issues Paper"

Dear Sir/Madam,

The Irish Wind Energy Association ("IWEA") welcomes the opportunity to participate in the pre-draft stage of the Louth County Development Plan 2015 - 2021. As this document will aim to direct the future growth of County Louth over the medium to long term and assist in the assessment and decision making of planning applications for wind energy developments, IWEA very much welcomes the opportunity to comment at this early consultation stage and remain at the disposal of the forward planning department should you wish to contact us in relation to any issue.

IWEA made a submission to the issues paper for the *"Renewable Energy Strategy for County Louth"* dated 6th March 2013. We reiterate the comments made in that submission as they are applicable to this pre-draft county development plan submission.

Yours sincerely,

**sent by email, bears no signature*

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Caitríona Diviney
Chief Operating Officer
Irish Wind Energy Association

1 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, with such fuels accounting for 86 % of electricity generation in Ireland. 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.

2 Targets

Ireland's need to support renewable energy also stems from it's 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.

3 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 the end of 2013 the total capacity in the Republic of Ireland is 1844MW generated by 170 wind farms. Further there is over 3500MW of wind farms that have accepted a grid offer or have a live offer via Gate 3. Approximately 2000-2500 MW of wind capacity, will need to be installed on-shore in Ireland before 2020 if we are to meet our RES-E target.

County Louth only has **4.7MW** wind energy capacity installed.

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.

4 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

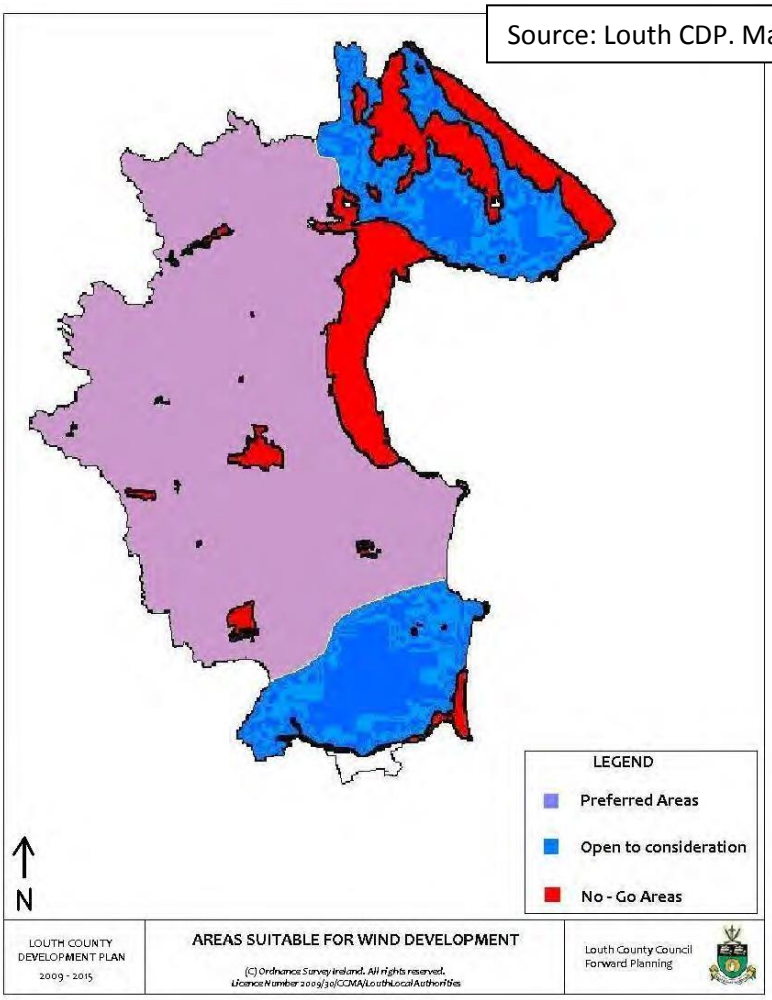
amount of turbines needed and reduce the amount of raw materials required. When delivering the least cost solution to society, the grouping or clustering of wind projects in relatively close proximity on sites with suitable resource is crucially important to reducing cost to both developers and consumers. 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.

5 Louth County Development Plan 2009 - 2015

The current polices on renewable energy and resources in the Louth County Development Plan 2009-2015 are generally supportive of wind energy development but it is considered by IWEA that there is more that could be done in order to realise the full potential within the County. Map 9.1 "*Areas Suitable for Wind Energy Development*" in the current County Development Plan 2009 - 2015 categories the County into 3 zones:

- Preferred Areas
- Open to Consideration
- No-Go Areas

Source: Louth CDP. Map 9.1



IWEA would suggest that when reviewing the existing wind energy designations, reference should be made to the SEAI document entitled ***"A Methodology for Local Authority Renewable Energy Strategies"*** for the future County Development Plan. Under this review, regard should be had to, among others things, the level of the wind resource **but** also the

continuing increase in hub heights and rotor diameter being offered by turbine manufacturers, as the resource in less windy inland sites can also be exploited. Other factors include the nature of landscape, and the status of the surrounding lands and the Department of the Environment's Wind Farm Planning Guidelines 2006 (currently under a targeted review).

The pending Louth Renewable Energy Strategy should set out the strategy for renewables in County Louth and in-turn should assist in setting the objectives and policies of the Louth County Development Plan 2015.

6 Louth County Development Plan 2015 – 2021 Issues paper

The Issues Paper asks the 2 questions in relation to wind farms, we put forward the following:

"Do you agree with commercial wind farms?"

As set out at Section 2 of this submission, Irelands target for electricity from renewable energy sources (RES-E) is 40% by 2020 and we are **bound** by EU Directive 2009/28/EC which **establishes a binding target** of 20% of overall EU energy consumption coming from renewable sources by 2020. It is widely recognised and accepted that the vast majority of new renewable capacity within Ireland will be provided by on-shore wind farms. The emissions avoided from wind in 2012, have been calculated by the SEAI in their "Energy in Ireland 2013 Report" to be 1,931 kt CO2.

IWEA wishes to emphasize 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.[1]

Wind energy is a clean source of energy. It can be harnessed without damaging the environment, unlike with conventional energy such as fossil fuels, which release carbon dioxide and other harmful pollutants into the atmosphere. Increasing the use of RE is therefore a key strategy for local authorities to reduce GHG emissions and assist in Ireland meeting its Kyoto commitments. The use of renewable energy avoids GHG emissions contributing to climate change and associated habitat destruction and species displacement, and also displaces the environmentally damaging effects of fossil-fuel extraction and processing[2]

"Where should they be located?"

IWEA wishes to iterate that the optimum siting of wind farm developments is in an area where there is a **sufficient wind resource**, where an appropriate separation distance from the nearest residences can be achieved and where the land area is large enough to accommodate the modern larger turbines which require significant separation distance from each other. However 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 exploited.

7 Grid Infrastructure

[1] DCENR Strategy for Renewable Energy 2012 - 2020

[2] A Methodology for Local Authority Renewable Energy Strategies 2012

IWEA would like to highlight 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.

8 Conclusion

The inclusion of specific renewable energy policies and objectives in the new County Development Plan will promote the further development of renewable energy which will enable Louth 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 Louth annually.

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