

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

Administrative Officer,
Planning & Development,
Wicklow County Council,
County Buildings,
Wicklow Town.

By email: to planreview@wicklowcoco.ie

Date: 26th February 2014

Re: Proposed Variation No. 4 to County Wicklow Wind Energy Strategy

Dear Sir/Madam,

The Irish Wind Energy Association ("IWEA") welcomes the opportunity to comment on the **Proposed Variation No. 4 to County Wicklow Wind Energy Strategy**. As the Wind Energy Strategy will aim to direct the future growth of County Wicklow over the medium to long term and assist in the assessment and decision making of planning applications for wind energy developments, IWEA welcomes the opportunity to comment on the proposed variations and remain at the disposal of the forward planning section should you wish to contact us in relation to any specific aspect of this submission.

IWEA would like to reiterate that we welcome Wicklow's County Council's positive support of renewables and wind energy in particular. 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.

Yours sincerely,

*sent by email, no signature required

Caitríona Diviney

Chief Operating Officer
Irish Wind Energy Association

1.0 Introduction

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 sustainable energy. IWEA is committed to promoting the use of wind energy in Ireland and beyond as an economically viable and environmentally sound alternative to thermal or nuclear generation and promotes awareness and understanding of wind power as the primary renewable energy resource.

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. IWEA supports proper planning and sustainable development and recognises that development of wind energy projects must afford clear protection to residents while enabling Ireland to develop our huge natural clean energy renewable resources and meet our EU2020 targets. IWEA members are involved in developing more than 85% of the wind farm capacity that is planned to be built from now to 2020.

While we welcome all of the Policies and Objectives of County Wicklow Wind Energy Strategy in the manner in which they seek to demonstrate Wicklow County Council’s recognition of the importance of renewable energy, we have grave concerns regarding the impact the new proposed variations will have on Wicklow County Council’s ability to contribute towards the national renewable energy targets. We therefore request that the contents of this submission are taken into serious consideration by Wicklow County Council.

1.1 EU commitments and DCENR’s RES-E target

In the first instance, we wish to remind Wicklow County Council of 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. The European Union is also now in the process of agreeing a further series of targets for renewable energy towards 2030.

1.2 Benefits of wind energy development to Wicklow County Council

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. Another approximately 2,000 MW of additional wind capacity will need to be installed on-shore in Ireland within the coming years if we are to meet our 2020 RES-E target. The expansion of the Irish wind industry will be an extremely positive economic development for Wicklow County Council and can result in greater grid security and stability, job creation, Local Authority rates and development contributions, and will bring about a reduction of GHG emissions.

2.0 Proposed Variation 4.1

“To so vary the Wind Energy Strategy such that more emphasis is placed on the landscape vulnerability; in particular:

- (a) All lands designated ‘Area of Outstanding Natural Beauty’ currently in the ‘Most Favoured’ category of the Wind Energy Strategy be re-designated ‘Not Favoured’, and*
- (b) All lands designated ‘Area of Special Amenity’ currently in the ‘Most Favoured’ category of the Wind Energy Strategy be re-designated ‘Less favoured’.*

This proposed variation is embodied by changes to Map No. 05 of the Wind Energy Strategy

Reason: It is considered by Wicklow County Council that the Wind Energy Strategy adopted in 2010 did not adequately take account of landscape vulnerability as described in the Wicklow Landscape Characterisation designations”.

The proposed change to the land designations contradicts an original statement in the Wicklow County Development Plan 2010-2016, Volume 2 – Wind Strategy Appendix 1:

“The fact that any area is located in a particular landscape zone or is subject to views or prospects would not in itself render the area unsuitable to wind farms. However, where an area is particularly sensitive and vulnerable in these regards, it must be considered less favourable to exploitation and more difficult to develop given the constraints that would be faced in the siting and design of any development”.

The existing wording in the current plan offers wind energy developer’s opportunities to address any potential landscape impacts during the EIA process. However, the revised designations will prohibit and stunt wind energy growth in County Wicklow.

The revised designations have more than halved Wicklow’s suitable area for wind energy development. This again contravenes the SEA screening report which stated; *“by reducing the area of the County where the development of wind turbines would be considered favourably, there may be a reduction in the ability to exploit renewable energy sources, thereby maintaining dependency on non-renewable fuel sources, with the resulting potential adverse impacts on landscape, due to fossil fuel extraction”.*

The SEA screening report also goes on to explain that this is not the case in Wicklow and the county explicitly favours (in varying degrees) the exploitation of wind resources on c. 56% of the land area of Wicklow county. However, when you closely examine the areas designated as “most favoured”, you will find the majority of these areas are highly populated towns and villages for example Wicklow and Delgany, so not normally, after separation distance from housing is factored in, viable.

The proposed variations contravene the Sustainable Energy Authority of Ireland (SEAI) Methodology for Local Authority Renewable Energy Strategies (LARES). It is a nationally acknowledged guidance document whose steering group members include representatives from the Department of Environment, Community and Local Government, the Department of Communications, Energy and Natural Resources, the Local Authorities and the Irish Planning Institute amongst many others. Section 3.4.2.3 of that guidance document suggests, inter alia, that the development of plans and planning guidelines contain positive policies and objectives relating to renewable energy (RE) and renewable projects within the local authority area in relation to:

“Identification of key locations where RE could be deemed acceptable in principle, subject to criteria such as design and landscape planning, natural heritage, environmental and amenity considerations – maps showing suitable areas could be incorporated into the CDP”.

This methodology is recognised as a best in class approach to the preparation of Renewable Energy Strategies (RES).

It is submitted that this proposal under variation 4.1 **counteracts Objective WE1** of the County Development Plan which states that:

“WE1: To encourage the development of wind energy in accordance with the County Wicklow Wind Strategy and in particular to allow wind energy exploitation in most locations in the County subject to:

- *consideration of any designated nature conservation areas (SACs, NHAs, SPAs etc.) and any associated buffers*
- *impacts on visual, residential and recreational amenity*
- *impacts on ‘material assets’ such as towns, infrastructure and heritage sites*
- *consideration of land cover and land uses on or adjacent to the site*
- *consideration of grid connection issues*
- *Best practice in the design and siting of wind turbines, and all ancillary works including access roads and overhead cables”.*

The result of which is that Wicklow County Council are **failing to meaningfully guide renewable energy developments** to the appropriate areas of the county.

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.

3.0 Proposed Variation 4.2

“To so vary the Wind Energy Strategy by adding the following text under the description of ‘Most Favoured’ areas for wind farm development:

“In particular, due regard shall be taken of listed views and prospects and any development that would contravene objective VP1 of the Plan¹”

¹ *To protect listed views and prospects from development that would either obstruct the views & prospects from the identified vantage point or from obtrusive or incongruous features in that view/prospect. Due regard will be paid in assessing development applications to the span and scope of the view/prospect and the location of the development in that view/prospect*

Reason: It is considered by Wicklow County Council that the Wind Energy Strategy adopted in 2010 did not adequately take account of views and prospects listed in the Wicklow County Development Plan”.

IWEA welcome the variation as during the EIA process, all listed views and prospects are taken into consideration, the wind farm is designed not to negatively impact on a listed view or prospect. However, we ask that Wicklow County Council do not prohibit appropriate development that in their opinion contravenes Objective VP1.

4.0 Proposed Variation 4.3

“To so vary the Wind Energy Strategy by including the following text under Section 3:

All applications for wind turbines with a rotor diameter of 50m or less shall include a detailed assessment of noise and shadow flicker impacts on all residences within 500m from any turbine. Applications providing for a rotor diameter in excess of 50m shall include a detailed assessment of noise and shadow flicker on all residences within a minimum radius of 10 times the diameter of the rotor e.g. a wind turbine with a rotor diameter of 65m will be required to carry out an assessment of impacts on all residences within a minimum 650m radius of any turbine.

Reason: It is considered by Wicklow County Council that the Wind Energy Strategy adopted in 2010 did not adequately take account of impacts on residential amenity arising for noise and shadow flicker effects and in particular, the fact that turbine size is increasing results in more extensive impacts than previously envisaged”

IWEA have strong concerns regarding the proposed assessment of noise on all residences within a minimum radius of 10 Rotor Diameter. No national policy requests assessments for noise within a 10 RD radius of a residence and IWEA feel that Wicklow Council should refrain from imposing such revised conditions in light of the ongoing Department of the Environment revision of the Wind Farm Planning Guidelines.

The current Wind Energy Guidelines 2006 state: *“In general, noise is unlikely to be a significant problem where the distance from the nearest turbine to any noise sensitive property is more than 500 metres. Planning authorities may seek evidence that the type(s) of turbines proposed will use best current engineering practice in terms of noise creation and suppression.”*

5.0 Conclusion

IWEA are deeply concerned to see that Wicklow County Council’s is proposing to:

- Disregard National Policy in the treatment of wind energy in the county;
- Significantly reduce “most favoured” and “less favoured” areas for the development of renewable wind energy;

All of these proposed variations will significantly reduce any potential for future wind energy development in County Wicklow. IWEA would like to ask the council if this is the intended consequence of such proposals?

While we encourage variations to Wicklow County Council Wind Energy Strategy which from a policy and objectives perspective, appears to have the intention of promoting Renewable Energy Sectors, we have to strongly note that if the proposed variations are adopted which are **without substance, evidence or need**, they will have a significant impact on the development of wind energy projects and the delivery of Ireland's renewable energy targets.

Given the seriousness of the proposals presented IWEA would request an urgent meeting to discuss our concerns prior to any adoption of these proposed amendments.