



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

Forward Planning Section,
Cavan County Council,
Farnham Centre,
Farnham Street,
Co. Cavan.

Date: 17th April, 2014.

By email: plan@cavancoco.ie

Re: Amended Draft Cavan County Development Plan 2014-2020

Dear Sir/Madam,

IWEA is Ireland's leading renewable energy representative body representing more than 200 members involved in wind and renewable energy development in Ireland and Northern Ireland, and represents members with projects across the spectrum, in operation, under construction and awaiting connection.

IWEA members represent the full spectrum of the supply chain and currently employ more than 3,400 people in Ireland. They are involved in the majority of connected projects and more than 85% of the renewable energy required to deliver the 2020 targets. As such, IWEA has an active interest in the wind energy and related policies of the Cavan County Development Plan 2014 – 2020 (CDP).

IWEA made a submission to the "*Draft County Development Plan 2014-2020*" dated 17th October 2013. We reiterate the comments made in that submission as they are also applicable to this submission. It is noted that some of the matters raised in that original submission do not arise in the context of the proposed amendments, therefore this submission is focussed on the proposed amendments and we request that the contents of this submission be taken into serious consideration in the finalisation of the CDP.

Yours sincerely,

**sent by email, bears no signature*

Caitríona Diviney
Chief Operating Officer
Irish Wind Energy Association

IWEA Submission on the Amended Draft Cavan County Development Plan 2014-2020

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.

We commend Cavan County Council in their commitment outlined in point 4.7.3, to securing the maximum potential from wind energy resources commensurate with supporting development that is consistent with proper planning and sustainable development. Furthermore and in particular, we welcome the policy of the Planning Authority to adopt a favourable approach to wind energy developments.

Policy PIO117 Part 1 - Regional National and International Context

In terms of Section 1.5 and Policy PIO117 Part 1 of the proposed amendments, IWEA strongly welcomes the Council’s clear reference to the fact that the CDP has been drawn up to be consistent with, *inter alia*, the *Wind Energy Development Guidelines for Planning Authorities, 2006*.

In addition, IWEA welcomes the clear commitment that: *“The Local Authority will also ensure consistency with guidelines and policies from other government departments such as the ‘Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure’ issued by the DCENR”*.

Policy PIO117 Part 8 - Proposal on public rights of way

Policy PIO117 Part 8 proposes specifically in relation to wind energy developments to *“identify public rights of way and established walking route and maintain free from development and preserve them as public rights of way or walking routes”*. While IWEA acknowledges that existing public rights of way must be identified and preserved we are clear that development can accommodate or even enhance existing rights of way, and that such development can be carried out in a way that ameliorates existing public rights throughout the lifetime of the wind farm development.

Policy PIO117 Part 9 – Requirement to submit cumulative impacts of wind farm development proposals where relevant

Policy PIO117 Part 9 proposes that the consideration given in the assessment of wind farm development should include a cumulative impact assessment wherever relevant. In this context we wish to refer the Council to the IWEA Best Practice Guidelines for the Irish Wind Energy Industry (dated March 2012) which sets out the best practice approach that IWEA advocates in the context of assessing the cumulative impacts as part of Environmental Impact Assessments for wind farm developments.

Chapter 11 – Proposal to undertake a Wind Energy Strategy during the life time of the plan

IWEA wishes to strongly welcome Cavan County Council's stated objective to put in place a Wind Energy Strategy for the County during the lifetime of the plan. In this respect, IWEA wishes to request that the Council makes maximum use of the *Methodology for Local Authority Renewable Energy Strategies*, as developed by the Sustainable Energy Authority of Ireland (SEAI) in partnership with local Authorities. We would further encourage the Council to make reference to the proposed use of this methodology guidance tool (as appropriate) as part of the text in Chapter 11 on this subject matter.

Conclusion

IWEA considers that the Cavan County Council forward planning section has adopted a positive outlook on wind energy development and renewables to date and recognises that the enshrining of this commitment is further evidenced by the proposed amendments to the CDP for the period up to 2020.

In particular we wish to commend the council for its proposal to have regard to the *Wind Energy Development Guidelines for Planning Authorities, 2006* and its proposal to prepare a Wind Energy Strategy over the life time of the CDP.

The enabling of the development of a significant wind energy resource which can be harnessed will enable Cavan to facilitate the:

- Development of a sustainable, wind energy industry employing construction and professional service providers and attracting significant capital investment over the period to 2020;
- Delivering of significant rates revenue to County Cavan annually;
- Delivering of significant community benefit including land lease payments to local landowners annually;
- Contributing to the funding of the construction of an electrical grid infrastructure that would be the basis of the new renewable energy industry.

IWEA welcomes the proactive approach by Cavan County Council in the proposed amendments to the CDP to realise the wind energy development potential of the county. This policy approach will contribute to achieving the development of the wind resource in the county and ultimately help Ireland reach its 2020 renewable energy targets.