



Irish Wind Energy Association
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The Forward Planning Section
Galway County Council
Prospect Hill
Galway

By email: countydevelopmentplan@galwaycoco.ie

9 May 2014

Re: Review of the Draft County Development Plan, 2015 - 2021

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 wind energy and related policies of the Draft Galway County Development Plan (CDP).

IWEA welcomes the opportunity to participate in the review of the Draft County Development Plan 2015 - 2021. As this document will aim to direct the future growth of County Galway over the medium to long term and, in particular, the development of wind energy within the County, IWEA very much welcomes the opportunity to comment at this consultation stage and remain at the disposal of the forward planning department should you wish to contact us in relation to any issue.

Yours sincerely,

**sent by email, bears no signature*

Caitríona Diviney
Chief Operating Officer
Irish Wind Energy Association

Introduction

In recent years Ireland has become heavily dependent on the importation of fossil fuels in order to meet its energy needs, with fossils accounting for more than 85% 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.

Galway County Council is to be commended on taking a leadership role in the robust assessments carried out in order to develop a Wind Energy Strategy (GWES). It can be noted that several decisions by An Bord Pleanála in recent years took cognisance of the location of the proposed wind farms relative to the GWES. For developers and the community zoning provides much needed clarity on proposals.

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, Ireland's target for electricity from renewable energy sources (RES-E) is 40% by 2020.

Based on Galway's geographical and topographical advantages which lend to a high energy conversion rate, it is imperative that Co. Galway continues to take a national leadership role in terms of reaching that 40% target.

In this regard IWEA welcome the acknowledgement under Section 7.4 that:

"County Galway has, in terms of renewable energy, huge potential for the development of wind, solar, biomass, geothermal, hydro and wave energy. The wave and wind resources along the west coast are among the richest in Europe"

And the allied commitment under Objective ER 3 – to promote County Galway as a low carbon County by 2020.

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 planning, construction, operation & maintenance, legal and accounting and project management. More wind on the system will also result in lower and more stable future energy prices for consumers while helping us achieve our energy and emissions targets.

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. In March 2014, Irelands total installed wind capacity was 2080MW, generated from 180 wind farms and with the capacity to supply electricity to 1.35million homes. County Galway's share of Irelands total comprises an installed capacity of just over 112MW (As of March 2014). An estimated doubling of national installed capacity is required on-shore in Ireland by 2020, in order to meet our RES-E target.

It should be noted however that the 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, lower energy prices and 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.

In this regard IWEA welcome also the clear statement under *DM Standard 30: Wind Farm Development* that:

"Planning applications for wind farm development shall be in compliance with DoEHLG Wind Energy Development Guidelines 2006 (including any new guidelines when issued) and the County Galway Wind Energy Strategy (WES)."

IWEA are clear that the DoEHLG 2006 guidelines and any subsequent update are the appropriate national planning guidance and must be maintained.

Current Galway Wind Energy Strategy

IWEA welcome the continued emphasis and inclusion under the Draft CDP of the current Galway Wind Energy Strategy (GWES) which identifies strategic wind farm development areas in terms of their suitability for wind farm development based on strategic analysis in relation to wind resources, natural heritage designations, landscape sensitivity, infrastructure capacity, settlement growth and amenity considerations.

IWEA welcome the restatement under section 7.4.2 of the Draft CDP the plan-led approach to wind energy development in County Galway which sets out *Strategic Areas, Acceptable in Principle Areas, and areas Open for Consideration, we back the clear statement that:*

"It is the policy of the Council to maximise wind energy development in all three of these areas on a case by case basis subject to meeting specific requirements and guidance contained within the Strategy. An aim of the strategy is to meet a minimum target of 500 MW of wind energy in County Galway and to generate the equivalent of over 70% of its electricity needs from wind energy"

IWEA notes that the new strategy should be reflective of new technology and turbine types since the last Development Plan was published, which are currently being installed in many developments.

The current Wind Energy Strategy summarises the primary rationale for the zoning designations and acts as a capacity analysis having regard to national policy targets. Potential energy output figures are derived from the area extents of zoned land. IWEA is firmly of the view that development on these

zoned lands poses a number of challenges with regard to ensuring that Galway County Councils stated 2020 targets can be met.

In the first instance, there may be site specific issues which may mean that the potentially developable area is reduced. Based on industry experience the ratio of energy per ha varies dramatically and the scenarios in the CDP are optimistic. Once the list of constraints is added to a given site the developable area reduces dramatically. In addition, there may be issues with land availability (ie. insufficient land that is suitable or landowners that may not have interest in seeing their land developed) which further reduces the capacity of the area to accommodate new development.

Having 48% of the county zoned as an area where wind is not normally permissible (as in the current GWES) while SA – Strategic Areas, AP – Acceptable in Principle areas and OC – Open for Consideration areas together amount to only 20% restricts the potential for also small scale developments across the entire county. IWEA also notes that the distance from the grid should not be a limiting factor in zoning.

Conclusion

The policies outlined by Galway County Council in its Draft CDP are progressive and show the hallmarks of a balanced well thought through strategy for the wind sector and population of Galway alike. IWEA welcome the clear statement of support for renewable energy in the County as set out under Objective ER 4 – Renewable Energy and through the clear inclusion of the GWES within the Draft CDP through Objectives ER 5 and ER 6 which we consider strikes a good overall balance.

In summary, factors are there that would underline the fact that a flexible approach to development should always be taken and that aspects of the current framework could frustrate new wind energy development. **Consequently, IWEA ask that the Council retain but importantly increase the extent of areas designated as Strategic and Acceptable in Principle to allow flexibility and sufficient headroom to realise the ambitious 2020 development target of 500MW in the County.**

IWEA hopes that this submission will inform the development of the Draft Galway County Development Plan 2015-2021. We remain at your disposal if you have any questions on our submission above or on the current wind energy development position in Ireland.