



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

Mr. Eoin Bennis,  
Planning Section,  
Department of the Environment, Community and Local Government,  
Custom House,  
Dublin 1.

By email: [eoin.bennis@environ.ie](mailto:eoin.bennis@environ.ie)

Date: Friday 6<sup>th</sup> June, 2014.

**Re: Inspectors Report to the Ministerial Direction under Section 31 regarding the Westmeath County Development Plan 2014 – 2020.**

Dear Mr Bennis,

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 Westmeath County Development Plan 2014 – 2020 (CDP).

IWEA have been proactively involved throughout the public consultation process of making the Westmeath County Development Plan 2014 - 2020, having made detailed submissions on 15 November 2013, 12<sup>th</sup> April 2013 and 17<sup>th</sup> April 2012. Most recently, IWEA also made a submission, dated March 12<sup>th</sup> 2014 to the Ministerial Direction pursuant to Section 31 of the Planning and Development Act 2000, and would like in regard to the Independent Inspectors report to restate IWEA's concern in relation to the negative impacts the maintenance of the text highlighted under the Ministerial direction would have.

**Primarily IWEA restate our clear opposition to objective P-WIN 6**, which calls for 10 times the turbine height as a setback distance, and we fully concur with the Ministerial direction that this policy is "*significantly inconsistent*" with national and regional policy and would "*effectively rule out the consideration of wind energy projects of any scale in the County of Westmeath.*"

**IWEA welcome and concur with the findings of the Independent Inspector**, which clearly recommend that:

*"Having regard to my assessment, as set out above, I recommend that, in so far as it relates to the issue referred to in 2 (ii) relating to policy P-WIN6, the Minister should issue a Direction on the basis of the Draft Direction."*

IWEA would further welcome and echo the findings of the Independent Inspector in his concluding findings:

*"I consider that the impact of the proposed set back would be very significant, particularly when taken in conjunction with other wind energy related policies contained in the plan e.g.*

*P-WIN2, which is to strictly direct large scale wind energy production projects onto cutaway peatlands and the Wind Energy Development Capacity map (Map No. 5) of the plan which indicates most of the county as having low capacity and a small proportion having medium capacity.”*

And finally IWEA would **raise with concern the findings of the Independent Inspector around the intent of this proposal**, and ask that this independent finding be given clear consideration by the Minister in confirming her final direction in this matter.

*“It appears to me, from the plan and from the submissions that the overall intent with P-WIN6 included is to effectively exclude commercial sized wind farms from the county. I consider that if such policies were adopted nationally there would be a serious danger of targets not being reached. Such policies would be inconsistent with the national targets for electricity generation from renewable sources by 2020 and even more directly in contravention of the policy to increase on and offshore wind energy production as set out in the Strategy for Renewable Energy 2012—2020.”*

IWEA would furthermore like to restate our strong and consistent opposition to several of the policies contained within the CDP which, we believe will also seriously negatively impact on wind development in the County but were not raised under the Ministerial direction, and which IWEA consider should be further examined. In this regard we note that the Inspectors report confirms on page 8 that:

*“The impact of P-WIN6 in association with the other policies can of course be considered in determining whether or not to issue a Direction.”*

The specific detail of these concerns has already been outlined in our previous submissions on this CDP, but to summarise:

**P-WIN2 – which “strictly directs” large-scale energy production projects, in the form of wind farms, onto cutover cutaway peat lands in the county.**

- IWEA reiterate that such a policy restriction to **strictly direct** wind energy into cutover cutaway peat lands will clearly **limit** the County’s capacity for wind energy development.

**The use of the term “Industrial” in section 10.5.2 “Industrial Scale Wind Farms”.**

- IWEA ask that it should be noted that there is no such thing as the term “industrial scale wind farms.”

**The “Reduction in Wind Energy Designations” as set out in the Wind Energy Development Capacity Map.**

- IWEA are strongly concerned that the Council have **further reduced** the Wind Energy Designations within the County without clear reasoning. The systematic reduction has resulted in only one area of the County considered to have Medium Capacity while the reminder of the County has been deemed Low Capacity for Wind Energy Development.

Finally, IWEA would reiterate our concern that this proposal brought forward by Westmeath County Council represents a serious threat to the development of wind energy in the county.

In making this submission and those which preceded it, IWEA have at all times been clear and consistent in our desire for there to be clear adherence to a strategic and sustainable planning approach in line with national and regional policy.

Yours sincerely,

*\*sent by email, bears no signature*

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Caitríona Diviney,  
Chief Operating Officer,  
Irish Wind Energy Association.

