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14th May 2010

Border Regional Authority,
Corlurgan Business Park,
Ballinagh Road,
Cavan,
Co. Cavan
By email: to rpg@border.ie

Re: Submission on Regional Planning Guidelines for the Border Region

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 Border Regional Planning Guidelines (BRPG). As the guidelines will assist in the assessment of planning applications for wind energy developments and inform the subsequent decision making process, IWEA feels it is critically important to comment on the regional planning guidelines currently on public display. We very much welcome the opportunity to comment at this consultation stage and look forward to engaging constructively with you going forward.

IWEA would like to request a meeting with the Regional Authority to discuss the RPG and our response in more detail.

Yours sincerely,

**sent by email, bears no signature*

Caitríona Diviney
Chief Operating Officer
Irish Wind Energy Association

IWEA Submission on the draft Border Regional Planning Guidelines

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. Climate change is fast becoming a more important national and international issue. The availability of significant natural resources provides the Border Region in particular, due to its geographic location and its high average wind speeds, with the opportunity to make a meaningful contribution to this issue while delivering a cleaner local environment. Wind energy produces indigenous renewable electricity while reducing greenhouse gas emissions by displacing traditional fossil fuels. IWEA believes that increasing the share of our energy from renewable sources will deliver significant benefits for the electricity customer, the local economy and society. Recent volatility in fossil fuel prices has demonstrated that regions with a high dependence on energy imports are exposed to a high level of risk. This volatility makes it difficult for investors in the economy to make reliable long term forecasts of their energy costs. The most effective way to reduce this volatility is to increase the share of energy costs that are predictable and based locally. This will lead to lower and more stable long term energy costs. As other regions move to stabilise their long term energy costs it is essential that Ireland continues to increase its relative competitiveness in this area. It is estimated that between 25 and 30% of capital investment in renewable energy is retained in the local economy. This typically flows to the community in terms of land lease payments, local road upgrades, to the county council in terms of rates and to companies in terms of construction, legal, finance and other professional services.

It is essential that a planned and sustainable approach to development is adopted to ensure a future balance of economic development and employment creation with continued protection of the environment.

1.1. National Policy

There has been a number of policy documents published in recent years relating to targets for renewable energy developments. In March 2007 the Government published an Energy White Paper, Delivering a Sustainable Energy Future for Ireland 2007-2020. This paper sets out the Government's Energy Policy Framework 2007-2020. The report details the many challenges Ireland is going to face in the future and sets actions and targets for a framework to 2020. The paper set a target of 15% for renewable energy generation by 2010, and 33% by 2020.

The European Renewables Directive (2009/28/EC) on the promotion of renewable energy sources came into effect in 2009, 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. In line with these commitments, Minister Eamonn Ryan T.D. announced a revised target for electricity from renewable energy sources (RES-E) of 40% by 2020. In the case of Ireland it is widely acknowledged that wind energy will contribute the vast bulk of this target. Failure to meet these targets could result in EU sanctions. It is proposed that the Regional Planning Guidelines include an overall objective on renewable energy, in line with the targets to which Ireland is committed.

The first National Climate Change Strategy (NCCS) published in 2000, was reviewed in 2006 resulting in the publication of the NCCS 2007-2012 detailing how Ireland will meet its Kyoto 2008-2012 commitment and beyond. The Strategy states that: *“Electricity generation from renewable sources provides the most effective way of reducing the contribution of power generation to Ireland’s greenhouse gas emissions.”* This increase in renewables is largely expected to come from wind energy.

Ensuring the security of energy supply is also a key part of the Government’s recent *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. 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 and lower energy prices. The wind energy sector generates more jobs per MW of power installed, per unit of energy produced and per euro of investment, than the fossil fuel energy sector. Industrial and craft jobs are created right through from manufacture and production to installation and maintenance. Although approximately 60% of these jobs are in the turbine and component manufacturing sector which are outside of Ireland, the remaining 40% of the jobs are in promotion, construction, engineering, project management, legal, operation and maintenance, accounting and financial services .

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. By May 2010 the installed capacity of wind energy had reached 1,379MW, with wind energy accounting for circa 11% of total electricity generation in Ireland in 2009. Another approximately 5,000 MW of additional wind capacity will need to be installed within the next 10 years if Ireland is to meet the 40% target. This expansion in a relatively short period of time will present a considerable challenge for local authorities, not just in terms of processing planning applications for wind farms and grid connections, but also in terms of identifying lands suitable for wind farm development.

In identifying suitable areas for development, regard should be had to the level of the wind resource present, the separation distances from residences and sensitive buildings, the nature and the habitat status of the surrounding landscape and the Department of the Environment, Heritage and Local Government’s (DEHLG) Wind Farm Planning Guidelines 2006.

The current Government is striving to reach these EU targets for renewable energy and the development of wind farms is a priority, particularly in areas which are ideally suited for wind development. Generally there is a consistent and coherent policy to encourage and promote the development of wind farms provided they are in accordance with the proper planning and development of the area.

1.2. DoEHLG Wind Energy Development Guidelines (2006)

In June 2006, the Department of Environment, Heritage and Local Government (DoEHLG) published Wind Energy Development Guidelines for Planning Authorities under Section 28 of the Planning and Development Act, 2000, requiring planning authorities and An Bord Pleanála to have regard to them. The purpose of these guidelines is to provide advice to planning authorities on planning for wind energy through the development plan process. They also provide clarity to prospective developers and local communities.

Section 1.2 of the guidelines note the following *“The development of renewable energy sources, together with measures aimed at a reduction and more efficient use of energy, are priorities, nationally and at European level, on both environmental and energy policy grounds.”*

1.3 Jobs and Investment Potential

Last Year the IWEA commissioned Deloitte to carry out a Joint Jobs and Investments Study which was launched on 15th June 2009. This study showed that there will be significant direct opportunities created by the expected investment of over €14 billion in the Irish wind energy sector over the coming decade with over €5 billion of this retained on the local economy. The report also showed that the Irish wind energy sector is capable of supporting more than 10,760 jobs through direct and indirect involvement in the sector. Employment numbers the Border Region are indicated below, these figures are considered to be significant and are only an element of the potential to be realised (These figures are taken from Table 4 – Employment Numbers by Province)

County	MW	Jobs
Donegal	343	538
Sligo	43.9	69
Leitrim	48.5	76
Monaghan	72.09	113
Louth	18.23	29
Cavan	45.32	71
Total	571.04	896

There is currently 418.52 MW of wind generation installed in the Border Region, with a further 509.5 MW approved connection capacity for onshore wind. The delivery of this approved capacity will equate to substantial investment in the Border Region in terms of civil and project engineering, legal and accounting services, electrical and mechanical servicing, land lease payments, operations and maintenance activities and local authority rates payments.

The current capital investment for every installed MW capacity of on-shore wind in Ireland is estimated at approximately €1.76 million. According to the Deloitte Jobs and Investment In Irish Wind Energy Study it is estimated that between 25 and 30% of capital investment in renewable energy is retained in the local economy, therefore approximately €528,000/MW of this investment is in wind farm project construction including professional and operational services which are sourced both regionally and nationally. This equates to a potential investment in the Border Region of approximately €269 m if the approved connection for onshore wind is facilitated and implemented in full.

2. Draft Border Regional Planning Guidelines

Ireland has one of the best wind resources in Europe, yet the industry is relatively undeveloped compared to some of our European counterparts. Ireland should be harnessing this free natural resource and become a net exporter of power rather than importer, dependent on external energy sources. Given our geographical location, we are at a significant advantage to most other countries in our renewable capacity. It is of vital importance for the future of our environment & economy, to harness these natural resources. The Border Regional Planning Guidelines must be pro active in encouraging industrial and economic activity in order to promote economic and employment generation for the Border region.

2.1. General Submission Proposals

IWEA wishes to emphasise that the optimum siting of wind farm developments is in an area where there is a sufficient wind resource. 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. Identification of suitable areas will ensure that wind energy will be developed on the optimum sites and will deliver tangible benefits in terms of Local Authority rates, service jobs in legal, engineering and construction, construction supplies, landowner annual rental income and increased security of electricity supply.

Wind resource

The energy in the wind is a cubic factor of its speed. This means that there is eight times more energy in wind with a speed of 10 meters per second (m/sec) compared to a wind speed of 5m/sec. In inland counties, which are not exposed to a vigorous coastal wind regime, the best wind resource exists in the elevated areas.

Given that sustainable development is now one of the most universally endorsed aspirations of our time and that it is generally recognised that sustainability is a central concept which must underpin economic, social and environmental development wind farms should be built where the resource can be harnessed economically and therefore forward planners need to seriously consider the optimum sites in the county, in terms of resource for wind energy development.

Designated areas

There are a variety of habitats and areas designated in the Border Region, for example, NHAs, SACs and SPAs. There are situations where the designation of some of these sites with proper controls in place, would not be negatively impacted upon by the development of a wind farm near or on the site. In particular wind farms may have little or no impact on sites if the construction process is managed in a manner sensitive to the key reason for the designation. In such cases wind energy developments should be considered on their individual merits rather than with a presumption of incompatibility with the designated area.

2.2 Specific Submission Proposals

The Governments White Paper on 'Delivering a Sustainable Energy Future for Ireland' recognises that wind energy will play an important contribution in meeting the '40% electricity from renewables by 2020' target. IWEA welcomes recognition in these Draft Regional Planning Guidelines that EirGrid's Grid Development Strategy: Grid 25, is a critical element in planning Irelands electricity needs and facilitating more sustainable power supplies in support of this sustainable energy future and renewable energy deployment. Grid 25 does not have a specific section designated to the Border Region, but this is covered by the North West and North East Regions outlined in the strategy. It identifies the North

West Region as rich in wind resources, and the North East Region as an area which has ‘high potential’ for off-shore wind generation. The planned North-South Interconnector line will be key to the Border Area, and will be particularly significant to the All-Island Single Electricity Market, as it will provide long long-term capacity between the regions and will ensure security of supply for the surrounding areas. This Interconnector Line will also increase the opportunities to provide renewable energy in the Region. Grid 25 forecasts that Co. Donegal in particular (in the North-West) will have up to 691 MW of Wind Generation, resulting in the area becoming a net exporter of power to the rest of the island and reducing its reliance on generation outside the region. There is currently 418.52 MW of wind generation installed in the Border Region, with a further 509.5 MW approved connection capacity for onshore wind, and 330MW approved for offshore wind. All of the above factors will contribute to substantial investment in the Border Region in particular to areas of civil and project engineering, legal and accounting services, electrical and mechanical servicing, land lease payments, local authority rates payments and operations and maintenance services and supplies.

It is suggested that the Regional Planning Guidelines for the Border Region 2010-2022 contains more specific policies and objectives to facilitate the above development of Grid 25 and in particular the proposed North-South Interconnector Line.

Suggestions for the Draft Regional Planning Guidelines for the Border region 2010-2022:

Below are a number of comments for particular sections of the Draft Guidelines:

- *Pg 22 - 1.10 Energy – ‘Electricity is the main energy demand in the Region, largely met by the main energy supplier, the ESB. The development of more sustainable, competitive, diverse and secure supplies of electricity to support economic and social development is a key challenge for the Region. Extending the network into Northern Ireland and the UK through interconnectors, will provide the Region, and the Country, with a secure and reliable electricity supply into the 21st Century. Like many of the Regions in the country, demand for electricity will continue to increase, despite the efficiencies being made through innovation and new Technologies’.*

The proposed future development of the North-South Interconnector (400kv) line will be key to the Border Region, this line will connect from Kingscourt in Co. Cavan to Turleenan in Co. Tyrone. This line aims to provide long term capacity between Northern Ireland and the Republic of Ireland, and will help to ensure security of supply to the region. The long term benefits of this line as outlined in Grid 25; includes increased opportunities to provide renewable energy to the Region. IWEA therefore recommends that the Guidelines should provide specific policy with regard to this as the development of this line is key to facilitate and improve on the future renewable energy potential in the region as a whole.

- *Pg 26 - 1.15 Key Future Investment Priorities for the Border Region*

IWEA are encouraged by Table 1.9 Future Investment Priorities for the Border Region, which includes Development of Transmission Grid Network as one of the future investment priorities. It may be beneficial if the BRA conclude this table/section by stating that BRA support development of this proposal.

- *Pg 28 - 1.16 Challenges for the Region - item 9, state: 'The electricity grid infrastructure, in the north West (NW) in particular, requires upgrading if the potential for renewable energy generation is to be realised'.*

Facilitating the appropriate development of wind energy in the region is a key priority for the region. The above challenge should be re examined and consideration should be given to the following: 'Renewable Energy generation offers significant potential for growth in the region, upgrading of the electricity grid infrastructure in particular the north-west (NW) is encouraged in order to achieve this.

- *Pg 29: 2.2 Key Strategic Goals*

IWEA suggest that this section should include goal in relation to renewables 'To promote and facilitate the appropriate development of renewable energy developments within the Region'.

- *Pg 58 - 4.3.3 Economic Infrastructures: Access and Connectivity - The Region benefits from interconnection to the Northern Ireland electricity grid and further integration of the grids, North and South, is planned. The transmission network in the North-West requires significant reinforcement, which is essential if the significant untapped wind energy potential in this part of the Region is to be realised.*

This paragraph should conclude by stating that the roll out of the Grid 25 programme will be fully supported by the BRA.

- *Pg 74: Section 4.7- Development Plan Implications - Planning authorities should also make provision for alternative uses of agricultural land including afforestation and renewable energy. To this end, 'a Renewable Energy Strategy for the Region should be developed to highlight the important and emerging areas as discussed here and further outlined in Chapter 5. The Strategy should also outline common criteria that would be used by Planning Authorities in making decisions on such proposal and, ideally, would include a regional map of areas considered suitable for such development, though any such designations in areas that are, or contain European Sites should be subject to Habitat Directive Assessments being carried out'.*

IWEA welcomes the suggestion that the proposed Renewable Energy Strategy should contain 'common criteria' that would be used by Planning Authorities in making decisions on a wind farm proposal. IWEA however suggest that the proposal to include a regional map suggesting areas suitable for these developments is not the most effective method. Identifying potential sites should take into account various assessments/criteria many of which are required to take place over large periods of time. Zoning potential sites may fail to include site specific issues at a micro level which are relevant to a particular area.

IWEA suggest that the guidelines should encourage and provide a balanced approach to the development of Wind Farm proposals throughout the region and in particular within the proposed Renewable Energy Strategy.

- *Pg 94 - 5.5.1. Wind Energy: The Border Region is ideally located to make significant contributions, through wind energy, to the revised targets for renewable energy generation (RES-E) of 40% with resulting economic benefits. Local Authorities will provide landscape sensitivity analysis, in support of the regional strategy on*

renewable energy generation, to further refine locations suitable for development. All wind farm applications will be assessed on the full range of criteria identified in the Wind Farm Development Guidelines, published by the Department of Environment, Heritage and Local Government.

IWEA note the suggestion for Local Authorities to provide a Landscape Sensitivity Analysis. This type of analysis can act as a useful guide to identify whether sites are in a less sensitive location. They can be quite useful, however it should be emphasised that they should merely be used as a guide - as there may well be site specific issues at a micro level which this analysis will not pick up.

- Pg 95 – Renewable Energy Policy.

This section should include a specific policy which states or incorporates the following: ‘Promote the development and construction of Renewable Energy facilities in appropriate locations throughout the Region’.

- Pg 95 – Renewable Energy Strategic Objectives: INFO7 – Provide landscape sensitivity analysis, in support of the regional strategy on renewable energy generation, to further refine locations suitable for development.

Identifying suitable site for wind farm developments by landscape sensitivity analysis solely may result in a number of site specific issues at a micro level which are relevant to a particular area being left out.

Further to this IWEA are not in favour of the word ‘refine’ to be used in the context above a more suitable phrase would be ‘to identify locations suitable for development’.

3. Conclusion

The Border Regional Authority has adopted a very progressive outlook on the renewable energy sector and we would like to commend the Authority for their continued support to the renewable industry. Application of national energy targets at local level is best achieved through this type of positive collaboration with the relevant parties.

However while the Border Regional Authority is predominantly positive in its policies and objectives on the development of the renewable energy sector more emphasis could be placed on the significant economic potential of developing renewable energy projects in the region. The existence of a significant resource which can be harnessed, particularly the wind resource, is well established and ambitious plans for its development are prescribed in National Development Plan 2007 -2013, National Climate Change Strategy 2007 – 2012, The Energy Policy Framework 2007-2020 and Grid 25.

The Regional Planning Guidelines for the Border Region 2010-2022 could be used as a framework document to realise the potential for the Border region to develop a sustainable, regional renewable energy industry employing construction and professional service providers.

To achieve an increase in renewable generation in the Border Region, upgrading, strengthening and facilitation of the electricity transmission network is needed alongside the replacement of older plants by conventional generation to integrate the large amount of renewable required.

GRID25 includes a number of planned investments particularly within the Border Regional Area. IWEA would be keen to see such projects as the North-South interconnector developed as soon as possible. The full potential of our natural wind resources can only be realised if Ireland has good levels of interconnection with the UK and mainland Europe. Increased interconnection will allow us to export electricity in cases of excess wind generation while providing security of supply for times of less wind, and provides Ireland with the opportunity to become a net exporter of electricity

If Ireland is to meet its national targets and its international obligations, it is essential that all regions develop a well designed wind development strategy. IWEA looks forward to the publication of the Renewable Energy Strategy for the Border Region as described in these guidelines. This guidance document should set out clear targets and guidelines in order to encourage and promote renewable energy development in the Border Region. The guide will ultimately work towards helping Ireland to meet its national targets and international obligations.

This IWEA submission endeavours to suggest a more proactive approach in the Regional Planning Guidelines to renewable energy development in the Border Region.