

Irish Wind Energy Association  
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3 June, 2011

County Development Plan Submissions  
Forward Planning Section,  
Wexford County Council,  
County Hall,  
Wexford.

By email: [forwardplanning@wexfordcoco.ie](mailto:forwardplanning@wexfordcoco.ie)

***Re: Review of the County Development Plan 2007-2013 and  
Preparation of a new Plan for the County***

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 Wexford County Development Plan (CDP). IWEA welcomes the opportunity to participate in the review of the current County Development Plan and the preparation of a new Plan. As this document will aim to direct the future growth of the County Wexford over the medium to long term and assist in the assessment and decision making of planning applications for wind energy developments, IWEA very much welcome 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*

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Caitriona 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 92.6% 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.

## ***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, DCENR recently announced a revised target for electricity from renewable energy sources (RES-E) of 40% 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 construction, operation & maintenance, legal and accounting and project management. More wind on the system will also result in lower and more stable 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 May 2011 Ireland's total installed wind capacity was 1,838MW, generated from 158 wind farms in 27 counties. County Wexford's share of Ireland's total comprises 4 windfarms with a combined installed capacity of 61MW. Another 4,662MW of additional wind capacity, roughly equating to 2,000 new turbines, will need to be installed on-shore in Ireland within the next 9 years if we are to meet our RES-E target.

It should be noted however that 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, 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 identifying suitable zones for development, regard should be had to, among others things, the level of the resource, the nature of landscape, and the status of the surrounding lands and the Department of the Environment's Wind Farm Planning Guidelines 2006.

### ***Efficiency***

Building larger and more efficient turbines mean fewer turbines overall. For some larger commercial turbines, a 10-15% increase in turbine height can increase the energy yield by up to 50%. These more efficient turbines, increase our ability to meet targets, reduce the amount of turbines needed and reduce the amount of raw materials required. When delivering the least cost solution to society, the grouping or clustering of wind projects in relatively close proximity on sites with suitable resource is crucially important to reducing cost to both developers and consumers. Well planned cluster developments enable developers to achieve lower average connection costs and reduce the costs and timelines of infrastructure delivery for the Grid Operator.

### **Wexford County Development Plan 2007-2013 Comments:**

#### ***Appendix 3 Wind Energy Development Strategy Part 1***

IWEA welcomes the inclusion of Appendix 3 to the current County Development Plan and the identification of suitable zones, for wind farm development. We wish to iterate that the optimum siting of wind farm developments is in an area where there is a sufficient wind resource i.e. reasonably elevated, where a separation distance of at least 450m from the nearest residences can be achieved and where the land area is large enough to accommodate the modern larger turbines which require significant separation distance from each other. However Appendix 3 of the current Strategy simply classifies the County into 2 Areas 1 - Areas Open for Consideration and 2 - Areas that are Not Normally Permitted. The Wind Farm Planning Guidelines (2006), which offer advice to planning authorities on planning for wind energy through the development plan process, recommend that the development plan should produce a basis for identifying an additional area namely; Areas where wind energy developments would be 'acceptable in principle', Areas where they would be 'open for consideration', and Areas where they would be 'not normally permissible'.

The current Strategy for Wexford does not identify Strategic areas where windfarms are 'acceptable in principle'. Identification of these suitable areas in the new Plan would enable wind energy to be developed on additional sites in County Wexford which would deliver tangible benefits to the County in the form of increased Local Authority rates, service jobs in legal, engineering and

construction, construction supplies, land owner annual rental income and increased security of electricity supply.

### **Appendix 3 Wind Energy Development Strategy Part 2**

There are some policies contained in the current Strategy in Part 2 – **6. Development Control Standards for Wind Farms** which either do not reflect the Wind Energy Guidelines or may prove to be unduly restrictive to wind farm developments. We respectfully suggest that forward planning consider some changes to the current Strategy as in;

- In **6.3 Boundaries** turbines are not permitted within 250m of an adjacent landholding boundary. We suggest that this distance could be reduced with the written consent of the neighbouring landowner as is the case in the Strategy in section **6.2 Dwelling Houses** where a turbine can be located closer than 500m to a dwelling if written consent is acquired.
- In **6.18 Safety Aspects** consultation is recommended with the National Roads Authority in the case of National and Secondary Routes and with the Local Authority in the case of Regional routes, with regard to setback distances from these roads. The Guidelines recommendation is not as restrictive as in

***Section 5.8 Proximity to Roads & Railways.....Although wind turbines erected in accordance with standard engineering practice are stable structures, best practice indicates that it is advisable to achieve a safety set back from National and Regional roads and railways of a distance equal to the height of the turbine and blade.***

This would indicate a recommended setback of c.125m from National & Regional roads.

- In **Section 6.20 Decommissioning** of the current Strategy it states that there should be an automatic condition of planning that all windfarm developments must decommission after a given number of years. This is contrary to the Wind Energy Guidelines and would impose a considerable commercial restriction on a given project. In Chapter 7 – Planning Conditions of the Guidelines it is recommended that such restrictions should be avoided where in Section 7.20 – Time Limits it states

*Having regard to the statutory provisions regarding the life of a planning permission, conditions should not require that a development be commenced or finished by a certain date. Conditions that limit the life of a wind energy development to a particular time period have been included in the past in order to enable the planning authority to reassess the operation or re-equipping of the wind energy development in the light of circumstances prevailing at the time. This can instead be achieved by way of a condition requiring that future re-equipping be agreed in writing with the planning authority or be the subject of a separate planning application. The inclusion of a condition which limits the life span of a wind energy development should be avoided, except in exceptional circumstances.*

*Planning authorities may grant permission for a duration longer than 5 years if it is considered appropriate, for example, to ensure that the permission does not expire before a grid connection is granted. It is, however, the responsibility of the applicants in the first instance to request such longer durations in appropriate circumstances.*

We suggest that Section 6.20 of the current Strategy be reconsidered.

### **Conclusion**

IWEA hope that this submission will inform the new County Development Plan. We remain at your disposal if you have any questions on our submission above or on the current wind energy development position in Ireland.