



**IWEA submission on the Planning Strategy Statement for the Department of the Environment,  
Community and Local Government.**

**25 July 2011**

IWEA welcomes the opportunity to comment on the Statement of Strategy which will set out the high level goals and objectives of the Department, as well as the strategies to be used to achieve them. The Irish Wind Energy Association (IWEA) is the national body representing the wind energy sector in Ireland. IWEA members incorporate all of the leading industry voices, and actively promote awareness and understanding of wind power as the primary renewable energy resource. IWEA also supports the development of other renewable technology, particularly marine energy. IWEA is committed to education and awareness building, to building the skills base of the renewable energy sector in Ireland and to promoting the use of a sustainable energy system in Ireland, and thus contribute to a cleaner environment.

Wind energy has the potential to make a significant contribution towards Ireland's economic recovery if properly supported, however unless we see significant commitment, in terms of joined up thinking between departments, it is difficult to see how wind energy can be delivered in line with EU Directive targets.

IWEA notes that the previous statement of strategy outlined that the mission of the Department is to pursue sustainable development and two of the primary mandates of the Department are to:

- "achieve a high quality environment with effective environmental protection"; and
- "address climate change."

Wind energy can play a significant role in addressing climate change through a significant reduction in carbon emissions. Ireland has become heavily dependent on the importation of fossil fuels in order to meet its energy needs, with fossil fuels 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.

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, the DCENR announced a revised target for electricity from renewable energy sources (RES-E) of 40% by 2020.

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. At the end of June 2011 the total installed wind capacity in the Republic of Ireland was 1,459MW. In excess of 4,500MW of additional wind capacity, roughly equating to 2,000 new turbines, is to be installed on-shore in Ireland within the next 9 years to contribute towards 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 greenhouse gas 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.

IWEA would like to make the following recommendations for inclusion in the new Planning Strategy Statement currently being developed:

- 1) It is essential that the DoECLG interacts with other government departments such as the DCENR to ensure that the objectives of the departments are compatible, and the goals set by one department do not frustrate the achievement of the goals of another department. For example the European Commission has set targets for the production of energy from renewables and it is essential that the DoECLG works with the DCENR to achieve this challenging objective.
- 2) It is of particular importance to the wind industry that the proposed guidelines on the Planning and Development (Amendment) Act 2010 are implemented in a timely manner.

The **Key Strategies** outlined in the previous Planning Strategy Statement include the following:

- *"Ensure full implementation and further development of the National Climate Change Strategy, including measures to reduce greenhouse gas emissions and to integrate climate change adaptation issues into decision-making at national and local level."*

IWEA believes that the increased use of renewable energy is the best way in which to reduce emissions. The use of fossil fuels in electricity and transport contribute significantly to the production of emissions and the decarbonisation of these sectors should be a major focus of the strategy.

- *“Work closely with all relevant Departments and Agencies in developing more ambitious long-term measures for emission reductions and for carbon sequestration.*
- *Promote the integration of environmental and climate change considerations into policy-making across the full range of Government policy and local government functions.”*

IWEA believes that it is essential that there is increased interaction between relevant departments and agencies to ensure the best policies are in place for Ireland to progress to a low carbon future. As these issues cross a number of departments there is increased need for joined-up thinking between departments.

- *“Participate in EU and wider international work to address regional and global environmental problems and ensure full compliance with obligations under EU legislation and international conventions.”*

IWEA has previously raised concerns over conflicting EU Directives and would support increased participation in the development of EU policy across departments with particular emphasis on resolving issues that have arisen to date in Ireland. IWEA has particular concerns in relation to the interaction of the Habitats Directive and the Renewables Directive. IWEA notes that it is possible to develop renewable energy projects in designated areas by taking the reasons for the designation into account in the design of the development and introducing appropriate mitigation measures. It is important that this is recognized by the Department.

IWEA strongly supports these key strategies and recommends that they be included in the new Planning Strategy Statement currently being developed.

## **Conclusion**

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