



Senior Planner,
Planning Department,
Meath County Council,
Buvinda House,
Dublin Road,
Navan,
Co. Meath

13/02/2017

Dear Sir, Madam,

RE: Meath County Development Plan 2019-2025 – Pre-draft Public Consultation

1.0 Introduction

The *Irish Wind Energy Association* (IWEA) welcomes the opportunity to comment on the preparation of the new *Meath County Development Plan 2019-2023 (CDP 2019)*. We have reviewed the strategic policies and objectives relating to wind energy development in the existing Meath County Development plan 2013-2019 (CDP 2013) and the matters raised in the Pre- Draft Consultation, which was published to stimulate discussion.

As the review will inform the vision, objectives and policies of the new plan for County Meath from 2019, IWEA very much welcomes the opportunity to make a submission at the pre-draft stage and look forward to engaging constructively with Meath County Council throughout the development plan process.

From our experience of the operation of the existing CDP 2013 the IWEA has an insight into what has worked well in applying the current policies and objectives. IWEA has some ideas about how the renewable energy policy in the county can be further developed to ensure that the planning system facilitates good planning, supports renewable energy for the good of the consumer and helps drive sustainable energy development, as well as helping Ireland meet its national targets set by the Department of Communications Climate Action and Environment (DCCA).

This submission will set out the strategic context for wind energy development in Ireland before suggesting how specific local policies and objectives can help guide developers, provide an element of certainty and ensure that such developments are carried out at locations and in a way which accords to the proper planning and sustainable development of the area.

2.0 Context & Strategic Objectives

The Irish Wind Energy Association (IWEA) is Ireland's leading renewable energy representative body and as such, it has an active interest in the potential for sustainable energy. IWEA is committed to promoting the use of wind energy in Ireland and beyond, as an economically viable and environmentally sound alternative to other forms of non-renewable generation. IWEA also promotes awareness and understanding of wind power as a primary renewable energy resource. The magnitude of the Irish wind resource and the potential for its development has been appreciated for some years within the European wind energy community. There is a growing appreciation for the amount of energy that can be delivered through wind, in 2015 alone, wind energy produced 21% of the Ireland's electricity demand.

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. Wind energy, in particular has a key role to play in meeting these challenges. IWEA supports a strategic and transparent approach to proper planning and sustainable development, and recognises that development of wind energy projects must take account of the full range of environmental and socio-economic issues.

At the outset, we all must acknowledge Ireland's need to support renewable energy, which include its EU commitments. EU Directive 2009/28/EC was put in place to promote the use of Renewable Energy. This Directive came into force in April 2009 and establishes a binding target of 20% of overall EU energy consumption to come from renewable sources by 2020. 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 will result in EU sanctions. In line with these commitments, the DCCA has set a target for electricity from renewable energy sources (RES-E) of 40% by 2020. The European Union is also now in the process of agreeing the framework for a further series of targets for renewable energy towards 2030. In October 2014, Ireland agreed to new EU 2030 targets, which seek a 40% reduction in Green House Gas (GHG) emissions and a binding EU target for renewable energy of "at least 27%".

Wind Energy is the cheapest form of renewable energy available in Ireland, therefore a significant amount of the renewable energy needed to meet the 2020 and 2030 targets will be required to come from wind energy. Achieving the 2020 and 2030 targets is going to be a significant challenge for the Irish wind industry as a whole. However meeting this challenge will mean there will be an extremely positive economic development for the entire Country and, indeed potentially, for County Meath. Wind farm development in areas will result in direct local investment, job creation, as well as increased local authority income through commercial rates and development contributions. At the same time, new wind energy development will also bring about a reduction of GHG emissions and help tackle global climate change.

Relevant strategic policy documents, such as the new County Development Plan in County Meath, must assist in enabling Ireland to develop its natural green energy resources and meet Ireland's 2020 and 2030 targets. IWEA members are involved in developing more than 85% of the wind farm capacity that is planned to be built from now to 2020 and we continue to contribute proactively and positively to the development of local, regional and national strategic planning.

3.0 Recommendation

IWEA notes and acknowledges the existing positive policies in relation to Wind Energy in the CDP 2013. IWEA recommends that at a minimum these policies are maintained and where possible enhanced.

Policy	Description
Policy EC POL 1	To facilitate energy infrastructure provision, including the development of renewable energy sources at suitable locations, so as to provide for the further physical and economic development of Meath.
Policy EC POL 2	To support international, national and county initiatives for limiting emissions of greenhouse gases through energy efficiency and the development of renewable energy sources which makes use of the natural resources of the county in an environmentally acceptable manner, where it is consistent with proper planning and sustainable development of the area.
Policy EC POL 3	To encourage the production of energy from renewable sources, such as from biomass, waste material, solar, wave, hydro, geothermal and wind energy, subject to normal proper planning considerations, including in particular, the potential impact on areas of environmental or landscape sensitivity and Natura 2000 sites.
Policy EC POL 4	To support the National Climate Change Strategy and, in general, to facilitate measures which seek to reduce emissions of greenhouse gases.
Policy EC POL 13	To ensure that energy transmission infrastructure follows best practice with regard to siting and design particularly to ensure the protection of all important recognised landscapes.
Policy EC POL 20	To encourage the development of wind energy, in accordance with Government policy and having regard to the Landscape Characterisation Assessment of the County and the Wind Energy Development Guidelines (2006).
Policy EC POL 21	To support the preparation of a study on wind energy potential by local authorities jointly in the GDA.
Objective EC OBJ 1	To ensure that all plans and projects associated with the generation or supply of energy or telecommunication networks will be subject to an Appropriate Assessment Screening and those plans or projects which could, either individually or in-combination with other plans and projects, have a significant effect on a Natura 2000 site (or sites) undergo a full Appropriate Assessment.

IWEA notes that existing Landscape Character Assessment in the CDP 2013 provides a detailed analysis of the different Landscape Character Types in the County, rating them under a number of headings such as: Landscape Value, Landscape Sensitivity, Landscape Importance and Capacity for Wind Energy, therefore this assessment assists in guiding Developers to areas of potential within the county.

The current national guidelines for wind energy are the Wind Energy Development Guidelines 2006 (WEDG 2006). There is currently a targeted review of certain sections of the WEDG 2006 ongoing & IWEA notes circular PL2013 from the Department of in which Local Authorities are requested to defer amending their existing Development Plan policies as part of either the cyclical review or variation processes while the review of the current Wind Energy Development Guidelines 2006 (WEDG 2006) is being undertaken. Therefore IWEA requests that Meath County Council await the finalization of the review of the WEDG 2006 before amending the Development Plan policies with regard Wind Energy. In addition IWEA request that as part of putting the CDP2019 in place, Meath County Council confirms that the WEDG 2006 remain in place until otherwise advised by the Department and finally IWEA request that Meath County Council commit to proceeding to finalizing and putting in place a Wind Energy Strategy for the County ASAP once the review has been completed.

4.0 Conclusion


IWEA looks forward to reviewing the proposed strategic objectives of the CDP 2019 which should enable an integrated and sustainable approach to wind farm development supporting sustainable communities, rural development and economic investment to the region. Furthermore, the inclusion of specific objectives in the new County Development Plan that promote the further development of renewable energy will enable Meath County Council to:

- Develop a sustainable plan led wind energy industry, employing construction and professional service providers and attracting significant capital investment for the County;
- Enhance the vibrancy of the county as a renewable energy leader,
- Support rural development in a sustainable manner;
- Deliver significant community benefit in areas where projects will be developed,
- Deliver significant commercial rates revenue to County Meath annually and,
- Provide certainty for planners, public, investors and developers.

This new Development Plan is a valuable opportunity for Meath County Council to realise and plan for, in an appropriate manner, the renewable energy potential of County Meath. This can be achieved by adopting informed, measurable and deliverable objectives. The importance of adopting clear policies and a detailed wind energy strategy using a logical methodology and with the benefit of the statutory process is immeasurable. This approach brings a greater degree of clarity for those proposing projects, local communities as well as for the planning authority and An Bord Pleanála.

IWEA would welcome the opportunity to meet with the Forward Planning Section to discuss our response in more detail at any stage. We thank you for the opportunity to contribute at this first stage consultation and we look forward to contributing further as the strategic plan progresses.

Yours sincerely,



Adam Ledwith,
Head of Communications and Public Affairs