



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

Planning Section,
Galway County Council,
Áras an Chontae,
Prospect Hill,
Galway,
H91 H6kX.

By email to devcontributions@galwaycoco.ie

18 February 2016

Re: Galway Draft Development Contribution Scheme 2016

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 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 thermal or nuclear generation and promotes awareness and understanding of wind power as a primary renewable energy resource. IWEA members are involved in more than 85% of the wind farm capacity planning to build from now to 2020.

IWEA welcomes the opportunity to respond to the consultation on Galway County Council’s Draft Development Contribution Scheme 2016. IWEA also welcomes the proposed continued exemption from development contributions provided for domestic wind turbines of up to .5MW as a positive incentive to the further use of renewables.

However IWEA has strong concerns regarding the proposed development contributions that apply to both commercial and community based/local wind turbines. The development contribution levels proposed for commercial wind energy, of €10,000 per megawatt capacity, marks a significant and unjustified increase from the previous 2010 Galway Development Contribution Scheme¹ which indicated a per turbine contribution of €8,000. Community/local wind farms also face a significant and unjustified increase to development contributions through the switch from a “per turbine” to a “per MW capacity.”

IWEA fails to see why the change has been made from a “per turbine” rate to a “per MW capacity” rate which significantly penalises wind energy, as no justification or reference is made for this sudden and significant change. IWEA also note that this dramatic change is not highlighted in the Explanatory Memorandum accompanying the draft Development Contribution Scheme.

If it is taken into consideration that the average megawatt capacity of an onshore commercial wind turbine is between 2.3 and 3 MW, the proposed development contribution levels of €10,000 per megawatt would therefore equate to between €23,000 and €30,000 per turbine.

- **For a standard 3MW turbine development contributions are being proposed to skyrocket from €8000 before the new Development Contribution Scheme to €30,000 under this new scheme.**
- **This wind energy increase of between 230% and 275% increase for a standard wind turbine stands in stark contrast and out of line to other similar type of infrastructure, which have seen either no increase from 2010 levels or a much more modest level of change under the draft Development Contribution Scheme.**
- **IWEA would call for this excessive development charge to be brought into line with the previous scheme by reverting back to the previous “per turbine” assessment methodology.**

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. Wind farm developments also provide community benefits as set out in the *IWEA Best Practice Principles in Community Engagement & Community Commitment, 2013*². 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.

As explicitly outlined in the [DoECLG Development Contributions Guidelines for Planning Authorities](#):

*“**Development contributions are not cash-cows**: there is an important balance to be struck between the funding of public infrastructure and the need to encourage economic activity and promote sustainable development patterns. It is essential that development contribution schemes do not impede job creation or facilitate unsustainable development patterns.”*

IWEA would also like to draw attention to the following requirement also contained within the same guidance³: *“Planning authorities **are required** to include the following in their development contribution schemes: Options for reduced charges in respect of renewable energy development to promote uptake of renewable energy technologies.”*

In that context IWEA believe that the scale of increase in **development contributions proposed for wind energy is wholly excessive and without recognition of the requirements of the current DoECLG guidance**. This scale of increase, is typically up to 275% for a standard turbine, where many turbines are now 3 megawatts as a standard, is also proposed without regard to the

existence of benefits from wind energy to the local Galway economy supporting rates, jobs and local investment.

We would welcome the opportunity to meet with you to further discuss. We would also finally propose that wind turbine linked development contributions should **be 'ring-fenced' for use directly in the local communities hosting the wind farm.**

Yours sincerely,

**Sent by email, without signature.*

Brian Dawson,
Head of Communications,
Irish Wind Energy Association.