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Planning Department,
Westmeath County Council,
Aras an Chontae,
Mount Street
Mullingar, Co. Westmeath

23rd March 2016

By email to variation1cdp@westmeathcoco.ie

Dear Forward Planning team,

RE: Proposed Draft Variation (No.1) to the Westmeath County Development Plan 2014-2020

The *Irish Wind Energy Association* (IWEA) welcomes the opportunity to comment on the Proposed Draft Variation (No. 1) **to the Westmeath County Development Plan 2014-2020 (CDP 2014)**. We have reviewed the Draft Variation including the Appropriate Assessment (AA) and Strategic Environmental Assessment (SEA) and make this submission in the context of the current Plan.

As the proposed Variation, if adopted, will significantly negatively impact on the viability of renewable energy for Westmeath, IWEA considers it critically important to make this submission on the proposed Draft Variation, and look forward to engaging constructively with Westmeath County Council on this important consultation.

From our experience of the operation of the existing CDP 2014 and indeed the CDP's of neighbouring Counties, IWEA has an insight into what has worked well in applying the current policies and objectives and how policy 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 meet our binding EU 2020 targets and our wider international obligations on combatting climate change.

IWEA is firmly of the view that clarity in strategic planning can help guide all stakeholders, 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 positive sustainable development of the area, therefore it is imperative that policy statements are robust and workable. We would ask why wind energy has been specifically singled out, as a cost effective renewable energy option for Ireland, for particular attention under this variation.

We would welcome the opportunity to discuss this submission in more detail at any stage.

Yours sincerely,
**sent by email, bears no signature*

Brian Dawson
Head of Communications,
Irish Wind Energy Association.

Executive Summary

Overview

- At the outset, we all must acknowledge Ireland's need to support renewable energy, which also stems from its EU commitments. These include 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. Ireland's target under the Directive is for renewable electricity to account for 40% of total energy consumption by 2020. Failure to meet these binding targets could result in EU sanctions. In line with these commitments.
- Wind energy contributes positively and significantly to the electricity supply of Ireland. Provisional EirGrid figures for 2015 show that 24% of Ireland's electricity demand was met directly from wind energy. Irish wind energy as an indigenous renewable energy is helping to cut our 85% import dependency, and in 2014 alone, according to the SEAI saved Ireland over €200m in energy imports as well as reducing our emissions from electricity generation by over 16%.
- IWEA would question why wind energy has been specifically singled out among sectors as the direct focus of this Variation considering that clear national Wind Energy Development Guidelines are cited within the CDP, and have been provided by Government specifically for the guidance of strategic and sustainable wind energy development.

Proposed Noise Limit

- A "night time noise limit of 30db of L night outside from wind energy developments" as proposed in the subject variation is a significant and unwarranted material deviation from the adopted 2006 Wind Energy Development Guidelines. In this regard it is important to take note of obligations under Section 28 (1B) of the Planning Act whereby County Council's must give clear reasons as to why, by reason of the nature and characteristics of Westmeath County, the above 2006 Guidelines cannot be implemented.
- The policy objective states that the limit applies "outside from wind energy developments", this is a vague definition, open to interpretation and in our view not enforceable. If the policy was to apply to the "edge of the wind energy development" (as suggested in the SEA Screening), this in itself is open to subjectivity, misinterpretation and is unenforceable as the planning boundary, wind farm boundary, landownership boundary etc. are all different boundaries which could significantly materially impact on the accuracy of measurement as applied.
- The proposed Variation if adopted could also significantly impact on the current 'exempted development' provisions of the *Planning & Development Regulations 2001 – 2015*, which gives a statutory right for the installation of 'Renewable Technologies' within Agricultural Landholdings and within the curtilage of Industrial Development and Domestic Residents.
- No comment is made in Section 5.1 of the SEA concerning the incompatibility of the proposed variation with national statutory guidance on noise assessments (WEG's 2006) and how the proposed variation could impact on the statutory development rights supported in the Irish statute for the erection of single turbines in domestic, industrial and agricultural holdings as detailed in Section 3.1 above.
- The *World Health Organisation (WHO)* guidance recommends a 40dB $L_{\text{night, outside}}$ and not a 30dB outside noise limit as proposed in the variation. Therefore the proposed Variation has no scientific reference or basis.

- The SEA Screening supporting the proposed Variation states that an outdoor noise limit of 40dBA “Generally equates to 30dBA noise level inside a dwelling or structure” (page 3, Section 2) and in this regard refers to the draft amendments to the WEG’s 2006 and the study by *Marshall Day Acoustics, 2013*, commissioned by the *Sustainable Energy Authority of Ireland (SEAI)*. There would appear to be a serious anomaly in the rationale for this 30dBA outside limit as proposed by Westmeath, as it does not reflect recommended internal noise levels both from the WHO or the commonly used British Standard applied in designing appropriate internal noise levels;

Noise Sensitive Receptors

- No sources of scientific research have been identified which supports a reduced noise level due to potential impact on horses, or indeed other animals. Therefore the classification of equine facilities as noise sensitive locations is at variance with national and international guidelines.

Area 7 Designation Changes

- The proposed Variation does not give an explanation as to why the change in designation to Area 7 is proposed. It is clear from the policies and objectives contained within the CDP 2014, that the Wind Energy Development Capacity Map (Map No. 5) is informed by the Landscape Character Assessment of the County as contained in Volume 2 of the Plan. We now ask the Council to consider how this change can be justified given that it appears that the Landscape Character Assessment has not been updated.

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 thermal or nuclear 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, as in 2015 alone, almost one quarter (24%) of our electricity demand was met by indigenous wind energy.

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.

At the outset, we all must acknowledge Ireland's need to support renewable energy, which also stems from its EU commitments. These include 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. 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 has 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%".

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. An approximate doubling of wind capacity will need to be installed on-shore in Ireland within the coming years if we are to meet our 2020 RES-E target. The expansion of the Irish wind industry will be an extremely positive economic development for the entire Country and, indeed, for Westmeath County. It 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.

Ireland's Transition to a Low Carbon Energy Future 2015-2030

The Government White Paper entitled 'Ireland's Transition to a Low Carbon Energy Future 2015-2030' has recently been published by the Department of Communications, Energy and Natural Resources (DCENR). This Paper provides a complete energy update and a framework to guide policy up to 2030.

The Paper builds upon the White Paper published in 2007 and takes into account the changes that have taken place in the energy sector since 2007. The White Paper states the advances in Ireland's energy efficiency and renewable energy and generation use between 2007 and 2015. Renewable energy sources (which include wind) accounted for nearly 25% of Ireland's electricity consumption in 2015, which is just over halfway to Ireland's 2020 target of 40%. The policy framework sets out a vision for a low carbon future that maintains Ireland's competitiveness and ensures a supply of affordable

energy. The paper advises that a range of policy measures will be employed to achieve this vision and will involve amongst many things, generating electricity from renewable sources of which there are plentiful indigenous supplies and increasing the use of electricity and bio energy to heat homes and fuel transport. The White Paper states that onshore wind continues to be the main contributor of energy (18.2% of total generation and 81% RES-E in 2014) and that a significant amount of additional onshore renewable generation capacity is likely to be required to achieve the 2020 target of 40% RES-E. To achieve this target the White Paper states that the average rate of build of onshore wind generation will need to increase up to 260 MW per year from the current rate of build which is stated by the White Paper at about 170 MW per year.

Relevant strategic policy documents, such as the current County Development Plan, must assist in enabling Ireland to develop its natural green energy resources and meet our EU2020 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. County Development Plan policies must also be consistent with national guidance. The importance of this is recognised in the recently adopted Planning & Development (Amendment) Act 2015 which states that Section 28 Ministerial Guidelines can in some instances have direct effect.

Proposed Variation

The Draft Variation states;

“That in order to protect human health and the quality of life of the population, Westmeath County Council will, within the provisions of the existing designations incorporate into its County Development Plan, a night time noise limit of 30db of L night outside from wind energy developments.

The proposed Variation also provides that Area 7 (CDP wind development map) be designated an area of low capacity in line with the rest of the county.

The Variation also proposes that registered equine facilities be regarded as noise sensitive receptors”

The IWEA would like to raise significant issues and concerns with the proposed variation on a number of factual grounds which we set out below;

Consistency of Policy Objectives contained within the County Development Plan & Statutory Ministerial Guidelines

We have serious concerns with the consistency of the proposed Variation with the current policies and objectives contained within the *Westmeath County Development Plan 2014*.

Policy Objective **P-WIN3** of the County Development Plan 2014 (CDP 2014) states that;

“To ensure the siting and development of wind turbines is carried out in accordance with the requirements of the DoEHLG Wind Energy Development Guidelines 2006, and as otherwise amended”

Furthermore there are a number of other supporting policies contained in the plan as outlined hereunder;

“To encourage the development of small-scale wind energy development and single turbines in urban and rural areas and Industrial Parks, provided they do not negatively impact upon environmental quality, landscape, wildlife and habitats or residential amenity” (P-WIN1)

“To strictly direct large-scale energy production projects, in the form of Wind Farms, onto cutover cutaway peatlands in the county, subject to environmental, landscape, habitats and wildlife protection requirements being addressed..” (P-WIN2)

“To promote, encourage and facilitate the provision of micro-renewable energy” (P-WIN4)

“To support small-scale community sponsored wind energy projects” (P-WIN5)

The above policies were adopted pursuant to Section 28 of the Planning & Development Act 2000 (as amended), having regard to the Wind Energy Guidelines 2006 which states; *“Noise limits should be applied to external locations, and should reflect the variation in both turbine source noise and background noise with wind speed”* and specifically to the subject Variation, Page 30 of the Statutory Guidelines state that;

“Separate noise limits should apply for day-time and for night-time. During the night the protection of external amenity becomes less important and the emphasis should be on preventing sleep disturbance. A fixed limit of 43dB(A) will protect sleep inside properties during the night”.

A *“night time noise limit of 30db of L_{night} outside from wind energy developments”* as proposed in the subject Variation is a significant material deviation from the adopted Ministerial Guidelines. In this regard we remind Westmeath County Council of their obligations under Section 28 (1B) of the Planning Act whereby County Council’s must state;

“how the planning authority has implemented the policies and objective of the Minister contained in the guidelines, when considering their application to the area or part of the area of the draft development plan and the development plan”,

or

“if applicable, that the planning authority has formed the opinion that it is not possible, because of the nature and characteristics of the area or part of the area of the development plan, to implement certain policies and objectives of the Minister contained in the guidelines when considering the application of those policies in the area or part of the area of the draft development plan or the development plan and shall give reasons for the forming of the opinion and why the policies and objectives of the Minister have not been so implemented”

It is our opinion that the proposed Variation does not comply with Section 28 of the Planning & Development Act as Westmeath County Council has not given reasons for the forming of the opinion as to why, by reason of the nature and characteristics of Westmeath County, the above 2006 Guidelines cannot be implemented and it has not set out why the policies and objectives of the Minister have not been so implemented.

Furthermore the draft Variation is not consistent with Policy Objectives **P-WIN3** of the CDP 2014 which requires compliance with the Wind Energy Strategy 2006. The proposed Variation also could have significant impacts on micro as well as large scale wind energy developments.

A significant issue also is the fact that the proposed noise limits are at variance to the current 'exempted development' provisions of the *Planning & Development Regulations 2001 – 2015*, which gives a statutory right for the installation of 'Renewable Technologies' within Agricultural Landholdings and within the curtilage of Industrial Development and Domestic Residents.

The statutory legal entitlement of landowners, homeowners, farmers and employment generating activities could be seriously prejudiced. Under Irish Statute a wind turbine can be erected within an agricultural landholding subject to "*Noise levels not exceeding 43db(A) during normal operation, as measured from the nearest habitable house*"¹. Class 56(c) allows for the installation of a wind turbine within a business premises subject to the "*Noise levels not exceeding 43db(A) during normal operation, as measured at the nearest party boundary*"². Most seriously, the proposed Variation is at significant variance to Class 2 (b) where it is a 'property right' to erect within the curtilage of a house a wind turbine, subject to the noise level not exceeding "*43db(A) during normal operation, or in excess of 5db(A) above the background noise, whichever is greater, as measured from the nearest neighbourhood inhabited dwelling*"³

Furthermore, the policy objective states that the limit applies "*outside from wind energy developments*", this is vague, open to interpretation and in our view not enforceable in its current format. The supporting SEA Screening Report clearly identifies this ambiguity in **Section 2.2 Implications for planning policy of the proposed variation** where it states "*The proposed Variation also implies that the measurement would be taken from the edge of the wind energy development, rather than at the boundary of the noise sensitive receptor.*" If the policy was to apply to the "edge of the wind energy development", this in itself is open to subjectivity, misinterpretation and is unenforceable as the planning boundary, wind farm boundary, landownership boundary etc. are all different boundaries which could significantly materially impact on the accuracy of measurement as applied.

SEA Methodology

The purpose of SEA screening is to determine whether the plan or variation is likely to have significant effects on the environment. The SEA correctly adheres to the requirements for appraisal contained in Schedule 2 of the SEA Regulations. However, section 5.1 of the SEA Screening Report in considering the "probability, duration, frequency and reversibility of the effects" concludes that the "*significance of this effect cannot be established without a more detailed assessment of local conditions across the County*". No comment is made in Section 5.1 of the SEA concerning the incompatibility of the proposed variation with national statutory guidance on noise assessments (WEG's 2006) and how the proposed variation could impact on the statutory development rights supported in the Irish statute for the erection of single turbines in domestic, industrial and agricultural holdings as detailed above.

Furthermore, Section 2 of the SEA is in our view over-reliant on outdated third party reports, recommendations, and heavily reliant on recommendations contained in the non-statutory draft guidelines proposed to amend the WEG's 2006. It is important to note that the amendments to the WEG's 2006 do not have statutory effect. Furthermore, there a number of anomalies in the interpretation of the Marshall Day Acoustics (MDA) report in both the proposed revisions to WEG's 2006 and the proposed Variation.

The MDA report recommends "*that absolute noise limits be strongly considered for incorporation into revised noise assessment guidance*". However, there is no clear recommendation in the MDA report

¹ Class 18(b), Part 2, Schedule, Schedule 1, Planning & Development Regulations 2001 - 2015

² Class 56(c), Part 1, Schedule 1, ibid

³ Class 2(b), ibid

on a numerical value of the absolute noise limit. Instead, a noise limit range of 35 to 45dB is quoted. Consequently, the statement in the proposed revision to WEG's 2006 *"The Marshall Day review indicates that 40dBA is commonly used in different countries as an absolute limit"* is unsubstantiated.

On review IWEA considers that the measurements being used in relation to noise limits are not consistent or equivalent. It is essential to ensure that appropriate measurements are used in a consistent way.

Similarly, for the reasons outlined above, the statement in the SEA Screening Report outlined below is also unsubstantiated:

"The noise, proximity and shadow flicker aspects of these Guidelines are currently being reviewed (DECLG, 2013). Significantly, the proposed noise revisions adopt the recommendations set out by the World Health Organisation (2009) and consultants commissioned by the Sustainable Energy Authority of Ireland (Marshall Day Acoustics, 2013). These recommend a daytime and night-time outdoor noise limit of 40dBA at noise sensitive properties."

IWEA reiterates that basing the variation on **Draft** Wind Energy Guidelines which have not been finalised or adopted by Government is not appropriate. Even if the amendments to the WEG's 2006 were adopted in their current format, the proposed Variation would be at Variance with the draft amendments, this is recognised in the SEA where it is stated in Section 2.2 that;

"Notably, the proposed noise limit is more onerous than that which was proposed in the consultant report (Marshall Day Acoustics, 2013) for the ongoing review of the current Planning Guidelines for Wind Energy Development. The proposed Variation also implies that the measurement would be taken from the edge of the wind energy development, rather than at the boundary of the noise sensitive receptor".

Again, there is an anomaly in the interpretation of the MDA review as there is no clear recommendation in the MDA report on an absolute noise limit.

In this regard we note the recently adopted *Planning & Development (Amendment) Act 2015*. Section 28 (1C) of the Act states that where Guidelines include *"specific planning policy requirements to be applied"* the Planning Authority must apply them directly. We submit adopting the proposed variation as currently presented will conflict with Section 28(1C) of the Planning & Development Act and therefore could instigate a Ministerial Direction pursuant to Section 29 of the Planning & Development Act.

Technical Concerns

The basis of the night-time limit is not provided in the Written Statement, however examining the SEA Screening documents it is assumed that a similar unsuccessful Draft CDP variation released in May 2015 provides the background to the proposed 30dB $L_{\text{night, outside}}$ limit proposed.

The *World Health Organisation (WHO) 'Night Noise Guidelines For Europe' (2009)* guidelines proposes a 40 dB $L_{\text{night, outside}}$. The proposed Variation however applies a 30dBA noise level not just outside the property but potentially at the boundary of the wind farm development. It is submitted that this significant proposed curtailment is flawed and lacks any foundation based on expert study and experience.

It would appear that the 30dB limit was perhaps taken from an older WHO report, instead of the above referenced 2009 WHO Report. If the proposed variation is to progress, we respectfully request the Council to provide clarity on the foundation and basis for the subject proposed noise limit.

The most relevant World Health Organisation guidance recommends a 40dB $L_{\text{night, outside}}$ and not a 30dB outside noise limit as set out below;

“For the primary prevention of subclinical adverse health effects related to night noise in the population, it is recommended that the population should not be exposed to night noise levels greater than 40 dB of $L_{\text{night, outside}}$ during the part of the night when most people are in bed. The LOAEL of night noise, 40 dB $L_{\text{night, outside}}$, can be considered a health-based limit value of the night noise guidelines (NNG) necessary to protect the public, including most of the vulnerable groups such as children, the chronically ill and the elderly, from the adverse health effects of night noise.” (Page XVIII, WHO 2009 guidelines (Exec Summary).

IWEA is clear that by inappropriately citing and applying the WHO 2009 guidelines, Westmeath County Council is not observing the most up to date advice from the WHO.

There is a well-established route for dealing with noise nuisance through the Environmental Protection Agency (EPA) Act 1992. A numerical limit, such as is proposed in this variation will not address factors contributing towards annoyance such as sound perception.

The SEA Screening supporting the proposed Variation states that an outdoor noise limit of 40dBA “Generally equates to 30dBA noise level inside a dwelling or structure” (page 3, Section 2) and in this regard refers to the draft amendments to the WEG’s 2006 and the study by *Marshall Day Acoustics*, 2013, commissioned by the *Sustainable Energy Authority of Ireland (SEAI)*. There would appear to be an anomaly in the rationale for this 30dBA internal limit as it does not reflect recommended internal noise levels both from the WHO or the commonly used British Standard applied in designing appropriate internal noise levels;

- WHO Guidelines for Community Noise (1999): 30dB L_{Aeq} for prevention of sleep disturbance inside bedrooms
- British Standard 8233:2014 Guidance on sound insulation and noise reduction for buildings: It is desirable that indoor ambient noise levels for sleeping do not exceed 30dB $L_{\text{Aeq, 8 hour}}$

Note: Both the WHO guidelines and British standard assume that the noise reduction from outside to inside with the window partly open is 15dB. Hence, the outside noise levels would be 45dB L_{Aeq} and 45dB $L_{\text{Aeq, 8 hour}}$ for WHO Guidelines and BS 8233:2014, respectively.

Benchmarking of recommended external and internal night-time noise levels show that the proposed variation of a 30dB $L_{\text{night, outside}}$ limit will unnecessarily restrict wind energy development during night-time hours to levels much lower than are recommended.

In addition, the actual implementation of the proposed 30 dB $L_{\text{night, outside}}$ limit should be examined in greater detail. The current form of the limit would require all wind energy developments to comply with a $L_{\text{night, outside}}$ value, requiring measurements to be taken for 8-hour periods over every night of the year. This would be an expensive exercise as measurements will need to be taken at several locations depending on the wind development size

Inclusion of Registered Equine Facilities as Noise Sensitive Receptors

“The Variation also proposes that registered equine facilities be regarded as noise sensitive receptors.”

In Ireland, noise sensitive receptors are defined in the Environmental Protection Agency's noise guidance notes for licensed facilities as;

“any dwelling house, hotel or hostel, health building, educational establishment, place of worship or entertainment, or any other facility or other area of high amenity which for its proper enjoyment requires the absence of noise at nuisance levels.” .

The Wind Energy Development Guidelines 2006 states that

“a noise sensitive location includes any occupied dwelling house, hostel, health building or place of worship and may include areas of particular scenic quality or special recreational amenity importance.”

It is not clear as to why Equine facilities have been singled out within this variation. The purpose of describing equine facilities as noise sensitive receptors is not defined in the proposed Variation. No sources of scientific research have been identified which supports a reduced noise level due to potential impact on horses.

A summary of some sample identified research is as follows;

- Horses in stables exposed to $L_{Aeq,15min}$ of 54-70 dB generally show little response to music noise unless the noise is particularly impulsive⁴.
- Horses under the flight path of Christchurch International Airport where noise levels are in excess of 90 dB (L_{Amax}) showed little “recognition” of an aircraft pass over⁵.

If the purpose of the limit is for amenity protection, IWEA would question whether equine facilities would have any particular recreational amenity value. On this basis and the information above, IWEA would consider that there is no justification for including equine facilities as noise sensitive locations.

Designation of Area 7 as ‘area of low capacity’

The County Development Plan includes a Wind Energy Development Capacity Map, (Map No.5), which highlights areas of the County which would be open for consideration for wind energy development. This is informed by the Landscape Character Assessment of the County contained in Volume 2 of the County Development Plan. The Map designates the Western Lowlands as the only area in the county with “medium capacity” for wind energy development. It also designates Uisneach as an area of no capacity for wind energy development. All other areas of the County are designated as “low capacity” for wind energy development.

The proposed Variation now proposes to change the medium capacity designation of the Western Lowlands (Area 7) to a “low capacity” designation. This would mean that all areas of the County would then be designated as either “low” or “no” capacity for wind energy development.

The proposed Variation does not give an explanation as to why the change in designation is proposed.

It is clear from the policies and objectives contained within the CDP 2014 that the Wind Energy Development Capacity Map (Map No. 5) is informed by the Landscape Character Assessment of the

⁴ (Huybregts, N. 2008., Protecting Horses from Excessive Music Noise - A Case Study)

⁵ (Marshall Day Acoustics, 10 March 2014, Summary of Research of Noise Effects on Animals, Document No.: Mm 00X)

county as contained in Volume 2 of the Plan. We now ask the Council how this change can be justified given that it appears that the Landscape Character Assessment has not been updated.

If adopted, the proposed Variation will have a significant negative impact on a broad scale of wind energy developments including small scale wind farm developments and community based projects and effectively gives the impression that Westmeath is 'closed for business' in the on-shore renewable energy sector, and will not contribute to the need to reduce the nation's dependence on on-renewable sources of energy.

Conclusion

IWEA welcomes the opportunity to comment on the Draft Variation to the CDP 2014. Policy Objectives and variations to same should be conceived and adopted in an appropriate manner. This can be achieved by adopting informed, measurable and deliverable objectives.

The importance of adopting clear factual policies and a detailed 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.

The proposed Variation has no foundation, lacks an appropriate methodology and is at significant variance to national and international guidelines. Again IWEA would ask on what basis wind energy has been singled out for attention as a sector for this proposed variation.

We therefore respectfully request Westmeath County Council to reconsider this variation process and to assume a leadership position regarding wind and renewable energy development and Westmeath's contribution to the National Renewable Energy targets. We are clear that this kind of renewable energy leadership can bring significant benefits to the County.

The inclusion of the proposed Variation within the Country Development Plan will unnecessarily and inappropriately restrict the implementation of national and local policy to generate additional electricity from renewable sources and artificially restrict the number and range of sites that could be brought forward that would otherwise satisfy all the other requirements of the County Development Plan, National Guidelines and the requirements of proper planning and sustainable development.

Climate change is a global issue and is a matter for all levels of Government to address from an international to a local level. The inclusion of this Variation will unnecessarily prevent the full potential of County Westmeath's renewable energy and wind energy resources being harnessed, and would be misaligned with the other policies and provisions within the Draft Plan that support the development of renewables.

IWEA would like to offer to meet directly with officials from Westmeath County Council to further discuss the detail of this submission.