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Millennium Park,
Osberstown,
Naas, Co. Kildare

Senior Executive Officer,
Forward Planning Section
Ára Chill Dara,
Devoy Park,
Naas, Co. Kildare.

20th May 2015

Re. Co Kildare Development Plan Review

Dear Co. Kildare Forward Planning Team,

The Irish Wind Energy Association (IWEA) welcomes the opportunity to comment on the forthcoming review of the current County Development Plan. We have reviewed the provisions of the current Development Plan and the matters raised in the Issues Paper, which was published to stimulate discussion in the review process.

This is the pre-draft stage of the new County Development Plan and all submissions will help to inform the vision, objectives and policies of the new County Kildare Development Plan 2017-2023. Therefore, we feel it is critically important to make our submission at this stage and we look forward to engaging constructively with the Council in the future.

IWEA would like to reiterate that we welcome Kildare County Council's positive support of renewables and wind energy in particular. 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.

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,

**sent by email, bears no signature*

Brian Dawson,
Communications Manager,
Irish Wind Energy Association.

Introduction

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 the primary renewable energy resource.

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. However, the IWEA naturally supports proper planning and sustainable development and recognises that development of wind energy projects must take account of other environmental issues, not least the potential impact on local residents and the natural heritage. A balance has to be struck to give appropriate and necessary protection to the local environment, while considering the improvements to the global environment. Relevant policy documents, such as the new 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, naturally, have a keen interest in policy formulation.

EU Commitments and DCENR's RES-E target

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, 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 has announced a revised 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 Kildare 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.

Renewable Energy Policy Context

IWEA welcomes Kildare County Council's recognition in its Issues Paper that "*Kildare has the potential to generate a proportion of its power requirements from renewable sources*". In terms of the specific question posed in the Paper on where wind energy should be encouraged or discouraged, this will, naturally, be dictated by a number of important factors that should form the basis of the Wind Energy Strategy that the Council is proposing to prepare.

The preparation of a Wind Energy Strategy is seen as key to the delivery of wind energy developments at appropriate locations. The preparation of such a Strategy should adopt an opportunities and constraints based approach to ensure that the wind energy potential of the County is maximised, whilst the potential for environmental impacts are minimised. IWEA suggests that, as well as providing the geographical context for wind energy policy in the County, the Strategy should also include clear targets for wind energy production, based on an over-arching objective to maximise the renewable energy potential of the County. IWEA would also strongly suggest that this plan would be developed in accordance with the Methodology for Local Authority Renewable Energy Strategies (LARES)¹ as developed by the Sustainable Energy Authority of Ireland (SEAI) at the request of Local Authorities would be utilised.

The current County Development Plan includes policies and objectives that generally support wind energy development. Indeed, a key aim of the current Plan is to support and maximise indigenous renewable energy production. This is, of course, welcomed and it is hoped that the new County Development Plan will extend this support and deliver a Wind Energy Strategy. In this regard, the current Plan's objective is merely to "*examine the possibility of designating appropriate areas of the county as being suitable for the production of wind energy*" (ENO 1). It is hoped that the new strategic Plan will give a strong commitment to preparing a specific wind or renewable energy strategy.

The current Plan sets out, in Policy WE2, the key considerations in assessing wind energy proposals. These are largely focussed on the environmental considerations around development. We consider that in addition a detailed consideration should also be given to the opportunity potential of the wind resource itself in line with advancing technologies in wind turbine design. The new Strategy should clearly set out the adopted methodology in arriving at areas designated as preferred/strategic for wind energy development and, conversely, those areas where such development would not be encouraged.

The preparation of a clear strategy, targets and identification of geographical areas where wind energy development is encouraged or permissible is necessary for all affected parties. This provides a greater degree of certainty for the wind industry and, indeed, for local residents and other local groups. It also provides clarity for the Planning Authority (and An Bord Pleanála) to facilitate the proper and consistent assessment of such development proposals. Many other Councils have prepared renewable/wind energy strategies and these provide essential and clear direction for the industry, in its widest sense. Again, we want to welcome the Council's commitment to prepare a Wind Energy Strategy and we suggest that the methodology is similar to that recently used by other Councils, such as Galway, Mayo and Clare. These Councils have prepared detailed strategies using a clear and logical approach and these now form part of the relevant County Development Plans. The strategies are invaluable for all concerned in the wind energy sector and the wider public and they achieve an appropriate balance between harnessing the natural resource, and safeguarding the local environment.

The inclusion of specific policies and objectives in the new County Development Plan that promote the further development of renewable energy will enable Kildare County Council to:

¹ http://www.seai.ie/Publications/Renewables_Publications_/Wind_Power/Methodology-for-Local-Authority-Renewable-Energy-Strategies.pdf

- Develop a sustainable, wind energy industry employing construction and professional service providers and attracting significant capital investment;
- Enhance the vibrancy of the county as a renewable energy leader;
- Support rural development in a sustainable manner;
- Deliver significant community benefit and,
- Deliver significant commercial rates revenue to County Kildare annually.

IWEA recommends that the new County Development Plan and the future Wind Energy Strategy take all due cognisance of EU and national energy policy and targets. In addition, the Strategy should be prepared in accordance with the SEAI document entitled *“A Methodology for Local Authority Renewable Energy Strategies”*.

Conclusion

IWEA is hopeful that the new County Development Plan will contribute to supporting the sustainable and strategic development of the wind resource in the County. This is a valuable opportunity for Kildare County Council, by taking a proactive approach, to realise, in an appropriate manner, the wind energy development potential of the County and to adopt policies and objectives that enhance sustainable development. The importance of adopting clear 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.