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Louth County Council,  
Forward Planning Department,  
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Date: 17<sup>th</sup> December 2014

Dear Sir/Madam,

**Re: “Draft Louth County Development Plan 2015 - 2021”**

The Irish Wind Energy Association (“IWEA”) welcomes the opportunity to comment on the **Draft Louth County Development Plan 2015-2021**.

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 renewable energy, and in particular wind energy. As this Development Plan will aim to direct the future growth of County Louth over the medium to long term and assist in the assessment and decision making of planning applications for wind energy developments, IWEA very much welcomes the opportunity to comment on the proposed Draft County Development Plan and remains at the disposal of the forward planning section should you wish to contact us in relation to any specific aspect of this submission.

IWEA made a submission to both the:

- Issues paper for the “Renewable Energy Strategy for County Louth” dated 6<sup>th</sup> March 2013; and
- Review of Louth County Development Plan “County Louth’s New Development Plan 2015 – 2021 Issues Paper” dated 10<sup>th</sup> January 2014.

We reiterate the comments made in these submissions as they are applicable to this Draft County Development Plan submission.

Yours sincerely,

\*sent by email, no signature required

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**Caitríona Diviney**  
Chief Operating Officer  
Irish Wind Energy Association

## **1.0 Introduction**

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 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. IWEA supports proper planning and sustainable development and recognises that development of wind energy projects must afford clear protection to residents while enabling Ireland to develop our huge natural clean energy renewable 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.

While we welcome all of the Renewable Energy Policies of Draft Louth County Development Plan 2015-2021 the manner in which they seek to demonstrate Louth County Council’s recognition of the importance of renewable energy, we have concerns regarding how these Policies will be achieved in order to contribute towards the national renewable energy targets.

### **1.1 EU commitments and DCENR’s RES-E target**

In the first instance, we wish to remind Louth County Council of Ireland’s need to support renewable energy also stems from it’s 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, DCENR 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 a further series of targets for renewable energy towards 2030 and Ireland in October 2014 agreed to new 2030 targets which seek a 40% reduction in Green House Gas Emissions and a binding EU target for renewable energy of “at least 27%”.

### **1.2 Benefits of wind energy development to Louth County Council**

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 additional 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 Co. Louth and will result in greater grid security and stability, job creation, Local Authority rates and development contributions, lower energy prices and will bring about a reduction of GHG emissions.

County Louth has **4.7MW** of wind energy capacity installed, which represents only 0.16% of the total installed capacity on the island of Ireland (2,889MW)<sup>1</sup>.

## **2.0 Renewable Energy**

### **2.1 Louth County Council Renewable Energy Strategy (RES)**

IWEA warmly welcomes the clear statement within the Draft CDP under section 9.4, *“As a Planning Authority, it is important that Louth County Council recognises the range of new and developing technologies that can contribute to minimising greenhouse gas emissions, providing for a secure and stable energy supply and securing a greater proportion of our energy from renewable sources.”*

IWEA support Policy EnCo12 set out at Section 9.4 “Renewable Energy”: *“The Council will aim to produce a Renewable Energy Strategy for County Louth during the lifetime of this development plan.”*

IWEA note the delay in progressing Policy EnCo12 and would call for the work on this Renewable Energy Strategy to be progressed at the earliest possible opportunity within the clear framework provided for by the Department of the Environment.

### **2.2 Renewable Energy Policies**

IWEA welcome the renewables energy policies cited at EnCo 8 – EnCo12. IWEA wish to reiterate that when preparing the Renewable Energy Strategy, that it should be prepared in accordance with SEAI document entitled *“A Methodology for Local Authority Renewable Energy Strategies”*.

Furthermore the RES should have regard, among others things, to both the level of the wind resource **and** also the continuing technological developments in hub heights and rotor diameter being offered by turbine manufacturers, which allow the resource in less windy inland sites to also be exploited. Other factors include the nature of landscape, and the status of the surrounding lands and the Department of the Environment’s Wind Farm Planning Guidelines 2006 (currently under a targeted review).

### **3.0 Wind Energy – Section 9.4.1**

At paragraph 9.4.1, it is stated *“It is possible that future large scale wind generation may be located off the Louth coast as opposed to inland locations.”* **IWEA request that this overly general, unquantified and unfounded statement be deleted from the draft development plan particularly in the absence of a detailed Renewable Energy Strategy.**

IWEA advocates that all planning applications for wind energy development within areas identified as “Preferred Areas” and “Areas Open to Consideration” be assessed on a case-by-

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<sup>1</sup> <http://www.iwea.com/windstatistics>

case basis. All wind farm development applications will be subject to an Environmental Impact Assessment (EIA), Natura Impact Statement (NIS) and will be screened for an Appropriate Assessment (AA), the findings of which will determine the suitability of the proposal relative to any potential environmentally sensitive receptors.

#### **4.0 DoEHLG Wind Energy Planning Guidelines, 2006**

At Section 9.4.1, the Draft Development Plan sets out a synopsis of the technical update proposals to the Wind Energy Guidelines. IWEA would request that until final resolution of the technical update to the DoEHLG Wind Energy Guidelines that any reference to the Department's Guidelines within the forthcoming County Development Plan are referenced as follows:

*"Wind Energy Developments must meet the requirements and standards set out in the DoEHLG Wind Energy Development Guidelines 2006, or any subsequent related Guidelines."*

#### **5.0 Grid**

IWEA welcomes the support provided at section 9.2 of the Draft Plan which states that *"Louth County Council will support the reinforcement of the electricity transmission grid to improve energy supply to the county. Where strategic route corridors have been identified, the council will support the statutory and other providers of national grid infrastructure by safeguarding such corridors from encroachment by other developments that might compromise the provision of energy networks."*

However, IWEA have a concern in relation to **Policy EnCo4**, *"To require the under-grounding of electrical cables within new residential, commercial or civic developments"*

IWEA would like to highlight the importance of the development of grid infrastructure. We consider that the full range of alternatives which are feasible for the development of transmission infrastructure should be given full consideration and evaluation, and only at that stage can a balanced judgement be formed on the acceptability of a particular proposal.

Furthermore there should be an onus on the transmission operator to review new developments in technology performance to ensure that its consideration of alternative technologies is up to date and consistent with best international practice. The industry would have a concern to ensure that the Development Plan as proposed is not overly prescriptive and that flexibility is provided to allow for the 'best fit' solution in each case.

#### **6.0 Green Infrastructure Strategy (GIS)**

Appendix 14 of Volume 2 of the Draft County Development Plan sets out a Green Infrastructure Strategy. IWEA would note that this strategy is silent on renewable energy and consider that it would be appropriate to support renewable energy within the Green Infrastructure Strategy for the County.

#### **7.0 Natura Impact Report and Map 9.1 "Areas suitable for Wind Energy Development**

IWEA notes that the Draft County Development Plan underwent a Habitat Directive Assessment (HDA), under the provisions of Article 6(3) of the Habitats Directive 92/43/EEC;

which now forms part of part of the public consultation along with the SEA, Environmental Report.

IWEA note that the boundaries of the Natura 2000 Sites define the boundaries of the “No-Go” designations defined in Map 9.1 “Areas suitable for Wind Energy Development”. IWEA and all of its members are committed to ensuring that any new development proposals located within or adjacent to Natura 2000 sites are plan-led, site sensitive, sustainable and designed to meet the stringent requirements set down in the in the Birds and Habitats Directives and the associated Regulations & Guidance to protect these sites, and to ensure that no adverse impacts occur as a results of such proposals

IWEA is clear that there should be no blanket prohibition of development in or adjacent to Natura 2000 sites. The exclusion of these areas runs contrary to specific EU Commission advice on the implementation of Natura 2000 regulations which states that:

*"The Habitats Directive does not, a priori, exclude wind farm developments in or adjacent to Natura 2000 sites. These need to be judged on a case by case basis."*

In line with the Natural 2000 guidelines, IWEA strongly believe that the placement of Natura 2000 sites should be considered as areas “Open to Consideration” as opposed to “No-Go” Areas as these sites would be subject to rigorous protection under the applicable legislation which is applied on a case-by-case basis in accordance with best practice, taking into consideration the merits of the individual proposal and also assessing the proposal in combination with other proposals and spatial considerations which have the potential to impact on Natura 2000 sites.

## **8.0 Landscape Character Assessment**

IWEA would welcome an objective in the forthcoming Louth County Development Plan 2015 - 2021 that the existing Landscape Character Assessment 2002 is updated following the publication of the proposed National Landscape Strategy.

## **9.0 Conclusion**

IWEA welcomes the opportunity to engage in this consultation process. We trust that this submission will inform the final Draft Louth County Development Plan 2015 – 2021 and we look forward to any further opportunities to contribute to the County Development Plan preparation process.

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<sup>i</sup> [http://ec.europa.eu/environment/nature/natura2000/management/docs/Wind\\_farms.pdf](http://ec.europa.eu/environment/nature/natura2000/management/docs/Wind_farms.pdf)