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19<sup>th</sup> August 2016

**Re: Draft County Leitrim Development Contribution Scheme 2016 – 2019**

The Irish Wind Energy Association (“IWEA”) is Ireland’s largest 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 Irish renewable energy resource. IWEA members are involved in more than 85% of the wind farm capacity planning to build from now to 2020 and wind energy today delivers over a fifth of Ireland’s electricity annually.

IWEA welcomes the opportunity to respond to the consultation on the Draft County Leitrim Development Contribution Scheme 2016 – 2019. We would also welcome the exemption for renewable energy projects of under 0.5MW as a display of positive support for renewable generation from Leitrim County Council.

IWEA has, however, strong concerns regarding the proposed contributions for renewable energy developments. The proposed contribution for wind farm developments of €6,000 per MW, subject to minimum of €15,000 per turbine, marks a dramatic rise in development contribution levels since the previous rate of €8,666.40 per turbine, or €2,888.80 per MW, where the standard turbine capacity is taken as 3 MW.

This payment for commercial wind turbines in Leitrim would represent a significant increase for a standard 3MW turbine, which, under the proposed new development contribution level of €6,000 per MW, would amount to an **€18,000** charge per turbine. **This represents an unjustified and wholly excessive increase of 108% for a standard 3MW wind turbine.**

IWEA notes that the current *Leitrim County Development Plan 2015-2021*<sup>1</sup>, commits to support the development of renewable energy, and specifically under Council Policy number 3 (a) commits to: -  
*“Maximise the use of renewable energy in County Leitrim”.*

Policy number 3 e) commits to: -

*“Increase community led schemes to develop wind farms within the County”.*

Section 4.3.12, “SUSTAINABILITY CRITERIA”, states: -

*“The use of renewable energy sources such as solar energy, geothermal resources, wind, biomass and small-hydro electrical schemes, as integral parts of new developments, extensions and restoration projects (commercial and private) will be encouraged”*

IWEA believes that this significant Development Contribution rise runs contrary to the existing provisions of Leitrim’s current County Development Plan, as this scale of increase in the proposed development contribution rates could impair both community and commercial wind and other renewable energy developments in the county. **Therefore, IWEA calls for this excessive development charge to be reverted to the previous lower rate of €8,666.40 per turbine, for Leitrim County Council.**

Every new wind farm development provides a substantial contribution to the local and national economy through local direct investment, 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*<sup>2</sup>. More wind energy on the system will also result in lower and more stable electricity prices for consumers while helping us achieve our energy and climate targets.

As outlined in the Government 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 Government Development Contribution Guidelines for Planning Authorities<sup>3</sup>: *“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.”*

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<sup>1</sup> [http://www.leitrimcoco.ie/eng/Services\\_A-Z/Planning-and-Development/Planning-Archive/Vol-1-Written-Statement\\_.pdf](http://www.leitrimcoco.ie/eng/Services_A-Z/Planning-and-Development/Planning-Archive/Vol-1-Written-Statement_.pdf)

<sup>2</sup> <http://www.iwea.com/iweabestpracticeprinciplesinco>

<sup>3</sup> <http://www.environ.ie/en/Publications/DevelopmentandHousing/Planning/FileDownload,32162,en.pdf>

In that context, IWEA believes that the scale of **development contributions proposed for wind energy in Leitrim is excessive and without recognition of the requirements of the current Government guidance.**

**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.*

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