



Sycamore House,
Millennium Park,
Osberstown,
Naas, Co. Kildare

Ms. Janet McNamara,
Administrative Officer,
Planning Section,
Sligo County Council,
City Hall,
Sligo

30th November 2016

Via online portal

Re: Draft Sligo County Development Plan 2017-2023

Dear Ms McNamara,

The Irish Wind Energy Association (IWEA) welcomes the opportunity to comment on the Draft County Development Plan. We have reviewed the provisions of the current Development Plan and the matters raised in the Draft Development Plan Consultation.

This is the Draft stage of the County Development Plan and all submissions will help to inform the vision, objectives and policies of the new Sligo County Development Plan 2017-2023. 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 Sligo 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 draft stage consultation and we look forward to contributing further as the strategic plan progresses.

Yours sincerely,

**sent by email, bears no signature*

Stella Burke

Irish Wind Energy Association.

1. 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. Wind energy is delivering for Ireland and in 2015 met 22.8% of our electricity demand.

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, and recognises that development of wind energy projects must take account of the full range of environmental and community issues.

Relevant strategic 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 and developing 2030 targets. IWEA members are involved in developing more than 85% of the windfarm 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.

2. EU Commitments and DCCAE'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. 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, DCCAE 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 Sligo 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.

3. Renewable Energy Policy Context

The current Sligo County Development Plan includes policies and objectives that offer support to wind energy development. In our previous submission we welcomed the clear statement within the existing plan as stated in **P-REN-1** to *“Support and promote a move away from fossil-fuel energy production through investment in renewable energy.”* While we would like to see this restated within the new CDP, we welcome the acknowledgement in **Section 10.6 Climate Change** that *“Energy efficiency and the use of renewable energy help to reduce GHG emissions and therefore play a key role in tackling climate change.”*

IWEA would furthermore note policy **P-REN-2** of the current Development Plan, which states that the approach is to: *‘Encourage and facilitate the sustainable production of energy from renewable sources, energy conversion and capture in forms such as wind power, hydro-power, wave generated energy, biomass, solar technology and energy-efficient building design/ servicing.’* IWEA supports this proactive and positive approach to renewable energy in the county, and would like to see this included in the new County Development Plan reinforcing support for wind and renewable energy throughout the County.

IWEA also notes that in the current Development Plan, Objective – **O-REN-1** – which states that the approach of the plan is to: *‘Identify and map, during the lifetime of this Plan (subject to resources), areas within the County where there is significant wind energy potential and where energy development would be acceptable in principle, subject to visual, landscape, heritage, environmental and amenity considerations’.* IWEA proposes the development of a Renewable Energy Strategy to help with this aim, and seeks to utilise the counties significant renewable energy resource within a clear and strategic approach. Sligo currently holds approximately 50MW of installed wind energy capacity, and in line with neighbouring counties, holds the potential to further develop this natural resource for local benefit.

The preparation of a Renewable or Wind Energy Strategy is seen as key to the delivery of wind and renewable energy developments at appropriate locations. IWEA would welcome the preparation of such a Strategy within Sligo. Such a strategy should adopt an opportunities and constraints based approach to ensure that the wind energy potential of the County is maximised, whilst ensuring a clear strategic and environmentally sensitive approach. IWEA suggests that, as well as providing the geographical context for wind and renewable energy policy in the County, the strategy should also include clear targets for wind energy production as has been adopted in other western counties such as Galway, based on an over-arching objective to maximise the renewable energy potential of the County. IWEA also strongly suggests 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 Plan sets out the key considerations in assessing wind energy proposals. These are largely focussed on the provisions of the current Wind Energy Guidelines published by the Department of Housing, Planning, Community and Local Government (Previously the Department of Environment, Community and Local Government). We consider that, in addition, 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 Development Plan 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 to ensure clarity for all 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.

4. Observations and Recommendations

IWEA welcomes the statement made in the Draft Sligo CDP 2017-2023, in section 11.1.2 *Wind energy*, in support of wind energy: “Sligo’s mountainous landscape and exposed location on the western seaboard combine to create good conditions for the generation of wind power.” We strongly agree that the development of wind energy should be carried out in an environmentally sustainable manner and with due respect to local communities, however, that there is also a need to “respond to government policy on renewable energy”. In addition, IWEA welcomes that the Draft CDP acknowledges the need to tackle climate change in section: 10.6 *Climate change*: “Energy efficiency and the use of renewable energy help to reduce GHG emissions and therefore play a key role in tackling climate change.”

IWEA welcomes the Strategic energy policy SP-EN-2 which is to: “Facilitate the sustainable production of energy from renewable sources, energy conversion and capture in forms such as wind power, hydro-power, wave generated energy, bioenergy, solar technology and the development of Waste to Energy/Combined Heat and Power schemes at appropriate locations and subject to compliance with the Habitats Directive.”

The Draft Plan goes on in Section 11.1 to acknowledge the renewable energy commitments that have been undertaken at a national and European level and that meeting national renewable energy targets requires local action. Moreover, Section 11.1 of the Draft Plan recognises that Sligo County is rich in renewable energy resources and “*is well-placed to lay solid foundations for a sustainable energy future*”.

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

Section 11.1.7 Electricity transmission, the draft plan states “The transmission network forms the backbone of power supply. Its development is critical to ensuring that County Sligo has the necessary infrastructure and capacity to attract business and accommodate the future development of the local economy.” We note and support this for the essential economic development of County Sligo.

Chapter 11, *Energy and Telecommunications*, sets out the Council’s policies in regard to renewable energy, including wind energy. IWEA welcomes that Sligo Council makes specific reference to the Wind Energy Development Guidelines (2006 Chapter 11, Section 11.1.2).

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

- 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 Sligo annually.

IWEA recommends that the new County Development Plan and 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*”.

Finally, from an environmental perspective, and in terms of climate change mitigation measures, IWEA would urge Sligo County Council to consider the issues of repowering and co-location of windfarms. The consideration of renewable energy sites as long term assets is essential, and can lead to greater efficiencies and use of existing infrastructure. The circular strategy of “Re-use – Remanufacture – Recycle” should be a fundamental consideration in future planning policy and decisions, ensuring that an asset can be refurbished, repaired, repowered and as a last resort decommissioned, with component parts recycled as appropriate.

The County Development Plan should contain a proactive approach to the co-location of other forms of low carbon generation or technologies which may increase the efficiency of any existing renewable technology, including potentially changes to the layout of the existing assets to accommodate this. Co-location of generation sources would enable more efficient, lower cost, stable energy generation in the future through the later inclusion of increased efficiency technologies.

In general, it is acknowledged that the content of the Draft Plan is largely supportive of facilitating renewable energy developments where appropriate, with relevant policy provisions sufficiently flexible to allow for individual wind energy development proposals to be assessed on their individual merits. Accordingly, IWEA wish to state that they are fully supportive of these policy provisions within the Draft County Development Plan.

5. Conclusion

IWEA welcomes the opportunity to contribute to the Draft Sligo County Development plan and considers that the new County Development Plan should continue to contribute to supporting the sustainable and strategic development of the wind and renewable energy resource in the County.

This new Development Plan is a valuable opportunity for Sligo County Council, by taking a proactive approach, to realise, in an appropriate manner, the renewable 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. We would reiterate our request for the development of a Renewable Energy Strategy for County Sligo.

We thank you for the opportunity to contribute to this important consultation and process, for your time in reviewing this submission and we look forward to continuing to engage with Sligo County Council in the future. We stand available to speak further on the contents of this submission and would welcome the opportunity to comment further as the Development Plan process progresses.

Yours sincerely,

*Sent electronically, bears no signature

Stella Burke
Irish Wind Energy Association (IWEA)