



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

Louth County Council,
County Hall,
Millennium Centre,
Dundalk,
Co. Louth.

By email to: lecp@louthcoco.ie

Date: 25th September, 2015

Re: Louth County Council Socio-Economic Statement prepared as part of the Local Economic and Community Plan (LECP)

Dear Louth County Council,

The Irish Wind Energy Association (IWEA) welcomes the opportunity to comment on the Socio-Economic Statement prepared as part of the Local Economic and Community Plan.

As this Plan will aim to direct the future growth of County Louth over a six year period in order to promote and support the economic development and local and community development, over the medium term and assist in the assessment of growth and development pathways, including the county's renewable energy resource, IWEA very much welcomes the opportunity to comment on the proposed socio-economic statement and remains at the disposal of the Louth County Council should you wish to contact us in relation to any specific aspect of this submission.

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,

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. Wind energy is delivering for Ireland, and already the first eight months of 2015 has seen almost a quarter of our electricity demand met from 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, 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 County Louth County Development Plan 2015 – 2021, currently at draft stage 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 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.

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. 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 County Louth. 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.

The Local Economic and Community Plan and Renewable Energy

The current Louth County Development Plan & Draft Louth County Development Plan 2015 - 2021 on which this LECP rests includes Strategic Objectives, Policies and objectives that offer support to wind energy development, and raises clearly the benefits around both reducing the county's CO² emissions and also attracting direct investment to the county. The LECP must be consistent with these objectives of the core strategy of the CDP.

Of the 11 no. Strategic Objectives listed at section 1.4 of the Draft Louth CDP 2015 – 2021, we note the following:

1. Realise the potential and promote the development and growth of County Louth through harnessing the economic and employment potential of the competitive advantages of the County. This includes for its strategic location, connectivity and accessibility to external markets and having regard in particular to the role of the Dundalk Gateway and Drogheda Primary Development Centre as catalysts for development within the region and to forge strong economic links on a cross border basis with Northern Ireland and adjoining counties in a sustainable manner.

3. Ensure a more sustainable and integrated concept of development with regard to land use, transportation, water services, energy supply and waste management over the lifetime of the Plan.

5. Afford suitable protection to the environment and natural resources of County Louth and ensure the fulfilment of environmental responsibilities.

9. Facilitate the development of infrastructural projects which will underpin sustainable development throughout the county during the period of the Plan.

10. Provide a framework for sustainable development through energy efficiency, increase in the use of renewable energy, minimization of travel demand and increased use of sustainable transport modes

11. Engage in efforts to limit the human induced causes of climate change and take account of climate change in planning and delivering work programs

Renewable Energy Policies set out in the Draft Louth County Development plan state:

RD 23 To support the development of renewable energy resources in rural areas where proposals are consistent with the landscape objectives of the Draft Louth County Development Plan 2015-2021 , the protection of the natural and built environment and the visual and residential amenities of the area and other normal planning requirements.

RD 24 To consider any individual renewable energy proposal on its merits having regard to the Wind Energy Development Guidelines for Planning Authorities, the Department of the Environment, Community & Local Government (DECLG) Circular PL20-13 and any other relevant guidance.

IWEA welcomes the Indicative Actions for the Economic Objective to “**Protect and enhance the natural environment by positioning Louth as Irelands first Smart Green County**” IWEA considers such an objective puts Louth at the forefront of positive actions on the promotion of green smart economy. However IWEA would welcome an additional indicative action in order to achieve this objective to

include “LCC will encourage inward investment in wind energy and renewable energies in Louth, in partnership with the IDA and SEAI.” IWEA consider that this kind of partnership approach could position the county in an excellent position for ensuring the renewable energy capacity of the county is realised.

IWEA welcomes the action “Establish a National Green Data Centre park in Drogheda” under the objective “**Continue to encourage the provision of education and training within the County.**” IWEA suggests that a further indicative action to achieve the objective to encourage education and training and to place County Louth as the Smart Green County would be “LCC will facilitate meeting the needs for growth of renewable energies through training programmes and skills development locally.”

IWEA has, through the Wind Skillnets programme supported and provided range of training opportunities for the wind and renewables sectors in Ireland. Our members can attest to the clear need for training and skills development opportunities in renewable energy. Developing these kinds of skills locally means greater possibilities of local employment in support of local renewable energy projects.

To achieve the economic objective “**To Facilitate infrastructure investment that underpins employment growth**” IWEA suggest that there should be an indicative action within this objective to promote renewable energy developments in order to achieve and encourage economic growth. We put forward that the preparation of a clear economic development strategy for Louth, will provide a positive and clear direction for the county, and especially to achieve a smart green county. This kind of policy coherency supports and installs confidence towards inward investment, the creation of jobs and works as an enabler for clean energy powered Foreign Direct Investment, as shown recently with the €850m investment by Apple in Athenry, Co. Galway with a datacentre to be powered by 100% renewable Irish electricity.

IWEA are clear that further inclusion of indicative actions for renewable energy within the LECP, will enable Louth 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 green smart County;
- Support rural development in a sustainable manner;
- Deliver significant community benefit and,
- Deliver significant commercial rates revenue to County Louth annually.

Conclusion

IWEA welcomes the opportunity to contribute to the Louth, Local Economic and Community Plan at this early stage. We consider that the new Plan should continue as drafted but should include clear indicative actions on renewable energy to help deliver the economic objectives of the County.

This new Local Economic and Community Plan is a valuable opportunity for Louth County Council, by taking a proactive approach, to realise, in an appropriate manner, the 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.