



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

Planning Department,
Carlow County Council,
Athy Road,
Co. Carlow

By email to countydevplan@carlowcoco.ie

27th April, 2014.

IWEA Submission on the Draft Carlow County Development Plan 2015-2021

Dear Sir / Madam

The Irish Wind Energy Association (“IWEA”) is Ireland’s leading renewable energy representative body and as such has an active interest in the wind energy and related policies of the Carlow County Development Plan (CDP).

As this Development Plan will aim to direct the future growth of County Carlow over the medium to long term and assist in the assessment and decision making of planning applications for wind energy developments. This submission follows from and builds upon a previous IWEA submission to the Carlow Plan dated 16th September, 2014.

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.

Yours sincerely,

**sent by email, bears no signature*

Brian Dawson,
Communications Manager,
Irish Wind Energy Association.

IWEA Submission on the Draft Carlow County Development Plan 2015-2021

Introduction

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 produces indigenous renewable electricity while reducing greenhouse gas emissions by displacing traditional fossil fuels.

In recent years Ireland has become heavily dependent on the importation of fossil fuels in order to meet its energy needs. This high dependency on foreign energy imports is unsustainable and Ireland is currently extremely vulnerable both in terms of meeting future electricity needs and ensuring price stability. Accordingly, the Department of Communications, Energy and Natural Resources' (DCENR) energy policy has been moving towards greater levels of self-sufficiency, with renewable energy being a key part of the Government's Energy Policy Framework 2007-2020.

Specific Submission on the Draft Carlow County Development Plan 2015-2021

IWEA welcomes that the Draft Carlow County Development Plan 2015-2021 and Appendix 5: "Wind Energy Strategy", in line with the previous Carlow County Development Plan 2009-2015, is generally supportive of wind energy development and that this support is clearly stated within 'Energy - Policy 5' and section '11.18.2 Wind Development' of the CDP.

We also welcome the additional reference to implement the recommendations of the Methodology for Local Authorities Renewable Energy Strategies (Sustainable Energy Authority of Ireland April 2013) within **Proposed Amendment No. 42**.

DoEHLG Wind Energy Development Guidelines (2006)

In June 2006, the Department of Environment, Heritage and Local Government (DoEHLG) published Wind Energy Development Guidelines for Planning Authorities under Section 28 of the Planning and Development Act, 2000, requiring planning authorities and An Bord Pleanála to have regard to them. The purpose of these guidelines is to provide advice to planning authorities on planning for wind energy through the development plan process and in assessing applications for wind energy development. They also provide clarity to prospective developers and local communities. A number of sections of these guidelines are currently under review.

In the context of the Wind Energy Guidelines, IWEA wishes to comment on **Proposed Amendment No.44, which is an amendment to Section 6.3.1 Wind Energy, Energy – Policy 5**, where it is proposed to delete and insert text as follows:

"It is the Policy of Carlow County Council to:

- Promote and facilitate wind energy development in accordance with ~~Guidelines for Planning Authorities on Wind Energy Development (Department of Environment, Heritage and Local Government, 2006)~~ **best international practices and standards** and subject to compliance with normal planning and environmental criteria and the development management standards."

While warmly welcoming the stated objective to "promote and facilitate wind energy development" in Co. Carlow, we would ask that the proposal to delete the reference to the Guidelines for Planning Authorities on Wind Energy Development (2006) be removed.

It is important to note that although currently under revision, (as noted through Proposed Amendment No. 41) these Guidelines are current, and have been issued under Section 28 of the Planning and Development Act, 2000, which requires both planning authorities and An Bord Pleanála to have regard to them in the performance of their functions. Furthermore as stated within the Guidelines, *“The guidelines are also intended to ensure a consistency of approach throughout the country in the identification of suitable locations for wind energy development and the treatment of planning applications for wind energy developments.”*

IWEA would therefore call for this deletion to be removed and the clear reference to the Guidelines maintained.

Further issues

IWEA would like, having reviewed the current draft, to restate two further issues within the context of the Wind Energy Strategy contained in Appendix 5, which stand to be addressed in line with our previous submission.

Firstly, within Appendix 5 “Wind Energy Strategy”, section 1.6.4 “Noise Issues”, under the section entitled *“Reducing Noise Impacts”* the text states *“the distance between the nearest turbine and a noise sensitive building should be in the region of 500km but will be more finely calibrated by acoustic studies.”* IWEA would ask that this text would be factually corrected to ensure it is in line with the current Wind Farm Planning Guidelines.

Secondly, the noise limit suggested within *Appendix 5 Wind Energy Strategy* at section 1.6.4 does not follow what we would consider to represent ‘best practice’ and the parameter quoted (Leq,15min) is not an appropriate parameter for the measurement of noise from wind turbines. In line with the 2006 Wind Farm Planning Guidelines, IWEA would ask that the measurement should instead reference “LA90, 10min” levels.

Conclusion

In conclusion, it is essential that Carlow County Council continues, through a planned, consistent and sustainable approach, to support the development of the wind energy resources in the county, through the implementation of the CDP and its associated Appendix 5: “Wind Energy Strategy”. This will ensure a future balance of sustainable economic development and employment creation with continued protection of the environment.

IWEA hopes that this submission along with our previous submission will inform the Carlow County Development Plan 2015-2021, and we remain at your disposal if you have any questions on our submission above, or on the current wind energy development position in Ireland.

