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Millennium Park,
Osberstown,
Naas, Co. Kildare

Mr Lar Power,
Director of Economic Development and Planning,
Planning Department,
Menapia Building,
The Mall, Waterford City.

By email to draftrenewableenergy2016@waterfordcouncil.ie

12th July 2016

Re: Waterford City & County Renewable Energy Strategy Consultation

Dear Mr. Power,

The Irish Wind Energy Association (IWEA) welcomes the opportunity to comment on the development of a Renewable Energy Strategy (RES) for Waterford. We welcome the positive and ambitious strategic vision in setting out how Waterford can benefit from contributing to meeting the national targets for the provision of renewable energy in a sustainable manner.

This submission builds upon our previous submission dated 24th March 2016 to the pre-draft consultation. In our response IWEA would like to reiterate that we welcome Waterford County Council's positive support of renewables and wind energy in particular and strongly support the *Vision of the Renewable Energy Strategy* as set out on page 6 of the RES.

IWEA warmly welcomes the clear statement within this draft that renewable energy is vital to Ireland tackling climate change, securing our own energy supply, and cutting our current 85% import dependency which currently costs Ireland €15.6m every single day. Onshore wind energy, as Ireland's most abundant renewable source is also proven to be Ireland's most cost effective renewable energy and is helping to attract major international investment from companies such as Facebook and Apple who need 100% renewable energy to run their facilities.

We thank you for the opportunity to contribute to this important consultation and we look forward to contributing further as the RES progresses.

Yours sincerely,

**sent by email, bears no signature*

Brian Dawson,
Head of Communications,
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 Ireland's most cost effective renewable energy resource.

We are also proud that Irish wind energy is the leading and most cost effective Irish renewable option today for reducing emissions from generation. The excellent value of Ireland's support for wind energy has been acknowledged by the European Commission.

The most recent figures show that Irish wind energy has:

- Delivered over a fifth of Ireland's electricity generation in 2015,
- Lowered our emission from generation to a record low. Without wind energy, Irish emissions from electricity generation would have been 16.2% higher.
- Lowered Irish wholesale electricity prices with wind energy acknowledged as contributing to a 9.4% reduction in 2015.
- Helped cut Ireland's 85% foreign energy dependence, which costs us €5.7bn per annum or €15.6m every single day.

Relevant strategic policy documents, such as the new Waterford Renewable Energy Strategy, must assist in enabling Ireland to develop its natural green energy resources and meet our EU 2020, EU 2030 targets and our legally binding Paris Climate Commitments.

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.

Ensuring Local and National Ambition on Ireland's Climate Action

The Waterford RES rightly positions itself within the context of positive movement towards renewable energy in the international, European, national, regional and local contexts. The European Union in particular 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%", there are hopes that in the wake of the Paris Agreement that the EU may also seek to further raise the ambition level in its renewable energy approach.

We welcome that the firm focus within this RES is kept on the recently published Government Energy White Paper "Ireland's Transition to a Low Carbon Energy Future 2015-2030", which sets out a vision of a low carbon energy system and goals that greenhouse gas (GHG) emissions from the energy sector will be reduced by between 80% and 95%, compared to 1990 levels, by 2050, and will fall to zero or below by 2100.

Wind energy is delivering as part of Ireland's portfolio of renewables and is:

- **Saving us money on imports** - The use of renewables in electricity generation in 2014 avoided €255 million in fossil fuel imports of which €200 million alone was avoided by wind generation.

- **Lowering our emissions** - The use of renewables in electricity generation in 2014 reduced CO2 emissions by 2.6 Mt. The carbon intensity of electricity has fallen by 49% since 1990 to a new low of 457 g CO2 /kWh in 2014. Without wind & renewables, power generation emissions would have been 23% higher last year (2014) in Ireland up from 20.1% in 2013. Without wind energy in 2014, power generation related CO2 emissions would have been 16.2% higher. (This includes accounting for the ramping and cycling of fossil fuel plants.)
- **Creating and providing jobs** - Over 3,400 jobs in Ireland depend on wind energy and that figure is growing every day with over 8,000 jobs expected by 2020.
- **Facilitating investment** – Investment from the wind energy sector alone is expected to see €3.5bn of investment to 2020 and €8.3bn to 2030. Companies like Apple and Facebook are bringing their clean energy powered data facilities here to Ireland. Look at the cluster of pharma companies in Cork or Dundalk IT who actually have their own on-site wind turbines

As the vast majority of new renewable capacity will be provided by on-shore wind, the 40% target to 2020 is a positive challenge. 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 wind and renewable energy will be an extremely positive economic development for the entire Country and, indeed, for Waterford. 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 and renewable energy development will also bring about a reduction of GHG emissions and help tackle global climate change.

Specific Recommendations on the Draft RES

IWEA would like to welcome the clearly stated strategic aim of the RES:

“To ensure that between now and 2030, there is a steady, progressive and measurable increase in the amount of renewable energy used in the electricity, heat and transport sectors in Waterford, commensurate with the achievement of the national target.”

We would propose a number of potential positive additions to the current draft.

(1) Waterford’s Renewable Energy Ambition

As set out within the work done by the Waterford Energy Bureau, Waterford can today boast almost 63MW of onshore wind energy contributing to local and national renewable energy output. Waterford’s renewable energy potential is something which the County and its people can take real pride in developing as part of national, European, and Global efforts towards a low carbon economy and future.

While we welcome the positive projection (set out on page 19 and 20) to seek 131.7MW of onshore wind and 33MW of offshore wind in the county by 2030 and to increase the share of overall renewables, we would feel that considering the wealth of the wind resource in the county that even greater ambition could be achieved. Indeed a clear statement of intent could be made within this RES from the Local Authority to place Waterford as a clean energy leader, combining the local skills and

talents of native companies, local R&D capabilities through Waterford IT, local agencies such as the Waterford Energy Bureau and local people keen to conserve and efficiently use their energy.

With a greater role for wind and other renewables in the county for 2030, we believe that Waterford should state its own ambition for renewable electricity to 2020 in line with national targets and could set itself the longer term and clear ambition to power the county's electricity entirely from renewables rather than the stated ambition of 32.74% by 2030 from the current 10.69% as set out on page 20 of the draft RES. As set out within the RES, the national target for 2020 for renewable electricity is set at 40% and there is a clear role for each County in seeking to achieve this.

We believe that with the right mix of onshore and offshore wind energy and technological advances in other renewable technologies, Waterford could in the longer term generate the projected amount of power necessary to be 100% renewable in its electricity.

The current Waterford County Development Plan (2011-2017) includes policies and objectives that offer support to renewable wind energy development, including Objective ENV5 below. We would call for this previously stated support for the broad range of Indigenous renewables within the CDP to be explicitly reiterated and clearly set out within the RES.

Objective ENV 5 *It is an objective of the Development Plan:*

a) *To encourage, where appropriate, proposals for renewable energy developments and ancillary facilities;*

b) *To promote and facilitate wind energy production in the County in accordance with the County Wind Energy Strategy and the Wind Energy Guidelines (2006) produced by the Department of the Environment, Heritage and Local Government;*

c) *To facilitate, where appropriate, the development of small scale hydroelectric power generation, in particular when developed in combination with other forms of energy infrastructure, such as wind farms; and*

d) *To support and encourage the appropriate development of the bio-energy sector and facilitate its development for energy production, heat storage and distribution*

(2) Supporting New Technologies and Infrastructure

IWEA welcomes the emphasis on ensuring that there is also the necessary infrastructure to support the development of multiple forms of renewable energy in the county. We also support Waterford's ambition to maximise the benefits of renewable energy through smart grid technology.

Smart grids and better use of technology in our power management can empower customers to use their energy in more efficient and cost effective ways. The support for new enabling technologies such as energy storage can also further empower Waterford as a leader in renewable energy.

(3) Ensuring the Economic and Social Benefits of Renewable Energy are Recognised

As well as environmental benefits, there are clear economic and community benefits to the development of renewable energy within Co. Waterford. IWEA considers that there could be an additional focus within the draft RES on the positive economic impacts of such development.

As well as direct investment in renewable energy and its direct benefits, Global companies are today often highlighting their requirement to have their facilities powered 100% by renewable energy, and this can be a deciding point on investment location. Such clean energy investments totalling over €1bn

have been seen recently by Apple in Athenry, Co. Galway and Facebook in Co. Meath powered 100% by Irish renewables.

The inclusion of specific policies and objectives in the RES that promote the further development of renewable energy will enable Waterford County Council to reap economic benefits such as:

- Developing a sustainable, wind and renewable energy industry employing construction and professional service providers and attracting significant capital investment;
- Enhancing the vibrancy and reputation of the county as a renewable energy leader;
- Supporting rural development in a sustainable manner;
- Delivering significant community benefit and,
- Delivering significant commercial rates and development contribution revenue to Waterford annually.

IWEA also welcomes the focus within point 13.3.4 around social economic considerations in planning. We would suggest that within this context of balancing land uses sustainably and properly to ensure sustainable development, there could also be an additional point added focusing on the positive impact which local renewable energy and grid access can have in attracting significant foreign direct investment of the kind mentioned above.

(4) Renewable Energy and the Community

IWEA warmly welcomes the focus within section 13.5 on community consultation. As Ireland's largest renewable energy representative association we welcome and echo the need for both developers and local communities to engage in meaningful consultation from the earliest stages and throughout construction and into operation. IWEA has set out these principles in our own "Good Neighbour - Best Practice Guidelines¹." IWEA also welcomes approaches on community ownership as set out in point 13.5.2.

On section 13.5.3 in relation to Renewable Energy and Community Benefit, IWEA supports the calls made within the Government White Paper as set out to empower Ireland's (and Waterford's) Energy Citizens.

IWEA was the first in 2013, to voluntarily set out a clear guidance to our members in terms of levels of community benefit which should be provided to neighbour communities. We would ask that this "IWEA Good Neighbour" standard be formally recognised within the Waterford RES.

Conclusion

IWEA welcomes the opportunity to contribute to the Waterford Renewable Energy Strategy, we welcome the comprehensive draft and consider that the new strategy must continue to contribute to supporting the sustainable and strategic development of the wind and renewable energy resource in the County.

This is a valuable opportunity for Waterford City and 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.

¹ "Good Neighbour, IWEA Best Practice Principles in Community Engagement & Community Commitment" by the Irish Wind Energy Association, March 2013

IWEA would call for Waterford to take a leadership role in promoting all forms of renewable energy in the county which has a rich potential resource in its land, air and sea.

We thank you for your consideration of this submission and look forward to contributing to this Renewable Energy Strategy as it develops further.