

Mary T. Daly,
Acting Director of Services,
Economic Development, Planning and Infrastructure,
Louth County Council, County Hall,
Millennium Centre,
Dundalk.

By email to contribscheme@louthcoco.ie

3rd August 2016

Re: Draft Louth County Development Contribution Scheme 2016 – 2021

Dear Ms. Daly,

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 Draft Louth County Development Contribution Scheme 2016 – 2021. We also welcome the proposed continued exemption from development contributions provided for generators under 0.5 MW in installed capacity as a positive support to renewable generation.

IWEA has, however, strong concerns regarding the proposed increase in development contributions for renewable energy developments over 0.5 MW in installed capacity. The proposed increased development contribution levels of **€10,000 per MW (€1,000 per 0.1 MW)** of installed capacity marks an unjustified and significant increase from the 2010-2014 Louth Development Contribution Scheme, which saw a payment of **€5,800 per wind turbine**. This payment for commercial wind turbines would represent a dramatic increase for a standard 3MW turbine, which, under the proposed new contribution, would amount to a €30,000 charge per turbine. **This represents an unjustified and wholly excessive increase of over 400% for a standard 3 MW wind turbine.**

IWEA notes that the current Louth County Development Plan (2015-2021), commits under Chapter 9 to support the development of renewable energy, and specifically under Priority EN CO9 commits:

“To encourage the production of energy from renewable resources at suitable locations, subject to normal proper planning considerations, including in particular the impact on areas of environmental

or landscape sensitivity.” IWEA would suggest that this significant Development Contribution rise runs contrary to the existing provisions of Louth’s existing Country Development Plan, as the scale of contribution rises could deter development. **Therefore IWEA would call for this excessive development charge to be brought into line with the previous scheme of €5,800 per turbine.**

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*¹. 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 Authorities²: *“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.”*

In that context, IWEA believe that the scale of increase in **development contributions proposed for wind energy in Louth, typically more than 400% for a standard 3MW turbine, is wholly 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.*

Brian Dawson,
Head of Communications,
Irish Wind Energy Association.

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¹ <http://www.iwea.com/iweabestpracticeprinciplesinco>

² <http://www.environ.ie/en/Publications/DevelopmentandHousing/Planning/FileDownload,32162,en.pdf>