

Irish Wind Energy Association,
Sycamore House,
Millennium Park,
Osberstown,
Naas, Co. Kildare.

Mr. John McCormack,
Director of Services,
Planning Department,
County Hall,
John Street,
Kilkenny

By email to planning@kilkennycoco.ie

8th April 2015

Re: Draft Kilkenny County Council Draft Development Contribution Scheme 2015-2017

Dear Mr. McCormack,

The Irish Wind Energy Association (“IWEA”) is Ireland’s leading 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 renewable energy resource. IWEA members are involved in more than 85% of the wind farm capacity planning to build from now to 2020.

IWEA welcomes the opportunity to respond to the consultation on Co. Kilkenny’s Draft Development Contribution Scheme 2015-2017. We also welcome the proposed continued exemption from development contributions provided for domestic wind turbines.

However IWEA has strong concerns regarding the proposed development contributions that apply to commercial wind turbines. The development contribution levels proposed of **€5,000 per MW** of installed capacity marks a significant increase from the previous Kilkenny Development Contribution Scheme which saw a payment of **€5000 per turbine**.

This payment for commercial turbines would represent a significant increase for a 3MW turbine, which under the proposed rates would amount to a €15,000 charge. This represents an overnight **unjustified and wholly excessive increase of 200% for a 3MW wind turbine. IWEA would call for this excessive development charge to be brought into line with the previous scheme.**

Every new wind farm development provides a substantial contribution to the local and national economy through 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, 2013*¹. More wind on the system will also result in lower and more stable energy prices for consumers while helping us achieve our energy and emissions targets.

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

As outlined in the [DoECLG 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 same guidance²: *“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 Kilkenny is wholly excessive and without recognition of the requirements of the current DoECLG guidance**. This scale of increase, typically 200% for a 3MW turbine is proposed without regard to the existence of benefits from wind energy to the local Kilkenny economy supporting rates, jobs and local investment.

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
Communications Manager,
Irish Wind Energy Association.

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