



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

Mr Paul Kelly,
Planning Department,
Waterford City & County Council,
Menapia Building, The Mall,
Waterford.

By email to planning@waterfordcouncil.ie

8th December 2014

Re: Waterford County Council Draft Development Contribution Scheme 2014-2019

Dear Mr. Kelly,

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. Waterford’s Draft Development Contribution Scheme 2014-2019. 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 €1,000 per .1MW or €10,000 per MW marks a significant and unjustified increase from the previous 2014 Waterford development contribution scheme¹ which indicated a per turbine contribution of €7649.70.

This payment for commercial turbines would represent a significant increase for a standard 2.5MW turbine, which under the proposed rates would amount to a €25,000 charge. This represents an overnight **unjustified and wholly excessive increase of 227% for a standard 2.5MW wind turbine**. Allied to this excessive increase, the proposed development contribution for ‘renewable energy development’ adds a further charge of “€0.50 per metre of transmission line to connect to National Grid”. This represents an entirely new charge on wind farm developers in the county, imposed over and above the already large per MW proposal and further penalises wind energy developments in the County. **IWEA would call for this excessive development charge to be brought into line with the previous scheme and for this transmission fee to be removed.**

¹ <http://www.waterfordcouncil.ie/en/media/RESIDENT/Planning/Publications/Waterford%20County%20DC%20Scheme.pdf>

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*². 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.

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 guidance³: ***“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 is wholly excessive and without recognition of the requirements of the current DoECLG guidance**. This scale of increase, typically 227% for a standard turbine, allied with a transmission fee, is also proposed without regard to the existence of benefits from wind energy to the local Waterford economy supporting rates, jobs and local investment.

IWEA would also like to question the format of the development contribution listing which is extremely unclear, and seems to imply a double charging of renewable energy projects on a ‘per SqM’ basis as well as on a ‘per MW’ basis.

On investigation with Waterford County Council IWEA has been informed that this separation between “Renewable energy installations” and “Renewable Energy Development” is to provide for a differentiation between types of renewable generation. IWEA would oppose this proposed differentiation as it appears to suggest that Waterford Council is inappropriately choosing favoured renewable technologies for lower development contributions through the scheme. **IWEA would in its place propose a clear, easily understood, single renewable energy development contribution rate, in line with previous Waterford Development Contribution Schemes.**

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.*

Caitríona Diviney
Chief Operating Officer
Irish Wind Energy Association

² <http://www.iwea.com/iweabestpracticeprinciplesinco>

³ <http://www.environ.ie/en/Publications/DevelopmentandHousing/Planning/FileDownload,32162,en.pdf>