

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

Ms. Maria Melia,  
Director of Services,  
Planning Department,  
County Hall,  
John Street,  
Kilkenny.

By email to [planning@kilkennycoco.ie](mailto:planning@kilkennycoco.ie)

30<sup>th</sup> May 2016

**Re: Kilkenny Co Co Draft Development Contribution Scheme 2016-2017**

Dear Ms. Melia,

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 Kilkenny County Council’s Draft Development Contribution Scheme 2016-2017. We also welcome the proposed continued exemption from development contributions provided for generators under 0.1 MW in capacity, IWEA has, however, strong concerns regarding the proposed development contributions that apply to renewable energy developments. The development contribution levels proposed of **€10,000 per MW** of installed capacity marks an unjustified and significant increase from the pre 2015 Kilkenny Development Contribution Scheme, which saw a payment of **€5,000 per turbine**.

This latest proposed increase comes directly on the back of a significant increase for wind energy only a year previously. IWEA submitted a response to the Kilkenny County Council Draft Development Contribution Scheme 2015-2017 dated 8<sup>th</sup> April 2015, in which we strongly outlined our concerns regarding the then proposed increase in development contribution rates from **€5,000 per turbine** to **€5,000 per MW**. IWEA remains strongly of the view that an increase of this scale, and this subsequent further huge increase is both unreasonable and damaging to the successful deployment of renewable energy.

This payment for commercial turbines would represent a significant increase for a 3MW turbine which under the proposed rates would amount to a **€30,000** charge. This represents an **unjustified and wholly excessive increase of 500% for a 3MW wind turbine from in less than two years for the exact same turbine. IWEA would call for this excessive development charge to be brought into line with the previous scheme of €5,000 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, 2013*<sup>1</sup>. 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.

IWEA would furthermore ask why the renewable energy sector is the sole sector being targeted for increase within this revised Draft Development Contribution Scheme, and particularly coming on the back of a significant increase, also targeted at wind energy, only a year previously.

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.”*

The benefits to Kilkenny from the development of renewable energy are multiple including payment of local authority rates, employment opportunities, cheaper, clean indigenous energy, reduced national risk of penalties through failing to meet binding renewable electricity targets, national leadership in terms of energy strategy, improved air quality and environmental benefits.

IWEA strongly urges Kilkenny County Council to not increase the development contribution rates to €10,000 per MW, and instead encourage the development of renewable energy projects in the county in order to drive local economy and benefit communities by reinstating the previous level of Development Charge to €5,000 per turbine.

IWEA would also like to draw attention to the following requirement also contained within the Government Development Contribution Guidelines for Planning Authorities<sup>2</sup>: *“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**

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

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

**the current DoECLG guidance.** This scale of increase, typically 500% 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.*

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