



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

Brian Clancy, Administrative Officer,
Planning Section,
Tipperary County Council,
Civic Offices, Nenagh,
Co. Tipperary

By email to planning@tipperarycoco.ie

27th November 2015

Re: Submission to Proposed Variation No. 2 of the South Tipperary County Development Plan 2009

Dear Mr Clancy,

The Irish Wind Energy Association (IWEA) welcomes the Variation No. 2 to both the South Tipperary County Development Plan 2009, which will put in place a strategic planning framework for Tipperary and harmonise planning policies and objectives across the county.

IWEA is Ireland's leading renewable energy representative body and as such has an active interest in the potential for renewable energy, and in particular wind energy, in County Tipperary. As this variation will inform the vision, objectives and policies for the entire county, IWEA would like to make the following comments which we request the planning authority take into consideration in the finalisation and adoption of the variation, including the accompanying Strategic Environmental Assessment (SEA) and Article 6 Habitats Directive Assessment (HDA).

We note that there is no material change proposed to the Wind Energy Strategy of the Development Plans in the proposed Variation and that preparation of a County Renewable Energy Strategy, including review of the Wind Energy Strategies is currently underway and will inform a separate variation process of the County Development Plans in due course.

We would kindly ask that the planning authority make IWEA known of any further consultation periods regarding the making of this variation and notification of the final adopted County Development Plan.

We very much welcome this opportunity and look forward to engaging constructively with you in the future. We would welcome the opportunity to discuss this submission in more detail at any stage.

Yours sincerely,

*Sent by email.

Brian Dawson
Head of Communications,
Irish Wind Energy Association.

Submission to Proposed Variation No. 2 of the South Tipperary County Development Plan 2009

1.0 Introduction

Renewable energy development is a vital part of Ireland's strategy to tackle two major challenges facing us today – ensuring a cost effective secure supply of energy and combating climate change. Wind energy, in particular as an indigenous renewable electricity source, has a key role to play in meeting these challenges. IWEA supports a strategic and transparent approach to proper planning and sustainable development, and recognises that development of wind energy projects must take account of the full range of environmental and community issues.

The promotion of renewable energy, and wind energy in particular, should be a key tenant in shaping this variation to the South Tipperary County Development Plan 2009.

2.0 Core Strategy

In recent years Ireland has become heavily dependent on the importation of fossil fuels in order to meet its energy needs. This high dependency on foreign energy imports, currently standing at 85% is unsustainable and Ireland is currently extremely vulnerable both in terms of meeting future electricity needs and ensuring price stability. Accordingly, the Department of Communications, Energy and Natural Resources' (DCENR) energy policy has been moving towards greater levels of self-sufficiency, with renewable energy being a key part of the *Government's Energy Policy Framework 2007-2020*.

In the Core Strategy, both climate change and energy are identified as core strategic issues of the plan and underpin the development of the policies and objectives for development. It is a core aim of the plan:

"To ensure that the county continues to be a leader in addressing climate change through the facilitation of appropriately located renewable energy developments and through supporting energy efficiency in all sectors of the economy."

IWEA supports this provision of the core strategy and considers its members can assist the planning authority in achieving this aim over the life time of this plan.

3.0 Economic Development

The planning authority acknowledges in *Section 5.0 Economic Development* that the county has a strong rural economy, which is well known for the quality of its agricultural products and food production and more recently has become a leader in renewable energy and energy efficiency.

Every new wind energy project developed by IWEA members provides a substantial contribution to a strong rural economy. Wind energy is a key tenant to sustaining local communities, in particular boosting local and rural economies through sustainable job creation, local authority rates, land rents and increased demand for local support services in construction, operation & maintenance, legal and accounting and project management.

More wind on the system provides for indigenous electricity, and results in more stable energy prices for consumers while helping us achieve our energy and emissions targets. Renewable energy development will make County Tipperary more resilient in future and ensure the core strategic aims of the County Development Plan are achieved.

In previous plans both North and South Tipperary planning authorities have adopted a positive outlook on wind energy development through the identification of wind energy policy areas, comprising maps and policy statements. This has already initiated active wind energy development in the County. Positive, proactive policy statements will secure the current developments and promote the further development of wind energy which will enable the planning authority to:

- Develop a sustainable, wind energy industry employing construction and professional service providers and attracting significant capital investment;
- Enhance the vibrancy of the county as a renewable energy leader;
- Support rural development in a sustainable manner;
- Deliver significant community benefit and,
- Deliver significant commercial rates revenue to County Tipperary annually.

It is noted that no specific provision is given to promote the significant role wind energy plays in the economy of County Tipperary in *Section 5.0 Economic Development*. Given the significant contribution renewable and wind energy developments can make to the local rural economy, IWEA recommends that the planning authority include a specific policy for renewable energy, similar to that afforded to *forestry and minerals, mining and quarrying* industries.

4.0 Climate Change & Energy

At the outset, we all must acknowledge Ireland's need to support renewable energy, which also stems from its EU commitments. These include EU Directive 2009/28/EC on the Promotion of Renewable Energy Sources, which came into force in April 2009 and which establishes a binding target of 20% of overall EU energy consumption coming from renewable sources by 2020. Ireland's target under the Directive is for renewable resources to account for 16% of total energy consumption by 2020. Failure to meet these targets could result in EU sanctions. In line with these commitments, DCENR has a target for electricity from renewable energy sources (RES-E) of 40% by 2020.

The European Union 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%".

As the vast majority of new renewable capacity will be provided by on-shore wind, the 40% electricity target is a significant challenge for the Irish wind industry as a whole. 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 the Irish wind industry will be an extremely positive economic development for the entire country and, indeed, for County Tipperary. 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 energy development will also bring about a reduction of GHG emissions and help tackle global climate change.

As of September 2015, the total capacity in the Republic of Ireland is 2400MW, generated from 199 wind farms. County Tipperary currently has a wind energy capacity of 267.89MW installed over

eighteen windfarms, and there are a number of permitted (but not yet constructed) wind farms in the County and wind farm planning applications pending.

It should be noted that a wider scale expansion of the Irish wind industry will be an extremely positive economic development for Ireland and will result in greater energy security and price stability, job creation, rates and development contributions, lower energy prices and will bring about a reduction of GHG emissions.

IWEA note that there is no material change proposed to the Wind Energy Strategy of the Development Plans in the proposed Variation and that preparation of a County Renewable Energy Strategy, including review of the Wind Energy Strategies is currently underway and will inform a separate variation process of the County Development Plans in due course. IWEA generally supports Objective SO8-1 and SO8-4 and look forward to making a submission on this future strategy in due course:

*SO8-1 It is an objective of the Council, in partnership with the Tipperary Energy Agency, to prepare a county-wide **Renewable Energy Strategy**, to support and facilitate the development of the renewable energy sector of the county.*

*SO8-4 It is an objective of the Council, in partnership with the Tipperary Energy Agency, to prepare **an Energy Action Plan** for Tipperary County Council. The achievement of the objectives and targets of the Energy Action Plan will be monitored as an indicator of climate change adaption*

However, it also asked that the planning authority expand this provision to ensure the strategy is prepared in partnership with as wide a group of public and private stakeholders as possible including representatives from the renewable energy and including IWEA. IWEA also asks that as many stakeholders as possible be included in Objective SO8-4 in which the council intends to prepare an Energy Action Plan for Tipperary County Council.

One insertion which IWEA asks the planning authority to consider is in relation to Section 8.4.2 and the provision of electricity network infrastructure. It is asked that the council support and facilitate the sustainable development of additional electricity generation capacity throughout the county and to support the sustainable development of the network. National grid expansion is important in terms of ensuring adequacy of regional connectivity as well as facilitating the development and connectivity of sustainable renewable energy resources. To this end, IWEA suggests the following insertion into Policy CEF4 Wind Energy Policy:

*It is the policy of the Council to facilitate wind energy developments **[and associated electricity network infrastructure]** where it is demonstrated to the satisfaction of the Council that they comply with the Wind Energy Development Guidelines, DEHLG, 2006 (and any review thereof) and the Wind Energy Strategy set out in Appendix 6 and any review thereof.*

An additional new policy should then be incorporated, stating:

It is the policy of the Council to facilitate the sustainable development of additional electricity generation capacity throughout the region/county and to support the sustainable expansion of the network. National grid expansion is important in terms of ensuring adequacy of regional connectivity for sustainable economic growth as well as facilitating the development and connectivity of sustainable renewable energy resources.

5.0 Appendix 6 Wind Energy Developments

IWEA note that there is no material change proposed to the Wind Energy Strategy of the Development Plans in the proposed Variation and that preparation of a County Renewable Energy Strategy, including review of the Wind Energy Strategies is currently underway and will inform a separate variation process of the County Development Plans in due course.

Therefore, no specific comment is made in this submission on the material issues contained in the strategy. IWEA, however, would kindly ask the planning authority to publish on its website better quality, un-pixelated maps for reference and use by members and the public.

Generally in reviewing the variation, IWEA would also consider that reference should be made to the Sustainable Energy Authority of Ireland (2012) publication *A Methodology for Local Authority Renewable Energy Strategies* for any updates to the County Development Plan

6.0 Conclusion

IWEA welcomes the opportunity to contribute to this important variation to the Development Plan for the amalgamated County Tipperary and considers that the new strategy should continue as drafted to contribute to supporting the sustainable and strategic development of the wind and renewable energy resource in the County.

This new amalgamated Development Plan is a valuable opportunity for Tipperary County Council, by taking a proactive approach, to further realise, in an appropriate manner, the renewable energy development potential of the County and to adopt policies and objectives that enhance sustainable development.

The importance of adopting clear policies and a detailed strategy using a logical methodology and with the benefit of the statutory process is immeasurable. This approach brings a greater degree of clarity for those proposing projects, local communities as well as for the planning authority.

IWEA considers that the planning authority has so far adopted a positive outlook on wind energy development in the county. IWEA is therefore hopeful that this will continue in the varied plan, to ensure it will contribute to achieving the development of the wind resource in County Tipperary.