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Administrative Officer,
Planning Department,
Menapia Building,
The Mall, Waterford City.

By email to renewableenergy@waterfordcouncil.ie

24th March 2016

Re: Waterford City & County Renewable Energy Strategy Pre-draft Public Consultation

Dear Waterford Forward Planning team,

The Irish Wind Energy Association (IWEA) welcomes the opportunity to comment on the pre-draft phase of the development of a Renewable Energy Strategy (RES) for Waterford. We welcome the positive strategic vision in setting out how Waterford can benefit from contributing to meeting the national targets for the provision of renewable energy in a sustainable manner.

This is the pre-draft stage and will help to inform the vision, objectives and policies of the new Waterford Renewable Energy Strategy during a crucial period, as Ireland works to meet our EU2020 commitments, and as we look forward to our EU 2030 commitments and our COP21 climate obligations. Therefore, we feel it is critically important to make our submission at this stage and we look forward to engaging constructively with the Council in the future.

IWEA would like to reiterate that we welcome Waterford County Council's positive support of renewables and wind energy in particular. Renewable energy development is a vital part of Ireland's strategy to tackle two major challenges facing us today – ensuring a secure supply of energy and combating climate change.

We thank you for the opportunity to contribute at this first stage consultation and we look forward to contributing further as the RES progresses.

Yours sincerely,

**sent by email, bears no signature*

Brian Dawson,
Communications Manager,
Irish Wind Energy Association.

Introduction

The Irish Wind Energy Association (IWEA) is Ireland's leading renewable energy representative body and, as such, it 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. IWEA also promotes awareness and understanding of wind power as Ireland's most cost effective renewable energy resource. Wind energy is delivering for Ireland, and in 2015 saw 24% of our electricity demand met from indigenous wind energy.

Renewable energy development is a vital part of Ireland's strategy to tackle some of the major challenges facing us today – including ensuring a secure supply of energy and combating climate change. Wind energy, in particular, has a key role to play in meeting these challenges. IWEA supports a strategic and transparent approach to proper renewable energy planning and sustainable development.

Wind energy is the leading source of Irish renewables and the most cost competitive for Ireland, so we believe Irish wind energy can help lead our transition to a cleaner power supply and to reduce our dependency on foreign energy imports

Ireland is providing climate leadership globally, especially in the field of renewable energy, and but we must ensure that this leadership is translated into tangible deliverables in the context of sustainable development, Ireland's own energy plan, and our national commitments from December's Paris Global Climate agreement.

Relevant strategic policy documents, such as the new Renewable Energy Strategy, must assist in enabling Ireland to develop its natural green energy resources and meet our EU2020 and developing 2030 targets. IWEA members are involved in developing more than 85% of the wind farm capacity that is planned to be built from now to 2020 and we continue to contribute proactively and positively to the development of local, regional and national strategic planning.

EU Commitments and DCENR's RES-E target

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, as well as a binding 10% minimum target for energy from renewable resources in the share of transportation fuels. 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 announced a revised 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%".

We would also ask that a firm focus with the RES is kept on the recently published Government Energy White Paper "*Ireland's Transition to a Low Carbon Energy Future 2015-2030*", which sets out a vision

of a low carbon energy system and goals that greenhouse gas (GHG) emissions from the energy sector will be reduced by between 80% and 95%, compared to 1990 levels, by 2050, and will fall to zero or below by 2100.

We welcome the reference within the issues paper to Ireland's unsustainable 85% energy import dependency. Ireland ranks as the 4th most energy dependent EU Member State behind only Cyprus, Malta and Luxembourg and this dependency, according to SEAI figures costs Ireland €5.7bn per annum, or €15.6m every single day. That's money leaving this country while we have the Power to Power Ourselves with our indigenous renewables to a much greater extent than we are today. Already today in Waterford there is approximately 60MW of wind energy capacity contributing to Ireland's indigenous electricity.

Wind energy is delivering as part of Ireland's portfolio of renewables and is:

- **Saving us money on imports** - The use of renewables in electricity generation in 2014 avoided €255 million in fossil fuel imports of which €200 million alone was avoided by wind generation.
- **Lowering our emissions** - The use of renewables in electricity generation in 2014 reduced CO2 emissions by 2.6 Mt. The carbon intensity of electricity has fallen by 49% since 1990 to a new low of 457 g CO2 /kWh in 2014. Without wind & renewables, power generation emissions would have been 23% higher last year (2014) in Ireland up from 20.1% in 2013. Without wind energy in 2014, power generation related CO2 emissions would have been 16.2% higher. (This includes accounting for the ramping and cycling of fossil fuel plants.)
- **Creating and providing jobs** - Over 3,400 jobs in Ireland depend on wind energy and that figure is growing every day.
- **Facilitating investment** – Investment from the wind energy sector alone is expected to see €3.5bn of investment to 2020 and €8.3bn to 2030. Companies like Apple and Facebook are bringing their clean energy powered data facilities here to Ireland. Look at the cluster of pharma companies in Cork or Dundalk IT who actually have their own on-site wind turbines

As the vast majority of new renewable capacity will be provided by on-shore wind, the 40% target to 2020 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 Waterford. 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 and renewable energy development will also bring about a reduction of GHG emissions and help tackle global climate change.

Renewable Energy Policy Context

The current Waterford County Development Plan (2011-2017) includes policies and objectives that offer support to renewable wind energy development, including Objective ENV5 below. We would call for this previously stated support for the broad range of Indigenous renewables to be reiterated and clearly set out within the future RES.

Objective ENV 5 *It is an objective of the Development Plan: a) To encourage, where appropriate, proposals for renewable energy developments and ancillary facilities; b) To promote and facilitate wind energy production in the County in accordance with the County Wind Energy Strategy and the*

Wind Energy Guidelines (2004) produced by the Department of the Environment, Heritage and Local Government; c) To facilitate, where appropriate, the development of small scale hydroelectric power generation, in particular when developed in combination with other forms of energy infrastructure, such as wind farms; and d) To support and encourage the appropriate development of the bio-energy sector and facilitate its development for energy production, heat storage and distribution

The preparation of a Renewable Energy Strategy is seen as key to the delivery of wind and renewable energy developments at appropriate locations. IWEA welcomes the preparation of such a Strategy within Waterford.

IWEA would propose that this strategy should adopt an opportunities and constraints based approach to ensure that the wind and renewable energy potential of the County is maximised, whilst ensuring a clear strategic and environmentally sensitive approach. IWEA suggests that, as well as providing the geographical context for wind and renewable energy policy in the County, the strategy should also include clear minimum targets for renewable energy production as has been adopted in other western counties such as Galway, based on an over-arching objective to maximise the renewable energy potential of the County. IWEA would also strongly suggest that this plan would be developed in accordance with the Methodology for Local Authority Renewable Energy Strategies (LARES)¹ as developed by the Sustainable Energy Authority of Ireland (SEAI) at the request of Local Authorities would be utilised.

The preparation of a clear strategy, targets and identification of geographical areas where wind energy development is encouraged or permissible is necessary to ensure clarity for all parties. This provides a greater degree of certainty for the wind industry and, indeed, for local residents and other local groups. It also provides clarity for the Planning Authority (and An Bord Pleanála) to facilitate the proper and consistent assessment of such development proposals. Many other Councils have prepared renewable/wind energy strategies and these provide essential and clear direction for the industry, in its widest sense.

Again, we would welcome the Council's commitment to prepare this Renewable Energy Strategy and we suggest that the methodology is similar to that recently used by other Councils, such as Mayo, Galway and Clare. These Councils have prepared detailed strategies using a clear and logical approach and these now form part of the relevant County Development Plans. The strategies are invaluable for all concerned in the wind energy sector and the wider public and they achieve an appropriate balance between harnessing the natural resource, and safeguarding the local environment.

The inclusion of specific policies and objectives in the RES that promote the further development of renewable energy will enable Waterford County Council to:

- Develop a sustainable, wind and renewable 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 Waterford annually.

IWEA recommends that the new Renewable Energy Strategy take all due cognisance of EU and national energy policy and targets. In addition, the Strategy should be prepared in accordance with the SEAI document entitled "A Methodology for Local Authority Renewable Energy Strategies".

¹ http://www.seai.ie/Publications/Renewables_Publications_/Wind_Power/Methodology-for-Local-Authority-Renewable-Energy-Strategies.pdf

Conclusion

IWEA welcomes the opportunity to contribute to the Waterford Renewable Energy Strategy at this early stage, and considers that the new strategy must continue to contribute to supporting the sustainable and strategic development of the wind and renewable energy resource in the County.

This is a valuable opportunity for Waterford City and County Council, by taking a proactive approach, to 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.

We thank you for your consideration of this submission and look forward to contributing to this Renewable Energy Strategy as it develops further.