



Irish Wind Energy Association,
Sycamore House,
Millennium Park,
Osberstown,
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County Development Plan Review,
Planning Department,
Wicklow County Council,
Station Road,
Wicklow Town.

By email to planreview@wicklowcoco.ie

18th February 2016

Re: Submission to the Draft Wicklow County Development Plan 2016-2022.

Dear Wicklow Forward Planning Team,

The Irish Wind Energy Association (IWEA) welcomes the development of the Draft Wicklow County Development Plan 2016-2022 as a strategic planning framework for Co. Wicklow. This submission follows on from our previous submission to the Issues Paper dated 23rd December 2014.

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 Wicklow. 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 Development Plan.

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.

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 the primary renewable energy resource.

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. Wind energy produces indigenous renewable electricity while reducing greenhouse gas emissions by displacing traditional fossil fuels.

IWEA clearly supports proper planning and sustainable development and recognises that wind energy projects must be properly and sustainably sited in accordance with the clear environmental and other requirements of the planning system.

Relevant policy documents, such as the new County Development Plan, must assist in enabling Ireland to develop its natural green energy resources and meet our EU 2020 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, naturally, have a keen interest in policy formulation.

In summary, this submission is being made to:

1. Support the policies and objectives contained within the Draft Wicklow County Development Plan, 2016 which encourage and assist the continued provision and development of renewable energy and specifically wind energy development within the County, and
2. To request that certain elements of Objective CCE6 be re-worded to ensure compliance with National Guidelines and to ensure that the optimum sites for wind farm developments can be selected and supported through the planning process.

EU Commitments

IWEA welcomes progress being made at local at national level towards meeting our EU commitments under EU Directive 2009/28/EC on the Promotion of Renewable Energy Sources, 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. In line with these commitments, our national target for electricity from renewable energy sources (RES-E) is 40% by 2020 and we are currently approximately half way towards reaching that binding objective.

The European Union is also now in the process of agreeing a further series of targets for renewable energy towards 2030, and Ireland in October 2014 agreed to new 2030 targets which seek a 40% reduction in Green House Gas Emissions and a binding EU target for renewable energy of "at least 27%".

Positive progress is being made towards our targets and especially in the renewable electricity (RES-E) area, where for 2014 18.3% of Ireland's electricity came directly from indigenous wind energy, and provisional EirGrid information for 2015, shows that 24% of our total Irish electricity demand has been met from Irish wind energy alone.

Ireland is today the fourth most energy dependent EU Member State importing 85% of our energy needs at a cost to our Irish economy of €15.6m every day. Irish wind energy is cutting the need for the use of imported, expensive and emissions heavy fossil fuels, however much work in developing our renewable energy potential is yet to be done.

Ireland's Transition to a Low Carbon Energy Future 2015-2030

The Government White Paper entitled '*Ireland's Transition to a Low Carbon Energy Future 2015-2030*' has recently been published by the Department of Communications, Energy and Natural Resources (DCENR). This Paper provides a complete energy update and a framework to guide policy up to 2030. The Paper builds upon the White Paper published in 2007 and takes into account the changes that have taken place in the energy sector since 2007.

The White Paper states the advances in Ireland's energy efficiency and renewable energy and generation use between 2007 and 2015. Renewable energy sources (which include wind) accounted for nearly 23% of Ireland's electricity consumption in 2014, which is just over halfway to Ireland's 2020 target of 40%. The policy framework sets out a vision for a low carbon future that maintains Ireland's competitiveness and ensures a supply of affordable energy. The paper advises that a range of policy measures will be employed to achieve this vision and will involve amongst many things, generating electricity from renewable sources of which there are plentiful indigenous supplies and increasing the use of electricity and bio energy to heat homes and fuel transport.

The White Paper states that onshore wind continues to be the main contributor of energy (18.2% of total generation and 81% RES-E in 2014) and that a significant amount of additional onshore renewable generation capacity is likely to be required to achieve the 2020 target of 40% RES-E. To achieve this target the White Paper states that the average rate of build of onshore wind generation will need to increase up to 260 MW per year from the current rate of build which is stated by the White Paper at about 170 MW per year.

Renewable Energy Challenges

In the context of the 2020 deadlines and having regard to the available proven and most cost effective technology, the vast majority of new renewable energy generation in Ireland will be provided by on-shore wind, the 40% 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 Wicklow County. It will result in greater job creation, as well as increased local authority income through commercial rates and development contributions. Furthermore, the availability of renewable energy as a power source is increasingly becoming a significant deciding factor in site selection for Foreign Direct Investment (FDI) projects as has been seen for recent renewables power data centre investments by Apple in Co. Galway and Facebook in

Co. Meath. At the same time, new wind energy development will also bring about a reduction of GHG emissions and help tackle global climate change.

Draft Wicklow County Development Plan 2016-2022

IWEA welcomes the opportunity to comment on the Draft Wicklow County Development Plan 2016-2022, and acknowledges that the County Wicklow Wind Energy Strategy forms part of the Draft Plan. IWEA appreciates the recognition the Draft Development Plan affords to the significant increase in Ireland's energy requirements over the past two decades and the key role renewable energy will play in meeting increasing energy demand as well as addressing commitments to national and European energy policy targets. The Draft County Development Plan also recognises the substantive wind resource available to the Country, within the European context, with approximately 6% of EU wind resources (even though Ireland only accounts for 2% of the European landmass). IWEA welcomes in this regard Objective EMP 17 which states that is it an Objective of the Council *"to encourage and facilitate the development of "green" industries, including industries relating to renewable energy and energy-efficient technologies, waste recycling and conservation"*.

The Draft Plan goes on in Section 9.5 to acknowledge the renewable energy commitments that have been undertaken at a national and European level. In relation to Electricity generation the Draft Plan states *"It is therefore imperative that further progress is made in this area and that alternative renewable sources are further expanded and developed."*

The County Wicklow Wind Energy Strategy has identified areas that are *"Most Favoured"*, *"Less Favoured"* and *"Not Favoured"*, for wind energy development within the County, and is included as Appendix 6 of the current draft plan. The Draft plan states that *"it is the policy of the Council to maximise wind energy development within the County in all three of these areas, on a case by case basis, subject to meeting specific requirements and guidance contained within the strategy."*

IWEA wishes to state that we are fully supportive of the above objectives and provisions within the Draft County Development Plan.

Serious Concerns within Objective CCE6

Notwithstanding the above, and despite the need for progressive and sustainable measures to combat climate change effects whilst providing for future energy requirements, the Wind Energy Objectives contained within the Draft Plan do not adequately address these needs.

Specifically, **one element within Wind Energy Objective CCE6 is seen by IWEA as a significantly negative step, which appears at odds with other provisions within the Draft Plan itself as well as national policy** and steps away from national and international sentiment in moving towards more sustainable energy generation.

In its current draft, Objective CCE6 seeks:

"To encourage the development of wind energy in accordance with the County Wicklow Wind Strategy and in particular to allow wind energy exploitation in most locations in the County subject to:

- *Consideration of any designated nature conservation areas (SACs, HNAs, SPAs, SAAOs etc.) and any associated buffers;*
- *Impacts on Wicklow's landscape designations;*
- *Impacts on visual, residential and recreational amenity;*
- *Impacts on 'material assets' such as towns, infrastructure and heritage sites;*
- *Consideration of land cover and land uses on or adjacent to the site;*
- *Best practice in the design and siting of wind turbines, and all ancillary works including access roads and overhead cables; and*
- ***Wind farms shall be at least 1,000m from any residential dwellings".***

While IWEA acknowledges the importance of selecting the optimum locations for wind farm developments and ensuring that projects follow the requirements of proper planning and sustainable development, the last point stated within CCE6 (i.e. the imposition of the requirement for wind farms to be "at least 1,000m from any residential dwellings") runs directly contrary to the current Wind Energy Development Guidelines and places unnecessary restriction and constraint on the site selection process which would jeopardise renewable energy investment and development in the County.

IWEA would like to clearly state that the setting of such a separation distance under this variation, would cut across and undermine the Government policy to deliver more indigenous renewable energy and reduce our current 85% imported fossil fuel dependency. Ruling out what could be suitable sites on an arbitrary basis could hinder our ability to meet our ambitious, but necessary and legally binding EU renewable energy and EU climate change commitments.

The Draft Plan does not provide any justification for the imposition of this one kilometre separation distance, nor is one contained in the County Wicklow Wind Energy Strategy. The separation distance quoted is an arbitrary distance and no explanation has been provided for this deviation from current planning guidance.

In this regard, we refer to the Department of the Environment, Communities and Local Government Wind Energy Development Guidelines 2006, which contain the following statements in relation to setbacks and buffer distance requirements for wind turbines (in the context of noise and shadow flicker):

- *"In general, noise is unlikely to be a significant problem where the distance from the nearest turbine to any noise sensitive property is more than 500 metres", (Section 5.6, page 30 of the Guidelines refer);*
- *"It is recommended that shadow flicker at neighbouring offices and dwellings within 500m should not exceed 30 hours per year or 30 minutes per day" (Section 5.12, Page 33 of the Guidelines refer);*
- *"Where the calculations indicate that occupied dwelling houses would be significantly affected, a condition requiring the non-operation of turbines at times when predicted shadow flicker might adversely impact on any inhabited dwelling within 500m of a turbine may be appropriate." (Section 7.14, Page 85 of the Guidelines refer);*

In proposing this "at least 1000m" separation Wicklow County Council is in fact blatantly disregarding the Department of Environment Guidelines, and directly contracting its own *Wicklow Wind Energy Strategy* which clearly refers to the authority of the current Guidelines on page 3:

"The 2006 Wind Energy Guidelines (DoEHLG) for Ireland offer advice to planning authorities on planning for wind energy through the development plan process and in determining applications for

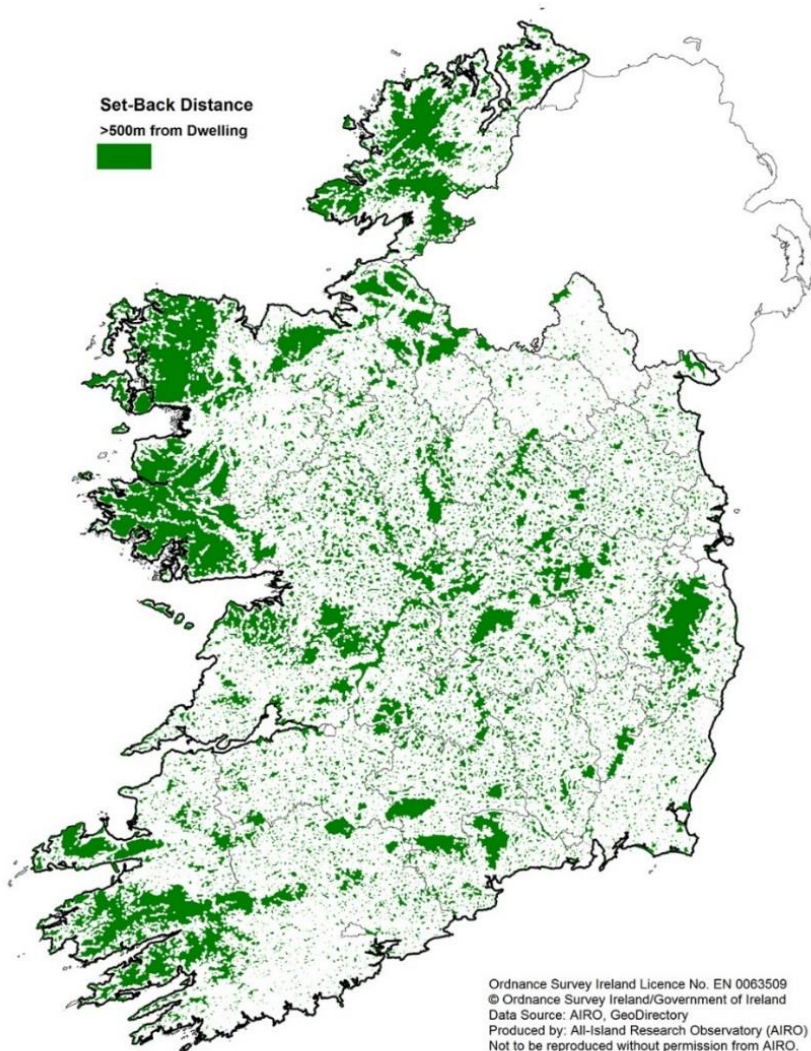
planning permission. While an update to these guidelines is anticipated, the 2006 guidance currently forms the sole guide for planning for wind energy development in Ireland.”

Furthermore, **The All-Island Research Observatory (AIRO)** who are an independent spatial research body has mapped that for a 500m setback, just under a quarter (23.75%) of the total land area of the country would remain available for new wind farm development.

However, this significantly drops to:
9.4% for a 1,000m setback,

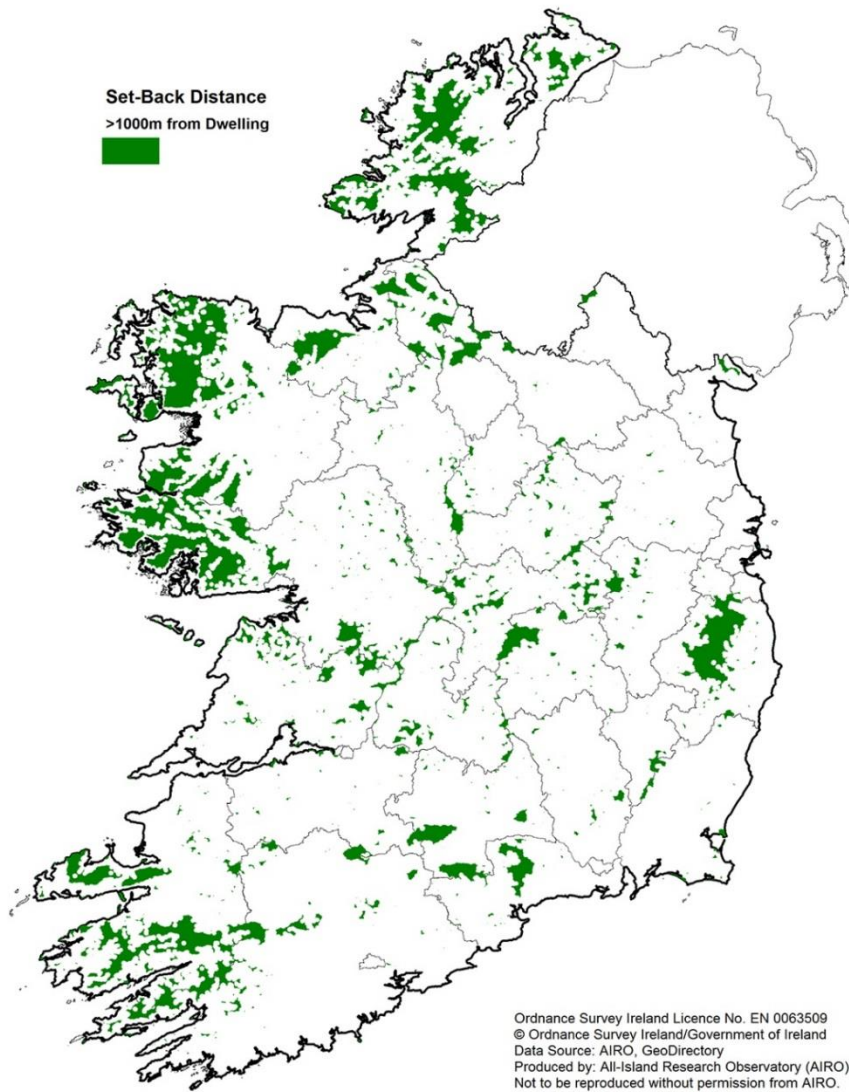
(i) Impact of a 500M Housing Buffer Zone in ROI

In the case of the **500m setback**, **23.75%** of the total land area of the country would remain available for new wind farm development.



(ii) **Impact of a 1KM Housing Buffer Zone in ROI**

In the case of the **1000m setback**, only **9.4%** of the total land area of the country would remain available for new wind farm development.



Source: [Analysis carried out by AIRO at NUI Maynooth](#)

It is also important to note that while the analysis above from AIRO at NUI Maynooth is robust, it does not take into account, other constraints such as:

- Availability of a viable Wind resource
- Avoidance of known archaeological features with an appropriate buffer if required
- An airport buffer
- A radar buffer
- A telecommunications buffer

- Landscape constraints for sensitive landscape
- County Development Plan zoning

Therefore the total land area remaining available under the above scenario remains an optimistic number as the % land area would in fact be significantly smaller, if not towards zero for distances >500m, when all other constraints are taken into account.

This analysis clearly indicates that a setback distance of 1km as proposed in Wicklow would mean that there would *be virtually no land available within the county for wind development and demonstrates that applying such a restriction is uninformed given no quantitative study has been prepared.*

There is no doubt **such a policy will rule out the development of Wind Energy Development within the County even in the areas considered otherwise suitable.**

IWEA are concerned that the inclusion of an “*at least 1,000 metre*” standard set back of wind farm developments from dwellings will:

- Greatly reduce the suitable site alternatives available for wind farm development within County Wicklow, as identified within the wind Energy Strategy that has been adopted;
- Reduce the ability of landowners to bring forward renewable energy projects on their own lands;
- Apply an inappropriate strategic level constraint that would not be necessary to ensure the protection of residential amenity at individual project level;
- Restrict the opportunities for Wicklow to benefit from development of its own Green Economy with benefits from jobs, investment, carbon emissions savings and for the reputation of the country. We note that within Chapter 5 on Economic Development, Green Energy is clearly identified as an opportunity for economic development within objective EMP17, including renewable energy.
- Reduce the ability of Wicklow as a County and the Country as a whole to support the delivery and achievement of renewable energy targets that have been set and are subject to national and international agreement;
- Restrict the ability of the planning Authority to favourably consider wind farm projects that fully satisfy all the other listed requirements following detailed individual project assessment and study; and
- Render the Wicklow Development Plan inconsistent with Ministerial Guidelines that have been issued under Section 28 of the Planning and Development Act, 2000 as amended.

IWEA reiterate our serious concern that the result of the proposed amendments would be the further overall reduction in wind farm capacity areas within County Wicklow.

The imposition of a rigid extreme separation distance of 1km within the strategic planning policy for the County will further restrict, to the point of extinction, any potential for future wind energy development in Co. Wicklow. **IWEA would like to ask the Council if this is the intended consequence of such proposals.**

Conclusion

IWEA is hopeful that the new County Development Plan will contribute to achieving the continued development of the wind resource in the County. This is a valuable opportunity for Wicklow County Council, by taking a proactive approach, to realise, in an appropriate manner, the wind 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 the wind energy industry, as well as for the planning authority and the general public.

Given the development plan's remit in relation to wind energy development (i.e. that it provides a broad strategic land use framework), it is suggested that development plan objectives should not stipulate site specific design constraints. Appropriate design constraints such as set-back distances are informed by national policy guidance and further informed by the detailed project design process undertaken in tandem with the preparation of an Environmental Impact Statement for a project.

The inclusion of a mandatory 1,000 metre set back distance within a policy objective will unnecessarily and inappropriately restrict the implementation of national and local policy to generate additional electricity from renewable sources and artificially restrict the number and range of sites that could be brought forward that would otherwise satisfy all the other requirements of the County Development Plan, National Guidelines and the requirements of proper planning and sustainable development.

Climate change is a global issue and is a matter for all levels of government to address from an international to a local level. The inclusion of a mandatory 1,000 metre set back will unnecessarily prevent the full potential of County Wicklow's renewable energy and wind energy resources being harnessed, and would be misaligned with the other policies and provisions within the Draft Plan that support the development of renewables.

To conclude, therefore, while IWEA fully supports the provisions contained within the plan which seek to increase and foster further renewable energy development within the County, it requests that the requirement for an "at least 1,000 metre" set back from residential development be omitted from the final plan. Omitting this provision will ensure compliance with National Guidance while also allowing wind farm developments to be assessed on a more detailed case by case basis. Reviewing wind farm applications on a specific project by project basis will allow all relevant potential impacts to be assessed during the planning application process and will ensure that an appropriate balance can be struck between reaching national and international renewable targets and the protection of residential amenities.