



Irish Wind Energy Association,
Sycamore House,
Millennium Park,
Osberstown,
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The Central Planning Unit,
Donegal County Council,
County House,
Lifford,
Co. Donegal.

By email to donegalcdp@donegalcoco.ie

3rd August 2016

Re: Submission to the Review of *Donegal County Development Plan 2012-2018 (as varied)*

Dear Sir/Madam,

The Irish Wind Energy Association (IWEA) welcomes the commencement of a review of the existing *County Donegal Development Plan 2012- 2018 (as varied)*.

IWEA is Ireland's leading renewable energy representative body and has an active interest in renewable energy, and in particular wind energy. We note specifically *Issue Paper No. 5* in relation to Renewable Energy. As the next plan will inform the vision, objectives and policies for the county to 2024, 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 *Donegal County Development Plan 2018-2024*. 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,

*Submission made electronically.

Brian Dawson,
Head of Communications,
Irish Wind Energy Association.

1.0 Introduction

The Irish Wind Energy Association (IWEA) is Ireland's leading renewable energy representative body and has an active interest in the potential for sustainable energy. IWEA is committed to promoting the use of wind energy in Ireland, as an economically viable and environmentally sound alternative energy source. IWEA also promotes awareness and understanding of wind power as a primary renewable energy resource.

We are proud that Irish wind energy is the leading and most cost effective Irish renewable option today for reducing emissions from generation. The excellent value of Ireland's support for wind energy has been acknowledged by the European Commission.

The most recent published figures show that Irish wind energy has:

- Delivered over a fifth of Ireland's electricity generation in 2015,
- Lowered our emission from generation to a record low. Without wind energy, Irish emissions from electricity generation would have been 16.2% higher.
- Lowered Irish wholesale electricity prices, with wind energy acknowledged as contributing to a 9.4% reduction in 2015.
- Helped cut Ireland's 85% foreign energy dependence, which costs us €5.7bn per annum or €15.6m every single day.

Relevant strategic policy documents, such as the new Donegal County Development Plan post 2018, must assist in enabling Ireland to develop its natural green energy resources and meet our EU2020, EU 2030 targets and our legally binding Paris Climate Commitments.

IWEA strongly supports proper planning and sustainable development, and recognises that wind energy projects must be appropriately and sustainably sited in accordance with environmental and planning policy and other legislative requirements of the planning system.

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 have a keen interest in policy formulation. In summary, this submission is being made to:

1. Support the existing policies and objectives contained within the *Donegal County Development Plan 2012-2018* 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 policies and objectives be strengthened to ensure compliance with the national guidance on wind energy, and any subsequent successor guidance.

2.0 Existing Policies and Objectives of the County Development Plan

IWEA continue to support the existing policies and objectives contained within the *Donegal County Development Plan 2012-2018* which encourage and assist the continued provision and development of renewable energy and specifically wind energy development within the county.

These existing policies and objectives have ensured progress being made at local and national level towards meeting our EU commitments under *EU Directive 2009/28/EC on the Promotion of Renewable Energy Sources*. This *Directive* 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 greenhouse gas emissions and a binding EU target for renewable energy of 'at least 27%'.

There is positive progress being made towards our targets, particularly in the renewable electricity sector, where, in 2015 over 20% of Ireland's electricity came directly from indigenous wind energy. The provisional EirGrid information for 2016, shows that for the first half of the year, 22% of our total Irish electricity demand has been met from Irish wind energy alone.

The Irish State imports 85% of our energy needs at a cost of €15.6m every day to the Irish economy. 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. It is, therefore, crucial that Donegal County Council carry forward its positive vision for renewable energy and the objective and polices for wind development into the *Donegal County Development Plan 2018-2024*.

IWEA note that the Landscape Character Assessment for County Donegal remains at draft stage. We would request to be given an opportunity to consult once the Assessment is complete and in particular on any elaboration on the *Forces for Change* described in each LCA.

2.1 The White Paper on Energy Policy in Ireland (2015)

Donegal County Council has widespread policy support to carry forward its positive vision for renewable energy.

In 2015 the *White Paper on Energy Policy in Ireland: Ireland's Transition to a Low Carbon Energy Future 2015-2030* was published by the Government. This complete energy policy update, sets out a framework to guide policy between now and 2030. Its objective is to guide a transition to a low carbon

energy system, which provides secure supplies of competitive and affordable energy to our citizens and businesses.

The White Paper seeks the radical transformation of Ireland's energy system, required to meet climate policy objectives. Our vision of a low carbon energy system means that greenhouse gas (GHG) emissions from the energy sector will be reduced by between 80% and 95%, compared to 1990 levels, by 2050.

To achieve a low carbon future, the White Paper clearly identifies a need to generate our electricity from indigenous renewable sources of which we have a plentiful Irish supply, and to move to lower emissions fuels (e.g. moving from peat and coal to gas), and ultimately away from fossil fuels altogether.

It is made clear throughout the document that onshore wind will continue to make a significant contribution to achieving this. It is a proven technology and Ireland's abundant wind resource means that a wind generator in Ireland generates more electricity than similar installations in other countries. This results in a significantly lower cost of support.

The White Paper states that onshore wind continues to be the main contributor of Ireland's renewable energy (18.2% of total generation and 81% RES-E in 2014). EirGrid's Generation Capacity Statement (2016-2025) projects that a total of between 3,800- 4,100MW of onshore renewable generation capacity is likely to be required to achieve the 2020 target of 40% RES-E. To achieve this target the Energy White Paper states that the average rate of build of onshore wind generation will need to increase.

The White Paper brings significant focus on community participation in the transition to a low carbon future and development of renewable energy projects From Passive Consumer to Active Citizen. A range of opportunities for community participation are listed.

Donegal County Council need to factor these predictions into its spatial plan when preparing a *Wind Energy Strategy* for the County and providing for an enhanced transmission network. *Issue Paper No. 5 - Renewable Energy*, prepared by Donegal County Council, recognises the importance of these issues and IWEA now asks that the existing visions and commitments are carried forward in the new County Development Plan.

3.0 Compliance with National Policy In Support of Renewable Energy

It is imperative that certain policies and objectives be strengthened to ensure compliance with the Government's current guidance and existing policy in relation to the development of renewable projects and any subsequent updated guidance.

The new County Development Plan for 2018-2024 should continue to acknowledge the renewable energy commitments that have been undertaken at a local, national and European level and, in relation to electricity generation, it is imperative that further progress is made and that alternative renewable sources are further expanded and developed in the County.

The current *Wind Energy Development Planning Guidelines* offer advice to planning authorities assessing planning applications for wind farm developments. The guidelines set out criteria which assist in the identification of suitable locations for wind energy development. They are also of assistance to developers and the wider public in considering wind energy development.

IWEA notes previous variations to the current County Development Plan, which sought to introduce measures inconsistent with the *Wind Energy Development Planning Guidelines (2006)* and IWEA has made detailed submissions in relation to significant concerns over variations affecting the development of renewable energy in Co. Donegal, which still stand. IWEA considers it important that the planning authority and elected representatives make a plan consistent with national policy, ministerial guidelines and Section 28 of the *Planning and Development Act 2000, as amended*. Any amendments to the plan should be consistent with the current *Wind Energy Development Planning Guidelines* or any subsequent successor guidance. This is crucial in order to provide progressive and sustainable measures to combat climate change effects whilst providing for future energy requirements.

IWEA does not consider provisions, such as that contained in proposed Variation (No. 2) to the Donegal County Development Plan 2012-2018 (as varied), as appropriate, practical, or consistent with the *Wind Energy Development Planning Guidelines (2006)*.

IWEA would like to clearly reiterate that the setting of such a separation distance (as proposed by Variation No. 2) under any future County Development Plan, 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.

For the reasons set out in our detailed submission of August 14, 2014, IWEA considers that in this new Development Plan, Donegal must avoid unnecessarily and inappropriately restricting the implementation of national and local policy to generate additional electricity from renewable sources. This approach would only serve to 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 strategic sustainable development.

4.0 Conclusion

IWEA is hopeful that the new Donegal County Development Plan 2018-2024 will contribute to achieving the continued development of the wind and wider renewable energy resource. We welcome the positive outlook taken within the Issue Paper Number 5 on the renewable energy options for the county, and believe this is a valuable opportunity for Donegal County Council, by taking a proactive approach, to realise, in an appropriate manner, the wind and 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 the wind energy sector, 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 the forthcoming development plan objectives should not stipulate site specific design constraints. Appropriate design constraints will be informed by the detailed project design process undertaken in tandem with the preparation of an Environmental Impact Statement for a project.

IWEA fully supports the provisions contained within the existing County Development Plan which seek to increase and foster further renewable energy development within the County. We would request that any proposals which run contrary to established Government strategic planning and sustainable development policies be omitted from the forthcoming County Development Plan 2018 - 2024. A positive approach to Donegal's renewable resource can ensure compliance with national guidance and support for Ireland's low carbon energy transition, while also allowing wind farm developments to be assessed on a more detailed case by case basis through our planning system. Reviewing wind farm applications on a specific project-by-project basis, through the planning system, 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 amenity.

To conclude, therefore, the expansion of the Irish wind industry is, and will be an extremely positive economic development for the entire country and, indeed, for County Donegal. It will result in greater job creation, as well as increased local authority income through commercial rates and development contributions and see significant benefits to local communities. 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 powered 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.

We thank you again for the opportunity to contribute to this important process, and welcome the opportunity to discuss this submission further with you.