



Irish Wind Energy Association,  
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Mr. Eoin Bennis  
Planning Section,  
Dept. of Housing, Planning, Community and Local Government,  
Custom House,  
Dublin 1.

1<sup>st</sup> September 2016

By email to Eoin.Bennis@housing.gov.ie

**Re: Independent Report on the Section 31 Ministerial Draft Direction to the Co. Westmeath County Development Plan**

Dear Mr. Bennis,

The Irish Wind Energy Association (“IWEA”) is Ireland’s leading renewable energy representative body and as such has an active interest in the wind energy and related policies of the Westmeath County Development Plan and the Ministerial Draft Direction to same.

IWEA has been an active participant to positive strategic planning in Westmeath, having made seven separate previous submissions since April 2012 through the formulation phase and to individual variations of the current Development Plan.

IWEA has been clear in voicing our strong concerns on the matters now subject to this Section 31 Direction. IWEA has at all times been clear and consistent in our desire for there to be clear adherence to a strategic and sustainable planning approach in line with national and regional policy.

IWEA has read a copy of the report prepared by Mr. Bruce McCormack on the Variation and warmly welcomed the opportunity to meet, along with all parties, with Mr. McCormack and provide further information to the Inspector. IWEA supports the Ministerial Direction as set and calls for this Direction to be implemented in relation to this Variation for the reasons set out in this and previous submissions.

Yours sincerely,

\*sent by email, bears no signature

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Brian Dawson,  
Head of Communications,  
Irish Wind Energy Association (IWEA).

## Introduction

It is important we must recognise Ireland's obligation and our need to support renewable energy as set out under EU Directive 2009/28/EC on the Promotion of the Use of Energy from Renewable Sources, which establishes a binding target of 20% of overall EU energy consumption to come from renewable sources by 2020. Ireland's mandatory target under Directive 2009/28/EC is for renewable sources to account for 16% of total energy consumption by 2020. Ireland's National Renewable Energy Action Plan (2010) sets out how Ireland intends to achieve this binding national renewable energy target of 16% with renewable electricity to account for 40% of total energy consumption by 2020. In Autumn 2014, Ireland agreed to new binding EU 2030 energy targets, which proposes to achieve a 40% reduction in greenhouse gas emissions by 2030 relative to 1990 and a binding EU wide target for renewable energy of at least 27% by 2030. These targets require that renewable energy will be a critical and growing component of Ireland's energy supply to 2020 and beyond. Failure to meet these binding targets could result in EU sanctions.

Wind energy contributes positively and significantly to the supply of electricity in Ireland. EirGrid's Generation Capacity Statement 2016-2025<sup>1</sup> (February 2016) states that the amount of wind energy in Ireland has reached 2,400MW. Provisional SEAI figures from 2015 show that over a fifth of Ireland's electricity generation was met directly from wind energy and Irish wind energy output increased by 28% in 2015. Irish wind energy as an indigenous renewable energy source is helping to cut our 85% energy import dependency and according to the SEAI, in 2014 alone it saved Ireland over €200m in energy imports as well as reducing Ireland's CO<sub>2</sub> emissions from electricity generation by over 16%. Furthermore, EirGrid in their Generation Capacity Statement estimates that between 3.8- 4.1GW of wind may be required to meet our 2020 renewable electricity target of 40%. This means an average of approximately 300MW of extra wind capacity will be required to be installed per year up to 2020.

As detailed in our previous submissions dated 23<sup>rd</sup> March 2016 and 10<sup>th</sup> June 2016, IWEA questions why wind energy has been specifically singled out among sectors as the direct focus of the Draft Variation 1 considering that clear national wind energy development guidelines are cited within the CDP and have been provided by Government specifically for the guidance of strategic and sustainable wind energy development.

IWEA welcomes the findings contained in the Independent Inspectors Report and the conclusion that the revised policy framework under Draft Variation 1, would be significantly inconsistent with both national and local policy and contravene the National Spatial Strategy (2002-2020), Regional Planning Guidelines for the Midland Region (2010-2022), the existing Wind Energy Development Guidelines (2006) and the Westmeath County Development Plan (2014-2020), specifically Objective P-WIN3 *'to ensure the siting and development of wind turbines is carried out in accordance with the requirements of the DoEHLG Wind Energy Development Guidelines 2006, and as otherwise amended'*.

Relative strategic policy documents such as the Westmeath County Development Plan, must assist in enabling Ireland to develop its renewable energy resources and meet our EU2020/2030 targets. As

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<sup>1</sup> [http://www.eirgridgroup.com/site-files/library/EirGrid/Generation\\_Capacity\\_Statement\\_20162025\\_FINAL.pdf](http://www.eirgridgroup.com/site-files/library/EirGrid/Generation_Capacity_Statement_20162025_FINAL.pdf)

detailed in our previous submissions to Westmeath County Council the Draft Variation 1 proposal lacks factual basis and represents an overt attempt to stifle positive renewable energy development in the county. We also note that the proposal of this Variation runs directly contrary to the Government's Circular Letter PL 20-13.

## Night Time Noise Limit of 30dB of $L_{\text{night, outside}}$

IWEA supports proper planning and sustainable development and believe that the application of any noise condition should allow for an appropriate balance between the protection of residential amenity while allowing for a well-planned and well-designed development.

IWEA agrees with the Inspectors determination that the stringent night time noise limit proposed in the Draft Variation 1 will result in the need for increased separation distances well above the DoEHLG Wind Energy Development Guidelines 2006, significantly reducing the number and range of sites available and unnecessarily and inappropriately restricting viable wind energy development in the county.

The Inspectors Report acknowledges that a noise source of 30dB is the equivalent to a whisper. It also recognises that the setting of such a conservative noise limit as proposed in the Draft Variation 1 is particularly conservative compared to the WHO Night Noise Guidelines for Europe (2009) recommendation of 40dB  $L_{\text{night, outside}}$  for the protection of public health and substantially different to the DoEHLG Wind Energy Development Guidelines 2006. The implications of setting such a stringent noise limit would severely restrict the opportunities for wind farm developments in Co. Westmeath which would otherwise be acceptable on other planning grounds.

**IWEA supports the findings of the Inspectors Report and wish to reiterate that Planning Authorities should have regard to current national policy and should not apply various noise thresholds for wind energy developments. IWEA reject the Draft Variation 1 proposal and remain firmly of the view that the DoEHLG Wind Energy Development Guidelines 2006 should remain in effect until they are revised or updated based on scientific evidence.**

## Equine Facilities

In Ireland, noise sensitive receptors are defined in both the Environmental Protection Agency's (EPA) noise guidance notes and the DoEHLG Wind Energy Development Guidelines 2006. IWEA agrees with the Inspector's findings that the Draft Variation 1 proposal for registered equine facilities to be regarded as noise sensitive receptors contravenes the DoEHLG Wind Energy Development Guidelines 2006 and could effectively allow for the blocking of wind energy developments where equine facilities are registered solely for the purposes of preventing a wind farm development from proceeding.

IWEA wish to reiterate that a broad range of animals both domestic and wild, including livestock are common on Irish wind farms and that no factual sources of scientific research have been identified which support any reduced noise level due to potential impact on horses.

**IWEA do not see basis or need for registered equine facilities to be regarded as noise sensitive receptors and IWEA does not believe there is any evidence to support this claim. IWEA welcomes the Inspectors findings in this regard.**

## Area 7 Designation

As detailed in our previous submissions to Westmeath County Council (23<sup>rd</sup> March 2016 and 10<sup>th</sup> June 2016), the Draft Variation 1 does not provide any explanation for the removal of the only area considered by Westmeath County Council to have medium capacity for wind energy development and the subsequent designation of all areas within the county as either 'low' or 'no' capacity for wind energy development. IWEA is concerned that the reclassification of Area 7 has been proposed without foundation and is not based on an objective assessment.

**IWEA stands in support of the Inspectors findings that the designation of Area 7 as medium capacity should remain.**

## Conclusion

In our continued positive engagement with Westmeath County Council, IWEA has been clear in voicing our strong concerns on the matters now subject to this Section 31 Direction.

IWEA supports a nationally consistent and strategic approach to development and as detailed in our previous submissions, the Draft Variation 1 which is subject to the Section 31 Ministerial Direction is in contrast to proper strategic planning and lacks factual basis. It will unnecessarily and inappropriately restrict the implementation of both national and local policy to generate additional electricity from renewable sources that would otherwise satisfy the requirements of the County Development Plan, National Policy and Guidelines and the requirements of proper planning and sustainable development.

**IWEA fully supports the recommendation of the Inspector that the Minister for Housing, Planning, Community and Local Government should issue a Direction on the basis of the Draft Direction dated 20<sup>th</sup> May 2016 and remove the Draft Variation 1 proposals.**