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Millennium Park,
Osberstown, Naas,
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Planning Department
Kilkenny County Council
County Hall
John Street
Kilkenny

15th June 2018

Submitted by email to: at ourplan@kilkennycoco.ie

Re: Pre-Draft Issues Paper - Kilkenny County Development Plan 2020-2026

Dear Sir/Madam,

The Irish Wind Energy Association (IWEA) is the leading renewable energy representative body in Ireland and as such has an active interest in the potential for renewable energy, and in particular wind energy, in Ireland. IWEA works in a proactive and engaging manner with stakeholders in this area. IWEA welcomes the opportunity to engage in consultation on the new Kilkenny County Development Plan 2020 -2026 and make important observations regarding the wind industry and wind energy in general.

IWEA believes the challenges and opportunities for Ireland regarding renewable energy and the need to move away from fossil fuel imports are sparking increased debate in communities and at local authority level. This debate is important and should be conducted with respect. Ireland is heavily dependent on imported fossil fuels to meet its energy needs. This high dependency on foreign energy imports is unsustainable and leaves our country vulnerable both in terms of meeting future electricity needs and ensuring price stability.

However, increasingly, renewable energy sources, particularly onshore wind, have added significant capacity and greater levels of self-sufficiency. This can continue in the years ahead with clear, credible, evidence-based policy making.

Ireland has the capacity to benefit greatly from an ambitious renewable energy agenda. There are also associated positive economic and FDI impacts from the availability of wind and renewable energy in Ireland. IWEA believes Ireland can be a world leader in renewable energy generation and renewable energy technology.

The increasing demand for energy in Ireland as a result of growth in the economy shows there is a need to provide more renewable energy sources in order to support this. Official data published by SEAI on 2015 shows 22.8% of Ireland's electricity came from wind with 2.5GW of capacity installed. SEAI predict that given favourable developments in policy and infrastructure, Ireland can achieve deployment of between 11GW - 16GW of onshore wind by 2050.

IWEA believes Ireland requires a strong and stable diversified renewable mix to provide our energy. To date Ireland's renewable energy has been dominated by onshore wind. While IWEA believes that there is a role for solar energy development in Ireland as part of a more diversified renewable energy agenda, the case for onshore wind energy development in Ireland remains strong. Onshore wind costs are forecast to reduce by 26% by 2025. The Draft National Mitigation Plan, published by the Minister for Communications, Climate Action and Environment Denis Naughton, rightly notes that **"onshore wind has to date been the most cost-competitive renewable electricity technology in Ireland."**

IWEA supports the view as outlined in the 2006 Planning Guidelines on Wind Energy Developments, issued under Section 28 of the Planning and Development Act (as amended), which state that **planning authorities must prepare and adopt policies that will maximise the contribution that wind energy can make in meeting overall binding EU commitments in relation to renewable energy generation, commensurate with reasonable local requirements such as protecting sensitive habitats or landscapes.**

IWEA believes social acceptance of wind energy projects in host communities and prospective host communities is crucial to achieving increased renewable energy use in Ireland.

IWEA is committed to working with policymakers on clear achievable changes in this area. IWEA believes this work would benefit from the existence of new strategic partnerships with community-based organisations and clear national policy objectives that are proactively discussed on a regular basis with the public.

IWEA supports efforts to bring about a more open and welcoming environment for renewable energy projects throughout the country. We believe there is a strong basis for this and note that the National Mitigation Plan 2017 states:

Community Engagement, Participation and Acceptance, Spatial Planning and Regulation

“A fully joined up and integrated approach, involving public sector bodies at national, regional and local level, will be necessary to address existing legitimate community concerns, and obstacles and delays that might hinder the achievement of low carbon targets for electricity generation. In particular, the expansion of renewable electricity and other forms of renewable energy raises issues of community engagement, participation and acceptance. While investment in infrastructure is an essential precondition for the expansion of renewable energy, community concerns have been raised in relation to the provision of this energy infrastructure. Effective community engagement is essential for building public confidence and will help Ireland achieve our transition to renewable electricity.”

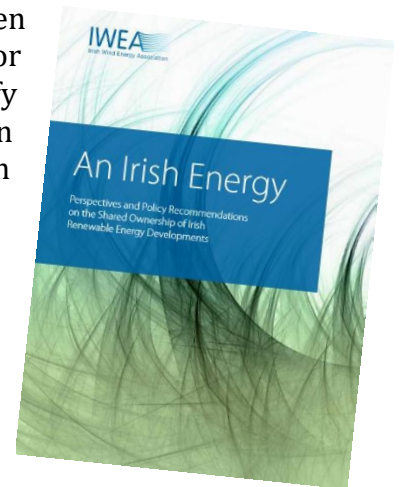
IWEA believes the empowerment of local communities through greater access to independent information is a significant part of achieving greater awareness of the importance of renewable energy projects and social acceptance.

IWEA believes local authorities should be resourced and financed to provide this support to communities and developers. There is a clear role for local government and central government in communicating national policy and promoting the importance of renewable infrastructure and investment.

Beyond 2020 Ireland will have new, ambitious targets for 2030. A renewable energy target of at least 27% will require a significant shift in thinking among policy-makers, industry and society. It is crucial the public is informed and educated about Ireland’s policy-making in that regard. IWEA believes the public at large support ambitious renewable energy alternatives for Ireland and will support sensible and credible policy to deliver this.

The wind industry is always seeking new ways to contribute to vibrant communities. This includes supporting the wider objective as set out under the Energy White Paper “*Ireland’s Transition to a Low Carbon Energy Future 2015-2030*” to move from a point of passive consumers to active energy citizens with roles and responsibilities in our national low carbon energy transition.

While most wind and renewable energy projects in Ireland have been successfully and sustainably delivered through private sector investment, IWEA recognises and welcomes the desire to diversify ownership structures. IWEA produced a dedicated document in Spring 2017 entitled *An Irish Energy*, the first sectoral perspective on approaches to shared ownership of renewable energy projects.



It is important to note that this paper was produced to contribute to a rich conversation on this issue and does not claim to be speaking for all stakeholders, as wind energy developers are only one partner in possible shared ownership structures. The paper provides a clear industry perspective on principles and possibilities, alongside 10 policy recommendations to enable joint shared ownership approaches which are viable and can succeed. IWEA believes if communities can acquire a stake in projects they are more likely to be disposed to hosting a project in their community.

It's important also to stress that shared ownership is to be seen within the prism of existing community engagement and benefit options not as an exclusive approach. IWEA believes that shared ownership should play a role as an option in Ireland's future renewable energy development alongside community benefit and options for developing Ireland's Energy Citizenship.

For shared ownership to be successful it must work for all parties, and there must be a stable regulatory environment and support. Communities must be empowered and enabled with the independent financial and advisory support necessary for informed decision-making. IWEA believes there is also a positive and proactive role for Government and agencies of the State in enabling and facilitating shared ownership.

IWEA believes there are three fundamental points that must be recognised from the outset however. There can be no "one size fits all" approach as project specific and community specific solutions are as diverse as communities themselves. Communities will require access to expert finance for advice, planning and project development from the earliest stages. Shared ownership is an investment and like all investments, it involves risk. This risk must be clearly explained, acknowledged and where possible, mitigated against.

IWEA's 10 recommendations on Shared Ownership

1 – In a competitive market for investment in Irish energy, there must be clear added value for all parties involved in shared ownership projects to support and encourage them in leading shared ownership as an approach

2 – Existing renewable energy authorities and agencies need to be resourced by the State to provide independent support to interested communities

3 – Communities must be enabled to appoint a community project manager themselves to act as a lead point for engagement on shared ownership projects

4 – Local Authorities should play an active role in planning and promoting shared ownership, ideally through a specific Renewable Energy Officer role

5 – Investment risks must be clearly explained, understood and in as much as possible mitigated against

6 – Existing wind energy development levies should be ring-fenced to empower local communities seeking a more active involvement in our low carbon transition

7 – A register of independent and accredited advisors for communities to protect communities should be developed and maintained

8 - Enterprise and investment agencies at state level should play a role in enabling access to innovative financing for shared ownership investments

9 – Target and promote tax incentives for shared ownership investment by small scale investors. Examine proposals for use of local Post Office and Credit Unions as green investment aggregators for those wishing to invest in shared ownership opportunities, breathing new life into Post Offices and local Credit Union networks

10 – Take forward shared ownership through a fact based multi-stakeholder forum with expert input

Ireland requires policy certainty in the area of renewable energy. IWEA believes Kilkenny can play a strong and active role in Ireland's renewable energy journey and we believe there would be significant benefits to the county in doing so.

For example, under the current commercial rates regime in Kilkenny IWEA calculates that a 20-megawatt wind farm in Kilkenny, made up of 8 to 10 turbines, could generate an additional €270,000 a year in commercial rates paid to Kilkenny County Council with additional development contributions over and above that. A wind farm of this nature would also produce electricity for 13,000 homes.

IWEA will continue to urge Kilkenny County Council and all local authorities to embrace the renewable energy challenges facing Ireland as an economy and a society. IWEA is very firmly of the view that Ireland requires clear national policy that explicitly supports increased indigenous renewable energy, including wind, in order to transition to a low carbon economy.

IWEA looks forward to the publication of Stage 2 – the publication of the Draft County Development Plan in due course and will engage with further comments and observations at that time. In the interim we remain available to assist or support the council and its elected representatives with additional or supporting information as appropriate.
