

Irish Wind Energy Association,  
Sycamore House,  
Millennium Park,  
Osberstown,  
Naas, Co. Kildare

Nicholas O’Kane,  
Senior Planner,  
Planning Department,  
Farnham Street,  
Cavan Town

By email to: [plan@cavancoco.ie](mailto:plan@cavancoco.ie)

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**Re: Draft County Cavan Development Contribution Scheme 2017-2020**

The Irish Wind Energy Association (“IWEA”) is Ireland’s largest renewable energy representative body, and as such 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 and promotes awareness and understanding of wind power as a primary Irish renewable energy resource. IWEA members are involved in more than 85% of the wind farm capacity planning to build from now to 2020 and wind energy today delivers over a fifth of Ireland’s electricity annually.

IWEA welcomes the opportunity to respond to the consultation on the Draft County Cavan Development Contribution Scheme 2017-2020. We would also welcome the exemption of Renewable energy development which is not supplying electricity to the national grid or for export as a display of positive support for renewable generation from Cavan County Council.

IWEA has, however, strong concerns regarding the proposed contributions for renewable energy developments. The proposed contribution for Renewable Energy Development, such as Windfarm Development and Solar Farms, of €2,000 per 0.1 MW, or €20,000 per MW, marks a dramatic rise in development contribution levels since the previous rate of €15,000 per turbine, under the 2013 Scheme or €5,000 per MW, where the standard turbine capacity is taken as 3 MW.

This payment for commercial wind turbines in Cavan would represent a significant increase for a standard 3MW turbine, which, under the proposed new development contribution level of €20,000 per MW, would amount to an **€60,000** charge per turbine. **This represents an unjustified and wholly excessive increase of 300% for a standard 3MW wind turbine.**

IWEA notes that the current *Cavan County Development Plan 2014-2020* commits to support the development of renewable energy in *Section 4.7 Energy*, and specifically under Council Policy objective number PIO104 makes the commitment to: -

*“Promote renewable energy policies in the county and ensure that Council staff are given the necessary training to implement this policy.”*

In section 4.7.3 Renewable Energy Cavan County Council commits to: -

*“securing the maximum potential from wind energy resources commensurate with supporting development that is consistent with proper planning and sustainable development. It is the policy of the Planning Authority to adopt a favourable approach to wind energy developments provided they are sited so as not to cause a serious negative impact on the special character and appearance of designated conservation areas, protected structures or sites of archaeological importance.”*

IWEA believes that this significant Development Contribution rise runs contrary to the existing provisions of Cavan’s current County Development Plan, as this scale of increase in the proposed development contribution rates could impair both community and commercial wind and other renewable energy developments in the county. **Therefore, IWEA calls for this excessive development charge to be reverted to the previous lower rate of €15,000 per turbine for Cavan County Council.**

Every new wind farm development provides a substantial contribution to the local and national economy through local direct investment, job creation, local authority rates, land rents and increased demand for local support services in construction, operation & maintenance, legal and accounting and project management. Wind farm developments also provide community benefits as set out in the *IWEA Best Practice Principles in Community Engagement & Community Commitment*<sup>1</sup>. More wind energy on the system will also result in lower and more stable electricity prices for consumers while helping us achieve our energy and climate targets.

As outlined in the Government Development Contributions Guidelines for Planning Authorities: *“Development contributions are not cash-cows: there is an important balance to be struck between the funding of public infrastructure and the need to encourage economic activity and promote sustainable development patterns. It is essential that development contribution schemes do not impede job creation or facilitate unsustainable development patterns.”*

IWEA would also like to draw attention to the following requirement also contained within the Government Development Contribution Guidelines for Planning Authorities<sup>2</sup>: *“Planning authorities **are required** to include the following in their development contribution schemes: Options for reduced charges in respect of renewable energy development to promote uptake of renewable energy technologies.”*

In that context, IWEA believes that the scale of **development contributions proposed for wind energy in Cavan is excessive and without recognition of the requirements of the current Government guidance.**

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<sup>1</sup> <http://www.iwea.com/iweabestpracticeprinciplesinco>

<sup>2</sup> <http://www.environ.ie/en/Publications/DevelopmentandHousing/Planning/FileDownload,32162,en.pdf>

**We would welcome the opportunity to meet with you to further discuss.** We would also finally propose that wind turbine linked development contributions should **be 'ring-fenced' for use directly in the local communities hosting the wind farm.**

Yours sincerely,

*\*Sent by email, without signature.*

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Stella Burke  
Communications and Policy Assistant  
Irish Wind Energy Association

Phone: (045) 899341

Email: [stella@iwea.com](mailto:stella@iwea.com)