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Brian Clancy, Administrative Officer,  
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Civic Offices, Nenagh,  
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By email to [planning@tipperarycoco.ie](mailto:planning@tipperarycoco.ie)

22 August 2016

**Re: Submission on Proposed Material Alterations to Proposed Variation No. 3 of the North Tipperary County Development Plan 2010-2016 and South Tipperary County Development 2009-2015.**

Dear Mr Clancy,

IWEA has already made a detailed submission, dated May 23rd, to the Proposed Variation No. 3 to the North Tipperary County Development Plan 2010-2016 and South Tipperary County Development 2009-2015, on the Draft Wind Energy Strategy 2016 of which is of particular interest to the IWEA, as the leading on-shore wind energy representative body in the country.

IWEA wishes to avail of the opportunity now afforded during this current consultation period, to comment on the Proposed Material Alterations to Proposed Variation No. 3.

## **1.0 IWEA Comments on Proposed Material Alterations to Proposed Variation No. 3**

### **1.1 Changes to Wind Energy Policy Areas Map**

There has been significant changes to proposed to Wind Energy Policy Areas for the County, and IWEA would question the move, under the Material Alterations to reduce the viable areas available for wind energy development in the county.

The areas now proposed as Unsuitable for New Development generally coincide with the elevated lands in the County. The designation of additional unsuitable areas in the County would halt wind energy developments from many elevated areas in the County, where the greatest wind resource exists, and which already have a pattern of road and grid infrastructure development to accommodate

additional wind turbines. This will have an indirect effect of curtailing socio-economic benefits in these areas where sustainable and long term rural development is an ongoing and critical issue.

In this regard, we note Map 1.1: Roscrea Area, Map 1.2, Map 1.3: Littleton Bog and Grange Barna and Map 1.5: Hollyford Hills & Silvermines Area, which while having somewhat stepped back from original proposals in relation to the areas deemed as Unsuitable for New Development, still remains unnecessarily restrictive.

IWEA would also disagree with the changes to Wind Energy Policy Areas Maps as proposed in Variation No. 3 and now in the Proposed Amendments to the Variation where in Map 1.4: Dualla/Killhill the area deemed Unsuitable for New Development is further increased.

## **1.2 Areas Acceptable in Principle**

Tipperary has a strong natural resource in its wind and renewable energy, which can be harnessed for the benefit of the County, its local economy and communities. IWEA would question why the new proposal does not positively identify any areas in the County that are acceptable in principle for wind energy development.

The new proposal does not identify any areas in the County that are acceptable in principle for wind energy development, an approach which stands contrary to Chapter 3: Wind Energy and the Development Plan of the Wind Energy Guidelines where it is stated that the development plan should set out:

*the identification on development plan maps of the key areas within the planning authority's functional area where there is significant wind energy potential and where, subject to criteria such as design and landscape planning, natural heritage, environmental and amenity considerations, wind energy development will be acceptable in principle;*

If the Variation is adopted then County Tipperary will no longer have such an area identified.

## **1.3 Changes to text**

IWEA welcomes the proposed changes to TWIND 4.13 where proposals for extensions of existing windfarms of up to 20% and revised proposals where an existing windfarm has been permitted and expires, will be considered for planning.

In addition to these changes, IWEA proposes the following changes (a), (b) and (c) to the new text of TWIND 4.13:-

***TWIND 4.13*** *Proposals for wind farm development may be considered on a case-by-case basis in the following limited circumstances;*

- a) *Where there are existing wind farms in these areas, proposals for ‘repowering’ or extending existing planning permission ~~may~~ will be favourably considered ~~appropriate~~, on a case by case basis. Repowering is the process of replacing older turbines with newer ones that either have a greater capacity or more efficiency which results in a net increase of power generated. Proposals for repowering or extending the existing planning shall not result in a net increase in turbines, and it shall be demonstrated that there is no adverse impact on the receiving environment. Or*

IWEA and all of its members are committed to ensuring that any new development proposals located within or adjacent to Natura 2000 sites are plan-led, site sensitive, sustainable and designed to meet the stringent requirements set down in the in the Birds and Habitats Directives and the associated Regulations & Guidance to protect these sites, and to ensure that no adverse impacts occur as a results of such proposals IWEA is clear that there should be no blanket prohibition of development in or adjacent to Natura 2000 sites. The exclusion of these areas runs contrary to specific EU Commission advice on the implementation of Natura 2000 regulations which states that:

*“The Habitats Directive does not, a priori, exclude wind farm developments in or adjacent to Natura 2000 sites.”*

Exclusion at both (b) and (c) below of Natura 2000 sites is unnecessarily restrictive and not informed by prescribed practice in the preparation of AA, including NIS which require a cumulative assessment, for windfarm projects seeking planning anywhere in or near a Natura 2000 site. During the planning process there is requirement to investigate the impact on the subject designation and adopt construction and operational methodology to mitigate such impact. These practices have become the norm for wind farms both inside and outside Natura 2000 sites.

These need to be judged on a case by case basis in line with the Natural 2000 guidelines, IWEA strongly believe that the placement of Natura 2000 sites should be considered as areas “Open to Consideration” as opposed to “No-Go” Areas as these sites would be subject to rigorous protection

under the applicable legislation which is applied on a case-by-case basis in accordance with best practice, taking into consideration the merits of the individual proposal and also assessing the proposal in combination with other proposals and spatial considerations which have the potential to impact on Natura 2000 sites.

IWEA submits that Natura 2000 sites should not be automatically excluded and that wind energy proposals should be considered on a case by case basis in these areas:

- b) ~~In areas located outside of Natura 2000 sites,~~ *Proposals for an extension to an existing wind farm (of up to 20% in terms of permitted numbers of turbines or in cases where 5 or less turbines are permitted in a wind farm, one additional turbine) will be considered. The proposal will be required to demonstrate that the additional turbines may be **substantially** served by the infrastructure serving the existing development.*
- c) ~~In areas located outside of Natura 2000 sites,~~ *Where an existing windfarm has been permitted and expires over the lifetime of this Wind Energy Strategy, a revised proposal will be considered within the planning unit of the previously permitted development, and where it is demonstrated there is no net increase in turbines. All proposals will be required to comply with the policies and development management standards set out in the Wind Energy Strategy.*

IWEA would also propose in line with our submission dated May 23rd, 2016 that:

The change at (a) is needed to cater for existing windfarms where the planning is restricted to 20 / 25 years and where the developer wishes to apply to extend the life of the existing windfarm using the existing technology, where working life can be extended beyond a period of 20 / 25 years. This offers a sustainable use of wind turbine plant.

Repowering should also be given a more favourable consideration. It should be noted that in document 'SEAI Wind Energy Roadmap to 2050', it is recognised that repowering will drive onshore wind capacity and that repowering is very attractive for windfarms 20 years after installation, where improved capacity and efficiency is gained through the use of the most up to date technology and re-use of existing civil and electrical infrastructure.

The change at (b) above is required to allow for the addition of wind turbines that may be using only one part and not all of the existing infrastructure whether roads or electrical.

## 2.0 Conclusion

IWEA recognises Tipperary County Council's (both North and South) previously very supportive policy on wind energy development. The areas initially chosen as acceptable in principle (preferred areas) have proven to be well chosen. These areas have a coincidence of

- wind resource (being elevated)
- suitably sparsely populated (allowing for 500m separation distance from nearest residences)
- complex terrain (enhances landscape assimilation)
- landholding patterns (allows for the maximum benefit to local landowners thus aiding assimilation of the development into the local community fabric)

and these factors have contributed to the development of a dynamic wind energy industry in County Tipperary, delivering benefits to County Tipperary in the form of commercial rates, guaranteed long term landowner lease payments and community benefit schemes. County Tipperary is also contributing a significant amount of installed RE-E which is of benefit to our national balance of payments and attainment of international RE targets.

IWEA encourages County Tipperary to continue to offer positive support to renewable energy developments in the County, and we would welcome the opportunity to speak further with you on this submission.

Yours sincerely,

\*Sent by email.

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Brian Dawson  
Head of Communications,  
Irish Wind Energy Association.