

9th November 2017
NPF Submissions,
Forward Planning Section,
Department of Housing, Planning,
Community and Local Government,
Custom House,
Dublin D01 W6X0
npf@housing.gov.ie

Re: Ireland 2040 Our Plan National Planning Framework

1 Instructions

We act on behalf of Giancarla Alen-Buckley, and Michael Alen-Buckley, [REDACTED]
[REDACTED]

2 Submissions

We hereby make submissions as follows:

- 2.1 The NPF is aligned with a new, ten-year national investment plan from 2018- 27. It is critical therefore that all projects and planned investment in infrastructure is rigorously evaluated in terms of cost benefit analysis to ensure investment is prioritized into key projects with optimum overall national benefit based on evidence.
- 2.2 The expert ESRI group has highlighted that failure to plan will result in Haphazard approaches to planning for infrastructure and climate action. The current over reliance on wind energy as a solution to renewable energy needs has fueled such a haphazard approach to date where wind energy farms are dispersed throughout rural areas with little or no relationship to end user demand or need and no evaluation of the costs and benefits. The generation of wind energy has exceeded energy demand and generated more than a two fold excess of supply over demand without proper evaluation of costs and or cost benefit analysis or real evaluation of impact on carbon emission savings as a result.
- 2.3 This approach has further generated demand for significant national investment in grid infrastructure, which is unjustified in the context of proper evaluation of cost benefits associated. There has been no overall study or evaluation of the real costs of renewable energy from wind and the extent of subsidies as provided for under the REFIT schemes has perpetuated this hap hazard dispersed approach which is unsustainable.
- 2.4 Total electricity generating capacity in Ireland exceeds peak demand by a large margin. In round numbers the total installed capacity is about 10,000 MWs, while peak demand (typically a cold evening in January) is only about half this figure. Low demand (say very early morning during a July warm spell) can be less than half of this. The capacity of existing wind farms, about 3070 MWs, exceeds minimum demand. If wind-speeds are adequate there are times when it is apparently possible to meet demand from wind alone although there cannot be complete reliance on intermittent power sources for system operation reasons.

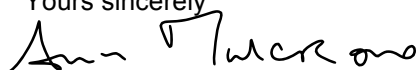
- 2.5 As a result of excess capacity the utilisation of many conventional stations is poor, particularly when wind-speeds are good. Many Irish conventional generating units do not produce power most of the time and some modern gas units have effectively been mothballed. The gas board, BGE, has been reported as having sustained a large capital loss on the recent disposal of a modern gas-fired unit in county Cork. This is clearly unsustainable and poor use of existing infrastructure and investment.
- 2.6 As more and more intermittent units, whether wind or solar, are added to the system, the likelihood increases that these units will be available at times of low demand. They must therefore be 'constrained off'. While operators may be entitled to compensating payments in these circumstances the utility of building additional units, in terms of reaching renewable energy targets, will diminish. This suggests that there is a limit to the value of incremental construction of such wind farms in terms of climate change policy.
- 2.7 However wind-farms continue to be planned and delivered, reflecting the subsidy regime rather than sustainable long term planning for minimising energy consumption.
- 2.8 A margin of surplus over peak demand is normal practice in planning overall system capacity. However the current margin in Ireland (dispatchable plants alone provide a significant surplus over peak) is very large by international, or Irish historical, standards.
- 2.9 Therefore a removal of all subsidies for wind energy generation should be implemented as part of the NPF in order to secure a coherent investment and locational land use strategy for energy infrastructure. A moratorium on the construction or planning of any further wind farms is justified in the context of the scale and extent of the existing wind farm capacity and the scale of oversupply of generating capacity nationally. Any future proposals for wind energy should demonstrate cost effectiveness without subsidy.
- 2.10 Over 204 local community groups from across Ireland have come together to highlight their direct opposition to wind farm development. The issue of wind farm development has divided communities across Ireland in a socially destructive manner.
- 2.11 While our clients support the Country's commitment to addressing climate change, a central message of our submission is that there is a need to review how this is achieved. There is widespread public opposition to a further roll out of wind farms as the main basis of this policy as they generate particular and specific environmental implications for communities, which are no longer acceptable and there is little evidence of concern for impacts on human beings.
- 2.12 The capacity of the country to accommodate any new wind energy development is compromised by existing over development within a limited grid infrastructure and limited energy market. The reduction in carbon emissions from further wind energy generation are limited as the country continues to burn coal and peat in power stations for the times when the wind doesn't blow and take up the slack in wind inconsistencies.
- 2.13 The NPPF objective "*7 Sustainable Self Reliance*", particularly the progress toward a low carbon economy would be better achieved through the conversion of Moneypoint to biomass. This scenario has been tested by the ESB and shown to work. The Conversion of Moneypoint has the advantage of using the existing site. This is an important policy option and consideration of reuse and conversion of existing energy infrastructure sites or similar brownfield sites should be considered as a first option in any renewable energy development strategy. This should be identified as a sustainable objective for inclusion in the National Capital Investment Plan.

- 2.14 This project should be included as an alternative means of achieving a low carbon economy, which can support a coherent and focused investment in renewable energy infrastructure in a single location avoiding the need for significant investment in grid infrastructure and avoiding hap hazard location of wind turbines in sensitive rural landscapes. The conversion of Moneypoint would also address the issue of intermittent supply posed by overreliance on wind energy.
- 2.15 The conversion of Moneypoint to biomass would support National Policy objective 56 to reduce carbon footprint and would further support national policy objective 57 to support renewable energy generation at appropriate locations within the built and natural environment.
- 2.16 The NREAP 2010 and the revised progress reports and the White Paper, Irelands Transition to a Low Carbon Economy 2015-2030 incorporates at para 128 that: *“Onshore wind continues to be the main contributor (18.2% of total generation and 81% of RES-E in 2014)”*. This thinking appears to be incorporated into the National Planning Policy Framework without examination of the evidence to support such reliance on wind energy.
- 2.17 The National Planning Policy Framework focuses on the three pillars of sustainability, security of supply and competitiveness. Moneypoint conversion supports all three pillars renewal of a brownfield site, would provide a secure continuous supply and is economically competitive and would support biomass farming. In comparison wind energy falls down on all three pillars: sustainability in the light of overproduction, security of supply in terms of intermittent supply and lack of competitiveness due to reliance on subsidies and constraint payments for energy at periods of low demand. The conversion of Moneypoint to biomass has numerous advantages; it allows Ireland to meet its renewable energy targets, it is cheaper than building yet more wind farms, poses no risk to Ireland’s heartland industries of agriculture and bloodstock and could act as a catalyst to start Ireland’s own biomass industry
- 2.18 The NPF states that our transition to the low carbon economy requires decisions around development relating to wind energy and further requires legal and regulatory frameworks to meet the challenges in transitioning to a low carbon economy. Any regulatory interference by the Minister to impose wind energy developments within rural areas will encounter significant opposition.
- 2.19 To date there has been a deferral of any decision on the issue of new Wind Energy Guidelines. The current guidelines are out of date and no longer fit for purpose. At a minimum the new guidelines should specify a ratio of height to set back from turbines of 1:10 to retain the current position whereby the existing guidelines set back of 500m related to set back from turbines of 50m height. The current turbines are of the order of 176m height and should require a set back of 1.76km to maintain the former ratios.
- 2.20 The energy grid network has potential for significant impact on landscape and scenic amenity. These impacts should be avoided by clear policy direction in the NPPF to underground such infrastructure to avoid visual amenity impacts.

Concluding Statement

Removal of all subsidies for wind energy generation should be implemented as part of the NPF in order to secure a coherent investment and locational land use strategy for energy infrastructure. The Conversion of Moneypoint to biomass should be included as a key energy infrastructure objective and allied as a key project for inclusion in the national capital investment plan.

Yours sincerely



Ann Mulcrone