

From: Kathleen McClean [REDACTED]
Sent: 31 March 2017 07:52
To: National Planning Framework
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31/03/2017

NPF Submissions

Forward Planning Section

Department of Housing, Planning, Community and Local Government

Custom House

Dublin D01 W6X0

Ref. Consultation on “Ireland 2040 Our Plan – Issues and Choices”

To whom it concerns,

I refer to my email on 16th March 2017 advising that I would be submitting a written response to the consultation on “Ireland 2040 Our Plan – Issues and Choices” by the extended deadline of 31st March 2017. This letter is my written response as per my undertaking.

(1) The people most affected by developments have the least say:

The reality is today when a development is being proposed, the views of the local people most affected by the development have the least influence on the development, despite their legitimate and genuine fears and concerns. This has been especially true in relation to on-shore wind farm developments in Ireland for the last 10 years or more, but this must change if we are to truly “plan for a better future for all”. The process appears to be that once the planning guidelines set centrally are satisfied, local County Councils and even anBord Pleanala feel powerless to stop developments proceeding despite public opposition for the many legitimate reasons typically outlined in relation to same. This cannot be a fair, reasonable or logical approach to such critical matters given the impact such developments have on communities and the landscape, and the length of time people will have to live with such developments in their localities.

(2) Locations and people’s opinions differ:

Today on-shore wind developments have typically been located where there are the least amount of people to object to such developments even though there is tremendous adverse impact on the environment, community, tourism and heritage, as well as on people’s enjoyment of their homes. Alternative ways of achieving Ireland climate change obligations must be found other than on-shore wind. Advances in technology will create new opportunities for Ireland allowing it to have a diverse array of renewable generation from different technologies and sources which is a prudent vision for Ireland and moves away from to a current situation of Ireland being totally reliant on on-shore wind generation to combat climate change obligations.

Off-shore wind generation and solar offer clear alternatives, and in the future with advances in technology generation from wave and tidal could also play their part.

(3) Effective Development

Industrial on-shore wind farm developments should NOT be located in densely populated areas given their known negative impacts on communities and peoples their health and well-being, but in particular given that the turbines can be placed where their impacts are not felt by local residents, whether this be in a very remote location or moved off shore.

It is contended that “effective” development inherently must include a requirement for “efficient” development. On-Shore wind development costs have reduced significantly in the last 10 years (especially in the last 3) but Ireland has not adjusted it’s REFIT tariff subsidy regime for same. This is illogical, and blatantly disregards the responsibility entrusted by the people of Ireland in their elected government and their departments to ensure renewable developments are carried out in the least cost method possible so as to lower the overall cost burden of achieving Ireland’s climate change obligations. While many other countries in the world have scrapped their subsidies for proven renewable generation technologies like wind, or set in train a process to scrap them, Ireland has not taken such a step as yet. Not adjusting the REFIT subsidy not just makes no economic sense for Ireland and its people but also sends totally incorrect signals to renewable generation developers.

(4) Development of renewable energy sources other than on-shore wind should be encouraged:

Ireland has a target to achieve 16% of total final consumption from renewable energy in 2020. Ireland has decided to achieve this target with contributions of 40% from renewable energy in electricity (RES-E), 10% from renewable energy from transport (RES-T) and 12% from renewable energy from heat and cooling (RES-H). While Ireland is well on the way to achieving its 40% target for electricity by 2020 it has achieved very little in relation to transport and heat, and urgent action is needed on this.

The renewable energy developments in Ireland in the last 10 years have been almost exclusively from on-shore wind farms. This is despite the fact that this form of renewable energy has the greatest negative impact on the landscape, environment, and health of people and the local communities in which they are located. As Minister Coveney acknowledged on 10th March 2017 as reported in The Irish Examiner newspaper “I think we are reaching a point where communities on land are struggling to accept many more large-scale windfarms and many of you will be in communities that would be very resistant to [windfarm] planning applications.” He further acknowledged that “Offshore wind energy is moving to being cost competitive” and the reality is that the latest offshore wind farms in Europe to win at auction to be built without subsidy are at a cost of over 20% cheaper than the current subsidy rate used in Ireland for on-shore wind developments. Ireland must move any future wind turbines off shore and stop devastating local communities and the people living in them by large scale industrialisation of these areas beyond recognition with these large scale wind farm developments where today the turbines being erected are taller than the Spire in Dublin but have rotors creating a shape larger than a jumbo jet.

In terms other attractive renewable propositions solar energy costs have decreased even more over the last 3 years than either on-shore wind or off-shore wind and are now at a similar level to on-shore wind. This technology does not have the same unsightly impact on our beautiful landscape, nor the same negative impacts on property prices, health, or nuisance from flicker and/or noise. We await the government decision in terms of a subsidy for this form of renewable energy but given the experience in other countries NO SUBSIDY IS REQUIRED as it is cheaper than the subsidy Ireland currently gives to on-shore wind farms. Solar would give an improved diversification in terms of renewable energy to Ireland and for this, and the

inherent reduce negative health implications, solar farms should be prioritised ahead of on-shore wind farms.

Other renewable energy generation sources include wave and tidal but the technology for these is not at a stage yet where these can be commercially viable but this is expected to change with time. Given Ireland's unique position in Europe in terms of its potential from wave and tidal, there is a case to argue for subsidies to encourage the R&D required to advance these technologies to commercially viable solutions.

(6) Development challenges related to Agriculture and Transport have still be to be:

While some years ago the largest cause of carbon emissions in Ireland was electricity generation this has changed dramatically with the introduction of renewable generation in Ireland. In 2015 the largest contributor to green house gas emissions in Ireland was Agriculture, while the second largest was Transport (despite the RES-T target noted in point (5) above which Ireland committed to). Despite this the government in Ireland has done little if anything to address these areas of pollution of the people of Ireland. The utilisation of farm waste and slurry to produce biogas which is then input into compressed gas vehicles at suitably equipped filling stations outlines a clear complete mechanism to improve the emissions from both agriculture and transport. While pilot projects have successfully received funding, more needs to be done. Suitable infrastructure to allow compressed gas vehicles (including Compressed Natural Gas (CNG) vehicles) must be accommodated in our planning process, as well as the accommodation of planning for the slurry/farm waste processing facilities subject to they complying with strict environmental regulations.

The growth in renewable electricity generation in Ireland will create a situation where such generation will be generating when there is insufficient demand for the power it is creating. Electric Vehicles charging at such times create an obvious solution to this dilemma, where people are incentivised through lower night rate electricity to charge their EV vehicles overnight for example when there is lower system demand. The roll out of EV charging facilities to localities and homes to facilitate this activity needs to be given careful consideration in the whole planning process to ensure there are no barriers to optimising this activity.

Conclusion:

Ireland needs to stop any further on-shore wind farm development and exclude that from its 2040 planning. Such developments have immensely negative impacts on families and communities, in terms of negative economic, social, and health impacts to name a few. There are better alternatives for Ireland to use to achieve its climate change aspirations and targets such as solar farms and off-shore wind farms which are cheaper than the current REFIT scheme in Ireland for on-shore wind, and yet these alternatives have none of the same negative health and social impacts. Any on-shore wind farm which is already in the planning process should not be allowed to proceed without the government increasing the distance such developments must be away from local residential dwellings. At a minimum such developments should be 10 times tip height away from residential dwellings, or 1.5km, whichever is the greater. This is in line with informed, international, best practice. Such a move is essential for the health and well-being of the people in rural Ireland near any such onshore wind farm development.

Additionally, I would like to see incentives for retro-fitting buildings and homes with better insulation to reduce the need for electricity, coal and the like, which would ultimately benefit everyone due to lower energy costs and more comfortable living environments.

