



KILDARE ENVIRONMENTAL AWARENESS GROUP (K.E.A.G.)

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Draft National Planning Framework **Ireland 2040 Our Plan.**

Submitted by email to [**npf@housing .gov.ie**](mailto:npf@housing.gov.ie)

Dear Sir / Madam,

Kildare Environmental Awareness Group has an ongoing interest in the environment and its protection and in particular rural Ireland.

We welcome this opportunity to make this submission on the National Planning Framework and look forward to our points being actively taken on board with a view to the development of Ireland over the next 20 years and onwards.

It is important to us in rural Kildare that Kildare Environmental Awareness Group has the opportunity to be part of the process in shaping the future of our county.

In recent years Ireland and in particular rural Ireland has had many changes. Rural Ireland has in fact been neglected and it would appear that there is a Government agenda to depopulate areas.

This has happened due to many changes instigated by the Government with the closure of numerous services such as Garda stations, post offices and the complete neglect of rural transport services.

This has and will continue to have the effect of driving the younger population out of rural Ireland. It goes without saying that continuity of community existence is based on family life continuing.

Furthermore it is now known that the farming population is aging. Continuing policies should focus on encouraging more people into farming as farmers are the guardians of our landscape and food producers.

Many factors of further uncertainty within rural dwellers are the ongoing policies put forward by the government with regard to the spread of Industrial wind farms. This policy has torn communities apart with many people leaving who would have seen their future in rural Ireland but for the imposition or imminent threat of Industrial wind farms. Rural communities do not want Industrial wind farms imposed in their communities. Developers offer so called community gain to areas targeting certain people to be their spokespersons and even engaging sports celebrities on their behalf to try to influence communities.

It has been known at a conference on Public Consultation that one speaker urged developers to get in with the GAA and suggesting that people wear wellingtons and woolly jumpers when calling at doors in order to give the appearance of empathy with rural dwellers.

We acknowledge that climate change continues to be a serious environmental challenge. The lowering of carbon is one of the most important factors facing the planet.

To this end renewable energies are being adopted worldwide such as solar, wind, hydro, and biomass, biogas and landfill gas. Ireland to date through government incentives and policy has chosen an almost wind only renewable policy.

Wind performance is unreliable, intermittent and has had the effect of raising the electricity prices for all Irish business and households. Onshore wind is not a cost competitive renewable due to massive constraint and curtailment payments paid to other energy sources not to produce electricity as wind gets priority on the grid.

Our electricity demand is always at its highest during extremely cold weather. However during this type of weather the wind does not blow, so at a time when energy is most needed wind is not productive. The winter of 2010/11 is an example of a period of long term cold weather with temperatures up to minus 14 for weeks with sunshine and no wind. Weather forecasters are predicting a similar winter this year.

The more our energy production resources are taken over by private developers the higher the price of electricity. We have seen recently all electricity suppliers increasing their prices considerably.

We have seen in Ireland in recent years in the bank industry the lack of regulation or implementation of regulations which caused and is continuing to cause huge burdens on the Irish population. We saw the debacle in America some years ago

with the American energy company Enron. Proper regulation would have prevented this scandal from happening.

The government needs to be completely independent of thought and not follow the groupthink attitude of developers. Furthermore the government and local authorities must always be independent.

Whilst the wind industry continues to state that the wholesale price of electricity is cheaper and value for money, this in fact is a misnomer as the end consumer pays even more.

The true fact is that the government has guaranteed wind developers a certain rate of payment so the lower the wholesale price goes, the higher the consumer price ups due to maintaining the guaranteed price to the developers. Our PSO Levy has now risen again as a result of this. This further enforces that onshore wind energy is not good value for money

Furthermore the construction of Industrial wind farms is in effect destructive by virtue of the thousands of tonnes of concrete and steel required in the construction of a wind farm. The cement industry is one of the highest CO2 emitters.

Wind developers of course promote the use of wind energy often citing the use of much taller turbines of over 200 hundred meters in the future as being effective for energy production.

As infrasound and low frequency noise from wind turbines is the main problem for persons in rural Ireland apart from landscape destruction where wind turbines exist, taller turbines would in effect create greater problems with infrasound spreading over much longer distances. Given the correct weather conditions and landscape, the negative effects of infrasound have been known to travel distances of up to 60 km. This would then leave urban dwellers as well as rural dwellers open to the negative effects of infrasound and low frequency noise.

Of course as the current wind energy guidelines do not require wind energy developers to measure IFLN it would be an utter disaster and too late for urban dwellers if the current policy and proposals are continued and urban dwellers then felt the negative impacts of IFLN on their health. In particular the current policy will have a detrimental effect for county Kildare where large scale industrial wind turbines are proposed.

Furthermore

Solar PV performs better than wind as the resource uncertainty of wind is higher than solar. Solar by comparison out performs wind. Solar farms do not require the amount of concrete necessitated by wind.

Further innovations in solar are coming to the fore driven by France and Norway. This consists of integrated solar roof panels for housing and industrial units. Both France and Norway are leading in this area with solar panels for electricity and solar collectors for hot water.

This should be investigated seriously where any data centres are to be considered as it would give them onsite power and do away with unnecessary grid connections.

The government's policy of promoting onshore wind is ill thought out with the advent of new technologies coming to the fore we urge an immediate halt to the onshore wind programme as Ireland already has a large proportion of wind farms if the government are to follow through on their ideas or indeed the ideas of wind developers and their agendas it will result in massive destruction of rural Ireland, cause depopulation and waste lands.

History has demonstrated that depopulation of rural areas is disastrous for any country. In recent years we have seen the negative impact of rural depopulation in Romania. Further back we saw similar situations in China under Mao Tse-tung.

Transport

The government's policy in promoting all electric cars is not well thought out as the infrastructure does not exist country wide with regard to powering these vehicles. It would have been much wiser to promote hybrid cars which are self-charging and do not require a new infrastructure to maintain them on the roads. This should be immediately adopted.

The government is currently urging everyone to move to electric cars but yet it was reported on a radio station that 6,536 cars are in state ownership of which only 5 are electric vehicles EV.

We suggest that the state could lead the way by immediately changing to hybrid vehicles as no power points are required.

Kildare Environmental Awareness Group suggest that government policies should strongly include more carbon reduction regulations rather than carbon mitigation and carbon neutral policies.

In spite of all the renewable energy, predominately wind imposed on communities across the world CO₂ is still rising. This would indicate that current policies are not working and that CO₂ must be reduced and not mitigated. Reduction and mitigation are not the same thing.

We suggest that rural Ireland needs to get in line with many of the regions in France where local producers and small business which are run by local people and do not impact on their neighbours.

County Kildare is rich in heritage and history and has cut away bogs which could be developed into National Parks which would be a major amenity and asset to the population of Dublin and the surrounding counties. This would also create great sustainable local employment and increase tourism which would have a knock on positive effect.

Cut away bogs still act as carbon sinks and it is necessary for their continued conservation. To have a sensitively placed walkway system as part of a bog park amenity would be low impact and yet have high amenity value for the visitors.

The two images below clearly demonstrate which would be the better option for rural Kildare, its landscape and its dwellers.





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[Redacted]

On behalf of:

Kildare Environmental Awareness Group (KEAG)

2nd November 2017