

**From:** [REDACTED]  
**Sent:** 07 November 2017 16:46  
**To:** National Planning Framework  
**Cc:** Paula Byrne; liztbcollins@gmail.com  
**Subject:** Submission to Draft National Planning Framework 2040.

Title : Submission from Wind Aware Ireland.  
From : Henry Fingleton on behalf of Wind Aware Ireland.  
Date : Nov 7th 2017

Dear Sir/madam  
Please find below the submission to Draft National Planning Framework 2040.

This is a submission from Henry Fingleton, Chairperson of Wind Aware Ireland on behalf of Wind Aware Ireland.

## About Wind Aware

### Mission Statement

Wind Aware Ireland's aim is to reform the Irish Government's unsustainable wind energy policy. Our objective is to ensure that energy policies and developments fulfil the three pillars of sustainability; environmental, economic and social.

Our role is to hold policy makers to account to ensure that they act on evidence and to provide a counter balance to business influence on the political process.

Wind Aware Ireland have been involved in the energy debate in Ireland for the last 4 years. We have over 50 member groups from 22 counties who are impacted by wind turbines and are actively working to ensure that our current flawed energy policy is overhauled.

As a group we have developed a comprehensive understanding of the many issues related to climate change but in particular energy policy. We have made presentations to most political parties and to the last three Ministers for Energy. We have provided panelists to almost every radio and television debates on energy policy including several Prime Time's, Claire Byrne, Sean o Rourke etc.

## Summary

Ireland should not develop any more wind energy until there is a full analysis of the costs and benefits associated with such action. Such an analysis should be undertaken by ERSI and not by the SEAI or the DCENR who have demonstrated a alarming degree of incompetence and bias in implementing an effective co2 reduction strategy to date. Almost every new application for a wind farm is now ending up in the High Court. This is putting enormous stress on communities, is incredibly wasteful and is preventing Ireland from taking positive action to reduce our Co2 emissions.

## Main Body

To date, Ireland has focused primarily on all wind strategy as a means to de-carbonise our energy system. A rudimentary cost benefit analysis (CBA) to examine ways of decarbonising would have shown how deeply flawed this policy is.

An example :

Moneypoint power station, alone, produces 4.7 million tonnes of CO<sub>2</sub> annually by burning cheap imported coal, twice the amount our collective 1500 turbines save. So decommissioning this single coal plant would have saved twice the co2 that the collective 1500 turbines built to date are saving. The overall effect is that wind turbines spread over some of the most beautiful parts of Ireland save a paltry 3 to 4% of overall CO<sub>2</sub> emissions (See Appendix A) according to the SEAI, and possibly half of this according to other analysts.

If a CBA had been undertaken, it most likely that converting Moneypoint to sustainable biomass or clean gas would have emerged as a better option than wind, saving billions of euros, with better environmental outcomes. Likewise, upgrading our present stock of badly insulated homes may have been identified as another viable option. A Green minister in 2007 and a powerful lobby group meant that no CBA was carried out and none of these options properly explored before industrial wind was rolled out.

Because the wind doesn't always blow, wind turbines produce about 30% of their maximum potential output. Electricity is very difficult to store and to date, no feasible, cost effective, grid-scale storage technology has emerged suitable for Ireland. Consequently, intermittent electricity must always be backed up by conventional generation to provide power on demand - a basic expectation in Ireland. No conventional generation has been closed down because of wind.

The Public Spending Code mandates the appraisal and evaluation of any project with capital expenditure of over €20 million by means of CBA. Furthermore, projects and plans with environmental implications must be evaluated according to the European Strategic Environmental Assessment Directive, which provides a high level of protection to the environment as well as giving citizens the right to participate in environmental decisions. Both assessments require consideration of alternative methods of achieving the objective of CO<sub>2</sub> emission reduction, **yet neither has been carried out.**

The social impacts of wind energy in rural Ireland are enormous. The wind industry continues to operate a ruthless cloak and dagger, divide and conquer strategy. '*Community gain funds*' and payouts have resulted in disharmony and disagreement among neighbours, sometimes causing major family fallouts.

Turbine construction is governed by out-dated planning guidelines –described by Minister Naughten in Dáil Eireann as '*unfit for purpose*'- which allow them just 500m from homes, sometimes resulting in devastating consequences for families. The issue of noise from turbines recently made the headlines when Enercon Wind Farm Services Ireland Ltd. admitted liability for nuisance caused to seven families who abandoned their homes in 2011 due to noisy turbines. The families won their case after 6 years of legal challenges and court. The final compensation payment by Enercon Wind Farm Services is subject to a secrecy agreement but is anticipated to be in excess of €9 million. Other affected families will take similar court actions. and I know of one harrowing case that will be ignited soon.

No family should have to go out and spend several years and tens of thousands of Euros to save their homes and their family's health.

The Department of Communications, Climate Action and Environment has known since 2015 that the minimum setback distance of a turbine from a house, required to protect human health from noise, is far greater than that currently recommended. This information, which emerged from an Access to Environmental Information enquiry, was kept under departmental wraps and publication of updated planning guidelines promised by Minister Naughten within 6 months of this government's formation have been repeatedly postponed.

Currently wind turbines are reaching heights of 160m and heading for 250m. The devastation of our landscape is happening and accelerating, affecting communities forced to live in this industrialised landscape, tourists visiting Ireland and natural habitats.

Wind energy generation is heavily subsidised. The Public Service Obligation paid to the wind industry reached €300 million this year. The dispersed nature of wind farms and their intermittent output requires the electricity grid to be upgraded at an estimated cost of €3.5 billion, another unaccounted-for subsidy to the industry borne by consumers. In addition, the government forgoes revenue by allowing tax breaks to wind farm investors.

Minister Naughten continues to support a misguided and uncoded policy that delivers little for the environment at enormous cost to our economy and landscape, and which threatens the health and well being of rural dwellers upon whom these industrial developments are forced. Promises were made to rural Ireland before the last election; Minister Naughten and this government have broken them.

The continued failure to ask basic questions and the unwavering support for wind energy without even a rudimentary CBA is reminiscent of the politics that mismanaged the Irish economy into bankruptcy in 2008.

In a global context, Ireland is responsible for 1 in 800 tonnes of CO<sub>2</sub> emissions. This does not mitigate us from doing our share and being responsible international citizens but it does provide an important context. Any actions taken by Ireland to reduce CO<sub>2</sub> will have a negligible impact on international emissions.

Despite much rhetoric from sections within the environmental community, moving to renewable energy is technically very challenging and is certain to be very expensive.

In conclusion. A comprehensive Cost benefit Analysis must be carried out to ensure that any action are grounded

in evidence. This CBA must include all costs including social and environmental costs. Rural communities must have the 'right to say No' to infrastructure being imposed on them. The current popular idea that wind developers offer equity to communities must be abandoned. This misplaced top down approach will almost certainly cause enormous division in rural Ireland.

## Appendices

### Appendix A

SEAI. Energy in Ireland 1990 to 2014.

2015 [http://www.seai.ie/Publications/Statistics\\_Publications/Energy\\_in\\_Ireland/Energy-in-Ireland-1990-2014.pdf](http://www.seai.ie/Publications/Statistics_Publications/Energy_in_Ireland/Energy-in-Ireland-1990-2014.pdf)

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Renewable electricity provided 22.7% of electricity and reduced emission by an estimated 2.6 million tonnes. Wind constituted 18.2% of this 22.7% so was responsible for 2.08 million tonnes and a fuel import saving of €213 million

Fuel imports for 2014 were €5.7 billion or €5,700 million and total Co2 emitted from energy was 58 million tonnes. Therefore :

Fuel import saving as a result of wind was =  $\frac{€213m}{€5700m} = 3.7\%$ . Co2 saving from wind =  $\frac{2.08mt}{58} = 3.5\%$

Notes :

1 - The figures are estimates based on SEAI modelling. SEAI are not objective when it comes to wind. Two significant examinations (Wheatley and Udo) of SEAI's modelling have found that the benefits of wind are being significantly overstated. All these reports along with the only CBA (not a fully comprehensive one by Eleanor Denny) can be accessed directly from this page at Wind Aware Ireland

- <http://www.windawareireland.com/economic-issues/>

2 - Wind developers are expected to receive subsidies worth €269 million in 2017. -

[http:// www.irishtimes.com/business/energy-and-resources/government-feels-the-heat-as-cost-of-supporting-renewable-energy-jumps-1.2745319](http://www.irishtimes.com/business/energy-and-resources/government-feels-the-heat-as-cost-of-supporting-renewable-energy-jumps-1.2745319)

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Chairperson

Wind Aware Ireland

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