

S.J. O' Byrne MSc Env

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6th November 2017

The National Planning Framework 2040,

Dear Sir/Madame,

My name is S.J. O' Byrne and my academic and work background is in the area of Environmental Science, Weather and resource management. In this submission I would like to highlight some concerns I have regarding the draft plan in the area of energy and forestry. In this submission I will also include a number of relevant references to support my points

Taking the former first, I was disappointed to note that the draft plan seeks to perpetuate the costly and failing developer led energy policies of the last 20 years. What I mean by this is that it continues to prioritise the interests of large developers and speculators in the area of wind energy in particular over the interests and rights of rural communities, biodiversity protection, people suffering energy poverty and the need to effectively reduce GHG emissions in a cost effective way. Unfortunately such issues have more or less being completely ignored by successive governments and relevant state agencies/departments in favour of powerful vested interests in our energy sector. Notably in the vast largesse paid out to wind developers/speculators via the extremely generous wind subsidy scheme (REFIT) that guarantees grossly excessive payments for an intermittent energy source that rarely matches peak demand times. The cost of this approach(including the cost of grid infrastructure needed to serve this highly dispersed power source) is now running into hundreds of millions of euros (1). In spite of this the state has little to show for in terms of reducing GHG emissions from power generation or security of supply. The problem is that wind energy requires constant back up from conventional power plants to the extent that despite the vast spend on supporting wind developers/speculators in this country, emissions from power generation are actually on the rise with Moneypoint burning more coal than ever (2).

Another damaging spin-off from this failing approach is rising energy poverty(3) and rising energy costs for the wider economy(4). Since wind energy supports were brought in, in the early 2000's, Ireland has gone from below the EU average in terms of energy prices to now the 3rd most expensive in Europe (5)(6). Notably both Germany and Denmark who are now the only countries ahead of us in terms of power prices went down this excessive wind energy route an number of years before Ireland and have encountered the same issues(7). I'm increasingly

alarmed that no lessons appear to have been learned by this state with the so called energy regulator – the CER, continuing to rubber stamp steep near annual increases in the PSO levy to support ever more wind generation at the expense of both domestic and business users. Economists like Colum McCarthy have constantly pointed out the folly of this approach(8)(9). The lobbying power of these vested interests in our energy sector is also apparent in our planning laws with the ongoing refusal of this government to designate proper and safe set backs for housing, heritage and other sensitive areas in terms of large wind farms etc(10)(11). There is also the issue of the governments ongoing failure(which unfortunately is again apparent in this plan) to properly implement the terms of the Aarhus agreement in terms of meaningful public engagement when it comes to state energy policies and the planning implications that arise eg areas zoned for major wind energy projects, related pylon projects like gridwest etc. This has led to many community led campaigns throughout Ireland against large invasive wind farm plans with a number of cases of wind farm permissions being overturned in the courts . In addition the continuing failure to carry out a credible SEA on the current NREAP has led to a number of cases being referred to the ECJ(12).

Similar issues are likely to arise with large scale solar farm which again have a similar record in other eu countries in terms of excessive costs and little or no reductions in GHG emissions due to solar obvious limitations in matching output with peak demand times like the hours of darkness, winter period etc.(13)(14)

Finally I wish to highlight flaws in the governments approach to forestry in relation to afforestation and GHG emissions. The policy currently is to concentrate forestry on poorer and peaty soils using non-native spruce monocultures. This is damaging to the environment in several areas. Firstly to afforest such areas(typically upland and lowland bogs) requires extensive drainage to allow planting, forest roads etc. This seriously damages the bogs ability to store CO2 and does even more damage by releasing large amounts of methane from such areas(which is a much more powerful GHG compared to CO2). Other damaging impacts include loss of biodiversity from such habitats since closed canopy industrial conifer plantation support very few native species compared to natural upland habitats like heathlands, bogs, rough grasslands etc.. Also acidic run-off from such areas damages important upland watersheds that act as vital nurseries for game fish like Salmon etc. not to mention important local water supplies for business and domestic needs. Ireland does indeed need more woodland – but it should be of the native, sustainable variety that achieves the goals of enhancing the Irish environment at every level.

Yours sincerely,

S.J. O' Byrne

(1) <http://www.windawareireland.com/cheap-wind-energy/>

- (2) <http://www.irishexaminer.com/ireland/greenhouse-gas-emissions-rise-in-key-sectors-393935.html>
- (3) <https://www.independent.ie/business/personal-finance/electricity-bills-to-rise-as-green-levy-up-30pc-35979119.html>
- (4) <http://www.eastcorkjournal.ie/green-energy-could-push-domestic-and-business-electricity-bills-through-the-roof/>
- (5) <https://gailtheactuary.files.wordpress.com/2016/08/euan-mearns-europe-electric-price.png>
- (6) file:///C:/Users/eidwgo/Downloads/Document-88-25-10-10%20(1).pdf

- (7) <http://notrickszone.com/2017/05/19/germanys-energiewende-an-economic-social-and-ecological-disaster-writes-top-german-socialist/#sthash.fNZUwJaW.MZAjm1OI.dpbs>

- (8) <https://www.youtube.com/watch?v=BdLV0qSaneo>

- (9) <https://www.farmersjournal.ie/colm-mccarthy-what-s-the-point-of-more-windfarms-299198>
- (10) <http://www.leinsterexpress.ie/news/local-news/273329/laois-td-brian-stanley-s-wind-turbine-bill-defeated-in-the-dail.html>
- (11) <https://cawtdonegal.wordpress.com/tag/iwea/>
- (12) <https://www.irishtimes.com/news/crime-and-law/courts/supreme-court/supreme-court-refers-tipperary-windfarm-decision-to-europe-1.2987915>

- (13) <https://www.theguardian.com/environment/2016/apr/08/solar-installation-in-british-homes-falls-by-three-quarters-after-subsidy-cuts>

- (14) <https://notalotofpeopleknowthat.wordpress.com/2017/11/01/new-solar-developments-dry-up/>