



MEATH WIND INFORMATION GROUP
- A COMMUNITY CONCERN.

Submission

On

Draft National Planning Framework 2040

To

Department of Housing, Planning and Local Government

Meath Wind Information Group comprises of concerned residents living in the North Meath area who have formed a group for the purpose of educating and informing ourselves and the wider community regarding the large scale industrial windfarm which is proposed for our area.

Our concerns regarding the erection of industrial wind turbines rest on three pillars:

- Our Health
- Our Wealth
- Our Environment

Population and Housing

MWIG notes the framework's proposal for regeneration of rural towns and communities. If the plan is to focus these areas as suitable for addressing future housing needs, then the areas themselves and existing housing stock will need to be protected. It is MWIG's position, on the basis of international best practice, that areas of human settlement and habitation are not suitable areas for industrial windfarms.

MWIG therefore proposes that a key objective for rural towns and villages should be an exclusion zone of 5 kilometre radius preventing industrial wind turbines from being erected and therefore from impacting negatively on the homes of the inhabitants.

Further MWIG therefore proposes that, in-line with international best practice (Bavaria, Germany for example) a key objective for existing rural housing settlements should be a set-back distance for turbines of 10 times the rotor height. This is to prevent industrial wind turbines from being erected and impacting negatively on the homes of the inhabitants.

Economic Development, Enterprise and Employment

Eddie O'Connor, Mainstream Renewable Energy, has publicly admitted that there will only ever be any substantive jobs in wind energy in Ireland if a factory is built to manufacture turbines. Siemens have announced they are

building one in the UK. There will not be any such factory built in Ireland – EVER.

Bord Na Mona figures tell us that 1.5 jobs per 1 MW are created in wind energy projects during the construction phase. Once the turbines are up, the long term job numbers drop to 5% of those required in a windfarm's construction.

A Fáilte Ireland survey suggests a 25% drop in tourist numbers to Newgrange should a wind farm be developed in the North Meath area. This would mean a loss of 15 full time jobs.

The Irish Thoroughbred Breeders Association has publicly come out against Wind farms. The equine industry provides 3,000 direct and indirect jobs in Meath. How many will be lost when the Stud farms move elsewhere should wind farms be developed in Meath?

MWIG therefore proposes that a key objective for the protection of existing employment should be an exclusion zone of 20 kilometre radius preventing industrial wind turbines from being erected and therefore from impacting negatively on places of equine employment or tourism significance.

(Note: The 20 km figure is taken from the recommended exclusion zone as defined by UNESCO for the protection of World Heritage Sites.)

Tourism

World Heritage Sites in Meath.

MWIG would direct the Minister to the submissions made by the Dept. of Arts, Heritage & Gaeltacht to UNESCO in 2010. Both submissions were accepted and listed on the tentative list for World Heritage Status. The first listing is of relevance to Kells, Co. Meath. The second listing is of relevance to Tara, Co. Meath. It can be seen from the department's expert submission, that the site at Kells is of equivalent universal importance of international sites of significance including:

Skellig Michael: Ireland, Saint Catherine, Sinai: Egypt and the Early Christian Necropolis of Pécs: Hungary

The department's expert submission regarding the Royal sites further goes on to state:

*"All of the Royal Sites form **part of larger archaeological landscapes** characterised by a large concentration of ritual monuments."*

MWIG would point out that Meath has been described in national newspapers as "Ireland's Valley of the Kings" – Billy Keane, Irish Independent.

The entire county is an archaeological landscape to whom tourists come to experience and enjoy.

MWIG would respectfully submit to the Minister that Meath County Council should be encouraged and supported in actively pursuing the achievement of world heritage status for these two listings. This would bring about 3 world heritage sites within the county. To put in context what this would mean – Bru na Boinne receives approximately 240,000 visitors per annum. Failte Ireland report that this number could be significantly increased, were there to be further sites within the county to visit. Currently, Newgrange is seen as a day trip from Dublin. By retaining visitors in the county overnight, the local economy would be greatly boosted. The nett result of all this would be money for the protection and investment in all other heritage areas of interest in County Meath.

Infrastructure

Renewable Energy

There is no denying the need to migrate our dependency on fossil fuels over to renewable energy sources. Fossil fuels will one day, run out. The timeframe needed for such transition is open to debate. That said, the state has signed up to aggressive targets regarding carbon emission levels in the EU 20-20-20 agreement. The worthiness of this agreement is debatable, but we are where we are. Where we are, is stuck with a commitment to achieve the target for energy generation, using on-shore wind energy only (Ireland Progress report to the EU commission 2013). MWIG submits that this national policy is anti-

competitive, uneconomic, inefficient and scandalously to the detriment of the Irish electricity bill-payer. We should not allow an “all our eggs in one basket approach”.

Further, given the targets that have been set, the land footprint required to meet these targets using onshore wind turbines would render huge tracts of the rural landscape sterilised to another other development type.

In order to play its part in the national strategy of migration to renewable energies, MWIG submits that National Planning Framework should have an open green-energy strategy which embraces all forms of renewable energies when properly situated. These include, solar, geo-thermal, bio-mass and wind. We should focus future wind energy development off shore, as per international best practice – Denmark, UK, Germany, France, etc. The cost per Mwh of offshore wind energy is now cheaper in Denmark than it is for onshore wind energy in Ireland. It is time to embrace offshore wind power and let Ireland be a world leader in this regard.

40% of Ireland’s population lives within 5km of the coast. The bulk of industrial energy usage is within 40km of the coast. It makes sense therefore, to locate our energy generation as close as possible to end user.

MWIG therefore proposes that a key objective for the reversal of climate change and to achieve Irelands renewable energy targets are to henceforth place wind energy developments offshore in the first instance.

Landscape, Heritage and Green Infrastructure

North County Meath Heritage Landscape.

Under the European Landscape Convention a landscape has been defined as ***“an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors”***. MWIG is pleased to note that the National Landscape Strategy has defined, as one of its six core

objectives, a desire to “Strengthen Public Participation” as required under article 5 (c) of the ELC. It is the opinion of MWIG that the public focus, should weigh more heavily on the residents of the particular landscape in question, rather than the wider general public. By focusing on the citizens of an area, their opinions, ideas, concerns, history and experience are taken into consideration at the very first stage. This will reduce greatly any reluctance to change as those most directly affected are included from the start.

Proper planning for use of a landscape is vital for this country to avoid the mistakes of the past. Ghost estates litter the rural countryside. Blocks of apartments have been allowed along SAC’s and protected natural areas (for example, Navan Co. Meath). Large scale industrial buildings have been erected in rural areas. In the planning stages of any industrial development, MWIG advises that independent trained experts in the area of landscape architecture must be consulted and used to advise on all possible means of reducing the impact on the landscape and its residents. Developments of “Strategic Infrastructure” as defined under the 2006 Act must be assessed in this way. This is of vital importance where developments will show no direct, tangible benefits for the community inhabitants of the landscape affected. For example, take a wind farm developed for the export market. MWIG would propose that the use of a landscape for such a development does not meet the definition of a landscape under the European Landscape Convention. There will be no interaction between a wind farm and the local inhabitants. Instead, the interaction and benefits will be directly enjoyed by those in the foreign market to whom the generated energy is being exported.

Ireland has a rich historical past which is the envy of the developed world. Tourists come in large numbers to this country because of our heritage and culture, both of which are preserved in our landscape character. MWIG recognises the ongoing need for sustainable, sympathetic development in our countryside. However, we cannot stress enough, our firm belief that such development should not be at the cost or detriment to reminders of our past. People come to Ireland because they can see, touch and feel the historical past. Part of this experience is the visual impact of our landscape. Historical developments have helped shape the character of Ireland’s landscape in conjunction with the natural features. The National Planning Framework must protect the character of the landscape with particular focus on the visual character of our heritage landscapes.

On behalf of Meath Wind Information Group

Yours sincerely

Seán Ryan

November 9th 2017.