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NPF Submissions,  
November 9, 2017  
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**Re: Ireland 2040 Our Plan National Planning Framework**

To Whom it May Concern,

I welcome the opportunity to offer this brief comment on the draft National Planning Framework 2040.

The draft as it stands is filled with laudable goals – sustainability, economic growth, urban renewal, rural development, connectivity, the self-reliance of a circular economy, enhanced quality of life, etc. The draft NPF's focus on Climate Change – a factor that many rightly view as the most significant issue facing our world today – is particularly welcome.

It will require great skill and forethought, however, to achieve these goals – some of which can be at odds with one another.

Of concern to me are some possible contradictions in policy toward the energy sector. Page 19 of the current draft stresses the importance of influencing societal behaviour toward sustainable outcomes:

*It's clear that in the years ahead, more choices will be needed to accommodate changes in our society, in response to greater diversity, increased numbers of older people, new ways of working and communicating, meeting competitiveness challenges and in addressing climate change. It will be important for future choices to be genuine and based on trade-offs that can influence behaviour towards more sustainable outcomes.*

Yet, I note with concern some of the conclusions about the Renewable Energy also made in the draft:

*In meeting the challenge of transitioning to a low carbon economy, the location of future national renewable energy generation will, for the most part, need to be accommodated on large tracts of land that are located in a rural setting [draft, p. 71]*

*New energy systems and transmission grids will be necessary for a more distributed, renewables-focused energy generation system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy to the major sources of demand. [draft, p.124]*

Which is repeated as a National Strategic Outcome:

*New energy systems and transmission grids will be necessary for a more distributed, more renewables focused energy generation system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy to the major sources of demand [draft, p. 138]*

The consequences implied by these assumptions are that "large" renewable energy projects – in particular wind power developments – will be accommodated on green field sites in rural communities and will be connected through "new energy systems and transmission grids".

To include such assumptions in a planning document that purports to be concerned with "genuine" choice seems premature.

As the NPF's drafters will be aware there is widespread public opposition to the government's reliance on wind energy as its principal means of meeting Ireland's renewables commitment. The public opposition to wind was further fuelled by Eirgrid's plans to "upgrade" the existing grid without regard to the consequences to rural communities up and down the country.

The many thousands who voiced their opposition to the wind power and grid development plans would be devastated to read the NPF's assumptions that the rollout of large scale renewable projects and a massive extension of the grid is considered by national planning authorities to be a *foregone conclusion* as they look forward to 2040.

Where then is "genuine choice" or an attempt to "influence behaviour toward more sustainable outcomes"?

The conversion of the existing Moneypoint power station is an example of one such "genuine choice" that is not even given consideration in the document.

The NPPF objective "*7 Sustainable Self Reliance*", particularly the progress toward a low carbon economy would be better achieved through the conversion of Moneypoint to biomass. This scenario has been tested by the ESB and shown to work. The Conversion of Moneypoint has the advantage of using the existing site. This is an important policy option and consideration of reuse and conversion of existing energy infrastructure sites or similar brownfield sites should be considered as a first option in any renewable energy development strategy. This should be identified as a sustainable objective for inclusion in the National Capital Investment Plan.

This project should be included as an alternative means of achieving a low carbon economy, which can support a coherent and focused investment in renewable energy infrastructure in a single location avoiding the need for significant investment in grid infrastructure and avoiding hap hazard location of wind turbines in sensitive rural landscapes.

I would ask the drafters to respect the oft-expressed concerns of a significant portion of the Irish people, many of whom live in the rural communities that will be most affected by such power and grid developments. Those who live in the Irish countryside have long been the most ardent protectors of our natural and built heritage, our landscapes and wildlife. Recently, their often lifelong commitments to these issues has been denigrated as "nimbyism" and "anti-green". This issue has caused painful division in communities which should not now be perpetuated by a planning document that ignores their voices.

Yours sincerely

