

C a p p o q u i n H o u s e
C a p p o q u i n , C o W a t e r f o r d .



16 November 2017

NPF Submissions,
Forward Planning Section,
Department of Housing, Planning,
Community and Local Government,
Custom House,
Dublin D01 W6X0
npf@housing.gov.ie

Re: Ireland 2040 National Planning Framework submission

We hereby make submissions as follows:

1. Stop further development of wind farms
 - Over 204 local community groups from across Ireland have come together to highlight their direct opposition to wind farm development. The issue of wind farm development has divided communities across Ireland in a socially destructive manner.
 - There is widespread public opposition to a further roll out of wind farms as the main basis of this policy as they generate particular and specific environmental implications for communities, which are no longer acceptable and there is little evidence of concern for impacts on human beings.
 - The capacity of the country to accommodate any new wind energy development is compromised by existing over development within a limited grid infrastructure and limited energy market. The reduction in carbon emissions from furtremoval of all subsidies
 - Further wind energy generation are limited as the country continues to burn coal and peat in power stations for the times when the wind doesn't blow and take up the slack in wind inconsistencies.

2. Convert Moneypoint and promote biomas farming
 - 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. 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 haphazard location of wind turbines in sensitive rural landscapes. The conversion of Moneypoint would also address the issue of intermittent supply posed by overreliance on wind energy.
- The conversion of Moneypoint to biomass would support National Policy objective 56 to reduce carbon footprint and would further support national policy objective 57 to support renewable energy generation at appropriate locations within the built and natural environment.
- The National Planning Policy Framework focuses on the three pillars of sustainability, security of supply and competitiveness . Moneypoint conversion supports all three pillars renewal of a brownfield site, would provide a secure continuous supply and is economically competitive and would support biomass farming.
- Biomass farming would offer alternative, stable and secure income to farmers which will be needed when CAP subsidies run out and Ireland finally realises that it can no longer compete on world markets for commodity crops.
- The dairy industry could well be able to maintain its grass based competitive advantage but will face increasing demands for emission controls. The biomass industry could help with the processing of cattle waste and meeting emission targets.

Yours sincerely

Charles Keane