

Grid Link Action Group,
Narraghmore,
Co Kildare

7th March 2017,

The National Planning Framework 2040,

Dear Sir/ Madam,

We are a community group which actively engaged with planning issues around electricity transmission infrastructure. From our experience, we must state the lack of transparency in the planning process and the approach taken by bodies such as Eirgrid in their engagement with local communities left much to be desired as to how much public consultation is undertaken, and how much is purely undertaken as an exercise in ensuring that minimum levels of engagement are evidenced.

From our experience, little cognisance has been given to communities and the potential impact of large scale projects on communities and their ability to develop their natural and cultural heritage in the future, particularly in an environment where most employment opportunities will be concentrated closer to the larger urbanisations.

Looking at where large sources of electricity supply will be required; an inordinate amount is being dedicated to data centres in close proximity to Dublin and close to the new fibre optic cables from the West of Ireland. While we see the benefits of ensuring Ireland is at the cutting edge of technological change, the facilitation of moving bulk electricity from points A to B should not look to be effected in the cheapest manner possible, to the detriment of rural communities.

There is a further argument to be considered with regard to the Data Centres, and that is the climate in Ireland is typically in a narrow range thus the significant costs associated with operating the cooling systems in these data centres is much lower than it might be in other geographic locations. The fact as an economy when we are considering the best uses of our available resources, the question must be asked is whether dedicating a significant proportion of our current and future energy generation at a subsidised cost is in the broader public interest, particularly where there is a significant financial benefit for a relatively small number of Multi-nationals which benefit from this arrangement.

It could be argued that the current socialisation of the cost of building electricity transmission Infrastructure (ie all the ordinary Electricity users have to pay for the cost of development on their electricity bills), is in effect a subsidy for the large users of electricity, primarily multi-national owners of Data Centres

This should be taken into account if further large scale developments are to be considered and some of the cost required to develop the infrastructure is passed back to these end users. This in turn would allow more flexibility in developing a more environmentally friendly introduction of electricity transmission infrastructure, rather than the system that is lowest cost with greatest impact on our landscape, built and natural heritage, our health, our children and our biodiversity.

For rural parts of Ireland, agriculture, the equine industry and tourism are amongst the most important employers, and have the potential to allow for the reinvigoration for the many parts of Ireland not going to be, which cannot expect to benefit from the further development of urban areas.

The minister in his foreword recognises that one solution will not fit all regions, as an example on a local basis this is most telling in the context of Kildare and particularly South Kildare where there are significant unemployment black spots, and it is unlikely that there will be significant industries attracted to the area, and local communities will need to be more self-reliant in encouraging and developing policies and strategies that will allow these communities to thrive. We would believe these issues are replicated in many midland counties, which were by passed by the economic boom prior to 2008, and have not participated in the economic recovery since.

In order to avoid an industrialised landscape with large wind farms, solar farms, and the associated transmission infrastructure, greater thought needs to be given to driving energy efficiency in buildings both new and old and incentives provided to encourage retrofitting of existing buildings to make them more energy efficient.

Unoccupied buildings in town and village centres should be looked at to see if they can be reintroduced into the housing market to meet the growing need, there are benefits here in maximising the use of existing infrastructure, and helping the economic redevelopment of these towns and villages. At the same time, they will also meet a social need.

In many of our recent discussions with elected representatives and officials in various government departments, the question of public interest has been given as the reason why infrastructure needs to be built. We would argue that the starting point should always be to look to see if existing infrastructure can be upgraded. Secondly, in our long-term plans how do ensure to facilitate further infrastructure to be integrated into upgrading or construction of say new roads. Thirdly, the argument of public interest needs to be carefully balanced as to who is actually the end users, as the indiscriminate use of the term, only serves to undermine the concept of the public good and public interest.

About green energy, how can emerging trends in solar be integrated into new buildings particularly industrial and office buildings, what will the impact of the possible development of batteries to store energy.

With regard to the points above we believe they refer to the overall framework but in particular:

5.3 Re Energising Ireland

5.4 Heritage and Landscape

5.5 Green Infrastructure and Biodiversity

6.1 Setting the Bar

Yours sincerely,

Maura Leigh,

Chairperson, Grid Link Action Group, Narragahmore, Co Kildare.



