



31/03/2017

NPF Submissions
Forward Planning Section
Department of Housing, Planning, Community and Local Government
Custom House
Dublin D01 W6X0

Ref: Consultation on “Ireland 2040 Our Plan – Issues and Choices”

To whom it concerns,

I refer to my email on 16th March 2017 advising that I would be submitting a written response to the consultation on “Ireland 2040 Our Plan – Issues and Choices” by the extended deadline of 31st March 2017. This letter is my written response as per my undertaking.

I want to thank the Minister of the Department of Housing, Planning, Community and Local Government and his team for the opportunity to submit comments in relation to the “Ireland 2040 Our Plan” consultation. I believe for too long, despite the Aarhus convention, the voice of the “common man” has not had the appropriate opportunity to be heard in relation to planning and development in Ireland. I sincerely hope this consultation is an indication that this lack of engagement is changing in Ireland from now onwards such that the people of Ireland’s genuine concerns and issues can be properly aired, are listened to, and positive actions taken as a result. As mentioned in the Ministers foreword; “ We have a unique and exciting opportunity now to plan for a better future for all” but to achieve this we must listen to all, especially the people most affected by developments in their localities and communities, and we must learn from our mistakes in the past. The comments made below are intended in the main to address the six questions raised at the end of Section 5 (page 46) of the consultation paper titled “Ireland’s unique Environment – sustainability”.

(1) The people most affected by developments have the least say:

The reality is today when a development is being proposed, the views of the local people most affected by the development have the least influence on the development, despite their legitimate and genuine fears and concerns. This has been especially true in relation to on-shore wind farm developments in Ireland for the last 10 years or more, but this must change if we are to truly “plan for a better future for all”. The process appears to be that once the planning guidelines set centrally are satisfied, local County Councils and even an Bord Pleanala feel powerless to stop developments proceeding despite public opposition for the many legitimate reasons typically outlined in relation to same. This cannot be a fair, reasonable or logical approach to such critical matters given the impact such developments have on communities and the landscape, and the length of time people will have to live with such developments in their localities.

(2) Locations and people’s opinions differ:

In the consultation the Department recognise that “some area of the country are better suited to the generation of renewable energy and differing types of renewable energy infrastructure”. It also recognises that; “If we want our country to be the best it can be, we must ensure that development and services are located where all of our people can best be served. In other words, we must ensure

that that right development can take place in the right places, at the right time". The reality in Ireland today is that this is not happening. Today on-shore wind developments have typically been located where there are the least amount of people to object to such developments regardless of the impact on the environment, community, tourism or heritage. Developments are being simply foisted on these typically rural people where their opinion is neither being sought nor listened to. The hard facts in relation to where these developments have taken place clearly outline the aforementioned. If Ireland truly wants to locate developments "where all of our people are best served" it is imperative to seek local people's views, listen to their concerns and wishes, and act appropriately thereafter taking these concerns and wishes into account, regardless of how small the number of people affected is.

While many people do object to on-shore wind developments, many of these still support Ireland's drive to a more sustainable energy future and a reduced dependency on fossil fuels including in electricity generation. Given this, alternative ways of achieving Ireland's climate change obligations must be found other than on-shore wind. Advances in technology will create new opportunities for Ireland allowing it to have a diverse array of renewable generation from different technologies and sources which is a prudent vision for Ireland and moves away from to a current situation of Ireland being totally reliant on on-shore wind generation to combat climate change obligations. Off-shore wind generation and solar offer clear alternatives, and in the future with advances in technology generation from wave and tidal could also play their part.

(3) **Effective Development**

The Minister refers to a desire to "...replace the concept of balanced regional development with the idea of effective regional development". This is eminently logical and the application of this logic is long overdue. There cannot be a regime where developments take place in suboptimal locations simply because of a view to spread developments geographically around Ireland. Locating industrial on-shore wind farm developments in densely populated areas is illogical given their known negative impacts on communities and peoples their health and well-being, but in particular given the turbines can be placed where their impacts are not felt by local residents, whether this be in a very remote location, into another county, or moved off shore.

It is contended that "effective" development inherently must include a requirement for "efficient" development. On-Shore wind development costs have reduced significantly in the last 10 years (especially in the last 3) but Ireland has not adjusted its REFIT tariff subsidy regime for same. This is illogical, and blatantly disregards the responsibility entrusted by the people of Ireland in their elected government and their departments to ensure renewable developments are carried out in the least cost method possible so as to lower the overall cost burden of achieving Ireland's climate change obligations. While many other countries in the world have scrapped their subsidies for proven renewable generation technologies like wind, or set in train a process to scrap them, Ireland has not taken such a step as yet. Not adjusting the REFIT subsidy not just makes no economic sense for Ireland and its people but also sends totally incorrect signals to renewable generation developers.

The subsidies being paid to generators in Ireland totalled €301.9m under the latest set of PSO regime figures. Through this Ireland is subsidising wind generation at a cost of €109,000 per MW per year, where many countries have either no subsidy or have a subsidy that is a fraction of this amount. These subsidy agreements are for 15 years and at this subsidy rate, given the current installed wind capacity of 2,783MW the cost to Ireland would be €4.53bn. This subsidy is on top of revenues received from the market reflecting what the markets view is of the real value of this renewable energy generated. Ireland needs to stop signing these 15 year agreements immediately and find a more cost effective way to meet its climate change obligations.

(4) The adverse effects on locals outweigh the “touted” benefits from on-shore wind farms:

There is a great deal of misleading marketing being employed by renewable energy developers in Ireland today about the benefits of renewable energy developments to the local community, and these misleading statements need to be silenced. There is a hugely disproportionate allocation of the benefits from on-shore wind farm developments in Ireland. The reality is that there is no sustainable benefit (economic or otherwise) to the local economy where wind farm developments take place. Indeed it is strongly argued that the cumulative negative effects of such developments materially outweigh the touted potential benefits. The benefits largely relate to one off “hand outs” from developers to local communities in order to buy their agreement to allow developments, in addition to the payment of rates to local county councils as would be the norm for any development. There is no on-going local employment of any materiality. Councillors are conflicted unfortunately in the Ireland of today by having their budgets cut since the recession given the reduced central government funding, and thus when one of these on-shore wind farm developments applies to them given the on-going rates income, they are incentivised to approve the development despite any personal reservations they may have themselves or from people in the locality. Councillors should not be conflicted like this in so critical a decision making process.

The huge proportion of the benefits as outlined in point (3) above sit with the wind farm developers due to the highly favourable subsidies granted to them. Local residents are left with adverse effects such as increased noise levels, wind turbine syndrome, flicker, constant safety concerns in relation to turbine collapse as has happened too often, low frequency noise causing sleep deprivation, property that has lost considerable value or indeed no one wants to buy, a landscape that has lost its natural appearance and beauty, sterilised land that cannot be built on, to name a few. Younger and older people are typically more prone to the negative effects of wind turbines given their heightened sensitivity to low level sounds or infrasound. This lack of balance must be righted in Ireland in the future and this consultation is a perfect place to start.

The majority of the negative health impacts on people from wind farm developments can be addressed by increasing the distance such developments must be located away from residential dwellings. Ireland currently allows wind turbines to be located 500m (or less) from the wall of a residential dwelling which is one of the shortest distances in the developed world. Many countries around the world have increased this distance in line with the increase in the height and size of wind turbines. Today many countries set distances of 10 times tip height, or set minimum distances from 1km to 10km regardless of tip height.

(5) Development of renewable energy sources other than on-shore wind should be encouraged:

Ireland has a target to achieve 16% of total final consumption from renewable energy in 2020. Ireland has decided to achieve this target with contributions of 40% from renewable energy in electricity (RES-E), 10% from renewable energy from transport (RES-T) and 12% from renewable energy from heat and cooling (RES-H). While Ireland is well on the way to achieving its 40% target for electricity by 2020 it has achieved very little in relation to transport and heat, and urgent action is needed on this.

The renewable energy developments in Ireland in the last 10 years have been almost exclusively from on-shore wind farms. This is despite the fact that this form of renewable energy has the greatest negative impact on the landscape, environment, and health of people and the local communities in which they are located. As Minister Coveney acknowledged on 10th March 2017 as reported in The Irish Examiner newspaper “I think we are reaching a point where communities on land are struggling to accept many more large-scale windfarms and many of you will be in communities that would be very resistant to [windfarm] planning applications.” He further

acknowledged that “Offshore wind energy is moving to being cost competitive” and the reality is that the latest offshore wind farms in Europe to win at auction to be built without subsidy are at a cost of over 20% cheaper than the current subsidy rate used in Ireland for on-shore wind developments. Ireland must move any future wind turbines off shore and stop devastating local communities and the people living in them by large scale industrialisation of these areas beyond recognition with these large scale wind farm developments where today the turbines being erected are taller than the Spire in Dublin but have rotors creating a shape larger than a jumbo jet.

In terms other attractive renewable propositions solar energy costs have decreased even more over the last 3 years than either on-shore wind or off-shore wind and are now at a similar level to on-shore wind. This technology does not have the same unsightly impact on our beautiful landscape, nor the same negative impacts on property prices, health, or nuisance from flicker and/or noise. We await the government decision in terms of a subsidy for this form of renewable energy but given the experience in other countries NO SUBSIDY IS REQUIRED as it is cheaper than the subsidy Ireland currently gives to on-shore wind farms. Solar would give an improved diversification in terms of renewable energy to Ireland and for this, and the inherent reduce negative health implications, solar farms should be prioritised ahead of on-shore wind farms.

Other renewable energy generation sources include wave and tidal but the technology for these is not at a stage yet where these can be commercially viable but this is expected to change with time. Given Ireland's unique position in Europe in terms of its potential from wave and tidal, there is a case to argue for subsidies to encourage the R&D required to advance these technologies to commercially viable solutions.

(6) Development challenges related to Agriculture and Transport have still be to be:

While some years ago the largest cause of carbon emissions in Ireland was electricity generation this has changed dramatically with the introduction of renewable generation in Ireland. In 2015 the largest contributor to green house gas emissions in Ireland was Agriculture, while the second largest was Transport (despite the RES-T target noted in point (5) above which Ireland committed to). Despite this the government in Ireland has done little if anything to address these areas of pollution of the people of Ireland. The utilisation of farm waste and slurry to produce biogas which is then input into compressed gas vehicles at suitably equipped filling stations outlines a clear complete mechanism to improve the emissions from both agriculture and transport. While pilot projects have successfully received funding, more needs to be done. Suitable infrastructure to allow compressed gas vehicles (including Compressed Natural Gas (CNG) vehicles) must be accommodated in our planning process, as well as the accommodation of planning for the slurry/farm waste processing facilities subject to they complying with strict environmental regulations.

The growth in renewable electricity generation in Ireland will create a situation where such generation will be generating when there is insufficient demand for the power it is creating. Electric Vehicles charging at such times create an obvious solution to this dilemma, where people are incentivised through lower night rate electricity to charge their EV vehicles overnight for example when there is lower system demand. The roll out of EV charging facilities to localities and homes to facilitate this activity needs to be given careful consideration in the whole planning process to ensure there are no barriers to optimising this activity.

Conclusion:

The Minister has acknowledged that “*The fact is that we have not always grasped the opportunity that good forward planning can give*” and it is clear he hopes this consultation process will give a better opportunity to get things right than in the past, as long as peoples comments are given the

careful consideration they deserve, and the points they make carefully analysed to ensure they are fully understood. The Minister has also stated that *“If we continue to do things as we have over the past twenty years... [we will]... compound many of the quality of life difficulties we currently face”*, and we will not *“deliver the national vision and goals we all share, such as improved living standards, a desire for people to live in safe, vibrant communities and to experience life-long health and well-being”*. On-shore wind developments in particular have devastated local communities and people in areas close to such developments do not have improved living standards, do not live in a safe environment, and do not experience life-long health and well-being. In fact they experience reduced living standards, live in fear of catastrophic failure of turbines, and have lives where they constantly experience negative health implications from many of the potential effects of such turbines. This must stop now. No more people in Ireland should have these industrial developments inflicted on them. There is no logical, economic, social, or environmental reason to inflict on-shore developments on people in Ireland any more. There are far better alternatives to this which do not devastate local communities and these need to be given priority while on-shore wind developments must stop now.

The Ministers has also spoken about the sense people in Ireland have of belonging to both community and place, and our values and strengths as community builders and the value we place on social justice and fair play. The reality is on-shore developments have dramatically fractured many local communities in Ireland given the many negative impacts of such wind turbine developments on local people. It has split families, neighbours, friends and parishes. Why has this been allowed to happen? There is no need for this as there are alternatives. Let us learn from our mistakes and change for the better.

In addition the Minister has stated that *“Ireland’s landscape offers a wealth of natural and cultural assets which support our quality of life and our visitor economy. Failure to protect our landscape, seascapes and our cultural heritage will damage the attractiveness of Ireland as a place to live, visit and work.”* Onshore wind developments totally change the landscape in which we live. They change it beyond recognition. As a country we are failing to preserve the uniqueness that is Ireland in the hearts and minds of the millions who come to Ireland to visit, to live, to return home. We are adversely affecting Ireland’s landscape forever and for what purpose? It cannot be for Climate change targets given that these can be met with other technologies that have far less adverse impacts on our unique and beautiful landscape. We need to act now to preserve what we have thus far left untouched before we ruin much more of Ireland’s landscape and the quality of the lives of the people living close to such developments.

Finally Ireland needs to stop any further on-shore wind farm development. Such developments have immensely negative impacts on families and communities, in terms of negative economic, social, and health impacts to name a few. There are better alternatives for Ireland to use to achieve its climate change aspirations and targets such as solar farms and off-shore wind farms which are cheaper than the current REFIT scheme in Ireland for on-shore wind, and yet these alternatives have none of the same negative health and social impacts. Any on-shore wind farm which is already in the planning process should not be allowed to proceed without the government increasing the distance such developments must be away from local residential dwellings. At a minimum such developments should be 10 times tip height away from residential dwellings, or 1.5km, whichever is the greater. This is in line with informed, international, best practice. Such a move is essential for the health and well-being of the people in rural Ireland near any such onshore wind farm development.

Regards
Niamh Byrne