

## Observation Offaly County Development Plan 2021-2027

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In this observation I highlight issues in regards to the wind energy strategy and make some comments on the Strategies which inform the County Development Plan.

### 1 County Wind Energy Strategy

#### 1.1 *Eastern and Midland Regional Spatial and Economic Strategy 2019-2031*<sup>1</sup>

Regional Policy Objective 7.35 of the RSES states that Eastern Midland Regional Authority shall, in conjunction with local authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. It is stated that Strategic Energy Zones for the Region will ensure all environmental constraints are addressed in the analysis and that a regional landscape strategy could be developed to support delivery of projects within the **Strategic Energy Zones**.

The Strategy acknowledges that Bord Na Mónas Strategic Framework for the Future Use of Peatlands indicates that **their cutaway bogs may be suitable for renewable energy** as long term alternative uses of these sites.

I could not find any Strategic Energy Zones. Where are those zones located in Offaly, or are these the cutaway bogs of Bord Na Móna according to the above strategy?

If so, why are alternative sites indicated as suitable for wind energy?

#### 1.2 *Wind energy compared to solar*

I note that Offaly adheres to the Climate Action Plan 1990's key objective:

*“Increase reliance on renewables from 30% to 70% adding up to 8.2 GW of renewable onshore wind energy capacity with some of this delivered **by private contracts via corporate** power purchase agreements;”*

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1 [https://emra.ie/dubh/wp-content/uploads/2020/05/EMRA\\_RSES\\_1.4.5web.pdf](https://emra.ie/dubh/wp-content/uploads/2020/05/EMRA_RSES_1.4.5web.pdf)

This has inherent problems in it:

1. It has an over reliance on wind power, solar doesn't seem to get the same focus
2. it has the possibility to let corporate entities to profit, while the negatives have to be born by the public (locals and PSO levies, recently increased).

The main objective should be to find ways to use carbon neutral solutions if you deem CO2 to be a problem. Why the reliance on wind turbines which have a negative impact on the amenity and biodiversity? Why not solar?

### **1.3 Area generally south of Cloghan and Birr Environs**

The draft Offaly County Development Plan 2021-2027 (“CDP21”) has a different zoning for wind energy compared to the current County Development Plan 2014-2020 (“CPD14”) presented in the **County Wind Energy Strategy**

#### **1.3.1 Area generally south of Cloghan**

This area is characterised by a predominantly flat and in places slightly undulating landscape with a number of significant tracts of peatlands and transitional woodlands, and coniferous forestry in places. There also exists good wind speeds and reasonable access to the grid. The extensive tracts of flat peatlands in this area offer potential to accommodate a wind farm layout with depth, comprising a grid formation giving a better sense of balance and visual cohesion. In addition, there exists a precedent of windfarm and renewable energy projects developed in the area such as Meenwaun windfarm while other projects have been deemed suitable and are awaiting commencement of development. There exists both good wind speeds and electricity infrastructure in the area.

#### **1.3.2 Birr Environs**

There are a number of constraint areas within this area however which are not included in the areas deemed Open for Consideration for Wind Energy Development in principle as shown in the Map No. 10 below;

- the Little Brosna River Callows and Dovegrove Callows on account of their landscape sensitivities and presence of protected views; and
- the internationally important Irish Low Frequency array (ILOFAR) in Birr Castle which is particularly sensitive to wind turbines in its vicinity due to the Doppler effect which masks the radar signal and produces backscatter.

On page 22 it is stated:

*“These areas have been identified based on the sieve mapping analysis in Section*

5, a field analysis and desk top survey in Section 6, and have been informed by the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) undertaken in relation to this County Wind Energy Strategy.”

Area 7 is deemed 'Open for consideration for Wind Energy Developments':

“1. These areas are open for consideration for wind energy development as these areas are characterised by low housing densities, **do not conflict with European or National designated sites** and have the ability by virtue of their landscape characteristics to absorb wind farm developments. Notwithstanding this designation, wind farm developments in these areas will be evaluated on a case by case basis subject to criteria listed in Development Management Standard 109 contained in Chapter 13 of Volume 1 of this County Development Plan and the Section 28 Wind Energy Development Guidelines.”

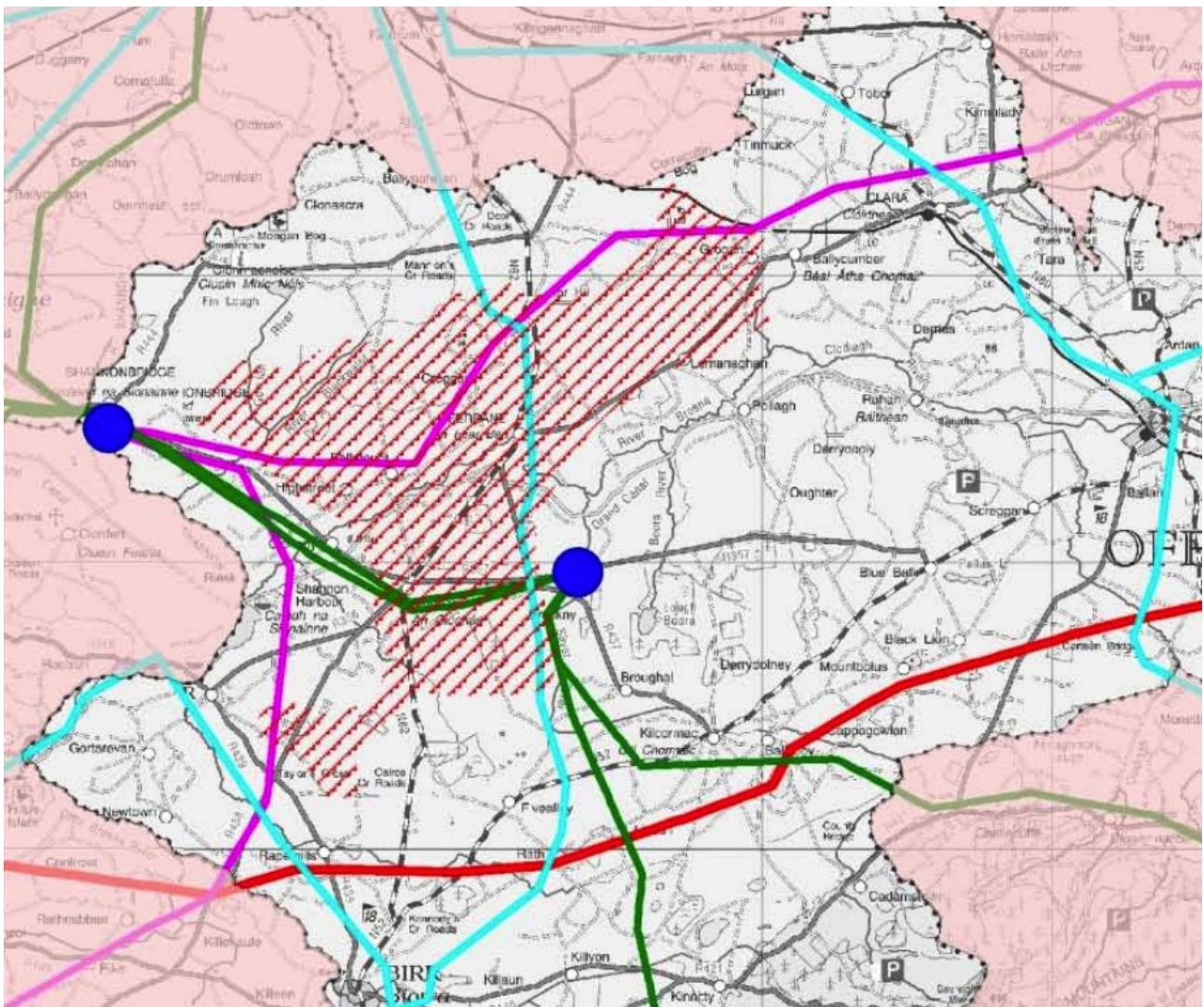
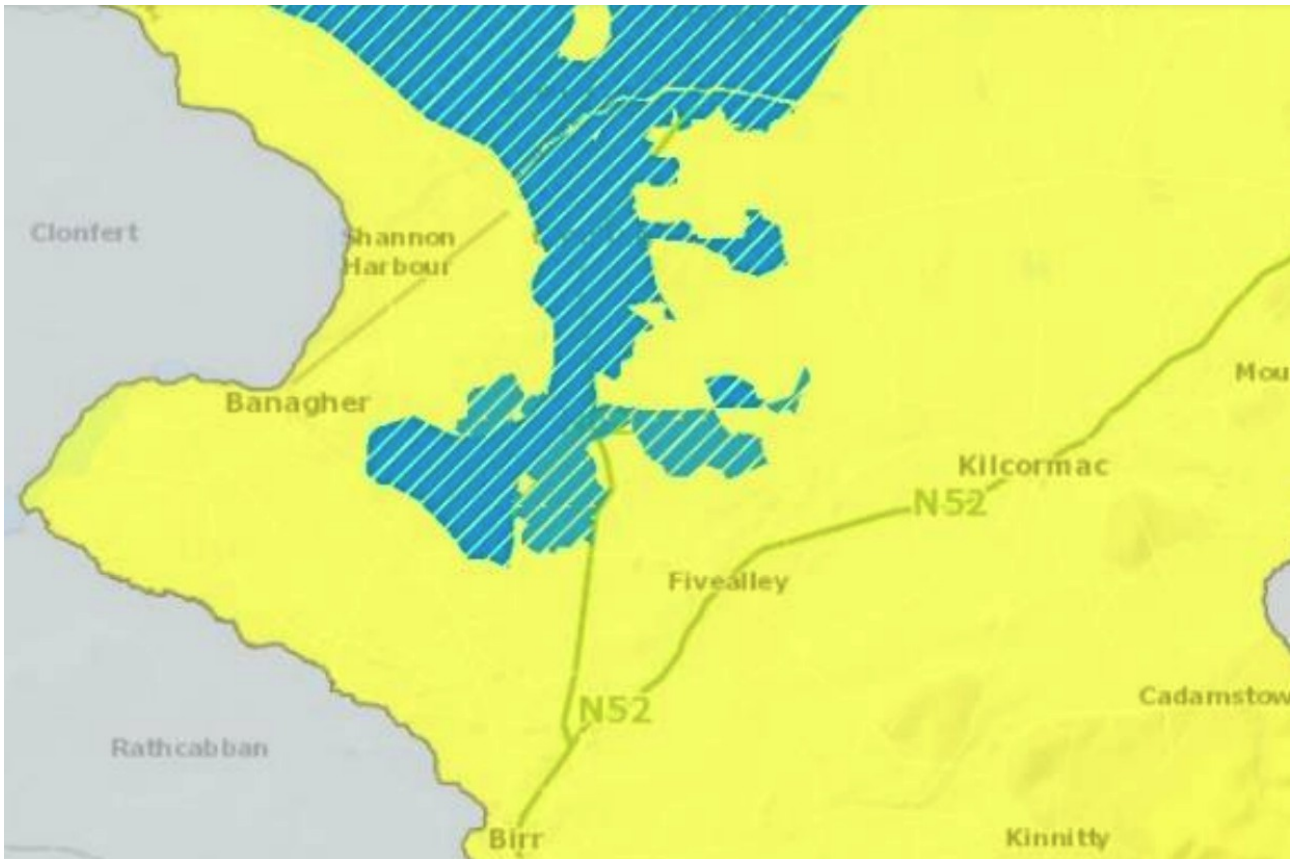


Illustration 2: Illustration 2: CDP14 Area South of Cloghan (7)



*Illustration 3: CDP21 Area South of Cloghan (7)*

The area added, which has the light blue colour, seems to be added to the original area deemed to be suitable for wind development. This map is so vague, that I can't exactly establish which area is now deemed to be in the suitable area. It looks as though this area also takes in a section south of the L3006 as is displayed in the picture on the next page, between L30061, L3006 and the N62.



Illustration 4: Garbally Lane (L30061)

There are several houses on L30061 which are all built on a 'height' with views extending to the east. This takes in a beautiful view on the Slieve Bloom mountains, which was the main reason why the houses had been built in the first place. The area just to the right of the L3006, accessible through a little laneway, which is called 'the tunnel', is low lying and boasts nice walks through bog land and forestry just to the south where you can meet a large number of species, birds, deer, rabbits, etc.

The draft plan doesn't really specify which elements have been used to justify changing the suitable wind development area, other than objective 3:

3. *"Identify key areas within the county that are 'Open for Consideration for Wind Energy Developments' or 'Unsuitable for Wind Energy Developments' based on wind speed, access to the electricity grid and substations, and avoidance of adverse impacts on the landscape and designated sites."*

It is not clear why the area has changed and which observations through either field study, desk top study, or otherwise now all of the sudden can have an impact on the boundaries of the now 'Open for Consideration for Wind Energy Developments'.

The legislative framework is described in objective 5:

5. *"Ensure full compliance with the requirements of EU SEA Directive 2001/42/EC and Statutory Instrument 436 /2004 [Planning and Development*

*(Strategic Environmental Assessment) Regulations 2004] on the assessment of the effects of certain plans and programmes on the Environment, and the Planning and Development Act 2000 (as amended), the EU Habitats Directive (92/43/EEC) and EU Birds Directive (2009/147/EC).”*

As is indicated on page 7 of the plan, there is one development, which is Meenwaun (see position in map above). The number of turbines is wrong in the table, it is 4, not 5. The capacity is, based on a turbine with capacity of 2 MW, 8MW, not 10 MW.

The capacity is not interesting though, what is important is the capacity factor.

Are there any reports available to the Planning Authority on the actual performance of Meenwaun in terms of generated total amount of electricity per year and displayed per day? Plus an indication of how many tonnes of CO2 have been displaced by the operation of the wind farm?

As can be deduced from the area map, allowing the area east of L30061 to be included in the Open for Consideration area, the houses on the L30061 will all be losing their unobstructed views. Not only will they be looking at the already existing 169 meter high turbines to the North West of the houses, but also to the North, if Bord Na Mona gets planning permission for Clongawny, but also to the east, if applications can be put in for wind development, which will give the impression to be surrounded by turbines and to be living in an industrial environment.

#### **1.4 Compliance Meenwaun planning app. 15/44.**

According to Condition 12 in the decision, the developer was supposed to send a noise assessment report after 6 months and a shadow flicker report after 12 months to the Planning Authority. Can you please supply me with a copy of same.

In order to know if the wind speeds are capable of producing any meaningful power, the utilised SEAI wind map is not sufficient. Live data from Meenwaun can establish if the benefits outway the negative aspects of wind turbines in the vicinity.

#### **1.5 Birds and bats in area 7.**

Ireland has commitments to protect its avifauna and their habitats through the Birds and Habitats Directives, 2009/147/EC, EEC 92/43 (1992). This protection afforded wild birds in Ireland goes beyond the Natura 2000 network (which includes Special protection Areas (SPAs) and Special Areas of Conservation (SACs)). European Case law has also clarified obligations to protect Annex I migratory, wetland and other Annex I bird species and to

protect habitat requirements of birds outside of designated sites. The Birds Directive makes special provision for wetlands and wetland birds while the Habitats Directive makes particular reference to corridors for the movement and dispersal of species in the wider countryside, including 'stepping stones' of habitats to support the Natura 2000 network of SACs and SPAs. ***A 2007 ruling of the European Court of Justice against Ireland (ECJ c.418-04) stated that Ireland has failed to '...fully transpose and apply the requirements of the second sentence of Article 4(4)' of the Birds Directive which states that '...Outside these protection areas (SPAs), Member States shall also strive to avoid pollution or deterioration of habitats'.***

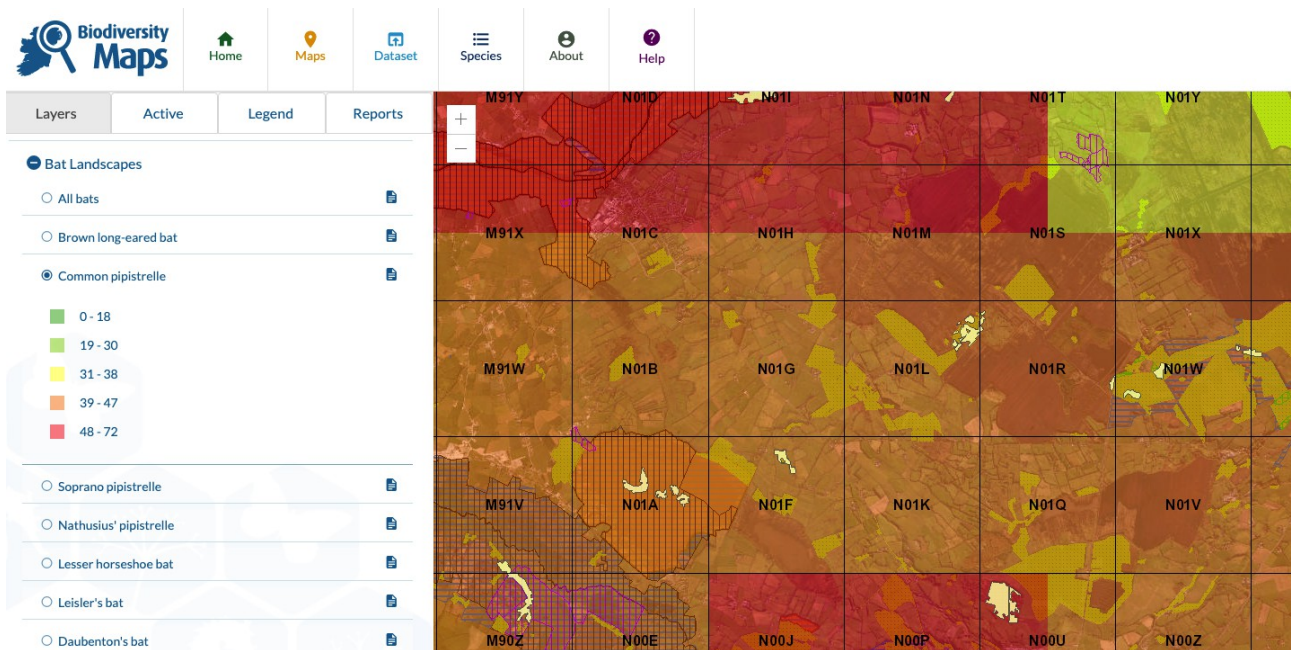
### **1.6 Wind development on birds and bats**

The relationship between wind energy developments and birds is variable and complex and depends on a number of factors including: the extent and type of development and associated topography, the type of habitat and individual bird species present, and their distribution and abundance in the area (Barrios & Rodríguez 2004; Drewitt & Langston 2006). Most threats can be minimized or reduced by avoiding sites with sensitive habitats and key populations of vulnerable and endangered species and increasing our understanding of the effects of wind energy on birds (Langston 2013). The main impacts of wind energy developments on birds are generally via four main categories; **collision** (Barrios & Rodríguez 2004; Drewitt & Langston 2006; Douglas et al. 2011; Pearce-Higgins et al. 2009), **disturbance displacement** (Madders & Whitfield 2006; Pearce-Higgins et al. 2009), **habitat loss or damage and barrier effects**. Each of these potential effects may interact (Drewitt & Langston 2006), causing an increase in the impact or a decrease in potential exposure (e.g. a reduction in abundance caused by habitat loss may reduce collision risk).

Are these four main categories sufficiently taken into account while considering the number of SPA's, SCA's and official woodland areas surround the proposed 'light blue area'?

I note that the developer of Meenwaun doesn't have to supply details to the Council about the loss of birds and bats.

Are any reports available to the Planning Authority on the loss of habitat (birds and bats) due to any of the existing wind turbine installations, Meenwaun, Leabeg and Mount Lucas?



It doesn't seem that the proposed additional area in light blue (N01Q, 2KM grid) is screened for bats and in particular the Common Pipistrelle. There are also a lot of birds in the area, like owls, birds of prey and the hen harrier, to be considered in light of the four main categories of impact due to wind developments.

## 2 Further remarks

Before allowing a redefinition of the 'open for consideration' area 7, the information and details about how the field and desktop study arrived at the area 7 (in light blue) as now defined within this draft plan have to be laid out and be able to be studied by the public concerned.

I'm opposed to public-private partnerships in terms of wind development, because the land owners that actually put wind turbines on their land, do not live in the area. Worse still, they would buy land in area's they feel will be utilised for climate change policies, again not affected by the negatives which neighbours have to face.

A lot of this Climate Change agenda seems to be derived from Agenda 21 (Earth Summit 1992), Agenda 2030 and the Sustainable Development Goals.

Agenda 21<sup>2</sup> is an agreement between the UN and certain countries, including Ireland. No country actually signed this agreement, it was agreed by consensus by the countries that attended the summit. Agenda 21 is not a treaty and therefore no law.

2 <https://www.un.org/esa/agenda21/natlinfo/countr/ireland/eco.htm>



Since when is this law in Ireland? Who voted for this democratically or had the opportunity to speak in favour of these SDG's in a referendum?

The pseudo science that somehow 97% of scientists believe the science is settled that man is mainly responsible for Climate Change and that CO2 is the main driver, should not be entertained. This statement has been thoroughly debunked<sup>3</sup>.



Illustration 5: Sustainable Development Goals (UN-SDG)

SDG 7 promotes Renewable Energy. Why take this decision for granted? The proposed use of biomass is already debunked. It's absolutely ridiculous to use peat or import wood chips from forests in the USA to be burned to produce electricity. Due to a wrong definition in the EU, biomass is deemed to be CO2 neutral. This is obviously totally untrue. It's time to ditch wind energy as well.

Better alternatives like Thorium<sup>4</sup> or the newest safe generation nuclear plants, as being built at the moment, are way better for the environment and climate:

1. no CO2 production
2. small area needed
3. safe
4. suitable for base load (not intermittent)
5. long lifespan

3 <https://climatechangedispatch.com/debunking-97-percent-nonsense/>

4 <https://energypost.eu/aneel-thorium-based-reactor-fuel-could-revive-nuclears-fortunes>

Negatives of wind turbines:

1. Wind turbines have a life span of max. 20 years.
2. Noise and infrasound
3. Shadow flicker
4. Kill birds and bats
5. Eyesore
6. Reduce house prices in vicinity
7. Against the right to have a sustainable environment<sup>5</sup>
8. Electricity is intermittent
9. Electricity is unreliable
10. Blades can not be recycled but have to put in landfill
11. Warping of blades can occur pretty quick and causes the lifespan to be dramatically to be reduced
12. Concrete will not be removed after decommissioning
13. Production of electricity cause constant subsidies which show up in the PSO levy
14. Restraint payments when electricity could have been delivered.

Without having any data on localised wind data, electricity generation reports, noise, shadow flicker, bird and bat fatalities caused by turbine installations in Offaly, it is totally irresponsible to try to promote increasing the amount of wind energy in Offaly.

I urge the Planning Authority to make this information available asap and make them the basis on which to decide to increase the 'sustainable' development of wind energy and in the interim to hold the finalisation of this plan.

The word sustainable needs to be redefined in the true meaning. Wind energy by massive wind turbines producing electricity for a national grid is neither sustainable nor effective.

I ask the Planning Authority to at the very least withdraw the area in light blue, restrict the development for wind energy to the areas that are now operated by Bord Na Mona, originally defined within CDP14 and in the EMRSES 2019 until such time all the relevant data is made available to make an informed decision.

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5 the right to a sustainable environment (as a basis for peace) Declaration of Luarca, 2006