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Waterford Development Plan 2022 - 2028

Submission on Wind Energy Development

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1. Introduction

The Development of Wind Energy in Waterford has been based on outdated and inadequate guidelines and strategies:

- The current Wind Energy Guidelines were published in 2006 and the review, announced in 2013, has yet to be completed.
- The Wind Energy Strategy for County Waterford was adopted in 2007.
- The County Development Plan was adopted in 2011 and should have expired in 2017.

The scale, size, output and proliferation of wind energy developments has increase dramatically since these documents were first written and adopted. Wind Turbines tend to be much bigger and taller now than they were in 2005 or 2010. Advances in technology and expertise now make the siting of wind farms far offshore more plausible and economical. Similarly, advances in solar energy generation, and the lower relative cost, make micro-generation for homes, business and institutions more realisable. Times have changed, and so too must our approach to wind energy development.

I welcome the opening of this public consultation. Allied to the need for up-to-date and fit-for-purpose plans and guidelines is the need for communities and individuals to have their concerns listened to. As a public representative I have encouraged my constituents to engage in this consultation process.

The very real need to diversify our energy mix and to strategically develop renewable energy in Ireland must not cloud our judgement and cannot be used as an excuse to adopt bad strategy or to implement bad planning.

This submission outlines a number of key issues relating to Wind Energy Development that should be considered in drafting and adopting a Development Plan for Waterford.

2. Background

2.1 Energy Mix

Displacing our reliance on fossil fuels with renewable energy will create a cleaner environment and enhance security of supply on the island of Ireland. We need a greater mix of energy sources and this mix should include wind energy.

Although an intermittent energy source, wind energy has potential given our climate and landscape. That said, intermittent energy sources are of limited value as they offer little in the way of control. We need to also identify and invest in on-demand energy sources that are clean and sustainable. Wind is not the solution to our energy needs, however it can form a part of the overall solution. The Development Plan should clearly outline a preference for the least intrusive generation methods.

2.2 Micro-generation

Micro-generation technologies such as roof top solar and small scale wind allow energy consumers to become energy producers. The use of micro-generation can be for self-consumption, with battery backup and/or to feed energy back into the grid. An unpublished Sustainable Energy Association of Ireland paper equated the potential from micro-generation at one fifth of current island-wide demand. The impact of micro-generation on the environment and amenity is generally considered to be significantly less than that of large-scale wind energy development. It would be wise for the Development Plan to take this into account.

2.3 Local generation for local use

Regard should be given to the possibility of micro-grids and a decentralised electrical grid becoming economical and operational over the lifetime of the Development Plan. Such localised systems of electrical generation and distribution support strategic energy security, facilitate integration of increasing sources of renewable electricity, reduce energy losses in transmission, increase efficiency of the delivery system, and empower communities and local authorities to make more autonomous decisions according to their particular needs or strategies.

2.3 Offshore Wind Energy

There have been significant advances in the siting of Wind Energy Developments at sea internationally. Germany, Britain, the Netherlands and Denmark have seen large-scale development of offshore wind farms in the North Sea. There is scope for Ireland to develop substantial wind capability offshore, although we must learn from successes and failures elsewhere.

Sea fisheries, and particularly smaller-scale inshore fisheries, are vital to coastal communities in Waterford. Similarly, the value of our coastline as a public amenity, draw for tourists, and habitat for flora and fauna is immense. We cannot jeopardise these in order to be an electrical generator and conduit for other parts of the island.

Marine planning is not within the scope of Waterford City and County Council, however I believe it is essential that the Development Plan makes reference to the need and desire to protect our coast and inshore waters from large-scale development that would negatively impact on industry, amenity and biodiversity. I have made a submission as part of the consultation on the draft National Marine Planning Framework.

3. Considerations

3.1 Community Consultation

Consultation with the community must be based on meaningful engagement and begin at the pre-application stage of a potential wind energy development. The community consultation process must begin a minimum of six months before an application for planning permission is made.

In order to be considered by the planning authority, an application for planning permission for a wind energy development should include a comprehensive Community Report, which, in addition to the requirements laid out in the draft wind energy guidelines, details the steps taken, or proposed, to address or ameliorate concerns raised during the community consultation. The report must demonstrate that the developer has made sincere efforts to engage with all members and sectors of the community including both individuals and community organisations.

3.2 Environmental Impact

An Environmental Impact Assessment should be mandatory for all proposed wind energy developments excluding micro-generation / non-commercial wind energy.

3.3 Considering Applications

In considering applications for wind energy development Waterford City and County Council should be required to consider the following matters:

- Environmental assessments
- Community engagement and participation

- Grid connection
- Geology and ground conditions
- Site drainage and impacts on hydrological table
- Landscape and visual impacts assessment
- Visual impact of ancillary development
- Impact on natural heritage e.g.. habitats, biodiversity, protected or sensitives sites,
- Impact on built heritage including archaeological heritage
- Impact on human health and safety
- Carbon emissions balance i.e. does the carbon footprint of construction/ maintenance make the development inefficient
- Impact of noise
- Impact of shadow flicker
- Impact of electromagnetic interference
- Adequacy of local access roads for facilitate development
- Decommissioning considerations

3.4 Noise

All consideration of application for wind energy development must consider the protections outlined in the EU Environmental Noise Directive.

3.5 Set back distance

Setback distance is a significant and important factor in minimising the impact of wind energy development on homes and communities. Notwithstanding the fact that larger set back distances impact on the scope for wind energy development, there is an onus on all those involved in planning to avoid inappropriate development that may cause long-term harm to the environment, landscape and rural communities.

I contend that a minimum set back distance of 8-10 times the tip height would be more appropriate, subject of a mandatory minimum setback distance of 1,000 metres. I have made a similar submission with regard to the draft Wind Energy Guidelines currently under consideration by Government. Regardless of the final guidelines from Government, the Waterford City and County Development Plan should offer the minimum protection of 1,000m set back.

3.6 Development Areas

Identifying areas where wind energy development is unsuitable should form part of the development plan process at local authority level, in tandem with the identification of key and potential areas for development. Communities should be empowered, through local consultations, to influence strategic decisions about their areas, taking into account local patterns of settlement, natural, cultural and built heritage, environmental protection concerns etc.

The 2007 Waterford County Council Wind Energy Strategy document mapped out yellow-coded 'Strategic Areas' (deemed to be 'eminently suitable') and blue-coded 'Preferred Areas' (deemed as 'suitable'). This left land and communities in those area vulnerable. The scale of wind turbines and wind farms has increased in the 13 years since this strategy was first adopted. The inclusion of these area designations, in the face of technological advancement, and without an in-build review mechanism, was misguided and must not be repeated.

The totality of Gaeltacht na nDéise should be identified as a 'No Go' are for wind energy developments. It is national policy to sustain and grow Gaeltacht communities, to encourage members of the community to remain within the community, and to encourage opportunities for enterprise, employment and economic growth in the Gaeltacht. The siting of wind turbines in Gaeltacht areas interferes with these objectives and provides no benefit to the community.

The totality of the Waterford coastline should be identified as a 'No Go' area for wind energy development, including that part of the coastline from Stradbally to Ballinacourty, and from An Rinn to Baile Mhac Airt. Areas that are identified as being ecologically sensitive or scenic should be designated as 'No Go' areas in the plan.

Areas where the siting of wind turbines would negatively impact on agriculture, inland fisheries, sea fisheries, tourism, public amenity or rural development objectives should be designated as 'No Go' areas.