

Cahermurphy Wind Farm
No II Opposition Group

Submission to
Draft Clare County
Development Plan
2023-2029



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We would wish to make the following observations in relation to the Draft Clare County Development Plan 2023-2029 and, in particular, the Draft Renewable Energy Strategy and the Draft Written Statement. This seems particularly pertinent given the large degree of public discontent and unrest that has been apparent in connection with recent planning applications for wind farms.

Initially it is encouraging to note that, amongst the goals listed in the Draft Written Statement on page 11, the following are set out.

*“A county with diverse and strong rural communities and economy, where its natural resources are sustainably managed in a manner that is **compatible with the fragility of rural areas and the existing quality of life.**”*

*“A county where **healthy and sustainable communities are developed** and integrated with the timely delivery of a wide range of community, educational and cultural facilities and where, through a commitment to equality, participation, accessibility and social inclusion, the county develops as a **unique location with an enhanced quality of life for its citizens and visitors.**”*

*“A county of ‘living landscapes’ where people live, work, recreate and visit **while respecting, managing and taking pride in the unique landscape of the county.**”*

*“A county that **protects and enhances its unique natural heritage and biodiversity** and recognises the potential for sustainable green infrastructure development, while promoting and developing its cultural, educational and eco-tourism potential in a sustainable manner.”*

These particularly highlight the Council’s, and therefore our elected representatives’, concerns for their constituents and the environment in which they live and should be applauded.

In Chapter 8, Rural Development and Natural Resources, one of the strategic aims is

“To harness a pride of place among rural communities and to assist rural communities to promote their cultural and natural resources.” (Draft Written Statement, P164)

It goes on to indicate that the Council supports the NPF statement that the rural countryside

“is and will continue to be, a living and lived-in landscape focusing on the requirements of rural economies and rural communities, based on agriculture, forestry, tourism and rural enterprise, while at the same time avoiding ribbon and over-spill development from urban areas and protecting environmental qualities” (Draft Written Statement, P164)

There are many similar references throughout the written statement that would also suggest the elected representatives concern for the population they represent and the environment in which this population lives. Even when it first comes to the subject of renewable energy the written statement generally starts positively, stating quite clearly, that

*“**the development and siting of wind energy projects must be balanced with the potential impacts on the landscape, ecology and the amenities of local communities.**”* (Written Statement, P174).

Unfortunately, though, when it comes to the specific development plan objective for renewable energy development (Written Statement, CDP 8.12, P175), these positive statements appear to have been ignored and there is no mention of the population nor their environment in the objective as it is presented in the written statement.

In Chapter 11, Physical Infrastructure, Environment and Energy, there is again some recognition that renewable energy development needs to be balanced against the quality of life and environment of the local population. Thus CDP11.47 states that it is an objective of Clare County Council:

“To strike an appropriate balance between facilitating renewable and wind energy-related development and protecting the residential amenities of neighbouring properties;” (Written Statement, P 283)

However, sadly, this is only one sub-section of the nine listed under this objective and none of the remaining sub-sections refer to people, their amenities or their properties

It is also noted that it is an objective *“To prepare a new and updated Wind Energy Strategy for County Clare during the lifetime of this plan, subject to the publication of the update to the Wind Energy Development Guidelines for Planning Authorities 2006;”* (Written Statement, P283), but with no suggestion that this will be a draft that will be put out for public consultation.

It is this lack of balance between the interests and well-being of the Clare population in general and the push to meet and, in some cases, exceed the more general targets set at a national level that is of concern. This is not necessarily to suggest that these targets should be ignored but rather to indicate that there may be other ways in which these may be achieved.

It is surely necessary that the Council seriously consider a wide range of creative ideas in relation to renewable energy in order that County Clare continue to be ***“noted for its agriculture, tourism and beautiful landscapes”*** (Written Statement, P10) rather than becoming the industrial landscape that would be inevitable should we continue to condone the development of increasingly higher, industrial-sized, wind turbines in an already saturated area.

When it comes to the Renewable Energy Strategy that forms part of the Draft Development Plan there are a range of questions to be asked regarding the draft strategy surrounding the wording used and the need and advisability of many of these. Some statements seem unnecessarily excessive and others clearly open the door to unintentional, misleading interpretation by developers.

A clear example of apparently excessive wording is to be found in the vision set out in the document. It clearly states the wish *“to position the County as **the** national leader in renewable energy generation,”* (Draft Renewable Energy Strategy, P9) rather than **a** national leader.

Is it really necessary to aspire to be the ultimate leader in such a field?

Surely such a statement could lead developers to argue that a particular development should proceed when other factors make it unsuitable? Arguments similar to these have already been quoted in applications and appeals for wind farms where developers have quoted statements from the current County Development Plan which, when taken out of context, would appear to support their case.

An example of this misuse can be found in the appeal document currently before An Bord Pleanála for the Cahermurphy II Wind Farm. In it the appellant quotes CDP10.11 from the existing Development Plan but does not refer to the section in the text on the same page, which states *‘the development and siting of wind energy projects must be balanced with the potential impacts on the landscape, ecology and the amenities of local communities.’* (Clare County Development Plan 2017-2023, P168).

When considering progress and outlook for specific sectors (Draft Renewable Energy Strategy , P9-10) there are some interesting and useful conclusions that may be drawn. It is clear, for instance,

that Clare could do considerably more to develop the use of biomass and energy crops which, in turn, would help towards developing further the use of biofuels and district heating schemes. There is also a clear potential for increased development of solar energy, marine renewables and offshore wind, with the latter having a huge potential. It is also rightly acknowledged that *“Installation of individual and community scale renewable energy projects will make a significant contribution to Ireland’s and Clare’s renewable energy and carbon targets.”* (DRES, P10).

The reference to a target when considering onshore wind energy is another example of the opportunities developers may take to use the council’s own words as positive support of their case. Whilst acknowledging that targets must be set we would urge that any wording used is carefully considered in order that it provides for as little misinterpretation and misuse as possible.

The targets for 2030 set out on page 11 are clear although it is disappointing to note that no target has been set for offshore wind. It would surely be prudent to safeguard the overall target of 1,167.3 MW by including a statement which makes it clear that these are indicative only and could be vired between different headings. This would certainly allow for offshore wind capacity to be easily included during the life of the plan if relevant and thereby contribute to the total.

It is encouraging to note that *“An aim of the Renewable Energy Strategy is to raise awareness of micro technologies and their advantages”* (Draft Renewable Energy Strategy, P12) as this would appear to be an area of great potential within the County.

There is frequent use of the word ‘maximise’ within the document and, once again this is surely of some concern as it suggests *‘getting the most out of’* or *‘exploiting’* the significant renewable energy resource that County Clare possesses. There is scant mention of the balance needed between optimising these resources whilst maintaining a balance with the residential amenities and health and welfare of the population involved. Indeed much of the new draft strategy is identical to the previous version and one has to question whether this reflects the considerable developments in renewable energy production that have occurred in the intervening years.

When considering the renewable potential, resource and targets for County Clare in Chapter 4 a clear hierarchy for the analysis is laid out which, for purposes of the document, results in the identification of ‘Accessible Resource’. Throughout the explanation of the methodology involved there is only one passing mention of the restrictions that might exist due to consideration of the effect on people and their environment.

*“A more balanced approach would be to examine the targeted renewable energy potential based on available resources, taken together with all other considerations, including environmental requirements, availability of grid connections, **impact on community** etc.”* (Draft Renewable Energy Strategy, P45).

There is no indication of how this issue has affected the final targets laid out. This certainly does not inspire one to feel that the Clare County Development Plan as proposed will necessarily be in the best interests of its inhabitants when it comes to future developments.

It is interesting to note that the only difference to the targets set is the addition of targets for solar and the removal of any target for offshore wind. It is unfortunate that the figures presented in Table 4.3 on page 46 of the Draft Renewable Energy Strategy contain an error and that the sub total for electric should be 1010.7 MW and the overall total renewable target is therefore 1256.3 MW and not 1167.3 as stated.

In considering the case of energy provided by onshore wind the document reiterates the information provided in the current Wind Energy Strategy and includes a section on the potential for repowering existing wind farms. Once again there is little in the way of consideration of the effects on residential amenities and the populations that would be affected. There is again no commitment given to publishing a draft of any future Wind Energy Strategy and making it available for public consultation. Given that this area has been prone to strong emotions when it comes to potential developments this is surely a serious omission.

Moving on to consider solar energy production a map is provided (Draft Renewable Energy Strategy , Map 7.2, P68) which indicates that very large areas of the county provide the potential for this. It is surely worth considering the possibility of dramatically increasing the number of smaller installations that the extensive proliferation of farm buildings presents across the county and thus reducing the need for larger, more intrusive developments. Indeed, it appears that whilst the potential for microgeneration has been acknowledged (see below) this has not been linked to the chapter on solar energy. This surely fails to recognise the true nature of micro generation as an integral component of multiple technologies.

There is clear acknowledgement of the potential for micro generation in Clare and this is an area where great benefit is possible with minimal disruption to individuals and communities. Whilst the development of small-scale projects would not necessarily contribute towards targets for energy production they would certainly reduce the usage from the national grid and increase the percentage of electricity used in Clare from renewable sources. This has the added benefit that a 5kW wind turbine can easily be installed on a 12m pole and therefore be far less intrusive in the landscape. It is encouraging to see that one of the objectives is *"To promote the uptake of incentives, schemes, grants and other available funding to improve energy efficiency."* (Draft Renewable Energy Strategy, P 97) and it is hoped that this would include working with national bodies to extend the range of such grants in order that there is a greater uptake.

When consulting the chapter on 'Environmental Considerations and Development Management Advice' several points stand out. In assessing the success or failure of renewable energy projects some key points were highlighted. These suggested that successful projects are apparently characterised by a number of factors including the following:

"Continuous and meaningful community consultation;"

"Minimising environmental, traffic, or visual impact;"

"Broad community support;"

and

"Protection of residential amenity."

At no other point in the draft strategy is serious reference made to continuous and meaningful community consultation or broad community support and although there is some small mention of minimising visual impact there is a minimal amount in regards to the remainder.

Surely if these are the key to successful projects then not only should they be outlined in more detail in this document but they should be fully and properly investigated in relation to planning applications submitted. Indeed one suggests that if this is truly the case then there should be a section devoted to it in this chapter and it should clearly set out what the County would expect to see as evidence of this. Whilst there is some reference to this in Chapter 18 the statements are very

generalised and do not present a clear picture of what should be seen as evidence of community engagement.

In conclusion we wish to make it clear that we fully support the principle of renewable energy and understand its increasing importance regarding the climate change crisis. We do, however, believe that the development of all renewable energy installations must be balanced against the potential short- and long-term effects on the surrounding population and environment and must be considered on an individual and cumulative basis. With the saturation of wind turbines which currently exists in West Clare there needs to be a mechanism for preventing overdevelopment and there is clearly not one in this document.