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A Chara,

As residents of an area zoned 'in principle' for wind farm development and presently under siege from wind farm developers looking to exploit the subsidies available to them and sell on developed wind farms to foreign companies (ie Mt Callan wind farm has recently been sold to a Japanese corporation). We ask that you take our concerns and suggestions into consideration.

We have made submissions to the Draft County & North Clare Development plans for the past ten years, and, looking back over these submissions, none of our very serious concerns have been addressed. In ten years, nothing has changed except that we can now see wind turbines from every window in our house, and we suffer from noise pollution from the turbines on Mt. Callan.

The area is already saturated with industrial wind turbines and has completely changed the landscape and character of the area. The development of numerous wind farms to date in the County has proven extremely damaging and divisive in rural communities.

The following are a number of proposals for inclusion in the County Development Plan 2022-2028:

- That the future development of wind farms in County Clare is directed by a legally binding framework of conditions (not just guidelines or

recommendations of best practice) that the developers are bound to follow. That these conditions are supported in law and that a failure to comply will lead to monetary penalties or the removal of permissions. That these conditions are strictly enforced. This is of particular concern as the wind farms are sold on, potentially multiple times. Who is accountable?

- That there is complete transparency in relation to the long term objectives of the proposed development in relation to future related development. For example a pumped hydro development on Mt. Callan reference in Volume 6 of the Renewable Energy Strategy. A massive industrial development such as a PHES would require further wind farm construction in West Clare. There have been and applications for huge increases in capacity to the grid, which would indicate that preparations are being made for enormous development. This is causing alarm in local communities.
- That the quality of life issues (health, noise, flicker, amenity, property values, other landscape uses) raised in rural communities around the world who are targeted for wind energy development are taken seriously and prioritised by our public representatives and that to this end a comprehensive socio-economic study of potential impacts and real (not hoped for) benefits be undertaken and incorporated into the strategy.
- That genuine consultation take place in the communities targeted for such developments. That 2 years prior to planning applications the developers notify all households within 10 km of the development by post and provide sufficient opportunities for consultation. That impartial legal advice is made available at no charge to those who have concerns in relation to the proposals and that these concerns are related back to the council and its public representative to become part of the decision making process. That developers must show how the views and concerns of ALL the residents living in close proximity to the turbines are being addressed.
- That the Department of the Environment, Heritage and Local Government guidelines on distances from dwellings be reconsidered and extended from a mere and arbitrary 500m to the international recommendation of 2km in rural areas. The 2km guideline distance should be applied from the boundaries of properties of people who are not participants in windfarm projects as the individual has the right to enjoy the benefits and amenity values of one's entire property and not just their dwelling house.
- That the current zoning of 'Strategic areas' surrounded by 'Acceptable in principle' areas be reconsidered. The juxtaposition of both zones for potential development has lead to an accumulation of adjoining wind farms and an unacceptable density of turbines in concentrated areas. This strategy has produced blighted, industrial landscapes in areas once designated as '*visually vulnerable*' and valued for their '*pristine landscape*' qualities under

the Landscape Character Assessment of Co. Clare 2004, which also recommends *'preserving the remaining areas of blanket bog and its associated traditional uses and maintain if possible the sense of openness in upland areas, in particular the pristine landscape value of Sliabh Callan and Ben Dash'*. The strategy should also consider the visual impacts of such concentrated development on the county at large. The cumulative impact of this kind of development is also damaging to the tourism industry, which is a major employer in these areas.

- That there will be stringent adherence to the EU and National directives on Habitats, Water and Groundwater, and that the potential for landslides be taken seriously and proper procedures put in place for mitigation of such dangerous potentiality.
- That consideration is given to the fact that Mt. Callan and environs has been proposed as an "Important Bird Area", due to the high density of the Hen Harrier in this area and as such is an area of European interest. This area should be designated a turbine exclusion area.
- That planning applications contain detailed, honest information in Environmental Impact Studies, maps and visual representations. EIS submissions by developers present the "best case" scenario from the developer's point of view. It is not feasible for small communities to fund additional EIS studies whereby objective alternative findings and viewpoints may arise. There should be a central fund to provide additional alternative EIS studies where the findings of the original EIS have been shown to be inaccurate, flawed, misleading and/or subjective.
- That a compensation programme as used in Denmark is developed with consideration for locals who are impacted by the development now and into the future (eg. future planning restrictions which would limit our childrens opportunities to live in this community)

Currently, community funds do not benefit those directly impacted by the wind farm developments and the effect is to divide communities. Presently, residents who exercise their democratic right to object and express their valid concerns for the health and safety impacts on their homes and families are automatically excluded from any community benefits. Outlying villages are being bribed with 'community funds' while those who have to live under these giant, intrusive and loud industrial turbines are ignored.

That a range of options be made available, from a purchase of property at a fair price option to free electricity for households and local businesses, to free electric vehicle public transport for the elderly and handicapped in the locality. These schemes should be in place and be discussed with affected householders prior to the submission of any planning application.

Free electricity for small businesses would provide a competitive edge to their business, encourage locals to stay in the area and also generate employment.

Homeowners within a certain radius should be subsidised for energy saving schemes (insulation, individual turbines, solar panels) which aim to be self sufficient and put back surplus in the national grid, thereby making every house a potential producer of energy. The subsidies could be at different scales depending on the proximity to the turbines (100% in 2km radius, 75% in a 2.5 km radius, etc...)

- That the visual impact of the wind farms be consistent with the usual considerations for all planning applications. The same rules must apply.
- Consideration should be given to the erection of smaller turbines in areas where the visual impact will be greatest. Screening by vegetation as a mitigation factor is minimalistic and should be ignored in applications. Photomontages should be carried out in consultation with the local communities most affected and every dwellinghouse within 2km of a proposed turbine should have a visual evaluation in addition to the evaluations for noise, shadow flicker, etc.
- That a full archaeological survey including an archaeological geophysics survey, be undertaken by the Council of the zoned areas prior to planning applications. The current records are not comprehensive enough and do not account for sites that could be uncovered during construction works.
- That other, less intrusive, renewable energy resources are encouraged and promoted (eg wave, tidal, solar). That there is a focus on micro generation of energy, with the option of residents selling electricity back to the grid, which would reap benefit for residents – not developers who sell industrial wind farms on and get the subsidies.
- That a comprehensive decommissioning plan outlining who is responsible and how it will be financed is part of all wind farm development proposals and that the council prepares legal planning requirements on how decommissioning is managed and regulated within an acceptable timeframe. Again, as wind farms are sold on to foreign companies, who is accountable?
- That monitoring and – critically - enforcement of noise and flicker impact **MUST** be carried out by an independent authority with no ties to the developers. At present, the County Council has stated they do not have the resources to do the monitoring necessary, and refer any concerns a resident may have back to the developer. This is not acceptable.

- That monitoring equipment should be made available free of charge to all residents who request it and they should be able to access the resulting data. This would be in the interest of transparency and community health & safety.
- That we learn from the experiences in countries such as Denmark, France and Germany who have are far advanced in the development of wind power.

We urge you to implement these suggestions and those of our neighbours, who have to live near these industrial wind turbines, in the new County Development Plan.

Thank you,

Kathleen Connelly & Seán Tubridy