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SUBMISSION ON:



ON BEHALF OF:

**HUNTER'S HOTEL
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Co. Wicklow**

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TOWARDS A SUSTAINABLE ENERGY FUTURE

1: General Policy Considerations

- Ireland's landscapes and seascapes are the country's most valuable physical resource. They are central to our tourist industry, our heritage and our quality of life. Preservation of our scenic landscapes should be a central government objective in all policy areas including energy policy
- **Recommendation 1**
In choosing policy options for a sustainable energy future, priority should be given to options with the least impact on landscape heritage.

2. Renewable Energy

- In working to enhance the contribution of renewable energy to the energy mix, landscape impact should be seen as a key indicator of sustainability.
- **Recommendation 2**
National policy should favour promotion of renewables with the least impact on landscape.

3. Wind Energy

- Wind farms have a high potential to diminish landscapes and seascapes of significant visual amenity. For Ireland this is a major disadvantage.
- **Recommendation 3**
A cost/benefit analysis of wind as a suitable renewable energy option for our country should be carried out with its inevitable landscape consequences weighed up against potential contribution to national objectives of security, sustainability and competitiveness

4. Offshore Wind Energy

- Ireland's iconic east coast seascapes, (Brittas Bay, Wicklow Bay Killiney Bay, Dublin Bay) are a major national asset. Their scenic quality is central to the quality of the visitor experience on the East coast and to amenity of local residents
- These seascapes, are listed for preservation under "views and prospects" in all East Coast County Development Plans. Their industrialisation with the biggest offshore wind farms in the world, as currently proposed, would be contrary to the proper planning and sustainable development of the area.
- Irish legislation (Foreshore Acts 1933 to 1998) governing construction at sea is out-of-date and inadequate to protect the public interest in light of new offshore development proposals.
- In the past few years, this inadequate regulatory regime has allowed the two biggest offshore wind farms in the world to be approved off the coast of Wicklow without the statutory involvement of local authorities and with no right of appeal.
- In terms of turbine height, (160 metres) number of turbines (total 420) and distance from shore (9/12 km) these wind farms are seriously out of line with best practice internationally.
- As stated in the current Green Paper, (2.2.17), offshore wind is still at an early stage of development. The environmental impacts of large installations have not been analysed. By end 2005, some 700 MW of offshore wind power had been installed worldwide (60% of this in Denmark and 30% in UK). It is clearly disproportionate that 1,600 MW has now been approved off the Wicklow coast on the sole authority of the Minister for the Marine. The height of the turbines gives particular cause for concern. The mega 5 MW turbines (160 metres /525 feet high) approved for the Codling Bank Wind Farm, 12 km off Bray Head, are still at a prototype stage. They have been designed for use in deep water wind farms, far from shore. No other country in the world has permitted these mega turbines so close to sensitive coastlines. Their major adverse visual impact on the North Wicklow coastline and Killiney Bay has not been openly acknowledged.

In the face of growing concern about the potential negative impacts of large scale offshore wind farms, most EU coastal states are revising their approval procedures. Netherlands and Germany have banned offshore wind farms, other than a few small test facilities, within the 12 nautical mile limit. France's existing regulations and Spain's draft regulations call for a public inquiry before any offshore wind farms are permitted off the coast. Denmark and the UK, (together accounting for about 90% of installed wind power in the EU) both carried out Strategic Environmental Assessments of their entire coastlines before offering sites for possible development. Denmark, in addition, has a public right of appeal. France, Spain, Portugal, Norway, Finland, Italy and Greece have not permitted any offshore wind farms in their coastal waters. Sardinia has banned all offshore wind farms to protect its tourist industry. Outside the EU, no offshore wind farms of any size have been constructed. The USA is currently overhauling its regulatory regime in response to huge concern about the possible environmental impacts of the first offshore wind farm proposed in US waters, 9kms off Cape Cod.

A study of international regulatory regimes for offshore wind farms reveals worrying shortcomings in the Irish system. In short, the biggest wind farms in the world, with large numbers of mega turbines are being permitted close to scenic, high amenity coastlines by the Minister for the Marine without the statutory involvement of local authorities and without any public right of appeal.

Recommendation 4

A new Regulatory Regime to govern the permitting of offshore electricity generating stations in Irish waters should be urgently introduced.

This should include provision for appeals in relation to Foreshore Licenses and Leases and for an extended role for local authorities in relation to the coastal zone. (The Government's "Action Programme for the Millennium" contains a commitment to introduce such reform.)

5. Policy and landscape

- Energy policy has impacts on landscape. To date this impact has not been officially acknowledged with relevant stakeholders not included in key consultative committees

Recommendation 5

- In view of the landscape implications of energy policy, key heritage and tourist organisations should be represented on national strategic energy planning committees

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