

Inchicurka
Dunmanway
County Cork
14th Feb 2017

The Minister
Department of Communications, Climate Action and Environment
29 - 31 Adelaide Road
Dublin
D02 X285

**Re: Commissioner for Environmental Information
Public Interest Disclosure (Case CEI-15-0032)**

Dear Minister,

I refer to the finding by the Commissioner for Environmental Information in case CEI-15-0032) where he stated that:

"If disclosure were to lead to a submission being made to either or both Departments which was of such significance that it could not be ignored, such a submission would appear to be highly important and very much in the public interest."

The disclosure referred to includes a report commissioned by SEAI and prepared by RPG in 2015, showing that the size and ramifications of planned wind farm development far exceed the parameters in current use. Section 3.2.3 of the report states that the typical wind turbine size in any future development is likely to have a power rating of 3.5MW and a tip height of 150 to 175m (up to 190m in low-wind areas).

This is five (5) times larger than the 0.66MW wind turbines typically installed in 2006 when WEDG06 was issued.

Table 3.2 of the report shows that an estimated setback distance of 1209m would be necessary to meet the 40dB absolute noise limit proposed in the draft revision of WEDG06, and even with a 45dB limit the setback is estimated as 782m.

Compare these (Government-Commissioned Study) figures to Section 5.6 of WEDG06 which states:

"noise is unlikely to be a significant problem where the distance from the nearest turbine to any noise sensitive property is more than 500 metres".

The disclosure is certainly of a significance that cannot be ignored, and it is indeed in the public interest that the following submission should be made directly to you:

1. The proposed revision to the Wind Energy Development Guidelines (WEDG06) is now three years overdue;

2. The existing, obsolete guidelines do not afford proper protection to rural residents;
3. The Government has been shown by the CEI-ordered disclosure above to have commissioned modelling that reinforces the point that WEDG06 does not afford proper protection to rural residents.

Public Planning Policy

Public planning policy implemented by all administrations in Ireland over the past 50 years or more has supported dispersed rural housing rather than the consolidated settlement pattern found in continental Europe where farms are huge and farm labour lives in consolidated hamlets and villages. Irish farms have historically been small, and sons and daughters frequently build on parcels of land from the family farm, or farmers have sold off plots to people who prefer to live in the quiet of the countryside.

The direct consequence of this historic planning policy is that there is far less potential to develop wind farms in Ireland than there is in continental Europe, without adversely affecting the lives of large numbers of people who have their homes in rural Ireland. Key Objective 5.6.1 of the draft revision to WEDG06:

"seeks to achieve a balance between the protection of residential amenity of neighbouring communities in the vicinity of wind energy developments, and facilitating the meeting of national renewable energy targets".

The reality is the opposite of this claim.

The planning code is well used to balancing competing interests. The key tool used for this is Zoning Policy, whereby incompatible uses are kept apart by appropriate zoning. Industrial activities are directed to areas zoned for industrial use and homes are built in areas zoned for residential use. This is a sensible approach that has stood the test of time.

It is simply unacceptable and contrary to natural justice to attempt to justify shoehorning of massive wind turbines into inappropriately close proximity to people's homes.

I therefore request that you use your office to ensure immediate enactment of adequate protection (no less than that proposed in the draft revision of 2013) in order to protect rural dwellers. The present regime constitutes improper and unsustainable planning.

Yours sincerely,

Nigel de Haas