

Submission for:

‘Draft Leitrim County Development Plan 2023-2029’

We are not engineers or environmental scientists but we have knowledge and experience of living / working in Leitrim and loving and caring for our county.

We respectfully ask you to consider our comments carefully.

We agree with many of the aims of the draft, however we would like to make the following comments.

The transition of Leitrim to a low carbon and climate resilient County is of urgent concern and our aim too. We ask that this is a **just transition** for the citizens of Leitrim.

Capacity of Wind Farms in Leitrim:

The rspgroup.com, Capacity Study, Appendix IX states:

‘The Capacity study concludes that there is very limited capacity to absorb future proposed development in the form of wind turbines and wind farms.’

In concerning contrast the draft RES has identified the potential of Leitrim to increase its wind energy operational capacity by 90% in the period up to 2030 through a combination of repowering, extending existing wind farms and new wind farms.

(Table 12.3: Co Leitrim Wind Energy Target Potential 2030)

We call on the council to pay greater attention to the rspgroup report and amend the County Development Plan accordingly.

The large scale height of current and future turbines is in contrast to existing wind turbines in Leitrim:

The extraordinarily LARGE SCALE of any proposed turbines built in Leitrim does not appear to be appreciated in the draft.

There are only 4 such large scale turbines in operation in Ireland.

(Meenwaun, Co Offaly). The Meenwaun engineers stated construction was a challenge and this was on a relatively flat landscape.

Currently there are ongoing complaints of excessive noise to Co Offaly Council from people living close to the wind farm.

Given that existing wind energy developments in Leitrim are the subject of environmental noise complaints these proposed taller turbines are not suitable for our county's landscape.

Repowering / replacing older turbines

The draft discusses repowering as part of it's renewable strategy.

Repowering is also very problematic due to the larger scale of current and proposed turbines.

eg: replacing 50mt tall turbines with 185 mt tall. This in essence would be to redesign the complete wind farm, access, environmental impact, foundations etc etc.

In this case repowering appears to be a smokescreen to circumvent planning.

Repowering should be assessed as a new wind farm development.

Extension of wind farms

In the same way **an extension of a wind farm should be assessed as completely new wind farm development.** eg: extending an existing wind farm of 100mt tall turbines with additional turbines of 150mts

12.6.1. Draft Leitrim County Renewable Energy Strategy.

'Co. Leitrim has a longstanding record of promoting and accommodating the development of renewable energy technologies, principally wind energy, with the county containing excellent wind resources and grid infrastructure. This has been to the benefit of the local economy in terms of jobs sustained by the industry, either in construction or operational terms, but also in fostering the sustainable credentials of Co. Leitrim as a forward-looking, progressive and environmentally conscious county. This in turn will appeal to enterprises and industries as a location to establish their own operations.'

Respectfully we point out this key strategy is flawed in the following ways:

1. The grid structure is weak.

Eirgrid has recently undertaken consultations on a strategy to achieve 70% clean electricity by 2030 called 'Shaping Our Electricity Future'. The document sets out clearly why the current developer-led renewable energy generation strategy has located wind farms in locations remote from the grid which has resulted in huge costs to move this power to the population centres where electricity is most needed.

Generation-led strategy puts clean electricity generation close to where most power is used and this is the favoured option.

2. Wind Farms do not benefit the local economy in terms of jobs sustained by the industry.

eg: Proposed Croagh wind farm, if built would employ maximum of only two long term jobs. Construction is short term, eg. 18 months and does not normally employ many local people.

3. Leitrim could achieve a far more progressive and environmentally conscious sustainable credentials by adopting a small scale, truly sustainable approach to renewables.

eg: solar panels on every barn roof in Leitrim, imagine the employment that would create.

4. In addition, wind farm community funds, which appear at first glance to benefit the local people, are in fact tax payers money. The wind industry is heavily subsidised. This is not a sustainable model. Wind farm Communities Funds are very successful at dividing local communities, possibly making it easier for unsuitable planning applications to be approved.

Micro-generation:

We very much agree with the support and facilitation of micro - generation renewable technologies, incorporating solar, wind, hydro-electric and bioenergy.

However, we would like to see in the draft a strategy for **'how'** micro generation would be supported.

We would like to suggest a 'think tank' approach, drawing on the creative residents of Leitrim to fast track solutions. People throughout the county are already practicing this micro-generation of energy.

We would also like to suggest a stronger emphasis of reduction / reusing of energy, again the 'think tank' approach using our local creative talent could work well.

Retrofitting homes:

currently oil based insulation is used in retrofitting homes. Local hemp and sheep's wool insulation would be a more sustainable solution. Developing these products in Leitrim is feasible.

eg: addressing food packaging, (largest volume of plastic waste in 2021) is an example of another relevant area of reducing our energy use.

We suggest the draft take a wider look at the current 'green solutions' to cutting carbon emissions. So called 'green' is not always clean.

Current wind industry guidelines:

The wind industry guidelines are seriously outdated, implemented in 2006 when the average turbine height was 50mt tip height.

Wind turbines have vastly increased in height over the last 16 years but the guidelines are the same.

These outdated guidelines do not adequately protect people living close to wind energy developments or the environment.

Leitrim County Council has the responsibility to protect our health, our well being and our enjoyment of our homes.

The draft does not adequately address these basic human rights.

Tourism:

Overseas and local visitors cite beautiful scenery, good range of natural attractions and natural, unspoilt environment as hugely important factors in their decision to visit the County.

The majority of people who come to Leitrim spend time in the outdoors and the tourism operators in the area* feel that industrial scale wind developments will seriously impinge on tourism numbers to the area.
(*19 Leitrim businesses asked)

We urge you to strenghten the draft to preserve the very core offering that Leitrim has for its visitors

Commercial rates generated by wind farms:

The wind industry is lobbying to reduce commercial rates for wind farms, so that they are inline with the lower commercial rates for fossil fuel plants.

Commercial rates from the wind industry in Leitrim are a somewhat volatile source of County Council income.

It may not be too far fetched to suggest that in order to support and encourage the wind industry the government may reduce commercial rates further.

Has a cost / benefit analysis for the wind industry in Leitrim been included in the research for the draft?

We urge you NOT to remove any time limiting conditions on permissions for wind farm developments.

We strongly urge you NOT to extend the areas that will be considered suitable for wind farm development into slightly more sensitive landscape areas.

We strongly urge you to NOT to consider uplands / moorland landscapes to accommodate wind energy infrastructure.

We urge you strongly to take the lead in protecting our landscape and citizens and please do NOT be led by the wind industry.

We urge you to protect and treasure the county's landscape and people and do not be swayed by so called ongoing investment and economic development benefits during the construction and operational lifespan of wind farms.

Leitrim County Council, we trust you to implement a County Development Plan that protects our Lovely Leitrim and in doing so protects our tourism industry and so much more.

We respectfully ask for the future, that the 2023 - 2029 County Development Plan be strictly adhered to.