Irish Wildlife Trust Policy Statement on Wind Energy and Wind Farms 2014



Scope

This policy statement sets out the Irish Wildlife Trust's (IWT) position in relation to wind energy production and wind farms in Ireland.

Background

The availability of energy is one of the most vital requirements for society. In recent decades, the demand for energy across the globe has increased exponentially. To date, fossil fuels (oil, gas, peat, coal) have been the chief providers of cheap energy. However, these resources are limited and the use of fossil fuels is resulting in changes to the Earth's climate. The current consensus amongst many climate scientists is that these changes in the Earth's climate are beyond what would be expected within the natural cycles of the Earth and that human activity is responsible.

The IWT recognises that climate change is one of the most serious challenges facing nature conservation in the 21st century. It has the potential to seriously affect biodiversity in Ireland and around the globe. We therefore consider that clean energy production is vital for current and future generations and that wind has a significant part to play in this.

Targets for each EU member state have been made under the EU Directive 2009/28/EC: *"On the Promotion of the Use of Energy from Renewable Resources".* In the case of Ireland, a non-legally binding target requires that at least 40% of our electricity comes from renewable energy by 2020. The leading binding target for renewable energy is 16% by 2020. This Directive also outlines methods by which member states can assist each other to achieve these targets. Due to Ireland's location, there is a huge renewable energy potential, meaning that Ireland could become an exporter of renewable energy within the next decade. The Government has recognised this potential and this is

described in the document *Strategy for Renewable Energy 2012 – 2020.* This document states that there are "market possibilities for onshore wind projects of significant scale, which may in time offer the potential for the development of export to the UK market directly from the island of Ireland."

It is evident that in future years, the landscape of Ireland may be altered significantly to allow the development of these onshore windfarms. While the IWT supports the development of clean renewable energy, it is critical that windfarms are situated appropriately and not conflict with other environmental objectives, notably nature conservation. Therefore, the IWT would like to outline the following policy objectives in relation to the future development of wind farms in Ireland.

Policy Objectives

- All plans and programmes should be subject to a rigorous and transparent assessment under the Strategic Environmental Assessment (SEA) process and the Appropriate Assessment (AA) process, as outlined under Articles 6 of the Habitats Directive.
- The IWT would be opposed to any windfarm developments that may impact upon areas designated as a Special Area of Conservation (SAC), Special Protection Area (SPA), Natural Heritage Area (NHA) or proposed Natural Heritage Area (pNHA).
- The IWT would also be opposed to any windfarm developments that may impact upon species protected under the EU Habitats Directive, the EU Birds Directive or the Irish Wildlife Act.
- Any impacts on water quality should also be assessed as part of the Environmental Impact Assessment.
- Environmental Impact Assessments and Appropriate Assessments conducted as part of the planning process should not be concluded until adequate information on all habitats and species is gathered, whether they be in protected areas of not. There should be sufficient baseline data collected to make a comprehensive assessment of any potential impacts and to provide proper mitigation measures where necessary.
- The construction of windfarms on intact areas of peatland (raised or blanket bog) must be avoided. There must be no negative impact upon existing carbon stores.

- Any infrastructural developments related to the development of windfarms, e.g., road widening resulting in hedgerow removal, underground cable laying and access road construction, must also be examined as part of the Environmental Impact Study. The destruction of local ecological corridors should be avoided.
- The construction of wind farms by the private sector needs to take place within the context of a national strategy on wind energy. At the pre-planning stage environmentally sensitive areas should be ruled out. This could be done through County Development Plans.
- Offshore wind farms bring with them unique potential impacts to the marine environment. These must be fully understood and adequately mitigated for before and during such projects.
- The IWT feels that the priority use of cutaway peatlands owned by the state should be for conservation and habitat restoration, however, where wind turbines are proposed for cutaway sites we strongly encourage the integration of biodiversity aims through the natural regeneration of the surrounding lands.
- Local Authorities should undertake a land use assessment prior to any further granting of planning consent for wind turbines. Stakeholders including the IWT should be invited to take part in the scoping of such a study.

The IWT encourages people to engage with the planning process to ensure that all environmental assessments are carried out in a methodical, transparent and thorough manner.