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County Laois

Ireland

Mr Matthew Grant

European Electricity Transmission

9 Millbank, London, UK

SW1P 3GE.

14th January 2014

Re: Regulation of transmission connecting non-GB generation to the GB electricity transmission system

I [REDACTED] as a resident of County Laois in the Republic of Ireland make this submission in my capacity as a stakeholder in any project that has the capacity to directly affect my rights, my environment, my health, or my asset value. I am an ordinary member of the public, with no vested interest in the proposed development of energy trading between the UK and the Republic of Ireland.

1. The only option open to this export policy at the moment, given the time constraints involved is the POINT to Point option - . The companies involved in Ireland have no connection agreements with the Irish grid, only agreements to link to the UK national grid. Problems associated with this are manifold, not least being the de-coupling necessity; i.e. generators cannot also control the transmission system. OFGEM talks of getting around this by allowing through legislation, at national level and through the EU energy commission, to grant exemptions on specific projects. The rules for exemptions are obviously complex, made more so by the fact that different criteria exists on all inter-connectors, depending on whether it is between member states, or 1 member state and a non-member state of the EU. The UK has flagged that it is holding a referendum in the near future as to whether it will remain within the EU, and pending the outcome of that referendum, I would suggest that NO agreements or discussions can or should take place between Ireland and the UK around export/import of energy, because as it stands, we or you do not know the criteria that can be used in approach to such legislation.

2. In the event of these projects progressing beyond this stage, we as Irish citizens, who will have to bear the infrastructure imposed on our environment and all the attendant risks, demand that we, at the very least, be afforded the same protection and consultation rights as are available to UK citizens under UK law. We also demand that our rights under the Aarhus Convention be strictly observed: the right to participation at a point before any decisions are made.

3. We, as citizens of the Republic of Ireland are protected by our constitution, article 10 of which states that all means of power production, including the air above us, belongs to the Irish people, and can only be used for the benefit of all the people of Ireland. It is hard to marry this to the proposal as laid out by this proposal. Nowhere does it say that the UK is part of this package, nor does it state that the benefits should go to a small group of landowners and international corporations. We shall be seeking clarification of our constitutional rights through the Irish courts and EU courts, and would suggest that a referendum would be necessary to change the Irish constitution to allow what is proposed to take place.

4. Because the infrastructure will be wholly funded by the UK citizens, in the form of subsidies on their power bills. We would imagine that the UK has a duty of care to protect its citizen's assets. These assets are in a foreign sovereign nation, and so would be quite difficult to police and protect. What lengths would the UK be prepared to go to ensure that its infrastructure is protected? The 'Suez Canal' crisis is a stark reminder of how these things tend to work out. Ireland claims a policy of Neutrality internationally, The UK is a recognised target for various terrorist groups, and we wonder how UK strategic infrastructure could be protected in a foreign country, who has responsibility, and indeed who will bear the costs of such security?

Relations between the UK and Ireland have improved immensely over the last decade or more, but any good done, could be very easily undone by any attempt by the UK to export its commitment to a flawed renewable policy to a neighbouring country with an equally flawed renewable policy. There is huge opposition to these proposals at grass root levels in this country. Trust in our government's handling of this policy has evaporated. We would suggest that the UK does the right thing, and stop this madness before it results in large scale bad feeling and unrest, both in Ireland and the UK.

5. There are 21 Questions given as headings for this consultation and not one includes the "host communities for the renewable energy generation". There is significant resistance in the Midlands of Ireland to becoming an off-shore wind farm for the UK and this resistance is growing on an on-going basis making the possibility of wind farms being commissioned to meet the UK 2020 deadline unrealistic. It is now likely that legal challenges will be made against Bord na Mona, Element Power and Mainstream Renewables at every step of the way causing long delays in the planning process.

6. Has a cost benefit analysis been completed that shows that Ireland has the capacity

to produce renewable energy of the scale required by the UK to make this project feasible?

7. The consultation period of 8 weeks seems short considering that the Christmas period fell in between.

8. If "wind farms" are to contribute the bulk of the renewable energy then the EU Florence Convention and the impact of the scale of this project on Irish Landscapes would need to be considered.

9. The health concerns for children/adults with special needs (including autism) should be considered in relation to the development of wind-farms in the Midlands of Ireland. Where will the ultimate responsibility lie if the midlands wind-farms have an adverse effect on the above groups – the UK or Irish government?

10. Where I live is in full view of the Slieve Bloom Mountains is considered an area of Outstanding Natural Beauty, and is visited by thousands of tourists every year, primarily to walk in the mountains and enjoy the views of the surrounding countryside. What impact and devastation would this proposal have on the surrounding landscape and level of tourism to the area? We are also most fortunate to have 13 pairs of Hen Harrier nest in the mountains close to us. Each pair has bred successfully in the past season (unlike all of the Hen Harriers in England, not one of which had young) what would be the consequences for these Protected Birds of Prey if these giant Industrial Wind Turbines (185 metres) where to be erected in such close proximity to their nesting sites and range of feeding?

Yours Sincerely,

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