

European Platform Against Windfarms

To: OXGEM.
Consultation.

Regarding: Plans by Greenlink/Element Power to install industrial wind farms in the Irish Midlands for export to the United Kingdom.
Submission on behalf of European Platform Against Wind Farms, Irish Section.

There is great confusion as to whom the company proposing this is and what name it is being proposed under. I understand it is Greenlink/Element Power. If I am incorrect, I mean this to refer to the plan to export wind energy mixed with Irish fossil fuel energy for export to the UK.

We recommend that the UK government should have no truck with this project for the reasons stated hereunder.

1) The European and Irish wind energy programme is an economic bubble which will burst if not checked and halted. <https://www.youtube.com/watch?v=waWYb5xGOaM>

2) The Strategic Environmental Assessments legally required under EU SEA Directive 2001/42/EC has been passed in respect to EU renewable energy directive 2009/28/EC at the level of the European Union.
<http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

The Strategic Environmental Assessment Directive has been passed at the level of the Irish government and at the level of the UK government both of whom are legally obliged to comply with the Directive in relation to all public plans and programmes which are likely to have a significant impact on the environment. This Directive is fully implemented in the UK in regard to town and country planning and there is a lot of existing case law already in existence about it. The Irish National Renewable Energy Action Plan drawn up in 2009 set in place the Renewable Energy Feed in Tariff (REFIT) which subsidises wind energy in Ireland. This plan was never assessed in any way.

3) The United Nations Economic Commission for Europe (UNECE), had ruled that the EU, UK and Ireland are in breach of their legal obligations under Article 7 of the Aarhus Convention to Public Participation, Access to Information and Access to the courts on environmental matters in relation to

the NREAP. Traditionally, when government introduces a law, it ensures it is enforced and provides the resources to enforce it. With energy, governments refuse to enforce it and try to avoid doing so. It like if a persons car was stolen and the owner had to sue the police to investigate.

4) All existing wind farms in Ireland may be operating without proper planning authority. At the Oral hearing into the Emlagh wind farm near Kells Co. Meath earlier this year, I asked a representative from the Element Power Company why there was no SEA in respect of NREAP. Their representative replied that it did not require an SEA. He said the 46 turbine wind farm was a project and while he accepted the wind farm would be financed through the REFIT scheme, it was a project and was not subject to the SEA Directive. This is not true, there is no SEA for any of the wind farms in Ireland.

5) This project, is to export to the UK and the SEA for it will be covered by the “trans-boundary” provisions of the SEA Directive and may require one in the UK and in Ireland. You will already know about the Espoo Convention.

6) Expected capacity factors in Ireland are published by Eirgrid, the company responsibility for electricity transmission. In their 2010 – 2016 adequacy report, 2010 – 2016
<http://www.eirgrid.com/media/Generation%20Adequacy%20Report%202010-2016.pdf>

they give historic capacity factors as follows at page 40 figure 4.5.

2002	34.1%
2003	34.7%
2004	33.4%
2005	32.5%
2006	31.4 %
2007	29.1%
2008	31.7%

During 2008 and 2009 I measured Irish wind speeds adjusted for average turbine height. I referred the Met Eireann's (Irish met Office's) wind rose 1971 to 2001. I arrived at a figure of 24.1%. Professor Gordon Hughes of Edinburgh University carried out studies called The Performance of Wind Farms in Denmark and the UK <http://www.ref.org.uk/attachments/article/280/ref.hughes.19.12.12.pdf>. He arrives at a capacity factor of 24% remarkably close to my figure.

You need to realise that Eirgrid are overstating the capacity factors for these years. As a resident of Ireland I can say that wind speeds in these years were no higher than in the years I measured them or when Professor Hughes measured them. I wrote to the CEO of Eirgrid Dermott Byrne and he wrote back accepting that the capacity factors given had not be achieved in 2008, 2009 or 2010 and accepted that there was a problem. I have no idea where Eirgrid got their figures, but I can say that in Ireland they range between 17% and 27%. Factors in the Irish Midlands can be expected at no better than 22% and In my opinion you will be lucky to get 20% in the Irish Midlands.

7) When this project was mooted at first, the claim was that raw wind energy would be exported from Ireland to the UK via a HVDC interconnector. This would mean that you would be getting erratic variable direct current wind energy. This would be useless. This new plan is to feed the wind energy into the Irish National Grid System where it will be mixed with fossil fuel generated high quality electric power and to export that as a product.

8) Wind generated electricity as the following attributes:

- ⑩ It's non-synchronous power which must be inverted on reaching your shore.
- ⑩ In Ireland it will not displace base load fossil fuel generation. 46% of demand.
- ⑩ In the UK it will not displace base load fossil fuel generation. 46% of demand.
- ⑩ It cannot be used on its own.
- ⑩ All existing generating capacity must be maintained, none can be shut down.
- ⑩ Fast acting fossil fuel generation plant in equal amounts to wind must be installed to back up wind energy. This is needed to balance wind energy.
- ⑩ In Ireland, the consumers pay for all back up plant, additional administration costs, additional transmission costs and the cost of subsidies. This is the same as if a business had all its cost of sales (excluding repair and maintenance) paid for by someone else.
- ⑩ Existing Irish electricity prices are the 3rd highest in the world, they increased 5.08% in the first 6 months of 2015 for domestic consumers at a time when the price of fuel decreased dramatically. No reduction is expected due to forward purchase of fuel on the derivatives market. The high cost due to wind energy.
- ⑩ If this project goes ahead, Irish Consumers will be subsidising UK consumers. When the Irish people and their government realise this, they are likely to re-visit the subsidy scheme agreed. If contracts cannot be changed, taxation may be used to re-coup the money lost.
- ⑩ In 2005, commercial rates for wind farms were trebled. The rate is in the region of 7,000 Euros per mega watt installed.
- ⑩ Experience world wide is that the capacity factor for wind farms decreased with age and larger wind turbines are experiencing gear box problems. Most turbines have a step up gearbox which is inherently weak due to the high strains involved. This is the opposite to a car gearbox. Heavy steel gear wheels absorb too much energy due to their inertia and efforts to make gears of lighter materials have been unsuccessful. Turbines are breaking down after at little as 3 years. One in Co. Wexford cost 600,000 to repair.
- ⑩ The business model of most wind energy companies is to install, commission and sell immediately. This conduct is indicative to an economic bubble. Eddie O'Connor of Mainstream Renewable power described wind energy as a cash cow and recently said that Ireland's 37% renewable target was unachievable.
- ⑩ There is no recognised way to measure the contribution of wind on and grid system. I claim that wind's contribution at high levels is close to zero and may be negative.

The ESB were responsible for Ireland electric generation, distribution and financial control prior to part of their task been transferred to Eirgrid. They have wide experience in the business. In their 2004 report entitled : Impact of Wind Power Generation in Ireland on the Operation of Conventional Plant and the Economic Implications.

[http://www.eirgrid.com/media/2004%20wind%20impact%20report%20\(for%20updated%202007%20r](http://www.eirgrid.com/media/2004%20wind%20impact%20report%20(for%20updated%202007%20r)

eport,%20see%20above).pdf

At page 24, paragraph 2, they report about the relationship between wind farm's capacity factor and capacity credit (actual contribution) as follows:

⑩ However, it is an unfortunate fact that the contribution to adequacy of additional amounts of wind decreases progressively and tends towards zero. Consequently, the incremental capacity credit of increasing WPG tends to zero.

This means that as wind penetration increases, the contribution decreases and falls to zero. It is no good whatsoever.

In the Irish Sunday Newspaper “The Sunday Business Post” 23rd August, 2015 on the front page is a report that Irish electricity prices are to jump. Public opinion is coming round to to accept that wind energy is a scam and that there is a cabal in the Irish establishment to keep this bubble going.

UCD economist Colm McCarthy, a highly respected senior economist has written several articles warning about the an energy bubble and overcapacity.

Capacity in the Republic

Conventional capacity	6,000 mw	coal peat and gas
Hydro	200mw	
Wind	2,200 mw	
Fast acting back up plant	2,000 mw.	

Total	10,400mw	
Historic peak demand	4,952 mw	

9) Ireland has massive over capacity.

At the Energy 5 work shop in the Chester Beattie Library in Dublin Castle on the 3rd December, 2014, Mark O'Malley an Engineer with a Dublin university said he was an advisor to the Irish government and he accepted that wind energy is limited to 50% of demand and when I asked him how he could justify more wind energy, he replied that they were working on it and that he believed they would manage to rise the the limit to 70%. He could not explain why Irish engineers could achieve what others world wide had failed to achieve.

Industrial wind energy and the cabling to carry it is hugely unpopular in rural Ireland. I have worked very hard to fuel resistance and to educate the general public. All planning applications are fiercely resisted and you need to watch for the result or the Emlagh wind farm, in County Meath due out soon. This was originally intended for export to the UK. Residents are entitled to a protective costs order to fight judicial reviews against the grant of planning permission.

EU renewable policy is ridiculous. Combating alleged man made global warming cost the world 1.5

trillion dollars per year.

<http://www.telegraph.co.uk/news/worldnews/europe/eu/7867422/The-EUs-response-to-global-warming-is-a-costly-mistake.html>

The effect of the introduction of wind energy into rural Ireland has been to split communities up. These communities have live in cooperation with their neighbours for decades and centuries. Helping at peat cutting, hay making, harvest, threshing of corn, barn dances and socialising. Now there is open war between people who realise this is a destructive useless bird killing delusion and those who are not very clever and easily lead.

A farmer with 100 acres of land in Ireland would be lucky to bring in an annual income of a teacher, police man or Truck driver. In some cases they would be lucky to get half their pay. One industrial wind turbine can bring 12,000 to 18,000 Euros depending of size and location. A farmer with just three large turbines could net 54,000 Euros annually. There are plans to install another 3,000 mw of wind farms, so if no fossil fuel plant can be turned off, who will pay hundreds of landowners 54,000 Euros each? It has to all go on bills.

10) Export plan.

Britain does not want raw wind electricity, its has no value. They pulled the plug on the earlier memorandum of understanding signed by Pat Rabbitte, Minister for Energy. Now the developers have persuaded the corrupt Irish government that their raw wind energy should be fed into the Irish grid system with them getting paid a premium above the rate paid for by Britain. Only a small minority of that electricity will be wind while the majority will be generated by fossil fuel in Ireland. All of this back up generation will be loaded onto the consumer. Wind has to get capacity payments which in 2013 averages out at 26 million Euros for about 1,700 mw of wind. They will have to get a guaranteed price of about 80 euros per mwh. They will have to get co2 payments and they get massive capital depreciation tax breaks all to be paid for by the Irish consumer and Irish taxpayer in forgone tax revenue.

Commercial rates.

The rates were trebled recently as local county councils decided to cash in on the wind bonanza. They are charging about 6,700 euors per mega watt installed. There are complaints from wind companies. This means that while government and consumers promote wind energy local authorities tax it. So there is a conflict of policy among state agencies.

11) Irish Semi State bodies failing to comply with the Aarhus Convention.

If any person submits an Access to Information Request under the Irish transposition of the Aarhus Convention, they may get a response from the public body concerned. I have got a lot of information but was refused more. I was refused information of the results of data from wind measuring masts put up by private wind companies. They claim a certain expected output to planning authorities as part of their environmental impact statement. But the planning authorities refuse to give this information to members of the public. One can appeal by way of an internal review by a person of higher rank within that organisation. If the information is still refused or is inadequate, the next recourse is to appeal to the Information Ombudsman. It all ends there, the Ombudsman will not do any investigation claiming there are inadequate staff to investigate. This frustrates the entire purpose of the Convention and effectively means that the Irish government can select the information it allows out to the public. If they don't want to give it, they just refuse safe in the knowledge that the Ombudsman's office will not rule against them.

In the attaches link is a case in point. Coillte is the Irish forestry board, a semi state body. They hold 7% of the land of Ireland, some of which is good land with forestry. In this case they failed to allow consultation on the sale of a large estate in County Tipperary.

Click into "Communication of the 26th April, 2015, at the top of the page and read the letter from John and Mary Redmond.

See letter of the 6th September 2015 from John and Mary Redmond.

Coillte is now widening its net into wind energy with government approval in competition with Bord Na Mona (Peat extraction Board) and the Electricity Supply Board (ESB). The notion of three Irish semi state companies are in competition with each other and with private wind companies indicates just how far down the road to a bubble Ireland has become and how the government is actively denying its citizens their rights under international law, on wind energy adventures

<http://www.unece.org/environmental-policy/conventions/public-participation/aarhus-convention/tfwg/envppcc/envppcccompilation-findings/preacccc2015129-ireland.html>

13) Health.

I personally know of two couples who have been forced to leave their home due to the noise. One in County Limerick and one in County Roscommon. I know of others who are unable to sleep.

<https://www.youtube.com/watch?v=8sKgFNNTRkI>

http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Wind_Turbines/Wind_Turbines/Final_Report

I personally heard Minister for Energy Alex White say at the opening of the Mount Lucas wind farm on the 2nd March, 2015, that he would introduce set back distances between industrial wind turbines and

homes. He promised that he would introduce new guidelines soon. It's now September and there is no sign of any guidelines. The present distance is set by the 2006 guidelines @ 500 meters. In that time, the height of turbines has doubled.

Summary.

The British government should realise that when it comes to mains electricity generation in Ireland, the information emanating for official, vested interest and Semi-state bodies is more akin to the mad hatter's tea party than reality. They are deluded, obsessed with useless wind energy. Our government is corrupt. Under present EU rules the credit for renewable generation for cpo2 abatement will go to Ireland, but of course they will probably bend the rules here too. The Irish Academy of Engineers have tried to halt it, so had Irish respected Colm McCarthy.

If the British side have any sense, they will not just walk away from this, they will run away from it.

During the next few winters, Britain is facing blackouts, Ireland has adequate capacity, but electricity is fast becoming a luxury. Terrible hardship awaits the poorer people. The old saying goes, you can fool all the people some of the time, some of the people all the time but you cannot fool all of the people all of the time. A person with oil fired central heating cannot use it without electricity to drive the pump.

Wind energy is unwanted, uneconomic, unhealthy, unreliable and un-assessed. An Irish bad joke.

References:

These are my own videos.

<https://www.youtube.com/user/ValMartinIreland>

<http://www.epaw.org/>

[http://www.eirgrid.com/media/2004%20wind%20impact%20report%20\(for%20updated%202007%20report,%20see%20above\).pdf](http://www.eirgrid.com/media/2004%20wind%20impact%20report%20(for%20updated%202007%20report,%20see%20above).pdf) page 24, paragraph 2.

<http://www.ref.org.uk/attachments/article/280/ref.hughes.19.12.12.pdf>

<http://www.strata.org/wp-content/uploads/2015/07/Full-Report-True-Cost-of-Wind1.pdf>

<https://www.wind-watch.org/documents/eon-netz-wind-report-2005/>

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<http://irishenergyblog.blogspot.ie/>

<http://epaw.org/>

<https://www.youtube.com/user/ValMartinIreland>