



Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive



## **Submission on Draft Renewable Electricity Policy and Development Framework**

### **HSE Public Health Medicine Environment and Health Group**

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## Submission Summary

The HSE Public Health Medicine Environment & Health Group welcomes the Renewable Electricity Policy and Development Framework. Strategic Environmental Assessment should consider any potential impacts of renewable energy developments on human health and wellbeing. Appropriate setback distances from existing dwellings may mitigate the potential impacts of large scale wind energy developments. Meaningful community engagement and consultation is required to increase public acceptance of these developments.

The HSE Public Health Medicine Environment & Health Group (PHMEH Group) members carry out the HSE Public Health function within HSE Departments of Public Health under Medical Officer of Health legislation<sup>1</sup> in relation to the environment. Our role includes the protection and improvement of the health of the public through identification and control of environmental influences on health.

All public policies should acknowledge the links between health and wellbeing and social, economic, and environmental factors. The impact of energy policy on health is increasingly recognised by health, energy, climate and environment stakeholders around the world.

Ireland relies heavily on fossil fuels and has a high import dependence for all fuels. Diminishing supplies of oil and gas in the EU and OECD will impact on Irish energy security. Ireland is facing significant challenges in meeting its future emissions targets for greenhouse gases under the EU Climate and Energy package for 2020 and the more recently adopted targets for the year 2030. Ireland needs to meet its needs for sustainable, renewable energy in a way that is acceptable to the public. Wind energy is the largest contributor to renewable electricity generation in Ireland.

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<sup>1</sup> Health (Duties of Officers) Order, 1949. Available at: <http://www.irishstatutebook.ie/eli/1949/si/128/made/en/print>

In recent years it has become increasingly common for members of the public and community groups to contact Departments of Public Health in relation to their concerns regarding planning applications for wind farms and their potential impact on public health. Wind farms generate considerable anxiety and concern amongst individuals and communities. Overall, scientific evidence of adverse impacts on health is weak or absent. However, many studies of wind turbines and health have limitations and it may well be that our understanding of types of noise and types of sleep disturbance is not comprehensive. Anxiety and annoyance in itself, may lead to reduced quality of life and stress related health effects. International experience with uncertainty in environment and health issues such as this advocates a precautionary approach. We therefore welcome this Policy and Development Framework, which will set out national policy in relation to environmental considerations, community engagement and the potential future export of renewable electricity.

## **Environment**

We welcome the formal, systematic evaluation of the likely environmental impacts of the Renewable Electricity Policy and Development Framework, which includes effects on human health. Ireland's dispersed pattern of rural settlement presents a particular challenge in setting wind farm setback distances which are acceptable to local communities. Noise, shadow flicker and construction impacts are important considerations in relation to human health. Although increasing the recommended setback distance reduces the land area available for new wind farm development, an increased setback distance for large scale projects may be more acceptable to the public. Potential effects of large scale developments on drinking water sources also require assessment.

## **Community Engagement**

Early, meaningful consultation with local communities is required in relation to any proposed new wind energy developments. We support the approach described in the report “Wind Energy in Ireland: Building Community Engagement and Social Support” published by the National Economic and Social Council. We concur that participatory processes of community engagement are required in relation to wind energy developments.