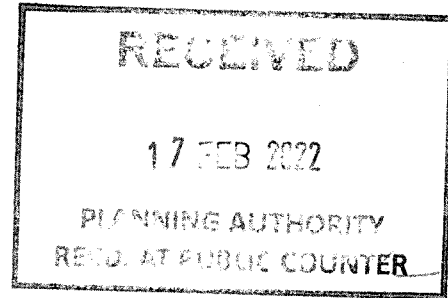


# Kerry County Development Plan 2022 - 2028

## Submission

**For the attention of:**  
Mr. Damien Ginty (Senior Planner),  
Planning Policy Unit,  
Kerry County Council,  
Rathass, Tralee,  
Co. Kerry  
V92H7BT



To whom it may concern,

I acknowledge the call for submissions to the Kerry County Development Plan 2022 - 2028.

I submit to you the following observations for consideration regarding the new County Development Plan 2022 - 2028.

**I am a resident concerned with elements of Chapter 12- Energy Section and in particular the following which is contained within the chapter:**

1. **The area up for Further Assessment which is marked as Area 18 in Appendices map 6.46.**
  2. **The zoning of the Scartaglin Region for open consideration to the development of wind farms. (Blue Region in Development Map).**
  3. **The zoning of existing wind farms within the Scartaglin region for repowering. (Red Region in Development Map)**
- 
- ❖ The **visual sensitivity** of wind turbines is not suitable to the area and not in keeping with its surroundings and would seriously injure the amenity of the area, as well as negatively impact the **value of local residents properties** which they have built up over many years and generations. Considering the regulations surrounding the building of houses in rural areas and the visual effect and landscape impact which have to be taken into consideration, it makes absolutely no sense to allow turbines (which are up to 200 metres in height) to be constructed in areas which near dwellings of people which have a negative impact on both humans and wildlife.
  - ❖ The **noise & shadow flicker** generated by turbines is not suitable for residential areas. Consideration must be given to residential areas where occupants, and future occupants, may have learning difficulties or sensory issues as this has been proven to be detrimental. **Anxiety, depression and the disturbance of people's sleep** have all been linked to many cases where people are living within close proximity to wind turbines. Therefore, are not suitable to the areas which have been included in Area 18 of the maps which have been marked for further assessment or area of wind zoning potential.
  - ❖ The destruction of **Flora and Fauna** (Plants and wildlife) to the Scartaglin region will be immense. The County Development Plan must take action to protect the flora and fauna of the region and provide public services to record the wildlife affected. Killarney is part of the UNESCO biosphere reserve and the county development plan is an immediate opportunity to show progress in this regard.

- ❖ Consideration must be given to the increased risk posed by the construction of large turbines. Roads that are not suitable for large vehicles, occupants in the area are at risk of turbine collapse, noise pollution, seasonal wildlife impact etc. **Local roads and infrastructure cannot be allowed to be destroyed in the construction of turbine developments.** If you travel the local roads, you will see that they are already in relatively poor condition in a lot of the area which is marked for further assessment in Area 18. Roads are very much prone to sinkage in the area due to the land where the roads are built being **marshy and boggy in nature.** This is as a result of everyday use by local lorries and farm machinery, which would not be to any where near the scale of destruction which would be caused as a result of constructing turbines in the area.
- ❖ Consideration must be given particularly to the area in the southwest of the area 18 marked for further assessment which includes townlands of Kilsarkan East, Glanlea, Knockacorrin and Anablaha where **peatland is located on steep sloping hills which would not be suitable for turbines due to the possible dangers of bog slides as well as displacing flora and fauna.** Bog land has been reclaimed in this area into grassland in recent years and this should be taken into consideration during any assessment of the area. Bogland has been marked out in the Kerry Biosphere Reserve Map 11.2 which is adjacent to this part of area 18 which has been marked for further assessment.
- ❖ The destruction of water and carbon reservoirs will also be detrimental to the locality. The development plan must take action to protect the bogs and waterways of Kerry. There are many streams and rivers connected to both the Brown Flesk River (tributary to the River Maine) and the Blackwater River in the area for further assessment and area for wind zoning potential within Area 18 of map 6.45 The Blackwater River is adjacent to all the regions highlighted for wind farm zoning in the Scartaglin region. **The Blackwater River is also a Special Area of Conservation for the Freshwater Pearl Mussel as well as the rare Kerry slug.** Kilsarkan, Knockacorrin, Ballahantouragh, Knockeenahone, Barna and Knockrour regions are all directly located within a 1km radius of Brown Flesk River or its tributaries and within 10km of the Blackwater River and should be excluded from inclusion in any open consideration for wind farm development zone.
- ❖
- ❖ **Scartaglin contains vast areas designated as Special Areas of Conservation for the Hen Harrier.** Knockeenahone is one of the regions currently being zoned as open to consideration for wind farm development, yet contains specific areas of conservation marked clearly in the Hen Harrier SPA Habitat Map. Barna and Knockrour regions are both located within a 1km radius of these special zones of conservation and all regions should be excluded from inclusion in any open consideration for wind farm development zone and for repowering of existing turbines. A 250m buffer zone for the Hen Harrier outside the specific designated areas of conservation is also entirely unacceptable.
- ❖ **Barna Bog is a known roosting and nesting site for Hen Harrier *Circus cyaneus*, an Annex I bird species protected under the Bird's Directive (Directive 2009/147/EC).** The bog is one of the most important roosting sites for the species in Ireland with as many as 21 Hen Harriers recorded roosting at the site in 2021 by IRD Duhallow Ecologists (Mike O'Connor pers comm.). Due to Barna Bog's close proximity to the Stack's to Mullaghereik Mountains, West Limerick Hills and Mount Eagle SPA, this winter roost site is crucial for the SPA to meet its conservation objectives.
- ❖ **As well as the Hen Harrier, Barna Bog provides an important habitat for several other species of conservation interest including the liverwort species *Pallavicinia lyellii*, a Flora Protection Order (2015) Plant (Rory Hodds pers. comm.).** There is also suitable habitat for the butterfly species Marsh Fritillary *Euphydryas aurinia*, which is protected under Annex II of the Habitats Directive (Barron, 2020).

- / - /
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Name (PRINT): DIARMUID DALY

Redacted – Personal Information

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Name (PRINT): SUSANN O'SULLIVAN DALY

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Name (PRINT): HELEN SHEAHAN

Redacted – Personal Information

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Name (PRINT): .. CONOR SHEAHAN

Redacted – Personal Information

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Name (PRINT): NIALL SHEAHAN

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Name (PRINT):

DAN CRADLEY

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Name (PRINT):

DAVE CROWLEY

# Redacted – Personal Information

1-8

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Name (PRINT): Thade MERLIHAY KATE MERLIHAY

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Name (PRINT):

KATE HERLIHY

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Name (PRINT):

P. J. W. W. W.

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Name (PRINT): ORLA STEWART LUCEY

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Name (PRINT): HANNA O'Sullivan

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Name (PRINT): KATHLEEN CASEY

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1-14

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Name (PRINT): THOMAS O SULLIVAN

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1-15

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Name (PRINT): PATRICK O SULLIVAN

Redacted – Personal Information

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Name (PRINT): Adelen O'Sullivan.

Redacted – Personal Information

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Name (PRINT):   Jerry Horgan  

Redacted – Personal Information

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Name (PRINT):

NEILY CROWIN

Redacted – Personal Information

1-79

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Name (PRINT): MARY CROWIN

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Name (PRINT):

JAMES DALY

Redacted – Personal Information

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Name (PRINT): OLIVIA FITZGERALD

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Name (PRINT): MAURICE BROSNAH

Redacted – Personal Information



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Name (PRINT): MARY O SULLIVAN

1-24

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Name (PRINT):

DANNY O SULLIVAN

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Name (PRINT): AIDAN O SULLIVAN

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Name (PRINT):

ALEX PAVINCIC

Redacted – Personal Information

1-27

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Name (PRINT): PAWEL WINSKI

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Name (PRINT): ARTUR JAN STANKOWSKI

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Name (PRINT): KATHLEEN O'CONNOR

Redacted – Personal Information

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Name (PRINT): Hughie Donoghue

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Name (PRINT):

JOHN O'CONNOR

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Name (PRINT): MARIAN O CONNOR

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Name (PRINT): PAUL LAHILL

Redacted – Personal Information

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Name (PRINT): BRIAN CAHILL

Redacted – Personal Information

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Name (PRINT):

Kathleen Cahill

Redacted – Personal Information

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Name (PRINT): DANDIE CAHILL

Redacted – Personal Information

1-37

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Name (PRINT):

Myles O. Donoghue

Redacted – Personal Information

1-38

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Name (PRINT): Noel HEALY

Redacted – Personal Information



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Name (PRINT): MARTINA LYNE HEALY

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Name (PRINT): JOHN GORMAN

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Name (PRINT): TIM LINEHAN

Redacted – Personal Information

1-42

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Name (PRINT): MAURA FLEMING

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Name (PRINT): SHANE POWER

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Name (PRINT): ELAINE POWER

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Name (PRINT):

MARTIN FLEMING

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Name (PRINT): JULIE GREEN

Redacted – Personal Information



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Name (PRINT): JULIE BRODAN MURPHY

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Name (PRINT): Daniel Murphy

Redacted – Personal Information

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Name (PRINT): ABBIE CRONIN

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Name (PRINT): JERRY CRONIN

Redacted – Personal Information

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- ❖ The proximity of turbines to boundaries should be a minimum of ten times the blade tip height, as is common in many countries. The development plan must recognise the scale increase of a modern turbine since 2006, where modern turbines are now reaching heights of 200m blade tip height.
- ❖ Kerry has sacrificed enough for the national renewable energy target. **Kerry's land mass of 6.8% currently contributes 18%-22% of national wind turbine energy.** For example, Kerry contributes 609MW and Galway contributes 326MW (8.6% land mass), Clare 152MW (4.9% land mass), Limerick 199MW (3.9% land mass). Those three counties combined barely contribute (68MW (10% in the difference) more than Kerry. The plan must consider the sacrifice imposed on residents.
- ❖ The county plan must consider the economic and population changes of large developments within residential areas. The county development plan must also consider impact to rented housing. **It is more difficult to rent a house with additional construction traffic and residential development and habitation in the region of Scartaglin would disintegrate massively due to the visual and noise impact of turbines.**
- ❖ The industrial wind turbine is **too big and too close** to residential areas within the Scartaglin region to be considered viable and the area which is marked for further assessment. These regions should be excluded for prospective zoning for open consideration to wind farm development within the Kerry County Development Plan 2022 - 2028. **I am not opposed to creating renewable energy sources, so long as it does not adversely impact on people's health, wellbeing, homes, neighbours, friends and communities which it will do if more turbines are added to this area in the Scartaglin region.**

Name (PRINT): BINA O LEARY

Redacted – Personal Information

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- ❖ The proximity of turbines to boundaries should be a minimum of ten times the blade tip height, as is common in many countries. The development plan must recognise the scale increase of a modern turbine since 2006, where modern turbines are now reaching heights of 200m blade tip height.
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Name (PRINT): GEAROID O' LEARY

Redacted – Personal Information

1-53

- ❖ Consideration must be given to towers and cabling infrastructure that will **'railroad'** through the county and Scartaglin region. They will not be in keeping with its surroundings and would seriously injure the amenity of the area.
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Name (PRINT):

PAT FOLLIOTT

Redacted – Personal Information

1-54

- ❖ Consideration must be given to towers and cabling infrastructure that will 'railroad' through the county and Scartaglin region. They will not be in keeping with its surroundings and would seriously injure the amenity of the area.
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Name (PRINT): DAN BUCKLEY

Redacted – Personal Information



1-55

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Name (PRINT): Ted O'Leary

Redacted – Personal Information

1-56

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Name (PRINT): CONOR MITCHELL

Redacted – Personal Information

1-57

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Name (PRINT): KATHLEEN O'Leary Crowley

Redacted – Personal Information

- ❖ Consideration must be given to towers and cabling infrastructure that will **'railroad'** through the county and Scartaglin region. They will not be in keeping with its surroundings and would seriously injure the amenity of the area.
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Name (PRINT): ANDREW BUCKLEY

Redacted – Personal Information

- ❖ Consideration must be given to towers and cabling infrastructure that will **'railroad'** through the county and Scartaglin region. They will not be in keeping with its surroundings and would seriously injure the amenity of the area.
- ❖ The proximity of turbines to boundaries should be a minimum of ten times the blade tip height, as is common in many countries. The development plan must recognise the scale increase of a modern turbine since 2006, where modern turbines are now reaching heights of 200m blade tip height.
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Name (PRINT): JERRY O LEARY

Redacted – Personal Information

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Name (PRINT):

MICHAEL O'LEARY

# Redacted – Personal Information

- Consideration must be given to towers and cabling infrastructure that will **traverse** through the county and Scartaglin regions. They will not be in keeping with its surroundings and would seriously reduce the amenity of the area.
- The proximity of turbines to boundaries should be a maximum of less than the blade tip height, as is common in many countries. The development plan must recognise the scale increase of a modern turbine since 2006, where modern turbines are now reaching heights of 200m blade tip height.
- Kerry has sacrificed enough for the national renewable energy target. **Kerry's land mass of 6.47% currently contributes 18% 22% of national wind turbine energy.** For example Kerry contributes 400MW and Galway contributes 320MW (8.6% land mass), Clare 172MW (4.9% land mass), Limerick 190MW (3.9% land mass). These three counties combined barely contribute 140MW (10%) in the difference) more than Kerry. The plan must consider the sacrifice imposed on residents.
- The county plan must consider the economic and population changes of large developments within residential areas. The county development plan must also consider impact to rental housing. **It is more difficult to rent a house with additional construction traffic and residential development and habitation in the region of Scartaglin would disintegrate massively due to the visual and noise impact of turbines.**
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Name (PRINT)

TON CANVOR

Redacted – Personal Information

1-62

- ❖ Consideration must be given to towers and cabling infrastructure that will **'railroad'** through the county and Scartaglin region. They will not be in keeping with its surroundings and would seriously injure the amenity of the area.
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Name (PRINT): Timmy Brosnan

Redacted – Personal Information



1-63

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Name (PRINT): MICHAEL CREMIN

Redacted – Personal Information

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Name (PRINT):

Angelo Cremin

# Redacted – Personal Information

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Name (PRINT):

SIOBHÁN DALY

Redacted – Personal Information

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Name (PRINT): JOHN O' SULLIVAN

Redacted – Personal Information

1-67

- ❖ Consideration must be given to towers and cabling infrastructure that will 'railroad' through the county and Scartaglin region. They will not be in keeping with its surroundings and would seriously injure the amenity of the area.
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Name (PRINT):

TED BUCKLEY

Redacted – Personal Information

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Name (PRINT): INA BUCKLEY

Redacted – Personal Information

1-69

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Name (PRINT): MAIRE Uí BHROLAIGHAIN

Redacted – Personal Information

1-70

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Name (PRINT): JAMES COFFEY

Redacted – Personal Information



1-71

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Name (PRINT): MARGARET COFFEY

Redacted – Personal Information

1-72

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Name (PRINT): CORNELIUS GALVIN

Redacted – Personal Information

1-73

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Name (PRINT): AIAM CASEY

Redacted – Personal Information

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Name (PRINT): KATHLEEN MCSWEENEY CASEY

Redacted – Personal Information

1-75

increase of a modern turbine since 2006, where modern turbines are now reaching heights of 200m blade tip height.

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Name (PRINT): WALTER COSTELLO

Redacted – Personal Information

1-76

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Name (PRINT): Pat O Sullivan

Redacted – Personal Information

1-77

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Name (PRINT): Danah M. Sweeney

Redacted – Personal Information

1-78

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Name (PRINT):

DENIS Mc SWEENEY

Redacted – Personal Information



1-79

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Name (PRINT): MAIKÉAD W' SWEENEY

Redacted – Personal Information

1-80

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Name (PRINT): DONNACHA MC SWEENEY

Redacted – Personal Information

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Name (PRINT):

BRIDIE GEANEY

Redacted – Personal Information

1-82

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Name (PRINT): JAMES GEANEY

Redacted – Personal Information

1-83

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Name (PRINT): ORLA KELLY

Redacted – Personal Information

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Name (PRINT): Eileen Sheehan

Redacted – Personal Information

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Name (PRINT):

MARY CARROLL

# Redacted – Personal Information

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Name (PRINT):

JOHN SHEEHAN

# Redacted – Personal Information



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Name (PRINT):

Jeremiah McElwan

Redacted – Personal Information

1-88

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Name (PRINT):

DAVID O'HEEHAN

Redacted – Personal Information

1-89

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Name (PRINT): MARIA KELLY

Redacted – Personal Information

1-90

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Name (PRINT): Bridget Culloty

Redacted – Personal Information

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Name (PRINT): SHEILA MCCARTHY

Redacted – Personal Information

1-92

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Name (PRINT):

DJ MCCARTHY

Redacted – Personal Information

1-93

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Name (PRINT):           TIM          KELLY          

Redacted – Personal Information

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Name (PRINT): DARINA SIWLEC

Redacted – Personal Information



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Name (PRINT):

MARGARET

HANIFIN

# Redacted – Personal Information

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Name (PRINT): KIERAN HANIFIN.

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Name (PRINT): SHEILA MCCARTHY

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Name (PRINT):

BRIOTE LEARY

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Name (PRINT): SHEILA BUCKLEY

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