# Courty Development Plan 2022

## Renewable Energy Zoning

The CDP fails to explain that the area zoned for "repowering" means that the current wind farms are zoned as suitable for renewal when their current 25 year life span ends and open to be replaced with taller turbines. This repowering zone includes the Stacks Mountains SPA. It fails to highlight that it is proposed in the draft CDP that KCC will entertain applications for current wind farms to be extended

The Board of an Bord Pleanala quotes KCC's planning zoning which identifies areas as suitable for wind farms as reasons for permitting applications for planning. On this basis, KCC zoning assists wind farms getting planning permission from ABP. It is likely that the repowering zoning will be quoted by ABP similarly.

The CDP states Kerry produces 18% of all wind electricity in the country, while having 6.8% of land mass and 3% of the population. This is over concentration of wind farms. The cumulative effect of wind farms in an area, especially in North Kerry, needs to be taken into account for any future development and for any application for extending, "repowering" or renewing.

This zoning needs to be immediately withdrawn.

Areas now zoned as not suitable for wind farms are stated to be subject to "Further Assessment." This would appear to leave these areas open to be zoned as suitable for wind farms in the future

## Landscape Character Assessment

The still applicable Landscape Character Assessment (2012) states that North and East Kerry's landscapes are not important for scenery, tourism or recreation and this is not mentioned in the CDP. This is current policy in KCC. It needs to be brought to the publics attention that KCC has been asked to change the LCA for many years and KCC has refused. It is unclear whether this LCA will continue or if it will be rescinded. It is not mentioned in this CDP.

The Landscape Character Assessment written by council in 2012 states that the majority of the landscapes of North Kerry are 'not important for scenery, tourism or recreation'. This statement contradicts the County Development plan stated aims to increase tourism into the whole of the county and to promote the Wild Atlantic Way as a holiday route for visitors to the area, both nationally and internationally, to explore and enjoy. The whole of the county needs to benefit from the promotion of Kerry as a viable tourism destination and therefore this LCA and related zoning need to be immediately withdrawn.

#### Battery Electrical Storage Systems (BESS)

Of the 200 BESS that have been permitted in the county, 199 are in North and East Kerry. There are no fire safety/evacuation procedure in Kerry for these fire/explosion prone installations.

23 5 May

#### **Biodiversity**

KCDP 11-12 "Support the sustainable use of wetlands, including our Ramsar sites, for educational, recreational and or tourism uses where appropriate and compatible with environmental protection designations."

11.2.3 "Wetlands "Wetlands have a valuable and beneficial role in flood regulation, water purification, wildlife habitat, and recreation. Wetlands include a wide range of habitats including swamps, marshes, peatlands, wet heath and inter-tidal areas. Several ecologically diverse peatlands are designed in the county including a number within SACs and NHAs. Wetlands, in particular peatlands, can be important carbon sinks and can contain archaeological features of interest".

The KCC development plan must take into account the above statements when considering any application that could impact on the wetlands, rivers and water courses in the County, both with respect to encouraging tourism into the county and the protection of the county's wildlife and habitats. KCC must ensure that any developments in ecologically sensitive areas fully comply with EU Directives and that this requirement is applied to all aspects of any future development plans.

Protection must be afforded to all rivers, lakes and watercourses both to ensure a clean water supply to business and homes but also to ensure that rivers and lakes comply to EU standards. This will provide protection to aquatic life, waterfowl and other species which live in such habitats, which provide substance to a diverse number of species. The knock on effect of this is that it will also encourage tourists such as bird watchers, anglers and walkers to the county.

We, the undersigned, demand that KCC immediately withdraw the Landscape Character Assessment and any current and proposed zoning for wind farms, solar farms and BESS in the entire county.

Linda Edwards (Secretary, Lixnaw Wind Aware Group)
Fred O'Sullivan for Sliabh Luachra Wind Awareness Group
Daniel Brown for (Tullamore Action Group)
Tony Carroll (Secretary, North Kerry Wind Turbine Awareness Group)