

County Development Plan 2022 - 2028
Submission

23 FEB 2022

PLANNING AUTHORITY
REC'D. AT PUBLIC COUNCIL

Name:

Shane Brosnan

Redacted - Personal Information

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 zoning of the Scartaglin Region for open consideration to the development of wind farms. (Blue Region in Development Map).**
- 2. The zoning of existing wind farms within the Scartaglin region for repowering. (Red Region in Development Map).**

• The **visual impact** 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.

• The **noise** 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.

• The **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.

• **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).

· The destruction of Flora and Fauna 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.

· 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. The Brown Flesk River (A tributary to the Flesk River) runs through the Knockeenahone region. The Flesk River is a Special Area of Conservation for the Freshwater Pearl Mussel. 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. Knockeenahone, Barna and Knockrour regions are all directly located within a 1km radius of Brown Flesk River and within 5km of the Blackwater River and should be excluded from inclusion in any open consideration for wind farm development zone.

· 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.

· 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.

· 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. These regions should be excluded for prospective zoning for open consideration to wind farm development within the Kerry County Development Plan 2022 - 2028.

Signature:

Shane Brosnan

Date:

21-2-2022