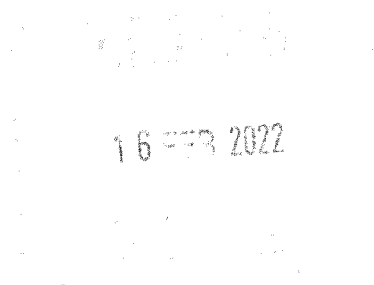


Kerry County Development Plan 2022 – 2028 Submission

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**. These properties have been 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 so close to the dwellings of people.
 - ❖ 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, turbines are not suitable for the areas which have been included in Area 18 of the Maps Appendix, which have been marked as areas for 'Further Assessment' or areas 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 **marshy and boggy land in the locality**. This damage is as a result of everyday use by local lorries and farm machinery that wouldn't even compare to the scale of destruction, which would be caused from the heavy machinery used in the construction of wind 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 town lands of Kilsarkan East, Glanlea, Knockacorrin and Anablaha where **peatland is located on steep sloping hills, which are 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. Bog land 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 the specific area for wind zoning potential within Area 18 of Map 6.45. The Blackwater River is adjacent to all the regions

highlighted for potential 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, Knockacorin, Ballintourig, 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 a 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).
- ❖ 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 within Kerry and take action before it is too late.
- ❖ The County Development Plan must also 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. The regions outlined for potential wind farm zoning in Scartaglin are not suitable for wind farm development and should be removed from 'Open to Consideration' within the Kerry County Development Plan.**

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Signature: Michael Casey Date: 13/2/2022