



Planning Department
 Kerry County Council
 County Buildings
 Rathass
 Tralee
 Co. Kerry
 V92 H7VT

Our Ref: 161101

22nd February 2022

Re: Submission to the Draft Kerry County Development Plan 2022-2028

Dear Sir/Madam,

On behalf of our client, Stacks Mountain Windfarm Ltd., (an associated company of Enerco Energy Limited), Lissarda Business Park, Lissarda, Co. Cork, MKO wish to make this submission on the Draft Kerry County Development Plan 2022-2028 (DCDP). Enerco Energy limited is an Irish-owned, Cork based company with extensive experience in the design construction and operation of wind energy developments throughout Ireland with projects currently operating or in construction in Counties Cork Kerry Limerick Clare Galway Mayo and Donegal.

As a leading renewable energy developer our client is particularly interested in the relevant provisions of the DCDP that will manage future renewable energy infrastructure within Co. Kerry, and furthermore contribute to overall national targets on renewable energy. In this regard this submission has been prepared with regard to a seven-turbine wind farm which was has been recently (23rd December 2021) granted Planning Permission by An Bord Pleanála under ABP-301852-18, (Kerry County Council Pl. Ref. 14/13). Under this consent a seven-turbine wind farm and all associated works (“the Ballyhorgan Wind Farm”) has now been granted permission The townlands this project is located in are set out in Table 1 below:

Table 1: Townlands within which the proposed development is located

Development Works	Townland
Wind turbines and access roads, Substation, Control Building, Construction Compound & Borrow pit	Ballyhorgan East, Ballyhorgan West, Ballyhorgan South, Iramore, Knockburrane, Lissahane, and Muckenagh.
Underground Grid Connection Cabling	Lissahane, Ballygarret, Knockburrane, Banemore, Lyracrumpane, Carrigannon, Reanagowan, and Muingnaminnane

Figure 1 attached shows the site location of the Ballyhorgan Wind Farm and all associated works.

Under the current Kerry County Development Plan and its associated Wind Energy Strategy the site of the permitted wind turbines in the Ballyhorgan wind farm project are currently designated as ‘Open to Consideration’. We note that under the provisions of the Draft Plan this designation is proposed to be



removed and that the lands currently are neither proposed to be designated as ‘Open to Consideration’ nor as ‘Repower Area’, which are the two designations that are proposed to be provided in relation to wind energy development areas within the County in the updated Draft Wind Energy Strategy.

It is acknowledged the Draft Kerry County Development was published in advance (6th December 2021) of the recent decision of the Board (23rd December 2021) in relation to the Ballyhorgan Wind Farm (ABP-301852-18, Kerry County Council ref 14/13). It should be noted that in granting permission for the Ballyhorgan wind farm, the Board carried out and completed comprehensive Environmental Impact Assessment (EIA) as well as Appropriate Assessment (AA). This site-specific analysis that has been carried out by the Board concluded that the site is an appropriate location for a wind farm development across all the relevant considerations, including landscape, ecology, human health, heritage, soils and geology, hydrogeology. On the basis of the comprehensive and site specific analysis that has been completed by An Bord Pleanála the site of the Ballyhorgan Wind Farm should be designated as “Open to Consideration” for wind energy development, as it has been proven to be an appropriate and suitable location for the provision of wind turbines using the same criteria considered by the Planning Authority within its strategic assessment (methodology of which is set out in Appendix 6 of the Draft Plan). Notwithstanding this, however, as this is now a consented wind farm site, at a minimum the extent of the site must be acknowledged as being “suitable for re-powering” under the current plan similar to the sites of other consented and operational wind farms. This would require the following:

- › An alteration to Map 6.1 of the of Appendix 6 of the Draft plan’s Wind Zoning Methodology (which notes the location of all consented wind farms),
- › An alteration of the table in section 12.5.3.1 of the draft plan by increasing the number of permitted wind turbines to 381 (increase of 7 from the currently stated 374);
- › An alteration to map 12.2 of the Draft Plan to shown the permitted Ballyhorgan wind farm development as one of the “Existing & Permitted Wind Energy Developments” within the County; and
- › An alteration to Map 12.4 of the Draft Plan to include the extent of the permitted Ballyhorgan wind farm as a “Repowering Area”.

In relation to this request and consistent with the wind zoning methodology followed by the Planning Authority as set out within Appendix 6 of the Draft County Development Plan, the following must be noted in relation to the site of the consented Ballyhorgan wind farm:

- › The site is not located within a Natura 2000 site, and An Bord Pleanála have concluded that the permitted development will not by itself or in combination with other plans and projects adversely affect the integrity of any European sites in view of the sites’ Conservation Objectives.
- › The permitted development does not adversely affect any Natural Heritage Areas;
- › The permitted development does not give rise to significant adverse effects on any practical resource constraints identified by the Planning Authority (i.e. settlements, lakes, elevated areas),
- › The permitted development does not give rise to significant adverse effects on any accessible resource constraints identified by the Planning Authority (i.e. Kerry airport, areas of prime special amenity, archaeological landscapes, Unesco world heritage site, hen harrier areas, nature reserves, Killarney national park, sensitive catchments);



- The permitted development does not adversely affect Soils and Geology, and is neither located in an area identified within the plan as having landslide susceptibility nor being of geological heritage;

In granting consent for the Ballyhorgan wind farm the Board concluded as follows:

“..the proposed development would be in accordance with European energy policy, the National Planning Framework and Kerry County Development plan 2015 to 2021. The proposed development would:

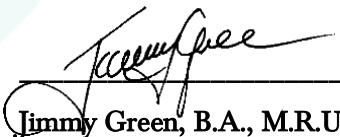
- *make a positive contribution to Ireland national strategic policy on renewable energy and its move to a low energy carbon future,*
- *have an acceptable impact on the landscape, both individually and in terms of the cumulative impact with other existing and permitted windfarms in the wider area,*
- *would not seriously injure the residential or visual amenities of the area,*
- *would not adversely affect the archaeological or natural heritage, and*
- *be acceptable in terms of pedestrian and traffic safety*

the proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.”

The overarching purpose of this submission is to assist Kerry in harnessing its full renewable energy potential through improved application of planning policy and development management in order to best utilise the County’s wind energy resources. **It is respectfully requested that the forthcoming Draft plan includes the site of the Ballyhorgan wind farm (as shown in Figure 1) as a ‘Repowering area’** in order to strike a balance between protecting County Kerry’s natural amenity and resources while ensuring the most appropriate renewable energy sites can be brought forward in order to contribute to our national goals and objectives. Designating these lands as a “Repowering Area”, will acknowledge and support the findings of An Bord Pleanála’s EIA and AA that have been completed in relation to this site and also fully adheres to the Planning Authority’s own methodology in assessing the suitability of sites for wind energy development under the methodology set out in Appendix 6 of the Draft Plan.

Yours sincerely,

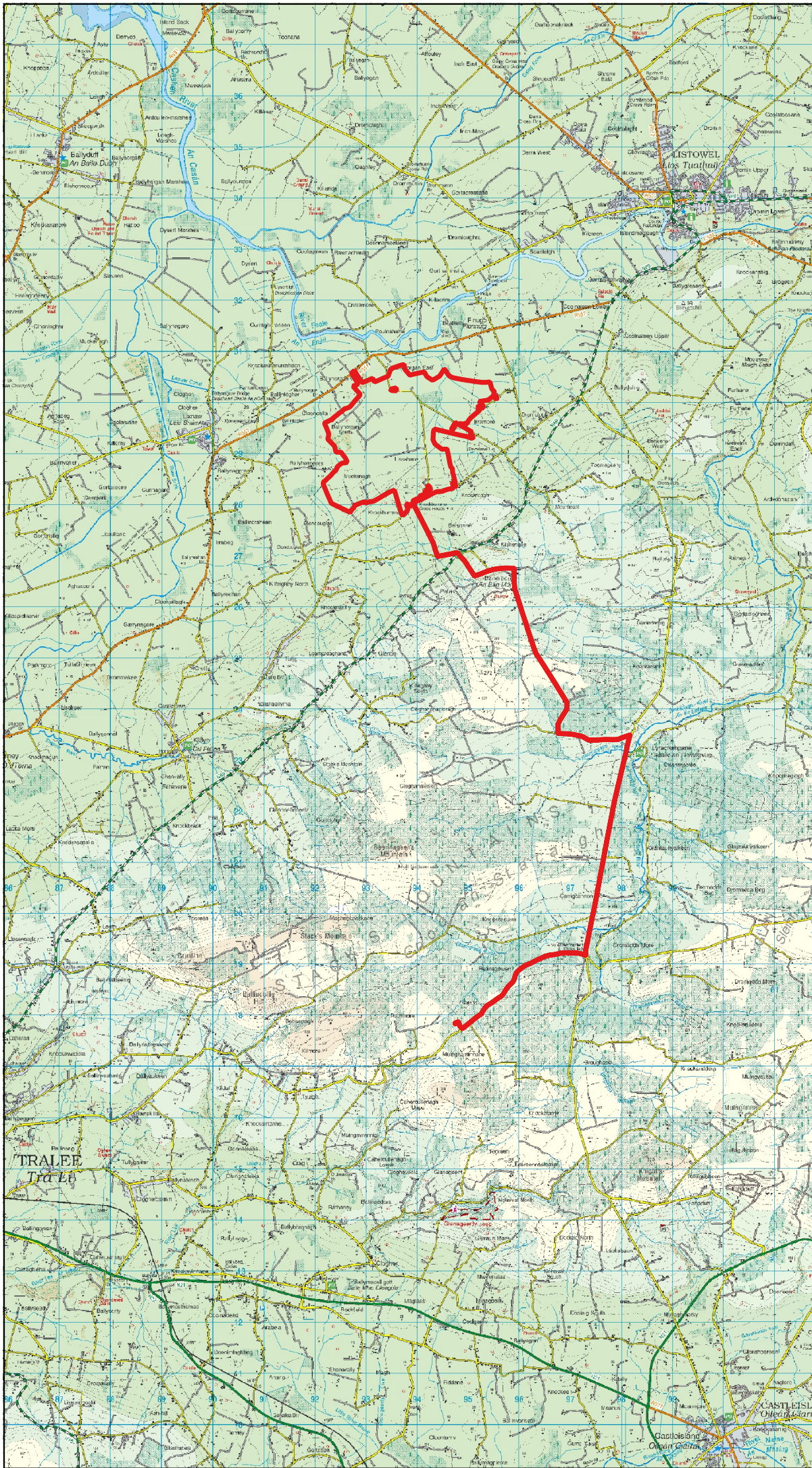
Yours sincerely,



Jimmy Green, B.A., M.R.U.P., M.I.P.I.
Principal Planner,
MKO

Encl. Figure 1.





Map Legend

 Site Location

Figure 1



Drawing Title

Site Location

Project Title

Ballyhorgan WF

Drawn By

TJB

Checked By

MW

Project No.

121117c

Drawing No.

1.1

Scale

1:100000

Date

29.05.2020



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