

SUBMISSION REGARDING PROPOSED MATERIAL ALTERATIONS TO CHAPTER 11 & APPENDIX K OF THE KILKENNY CITY & COUNTY DRAFT DEVELOPMENT PLAN

This submission is made in accordance with Section 12(7) of the Planning & Development Act 2000 as amended, i.e. a written submission with respect to the proposed material alterations (or strategic environmental assessment) that shall be taken into account by the planning authority before the development plan is made.

1. The Material Alterations that have been proposed to the Draft Wind Energy Development Strategy are welcomed.
2. However the Draft Wind Strategy Areas Map [Figure 11.4] must be reconsidered for the entire County as it should be using the same methodology that was previously used for the 2014-2020 County Development Plan
3. There have not been any significant changes to wind speeds, landscape sensitivities, natural & built heritage or areas of archaeological importance in the last 7 years therefore there is no justification for changing the wind strategy map.
4. The current 2014-2020 County Development Plan categorised the Mountnugent / Johnswell area as “UNSUITABLE” for wind energy development on the following basis:
“This area forms the backdrop for Kilkenny City and is highly visible from the eastern part of the city. There are views from this area of the City, and the converse applies. There are no windfarms permissions in this area.”

However this area is now deemed to be “Acceptable in Principle” without any justification.

This area must be returned to “Not Normally Permissible” based on the same methodologies that were employed in the previous development plan.

5. The potential for having large-scale wind farms as a backdrop to Kilkenny city is alarming not just for residents of the area but for the entire image and marketing of the “medieval city”.
6. The Landscape Character Analysis referred to in the sieve mapping process identified the Johnswell/Castlewarren as an “Area of High Amenity” and the Castlecomer Plateau as one of the “high amenity areas”. This area therefore needs to be included in the sieve mapping.
7. The mapping process fails to measure the current and future carbon sink potential of the proposed windfarm sites, including tree lines, hedgerows, and wetlands. Carbon sink potential should be projected prior to any development of wind farm sites.
8. The sieve mapping process for the wind strategy map considered only Freestone Hill as a standalone element, and **not its environs** which would include its wider setting and backdrop of the Castlewarren / Johnswell hills.
9. The wind strategy fails to consider the impact of windfarms on the economic viability and social fabric of rural areas. Thriving rural economies have the potential to be decimated by depopulation and devaluation by the location of windfarms.
10. The proposed Draft Wind Strategy Map if adopted without change would result in the almost wholesale opening up of the county to speculative wind farm developers. There is no strategic basis to do this. Electricity generation is carried out on a national basis, and some areas within the State are much more suited to wind farm development than others, with less landscape sensitivities and less dense rural populations. It must be

borne in mind that offshore wind farms will play a significant part in meeting national renewable energy targets also

11. The proposed material alterations correctly identify that an increase in solar PV farms will also play a significant role in renewable energy provision within the County. Kilkenny as a whole is much more suitable for solar PV farms than wind farms, and these can easily allow the county to contribute to national renewable energy targets.
12. Eirgrid have concluded that a generation-led approach which focuses much more on **offshore wind energy** generation is the only approach likely to meet the required national renewable energy target by 2030, while a developer-led approach focussing on inland wind farms will cost much more and fail to hit the 2030 target.
13. With respect to the proposed material alteration to the Strategic Aim of Chapter 11 Renewable Energy, the following addition in green text is suggested:
Strategic Aim: To promote and facilitate all forms of renewable energies and energy efficiency improvements in a sustainable manner as a response to climate change in suitable locations having due regard for and without significant detriment to existing natural heritage, built heritage, biodiversity and existing residential amenities.
14. With respect to Section 11.5.2(d), the following deletion is suggested:
Large-scale wind energy developments will, ~~in usual circumstances~~, only be considered in 'Acceptable in principle' areas.

CONCLUSION

In summary the material alterations to the wind energy strategy are welcome but these alterations require the areas identified as unsuitable for wind farm development in the 2014-2020 Plan to be carried through into the new 2021-2027 Plan.

The Johnswell/Castlewarren areas in particular form a significant scenic backdrop to Kilkenny City as well as providing highly scenic views over the Kilkenny, it also contains significant archaeology and built heritage, the settings of which could be devastated by a significant wind farm development in the area. It is difficult to see how such a development in this area would not also damage the tourism and branding of Kilkenny as a “medieval city”.

SIGNED

NAME;

ADDRESS ;
