11th March, 2021.

Draft City and County Development Plan,

Planning Department,

Kilkenny County Council,

County Hall,

John Street,

Kilkenny,

Co. Kilkenny,

R95 A39T.

EMAIL: [ourplan@kilkennycoco.ie](mailto:ourplan@kilkennycoco.ie)

***Re: Draft County Development Plan.***

Dear Sirs / Madam,

It is our view that Kilkenny County Council should not produce a Wind Energy Development Strategy. Appendix K to the Draft Development Plan is based on outdated 2006 Government Guidelines on Wind Energy.

The Government has Draft Wind Energy Guidelines which are due to be finalised shortly.

The Development Plan is very outdated and in particular with regards the “wind energy guidelines”. In particular wind turbines which are now taller than before. There are major health implications connected with these turbines e.g. epilepsy – Photosensitive epilepsy

affects up to 3% of people with epilepsy and is triggered by flashing lights or certain patterns. ... Under certain conditions a wind turbine's rotating blades cast a shadow from the sun, having the effect of 'shadow flicker'.

The recent report that Irelands National Biodiversity plan has failed means that Ireland will need to work harder to protect, promote and encourage our existing biodiversity and natural habitats. The designation of the Castlebanny area for large scale industrialisation would mean clearing and destruction of naturally biodiversity rich vegetation and the displacement of protected mammals, birds, bats, insects and butterflies ultimately not halting loss of biodiversity in Kilkenny or in Ireland. The Natura 2000 Network of the River Arrigle (SAC) and River Nore (SPA) and its Annex I and II species need to be protected in County Kilkenny.

There is no public water supply in rural Kilkenny. Each home have their own private well for potable water. Should a very real risk of pollution to the aquifer or land slippage occur through the immense scale of construction required for a large scale wind farm development or “Castlebanny Wind Farm”, how do the people of South Kilkenny acquire clean drinking water? Who is responsible

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The Castlebanny area is designated as ‘Open for Consideration’ to Wind Energy in the County Kilkenny Development Plan. This carries a category allowance of ‘Small Scale Wind Development’ that can comprise of no more than 5 turbines at a height of less than 65m and max. Output of 5MW.

Recently a corporate company with commercial interests have managed to evade the area designation set by the development plan and bypass Kilkenny County Council for planning permission. The proposal called ‘Castlebanny Wind Farm’ (Reference No. ABP-309306) was submitted directly to An Bord Pleanala seeking to construct 21 turbines at a height of 185 metres each, a 100 metre mast, an onsite substation, several ancillary buildings and three onsite borrow pits for rock. There are numerous concerning details surrounding the proposal called ‘Castlebanny Wind Farm’ including a lack of public consultation, a plan to place the 185 metre high offshore scale wind turbines within 750 metres of dwelling houses, a plan to drill the River Arrigle Special Area of Conservation for cabling and a plan to blast three onsite borrow pits for rock.

We do not want any of the land the subject of the proposed wind farm at Castlebanny, Co. Kilkenny to be re-designated in principle.

It would be very premature of Kilkenny County Council to produce any document prior to receipt of the Governments National Strategy.

Yours faithfully

***Ollie & Carmel Harrington***

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Ollie & Carmel Harrington