Kilkenny County Council Planning Department,

County Hall,

John Street,

Kilkenny.

R95 A39T.

RE: Submission towards Draft Kilkenny City and County Development Plan 2021-2027

To whom it concerns,

Thank you for this opportunity to comment on the Draft Kilkenny City and County Development Plan 2021-2027.

We are a group of concerned citizens living in Templeorum and its environs.

In Section 11.5.2 Wind Energy Development Strategy of the county Dev. Plan, Kilkenny Co. Co. has divided the county into three policy areas for the development of wind farms, based on an assessment of viability against other considerations, namely "Acceptable in principle", "Open for Consideration" and "Not normally permissible" with the associated map found in Figure 11.4.

Our group is extremely concerned with Kilkenny County Councils proposal to change our local area in the South of the County from its current zoning of being "Unsuitable" to "Acceptable in principle".

Speaking to residents in the village of Templeorum and it surrounds we found that the high majority of respondents were strongly opposed to the development and would support resisting any potential Wind Turbine planning applications vigorously.

We appreciate that transitioning to a clean energy future is essential for the protection of human health, the environment and climate *but* this type of development has to be careful, considered, balanced and forward-thinking.

Section 11.4 (and Objective 11C) of Volume 1 the Draft Plan states that "In line with the Climate Action Plan, this Renewable Energy Strategy aims to enable Kilkenny to generate a minimum of 100% of its electricity needs from renewable sources by 2030". We understand the need, and fully support, to reduce our reliance on fossil fuel energy sources, but for starters, doing so within a short time scale might decrease the associated time



and full deliberation needed to consider the overall effects on the areas and communities affected.

The National Renewable Energy Action Plans (NREAPs) adopted under Directive 2009/28/EC to fulfil the 20% by 2020 renewable energy programme was found to have bypassed the legal requirements for public participation.

Minister Eoghan Murphy acknowledges in his own foreword of the Draft Revised Wind Energy Development Guidelines December 2019 that 'From a good practice perspective, it is desirable that local communities are properly engaged in the planning process relating to wind energy proposals'.

In the same document, Minister for Communications, Climate Action and the Environment, Richard Bruton, states 'These guidelines set out how we deliver on our objectives, in accordance with best practice and in partnership with people living in the local area'.

Our community has not been properly engaged. Our community has not been consulted in partnership with Kilkenny Co. Co. The people living in our local area have had no opportunity to conduct information meeting due to the current Covid-19 worldwide pandemic. It is untimely, to say the least, that this proposed change is continuing. Many have been denied the opportunity to have their voice.

The following areas are of particular concern to our group:

- 1. Carbon Footprint: There is a huge carbon footprint to be considered in manufacturing & installation of any turbines. We question the logistics of such a large-scale development given the existing infrastructure with narrow roads in all areas. Very heavy truck traffic during construction post serious dangers for road users and children. These roads were never designed for industrialisation.
- 2. Tourism: Our parish is part of the South Leinster way, this is designated as a National waymark trail by the national trail's office of the Irish Sports Council, advertised on sportsireland.ie, trails.ie and many more. Popular for hikers all year round it has pristine landscape and views. The South Leinster way finishes its journey in Carrick-on-Suir, which is the start of the Blue way to Clonmel. The additional potential tourism that will occur also when the Waterford greenway is extended to New Ross will be overshadowed by a landscape marred and destroyed by wind turbines.

The looped walk in Mountain grove is part of the Kilkenny tourism trail and attracts visitors all year round from near and far. This looped walk in the heart of our parish is also the home to a rare purple orchid. These local tourism areas would be negatively impacted with the siting of turbines.



There is an abundance of Standing Stones and Dolmens throughout the area but Harristown is also home to one of the oldest dolmens in Europe "Leac Na Scail" which dates from 4000-3000 BC.

Wildlife: This beautiful area is host to a diverse range of wildlife including pine martens, hen harriers, owls, buzzards, kestrels, cuckoo, sparrowhawks and red deer which are often encountered in Corbally and Garryduff woods, which current proposals are to categorise as "Acceptable in principle". Even wind turbines construction phase would be detrimental to this wildlife and turbines would likely result in loss, damage and impact negatively on the nationally decreasing local population of species that include red squirrel, common pipistrelle bats and hen harriers.

3. Water and hydrological effects: We question if an assessment has been done on the viability of these turbines in direct relation to the water table that serves as a reservoir and provides water to the surrounding area. According to the EPA, the EU developed the Water Framework Directive (WFD) establishes a framework for the protection of all waters including rivers, lakes, estuaries, coastal waters and groundwater, and their dependent wildlife/habitats.

Section 3.3.2 of the Environmental Reports Kilkenny City and County Draft Development Plan 2021-2027 confirms that "plan elements that could potentially affect the integrity of European Sites include:

 Loading pressures from the operational phase of developments – these sources could result in habitat loss, disturbance effects, interactions with water quality and habitat fragmentation

This document refers to the term "water" 774 times and therefore we would have serious concerns on the possible effects on our water quality.

4. **Health Impacts**: Potential health effects of wind turbines are well documented and effects include (but are not limited to) ringing in ears, headaches, lack of concentration, vertigo, and sleep disruption.

For example, the issue of wind turbine noise has raised concern in communities around the globe. The effect of constant low frequency sound from the turbines for those that live in close proximity is of particular concern. Children with autism, learning needs and sensory issues are also adversely affected.

A real-world example of the effect of shadow flicker can be seen via the following link: shorturl.at/qruQZ

5. **Property Devaluation**: According to WindAwareIreland, wind turbines negatively affect the value of property by varying amounts depending on the proximity of the individual house to the wind farm. Five different studies concur that this drop is between 11% and 40% for homes located within 2 km of a wind farm.



SEAI (2020) have articulated that Ireland has one of the best offshore renewable energy resources in the world and has the capacity to accommodate high levels of offshore generation. This provides a significant opportunity to decarbonise our electricity system and to advance the decarbonisation of the energy used in transport and heating without the detrimental effect on local communities.

If this proposed change was to take place, could planning applicants demonstrate that their plan wouldn't impact habitats, species or features of natural heritage?

Wind Turbines are widely publicised as having the potential unacceptable adverse impact on public safety, human health, residential amenity, biodiversity and nature conservation. Our area is renowned for its unspoiled landscape, the hills are rich in natural heritage with local monuments and wildlife abound.

We are dismayed that Kilkenny County Council are even considering proposed changes in such a beautiful and historic area, in particular during this pandemic where consultation is at a minimum. We believe that this area must be protected, at all costs, from such industrialisation with its history and beauty preserved for future generations.

Any adverse societal and environmental impacts from industrial wind turbines should be fully considered. Our area is currently zoned **unsuitable** for turbines and we strongly ask that it remains as such.

Yours sincerely,
Templeorum Environmental Group
Templeorum
Piltown
Co Kilkenny
templeorum2021@gmail.com



	Address
Somes Pfelon	Ballygown Poltow Co Kulkeny Ballygown Pellow, Co, Kelleny Tosomerone Pilkoun Co. Kilkeny
Camel Phela	Ballyown Pellow, Co, Kelleny
Mary Dreman	Tosonarone Pilkoun Co. Killien
Millie Woloh	Tobernson Pilton Co hilling
	TOBERNARRIK Polter Co Kon
Hayaet Mana	u Kvocktopha.
Toolf Panara Caltere full	· · · · · · · · · · · · · · · · · · ·
Marta feal	
John Revill	
Hicheal full	
Emma Paulo	fiddowi
James Pale	Fiddown.
Can Paule	Fiddows
DarraghPada	fiddows.



Name	Address
Melissa Nonris	Raheen Piltown Co. Kilkenny
Frank July	53 Duntine ON & Stairs
D. 1/01/5	Ywkstee Piltown
Declar Norris	Ralican Pikour
Meryn Briscoe	Templeonum PILTOUN
Troune Hickey	pilbrana Co Kilheny
Martin Telford	Jonesby Cettinge; Piltown Co Filh
Conton Hickey	pilbown, Killening
David Hickey.	
Clara Norris	piltoron, kilkung. rancen, piltown co. kilkenny
Valence o Duyer	Paheen, Pillown, Co. Kulkerny
Man (Pujer	Raheen Pellown Co-William.
also ay	Roheen, P. Itom, Co. Kulkerry
Loma Obyer	Kaneen, Piltonn, Co. Killery
an O Puyer.	Raheen Piltown G. Kilkerry
Gan O Dage	Rah son Pittoun Cokk
Jahn Dizcoll	JAMESTOWN, PILTOWN,



Name	
James Futzge	Rald Templeorum
Patricia Fu	tzjerdd "
Nicola Tiggeralc	l Henpleorun.
	1 Rohen Templeorum
AcibhiN Brennon	Reheen templearm
Eanna Brennan	Reheer Fempleonn.
Dans Bitle	2 Kenpleorin
Geresa Dunphy	Raheen, Templeseum Pittown
Seamus Duy	Allan TEMPLEORIM Co-Kilken
Earn Dungh	Kallen Templosan
PHILLIP PEGA	OLDO TEMPLEORUN
Judy Marlow	Temploorum
Darren heapy	corbally woods TEMPLEORUM
Mandy heapy	coalally woods Templeon
Charlie heapy	corbelly woods Templeoner
Teddy heapy	corbrdy worls Temploony
Ham Joedan	Gotikush Pildoun
Mannah Jordan	Gontfush Palbourn



Name	Address
Paul Quisley JOHN OSITEA	Raheen Templean KK
JOHN O SHEA	RAHEEN, TEMPLEORUM
TON: OSHEA	RAHEEN, TEMPLEORUM
KAYLA OSHEA	
RYAN OSHEA	RAHEEN, TEMPLEORUM.
Acson Holden	Lickewa Pillown Co kilkenry
Kamela Holder	Lickaun Kiltown Co Kilkenny.
Mane Dodg	Brew Phon
ray Walk	Ballygow, Pillow
PJ Gody	Brenes RIVous
Frank Udsh	Dalypour Pilbur
Forme Walsh	Bally Dur Mullenavat O. Kelk
Dong Walsh	Bally ouin Mullinavat (D. kolk
Mall Wash	Bally Quen Mullimon of CO. Kalk.
Barry Well	Earls-str, Mullinget, Co-Ulla
Joney Endan	
	Goobbush Pillower
Charlette Tordan	Gopfmal Pilfoury

