



Uimhir Thagarta Uathúil: KCC-C55-280

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Stádas: Submitted

Aighneacht:

WildKildare Submission on CDP (Biodiversity, Peatlands Park and Wind Energy Mapping)

Comhairliúchán:

Draft Kildare County Development Plan 2023 - 2029

Dáta a cuireadh isteach: 23.05.2022 - 16:23

WildKildares Observations and Comments on proposed Windfarm Zoning in Appendix 2

Caibidil: Appendices

Concerns relating to Appendix 2 (Wind Farm Sensity Mapping)

Sec.1.2 Makes some claims on renewable energy that are at variance with the facts when it comes to wind energy.

2.1.2 Refers to the "European Green Deal" but no mention of its Biodiversity targets or aims

2.2.4.1: Mentions the 2006 wind energy planning guidelines which even the government has deemed outdated. A plan that bases landscape zonings on this criteria is clearly flawed in advance of the long delayed new guidelines this government has promised

Table 1, Step 3 :Sensitity Analysis: Has the key statement "**consideration of any wind energy development in or near these areas(natural heritage) must be subject to Irelands obligations under international, EU and national legislation.** There is a lot to unpick here given the number of violations committed by the state since 2000 with regard to wind energy developments. Examples include the Derrybrein and Keeper Hill cases where the European Court of Justice found against Ireland. It is highly unsatisfactory that the sensitivity map presented in Appendix 2 appears to be deficient on many of these fronts regarding this states obligations under the EU Birds, Habitats etc. Directives.

2.4.3 Landscape Character Assesment : Appears to conflict with attached Map since the Western Boglands are classed as "High Sensitivity" yet this is not reflected on Map coding in many areas

2.5.2 5th paragraph make questionable assumptions based on "data" provided by industry lobbyists WEI

2.6 Concerns history of wind planning in the county. Makes a mention of the reasons the Umeras wind farm was turned down (DOD critical low level route in support of Air Corps) yet proposed wind farm sensitivity map takes no account of this decision nor the matters raised!!

3.0 Claims that SEA and AA processes have “informed” design of the map but this is questionable as existing data on birds and habitats etc. appears to have been ignored!!

3.2.1 WildKildare would argue that the conclusions in paragraph 3 here are outdated and deficient in terms of the need for buffer areas etc. around sensitive habitats, locations etc.

3.3.1 Problematic as it fails to include the necessary buffer areas required to protect the “qualities” of designated sites etc.

3.3.5 The conclusions here in terms of the map are not reflective of the realities in terms of what is needed to comply with the stated aims in terms of Natural Heritage etc.

3.4.2 Refers to “Aviation Constraints” yet map is not reflective of Umeras decision or the general concerns of the Air Corps

3.4.3 IMO a “Developer led” conclusion here.

4.1 “Acceptable in Principle” zone description lacks necessary reference to data on Annex 1 bird migration routes, presence etc. “Open for Consideration” again lacks the necessary safeguards referred to above or buffer zones around EU designated sites and other “sensitive” areas

4.2 Buffer zones around the likes of Canal/Barrow Blueways are clearly wholly inadequate on sensitivity MAP

4.3 Highly problematic as this proposed Zoning does not take account of the footprint of our Peatlands Park as supported and referenced in the CDP

6.22 Bats and Birds: Problematic as the factors here do not appear to have been taken into account with respect to the coding on the wind farm sensitivity map eg, no provision of buffers around sensitive/designated sites or important Annex 1 bird species flight corridors etc.

6.24 (Biodiversity Maps) Similar issues to **6.22** above in relation to flaws in wind farm sensitivity map as presented.

6.26 : Paragraph on “modified and degraded” peatland habitat fails to take into account the biodiversity richness of these sites and their potential and actual hosting of red listed bird species like Curlew and Snipe that are proven to be significantly negatively impacted by operational wind turbines. Obviously this is of particular relevance to the Peatland Park proposal that is recognised and supported elsewhere in the CDP

6.30 : Cumulative Impacts of Wind Farms: This needs firming up given the proliferation of proposed and granted wind farms in bordering counties (Notably Offaly) that are in and around sensitive peatland sites (both intact and recovering). Again sensitivity zoning on wind farm map do not adequately address this issue, particularly in West Kildare.

6.3 Consultation with Local Community : This is failing badly in most cases eg. Umeras, Drehid, Derryadd etc. and is merely treated as a cynical box ticking exercise by most wind developers. It is also disappointing that KCC or the consultants who produced the Appendix 2 wind farm sensitivity map undertook any community or NGO consultation prior to its publication

6.31 Aviation Requirements : No apparent consultation with Air Corps here??