



Roscommon County Development Plan 2021-2027

Submission on the Draft Roscommon County Development Plan 2021-2027

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Name

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What is the topic of the submission?

Core Strategy and Settlement Policy, People, Places and Housing, Towns and Villages (including zoning), Rural Development and Natural Resources, Economic Development, Infrastructure, Transport and Communications, Climate Action, Energy and Environment, Built Heritage, Natural Heritage, Social, Community and Cultural Development, General Submission

Submission

Or

Attached Submission

Roscommon Development Plan Submission with Killeglan Karst.pdf, 0.33MB

Roscommon Development Plan Submission

Areas in Dysart and Skyvalley and the surrounding areas have been marked as suitable for wind farms based simply on height above sea-level and wind speed; however, these are not the only factors that the EU, the Irish government, and WHO have stated are required to be considered when assessing locations for wind farms. The following are examples of factors identified by those entities that must also be included in the decision:

- Planning permission cannot be granted where the wind farm development would adversely affect the integrity of an SAC or SPA. Irish Government Revised Wind Energy Development Guidelines 2019, page 8. Dysart and Skyvalley and their surrounding areas are home to numerous SACs and SPAs, including the Lough Croan, Four Roads, Lisduff, and River Suck SACs. The areas are also home to numerous water supplies, including Killeglan Springs, and numerous turloughs, eskers, underground rivers, and callows.
- Numerous farms in South Roscommon have lost the use of their land and bogs as a result of those lands and bogs being designated SACs and SPAs. It would be beyond hypocritical of the Roscommon County Council to deny farmers the use of their own land under the guise of protecting the land and all that lives on it only to turn around and permit wind farms which are well proven to deplete and destroy the land they sit on and the surrounding areas.
- Wind farms should be located in close proximity to where the generated power shall be delivered. Irish Government Revised Wind Energy Development Guidelines 2019, page 84.
- Wind farms should not be placed in close proximity to or overlapping other landscape elements such as buildings, roads, power and telegraph poles to avoid visual clutter and confusion. Irish Government Revised Wind Energy Development Guidelines 2019, page 104.
- Careful consideration needs to be given to wind farms in close proximity to farms and houses. Irish Government Revised Wind Energy Development Guidelines 2019, page 107.
- Open and full visibility of two or more farms in one area may be excessive. Irish Government Revised Wind Energy Development Guidelines 2019, page 107. “[S]hould two or more wind energy developments be visible within a confined setting a critically adverse effect might result”. Irish Government Revised Wind Energy Development Guidelines 2019, page 113.
- Proximity to recorded monuments requires assessments and preservation or relocation of the wind farm. Irish Government Revised Wind Energy Development Guidelines 2019, page 133. According to the Irish National Monuments Service, Dysart and Skyvalley and their surrounding areas are home to hundreds of protected monuments. Dysart and Skyvalley and their surrounding areas are also home to numerous “protected structures” listed on the Record of Protected Structures for County Roscommon, for example, Cloonagh House, Dysart; Mountsanfrod Lodge, Dysart; Dysart Church; Dundonnell House, Taughmaconnell; Cloonbigny Castle, Taughmaconnell; Vernacular House, St. Ronan’s Church, Taughmaconnell.

- Roscommon County Council declared a climate and biodiversity emergency in June 2019 and proposals were made regarding tree populations.
<https://meetings.roscommoncoco.ie/ieDecisionDetails.aspx?AIId=2515>
Wind farms undermine this emergency and proposal.
- Roscommon County Council released its Climate Change Adaptation Strategy 2019-2024 in September 2019 highlighting the unfavourable to wind farms projected changes to wind speeds in the area. Climate Change Adaptation Strategy 2019-2024, pages 12, 29-37, 47-48, 52-58.
- Both the Irish government and the EU have implemented more strict assessment requirements, none of which have been carried out. Irish Government Revised Wind Energy Development Guidelines 2019, pages 22, 24-25; Commission Notice – Guidance document on wind energy developments and EU nature legislation, Brussels, 18.11.2020, pages 10, 17-24.
- The Roscommon County Development Plan 2014-2020 places great emphasis on the development of the tourism industry in the county. For example, sections 2.1 and 2.4. Wind farms undermine that plan.
- The World Health Organization (WHO) has acknowledged the detrimental impact of infrasound to human health as confirmed by the Irish government’s Wind Energy Development Guidelines December 2019, pages 12-14. The Roscommon County Council has not engaged in any assessment of the impact of wind farms on human health, including physical and mental wellbeing.
- In 2012 Tourism Ireland ran “The Gathering” campaign, and every year it runs a new campaign to bring the Diaspora home and increase tourism in Ireland. At no time has Tourism Ireland used wind farms to support or bolster those campaigns because nobody is visiting Ireland to see wind farms. People visit Ireland to see the unspoilt natural landscape – the green green fields, rolling hills, and stone walls as far as the eye can see. People visit Ireland to escape, not to run headlong into turbine after turbine littering and destroying the countryside we all love and appreciate.
- The wind farm personnel are preying on the vulnerable and the Roscommon County Council is endorsing that behaviour by permitting wind farms in the county. Employees of the wind farm companies aggressively approach isolated farm owners and demand secrecy and bully those farm owners. The employees of the wind farm companies do not afford time to seek legal counsel and even if they did, many cannot afford such advice; and, as a result the land owners are patronised, insulted and misled into signing documents without understanding the scope and legalities of what they are signing. The Roscommon County Council need to stand up for and protect the constituents who put them where they are and stop giving-in to the long-standing tradition of “brown-envelopes” in this country.
- There is no plan in place for the decommission of the wind farms, which will inevitably occur in 15 to 20 years. There has been no consideration for how the “dead” turbines will be removed, and where the vast amounts of steel and fibreglass will go. It is not a renewable source of energy if in 15 years it will result in huge landfills filled with non-recyclable materials.

- With reference to Figure 7 in Renewable Energy Strategy - “Areas Suitable for Wind Development Draft“. We strongly object to the draft version of this map indiscriminately identifying wide areas of South Roscommon, in particular the Killeglan Karst Landscape (between the settlements of Dysart, Brideswell and Taughmacconnell) , as “Most Favoured” for the following reasons below. The map should be updated to reflect the area as “Not Favoured” in line with the methodology of the rest of the classification.
 - The map includes homes, gardens and farms without permission, and includes grounds of schools, churches, and businesses without permission. Such a broad over-inclusive sweep amounts to the Roscommon County Council exercising eminent domain without having fairly compensated all those impacted.
 - The map was created by desktop geological reference software and is not the result of an actual geological survey that would present the area in all its glory in 4-D and said survey would require the permissions of the relevant land owners. Any such proper geological survey would demonstrate the areas of Dysart, Brideswell, Taughmacconnell and their surrounding areas are not suitable for wind farms.
 - This map does not recognise the council’s own identification of this karst landscape as being of national importance. The map should be updated to reflect the national importance of this landscape.
 - Roscommon County Geological Site Report 2012: Killeglan Karst Landscape: relevant extracts from this report below:
 - This area is unique in lowland Ireland as it expresses what the entire lowland limestone landscape would have looked like before man modified the countryside.
 - The landscape is noteworthy and should be promoted as unique amongst landscape elements among the Roscommon County Development plan and in landscape characterisation.
 - The site should also be designated as an NHA owing to the uniqueness of the natural landscape character.
 - The site importance – this is only such area of lowland, boulder-strewn, limestone, glacial karst in the country. It is of national importance.
 - Additionally, as per Killeglan Water Supply Scheme, Groundwater Source Protection Zones (April 2003), (prepared by Geological Survey of Ireland in collaboration with Roscommon County Council), the limestone in this area is “equivalent to Burren limestone” and a large number of karst features including enclosed depressions (dolines), swallow holes, springs and turloughs.
 - This map does not reflect the County Council’s own identification of the extreme vulnerability to water quality in this karst landscape. The map should be updated to reflect this identified extreme vulnerability.
 - Killeglan Water Supply Scheme, Groundwater Source Protection Zones (April 2003), (prepared by Geological Survey of Ireland in collaboration with Roscommon County Council), Figure 3 Vulnerability Map has area marked as ‘extreme’ vulnerability.

- Per “Water Quality in Irish Karst Aquifers, 2014, Catherine Coxon, Dept of Geology, Trinity College”, Karst regions are particularly vulnerable to pollution due to the occurrence of point recharge, the thin, patchy soil cover found in some karst area, the presence of epikarst and the occurrence of conduit flow within the aquifer. The main drinking water quality concern is presence of microbial pathogens including protozoan parasites resistant to chlorine. Despite the long history of awareness of karst groundwater vulnerability in the Irish hydrogeological community, water quality problems continue to arise, most recently with problems of cryptosporidium in number of karst springs providing drinking water supplies in Roscommon (Roscommon County Council 2013).
- This map does not reflect the karst farming practises active in this unique, rare doline karst landscape of South Roscommon. This type of ‘farming for nature’ involves the application of result-based approaches for the conservation of farmland biodiversity and the provision of ecosystem services. They are undermined by the classification of this area for windfarm development.
- This map contradicts Figure 3, residential setback which shows that the majority of this area should be in the “Not Favoured” category. At a minimum the map should be updated to reflect setback.

With reference to Figure 2 in Renewable Energy Strategy: Landscape Character Values Draft; we object to the area being categorised as Moderate Value. As noted in references above, the councils own geological survey describes this area of national importance. This map should be updated to reflect this area as “exceptional” in line with it’s identified national importance.

Observations on Landscape Assessment Study:

With reference to Figure 3 in Landscape Assessment Study: Landscape value of character areas: LCA 34. the area is incorrectly categorised a single area of Moderate Value. As noted in references above, the councils own geological survey part of this area (Killeglan Karst Landscape) is deemed as of national importance. This map should be updated to reflect the part of the area being “exceptional” in line with it’s identified national importance. Additionally, the Landscape Assessment Study for LCA 34 Page 100 makes no reference to this unique landscape.