



# Roscommon County Development Plan 2021-2027

## Submission on the Draft Roscommon County Development Plan 2021-2027

Submission Date: July 2, 2021 1:33 PM

### Name

Brian Kearney on Behalf of Kilcash and Farbreagues Community Development Group

### What is the topic of the submission?

Towns and Villages (including zoning), Rural Development and Natural Resources, Economic Development, Climate Action, Energy and Environment, Natural Heritage

### Submission

### Or

### Attached Submission

RCC Dev Plan Submission Kilcash GroupRev1.pdf, 0.39MB

Residents of Farbreagues, Kilcash and surrounding communities of protected scenic view 19 and LCA33.

Roscommon County Council, Áras an Chontae

Roscommon

County Roscommon

F42 VR98

Dear Sir/ Madam,

We residents of Kilcash, Farbreagues and surrounding townlands welcome the opportunity to make a submission on the Draft RCC development plan and request this submission is taken into consideration in the finalisation of the plan.

Outlined below are observations/recommendations co-ordinated by residents of the communities surrounding **Scenic View19** in Kilcash. We would also request that the council make us aware of any further consultation periods regarding the making of the new development plan.

This proposal is for rezoning the Scenic View 19 area of Kilcash in LCA33 as a **non-favourable** location for wind farm development. Reason for such are listed in the below observations.

## **1. Ecology: Impact on biodiversity and in particular Natura 2000 sites buffer zone.**

- The development plan must achieve a reasonable balance between responding to overall Government Policy on renewable energy and enabling the wind energy resources of the Local Authority's area to be harnessed in a manner that is consistent with proper planning and sustainable development. The assessment of individual wind energy development proposals needs to be conducted within the context of a "plan led" approach which involves identifying areas considered suitable or unsuitable for wind energy development." Wind energy developments can have a variety of impacts on ecological receptors depending on design and location. Developments within Natura 2000 sites pose the highest risk of impacts. It is important to ensure that development pressure does not inadvertently threaten internationally important bird species protected within or outside the Special Protection Areas in County Roscommon as outlined by the NPWS in other county's development plans.
- The View 19 site is centrally located in an area almost entirely surrounded by sites protected under European law. These include: Lough Ree SAC & SPA, Four Roads SAC & SPA Ballinturly turlough and Loughnaneane turlough. The site is located on the flightpaths and foraging grounds of a number of protected species outlined below. As per previous application refusal by An Bord Pleanála in 2016 for wind turbines at Rathconnor, Four Mile House, these species must be protected (case number PL20 .243479). (Planning Reference 13-78)
- The wildlife, biodiversity, and threat of Irish Birds in decline needs to be carefully managed. The hen harrier, Whooper swans, Meadow pipit, Golden Plover all Red-listed species, occurs widely on site of view 19, along with various Amber listed species including kestrel, sparrowhawk, snipe, skylark, stonechat and linnet. Also, woodcock (Red-listed) has been recorded in the View19 location. Additionally, the Blackheaded Gull, Swallows, Buzzards, along with mammals such as Bats, Red Squirrels, Badgers, Irish Hares, Otters, Mink, Pine Martins, Foxes and Rabbits have all be seen on this location. The Kilcash area is home to an array of insects and spectacular butterflies, frogs and lizards. Filling this location with large cement foundations for wind turbines will be detrimental to these creatures. Kilcash is home to beautiful flora and a wide variety of wildflowers which the bees pollinate– it is a special place of biodiversity and needs to be conserved.
- The protection and management of Natura 2000 sites is governed by Article 6 of the Habitats Directive, which allows for two types of measures. The first type (Article 6(1) and 6(2)) centres on the conservation and management of all Natura 2000 sites at all times. The second type (Article 6(3) and 6(4)) lays down an assessment and permitting procedure for plans or projects likely to have significant negative effects on Natura 2000 sites. Article 6(1) and 6(2) of the Habitats Directive requires developers to take positive conservation measures that correspond to the ecological requirements of habitat types and species present on the sites (Article 6(1)); and to take measures to avoid any deterioration of the habitat types or any significant disturbance of the species for which the sites have been designated (Article 6(2)).

The Scenic View 19 area is a significant breeding and wintering habitat for an extensive range of birds and bats, including:

The following bird species are recorded and are regularly sighted in the area of the proposed development: Buzzard (Section 22), Sparrowhawk (Amber BoCCI, Section 22), Kestrel (Amber BoCCI, Section 22), Cormorant (Amber BoCCI), Whooper Swans (Annex 1, Amber BoCCI), Snipe (Amber BoCCI), Golden Plover (Annex 1, Red BoCCI), Black headed gull (Red BoCCI), Meadow Pipit (red listed BoCCI), Stonechat and Wheatear (both amber BoCCI species). Barn Owl (Red BoCCI) and Long Eared Owl (Amber BoCCI) are recorded in Mote Park approximately 3km from the site of the development and are likely to use the land around the development site for hunting.

- All of these species vary their flight height depending on wind conditions, thereby to limit a species to a particular height in my opinion is not a fair assessment. Due to this, turbines should not be positioned anywhere near flight paths of birds listed in Annex 1 of the Birds Habitat Directive. I have seen the swans flying overhead across the proposed location and it is a sight to behold and one that should be cherished for many generations. According to a study by Birdlife International (2013) on behalf of the Bern Convention, the main impacts of wind turbines on birds is displacement, Collision mortality, habitat loss and fragmentation and range reduction. The Habitats Directive 92/43/EEC forms the cornerstone of Europe’s nature conservation policy and affords protection to all wildlife, plants and their habitats. It is with reference to this directive that the impact of any large-scale developments on wildlife and habitats must be considered.
- Bats are also found in multitude near view 19 and would be significantly impacted by this development, again a protected species. All bats are listed on Annex IV of the EU Habitats Directive. The domestic legislation that implements this Directive gives strict protection to individual bats and their breeding and resting places.
- The Irish hare has been legally protected since 1930 in the Republic of Ireland, initially under the Game Preservation Act (1930), more recently by the Wildlife Act (1976) and Wildlife (Amendment) Act (2000). It is listed on Appendix III of the Berne Convention (Anon, 1979), Annex V(a) of the EC Habitats Directive (92/43/EEC) and is listed as an internationally important species in the Irish Red Data Book (Whilde, 1993). The EC Habitats Directive requires member states of the EU to “maintain or restore mountain hares to favourable conservation status”, necessitating “surveillance” of the population and encouraging scientific research. The Irish hare is found in abundance at the exact location of this development. The proposed site area is an important habitat for the hare which has been recorded in large numbers. They will frequently come to my front garden in early morning foraging for food and prey. Łopucki et al. (2017) found that the brown hare avoided the interior of a wind energy development and that there was a reduction in the frequency of habitat use measurable up to a distance of 700 m. For these species, which rely on hearing to detect predators, this displacement may be a result of their impaired ability to detect predators, especially where there is high predation pressure.

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“CAEE 8.7 Ensure that proposals for renewable energy developments are considered in the context of relevant EU and national legislation, including in respect of environmental protection. No renewable energy developments will be considered in designated Natura 2000 sites or their surrounding **buffer areas**.” **Scenic view 19 is within 6km of 2 Natura 2000 sites. Under EU law a buffer area is defined as 15km. As per the RCC own development plan no wind farm development should take place within this buffer zone.**

“CAEE 8.9 Ensure that renewable energy developments do not undermine the preservation and conservation of the natural and built environment and that an appropriate balance is achieved between renewable energy development and preservation of the natural environment.”

In accordance with the Department of Environment, Heritage and Local Government guidance (DoEHLG, 2010), an initial distance of 15km from the County boundary should be selected for consideration of Natura 2000 sites.

## 2. Impact on scenery and tourism.

The relationship between tourism and heritage has potential synergistic benefits. The preservation of heritage to improve tourism can in turn support that preservation. The preparation of this submission comes at a time when Fáilte Ireland are emphasising the need for land use plans to manage all land uses and economic drivers of which tourism is but one, in a more holistic, strategic and spatial manner to maximise the efficient use of resources and the achievement of greater outcomes for society at large. Scenic view 19 and other protected views can become part of this for the benefit of RCC. The possibility to establish Lough Ree as a UNESCO Biosphere Nature Reserve and the proposal of a Mid-Shannon Wilderness Park which is to include a proposal of a Lough Ree Visitor Centre would enhance the region and further strengthens our claims to remove view19 as a “favourable location” for wind farm development. The landscape is of high value and should be respected for this and the community that reside in the beautiful landscape.

- *“The Skrine Hill and Limestone Pavement is of High Value reflecting the elevated panoramic views in the direction of Lough Ree to the east and its unique limestone pavement and rock faces. A Scenic View located at the crest of Moydow Hill overlooks rolling farmland, with Lough Ree and Rhindoon in the distance to the east.”* Ref. Valued Landscapes - Roscommon LCA 2014- 2020 & 2020-2027. **“V19”** scenic view point location on map and arrow indicating direction of the scenic view. A red dot indicates on the image where a recent planning application was sought for a wind farm. The red dot is directly in the line of sight of scenic view arrow.



- Any wind farm development would dominate the view and detract from the view of Lough Ree and the surrounding landscape. The impact that any wind farm development would have on scenery and tourism would be severe and lead to mass depopulation of the whole community.
- 3.5 of the Current Landscape Character Assessment (LCA) states:

*“There were some concerns regarding the visual and ecological impact of necessary infrastructure. It is important that the County Development Plan achieves a balance between responding to Government policy on renewable energy and enabling the County’s energy resources to be harnessed in a manner that is consistent with proper planning and sustainable development.”*

- It continues to outline potential impacts:

*“Direct loss of habitat to the developments’ infrastructure”*

*“Degradation of habitats through alteration or disturbance, in particular arising from changes to hydrology that may alter the surface or groundwater flows and levels, and drainage patterns critical in peatlands and river headwaters”*

*“Fragmentation of habitats and increased edge effects; and Degradation and loss of habitats outside the development site”.*

- 3.5 of the Draft 2021-2027 Landscape Character Assessment (LCA) states in relation to Commercial scale wind farms in Roscommon: *“It is also the renewable energy type which has the most significant impact on the landscape when developed.”* *“The Renewable Energy Strategy has been informed by the recommendations set out within this LCA regarding wind energy developments, which are recognised as having potential for a **significant impact** upon the landscape of Co. Roscommon.”*
- Under the Roscommon County Development Plan 2014–2020, Chapter 4: section 4.6.2 “Wind Energy”; Page 115, states, “No wind energy development will be considered on Natura 2000 sites or their surrounding buffer areas. Proposals will also generally be discouraged in or close to pNHA’s, designations, scenic routes and **protected views** and highly sensitive rural landscapes. The Landscape Character Assessment (LCA), undertaken as part of this CDP, provides recommendations which should be taken into consideration in the assessment of applications for wind farm development as well as planning and siting for such development throughout the county”.
- Any proposed development will be positioned centrally in the panoramic vista of **Scenic View 19**, on the crest of Moydow Hill. Any wind farm development would dominate the view and substantially detract from the view of Lough Ree and the surrounding landscape.
- “The landscape of the county has many vantage points which offer attractive views. These scenic views are of an amenity and tourism value and contribute to our quality of life. It is not envisaged that the designation of a protected view would prohibit all development within the view, but any development proposed within the view is required to be designed and located so as not to obstruct the view or be unduly intrusive in the landscape as seen from these vantage points.” Draft Roscommon LCA 2021- 2027. **It is the opinion of the Kilcash and Farbreagues community’s that a wind farm in the location of a protected view will be unduly intrusive.**
- Draft Roscommon LCA 2021- 2027 2.3.1 Studies undertaken in the preparation of the original LCA identified a number of **special places** within County Roscommon. It is considered that the quality of those landscapes continues to **merit special attention** over the period of the Roscommon County Development Plan 2021- 2027 and beyond. Some of the most highly valued landscapes include: “Roscommon town and surrounding areas, including Skrine Hill to the south, due to its unusual geology;” **We believe this LCA33 should be removed from any further wind farm development. It should also be officially given a nature designation.**

- Any proposed wind farm development will have a negative impact on the local environment but due to its size and position it will be detrimental to views from much further afield. “There was general agreement that all elevated areas in the county should be protected as they provide good views (due to the surrounding low landscape).” Ref. Tourism Potential. Roscommon LCA 2014- 2020 & 2020-2027.
  - *“Studies undertaken in the preparation of the original LCA identified a number of special places within County Roscommon. It is considered that the quality of those landscapes continues to merit special attention over the period of the Roscommon County Development Plan 2021- 2027 and beyond. Some of the most highly valued landscapes include: Roscommon town and surrounding areas, including Skrine Hill to the south, due to its unusual geology;”*
  
- An eco and sustainable tourism plan would be a welcome development for the area, using local myths and legends incorporated into a link walkway between Mote Park, Skrine and Kilcash along the protected scenic view 19. There is an abundance of natural flora and fauna along with geology that could be incorporated into this walk. A map of scenic routes, walks and views should be published as failte Ireland document. Our community believe in the continued development of a more integrated and coherent cycling and walking network throughout the County inclusion of view19.
  
- Skrine Castle
  - <https://www.duchas.ie/en/cbes/4811589/4799660/4929947>
  
- Kelly Clan
  - <http://www.kellyclanireland.com/tracing-kelly-ancestors/general-interests/has-anybody-seen?showall=&start=9>
  
- Kellys Mount
  - <https://www.duchas.ie/en/cbes/4811585/4799309>

### **3. Impact on designated NHA/pNHA area from Wind Farm development in Scenic View19**

- In terms of Hydrology and Hydrogeology, according to the GIS map that is extrapolated from the geological survey of Ireland this area of Kilcash lies within an area with a regionally important aquifer of extreme vulnerability. A review of the records of the GSI they have recorded 5 karst features within 250m of View19. These Karst features are enclosed depressions or dolines where the vulnerability to ground waters increases and associated risk of runoff to ground water systems. Such as the vulnerability from disturbing Karst features in other jurisdictions. These Karst features and the historical impact that they have should and must be left undisturbed and the protected view19 maintain protected.
- The scenic view 19 landscape comprises a multitude of significant number of karst features, including vertical shafts, sinkholes, disappearing streams and springs. Groundworks for the construction of a foundation a wind farm development would have a dramatic impact on this area and landscape. It is my belief that no wind farm development would be a viable solution in this location and would be in direct conflict with both that the “EU Water Framework Directive (2000/60/EC) and Annex 1 of the Habitats Directive (94/43/EEC).
- The proposed development is located in the River Shannon catchment area. There are a significant number of dolines in the locality of site including one immediately adjacent to the proposed foundation of the wind turbine. These function to funnel rainfall and runoff vertically down to recharge the aquifer below. Ground water regional flow patterns for the area show a general direction of flow to Lough Ree indicating the development is hydraulically connected to the Lough Ree SAC and SPA protected sites. The Appropriate Assessment Screening has not adequately examined this hydraulic connection to the Lough Ree SAC and SPA;
- In addition to examining Natura 2000 sites, Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHA) which fall within 15km of the County boundary have also been examined. Although NHAs and pNHAs do not form part of the Natura 2000 Network, they often provide an important supporting role to the network, particularly when it comes to fauna species which often do not obey site boundaries. For example, a pNHA/NHA that provides regular feeding grounds for a population of Golden Plover for which a separate site is designated as an SPA plays a role in the maintenance of the species at favourable conservation status for that SPA. In other words, in that example, in order to protect the Natura 2000 network it may also be important to protect the pNHA /NHA which provides a supporting role to it. There are however, NHAs and pNHAs that are designated for features that are not important at an international level and may not interact with the Natura 2000 network.

#### **4. Significant archaeological features within the vicinity of Scenic View 19**

- Scenic View 19 is sited within a diverse selection of archaeological features and monuments. These features include numerous ringforts and monuments just to name a few. It would be disappointing if such as foundations of turbines, underground cabling and access roads, further damaging these features and remain protected.
- On review of the online service provided by the Department of Culture, Heritage and the Gaeltacht, the databases of the National Monuments Service Sites and Monuments Record (SMR) and the National Inventory of Architectural Heritage (NIAH), there are no fewer than 18 sites or monuments of Record within 1km of the proposed wind Turbine. It is obvious based on the density of these sites/ places that any wind farm development would be located in an area of extremely high historical and cultural value.

#### **5. Outdated 2006 guidelines WEDG 2006**

- The 2006 Guidelines, now some 15 years old, the WEDG 2006 may have been appropriate and helpful at a time when wind turbines were much smaller than they are at the present time, and when towers greater than 100 metres in height, and turbines with overall heights greater than 150 metres would have been impossible to construct. Fifteen years ago, 50 metres would have been considered the normal height for a wind turbine tower, and the 2006 Guidelines with a recommendation of a 500 metre set back at ten times the height of the tower would have reflected that level of engineering technology. But technology moves on; and new materials and construction methods have allowed wind turbines to become very much larger, driven by better wind power density at greater heights above ground level, where there is less disturbance to the wind flow as a result of trees, buildings or uneven terrain. The WEDG 2006 are outdated and no longer applicable due to developments in the fields of technology and science
- On 24 April 2017, Westmeath County Council adopted Variation No. 2 to the Westmeath County Development Plan 2014-2020, and this variation was formally incorporated into the Plan on 19 May 2017. The variation introduced new standards for separation distances between wind turbines and residential dwellings, and it amended the County Council's wind energy strategy by inserting a new policy P-WIN 6 into Section 10.6 of Volume 1 of the County Development Plan. Policy P-Win 6 sets out the following minimum separation distances between wind turbines and residential dwellings:
  - 500 metres, where height of the wind turbine generator is greater than 25 metres but does not exceed 50 metres;
  - 1000 metres, where the height of the wind turbine generator is greater than 50 metres but does not exceed 100 metres;
  - 1500 metres, where the height of the wind turbine generator is greater than 100 metres but does not exceed 150 metres; and,
  - More than 2000 metres, where the height of the wind turbine generator is greater than 150 metres.
- The minimum separation distances between wind turbines and residential dwellings, set out in Policy P-Win 6, provide clear and advance information to a prospective wind farm developer as to whether a proposed development will comply with, or will be in conflict with, the Westmeath County Development Plan. The

separation distances in Policy P-Win 6 also provide a choice to a prospective developer to aim for larger wind turbines in areas more remote from inhabited houses, or to apply for permission to construct smaller wind turbines, which would significantly increase the extent of permissible areas where the necessary separation distances could be achieved.

- The Kilcash and surrounding communities support Policy P-WIN 6 in Westmeath County Development plan and would strongly support the inclusion of the same or greater set back distances in any new governmental guidelines and indeed the Roscommon Development Plans.
- The Kilcash and surrounding communities support strategies which aim to develop new technologies for the harnessing and integration of indigenous energy renewable resources such as off shore wind, bio-energy and ocean energy without harming local communities, landscape, wildlife or the environment but taking much greater account of the needs of host communities and allows local communities the opportunity to contribute to the production of renewable energy in a much more cohesive manner.

## **Conclusion.**

We wish to take this final opportunity to commend the RCC on the Draft Development Plan and to acknowledge the important nature conservation objectives which have been included in this draft Plan, to protect and enhance the natural heritage and environment in Roscommon. To reiterate we believe in the best interest of all stakeholders that the protected Scenic View19 stay protected and be removed from any wind farm development. We trust that the above suggestions and observations on the draft development plan 2021-2027 will be considered to implementation and will lead to an improvement of life and to the better protection of our environment.

We as a local community-based group absolutely see the necessity for Ireland to develop its capacity for renewable energy, eliminate the need for fossil fuels, reduce its production of greenhouse gasses and reduce its collective carbon footprint. This is not purely to meet EU targets but for the good of our environment and the planet as a whole. However, this cannot be done through the destruction of our landscape and wildlife habitats with the development of large-scale industrial wind turbines; nor can it be done by the decimation of host communities through depopulation and ill health. We support the development of community led small-scale renewable energy projects, which would contribute to the ‘greening’ of the environment, reduce our carbon footprint, feed into the grid, make each community more responsible for its own energy use and give additional income streams to local farmers, businesses and residents.

**We should be leaders in protecting the flora and fauna of our countryside. We should be leaders in protecting our small communities.**

Yours Sincerely,

Brian Kearney

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Signed on behalf of Kilcash and Farbreagues Community Development Group