

**From:** [REDACTED]  
**To:** [Rses](#)  
**Subject:** Submission  
**Date:** Friday 11 October 2019 15:09:02

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Dear Sir/Madam,

The following is my submission to the Southern Regional assembly plan.

1. Landscapes and Landscape Character Assessment, page 142.

Kerry county council introduced an LCA in 2012 examining the scenery, tourism and recreational values of the county. In relation to the landscape around world famous Ballybunion golf club and Ballybunion beach, on page A-20 of that document it asks the question,

“Is the landscape important for scenery, tourism and recreation” and unbelievably, Kerry county council answered that question with NO.

The same question is asked in relation to the rest of the county and in relation to nearly all the areas in north Kerry, it answers the same, NO.

Carrigafoyle castle, Rattoo Tower, etc – all NO.

This is despite many of these same areas having “designated views” as also recorded in the same document.

The southern assembly has a responsibility to protect north Kerry’s tourism interests and must immediately have this document removed and [call an enquiry into this scandalous affair](#).

Kerry county council, Minister Murphy and others are fully aware of these statements in the LCA but the document remains in place, unamended. 7 years later.

The purpose of the LCA was to ZONE north Kerry for PLANNING purposes, which zoning is being quoted and relied upon by an Bord Pleanala in their decisions. This is PLANNING ZONING introduced based on the above statements in the LCA.

This LCA stymies tourism development and is a disastrous PLANNING ZONING document for the future of north Kerry, not just tourism but also socially and damages the attractiveness of north Kerry as a place to live.

2. Page 135 – 40% electricity to be generated by renewables has now been amended to 70% by 2030.

The Assembly needs to consider the impact on Tourism, society, health, mental health, of the proposed trebling of onshore wind turbine numbers by 2030 to achieve this target.

Reference the Climate Action Plan.

3. Carbon reduction in electricity generation.

The Assembly needs to consider Eirgrids projection of 31% of all electricity by 2025 to be used by Data centres alone. That's the equivalent of 50% of today's National demand. Theoretically to be fuelled by renewables, primarily wind. When the wind does not blow, a massive 50% EXTRA of today's electricity must be fuelled by fossil fuels, purely to power Data Centres.

In my view, this is absurd strategic planning and needs to be examined by the Assembly.

It is to be emphasised that the data centre demand for electricity will be constant, 24/7.

4. Page 136, map of wind turbines in the country.

There is a preponderance of turbines in north Kerry, in fact 275 turbines are sited above the line from Tralee to Castleisland.

225 turbines are permitted INSIDE the EU "protected" Stacks Mountains SPA for the protection of the hen harrier.

30 are sited ALONG the Wild Atlantic Way route between Tarbert and Beale Point.

Failte Ireland is notified by the planning authority of each and every wind farm application. Can they be requested how many submissions they made in respect of planning applications in north Kerry and give planning reference numbers.

Council says the planning process is "plan led rather than target driven". There is NO LIMIT imposed by the planning authority on the number of wind turbines that can be permitted in north Kerry.

The 275 turbines in north Kerry can generate approx 600MWW of electricity, equivalent to 25% of NATIONAL demand at night time. Equivalent to 2/3 of maximum output capacity of Moneypoint.

At what stage does the Assembly intervene and FORCE Kerry county council to change the Landscape Character Assessment and related zoning on which all wind farm applications depends. In fact, the LCA is funnelling all turbines in Kerry into north Kerry.

Can the Assembly introduce a maximum number of wind turbines, solar farms and battery units that can be built in any one Municipal district.

If north Kerry is zoned as suitable for more wind turbines and governments plan is to treble the number of wind turbines in the country by 2030 – even more will be sited in north Kerry, already over populated by turbines.

5. The Assembly needs to consider the new technology of Battery Storage compounds

(BESS).

Following on the footsteps of wind and solar farms is this technology, more correctly titled electricity stabiliser units. The term Battery in my view is a misnomer as it gives the impression that these compounds can store days of electricity supply to keep the country powered when the wind does not blow. Not so. These compounds fully discharge in a matter of minutes.

The public health and safety aspect of needs compounds must be examined by the Assembly as they are prone to fire, explosion based on events highlighted world wide.

A typical compound has 20 battery units and each unit is the size of a 40 foot lorry container.

A total of 191 individual units has ALREADY been permitted in the county by Kerry county council. Not surprisingly, ALL are in north and east Kerry.

6. Kerry county council's submission to the National Framework Plan 2040 outlines their economic development plan for the county.

The area designated for Industrial development is termed the Kerry Hub or the Tralee/Killarney Hub – the entire Listowel Municipal District is EXCLUDED.

The area designated for I. T. industrial development is termed the Knowledge Triangle or Kerry Knowledge Economy Cluster – the entire Listowel Municipal District is EXCLUDED

We have seen that the LCA above has stated that most of the landscapes of north Kerry are “not important for scenery, tourism or recreation” by Kerry county council.

Based on the LCA, north Kerry is zoned for wind farms, some areas deemed “strategic site search area” for wind farms, to the exclusion of most of the rest of the county.

I put it to the Assembly – what is left to fuel north Kerry's economy? Heavily subsidised farming? I cannot see any economic future for north Kerry under these plans in place by Kerry county council.

7. Current position of north Kerry.

A Socio Economic report was prepared by Kerry county council in 2015 which states, page 72,

all State agencies must take action to “correct the WIDESPREAD DEPRIVATION IN NORTH KERRY”.

In my opinion, Kerry county council's economic policies highlighted above will deepen this economic deprivation.

In my opinion, the Assembly needs to take a proactive role in examining the written plans, policies and culture within Kerry county council regarding north Kerry. In my opinion it is IMPOSSIBLE for North Kerry to recover economically based on these plans and policies in

place by Kerry county council. In my opinion, an independent enquiry needs to be called by the Southern Regional Assembly into the above points.

If all of the above is happening and the Southern Assembly is unaware and has not been made aware then I would suggest that there is a systems problem within the Assembly's Environmental Assessment Strategic Function.

Yours faithfully,

[Redacted signature]

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