

SUBMISSION TO AN COIMISIÚN PLEANÁLA

TO: An Coimisiún Pleanála, 64 Marlborough Street, Dublin 1, D01 V902.

RE: Planning Application Case Reference: 324055

Project: Derrynadarragh Wind Farm (Strategic Infrastructure Development)

Developer: Dara Energy Limited

Observer Name: Hugh Corcoran

Observer Address: Kiltaghan, Rathangan, Co. Kildare, R51 CK12

Dear Sir/Madam,

I wish to make a formal observation on the above Strategic Infrastructure Development application and respectfully request that An Coimisiún Pleanála **refuse permission** for the proposed Derrynadarragh Wind Farm.

As a resident of Kiltaghan, I acknowledge Ireland's national renewable energy objectives. However, I submit that the carrying capacity of this rural landscape in west Kildare / east Offaly has already been exceeded. Approving this 9-turbine development would result in unacceptable cumulative, environmental, hydrological, ecological, and amenity impacts. Permission should be refused on the following eight substantial grounds:

1. Strategic Flood Risk and Hydrological Displacement

The proposed site lies within an established flood plain in the townlands of Derrylea and Chevylee, which provides critical natural drainage for the wider region. Severe weather events as recently as late 2025 and early 2026 caused significant inundation of the site. The construction of 9 large turbine foundations and extensive heavy-duty access roads will create substantial impermeable surfaces. This will reduce the land's natural flood attenuation capacity and displace floodwater downstream. The developer has not adequately demonstrated that this will not increase fluvial flood risk to properties in Kiltaghan and Rathangan.

This approach is contrary to the *Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009) and the precautionary approach required in flood-prone areas.

(I have included photos of the area in question from February of this year)

2. Cumulative Impact and the “Maighne Precedent” (Case PA0041)

This application represents a form of project splitting that seeks to circumvent the principles established in An Bord Pleanála's refusal of the Maighne Wind Farm due to its ribbon-like layout and disproportionate concentration of turbines.

When considered alongside the operational Cushaling (9 turbines), Moanvane (12 turbines), Cloncreen (21 turbines), and Mountlucas (28 turbines) wind farms, and pending applications for Derrygreenagh (25 turbines), Drehid (11 turbines), and Clonarrow (4 turbines), the result would be approximately 120 industrial turbines in the immediate area. This would create an unbroken industrial corridor and “industrial fatigue,” permanently degrading the rural character of west Kildare and east Offaly.

The Kildare County Development Plan 2023–2029 (Appendix 2 – Wind Energy Strategy) emphasises the need for proper assessment of cumulative landscape and visual impacts. Recent comments by Offaly County Councillors have highlighted the same concern, questioning “at what point will enough be enough?” The incremental “salami-slicing” approach undermines the integrity of the planning system and previous landscape character assessments.

3. Ecological Encroachment on the Umeras Bog Sanctuary

The site directly borders Umeras Bog, a peatland area of national importance currently being developed as the Umeras Peatlands Park. This area functions as a documented sanctuary for the Red-listed Eurasian Curlew and a vital foraging corridor for the Annex I-listed Hen Harrier, as well as Whooper Swans.

Turbines reaching 187m in height would pose a significant collision and displacement risk to these protected species. Recent national surveys show catastrophic declines: the Eurasian Curlew breeding population has fallen by approximately 98% since the 1980s, while the Hen Harrier population has declined by one-third since 2015, with only 85 confirmed breeding pairs remaining nationally.

I urge the Commission to apply the **Precautionary Principle** under the Habitats and Birds Directives. Industrial development of this scale is incompatible with the objectives of the NPWS Curlew Conservation Programme and the protection of this sensitive ecological corridor. The developer’s proposed mitigation measures remain unproven at this height and in this location.

4. Peat Stability and Loss of Carbon Sequestration

Construction on water-logged peat soils will require intensive excavation and piling. This will release substantial volumes of stored carbon, directly undermining Ireland’s Climate Action Plan targets. There is also a material risk of peat instability or “bog bursts” on this delicate hydrological terrain, which could threaten local infrastructure and environmental safety.

The EIAR has not sufficiently addressed these risks.

5. Impact on Local Water Quality, Residential Amenity, Noise and Shadow Flicker

Residents in Kiltaghan rely on private bored wells. Piling and sub-surface vibration on boggy terrain risk contaminating or disrupting local aquifers. The EIAR has not provided adequate guarantees for the protection of these private water sources.

In addition, the assessment of operational noise, low-frequency vibration, and shadow flicker relies on the outdated 2006 Wind Energy Guidelines. In this low-background-noise rural environment — already hosting multiple wind farms — cumulative effects could lead to sleep disturbance and reduced residential amenity, particularly during periods of atmospheric stability common in this flat landscape.

When combined with the significant loss of visual amenity, this development would impose an unacceptable burden on a community that has already contributed more than its fair share to national infrastructure. A proposed community benefit fund cannot adequately mitigate these permanent and ongoing impacts.

6. Reliance on Obsolete 2006 Wind Energy Guidelines and Policy Vacuum

The application is assessed against the 2006 Wind Energy Development Guidelines, which are 20 years old and were drafted for significantly smaller turbines. The Government's prolonged delay in finalising updated guidelines (now referred to as a National Planning Statement) is a clear indication that the 2006 standards are no longer fit for purpose for modern 187m turbines.

It is procedurally unfair to determine this application using outdated noise, setback, and other assessment criteria. I respectfully request that permission be refused, or at minimum deferred, until the updated National Planning Statement is adopted so that a decade of public submissions can be properly reflected.

7. Violation of Protected Views and Impact on the Barrow Blueway / Grand Canal Greenway

The Kildare County Development Plan 2023–2029 explicitly protects the scenic qualities of the Grand Canal corridor, including views from Umeras Bridge.

The proposed 187m turbines would severely degrade the visual amenity from this protected vantage point and from the newly developed Grand Canal Greenway and Barrow Blueway. Over the proposed operational period, the industrialisation of the horizon would destroy the “sense of place” and tranquillity that these high-value recreational and tourism assets are intended to deliver. This is contrary to the landscape protection objectives of the Development Plan.

8. Inadequate Decommissioning and Site Restoration Provisions

The proposed development is located on sensitive peatland. Historical examples in Ireland, most notably the Derrybrien wind farm, demonstrate that construction on peat can cause long-term hydrological disruption and extremely costly remediation failures. The application does not appear to provide robust, adequately bonded financial guarantees for full decommissioning and restoration of the site to its pre-development peatland condition after the operational period (sought for 10 years, with operation proposed for up to 35 years). There is a significant risk that the local community or the taxpayer could ultimately bear the cost of incomplete restoration. This is contrary to the polluter-pays principle and the requirements of proper planning and sustainable development.

Conclusion

For the reasons set out above, the proposed Derrynadarragh Wind Farm does not constitute proper planning and sustainable development of the area. The cumulative, hydrological, ecological, amenity, and long-term legacy impacts are unacceptable in a landscape that has already accommodated a disproportionate level of wind energy infrastructure.

I therefore strongly urge An Coimisiún Pleanála to **refuse permission** for this application.

Yours faithfully,
Hugh Corcoran
Kiltaghan
Rathangan

Co Kildare
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