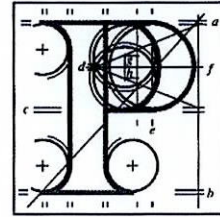


**Our Case Number:** ABP-314602-22



**An  
Bord  
Pleanála**

Olive Creed  
An Coiste Forbartha  
Ceimcorabhuaile  
Ballingeary  
Co. Cork

**Date:** 18th November 2022

**Re:** Wind farm development of 14 turbines with 110kV electrical substation and all related site works and ancillary development.  
The townlands of Cahernacaha, Gortnabinna, Derryfineen, Gortyrhilly, Rath West, Derree, Fuhiry, Derreenaculling and other townlands, Co. Cork and Derryreag, Cummeenavrick, Glashacormick, Clydaghroe and Cummeennabuddoge, Co. Kerry.

Dear Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

A receipt for the fee lodged is enclosed.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of Cork County Council and Kerry County Council and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime, please contact the undersigned officer of the Board.

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,



Doina Chiforescu  
Executive Officer  
Direct Line: 01-8737133

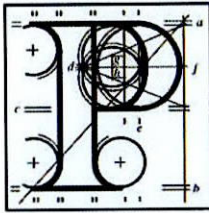
PA04

Teil  
Glao Áitiúil  
Facs  
Láithreán Gréasáin  
Ríomhphost

Tel (01) 858 8100  
LoCall 1890 275 175  
Fax (01) 872 2684  
Website [www.pleanala.ie](http://www.pleanala.ie)  
Email [bord@pleanala.ie](mailto:bord@pleanala.ie)

64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902



## Observation on a Strategic Infrastructure Development Application

### Observer's details

#### 1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's  
name

These observations are submitted with the support of the committee of An Coiste Forbartha which is our local community development group approved at a recent committee meeting held on 03/10/2022

Chairperson: Tadhg Ó Duinnín

Connie and Olive Creed P12CK06,

Gearóid and Reidin Creed, P12H940

Michael and Joan Anne Creed P12D512

Tadhg Creed P12VF68

Tommy & Eithne Sweeney P12VX79

Eamonn & Vania Sweeney P12T681

(b) Observer's  
postal address

Ceimcorabhuaile, Ballingearry, Co. Cork



## Agent's details

### 2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

N/A

(b) Agent's postal address

Click or tap here to enter text.

## Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

The agent at the postal address in Part 2

## Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation.

- (a) **An Bord Pleanála case number for the current application (if available)**  
(for example: 300000)

313440

- (b) **Name or description of proposed development**

Gortyrhilly Wind Farm

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Gortyrhilly, Ballyvourney, Co. Cork



## Observation details

### 5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word limit** as the box expands to fit what you write.

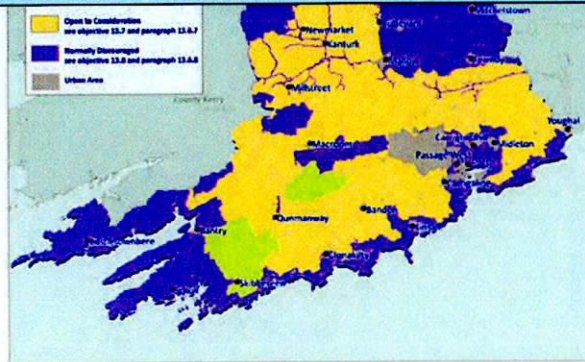
You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

The proposal to put 14 wind turbines of 186 metres in height is unacceptable as it is in direct conflict with the Cork County Development Plan which came into effect on the 6<sup>th</sup> June 2022:

Chapter 13 deals with Energy and Communication:

- Section 13.6.8 states "*Normally Discouraged: These areas (coastal areas, some areas in North Cork, Cork Harbour, and the Lee Valley) are normally not suitable for commercial wind farm developments due to their overall sensitivity arising from ecological, landscape, amenity, recreational and settlement, considerations*".
- The site is located in the **Upper Lee Valley**, in an area of striking scenic beauty, with ancient boglands and sites of historical importance The Beara Breifne way/Slí Gaeltacht Muscraí passes through the village itself and the presence and proposed presence of windfarms reduces the attractiveness to walkers, cyclists and other recreational users seeking to "get away from it all"
- It is undeniable that the construction of this wind farm would provide a highly intrusive, visually domineering form of development that devalues the integrity and the landscape character.
- Figure 13.3 (shown below) clearly identifies areas that are 'open to consideration' for positioning of windfarms. The map shown below shows approximately 50% of the whole county could be selected as areas for on shore wind farms, yet this small village appears to be disproportionately singled out for Wind Farm Development.

## 5. Grounds



- Section 13.6.3 states that, “*The location of all existing and proposed wind energy developments and their cumulative impacts*” would be taken into consideration when identifying suitable locations for wind farms. There are currently more than **35 wind turbines** circling the tiny village of Ballygeary, we believe that any further plans for windfarm development require the most scrupulous attention to the **cumulative** impacts.

The recent concession by An Bord Pleanála of the Judicial Review case ABP 308244-20 for a seven turbine windfarm with battery storage within sight of the currently proposed location shows the sensitive nature of the local landscape, and should emphasise the importance that such applications in this place be given due consideration by the Board and its Inspectors.

This community considers that it has taken more than its “fair share” of wind turbines and feel that we should not have to constantly oppose more and more cumulative wind farm development

- FutureEnergy in their community consultation for the proposed Gortyrhilly Wind Farm stated that their photomontages accurately depicted the visual impact of the turbines on our landscape. Below is one of the photos.



## 5. Grounds



On closer examination it is realised that these photomontages do not accurately represent the visual impact. It is apparent that the photo was taken from a low lying area where the trees and fauna actually blocked out many of the proposed turbines.



As this rendition does not show the wind turbines currently in place (Cleanrath), it was very difficult to ascertain the true impact of the proposed wind farm.

We requested more detailed visual representations showing Cleanrath Wind Farm along with the proposed turbines. We then received this drawing (see below)



The size of the proposed turbines, especially the super-sized blades, when compared to the existing wind farm shows exactly the detrimental effect the proposed wind farm would have on our landscape. What is very clear also is the density of the turbines, they are clumped together. Turbine 1 (T1) the first on the left is by far the tallest and most visually domineering of the turbines.

- At a time when farmers are being penalised for damaging and removing peat from boglands along with proposals from the EU to 'rewet' all the reclaimed boglands, it could only be termed as regression to allow such destruction of this undisturbed, bogland habitat at Gortyrhilly.



## 5. Grounds

Having observed the development of nearby wind farms, along with aerial views of Grousemount Wind Farm, the disruption to the environment has been huge, with miles of roadways being built to accommodate large machinery and vehicles. Some of the roads are twice the width of national roads. These wind farm roads need significant drainage on both sides which in turn is drying up the surrounding wetlands. The substantial amount of embodied carbon related to groundworks between roadways and construction of the turbine bases is detrimental and its impact should be taken into account when considering any related planning application..

In Scotland wind farms were traditionally built on boglands because of land affordability. However, due to environmental damage, they were moved off wetlands to drier more suitable land in order to reduce carbon footprint. Gortyrhilly is essentially a pristine, wet bogland.

- Loss of and disruption to phone and TV signal has been experienced already from previous construction of wind farms in this area. We believe that further interruption would be inevitable.
- Opposition to the project reflects a wide spectrum of views, including those who support wind energy but are appalled by the erosion of public trust which arises from this kind of poor decision-making in allowing planning for such developments in sensitive and already saturated locations
- Noise pollution is a very real concern. Presently we can hear the turbines from Grousemount in Co. Kerry along with the local ones. This will only be exacerbated by the proposed 14 turbines.
- Houses in our locality are currently experiencing flicker from nearby turbine blades. More turbines mean more flicker.
- The red light pollution is also a very real issue of concern for people in our locality. While FuturEnergy state that in the future these lights will not be needed as technological advances are being made, we know that several of the proposed turbines would have these lights thus adding to the 'alien' like vista seen at night around our village
- The environmental damage caused by establishing these wind farms is considerable each turbine requires 1,000 cubic metres of concrete per foundation (poured and driven piles). As a community we are worried about the impact of this mass concrete on our water table.



## 5. Grounds

- A shift to wind energy has created a 'Green Paradox' as one of the key components in the construction of wind turbine blades is balsa wood. Balsa is a tropical wood known for its flexibility yet it is strong, it is light yet resilient. As European governments push for more renewable energy sources, the demand for balsa has exploded. Ecuador exports 75% of the global market of balsa and the rampant demand for this product has led to deforestation of rainforests. This coupled with the difficulty experienced in the disposal of the turbine blades when decommissioning occurs is truly alarming. The destruction which would be caused to provide access to the Gortyrhilly site as well as running the underground cables to connect the wind farm to the grid would be devastating. This leads to the Green Paradox as mentioned above. The international commitment to renewable energy has left a trail of deforestation and destruction in its wake.
- In a study it has been reported that the average wind speed in Ireland has dropped in recent years. The study entitled "Climate change impacts on wind energy generation in Ireland" (2021) the researchers Eadaoin Doddy Clarke et al concluded that climate change is lowering average wind speed year on year and that "*The overall results of a reduction in wind energy generation indicate that a continuously developing renewable energy system is necessary to maintain a stable and secure method of meeting society's demand for electricity*". There is an over reliance on wind power in Ireland, there are alternatives.
- Local families continue to experience severe problems when trying to remain settled in the place they were born. It is ironic that members of our community are routinely denied planning permission to build homes but developments like this are allowed to dominate the landscape.
- In section 9.2.1 of the Bord Pleanála's Inspector report it states, "*The construction impact in terms of employment and economic activity is likely to be significant*". As seasoned observers of wind farm construction in our locality we can safely say that outside agencies are employed to construct the farms and once established, the employment of operators is minimal and certainly not local. No local person has been employed in Cleanrath Wind Farm.



## **5. Grounds**

In summary we recommend that the Board refuse this application for the following reasons:

- It violates the Cork County development plan
- It ignores the cumulative impact of already constructed Windfarms on this high value landscape
- It ignores the cumulative impact of noise and flicker and night time light pollution on the lives of local residents
- It ignores the fact that it will reduce the effectiveness or even destroy the carbon sink that is an area of pristine bogland
- It does not take account of the embodied carbon in construction
- It ignores the fact that average wind speeds are decreasing due to climate change

## Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

## Fee

7. You **must** make sure that the correct fee is included with your observation.

### **Observers (except prescribed bodies)**

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request



## Oral hearing request

8. If you wish to request the Board to hold an oral hearing, please tick the “Yes, I wish to request an oral hearing” box below.

You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

No, I do not wish to request an oral hearing

## Final steps before you send us your observations

9. If you are sending us your observation using **the online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

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**For Office Use Only**

<b>FEM – Received</b>		<b>SIDS – Processed</b>	
Initials		Initials	
Date		Date	

**Notes**