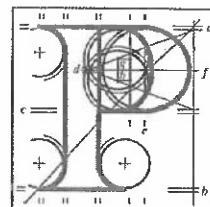


**Our Case Number:** ABP-316025-23

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Andrew Devennie  
82 Kingswood Stockon Road  
Stockon  
New Jersey  
USA 08559

**Date:** 11 May 2023

**Re:** Wind energy development including 19 turbines and all associated works.  
Townlands of Clogherachullion, Cloghercor, Derryloaghan, Aghayeevoge, Cashelreagh Glebe,  
Darney, Drumard, and Drumnacross Co. Donegal

Dear Sir / Madam,

An Bord Pleanála has received your observation or submission in relation to the case mentioned above and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

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 the Local Authority and at the offices of An Bord Pleanála when they have been processed by the Board.

For further information on this case please access our website at [www.pleanala.ie](http://www.pleanala.ie) and input the 6-digit case number into the search box. This number is shown on the top of this letter (for example: 303000).

Yours faithfully,

Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

BL50A

**Tell**  
**Glaao 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

Attn: An Bord Pleanála  
RE: **OBSERVATION:** Case Reference: PA05E.316025  
Cloghercor Wind Farm – (SID Application)

To The Honorable Reviewers of An Bord Pleanála,

I am the American-born son of an Irish father who is from the Town of Doochary; I have spent much time there with family. As such it was within my deep interest to review the SID application set forth by Cloghercor Wind Farm Ltd. to intervene upon approximately 1,945 hectares of lands along the Gweebarra River, and thereafter, to submit my observations and objections.

The summary of my observations into the applicant's submitted documentation related to the proposed wind farm development centers on my shock as to its scale. Additionally, I am shocked as to its proximity to the ecologically sensitive Gweebarra River Valley, and the homesteads along its northern banks between Doochary and Lettermacaward. **I vehemently object to the proposed wind farm for the following reasons, considered in my review of the application.**

**Borrow Pit Volume and Earth Movement:**

While most focus on harrowing image of 200m tall turbines lining the landscape, this creates cause to overlook an equally scalar monstrosity occurring at the ground level. The wind farm development is based upon a site intervention centered on earthwork. In addition to earthen cuts and fills required to facilitate level, suitable building pads for multiple electrical substations and worker support infrastructure along the hillsides, the 200m tall wind turbines are scheduled to receive shallow mat extensions as their foundation. (RE: 8.4.2.7) Each of these turbine foundations will require a massive excavation across a sloped terrain, to facilitate cast-in-place concrete pads. Each location has the capacity to encounter unsuitable ground conditions requiring rock-removal (blasting) and/or rock anchoring, and removal of organic soils. Across 19 various locations along the sensitive landscape, the extent of the earthwork required to implement these footings to suitable substrate, or the effectiveness of the proposed erosion control measures required **can not truly be known at the planning approval stage.** (All estimates have been identified as conservative in the report.) While a smaller quantity of wind

turbines of a smaller scale and size could warrant an approval whose limits of borrow-pit volume and erosion could be reasonably understood, the scale of this development is not.

#### **Proximity to Gweebara River:**

**Prior to any in-depth analysis of the superfluous engineering details in the Applicant's support of submission, it should be plainly stated that due to its proximity to the river and its parallel sprawl along the river to its upper banks, the site selection is simply and fundamentally flawed.**

The scale of earthwork proposed by the application occurs across a heavily sloped terrain whose rainwater runoff drains immediately and unavoidably into a sensitive river estuary. This site location is presently pristine as stated in Section 8.3.8. This intervention presents an enormous risk to the river by virtue of its scale and its location.

#### **Shadow Flicker:**

The shadow flicker analysis identified approximately 100 sensitive dwelling properties that would be affected. (This does not include any proposed developments.) It should be noted that the key plan (Figure 10-1: Shadow Flicker Assessment Area) which identifies these properties is presented in an illegible scale and the individual tags are not discernible.

The basis of this analysis, wherein shadow flicker is said to have an 'effect' within 'a distance of ten rotor diameters as a maximum limit,' is entirely predicated upon what the Applicant refers to as 'industry standard.' The validity of this industry standard to favor those affected is not elaborated upon in the application and as such, the most central point of consideration of this application as it bears upon the wellbeing of the adjacent residents **can not be known at the planning approval stage.**

Additionally, in seeming admission and anticipation of the shadow flicker effect on sensitive dwellings, hardware has been implemented on each turbine to identify and cease operation during shadow flicker; all consistently calibrated to 'industry standards' and 'predictions' whose subjective leanings are not made known in the Applicant's submission.

Additionally, per Section 10.5.1, the Applicant states that, "A process will be established by the wind farm operator whereby local residents can highlight any concerns or complaints about the operation of the (mitigation) scheme. All concerns raised will be investigated by the wind farm operator and the turbine shutdown software adjusted accordingly, as required." As this issue is the most central point of consideration of this application as it bears upon the wellbeing of the adjacent residents, this 'process'

should be made known at the planning approval stage and should not be solely established at the discretion of the wind farm operator. In the least, an impartial entity should be identified to facilitate an objective accountability at the planning approval stage.

**Noise:**

Following a fount of information regarding temporary construction noise, Section 12.6.2.1 of the Applicant's submission offers the following analysis of predicted residual operational turbine noise effects:

**Negative in Quality; Moderate in Significance, Long-Term in Duration.**

These are claimed to be within 'best-practice' limits.

It should also be noted that mitigation measures for operational noise and vibration, apart from loosely referring to implementation of a reduced operational mode, are not specifically identified in the Applicant's submission; rather, the documentation in section 12.4.4.1.3 states that, "A detailed curtailment strategy matrix will be finalized as part of the detailed design for the selected turbine technology to achieve the noise criteria at each of the noise sensitive locations." This curtailment strategy can not be known or established at the planning approval stage.

In summary to the above, I am at a tremendous loss to singularly combat the entirety of this massive catalogue of self-fulfilling engineering analyses. I can only do as I have done in enumerating the small, potentially unconsidered points above, which illustrate that amongst this elaborate and impressive collection of research, some very important facts have been de-emphasized and buried therein.

Lastly, I would like to set forth a human perspective and an observation of deep value uncaptured amongst the science, and the math; a perspective which permits me to cast my gaze upon the undeveloped hills of the Rosses, and to see the perfect scale and order of what God has intended, and in that intrinsic, infinite joy, to rightly know my place. I object to such things as this Application, such that the heritage of my soul experienced through the eyes, found there amongst the perfect hills and rivers of the Rosses, may remain for our common joy and the joy of others. For the sake of our connection with those precious Irish landscapes, may they be preserved as they are.

Thank you for your consideration.

Sincerely,

**Andrew (ODuibheannaigh) Devennie**

82 Kingwood Stockton Road  
Stockton, New Jersey, USA 08559