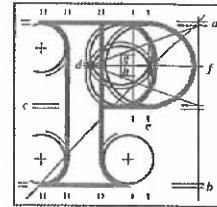


**Our Case Number:** ABP-316025-23

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Irish Wildlife Trust  
c/o Pádraic Fogarty  
Sigmund Business Centre  
8 Cabra Road  
Dublin 7  
D07T1W2

**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

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

|                      |                       |
|----------------------|-----------------------|
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An Bord Pleanála  
Marlborough Street  
Dublin 1

May 8<sup>th</sup> 2023

Case Reference: PA05E.316025  
Cloghercor Wind Farm 19 no. wind turbines and all associated infrastructure

The Irish Wildlife Trust (IWT) is a national non-governmental organisation, which was founded in 1979 and aims to protect Ireland's rich natural heritage.

We would like to make an objection to the proposal to erect 19 wind turbines on a site in Co. Donegal, referred to as the Cloghercor Wind Farm. The IWT is not against renewable energy developments, indeed these are essential if we are to move beyond fossil fuels in the fight against a changing climate. Nor are we against wind energy, which can make a contribution to the renewable energy mix if suitably located. This objection is based on a number of points:

- Erecting wind turbines on peat bogs for the purposes of reducing CO<sub>2</sub> emissions is counterproductive. Research published in the prestigious journal *Nature* in 2012 stated that “wind farms on peatlands will probably not reduce emissions, unlike those on mineral soils”<sup>1</sup>. While we accept that the peat on the Cloghercor site is already degraded from drainage and forestry operations, if the goal is greenhouse gas emissions reductions, then restoring the bogland must be prioritised over developments which add further to the degradation while foregoing any future potential for restoration. The EIAR shows that the entire site is overlain by blanket peat, a hugely important store of carbon and a critical carbon emitter. Wind farm development will ensure that this landscape continues to emit greenhouse gas emissions indefinitely.
- In May 2019, the Dáil declared a climate *and biodiversity* emergency. These are separate but intertwined issues. We cannot stabilise the ecological system if decarbonization is pursued to the detriment of biodiversity and ecosystem protection.
- In April 2023, the Citizens' Assembly on Biodiversity Loss asserted that the State had “comprehensively failed to adequately fund, implement and enforce existing national legislation, national policies, EU biodiversity-related laws and directives relating to biodiversity. This must change.” It said that the “remits of Bord na Móna and Coillte must each be reviewed to include a focus on peatland restoration and rehabilitation projects, with targets outcomes for biodiversity conservation” and that renewable energy developments must not “negatively impact biodiversity”.
- Given the catastrophic peat landslide that occurred at Meenbog, Co. Donegal in November 2020, which was granted planning permission despite numerous warnings and objections on

<sup>1</sup> <http://www.nature.com/articles/489033d>

environmental grounds, is still subject to investigation by a number of authorities. These objections, including from the Irish Wildlife Trust, highlighted the importance of prioritizing the restoration of peatlands over renewable energy. We believe that any decision at the Cloghercor site is premature while the investigation at Meenbog is underway.

- Wind Energy Development Guidelines, under review by the Department of Housing, Local Government and Heritage for some years, have yet to be published. Meanwhile the Donegal County Development Plan 2018-2024 says that “Special Areas of Conservation (SAC's) and Special Protection Areas (Natura 2000) sites, Natural Heritage Areas, areas identified as **high and medium landscape sensitivity**, areas of Fresh Water Pearl Mussel including the catchments identified in the Sub-Basin Management Plans for Clady, Eske, Glaskeelin, Leannan, Owencarrow and Owenea (as listed in S.I. 296 of 2009), important views and prospects, among others. It is considered that these areas have no capacity for wind energy development.” It is noted that Map 7.7.1 of the County Development Plan identifies the Gweebarra Valley as of ‘especially high scenic amenity’.
- While Policy NH-O-11 of the CDP is: To ensure the conservation and management of Peatlands in the County.
- New research<sup>2</sup> shows that “the development of windfarms on peatlands is affecting their morphology, hydrology, ground-level climate conditions, carbon functions and vegetation” while Ireland already has one of the highest concentrations of wind turbines on blanket bogs in Europe, a habitat the researchers describe as “particularly vulnerable”. In essence, and despite that fact that much of the blanket bog in this area has been damaged by misguided attempts at commercial afforestation, ecological restoration is the best long-term approach for climate, biodiversity, water quality and people.
- The need for this project has not been outlined to a sufficient degree. The government has offshore wind energy generation targets of 7GWs by 2030 while industry estimates that there is potential in the offshore area of 30GW. This is far in excess of the projected needs of the country and so the industry is expecting to serve an export market in the coming decades. Small, piecemeal projects, like that proposed at Cloghercor, are therefore not required to meet our national targets. The industrialisation of the uplands and the opportunity for ecological restoration that is forgone is too high a price for the negligible benefits this project might accrue.
- The project poses an unacceptable risk to Golden Eagles, which are ‘red listed’ by BirdWatch Ireland due to their continued high risk of extinction. Golden Eagles hunt over large areas and the risk of fatal collision with turbine blades on this site is too great so near to their core area around Glenveagh National Park. The EIAR shows that that proposed wind farm site is a part of Golden Eagle territories and were “regularly occurring” (fig 7-8) and is close to possible nesting territories. It is clear from the presented analysis that Golden Eagle would use this landscape more if cumulative pressures were eased. Figure 7-9 shows that the wind turbines are located within the home range of a potentially breeding pair.
- The EIAR shows that the development site is within the flight path of Whooper Swans, a species at high risk of collision while evidence of breeding Golden Plover, another ‘red list’ bird, was also presented. Merlin, Peregrine, Kestrel, Snipe, Teal, Osprey, White-tailed Eagle and Red Grouse were also noted. These are all birds of conservation concern and their protection/recovery is not compatible with wind turbine installations.
- The project poses an unacceptable risk to the population of Atlantic Salmon, which is a qualifying interest of the West of Ardara/Maas Road SAC (0197). The potential for sediment pollution from tree felling, road and plinth construction and quarrying on its own should be sufficient reason to refuse permission for this project as it is likely that significant effects will occur to the integrity of the SAC. The Gweebarra is one of the few rivers left in Ireland with a population of Atlantic Salmon that meets its ‘conservation limit’ (i.e. a population that allows for recreational angling) according to Inland Fisheries Ireland, while the species nationally is threatened with extinction. Cumulative impacts, including from wind farms, are contributing to the demise of this iconic fish. Water quality in the Gweebarra Estuary is assessed as ‘high’ and

<sup>2</sup> <https://www.nature.com/articles/s41598-023-30752-3>

it is critically important that this be maintained, given that nationally water quality continues to deteriorate, according to the Environmental Protection Agency.

- The West of Ardara/Maas Road SAC (site code: 0197) practically borders the project site. Habitats which are qualifying interests of this SAC (blanket bog, wet heaths and dry heaths) have all been assessed at a national level as 'bad'. There is no data as to the specific status of habitats in the SAC. Wind power developments were identified by the NPWS as of 'medium' pressure/threat significance to the status of these habitats<sup>3</sup>. While the proposed wind farm is removed from areas of bog within the SAC, it remains a part of the peatland landscape of this part of west Donegal and priority should be given to restoration of blanket bogs wherever they occur.
- The uplands of the west Donegal landscape have been subjected to multiple pressures over many years that have left its ecology in a degraded condition. This low baseline of biodiversity, which has led to a phenomenon known as 'shifting baseline syndrome', can blind us to the potential of landscapes to support thriving populations of wildlife as well as healthy, ecologically functioning habitats. The continued piecemeal development and creeping industrialisation of the uplands however reduces this opportunity. An alternative vision, and one which is not considered in the EIAR, is the ecological restoration and rewilding of this landscape so that it restores biodiversity, ecological function, carbon sequestration and hydrology while simultaneously boosting amenity value and sustainable economic opportunities for local people.

The Gweebarra Valley is a landscape full of potential as an outdoor/nature-based destination. However, its habitats and landscapes have suffered degradation in recent decades from poorly located forestry, inappropriate agricultural practices, built development and – increasingly - piecemeal installations of wind farms. The IWT urges An Bord Pleanála to refuse this application so as not to contribute further to these insidious cumulative effects.

Yours sincerely,

Pádraic Fogarty

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<sup>3</sup> NPWS (2019). The Status of EU Protected Habitats and Species in Ireland. Volume 2: Habitat Assessments. Unpublished NPWS report. Edited by: Deirdre Lynn and Fionnuala O'Neill