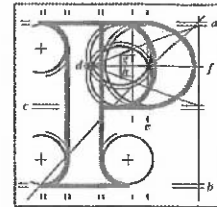


Our Case Number: ABP-316025-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

William and Kim Cunningham
Derryleconnell
Doochary
Co. Donegal

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 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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An Bord Pleanála
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William & Kim Cunningham
Derryleconnell
Doochary
County Donegal

Submission on Planning Application Number 316025 Cloghercor Windfarm.

We, William and Kim Cunningham wish to register our objection to the above planning application 316025 as detailed below.

We live approximately 1.5km from the nearest proposed turbine and have extensive views over the proposed site both from within our home and from the outside areas (garden and yard).

The Planning Statement Executive Summary is at pains to claim how the proposed development will contribute significantly to Ireland's ability to meet National and European Energy targets, with emotional references to the war in Ukraine and our need to increase renewables capacity and also the statement that "The wind farm will supply sufficient electricity to power between 56,590 and 81,488 households with electricity each year, the equivalent of all households across County Donegal." It could be noted that the Irish Wind Energy Association (IWEA) submission to the Preparation of the Draft Donegal County Development Plan 2018-2024 claims that "IWEA recognises the significant contribution Donegal County Council has made to the existing onshore wind farm fleet in Ireland to date. Currently Donegal has 392MW of installed wind energy capacity, enough to power 250,000 homes. In fact, Donegal is home to 13% of Ireland's total installed capacity". The county already has enough installed capacity to power 3 – 4 times the equivalent number of homes in the county. I suggest Donegal is being overburdened with windfarms to the detriment of the local environment and amenities and its population. Indeed Minister Eamon Ryan when interviewed on Highland Radio said that Donegal had reached saturation point regarding wind farms.

The increased drive by multinationals and their investors for more (very profitable) renewables and increased capacity citing climate targets as their main factor should not be allowed to override the needs and wishes of local residents, Donegal County Council and the County Development Plan, the protection of the local environment and the effects on the greater surrounding area in which this proposed development sits.

We would also draw attention to the refusal of planning application 10/30221 which covered some of the same townlands as this proposed development.

Having read the Planning Application including the Planning Statement, EIAR and Natura Impact Statement and considering what we have raised in the preceding paragraphs we would like to make the following observations.

1. Visual Amenity.

The LVIA chapter 13 of the planning application Figure 13.4 shows a map of scenic amenity in relation to the proposed development, Figure 13-8 ZTV shows the theoretical zone of visibility to 20km radius.

While turbine bases may all be placed within the boundaries of an area designated as MSA the turbine towers and rotors being among the tallest structures in the country, towering to tip heights of 200m, it is clear that from most vantage points within the Gweebarra Valley, many viewpoints within the numerous SPA's and SAC's in close proximity, from many parts of the Wild Atlantic Way and local roads and from within much of Glenveagh National Park the view of the turbines will dominate and obstruct the view towards HSA and EHSA areas, dominate distant views and present substantial skylining. This is clear when one considers that the lowest turbine stand, that of turbine 1, is at an elevation of approximately 60m. The other stands range in altitudes of up to 160m. This places the tip of the rotors at heights of between 260m to 360m, which is higher than the hills surrounding them except for the peak at Croaghleheen (380 – 385m), although viewing from the L1783 road on the north bank of the Gweebarra River opposite the site which at its highest point is less than 60m elevation will present substantial skylining of all turbines along its entire length, including against Croaghleheen. Had the ZTV extended another 5km it would show that all 19 turbines would be visible from the offshore islands and many additional coastal areas. This is clearly the case when the photomontages submitted with the application are examined.

Chapter 13.7.1 refers to effects on the Gweebarra Bridge Protected View (VP20). There are two aspects to this protected view, one to the north-east towards the proposed development and the other 180° in the opposite direction south-west. This chapter claims the visual impact is moderate at VP20 and also that there is already a view of a windfarm from VP20. The view south-west only reveals three turbines from the northerly end of the Gweebarra Bridge and is hidden at the southerly end where the parking and facilities are located. This is not the case with the view upriver north-east where the proposed turbines would be the dominant feature in this view of the landscape and present skylining for any observer whether static or moving and should be classed as having substantial impact. In this case it could be considered that the cumulative effect of the views would raise the magnitude of the cumulative effect to a high or a very high rating (Table 13-8).

In fact, it could be suggested that most of the viewpoints 1 – 29 could reasonably have a higher impact rating than they have been allocated in table 13.7. The photomontages especially those at any distance do not reflect the scale of the impacts as the method used to produce the simulated photographs seem to introduce a heavy misting effect to distances which does not represent normal real world viewing conditions in the area. The downplaying of the effects on the views in some paragraphs is absurd such as regarding VP5, "The proposed turbines will be visible at a notable scale to the south and will be a prominent feature of the southerly and south-westerly view, albeit they will only occupy a visual envelope of approximately 20 degrees in this sweeping panoramic view. The proposed turbines present in a legible manner, do not intrude on the main aspect of scenic amenity and do not appear overscaled or inappropriate in this landscape that comprises broad landscape features and land use patterns. As a result, the proposed wind farm will not generate significant visual impacts at this scenic designation, and instead, the visual impact significance was deemed Moderate". This does not make sense in an area with little development where the turbine tips would range in elevation between 260m to 360m and to be higher than all of their surrounding features, of course they would be the most prominent feature in

the landscape and even the most casual observers eye would be drawn towards them and they would represent a great visual distraction in the field of view.

Similarly regarding VP20, "The nearest and most relevant scenic designation to the proposed wind farm is the Gweebarra Bridge protected view, located some 4.4km west of the site and is represented by VP20. The scenic designation encompasses views east and west from the Gweebarra Bridge across the Gweebarra River corridor, estuary and surrounding rolling landscape. The proposed turbines are viewed to the east and will be visible some 4.4km upstream to the south of the river corridor. Nonetheless, the proposed turbines will not have a highly prominent visual presence from this scenic view designation, and furthermore, wind turbines are partially visible in the distance in the western aspect of this scenic designation. Thus, this scenic view is already influenced by views of wind energy development, and therefore the proposed turbine will not appear as new and uncharacteristic features. Whilst the proposed turbines are likely to catch the eye of the casual observer in this view, they will not contribute to a strong detracting in scenic amenity from this scenic view designation." VP20 is a stop off point on the Wild Atlantic Way with ample parking, picnic benches, walking access to the estuary, and temporary coffee van in the summer season. It is an area well visited by tourists and locals, it is also frequented by workers as a stop-off point for break in their journeys. It is a much photographed view. The turbines would be highly visible in this view, dominating the valley and presenting considerable skylining and obliterating the EHSA area that lies in the upland hills directly behind them from this aspect. Rather than 'likely to catch the eye of the casual observer' the proposed turbines would present a substantial and significant intrusion on the landscape even for the most casual or uninterested observer.

There are many more instances of downplaying the effects of the views in the chapter. While they may be subjective it could be suggested that the area depends highly on tourism and tourists are coming to see the landscape and nature and would be highly sensitive to views of development on such a scale as the proposed windfarm with structures among the highest in the land. The local population having grown up and lived in the area for many years would be very sensitive to such changes in their environment and their peaceful scenic way of life would be severely altered, many homes along the northern bank of the Gweebarra river due to the orientation of the roads are sited with their windows and views across the valley in a direction directly towards the proposed development. The residents, visitors, holidaymakers and tourists would have no relief from these dominating rotating structures even as they sit within their homes at their kitchen tables or relaxing. For residents the turbines would continually catch their eyes every day all year round.

Contrary to the conclusion of Chapter 13 LVIA it could be considered that the proposed development would give rise to significant residual landscape effects, visual effects or cumulative effects.

The site lies in a 'not normally permissible' area for wind development, it also has a Moderate Scenic Amenity designation that contains the site, which are described as areas with "the capacity to absorb additional development that is suitably located, sited and designed". It is immediately bounded by various EHSA and HSA designations and also has boundaries and lies in close proximity to many SPA's SAC's and other important sites. It should be considered that the proposed development containing 19 turbines with 200m tip height along with all of the associated infrastructure would be of such a scale that the site and its environs could not reasonably be expected to absorb it without significant effects.

Permission for this development should be refused.

2. Population and Human Health.

The EIA includes a chapter on Population and Human Health (Chapter 5). This concludes with the following statements: "The proposed project is not anticipated to have any significant effects on population, socio-economics, employment, tourism, land-use and health and safety." and "Following consideration of the residual effects as set out in Section 5.6, it is considered that the proposed project will not result in a significant negative effect on population and human health in the local and regional area."

Chapter 5.4.3.2. Operational Phase. Wind Turbine Health Effects. The first three chapters regarding Wind Turbine Health Effects, Sleep Disturbance and Infra Sound each conclude with the assertion that there will be no significant adverse effects. Any adverse effects or the potential for adverse effects should be regarded as unacceptable with regard to the local population given that the Gweebarra valley will be very much altered if the proposed development were to go ahead. Although the EIA disregards any non-peer reviewed literature, it also appears to be selective in the citations that it refers to thus exhibiting some degree of bias on the part of the study for the benefit of the application.

The chapter Residential Amenity concludes with: "Based on a combined consideration of the above factors in determining the potential impacts on residential amenity, it is considered that there will be a slight negative effect on residential amenity which will be short-term for the construction phase and long-term for the operational phase. For the small number of the nearest noise sensitive locations, as described in Chapter 12 (Noise and Vibration), the significance of the effect may be considered as moderate and variable in the worst-case noise conditions. (i.e. a particular wind speed, direction, absence of screening, etc. as described in Chapter 12 (Noise and Vibration)." A moderate significance on nearest noise sensitive locations as predicted by modelling could present as severe to local receptors when consideration is given to current conditions i.e., the absence of development and peoples sensitivity to a perceived major change in their surroundings.

It is not acceptable that the potential for adverse health effects on the local population particularly those within the Gweebarra valley and estuary are not given full consideration.

Regarding employment/economy chapter 5 of the EIA claims there is a potential for employment during all phases of the project and potential for increased spending within the area by workers. The benefit to the local economy would be much less than portrayed in the EIA as most of the people employed would most likely be from outside of the area and travel from outside the area bringing with them their needs on a day to day basis. During the operational phase windfarms provide very little local employment as they need little maintenance, and this work is normally carried out by specialists in this field who travel from outside the area of the windfarm. A possible reduction in employment in the tourism sector over the longer term is not discussed but is a very real possibility given the nature of tourism in this location. A decline in tourism and visitor numbers to the vicinity would lead to a decline in employment and investment over the longer term. This is not in keeping with the objectives of the CDP Chapter 9.2. It could be considered that the development may have a negative effect on the economy and employment in the area.

Tourism.

Donegal is a county that relies heavily on tourism. Many tourists and visitors to the county come to experience the isolation, the natural beauty of the county and the many protected areas, views and visitor attractions on offer.

The site of the proposed development lies within the Gweebarra valley often referred to as a hidden gem by visitors to the locality. A significant area of Glenveagh National Park lies within the valley. Glenveagh National Park attracted 211,000 visitors in 2017 according to Failte Ireland, this figure may be much higher due to the number of visitors who embark on walking and other visits from points other than the main entrance and car park. Donegal CDP states:

“6.6 Glenveagh National Park: Zone of Visual Influence

Definition:-

The environmental and visual character of Glenveagh National Park consists of the geographic extent of the park and its immediate environs. The implementation of the relevant policy should not be interpreted as relating to lands with limited physical or visual connection to the park.”

As the site lies within the zone of visual influence then it directly negatively affects the visitor experience to one of the most visited attractions in the country. The site also lies adjacent to and in close proximity to a number of areas designated as EHSA, HSA, MSA, SAC's and SPA's, Natura 2000 sites, Nature Reserves, Natural Heritage Areas, Proposed Natural Heritage Areas and RAMSAR sites. These are detailed in the planning documents although the RAMSAR sites seem to be omitted. There are four RAMSAR sites in County Donegal, two of these, Lough Barra Bog and Meenachullion Bog, lie within the Gweebarra valley. These natural areas attract many visitors engaging in various activities including birdwatching, walking etc. The Gweebarra river is a pristine Atlantic salmon river attracting anglers from all over the world.

Glebe House and Gallery also nearby had 40,000 visitors last year according to latest OPW figures. The house and gardens aim to promote culture and heritage and have been developing the gardens and pathways for a more holistic experience. The proposed development detracts from such a vision and is not in keeping with the overall expectations to visitors to the area.

Visitor numbers to these types of natural areas have the potential to be adversely affected by the presence of a windfarm consisting of 19 structures which are among the tallest in the country and their effect on the experience.

The Wild Atlantic Way initiative offers great potential for tourism. Significant portions of the route along the N56 between Glenties and Dungloe would be impacted by the presence of turbines skylining above surrounding hills thus detracting from the visitor experience.

Tourism is a major resource in the immediate area and there are many local small businesses providing accommodation as B&B, AIRBNB etc. within the Gweebarra valley and estuary. There are also many holiday homes which bring visitors to the area. There is a risk that these businesses will be adversely affected by such a development due to a decline in visitor numbers.

Tourism in Donegal because of the above natural heritage amenities is promoted by many other bodies and websites. This area relies heavily on tourists and visitors and tourism should be developed in the area by protecting and promoting our natural assets.

The proposed development would have the potential to negatively impact on these assets and hence on the tourism of this area and is contrary to the policies and objectives of the CDP as stated in chapter 9.2 TOU-P-1, TOU-P-5, TOU-P-6, and TOU-P-9 and chapter 9.3.

Biodiversity.

Chapter 6 of the EIA deals with biodiversity. Figure 6-3 – shows a map of the boundary of the local area used for the evaluations and assessments. The boundary is shown as being along the centre of the Gweebarra river on the north-west of the site from Lettermacaward to Doochary. It could be argued that the river and estuary do not delineate a boundary for flora and fauna and that the boundary on the north-west should have been extended to beyond the western bank of the river. The study area has been unnecessarily curtailed by using a boundary that is also a part of the proposed site boundary along this edge.

There are many species present in the Gweebarra valley and estuary that are protected. Among the species observed close to the site are Common Frog, Common Lizard, various Bat species, Otter, Seal, Atlantic Salmon, Sea Trout, Brown Trout, Eel, Badger, Hedgehog, Irish Hare, Pine Marten, Pygmy Shrew, Red Deer, Red Squirrel, Bat and Freshwater Pearl Mussel. This is not an exhaustive list and merely includes examples of some of the species personally observed close to the site. The area has a rich and diverse variety of plant and insect species also requiring much more than a few days of surveys.

The developer estimates the following stone and fill material requirements:

- Internal Access Tracks – 40,000m³ of which 34,000m³ will come from onsite borrow pits;
- Substation and Construction Compounds – 28,000m³ of which 24,000m³ will come from onsite borrow pits;
- Turbine Foundations – 20,200m³ from external source; and
- Turbine Hardstand, Blade set-down area and vehicle turning area – 144,700m³ of which 120,000m³ will come from onsite borrow pits

And also somewhere between 10,500 – 19,000m³ of concrete for the turbine bases

The scale and nature of this development is such that there is great potential for much of the flora and fauna present to be adversely affected, there is also great potential for habitats to be impacted by altered hydrology due to the construction of roads and drains, quarrying, enormous volumes of concrete for hardstands, traffic etc. The effects of suspended solids carried by watercourses has the potential to affect the Gweebarra SAC and the West of Ardara/Maas Road SAC. Mitigation measures are unlikely to be sufficient to prevent negative effects to these SAC's, EPA projections for the future indicate a substantial increase in the frequency of heavy precipitation events in Winter and Autumn (approx. 20%).

The application should be refused for this reason.

Ornithology.

Chapter 7 of the EIA deals with ornithology. Figure 7-5 – shows a map of the boundary of the local area used for the evaluations and assessments. The boundary is shown as being along the centre of the Gweebarra river on the north-west of the site from Lettermacaward to Doochary. It could be argued that the river and estuary do not delineate a boundary for bird species and that the boundary on the north-west should have been extended to beyond the western bank of the river. The study area has been unnecessarily curtailed by using a boundary that is also a part of the proposed site boundary along this edge.

There are many species of bird present in the Gweebarra valley many of them protected. A non-exhaustive list personally witnessed within 2km of the site includes Golden Eagle, Merlin, Peregrine Falcon, Sparrowhawk, Buzzard, Cormorant, Hooper Swan, Mute Swan, Cuckoo, many species of Gull, Blackbird, Bat, Bullfinch, Carrion Crow, Rook, Raven, Chaffinch, Coal Tit, Great Tit, Blue Tit, Collared Dove, Woodpigeon, Curlew, House Sparrow, Kingfisher, Magpie, Mallard, Song Thrush, Mistle Thrush, Pheasant, Red Grouse, Swallow, Starling, Wren, Pied Wagtail, Yellow Wagtail, Snipe.

Many of these species can be viewed in and around and above the proposed windfarm site, many others can be seen traversing the site. A few days survey should not be considered sufficient to fully assess the area.

The scale and nature of this development is such that there is great potential for adverse effects on the bird populations in the area and the development should be refused permission on this basis.

Conclusion.

The planning application justifies the development on this site as it is already an area with altered land use, i.e. forestry plantation. In the times since this forestry was allowed there has been much learned and changes in policy in recognition of the need to conserve the environment. Therefore, the historical permission of environmentally unsound forestry plantation in this area should not be compounded going forward with the additional burden of a 19 turbine windfarm, comprising some of the tallest structures in the country on the site and the additional stresses that it would have on the local people and environment. It would be much better for the forestry to come to its commercial end and be allowed to regenerate naturally fully returning the Gweebarra valley to one of the jewels on the Irish landscape.

It has been shown that contrary to the claims on the planning application that the site is not able to absorb the addition of this development due to the scale and interference with its surrounding environment. It will tower over the surrounding trees (on average 15m tall according to EIA), and tip height is higher than surrounding hills, the height will be exaggerated due to the elevation of the turbine bases when compared to surrounding residences and roads. The existing measuring mast at 100m is

clearly seen skylining from much of the surrounding area, the effect of turbine with tip height double of that and also placed at higher elevations will be significantly worse.

There is great potential for this development to present negative impacts on many aspects of the locality including tourism and the economic benefits from it, deterioration of the local environment and its flora and fauna, and the quality of life and enjoyment of their property for the local population.

The application is in material contravention to the Donegal County Council CDP which is prepared for the benefit of people of the county with their input and the hard work and contributions of the elected representatives of the county.

We ask that permission for this development be refused.

Yours faithfully,

William and Kim Cunningham.