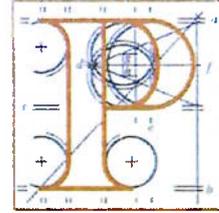


Our Case Number: ABP-318701-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Ceide Coast Community Company
Eco Campus
Main Street
Ballycastle
Co. Mayo
F26W544

Date: 26 February 2024

Re: 10 year planning permission for the proposed wind energy development consisting of 22 wind turbines and all associated infrastructure located in the townlands of Glenora, Altderg, Keerglen, Ballykinlettragh, Ballycastle, Ballyglass, Killeena, Glencullin and Lugnalettin, Co. Mayo. (www.glenorawfplanning.com)

Dear Sir / 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. Please accept this letter as a receipt for the fee of €50 that you have paid.

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 the local authority 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.

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,



Lauren Murphy
Executive Officer
Direct Line: 01-8737275

PA04

Teil	Tel	(01) 858 8100
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



Céide Coast Community Company Ltd,
Eco Campus,
Main Street,
Ballycastle F26 W544
Co. Mayo

19 February 2024

To: An Bord Pleanála

Re: An Bord Pleanála Planning Ref PA16.318701 Glenora Windfarm, Ballycastle, Co Mayo.

From: Ceide Coast Community Company Eco Campus, Main St, Ballycastle, Co Mayo. F26 W544.

Description: 10 year planning permission for the proposed wind energy development consisting of 22 wind turbines and all associated infrastructure.

To whom it concerns at An Bord Pleanála,

We The Ceide Coast Community refer to the above planning application and wish to make the following observations in relation to the proposed development.

Regards,

A handwritten signature in black ink that reads 'Maura Fox'. The signature is written over a horizontal line.

Maura Fox
Company Secretary

On behalf of the Ceide Coast Community CLG

Registered in Ireland: Céide Coast Community Company Limited by Guarantee

Registered in Ireland No: 616734

Registered Charity No: CHY 22662

Charities Regulatory No: 20205880

The Ceide Coast Community Coast (CCCC) was established approximately six years ago in response to the issues that are affecting the local area such as rural decline, depopulation, closure of schools (primary and post-primary) and post offices in the parish of Ballycastle/Belderrig and surrounding areas. In this instance, and to reverse such decline, the aims and objectives of the CCCC are to sustain and improve the tourist potential of the area and in doing so, via a knock-on affect, improve the economic factor, aesthetic appearance and sustainable well-being of the locality.

The CCCC catchment area has lasted through and protected a culture and heritage dating back over 6000 years ago which is celebrated and interpreted at the local Ceide Fields Interpretative Centre hosting over 30,000 visitors to the area annually. The CCCC was successful in 2021 in attracting the world-renowned Red Bull Cliff diving event to Downpatrick Head. The scenic views and historical significance of the site and surrounding area were a major factor in securing the event not alone for Ballycastle but the whole of County Mayo. Given the enormous success of the event and the viewership figures it brought to North Mayo from both National and International press (in the millions) the CCCC understand that Downpatrick Head will at some point host the event again in the future. This will have significant economic boosts for the both the North Mayo and County areas.

While we are not vehemently opposed to renewable energy projects in our area, we do wish to make a number of observations on the proposed Glenora project and the affects it would or may have on our area, our home.

The Ceide Coast Community Company (CCCC) wish to make the following observations regarding the proposed Glenora Windfarm:

Effect on the Visual, Scenic Amenity and Tourism Value of the Area.

The inclusion of Downpatrick Head , Ballycastle (within sight of the proposed project) as a signature point on The Wild Atlantic Way has been a huge success for the area in attracting over 50,000 visitors annually. It's stunning natural scenery and rare geological features have drawn recognition from visitors around the world who have come here in their droves to view this stunning area of high scenic value. Standing at Downpatrick Head the visitor gets to see a full 360-degree panoramic vista which not just includes the sea-views and the Slieve League Cliffs in Co. Donegal but also the surrounding hills which form an essential part of the local heritage. Those hills form part of the Ceide Fields neolithic complex stretching from the Ceide Fields Interpretive Centre right over to the Ballinglen Hills and onto and including Lacken Hill. On those hilltops preserved underneath the peat are the Ceide Field farming wall systems which are 6000 years old (older than the pyramids in Egypt). This neolithic landscape combined with the stunning sea and cliff views provides the viewer with one of the best visitor experiences along the Atlantic Way. The CCCC consider that the approval of 180m high wind

turbines on this neolithic landscape is totally out of character with its natural surroundings and would have a very negative impact on the scenic amenity of the area. It also contradicts and severely undermines the whole concept of the Wild Atlantic Way feature points and what we are trying to promote at such stunning scenic vistas within the county.

The CCCC are at an advanced stage in the planning process with regard to the construction of a 15km coastal walk stretching from Downpatrick to Ceide itself. Indeed a Part 8 Planning Application has been launched and is currently live. This stunning walking trail will provide a unique opportunity for the walking enthusiast to trek along the stunning coastline between two significant culturally and historically renowned sites overlooked by our neolithic landscape (Ceide Fields and Downpatrick Head). The CCCC committed to this project a number of years ago and firmly believe that the visitor experience of this area will be greatly enhanced once this walk is in place. It is for the above reasons that CCCC feel that this windfarm project should not go ahead as the inclusion of wind turbines on the landscape is out of character and negatively impacts on the visual and scenic amenity. We consider that this development does not support our vision for this area and will have a significant and long term - adverse impact on the local community, heritage and environment.

The CCCC are aware of a number of other additional windfarm proposals within the catchment area. We consider that the cumulative and in-combination effect on the landscape from this windfarm and other similar projects is not sustainable and will have a further extremely negative long-term adverse impact on the integrity of the visual landscape in an area of pristine, natural beauty and unique international heritage value.

The Ceide Coast and its hinterland contains some of the oldest field systems in the world and they are confirmed to be present and widespread all across the hills within this area of North Mayo. This archaeology is unique to the Ceide Fields complex and the CCCC consider that no development should be allowed on these sites or in the proximity of such sites where this archaeology exists. The character of the area should be preserved as it has been by the people of the area for the last 6000 years.

The proposed project will have an adverse impact on tourism in the Ballycastle, Belderig, Kilfian, Lacken and other local areas during both the construction and operational phases of the proposed project. Tourism is an important year-round industry to the local area as along with farming it makes up the majority of employment opportunities. Tourism offerings being negatively affected will be detrimental to the area and along with the aforementioned Downpatrick Head Signature Point, the Ceide Fields Neolithic site, there are others that will be impacted in a negative way such as;

The Western Way Trail

The Western Way Walking trail from Oughterard in Co. Galway to Ballycastle, Co. Mayo and beyond to Bunnyconellan was established in the 1980s and will be impacted negatively and for a long period of time during the construction of this project. It is currently signposted as "Closed" through the area in which the project will be imposed and as such has removed it as an amenity to this area and beyond. An announcement by Michael Ring T.D. welcoming a spend of 180,000 euro a number of years ago on the development of a walking and cycling trail enhancement of the Western Way on the section from Bellacorrick to Ballycastle never materialised, nor did the added positive benefits of greater tourism numbers or physical and mental health accrue either. The complete removal of this tourism and recreational resource from the local and regional area is detrimental. Even if it is re-opened in a number of years once the turbine field has been established, the vistas will be utterly changed to that of a walk through once natural and semi-natural peatland and woodland to that of a commercial establishment. A large portion of the Western Way Walk will be taken up as a Haul and access route for the construction of the proposed project.

The Shralogga Loop Walk

A major section of the existing Shralogga Loop Walk from Ballycastle through Ballyglass, Ballyknock and returning to Ballycastle Village again will be negatively impacted by the development of this project. The proposed haul route utilises a section of the walk and with the carriage of heavy goods and infrastructure to the site will create a negative affect and a safety concern for walkers who used the walk on a regular basis.

The huge blades and turbines will be visible throughout the area and whilst renewable energy is a positive in some circumstances; the development of such imposing infrastructure as previously stated – an area of high scenic value – will be damaging to the potential for further Tourism in this unspoilt, natural and long established indigenous cultural area of Ireland.

A Total contradiction to current Planning Policy in the Area to date

Ballycastle and surrounding areas have been subject to an extremely restrictive planning approach by both local and national policy over a number of years. The designation of areas of Co. Mayo as suitable for wind energy by the Local Authority also a number of years ago in their document "Renewable Energy Strategy for Co. Mayo 2011 to 2020" albeit a positive attempt at bringing forward renewable energy in Ireland did not serve the population of rural residents of the county very well as there was not enough consultation on the proposal and the likely issues involved where commercial interests outweighed local needs.

Allowing a grant of planning through SID by An Bord Pleanála for twenty two 180-meter wind turbines in the Ballycastle area while simultaneously and consistently refusing planning permission for local residents – on primarily Visual and Scenic Amenity grounds- to build family homes in this area is a clear manifestation of unfairness and injustice. A decision to allow not only disregards the rights and needs of the local community but also demonstrates a concerning prioritisation of commercial interests over the well-being of residents and the preservation of natural beauty.

Firstly, the construction of such massive wind turbines in an area known for its great natural beauty raises serious concerns about environmental impact and landscape degradation. Ballycastle, like many other rural areas, relies heavily on its natural charm to attract tourists and provide locals with a high quality of life. Allowing the installation of towering wind turbines significantly alters the landscape, potentially damaging the visual appeal and natural habitat of the area. This decision overlooks the importance of preserving such landscapes for future generations and undermines the efforts of both the Mayo County Council and the local community groups, NGOs etc in the protection and care-taking of the Ballycastle and surrounding areas to date.

Secondly, the inconsistency in granting planning permission reveals a blatant disregard for the needs of the local community. While large-scale commercial projects can be approved without hesitation, local residents are faced with endless hurdles and rejections when seeking permission to build family homes. This discrepancy not only denies individuals the basic right to housing but also perpetuates inequalities within the community. Families are forced to navigate bureaucratic obstacles and endure lengthy delays, mainly resulting in frustration, financial strain and the denudation of this area of North Mayo of its people- primarily the young. Depopulation is ongoing and Ballycastle has been elevated to a more severely deprived area by POBAL in recent weeks.

Moreover, the decision to prioritise wind turbines over residential development reflects a skewed set of priorities that prioritises profit over people. The potential economic benefits of wind energy should not come at the expense of the well-being and livelihoods of local residents. It is unjust to sacrifice the needs of the community for the sake of corporate interests, especially when viable alternatives exist.

Should the project obtain planning permission for the proposed development, then a completely new approach to planning policy for local housing development in the area **MUST** be brought into being. The argument of “a negative impact on the scenic value and amenity of the area...” argument will not be acceptable.

Why is this wind farm project proposed in uplands around the village of Ballycastle Co. Mayo where energy requirements are miniscule and not in the uplands around the city of Dublin where energy needs are enormous?

The city of Dublin, as the primary urban centre in Ireland with a large population and diverse industries including a number of large Data Centres, has significantly higher energy demands compared to the rural village of Ballycastle. Constructing the wind farm in the uplands around Dublin would ensure that renewable energy production is strategically located to meet these substantial energy needs. While every community benefits from renewable energy initiatives, the energy demands of Ballycastle are tiny when compared to urban centres like Dublin. Allocating resources to meet the energy needs of Dublin would have a far greater impact in terms of reducing carbon emissions and transitioning towards sustainable energy sources.

Grid Integration and efficiency by building the wind farm in the uplands around Dublin City would allow for more efficient integration with the existing energy grid. This would minimize transmission losses and infrastructure costs associated with transporting electricity over long distances, ultimately maximizing the efficiency of renewable energy generation. By siting the wind farm near Dublin, renewable energy resources would be utilized more effectively to meet the demands of a densely populated area. This ensures that investments in renewable energy infrastructure yield maximum benefits in terms of reducing fossil fuel dependence and mitigating climate change.

The economic consideration of developing the wind farm in the uplands around Dublin would create significant economic opportunities, including job creation, investment, and local economic growth. These benefits extend beyond the construction phase, providing ongoing employment in maintenance, operations, and associated industries. This disparity in economic impact underscores the importance of prioritizing locations that offer the highest return on investment and socioeconomic benefits.

Locating the proposed development in close proximity to the area of greatest energy demand on the island of Ireland would also have a mutual benefit in allowing protection of regionally sensitive environments in Co. Mayo. The upland blanket bogs around Ballycastle possess unique ecological characteristics and sensitive habitats that warrant protection. Building the wind farm in such areas could lead to habitat fragmentation, disturbance to wildlife, and degradation of natural landscapes again in an area where this energy demand is negligible. Prioritizing the construction of wind farms in areas with lower environmental sensitivity, such as uplands near Dublin, allows for a more balanced approach to renewable energy development. It minimizes the conflict between conservation objectives and energy production goals, ensuring responsible stewardship of natural resources.

In conclusion, while Ballycastle may benefit from renewable energy initiatives, the greater impact and efficiency of constructing the wind farm in the uplands around Dublin cannot be ignored. By prioritizing locations with higher energy demands, closer proximity to demand

centres, and lower environmental sensitivity, we can maximize the socioeconomic benefits of renewable energy projects while minimizing negative impacts on local communities and ecosystems.

There is currently only one wind turbine of any significant power output capability within a 15 km radius of Dublin City, located near the village of Manowar, Fingal, north Co. Dublin. This needs to change.

Community Benefit Fund

A Community Benefit Fund will only become applicable and active from the project once it becomes operational and supplying power to the National Grid – Should a Renewable Electricity Support Scheme RESS contract not be obtained (or no Grid connection be available) and where power from the development is used to generate, Green Hydrogen for example, then there will not be a Community Benefit Fund obligation. What are the proposals from the Applicant, Glenora Wind Farm DAC, in such a situation?

As discussions surrounding the allocation of the Community Benefit Fund from the Glenora Windfarm project unfold, it becomes increasingly evident that a substantial portion, at least 70%, should be directed towards the betterment and development of the Ballycastle-Belderrig parish area and immediate surrounding areas. This observation stems from several key factors that underscore the importance of prioritizing these communities in the utilization of such funds.

First and foremost, these areas stand as the immediate host communities for the Glenora Windfarm project. As such, they bear the brunt of the project's impacts, ranging from visual changes to potential disruptions in daily life due to construction and operation activities. Redirecting a significant portion of the Community Benefit Fund back into these communities represents a form of compensation, acknowledging their role in supporting renewable energy initiatives while simultaneously addressing any adverse effects experienced by residents.

Moreover, focusing on the Ballycastle-Belderrig parish area where the project is primarily to be sited areas aligns with the principles of social equity and environmental justice. The next allocation of funding should be to the parishes of the surrounding areas, namely Kilfian, Lacken, Moygownagh. These communities face unique challenges, including economic disparities, limited access to resources, and insufficient infrastructure. By earmarking funds for their development and improvement, stakeholders can contribute to levelling the playing field and fostering more equitable outcomes for all residents.

Furthermore, investing in local development initiatives has the potential to create positive ripple effects throughout the broader North Mayo region. Strengthening community infrastructure, supporting small businesses, and enhancing educational and recreational

opportunities not only could improve residents' quality of life but also contribute to the overall economic vitality and resilience of the area which is in a degraded economic state currently.

Additionally, directing a significant portion of the Community Benefit Fund towards local projects ensures that residents have a direct stake and voice in shaping their community's future. Through participatory decision-making processes, community members can prioritize initiatives that reflect their needs, values, and aspirations, fostering a sense of ownership and empowerment that transcends the lifespan of the wind farm project itself.

In conclusion, allocating at least 70% of the Community Benefit Fund from the Glenora Windfarm project to the Ballycastle-Belderrig parish area, a pro-rata amount to Kilfian parish areas is not only fair but also strategic and socially responsible. By investing in these communities, stakeholders can address immediate concerns, promote social equity, stimulate economic development, and empower residents to actively participate in shaping their own destinies. This approach can not only maximise the positive impacts of the proposed renewable energy project but also serves as a model for sustainable and inclusive development practices. It must be ring fenced to at least 70% for Ballycastle projects if planning permission is granted and if not under a RESS contract then a bespoke Community Benefit Fund must be created in its place.

Ornithology:

The Annex I listed Whooper Swan (*Cygnus cygnus*) is Amber listed. This species has been witnessed by locals in the Glenora area on numerous occasions and is a well-known migrant visitor to the Ballycastle and Glenora hinterland where it can be seen flying to and from Lough Conn between the months of October and April. This Whooper Swan flight transit is a route corridor for foraging to and from these locations. The proposed wind farm at Glenora is directly within the flight path of Whooper Swans arriving from the northern regions in October and flying back north in April to Iceland and Northern Europe. Given the location of Lough Conn and the proposed Glenora Wind project, it is clear to deduce that the construction of these significant turbine numbers as described in the MWP report will have an adverse 'barrier-like' impact on the Whooper Swan species with a real danger of turbine collision. In addition, the proposed project at Sheskin and the presence of numerous turbines at Oweninny, Bellacorick will result in a severe reduction in the availability of certain route corridors for the Amber listed species which in essence will result in death and extinction for Whooper Swans utilising this area.

There are other species using this corridor as witnessed by locals frequently such as Grey Heron. Grouse and Snipe are also numerous in the proposed area. Additionally, there are numerous smaller lakes in the adjacent areas of Glenora, Shralogga, Altdearg, Clydagh,

Shrameen, Aghoose, Sheskin, Inagh, Ummerantarry and Oweninny that are in essence interconnected freshwater areas that provide perfect resting habitats for not alone Whooper Swans but a number of other species.

It is the opinion of the CCCC that any such development as described will have a detrimental and adverse impact on Whooper Swan species amongst others.

Flooding Issues Downstream

The location for the proposed wind farm at *Glenora comprises pristine blanket bog that has the capacity to store large volumes of rainwater that falls at these locations on a regular basis during the winter-time and indeed with the current climate change effect, the summer.*

These precipitation events are becoming more and more unpredictable, more frequent and more intense. At present there is regular winter flooding of the lower flood plain below the proposed Glenora project at Milltown, Ballycastle to the point where the adjacent Ballycastle to Belmullet road is constantly posing a danger to motorists. The same can be said for dwelling houses adjacent to the old mill further upstream. Agricultural lands to the north of 'Tomas' bridge and to the south are constantly flooding. Not alone will this result in a health and safety and insurance issue for the people of Ballycastle, but it will also lead to a depreciation effect in the value of such lands and indeed nearby property.

Flooding and Water Quality Issues for the Ballinglen River & Ballycastle Beach

Downstream of the 'Tomas' Bridge area the water quality is categorised as 'Poor' at the RS33B010210 EPA River Quality Monitoring station. This is due to the fact that when there is a flooding issue at the nearby Urban Wastewater Treatment Plant (as a result of major rainfall events upstream at the Glenora and Aghoose catchment basins) the treatment system malfunctions emitting toxic polluted water to the Ballinglen River. More often than not the result is that Ballycastle beach has to close due to the health and safety issues of harmful toxins in the water from waste.

In relation to the proposed development at Glenora, it is the opinion of the CCCC that the removal of pristine blanket bog from the Glenora hydrological catchment area coupled with the fragmentation of the area to accommodate the placement of a multitude of turbines will result in the lack of water retention capacity at this location. This will lead to the rapid movement of river waters downstream with a significant adverse effect on human receptors downstream in the areas as described previous. There will be increased pollution of the Ballycastle Beach area and its waters with the increased potential for further eutrophication of the Ballinglen River, fishkills or worse still the death of the river habitat and associated ecology.

There have been several peat slides in the past in this area where there are high slopes involved at the upper edges of river catchments. One such peat slide occurred at Behy just outside the village of Ballycastle where the bog became loose as a result of afforestation practices. The result was thousands of tonnes of material slid down slope, across the main Ballycastle to Belmullet road and into the adjacent Atlantic Ocean. A similar incident in Glenora would result in the pollution of both the Glencullin AND Balinglen rivers , further flooding issues for human receptors downstream and serious adverse implications for fish, mammals and the riparian corridors that would be involved.

Increased Acidification and Sediment Loading of Rivers

It cannot be guaranteed that there will not be water quality problems arising from the construction of the Glenora project as proposed relating to the release of sediment and hydrocarbons to the aquatic environment from the use and movement of machinery used in its wind farm construction and potential impacts from acidification as a result of forestry removal and pine needles entering the Glencullin and Balinglen Rivers.

Traffic Impact

The impending construction of the Glenora Wind Farm project, particularly the installation of towering 180-metre high turbine structures, raises significant concerns regarding the probable disruption to the Ballycastle rural area caused by heavy commercial traffic. This observation stems from an understanding of the logistical challenges and potential impacts associated with transporting large components and equipment to the project site, as well as the broader implications for local infrastructure, environment, and community well-being.

Firstly, the transportation of components for the wind turbines, such as blades, towers, and nacelles, requires specialized heavy goods vehicles (HGVs) and oversized loads, which are often accompanied by escort vehicles for safety reasons. The influx of such large and heavy commercial traffic into the Ballycastle rural area poses several immediate challenges, including increased congestion on local roads, potential damage to road surfaces and bridges, and heightened safety risks for motorists and pedestrians.

Moreover, the construction phase of the Glenora Wind Farm project is likely to necessitate a significant increase in vehicular movements, with HGVs traversing narrow rural roads and navigating challenging terrain to reach the designated construction sites. This influx of heavy commercial traffic not only disrupts the tranquillity and rural character of the area but also poses a potential threat to the safety of residents, particularly those living along transportation routes.

Furthermore, the environmental impact of heavy commercial traffic cannot be overlooked, as diesel emissions from HGVs contribute to air pollution and greenhouse gas emissions, exacerbating climate change and compromising local air quality. The construction phase may also result in habitat disruption, soil erosion, and noise pollution, further degrading the natural environment and wildlife habitats in the Ballycastle rural area.

Additionally, the increased presence of heavy commercial traffic during the construction of the Glenora Wind Farm project has the potential to strain local infrastructure and services, including emergency response capabilities, healthcare facilities, and waste management systems. This strain may lead to delays in emergency response times, inadequate provision of services, and additional pressure on already stretched resources, diminishing the overall quality of life for residents.

In conclusion, the probable disruption to the Ballycastle rural area by heavy commercial traffic associated with the construction of the Glenora Wind Farm project, particularly the installation of 180-metre high turbine structures, underscores the need for careful planning, mitigation measures, and community engagement to address concerns and minimize negative impacts. Stakeholders must work collaboratively to ensure that the construction phase proceeds in a manner that prioritizes the safety, well-being, and environmental sustainability of the local community.

What really are the long term benefits from the proposed Wind Farm for Ballycastle and the surrounding areas of North Mayo?

Wind Farm construction is a specialised activity with select contractors travelling from project to project. The promise of a number of local jobs is greatly overstated. The operational phase of the 22 turbines will have a bare minimum of again specialised personnel involved in technical operation and occasional maintenance of the turbines and associated infrastructure. Therefore any statement regarding the economic benefit in the creation of employment is disingenuous. There are no visible positive benefits for the siting of this project in the Ballycastle area other than a negative visual impact on the scenic beauty.

Conflict of Interest between Blanket Bog Restoration and the Development of Wind Energy Infrastructure on Blanket Bog

The proposed Glenora wind energy development and the accompanying grid connection which will run through the village of Ballycastle will require the movement and operation of multiple sets of large-scale machinery across a wide area. Ground and surface material such as rocks, gravel and maintenance will need to be imported into the site from exterior areas in order to lay foundations for turbine bases and access routes in relation to the haulage of the

turbines as described including large volumes of other materials. The imposition of such materials (not to mention the concern around biosecurity measures and management protocols) been placed upon pristine blanket bog is surely contradictory to the policies of national authorities and organisations such as the Department of the Environment, Climate and Communications, Bord na Mona, the Nature Trust and Coillte (who have been planting and harvesting large volumes of forestry in the area at will with no input back into the local community whatsoever).

Atlantic blanket bog is an important habitat for many species of plants such as Bog asphodel, Heathers, Tormentil, *the rare Marsh saxifrage*, Cranberry and a multitude of Sphagnum mosses, insects, amphibians, birds and mammals, including protected species such as Golden plover, Whooper Swan and the Marsh Fritillary butterfly.

The majority of Ireland's blanket bogs such as the one at Glenora are in poor condition due to a range of human activities. The Irish government's Climate Action Plan 2023 (CAP 23) recognises that restoring peatlands will deliver a range of climate benefits through reduced carbon emissions, long-term carbon storage and enhanced resilience to the impacts of climate change. The plan is the first to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021, and following the introduction, in 2022, of economy-wide carbon budgets and sectoral emissions ceilings. Bord na Mona are restoring 8000 hectares of bogs to their natural state which will help to absorb carbon from the atmosphere. In their methodologies for carrying out restorative works Bord na Mona are blocking drains in order to rewet bogs returning them to their former state of peat-forming conditions. As stated already, this will assist in the prevention of further carbon dioxide release into the atmosphere. As described, the imposition of placing a wind energy development of this scale at Glenora with numerous digging and fragmentation practices being placed upon the bog at Glenora will not adhere to the previous policies as described above.

With all of these national stakeholders aims, objectives, targets and policies in mind it is highly questionable whether the imposition of a wind energy development on the scale of Glenora comprising of 22 turbines is in adherence to this. It is more in contradiction to these national stakeholder and bodies targets than in adherence in the opinion of the CCCC.