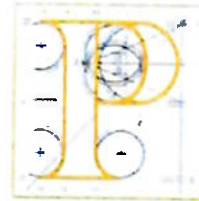


**Our Case Number:** ABP-318816-24



**An  
Bord  
Pleanála**

Una Watkins  
Garrysallagh Glebe  
Rath  
Co. Offaly

**Date:** 04 March 2024

**Re:** 10 year planning permission for wind energy development consisting of 8 no. wind turbines and all associated works located at Cush, Galros West, Boolinarig Big, Eglish, and Ballindown, Co. Offaly. ([www.cushwindfarmplanning.ie](http://www.cushwindfarmplanning.ie))

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](http://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,

Ellen Moss  
Administrative Assistant  
Direct Line: 01-8737285

PA04

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64 Marlborough Street  
Dublin 1  
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Garrysallagh Glebe,  
Rath,  
Co. Offaly

27th February 2024

An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

**Re: Objection to Application Reference Number: PA19.318816  
[Planning Application for a wind energy development and all associated works at Cush, Galros West, Boolinarig Big, Eglish, and Ballindown, County Offaly.]**

A Chara

I am writing in relation to the planning application submitted by Galetech Energy Services for a wind energy development and all associated works at Cush, Galros West, Boolinarig Big, Eglish, and Ballindown, County Offaly. To this end, I have paid the required fee of €50.

With regard to the nature of the receiving environment and the open nature of the immediately adjoining lands and the size and scale of the proposed turbines, and in consideration of the existing wind farm developments at Stonestown, Kilcamin, Crancreegh and Derrinlough, I strongly position that further development in the area would create an unnecessarily damaging visual intrusion of the landscape (by reason of the height and spatial extent of the proposed turbines) which would be excessively dominant and visually obtrusive when viewed from the surrounding countryside and villages. The proposed extension of wind energy development would seriously injure the visual amenities of the area, would be contrary to the provisions of the Wind Energy Guidelines for Planning Authorities issued by the Department of Environment, Heritage and Local Government in June, 2006 (as well as the Draft Revised Wind Energy Development Guidelines December 2019) and also contrary to the proper planning and sustainable development of the area.

Accordingly, I object in the strongest possible terms to the proposal to build 8 wind turbines (with hub height of 114 metres, a rotor diameter of 172 metres and an overall tip height of 200 metres) for the following reasons:

*1. Danger to local wildlife, natural habitats and of wild fauna and flora.*

Wind energy can have adverse environmental impacts, including the potential to reduce, fragment, or degrade habitat for wildlife, fish, and plants.

- a. Habitat:* The proposed windfarm is located near [REDACTED] a 55 hectare site comprising of an angling lake – Loch Clochan, several natural ponds and wetlands, open birch-willow woodland, grassland and naturally recolonising Scots Pine. Cloghan Wetland is a stunning location for a tranquil walk, with a 3.5km pathway taking you around the lake, along the wetlands and through the open birch-willow woodland. The proposed development will adversely impact visual vistas and tranquillity (due to noise) of the Cloghan Wetland area, disaffecting visitors (both local and tourists) from the area.
- b. Flying Wildlife:* Spinning turbine blades pose a threat to flying wildlife like birds and bats and most likely as a result, reduce the local bird population. Wind farms harm birds in three possible ways: disturbance, habitat loss (both direct and/or indirect) and collision. Given that the site of the proposed development is in close proximity to Special Protection Areas

(SPAs)<sup>1</sup> which are potentially within primary foraging range of species that are considered of conservation value, the risk to the European Golden Plover and Hen Harrier is particularly worrisome.

- i. The Applicant positions that the predicted mortality to the **European Golden Plover** will be *very high* (77.4 birds per year). This is unacceptable given that this species is red-listed according to Birds of Conservation Concern in Ireland 2020-2026 and is of 'high conservation value' as a result.
- ii. The fifth national survey of **Hen Harriers** in 2022 published by the National Parks and Wildlife Service has revealed shocking declines of Hen Harriers. The survey asserts that 85 confirmed pairs of Hen Harrier were recorded only, representing the most severe decline of any national survey to date. Whilst considered by the Applicant, the ecological assessment with respect to possible impact to this species is limited and lacks robustness, especially as survey of risk was carried out outside of the breeding season.

In addition to bird wildlife, there is significant risk to native butterfly species and bees.

- iii. The **Marsh Fritillary Euphydryas aurinia** is Ireland's only legally protected insect species. It is afforded protection The habitat of the [REDACTED] is currently protected within Special Areas of Conservation where it is listed as a Qualifying Interest. Evidence of these butterflies was seen in the locality in 2017<sup>2</sup> and recorded flying within the Project site in May 2021 (by the Applicant), but there is inadequate consideration of impact of the proposed development to the species (both in terms of impact to habitat and to potential for harm and fatalities from blades) from application assessment<sup>3</sup> with two dates 13-14 June 2022 surveyed only.
- c. **Land Wildlife:** The Eglish – Derrinlough area has an established population of [REDACTED] (with legal status: Wildlife Act, 1976; Wildlife Amendment Act, 2000; The Wildlife Order (Northern Ireland) 1985 as amended) which will be adversely affected by the wind farm construction and operation. Assessment of impact to the species, which has strong local interest, is inadequate and requires further assessment.
- d. **Aquatic Wildlife:** The **European eel** is critically endangered with red list status. The applicants own assessment posits that this 'species has a very poor conservation status and is found near the project and downstream of it also'. Despite this acknowledgment, the Applicant does not elaborate on the likelihood of what harm will come to the European eel, nor offers what is intended to mitigate any risks to same.

The risk to the afore species is contradictory to position of the Offaly County Development Plan 2021-2027, with specific reference to NHP-08 (*'it is Council policy to protect, conserve and enhance the county's biodiversity and natural heritage including wildlife (flora and fauna), habitats, landscapes and/or landscape features of importance to wildlife'*).

## 2. Natura Impact Statement Lacks Sufficient and Meaningful Consultation

- a. The scope for this assessment is asserted as being informed by consultation with statutory consultees and other bodies with environmental responsibility however of 18 statutory consultees and other bodies with environmental responsibility contacted, 14 did

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<sup>1</sup> Dovegrove Callows SPA (0 km from the Site), River Little Brosna Callows SPA (1.65 km from the Site) and All Saints Bog (2.23 km from the Site)

<sup>2</sup> <https://www.independent.ie/news/rare-marsh-fritillary-butterfly-rediscovered-on-irish-bog-after-20-years/35798455.html>

<sup>3</sup> <https://www.connaissancedesenergies.org/sites/default/files/pdf-actualites/csp2.366.pdf>

not engage / did not respond. There is no evidence of any effort to follow up or effort to prompt response from these bodies and accordingly independence of ecological risk is not ascertained and consultation disingenuous.

3. The vantage points for which assessments are based are inadequate.

- a. The geographic area impacted is large and diverse. There is no reference to landowners being approached in order to carry out more detailed assessments. Walking the terrain would have ascertained biodiversity behaviour/ nesting instances which would have been impossible to validate from drone surveillance. For example there are several derelict dwellings/out houses in the area which should have been assessed for ecological behaviour.

In conclusion, I whole heartily and strongly object to the proposed construction of wind turbines in Cush, Galros West, Boolinarig Big, Eglish, and Ballindown townlands for the above reasons.

Further attention needs to be given as to whether it is right to develop our peatlands in this way, given loss of carbon storage (and resulting) greenhouse gas release.

I appeal to the Board to consider this proposal in the overall context of Wind Farm development in Co. Offaly and the wider Midlands area, and refuse it outright.

Mise le meas,

Una Watkins