S. 37

File With _____

SECTION 131 FORM

Appeal NO:_PL 310789 **Defer Re O/H** ☐

TO:SEO

Having considered the contents of the submission dated/ received 31-01-23

from

BrigitteChristoph I recommend that section 131 of the Planning and Development Act, 2000 be/not be invoked at this stage for the following reason(s):. Not circulated Pending Review by Board Inspector

E.O.: Lisa Quinn **Date:** 8/2/23

To EO:_____

Section 131 not to be invoked at this stage. ☐

Section 131 to be invoked – allow 2/4 weeks for reply. ☐

S.E.O.:_____ **Date:**_____

S.A.O:_____ **Date:**_____

M _____

Please prepare BP _____ **- Section 131 notice enclosing a copy of the attached submission**

to: _____

Allow 2/3/4weeks – BP_____

EO: _____ **Date:** _____

AA: _____ **Date:** _____

S. 37

File With _____

CORRESPONDENCE FORM

Appeal No: PL 310789

M Carleton

Please treat correspondence received on 31-01-23 by e-mail **as follows:**

1. Update database with new agent for Applicant/Appellant _____	
2. Acknowledge with BP 20	**1. RETURN TO SENDER with BP** _____
3. Keep copy of Board's Letter ☐	2. Keep Envelope: ☐
	3. Keep Copy of Board's letter ☐

Amendments/Comments
Brigitte response to S.131 response.
Christoph's

4. Attach to file	**RETURN TO EO** ☑
(a) R/S ☐ (d) Screening ☐	
(b) GIS Processing ☐ (e) Inspectorate ☐	Lita / Lisa.
(c) Processing ☐	

	Plans Date Stamped ☐
	Date Stamped Filled in ☐
EO: Liz Clerke	**AA:** Cathy Carleton
Date: 01-02-23	**Date:** 03/2/23

Lisa. Lita

...sling Reilly

From:	Appeals2
Sent:	Tuesday 31 January 2023 16:44
To:	Lisa Quinn; Lita Clarke
Subject:	FW: submission Dr. Brigitte Christoph : Case Number ABP-310789-21
Attachments:	Brigitte Christoph submission ABP jan 23.pdf

From: Adventure Gently <adventuregently@hotmail.com>
Sent: Tuesday, January 31, 2023 12:17 PM
To: Appeals2 <appeals@pleanala.ie>; Lita Clarke <l.clarke@pleanala.ie>
Cc: 64hillside@gmail.com; Adventure Gently <adventuregently@hotmail.com>
Subject: submission Dr. Brigitte Christoph : Case Number ABP-310789-21

Please find attached Dr. Brigitte Christoph's submission in relation to ABP case number 310789-21.

Brigitte has asked me to send this via my email. Her email address is 64hillside@gmail.com I have copied her into this email.

Please could you confirm that you have received and can view this submission.

Kind regards

on behalf of Dr. Brigitte Christoph

Adrienne Diamond

Adrienne & Graham
ADVENTURE GENTLY
Guided Canoe Tours of North West Waterways, Ireland.
00353 (0) 851 821 547
http://adventuregentlyireland.com
http://facebook.com/AdventureGently

Dr. Brigitte Christoph,
Beagh,
Dromahair
Co Leitrim

The Secretary,

An Bord Pleanála,

64 Marlborough Street, Dublin 1

D01 V902

Case Number ABP-310789-21
Planning Authority Reference Number 20120

31st January 2023

Re: Construction of 8 Wind turbines, electrical substation, partial demolition and alteration of two agricultural buildings and all associated site development works. An Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement have been prepared. Bargowla, Boleymaguire, Braudphark, Derreens, Derrybofin, Derrycullinan, Derrycullinan Beg, Drummanacappul, Garvagh, Garvagh Glebe, Glassalt, Lisfuiltaghan, Seltan Sheena and Tinnybeg, County Leitrim.

Dear An Bord Pleanála,

This is my submission in relation to submitted information from MKO on behalf of the Applicant to the Board on 8th December, 2022.

Submission on peat stability

The assessment of the peat stability is done while forestry still covers most of the site. The felling of trees along access roads and on all infrastructure locations will result in the newly uncovered areas being exposed to heavy rainfall. The subsequent digging out of peat down to the rock at the foundation/hardstand locations and the perimeter berms and access tracks will result in trenches and basins where water can gather, seeping into the interface of peat and the underlying stratum and weakening the separated peat sections above. Furthermore, extraction of rock by means of rock breaking and blasting will be carried out at the borrow pit and certain turbine and hardstand locations. All these activities will have a knock-on effect on the peat stability.

In the northern half of the site, several "areas which have an elevated or higher construction risk (areas with deep, weak, and occasionally quaking peat; area with mechanically cut peat)" were recorded and marked clearly on Fig. 4-3 of EIAR Appendix 8-1; no construction works should be considered. Nevertheless, two turbines (T01 and T05), the northern repository and the substation are proposed within a few meters of them, with access roads running through two of them. A landslide has already occurred beside the weak area of T05 in2016.

The applicant's optimistic remark "that the long-term effects of climate change on rainfall patterns will not be observed during the lifetime of the proposed wind farm", though they mention Met Eireann's Regional Climate Model which projects an increase in the frequency of heavy precipitation events of approx. 20% (FIR to LCC Item No. 12), appears to me self-serving and incorrect.

Most landslides are preceded by heavy rainfall. The dugouts for the roads and infrastructure will disrupt the natural mechanical and hydrological continuity of the peat and reduce the lateral support for the peat layer. The construction of floating roads will put extra pressure on the peat blocks. The chances of shear failure are further enhanced by the weakening of the peat rock interface after heavy rainfall.

Considering the above, the board cannot be satisfied that the results of the peat stability risk assessments would be still valid during and after construction works, or that there is not the slightest doubt that no adverse effect on the ecology will stem from the activities on site. Even small bog slides can deliver big quantities of polluting peat particles to watercourses.

Submission on forestry felling

ABP has sought further information regarding the clear felling of forestry at the hillside siting of the northernmost repository. The only new information provided here is that the tree stumps are left inside the repository areas. The issue of clear felling, a hugely destructive environmental consequence in itself, is thus left completely unresolved and its additional impact on the environment of this proposed development is not assessed adequately or at all.

Submission on safe storage of peat and spoil

During the upgrade of existing roads, the construction of new ones, and the laying open of the perimeter berms, peat and spoil will be dug out. It is proposed "that peat and soft clay will be removed from below the footprint of the berms, temporarily stored locally, and eventually placed either in the repository or the borrow pit". The access road to the 1st repository is approximately 9 km long. No detail is given as to where the material dug up along the roads is going, where these temporary storage spaces are located and whether there is any risk of runoff into a nearby watercourse. It is proposed in Appendix III Process Flow Diagrams FIR to LCC, to "surround stockpiles with silt fences" and "weather off/seal stockpiles", but no further detail has been given. There is no further information to be gained by the supplementation of the 3D graphics in the applicant's response by Tantek4.

The developer proposes to surround the rivers with a self-imposed 50m buffer zone, however the repository areas and the borrow pit are nevertheless very close to this zone, and access roads are crossing these rivers in many places. Furthermore, numerous settlement pond/level spreader arrangements are situated within the 50m zone so it is likely that heavy rainfall will cause over spilling. The perimeter berms are intended to hold back the silt effectively; however, it is the case that peaty water will undoubtedly pass through the permeable berms as the stockpiling will cause the lower layers of peat to be pressed down by their own weight. While there is a low pH in these streams naturally, this further lowering will be fatal for invertebrate communities and other aquatic fauna. This is borne out in the first aquatic and fishery assessment of the development, Triturus (for MKO) concluded that "peat escapement and afforestation pressures from the upland Croagh catchment may be impacting the overall fisheries values of channels downstream" (NIS Appendix 4).

The comparison with the Garvagh Glebe Site nearby, where a significant failure took place in 2008, lists four points which purport to distinguish the Croagh site and that it "has a significantly less likelihood of a similar failure". The information provided is fundamentally flawed. " (1) Head of watercourses /natural drainage routes have been avoided" That statement is factually incorrect. A look at the drainage maps supplied by HES shows that the southern repository, the borrow pit and T10 are located at or very near to significant headwaters. Furthermore, the purported stated differences in peat thickness (6.3m vs. 6m) and undrained shear strength (see weakening factors above) are less than compelling and give no confidence that bog slippage and failure will not occur.

Conclusion

Considering all of the above, and that the tree felling will have to take place during the autumn and winter months when most of the rain is falling, together with the fact that three large bogflows/ bogslides occurred in 2020 alone after several years of only a handful of peat failures (Alan P Dykes in Landslides (2020) 19: 151-525) there cannot be absolute scientific certainty that no slippage or no acidification of streams will occur.

I ask the Board to overturn this planning decision by Leitrim County Council.

Kind Regards,

Dr. Brigitte Christoph

email: 64hillside@gmail.com

Report internal staff Ursula Corcoran. 28 May 21

Leitrim Co Co Planning report: Vivienne Egan Senior Executive planner. 21 Sept 2020

http://apps.leitrim.ie/idocswebDPSS/ViewFiles.aspx?docid=290295&format=jpeg

Re guidelines

In the event that the 2019 Draft Revised Wind Energy Guidelines (or very similar) are adopted prior to the submission of your response to this detailed request for additional information, please be advised that you will be requested to demonstrate how this application would comply, relative to the proposed operational noise limits given in the EIAR (Table 11-14 refers, Wind Turbine Criteria Curves)

FACTUAL REPORT

Table 3.1 Historical Peat Slide Events

Event Location	Date	Slide Length	Displaced Volume	Slope (°)	Contributing Factor(s)	Other Comment
Derrybrien, Co Galway	16/10/2003 29/10/2003	2,450m	450,000m³	<10°	Windfarm construction activity Zone of weak peat Natural drainage channel Heavy rainfall prior to 2nd movement	750m x 270m rupture Low permeability underlying rock
Pollatomish	19/09/2003	N/A	300,000m³	30°-60°	80mm rainfall in 2 hour period	11 no. distinct slippages

You would also be requested to demonstrate how this proposed wind farm would comply with the zero limit proposed with regard to shadow flicker as contained in the Draft Revised Wind Energy Guidelines.

Has the developer done this ???

Part of the site had never been check for archaelogical remains. We claimed the developer only did a desktop survey. Locals say there is a famine graveyard there.

Peat slippage

ref page 37 Shass Mountain peat landslide factual report RPS. landslide on 28th June 2020

7.3.1 Area A

A review of available information indicates that the 28th June landslide principally occurred within an un- forested area assessed to have > 2 m of peat. The slope angle is principally between 1 – 4° with zones having a slope angle over 4°. *Peat slope failure in Ireland* indicated that peat the majority of peat landslides occur on slopes of 4 – 8° with some in slopes of 1 – 4°. The zones with a slope angle over 4° appear to generally coincide with peat depths of less than 2m. Site contours indicate that the landslide is within the principal flow path for the slope and likely collected water from the wider slope.

Slope of repositories 2- 6, 2 - 8 and 2 - 12 degrees angle across entire slope

ref page. 6

no heading but after 2.2.2

Figure 2:1. Aerioal photo of material storage area at Lenalea wind farm

Lenalea Wind farm in Co Donegal ..... max tip height 135 x (7 or 9. turnbines).

is this example relevant as it is a smaller scale development?

Does displaced peat emit carbon?

Why are developers making borrow pits and peat repositories ? are they the same thing ?

Shass mountain report page 47

deposited peat will continue to degrade and emit high quantities of carbon into the atmosphere. This quantity of carbon released should be calculated and potentially offset elsewhere where possible.

Figure 2.6. 2.7.

How many trial pits ?

Are trial pits close enough to borrow pits and peat repositories

Are there enough of these trial pits to fully understand the land?

Will barrages be set up before work starts?