

From: [REDACTED] Personal information redacted
To: [PLANNING CPU](#)
Subject: Variation of Wind Energy Policy in 2018-2024 CDP
Date: Friday 3 June 2022 21:08:59

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Dear Sir,

On behalf of friends of the Graffy Environment Group (GEG) I write about the proposed policy changes Council are making to the County Development Plan with respect to wind turbines.

As we know all too well in this area wind farms are a divisive issue. Many of us would much prefer be involved in the many positive community endeavours every parish is proud of. It is more than apparent to us that wind farm applications have for far too long destroyed community spirit up and down the country.

We appreciate that Council is finally allowing the public to have a say on an issue that has had such a negative impact on our landscape. The gap in policy for the past three years has been hugely detrimental. It is particularly sorely felt in our area where the Graffy wind farm went through up to a half dozen applications with Council throughout 2021. Though, with respect, we note that its eventual refusal by Council marked somewhat of a turning point in assessing wind farm applications in recent years. Some major points of contention were addressed and the trite refusals of the preceding three years on the basis of a “lacunae in wind energy policy” was not the sole aspect of refusal. Sadly, the developer was not deterred – he appealed your decision to An Bord Pleanála. In his appeal to An Bord Pleanála he put a not too becoming focus on textual anomalies in the 2018 Plan around the principle of ‘augmentation’ which we note are addressed in this Variation.

Donegal has more turbines than most other counties and the time is surely here to call a halt to any new on shore wind farm developments. In recent years Donegal has arguably become the most popular visitor destination on the Wild Atlantic Way and that is a landscape reputation we should not blemish with further expansion of wind farm projects. Lonely Planet, British Royals, cruise ship visitors, Hollywood film crews, walkers and mountain trekkers all have Donegal on their wish list of somewhere to visit. Has anyone ever said they are coming to see our turbines?

GEG approve of the safeguards in the proposed variation and the balance struck by putting somewhat more emphasis on augmentation of actual existing but redundant wind farms. We note in the Variation text the Council's strong defence of the intention to reinsert a ten times tip height separation from homes. This can only lead to better protection for people having to endure living beside large industrial windfarms, and will help reduce secondary effects of wind induced noise, ill health or annoyance. We would add to that the fact that neither the Department (by advice) nor the Minister (by direction) challenged that provision when adopted by Council in back in 2018. Instead, it fell to a developer led Judicial Review attack on our Plan to delete ten times separation from the Plan. This was not defended by Council.

We draw your attention to Policy E-P-22 and ask Council to have particular regard to how it is implemented. All developers will of course state that they have, as E-P-22 requires, have "*meaningfully and properly consulted with the local community*" and "*demonstrated how the proposed development will be of enduring economic benefit*". In this the Council must also listen to the community. We have provided direct evidence to Council in the Graffy application of a solicitor's agreement drawn up between the company and a landowner offering a €10,000 per annum for twenty-five years to accept the "nuisance" factor of the wind farm and not to object. This simply cannot be tolerated with a token nod at E-P-22.

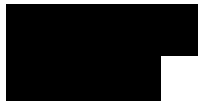
We also draw your attention to the Disturbance Displacement of 1km in suggested for SPAs in Policy E-P-12, 2(c). From our ongoing research with regard to displacement in the Graffy application for Hen Harriers and other avi-fauna 1km seems to fall well below Scottish National Heritage thresholds accepted as de facto by the NPWS.

We particularly welcome the exceptions laid out in Policy E-P-23 in that wind farms shall not be acceptable in the proximity of Glenveagh National Park, in the Gweebarra, in areas of Extremely High Scenic Amenity, in St John's Point or in the fresh water pearl mussel rivers. However, we note that the five catchments (Clady, Eske, Glaskeelin, Leannan, Owencarrow and Owenea) were previously named in the Plan. See the strikethrough text of Ref 18 / Deleted Technical Standard / part (e). We would respectfully suggest that for clarity the six catchments should again be named in new Policy E-P-23. In essence all areas in this E-P-23 must surely be among some of Donegal's last remaining great wilderness areas. Thus, we are strongly of the opinion that Council should discourage any further greenfield wind farm sites. We could quadruple output by repowering many of our dated turbines with very low output power.

In conclusion, we broadly welcome the provisions in this variation of wind policy believe you that you will find much favour within the county, and beyond, for these proposals. You are setting down a clear marker that the developer egos and deep wallets will not henceforth run roughshod over our hills. More importantly the accompanying message should be that Donegal is not closed to further wind farms; it merely is striking a balance between turbines and residents and sensitive environments.

Thank you for considering our views and I would appreciate an acknowledgement.

Yours cordially



Graffy Environmental Group



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