

The Altnapaste  
Landowners Committee

Co. Donegal

Wind Energy CDP Variation  
Central Planning Unit  
Donegal County Council  
County House  
Lifford  
Co. Donegal  
F93 Y622

**Re: Proposed Variation to the County Donegal Development Plan 2018 -2024 (As Varied)  
in respect of a Wind Energy Policy Framework**

Dear Sirs,

We refer to the above and to the Map 8.21 Wind Energy Amendment Item No. 20 April 2022. PDF as outlined on the Donegal County Council Website detailing proposed designation variations to the 2018 – 2024 County Development Plan in relation to wind energy.

As a collective group of landowners based in the Altnapaste, Ballybofey, we commissioned and funded our own feasibility and environmental impact report which was previously submitted to your department in 2017 in advance of the adoption of the current County Development Plan.

Having now reviewed the draft variations to the plan, we would be obliged if you would again revise our application to have the lands designated as “Acceptable in Principle” or “Open to Consideration” based on the new criteria as set out in the updated legislative national framework.

We trust that you will revert in due course and keep us informed as to the progress of our application. If applicable, we will require a detailed review of why lands contained in our submission are not eligible as “Acceptable in Principle” or “Open to Consideration” under the terms of the revised plan,

Yours faithfully,

**The Altnapaste Landowners Committee**

DONEGAL COUNTY COUNCIL  
RECEIVED  
- 3 JUN 2022  
CENTRAL PLANNING UNIT



**HARLEY NEWMAN**  
PLANNING CONSULTANTS

SUBMISSION

TO THE

DRAFT COUNTY DONEGAL DEVELOPMENT PLAN  
2018-2024

IN RESPECT OF

LANDS AT

ALTNAPASTE

BALLYBOFEY

ON BEHALF OF

THE ALTNAPASTE LANDOWNERS COMMITTEE

AUGUST 2017

CONALL NEWMAN BA MRUP MIPI

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DONEGAL COUNTY COUNCIL  
RECEIVED

- 3 JUN 2022

CENTRAL PLANNING UNIT

Senior Executive Planner  
Central Planning Unit  
Donegal County Council  
County House  
Lifford

25<sup>th</sup> August 2017

**Re: Lands at Altnapaste, Ballybofey, County Donegal.**

On behalf of The Altnapaste Landowners Committee, owners of lands located at Altnapaste, Ballybofey as indicated in Figure 1.1 below, this office has been requested to make a formal submission for consideration in respect of the published Draft County Donegal Development Plan 2018-2024 and the preparation of the County Donegal Development Plan 2018-2024. The

This submission refers particularly to lands (measuring 12.8km<sup>2</sup>) located at Altnapaste, Ballybofey as referred to above in the context of the wind energy provisions as contained in the Draft County Development Plan 2018-2024 and specifically requests that the subject lands be designated as '*Open to consideration*' on Map 8.2.1 Wind Energy of the Draft County Development Plan as outlined below.

It is considered that the subject lands, which partially include and adjoin lands designated as 'Open to Consideration' in the Draft County Development Plan, should in the interests of achieving climate change emission targets, realising wind energy potential in Donegal and delivering appropriate sustainable development, should also be designated as '*Open to Consideration*' in the County Donegal Development Plan 2012-2024.

In keeping with such a designation it is also requested that the landscape classification for the subject lands be correspondingly designated as Moderate Scenic Amenity as outlined below.

## National Context

Climate change is now widely recognised by the scientific community, Governments and citizens worldwide as one of the most defining challenges of our time. Human activities are significantly contributing to natural climate change through our emissions of greenhouse gases, and the burning of fossil fuels is known to be the largest contributory factor to climate change. In an Irish context, the expansion in the Irish economy and population has contributed to a 25% increase in Ireland's greenhouse gas emissions over the past 15 years. Climate change due to increased greenhouse gas emissions is now accepted as perhaps the most significant policy issue nationally and indeed internationally.

Successive government policy on energy since the mid 1990's has focused on the development of renewable energy sources to minimize greenhouse emissions and pollutants. Today national energy policy is clearly aimed at reducing greenhouse gas emissions and the country's dependency on fossil fuels, with the primary vehicle for attaining the reduction focused on renewable energy sources. Wind energy is identified as the principal form of renewable generation.

Coupled with increasing uncertainty in energy supply, the ability to harness renewable energy such as wind energy will be critical in decarbonising the Irish economy and meeting our national and international renewable energy and climate change commitments and obligations. The Irish State's target of generating 40% of the State's total electricity consumption from renewable sources by 2020 is ambitious and will only be attainable through the adoption and implementation of appropriate development policies. It is envisaged that wind energy will provide the vast majority of renewable energy in helping to achieve this target.

As County Donegal is the location in Ireland with the greatest wind energy potential, it is vital that the county's wind energy development policy and associated technical standards, as contained in the Donegal County Development Plan, are able to fully harness that potential.

## Regional Context

The Border Regional Planning Guidelines (RPG)'s set out overall strategies which promote the ongoing sustainability and growth of the region over the period 2010-2022.

Chapter 4 of the RPGs outlining the Regional Economic Strategy states that existing and potential areas for future growth and development in the border region include, amongst others, renewable energy based on the natural resource base.

Chapter 5 sets out the key physical infrastructure needs of the border region which are required to ensure the successful delivery and implementation of the Settlement and Economic Strategies. A key area of priority investment is Renewable Energy Infrastructure. The Guidelines recognise the considerable potential that exists for the utilisation of renewable energy generation, particularly wind.

The Border Region strongly supports the national targets for renewable energy and reducing energy consumption, and seeks to contribute to achieving these targets through the development of sustainable energy policies and practices.

In partnership with constituent Local Authorities, the Border Regional Authority aims to develop an integrated Regional Energy Strategy on renewable energy generation, identifying an optimal mix of renewable energy sources and proposed locations for development, to ensure consistent and complementary development across the border region. The border region recognises that it is ideally located to make significant contributions, through wind energy, to the revised targets for renewable energy generation of 40% with resulting economic benefits.

## **SUBMISSION REQUEST**

As indicated this submission requests that the subject lands be designated as '*Open to consideration*' on Map 8.2.1 Wind Energy of the Draft County Development Plan 2018-2024 and also that the landscape classification for the subject lands be correspondingly designated as Moderate Scenic Amenity as outlined below.

In support of this submission, an appraisal of the landscape and visual context of the subject lands has been undertaken which has been informed by a comprehensive desk-top study and site visit to assess the landscape character and sensitivity of the subject lands within the wider landscape context.

This assessment also examined the landscape policy and objective provisions contained within the Draft Donegal County Development Plan 2018-2024 in respect of the subject lands, as well as an examination of the current Landscape Character Assessment of County Donegal as it relates to the subject lands.

### **Landscape Context of the Subject Lands**

The majority of the lands are located within an upland area reaching an elevation of approximately 400m AOD at Croaghbrack Hill to the south of the subject lands. Other hills within the subject lands include the hills of Garranbane (306m AOD) and Pollakeeran Hill (370m).

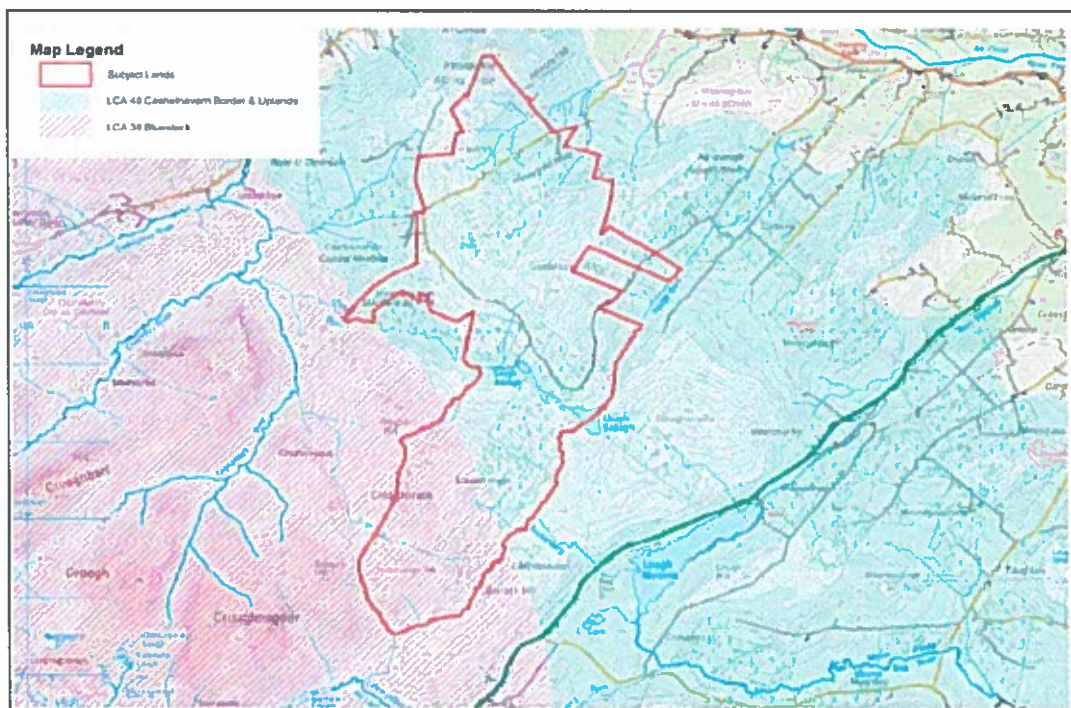
The land cover within the subject lands comprises mainly of coniferous forestry, upland blanket bog and grass and scrub land, with some agricultural fields to the north of the subject lands near the Finn Valley.

Figure 1.1 illustrates the location and extent (12.8km<sup>2</sup>) of the subject lands.



## Landscape Character Assessment of County Donegal

The Landscape Character Area (LCA) map for County Donegal indicates that the subject lands traverse across two separate LCAs, namely LCA 38 Bluestack at the western section of the lands; and LCA 40 Cashelnavern Border and Uplands which covers the majority of the subject lands. Figure 1.2 illustrates the subject lands within the context of these relevant LCAs and a short synopsis of these LCAs follows below.



**Figure 1.2: Subject Lands within the context of LCA38 Bluestack and LCA40 Cashelnavern Border and Uplands**

### LCA 38 Bluestack

The Bluestack LCA is described as an inland landscape dominated by the Bluestack Mountain Range, a vast upland area of upland mountains, bog and lakes with dramatic and wide river valleys which form and frame views into and within the LCA. The settlement pattern is described as low density rural population in one off dwellings in the lower slopes of mountains and within the north western area of the LCA on river plains.



### **LCA 40 Cashelnavern Border and Uplands**

This LCA is described as a vast, mountainous and remote upland area characterised by peat covered hills and the mountain lakes of Lough Mourne and Lough Carn, and the Barnesmore Gap. The N15 runs along the valley floor of the Barnesmore Gap. This LCA contains areas of semi improved farmland nestled with single rural dwellings throughout the LCA which contrast with large swathes of commercial forestry plantations on the lower slopes and hills.

### **Draft Donegal County Development Plan 2018-2024**

The Draft Donegal County Development Plan sets out the overall strategy for the proper planning and sustainable development of the administrative area of Donegal County Council over the period from 2018 to 2024.

It is the case that the Draft Plan is generally supportive of the renewable energy sector and recognises the important role that wind energy will play in the future development of Donegal as highlighted by policies which include:

*E-O-1: To develop sustainably a diverse renewable energy portfolio to meet demands and capitalize on the County's competitive locational advantage.*

*E-P-2: It is a policy of the Council to facilitate the appropriate development of renewable energy from a variety of sources, including, hydro power, ocean energy, bioenergy, solar, wind and geo-thermal and the storage of water as a renewable kinetic energy resource, in accordance with all relevant material considerations and the proper planning and sustainable development of the area.*

*E-P-12: It is the policy of the Council to:*

*Consider the development of appropriate new wind energy developments within the areas identified as 'Open To Consideration' on the Wind Energy Map 8.2.1, subject to compliance with all other relevant objectives and policies contained within this Plan.*

Section 8.2.1 of the Draft CDP, which relates to Wind Energy, prescribes three policy/zoning areas for consideration of proposed new wind farm developments, and

alterations to existing wind farms within the County, namely, (1.) 'Open to Consideration'; (2.) 'Acceptable for augmentation of/improvements to existing wind farms'; and (3.) 'Not Acceptable'. It is the case that these three categories guiding windfarm development throughout the county are associated with the landscape classifications for the county as proposed in the Draft CDP, which in turn are linked to the Landscape Character Assessment (LCA) undertaken by the council.

Chapter 7 of the Draft Plan outlines the policies and objectives relating to the natural and built heritage, including landscape.

The Landscape Character Assessment (LCA) provides "*an analysis, characterisation and narrative of the component parts of the landscape of County Donegal*". It is noted that the Draft CDP states that the LCA "*is not to be construed as an accompanying policy document of this Plan*". The Draft CDP provides "*a policy context to build on the evidential approach*" of the '*Landscape Character Assessment of County Donegal*', which was endorsed by Donegal County Council in May 2016. However the Plan does not set out the evidential approach used to classify the County into three categories of Scenic Amenity, nor what the criteria are.

### Landscape Value and Sensitivity in the Draft Development Plan

The concepts of landscape value and sensitivity are related, but separate. Though Ireland does not have up-to-date guidance, the Consultation Draft of Guidelines on Landscape and Landscape Assessment (2000) describes these concepts separately, as does more up to date guidance (GLVIA 2013). Landscape value relates to the value attached to different landscapes by society, and can apply to areas of landscape as a whole, or individual elements or features (GLVIA 2013). Values often include landscape designations, but undesignated landscapes can also be valued.

The description of landscape sensitivity varies, however it includes consideration of the landscape value, as well as its susceptibility to change. Landscape sensitivity also relates to the type of change or development proposed. Although scenic qualities are important in both landscape value and landscape sensitivity, there are a number of other considerations included.

These concepts of landscape value and sensitivity are referred to interchangeably in the draft Plan, while several concepts are referred to under each category of Scenic Amenity - which creates a further difficulty in understanding the process of classification. The three categories appear to be categorising both value, sensitivity and capacity at the same time, though sensitivity should depend on the type of development proposed. Thus the rationale for including areas in the three categories is not clear.

CDP states that it categorises the landscape of the county into three layers of value, which is illustrated in Map 7.1.1 of the Draft CDP. The three layers of value have been classified as areas of 'Especially High Scenic Amenity', areas of 'High Scenic Amenity' and areas of 'Moderate Scenic Amenity'. It is noteworthy that the Draft Plan has stated that "*none of the landscapes of County Donegal have been classified as Low Value*", and therefore the areas of Moderate Scenic Amenity (MSA) represent the lowest of the three landscape value classifications in Donegal, while they still refer to these area as 'Unique'. The definitions for each of the areas of landscape value and classification are as detailed below:

- *Areas of Especially High Scenic Amenity (EHSA)*  
*Areas of Especially High Scenic Amenity are sublime natural landscapes of the highest quality that are synonymous with the identity of County Donegal. These areas have extremely limited capacity to assimilate additional development.*
- *Areas of High Scenic Amenity (HSA)*  
*Areas of High Scenic Amenity are landscapes of significant aesthetic, cultural, heritage and environmental quality that are unique to their locality and are a fundamental element of the landscape and identity of County Donegal. These areas have the capacity to absorb sensitively located development of scale, design and use that will enable assimilation into the receiving landscape and which does not detract from the quality of the landscape, subject to compliance with all other objectives and policies of the plan.*
- *Areas of Moderate Scenic Amenity (MSA)*

*Areas of Moderate Scenic Amenity are primarily landscapes outside Local Area Plan Boundaries and Settlement framework boundaries, that have a unique, rural and generally agricultural quality. These areas have the capacity to absorb additional development that is suitably located, sited and designed subject to compliance with all other objectives and policies of the plan.*

#### **Anomalies within Landscape Classifications:**

The Draft CDP acknowledges that within each of the above landscape classifications, and along the interface between the designations, *“there may be areas that do not fully meet the definition of the designation”*. The Draft CDP further states that such *“anomalies in landscape designation shall be considered individually and in the context of all other objectives and policies contained within this Plan, should an application for development be submitted in these areas (excluding wind energy proposals or ancillary works)”*.

If, as noted in the Plan, that it provides a policy context building on the evidential approach of the LCA to classify the County into three categories of ‘value’, any identification of anomalies should relate to the value and qualities of the land in the first instance. The issue of the sensitivity of that landscape to a particular type of development should be considered a separate issue, and at that stage, suitable developments considered or excluded.

#### **Classification of the Subject Lands in the Draft Plan**

Whilst the northern and eastern extremities of the subject lands are proposed to be classified as areas of High Scenic Amenity and Moderate Scenic Amenity respectively, the vast majority of the subject lands are proposed to be classified as an area of EHSA in the Draft CDP as indicated on Figure 1.2.1.

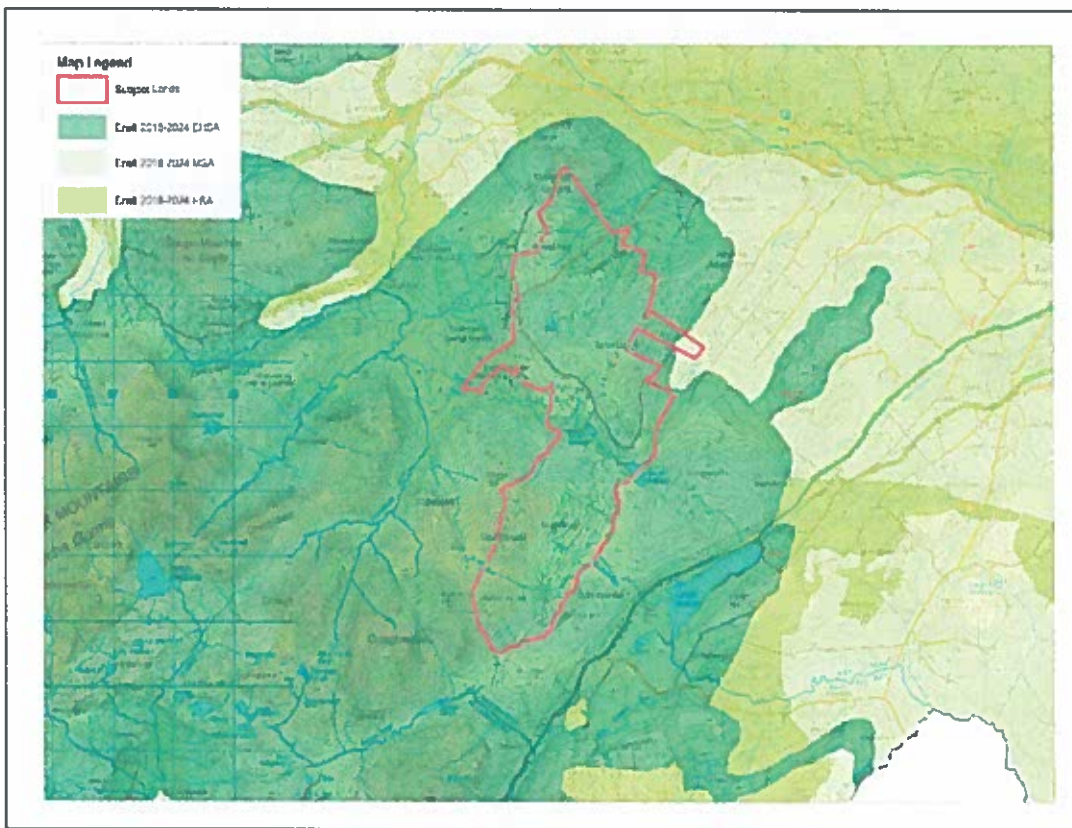


Figure 1.2.1 Subject Lands Landscape Category as classified in Draft CDP 2018-2024

The current Donegal CDP 2012-2018 features only one category of landscape classification, namely EHSA. As illustrated in Map 8 of the current CDP, much of the subject lands are classified as being within this designation of EHSA, however, large tracts of land on the eastern section of the subject lands are currently not designated as being EHSA. The landcover of this large area omitted from the current landscape designation is characterised by extensive coniferous forestry plantation.

Further to the proposed introduction of the additional landscape classifications of High Scenic Amenity and Moderate Scenic Amenity, the Draft CDP has proposed considerable extensions to the current area of EHSA in respect of the subject lands, including the assimilation of the large tract of conifer forestry plantation located within the subject lands currently not designated for ESHA. The LCA and the Plan do not include a rationale for the inclusion of this land as EHSA, nor for the designation of lands as Moderate or High Scenic Amenity.

## Potential Future Uses of Subject Lands

The extension of areas of EHSA in respect of the subject lands, as proposed in the Draft CDP, has significant implications for future development within this area, with the proposed Objective (NH-O-7) seeking:

*“To protect the areas of Especially High Scenic Amenity from intrusive and/or unsympathetic developments”.*

This has obvious repercussions for any potential wind energy development within the subject lands arising from this proposed landscape classification. Most notably, Map 8.2.1 of the Draft CDP, which relates to Wind Energy, as outlined above prescribes three policy/zoning areas for consideration of proposed new wind farm developments, and alterations to existing wind farms within the County, namely, (1.) ‘Open to Consideration’; (2.) ‘Acceptable for augmentation of/improvements to existing wind farms’; and (3.) ‘Not Acceptable’.

Figure 1.2.2 (see appendix 1) indicates Map 8.2.1 of the Draft CDP and outlines the particular designations or zonings in respect of the subject lands, which indicate that the subject lands are designated primarily as ‘Not acceptable’ for windfarm development. The eastern portion of the land is designated ‘Open to Consideration.’

In relation to the ‘not acceptable’ policy/zoning area, locations where wind energy proposals would be unacceptable have been identified having regard to their significant environmental, heritage and landscape constraints including *“areas identified as high and medium landscape sensitivity”*. Given that the Draft CDP has stated that *“none of the landscapes of County Donegal have been classified as Low Value”*, it is difficult to reconcile this statement with the stated objectives from the current and Draft plan as outlined to support renewable energy and the designations within the Draft CDP of lands that are ‘open to consideration’ for wind farm development. While it is acknowledged that ‘landscape sensitivity’ and ‘value’ may have separate meanings, this is not clarified in the Draft CDP or, indeed, in the current Landscape Character Assessment of County Donegal where there are no existing

landscape sensitivity ratings to accompany the various landscape character areas or types provided in this document.

Whilst it is acknowledged that the provisions of proposed Objective NH-O-7 of the Draft CDP are considered appropriate, the methodology employed in the designation of areas of Especially High Scenic Amenity remains unclear. Moreover, the rationale for the extension of areas of Especially High Scenic Amenity, in the context of the subject lands, is particularly unclear and devoid of any explanation, having regard to the nature of the landholdings.

### Appraisal of Visual Context

The visual context of the subject lands are examined here in relation to views of the surrounding landscape that are available from and to the subject lands from the surrounding area. The selection of photo locations is designed to give a representative range of views of the subject lands from a variety of distances and aspects, as well as at varying elevations. Figure 1.2.3 (see appendix 2) illustrates the various photo locations employed in this assessment for views from and to the subject lands.

#### Views from the Subject Lands

Due to the size and shape of the subject lands, there are a range of views available from the site. However, large parts of the lands are composed of coniferous forestry plantation which would restrict views. Similarly, a number of vistas from the subject lands are terminated by the elevated topography of the surrounding area, as characterized by the number of hills adjacent to the lands as described above, which frames and screens the subject lands within the context of the surrounding area. Figure 1.2.3 illustrates the locations of photos taken within the subject lands.

Plate 1 depicts the view from Location P1, near the centre of the subject lands looking west towards the Bluestacks Mountains complex, where the vista is dominated by Gaugin Mountain. This view also illustrates the distinct contrast in landscapes between the subject lands and the area to the west, which appears appropriately

designated as an Area of Especially High Scenic Amenity under the current and Draft CDP as it fulfils the relevant criteria.



**Plate 1: View from Location P1 within the subject lands west towards the Bluestack Mountains complex**

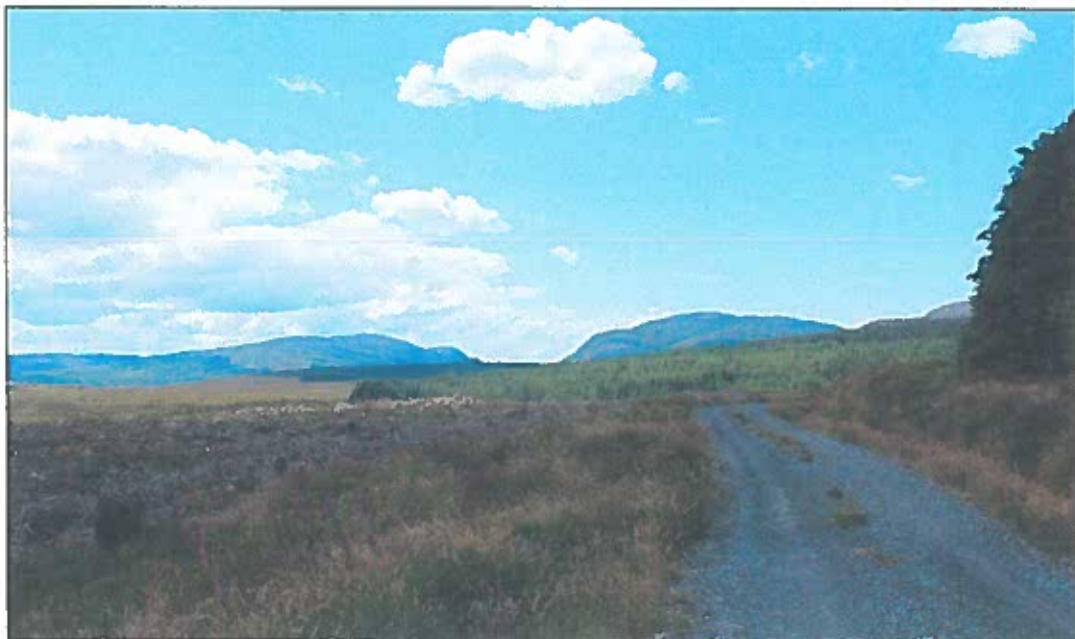
Plate 2 illustrates the view from Location P1 looking southwest within the subject lands, where the view is dominated by a gentle ridge line associated with Garrabane Hill which provides screening for the subject lands on the eastern side of this ridge line. Landcover within this view is dominated by forestry conifer plantation, rough grassland grazed by sheep and an access track which runs from in a west-southeast-northeast direction within the centre of the subject lands.





**Plate 2: View from Location P3 within the subject lands looking southwest along access track**

Plate 3 illustrates the view looking south towards the Barnesmore Gap from Location P2 near the centre of the subject lands. The view is terminated by the summits of the Barnesmore Gap, with landcover to the south dominated by conifer forestry plantation in intermediate and long distance views and is characteristic of landscapes/landforms common in Donegal. Additional landcover is characterised by rough grassland and scrub and stretches of deforested areas, as well as an access track which runs in a south to northeast direction in this area of the subject lands.



**Plate 3: View from Location P2 within the subject lands looking south towards Barnesmore Gap**

Plate 4 depicts the view from Location P2 looking northeast beyond the boundary of the subject lands to areas of similar rolling terrain with conifer plantation landcover which is proposed to be designated as areas of Moderate Scenic Amenity under the Draft CDP. Landcover in this view of the subject lands is again characterised by conifer forestry with rough grassland and scrub and areas of deforestation.



**Plate 4: View from Location P2 within the subject lands looking northeast beyond**

Plate 5 illustrates the view from Location P3 looking north within the subject lands towards Finn Valley and Cark Mountain, where a number of wind turbines have been successfully assimilated into the landscape. This image illustrates the gradual decrease in elevation for the topography of the subject lands as one moves further north towards the valley. The ridge line associated with Garrabane Hill and conifer plantation provides screening for the subject lands to the west and truncates the landscape in this area from the more high-value landscape associated with the Bluestack Mountain complex to the west of the subject lands. Landcover within this area of the subject lands is again characterised by large stretches of conifer forestry plantation, rough grassland and scrub, hedgerows and forestry access tracks, all of which common throughout Donegal.



**Plate 5: View from P3 within the lands looking north towards Finn Valley and Cark Mountain**

#### **Views towards the Subject Lands**

Plate 6 depicts the view towards the subject lands from north of Clogher village (Location P4), located directly north of the subject lands and across Finn Valley. This elevated viewpoint provides an indication of the topography and landcover of the subject lands within the wider landscape setting.



**Plate 6: View from Location P4 looking south towards the subject lands and across the Finn Valley**

Plate 7 depicts the view from Location P5, north of the subject lands on the R252 Regional Road. This area to the north of the subject lands is characterised by rolling terrain dominated by agricultural landcover. Significant screening from this roadside view towards the south of the subject lands is provided by extensive tree and hedgerow planting. This view illustrates the considerable amount of coniferous forestry plantation located on the uplands of the subject lands.



**Plate 7: View from Location P5 south towards the subject lands across the Finn Valley from the R252 Regional Road**

Plate 8 illustrates the view of the subject lands from Location P6 which is located to the northeast of the subject lands on the R252 Regional Road. Similar to the view provided in Plate 7, this image illustrates the level of screening through conifer forestry and other trees and hedgerows within the intermediate landscape between the R252 Regional Road and the subject lands.



**Plate 8: View from Location P6 south towards the subject lands across the Finn Valley from the R252 Regional Road**

Plate 9 depicts the view from Location P7, located north of the subject lands along the R 253 Regional Road, southwards within the lands. This area to the north of the subject lands is characterized by rolling terrain dominated by agricultural landcover. Significant screening from this roadside view towards the south of the subject lands is provided by extensive tree and hedgerow planting, with coniferous forestry plantation which dominates the uplands of the subject lands.



**Plate 9: View from northern extremities of subject lands southwards (Location P7)**

Plate 10 depicts the view near the northern boundary of the subject lands (Location P8) looking south. This view is again dominated by coniferous forestry plantation as the topography of the lands rises. More immediate landcover in this view consists of rough grassland and some scrub.



**Plate 10: View from further north of subject lands southwards (Location P8)**

Further viewpoints of the subject lands from the N15 National Primary Route between Lough Mourne and Barnesmore Gap were also examined to ascertain how much, if any of the subjects lands, could be viewed from this approach.

Owing to a combination of the elevated topography of the lands on the north western side of the N15 route in this area and the distance of the subject lands from the N15, no view or prospect of the subject lands is available. This further emphasises the screening characteristics of the subject lands from considerably more sensitive landscapes such as the Barnesmore Gap.

## **Proposed Amendments to Draft County Development Plan**

Within the context of the above assessment, there is considerable scope for amendments to the scenic amenity and wind energy designations proposed in the Draft County Development in respect of the subject lands. In this regard, Figure 1.3 (appendix 3) illustrates suggested amendments to the scenic amenity designations in respect of the subject lands currently proposed in the Draft Donegal CDP 2018-2024.

The proposed scenic amenity designations illustrated in Figure 1.3 have taken account of the findings of visual appraisal presented above, as well as scenic designations within the current Donegal County Development Plan 2012-2018. In this regard, land use cover, topography and vistas to and from the subject lands are key criteria which have informed the proposed scenic amenity amendments in respect of the subject lands.

As illustrated in Figure 1.3, the proposed amendments relate to a re-designation of the scenic amenity for the subject lands to MSA for the majority of the lands and the introduction of a HSA designation along the western boundary of the subject lands which transitions into an EHSA designation at the western extremities of the subject lands and beyond. The EHSA designation for these areas beyond the subject lands to the west and south is considered to be entirely appropriate and reflective of the considerably higher landscape value associated with the Bluestack Mountain range to the west and south and the Barnesmore Gap to the south of the subject lands.

The rationale for these proposed designation amendments is largely dictated by the considered value and topography of the landscape surrounding the subject lands, which as previously stated, are framed by a number of prominent hills to the west and south of the subject lands and which provide a distinct contrast to the landscapes beyond the boundaries of the subject lands. In this regard, the lands to the west of Altnapaste Hill, Clogher Hill, Clogheravaddy Hill, as well as west and south of Brown's Hill and Barrack Hill, which surround the subject lands are considered to be of a distinctly higher value of landscape than that within the subject lands. The MSA scenic designation for the majority of the subject lands is considered to be a more accurate portrayal and in keeping with the scenic value of those lands to the east and

northeast of the subject lands which are not classified as EHSA areas under the current Donegal CDP and are proposed to be designated as MSA in the Draft Plan for the majority of these lands.

In light of these proposed scenic amendments and the considered landscape and scenic amenity value of the subject lands, there is sufficient scope for potential wind energy development within the subject lands. This is already acknowledged in the current Donegal CDP, where a large tract of land dominated by commercial conifer plantation is deemed as being 'Open to Consideration' for wind energy development. Moreover, Map 8.2.1 '*Wind Energy*' of Draft Donegal CDP also recognises the potential for wind energy development within the area, with a similarly large tract of land on the eastern flank of the subject lands proposed to be designated as 'Open to Consideration' for wind energy development.

On the basis of the landscape and visual assessment conducted in respect of the subject lands, it is considered that an extension of this current 'Open to Consideration' designation to the majority of the subject lands is warranted. Figure 1.4 (see appendix 4) herewith illustrates the proposed amendments to the Map 8.2.1 of the Draft Donegal CDP in respect of the subject lands. Again, the spatial extent of the proposed amendment to 'Open to Consideration' amendment is framed by the prominent hills to the west and south of the subject lands which provide for a legible 'containment' for potential wind energy development within this area.

The rationale for this relates to the more moderate landscape/scenic value characterised throughout the majority of the subject lands and takes cognisance of the DoEHLG Wind Energy Guidelines (2006) in relation to key aesthetic considerations for the siting and design of potential wind energy developments within the Mountain Moorland landscape character type of the subject lands (Appendix 5 refers to the provisions of the DoEHLG Wind Energy Guidelines in the context of the subject lands).

In this regard, the subject lands display the key characteristics necessary to successfully assimilate potential wind energy development into its landscape. These include:



- Location – the subject lands are adequately framed by surrounding hills and ridge lines thereby partially ‘containing’ potential development.
- Spatial Extent – the subject lands are characterised by an extensive area of continuous unenclosed ground and sufficiently dimensioned to accommodate a wind energy development.
- Spacing and Layout – the subject lands are sufficiently proportioned to provide for an array of turbine spacing and layout options.
- Height – the topography and extent of this mountain moorland landscape type is sufficiently scaled to accommodate a number of potential turbine heights.

Accordingly, the proposed amendments to Map 8.2.1 of the Draft Donegal CDP are considered to be appropriate and are based on a comprehensive assessment of the landscape value of the subject lands as well as its characteristics to assimilate potential wind farm development into its landscape. The subject lands are not considered to be of EHSA or HSA standard and given that a significant area of the subject lands is already designated as being ‘Open to Consideration’ under the current Donegal CDP, an extension of this designation in line with that illustrated in Figure 1.4 of this submission is considered appropriate and will provide a viable area for harnessing the wind energy potential in County Donegal.

It must be stated, however, that whilst the subject lands exhibit a number of properties which justify the amendments to their scenic amenity and wind energy designations as proposed in this submission, a fundamental principle of the planning system is the assessment of all planning applications on their individual merit together with additional assessment processes such as Environmental Impact Assessment (EIA) and Appropriate Assessment (AA).

Notwithstanding, the assessment carried out hereunder indicates that the subject lands have the capacity to absorb sensitively located development that will enable the assimilation into the landscape and not significantly detract from the quality of the immediate landscape or any high-quality landscapes within the wider area.

## Natura 2000 Sites

In addition to the above appraisal of the landscape and visual context of the subject lands an ecological appraisal of the potential impact of the proposed re-classification of the subject lands on Natura 2000 sites has also been undertaken as part of this submission and is included within appendix 6.

The appended ecological report confirms that the subject lands do not include or border any SACs or SPAs and as such it will not have any direct impacts on the ecology of designated/high conservation value habitats or species for which SACs/SPAs have been designated. The report concludes:

*The subject lands are not located within a Natura 2000 and therefore it is anticipated that re-zoning of lands would not directly impact negatively on any Natura 2000 sites. However, site-level Appropriate Assessment will be required to determine all potential effects and ensure appropriate mitigation is applied in order to eliminate any negative effects on the integrity of Natura 2000 sites.*

## Conclusion

The lack of a clear rationale in the Draft Development Plan for the three categories of landscape classifications, combined with confusing terminology in which the three categories of Scenic Amenity include references to the different concepts of landscape value, sensitivity and capacity, makes it difficult to understand the rationale for the classifications established.

There are three categories, which are Moderate, High and Especially High areas of Scenic Amenity. There are no areas of Low Scenic Amenity, Moderate being the lowest category of Scenic Amenity. However the description of the Moderate Scenic Amenity areas, the lowest category, refers to these areas as 'unique rural and generally agricultural quality' which suggests a different description to Moderate.

From the desk-top review and on-site landscape and visual assessment conducted in respect of the subject lands, there appears to be no rationale for the proposed extension of the current EHSA designation to cover the vast majority of the subject lands. While some areas of the site to the west of the subject lands clearly fulfil the description of areas of EHSA, it is considered that there is no clear rationale for the subject lands or the areas to the southeast of the subject area, which are sloping lands covered in coniferous forestry, to be considered in this category. An examination of the land cover of the site and surrounds does not show a clear distinction between the currently undesignated lands which are proposed as EHSA to the southeast of the site, and the adjacent lands designated as Moderate Scenic Amenity.

The subject lands benefit from considerable screening from local changes in topography. In this regard, it is clear that the subject lands offer a distinct contrast to more considerably high-quality landscapes in the wider area such as the Bluestack Mountains range or the Barnesmore Gap which are appropriately classified as areas of EHSA within the current County Development Plan. Accordingly, it is contended that the vast majority of the subject lands would be more appropriately designated as Moderate Scenic Amenity (MSA).

Within this context, it is considered that the proposed extension of the current EHSA designation to other areas of the subject lands, as envisaged in the Draft CDP, is not merited. The landscape features of the subject lands, as illustrated above, are not considered to be of sufficient value to be classified as a 'sublime' natural landscape of the 'highest quality', which areas of ESHA are considered to comprise of and which is evidently the case in respect of the Bluestack Mountains range to the east of the subject lands or Barnesmore Gap to the southwest of the lands. The subject lands present a working rural landscape in the form of agriculture and coniferous forestry which are common throughout County Donegal. Within this context, the subject lands are considered to be more applicable as MSA where such landscapes are considered to have "*a unique, rural and generally agricultural quality*", and "*have the capacity to absorb additional development that is suitably located, sited and designed subject to compliance with all other objectives and policies of the plan*".

Within this context, the proposed amendments to Map 8.2.1 of the Draft Donegal CDP in respect of the subject lands are considered to be appropriate and are based on a comprehensive assessment of the landscape value of the subject lands as well as its characteristics to assimilate potential wind farm development into its landscape. The subject lands are not considered to be of EHSA or HSA merit and given that a significant area of the subject lands is already designated as being 'Open to Consideration' under the current Donegal CDP, an extension of this designation in line with that proposed in this submission is considered appropriate and will provide a viable area for harnessing the wind energy potential in County Donegal.

Notwithstanding the above, it should be noted that the central tenet of the planning system is the assessment of all planning applications on their individual merit together with additional assessment processes such as Environmental Impact Assessment (EIA) and Appropriate Assessment (AA). In this respect, the planning application process provides the appropriate arbitration mechanism to assess proposals on a site-specific basis, subject to standard criteria, to ensure proposed wind farm projects are in accordance with proper planning and sustainable development of the area, as well as being in accordance with national policies and objectives. However whilst the planning application process assumes essential importance, the development plan provisions including policy and zonings possess vital significance in that process.

In conclusion, it is contended that the subject lands have sufficient capacity to absorb prospective wind energy development and demonstrate a number of physical attributes which accord with the Wind Energy Development Guidelines on siting and layout of wind farms within landscapes. It is requested therefore that the subject lands be designated as '*Open to consideration*' on Map 8.2.1 Wind Energy of the Draft County Development Plan and correspondingly designated as Moderate Scenic Amenity as outlined in this submission.

It is requested that this submission forms part of considerations in the preparation of the Donegal County Development Plan 2018-2024.

Yours sincerely

Conall Newman

Encl:

Appendix 1: Figure 1.2.2 Map 8.2.1 of the Draft CDP – Windfarm Zonings

Appendix 2: Figure 1.2.3 Photo Locations at Subject Lands

Appendix 3 Figure 1.3 Proposed amendments to Scenic Amenity Designations

Appendix 4 Figure 1.4 Proposed Amedments to Map 8.2.1 Draft CDP

Appendix 5 DoEHLG 'Wind Energy Development Guidelines' (2006)

Appendix 6 Ecological Natura Site Appraisal prepared by Earthy Matters

Appendix 7 Altnapaste Landowners Committee Members

## Appendix 1

Figure 1.2.2 Map 8.2.1 of the Draft CDP – Windfarm Zonings

## Appendix 2

### Figure 1.2.3 Photo Locations at Subject Lands

## Appendix 3

### Figure 1.3 Proposed amendments to Scenic Amenity Designations



Appendix 4

Figure 1.4 Proposed Amedments to Map 8.2.1 Draft CDP

## Appendix 5

### Reference to DoEHLG 'Wind Energy Development Guidelines' (2006) in context of subject lands

The Department of the Environment, Heritage and Local Government's 'Wind Energy Development Guidelines' (DoEHLG, 2006) provide advice to Planning Authorities on planning for wind energy developments through the Development Plan process and in determining applications for planning permission. The guidelines are also intended to be of assistance to developers and the wider public in considering wind energy development.

Chapter 6 of the DoEHLG guidelines provides guidance in relation to the siting and design of wind energy developments. The guidelines state that landscape character types provide a useful basis for the practical application of the siting and design guidelines. Six landscape character types were identified, which represent most situations, as follows:

- Mountain moorland,
- Hilly and flat farmland,
- Flat peatland,
- Transitional marginal land,
- Urban/industrial settings and
- The coast.

The subject lands are located in an upland area and ranges in elevation from approximately 150 metres AOD to a height of approximately 400 metres AOD. The landcover varies within the study area, comprises mainly of coniferous forestry, upland blanket bog and grass and scrub land. There are some agricultural fields to the north of the subject lands. Of the landscape character types referred to in the DoEHLG guidelines, the subject lands contain characteristics that mostly pertain to Mountain Moorland. However, there are some parts of the subject lands which are better described by Transitional Marginal Land.

The DOEHLG guidelines list the key characteristics of Mountain Moorland landscape type as follows:

- Peaked, ridged or rolling mountains and upland with steep sides or gently formed valleys.
- Generally unenclosed.
- Landcover comprising blanket bog, amottling of heather, wild grasses and some rush in wet flushes.
- A landscape type of relative remoteness and often comprising pristine, unspoilt and remote landscapes.

Guidance in relation to location, spatial extent and scale, spacing, layout, height and cumulative effect is provided for each landscape character type in the DoEHLG guidelines. For Mountain Moorland, these are detailed below:

#### **Location**

The DoEHLG guidelines state that it may be acceptable to locate wind energy developments on ridges and peaks, and, in certain instances, on a saddle between two peaks where the development will be framed by the higher ground. A third acceptable location is lower down on sweeping mountainsides.

#### **Spatial Extent**

Spatial extent is the area covered by a wind energy development, reflecting the number of turbines involved and their spacing. The DoEHLG guidelines state that the spatial extent of a wind energy development should be balanced and in scale with its landscape context. With regards to areas of mountain moorland, larger wind energy developments can generally be accommodated because they correspond in terms of scale, given the typical extensive areas of continuous unenclosed ground.

#### **Spacing**

The DoEHLG guidelines state that all spacing options are usually acceptable within a mountain moorland landscape character type. Where a wind energy development is clearly visible on a crest or ridge, there is considerable scope to vary the rhythm,

though on simple ridges, regular spacing maybe more appropriate. On sweeping and continuously even areas of mountain moorland or upland plateaux, regular spacing may be preferable.

### **Layout**

All layout options are usually acceptable within a mountain moorland landscape character type. The DoEHLG guidelines state that the best solutions would either be a random layout, and clustered where located on hills and ridges, or a grid layout on sweeping and continuously even areas of moorland or plateaux.

### **Height**

There is generally no height restriction on mountain moorlands as the scale of the landscape is so great. Shorter turbines may be more appropriate where they are located on small peaks and outcrops in order to maintain an appropriate scale. Profile, whether even or uneven, is dependent on topography: the more rugged and undulating, the more uneven it will be. The profile of the wind energy development should not necessarily run in parallel to that of the topography.

### **Cumulative Effect**

With regards to cumulative effect, the DoEHLG guidelines state that the open expanse of such landscape types as mountain moorland can absorb a number of wind energy developments, depending on their proximity. The cumulative impact will also depend on the actual visual complexity of the landform, whether steeply rolling, undulating or gently sweeping. The more varied and undulating an area is topographically, the greater its ability to absorb and screen wind energy developments. The aesthetic effect of wind energy developments in these landscapes is acceptable where each one is discrete, standing in relative isolation.

## Appendix 6

### Ecological Natura Site Appraisal

## Appendix 7

### Altnapaste Landowners Committee

#### Members

John Griffith  
Margaret Griffith  
John Bustard  
Andrew McCreery  
Robert McCreery  
Gavin Mackie  
Karol McElhinney  
John McGinty  
Patrick McGinty  
Tommy McGinty  
Declan McGinty  
Dermot McGinty  
Patricia McGinty  
John Gildea  
Henry Kee  
Lynn Kee  
Leslie Taylor

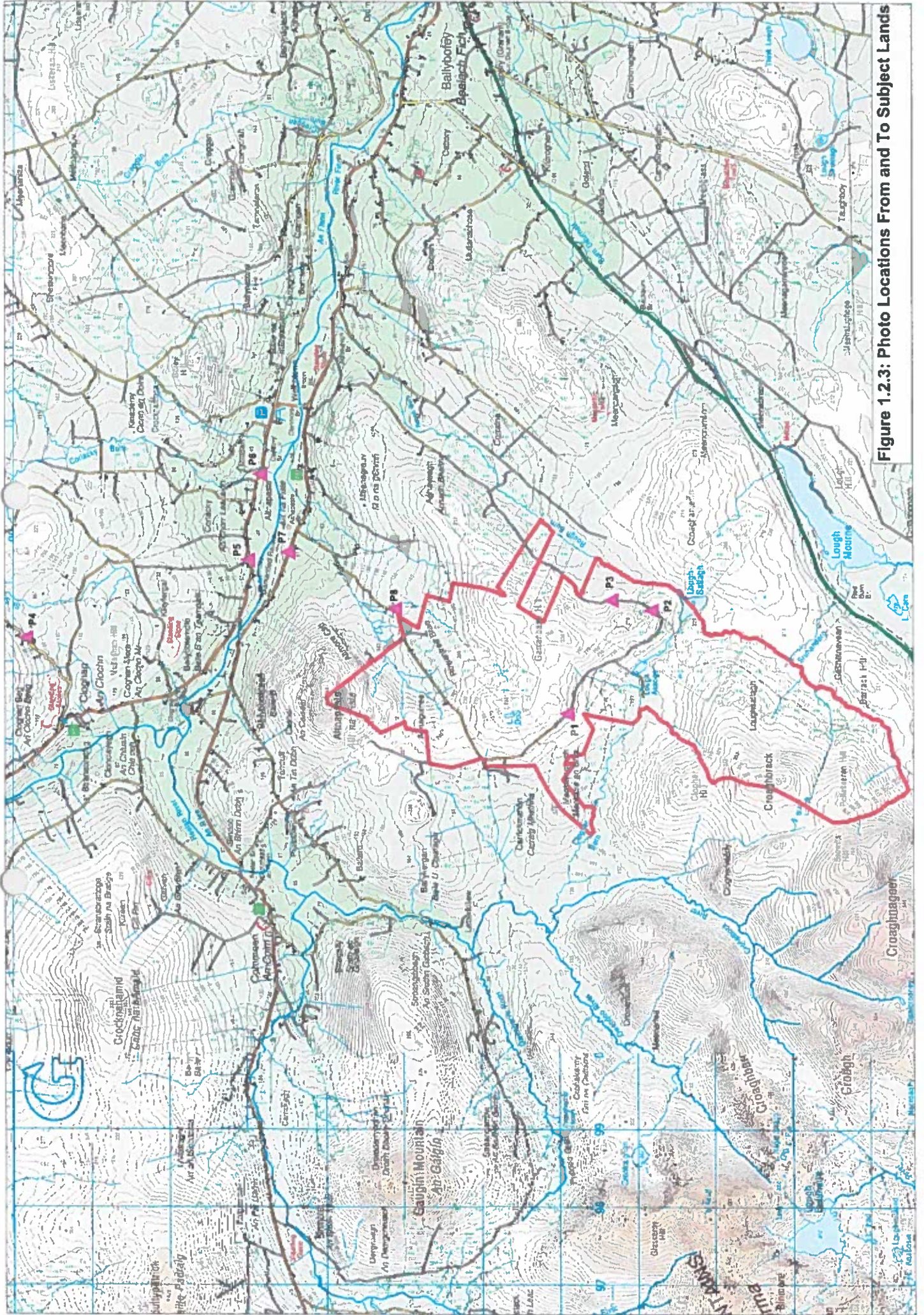


Figure 1.2.3: Photo Locations From and To Subject Lands

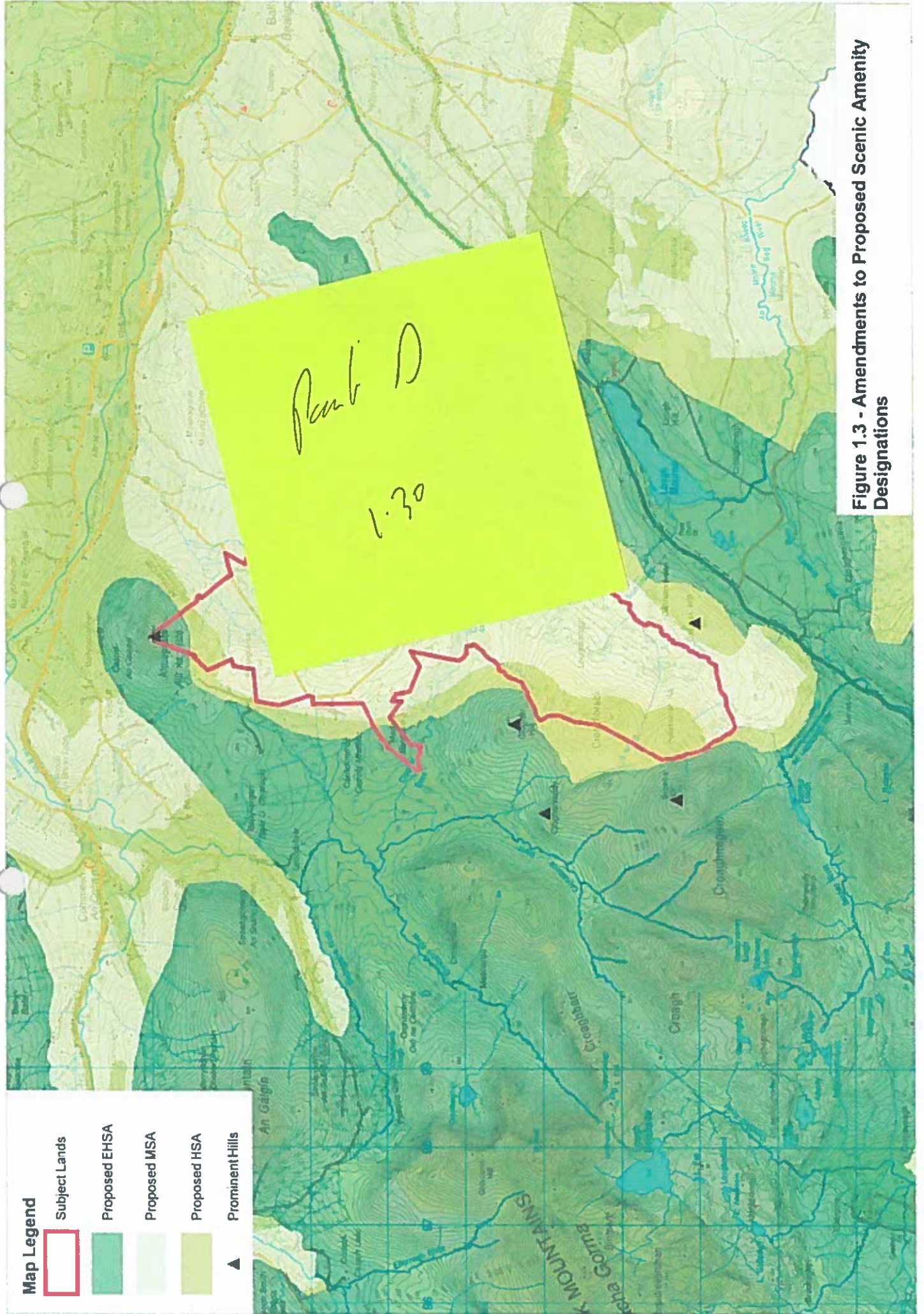
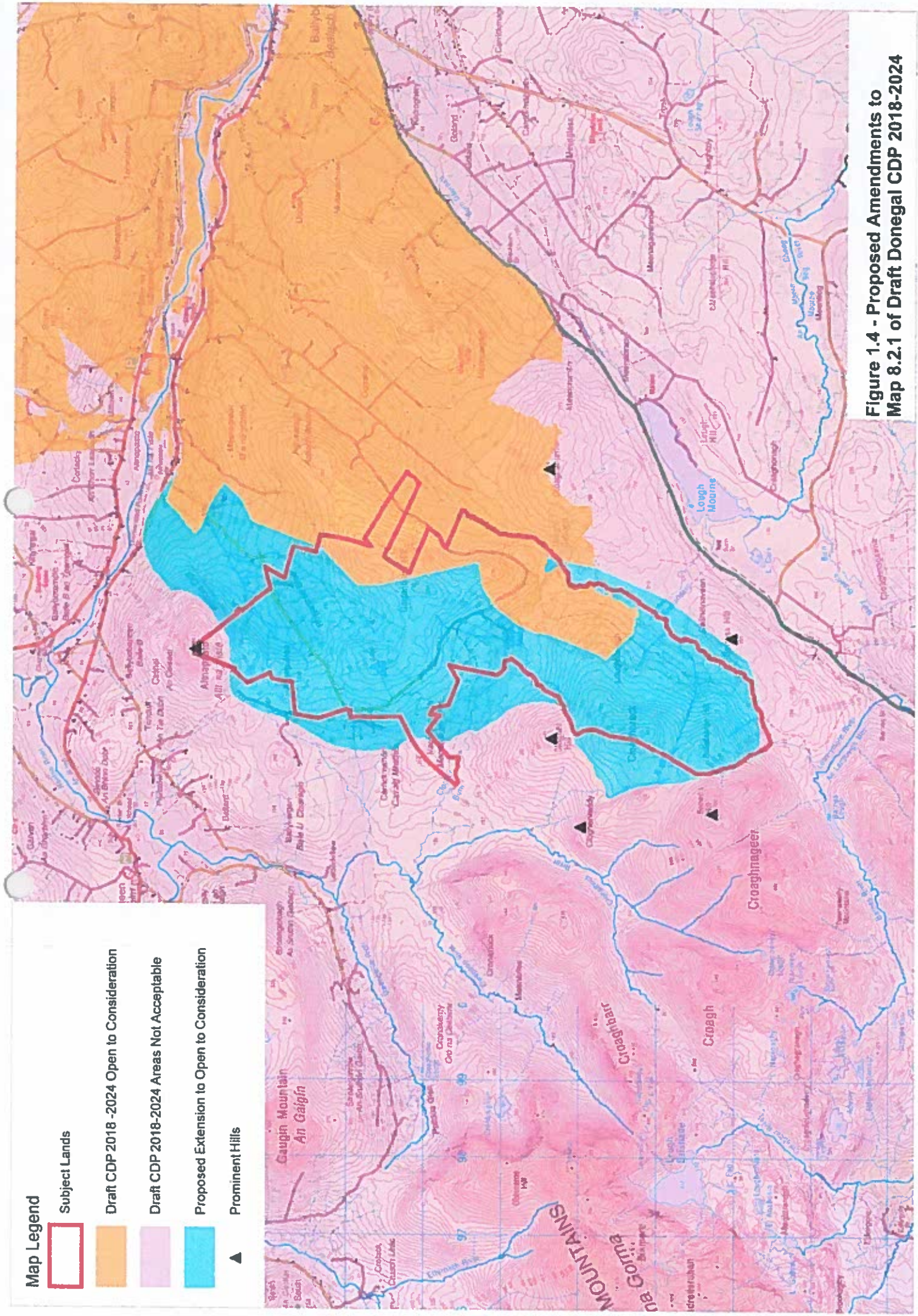


Figure 1.3 - Amendments to Proposed Scenic Amenity Designations





**Map Legend**

- Subject Lands
- Draft CDP 2018-2024 Open to Consideration
- Draft CDP 2018-2024 Areas Not Acceptable
- Proposed Extension to Open to Consideration
- Prominent Hills

**Figure 1.4 - Proposed Amendments to Map 8.2.1 of Draft Donegal CDP 2018-2024**

**Ecological Report  
in support of submission to  
Donegal County Development Plan  
for the re-zoning of lands  
around Altnapaste, Co. Donegal**

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August 2017

## 1 Introduction

In support of this submission, an appraisal the potential impact of the re-zoning of the subject lands on Natura 2000 sites has been undertaken based on a comprehensive desktop study of the available information regarding the subject land.

## 2 Description of the existing environment

The proposed re-zoning of the subject land cover an area of 12.8km<sup>2</sup>, south-west of Ballyboffey (see Figure 1). The majority of the lands are located within an upland area reaching an elevation of approximately 400m AOD at Croaghbrack Hill to the south of the subject lands. Other hills within the subject lands include the hills of Garranbane (306m AOD) and Pollakeeran Hill (370m). There are very few residences in this very rural area.



Figure 1 Location and extent of subject Lands and aerial view (Bing)

### *Land cover*

The landcover (see aerial photo in Fig. 1) of within the subject lands comprises mainly of coniferous forestry, upland/mountain blanket bog and grass and scrub land, with some agricultural fields to the north of the subject lands near the Finn Valley. Within the wider landscape, forestry, agriculture, peat bog and renewable energy (wind farms) also comprise the main land-uses.

### *Soil and geology*

The subsoil is principally metamorphic till and sand/gravel pockets which is covered mainly by the following soil associations: peat soils and exposed rocks. There is a small area of fine loamy over shale and slate bedrock in the northern part (see Figure 2).

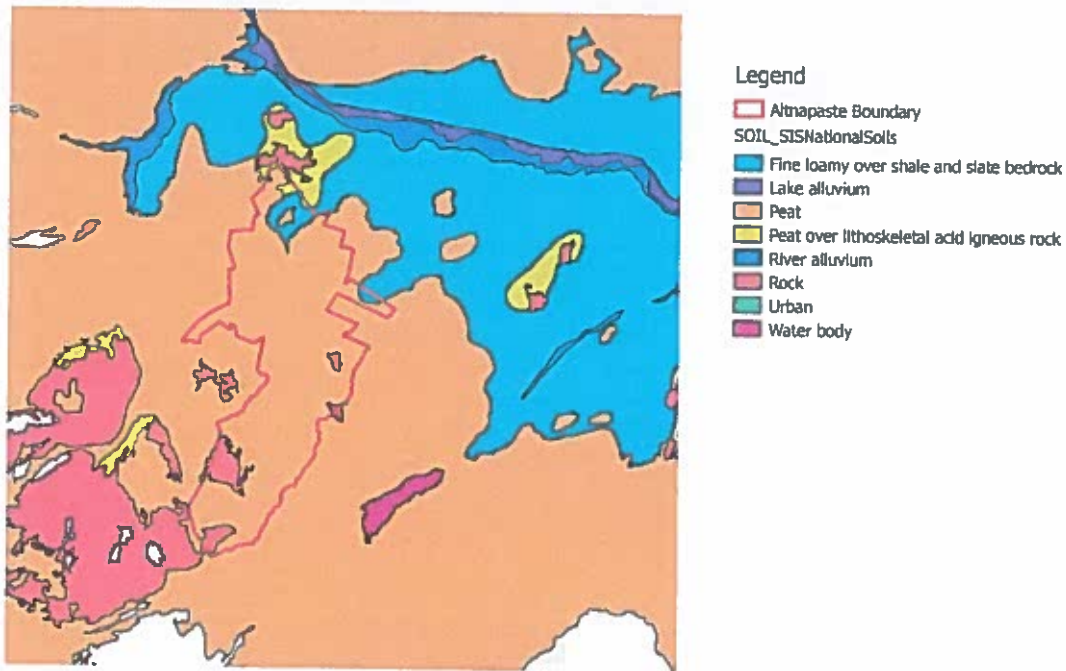


Figure 2: Soil associations (SIS national soils) within subject lands.

### Hydrology

The subject lands include several secondary streams which are tributary to the Finn River which is located 1.5km north at its closest location. The subject lands follows the contour or several catchments, bordering the Rough burn to the east and Clogher burn to the south. It also includes two loughs: Doo and Sallagh with two smaller ones: Lilly and Assoge (see Figure 3).



Figure 3: Streams and lakes within the subject lands and vicinity.

### 3 Identification of relevant Natura 2000 sites, and compilation of information on their qualifying interests and conservation objectives

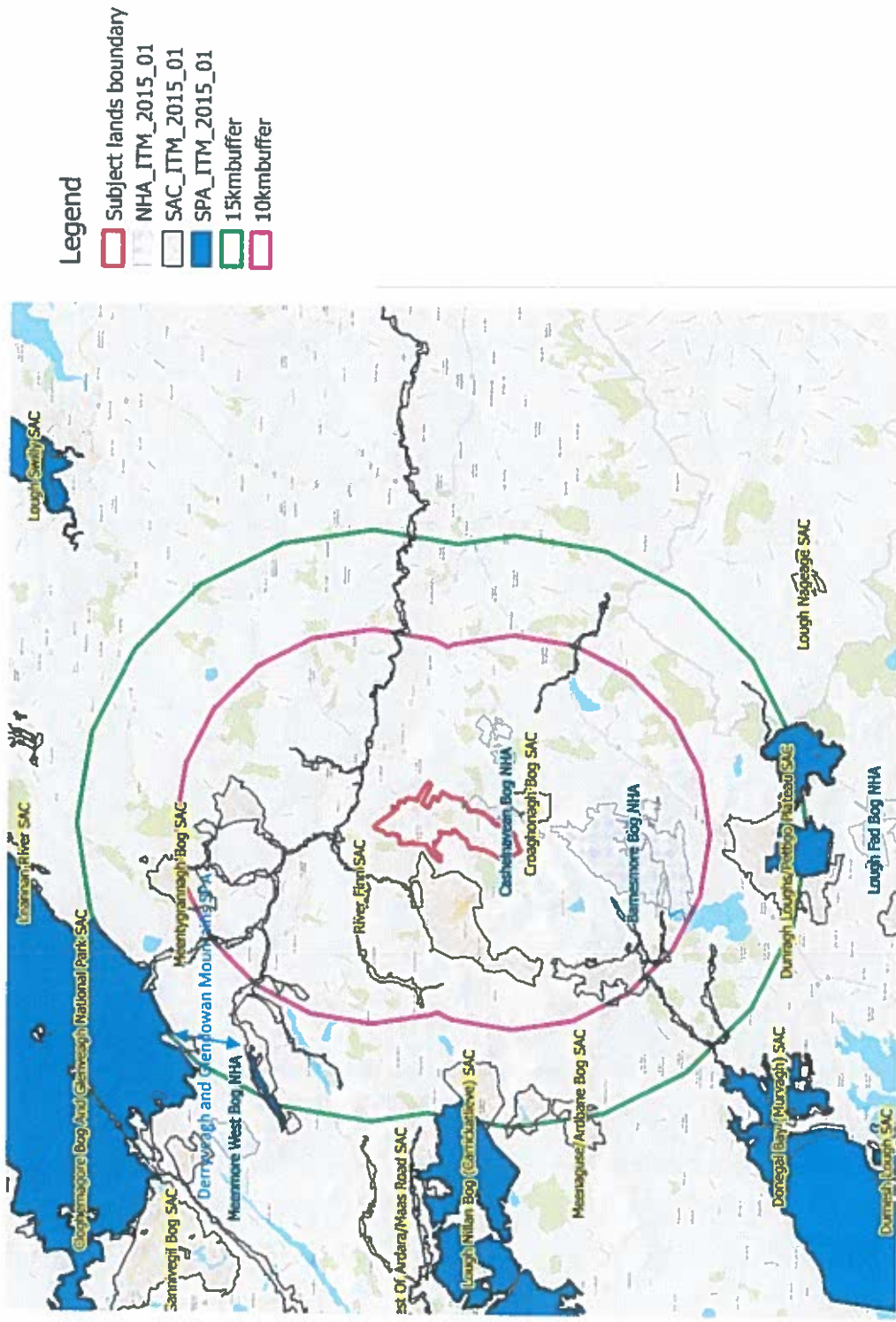
Using aerial photography and databases held online at [www.npws.ie](http://www.npws.ie), a list of all Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) located within a 10 and 15 km radius of the subject lands has been compiled (see Figure 4). Table 1 outlines all the Natura 2000 sites within the 15 km radius together with their qualifying features and distance from the site.

**Table 1: Natura 2000 sites that are within a 15 km radius of the subject land**

Site Code	Site Name	Distance from the site	Qualifying feature(s)
000122	Cashelnavean Bog NHA	Adjoining	This site consists primarily of upland blanket bog, wet heath, re-vegetated cutover bog, wet quaking areas and an in-filling lake, forming part of the catchment area for the Sruhanderg River that drains into Lough Mourne, east of the site after crossing the N15 at Red Burn Bridge. A second, smaller stream drains the northern portion of the bog into Lough Sallagh.
000129	Croaghonagh Bog SAC	1km east	This is a good example of active upland blanket bog, a priority habitat (7130) listed in EU Habitats Directive with some wet heath and cutover areas located throughout but mostly on the south/ south-eastern sides. Lake Carn and associated watercourses are tributaries to the River Finn. Bird species recorded from the site include Greenland White-fronted Goose and Merlin, both listed in Annex I, EU Birds Directive. The site is of very high conservation value and is actively managed in this regard by Coillte as part of an EU-LIFE funded project. It has been partly damaged in the past by forest drainage, and turf cutting is still present. Water abstraction from Lough Mourne may also have an impact on the hydrology of the site.
002301	River Finn SAC	1.2km north at the closest	Comprises mainly freshwater element (the River Finn and its tributaries) and blanket bogs with wet grassland being another major habitat. The Finn system is one of Ireland's premier salmon waters and is important in an international context in that its populations of spring salmon appear to be stable while declining in many areas of Ireland and Europe.

002452	Lough Hill Bog NHA	1.5km north-east	The site is principally upland blanket bog, located on the broad hill top known as Lough Hill, which slopes gently westwards to the shores of Lough Mourne and southwards to the Mourne Beg River (altitude ranges from 190-221m).
002437	Meenagarranroe bog NHA	3.6km north-east	Upland blanket bog site at an altitude that ranges from 175-204 m with particularly intact and active blanket bog habitats.
002375	Barnesmore Bog NHA	1.9km south	This site is a complex mosaic of upland blanket bog, wet heath and flushes, occurring at an altitude that ranges from 150-450 m. The western part of the site is drained by tributaries of the Lowerymore River. The site is of high conservation value.
000163	Lough Eske and Ardnamona Wood SAC	6.5km south-west  Within the Eske catchment area (tributary is ~190 m)	This site is comprised of Lough Eske a soft-water oligotrophic lake (a habitat listed on Annex I of the EU Habitats Directive), which occupies a large glacial-scoured hollow. The overall site is of high quality and includes a wide variety of habitats and species, several of which are rare in Ireland. However, the site is primarily of considerable conservation significance due to the oligotrophic lake of good quality, which is notable for the presence of Arctic charr ( <i>Salvelinus alpinus</i> ), Atlantic salmon ( <i>Salmo salar</i> ) and a good population of Freshwater pearl mussel ( <i>Margaritifera margaritifera</i> ).
000173	Meentygrannagh Bog SAC	9.5km north	This site is located on a gently sloping hillside, stretching from the summits of Arbatt, Meenirroy and Altinierin Hills, eastwards to a small tributary of the Elatagh River. The site was selected for the area of blanket bogs as well as transition mires and alkaline fens.
001880	Meenagus Scragh SAC	10km west	
001125	Dunragh Loughs/Pettigo Plateau SAC & SPA	11km south	Located on the south side of Barnesmore Gap, this is an extensive complex of blanket bog, wet heaths, lakes and pools covering an area of low hills and broad basins.
004110	Lough Nillan Bog SAC	13km west	The centre of this site is Lough Anarget with wet heath as the main habitat of conservation interest.
004039	Derryveagh and Glendowan Mountains SPA	13 km north-west	This is an extensive upland site of high ornithological importance with five species listed on Annex I of the EU Birds Directive.

Figure 4: Proposed subject lands vis-à-vis Natura 2000 sites (SACs, SPAs and NHAs) within a 10 and 15km radius.



#### **4 Potential and significance of impacts on Natura 2000 sites**

The subject lands do not include or border any SACs or SPAs. Therefore, it will not have any direct impacts on the ecology of designated/high conservation value habitats or species for which SACs/SPAs have been designated. The only species of conservation value found within the 10K grid square (NPWS.ie) was the Globe Flower (*Trollius europaeus*) which was recorded in locations more than 2km from the subject lands and therefore will not impact on any identified species. The closest SPA is located just over 13km north-west and is part of Derryveagh and Glendowan Mountains SPA. However, the type of habitats found in the subject lands may be of significance to certain migratory species. The subject lands comprise upland blanket bog which, if intact is a priority habitat within the Habitats directive and therefore would need careful appraisal. The type of soils (mainly peat) signify that some developments may require further assessment in terms of stability. Similar, the presence of several streams tributary of an SAC would need careful assessment. The River Finn SAC (002103) has been designated mainly because of the freshwater habitats which are homes to protected species that include Atlantic Salmon, Otter and Freshwater Pearl mussel.

The aforementioned potential risks would necessarily be assessed as part of Environmental Impact Assessment and Appropriate Assessment processes undertaken under general planning legislation.

#### **5 Conclusion**

The subject lands are not located within a Natura 2000 and therefore it is anticipated that re-zoning of lands would not directly impact negatively on any Natura 2000 sites. However, site-level Appropriate Assessment will be required to determine all potential effects and ensure appropriate mitigation is applied in order to eliminate any negative effects on the integrity of Natura 2000 sites. EIA and AA processes must therefore be incorporated into the next steps as necessary, in order to appraise all potential impacts so that adequate mitigation measures can be proposed.



### Map Legend



Subject Lands



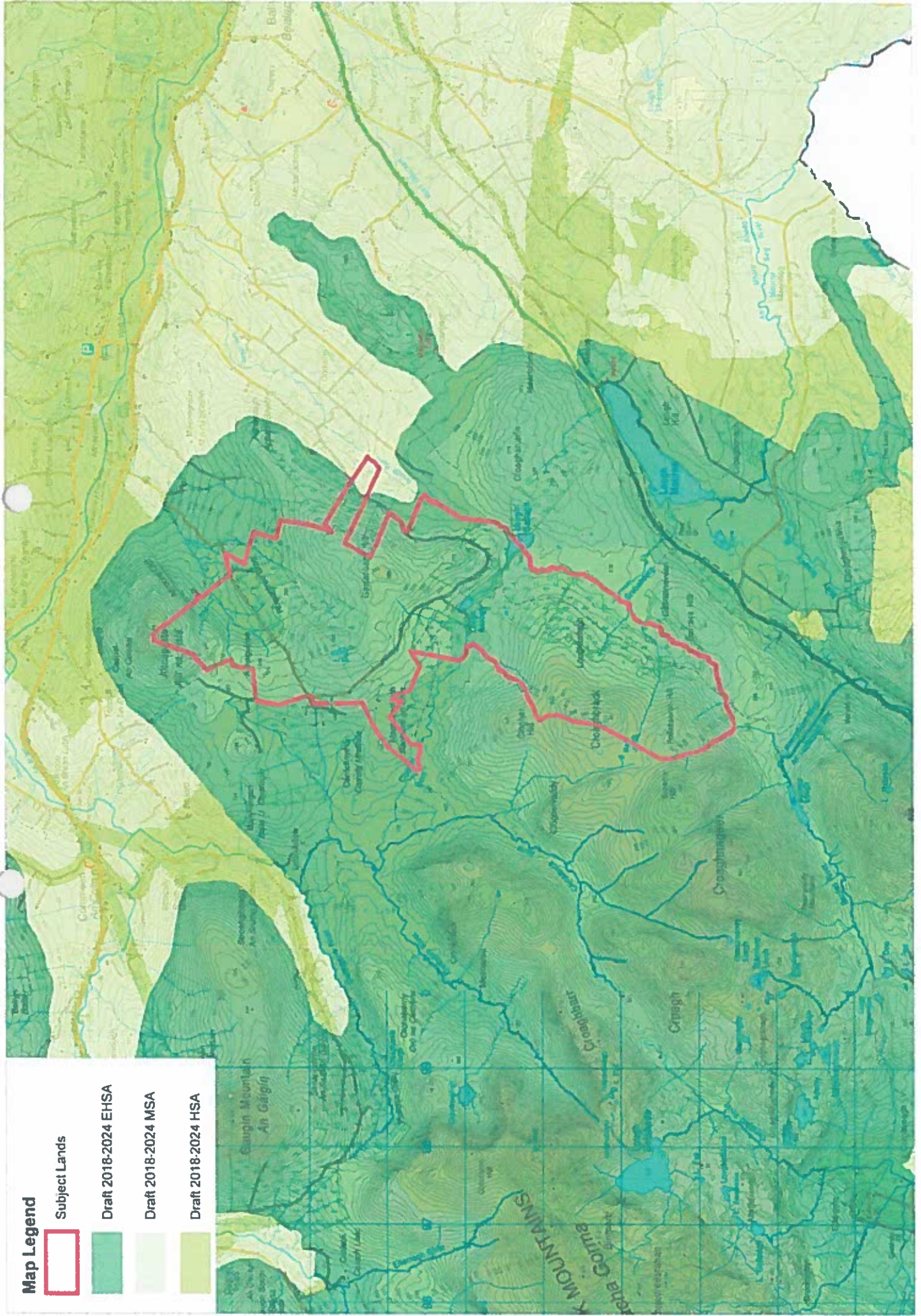
Draft 2018-2024 EHSA



Draft 2018-2024 MSA



Draft 2018-2024 HSA



**Map Legend**

-  Subject Lands
-  Draft CDP 2018 -2024 Open to Consideration
-  Draft CDP 2018-2024 Areas Not Acceptable

