

Finn Valley Wind Action

C/O Charlene McClintock

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Co. Donegal

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01 June 2022

Re; County Development Plan – Changes to Wind Energy Policy

Dear Planner,

Please accept our comments below on the policy changes Council propose to make on wind energy policies in the 2018 - 2024 County Development Plan and please kindly furnish us with an acknowledgement upon receipt.

Council will be well aware of the angst and division that the wind farm developments have caused in the Finn Valley over the past eight years since we first had [Redacted] [Redacted] come to the area to foist the 49 Carrickaduff turbines upon the community. The proposals caused huge anger in the Finn Valley area and beyond, as wind farm developments all over the country do.

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Windfarms are extremely divisive, fragmenting families and communities.

Of course, Carrickaduff became the smaller Meenbog proposal with the insertion of a 'ten times tip height' separation distance in our CDP in 2016 (by Variation). It was thus carried forward, without any Ministerial intervention, to the 2018 – 2024 plan until the beyond belief event of [Redacted] challenging the plan by Judicial Review in the High Court occurred. Sadly, Council did not defend their lawfully enacted plan and ten times tip height and other aspects of zoning with regard to wind turbines were struck from the plan late in 2018. Thus, this Variation, though belated, is wholeheartedly welcomed.

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In the interim we have had the Meenbog peat slide with catastrophic consequences for the Mourne Beg, Derg and Foyle river systems. As such that event focuses much of our comment on your Variation.

Wind Farms should not be considered in areas susceptible to peat slides. The disastrous Meenbog landslide was in a medium to low risk landslide susceptibility area yet this peat slide still occurred. The Cashelnavern LCA 40 has suffered greatly from this ecological disaster and therefore no further development of this type should be considered in this area.

Furthermore, having regard for what happened in Meenbog, We are particularly pleased to see all areas across the county with a recognised land slide susceptibility being marked out as '*Not Normally Permissible*'; for wind turbines, we do not want any more Meenbog events in our Donegal peatlands and uplands.

We would also point to the utter folly of placing any turbines at all on peatlands as they are recognised as being the main storage place for carbon. The Green Party have been caught up in an unseemly political debacle in recent weeks over domestic turf cutting. This brings to mind all the people up along Loch Mourne and out the Derg Line who cut turf to heat their homes. How come Mr Ryan would call to ban that yet allow Planree to excavate (by their own EIA admission) more than 390,000 cubic metres of bog to build a wind farm? How can Minister Malcolm Noonan this week, National Biodiversity Week, extend the Wild Atlantic LIFE project to Donegal and still Council countenance putting wind farms in bogs?

The nine-year LIFE conservation project is all about restoring our bogs to favourable status. The project recognises the carbon and biodiversity value of our bogs. Ireland contains eight per cent of the world's blanket bogs – by deduction Donegal and the western seaboard hold the vast majority of that. Thus, I applaud Council for adding landslide susceptibility as a key mitigator against the placement of turbines and note the requirement for any such project to have dedicated peat surveys.

However, a note of caution, will the Council commission and oversee such studies? The reality is the wind farm developers already carry out peat and hydrology analysis as part of their applications. They did so in Meenbog and basically it was a case of, no issues here; it's a fine site! Yet Finn Valley Wind Action commissioned two independent reports by [REDACTED] and [REDACTED] both of which raised huge question marks over the stability of the site and these were ignored by An Bord Pleanála.

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We are relieved to finally see the proposal to put ten times a turbines height separation from homes back into the County Development Plan. There are many reports from communities across Ireland and abroad about the ill effects on health from turbine noise, flicker and emission of inaudible electro magnetic frequencies. Ten times separation from today's massive, high power, turbines is well advised.

We are worried that as more and more wind farms go to An Bord we need a commitment from Council that they will robustly defend their Plan to An Bord Pleanála for every application that is appealed or sent by virtue of Strategic Infrastructure Development to them.

We note the effort being made to demonstrate to the Minister that Donegal is committed to renewable energy by supporting the repowering or upgrading of existing wind farms. We honestly believe that is the prudent avenue of development for Donegal. We have an abundance of turbines that are over twenty years old and barely fit to boil a kettle. These can be replaced, reduced in numbers hugely, and yet quadruple the output power. We would support that provision rather than see vast swathes of new ground tore up for turbines.

Lastly, in appreciating this Variation for finally seeking to lay some restraint on the blanket rollout of turbines in the county over the last two decades, We believe that we must wake up to the value of our unspoiled open landscapes and wonderful mountains. Donegal is becoming a 'tourist trap' and you will see no blogger or photographer saying they came to see the turbines. Hence, those exclusion zones for turbines in the EHSAs, Cashelnavern LCA 40, St John's Point and the rugged Gweebarra can only but be welcomed.

Thank you for considering our view and we look forward to seeing the Variation enacted and, indeed, carried forward to the 2024 – 2030 plan on which we note work has already commenced.

Charlene Mc Clintock