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VAT REG. No. 186028888

Wind Energy CDP Variation,
Central Planning Unit,
Donegal County Council
County House
Lifford
F93 Y622
1st June 2022

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

Dear Sir/madam

I refer to the publication of the above draft variation documents in respect of wind energy policy in the Donegal County Development Plan 2018-24. Overall, the draft variation is extremely disappointing and negative and amounts to a moratorium on commercial wind energy in County Donegal. With typical commercial wind turbines having a blade tip height of 150 metres, there is no possibility whatsoever of meeting the separation distances from residential properties within the areas designated as "Open to Consideration". The sparse area of the "Acceptable in Principle" designation, does not offer any real opportunity for wind energy development.

If this is the intention of the members of the Council, then I consider that it would be more honest to present a simple single policy, confirming that Donegal County Council will not facilitate commercial wind energy development, rather than presenting banalities, supporting alternative energy in face of the climate change threat.

My concerns in relation to the draft variation, can be summarised under the following general headings:-

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1. Failure to have regard to national/regional policy and Government planning guidelines.
2. Failure to to examine all criteria in reaching the evidence based policy framework and to follow proper procedure in relation to assessment of wind energy potential.
3. Failure to consider the implications on inward investment into County Donegal.

1. Failure to have regard to national and regional policy and Government planning guidelines.

Despite claiming that the draft policy has been prepared, having regard to national policy and Ministerial planning guidelines, this is clearly not the case.

In particular, it is noted that the members of the Council, overruled their own planning officials, by amending the separation distance between wind turbines and residential properties and other centres of human habitation from four times to ten times the tip height of proposed turbines. Ministerial guidelines have stipulated four times the blade tip height separation distance and under Section 28 of the Planning and Development Act, 2000, planning authorities **must** have regard to these guidelines in the performance of their functions.

Accordingly, the draft variation should confirm that the separation designation between wind turbines and residential properties and other centres of human habitation, does **not** have regard to Ministerial guidelines and is totally at variance with Specific Planning Policy Requirement 2, established under Section 28(1C) of the Planning and Development Act 2000, (as amended), that, in both their development planning and management functions, planning authorities shall not apply a setback distance that exceeds the four times the tip height separation requirement.

Furthermore, the draft wind energy policy variation does not comply with national/regional wind energy policy and it should confirm that the County Donegal wind energy policy, as set out in the draft variation, will **not** contribute to realising national/regional targets on

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renewable energy and climate change mitigation in accordance with Specific Planning Policy Requirement (SPPR 1), as claimed in the draft variation.

These facts should be clearly stated under the new Section 28 in the draft variation.

2. Failure to to examine all criteria in reaching the evidence based policy framework and to follow proper procedure in relation to assessment of wind energy.

The current Ministerial Wind Energy Guidelines 2006 (paragraph 3.5) and the emerging Ministerial Wind Energy Guidelines 2019 (paragraph 3.6) both set out a step by step approach to a sieve mapping analysis to be utilised by planning authorities of the key environmental, landscape and technical criteria, which **must** be balanced in order to identify the most suitable location for wind energy development. While the draft variation for wind energy policy, does clarify how the landscape character and sensitivity analysis was undertaken and identified the datasets on which the relevant areas were selected, it is respectfully considered that there were serious omissions of certain datasets. The restrictive and negative datasets used in the assessment, while relevant, did **not** provide for a balanced assessment. For example topographical data and wind speed information, both of which were specifically highlighted in the Ministerial guidelines, as datasets to be considered in identifying suitable locations for wind energy development, were ignored in the assessments. In addition, the use of the SEIA's Wind Atlas for Ireland, to assess areas of wind potential, was also not considered.

Furthermore and more importantly, no consideration was given to extant, or recently expired planning permissions for wind energy developments. It is difficult to comprehend how an assessment of suitable locations for wind energy developments, could ignore these planning permissions and lands immediately adjacent to them, for inclusion in the "Accepted in principle" designation. For example, two planning permissions in Inishowen fall into this category - Inishowengaoth Ltd (18/51230 & ABP305861-19) and Aught Wind Farm Ltd.

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(11/70191), which respectively expire in April 2031 and November 2023 are ignored in the assessment. There are other examples of extant planning permissions for wind energy projects, which have also been ignored.

It is considered incumbent on the planning executive and the Council members to include **all** extant wind energy developments and a substantial buffer around them, as areas “Acceptable in Principle” on Map 8.2.1 for wind energy development.

Finally it is noted that a detailed methodology with specific steps for landscape sensitivity mapping was outlined in Appendix 1 in each Ministerial guideline. The mandatory steps were never carried out and no evidence was presented in the draft variation, setting out how this methodology was followed. In terms of consultation under the methodology, wind energy companies were not included in discussions and assessments of the identification of suitable lands for wind energy development. These companies, while having a partial viewpoint on wind energy, nevertheless have accumulated a vast array of experience and knowledge of the the wind energy sector, which the Council should at least take into consideration.

3. Failure to consider the implications on inward investment into County Donegal and the role for Donegal in the German-Irish Green Hydrogen Council.

It is accepted that County Donegal, by virtue of its relative isolation in the northwest of Ireland and due to the hangover of the “troubles” on its border in Northern Ireland, has faced difficulties in attracting inward investment by international companies providing substantial employment opportunities.

It is also commonly acknowledged that most, if not all these international companies, pride themselves in their use of alternative energy, which forms a cornerstone of their ethos and philosophy.

Donegal has an abundance of wind, which if harnessed, can provide the county with sufficient wind resources and satisfy the alternative energy requirements of potential international companies. On the other hand, the draft variation on wind energy, if adopted,

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will ensure that there is a serious deficiency in alternative energy wind resources in County Donegal and that the county is “closed for business” in terms of alternative energy in the eyes of inward investment.

The assessment of the wind energy policy, as set out in the draft variation, was obviously oblivious to the German-Irish Green Hydrogen Council. Green hydrogen production in Ireland is a new and emerging industry and is seen as essential for Europe to achieve Net Zero emissions by 2050. Given the vast wind reserves in Ireland and particularly in Donegal, there is an opportunity to create an export industry to support the demand for green hydrogen in Germany and other parts of Europe. It is recognised that hydrogen produced and stored from renewable energy will play a significant role in the decarbonisation of many sectors and plans to use existing wind resources and future renewable growth, will emerge as a leading player in large scale renewable hydrogen production. Already other locations in Ireland are promoting themselves for a pilot project on the creation of green hydrogen, through wind energy.

Unfortunately, with the adoption of the draft wind energy variation, the members of Donegal County Council, are again placing County Donegal at the back of the queue, in terms of establishing a strong foothold in the production of and export of green hydrogen, through the development of commercial wind energy.

In conclusion, it is hoped that the Council will reconsider its negative position with respect to wind energy and that it is not left to the Department of Environment, Community and Local Government, or High Court judicial review, to ensure a proper and balanced variation to wind energy policy in County Donegal is adopted.

Personal Information redacted

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