

**STRABOY WIND FARM ORAL HEARING  
Glenties, Co Donegal**

**18/10/2012**

**REF: PL 05B.240166**

**P.A. 11/300127**

**Submission of Cllr. John Campbell.**

*Check against delivery*

## INTRODUCTION

My name is John Campbell and I am a member of Donegal County Council. I am also a teacher in the local second level school here in Glenties, St. Columba's Comprehensive. I have taught there for the last eight years and I over that time I've got to know the community of Glenties and its environs very well through both roles. As a teacher it has always struck me how close knit and vibrant the community here is, coming up to the tidy towns every year it's not uncommon to see a team of 20 or 30 people, young and old working around the town. If the local GAA team Naomh Conaill are playing an away match the town will be deserted. The people I have met in my time here display a great pride in the place where they are from; this is evident in the numerous sporting, music and arts events and clubs that are active in Glenties.

In my submission today I wish to address the following 4 points which leads me to the conclusion that planning for this development should be refused whether scrutinised against the previous or the present county development plan:

- 1) Socio-Economic impact of the development.
- 2) The inadequacy of:
  - i) reinstatement plan and associated securities,
  - ii) roads security.
- 3) Potential adverse health impact on students in St. Columba's Comprehensive School.
- 4) Miscellaneous Clarifications & Questions

### POINT 1 (Socio-Economic)

The factor that most effects the socio-economic profile of a rural area like Glenties is job creation. The county development plan acknowledges both wind energy and tourism for potential job creation and includes policies designed to enhance this potential. The plan does not place more importance on any one set of policies over the other.

#### **Let us look at both industries in relation to Glenties:**

- Most jobs created in Glenties by the Straboy wind farm will be one off short term jobs in construction.

- Based on the IWEA commissioned report compiled by Deloitte - Jobs and Investment in Irish Wind Energy(2009), County Donegal can expect to generate 22 wind energy related jobs in operation/maintenance category between now and 2020. Straboy will be responsible for 2.8 of these.
- They will be the only potentially sustainable jobs created by the Straboy wind farm.
- As there is no community dividend involved in this project most of the profits will leave the area, save the landowners that are involved.
- Tourism already creates 68 jobs in the area as stated yesterday by Mr. O'Neill in his presentation on the subject.
- His figures came from the census which was taken in April 2011 before the high season starts. I think it is reasonable to assume therefore that these are permanent jobs and would be supplemented by part time summer jobs also.
- The €4m plus investment in the Sliabh Liag tourism project will, according to Donegal County Council, double visitor numbers to the attractions to over 250,000. Glenties/Ardara are uniquely poised to gain from this as the natural gateway for visitors to explore the rest of the County.
- Jobs created in the Tourism/Leisure industry while not usually the best paid, they are local and they are sustainable.

**My considered view is:**

These are not industries that complement each other due to the rugged, unspoilt nature of the terrain being the USP of Donegal tourism. They can not happily coexist, and therefore in considering each wind energy application a choice must be made. Which is the most beneficial for the area and for the county as a whole should be the deciding factor. Along

with being a significant current employing industry, tourism also holds much more job creation potential for Glenties than wind farm development does.

These locally based tourism jobs allow people to remain in the area, a factor that I have found in my time teaching in Glenties to be more important to the people of this community than wealth.

The additional summer employment allows 3<sup>rd</sup> level students an opportunity to return and find work during their holidays. A factor that I think has a positive influence on the strong community spirit that exists here.

#### POINT 2 (Inadequacy of security/EIS decommissioning plan)

I would now like to turn to planning conditions 18 applied by Donegal County Council in the Manager's Order Manager's Order No: 2012PG0020.

18. Before any part of the development herein approved is commenced the developer shall provide adequate security to the Council for provision and completion of all services required by the development and to secure the satisfactory reinstatement of the site upon cessation of the project, in the form of:

- (a) A Bond of a Banking or Insurance Company acceptable to the Council in an approved form; or
- (b) A Cash Deposit; or
- (c) Such other security as the Council may approve -  
in the sum of €420,000.

Reason: To ensure satisfactory completion of the development.

#### **My considered view is:**

- The figure of €420,000 is intended to cover two things:
  - provision and completion of all services required by the development;
  - secure the satisfactory reinstatement of the site upon cessation.

My concern is the adequacy of the figures, particularly when the cost of decommissioning is taken into account. Are these sums adequate? What is the basis for calculating the decommissioning costs?

- In the current financial climate, how secure is the institution providing such a bond?
- A cash deposit brings certainty.
- “Such other security as the Council may approve” is entirely vague and lacks all certainty.

I would now like to turn to planning conditions 19 applied by Donegal County Council in the Manager’s Order Manager's Order No: 2012PG0020.

19. Before any part of the development herein approved is commenced the developer shall provide adequate security to the Council for potential damage to the local road and bridge network as a result of the development hereby permitted, in the form of:

- (a) A Bond of a Banking or Insurance Company acceptable to the Council in an approved form; or
- (b) A Cash Deposit; or
- (c) Such other security as the Council may approve -  
in the sum of €80,000.

Reason: To ensure satisfactory completion of the development.

**My considered view is:**

My concerns are the same in this case as in the previous one, but I wish to qualify my reservations about the adequacy of the security demand made.

- As an example Donegal County Council Roads Dept. estimated the cost of restoration work on a 700m stretch of the L-1515-3 at €2,500. A 500m stretch of regional road (R263) cost €45,000. On this basis the security asked for would repair very little potential damage.

(The roads programme 2012 should be available on the council website for verification of figures)

- Again it is the local community that suffers if a measure such as condition 19 fails.
- The council planners indicated yesterday that they would be open to considering lifting the restrictions on use of local roads laid down in condition 13. A position that the developer signalled his intent to pursue.
- Is the likely impact of this potential change analysed adequately in the applicants EIS?

### POINT 3 (Adverse Health Impacts)

Having heard the testimony of Dr. Christopher Hanning and Dick Bowdler in relation to the impacts that noise generated by these turbines can have, I wish to add my own concern specifically in relation to St. Columba's Comprehensive School were I teach. A school that has built a strong reputation for its accommodation of children with special educational needs.

- There are over 380 pupils attending the school
- It is situated less than 2km from the proposed wind farm site.
- Presently there are over 100 students availing of the SEN service in the school
- Of these 8 have ADHD, 5 are assessed as being on the Autistic spectrum.

#### **My considered view is:**

I welcome the Councils Planners acknowledgement in their statement yesterday that there may be adverse health effects associated with wind farms (2.2.4 pg 17-18) Although I would be of the opinion that in the interim we should err on the side of caution regarding set back distances, not carry on regardless as suggested by planners due to the lack of a policy or guideline. It reminds me of 'big tobacco' who espoused the 'carry on regardless, there is no conclusive evidence' line to the detriment of the people using their product.

POINT 4 (Miscellaneous Clarifications & Questions)

As a public representative on Donegal County Council I do not have direct role in the planning process outside of setting policy. I would appreciate if I could seek clarification on a number of issues, some of which although of a broader planning nature I believe are pertinent to this application:

- I have observed that wind farm developments in Donegal have without exception required extensive Further Information Requests. It is the case with this application also. This despite the 1<sup>st</sup> party consultant's obvious and stated experience in the preparation of EIS reports. While I acknowledge that the EIS is a complicated and site specific document, I refer to guidance available in the IWEA's:

**Best Practice Guidelines for the Irish Wind Energy Industry.**

**Chapters:                    3.2 – Pre-planning Meeting**

**6.3 – Main aspects of EIS**

Can it be explained to me why this is so?

- Again with reference to the IWEA document, Best Practice Guidelines for the Irish Wind Energy Industry specifically Chapter 11 – Community Engagement. Although no mandatory the industry itself sets out compelling merits for it.

What was the developer's rational in not conducting public consultation in this instance?

In the County Donegal Development Plan 2012-2018, Chapter 10 Development & Technical Standards. 10.6.5 states:

‘Wind turbines must meet the requirements and standards set out in the DEHLG Wind Energy Development Guidelines 2006, or any subsequent related Guidelines and in addition must not be located within:

- (a) The zone of visual influence (ZVI) of the Glenveagh National Park
- (b) The zone of influence/ flight path at Donegal Airport.

It is my considered opinion that the 2010 document issued by the European Commission entitled – Wind energy developments and Natura 2000, would fall into the category described as ‘subsequent related guidelines’ and should be considered in the context of this appeal.

Thank you.

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