

**Public Oral Hearing
An Bord Pleanála
Glenties, Co. Donegal
16-23 October 2012**

Appeal against Straboy Wind Energy Ltd.

Proposal for:

Erection of 25 no. Wind turbines, of 64 meter hub height and with 71 meter rotor diameter, 4.0 of metre wide trackways, four borrow pits, a substation, a mini-substation, peat disposal areas, clear-cutting of conifer plantation, and associated site development works.

Location:

Straboy, Meenalargan, Loughcrillen, Mulnamin Beg, Derk Beg,
Derryloughan, Glenties, Co Donegal

My name is Ralph Sheppard. I am a retired ecologist. After lecturing for eight years, I earned my living as an independent consultant for over 30 years. During that time I worked on Environmental Impact Statements for about 20 wind farms, trying to minimize their impact on the natural environment. I also declined invitations to work on almost as many more, on the grounds that no amount of damage limitation would have made those projects acceptable.

My comments relate to the documentation and submissions already produced by various agencies and individuals.

I start with the general observation that the statements on the natural environment from Atkins, and from Richard Nairn, both put their focus on the top layer of conservation concern – the designated sites in the area, and the red-listed species on the site. This approach is inadequate. Red-listed species, and Annexed habitats are those which are most threatened. They of course need major consideration. But if we consider only them, then species and habitats of lower threat ranking are ignored, and soon rise to the top rank. We seem to have drifted in Ireland into abandoning any concern for land not designated, and species not red-listed. So although Atkins rates the Straboy site as of National conservation importance, the conclusion is to proceed with a development that will effectively destroy it.

Habitats

They have identified 12 Natura 2000 sites within 10km (Nairn p2). I would like to point out that this is an extraordinarily high number of sites for such a small area, and demonstrates that this proposed development is set in a very important landscape. Site designation for SACs selects the most important examples of each habitat type that is threatened in Europe as a whole, so we can assume that where the density is high, there are other sites between those that have been selected, which fall just below the standard, but which by any other reckoning are good examples of the type.

This is certainly the case with Straboy. The EIS states that the majority of the site is upland blanket bog and wet heath – both Annex 1 habitat types in the European Habitats Directive. These habitats are acknowledged as of National Importance. The EIS also acknowledges that some of the habitat is eroded, but does not mention that this is normally the case with upland bog, particularly on exposed ridges and cols. In this case much of the erosion is reversible, and already in a condition of vegetative re-growth (Section 3.1.1). Where there is evidence that the bog has been cut-over, the EIS acknowledges that in the habitats guidelines, the currently functioning habitat is the one to be recorded. So where cut-over bog has started to heal itself and is once again functioning as active blanket bog, then it *is* blanket bog, and not cut-over or degraded bog. So the vast bulk of the site is occupied by Annex 1 habitats. I can't fault Atkins in the overall evaluation of the site as being of National Importance. But how this can then justify it being carved up by access roads and turbine sites? There is no doubt that the site will no longer be of national importance once a windfarm is installed.

What the EIS fails to do is admit that the small total acreage to be damaged is far less relevant than the fact that the site will be fragmented into numerous small packages. Each of these will have fresh exposed edges, so there can be no doubt that the bog will in time dry out. Also species that prefer their bogs to be large, will not take kindly to having to choose between many small boglets. This will apply to large species like eagles, and to the tiny invertebrates that will choose not to move across dividing tracks, and become isolated on their small bog packages. This is a recipe for a series of local extinctions leading ultimately to complete extinction on the site

Golden Eagles

Nairn emphasises that Golden Eagles are not likely to suffer collisions, and concludes that they are not likely to approach the site once the turbines are erected. But just in case, he recommends that no measures should be taken to enhance the populations of suitable prey species to attract them – having already claimed that prey species populations are low.

So on the one hand, he is reassuring us that the rare and threatened Red Grouse is not going to be affected by the wind farm – and on the other hand, he advises that no measure should be taken to help the grouse – just in case the odd eagle might stray into the site.

It is a long-established fact that eagles do not threaten Red Grouse, as they tend to kill surplus birds that do not have breeding territories. But in any case, Eagles will only target grouse if there is a healthy population. So the fortunes of the two species go hand in hand, and the aim of the developers here is to suppress both.

To have a high quality environment it is not sufficient to protect only high quality sites.

Bog Orchid

Bog Orchid is mentioned as having been recorded in the 10km square, and that it is possible that it is present on the site. I am familiar with the species, and can confirm that as well as being extremely rare; it is extremely hard to find even where it exists. I have searched for it in all other possible sites in this 10km square, without success, and this site is the only likely contender left. But to be quite sure that this elusive species is not present, it would probably take a week of intensive work in its flowering season.

Water Quality

“The Natural Impact Statement concluded that, when water quality mitigation is fully implemented, significant impacts on the integrity of the West of Ardara / Maas Road Special Area of Conservation will be highly unlikely.” Nairn p3

I would emphasise When. There is a pattern in County Council planning permissions whereby controversial applications are granted permission with a string of conditions. But there is no capacity in Donegal for monitoring planning applications, or ensuring that conditions are adhered to. Often the conditions are so stringent that it is hard to see how they could be implemented. But that doesn't seem to matter. Once granted, it is taken on trust that the developers will fully comply, but in my experience, they seldom do. There is no reason to suppose that they will in this case.

Mary Boothman of the Tourism dept points out that while the EIS states that *'it is likely that there will be a significant negative impact at the Local Scale to tributaries of the Shallogan and Stracashel River as a result of run-off laden with suspended solids'*, the Appropriate Assessment views this impact as *'not significant'*. This is another way in which Environmental Impact Statements have to be treated with caution. It is very easy for one part of the team to accurately describe a situation, and for another part to put a gloss on the interpretation.

The EIS emphasises the small total acreage that will be disrupted, and the temporary nature of the disruption to the peatlands and their hydrology during the construction phase. This is again slight of hand. They are quite accurate in their description of the effects and their impact. They say “Studies that have investigated the drying effects of drains on bogs have largely focused on raised bogs over deep peat. The extent of drying in upland blanket bog with heterogeneous peat depth and variation in slope is unclear. Nevertheless, it appears that impacts on the peatland habitat resulting in changes in the sites hydrology will be Significant negative at the Local scale” (Section 2.182). These comments do not square with claims that the damage level will be acceptable.

Merlins

The Merlin is not mentioned, other than as a species for which nearby Special Protection Areas have been designated to help conserve. But it is present on the Straboy site. This is one of that small groups of charismatic upland species that

count as much more than just another species. It is an Annex 1 species with an estimated population in Ireland of only 110-130 pairs, and a decline of 35.5% in the number of occupied 10km squares between the two breeding atlases (Gibbons 1993). And early indications from the recent third atlas survey are of at least short term declines (Caffrey pers. comm.). If it fails on technical grounds to tick the same boxes as Golden Eagle or Red Grouse, it is in my opinion, and I would hope that of most people, every bit as deserving of our concern and consideration. Merlin is a predator that hunts at high speed over open country without obstacles. It is unlikely to remain in the vicinity of 25 turbines.

Conclusion

I return to where I started. Where is the logic in putting such effort into evaluating a site to be of national importance for conservation, and then deciding to proceed with a proposal that will destroy it? If An Bord Pleanála follows this logic, it can only be on the grounds that windpower is the flavour of the moment, and that the wish of the government to double the number of wind farms overrides good planning. So I must stray from my brief and finish with some observations from a lifetime of working to protect not only local wildlife and habitats, but also a planet that can continue to support all that, and humans too.

Renewable energy is not only desirable, but also absolutely essential - not just as an alternative to fossil fuel, but as a replacement. But in our haste to respond to international obligations to do just that, we have lost sight of the fact that it is also necessary to *reduce* our total energy demand, and the general impact on the planet that more industrial activity and economic growth inevitably generates. We won't do that with wind power. Wind energy must be backed up with additional non-erratic power that comes into play when the wind is not blowing. And that usually means electricity generated by fossil fuels. But you can't leave a new power station idle and just switch it on when the wind drops. It has to run all the time. So we use more energy, just to be able to use the wind turbines at all.

And do we consider where we should be placing the wind farms? There are far more potential turbine sites on the flat midland plain than on the relatively few acceptable hilltops. But ringing the Donegal hills with a new high voltage power line has spawned a spate of wind farm proposals for sites far better suited to sustaining a local environment fit for a sustainable tourist industry, and a sustainable life-style for the local population.

Ralph Sheppard
23 October 2012