DERREENACRINNIG WEST WIND FARM

APPLICATION FOR SUBSTITUTE CONSENT UNDER S177E OF THE PLANNING AND DEVELOPMENT ACT 2000 [AS AMENDED] ABP-REF-302837-18

20kV GRID CONNECTION TO CONNECT THE PREVIOUSLY CONSENTED DERREENACRINNIG WEST WIND FARM, DRIMOLEAGUE, COUNTY CORK TO THE NATIONAL GRID

PLANNING REPORT

June 2019

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DOCUMENT APPROVAL

PROJECT	Application for Substitute Consent Under S177e of the Planning and Development Act 2000 [As Amended] Abp-Ref-302837-18 20kv Grid Connection to Connect the Previously Consented Derreenacrinnig West Wind Farm, Drimoleague, County Cork to the National Grid	
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1.0 INTRODUCTION

An application for Substitute Consent under Section 177E of the Planning and Development Act 2000[As Amended] is being sought by ESB Networks [ESBN] to regularise planning permission for a partially built grid connection to connect the already consented Derreenacrinnig West Wind Farm to the existing Ballylicky substation in Co. Cork.

1.1 Planning History and Background to the Project Proposals

A planning application was submitted by George O'Mahony for a 10 year planning permission for development of a wind farm comprising seven number wind turbines with a hub height of 55 metres and a rotor diameter of 52 metres, an electrical compound, sub-station building, four number car parking spaces, associated site roads and site works.

A decision to grant permission was issued in October 2011 by Cork County Council under planning reference 10/857 for a wind farm, comprising 7 wind turbines, an electrical compound and sub-station and all related electrical equipment, subject to 29 conditions. The planning permission was appealed by third parties to An Bord Pleanála who subsequently upheld the grant of planning permission on 05th December 2012, subject to 16 conditions under An Bord Pleanála PL88.239767 Decision.

Following the grant of planning permission, the wind farm developer received a connection offer from ESB Networks in 2014. This connection was accepted as a non-contestable offer which means that the wind farm developers agree that the works would be carried out by the applicant, ESB Networks. ESB subsequently commenced works on the Grid Connection as part of the Overhead Line [OHL] and Under Ground Connection [UGC]. Work to the Grid Connection commenced in October 2017.

Prior to the construction of the grid connection, ESBI carried out an Exempted Development Screening Study for ESBN of the proposed grid connection, to determine whether or not it would fall within the planning exemptions available for such development.

The planning permission for the consented Derreenacrinnig West Wind Farm was implemented, and work commenced on site on the 28th August 2017. All pre-commencement conditions relating to the wind farm have been discharged. Civil works at the wind farm site

are well advanced although there is no activity at present. Works to the grid connection commenced in October 2017.

1.2 Planning Application Reference 19/0010

A planning application for the construction of the unbuilt grid connection was submitted to Cork County Council in January 2019 under planning application reference 19/10 and is pending consideration. That planning application is for the "*installation of approximately 3.2km of underground cable ducting and associated electrical cabling, approximately 1.2km* of overhead line …*The works, which will take place at separate locations along the 14km grid connection route, are required to completed the grid connection from Derreenacrinnig West Windfarm to the ESB Ballylickey substation."*

2.0 APPLICATION FOR SUBSTITUTE CONSENT

The proposals now before the determining authority seek to retain 5 sections of the partially constructed grid connection which consists of overhead lines [OHL] as shown on Drawing No. 4636-P-GCR-00-1.1. The overall status of the grid connection is as follows:

- OHL already constructed – 9.7 km
- OHL to be constructed 1.2 km
- UGC to be constructed 3.2 km

As ESB Networks has responsibility for constructing the grid connection, construction of the line is well advanced and this application for Substitute Consent has been submitted to An Bord Pleanála under Section 177E of the Planning and Development (Amendment) Act 2010 to regularise the partially constructed Grid Connection.

Substitute consent is sought only for the existing grid connection works only. Accordingly, "the project" comprises the permitted turbine and on-site infrastructure development ("the permitted development") and the proposed grid connection development and the existing gird connection.

As set out above, the wind farm grid connection consists of a 20kV Electrical Connection (13.916km), of which, 10.738 km is 20kV overhead line (OHL) mounted on single wooden pole sets and 3.178 km is ducted underground power cable in 6 separate locations, so as to

connect the Derreenacrinnig West Wind Farm to the existing Ballylicky Substation. The extent of the substitute consent application "the existing grid connection" is show in **Figure 1.2**.

The grid connection consists of a linear site running in an east to west direction as shown in **Figure 1.1**. A remedial EIAR is submitted in support of the substitute consent application. Where reference is made to both the proposed wind farm development and the grid connection together in the remedial EIAR, the term 'project' will be used.

Route Description – Constructed Overhead Line [OHL]

Five separate sections of the overhead line [OHL] portion of the grid connection route have been constructed to date.

Table 1: Existing Grid Connection

Area 1	Comprises 408 metres of Overhead Lines.
Area 2	Comprises 619 metres of Overhead Lines.
Area 3	Comprises 4.565 km of Overhead Lines.
Area 4	Comprises 829 metres of Overhead Lines.
Area 5	Comprises 3.115 km of Overhead Lines.

The largest constructed section comprises the central portion of the grid connection route between the townlands of Gortnacowly to the east and Skahanagh More to the west. The second longest constructed section is the most westerly portion of the entire grid connection route, between the Derreenacrinnig West Wind Farm substation and the western portion of Barnagowlane townland. Three shorter sections of the overhead circuit have also been constructed along the grid connection route. There are two short sections at the western end of the route, the more easterly of the two short sections extends across a portion of the townlands of Shandrum More and Dromloughlin, while the more westerly section extends between Dromloughlin and the northeast corner of Ballylicky 110 kV substation. The other short section of constructed OHC is located near the central portion of the route, extending between the townlands of Glanareagh and Ardsbeg. The combined length of the constructed sections of the OHC measures 9.537km.

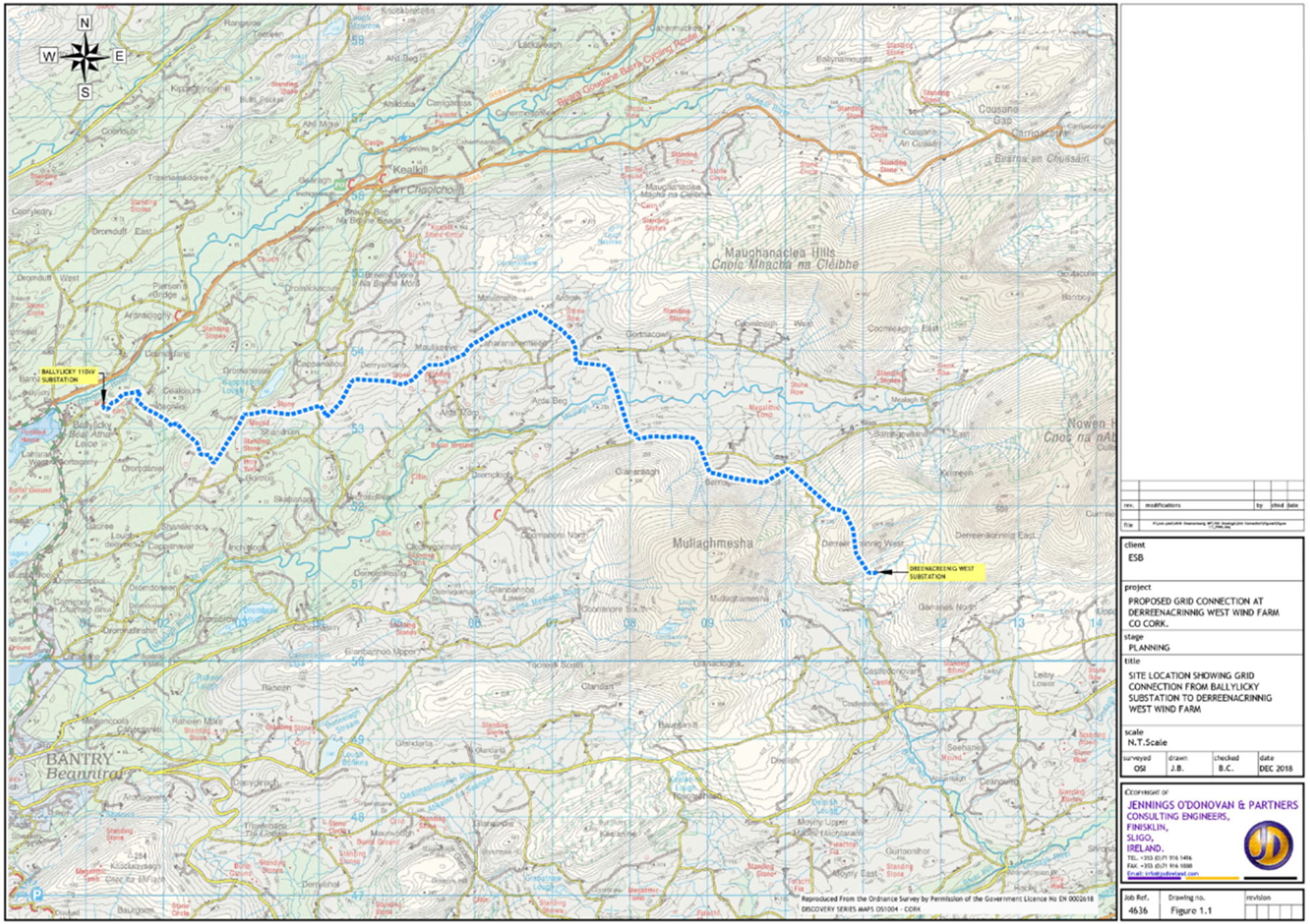


Figure 1.1 Site Location showing Grid Connection from Ballylicky Substation to Derreenacrinnig West Wind Farm

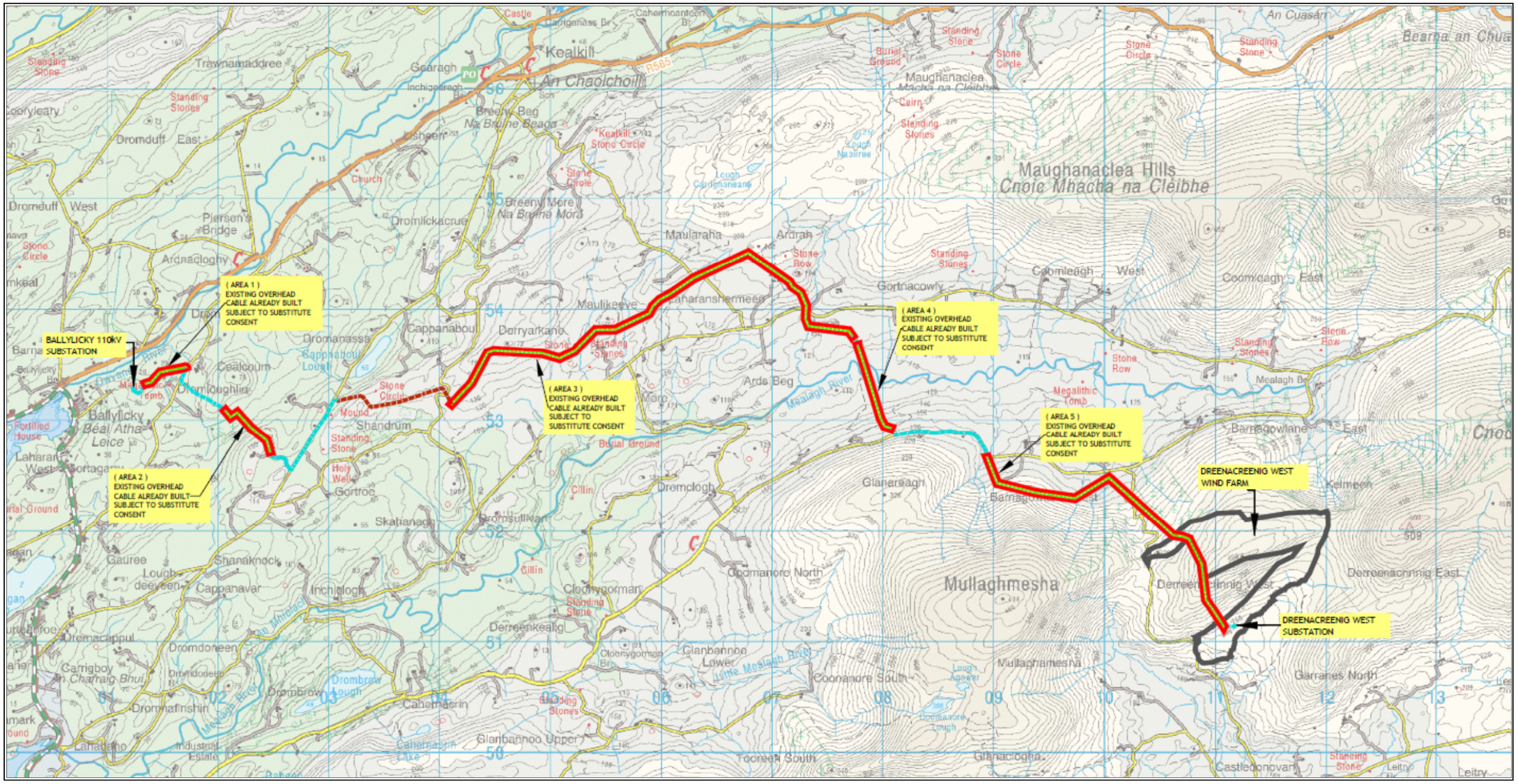
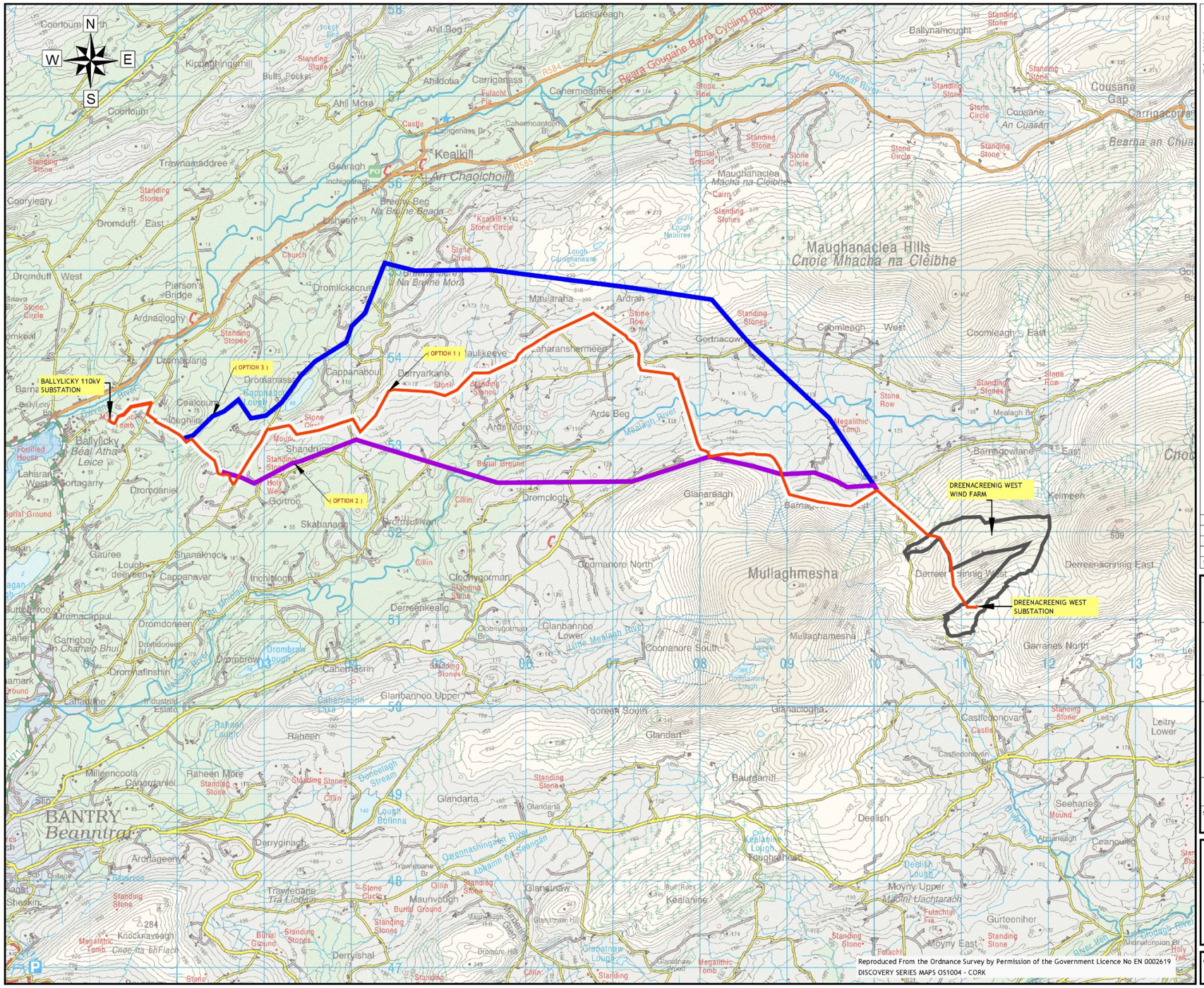


Figure 1.2 Site Location Plan showing the existing overhead grid connection



Notes

1. FIGURED DIMENSIONS ONLY TO BE TAKEN FROM THIS DRAWING.
2. ALL DRAWINGS TO BE CHECKED BY THE CONTRACTOR ON SITE.
3. ENGINEER TO BE INFORMED OF ANY DISCREPANCIES BEFORE ANY WORK COMMENCES.
4. ALL LEVELS REFER TO ORDNANCE DATUM (MALIN HEAD).
5. THE GRID CONNECTION PLANNING APPLICATION BOUNDARY (SOLID RED LINE) SHOWS THE FULL EXTENT OF THE GRID CONNECTION BETWEEN DREENACREENIG WEST WINDFARM AND BALLYLICKY 110 KV SUBSTATION. WITHIN THAT RED LINE, SEVEN SEPARATE LOCATIONS ARE THE SUBJECT OF THIS PLANNING APPLICATION TO CORK COUNTY COUNCIL (THESE ARE LABELLED AS AREA 1, 2, 3, 4, 5, 6 AND 7). THE REMAINING AREAS WITHIN THE RED LINE ARE THE SUBJECT OF AN APPLICATION FOR LEAVE TO APPLY FOR SUBSTITUTE CONSENT TO AN BORD PLEANÁLA REFERENCE 302837-18. THE GRID CONNECTION PLANNING APPLICATION BOUNDARY ENCOMPASSING BOTH THE APPLICATIONS, TO CORK COUNTY COUNCIL AND AN BORD PLEANÁLA, IS BEING SHOWN WITHIN ONE SOLID RED LINE SO AS TO GIVE A FULL UNDERSTANDING TO THE PUBLIC OF THE PLANNING STATUS OF ALL ASPECTS OF THE GRID CONNECTION.

LEGEND:

(OPTION 1)
(OPTION 2)
(OPTION 3)
Windfarm Boundary

rev.	modifications	by	chkd	date
file	P:\Jod-jobs\4636 Dreenacreenig WF\700 Drawings\Grid Connection\LINE ROUTE OPTIONS 2019\4636-GCR-OPTIONS-001_FIGURE 2.1 .dwg			

client
ESB

project
PROPOSED GRID CONNECTION AT DERREENACRINNIG WEST WIND FARM CO CORK.

stage
PLANNING

title
FIGURE 2.1
SITE LOCATION MAP
GRID CONNECTION ROUTE
LINE ROUTE OPTIONS

scale
1:20,000 @ A1

surveyed	drawn	checked	date
OSI	J.B.	B.C.	APRIL 2019

drawing no.	revision
4636-GCR-OPTIONS-001	

Figure 2. 1 Site Location Plan showing the Grid Connection Options

3.0 CONSIDERATION OF ALTERNATIVES GRID CONNECTION ROUTES

A rigorous grid connection route assessment was carried out as part of the EIA process. Three options were initially explored as part of the Grid Connection Assessment. These options are shown in **Figure 2.1**.

With a non-contestable Gate 3 grid connection agreement in place between Derreenacrinnig and ESB Networks (ESBN), it was important for the applicant and ESBN to consider a number of alternative grid connection layouts and routes. Prior to the commencement of development, a number of alternative grid connection routes were considered. The most important factors were to provide an environmentally acceptable and cost-effective solution.

Key consideration was given to environmental matters. For example, some locations have more inherent environmental sensitivities than others. It was possible to avoid such routes in favour of a route which has fewer constraints and more capacity to sustainably assimilate the grid connection.

3.1 Proximity to Ballylicky Substation

Ballylicky Substation was chosen by ESBN as being the most technically favourable electricity node to connect into and a connection offer was made by ESBN on this basis. Each of the route options shown in **Figure 2.1** connect in to Ballylicky Substation. Both overhead and underground grid connections were considered as options. Therefore, the next step of the process was to select the optimum route option. The key criteria in selecting the route options are as follows:

- Minimise Environmental Constraints.
- Routes were selected to minimise the number of watercourse crossings.
- Minimise disruption to residents.
- Minimise traffic and transportation obstruction.
- Avoid indirect and direct impacts on National Monuments.
- Outcomes of Engagement with landowners.
- Minimise underground cable route length to keep the construction period as short as possible and minimise financial outlay.

The processes associated with the construction and operation of the Grid Connection were identified by the Design and EIAR evaluation teams and also through consultation with interested parties.

As shown in **Figure 2.1**, consideration was given to alternative options from the outset of the project where the key consideration was given to the avoidance of adverse effects on the environment. The three options identified above do not traverse any European Sites which was a key consideration in the overall route selection.

As set out above, a number of options were explored for the Grid Connection as part of the EIAR. Consideration was given to various grid connection route alternatives. Both overhead and underground cables (and/or a mix of both) were considered to be technically feasible and viable alternatives for this project.

3.2 Option 1

Option 1 was the preferred route option as it posed the least environmental constraints and was a more cost-effective option than Option 2 and 3.

3.3 Option 2

Option 2 located to the south of the site of The Derreenacrinnig West Wind Farm was discounted on the basis that it is located in close proximity to a number of archaeological sites. There are a number of dwellings along this route which were not receptive to the proposals and on that basis that option was discounted.

3.4 Option 3

Option 3 located to the north of The Derreenacrinnig West Wind Farm was discounted because of topographical constraints relating to steep gradients and irregular landform. The route explored as part of option 3 entailed a number of stream and river crossings.

3.5 Detailed Route Analysis

Following the selection of **Option 1** identified above, a more detailed route analysis was carried as part of the EIA process.

3.6 Environmental Impacts

Key consideration was given to Environmental considerations. In some cases (e.g. river crossings) an overhead line can have a lower environmental impact than a trenched cable crossing. This was another key consideration in the determination of the preferred route. River crossings were unavoidable as each of the identified routes involve a river crossing.

3.7 Archaeological Constraints

Key consideration was given to archeological sites are part of the preferred grid connection route. The preferred route was considered to have the least impact on National Monuments.

3.8 Landowner Engagement

Landowner consent was another critical factor in determining the preferred route. For example, Option 2 and Option 3, were considered less viable due to landowners not being willing to engage in a reasonable way with these options.

3.9 Technical Feasibility

Over longer distances and higher power levels, there are fundamental electrical engineering constraints on how much power can be transported efficiently on cables. Out of the three route options shown, option 1 proved to be the most technically feasible.

3.10 Visual Impact

In terms of visual impact each of the options explored are partially located within a High Landscape Area in the Cork County Development Plan. The preferred Grid Connection route was considered to have the least visual impact, is located where possible, close to forestry for background screening.

3.11 Conclusion

Having regard to the above, it is considered that a rigorous route selection was carried out before arriving at the Grid Connection route, part of which is now the subject of a planning application.

4.0 SCREENING FOR APPROPRIATE ASSESSMENT

A Screening Assessment of the existing development, incorporating the electricity cable grid connection and the consented Wind Farm was carried out for the European Sites occurring within its zone of influence. It was concluded that the proposed development would not have the potential to result in likely significant effects to European Sites occurring within the wider zone of influence of the development. As such, an Appropriate Assessment was not required for the proposed development.

The existing grid connection, subject to substitute consent, should be considered in the following context:

- It does not traverse any Natura 2000 site and there was no removal of or interference with habitat within any European site;
- The AA Screening carried out as part of the Exempted Development Screening Study carried out in May 2016 concluded that the "*project alone, or in-combination with other projects will not have any significant direct or indirect adverse impacts on Glengarriff Harbour and Woodland SAC, Derryclogher (Knockboy) Bog SAC and Caha Mountains SAC.*"
- There was no interference with protected species and there is no known rare or protected flora or habitat along the route of the grid connection; and
- There have been no environmental and ecological impacts arising from the constructed grid connection works.

5.0 CASE LAW RELATING TO SUBSTITUTE CONSENT

5.1 Case Law Relating to Substitute Consent

In North Kerry Wind Turbine Awareness Group v. An Bord Pleanála [2017] IEHC 126. Mr Justice McGovern held that the grid connection need not be included in the same planning application as the wind farm but that in respect of the application for planning permission of the wind farm " *the E.I.A requires information on the grid connection to enable a full E.I.A to be carried out and for the Board to assess the likely significant impact of the windfarm and the grid connection as a whole*." It is also consistent with the decision in O'Grianna (No. 1). The application was remitted to the Board to enable it to

carry out a cumulative assessment of the wind farm and the grid connection, not on the basis that it was one single project.

5.2 Derrysallagh Windfarm Ltd – ABP-300811-18

The precedent for such cases has been established under planning appeal reference ABP-300811-18 for Substitute Consent under Section 177E of the Planning and Development Acts 2000-2018. In the determination of that appeal, the Inspector in section 7.4 of the report considered that the development

"*would facilitate the operation of a permitted windfarm which itself was deemed to be compliant with national policy and the provision of the Sligo County Development Plan on renewable energy. Similar provisions are set out in the development plans for Leitrim and Roscommon that would support the proposed development. It is therefore in accordance with relevant planning policy. The development is not a threat to road safety, or to the amenities of property in the vicinity. It is noted that the members of the public who made submissions in subsequently made submissions withdrawing their objections to the application."*

Section 9.0 of the Inspector's report set out reasons and considerations:

"It is evident from the nature, scale and location of the development, and from the rEIAR and the submissions made in connection with the current application, that the construction of the development would not have had significant effects on the environment and that its operation and decommissioning are not likely to have significant effects on the environment, either when considered in isolation or in cumulation with other development including the permitted windfarm at Derrysallagh and the completion of its connection to the national grid. The development would facilitate the operation of the windfarm at Derrysallagh and so would be in accordance with national policy regarding the exploitation of renewable energy resources and with the provisions on the issue set out in the development plans for Counties Sligo, Leitrim and Roscommon."

5.3 Planning Policy Framework

The planning policy framework is supportive of renewable energy projects. In particular, we highlight the findings from the Climate Action Plan 2019**.**

Climate Action Plan 2019

The "*Climate Action Plan 2019"* was published by the Government on 17 June 2019. The aim of the plan is to make Ireland a world leader in responding to climate change. The Plan is ambitious, affecting almost every sector of the economy. The key focus of the Plan is to identify how the Government plans to reduce Ireland's growing greenhouse gas emissions.

The plan is designed to set the country on a trajectory to achieve net zero-carbon emissions by 2050. By 2030, 70 per cent of power generation will be from renewable energy – more than double the current position. However, in reality, it will be far greater as energy usage for heat and transport transitions from hydrocarbons to electricity.

The goal is that Ireland will achieve its EU emission reduction targets for the year 2030. The Plan includes a new commitment to make Ireland 100% carbon neutral by 2050. The Plan contains 183 action points designed to achieve our national climate change targets. The scale of the challenge is huge, and the Plan identifies the need for everyone to contribute in tackling the challenges posed by climate change. It includes increased renewable electricity targets4, the end of single use non-recyclable plastics and new building regulations. It will impact how our homes and businesses are heated, how we generate and consume electricity, how we travel and how food is produced.

Energy Sector

The goal in the energy sector is to make Ireland less dependent on imported fossil fuels. To achieve this, energy needs to be decarbonised by harnessing renewable resources, particularly wind (both onshore and offshore), solar PV and biomass powered CHP.

The targets set out in the Climate Action Plan 2019 envisages a radical step-up of our existing targets in order to meet the required level of emissions reduction by 2030, including:

- A reduction in CO2 eq. emissions by 50–55% relative to 2030 NDP projections.
- An increase in electricity generated from renewable sources to 70%.

- An objective to meet 15% of electricity demand by renewable sources contracted under Corporate PPAs.

The plan sets out 4 key measures to meet these targets:

1. Harnessing Renewable Energy

The transition to 70% renewable electricity will be made possible by a significant increase in onshore wind, offshore wind and solar PV. The recently announced Renewable Electricity Support Scheme (RESS)7 will be a key policy measure to drive this growth. It is hoped that RESS will be open for applications by the end of 2019. However, given that the detailed auction design and State Aid approval are still awaited, that deadline may well slip into Q1 or even Q2 of 2020.

Although RESS is expected to be designed as a series of technology neutral auctions based on the lowest levelised cost of energy (LCOE), the Government has set out the following indicative levels of renewable electricity generation in the Plan:

- at least 3.5 GW of offshore wind
- up to 8 GW of onshore wind
- up to 1.5 GW of grid scale solar energy

The Plan envisages that 15% of electricity demand will be met by renewable sources contracted under Corporate PPA's. It is expected that a key driver in the growth of Corporate PPA's will be the expected increase in data centres, which will lead in turn to a massive increase in demand for electricity.

2. Phasing out Fossil Fuels

Removing fossil fuels from the grid will be essential in the coming years. There are plans to replace coal fired generation with low carbon and renewable technologies.

3. Micro-generation

There will be a change in the electricity market rules in early 2020 in order to enable micro-generated electricity to be sold by businesses and householders to the grid.

4. Other Measures

Other measures include continued support for the DS3 programme, support for research on nascent ocean energy technologies (e.g. floating wind, tidal and wave technologies) and continued support for the development of combined heat and power generation (CHP).

6.0 LIKELY SIGNIFICANT DIRECT AND INDIRECT EFFECTS

The likely significant indirect effects of the development are considered under the headings below which follow the order of the factors set out in Article 3 of the EIA Directive 2014/52/EU:

- population and human health;
- biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC;
- land, soil, water, air and climate;
- material assets, cultural heritage and the landscape; and
- the interaction between those factors

6.1 Population and Human Health

The installation of a grid connection of this size is commonplace and are a feature of the rural landscape. The development would not have been likely to have had any significant effect on population or human health during construction nor would it be likely to have such an effect during its operation.

6.2 Biodiversity with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC

The development is not in or immediately adjacent to any Natura 2000 sites, and the need for an appropriate assessment was screened out before planning permission was sought for the Grid Connection. No information has arisen in the course of this application for substitute consent that would support a different conclusion. The potential for indirect effects on habitats arises from the potential for an effect on the quality of waters

downstream of the site or the drainage of adjoining land, much of which is bog, that might have arisen during construction.

6.3 Land

The development has been out on agricultural fields and public roadways, but the development will not alter/deter the use of the land for agricultural purposes.

6.4 Air

The construction of the Overhead Lines in the road would not be likely to have had a significant effect on air. Its operation would not have any such effect either.

6.5 Climate

The development is not likely to have a significant effect on climate. It will facilitate the operation of a windfarm which will give rise to an indirect positive effect on climate change by reducing the demand to burn fossil fuels, but the magnitude of this effect would not be significant.

6.6 Material assets

The grid connection will not alter the use of the road and the agricultural fields in which the Overhead Line traverses. It would allow the permitted Derreenacrinnig West windfarm to operate. Its impact on material assets would be positive to the extent that the operation of the permitted windfarm would have a positive environmental impact. This has been addressed in the completed remedial EIAR for the windfarm.

6.7 Cultural Heritage

A cumulative impact assessment report was prepared for the Substitute Consent application that existing/built grid connection. The lands impacted by the constructed Overhead Grid Connection and the lands relating to the proposed Grid Connection were both inspected on the 08th March and 10th May 2017 and again as part of this cumulative impact assessment on Tuesday 16th October 2018.

Conclusions on Cumulative Impacts

The assessment of the combined wind farm development and grid route connection has identified a number of slight visual impacts on archaeological monuments while no direct impacts have been identified. The works completed to date at the Derreenacrinnig West Wind Farm development site have resulted in no impact on the archaeological resource of the area.

Constructed Overhead Line

It is noted that the "as constructed" sections of the OHL were not monitored by an archaeologist. Generally, however, the footprints and associated ground disturbances of the poles and stay supports are quite small (usually less that 1m2 each). Given that the site walkover/desktop assessment considered that such locations, outside the zone of notification (ZON) of recorded monuments, were of low archaeological potential, it is unlikely that any artefacts, features or deposits of an archaeological nature were disturbed during construction works. Nevertheless, this cannot be discounted.

A marginal encroachment (without the required consent) into the Zones of Notification (ZON) of three recorded monuments in Derryarkane townland occurred during the construction of the OHC. This occurred during the erection of 'Pole 61' (ZON of fulacht fia CO106-079----) and 'Pole 63' (ZON of stone circle – five-stone (CO106-019----), and standing stone (CO106-057----) which combined form National Monument No. 600). No direct impacts at these monuments were identified.

The constructed portions of the OHC have resulted in a very slight visual impact occurring at the following sites within the study area: ringfort (CO106-009----) in Ardrah; ringfort (CO106-020001-) and standing stone (CO106-021----) in Maulikeeve; fulacht fia (CO106-077001-) in Derryarkane.

The constructed portions of the OHC have resulted in a slight visual impact occurring at the following sites within the study area: standing stone (CO106-114----); stone circle – five-stone (CO106-019----) and standing stone (CO106-057----) (National Monument No. 600) in Derryarkane; standing stone (CO106-077002-) and fulacht fia (CO106-079---) also in Derryarkane.

6.8 Landscape

There are 5 sections of overhead cables constructed to date. The overhead line has been assimilated into what is a working landscape where there already overhead lines currently exist. Photographs No 1 -5 demonstrate this point.

Photograph 1 -View to west along Mealagh valley through which the constructed OHC extends

Photograph 2 - View to the northwest of constructed OHC

Photograph 3 - View of the Overhead Grid Connection Westwards

Photograph 4 - View north-westwards towards Pole 58

Photograph 5 - View of the Pole 63 of the constructed OHL

6.9 The Interaction Between the Above Factors and Cumulative Impact with Other Development

As the development is unlikely to have had or to have a significant effect on: population and human health; biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC; land, soil, water, air or climate; material assets, cultural heritage or the landscape, there are no other significant effects on the environment that are likely to have arisen or to arise from the development due to the interaction between those factors or due to cumulative impact with other development, including the permitted windfarm at Dereenacrinnig West Wind Farm or the grid connection to it.

6.10 Assessment of other issues

The development will facilitate the operation of a permitted windfarm which itself was deemed to be compliant with National Policy and the provisions of the Cork County Development Plan on renewable energy. The adoption of the Climate Action Plan 2019 sets out ambitious targets for renewable energy. The plan sets out target of 8.2GW of further onshore wind capacity in order to achieve 70% renewable electricity by 2030 so there an even more pressing need to deliver this project.

6.11 Do-Nothing Scenario

The do-nothing scenario relative to the permitted wind farm development would mean that no development of the lands would occur. There would be no implications for the subject site, positive or negative. The most likely outcome without management for this site would be eventual reversion to scrub – a natural succession of the vegetation established on site.

6.12 Mitigation Measures

As outlined above, the existing and proposed underground cable development in isolation and in combination with the permitted wind farm has the potential to impact on various environmental aspects, with interactions and inter-relationships between these aspects as described above. The EIAR has considered these interactions and inter-relationships throughout the appraisal, firstly through the design and layout of the proposed underground cable to avoid impacts where possible and also in the definition of suitable mitigation measures to minimise the impacts. The EIAR/EIS has also described the interactions between the proposed cable route and permitted turbines and on-site infrastructure.

In summary, based on the long-term positive impacts of the proposed development and the permitted development, and the low level of negative impacts (as mitigated, where required), it is considered that the proposed development and the permitted development will not have a significant impact on the receiving environment.

6.13 Inspectors Report – 10/857 -Consented Derreenacrinnig West Wind Farm

The Inspector's Report for the consented wind farm sets out at paragraph 10.1 that *"It is policy at local, regional and national levels to promote the development of renewable energy sources, and in particular wind energy developments. The subject lands are not located within an area identified as either a Strategic Search Area or as a Strategically Unsuitable Area for Wind Energy Development and there are existing windfarm developments in the wider area. The lands are not subject to any other conservation or amenity designations which would necessarily preclude their development in this regard. The development plan provides, therefore, that development of the nature proposed is to*

be assessed on its own merits having regard to normal planning criteria, including visual impact on protected views and prospects. Having regard to the foregoing, it is considered that development of the nature proposed is open for consideration at this location."

In paragraph 10.5 the Inspector concluded that Flora, Fauna and Fisheries:
"*This upland site consists predominantly of exposed or thinly covered bedrock and wet heath / upland blanket bog, with forestry plantation occupying much of the northern part 10 of the site. The EIS notes that only approx. 10% of the site is overlain by peat, with blanket bog occurring only where peat is more than 0.5m deep. The southern slopes are largely free from peat of more than 0.5m depth. The site is not affected by any conservation designations. The nearest designated site is Carriganass Castle pNHA, located over 7km northwest of the site near Kealkill. This is the second largest nursery colony of Daubenton's Bat in the country which species is described in the EIS as being dependent on aquatic insects. There are no records of rare or protected species of flora within this 10km grid and none were recorded on the site. The River Ilen is identified as an important salmonid river and Freshwater Pearl Mussel occurs within the system. While the Freshwater Pearl Mussel is known to occur quite high up the Ilen system, exact 20 location of populations are unknown*."

Having regard to the characteristics of the site and the nature of development proposed, it is not considered that the proposed development would give rise to unacceptable impacts on habitats or species of conservation interest.

The Inspector in his assessment of the planning application for the consented windfarm concluded that *"The lands are not subject to any specific conservation or amenity designations which would preclude their development as proposed. The development plan provides, therefore, that development of the nature proposed is to be assessed on its own merits having regard to normal planning criteri*a."

The site is not affected by any conservation designations. The nearest designated site is Carriganass Castle pNHA over 7km northwest of the site. Only approx. 10% of the site is overlain by peat, with blanket bog occurring only where peat is more than 0.5m deep. 40 No evidence of either Geyers Whorl Snail or Kerry Slug species were found on the

site. An area of 1.7ha at the southern end of the site has been identified for habitat restoration. *Having regard to the characteristics of the site, the nature of development proposed and the identified mitigation measures, it is not considered that the proposed development would give rise to unacceptable impacts on habitats or species of conservation interest.*

7.0 CONCLUSION

The remedial EIAR prepared for this Substitute Consent Application, demonstrates that the proposals would not have any significant effects on the environment and its operation and decommissioning are unlikely to have significant environmental effects, either in insolation or in combination with the consented Derreenacrinnig West Wind Farm.

The development accords with both National and Local Plan Policy. In particular the objectives for renewable energy set out in The Climate Action Plan 2019. In particular, the project if completed will help meet the objectives of the Climate Action Plan 2019, where there is a pressing need to meet renewable energy targets.