

Planning Report

Crory Wind Farm Group Grid
Connection Substitute Consent
Co. Wexford





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1. INTRODUCTION

This report has been prepared by MKO for ESB Networks Designated Activity Company (hereafter referred to as “ESBN”) to support an application to An Bord Pleanála (ABP) for substitute consent of the Crory Wind Farm Group grid connection.

The Crory Wind Farm Group (hereafter referred to as “CWFG”) is located west / northwest of Ferns in County Wexford. It consists of Ballycadden Wind Farm (permitted under PI Ref. 2009/1730), Ballynancoran Wind Farm (permitted under PI Ref. 2003/3444), Gibbet Hill Wind Farm (permitted under PI Ref. 2009/0266) and Knocknalour Wind Farm (permitted under PI Ref. 2011/0504). The four separate wind farms, consisting of a total of 21 no. turbines became operational at different times in 2012 and 2013.

The wind farms are connected to the national electricity grid by a medium voltage 20 kV underground grid connection cable (with a short section of overhead line) which runs from the wind farms to Crory 110 kV substation. The grid connection works were undertaken by the wind farm developers, ESBN and/or their agents, under the supervision of ESBN. The grid connection infrastructure is now under the operational control of ESBN. The construction and operation of the wind farms and grid connection were approved by the Commission for Energy Regulation (CER) through the issuing of Authorisation to Construct Consents and Generating Licenses.

This application for substitute consent is being made under Section 177E of the Planning and Development Act 2000, as amended, to regularise planning permission for a built grid connection to connecting the CWFG to the Crory 110 kV substation.

2. THE APPLICANT

The applicant for the development is ESBN, a subsidiary within ESB Group. ESBN are the licensed operators of the electricity distribution system in the Republic of Ireland and are responsible for building, operating, maintaining and developing the electricity network and serving all electricity customers across the country.

3. LOCATION OF THE DEVELOPMENT

The CWFG grid connection is located approximately 3 - 12 kilometres west / northwest of Ferns in County Wexford. The CWFG grid connection is a linear site which extends from the Crory 110 kV substation in the south to the Knocknalour and Ballynancoran windfarms in the north, a straight line distance of approximately 12km. A spur to the east extends to the Ballycadden Wind Farm and a spur to the west extends to the Gibbet Hill Wind Farm. The CWFG grid connection and all ancillary works are located in the townlands of Ballyroebuck, Ballyandrew, Tincurry, Ballaman, Ballynancoran, Corah, Kiltilly, Curralane Oldtown, Knocknalour, Moneydurtlow, Bolinahaney, Bolacaheer, Graigue More, Tombrack, Boris, Ballycarney, Curraduff and Boolnadrum, Co. Wexford.

The area surrounding the CWFG grid connection is characterised by good quality arable land with a substantial amount of one-off housing. The subject grid connection is predominantly located underground within the public road network. The main exceptions to this are as follows:

- The initial connection to the Crory 110 kV substation comprises an underground cable which crosses two fields (a distance of approximately 500 metres);
- The final connection segment to Ballycadden Wind Farm is an underground cable installed in a private road, a track and fields (a distance of approximately 1,000 metres);
- The final connection segment to Gibbet Hill Wind Farm is an underground cable routed across a private road, a track and fields (a distance of approximately 800 metres); and
- The link section between the Knocknalour and Ballynancoran Wind Farms comprises an overhead power line across fields (a distance of approximately 2 kms).



Overall, the CWFG grid connection consists of a medium voltage 20 kV grid connection comprising c. 26 km of 20 kV underground cable and c. 2 km of 20 kV overhead powerline.

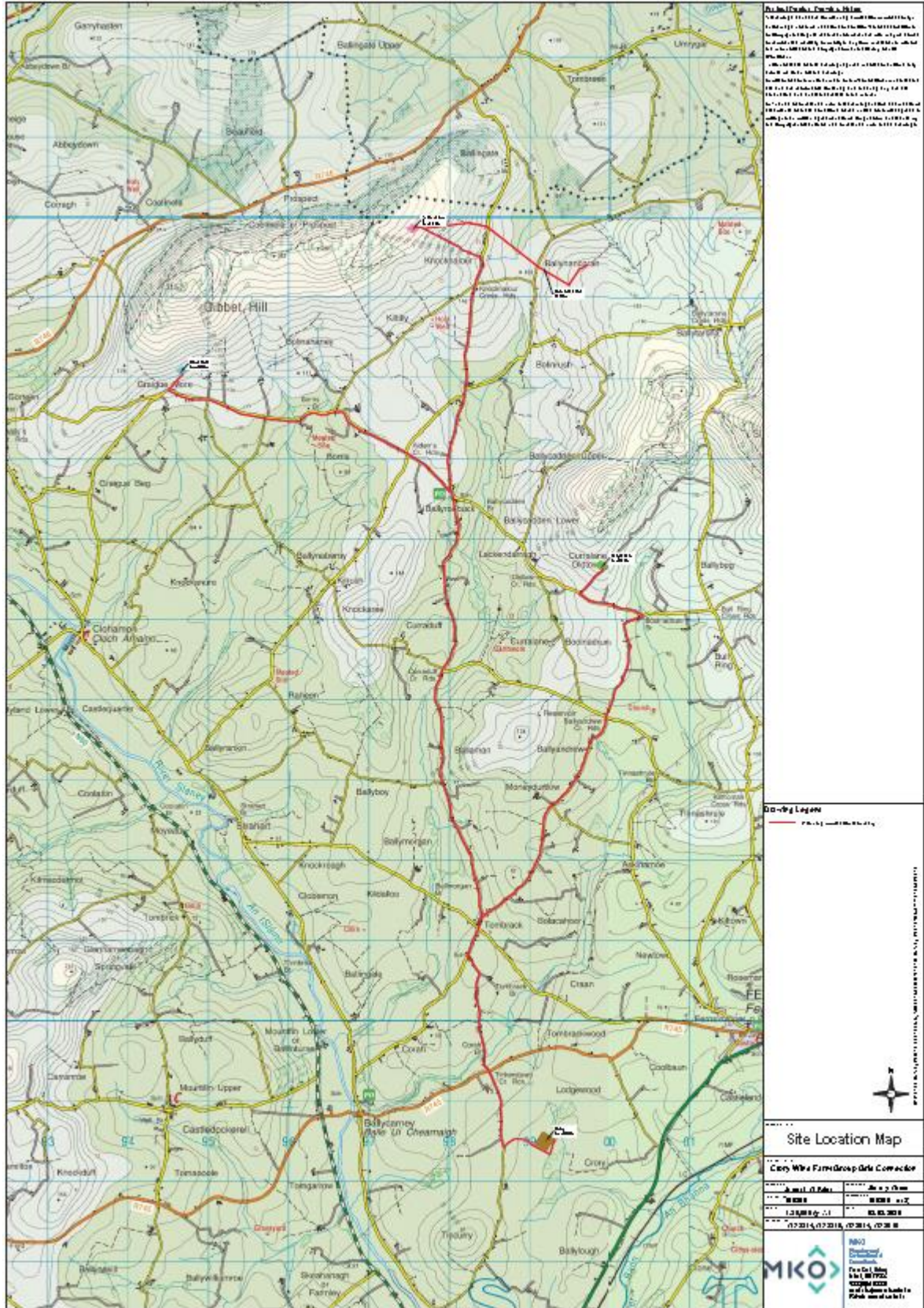


Figure 1. Site Location Plan

4. BACKGROUND TO SUBSTITUTE CONSENT APPLICATION

4.1 Crory Wind Farm Group – Planning History and Grants of Conditional Permission

The planning permissions for Ballycadden Wind Farm, Ballynancoran Wind Farm, Gibbet Hill Wind Farm and Knocknalour Wind Farm, are summarised below. The complete assessment of the planning history for the CWFG is provided in **Chapter 2** of the accompanying remedial Environmental Impact Assessment Report (rEIAR).

4.1.1 Ballycadden Wind Farm

Ballycadden Wind Farm Ltd. lodged an application (**PI Ref. 2009/1730**) to Wexford County Council (Planning Authority) on the 22nd of December 2009 for the development of a wind farm of up to 9 no. wind turbine generators to export electricity with a hub height of up to 85 metres and a blade length of up to 41 metres, the construction of an electrical substation, site roads, meteorological mast and ancillary services in the townlands of Ballycadden Lower, Ballycadden Upper, Currellane, Oldtown, Lackendarragh and Bolinrush. The Planning Authority granted conditional permission in April 2010. Relevant to the subject development, 2 no. conditions attached to the grant of the permission required the following:

1. *7. Prior to commencement of works on site, the applicant shall obtain planning permission for connection of the wind farm to the National Grid. Reason: In the interest of clarity and the proper planning and sustainable development of the area.*
2. *15. This permission shall not in any way be construed as any form of consent or agreement to a connection to the national grid or to the routing or nature of any such connection. Reason: In the interest of clarity and the proper planning and sustainable development of the area.*

The Ballycadden Wind Farm was commissioned in 2012 and is currently operational.

4.1.2 Ballynancoran Wind Farm

K. McCarthy lodged an application (**PI Ref. 2003/3444**) to the Planning Authority on the 9th of October 2003 to develop a wind farm consisting of 2 no. wind turbines and service trackways on the site and ancillary work, including the erection of an electrical transformer compound, control housing and anemometer on the same site in the townland of Ballynancoran, Ballybeg. The Planning Authority granted conditional permission on the June 2004 which included the following condition:

1. *10. Prior to the commencement of development, planning permission shall be obtained for the erection of powerlines to facilitate the connection of the proposed wind turbines to the national grid. Reason: In the interest of the proper planning and development of the area.*

A second application was lodged by K. McCarthy (**PI Ref. 2011/0202**) to the Planning Authority for modifications to existing site tracks including the installation of underground electrical cables, widening of site entrance, construction of 2 no. Crane hard-stand areas and the relocation of an electrical substation previously consented under PI Ref. 2003/3444. The purpose of this development was to facilitate access and construction of the previously consented development. Conditional permission was granted by the Planning Authority for this development on the 27th of May, 2011.

The Ballynancoran Wind Farm was commissioned in 2013 and is currently operational.

4.1.3 Gibbet Hill Wind Farm

D. Kennedy and Wexwind Ltd. lodged an application (**PI Ref. 2003/3753**) to the Planning Authority for the erection of 3 no. wind turbines not exceeding 80 meters hub height with a rotor diameter not exceeding 72 meters, and ancillary buildings and roadways at Kiltilly, Kilrush. Conditional permission for the development was granted by the Planning Authority on the 11th of February, 2004. Wexwind Ltd. lodged a second application (**PI Ref. 2009/0266**) to the Planning Authority on the 27th of February 2009 for the construction of a wind farm consisting of 6 no. turbines, not exceeding 80m hub height with rotor diameter not exceeding 90m and ancillary building and roadways in and ancillary works in the townlands of Graigue More, Bolinahealy and Kiltilly, Kilrush. The Planning Authority granted conditional permission in December 2009.

1. **7.** *Prior to commencement of works on site, the applicant shall obtain planning permission for connection of the wind farm to the National Grid. Reason: In the interest of clarity and the proper planning and sustainable development of the area.*
2. **17.** *This permission shall not in any way be construed as any form of consent or agreement to a connection to the national grid or to the routing or nature of any such connection. Reason: In the interest of clarity and the proper planning and sustainable development of the area.*

ABO Wind Ireland Ltd lodged an application (**PI Ref. 2011/0083**) to the Planning Authority for the construction of a new approach road 292.50m long and the widening of an existing forest track on the 1st of February, 2011. This new approach road was proposed to connect to the north of the Gibbet Hill Wind Farm, as previously approved under PI Ref. 2009/0266. The Planning Authority granted conditional permission for the proposed development of the 29th of April, 2011.

The Gilbert Hill Wind Farm was commissioned in 2013 and is currently operational.

4.1.4 Knocknalour Wind Farm

Knocknalour Wind Farm Ltd. lodged an application (**PI Ref. 2011/0504**) to the Planning Authority on the 30th of May 2011 for the development of a wind farm of up to 4 wind turbine generators to export electricity with a hub height of up to 85 metres a rotor diameter of up to 82 metres and ancillary works including, the construction of a crane hardstanding for each turbine, an electrical substation, underground cabling, site roads, and ancillary services in the townland of Knocknalour, Bunclody. An EIS was undertaken for the proposed development and submitted with the planning application. The Planning Authority granted permission in August 2011, which included the following condition:

1. **8.** *Prior to commencement of works on site, the applicant shall obtain planning permission for connection of the wind farm to the National Grid. Reason: In the interest of clarity and the proper planning and sustainable development of the area.*

The Knocknalour Wind Farm was commissioned in 2013 and is currently operational.

4.2 CWGF National Grid Connection – An Bord Pleanála Referral

An application (**PI Ref. EXD00574**) was lodged under Section 5 of the Planning and Development Act 2000 (as amended) to the Planning Authority in August 2015 requesting that the Authority make a determination on whether the provision of grid connections from the Croy 110 kV substation to the Ballycadden, Gibbet Hill, Knocknalour and Ballynancoran wind farms is or is not development and is or is not exempted development. The Planning Authority, in its consideration of the matters raised within the application, decided to refer the Section 5 request to ABP in the interest of clarity under Section 5(4), Planning and Development Act 2000 (as amended).

Four separate referrals were made to ABP in relation to the CWFG grid connection, ABP Refs: **RL 3408/09/10/11**. The shared query of these referrals was whether the provision of the grid connection to

each of the wind farm sites constituted exempt development. The Board determined on the 28th of June, 2016 that the provision of grid connections from the Croly 110 kV substation to the Ballycadden, Gibbet Hill, Knocknalour and Ballynancoran wind farms is not exempted development. This decision was predominantly based on the following key points (as recommended within Planning Inspector's Report dated 17 June 2016):

- The said grid connections come within the scope of Sections 2(1) and 3(1) of the Act and constitute development;
- The said grid connections come within the scope of article 9(1)(a)(i), Planning and Development Regulations, 2001, as amended, as their construction *contravened* Conditions 7, 7, 8 and 10 of planning permissions PA Ref.s 2009/1730; 2009/0266; 2011/0504; and 2003/3444 respectively, being the planning permissions for the relevant wind farms (Ballycadden; Gibbet Hill; Knocknalour; Ballynancoran).

The Applicant lodged an application to the Board (**ABP-301989-18**) seeking Leave to Apply for Substitute Consent for the CWFG grid connection on the 29th June 2018. The Board granted leave to apply for substitute consent under Section 177D of the Planning and Development Act 2000 (as amended) on the 23rd of June, 2019, and subsequently, a grant of permission for extra time to lodge an application for substitute consent on the 5th of May 2019 (please refer to **Appendix 1**). The Board's decision was based on the conclusion that an environmental impact assessment and appropriate assessment are required and that exceptional circumstances exist such that it is appropriate to permit the opportunity for the regularisation of the subject grid connection.

5. THE EXISTING WORKS

The CWFG grid connection route is located approximately 3 - 12 kilometres west / northwest of Ferns in County Wexford at its nearest point. The route extends from the existing Croly 110 kV substation in the south to the Knocknalour and Ballynancoran windfarms in the north, a straight line distance of approximately 12 kms. A spur to the east extends to the Ballycadden Wind Farm, and a spur to the west extends to the Gibbet Hill Wind Farm.

- An overhead power line connects the two turbines of the Ballynancoran Wind Farm to the Knocknalour Wind Farm substation. From the Knocknalour Wind Farm, the CWFG grid connection consists of an underground cable that runs southeast through the windfarm site and emerges from the site onto the existing public road at Grid Reference Coordinate *E298,402 N159,504 (Irish National Grid)*. From this point, the underground cable route runs south along the L-5114, the L-5143, the L-5141, the L-5133, the L-5132, and the L-6072 crossing the R-745 at Grid Reference Coordinate *E298,499 N149,371*. The cable route diverges from the public road at approximately Grid Reference Coordinate *E298,662 N148,494* and runs west to terminate at the Croly 110 kV Substation.
- The western spur that serves the Gibbet Hill Wind Farm in the townland of Graigue More exits the wind farm site at approximately Grid Reference Coordinate *E294,526 N157,843* and runs east along the L-1017 before joining the cable from Knocknalour Wind Farm at the L-5143 junction with Ballyroebuck townland.
- The eastern spur that serves the Ballycadden Wind Farm joins the L-1017 at approximately Grid Reference Coordinate *E299,626 N155,319* and runs east along this road before turning south and following the L-5138 southwest to the L-5141 junction at Tombrack townland. All the lines continue in the same trench from this point south to the substation

The as-constructed 2km of 20 kV overhead line consists of 26 wood poles (ranging from 9m to 12.5m above ground) supporting electrical conductor lines and ancillary structures and equipment. The as-constructed underground cable generally consists of cables within the public road (a trench was excavated to a depth of c. 1.2m and to a maximum width of 2.2m - the cables were then placed in ducts within this trench which was then backfilled) with some minor deviations off the public road. The underground cabling route also includes joint bays and other ancillary structures/equipment and is marked by road and bridge markers. All works that have been constructed are the subject of this application for substitute consent.

The construction techniques used to construct the CWFG grid connection were in line with international best practice and fully comply with all ESB and health and safety requirements.

6. PLANNING POLICY CONTEXT

Strategic European, National and Regional policies and objectives unequivocally support the continued investment within and maintenance of Ireland’s renewable energy sector in order to achieve Ireland’s 2030 renewable energy target and subsequent net zero carbon energy system by 2050. The subject grid connection is considered consistent with the overarching planning framework set out in the above European, national, regional and local polices and plans. The rationale for this conclusion is based on the following:

European

- Ireland will likely miss the target set for the period 2013 to 2020 for renewables by about 3% and for cumulative emissions by a little under 5%. Furthermore, EPA’s Greenhouse Gas Emissions 2018-2040 projections indicate that Ireland faces significant challenges in meeting EU 2030 reduction targets in the non-ETS sector and national 2050 reduction targets, particularly in electricity generation. The continued operation of the Crory Wind Farms, dependent upon the subject grid connection, will allow Ireland to continue to progress towards future national and EU targets.

National

- The Irish Government recognises that they must reduce greenhouse gas emissions which come from the energy sector by at least 70% by 2030 (Climate Action Plan 2019) when compared to 1990 levels while ensuring a secure supply of energy. The development of on-shore renewable energy is, however, critically dependent on the implementation of enabling infrastructure, such as the subject grid connection, which will facilitate the continued export of renewable generated electricity on to the national grid.
- The majority of the CWFG grid connection are underground cables laid in the public roads as described by the Wind Energy Guidelines (2006). There are reasonable exceptions to this within the route due to existing infrastructure and associated sensitivities within the surrounding environment. The installation and operation of the CWFG grid connection, both underground and overhead components, has not resulted in any significant impacts on relevant environmental media, and it is considered to be compliant with the “preferred draft approach” as articulated by the Department Circular PL5/2017, and accordingly, the current Draft Revised Wind Energy Development Guidelines.

Regional

- The Southern Region is recognised as having a substantial renewable energy resource potential which can make significant contributions, through wind energy, to the transition towards a more energy efficient society and increasing renewable sources of energy. The subject grid connection will facilitate the on-going operation of the Crory wind farms which will contribute to both national renewable energy generation targets and regional goals regarding energy self-sufficiency.

The subject grid connection is located within the administrative boundary of Wexford County Council, and therefore, the Wexford County Development Plan 2013 – 2019 (as extended), hereafter referred to as the WCDP, is considered the most pertinent planning resource in demonstrating the ‘local’ suitability of the CWFG grid connection. The strategic analysis of the WCDP in the context of the subject grid connection is set out below with a complete planning policy assessment provided in **Chapter 2** of the accompanying rEiAR.

Wexford County Development Plan 2013 – 2019

The WCDP states that the Council is committed to addressing climate change in a proactive manner through the careful consideration of growth and development of its renewable energy sector. Established on this principle, the WCDP sets out the Strategic Vision of the county as ‘*Green-Smart-Sustainable*’.

Similar to the policy ethos established at the higher levels of governance, the WCDP notes its support for the development of sustainable renewable energy sources in order to reduce fossil fuel dependency and greenhouse gas emissions, and ultimately, facilitate the transition to a low carbon economy. It is acknowledged within the Plan that the development and use of renewable sources of energy, e.g. wind, is a sustainable solution to the climate change challenge:

“The energy potential of these resources can be harnessed to meet the energy needs of the county and perhaps can be exported as an economic output. The Council will prioritise the development of renewable energy resources and the maximisation of electricity production from renewable sources where possible.”

The Wind Energy Strategy for County Wexford 2013-2019 sets a target of 255 MW of wind energy by 2019 which would enable the county to generate the equivalent of over 70% of electricity demand via wind whilst also contributing to the national target of 40% electricity consumption from renewables by 2020. The CWFG grid connection and the operation of the 4 no. Crory wind farms will have contributed directly to both the local 70% target and the overarching target of 40%. Renewable energy policies and objectives relevant to the subject grid connection are reproduced below:

- To facilitate the achievement of a secure and efficient energy supply and storage for County Wexford (**Objective EN01**);
- To promote County Wexford as a low carbon county by 2019 as a means of attracting inward investment and to facilitate the development of energy sources which will achieve low carbon outputs (**Objective EN02**);
- To encourage and favourably consider proposals for renewable energy developments and ancillary facilities in order to meet national, regional and county renewable energy targets and to facilitate a reduction in CO₂ emissions and the promotion of a low carbon economy, subject to compliance with development management standards in Chapter 18 and compliance with Article 6 of the Habitats Directive (**Objective EN07**);
- To promote and facilitate wind energy development in accordance with Guidelines for Planning Authorities on Wind Energy Development (Department of Environment, Heritage and Local Government, 2006) and the Wind Energy Strategy which forms part of this Plan, subject to compliance with normal planning and environmental criteria and the development management standards contained in Chapter 18 (**Objective EN11**);
- To have regard to the any future Climate Change Action Plan for the South-East Region (**Objective CC02**);
- To minimise greenhouse gas emissions in order to contribute to a reduction and avoidance of human induced climate change in accordance with the Kyoto agreement. The Council supports and is committed to the National Climate Change Strategy and in general to facilitating measures which seek to reduce emissions of greenhouse gases (**Objective CC04**)

The Wind Energy Strategy also sets out several objectives which the continued operation of the Crory wind farms and corresponding CWFG grid connection, have historically, and will continue to, directly contribute towards their achievement.

- **Objective WE01:** Ensure the security of energy supply by supporting the development of wind energy resources in County Wexford at appropriate scales and in appropriate locations, subject to compliance with normal planning and environmental criteria and the development management standards;
- **Objective WE02:** Aim to achieve a target of 255 MW of wind energy, to enable County Wexford to make the initial steps toward a low carbon economy by 2020;
- **Objective WE03:** Facilitate wind energy development on appropriate sites in the county and work with the relevant agencies to encourage investment in research and technology associated with wind farms and other renewable energy technology; and
- **Objective WE04:** Favourably consider proposals for the development of infrastructure for the production, storage and distribution of electricity through the harnessing of wind energy in appropriate sites and locations, subject to relevant policy, legislation and environmental considerations and the development management standards

Notwithstanding the above, the WCDP acknowledges that the county’s landscapes offer a significant economic asset and sets out a broad aim to ‘*promote and enable appreciation of the county’s landscapes*

and to minimise adverse visual impacts on these landscapes in the interests of the common good' (Objective L03). The CWFG grid connection is located partly within designated "Uplands" (northern areas) and partly within designated "Lowlands" (southern areas) of the county. Due to the number of existing and permitted wind farms and having regard to the areas open for consideration for wind farm development in adjoining counties, the north-west Uplands were designated as a 'Not Normally Permissible' area by the Strategy subsequent to the development of the Croly wind farms.

There is, however, no evidence that the subject grid connection has interfered with any protected landscape character, views or prospects as the majority of the development is located underground. While the overhead line section of the subject grid connection is located in the designated 'Uplands' area, historic assessment of the grid connection by An Bord Pleanála (ABP RL 3408/09/10/11) has effectively screened out its potential for significant impacts, as noted below:

"While the overhead section of the grid connections is located in the designated Uplands in the current Wexford County Development Plan it could not, in my view, be considered to interfere with this landscape character. As previously indicated this section comprises 3 no. cables strung to single wooden poles, similar in nature to the common electricity connections found across the countryside."

As described in full within the accompanying rEIAR (Chapter 10), construction and operation of the subject grid connection has not given rise to any significant effects on landscape character, views and prospects and preservation/conservation objectives.

7. ENVIRONMENTAL CONSIDERATIONS

7.1 'Do-Nothing Scenario'

The existing CWFG grid connection is already constructed and operational. Under the "Do Nothing" scenario, the subject grid connection infrastructure will remain unchanged and continue to provide a connection from the Croly Wind Farms to the national grid. There is no potential for additional environmental impacts associated with this scenario. Retaining the existing grid connection in place is considered to have the least environmental impact.

7.2 Consideration of Alternative Grid Connections

If the existing grid connection infrastructure has to be removed, alternative grid connection routes and/or designs would be sought and implemented to provide grid connections from the CWFG to the national grid.

Removal of the existing infrastructure has the potential for significant impacts to environmental receptors. Furthermore, the existing grid connection route and design were optimised to result in no significant impacts to the environment. It is therefore considered that any alternative grid connection route would likely result in significantly greater environmental impacts than the existing route. Furthermore, the existing grid connection is predominantly located underground within the public road network thus minimising environmental impacts. Alternative designs, such as overhead lines or underground lines located outside of the road network, would result in greater environmental impacts than the existing grid connection. Since all possible alternatives to the existing grid connection would likely result in greater impacts to the environment, these alternatives were not considered further.

7.3 Likely Significant Direct and Indirect Effects

The subject grid connection has been designed with regard to established best practice and installed in line with relevant health / safety and traffic management requirements as per granted road opening licences and supervision by ESBN. It is also important to note that the subject grid connection and the Croly Wind Farms have been approved by the CRU through the issuing of Authorisation to Construct Consents and Generating Licences.

The accompanying rEiAR has assessed the historical conditions of the subject grid connection site prior to site activity taking place (baseline) in comparison to its current post-activity condition in order to determine whether the subject development has resulted in any significant impacts on the surrounding environment during either its construction and/or operational phases. Any environmental impacts during the construction phase were temporary in nature.

Population & Human Health

Impacts associated with the grid connection cabling were limited to the active construction area and were temporary in nature with regard to Tourism and Amenity and Human Health (dust, noise and vibration). There are no potential effects on Population and Human Health during the operational phase of the development as all the required works were completed during the construction phase. Furthermore, there are no emissions associated with the operational phase, in terms of dust or noise and vibration. The road corridors in which underground cable was constructed have been fully reinstated, leaving no visible above-ground evidence of the works other than required safety markers.

Flora & Fauna

All grid connection works took place either along an existing road corridor or in the case of the overhead line, through agricultural lands categorized as improved agricultural grassland and arable crops. These habitats were categorized as Local Importance (lower value) and have been reinstated as part of the completed works. No significant effects with regard to habitat loss have occurred. No works are required during the operational phase of the subject development. As such, the subject grid connection has not had any significant impacts on any flora or fauna of significant ecological importance during the construction phase nor will it have a significant ecological impact during the operational phases of the development.

Geology & Soils

Trenching resulting in the excavation of existing fill, topsoil, subsoil and bedrock was required for the installation of the subject grid connection cable ducts. These works resulted in a permanent removal of subsoil at most excavation locations. All excess material was sent to an authorised soil and stone or waste recovery facility. Trenching was backfilled with imported material as prescribed by ESB standards and Wexford County Council requirements for the reinstatement of the public road. No significant impacts on land, soil and geology have occurred as a result of the construction, or will occur as a result of the operation of the subject grid connection.

Hydrology & Hydrogeology

During the construction phase of the subject grid connection, a number of activities took place which had the potential to significantly affect the hydrological regime or water quality in the watershed. Surface water drainage measures, pollution control and other preventative measures were incorporated into the project design and implemented during construction to minimise significant adverse impacts on water quality and downstream designated sites. There will be no soil disturbance or use of machinery during the operation phase of the subject grid connection. There are no significant impacts on hydrological aspects of the receiving environment as a result of the construction and operation of the subject grid connection.

Air & Climate

The use of machinery during the construction phase of development will have resulted in the minor emission of greenhouse gases. This impact is considered to be imperceptible, given the insignificant quantity of greenhouse gases that will have been emitted. Similarly, the potential for dust emissions from the cable connection works are also considered imperceptible given the small scale of the works areas. The subject grid connection will not result in any emissions to air and has a slight, indirect, positive effect on climate during its operational phase through the transmission of electricity from a renewable source to the national grid.

Noise

The construction works of the underground cabling gave rise to noise impacts on sensitive receptors in the area; however, these noise effects were temporary in nature as the works moved along the underground cable route. There is no noise or vibration generated by the subject grid connection during the operation phase. There are no significant effects in relation to noise associated with the construction or operational phase of the subject development.

Landscape & Visual

The landscape and visual effects during the construction phase of the subject grid connection is likely to have been imperceptible, temporary and transient in nature. There have been no significant operational impacts on landscape associated with the underground section of the subject grid connection whereas the landscape effect of the overhead line is minimal with the effect being mainly visual. The overhead line pole sets and wires are not of sufficient scale or uniqueness to impact on the wider landscape. There are no significant effects in relation to landscape and visuals associated with the construction or operational phase of the subject development.

Cultural Heritage

No National Monuments or recorded monuments are located within 100m of the subject grid connection route therefore impacts to such assets are not identified. One NIAH/Protected Structure is located within 100m of the grid connection route, however, direct impacts to same as a result were not identified. Given the primarily underground nature of the subject grid connection, impacts to the setting of any cultural heritage assets do not arise.

Material Assets

There was the potential for short term nuisance to local road users and residents along the subject grid connection cable route during the construction phase; however, mitigation measures were put in place to minimise the nuisance to road users and residents. The subject grid connection will not generate any additional traffic during the operational phase. There are no significant effects in relation to traffic and transport associated with the construction or operational phase of the subject development.

As demonstrated within the accompanying rEIAR, there is no evidence that the construction and continued operation of the subject grid connection has given rise to any significant environmental or adverse effects on the receiving environment over and above those typical of this type of development, including cumulative impacts with the Crory Wind Farms or any other projects or plans.

7.4

Appropriate Assessment

The remedial Natura Impact Statement (rNIS), undertaken as part of the Appropriate Assessment of the subject grid connection, provides an assessment of all potential direct or indirect adverse effects on European (Natura 2000) sites from the subject development. The rNIS reports that, where there was potential for any adverse effect on any European Site identified, the pathway by which any such effect could occur was robustly blocked through the use of avoidance, appropriate design and mitigation measures. The successful implementation of these measures ensured that the construction and operation of the CWFG grid connection did not, and does not, adversely affect the integrity of European sites.

The rNIS concludes that it can be objectively concluded that the subject grid connection works, individually or in combination with other plans or projects, did not have an adverse effect on integrity of any European Site.

8.

CONCLUSION

Ireland faces significant challenges in meeting its 2020 renewable energy targets, EU renewable energy targets for 2030 and its commitment to transition to a low carbon economy by 2050. The Climate Action Plan (CAP) 2019 states that current policy frameworks will not achieve the level of decarbonisation

required in the electricity sector to meet the 2030 emissions reduction targets. In order to meet these targets, the CAP sets out a requirement for 70% of electricity to be generated from renewable sources by 2030, including an additional 82GW of on-shore wind generation. In this context, the subject grid connection will facilitate the continued operation of the Croly Wind Farms thereby allowing Ireland to continue to progress towards future national and EU targets without any further setbacks. The accompanying rEIAR and rNIS have affirmed the following key conclusions considered material to the overall acceptability of the subject development:

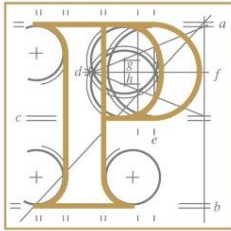
- Due to the requirement for a road opening licence, construction was compliant with relevant health and safety and traffic management requirements;
- There is no evidence of likely significant effects on the environment from the subject grid connection during either construction or its continued operation;
- There is no likelihood of significant effects on European Sites arising from the subject grid connection during either construction or its continued operation;
- The construction and operational phases of the subject grid connection have not historically, nor at present, resulted in interference with landscape character, views or prospects of the surrounding environment;
- The construction and operational phases of the subject grid connection have not historically, nor at present, resulted in the interference with archaeological and other sites of interest, that are the subject of preservation/conservation objectives, within the surrounding environment; and
- The construction and continued operation of the subject grid connection has not historically, nor at present, result in any significant effects over and above those likely to arise from grid connections, wind farms or any other projects or plans that might be considered. The issue of in- combination effects, therefore, does not arise

Given the conclusions of the rEIAR and rNIS, and the fact the CWFG grid connection is consistent with the Wexford County Development Plan 2013 - 2019 and relevant European, National and Regional policies and objectives, it is submitted that the subject development is in accordance with the proper planning and sustainable development of the area and should be granted permission under the provisions of Section 177E of the Planning and Development Act 2000, as amended.



APPENDIX 1

AN BORD PLEANÁLA ORDER: ABP-301989-18 & ABP-305070-19



Planning and Development Acts 2000 to 2018

Planning Authority: Wexford County Council

Planning Register Reference Number: EXD00574

Application for Leave To Apply for Substitute Consent, by ESB International of One Dublin Airport Central, Dublin Airport, Cloghran, County Dublin.

Development: Crory Wind Farm Group Grid Connection serving Knockalour, Gibbet Hill, Ballynacoran and Ballycadden Wind Farms, County Wexford.

Decision

GRANT leave to apply for substitute consent under section 177D of the Planning and Development Act 2000, as amended, based on the reasons and considerations set out below

Matters Considered

In making its decision, the Board had regard to those matters to which, by virtue of the Planning and Development Acts and Regulations made thereunder, it was required to have regard. Such matters included any submissions and observations received by it in accordance with statutory provisions.

Reasons and Considerations

Having regard to Section 177D of the Planning and Development Act, 2000, as inserted by Section 57, Planning and Development (Amendment) Act, 2010, the Board is satisfied that an environmental impact assessment and an appropriate assessment are required.

Furthermore, the Board examined whether or not exceptional circumstances exist such that it would be appropriate to permit the regularisation of the development by permitting leave to make an application for substitute consent. In this regard the Board considered -

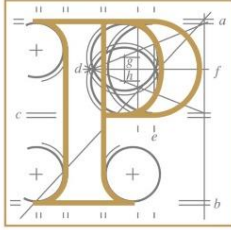
- (a) that the regularisation of the development would not circumvent the purpose and objectives of the Environmental Impact Assessment Directive or of the Habitats Directive,
- (b) that the applicant could reasonably have had a belief that the development was not unauthorised,
- (c) that the ability to carry out an environmental impact assessment and an appropriate assessment and for the public to participate in such assessments has not been substantially impaired,

- (d) the nature of the actual/likely significant effects on the environment or adverse effects on the integrity of a European site resulting from the carrying out of the development, and
- (e) that the actual or likely significant effects on the environment or adverse effects on the integrity of a European site, if any, could be remedied.

Taking all of the above into consideration, it is considered that exceptional circumstances do exist such that it would be appropriate to permit the opportunity for the regularisation of the development by permitting an application for substitute consent.

Chris McGarry
Member of An Bord Pleanála
duly authorised to authenticate
the seal of the Board.

Dated this day of 2019.



Planning and Development Acts 2000 to 2019

Planning Authority: Wexford County Council

Planning Authority Reference Number: EXD00574

Application for an Extension of Time to Apply for Substitute Consent by ESB International of One Dublin Airport Central, Dublin Airport, Cloghran, County Dublin pursuant to the determination by An Bord Pleanála on the 25th day of June, 2019, requiring the owner/operator to apply to An Bord Pleanála for substitute consent.

Development: Crory Wind Farm Group Grid Connection serving Knockalour, Gibbet Hill, Ballynacoran and Ballycadden Wind Farms, County Wexford.

Decision

Grant an extension of the period for the making of an application for substitute consent under section 177E (4) of the Planning and Development Act, 2000, as inserted by section 57 of the Planning and Development (Amendment) Act 2010, for a Further Period of 25 Weeks from the end of the original 12 week period that commenced on the 25th day of June, 2019, based on the reasons and considerations set out below.

Matters Considered

In making its decision, the Board had regard to those matters to which, by virtue of the Planning and Development Acts and Regulations made thereunder, it was required to have regard. Such matters included any submissions and observations received by it in accordance with statutory provisions.

Reasons and Considerations

The Board noted the request made for an extension of the period for the making of the application for substitute consent and a request for a pre-application consultation in this instance and, taking into account the circumstances pertaining to this case, was of the opinion that an extension of 25 weeks would be reasonable and appropriate to enable preparation of the remedial Environmental Impact Assessment Report and a remedial Natura impact statement.

Paul Hyde

**Member of An Bord Pleanála
duly authorised to authenticate
the seal of the Board.**

Dated this day of 2019.