



An  
Bord  
Pleanála

## Record of 1<sup>st</sup> Meeting ABP-305260-19

<b>Case Reference / Description</b>	Proposed wind farm consisting of up to 12 number turbines and ancillary site works in townlands of Cark, Meenadaura (Drumnahough Mountain), Carrickalangan, Treankeel, Tullytrasna and Culliagh, Co. Donegal..		
<b>Case Type</b>	Pre-application consultation		
<b>1<sup>st</sup> / 2<sup>nd</sup> / 3<sup>rd</sup> Meeting</b>	1 <sup>st</sup>		
<b>Date</b>	24/10/19	<b>Time</b>	2.30-3.35 p.m.

<b>Attendees</b>
<b>Representing An Bord Pleanála</b>
Anne Marie O'Connor, Assistant Director of Planning (Chair)
Deirdre MacGabhann, Planning Inspector
Ellen Morrin, Senior Administrative Officer
Kieran Somers, Executive Officer
<b>Representing the Prospective Applicant</b>
Shane Liddy, SSE Renewables
Eimear Lenehan, SSE Renewables
Ken Fitzgerald, Malachy Walsh and Partners
Valerie Heffernan, Malachy Walsh and Partners
Michael O'Connor, Coillte

## **Introduction:**

The Board referred to the letter received from the prospective applicant requesting pre-application consultations and advised the prospective applicant that the instant meeting essentially constituted an information-gathering exercise for the Board; it also invited the prospective applicant to outline the nature of the proposed development and to highlight any matters it wished to receive advice on from the Board.

The Board mentioned general procedures in relation to the pre-application consultation process as follows:

- The Board will keep a record of this meeting and any other meetings, if held. Such records will form part of the file which will be made available publicly at the conclusion of the process. The record of the meeting will not be amended by the Board once finalised, but the prospective applicant may submit comments on the record which will form part of the case file.
- The Board will serve notice at the conclusion of the process as to the strategic infrastructure status of the proposed development. It may form a preliminary view at an early stage in the process on the matter.
- A further meeting or meetings may be held in respect of the proposed development.
- Further information may be requested by the Board and public consultations may also be directed by the Board.
- The Board may hold consultations in respect of the proposed development with other bodies.
- The holding of consultations does not prejudice the Board in any way and cannot be relied upon in the formal planning process or any legal proceedings.

## **Presentation by the prospective applicant:**

The prospective applicant provided the Board with an overview of the proposed development which will consist of 12 wind turbines with an expected output of circa 60 megawatts; the proposed development also provides for a battery storage element (six battery units located within the footprint of the substation compound).

The proposed development is located approximately 13 kilometres south-west of Letterkenny and 14 kilometres north-west of Stranorlar.

This is effectively a re-application of the previously consented Drumnahough Wind Farm (register reference number 08/50687 which was for 15 turbines) which was not progressed due to the unavailability of a grid connection. A 167.5-metre tip height is proposed as compared to the previously consented 135-metre tip height following advances in turbine technology.

The proposed turbine layout is being finalised at present; the prospective applicant added that baseline studies are largely complete. The final turbine layout will be different to the previously consented project.

The proposed development is in close proximity to the Meentygrannagh Bog SAC (site code: 000173) and the Tullytresna Bog NHA. The majority of the subject site is also located within the Eske freshwater pearl mussel catchment area.

Data collation and follow-up ecological studies are on-going and engagement with relevant stakeholders and the local community will also continue.

It is intended to lodge the formal planning application prior to the end of 2019.

## **Discussion:**

The following matters were discussed:

- **Development Plan Policy:** The prospective applicant referred to uncertainty arising from the judicial review of the CDP wind energy policy. The Board advised that this should be addressed in the planning application and that National and Regional policy and objectives should also be referenced. The Board enquired as to whether consultations have taken place with representatives from Donegal County Council. The prospective applicant replied that such engagements had taken place prior to the policy lacuna arising.
- **Visual Impact:** The Board recommended that the visual impact assessment/photomontages should address the new tip heights for the proposed turbines. The views of the planning authority regarding viewpoint etc should be sought.

- **Fresh Water Pearl Mussel:** The majority of the site is located within the Eske freshwater pearl mussel catchment area. The prospective applicant confirmed that the FPM was not a QI for any relevant European Site. The Board said that the freshwater pearl mussel then falls to be dealt with by way of EIA as opposed to appropriate assessment. The potential impact on the FPM, including indirect impacts such as haul routes etc and cumulative impacts from other developments, must be thoroughly assessed in the EIAR.
- **EIA:** The Board emphasised that all EIAR documents lodged as part of the planning application would need to be as holistic as possible with regard to direct and indirect effects arising from the proposed development. The climate section of the EIAR would need to examine aspects of the proposed development in the context of the Climate Action Plan and other relevant guidance. Cumulative effects must be considered with regard to other proposed and consented wind farms in the area. A schedule of Mitigation and Monitoring Measures should be submitted.
- **Appropriate Assessment:** The proposed development is in close proximity to the Meentygrannagh Bog SAC (site code: 000173). The prospective applicant stated that there is no direct connectivity with respect to any SPA in the vicinity. A Natura Impact Statement (NIS) is intended as part of the planning application. With respect to bird surveys, the prospective applicant advised that data will include two breeding seasons (18 months) but not 2 full years. The Board underlined the importance that survey work is in accordance with best practice (particularly SNH Guidelines for wind development) and should refer to earlier studies, as necessary. A justification for the survey data presented must be based on scientific reasoning and the data must be sufficient to support any conclusions in the NIS regarding the potential impacts on the European site.
- The Board noted the proximity of a **Merlin** nesting site to the subject site and said that this must be fully addressed, with particular attention to establishing if these birds are connected to a population which is part of an SPA. The same issues arise in respect of Red Grouse. The potential impact on the Merlin or other bird species must still be robustly assessed outside of the NIS if found not to be relevant to the conservation objectives of a European Site.

Consideration should be given to a peer review of the survey work and methodology of the NIS.

- **Borrow Pits:** There will be two borrow pits on the subject site as part of the planning application. The Board advised that documentation submitted should be clear on this as regards calculations and the consequent impacts of the requirement to import material.
- **Soil stability:** New site investigations have been carried out in relation to soil stability as part of the design of the turbine layout. No issues have arisen. The Board stated that all studies/ground investigations should inform the EIAR and all direct and indirect effects assessed (including storage of peat and soil during construction).
- **Haul Routes:** The existing road network will be used for the purposes of site access and haul routes. No significant issues are expected. The Board stated that haul routes should be fully set out in the Traffic Management Plan/CEMP, and all direct and indirect impacts assessed in the EIAR (including potential AA issues).
- **Grid Connection:** Two options are currently being considered. The preferred connection method will be within the subject site and via a new 110kV substation and loop-in connection from the existing Letterkenny-Binbane overhead line. The second option would involve an underground connection back to the previously consented Lenalea substation. A dedicated substation might not be required if the second option for the proposed grid connection is followed. The Board's representatives said that both grid connection options could be presented in the EIAR accompanying the planning application. It also remarked that, in the event of a grant of planning permission, the Board could condition which option should be carried out.
- **Public Consultation:** Engagement with members of the local community is on-going; a preliminary information evening in this regard was held in September 2019. It also advised the Board that a Community Benefit Programme will be implemented in respect of the proposed development as per RESS requirements. Noting the nature and extent of stakeholder and

public consultations undertaken to date, the Board advised the prospective applicant of the need to ensure that these are as robust as possible.

- **Other Consultation:** The Board advised that there would be benefit to further pre-application consultation with the planning authority once the turbine layout is finalised. Particular matters to be discussed should include policy context, visual impact assessment, drainage, and haul routes.
- **Oral Hearing:** The Board noted that it has discretion to hold an oral hearing on a case such as this but advised the prospective applicant that it should not rely on the holding of an oral hearing and should ensure that the planning application it submits is as complete as possible.

### **Conclusion:**

It is the preliminary view that the proposed development would constitute Strategic Infrastructure necessitating a planning application to the Board.

The Board stated its opinion that one meeting would likely be sufficient for this particular case, but advised the prospective applicant that it can request a further meeting if it feels this is required.

If the prospective applicant wishes to close the pre-application consultation process, then it must formally write to the Board in this regard.

The prospective applicant noted this and reiterated its intention to hold a further meeting with representatives from Donegal County Council.

The record of the meeting will issue to the prospective applicant in the meantime.

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**Anne Marie O'Connor**  
**Assistant Director of Planning**