



An  
Bord  
Pleanála

## Record of Meeting ABP-305260-19

<b>Development</b>	Proposed wind farm consisting of up to 12 wind turbines and ancillary site works in townlands including Drumnahough, Co. Donegal.		
<b>Location</b>	Parnell Room		
<b>Case Type</b>	Pre-application consultation		
<b>1<sup>st</sup> / 2<sup>nd</sup> / 3<sup>rd</sup> Meeting</b>	2 <sup>nd</sup>		
<b>Date</b>	15/01/20	<b>Time</b>	11a.m. – 12.30p.m.

<b>Attendees</b>		
<b>Representing An Bord Pleanála</b>		
Anne Marie O'Connor, Assistant Director of Planning (Chair)		
Deirdre MacGabhann, Senior Planning Inspector		
Josephine Hayes, Senior Executive Officer		
Kieran Somers, Executive Officer	k.somers@pleanala.ie	01-8737250
<b>Representing the Prospective Applicant</b>		
Valerie Heffernan, Malachy Walsh and Partners		
Ken Fitzgerald, Malachy Walsh and Partners		
Monica Kane, Malachy Walsh and Partners		

Ger Hayes, Malachy Walsh and Partners
Shane Liddy, SSE
Eimear Lenehan, SSE
Michael O' Connor, Coillte
Sinead O'Malley, Coillte

The Board referred to its previous meeting with the prospective applicant and the record of same, issued on the 20<sup>th</sup> November 2019. The Board advised the prospective applicant that it can raise any matters relating to this record in writing if it wishes to do so. Any such comments would be attached to the pre-application consultation file for the public record.

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

The prospective applicant recapped on the nature and extent of the proposed development which involves 12 proposed wind turbines with an expected capacity of circa 60 megawatts, as well as a battery storage element. The instant proposal is a re-application of the previously consented Drumnahough Wind Farm (register reference number 08/50687) which was not subsequently progressed owing to grid availability issues.

The prospective applicant provided the Board's representatives with an update of the project since the time of the previous meeting. The prospective applicant advised that the likely lodgement date of the planning application has since been revised to ensure that sufficient bird survey data is available. It also reported on-going ecological, hydrological and geotechnical site surveys. The prospective applicant advised the Board that consultations have taken place between it and representatives of Donegal County Council (both Planning Department and Roads Department). A peer review of the ecological elements of the project will also be undertaken as advised by the prospective applicant.

## **Discussion:**

### **Peat Issues:**

- With regard to the presence of peat within the subject site, the prospective applicant said that extensive site investigations (including peat probing) have been carried out in order to better understand and classify existing habitats. The prospective applicant noted the fact that a considerable proportion of upland blanket bog habitat occurs within the subject site (circa 76 hectares) and that an estimated area of 1 hectare of upland blanket bog habitat occurs within the revised footprint of proposed infrastructure. The prospective applicant also advised of the new proposal to re-locate an access road between proposed turbines 8 and 9 further north, to avoid blanket bog.
- The prospective applicant advised that it was intended to use floating roads where peat beds were shallow and where low slopes were present in order to retain the hydrological regime on the site and to protect peat.
- With respect to the offsetting of impacts on peat habitats, the prospective applicant referred to an area of commercial forestry of low ecological value at the north-west of the subject site which is being considered for peatland restoration. This is located to the south of proposed turbines 11 and 12. The prospective applicant confirmed to the Board that any such proposal would be included in the EIAR to accompany the planning application but would not in any way impact on the NIS. Noting this, the Board's representatives said that it would be important to be clear that such a proposal is not related to the Conservation Objectives of any European Site in the vicinity. The prospective applicant acknowledged this and noted a net positive impact on the blanket bog.
- The Board's representatives enquired as to whether some of the upland blanket bog habitat being lost was owing to proposed turbines or access roads. The prospective applicant replied that whilst the locations of some of the proposed turbines have been amended since the time of the previous

meeting, some hardstands will still impact on this particular habitat. The Board noted this and said that this element of the project would have to be robustly justified. The prospective applicant said that it will seek to minimise impacts as much as possible in this regard. The Board noted that the alternatives section of the EIAR would have to address this particular aspect.

**Noise:** The prospective applicant noted the fact that the draft Wind Energy Guidelines have just been published. The prospective applicant also noted that there is considerable discussion within the industry regarding the noise standards in the draft Guidelines. The prospective applicant said that there were circa 9 properties within 1 kilometre of the site, with the closest sensitive receptor to the proposed development circa 850 metres. The prospective applicant said that there are standard mitigation measures which it can implement to deal with any noise impacts arising from the proposed development. The Board noted this and recommended that the prospective applicant set out proposed mitigation measures in the EIAR to accompany the planning application. The views of third parties would have to be taken into account in the observations made in respect of any application. The Board also drew attention to the noise conditions attached by the Board in recent decisions.

**Environmental Impact Assessment:** The Board's representatives emphasised the importance of the Climate Action Plan and reminded the prospective applicant of the need for the Climate sections of the EIAR to be as wide-scoping as possible; for example the effect of the proposed development on carbon storage and use of The SNH Carbon Calculator Tool for wind farm developments, but that this assessment should also have regard to indirect and cumulative impacts.

**Turbine envelope:** The prospective applicant advised that the optimal envelope for proposed turbines is still being considered, as well as likely technology to be utilised. The prospective applicant noted for the record that the design of turbines for wind farm projects is evolving quite rapidly. A worst-case scenario should be presented in the EIAR.

**Landscape/ Visual impact:** The Board's representatives recommended that the visual impact arising from the proposed development be addressed from a community perspective. This should include a cumulative assessment of effects.

**Sediment control measures:** This should be addressed in both the EIAR and NIS with respect to the proposed development.

**Cumulative assessment and Decommissioning:** The Board reiterated the desirability to tie-in on-going survey work with previous survey work in order to produce as comprehensive a picture as possible regarding the subject site. The Board said that it would be important to demonstrate that the surrounding landscape/environment has the capacity to accommodate the proposed development.

The prospective applicant noted the fact that there are several existing wind farms in the vicinity of the subject site, including one coming to the end of its operational life with the possibility of an application for a new wind farm development on the site. The prospective applicant therefore enquired of the Board as to the recommended approach apropos cumulative assessment. The Board's representatives replied that it is important to present a full and clear picture in this regard, as well as a robust rationale for the proposed development in the context of other wind energy projects in the surrounding environs. The Board also recommended that a worse-case scenario be assessed (e.g. concurrent development on adjoining lands).

**Freshwater Pearl Mussel:** The prospective applicant noted that the Finn catchment is the only sensitive catchment area which would be potentially affected by the proposed development. The prospective applicant said that surveys with respect to the Freshwater Pearl Mussel were conducted in selected watercourses but that the Freshwater Pearl Mussel was not recorded in the surveyed reaches of these watercourses. The prospective applicant said that the conclusion of these surveys is that there is no Freshwater Pearl Mussel occurring within the zone of influence of the proposed development.

**Other ecology:** As per the record of the previous meeting, the Board said that the proximity of a Merlin nesting site should be fully addressed. The same applies to the Red Grouse and the Hen Harrier.

**Biodiversity enhancement:** The prospective applicant also reported that it is in the process of considering biodiversity enhancement opportunities. Such options include the establishment of aquatic zones/stream buffer zones/forestry set-back distances, the removal of conifers from riparian areas along watercourses, appropriate tree planting and drainage ditches. The prospective applicant said that such proposals will be firmed up more so once the drainage design for the proposed development is complete.

**Appropriate Assessment:** The Board enquired as to whether any meetings had taken place between the prospective applicant and representatives of the National Parks and Wildlife Service (NPWS). The prospective applicant advised that it has sought a meeting but has not been able to obtain this as of yet. The Board recommended that such a meeting should take place and asked the prospective applicant to pursue this with the NPWS on the basis of this recommendation.

The Board recommended that the effects on the nearby SPA should be addressed with particular regard to mobile species. The Board added that it would be important to demonstrate that the proposed development would not jeopardise any such movements.

The Board enquired as to whether a hen harrier is permanently located on the subject site. The prospective applicant replied that there is not but there have been sporadic sightings. The Board noted this and said that it would be important to contextualise this, particularly in relation to the conservation objectives of any Natura 2000 sites, and outside of AA in respect of the hen harrier's conservation status.

**Consultations:** The Board enquired as to whether any matters of public concern had been raised in relation to the proposed development. The prospective applicant replied that a public event had been held and this had a very limited attendance. It added that a further public event is planned prior to lodgement of the formal planning application.

In relation to the prospective applicant's consultations with Donegal County Council to date, the Board enquired as to whether the local authority had raised any particular issues. The prospective applicant replied that the Council had recommended that it be cognisant of the content of submissions received from statutory bodies on the previous 2008 planning application (register reference number 08/50687) with particular regard to issues raised.

### **Conclusion:**

The Board said that a further meeting on any outstanding ecological issues could be requested by the prospective applicant if it wishes; the Board added that it felt such a meeting may not be required.

The Board enquired as to when the prospective applicant intends to lodge a formal planning application for the proposed development. The prospective applicant signalled that this would be likely circa March/April 2020. The Board advised that the prospective applicant would first have to request closure to the pre-application consultation process. It indicated that it takes approximately four weeks for a SID determination to issue thereafter. The Board advised the prospective applicant not to seek closure to the process until the record of the instant meeting issues at the earliest. It will then be a matter for the reporting inspector to finalise the report for the Board.

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Anne Marie O'Connor

Assistant Director of Planning