



An
Bord
Pleanála

Record of 2nd Meeting

ABP-306229-19

Development	22 wind turbines with an estimated output capacity of circa 110 megawatts together with grid connection and all associated infrastructure at Castlebanny, Co. Kilkenny		
Location	Virtually by Microsoft Teams		
Case Type	Pre-application consultation		
1st / 2nd / 3rd Meeting	2 nd		
Date	29/07/2020	Time	11:00a.m. – 11:50a.m.

Attendees		
Representing An Bord Pleanála		
Rachel Kenny, Director of Planning (Chair)		
Donal Donnelly, Senior Planning Inspector		
Jennifer Sherry, Executive Officer	j.sherry@pleanala.ie	01-8737266
Representing the Prospective Applicant		
John Staunton, TOBIN Project Manager		
Alan Kelly, TOBIN Planner		
Robert Hunt, TOBIN		
Kieran O'Malley, Coillte Project Manager		

Introduction

The Board referred to the previous meeting held with the prospective applicant on the 28th May 2020 and the record of this meeting. The Board enquired as to whether the prospective applicant had any comments it wished to make on the record of this meeting. The prospective applicant replied that it had no comments or corrections to make in relation to this.

Presentation by the prospective applicant

The prospective applicant gave an update on the project under the following headings:

- **Climate Impact Assessment** – the prospective applicant noted the EIAR will include a comprehensive carbon assessment taking into account carbon loss of tree felling, turbine production and construction phase, carbon from backup power generation, loss of carbon sequestration potential of the peat, changes in carbon storage within any drained / removed peat on site. The prospective applicant stressed there is only a small amount of peat on the proposed development site.

The prospective applicant advised a robust argument will be made to support the scale of the development at this site and referenced existing Wind Farms Ballymartin and Rahora in the vicinity of the project as an indicator of an appropriate setting.

- **Landscape Assessment** – the prospective applicant informed the Board that the landscape assessment will take account of the views from the Arrigle Valley to the east and the South Leinster Way. A cumulative assessment will include viewpoints from Ballymartin and Rahora Wind Farms and all other wind farms in the region.
- **Appropriate Assessment** – the prospective applicant identified a number of designated sites around the proposed development with qualifying interests,

including White Clawed Crayfish and Petrifying springs. Neither qualifying interest was found during survey work undertaken and it is proposed the site drainage design will protect downstream surface water. The prospective applicant also referenced alluvial forest and oak woodlands with no potential pathways for this receptor.

The prospective applicant informed the Board that GSI landslide susceptibility mapping will be referred to showing minimal depths of peat and the risk of landslide is predicted to be negligible.

- **Consultations** – the prospective applicant said Waterford County Council have been consulted in relation to the proposed development. No response has been received to date.
- **Application Pathway** – the prospective applicant enquired if the Board has decided on how best to proceed with the planning application to be lodged in respect of the instant development. The prospective applicant noted two possible options to proceed with planning, one application under Section 37A for the wind farm element and grid connection or two separate applications for the wind farm element under Section 37A and grid connection under Section 182A.
- **Project Duration** – the prospective applicant set out the benefits for removing conditions imposing a limited duration on the operation of wind farms and advised there is no legislative basis for such conditions. The prospective applicant stated the use of a decommissioning bond and detailed that a decommissioning plan could be agreed with the local authority.

Discussion

The following matters were discussed:

- The Board's representatives referred to recent precedent for the operational duration of a wind farm of 30 years (An Bord Pleanála reference ABP-304685-19). Reference was also made to the Draft Wind Energy Guidelines which state

that a time limit of approximately 30 years is reasonable. The Board's representatives stipulated that it is open to the prospective applicant to apply for open ended or fixed duration as it sees fit.

- The Board's representatives clarified if the electrical infrastructure proposed is an integral component of the Section 37 development application and not development in its own right, the Board believes it is reasonable to consider the proposed development collectively under one application. The prospective applicant advised the proposed grid connection is loop in and loop out and potentially others could use the line. The Board stressed it is the decision of the prospective applicant which application pathway to proceed with.
- The prospective applicant enquired if they could leave it open which application pathway they will proceed with or do they have to indicate which pathway the application will take prior to the Board making a SID determination when closing the pre-application consultation process. The Board's representatives said they will provide clarification on this matter at a further meeting if required.
- The Board advised the prospective applicant to set out and balance the carbon saving, taking into account the turbine construction phase through to operational phase and comparing the operational windfarm with baseline scenario and do-nothing scenario in the climate impact assessment in the EIAR. The Board also said it is useful to provide a figure and conclusion showing any improvement in term of carbon saving consistent with the format of other chapters in the EIAR.

Conclusion

The record of the meeting will issue to the prospective applicant and it will then be a matter for the prospective applicant to submit any comments on this if it wishes to do so. Following this, the prospective applicant may seek a third meeting or request closure to the pre-application process in writing. If closure to the pre-application is requested, the reporting inspector will complete the report and recommendation which will be

forwarded to the Board for determination. A copy of the procedures will be attached, and the decision will then issue to the prospective applicant.

Rachel Kenny

Director of Planning