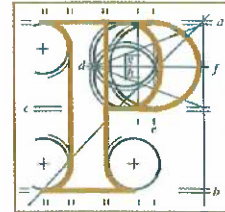


Our Case Number: ABP-314271-22

Your Reference: Knockanarragh Wind Farm Limited



**An
Bord
Pleanála**

Aislinn O'Brien
SLR Consulting Ireland
7 Dundrum Business Park
Dublin 14
D14 N2Y7

Date: 20th October 2022

Re: Proposed 52.8 MW Wind Farm including 8 no. turbines, Grid Connection and 110kv loop-in/loop-out electricity substation
Located approx. 1km southwest of Clonmellon and 1.6km northeast of Devlin, in Counties Westmeath and Meath

Dear Madam,

I have been asked by An Bord Pleanála to refer further to the above-mentioned pre-application consultation request.

Please find enclosed a copy of the written record of the first meeting of the 5th October, 2022.

If you have any queries in relation to the matter please contact the undersigned officer of the Board.

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

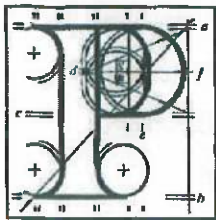
Doina Chiforescu
Executive Officer
Direct Line: 01-873 7133

PC07

Teil (01) 858 8100
Glaos Áitiúil 1890 275 175
Facs (01) 872 2684
Láithreán Gréasáin www.pleanala.ie
Ríomhphost bord@pleanala.ie

Tel (01) 858 8100
LoCall 1890 275 175
Facs (01) 872 2684
Website www.pleanala.ie
Email bord@pleanala.ie

64 Sráid Maoilbhríde 64 Marlborough Street
Baile Átha Cliath 1 Dublin 1
D01 V902 D01 V902



**An
Bord
Pleanála**

Record of Meeting ABP-314271-22 1st Meeting

Case Reference / Description	ABP-314271-22 Proposed 52.8 MW Wind Farm including 8 no. turbines, Grid Connection and 110kv loop-in/loop-out electricity substation, located approx. 1km southwest of Clonmellon and 1.6km northeast of Devlin, in Counties Westmeath and Meath		
Case Type	Pre-application consultation		
1st / 2nd / 3rd Meeting	1 st Meeting		
Date	05/10/2022	Time	11:00am – 12:10pm
Location	Virtually by Microsoft Teams		

Representing An Bord Pleanála
Staff Members
Stephen Kay, Assistant Director of Planning (Chair)
Máire Daly, Planning Inspector
Doina Chiforescu, Executive Officer
Representing the Prospective Applicant
Sawyer Charles, Statkraft
Aislinn O'Brien, SRL Consulting
Crystal Leiker, SRL Consulting
Edward Goulding, SRL Consulting

The Board referred to the letter received from the prospective applicant requesting a pre-application consultation 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.
- 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 gave a brief introduction to the prospective applicant company, Statkraft Ireland. It was noted that Statkraft Ireland has the most advanced wind and solar development pipeline of any developer in Ireland.

The prospective applicant provided the Board's representatives with an overview of the proposed development, which will consist of an 8-turbine wind farm development with in 2 no. clusters, with a combined output of 52.8 MWs, so above the 50MW threshold. The proposed turbines will have a height of c. 170m and a rotor diameter of 155m, each turbine has a potential to generate 6.6MW of power. The preliminary design will consist in 8 wind turbines, 3 no access tracks, turbine delivery route and internal substation. Also, internal electricity grid route and 110kV underground grid connection; the grid connection and substation form part of this application. The prospective applicant noted that an Environmental Assessment is currently ongoing, and they anticipate further design iterations to reflect this process.

The proposed turbine delivery route is to arrive from Dublin port, approaching the site from Mullingar and N52. It was stated that a TDR Assessment has been carried out and swept paths for all the node points along the route was completed and that no significant constraints have been identified. Regarding the grid connection, it was noted the proposed substation is located within the development site. The grid connection will access the existing 110 kV Overhead Line at Clonmellon via an underground cable along the public road. This connection is proposed via a width of 4.6 metres, encompassing two trenches of 0.6 m and required separation distance.

The prospective applicant stated that the proposed development would create employment opportunities relating to the construction, operation and decommissioning, totalling approximately 185 construction jobs.

The prospective applicant proposes to submit a NIS and an EIAR with the application which will include for an assessment of the connection to the national grid. Stated that, a suite of biodiversity enhancement measures will also be developed and implemented to take account of sensitive ecological receptors.

The turbines are to be in two adjacent clusters located approximately 1km southeast of Clonmellon and 1.6km northeast of Devlin in County Westmeath, with the western

boundary of the site immediately bound by the Meath County administrative boundary. The proposed site is bound to the east by the N52, a national primary road. The site is comprised of both private plantation forestry and native woodland, with the rest of the site made up of agricultural lands, there is also a quarry present on these lands. The River Stonyford and its tributary the D' Arcy crossroad streams form part of the western boundary of the site. A protected structure is also present on the site.

The prospective applicant gave a brief description for the proposed site access. Access to the Northern cluster is proposed via the N52 and the local road L5542 which passes through the townland of Carnybrogan, approximately 2 km southwest of the town of Clonmellon. The preferred access to the Southern cluster is proposed through a new access via the N52 within the townlands of Cavestown and Rosmead. An alternative Option for Access to the Southern Cluster is proposed via the N52 and the local road L5542.

In relation to potential effects on the receiving environment, the prospective applicant advised that a study area of 1 km surrounding wind turbines has been used to identify potential sensitive residential receptors. There are 126 residential receptors within the 1km buffer which will be assessed within the EIAR. A Zone of Theoretical Visibility study with an area extending to 20km around the site, was also taken into consideration. It was highlighted that ZTVs do not take into consideration vegetation cover, changing weather conditions or the mitigating effect of distance; therefore, this illustrates the worst-case scenario of visibility. Around 35 viewpoints will be used for the LVIA points locations, and these will be selected at sensitive receptor locations. A total of 10 key views in close proximity to the site have been captured to date for use in the design refinement process. The prospective applicant presented some photomontages with examples of five of these viewpoints.

In relation to potential effects on cultural heritage, the prospective applicant listed the national monument record assets and the national inventory of architectural heritage. Two key constraints were noted, listed under the CDP's Record of Protected Structures (Rosmead Gate: 009- 034; Rosmead House: 009-048). Both regionally important assets as categorised by the NIAH. Rosmead House was constructed in 1720, by the Wood family. It is a seven bay, four storey house, that is located within

designed grounds surrounding the Stonyford River. It is located within the site boundary, 250m to the south of Turbine 8. A full assessment of the protected structure and any potential impacts from the proposed development will be undertaken as part of the EIAR.

In relation to the European sites, the prospective applicant stated that there are a total of 9 SACs and 2 SPAs within 20 km. The closest SACs and SPAs are the River Boyne and River Blackwater SAC and SPA, Girley (Drewstown) Bog SAC, Lough Bane and Lough Glass SAC, and Lough Lene SAC. There are also 5 NHAs and 13 pNHAs within 20 km. The most proximate NHAs and pNHAs are Lough Shesk pNHA, Girley Bog NHA, and Aghalasty Fen pNHA.

The prospective applicant elaborated on the habitats and species for which the above sites are designated including. Annex 1 transition mire and quaking bogs (7140), alkaline fens (7230) and calcareous fens with *Cladium mariscus* and species of the *Caricion davallinae* (7210) in north and east and possible Ancient Woodlands of oak-ash-hazel woodland (WN2) of (mixed) broadleaved woodland (WD1) type in the south. Other habitat types across the site include conifer plantation (WD4), improved agricultural grassland (GA1), bog woodland (WN7), scrub (WS1), treelines (WL2), hedgerows (WL1), dry calcareous and neutral grassland (GS1), immature woodland (WS2), depositing/lowland rivers (FW2), drainage ditches (FW4) and eutrophic ponds (FL5).

The prospective applicant stated that bird surveys were conducted from May 2019 to September 2021 inclusive (three breeding seasons and two non-breeding seasons). Consultation with NPWS was undertaken by MKO in April and December 2019 and April 2020. Stated that the survey methodology and study area are in accordance with latest NatureScot (formerly SNH, 2017) guidance. This will provide the required two years of bird survey data collected in the last five years and data for one additional breeding season.

All Irish bat species (except lesser horseshoe) were recorded during surveys. Two minor summer roosts of common and soprano pipistrelle were recorded at the proposed development. Results of static detector surveys 2022 are pending.

Non-volant mammals as badger (setts near river Stoneyford, and in Ancient Woodlands), red squirrel and red fox recorded during surveys. Habitats suitable for pine marten, Irish hare, hedgehogs, Irish stoat, and otter. Invertebrates such as Marsh fritillary butterfly recorded in NW of proposed development. Suitable breeding habitat and larval webs confirmed. For reptiles and amphibians, a suitable habitat for common frog, smooth newt and common lizard was found. Amphibian results pending.

The aquatic results are pending (including results from electrofishing, eDNA, DNA metabarcoding, Q-sampling, white-clawed crayfish surveys and stage 1 and 2 freshwater pearl mussel surveys).

Regarding plants, no rare or protected species recorded by surveys to date. However invasive species including Japanese knotweed have been recorded outside the site and cherry laurel, and snowberry within or near to the proposed development.

The prospective applicant stated that the proposed wind farm is located within Boyne catchment (ID 07). The main hydrology features within and adjacent to the proposed wind farmlands are the River Stonyford (ID 07_220) and its tributary D'Arcy crossroad streams which forms the western boundary of the site. These features are part of the River Boyne and River Blackwater SAC (ID 002299).

The prospective applicant stated that the National Indicative Fluvial Mapping (NIFM) identifies an area of low-lying ground in the northern part of the site which may be liable to flooding and that a Stage 3 Flood Risk Assessment (FRA) is now underway. The FRA hydraulic model will identify the extent of the flood zones and flood depths at the site and will in turn inform the scheme design. The aquifer underlying the study area is classified by the GSI as Locally Important Aquifer (LI), which is bedrock which is moderately productive only in local zones. This refers to the Lucan Formation Calp bedrock of dark limestone and shale. The GSI shows the presence of localised eskers across the study area. These are not classified as aquifers and there is no gravel aquifer in the study area.

Regarding the evolution of the design, the prospective applicant stated that the project has gone through several design iterations over 2018, 2021 and 2022. These

iterations looked at variations in turbine number and tip height to deliver 50MW (2018: 12 no. turbine, 150m TH; 2021: 3 no. turbine, 200m TH; proposed: 8 no. turbines, 170m TH). The micro siting to account for Annex 1 habitat, Marsh fritillary butterfly, related breeding habitat, badger setts presence, ancient woodland, flooding, and proximity of adjacent national route. Further amendments expected as a result of the EIA process and public consultation.

Regarding the legislative and policy context for renewable energy, the prospective applicant referred to recent and significant proposals and updates, including the REPower EU Plan and the EU Green Deal. The prospective applicant also referred to the Climate Action Plan 2021 with its targets in respect of 2030 and 2050.

With respect to the national and local planning policy context (NPF & RSES), the prospective applicant noted that the Westmeath County Development Plan 2021-2027 came into effect in May 2021. The prospective applicant referred to several national policy objectives (21, 54, 55, RPO9) and energy policies objectives (CPO 10.139, CPO 10.140, CPO 10.141, CPO 10.142, CPO 10.143, CPO 10.144, CPO 10.146, CPO 10.147, CPO 10.148.).

The prospective applicant advised that the OPR considers policy objective CPO 10.132 to be contrary to government policy on wind energy development having regard to Ministerial guidance on wind farm development and in particular the inclusion of required separation distances between wind turbines and residential dwellings. The Planning Authority was requested to omit policy objective CPO 10.132 in its entirety from Chapter 10 of the CDP, however this request was not complied with, and a draft Ministerial Direction has been published for public consultation directing the removal of CPO 10.132 and related separation distances.

The prospective applicants noted a recent precedent case, Bracklyn Wind Farm, County Westmeath (ABP311565-21), whereby the Planning Inspector highlighted that on foot of this draft Ministerial Direction, it can be reasonably argued that the policy objective no longer forms part of the development plan on the basis that it does not sit comfortably with national policy in relation to increasing renewable energy capacity and with the guidance contained in both the 2006 Guidelines and the 2019 Guidelines.

With regard to the SID status of the proposed development, the prospective applicant highlighted the proposed total power output of the project (circa 52.8 megawatts) and stated its opinion that the proposed development would constitute strategic infrastructure. With regard to the criteria set out under section 37A (2) of the Planning and Development Act 2000, as amended, the prospective applicant stated its opinion that the proposed development would qualify as SID as it would be of strategic economic or social importance to the region in which it would be situated and would also contribute to the fulfilment of National and Regional planning objectives. The prospective applicant also noted the project is largely contained within the jurisdiction of Westmeath County Council; however, part of the grid connection will be located west of Clonmellon within the Meath County boundary. Therefore, contended that the proposed development would have a significant effect on the area of more than one planning authority.

With respect to consultation and community engagement, the prospective applicant said that an EIAR Scoping Report is due to be distributed in October 2022 to both statutory and non-statutory bodies. Consultations with the local communities are due to commence in Q4 2022. Consultation activities will be carried over two stages, stage one will include information website and leaflet drops, and stage two will include updated information website and door to door consultation. The prospective applicant advised of its current target to lodge a subsequent planning application circa Q1 2023.

Discussion/Queries

The Board's representative noted the detailed presentation delivered by the prospective applicant and raised a number of issues.

With regard to the development plan and policies relating to wind energy, the Board's representative advised the prospective applicant to address issues regard to the Ministerial Direction issued in any application and ensure that clarity is provided with regard to policy objective CPO 10.143 (not CPO 10.132 as stated on presentation).

In response to the Board's query on the matter, the prospective applicant said that there is no history of a large-scale commercial peat extraction on the subject site.

The Board's representatives enquired about the 80ha of private plantation and native woodland if the area will be affected. The prospective applicant said that there will be felling in this area and that they are in the process of identifying an indicative area for that felling and for the replacement lands. Stated that any felling would not involve any of the native or ancient woodlands. With respect to any tree felling required to facilitate proposed turbines, the prospective applicant said that this would be kept to a minimum and that appropriate mitigation (re-planting) would be applied.

Regarding the delivery route the Board's representative enquired about the 3 no. access points, there are a number of pinch points on local roads including narrow bridge crossings. The prospective applicant confirmed that these areas would be avoided as far as possible.

In response to the Board query on the matter, the prospective applicant gave a brief description of the two meetings held to date with Westmeath County Council involving representatives of the Planning and Roads departments. Stated that further follow up meetings regarding details of the access arrangements and works required for the delivery route are planned.

The prospective applicant stated that they have not engaged directly with TII to date. Stated that a meeting has been sought and on confirmation the applicant will prepare a specific information package for TII. The prospective applicant confirmed that there have been no public consultations to date.

Noting the location of the site in close proximity to the boundary with the Meath County Council administrative area, the Board's representative advised the prospective applicant to give consideration of visual impacts, landscape designations and any hydrological links that may impact on this local authority area. It was also advised that cumulative landscape and visual impacts with other permitted and constructed windfarms and developments in area (e.g. permitted SID case ABP 311565-21 for 9 turbines southeast of Devlin - Bracklyn Wind Farm) should be addressed as well as consideration of the impact on the setting of Rosmead House (RPS 009-048) – and adjoining arched gateway.

The Board representatives noted that the proposed access track to T1, T2, T3 is close to National monument WM00528 (Rath) and that there is a requirement for

assessment of the impact on these monuments and archaeological investigations. In addition, T5 is proposed in close proximity to WM00529 (enclosure/fort). The surrounding area is rich in archaeological remains including recorded monuments, applicant should address risks to archaeology in the area.

The Board representative advised the prospective applicant to give due consideration to European sites, proximate to the site include the River Boyne and River Blackwater SAC (Site Code: 002299). Noted that the site is sensitive to any impacts on aquatic environment as a result of run off, sediment, pollution etc. Noted that qualifying interest of this SAC include salmon, otter and river lamprey which rely on water courses nearby the proposed site.

The Boards representatives noted that the main areas of alkaline fen in this SAC site are concentrated in the vicinity of Newtown Lough which borders the proposed site and may be liable to impacts as a result of run off. In addition, Lough Shesk and Lough Freehan are also located within the immediate vicinity to the west of the site and are connected hydrologically via the Stoneyford River and field drains. Noted that any fluctuations in PH within this water system could have a detrimental impact on this habitat. The rare plant Round-leaved Wintergreen (*Pyrola rotundifolia*) occurs around Newtown Lough. This species is listed in the Red Data Book and this site represents its only occurrence in Co. Meath.

The Board also noted the provisions of the Water Framework Directive and the levels of risk to the current status of relevant waterbodies. Notably, STONYFORD_010 – at risk of failing to meet WFD objectives by 2027 and needs to be considered. Also, hydrogeological impacts will have to be addressed and how drainage on the site is to be implemented and monitored, given presence of potential hydrological links to nearby designated sites.

The Board's representatives advised that the Climate Chapter of the EIAR should adequately outline the carbon resources required to construct the proposed development and outline what the savings are by displacement of fossil fuel generated electricity. Figures could be calculated using a life cycle analysis with regard to materials and transportation.

Based on the information presented, the Boards representatives stated that it was their preliminary opinion that the proposed development was likely SID. Stated that the final determination regarding the SID status of the proposed development would however be made by the Board at the closure of the pre application process.

Given the anticipated time period for submission of an application and the ongoing consultations being undertaken by the prospective applicant, the Board's representatives recommended that the current pre-app case be kept open for the present time and said that a further meeting could be accommodated in respect of updates on the projects and feedback from stakeholders and relevant prescribed bodies. The prospective applicant queried whether the Boards representatives would be in a position to provide advice regarding design parameters for the purposes of the application and EIA as provided for under the Maritime and Valuation (Amendment) Act, 2022. In response, the Board's representatives noted that the relevant provisions of this Act had not yet commenced, and that implementing Regulations were required. The Board is therefore not currently prepared to implement this section of the legislation.

It was noted that the proposed grid connection and 110kv underground substation are intended to form part of the planning application and the Boards representatives recommended that this element should be considered in the EIAR from a cumulative effects perspective.

The prospective applicant indicated that it was likely their intention to seek an further meeting to discuss further planning and environmental considerations relating to the project.

Conclusions

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. It will be a matter for the prospective applicant to request a further meeting.

The meeting concluded at 12:10 p.m.

A handwritten signature in blue ink that reads "Stephen Kay". The signature is written in a cursive style with a horizontal line underneath the name.

Stephen Kay

Assistant Director of Planning