



An  
Bord  
Pleanála

## Record of Meeting ABP-315864-23 – 2<sup>nd</sup> Meeting

<b>Case Reference / Description</b>	ABP-315864-23 – Construction of up to 31 no. wind turbines (Tirawley Wind Farm), a permanent 110kV substation, 110kV underground cable and grid connection to the existing 110kV substation at Tawnaghmore Co. Mayo.		
<b>Case Type</b>	Pre-application Consultation		
<b>1st / 2nd / 3<sup>rd</sup> Meeting</b>	2 <sup>nd</sup> Meeting		
<b>Venue</b>	Virtually by Microsoft Teams		
<b>Date</b>	14/08/2023	<b>Time</b>	11:00am – 12:45pm

### Representing An Bord Pleanála

Stephen Kay, Assistant Director of Planning (Chair)

Jimmy Green, Senior Planning Inspector

Evan McGuigan, Executive Officer

### Representing the Prospective Applicant

Nicola O'Neill, Constant Energy

Paddy Hynes, Constant Energy

David Kiely, Jennings O'Donovan

Michael Garvey, Jennings O'Donovan

Darren Timlin, Jennings O'Donovan

Iain Douglas, Planning Consultant

Cian Doughan, Macroworks – LVIA Consultant

Richard Barker, Macroworks – LVIA Consultant
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John Whiteford, Whiteford Geoservices Ltd – Geotechnical Consultant
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## **Introduction**

The meeting commenced at 11:00am.

The Board's representatives referred to its previous meeting with the prospective applicant on 5<sup>th</sup> April 2023 and the record of this meeting. The Board's representatives asked if the prospective applicant had any comments it wished to make on the record of this meeting or questions; the prospective applicant replied that it did not.

## **Presentation by the prospective applicant**

The prospective applicant began its presentation with an update on changes made to the proposed development since the first meeting with the Board. It submitted that the proposed number of turbines had been reduced from c. 31 to 25 (21 of these turbines would have a 125m tip height and a 105m rotor diameter, with a rated generating capacity of up to 3.45MW per turbine, while the remaining 4 would have a tip height to 180m and a 150m rotor diameter, and a generating capacity up to 6MW per turbine). The combined total output of the turbines is estimated to be approximately 96MW. The prospective applicant also stated that a public consultation for the proposed development had been held in Ballina on 4<sup>th</sup> June 2023 and that a pre-application meeting due to be held with Mayo County Council on 8<sup>th</sup> August 2023 had been postponed but is intended to be rescheduled imminently.

The prospective applicant stated that more work had been done regarding the chapters for the Environmental Impact Assessment Report (EIAR). Regarding aquatic ecology, it submitted that Inland Fisheries Ireland (IFI) had requested to assess the impact of the proposed development on the aquatic habitat and that electrofishing and invertebrate sampling is scheduled for August 2023. Regarding soil and geology studies, it was stated that work had been completed for a walkover

survey, peat screening, peat stability assessment and borrow pit assessment. The prospective applicant further submitted that the haul route had been assessed – including focus on Palmerstown Bridge – and that the grid route had been further assessed with an option to connect to another existing substation at Killala.

The prospective applicant presented an updated layout of the proposed development, which has broadly remained consistent with that presented at the first meeting apart from the reduction in turbine numbers. The 4 largest turbines are proposed to be those located in the northernmost cluster of turbines.

Regarding landscape and visuals, the prospective applicant stated that its visual assessment is concentrated within a 20km study area as per the 2006 Wind Energy Development Guidelines. The northern extent of the proposed development is situated in Mayo County Council's Landscape Character Unit D – North Coastal Plateaux. The southern extent of the proposed development is located in Mayo County Council's Landscape Character Unit G – North Mayo Drumlins. It was submitted that the coastline is classified as a vulnerable area, while two small areas in the northern extent of the proposed development are classified as vulnerable skylines. In Sligo, the immediate coastline within the study area is also classified as visually vulnerable.

The prospective applicant stated that its assessment of visual impacts of the proposed development would include a range of notable receptors – including designated scenic views and routes (particularly along the coastline), tourism and heritage features (such as the Wild Atlantic Way and Downpatrick Head), local community views, and centres of population. It submitted that a visual impact assessment would include up to 30 viewing reference points and that cumulative assessment work would include all other existing and consented developments within the 20km study area.

Regarding soils and geology, the prospective applicant submitted that the lands upon which the proposed development would be built consisted of thin peat soils and glacial till mineral soils. The majority of the rock located on site consists of siltstone, shale and sandstone, with small portions underlain by limestone. The prospective applicant stated that a borrow pit located on site would be used for bulk fill, and that

some of the anticipated rock excavation from the proposed development could be used as construction fill.

The prospective applicant provided a description of the work it has undertaken with regards to peat analysis on the site of the proposed development. It submitted that the peat is of significance due to the potential for landslides in areas where peat blankets are thick and stated that a two-stage approach had been taken in terms of investigation – course analysis and detailed assessment. It further submitted that the preliminary assessment of this work had resulted in moderate to high-risk locations being removed from the turbine layout and that the proposed infrastructure layout is concentrated in areas considered as low risk in terms of peat stability. It also stated that peat and mineral spoil – and the extent of spoil repositories – had been minimised and that it was confident that the hazard risk arising from peat stability will be low with this proposed development.

Regarding the proposed haul route, the prospective applicant has identified two potential routes and provided a map indicating both – one from Killybegs Harbour to the site location and another from Galway Harbour to the site location. It submitted that an auto-tracking exercise had been completed on the Palmerstown Bridge crossing (located on both routes) and that 4 pinch points had been identified. It also submitted that a structural report has shown that the bridge is in good condition. The prospective applicant stated that it is liaising with landowners in relation to securing consents for any works required to facilitate turbine delivery. In relation to grid connection at this location the prospective applicant stated that it was exploring the option of directional drilling the underground electrical cabling under the bridge.

The prospective applicant provided a layout of the proposed grid connection from the site of the proposed turbines to the existing Tawnaghmore substation with an option to connect to the currently proposed Killala energy hub substation (this substation is subject to a current planning application with Mayo County Council – Pl. Ref. 23/60266 as part of a larger proposed development including a hydrogen plant and energy centre). The grid connection element of the proposed development would include an on-site 110kV substation at the site of the proposed wind farm and a 110kV underground cabling connecting to either the existing Tawnaghmore substation or the currently proposed Killala Energy substation (which is proposed at

a location a short distance to the north of the existing Tawnaghmore station). The proposed underground cabling would travel mainly along existing public roads, require an estimated 24 joint bays and cross 8 watercourses.

Regarding the turbines currently under consideration for use in the proposed development, the prospective applicant submitted that 21 turbines would be the Vesta V105 3.45MW model and 4 turbines would be the Vesta V150 6MW model. It stated that the Vesta V105 3.45MW model is the smallest turbine on the market and was selected to ensure adequate separation distances could be achieved from housing in the vicinity to ensure protection of residential amenity.

Regarding public consultation, the prospective applicant stated that a public event was held at Ballina Manor Hotel, Ballina on 4<sup>th</sup> June 2023 between 2pm and 7pm. It was stated that 38 people signed into this event and that the event presented a range of project information including three visual stands, as well as an interactive tablet which could provide 360-degree visuals so that the public could envision how the proposed development would appear on the landscape.

The prospective applicant provided information regarding the scale of maps it intended to provide for a full application for the proposed development. It also provided an estimated timeline for the submission of this application. In conclusion, the prospective applicant submitted that the proposed development does constitute a Strategic Infrastructure Development (SID) as it exceeds the 50MW threshold set out in the 7<sup>th</sup> Schedule of the Planning and Development Act 2000, as amended. It further submitted that the construction of a new 110 kV substation and grid connection constitutes a SID under Section 182A of the Act.

## **Discussion**

The following matters were discussed:

- The Board's representatives stated that based on the presentation from the prospective applicant, that the preliminary view remains that it is likely that the proposed development would constitute a SID case, under the provisions of the 7<sup>th</sup> Schedule and Section 37A(2) of the Planning and Development Act, 2000

(as amended) – but ultimately a final decision on this would be made by the Board.

- In response to a query from the Board’s representatives, the prospective applicant confirmed that the turbine models outlined in the presentation are the models they wish to proceed with and that turbine types will be clearly defined and fully assessed in any application.
- Regarding the postponed meeting with Mayo County Council, the prospective applicant stated that it is waiting to hear back from the Council for an alternative date and that it would forward on the minutes of this meeting when it happens.
- In response to a query from the Board’s representatives, the prospective applicant confirmed that the turbines that were excluded from the proposed development were primarily located in the central area of the site layout, with one of the excluded turbines located further to the south. It confirmed that ecology constraints, set back from residential properties, overhead lines, watercourse crossings, landowner constraints and peat constraints were considered in determining which turbines were excluded.
- Regarding landscape issues, the Board’s representatives noted that the turbines to the north of the proposed development are the largest and are the most exposed to scenic routes including the Wild Atlantic Way. The prospective applicant stated that these turbines would be visible from the coastal area but that the larger turbines were being proposed at these locations as they were the most distant from residential receptors. It was also opined that the main views from the scenic routes in this area were seawards and not in the direction of the proposed windfarm. When queried by the Board’s representatives in relation to potential landscape and visual impacts arising, the prospective applicant acknowledged that there could potentially be significant impacts arising regarding landscape, but that a full impact of significance had yet to be concluded.
- The Board’s representatives noted that several (approximately 13 no.) turbines remain outside of any areas designated as appropriate for the provision of wind turbines in Mayo’s Renewable Energy Plan/County Development Plan with only 3 no. turbines within an area designated as a “Priority” and the remainder located within or proximate to a Tier 1 zone (exact figures could not be provided

as the turbine locations were not mapped against an overlay of Mayo County Councils Renewable Energy Plan). The prospective applicant stated that all of this would be considered and discussed with Mayo County Council, and further submitted that some turbines had been removed on a visual basis. The Board's representatives advised that this issue would need to be investigated thoroughly and that the location of the turbines outside of the areas identified as acceptable in the wind energy strategy would need to be strongly justified in any future application.

- In response to a query from the Board's representatives regarding peat analysis, the prospective applicant stated that a wide variety of peat probing measures had been used and a significant amount of data had been collected. The Board's representatives advised to include as much information as possible regarding this into any future application – particularly in terms of peat management, side-casting and potential impacts on peat outside of the site. The prospective applicant stated that this would all be fully documented.
- The Board's representatives advised the prospective applicant to include as much information as possible regarding any proposed borrow pit and should it be located on the site of any previous extraction activities to be aware of the associated planning history and ensure any previous works were in accordance with the Act given the provisions of Section 34(12). The prospective applicant stated that some of the content of the borrow pit would be appropriate for construction fill, but that some rock would also need to be imported onto the site. It also submitted that there are no peat issues regarding the borrow pit. The Board's representatives also advised that any future application should provide comprehensive details in relation to alternatives considered in the design and any additional materials which need to be imported onto the site (e.g. volumes, traffic generated and any associated impacts).
- In response to a query from the Board's representatives, the prospective applicant stated that works in areas of deep peat will be avoided, and that the majority of infrastructure has been designed to avoid areas of deep peat. It was submitted that peat of over 2m can be susceptible to bog slides but that the proposed development will not have this problem and that there were no records of peat slides on the site. The prospective applicant also clarified that

there were no quaking issues on the site and confirmed that it is not envisaged that any floating roads would be required. The Board's representatives advised to include all information regarding alternatives into any potential application.

- The Board's representatives advised the prospective applicant to include all feedback and information regarding engagements with IFI as part of any future application. The fact that the IFI recommended that electrofishing be undertaken was noted.
- The Board's representatives advised the prospective applicant to include noise assessments for the two types of turbines it has proposed to use.
- In response to a query from the Board's representatives as to whether a location closer to the proposed development could have been chosen for the public consultation event, the prospective applicant stated that Ballina Manor Hotel was chosen due to venue and availability reasons.
- Regarding the proposed haul route, the Board's representatives advised the prospective applicant to address the issues concerning landowners' consent and include rationale concerning pinch points in any full application.
- The Board's representatives noted that the prospective applicant had mentioned section 182A of the Act in its presentation regarding the proposed substation and grid connection. They stated that the current consultations were opened and being processed under section 37A of the Act. Should the prospective applicant wish to have the electrical infrastructure considered under Section 182A it would be necessary to undertake a different pre-application consultation process under section 182E of the Act. The Board's representatives confirmed that the Board would not be able to issue a decision on pre application consultations under section 37B and section 182E in the one process and advised that the prospective applicant should take its own legal advice in relation to this issue.
- In response to a query from the prospective applicant, the Board's representatives stated that the Board have accepted full applications for wind farms and their associated grid connections following a pre-application process under section 37A but reiterated that the Board could not undertake the section 182E process under the current pre-application discussions as they are being progressed under Section 37B. Should the prospective applicant wish to pursue



the Section 182A process in relation to the electrical infrastructure, it would necessitate opening of additional pre-planning discussions under Section 182E – the Boards representatives advised that should this be required such discussions would be expedited and co-ordinated with the current pre-application discussions. The prospective applicant stated that it would take this into consideration going forward.

- The Board's representatives advised the prospective applicant that it may wish to wait until engagement with Mayo County Council is completed, as well as finishing its landscape and visual assessment to ensure it is satisfied with the final layout, and/or until it investigates the section 182 issue further before closing off consultations but acknowledged that ultimately that is a decision for the prospective applicant to take. Should further amendments to the proposed development be required, these should be submitted along with any close-out request or could form the basis of a further meeting at the prospective applicant's request.
- The Board's representatives advised the prospective applicant to include all information regarding ecological constraints and engagements with the National Parks and Wildlife Service in any future application. They noted that while detailed discussions on the ecological sensitivities of the site have not formed part of the pre-application discussions to-date, that any future application should provide comprehensive information in relation to the site ecology and any appropriate assessment requirements.
- The prospective applicant asked if the scale of maps it intended to provide for a full application for the proposed development were appropriate. The Board's representatives said that they appear acceptable albeit, detailed layouts are not yet available, and advised the prospective applicant to contact the administration team prior to submitting if they have any further queries in this regard.
- Regarding drawings, the Board's representatives advised the prospective applicant to bear in mind the recent Derryadd judgement (Sweetman v An Bord Pleanála) from the High Court.

## **Conclusion**

The record of the meeting will issue in due course and the prospective applicant can submit any comments it may have in writing or alternatively bring any comments for discussion at the time of any further meeting. The onus is on the prospective applicant to either request a further meeting or formal closure of the pre-application consultation process.

The meeting concluded at 12:45pm.



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**Stephen Kay**

**Assistant Director of Planning**