



An
Bord
Pleanála

Recording of Meeting ABP-318372-23

Case Reference / Description	Proposed 77MW Wind Farm of up to 11 No. Turbines, Grid Connection, Turbine Delivery Route and 110kV Electricity Substation with Battery Energy Storage, Co. Mayo		
Case Type	Pre-application consultation		
1st / 2nd / 3rd / 4th Meeting	1 st Meeting		
Date	25/01/2024	Start Time	11.00am
Location	MS Teams	End Time	12.05pm

Representing An Bord Pleanála
Stephen Kay, Chair
Alaine Clarke, Senior Planning Inspector
Lauren Murphy, Executive Officer

Representing the Prospective Applicant
Sean Galvin, RWE Renewables
Cliona O'Sullivan, RWE Renewables
Michael James, RWE Renewables
Ashlin O'Brien, SLR Consulting
Gerald O'Reilly, SLR Consulting
Edward Goulding, SLR Consulting

Introduction

The Board referred to the letter received from the prospective applicant on the 2nd November 2023, requesting pre-application consultations under **Section 37B** of the Planning and Development Act 2000, as amended, 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 that it wished to receive advice on from the Board. The Board's representatives mentioned the following general procedures in relation to the pre-application consultation process:

- 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 in any legal proceedings.

Presentation made by the prospective applicant:

The prospective applicant began the presentation by outlining the agenda. The prospective applicant's company is RWE Renewables (Ireland) Ltd, and the agent is SLR Consulting.

The prospective applicant introduced their company. RWE has been in Ireland since 2016 and are responsible for 2,000MW of onshore and offshore projects in development in Ireland. RWE currently have 1 project in operation and over 12 in development.

The prospective applicant outlined the key elements of the proposed development. This includes a thirteen-turbine wind farm development proposed within two clusters. Each proposed turbine has the potential to generate 5-7MW of power which totals to an output of 65-91MW overall depending on the final design option developed. Each turbine is proposed to have a tip height between 179m – 180m and a rotor diameter of 149m to 155m, with a hub height of between 102.5m and 105m. The prospective applicants stated that it was their intention to enter consultations with the Board regarding a design flexibility opinion under Section 37CC of the Act.

The preliminary design of the proposed development includes 13 wind turbines, access tracks, a turbine delivery route, internal substation, internal electricity grid route and 110kV underground grid connection. The prospective applicant stated that their environmental assessment is currently ongoing, and they expect to have further design iterations to reflect this.

The duration of the proposed development is 10-year planning permission with an operational life of 35 years.

The prospective applicant provided a brief overview of their evolutions of design. The proposed development has gone through two design iterations. The initial designs we based on maximising the potential wind take for the overall study area. This design included the development of the lands to the west of the study area. After an internal consultation and consideration of wind resource data this design has now been revised to a 13-turbine layout.

The prospective applicant discussed the economic importance of this proposed development. The proposed windfarm will help to achieve a more affordable energy market and contribute towards sustainable energy targets. It will also provide a community fund calculated in accordance with the Renewable Electricity Support Scheme (RESS). Information presented indicates that the proposed development has potential to generate up to approximately 263,063 MWh per year which could power around 62,634 homes (92% of households in county Mayo) and would create 286 direct jobs for the life cycle of the project.

The prospective applicant stated the proposed application site is quite a compact area. It is approximately 3km northeast to southwest, and the turbines are proposed to be located within two clusters. The study area boundary is located 0.5km from the village of Gweesalia. Bangor Eris is located approximately 7.5km from the proposed site. Oweninny Wind Farm is the closest operational wind farm to the study and is located approximately 25km Northeast of the site.

The prospective applicant gave a brief overview on the environment of the proposed development site. The proposed site is an open environment, there are no rare or protected plants recorded to date, but surveys are still ongoing. The prospective applicant aims to have all studies completed over the coming months and prepare a Natura Impact Statement (NIS). All wind farm turbines will be located no less than 50m from any watercourse or open body of water on the site and no construction activities will take place within 50m of the watercourses. The flood risk on the proposed site has been identified as low. The prospective applicant stated that there are no unauthorised developments within the study area and there is one monument located within the proposed development site.

The prospective applicant stated that the study area for the proposed development site at Muingmore is located within Policy 2, which is a low land coastal zone. A site visit was carried out in June of 2023 by Macroworks who are carrying out the Landscape and Visual Impact Assessment (LVIA) for this proposed development. During this visit they carried out a visual analysis using wireframe montages at 16 representative views throughout the study area. From the site visit carried out it was noted that the site features a mix of sensitive elements like coastlines, uplands, and

other elements such as conifer forests, bogland and farmland. The extensive conifer plantations and the bogland help blend the turbines into the landscape.

The prospective applicant discussed the viewpoint locations which were used during the landscape and visual impact assessment. There are currently 14 viewpoints located across County Mayo which take into consideration numerous sensitive receptors and key views of the proposed development. The prospective applicant stated that they will consider impacts on recreational and touristic landscape views.

The prospective applicant gave a brief overview of the noise study carried out. It was noted that there are no residential receptors within the study area and a minimum set back of 720m from residential properties has been applied. The baseline noise monitoring was completed in May 2023. A noise impact assessment will be submitted as part of this application.

The prospective applicant presented a drawing showing national heritage located near the study area. The nationally designated areas which are adjacent to the proposed development area include, the Trista Bog, which is a Natural Heritage Area, Mullet/ Blacksod Bay Complex which is a Special Area of Conservation, other important habitat features include blanket bog.

The prospective applicant gave an overview of the habitat mapping and surveys which have been completed across the study area. These include, 2 years of bird surveys, 2 years of bat survey, habitats mapping, terrestrial surveys, peat probing and physio chemical water sampling.

The prospective applicant stated that the proposed site is located within the Blacksod – Broadhaven water catchment area. They provided a table which identified the water quality status for sub catchments in the area. The Catchment Flood Risk Assessment and Management (CFRAM) and National Indicative Fluvial Mapping (NIFM) indicative flood maps show the proposed development site is at low risk of flooding. The groundwater vulnerability in the proposed development site is moderate and just outside of the site is low. The groundwater permeability on the site is classified as moderate.

The prospective applicant presented a drawing and briefly discussed the land, soil, and geology in and around the proposed development site. The study area is a mix of wet heath and conifer plantation. In phase 1 and 2 of this study, peat probing was carried out and the study area is subject to further ground investigation work. A peat landslide hazard risk assessment report will be carried out and used to inform the final scheme layout and design. There are no county geological heritage sites on or near the study area.

An archaeological walkover of the proposed development site was carried out in May 2023. The proposed application will be accompanied by a robust archaeological assessment. It was noted that the wider landscape has a moderate level of prehistoric activity. There are seven recorded archaeological monuments located in surrounding areas but just one located within the study area. Two crannogs were recorded within the study area, and another recorded in the surrounding boundary of the study area. All infrastructure will avoid all known assets on the site.

The prospective applicant discussed the traffic management survey carried out using automatic traffic counters placed in three separate locations. The automatic traffic counters were in place for approximately a week. The prospective applicant presented a drawing where each automatic traffic counter is located. Location 1 was on a section of the N59 approximately 1.6km from the junction with the R313 in the eastbound direction. Location 2 was on a section of the L1206 approximately 1.2km southwest of Mount Jubilee and 900m south of Trista. Location 3 was on a section of the track road approximately 2.4km southeast of Muingmore. Initial results found that there were low traffic levels on the central spine road.

The prospective applicant discussed the turbine delivery route. As of now the turbine delivery route is expected to be brought in through the port of Killybegs. The prospective applicant outlined the discussed turbine delivery route which will travel on roads such as the R263, N56, N15, N4, N59, R313 and following L1206 to the local access road of the proposed development site.

The prospective applicant discussed the grid connection route in relation to the proposed development. The grid connection route will be constructed in public roadways. On the proposed site there will be collector cables that connect each

turbine to the central substation. The central local spine road will lead to L1206 and following back up on the R313 at Bangor Erris. The grid connection cable will then follow the N59 to Bellacorrick Substation which is approximately 25km from the proposed development site. It is intended that the grid connection would form part of the overall application.

The prospective applicant discussed the Planning and Development Act 2000 (as amended) and stated that they believe the proposed development comprises strategic infrastructure as per the provisions of the Seventh Schedule of the Act.

The prospective applicant provided a summary of local, regional, and national policies that would apply to the proposed development. This includes the Mayo County Development Plan 2022-2028 and the strategic objectives, the Planning and Development Bill 2023 which is intended to be enacted by Q4 of 2024 and the Renewable Energy Directive III, which aims to increase EU's renewable energy by 42.5% by 2030. The prospective applicant briefly discussed the Climate Action Plan 2024 and its support for renewable energy.

The prospective applicant stated that this application will include an Environmental Impact Assessment Report and a Natura Impact Statement. The prospective applicant provided a summary of the surveys and studies that are currently undergoing in relation to the EIAR and the NIS.

The prospective applicant provided a summary of their public consultations to date. They have a designated community liaison officer to discuss any issues or concerns raised by members of the public. They have carried out community consultations within the local area. They engaged with Mayo County Council in December 2023, and their consultation with the National Parks and Wildlife Services is currently underway. They are also intending to have a consultation with the Transmission System Operator which is EirGrid in the coming weeks / months.

The prospective applicant concluded their presentation with an overview of the next steps which will be undertaken as part of preparing this application. They intend to lodge an application to An Bord Pleanála in Q4 of 2024.

Discussion:

- The Board's representatives began the discussion by referring to the prospective applicant's original letter requesting consultation to the Board. They noted that this letter references a battery storage element to the proposed development which was not mentioned in the presentation. The Board's representatives queried if battery storage is still intended to make up part of the proposed development. The prospective applicant stated that the battery storage element is intended to be a part of the development and its intention that it would be included in the proposed application.
- The Board's representatives queried if the prospective applicant had an estimate of how large the battery storage element of the project would be. The prospective applicant stated that they are unsure as they are still currently analysing options, but that this will be clarified in the coming weeks/months. It was stated that the battery storage part of the project would be ancillary to the windfarm and that the capacity of the battery storage was not intended to be more than the output of the windfarm.
- The prospective applicant questioned if the Board would need definitive confirmation of the size of the battery storage element of the development when closing out the pre-application consultation. The Board's representatives stated that it does not need to be exact, but a rough indication should be provided.
- The Board's representatives raised a question in relation to slide 6 of the presentation which states that it is intended that the grid connection and substation would form part of the application. It was noted by the Board's representatives that the cover letter submitted to the Board requesting a pre-application consultation is requested under Section 37B with reference in brackets to section 182E of the Planning and Development Act 2000 as amended. The boards representatives clarified that this pre application consultation is being held under section 37 of the act and that the opinion

issued would relate to s.37 of the Act. The applicant stated that they are willing to go ahead with this pre application consultation under section 37.

- The Board's representatives highlighted that while there is precedent for the Board to accept applications for development comprising windfarm and grid connection infrastructure under s.37, there was less clarity around the inclusion of battery storage as part of an application under section 37. Reference was made by the Board's representatives to instances where battery storage elements of windfarm projects were made to the local planning authority in the first instance. The Board's representatives indicated that they would give the issue of the scope of the application, and specifically the inclusion of battery storage, further consideration and revert to the prospective applicant on the issue. The Board's representatives also indicated that they may seek the views of the Board on the issue.
- The Board's representatives stated that the wind energy strategy has been incorporated into the *Mayo County Development Plan 2022*. The Board's representatives queried if the proposed development falls under tier one of this strategy. The prospective applicant clarified that this was the case.
- The Board's representatives asked what were the implications for wind energy of the visual policy set out for the area in the development plan. The prospective applicant stated that there is guidance within the plan, but a Landscape and Visual Impact Assessment will be carried out to assess the full impacts. The Board's representatives noted that any application would need to include a detailed visual assessment and justification for the development in visual terms in light of the landscape and visual policies in the Plan and should not rely excessively on the fact that the area is identified a location where wind energy is identified as normally acceptable under the Wind Energy Strategy.
- The Board's representatives queried what consultations had been undertaken with NPWS and Mayo County Council in relation to bat and bird surveys and

when are they intended to be finalised. The prospective applicant said that they are closing out as soon as possible.

- The Board's representatives notes that the applicant stated that the proposed site is in a flood zone C, on that mapping it seems that there may be potential flooding across a section of the site to the northwest. The prospective applicant stated that that area is within the Annex I Habitat and there is no proposed development at that location.
- The Board's representatives discussed surface water categories, status and risks with respect to the Water Framework Directive and advised the prospective applicant to have regard to the Transitional and Coastal (TRAC) data, that Tullaghan Bay is connected via the Trista and is 'under review'. With respect to rivers, it was noted by the Board's representatives that Doolough Stream is 'at risk' with agriculture and extraction indicated to be significant pressures.
- The Board's representatives queried the history of the proposed development site. The prospective applicant stated that the industrial units located in the area are excluded from the proposed development site. In terms of extraction in the area the prospective applicant is unaware of any unauthorised extraction on the proposed site.
- The Board's representatives questioned the prospective applicant on if they have a figure/ percentage of the forestry in the area which may be removed. The prospective applicant stated that they do not yet have an exact figure or percentage.
- The Board's representatives queried if any issues have been raised in relation to the bird and bat surveys which have been carried out. The prospective applicant stated that their ecology team have not yet raised any significant issues and they are satisfied with the results to date.

- The Board's representatives questioned if the prospective applicant is considering any recreational amenities in or around the site for members of the community. The prospective applicant stated that they aim to improve the quality of the area rather than providing specific recreational facilities. The prospective applicant stated that during community engagement they will take into consideration the opinions of members of the community in relation to amenities in the area.
- The Board's representatives asked the prospective applicant to discuss the grid connection once again. The prospective applicant gave a run down on the grid connection and that it will be sited within public roads, as EirGrid have stated they want all infrastructure, if possible, to be located within the public domain rather than on private land. The Board's representatives highlighted the importance of consulting with the Roads Section of the local authority regarding the proposed grid connection.
- The Board's representatives highlighted the Special Area of Conservation located to the South of the proposed grid route connection, along the N59. The Board's representatives noted that there were no specific conservation objectives for this site and recommended that the prospective applicant looks at similar European Sites with relevant qualifying interests to inform their Natura Impact Statement.
- The Board's representatives recommended that the prospective applicant includes details in relation to major accidents as part of their environmental impact assessment report.
- The Board's representatives gave their preliminary opinion that based on the information provided in the presentation today in relation to this proposed development it is likely that this falls within the scope of Strategic Infrastructure Development.

- The Board's representatives asked if the prospective applicant has any queries, they wish to raise in relation to the design flexibility aspect of the application. The prospective applicant questioned if it falls under a separate process to a pre-application consultation held under section 37B. The Board's representatives clarified that the design flexibility aspect will be a separate application, a separate file and a separate ABP reference number.
- The prospective applicant questioned if the pre-application consultation can be concluded before the design flexibility request has been submitted to the Board. The Board's representatives gave their preliminary view that the design flexibility request must be made while the pre application consultation under section 37B is still live.
- The prospective applicant queried if the design flexibility only related to physical elements of the proposed development, to which the Board representatives affirmed that it did.

Conclusion:

The Board's representatives advised that the onus is on the prospective applicant to either request a further meeting or formal closure of the instant pre-application consultation process. The Board's representatives advised that the record of the instant meeting will be issued in the meantime and that 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 Meeting concluded at 12.05pm.



Stephen Kay

Assistant Director of Planning