An Bord Pleanála

Record of Meeting
ABP-318971-24

Case Reference / Description	Proposed 10 no. wind turbines with a maximum height of 185m and expected capacity export of circa 57MW to 66MW, including an underground cable connection to the national electricity grid, turbine delivery route and battery energy storage system Flexibility Opinion located in the Townlands of Brittas, Rossestown and Clobanna, near Thurles, Co. Tipperary		
Case Type	Pre-application consultation		
1st / 2nd / 3rd / 4th Meeting	1st Meeting		
Date	01/03/2024	**Start Time**	2:30pm
Location	MS Teams	**End Time**	3:50pm

Representing An Bord Pleanála
Stephen Kay (Assistant Planning Director) Chair
Paul Caprani (Assistant Planning Director)
Alaine Clarke (Senior Planning Inspector)
Lauren Murphy (Executive Officer)

Representing the Prospective Applicant
Aine Ryan, MWP
Ken Fitzgerald, MWP

Paddy Curran, MWP
Eamon Hutton, Orsted Project Manager

Introduction

The Board referred to the letter received from the prospective applicant on the 1st February 2024, requesting pre-application consultations under section 37CC 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 may at any time conclude the consultation where it considers appropriate to do so. Following the conclusion of the consultation the Board will issue an opinion regarding the design options as set out under section 37CD of the Act. Any opinion issued will not be available for public inspection until an application for permission is made to the board.
- It is the Board's interpretation that the flexibility meeting process allows for only one meeting and so a further meeting will not be held.
- 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 going through the meeting agenda.

The prospective applicant provided an overview of the project timeline for the proposed development. They are intending on closing the pre application consultation process in March 2024, following the closure they intend to submit their planning application to An Bord Pleanála.

The prospective applicant provided a breakdown of the proposed development. The proposed development will consist of 10 wind turbines with an export capacity of between 57MW and 66MW. The proposed development will also consist of 1 permanent Lidar unit, a 110kV substation, a battery energy storage system, a grid connection from the proposed site to existing Thurles 110kV substation and accommodation work for the turbine delivery between the Port of Foynes and Brittas Wind Farm site.

The prospective applicant discussed the proposed site location, which is located just North of Thurles, County Tipperary. The prospective applicant presented a drawing where the site and folio boundary were highlighted in red.

The prospective applicant presented the proposed development site in four different sections. Section A of the proposed development site has four wind turbines located on this site off the central spinal road which runs through the proposed site. Section A also includes a spoil deposition area, lidar unit and temporary site compound. Section B is proposed to have two wind turbines and a spoil deposition area. Section C is proposed to have three wind turbines and a temporary site compound, and section Dis proposed to contain one wind turbine, a spoil deposition area, the proposed 110kV substation and battery energy storage unit.

The prospective applicant stated that they are still unsure of which turbine type will be used in the proposed development and that they have identified prospective turbine designs which have various attributes. These various attributes include hub height, rotor diameter, blade length, export capacity, and hardstanding area at the base of each wind turbine.

The prospective applicant discussed the need for flexibility in the project design. They stated that the turbine model is still unconfirmed, but they have identified three possible options with different dimensions. The prospective applicant stated that procurement of the turbines will not take place until the planning process is complete and preconstruction planning begins.

The prospective applicant presented a drawing of the three proposed turbine designs. All three turbine designs have the same tip height but vary in rotor diameter, hub height and blade length.

The prospective applicant presented a drawing of the hardstanding areas located at the base of the turbines for all three proposed design options.

The prospective applicant discussed and compared all three potential turbine designs. The first design option has a tip heigh of 180 meters, a rotor diameter of 150 meters, a hub height of 105 meters, a blade length of 73.7 meters and a max export capacity of 6MW.

The second proposed turbine design has a tip height of 180 meters, a rotor diameter of 155 meters, a hub height of 102.5 meters, a blade length of 76 meters and a max export capacity of 6.6MW.

The third proposed turbine design has a tip height of 180 meters, a rotor diameter of 149 meters, a hub height of 105.5 meters, a blade length of 73 meters and a max export capacity of 5.7MW.

The prospective applicant stated that during the period between planning and procurement there is a possibility that the max export capacity may increase due to advanced technology. The prospective applicant provided an example of the model evolution of Turbine model V150 which has advanced from a maximum export capacity of 4.2 MW to the current 6 MW.

The prospective applicant stated that the various design options will be discussed and evaluated in the environmental impact assessment report. Each turbine design will be assessed for noise, landscape and visual assessment, shadow flicker, turbine delivery route, ecology, hydrology, land and soil, archaeology and air and climate,

although the LVIA compare the various options and asses the option of the greatest extent, and transport will compare each delivery option and assess the option with the greatest blade length.

Discussion:

The Board's representatives began the discussion by mentioning that everything in relation to design flexibility must be presented and discussed at this meeting as there will be no further meetings under section 37CC.

The Board's representatives noted that the prospective applicant presented three different proposed turbine designs, which vary in tip height, blade length and hub height (the details in respect of which flexibility is sought). Once the board provided their design opinion this will allow the prospective applicant to have flexibility with these details and to note that they won't be restricted to the dimensions relating to these details as set out in the request.

The Board's representatives asked for clarity on the drawings presented in relation to the proposed hardstanding areas of each turbine. The prospective applicant clarified that these drawings were provided by the manufacturer as each hardstanding area has different installation techniques and laydown requirements.

The Board's representatives gave their preliminary opinion that, based on the circumstances set out in the request, the rotor diameter, blade length, hub height and hardstanding areas of the three proposed turbine designs would be accepted as details in which design flexibility would be agreed to. The Board's representatives reminded the prospective applicant that the final decision lies with the Board.

The Board's representatives stated that the maximum export capacity may not be considered a flexible design detail as it is an output of the other details in respect of which flexibility is sought but this will be clarified in the final opinion issued to the prospective applicant.

The prospective applicant raised a query in relation to the specifics of the design flexibility opinion, in particular they questioned if the final conclusion of the design

opinion will state that the prospective applicant has flexibility or if it will state specific flexibility requirements. The Board's representatives stated that the final opinion will state that the prospective applicant has or has not been granted design flexibility in respect of the specific details for which flexibility was sought but no specific requirements or dimensions will be referenced.

The Board's representatives also noted that the Board can pick and choose different aspects of the design flexibility request to grant design flexibility with other aspects omitted.

The Board's representatives noted that the prospective applicant is requesting flexibility on five elements of the proposed development. These elements are the rotor diameter, hub height, blade length, hardstanding area and the maximum export capacity. The Board's representatives stated that as mentioned in section 37(CD) the Board shall as soon as practicable consider all information presented in the pre application meeting and issue their design flexibility opinion.

The Board's representatives clarified that the design options are not restricted to the three presented design options. Rather, what is required is that the prospective applicant provides an undertaking that in respect of each detail for which flexibility is sought that they will at the time of making an application provide two or more options, parameters or a mixture of options and parameters in respect of each detail.

The Board's representatives advised the prospective applicant that although they can submit comparison drawings of all design options presented, they must submit individual drawings of each design option as part of the planning application.

The Board's representative's recommended that the applicant should take into consideration environmental risks and factors in relation to all design options when carrying out studies to form part of the Environmental Impact Assessment Report.

The prospective applicant raised a query in relation to layout drawings. Specifically, they asked whether given that all three proposed design options have different hard standings, would they have to provide a separate layout drawing for each design option. The Board' representatives recommended that they provide a separate drawing for each design.

The Board's representatives asked the prospective applicant if there are any other aspects of design flexibility they wish to present and discuss in this meeting other than those presented in the request under section 37CC. The Board's representatives specifically noted that in the pre application consultation meeting under section 37B (ABP-315655-23) the prospective applicant stated that grid connection options were still being discussed.

In response, the prospective applicant stated that they may require design flexibility on smaller details of the proposed substation to be in line with EirGrid standards which may be changed between the time of planning and procurement. The Board's representatives asked the prospective applicant to clarify what these potential changes may be. The prospective applicant gave examples such as building extensions, additional above ground elements or additional space area for expansion for requirements.

The Boards representatives sought clarification from the prospective applicant as to whether it was intended that the grid connection and substation element of the proposed development were intended to be included as part of the s.37 pre application consultation or if these elements would be the subject of a separate application under s.182. The Boards representatives noted that this issue had not been discussed at the initial pre application consultation meeting held under ABP-315655-23. In response, the prospective applicant indicated that it was likely that these elements of the project (grid connection and substation) would be applied for under s.182 of the Act.

On foot of this response, the Boards representatives noted that if the prospective applicant submits a separate application under section 182 for the proposed grid connection and the substation, then any flexibility request related to the proposed substation will need to be submitted as a design option flexibility request under section 182 (Section 182F). The Board's representatives advised the prospective applicant that it is their choice in what way they wish to present their application to the Board based on their own legal advice.

The prospective applicant raised a query in relation to the battery storage system element of the proposed development. They noted that due to fast changing

technology from the time of application to procurement of the proposed development the configuration of the battery storage element may be updated or change, and they queried if this be put forward as an element of the design flexibility. The Board's representatives reminded the applicant that this is a design flexibility opinion request under section 37CC and that the proposed battery storage was located adjoining the substation which it was indicated would be submitted under section 182 and therefore that any request for a design opinion should be part of a consultation under s182A.

The Board's representatives also questioned if the battery storage system element was mentioned in the original s.37B pre application consultation meeting held with the Board (ABP-315655-23). The prospective applicant stated that they had not yet finalised the design of the battery storage unit at this stage. The Board's representatives indicated that for the reasons outlined above the battery storage element would not be captured under section 37 and any design flexibility related to this aspect of the project did not therefore come under the current request for a design flexibility opinion.

The Board's representatives questioned if the prospective applicant intends to meet with the Board again for another pre application meeting for the pre application consultation (ABP-315655-23). The prospective applicant stated that they can provide the Board with the final details and request closure of the pre application consultation.

The Board's representatives requested that the prospective applicant clarifies the exact nature of the project such as ancillary development, number of turbines and maximum export capacity of the wind turbines when requesting closure of the pre application consultation under ABP-315655-23.

The Board's representatives advised the prospective applicant that it is their intention to get the Board's opinion for the pre application consultation and the design flexibility request issued at the same time.

The Meeting concluded at 15:40

Stephen Kay. 3.11.2024.

Stephen Kay

Assistant Director of Planning