An Bord Pleanála

Inspector's Report

ABP-313707-22

Development	Proposed Fully Integrated Wind Energy Generation & Storage Development & 110 kV Substation
Location	Doolough, Glenmore and Cahermurphy, Co. Clare
Planning Authority	Clare County Council
Prospective Applicant(s)	Whitebeam Renewables Limited
Type of Application	SID Pre-Application Consultation under 37E
Date of Consultation Meeting(s)	08/07/2022, 16/09/2022
Date of Site Inspection	05/07/2022
Inspector	Conor McGrath

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1.0 Introduction

The Board received a request on 2nd June 2022 from Whitebeam Renewables Limited to enter into pre-application consultation under Section 37B of the Planning and Development Act 2000, as amended, in relation to a proposed development in the townlands of Doolough, Glenmore and Cahermurphy, Co. Clare, comprising a wind energy development of 6 turbines, 110kV substation and an integrated battery storage facility (BESS).

This report provides an overview of the proposed development, relevant precedents and legislative provisions and recommends that the proposed development does not constitute strategic infrastructure. Two pre-application consultation meetings were held in respect of the proposed development on 08/07/2022 and 16/09/2022 and the prospective applicants made two further written submissions to the Board subsequent to these meetings.

2.0 Site Location and Description

The site for the proposed development is located in the townlands of Doolough, Glenmore and Cahermurphy, Co. Clare, approximately 4.5km north of Kilmihil and 20km southwest of Ennis. The lands lie to the south of Doo Lough, to the west of the existing Booltiagh Wind Farm and to the east of Cahermurphy 1 Wind Farm.

The lands are relatively elevated, being situated on a low ridge running approximately west-east at an elevation of up to 212m OD. The lands are a mixture of forestry plantation, active peat extraction and rough grazing. Cragnashingaun Bogs NHA lies to the immediate west of the subject lands. The lands are accessed from the public road to the south via a farm road which serves two dwellinghouses, and associated yard areas. The Moneypoint - Oldstreet 400 kV overhead line traverses part of the site, running in a northeasterly direction, while a 110kV line runs east-west along the southern section of the site, parallel to the public road.

3.0 Proposed Development

The proposed development is described as a fully integrated Wind Energy Generation & Storage Development & 110 kV Substation. The development will

comprise 6 no. wind turbines with an output of 30 megawatts (MW) (6 x 5MW). An integrated battery storage system, with a storage capacity of at least 30MW, will provide for the release of stored wind energy in addition to the output of the wind turbines, as demand requires. This provides for a Maximum Export Capacity (MEC) of 60MW for the project. An on-site 110kV substation will be connected to the National Grid via an overhead looped line to the existing 110kV overhead network to the south.

The submitted documentation identifies the following components:

- Wind turbines, foundations and hardstand areas
- On-site access roads
- On-site interconnecting electrical cabling
- An on-site 110kV substation
- A fully integrated battery energy storage facility
- Meteorological mast
- Borrow pits and peat storage areas

Off-site project components:

- Turbine component haulage route
- Replacement forestry lands
- Grid connection – looped overhead line or underground cable to the existing overhead line network.

4.0 Planning Policy Context

4.1. National Planning Framework 2018

National Strategic Outcome 8 refers to: Transition to a Low Carbon and Climate Resilient Society.

Chapter 9 is titled Realising our Sustainable Future.

National Policy Objective 52: The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation and the sustainable management of our natural capital.

Ireland's national energy policy is focused on three pillars: (1) sustainability, (2) security of supply and (3) competitiveness. Ireland must reduce greenhouse gas emissions from the energy sector by at least 80% by 2050, compared to 1990 levels, while ensuring security of supply of competitive energy sources.

A transition to a low carbon energy future is noted to include a requirement to shift from predominantly fossil fuels to predominantly renewable energy;

National Policy Objective 55 promotes renewable energy use and generation.

4.2. National Development Plan 2021-2030

The National Development Plan sets out investment priorities underpinning the implementation of the National Planning Framework.

Section 3.7 Investing for low-carbon, resilient electricity systems; The NDP Review commits to increasing the share of renewable electricity up to 80% by 2030.

Chapter 13 deals with NSO 8: Transition to a Climate-Neutral and Climate-Resilient Society, and Strategic Investment Priorities include:

- Renewable Energy Regular Renewable Electricity Support Scheme (RESS) auctions will deliver competitive levels of onshore wind and solar electricity generation which indicatively could be up to 2.5 GW of grid-scale solar and up to 8 GW of onshore wind by 2030.

4.3. The Climate Action and Low Carbon Development (Amendment) Act 2021

The Act commits Ireland to the objective of becoming a carbon-neutral economy by 2050 and reducing emissions by 51% by the end of the decade and is binding on the state. Section 4 refers to the annual update to the Climate Action Plan and the five yearly production of a long-term climate action strategy. Section 17 amends the principle act such that Section 15(1) requires that

"(1) A relevant body shall, in so far as practicable, perform its functions in a manner consistent with—

(a) the most recent approved climate action plan,

(b) the most recent approved national long term climate action strategy,

(c) the most recent approved national adaptation framework and approved sectoral adaptation plans,

(d) the furtherance of the national climate objective, and

(e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.

"Relevant body" means a prescribed body or a public body.

4.4. Climate Action Plan 2021-2030

This provides a detailed plan to achieve a 51% reduction in overall greenhouse gas emissions by 2030 and reach net-zero emissions no later than 2050. The Plan lists the actions needed to deliver on climate targets and sets indicative ranges of sectoral emission reductions. It will be updated annually.

Chapter 11, notes that Electricity accounted for 16.2% of Ireland's greenhouse gas (GHG) emissions in 2018. Decarbonisation of the electricity sector will continue by taking advantage of our significant renewable energy resources, in a competitive cost-effective way, while also ensuring the security of our electricity supply. This will also decrease dependence on imported fossil fuels.

Actions to meet the required level of emissions reduction, by 2030 include:

- Increasing the share of electricity demand generated from renewable sources to up to 80% without compromising security of electricity supply.
- At least 500 MW of these renewables will be delivered through local community-based projects, subject to competition as appropriate
- Complete the phase-out of coal and peat-fired electricity generation
- Ensure that 20-30% of system demand is flexible by 2030

4.5. National Energy & Climate Action Plan 2021-2030

The NECP incorporates all planned policies and measures identified up to the end of 2019 and which collectively deliver a 30% reduction by 2030 in non-ETS greenhouse gas emissions (from 2005 levels).

Renewable energy will be a critical and growing component of Irish energy supply to 2020 and beyond. Indigenous renewable energy already plays a vital role in our domestic fuel mix and increases sustainability through the use of clean power sources and enhances energy security by reducing dependence on imported fuels. Ireland has an ambitious and challenging target of increasing reliance on renewables from 30% to 70% by 2030

Section 3.1.2. notes that the new Renewable Electricity Support Scheme (RESS) is being developed under the Climate Action Plan and commits to 70% of electricity from renewable sources by 2030. The RESS has been designed within a competitive auction-based framework and will provide for a renewable electricity (RES-E) ambition of 70% by 2030. The new RESS is already expected to support up to an additional 4.5 GW of renewable electricity by 2030,

4.6. **National Energy Security Framework (April 2022)**

Theme 3: Reducing our Dependency on Imported Fossil Fuels

7.2 Replacing Fossil Fuels with Renewables; The replacement of fossil fuels (such as gas in electricity generation) is a key method to reduce reliance on imported fossil fuels. The Climate Action Plan commits to increasing the share of electricity demand met from renewable sources to up to 80%, without compromising security of electricity supply, reflecting the national target to reduce emissions by 51% by 2030, and achieve climate neutrality by 2050.

4.7. **Southern Regional Spatial and Economic Strategy**

RPO 87 Low Carbon Energy Future: The RSES is committed to implementation of policy under Ireland's Transition to a Low Carbon Energy Future 2015-30 and Climate Action Plan 2019. It is an objective to achieve reduced GHG emissions in accordance with current and future national targets, improve energy efficiency and increase the use of renewable energy sources.

RPO 95 Sustainable Renewable Energy Generation: To support implementation of the National Renewable Energy Action Plan, and the Offshore Renewable Energy

Plan and ……. leverage the Region as a leader and innovator in sustainable renewable energy generation.

RPO 99 Renewable Wind Energy: It is an objective to support the sustainable development of renewable wind energy at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.

RPO 100 Indigenous Renewable Energy Production and Grid Injection: To support the integration of indigenous renewable energy production and grid injection.

RPO 219 New Energy Infrastructure: Support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers ……to ensure the energy needs of future population and economic expansion …. can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs.

RPO 221 Renewable Energy Generation and Transmission Network:

a. Development Plans shall support the sustainable development of renewable energy generation and demand centres such as data centres which can be serviced with a renewable energy source ……to spatially suitable locations to ensure efficient use of the existing transmission network;
b. The RSES supports strengthened and sustainable local/community renewable energy networks, micro renewable generation, climate smart countryside projects and connections from such initiatives to the grid……
c. The RSES supports the Southern Region as a Carbon Neutral Energy Region.

4.8. Clare County Development Plan 2017 - 2023

This area is identified as a Strategic Area for Wind Energy, where Wind Energy is Acceptable in Principle.

CDP8.40 Development Plan Objective: Renewable Energy

a. Encourage and favourably consider proposals for renewable energy developments and ancillary facilities to meet national, regional and County renewable energy targets, and to facilitate a reduction in CO2 emissions and the promotion of a low carbon economy;

b. Assess future renewable energy-related development proposals having regard to the Clare Renewable Energy Strategy 2017-2023;
c. Assess proposals for wind energy development and associated infrastructure having regard to the Clare Wind Energy Strategy ……;
d. Prepare an updated Wind Energy Strategy for County Clare;
e. Strike a balance between facilitating renewable and wind energy-related development and protecting the neighbouring residential amenities;
f. Support and facilitate new alternatives and technological advances in relation to renewable energy production and storage;
g. Ensure that all proposals are in full compliance with the requirements of the SEA and Habitats Directives and Objective CDP2.1;
h. Promote and market the County as a leader of renewable energy provision;
i. Support the implementation of 'Ireland's Transition to a Low Carbon Energy Economy 2015-2030'

Volume 5 sets out the Clare County Wind Energy Strategy (WES).

WES 1: Development of Renewable Energy Generation; to support…… the development of wind energy resources…. (and)…. ensure the security of energy supply by accommodating the development of wind energy resources in appropriate areas and at appropriate scales within the County.

WES 8: Strategic Areas are eminently suitable for wind farm development, having good/excellent wind resource, access to grid, distance from properties and location outside designated sites. A target of 400MW from these areas is identified.

WES 9: Areas identified as Acceptable in Principle are suitable for wind farm development, with sufficient wind speeds, access to grid and established patterns of inquiries. A target of 150MW for these areas is identified.

Vol 6 sets out the Clare Renewable Energy Strategy 2017-2023, which identifies a target of 550MW of on-shore wind generation capacity by 2023.

5.0 Relevant Planning Cases

PA ref. 00/567 ABP ref. PL03.120616: Permission was granted in 2001 for a windfarm comprising 26 turbines not exceeding 60m and rotor diameter not exceeding 62m, at Booltiagh Townland and Glenmore North Townland, Connolly, Co.Clare, approx. 1.5km east of the subject site.

In 2010, permission was refused for modifications to this development under ref. PL.03.236950 for the following reasons:

- The Board was not satisfied that the proposed development, by itself and in conjunction with existing and permitted windfarm developments in the vicinity, will not have a significant adverse ecological impact on the habitat of hen harrier.
- There were deficiencies in the EIS in describing the potential impacts, and/or the significance of those impacts, on relevant aspects of the environment.

PA ref. P15/860 ABP ref. PL03.248008: Permission refused to Brookfield Renewables Ireland Ltd for a wind farm comprising 11 no. turbines to the east of the subject site at Doolough, Booltiagh, Shanavough East, and Others, Co. Clare.

The reason for refusal was that the Board was not satisfied that the proposed wind farm taken cumulatively with other wind energy development in the area, would not seriously injure the amenities of residential properties by way of noise effects.

PA ref. 20/658 ABP ref. ABP-311044-21: Permission granted for a windfarm development to the west of the subject site at Cahermurphy, Knocknahila More South, Carrownagry South, Caheraghacullin and Drummin, comprising 10 no. wind turbines, meteorological mast, 38kV substation. The development includes an underground grid connection cable running to the west - east to the north of the subject site, to connect to the existing Booltiagh 110kV substatio.

PA ref. 14/551: 10-year permission granted for 4 no. turbines and associated works at Cahermurphy, Kilmihil, approx. 2km west of the subject site. The turbines had a maximum blade tip height of up to 131m. The development was intended to replace an existing planning permission for a six-turbine development permitted under Pl. Ref. 03-2071, as extended by Pl. Ref. 09-267 and pl. Ref. 13-507.

A ten-year permission was subsequently granted under **PA ref. 19/159** for an increase in the tip height of turbine no. 3 by 19m to 150m.

PA ref. 14/575 ABP ref. PL03.245392: Permission granted for a wind farm at Glenmore, Boolnamweel, Boolynakockaun, Furoor, Kilmihil, Co. Clare, to the south of the subject site.

PA ref. 11/361 ABP ref. PL03.239933: Permission granted to Seahound Wind Energy Developments Limited for 6 no. wind turbines, meteorological mast, electricity substation and associated site works, for 10 years, at Kilmaley, County Clare, approx. 7km east of the subject site.

PA ref. 069/479 ABP ref. PL.03.236376: Permission granted for a windfarm development comprising 9 no. turbines at Boolnaglearagh, Lissycasey, approx. 8.5km east of the site.

PA ref. 13/681 ABP ref. PL03.244095: 10-year permission granted for an extension to Boolynagleragh Windfarm to include 7 turbines and all ancillary works at Boolynagleragh-Boolybrien, Knockatunna and Rathcroney, Co. Clare, approx. 8.5km east of the site.

ABP ref. ABP-305972-19: Current application for construction of a wind farm. comprising 6 wind turbines, with a hub height of 85 metres and rotor diameter of 82 metres and associated works, at Coor West, Shanavogh East and Shanavogh West, Co. Clare, approx. 4.5km north of the site.

6.0 Case made by Prospective Applicant

The prospective applicants made the following comments in respect of the proposed development in their initial submission to the Board:

- The site is within a ‘Strategic Area’ for wind energy development designated in the Clare Wind Energy Strategy and Clare County Development 2017 - 2023.
- There is a good road network which has been utilised previously for other wind farm projects in this aera.
- Installing a battery storage facility would optimise the carbon and economic value of electricity generated by wind, allowing the release of electricity into the grid

(always within approx. 12 hours) when it is most needed, either to abate the requirement for fossil fuel use or to support the network frequency or voltage.

- The BESS allows efficient time management of the release of the wind-generated electricity. This flexibility is a valuable management tool for the wind farm operator and for the grid operator (EirGrid).
- The feasibility of connecting to the 110kV overhead line in the south of the site via both overhead and underground cable connections are under consideration.
- The wind farm element with an output of 30MW, combined with the battery storage element of at least 30MW, will result in an "output" (or maximum export capacity (MEC) which is equivalent to "output") for the project in excess of 50MW.
- On the basis of a wind-generated output of greater than 50MW, the preferred option is to submit the directly to ABP in accordance with Section 37E.
- This renewable energy project would meet the provisions of Section 37A(2)(a) as it will represent a significant economic contribution to the region and the state as a whole and also the provisions of Section 37A(2)(b) as it will play a significant role in achieving national and regional targets for renewable energy.

Following the first pre-application consultation meeting, the prospective applicants made a second submission to the Board on 27/07/2022. This included a legal opinion which supported the argument that the proposed development meets the threshold for *Energy Infrastructure* set out in the Seventh Schedule, for the purposes s.37A(1).

Following the second pre-application consultation meeting, the prospective applicants made a further submission to the Board, addressing in particular, compliance with the criteria under S.37A(2). This submission makes the following points:

- BESS systems can provide system services required for the operation of a high renewable electricity system.
- BESS can very quickly provide energy into the electricity system to ensure frequency stability and can continuously help to maintain local voltage stability.
- BESS has the ability to store renewable energy and provide this energy onto the system when EirGrid decides to dispatch them on.

- Such systems are now competing in annual capacity auctions and being awarded capacity contracts by EirGrid.
- Eirgrid strategy documents confirm the benefit and need for more BESS on the electricity system, identifying a need for a four-fold increase in BESS by 2030.
- Section 37A(2)(a): A project of this scale will represent a significant economic contribution to the county, the region and the state as a whole through the provision of both direct and indirect employment; a community benefit fund; additional renewable electricity and providing stability of supply to the electricity system, contributing to the shift away non-renewable energy sources.
- Section 37A(2)(b): A key objective of the National Development Plan is to promote renewable energy use and generation.
- The designation of this areas as a 'Strategic Area' for wind energy development means the PA consider this to be of strategic regional and national importance. The proposed development would contribute to the target for such areas.
- With an output of up to 60MW of renewable electricity including storage capacity, the proposed development will contribute to achieving national, regional and local renewable energy targets and objectives to address climate change that are currently in place.

7.0 **Consultations**

Two pre-application consultation meetings were held with the prospective applicant, on the 08/07/2022 and 16/09/222. Minutes from these meetings are attached to the file. A presentation was made to the Board's representatives at the first meeting, which is also attached to the file.

The principal matters discussed at the first meeting related to

- The design specification of the turbines.
- The operation of the battery storage facility, and potential sources of energy.
- The calculation of total output from the proposed development, and the thresholds for energy infrastructure set out in the Seventh Schedule.
- Cumulative impacts with other wind energy development in the area,
- The assessment of potential environmental effects, including hen harrier activity in the area, adjoining designated sites, felling and peat stability.

- Any fire hazard implications of battery storage proposals.

The second pre-application consultation meeting on 16/09/2022 discussed compliance with the criteria under s.37A(2), particularly the role and contribution of BESS to the overall electricity grid.

8.0 **Legislative Provisions**

Section 37A of the Act states that:

(1) An application for permission for any development specified in the Seventh Schedule (inserted by the Planning and Development (Strategic Infrastructure) Act 2006) shall, if the following condition is satisfied, be made to the Board under section 37E and not to a planning authority.

(2) That condition is that, following consultations under section 37B, the Board serves on the prospective applicant a notice in writing under that section stating that, in the opinion of the Board, the proposed development would, if carried out, fall within one or more of the following paragraphs, namely—

(a) the development would be of strategic economic or social importance to the State or the region in which it would be situate,

(b) the development would contribute substantially to the fulfilment of any of the objectives in the National Planning Framework or in any regional spatial and economic strategy in force in respect of the area or areas in which it would be situate,

(c) the development would have a significant effect on the area of more than one planning authority.

The relevant threshold for Energy Infrastructure set out in the 7th Schedule of the Planning and Development Act 2000, as amended, is '*An installation for the harnessing of wind power for energy production (a wind farm) with more than 25 turbines or having a total output greater than 50 megawatt'*.

9.0 **Environmental Impact Assessment**

Schedule 5 of the Planning and Development Regulations, 2001 (as amended) transposes Annex I and II of the EIA Directive and sets out prescribed classes of development, for which an environmental impact assessment is required. The following class is noted:

Part 2 Class 3 (i): Installations for the harnessing of wind power for energy production (wind farms) with more than 5 turbines or having a total output greater than 5 megawatts.

It is noted that the prospective applicants have indicated their intention to prepare and submit an EIAR with any planning application in respect of the proposed development.

10.0 **Appropriate Assessment.**

I note that there are a number of European Sites within the wider surrounding area, including the following:

- Lower River Shannon SAC, approx. 8km south-southeast of the site.
- Mid-Clare Coast SPA, approx. 11km west of the site.
- Carrowmore Point to Spanish Point and Islands SAC, approx. 11km to the west of the site.
- River Shannon and River Fergus Estuaries SPA, approx. 15km east, southeast of the site.

It is anticipated that any application in respect of such development on these land would be subject to Screening for Appropriate Assessment.

11.0 **Assessment**

11.1. **Section 37A(1)**

The proposed development comprises the installation of 6 no wind turbines (a wind farm) with a total rated power output of 30MW (6 no. x 5MW), and a battery storage facility with capacity to store and subsequently discharge energy, with a total power output of 30MW.

The relevant threshold set out within the 7th Schedule is 'An installation for the harnessing of wind power for energy production (a wind farm) with more than 25 turbines or having a total output greater than 50 megawatt.'

In an earlier memo dated 18/08/2022, copy attached to this file, I concluded that based on the characteristics of the proposed development:

- The wind turbines and battery storage facility can be regarded as an installation.
- That the total output of the proposed development would exceed the 50 MW power output threshold for Energy Infrastructure developments for the purposes of s.37A(1).

On 25/08/2022, the Board made a preliminary determination as follows:

> Having regard to the information provided in relation to the proposed development and the inspector's assessment, the Board decided that the proposed development comprises a single installation which has a total power output to the national grid of more than 50MW and therefore meets the threshold set down in the Seventh Schedule for the purposes of section 37A of the Planning and Development Act 2000 as amended.

11.2. **The criteria under Section 37A(2)**

Having regard to the preliminary determination of the Board, and s.37A(1) of the Act, there is therefore a requirement to consider whether the proposed development falls within one or more of the paragraphs set out in s.37A(2).

(a) the development would be of strategic economic or social importance to the State or the region in which it would be situate,

I note the prospective applicant's submissions in relation to the criteria under s.37A(2). In terms of economic importance, I do not consider the likely construction and operational employment numbers to be so significant as to be of strategic importance to the region or State. Similarly, any community benefit fund from a development of this scale is likely to be of local significance only and not of strategic importance.

The prospective applicants highlight the contribution of the proposed development in terms of wind energy generation and energy storage. Submissions describe the strategic role of battery storage systems in terms of energy storage and network stabilisation / system support services in general terms. In this regard I note that Eirgrid have identified a requirement for additional battery energy storage technologies by 2030 for reserve provision, capacity adequacy and to assist with congestion management.

In broad terms, it is accepted that the development of additional renewable generation capacity and associated battery storage capacity are of importance to the state and region, contributing to national energy and climate targets in overall terms and assisting security of supply. The scale of development proposed in this case is an important factor in considering the development under s.37A(2), however.

The development comprises a wind energy generation component of 30MW and a battery storage component of 30MW. In determining that the development meets the threshold set down in the Seventh Schedule, regard was had to previous interpretations of the term *total output* as the total power output from the installation to the national grid. (See earlier memo dated 18/08/2022.)

I note that the wind energy generation component of the development falls significantly below the 7th Schedule threshold in terms of the number of turbines (25 no.) and MW output. While the contribution / discharge of the battery storage facility provides for a total potential output from the installation to the grid in excess of the threshold set out in the Seventh Schedule, such contribution will by its nature be limited in duration. I consider that this differentiates the proposal from a development with a consistent potential output in excess of such thresholds, and note further that battery energy storage facilities are not in themselves a type of energy infrastructure project listed in the seventh schedule.

In relation to systems services which can be facilitated by battery storage facilities, the prospective applicant’s submissions do not address the specific scale of the battery storage system proposed in this case. Notwithstanding the benefits of such facilities, it is not clear how significant a role the proposed 30MW BESS facility can play in terms of system services or how the subject development will play a strategic role in the region or nationally.

In the context of a target cited by Eirgrid of 1,700MW of battery storage by 2030[1] and of the scale of other permitted and proposed battery storage facilities around the country[2], such a facility would not appear to be significant in scale or of strategic importance. In terms of the operation of the national grid, I do not consider that the proposed development can be regarded as being of strategic economic or social importance.

(b) the development would contribute substantially to the fulfilment of any of the objectives in the National Planning Framework or in any regional spatial and economic strategy in force in respect of the area or areas in which it would be situate,

I note the broad objectives of the National Planning Framework in support of renewable energy and the commitment in the RSES to implementation of the Government policy under Ireland's Transition to a Low Carbon Energy Future 2015-30 and Climate Action Plan 2019. The Strategy does not specific targets or objectives in terms of generation capacity, however.

In this regard, and having regard to the conclusions in relation to paragraph (a) above, I am satisfied that while the development would be aligned with national and regional policies and objectives, it would not in itself by reason of its nature and scale contribute substantially to the achievement of such objectives. The development would not therefore satisfy the requirement set out in section 37A(2)(b) of the Act.

(c) the development would have a significant effect on the area of more than one planning authority.

While it may be argued that the development will have an effect on the overall national grid, I am not of the opinion that the proposed development can be said to have a significant effect on the area of more than one planning authority for the purposes of S.37A(2).

[1] https://www.eirgridgroup.com/site-files/library/EirGrid/Shaping_Our_Electricity_Future_Roadmap.pdf
[2] E.g. PA ref. 21/608 ABP ref. 310841-21 212MW battery storage facility at Dunnstown, Co. Kildare & PA ref. 21/532 275MW battery storage facility at Rochfortbridge, Co Westmeath

Conclusion

Based on the foregoing assessment, it is concluded that the proposed development would meet the threshold set out in the Seventh Schedule of the Planning and Development Act 2000, as amended and therefore satisfies Section 37A(1) of the Act. It is also concluded, however, that the development would not fall within one or more of the paragraphs set out in s.37A(2). The proposed development would not therefore constitute strategic infrastructure development.

12.0 Recommendation

The proposed development of a fully integrated wind energy generation & storage development, comprising 6 wind turbines with an output of 30 MW which is to be electrically integrated with a battery energy storage facility with storage capacity of 30MW, a 110 kV substation and associated infrastructure to connect to the electricity grid on a site in the townlands of Doolough, Glenmore and Cahermurphy, Co. Clare, would meet the threshold for Energy Infrastructure set out in the Seventh Schedule, for the purposes of S.37A(1).

The proposed development, by reason of its nature and scale, is not considered to fall within paragraphs set out in s.37A(2) of the Planning and Development Act 2000, as amended. An application for permission for the proposed development should therefore be made in the first instance to the relevant planning authority.

Conor McGrath

Senior Planning Inspector

25/10/2022