

File With _____

SECTION 131 FORM

Appeal NO: ABP 320354-24Defer Re O/H ☐Having considered the contents of the submission dated/ received 28/8/24
fromPA I recommend that section 131 of the Planning and Development Act, 2000be/not be invoked at this stage for the following reason(s): No new material planning issuesE.O.: Daniel & ConnorDate: 10/9/24

For further consideration by SEO/SAO

Section 131 not to be invoked at this stage. ☐Section 131 to be invoked – allow 2/4 weeks for reply. ☐

S.E.O.: _____

Date: _____

S.A.O.: _____

Date: _____

M _____

Please prepare BP _____ - Section 131 notice enclosing a copy of the attached submission

to: _____ Task No: _____

Allow 2/3/4weeks – BP _____

EO: _____

Date: _____

AA: _____

Date: _____

File With _____

CORRESPONDENCE FORM

Appeal No: ABP 320354-24

M _____

Please treat correspondence received on 28/8/24 as follows:

1. Update database with new agent for Applicant/Appellant _____ 2. Acknowledge with BP <u>20</u> 3. Keep copy of Board's Letter ☐	1. RETURN TO SENDER with BP _____ 2. Keep Envelope ☐ 3. Keep Copy of Board's letter ☐
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Amendments/Comments	<u>Att's response to appeal</u>

4. Attach to file (a) R/S ☐ (d) Screening ☐ (b) GIS Processing ☐ (e) Inspectorate ☐ (c) Processing ☐	RETURN TO EO ☐ <u>Screening drawer</u>
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EO: <u>Daniel O'Connor</u>	Plans Date Stamped ☐
Date: <u>29/8/24</u>	Date Stamped Filled in ☐
AA: <u>Jan Kelly</u>	Date: <u>02/09/2024</u>



COMHAIRLE CONTAE
CHEATHARLACH

CARLOW COUNTY COUNCIL

Oifigí an Chontae,
Bóthar Átha Í,
Ceatharlach, R93E7R7

County Buildings,
Athy Road,
Carlow, R93E7R7

T: 059 9170300
E: See carlow.ie/contact-us
W: carlow.ie

23rd August 2024

Ian Kelly,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902.

Registered Post

AN BORD PLEANÁLA

LDG- _____
ABP- _____

28 AUG 2024

Fee: € _____ Type: _____
Time: 9.32 By: [Signature]

Re:
Description of Development:

PL24/60122 & ABP-320354-24

(i) The construction of 7 no. wind turbines with the following parameters: a. Total tip height range of 179.5m–180m, b. Rotor diameter range of 149m–155m, c. Hub height range of 102.5m–105m, (ii) Construction of associated foundations, hardstand and assembly areas; (iii) All associated wind farm underground electrical and communications cabling connecting the turbines and meteorological mast to the proposed onsite electrical substation including road crossing at L30372, Co. Carlow; (iv) Construction of 1 no. permanent 38kV electrical substation compound including a single-story control building with welfare facilities, all associated electrical plant and equipment, security fencing, entrance on to the access track, all associated underground cabling, wastewater holding tank and all ancillary works in the townland of Seskinrea, Co. Carlow; (v) A permanent Battery Energy Storage System within the electrical substation compound in the townland of Seskinrea, Co. Carlow; (vi) All works (within County Carlow) associated with the connection of the proposed wind farm to the national electricity grid, via underground 38kV electrical cabling predominantly within the public road corridor from the proposed onsite electrical substation in the townland of Seskinrea, Co. Carlow to the existing 110kV Kilkenny substation; (vii) Provision of 2 no. joint bays, communication chambers and earth sheath links along the underground electrical cabling route; (viii) Reinstatement of the road and track surfaces above the cabling trench along existing roads and tracks; (ix) 1 no. meteorological mast of c. 36.5m in height, and associated foundation and hard-standing area in the townland of Ridge, Co. Carlow; (x) The permanent upgrade of 1 no. existing site entrance off L3037 for the provision of construction and operational access; (xi) The provision of 1 no. new permanent site entrance and the upgrade of 1 no. existing site entrance off the L30372; (xii) Upgrade of existing tracks/roads and provision of new site access roads, 2 no. clear span bridge crossings, junctions and hardstand areas; (xiii) 2 no. temporary construction compounds with temporary offices and staff facilities in the townland of Ridge and Seskinrea, Co. Carlow; (xiv) Carriageway strengthening works at 'Black Bridge' on the L1835/L3037 (Protected Structure: Kilkenny RPS Ref. D84); (xv) Peat and Spoil Management; (xvi) Tree Felling to accommodate the construction and operation of the proposed development; (xvii) Operational stage site signage; and (xviii) All ancillary apparatus and site development works above and below ground, including soft and hard landscaping and drainage infrastructure; A 10-year planning permission and 35-year operational life of the wind farm from the date of commission of the entire windfarm is sought. A concurrent planning application for works

within Co. Kilkenny including junction accommodation works, bridge strengthening works and the 38kV underground grid connection to the existing 110kV Kilkenny substation will also be lodged to Kilkenny County Council. A design flexibility opinion issued by Carlow County Council on 14th March 2024 accompanies this application. The details unconfirmed in this application are the turbine tip height, rotor diameter and hub height. The range of parameters under which the turbine dimensions will fall are specified on this notice and in the design flexibility opinion that accompanies this application. The proposed development includes bridge strengthening works within the curtilage of a Protected Structure (Black Bridge – Kilkenny RPS Ref. D84). An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) have been prepared in respect of the proposed development and will be submitted to the planning authority with this application.

Location of Development: In the townlands of, Ridge, Agharue, Coolnakisha, and Seskinrea, Co. Carlow
Applicant: EDF Renewables Ireland Limited.

Dear Mr. Kelly,

I refer to your correspondence in relation to the above dated 2nd August 2024 and the content therein.

Please be advised that further to the review of the details of the third party appeal relating to the above-mentioned Planning Permission PI ref; 24/60122 – ABP-320354-26, the Planning Authority wish to re-iterate the following points in relation to the recommendation to refuse Planning Permission for the proposed development:

- Carlow County Council through the adoption of the Carlow County Development Plan 2022-2028 and associated Renewable Energy Strategy has a generally supportive stance on wind energy development and is seeking to achieve a reasonable balance between responding positively to Government policy on renewable energy and enabling the renewable energy resources of the County to be harnessed in a manner that is consistent with proper planning and the sustainable development of the area. The Renewable Energy Strategy acknowledges the opportunity in County Carlow to achieve a target up to 130MW from renewable energy by 2030, the majority of which is anticipated from Solar Energy. The significantly more limited proportion anticipated from wind farm developments is an acknowledgement of the significant landscape sensitivities which exist within the County.
- The Planning Authority consider that the particular location of the subject site in an unbroken expanse of land and in the Killeslin Hills upland landscape where the cumulative impact of the proposed windfarm with permitted adjoining windfarms is more significant than in a more undulating landscape area and would result in a significant and disproportionate landscape and visual impact and would therefore be contrary to the provisions of the Carlow County Development Plan 2022-2028. In this regard the Planning Authority note the Draft Revised Wind Energy Development Guidelines 2019 address cumulative impact and notes that in terms of cumulative effect a landscape of complex landform and landcover provides a greater possibility of screening for more than one wind energy development.

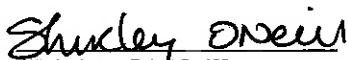
- Policy WE. P4 states that wind energy development is not normally permissible in the Uplands Landscape Type, and Policies LA. P1, LA. P2, LA. P3 and LA. P11 seek to protect and maintain the overall integrity of the County's landscape by recognising its capacity to sustainably integrate and absorb appropriate development, and by ensuring development does not have a disproportionate landscape or visual impact in sensitive upland areas. The proposed development is contrary to these policies and will not integrate into the landscape and its overall impact is deemed to be disproportionate taking permitted adjoining windfarm development and the overall landscape sensitivity of 5, out of a rating scale of 1 to 5 into consideration.
- The Planning Authority do not consider that the appeal response has satisfactorily demonstrated that the local road network is of adequate capacity and design to accommodate the frequency and volume of HGV traffic along the proposed haul routes together with any cumulative impact that the permitted adjoining Wind Farms may accrue.

Please be advised that notwithstanding the content of the appeal, the position of the Planning Authority remains as per the Planner's report recommendation.

The Board is directed to the details set out the planning reports and internal department reports for the planning application.

If you have any further queries in relation to this matter, please contact Shirely O' Neill at 059-9136229 or planningdevman@carlowcoco.ie.

Yours sincerely,


Shirley O' Neill
Administrative Officer

