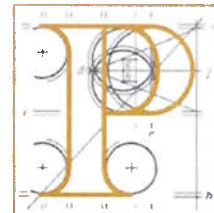


Our Case Number: ABP-318505-23



An
Bord
Pleanála

Clare County Council
Planning Department
New Road
Ennis
Co. Clare

Date: 24 January 2024

Re: Proposed construction of a 110kV underground grid connection cable connecting the permitted Carrownagowan windfarm to the existing 110kV substation at Ardnacrusha.
Within the townlands of Caherhurly, Killokennedy, Cloongaheen West, Leitrim, Castlebank, Ballykeelaun, County Clare. (www.carrownagowangridplanning.ie)

Dear Sir / Madam,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.


The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime, please contact the undersigned officer of the Board or email sids@pleanala.ie quoting the above mentioned An Bord Pleanála reference number in any correspondence with the Board.

Yours faithfully,



Lauren Murphy
Executive Officer
Direct Line: 01-8737275

VA11

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
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Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



COMHAIRLE | CLARE
CONTAE AN CHLÁIR | COUNTY COUNCIL

Your Ref: ABP-318505-23

19th January 2024

An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

AN BORD PLEANÁLA	
LDG- _____	
ABP- _____	
22 JAN 2024	
Fee: € _____	Type: _____
Time: 9.00am	By: Bat

Submission of the Planning Authority regarding application ABP-318505-23 made under Section 182A(1) of the Planning and Development Act, 2000 (as amended)

A Chara,

Clare County Council welcomes this opportunity to comment on the application by FuturEnergy Carrownagowan DAC made under Section 182A(1) of the Planning and Development Act, 2000 (as amended).

The proposed development comprises a 25km 110kv underground cable connection from the Carrownagowan Wind Farm substation (granted under ABP-308799-20) to the existing ESB owned substation at Ardnacrusha, Co Clare. The submitted plans and particulars including the associated Environmental Impact Assessment Report (EIAR) and Screening for Appropriate Assessment Report, have been reviewed and Clare County Council wishes to note the following:

Site Location

The proposed development site stretches from the northern slopes of Slieve Bernagh Mountains to the Ardnacrusha Power Station, traversing 25 no. townlands along its route. The proposed underground cable will primarily be installed within the body of the public road.

Local Planning Policy Context

Clare County Development Plan 2023-2029

CDP14.2 Settled Landscapes

It is an objective of Clare County Council to permit development in areas designated as 'settled landscapes' to sustain and enhance quality of life and residential amenity and promote economic activity subject to:

- Conformity with all other relevant provisions of the Plan and the availability and protection of resources;
- Selection of appropriate sites in the first instance within this landscape, together with consideration of the details of siting and design which are directed towards minimizing visual impacts;

An Roinn Pleanála

An Stiúirthóireacht Forbairt Gheilleagrach

Áras Contae an Chláir, Bóthar Nua, Inis, Co. an Chláir, V95 DXP2

Planning Department

Economic Development Directorate

Áras Contae an Chláir, New Road, Ennis, Co. Clare, V95 DXP2



- iii. Regard being had to the need to avoid intrusion on scenic routes and on ridges or shorelines.

Developments in these areas will be required to demonstrate:-

- a) That the site has been selected to avoid visual prominence.
- b) That the site layouts avail of existing topography and vegetation to reduce visibility from scenic routes, walking trails, water bodies, public amenities and roads.
- c) That design of buildings and structures reduces visual impact through careful choice of forms, finishes and colours, and that any site works seek to reduce visual impact.

CDP14.3 Western Corridor Working Landscape

It is an objective of Clare County Council:

- a) To permit development in these areas that will sustain economic activity, and enhance social well-being and quality of life - subject to conformity with all other relevant provisions of the Plan and the availability and protection of resources;
- b) To ensure that selection of appropriate sites in the first instance within this landscape, together with consideration of the details of siting and design, are directed towards minimizing visual impact;
- c) To ensure that particular regard should be had to avoiding intrusions on scenic routes and on ridges or shorelines. Developments in these areas will be required to demonstrate:
 - i. That the site has been selected to avoid visual prominence.
 - ii. That site layouts avail of existing topography and vegetation to reduce visibility from scenic routes, walking trails, public amenities and roads.
 - iii. That design of buildings and structures reduces visual impact through careful choice of form, finishes and colours and that any site works seek to reduce the visual impact of the development.

CDP14.7 Scenic Routes

It is an objective of Clare County Council:

- a) To protect sensitive areas from inappropriate development while providing for development and change that will benefit the rural community;
- b) To ensure that proposed developments take into consideration their effects on views from the public road towards scenic features or areas and are designed and located to minimise their impact; and
- c) To ensure that appropriate standards of location, siting, design, finishing and landscaping are achieved.

CDP11.47 Renewable Energy

It is an objective of Clare County Council:

- a) To encourage and to favourably consider proposals for renewable energy developments, including community owned developments, and ancillary facilities in order 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) To assess future renewable energy-related development proposals having regard to the *Clare Renewable Energy Strategy 2023-2030* in Volume 5 of this plan and associated SEA and AA;
- c) To support the sustainable development of renewable wind energy (on-shore and offshore) at appropriate locations and of its related grid infrastructure in County Clare, in accordance with all relevant policies, guidance and guidelines pertaining to the protection of the environment and protected habitats and species, and to assess proposals having regard to the *Clare Wind Energy Strategy* in Volume 6 of this plan and the associated SEA and AA, or any subsequent updated adopted Strategy and to national Wind Energy Guidelines;
- d) To prepare a new and updated Wind Energy Strategy for County Clare during the lifetime of this plan, subject to the publication of the update to the *Wind Energy Development Guidelines for Planning Authorities 2006*;
- e) To strike an appropriate balance between facilitating renewable and wind energy-related development and protecting the residential amenities of neighbouring properties;
- f) To support and facilitate the development of new options and technological advances in relation to renewable energy production and storage, that may emerge over the lifetime of this Plan;
- g) To support the integration of indigenous renewable energy production and grid injection;
- h) To ensure that all proposals for renewable energy developments and ancillary facilities in the County are in full compliance with the requirements of the *SEA* and *Habitats Directives* and Objective CDP3.3 of this plan; and
- i) To promote and market the County as a leader of renewable energy provision.

CDP11.48 Renewable Energy Strategy

It is an objective of Clare County Council:

- a) To support implementation of the *National Renewable Energy Action Plan (NREAP)*, and the *Offshore Renewable Energy Plan* including mitigation measures outlined in their respective SEA and AA and promote County Clare and the Southern Region as a leader and innovator in sustainable renewable energy generation; and
- b) To support the implementation of the *Clare Renewable Energy Strategy 2023-2030* in Volume 5 of this plan; and
- c) To support the development of a Regional Renewable Energy Strategy with relevant stakeholders.

CDP2.22 Ardnacrusha Hydroelectric Power Station

It is an objective of Clare County Council to support the utilisation of all of the existing infrastructure at Ardnacrusha Hydroelectric Power Station, to increase its power input to the National Energy Grid.

Relevant Planning History

Reference: ABP-308799-20

Applicant: Coillte

Proposal: A 10 year permission for the development of 19 wind turbines, one meteorological mast, 110kV substation and all associated site development works.

It is noted that the proposed grid connection development works were included in the EIAR associated with the development proposal.

Appropriate Assessment

A Screening for Appropriate Assessment is included as Appendix 6-1 of the EIAR. The contents of the screening are noted, and Clare County Council would like to raise the following matters of concern:

Section 5.3.1 of the report identifies the potential impacts of the proposed development as follows:

Surface water run-off and discharges from construction working areas including occasional pumping in order to dewater excavations.

A 5km Zone of Influence (Zoi) is identified for the proposed development. It is stated that there are two European sites within the Zoi, namely Slieve Bernagh Bog SAC (Site Code 002312) and Glenomra Wood SAC (Site Code 001013).

The screening process fails to consider the potential impact of the proposed development on the Lower River Shannon SAC (Site Code 002165) which is located less than 2km from the development location, within the Zoi. There is hydrological connectivity between the proposed development and the Lower River Shannon SAC via the River Blackwater and the numerous local watercourse and channels. The failure to consider potential impacts of the development on the Lower River Shannon SAC is a potentially significant omission which may undermine the validity of screening conclusion and the determination that the proposed development will not have a significant effect on European sites.

Roads and Traffic Issues

Road Opening Licenses:

- A T1 License will be required for the overall Grid Connection.
- T2 Licenses will be required in 7 no. or more sections and be applied for as works progress in the project.
- Road Opening License fees will automatically be calculated by Map Road Licensing.
- A Bond of €500,000 is requested. This bond is required to ensure Clare County Council's road network will be preserved, particularly with diversions and haulage from the proposed works.
- It is recommended that a Clerk of Works from Clare County Council supervise the works. The applicant shall bear these costs.
- It is recommended that the applicant provide a Community Relations Officer.

Road Reinstatement:

- Lane width reinstatement will be required on the R-466 Regional Roads in compliance with Standard Drawing SD4 of the Guidelines for Managing Opening in Public Roads, Second Edition (Rev 1) April 2017.
- Full road width reinstatement will be required on the R-471 Regional Roads in compliance with Standard Drawing SD4 of the Guidelines for Managing Opening in Public Roads, Second Edition (Rev 1) April 2017.

- All junctions with opening and changes in direction of routes at junctions will require full junction reinstatement in compliance with Standard Drawing SD4 of the Guidelines for Managing Opening in Public Roads, Second Edition (Rev 1) April 2017.
- Launch and received pits from directional drilling must be reinstated in compliance with Standard Drawing SD4 of the Guidelines for Managing Opening in Public Roads, Second Edition (Rev 1) April 2017.
- Lane width reinstatement will be required from Ch0m to Ch2700m in compliance with Standard Drawing SD4 of the Guidelines for Managing Opening in Public Roads, Second Edition (Rev 1) April 2017.
- Local roads shall receive double surface dressing on 100mm paved Cl.806 full road reinstatement, Surface dressing to be carried out by an approved contractor, works to be completed within the surface dressing season in compliance with Standard Drawing SD5 of the Guidelines for Managing Opening in Public Roads, Second Edition (Rev 1) April 2017 and in compliance with the IAT Guidelines for Surface Dressing.
- Sections of road in marsh/peat areas shall be overlaid in 150mm depth capping to Cl6F2, Securgrid or similar approved, 100mm depth of Cl.804 and double surface dressing or otherwise similarly approved by the Killaloe or Shannon Municipal District.

Road Closures:

- Road closures are to be advertised in advance of works with key dates provided taking account of diversion routes.
- Traffic from Regional road networks cannot be diverted to Local Primary roads. All Regional road closures will require traffic to be diverted to Regional roads only.
- No closure of the R-466 will be permitted.

Bridges/Culverts/Pipelines:

- A pre-condition survey must be carried out on all bridges/culverts and pipelines along the grid route.
- Damage to any structure will require immediate notification to the Scariff or Shannon Offices of Clare County Council. Full replacement of damaged structures and pipelines will be required.
- Post works surveys of each Bridge/Culvert structures will be required.

Walking Routes:

- Clare County Council also notes the proposed grid connection route overlaps with 4.7km of the East Clare Way walking route. Section 5.4.1.6 of the EIAR indicates that access for walkers will not be restricted.
- In the interest of public and recreational amenities, safe and unobstructed access for users of the walking route should be maintained throughout any permitted construction.

Footpaths:

- The Planning Authority notes that the proposed route passes through the zoned settlement of Ardnacrusha. As part of any community gain conditions, it is considered that the provision of a footpath in conjunction with the road works may be an opportunity to enhance pedestrian facilities in the area where currently there is limited footpath provision. The Board may wish to consider the inclusion of such a condition in the event of a grant of permission.

Management of Waste

The submitted documentation indicates that c.22,000m³ of soil / spoil will be excavated to facilitate construction works. Some of the excavated materials will be backfilled and surplus materials will be exported to a licenced facility. Three facilities are named as the licensed locations which will receive the excavated spoil material. Clare County Council notes that the named facilities generally do not provide for the disposal of large quantities of spoil material.

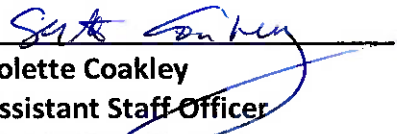
All surplus spoil materials must be exported to a suitable facility with the relevant planning and environmental consents i.e. planning permission and Certificate of Registration / Waste Facility Permit.

Conclusion

The above comments represent Clare County Council's considerations on the application for approval made by FuturEnergy Carrownagowan DAC under Section 182A(1) of the Planning and Development Act, 2000 (as amended). In general, it is noted that the proposal is supported by the existing Development Plan Policy and the existing Wind Energy Strategy. Notwithstanding this policy support, a careful balance has to be struck between facilitating the permitted Carrownagowan Wind Farm development and the protection of residential amenity, natural heritage, recreational amenity and the infrastructure of the area.

It is respectfully requested that the Board take the above issues into consideration in the assessment of this application.

Mise le Meas,


Colette Coakley
Assistant Staff Officer
Planning Department
Economic Development Directorate