

Second Response to Observations Received

Borrisbeg Renewable
Energy Development (ABP
Ref. 318704-23)





DOCUMENT DETAILS

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1.

INTRODUCTION

MKO have been instructed by Buirios Ltd (the Applicant), to prepare a response to the request received from An Bord Pleanála (the Board) on the 4th of April 2024, regarding the proposed Borrisbeg Renewable Energy Development, seeking a submission on further observations received by the Board in relation to the application (Third-Party Submission). The request was made in relation to the Strategic Infrastructure Development (SID) planning application before the Board for consideration (ref: ABP-318704-23) in relation to the proposed Borrisbeg Renewable Energy Development located at Borrisbeg and adjacent townlands, near Templemore, Co. Tipperary. The letter from the Board states that the deadline for submission is the 1st of May 2024 by 5.30pm.

It is noted that a ‘Response to Observations Received’ was submitted to the Board on the 28th March 2024, in response to a letter from the Board dated 29th February 2024 (the March Response). Many of the concerns raised in the Third-Party Submission have already been addressed in the March Response and will not be repeated here in the interest of brevity. This document should be read in conjunction with the March Response.

It is acknowledged that the Third-Party Submission is generally supportive of the proposed wind farm site and wind farms generally and has not recommended refusal of the planning application. All concerns raised in the Third-Party Submission have been dealt with in the documentation submitted with the planning application for the Proposed Wind Farm, the March Response, and are further expanded in this response, where considered necessary.

Table 1 below outlines the themes from the March Response which are common to the themes in the Third-Party Submission, and notes whether further discussion is necessary in this response.

Table 1 Overview of the common themes in the response to submissions

Theme	Comment
Noise Concerns/Noise Guidelines	Refer to the March Response - Further discussion provided in relation to Construction Phase Noise and Vibration impacts
Health and Quality of Life	Refer to the March Response - No further discussion necessary
Property Value	Refer to the March Response - No further discussion necessary
Examination of Alternatives	Refer to the March Response - Further discussion provided in relation to consideration of alternative site access routes
Landscape and Visual	Refer to the March Response - No further discussion necessary
Roads & Transport	Refer to the March Response - Further discussion provided in relation to Construction Phase impacts relating to Noise and Vibration, and dust
Community Benefit Scheme and Community Consultation	Refer to the March Response - No further discussion necessary

2.

RESPONSE TO THIRD PARTY OBSERVATION:

Table 2 below outlines the themes identified within the Third-Party Submission where further discussion is provided in this response.

Table 2 Third Party Submission Themes for further discussion

No.	Theme sub-heading	Concerns highlighted in the Third-Party Submission that were not specifically addressed in the March Response
1.	Construction Phase Noise & Vibration	The proximity of the site access to their property is highlighted as a concern, with the potential to cause noise and vibration impacts on the property, including potential structural damage.
2.	Construction Phase Air & Dust Pollution	The observation highlights concern over the potential impacts of increased dust and air pollution arising from the construction phase of the development.
3.	Alternative Site Access Design	It is requested that an alternative site access location should be explored as there are road safety concerns over the present location.

It is noted that the Third-Party Submission outlines details of historic road improvement and agricultural works which are not discussed in the response document as they are not relevant to the Proposed Wind Farm.

2.1

Construction Phase Noise & Vibration

The Third-Party Submission refers to the potential noise impact from construction activity and heavy plant traffic at the Proposed Wind Farm site. The observation outlines concerns regarding the impact of noise and vibration from construction traffic as well as an expression of concern over structural damage to their house due to vibrations caused during construction of the Proposed Wind Farm.

The EIAR includes a robust and detailed Noise & Vibrations Assessment carried out by Awn Consulting Ltd. The assessment of construction and decommissioning noise and vibration and has been conducted in accordance with best practice guidance contained in *BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Noise* and *BS 5228-2:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Vibration*.

In summary, the noise and vibration impact of the Proposed Project has been considered in accordance with best practice guidance and it has been demonstrated that no significant impact in terms of noise and vibration will occur.

Notwithstanding the conclusions of the EIAR in relation to Noise & Vibration, to allay the concerns raised in the Third-Party Submission, the Applicant is agreeable to further precautionary mitigation measures, such as temporary acoustic screening along the boundary and a pre/post structural condition survey of the relevant property, which can be conditioned by the Board, should planning permission be granted for the Proposed Wind Farm.

2.2

Construction Phase Air & Dust Pollution

The Third-Party Submission expresses concern over potential air pollution during the construction stage of the project including the potential impacts of traffic emissions, dust emissions and an overall depletion in air quality during construction.

As stated in Section 10.2.2 of the EIAR, following implementation of mitigation measures, residual impacts on air quality from traffic emissions and dust emissions from traffic movements to and from the Site during the construction phase will have a short-term imperceptible negative impact. Based on the assessment outlined in the EIAR, the effects on air quality from dust emissions generated by traffic movements and other construction activities at the Site during the construction phase will be imperceptible. Therefore, there will be no significant impact.

2.3

Alternative Site Access Design

The Third-Party Submission expresses concern regarding road safety at the junction of the proposed site entrance and recommends an alternative access point.

Chapter 3 of the EIAR specifically deals with consideration of alternatives. Section 3.2.5.6.3 '*Alternative Site Access Points*' of the Chapter 3 outlines the rationale as to why the currently proposed L-3248 site access was chosen as the safest option. The proposed site access design is in accordance with TII Official Policy, and its ability to achieve the necessary sightlines for traffic safety.

It is reiterated that the use of the temporary abnormal loads entrance will be temporary in nature and used only at night-time under strict supervision, over a short period of the construction phase. The abnormal loads entrance will be reinstated after all abnormal loads have been delivered to site.

Furthermore, as noted in Section 15.2.17.2 of the EIAR a detailed traffic management plan will be in place for the construction phase of the Proposed Wind Farm.

3.

CONCLUSION

This document has been prepared to address the observations made by a third-party observer in respect of the proposed Borrisbeg Renewable Energy Development. The information constitutes a full and robust response to the matters raised and the information provided here will directly assist the Board in their ongoing consideration of the planning application under reference ABP-318704-23.

It is submitted that, based on the combined documentation provided, the Proposed Wind Farm site is suitable for wind energy development and the Proposed Wind Farm is in accordance with the proper planning and sustainable development of the area and County Tipperary as a whole, it is respectfully requested that the Board grants permission for the Proposed Wind Farm which is the subject of this application.