

Mr. Raymond Muwaniri An Bord Pleanála 64 Marlborough Street Dublin 1 001 V902

**DESIGNING AND DELIVERING** A SUSTAINABLE FUTURE

Our Ref: P20306-FT-EGN-XX-LT-PM-0001

Re: ABP-321507-24 and ABP-321495-24 - Pre-application Consultation and Design Flexability Opinion for an 11 no. turbine wind farm and associated infrastructure. Located within the townlands of Beagh More, Cloonbar, Cloonnaglasha. Corillaun, Derrymore, Shancloon, Toberroe and **Tonacooleen, County Galway** 

Dear Raymond,

Thank you for your letters dated 08th April 2025 (case ref: ABP-321507-24 and ABP-321495-24 enclosed for record) containing minutes of our first pre-application consultation meeting held on 12th March 2025, including minutes of the discussion held relating to a design flexibility opinion from the

Our client, the prospective applicant, RWE Renewables Ireland Ltd., wishes to submit the following comments / clarifications pertaining to the record of said meetings:

#### Pre-Application Consultation (ABP-321507-24)

- 1. As part of the Applicant's presentation for pre-application consultation, it was stated that noise modelling has identified 2 receptors which might experience noise levels above daytime levels. However, the minutes have documented 3 locations. Additionally, it was noted at the meeting that one of the receptors is an involved landowner and an agreement is in place that the property will be uninhabited for the duration of the windfarm operation. It was also stated by the Applicant that the noise exceedance is only at specific wind speeds and can be readily mitigated through operational controls.
- 2. During the discussion it was noted that 'some turbine locations have been revised due to the presence of bats'. To further clarify, in accordance with best practice guidelines "Guidance on Bat Surveys, Assessment & Mitigation for Onshore Wind Turbine Developments - Version 1.1 NIEA, Natural Environment Division, (2021, Updated April 2024)" and "Bats and Onshore Wind Turbines: Survey, Assessment and Mitigation (SNH, 2019 and NatureScot 2021)" and as informed by bat survey carried out between 2020 and 2023, turbines were moved beyond the recommended 200m buffer from maternity/hibernation/swarming sites and 50m from key foraging, commuting and landscape connectivity habitat features.







Ireland

Company Secretary: Dave O'Regan

Directors: Sinéad Timoney | Bernadette Guinan | Jim Hughes | Ray O'Dwyer



3. Regarding Canadian pondweed (*Elodea canadensis*) it is noted that this species is not listed in the European Union (Invasive Alien Species) Regulations 2024 as invasive alien species of national concern. However, this species is listed in the Third schedule of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended). The clean-checkdry protocol will be employed to ensure that the project does not cause the dispersal, spread, or growth of any aquatic invasive species including Canadian pondweed.

#### Design Flexibility (ABP-321495-24)

RWE Renewables Ireland Ltd. can confirm that the minutes are an accurate reflection of the rationale upon which a design flexibility opinion is sought.

#### **Request for Formal Closure of Pre-application Consultation Process**

RWE Renewables Ireland Ltd. confirms that no further pre-application consultation meetings are required and that they are happy to formally close the pre-application consultation process.

We look forward to the Board's determination in this regard.

Yours sincerely,

Rita Mansfield

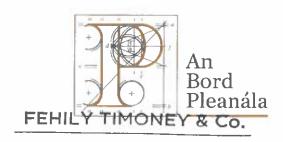
Rita Mansfield

for and on behalf of Fehily Timoney and Company / RWE Renewables Ireland Ltd.

Encls.

Our Case Number: ABP-321495-24

Your Reference: RWE Renewables Ireland Limited



Distribution

0 9 APR 2025

Job No:

Correspondence No:

Comment:

Fehily Timoney & Company Rita Mansfield Core House Pouladuff Road Cork Co. Cork T12 D773

Date: 08 April 2025

Re: 11 no. turbine wind farm and associated infrastructure.

Located within the townlands of Beagh More, Cloonbar, Cloonnaglasha, Corillaun, Derrymore, Shancloon, Toberroe and Tonacooleen, County Galway

Dear Sir / Madam,

I have been asked by An Bord Pleanála to refer further to the above-mentioned pre-application consultation request.

Please find enclosed a copy of the written record of the meeting of the 12/03/2025.

If you have any queries in the meantime, please contact the undersigned officer of the Board or email <a href="mailto:sids@pleanala.ie">sids@pleanala.ie</a> quoting the above mentioned An Bord Pleanála reference number in any correspondence with the Board.

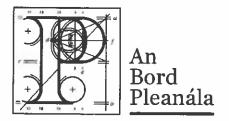
Yours faithfully,

Raymond Muwaniri Executive Officer

Direct Line: 01-8737125

VC07

**Emall** 



# Record of 1<sup>st</sup> Meeting ABP-321495-24

Case Reference / Description	ABP-321495-24 - 11 no. Turbine Wind Farm and Associated Infrastructure, located within the townlands of Beagh More, Cloonbar, Cloonnaglasha, Corillaun, Derrymore, Shancloon,			
C T	Toberroe and Tonacooleen, County Galway.			
Case Type	Pre-application Consultation			
1 <sup>st</sup> / 2 <sup>nd</sup> / 3 <sup>rd</sup> / 4 <sup>th</sup> Meeting	1st			
Date	12/03/2025	Start Time	11:50 hrs	
Location	Virtual	End Time	12:00 hrs	

Representing An Bord Pleanála		
Staff Members		
Una Crosse, Assistant Director of Planning (Chair)		
Una O'Neill, Senior Planning Inspector		
Emmet Smyth, Senior Scientist		
Raymond Muwaniri, Executive Officer		

Representing the Prospective Applicant	
Rita Mansfield, Fehily Timoney	
Robyn Nicholl, Fehily Timoney	
Matt Geraghty, RWE Renewable Ireland Ltd	
Michael James, RWE Renewable Ireland Ltd	
Cliona O'Sullivan, RWE Renewable Ireland Ltd	

ABP-321495-24 An Bord Pleanála Page 1 of 4

### Introduction

The Board referred to the letter received from the prospective applicant on the 16<sup>th</sup> of December 2024 requesting pre-application consultations under Section 37CC of the Planning and Development Act 2000, as amended, and advised the prospective applicant that the first meeting 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 will serve notice at the conclusion of the process as to the strategic infrastructure status of the proposed development. It may form a preliminary view at an early stage in the process on the matter.
- A further meeting or meetings may be held in respect of the proposed development.
- Further information may be requested by the Board and public consultations may also be directed by the Board.
- The Board may hold consultations in respect of the proposed development with other bodies.
- 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.

ABP-321495-24 An Bord Pleanála Page 2 of 4

### Presentation made by the prospective applicant:

The prospective applicant outlined the unconfirmed details of the proposed development for which they are seeking design flexibility under Section 37CC of the Planning and Development Act 2000, as amended.

• The prospective applicant has sought flexibility on the turbine dimensions - tip height 179.25m / 180m / 180m), the rotor diameter (149.1m / 150m / 155m) and the hub height (104.7m / 105m / 102.5m)

#### Discussion:

- The Board's representatives requested that the prospective applicant outline the rationale for seeking a design flexibility opinion on unconfirmed details.
- The prospective applicant outlined the following:
  - Exact make and model of turbines will not be known until the outcome of the tender process at time of procurement.
  - Future proofing and flexibility for turbine make and model is required to ensure most up to date technology is employed and avoid market dominance by any one particular brand/manufacturer.
  - Lengthy lead in times from planning to construction and operation,
     therefore flexibility in turbine design is necessary.
- It was also noted by the Board's representatives that it was their preliminary view that the maximum export capacity was not a matter subject to the flexibility provisions.
- It was noted by the Board's representatives that the design flexibility file and details therein remain confidential until an application is made.

ABP-321495-24 An Bord Pleanála Page 3 of 4

#### Conclusion:

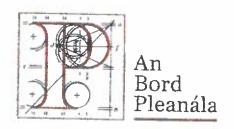
The Board's representatives advised that the record of this meeting will be issued following the meeting, and any comments can be forwarded in writing to the Board. Following circulation of the meeting record, the prospective applicant is requested to respond to the Board to acknowledge receipt of same such that the consultation process can be closed and the matter forwarded to the Board for determination of the request.

**Una Crosse** 

**Assistant Director of Planning** 

Our Case Number: ABP-321507-24

Your Reference: RWE Renewables Ireland Limited



Fehily Timoney & Company Rita Mansfield Core House Pouladuff Road Cork Co. Cork T12 D773

Date: 08 April 2025

Re: 11 no. turbine wind farm and associated infrastructure.

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Yours faithfully,

Raymond Muwaniri **Executive Officer** 

Direct Line: 01-8737125

VC07

FEHILY TIMONEY & Co.

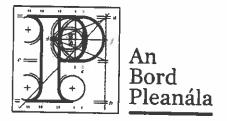
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ABP-321507-24 An Bord Pleanála Page 2 of 6

## Presentation made by the prospective applicant:

RWE has been involved in the Energy Sector for 120 years, focusing on wind energy, solar power and battery storage in Ireland. The site location is approximately 154ha in size and located 8km northwest of Tuam and 3.5km east of Shrule. RWE is proposing 11 no. turbines with individual power outputs of between 5.6 to 6.6MW, 110kV onsite substation and a loop in connection to the existing Cashla Dalton 110kV overhead line. All turbines are located within the 'Open to Consideration' zoning classification for Wind Energy, outlined in the Galway County Development Plan 2022 – 2028. Average wind speed in the area is 6m/s.

A small portion of the site falls within a flood zone, and a detailed Flood Model will be prepared. Noise will be assessed within the Environmental Impact Assessment Report (EIAR) and a limit of 43dB has been assumed or +5dB above background, and 40dB for low noise areas has been adopted. 3 locations above daytime levels have been identified. The Landscape and Visual Impact Assessment (LVIA) has been based on rotor diameter of 155m, and tip height of 180m. A total of 21 no. viewpoints have been identified and due to the gently rolling landscape there is limited locations with sufficient elevation to have visibility of the turbines above hedgerows and treelines.

The wind farm will be cumulatively assessed against surrounding developments within a 20km radius. There is 1 no. existing wind farm within the study area (Clonlusk), and 2 no. at planning stage (Laurclavagh and Clonberne).

ABP-321507-24 An Bord Pleanála Page 3 of 6

#### Discussion:

- The Board's representative noted the proposed development was the subject of a previous pre-application process, which is now closed, for a similar scaled development which was determined to be SID. The applicant was requested to provide an update with respect to surveys undertaken, including in relation to biodiversity, and all other technical aspects of the proposal since the previous consultation process was closed. The prospective applicant stated surveys were ongoing since the previous pre-application consultation was held with the Board, with the last round of surveys undertaken in November 2024.
- Some turbine locations have been revised due to the presence of bats.
- The prospective applicant was advised to clearly set out the baseline guidance and methodology applied to assessments within the planning application documentation.
- The prospective applicant outlined that their LVIA chapters would refer to the
  design flexibility options proposed. The Board's representative advised them to
  ensure the impacts of all options are examined in the EIAR, and to consult the
  planning authority in relation to viewpoints chosen.
- The prospective applicant stated that the limited area of Annex I habitat identified within the site area is highly degraded. Floating roads are proposed in certain areas, limiting the potential impact on peat and raised bog.
- One badger sett has been identified on the site no potential damage anticipated,
   with biodiversity enhancement proposed within the site to ensure net
   biodiversity gain.
- The prospective applicant outlined the proposed drainage strategy site and outlined that the Office of Public Works were satisfied.
- The turbine delivery route is being examined by the Road's Department of Galway County Council.
- The Board's representative highlighted the importance of consultation with prescribed bodies, including inter alia the National Parks Wildlife Services.

ABP-321507-24 An Bord Pleanála Page 4 of 6

- The Board's representative noted Canadian pondweed, which is an invasive species, was previously identified throughout the site which it was advised should be considered as part of the application.
- The Board's representatives enquired if surveys showed presence of species
  associated with European sites in the wider area. The prospective applicant
  stated that bird surveys have been ongoing since 2021. Raptors and ground
  nesting birds can be found in the area, but low collision risk for the site.
- The cumulative assessment undertaken should address all environmental factors comprehensively.
- The Board's representative identified two watercourses at risk and enquired about any potential impacts anticipated to ground water quality, as well as any potential dewatering processes. The prospective applicant outlined their proposal to clear a small forest area to provide a sediment pond, nutrient runoff control, and the implementation of a diffuse filter to separate the clean and dirty water onsite. Gravity Foundation dewatering is proposed.
- In relation to noise, the prospective applicant was advised to clearly highlight
  where mitigation is proposed, for example by way of curtailment. Application
  documentation should consider the current and draft Wind Energy Guidelines,
  or any update at the time of the application.
- The prospective applicant intends to submit one application to include the wind turbines and electricity infrastructure, under section 37E of the Planning and Development Act 2000, as amended.

ABP-321507-24 An Bord Pleanála Page 5 of 6

#### Conclusion:

The Board's representatives advised that onus is on the prospective applicant to either request a further meeting or formal closure of the instant pre-application consultation process. The Board's representatives advised that the record of the instant meeting will be issued in the meantime and that the prospective applicant can submit any comments it may have in writing or alternatively bring any comments for discussion at the time of any further meeting.

Una Crosse

**Assistant Director of Planning** 

ABP-321507-24 An Bord Pleanála Page 6 of 6