Our Case Number: ABP-319139-24

Your Reference: Garrane Green Energy Limited

An Bord Pleanála

Jennings O'Donovan & Partners
Finisklin Business Park
Finisklin
Sligo
Co. Sligo
F91 RHH9

Date: 15 May 2024

Re: 9 no. wind turbines, grid connection, an energy storage facility and all associated site works.
Located in the townlands of Garrane, Ballynagoul, Creggane and Charleville, Co. Limerick.

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 30th of April, 2024.

If you have any queries in relation to the matter please contact the undersigned officer of the Board.

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

pp RECM

Raymond Muwaniri
Executive Officer
Direct Line: 01-8737125

PC07

JENNINGS O'DONOVAN
& PARTNERS LIMITED
Finisklin Business Park, Sligo.
16 MAY 2024
RECEIVED

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An Bord Pleanála

Record of 1st Meeting ABP-319139-24

Case Reference / Description	ABP-319139-24: 9 No. wind turbines, grid connection, an energy storage facility and all associated site works in the townlands of Garrane, Ballynagoul, Creggane and Charleville, Co. Limerick.		
Case Type	Pre-Application Consultation		
1st / 2nd / 3rd / 4th Meeting	1st Meeting		
Date	30/04/2024	**Start Time**	11:00 a.m.
Location	Virtually	**End Time**	12:15 p.m.

Representing An Bord Pleanála
Staff Members
Stephen Kay, Assistant Director of Planning (Chair)
Robert Speer, Senior Planning Inspector
Raymond Muwaniri, Executive Officer

Representing the Prospective Applicant
Larry O'Halloran, Project Manager
David McDonnell, Project Director
David Kiely, Jennings O'Donovan, and Partners
Andrew O'Grady
John Doogan
Richard Baker, Macroworks
Michael Gill

Introduction

The Board referred to the letter received from the prospective applicant on the 19th of February, 2024 requesting pre-application consultations under section 37B of the Planning and Development Act 2000, as amended, and advised the prospective applicant that the instant meeting essentially 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.

Presentation by the prospective applicant:

Greensource Ltd. is the parent company for the prospective applicant, Garrane Green Energy, an Irish indigenous company operating since 1999. A team of 30 people are working on this project, supported by Jennings O'Donovan Consulting Engineers, Hydro Environmental Services, and John Cronin & Associates, amongst others. The prospective applicants outlined how it is considered that the proposed project is in line with EU and national policy and accords with identified objectives of the Limerick County Development Plan, 2022-2028.

The prospective applicants outlined how the proposed development has the potential to provide up to 54MW of renewable electricity or power for up to 37,000 homes, representing approximately 0.6% of the national onshore target for 2030. The proposed site is located on agricultural lowlands, close to the border with County Cork, and proximate to the N20 National Road, in the townlands of Garrane, Ballynagoul, Creggane, Charleville, County Limerick. It is proposed to install 9 No. wind turbines with a tip height of up to 185m, each producing approximately 6 - 7.2 MW, with a combined output of up to 54MW.

The prospective applicant set out the main constraints informing the design and these include: a setback buffer of 680m from sensitive receptors; a hydrological buffer of 50m from watercourses and 10m from land drains; archaeological feature buffers; the site location within a fluvial flood zone: telecom links passing through the site; and access to the N20 National Road. The prospective applicant is proposing a 'Loop in' grid connection to the existing 110kV overhead lines to the south of a new proposed 110 kV substation, and a Battery Energy Storage System (up to 150MW) to be located close to the proposed substation. The proposed Turbine Delivery Route to the site is via the N69, M20 and N20. A Road Safety Audit is being undertaken, and access via the N20 will only be for abnormal load deliveries and general construction access until a bridge over the River Maigue is constructed.

Progress to date includes an ongoing ornithological survey, baseline desktop and field studies, and bat and house surveys which have been completed. Grid connection options continue to be assessed. The site is susceptible to flooding, so flood risk management is key. Surface and ground water protection are also key for this project and must be shown in the EIAR. In relation to landscape and visual

considerations, agriculture is the main land use in the area and these agricultural lowlands are a preferred area for wind production. The prospective applicant outlined how the site location is close to the border with Cork County and how within Co. Cork there is a higher value landscape designation to the east of the N20 wherein wind energy development is classified as not normally accommodated. The landscape type on the County Limerick side is not a high value landscape and wind energy development is acceptable.

Garrane Green Energy Ltd. intends to prepare visibility maps showing the extent of the zone of theoretical visibility and to screen out areas that are not in view. There are 28 No. selected viewpoints and a zone of theoretical visibility (ZTV) with a 10km radius around the site has been investigated. There are designated scenic views in the wider area, but none near the site. A road screening analysis will be carried out to take account of screening from vegetation and this will likely show a significantly reduced visual extent compared to that on the ZTV map.

The applicant has implemented a community engagement plan which includes ongoing surveys, door to door engagement within a 2km radius and the hosting of public events. It will also offer individual meetings, phone and email support, newspaper and press activity. There is currently a placeholder website, but the applicant is working on the actual website which will be uploaded in the coming weeks.

Discussion:

- The Board's representatives queried the development's combined output of 54MW, and asked if this level of output was potentially going to change or could be below the 50MW threshold set out in the Seventh Schedule. They also enquired about the 150MW Battery Energy Storage System (BESS) and how it would operate.
- The prospective applicant replied that they were initially looking at different designs including one that included development on both sides of the N20. It was stated that 2 scenarios i.e. 9 turbine and 7 turbine layouts, both

producing above 54MW were examined and that the 9-turbine layout as presented in the pre application consultation and associated presentation was the preferred option. The prospective applicant confirmed that even if the number of turbines was to be reduced to 7 no. That output would exceed 50 MW based on the use of a 7.2MW output, 185-metre-high turbine.

- The prospective applicant stated that the BESS was proposed to be a long duration energy storage facility and that it was looking at 2 transformers with the battery system to be separate from the wind farm.
- The Board's representatives questioned if the applicant was considering making a separate application under section 182B of the Act for the grid connection. The prospective applicant indicated that it was likely that they would seek to progress the entire project under a s.37 application, however this is yet to be confirmed. The Board representatives noted that the Board had previously accepted applications that incorporated both wind energy and grid connection infrastructure under s.37, however the final decision on the most appropriate way in which to present such applications lies with the prospective applicant informed by their own advice.
- The Board's representatives noted the battery electric storage system (BESS) element of the proposed development and stated that their preliminary view was that this aspect of the project could be accepted under s.37 of the Act on the basis that it came within the scope of the Energy Infrastructure class of development set out in the Seventh Schedule of the Act comprising *'an installation for the harnessing of wind power for energy production ....'*. The Board's representatives stressed that this was their preliminary opinion on this issue, that there was very limited precedent in terms of Board decisions on similar questions and that the final decision would rest with the Board.
- The Board's representative reiterated to the prospective applicant that it must be certain the project will produce over 50MW. They added that an Environmental Impact Assessment Report (EIAR) and screening for Appropriate Assessment would be required (with Stage 2 Appropriate Assessment, if necessary) and that there was the potential for hydrological connectivity impacts. Regard should be had to the 'Wind Energy Development, Guidelines for Planning Authorities, 2006' and the 'Draft Wind

Energy Guidelines, 2019' as appropriate. The Board representatives noted that there were archaeological and heritage sites in the area and that it would be necessary to consider these in any application. The representative also referred to the access from the N20 National Road and advised of the need to consider the provisions of the 'Spatial Planning and National Roads, Guidelines for Planning Authorities'. The prospective applicant was advised that the views of TII should be sought regarding the proposed access, notwithstanding the fact that the main construction access would be from an alternative location.

- The Boards representatives stated that flood risk management will be a key issue and the prospective applicant would need to consider that the proposed turbines appear to be situated on lands at risk of flooding (it is noted that the proposed substation appears to fall outside any identified floodplain). Consideration should also be given to the necessary setbacks from residential properties / noise sensitive receptors and any potential impacts on residential amenity.
- The prospective applicant stated that they were considering submitting a request for a design flexibility opinion from the Board due to the changes in technology over time and asked the Board's representatives for their comments. The Board's representative stated that to date the Board had received 3 to 4 applications for design flexibility relating to onshore wind energy projects and that these requests focussed primarily on the dimensions of the proposed turbines. The Boards representatives stated that the prospective applicant may consider options for design flexibility relating to the proposed turbines pursuant to Sections 37CC & 37CD of the Act. The prospective applicant was reminded that once the pre-application process was closed out, the applicant would not be able to apply for design flexibility and would have to start the process over again. In addition, the prospective applicant was reminded that any request for design flexibility would be the subject of a single meeting and that the determination of the Board on the request would be based on the information received with the request and any information presented at the single design flexibility meeting. Accordingly, the

prospective applicant should be careful to ensure that they were clear in terms of the scope of their flexibility request when seeking a flexibility opinion.

- A discussion was had regarding the potential for flexibility relating to the battery electric storage element of the project. The prospective applicants stated that they had not finally determined whether flexibility would be required on this aspect of the project, however given the timeline of projects and developments in battery technology it may be that additional equipment and or battery capacity could be accommodated within the footprint of the BESS compound indicated. The Boards representatives stated that their initial thoughts on this issue would be that if there was potentially going to be a situation where additional plant or equipment or larger structures might be sought within the compound then maybe this is something that could be the subject of a design flexibility opinion request. In the event that no structural changes were likely and changes in technology leading to increased output would not require larger structures or other physical changes within the BESS compound then potentially this would not need to be covered by a design flexibility opinion.
- The Boards representatives highlighted the fact that there is a separate design flexibility process included under section 182 of the Act (182F/G refers). Therefore, in the event that flexibility was being sought for aspects of the grid connection and transmission infrastructure, this would most appropriately be undertaken under s.182F/G of the Act and would mean that the grid connection and substation aspects of the proposed development would also need to be made under section 182. In other words, two applications (under s.37 and s182) would be required in such a scenario.
- The prospective applicant asked for a timeline if they were to consider another consultation meeting under s.182 of the Act. The Board representatives stated that this could hopefully be accommodated within a reasonable timeframe and noted that a significant number of the relevant issues would already have been discussed under this pre application consultation. Similarly, the Board's representatives stated that a meeting on foot of any design flexibility opinion request could be accommodated within a reasonable timeframe.

- The prospective applicants noted the dynamic nature of energy projects such as that the subject of this pre application consultation and the desirability that this would be accommodated in the application / consenting process. The Boards representatives acknowledged both the fast developing nature of such projects and the fact that the design flexibility process aims to account for such scenarios. Notwithstanding this however, the requirements of the legislation and especially the distinction between s37 and 182 process where flexibility is being sought was highlighted by the Board's representatives.
- The Board's representatives stated their preliminary opinion is that the proposed development as presented under s.37 would constitute strategic infrastructure development but noted that the ultimate decision is a matter for the Board.
- The Board's representatives concluded the meeting by noting that the main issues for consideration in any future application were those relating to compliance with the wind energy and landscape strategies (in particular noting the landscape designations in the adjacent areas of County Cork), flooding, access to the site and in particular the impact on the N20 and compliance with the 2006 and draft 2019 wind energy guidelines. Given the information presented and the outstanding design aspects requiring finalisation it was anticipated that a further meeting(s) would be required. In addition, the prospective applicant may wish to consider their desired approach regarding the application and design flexibility.
- The prospective applicants stated that they would consider the issues discussed including their requirement for / scope of a design flexibility opinion following which they would revert to the Board as to how they wished to proceed with the consultation.

Conclusion:

The Board's representatives advised that the 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.

Stephen Kay

Stephen Kay

Assistant Director of Planning

Our Case Number: ABP-319139-24

Your Reference: Garrane Green Energy Limited

An Bord Pleanála

Jennings O'Donovan & Partners
Finisklin Business Park
Finisklin
Sligo
Co. Sligo
F91 RHH9

Date: 20 September 2024

Re: 9 no. wind turbines, grid connection, an energy storage facility and all associated site works.
Located in the townlands of Garrane, Ballynagoul, Creggane and Charleville, Co. Limerick.

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 6th September 2024.

If you have any queries in relation to the matter please contact the undersigned officer of the Board.

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Raymond Muwaniri
Executive Officer
Direct Line: 01-8737125

PC07

JENNINGS O'DONOVAN
[redacted] & PARTNERS LIMITED
Finisklin Business Park, Sligo.
24 SEP 2024
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64 Marlborough Street
Dublin 1
D01 V902

An Bord Pleanála

Record of 2nd Meeting
ABP-319139-24

Description	9 No. wind turbines, grid connection, an energy storage facility and all associated site works in the townlands of Garrane, Ballynagoul, Creggane and Charleville, Co. Limerick.		
Case Type	Pre-Application Consultation		
1st / 2nd / 3rd / 4th Meeting	2nd Meeting		
Date	06/09/2024	**Start Time**	11:00 a.m.
Location	Virtually	**End Time**	11:40 a.m.

Representing An Bord Pleanála
Staff Members
Una Crosse, Assistant Director of Planning (Chair)
Robert Speer, Senior Planning Inspector
Raymond Muwaniri, Executive Officer
Representing the Prospective Applicant
Larry O'Halloran, Project Manager Garrane Green Energy
David McDonnell, Director Garrane Green Energy
David Kiely, Director Jennings O'Donovan & Partners
Andrew O'Grady, Project Manager Jennings O'Donovan & Partners
John Doogan, Consultant
Tomas Leen, Assistant Project Manger
Nicholas Lyons

Introduction

The Board referred to the letter received from the prospective applicant on the 19th of February, 2024 requesting pre-application consultations under section 37B of the Planning and Development Act 2000, as amended, and advised the prospective applicant that the instant meeting essentially 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.

Presentation by the prospective applicant:

The prospective applicant provided a recap of the 1st meeting including the principle planning considerations arising. It was outlined that the proposed development of a 9 turbine windfarm with an output of up to 54MW, a proposed 'loop in' connection to the existing 110kV overhead line at a location to the south of a proposed 110kV substation would not now include the originally proposed Battery Energy Storage System (BESS) with the application having further considered matters such as the drainage regime and the buffer zones available.

The design principles were outlined including mitigation by avoidance, minimising habitat loss and safeguarding against the potential for increased local and downstream flood risk, safety considerations for access and egress to the N20 and utilising existing infrastructure. Opportunities to capitalise on biodiversity enhancement were also noted

The development as now proposed comprises 9 turbines with a 680m setback, 170m tip height (172m within identified flood zones). The assessment will consider 2 turbine models with 149m and 150m rotor diameter, with total capacity of 51.3MW (149m) and 54MW (150m), but permission would be sought for one model.

It is proposed to lodge the application for all the elements of the proposal under Section 37 and there would be no Design Flexibility request. The prospective applicant outlined the basis for their opinion that the proposed development would constitute Strategic Infrastructure Development.

Discussion:

- The Board's representatives noted that the development proposal was largely unchanged from that previously proposed with the amendments outlined in the presentation as outlined above.
- The Board's representatives enquired as to the strategy proposed for the consideration of turbine type with the prospective applicant stating that they had narrowed their assessment of the proposed development to 2 turbine types, at lower heights. The prospective applicant outlined that they have decided to focus on 1 turbine design and would not be pursuing the design flexibility option.

- The Board's representative reiterated to the prospective applicant that they need to ensure that the EIAR and NIS robustly address the matters arising. A flood risk assessment would be required and the EIAR should address matters such as flood risk in respect of their consideration of geotechnical matters, land and soil and water in particular.

- The Board's representatives also noted that the difference in levels of a number of the proposed turbines, to address flood levels on the site, should be reflected in the consideration of other factors such as visual impact and ornithology.
- The prospective applicant enquired about the timeline for determination, to which the Board's representative replied that it was not possible to give a timeline but that the Board were endeavouring to be as expeditious as possible in determining the consultation requests and that once the prospective applicant seeks closure of the pre-application process, the inspector would prepare and discharge the report for the consideration and determination of the Board.

Conclusion:

The Board's representatives advised that the 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

Our Case Number: ABP-319139-24

Your Reference: Garrane Green Energy Limited

An Bord Pleanála

Jennings O'Donovan & Partners Limited
Finisklin Business Park
Finisklin
Sligo
Co. Sligo
F91 RHH9

Date: 18 October 2024

Re: 9 no. wind turbines, grid connection, an energy storage facility and all associated site works.
Located in the townlands of Garrane, Ballynagoul, Creggane and Charleville, Co. Limerick.

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 4th of October 2024.

If you have any queries in relation to the matter please contact the undersigned officer of the Board.

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

pp HCM

Raymond Muwaniri
Executive Officer
Direct Line: 01-8737125

PC07

JENNINGS O'DONOVAN
& PARTNERS LIMITED
Finisklin Business Park, Sligo.
21 OCT 2024 scan
Andrew
DK, SL, Breena & Sarah Jones
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Ríomhphost	**Email**	bord@pleanala.ie

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An Bord Pleanála

Record of 3rd Meeting
ABP-319139-24

Case Reference / Description	ABP-319139-24		
Case Type	Pre-Application Consultation		
1st / 2nd / 3rd / 4th Meeting	3rd Meeting		
Date	04/10/2024	**Start Time**	11:00 a.m.
Location	Virtually	**End Time**	11:30 a.m.

Representing An Bord Pleanála
Staff Members
Una Crosse, Assistant Director of Planning (Chair)
Robert Speer, Senior Planning Inspector
Raymond Muwaniri, Executive Officer

Representing the Prospective Applicant
David McDonnell, Project Director Garrane Green Energy
David Kiely, Consultant Jennings O'Donovan & Partners
Larry O'Halloran, Project Manager Garrane Green Energy
Tomas Leen, Assistant Project Manager

Discussion:

- The Board's representatives outlined that the purpose of the meeting was to seek clarification in respect of the design strategy for the proposed turbines. It was outlined by the Board representatives that without entering the Design Flexibility process that an application could be made on the basis of 1 turbine type and that the assessment of same in the EIAR and any NIS would be concerned only with the turbine type for which permission is sought.
- Consideration of options within the EIAR/NIS can only be facilitated if the design flexibility process is undertaken.
- The Board's representative advised the prospective applicant that they are welcome to seek their own legal advice on the matter, but that the Board's position was to either request Design Flexibility or to seek permission and assess 1 turbine type.
- The prospective applicant outlined that when they commenced the pre-application process, there was no Design flexibility provisions, and they are still considering the most appropriate way forward.
- The prospective applicant enquired about the Design Flexibility process which the Board's representatives outlined.

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