

Mr. Rory Kelleedy
Executive Officer
An Bord Pleanála
64 Marlborough St
Dublin 1
D01 V902

Our Ref: P21-143/Ltr/CC/AMW

9 March 2023

Re: Response to Notice issued on the 13th May 2021 under Section 132 of the Planning & Development Act, 2000, (as amended) by An Bord Pleanála to Arran Windfarm Limited regarding a Proposed Substation at Barnadivane (Kneeves), Teerelton, County Cork (An Bord Pleanála Reference. ABP-308208-20).

Dear Rory,

Please find enclosed 10 no. copies of our submission response to the Information requested by An Bord Pleanála (the Board/ABP) on the 13th May 2021 for the proposed development of a 110kv electricity substation compound and accompanying infrastructure at Barnadivane (Kneeves), Teerelton, County Cork.

Our submission response includes the following updated material:

- Environmental Impact Assessment (EIA) Scoping Report
- Environmental Impact Assessment Report (EIAR)
- Planning Drawings
- Appropriate Assessment Screening & Natura Impact Statement
- Construction Environmental Management Plan
- Photomontages

In addition to the material included within our submission response, please find below further detail with regard to specific queries raised in the Board's notice dated 13th May 2021:

1. **Having regard to the number of submission of the file and the elapse of time, the Board considers that it would be of benefit to the parties and the Board to have available a single point of reference which constitutes the applicant's case on the topic of noise. It is also considered appropriate in view of the High Court judgement that you are presented with an opportunity to revise or update that section of the Environmental Impact Assessment Report (EIAR).**

In that context, you are requested to:

- (a) **provide a consolidated and updated section of the Environmental Impact Assessment Report as it relates to noise:**

Response - Please see enclosed Chapter 9 of The updated EIAR which specifically assesses the impacts of noise and vibration from the Proposed Development on the environment.

- (b) **provide a separate response to the submissions made by appellants and observers on the topic of noise, and**

Response - Please see enclosed Chapter 9 of The updated EIAR which comprehensively addresses submissions made by appellants and observers on the topic of noise.

- (c) **the submission under (a) and (b) above should have regard to the emerging policy context and the most up to date knowledge.**

Response - Chapter 9 of The updated EIAR enclosed considers the most up to date and legally relevant policy context at the time of writing.

2. **You are requested to identify, describe and assess any changes in the environment or policy context, including the planning history and legislation which may warrant an update to, or revision of, the Environmental Impact Assessment Report and/or the Environmental Report and to provide additional information and revise the documents accordingly.**

Response - Please see enclosed Chapter 3 of the updated EIAR which assesses the policy context of the Proposed Substation and relevant legislation at the time of writing. Chapters 2 and 4 of the enclosed updated EIAR include the planning history of the site, including previous consultations carried out in relation to the Proposed Substation. Appendix 1.2 of the enclosed updated EIAR provides an updated list of projects considered cumulatively, thereby providing detail on the planning history of the surrounding area.

3. **You are requested to review the landscape and visual impact chapter of the EIAR and the accompanying photomontages to ensure that they are up to date and that they provide a robust consideration of cumulative impacts.**

Response - Please see enclosed Chapter 8 of The updated EIAR which specifically assesses the landscape and visual impacts of the Proposed Substation. Appended to this Chapter are 3 no. Appendices including photomontages, zone of theoretical visibility mapping and the visual impact appraisal, all of which consist of a robust consideration of cumulative landscape and visual impacts.

- 4. Regarding landscaping of the substation site, it is considered that this should incorporate dense planting on earthen berms where possible. You are requested to provide a detailed plan, which may include lands outside the site boundary, for the purpose of providing screening landscaping with berms. Any required letter of consent should be provided and the relevant lands should be outlined in blue on the application documentation.**

Response - Please see Drawing No. P21-143-0101-0123 which details the proposed landscaping around the substation site and within the redline boundary and blueline boundary which remain the same as the original application. As such, no additional landowner letters of consent are required.

- 5. You are invited to clarify the purpose of the proposed substation in the context of the comments made by third parties relating to the potential role of other permitted substations.**

Response - As stated in the updated EIAR included as part of this submission response, in the event that the loop-in loop-out connection to the 110kV overhead line (OHL) becomes unviable, the permitted underground cabling will provide an alternative means of connecting the Proposed Wind Farm to the National Grid at the Carrigdangan 110kV substation, which was granted permission on the 28th October 2016 (Cork County Council Ref. 15/730 & ABP Ref. PL04.246353).

- 6. With respect to the application of the 2011 or 2014 Directive, you are requested to review the 2014 Directive and supporting regulations, and are invited to provide supplementary documentation to support the EIAR, where appropriate.**

Response - An Environmental Impact Statement (EIS) was originally prepared for the Proposed Wind Farm in 2014. The EIS was prepared pursuant to the 2011 Directive. We include now an EIAR prepared in accordance with the 2011 Directive as superseded by the 2014 Directive and confirm that the EIAR and its supplementary documents including updated planning drawings comply with the Directive and supporting regulations.

Please also note that the locations of Turbine 5 and Turbine 6 have moved slightly due to technological advancements and the turbine manufacturer's civil requirements.

- 7. You are invited to make a submission addressing the issue of project splitting in the context of other wind energy developments in the area and the proposed substation. You should also ensure that the EIAR provides a robust assessment of cumulative impacts.**

Response - Enclosed within this submission response is an updated EIAR which assesses both the Proposed Wind Farm and the Proposed Substation in-combination, thereby addressing any project splitting concerns in this regard. Each Chapter within this updated EIAR includes a cumulative assessment of impacts which takes account of other wind energy developments in the area.



8. The requirement for EIA for the substation development has been raised by third parties. You are requested to address this in the context of any recent relevant legal cases, the purpose of the substation and the matter of project splitting.

Response - For the purposes of this submission response, the updated EIAR enclosed assesses both the Proposed Wind Farm and the Proposed Substation in-combination.

Concluding Remarks

If you should require any further information, please do not hesitate to contact the undersigned.

Yours sincerely,

A handwritten signature in blue ink that reads "Conor Crowther". The signature is written in a cursive style and is enclosed in a light pink rectangular box.

Conor Crowther

for **Fehily Timoney and Company** acting on behalf of **Arran Windfarm Ltd.**