

AN BORD PLEANÁLA
LDG- 069007-23
ABP- _____
19 DEC 2023
Fee: € 220.00 Type: CHA
Time: 9.00am By: REG POST

To : The Secretary,

An Bord Pleanála,
64 Marlborough Street,
Dublin 1.

Oghery,

Moycullen,

Co. Galway.

17 December 2023

Appeal against the granting of planning permission for an increase in turbine size at Knockranny, Moycullen, County Galway. Galway County Council Planning reference 23/225.

Dear Secretary,

We would like to make the following points in support of an appeal against the granting of planning permission for planning reference 23/225 at Knockranny, Moycullen, County Galway.

1: Invalid noise modelling and impact assessment.

The EAIR for planning application 23/225 states that the noise study conducted in 2013 for planning application 11375 was used for application 23/225. The number of operational wind farms in the area has increased significantly from zero in 2013 to six in 2023. This increase has led to a substantial rise in background noise, predominantly due to turbine and transmission infrastructure/substation noise, with the commissioning of the Ardderroo Wind Farm contributing significantly to this increase. Given the above, we believe that a new noise study should have been conducted in 2023 to accurately capture the noise characteristics of the receiving environment.

Page 32 of the Planners Report (section Chapter 12 Noise & Vibration) notes "*Chapter 12 of the EIAR considers the impact (sic) in relation to noise and vibration of the proposed development where increased heights of turbine, additional vehicular activity on local roads and the extension to substation is proposed. The existing,*

permitted and proposed wind farm developments have been identified within the EIAR study area and the cumulative impact of same considered." We can find no evidence of cumulative noise impacts of permitted and proposed wind farm developments in the EIAR. It appears that the planner was mistaken in their interpretation of the EIAR.

The Draft Wind Energy Guidelines 2019 stipulate that *"planning authorities will require applicants to conduct noise modelling of wind energy development projects in advance of and alongside planning applications. This modelling must demonstrate compliance with the specified noise limits, including any special audible characteristics that may be present. In addition to the wind turbines, the assessment should include details of any transformers, substations, or other ancillary equipment. Moreover, the planning application for a wind energy development must include a noise assessment that, when carried out in accordance with these guidelines, identifies a reasonably foreseeable worst-case scenario."* Given the above, we believe that Galway County Council failed to follow the Wind Energy Guidelines and LARES policy objective 14 by not ensuring that an accurate and reliable noise assessment was conducted. We feel that the Bord should refuse planning permission as a valid, accurate noise assessment was not conducted.

2: Inconsistent visual impact assessment by Galway County Council.

Planning application 13/829 was submitted to Galway County Council in 2013 when the Galway County Development Plan 2015-2021 was in effect. Planning application 23/225 was submitted while the Galway County Development Plan 2022-2028 was in force. The 2022-2028 development plan reclassified the eastern, elevated portion of the Knockranny site as a "Special" landscape sensitivity rating and a "Not Normally Permissible" location. In granting permission for 23/225 Galway County Council granted planning permission for an increase in turbine height in this reclassified landscape. In contrast, the 2023 planners report for Tullaghmore Windfarm near Maam Cross in Galway (PD/2360051) notes that "the Planning Authority would state that having regard to the siting of the proposed development within an area identified as Not Normally Permissible for wind energy to the policies and Galway County Council – Planning Report objectives as set out in the Galway County Development Plan 2022-2028 and The Local Authority Renewable Energy Strategy ('LARES'), the principle of the proposed land use at this location is not deemed acceptable in terms of

strategic land use policy context." The contrasting decisions in the Knockranny and Tullaghmore Wind Farm planning applications demonstrate a lack of consistency in Galway County Council's assessment of planning applications. In both cases, the Council was presented with projects located in areas deemed "Not Normally Permissible" for wind energy development. Yet, the Council approved a height increase for the Knockranny Wind Farm despite its classification as a "Special" landscape sensitivity area. This inconsistency suggests a disregard for LARES Policy Objective 18, which prohibits wind farms from being placed in "Special" landscape sensitivity areas. In view of these inconsistencies, we believe that An Bord Pleanála should refuse planning application 23/225.

3: Inadequate assessment of increased risk of peat slippage.

An Bord Pleanála has previously expressed concerns regarding the potential for peat slippage at the Knockranny site (reference 11/375). While the Planners Report for 23/225 acknowledges the lack of an updated assessment of the impacts of additional peat extraction and deposition, it fails to address the increased risk of peat slippage associated with such extraction. In light of these concerns, we believe that An Bord Pleanála should reject planning application 23/225.

4: Inadequate assessment of individual and in-combination effects on ornithology.

The Planners Report for 23/225 acknowledges that Chapter 10 of the Environmental Impact Assessment Report (EIAR) provides an appraisal of the likely significant effects on the ornithology of the site as a result of the proposed development, namely the increase in turbine height and the provision of an alternative cabling route/grid connection. However, while Chapter 10 does provide survey details, it fails to comprehensively address the incremental negative impact of larger turbines on the ornithological population at the site. For instance, Chapter 10 estimates the golden plover strike rate for the proposed turbines at 21.5/21.8 per annum. Yet, no details are presented for permitted turbines, rendering it impossible to accurately assess the detrimental impact on the golden plover population at the site. Additionally, the EIAR falls short in adequately assessing the cumulative effects of planning application 23/225 in conjunction with existing operational wind farms. Section 10.9.3 of the EIAR makes the unsubstantiated claim that "*No potentially significant negative*

cumulative collision risk, disturbance, displacement or habitat loss effects on any of the key ornithological receptors had been identified with regard to the Proposed Development" without providing any supporting evidence.

Given the above, we believe that Galway County Council fell short of meeting LARES Policy Objective 36 by neglecting to conduct a thorough assessment. Given this, we believe that An Bord Pleanála should reject planning application 23/225.

5: The proposed development would destroy the amenity of the local area.

The proposed site is at a significant elevation to houses in the areas of Knockranny, Oldtown, Pillagh and Knockaunranny. Given the height of the proposed turbines, their proximity to local residences and their elevation relative to these residences we fear that this wind farm will have a severe visual impact on local residences.

We trust that you will give the above your due consideration and will overturn this decision to grant planning.

Yours sincerely,

John Rushe & Annette Collins

05/07/2023



Comhairle Chontae na Gaillimhe
Galway County Council

[E] John Rushe
Oldtown
Moycullen
Galway
H91XD9N

TAG: Uimh. Thag. Pleanála:
RE: Planning ref. no.:

23/225 - PERMISSION for the following: (1) Alterations to the Cnoc Raithní (Knockranny) Wind Farm (Galway County Council Planning Ref. No. 13/829 and An Bord Pleanála Ref. 07.243094 comprising 11 no. wind turbines with an overall ground to blade tip height of 150m (an increase of 19.5m & 9.5m from 130.5m & 140.5m, as previously permitted), a rotor blade length of 68m or 69m & a hub height of 81m or 82m; associated increase in turbine foundations; & omission of permitted on-site 110kV substation & underground cabling; (2) Provision of underground electrical (33kV) & communications cabling connecting the 11 no. wind turbines to the Ardderroo wind farm substation for the purposes of connection to the national grid, including a new cable service track (with watercourse/culvert crossings) & widening of an existing access road; extension of the Ardderroo substation within the existing substation compound, including control building extension, new 110kV transformer & electrical plant & apparatus; (3) All associated site development & ancillary works above & below ground in support of the above, including site drainage & tree felling; (4) An operational period & planning permission duration to align with the existing permission (An Bord Pleanála Ref. 07.243094) is sought. An Environmental Impact Assessment Report (EIAR) & Natura Impact Statement (NIS) have been prepared & will be submitted to the Planning Authority with the application
i mbaile fearainn / in the townland of : Knockranny, Ardderroo, Letter

RIALACHÁIN PLEANÁLA AGUS FORBARTHA,
2001-2002

ADMHÁIL ar AIGHNEAHT nó TUAIRIM atá
FAIGHTE
ar IARRATAS PLEANÁLA

PLANNING AND DEVELOPMENT REGULATIONS,
2001-2002

ACKNOWLEDGEMENT of RECEIPT of
SUBMISSION or OBSERVATION on a PLANNING
APPLICATION

IS DOICIMÉAD THÁBHACHTACH É SEO!

COINNIGH AN DOICIMÉAD SEO GO SÁBHÁILTE.
BEIDH ORT AN ADMHÁIL SEO A THAISPEÁINT
DON BHORD PLEANÁLA MÁS MIAN LEAT
ACHOMHAIRC A DHÉANAMH AR CHINNEADH AN
ÚDARÁIS PLEANÁLA

THIS IS AN IMPORTANT DOCUMENT!

KEEP THIS DOCUMENT SAFELY. YOU WILL BE
REQUIRED TO PRODUCE THIS
ACKNOWLEDGEMENT TO AN BORD PLEANÁLA IF
YOU WISH TO APPEAL THE DECISION OF
THE PLANNING AUTHORITY

Tá aighneacht/tuairim faighte i scríbhinn ó [E] John Rushe ar an 04/07/2023 maidir leis an iarratas pleanála thuas.

Tá an táille cuí de €20 íoctha.

Tá an t-aighneacht/tuairim de réir na forálacha cuí de na Rialacháin um Pleanáil agus Forbairt, 2001 agus cuirfidh an tÚdarás Pleanála san áireamh iad nuair atá cinneadh dhá dhéanamh ar an iarratas pleanála.

AIRE

Tabhair faoi deara gur é an dáta is déanaí do chinneadh ar an gcomhad seo ná 26/07/2023

Má tharlaíonn sé **nach bhfaigheann tú fógra** maidir leis an gcinneadh seo laistigh de **3 – 5 lá den dáta thuas**, déan teagmháil leis an oifig seo ar an bpointe ag

A submission/observation in writing has been received from [E] John Rushe on 04/07/2023 in relation to the above planning application.

The appropriate fee of € 20 has been paid.
The submission/observation is in accordance with the appropriate provisions of the Planning and Development Regulations, 2001 and will be taken into account by the planning authority in its determination of the planning application.

N.B

Please note that the latest date for decision on this file is 26/07/2023

Should you **not receive notification** of this decision within **3 – 5 days of the above date**, please contact this office immediately at 091 509 308 or email at

091 509 308 nó ar ríomhphost ag
planning@galwaycoco.ie, chun a chinntiú go gcloíonn
tú le sprioc amanna achomharc an Bhord Pleanála.

planning@galwaycoco.ie, in order to ensure that you meet
an Bord Pleanála appeal deadlines.

E. Keaveney

Administrative Officer, Planning