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# Graffy Wind Park

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## GRAFFY WIND PARK COMMUNITY REPORT





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# GRAFFY WIND PARK

## COMMUNITY REPORT

SEPTEMBER 2021



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### 1. Introduction

1.1 Under the Draft Revised Wind Energy Development Guidelines (December 2019), wind energy developers are required, in advance of submitting applications for permission, to take active steps to inform local communities, as they begin to develop their proposals and take the views of local communities into account in designing their proposals. The developers must also demonstrate what practical effect that process of engagement has had and set out how the project will perform as a good neighbour in the context of the long-term economic and social development of the community within which it is situated.

1.2 In drafting this Community Report, the following information guidance was considered:

- Draft Revised Wind Energy Development Guidelines December 2019 - Dept of Housing, Planning and Local Government
- Code of Practice for Wind Energy Development in Ireland Guidelines for Community Engagement - Dept Communications, Climate Action & Environment.
- Best Practice Guidelines for the Irish Wind Energy Industry - IWEA March 2012.

1.3 A planning permission was granted in February 2011 for the development of a wind park consisting of 13 turbines (An Bord Pleanála Ref. No: PL 05B.237656) and the development was recently acquired by new owners Cuilfeach Teoranta. The development was reviewed in light of draft Department guidelines and new planning policies in the Donegal County Development Plan 2018-24. It became obvious from the review and the emergence of more efficient wind turbine technologies, which became available since the original application was granted, that proposals to repower the scheme, would need significant amendments to the permitted wind park.



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- 1.4 Prior to drafting an amended scheme, initial discussions with the local community commenced in September 2018 and a representative for the developers, actively engaged with the landowners and others in the community, by individually calling with householders.
- 1.5 As a result of these informal meetings with the local community, several initial issues were raised. The most important issue was a requirement that no overhead lines would be involved in any proposed amendment. In the 1990s the local community had raised concerns about an overhead ESB 110kv line traversing their locality. Further issues in relation to shadow flicker, noise and eventual decommissioning of the wind park, were also highlighted.
- 1.6 As a result of this initial engagement with the local community and taking into consideration changes in wind energy technology, guidelines and policy, the developers decided on a proposal, which provided for the reduction in the number of turbines from thirteen to eight and a change of turbine scale. The project also involved the development of a grid connection to the Tievebrack ESB station to the west and improvements to the delivery route.

## **2. Proposed Development**

- 2.1 To take account of newer and more efficient wind turbine technologies, which have become available since the original application was granted, it was proposed to develop and repower the wind park by reducing the number of turbines to eight (8) larger and more efficient turbines. Initially, the turbine type had yet to be confirmed, but for assessment purposes, a turbine with a maximum hub height of 84m, a maximum blade diameter of 132m and a maximum blade tip height of 150m was proposed.
- 2.2 A planning application (21/51202) was submitted to Donegal County Council on 16<sup>th</sup> June 2021 for the development, but was withdrawn following a High Court JR decision [Sweetman V An Bord Pleanala, Ireland and the Attorney General (2021) IEHC 390],



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which quashed a decision by An Bord Pleanala to grant planning permission for a wind farm in County Longford. The High Court decision determined that the turbine heights and blade lengths were expressed in terms of *maxima* and not the actual proposed dimensions, which was considered unacceptable. As the submitted planning application 21/51202, confirmed *maxima* dimensions for the wind turbine model, the application was withdrawn on 17<sup>th</sup> August 2021.

- 2.3 Two specific turbines models have been identified for the new planning application, which will be submitted shortly. These are the Nordex 133 and the Enercon 126 and their detailed dimensions are outlined below.
- 2.4 The Environmental Impact Assessment Report (EIAR) for the new planning application, assesses both turbine models, which are almost identical, but only one type of the turbine models will be erected. Wind turbine supply is very fluid and due to technical advances, companies frequently cease manufacture of their models. The applicants wish to ensure that at least one of their identified turbines will be available for erection, following a grant of planning permission.

### **Turbine models assessed in EIAR.**

<b>Turbine Model</b>	<b>Hub Height</b>	<b>Rotor Diameter</b>	<b>Blade Tip Height</b>
Enercon 126	85.94 metres	127 metres	149.44 metres
Nordex 133	83 metres	133.2 metres	149.6 metres

- 2.5 The turbine locations will remain at the same locations as in the withdrawn planning application, as will all the other elements of the wind farm proposal, which were included in the withdrawn planning application. Specifying the exact turbine dimensions in the new planning application, is the only change from the withdrawn planning application.
- 2.6 The wind park and associated developments, are proposed to be developed in the vicinity of the permitted wind park in the townlands of Graffy, Meenamanragh, and Dalraghan More, approximately 8.5kms ENE of Glenties, County Donegal, as shown on Map 1 below.

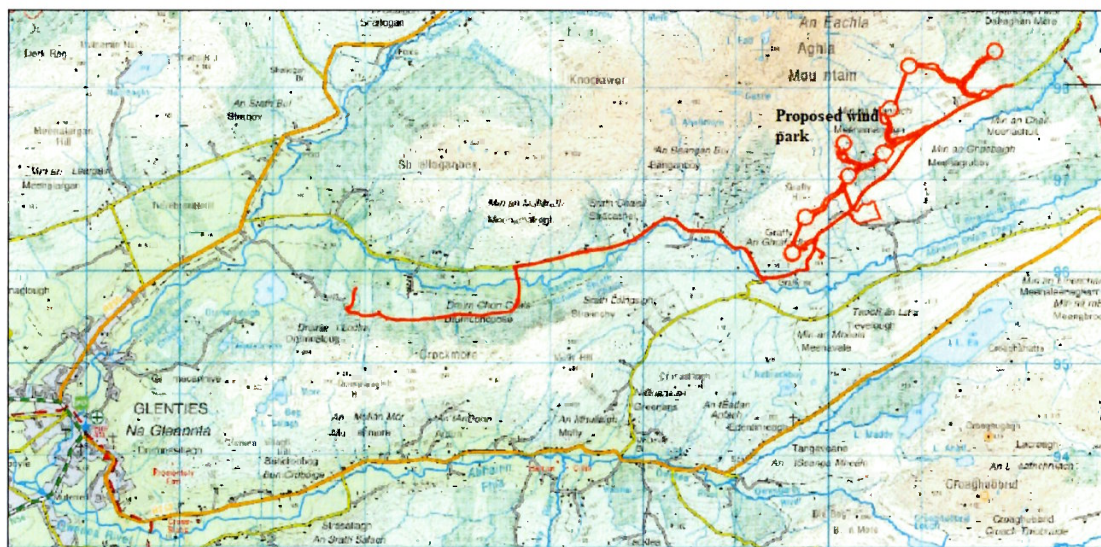




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- 2.7 Access tracks to each turbine, a substation, cables connecting the turbines to the proposed substation, a meteorological mast, peat recovery areas and a temporary construction compound, all form part of the new proposal. In addition, the planning application will include the development of a grid connection from the proposed substation to the Tievebrack ESB station at Drumnalough, approximately 7.5 kms west of the wind park site and upgrade of local roads along the the delivery route (strengthening/widening of verges, easing of corners and extension of culverts) from Lugaveen townland, approximately 5 kms northeast of the wind park site. All cabling and grid connections will be laid underground.



**Map 1: Location of wind park**

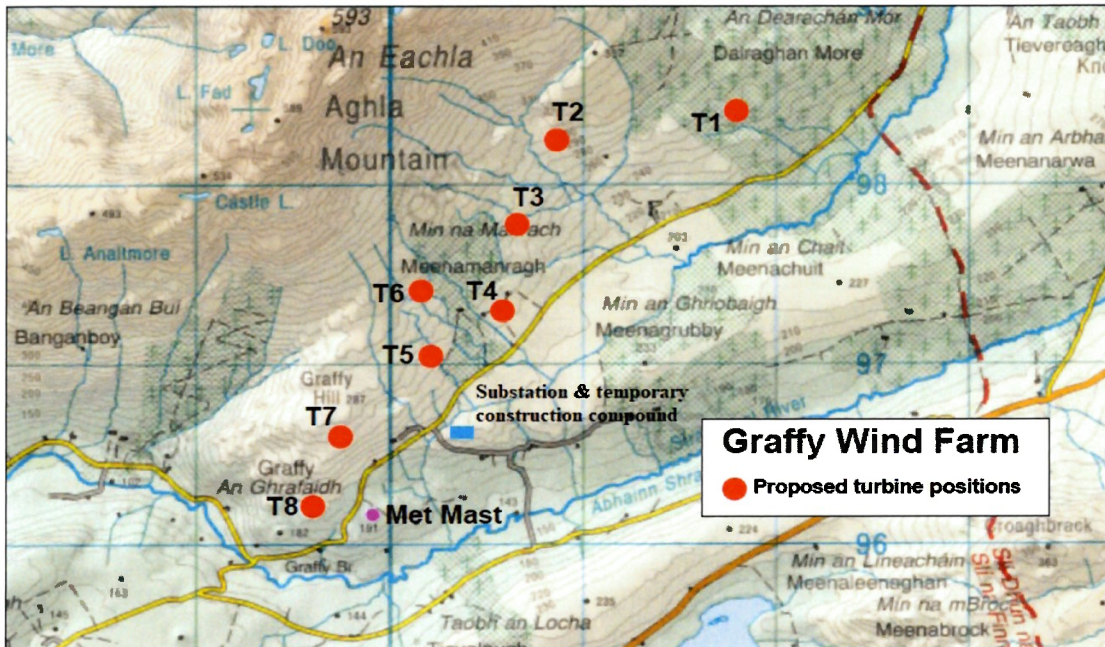
- 2.8 Map 2 below, shows the proposed turbine, substation, temporary construction compound and meteorological mast locations, while Map 3 outlines the grid connection between the proposed substation at Meenagrubby to the Tievebrack Eirgrid station at Drumalough.



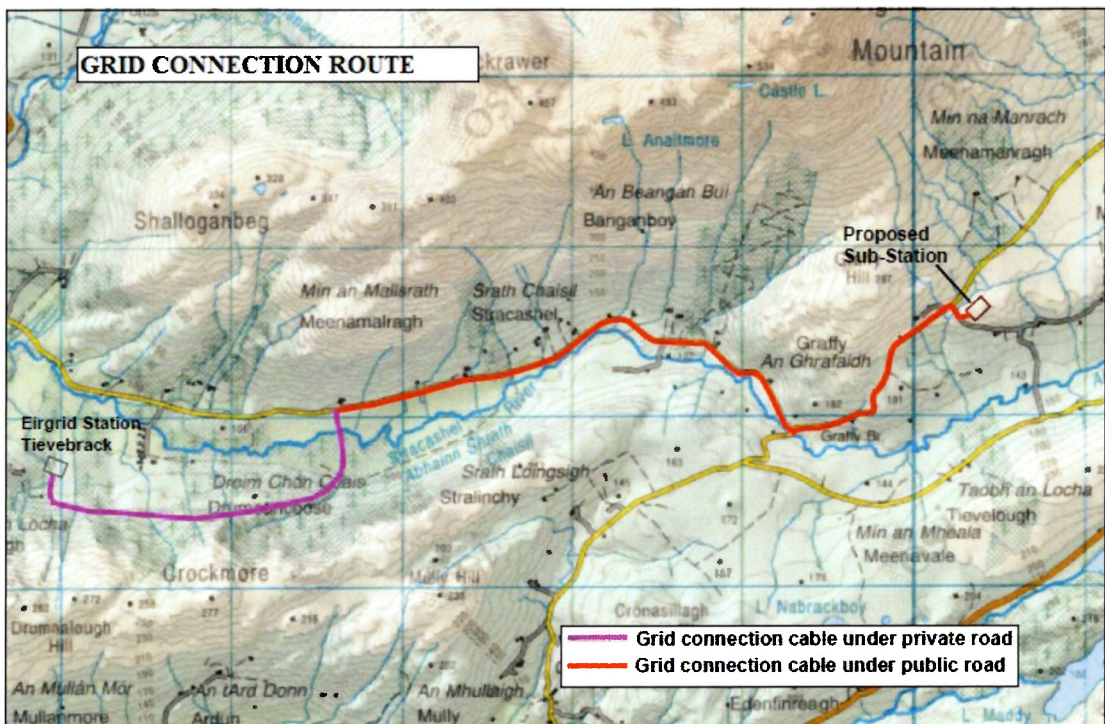


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Map 2: Proposed turbine, substation and meteorological mast locations



Map 3: Grid connection to the Tievebrack Eirgrid station at Drumalough



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### **3. Community Benefits**

- 3.1 A Community Benefit Fund (CBF) will be established upon commissioning of the wind park, which will form a core component of the wind park development, offering a tangible long-term dividend to the community. It is fundamental that the project will be of enduring economic or social benefit to the local community.
- 3.2 The new Renewable Electricity Support Scheme (RESS), provides for a CBF with contributions set at €2/MWh for all generation produced. Subject to its commissioning, it is anticipated that the CBF associated with the project will be in the order of €200,000 per annum.
- 3.3 The developers consider that decisions for making awards from the CBF should be made locally through a local organisation or representative group.
- 3.4 In addition, individual lease payments will be made to landowners, on whose lands, the project is to be constructed. Furthermore, the developers have agreed to make annual compensation payments to households, located within 1 kilometre of any wind turbine. It was considered that households within this radius of any turbine, would be likely to be impacted more than those households further removed.

### **4. Public consultation**

- 4.1 It had been planned to hold a public meeting in the Edeninfagh Hall in early April 2020, but the escalation of the Covid 19 virus and Government advice, restricting contacts by groups of people, prohibited this preferred means of public consultation engagement with the local community.
- 4.2 As an alternative, a public information document, outlining information pertaining to the proposal, was circulated to 71 house owners/occupants in the vicinity of the proposed wind energy development. The document was also circulated to local county



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councillors. The information document included a map of the proposal, a description of the project, an anticipated project timetable and an outline of the environmental and social benefits that the development would have both locally and globally. A pre-paid response letter for the recipients to provide comments was also included with the information letter. A copy of the information document is attached under Appendix A below.

- 4.3 A dedicated website ([www.graffeywindpark.com](http://www.graffeywindpark.com)) for the project was also created to enable comments to be made and also confirming that the website would continue to be available for up-dates on the construction and operation of the project. In addition residents were advised that submissions could be sent by email to [comments@graffywindfarm.com](mailto:comments@graffywindfarm.com). Information on amendments to the turbine models to be used and the withdrawal of the planning application 21/51202, were uploaded to the website and confirmation of the submission of the new planning application, will also be uploaded.
- 4.4 Details of the project were also advertised in three local newspapers circulating in the area, highlighting the project, seeking feed-back and advising that a dedicated website had been created to enable comments to be submitted. The public notice, which is attached under Appendix B, was published in the Derry People/Donegal News on Tuesday 5<sup>th</sup> May, in the Peoples Press on Tuesday 12<sup>th</sup> May and finally in the Donegal Democrat on Thursday 14<sup>th</sup> May. These newspapers were identified by Donegal County Council, as suitable for advertising planning applications within the Glenties Municipal Area, within which the proposed wind park is located.
- 4.5 Following the initial lockdown in March 2020, due to the pandemic outbreak, the developers had hoped to arrange a public meeting later in the year and before the submission of the planning application. Unfortunately, the upgrading of County Donegal to Level 3 of the pandemic control mechanism in late September, because of escalating Covid 19 cases in the county, has rendered that public meeting untenable.





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- 4.6 While it had been originally proposed make a planning application for the erection of eight wind turbines consisting of four Enercon E126 and four Enercon E115 turbines, the developers later explored the possibility of the development of eight Siemens 132 turbines. However no firm decision was made in respect of the turbine type, but for assessment purposes, a turbine with a maximum blade tip height of 150m, a maximum hub height of 84m and a maximum blade diameter of 132m was adopted, which reflects the dimensions of the considered turbine types.
- 4.7 As stated above, a planning application, based upon maximum wind turbine dimensions was submitted on 16<sup>th</sup> June 2021, but subsequently withdrawn on 17<sup>th</sup> August 2021, as a result of a High Court Judicial Review, which confirmed that maxima dimensions for turbines, associated with wind farm developments, was unacceptable and that specific turbine dimensions had to be submitted.

## **5. Community Responses and Assessments**

- 5.1 The total number of visits (hits) to the dedicated website amounted to 3,576, with forty (40) submissions received, as outlined in Table 1 below.
- 5.2 Of the total number of submissions, twenty three (23) were from product offers and another was a request to provide financial help to a restore a house in Hungry. Two of the submissions sought compensation. The submissions relating to product offers and the house restoration, have been discarded and are not commented upon below.
- 5.3 Accordingly, fourteen (14) submissions were received, which related specifically to the project or to the existing Eirgrid station at Tievebrack, to where the project's grid connection will be made.
- 5.4 Three of the submissions focused on the visual impact of the ESB station at Tievebrack, which will facilitate the grid connection from the wind park. Notwithstanding the identification of the Tievebrack station for the grid connection, the planning application



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for the wind park, does not include any development within the station. As such, amendments to the ESB station, in terms of screening its visual impact, are not within the control of the developers.

- 5.5 In relation to the two submissions seeking inclusion within the individual household compensation scheme, agreed upon by the developers, it is considered that only those households within 1 kilometre of any wind turbine will be included. However it is open to those households outside the compensation boundary to seek financial help from the Community Benefit Fund, if the fund administrators agree that there is merit in any request.

**TABLE 1: SUBMISSIONS**

Type of submission	Number
Telephone calls of support for the project	2
Letters of support for the project	4
Emails of support for the project	3
Emails of objection to the project	2
Objections to Eirgrid substation	3
Seeking inclusion for compensation	2
Seeking financial support to rebuild house	1
Product offers	23
<b>TOTAL</b>	<b>40</b>

- 5.6 The two submissions objecting to the project, highlighted a range of concerns, including environmental impacts, damage to visual amenity through poles and pylons, impacts on archaeological and historical artefacts, impacts on human beings and their health and depreciation of house values.
- 5.7 Apart from the latter concern regarding house value depreciation, which is discussed below, the two concerned residents were advised that a comprehensive Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) will be carried out by professional experts, covering the various areas of concern, which they have raised.



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- 5.8 These professional reports will be assessed and scrutinised by the Planning Authority (Donegal County Council) officials and if there is an appeal against the Planning Authority's decision, by the inspectors and members of An Bord Pleanála. In the event that evidence from a professional expert, confirms that the project would be likely to have a significant adverse impacts, then the planning application would have to be amended to address such impacts.
- 5.9 There have been no empirical studies carried out in Ireland on the impacts of wind parks on property prices, although studies have been done in the UK. An assessment on the impact of wind park developments was commissioned by Renewable UK and carried out by the Centre for Economics and Business Research (Cebr) in March 2014. Its main conclusions were:
- Overall the analysis found that the county-wide property market drives local house prices, not the presence or absence of wind parks.
  - The econometric analysis established that construction of wind parks at the five sites examined across England and Wales has not had a detectable negative impact on house price growth within a 5km radius of the sites.
- 5.10 Another study issued in October 2016 'Impact of wind Turbines on House Prices in Scotland' (2016) was published by Climate Exchange. Climate Exchange is Scotland's independent centre of expertise on climate change, which exists to support the Scottish Governments policy development on climate and the transition to a low carbon economy.
- 5.11 The report presented the main findings of a research project estimating the impact on house prices from wind park developments. It was based on analysis of over 500,000 property sales in Scotland between 1990 and 2014. The study found no evidence of a consistent negative effect on house prices and did not find a consistent negative effect of wind turbines or wind parks, when averaging across the entire sample of Scottish wind turbines and their surrounding houses. Most results either showed no significant





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effect on the change in price of properties within 2km or 3km, or found the effect to be positive.

5.12 It is reasonable to conclude on the basis of the available UK studies, that the provision of a wind park at the proposed location would not impact on the property values in the area.

5.13 Finally, as the wind turbine models were the only alteration to the original wind farm proposal and as the submissions from the public, related generally to points of principle, it was considered that the public consultation procedure, outlined above, adequately addressed the new project, with the wind turbine models specifically identified, as opposed to wind turbines of maxima dimensions.

### **6. Additional infrastructure to the original project**

6.1 Eirgrid's requirement for detailed and reliable data signals to provide high quality forecasting to maintain system security, necessitated the inclusion of a permanent meteorological mast in the project. The proposed mast will be a free standing structure, 80m high and shall be sited in the location of the existing temporary stay-supported meteorological mast, which was erected to confirm the feasibility of the site before detailed work was undertaken.

6.2 It is considered that the inclusion of the permanent meteorological mast will not give rise to concerns, as it is to be located at the site of the temporary mast and will be a similar height.

### **7. Amendments to original project**

7.1 To address concerns by the avi-fauna and noise experts, it was agreed to relocate the position of turbines 1 and 2, to ensure a separation distance of 600m between them and the curtilage of the nearest dwelling. While the landowner had expressed satisfaction with the original locations, it was decided to retain the amended locations, which fully



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comply with the separation distances, recommended in the Draft Wind Energy Guidelines 2019.



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# **Appendix A:**

**Public Information Document issued to  
local residents and published on wind  
park website in May 2020**



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**PROPOSED DEVELOPMENT OF WIND ENERGY PROJECT IN THE  
TOWNLANDS OF MEENAMANRAGH, GRAFFY & DALRAGHAN MORE  
GLENTIES WITH A GRID CONNECTION FROM A PROPOSED SUBSTATION AT  
MEENAGRUBBY VIA THE TOWNLANDS OF MEENAMANARAGH, GRAFFY,  
BANGANBOY, STRACASHEL, MEENAMALARAGH TO THE TIEVEBRACK ESB  
STATION AT DRUMNALOUGH, GLENTIES.**

1. Planning permission was granted in February 2011 for the development of a wind farm consisting of 13 turbines (An Bord Pleanála Ref. No: PL 05B.237656), as shown on Map No. 1 attached.
2. The shares in Cuilfeach Teoranta, the original development company associated with the permitted wind farm, have been acquired by the directors of SMR International Wind Parks Ltd., who wish to amend the proposal, by changing the permitted turbine type and reducing the number of turbines.
3. Eight (8) turbines are now proposed in lieu of the thirteen (13) permitted turbines and are sited generally at locations previously permitted. However, the spread of the turbines in the new layout is more confined than the permitted layout, as shown on the attached Map No.2. An alternative site for the wind farm substation has also been identified at Meenagrubby.
4. It is proposed to make a planning application for four Enercon E126 and four Enercon E115 turbines, which will be in place for 25 years from the date of commissioning. The turbine locations are shown on the attached Map No 2. The four Enercon E126 turbines have a hub height of 86 metres and a blade diameter of 127 metres, giving a blade tip height of 149.5 metres. The four Enercon E115 turbines have a hub height of 92 metres and a blade diameter of 115.7 metres, giving a blade tip height of 149.85 metres. The turbines will connect underground to the proposed substation/control room and thereon to the Eirgrid station at Tievebrack and no overhead lines are proposed.
5. The proposed grid connection line will extend for circa 7kms from the substation/control room location at Meenagrubby, westwards to the Tievebrack



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Eirgrid station at Drumnalough. For the most part the grid connection will follow the local county road, before turning into and along the private road serving the Tievebrack Eirgrid station. The grid connection route is shown on Map No 3 attached.

6. The turbines will be delivered from Killybegs via the N56 to Donegal Town and then along the N15, before turning at the Roadhouse Bar at Cappry to join the R252 to Ballinamore. From Ballinamore the haul route will use local county roads to reach the project site from the east. Construction vehicles to the wind farm site will also use this route, which is considered to be the optimum route in terms of interference with the local community. Map No. 4 is attached, depicting the delivery route,.
7. As part of the planning application, the project will have a comprehensive Environmental Impact Assessment Report (EIAR), which will address all potential impacts of the project. The potential impacts assessed will include, among a range of topics, impacts on human beings, the landscape, biodiversity, geology, hydrogeology, noise, shadow flicker, archaeology and air quality.
8. Subject to the project being commissioned, a Community Benefit Fund ( CBF ) will be established that will provide compensation payments to occupied dwellings within 1 Km of any turbine and will also be used to fund local community projects.
9. This fund will be calculated, based on Government recommendations and will be administered by a committee consisting of local people. All local projects will be eligible to apply for support from this fund.
10. It had been proposed to arrange a public meeting at the Edeninfagh Hall in early April, but the escalation of the coronavirus and Government advice, restricting contacts by groups of people, has prohibited this means of engagement with the local community.
11. Members of the general public are now invited to submit their views on the project by returning their comments in writing, or by the pre-paid envelope attached to the information pack delivered to houses in the vicinity of the wind park.
12. A dedicated website has been created ([www.graffywindpark.com](http://www.graffywindpark.com)) for the project, which will also enable the general public to submit their views under the 'CONTACT



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- US' menu. This website will be maintained throughout the project, from planning through to construction and operation and eventually decommissioning.
13. Alternatively comments and submissions on the proposal may be emailed to [comments@graffywindpark.com](mailto:comments@graffywindpark.com).
  14. Renewable energy is recognised as having a vital part to play in Ireland meeting its Kyoto targets for the reduction of greenhouse gas emissions. Ireland faces significant challenges through efforts to meet its 2020 targets, the EU targets for renewable energy by 2030 and its commitment to transition to a low carbon economy by 2050. It is now clear that Ireland is falling behind meeting its 2020 target for renewable energy, as well as the longer-term movement away from fossil fuels.
  15. Wind energy is critical to helping Ireland address these challenges and is recognised as the renewable source of energy which is the fastest and most economical to put into operation. As such, it is of vital importance in the short to medium term in Ireland's national policy regarding the production of green energy.
  16. Finally, Mr. Noel McDermott and Mr Jim Harley will be the nominated contact liason persons on behalf of the developer and will be available to answer any queries during the pre-planning, planning, construction, operating and decommissioning phases of the project. Details of the telephone contact persons are +44-(0)7463541149 for Mr. Harley and 074 92 06982 for Mr McDermott. As confirmed above, the email address for comments is [comments@graffywindpark.com](mailto:comments@graffywindpark.com).
  17. I would be grateful if your comments could be returned by 30th June 2020, to enable the project team to review the proposal and to make suitable amendments. It is anticipated that the planning application will be submitted in September 2020.

Jim Harley

Harley Planning Consultants





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## **Appendix B:**

**Copy of public notice published in the Derry People/Donegal News on Tuesday 5<sup>th</sup> May 2020, the Peoples Press on Tuesday 12<sup>th</sup> May 2020 and in the Donegal Democrat on Thursday 14<sup>th</sup> May 2020**



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**PUBLIC CONSULTATION IN RESPECT OF A WIND ENERGY  
PROJECT IN THE TOWNLANDS OF MEENAMANRAGH,  
GRAFFY & DALRAGHAN MORE, GLENTIES, WITH A  
GRID CONNECTION FROM A PROPOSED SUBSTATION  
AT MEENAGRUBBY VIA THE TOWNLANDS OF  
MEENAMANARAGH, GRAFFY, BANGANBOY, STRACASHEL,  
MEENAMALARAGH TO THE TIEVEBRACK ESB STATION AT  
DRUMNALOUGH, GLENTIES**

It is proposed make a planning application for the above development, which will consist of four Enercon E126 and four Enercon E115 turbines, which will be in place for 25 years from the date of commissioning. Details of the proposal are set out on the dedicated website [www.graffywindpark.com](http://www.graffywindpark.com)

It had been proposed to arrange a public meeting in early April, but the escalation of the coronavirus and Government advice, restricting contacts by groups of people, has prohibited this means of engagement with the local community.

Comments and submissions on the proposal are welcomed in writing, which can be sent to Harley Planning Consultants, C/O SMR Wind Parks Ltd., 1st Floor, McKindrick Place, Pearse Road, Lettekenny, Co Donegal F92 WY22. Alternatively comments and submissions on the proposal may be uploaded to the website [www.graffywindpark.com](http://www.graffywindpark.com) or returned to [comments@graffywindpark.com](mailto:comments@graffywindpark.com)

It would be appreciated if comments/submissions could be returned by 30th June 2020, to enable the project team to review the proposal and to make suitable amendments, if considered necessary.