

An Bord Pleanála,
64 Marlborough Street
Rotunda,
Dublin 1
D01 V902

Our Ref: P2114/Lett/JH/JO

28 January 2022

Re: Planning Application for a Wind Farm Development (and all associated works) within the townlands of Annagannihy, Aughinida, Ballynagree East, Ballynagree West, Bawnmore, Caherbaroul, Carrigagulla, Carrigduff, Clonavrick, Derryroe, Drishane More, Dromagh, Drominahilla, Dromskehy, Finnanfield, Inchamay South, Kilberrihert, Knocknagappul, Rahalisk and Tullig, Co. Cork.

Dear Sir/Madam,

1.0 Introduction

On behalf of our client, Ballinagree Wind DAC, please find enclosed an application for planning consent for the proposed construction of a wind energy development (and all associated infrastructure) within the townlands of Annagannihy, Aughinida, Ballynagree East, Ballynagree West, Bawnmore, Caherbaroul, Carrigagulla, Carrigduff, Clonavrick, Derryroe, Drishane More, Dromagh, Drominahilla, Dromskehy, Finnanfield, Inchamay South, Kilberrihert, Knocknagappul, Rahalisk and Tullig, Co. Cork.

This application is being made directly to An Bord Pleanála as ‘Strategic Infrastructure Development’ (SID) under the provisions of Section 37E of the Planning and Development Act 2000 as amended.

This position was confirmed by An Bord Pleanála to the applicant on the 19th August 2021 following pre-application consultations with the Board (Case Number PC04.306948), a copy of the noted correspondence is enclosed with this letter for completeness.

As the project requires an Environmental Impact Assessment Report (EIAR) the application documentation includes a copy of the EIAR Portal Notice. The correspondence issued confirms the EIA portal ID number for the project (2022005) and that the details have been uploaded onto the Department’s portal.

2.0 Documents Enclosed

Please find 2 hard copies and 8 electronic copies of the planning application pack enclosed with this letter. Cork County Council have received 5 hard copies and 5 electronic copies also. Correspondence from An Bord Pleanála confirming the number of copies for submission is attached to this letter. All prescribed bodies as identified are being provided with application documentation in the format which they have requested.

The following documents are included in the application pack:

- **Planning Application Documentation**
 - Planning Application Form
 - Site Notice, Erected 27 January 2022
 - Newspaper Notices in Irish Examiner and The Corkman dated 27 January 2022
 - Schedule of Drawings
 - Letters of Consent from Relevant Landowners
 - Letter from Ballinagree Wind DAC confirming that works proposed on the public road will be undertaken by a statutory undertaker
 - Schedule of Consultation
 - List of Prescribed Bodies and Copy of Notification Letter Sent to Prescribed Bodies
 - EIA Portal Confirmation (2022005)
 - SID Planning Application Fee of €100,000.00 (Paid by EFT)

- **Planning Application Drawings (See schedule attached to application form)**

- **Environmental Impact Assessment Report (EIA)**
 - Volume 1- Non-Technical Summary (NTS)
 - Volume 2- EIA
 - Volume 3- EIA Appendices
 - Volume 4- Photomontages

- **Appropriate Assessment Screening & Natura Impact Statement (NIS)**

3.0 Plans & Particulars

The plans and particulars submitted with this application for consent are precise and provide specific dimensions for the turbine structures which incorporates a small range in dimensions. The turbine specifications will have a blade tip height range from 179m to 185m, a hub height range from 102.5 m to 110.5m and a rotor diameter range from 149m to 155m as illustrated in the plans and particulars submitted with this application for consent.

Each chapter of this EIA has fully assessed all combinations within this range in turbine specification and the ultimate final turbine selection will fall within the parameters of this range.

The exact make and model of the turbine will be dictated by a competitive tender process, but it will be within the range shown on the plans and particulars and as described and assessed in this EIA.

While the above-mentioned limited range of turbine dimensions is being applied for, if the Board is of a mind to permit the development based on fixed dimensions only for the turbines, we request that the following three fixed dimensions for turbines are consented:

- Tip height of 185m, hub height of 107.5m, rotor diameter of 155m
- Tip height of 185m, hub height of 110.5m, rotor diameter of 149m
- Tip height of 180m, hub height of 102.5m, rotor diameter of 155m

Each of these 3 no. fixed dimensions within the proposed range have been fully assessed as part of the assessment of the full range proposed as part of the EIA and AA process.

4.0 Zoning

The site is located within the jurisdiction of Cork County Council and is designated as being 'Open to Consideration' for wind energy development pursuant to the Cork County Development Plan 2014. Cork County Council propose to uphold this designation in the Draft Cork County Development Plan 2022.

Policy Objective ED 3-5: **Open to Consideration**, states;

"Commercial wind energy development is open to consideration in these areas where proposals can avoid adverse impacts on:

- *Residential amenity particularly in respect of noise, shadow flicker and visual impact;*
- *Urban areas and Metropolitan/Town Green Belts;*
- *Natura 2000 Sites (SPA and SAC), Natural Heritage Areas (NHA's) or adjoining areas affecting their integrity.*
- *Architectural and archaeological heritage;*
- *Visual quality of the landscape and the degree to which impacts are highly visible over wider areas."*

The Environmental Impact Assessment Report and the Appropriate Assessment Screening and Natura Impact Statement submitted with this application for consent clearly set out that the proposed development will not have an adverse impact on residential amenity and or any urban area given the site's location and set back from receptors.

The Archaeology, Architectural and Cultural Heritage assessment contained in the EIAR concludes that the proposed development will not result in any direct negative impacts to any known archaeological monuments or designated architectural heritage structures.

The Landscape and Visual Impact Assessment contained in the EIAR states that the significance of landscape impact is considered to be Moderate throughout the Central Study Area and beyond 5km from the site the landscape impact significance is not considered to exceed Slight. The assessment also concludes that overall, it is not considered that the proposed project will result in significant visual impacts.

The site is not located within a Natura 2000 site and in light of the conclusions of the Natura Impact Statement, the competent authority is enabled to ascertain that the proposed project will not adversely affect the integrity of any European site.

Therefore, it is submitted that the proposed development fully accords with the site's designation and the principle of development should be supported by Cork County Council and An Bord Pleanála.

5.0 BEMP Lands

The developer at an early stage of the project sought to provide a planning and environmental gain to the area proximate to the wind farm site. One such planning gain was the introduction of a recreation and amenity trail as part of the project, (this is discussed in Section 6 below), the environmental gain sought was the introduction of a Biodiversity Enhancement Management Plan for lands within the ownership of landowners in the area who were willing to participate in the scheme. The Biodiversity Enhancement Management Plan is contained in Appendix 3.4 of the EIAR.

Four private landowners with a combined total of c. 304 ha of lands in the vicinity of the wind farm, but beyond 250m of any proposed turbine, have agreed to a long-term commitment to detailed land management measures designed to maintain and enhance local biodiversity. In addition, the Developer has committed to create wildlife corridors via strategic tree-felling which will create and connect areas of open upland habitat in the vicinity of the proposed wind farm area. These lands are located primarily outside the redline boundary of the main wind farm site. The Biodiversity Enhancement Management Plan lands are in the townlands of Carrigduff, Annagannihy, Knocknagappul, Rahalisk, Oughtihery, Dooneens, Carriganish, Kilberrihert and Caherbaroul, Co. Cork.

For completeness this EIAR has included these lands within its 'project' description and therefore assesses the lands as part of the project throughout the EIAR and NIS.

6.0 Recreational Offering

The proposed development will include approximately 15km of upgraded or new access tracks which will be developed as walking trail routes throughout the wind farm site. This will include links to the existing sections of the Duhallow Way as well as providing users with a new section of trail to a viewing platform from the Duhallow Way. Furthermore, it is proposed to connect these trails to existing archaeological features throughout the site and supply archaeological and biodiversity heritage information boards, trail waymarks, trail viewing points as well as a trailhead carpark and picnic area. In this regard it is proposed to partially reinstate the southern construction compound for use as a trail head car park with up to 40 no. parking spaces for visitors.

This enhancement of the walking and hiking infrastructure and the connection to heritage features throughout the site will have a positive impact on the area and will seek to enhance the current Duhallow Way offering. Furthermore these amenities will be a permanent feature of the site going forward ever after the decommissioning of the wind farm.

7.0 Community Benefit

The Developer aims to develop long-life assets in such a way to ensure long-term benefits to the local community and economy are created and sustained. The applicant expects that for each megawatt hour (MWh) of electricity produced by the wind farm, the project will contribute €2 into a community benefit fund for the RESS period i.e. the first 15 years of operation.

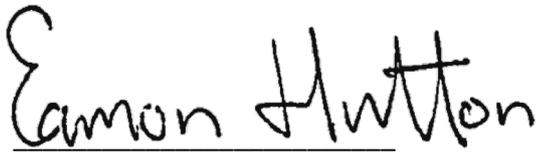
In addition to the RESS commitment the developer proposes voluntarily to continue this payment for the remaining lifetime of the wind farm at a rate of €1 per MWh, which represents a continued and significant socio-economic gain to the local area.

Assuming that the export capacity of the proposed development will be between 118MW and 132 MW and is contracted under the RESS, it is anticipated that the community benefit fund for the proposed Ballinagree Wind Farm has potential to deliver over €600,000 per year to the local community for the first 15 years of operations following the commissioning of the project, and over €300,000 per year for the remaining lifetime of the project.

9.0 Conclusion

I trust that you have all the information you require to progress the application. If, however, you have any queries or require to discuss any matter in detail, please do not hesitate to contact the undersigned.

Yours sincerely,



Eamon Hutton
for and on behalf of **Fehily Timoney and Company**