



Innealtóireacht agus Mórthionscadail,
Aon Lárcheantar Aerfort Bhaile Átha Cliath,
Clochrán, Co. Bhaile Átha Cliath, K67 XF72, Éire
Fón +353 1 703 8000

Engineering and Major Projects,
One Dublin Airport Central, Dublin Airport,
Cloghran, Co. Dublin, K67 XF72, Ireland
Phone +353 1 703 8000

**Wexford County Council,
Planning Department,
County Hall,
Carricklawn,
Wexford,
Y35 WY93.**

23rd July 2021

Re: Submission of a planning application for continuation of the operational life of the existing Carnsore Windfarm from the date of expiration (August 2022) of the current An Bord Pleanála (ABP) permission (WCC Reg. Ref. 98/301 & ABP Ref. PL26.116487).

Dear Sir/Madam,

1. Introduction

On behalf of Hibernian Wind Power Limited (HWPL) please find enclosed a planning application seeking planning permission for the continuation for fifteen (15) years of the operational life of the existing Carnsore Windfarm from the date of expiration (August 2022) of the current An Bord Pleanála (ABP) permission (WCC Reg. Ref. 98/301 & ABP Ref. PL26.116487). HWPL is a wholly owned subsidiary of the Electricity Supply Board (ESB).

2. The Application Site

The site is located approximately 8 kilometres (km) south of Rosslare Harbour and approximately 15km east of Kilmore Quay in Co. Wexford. The approximate grid reference location for the centre of the site is E711919, N604394. The area of the site covers approximately 77.4 hectares (ha), in total in the seven townlands of Bunarge, Burrow, Bush, Nethertown, Shilmore, St. Vogue's and Summerstown, County Wexford – see **Figure 1**.

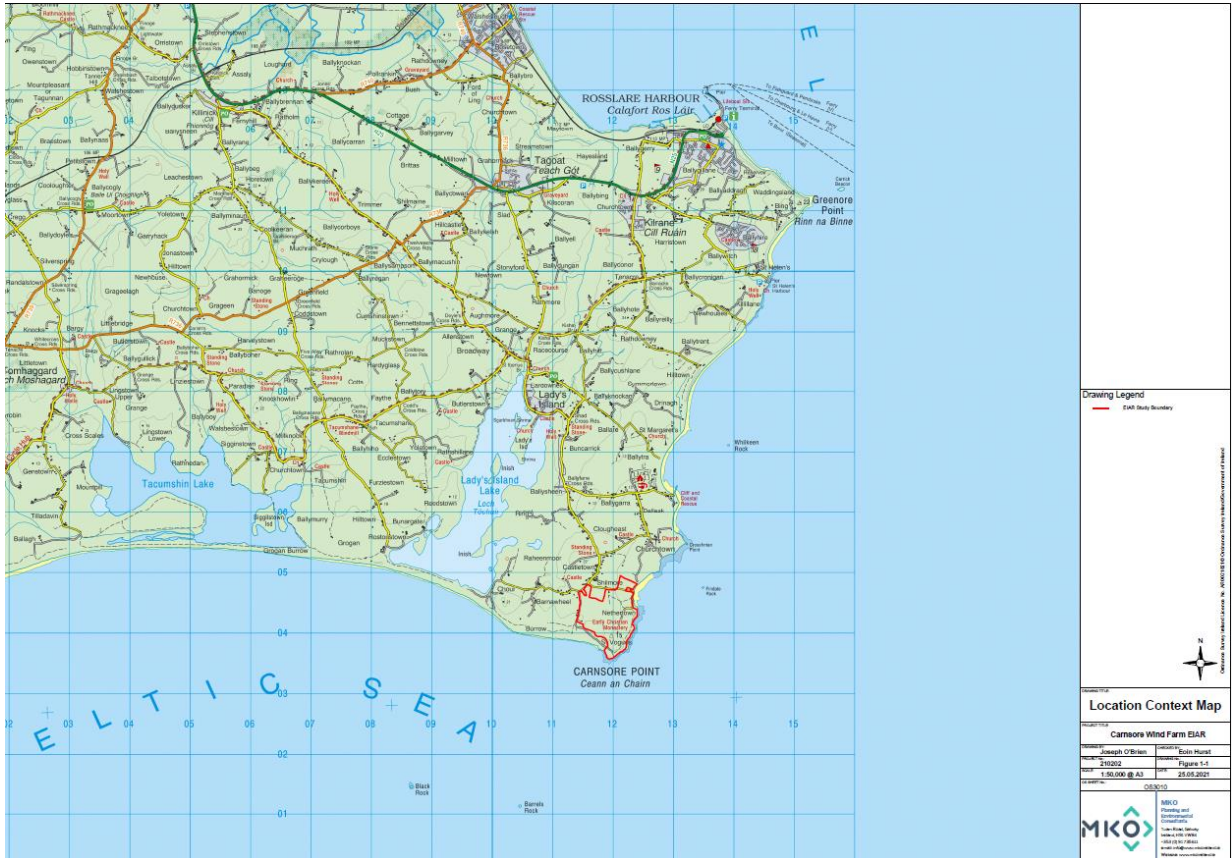


Figure 1 Site Location

3. The Development

The development shown on the site layout (**Figure 2**) and described in the public notices is as follows:

This application seeks a fifteen (15) year planning permission for continuation of the operational life of the existing wind farm from the date of expiration (August 2022) of the current An Bord Pleanála (ABP) permission (WCC Reg. Ref. 98/301 & ABP Ref. PL26.116487).

No significant modifications are proposed to the existing windfarm which comprises the following elements:

- a) 14 no. Vestas 850 kilowatt (kW) wind turbines with an overall blade tip height of 75 metres (m) and associated hardstands;



- b) 1 no. 38 kilovolt (kV) electrical substation compound c. 575 square metres (sq.m.), which includes a control building (c. 62 sq.m., height 4.25 m), associated electrical plant and equipment, security fencing, associated underground cabling and a septic tank;*
- c) 1 no. meteorological mast with a height of 50 m. situated within a c. 153 sq.m. fenced compound which also contains a c.18 sq.m. site cabin and a 10 m high air monitoring mast;*
- d) All associated underground electrical and communications cabling connecting the turbines to the substation;*
- e) Entrance from Nethertown Lane (local public road), site tracks of c. 4 kilometres, site car parking, site drainage, and all ancillary site fencing and signage.*

An Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS) has been prepared and will be submitted to the planning authority with the application.

No construction activities or alterations to the existing wind farm are proposed beyond routine maintenance of the turbines and electrical infrastructure during the operational phase of the development.

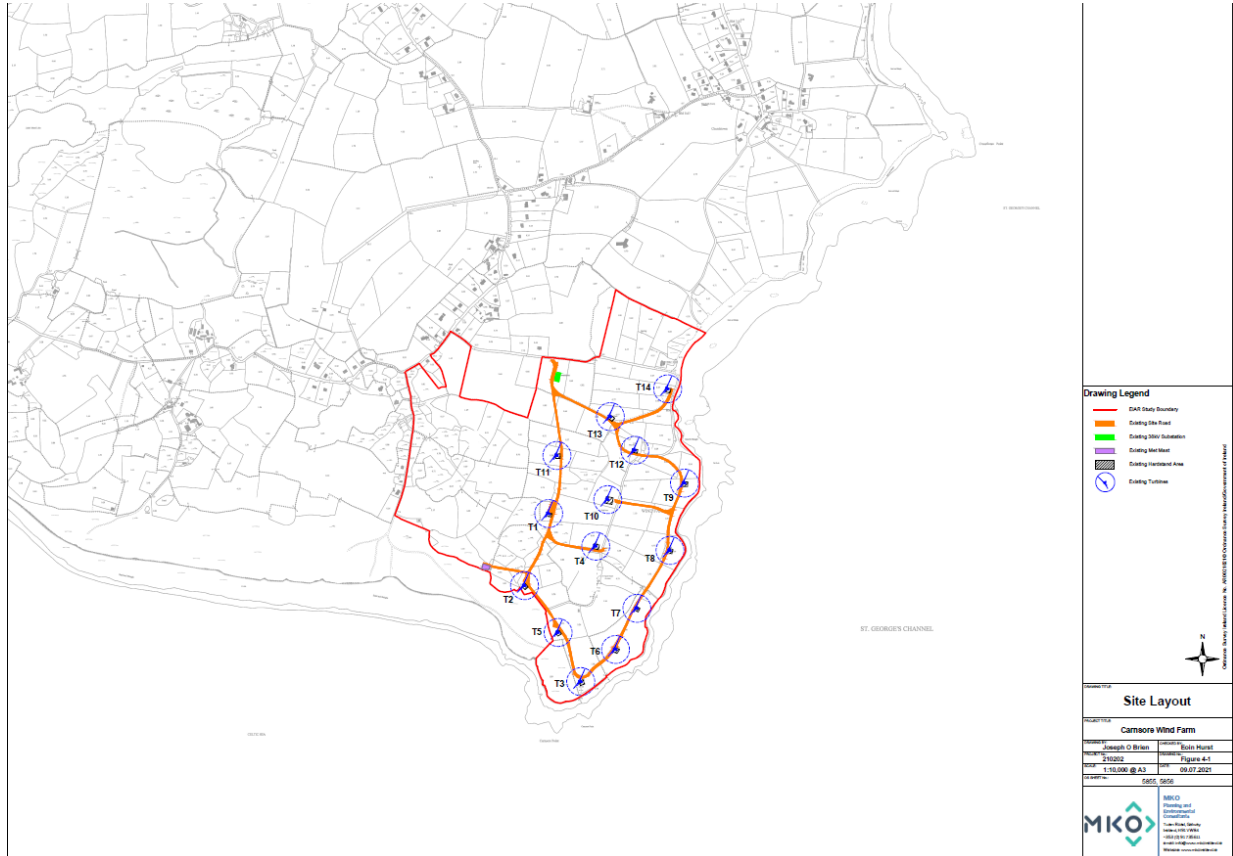


Figure 2 Site Layout

4. Planning History

Planning permission was granted for Carnsore Windfarm under Wexford County Council (WCC) Reg. Ref. 98/0301 / ABP Reg. Ref. PL26.116487. The windfarm which consists of 14 turbines became operational in 2002.

It is connected to the National Grid by a medium voltage 38 kilovolt (kV) underground cable of approximately 1.2km, and a 38kV overhead transmission line of approximately 11.2km, running from the on-site substation, in a general north and northwest direction from the wind farm to the Killinick 38kV substation, located at the junction of the R740 and N25, approximately 9.4km northwest of the wind farm (straight-line distance). This was granted planning permission under WCC Reg. Ref. 2000/3914 / ABP Reg. Ref. PL26.124600).



In February 2017, planning permission was granted for the erection of a formal compound and air quality monitoring equipment for the Environmental Protection Agency (EPA under WCC Reg. Ref. 2016/1337.

5. Basis for the Current Application

This planning application is being made arising from Condition 1 of WCC Reg. Ref. 98/0301 which states as follows:

Condition 1 - This permission shall be for a period of twenty years from the date of commissioning of the wind farm.

The windfarm was commissioned in August 2002 therefore the planning permission expires in August 2022.

For clarity, there is no similar condition in relation to the grid connection WCC Reg. Ref. 2000/3914. The most relevant condition is condition 3 which states as follows:

Condition 3 – (1) On the decommissioning of the windfarm to which this development is linked, the overhead portion of this transmission line together with the steel masts and poles shall be dismantled and removed from the site. The site shall be reinstated and all decommissioned structures removed within three months of decommissioning.

As condition 3 only requires removal of the grid connection if the windfarm is decommissioned, it is not necessary to apply for planning permission. In the event planning permission is granted by WCC for an continuation of the operational life of the existing Carnsore Windfarm, the grid connection will remain in operation for the life of the windfarm.

However, in order to comply with planning legislation in relation to Environmental Impact Assessment (EIA) the grid connection is assessed as a cumulative project within the Environmental Impact Assessment Report (EIAR).

6. Pre-Planning Consultations

Pre-planning meetings took place between officials from WCC and the HWPL Project Team in July 2020 and June 2021. At those meetings WCC indicated that in principle, an extended lifetime of the windfarm in its current form would be acceptable to the planning authority but the application would have to be accompanied by an EIAR and a Natura Impact Statement (NIS)

and would be assessed in accordance with the requirements of the Wexford County Development plan and prevailing planning legislation.

7. Reasons and Justification for the Proposed Development

7.1 Policy Context

There are a range of policies in place within the current and draft county plans which strongly support the development of new and increased penetration of renewable energy onto the national grid. Chapter 6: Biodiversity, and Chapter 13: Landscape sections of the EIAR demonstrate that the development will not give rise to significant adverse impacts on natural heritage, landscape or visual amenity. Chapter 11: Noise, and Chapter 5: Population and Human Health Shadow flicker assessments also show that the development will not give rise to significant adverse impacts on residential amenity. Accordingly, the development is consistent with the aims and objectives of the Wexford County Development Plan 2013-2019 as well as the Draft Plan provisions.

As per both the current and draft Wexford County Development Plan the subject site is located within an area which has been designated as 'not normally permissible', while this is the case, there are a number of circumstances where the planning authority will assess an application on a case-by-case basis including in instances of re-powering and extension of existing/permitted wind farms. As noted, the application is seeking to extend the life of the existing windfarm for an additional 15 years. In this regard, the development is seeking to prolong the operating period of generating renewable energy from a permitted wind farm development which essentially pre-dates the current development plan provisions.

In summary, the Wexford County Development Plan fully recognises the importance of combating climate change and deriving more energy from renewable sources. Additionally, the Planning Authority acknowledge the role which renewable energy, and (specifically in the context of the Proposed Development) wind energy, has to play in Ireland meeting its energy and climate targets.

The current use is well established and the existing windfarm has been operational for almost 20 years and the current proposal is to extend the operational period of this renewable energy

development without need for any significant additional works. The development will allow for the existing turbines to be maintained and continue to operate on-site, and therefore continue to contribute to achieving national targets. The principle for wind energy development at this site is already well established and has been proven to be in accordance with the proper planning and sustainable development of the area. In this regard, we wish to note the following favourable considerations with respect to the Proposed Development:

- **Landscape Considerations**

The site is already the site of an existing windfarm development, the current application as such will not be introducing a new feature on the landscape. As is noted within Chapter 13 of this EIAR *“the Proposed Development and associated infrastructure was well designed and reads coherently within its landscape setting in terms of its layout, spatial extent and scale”*. Additionally, it should be noted that some visual impacts do arise in locations where there is little screening however the siting, design and scale of the turbines is considered appropriate, as the turbines are only visible locally and they do not obscure views or vistas of the coast or sea. The landscape assessment carried out as part of the EIAR concludes that the *“Proposed Development and its continued operation will not have significant landscape or visual effects”*.

- **Proximity to Dwellings**

With respect to proximity to dwellings there are no residential dwellings located within 300 metres (4 times tip height) from the nearest proposed turbine location. In this instance the nearest property to any of the turbines is 314m which is outside of the 4 times tip height range.

- **Ecological Designations**

- **NIS Conclusions**

A Natura Impact Statement (NIS) has been prepared to accompany the planning application. In assessing the development, it was the conclusion of the NIS that:

‘The NIS concludes that there would be no adverse effects on the integrity of the European sites assessed in the Appropriate Assessment as a result of the continued operation of the wind farm. It is considered that the continued operation of the wind farm would not be significantly detrimental to the fulfilment of the conservation objectives for the Lady’s Island Lake SPA, Wexford Harbour and Slobs SPA, The Raven SPA and Saltees Island SPA, nor would it affect the ability of the populations of SPA species of these European sites to survive at their current conservation status.’

- **Grid Connection**

The windfarm is a currently operation wind farm development which has been operating since 2002. It is a current supplier to the national grid and as such grid connection or proximity to grid connection is not an issue. The 38kV grid has been operational for almost 20 years and is an established feature on the landscape.

- **Wind Speed**

The windfarm is a currently operational windfarm which has been operating successfully since 2002 so wind speeds in this context are not an issue. Based on a review of the Wexford Wind Energy Strategy 2013-2019 (Map No.2) the subject site is located within an area which benefits from some of the highest wind speeds within the County.

8. Consideration of EIA and AA

The planning application is accompanied by an EIAR (prepared by MKO consultants) and an AA/NIS prepared by RSK. These documents have been prepared in accordance with best practice guidelines and in accordance with all relevant legislation.

9. Application Documents

This application comprises all standard statutory documents as follows:

- Planning application form (including WCC planning checklist, letter of consent from the landowner (ESB) and minutes of pre-planning meeting with WCC) x 10 copies
- The appropriate fee of €8,188 calculated as follows:
Class 4 – €288 [Buildings - Substation and Met Mast Cabin – total area 80m² x €3.60 per m²].
Class 13 - €7,900 [€80.00, or €10.00 for each 0.1 hectare of site area, whichever is the greater] as agreed with WCC by email on 21st May 2021. The application will consist of 14 turbines and all associated roads and infrastructure on the overall site outlined in red in the planning application. Total site size – 79 hectares x €100 per ha.
- Newspaper notice published in the Wexford People on 20th July 2021 x 10 copies
- Site notices x 4 locations (as shown erected in photos) at all accesses to the site on 23rd July 2021 x 10 copies
- Confirmation from the EIA portal dated 20th July 2021 x 10 copies
- Plans and particulars as per the drawing pack x 10 copies
- An EIAR x 10 copies
- A NIS x 10 copies



10. Conclusion

I trust that all these application details are in order. Please contact me at Brendan.allen@esb.ie or 0868336990 for any queries.

Yours sincerely,

A handwritten signature in blue ink that reads "Brendan Allen".

Brendan Allen FIPI
Planning Team Leader

