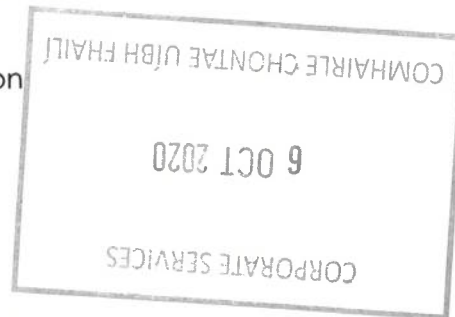




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Forward Planning Section
Offaly County Council
Áras an Chontae
Charleville Road
Tullamore
Co. Offaly



2 October 2020

To whom it may concern,

Re: Draft Offaly County Development Plan 2021-2027

Executive Summary

On behalf of our client, Galetech Energy Developments Limited, we wish to make the following submission to the Draft Offaly County Development Plan 2021-2027 ('the Draft Plan').

Our Client requests that lands currently under investigation for their ability to accommodate a wind energy development, illustrated at **Annex 1**, located c. 4km north of Birr and c. 4km south-west of Fivemiletown are designated as an 'Area Open for Consideration for Wind Energy Development' for the following reasons:-

- 1) The subject lands are assessed to have a wind speed in excess of 7.5m/s and are located within close proximity to multiple possible points of connection to the national electricity grid;
- 2) The subject lands are located in an area of low and medium landscape sensitivity;
- 3) The subject lands are not designated for nature conservation, are not assessed to be of high amenity value and the development of the lands would not significantly interfere with any scenic view, prospect or amenity route;
- 4) The absence of any overwhelming environmental constraints; and
- 5) A high degree of compliance with the Draft Revised Wind Energy Development Guidelines 2019 particularly in terms of available separation distances to dwellings, noise and shadow flicker limits and grid connection availability.

Our Client also wishes to express concern regarding the content of Policy CAEP-35(c) which proposes a 2 kilometre (km) separation distance between wind turbines and the settlement boundaries of towns and villages. The Planning Authority has offered no rationale or justification for the selection of this arbitrary figure or for the inclusion of this policy. This policy provision would preclude the delivery wind energy developments on otherwise entirely suitable lands which adhere to each of the key selection criteria set out in the Draft WES.

Introduction

Our Client is currently investigating the suitability of a parcel of land c. 4km north of

Birr and c. 4km south-west of Fivealley, the general extent of which are illustrated at **Annex 1**¹, to accommodate a wind energy development. As part of this process, our Client is undertaking an extensive environmental scoping exercise while also evaluating the subject lands ability to comply with the policy provisions of the current *Wind Energy Strategy for County Offaly 2014* (Offaly County Council, 2014) ('the current WES') and the *Draft County Wind Energy Strategy* ('the Draft WES'); and ensuring compliance with the *Wind Energy Development Guidelines for Planning Authorities 2006* (Department of Environment, Heritage and Local Government, 2006) ('the 2006 Guidelines') and the *Draft Revised Wind Energy Development Guidelines 2019* (Department of Housing, Planning and Local Government, 2019) ('the 2019 Draft Guidelines').

Based on our Client's assessment, the subject lands are evidently suitable for the development of a wind energy project, as set out below; however, our Client is disappointed that the Planning Authority has failed to uniformly apply the determining criteria of the Draft WES to all lands within the County including the subject lands. Therefore, our Client respectfully submits that the subject lands, as illustrated at **Annex 1**, be designated as an 'Area Open for Consideration for Wind Energy Development'.

Suitable Wind Energy Development Area Identification Process

The Draft WES, at Section 5, sets out a stepwise "sieve mapping analysis" in order to identify the most suitable locations for wind energy development. The Draft WES utilises 3 no. steps and assesses the county in terms of:-

- 1) Existing Wind Speeds and accessibility to electricity transmission and distribution grids;
- 2) Evaluation of the landscape and its sensitivity to wind energy developments; and
- 3) Evaluation of land having regard to the built and natural environment, archaeological and amenity designations and existing settlements within the county.

Each of these steps are addressed in turn below.

Existing Wind Speeds and accessibility to electricity transmission and distribution grids

Map No. 2 of the Draft WES illustrates areas which are assessed to have a wind speed of greater than 7.5 metres per second (m/s) at 100m above ground level, according to the Sustainable Energy Authority of Ireland (SEAI) Wind Atlas 2013 (SEAI, 2013). The lands being investigated by our Client, and indeed the vast majority of County Offaly, fall within this category and are therefore suitable and viable for wind energy development.

¹ Given the requirements of the Draft Revised Wind energy Development Guidelines, the separation distances to dwellings forms a key component of the selection of lands available for wind energy development.

One of the significant advantages of the subject lands is its strategic location with regards the multiple options for connecting to the national electricity grid. Most notably is the location of the Dallow (Clondallow) 38kV substation located approximately 2km to the south-west. In addition to the Dallow 38kV substation, there are a number of other potential electricity substations conveniently located within 12km of the subject lands which could also be reasonably selected to facilitate connection of the proposed development to the national grid including:-

- Birr 38kV substation located c. 5km to the south;
- Banagher 38kV substation located c. 10km to the north-west
- Lumcloon 38kV substation located c. 10km to the north-east; and
- Derrycarney 110kV substation located c. 11km to the north-east.

Therefore, given the close proximity of the subject lands to a multitude of grid connection options, the subject lands have demonstrated their ability to accommodate a wind energy development which, in combination with the substantial wind resource at the subject site, clearly demonstrates that they adhere fully to the requirements of Step 1 and are suitable for a wind energy development.

Evaluation of the landscape and its sensitivity to wind energy developments

The second step in the Draft WES's evaluation of suitable wind energy development locations is to assess the sensitivity of the landscape to wind energy developments. Map No. 3 of the Draft WES illustrates divides the county into areas of high, medium and low landscape sensitivity having regard to their overall sensitivity to different types of development. Section 5.2.1 of the Draft WES states that "...*'High Landscape Sensitivity Areas' have not been included in 'Areas Open for Consideration for Wind Energy Developments' in Map 10: Wind Energy Designations.*" It is reasonable to conclude, therefore, that areas of medium and low sensitivity are likely to be suitable for such developments subject to compliance with all other determining criteria.

The subject lands, and all lands surrounding the site, are assessed to be of low or medium sensitivity. It is noted that lands immediately north of Birr, associated with the Woodville Woods pNHA (proposed Natural Heritage Area) have been identified as an area of high landscape sensitivity. However, despite the relative proximity of the subject lands to the pNHA, the Planning Authority has classified the subject lands as being of low sensitivity and are, therefore, a wholly appropriate location for the development of a wind energy project.

The appropriateness of the subject lands is reinforced by Table 4.19 of the Draft Plan where it is stated, with regards to low landscape sensitivity areas, that *"These areas in general can absorb quite effectively appropriately designed and located development in all categories (including: telecommunication masts and wind energy installations...."*; while Table 4.20, in relation to medium/moderate sensitivity areas, states that certain types of development, including wind farms, may be suitable subject to appropriateness and the imposition of conditions.

Evidently, by the Planning Authority's very own standards, the subject lands are an appropriate location for a wind energy development and should, therefore, be designated as an area open for consideration for wind energy developments.

Evaluation of land having regard to the built and natural environment, archaeological and amenity designations and existing settlements within the county

The final step of the Draft WES's evaluation of potentially suitable sites for wind energy development predominately involves an evaluation of lands having regard to the natural environment and amenity designations. Map Nos. 4, 5 and 6 illustrate the locations of European and National Designated Sites, Areas of High Amenity and Protected Views respectively. Having reviewed each of the relevant maps:-

- 1) The subject lands or their immediate environs are not designated for nature conservation, either at European or national level;
- 2) The subject lands, nor their immediate environs, are assessed to be of high amenity value; and
- 3) A wind energy development on the subject lands would not significantly interact with any scenic view, prospect or amenity route.

Our Client therefore submits that, on the basis of the criteria presented in the Draft WES, there are no overwhelming environmental constraints associated with the subject lands which would preclude a wind energy development at this location.

Field Analysis and Desktop Survey

The Draft WES proceeds to identify 12 no. potential wind energy areas (see Map No. 7) purportedly on the basis of the evaluation carried out at Section 5 of the Draft WES. However, having regard to the "sieve mapping analysis" previously undertaken, it is difficult to understand why the lands under investigation by our Client have been omitted from further evaluation in light of the obvious suitability of these lands. Put simply, there is no reason whatsoever for the omission of the subject lands from this field analysis and desktop survey.

Moreover, many of the potential wind energy areas identified at Map No. 7 are substantially more constrained than the subject lands; which clearly undermines the Draft WES and demonstrates that the environmental sensitivity analysis undertaken is not underpinned by evidence. It is abundantly clear that, had the Planning Authority correctly implemented its very own environmental evaluation process, the subject lands would have adhered to and demonstrated compliance with each, and every, determining criteria and would have clearly demonstrated its suitability to accommodate a wind energy development.

It is noted that the 'Birr Environs' are assessed as part of 'Wind Energy Potential Area 7', however, have been excluded given the presence of the Little Brosna Callows and Dovegrove Callows and the presence of I-LOFAR (Irish Low Frequency Radar) at Birr Castle which may be affected by wind turbines. However, the subject lands are located c. 2km from Dovegrove Callows and c. 5km from the River Little Brosna

Callows thus substantially reducing the effect of any future development of the subject lands.

With regards the possibility of effects on the I-LOFAR, it should first be noted that the subject lands are located in excess of 5km from the I-LOFAR location thus substantially reducing the likelihood of effects. The Planning Authority has not presented evidence of consultation with the relevant bodies to fully determine whether a wind energy development in this general location would result in effects on the I-LOFAR. As a result, our Client submits that the decision not to designate lands in the vicinity of Birr, including the subject lands, for this reason is premature in the absence of such consultation. Therefore, our Client submits that the area should be designated as 'Open for Consideration for Wind Energy Development' pending consultation by our Client, or indeed any other possible applicant, with the appropriate authorities and/or aviation bodies to fully evaluate the likelihood of significant effects on the I-LOFAR.

Draft Revised Wind Energy Development Guidelines 2019

The 2019 Draft Guidelines were published in December 2019 and provide an update of the 2006 Guidelines. The 2019 Draft Guidelines provide updates to a number of key aspects associated with the development and delivery of wind energy developments including, *inter alia*, more restrictive noise limits, the implementation of specified visual amenity setback requirements and the elimination of shadow flicker. The subject lands, and any development proposed on the lands, would therefore be required to adhere to the requirements set out in the 2019 Guidelines, or any future revisions, following their adoption.

The subject lands are evaluated as being suitable for the provision of a wind energy development which would be capable of complying with all aspects of the 2019 Draft Guidelines. In particular, it is noted that there are areas within the subject lands which provide substantial separation distances to existing dwellings (i.e. a minimum of 600m to the nearest dwelling as illustrated at **Annex 1**) which, in addition to adhering to the requisite setback requirements, would enable a development to comply with stringent noise limits while the installation of technological measures would ensure the elimination of shadow flicker at residential dwellings.

In addition to the recommended re-evaluation of the subject lands, our Client submits that a full re-examination of the entire county should be commenced by the Planning Authority, having regard to the specific criteria set out in the Draft 2019 Guidelines, to ensure that all suitable lands are identified and designated, where appropriate, as being 'Open for Consideration for Wind Energy Development'. This re-examination is crucial where, as in the case of the subject lands, areas which exhibit a high degree of compliance with national policy have been excluded from the Draft WES without any clear rationale or justification.

Conclusion

The recently published Programme for Government commits to an average 7% per



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annum reduction in overall greenhouse gas emissions from 2021 to 2030 (a 51% reduction over the decade) and to achieving net zero emissions by 2050. This is one of the most ambitious decarbonisation pathways anywhere in the world. The Programme for Government also recommit to the 70% renewable energy target by 2030 and to putting this target on a statutory footing. According to the latest EPA projections, a 70% contribution of renewable energy in electricity generation by 2030 will require an approximate tripling of the 2018 renewable generation capacity, while rapidly phasing out coal and peat use. The delivery of small-scale developments can play a key role in reaching these electricity generation targets while very significantly ameliorating any perceived environmental and amenity criticisms that larger schemes can typically attract.

Having regard to the above, our Client submits that the Planning Authority has not offered any reasoned explanation or evidence for the exclusion of the subject lands, as illustrated at **Annex 1**, from the designated 'Areas Open for Consideration for Wind Energy Development'. The exclusion of the subject lands is inappropriate and unwarranted having regard to their suitability to accommodate such development and the pressing urgency of delivering on binding national renewable energy targets. Therefore, our Client respectfully requests that the subject lands be included as an 'Area Open for Consideration for Wind Energy Development'.

Kind Regards,

Galetech Energy Services

Galetech Energy Services



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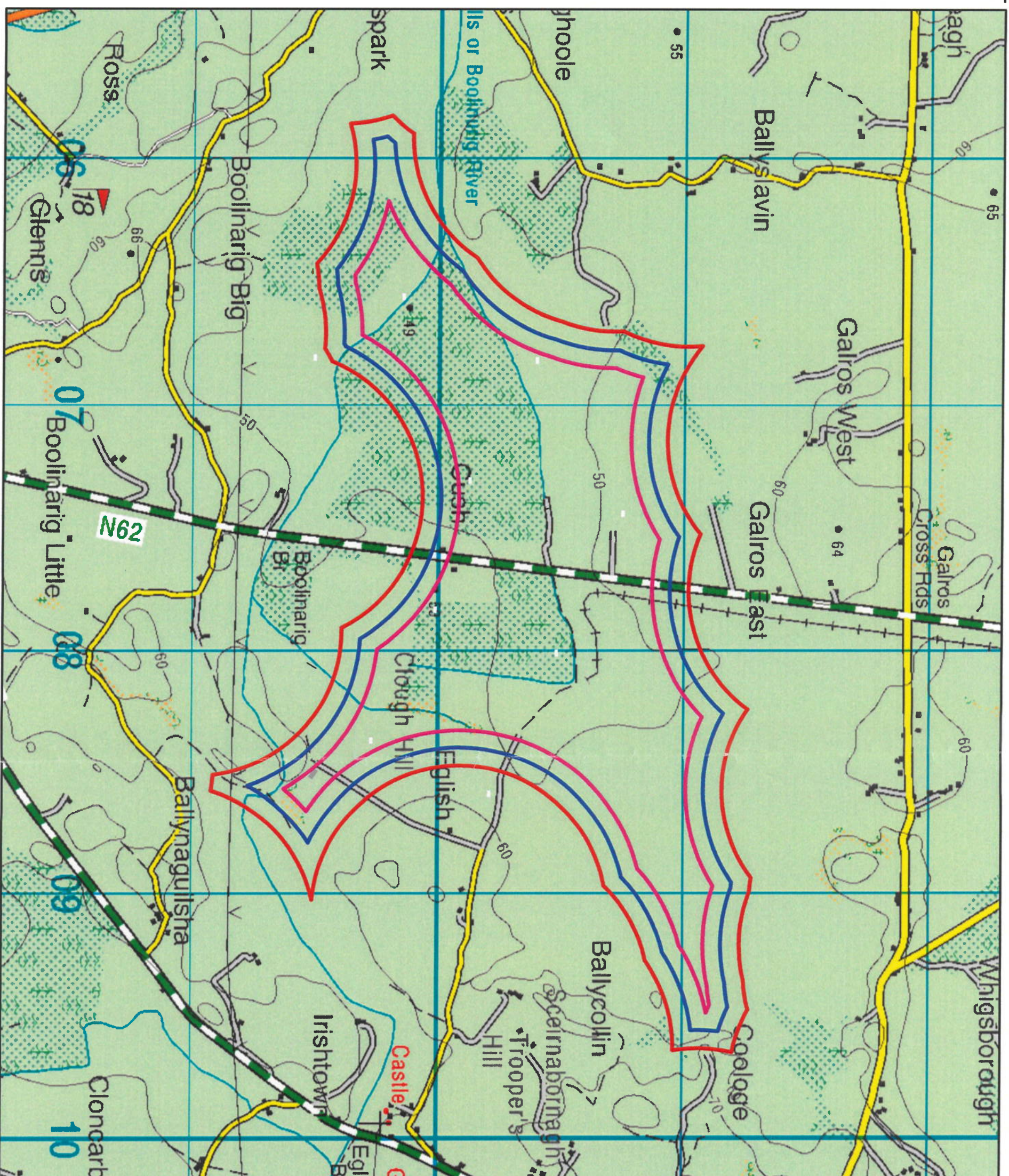
**Annex 1 –
Lands currently being investigated by Galetech Energy Developments Limited**





COMHAIRLE CHONTAE UÍBH FHAILLÍ
06 OCT 2020
PLANNING

Drawing No.:		Revision No.:	
DEV/PLAN2021 -1		0	
Scale:	Date:		
1:50,000 (A3)	25/09/2020		
Drawn By:	Checked By:	Confirmed By:	
S.D.	C.M.P.	J.C.	



- 600 Metre Setback (4 x 150m TH)
(873 Acres)
- 676 Metre Setback (4 x 169m TH)
(665 Acres)
- 740 Metre Setback (4 x 185m TH)
(486 Acres)

COMHAIRL CHONTAE UÍBH FHAMH
06 OCT 2020
PLANNING

[illegible]

Galetech Energy Services

Cush Wind Farm

Wind Development Available Lands

Drawing No.: DEV/PLAN2021 - 2		Revision No.: 0	
Scale: 1:16,000 (A3)		Date: 25/09/2020	
Drawn By: S.D.	Checked By: C.M.P.	Confirmed By: J.C.	