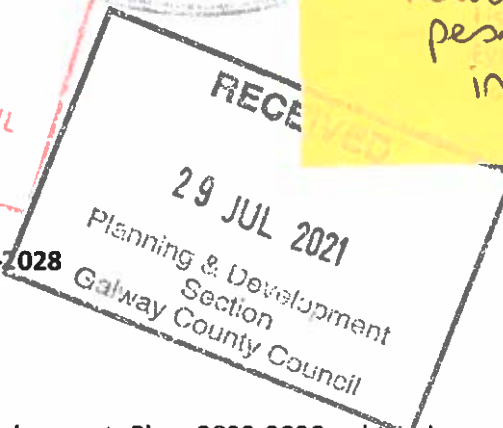
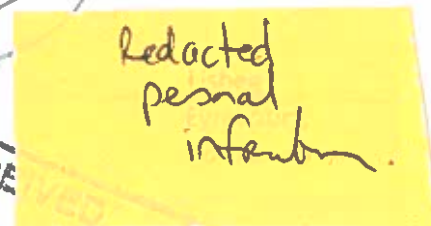


Planning Department,  
Galway County Council,  
Áras an Chontae,  
Prospect Hill,  
Galway.



28th July, 2021



**RE: Draft Galway County Development Plan 2022-2028**

To whom it may concern,

I note with interest the Draft Galway County Development Plan 2022-2028 which is open to public consultation until 30<sup>th</sup> July 2021, and in particular the following draft appendices:

1. 'Appendix 1: Renewable Energy Strategy', &
2. 'Appendix 4: Landscape Character Assessment'

I am the owner of c.485 hectares (c.1,200 acres) at Annaghcorrib, Coolcarta East, Coocarta West, Lisbeg, and Muing townlands, Ballinasloe.

In October 2016 Galway County Council granted permission (15/1571) for a wind farm consisting of five wind turbines and associated works on my property at the above location. This was subsequently appealed to An Bord Pleanála by third parties, with the Bord subsequently refusing planning permission on the 16<sup>th</sup> March 2017 (on the basis of insufficient information relating to ornithology being provided to allow them to complete an appropriate assessment).

I have since continued to work on this proposal and have commissioned the necessary ornithological surveys with the intention to re-apply to Galway County Council for the wind farm. With this in mind, I have paid particular attention to the Draft Galway County Development Plan 2022-2028 and am very concerned with some proposed mapping within the above referenced appendices.

I have attached herewith four plans which compare:

- i. the landscape character sensitivities of the 2015-2021 plan (**Figure 1**) with the proposed draft landscape character sensitivities within the 2022-2028 plan (**Figure 2**), and
- ii. the Strategic Wind Farm Development Areas of the 2015-2021 plan (**Figure 3**) with the proposed draft 'Wind Potential' zones within the 2022-2028 plan (**Figure 4**)

Of significant concern to me is the apparent arbitrary outline of the landscape sensitivity in **Figure 2** which is now proposing a change in landscape sensitivity class from the lowest sensitivity to the second highest sensitivity, which in turn appears to have been used to derive the draft map which I have reproduced as **Figure 4**.

I respectfully request that both of these draft maps be re-evaluated for the following reasons:

1. My landholding, and the application of 15/1571, was previously considered by Galway County Council and recommended for approval. In the Planners Report dated 19<sup>th</sup> October 2016, the planner noted that *'The proposed development has been assessed within the restrictions imposed by the principles of proper planning and sustainable development and having regard to the policies and objectives of Galway County Council as set out in the 2015 - 2021 County Development Plan. Based on this assessment it is considered that the proposed development is in accordance with the proper planning and sustainable development of the area and with the provisions of the County Development Plan 2015-2021.'* [emphasis added]
2. In the Bord's Inspector's Report (PL07.247582) of the third party appeal, under the heading of '7.2 Visual Impact' the inspector concluded that *'The proposed development would not adversely affect the visual amenities of the area or interfere with any heritage features, protected views, prospects or scenic routes in the surrounding area, to any significant extent. Furthermore, the proposed windfarm would not give rise to any significant adverse cumulative impacts in combination with any other windfarms. Plans or projects in the surrounding area'.* [emphasis added]
3. Both Galway County Council (16/168), and subsequently the Bord (PL07.246553), approved planning permission on these lands for a 100m tall meteorological measuring mast. The Planner and the Inspector (respectively) concluded:
  - a. **Planner:** *'The proposed development has been assessed within the restrictions imposed by the principles of proper planning and sustainable development and having regard to the policies and objectives of Galway County Council as set out in the 2015 - 2021 County Development Plan. Based on this assessment it is considered that the proposed development is in accordance with the proper planning and sustainable development of the area and with the provisions of the County Development Plan 2015-2021'*
  - b. **Inspector:** *'Having regard to the nature of the proposed development and its location of the site within an expansive agricultural landholding on lands of low landscape value rating in the Galway County Wind Energy Strategy, forming part of the Galway County Development Plan 2015-2021, it is considered that the proposed wind anemometer would not seriously injure the amenities of the area, including amenities of residential properties in the vicinity and would be consistent with proper planning and sustainable development of the area, subject to the conditions below.'*
4. I have measured wind data on site for a period of in excess of 12 months and commissioned an independent assessment of that data (by DNV-GL), which indicates a wind capacity factor of between 40% & 44%, which proves the commercial viability of the site for wind farm use.
5. Both Galway County Council & the Bord have already indicated that the proposed electricity connection method (as detailed in application 15/1571) to the ESB Networks Somerset 110kV substation as appropriate,

6. ESB Networks indicate that there is adequate generation capacity at this Somerset 110kV substation to receive the clean renewable power which would be generated by my project<sup>1</sup>
7. The existing Shannonbridge 220kV power station is located c.4km from my landholding, on the Offaly side of the county border. Whilst the peat powered generation facility has been decommissioned, the 220kV electricity substation is an important national asset which will remain operational. As a nation we are moving away from fossil fuel powered generation stations in favour of clean renewable energy, such as that which I propose to deliver on my farm – in contrast to that which was operational only 4km away for c. 55 years.
8. In assessing the original proposal referenced above, the Bord concluded (PL07.247582) that the project would:
  - c. *'not adversely affect the visual amenities of the area or interfere with any heritage features, protected views, prospects or scenic routes in the surrounding area, to any significant extent,'*
  - d. *'not give rise to a traffic hazard or endanger the safety of other road users, subject to the full implementation of the mitigation measures and traffic management plans and compliance with planning conditions.'*
  - e. *'not adversely affect residential amenities to any significant extent as a result of noise, vibration, shadow flicker or dust emissions subject to the full implementation of mitigation measures and planning conditions.'*
  - f. *'subject to the implementation of the EIS mitigation measures including ongoing inspections and monitoring, in conjunction with planning conditions which address the concerns of the IFI, the proposed windfarm would not have a significant adverse impact on water quality, aquatic ecology or fisheries.'*
  - g. *'the proposed development, including the grid connection route, would not have any significant, adverse, long term, or permanent impacts on flora and fauna in the area, including mammals, bats, fisheries, amphibians, aquatic invertebrates and most species of bird.'*
  - h. *'not adversely affect cultural heritage or material assets to any significant extent, subject to the full implementation of the archaeological mitigation measures and planning conditions'*
  - i. *'not give rise to a flood risk subject to compliance with the requirements the planning authority.'*
  - j. *'not give rise to any significant adverse cumulative impacts in combination with other windfarms, plans or projects in the surrounding area.'* [all emphasis added]

As outlined on page 1, above, the Bord refused permission for the wind farm on the basis of insufficient wintering bird data to justify the conclusions contained within the EIS & NIS. These ornithological surveys have since been commissioned, in order to supplement a new application for this site.

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<sup>1</sup> <https://www.esbnetworks.ie/network-capacity-map>

Following my review of the Draft Galway Development Plan 2022-2028 it is obvious that Galway County Council's vision continues to be in-line with the National objective of promoting the transition from a fossil fuel powered economy to that of a green economy, and indeed Galway County Council continue to lead the way. However, for my project it appears that an arbitrarily drawn outline of a landscape character area, and indeed the 'promotion' of the landscape sensitivity from the lowest category to the second highest category for no obvious reason could potentially be detrimental to the delivery of a bona fide project, which would otherwise be promoted as sustainable development.

In closing I also include a **Figure 5**, which provides an overlay of the draft 'Wind Potential' map from the draft Renewable Energy Strategy. This **Figure 5** shows the location of my property in relation to the proposed 'Wind Potential' zones shown on **Figure 4**. I note that whilst my entire landholding is now proposed to be located within an area classified as "*Not normally permissible*", c.1.2km away are large swathes of land mapped as "*Open to consideration*", in addition to smaller parcels of land mapped as "*Acceptable in principle*", and indeed 1.2km from my landholding the now proposed landscape character sensitivity drops two places from '*special*' to '*low*'.

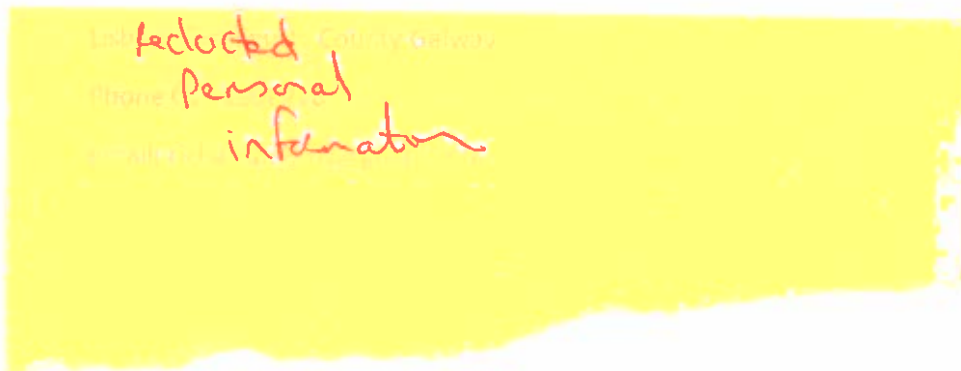
I respectfully request that the Council review and re-evaluate both of these draft maps (i.e. **Figure 2** and **Figure 4** attached) from a planning perspective regarding suitability for renewable energy in the context of the information provided above.

I would happily discuss this matter further with the Council if you wish to contact me direct.

Yours Sincerely,



**Richard Bourns**





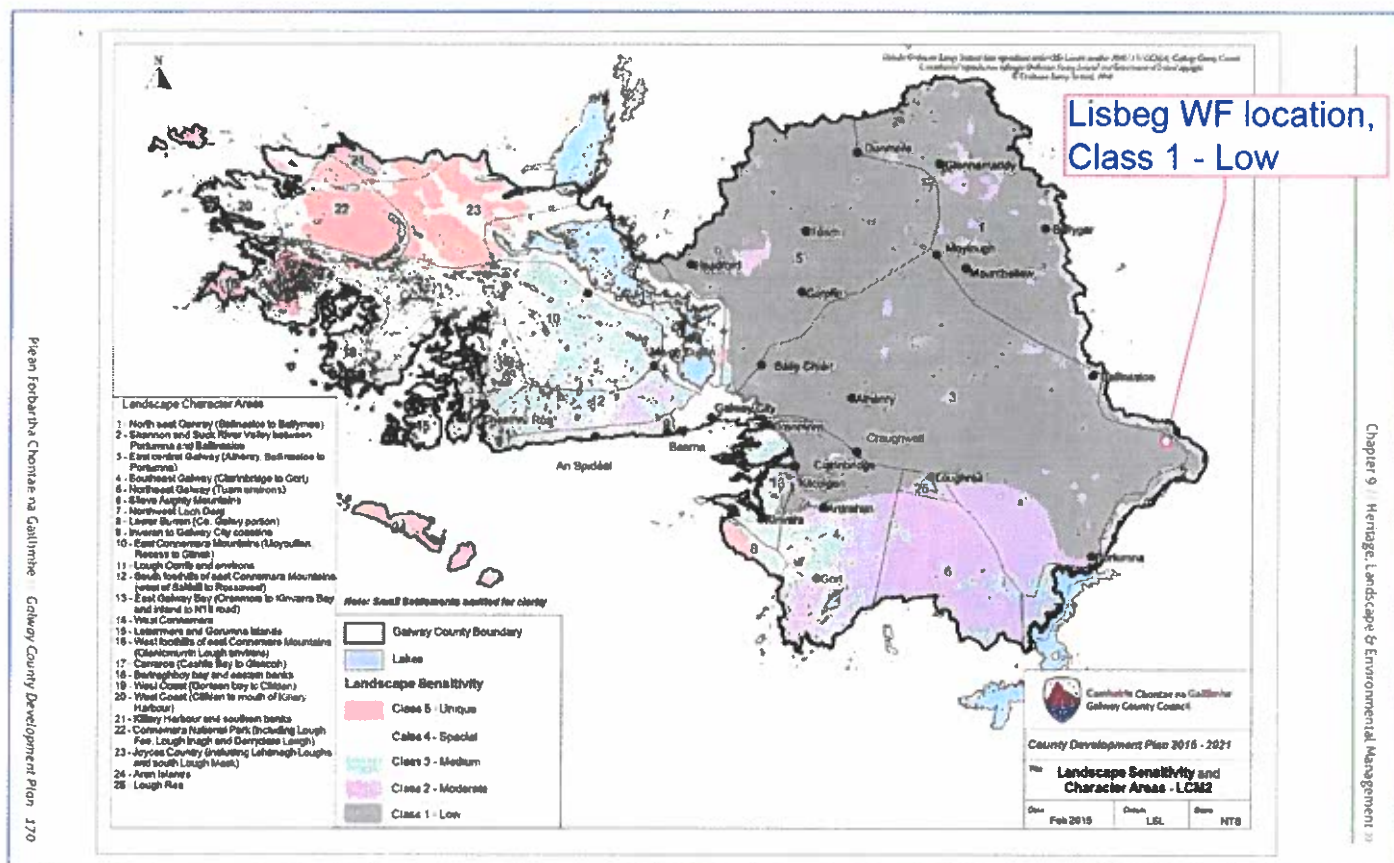


Figure 1: Extract from the Galway County Development Plan 2015-2021

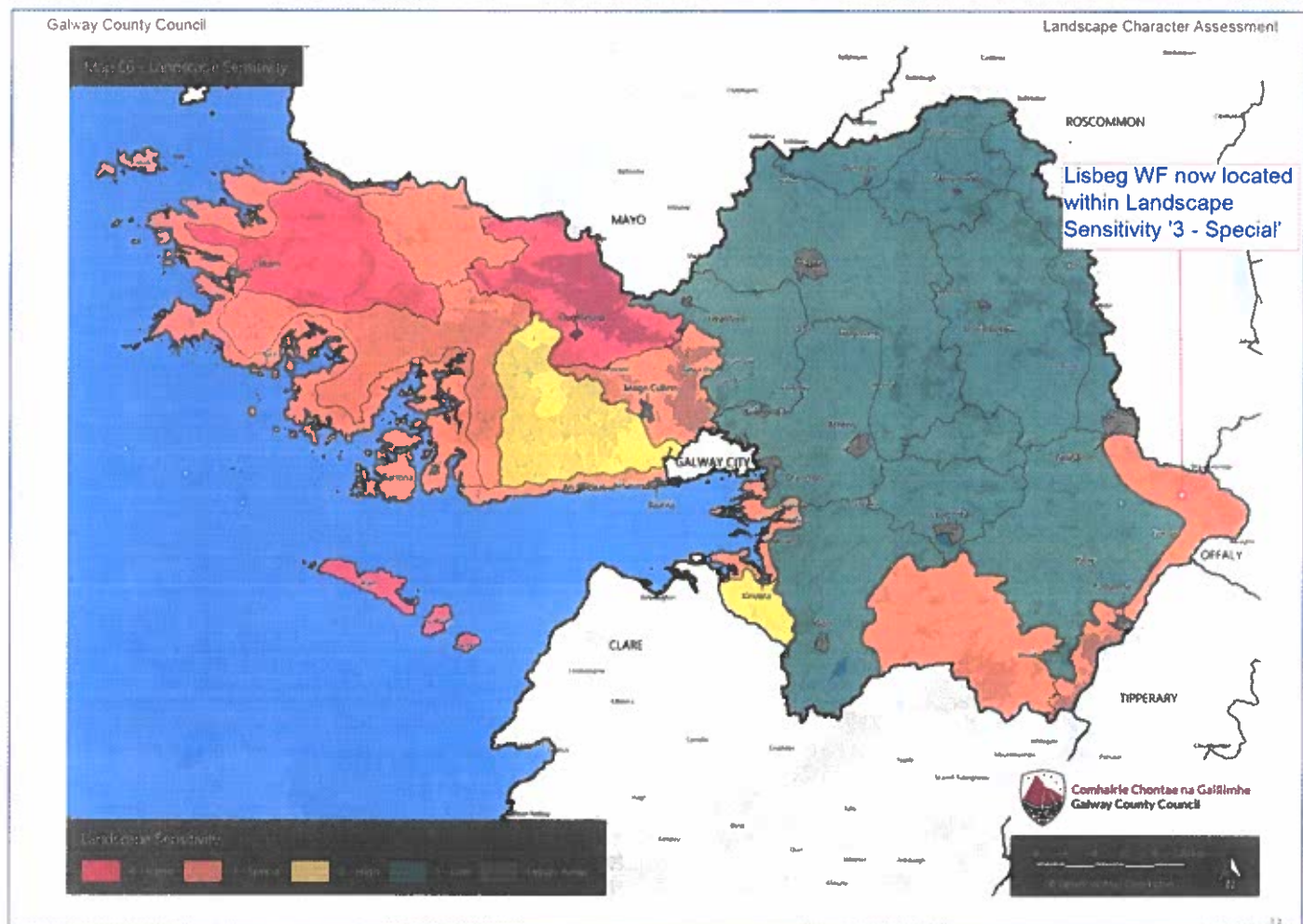


Figure 2: Extract from the Draft Galway County Development Plan 2022-2028

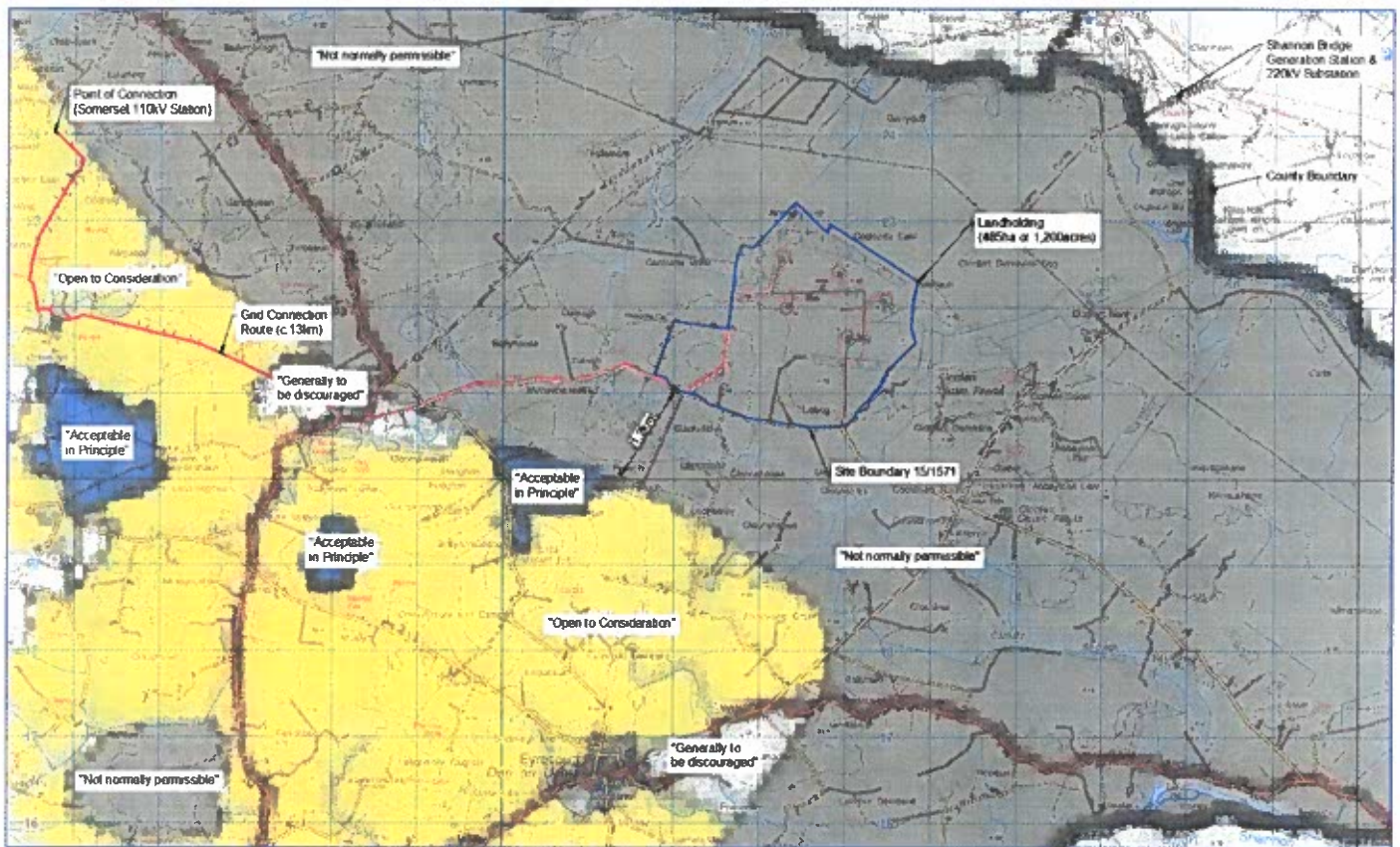


Figure 5: Application 15/1571 overlaid on the Draft Map of Proposed Development Zones



