CARNBUCK WIND FARM

Pre-application Community Consultation (PACC) Report











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1. Introduction

This Pre-Application Community Consultation (PACC) Report outlines how RES has engaged and communicated with the local community to inform them about the proposed Carnbuck Wind Farm, hereinafter referred to as the 'Proposed Development', located in the townlands of Carnbuck, Magheraboy and Moneyneagh, near Corkey, Co. Antrim.

It explains how and when the community was consulted before the planning application was submitted to the Department of Infrastructure Planning (DFI) and how this consultation has shaped the Proposed Development.

On 24th February 2022, RES submitted a Proposal of Application Notice (Form PAN 1) to DFI Planning outlining the form of consultation which RES proposed to undertake. The PACC Report summarises each of those activities and details how comments received from the community were considered and indicating if any changes or mitigating measures have been included in the proposal.

2. RES' Commitment to Consultation

RES is the world's largest independent renewable energy company. At the forefront of the industry for 40 years, RES has delivered more than 23GW of renewable energy projects across the globe and supports an operational asset portfolio exceeding 9GW worldwide for a large client base. RES is active in 11 countries working across onshore and offshore wind, solar, energy storage and transmission and distribution.

RES has developed 22 onshore wind farms in Northern Ireland totalling 246MW and operates over 112MW of wind capacity across Northern Ireland including the recently constructed Craiggore and Evishagaran Wind Farms in Co. Derry/Londonderry.

RES is committed to finding effective and appropriate ways of consulting with all its stakeholders, including local residents and community organisations, and believes that the views of local people are an integral part of the development process. RES wants to be good neighbours to the communities that host our renewable energy projects and will listen to and address questions or concerns that interested parties might have. A comprehensive process that engages with local people and stakeholders at an early stage allows an informed debate that helps us identify issues of potential concern, explore solutions and design a project that will be welcomed as a positive asset by the local community.

3. Statutory Requirements and Best Practice Guidance

On 1st July 2015 a statutory duty on developers to consult with the local community, in advance of submitting a planning application for major and regionally significant development proposals, was introduced.

The legislation requires developers to submit a 'Proposal of Application Notice (PAN)' 12 weeks before submitting a formal planning application for 'Major' applications. The PAN explains how a prospective applicant will engage with the local community and sets out a timetable for the engagement. Once a planning authority receives a PAN, they have 21 days to consider the proposal. RES submitted a PAN to DFI Planning on 24th February 2022. On 9th March 2022 RES received a letter from DFI stating that they had considered the PAN and considered that it contained sufficient information with regards to community consultation measures and, therefore, it was compliant with Section 27 of the Planning Act (Northern Ireland) 2011 and the Planning (Development Management) (Temporary Modifications) (Coronavirus) Regulations (Northern Ireland) 2020 as amended.

The DFI requested that local tourism bodies within 5km of the proposal site and additional parties were consulted on the forthcoming public event and/or provided with information leaflets. An information leaflet regarding the consultation event was provided to these groups and bodies, accordingly.

The guidance suggests that a period of at least 12 weeks should be allowed to undertake the community consultation before submission of an application, and that the pre-application consultation should include a least one public event. The requirement for a public event was suspended during the pandemic emergency period from 1st May 2020 until 31st March 2022. In accordance with this and the guidance's recommendation that a dedicated website serves as a suitable channel of communication, the public exhibition was held online at http://carnbuck-windfarm.co.uk/consultation/.

However, it is noted that the planning application for Carnbuck Wind Farm was not submitted within the emergency period, or within 6 months following the end of the emergency period. Therefore, a public event was required within the locality in which the proposed development is situated. Sections 4 - 5 discuss the consultation process associated with the original Proposal of Application Notice (24th February 2022) and consultation process (online). Section 6 - 8 outlines the second consultation process which was completed due to the lack of planning application submission within 6 months of the end of the emergency period.

Consultation Methodology

The purpose of pre-application community consultation is to improve, where possible, the quality of the proposed planning application by considering public opinions and addressing, wherever possible, any issues raised by stakeholders. It is also intended that any interested stakeholders have access to up-to-date and accurate information regarding the proposal and the opportunity to provide feedback that could be considered prior to the proposed planning application being finalised and submitted.

4.1 Pre-consultation preparation

Prior to undertaking formal public consultation RES undertook desk-based research to identify key stakeholders which are located within the vicinity of the Proposed Development. Those identified included:

- Elected political representatives for Mid & East Antrim Council Braid District Electoral Areas (DEA)
- Elected political representatives for Causeway Coast and Glens Council The Glens District Electoral Areas (DEA)
- North Antrim MLAs and MP
- Community groups, churches and schools within a 5km radius of the proposed site
- Properties within a 3km radius of the proposed site

4.2 First Consultation

The formal consultation began on 24th February 2022. A combination of the following methods was used to inform stakeholders (listed in the above section) about the Development, and subsequently to ascertain their views.

4.2.1 Submitted Proposal of Application Notice - 24th February 2022

RES submitted a PAN to DFI Planning on 24th February 2022. On 9th March 2022 RES received a letter from DFI stating that they had considered the PAN and found that it contained

sufficient information with regards to the suggested community consultation measures and was in compliance with Section 27 of the Planning Act (Northern Ireland) 2011.

The submitted information included details of the site location, the type of consultation methods that would be undertaken, with whom and within what distance from the site.

4.2.2 Letter to Elected Political Representatives - 28th February 2022

RES wrote to all Councillors from the Braid DEA of Mid and East Antrim Borough Council and The Glens DEA of Causeway Coast and Glens Council, North Antrim MP and MLAs, to advise them that RES were investigating the potential for a wind farm development at the site location and would commence a number of consultation activities shortly including newsletter distribution, a dedicated project website and an online public exhibition. The letter also invited these representatives to contact us if they wished to arrange a meeting to discuss the proposal. A copy of the PAN1 was enclosed with each letter. A copy of the letter can be found at Appendix A.

4.2.3 Project Website - 16th March 2022

A project website was launched at www.carnbuck-windfarm.co.uk containing information on the project, information regarding the forthcoming open public exhibition as well as contact details for the RES project team.

The project website is updated regularly and will also be updated when the planning submission is made, to include links to all planning application documentation.

4.2.4 Elected Representative Pre-Exhibition Mailing - 16th March 2022

A newsletter was emailed to all Councillors from the Braid DEA of Mid and East Antrim Borough Council, The Glens DEA of Causeway Coast and Glens Council and the MP an MLAs for North Antrim.

The newsletter, which can be found at Appendix B, included basic information about the project, how to make comments on the proposal and when these should be submitted by, a location map, details of the online public exhibition and RES' contact details. The leaflet stated RES' intention to submit a planning application in the coming months.

4.2.5 Community Pre-Exhibition Mailing - 17th March 2022

A newsletter was posted to:

- Residential addresses within 3km of the proposed site (417 addresses)
- Community groups, schools and churches within 5km of the site including tourism bodies and additional parties as advised by DFI (25 addresses). This list can be found at Appendix C.

The newsletter, which can be found at Appendix B, included basic information about the project, how to make comments on the proposal and when these should be submitted by, a location map, details of the online public exhibition and RES' contact details. The leaflet stated RES' intention to submit a planning application in the coming months.

4.2.6 Pre-Exhibition Advertising - 16th & 17th March 2022

RES placed an advertisement in two local papers to inform the wider community of the online public exhibition. The advertisement appeared in the Ballymoney and Moyle Times on Wednesday 16th March 2022 and the Ballymoney Chronicle on Thursday 17th March 2022. A copy of the advertisement can be found at Appendix D.

4.2.6 Online Public Exhibition - 31st March 2022

The online public exhibition took place on Thursday 31st March 2022. Further information on the project, including a welcome video, visualisations and a draft layout of the wind farm, was published on the project website. Screenshots of the project information can be found at Appendix E.

For people without internet access, hard copies of the exhibition were available upon request. One request for a hard copy was received from a local resident. RES also provided a number of hard copies of the information and comments forms to a local community association, to be made available to members of the community.

Individual telephone and video call appointments were offered between 10am - 2pm and 4pm - 8pm as part of the event. These timings enabled a wide cross section of the local community and stakeholders the opportunity to attend a telephone or video call appointment, if required. A local community association booked a video call appointment for 15:00 and one local resident booked a video call appointment at 16:00.

The first meeting at 15:00 was with a local community association. The meeting was held on Zoom and was attended by two representatives from the community association and two representatives from RES.

The second meeting at 16:00 was with a local resident who lives in one of the properties closest to the proposed site. The meeting was held on Microsoft Teams and attended by the local resident and two representatives from RES.

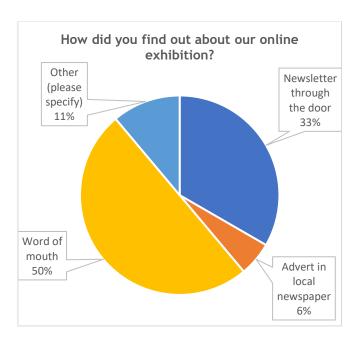
In the period 31 March to 22 April, which was the closing date for comments to RES, the website had 555 views from 143 users. Each user viewed the website, on average, 3.8 times and the average engagement time was 1 minute, 24 seconds.

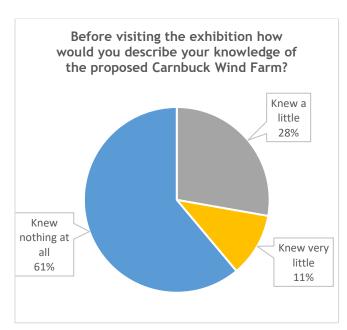
A comments form was provided as part of the online public exhibition to encourage feedback from attendees about renewable energy in general, as well as the project design specifically, and was made available as an online form or as a Microsoft Word version.

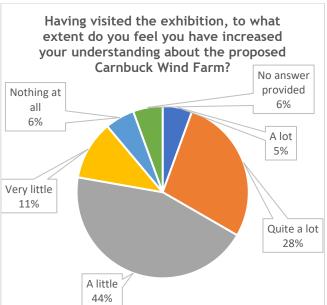
People who requested a hard copy of the exhibition material were also provided with a hard copy of the comments form. Visitors to the online public exhibition were advised that the closing date for comments was Friday 22nd April 2022. The same information was provided in the hard copy exhibition pack.

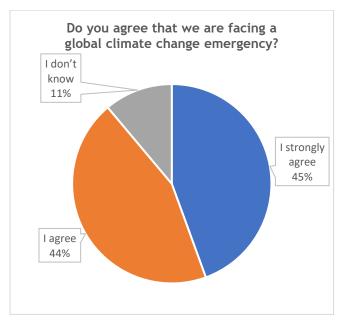
Eighteen completed comments forms were received by RES. Below is a summary of the feedback received to the questions on the comments form. Redacted copies of the comments forms are supplied in Appendix F.

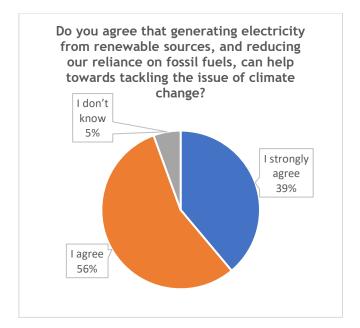
At all stages of the consultation process, RES set out clearly the purpose of the consultation. Throughout the process RES also emphasised that comments made were not representations to the DFI and that there would be the opportunity for representations to the DFI once the planning application was submitted.

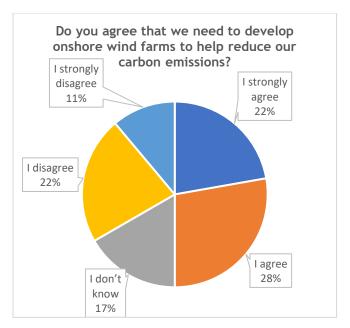


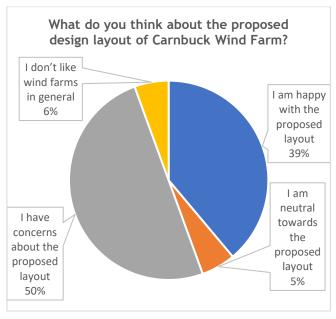












4.2.8 Other Correspondence - various

In addition to the activities outlined above, RES has been receiving and responding to enquiries and comments from the local community, via telephone and email.

To date, correspondence has been received, and responded to, from three local residents and one MLA.

RES will continue to respond to any queries received in relation to the project from the local community, stakeholders and statutory consultees throughout the pre-application and determination periods.

4.3 Summary of First Consultation

In summary, a range of engagement and communication activity was undertaken as part of the first consultation - reaching both nearest neighbours to the site as well as audiences in the wider Mid and East Antrim and Causeway Coast and Glens Borough Council areas. This activity included:

- Letters to Local Political Representatives;
- Advertisements for the Online Public Exhibition in the local press;
- A newsletter informing local residents and local community groups about the Online Public Exhibition:
- · An Online Public Exhibition; and
- Project website.

This form of pre-application community consultation is in accordance with what is recommended within the "Pre-Application Community Consultation Guidance - June 2014".

All feedback received during the pre-application community consultation, through all consultation activities, has been considered by RES throughout the design iteration and pre-planning stages of the Proposed Development. A summary of feedback, issues and concerns raised, together with the Applicant's response to each can be found in section 5.

5. Feedback and Applicant's Response

The majority of the feedback received during the pre-application consultation period was from comments forms received following the online public exhibition. Feedback has also been received in the form of separate correspondence by email and telephone. A summary of issues and feedback raised, together with RES' response to each issue, can be found in Table 1. Redacted copies of the comments forms can be found in Appendix F.

Table 1

Issue/Concern Raised **RES** Response to Issue/Concern Landscape and Visual The Environmental Statement (volumes 1 to 4) The proposed array will hugely impact submitted with the planning application view in an Area of Outstanding Natural includes a detailed Landscape and Visual Impact Beauty. Assessment (LVIA) in Chapter 4. The turbines are intrusive on the sight The LVIA includes an assessment of impacts on line. the Antrim Coast and Glens Area of Outstanding Natural Beauty, and a cumulative landscape and I think we have more than our fair share of visual assessment taking into account existing, windmills. consented and proposed wind farms in the study area. At 180m tip height, these turbines would be huge, unsightly monstrosities, Input in relation to turbine height was sought significantly bigger than the adjacent from the LVIA consultant at an early stage of (existing and consented) turbines. the project development. Examination of the proposed Carnbuck Wind Farm in relation to the Be more upfront & transparent on how this height and geometry of the existing Corkey and 180m tip height compares to the adjacent Gruig Wind Farms, and the consented Corkey (existing and consented) turbines. Repower Wind Farm, is provided in the LVIA.

The proposed location of turbine nos 1-6 are particularly objectionable, protruding out from the existing Gruig windfarm in a southwesterly direction (which bring them closer & more prominent to the populated areas that they look down on). Turbine No.s 7-12 are at least set back in to the hills a little more.

Various suggestions and requests made about viewpoint locations including suggestions for viewpoints at:

- where Loughill Road meets Lislaban Road
- where Rosedermot Road meets Moneyduff Road
- Cloughmills
- the top of Skerry West Road.

- During the pre-application consultation a number of viewpoints were requested/suggested by respondents. These requests were passed to the LVIA consultant for consideration.
- The viewpoint selection process identifies a number of key visual receptors in the study area including: residents of rural properties and settlements located in close proximity to the proposed wind farm but also elsewhere in the study area; tourists on scenic routes, footpaths and cycle routes throughout the study area: receptors located within the AONB with views ranging from close range to those located at greater distances with an appreciation of the wider landscape setting and visibility of the proposed wind farm in the context of this setting. In total 60 provisional viewpoints were considered initially, which were refined to 26 viewpoints chosen for the final assessment, included in the LVIA. The final viewpoints are intended to represent typical views of the proposed wind farm that are likely to be obtained in different parts of the study area, from key locations and by key visual receptors.
- Our LVIA consultant prepared wirelines from the locations suggested, which were provided to the respondents. Comments in relation to each suggested viewpoint are provided below:
- Junction of Loughhill and Lislaban Roads: The wireline indicates visibility of the existing Corkey wind farm and the consented Corkey Repower turbines, no visibility of the existing Gruig wind farm, and visibility of the upper parts of six of the proposed Carnbuck turbines. The viewpoint hasn't been shortlisted for inclusion in the final LVIA in favour Viewpoint 3 (junction of Ballyveely and Ballyweeny Roads) located slightly further to the north which offers clearer and more extensive views of the proposed wind farm. However the analysis of Viewpoint 3 included in the LVIA includes consideration of the nature of views from the surrounding roads.
- Junction of Rosedermot and Moneyduff Roads:
 The wireline was reviewed but wasn't selected for inclusion in the LVIA because it indicates similar visibility to that represented by Viewpoint 4 (Omerbane Road near junction with Tullykittagh Road), which is located slightly closer to the proposed turbines, and by Viewpoint 10 (layby on the B94 at edge of Cloughmills village) which is located slightly further away. Both are located in the same part of the study area and analysis of these two

viewpoints in the LVIA includes consideration of the nature of views from the surrounding roads.

- A viewpoint from Cloughmills (Viewpoint 10 from the layby on the B94 at edge of Cloughmills) is included in the final LVIA. A photomontage of the draft wind farm layout from this location was provided to the respondent during the consultation.
- Provisional viewpoints near the upper end of Skerry West Road were considered as part of the viewpoint selection process. Ultimately these were not included in the LVIA due to the low number of potential visual receptors (it is not a through road), and the orientation and screening at the properties in the area are likely to obstruct clear views in the direction of Carnbuck. A wireline from the area was provided to the respondent. A viewpoint from Skerry West Road at the junction with Omerbane Road is included in the final LVIA at Viewpoint 5.

Consultation

More information [required] including being open about the negative impacts particularly to birds and local residents

Better renders of local roads - the viewpoints were selective to minimise the impacts.

The noise information is generic, out of date and useless. No reference to planning guidance and how it is being fulfilled (it isn't).

The questions are limiting - leading responses to be moderated. The questions are general questions about renewable energy and do not specifically address the proposal. This leads respondents into an ethical argument about climate change and not about the proposal.

Improve questions and feedback from - inadequate.

Offer more visualisations and more information regarding noise and flicker. Feedback form terrible.

The questions are leading and not genuine attempt to gather local views, criticism and suggestions for improvement.

- The layout of the wind farm has been developed iteratively through the environmental impact assessment (EIA) and consultation process.
- At the time of the exhibition the layout of the wind farm had not been finalised, and as such, it was therefore not possible to provide detailed assessments as they had not been concluded. For the exhibition we provided information, including a preliminary layout and a small number of representative photomontages to provide the local community with an idea of what the wind farm may look like from a range of viewpoints.
- The planning application, based on the finalised layout, is supported by a detailed Environmental Statement (ES), including a nontechnical summary, which is available for people to read and comment on to DfI through the planning process.
- Chapter 8 of the ES considers ornithology. Impacts on people will be covered in several chapters including Chapter 11 (noise), Chapter 4 (landscape & visual), Chapter 12 (traffic & transport) Chapter 13 (shadow flicker) and Chapter 14 (socioeconomics). Each chapter will detail the relevant policy and guidance that has been considered in the assessment. In addition, Chapter 2 of the ES will specifically consider policy.

Improve online feedback form.

- The final landscape & visual assessment (Chapter 4 of the ES) includes visualisations of the final layout from 26 viewpoints with justification provided for the viewpoints selected.
- The comments form was designed to capture people's views on the online exhibition, wind farms in general, as well as their views on the proposed Carnbuck Wind Farm specifically on the design of the project as this is the area where people's comments can have a direct influence on the design. There was space to allow people to provide further comments or opinions on the proposal such as whether they support or object to the proposal but the main focus was on design-related comments as these were then considered in relation to the design development.
- RES will take account of the feedback regarding the questionnaire in future consultations.

Environment, Ecology and Ornithology

Hugely impactful to local communities, bird and sensitive peatland habitat.

The entire site is a recognised endangered bird habitat.

The site was originally allocated as mitigation habitat for the construction of Gruig windfarm - the site is sensitive, protected and supposed mitigation of the existing windfarms.

T4 T5, T6, T7, T8, T9, T10, T12 all fall within sensitive active peat habitat which planning clearly states should not be developed for windfarms.

Ensure building takes into account potential impact on wildlife - curlew breeding, hen harriers, Irish Hares, etc.

- RES has undertaken a full EIA to determine the likelihood of any potential impacts on the environment, ecology and ornithology. The results of the EIA are described in the ES (Vol 1-Vol 4).
- A non-technical summary is also available.
- Chapter 6 considers Vegetation & Peatland, Chapter 7 considers Terrestrial Fauna and Chapter 8 considers ornithology. Impacts on people will be covered in several chapters including Chapter 11 (noise), Chapter 4 (landscape & visual), Chapter 12 (traffic & transport), Chapter 13 (shadow flicker) and Chapter 14 (socioeconomics).
- An outline Habitat Management Plan has also been proposed and included in Chapter 6 (Vegetation & Peatland) of the ES.

<u>Access</u>

Consider integrating access for hikers and any impact on used trails.

Will be affected by the huge levels of HGV traffic on local roads. Ensure local roads are properly repaired after.

- There are no publicly accessible trails or footpaths within the wind farm site boundary.
- Traffic and transport have been assessed in Chapter 12 of the ES. Whilst there will be a significant increase in HGV traffic on local roads during the construction period, a Traffic Management Plan (TMP) will be prepared by RES in consultation with the Dfl, the local PSNI and the local community with the aim of minimizing

disruption as far as possible, including avoiding school pick-up/drop-off times etc.

- The TMP will include details about Video Surveying and Road Repairs. A video survey of the pre-construction condition of all public roads will be recorded around the site entrance and access routes to provide a baseline record of the state of the roads prior to construction work commencing. This will enable any repairs and maintenance work required to the relevant road due to any damage caused by the passing of heavy vehicles associated with the wind farm construction to be identified following the construction phase.
- The roads will be returned, at minimum, to the baseline condition at the end of the construction phase. Any damage caused by wind farm traffic during the construction period, which would be hazardous to public traffic, will be repaired immediately. These works will be carried out under permits with DfI Roads, as appropriate.

Need for the project

NI has reached onshore capacity - further development will be more negative impact than benefit. Offshore and brownfield solar need investment.

Onshore windfarms are favourable as they are the most profitable in near-future terms. They are also some of the most impactful. Other options offer less environmental and social impact, including well -sited offshore, solar arrays and nuclear. NI has amongst the highest density of onshore windfarms in the world.

Other technologies need investment as part of a diverse strategy.

Unbiased reports demonstrate that a diverse renewable strategy which include nuclear and solar offers a more robust energy infrastructure.

The more the merrier.

Invest in offshore wind technology.

Very supportive of green energy.

- Renewable energy is vital towards our transition to net zero and onshore wind, being a free and inexhaustible resource has an important role to play as part of a balanced energy mix. Research from the Department of Business, Energy & Industrial Strategy (BEIS) clearly shows that onshore wind alongside large scale solar are the cheapest electricity generating technologies available. This makes onshore wind developments, like Carnbuck, not just good for the environment but also the consumer.
- Carnbuck would be capable of providing clean, low-cost renewable electricity for nearly 55,000 homes, making a positive contribution to the new energy strategy - The Path to Net Zero Energy, which has a target to meet at least 80% of electricity consumption from renewable sources by 2030.
- whilst Northern Ireland has been successful at utilising its natural resources, to meet its electricity needs, 55% of electricity consumption still comes from fossil fuels. Renewable electricity will become not only more important within the power sector but increasingly central to supplying Northern Ireland's other energy needs. To achieve a renewable electricity consumption target of at least 80% it is expected that the renewable generating capacity will need to double, in order to meet new demands from heating homes and powering vehicles.

- Because of how the energy market works in the UK, prices are based on the highest cost energy source. At this time that is gas. Carbon Brief analysis shows that nearly 90% of the increase in bills over the last year is due to the rising price of gas, which has more than tripled over the same period with most of the remaining increase in bills is due to the cost of energy suppliers going out of business.
- While the UK has gone a long way to move away from fossil fuels and into renewables, we still have a system that is reliant on global gas supplies for our electricity and heating. Building more home-grown renewables will mean we don't have to rely on volatile gas pricing and will bring the cost down over time and increase security of supply.

Efficiency

Wind Power is totally unreliable as a power source, hence the need to be able to generate the equivalent wind generated power via other means. As extreme cold winter spells usually coincide with light (or zero) winds, it is all totally pointless. Northern Ireland has enough of these white elephants littering the landscape.

- Wind turbines tend to generate electricity for around 80-85% of the time, but wind speeds vary and this has an impact on how much power is produced. However, as the grid system becomes increasingly powered by onshore wind and other renewables, it has become much more diverse and distributed.
- Our grid is becoming smarter to match supply and demand. The UK's reliance on the use of natural gas to balance it will reduce as we see larger amounts of energy storage in the system. Systems like batteries and electric vehicles, as well as green hydrogen, are able to store surplus energy from renewables and release it when required.
- BEIS issued a consultation in 2021 to look at bringing forward large scale and long duration storage in the UK - this might be in the form of large pumped hydropower, large electricity batteries and green hydrogen.

Local Benefit

Give local residences 1% each of windfarm turnover.

An annual investment in the community or investment into specific projects - e.g. lighting or footpaths on rural roads where there are none currently, funding a small community garden etc.

Recruiting jobs locally should the planning application be approved, and construction go ahead.

- As we transition to a net-zero future, RES' priority is to deliver clean, green electricity at the lowest cost for consumers.
- Analysis on electricity generation costs published by BEIS has shown that onshore wind and large-scale solar PV are the cheapest electricity generating technologies available, benefitting all consumers.
- Carnbuck Wind Farm, if consented, would continue to build on the success of the renewable energy sector in Northern Ireland. The project is expected to deliver approximately £3.3 million of inward investment into the local area in the form of

Perhaps local people could receive an allowance each year to help with electricity bills.

No local benefit other than selective companies.

Limited local benefit to preferred contractors. Although history demonstrates that even this is minimal.

Windfarms provide minimum local benefit to a few select families, some local groups are paid for their support.

Consider local sponsorship.

Local benefits informed by the community is important.

jobs, employment, and use of local services, providing a vital economic boost, creating skilled, sustainable jobs and helping to drive a cleaner and more resilient economy.

- Furthermore, if consented, Carnbuck Wind Farm would deliver around £12.52 million in business rates over its lifetime supporting vital local services for all local residents.
- schemes should also provide meaningful benefits locally and are inviting input from the local communities on their priority aims and projects in their area. We're looking for feedback to understand what projects could be supported directly. The type of projects envisaged are initiatives like fuel poverty schemes, improvements to local community facilities, further education and apprenticeship schemes or other priorities as determined by local action plans.

Subsidies and Support Mechanisms

Destroying the landscape with any more windfarms is a total waste of taxpayers' money. The only reason we have so many is due to the ridiculous level of taxpayer subsidy.

 Since 2017, onshore wind developments have received no subsidy. Despite this, analysis on electricity generation costs published by the UK Government's Department for Business, Energy and Industrial Strategy shows onshore wind, alongside large-scale solar, offers the most cost-effective choice for new electricity in the UK, making developments like Carnbuck not just good for the environment but also for the consumer.

Planning Policy

Amend layout to meet planning requirements.

The site is over 700 acres, yet the proposed array still fails to meet planning requirements.

The Carnbuck windfarm does not meet the general planning requirements of 10 times rotor length from the nearest resident.

Fails to comply with planning requirements from the outset.

The proposed layout is not compliant.

T5 & T6 fall well within the planning recommended exclusion zone of 10 times rotor diameter.

Several turbines are within planning stated exclusion zone.

- Planning policy states that for wind farm development a separation distance of 10 times rotor diameter to the occupied property, with a minimum distance not less than 500m, will generally apply. Planning Appeals Commission interpretation in respect of the 10 rotor diameter distance is outlined in the following appeal cases PAC Refs: 2012/A0070, 2013/A0220, 2014/A0285, 2015/A0200, 2017/A0050, 2018/A0199 where in summary a degree of latitude can be applied to separation distances and the 10 times rotor diameter need not rigidly be applied. This would reflect Policy RE1 of PPS18 which references that the consideration of the appropriate separation distances will 'generally' apply.
- An assessment of the proposed Carnbuck Wind Farm against planning policy is provided in Chapter 2 of the ES. This includes an assessment of the project in relation to the 10 times rotor diameter with consideration of the properties that lie within this distance.

	:	In addition, each of the technical ES chapters details the policy and guidance relevant to its specific topic area that has been considered in the assessment.
Grid Connection Is a new grid connection needed or will it connect into the existing overhead line (OHL). Puzzled as to how room is available on the grid as independent planning applications for windmills are still being refused		Although a grid connection is an integral, requisite part of any wind farm project, it typically follows a completely separate consenting route. In this case, an application will be made to Northern Ireland Electricity Ltd (NIE) or SONI Ltd if the wind farm is consented. Whilst the grid connection application is typically made post-consent, potential impacts from the grid connection route have been assessed in the Chapter 1 of the ES (Appendix 1.4).
	1	Based on RES's knowledge of the grid connection system and NIE's published plans for future upgrades, RES has been able to undertake an assessment to determine the grid connection option most likely favoured by the network operator, which is proposed to Rasharkin Substation. This would be connected by approximately 23 km of underground cable.
Shadow Flicker Believe shadow flicker will exceed limit.		An assessment of shadow flicker is provided in Chapter 13 of the ES.
Noise Do not believe the proposed wind farm will be able to meet noise limits.		An assessment of noise is provided in Chapter 11 of the ES.

Second Consultation

As previously discussed, the planning application for Carnbuck Wind Farm was not submitted within the emergency period, or within 6 months following the end of the emergency period. A public event was required within the locality in which the proposed development is situated. Therefore, a second period of consultation was required.

The second formal consultation began on 11th November 2022. A combination of the following methods was used to inform stakeholders (listed in section 4.2) about the Development, and subsequently to ascertain their views.

6.1.1 Submitted Proposal of Application Notice - 11th November 2022

RES submitted a PAN to DFI Planning on 11th November 2022. On 17th November 2022 RES received a letter from DFI stating that they had considered the PAN and found that it contained sufficient information with regards to the suggested community consultation measures and was in compliance with Section 27 of the Planning Act (Northern Ireland) 2011. The submitted information included details of the site location, the type of consultation methods that would be undertaken, with whom and within what distance from the site.

An amendment to the PAN form was completed, which involved the changing of the public exhibition date and time. The amended PAN was issued to DFI Planning on the 5th of January 2023. On the 6th of January 2023 RES received a letter from DFI stating that they considered the revised date and time for the statutory public event under Regulation 5 of The Planning (Development Management) Regulations (Northern Ireland) 2015 is acceptable as an amendment to your original PAN. The DFI Planning considered that the advice provided in their original response of 17th of November 2022 to the updated PAN application is still applicable. A copy of the DFI letter is presented in Appendix G.

6.1.2 Letter to Elected Political Representatives - 11th November 2022

On 11th November 2022 RES wrote to all Councillors from the Braid DEA of Mid and East Antrim Borough Council and The Glens DEA of Causeway Coast and Glens Council, North Antrim MP and MLAs, to advise them that RES were investigating the potential for a wind farm development at the site location and that RES hoped to submit a planning application early in 2023.

The letter also invited these representatives to contact us if they wished to arrange a meeting to discuss the proposal. A copy of the letter can be found at Appendix H.

6.1.3 Elected Representative Pre-Exhibition Mailing - 4th January 2023

A newsletter was emailed to all Councillors from the Braid DEA of Mid and East Antrim Borough Council, The Glens DEA of Causeway Coast and Glens Council and the MP an MLAs for North Antrim on the 4^{th} of January 2023.

The letter informed councillors about the public exhibition on Tuesday the 17th of January 2023 from 4-8pm.

6.1.4 Elected Representative Pre-Exhibition Mailing - 6th January 2023

A newsletter was emailed to all Councillors from the Braid DEA of Mid and East Antrim Borough Council, The Glens DEA of Causeway Coast and Glens Council and the MP an MLAs for North Antrim.

The email explained that the date for the public exhibition had changed from the previous date and time of Tuesday the 17th of January 2023 to Thursday the 26th of January 2023 from 4pm-8pm. An updated PAN1 was also attached to the email.

The newsletter, which can be found at Appendix I, included basic information about the project, how to make comments on the proposal and when these should be submitted by, a location map, details of the public exhibition and RES' contact details. The leaflet stated RES' intention to submit a planning application in the coming months.

6.1.5 Community Pre-Exhibition Mailing - 6th January 2023

A newsletter was posted to:

- Residential addresses within 3km of the proposed site (387 addresses)
- Community groups, schools and churches within 5km of the site including tourism bodies and additional parties as advised by DFI (25 addresses). This list can be found at Appendix C.

The newsletter, which can be found at Appendix I, included basic information about the project, how to make comments on the proposal and when these should be submitted by, a location map, details of the online public exhibition and RES' contact details. The leaflet stated RES' intention to submit a planning application in the coming months.

6.1.6 Pre-Exhibition Advertising - 11th & 12th January 2023

RES placed an advertisement in two local papers to inform the wider community of the online public exhibition. The advertisement appeared in the Ballymoney and Moyle Times on Wednesday 11th January 2023 and the Ballymoney Chronicle on Thursday 12th January 2023. A copy of the advertisement can be found at Appendix J.

6.1.7 Public Exhibition - 26th January 2023

The public exhibition took place on Thursday 26th January 2023 from 4pm-8pm in The Millennium Centre, Loughgiel, BT44 9JN. The venue had been previously identified through background research and it was selected for its proximity to the Proposed Development and its accessibility for local people. The public exhibition was open from 4pm to 8pm to enable a wide cross section of the local community and stakeholders to attend, including people returning from work.

RES staff members were present during the public event to discuss the proposals with attendees, covering a range of specialisms, including technical, construction, environmental, development and community relations.

The exhibition was attended by 7 people. Images of the public exhibition set up are presented in Appendix N. The attendees were interested individuals from the local area. Attendees were asked to sign a visitor book on entry to the exhibition.

Information banners covering the following topics were on display at the public exhibition (Appendix K):

- About the Project
- Site Layout
- Environmental Studies

- Supply Chain Opportunities
- Traffic and Transport
- Noise
- Why Wind
- RES in NI
- Have your say

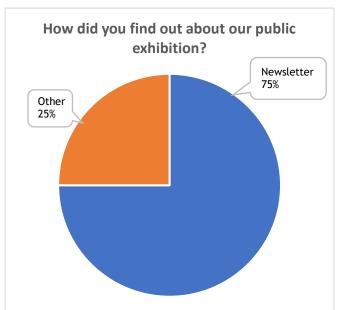
In addition to the information banners the following visualisations were on display:

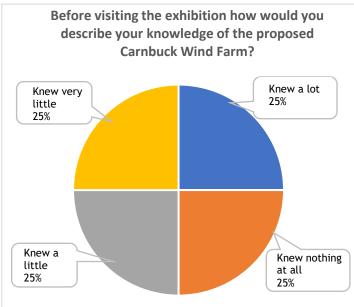
- List of Landscape and Visual Impact Assessment Viewpoints
- Landscape and Visual Impact Assessment Viewpoint Selection Map
- Zone of Theoretical Visibility (ZTV)
- Photomontages from selection of provisional viewpoints (VP 1, VP2, VP3, VP4, VP5, VP7, VP8, VP12). These photomontages were selected as showing a range of views but were predominantly the closest to the Development.

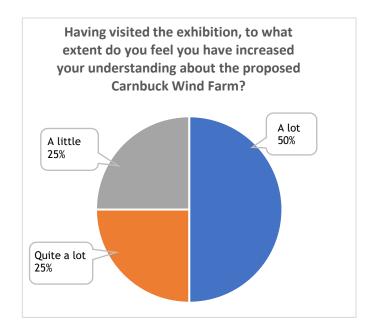
Attendees were able to discuss aspects of interest and question RES staff on a variety of issues (summarised in Table 2, Section 7 of this report). A feedback questionnaire was also provided, to elicit responses from attendees about renewable energy and the project specifically.

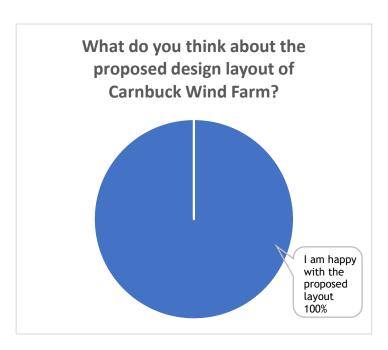
At all stages of the consultation process, RES set out clearly the purpose of the consultation. Throughout the process RES also emphasised that comments made were not representations to the DFI and that there would be the opportunity for representations to the DFI once the planning application was submitted.

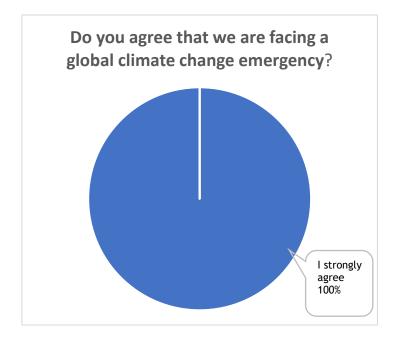
Four completed comments forms were received by RES. Below is a summary of the feedback received to the questions on the comments form. Redacted copies of the comments forms are supplied in Appendix L.

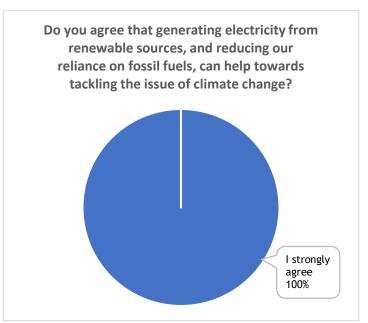


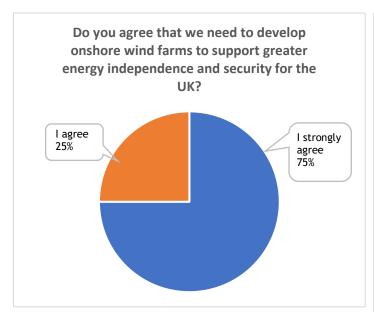


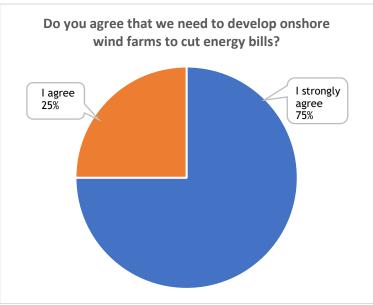












6.1.8 Other Correspondence - various

In addition to the activities outlined above, RES has been receiving and responding to enquiries and comments from the local community, via telephone and email.

To date, correspondence has been received, and responded to, one local resident.

RES has also met with one Councilor from the Mid and East Antrim Borough Council to discuss the project.

RES will continue to respond to any queries received in relation to the project from the local community, stakeholders and statutory consultees throughout the determination period.

6.2 Summary of Second Consultation

In summary, a range of engagement and communication activity was undertaken as part of the Pre-Application Community Consultation - reaching both nearest neighbours to the site as well as audiences in the wider Mid and East Antrim and Causeway Coast and Glens Borough Council areas. This activity included:

- Letters to Local Political Representatives;
- Advertisements for the Online Public Exhibition in the local press;
- A newsletter informing local residents and local community groups about the Online Public Exhibition;
- An Online Public Exhibition; and
- · Project website.

This form of pre-application community consultation is in accordance with what is recommended within the "Pre-Application Community Consultation Guidance - June 2014".

All feedback received during the pre-application community consultation, through all consultation activities, has been considered by RES throughout the design iteration and preplanning stages of the Proposed Development. A summary of feedback, issues and concerns raised, together with the Applicant's response to each can be found in section 7.

7. Feedback and Applicant's Response

The majority of the feedback received during the pre-application consultation period was from comments forms received following the online public exhibition. Feedback has also been received in the form of separate correspondence by email and telephone. A summary of issues and feedback raised, together with RES' response to each issue, can be found in Table 2. Redacted copies of the comments forms can be found in Appendix L.

Table 2

Issue/Concern Raised	RES Response to Issue/Concern		
Local Benefit Provide support to reduce energy bill to local residents	As we transition to a net-zero future, RES' priority is to deliver clean, green		

Would RES re-sponsor U16 camogie team

electricity at the lowest cost for consumers.

- Analysis on electricity generation costs published by BEIS has shown that onshore wind and large-scale solar PV are the cheapest electricity generating technologies available, benefitting all consumers.
- Carnbuck Wind Farm, if consented, would continue to build on the success of the renewable energy sector in Northern Ireland. The project is expected to deliver approximately £3.3 million of inward investment into the local area in the form of jobs, employment, and use of local services, providing a vital economic boost, creating skilled, sustainable jobs and helping to drive a cleaner and more resilient economy.
- Furthermore, if consented, Carnbuck Wind Farm would deliver around £12.52 million in business rates over its lifetime supporting vital local services for all local residents.
- RES firmly believe that our renewable energy schemes should also provide meaningful benefits locally and are inviting input from the local communities on their priority aims and projects in their area. We're looking for feedback to understand what projects could be supported directly. The type of projects envisaged are initiatives like fuel poverty schemes, improvements to local community facilities, further education and apprenticeship schemes or other priorities as determined by local action plans.

Roads

Fixing potholes, as and when they appear rather than waiting to the end of the project needs attention.

Times going pass the schools also needs addressed with the schools.

- Traffic and transport have been assessed in Chapter 12 of the ES. Whilst there will be a significant increase in HGV traffic on local roads during the construction period, a Traffic Management Plan (TMP) will be prepared by RES in consultation with the Dfl, the local PSNI and the local community with the aim of minimizing disruption as far as possible, including avoiding school pick-up/drop-off times etc.
- The TMP will include details about Video Surveying and Road Repairs. A video survey of the pre-construction condition of all public roads will be recorded around the site entrance and access routes to provide a baseline record of the state of the roads prior to construction work commencing. This will enable any repairs and maintenance work required to the relevant road due to any damage caused by the passing of heavy vehicles associated with the wind farm construction to be identified following the construction phase.
- The roads will be returned, at minimum, to the baseline condition at the end of the construction phase. Any damage caused by wind farm traffic during the construction period, which would be hazardous to public traffic, will be repaired immediately. These works will be carried out under permits with DfI Roads, as appropriate.

8. Website

During the exhibition the project specific website address was advertised on the banners. Prior to both exhibitions the web site address was included on leaflets sent to residential properties and community groups.

The website contains project information such as site location map proposed number of turbines, approximate capacity factor and number of houses the wind farm will serve. A 'Contact Us' page on

the website provides various ways which the public can get in touch should they want to comment or if they require further information in relation to the proposed project.

All of the information presented at the second public exhibition was also made available on the website along with a copy of the comments form. This allowed those who did not attend the public exhibition to view all the information and submit comments on the proposal. An image from the website is provided in Appendix M.

At all stages of the development process RES set out clearly the purpose of the consultation. Throughout the process RES also emphasised that comments made were not representations to the determining authority and that there would be the opportunity for representations to the determining authority once the planning application was submitted.

9. Summary

RES believes that consultation and effective communication is extremely important when developing a wind energy project.

Following the Statutory Requirements and Best Practice Guidance, RES has undertaken a consultation within the minimum 12-week consultation period. This PACC Report details the consultation activities undertaken and summarises, in section 5, the feedback received and our response.

RES has engaged proactively on the proposal in order to facilitate an early and constructive consultation process and used a variety of methods to communicate and engage with the local community, stakeholders and other interested parties in order to facilitate a strong public understanding of the potential impacts and benefits of the Development.

The valuable feedback received from the online public exhibition and recent January 2023 public exhibition has helped us gain a better understanding of the potential issues and concerns regarding Carnbuck Wind Farm as well as the support for the proposed layout. The online public exhibition feedback showed just under half (44%) of people who submitted comments forms, were happy with or neutral towards the proposed layout, and all people (100%) who submitted comments forms at the January 2023 public exhibition were happy with the proposed layout.

The feedback received from the online public exhibition showed that all respondents agreed or strongly agreed that we are facing a climate emergency, with 94% agreeing or strongly agreeing that generating electricity from renewable sources, and reducing our reliance on fossil fuels, can help towards tackling the pressing issue of climate change. All of the people who submitted comment forms at the January 2023 public exhibition strongly agreed that we are facing a climate emergency.

As an experienced wind farm developer, we have listened to the feedback from the local community and considered this in relation to the design of the project.

RES is committed to being a good neighbour and will build on the pre-planning consultation. The company has an 'open door' policy which means that anyone can contact the company about the Proposed Development at any stage and RES will respond in a timely manner. The Development Project Manager's and Community Relations Team's contact details have been made available for this purpose via exchange of information at briefings, the project newsletter and the project website.

The project website will be updated regularly to enable people to keep up to date with the latest news about the Development as it progresses.

Once the planning application and environmental statement have been validated by DFI Planning, RES will write out to political representatives, community organisations and members of the public who have requested to be kept informed, to provide them with the planning reference number and address of the DFI's Planning Department, should they wish to submit a formal representation.