



SID Section  
An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1,  
DV01 V902

**Our ref:** 210627  
**Your ref:** 315469

13<sup>th</sup> October 2023

**Re: Strategic Infrastructure Development (ABP Case Ref: 315469) – Renewable energy development including 8 no. wind turbines and associated infrastructure at Laurclavagh and surrounding townlands**

Dear Sir/Madam,

I refer to our previous Strategic Infrastructure Development ('SID') pre-application consultation meeting held in relation to the proposed wind farm development and all associated works at Laurclavagh (and surrounding townlands), Co. Galway on the 30<sup>th</sup> of January 2023. The forthcoming application will constitute permission for an 8 no. Turbine Wind Farm and all associated works (the "Proposed Development"). The pre-application consultation meeting and discussions have been based on a wind farm development which will have a generating capacity in excess of 50 megawatts (MW).

#### **Pre-application Consultation Review**

The pre-application consultation phase of the SID process was commenced in January 2023. To date, there has been one pre-application meeting carried out between An Bord Pleanála, the prospective applicant and their representatives (30<sup>th</sup> January, 2023). At the meeting the overall approach to the Proposed Development was discussed as was the progress and updates in relation to the various on-site studies that have been carried out. A 9 no. turbine layout was presented to the Board at the meeting. Further surveys and constraint analysis has led to the removal of 1 no. turbine (T09) from the proposed turbine layout. As such, the turbine layout has been updated since the meeting with the Board in January and the current 8 no. turbine layout is shown in Figure 2, enclosed with this letter.

An error in the scheduling of a separate pre-application consultation meeting led to a second meeting being held on the 22<sup>nd</sup> of September, however, once the error was understood the meeting was terminated.

#### **Formal Request to Issue SID Determination**

In light of the comprehensive studies that have been carried out and discussions that have taken place with the Board and other stakeholders in relation to the project to date, the prospective applicant now wishes to formally close the pre-application consultation process and requests that the Board issue a

notice containing its determination under the provisions of Section 37B(4) of the Planning and Development Act, 2000 (as amended) in relation to this case.

### Contents of Planning Application

For clarity, it is intended to include the following documentation with any future planning application for the Proposed Development:

- Required application forms, notices and cover letters etc.
- Environmental Impact Assessment Report ('EIAR')- assessing the following relevant criteria:
  - Population and Human Health,
  - Biodiversity,
  - Ornithology,
  - Land, Soils and Geology,
  - Hydrology and Hydrogeology,
  - Air Quality,
  - Climate,
  - Noise and Vibration,
  - Landscape and Visual,
  - Cultural Heritage,
  - Material Assets,
  - Vulnerability of the Project to Major Accidents and Natural Disasters,
  - Interaction of the Foregoing and,
  - An assessment of any potential cumulative effects.
- Natura Impact Statement ('NIS')
- Planning Drawings

### Development Description

The Proposed Development will constitute the provision of 8 no. wind turbines with a blade tip height of 185 metres. Each wind turbine will have a generating capacity of 6.25 MW of greater, resulting in a total generating capacity of above 50MW (the current model being assessed has a generating capacity of 7MW, which would yield a total of 56MW). The Proposed Wind Farm will connect to the existing 110kV Cloon Substation in Co. Galway, via an underground grid connection cable from a proposed onsite 110kV substation, all of which will be subject to a separate Section 182A application (Case Ref. 317625).

The main characteristics of the Proposed Development are set out in the attached layout and location plan and are summarised below:

- The provision of 8 no. wind turbines with a tip height of 185m, hub height of 103.5m and rotor diameter of 163m currently being assessed. The proposed turbines to be accommodated on site will have a combined generating capacity of above 50MW.
- 1 No. meteorological mast of a height of 30m;
- 1 No. temporary construction compound;
- Provision of new internal roads and upgrade of existing site roads;
- All supporting infrastructure and works.

The site of the proposed wind farm includes lands in the townlands of Laurclavagh, Cahermorris, Bunnavevelly More, Kilcurriv Eighter, Pollacossaun Eighter, Cluidrevagh, Kilcurrivard, Ballynacreg North and Pollacossaun Oughter, Co. Galway.

### **SID Determination Criteria**

In order to be considered as Strategic Infrastructure Development any project must exceed the thresholds established in the 7th Schedule of the Planning and Development Act, 2000 (as amended) and also satisfy one or more of the three criteria set out in Section 37A(2).

The relevant SID threshold established in the 7th schedule of the Planning and Development Act, 2000 (as amended) (the “Act”) for the current project is *“An installation for the harnessing of wind power for energy production (a wind farm) with more than 25 turbines or having a total output greater than 50MW”*. The Proposed Development will have 8 turbines which will have a generating capacity in excess of 50MW. The proposal will therefore exceed the generating capacity threshold specified in the 7th schedule.

Under the Section 37A(2) of the Act the project must satisfy one or more of the following criteria:

- a) The development would be of strategic economic or social importance to the State or the region in which it would be situate,
- b) The development would contribute substantially to the fulfilment of any of the objectives in the National Planning Framework or in any regional spatial and economic strategy in force in respect of the area or area in which it would be situate,
- c) The development would have a significant effect on the area of more than one planning authority.

The consideration of the project in the context of these criteria is set out below:

**1. The development must be of strategic economic or social importance to the State or the Region in which it would be situate;**

Due to the scale of the project - with an installed capacity in excess of 50MW of renewable energy - it is considered to be wholly of a strategic nature and of strategic economic and social importance to the region and state. The capital investment required for the construction of a project of the scale proposed, when combined with the commercial rates, contributions and community gain proposals associated with the operation of the Proposed Development, it will cumulatively represent a significant economic contribution to the region if not the country as a whole. The Proposed Development will generate a large quantity of electricity to contribute to Ireland’s renewable energy generation and carbon saving targets as set out at national level. As a renewable energy proposal, the project will assist in meeting national renewable energy targets and will also result in significant reductions in carbon emissions from electricity generation and reduce the country’s reliance on imported fossil fuels.

**2. The development would contribute substantially to the fulfilment of any of the objectives in the National Planning Framework or in any regional spatial and economic strategy in force in respect of the area in which it would be situate;**

National Planning Framework:

The Proposed Development will contribute to the fulfilment of the transition to a low carbon and climate resilient society strategic outcome (National Strategic Outcome 8), which states *that “New energy systems and transmission grids will be necessary for a more distributed, renewables focuses energy generating system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy to the major sources of demand.”*

As part of this National Strategic outcome the following targets are noted in relation to Green Energy-

*“Deliver 40% of our electricity needs from renewable sources by 2020 with a strategic aim to increase renewable deployment in line with EU targets and national policy objectives out to 2030 and beyond. It is expected that this increase in renewable deployment will lead to a greater diversity of renewable technologies in the mix.”*

With specific focus on the Northern and Western Region within which the current project is located, the NPF further states:

*“Harnessing the potential of the region in renewable energy terms across the technological spectrum from wind and solar to biomass and wave energy”.*

The Proposed Development is also in accordance with and will contribute to the fulfilment of National Policy Objective 55:

*“Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050”.*

#### Regional Spatial and Economic Strategy

The importance of renewable energy is also recognised within the Northern and Western Regional Authority’s (NWRA) Regional Spatial and Economic Strategy (RSES). The RSES set out a number of ‘Growth Ambitions’ relating to a Low Carbon Future. This ambition states that:

*“It has been identified that more strategic actions are required to prepare the region for what is to come and highlights the need to create a combined long term vision for the future of both energy supply and our ability to use **renewable energy**. To address our energy requirements our RSES emphasises the need for coordination, new thinking, investment and skills to implement change. All considerations need to be cognisant of our natural resources, landscape and heritage (natural, social and cultural).”*

The RSES goes on to note that “*moving away from fossil fuels towards a greener and low carbon society*” is one of multiple requirements needed to ensure the continued success for the region. The promotion of renewable energy is identified as a solution to reducing the region’s carbon footprint.

The RSES supports the provision of renewable energy sources in the region, as indicated in Policies RPO 4.17 and 4.18.

#### Policy RPO 4.17

*“To position the region to avail of the emerging global market in renewable energy by:*

- *Stimulating the development and deployment of the most advantageous renewable energy systems*
- *Supporting research and innovation*

- *Encouraging skills development and transferability*
- *Raising awareness and public understanding of renewable energy and encourage market opportunities for the renewable energy industry to promote the development and growth of renewable energy businesses*
- *Encourage the development of the transmission and distribution grids to facilitate the development of renewable energy projects and the effective utilisation of the energy generated from renewable sources having regard to the future potential of the region over the lifetime of the Strategy and beyond.”*

Policy RPO 4.18:

*“Support the development of secure, reliable and safe supplies of renewable energy, to maximise their value, maintain the inward investment, support indigenous industry and create jobs.”*

The proposal will contribute to increasing the levels of renewable energy supply in a manner consistent with the sustainable development of the region.

The RSES also recognises that the development of renewable energy represents a key growth enabler for the region (Section 4.4 of the RSES refers). The RSES notes that *“energy is needed for economic growth, and access to affordable and reliable energy is an essential development objective. Historically most incremental energy demand has been met through fossil fuels, however in future that energy will have to be low carbon and ultimately zero-carbon. Decarbonisation can and needs to happen and it is an objective of the NPF that Ireland becomes a Low Carbon Economy by 2050”*.

This will require additional energy to be supplied from indigenous renewable sources which is identified in the RSES as an opportunity for the region. The RSES clearly supports the decarbonising of the energy sector and towards this end the strategy states:

*“The region has a huge potential for growth in renewables, with its diverse and growing environmental goods and services sector, and not least because of the proactivity and drive with which it embraces this agenda. Demonstrating its commitment through the support of test sites, innovative green policies and investing in infrastructure to support a low carbon future. To achieve this, policies must encourage:*

- *Practices to reduce the production of CO<sub>2</sub>.*
- *Increase in our energy security.*
- *Reduced cost of electrical power for domestic purposes, and regional development of value adding of primary production.*
- *Increased industry development of modern high-efficiency building materials.*
- *Increased efficiency in the development of renewable energy production.*
- *Improved efficiency of freight and passenger transport systems”.*

The Strategy also supports the provision of ancillary electrical infrastructure which facilitates the increased penetration of renewable energy onto the national grid, RPO’s 8.1, 8.2, 8.3, 8.4 refer.

Accordingly, the development as proposed will contribute substantially to the fulfilment of objectives within the NPF and RSES which are currently in place, and fully satisfies the criteria set out in Section 37A(2)(b) of the Act.

**3. The development would have a significant effect on the area of more than one planning authority.**

The third criterion set out in section 37A(2) of the Act, that the development would have a “*significant effect*” on the area of more than one Planning Authority is not considered relevant in the context of the current proposal as the proposed wind turbines and proposed grid connection infrastructure are both located entirely within the functional area of Galway County Council.

As the Proposed Development exceeds the relevant thresholds set out in the 7th Schedule and satisfies criteria set out in section 37A(2) of the Planning and Development Act 2000, (as amended) it is contended that the project does constitute Strategic Infrastructure Development, as such we look forward to the determination of the Board in this regard.

We trust the above is in order and look forward to receiving the Board’s determination of this case as soon as possible.



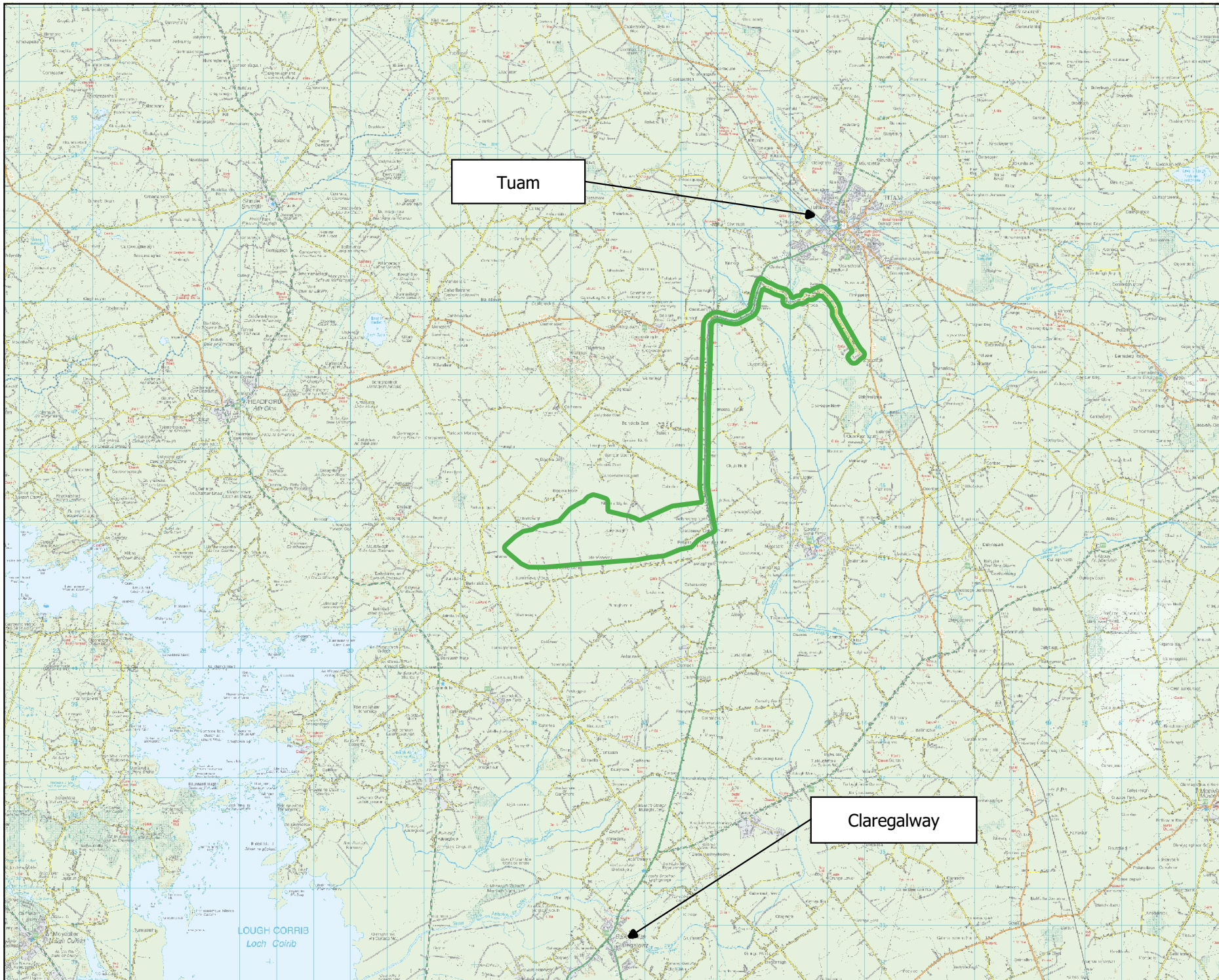
**Ronan Dunne,**

**Planner,**


**MKO.**

**Enclosed**

- > Site Location Map (Scale: 1:135,000 @ A3)
- > Site Layout Map (Scale: 1:30,000@ A3)



Map Legend

 EIAR Site Boundary



Drawing Title

Site Location

Project Title

Proposed Laurclavagh Renewable Energy Development

Drawn By  
NMCh

Checked By  
OM

Project No.  
210627

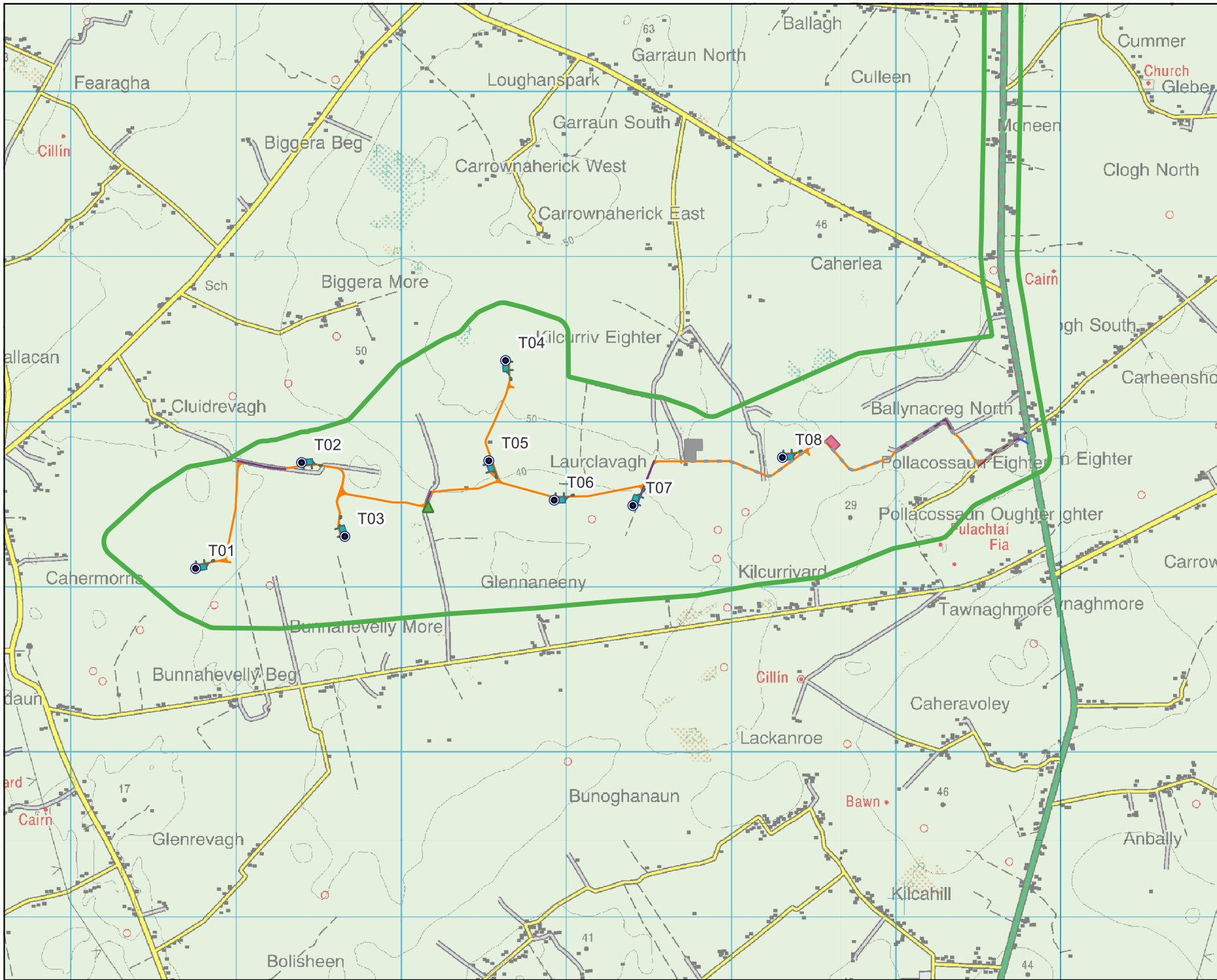
Drawing No.  
Figure 1

Scale  
1:135,000

Date  
13.10.2023



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- ### Map Legend
- EIAR Site Boundary
  - Proposed Turbine Locations
  - Proposed Hardstands
  - Met Mast Location
  - Temporary Construction Compound
  - Proposed New Roads
  - Existing Roads for Upgrade
  - Temporary Road
  - S182 Infrastructure



Drawing Title	
<b>Wind Farm Site Layout</b>	
Project Title	
Proposed Laurclavagh Renewable Energy Development	
Drawn By	Checked By
<b>NMCh</b>	<b>OM</b>
Project No.	Drawing No.
<b>210627</b>	<b>Figure 2</b>
Scale	Date
1:30,000	13.10.2023

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