

Attn: Kieran Somers,  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1

Executive Officer  
LTR-DATED  
PL

28<sup>th</sup> June 2016

Our Ref: 150504  
Your Ref: 07.PC0209

**Re: Proposed Wind Farm at Cloncreen, Co. Offaly,  
Strategic Infrastructure Development (SID) Determination**

Dear Mr. Somers,

I refer to the previous meetings held in relation to the pre-planning consultation stage of the Strategic Infrastructure Determination (SID) process for the proposed wind farm development at Cloncreen, Co. Offaly.

**Minutes of Last Meeting**

We have received the minutes that issued from the Board in relation to our last meeting which took place on the 18<sup>th</sup> of May, 2016. We acknowledge the contents of the minutes, and would make the following comments in relation to matters referenced.

- On page 4 of 9, the third paragraph states *"The revised scoping documentation was issued..."*, please note that it was not a revised scoping document that was issued in April 2016 but a revised layout.
- On page 5 of 9, first paragraph (second sentence) states, *"It said the closest residential dwelling not involved in the development to a turbine is 750 metres"*. However, there are no dwellings involved in the development. A more accurate reflection would be to state that the closest occupied residential dwelling to a turbine is at a distance of 750 metres.
- Page 6 of 9, fourth paragraph we assume that there is a typographical error where in the last line "really" is stated instead of "ready".

**Pre-Application Consultation Review**

There have now been two meetings held with the Board since the pre-application consultation process was opened in October 2015. These meetings were held on the 18<sup>th</sup> of November 2015 and 18<sup>th</sup> of May 2016. All details of the various meetings and format of the proposed development have been fully discussed with the relevant stakeholders and parties and the details of the proposed development have been set out in full within the meetings that have been held, as detailed in the minutes issued by An Bord Pleanála.

**Formal Request to Issue SID Determination**

At the last meeting the design team and An Bord Pleanála confirmed that it was not necessary (nor was it intended) to have any further pre-application consultation meetings in relation to the project and that the applicant would close the pre-application consultation phase when it determined it was ready to lodge the Planning Application. The prospective applicant is now in a position to lodge a planning application and is finalising the documentation required in support of the proposal.

AND BY  
TIME 30 JUN 2016  
LTR-DATED FROM

PL Therefore the prospective applicant now wishes to formally close the pre-application consultation process and request that the Board carry out its Strategic Infrastructure Development determination under the provisions of Section 37B(4) of the Planning and Development Act, 2000, as amended on the basis of the 21 turbine layout presented to the Board at the last pre-application consultation meeting.

### SID Determination Criteria

In order to be considered as Strategic Infrastructure Development, any project must satisfy the thresholds established in the 7<sup>th</sup> 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 threshold established in the 7<sup>th</sup> Schedule 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 power output greater than 50MW". The proposed development has now been confirmed as having 21 turbines and will therefore have a minimum power output of at least 63MW. The proposal therefore exceeds generating capacity thresholds specified in the 7<sup>th</sup> Schedule for wind power developments.

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

1. The development must be of strategic economic or social importance to the State or the Region in which it would be situate;
2. The development would contribute substantially to the fulfillment of any of the objectives in the National Spatial Strategy or in any regional planning guidelines in force in respect of the area in which it would be situate;
3. 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 proposal the project is of strategic economic and social importance to the region and the state. The capital investment required for a project of the scale proposed, when combined with the commercial rates, development contributions, community gain proposals, and infrastructure improvements associated with the operation of the proposed development, will cumulatively represent a significant economic contribution to the Region and the State as a whole.

The proposed development represents a capital investment of approximately €110 Million to construct the project, which on its own represents a significant investment in this area and region.

The project will therefore 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 fulfillment of any of the objectives in the National Spatial Strategy or in any regional planning guidelines in force in respect of the area in which it would be situate;**

The proposed development is in accordance with the promotion of sustainable energy development as set out in provisions of Delivering a Sustainable Energy Future for Ireland

2008 – 2020, The National Climate Change Strategy, ~~Related Development~~ Plan and Strategy for Renewable Energy 2012 – 2020. The proposal will significantly contribute towards meeting sustainable energy targets and ~~objectives at County, Regional and National level.~~

The Regional Planning Guidelines for the Midland Region 2010-2022 (RPGs) list the promotion of the delivery of renewable energy particularly in the context of the existing energy infrastructure in the region as one of its 13 Strategic Goals. The RPGs recognise the opportunity and potential for the region to harness renewable energy development arising from the presence of cutaway bogs. The RPGs acknowledge that the peatlands and associated cutaway have potential to *“accommodate large scale energy production in the form of wind farms and bioenergy”*. In this regard Section 3.3.4.6 of the guidelines state the following:

*“Worked out peatland areas, offer potential for renewable energy installations including wind energy. With a strong history of energy production and an extensive electricity transmission network in place, the potential exists for a smooth transition to renewable energy from fossil fuels. This opportunity can result in related employment opportunities in manufacturing, servicing and research and development activities.”*

Section 3.4.6.1 of the RPGs goes on to state:

*“The RPGs support the development of wind energy generation throughout the region, subject to appropriate siting considerations as set out in the Wind Energy Development Guidelines, DoEHLG (2006), Local Authority Wind Strategies and compliance with environmental and landscape designations. The development of the renewable energy sector in the Midland Region will significantly contribute to the national target of generating 40% electricity from renewable sources by 2020.”*

Policy TIP 33 of the Guidelines is also supportive of the provision of renewable energy infrastructure it states the following:

*“TIP33: Support the sustainable development of the infrastructure required to assist the Midland Region in the delivery of renewable energy particularly in the context of the existing energy infrastructure in the region and the need to make a transition from peat to renewable energy.”*

The relevant RPGs are therefore extremely supportive of renewable energy and of meeting national policy targets. The proposed development will contribute to the fulfillment of objectives stated in the regional guidelines and furthermore is compliant with the provisions of the Offaly County Development Plan, under which the location of the site is subject to designation as an *“Area Suitable for Wind Energy Development”*.


**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 Planning and Development Act 2000 (as amended) is not considered a significant/relevant factor in the context of the current proposal.

As the proposed development exceeds the relevant threshold set out in the 7<sup>th</sup> Schedule for the generation of wind energy and satisfies two of the three 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 at its earliest convenience.

Yours sincerely,



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J. Green, B.A., M.R.U.P., M.I.P.I.  
McCarthy Keville O'Sullivan

AN BORD PLEANÁLA  
TIME \_\_\_\_\_ BY \_\_\_\_\_  
30 JUN 2016  
LTR-DATED \_\_\_\_\_ FROM \_\_\_\_\_  
PL \_\_\_\_\_