

Attn: Kieran Somers, Executive Officer  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
DV01 V902

30<sup>th</sup> January 2017

Our Ref: 160815  
Your Ref: 07.PC0227

**Re: Proposed Wind Farm at Ardderroo, near Rosscahill, Co. Galway -  
Strategic Infrastructure Development (SID) Determination**

Dear Mr. Somers,

I refer to our previous Strategic Infrastructure Development (SID) pre-application consultation meeting held in relation to the proposed wind farm development at Ardderroo, near Rosscahill, Co. Galway on the 4<sup>th</sup> October 2016.

**Minutes of Last Meeting**

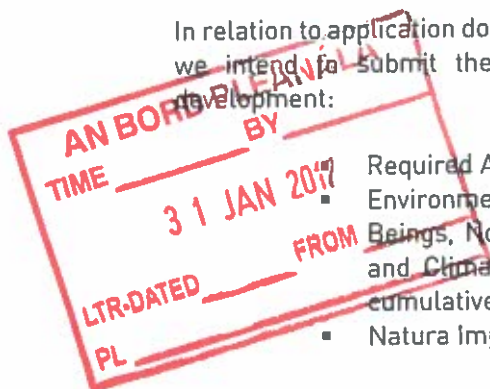
On behalf of our clients, Ardderroo Windfarm Limited, we wish to acknowledge receipt of the written record of the pre-application consultation meeting held in relation to this project on the 4<sup>th</sup> of October, 2016. We acknowledge the contents of the minutes and wish to make the following clarification:

- The fourth paragraph on page 5 could be misconstrued as the applicant seeking to adhere to the requirements of the Scottish Natural Heritage (SNH) guidance in all aspects of the prospective project. To clarify, the applicant is intending to adhere to the requirements of SNH guidance regarding ornithological assessment as discussed. This position is guided by recent decisions given by the Board whereby SNH guidance in respect of these assessment criteria has been the principle guidance in its assessment of recent wind farm development proposals.

**Pre-Application Consultation Review**

The Board will be aware that the applicants wish to progress an application for the proposed Ardderroo Wind Farm and we note that the Board suggested that a further meeting with the Board would not be required unless the prospective applicant requested it. As noted by the Board, the current project team has undertaken the SID application process with the Board previously for the development of a wind farm at this location and are therefore familiar with the relevant procedures. Accordingly, it is the applicant's preference to receive any further instruction in relation to procedures in writing [thus avoiding the need for a further meeting in the interests of expediting the application process].

In relation to application documentation, similar to the previous SID application on this site (PA0036) we intend to submit the following with any future planning application for the proposed development:



- Required Application forms, notices and drawings etc.;
- Environmental Impact Statement (EIS) – assessing all the relevant criteria (Human Beings, Noise, landscape, Noise, Flora and Fauna, Geology/Soils, Hydrology, Air and Climate, Cultural Heritage etc.) including an assessment of any potential cumulative effects, and
- Natura Impact Statement (NIS).

As advised by the Board in our previous pre-determination meeting, the project team have engaged with of the National Parks and Wildlife Service (NPWS), and with other prescribed bodies, including the Planning Authority, and interested parties in respect of the content and scope of the Environmental Impact Statement (EIS) and design of the proposed development.

#### **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, the prospective applicant now wishes to formally close the pre-application consultation process and request that the Board carry out its determination under the provisions of Section 37B(4) of the Planning and Development Act, 2000, as amended.

As presented in our previous discussions with the Board (and similar to the previous application considered under PA0036), the proposed development represents a wind farm scheme comprising of 29 no. turbines, 1 no. 110kV substation, 1 no. permanent meteorological mast and ancillary infrastructure. The enclosed Figure 1 illustrates the site layout of the proposed development and the study area boundary of its prospective EIS.

We wish to draw the Board's attention to the following updates that have be incorporated within the proposed development and which would differ from the proposal that was previously considered by the Board under PA0036 (these are highlighted and numbered in Figure 1). In this regard please note:

1. New location of turbine T1 has been provided and access to this turbine is provided from the east rather from south. This Turbine has moved approximately 470 metres northeast of previously proposed location to avoid a new NetShare telecom link that has been provided since the previous application was lodged.
2. Borrow Pit No. 1 has been reduced in size.
3. Two borrow pits have been added to the layout (between the locations of T19 and T20)
4. A new road link and watercourse crossing is being provided in the southern portion of the site to facilitate access and construction.
5. An alternative location for a temporary construction compound is being provided in the southern portion of the site.
6. Meteorological mast re-location.

#### **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 29 turbines and will therefore have a minimum output of 65 MW. The proposal therefore exceeds both the turbine number and generating capacity thresholds specified in the 7<sup>th</sup> Schedule.

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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 western region and the state. The capital investment required for a project of the scale proposed, when combined with the commercial rates, 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 in excess of €110 million to construct the project, which on its own represents a significant investment in this area and region. The generating capacity of the proposed development constitutes in excess of 20% of the total West Galway target capacity under Gate 3. County Galway's Gate 3 allocation represents 11% of the national Gate 3 target.

The proposed wind farm has the potential to generate equivalent electricity to cater for over 40,000 average households or in excess of 65% of households in County Galway. Accordingly the proposal is of strategic economic and social importance to the State 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, National 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 West Regional Planning Guidelines 2010-2022 (RPGs) refer to giving effect at regional level to national policies and that renewable and sustainable energy lie at the heart of the Government's environmental and

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economic policies. The RPGs also acknowledge that the West Region is particularly well-placed to assist in achieving these policies with a wide range of renewable energy generating resources including wind power.

Section 5.5 of the RPGs on Energy and Utilities states that securing indigenous renewable energy supplies within the West Region will generate a more sustainable economy, lower carbon emissions, combat climate change and help meet national Government and EU renewable targets. With regards to wind energy, the RPGs state:

*"The West Region contains Ireland's premier wind resource and holds the potential for the region to become a sustainable exporter of renewable energy."*

The West Region has a significant wind resource although the RPGs acknowledge that improvements are required to the existing electricity network. The RPGs includes the following specific objective in relation to wind energy, IO54 which supports the sustainable development of wind energy schemes through the initiation of a Regional policy on wind farm location.

The 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 County Galway Wind Energy Strategy, under which the subject site is subject to two designations. The majority of the site has been designated as a "Strategic Area" where wind farm development is most favoured, while the remainder of the site is designated as "Open to Consideration", which are areas considered to hold potential for wind farm 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), that the development would have a significant impact on the area of more than one Planning Authority is not considered relevant in the context of the current proposal.

As the proposed development exceeds the relevant thresholds set out in the 7<sup>th</sup> Schedule 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.

We trust the above is in order and look forward to hearing from the Board further in due course.











Yours sincerely,



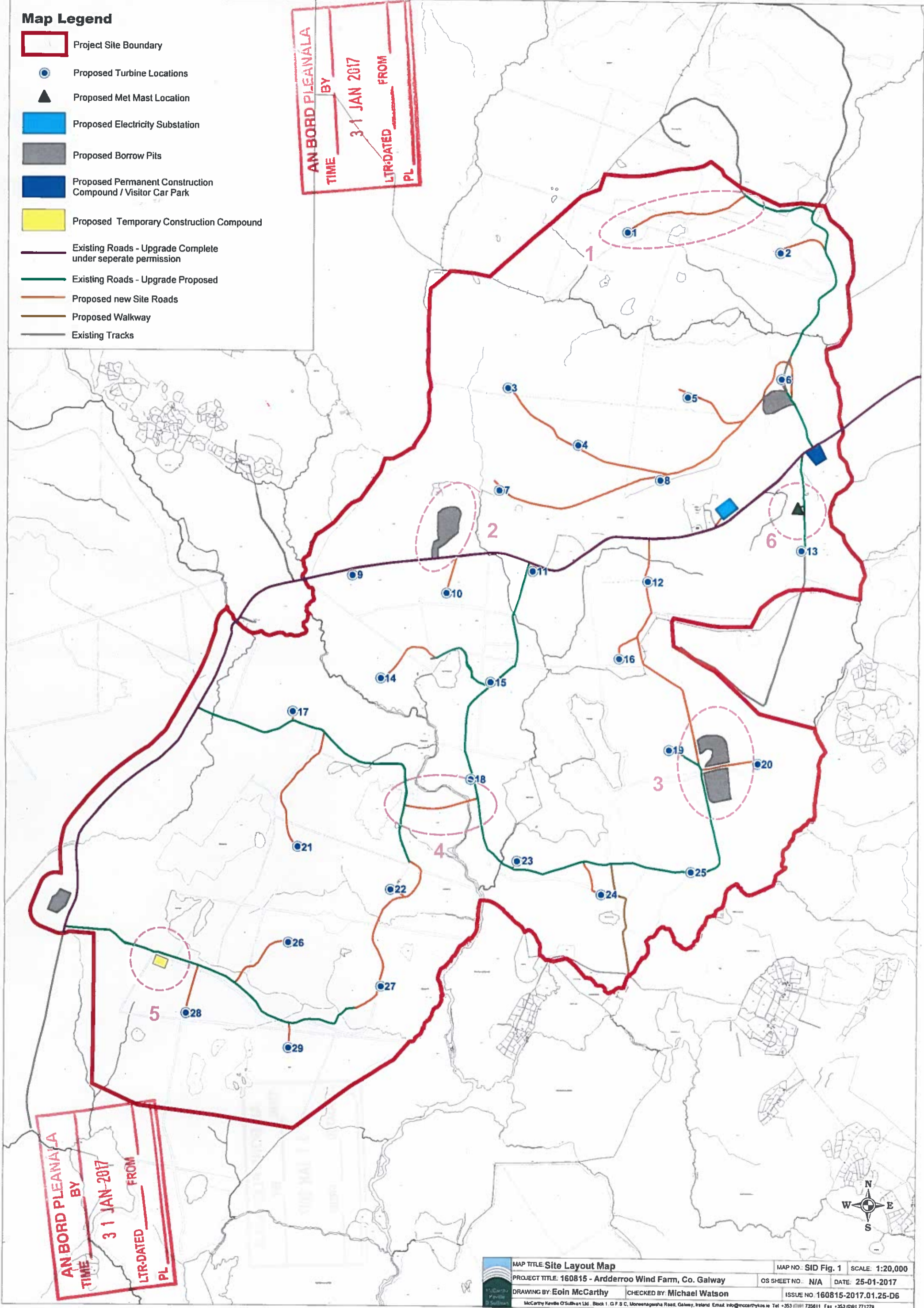
J. Green, B.A., M.R.U.P. MIPI  
Senior Planner  
McCarthy Keville O'Sullivan Ltd.

Encl. Figure 1: EIS Study Area and Layout of Proposed Ardderroo Wind Farm.

**Map Legend**

-  Project Site Boundary
-  Proposed Turbine Locations
-  Proposed Met Mast Location
-  Proposed Electricity Substation
-  Proposed Borrow Pits
-  Proposed Permanent Construction Compound / Visitor Car Park
-  Proposed Temporary Construction Compound
-  Existing Roads - Upgrade Complete under separate permission
-  Existing Roads - Upgrade Proposed
-  Proposed new Site Roads
-  Proposed Walkway
-  Existing Tracks

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MAP TITLE: Site Layout Map	MAP NO.: SID Fig. 1	SCALE: 1:20,000
PROJECT TITLE: 160815 - Ardderroe Wind Farm, Co. Galway	OS SHEET NO.: N/A	DATE: 25-01-2017
DRAWING BY: Eoin McCarthy	CHECKED BY: Michael Watson	ISSUE NO: 160815-2017.01.25-D6
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