



An
Bord
Pleanála

Inspector's Report

14.PC0233

Type of Application	SID Pre-application consultation – whether project is or is not strategic infrastructure development.
Proposed Development	Wind farm development and associated works.
Location	Various Townlands in South County Longford
Applicant	Bord na Mona Powergen Limited.
Planning Authority	Longford County Council
Meetings held	17 th Nov 2016, 29 th May 2017 and 17 th May 2018
Inspector	Una Crosse

1.0 Proposed Development and Background

- 1.1. The proposed development comprises the construction and operation of a wind farm on a site within the administrative area of County Longford but in close proximity to the River Shannon and administrative boundary of Roscommon County Council. The site comprises three cutover bogs known as Derryaroge, the most northerly Derryadd in the centre of the three and Lough Bannow, the most southerly with an area of approximately 2,300 hectares. The area is approximately 12km in length and 4km wide. The bogs are traversed by internal rail lines which run generally in a north south and east west direction within and through the bogs. The site is located to the south of and within 300m of the River Shannon which flows to the northwest and north of the most northerly bog Derryaroge. The R392 is located to the west and south west of the bogs with the N63 traversing the two upper bogs Derryaroge and Derryadd. The R398 traverses the Derryadd and Lough Bannow bogs. The most proximate urban areas are Lanesborough to the west of Derryaroge bog, Killashee to the east of Derryaroge and Derryadd and Keenagh to the southeast of Lough Bannow bog. It is noted that the bogs remain active in respect of peat extraction with existing wind monitoring masts at Derryaroge and Lough Bannow bogs.
- 1.2. The proposal as originally submitted proposed the development of 29 turbines with an output of c. 90MW with a maximum height to tip of blade of 170m. The layout as originally proposed included turbines 1-8 (8) within the southern Lough Bannow bog, turbines 9-18 (10) within the central Derryadd Bog and turbines 19-29 (11) in the northern Derryaroge bog. Associated works proposed include hardstanding at each turbine, upgrading of existing access routes and construction of new access routes, upgrading of existing drainage system, borrow pits, substation and cables.
- 1.3. During the pre-application process the proposed scheme was amended such that the current proposal submitted to the Board at the final pre-application consultation meeting comprised the following:
- 24 turbines with a power output of approximately 90-96MW and a maximum tip height of 185m.
 - The turbines are proposed with 1-9 (9) in the northern Derryaroge bog, turbines 10-17 (7) within the central Derryadd Bog and turbines 18-24 (7) within the southern Lough Bannow bog.

- Two potential substation locations have been indicated which are located at the north and south of the central Derryadd bog with one location to be developed;
- Borrow pits, 3 meteorological masts in addition to the two existing masts and construction compounds;
- Proposed haul routes and cycle/walkways within the site and associated works.

1.4. The prospective applicant has undertaken work on the preparation of an EIAR. Discussions have been initiated with the planning authority (Longford County Council) as well as the adjoining local authorities of Roscommon and Westmeath County Councils. With respect to the National Parks and Wildlife Services (NPWS), the prospective applicant stated that a scoping document has been forwarded but a formal meeting had not yet been arranged. Public consultation has been undertaken commencing in January 2016.

2.0 Applicant's Case

2.1.1. The key elements of the prospective applicant's submission in support of the case being designated as strategic infrastructure are summarised as follows (the signed records for the pre-application consultation meetings held on 17th Nov 2016, 29th May 2017 and 17th May 2018 should be consulted for further details):

- Proposal would comprise the first wind farm in County Longford and would be one of the largest in the country. The capital investment required for a project of this scale represents a significant economic contribution to the Region and the State. The proposal will assist in meeting national renewable energy targets and will result in significant reductions in carbon emissions from electricity generation and reduce reliance on imported fossil fuels.
- National Spatial Strategy (now superseded by NPF) refers to a 'need for significant additional generating capacity aiming to ensure that resources are used in sustainable ways that put as much emphasis as possible on their renewability. As a renewable form of electricity generation the proposal will assist in achieving these objectives.
- Midland Regional Planning Guidelines (July 2010) include an objective to 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 (policy TIPP 33) with the proposal according with this objective with the site currently used for peat extraction to power the nearby Lanesborough power station for electricity generation. The proposal would see the use of the site replaced with one associated with electricity generation from wind energy assisting the policy to transition from peat to renewable.

- The site is located within the administrative area of Longford County Council but at western extremity comes close to the county boundary with Roscommon defined by the River Shannon with the potential for the project to impact upon the area of Roscommon with regard to visual impact and construction related traffic.
- The proposal complies with the Longford County Development Plan 2015-2021 with the majority of the site located within a preferred area for wind energy development.

3.0 Legal Provisions

- 3.1. The pre-application consultation relates to the proposed 24 turbine wind farm, including the construction of a substation and associated works. The Board is to determine whether the proposal is or is not Strategic Infrastructure Development as defined by section 37A of the Planning and Development Act 2000, as amended by section 5 of the Planning and Development (Strategic Infrastructure) Act 2006 and by section 78 of the Planning and Development (Amendment) Act 2010. The Seventh Schedule of the 2006 Act provides that the following shall be infrastructure development for the purposes of sections 37A and 37B:

'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 50 megawatts.'

- 3.2. Section 37A(1) states that an application for permission for any development specified in the Seventh Schedule shall, if the following condition is satisfied, be made to the Board under section 37E and not to a planning authority. Section 37A(2) states:

That condition is that, following consultation under section 37B, the Board serves on the prospective applicant a notice in writing that, in the opinion of the Board, the proposed development would, if carried out, fall within one or more of the following paragraphs, namely –

- (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 Spatial Strategy or in any regional planning guidelines in respect of the area or areas in which it would be situate,*
- (c) the development would have a significant effect on the area of more than one planning authority.*

4.0 Assessment

4.1. Compliance with the Seventh Schedule

- 4.1.1. Having regard to the nature and scale of the proposed facility comprising a total of 24 no. turbines and having a total power output of c. 90-96 MW, it is my opinion that the proposed development comes within the scope of class 1 of the Seventh Schedule of the Strategic Infrastructure Act, 2006 (as amended) being a wind farm having a total output greater than 50 megawatts.

4.2. Section 37A(2)(a) - Strategic Economic or Social Importance to the State or the Region

- 4.2.1. The prospective applicant submits that the proposal will assist in meeting national renewable energy targets and will result in significant reductions in carbon emissions from electricity generation. I consider that the construction impact of the development in terms of employment and economic activity would likely be significant at a regional level. In addition to economic activity related to employment creation, the proposed development has the potential to have a significant impact in meeting the State's renewable energy targets. I also note that the development would be one of the most significant energy projects to be developed in the region. The development is therefore considered to come within the scope of section 37A(2)(a) of the Act.

4.3. **Section 37A(2)(b) – Contribution to the achievement of the objectives of the NSS or RPGs**

Both the National Spatial Strategy (now superseded by the National Planning Framework) and the Midland Regional Planning Guidelines have objectives in favour of development to generate energy from renewable sources which refer to the use of cutaway bogs for wind energy development. The proposed development could contribute substantially to the fulfilment of those objectives within the meaning of 37A(2)(b) of the planning act. It is my opinion that proposal would come within the scope of section 37A(2)(b) of the Act.

4.4. **Section 37A(2)(c) – Significant effect on the area of more than one Planning Authority**

- 4.4.1. While the application site itself is located entirely within the administrative boundary of Longford County Council, given the proximity to the boundary with Roscommon County Council (c.2km from closest turbine) and the potential visual impact on same, there is the potential that the proposed development could have significant effects, either direct or indirect, on the area of Roscommon County Council. While the haul routes may effect both Roscommon and Westmeath County Councils the potential effect would not in my opinion be significant given the temporary nature of same. However, it is my opinion that proposal would come within the scope of section 37A(2)(c) of the Act.

5.0 **Conclusion**

- 5.1. On the basis of the above, it is my opinion that the proposed development would exceed the threshold set out in the Seventh Schedule of the Strategic Infrastructure Act, 2006, as amended by the Planning and Development (Amendment) Act, 2010 as, with the development of 24 no. turbines with a power output of c.90-96 MW it would have a power output in excess of the 50MW specified. It is also my opinion that the development falls within the parameters of sections 37A(2)(a), (b) and (c) of the Planning and Development Act 2000 as amended by the SI Act, 2006.

6.0 Recommendation

- 6.1. In view of the above, it is therefore recommended that the Board determine that the development in question constitutes strategic infrastructure development as defined by section 2(1) of the Planning and Development Act 2000, as amended by section 6 of the Planning and Development (Strategic Infrastructure) Act 2006 and that the prospective applicant be informed accordingly.

Una Crosse

Senior Planning Inspector

June 2018

PRESCRIBED BODIES

The following is a schedule of prescribed bodies considered relevant for the purposes of section 37E(3)(c) of the Principal Act:

- The Minister for Housing, Planning, Community and Local Government.
- Longford County Council
- Roscommon County Council
- Westmeath County Council
- The Minister for Arts, Heritage, Regional, Rural and Gaeltacht Affairs
- The Minister for Communications, Energy and Natural Resources
- Transport Infrastructure Ireland
- An Comhairle Ealaíon
- Fáilte Ireland
- An Taisce
- Inland Fisheries Ireland
- Waterways Ireland
- The Irish Aviation Authority
- The Heritage Council
- The Health Service Executive
- The Commission for Energy Regulation
- The Minister of Transport, Tourism and Sport
- The Environmental Protection Agency
- The Minister for Agriculture, Food and the Marine
- Irish Water