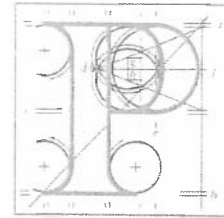


No 1

**Our Case Number:** ABP-319023-24



An  
Bord  
Pleanála

Liam Quinn  
Ballteige Little  
Ballycommon  
Tullamore  
Co. Offaly  
R35 C5C9



**Date:** 08 April 2024

**Re:** Combined Cycle Gas Turbine and Open Cycle Gas Turbine Thermal Power Plant, Electricity Grid Connection including 2 no. substations, and associated buildings, plant, site works, service and ancillary development on land within the townlands Knockdrin, Derrygreenagh, Derryarkin, Derryiron, Ballybeg, Coolcor, Barrysbrook, Clonin, Togher and Coole, Co. Offaly. ([www.derrygreenaghpowerplanning.ie](http://www.derrygreenaghpowerplanning.ie))

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Ellen Moss  
Executive Officer  
Direct Line: 01-8737285

PA04

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

# Derrygreenagh Power Submission



**Cllr Liam Quinn**

**Offaly County Council  
Edenderry Municipal District**

## **Application Details**

**File No:**  
319023 (SID Application)

**Applicant**  
Board na Mona  
(Derrygreenagh Power)

**Description**  
Combined Cycle Gas Turbine and Open Cycle Gas Turbine Thermal Power Plant, Electricity Grid Connection including 2 no. substations, and associated buildings, plant, site works, service and ancillary development.

**Development Address**  
Lands within the townlands Knockdrin, Derrygreenagh, Derryarkin, Derryiron, Ballybeg, Coolcor, Barrysbrook, Clonin, Togher and Coole, Co. Offaly.

**Relevant Local Authority**  
Offaly County Council

To whom it may concern,

I wish to make the following submission on the file named above:

**Executive Summary of Submission**

1. The cabling connecting this development to the substation be located **entirely underground** with **no overhead wires/pylons permitted**.
2. A **pavement/structural survey of the R400 and L1010** be carried out and works completed in advance of any construction taking place.
3. The **R400 at Derrygreenagh Hill be widened and upgraded**.
4. The L1010 (Rhode Village – Taylors Cross) be widened where feasible and **overlaid with a new road surface in advance of construction works**.
5. A condition be placed on the applicant to construct a **Footpath from Priory Lawns to the Football Field** before construction commences.
6. The proposed **Community Benefit Fund be index linked** to output as is currently best practice for Wind/Solar developments under the current RESS Guidelines. (Currently €2/MWh)
7. Houses **located within 1km of the development boundary**, and not just the Power Plant site be included in a “Near Neighbour” Scheme.
8. The **Greenway** joining the Grand Canal to Croghan Hill and linking onto Westmeath be constructed along the route of the old Light Rail Network.
9. That the historic lake, “**Lough na Shade**” be reinstated, and this section of bog reflooded, as a biodiverse/amenity area.
10. That An Bord Pleanála allow an **Oral Hearing** as part of this development to allow local residents the opportunity to discuss their concerns.



### Submission Detail:

1. The cabling connecting this development to the substation be located entirely underground with no **overhead wires/pylons permitted**.

### Rationale

The proposed cable way will have a major visual impact on the surrounding countryside. This imposition can be overcome by undergrounding the entire cable way from Derrygreenagh to Tubberdaly.

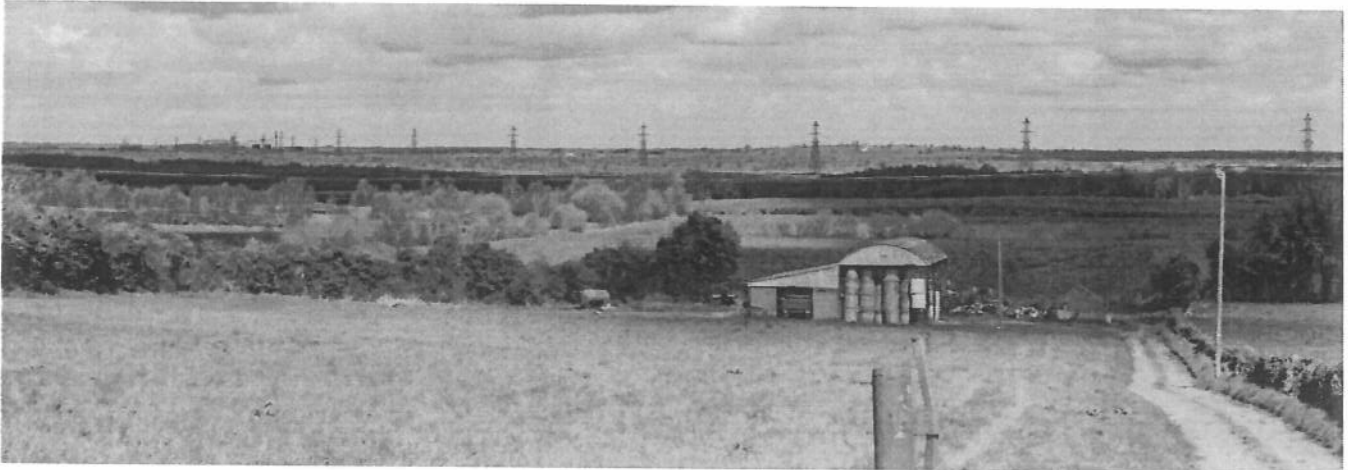


Image showing Cable route linking Derrygreenagh to substation at Tubberdaly as viewed from the Rhode – Croghan road at Barrybrook.

In drafting the current County Development Plan, we included the following policy on the sensitive nature of Croghan Hill and its surrounding landscape.

*“The Council recognises the scenic quality and recreational value of the Croghan Hill area. Croghan Hill, and Cannakill Deserted Medieval Village are the main elements of the Area of High Amenity. The Council, through its development management function, will seek to preserve the scenic amenity and recreational potential of this area and to **protect it from development that would damage or diminish its overall attractiveness and character**. A comprehensive study of the Croghan Hill environment was published in 2011 by John Feehan titled ‘Croghan, County Offaly.’”*

County Offaly Development Plan, Ch 4, Landscape and Biodiversity, Pg 136



The County Development Plan further notes that,

- ✓ Croghan Hill is an extinct volcano which lies 234 meters above sea level and **commands views over north and east Offaly and the surrounding counties**.

### Sensitivities

- ✓ This is an **area of archaeological and high amenity value and is highly sensitive to new developments**.
- ✓ Croghan Hill, due to its **elevated nature in comparison to its surrounding flat landscape, impacts on the visual quality of the surrounding area and is highly sensitive to developments of any nature, in particular sand and gravel extraction**.

County Offaly Development Plan, Ch 4, Landscape and Biodiversity, Pg 145

2. A **pavement/structural survey of the R400 and L1010** be carried out and works completed in advance of any construction taking place.

Rationale

The site is accessed Via the R400. This road is constructed on a **peat foundation** and is consistently in poor condition. Being a road over peat; several accidents occur along this road each year when HGVs move off the road edge onto the adjoining peatlands.

The bridge over the Yellow River on the R400 failed in July 2023 and this regional road was closed for almost 5 moths while a new bridge was installed. This was one of two such masonry arch bridges located on the R400, on the haul route identified for this project.

The closure of the R400 last Autumn caused significant damage to the local roads that were being used as diversion routes over this time. No upgrading works have been carried out on these roads to date.

The applicant states that *“The Pavement assessment setting out the existing road surface quality is provided in Appendix 14A.*

*EIAR Chapter 14: Traffic and Transportation*

**No such survey is included in this planning application.**

The poor nature of the roads in our area owing to their peat-based foundations can be seen on the illustration below.



- ✓ Green/Blue – Roads in Good Condition
- ✓ Yellow – Roads requiring minor upgrading
- ✓ Red – Roads requiring major upgrading
- ★ Proposed Development

3. The R400 at Derrygreenagh Hill be widened and upgraded.

The image below shows the southern approach to the proposed development at Derrygreenagh Hill. This section of road is extremely narrow and major widening and upgrading works would be required in advance of any construction works taking place.



The image below shows the junction upgrades sought by the local Authority on File No Planning Reg. Ref PL2/21/247 and PL2/22490 (Currently under appeal to ABP). As this junction is part of the haul route associated with this development, these works should also be completed prior to construction.

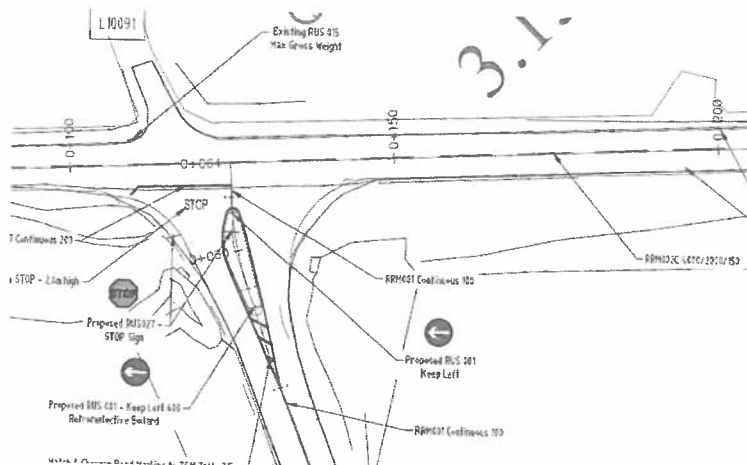
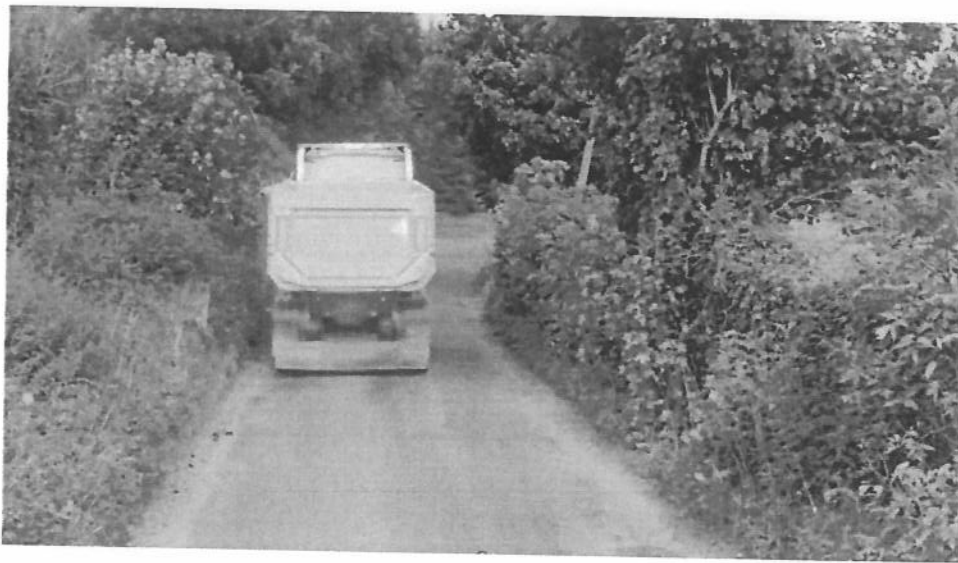


Image above of proposed upgrade works, where the Quarry Road intersects with the R400 and Knockdrin Lane, as referenced in planning applications PL2/21/247 (Kilmurry Precast) and PL2/22490 (Oxygen Environmental)

4. The L1010 (Rhode Village – Taylors Cross) be widened where feasible and **overlaid with a new road surface in advance of construction works.**

The image below shows the Local Road L1010, which the applicant states is to accommodate 40% of the traffic associated with the cable route. This road is in very poor condition at present and unfit to deal with such traffic movements without significant upgrading and widening.

It is clear from the image, that two vehicles cannot pass safely on several sections of this road.



5. A condition be placed on the applicant to construct a **Footpath from Priory Lawns to the Football Field** before construction commences.

There is no pedestrian access linking Rhode Village with the GAA Field at present. Each week, hundreds of people, especially children and teenagers attend training and matches in the GAA Field. Rhode has a deep-rooted association with the GAA and pedestrian access our club facilities located on the L1010 should be seen as a priority for the safety of people in the area.



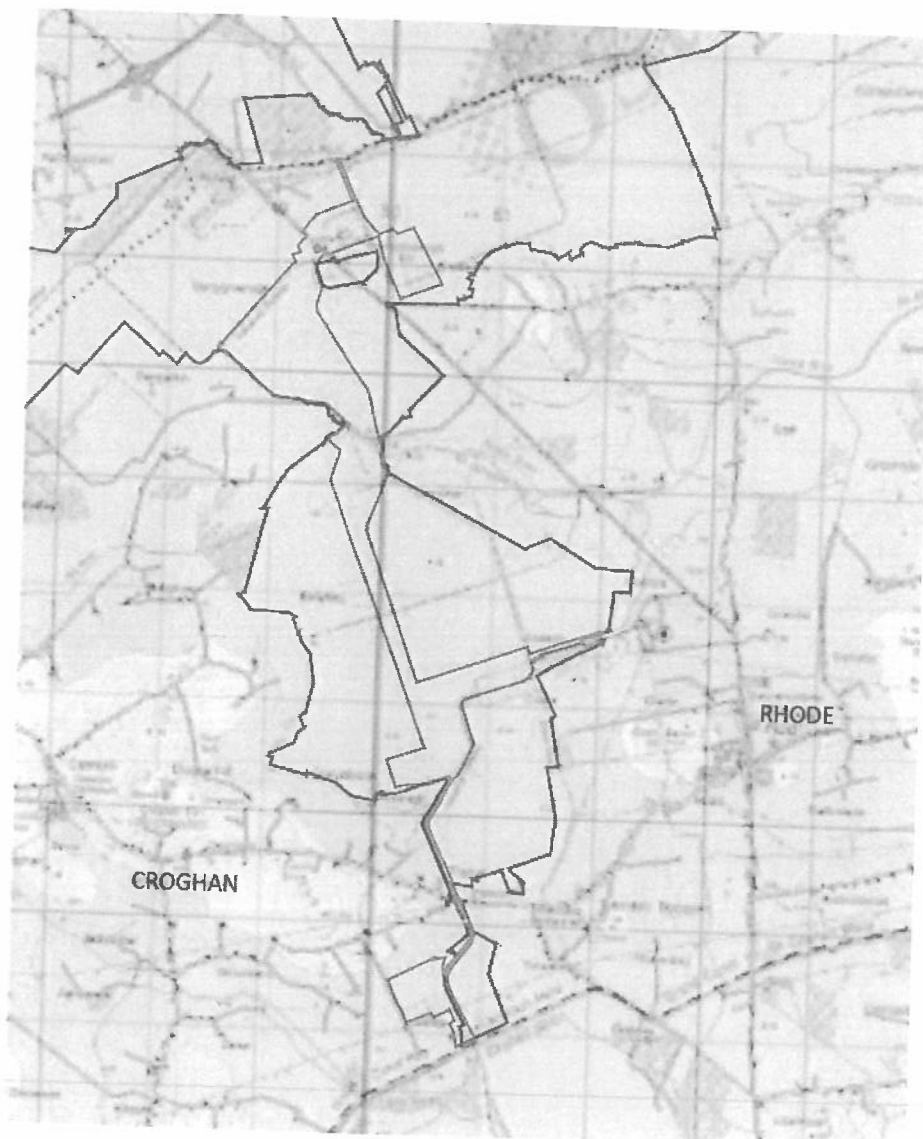
6. The proposed **Community Benefit Fund be index linked** to output as is currently best practice for Wind/Solar developments under the current RESS Guidelines. (Currently €2/MWh)

In their application BNM state that they intend to operate a Community Benefit Fund for 5 Years with a contribution of €90,000 per year. While I acknowledge this is a good will gesture, as it is not a requirement under the current RESS guidelines, I do believe the fund should be larger and run for the lifetime of the development. The monies earmarked for this fund should be index linked to output as is best practice under the current RESS Scheme. To put this development in context, County Offalys largest Windfarm "Yellow River" is located adjacent to this site and has a Community benefit fund of Circa €595,000 per annum.

**This Proposed Power Station will generate 6 times more power than Yellow River Windfarm yet contribute 85% less in Community Funding Per Annum.**

7. Houses **located within 1km of the development boundary**, and not just the Power Plant site be included in a "Near Neighbour" Scheme.

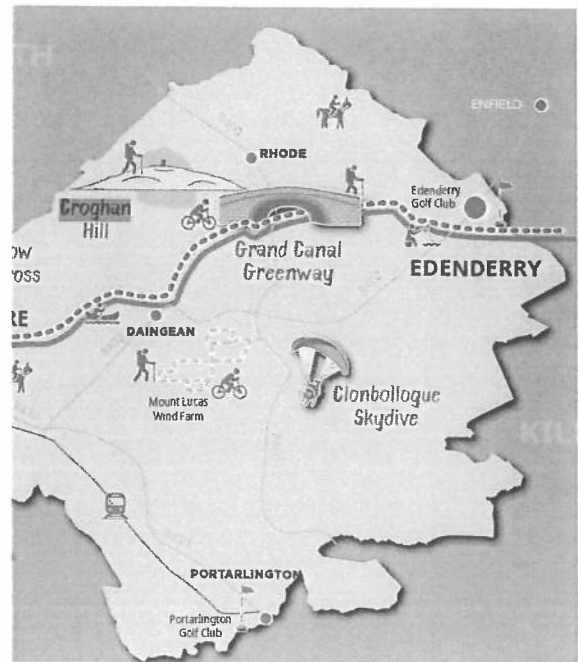
The red outline below shows that the development boundaries of this development extend beyond the site of the Power Station building itself. There are no houses located within 1km of the Power Station Building, but homes located next to cable routes and substations should qualify for a near neighbour payment as they are equally as affected.



8. The **Greenway** joining the Grand Canal to Croghan Hill and linking onto Westmeath be constructed along the route of the old Light Rail Network.

Over the past year a lot of effort has been made to have the Greenway extended to Croghan and onto the existing Greenway Trails in Westmeath. Much of this route was earmarked along the disused light rail line.

The Cable way associated with this development now proposed to utilise this rail line also. The construction of the Greenway route along this line should be included as part of the post construction remediation work.



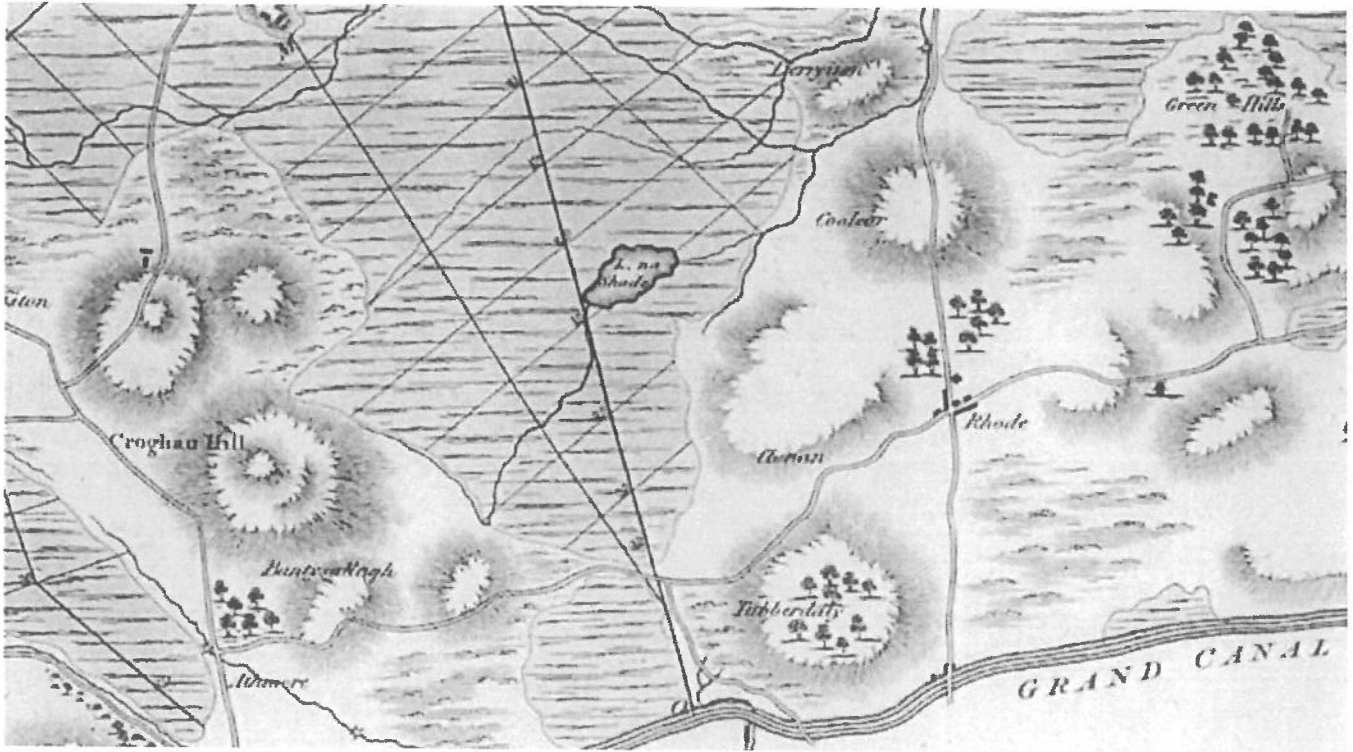
9. That the historic lake, “**Lough na Shade**” be reinstated, and this section of bog reflooded, as a biodiverse/amenity area.

Below - Croghan Hill overlooking the former site of Lough na Shade



Lough Na Shade is a historic lake located between Rhode and Croghan which was drained as part of the development of the bogs in the 1950s. Lough Na Shade is cited on Samuel Lewis 1837 Maps of Bogs in the Irish midlands. The area around the lake is of some archeological merit. A report from the time noted the discovery of “A dug-out coracle (Boat) of oak” found at Lough-na-Shade, a grown-over lakelet, ... in **Derrygreenagh Bog**. It was discovered, in January 1955, in a newly opened Bord na Mona drain.” Given the close proximity of this peatland to the development it seems sensible that this area of bog be rewetted/rewilded and with a view to reinstating Lough na Shade if that is now feasible.

This is the closest section of cutaway bog to Croghan Hill, it has been noted for its archaeological features in several studies and is worthy of protection. The re-creation of the historic lake at Lough na Shade would act as a significant buffer to protect the views from Croghan Hill.



Alex Jones' 1811 Maps of the Bogs of Ireland showing L. na Shade

10. That An Board Pleanála allow an **Oral Hearing** as part of this development to allow local residents the opportunity to discuss their concerns.

In conclusion, I would ask that the board considers the points raised above.

Furthermore, I would ask that our local community be afforded the opportunity to expand on the points raised in this submission through the medium of an oral hearing.

Thanking you for taking the time to consider this request.

Cllr Liam Quinn  
Ballyteige Little,  
Ballycommon,  
Tullamore,  
Co Offaly  
R35C5C9

*Liam 2*

2<sup>nd</sup> April 2024

