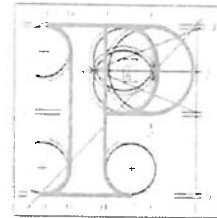


Our Case Number: ABP-319023-24



An
Bord
Pleanála

Adele Kierans
Droskyn Point
Ballybrittan
Edenderry
Co. Offaly
R45 YY63

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)

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.

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

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

Submission regarding the following planning application

Application Details: File No: 319023 (SID Application)

Applicant: Bord 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 above:

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. The Greenway joining the Grand Canal to Croghan Hill and linking onto Westmeath be constructed along the route of the old Light Rail Network
8. That An Bord Pleanála allow an Oral Hearing as part of this development to allow the 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.

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. In the current County Development Plan, regarding the sensitive nature of Croghan Hill and its surrounding landscape it states "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."

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. It 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.

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.

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 months 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. In addition to this significant disruption to residents, the R400 and surrounding roads currently take a lot of construction traffic, particularly for the Yellow River Wind Farm, but also for other projects across the area. Residents are constantly trying to navigate the varying potholes and subsidence on this road as additional projects are given permission with no mitigating conditions being put on the applicants. In many instances the applicants are to contribute to repairing the road after the construction

is completed, but this does not take into account the damage to the road, and disruption to residents, during the construction.

Also, 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, and even if it was, putting the roads back to their current condition, which is in the middle of the destruction being caused by other construction, is not acceptable.

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

This section of road is extremely narrow and major widening and upgrading works would be required in advance of any construction works taking place. Additionally there are a number of junctions along the haul route requiring upgrade before this development should commence.

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

The applicant states that the Local Road L1010 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. Currently 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 to the club facilities located on the L1010 should be seen as a priority for the safety of people in the area as this will be used for construction traffic.

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 Bord Na Mona state that they intend to operate a Community Benefit Fund for 5 Years with a contribution of €90,000 per year. I understand that this is a good will gesture, as it is not a requirement under the current RESS guidelines, but I 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 Offaly's 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. 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 proposes 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.

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

In conclusion, I would ask that the board considers the points raised above. I also believe that our local community should be given the opportunity to expand on the points raised in their submissions through the medium of an oral hearing.

Thank you for taking the time to consider this submission.

Adele Kierans
Droskyn Point
Ballybrittan
Edenderry
Co. Offaly
R45 YY63
5th April 2024