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09 May 2025

Our Ref: 11339

Your Ref: 314965-22

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

RE: Proposed Derryadd Wind Farm Strategic Infrastructure Development at Derryadd, Co. Longford.

To whom it may concern,

On behalf of our client Bord na Móna Powergen Limited (hereafter referred to as the Applicant), please find enclosed a planning application for a 10-year permission for the proposed construction of a wind farm (and all associated infrastructure) at a site located on three bogs (Derryaroge, Derryadd and Lough Bannow) within the Mountdillon Bog Group in Co. Longford. The proposed development comprises of temporary accommodation work which will take place outside of the wind farm site along the turbine delivery route.

The proposed wind farm site has an area of approximately 1,900 hectares in size and lies directly to the east of the R392 which runs from Lanesborough in the north to Ballymahon in the south.

This application is being made directly to An Bord Pleanála as 'Strategic Infrastructure Development' (SID) under the provisions of Section 37E of the Planning and Development Act 2000 as amended. This position was confirmed by An Bord Pleanála to the applicant on 29th August 2023 following pre-application consultations with the Board (Case Number – ABP-314965-22), a copy of the noted correspondence is enclosed with this letter for completeness.

The proposed wind farm site is located within the townlands of Aghamore, Annaghbeg, Annaghmore, Ards, Ballynakill, Barnacor, Cloonbearla, Cloonbony, Cloonbrock, Cloonfiugh, Cloonfore, Cloonkeel, Cloontabeg, Cloontamore, Coolnahinch, Corlea, Corralough, Derraghan Beg, Derraghan More, Derryad, Derryaroge, Derryart, Derrygeel, Derryglogher, Derrynaskea, Derryoghil, Derryshannoge, Grillagh, Kilmakinlan, Kilnacarrow, Lyneen, Mosstown, Mount Davys, Rappareehill at Lanesborough, County Longford and within the townland of Ballypheasan, Co. Roscommon.

The Applicant wishes to highlight that this application for the proposed wind farm development, Derryadd Wind Farm, follows a separate application for substitute consent (Case Number ABP 322204-25) which was submitted to An Bord Pleanála on 1st April 2025 under the provisions of Section 177E of the Planning and Development Act 2000, as amended. The application for substitute consent seeks to regularise peat extraction activities and all ancillary works at Derryaroge, Derryadd, and Lough Bannow Bogs. The proposed Derryadd Wind Farm development is located on lands which are the subject of the application for substitute consent.

Directors: M. Shelly (Chairman) C. McGovern (Managing Director) E. Connaughton (Company Secretary)

B. Downes D. Grehan M. McDonnell J. McGrath

B. Carroll S. Tinnelly J. O'Flaherty

Technical Directors:

B. Gallagher B. Heaney C. Kelly T. Mackey D. Meade O. Fitzpatrick P. Cloonan P. Cunningham

Associate Directors:

M. Casey E. Fenton L. Kennedy P. O'Connor B. Rudden M. Geraghty S. Ryan R. Murtagh K. Gallagher

The Applicant

The Applicant Bord na Móna Powergen Ltd., which is a subsidiary of Bord na Móna Plc, an Irish semi-state company. Bord na Móna has been serving communities for over 90 years, always rising to meet the needs of the day. It was founded in 1934 as The Turf Development Board Ltd to enhance national energy security through peat extraction and became Bord na Móna in 1946 with the commencement of the Turf Development Act 1946.

Bord na Móna's lands extend to approximately 80,000 hectares in total and are located mainly in the Irish midlands. Bord na Móna Powergen Ltd. currently manage and operate a portfolio of thermal and renewable assets that supply energy to the National Grid including Edenderry Power Plant, a biomass co-fired generating unit, Cushaling peaking plant, the Drehid landfill gas facility, Bellacorick Wind Farm and Oweninny Wind Farm (Phase 1 and Phase 2)in County Mayo, Mountlucas and Cloncreen Wind Farms in County Offaly and Bruckana Wind Farm, situated on the borders of counties Tipperary, Kilkenny and Laois, Derrinlough Wind Farm in County Offaly and Timahoe North Solar Farm in County Kildare.

Proposed Development

The proposed development will comprise the following:

- 22 no. wind turbines with a blade tip height of 190 m, blade rotor diameter of 165 m, hub height of 107.5 m and the associated infrastructure including tower sections, nacelle, hub, and rotor blades and all associated foundations and hard-standing areas in respect of each turbine;
- New internal site access roads, approximately 27,500 m in length including passing bays and associated drainage;
- 2 no. permanent Meteorological Masts, both of which will be 120 m in height, and associated hardstanding areas for both masts, as well as the decommissioning and removal of an existing 100 m Meteorological Mast on site in Lough Bannow Bog;
- 4 No. Borrow pits in Derryadd Bog; All works associated with the opening, gravel and spoil extraction, and decommissionings of the borrow pits;
- 4 No. temporary construction compounds, including material storage, site welfare facilities, and site
 offices;
- 4 No. temporary security cabins at the main construction site entrances as well as at a number of access points around the proposed wind farm site;
- 1 no. 110 kV electrical substation compound in Derryaroge Bog. The substation will consist of 2 No. control buildings, a 36 m high telecommunications tower, associated electrical plant and equipment, ground water well, wastewater holding tank and welfare facilities;
- All associated underground electrical and communications cabling connecting the turbines and masts to
 the proposed electrical substation, including road crossing at N63 and associated grid connection via a
 110 kV loop-in connection to the existing Lanesborough-Richmond 110 kV overhead line which
 traverses the proposed wind farm site;
- 1 No. 16 MW battery storage facility;
- 2 No. Peat Deposition Area, one to the north of the proposed substation compound in Derryaroge Bog and one in Derryadd Bog;
- New site access entrances, temporary improvements and modifications to existing public road infrastructure to facilitate delivery of abnormal loads including locations on N6 Eastbound Slip Road, N6/N61 Roundabout at Athlone, N61/N63 Roundabout at Roscommon, N63 Roscommon Arts Centre Roundabout and N61/N63 Roundabout, Northeast of Roscommon;
- Hinge 3 No. permanent lighting fixtures in Folio RN40465F in Roscommon town to facilitate the delivery of abnormal loads (i.e. turbine blades);

- Approximately 7,500 m of dedicated amenity access tracks to provide linkages between the proposed wind farm site roads and the existing royal canal greenway (to the east) and Corlea visitor centre and amenity areas (to the south) and the Midlands Trail Networks project (to the north);
- 3 No. permanent amenity carparks, one of which is situated in Derryaroge Bog (19 no. car parking spaces in total) and two carparks in Derryadd Bog (19 no. car parking spaces in each carpark);
- All associated site work and ancillary works including new drainage and upgrading existing drainage, access road, earthworks, site reinstatement and erosion control, which will be aligned with the existing and future site rehabilitation plans;
- A 10-year planning permission is being sought with a 30-year operational life from the date of commissioning of the entire wind farm.

Given the recent advances in turbine technology, and the anticipated lifespan of wind turbines, this is considered to be the optimal operational life for the proposed development. The duration of this operational life allows the proposed turbines to be used to generate clean renewable energy until they have reached the end of their life, rather than being removed prematurely.

A detailed description of the proposed development is set out in the enclosed public notices and a complete description is set out in the application documents. The application includes an Environmental Impact Assessment Report (EIAR) and a Natura Impact Assessment (NIS). The application may also be viewed at a dedicated website:www.derryaddwindfarmplanning.ie

The Need for the Proposed Development

The development of wind energy as an after use for cutaway peatlands is specifically identified in the Bord na Móna, 'Strategic Framework for The Future Use of Peatlands' (May 2011).

When considering the need for this wind farm development, and wind energy as an energy source in general, it is important to place its development in an international, national, regional and local policy context from the perspectives of environment, energy and planning. Chapter 5, section 5.6 Planning and Development Policy Context of the EIAR outlines the legislative mechanisms and requirements from a global to local level in detail, which have been formulated to support the generation of energy from renewable sources and reduce the dependency on fossil fuels and increase security of energy supply.

In Chapter 5, section 5.6of the EIAR, the national policy that drives the need for the type of development is set out. Of particular relevance is the Energy White Paper – Ireland's Transition to a Low Carbon Energy Future, as well as the targets outlined by the Climate Action Plan 2024. Ireland faces significant challenges to meet its EU targets for renewable energy by 2030 and its commitment to transition to a low carbon economy by 2050.

A key target of the Climate Action Plan 2024 is the strategic increase in the share of electricity demand generated from renewable sources to 80% by 2030. A key element of this ambition is a target of 9GW of installed onshore wind energy by 2030.

It should be noted that there is a considerable economic benefit to the development of wind farms nationally and specifically at this location. In the National context, a Pöyry report published in March 2014 entitled 'The Value of Wind Energy to Ireland' stated that the sector could support 22,510 jobs in the construction stage and double the number of existing jobs in the operational phase by 2030. It also projected an investment of €4.8 billion in the time period from 2020 to 2030. The potential local economic impact in the Longford area will also be positive by bringing employment to the area during the construction works. Further information on the local economic impacts of the proposed development is discussed in Chapter 6 (Population and Human Health). A 2021 report¹ by KPMG for Wind Energy Ireland titled 'Accelerating onshore renewable energy in Ireland' estimated that jobs in the wind

¹ https://assets.kpmg.com/content/dam/kpmg/ie/pdf/2024/01/ie-act-now-onshore-renewable-energy-ireland-3.pdf

industry in Ireland could grow to over 7,000 by 2030. A 2021 report² by Baringa titled '*A zero-carbon electricity plan for Ireland*' discusses the potential financial costs and savings of the use of renewable electricity for the end customer when compared to a fossil fuel use scenario. The report found that although there were some additional costs in certain areas associated with the use of renewable energy, there were also savings that could be made, and overall, there was a potential to make significant cost savings to the end customer by 2030 when compared to a purely fossil fuel scenario.

The proposed development is critical to helping Ireland address these challenges as well as addressing the country's over-dependence on imported fossil fuels.

The assessment in Chapter 5 of this EIAR (Policy, Planning and Development Context) demonstrates that the proposed development is consistent with the current energy and planning policy context, which seeks to increase the share of electricity generation from renewable sources and locate wind energy developments in suitable locations, thereby minimising any environmental impacts.

Supporting Documents

The following documents are included in the application pack:

- Planning Application Documentation
 - Planning Application Form
 - Site Notice
 - Newspaper Notice
 - EIAR Portal Confirmation (2025072)
 - Cover Letters (An Bord Pleanála, Longford County Council and Roscommon County Council)
 - Letters of Consent from Relevant Landowner
 - Confirmation of SID determination
 - Schedule of Prescribed Bodies and copy of notification letters sent
 - Confirmation of payment of SID Planning Application Fee of €100,000.00
- Planning Application Drawings (See addendum to application form which also has schedule and confirmation of suitability of drawing scales)
- Environmental Impact Assessment Report (EIAR)
 - Volume 1- EIAR Non-Technical Summary (NTS)
 - Volume 2- EIAR Main Body
 - Volume 3- EIAR Appendices
 - Volume 4- Photomontages
- Natura Impact Statement (NIS)

Please find 2 no. hard copies and 8 no. electronic copies (USB format) of the planning application pack enclosed with this letter. Longford County Council has also received 1 no. hard copy and 2 no. electronic copies and Roscommon County Council received 1 no. hard copy and 1 no. electronic copy. All prescribed bodies as identified in the Board's letter dated 29th August 2023 (Case Ref. ABP 314965-22) are being provided with application documentation in a digital format via a link to the dedicated application website mentioned above.

I trust that you have all the information you require to progress the application. If, however, you have any queries or wish to discuss any matter in detail, please do not hesitate to contact me.

We look forward to your decision in due course.

² https://windenergyireland.com/images/files/20210629-baringa-endgame-final-version.pdf

Yours sincerely,

Ian Heanue

For and on behalf of TOBIN (Agent)

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