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Our Ref: 11399

09 May 2025

Chief Executive,
Planning Department,
Longford County Council
Áras an Chontae
Great Water Street
Longford
N39 NH56

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

To whom it may concern,

I write to inform you that Bord na Móna Powergen Limited (hereafter referred to as the Applicant), is applying to An Bord Pleanála for permission for development in respect of the above project. The proposed development comprises 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.

This application is 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-applications consultations with the Board (Case Number – ABP-314965-22).

The proposed wind farm site, which extends to approximately 1,900 ha and 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 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, 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.

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 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 5.6 of this 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 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

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

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

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.

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 of the submitted EIAR).

Enclosed 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, and Roscommon County Council)
 - Letters of Consent from Relevant Landowners
 - 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)

1 no. hard copy and 2 no. electronic copies of the full planning application, Environmental Impact Assessment Report and Natura Impact Statement are enclosed.

Also as required by An Bord Pleanála, you are hereby requested to keep this planning application available for public inspection/purchase in accordance with the terms of the public notice attached with this application. It is recommended that all of the application documentation will remain available for public inspection until a decision has been formally issued by An Bord Pleanála.

In considering this application, An Bord Pleanála can decide to:

- (a);
 - (i) grant the permission, or
 - (ii) make such modifications to the proposed development as it specifies in its permission and grant permission in respect of the proposed development as so modified or
 - (iii) grant permission in respect of part of the proposed development with or without specified modifications of it of the foregoing kind and any of the above decisions may be subject to or without conditions, or
- (b) refuse to grant permission.



Any submissions/observations must be made to the Board at 64 Marlborough Street, Dublin 1, D01V902 relating to:

- (i) the implications of the proposed development for proper planning and sustainable development of the area concerned;
- (ii) the likely significant effects on the environment of the proposed development if carried out;
- (iii) the likely effects of the proposed development on a European Site, if carried out.

Any submissions/observations must be received by the Board not later than 5.30pm on the 2nd July 2025.

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. The application includes an Environmental Impact Assessment Report and a Natura Impact Assessment. The application may also be viewed at a dedicated website: www.derryaddwindfarmplanning.ie and the public offices of An Bord Pleanála, Marlborough Street, Dublin 1.

Yours sincerely,



Ian Heanue

For and on behalf of TOBIN (Agent)

Ian.Heanue@tobin.ie

