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4909/101/02/005/DK/AK

17th June 2013

The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1.

Re: An Bord Pleanála Reference PC 0149
Proposed Yellow River Wind Farm, north of Rhode, Co. Offaly

A Chara,

On behalf of our Client, Greenwind Energy (Wexford) Ltd., 46 Westgate Park, Wexford, we, Jennings O'Donovan & Partners Ltd., Consulting Engineers, Finisklin Business Park, Sligo, hereby submit that the above proposed development should proceed through the planning process as a Strategic Infrastructure project in compliance with Section 37A(2) of the Planning and Development (Strategic Infrastructure) Act, 2006.

The project will comprise 32 wind turbines having a potential output of 96MW and exceeds the statutory thresholds of more than 25 turbines or 50 megawatts specified in the Seventh Schedule of the Planning and Development (Strategic Infrastructure) Act, 2006 as amended by s78 of the Planning and Development Amendment Act 2010.

All parts of the site will be contiguous. The site will be fully contained within County Offaly and is located within an area (Area No. 1) designated as *Suitable for Large Scale Windfarms* in Figure 8 and Table 1 of the County Offaly Wind Energy Strategy to 2015, January 2009.

The proposed development will be sited within an area which has experienced/is experiencing industrial scale harvesting of peat and which is proximate to the former Rhode peat burning power plant, a new 100MW Peaking Plant at Rhode and to Derryiron 110kV sub-station. A 400kV line runs south of Rhode and a 220kV line runs north of the M6.

We consider that the proposed development should be regarded as strategic infrastructure development, as it satisfies the following criteria as set out in section 37A(2) of the 2006 Act:

(a) The development would be of strategic economic or social importance to the State or the region in which it would be situate.
The development aims to generate approximately 252,000 MWh of electricity per year. This would be enough to supply up to 50,400[1] households. This is the equivalent energy production to that from 53,760 tonnes of oil each year. It will indirectly, benefit the region by virtue of providing a power supply platform on which to develop industrial sectors. By displacing fossil fuel generation, the wind farm would avoid the following annual discharges of 144,000 tonnes of carbon dioxide.

[1] http://www.seai.ie/Renewables/Wind_Energy/Wind_Farms/Wind_Farms_and_the_Environment/assuming 30% capacity

(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 force in respect of the area or areas in which it would be situate.

The development will contribute towards the actions and targets for the energy policy framework up to 2020 as outlined in the White Paper entitled "Delivering a Sustainable Energy Future for Ireland" published by the Department of Communications, Marine and Natural Resources. The Paper sets a clear path for meeting the Government's goals of ensuring safe and secure energy supplies, promoting a sustainable energy future, and supporting competitiveness. Section 3.9.5 of the Paper states that 33% of all electrical consumption will be generated from renewable energy sources by 2020. This target has since been increased to 40% from renewable energy sources (Dáil Statement, Budget 2009)

The proposed development is also supportive of the objectives of Midland Regional Authority, Regional Development Guidelines, Adopted 25 May 2004 which in Section 4.7, "The Future of Rural Areas in the Region" states:

"The potential of worked out peat land areas with links to the existing electricity infrastructure, as suitable locations for renewable energy installations should be investigated."

Section 4.7 also states that the National Spatial Strategy *"makes specific reference to the worked out bogs in the midland region and their possible future use for wind energy development. These large expanses of flat open lands can offer significant wind resources and the midlands has an opportunity to become a key player in the renewable energies industry."*

Under Section 7.4 "Common Spatial Issues and Priorities, Bogland" it states that the following should be among the issues considered:

"Alternative uses for cutaway and cutover boglands should be investigated, particularly in relation to the alternative and renewable energy industries."

The energy installation is therefore such as to be of strategic importance to the region and supportive of the policies for the development of renewable energy within the region.

(c) The development would have a significant effect on the area of more than one planning authority.

While the site is located entirely within County Offaly, the centre of the nearest turbine is some 275m from the County Westmeath border, some 60m from County Meath and some 4,500m from County Kildare.

The proposed development would be complementary to the existing Development Plans and Policies of the adjacent Planning Authorities. These include Section 8.15 of the Meath County Council Development Plan 2013 – 2019, Section 2.3.7 of the Westmeath County Development Plan 2008 – 2014, and Section 8.5 of the Kildare County Development Plan 2011 – 2017.

The proposed development would also be complementary to future Development Plans such as Policy P-EN1, Policy P-WIN2 and Section 10.5.2 "Industrial Scale Wind Farms" of the Draft Westmeath County Development Plan 2014 – 2020. Policy P-WIN2 states:

"To direct large-scale energy projects, in the form of wind farms, onto cutover bog cutaway peatlands in the County, subject to environmental, landscape, habitats and wildlife protection requirements being addressed."

We trust that the above discussion will enable you to decide that the proposed development will constitute strategic infrastructure as defined in the Planning and Development Act, 2006, as amended, with particular reference and consideration of the provisions as set out in the Seventh Schedule of that Act.

Yours faithfully,

David Kiely

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