

Environmental Impact Assessment Report

Lemanaghan Wind Farm,
Co. Offaly

Chapter 2 Background to the Proposed
Project



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GLOSSARY OF TERMS

Terms	Definition
Carbon Budgets	The maximum cumulative amount of greenhouse gas emissions that can be released into the atmosphere while limiting global warming to a specified level, between 1.5 and 2 degrees
Climate Action and Low Carbon Development (Amendment) Act	Ireland's legally binding framework which aims to achieve a climate-neutral economy by 2050, requiring a 51% reduction in greenhouse gas emissions by 2030
Climate Action Plan	National framework document for measuring, tracking and reducing greenhouse gas emissions and adopting climate adaptation measures.
European Green Deal	An EU policy launched in 2019, aiming to cut emissions by at least 50% by 2030, rising towards 55%, while legally binding the 2050 neutrality goal through the European Climate Law.
Kyoto Protocol	An international treaty adopted in December 1997, requiring industrialised nations to reduce GHG emissions based on principle of common but differentiated responsibilities
National Energy Projections	Predictions of future energy use in Ireland under different scenarios and account for factors such as economic growth
National Energy Security Framework	Policy document produced by Irish government to provide an overarching and comprehensive response to Ireland's energy security needs in the context of the war in Ukraine.
National Planning Framework	A long-term, 20-year strategy for strategic planning and sustainable development of urban and rural areas to 2040, with the core objectives of securing balanced regional development and a sustainable 'compact growth,' approach to the form and pattern of future development.
Paris Agreement	A legally binding international treaty adopted in 2015 to combat climate change, aiming to limit global temperature rise to well below 2 degrees, preferably 1.5 degrees above pre-industrial levels
Planning and Development Act 2024	An Act to consolidate and revise the law relating to planning and development. It precedes the Planning and Development Act 2000 and is acknowledged as a major reform to speed up housing delivery and make the planning system clearer and more efficient.
Renewable Energy Directive	An EU Directive which aims to accelerate the EU's renewable energy transition and promote energy independence
REPowerEU	A European Commission plan launched in May 2022 to rapidly reduce dependence on Russian fossil fuels and to accelerate the green energy transition following Russia's invasion of Ukraine.
The Climate Change Advisory Council	An Independent advisory body providing evidence-based advice and recommendations on policy to support Ireland's just transition

	to a biodiversity rich, environmentally sustainable, climate neutral and resilient society.
United Nations Framework Convention on Climate Change	1992 International Treaty aimed at stabilising atmospheric greenhouse gas concentrations to prevent dangerous human-induced climate interference
Wind Energy Development Guidelines	Guidelines released by the Irish government in 2006 to offer advice to planning authorities on planning for wind energy through the development plan process and in determining applications for planning permission. The guidelines are intended to ensure a consistency of approval.

GLOSSARY OF ACRONYMS

Acronym	Meaning
AA	Appropriate Assessment
ACP	An Coimisiún Pleanála
BAI	Broadcasting Authority of Ireland
BnM	Bord na Móna
C	Carbon
CAP	Climate Action Plan
CARO	Climate Action Regional Office
CCAC	Climate Change Advisory Council
CER	Commission for Energy Regulation
CH ₄	Methane
CLO	Community Liaison Officer
CO ₂	Carbon Dioxide
COP	Conference of Parties
CRU	Commission for Regulations of Utilities
DCCAIE	Department of Communications, Climate Action and Environment
DCENR	Department of Communications, Energy and Natural Resources
DECC	Department of the Environment, Climate and Communications
DOC	Dissolved Organic Carbon
DoEHLG	Department of Environment, Heritage and Local Government

DoHPLG	Department of Housing, Planning and Local Government
EIAR	Environmental Impact Assessment Report
EIS	Environmental Impact Statement
EMRA	Eastern and Midland Regional Assembly
EPA	Environmental Protection Agency
ESR	Effort Sharing Regulation
ETS	Emissions Trading Scheme
EU	European Union
GHG	Greenhouse Gas
GIS	Geographic Information System
GST	Global Stocktake
ICCA	Ireland's Climate Change Assessment
IEA	International Energy Authority
IPC	Integrated Pollution Control
IPCC	Intergovernmental Panel on Climate Change
IWEA	Irish Wind Energy Association
LCA	Landscape Character Assessment
LCEP	Local Economic and Community Plans
LNG	Liquefied Natural Gas
LVIA	Landscape and Visual Effects
MS	Microsoft Teams
MW	Megawatts
NDP	National Development Plan
NEROS	Network Monitoring Rewetted and Restored Peatlands/Organic Soils for Climate and Biodiversity Benefits
NGO	Non-Governmental Organisation
NIS	Natura Impact Statement
NMS	National Monument Service

NPF	National Planning Framework
NPWS	National Parks and Wildlife Service
NSO	National Strategy Outcome
OCC	Offaly County Council
OCDP	Offaly County Development Plan
PAS	Plans to Accelerate Solutions
PCAS	Peatland Climate Action Scheme
REC	Renewable Energy Community
RED	Renewable Energy Directive
rEIAR	Remedial Environmental Impact Assessment Report
RESS	Renewable Electricity Support Scheme
rNIS	Remedial Natura Impact Statement
RPOs	Regional Policy Objectives
RSES	Regional Spatial and Economic Strategies
SEAI	Sustainable Energy Authority Ireland
SID	Strategic Infrastructure Development
TDP	Transmission Development Plan
UN	United Nations
UNFCCC	United Nations Framework Convention on Climate Change
WAM	With Additional Measures
WEM	With Existing Measures
WES	Wind Energy Strategy
WFD	Water Framework Directive
WHO	World Health Organisation
WMO	World Meteorological Organisation

2. BACKGROUND TO THE PROPOSED PROJECT

2.1 Introduction

This chapter of the Environmental Impact Assessment Report (EIAR) presents the policies and targets which have been put in place at the various levels of Government including international, national, regional and local policies and guidance in relation to planning, renewable energy and climate change which are relevant to the Proposed Project. The details below set out the need for the Proposed Project as it will directly contribute to Ireland meeting its national targets and European commitments in relation to renewable energy generation, climate change and decarbonisation.

This chapter summarises the EIAR scoping exercise, the pre-planning and community consultation undertaken and the cumulative impact assessment process.

This chapter also provides a summary of the planning policy context relevant to the Proposed Project and should be read in conjunction with the Planning Report which accompanies the planning application.

The proposed Lemanaghan Wind Farm, referred to as the 'Proposed Project', is being brought forward by the Applicant (Lemanaghan Wind Farm DAC) in response to local, regional, national and European policy regarding Ireland's transition to a low-carbon economy, associated climate change policy objectives and to reduce Ireland's dependence on imported fossil fuels for the production of electricity.

The planning application for the Proposed Project, accompanied by this EIAR and a Natura Impact Statement (NIS), will be submitted to An Coimisiún Pleanála (ACP) in accordance with Section 37E of the Planning and Development Act 2000, (as amended) ('the Planning Act').

As detailed in **Section 1.1.1 of Chapter 1** of this EIAR the various project components are described and assessed using the following references: 'Proposed Project', 'Proposed Grid Connection', 'Proposed Wind Farm', 'Proposed Project site', and 'site'. A detailed description of the Proposed Project is provided in **Chapter 4** of this EIAR.

2.1.1 Statement of Authority

MKO has developed extensive expertise and experience over the last 15 years in preparing Background and Planning Policy Context Chapters for a range of projects, including multiple large scale wind energy development.

This chapter was written by Ronan Dunne with support from Mike Amiel Mekell and Shikha Gajula, and was overseen by Sean McCarthy, all of MKO. Ronan Dunne is a Project Planner with MKO with over 3 years of experience in private practice. Ronan holds a BSc (Hons) in City Planning and Environmental Policy and a MSc (Hons) in Urban and Regional Planning from University College Dublin, where he focused his studies on wind energy development. Since joining MKO, Ronan has been involved in a range of infrastructure projects, including onshore and offshore wind, solar, battery storage and grid infrastructure developments. Through his professional and academic experience, Ronan has gained experience in renewable energy planning, Environmental Impact Assessment, strategic and spatial planning, development management, planning appeals, condition compliance, and project management.

Mike Amiel Mekell is a Planner with MKO having joined the company in June 2024. Mike holds a BA (Hons) in Politics, International Relations and Sociology from University College Dublin and an MSc in

Planning and Development from Queen's University Belfast. He is a Licentiate of the Royal Town Planning Institute. Prior to taking up his position with MKO, Mike worked as a Graduate Environmental Planner with Roughan and O'Donovan. In this role he prepared Environmental Impact Assessment Screening and Scoping reports, environmental monitoring and management reports and planning reports for projects involving public and active transport infrastructure and sustainable tourism development. Since joining MKO, Mike has been involved in a range of renewable energy projects including onshore wind, solar and grid infrastructure developments. His main responsibilities include preparing planning application documents and reports, preparing inputs for Environmental Impact Assessment Reports and liaising with multidisciplinary project teams.

Shikha Gajula is a Graduate Planner with MKO. Shikha holds a Bachelor's degree in Architecture (B.Arch) and a Master's degree in Planning and Development from the University of Galway. Prior to taking up her position with MKO, Shikha worked across multiple sectors. As a licensed architect, she contributed to design and documentation at Katterra Design Pvt Ltd, gaining experience in technical drawings, site analysis and barrier-free design. Since joining MKO, Shikha has been involved in a range of projects, including wind farm and grid infrastructure developments. She has also contributed to research examining wind farm repowering in Ireland for the DCEE. Through her academic background and professional practice, Shikha has gained experience in renewable energy planning, Environmental Impact Assessment, strategic and spatial planning and public participation process.

This preparation of this chapter was overseen by Sean McCarthy, a Project Director with MKO who holds a Bachelor of Science (Hons) in Property Studies from ATU and Master of Science in Urban and Regional Planning from Heriot Watt University, Edinburgh. Sean has over 14 years post qualification experience in consultancy and Local Authority planning. Sean has extensive experience across all development sectors and has been working on renewable energy projects for the past number of years including onshore wind, solar and grid connection development. Sean manages the Planning Renewables Team at MKO, and his experience spans all key areas of planning practice, including development management, forward planning, environmental assessment, and policy interpretation at local, regional, and national levels. Sean has acted on behalf of public and private sector clients and has extensive experience in the preparation, coordination, and review of planning and environmental reports. Sean is competent to provide expert planning opinion and professional judgement in accordance with Irish planning legislation, policy, and best practice.

2.1.2 Renewable Energy Resources

Renewable energy resources are constantly replenished through the cycles of nature, unlike fossil fuels, which are finite resources that are becoming increasingly scarce and expensive to extract. Renewable energy resources offer sustainable alternatives to our dependency on fossil fuels as well as a means of reducing greenhouse gas (GHG) emissions and opportunities to reduce our reliance on imported fuels.

There is an urgency to ensure that real changes occur without delay, which means that a gradual shift towards increasing Ireland's use of renewable energy is no longer viable. Renewable energy development is recognised as a vital component of Ireland's strategy to tackle the challenges of combating climate change and ensuring a secure supply of energy. Ireland is heavily dependent on the import of fossil fuels to meet its energy needs. In 2023, over 81% of Ireland's energy was imported from abroad, higher than the European Union (EU) average of almost 60% (National Energy Security Framework, 2022). 2024 saw a 55% increase in imported electricity relative to 2023¹. This high dependency on energy imports places Ireland in a vulnerable position in terms of meeting future energy needs and ensuring price stability. As such, expanding indigenous renewable energy supply is critical for energy security and price stability. The provision of the Proposed Project would aid in achieving the shift to decarbonising the electricity sector and energy security in Ireland.

¹ Environmental Protection Agency, 'Press release: Ireland's power generation and industrial greenhouse gas emissions down by seven per cent in 2024'. <https://www.epa.ie/news-releases/news-releases-2025/irelands-power-generation-and-industrial-greenhouse-gas-emissions-down-by-seven-per-cent-in-2024-.php>

2.1.3 Need for the Proposed Project

Ireland's Climate Action Plan 2025 sets ambitious yet essential targets for renewable energy, including 9GW of onshore wind capacity by 2030 with at least 6GW to be delivered by 2025 and an 80% share of renewable electricity by the same year. However, multiple assessments, including the Climate Change Advisory Council (CCAC) Annual Review 2025 and the Environmental Protection Agency (EPA) emissions projections², confirm that Ireland is not on track to meet these targets. Significant gaps remain in renewable energy deployment, particularly in grid capacity expansion, as well as onshore and offshore wind energy development, while continued reliance on fossil fuels threatens national and EU climate commitments.

Failure to meet binding EU targets will expose Ireland to financial penalties, increased carbon credit costs, and continued dependence on fossil fuel imports—posing serious risks to energy security and economic stability. Furthermore, Ireland's national interest requires the rapid expansion of renewable energy, making this a matter of strategic economic and social importance. National interest is identified as a matter of regard during planning determination in Section 143(1b) of the Planning Act.

Every viable renewable energy project plays a crucial role in meeting Ireland's climate targets. The approval of well-planned, appropriately located renewable energy projects, such as the Proposed Project is not just beneficial—it is imperative. Without decisive action to facilitate renewable energy deployment, Ireland risks missing national and EU commitments, incurring financial penalties, and undermining energy security.

Please see the accompanying Planning Report and Section 1.5 of Chapter 1: Introduction of this EIAR for further information on the need for the Proposed Project.

2.2 Climate Change Policy and Targets

International and national policy consistently identifies the need to reduce GHG emissions and stresses the importance of reducing global warming. The context of international policy has altered over the last 30-years from being of a warning nature to the current, almost universally accepted belief, that there is a climate change emergency occurring both within Ireland and at a broader global scale. The Intergovernmental Panel on Climate Change (IPCC)'s Sixth Assessment Report³ published in 2021 provides a stark assessment of global climate change and presents evidence that climate changes will increase in all regions of the globe over the coming decades and that much of the damage caused by climate change up to this point is now likely irreversible, such as the rise in sea levels over the course of the 21st century.

The Synthesis Report⁴ of the IPCC Sixth Assessment Report published in March 2023 summarises the state of knowledge of climate change, its widespread impacts and risks. The Synthesis Report states that *'continued global warming is projected to further intensify the global water cycle, including its variability, global monsoon precipitation, and very wet and very dry weather and climate events and seasons'*. The IPCC's projections are evident in extreme climate events occurring across the world.

According to the World Meteorological Organisation's (WMO) *'State of the Global Climate Report 2024'* published in March 2025⁵, atmospheric concentration of carbon dioxide, methane and nitrous oxide in 2023 reached the highest levels in the last 800,000 years. These levels continued to increase in

² Ireland's Greenhouse Gas Emission Projections 2023-2050 <<https://www.epa.ie/publications/monitoring-assessment/climate-change/air-emissions/EPA-GHG-Projections-Report-2022-2050-May24-v2.pdf>>

³ Climate Change 2021 'The Physical Science Basis' (Intergovernmental Panel on Climate Change, August 2021)

⁴ Climate Change 2023 Synthesis Report (IPCC) https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_FullVolume.pdf

⁵ State of the Global Climate 2024 (World Meteorological Organisation, March 2025)

2024. The report also states that the year 2024 was the warmest year on observational record, with temperatures exceeding 1.55° C above pre-industrial levels⁶.

“*The European State of the Climate Report 2024*” produced by WMO and European Union⁷ indicated that:

- Global average values of surface air and sea surface temperatures have increased significantly since the pre-industrial era, by around 1.3° C to 1.4° C and 1° C, respectively.
- Since 1999, an average sea level rise of around 3.7mm globally and 2mm-4mm in the European region has been observed.
- A record increase in carbon dioxide (+2.4 ppm) and methane (+12 ppb) has been observed since 2020.
 - Glaciers in Scandinavia and Svalbard recorded their highest annual rates of mass loss and saw the largest mass loss of any glacier region globally.
 - In 2024, Europe experienced the most widespread flooding since 2013.

“*Ireland’s Climate 2024 Provisional Summary Report*” produced by MET Eireann⁸, similarly reflects on clear and distinct impacts arising from climate change effects within an Irish context:

- 2024 was noted to be the fourth warmest year on record in Ireland with an average temperature of 10.72° C.
- 2024 was provisionally the 39th wettest year since 1941 with most primary stations recording below-average levels of annual rainfall.
- Seven named storms impacted Ireland in 2024, with Storms Isha and Darragh both producing particularly violent storm-force winds.

The IPCC’s Sixth Assessment Report does not, however, conclude that a climate catastrophe is inevitable, but rather, there remains a ‘narrow path’ to determine the future course of climate, mainly by cutting emissions down to net zero. The Proposed Project will contribute to the decarbonisation of the energy sector and reduce harmful emissions. In this regard, it is compliant with national and international climate change policy and targets.

2.2.1

International Climate Change Policy

United Nations Framework Convention on Climate Change

In 1992, Ireland joined an international treaty, the United Nations Framework Convention on Climate Change (UNFCCC), as a framework for international efforts to combat the challenge posed by climate change. The UNFCCC seeks to limit average global temperature increases and the resulting climate change and cope with impacts that are already inevitable. It recognises that the climate system is a shared resource whose stability can be affected by industrial and other emissions of carbon dioxide and other GHGs. The framework set no binding limits on GHG emissions for individual countries and contains no enforcement mechanisms. Instead, the framework outlines how specific international treaties (called "Protocols" or "Agreements") may be negotiated to set binding limits on GHGs.

Kyoto Protocol

The Kyoto Protocol operationalises the UNFCCC by committing industrialised countries and economies in transition to limit and reduce GHG emissions in accordance with agreed individual

⁶ *State of the Global Climate 2024* (World Meteorological Organisation, March 2025)

⁷ *The European State of the Climate Report 2024* (World Meteorological Organization and European Union, April 2025)

⁸ *Ireland’s Climate 2024 Provisional Summary Report* (MET Eireann, March 2025)

targets. Ireland is a Party to the Kyoto Protocol, which came into effect in 2005, and as a result of which, emission reduction targets agreed by developed countries are now binding.

In Doha, Qatar, on 8th December 2012, the "Doha Amendment to the Kyoto Protocol" was adopted which moved to extend the Kyoto Protocol's commitments until 2020, and includes:

- New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from 1st January 2013 to 31st December 2020.
- A revised list of GHGs to be reported on by Parties in the second commitment period; and
- Amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period.

Under the Protocol, countries must meet their targets primarily through national measures, although market-based mechanisms (such as international emissions trading) can also be utilised. An annual Conference of Parties (COP) has been established building upon the Protocol, with the Paris Agreement (COP21) shifting the focus to all countries not just developed nations.

COP21 Paris Agreement

COP21 was the 21st session of the Conference of the Parties (COP) to the UNFCCC. Every year since 1995 (excluding 2020 due to COVID-19), the COP has gathered the 196 Parties (195 countries and the EU) that have ratified the Convention in a different country, to evaluate its implementation and negotiate new commitments. COP21 was organised by the United Nations (UN) and held, in Paris, from 30th November to 12th December 2015. COP21 closed with the adoption of the first international climate agreement (concluded by 195 countries and applicable to all). The 12-page text, made up of a preamble and 29 articles, provides for a limitation of the global average temperature rise to well below 2°C above pre-industrial levels and to limit the increase to 1.5°C. It is flexible and takes into account the needs and capacities of each country. The IPCC's Sixth Assessment Report (2021), outlined above, further collaborates this need to limit any increase in global average temperature to 1.5°C, stating that (underlined for emphasis):

"Humanity has emitted 2,560 billion equivalent tons of CO₂ since 1750, and we only have a budget of 500 more if we want to limit warming to 1.5°C.

By following a trajectory of very low GHG emissions (SSP1-1.9), the threshold of 1.5°C will be reached in the short term, between 2021 and 2040, before being very slightly exceeded (1.6°C anticipated over the period 2041-2060) then respected in the long term (1.4°C anticipated over the period 2081-2100).

Everything is not lost, but we must pursue the Paris Agreement's most ambitious goal of limiting warming to 1.5°C."

An article published by the IPCC on the 6th of October 2018 titled 'Global Warming 1.5°C', notes the impacts of global warming of 1.5°C above pre-industrial levels and related global GHG emission pathways; in the context of mitigation pathways, strengthening of the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty. This special report is part of an invitation contained in the decision of the 21st session of the COP of the UNFCCC to adopt the Paris Agreement and provides an update on the impact of climate change if emissions are not reduced.

COP25 Madrid

COP25, the 25th session of the COP, was held between the 2nd and 13th of December 2019 in Madrid, Spain. The conference was characterised by repeated warnings from civil society (National Government Organisations and corporates) on emerging evidence and scientific consensus on climate change risk. Specifically, it was noted that there is only c. *‘10 years left’ before the opportunity of limiting global warming to 1.5°C is no longer feasible’*. As such, *the only remaining approach to limiting rising global temperatures is a ‘7.6% reduction of global GHG emissions every year between 2020 and 2030, and to reach net-zero emissions by 2050’*. However, consensus was not achieved between States on finalising the operating rules of the Paris Agreement and to ensure that it became operational by 2020. Despite the lack of consensus on the above challenges, the COP25 did achieve more limited success with regard to the introduction of the “San Jose Principles for High Ambition and Integrity of International Carbon Markets”, which sets out the framework on which a robust carbon market should be built. These principles were supported by 23 EU nations, including Ireland, as well as countries in Latin American, 5 no. Pacific Islands and 2 no. countries in the Caribbean.

COP26 Glasgow

COP26 took place in Glasgow, Scotland between the 31st of October and 12th November 2021. The summit was centred around the fact that *“climate change is the greatest risk facing us all”*.

The key items COP26 seeks to achieve are:

- Secure global net zero by mid-century and keep 1.5 degrees within reach;
- Adapt to protect communities and natural habitats;
- Mobilise finance; and
- Work together to deliver.

All world leaders at the summit confirmed the need to urgently address the gaps in ambition and work together to achieve climate action. The summit highlighted that the Paris Agreement is working, with leaders outlining national targets and efforts to further reduce emissions. There was a clear commitment to working together to achieve climate aims, with significant announcements including:

- “Over 40 leaders joined the Breakthrough Agenda, a 10-year plan to work together to create green jobs and growth globally, making clean technologies and solutions the most affordable, accessible and attractive option before 2030 – beginning with power, road transport, steel, hydrogen and agriculture.
- Over 120 countries covering more than 90% of the world’s forests endorsed the Glasgow Leaders’ Declaration on Forests & Land Use committing to work collectively to halt and reverse forest loss and land degradation by 2030, backed by the biggest ever commitment of public funds for forest conservation and a global roadmap to make 75% of forest commodity supply chains sustainable.
- A Just Energy Transition Partnership was announced to support South Africa’s decarbonisation efforts, a powerful example of collaboration between an emerging economy and international partners.
- The launch of the Global Methane Pledge saw over 100 countries committing collectively to reduce global methane emissions by 30% by 2030.”

COP27 Sharm el-Sheikh

COP27 took place in Sharm el-Sheikh, Egypt, from the 6th and the 20th of November 2022. COP27 centred around three major topics:

- Closing the emissions gap to keep the 1.5°C goal alive
- Loss and Damage

➤ Climate Finance

COP27 officially ended on the 18th of November, but due to the nature of negotiations an outcome text and the final press conference was not held until November 20th. The first outcomes of the negotiations of the COP27 agenda were seen in the first draft document. After further discussion, a consolidated final document was produced and, while it removed much of the vague wording of the first draft, it also removed some critical key points, particularly in relation to the strengthening of actions required by developed nations. The most significant outcomes from COP27 are outlined below:

- **Phase down/out language:** The final agreement was delayed due to the stance of China and India, among others, who were not comfortable with the ‘phase out’ of coal wording in the draft text. This led to the watering down of this commitment to a ‘phase down’ of coal use. The hope was that COP27 would work to include further language on coal and fossil fuel reduction efforts. However, the wider commitment to phase out all fossil fuels, led by India, and backed by the US and the EU, was taken out and can be marked as the biggest disappointment of COP27.
- **1.5°C Pathway:** The 1.5°C warming limit has been retained. It gives key political signals that the phase down of all fossil fuels is happening.
- **Climate Finance & Loss and Damage:** An initiative known as the Global Shield Against Climate Risk (GSACR) was launched by the V20 and G7. The intention of this initiative has been framed as an insurance policy backed by the World Bank to prepare and protect those most vulnerable to climate change disasters.

COP28 Dubai

COP28 took place in Dubai, United Arab Emirates was held from the 30th of November until the 13th December 2023. The Conference recognised the urgent need to reduce GHG emissions and emphasised the importance of mitigating climate change. The agreement reached at the COP provided a significant boost to renewable energy industries and set the stage for countries to prioritise clean and sustainable energy generation. By committing to this transition, the international community took a crucial step towards addressing climate change and creating a more sustainable future. Key actions arising from COP28 include:

- Adoption of enhanced climate commitments and targets by participating countries, aimed at limiting global temperature rise to 1.5 degrees Celsius above pre-industrial levels.
- Development of mechanisms and strategies for implementing these commitments, including the mobilisation of financial resources to support developing nations in their climate mitigation and adaptation efforts.
- Advancing the implementation of the Paris Agreement, with a focus on transparency, accountability, and reporting of progress.
- Accelerating the global transition to clean, renewable energy sources and phasing out fossil fuel subsidies.
- Promoting nature-based solutions and conservation efforts to mitigate climate change and preserve biodiversity.
- Addressing the impacts of climate change, such as adaptation measures for vulnerable communities and sectors.
- Collaborating on international climate finance mechanisms, carbon pricing, and technology transfer to support climate action globally.
- Strengthening international partnerships and cooperation to foster shared responsibility and collective action in addressing climate change.

The final COP28 text includes a pledge whereby signatory countries commit to work together to triple the world’s installed renewable energy generation capacity to at least 11,000GW by 2030, taking into consideration different starting points and national circumstances.

COP29 Baku

COP29 took place in Baku, Azerbaijan between the 11th and 22nd of November 2024. There was a central focus on climate financing with agreements being reached on tripling finance to developing countries to help them protect their people and economies from climate-related disasters and sharing the benefits of the boom in renewable energy. Key actions arising from COP29 include:

- Launch of the COP29 Global Energy Storage and Grids Pledge which commits signatories to a collective goal of deploying 1,500GW of energy storage globally by 2030.
- COP29 Green Energy Pledge: Green Energy Zones and Corridors which promotes the connection of green energy zones and corridors to communities in need through the development of intraregional and interregional interconnected electricity grids.
- Call to action for an equitable and renewable energy transition and increased renewable energy capacity globally.

Progress was also made on carbon markets and how they will operate under the Paris Agreement. Article 6 of the Paris Agreement allows countries to trade carbon credits, which are produced through reducing GHG emissions, to support other countries to meet their climate goals. Country-to-country trading and a carbon-crediting mechanism have been made fully operational through agreements at COP29.

COP30 Belém

COP30 took place in Belém, Brazil between the 10th and 21st of November 2025, marking the first UN climate summit hosted within the Amazon region. It was framed as the “Implementation COP”, progressing the post-Paris Agreement framework from pledges to delivery after the first Global Stocktake (GST-1). Key actions arising from COP30 include:

- Launch of the ‘Global Implementation Accelerator’, a voluntary initiative designed to support rapid, high-impact interventions. It creates a structured space for countries to receive technical support, identify barriers, and coordinate investment strategies. Its remit covers a wide spectrum of mitigation and adaptation priority areas, including renewable energy deployment, battery storage, methane reduction, digital grid management, and crucial nature-based interventions.
- Through the Belém Package, Parties committed to accelerating “*zero- and low-emission technologies*” in hard-to-abate sectors such as industry, transport and power.
- COP 30’s redefined Action Agenda included 117 ‘Plans to Accelerate Solutions’ (PAS) across sectors, many of which target low-carbon energy, industrial decarbonization, and clean system deployment.
- COP30 set a long-term ambition to mobilise USD 1.3 trillion annually by 2035 for climate action. This finance is intended to help scale clean energy infrastructure (such as renewables, storage and grid infrastructure), support adaptation, and enable just transitions.

COP30 made strong progress on tools, mechanisms and political momentum for scaling renewable energy, improving efficiency and enabling just transitions. However, the inability to deliver a clear, binding fossil fuel phase-out remains a major barrier to aligning global energy systems with the 1.5°C pathway.

European Green Deal – European Climate Law (2021)

The European Green Deal, initially introduced by the European Commission in December 2019, sets out the ‘blueprint’ for a transformational change of the 27-country bloc from a high- to a low-carbon

economy, without reducing prosperity and while improving people's quality of life, through cleaner air and water, better health and a thriving natural world.

The European Green Deal is intended to work through a framework of regulation and legislation setting clear overarching targets, e.g. a bloc-wide goal of net-zero carbon emissions by 2050 and a 55% cut in emissions by 2030 (compared with 1990 levels). This is a substantial increase compared to the previous target of at least 40% (2030 Climate & Energy Framework), and furthermore, these targets demonstrate the ambition necessary to keep the global temperature increase to well below 2°C and pursue efforts to keep it to 1.5°C as per the Paris Agreement. With regard to the energy sector, the European Green Deal focuses on 3 no. key principles for the clean energy transition, which will help reduce GHG emissions and enhance the quality of life for citizens:

1. *Ensuring a secure and affordable EU energy supply;*
2. *Developing a fully integrated, interconnected and digitalised EU energy market; and*
3. *Prioritising energy efficiency, improving the energy performance of our buildings and developing a power sector based largely on renewable sources (e.g. the Proposed Project).*

The European Climate Law⁹ writes into law the objectives set out above in the European Green Deal for Europe's economy and society to become climate-neutral by 2050. Climate neutrality by 2050 means achieving net-zero GHG emissions for EU countries as a whole, mainly by cutting emissions, investing in green technologies and protecting the natural environment. The European Climate Law includes:

- A legal objective for the EU to reach climate neutrality by 2050;
- An ambitious 2030 climate target of at least 55% reduction of net emissions of GHGs as compared to 1990, with clarity on the contribution of emission reductions and removals;
- A process for setting a 2040 climate target, taking into account an indicative GHG budget for 2030-2050 to be published by the Commission;
- A commitment to negative emissions after 2050;
- The establishment of European Scientific Advisory Board on Climate Change, that will provide independent scientific advice;
- Stronger provisions on adaptation to climate change; and
- Strong coherence across EU policies with the climate neutrality objective.

The law aims to ensure that all EU policies contribute to this goal and that all sectors of the economy and society play their part. All 27 no. EU Member States have committed to turning the EU into the first climate-neutral continent by 2050. One third of the 1.8 trillion-euro investments from the Next Generation EU Recovery Plan and the EU's seven-year budget, will finance the European Green Deal. On 14th July 2021, the European Commission adopted a set of proposals¹⁰ to make the EU's climate, energy, transport and taxation policies fit for reducing net GHG emissions by at least 55% by 2030, compared to 1990 levels.

Achieving these emission reductions in the next decade, which is crucial to Europe becoming the world's first climate-neutral continent by 2050, will only be achieved through the permitting and construction of renewable energy projects, such as the Proposed Project.

2.2.1.1 Project Compliance with International Climate Policy

Based on a review of key international climate policy documents, it is clear that the Proposed Project will contribute to reducing dependence on fossil fuels for electricity generation. This move supports the

⁹ European Climate Law was published in the Official Journal on 9th July 2021 and came into force on 29th July 2021.

¹⁰ 'Fit for 55': delivering the EU's 2030 Climate Target on the way to climate neutrality (July 2021)

objectives of the UNFCCC to limit global temperature increases driven by climate change, as well as the goals set out in the Kyoto Protocol and various COP agreements outlined above. By making a just transition to more renewable forms of electricity generation, the level of carbon emissions will drop as our reliance on non-renewable forms of energy lessen.

The Proposed Project is also considered to be in line with the European Green Deal and European Climate Law, which also aim to reduce carbon emissions and achieve net-zero carbon emissions by 2050. These goals are not likely to be met if projects, such as Proposed Project, are not implemented. The construction of this renewable energy development would also aid in ensuring energy security within the EU which is a target of the European Green Deal. As wind is an indigenous and abundant resource, countries can tap into their own wind potential, reducing vulnerability to price fluctuations and geopolitical risks associated with fossil fuel imports.

2.2.2 National Climate Change Policy

Programme for Government – Securing’s Ireland’s Future (January 2025)

The Programme for Government 2025 – Securing Ireland’s Future (January 2025) places specific emphasis on climate change, recognising that time is critical in addressing the climate crisis. The Programme states that the Government is committed to taking *“decisive action to radically reduce our reliance on fossil fuels and to achieve a 51% reduction in emissions from 2018 to 2030, and to achieving net-zero emissions no later than 2050”*.

The Programme states that the next ten years will be a critical period in addressing the climate crisis, and therefore, a deliberate and swift approach to reducing more than half of Ireland’s carbon emissions over the course of the decade (2020-2030) must be implemented. The programme states that the Government are committed to reducing GHG emissions by an average 7% per annum over the next decade in a push to achieve net-zero emissions by the year 2050.

With regard to renewable energy generation, the Programme notes that the Government is committed to the rapid decarbonisation of the energy sector. The Programme states the Government’s ongoing support and commitment to take *“the necessary action to deliver at least 70% renewable electricity by 2030”*. This target has been updated by subsequent Climate Action Plans.

Climate Action and Low Carbon Development (Amendment) Act 2015 (as amended)

The Climate Action and Low Carbon Development Act 2015 (as amended) (‘the Climate Act’) establishes a legislative precedent to reduce Ireland’s carbon emissions. The Climate Act legally binds Ireland to achieve net-zero emissions no later than 2050, and to a 51% reduction in emissions by the end of this decade.

The Climate Act also incorporates the following key provisions:

- Embeds the process of setting binding and ambitious emissions-reductions targets in law;
- Provides for a national climate objective, which commits to pursue and achieve no later than 2050, the transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy;
- Provides that the first two five-year carbon budgets proposed by the Climate Change Advisory Council should equate to a total reduction of 51% over the period to 2030, relative to a baseline of 2018;
- The role of the Climate Change Advisory Council has been strengthened;
- The government must adopt carbon budgets that are consistent with the Paris agreement and other international obligations;

- Actions for each sector will be detailed in the Climate Action Plan which must be updated annually; and
- Local Authorities must prepare individual Climate Action Plans which will include both mitigation and adaptation measures and will be updated every five years.

Section 15(1) below places an obligation on public bodies to exercise their functions in favour of climate concerns when making decisions, unless it is objectively impracticable to do so.

“A relevant body shall, in so far as practicable, perform its functions in a manner consistent with:

- a) the most recent approved climate action plan,*
- a) the most recent approved national long term climate action strategy,*
- b) the most recent approved national adaptation framework and approved sectoral adaptation plans,*
- c) the furtherance of the national climate objective, and*
- d) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.”*

The most recent Climate Action Plan (CAP 25), the most recent long term climate action strategy (Ireland’s Long-term Strategy on Greenhouse Gas Emissions Reduction 2024) and the furtherance of the national climate objective, with which Consenting Authority’s decisions must be consistent, all support the development of onshore wind energy in accordance with proper planning and sustainable development.

The implications for public bodies in exercising their functions in accordance with Section 15 of the Climate Act has been scrutinised by the Irish legal system. The legal analysis of Section 15 has arisen from a challenge to a decision of the Commission to refuse planning permission for a wind farm in County Laois.

The Supreme Court issued a judgment on this matter on 4th February 2026 (Coolglass Wind Farm Limited v An Coimisiún Pleanála [2026] IESC 5) and which establishes that consenting authorities must make decisions in a manner ‘consistent with’ the approved national long term climate action strategy, the approved national long term climate action strategy etc., ‘in so far as is practicable’. This means that departure from climate objectives is permissible but only where there are genuine practical difficulties that make full alignment impracticable.

Consenting Authorities, in making a decision on this application, must meaningfully engage with national climate objectives when exercising their decision-making functions. Consenting Authorities, must also ensure that their decision on an application falls within a spectrum of outcomes which can be considered to be consistent with, in so far as practicable, national climate objectives.

Carbon Budgets

The first national carbon budget programme proposed by the CCAC, approved by Government and adopted by both Houses of the Oireachtas in April 2022 comprises three successive 5-year carbon budgets¹¹. The total emissions allowed under each budget are shown in Table 2-1 below.

¹¹ Climate Change Advisory Council Carbon Budget Technical Report (October 2021)
<https://www.gov.ie/en/publication/9af1bcarbon-budgets/>

Table 2-1 Carbon Budgets of the Climate Change Advisory Council

	2021 – 2025 Carbon Budget 1	2026 – 2030 Carbon Budget 2	2031 – 2035 Provisional Carbon Budget 3
	All Gases		
Carbon Budget (Mt CO ₂ eq)	295	200	151
Annual Average Percentage Change in Emissions	-4.8%	-8.3%	-3.5%
The Figures are consistent with emissions in 2018 of 68.3 Mt CO ₂ eq reducing to 33.5 Mt CO ₂ eq in 2030, thus allowing compliance with the 51% emissions reduction target by 2030.			

Section 6C of the Climate Act provides that the Minister shall prepare, within the limits of the carbon budget, the Sectoral Emissions Ceilings. These ceilings set out the maximum amount of GHG emissions that are permitted in each sector. The Government approved Sectoral Emissions Ceilings on 28 July 2022. The electricity sector is allocated a sectoral ceiling of 40 MtCO₂eq for the first budget (2021-2025) and a sectoral ceiling of 20 MtCO₂eq for the second budget period (2026-2030). In 2024, electricity sector emissions were reported to be 6.3 MtCO₂eq¹².

The Environmental Protection Agency (EPA) reported in May 2024¹³ that the first two carbon budgets (2021-2030) – which aim to support achievement of the 51% emissions reduction target - would not be met, and by a significant margin of between 17 and 27%. The data indicates that from 2021- 2023 Ireland has used 64% (188.4 MtCO₂eq) of the 295 MtCO₂eq Carbon Budget for the five-year period 2021-2025. Thus, indicating that only 36% of the budget was available for 2024 and 2025. To stay within budget in the first carbon budget period, emissions would need to reduce by 8% annually¹⁴. Section 6D – paragraph 5 – of the Climate Act states that non-achievement of the first carbon budget would see the excess emissions carried forward into the second budget period and the second carbon budget would be reduced by that amount. Were this to occur, it would make achievement of the second budget substantially more difficult.

Report of the Joint Committee on Climate Action - Climate Change: A Cross-Party Consensus for Action (2019)

In March 2019, the Joint Committee on Climate Action Change released a report detailing a cross-party consensus for action. In 2019 there was already a concern that Ireland’s performance in meeting international and national obligations was inadequate, and concerns remained regarding emission projections and the ability to meet 2030 targets under relevant EU Directives.

The report states that a transformation of Ireland’s energy system will be required for the country to meet its future 2030 and 2050 GHG emission targets; specifically, in order to reach net-zero emissions by 2050, Ireland will be required to fully decarbonise its electricity generation. Therefore, there is a clear incentive for developing, and safeguarding, Ireland’s capacity in renewable energies and renewable electricity. Since this report was published, the Climate Act has been enacted and there have

¹² Climate Change Advisory Council Annual Review 2025 (April, 2025)

<https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR2025-Electricity-FINAL.pdf>

¹³ <https://www.epa.ie/news-releases/news-releases-2024/ireland-is-projected-to-exceed-its-national-and-eu-climate-targets.php>

¹⁴ EPA (2024) Irelands Provisional Greenhouse Gas Emissions 1990-2023 <https://www.epa.ie/publications/monitoring-assessment/climate-change/air-emissions/EPA-Provisional-GHG-Report-Jul24-v6.pdf>

been recent progress / future scenario assessments (e.g., EirGrid’s ‘All Island Generation Capacity Statement 2022 – 2031’ (October 2022)).

Given the clear concern that the county’s future emissions targets may be missed, it is crucial that projects, such as the Proposed Project, which can contribute in a meaningful manner towards climate change targets, and which can be provided without significant adverse environmental effects arising, are brought forward and supported with favourable consideration through the planning system and are constructed.

Climate Action Plan 2023

The Climate Action Plan 2023 (‘CAP23’) was published in December 2022 by the Department of the Environment, Climate and Communications (DECC). This outlines the actions required up to 2035 and beyond to meet Ireland’s commitment to becoming carbon neutral by 2050. CAP23 sets out a roadmap to deliver on Ireland’s climate ambition and is aligned to ensure that Ireland achieves its legally binding target (the Climate Act) of net-zero GHG emissions no later than 2050.

A target aims for a reduction in emissions of 51% over the period 2018 to 2030 and, in doing so, to prevent/mitigate the potentially devastating consequences of climate change on Ireland’s environment, society, economy and natural resources. CAP23 states that to do so, Ireland must harness the untapped indigenous renewable resources and has a target of achieving 80% of energy being produced from renewable sources by 2030 (unchanged from the previous Climate Action Plan, 2022) with a target of 9GW of that being produced by onshore wind. Measures set out in CAP23 to achieve these targets include to ‘*accelerate and increase the deployment of renewable energy to replace fossil fuels*’ (Section 12.1.4 of CAP23). It is clear from the message and ambition of CAP23 that the drive to deploy renewable energy projects such as the Proposed Project in Ireland are critical to achieving the aims and objectives of CAP23 including the 9GW of onshore wind energy by 2030 and carbon neutrality by 2050.

“Achieving these ambitions will require a coordinated effort across Ireland and every economic sector will be involved. It requires no less than a national transformation over the coming years in how we work, travel, heat our homes, source our energy and use our land”

Decarbonisation of the electricity sector is, as noted in CAP23, key to the decarbonisation of other sectors who will depend on electrification including transport, heating and industry. The increase in the portion of renewable electricity of 80% by 2030 will come in part from a targeted 9GW of onshore wind. CAP23 notes:

“Achieving further emissions reductions between now and 2030 requires a major step up in how we accelerate and increase the deployment of renewable energy to replace fossil fuels, deliver a flexible system to support renewables, and manage electricity demand”.

Chapter 12 of CAP23 sets out the state of play, targets and actions for the decarbonisation of the electricity sector. Carbon emissions from electricity have fallen by 45% between 2005 and 2020, falling by 19% between 2005-2012 and by 33% between 2012 and 2020. This trend is largely due to the availability of renewable energy generated electricity (a sixfold increase between 2005 and 2020) and an associated reduction in the use of carbon heavy fuels such as peat and coal.

Due to the scale of the challenge, and the recognition of central role of the electricity sector in achieving sector wide targets, the electricity sector has been allocated the smallest carbon budget and will require the steepest carbon emissions decline of all sectors – namely a reduction in carbon emission by -75% relative to 2018 baseline. Carbon budgets 1 and 2 allow for 40.02 MtCO₂eq from the electricity sector up to 2025 and 20 MtCO₂eq from 2026-2030. This means an average of 8 MtCO₂eq per annum. Emissions for the period 2021 were 9.98 MtCO₂eq, which is in exceedance of 8 MtCO₂eq, which means that to keep on track, electricity will now have to achieve annual emissions of c. 7.5 MtCO₂eq from 2022 to 2025. The measures set out for electricity sector include *inter alia*:

- Reduce annual CO₂eq. emissions from the sector to 3 MtCO₂eq by 2031 (75% reduction compared to 2018);
- Accelerate and increase the deployment of renewable energy to replace fossil fuels;
- Accelerate the delivery of onshore wind, offshore wind and solar through a competitive framework to reach 80% of electricity demand from renewable energy by 2030;
- Target 6 GW of onshore wind and up to 5 GW of solar by 2025;
- Target 9 GW onshore wind, 8 GW Solar and at least 5 GW of offshore wind by 2030;
- Align the relevant constituent elements of the planning and permitting system to support accelerated renewable energy development, supported by national policy and associated methodologies to inform regional and local planning policies, noting that county development plans are obliged to set out objectives to facilitate energy infrastructure.

Having regard to the targets and measures set out above, it is evident that there is strong policy support for the provision of additional renewable energy generators, such as the Proposed Project.

Climate Action Plan 2024

The Climate Action Plan 2024 ('CAP24') builds on CAP23 by refining and updating the status of the actions required to deliver the decarbonisation required under the carbon budgets and sectoral emissions ceilings. The renewable electricity generation targets are unchanged from the CAP23 (9GW of onshore wind and 80% renewable electricity share).

CAP24 includes the latest trends in the electricity sector:

- In 2022, renewable generation accounted for 38.6% of electricity, an increase from 35% in 2021.
- Electricity accounted for 14.4% of Ireland's GHG emissions in 2022.
- To meet the first carbon budget the electricity sector requires a decarbonisation rate of 17.3% per annum in the period 2023-2025. For context, the decarbonisation rate between 2018 and 2022 was 1.4% per annum.

CAP24 acknowledges the urgency and importance of the decarbonising of the electricity sector. The plan states:

“Given that the programme of large-scale offshore wind deployment is expected to be realised towards end decade, deployment rates for onshore renewables will need to increase to match demand growth to ensure we keep electricity emissions within range of the carbon budgets. This requires a major upscaling and accelerating in current deployment of renewables, particularly onshore wind.”

The scale of the challenge is apparent when quantified:

*“As an example, the historical average deployment of onshore wind installed capacity connected between 2008 and 2020 inclusive was 280 MW per annum from 19 projects (with an annual maximum of 612 MW). To achieve the necessary emissions abatement, an approximately eight times increase of renewable energy deployment to **2.3 GW annually** would be needed between **2024 and 2030.**”* (emphasis added)

CAP24 identifies the alignment of local and national policy as critical to accelerate renewable energy rollout:

“greater alignment between local plans and renewable energy targets at national and regional level to support investment in and delivery of onshore wind and solar renewable energy is also critical.”

Having regard to the targets and measures set out above, it is clear that there is strong policy support for the provision of additional renewable energy generators, such as the Proposed Project.

Climate Action Plan 2025

The Climate Action Plan 2025 (CAP25) represents the third statutory update to Ireland’s climate roadmap under the Climate Act. Building on the foundations laid by previous plans, CAP25 refines and strengthens the strategies necessary to deliver Ireland’s legally binding carbon budgets and sectoral emissions ceilings. It sets out a clear trajectory to reduce greenhouse gas emissions by 51% by 2030 and to achieve climate neutrality no later than 2050.

A cornerstone of CAP25 is the decarbonisation of Ireland’s electricity system through a substantial increase in renewable energy generation. The plan reaffirms ambitious targets for renewable electricity share which includes 80% by 2030, and 50% by 2025. This is to be achieved through the accelerated deployment of onshore wind (2 GW by 2025; 9 GW by 2030), offshore wind (8 GW by 2030), and solar energy (up to 5 GW by 2025; 8 GW by 2030).

CAP25 recognises that *“A renewables-led system is at the core of Ireland’s plan to radically reduce emissions in the electricity sector, protect our energy security, and ensure our economic competitiveness. This requires the accelerated and increased deployment of new renewable electricity generation capacity and related infrastructure.”*

CAP25 also lays emphasis on the importance of aligning local and national policies to accelerate the rollout of renewable energy.:

“The Planning and Development Act, 2024, the Renewable Energy Directive and the revised NPF together will ensure greater alignment between national, regional, and local authority levels to deliver on the renewable electricity ambition.

The draft first revision of the NPF includes policy support for the development and upgrading of electricity grid infrastructure, the delivery of renewable electricity generation capacity, and the introduction of regional renewable electricity capacity allocations for each of the three Regional Assemblies by 2030”

CAP25 sets out a clear roadmap to achieve Ireland's climate ambition, including specific 2030 targets and decarbonization objectives. This roadmap provides strong policy support for the provision of additional renewable energy generators, such as the Proposed Project, to reach these targets.

2.2.2.1 Project Compliance with National Climate Policy

The Proposed Project aligns with the national climate policy objectives. The Proposed Project will make a significant contribution to achieving the CAP25 target of 9GW of onshore wind energy by the year 2030. Furthermore, the Proposed Project will aid Ireland in adhering to, or limiting the exceedance of, the country's carbon budgets. Currently, the electricity sector is rapidly approaching the designated sectoral ceiling of 40 MtCO₂eq for the first carbon budget period from 2020 to 2025. The national renewable energy targets and the carbon budgets are integral to the government’s response to the climate crisis.

2.3 Renewable Energy Policy and Targets

This section of the EIAR provides a breakdown of international and national renewable energy policy with regard to the Proposed Project. Under this section, the following are discussed:

- EU Renewable Energy Policy
- National Renewable Energy Policy

National policy has developed in line with European and international policies, targets and commitments, in that the importance and urgency of decarbonising the energy generation sector, the economy in general and reducing GHG emissions has become increasingly more apparent.

The Proposed Project complies with the nationally stated need to provide a greater amount of renewable energy onto the national grid and will further reduce the national reliance on fossil fuels for electricity generation.

2.3.1 European Renewable Energy Policy

Renewable Energy Directive

The Renewable Energy Directive ('RED') is the EU legal framework for the development of renewable energy across all sectors of the EU economy, supporting clean energy cooperation across EU countries. Since the introduction of the RED in 2009, it has undergone several revisions, the most recent of which occurred in November 2023. Since its adoption in 2009, the share of renewable energy sources in energy consumption has increased from 12.5% in 2010 to 23% in 2022¹⁵. Of the 27 EU member states, the lowest proportion of renewable energy generation was recorded in Ireland (13.1%). Crucially, the RED sets the overall target for renewable energy in the EU.

RED I – 2009

Renewable Energy Directive 2009 (RED I - the original RED) (2009/28/EC), adopted in 2009, set binding targets for EU member states to achieve a 20% share of renewable energy in final energy consumption by 2020. It established a framework for national renewable energy action plans, sustainability criteria for biofuels and bioliquids, and a system of guarantees of origin for renewable energy.

RED II – 2018

RED II, the first major amendment to the RED, (2018/2001/EU) entered into force in December 2018, as part of the Clean Energy for all Europeans packages. In RED II, the overall EU target for Renewable Energy Sources consumption by 2030 was raised to 32%.

RED III – 2023

In November 2023, a revision of the Renewable Energy Directive¹⁶ (RED III), came into force. RED III increases the EU wide renewable energy target from 32% set under the previous revision of the directive to 42.5%, with an ambition to reach 45% by 2030. The increase was proposed under the publication of REPowerEU plan in May 2022. RED III also introduces specific targets for Member States in the industry, transport, and building (district heating and cooling) sectors.

Under Article 15c of RED III, EU member states must identify 'Renewables Acceleration Areas' of where projects will undergo a simplified and fast-track procedure. RED III defines the timeframes for the permit-granting procedure. In Renewables Acceleration Areas, the permit-granting procedure shall not exceed 12 months for renewable energy projects and outside renewables acceleration areas the permit granting procedure shall not exceed two years.

Central to RED III is the presumption that renewable energy development must be considered to be **in the overriding public interest** when addressing competing interests under the Habitats Directive (92/43/EEC), Birds Directive (2009/147/EEC) and the Water Framework Directive (2000/60/EC). The

¹⁵ <https://ec.europa.eu/eurostat/en/web/products-eurostat-news/w/ddn-20231222-2>

¹⁶ Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (recast)

recognition of renewable energy projects being in the ‘*overriding public interest*’ was originally introduced under Article 3(1) of emergency Regulation 2022/2577 of 22nd December 2022 named ‘*laying down a framework to accelerate the deployment of renewable energy*’ in response to REPowerEU which found that the permitting process is the biggest bottleneck for deploying wind at scale, with approximately 80 GW of wind power capacity stuck in permitting procedures across Europe.

Article 16f of RED III states:

‘By 21 February 2024, until climate neutrality is achieved, Member States shall ensure that, in the permit granting procedure, the planning, construction and operation of renewable energy plants, the connection of such plants to the grid, the related grid itself, and storage assets are presumed as being in the overriding public interest and serving public health and safety when balancing legal interests in individual cases for the purposes of Article 6(4) and Article 16(1), point (c), of Directive 92/43/EEC, Article 4(7) of Directive 2000/60/EC and Article 9(1), point (a), of Directive 2009/147/EC.’

There is an 18-month period to transpose most of the directive's provisions into national law ending on the 1st of July 2025, with a shorter deadline of July 2024 for some of the provisions related to permitting for renewables. In September 2024, the EU Commission opened infringement proceedings against Ireland for failures in relation to the transposition of permitting procedures. On the 17th of July 2025, the EU decided to send a ‘reasoned opinion’, a formal request to comply with EU law, giving Ireland two months to respond and take the necessary measures to complete the transposition. In August 2025, some of the provisions of RED III were transposed into national law through the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. No. 274 of 2025). This legislation was adopted for the purpose of giving effect to Articles 15e(5), 16, 16b, 16c(2), 16d, 16e and 16f of the RED III Directive.

The legislation introduces new decision timelines based on a “completeness check” (ss.34E, 37JB, 295B): 52 weeks for new wind farms, 30 weeks for repowering projects, and one to two years for IROPI cases (two years for projects over 150 kW, one year for projects under 150 kW or repowering). Importantly, renewable energy developments, including related grid and storage infrastructure, are now presumed to be in the **overriding public interest**.

Energy Roadmap 2050

The Energy Roadmap 2050 was published by the European Commission in 2011 and analyses the transition of the contemporary energy system in ways that would be compatible with the GHG reductions targets as set out in the RED (Directive 2009/28/EC) while also increasing competitiveness and security of supply. To achieve these targets and objectives, the Roadmap states that significant investments will need to be made in new low-carbon technologies and renewable energy, e.g., wind energy infrastructure, energy efficiency and grid infrastructure. Five main routes are identified to achieving a more sustainable, competitive and secure energy system in 2050:

- High Energy Efficiency;
- Diversified Supply Technologies;
- High Renewable Energy Sources;
- Nuclear energy; and
- Carbon capture and storage.

The analysis found that decarbonising the energy system is technically and economically feasible. The Roadmap notes that all scenarios show the biggest share of energy supply technologies in 2050 comes from renewables.

As such, a major prerequisite for a more sustainable and secure energy system is a higher share of renewable energy up to and beyond 2030 to 2050. Each of the scenarios assumes in the analysis that

increasing the share of renewable energy and using energy more efficiently are crucial, irrespective of the particular energy mix chosen.

The Proposed Project will aid in achieving the scenarios set out in the Energy Roadmap 2050, by increasing the share of renewable energy being produced onto the national grid thereby reducing the reliance on more unsustainable forms of electricity production.

REPowerEU

REPowerEU, launched in May 2022 by the European Commission, proposes an outline of a plan to make Europe independent from Russian fossil fuels, starting with gas, due to the high and volatile energy prices, and security of supply concerns following Russia's unprecedented military attack on Ukraine. Currently, the EU imports 90% of its gas consumption, with Russia providing around 45% of those inputs. Russia also accounts for around 25% of oil and 45% of coal imports. Phasing out dependence on fossil fuels can be done well before 2030, increasing the resilience of the EU-wide energy system based on two pillars:

1. *Diversifying gas supplies, via higher Liquefied Natural Gas (LNG) and pipeline imports of biomethane and renewable hydrogen production and imports from non-Russian suppliers.*
2. *Reducing faster the use of fossil fuels by boosting energy efficiency, increasing renewables and addressing infrastructure bottlenecks.*

In September 2023, the European Parliament agreed to update the RED. The updates including raising the share of renewables in the EU's final energy consumption to 42.5% by 2030 with Member States encouraged to achieve 45% and a more efficient approval procedure for deploying renewables in Europe. In addition, as a part of the REPowerEU Plan, the European Commission has proposed a series of additional targeted amendments to the renewable energy directive to reflect the ongoing changes in the energy landscape and the continued invasion of Ukraine. This will make the sector more efficient and reach the set goals faster.

In addition, the REPowerEU Plan highlights the overriding public interest in achieving renewable energy targets. The REPowerEU Plan states that: "*the revised proposal operationalises the principle of renewable energy as an overriding public interest*, introduces the designation of *'go-to' areas* and other ways to shorten and simplify permitting while also minimising potential risks and negative impacts on the environment". This highlights the importance of public interest and incentive to achieve the renewable energy target, highlighting the importance of appropriate designation of sufficient areas for wind energy development by local authorities within the EU.

2.3.1.1 Project Compliance with EU Policy

The Proposed Project is fully aligned with, and supported by, relevant EU energy and climate policy. It will contribute to the objectives of the 2030 Climate and Energy Framework, including the EU-wide binding targets of achieving at least 27% renewable energy and 27% energy efficiency by 2030. Additionally, the Proposed Project supports the increased ambition to raise the share of renewables in the EU's energy mix from 32% to a minimum of 42.5% by 2030.

The EU Energy Roadmap 2050, which outlines pathways to meet long-term climate and energy goals, highlights that all projected scenarios foresee renewables as the dominant source of energy supply by 2050. As such, the Proposed Project aligns with this long-term vision.

Regulation 2022/2577 introduced significant measures to facilitate the acceleration of the deployment of renewable energy, including an obligation on member states to prioritise the roll out of renewable energy projects when balancing competing legal interests. Furthermore, the REPowerEU plan, which aims to enhance energy security and accelerate the integration of renewables into the EU grid, explicitly

calls for faster permitting processes for renewable projects and improvements to grid infrastructure. The Proposed Project directly supports these objectives and is therefore considered to be strongly underpinned by current EU energy policy.

The provisions of Regulation 2022/2577 and the REPowerEU Plan are applicable to the current planning application and EIAR, and they provide further justification for granting consent for the Proposed Project.

2.3.2

National Renewable Energy Policy

White Paper on 'Ireland's Transition to a Low Carbon Energy Future' 2015 – 2030

On 12th May 2014, the Green Paper on Energy Policy in Ireland was launched which marked the start of a public consultation process on the future of Ireland's energy policy over the medium to long-term. The then Department of Communications, Climate Action & Environment (DCCAE) acknowledged that energy is an integral part of Ireland's economic and social landscape and that *“a secure, sustainable and competitive energy sector is central to Ireland's ability to attract and retain Foreign Direct Investment and sustain Irish enterprise. The three key pillars of energy policy are to focus on security, sustainability and competitiveness”*.

Following an extensive consultation process, the Government published the White Paper 'Ireland's Transition to a Low Carbon Energy Future 2015–2030' in December 2015. This document, produced by the then Department of Communications, Energy and Natural Resources (DCENR), provides an updated energy policy framework to guide Ireland's transition to a low-carbon energy system through 2030 and towards 2050. It outlines the Energy Vision 2050, which targets an 80–95% reduction in energy sector GHG emissions (compared to 1990 levels), primarily through increased renewable electricity generation and greater use of electricity and bioenergy in heating and transport.

The policy framework was developed to guide policy and actions that the Irish Government intends to take in the energy sector up to 2030 and also reaching out to 2050 to ensure a low-carbon future that maintains Ireland's competitiveness and ensures a supply of affordable energy. The Energy Vision 2050, as established in the White Paper, describes a *'radical transformation'* of Ireland's energy system which will result in GHG emissions from the energy sector reducing by between 80% and 95%, compared to 1990 levels. The paper advises that a range of policy measures will be employed to achieve this vision with emphasis on the generation of electricity from renewable sources, which there are plentiful indigenous supplies and increasing the use of electricity and bio energy to heat homes and fuel transport.

The White Paper highlights onshore wind as Ireland's leading and most cost-effective renewable resource, noting its high efficiency and lower support costs due to the country's strong wind profile. It also recognises the growing competitiveness of solar technology and its potential to enhance energy security, meet renewable targets, and stimulate economic growth.

“Onshore wind continues to be the main contributor (18.2% of total generation and 81% of RES-E in 2014). It is a proven technology and Ireland's abundant wind resource means that a wind generator in Ireland generates more electricity than similar installations in other countries. This results in a lower cost of support.”

National Energy Security Framework

The National Energy Security Framework (DECC, April 2022) highlights clearly the impacts the Russian invasion of Ukraine and the resulting war has had on Europe's energy system. The resulting decision by the European Union to phase out the import of Russian gas, oil and coal (REPowerEU) has brought to the fore the importance of security of supply and how energy policy is designed for long-term resilience. It takes account of the need to decarbonise society and economy, to reduce Ireland's

emissions by 51% over the decade to 2030 and reach net-zero emissions by 2050. According to the Sustainable Energy Authority of Ireland's (SEAI) Energy in Ireland (2025) report, oil accounted for almost 49% of Ireland's primary energy requirement in 2024, making it one of the highest rates of oil dependency in the EU. The International Energy Agency (IEA), of which Ireland is a member country, includes a 10-point plan to cut oil use which calls for an acceleration in the deployment of wind and solar projects. Ireland's response per the Framework is set out over three themes:

- Theme 1 – managing the impact on consumers and businesses
- Theme 2 – ensuring security of energy supply in the near-term
- Theme 3 – reducing our dependency on imported fossil fuels in the context of the phasing out of Russian energy imports across the EU

In relation to theme 3, the Framework highlights that replacing fossil fuels with renewables, including wind energy, will be a focus area of work. The Framework calls for *“Supportive policies across Government and State agencies”* which *“can reduce barriers and fast track permitting for renewable energy generation projects. Similarly, renewable energy developers need to match this through taking a leadership role in delivering high quality applications to relevant consenting authorities, meeting project milestones on time and minimising delays”*. There is a number of 'Responses' set out in the Framework aimed at reducing reliance on imported fossil fuels and increasing indigenous renewable energy generation, including Response 25 which seeks the alignment of all elements of the planning system to support accelerated renewable energy development.

The Government published an update to this in November 2023 which outlines a new strategy to ensure energy security in Ireland for this decade, while ensuring a sustainable transition to a carbon neutral energy system by 2050. The Energy Security Package emphasizes the need to prioritize, monitor, and regularly review energy security during the transition period. It proposes measures focusing on:

1. *Reduced and Responsive Demand.*
2. *Renewables-Led System.*
3. *More Resilient Systems.*
4. *Robust Risk Governance*

The report details mitigation measures under each area, such as expanding indigenous renewable energy capacity, diversifying fuel sources, and enhancing governance structures. Lessons from European energy supply disruptions and domestic electricity sector challenges inform the strategic approach.

Six key pillars guide the response and recommendations outlined in 'Energy Security in Ireland to 2030', which includes a public consultation and external reviews. The Government plans to release follow-up reports every five years, with implementation oversight by the Government's Energy Security Group. Having regard to the above, it is clear that the provision of additional renewable energy generation, such as the Proposed Project is vital in helping to secure the State's energy supplies and reduce reliance on imported fossil fuels.

Energy Security in Ireland to 2030 – Energy Security Package

Published in 2023, the energy security package titled 'Energy Security in Ireland to 2030' builds on the policies set out in the NESF. The energy security package is based on the recognition of the following fact:

“Ireland's future energy will be secure by moving from an oil-, peat-, coal- and gas-based energy system to an electricity-led system maximising our renewable energy potential, flexibility and being integrated into Europe's energy systems.”

Independent research undertaken as part of the package, McCarthy Report¹⁷, provides an analysis of developments in the electricity sector in Ireland. The McCarthy Report makes the following observation in relation to the consenting process:

“The problem of delays encountered by major infrastructure projects, including in the electricity system, due to planning and environmental consent issues was evident. They had been commented upon by the International Energy Agency in its 2019 review of Ireland which named planning delays as the principal challenge to delivery of policy for the sector.”

A key finding from the technical analysis conducted as part of the energy security package is the interdependence of energy security on two essential pillars: ‘*harnessing our indigenous renewable energy resources at speed and at scale and the rapid electrification of energy demand*’. As such, the energy security package provides additional measures to supplement the existing measures introduced under previously published government policy documents. The additional measures most relevant to the Proposed Project is Action 10 which is “*To implement Planning and Consenting System Reforms and provide greater certainty to the sector*”.

The energy security package aims to ensure that the planning system is fully aligned and resourced to fully support accelerated renewable energy development. It also aims to ensure renewable energy projects are prioritised in line with the recast RED and REPowerEU.

The Proposed Project will directly support the government's goal of enhancing national energy security by acting as a domestic source of renewable electricity. By supplying clean energy to the national grid, it will contribute to the transition toward a renewables-driven energy system.

2.3.2.1 Project Compliance with the National Renewable Energy Policy

The National Energy Security Framework outlines several steps to accelerate Ireland's shift to renewable energy initiatives. It is evident that the Proposed Project aligns with this framework by increasing the proportion of renewable energy on the national grid, thus expediting Ireland's transition to a low-carbon energy future.

2.4 Climate and Renewable Energy Target Progress

At a European level, the latest data shows that, as of 2024, 25.2% of energy came from renewable energy sources¹⁸. This represents an increase of 0.8% compared to 2023 levels. While progress is being made to increase the share of renewable energy, it is clear that all EU member states need to intensify their efforts to collectively comply with the target of 42.5% set in the latest revision of the renewable energy directive.

Of the 27 EU member states, Ireland had one of the lowest proportions of renewable energy at 16% in 2024¹⁹. It is evident that Ireland is not performing well when compared against our European counterparts and that urgent action is required to increase the overall share of renewable energy in our gross final energy consumption. When it comes to the share of renewable energy in electricity, Ireland does perform better generating 41.3% in 2024, but still below the EU average of 47.5%²⁰.

¹⁷ <https://www.gov.ie/pdf/?file=https://assets.gov.ie/276441/eb496e01-5c01-4594-af09-74342b4ac971.pdf#page=null>

¹⁸ https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Renewable_energy_statistics

¹⁹ https://ec.europa.eu/eurostat/statistics-explained/index.php?title=File:Renewable_energy_2024_infographic.jpg

²⁰ https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Renewable_energy_statistics

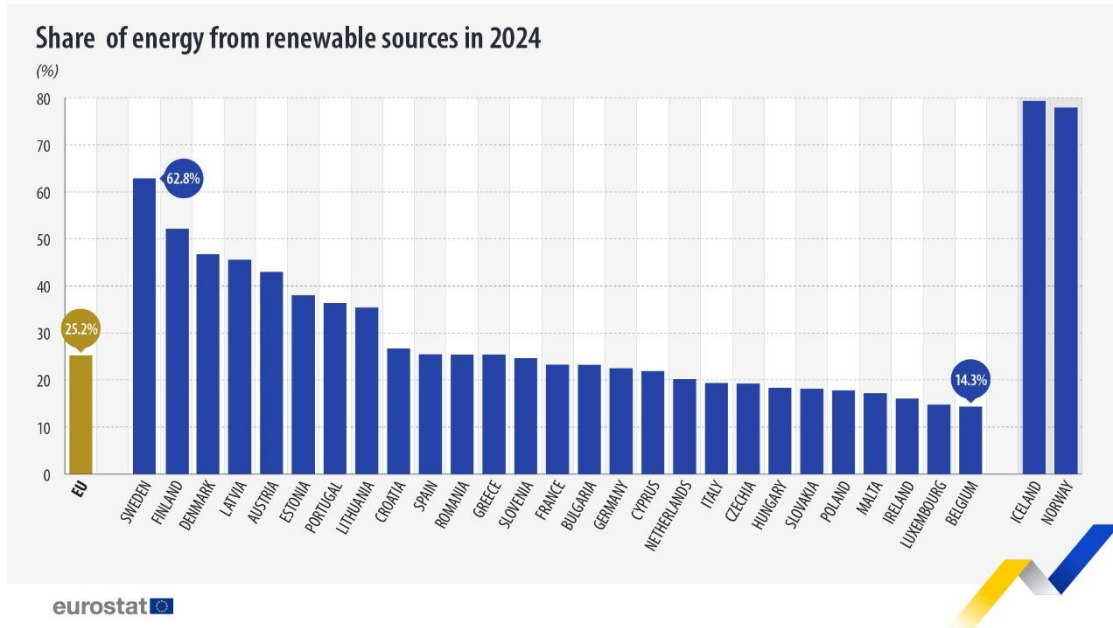


Figure 2-1: Overall share of energy from renewable sources (source: Eurostat)

Ireland’s Greenhouse Gas Emissions Projections 2024-2055 (May 2025)

The EPA publishes Ireland’s Greenhouse Gas Emission Projections and the most recent report, ‘Ireland’s Greenhouse Gas Emissions Projections 2024–2055’ was published in May 2025. The report includes an assessment of Ireland’s progress towards achieving its emission reduction targets out to 2030 set under the EU Effort Sharing Regulation (ESR).

The EPA has produced two scenarios in preparing these GHG emissions projections: a “With Existing Measures” (WEM) scenario and a “With Additional Measures” (WAM) scenario. These scenarios forecast Ireland’s GHG emissions in different ways. The WEM scenario assumes that no additional policies and measures, beyond those already in place by the end of 2023. This is the cut off point for which the latest national GHG emission inventory data is available, known as the ‘base year’ for projections. The WAM scenario has a higher level of ambition and includes the latest government policies and measures (at the time the Projections are compiled) to reduce emissions such as those in Ireland’s CAP25.

The EPA Emission Projections Update notes the following key trends:

- Ireland is not on track to meet the 51% emissions reduction target (by 2030 compared to 2018) based on these projections which include the CAP25 measures. GHG emissions are projected to be 9% to 23% lower by 2030 (compared to 2018), placing Ireland further from the 2030 National climate target when compared to previous assessments.
- Budget period 1, 2021-2025, of 295 Mt CO₂eq is projected to be exceeded by 8 to 12 Mt CO₂eq. Budget period 2, 2026-2030 of 200 Mt CO₂eq is also expected to be exceeded by a significant margin of 77 to 114 Mt CO₂eq (with carryover from Budget period 1).
- Ireland will not meet its non-Emissions Trading Scheme (ETS) EU targets of a 42% emissions reduction by 2030 even with flexibilities applied. The assessment shows a reduction by 13% to 26% by 2030 with the use of flexibilities.
- Sectoral emissions ceilings for 2025 and 2030 are projected to be exceeded by the Buildings, Electricity, Industry and Transport sectors.
- Emissions from the Energy Industries sector are projected to decrease by between 59 and 68%. Renewable energy generation at the end of the decade is projected to range from 60 to 68% of electricity generation.

As decarbonising electricity generation will have a significant positive contribution in achieving Ireland's emissions, it is clear that additional renewable energy production, such as that of the Proposed Project, must be encouraged and supported if carbon-saving targets are to be met.

National Energy Projections (September 2025)

The National Energy Projections report, published by the SEAI in September 2025, sets out the most recent updates to Ireland's progress towards its binding European and national renewable energy targets.

In 2023 RED II set an EU wide target for overall RES of 32% RES in 2030. Member states set their national contributions to the EU-wide target, with Ireland setting its at 34.1% in 2030. RED III increased the binding EU-wide target for overall RES to at least 42.5% with Ireland subsequently increasing the target to 43% in 2030.

The decarbonisation of the electricity generation is critical considering the need to electrify other sectors such as heating and transport in order to achieve the sectoral decarbonisation targets. By 2030, renewable energy sources are anticipated to dominate electricity generation, particularly experiencing a significant surge later in the decade attributed to the integration of substantial offshore wind projects.

The most notable conclusion drawn from the Report is the significant gap between projections across both the With Existing Measures (WEM) and (With Additional Measures) WAM scenarios and the legally binding EU and national emission reductions targets. The Report states that even with full implementation of CAP24, Ireland is projected to face a significant gap in meeting many legally binding energy and climate obligations, including national carbon budgets and sectoral emissions ceilings, and EU obligations on renewable energy, energy efficiency and greenhouse gas emissions.

The SEAI projections explore the risk scenarios WEM and WAM, the aim being to address the gap between current policy trajectories and the most ambitious planned policies scenarios. The SEAI WEM and WAM scenario modelling considers the latest CAP published at the time of policy assumptions for the modelling scenarios (CAP24).

The Report projects GHG emissions under the WEM and WAM scenarios. In the WEM scenario, total greenhouse gas emissions are expected to exceed the carbon budgets for CB1, CB2 and provisional CB3 in 2025, 2029 and 2031, respectively, with a cumulative exceedance of 23% by the end of 2030. In the WAM scenario, cumulative exceedance of 16% is projected by the end of 2030. The projected overall carbon budgets exceedance has reduced from the 2024 projections, though there are still significant risks that this could increase again subject to market changes and the pace of implementation of policy.

Energy in Ireland (December 2024)

In December 2025, the SEAI released an annual publication '*Energy in Ireland*' report which looks at trends in national energy use and at the underlying driving forces, such as the economy and weather, and more recently the impacts of high energy prices. It also examines GHG emissions from energy use, energy security, cost competitiveness, and Ireland's progress towards EU renewable energy targets.

The Report identifies that Ireland's national energy-related emissions in 2024 were at their lowest level in over 30 years. Energy-related emissions in 2024 were 30.9MtCO₂eq, down 1.5% on 2023 levels. Energy-related emissions were 6.9MtCO₂eq in 2024 the lowest on record, down 8.3% from 2023 levels-. The following are some of the key points, relating to renewable energy and energy emissions:

- 14.6% of Ireland's primary energy was renewable in 2024, the highest value to date.
- Ireland used 1.31 TWh more renewable energy in 2024 than in 2023.

- Ireland’s RES-Overall result is now above its 2020 16% baseline target, with a 2030 target of 43%.
- Ireland’s 2024 RES-Electricity result was 41.3%, up from 40.4% in 2023 – the highest value to date.
- Wind accounted for 4.59 MtCO₂eq or 62.2% of the total avoided GHG emissions in 2024.

Ireland’s installed wind capacity in 2024 was 4.94 GW, which indicates a 4.3% increase from the previous year. Ireland’s 2025 CAP target for installed wind capacity is 6 GW, and its 2030 CAP targets for onshore and offshore capacity are 9 GW and 5 GW, respectively. SEAI’s projections under the WAM scenario indicate a total installed capacity of 9.8 GW by the end of 2030. This WAM scenario is the most optimistic reporting scenario modelled, achieving 68% RES-E by 2030 .

The Report states that over the last 10-years, Ireland has added wind capacity at an average rate of 0.27 GW per annum, although this has dropped to a rate of 0.16 GW over the last 5-years. To align to the pace of the WAM projections needed to deliver on the 80% RES-E target, the rollout of onshore wind capacity needs to return to the rate previously achieved between 2016 and 2019.

Figure 1.25 of the Report, copied below, illustrates the year-on-year increase in installed wind capacity required to align the pace of the WAM.

Figure 1.25: Year-to-year increases in installed wind capacity to 2024, and year-to-year increases in WAM capacity projections of capacity from 2025 to 2030

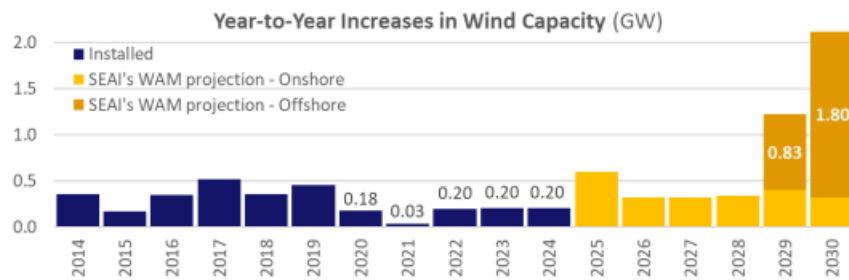


Figure 2.2: Ireland’s year-to-year increases in installed wind capacity required to align the pace of the WAM

The Report also identifies a plateauing of wind generation, which is the largest contributor to renewable electricity, over the last 5 years. For four of the last five years, Ireland’s wind generation has varied between 11.40 TWh and 11.87 TWh, which is only a ±2% variation. In contrast, wind generation in the preceding 5 years (2016 to 2020) showed an average annual increase of over 20%.

The Climate Change Advisory Council Annual Review 2025

The Climate Change Advisory Council (CCAC) open their ‘Annual Review 2025 - Summary for All’ quite starkly,

“1. Ireland remains substantially off track in meeting its EU and national emissions reduction targets, with progress in the Agriculture and Transport sectors, which collectively account for approximately 55% of Irish emissions, proving particularly slow. The Government is urged to move from ambitious statements to implementing impactful and demonstrable actions that build momentum and public buy-in.

2. Failure to meet targets will potentially result in substantial compliance costs, estimated to be in the range of €8–26 billion, and a colossal missed opportunity to invest in Irish households, communities and businesses – creating jobs, improving health and wellbeing, and protecting the most vulnerable in society.”

In addition, the standout recommendation from the CCAC is that “*The delay in transposing EU directives into law, particularly in relation to energy, is concerning given the urgent need to transition to a low-carbon energy system. The Council urges the Government to ensure full transposition of all climate- and energy related directives into law in advance of Ireland’s presidency of the Council of the European Union in July 2026.*”

The Climate Change Advisory Council Annual Review 2025 – Electricity

The CCAC published its annual review in April 2025 where it outlines detailed observations and recommendations for the Electricity sector in Ireland. This review emphasises the urgent need for Ireland to accelerate its transition to renewable energy to meet its 2030 electricity capacity targets and adhere to sectoral emissions ceilings. The CCAC states:

“To meet the carbon budgets, emissions from the Electricity sector will need to reach zero by the end of the 2030s. In 2024, electricity emissions fell by approximately 7% relative to 2023, reaching the lowest level since record-keeping began in 1990. This was driven by a continued decline in the use of coal for electricity generation, coupled with a notable rise in imported electricity for the second consecutive year. Renewable energy is still not being rolled out fast enough, and insufficient investment in the electricity grid means that some of the renewable energy we currently generate cannot be used. Emissions are currently projected to exceed the sectoral emissions ceiling, even in the most optimistic scenario.”

Key observations in relation to Renewable Electricity are outlined below:

- In 2024, 1.6 GW of onshore wind (0.7 GW) and solar (0.9 GW) projects received planning permission, but only 0.5 GW (0.2 GW wind, 0.3 GW solar) were connected.
- Grid constraints led to 1,266 GWh (10.1% of the total available wind energy) of wind and energy being curtailed.
- During 2024, an additional 0.5 GW (0.2 GW wind and 0.3 GW solar) of new utility scale renewable capacity was connected, representing a decrease compared with the 0.6 GW connected in 2023 and significantly below the 1.8 GW annual average increase in capacity that is required to meet 2030 targets.

Ireland’s Climate Change Assessment (January 2024)

In January 2024, the EPA published Ireland’s Climate Change Assessment (ICCA). This assessment provides a comprehensive overview and breakdown of the state of knowledge around key aspects of climate change with a focus on Ireland. The ICCA report is presented in four volumes.

- Volume 1: Climate Science – Ireland in a Changing World
- Volume 2: Achieving Climate Neutrality in 2050
- Volume 3: Being Prepared for Ireland’s Future
- Volume 4: Realising the Benefits of Transition and Transformation

The ICCA Synthesis Report states that having peaked in 2001, Ireland’s GHG emissions have reduced in all sectors except agriculture. However, Ireland currently emits more GHGs per person than the EU average. The ICCA Synthesis Report goes on to state that there has been an identified gap in policy that indicates that Ireland will not meet its statutory GHG emission targets. Achieving net-zero carbon dioxide emissions by 2050 requires significant and unprecedented changes to Ireland’s energy system. Policies tailored to suit different stages of technology development are critical for achieving a net zero energy system. Established technologies, such as wind energy, solar photovoltaics and bioenergy will be key in meeting short-term emission reduction targets (i.e. 2030), whereas offshore wind infrastructure is expected to be the backbone of future energy systems. This can only be achieved with appropriate support schemes, regulation and investments for synergistic growth of offshore wind and other renewable technologies.

In relation to Ireland’s target of achieving net-zero carbon dioxide emissions by 2050 and the role renewable energy will contribute to this; the ICCA Synthesis Report states the following:

“There are well-established ‘no-regret options’ that need to happen now, which can get us most of the way to net zero carbon dioxide emissions. Beyond that, there are ‘future energy choices’ relating to the scale and magnitude of technologies that will help get us all the way. Ireland’s no regret options are demand reduction (e.g. through energy efficiency and reduced consumption), electrification (e.g. electric vehicles and heat pumps), deployment of market-ready renewables (e.g. wind energy and solar photovoltaics) and low-carbon heating options (e.g. district heating), while our future choices include hydrogen, carbon capture and storage, nuclear energy and electro fuels. Renewable energy can increasingly provide our future energy needs but will need to be complemented with carbon dioxide removals to achieve a net zero energy system in hard to-abate sectors”.

2.5 Cutover Peatlands and Climate Change

2.5.1 Introduction

Beginning in 1946, Bord na Móna (BnM) acquired extensive peatlands and associated areas principally for the industrial harvesting of peat for energy (electricity production and briquettes) and as horticultural growing media. These lands extend in total to about 80,000 hectares and are located mainly in the Irish midlands. In January 2021, BnM formally took the decision to cease industrial scale peat extraction on its land bank.

BnM has been examining a range of after uses of its land bank post peat extraction primarily since the 1970’s and 80’s²¹. Potential uses examined and developed include forestry, amenity, mineral extraction, high-value biodiversity and more recently the co-location of large-scale renewable energy production with existing and previously identified uses. Large tracts of cutover and cutaway peatlands have been rehabilitated, are currently undergoing rehabilitation, or will be undergoing rehabilitation in the coming years.

CAP25 recognises the role that peatland rehabilitation has in achieving Ireland’s GHG emission reduction targets. Returning peatlands to more natural conditions will reduce carbon emissions and deliver a range of climate benefits, including long-term carbon storage; increased carbon sequestration; and enhanced resilience to the locked-in impacts of climate change. The improvements to peatlands will enrich Ireland’s natural capital; increase ecosystem services; strengthen biodiversity; and improve water quality and storage attenuation; as well as developing amenity potential.

Peatland rehabilitation and wind farm development have been proven to successfully coexist, as seen with BnM’s Cloncreen Wind Farm and other similar sites across Ireland. These projects demonstrate how renewable energy generation and ecological restoration can operate in parallel, delivering both climate and biodiversity benefits. Please see Section 2.5.4 below for further details.

The National Planning Framework First Revision (Revised NPF) was approved by the Government on the 8th of April 2025 and subsequently approved by both houses of the Oireachtas. The Revised NPF identifies the following policy priority for the Eastern and Midland Region, in which the Proposed Project is located in:

*“Developing the potential of the region in renewable energy terms, in accordance with the capacity allocation targets set out in Chapter 9: Climate Transition and Our Environment, across the technological spectrum from **wind** and solar to biomass and, where applicable,*

²¹ Strategic Framework for the Future use of Peatlands . Bord na Móna May 2011

wave energy, focusing in particular on the extensive tracts of publicly owned peat extraction areas in order to support a managed just transition of local economies to greener energy.”

The Revised NPF highlights the opportunities available for the co-location of renewable energy development and post-industrial peatlands.

“The roll-out of renewables and protection and enhancement of carbon pools such as forests, peatlands and permanent grasslands. It is necessary to ensure that climate change continues to be taken into account as a matter of course in planning-related decision making processes.”

Opportunities also exist for co-location of renewable technology in areas, alongside transport infrastructure corridors, within forestry lands, and on industrial and post-industrial peatlands.

The Proposed Project, which comprises a renewable energy development located within a peatland setting, aligns with the policies and objectives of the Revised NPF. The Proposed Project will generate and supply renewable energy to the national grid, supporting National Strategic Outcome 8: “Transitioning to a low carbon and climate resilient economy”. It will also support NPO 74 and NPO 75 which provide for additional renewable energy capacity allocations in each Regional Assembly and its delivery.

2.5.2 Cutover Peatland Rehabilitation

The CAP23 peatland rehabilitation aim in Ireland focused on restoring degraded peatlands to enhance carbon sequestration, biodiversity, and water regulation, while under CAP25, the initiative continues with expanded funding and targets, though implementation remains variable and progress is still being evaluated against environmental benchmarks. The EU Nature Restoration Law²² mandates the restoration of degraded peatlands, requiring EU Member States to implement rehabilitation measures. The updated rehabilitation target under the EU Nature Restoration Law identifies 30% of peatlands to be rehabilitated by 2030, 40% by 2040, and 50% by 2050.

Europe’s nature is in decline, with more than 80% of habitats in poor condition. The EU Nature Restoration Law aims to restore ecosystems, habitats and species across the EU’s land and sea areas in order to:

- Increase biodiversity;
- Secure the things nature does for free, (i.e., cleaning water and air, pollinating crops, protecting us from floods)
- Limit global warming to 1.5° C
- Build up Europe’s resilience and strategic autonomy preventing natural disasters and reducing risks to food security

The proposal combines an overarching restoration objective for the long-term recovery of nature in the EU’s land and sea areas with binding restoration targets for specific habitats and species. The measures will cover at least 20% of the EU’s land and sea areas by 2030, and ultimately all ecosystems in need of restoration by 2050.

The Applicant is following a decarbonisation strategy aimed at reducing the carbon emissions from its activities that will support the CAP25. BnM’s ‘Brown to Green’ strategy is focused on supporting and delivering Ireland’s objective, to become carbon neutral by 2050. SSE Renewables’ Net Zero Acceleration Programme aims to increase its installed renewable energy capacity to 9GW by 2027 and over 16GW by 2032.

²² <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R1991&qid=1722240349976>

One of the most straightforward ways to reduce carbon emissions from land use is the managed rewetting of peatlands. The first step is ceasing industrial peat extraction, which ceased on the Proposed Project site in June 2023. Re-wetting improves carbon storage and locks the residual peat in the ground. Developing stable cutaway peatland habitats reduces carbon emissions so that the emission of greenhouse gases or via water runoff are reduced. As stated above, peatland rehabilitation and wind farm development has been proven to successfully coexist, as shown by BnM's Clonreen Wind Farm and other similar sites across Ireland. Please see Section 2.5.4 below for further details.

There is a world-wide consensus that restoration of hydrology in damaged peatlands can improve carbon storage. Researchers in Ireland have also reached the same conclusion for Irish peatlands. The EPA funded the BOGLAND project (Renou-Wilson et. al., 2011) and concluded that the managed rewetting of Irish bogs was essential for returning damaged peatlands on a trajectory towards becoming peat-forming ecosystems again. The EPA-funded Carbon Restore Project (Renou-Wilson et. al., 2011) also reported that actively managed rewetting of drained peatlands in Ireland can lead to restoration of functional peatland, such as the return of typical plant and animal species, which in turn may lead to the restoration of peat-formation and the Carbon-sink function.

BnM lands, including the Proposed Project site, are operated under the EPA Integrated Pollution Control (IPC) Licensing regime. The IPC licences (P0500-01), in the case of the Proposed Project site lands) require decommissioning and rehabilitation plans to be drafted and then finalised and implemented once the peat extraction activity has ceased.

The rehabilitation works that are proposed (as part of compliance with Condition 10 of the IPC Licence) within the Proposed Project site are detailed in the draft Cutaway Bog Decommissioning and Rehabilitation Plan (Draft Rehabilitation Plan) (Appendix 2-4 of this EIAR). The Draft Rehabilitation Plan forms part of the Applicant's obligations under the IPC Licence and will be finalised and agreed with the EPA prior to implementation.

The decommissioning and rehabilitation work proposed (in accordance with Condition 10 of the IPC Licence) for Lemanaghan Bog will be in addition to the proposed enhancement/mitigation measures which form part of the Proposed Wind Farm. Irrespective of any further development on the site, BnM's statutory duties to discharge the conditions of its IPC Licence will remain ongoing and the measures outlined in the Draft Rehabilitation Plan will be implemented by BnM in agreement with the EPA, per the BnMs IPC Licence Obligations.

2.5.3

Benefits of Cutover Peatland Rehabilitation

The key objective of cutover peatland rehabilitation is environmental stabilisation. This involves stabilising the bare peat surfaces, slowing water movement across the bog and trapping mobile silt. Raised bogs need certain types of mosses, collectively known as 'sphagnum', to grow in order for peat to form. In cutaway bogs, where the water chemistry and environmental conditions no longer support the growth of sphagnum, the bogs cannot be restored to peat-forming conditions. These bogs are rehabilitated to form other habitats instead.

In a broad sense, cutover peatland rehabilitation will firstly seek to retain water on the site for longer periods, promote revegetation of bare peat areas and reduce the potential for loss of material and carbon through either emission to atmosphere or via surface water discharge.

A number of research papers and reports have been completed over the last decade that have focussed on measurement of the effect of rewetting of peatlands on carbon emissions in the Irish context. Wilson et al. published a paper in 2016 (multi-year greenhouse gas balances at a rewetted temperate peatland) that assessed the variation in carbon emissions arising from a former cutover BnM peatland that had undergone decommissioning and rehabilitation. The paper demonstrated that rewetting had led to a significant reduction in greenhouse gas emissions. It was postulated that under the correct conditions

that the site itself would stabilise in the coming decades and may even become similar to intact peatlands in terms of greenhouse gas dynamics.

The Network Monitoring Rewetted and Restored Peatlands/Organic Soils for Climate and Biodiversity Benefits (NEROS) report was published by the EPA in 2018.²³ The report outlined research on rewetting carried out on a range of degraded peatland sites. The list of sites assessed included Blackwater and Bellacorick bogs both of which had undergone industrial peat extraction and both within the BnM landbank. The report recognised the challenges of rewetting over large landscapes like cutover industrial peat extraction sites. It also recognised that on this type of site there is potential for a mosaic of habitats to form and that not all of those habitats will act as carbon sinks. The report concludes that drained peatlands should be targeted for rewetting as a climate change mitigation strategy.

In July 2022, Wilson et al. published a research article in *Global Change Biology*, '*Carbon and climate implications of rewetting a raised bog in Ireland*'²⁴, which recognises that the premise of rewetting of drained or degraded peatlands to assist in climate change mitigation has gained considerable traction in recent years underpinned by the growing body of research where the main components of the peatland carbon (C) cycle: carbon dioxide (CO₂), methane (CH₄), dissolved organic carbon (DOC) have been quantified in a wide range of peatland types along a drainage continuum (natural-drained-rewetted).

The study was located on a raised bog in Moyarwood, Co. Galway of c. 230ha that had been subject to mechanical peat extraction on the margins for decades. The bog had been extensively drained in the 1980's with drainage ditches located every 15m but milled peat extraction was never commenced. In 2012 a rewetting programme was undertaken involving blocking drains with peat dams at regular intervals. Wilson et al. found in their research that it was clear that rewetting combined with revegetation combined to rapidly switch the study area from a large carbon dioxide source to a small net carbon dioxide sink in year 1, which increased further in years 3–5. The authors postulate that it is probable that the magnitude of the carbon dioxide sink will eventually decline to values similar to those recorded at natural sites.

Other research cited in the article has demonstrated that practical management actions, such as drain blocking, the installation of berms and the construction of peat cells can have a profound effect on peatland carbon dynamic. It is important to note that irrespective of the mechanism under which the cutover peatland is rehabilitated (either rehabilitation as required by Condition 10 of the IPC licence or enhanced rehabilitation under PCAS, Biodiversity Net Gain²⁵ or other schemes) rewetting forms a key part of the measures implemented on those sites.

2.5.4 Wind Farms and Cutover Peatland Rehabilitation

Onshore wind farm development plays a major role in meeting Ireland's GHG reduction commitments. CAP25 reaffirms the 9GW of onshore renewable energy generation target from wind development by 2030. The permanent footprint of an onshore wind farm on BnM land holdings varies between 2 and 4% of each site. Therefore, in excess of 95% of the remaining cutover peatland outside the wind farm development footprint is available for rehabilitation.

Mountlucas windfarm (84MW – 28 Turbines) was developed on cutover peatlands and completed construction in 2014. Rewetting measures as part of rehabilitation were incorporated into the site following construction and the site is now heavily vegetated to the extent that the former peat extraction activity is no longer evident.

²³ https://www.epa.ie/publications/research/biodiversity/Research_Report_236.pdf

²⁴ <https://doi.org/10.1111/gcb.16359>

²⁵ <https://www.sserenewables.com/sustainability/nature-positive/>



Plate 2-1 Aerial Image of Mountlucas wind farm on rehabilitated cutover peatlands (2021)

Cloncreen Wind Farm (75MW- 21 turbines) began delivering energy to the electricity grid in the Autumn of 2022. Similar to the Proposed Project site, the peat source at Cloncreen has been largely exhausted over the years of industrial peat extraction. Since commissioning of the wind farm, rehabilitation works have been completed on the land area at Cloncreen that is not occupied by the permanent footprint of the wind farm infrastructure. See Plate 2-2 and 2-3 below.



Plate 2-2 Peat dams installed on cutover bog within the Cloncreen windfarm site



Plate 2-3 Rewetted areas within the Cloncreen wind farm site

The experience across a range of wind farm sites demonstrates that peatland rehabilitation and wind farm development can co-exist successfully. Since the cessation of peat harvesting in 2020 and the increased urgency to develop renewable energy alternatives, it has generally been accepted by policy makers at national, regional and local level that the cutaway bogs present high-potential locations for renewable energy infrastructure. For example, the National Planning Framework First Revision (2025) states that ‘In relation to peatlands, some of Ireland’s cutaway bogs are suitable to facilitate the generation of energy, most notably wind/biomass’.

The opportunity to develop and deliver renewable energy infrastructure on land that can function as a carbon store and has the potential to revert to a carbon sink as well as enhance wildlife habitats presents a unique opportunity to meet Ireland’s climate change and biodiversity enhancement commitments within the same site.

2.6 Planning Policy Context

2.6.1 Introduction

This section of the EIAR provides the strategic planning context of the Proposed Project. The Proposed Project is in line with national, regional and local policies, frameworks, guidelines and plans. This section has been broken down to the following sections:

- National Policy Context
- Regional Policy Context
- Local Policy Context
- Other Relevant Material Considerations

As a renewable energy project, the Proposed Project is consistent with the overall national policy objectives to increase penetration and deployment of renewable energy resources and has been designed in the context of the relevant wind energy and other guidelines. The specific compliance with the National, Regional and Local/County Development Plan provisions is dealt with in detail in the sections below.

2.6.2 National Planning Policy

The Planning and Development Act 2024

The Planning and Development Act 2024 ('the New Planning Act') was signed into law by the President on the 17th of October 2024, following its passage through both Houses of the Oireachtas. At the time of lodgement of this planning application, the consenting provisions of the Planning and Development Act 2000 (as amended) remain in place. The New Planning Act is commenced by Ministerial Orders which is being done on a phased basis.

The Government has approved an Implementation Plan for the New Planning Act, published on the 4th of March 2025, which sets out the schedule for its phased commencement. The Implementation Plan also outlines a series of initiatives aimed at supporting training and stakeholder engagement across the planning sector to ensure a smooth transition to the new legislative framework. Concurrently, work is ongoing to revise and update the supporting Regulations that will underpin the operation of the New Planning Act.

The planning application for Lemanaghan Wind Farm accounts for the latest commenced provisions of the New Planning Act at the time of submission.

National Planning Framework - First Revision (April 2025)

The National Planning Framework (NPF), first published in February of 2018, forms the top tier of the national planning policy structure which establishes the policy context for the Regional Spatial and Economic Strategies (RSES) and local level development plans. It represents an effort to move away from a developer-led system to one informed by the needs and requirements of society up to 2040. The NPF, together with the National Development Plan 2021 (NDP), combine to form Project Ireland 2040, the overarching planning and investment framework for the social, economic and cultural development of Ireland.

On the 8th of April 2025, the Government approved the National Planning Framework First Revision (Revised NPF) which was subsequently passed through both Houses of the Oireachtas. The Revised NPF aims to address changes that have occurred in Ireland since 2018.

The Revised NPF provides an updated projection for the population of Ireland, with the population expected to increase to 6.1 million by 2040. This population growth will place further demand on both the built and natural environment, and subsequently, the services required to meet said demands. In order to strengthen and facilitate more environmentally focused planning at the local level, the Revised NPF states that future planning and development will need to:

“Tackle Ireland’s higher than average carbon-intensity per capita and enable a national transition to a competitive low carbon, climate resilient and environmentally sustainable economy by 2050, through harnessing our country’s prodigious renewable energy potential.”

National Strategic Outcome 8 (*‘Transition to a Carbon Neutral and Climate Resilient Society’*) notes that in creating Ireland’s future energy landscape, new energy systems and transmission grids will be necessary to enable a more distributed energy generation which connects established and emerging energy sources, i.e., renewables, to major sources of demand.

Chapter 9: Climate Transition and Our Environment of the revised NPF aims to address key national environmental challenges including the transition to a climate neutral economy, sustainable land management, renewable energy and resource efficiency. As per **NPO 70**, the Revised NPF highlights the importance of renewable energy infrastructure to achieve national climate action targets.

“Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a climate neutral economy by 2050.”

Regional Renewable Energy Capacity Allocations have been introduced under the Revised NPF. This was one of the key actions for CAP24 and is supported under CAP25. The Eastern and Midlands Region, in which the Proposed Project is located, is allocated a target of installing an **additional 1,966 MW of onshore wind energy by 2030**, the largest of the three regional Renewable Power Capacity Allocations.

Under **NPO 74** Regional Assemblies are required to plan for the delivery of the regional renewable electricity capacity allocations outlined in the Revised NPF and identify allocations for each of the local authorities within their RSES. Furthermore, **NPO 75** requires Local Authorities to plan for the delivery of Target Power Capacity (MW) allocations consistent with the relevant RSES, through their City and County Development Plans. At the time of writing, no local Target Power Capacity allocations have been established, however it is clear from the regional allocation that the Eastern and Midlands Region is set to deliver a significant amount of onshore wind energy in the coming years.

The introduction of renewable energy targets represents a more active and prescriptive approach to land use planning for renewable energy development. The Revised NPF aligns the national target of 9GW of onshore wind energy with the policies and objectives of Local Authorities. In regard to this, it is clear that the provision of new renewable energy generation through the Proposed Project is in line with aims and objectives of the Revised NPF, which seeks to transition to a carbon-neutral economy.

The Revised NPF states that ‘*opportunities also exist for **co-location of renewable technology** in areas, alongside transport infrastructure corridors, within forestry lands, and on industrial and **post-industrial peatlands***’. Furthermore, it states that ‘*in relation to peatlands, some of **Ireland’s cutaway bogs are suitable to facilitate the generation of energy, most notably wind/biomass**. Considering the significant amount of peatlands in the ownership of semi-State bodies, a medium to longer-term strategic national land use plan for peatlands in State ownership will be prepared in order to manage their most appropriate future use, building on the existing National Peatlands Strategy and other national policy related to peatlands conservation and management*’ (emphasis added).

For the Eastern and Midland Region in particular, the Revised NPF states the priority of ‘*developing the potential of the region in renewable energy terms ... across the technological spectrum from wind and solar to biomass ... focusing in particular on the extensive tracts of publicly owned peat extraction areas in order to support a managed just transition of local economies to greener energy*’.

The Proposed Project will support the policies and objectives of the NPF in relation to renewable wind energy and peatlands by co-locating a wind energy development within a peatland setting. The Proposed Project will support the Eastern and Midland Region to achieve its renewable energy generation potential, particularly in peat extraction areas, supporting a just, low-carbon and climate resilient transition.

National Development Plan 2021-2030

The National Development Plan 2021 – 2030 (NDP) was published on the 4th of October 2021 and sets out the major public investment projects identified by the Government which are to play a significant role in addressing the opportunities and challenges faced by Ireland over the coming years such as housing, health, population growth, and – most relevant to the Proposed Project – climate change.

Reflecting on the recent publication of the IPCC’s 6th Assessment Report, the NDP notes that the Irish Government is fully committed to ‘playing its part’ to ensure that the worst climate change damage can be avoided, e.g., significant reductions in carbon dioxide and other GHG emissions as assisted by the achievement of both European and national renewable energy targets. Specifically, the NDP states that,

“The next 10 years are critical if we are to address the climate crisis and ensure a safe and bright future for the planet, and all of us on it.

The investment priorities included in this chapter [Ch. 13] must be delivered to meet the targets set out in the current and future Climate Action Plans, and to achieve our climate objectives. The investment priorities represent a decisive shift towards the achievement of a decarbonised society, demonstrating the Government’s unequivocal commitment to securing a carbon neutral future.”

Notwithstanding this, the NDP acknowledges that it is not its role to set out a specific blueprint for the achievement of Ireland’s climate targets; but as noted above, facilitate capital investment allocations for the climate and environmental strategic priorities.

One of the NDP’s strategic climate priorities is the need for low-carbon, resilient electricity systems; specifically, the plan commits to increasing the share of renewable electricity up to 80% by 2030. This is characterised by the NDP as an ‘*unprecedented commitment to the decarbonisation of electricity supplies*’ which, is certainly ambitious and an explicit driver for the deployment of new renewable generators, e.g., the Proposed Project, and the safeguarding / maintenance of existing assets. It is noted that the reliability of electricity supplies will also be strengthened through investment in the electricity transmission and distribution grid. The focus of investment in regulated network infrastructure is to contribute to a long-term, sustainable and competitive energy future for Ireland.

2.6.2.1 Project Compliance with National Policy

With regard to the above, it is considered that the Proposed Project is in line with and supported by the Revised NPF, and the NDP.

The Revised NPF projects a population increase of approximately one million people by 2040 and therefore recognises the strain and demand this will put on Ireland’s energy system. In order to ensure Ireland delivers on its renewable energy and carbon emission reduction targets, the NPF recognises the need for increased renewable energy onto the national grid. This shift from fossil fuels is dependent upon projects such as the Proposed Project which will add c. 90MW of renewable energy to Ireland’s renewable energy capacity.

The NDP is clear in its priority to reach a low-carbon, climate-resilient society over the lifetime of the NDP. The Proposed Project, if permitted, will provide clean, renewable electricity to the national grid, furthering development objectives of the NDP, namely the target to increase the share of renewable electricity up to 80% by 2030.

This shift from fossil fuels is dependent upon schemes such as the one proposed to generate renewable energy. Given the projected population increase, it is considered that if the share of renewable energy onto the grid is not increased, Ireland will fail to reach the National and International targets on emission reductions. The addition of 15 no. wind turbines, with an estimated electricity generation capacity of 90MW, will significantly contribute to Ireland’s national targets and support the country in meeting its renewable energy and carbon emission reduction goals at the EU level.

2.6.3 Regional Planning Policy

Regional Spatial & Economic Strategy for the Eastern and Midland Regional Assembly (EMRA)

The Eastern and Midland Regional Assembly (EMRA) established in January 2015, is part of the regional tier of governance in Ireland and is primarily focused on the preparation and implementation of Regional Spatial and Economic Strategies (RSES), integration of Local Economic and Community Plans (LECPs), management of EU Operational Programmes, EU project participation, implementation

of national economic policy, and working with the National Oversight and Audit Commission. The RSES adopted by the Assembly on the 28th of June 2019 provides a long-term, strategic development framework for the future physical, economic and social development of the Eastern and Midland Region. The RSES seeks to achieve balanced regional development and full implementation of Project Ireland 2040 – the National Planning Framework.

The principal statutory purpose of the RSES is to support the implementation of the Project Ireland 2040 NPF and NDP and the economic policies and objectives of the Government. The RSES aims to build on the region’s strengths and potential to become a more prosperous, sustainable, climate resilient and attractive region for the benefit of all its people up to 2040 and beyond.

The Eastern and Midland region is characterised by the RSES as being ‘*major load centre on the Irish electricity transmission system*’. The RSES also acknowledges that ‘*Reducing energy emissions will require transition from fossil fuels (including peat-fired stations in the Midlands) and high embodied carbon products, towards renewable energy and biobased products*’. In order to facilitate the growth of renewables within the region, the RSES notes that the EMRA aims to encourage stakeholders, i.e., industry, commercial, etc., to be the first to facilitate new opportunities and concentrate on possibilities to further advance renewable energy generation and use.

The RSES identifies the diversification and growth of smart specialisation of local economies (including energy and renewables, bioeconomy and circular economy) with a focus generating electricity supply from indigenous renewable sources in the Midlands to supporting the ‘Just Transition’. In this regard, the RSES clearly acknowledges that the Region’s current reliance on traditional power sources (e.g., fossil fuels such as coal, peat and oil-fired generators) is not a sustainable long-term strategy, and in light of the climate change emergency occurring both within Ireland and at a broader global scale, the establishment of a low-carbon power system based on renewable energy is necessary pre-requisite for future development.

“The Strategy supports an increase in the amount of new renewable energy sources in the Region. This includes the use of wind energy – both onshore and offshore, biomass, and solar photovoltaics and solar thermal, both on buildings and at a larger scale on appropriate sites in accordance with National policy and the Regional Policy Objectives outlined in this Strategy

It is necessary to establish a consistency of approach by planning authorities, both in identifying areas suitable for renewable energy development and having regard to potential impacts, inter alia on biodiversity, landscape and heritage.”

Building on the above aim, the RSES identifies several key drivers required to support and facilitate the electricity generation via indigenous renewable sources:

- Facilitating the provision of appropriate renewable energy infrastructure and enabling technologies;
- Expansion and upgrading of the grid with the aim of increasing the share of variable renewable electricity that the all-island system can accommodate onshore wind, bioenergy, solar and offshore energy;
- Moving from carbon intense fossil fuel generation to lower emissions fuels such as natural gas; and
- The need to ensure sufficient electricity to meet increased demand.

These strategic aims are captured in Regional Policy Objectives (RPOs) 7.35 and 7.36:

- **RPO 7.35:** EMRA shall, in conjunction with local authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. The Strategic Energy Zones for the Region will ensure all environmental constraints are addressed in the analysis. A

regional landscape strategy could be developed to support delivery of projects within the Strategic Energy Zones.

- **RPO 7.36:** Planning policy at local authority level shall reflect and adhere to the principles and planning guidance set out in Department of Housing, Planning and Local Government publications relating to ‘Wind Energy Development’ and the DCCAE Code of Practice for Wind Energy Development in Ireland on Guidelines for Community Engagement and any other relevant guidance which may be issued in relation to sustainable energy provisions.

The RSES identifies the following in relation to development of energy infrastructure to meet projected demand levels, to ensure “...a long-term, sustainable and competitive energy future for Ireland”:

- **RPO 10.20:** Support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the Region and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy. This includes the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity and gas transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and the planning process.
- **RPO 10.22:** Support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned growth and transmission/distribution of a renewable energy focused generation across the major demand centres to support an island population of 8 million people, including... Facilitate the delivery of the necessary integration of transmission network requirements to allow linkages of renewable energy proposals to the electricity transmission grid in a sustainable and timely manner.
- **RPO 10.23:** Support EirGrid’s Implementation Plan 2017 – 2022 and Transmission Development Plan (TDP) 2016 and any subsequent plans prepared during the lifetime of the RSES that facilitate the timely delivery of major investment projects subject to appropriate environmental assessment and the outcome of the planning process.

The RSES is ultimately supportive of the future growth of renewable energy technology in the region and sets a clear precedent to identify and capitalise on those opportunities associated with the transition to renewable energy generation.

2.6.3.1 Project Compliance with Regional Planning Policy

The RSES for the Eastern and Midlands Region states that the region has a crucial role to play in Ireland’s transition to a low-carbon future. It is considered that the provision of the Proposed Project would facilitate this just transition and is particularly in line with RPO 7.35,7.36, 10.20, 10.22 and 10.23 as outlined above.

In the region, a noticeable trend has emerged to recognise and take advantage of emerging opportunities related to the move towards a decarbonized economy, following the region’s objective to ‘*shift from its reliance on using fossil fuels and natural gas as its main energy source to a more diverse range of low and zero-carbon sources, including renewable energy and secondary heat sources*’, particularly in support of renewable energy generation. Therefore, the Proposed Project is considered to be in line with Regional Policy.

2.6.4 Local Planning Policy

The site falls within the administrative area of Offaly County Council and therefore, is subject to the planning policies and objectives set out in the Offaly County Development Plan 2021-2027.

2.6.4.1 Offaly County Development Plan 2021-2027

The Offaly County Development Plan 2021-2027 (OCDP) was adopted on the 10th of September 2021 and came in to effect on the 20th of October 2021. The OCDP outlines the overall strategy for the proper planning and sustainable development of County Offaly. The CDP and accompanying documents (including the Wind Energy Strategy) set out the key policy context for the development of Offaly County.

The importance of climate action is outlined in ‘Chapter 3: Climate Action and Energy’ of the OCDP. The strategic aim of Chapter 3 is outlined below:

“To achieve a transition to an economically competitive, low carbon climate resilient and environmentally sustainable county, through reducing the need to travel, promoting sustainable settlement patterns and modes of transport, and by reducing the use of non-renewable resources, whilst recognising the role of natural capital and ecosystem services in achieving this”.

Furthermore, the OCDP includes the following policies in relation to climate action and reducing GHG emissions, which aligns the County with wider European, national and regional objectives:

- **CAEP-07** It is Council policy to support and facilitate European and national objectives for climate adaptation and mitigation as detailed in the following documents, taking into account other provisions of the Plan (including those relating to land use planning, energy, sustainable mobility, flood risk management and drainage);
 - *Climate Action Plan (2019 and any subsequent versions);*
 - *National Mitigation Plan 2017 (or subsequent editions);*
 - *National Climate Change Adaptation Framework (2018 and any subsequent versions);*
 - *Relevant provisions of any Sectoral Adaptation Plans prepared to comply with the requirements of the Climate Action and Low Carbon Development Act 2015, including those seeking to contribute towards the National Transition Objective, to pursue, and achieve, the transition to a low carbon, climate resilient and environmentally sustainable economy by the end of the year 2050; and*
 - *Offaly Climate Change Adaptation Strategy.*
- **CAEP-08** It is Council policy to support the implementation and provision of the decarbonisation projects listed in Table 3.2 of the County Development Plan.
- **CAEP-10** It is Council policy to support local, regional, national and international initiatives for climate adaptation and mitigation and to limit emissions of greenhouse gases through energy efficiency and the development of renewable energy sources which make use of all natural resources, including publicly owned lands, in an environmentally acceptable manner.
- **CAEP-11** It is Council policy to support the transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050, by way of reducing greenhouse gases, increasing renewable energy, and improving energy efficiency
- **CAEP-14** It is Council policy to cooperate with the Climate Action Regional Office (CARO) in respect of adaptation and mitigation of greenhouse gas emissions, and future climate change adaptation strategies.

The OCDP sets out relevant policies and objectives which support the continues investment in renewable and wind energy generation in County Offaly:

- **CAEP-25** It is Council policy to encourage and facilitate the production of energy from renewable sources, such as from bioenergy, waste material, solar, hydro,

geothermal and wind energy, subject to proper planning and environmental considerations.

- **CAEP-28** It is Council policy to co-operate if required with the Eastern and Midland Regional Assembly in identifying Strategic Energy Zones as areas suitable for larger energy generating projects, community and micro energy production, whilst ensuring environmental constraints and a regional landscape strategy are considered.
- **CAEP-37** It is Council policy to recognise the importance of wind energy as a renewable energy source which can play a vital role in achieving national targets in relation to reductions in fossil fuel dependency and therefore greenhouse gas emissions
- **CAEP-38** It is Council policy that in assessing planning applications for wind farms, the Council shall:
 - have regard to the provisions of the Wind Energy Development Guidelines 2006, the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change 2017 and the Draft revised Wind Energy Guidelines 2019 which are expected to be finalised in the near future;
 - have regard to ‘Areas Open for Consideration for Wind Energy Developments’ in the Wind Energy Strategy Designations Map from the County Wind Energy Strategy;
 - the impact of the proposed wind farm development on proposed Wilderness Corridors as detailed in Objective BLO-28 of Chapter 4;
 - have regard to Development Management Standard 109 on wind farms contained in Chapter 13 of this Plan; and
 - have regard to existing and future international, European, national and regional policy, directives and legislation.
- **CAEO-03** It is an objective of the Council to achieve a reasonable balance between responding to government policy on renewable energy and in enabling the wind energy resources of the county to be harnessed in an environmentally sustainable manner.
- **CAEO-04** It is an objective of the Council to ensure the security of energy supply by supporting the potential of the wind energy (and other renewable) resources of the County in a manner that is consistent with proper planning and sustainable development of the area.
- **CAEO-05** It is an objective of the Council to implement the Council’s Wind Energy Strategy as follows:
 1. *In ‘Areas Deemed Open for Consideration for Wind Energy Development’ as identified in Map No. 10 ‘Wind Energy Strategy Designations’, the development of windfarms and smaller wind energy projects will be considered;*
 2. *In all other areas, wind energy developments shall not normally be permitted – except as provided for under relevant exemption provisions in the Planning and Development Regulations 2001 (as amended); and*
 3. *Applications for re-powering (by replacing existing wind turbines) and extension of existing and permitted wind farms will be assessed on a case by case basis and will be subject to criteria listed in Development Management Standard 109 contained in Chapter 13 of Volume 1 of this County Development Plan and the Section 28 Ministerial Wind Energy Development Guidelines.*

The OCDP is supportive of the transition from fossil fuel-based energy to renewable energy and acknowledges that this transition will need to be underpinned by a strong electricity transmission network. The OCDP states that the Council “recognises that essential future upgrades are required to the electricity grid in the midlands as outlined in EirGrid Tomorrow’s Energy Scenarios 2019 System Needs Assessment and will support EirGrid in future Programmes identifying grid solutions, in both infrastructural and technological terms, in order to facilitate the electricity targets, set out in the Government’s Climate Action Plan 2019 and the National Energy and Climate Plan 2021-2030”.

In relation to electricity, the OCDP will facilitate the delivery of a secure and adequate electricity infrastructure to meet the growth in demand and to ensure that an efficient and reliable electricity supply is available to households, business, and industry. The OCDP states that Offaly County Council will continue to work closely with EirGrid to facilitate the ongoing development of the grid infrastructure in line with national, regional and local requirements.

A number of policies within the OCDP relate to and support the provision of the Proposed Grid Connection, as set out below:

- **CAEP-01** It is Council policy to support and facilitate the development, reinforcement, renewal and expansion of the electricity transmission and distribution grid, including the development of new lines, pylons and substations as required to provide for the future physical and economic development of Offaly.
- **CAEP-02** It is Council policy to require that, in all new developments, local services such as medium and low voltage electricity cables shall be undergrounded, with multiple services accommodated in shared strips underground and that access covers are shared, whenever possible
- **CAEP-03** It is Council policy that proposals for new electricity distribution lines 38 kV or above along with transmission lines 110 kV or above will be considered subject to the protection of Designated and Non Designated Sites as outlined in Objectives BLO-02 to BLO-06 and landscape considerations as outlined in objectives BLO-22 Areas of High Amenity, BLO-24 Landscape and BLO 26 and BLO-27 Protection of Key Scenic Views, Prospects and Key Amenity Routes.
- **CAEP-04** It is Council policy to support EirGrid's Implementation Plan 2017 – 2022 and Transmission Development Plan 2019 and any subsequent plans prepared during the plan period that facilitate the timely delivery of major investment projects subject to appropriate environmental assessment and the outcome of the planning process.
- **CAEP-05** It is Council policy to support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned growth and transmission/ distribution of a renewable energy focused generation across the major demand centres. This includes:
 - Facilitating trans-boundary networks into and through the County and Region to ensure the Regional Spatial and Economic Strategy can be delivered in a sustainable and timely manner;
 - Facilitate the delivery of the necessary integration of transmission network requirements to allow linkages of renewable energy proposals to the electricity transmission grid in a sustainable and timely manner; and
 - Support the safeguarding of strategic energy corridors from encroachment by other developments that could compromise the delivery of energy networks.

Offaly Wind Energy Strategy 2021-2027

The Wind Energy Strategy is an integral part of the OCDP, building upon previous strategies and incorporating updated legislation and policies. The Offaly Wind Energy Strategy (WES) was prepared with the overall aim to facilitate the development of wind farms to contribute towards International, European, National and Regional climate targets.

Its core objectives include:

1. *“Reflect and plan for technological advances in wind farms over the next number of years.*
2. *Support wind energy as a renewable energy source which can play a vital role in achieving national targets in relation to reductions in fossil fuel dependency and greenhouse gas emissions;*

3. *Identify key areas within the county that are ‘Open for Consideration for Wind Energy Developments’ or ‘Unsuitable for Wind Energy Developments’ based on wind speed, access to the electricity grid and substations, and avoidance of adverse impacts on the landscape and designated sites.*
4. *Consider the potential for micro-generation (generation that is less than 11 kW) wind energy developments and for small community based proposals outside key areas within the county that are ‘Open for Consideration for Wind Energy Developments’*
5. *Ensure full compliance with the requirements of EU SEA Directive 2001/42/EC and Statutory Instrument 436/2004 [Planning and Development (Strategic Environmental Assessment) Regulations 2004] on the assessment of the effects of certain plans and programmes on the Environment, and the Planning and Development Act 2000 (as amended), the EU Habitats Directive (92/43/EEC) and EU Birds Directive (2009/147/EC).”*

The strategy employs a step-by-step sieve mapping analysis of the key environmental, landscape and technical criteria to identify suitable locations:

- Step 1: Existing Wind Speeds and accessibility to electricity transmission and distribution grids
- Step 2: Evaluation of the landscape and its sensitivity for wind energy developments
- Step 3: Overlay of the Wind Energy Mapping with Landscape Evaluation and Sensitivity Analysis with information regarding built and natural heritage, archaeological and amenity designations in the Development Plan and existing settlements within the county

Based on the above assessment, the WES identifies key areas within the county that are designated as ‘Areas Deemed Open for Consideration for Wind Energy Developments’ which are characterized as

“These areas are open for consideration for wind energy development as these areas are characterised by low housing densities, do not conflict with European or National designated sites and have the ability by virtue of their landscape characteristics to absorb wind farm developments.”

Conversely, ‘Areas Not Deemed Suitable for Wind Energy Developments’ are characterized as

“(a) This area is considered to be generally unsuitable for wind farm development due to significant environmental, heritage and landscape constraints and housing density.

(b) Individual small scale turbines will be considered on a case by case basis having regard to relevant exemption provisions in the Planning and Development Regulations 2001 as amended.

(c) Applications for re-powering (by replacing existing wind turbines) and extension of existing and permitted wind farms will be assessed on a case by case basis and will be subject to criteria listed in Development Management Standard 109 contained in Chapter 13 of Volume 1 of this County Development Plan and the Section 28 Wind Energy Development Guidelines.”

‘Areas Deemed Open for Consideration for Wind Energy Developments’ are considered suitable for wind farm development with good/excellent wind resources, access to grid, appropriate distance from properties and location outside designated sites. A target of minimum 466.3 MW from these areas is identified in Chapter 3 Section 3.2.7 of the Offaly County Development Plan 2021-2027.

The OCC’s Chief Executive’s Report on the Material Alteration Consultation Stage of the OCDP (August 2021) confirmed that Lemanaghan Bog specifically is designated as ‘Open for consideration for Wind Energy Development’ as the area:

- has a viable wind speed and good access to the electricity grid;
- has fewer environmental and landscape constraints than other areas in the county;
- is characterised by dispersed or sparse patterns of rural housing;
- is of a sufficient size to accommodate commercial wind farms and associated infrastructure rather than a smaller remote and dispersed area.

As seen in Figure 2-3 below, the Proposed Wind Farm turbines are located within an area designated as ‘Areas Deemed Open for Consideration’ for Wind Energy Developments, with the exception of T05 which is located on the boundary of an area designated ‘not Deemed Suitable for Wind Energy Developments’.

A detailed site-specific constraints assessment has been undertaken as part of the design process (see Chapter 3, Section 3.2.5.2.1) which demonstrates that this area of the Proposed Project site is a suitable location for a single wind turbine.

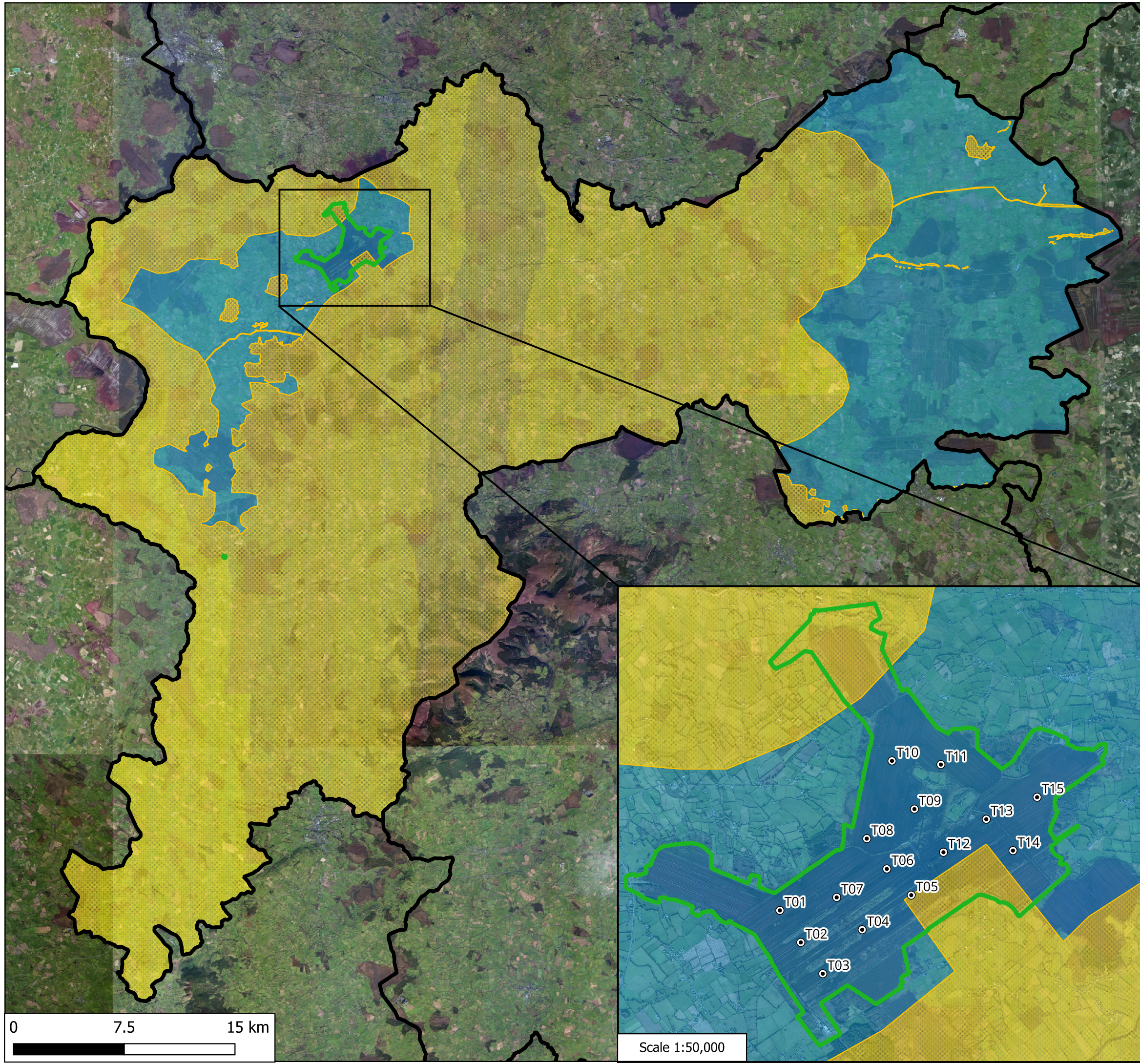
Special cognisance has been taken of the rationale behind zoning of this area of the site as ‘Areas Not Deemed Suitable for Wind Energy Developments’. The decision to exclude this area from the ‘Open for Consideration for Wind Energy Development’ zoning was singularity to protect the character of the (insert name) monastic site.

As noted in the OCC’s Chief Executive’s Report on the Material Alteration Consultation Stage of the OCDP (August 2021), the decision ‘*which excluded from the designation ‘Open for Consideration for Wind Energy Development’ an area 500 metres north of the disused railway line known locally as “The Banagher Line” and 700 metres in each direction from Lemanaghan/Pollagh junction east towards Ballycumber and west towards Ferbane in order to protect the character of the monastic site.*




The impact of the Proposed Project on archaeology and the monastic site has been carefully considered throughout the design process. As concluded in Chapter 13 Cultural Heritage, no significant direct or indirect effects to the recorded cultural heritage resource as a result of the Proposed Project have been identified. The monastic site is also identified in Chapter 14 Landscape and Visual impact assessment, which provides an impact assessment on the monastic site and concludes that ‘*overall, residual effects on the landscape setting of the Monastic Site are ‘Moderate.’* Please see Volume 2: Photomontage Booklet, VP12 – VP14 for further visual detail of the Proposed Wind Farm and effects on the Lemanaghan Monastic Site.

The WES also divides the county into areas for the assessment of their wind energy potential. The assessment includes 12 areas, of which the Proposed Project is located in Area 5 ‘*Area generally west of Doon and northeast of Ferbane*’. The assessment of Area 5 is as follows:



‘This area with the exception of Endrim Hill and Cor Hill is relatively flat and slightly undulating. There exists a number of significant tracts of peatlands, transitional woodlands and coniferous forestry at Clongawny, Clonlyon and Castletown, which having regard to the low density of housing in their vicinity and extensive tracts of flat peatlands in this area offer potential to accommodate wind farm developments.’




Map Legend

-  EIAR Site Boundary
-  Proposed Turbine Layout
-  County Boundaries

County Offaly Wind Energy Strategy Designations

-  Areas Open For Consideration
-  Areas Not Deemed Suitable



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Drawing Title
County Offaly Wind Energy Strategy Area Designations

Project Title
Lemanaghan Wind Farm, Co. Offaly

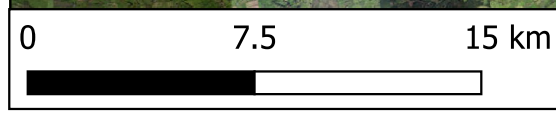
Drawn By EM	Checked By EC
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Project No. 200804	Drawing No. Figure 2-3
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Scale 1:250,000	Date 2025-10-22
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Scale 1:50,000

The Development Management Standard 109 contained in the OCDP Chapter 13 of Volume 1 states:

“DMS-109 Wind Farms When assessing planning applications for wind energy developments the Council will have regard to;

- *the Wind Energy Development Guidelines for Planning Authorities, DoEHLG, (2006) and any amendments to the Guidelines which may be made; and*
- *the Wind Energy Strategy Designations Map from the County Wind Energy Strategy showing areas identified as ‘Areas Open for Consideration for Wind Energy Developments’ and ‘Areas not deemed suitable for Wind Energy Developments’, and specific policy for wind development in these areas as outlined in Section 8 of the County Wind Energy Strategy;*

In addition to the above, the following local considerations will be taken into account by the Council in relation to any planning application;

- *Impact on the visual amenities of the area;*
- *Impact on the residential amenities of the area;*
- *Scale and layout of the project, any cumulative effects due to other projects and the extent to which the impacts are visible across the local landscape;*
- *Visual impact of the proposal with respect to protected views, scenic routes and designated scenic landscapes and proposed Wilderness Areas as detailed in Chapter 4 of this Plan;*
- *Impact on nature conservation, ecology, soil, hydrology, groundwater, archaeology, built heritage and public rights of way;*
- *Impact on ground conditions and geology;*
- *Consideration of falling distance plus an additional flashover distance from wind turbines to overhead transmission lines;*
- *Impact of development on the road network in the area;*
- *Impact of the development on radio observatories and broadcast communications in the area; and*
- *Impact on human health in relation to noise disturbance (including consistency with the World Health Organisations 2018 Environmental Noise Guidelines for the European Region), shadow flicker and air quality.”*

When assessed in accordance with the Development Management Standard 109 within the OCDP, the Proposed Project is found to be in compliance, which is demonstrated in detail in Table 7-5 in the Planning Report which accompanies this application.

The WES also refers to the NPF 2018 in the context of National Strategy Outcome (NSO) 8, which relates to ensuring “*Transition to a Low Carbon and Climate Resilient Society*”. National Policy Objective 55 seeks to “*Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050*”. The Proposed Project will support the aims of these policies in achieving a low-carbon economy by 2050.

As outlined in this EIAR and the accompanying Planning Report, the layout of the Proposed Wind Farm has been carefully developed in accordance with the opportunities and sensitivities identified in Map 10 of the WES, ensuring that the site represents a suitable and appropriate location for a wind energy development and all ancillary infrastructure. Having regard to the factors listed above, the Proposed Wind Farm is in close proximity to the existing energy transmission network and road network, requires minimal vegetation removal and has suitable wind speeds. Furthermore, the Proposed Wind Farm has few sensitivities constraining wind energy development. The Proposed Project is not prone to landslides and is considered to be at low risk of peat failure. (as detailed in Chapter 8 Land, Soils and Geology and Appendix 8-1 Peat Stability Risk Assessment) and has been

designed to avoid neighbouring high-value Annex 1 habitat areas (as detailed in Chapter 6 Biodiversity). The population density is 33 persons per square kilometre within the Population Study Area (Section 5.2.1 of Chapter 5: Population and Human Health) which is significantly lower than the population density of County Offaly at 73.27 per square kilometre. As such it is considered that the Proposed Wind Farm is in accordance with the aims and objectives of the WES and represents an opportunity to increase the supply of renewable electricity to the national grid on a suitable site.

2.6.4.2 Compliance with Local Policy Objectives

In summary, the OCDP and associated WES fully recognises the importance of tackling climate change through the increased supply of renewable energy. The OCDP outlines the County's commitment to climate action and the need to meet national objectives regarding a reduction in GHG emissions. The Offaly County Council seeks to support and facilitate the sustainable provision of a reliable energy supply in the County, with emphasis on increasing energy supplies derived from renewable resources and reducing dependency on fossil fuels. Furthermore, there is a range of policies in place which support the development of renewable energy.

The layout of the Proposed Wind Farm has been strategically developed, with the Proposed Wind Farm turbines being located in an area classified as 'Areas Deemed Open for Consideration for Wind Energy Developments' within the WES, with the exception of T05 which is located on the border of an area designated 'Not Deemed Suitable for Wind Energy Developments'. The overlap of T05 with the border of the 'Areas Not Deemed Suitable for Wind Energy Developments' is minor and as demonstrated by this ELAR, will not give rise to any significant effects on the environment. When assessed under Development Management Standard 109 of the OCDP, the Proposed Project is in compliance (see Table 7-5 in the Planning Report). Accordingly, the Proposed Project is considered to be compliant with the relevant provisions of the OCDP and represents proper planning and sustainable development in the functional area of the Offaly County Council.

2.6.5 Other Relevant Onshore Wind Energy Planning Policy Publications

The following relevant onshore wind planning policy publications and/or best practice guidelines were considered in the design and assessment of the Proposed Project.

Wind Energy Development Guidelines 2006

In June 2006, the then Department of Environment, Heritage and Local Government (DoEHLG) published the Wind Energy Development Guidelines (DoEHLG 2006 Guidelines) under Section 28 of the Planning Act. The aim of the DoEHLG 2006 Guidelines was to assist the proper planning of wind power projects in appropriate locations around Ireland. The DoEHLG 2006 Guidelines also highlight general considerations in the assessment of all planning applications for wind energy. They set out advice to planning authorities on planning for wind energy through the development plan process and in determining applications for planning permission. They contain guidelines to ensure consistency of approach throughout the country in the identification of suitable locations for wind energy development.

Each wind energy development has its own characteristics and defining features, and it is therefore impossible to write specifications for universal use. The DoEHLG 2006 Guidelines should be applied practically and do not replace existing national energy, environmental and planning policy. While the DoEHLG 2006 Guidelines remain the relevant guidelines in place, at the time of lodgement, decision makers (Planning Authorities and ACP) are not bound to their provisions, and they (and do) consider updated standards/requirements/specifications in assessing impacts and the proper planning and sustainable development of the area.

Draft Wind Energy Development Guidelines 2019

The Department of Housing, Planning and Local Government (DoHPLG) published the draft Revised Wind Energy Development Guidelines (the Draft DoHPLG 2019 Guidelines) in December 2019. A consultation process in relation to the Draft DoHPLG 2019 Guidelines concluded on the 19th of February 2020. A further review of the Draft DoHPLG 2019 Guidelines is currently underway by the Department of Housing, Local Government and Heritage (DoHPLG) and the DECC, particularly in relation to noise limits. Since the publication of the Draft DoHPLG 2019 Guidelines, there have been significant changes in national policy regarding renewable energy targets, giving further impetus to the importance of the further review. The Draft DoHPLG 2019 Guidelines set out that that the proper planning and sustainable development of areas and regions must be considered when local authorities prepare their development plans and assess planning applications, irrespective of the significant role renewable energy has to play in tackling climate change.

The Draft DoHPLG 2019 Guidelines note that potential impacts of wind energy development proposals on the landscape, including the natural and built environment, must be considered along with the legitimate concerns of local communities. With this in mind, and in line with the previously stated “preferred draft approach”, the Draft DoHPLG 2019 Guidelines primarily focus on addressing a number of key aspects including, but not limited to:

- Acceptable noise thresholds and monitoring frameworks;
- Visual amenity setback;
- Control of shadow flicker;
- Compliance with Community consultation and dividend requirements, as included within the obligatory Community Report; and
- Consideration of the siting, route and design of the Proposed Grid Connection as part of the whole project.

The design of the Proposed Project has been developed in accordance with the provisions of the Draft DoHPLG 2019 Guidelines (for example in relation to 4 times the turbine tip height setback distance from third-party sensitive receptors) and the inclusion of a standalone community report.

As stated above, the submission period for the Draft DoHPLG 2019 Guidelines closed in February 2020. Under the consultation, concerns were raised in relation to a number of themes including, but not limited to; noise, visual amenity, setback and shadow flicker. With regards to noise, a number of the received submissions noted that the provisions put forward in the Draft DoHPLG 2019 Guidelines were unworkable and could impact the viability of the entire onshore wind sector. In relation to setback distances there was strong criticism with regards to this distance being measured to the curtilage of a property due to this measurement being ambiguous and difficult to implement. Furthermore, questions were raised surrounding the strict measures proposed for shadow flicker; the Draft Guidelines (DoHPLG, 2019) put forward the provision that *‘there will be no shadow flicker at any existing nearby dwelling or other relevant existing affected sensitive property’* which may not allow time for the safe shutting down of turbines.

The Government made the commitment in the ‘Programme for Government 2025 – Securing Ireland’s Future’ to prioritise the publication of new Wind Energy Development Guidelines, having regard to international best practice and standards. At time of writing, the Draft DoHPLG 2019 Guidelines remain unadopted. The relevant wind energy guidelines for the purposes of Section 28 of the Planning Act, as amended, remain those published in 2006, the Guidelines (DoEHLG, 2006). Notwithstanding this, however, due to the timelines associated with the planning process for renewable energy projects it is possible that an updated version of the Draft DoHPLG 2019 Guidelines may be finalised during the consideration period for the current planning application for the Proposed Project. To this end, on the basis of the details available from the Draft DoHPLG 2019 Guidelines it is anticipated that the Proposed Project will be capable of adhering to the relevant noise and shadow flicker standards. While the final guidelines have not yet been published, it should be noted that Shadow Flicker and Noise are entirely controllable and are discussed further in Chapter 5 and Chapter 12, respectively. In addition,

the Proposed Project maintains a 4 times maximum tip height set back between turbines and sensitive receptors which is currently the recognised standard for visual amenity purposes, as outlined in the Draft DoHPLG 2019 Guidelines. Furthermore, comprehensive community consultation has also been undertaken (refer to Appendix 2-2).

IWEA Best Practice Guidelines for the Irish Wind Energy Industry 2012

The Irish Wind Energy Association (IWEA) (now Wind Energy Ireland) published updated Wind Energy Best Practice Guidelines for the Irish Wind Industry in 2012 (hereafter referred to as the IWEA Guidelines). The IWEA Guidelines aim to encourage and define best practice development in the wind energy industry, acting as a reference document and guide to the main issues relating to wind energy developments. The purpose of the IWEA Guidelines is to encourage responsible and sensitive wind energy development, which takes into consideration the concerns of local communities, planners, and other interested groups. The IWEA Guidelines outline the main aspects of wind energy development with emphasis on responsible and sustainable design and environmental practices, on aspects of development which affect external stakeholders, and on good community engagement practices. In approaching the development of IWEA Guidelines the aim was to be complementary to the DoEHLG 2006 Guidelines.

IWEA Best Practice Principles in Community Engagement and Community Commitment 2013

IWEA extended its guidance with the publication of the '*Best Practice in Community Engagement and Commitment*'. IWEA and its members support the provision of financial contributions by wind farm operators to local communities and have sought to formulate best practice principles for the provision of a community commitment. The community engagement document sets out IWEA's best practice principles for delivering extended benefits to local communities for wind farm developments of 5 Megawatts (MW) or above. Best practice principles of community engagement when planning the engagement strategy and preparing associated literature are also outlined in the document. The aim of this document and associated best practice principles is to ensure that the views of local communities are taken into account at all stages of a development and that local communities can share in the benefits.

DCCAE Code of Practice for Wind Energy Development Ireland – Guidelines for Community Engagement 2016

In December 2016, the then Department of Communications, Climate Action and Environment (DCCAE) issued a Code of Practice for wind energy development in relation to community engagement. The Code of Practice is intended to ensure that wind energy development in Ireland is undertaken in adherence with the best industry practices, and with the full engagement of local communities. Community engagement is required through the different stages of a project, from the initial scoping, feasibility and concept stages, right through from construction to the operational phase. The methods of engagement should reflect the nature of the project and the potential level of impact that it could have on a community. The Code of Practice advises that ignoring or poorly managing community concerns can have long-term negative impacts on a community's economic, environmental or social situation. Not involving communities in the project development process has the potential to impose costly time and financial delays for projects or prevent the realisation of projects in their entirety.

Further details on the community engagement that has been undertaken as part of the Proposed Project are presented below. A Community Engagement Report has been prepared by MKO and is included as Appendix 2-2 to this chapter. This report outlines the steps taken by the Applicant to communicate effectively with the local community in respect of the Proposed Project.

Department Circular PL5/2017

On the 3rd of August 2017, the then Department of Housing, Planning and Local Government (DHPLG) issued Circular PL5/2017 to provide an update on the review of the wind energy and renewable policies in development plans, and the advice contained within a previous Departmental Circular PL20-13. Circular PL20-13 advised that local authorities should defer amending their existing Development Plan policies in relation to wind energy and renewable energy generally as part of either the normal cyclical six-yearly review or plan variation processes and should instead operate their existing development plan policies and objectives until the completion of a focused review of the DoEHLG 2006 Guidelines. The new circular (PL05/217) reconfirms that this continues to be the advice of the Department.

The Circular also set out the four key aspects of a preferred draft approach being developed to address the key aspects of the review of the DoEHLG 2006 Guidelines as follows:

- The application of a more stringent noise limit, consistent with World Health Organisation (WHO) noise standards, in tandem with a new robust noise monitoring regime, to ensure compliance with noise standards;
- A visual amenity setback of 4 times the turbine height between a wind turbine and the nearest residential property, subject to a mandatory minimum distance of 500 metres between a wind turbine and the nearest residential property;
- The elimination of shadow flicker; and
- The introduction of new obligations in relation to engagement with local communities by wind farm developers along with the provision of community benefit measures.

Commission for Regulation of Utilities: Grid Connection Policy

The Commission for Regulation of Utilities (CRU) (previously the Commission for Energy Regulation (CER)) launched a new grid connection policy in March 2018 for renewable and other generators, known as ECP-1, which seeks to allow “shovel ready” projects that already have a valid planning permission, connected to the electricity networks. The principal objective which guides this decision is to allow those projects to have an opportunity to connect to the network, along with laying the foundations for future, more regular batches for connection. August 2018 saw the applicants for new connection capacity under ECP-1 published. ECP-2 was launched in June of 2020, which set policy for at least three annual batches of connection offers (ECP 2.1, ECP-2.2, and ECP-2.3). On 4th April 2023 the CRU published its Decision on ECP-2.4, confirming a fourth batch under the ECP-2 policy. The first four ECP-2 application windows (2.1 -2.3 and -2.4) opened for the month of September each year. The application window for the fifth annual batch (ECP-2.5) closed on the 30th of November 2024. The enduring connection policy regime replaces the previous ‘Gate’ system of grid connection applications. The grid connection application window under ECP-1 was the first time since 2007 that certain renewable energy projects including wind farms had an opportunity to secure a new grid connection offer.

The design of the Proposed Grid Connection has taken account of the “*preferred draft approach*” and accordingly, has been developed with the provisions of the Draft DoHPLG 2019 Guidelines in mind. This grid connection policy will allow for the Proposed Grid Connection, once it is permitted, to connect to the electricity networks under the enduring connection policy regime.

Renewable Energy Support Scheme

CAP25 is the Government’s plan to give Irish people a cleaner, safer and more sustainable future to halve emissions by 2030 and reach net zero no later than 2050. CAP25 sets out actions across every sector which will ensure we meet our future climate commitments. A key part of the CAP25 is to increase the proportion of renewable electricity to up to 80% by 2030, with a target of 9GW from

onshore wind. These measures will be driven the Renewable Electricity Support Scheme ('RESS') which aims to promote the generation of electricity from renewable sources.

The RESS is an auction-based scheme which invites renewable electricity projects to bid for capacity and receive a guaranteed price for the electricity they generate.

RESS 1 was the first RESS run by the Government of Ireland and concluded in 2020. RESS 2 was run in 2022 and concluded in June 2022. The successful projects in RESS 2, the majority of which are now constructed and operational, represent an increase of nearly 20% in Ireland's current renewable energy generation capacity. RESS 3 was ran in concluded in September 2023 and more recently RESS 4 in September 2024. The most recent RESS auction was the RESS 5 auction submissions closed in September 2025, and results were announced later the same month. It secured its full target of around 1,500 GWh of renewable electricity, delivering over 1,000 MW of additional onshore wind and solar capacity.

While significant challenges remain in meeting climate targets, the RESS represents a decisive step forward. It lays the foundation for a more sustainable and cost-effective renewable electricity market, supporting the growth of the green economy, promoting sustainable employment opportunities, and boosting Ireland's energy security as renewables become increasingly competitive.

The Proposed Project is in accordance with the CAP25 and a grant of permission for the onshore wind energy development will allow for the Proposed Project to participate in the RESS auction and contribute renewable energy generation in achieving Ireland's CAP25 target of 9GW of onshore wind generation by 2030, a target that Ireland is not currently on track to meet, as detailed above in Section 2.4.

2.7 Planning History

This section of the EIAR sets out the relevant planning history of the Proposed Project site, within the red line boundary (Figure 1-3 in Chapter 1 Introduction) and, for context, also identifies other wind energy development within the wider area (25km from the proposed turbines).

2.7.1 Planning Applications within the Proposed Project Application Boundary

A planning search was carried out through the national planning application database and ACP's online planning portal in February 2026 for relevant valid planning applications submitted within the past 10 years that fall within or overlap with the red line boundary of the Proposed Project which are outlined in Table 2-2 below. Table 2-3 details valid wind farm applications within 25km of Proposed Wind Farm turbines.

It is noted that the site was subject to industrial scale peat extraction which was permanently ceased at the Proposed Project site in June 2020; decommissioning activities as required by Condition 10 of the IPC Licence are currently ongoing. The ongoing decommissioning and maintenance activities will ensure compliance with BnM's IPC Licence (Ref P0500-01).

Table 2-2 Planning Applications within the Proposed Project Application Boundary

Planning Authority	Pl. Ref.	Description	Planning Authority Decision
An Coimisiún Pleanála	SU19.323676	Substitute Consent under the provisions of Section 177E of the Planning and Development Act 2000 (as amended) for peat extraction and ancillary works. Remedial Natura Impact Statement (rNIS) and Remedial Environmental Impact Assessment Report (rEIAR) was submitted with this application.	Case is due to be decided by 31/03/2026
Offaly County Council	24/75	Continued use of an existing guyed wind monitoring mast, with instruments, 100m in height for a further period of three years. The purpose of the mast is to assess the suitability of the company' s adjacent lands for windfarm development. Previous planning application reference numbers: PL16/341	Granted - 17/09/2024
Offaly County Council	16/341	The erection of a guyed wind monitoring mast, with instruments, up to 100m in height. The purpose of the proposed mast is to assess the suitability of the company's adjacent lands for wind farm development	Granted – 09/02/2017
Offaly County Council	21/208	Renovation & extension of existing derelict dwelling, construction of a domestic garage, installation of an effluent treatment system, access to the public road at an existing entrance and all ancillary works	Granted – 09/02/2022

Table 2-3 Valid Wind Farm Applications within 25km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	Turbine No.	Approx. Distance to Nearest Turbine (km)
Single/Domestic Turbines								
PI Ref. 22537	Kilbeggan Turbine	County Westmeath	Kepak Kilbeggan Unlimited Company	erect a 500kw wind turbine, located at the south area of our waste water treatment plant, with a hub height of 65 meters and a blade diameter of 44 meters, with underground ducting connecting to existing ESB substation and all associated site works.	Granted by WCC on 14/07/2023	Existing	1	17 km
PI Ref. 24/60326 ACP Ref. PL19.321244	Lea Mor Renewable Energy Community Turbine	County Offaly	Lea Mor Renewable Energy Community (REC) Ltd	The construction of one Enercon E138 Wind Energy Converter on an 81m tower with an electrical rating of 4.5MW and an overall tip height of 149.38m.	Refused by OCC on 22/10/2024 and granted by ACP on 23/05/2025	Permitted	1	6.8 km
PI Ref. 114099	James Nally Turbine	County Westmeath	James Nally	Planning permission for a wind turbine to be constructed on an existing agricultural farm and all associated ancillary site works	Granted by WCC on 14/02/2012	Existing	1	18.8 km
Large Wind Energy Applications								
PI Ref. 15/44 ACP Ref. 19.244903	Meenwaun Wind Farm	County Offaly	Meenwaun Wind Farm Ltd	A 10-year permission is requested for a wind farm with up to 5 turbines (maximum tip height of 169m) and associated infrastructure, including turbine foundations, hardstanding areas, a permanent 80m meteorological mast, tree felling, a stream crossing, upgraded and	Granted by OCC on 22/04/2015. Appealed and Granted by	Existing	5	16.4 km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	Turbine No.	Approx. Distance to Nearest Turbine (km)
				new site tracks, a new site entrance, and a borrow pit. Additional facilities include an onsite electrical substation with a control building, a wastewater holding tank, fencing, underground electrical and communications cabling to connect the turbines to the substation, and a temporary construction site compound. The application includes an Environmental Impact Statement (EIS) and a Natura Impact Statement (NIS).	ABP on 21/10/2015			
Pl Ref. 14/188 & 19/404 ACP Ref. 19.244053	Cloghan Wind Farm	County Offaly	Galetech Energy Developments Cloghan Ltd	A 10-year permission is sought for the erection of 9 wind turbines (up to 100m hub height, 150m tip height) and associated works, including a temporary site compound (697 sq.m), turbine foundations, access tracks, underground cabling, an upgraded site entrance off the N62, and a 38kV switch room and control facility (94 sq.m) within a fenced compound. The application is accompanied by an Environmental Impact Statement (EIS) and a Natura Impact Statement (NIS).	Granted by OCC on 07/10/2014. Appealed and Granted by ABP on 27/10/2016	Existing	9	10.8 km
ACP Ref. 306706	Derrinlough Wind Farm	County Offaly	Bord na Móna Powergen Limited	A ten year permission for a wind farm consisting of 21 wind turbines and all associated site works	Granted by ABP on 26/08/2021	Existing	21	10.8 km
ACP Ref. PA19.318816	Cush Wind Farm	County Offaly	Cush Wind Limited	10 year planning permission for wind energy development consisting of 8 no. wind turbines and all associated works	Decision Due	In Planning	8	17.4 km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	Turbine No.	Approx. Distance to Nearest Turbine (km)
PI Ref. 10/130	Leabeg Wind Farm	County Offaly	Gaelectric Developments Ltd	Construction of a windfarm consisting of two wind turbines (hub height not exceeding 85m, blade diameter not exceeding 82.4m) an electrical substation building, construction, extension and upgrade of internal site tracks and associated works	Granted by OCC on 31/05/2010	Existing	2	6.2 km
ACP Ref. PA25M.321595	Umma More Wind Farm	County Westmeath	Umma More Limited	Renewable energy development comprising 9 no. wind turbines and associated infrastructure.	Decision due	Proposed	9	16.2 km

2.8 Scoping and Consultations

2.8.1 Scoping

Scoping is the process of determining the content, depth and extent of topics to be covered in the environmental information to be submitted to a competent authority for projects that are subject to an Environmental Impact Assessment (EIA). This process is conducted by contacting relevant authorities and Non-Governmental Organisations (NGOs) with interest in the specific aspects of the environment with the potential to be affected by the proposal. These organisations are invited to submit comments on the scope of the EIAR and the specific standards of information they require. Comprehensive and timely scoping helps ensure that the EIAR refers to all relevant aspects of the Proposed Project and its potential effects on the environment and provides initial feedback in the early stages of the EIAR preparation, when alterations are still easily incorporated into the design. In this way scoping not only informs the content and scope of the EIAR, but it also provides a feedback mechanism for the proposal design itself.

As part of the constraints mapping process, which is detailed in Chapter 3 of this EIAR, telecommunications operators were contacted in November 2020 (and again in October 2024 and March 2025) in order to determine the presence of telecommunications links or aviation assets traversing or located in close proximity to the Proposed Wind Farm. Following this initial exercise, an EIAR scoping document, providing details of the Proposed Project, was prepared by MKO and circulated in May 2021. The scoping document provided details of the Proposed Project and set out the scope of work for the EIAR. Consultees were invited to contribute to the EIAR by suggesting baseline data, survey techniques and potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR.

An updated EIAR scoping document was issued to consultees in March 2025 due to time elapsed from when previous scoping was carried out, updates in local and national policy and legislation, updates in relevant EIAR guidance, changes in the environmental baseline and refinement of the Proposed Project layout and design. These update and changes were reflected in the updated scoping document and consultees were invited to contribute again to the EIAR.

2.8.2 Scoping Responses

The bodies engaged with at scoping stage are set out below in Table 2-4. Further to this, responses received from the scoping document circulated are set out in Table 2-6 below. Copies of all scoping responses received are included in **Appendix 2-1** of this EIAR. If further responses are received, the comments of the consultees will be considered, where applicable, in the construction, operation and decommissioning of the Proposed Project in the event of a grant of planning permission. The recommendations of the consultees have informed the scope of the assessments undertaken and the contents of the EIAR.

Table 2-4 Scoping List and Responses

No.	Consultee	Date of Response Initial Scoping	Date of Response Updated Scoping
General Scoping			
1	AirNav	Not included in 2021 scoping	No response received
2	An Taisce	No response received	No response received
3	Broadcasting Authority of Ireland (BAI)	Response received 5 th May 2021	Response received 23 rd October 2024
4	Bat Conservation Ireland	No response received	No response received

No.	Consultee	Date of Response Initial Scoping	Date of Response Updated Scoping
5	BirdWatch Ireland	No response received	No response received
6	Butterfly Conservation Ireland	No response received	No response received
7	Commission for Communications Regulation	Not included in 2021 scoping but consulted in 2020 for Telecommunications Scoping.	No response received
8	Commission for Regulation of Utilities Water and Energy	No response received	No response received
9	Department of Agriculture, Food and the Marine	Response received 5 th May 2021	No response received
10	Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media	No response received	No response received
11	Department of the Environment, Climate and Communications	No response received	No response received
12	Department of Defence	No response received	Response received 8 th November 2024
13	Department of Transport	Response received 18 th May 2021	Response received 26 th November 2024
14	Department of Housing, Local Government and Heritage (includes National Parks & Wildlife Service (NPWS), National Monuments Service (NMS))	No response received	Response received 23 rd October 2024 Meeting held on 11/11/2025 w/ NMS and 25/11/2025 w/ NPWS. Please see Section 2.8.3.1.3 below for further details.
15	Eastern and Midland Regional Assembly	No response received	No response received
16	Environmental Protection Agency	Response received 25 th June 2021	No response received
17	ESB Telecoms	No response received	Refer to telecoms scoping
18	Eirgrid	No response received	No response received
19	Fáilte Ireland	Response received 7 th May 2021	Response received 6 th November 2024
20	Geological Survey of Ireland	Response received 21 st May 2021	Response received 15 th November 2024
21	Health Service Executive	Response received 2 nd June 2021	Response received 4 th December 2024
22	Inland Fisheries Ireland	Response received 16 th June 2021	No response received
23	Irish Aviation Authority	Response received 25 th May 2021	Response received 22 nd November 2024
24	Irish Peatland Conservation Council	No response received	No response received
25	Irish Rail	Not included in 2020 scoping	Response received 14 th March 2025

No.	Consultee	Date of Response Initial Scoping	Date of Response Updated Scoping
26	Irish Red Grouse Association	No response received	No response received
27	Irish Raptor Study Group	No response received	No response received
28	Sports Ireland	No response received	Response received 6 th December 2024
29	Irish Water	No response received	No response received
30	Irish Wildlife Trust	No response received	No response received
31	Office of Public Works	No response received	No response received
32	Offaly County Council	Response received 25 th May 2021	Response received 22 nd November 2024
33	Sustainable Energy Authority of Ireland	No response received	No response received
34	The Heritage Council	No response received	No response received
35	Transport Infrastructure Ireland	Response received 17 th May 2021.	Response received 14 th November 2024
36	Uisce Eireann (Formerly Irish Water)	Not included in 2021 scoping	No response received
37	Westmeath County Council - Planning Department	No response received	Not included in 2024 scoping.
38	Waterways Ireland	No response received	Response received 21 st October 2024
39	2m (RTE Transmission Network Ltd)	Not included in 2021 scoping but consulted in 2020 for Telecommunications Scoping.	Response received 23 rd and 24 th October 2024
Telecommunications and Aviation Scoping			
1	Coimisiún na Meán (formerly Broadcasting Authority of Ireland (BAI))	Response received 26 th November 2020	Response received 14 th March 2025
2	BT Communications Ireland	Response received 11 th November 2020	Response received 25 th March 2025
3	Cellnex	Not included in 2020 scoping	No response received
4	Dense Air	Not included in 2020 scoping	No response received
5	Eir (Formerly Meteor)	Response received 26 th November 2020	Response received 19 th March 2025
6	ENET	Response received 11 th November 2020	Response received 14 th March 2025
7	EOBO Ltd	Not included in 2020 scoping	No response received
8	ESB Telecoms	Response received 20 th November 2020	Response received 22 nd April 2025
9	JFK Communications Ltd	Not included in 2020 scoping	No response received

No.	Consultee	Date of Response Initial Scoping	Date of Response Updated Scoping
10	Hibernian Towers	Not included in 2020 scoping	Response received 25 th March 2025
11	Imagine Group	Response received 16 th November 2020	Response received 14 th March 2025
12	Ivertex Ltd	Not included in 2020 scoping	Response received 14 th March 2025
13	JS Whizzy Internet Limited	Not included in 2020 scoping	Response received 19 th March 2025
14	Lackabeha Services Ltd T/A Airwaves Internet	Not included in 2020 scoping	Response received 14 th March 2025
15	MP&E Trading Company Ltd/ EMR Integrated Solutions	Response received 13 th November 2020	Response received 24 th March 2025
16	NBI Infrastructure DAC	Not included in 2020 scoping	Response received 24 th March 2025
17	Ripplecom	Response received 11 th November 2020	No response received
18	RTE Transmission Network (2rn)	Response received 12 th November 2020	Response received 14 th March 2025
19	Tetra Ireland Communications (emergency services)	Response received 13 th November 2020	No response received
20	Three Ireland	Response received 13 th November 2020	Response received 14 th March 2025
21	Towercom	Response received 3 rd November 2020	Response received 21 st March 2025
22	Virgin Media	Response received 12 th November 2020	Response received 20 th March 2025
23	Viatel Ireland Ltd	Response received 12 th January 2021	No response received
24	Vodafone Ireland	Response received 12 th December 2020	Response received 20 th March 2025
25	Western Broadband Network	Not scoped initially	Response received 14 th March 2025
26	St Brigid's Credit Union Ltd., County Offaly	Response received 26 th November 2020	Response received 24 th March 2025

Table 2-5 Summary of response received from Consultees

No.	Consultee	Date of Response	Response Summary Initial Scoping	Response Summary Updated Scoping	Addressed in Chapter
General Scoping					
1	Coimisiún na Meán (formerly Broadcasting Authority of Ireland (BAI))	Initial: 5 th May 2021 Update: 23 rd October 2024	The BAI does not perform an in-depth analysis of the effect of wind turbines on FM networks. However, the BAI states they are not aware of any issues from existing windfarms into existing FM networks. Also, the proposed windfarm is not located close to any existing or planned FM transmission sites	Coimisiún na Meán does not perform an in-depth analysis of the effect of wind turbines or electrical substations on FM networks. However, they are not aware of any issues from existing windfarms or electrical substations into existing FM networks. Also, the proposed substation is not located close to any existing or planned FM transmission sites	Chapter 15: Material Assets
2	Department of Agriculture, Food and the Marine	Initial: 5 th May 2021 Update: No response received	Letter summarising requirement for felling licence if the Proposed Project involves felling/removal of trees.	No response received.	Chapter 4: Description of the Proposed Project Chapter 6: Biodiversity
3	Department of Defence	Initial: No response received Update: 8 th November 2024	No response received.	Letter provided stating that the Department of Defence does not provide observations or advice in the scoping process, except where the relevant parties have been directed by a planning authority to seek the Department's views. An observation was made relating to turbine lighting requirements and obstacle lighting requirements.	Chapter 15: Material Assets

No.	Consultee	Date of Response	Response Summary Initial Scoping	Response Summary Updated Scoping	Addressed in Chapter
4	Department of Transport	Initial: 18 th May 2021 Update: 26 th November 2024	<p>The Proposed Project especially the connection cables to national grid will have effects on both the environment and the Regional and local road network.</p> <p>Guidance on the placement of cables within the extents of the (regional and local) public road network was provided.</p> <p>Provided a list of items to be considered during the examination of the proposal including an examination of alternative cable routing.</p> <p>Provided conditions for the [Coimisiún] to consider should the decision result in proposal.</p>	The Department has no comment to make at this point in time. It requested to be notified of further updates in the future.	<p>Chapter 3: Site Selection and Reasonable Alternatives</p> <p>Chapter 4: Description of the Proposed Project</p> <p>Chapter 15: Material Assets</p>
5	Department of Housing, Local Government and Heritage (includes National Parks & Wildlife Service, National Monuments Service)	Initial: No response received Update: 23 rd October 2024	No response received.	<p>The National Monuments Service noted that the landscape around the townland of Lemanaghan and its surrounding townlands is a peatland environment that has a high concentration of recorded monuments. This peatland landscape as a high potential for archaeological features to be uncovered during the course of any future development works.</p> <p>A full archaeological impact assessment report is recommended that includes the results and detailed field survey and should be informed by further archaeological assessment i.e. pre-</p>	Chapter 13: Cultural Heritage

No.	Consultee	Date of Response	Response Summary Initial Scoping	Response Summary Updated Scoping	Addressed in Chapter
				planning test trenching and geophysical survey where site conditions are suitable.	
6	Environmental Protection Agency	Initial: 25 th June 2021 Update: No response received	A letter was provided detailing the minimum level of scope and detail required in the EIAR. The EPA also issued responses from Offaly County Council, Fáilte Ireland and the Department of Environment, Climate and Communications.	No response received.	All chapters
7	Fáilte Ireland	Initial: 7 th May 2021 Update: 6 th November 2024	Provided EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects.	Provided EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects.	Chapter 5: Population and Human Health
8	Geological Survey of Ireland	Initial: 21 st May 2021 Update: 15 th November 2024	Provided a link to a list of publicly available datasets which are recommended to be used when conducting the EIAR, SEA, planning and scoping processes. The Letter also outlined that the audit for Co. Offaly was carried out in 2016 and reveals that a CGS (Clonmacnoise Esker) is present adjacent to the Proposed Wind Farm. No impacts are currently envisaged, but GSI requested that any proposed access roads, road upgrades or ancillary works impact to esker or wider county geological site. They request to be contacted if the proposed development plan is altered. The Groundwater Data Viewer indicates a 'Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones' and a 'Locally Important Aquifer - Bedrock which is Generally	Provided a link to a list of publicly available datasets which are recommended to be used when conducting the EIAR, SEA, planning and scoping processes. Detailed specific data for Environmental Assessment and Planning topics under the following headings: <ul style="list-style-type: none"> ➤ Land and soils ➤ Water ➤ Climate Change ➤ Cultural Heritage ➤ Material Assets ➤ The Landscape and ➤ Other Relevant Data 	Chapter 8: Land, Soils and Geology Chapter 9: Water

No.	Consultee	Date of Response	Response Summary Initial Scoping	Response Summary Updated Scoping	Addressed in Chapter
			<p>Moderately Productive’ underlie the Proposed Project. A ‘Locally important gravel aquifer’ is located adjacent to the wind farm boundary area. The Groundwater Vulnerability map indicates the area covered is variable. GSI would therefore recommend use of the Groundwater Viewer to identify areas of High to Extreme Vulnerability and ‘Rock at or near surface’ in the assessments.</p> <p>GSI also recommends referring to the Groundwater Protection Response overview, GSI online datasets of bedrock and subsoils geological mapping, geotechnical database resources, Aggregate Potential Mapping, .and baseline geochemistry data from the Tellus programme.</p> <p>GSI recommend geohazards are taken into consideration.</p> <p>GSI request that should the development go ahead, a copy of reports detailing site investigations would be appreciated.</p>	<p>As in 2021, the letter outlined that the audit for Co. Offaly was carried out in 2016 and reveals that a CGS (Clonmacnoise Esker) is present adjacent to the Proposed Wind Farm. No impacts are currently envisaged, but GSI requested that any proposed access roads, road upgrades or ancillary works impact to esker or wider county geological site. They request to be contacted if the proposed development plan is altered.</p> <p>GSI request that should the development go ahead, a copy of reports detailing site investigations would be appreciated.</p>	
9	Health Service Executive	Initial: 2 nd June 2021 Update: 4 th December 2024	<p>Provided general guidance for EIAR sections and chapters from a health perspective including:</p> <ul style="list-style-type: none"> ➤ Documents to be considered throughout the EIAR. ➤ Recommendations surrounding public consultations. ➤ EIAR should detail information surrounding decommissioning, including eventual fate of materials, 	<p>As per 2024 with the updated guidance and the following additional observations:</p> <ul style="list-style-type: none"> ➤ The applicant should also consider the findings of the High Court judgement issued in the judicial review of the Derryadd Wind Farm (2121 IEHC 390 [20202 No 557 JR] P. Sweetman v An Coimisiún Pleanála. 	<p>Chapter 1: Introduction</p> <p>Chapter 3: Site Selection and Reasonable Alternatives</p>

No.	Consultee	Date of Response	Response Summary Initial Scoping	Response Summary Updated Scoping	Addressed in Chapter
			<ul style="list-style-type: none"> ➤ EIAR should include map and description of proposed turbine locations. ➤ The Proposed Project should be assessed with a view of including health gains. ➤ Recommendations surrounding noise assessment within the EIAR. ➤ Recommend that a shadow flicker assessment is carried out. ➤ Measures surrounding air quality during construction works are recommended. ➤ Drinking water sources should be identified. Any potential impacts should be assessed. ➤ Assessment of geological impacts and all proposed mitigation measures should be detailed in the EIAR. ➤ EIAR should detail the location of on site facilities. <p>Specific to the Proposed Project, the HSE notes that should the proposed Lemanaghan Wind Farm be granted planning permission, there will be between 49 and 53 wind turbines within 20km of the proposed site. The cumulative impact on sensitive receptors of the Proposed Wind Farm when considered with other wind farms in the vicinity should be addressed in the EIAR.</p>	<ul style="list-style-type: none"> ➤ Recommends a detailed Peat Stability/Geotechnical Assessment should be undertaken to assess the suitability of the soil for the proposed development. The EIAR should include provision for a peat stability monitoring programme to identify early signs of potential bog slides. 	<p>Chapter 4: Description of the Proposed Project</p> <p>Chapter 5: Population and Human Health</p> <p>Chapter 8: Land, Soils and Geology</p> <p>Chapter 9: Water</p> <p>Chapter 10: Air Quality</p> <p>Chapter 11: Climate</p> <p>Chapter 12: Noise and Vibration</p>
10	Inland Fisheries Ireland	Initial: 16 th June 2021	IFI provided a letter with their initial concerns and recommendations in relation to the Proposed Project.	No response received.	Chapter 6: Biodiversity

No.	Consultee	Date of Response	Response Summary Initial Scoping	Response Summary Updated Scoping	Addressed in Chapter
		Update: No response received	<p>IFT's main concerns main concerns in relation to this development will be the protection of the aquatic resource and the associated riparian habitat. In particular the protection of streams such as the Lemanaghan and Castlearmstrong streams that cross or bound the proposed site and which feed into the Brosna River.</p> <p>Observations were made on the following:</p> <ul style="list-style-type: none"> ➤ Aquatic biodiversity assessment of drainage-receiving watercourses. ➤ Requirement for the aquatic habitat and physical nature to be described and surveyed in detail. ➤ Soils and soil structure. ➤ Recommendation for the employment of specialist personnel to assess soil strength and ground suitability. ➤ Potential for soil movement and landslides. ➤ Hydrology at the site of excavations. ➤ Drainage during the construction and operational phase. ➤ Disposal of waste materials. ➤ Provision of details for site offices and services. ➤ Avoidance of sedimentary rocks during road construction. ➤ Requirement for consultation with IFI prior to watercourse crossings. ➤ Timing of any instream works. ➤ Inclusion of monitoring proposals in the EIAR. ➤ Maintenance of a sufficient bank side riparian zone. 		<p>Chapter 8: Land Soils and Geology</p> <p>Chapter 9: Water</p>

No.	Consultee	Date of Response	Response Summary Initial Scoping	Response Summary Updated Scoping	Addressed in Chapter
			Should works be approved a finalised CEMP must be agreed with Inland Fisheries Ireland before works commence.		
11	Irish Aviation Authority	Initial: 25 th May 2021 Update: 22 nd November 2024	The IAA noted that the development appears to be approximately 29 km Northeast of Birr Airport and 40 km Northwest of Clonbullogue Airport. Therefore, IAA state it is likely for the following general observations to be preferred during the formal planning process: <ul style="list-style-type: none"> ➤ Agree an aeronautical obstacle warning light scheme for the wind farm development. ➤ Provide as-constructed coordinates in WGS84 format together with above mean sea level tip height elevations at each wind turbine location. ➤ Notify the Authority of intention to commence crane operations with at least 30 days prior notification of their erection. 	As per 2021.	Chapter 15: Material Assets
12	Irish Rail	Initial: Not included Update: 14 th March 2025	N/A	GSM-R Train Radio in service along operational railway line approximately 2.9 km north and 3 km northeast of the Proposed Wind Farm.	Chapter 15: Material Assets
13	Sports Ireland	Initial: No response received Update: 6 th December 2024	No response received.	No trails are registered in the land highlighted for the Proposed Project.	NA
14	Offaly County Council	Initial: 25 th May 2021	Offaly County Council advised that given the workload currently being experienced by the Local Authority, the	As this is a proposed SID, Offaly County Council cannot provide a formalised scoping	NA

No.	Consultee	Date of Response	Response Summary Initial Scoping	Response Summary Updated Scoping	Addressed in Chapter
		Update: 22 nd November 2024	Planning Authority will not be providing a response to MKO until a formal scoping request is submitted by them	response in accordance with the requirements of the planning acts as this is a function of An Coimisiún Pleanála.	
15	Transport Infrastructure Ireland	Initial: 17 th May 2021 Update: 14 th November 2024	<p>Specifically for the site, TII notes the proposed site adjoins the N62, national road, at a location on the network that is subject to a general 100kph speed limit. In such circumstances, the developer/applicant should be aware that official policy concerning access to national roads seeks to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses (i.e. non-public road access) to national roads, to which speed limits greater than 50kph apply. Therefore, there are policy and road safety considerations that would need to be resolved in any subsequent application, including in relation to any future associated amenity uses, and available alternative arrangements to the local and regional road network should be utilised.</p> <p>TII identified a series of general guidance, to which the developer should have regard. These items relate to the following:</p> <ul style="list-style-type: none"> ➤ Consultations with the relevant Local Authority/National Roads Design Office. ➤ Impacts on the national road network. ➤ Visual impacts. ➤ Conditions and/or modifications imposed by An Coimisiún Pleanála. 	<p>Similar to 2021, TII noted that the proposed site adjoins the N62, a national road, at a location on the network that is subject to a general 100km/h speed limit. In such circumstances, the developer/applicant should be aware that official policy concerning access to national roads seeks to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses (i.e. non-public road access) to national roads, to which speed limits greater than 50km/h apply. Therefore, there are policy and road safety considerations that would need to be resolved in any subsequent application, including in relation to any future associated amenity uses, and available alternative arrangements to the local and regional road network should be utilised.</p> <p>TII again identified a series of general guidance, to which the project promoter should have regard. These items relate to the following:</p> <ul style="list-style-type: none"> ➤ National road network. ➤ TII publications. ➤ TII environmental assessment guidance. 	<p>Chapter 3: Site Selection and Reasonable Alternatives</p> <p>Chapter 12: Noise and Vibration</p> <p>Chapter 14: Landscape and Visual</p> <p>Chapter 15: Material Assets</p>

No.	Consultee	Date of Response	Response Summary Initial Scoping	Response Summary Updated Scoping	Addressed in Chapter
			<ul style="list-style-type: none"> > Guidance documents and regulations relating to the following: <ul style="list-style-type: none"> ○ Road Works, ○ Air Quality, ○ Noise. > Traffic and Transport Assessment. > Road Safety Audits. > Maintaining the safety and standard of the national road network. > Haul routes. > Grid connection and cable routing proposals. 	<ul style="list-style-type: none"> > Haul routes utilising the road network. > National road crossings. > Potential cable routing. 	
16	Waterways Ireland	Initial: No response received Update: 21 st October 2024	No response received.	The Proposed Project is not within the Zone of Influence of any Waterways Ireland Waterways. Therefore, Waterways Ireland will not be commenting.	NA
17	2rn (RTE Transmission Network Ltd)	Initial: Only telecoms scoping Update: 23 rd and 24 th October	N/A	An off-air link is located at Cairn Hill and Kilduff. However, the proposed turbine locations are no risk to our fixed linking There is also a risk of interference to broadcast services in the area, and 2rn requested a protocol be signed between the developer and 2rn should the site go ahead.	Chapter 15: Material Assets
Telecommunications and Aviation Scoping					
1	Coimisiún na Meán (formerly Broadcasting Authority of Ireland (BAI))	Initial: 26 th November 2020	No potential for interference.	No potential for interference.	Chapter 15: Material Assets

No.	Consultee	Date of Response	Response Summary Initial Scoping	Response Summary Updated Scoping	Addressed in Chapter
		Update: 14 th March 2025			
2	BT Communications Ireland	Initial: 11 th November Update: 25 th March 2025	No potential for interference.	No potential for interference.	Chapter 15: Material Assets
3	Eir (Formerly Meteor)	Initial: 26 th November 2020 Update: 19 th March 2025	No potential for interference.	Identified 1 no. link with potential to be affected and required buffer.	Chapter 15: Material Assets
4	ENET	Initial: 11 th November 2020 Update: 14 th March 2025	Identified 5 no. links with potential to be affected and required buffers.	3 no. links in area, however there is no overlap.	Chapter 15: Material Assets
5	ESB Telecoms	Initial: 20 th November 2020 Update: 22 nd April 2025	No potential for interference.	No potential for interference.	Chapter 15: Material Assets
6	Hibernian Towers	Initial: Not included Update: 25 th March 2025	N/A	No potential for interference.	Chapter 15: Material Assets

No.	Consultee	Date of Response	Response Summary Initial Scoping	Response Summary Updated Scoping	Addressed in Chapter
7	Imagine Group	Initial: 16 th November 2020 Update: 14 th March 2025	No potential for interference.	No potential for interference.	Chapter 15: Material Assets
8	Ivertex Ltd	Initial: Not included Update: 14 th March 2025	N/A	No potential for interference.	Chapter 15: Material Assets
9	JS Whizzy Internet Limited	Initial: Not included Update: 19 th March 2025	N/A	No potential for interference.	Chapter 15: Material Assets
10	Lackabeha Services Ltd T/A Airwaves Internet	Initial: Not included Update: 14 th March 2025	N/A	No potential for interference.	Chapter 15: Material Assets
11	MP&E Trading Company Ltd/ EMR Integrated Solutions	Initial: 13 th November 2020 Update: 24 th March 2025	No potential for interference.	No potential for interference.	Chapter 15: Material Assets
12	NBI Infrastructure DAC	Initial: Not included Update: 24 th March 2025	N/A	No potential for interference.	Chapter 15: Material Assets

No.	Consultee	Date of Response	Response Summary Initial Scoping	Response Summary Updated Scoping	Addressed in Chapter
13	Ripplecom	Initial: 11 th November Update: No response	Identified 1 no. link and required buffer.	No response received.	Chapter 15: Material Assets
14	RTE Transmission Network (2rn)	Initial: 12 th November 2020 Update: 14 th March 2025	Protocol to be signed by Bord na Móna for Digital Terrestrial Television (DTT) Coverage.	Protocol to be signed by Bord na Móna for DTT Coverage.	Chapter 15: Material Assets
15	Tetra Ireland Communications (emergency services)	Initial: 13 th November 2020 Update: No response	No potential for interference.	No response received.	Chapter 15: Material Assets
16	Three Ireland	Initial: 13 th November 2020 Update: 14 th March 2025	Yes identified 2 no. links and required buffers.	No potential for interference.	Chapter 15: Material Assets
17	Towercom	Initial: 3 rd November 2020 Update: 21 st March 2025	No potential for interference.	No potential for interference.	Chapter 15: Material Assets
18	Virgin Media	Initial: 12 th November 2020	Identified 1 no. link and required buffer.	Identified 1 no. link and required buffer.	Chapter 15: Material Assets

No.	Consultee	Date of Response	Response Summary Initial Scoping	Response Summary Updated Scoping	Addressed in Chapter
		Update: 20 th March 2025			
19	Viatel Ireland Ltd	Initial: 12 th January 2021 Update: No response	No potential for interference.	No response received.	Chapter 15: Material Assets
20	Vodafone Ireland	Initial: 12 th December 2020 Update: 20 th March 2025	Identified 2 no. links and required buffers.	Identified 2 no. links and required buffers.	Chapter 15: Material Assets
21	Western Broadband Network	Initial: Not scoped Update: 14 th March 2025	N/A	No potential for interference.	Chapter 15: Material Assets
22	St Brigid's Credit Union Ltd., County Offaly	Initial: 26 th November 2020 Update: 24 th March 2025	No potential for interference.	No potential for interference.	Chapter 15: Material Assets

2.8.3 Other Consultations

2.8.3.1 Pre-Planning Meetings

2.8.3.1.1 Offaly County Council

First Pre-Application Meeting (Section 247)

Members of the project team and the Applicant met with representatives from Offaly County Council (OCC) in accordance with Section 247 of the Planning Act via Microsoft (MS) Teams on the 30th of June 2021. Those in attendance were:

On behalf of Offaly County Council:

- > Andrew Murray
- > Carroll Melia
- > Willie Ryan
- > Joe Dunican
- > John McNally
- > Una McCafferkey

On behalf of Agent and Applicant:

- > Caitriona Carter – BnM
- > Lorraine Meehan – MKO
- > Jimmy Green - MKO
- > Paul Sweeney - MKO

The project team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- > A high-level overview of the Proposed Project and the subject site.
- > An introduction to the Applicant.
- > Overview of relevant planning policy including compliance with local wind energy policy.
- > Provided specific details of the scheme relating to LVIA and Ecology.
- > Discussed scoping and pre-application/public consultation undertaken to date.
- > Set out the scope of the Environmental Impact Assessment Report to be undertaken.
- > Set out the projected project timelines.

Following this presentation, there was further discussion held between the project team and the representatives of Offaly County Council. Matters discussed included:

- > Archaeological heritage relevant detailed archaeological assessment.
- > Requested inclusion of photomontages from locations used previously (e.g., Lough Boora).
- > Emphasis on clear explanations of photomontage locations for layperson understanding.
- > The need for detailed recreation and amenity proposals, including connections to the midland cycling route.
- > Community benefits ought to be a strong component of the application.
- > Haul routes for turbine and material delivery should be identified and align with standard road approaches.
- > Grid connection cabling should minimise road network impacts.

Second Meeting

Members of the project team and the Applicant met with representatives from Offaly County Council to provide an update on the project and to discuss certain aspects of the Proposed Project. The meeting was held via Microsoft (MS) Teams on the 12th June 2025. Those in attendance were:

On behalf of Offaly County Council:

- Lorraine Mitchell (Acting Senior Planner)
- Edward Kelly (Town Planner)
- Ben McArdle (Senior Executive Engineer)
- Joe Dooley (Senior Executive Engineer)
- Brian Keenaghan (Area Engineer)

On behalf of Agent and Applicant:

- Sean Cunniffe - Lemanaghan Wind Farm DAC
- Paul Bonar - Lemanaghan Wind Farm DAC
- Caroline Donnelly - Lemanaghan Wind Farm DAC
- Emma Cross - Lemanaghan Wind Farm DAC
- Conor McGrath - Lemanaghan Wind Farm DAC
- Ronan Dunne - MKO
- Catherine Johnson - MKO
- Kate Mahony - MKO

The project team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- Overview of the site layout and site constraints
- Wind energy policy and zoning
- Amenity infrastructure and connections
- Landscape and visual impact assessment including photomontage viewpoint locations
- Site entrance to facilitate each stage of the Proposed Project
- Archaeological assessment
- Consultations to date
- Project timeline update

Following this presentation, there was further discussion held between the project team and the representatives of Offaly County Council. Matters discussed included:

- Public consultation response
- Peatland rehabilitation
- Car park provisions post construction
- Wind Farm signage
- EIAR layout
- Haul routes, road conditions and reinstatement

2.8.3.1.2 **An Coimisiún Pleanála**

Section 37B Consultation

The Applicant engaged with An Coimisiún Pleanála (ACP), then An Bord Pleanála, under the provisions of Section 37B of the Planning and Development Act 2000 (as amended), as to whether the Proposed Project would meet the thresholds of the Seventh Schedule of the Planning and Development Act, 2000, as amended. The Applicant opened consultations with the Coimisiún in September 2021 in relation to a Proposed Project of between 13 and 17 no. wind turbines with an overall ground to blade

tip height of up to 220m and all associated works including, associated hardstands, electrical cabling, site development works, and permanent extension to the grid connection, with the potential for the wind farm to generate greater than 50 Megawatts (MW) of electricity to the National Grid.

A SID meeting under the provisions of Section 37B was held with the ACP on the 23rd of September 2021. Those in attendance were:

On behalf of An Coimisiún Pleanála:

- > Ciara Kellet
- > Sarah Lynch
- > Sarah Caulfield

On behalf of Agent and the Project Team:

- > Caitriona Carter – BnM
- > Sean Creedon – BnM
- > David Naughton – MKO
- > Jimmy Green - MKO
- > Meabhann Crowe - MKO

The design team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- > A High-level overview of the Proposed Project and the Subject Site.
- > Introduction to the Applicant.
- > Overview of planning policy including compliance with local wind energy policy.
- > Provided specific details of the scheme relating to LVIA, Ecology and Aviation.
- > Set out the scope of the Environmental Impact Assessment Report to be undertaken.
- > Discussed scoping & pre-application/public consultation undertaken to date.
- > Set out the projected project timelines.
- > Discussed the relevant Strategic Infrastructure Development criteria as set out in the 7th Schedule of the Planning Act.

Following this presentation, there was further discussion held between the project team and the representatives of ACP. Matters discussed included:

- > Surveys carried out to date
- > Turbine foundations and the impact on hydrology
- > EPA licencing and rehabilitation plans
- > Risk of peat slippage
- > Landownership

Second Meeting

A Second pre-application meeting was held with ACP (then An Bord Pleanála) via Microsoft (MS) Teams on 23rd January 2025. Those in attendance were:

On behalf of ACP:

- > Sarah Lynch
- > Ellen Moss

On behalf of Agent and Applicant:

- > Conor McGrath - Lemanaghan Wind Farm DAC

- > Muriel Ennis - Lemanaghan Wind Farm DAC
- > Paul Bonar - Lemanaghan Wind Farm DAC
- > Sean Cunniffe - Lemanaghan Wind Farm DAC
- > Ronan Dunne – MKO
- > John Willoughby – MKO
- > Catherine Johnson - MKO
- > Ellen Costello – MKO
- > Susan Doran - MKO

The design team gave an update of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- > An introduction to Proposed Project, the site, and the Applicant
- > An overview of designated sites surrounding the site
- > A description of the design process and the constraints assessments carried out to date
- > Details of the turbine delivery route
- > An overview of the planning policy context
- > The scope of the Environmental Impact Assessment Report being undertaken
- > Consultation to date and the Proposed Project timeline
- > The relevant Strategic Infrastructure Development criteria as set out in the 7th Schedule of the Planning Act.

Following this presentation, there was further discussion held between the project team and the representatives of ACP. Matters discussed included:

- > The grid connection
- > Public consultation
- > Changes to the wind farm design
- > Ornithology and the results of surveys to date
- > Closure of the SID pre-application process

Third Meeting

Following the transposition of some of the provisions of RED III into national law through the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. No. 274 of 2025) in August 2025, a third pre-application meeting was held with ACP via Microsoft (MS) Teams on the 10th December 2025. Those in attendance were:

On behalf of ACP:

- > Una Crosse
- > Naill Haverty
- > Fiona Petterson
- > Finbar Quigley
- > Paula Kearney
- > Ellen Moss

On behalf of Agent and Applicant:

- > Caitriona Carther - Lemanaghan Wind Farm DAC
- > Laura Burke - Lemanaghan Wind Farm DAC
- > Muriel Ennis - Lemanaghan Wind Farm DAC
- > Paul Bonar - Lemanaghan Wind Farm DAC
- > Sean Cunniffe - Lemanaghan Wind Farm DAC
- > David Naughton – Lemanaghan Wind Farm DAC

- > Ronan Dunne – MKO
- > Mike Amiel Mekell – MKO
- > Catherine Johnson - MKO
- > Ellen Costello – MKO
- > Sorcha Shanley – MKO
- > Edel Mulholland – MKO
- > Jack Workman – MKO
- > Dija Mazonaite – MKO
- > Padraig Cregg- MKO
- > Miriam Carroll – Tobar Archaeology

The design team gave a PowerPoint presentation based on the agenda set by ACP which set out the following information:

- > Proposed Project Update
- > Planning and EPA Status
- > Policy Context
- > Consultation with Statutory Bodies & the Public
- > Consideration of Connectivity to European Sites
- > Environmental Considerations with particular reference to:
 - Baseline Environment
 - Biodiversity
 - Ornithology
 - Hydrology and Hydrogeology and Peat Stability
 - Noise & Shadow Flicker
 - Landscape & Visual Impact
 - Cultural Heritage
 - Other Material Assets
 - Cumulative Impacts
- > Grid Connection and TDR
- > Planning Application Documents and Lodgement Timeline

Following this presentation, there was further discussion held between the project team and the representatives of ACP. Matters discussed included:

- > Presentation of the planning application, EIAR and NIS.
- > Wind energy designations
- > Lemanaghan substitute consent application and IPC licence
- > Consultation with the Local Authority and other relevant bodies
- > Consultation with the community and the community benefit fund
- > Residential amenity
- > Cultural heritage
- > Noise and Vibration
- > Potential impacts on biodiversity and ornithology and associated enhancements measures
- > Cumulative impacts
- > Drainage and water quality
- > Peatlands and peat stability
- > Pre-application consultation close out and procedures for making an application

SID Determination

A letter received from An Coimisiún Pleanála dated the 3rd March 2026 stated that under Section 37B (4)(A), it is the opinion of the Commission that the Proposed Project falls within the scope of the paragraphs 37A(2)(a) and (b) of the Planning and Development Act 2000 (as amended). This confirmed that the Proposed Project constitutes SID and therefore the planning application should be made directly to An Coimisiún Pleanála.

2.8.3.1.3 Consultations with Other Statutory Consultees

National Parks and Wildlife Service

Members of the Project Team, including Environmental Scientists, Ecologists and Ornithologists met with the NPWS on the 25th of November 2025 to discuss the Proposed Project. The main topics discussed in the meeting included the following:

- An overview of the Proposed Project.
- Ecological surveys which have been undertaken to date and their findings.
- Ornithology surveys which have been undertaken to date and their findings.
- Proposed plans for habitat enhancement and management measures.

Further detail on this meeting can be found in Chapter 6 of the EIAR.

National Monuments Service

Members of the Project Team, including Environmental Scientist, Landscape and Visual Specialists, and Archaeologist's met with the NMS on the 11th of November 2025. The meeting was held to discuss the likely effects of the Proposed Project on the cultural heritage within the Proposed Project site. The topics discussed at the meeting centred around ensuring robust coverage of cultural heritage within the Proposed Project site and in the vicinity, as well as NMS recommendations for the Proposed Project, which have been taken into account by the Project Team.

Further detail on this meeting can be found in Chapter 13 and Chapter 14 of the EIAR.

The outcomes of these consultations have been duly considered and integrated into the design of the Proposed Project and the preparation of this EIAR.

2.9 Community Consultation

Between 2021 and 2025, BnM, and later the Applicant, undertook an extensive and structured community engagement programme for the Proposed Project. This Programme was adapted throughout to reflect evolving Covid 19 public health restrictions and incorporated household outreach, virtual platforms, in-person clinics, communication with elected representatives, and a public information event.

The Community Engagement Strategy for the Proposed Project was based around engaging with the local community in an open, honest and transparent manner with the aim to not only provide clear and understandable information but also to gain feedback to understand the views of the local community. The feedback and information have been used to inform the design process.

The Proposed Project was launched in March 2021. Covid-19 restrictions prohibited any house-to-house activity in particular knocking on doors to speak with residents until April 2021, when an easing of restrictions enabled Community Liaison Officers to conduct limited house-to-house activities.

To inform local residents about the Proposed Project, a project Community Liaison Officer (CLO) was appointed, and an introductory information pack was delivered in April 2021 via door-door to all householders within a c.2km radius of the area of the site. All the information sent to the local community was also made available for public viewing on the project information website, which went live in March 2021. The information contained in the pack and distributed to each household consisted of the following:

- > A project information brochure;
- > An A2 double-sided map outlining the study area for the Proposed Project;
- > Dedicated contact details (name, phone and email) for the CLO in relation to the project, along with a web address for the dedicated project website;
- > A feedback questionnaire;
- > A consent form to join the project's mailing list; and
- > A communications opt-out form.

To ensure continued communication, the Project Team implemented a suite of alternative engagement measures, including a dedicated project website, a 3D virtual consultation room, and appointment-only online Community Engagement Clinics. Between April and May 2021, 11 online clinics were held, followed by 8 in-person clinics in June–July 2021 as restrictions eased, and two further clinics in September 2021.

A Public Information Event held at the Community Development Centre, The Barracks, Ballycumber, Co. Offaly on 13th August 2024 was attended by more than 60 members of the public, providing an opportunity for direct engagement with the Project Team and specialist consultants. Throughout the pre-planning period, engagement was further supported through ongoing correspondence, meetings with residents and community groups, and continuous availability of a dedicated CLO.

The objective of the consultation was to ensure that the views and concerns of all were considered as part of the Proposed Project Design and EIA process. Appendix 2-2 of this EIAR contains a full and detailed Community Engagement Report. The report was prepared to record the consultation carried out with local community in respect of the Proposed Project.

Active engagement and consultation with the local community have taken place from an early stage during the pre-application phase of the Proposed Project. The consultation process has been an extremely valuable exercise and has provided a detailed understanding of the key issues and concerns of the local community, which has ultimately shaped the final project proposal. There is currently ongoing consultation with the local community, and it is the intention of the Applicant to continue with the consultation for the entire lifespan of the Proposed Project.

The development of the Proposed Project will provide an enduring economic benefit to the communities surrounding the Proposed Project, through the potential community benefit package for residents and community groups, employment during the construction and operation of the Proposed Project and through the annual rates payable to the Local Authority.

Please refer to the Community Engagement Report at Appendix 2-2 of the EIAR for further details.

2.10

Cumulative Impact Assessment

The EIA Directive and associated guidance documents state that as well as considering any direct, indirect, secondary, transboundary, short, medium, and long-term, permanent and temporary, positive and negative effects of the project the description of likely significant effects should include an assessment of cumulative impacts that may arise. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to a proposed development or project. The factors to be considered in relation to cumulative effects include population and human health, biodiversity, land, soil, water, air quality, climate, material assets,

landscape, cultural heritage, and major accidents / vulnerability to natural disasters, as well as the interactions between these factors.

To gather a comprehensive view of cumulative impacts on these environmental considerations and to inform the EIAR process being undertaken by the consenting authority, each relevant chapter within this EIAR includes a cumulative impact assessment where appropriate.

The potential for cumulative impacts arising from other projects has therefore been fully considered within this EIAR.

2.10.1 Methodology for the Cumulative Assessment of Projects

The potential cumulative impact of the Proposed Project and combined with the potential impact of other projects or plans has been carried out with the purpose of identifying what influence the Proposed Project will have on the surrounding environment when considered collectively with proposed and existing projects, projects pending a decision from the planning authority, projects in the public domain such as those Strategic Infrastructure Development (SID) at pre-consultation with ACP, and land-uses in the vicinity of the Proposed Project site location.

The cumulative impact assessment of projects has three principle aims:

1. *To establish the range and nature of existing and approved projects within the cumulative impact study area of the Proposed Project.*
2. *To summarise the relevant projects which have a potential to create cumulative impacts.*
3. *To identify the projects that hold the potential for cumulative interaction within the context of the Proposed Project and discard projects that will neither directly nor indirectly contribute to cumulative impacts. (Note: this is done by individual competent experts with respect to their specialist area of expertise.)*

Projects were identified through a search of relevant online planning registers and effects were considered following a review of associated EIARs.

2.10.1.1 Establishing the Cumulative Long List

To establish a long list of existing, permitted and proposed projects to be included in the cumulative impact assessment, cumulative study areas were established for each individual topic area in the EIAR. Following consultation with the EIAR team on each individual topic, the maximum geographical extent of each cumulative study area and justification for this extent was established and is presented in Table 2-6 below. Each cumulative study area was established with regard for the potential environmental receptors, potential impact pathways, topic specific guidance, best practice and professional judgement.

Table 2-6 Cumulative Study Areas

Individual Topic	Maximum Extent	Justification
Population & Human Health (including shadow flicker)	Population Study Area for (District Electoral Divisions) Shadow Flicker Study Area (10 x	The Study Area for Population is identified in Section 5.2.1 in Chapter 5 as the Electoral Divisions where the Proposed Project is located. This Study Area considers the Proposed Project, i.e. both the Proposed Wind Farm and the Proposed Grid Connection, as a whole. This Study Area for Population identified is considered for cumulative effects on Population.

Individual Topic	Maximum Extent	Justification
	RD buffer from proposed turbines).	For the assessment of cumulative shadow flicker, any other existing, permitted or proposed wind farms are considered where their ten times rotor diameter shadow flicker study area are located within the Shadow Flicker Study Area of 1.5km (ten times the rotor diameter from proposed turbines) for the Proposed Project.
Biodiversity – Flora & Fauna	10km from the Proposed Project site Wind farm developments within 25km of the Proposed Wind Farm turbines	A 10km study area from the Proposed Project site has been applied for the cumulative assessment of terrestrial ecological receptors. This extent aligns with NatureScot (2021) guidance in relation to bats (Section 4), as they are a mobile species which can cover large distances for foraging and roosting over a range of varied habitats. This extent is considered appropriate to assess potential for cumulative effects on other terrestrial ecological receptors. On a precautionary basis, existing, permitted and proposed wind farm developments within a 25km radius of the Proposed Wind Farm have also been considered. This extended search area reflects the potential for cumulative effects associated with multiple wind energy developments across the wider landscape. In addition, in relation to aquatic habitats and species, the cumulative assessment boundary for hydrological impacts has also been considered, based on Water Framework Directive (WFD) sub-catchments as detailed below under ‘Water’, and identified downstream connectivity.
Biodiversity - Bats	10km from the Proposed Project site.	Bats are a mobile species which can cover large distances for foraging and roosting over a range of varied habitats. As recommended by NatureScot 2021 (Section 4), a 10km cumulative study area is considered for potential cumulative effects on bats.
Birds	25km from the Proposed Wind Farm turbines	NatureScot (formerly SNH) guidance ‘Assessing the Cumulative Impacts of onshore Wind Energy Developments’ (SNH, 2012; 2018) was consulted while undertaking the cumulative assessment. SNH (2012; 2018) emphasises that its priority is to ‘maintain the conservation status of the species population at the national level.’ However, it is acknowledged that consideration should also be allowed for impacts at the regional level ‘where regional impacts have national implications (for example where a specific region holds the majority of the national population)’. Following the guidance of SNH (2012), the cumulative impact assessment has been carried out at the scale of the importance rating of the receptor. A 25km radius of the Proposed Wind Farm turbines was considered a reasonable approximation of the size of a county and a 25km radius of the Proposed Wind Farm turbines was considered a reasonable approximation for the local level.
Land, Soils and Geology	The Proposed Project site.	As there is no pathway for offsite cumulative impacts for Land, Soils and Geology, the cumulative study area is the ELAR Site Boundary.

Individual Topic	Maximum Extent	Justification
<p>Water</p>	<p>WFD Catchment for large infrastructural developments such as wind farms, energy and public transport developments.</p> <p>River Sub Basins for all smaller proposed, permitted or existing plans or projects (i.e. private and commercial type developments).</p>	<p>The Proposed Wind Farm is located in 3 no. WFD river sub-catchments and the cumulative hydrological study area has been delineated as follows:</p> <ul style="list-style-type: none"> ➤ The majority of Lemanaghan Bog drains to the Brosna River within the Brosna_SC_110 sub-catchment. A quantitative analysis using flow volumes derived from the EPA Hydrotool database shows that there is no potential for effects associated with the Proposed Wind Farm downstream of EPA Hydrotool Node: 25_611 on the Brosna River. This Node marks the downstream extent of the cumulative study area within this sub-catchment. This section of the cumulative study area includes several WFD river sub-basins (Brosna_100, Brosna_110, Lemanaghan Stream_010, Derrycooly Stream_010, Pollagh Stream_010, Boora_010 and Boora_020 WFD river sub-basins). Any development upstream of these sub-basins will have no potential to result in cumulative effects with the Proposed Project due to the large flow volumes in the Brosna River. ➤ A small area in the northwest of the site is located in the Shannon[Lower]_ SC_030 sub-catchment and the Blackwater (Shannonbridge)_010 WFD river sub-basin. This river sub-basin has been included in the cumulative study area. ➤ A small area in the north of the site is located in the Shannon[Lower]_SC_010 sub-catchment and the Boor_020 WFD river sub-basin. This river sub-basin has also been included in the cumulative study area.
<p>Air Quality</p>	<p>1km buffer from Proposed Project site.</p>	<p>In accordance with IAQM guidance, (<i>Assessment of Dust from Demolition and Construction</i>, IAQM 2024), the geographical boundary for dust deposition impacts may extend up to 250 m from a works area. To account for dust and other air pollutants which are released into the atmosphere, professional judgement has been applied to extend the study area to 1 km, thereby capturing potential cumulative effects of dust and air pollutants.</p>
<p>Climate</p>	<p>The climate assessment has been considered on a national basis and not confined to a specific study area.</p>	<p>The Climate assessment has considered the cumulative effects of the Proposed Project with other developments on a national basis under the relevant national Sectoral Emissions Ceilings.</p>
<p>Noise & Vibration</p>	<p>25km from Proposed Wind Farm turbines</p>	<p>The identified 25km geographical boundary is used to identify all potential wind farms or single turbines that may present a cumulative noise effect when considered with the Proposed Wind Farm. This is then refined to the area within which noise levels from the proposed,</p>

Individual Topic	Maximum Extent	Justification
		<p>consented and existing wind turbine(s) may exceed 35 dB LA90 at up to 10 m/s wind speed (Institute of Acoustics document Good Practice Guide To The Application Of Etsu-R-97 For The Assessment And Rating Of Wind Turbine Noise).</p>
<p>Cultural Heritage</p>	<p>25km buffer from the Proposed Wind Farm turbines.</p>	<p>Cumulative impacts on setting are more likely to occur at the operational stage of the development (i.e. post-construction). In this regard, in order to assess overall cumulative effects on archaeology and cultural heritage the Proposed Project is considered in the context of other developments, in particular other permitted and proposed wind farms within 25km of the Proposed Wind Farm turbines.</p> <p>Direct effects for the Proposed Project are considered to be confined to within the EIAR Site Boundary and relate to construction effects.</p>
<p>Landscape & Visual</p>	<p>25km buffer from the Proposed Wind Farm turbines for Landscape and Visual effects (LVIA Study Area).</p> <p>15km from Proposed Wind Farm for effects on landscape character (LCA Study Area).</p>	<p>The Wind Energy Development Guidelines (DoEHLG, 2006) (‘the DoEHLG 2006 Guidelines’) require that “in areas where landscapes of national or international renown are located within 25 km of a proposed wind energy development, the Zone of Theoretical Visibility should be extended as far (and in the direction of) that landscape”. The ‘Hill of Uisneach’, a protected national monument, is located approximately 23km northeast from the nearest proposed turbine T15.</p> <p>The Landscape Character Area (LCA) study area has been chosen as 15 kilometres for effects on Landscape Character Areas. Through experience conducting LVIA for other wind energy development projects, the assessment team determined that no significant effects on landscape character areas are likely to arise beyond distances of 15 km from the Proposed Wind Farm. Therefore, a LCA Study Area of 15 km is deemed appropriate for effects on landscape character in relation to the assessment of effects upon designated Landscape Character Areas.</p>
<p>Material Assets: Traffic & Transport</p>	<p>25km buffer from Proposed Wind Farm turbines</p>	<p>Informed by traffic modelling scenario and the area of influence the Proposed Project has on changing traffic volumes. The potential cumulative traffic effects with the Proposed Project are assessed on the following criteria:</p> <ul style="list-style-type: none"> • Project status (proposed to operational) • Degree of overlap with the Proposed Project delivery highway network (low to high) • Traffic volumes (low to high) <p>The geographical boundary for the traffic & transport cumulative assessment is defined by the potential for other projects to overlap with the Proposed Project delivery highway network, and so a 25km buffer from turbines is deemed appropriate to capture other plans and projects</p>

Individual Topic	Maximum Extent	Justification
		including large infrastructural developments such as wind farms, energy and public transport developments, with the potential for cumulative effects with the Proposed Project.
Material Assets: Telecoms	25km buffer from Proposed Wind Farm turbines	The geographical boundary for the telecoms cumulative assessment is defined by the potential for other wind farm projects to interfere with broadcast signals that interact with the Proposed Project.

Once the cumulative study areas were identified and justified, a search was conducted across various platforms and databases in order to compile a list of projects and ongoing activities in the area. The sources used to establish the cumulative long list are provided in Table 2-7 below. The data was first compiled spatially through a Geographic Information System (GIS). The spatialised data was then exported into a list for further scrutiny and review. This formed the cumulative long list provided in Appendix 2-3.

The maximum extent of each cumulative search buffer was determined by the largest specific cumulative study area buffer (25km from EIAR Site Boundary), as shown in Table 2-6 above. All EIAR chapters did not use the maximum extent of the largest buffer. In instances where a specific chapter's cumulative study area was smaller than the cumulative search maximum extent, the cumulative long list was filtered by distance to infrastructure/boundary, creating a chapter specific long list unique to each cumulative study area set out in Table 2-6 above.

Table 2-7: Data sources used for long list compilation

Title	Description	Author
Planning Applications	https://housinggovie.maps.arcgis.com/apps/webappviewer/index.html?id=9cf2a09799d74d8e9316a3d3a4d3a8de	Department of Housing, Local Government and Heritage
An Coimisiún Pleanála Cases	https://www.pleanala.ie/en-ie/map-search	An Coimisiún Pleanála
EIA Portal Points	https://housinggovie.maps.arcgis.com/apps/webappviewer/index.html?id=d7d5a3d48f104ecbb206e7e5f84b71f1	Department of Housing, Local Government and Heritage
Licensed Facilities	https://gis.epa.ie/EPAMaps/	EPA
Waste Schemes	https://gis.epa.ie/EPAMaps/ & MKO's internal database	EPA & MKO

To allow sufficient time for the cumulative impact assessment to be undertaken for each EIAR topic, the final search and compilation of the cumulative plans and projects list was carried out in February 2026. Therefore, plans and projects that were applied for after February of 2026 are not considered in the cumulative impact assessment.

2.10.2 Projects Considered in the Cumulative Impact Assessment

2.10.2.1 Planning Applications & Permissions

A search was conducted using data from Offaly, Westmeath, Laois, Galway, Roscommon, Tipperary and Longford County Councils and An Coimisiún Pleanála's planning portals to search for all planned and/or permitted planning applications within 25km of the Proposed Wind Farm turbines. Planning applications considered within this boundary include all live/extant permissions available on the various online portals mentioned above. This distance was chosen as it is considered that cumulative impacts would not exist with any development proposed/permitted made greater than 25km from the Proposed Project site.

Expired planning applications were excluded from the cumulative assessment as it is considered that such development has either been constructed and therefore forms part of the existing baseline or they have not been constructed and the planning permission has expired. Invalid or refused planning applications were also excluded from the cumulative impact assessment. Planning applications (including Local Authority and ACP cases) were then categorised by development description into development categories, and any relevant/large-scale developments were highlighted to the EIAR project team for inclusion in the cumulative impact assessment in each individual EIAR chapter.

2.10.2.1.1 **Substitute Consent Application for Extraction in Lemanaghan Bog (Case Ref: SU19.323676)**

As identified in Table 2-2 above, an application for substitute consent was submitted to An Coimisiún Pleanála (Case Ref: SU19.323676) on 12th September 2025, for peat extraction and ancillary works from July 1988 to the present day that have been carried out within Lemanaghan Bog. A Remedial Natura Impact Statement (rNIS) and Remedial Environmental Impact Assessment Report (rEIAR) was submitted with this application. The substitute consent application includes all areas of where historical industrial peat extraction occurred within the Proposed Project site. Described below in Section 2.10.2.3, current activities onsite include site management and environmental monitoring as required under IPC Licence P0500-01 issued by the EPA. The rEIAR and rNIS describe these activities in detail and in particular describe the activities that are intended to be carried out at Lemanaghan Bog into the future (i.e. the 'Remedial Phase'). Whilst the Draft Rehabilitation Plan detailed below in Section 2.10.2.3 is the most up to date plan, due consideration of this planning application, and in particular the findings of rEIAR and rNIS have been taken into account in describing the baseline environment and in the relevant assessments in this EIAR.

Furthermore, the cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider all potential significant cumulative effects arising from these activities.

2.10.2.1.2 **Midlands Trail Network**

The Midlands Trail Network is aiming to provide a network of connected walking and cycling trails across the Midlands in the counties of Westmeath, Offaly, Longford, Roscommon, and Tipperary. A planning application was submitted for the Offaly West section of the trail network on the 20th of January 2025 which was subsequently granted on the 12th of September 2025 (OCC Pl. Ref: 25/60014). The Midlands Trail Network extends away to the west and to the southeast of the Proposed Project site. The Midlands Trail Network is connected through the Proposed Project site. Please see drawing no. 200804-53 which shows the connection between the Proposed Project and the Midlands Trail Network.

2.10.2.2 Wind Farm Applications within 25km of the Proposed Turbines

A planning search was carried out to establish proposed, permitted and operational wind energy developments within 25km of the Proposed Wind Farm turbines. The search was carried out using the relevant local authority and ACP databases in January 2026 for relevant planning applications. In total, 17 no. applications relating to wind energy were identified within 25km of the proposed turbines, 5 no. of which relate to single turbine developments and a further 5 no. of which relate to amendments to permitted developments. These are outlined in greater detail in Table 2-3 above.

In addition to this wind energy developments at pre-application stage or within the public domain (i.e. public consultation commenced) are also considered and included in the cumulative wind farm list within 25km of Proposed Wind Farm turbines. These are summarised below:

- Bellair Wind Farm (Public Domain) - Indicative site location point is located 2.7km north of proposed turbine T10
- Leabeg Wind Farm (Existing) - 6.2km south from proposed turbine T03
- Lea Mor turbine (Permitted) - 6.8km south from proposed turbine T03
- Derrinlough Wind Farm (Existing) - 10.7km south-west from proposed turbine T03
- Cloghan Wind Farm (Existing) - 10.8km south-west from proposed turbine T03
- Meenwaun Wind Farm (Existing) - 16.4km south-west from proposed turbine T03
- Cush Wind Farm (Permitted) - 17.4km south-west from the nearest proposed turbine (T03)
- Umma More Wind Farm (Proposed) - 16.2km north from the nearest proposed turbine (T10)
- Kilbeggan Turbine (Permitted) -17km east from the nearest proposed turbine (T15)

2.10.2.3 EPA Licenced Activities

EPA licenced activities refer to industrial and waste management operations that require a license from the Environmental Protection Agency under various pieces of environmental legislation. A list of all EPA licenced activities within the cumulative study area is included in Appendix 2-3.

The categories of EPA licenced activities considered as part of the cumulative assessment are as follows:

- Industrial Emissions (IE) Licensing;
- Integrated Pollution Control (IPC) Licensing;
- Waste Licensing; and
- Waste Water Discharge Authorisations.

From May 2000, peat extraction and ancillary activities within Lemanaghan Bog and the surrounding Boora Bog group were subject to the conditions of BnM's IPC Licence (Ref. P0500-01) from the EPA. Industrial scale peat extraction was permanently ceased by BnM in Lemanaghan Bog in June 2020. From June 2020 until the end of 2024, all remaining stockpiled peat was systematically removed from the Lemanaghan Bog. BnM's statutory duties to discharge the conditions of its IPC licence from the Environmental Protection Agency for the Boora Bog Group, which encompasses Lemanaghan Bog also remain on-going.

The IPC Licence is subject to 14. No. conditions pertaining to the ongoing monitoring and maintenance to ensure any emissions from site activities will comply with and not contravene, any of the requirements of Section 83(3) of the Environmental Protection Agency Act, 1992. Conditions 1-4 of the licence outlined the Scope, Management, Interpretation and Notification procedures required by BnM, respectively. Conditions 11 to 14 detail the Monitoring (equipment use), Recording and Reporting, Emergency Response and Financial Provisions duties of BnM. Conditions 5 to 10 pertain to environmental monitoring and management.

The IPC Licence and the statutory duties to discharge its conditions, most notably the Draft Rehabilitation Plan which is described in Section 2.10.2.3 below and provided as Appendix 2-4, have also been taken account in describing the baseline environment in this EIAR.

Furthermore, the cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider all potential significant cumulative effects arising from the discharging of the IPC Licence conditions most notably the Draft Rehabilitation Plan which is described in detail below.

Irrespective of any further development on the site, BnM’s statutory duties to discharge the conditions of its IPC Licence will remain ongoing.

IPC Licence (P0500-01) - Draft Rehabilitation Plan

It is also a requirement of ‘*Condition 10 Cutaway Bog Rehabilitation*’ of the IPC Licence that following the decommissioning of use of all or part of their bogs, BnM, prepares (to the satisfaction of the EPA) and implements a Cutaway Bog Rehabilitation Plan. BnM have produced a Draft Cutaway Bog Decommissioning and Rehabilitation Plan (Draft Rehabilitation Plan) for Lemanaghan Bog, and it is the intention of BnM to rehabilitate the bog in a phased approach under IPC Licence. The Draft Rehabilitation Plan is included as Appendix 2-4.

The Draft Rehabilitation Plan included provides a description of Lemanaghan Bog and its ecology and has been taken account in describing the baseline environment in this EIAR. It also provides a framework and outline of the works that will be undertaken to achieve the aims of successful rehabilitation (the criteria for which are defined in the plan) and a timescale for when the various elements of the Draft Rehabilitation Plan will be implemented.

Irrespective any further development on the site, the measures outlined in the Draft Rehabilitation Plan (Appendix 2-4) will be implemented by BnM in agreement with the EPA, per BnM’s IPC Licence Obligations.

Table 2-8 outlines a high-level overview of the actions proposed and Table 2-9 gives a programme overview of when these works will be undertaken.

Table 2-8: Types of and areas for rehabilitation measures at Lemanaghan Bog

Type	Code	Description	Area (Ha)
Deep peat cutover bog	DPT1	Regular drain blocking (3/100 m) + modifying outfalls and managing water levels with overflow pipes	365
Dry cutaway	DCT1	Modifying outfalls and managing water levels with overflow pipes	252
Wetland cutaway	WLT1	Modifying outfalls and managing water levels with overflow pipes	104
Marginal land	MLT1	No work required	102
Constrained area	Constraint	Constraint – windfarm infrastructure & active turbarry	291
Total Area			1114

*Note that the types of rehabilitation and areas of rehabilitation may change in response to stakeholder consultation and refinement of the rehabilitation measures.

Table 2-9 Lemanaghan Bog Rehabilitation Programme. Please see Appendix 2-4 for more details.

Completed & Ongoing	Short-term planning actions 0-1 years	Short-term practical actions (0-2 years)	Long-term (>3 years)
<p>The majority of the site is still bare peat. Bare peat areas within the older cutaway areas are reducing due to natural re-colonisation of the cutaway.</p> <p>A small part of the site has already re-vegetated, with pioneer vegetation developing a mosaic of typical cutaway peatland habitats including scrub and Birch woodland</p>	<ul style="list-style-type: none"> > Seek formal approval of the rehabilitation plan from the EPA. > Develop a detailed site plan outlining how the various rehabilitation methods will be applied to Lemanaghan Bog. This will take account of peat depths, topography, drainage and hydrological modelling (see rehabilitation map for an indicative view of the application of different rehabilitation methodologies). > A drainage management assessment of the proposed rehabilitation measures will be carried out and any issues identified resolved and the rehabilitation plan adapted. > A review of known archaeology and an archaeological impact appraisal of the proposed rehabilitation will be carried out. The results of this assessment will be incorporated into the rehabilitation plan to minimise known archaeological disturbance, where possible. > A review of issues that may constrain rehabilitation such as known rights of way, turbary and existing land agreements is to be carried out. > A review of remaining milled peat stocks is to be carried out. > An ecological appraisal of the potential impacts of the planned rehabilitation on the presence of sensitive ground-nesting bird breeding species (e.g. breeding waders) is to be carried out. The scheduling of rehabilitation operations will be adapted, where required. > Ensure all activities comply with the environmental protection requirements of the IPC Licence. > Carry out Appropriate Assessment (AA) of the Rehabilitation Plan. Incorporate any required mitigation measures from the AA in the plan for the delivery of rehabilitation and decommissioning across the site. > Track implementation and enforcement of the relevant IPC Licence conditions, the mitigation measures (AA) and other environmental control measures during the implantation of the rehabilitation plan 	<ul style="list-style-type: none"> > Carry out proposed measures as per the detailed site plan. All rehabilitation will be carried out with regard to best practice environmental control measures (Appendix III to Appendix 4-2). > Monitor the success of rehabilitation measures in relation to developing suitable hydrological conditions. > Carry out the proposed monitoring, as outlined in Section 9 in Appendix 4-2. > Silt ponds will be monitored during this period and there will be continued maintenance and cleaning to prevent potential suspended solids run-off from the site during the rehabilitation phase. 	<ul style="list-style-type: none"> > Evaluate success of short-term rehabilitation measures outlined above and remediate where necessary. > Delivery of a monitoring, aftercare and maintenance programme (See section 10.2 in Appendix 4-2). > Decommissioning of silt-ponds will be assessed and carried out, where required. > Reporting to the EPA will continue until the IPC License is surrendered.

2.10.2.4 Peatland Climate Action Scheme

In 2023 the Peatland Climate Action Scheme (PCAS) selected Ballaghurt and Glebe Bogs located approximately 4.4km west of the Proposed Wind Farm at its closest point (i.e., T01), Clynan Bog located approximately 25.5km north of the Proposed Grid Connection, and Killeglan Bog located approximately 28.1km northwest of the Proposed Grid Connection for PCAS. In 2024, PCAS has selected Curragalassa Bog and Derrynagun bog which are adjacent to the Proposed Project site. These two areas are on the southern side of the R436 road which connects Fermbane, Co. Offaly to Ballycumber, Co. Offaly. The two sections include an area of drained high bog, Curragalassa Bog, located 65m south of the site and a larger section of cutaway bog, Derrynagun Bog, located 105m south of the site. Please note, the Curragalassa Bog and Derrynagun Bog are not hydrologically connected to the Proposed Project site and are located outside the extent used for the purposes of assessment contained in this EIAR.

This form of enhanced peatland rehabilitation, which is above and beyond what is required under IPC license, has also been successfully implemented at the recently constructed Clonreen Wind Farm. To date, approximately 20,955ha of peatland has been rehabilitated under the PCAS²⁶. PCAS is supported by Government through the Climate Action Fund and Ireland's National Recovery and Resilience Plan administered by the Department of Environment, Climate and Communications (DECC). Please see <https://www.bnmpcas.ie/> for details. The NPWS acts as the Scheme regulator and there is ongoing engagement with the EPA. This scheme is separate to the IPC licence requirements and does not form part of the Proposed Project application.

The PCAS activities underway at Ballaghurt and Glebe Bogs, and Curragalassa Bog and Derrynagun bog have also been taken account in describing the baseline environment in the vicinity of the Proposed Project and in the relevant assessments. Furthermore, the cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider all potential significant cumulative effects arising from these activities in the vicinity of the Proposed Project.

2.10.2.5 Arterial Drainage Schemes

The Office of Public Works (OPW) carried out several Arterial Drainage Schemes on catchments under the Arterial Drainage Act, 1945. Under section 37 of the 1945 Act, the OPW is required to maintain drainage works in proper repair and effective condition. These drainage works include watercourses, embankments and other structures.

Watercourses are subject to siltation and erosion, among other processes, while embankments are subject to settlement and erosion. The Brosna Arterial Drainage Scheme is located within the cumulative study area. The Brosna Arterial Drainage Scheme is particularly relevant to the Proposed Project site as the benefitting lands to the scheme are located within Lemanaghan Bog. All other Arterial Drainage schemes within the cumulative study area are included in Appendix 2-3.

2.10.3 Cumulative Impact Assessment Summary

The cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider all potential significant cumulative effects arising from relevant projects and land uses within the cumulative study area as detailed above. These include ongoing agricultural and third party / private peat extraction practices.

Overall, the Proposed Project has been designed to avoid and mitigate impacts on the environment and a suite of mitigation measures is set out within the EIAR. A detailed cumulative impact assessment for

²⁶ <https://www.bnmpcas.ie/news-and-updates/>

each discipline within the EIAR is provided in each impact assessment chapter detailing the potential significant cumulative effects arising and, where appropriate, the specific suite of relevant mitigation measures proposed. The mitigation measures set out in this EIAR will ensure that significant cumulative effects do not arise during the construction, operational or decommissioning phases of the Proposed Project.