Planning and Environmental Consultants

Planning Report

Lemanaghan Wind Farm, Co. Offaly

DOCUMENT DETAILS

Client:	**Lemanaghan Wind Farm DAC**
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1. EXECUTIVE SUMMARY

The Proposed Lemanaghan Wind Farm Development consists of 15 no. wind turbines, an onsite 220kV substation and loop-in grid connection, and associated infrastructure and works in Co. Offaly. The Proposed Lemanaghan Wind Farm Development will have an installed capacity of approximately 90MW. The proposed wind turbines will connect to the national electricity grid via a proposed onsite 220kV substation connecting to the existing Shannonbridge-Maynooth 220kV Overhead Line (OHL). The 15 no. wind turbines will have a blade tip height of 220 metres; a rotor diameter of 150 metres; and hub height of 145 metres. The area of the Proposed Lemanaghan Wind Farm Development application, delineated by the red line planning application boundary, is 1,111 hectares. The application site was formerly subject to commercial peat extraction, which ceased in June 2020. The Lemanaghan Wind Farm will be henceforth referred to using the following terminology, as defined in below in **Section 2.1**: the 'Proposed Project', the 'Proposed Wind Farm', the 'Proposed Grid Connection', the 'Proposed Project site', and the 'site'. This application for the Proposed Project comprises Strategic Infrastructure Development and therefore, this planning application is being made under the provisions of Section 37E of the Planning and Development Act 2000, as amended, directly to An Coimisiún Pleanála. This Planning Report has been prepared in support of the planning application for the Proposed Project which is accompanied by an Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS).

The introductory sections of this Planning Report provide an overview of the Proposed Project, the Applicant, the site location and context, the site's planning history and a summary of consultation undertaken. The design process is outlined, demonstrating the rationale for the site's selection and its suitability for wind energy development. The iterative design process outlines the design stages from the initial design to the final design iteration. Each design iteration responded to the specific constraints on the site, as they were identified by site surveys and detailed analysis.

The Proposed Project is strongly supported by European and national policy and legislation on renewable energy. At a European level, the Proposed Project is supported by the European Union Renewable Energy Directive and REPowerEU. At a national level, the Proposed Project is supported by the National Planning Framework First Revision, Climate Action Plan 2025, the National Energy Security Framework, among other national climate and renewable energy policies. The legally binding greenhouse gas emission reduction target and the obligations of public bodies under the Climate Action and Low Carbon Development Act 2015, as amended, should also be considered in the assessment of this application. At a local level, the Proposed Project is supported by climate and renewable energy policies as set out in the Offaly County Development Plan 2021-2027. A full appraisal of the relevant policy and legislation is provided in **Section 6** and **Section 7** of this Planning Report.

The development of viable sites for wind energy development is essential to meet European, national, regional and local climate and renewable energy targets. Ireland needs to scale up onshore wind energy development at an unprecedented rate to achieve its 9GW and 80% renewable energy share targets, as set out in the Climate Action Plan 2025. The reality of achieving these targets is the installation of over 800 Megawatts (MW) of wind energy per year until 2030. If permitted, the Proposed Project will generate and provide approximately 90 MW of clean and sustainable renewable wind energy to Ireland's national electricity grid and national renewable energy capacity. This will not only contribute to the decarbonisation of the electricity sector but will play a role in the decarbonisation of other sectors and the transition to a sustainable and climate-resilient economy and society.

To conclude, it is submitted that, based on the evidence provided in this Planning Report, the Proposed Project is strongly supported by European, national, regional and local planning policy and will contribute to the achievement of national and local climate and renewable energy targets. The Proposed Project will also support Ireland's energy security by generating and increasing indigenous renewable wind energy, which will reduce Ireland's reliance on imported fossil fuels for energy generation. Ultimately, it is submitted that the Proposed Project is in accordance with principles of proper planning and sustainable development.

2. INTRODUCTION

This Planning Report has been prepared by MKO on behalf of Lemanaghan Wind Farm Designated Activity Company ('DAC') ('the Applicant'), to accompany a Strategic Development Infrastructure ('SID') planning application to An Coimisiún Pleanála ('ACP' or 'the Commission') under Section 37E of the Planning and Development Act 2000, as amended ('the Planning Act'). The SID planning application comprises a renewable energy development of 15 no. wind turbines, an onsite 220kV substation and loop-in grid connection, and associated infrastructure and works. The Proposed Project site is located in Lemanaghan and adjacent townlands, between Ferbane and Ballycumber in Co. Offaly.

The Proposed Project falls within the definition of a 'renewable energy development' and is therefore covered by the provisions of the Renewable Energy Directive III (Directive 2023/2413). The planning application is subject to a completeness check under section 37JA of the Planning Act by the European Union (Planning and Development) (Renewable Energy) Regulations 2025.

2.1 Report Definitions, Structure and Contents

For the purposes of this Report and as set out in **Chapter 1** of the Environmental Impact Assessment Report (EIAR), the Proposed Project will be referenced as follows:

- Where the '**Proposed Project**' is referred to this encompasses the entirety of the project for the purposes of the Environmental Impact Assessment (EIA) in accordance with the EIA Directive. The Proposed Project is described in detail in **Chapter 4** of the EIAR.
- Where the '**Proposed Wind Farm**' is referred to, this refers to turbines and associated foundations and hard-standing areas, meteorological mast, internal roads, amenity track, temporary construction compounds, underground cabling, peat and spoil management, borrow pits, site drainage, biodiversity mitigation and enhancement, turbine delivery route and associated junction accommodation works, and all ancillary works and apparatus. The Proposed Wind Farm is described in detail in **Chapter 4** of the EIAR.
- Where the 'Proposed Grid Connection' is referred to, this refers to the onsite 220kV substation, wind farm control building, 2 no. gantry structures, 2 no. crane pads, 2 no. tower pads, 4 no. steel masts, telecommunications tower, temporary access track, and OHL connecting to the existing Shannonbridge-Maynooth 220kV OHL, and all ancillary works and apparatus. The Proposed Grid Connection is described in detail in **Chapter 4** of the EIAR.
- Where the 'Proposed Project site' or 'site' is referred to, this relates to the primary study area for the EIAR, as delineated by the EIAR Site Boundary in green as shown on **Figure 3-2** of this Report and encompasses an area of approximately 1,258 hectares.

This Planning Report is structured as follows:

- **Introduction --** Introduction to the Applicant, the Proposed Project, the application documents and the summary of the report findings.
- **Project Background** – Outlines the strategic need for the Proposed Project, the site and its current land use and planning history.
- **Consultation** – EIAR scoping, pre-application and community consultations details, RED III checklist.
- **Proposed Project** – Description of the main elements of the Proposed Project subject to this Section 37E planning application along with the design process from site selection through to the final design.
- **Legislative Context**: Requirements under the Planning Act, along with an overview of the legislative framework for renewable energy and climate action.
- **Planning Policy Context** – Review and evaluation of the Proposed Project against European, national, regional, and local policy.
- **Planning Assessment** – Evaluation of the Proposed Project against the relevant policy and legislative requirements.

3. PROPOSED PROJECT BACKGROUND

3.1 The Applicant

The Applicant for the Proposed Project is Lemanaghan Wind Farm DAC. The Proposed Project is a Joint Venture (JV) between Bord na Móna (BnM) and SSE Renewables. The JV was established in March 2024, at which time the Lemanaghan Wind Farm DAC replaced BnM as the Applicant.

SSE Renewables

SSE Renewables is a leading developer and operator of renewable energy generation, focusing on onshore and offshore wind farms, hydro-electric power and flexible storage technologies. It is part of electricity infrastructure company SSE plc, a FTSE-100 company with operations across the UK and Ireland, and a presence in carefully selected international markets. SSE Renewables delivers clean power assets to increase SSE's operational renewable generation capacity as part of the company's five-year investment plan to 2030. This includes delivery of the world's largest offshore wind farm in construction, the 3.6GW Dogger Bank Wind Farm. SSE Renewables operates some of the leading onshore wind farms in Ireland including the 174MW Galway Wind Park in Connemara and the 73MW Slieve Kirk Wind Park outside Derry City.

Bord na Móna

BnM is a publicly owned company, originally established in 1946 to develop and manage some of Ireland's extensive peat resources on an industrial scale, in accordance with government policy at the time. BnM's lands extend to approximately 80,000 hectares in total and are located mainly in the Irish midlands. BnM currently manages and operates a portfolio of thermal and renewable assets, namely Edenderry Power Plant, a peat/biomass co-fired electricity generating unit, Cushaling peaking plant, Cloncreen, Bellacorick, Mountlucas, Bruckana and Oweninny wind farms, Derrinlough wind farm (under construction), Timahoe North solar farm and the Drehid landfill gas facility.

In 2015, BnM published its 'Sustainability Statement 2030', which sets out the company's commitment to transition to peat-free electricity generation by 2030. Renewable energy generation, including solar power, biomass and wind power, is a key component of this transition. In October 2018, BnM announced its strategy to decarbonise, accelerating moves away from its traditional peat business into renewables, resource recovery and new sustainable businesses. BnM's target is for an 80% reduction in carbon emissions by 2030 based on 2015 levels and to accelerate the development of renewable energy by providing up to 2GW of renewable energy generating assets by 2030 in support of national climate and energy policy targets.

BnM has a long track record of developing energy projects, dating back to the development of the first generation of peat-fired power stations. In recent times, the business has gone through radical change, announcing the new "Brown to Green" strategy, committing to the cessation of peat harvesting, and focusing on developing climate solutions in renewable energy, sustainable waste management, carbon storage and biodiversity conservation. A key objective of this strategy involves using the land to continue to underpin Ireland's energy independence by developing green, sustainable energy sources to assist with Ireland's commitment to achieve 80% renewable electricity by 2030.

3.2 Site Location and Context

The Proposed Wind Farm is located approximately 3 kilometres (km) northeast of Ferbane and approximately 2.5km southwest of the village of Ballycumber in Co. Offaly. The approximate centre of the site is X616027, Y728163 in Irish Transverse Mercator (ITM) coordinates. The Proposed Project site includes lands in the townlands of Cooldorragh, Kilnagarnagh, Cappanalosset, Tumbeagh, Killaghintober, Castlearmstrong, Leabeg, Cornafurrish and Corrabeg, Lemanaghan, Kilnagoolny, Straduff, Lisdermot, Derrica More, Rosfaraghan, Rashinagh, Cor Mor and Cor Beg, Corbane, and

Ballindown Co. Offaly. The area of the site delineated by the red line planning application boundary is 1,111 hectares.

The landcover within the site is a mixture of bare cutaway peat, re-vegetated bare peat, degraded raised bog, scrub, low woodland and remnants of high bog. Current land use within the Proposed Wind Farm comprises natural recolonisation of cutaway and degraded bog and a small area of active turbary along with remnants of high bog. Approximately 17km of BnM permanent fixed-gauge rail lines can be found running through Lemanaghan Bog. Current land use along the Proposed Grid Connection comprises degraded raised bog and agricultural land. Land-use in the wider landscape of the site comprises of BnM landholdings, forestry, agricultural land, cutover and cutaway peatland, one-off rural housing and small village settlements.

The Proposed Wind Farm turbines are located within an area designated in the Offaly County Development Plan 2021-2027 (OCDP) as 'Open for Consideration' with the exception of T05 which is located on the boundary of an area designated 'not Deemed Suitable for Wind Energy Developments', this is discussed further in **Section 7.2.1** below.

A Site Location Context map, a EIAR Site Boundary map and a Planning Application Boundary Map are shown in **Figure 3-1, Figure 3-2 and Figure 3-3 respectively** below.

3.3 Planning History

A planning search was carried out through Offaly County Council's ('OCC') online planning portal along with ACP's online case search function in February 2026 for relevant planning applications within the planning application boundary of the Proposed Project. The relevant planning applications are outlined in **Section 2.7.1** of **Chapter 2** of the EIAR. In total, 4 no. applications were identified within the planning application boundary of the Proposed Project, 2 no. relate to wind monitoring masts and 2 no. relate to substitute consent for peat extraction and ancillary works which are discussed in further detail in **Section 3.3.1** below.

A planning search was also 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 February 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** of **Chapter 2** of the EIAR.

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

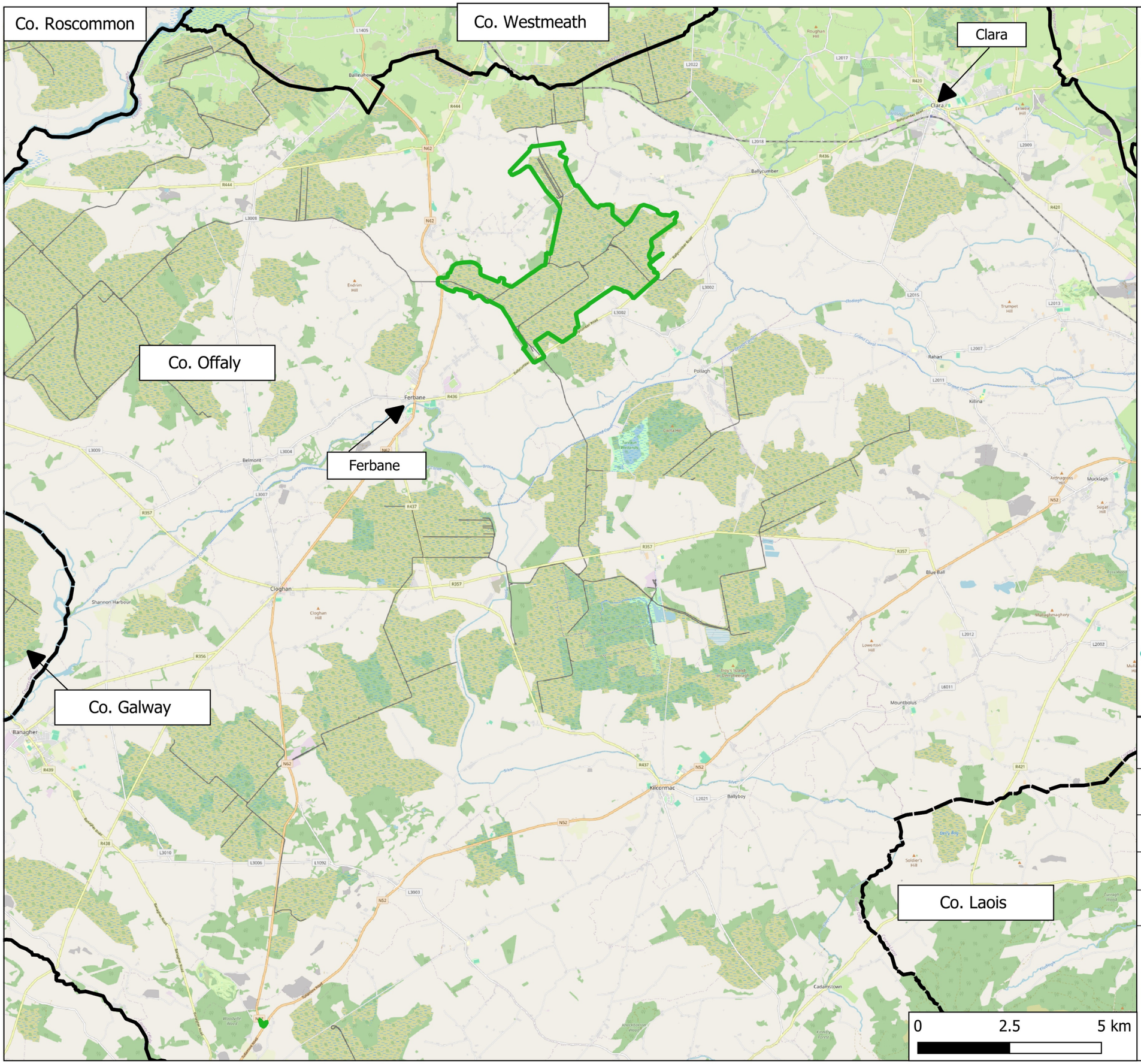
- Bellair Wind Farm (Public Domain) - Indicative site location point is located 2.7km north of the nearest proposed turbine, i.e., T10;
- Leabeg Wind Farm (Existing) - 6.2km south from the nearest proposed turbine, i.e., T03;
- Lea Mor turbine (Permitted) - 6.8km south from the nearest proposed turbine,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

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

An application for substitute consent was submitted by BnM to ACP (Case Ref: SU19.323676) on 12th September 2025 for peat extraction and ancillary works from July 1988 that have been carried out within Lemanaghan Bog. A Remedial Natura Impact Statement (rNIS) and Remedial Environmental Impact Assessment Report (rEIAR) were submitted as part of the substitute consent application. The substitute consent application includes all areas of where historical commercial peat extraction occurred within Lemanaghan Bog, within which the majority of the Proposed Project site is located. 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').

Current activities onsite include site management and environmental monitoring as required under Integrated Pollution Control (IPC) Licence P0500-01[1] from the Environmental Protection Agency (EPA). Commercial peat extraction at the Lemanaghan Bog under IPC Licence No. 500-01 ceased in June 2020. Under Condition 10 (decommission and rehabilitation) of the IPC licence, BnM have produced a Draft Cutaway Bog Decommissioning and Rehabilitation Plan (Draft Rehabilitation Plan) for Lemanaghan Bog. Whilst the Draft Rehabilitation Plan detailed in **Section 2.10.2.2** of **Chapter 2**, and provided as **Appendix 2-4** to the EIAR is the most recent plan, due consideration of the substitute consent 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 the EIAR accompanying this application. It is highlighted that irrespective of the consenting or construction of the Proposed Project, the measures outlined in the Draft Rehabilitation Plan will be implemented by BnM in agreement with the EPA, per the BnM's IPC Licence Obligations. Please see **Appendix 2-4** of **Chapter 2** of the EIAR for the Draft Rehabilitation Plans for Lemanaghan Bog.

[1] *Integrated Pollution Control License PO-500-01 issued by the EPA for the Boora Bog Group. Available at: https://epawebapp.epa.ie/terminalfour/ippc/ippc-view.jsp?regno=P0500-01*



Map Legend

- EIAR Site Boundary
- County Boundaries

Drawing Title

Site Location Context

Project Title

Lemanaghan Wind Farm, Co. Offaly

Drawn By	Checked By
CJ	EC
Project No. 200804	Drawing No. Figure 3-1
Scale 1:100,000	Date 2026-02-25

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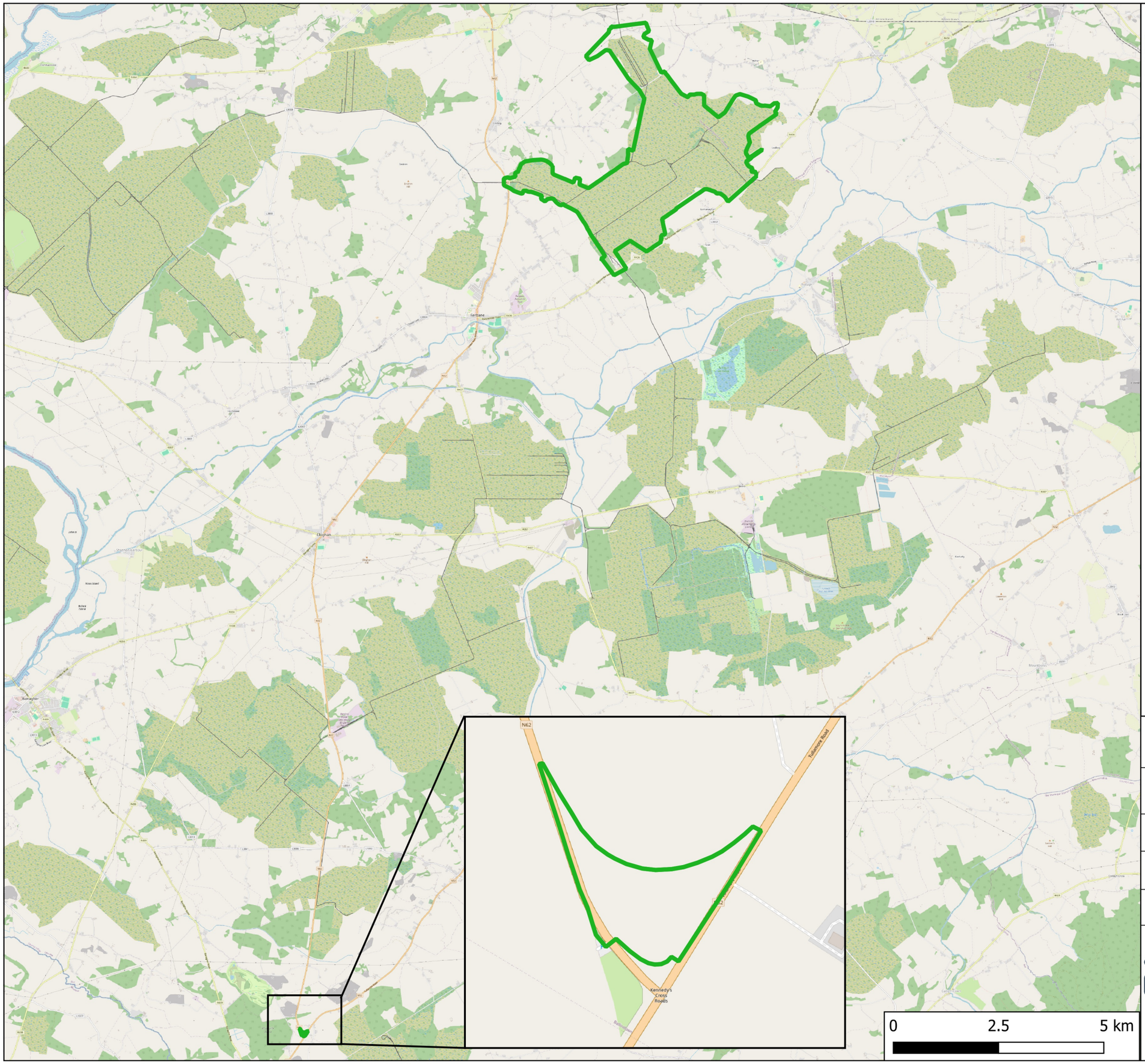

Map Legend

EIAR Site Boundary

County Boundaries

Drawing Title

EIAR Site Boundary

Project Title

Lemanaghan Wind Farm, Co. Offaly

Drawn By	Checked By
CJ	EC
Project No. 200804	Drawing No. Figure 3-2
Scale 1:87,500	Date 2026-01-26

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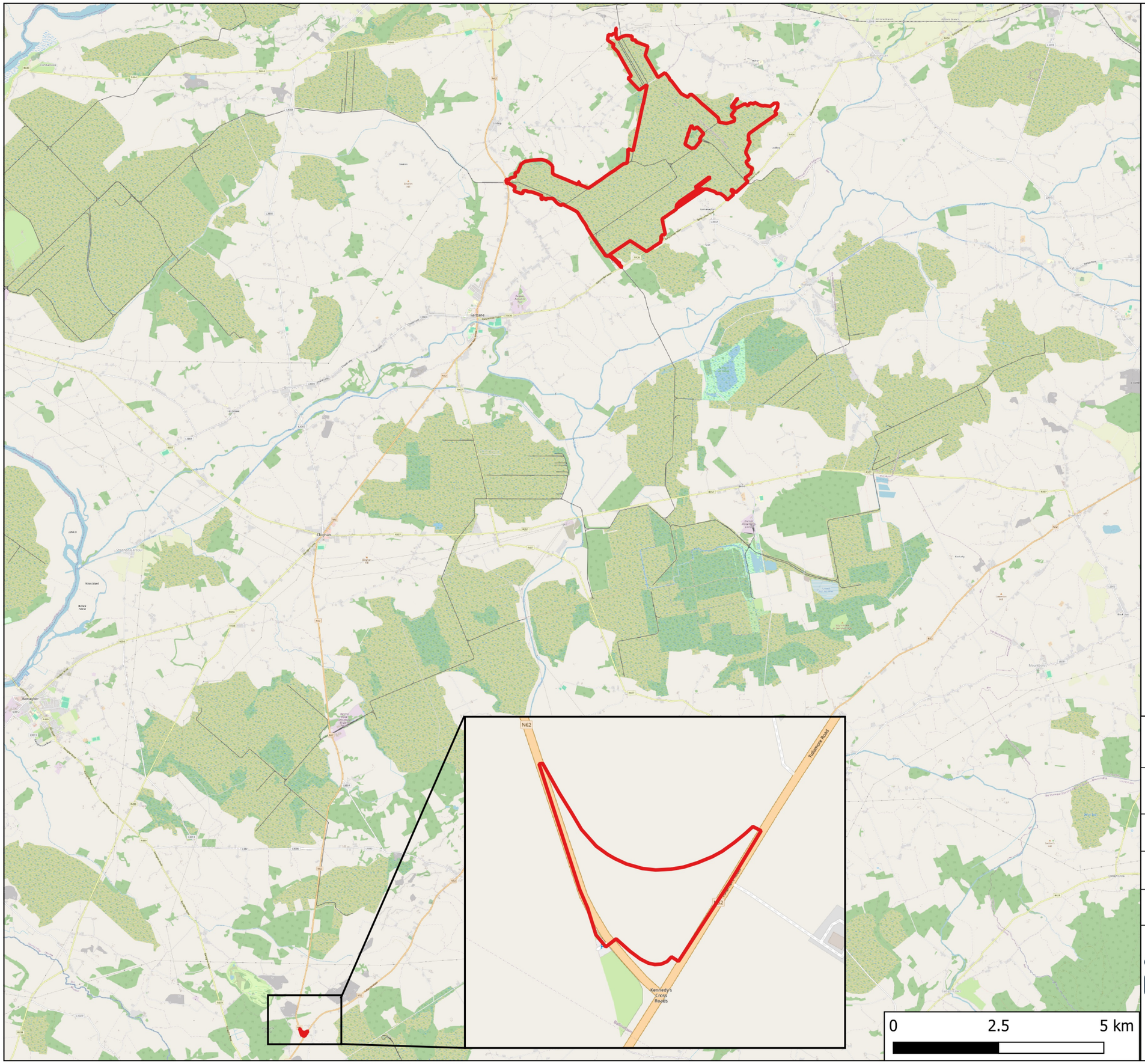

Map Legend

Planning Application Boundary

County Boundaries

Drawing Title
Planning Application Boundary

Project Title
Lemanaghan Wind Farm, Co. Offaly

Drawn By	Checked By
CJ	EC
Project No. 200804	Drawing No. Figure 3-3
Scale 1:87,500	Date 2026-01-26

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4. CONSULTATION

This section of the Planning Report outlines the pre-application consultation undertaken by the Applicant for the Proposed Project. This includes Scoping as part of the EIAR, pre-application meetings with Offaly County Council (OCC) and ACP, and consultation with the local community.

4.1 EIAR Scoping

An EIA scoping report, providing details of the Proposed Project, was prepared by MKO and circulated in May 2021 and March 2025. MKO requested the comments of the relevant personnel/bodies in their respective capacities as consultees with regards to the EIAR process. As part of the constraints mapping process, telecommunications operators were contacted in November 2020 (and again in October 2024 and March 2025) in order to determine the presence of telecommunications links either transversing the site or in close proximity to the Proposed Wind Farm site.

The scoping document provided details of the Proposed Project and set out the scope of work for the EIAR. Consultees (as listed in **Table 2-4** of **Chapter 2** of the EIAR) 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 the previous scoping exercise 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.

Copies of all scoping responses received are included in **Appendix 2-1** of the EIAR. The recommendations of the consultees have informed the scope of the assessments undertaken and the contents of the EIAR.

4.2 Pre-Application Meetings

4.2.1 Offaly County Council

Two pre-application meetings were held with attendees from various departments of Offaly County Council.

The pre-application consultation meetings are summarised in **Table 4-1** below. Further detail is provided in relation to each meeting in **Section 2.8.3.1.1** in **Chapter 2** of the EIAR.

Table 4-1: Offaly County Council Pre-Application Consultation Summary

Meeting Details	Matters Discussed
30th of June 2021 Online via MS Teams	› The prospective applicant and project background and design. › Planning policy including compliance with local wind energy policy. › The Landscape and Visual Impact Assessment and Ecology. › Photomontage viewpoint locations › Archaeological heritage › Recreation and amenity › Community benefit › Turbine delivery and haul routes › Scoping and pre-application/public consultation undertaken to date. › The scope of the Environmental Impact Assessment Report to be undertaken. › Projected Project timelines.
12th June 2025	› Updated Project Layout overview and site constraints › Wind energy policy and zoning

Online via MS Teams	› Amenity infrastructure and connections › Landscape and visual impact assessment including photomontage viewpoint locations › Site entrances › Public consultation response › Peatland rehabilitation › Car park provisions post construction › Wind Farm signage › EIAR structure › Haul routes, road conditions and reinstatement › Archaeological assessment › Consultations to date and public consultation response › Project timeline update

4.2.2 An Coimisiún Pleanála

Three pre-application consultation meetings were held under Section 37B of the Planning Act with ACP (Pre-planning ref: 310844-21). Feedback and recommendations from ACP regarding the environmental impact assessment and the preparation of the application were considered and incorporated into the application documents where appropriate. The pre-application consultation was closed by ACP in accordance with Section 37B(4)(a) of the Planning Act in a letter dated 3rd March 2026. This confirmed that the Proposed Project constitutes SID and therefore the planning application should be made directly to ACP under Section 37E of the Planning Act.

The pre-application consultation meetings are summarised in **Table 4-2** below. Further detail is provided in relation to each meeting in **Section 2.8.3.1.2** in **Chapter 2** of the EIAR.

Table 4-2: An Coimisiún Pleanála Pre-application Consultation Summary

Meeting Details	Matters Discussed
23rd of September 2021 Online via MS Teams	› Planning policy including compliance with local wind energy policy. Specific details of the project relating to LVIA, Ecology and Aviation. › The scope of the Environmental Impact Assessment Report. › Scoping & pre-application/public consultation undertaken to date. › Surveys carried out to date. › Turbine foundations and the impact on hydrology. › EPA licencing and rehabilitation plans. › Risk of peat slippage. › Landownership. › Projected project timelines. › Strategic Infrastructure Development criteria as set out in the 7th Schedule of the Planning Act.
23rd January 2025 Online via MS Teams	An update on the Proposed Project. › Designated sites surrounding the site. › The design process and the constraints assessments carried out to date. › The turbine delivery route. › The grid connection design. › Ornithology and the results of surveys to date. › The planning policy context. › The scope of the Environmental Impact Assessment Report. Consultation to date and the Proposed Project timeline. › Strategic Infrastructure Development criteria as set out in the 7th Schedule of the Planning Act.
10th December 2025 Online via MS Teams	› Proposed Project Update › Planning and EPA Status, substitute consent application and IPC licence › Policy context and wind energy designations › 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 & Residential amenity ○ Landscape & Visual Impact ○ Cultural Heritage ○ Other Material Assets ○ Cumulative Impacts ○ Grid Connection and TDR ○ Biodiversity Enhancement › Presentation of the panning application, EIAR and NIS.

4.3 Community Consultation

The Community Liaison 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. This feedback and information has been used to inform the design process.

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 consultation 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 company brochure, which provided an overview of BNM and some general information about wind energy;
- A site location map;
- An overview map which divided the properties surrounding the site;
- A map highlighting the potential developable area which was under review at that time;
- 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.

Following the initial notification of the proposal to the local community, the CLO liaised with interested parties in helping them to understand the proposal and respond to any queries or concerns raised. As more project information became available, further consultations were organised, with the CLO attending in-person meetings with individuals to answer queries relating to the Proposed Project.

In April 2021, due to Covid-19 restrictions, virtual clinics were held with members of the community. In September/October 2021, weekly appointments were held (on alternate weeks in Ballycumber and Ferbane) for persons who requested a face-to-face meeting. More recently, in August 2024, a public information event was held in Ballycumber Community Centre. 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 the 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 has 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, if permitted, provide an enduring economic benefit to the communities surrounding the Proposed Project, 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. Both BnM and SSE have a long history of delivering local community funds, and have supported a number of strategic initiatives, including scholarships and major projects. The value of the Community Benefit Fund will be linked to the productivity of the wind farm and is calculated based on €2/MWh of the overall total generated by the wind farm. It is estimated that the proposed Fund could be in the region of circa €8 million over the first 15 years of the operation of the Proposed Wind Farm, on the basis of an annual generation of 275,940 MWh.

In 2021, The Department of the Environment, Climate and Communications, published the Renewable Energy Support Scheme Good Practice Principle Handbook, outlining how community funds should be managed, operated, and distributed to wind and solar projects that are successful in the Renewable Energy Support Scheme (RESS) Auctions. This was further updated to a revised rulebook in May 2025 (*which may be subject to change at the Department's discretion*).

A key criterion of the Department's Community Benefit Rulebook, as updated in 2025, is that the projects and initiatives will benefit the communities surrounding the wind farm. As part of this, a Fund Committee will be established and will consist of a number of volunteer community representatives, the Project Developer and Administrator (if applicable). The Fund Committee should aim to represent the widest cross-section of the community possible. The Fund Committee will then develop a strategy for the Community Fund.

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

5. PROPOSED PROJECT

5.1 Proposed Project Description

This section describes the Proposed Project. The development description for the current planning application as appears in the public notices is as follows:

The proposed development will comprise:

(i) *15 no. wind turbines with the following dimensions:*
- *A total tip height of 220m;*
- *Rotor diameter of 150m;*
- *Hub height of 145m.*

(ii) *Permanent turbine foundations, hard-standing and assembly areas;*

(iii) *Underground electrical and communications cabling connecting the 15 no. wind turbines to the proposed 220kV onsite electrical substation;*

(iv) *A new permanent 220kV electrical substation compound (c. 9611m²) in the townland of Cooldorragh consisting of 1 no. Gas Insulated Substation (GIS) building, 1 no. Independent Power Producer (IPP) control building, 2 no. gantry structures, all associated electrical and communications plant and equipment, welfare facilities, 2 no. foul water holding tank, 2 no. bored wells, access roads, security fencing and gates, lightning masts, signage, landscaping, drainage infrastructure and all other ancillary works;*

(v) *A permanent telecommunications tower with a height of 36m and associated foundation and hard-standing area;*

(vi) *The permanent installation of c. 800m of 220kV overhead line, 4 no. new steel masts, temporary tower build areas, temporary tower crane pads and associated hard-standing areas to facilitate the new 'loop-in/loop-out' connection into the existing 220kV Shannonbridge to Maynooth line;*

(vii) *The new permanent overhead line grid connection will require the decommissioning / removal of 1 no. existing steel mast and c. 75m of existing 220 kV line;*

(viii) *A meteorological mast with a height of 145 metres and associated foundation and hard-standing area;*

(ix) *The permanent upgrade of c.1.14km of existing internal site roads/tracks and the provision of c.17.1 km of new permanent internal site access roads, passing bays and a layby area;*

(x) *The permanent upgrade of c.1.8km of existing tracks and the provision of c.3.9km of new permanent tracks for the purposes of amenity, seating areas, and amenity signage;*

(xi) *The provision of temporary access track off the L7001 local road during the construction phase;*

(xii) *Removal of an existing agricultural shed to accommodate the new temporary access track off the L7001 local road;*

(xiii) *2 no. new gated site entrances off the L7002 local road;*

(xiv) *Upgrade of 3 no. existing site entrances off the N62 national road, R436 regional road and L7001 local road;*

(xv) *A temporary access track from the N52 national road to the N62 national road at Kennedy's Cross in the townland of Ballindown to facilitate the delivery of turbine components and other abnormal loads;*

(xvi) *5 no. temporary construction compounds with temporary offices, containers and staff facilities;*

(xvii) *3 no. permanent amenity car parks each including 15 no. spaces for private vehicles, 3 no. spaces for accessible parking, parking for buses and bicycle rack facilities;*

(xviii) *4 no. temporary borrow pits;*

(xix) *5 no. temporary security cabins;*

(xx) *2 no. clear span watercourse crossings;*

(xxi) *Peat and Spoil Management;*

(xxii) *Site Drainage;*

(xxiii) *Removal of c.1.02ha of immature woodland and c.0.64 hectares of scrub;*

(xxiv) *Biodiversity management and enhancement measures;*

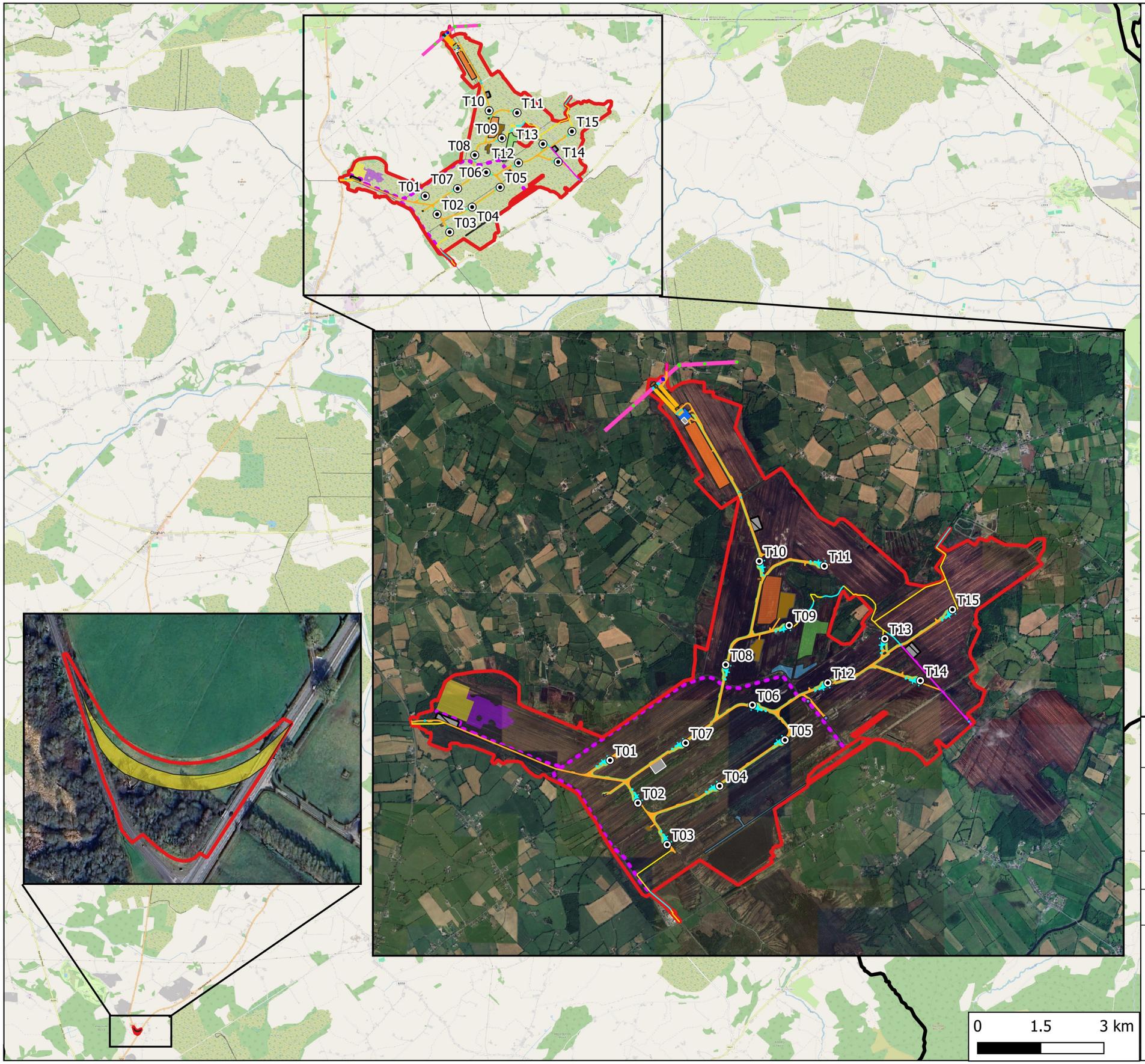
(xxv) *Operational stage site signage; and*

(xxvi) *All ancillary apparatus and site development works above and below ground, including hard and soft landscaping and drainage infrastructure.*

A 10-year planning permission and a 35-year operational life of the wind farm from the date of full commissioning is sought.

An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) have been prepared and accompany this planning application.

The Proposed Wind Farm will have a generating capacity of approximately 90MW. A full description of the Proposed Project is provided in **Chapter 4** of the EIAR. The Proposed Wind Farm and Proposed Grid Connection layouts are illustrated in **Figure 5-1** and **Figure 5-2** respectively.



Map Legend

- Planning Application Boundary
- Proposed Turbine Layout
- Proposed Turbine Foundations
- Proposed Hardstands
- Proposed New Roads
- Proposed Temporary Access Track
- Proposed Upgrades to Existing Roads
- Proposed New Amenity Track
- Proposed Upgrades to Existing Roads for Amenity Track
- Proposed Lay By for Delivery Vehichles
- Proposed Gates
- Proposed Security Hut
- Proposed Onsite 220kV Substation
- Proposed Telecommunications Tower
- Proposed Met Mast
- Proposed Temporary Construction Compounds
- Proposed Amenity Carparks
- Proposed Peat Deposition Areas
- Existing Pump Station
- Proposed Pump Station Access Road
- Proposed Borrow Pits
- Proposed New Pylons
- Existing Pylon To Be Removed
- Existing Pylon
- Shannonbridge-Maynooth 220kV Overhead Line
- Proposed Overhead Line
- Proposed Tower Pads
- Proposed Crane Pads
- Proposed Gantry Structures
- Proposed TDR SPA Works

Ecological Enhancement

- Marsh Fritillary Habitat Creation
- Woodland Establishment
- Linear Habitat Replanting

Ornithological Enhancement and Mitigation

- Whooper Swan Wetland
- Lapwing Semi-Grassland Mosaic

0 1.5 3 km

Drawing Title
Proposed Wind Farm Layout

Project Title
Lemanaghan Wind Farm, Co. Offaly

Drawn By	Checked By
EM	EC
Project No. 200804	Drawing No. Figure 5-1
Scale 1:87,500	Date 2026-03-09

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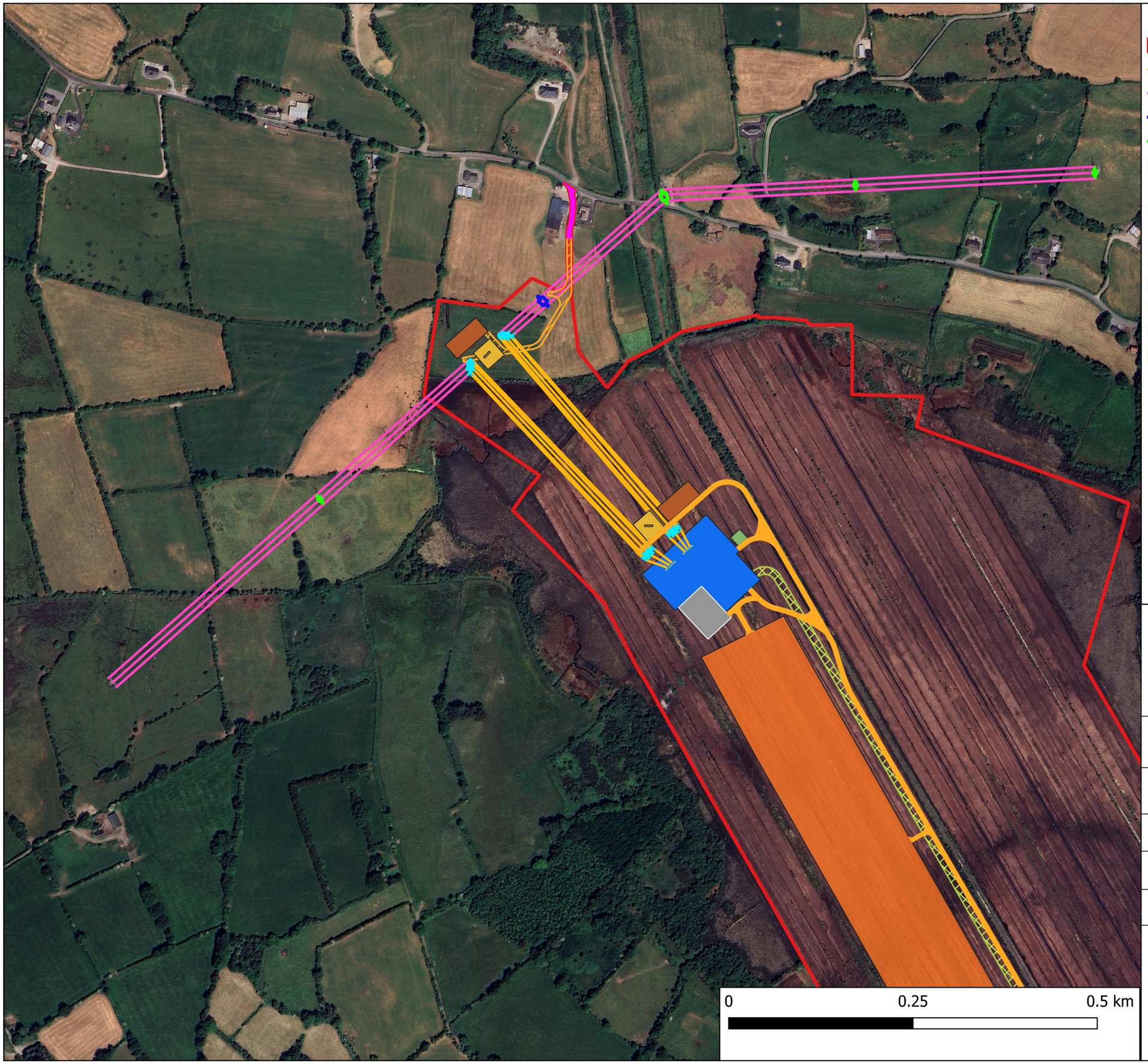

Map Legend

- Planning Application Boundary
- Proposed OHL
- Existing OHL
- Existing Pylon To Be Removed
- Existing Pylons
- Proposed Onsite 220kV Substation
- Proposed Gantry Structures
- Proposed Telecommunications Tower
- Proposed Temporary Construction Compounds
- Proposed Crane Pads
- Proposed Tower Pads
- Proposed New Roads
- Proposed Peat Deposition Area
- Proposed Temporary Works Areas

Drawing Title

Proposed Grid Connection Layout

Project Title

Lemanaghan Wind Farm, Co. Offaly

Drawn By	Checked By
CJ	EC
Project No. 200804	Drawing No. Figure 5-2
Scale 1:5,000	Date 2026-03-09

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5.2 Proposed Project Design Process

The design of the Proposed Wind Farm has been an informed and collaborative process from the outset, involving the project designers, developers, engineers, landowners, environmental, hydrological, geotechnical, archaeological and traffic specialists. The design process has also taken into account the recommendations and feedback from the relevant statutory and non-statutory organisations, local community and local authority where relevant.

The aim of the process being to reduce the potential for environmental effects while designing a commercially viable project capable of being constructed and connected to the national grid.

Throughout the design process, the layout of the Proposed Wind Farm has been revised and refined to take account of the findings of all desk-based assessments, site surveys, investigations and baseline assessments which have brought the design from its first initial layout to the current Proposed Wind Farm layout.

5.2.1 Strategic Site Selection

BnM owns circa 80,000 hectares of land, primarily in the midlands of Ireland. An assessment of potential future uses of this landbank was published by BnM in 2011 in a document entitled '*Strategic Framework for the Future Use of Peatlands*'. This report clearly identified the potential for the development of renewable energy (in particular wind energy) and other developments on BnM lands.

BnM's peatlands offer many advantages for the development of onshore wind farms, including:

- Industrial brownfield sites suitable for redevelopment;
- Of significant scale and present in large blocks;
- Open, unenclosed landscapes with good wind characteristics;
- Linked by rail or road passageways, suitable for cable connection;
- Generally flat and well drained, with minimal dangers of land slippage, and;
- Proven delivery of this type of development, as demonstrated by BnM's Bruckana, Mountlucas, Cloncreen, and Oweninny Wind Farms.

The Project Ireland 2040 National Planning Framework (NPF) identified a range of key future planning and development and place-making policy priorities for the Eastern and Midland Region that includes:

> *"Harnessing the potential of the region in renewable energy terms across the technological spectrum from wind and solar to biomass and, where applicable, wave energy, focusing in particular on the extensive tracts of publicly owned peat extraction areas in order to enable a managed transition of the local economies of such areas in gaining the economic benefits of greener energy."*

The first revision of the NPF[2], published in April 2025, updates the key future planning and development and place-making policy priorities for the Eastern and Midland Region, including:

> *"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, 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 assessment carried out for the determination of a suitable location for the Proposed Project is described in the following sections.

[2] https://cdn.npf.ie/wp-content/uploads/National-Planning-Framework-First-Revision-April-2025-1.pdf

In order to identify candidate sites, i.e., sites considered suitable for wind energy development, BnM conducted a technical review of lands which are either cut away or cutover. This involved desk studies and onsite surveys of the landbank. Known constraints were then applied across the landbank. The constraints applied were derived from various industry and regulatory guidelines, available Geographical Information Systems (GIS) datasets and onsite surveys (carried out as part of the peat extraction activity), and included the following:

- Planning Policy Context;
- Proximity to Sensitive Receptors;
- Peat Depths;
- Suitable wind speeds;
- Proximity to the national electricity grid; and
- Proximity to National and European Designated sites and onsite Environmental Sensitivities.

In order to identify sites within its landbank which might be suitable for wind energy development, BnM conducted a two-stage assessment process.

The first stage comprised the identification of a number of candidate sites via desk studies and onsite surveys of the landbank. Known constraints, derived from various industry and regulatory guidelines, available GIS datasets and onsite surveys (carried out as part of the peat extraction activity), were then applied to the dataset, including:

- Planning Policy Context;
- Proximity to Sensitive Receptors;
- Proximity to the national electricity grid;
- Proximity to National and European Designated sites and onsite Environmental Sensitivities;
- Peat depths, and;
- Suitable wind speeds.

The second stage of the assessment was used to select the sites with the best potential to deliver a successful wind farm project by 2030 to be further developed. This site-specific assessment was guided by the 2013 '*Methodology for Local Authority Renewable Energy Strategies*' report from the Sustainable Energy Authority of Ireland (SEAI) and informed by consultation with BnM's Works Management, Central Engineering, Construction, Ecology, Land and Property, and Planning teams.

Within the second stage of assessment, a number of sites were identified to be progressed by BnM; these include the following sites:

- Littleton, Co. Tipperary
- Ballydermot, Co. Offaly and Co. Kildare
- Consented Ballivor Wind Farm (PL Ref PA25M.316212)
- Clorhane, Co. Offaly
- Coolnamona, Co. Offaly
- Derryarkin, Co. Co. Offaly and Co. Westmeath
- Garryhinch, Co. Offaly and Co. Laois
- Timahoe 2 Solar Farm (Timahoe South), Co. Kildare – Operational Since November 2024
- Ballybeg, Co. Offaly

Key criteria were selected for the site-specific assessment, which not only covered the broad range of issues which can arise from wind farm development but also allowed for direct comparison between candidate sites to determine their relative suitability. The site-specific selection criteria and an outline of the basis for assessment for each criterion are listed in **Table 3-2** of **Chapter 3** of the EIAR. To facilitate the selection process, greater emphasis was placed on certain criteria viewed as critical to site suitability, including environmental sensitivity, grid access/capacity, county development plans and zoning, and proximity to houses.

The criteria can be regarded as either a constraint to the Proposed Project or a facilitator for the Proposed Project. For example, the level of flooding at the site may reduce the available 'buildable' area or the lack of flooding may highlight the suitability of the site. The environmental effect of significant flooding may arise due to a requirement for deeper and more extensive drainage leading to potential downstream surface water impacts. In the case of BnM lands, the existing onsite drainage is a facilitator to the project as surface water is already managed in accordance with the EPA-administrated IPC licence.

The application of the above criteria resulted in the selection of a number of BnM Bogs for candidate wind farm sites, and 8 were identified to be developed via Joint Venture (JV) between BnM and SSE Renewables. These include the Proposed Project site at Lemanaghan Bog in Co. Offaly, which is the subject of the present application. There are 2 no. other projects for which separate planning applications will be submitted in the coming months:

- Littleton Wind Farm, Co. Tipperary; and
- Garryhinch Wind Farm, Co. Offaly and Co. Laois;

There are 5 no. BnM Bogs for which the JV has commenced environmental surveys to potentially develop projects for planning consideration:

- Bellair Bog, Co. Offaly and Co. Westmeath;
- Derryfadda Bog, Co. Galway;
- Coolnagun Bog, Co. Westmeath and Co. Longford;
- Kilberry Bog, Co. Kildare; and
- Cornafulla Bog, Co. Roscommon.

The JV intends to fully assess all these projects for suitability as all were considered to be viable sites for wind energy development. Each is a project in its own right which, if deemed suitable for planning consideration, will be subject to EIA. As such, a description of the reasonable alternatives studied which are relevant to each project and its specific characteristics, together with an indication of the main reasons for selecting the chosen option with regards to their environmental impacts will be provided in the EIAR accompanying the applications for same.

The findings of the site-specific assessment process, which included a comparison of the site selection criteria and potential environmental effects is provided in **Section 3.2.3.3.1** of **Chapter 3** of the EIAR.

5.2.1.1 Suitability of Lemanaghan Bog

Lemanaghan Bog was progressed for detailed assessment and planning consideration due to its relatively low potential for environmental effects and the close proximity of its potential grid connection which would provide environmental and project viability benefits.

Planning Policy Context

The site falls across the administrative area of OCC and therefore, is subject to the planning policies and objectives set out in the OCDP.

County Offaly's Wind Energy Strategy[3] identifies areas within the County according to a hierarchy from the most optimal down to areas not generally considered suitable. There are two categories within the Wind Energy Strategy:

- Open for Consideration for Wind Energy development
- Not deemed Suitable for Wind Energy Development

The proposed 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

[3] https://www.offaly.ie/app/uploads/Combined-Copy.pdf

assessment has been undertaken as part of the design process (see **Chapter 3** of the EIAR, **Section 3.2.5.2**) which demonstrates that this area of the Proposed Project site is a suitable location for a wind turbine. **Table 3-2** of **Chapter 3** of the EIAR presents the findings of the site-specific assessment for the Proposed Project and includes the basis for assessment and potential environmental effects associated with each of the key site selection criteria. Please see **Section 7.2.1** below and **Section 2.6.4** of **Chapter 2** of the EIAR for further information on the OCDP and County Offaly Wind Energy Strategy.

Proximity to Sensitive Receptors

The Applicant sought to identify an area with a relatively low population density. Having reviewed the settlement patterns in the vicinity, the study area has emerged as suitable to accommodate the Proposed Project. The population density of the Population Study Area in 2022 as described in **Chapter 5** of the EIAR is 31.4 persons per square kilometre. This is considerably lower than the national population densities of 73.27 persons per square kilometre and lower than the population density of County Offaly, recorded at 38.96 persons per square kilometre. The proposed turbine positions achieve the recommended setbacks in the DoEHLG 2006 Guidelines and the Draft DoHPLG 2019 Guidelines

The nearest settlement to the proposed turbines is Ballycumber, located approximately 3.7km northwest of the nearest proposed turbine (T15).

Peat Depths

As part of the design process for the Proposed Project, site investigations were undertaken across the Proposed Project site, to provide detail and clarity on the nature and extent of subsoils and bedrock as a means of characterising the Proposed Project site. This provided information on the most suitable location for turbines and associated infrastructure.

A total of 722 no. peat probes have been completed at the Proposed Project site. The combined peat probe dataset shows that peat depths across the Proposed Project site range from 0 to >6m with an average peat depth of 2m. 36% of peat depth probes recorded peat depths of 1.0m to 2.0m, and 23% of peat depth probes recorded peat depths of 2.0m to 3.0m. The remaining 20% of probes recorded peat depths of between 3.0 to 6.2m.

Peat depths have been determined to be suitable for development as outlined in **Appendix 8-1** Geotechnical Peat Stability Risk Assessment (PSRA) of the EIAR. The PSRA identifies that the Proposed Project site '*is suitable for development of the Proposed Project and is considered to be at low risk of peat failure*'.

Suitable Wind Speeds

The Irish Wind Atlas produced by Sustainable Energy Authority of Ireland (SEAI) shows average wind speeds for the country. A suitable wind regime and consistent wind speeds are required for the development of a wind energy project. Wind speeds in the in the midlands bog groups are between 7 – 8 m/s. While the wind resource of Ireland's midlands is lower than that of coastal and elevated regions, it is still very good in comparison with many parts of Europe. Onsite monitoring of the wind resource, which is ongoing, will further verify that with a sufficient turbine height and blade diameter, the wind resource of the site is commercially viable.

Proximity to the National Grid

The Proposed Project intends to connect to the national grid via 0.8km of new overhead line (OHL) from the proposed onsite 220kV substation, in the townland of Cooldorragh, Co. Offaly, and will require to break into the existing Shannonbridge-Maynooth 220kV OHL which runs in a northeast/southwest direction through the northern portion of the Proposed Project site. Details regarding potential alternative grid connection options are considered and presented in **Section 3.2.5.3** of **Chapter 3** of the EIAR.

Proximity to Designated Sites.

The site is not located within any Nationally Designated or Natura 2000 site.

The nearest Natura 2000 site to the Proposed Project site, i.e., Special Area of Conservation (SAC) or Special Protection Area (SPA), is the Ferbane Bog SAC which is located approximately 1.3km southwest of the Proposed Wind Farm.

The nearest national designated site, i.e. Natural Heritage Area (NHA) or proposed Natural Heritage Area (pNHA) to the Proposed Project is the Ferbane Bog pNHA which is located approximately 1.3km southwest of the Proposed Wind Farm.

No Natura areas in the site, low number of Natura sites in the wider area, mainly low value habitat on the site.

5.2.2 Detailed Constraints and Facilitators Mapping

The design and layout of the proposed wind energy development follows the recommendations and guidelines set out in the DoEHLG 2006 Guidelines and the *'Best Practice Guidelines for the Irish Wind Energy Industry'*[4] (Irish Wind Energy Association, 2012).

The DoEHLG 2006 Guidelines are currently the subject of a targeted review. The proposed changes to the assessment of impacts associated with onshore wind energy developments are outlined in the document *'Proposed Revisions to Wind Energy Development Guidelines 2006 – Targeted Review'* (2013), the '*Review of the Wind Energy Development Guidelines 2006 – Preferred Draft Approach'* (June 2017), and the Draft DoHPLG 2019 Guidelines. A consultation process in relation to the Draft DoHPLG 2019 Guidelines closed on 19th February 2020. The proposed changes presented in the Draft DoHPLG 2019 Guidelines give certain focus on the setback distance from residential properties (four times the proposed maximum tip height), along with shadow flicker and noise requirements relative to sensitive receptors. At time of writing, the Draft DoHPLG 2019 Guidelines have not yet been adopted, and the relevant guidelines for the purposes of Section 27(1) and Section 27(2) of the Planning and Development Act 2024 ('the New Planning Act'), remain those issued in 2006.

The constraints mapping process involves the placing of buffers around different types of constraints so as to clearly identify the areas within which no development works will take place. The size of the buffer zone for each constraint has been assigned either using guidance presented in the Draft DoHPLG 2019 Guidelines which is more onerous than the buffer zones as detailed in the current DoHPLG 2006 Guidelines or based on industry best practice.

Notwithstanding this, however, due to the timelines associated with the planning process for renewable energy projects and the commitment within the Climate Action Plan 2025 to publish revised wind energy development guidelines for onshore wind by Q1 2025 (refer to Section 1.2.2), it is possible that the Draft DoHPLG 2019 Guidelines are adopted during the consideration period for the Proposed Project. The relevant guidelines for the purposes of section 28 of the Act, remain those issued in DoEHLG 2006 Guidelines.

The constraints map for the site, as shown in **Figure 5-3**, encompasses the following constraints and associated buffers:

- Residential dwellings plus a minimum 880m buffer to the nearest turbine (meeting the proposed requirement for a separation distance of 4 times the proposed maximum tip height from the curtilage of properties in line with the Draft DoHPLG 2019 Guidelines);
- European (Natura 2000) and Designated sites plus 200m buffer;
- Habitats of County Importance (see Chapter 6: Biodiversity);
- Telecommunication Links plus operator specific buffer;

[4] https://windenergyireland.com/images/files/9660bdfb5a4f1d276f41ac9ab54e991bb600b7.pdf

- Overhead transmission lines plus 3.5 times proposed rotor diameter buffer (as required by EirGrid);
- Watercourses plus 50m buffer; and
- Archaeological Sites or Monuments, plus 'Zone of Notification' as required by the National Monuments Service (ROI).
- Draft DoHPLG 2019 Guidelines wind take separation distance of 2 rotor diameters from adjoining property boundaries
- Draft DoHPLG 2019 Guidelines setback from National and Regional roads and railways of a distance equal to the height of the turbine to the tip of the blade plus 10%.

Facilitators at the site build on the existing advantages and include the following:

- Lands are available for development;
- Good wind resource;
- No Natura 2000 or Designated sites located within the Proposed Project site;
- Proximity to existing 220kV transmission lines for grid connection;
- Accessibility of site via National, Regional, and Local Roads;
- Existing site access points/entrances; and
- Limited extent of constraints.

The inclusion of the constraints on a map of the study area allows for a viable area to be identified. An initial wind farm layout was then developed to take account of all the constraints mentioned above and their associated buffer zones and the separation distances required. Following the mapping of all known constraints, detailed site investigations were carried out.

The ecological assessment of the Proposed Project site encompassed habitat mapping and extensive surveying of birds and other fauna. This assessment, as described in **Chapter 6** of the EIAR, optimised the decision on the siting of turbines and the carrying out of any development works, such as the construction of roads.

The hydrological and geotechnical investigations at the site examined the proposed locations for turbines, roads and other components of the Proposed Project, such as the proposed onsite 220kV substation. Where specific areas were deemed as being unsuitable for the siting of turbines or roads, etc., alternative locations were proposed and assessed, taking into account the areas that were already ruled out by constraints.

The flat topography/nature of the terrain on site reflects the low risk of peat failure. A Peat Stability Risk Assessment (**Appendix 8-1** of the EIAR) was undertaken for the Proposed Project site. A Factor of Safety (FoS) of less than 1.0 indicates that a slope is unstable; a FoS of greater than 1.0 indicates a stable slope. An acceptable FoS for slopes is generally taken as a minimum of 1.3. The stability analysis for this project, which analysed the turbine locations, access roads and substation, resulted in FoS above the minimum acceptable value of 1.3 and hence the site has a satisfactory margin of safety. Please see **Appendix 8-1** of the EIAR for further details.

The archaeological investigations on the site identified all recorded national monuments and protected structures within the vicinity of the Proposed Project and within the site. Through desktop study and detailed field surveys, the archaeology investigations examined the proposed locations for turbines, roads, and other components of the Proposed Project, such as the proposed amenity track and onsite 220kV substation and identified key constraints and appropriate buffers / mitigation to inform design. Please see **Chapter 13** of the EIAR for further details.

The turbine layout for the Proposed Project has also been informed by wind data, the results of noise assessments, shadow flicker and the separation distance to be maintained between turbines. Thus, the baseline environmental assessment of the site and wind farm design was an iterative process, where findings at each stage of the assessment were used to further refine the design, always with the intention of minimising the potential for environmental impacts.

As the Proposed Wind Farm design was refined, the biodiversity and ornithology mitigation and enhancement measures, detailed in the BMEP included as **Appendix 6-5** of the EIAR, for the Proposed

Project were also refined through an iterative design process. This process is outlined in **Section 3.2.5.2.2** of **Chapter 3** of the EIAR.

Please refer to the constraints and facilitators map in **Figure 5-3** below.

Ferbane Bog SAC

Map Legend

EIAR Site Boundary

Sensitive Receptors

Sensitive Receptors

880m Sensitive Receptor Buffer

Hydrology

Watercourse

Watercourse 50m Buffer

Drains

Drains 20m Buffer

Public Well

Cultural Heritage

National Monuments

Class 1 Togher Buffer

Class 2 & 3 Togher Buffer

SMR Zone

Designated Sites

Special Area of Conservation

SAC 200m Buffer

Proposed Natural Heritage Area

pNHA 200m Buffe

Telecoms

Telecoms Links

20m Telecoms Buffer

Drawing Title

Constraints Map

Project Title

Lemanaghan Wind Farm

Drawn By	Checked By
CJ	EC
Project No.	Drawing No.
200804	Figure 5-3
Scale	Date
1:25,000	2026-03-25

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5.2.3 Turbine Layout Design Process

The design of the Proposed Wind Farm has been an informed and collaborative process from the outset, involving the designers, developers, engineers, landowners, environmental, hydrological, geotechnical, archaeological, and traffic specialists.

Throughout the preparation of the EIAR, the layout of the Proposed Wind Farm has been revised and refined to take account of the findings of all site investigations and baseline assessments, which have brought the design from its first initial layout to the Proposed Wind Farm layout. The design process has also taken account of the recommendations and comments of the relevant statutory and non-statutory organisations, the local community and local authorities as detailed in **Chapter 2** of the EIAR, while still seeking to ensure that a viable project can ultimately be constructed and connected to the national grid.

The final design of the Proposed Wind Farm takes account of all site constraints and the distances to be maintained between turbines and from houses, roads, etc. The layout is based on the results of all site investigations that have been carried out during the EIAR process and the EIA scoping process with statutory and non-statutory consultees. As information regarding the Proposed Project was compiled and assessed, the number of turbines and the proposed layout have been revised and amended to take account of the physical constraints of the Proposed Project site and the requirement for buffer zones and other areas which should be avoided. The selection of the number of turbines and layout of same also had regard to wind-take and the separation distance to be maintained between turbines, as well as landscape and visual, cultural heritage, noise and shadow flicker impacts. The EIAR and Proposed Project design process was an iterative process, where findings at each stage of the assessment were used to further refine the design, always with the intention of minimising the potential for environmental impacts.

The development of the final Proposed Project layout has resulted following feedback from the various studies and assessments carried out as well as ongoing negotiations and discussions with landowners and the local community.

There were several reviews of the specific locations of the various turbines during the optimisation of the Proposed Wind Farm layout. The initial constraints study identified a significant viable area within the overall study area of the site. The initial turbine layout comprised 17 no. turbines within the same study area. The proposed 15-turbine final layout has been refined following feedback from the project team, the local community, and the need to ensure sufficient separation distances are maintained for onsite constraints. The Proposed Project went through eight separate iterations; within **Chapter 3** an overview of all eight turbine layout iterations have not been included, but **Plates 3-1** to **3-5** in **Chapter 3** show how the design of the turbine layout evolved during the design process.

A number of grid connection options were assessed for the Proposed Project. Post preliminary wind farm design, the grid infrastructure in and around the site was assessed. A desktop analysis was undertaken using identified constraints to identify three potential routes from the Proposed Wind Farm to the existing Shannonbridge-Maynooth 220kV OHL as identified from the TLI Assessment which is detailed in **Chapter 3**, **Section 3.2.5** of the EIAR.

As the overhead line travels in a northeast to southwest orientation, the northernmost end (near Site Entrance 6) and the western most section (near Site Entrance 1) of the site were selected as the most suitable locations for the proposed onsite 220kV substation.

The TLI Group was engaged by the Applicant to carry out a preliminary grid route assessment for the Proposed Project, including feasibility of proposed substation locations. A desktop analysis was undertaken using identified constraints to identify three potential substation locations. An assessment was carried out to determine three potential locations for the proposed onsite substation: Substation Alternative 1 (Chosen Option), Substation Alternative 2, and Substation Alternative 3. **Plate 3-6** in **Chapter 3** demonstrates all three proposed substation locations which are further detailed below.

Further details of the design process and a selection of design iterations can be found in **Chapter 3**, **Section 3.2.5** of the EIAR.

6. LEGISLATIVE CONTEXT

6.1 Planning and Development Act 2000 (as amended)

Strategic Development Infrastructure

This planning application for the Proposed Project is being made pursuant to Section 37E of the Planning Act. Section 37E provides the statutory framework for the assessment of applications for strategic infrastructure development (SID) which, by reason of their nature and scale, are of strategic economic or social importance to the State or the region concerned. Threshold for SID infrastructure is established in the 7th Schedule of the Planning Act. The relevant threshold established in the 7th Schedule for the Proposed Project provided below:

"An installation for the harnessing of wind power for energy production (a wind farm) with more than 25 turbines or having a total power output greater than 50MW".

Along with meeting the threshold established in the 7th Schedule, one or more of the following criteria, set out under Section 37A(2) of the Planning Act, must be satisfied.

i. *be of strategic economic or social importance to the State or the region in which it would be situate,*
ii. *contribute substantially to the fulfilment of any of the objectives of the National Planning Framework or of any regional spatial and economic strategy, or*
iii. *have a significant effect on the area of more than one planning authority,*

The Proposed Project exceeds the 7th Schedule threshold and meets the criteria set out under Section 37A(2) of the Planning Act.

In accordance with Section 37B of the Planning Act, the Applicant engaged in pre-application consultations with ACP in order to determine whether the Proposed Project constituted a SID project. Following consideration of the submissions made and the nature, scale and characteristics of the Proposed Project, the Commission formed the opinion, under Section 37A(2), that the Proposed Project does fall within the definition of strategic infrastructure development within the meaning of the Planning Act. The Commission served notice of their opinion under Section 37B(4)(a) on 3rdMarch 2026.

Accordingly, pursuant to Section 37E(1) of the Planning Act, the application for permission for the Proposed Project is being made directly to the Commission.

RED III

On 6th August 2025, the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. No. 274 of 2025) were 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 (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.

Appendix 1 of the Cover Letter included with this application includes a table demonstrating compliance with the 'schedule of information to inform the completeness check' as appended by the Commission to the SID determination. An additional 'Note' column has been added to provide additional context to ACP. It is the Applicant's view that the planning application satisfies the completeness check.

Requirement for EIAR

The EIA Directive 2011/92/EU, as amended (the 'EIA Directive'), has been incorporated into Irish law primarily through the Planning Act and the Planning and Development Regulations 2001, as amended ('the Regulations').

Part 2 of Schedule 5 of the Regulations identifies classes and scales of development that require Environmental Impact Assessment (EIA). The relevant class of development in this case relates to "*installations for the harnessing of wind power for energy production (wind farms) with more than 5 turbines or having a total output greater than 5 megawatts*", as per Item 3(i) of the Schedule. The Proposed Project exceeds 5 Megawatts in scale and proposes more than 5 turbines and therefore is subject to EIA. As such, the application for the Proposed Project is accompanied by an EIAR.

Requirement for AA / NIS

Article 6(3) of the Habitats Directive sets out the requirement for an Appropriate Assessment (AA) of any plan or project that is not directly related to the management of a protected site but is likely to have a significant effect on it. This assessment evaluates the potential implications for the site in light of its conservation objectives. Competent authorities are mandated to grant development consent only if it is ascertained that a proposed project will not adversely affect the integrity of the site concerned or if it will, if there are imperative reasons of overriding public interest why it should proceed, and the relevant criteria is met.

Under Section 177U of the Planning Act, the legal requirements pertaining to AA set out in Part XAB of the Planning Act, apply to this application for development permission under Section 37E. This application for development permission is therefore accompanied by an AA Screening Report and an NIS.

6.1.2 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, after passing in both Houses of the Oireachtas. At the time of lodgement of this planning application, the Planning and Development Act 2000 (as amended) remains in place until such time as the New Planning Act is commenced by Ministerial Orders, with the Government indicating that this will be done on a phased basis.

Should the consenting provisions of the New Planning Act commence while this application is being decided, it is noted that, upon repeal of the Planning Act, a grant of permission under S.37G will be deemed to be a permission granted under S.123 of the New Planning Act.

6.2 Climate and Renewable Energy Legislation

6.2.1 European Legislation

The Renewable Energy Directive (RED) is the EU's legal framework for the development of renewable energy across all sectors of the EU economy, supporting clean energy cooperation across EU countries. Since its adoption in 2009, the RED has evolved through three major iterations-RED I (2009), RED II (2018), and RED III (2023)-each raising ambition to support decarbonisation and energy security.

Under RED I, Member States were legally required to meet a 20% share of renewables in final energy consumption by 2020. RED II increased this target to 32% by 2030. Most recently, RED III, which entered into force in November 2023, raised the target further to 42.5% by 2030, with an indicative ambition of 45%, in line with the REPowerEU Plan.

In order to ensure that the RED III target of 42.5% is achieved, EU Member States must notify their climate and energy objectives, targets, policies, and measures to the European Commission and were established under Regulation (EU) 2018/1999 of the European Parliament and of the Council on the

Governance of the Energy Union and Climate Action ('the Governance Regulation')[5]. The Department of the Environment, Climate and Communications (DECC) submitted an updated National Energy and Climate Plan (NECP) 2021-2030 to the European Commission in July 2024. The updated NECP committed to achieving a 43% share of renewable energy in total energy consumption by 2030. In the trajectories set out in the updated NECP, it states that Ireland's proposed trajectory will not be in line with the desired trajectory set out in the Governance Regulation.

Given that, of 27 EU member states, Ireland had one of the lowest proportions of renewable energy at 16% in 2024[6], the implementation of RED III represents both a legal obligation and an opportunity to remove procedural bottlenecks that hinder critical infrastructure, such as the Proposed Project.

6.2.2 National Legislation

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

The Climate Action and Low Carbon Development Act 2015 (as amended) ('the Climate Act') establishes a legislative imperative 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 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 Supreme Court judgment on 4th February 2026 (Coolglass Wind Farm Limited v An Coimisiún Pleanála [2026] IESC 5) confirmed that consenting

[5] *Regulation (EU) 2018/1999 of the European Parliament and of the Council on the Governance of the Energy Union and Climate Action, available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32018R1999*
[6] *https://ec.europa.eu/eurostat/statistics-explained/index.php?title=File:Renewable_energy_2024_infographic.jpg*

authorities must make decisions in a manner 'consistent with' the approved national long term climate action strategy, '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.

7. PLANNING POLICY CONTEXT

The following section provides a summary of the planning, renewable energy and climate policy context relevant to the Proposed Project. A more detailed and comprehensive breakdown of planning policy at all levels is set out in **Chapter 2** of the EIAR.

It is clear from the policies outlined below that the Proposed Project is strongly supported in principle by policy at all levels, except for the unfavourable wind energy zoning that applies to a small portion of the site, (specifically T05, which is on the border of favourable and unfavourable wind energy zoning), which is comprehensively addressed within this Planning Report and throughout the EIAR. The following section contains a synopsis of the current policies in place and their relevance to the Proposed Project.

The Proposed Project sits within a policy framework characterised by several recent crises, which have significantly influenced policy changes in recent years. These crises have heightened the imperative for Ireland to transition towards a renewable energy-focused electricity grid and have emphasised the necessity for diversifying its energy sources.

7.1 International, National and Regional Policy

7.1.1 International Policy

Paris Agreement

On an international level, Ireland is a signatory of the Paris Agreement, a global initiative adopted in 2015 that aims to address climate change by limiting global warming to well below 2 degrees Celsius above pre-industrial levels, with efforts to limit the increase to 1.5 degrees Celsius. Under the Paris Agreement, countries submit Nationally Determined Contributions (NDCs), outlining their individual climate action plans and commitments. Ireland's contribution comes under the European Union's (EU) NDCs targets and is based on the European Union's 2030 emissions reductions targets.

European Green Deal

On a European level, 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. 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 existing target, upwards from 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.

The EU Fit for 55

The EU Fit for 55 package was published in late 2021 with the aim of reducing EU emissions by at least 55% by 2030 compared to 1990 levels and making the EU carbon-neutral by 2050. This EU package is a set of proposals to revise all existing EU acts on climate and energy and increase the EU target for renewables in the overall energy mix from 32% in 2030 to 40%.

Renewable Energy Directive & REPowerEU

In November 2023, a revision of the Renewable Energy Directive[7] (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 at 42.5%, with an ambition to reach 45% by 2030. This increase comes following the Russian invasion of Ukraine and the publication of REPowerEU plan in May 2022. REPowerEU aims to make Europe independent from Russian fossil fuels including oil and gas by rapidly transitioning to renewable energy. The plan aims to accelerate the scale up of renewables by speeding up the permitting process and placing renewable energy developments in the category of overriding public interest. Notwithstanding that REPowerEU specifically relates to making Europe independent from fossil fuels imported from Russia, the provision of indigenous renewable energy developments such as the Proposed Project, will reduce Ireland's vulnerability to price fluctuations and geopolitical risks associated with the importation of fossil fuels.

7.1.2 National Policy

Climate Action Plan 2025

CAP 25 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).

National Development Plan 2021 – 2030

The National Development Plan 2021 – 2030 (NDP) sets out the major public investment projects identified by 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 subject development, climate change. It is stated that the NDP will be the *'largest and greenest ever delivered in Ireland'*, and in this regard, the NDP highlights that extensive consultation was undertaken to ensure that the plan adequately supports the implementation of climate action measures.

One of the NDP's strategic climate priorities in 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 an ambitious and an explicit driver for the deployment of new renewable generators such as the Proposed Wind Farm. The focus of investment in renewable energy infrastructure is to contribute to a long-term, sustainable and competitive energy future for Ireland.

The National Development Plan Review 2025 (NDP Review) sets out a comprehensive capital investment framework for the period 2026-2035, totalling €275.4 billion. Within this framework wind energy is recognised as a key enabler of the State's legally binding commitment to reduce greenhouse gas emissions by 51% by 2030, including a 75% reduction in emissions from the electricity sector. To support the expansion of renewable electricity generation, the Government has allocated €3.5 billion in equity funding to ESB Networks and EirGrid to enhance grid transmission and distribution infrastructure, which will directly facilitate increased integration of wind energy developments such as the Proposed Project.

[7] *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)*

National Planning Framework First Revision (2025)

On 8th 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. **National Strategic Outcome 8** to Transition to a Carbon Neutral and Climate Resilient Society remains unchanged.

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.** This target is the largest of all 3 regions (Northern and Western: 1,389 MW, Southern: 978 MW).

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 Revised NPF has identified the post-industrial peatlands of the Eastern and Midland region as potentially suitable locations for some of this onshore wind energy, 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*'.

For the Eastern and Midland Region in particular, the Framework 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 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. Regarding 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.

National Energy Security Framework

The National Energy Security Framework (NESF), adopted in 2022, and implements many of the aims and objectives of REPowerEU on a national level, reinforcing the State's requirement to urgently diversify away from imported fossil fuels and accelerate the roll out of renewables. The NESF is supported by the recently published Energy Security Package 'Energy Security in Ireland to 2030'. The Energy Security Package provides further long-term energy security measures which includes the prioritisation of achieving a renewables-led energy system.

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 are 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 Greenhouse Gas emissions by an average 7% per annum over the next decade in a push to achieve a net zero emissions by the year 2050.

Regarding 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.

Wind Energy Development Guidelines 2006

In June 2006, the then Department of Environment, Heritage and Local Government (DoEHLG) published the 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.

Draft Wind Energy Development Guidelines 2019

The Department of Housing, Planning and Local Government (DoHPLG) published 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 (DoHLGH) and the Department of Environment, Climate and Communications (DoECC), 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.

7.1.3 Regional Policy Context

Regional and Economic Spatial Strategy for the Eastern and Midlands Region 2019-2031

The RSES for the Eastern and Midlands Region recognises that climate change is impacting and will continue to impact many of the policies and objectives contained in the RSES, and as such, informs policies including those in relation to flood risk management and surface water drainage, settlement strategy, transport, waste management, water services, energy, natural heritage, and green and blue infrastructure.

With regards to the current situation, the RSES notes an overall increase in greenhouse gas emissions from most sectors. The main emissions sources which are relevant to the Region include electricity, built environment, the transport sector and agriculture. To support transition to a low carbon, circular & climate resilient region, the Eastern and Midland Regional Assembly is committed to the Region

becoming a low-carbon and circular region. This will require reduction of all greenhouse gases, of which carbon dioxide is the most prominent.

The priority is to minimise energy demand and waste and then address how energy will be supplied and renewable technologies incorporated. In order to address this, it is necessary to reduce the effects of climate change through settlement and travel patterns, energy use, waste and protection of green infrastructure.

Table 7-1 below sets out the compliance of the Proposed Project against relevant policy at an International, National level and Regional.

Table 7-1 International, National & Regional Policy Objective and Compliance Summary Table

Policy Document	Targets / Objectives	Compliance
Paris Agreement	Limit global warming to well below 2 degrees Celsius above pre-industrial levels, with efforts to limit the increase to 1.5 degrees Celsius.	The Proposed Project will generate clean, renewable and sustainable wind energy which will reduce reliance on greenhouse gas emitting fossil fuels for energy generation. This will contribute to limiting global warming.
Renewable Energy Directive	42.5% renewable energy by 2030, aiming for 45%.	The Proposed Project will increase Ireland's renewable energy share, contributing towards Ireland's climate and energy obligations under EU law.
REPowerEU	› Accelerate the roll-out of renewables. › Increase the 2030 target for renewables from 40%-45%. › Tackle slow and complex permitting for major renewable projects	Considering the urgency required under the REPowerEU, it is imperative that all suitable sites, such as the site of the Proposed Project, are developed as soon as possible, in accordance with proper planning and sustainable development.
European Green Deal	› Increase renewable energy share › Reduce greenhouse gas emissions › Clean energy transition	The Proposed Project will generate and provide clean renewable onshore wind energy which will increase Ireland's renewable energy share, reduce reliance on greenhouse gas emitting fossil fuels for energy generation and will support the transition to a clean, renewables led energy system.
Climate Action Plan 2025	9GW of onshore wind by 2030, 6GW by 2025.	The Proposed Project will contribute directly towards the CAP25 goals of 9GW of wind energy by 2030. Onshore wind is identified as being critical in the decarbonisation of the electricity sector and as such the Proposed Wind Farm should be considered in that regard.
The National Planning Framework First Revision	National Strategic Outcome 8: Transition to a low carbon and climate resilient economy.	The Proposed Project is in line with the National Strategic Outcome 8 of the Revised NPF which seeks to transition to a low carbon and climate resilient economy. If permitted, the Proposed Project will

		contribute to the achievement of National Policy Objectives 70, 71, 73, 74 and 75.
National Development Plan 2021 - 2030	National Strategic Outcomes 8: Transition to a Climate-Neutral and Climate Resilient Society	The NDP is clear in its priority to reach a low-carbon, climate resilient society over the lifetime of the plan. The Proposed Project, if permitted, will provide clean, renewable electricity to the national grid, furthering development objectives of the NDP.
The National Energy & Climate Plan 2021 – 2030	› Decarbonisation - Renewable energy › Energy security	The Proposed Project will contribute to achieving key decarbonisation and energy security objectives by adding a new renewable electricity generator to the national grid.
National Energy Security Framework	› Ensuring security of energy supply in the near-term; › Reducing our dependency on imported fossil fuels in the context of the phasing out of Russian energy imports across the EU.	The Proposed Project will reduce the need for imported fossil fuels for electricity, improving national energy security.
Energy Security in Ireland to 2030 – Energy Security Package	› Reduced and Responsive Demand. › Renewables-Led System. › More Resilient Systems. › Robust Risk Governance.	The Proposed Project supports the objectives to ensure the State's energy security. The Proposed Project serves as a domestic renewable energy generator capable of providing clean electricity to the national electricity grid.
Wind Energy Guidelines	› Acceptable noise thresholds and monitoring frameworks › Visual amenity setback and spacing › Control of shadow flicker › Compliance with Community consultation and dividend requirements › Consideration of the siting, route and design of the proposed grid connection as part of the whole project.	The Proposed Project complies with the requirements set out by the DoEHLG 2006 Guidelines, including noise, set back, shadow flicker, and community consultation guidelines. It is anticipated that the Proposed Project will be capable of adhering to the Draft DoHPLG 2019 Guidelines when finalised.
Eastern and Midland Region – Regional Economic & Spatial Strategy	› **RPO 7.31:** Within 1 year of carrying out a regional emissions assessment, EMRA shall compile and publish an emissions inventory and, in collaboration with the relevant departments and agencies, agree emissions reductions targets in	The Proposed Project will generate clean and renewable wind energy, reducing reliance on greenhouse gas emitting fossil fuels for energy generation and supporting the region's transition to a low-carbon, climate resilient and sustainable economy and society.

	accordance with agreed national sectoral plans and to support an aggregate 40% reduction in greenhouse gas emissions by 2030 in line with the EU 2030 Framework. › **RPO 7.32:** With the assistance and support of the Climate Action Regional Offices, local authorities shall develop, adopt and implement local climate adaptation and mitigation strategies which shall address issues including local vulnerability to climate risks and identify and prioritise actions, in accordance with the Guiding Principles of the National Adaptation Framework, National Mitigation Plan.	The Proposed Project which is a renewable energy development will align with national climate and renewable energy policy and targets as set out in the RSES.

Table 7-2 Eastern and Midland Regional Assembly - Regional Economic & Spatial Strategy, Guiding Principles for Development on Peatland Areas

Policy / Legislative Document	Targets / Objectives	Compliance
Eastern and Midland Regional Assembly - Regional Economic & Spatial Strategy Guiding Principles for Development on Peatland Areas	In the consideration of development on peatland areas, the following Guiding Principles should apply:	
	› Consideration of the potential contribution of peatlands to climate change mitigation and adaptation including renewable energy production.	The Proposed Project, which includes the Proposed Wind Farm and the Proposed Grid Connection, is primarily located within a peatland setting and aligns with this guiding principle as it will provide a renewable energy development that will generate and supply renewable wind energy to the national electricity grid.
	› Consideration of habitats and species of environmental significance.	Habitats and species of environmental significance are considered in the NIS, and **Chapter 6** and **Chapter 7** of the EIAR. Please refer to **Table 7-3** and **Table 7-5** of the Planning Report, along with the NIS, and **Chapter 6** and **Chapter 7** of the EIAR for further details.

	› Consideration of the potential contribution of peatlands to an existing or proposed greenway/blueway/peatway network.	The Proposed Project will upgrade approximately 1.14km of existing track within the site and provide approximately 17.1km of new roads to be used for maintenance and monitoring activity as well as for amenity purposes such as walkways and cycleways when the Proposed Wind Farm becomes operational. An additional 3.9km of a new dedicated amenity link, along with the further upgrade of approximately 1.8km of existing track, for the purposes of amenity, is also proposed as part of the Proposed Project to provide a greater variety of walking loops. If planning permission is granted for the Proposed Wind Farm, the associated amenity pathways will connect into the permitted Offaly West portion of the Midlands Trail Network. Please refer to **Chapter 4** of the EIAR for further details.
	› Consideration of the ecosystem services and tourism potential provided by peatlands.	
	› Development of peatlands shall ensure that there are no negative impacts on water quality.	Potential impacts on water quality are considered in **Chapter 9** of the EIAR. Please refer to **Table 7-3** and **Table 7-5** of this Planning Report, along with the **Chapter 9** of the EIAR for further details.

7.2 Local Policy Context

7.2.1 Offaly County Development Plan 2021-2027

The Offaly County Development Plan 2021-2027 (OCDP) was adopted in September 2021 and came into effect in 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 OCDP sets out the strategic vision for Co. Offaly and is as follows:

> *To create a sustainable and competitive county that supports the health and wellbeing of our people and places, from urban to rural, with access to employment opportunities supported by high quality housing and physical, social and community infrastructure for all, in a climate resilient manner and with respect for our biodiversity.*

The strategic objective of the OCDP relevant to the Proposed Project is as follows:

- Achieve transition to a competitive, low carbon, climate resilient and environmentally sustainable economy. This should be facilitated through reducing the need to travel, by integrating land use and sustainable modes of transport, and by reducing the use of non-renewable resources. In line with this, promote active and healthy lifestyles through increased opportunities for walking, cycling and active sport recreation.

The Proposed Project as a renewable energy development will support Co. Offaly in realising and achieving its strategic vision and objectives to create a sustainable, low-carbon, climate-resilient and environmentally sustainable economy and society by generating and providing c. 90MW of renewable wind energy. The Proposed Project will reduce the county's reliance on non-renewable resources for energy generation such as fossil fuels by providing a renewable wind energy generator, subsequently reducing greenhouse gas emissions.

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".*

The OCDP includes policies in relation to climate action and reducing greenhouse gas emissions which aligns the County with wider European, national and regional objectives. The OCDP also includes policies regarding renewable energy and electricity grid infrastructure. **Table 7-3** below sets out the policies and objectives within the OCDP relevant to the Proposed Project. A statement of compliance is included with regard to each relevant policy outlined. It is demonstrated through **Table 7-3** that the Proposed Project is in compliance with the relevant policies and objectives of the OCDP.

Table 7-3 Local Policy Objective and Compliance Summary Table

Policy Theme	Policy/ Objective	Compliance
Climate Action	**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.	The Proposed Project is in compliance with **CAEP-07** as it directly contributes to the onshore wind energy target of 9GW as set out in CAP25. The Proposed Project will generate clean, renewable electricity, which will be integrated into the grid, helping to electrify and decarbonise other sectors, reducing the reliance on imported fossil fuels and as such reducing emissions of greenhouse gases. This will also aid in achieving the climate change and renewable energy objectives to reach national targets and transition to a low-carbon economy.
	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.	By supplying sustainable renewable wind energy, the Proposed Project will reduce the need for greenhouse gas emitting, non-renewable sources like coal and oil for energy generation, helping to transition toward a low-carbon economy and cleaner energy usage in the County. By providing c. 90 MW of installed energy generating capacity, the Proposed Project will support the County and the State to transition to a low-carbon and climate-resilient society.
	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.	By providing c. 90 MW of renewable wind energy the Proposed Project is in line with **CAEP-11**, as it will reduce reliance on fossil fuels for energy generation, reducing greenhouse gas emissions and supporting the transition towards a climate-resilient, and environmentally sustainable economy and society.

Policy Theme	Policy/ Objective	Compliance
Renewable Energy	**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.	The Proposed Project which is a wind energy development aligns with **CAEP-25**, as it will generate clean, renewable wind energy.
	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.	The Proposed Project as a wind energy development aligns with **CAEP-37**, as it will generate clean, renewable energy which will be integrated into the grid, helping to electrify and decarbonise other sectors, therefore, reducing the reliance on imported fossil fuels and improving the sustainability and security of Ireland's national and regional energy system. The Proposed Project will support the achievement of national targets in relation to reductions in fossil fuel dependency and 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; › have regard to Development Management Standard 109 on wind farms contained in Chapter 13 of the Plan; and › have regard to existing and future international, European, national and regional policy, directives and legislation.	**Table 7-5** of this Report provides a compliance statement against the OCDP Wind Energy Development Management Standards (Development Management Standard 109), which include; the 2006 Guidelines and Draft 2019 Guidelines; the OCDP Wind Energy Strategy Designation Areas and all other development management standards in relation to wind energy as set out in Chapter 13 of the OCDP. Please refer to **Table 7-5** of this Planning Report for further details. The EIAR, NIS and this Planning Report demonstrate that the Proposed Project is supported by existing international, European, national, regional and local policy and objectives.

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	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.	The Proposed Project will support the national policies in relation to climate action and renewable energy by generating sustainable renewable energy. The Proposed Project will also contribute to the achievement of 9GW onshore wind energy and 80% renewable energy by 2030 as set out in CAP25. It should also be noted that the layout of the Proposed Project has been designed to minimise the potential environmental effects, while at the same time maximising the energy yield from the wind resource at the Proposed Project site. Constraint studies, as described in **Chapter 3** of the EIAR, have been carried out to ensure that turbines and all ancillary infrastructure are located in the most appropriate areas of the site.
	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.	The Proposed Project aligns with **CAEO-04** as it will generate clean, renewable electricity, which will be integrated into the grid, helping to electrify and decarbonise other sectors, therefore, reducing the reliance on imported fossil fuels and improving the sustainability and security of the national, regional and County energy system. The EIAR, NIS and this Planning Report demonstrate that the Proposed Project is in line with the proper planning and sustainable development of the area in which the Proposed Project site is located.
	CAEO-05 It is an objective of the Council to implement the Council's Wind Energy Strategy as follows: 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;	The vast majority of the Proposed Project Site is located in an area 'Open to Consideration' for wind energy development. **Table 7-5** of this Report provides a compliance statement against the OCDP Wind Energy Development Management Standards, which include; the 2006 Guidelines and Draft 2019 Guidelines; the OCDP Wind Energy Strategy Designation Areas and all other development

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	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 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.	management standards in relation to wind energy as set out in Chapter 13 of the OCDP. Please refer to **Table 7-5** of this Report for further details.
Grid Infrastructure	**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.	The provision of new renewable energy transmission infrastructure such as the Proposed Grid Connection is in line with **CAEP-01**. The Proposed Grid Connection will facilitate the transmission of renewable electricity from the Proposed Wind Farm to the national electricity grid.
	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.	The Proposed Project which includes the Proposed Grid Connection aligns with **CAEP-05** by facilitating the Proposed Wind Farm's connection to the national electricity grid. By facilitating the transfer of renewable wind energy to the national electricity grid the Proposed Grid Connection is supporting County Offaly to maximise its renewable energy resource, transition to a low-carbon and climate-resilient county, and supporting the achievement of national renewable energy targets.

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Peatlands	**CAEP-16** It is Council policy to support the preparation of a comprehensive after use framework plan for the industrial peatlands and associated workshops, office buildings and industrial sites in the midlands and adjacent parts of the north west and southern regions, which meets the environmental, economic and social needs of communities in these areas, and also demonstrating leadership in climate change mitigation and land stewardship. The Council recognises that the industrial peatlands in the midlands are a significant resource will transition to after uses ranging from amenity, tourism, biodiversity services, 'wild areas', flood management, climate mitigation, energy development, industry, education, conservation and many more.	The Proposed Project, which comprises a renewable energy development located within a peatland setting, aligns with **CAEP-16**. The Proposed Project will generate and supply clean and sustainable renewable wind energy to the national grid, making use of the County's wind resources in a former industrial peatland setting. The Proposed Project will support the transition of County Offaly's long history of power generation towards a low-carbon, climate-resilient, renewable and sustainable energy system.
	CAEP-17 It is Council policy to investigate the potential for a Green Energy Hub on peatlands in the county and facilitate it if possible.	The Proposed Project which is a renewable wind energy development located within a peatland setting aligns with **CAEP-17**.
	CAEP-18 It is Council policy to investigate the feasibility of an energy park with educational and amenity facilities relating to any future development of renewable energy projects of significant scale that comes forward over the lifetime of this Plan. Any development of renewable energy on cutaway bog will be required to provide increased opportunities for amenity access and educational facilities.	The Proposed Project will upgrade approximately 1.14km of existing track within the site and provide approximately 16.9km of new roads to be used for maintenance and monitoring activity as well as for amenity purposes such as walkways and cycleways when the Proposed Wind Farm becomes operational. An additional 3.9km of a new dedicated amenity link, along with the further upgrade of approximately 1.8km of existing track, for the purposes of amenity, is also proposed as part of the Proposed Project to provide a greater variety of walking loops. If planning permission is granted for the Proposed Wind Farm, the associated amenity pathways will connect into the permitted Offaly West portion of the Midlands Trail Network. Please refer to **Chapter 4** of the EIAR for further details.

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	CAEP-19 It is Council policy that planning applications for development on or immediately adjacent to peatlands shall be accompanied by assessments considering the following issues where relevant; peatland stability, hydrology, carbon emissions balance and ecological impact assessment.	Please refer to the EIAR and NIS submitted with the planning application for further details on assessments carried out in relation to the Proposed Project.
	CAEO-07 It is an objective of the Council to ensure that renewable energy projects located on peatlands or in close proximity to peatlands do not negatively impact on any rehabilitation measures including enhanced rehabilitation measures (i.e. drain blocking and rewetting).	Irrespective of the granting of planning permission or construction of the Proposed Project, the measures outlined in the Draft Rehabilitation Plan (**Appendix 2-4** of the EIAR) will be implemented by BnM in agreement with the EPA, per the BnM's IPC Licence Obligations (P0500-01). The proposed biodiversity enhancement and mitigation measures have been designed with due regard for ongoing and future rehabilitation activities on the site.
Green Infrastructure	**BLP-28** It is Council policy to protect existing green infrastructure within the county, to provide additional green infrastructure where possible and to encourage green infrastructure to be spatially connected to facilitate the extension or establishment of ecological corridors.	The Proposed Project will upgrade approximately 1.14km of existing track within the site and provide approximately 16.9km of new roads to be used for maintenance and monitoring activity as well as for amenity purposes such as walkways and cycleways when the Proposed Wind Farm becomes operational. An additional 3.9km of a new dedicated amenity link, along with the further upgrade of approximately 1.8km of existing track, for the purposes of amenity, is also proposed as part of the Proposed Project to provide a greater variety of walking loops. If planning permission is granted for the Proposed Wind Farm, the associated amenity pathways will connect into the permitted Offaly West portion of the Midlands Trail Network. Please refer to **Chapter 4** of the EIAR for further details.
	BLP-30 It is Council policy to integrate the provision of green infrastructure with infrastructure provision and replacement, including walking and cycling routes, as appropriate, while protecting natural heritage.	
	TRP-16 It is Council policy to support the extension of greenways, blueways, peatways and trails within the county and the integration and linkage of them with other existing / proposed greenways, blueways, peatways and trails both within and outside County Offaly.	
	TRO-12 It is an objective of the Council to investigate the feasibility of an Energy Park with educational and amenity facilities, relating to any future development of renewable energy projects of significant scale that comes forward over the lifetime	

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	of this plan. Any development of renewable energy on cutaway bog will be required to provide increased opportunities for amenity access and education facilities.	
Reasonable Alternatives	**CAEP-23** It is Council policy to require that environmental assessments should address reasonable alternatives for the location of new energy developments, and where existing infrastructural assets such as sub-stations, power lines and roads already exist within the proposed development areas, then such assets should be considered for sustainable use by the proposed development where the assets have capacity to absorb the new development.	**Chapter 3** of the EIAR contains a description of the reasonable alternatives that were assessed, which are relevant to the Proposed Project and its specific characteristics, in terms of site location and other renewable energy technologies as well as site layout incorporating size and scale of the Proposed Project, connection to the national grid and transport route options to the site. **Chapter 3** also outlines the design considerations in relation to the Proposed Wind Farm and the Proposed Grid Connection. It provides an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects. Please refer to **Chapter 3** of the EIAR for further details.
Population and Human Health	**ENVP-24** It is Council policy to assess, as relevant, proposals for development in terms of, inter alia, potential impact on existing adjacent developments, existing land uses and/or the surrounding landscape. Where proposed developments would be likely to have a significant adverse effect on the amenities of the area through pollution by noise, fumes, odours, dust, grit or vibration, or cause pollution of air, water and/or soil, mitigation measures shall be introduced in order to eliminate adverse environmental impacts or reduce them to an acceptable operating level. Application of this policy will take into account instances whereby activities are licensed by other bodies through other processes (such as Integrated Pollution Control Licensing or Industrial Emissions Licensing).	**Chapter 5** of the EIAR identifies, describes and assesses the potential significant, direct and indirect effects of the Proposed Project on population and human health and has been completed in accordance with the guidance set out by the Environmental Protection Agency (EPA), in particular the '*Guidelines on the Information to be Contained in Environmental Impact Assessment Reports*' (EPA, 2022). **Chapter 5** concludes that potential for negative health effects associated with the Proposed Project is slight to imperceptible. Furthermore, the Proposed Wind Farm is capable of offsetting carbon emissions associated with the burning of fossil fuels. During the operational stage, the Proposed Wind Farm will have a long term, moderate positive effect on air quality which will contribute to positive effects on human health and assist in Ireland reaching its emissions targets and renewable energy goals.

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		Please refer to **Chapter 3** and **Chapter 5** of the EIAR for further details.
Economic Development	**ENTP-24** It is Council policy to actively encourage the redevelopment of sites with antecedent uses or disused sites which were formerly ESB plants and Bord na Móna works for enterprise and employment creation.	The Proposed Wind Farm is located on a post-industrial peatland site formally used for commercial peat extraction by BnM. The Proposed Wind Farm represents a future use which will generate employment in the renewable energy sector. As detailed in **Chapter 5** of the EIAR, there will be a positive, significant, short-term, direct effect on employment levels during the construction phase (estimated to be 24 months) and a positive, slight, short-term effect on investment and employment in the local and wider regions due to the contributions paid to the Offaly County Council at the commencement of the construction phase. Up to approximately 100-120 jobs are likely to be created during the construction phase of the Proposed Project.
	ENTP-45 It is Council policy to support the creation of quality green jobs which are sustainable over the longer-term.	As detailed in **Chapter 5** of the EIAR, the design, construction, operation and decommissioning of the Proposed Project will provide employment for technical consultants, contractors and maintenance staff. These are high quality jobs in a green industry. The Proposed Project is likely to create up to 100-120 jobs during the construction phase. The majority of construction workers will be sourced locally, thereby helping to sustain employment in the construction trade. Where appropriate, engineering fill and higher quality, surfacing granular fill and sand will be sourced from local, authorised quarries.
	ENTP-47 It is Council policy to support and promote the development of economic and enterprise development and activity in a manner which contributes	The Proposed Project is a significant investment in renewable energy infrastructure in Co. Offaly which directly contributes to the OCC's

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	to the transition to a low carbon, climate resilient and environmentally sustainable county.	aim to the transition to a low-carbon, climate-resilient and environmentally sustainable county.
	REDP-09 It is Council policy to facilitate the development of the rural economy through supporting sustainability and economic efficiency in agriculture and diversification into alternative on-farm and off-farm activities such as the food and drinks sector, forestry, horticulture, crafts, agri-business, fishing, aquaculture, waste management, rural tourism, renewable energy and the bio-economy, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism.	OCC supports the facilitation of the sustainable economic development such as renewable energy while maintaining and protecting the natural heritage and landscape. The Proposed Project has been designed with due regard for the natural heritage and the landscape, as demonstrated in **Chapter 6** and **Chapter 14**.
	REDP-11 As part of Offaly County Council's recognition of the contribution that rural areas make to social and economic wellbeing, it is Council policy to support and protect existing rural economies such as (i) valuable agricultural lands to ensure sustainable food supply, (ii) the value and character of the open countryside and (iii) the diversification of rural economies to create additional jobs and maximise opportunities in emerging sectors, such as agri-business, renewable energy, tourism, and forestry enterprise.	The Proposed Project will create employment in the renewable energy sector, helping to diversify the rural economy. As detailed in **Chapter 5** of the EIAR, the design, construction, operation and decommissioning of the Proposed Project will provide employment for technical consultants, contractors and maintenance staff. These are high quality jobs in a green industry. The Proposed Project is likely to create up to 100-120 jobs during the construction phase.
	REDP–17 It is Council policy to support the development of renewable energy in rural areas, where it is considered appropriate i.e. where it is demonstrated that such development would not result in significant environmental effects. Such development will be assessed on a case-by-case basis.	REDP-17 directly supports the Proposed Project which is a renewable energy project in a rural area. The findings of the EIAR and the mitigation measures set out within the documents demonstrates the Proposed Project will be capable of being constructed, operated and decommissioned without likely significant effects on the environment.
Biodiversity	**BLP-01** It is Council policy to protect, conserve, and seek to enhance the county's biodiversity and ecological connectivity.	The Proposed Project aligns with the aims of OCC in relation to the protection and conservation of biodiversity and ecological connectivity. **Chapter 6** of the EIAR concludes that provided that the Proposed Project is constructed and operated in accordance with the design, best practice and mitigation measures that are described within this application, significant individual or cumulative effects on ecology are not anticipated.

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	BLP-02 It is Council policy to conserve and protect habitats and species listed in the Annexes of the EU Habitats Directive (92/43/EEC) (as amended) and the Birds Directive (2009/147/EC), the Wildlife Acts 1976 (as amended) and the Flora Protection Orders.	The NIS provides an assessment of all potential direct or indirect adverse effects on European Sites. The NIS objectively concluded that the Proposed Project, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site.
	BLP-04 It is Council policy to protect and maintain the conservation value of all existing and future Natural Heritage Areas, proposed Natural Heritage Areas, Nature Reserves, Ramsar Sites, Wildfowl Sanctuaries and Biogenetic Reserves in the county.	The potential impact of the Proposed Project on NHAs, pNHAs and any other ecologically sensitive site are assessed with **Chapter 6** of the EIAR. **Chapter 6** concludes that provided that the Proposed Project is constructed and operated in accordance with the design, best practice and mitigation measures that are described within this application, significant individual or cumulative effects on ecology are not anticipated.
	BLP-05 It is Council policy to ensure that development does not have a significant adverse impact, incapable of satisfactory avoidance or mitigation, on plant, animal or bird species protected by law.	The EIAR assess all habitats and species protected by either Irish or European law. **Chapter 6** of the EIAR concludes that provided that the Proposed Project is constructed and operated in accordance with the design, best practice and mitigation measures that are described within this application, significant individual or cumulative effects on ecology are not anticipated. **Chapter 7** of the EIAR concludes that the Proposed Project will not result in any significant effects on any of the identified Key Ornithological Receptors (KORs). No significant effects on receptors of International, National or County Importance were identified. Provided that the Proposed Project is constructed, operated and decommissioned in accordance with the design, best practice mitigation and enhancement measures that are described within this application, significant individual or cumulative effects on the identified KORs are not anticipated.

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	BLO-01 It is an objective of the Council that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation and the sustainable management of County Offaly's natural capital.	As demonstrated by the findings of the EIAR and the mitigation measures set out within, the Proposed Project will be capable of being constructed, operated and decommissioned without likely significant effects on the environment.
	BLO-02 It is an objective of the Council that no plans, programmes or projects giving rise to significant cumulative, direct, indirect or secondary impacts on European sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan (either individually or in combination with other plans, programmes, etc. or projects).	Other plans and projects are cumulatively assessed with the Proposed Project in the Cumulative Impact Assessment section of each impact assessment chapter of the EIAR. The methodology for the identification of cumulative plans and projects is detail in **Chapter 2** of the EIAR. Cumulative plans and projects are also assessed in the NIS. The NIS concludes that there is no potential for the Proposed Project to contribute to any adverse cumulative effects on any European Sites was identified when considered in-combination with other plans and projects.
	BLO-03 It is an objective of the Council that all projects and plans arising from this Plan will be screened for the need to undertake Appropriate Assessment under Article 6 of the Habitats Directive. A plan or project will only be authorised after the competent authority has ascertained, based on scientific evidence, Screening for Appropriate Assessment, and subsequent Appropriate Assessment where necessary, that: 1. The plan or project will not give rise to significant adverse direct, indirect or secondary effects on the integrity of any European site (either individually or in combination with other plans or projects); or 2. The plan or project will have significant adverse effects on the integrity of any European site (that does not host a priority natural habitat type/and or a priority species) but there are no alternative solutions and	The impact of the Proposed Project on designated sites is considered in full in the NIS. The NIS objectively concluded that the Proposed Project, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site.

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	the plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of Natura 2000; or 3. The plan or project will have a significant adverse effect on the integrity of any European site (that hosts a natural habitat type and/or a priority species) but there are no alternative solutions and the plan or project must nevertheless be carried out for imperative reasons for overriding public interest, restricted to reasons of human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of Natura 2000.	
Lands, Soils and Geology	**BLP-09** It is Council policy to protect from inappropriate development and maintain the character, integrity and conservation value of features or areas of geological interest as contained in the scheduled list of geological heritage sites identified in Table 4.11 Offaly Geological Sites.	The Proposed Project is not located within a geological heritage site identified in Table 4.11 Offaly Geological Sites.
Hydrology and Hydrogeology	**ENVP-01** It is Council policy to ensure that the Water Framework Directive, the River Basin Management Plan and any subsequent Water Management Plans are fully considered throughout the planning process.	The Water Framework Directive and the River Basin Management Plant are fully considered in **Chapter 9** of the EIAR.
	ENVP-02 It is Council policy to manage, protect and enhance surface water and ground water quality to meet the requirements of the Water Framework Directive.	**Chapter 9** of the EIAR includes a Water Framework Directive (WFD) Compliance Assessment Report (see **Appendix 9-**3 of the EIAR). A full assessment of the potential effects of the Proposed Project on the status of the receiving waterbodies is included in the WFD Compliance Assessment Report.

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	ENVP-03 It is Council policy to support the implementation of the Water Framework Directive, the River Basin Management Plan and the Local Authority Waters Programme in achieving and maintaining at least good environmental status for all water bodies in the county. Development proposals shall not have an unacceptable impact on the water environment, including surface waters, groundwater quality and quantity, river corridors and associated woodlands.	**Chapter 9** of the EIAR provides a baseline assessment of the environmental setting of the Proposed Project site in terms of hydrology and hydrogeology and discusses the potential likely significant effects that the construction, operation and decommissioning of the Proposed Project will have. **Chapter 9** concludes that, with appropriate mitigation measures in place, no significant effects on the hydrological and hydrogeological environment are envisaged.
	WSP-22 It is Council policy to ensure adequate surface water drainage systems are in place which meet the requirements of the Water Framework Directive and the River Basin Management Plan and to promote the use of Sustainable Drainage Systems.	Surface water drainage measures are shown on the drainage drawings provided in the planning drawing pack and detailed within **Chapter 9** of the EIAR. With the surface water drainage mitigation measures in place, no significant effects on surface water or groundwater quality are envisaged. Please refer to **Chapter 9** of the EIAR for further details.
	ENVP-07 It is Council policy to protect groundwater sources through the implementation of the Groundwater Protection Scheme and Source Protection Zones. Development proposals within these zones which have the potential to pose a risk to groundwater will be required to demonstrate that no reasonable alternative site is available and that groundwater quality will be protected to the satisfaction of the Council.	The potential impacts of the Proposed Project on groundwater is assessed in **Chapter 9** of the EIAR.
Air Quality	**ENVP-17** It is Council policy to manage air quality in accordance with relevant legislation and policy.	**Chapter 10** of the EIAR identifies, describes and assesses the potential significant direct and indirect effects on air quality arising from the construction, operation and decommissioning of the Proposed Project. **Chapter 10** considers the Clean Air for Europe (CAFE) Directive (Directive 2008/50/EC on ambient air quality and cleaner air for Europe) (as amended by Directive EU 2015/1480) and the Air Quality Standards Regulations 2011 (S.I. No. 180 of 2011) as amended by the
	ENVP-18 It is Council policy to promote the preservation of best ambient air quality compatible with sustainable development in accordance with the EU ambient Air Quality and Cleaner Air for Europe (CAFE) Directive (2008/50/EC) and ensure that all air emissions associated with new developments are within	

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	Environmental Quality Standards as set out in the Air Quality Standards Regulations 2011, or any updated/superseding documents.	Air Quality Standards (Amendments) and Arsenic, Cadmium, Mercury, Nickel and Polycyclic Aromatic Hydrocarbons in Ambient Air Regulations, 2016 (S.I. 659 2016). **Chapter 10** concludes that the production of energy from wind turbines has no direct air emissions as is expected from fossil fuel-based power stations. Harnessing more energy by means of renewable sources will reduce dependency on fossil fuels, thereby resulting in a reduction in harmful emissions that can be damaging to human health and the environment. Some temporary or short-term indirect emissions associated with the construction of the Proposed Project will include vehicular and dust emissions. Please refer to **Chapter 10** of the EIAR for further details.
	ENVP-19 It is Council policy to require activities likely to give rise to air emissions to implement measures to control such emissions and to undertake air quality monitoring. Application of this policy will take into account instances whereby activities are licensed by other bodies through other processes (such as Integrated Pollution Control Licensing or Industrial Emissions Licensing).	**Chapter 10** of the EIAR identifies, describes and assesses the potential significant direct and indirect effects on air quality arising from the construction, operation and decommissioning of the Proposed Project. A Construction and Environmental Management Plan (CEMP) will be in place throughout the construction phase (see **Appendix 4-4** of the EIAR). The CEMP includes dust suppression measures. In addition, turbines and construction vehicles will be transported to the Site on specified haul routes only, which will be regularly inspected for cleanliness and cleaned, as necessary. Please refer to **Chapter 10** and **Appendix 4-4** of the EIAR for further details.
	ENVO-09 It is an objective of the Council to reduce harmful emissions and achieve and maintain good air quality for the county.	The Proposed Project will generate clean, renewable electricity, which will be integrated into the grid, helping to electrify and decarbonise

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	ENVO-10 It is an objective of the Council to actively promote measures to reduce air pollution and combat climate change including promotion of energy efficient buildings, cleaner home heating, green infrastructure, active and public transport modes, electric vehicles and innovative design solutions.	other sectors, therefore, reducing the reliance on greenhouse gas emitting fossil fuels and improving the sustainability and security of the national, regional and County energy system. **Chapter 10** and **Chapter 11** of the EIAR also concludes that there will be a net reduction in carbon dioxide (CO_2) emissions from the operation of the Proposed Project. By providing an alternative to electricity derived from coal, oil or gas-fired power stations, the Proposed Project will result in emission savings of carbon dioxide (CO_2), oxides of nitrogen (NO_x), and sulphur dioxide (SO_2). The production of renewable energy from the Proposed Project will have a Long-Term Moderate Positive effect on air quality due to the offsetting of approximately 56,375 tonnes of Carbon Dioxide (CO_2) per annum, or 1,973,125 tonnes of CO_2 over the proposed 35-year lifecycle of the Proposed Wind Farm. Please refer to **Chapter 10** and **Chapter 11** of the EIAR for further details.
Noise	**ENVP-21** It is Council policy to promote the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life. Planning permission will not normally be granted for new uses / development or extensions of existing uses that produce significant and unacceptable levels of noise and/or vibration at site boundaries or within adjacent noise sensitive areas, especially residential areas.	**Chapter 12** of the EIAR describes the assessment undertaken of the potential noise effects on local residential amenity from the Proposed Project. **Chapter 12** concludes that residual noise associated with the construction and decommissioning phases have been predicted to be not significant after consideration of impacts and duration, in line with the identified criteria. Based on detailed information on the site layout, turbine noise emission levels and turbine hub height, turbine noise levels have been predicted at noise sensitive locations (NSLs) for a range of operational wind speeds. The predicted noise levels associated with the Proposed Project will be within the best practice noise limits recommended in

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		the DoEHLG 2006 Guidelines. Therefore, it is not considered that a likely significant effect is associated with the Proposed Project. Operational noise from the proposed onsite 220kV substation has been assessed and found to be within the adopted criteria as set out in **Chapter 12** of the EIAR. Please refer to **Chapter 12** of the EIAR for further details.
Landscape and Visual	**BLP-38** It is Council policy to protect and enhance the county's landscape, by ensuring that development retains, protects and where necessary, enhances the appearance and character of the county's existing landscape.	An LVIA is presented in **Chapter 14** of the EIAR, and it assesses the likely significant landscape and visual impacts arising as a result of the Proposed Project. The LVIA determined that the Proposed Project is located within a landscape that can effectively accommodate a wind energy development of this scale. Only one 'Significant' residual effect occurs at one viewpoint location (VP11) as the turbines are in relatively close proximity (<1km) to residential receptors. However, the assessments have determined that the landscape of the Proposed Project site is a highly suitable environment capable of effectively accommodating the Proposed Project. Please refer to **Chapter 14** of the EIAR for further details.
	BLP-40 It is Council policy to ensure that consideration of landscape sensitivity is an important factor in determining development uses.	
	BLP-41 It is Council policy to require a Landscape/Visual Impact Assessment to accompany significant proposals, located within or adjacent to sensitive landscapes. This assessment will provide details of proposed mitigation measures to address likely negative impacts.	
	BLO-24 It is an objective of the Council to have regard to the Landscape Sensitivity Areas in Tables 4.18, 4.19 and 4.20 in the consideration of planning applications	The LVIA presented in **Chapter 14** of the EIAR takes consideration of potential impacts based on the designation of both landscape and visual sensitivity and discusses mitigation measures to mitigate any potential for significant landscape and visual effects, cognisant of the relevant policies and objectives set out in the OCDP. The proposed turbines are located within an area designated with Moderate Sensitivity in the OCDP. Cutaway bogs, which comprise the majority of this landscape type and where majority of the turbines are

Policy Theme	Policy/ Objective	Compliance
		located in are noted in the OCDP as appropriate for *"sensitively designed and located developments including renewable energy (**wind farms**)."* The Proposed Project site is not located within any protected landscape within any local landscape policy, and no sensitive landscape designations (Areas of High Amenity) fall within the Proposed Project site itself. Please refer to **Chapter 14** of the EIAR for further details.
Material Assets - Waste	**ENVP-10** It is Council policy to promote circular economy principles, prioritising prevention, reuse, recycling and recovery, and to sustainably manage residual waste. New developments will be expected to take account of the provisions of the Waste Management Plan for the Region and observe those elements of it that relate to waste prevention and minimisation, waste recycling facilities, and the capacity for source segregation.	A Resource Waste Management Plan (RWMP) has been prepared and forms part of the CEMP in **Appendix 4-4** of the EIAR. The RWMP outlines the methods of waste prevention and minimisation by recycling, recovery and reuse at each stage of construction of the Proposed Project. Disposal of waste will be a last resort. The RWMP has been produced in line with the following guidance '*Best Practice Guidelines for the Preparation of Resource & Waste Management Plans for Construction & Demolition Projects*' (EPA, 2021). Please refer to **Appendix 4-4** of the EIAR for further details.
	ENVP-11 It is Council policy to ensure that all waste disposal shall be undertaken in compliance with the requirements of the Environmental Protection Agency and relevant Waste Management Legislation.	
	ENVP-14 It is Council policy to require Construction and Environmental Management Plans (CEMPs) to be prepared for larger scale projects and this requirement shall be assessed on a case by case basis as part of the development management process. Where a CEMP is required, it shall be prepared in accordance with the criteria set out in Section 11.5.2 of this Plan.	A CEMP has been prepared for the Proposed Project and is included in **Appendix 4-4** of the EIAR. The CEMP includes details of drainage, peat and spoil management, and waste management, and clearly outlines the mitigation measures and monitoring proposals that are required to comply with the environmental commitments outlined in the EIAR. In the event that planning permission is granted for the Proposed Project, the CEMP will be updated prior to the commencement of the development, to

Policy Theme	Policy/ Objective	Compliance
		address the requirements of any relevant planning conditions, including any additional mitigation measures which are conditioned, and will be submitted to the Planning Authority for approval. Please refer to **Appendix 4-4** of the EIAR for further details.
Cultural Heritage	**BHP-37** It is Council policy that any development that may, due to its size, location or nature, have implications for archaeological heritage (including both sites and areas of archaeological potential / significance) shall be subject to an archaeological assessment. When dealing with proposals for development that would impact upon archaeological sites and/or features, there will be presumption in favour of the 'preservation in situ' of archaeological remains and settings, in accordance with Government policy. Where permission for such proposals is granted, the Planning Authority will require the developer to have the site works supervised by a licenced archaeologist.	**Chapter 13** of the EIAR presents the results of an archaeological, architectural and cultural heritage impact assessment of the construction, operation and decommissioning of the Proposed Project. The assessment concludes that no significant direct or indirect effects to the recorded cultural heritage resource as a result of the Proposed Project have been identified. Where potential direct effects to sub-surface archaeology have been identified appropriate mitigation measures are proposed in order to ameliorate this potential effect. Please refer to **Chapter 13** of the EIAR for further details. Furthermore, the Lemanaghan Monastic Site is identified in **Chapter 14** of the EIAR, which provides an impact assessment on the monastic site and concludes that there will be no significant residual effects on the landscape setting of the Monastic Site.
	BHO-05 It is an objective of the Council to protect archaeological sites and monuments, and archaeological objects, which are listed in the Record of Monuments and Places, and to seek their preservation in situ (or at a minimum, preservation by record) through the planning process	
	BHP-43 It is Council policy to support and promote the protection and appropriate management of all monastic sites in the county.	

Offaly County Development Plan 2021-2027 Wind Energy Strategy

The Wind Energy Strategy is an integral part of the OCDP, building upon previous strategies and incorporating updated legislation and policies. The OCDP 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.

The WES identifies key areas within the County that are designated as '*Areas Deemed Open for Consideration for Wind Energy Developments'* and '*Areas Not Deemed Suitable for Wind Energy Developments'*. Please refer to **Table 7-4** below for further details.

Table 7-4 Offaly County Development Plan 2021-2027 Wind Energy Strategy Designation Areas

Offaly County Council – Wind Energy Strategy Designation Areas	
Strategy Designation Areas	**Description**
Open for Consideration	**Areas Deemed Open for Consideration for Wind Energy Developments** 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. Notwithstanding this designation, wind farm developments in these areas will be evaluated on a case by case basis subject to criteria listed in Development Management Standard 109 contained in Chapter 13 of Volume 1 of the County Development Plan and the Section 28 Wind Energy Development Guidelines.
Not Deemed Suitable	**Areas Not Deemed Suitable for Wind Energy Developments** 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 the County Development Plan and the Section 28 Wind Energy Development Guidelines.

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 shown in **Figure 7-1** 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 as 'Areas Not Deemed Suitable for Wind Energy Developments'. A detailed site-specific constraints assessment has been undertaken as part of the design

process (refer to **Section 3.2.5.2** of **Chapter 3** of the EIAR) which demonstrates that this area of the Proposed Project site is a suitable location for a single wind turbine.

In the Draft OCDP 2021-2027, all Proposed Wind Farm turbines were located within the Open for Consideration wind energy zoning. During the public consultation period on the Draft OCDP, a third-party submission raised concerns about the suitability of Lemanaghan Bog for wind energy development. At material alteration stage, the OCC Chief Executive (CE) responded to the submission and stated the following:

"I am satisfied with the approach taken, comprehensiveness and robustness of the sieve mapping analysis in Section 5 and the Field Analysis and Desk Top Survey in Section 6 of the County Wind Energy Strategy in the Draft Plan, completed in line with the advice contained in Wind Energy Guidelines 2006 (Section 3.5) and the Draft Revised Wind Energy Development Guidelines 2019 (Section 3.6), which designated this area 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."*

It is then noted in the CE report that "*the members passed a motion at the Special Council Meeting considering the Chief Executives Report on the Draft Plan 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. In addition, this motion amended the description of Area 5 in the County Wind Energy Strategy to read as follows; "Area generally west of Doon and north east of Ferbane.".*

With the rationale behind the wind energy zoning considered to be the presence of the St. Manchan's well monastic site, the potential impacts on the monastic site have been taken into account in the EIAR. 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** of the EIAR, 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** of the EIAR, 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 refer to EIAR **Volume 2: Photomontage Booklet**, VP12 to VP14, for further visual detail of the Proposed Wind Farm and effects on the Lemanaghan Monastic Site.

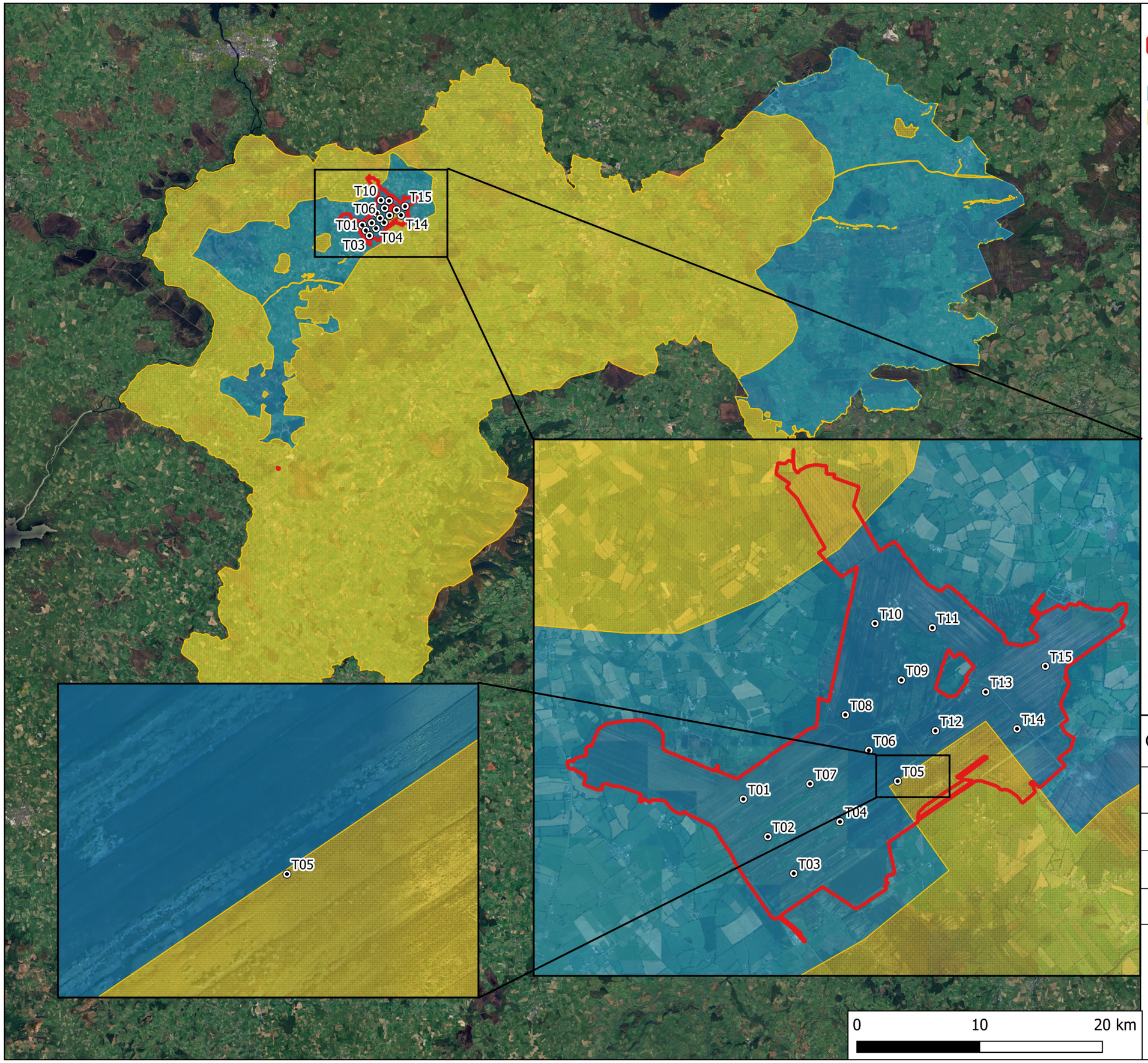
It is considered that the proposed location of T05 does not represent a material contravention of the OCDP. The basis for this consideration takes the following points into account:

- The rationale for the wind energy zoning in this area and the findings of the EIAR, in particular the conclusions of the **Chapter 13** and **Chapter 14**.
- The fact that T05 is located only 1.9m from the OTC area (centre point of the turbine to boundary of Open for Consideration area).

As such, it is considered that the location of T05 does not represent a material contravention of the OCDP. Furthermore, as detailed in **Table 7-3** above, it has been demonstrated that the Proposed Project aligns with the relevant policies and objectives of the OCDP and a statement of compliance with each of the Development Management Standards as set out in Chapter 13 of the OCDP has been provided in **Table 7-5** below. Please refer to in **Table 7-3** and **Table 7-5** for further details.

Development Management Requirements

Section 13.9.13 Energy and Communications of Chapter 13 of the OCDP sets out the Development Management Standards that the Planning Authority may consider when considering applications for wind energy developments such as the Proposed Project. The Proposed Project is assessed against each of the requirements as set out in **Table 7-5** below.



Map Legend

- Planning Application Boundary
- Turbine Layout
- Areas Open For Consideration
- Areas Not Deemed Suitable For Wind Energy

Drawing Title
Offaly County Council WindStrategy Areas Map

Project Title
Lemanaghan Wind Farm, Co. Offaly

Drawn By	Checked By
CJ	EC
Project No. 200804	Drawing No. Figure 7-1
Scale 1:300,000	Date 2026-03-09

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Table 7-5 Offaly County Development Plan 2021-2027 Wind Energy Development Management Standards

Local considerations taken into account by the Council	Compliance
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.	In relation to set back distances as set out in the DoEHLG 2006 Guidelines, **Chapter 5** of the EIAR states that the closest residential sensitive receptor is located approximately 896 m from the nearest proposed turbine (T10), i.e., above both the minimum recommended setback for properties involved in the project (500m) and the recommended 4 times the maximum tip height setback (880 m) from properties not involved in the Proposed Project (as recommended in the Draft DoHPLG 2019 Guidelines). The turbine locations thus adhere to the DoEHLG 2006 Guidelines and Draft DoHPLG 2019 Guidelines in relation to turbine setback: a minimum 500m set back from sensitive receptors and a minimum setback of four times the tip height of the proposed turbines. In relation to noise and shadow flicker, **Chapter 5** of the EIAR states that detailed noise and shadow flicker modelling have been carried out as part of the EIAR, which shows that the Proposed Wind Farm will be capable of meeting all required guidelines in relation to noise thresholds and the shadow flicker thresholds set out in the DoEHLG 2006 Guidelines or Draft DoHPLG 2019 Guidelines if adopted. In terms of location, spatial extent, spacing and layout, **Chapter 14** of the EIAR states that the siting and design of the Proposed Project adheres to the guidance for the siting of wind farms in Flat Peatland Landscapes as set out in the DoEHLG 2006 Guidelines and the Draft DoHPLG 2019 Guidelines. Please refer to **Chapter 5**, **Chapter 12** and **Chapter 14** of the EIAR for further details.
› 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.	As shown in **Figure 7-1** above 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 as 'Areas Not Deemed Suitable for Wind Energy Developments'. 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'. As noted in the OCC's Chief Executive's Report on the Material Alteration Consultation Stage of the OCDP (August 2021), the decision to exclude this area of the site from 'Areas Deemed Open for Consideration for Wind Energy Developments' is 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** of the EIAR, 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** of the EIAR, which provides an impact assessment on the monastic site and concludes that there will be no significant residual effects on the landscape setting of the Monastic Site. Please refer to **Chapter 13** and **Chapter 14** of the EIAR for further details.
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.	The LVIA presented in **Chapter 14** of the EIAR assesses the likely significant effects of the Proposed Project on landscape and visual amenity. The LVIA was informed by desktop studies and receptor mapping, site visits, verified photomontages, and an impact assessment methodology which follows best practice guidance for LVIA. The LVIA also includes assessment of cumulative landscape and visual effects. Onsite visibility appraisals, ZTV mapping, a Route Screening Analysis and photomontage viewpoint locations determined that visibility of the proposed turbines will be very limited from locations beyond 5km from the Proposed Project site. The LVIA concludes that the Proposed Project is located within a landscape that can effectively accommodate a wind energy development of this scale. Only one 'Significant' residual effect occurs at one viewpoint location (VP11) as the turbines are in relatively close proximity (<1km) to residential receptors. However, it should be noted that the turbine locations adhere to the DoEHLG 2006 Guidelines and Draft DoHPLG 2019 Guidelines in relation to turbine setback: a minimum 500 m set back from sensitive receptors and a minimum setback of four times the tip height of the proposed turbines. The assessments have determined that the landscape of the Proposed Project site is a highly suitable environment capable of effectively accommodating the Proposed Project. Please refer to **Chapter 14** of the EIAR for further details.
› Impact on the residential amenities of the area.	When considering the amenity of residents in the context of a Proposed Project, there are three main potential impacts of relevance: 1) Shadow Flicker, 2) Noise, and 3) Visual Amenity. Shadow flicker and noise are quantifiable aspects of residential amenity while visual amenity is more subjective. Please refer to the other compliance statements in this Table for further details on residential amenity with regard to Shadow Flicker, Noise and Visual Amenity. Please also refer to **Chapter 5**, **Chapter 12** and **Chapter 14** of the EIAR for further details.

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.	The layout of the Proposed Project has been designed to minimise the potential environmental effects, while at the same time maximising the energy yield from the wind resource passing over the Proposed Project site. Constraint studies, as described in **Chapter 3** of the EIAR, have been carried out to ensure that turbines and all ancillary infrastructure are located in the most appropriate areas of the site. The final design of the Proposed Wind Farm takes account of all site constraints and the distances to be maintained between turbines and from houses, roads, etc. The layout is based on the results of all site investigations that have been carried out during the EIAR process and the EIA scoping process with statutory and non-statutory consultees. As information regarding the Proposed Project was compiled and assessed, the number of turbines and the proposed layout have been revised and amended to take account of the physical constraints of the Proposed Project site and the requirement for buffer zones and other areas which should be avoided. The selection of the number of turbines and layout of same also had regard to wind-take and the separation distance to be maintained between turbines, as well as landscape and visual, cultural heritage, noise and shadow flicker impacts. The EIAR and Proposed Project design process was an iterative process, where findings at each stage of the assessment were used to further refine the design, always with the intention of minimising the potential for environmental impacts. Please refer to **Chapter 3** and **Chapter 4** of the EIAR for further details.
› 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.	**Chapter 14** of the EIAR includes a Landscape and Visual Impact Assessment and addresses the potential visual impact of the Proposed Project. The Lemanaghan Monastic Site is the closest sensitive receptor to the Proposed Project (apart from residential receptors); however, as discussed throughout **Chapter 13** and **Chapter 14** and accompanying appendices, notably **Appendix 13-5**, the Proposed Project will not alter the physical fabric or key features of the monuments, and any change will occur only to the wider landscape setting. Furthermore, the Proposed Wind Farm is set back beyond the buffer specifically created to mitigate impacts on the Lemanaghan Monastic Site as set out in local planning policy through the 2021 amended Wind Energy Zoning (as per the Chief Executive's Report), with the exception of turbine T05, which is located on the boundary of an area designated 'not Deemed Suitable for Wind Energy Developments'. Overall, as discussed in **Chapter 14** of the EIAR, the proposed turbines are seen beyond the immediate visual context of the Monastic Site, with the residual visual effects deemed to be 'Moderate' in VP12 and VP13 and 'Slight' in VP14. Please refer to **Chapter 14** of the EIAR and EIAR Volume 2: Photomontage Booklet for further details.
› Impact on nature conservation, ecology, soil, hydrology, groundwater, archaeology, built heritage and public rights of way.	**Chapter 6** of the EIAR assesses the likely significant effects that the Proposed Project may have on Biodiversity, Flora and Fauna. Following consideration of the residual effects (post mitigation) it is concluded that the Proposed Project will not result in any significant effects on any of the identified Key Ecological Receptors (KER). No significant effects on receptors of international, national or local importance were identified.

	Chapter 7 of the EIAR assesses the likely significant effects that the Proposed Project may have on avian receptors. Following consideration of the residual effects (post-mitigation), it is concluded that the Proposed Project will not result in any significant effects on any of the identified Key Ornithological Receptors (KOR). No significant effects on receptors of international, national or local importance were identified. **Chapter 8** of the EIAR, prepared by Hydro-Environmental Services (HES) assess the likely significant effects that the Proposed Project may have on land, soils and geology. **Chapter 8** concludes that Proposed Project has a very small development footprint when compared to the overall area of the Proposed Project site (approx. 3%). Therefore, no significant effects on land will occur during the construction, operation or decommissioning phases of the Proposed Project. Furthermore, with the implementation of the mitigation measures detailed in the Chapter, and the best practice measures detailed in the Peat and Spoil Management Plan (**Appendix 4-3** of the EIAR), no significant effects on peat and soils or on the underlying limestone bedrock geology will occur during the construction, operation or decommissioning phases of the Proposed Project. **Chapter 9** of the EIAR, prepared by HES, assesses the likely significant effects that the Proposed Project may have on hydrology and hydrogeology. **Chapter 9** concludes that No significant impacts to surface water (quality and flows) and groundwater (quality and quantity, and any local groundwater wells) will occur as a result of the Proposed Project provided the proposed mitigation measures are implemented. Furthermore, a hydrological assessment of potential impacts on local designated sites was undertaken. The River Shannon Callows Special Area of Conservation (SAC)/proposed Natural Heritage Area (pNHA) (Site Code: 000216) and the Middle Shannon Callows Special Protection Area (SPA) (Site Code: 004096) are considered to be hydrologically connected to the Proposed Project site. Following implementation of the appropriate mitigation measures as outlined in the EIAR no significant impacts on this designated site will occur as a result of the Proposed Project. **Chapter 13** of the EIAR, prepared by Tobar Archaeological Services Ltd. presents the results of an archaeological, architectural and cultural heritage impact assessment of the Proposed Project. **Chapter 13** concludes that no significant direct or indirect effects to the recorded cultural heritage resource as a result of the Proposed Project have been identified. Where potential direct effects to sub-surface archaeology have been identified appropriate mitigation measures are proposed in order to ameliorate this potential effect. Please refer to the **NIS** and **Chapter 6**, **Chapter 7**, **Chapter 8**, **Chapter 9** and **Chapter 13** of the EIAR for further details.
› Impact on ground conditions and geology.	**Chapter 8** of the EIAR, prepared by HES assess the likely significant effects that the Proposed Project may have on land, soils and geology. **Chapter 8** concludes that Proposed Project has a very small development footprint when

	compared to the overall area of the Proposed Project site (approx. 3%). Therefore, no significant effects on land will occur during the construction, operation or decommissioning phases of the Proposed Project. Furthermore, with the implementation of the mitigation measures detailed in the Chapter, and the best practice measures detailed in the Peat and Spoil Management Plan (**Appendix 4-3** of the EIAR), no significant effects on peat and soils or on the underlying limestone bedrock geology will occur during the construction, operation or decommissioning phases of the Proposed Project. Please refer to **Chapter 8** of the EIAR for further details.
› Consideration of falling distance plus an additional flashover distance from wind turbines to overhead transmission lines.	The layout of the Proposed Project has been designed to minimise the potential environmental effects, while at the same time maximising the energy yield from the wind resource passing over the Proposed Project site. Constraint studies, as described in **Section 3.2.5.2.1** of **Chapter 3** of the EIAR, have been carried out to ensure that turbines and all ancillary infrastructure are located in the most appropriate areas of the site. The proposed wind turbine layout has been optimised using wind farm design software (a combination of WAsP [wind resource assessment software]) and WindPro [Computational Fluid Dynamics and WindFarmer]) to maximise the energy yield from the Proposed Project site, while maintaining sufficient distances between the proposed turbines to ensure turbulence and wake effects do not compromise turbine performance and maintain the minimum setbacks from neighbouring properties as set out in the 2006 Guidelines and the Draft 2019 Guidelines). The final design of the Proposed Wind Farm takes account of all site constraints and the distances to be maintained between turbines and from houses, roads, etc. The layout is based on the results of all site investigations that have been carried out during the EIAR process and the EIA scoping process with statutory and non-statutory consultees. As information regarding the Proposed Project was compiled and assessed, the number of turbines and the proposed layout have been revised and amended to take account of the physical constraints of the Proposed Project site and the requirement for buffer zones and other areas which should be avoided. Please refer to **Chapter 3** and **Chapter 4** of the EIAR for further details.
› Impact of development on the road network in the area.	**Chapter 15** of the EIAR assesses the likely significant effects of the Proposed Project on traffic and transport. During the 24-month construction stage of the Proposed Project, it is forecasted that the additional traffic that will appear on the public road network serving the Proposed Wind Farm and during the construction of the Proposed Grid Connection will have a short-term, slight, negative effect on existing road users. There will be no significant impacts following the implementation of the proposed mitigation. During the operational phase, traffic impact of the Proposed Project will be imperceptible, long term and negative following mitigation. There will be no significant impacts.

	Please refer to **Chapter 15** of the EIAR for further details.
› Impact of the development on radio observatories and broadcast communications in the area.	**Chapter 15** of the EIAR assesses the likely significant effects of the Proposed Project on telecommunications. The Proposed Project will have no residual effects on the telecommunications signals due to the achieved setbacks from links in the area. Ai Bridges was engaged to carry out a Telecommunications Impact Assessment for the Proposed Project, which is included as **Appendix 15-6** (all telecommunications) and **Appendix 15-7** (Irish Rail) and no potential for impacts on telecommunications was identified. Please refer to **Chapter 15** of the EIAR for further details.
› Impact on human health in relation to noise disturbance (including consistency with the Word Health Organisations 2018 Environmental Noise Guidelines for the European Region), shadow flicker and air quality.	**Chapter 5** of the EIAR identifies, describes and assesses the potential significant, direct and indirect effects of Proposed Project on population and human health. The Word Health Organisations 2018 Environmental Noise Guidelines for the European Region influenced the preparation of the Chapter, among other guideline, plans and reports as set out in the EIAR. In relation to noise and shadow flicker, **Chapter 5** states that detailed noise and shadow flicker modelling have been carried out as part of the EIAR, which shows that the Proposed Wind Farm will be capable of meeting all required guidelines in relation to noise thresholds and the shadow flicker thresholds set out in the DoEHLG 2006 Guidelines or Draft DoHPLG 2019 Guidelines if adopted. In relation to air quality, **Chapter 5** states that the assessment concludes that there will long-term, imperceptible, negative effects, which are Not Significant, from dust and other emissions to air due to the operational phase of Proposed Project. Please refer to **Chapter 5**, **Chapter 12** and **Chapter 10** of the EIAR for further details.

8. PLANNING ASSESSMENT

The Proposed Project has been subject to a rigorous design process informed by a comprehensive planning and environmental assessments and surveys, which have collectively concluded that the proposal is in line with proper planning and sustainable development of the area. The Proposed Project has been designed in compliance with the DoEHLG 2006 Guidelines and it has been demonstrated that the requirements of the Draft DoHPLG 2019 Guidelines can also be achieved. There are no significant environmental impacts associated with the Proposed Project with the exception of a residual 'Significant' effect identified in **Chapter 14** of the EIAR, which occurred at 1 no. viewpoint location (VP11) as the turbines are in relatively close proximity (<1km) to residential receptors. In all instances, the Proposed Project exceeds the recommended 500m set back distance in the DoEHLG 2006 Guidelines and also is in line with the 4 times tip height set-back distance (in this case 880m) set out for residential visual amenity prescribed by the Draft DoHPLG 2019 Guidelines. The Proposed Project will not have any significant effects on any European Sites.

8.1 Strategic Need for the Proposed Project

The global climate is breaking down as a result of greenhouse gas emissions from the burning of fossil fuels. News stories of climate change-related extreme weather events are now a constant in the daily news cycle. According to the World Meteorological Organisation's '*State of the Global Climate 2025'* published in March 2026[8], atmospheric concentration of CO_2 in 2024 reached the highest levels in the last 2,000,000 years, and methane and nitrous oxide reached their highest levels in the last 800,000 years. The annual carbon dioxide concentration increase in 2024 was the largest increase since 1957, when modern measurements began. The report also states that the year 2024 was the warmest year on observational record, with temperatures at 1.55 °C ± 0.13 °C above the 1850–1900 average.[9]. The year 2025 was the second or third warmest year (depending on the datasets used) in the 176-year record[10].

The European State of the Climate Report 2024 produced by World Meteorological Organisation and European Union[11] reported 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 CO2 (+2.4 ppm) and methane (+12 ppb) has been observed since 2020.
- Glaciers in Scandinavia and Svalbard recorded the highest annual rates of mass loss.
- In 2024, Europe experiences the most widespread flooding since 2013.

The impacts of climate change are currently being felt, the severity of which is expected to increase with further greenhouse gas emissions. Ireland's Climate 2024 Provisional Summary Report produced by Met Éireann[12], reflects clear and distinct impacts arising from climate change in Ireland:

- 2024 was noted to be the fourth warmest year on record in Ireland with an average temperature of 10.72°C.
- Further precipitation changes are expected, with a 9% potential decrease in the summer, causing water shortages and impacting agriculture, and a 24% potential increase in winter, elevating the risk of flooding in various regions.
- Seven named storms impacted Ireland in 2024, with Storms Isha and Darragh both producing particularly violent storm-force winds.

To mitigate climate change, Ireland must decarbonise its economy by 2050. There is an urgency to ensure that real changes occur without delay, which means that a gradual shift towards increasing Ireland's

[8] *State of the Global Climate 2025 (World Meteorological Organisation, March 2026)*
[9] *State of the Global Climate 2025 (World Meteorological Organisation, March 2026)*
[10] *State of the Global Climate 2025 (World Meteorological Organisation, March 2026)*
[11] *The European State of the Climate Report 2024 (World Meteorological Organization and European Union, April 2025)*
[12] *Ireland's Climate 2024 Provisional Summary Report (Met Éireann, March 2025)*

use of renewable energy generation is no longer viable. Over the last 25 years, Ireland has become a world leader in onshore wind energy, with a total of 41.8%% of the Ireland's gross electricity supply from onshore wind in 2024[13]. As a country, Ireland only became a world leader by consenting and building one wind farm at a time.

Since 1992, Ireland has installed 5,000 MW of onshore wind. Now, with the 2025 Climate Action Plan requiring the amount of onshore wind energy to increase from 5,000 MW to 9,000 MW by 2030, Ireland must install almost double its existing capacity in just under 5 years. To reach this target, hundreds of additional wind farms will have to be connected to the national grid over the rest of this decade. The scale of Ireland's challenge was quantified in the 2024 Climate Action Plan, which states that *'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).

The latest climate and energy reports all make one message abundantly clear; Ireland is not acting fast enough. If a major step up in renewable energy deployment levels does not occur, Ireland will fail to reach its renewable energy target and will exceed its carbon budgets. The EPA report *Ireland's Greenhouse Gas Emissions Projections 2024-2055* (May 2025) highlights that Ireland is not on track to meet its national target of 51% emissions reduction target by 2030 compared to 2018 as required under the Climate Act, nor is the country projected to meet its EU target of 42% emissions reduction compared to 2005 under the Effort Sharing Regulations. Similarly, the Climate Change Advisory Council make clear that *'progress to reduce emissions is not sufficient for Ireland to meet its national and EU climate obligations'*[14]*.*

As a nation, Ireland is legally bound to its climate targets. 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. Section 15(1) of the Climate Act requires public bodies (including the planning authorities) to carry out its functions consistently, insofar as practicable, with specified climate plans and objectives, including the latest, which includes CAP25.

Ireland is also legally bound by renewable energy targets at a European level. The latest revision of the Renewable Energy Directive (RED III) introduced a binding EU-wide target for overall Renewable Energy Share (RES) of at least 42.5% by 2030 and requires Member States to set their national contributions to the EU-wide target. In accordance with RED III and the revised RES target, the Department of the Environment, Climate and Communications have published an updated National Energy and Climate Plan 2021-2030 in July 2024. The updated NECP committed to achieving a 43% share of renewable energy in total energy consumption by 2030. The updated NECP states that Ireland's proposed trajectory will not be in line with the desired trajectory set out in the Governance Regulation (Regulation 2018/1999).

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.

8.2 Compliance with Planning Policy

The provision of renewable energy developments such as the Proposed Project is strongly supported by European, national, regional and local policies and guidelines aimed at achieving the transition to a low carbon and climate resilient economy, increasing renewable energy generation, and enhancing energy security. Specifically, the Proposed Project will contribute to achieving the target of generating 9GW of electricity from onshore wind and reducing greenhouse gas emissions by 80% by 2030 as set out in the CAP25. The comprehensive suite of European, national, regional and local policy support for wind energy, demonstrates that the principle of the Proposed Project at this location is acceptable and suitable for wind energy development.

[13] *https://www.seai.ie/sites/default/files/publications/Energy-in-Ireland-2025.pdf*
[14] *https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR-2024-SfA-final.pdf*

At a European level, the Proposed Project will support Ireland in reaching its legally binding obligations as an EU Member State of achieving at least 42.5% renewable energy by 2030, as set out in REDIII. Furthermore, the RePowerEU plan aims to increase energy security within the EU and increase the share of renewable energy onto the EU electricity grid by *'Speeding up renewables permitting to minimise the time for roll-out of renewable projects and grid infrastructure improvements'*.

The Proposed Project aligns with National Strategic Outcome 8 and Objectives outlined in the Revised NPF, particularly Objective 70, which 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 contribute to the substantial Regional Renewable Electricity Capacity Allocation for the Eastern and Midland Region (1,966MW). The location of the Proposed Project on a post-industrial peatland site is fully aligned with the Revised NPF's focus on the development of renewable energy on the extensive tracts of publicly owned peat extraction areas in the Eastern and Midland Region.

Regionally, the Proposed Project will support the future growth of renewable energy technology in the Eastern and Midland Region as called for in the RSES which sets a clear precedent to identify and capitalise on those opportunities associated with the transition to renewable energy generation.

Locally, the OCDP is supportive of the Proposed Project as it sets out the need for Offaly to transition to a low-carbon and climate-resilient County with a focus on renewable energy to increase the County's energy sustainability and security. Specifically, a strategic aim of the OCDP is to transition to a competitive, low-carbon, climate-resilient and environmentally sustainable economy, the Proposed Project will support the OCDP in this aim. Compliance with all relevant policies within the OCDP is demonstrated in **Table 7-3** above.

In summary, the Proposed Project provides the opportunity to significantly contribute to energy and climate targets in a manner which is in accordance with planning policy at all levels.

8.3 Compliance with Legislation

This planning application has been prepared in accordance with Section 37 of the Planning Act. Pre-application consultation with ACP was undertaken in accordance with Section 37A and the application has been prepared in accordance with the requirements for an application under Section 37E, including the requirements under REDIII.

The Proposed Project is also consistent with the Climate Act and the legal requirement for the State to achieve a 51% reduction in emissions by 2030.

The application for development permission is accompanied by an EIAR and NIS in accordance with the requirements of the Planning Act and the Planning and Development Regulations 2001, as amended.

8.4 EIAR Findings

The purpose of the EIAR is to document the current state of the environment on and in the vicinity of the Proposed Project site and to determine the likely significant effects of the Proposed Project on the environment and where mitigation measures may be required.

The findings of the EIAR and the mitigation measures set out within the documents demonstrates the Proposed Project will be capable of being constructed, operated and decommissioned without likely significant effects on the environment generally. One 'Significant' effect is identified in **Chapter 14** of the EIAR, which occurred at 1 no. viewpoint location (VP11) as the turbines are in relatively close proximity (<1km) to residential receptors. It should be noted that in all instances, the Proposed Project exceeds the recommended 500m set back distance in the DoEHLG 2006 Guidelines and also is in line with the 4 times tip height set-back distance (in this case 880m) set out for residential visual amenity prescribed by the Draft DoHPLG 2019 Guidelines.

8.5 NIS Findings

This NIS has assessed the impacts of the construction, operation and maintenance and decommissioning of the Proposed Project on European Sites and their relevant Qualifying Interests to determine whether the Proposed Project will have an adverse effect on the integrity of European Sites, either alone or in combination with other plans or projects and in light of the conservation objectives of the sites. The assessment concluded that there will be no adverse effect on the integrity of any European site, either as a result of the Project alone or in combination with other plans or projects, provided that the mitigation listed is adhered to.

Therefore, it can be objectively concluded, following an examination, analysis and evaluation of the relevant information, including in particular the nature of predicted impacts, that the Proposed Project, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site in light of its conservation objectives and best scientific information, and there is no reasonable scientific doubt in relation to this conclusion.

8.6 Principle of Development

There exists a comprehensive platform of policy support for wind energy at a European, national, regional and local level that supports the principle of renewable energy development at the site to be acceptable at this location.

The Proposed Project is in accordance with and has the support of European, national, regional policies pertaining to achieving the transition to a low-carbon economy, climate resiliency, increasing renewable energy generation, and enhancing energy security.

At a local level, the Proposed Project is in line with the OCDP, as it identifies the need for Offaly to transition into a low-carbon and climate-resilient County. The Proposed Project will contribute to a strategic aim of the OCDP to transition to a competitive, low carbon, climate resilient and environmentally sustainable economy. The Proposed Project is located on a suitable site, the vast majority of which is designated as 'Open to Consideration' for wind energy development. T05 is located on the boundary of where the wind energy designation changes from 'Open to Consideration' to an area 'Not Deemed Suitable' to wind energy development. The location of this turbine is not considered to be a material contravention of the OCDP due to the fact that T05 is located a mere 1.9m from the 'Open to Consideration' area and the findings of the EIAR, in particular the conclusions of the **Chapter 13** and **Chapter 14**.

As concluded in the EIAR and outlined in **Section 8.4** above, the Proposed Project has been thoroughly assessed and with the mitigation measures outlined in the EIAR in place the Proposed Project will be capable of being constructed, operated and decommissioned without likely significant effects on the environment generally.

Similarly, as concluded in the NIS and outlined **in Section 8.5** above, all potential effects arising from the Proposed Project have been mitigated to the extent that there is no potential for adverse effects on the integrity of any European Site, as a result of the Proposed Project.

As such the principle of development is considered to be acceptable and in accordance with proper planning and sustainable development.

9. CONCLUSION

The provision of the Proposed Project is strongly supported by European, national, regional and local policies and guidelines aimed at achieving the transition to a low-carbon and climate-resilient economy, increasing renewable energy generation, and enhancing energy security. Specifically, the Proposed Project will contribute to achieving the target of generating 9GW of electricity from onshore wind and reducing greenhouse gas emissions by 80% by 2030 as set out in the CAP25.

The Proposed Project aligns with National Strategic Outcome 8 and Objectives outlined in the Revised NPF, particularly Objective 70, which 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.

CAP25 highlights 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*". To achieve this, greater alignment between local plans and national and regional renewable energy policy and targets is urgently required. If permitted, the Proposed Project will add approximately 90MW of renewable, clean energy to Ireland's national wind energy capacity. This will not only contribute to the decarbonisation of the electricity sector but will play a role in the decarbonisation of other sectors and the transition to a low-carbon, climate-resilient economy. By harnessing indigenous wind resources and generating and providing renewable onshore wind energy, the Proposed Project will enhance Ireland's energy security by reducing reliance on imported fossil fuels.

It is acknowledged that, as a significant infrastructure project, the Proposed Project will have an impact on the receiving environment in which it is proposed. The application for the Proposed Project recognises the parallel interests of tackling climate change while aiming to safeguard residential amenity and to protect species and habitats. Consideration of this fact has been central to the design of the Proposed Project and in the preparation of the EIAR, NIS, and mitigation measures proposed. The EIAR demonstrates that, if consented, the Proposed Project will be capable of being constructed, operated and decommissioned without giving rise to any significant impacts on the environment generally.

Ultimately, it is considered that this Proposed Project is in accordance with the provisions of proper planning and sustainable development and due to the suitability of the site and the urgent need for renewable energy development of this scale. National climate and renewable energy objectives, and the decarbonisation of Irish society as a whole is dependent on the rapid expansion of wind energy in Ireland. The scale of the challenge Ireland faces in decarbonising its economy is enormous, but the climate change implications of not doing so are even greater. The Proposed Project will support the decarbonisation of the electricity sector and the decarbonisation of other sectors, reducing reliance on imported fossil fuels for energy generation and enhancing Ireland's energy security.

Having regard to the key points set out in this Report, it is respectfully requested that ACP considers the relevant planning context that applies, and grants permission for the Proposed Project which is the subject of this application.