Strategic Infrastructure Development Section,
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Our Ref: 250708
Your Ref: 310143-21

19th December 2025

Re: ACP Ref. 310143-21: Strategic Infrastructure Development – Second Pre-Application Consultation Relating to the Proposed Wind Energy Development and Associated Works at Ballydermot (and other townlands), County Offaly and County Kildare.

Dear Sir/Madam,

On behalf of our Client, Bord Na Móna Powergen Ltd ('the Prospective Applicant'), MKO is seeking a second meeting with An Coimisiún Pleanála ('the Commission'), following our initial meeting on the 26th July 2021 in relation to the Strategic Infrastructure Development (SID) status, or otherwise, of the proposed wind energy development and associated works at Ballydermot (and other townlands) County Offaly and the townland of Lullybeg (and other townlands) Co. Kildare ('the Proposed Project'). The purpose of this meeting is to update the Commission on the environmental surveys and assessments undertaken since July 2021, present the final design of the Proposed Project, and discuss recent changes to planning legislation and policy.

Development Description

The Proposed Project site is located approximately 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village. The Proposed Project will be located on part of the Allen Bog Group which comprises 14 no. bogs, approx. 5580 ha. and is located on the border of County Offaly and County Kildare. The bogs include: Ticknevin, Glashabaun North, Glashabaun South, Codd 1, Codd 2, Ballydermot North, Ballydermot South, Blackriver, Lullymore, Lullybeg, Barnaran, Killina, Derrybrennan and Lodge.

At the time of the first consultation in July 2021, it was anticipated that 50–55 no. turbines could be accommodated on the site and within the landscape setting, however, following further assessment and design refinement, the Proposed Project now comprises 47 no. turbines. The Proposed Project also includes the construction of associated foundations and hard-standing areas, meteorological masts, access roads, temporary construction compounds, underground cabling, grid connection cabling, an onsite 220kv substation, an offsite 220kV substation, peat deposition areas, site drainage, biodiversity mitigation and enhancement areas, amenity tracks and carparks, and ancillary works and apparatus.

The layout of on-site infrastructure has been designed to account for site-specific constraints. An updated site layout for the proposed Ballydermot Wind Farm is included with this consultation request (see enclosed). The current design for the proposed grid connection includes an onsite 220kV

Substation on Lodge Bog on the east of the site connecting to a new offsite 220kV substation in the townland of Killybegs, south of Prosperous, Co. Kildare. An underground grid cable is proposed from the proposed onsite 220kV substation to the proposed offsite 220kV substation. The underground grid cable will measure approx. 11.5km in length and will be located in the public road corridor, primarily in the R414 and the R403.

Renewable Energy Directive (RED) III

On 7th 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. Section 9 of the European Union (Planning and Development) (Renewable Energy) Regulations 2025 provides that for RED III applications, The relevant authority shall acknowledge the completeness of the application within 45 days. The 'completeness check' inputs are set out in the European Union (Planning and Development) (Renewable Energy) Regulations 2025 Circular (CEPP 1/2025) and Renewable Energy Directive (RED) III Information Guide published by An Coimisiún Pleanála.

It is noted that, in accordance with subsection 37B(3) (b) and (c), the Commission may give advice regarding the completeness check and the information and documentation required to facilitate the completeness check process. Any advice in this regard, or in relation to the other RED III provisions, would be welcomed during the pre-application process.

Planning Policy Context

The study area is located within the functional areas of both Kildare County Council and Offaly County Council. At the time of the first pre-application consultation in July 2021, the Proposed Project was considered under the operative Offaly County Development Plan 2014–2020 and Kildare County Development Plan 2017–2023, while also having regard to the draft development plans for both counties. Since the adoption of the new County Development Plans, the Proposed Project has been assessed in line with the provisions of both the Offaly County Development Plan 2021-2027 and the Kildare County Development Plan 2023-2029.

Offaly County Development Plan 2021-2027

The Offaly County Development Plan 2021-2027 (CDP) is the principal policy instrument used to manage change in land use in the County. The CDP sets out the Planning Authority's strategic land use objectives and policies for the overall development of the County. Volume 1, chapter 3 of the CDP is the main chapter which deals with Energy Strategy, including Onshore Wind Energy. The Strategic aim of this chapter is as follows:

> *"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."*

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The CDP acknowledges that Offaly has historically been a key area for energy production in Ireland with its vast landbanks of peatland. It is recognised however that the need to decarbonise the energy sector is of utmost importance:

> *"Whilst Offaly has a long history of energy production related predominantly to the commercial exploitation of peatlands, national environmental policies are dictating the wind down of traditional fossil fuel powered stations and a diversification of our energy production towards green energy such as wind, solar and bioenergy. Offaly County Council recognises the potential economic benefit of a transition from fossil fuel-based energy production through to investment in renewable energy, the promotion of the green enterprise sector and the creation of green collar jobs; all components of a local 'smart green economy."*

The following policy objectives are relevant to the Proposed Project:

- **CAEO-04:** It is an objective of the Council to ensure the security of energy supply by supporting the potential of the wind energy (and other renewable) resources of the County in a manner that is consistent with proper planning and sustainable development of the area.
- **CAEO-05:** It is an objective of the Council to implement the Council's Wind Energy Strategy as follows:
  - In 'Areas Deemed Open for Consideration for Wind Energy Development' as identified on Map no. 10 'Wind Energy Strategy Designation', the development of wind farms and smaller wind energy projects will be considered.
  - 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).
  - 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 the Development Management Standard 109 contained in Chapter 13 of Volume 1 of the CDP and the Section 28 Ministerial Wind Energy Development Guidelines.
- **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).

Offaly County Wind Energy Strategy

As part of the Offaly CDP, a Wind Energy Strategy (WES) for the county has been adopted. The WES constitutes a plan led approach to wind energy development in County Offaly and sets out areas 'Open for Consideration' for wind energy developments and considerations for the evaluation of wind energy planning applications. These areas have been identified through sieve mapping analysis of the key environmental, landscape and technical criteria which must be balanced in order to identify the most suitable location for wind energy development.

The Proposed Project site, within the administrative boundary of Offaly County Council, is located entirely in an area classified as an area "Open for Consideration" for wind energy development, with all proposed turbine locations being within this area. Areas 'Open for Consideration' are defined as follows in the WES:

> *"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 this County Development Plan and the Section 28 Wind Energy Development Guidelines."*

The Offaly WES includes an assessment of the potential for wind energy in each area of the county; the Proposed Project site falls within Area 2 – Area generally from Cloneygowan to Clonbullogue. The areas wind energy potential is described as follows:

> *"This area is characterised by a predominantly flat and in places slightly undulating landscape with a number of significant tracts of peatlands and transitional woodlands and coniferous forestry, in particular in areas around Walsh Island, Bracknagh and Clonbulloge, along with improved agricultural land, large landholdings and a dispersed pattern of rural housing. The extensive tracts of flat peatlands in this area offer potential to accommodate a wind farm layout with depth, comprising a grid formation giving a better sense of balance and visual cohesion. In addition, there exists a precedent of windfarm and renewable energy projects developed in the area such as Mount Lucas windfarm while other projects have been deemed suitable and are awaiting commencement of development. There exists both good wind speeds and electricity infrastructure in the area.*
>
> *A potential constraint in this area is the objective in Chapter 4 to examine the feasibility of developing Wilderness Corridors at bogs at Cavemount, Esker, Ballycon, Derrycricket, Clonsast North, Clonsast and Derryounce. The Council will not be in favour of any developments proposed on these bogs with the potential to impact upon the character, uniqueness and wilderness potential of these areas. The impact on a potential Wilderness Corridor from any wind farm development will be assessed at project level by the Council."*

The Proposed Project is not located within the bogs identified for the wilderness corridor.

Kildare County Development Plan 2023 – 2029

The Kildare County Development Plan 2023-2029 (CDP) is the principal policy instrument used to manage change in land use in the County. The CDP sets out the Planning Authority's strategic land use objectives and policies for the overall development of the County. Volume 1, chapter 7 of the CDP is the main chapter which deals with Energy and Communications, including Wind Energy. The strategic aim of this chapter is as follows:

> *"To encourage and support energy and communications efficiency and to achieve a reasonable balance between responding to EU and National Policies on climate change, renewable energy and communications and enabling resources to be harnessed in a manner consistent with the proper planning and sustainable development of the county."*

The CDP acknowledges that Kildare, under the National Climate Action Plan 2025, is to encourage wind energy developments. The Kildare CDP has a target to:

> *"Support the target in the Climate Action Plan 2021 for a doubling of existing on-shore wind energy from circa 4GW (today) to 8GW* by 2030."* (*since increased to 9GW under CAP 25)

The following policy objectives are relevant to the Proposed Project:

- **EC O2:** Adopt an informed and positive approach to renewable energy proposals, having regard to the proper planning and sustainable development of the area, including community, environmental and landscape impacts and impacts on protected or designated heritage areas / structures.
- **EC O11:** Encourage wind energy developments in suitable locations in an environmentally sustainable manner whilst having regard to Government policy and the County Wind Energy Strategy, while being sensitive to the EU and national target of 30% of land for biodiversity. Subject to AA screening and where applicable, Stage 2 AA so as to ensure and protect the favourable status of European sites and their hydrological connections. Such developments will have regard for protected species and provide mitigation and monitoring where applicable.
- **EC O50:** Prioritise the sourcing of E.U. and National funding to support projects which assist the transition of the industrial peatlands and the communities traditionally dependant on them, to sustainable after uses.
- **EC O51:** Support Bord na Móna in the preparation of a long-term strategic plan for the former industrial peatlands.

Kildare County Wind Energy Strategy

As part of the Kildare CDP, a Wind Energy Strategy (WES) for the county was adopted. The Kildare WES constitutes a plan led approach to wind energy development in County Kildare and sets out areas 'Open for Consideration' for wind energy developments and considerations for the evaluation of wind energy planning applications. These areas have been identified through sieve mapping analysis whereby GIS data is superimposed and combined to identify areas where multiple overlapping opportunities and constraints exist.

The Kildare WES sets a wind energy target for the county of 107 MW over the lifetime of the CDP. The target figure is double the amount of permitted MW of wind energy in the county at the time of the adoption of the CDP.

The site of the Proposed Project is located entirely in an area classified as an area "Open for Consideration" for wind energy development, with all proposed turbine locations being within this area. Areas 'Open for Consideration' are defined as follows in the Kildare WES:

> *"This area is characterised by medium landscape sensitivity 7 which is a less robust category of landscape sensitivity. It has the potential to accommodate wind farm development subject to a detailed assessment on the visual impact of the proposal on the landscape in particular, and cumulative visual impacts with existing and permitted wind farms. Wind farm developments will be facilitated in this area subject to compliance with normal planning and environmental criteria outlined in Section 5 of this report and the development management standards in the County Development Plan. Wind farm proposals in this area will be required to demonstrate potential for cumulative visual impacts at application stage."*

The Kildare WES further states:

> *"This 'Open to Consideration' zone is... undulating in elevation while mainly flat. It does contain some upland areas especially on the eastern boundary with County Wicklow including the Eastern Uplands. Hilltop views and Scenic Routes... must be a consideration for any wind energy development. This zone also contains the open area of the Western Boglands.*
>
> *The location of a potential wind farm site within an 'Open for Consideration' zone should not be construed as a certainty that planning permission will be granted. All planning applications*

will be assessed on their merits. Particular attention should be given to how perspective schemes would be observed from scenic routes, scenic viewpoints and hilltop views, in particular those associated with the Royal and Grand Canals. It should also be noted that while wind energy schemes may be 'Open to Consideration' within this zoning there are still many site-specific considerations such as impacts to residential amenity and biodiversity will need to be examined at planning application stage. These considerations are listed in the Draft Revised Wind Energy Development Guidelines 2019 and outlined in Section 5 of this strategy." (emphasis added)

From review of the sieve analysis prepared to inform the wind energy classifications, it is clear that the classification of the Proposed Project site as 'Open for Consideration' is based on the landscape sensitivity designation of the area, which is deemed to be 'Landscape Sensitivity Class 2 – Medium Landscape Sensitivity'. 'Acceptable in Principle' areas are largely made up of land within 'Landscape Sensitivity Class 1 – Low Landscape Sensitivity'.

SID Determination Criteria

Under Section 37A(2) of the Act the project must satisfy one of the following criteria:

a) The development would be of strategic economic or social importance to the State or the region in which it would be situate,

b) The development would contribute substantially to the fulfilment of any of the objectives in the National Planning Framework or in any regional spatial and economic strategy in force in respect of the area or areas in which it would be situate,

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

Due to the scale of the proposal, the Proposed Project is of strategic economic and social importance to the Eastern and Midland region and to the state. The capital investment required for a project of the scale proposed, when combined with the commercial rates, contributions, community gain proposals and infrastructure improvements associated with the operation of the Proposed Project will cumulatively represent a significant economic contribution to the Region and the State as a whole.

The Proposed Project is in accordance with the promotion of sustainable energy development as set out in provisions of the National Planning Framework – First Revision and the provisions of the Regional Spatial and Economic Strategy for the Eastern and Midland Region. The project will assist in meeting national renewable energy targets, resulting in significant reductions in carbon emissions from electricity generation. This will in turn reduce the country's reliance on imported fossil fuels, contributing towards the transition to a low carbon and climate resilient society.

The Proposed Project is located within the administrative boundary of both County Kildare and County Offaly. As such, it is considered that the development would affect more than one Planning Authority.

In our opinion the Proposed Project does constitute Strategic Infrastructure Development (SID) under the relevant provisions of the Act. This opinion is based on the fact that the Proposed Project , comprising 47 turbines, will exceed the relevant SID threshold for wind energy development as set out in the Seventh Schedule of the Act (i.e. a wind farm with more than 25 turbines or a generating

capacity in excess of 50MW) and taking into consideration the criteria set out within Section 37A(2) of the Act.

Conclusion

MKO has been commissioned to prepare an Environmental Impact Assessment Report (EIAR) that fulfils the requirements set out by the Environmental Protection Agency in the *'Guidelines on the Information to be contained in Environmental Impact Assessment Reports'* (2022) and Schedule 6 of the Planning and Development Regulations 2001 (as amended) relating to the information to be contained in an EIAR. The preparation of the EIAR is ongoing, an initial constraints and design scoping exercise with the relevant consultees was completed in Q1 2021, and a revised scoping document was issued on December 5th 2025. The Commission will be briefed further on the Proposed Project and accompanying EIAR, including discussions relating to ecological and ornithological surveys, biodiversity mitigation and enhancement proposals, archaeology and landscape, residential amenity (traffic and noise), and aviation, at any future meeting that may be convened.

We understand that the Commission, at its discretion, will facilitate this second meeting to further discuss the details of the proposed Ballydermot Wind Farm, which we would fully welcome. As such, we respectfully request that such a meeting be convened at the earliest convenience of the Commission.

We look forward to hearing from the Commission in due course.

Yours faithfully,



Ronan Dunne

Project Planner,

MKO

Enclosed:

- Site Location Context Map
- Proposed Project Layout
- Proposed Grid Connection Layout
- Wind Energy Strategy Map

660000 670000 680000

730000 720000

N

Highfield Golf Club
Edenderry Golf Club
140 m
Carbury
Coonagh
Timahoe East
R402
Edenderry
R441
Ballyhagan
Derrinturn
Dreenan
Gilltown Lane
Staplestown
Hodgestown (Clane By)
Ticknevin
110 m
115 m
Killinagh Lower
Coolearagh East
Curryhills
Blackwood (Clane By)
Downings North
Allenwood South
R415
R401
Robertstown East
85 m
R414
R409
Clonbullogue
Ballyteige South
131 m
Kilmeage
70 m
R442
81 m
R401
Feighcullen
R415
Newtown (ed Killinthomas)
R419
Rathangan
R442
R419
Mullantine
122 m
Milltown (Connell By)
R445
227 m
R414
Dunmurry Springs Golf Club
Part Of Roseberry
Common (Connell By)
R415
197 m
Newbridge

0 6.5 13 km

660000 670000 680000

Map Legend

Draft EIAR study Boundary

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Spatial Reference
Name: IRENET95 Irish Transverse Mercator
Datum: IRENET95
Projection: Transverse Mercator

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SITE LOCATION - NOT TO SCALE

Drawing Title

Site Location

Project Title

Proposed Ballydermot Wind Farm
Co. Kildare & Co.Offaly

Project No.	Drawing No.	Scale
250708	1	1:130,000
Drawn By	Checked By	Date
CF	EC	11/12/2025

MKO
Email: info@mkoireland.ie/ Website: www.mkoireland.ie

670000

730000

N

T32 T30 T31 T29 T27 T28 T23 T46 T47 T45 T44 T24 T42 T26 T43 T25 T41 T22 T40 T39 T36 T37 T21 T20 T10 T38 T17 T19 T35 T09 T18 T07 T34 T16 T33 T06 T15 T08 T01 T11 T05 T03 T12 T13 T04 T02 T14

0 3 6 km

670000

Map Legend

Proposed Development Layout

- Draft EIAR Study Boundary
- Proposed Turbines
- On Site Substation
- Grid Connection

Access Roads/Tracks

- New Road
- Turning Bay
- Upgrade Road
- Amenity Walkway
- Passing Bay
- Road
- Equestrian Amenity

Additional Information

- Car parking
- Relay Mast - Telecomms
- Construction Compound

Spatial Reference
Name: IRENET95 Irish Transverse Mercator
Datum: IRENET95
Projection: Transverse Mercator

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SITE LOCATION - NOT TO SCALE

Drawing Title
Proposed Wind Farm Layout

Project Title
Proposed Ballydermot Wind Farm
Co. Kildare & Co.Offaly

Project No.	Drawing No.	Scale
250708	2	1:65,000
Drawn By	Checked By	Date
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680,000

730,000

Coonagh

N

Parsonstown (Carbury By)

Timahoe East

nturn

Oreenan

R414

80 m

Scale: 1:10,000

Killinagh Lower

Hodgestown (Clane By)

Coolearagh East

Gil L

Scale: 1:12,000

Currahills

Blackwood (Clane By)

Prosperous

Allenwood North

Allenwood Middle

Allenwood South

Downings North

Derrymullen

Lowtown (Connell By)

Robertstown East

Grangeclare West

Newtown Donore

Mylerstown (Connell By)

Ballyteige South

0 1 2 km

680,000

Map Legend

- Draft EIAR Study Boundary
- Internal Grid
- Overhead Line
- Grid Connection
- Off Site Substation
- On Site Substation

Access Road

- New Road
- Upgrade Road
- Amenity Walkway

Spatial Reference
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Datum: IRENET95
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SITE LOCATION - NOT TO SCALE

Drawing Title

Proposed Grid Connection

Project Title

Proposed Ballydermot Wind Farm
Co. Kildare & Co. Offaly

Project No.	Drawing No.	Scale
250708	3	1:40,000
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660,000 675,000 690,000

735,000

720,000

N

0 5 10 km

Map Legend

- Proposed Turbines
- Grid Connection
- Draft EIAR Study Boundary

Substation

- Off Site Substation
- On Site Substation
- County Boundaries

Kildare Wind Energy Strategy

- Acceptable in Principle
- Not Normally Permissible
- Open to Consideration

Offaly Wind Energy Strategy

- Areas Not Deemed Suitable for Wind Energy
- Areas Open for Consideration for Wind Energy

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Name: IRENET95 Irish Transverse Mercator
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SITE LOCATION - NOT TO SCALE

Drawing Title
Wind Energy Strategy Map
Area Suitable for Wind Farm Development

Project Title
Proposed Ballydermot Wind Farm
Co. Kildare & Co. Offaly

Project No.	Drawing No.	Scale
250708	4	1:125,000
Drawn By	Checked By	Date
TS	AT	03/12/2025

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