FEHILY TIMONEY

DESIGNING AND DELIVERING
A SUSTAINABLE FUTURE

ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR) FOR THE PROPOSED DERRYNADARRAGH WIND FARM, CO. KILDARE, OFFALY & LAOIS

VOLUME II – MAIN EIAR

CHAPTER 4 - PLANNING POLICY CONTEXT

Prepared for:

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4. PLANNING POLICY CONTEXT

4.1 Introduction

This Chapter (Chapter 4) of the Environmental Impact Assessment Report (EIAR) outlines current International, National, Regional, and Local policy (where relevant) in combination with legislation relating to the Proposed Development of Derrynadarragh Wind Farm, which is located in the jurisdiction of County Kildare and County Offaly, and the associated Grid Connection Route which covers the jurisdictions of County Kildare, Offaly and Laois. The Proposed Development thereby refers to all elements of the project to be assessed in the EIAR, the details of which are set out within Chapter 2: Development Description. These elements include the Proposed Wind Farm, Proposed Grid Connection, and Proposed Turbine Delivery Route.

The Irish Planning Policy system is set within a hierarchical structure, as identified in Plate 4-1, below. EU Directives, Planning Legislation, Ministerial Guidelines, Government Policy and Capital programmes inform national policy.

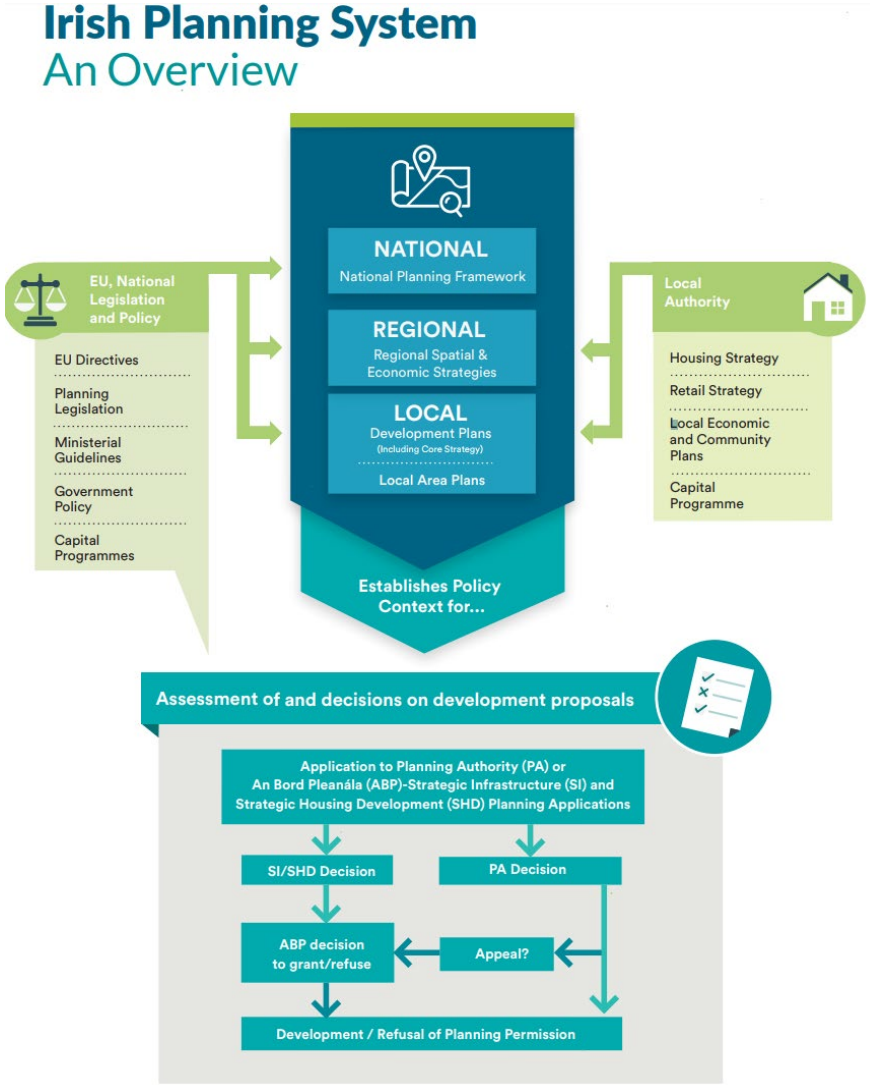

Plate 4-1: Irish Planning System - An Overview (Extract from the National Planning Framework - Ireland 2040)

International and European legally binding agreements, to reduce the reliance on fossil fuels and to manage climate change internationally, have been adopted into Ireland's National Energy Policy. This section of the EIAR outlines how these agreements are being facilitated through National Energy and Climate Policy, with a clear mandate to support onshore wind energy development within the state.

The latest SEAI figures indicate that Ireland has not met its targets up until 2020 under the First Renewable Energy Directive (RED1), and is not on track to meet its targets under the second Renewable Energy Directive (RED2 as amended by REDIII) (SEAI, 2022)[1]. Furthermore, the recent increase in renewable electricity targets to 80% by 2030 under the Climate Action Plan 2024, retained in the Climate Action Plan 2025 indicates the need for significant escalation in renewable energy production in Ireland. The following Chapter sets out how the proposed development complies with national and local energy policy, and will contribute towards Ireland's national renewable energy targets.

4.1.1 EIAR Policy Chapter Authors

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4.2 International Global Policies

4.2.1 United Nations Framework Convention on Climate Change and the Paris Agreement

The Conference of the Parties (COP) is the highest body of the UNFCCC and consists of environment ministers who have met annually since 1995 to assess progress in dealing with the issue of climate change. At the latest Conference of the Parties, COP 29, which was held in Baku, Azerbaijan from the 11th to the 24th November 2024, an agreement was reached for developed nations to pay up to $300 billion per year by 2035 to support climate efforts in developing countries. COP 29 also finalized rules for an international carbon market under the Paris Agreement but failed to agree on how to implement last year's pledge to transition away from fossil fuels, which was deferred to COP 30 in Brazil.

[1] https://www.seai.ie/publications/Energy-in-Ireland-2022.pdf

The International Panel on Climate Change (IPCC) has put forward its clear assessment that the window for action on climate change is rapidly closing, and that renewable energy sources such as wind will have to grow from 30% of global electricity at present, to 80% by 2050 if we are to limit global warming to well below 2°C above pre-industrial levels in accordance with previous COP agreements. COP 28 gave a renewed emphasis on climate action and the increasing viability and role of renewables such as wind energy to provide a more sustainable future. This was emphasised by a key outcome of COP28 which was the "Global Renewables and Energy Efficiency Pledge". Otherwise referred to as the 'COP28 Global Renewables And Energy Efficiency Pledge', this pledge aims to triple global renewable energy capacity by 2030, reaching at least 11,000 GW, with wind energy expected to be a major contributor to achieving this target.

The wind energy sector, represented by organizations like the Global Wind Energy Council (GWEC), actively participated in COP28, where they highlighted the advantages of wind power as a viable and sustainable means of reducing reliance on fossil fuels, boosting energy security, and creating jobs. Former Environment Minister Alan Kelly remarked as far back as 2015 that "As a nation, we must do everything in our power to curb our emissions".

In this regard, the Climate Action and Low Carbon Development Act 2015 as amended by the Climate Action and Low Carbon Development (Amendment) Act 2021 provides for the approval of plans by the Government in relation to climate change for the purpose of pursuing the transition to a low carbon, climate resilient and environmentally sustainable economy.

4.2.2 Kyoto Protocol

In 1997, the *Kyoto Protocol* set legally binding obligations for developed countries to reduce their Greenhouse Gas (GHG) emissions, and two commitment periods were established. The Kyoto Protocol is an international treaty which extends the 1992 United Nations Framework Convention. The Kyoto Protocol came into effect in 2005, as a result of which, emissions reduction targets agreed by development countries, including Ireland are now binding.

Under the *Kyoto Protocol*, the EU agreed to achieve a significant reduction in total greenhouse gas emissions of 8% below 1990 levels in the period 2008 to 2012. Ireland's contribution to the EU commitment for the period 2008 – 2012 was to limit its greenhouse gas emissions to no more than 13% above 1990 levels.

In Doha, Qatar, on 8th December 2012, the Doha Amendment to the *Kyoto Protocol* was adopted. The amendment includes:

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

Published by the International Energy Agency (2023), *Net Zero Roadmap: A Global Pathway to Keep the 1.5°C Goal in Reach* cautions that global renewable energy growth needs to more than double to align with the Paris Agreement objective of achieving net-zero emissions by 2050. The *International Renewable Energy Agency* (IRENA), an intergovernmental organisation focusing on sustainable energy, in its 2024 report Tracking progress toward tripling renewables also notes that, even with the renewable energy pledges contained in the latest *Nationally Determined Contributions* (2023) showing the world remains off-track and the 1.5 °C goal is likely to be exceeded before the end of the century.

4.3 European Union Directives - Legislation and Policy

This section details the latest policies and targets for renewable energy and greenhouse gas (GHG) emissions in Europe with a view to 2030 and beyond. The various Directives and policies of the EU set a clear mandate for each member state to transition to sustainable, renewable energy and reduce greenhouse gas emissions.

4.3.1 Renewable Energy Directive (RED II & RED III)

The EU Directive (2018/2001/EU), known as the Renewable Energy Directive II (RED II), entered into force on 11 December 2018 with one of its aims being to provide guiding principles on financial support schemes for RED, renewable energy self-consumption, energy communities and district heating. As part of RED II, Ireland's overall national target for the share of renewable energy sources (RED-E), forms the backbone of Ireland's strategy to achieve the overall renewable energy target for 2030.

Following on from RED II, the EU adopted 'Directive (EU) 2023/2413', known as Renewable Energy Directive III (RED III) on 20th November 2023, aiming to further increase its renewable energy ambitions. RED III amends RED II, and is in line with the 'European Green Deal (2019), described in 4.3.6 below. RED III sets a new binding target of c. 42.5% renewable energy in the EU's total energy consumption by 2030, with an aspirational target of 45% being introduced. RED III introduces sector-specific targets for transport, heating, cooling and industry, to ensure a balanced contribution from all parts of the economy, and also includes measures to streamline and accelerate the permitting process for renewable energy projects, addressing one of the key bottlenecks in the deployment of renewables.

Under RED III, Member States must ensure that in the permit-granting procedure, the planning, construction and operation of renewable energy plants is presumed to be in the overriding public interest. The faster consenting timelines for renewable energy projects required under RED III have been transposed into Irish law by the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. 274/2025). RED III reflects the EU's commitment to achieving higher renewable energy targets, and facilitating clean energy.

As of 15th August 2025, new measures aimed at fast tracking the permitting procedures for renewable energy projects have been adopted into Irish Law. The European Union (Planning and Development) (Renewable Energy) Regulations 2025 (the Regulations) transpose several provisions of the third Renewable Energy Directive (EU Directive 2023/2413) (RED III). The Regulations introduce measures relevant to the following categories of renewable energy development:

- Energy from a renewable non-fossil source - ***wind energy***, solar energy, geothermal energy, osmotic energy, ambient energy, tide, wave and other ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas or biogas
- Repowering development
- Small-scale renewable energy installations, including heat pumps and solar energy equipment.

The Regulations introduced a new completeness check for applications for renewable energy development.

This new rule provides that where a planning authority or An Coimisiún Pleanála (the Commission) receives an application for permission for the applicable renewable energy and repowering development, it must acknowledge and assess the application for completeness within 45 days of receipt. Once an application has been confirmed as complete, a planning authority or the Commission has 52 weeks to make a decision on whether to grant permission or not.

The commencement of the Regulations marks an important step in ensuring that renewable energy development is fast-tracked and Ireland's wider obligations under RED III are met. The introduction of completeness checks is aimed at addressing issues with applications at an early stage and before the clock starts for the mandatory decision-making periods. For this reason, pre-application consultation will be all the more important particularly for those developments which can no longer be subject to further information requests.

The majority of the new rules are effective immediately with the exception of the EIA opinion provisions. These came into force on 1 October 2025.

4.3.2 Clean Energy for all Europeans Package (2019)

In 2016, based on published Commission proposals, the EU decided to tackle the transition towards clean energy and a carbon-neutral economy by rewriting the EU's energy policy framework to facilitate a clean and fair energy transition. This delivered the Clean Energy for all Europeans Package in 2019, providing a modern, stable legal environment and setting a clear and common sense of direction, the EU aims to stimulate the necessary public and private investment and bring European added value by addressing these challenges. As a package the new rules will reinforce consumer rights, putting them at the heart of the energy transition and creating growth and green jobs in a modern economy. They will enable the EU to show leadership in the fight against climate change following the Paris Agreement.

Member States will continue to choose their own energy mix but must meet new commitments to improve energy efficiency and the take-up of renewables in that mix by 2030. For example, the new rules on the electricity market (under Regulation 2019/943 as amended), which are in force, will make it easier for renewable energy to be integrated into the grid, encourage more inter-connections and cross-border trade, and ensure that the market provides reliable signals for future investment. As part of the Clean Energy Package, Member States are required to draft plans to prevent, prepare for and manage crisis situations in the supply of electricity in coordination with neighbouring Member States, and to enhance the role of the Agency for the Cooperation of Energy Regulators.

4.3.3 European Green Deal (December 2019)

The European Green Deal, published on 11th December 2019, is a growth strategy for the EU which aims to transform the EU into a fair and prosperous society, improving quality of life with a modern, resource-efficient, and competitive economy where there are no net emissions of greenhouse gases in 2050 and where economic growth is decoupled from resource use. The EU aim to do this by becoming climate-neutral by 2050.

With regard to the supply of clean, affordable and secure energy, the European Green Deal underlines the fact that in order to meet the EU's climate and sustainability goals, all sectors must increase their use of renewable energy and phase out fossil fuels.

According to the 2030 Climate Target Plan[2], the EU aim to achieve a greenhouse gas emission reduction of at least 55% by the year 2030, compared to 1990 levels; in order to achieve net-zero greenhouse gas emissions by 2050. A key principle for achieving this will be to develop a power sector based largely on renewable resources.

The EU Climate Law[3] obliges all EU institutions across all areas of competence, and the Member States, to work collectively to achieve the greenhouse gas emission reduction target of 55%.

4.3.4 European Climate Law (July 2021)

The European Climate Law, which entered into force on 29th July 2021, writes into law the goal set out in the European Green Deal for Europe's economy and society to become climate-neutral by 2050. The law also sets the intermediate target of reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels. However, on 6th February 2024, the European Commission presented its updated assessment for a 2040 climate target for the EU.

In July 2025, the European Commission proposed an amendment to the European Climate Law which would set an EU climate target of a 90% reduction in net greenhouse gas emissions by 2040, in comparison to 1990 levels. The proposed 2040 climate target will reaffirm the EU's determination to tackle climate change, and will shape the EU's path after 2030, to ensure the EU reaches climate neutrality by 2050. The climate neutrality objective is at the heart of the European Green Deal.

Climate neutrality by 2050 means achieving net zero greenhouse gas emissions for EU countries as a whole, mainly through cutting emissions, investing in green technologies and protecting the natural environment. The law aims to ensure that all EU policies contribute to this goal and that all sectors of the economy and society play their part. The main objectives of the climate law include:

- Implementation of Existing Laws: Fully implement existing EU laws to reduce emissions by at least 55% by 2030 compared to 1990 levels;
- Decarbonisation of Industry: Focus on decarbonising industry by leveraging strengths in wind power, hydropower, and electrolysers, and investing in technologies for carbon capture, storage, and reuse;
- Boosting Domestic Manufacturing: Increase domestic manufacturing in growth sectors such as batteries, electric vehicles, heat pumps, and solar cells;
- Fairness and Solidarity: Ensure fairness and solidarity by supporting vulnerable citizens, regions, businesses, and workers through tools like the Social Climate Fund and Just Transition Fund;
- Open Dialogue: Maintain an open dialogue with all stakeholders, including farmers, businesses, social partners, and citizens.

4.3.5 RePower EU Plan

The RePower EU Plan was published on 18th May 2022 and is a plan which sets out a response to the hardships and global energy market disruption caused by Russia's invasion of Ukraine and the need for the role of renewable energy to slow down climate change and to phase out Russian fossil fuels by 2027.

[2] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0562
[3] https://climate.ec.europa.eu/eu-action/european-green-deal/european-climate-law_en

To address these, the RePower EU Plan contains measures to:

- Save energy;
- Diversify supplies;
- Quickly substitute fossil fuels by accelerating Europe's clean energy transition;
- Smartly combine investments and reforms.

The RePower EU Plan states:

> *"Wind energy*, in particular offshore wind *represents a significant future opportunity: resources are stable, abundant and public acceptance is higher. Europe is the global leader in offshore wind. To further strengthen the EU wind sector's global competitiveness and achieve the REPowerEU ambition with fast wind energy deployment, supply chains need to be strengthened and permitting drastically accelerated."*

Specific objectives of the REPower EU Plan are that Member States should speed up the green transition and spur massive investment in renewable energy. Ireland will need to enable industry and transport to substitute fossil fuels faster to bring down emissions and dependencies.

4.3.6 Commission Recommendation and Guidance to Member States (EU) 2024/1343 of 13 May 2024 on speeding up permit granting procedure for renewable energy and related infrastructure projects

The Commission Recommendation and Guidance to Member States (EU) 2024/1343 of 13 May 2024 is a document which intends to speed up the permit granting procedure for renewable energy and related infrastructure projects in the European Union. The document provides a number of recommendations and guidance on how to streamline the permitting process, which include some of the following:

- Streamlining procedures: The document recommends that Member States simplify and harmonize their permitting procedures, including by reducing the number of permits required and by streamlining the environmental impact assessment process.
- Digitalization: The document encourages Member States to use digital tools to improve the efficiency of the permitting process, such as by providing online portals for submitting applications and tracking the progress of permits.
- Stakeholder engagement: The document emphasizes the importance of early and effective stakeholder engagement in the permitting process. This includes involving local communities, businesses, and other interested parties in the planning and decision-making process.
- Human resources and skills: The document recommends that Member States invest in the training and development of staff who are responsible for processing permit applications.

The document also provides guidance on how to designate "renewables acceleration areas," which are areas where the deployment of renewable energy projects is not expected to have significant environmental impacts, where the permitting process can be further streamlined, which is likely to have a positive impact on the deployment of renewable energy and related infrastructure in the EU.

Project Response:

In response to European Union Directives and Policy, the increased target for the share of renewable energy in the EU's gross energy consumption and the presumption that energy projects are in the overriding public interest under RED III underlines the vital nature of investments into new renewable energy developments such as the Proposed Development at Derrynadarragh, which would increase the domestic renewable energy production capacity of Ireland and its contribution to the EU overall target.

Under RED III, Member States must ensure that in the permit-granting procedure, the planning, construction and operation of renewable energy plants is presumed to be in the overriding public interest. The faster consenting timelines for renewable energy projects required under RED III have been transposed into Irish law by the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. 274/2025). RED III reflects the EU's commitment to achieving higher renewable energy targets, and facilitating clean energy.

Ireland's renewable energy share, and that of all EU member states, is calculated and monitored by the European Commission under the Renewable Energy Directive (RED), with Ireland continuing to work towards achieving renewable electricity targets. The latest data from the Sustainable Energy Authority of Ireland (SEAI) from September 2024 shows Ireland's total installed wind capacity at the end of 2023 was 4.74 GW, an increase of c. 0.20 GW in capacity during 2023. (Source: SEAI, September 2024). Regarding Irelands commitments to increasing the indigenous supply of renewable energy to reach our stated targets, the report goes on to say:

> *"In its most recent climate action plan (CAP), Ireland has set itself a target of 6 GW of installed wind capacity by the end of 2025. To achieve this target, Ireland will need to add an average of 0.63 GW of installed capacity in both 2024 and 2025. Ireland's target for 2030 is 15 GW of installed wind capacity, with 9 GW of onshore wind and 5GW of offshore wind. Achieving this target will require adding an average of 1.47 GW of installed capacity every year for the next seven years."*

The Proposed Development is expected to generate approximately 64.8MW of renewable wind energy, directly supporting Ireland's contribution to the European Union's renewable energy targets. As described above, the EU has set a goal of reaching a 42.5% renewable energy share by 2030. With Ireland aiming for 15 GW of total installed wind capacity by 2030, the Proposed Development would account for c. 0.4% of Ireland's national target, which is c. 0.014% of the overall required renewable energy target

The Proposed Development reflects the broader EU strategy to accelerate the transition to clean energy. These provisions emphasize the necessity of progressing wind energy developments across Europe, reinforcing the urgency of projects like Derrynadarragh in securing a sustainable energy future.

4.4 National Policies and Legislation

National energy and climate policy are informed by the overarching European Policy which aims to unify the European Union in energy and climate goals. The following section sets out the relevant national policies which will influence the development of the country in the coming decades with respect to energy production, carbon neutrality and climate change mitigation.

These policies are supported by the latest Programme for Government (2025) titled 'Securing Ireland's Future' which presents strong climate governance in rapidly reducing climate change in order to protect and improve public health and quality of life, and had identified wind energy as having a crucial role to play in achieving this. The government are committed to rapid decarbonisation of the energy sector with an aim of providing the necessary actions to deliver national renewable electricity targets. These government ambitions support the ongoing generation of renewable energy from onshore wind sources.

The Climate Action Plan 2024 and Climate Action Plan 2025, which must be read together, state the following commitments:

- To achieve 80% renewable electricity by 2030;
- Deliver 9 GW of onshore wind by 2030;
- Hold at least one Renewable Energy Support Scheme (RESS) auction per year;
- Prioritizing and increase investment in the electricity grid;
- Develop a policy to address repowering and extend the life of existing onshore wind farms.

4.4.1 The White Paper: Ireland's Transition to a Low Carbon Energy Future 2015 - 2030

This Government strategy calls for a radical transformation of Ireland's energy system to meet committed targets and achieve a low carbon energy system by 2050. These commitments included a then EU target to source 20 per cent of its energy needs from renewables such as wind, solar and biomass. Within this, Ireland committed to generating 16% of its overall energy requirements from renewables by 2020 under the EU's plan, with 8% coming from renewables at the time of the document's publication.

The strategy includes an objective to "accelerate the development and diversification of renewable energy generation" and increase the country's output of electricity from renewable sources of which we have a plentiful indigenous supply. It is stated that this will be achieved through a number of means including wind, solar PV and ocean energy. The paper recognises that growth in renewable energy has been led by onshore wind which will continue to be a mainstay in renewable energy generation which is:

> *"a proven technology and Ireland's abundant wind resource means that a wind generator in Ireland generates more electricity than similar installations in other countries."*

4.4.1.1 Project Response

The Proposed Development adheres to the White Paper's strategy to *"accelerate the development and diversification of renewable energy generation"* through the provision of onshore wind generation, which will contribute to an overall increase in the country's output of electricity from renewable energy sources. The Proposed Development also supports the White Paper's goal of mitigating climate change by displacing electricity generated by fossil fuels, which will lead to a reduction in national greenhouse gas emissions. The construction and operation of a wind farm in Derrynadarragh will also increase economic opportunities, which also align with the White Paper's recognition of the economic opportunities inherent in the low-carbon transition.

4.4.2 Climate Action and Low Carbon Development Act 2015, as amended by the Climate Action and Low Carbon Development (Amendment) Act 2021

The Climate Action and Low Carbon Development Act was signed into law in December 2015 and subsequently amended by the Climate Action and Low Carbon Development (Amendment) Act 2021 (the "Climate Act").

The Climate Act

The Climate Act sets out the national objective of transitioning to a low carbon, climate resilient and environmentally sustainable economy in the period up to, and including, the year 2050. The act provides for a solid statutory foundation to the institutional arrangements necessary to enable the State to pursue and achieve the "national transition objective".

The Climate Act provides for the approval of plans by the Government in relation to climate change for the purpose of pursuing the transition to a climate resilient, biodiversity rich and carbon neutral economy by the end of the year 2050. It establishes a legally binding framework with clear targets and commitments set in law, and embeds the necessary structures and processes on a statutory basis to ensure we achieve our national, EU and international climate goals and obligations in the near and long term. The Act significantly strengthens the framework for governance of climate action by the State in order to realise our national, EU and international climate goals and obligations.

When exercising its decision-making powers under the Planning Act, planning authorities and the Commission are obliged under s. 15 of the Climate Act to:

"in so far as practicable, perform its functions in a manner consistent with—

(a) the most recent approved climate action plan,

(b) the most recent approved national long term climate action strategy,

(c) the most recent approved national adaptation framework and approved sectoral adaptation plans,

(d) the furtherance of the national climate objective, and

(e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State."

The Act embeds the process of carbon budgeting into law, with the Government required to adopt a series of economy-wide five-yearly carbon budgets to include sectoral targets for each relevant sector on a rolling 15-year basis. These five-yearly carbon budgets commenced in 2021, with the five-yearly carbon budgets equating to a total reduction of 51% emissions over the period to 2030. This reduction in emissions is in line with the programme for Government which commits to a 7% average yearly reduction in overall greenhouse gas emissions over the next decade to achieve net zero emissions by 2050. This Act will drive implementation of a suite of policies to help us achieve this goal.

The Act also requires for all Local Authorities to prepare individual Climate Action Plans which will include both mitigation and adaptation measures, representing a mandate for Local Authorities to adapt to climate change.

4.4.2.1 Project Response

The Climate Act establishes a framework with clear, legally binding targets and commitments, and ensures the necessary structures and processes are embedded on a statutory basis to achieve our national, EU and international climate goals and obligations in the near and long term. Furthermore, Section 15 of the Act places a statutory obligation on all relevant public bodies to perform their functions in a manner consistent with the most recent approved Climate Action Plan and the National Long-Term Climate Action Strategy. The Proposed Development at Derrynadarragh complies with the overall objective of the Climate Action and Low Carbon Development (Amendment) Act 2021 (the "Climate Act") to achieve a transition to a climate neutral economy by 2050, and supports the targets set out in the Climate Action Plan's made under the Climate Action and Low Carbon Development (Amendment) Act 2021 (the "Climate Act").

The Proposed Development at Derrynadarragh, which proposes contributing up to c. 64MW of renewable energy to climate action goals, should be prioritized, and can only be refused on truly exceptional grounds that demonstrably outweigh their climate benefits, given the statutory obligation on public bodies to support climate policy as required by Section 15.Ireland's Integrated National Energy and Climate Plan 2021 - 2030 (NECP)

Ireland's Integrated National Energy and Climate Plan 2021-2030 (NECP's), published July 2024, is the framework within which Ireland must plan their climate and energy objectives, targets, policies, and measures to the European Commission.

The Governance Regulation (Regulation (EU) 2018/1999 of the European Parliament and of the Council on the Governance of the Energy Union and Climate Action), within which the NECP framework sits, consolidates the patchwork of planning, monitoring, and reporting obligations Member States had under the different pieces of EU legislation across energy, climate, and other Energy Union related policy areas. Member States were required to develop NECP's on a ten-year rolling basis, with an update halfway through which covers the five dimensions of the Energy Union, with the Irelands National Energy and Climate Plan 2021 - 2030 being updated in 2024.

In accordance with the Governance of the Energy Union and Climate Action Regulation, the updated Integrated National Energy & Climate Plan (NECP) 2021-2030 was submitted to the European Commission in December 2023. This document outlines Irelands energy and climate policies for the period from 2021 to 2030 and looks onwards to 2050, and incorporate comments from the Commission, public consultation and updated policies and targets.

The NECP (published July 2024) establishes key measures to address the five dimensions of the EU Energy Union, which include:

- Decarbonisation: GHG emissions and removals and Renewable Energy;
- Energy efficiency;
- Energy security;
- Internal energy market;
- Research, innovation and competitiveness.

It is important to note that Article 4 of the Governance Regulation (Regulation (EU) 2018/1999 of the European Parliament and of the Council on the Governance of the Energy Union and Climate Action), sets out specific trajectory requirements for renewable energy share in key intermediate years of 2022, 2025, and 2027. Ireland's initial NECP (published in 2019) set out specific annual targets for delivery of onshore and offshore wind in order to meet the requirements of Article 4. These intermediate targets will be particularly difficult to deliver and will require early deployment of onshore wind in particular, as the legislative framework underpinning offshore wind is in its infancy.

Within the NECP, relevant renewable energy objectives include:

- Achieve a 43% share of renewable energy in energy consumption by 2030;
- Increase electricity generated from renewable sources to 80% by 2030, underpinned by the Renewable Electricity Support Scheme (RESS);
- Streamline consenting and connection arrangements;
- Facilitate community participation in renewable generation;
- Provide funding supports for new technologies onshore and offshore; and
- Support the ocean energy research, development and demonstration pathway for emerging marine technologies and associated test infrastructure.

4.4.2.2 Project Response

The Proposed Development aligns with the goals contained within the National Energy and Climate Plan (NECP) 2021-2030. The Proposed Development will generate renewable energy through wind which will in turn displace thousands of tonnes of carbon dioxide over the lifetime of the wind farm. Furthermore, the Proposed Development will also enhance Ireland's energy security and contribute to Ireland meeting its challenging climate change and decarbonisation targets as set out within the NECP 2021-2030. The Proposed Development will be a significant energy infrastructure project which, once constructed and operational, will enhance the capacity and resilience of the local, regional, and national electricity network through continued use of the on-site 110kV substation and grid connection cable once the wind farm has been decommissioned. By enhancing the electrical infrastructure and grid connectivity, the Proposed Development facilitates the integration of further renewable energy projects in the area, thus further contributing to the NECP's objective of streamlining grid connections and maximizing renewable energy deployment. During the operational lifetime of the Proposed Development, up to c. 64MW generated by the Proposed Development is projected to displace a net of 65,461 to 76,019 tonnes of CO2 emissions annually, directly supporting the NECP's decarbonisation targets and contribute to Ireland meet its challenging climate change and decarbonisation targets as set out within the NECP.

This will require the implementation of energy security objectives such as support efforts to increase indigenous renewable sources in the energy mix, including wind, solar and bioenergy, and to facilitate infrastructure projects, including private sector commercial projects which enhance Ireland's security of supply and are in keeping with Ireland's overall climate and energy objectives. The Proposed Development will also provide direct and indirect economic benefits to the local community through employment opportunities during construction and operation, the project has facilitated community participation in renewable generation through the project community engagement initiatives as per the objectives of the NECP, and contributions to a Community Benefit Fund which also aligns with the NECP's stated objective of promoting sustainable development and regional economic growth through renewable energy initiatives.

4.4.3 Project Ireland 2040: National Development Plan 2021 - 2030 (NDP) and the National Planning Framework (NPF)

The National Planning Framework (NPF) and the National Development Plan 2021-2030 (NDP) combine to form 'Project Ireland 2040'. The NPF sets the vision and strategy for the development of our country to 2040, and the NDP provides the enabling investment to implement that strategy.

The National Development Plan 2021-2030 (NDP), originally published in October 2021 with a revised NDP published on 22nd July 2025, sets out the Government's over-arching investment strategy and budget for the period 2021-2030. The NDP thereby provides a platform from which investment can be provided and strategized in terms of economic growth, development and sustainability needs. The updated NDP (2025) notes that the review includes an additional €34 billion relative to the previous 2021-2030 NDP including equity funding of €10 billion to 2030 to fund large strategic projects in energy, water and transport.

The National Planning Framework (NPF) sets out the Government's high level strategic plan for shaping Ireland's growth and development up to 2040. As of 30th April 2025, it has been announced that both Houses of the Oireachtas have approved the Revised National Planning Framework (2025), and it is now in effect. The Revised NPF (2025) therefore supersedes the NPF 2018, with the final document now available to view on the NPF website (https://www.npf.ie/).

As a strategic development framework, the NPF demonstrates an approach that joins up ambition for improvement across the different areas of Irish life, bringing the various government departments, agencies, state owned enterprises and local authorities together behind a shared set of strategic objectives for rural, regional and urban development.

This is shown in NPF, Chapter 9, which states:

> *"The Government is committed to a long-term climate policy based on the adoption of a series of national plans over the period to 2050, informed by UN and EU policy. This is being progressed through the National Mitigation Plan and the National Climate Change Adoption Framework, both of which will be updated and reviewed periodically."*

In addition to legally binding targets agreed at EU level, there is a national objective for Ireland to transition to be a competitive, low-carbon, climate resilient and environmentally sustainable economy by 2050, based on the following:

a) "an aggregate reduction in carbon dioxide (CO2) emissions of at least 80% (compared to 1990 levels) by 2050 across the electricity generation, built environment and transport sectors; and

b) in parallel, an approach to carbon neutrality in the agriculture and land-use sector, including forestry, which does not compromise capacity for sustainable food production."

The key role of the NDP is to set out the updated configuration for public capital investment over the next 10 years in order to achieve the National Strategic Outcomes as set out within the NPF. An example of this is outlined in Chapter 13 'NSO 8 - Transition to a Climate-Neutral and Climate-Resilient Society' of the NPF, which states:

> *"The Government will continue to support the deployment of additional electricity generation through the auction-based Renewable Electricity Support Scheme (RESS)"*

When compared to the NPF 2018, the revised framework acknowledges that Ireland needs to make up for lost ground in relation to carbon reduction targets and move towards the objective of achieving climate neutrality by 2050 and places a stronger emphasis on 'carbon neutrality' through the new and revised policies and objectives. Central to the Revised Framework is the theme of 'Transition to a Carbon Neutral and Climate Resilient Society' ' which states:

- The Climate Action and Low Carbon Development (Amendment) Act was enacted in 2021 (the "Climate Act") with a commitment to a legally binding target to reduce greenhouse gas emissions by 51% and increase the share of electricity generated from renewable sources to 80% over the decade (2021 – 2030), and to achieve net zero emissions no later than 2050.
- This objective will shape investment choices over the coming decades in line with the National Climate Action Plan 2024 and the National Adaptation Framework. New energy systems and transmission grids will be necessary for a more distributed, renewables-focused energy generation system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy to the major sources of demand.

In a similar manner to the 2018 edition of the document, the revised NPF is supported by a series of National Strategic Outcomes (NSOs) which the Framework seeks to deliver. These NSOs have undergone review and alteration as part of the revision process, making accommodations for legislation and policy published in the interim and progress that has been delivered on foot of the publication of the original NPF Policy document. The purpose of NSOs is to create a single vision, through a shared set of goals for every community across the country, and those which are appropriate to the proposed wind energy development are outlined in the table below:

Table 4-1: Revisions to National Strategic Outcomes (NSOs), Revised NPF (April 2025)

Policy Objective	Description
National Strategic Outcome 8: Transition to a Carbon Neutral and Climate Resilient Society	Climate change is expected to have diverse and wide-ranging impacts on Ireland's environment, society, and economic development, including on managed and natural ecosystems, water resources, agriculture and food security, human health, and coastal zones. Our low-lying areas and cities and many rural areas are potentially vulnerable if we do not take the appropriate steps to better manage the impacts of climate change. The Climate Action and Low Carbon Development (Amendment) Act enacted in 2021 commits to a binding target to reduce greenhouse gas emissions by 51% and increase the share of electricity generated from renewable sources to 80% over the decade (2021 – 2030), and to achieve net-zero emissions no later than 2050. The national climate objective is to achieve a competitive, low-carbon, climate-resilient, biodiversity rich, and environmentally sustainable and carbon neutral economy by 2050. Sustainable land use management is required in order to achieve a balance between the built environment, natural environment, biodiversity and climate. The NPF is committed to the achievement of compact and sustainable growth, supporting the provision of sustainable transport options, water services delivery and the delivery of renewable energy development while protecting and where possible enhancing and restoring our natural environment in order to ensure sustainable development for our planet and future generations. Adaptation measures will be required to respond locally specific, place-based responses, which address not only climate impacts but also integrate coherently with local social, economic and ecological systems. The electricity sector faces a significant challenge to meet its requirements under the targets set out in Climate Action Plan 2024. Electricity will also play a key role in the decarbonisation of other sectors through electrification, including transport, heating, and industry. The accelerated delivery of additional renewable electricity generation is therefore essential for Ireland to meet its climate targets, reduce its greenhouse gas emissions, and improve its energy security by reducing reliance on imported fossil fuels and diversifying its electricity supply. New energy systems and transmission grids will be necessary for a more distributed, more renewables focused energy generation system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy. State-owned commercial enterprises are significant players in the energy market, which is subject to EU regulatory framework.

Policy Objective	Description
	The diversification of our energy production systems away from fossil fuels and towards green energy such as wind, wave, solar and biomass, together with smart energy systems and the conversion of the built environment into both generator/consumer of energy and the electrification of transport fleets require the progressive and strategic development of a different form of energy grid. To this end, Smart Specialisation will increase the regional uptake of new advanced technologies to increase the reach of the green transformation across Irish enterprise. The development of onshore and offshore renewable energy is critically dependent on the development of enabling infrastructure including grid facilities to bring the energy ashore and connect to major sources of energy demand. We also need to ensure more geographically focused renewables investment to minimise the amount of additional grid investment required, for example through co-location of renewables and grid connections. Ireland benefits from interconnection with the UK gas pipeline network and while there are two gas pipelines with two separate entry points into the island of Ireland, both pipelines are connected through a single facility in Moffat, Scotland. In addition, our gas storage capacity is limited, which poses a security of supply risk and constrains smoothing of seasonal fluctuation in gas prices. **Green Energy** • Deliver 80% of our electricity needs from renewable sources by 2030 with a strategic aim to increase renewable deployment in line with EU targets and National policy objectives out to 2030 and beyond. It is expected that this increase in renewable deployment will lead to a greater diversity of renewable technologies in the mix. • Reinforce the distribution and transmission network to facilitate planned growth and distribution of a more renewables focused source of energy across the major demand centres • Strengthen energy security and resilience to support an island population of 8 million people through effective north-south electricity grid interconnection as well as exploring other EU interconnection options in the longer term to 2040. • Consideration of carbon neutral electricity generation that would be facilitated through harnessing carbon capture and storage (CCS). • National Interconnector (Sub-sea Ring around Ireland) or other solutions offer the potential to connect Ireland to the EU electricity grid System. • Roll-out of the National Smart Grid Plan enabling new connections, grid balancing, energy management and micro grid development. • District heating networks will be developed, where technically feasible and cost effective, to assist in meeting renewable heat targets and reduce Ireland's GHG emissions.

There are a number of key alterations made to NSO 8 as part of the NPF revision process, which include:

- There has been a noticeable alteration in the terminology and wording surrounding carbon, which has been modified to state 'carbon neutral' as opposed to 'low carbon'. This emphasises that, from a government standpoint, carbon neutrality is being targeted and prioritised instead of a reduction which was an aim of the previous plan iteration.
- Reference is drawn to the requirement of efficiently delivering renewable energy infrastructure and projects within the Irish landscape. It is of note that attention is drawn to accelerating the delivery of such projects, and reference is drawn to energy systems and transmission grids.
- An ambitious target of delivering 80% of our electricity needs from renewable sources by 2030, in line with EU Targets and other national policy, is referenced and introduced into the NPF. This doubles the previously referenced target of 40% by 2020.
- District heating is introduced and referenced in the context of meeting renewable heat targets and reducing GHG emissions.

Additionally, a series of revised National Policy Objectives (NPOs) have been developed as part of the NFP review, which set the context for regional and local planning policy in Ireland. In the context of the proposed development, the following revised NPOs are considered the most relevant (see Table 4-2):

Table 4-2: National Policy Objectives (NPOs) from Project Ireland 2040: The National Planning Framework, April 2025

Policy Objective	Description
National Policy Objective 66	The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the medium and longer-term requirements of all relevant environmental and climate legislation and the sustainable management of our natural capital.
National Policy Objective 69	Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions as expressed in the most recently adopted carbon budgets.
National Policy Objective 70	Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a climate neutral economy by 2050.
National Policy Objective 71	Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development.
National Policy Objective 73	Manage the sustainable development of Ireland's renewable energy resources, having regard to their environmental, social and economic impacts, and to contribute to meeting Ireland's national and EU renewable energy targets, thereby contributing to climate action objectives.

<table>
<tr><th>Policy Objective</th><th>Description</th></tr>
<tr><td>National Policy Objective 74</td><td>Each Regional Assembly must plan, through their Regional Spatial and Economic Strategy, for the delivery of the regional renewable electricity capacity allocations indicated for onshore wind and solar reflected in Table 9.1 below, and identify allocations for each of the local authorities, based on the best available scientific evidence and in accordance with legislative requirements, in order to meet the overall national target.
Table 9.1 | Regional Renewable Electricity Capacity Allocations
<table><tr><th>Region</th><th>Energised capacity 2023 (MW)</th><th>Additional Renewable Power Capacity Allocations (MW)</th><th>Total % of National Share in 2030</th><th>Energised Capacity 2023 (MW)</th><th>Additional Renewable Power Capacity Allocations (MW)</th><th>Total % of National Share in 2030</th></tr><tr><td></td><td colspan="3">Onshore Wind</td><td colspan="3">Solar PV</td></tr><tr><td>Eastern and Midlands</td><td>284</td><td>1,966</td><td>25%</td><td>306</td><td>3,294</td><td>45%</td></tr><tr><td>Northern and Western</td><td>1,761</td><td>1,389</td><td>35%</td><td>0.3</td><td>959</td><td>12%</td></tr><tr><td>Southern</td><td>2,622</td><td>978</td><td>40%</td><td>138</td><td>3,302</td><td>43%</td></tr><tr><td>Total</td><td>4,667</td><td>4,333</td><td></td><td>445</td><td>7,555</td><td></td></tr></table></td></tr>
<tr><td>National Policy Objective 75</td><td>Local Authorities shall plan for the delivery of Target Power Capacity (MW) allocations consistent with the relevant Regional Spatial and Economic Strategy, through their City and County Development Plans.</td></tr>
</table>

Furthermore, a number of new sections have been introduced into the NPF as part of this revision process with regards to renewable energy. The key points from each of these 4 no. new sections have been summarised in turn below:

- **Energy Security in Ireland:** This draws reference to the 'Energy Security in Ireland to 2030' document published by the government in November 2023. It details at a high level that Ireland's future energy will be secure by moving from a fossil-fuel based energy to system to an electricity led system and outlines that as part of the review process that risks to oil, natural gas, and electricity were considered. The section discusses at length the role of gas in facilitating a just and secure transition to this new energy system, Irish sources of gas, and that exiting infrastructure and supply sources are able to meet Ireland's gas demands in the medium and long run. However, it is also emphasised that Ireland relies heavily on gas imports from the UK and any impact would be hugely significant on Ireland's economic and social well-being.

- **Renewable Electricity:** This section outlines the ambitious targets to achieve 9GW of onshore wind, 5GW of offshore wind, and 8GW of solar by 2030 which have been set. It once again references that the accelerated delivery of additional renewable electricity generation is critical in achieving these targets and other targets as outlined at an EU level.

- **Rural Areas and Energy Production:** Reference is drawn to rural areas continuing to play a role in contributing to Ireland's energy future. However, novel ideas such as the co-location of energy projects and agricultural industry; or the development of renewable energy projects on urban commercial and industrial sites including brownfield sites are introduced. In many ways, this section can be viewed as an attempt to maximise the use of limited land for renewable projects. Further discussion surrounding the potential economic and community benefits is also elaborated upon.

- **Making a just transition - Peatlands:** It has been identified that 21% of the Irish landscape comprises bogland, and some of Ireland's cutaway bogs are suitable for facilitating the generation of energy, most notably wind or biomass. However, it is outlined that this land area is Ireland's largest carbon sink, occupying 64% of our total soil organic carbon stock. In this context, it is identified that a careful balance between the development of renewable energy projects on bogland and its preservation will need to be achieved going forward.

4.4.3.1 Project Response

The Proposed Development aligns with the new National Policy Objectives (NPO's), as set out within the Revised NPF 2025, and has been assessed as having suitable wind resources which facilitate the development of the rural economy through supporting a sustainable and economically efficient energy industry while maintaining and protecting the natural landscape and built heritage, which are vital to rural tourism in the East of Ireland.

NPO 66 and NPO 70 focuses on the balance between achieving the government's commitment to increasing the contribution of renewable energy sources across Ireland to meet ambitious climate targets, whilst also acknowledging that renewable energy infrastructure, including wind farms, must be sited in environmentally appropriate locations and developed sustainably. The proposed development aligns with these National Policy Objections by demonstrating through the site selection process undertaken, that the chosen location is appropriate and that the wind farm is to be developed in a sustainable manner by carefully considering and mitigating any potential environmental and social impacts to align with the other NPO's described above in Table 4-2.

NPO 71 supports upgrading and developing Ireland's electricity grid infrastructure, with the Proposed Development aligning through delivery of an on-site 110kV TSO substation to improve the electrical infrastructure and connecting into the grid at the existing Bracklone substation.

NPO 73 highlights the need for the comprehensive assessment of the project's sustainability in relation to aspects such as environmental, social and economic factors. The Proposed Development demonstrates how it contributes to national renewable energy targets and climate action objectives through carefully considered site selection process, delivery of 9 no. turbines (approx. 64.8MW) with on-site 110kV TSO substation and amenity area feature for the general public to utilise.

NPO 74 and NPO 75 illustrates the government's overall commitment to diversifying and decarbonizing the energy system and highlighting the important of the RSES for each Regional Assembly, in this case Eastern and Midlands Regional Assembly. The proposal (approx. 64.8MW) will help to go some way towards meeting the overall national target, and critically the allocated 1,966 MW additional renewable power capacity identified for onshore wind within the Eastern and Midlands Region.

The renewable energy generated by the Proposed Development will significantly contribute towards increasing renewable energy as a long term and sustainable alternative to fossil fuel and a transition to a carbon neutral economy whilst also contributing to the revised ambitious renewable energy targets outlined in the revised Plan. It will also assist in achieving further energy security, through diversifying energy sources and delivering additional power to the grid.

4.4.4 Climate Action Plan 2024 (CAP24) and Climate Action Plan 2025 (CAP25)

The Government published Climate Action Plan 2024 (CAP24) on 20th December 2023, this was the third updated action plan following on from the inaugural plan of 2019 which was a result of the Irish Government declaring a climate and biodiversity emergency on 9th May 2019. As of April 2025, Climate Action Plan 2025 (CAP25) has been published, with the government's website stipulating that CAP25 is to be read in conjunction with CAP24.

The CAP provides a framework for delivering the Government's target of a 51% reduction (relative to 2018) in greenhouse gas (GHG) emissions by 2030. CAP24 follows the *Climate Act*, which commits Ireland to a legally binding target of net zero greenhouse gas emissions no later than 2050, and a reduction of 51% by 2030. The Act provides a governance framework for annual revisions of the Climate Action Plan and the development of a National Long-Term Climate Action Strategy at least once every ten years. As part of this plan, the Government is also committed to reducing emissions by an average 7% per annum by 2030. The CAP24 is underpinned by a series of sectoral emissions reduction ambitions and enabling actions.

CAP24 sets out an objective to more than double Ireland's onshore wind energy capacity to 9 GW by 2030 in order to meet new renewable energy targets and reduce emissions. Key actions of relevance to the Project include:

- *The electricity system must achieve a 75% reduction in CO2, reaching 3MtCO2eq in the final year of 2026 - 2030 carbon budget period.*
- *Deliver up to 9 GW onshore wind (with 6GW by 2025) by 2030.*
- *Complete a revised version of Shaping our Electricity Future to define required new grid construction and reinforcements to achieve sectoral ceilings and carbon budgets.*
- *As an urgent priority, establish the investment framework and competitive market, arrangements needed to deliver zero carbon system services.*
- *Align the relevant constituent elements of the planning and permitting system to support accelerated renewable energy development and ensure renewables will be considered to be in the overriding public interest.*
- *Action EL/24/1:* Establish an Accelerating Renewable Electricity Taskforce to publish programme of work.
- *Action EL/24/2:* Establish an Offshore Wind Delivery Taskforce to publish key actions for 2024.
- *Action EL/24/3:* Revision to the National Planning Framework to include regional capacities for the allocation of national targets at a regional level in order to inform local development plan policy.
- *Action EL/24/4:* Publish Regional Renewable Electricity Strategies.
- Action EL24/6: Publish revised methodology for Local Authority Renewable Energy Strategies.
- Action EL/24/7: Publish new Electricity Generation Grid Connection Policy.
- Action EL/24/8: Deliver onshore and offshore RESS auctions as per the annual RESS auction calendar.
- Action EL/24/9: Develop a Private Wires Policy Framework.

- Action EL/24/13: Publish annual report setting out identifiable public benefits delivered by renewable energy sector.
- Action EL/24/14: Complete economic and spatial analysis to inform the development of the ORE Future Framework.
- Action: EL/24/15 Submit to DECC timelines of large-scale onshore grid development projects to be delivered in 2024 and publish an appropriate version.
- Action: EL/24/19 Develop and publish data sets showing the likely locations, volumes, and load profile of surplus renewable generation on our electricity grid.
- Action EL/24/20: Implementation of CRU Energy Demand Strategy.
- Action EL/24/22: Implementation of enhanced emissions reporting framework for electricity emissions for large energy users and the system operators dispatch actions.
- Action EL/24/30 Complete a stakeholder consultation for an evidence-based decarbonisation pathway for the electricity system to net-zero and support future iterations of the Climate Action Plan.

CAP25 reiterates many of these objectives outlined in CAP24, including the need to double Ireland's onshore wind energy capacity to 9 GW by 2030 in order to meet new renewable energy targets and reduce emissions. The CAP25 comprises a number of new, strategic actions however much of the detail behind the actions is still contained within CAP24. The key CAP25 actions of relevance to this project include:

- It establishes a target for Carbon Budget 1 (2021-2025) of 40 MtCO2eq, requiring a 75% across all sectors. Current EPA projections indicating an overshoot of over 1 MtCO2eq.
- It establishes a target for Carbon Budget 2 (2026-2030): 20 MtCO2eq requiring a 75% across all sectors. Current EPA projections indicating an overshoot of over 5MtCO2eq.
- Align, as relevant, with the Accelerating Renewable Electricity Taskforce Implementation Plan which sets out a roadmap for the actions to be taken in the near-term to help meet our 2030 targets.
- Action EL/25/1: Manage the Renewable Electricity Support Scheme.
- Action El/25/2: Publish a long Duration Energy Storage Procurement recommendations paper.
- Action EL/25/3: Development a data sharing framework regarding Low Carbon Technologies connection to the electricity grid.
- Action EL/25/4: Develop Smart-flex standards roadmap.
- Action EL/25/5: Develop consumer-led flexible demand processes.

4.4.4.1 Project Response

In May 2025, the Environmental Protection Agency (EPA) published its Assessment of Progress on Carbon Budget Compliance document entitled "Ireland's Greenhouse Gas Emissions Projections 2024 - 2055". The report does not provide specific details on wind energy beyond general statements, however, the document provides an in-depth analysis and projections of greenhouse gas emissions in Ireland from 2024 – 2055. At present, binding annual emission limits for the 42% reduction have been set for 2021 to 2025, and limits for 2026-2039 are due to be set later in 2025 (these projections are not yet available at time of writing). In relation to key findings, the report notes the following in relation to Electricity Generation:

"" From 10.6 Mt CO2eq in 2018, emissions from the Energy Industries sector are projected to decrease to between 3.4 and 4.4 Mt CO2eq in 2030 (a 59 to 68 per cent reduction). Renewable energy generation at the end of the decade is projected to range from 60 to 68 per cent of electricity generation."

In relation to the sectoral emissions ceilings for the first two carbon budget periods, the report notes that:

- Ireland is not on track to meet the 51 per cent emissions reduction target (by 2030 compared to 2018) based on these projections which include many 2024 Climate Action Plan measures. Greenhouse gas emissions are projected to be 9 to 23 per cent lower by 2030 (compared to 2018) which places Ireland further from the 2030 national climate target compared to previous assessments;
- Budget period 1 (2021-2025) of 295 Mt CO2eq is projected to be exceeded by between 8 to 12 Mt CO2eq. Budget period 2 (2026-2030) of 200 Mt CO2eq is also expected to be exceeded by a significant margin of 77 to 114 Mt CO2eq (with carryover from Budget period 1).;
- Sectoral emissions ceilings for 2030 are projected to be exceeded Buildings, Electricity, Industry and Transport sectors; and met by the sector 'Other';
- Ireland will not meet its non-ETS EU targets of a 42 per cent emissions reduction by 2030 in WAM even with both the ETS and LULUCF flexibilities applied;
- Additional measures and accelerated implementation of existing measures is necessary to meet both National and EU targets. Projected gaps to National and EU 2030 targets reported this year are larger than last year due to more conservative delivery of measures and associated estimates of emission reductions by 2030. Emissions from the Energy Industries sector are projected to decrease by between 3.4 and 4.4 Mt CO2eq in 2030 (a 59 to 68 per cent reduction). Renewable energy generation at the end of the decade is projected to range from 60 to 68 per cent of electricity generation.

In relation to sectoral emissions ceilings, the energy production from the Proposed Development is estimated to be 64.8 MW. Based on the Scottish Windfarm Carbon Assessment Tool, if we conservatively assume a capacity factor of 31% and the fraction of output to back up is 1.93% (i.e 5% of capacity factor) and include the average of 64.8 MW of energy production of the Proposed Development, it would be expected the Proposed Development will result in a reduction in annual emissions in the electricity sector of 44,697 tonnes of C02 per annum. This calculation is set out at Section 7.4.3.1 of EIAR Chapter 7 - Air and Climate.

The 2024 and 2025 Climate Action Plan's established a target of 6GW of installed onshore wind capacity by 2025 and 9 GW by 2030, with c. 4.6 GW's installed onshore wind capacity currently in the Republic of Ireland. This leaves a gap of c. 4.4 GW's to achieve the 2030 target. As such, the Proposed Development has the potential to contribute c. 1.1% of the total additional onshore wind capacity require nationally.

In the context of the urgent need to deliver renewable projects and the projected shortfall in available projects to meet targets, every individual project is critical. The Proposed Development at Derrynadarragh would contribute to increasing Ireland's renewable, domestically produced, wind energy, helping to reduce emissions, improve energy security and achieve electricity the targets such outlined in CAP24 and CAP25.

4.4.5 Eirgrid Assessment of Progress with Carbon Budget Compliance

Emissions analysis completed by Eirgrid[4] in December 2023 indicated that in a best case / optimistic case scenario Ireland will have utilised 59.8 Mt of our 60 Mt CO_2 equivalent emissions budget by the end of 2029, leaving a budget of only 0.2 Mt for 2030. However, in their central case scenario they are predicting that Ireland is currently on track to substantially overshoot this emissions target with emissions across the decade projected to reach 79.5 Mt. This would represent a 32.5% exceedance of our legally binding limits. This central case assessment is underpinned by assumptions in relation to the installed capacity of renewables set out in Table 4-3, below.

Table 4-3: EirGrid central case installed capacity assumptions resulting in a 32.5% exceedance of our sectoral emissions ceilings

Plant	Unit	2022	2023	2024	2025	2026	2027	2028	2029	2030
Onshore Wind	MW	4717	5046	5531	5800	6100	6400	6700	7000	7000
Solar PV	MW	462	1121	1870	2569	3155	3741	4327	4914	5500
Offshore Wind	MW	25	25	25	25	25	25	725	2865	5000

It is also worth noting that:

- This scenario is one which sees Ireland falling short on its 9000MW installed capacity target for onshore wind and is non-compliant with our carbon budget and sectoral emissions ceilings.
- Data for RESS 4 is pending following the most recent auction, therefore, the latest RESS data is from RESS 3 (Sept 2023), which showed Ireland has yet to reach the onshore wind installed capacity specified in this non-compliant scenario for 2022, as the Final Auction results from RESS 3 indicate Onshore Wind energy was successful in 148.4MW.
- The volumes clearing the RESS 3 auction fell well short of the volumes originally targeted for this auction and would not appear to be sufficient to align with even this non-compliant scenario – in other words, developments since that Eirgrid analysis was conducted are supportive of a conclusion that even the non-compliant central case scenario is out of reach.

4.4.5.1 Project Response

The Proposed Development seeks to support Ireland in reducing the exceedances in emissions that are predicted in Eirgrid's "Assessment of Progress with Carbon Budget Compliance", and thereby significantly contributing to Ireland's renewable energy targets. This project will help reduce carbon emissions by displacing C02 over its operational lifetime, thus, supporting the national goal of transitioning to a low-carbon economy. Additionally, the Proposed Development will enhance the stability and flexibility of the electricity grid.

[4] https://www.gov.ie/pdf/?file=https://assets.gov.ie/245172/2c2fd729-261b-4b64-af5e-c7f5f8d18924.pdf#page=null

4.4.6 All-Island Resource Adequacy Assessment 2025-2034

The All-Island Resource Adequacy Assessment 2025-2034 represents the first edition of the framework, an evolution of the previous annual Generation Capacity Statement. The report seeks to outline the expected electricity demand and the level of generation capacity that will be required on the island of Ireland over the next 10 years to maintain security of electricity supply and economic growth. This analysis will then be used to support Government and Regulatory Authorities in the development of energy policy. As the transmission system operators for Ireland and Northern Ireland, EirGrid and SONI are working to ensure that everyone has electricity when they need it while preparing the transmission grid to provide 80% of our power from renewable sources, in line with Government targets in both jurisdictions.

The Assessment indicates a potentially challenging outlook in Ireland across the study period up to 2034. Looking out to 2030, electricity demand is set to increase as consumers use electricity in new ways. New government policies are expected to help guide us away from fossil fuels toward alternative heating methods, such as electric heat pumps, and cleaner modes of transport, such as electric vehicles. This changing demand and generation supply landscape will require coordinated management of both the volume and type of new capacity, alongside new ways of managing increasing demand to ensure security of supply.

In this assessment, a new approach has been taken in terms of assessing resource adequacy and two scenarios have been identified namely a Base and a Secure scenario. The Base scenario analyses the adequacy position in line with the European Resource Adequacy Assessment (ERAA), and the Secure scenario analyses the system considering Low Imports, Annual Run Hour Limits (ARHL) and other operational requirements. EirGrid and SONI consider the Secure scenario is most prudent and should be adopted for decisions relating to securing capacity for the continued secure and sustainable operation of the power system, noting that capacity market auctions remain an option to procure new generation which could address capacity shortfalls in the medium to long term.

Ireland has a renewable policy goal to deliver 80% renewable electricity by 2030. EirGrid has considered the Renewable Electricity Support Scheme (RESS) and Offshore RESS auction results, ESBN connection data and latest transmission connections processes data to develop a trajectory for deployment of new renewable capacity. Furthermore, EirGrid have engaged with the Sustainable Energy Authority of Ireland (SEAI) who have developed renewable generation forecasts based on judgments from a pool of expert stakeholders. These forecasts have been used in the core assessment in this report.

The results of the assessment notes that from 2025 to 2027, both scenarios (Base and Secure) show the system is outside of standard, meaning additional capacity is required. From 2028 to 2032, the base scenario is within standard, meaning there is sufficient capacity to operate the system under normal conditions. The secure scenario, however, remains outside of standard, meaning an additional 600-800 MW is required to ensure we can continue to balance supply and demand under more challenging conditions. The additional MW capacity is required in the secure scenario to provide system reserve requirements (for when the demand for electricity is high) as well as facilitate network outages (which are needed when we connect new generation and infrastructure to the grid). From 2033 to 2034 both scenarios show the system is outside of standard, meaning additional capacity is required in the range of 100-1000 MW.

EirGrid considers the Secure scenario is most prudent and should be adopted for decisions relating to securing capacity for the continued secure and sustainable operation of the power system.

4.4.7 Ireland's Greenhouse Gas Emission Projections, 2023-2050

The Environmental Protection Agency (EPA) are responsible for developing annual national emission projections for greenhouse gases for all key sectors of the economy, including transport.

The EPA's publication entitled Ireland's Greenhouse Gas Emission Projections (2024)[5] provides an updated assessment of Ireland's projected greenhouse gas emissions out to 2050 which includes an assessment of progress towards achieving its 51% emission reduction targets to 2030 set down under the EU Effort Sharing Decision (Decision No 406/2009/EC). Ireland's 2020 target was to achieve a 20% reduction of non-Emission Trading Scheme (non-ETS) sector emissions (i.e. agriculture, transport, the built environment, waste and non-energy intensive industry) on 2005 levels with annual binding limits set for each year beyond 2020. 2030 targets for EU Member States were adopted by the European Council in April 2023. Ireland's 2030 target under the Effort Sharing Regulation is a 42% reduction of emissions compared to 2005 levels by 2030. There will be binding annual limits over the 2021-2030 period to meet that target.

4.4.7.1 Project Response

During its operation, the estimated 151,530 MWhr – 175,971 MWhr (megawatt hours) of electricity per year produced by the Proposed Wind Farm would be sufficient to supply approximately 45,990 Irish households, based on the average Irish household using 4.2 MWh of electricity (this figure is available from the March 2017 CER Review of Typical Consumption Figures Decision). Thus, this energy will be used to offset the same amount of energy that would otherwise be generated through the burning of fossil fuels at power stations.

It is estimated that approximately 65,461 to 76,019 tonnes of CO2 emissions per annum will be offset due to the proposed Derrynadarragh Wind Farm. As a result, the operational stage of the proposed wind farm will have a significant long term positive impact on air quality and climate change, in line with policy and legislation at a local, regional, national and international level.

Further details relating to the positive effects of the proposal on air quality and climate change are included in Chapter 7 of this EIAR.

4.4.8 Climate Change Advisory Council (CCAC) Assessment

In its 2025 Annual Review 'Our Changing Climate in 2024', published on 19th March 2025, the CCAC concluded that, at the current rate of policy implementation is too slow and fragmented, and more effective engagement across all segments of policy and society is required to empower sustainable decision-making and to understand and remove barriers to action.

This stark warning was issued shortly after warning from the Environmental Protection Agency (EPA) in its report 'Ireland's Final Greenhouse Gas Emissions 1990-2022' (2024), which confirmed that Ireland is now tracking a 29% reduction in its greenhouse gas emissions by 2030 compared with its 51% legally binding target.

4.4.8.1 Project Response

The report notes that despite the stark outlook, increased renewable energy generation, from wind solar, if delivered as planned, can reduce Energy Industry emissions by 60 per cent, and achieve over 80 per cent renewable electricity generation by 2030. The Proposed Derrynadarragh Wind Farm has the potential to support the urgent action required as highlighted in the CCAC report and improve the potential rate of delivery to achieve a more rapid fall in emissions in line with targets, which are outlined in section 4.4.5, above.

[5] EPA-Ireland's-GHG-Projections-Report-2023-2050.pdf

4.4.9 National Onshore Wind Targets - State of play (Jan 2025)

Published on 16th January 2025, the national onshore wind targets from late 2024 are shown below in a database of projects at various stages of development. These figures give an approximate indication of the National Onshore Wind Targets - State of play and are prepared from sources including ESB Networks and EirGrid documents, and publicly available information sources such as the County Council Planning Portals or An Comisiún Pleanála (the "Commission").

At the time of the latest update in December 2024, the database indicated that the onshore wind pipelines in Ireland could be summarised as shown in Table 4-4 below:

Table 4-4: Summary of onshore wind development projects at specific stages in the development process

Project Phase / Category	MW's
Energised	c. 4,812MW
With planning permission and grid access	c. 717MW (10 projects)
With planning permission and queued for grid access	c. 31
In planning process	c. 1,598MW (30 projects)
Energised but will be 25 years or older in 2030 (i.e energised in 2005 or before)	c. 500MW

If we take reasonably optimistic assumptions in relation to the various projects noted above we would optimistically estimate that all currently known projects will deliver c. 7,627MW out of a total target of 9,000MW by 2030.

Noting the above attrition factors and points below on timing for delivery, this implies that the State needs to see planning applications for c. 3, 126MW in the period from now to 2026, with an 80% success rate in planning, if the State is to have any chance of delivering on our 9,000MW onshore wind target. It is also important to note that the accelerated delivery of this onshore wind target is critical to achieving compliance with the legally binding sectoral emissions ceilings for the electricity sector.

This above approximate conclusion applies an appropriate attrition factor of between 30% to 35% for on-shore wind projects, which includes projects which may be delayed or cancelled due to failure to obtain planning permission, lack of funding, or financial viability, technical challenges to site suitability or grid connection and community opposition to projects.

4.4.9.1 Project Response

A review of planning applications for on-shore wind in the planning process in Ireland in 2024, show that, for applications submitted to An Comisiún Pleanála (the "Commission") for example, planning permission was granted for 10 new wind farms with a combined capacity of c. 717 MW, which equates to c. 42% of wind energy needed to meet the target as contained within the Climate Action Plan. In the same period in 2024, the Commission refused planning applications for 12 no. wind farms, with an estimated combined capacity of 677 MW, while 30 projects totalling 1,598 MW were awaiting decision at the end of 2024. There is a clear national mandate to accommodate significant onshore wind within the next decade, c. 1,720 MW of additional wind energy required each year for Ireland to achieve wind energy capacity of 9 GW by 2030. Since the beginning of 2025, the "Commission has approved 11 no. Wind Farm related projects: 1 regarding the repowering of a Wind Farm; 1 pertaining to the continuation of operation of a Wind Farm; and 9 new Wind Farm developments. This facilitates the generation of between 288.4 to 340.2MW of wind energy per annum.

4.4.10 National Energy Security Framework

In response to the European Commission's REPowerEU action statement the Government of Ireland issued the National Energy Security Framework in June 2023, in order to address Ireland's energy security needs in the context of the war in Ukraine. It sets out how Ireland is seeking to phase out dependency on Russian gas, oil and coal imports as soon as possible in order to address the urgent need to secure Irelands energy supply. It is focused on three key areas of work:

- Reducing demand for fossil fuels, which would seek to reduce overall demand for oil, natural gas and coal in Ireland.
- Replacing fossil fuels with renewables, which would seek to reduce the use of gas, oil and coal in Ireland by replacing it with renewable energy sources such as wind energy, solar energy or bioenergy.
- Diversifying fossil fuel supplies, which would seek to replace any Russian supplies of gas, oil and coal (direct or indirect) with supplies from other sources.

The ambitious programme for government is prioritising carbon neutrality and renewable energy generation. In light of this, it is important for the nation to rely on proven technologies such as on-shore wind in order to meet the near and long-term objectives. Furthermore, the National Energy Security Framework underlines the importance of new renewable energy generation projects, such as the Proposed Development, in securing Ireland's energy supply in light of the ongoing conflict in the Ukraine and associated energy supply chain issues leading to shortages and energy price increases.

4.4.10.1 Project Response

The Proposed Development promotes the generation of renewable energy at an appropriate location, and supports the achievement of a low carbon economy by 2050. It seeks to contribute to the nation's target increase of renewable energy from 30% to 80% by 2030 and supports the doubling of onshore wind energy in Ireland by 2030 as set out in the CAP24 and CAP25. The Proposed Development supports national targets of climate change mitigation and reduction in greenhouse gas emissions where significant focus has been set out in the recent *Climate Action and Low Carbon Development (Amendment) Act 2021*.

The Proposed Development seeks to deliver renewable energy at an appropriate location which supports the achievement of a low carbon economy by 2050. The proposed Derrynadarragh Wind Farm is located within an area zoned as being 'Open to consideration' within the Offaly County Development Plan 2021-2027, and 'Acceptable in Principle' within the Kildare County Development Plan 2023-2029.

It is therefore considered that the Proposed Development at Derrynadarragh is in line with national policy and supports the achievement of national energy and sustainability targets.

4.4.11 National Policy and Legislation Conclusion

The development of the proposed Derrynadarragh Wind Farm is in support of national policy as set out above. The project supports the enhancement of the competitiveness of rural areas and facilitates the development and diversification of the rural economy by supporting the energy sector and increasing the share of renewables in Ireland's energy mix.

The proposed development will contribute to the nation's target increase of renewable electricity from 30% to 80% by 2030, and supports the target 9 GW of onshore wind energy in Ireland by 2030 as set out in the Climate Action Plan.

The project supports national targets of climate change mitigation and reduction in greenhouse gas emissions where significant focus has been set out in the recent Climate Action and Low Carbon Development (Amendment) Act 2021 (the "Climate Act"). The ambitious new programme for government is prioritising carbon neutrality and renewable energy generation. In light of this, it is important for the nation to rely on proven technologies such as onshore wind in order to meet the near-term objectives, as well as long-term objectives.

The proposed project promotes the generation of renewable energy at appropriate locations and supports the achievement of a low carbon economy by 2050. It is therefore considered that the proposed Derrynadarragh Wind Farm is in line with national policy and supports the achievement of national energy and sustainability targets.

4.5 Regional Policies

4.5.1 The Eastern and Midlands Regional Spatial & Economic Strategy 2019-2031 (RSES)

The Eastern and Midlands Regional Spatial and Economic Strategy (RSES) was published in June 2019 to support the implementation of the aforementioned NPF and the economic policies and objective of the Government by providing a long-term strategic planning and economic framework for the development of the region.

The RSES remarks:

> *"The Region will need to shift from its reliance on using fossil fuels and natural gas as its main energy source to a more diverse range of low and zero-carbon sources, including renewable energy".*

The RSES states that "Onshore wind, bioenergy, solar and offshore energy" will be required to decarbonise the energy sector for the region. The Strategy notes that:

> *"New energy systems and transmission grids will be necessary for a more distributed, renewable energy focused system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar".*

The strategy also states that decentralisation of energy will be critical for the region to become more self-sufficient in relation to its energy needs and that this will involve a shift from conventional energy supply systems to a more diverse range of low and zero-carbon sources including renewable energy.

A number of chapters within the RSES give specific regional policy objectives (RPOs) which support the development of renewable energy infrastructure such as the proposed development. The following policy objectives are set out within the RSES which are in support of the development of renewable energy projects in the region.

Table 4-5: Key Eastern and Midlands Regional Spatial and Economic Strategy Objectives and Policies

Policy Objective	Description
RPO 4.84	**Rural Areas** Support the rural economy and initiatives in relation to diversification, agri-business, rural tourism and renewable energy so as to sustain the employment opportunities in rural areas. In keeping with the NPF, the Eastern and Midland Regional Assembly (EMRA) will support the longer-term strategic planning for industrial peatland areas. This may include support, where appropriate, for a Transition Team in place and preparation of a comprehensive after-use framework plan for the peatlands and related infrastructure, which addresses environmental, economic and social issues, including employment and replacement enterprise reflecting the current transition from employment based around peat extraction.
RPO 6.9 (bullet point 4)	**Regional Enterprise Plans** Ensure that the Midlands is well positioned to address the challenges posed by the transition to a low carbon economy and renewable energy.
RPO 7.35	**Decarbonizing the Energy Sector** EMRA shall, in conjunction with local authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. The Strategic Energy Zones for the Region will ensure all environmental constraints are addressed in the analysis. A regional landscape strategy could be developed to support delivery of projects within the Strategic Energy Zones.
RPO 10.20	**Energy Infrastructure** Support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the Region and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy. This includes the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity and gas transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and the planning process.

Policy Objective	Description
RPO 10.22 (bullet point 4)	**Energy Infrastructure** 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.

4.5.1.1 Project Response

The development of the proposed Derrynadarragh Wind Farm will aid in meeting the objectives set out in the Eastern and Midlands RSES including diversification of the rural economy, actions against climate change and sustainable development of wind energy at an appropriate location. The proposed Derrynadarragh Wind Farm is located within an area zoned as being 'Open to consideration' within the Offaly County Development Plan 2021-2027, and 'Acceptable in Principle' within the Kildare County Development Plan 2023-2029. Particularly RPO 10.20 and RPO 10.22 focus on both the integration of transmission network and facilitating linkages to renewable energy proposals. The Derrynadarragh proposal will not only deliver a 9 no. turbine scheme, but it will also deliver an on-site 110kV TSO Substation which will connect into the existing Bracklone Substation, thereby supporting and strengthening the National Grid even after the project has been decommissioned.

Assessments conducted and contained within this EIAR demonstrates that the location of the Proposed Development is appropriate, and is based on considerations and assessments related to optimal wind resource availability, technical feasibility for grid connection, land use compatibility, and minimal environmental constraints. The EIAR confirms that the Proposed Development avoids areas of high ecological sensitivity, archaeological and cultural heritage, and is sited to eliminate significant visual impact, while mitigation measures ensure compliance with environmental protection requirements which directly aligns with the RSES within the Eastern and Midlands Region.

4.6 Local Planning Policy

The planning application boundary of the Proposed Development spans across multiple local authorities' administrative boundaries, namely Kildare County Council and Offaly County Council, with the proposed grid route connection also stretching into Laois County Council.

It is a specific planning policy requirement under Section 28 of the Planning & Development Act 2000 (as amended) that in making Development Plans a planning authority has regard to national policy on renewable energy as contained in the aforementioned policy documents. A County Development Plan (CDP) is required to indicate how the implementation of the Development Plan will contribute to realising overall national targets on renewable energy and climate change mitigation. This applies in particular to wind energy production and the potential wind energy resource.

This section of the chapter addresses each of the Local Authority Development Plan's in turn. Please also refer to the Project Planning Statement, submitted as part of this application.

4.6.1 Kildare County Development Plan 2023 - 2029

The Kildare County Development Plan (“Kildare CDP”) 2023-2029, which took effect on 28th January 2023, sets out the strategic framework for land use planning in the county over the plan period up to 2029.

4.6.1.1 Chapter 7 - Energy Communications

Chapter 7 of the Kildare CDP sets out the Energy Communications aim for the County:

> *"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"*

This aim underpins the key policy related to the Proposed Development contained in the County Development Plan. Table 4-6 outlines the Kildare CDP policies, objectives and the project response to each item.

Table 4-6: Kildare County Development Plan Relevant Policies and Objectives

Policy / Objective	Description
REP 12	Objective: *"Ensure that economic and enterprise related development is provided in a manner which facilitates a reduction in greenhouse gas emissions and accelerates the transition towards a sustainable, low carbon and circular economy. The following measures shall be supported:* • *An increase in employment densities within walkable distances of communities and on public transport routes.* • *Promotion of walking and cycling and use of public transport through increased permeability and mobility management 116measures within and outside employment areas* • *The sourcing of power from district heating and renewables including wind and solar. Additional native tree planting and landscaping on existing and proposed enterprise zones and development sites to aid with carbon sequestration, contributing to the green infrastructure network of the County and promoting quality placemaking."* **Project Response** The Proposed Development supports this objective through, when in operation, delivering approx. 64.8 MW of new wind energy per annum. This provides an additional, sustainable and carbon-free source of energy in the Local Authorities administrative area generated which will connect to the grid.
EC P4	Have regard to the Department of the Environment, Heritage and Local Government's 'Guidelines for Planning Authorities on Wind Energy Development' (or any subsequent updates) and the Kildare County Council Wind Energy Strategy when assessing planning applications for wind farms.

Policy / Objective	Description
EC O11	Objective: *"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."* **Project Response** This Proposed Development is applying for permission for the development of 9 Wind Turbines generating approx. 64.8 MW of electricity per annum in an area that Kildare County Council has identified as being a suitable location falling within 'Zone 1 - Acceptable in Principle' for the delivery Wind Farm and related development. Furthermore, environmental sensitivities have been duly considered and included the preparation of this Environmental Impact Assessment Report, which identifies and mitigates any potential impacts arising from the proposed development. As such, with regard to the above objective, in our opinion the Proposed Development should be encouraged and supported by the Planning Authority.
EC O14	Support the establishment of a local Community Benefit Fund as part of any significant wind energy development application, which supports the development of local recreation amenities, provides additional community project funding or community owned Renewable Energy projects.
EC O15	Objective: *"Require applicants to submit a report addressing the issues contained in Section 6 of the County Wind Energy Strategy 'Considerations for Wind Farm Development Planning Applications' at application stage. Decommissioning and site rehabilitation plans shall also be submitted at application stage and shall identify sustainable waste management solutions for wind turbine components (battery storage, blades etc.) at end-of-life in accordance with the waste management hierarchy. The disposal of same to landfill will not generally be permitted."* **Project Response** The documentation (EIAR Chapters 1 to 18) submitted as part of the application for the Proposed Development, address each of the items raised in Section 6 of the County Wind Energy Strategy entitled *'Considerations for Wind Farm Development Planning Applications'.* This is also reviewed within the Planning Statement submitted as part of the evidence base for this application. The required Site Decommissioning and Site Rehabilitation Plans have also been submitted which address the items raised above. As such, this objective has been complied with in full.

Policy / Objective	Description
EC O16	Objective: *"Require comprehensive winter and summer bird and wildlife surveys for all proposed wind farms sites in accordance with EIA, EU Habitats and Species Directives and all other relevant environmental legislation, so that impacts on wildlife can be fully assessed and evaluated and so that appropriate mitigation and adaptation measures can be considered. Turbine design and adaptation should use the best available technology to minimise harm to birds and other wildlife."* **Project Response** The required winter and summer bird and wildlife surveys have been conducted, recorded and reports prepared. They contain information pertaining to bird and wildlife activity for the past two full years. These resources have been used to inform this EIAR and to propose the appropriate mitigation measures outlined within to mitigate against any potential impacts that have been identified. This information has also been presented within EIAR Chapter 10 - Ornithology as part of this Planning Application, allowing the competent authority to conduct its own assessment. As such, this objective has been complied with in its entirety.
EC O66	Objective: *"Facilitate the delivery of necessary integration of transmission network requirements to allow linkages of renewable energy proposals to the electricity transmission grid in a sustainable and timely manner."* **Project Response** The Proposed Development is proposed to be connected to the national grid. A preferred grid connection route is indicated in the documentation submitted as part of this Planning Application which runs through Kildare County Council's, Offaly County Council's and Laois County Council's administrative boundaries. This new grid connection route assists the council in achieving this objective through providing a new, high-quality connection which both reinforces and strengthens existing infrastructure. The project design team arrived at this preferred route option after considering multiple factors including, inter alia, the environment, route length, traffic management, existing utilities, number of HDD crossings along route etc. A total of 5 no. different routes were assessed and the detailed grid route assessment is set out within EIAR Chapter 3 – Site Selection and Alternatives.
EC O70	Objective: *"Facilitate the development of grid reinforcements including grid connections and a trans-boundary network into and through the county and between all adjacent counties. Such projects shall be subject to AA screening and where applicable, Stage 2 AA. The developments will have regard for protected species and provide mitigation and monitoring where applicable."*

Policy / Objective	Description
	Project Response As detailed above, a grid connection route forms part of this Application. This route will span across 3 separate administrative boundaries (Kildare, Offaly and Laois) and therefore, in accordance with the above policy, should be facilitated by the Planning Authority.
EC O72	Objective: "Require that in all new developments, local services such as electricity shall be located underground. Multiple services shall be accommodated in shared strips underground and access covers shall be shared, where possible." **Project Response** All proposed new electrical and communication cabling will be laid underground, in line with the description of development as set out in EIAR Chapter 2 – Description of the Proposed Development. This includes for both the installation of medium voltage cabling between the proposed turbines and the on-site substation, as well as the installation of 11.4km of high voltage electrical and communication cabling between the proposed on-site substation and the Bracklone Substation.
EC O73	Objective: *"Consider the removal of trees (singular or in stands) and hedgerows (in part or in whole) only in circumstances where it can be clearly demonstrated that the removal of hedgerow material and or tree(s) is essential for the provision of energy and cannot be designed out. Where proven, the vegetation is to be replaced with equivalent number, species, variety and size as was in situ. Where non-native species are removed, they will be required to be replaced with native species. In all cases, plants of local provenance are to be planted within 1 year of removal and maintained to establishment to negate the habitat and biodiversity loss within 3 years. Existing vegetative or 'stepping-stone' linkages are to be maintained and improved upon to increase wildlife corridors. Opportunities should be sought to translocate existing species rich hedgerows, where possible, and subject to proper biosecurity protocols."* **Project Response** In order to facilitate the proposed development felling is required to accommodate access to the site, delivery of turbines, and an access track. The trees and hedgerows to be felled will amount to a total of 0.28ha of land, and have been selected following arboriculture review and several design iterations. The appropriate licences will be sought prior to any works being undertaken. As such, the required tree and hedgerow removals are appropriate and required in order to deliver this Wind Farm project. Especially when considering the wind energy delivered to the grid and the assistance in achieving international, national and regional targets. This matter is discussed in further detail in Chapter 9 – Biodiversity.

Policy / Objective	Description
EC P11	Objective: *"Support Ireland's renewable energy commitments outlined in national policy."* **Project Response** The proposed development will deliver approx. 64.8MW of electricity, contributing to the nation's target increase of renewable electricity from 30% to 80% by 2030, and supports the target 9 GW of onshore wind energy in Ireland by 2030 as set out in the Climate Action Plan.
EC T1	Objective: "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." **Project Response** The Proposed Development, subject to planning consent, will deliver approx. 64.8 MW of electricity per annum. This will support the council in its commitment to contribute to the doubling of on-shore wind energy output by 2030.
EC P1	Objective: Reduce our carbon footprint in line with national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emission reductions. **Project Response** The Proposed Development, subject to planning consent, will deliver approx. 64.8 MW or up to c. 175,971 MWh of electricity per annum over the lifetime of the project. Therefore, the Proposed Development offers a significant contribution towards this objective and achieving a reduction in our carbon footprint and greenhouse gas emissions.
EC P2	Objective: "Promote renewable energy use generation and associated electricity grid infrastructure at appropriate locations within the built environment and open countryside to meet national objectives towards achieving a net zero carbon economy by 2050." **Project Response** The proposed development site is located in open countryside, and within an area identified as suitable for wind energy development (as per Council's Wind Energy Strategy).

Policy / Objective	Description
	As such, in accordance with the above objective, this development and the associated ancillary development including a grid connection should be promoted and supported by the council as it is located in an appropriate location and makes a positive contribution towards achieving national targets for a net zero carbon economy by 2050.
EC O4	Support infrastructural renewal and development of electricity and gas networks in the county, subject to safety and amenity requirements, 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. **Project Response** The proposed development proposes to create a new grid connection between the development and the anticipated connection point at Bracklone Substation. This supports this policy objective through developing further electricity infrastructure which is compliant and in accordance with proper planning and sustainable development of the area.
EC O54	Require an Ecological Impact Assessment to be carried out and submitted with any planning application for energy infrastructure projects (e.g., wind and solar developments). **Project Response** This Environmental Impact Assessment Report (EIAR), including associated Appendices address this objective.
EC O55	Estimate an overall carbon balance when evaluating renewable energy project applications on peatlands, especially those proposed for wind or solar projects taking into account the lifetime of the project versus the potential carbon sequestration over 1000s of years of a site once rehabilitated fully. **Project Response** In total, it is estimated that 104,731 tonnes of CO2 will be displaced over the proposed 35 year lifetime of the proposed Derrynadarragh Wind Farm, which equates to 2,992 tonnes of CO2 per annum. The carbon balance is addressed in more detail at Section 7.4.4 of Chapter 7 – Air and Climate of the EIAR.

Policy / Objective	Description
EC O57	Ensure that renewable energy projects located on or near peatlands do not negatively impact on any rehabilitation measures including enhanced rehabilitation measures (i.e. blocking and re-wetting). **Project Response** The redline boundary of the proposed development principally comprises agricultural farmland with areas of peatland located within the site to the north and south. The proposed development will not negatively impact on any rehabilitation measures and will make a contribution to same, if appropriate. This item is further detailed and addressed through Chapter 11: Soils, Geology and Hydrogeology.

4.6.1.2 Chapter 5: Sustainable Mobility and Transport

Chapter 5 of the Development Plan outlines the Councils policies and objectives related to traffic and transport across the county.

Table 4-7: Kildare County Development Plan Relevant Chapter 5 Policies and Objectives

Policy / Objective	Description
TM P12	Support the safe and efficient navigation of aircrafts throughout the County.
TM O5	Encourage the use of materials and engineering solutions that optimise natural surface water drainage as part of Sustainable Urban Drainage Systems (SUDS) with all new active travel, public transport, parking, road and street developments and ensure adequate replacement and additional planting of pollinator-friendly and native species.
TM O72	Implement the requirements of S.I. No. 140 of 2006 Environmental Noise Regulations and the recommendations of the Kildare Noise Action Plan 2019-2023, to seek to reduce, where necessary, the harmful effects of traffic noise, through appropriate mitigation measures that meet the best environmental options.
TM O74	Mitigating the negative impacts of infrastructure by incorporating wildlife crossings/underpasses and fish culverts in the instance of freshwater European Sites into the designs for new road infrastructure and where possible, by incorporating such measures into the existing road network (as appropriate)
TM O89	Avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 50kph apply as set out in the Spatial Planning and National Roads Guidelines, DECLG (2012).

Policy / Objective	Description
TM O95	Restrict new access onto regional roads where the 80km per hour speed limit currently applies, except in the following exceptional circumstances: • Developments of strategic, local, regional or national importance, where there is a significant gain to the county through employment creation or other economic benefit. • Where applicants comply with Schedule of Local Need Criteria (see Chapter 3), are proposing to build a home on their family landholding and cannot provide access onto a nearby county road. In this instance, applicants will only be permitted to maximise the potential of existing entrances. The onus will be on the applicant(s) to demonstrate that there are no other accesses or suitable sites within the family landholding. • Where it is proposed to demolish an existing dwelling and replace with a new dwelling, where there is an existing entrance onto the regional road.
TM O102	Minimise the extent of hedgerow removal in order to achieve adequate sightlines. However, where it has been satisfactorily demonstrated that there is no other suitable development site (for planning reasons) any removed hedgerow shall be replaced with native hedgerow species. Opportunities should be sought to translocate existing species rich hedgerows, where possible, and subject to proper biosecurity protocols.
TM 0133	Consult with the Irish Aviation Authority in regard to applications in the vicinity of aerodromes, and in regard to developments that may exceed 45 metres in height above ground level, or 45m above the aerodrome's datum level, or where it is considered appropriate
TM 0134	Refer, where appropriate, proposed wind farm development applications located within MOA4 (as per Map 5.2) and refer proposed solar farm development applications located within 3km of the Curragh Camp to the Department of Defence.

Project Response

With regards to Policy TM P12 and the safe and efficient navigation of aircrafts, of particular relevance is Section 5.13.6 of the Kildare LDP which states:

> *"Wind turbines and wind farms can be en-route hazards to aviation, especially in the vicinity of an aerodrome, or on its approaches, or on elevated ground. They can also interfere with navigational and broadcasting equipment, including radar. All turbines determined to be obstacles to aviation after aviation study (including, per IAA guidance, any in excess of 90m above ground) must be provided with aviation warning obstacle lights in accordance with ICAO (or EASA) requirements and must be identified on aviation charts. Additional lighting provisions will be necessary for turbines extending above 150m, and infra-red lighting – compatible with night-vision goggles – will generally be required in Military Operating Areas."*

On review of the Aviation Assessment prepared by AI Bridges, it is confirmed that the proposed wind farm would not have an impact on flight lines or communication aids:

- The proposed wind farm is situated outside the Outer Horizontal Surface and there is no penetration of the take-off or approach surfaces, it is unlikely that there will be any impacts to the OLS surfaces for Dublin Airport.
- Following a review of" Terrain and obstacle requirements Area 1" as defined in ICAO Annex 15, the proposed wind turbines need to be registered if they are more than 100 meters above terrain. From the centre point (ARP – Airport Reference Point) of Dublin Airport to the boundary of the Area 1 of the Annex 15 Aerodrome Surface is 45 km. This area encloses the TMA area i.e. Total Manoeuvring Area and this is used for circling and manoeuvring by aircraft. Should the proposed windfarm be permitted, the turbines would be outside 45km of Dublin Airport's ARP and would not cause an impact on the Annex 15 Aerodrome Surface.
- As the proposed wind farm is approximately 60 km from the Localizer and transmitting antennas at Dublin Airport, it is very unlikely that wind turbines at the proposed development will have any impact on these ATS communications and radio navigational aids.
- For Radar Surveillance Systems, EUROCONTROL Guidelines require a 16 km safe distance from the surveillance radar system (SSR), for a "Zone 4 - No Assessment" condition. It has been highlighted in the analysis that turbines located at the proposed farm would be located at a minimum distance of 62 km from the radar station at Dublin Airport and in Assessment Zone 4 of the EUROCONTROL Guidelines. As turbines at the proposed development would be located in Assessment Zone 4, a detailed impact assessment on Radar Surveillance Systems will not be required by the IAA.

Chapter 14 of this EIAR focuses on traffic and transport, with regards to access the new main site access to the site will be taken from a Regional Road (R419). In line with Policy TM O95, the policy seeks to restrict new access to regional roads and will only allow this in exceptional circumstances such as strategic, local, regional or national importance, or where there is a significant gain to the county through employment creation or other economic benefit. This proposal is strategically important not just locally, but right up to a national level as it will help to meet the national renewable targets by 2030.

4.6.1.3 Chapter 9: Our Rural Economy

Chapter 9 outlines the Council's policies and objectives relating to the rural economy and communities.

Table 4-8: Kildare County Development Plan Relevant Chapter 9 Policies and Objectives

Policy / Objective	Description
RD P1	Support and promote rural enterprises and encourage appropriate expansion and diversification in areas such as sustainable agriculture, forestry, peatlands, peatlands rehabilitation and sustainable peatland related tourism, food, crafts, renewable energy at suitable locations in the county, particularly where they contribute to a low carbon and resilient economy.
RD O7	Support the development of renewable energy production in rural areas where appropriate.
RD O39	Protect peatlands from inappropriate development having regard to the Wind Energy Strategy for County Kildare (see Appendix 2).

Project Response

Continued economic growth in Kildare supports job creation, improves standards of living, and provides resources for public services like healthcare and education. As the economy expands it attracts investment from businesses generating more jobs, income opportunities, and better infrastructure. Given its importance, Kildare County Council has developed a series of targets, policies and objectives to promote continued economic growth and enhance sustainability across the economy in the County.

The Proposed Development aligns with the CCDP policy objectives of fostering economic growth, creating employment opportunities, sustainability and resilience. The construction and operation of the wind farm will create jobs in the local community, both directly in terms of construction and maintenance, and indirectly through the increased economic activity associated with such a large infrastructure project.

It also enhances sustainability, energy security and resilience in county Kildare. By diversifying the local energy mix and increasing the proportion or locally-generated renewable energy, the Proposed Development will reduce reliance on imported fossil fuels, reduce the emission of Greenhouse Gases and improve the stability of the local energy supply. This aligns with Policy RD O7 by supporting renewable energy delivery and production in an appropriate rural location, and creating a resilient and low carbon economy.

Due to the location of the proposed site adjacent to cutaway bogs and peatlands, we are aware of Policies RD O39 and the Kildare Wind Energy Strategy and confirm that the proposed design of the Derrynadarragh Wind Farm has taken into account all surrounding hydrological connections to European sites and shall not affect drainage of surrounding lands. It is important to flag that we are not proposing development on either cutaway bog or peatlands. The design of the scheme has sought to avoid peatland areas, and focuses on the development of existing agricultural land, forestry areas, and existing roadways.

4.6.1.4 Chapter 11: Built and Cultural Heritage

Chapter 11 outlines the Councils policies and objectives relating to cultural heritage and the built environment.

Table 4-9: Kildare County Development Plan Relevant Chapter 11 Policies and Objectives

Policy / Objective	Description
AH P2	Protect and enhance archaeological sites, monuments and where appropriate and following detailed assessment, their setting, including those that are listed in the Record of Monuments and Places (RMP) or newly discovered archaeological sites and/or sub-surface and underwater archaeological remains.
AH O2	Manage development in a manner that protects and conserves the archaeological heritage of County Kildare, avoids adverse impacts on sites, monuments, features or objects of significant historical or archaeological interest and secures the preservation in-situ or by record of all sites and features of historical and archaeological interest, including underwater cultural heritage. The Council will favour preservation in – situ in accordance with the recommendation of the Framework and Principles for the Protection of Archaeological Heritage (1999) and the Council will seek and have regard to the advice and recommendations of the Department of Housing, Local Government and Heritage.
AH O4	Ensure that development in the vicinity of a site of archaeological interest is not detrimental to the character of the archaeological site or its setting by reason of its location, scale, bulk or detailing and to ensure that such proposed developments are subject to an archaeological assessment prepared by a suitably qualified archaeologist. Such an assessment will seek to ensure that the development can be sited and designed in such a way as to avoid impacting on archaeological heritage that is of significant interest including previously unknown sites, features, objects and areas of underwater archaeological heritage.

Project Response

Built and cultural heritage is of significance nationally, regionally and locally. It supports, protects and restores important historical and recent features of significance which are immersed amongst the wider built and unbuilt landscape. These features contribute to our sense of place whilst also serving as indications to past architectural and cultural styles and identities and acting as a source of fascination, inspiration and pride for future generations. As such, the Development Plan outlines a series of policies and objectives aimed at protecting and enhancing these important sites, monuments and features.

The sites redline boundary abuts a zone of notification for a feature listed on the Record of Monuments and Places. The recorded site, which falls outside of the redline boundary for the Proposed Development, is identified as an enclosure. The Historic environment viewer tool from the Department of Housing, Local Government and Heritage describes the protected site as:

> *"as the cropmark of a possible oval enclosure. In reclaimed pasture at the E-edge of Derrylea Bog. The cropmark was not visible at ground level in 1986 (SMR file)."*

Turbine 1 is the closest at a distance of 130m to the north, which falls firmly outside the Zone of Notification and recorded site exclusion zone of 60m under the relevant policy. Furthermore, none of the ancillary infrastructure or grid connection routing intrude on the site or fall within the Zone of Notification. Chapter 15 of the EIAR focuses on Cultural Heritage, and the archaeological consultant notes that having undertaken site visit and walkover that there are no surface traces of any potential cultural heritage features identified during the inspection of the location. As such, it can be concluded that the Proposed Development has protected the recorded asset and actively avoids through design as to not have adverse impacts on sites, monuments, features or objects of significant historical or archaeological interest.

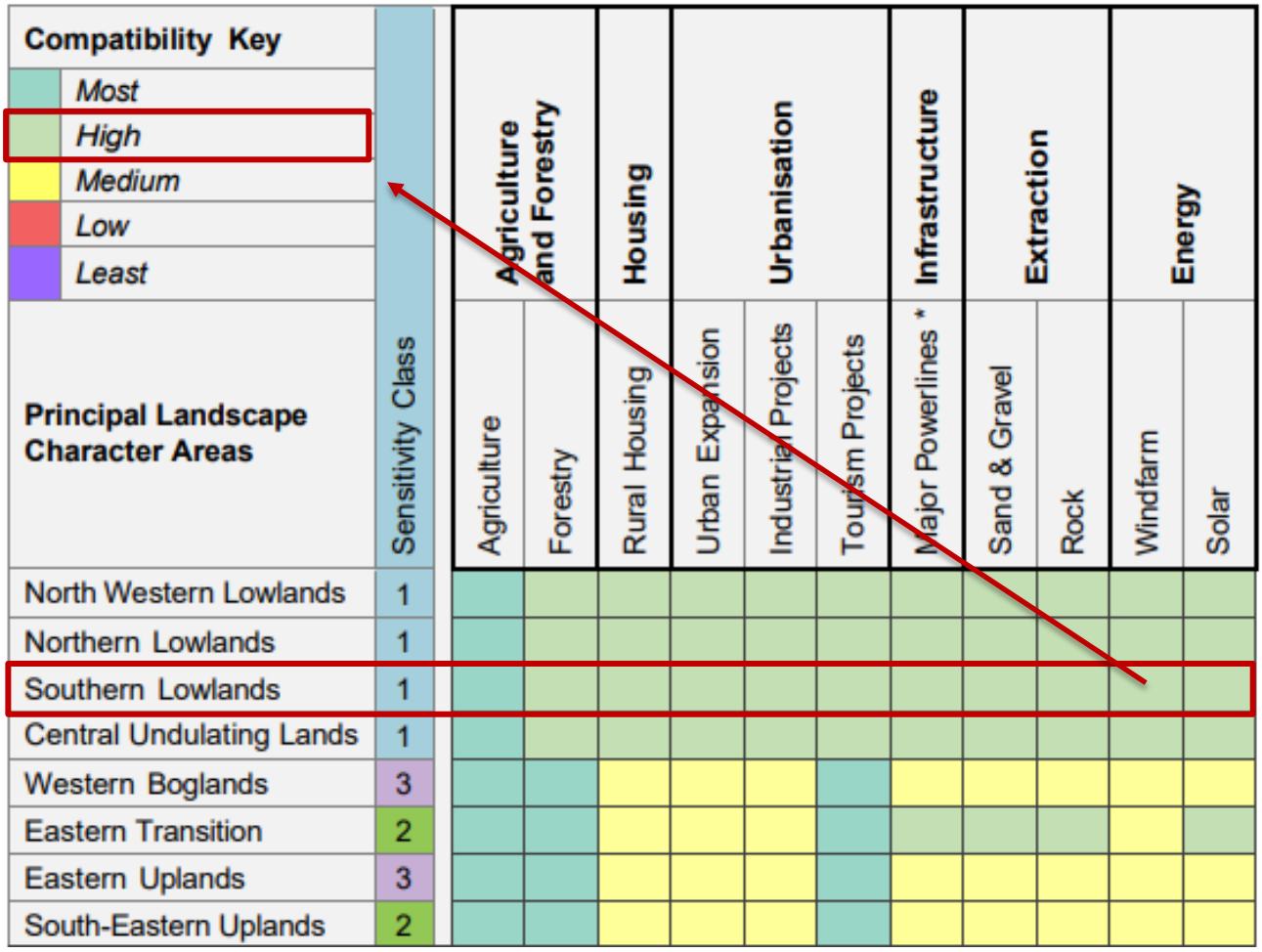
Prior to construction, a suitably qualified archaeologist will be appointed to carry out a programme of pre-construction test trenching at the locations of the turbines, hardstands, onsite substation, temporary compound and site access tracks within the Site. This site investigation will be carried out under licence by the National Monuments Service, Department of Housing, Local Government and Heritage. In the event that any sub-surface archaeological features are identified during these site investigations they will be recorded by the appointed archaeologist and will then be securely cordoned off while the National Monuments Service are consulted to determine further appropriate mitigation measures, which may include preservation in situ (by avoidance) or preservation by record (archaeological excavation). Please refer to EIAR Chapter 15 - Cultural Heritage for further details.

4.6.1.5 Chapter 13: Landscape, Recreation and Amenity

Chapter 13 of the Development Plan focuses on Landscape, with Section 13.3.1 and Section 13.3.2 of particular relevance to the project as they classify the sensitivity of the landscape and the impacts of different classes of development on same.

Sensitivity of Principal Landscape Character Assessment (Dominant Sensitivity Outlined)	Class 1 Low Sensitivity	Class 2 Medium Sensitivity	Class 3 High Sensitivity	Class 4 Special Sensitivity	Class 5 Unique Sensitivity
North Western Lowlands	Class 1				
Northern Lowlands	Class 1				
Central Undulating Lands	Class 1				
Western Boglands			Class 3		
Southern Lowlands	Class 1				

Plate 4-2: An extract of 'Table 13.1 - Landscape Sensitivity Classification to Landscape Character Areas' contained in the Kildare County Development Plan 2023 - 2029 with the area of the subject site outlined in red. (Source: Kildare County Development Plan 2023 - 2029, annotated by Fehily Timoney and Company 2025.)



Compatibility Key	Sensitivity Class	Agriculture and Forestry		Housing	Urbanisation			Infrastructure	Extraction		Energy	
Most												
High												
Medium												
Low												
Least												
Principal Landscape Character Areas		Agriculture	Forestry	Rural Housing	Urban Expansion	Industrial Projects	Tourism Projects	Major Powerlines *	Sand & Gravel	Rock	Windfarm	Solar
North Western Lowlands	1											
Northern Lowlands	1											
Southern Lowlands	1											
Central Undulating Lands	1											
Western Boglands	3											
Eastern Transition	2											
Eastern Uplands	3											
South-Eastern Uplands	2											

Plate 4-3: **An extract of 'Table 13.3 - Likely compatability between a range of land-uses and Principle Landscape Areas' from the Kildare County Development Plan 2023 -2029 with the area of the subject site outlined in red. (Source: Kildare County Development Plan 2023 - 2029, annotated by Fehily Timoney and Company 2025.)**

	Agriculture and Forestry		Housing	Urbanisation			infrastructure	Extraction		Energy	
5 - Likely to be very compatible in most circumstances. 4 - Likely to be compatible with reasonable care. 3 - Likely to be compatible with great care. 2 - Compatible only in certain circumstances. 1 - Compatible only in exceptional circumstances. 0 - Very unlikely to be compatible.	Agriculture	Forestry	Rural Housing	Urban Expansion	Industrial Projects	Tourism Projects	Major Powerlines	Sand and Gravel	Rock	Windfarm	Solar
Proximity within 300m of Principal Landscape Sensitivity Factors.											
Major Rivers and Water bodies	5	5	2	2	2	3	2	1	0	1	0
Canals	5	5	2	2	2	3	2	1	0	1	1
Ridgelines	5	5	1	1	1	1	1	0	0	2	0
Green Urban Areas	4	5	2	0	0	[illegible]	3	3	3	2	2
Broad-Leaved Forestry	3	5	2	2	2	4	3	2	3	1	2
Mixed Forestry	3	5	2	2	2	4	3	2	3	1	2
Natural Grasslands	5	2	2	1	1	4	2	1	1	2	2
Moors and Heathlands	2	2	1	0	0	1	2	1	0	2	1
Agricultural Land with Natural Vegetation	5	5	2	2	2	3	3	3	3	4	2
Peat Bogs	0	0	0	0	0	3	2	0	0	2	1
Scenic View	5	5	2	1	1	5	1	3	0	0	2
Scenic Route	5	5	2	1	1	5	1	3	0	0	2

Plate 4-4: **An extract of Table 13.4 - Likely compatability between a range of land-uses and proximity to Prinicpal Landscape Sensitivty Factors contained in the Kildare County Development Plan 2023 - 2029. (Source: Kildare County Development Plan 2023 - 2029, annotated by Fehily Timoney and Company, 2025.)**

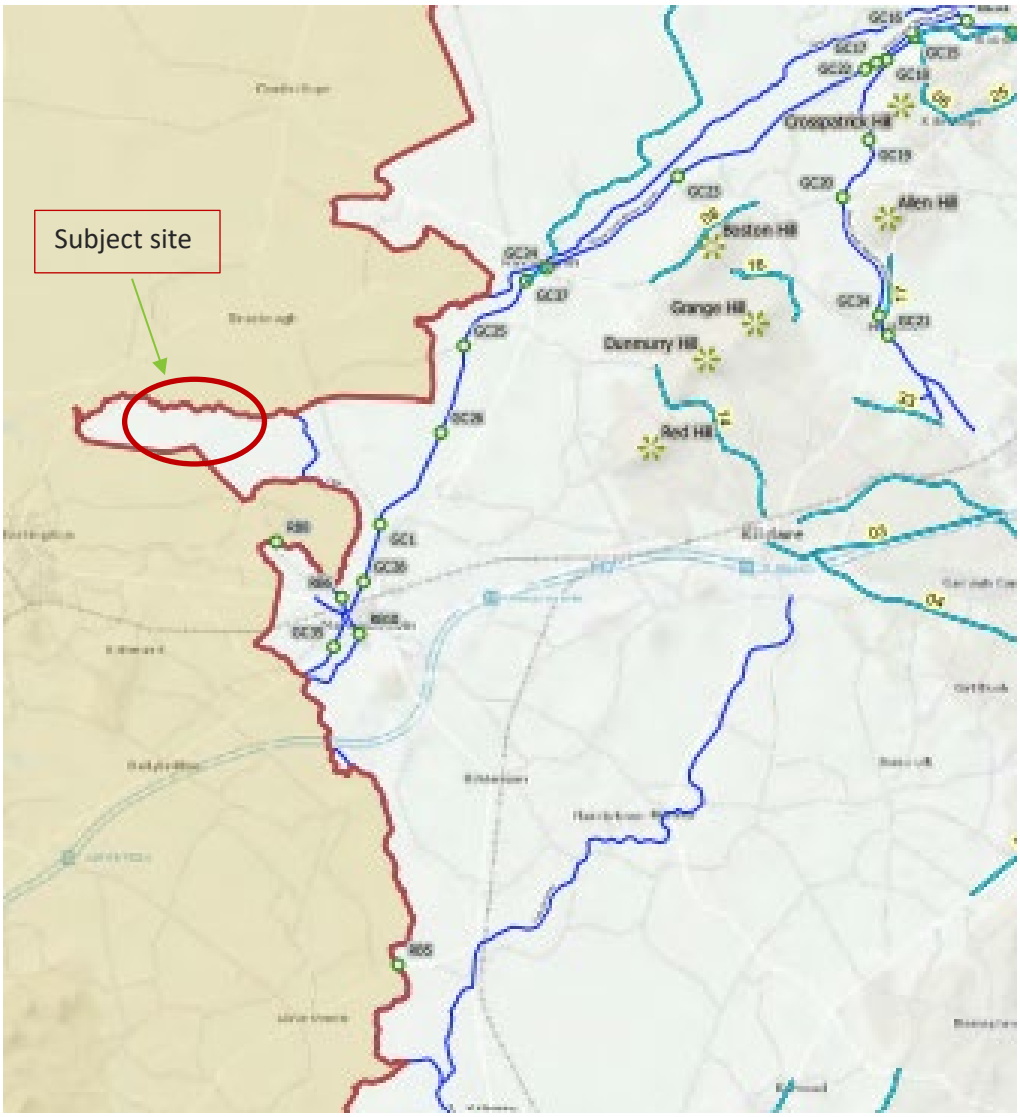


Plate 4-5: An extract of the Map illustrating the Scenic Routes and Viewpoints on page 466 of the Kildare County Development Plan 2023 - 2029. (Source: Kildare County Development Plan 2023 - 2029, annotated by Fehily Timoney and Company, 2025.)

Table 4-10: Kildare County Development Plan Relevant Chapter 13 Policies and Objectives

Policy / Objective	Description
LR P1	Protect and enhance the county's landscape, by ensuring that development retains, protects and, where necessary, enhances the appearance and character of the existing local landscape.
LR O2	Require a Landscape/Visual Impact Assessment to accompany proposals that are likely to significantly affect: • Landscape Sensitivity Factors; • A Class 4 or 5 Sensitivity Landscape (i.e. within 500m of the boundary); • A route or view identified in Map V1 - 13.3 (i.e. within 500m of the site boundary). • All Wind Farm development applications irrespective of location, shall be required to be accompanied by a detailed Landscape/Visual Impact Assessment including a series of photomontages at locations to be agreed with the Planning Authority, including from scenic routes and views identified in Chapter 13.
LR O26	Contribute towards the protection of waterbodies and watercourses, including rivers, streams, associated undeveloped riparian strips, wetlands and natural floodplains, from inappropriate development. This will include buffers free of development in riverine and wetland areas, as per Chapter 12.
LR P3	Protect, sustain and enhance the established appearance and character of all important views and prospects.
LR O32	Avoid any development that could disrupt the vistas or have a disproportionate impact on the landscape character of the area, particularly upland views, river views, canal views, views across the Curragh, views of historical or cultural significance (including buildings and townscapes), views of natural beauty and specifically those views listed in Tables 13.5 – 13.7 of this plan.

Project Response

It is important to note that the 4 no. southernmost turbines are located within the jurisdiction of County Kildare. The Proposed Development falls within the 'Southern Lowlands' LCA. The Proposed Development is in keeping with the Development Plan as the subject site falls within the landscape character area of 'Class 1 - low sensitivity', which is identified as an area with high compatibility for Wind Energy development (as identified in the Plates above).

In line with Policies LR P1 and LR O2, an LVIA was carried out to inform the design and layout of the Proposed Development and guide the siting of the turbines and electrical infrastructure with regard to landscape and visual amenity. To accompany the LVIA, and also included in this planning application, Zone of Theoretical Visibility (ZTV) mapping (see EIAR Chapter 16 and Appendix 16.1) has been prepared for the Proposed Development using visual receptors such as scenic routes, the road network and residential and commercial receptors or settlements within proximity of the Proposed development.

In consideration of the above Policy Objective LR P3 regarding Views and Prospects, and the Proposed Development site in relation to its surrounds, this EIAR considers factors such as the visibility of the turbines from key viewpoints and considers their cumulative visual impact with other wind farms within 20 km of the Proposed Development site. For this, a comprehensive Landscape and Visual Assessment (LVIA) of the Proposed Development has been conducted by Macroworks, and has been submitted with this planning application. The Proposed Development is located within proximity to a number of scenic viewpoints and routes identified in Plate 4-5 above. These are viewpoints GC25, GC26, GC1, and RB8. These views all represent various bridges along the Grand Canal and River Barrow. The Barrow line of the Grand Canal traverses the Central Study Area in a general south-northeast direction coming within 3.5km east of the Site. The Kildare CDP states that susceptible views are considered to be: "to and from bridges on the Grand Canal" and "Views of the River Barrow from bridges, adjacent lands and roads.". The banks of the canal and River Barrow are generally densely vegetated, which often serves to screen background views. The character and associated landscape value of the canal corridor are largely confined to the canal itself and its towpaths, which although tranquil and exhibiting some degree of natural character, these corridors are not considered particularly sensitive landscape features beyond their immediate setting. While both the Grand Canal and River Barrow are notable landscape features, their value is localised and not considered especially influential in shaping the wider landscape character. On balance of the reasons outlined above, whilst the landscape associated with the Grand Canal and River Barrow corridors are considered to have a comparatively higher landscape sensitivity (High-Medium), the landscape sensitivity of the Central Study Area is deemed to have a predominant Medium-Low sensitivity.

In Kildare, the proposed turbines are contained entirely within a 'Low' sensitivity area. This reinforces that the landscape is robust and has the capacity to accommodate new development. Although there are some areas of increased sensitivity, such as the River Barrow and Grand Canal, as forementioned these are localised features. The overwhelming majority of the Central Study Area (refer to Chapter 16 - LVIA), within 20km of site boundary, comprises a highly modified working landscape, with low sensitivity prevailing across much of the county.

With regards to the location of the Proposed Development site at Derrynadarragh, all aspects related to the landscape and the suitability of the Proposed Development at the identified location are addressed at Chapter 16 – Landscape and Visual Impact Assessment. As identified in the Landscape and Visual Impact Assessment accompanying this Application, it is considered that the Development will have a modest physical impact on the landscape within the Site, because none of the proposed features are considered to have an extensive physical 'footprint'. The LVIA, prepared by Macroworks, concludes that based on the landscape, visual and cumulative assessment contained herein, it is considered that there will not be any significant landscape effects, visual effects or cumulative effects arising from the proposed Derrynadarragh Wind Farm.

Policy LR O26 seeks the protection of watercourses and waterbodies. The Cushina River flows through the Wind Farm site, and Daingean River flows through an identified TDR node. The design of this proposal incorporates a 50m buffer zone along the Cushina River within the red line boundary of the site, and seeks to preserve existing natural features and implement habitat restoration along the riverbed. For further details on the preservations of habitat please see Chapter 9 - Biodiversity, and the Biodiversity Environmental Management Plan (BEMP).

Furthermore, the Proposed Development has been designed to minimise visual impact and preserve the visual amenity of the area. By conducting thorough environmental assessments and engaging with local stakeholders as contained within this accompanying EIAR, the Proposed Development ensures that it integrates as far as possible with the surrounding landscape. This approach supports the Development Plan objectives, outlined above, of protecting and enhancing the county's landscape.

4.6.1.6 Chapter 12: Biodiversity and Green Infrastructure

Given the significance of biodiversity, legislation protecting flora and fauna, climate change and the natural environment the Development Plan outlines extensive policies in relation to all of the above topics. These are outlined in Table 4-11 below, with a project response for each item being addressed in turn.

Table 4-11: Kildare County Development Plan Relevant Chapter 12 Policies and Objectives

Policies / Description	Description
BI P1	Integrate in the development management process the protection and enhancement of biodiversity and landscape features by applying the mitigation hierarchy to potential adverse impacts on important ecological features (whether designated or not), i.e. avoiding impacts where possible, minimising adverse impacts, and if significant effects are unavoidable by including mitigation and/or compensation measures, as appropriate. Opportunities for biodiversity net gain are encouraged. **Project Response** The Proposed Development has had due regard to the above-mentioned mitigation hierarchy and avoided likely significant effects in so much as possible. Where impacts are anticipated to occur, mitigation measures have been applied to sufficiently address same. Furthermore, the project contributes positively to the environment in the form of a biodiversity net gain. Please refer to Chapter 9: Biodiversity and Natura Impact Statement for further information.
BI O1	Require, as part of the Development Management Process, the preparation of Ecological Impact Assessments that adequately assess the biodiversity resource within proposed development sites, to avoid habitat loss and fragmentation and to integrate this biodiversity resource into the design and layout of new development and to increase biodiversity within the proposed development. Such assessments shall be carried out in line with the CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. **Project Response** The Proposed Development has complied with the above-mentioned policy objective through the preparation and submission of this Environmental Impact Assessment Report in accordance with CIEEM (2018) Guidelines. Please refer to Chapter 9 – Biodiversity; Chapter 3 - Site Selection and Alternatives and Appendix 2.2 – Biodiversity Enhancement Management Plan (BEMP) for further details.

Policies / Description	Description
BI O2	Require, wherever possible, the retention and creation of green corridors within and between built up urban areas and industrial scale developments to protect wildlife habitat value including areas that are not subject to public access. **Project Response** The Proposed Development has complied with the above-mentioned policy objective through the number of Biodiversity Enhancement measures, Please refer to Appendix 2.2 – Biodiversity Enhancement Management Plan (BEMP) for further details.
BI O5	Move towards no net loss of biodiversity through strategies, plan, mitigation measures, appropriate offsetting and/or investment in Blue/Green infrastructure. **Project Response** The Proposed Development contributes positively to the surrounding environment in the form of an overall biodiversity net gain which is achieved through replanting and biodiversity enhancement measures. As such, this objective has been achieved. Please refer to Chapter 9: Biodiversity and BEMP for further information.
BI O6	Apply the precautionary principle in relation to proposed developments in environmentally sensitive areas to ensure that all potential adverse impacts on a designated NHA or Natura 2000 Site arising from any proposed development or land use activity are avoided, remedied, or mitigated. **Project Response** The Proposed Development is located in an area with a potential hydrological connection to the River Barrow and River Nore SAC, with the grid connection route passing through this at one point. This has been assessed without any potential significant impacts identified with the implementation of mitigations. Please refer to Natura Impact Statement.
BI O9 BI O10	BI O9: Avoid development that would adversely affect the integrity of any Natura 2000 site and promote favourable conservation status of habitats and protected species including those listed under the Birds Directive, the Wildlife Acts and the Habitats Directive, to support the conservation and enhancement of Natura 2000 Sites including any additional sites that may be proposed for designation during the period of this Plan and protect the Natura 2000 network from any plans and projects that are likely to have a significant effect on the coherence or integrity of a Natura 2000 Site.

Policies / Description	Description
	BI O10: Ensure an Appropriate Assessment Screening, in accordance with Article 6(3) and Article 6(4) of the Habitats Directive, Section 177A of the Planning and Development Act (2001-2022) or any superseding legislation and with DEHLG guidance (2009), is carried out in respect of any plan or project not directly connected with or necessary to the management of a Natura 2000 site to determine the likelihood of the plan or project having a significant effect on a Natura 2000 site, either individually or in combination with other plans or projects and to ensure that projects which may give rise to significant cumulative, direct, indirect or secondary impacts on Natura 2000 sites will not be permitted (either individually or in combination with other plans or projects) unless for reasons of overriding public interest. **Project Response** In accordance with Article 6(3) and Article 6(4) of the Habitats Directive and Section 177A of the Planning and Development Act 2001 - 2024, the Proposed Development has prepared an Appropriate Assessment Screening which determined that the preparation of a Natura Impact Statement (NIS) is required in this context. As such, this has been undertaken and submitted as part of the planning application documentation - refer to Natura Impact Statement. The NIS identifies all impacts of the Proposed Development on any Natura 2000 sites and, as appropriate, proposes sufficient mitigation measures to avoid any adverse effects on protected sites or species. This supports the Council's policies above, aimed at supporting the conservation and enhancement of same, thus aligning to the Development Plan. Please refer to the NIS document for further information.
BI O15 BI O16 BI O18	BI O15: Ensure that any new development proposal does not have a significant adverse impact on rare and threatened species, including those protected under the Wildlife Acts 1976 and 2012, the Birds Directive 1979 the Habitats Directive 1992 and the Flora Protection Order species and any species listed under the national red lists or that could be listed on a national red list. BI O16: Ensure appropriate species and habitat avoidance and mitigation measures are incorporated into all new development proposals. BI O18: Require all applications for new developments to identify, protect and sensitively enhance the most important ecological features and habitats, and incorporate these into the overall open space network, keeping free from development and to provide links to the wider Green Infrastructure network as an essential part of the design process and by making provision for local biodiversity (e.g. through provision of swift boxes or towers, bat roost sites, hedgehog highways, green roofs, etc.). **Project Response** The Proposed Development has been prepared in full compliance with biodiversity protection objectives BI O15, BI O16, and BI O18, and adheres to relevant Irish and EU legislation, including:

Policies / Description	Description
	• Wildlife Acts 1976 to 2023 • Birds Directive (2009/147/EC) • Habitats Directive (92/43/EEC) • Flora Protection Order 2015 • European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011) Ecological surveys has been undertaken to identify sensitive and protected species and habitats please refer to Chapter 9 Biodiversity and Chapter 10 Ornithology. The design has been specifically laid out to avoid know ecological constraints on site such known Badger setts, with a 50m exclusion zone applied around each sett. Bat buffer zones have been incorporated, with removal of features around each turbine to reduce disturbance and collision risk. All felling and hedge removal will be scheduled outside of the bird nesting season (March to August) to avoid impacts on breeding birds. A pre-construction ecological surveys will be carried out prior to any site works to confirm the presence or absence of sensitive species, with additional measures to be implement if necessary. Please refer to Chapter 9, Chapter 10, Appendix 2.1 Construction Environmental Management Plan (CEMP). The design integrates important ecological features into the open space network, ensuring connectivity with the wider Green Infrastructure (GI), The follow is a sample of the various measures: • Creation of a 2.7-hectare Riparian woodland Protection Zone along the Cushina River, preserving and enhancing riparian habitats. • Installation of in-ditch wetlands on drains feeding into the Cushina River, improving existing water quality, and supporting aquatic biodiversity. Please refer Appendix 2.2 Biodiversity Enhancement Management Plan (BEMP) for a full list and details of Biodiversity Enhancement measures.

Policies / Description	Description
BI O29 BI O30	BI O29: Require the undertaking of a comprehensive tree survey carried out by a suitably qualified arborist where development proposals require felling of mature trees; the tree survey shall assess the condition, ecological and amenity value of the tree stock proposed for removal as well as mitigation planting and a management scheme. It should be noted that rotting and decaying trees are an integral part of a woodland ecosystem and can host a range of fungi and invertebrates, important for biodiversity. While single or avenue trees that are decaying may be removed, others that are part of group or cluster may be subject to retention. BI O30: Ensure a Tree Management Plan is provided to ensure that trees are adequately protected during development and incorporated into the design of new developments. **Project Response** The Proposed Development, after careful consideration and assessment of alternative options as set out at Chapter 3 -Site Selection and Alternatives, requires some felling surrounding the location of Turbines 2 & 6 to facilitate the siting of turbine hardstanding and access tracks. As such, a suitably qualified arborist was retained as part of the EIAR project team to undertake the requisite Tree Survey in line with the relevant legislation and policy objectives.

Policies / Description	Description
BI P7 BI O37 BI O41 BI O45	BI P7: Recognise and promote inland waters, natural environmental assets and to protect rivers, streams and other watercourses and, wherever possible, maintain them in an open state capable of providing suitable habitats for fauna and flora while discouraging culverting or realignment BI O37: Ensure the protection of rivers, streams and other watercourses and, wherever possible, maintain them in an open state capable of providing suitable habitats for fauna and flora while discouraging culverting or realignment. Endeavour to re-open previously culverted streams and watercourses through any future development/redevelopment proposals. BI O41: Maintain riparian buffer zones and potential uses as identified in Table 12.4 when considering potential development and proposed development layouts within or adjacent to waterways BI O45: Ensure that any runoff from developed areas does not result in any deterioration of downstream watercourses or habitats and require that pollution generated by a development is treated within the development area prior to discharge to local watercourses. **Project Response** The Proposed Development has ensured the protection and watercourses in the vicinity of the redline boundary of the site. This has been achieved through, *inter alia*, extensive surveying and assessment to develop an understanding of the areas hydrology and to provide detailed information to facilitate the competent authority in conducting its assessment, implementation of Riparian Buffer Zones around waterbodies (rivers, streams, etc), and identification of potential impacts and proposing mitigation measures as necessary to avoid such impacts. These measures are evidenced throughout the drawings and documentation accompanying this Planning Application. Please refer to Chapter 11: Soils, Geology and Hydrogeology and Chapter 12: Hydrology and Water Quality for further information.
BI P8	Ensure that Kildare's wetlands and watercourses are retained for their biodiversity, climate change mitigation properties and flood protection values and at a minimum to achieve and maintain at least good ecological status for all wetlands and watercourses in the county by, at the latest, 2027 in line with the Water Framework Directive and Ramsar Convention. **Project Response** The Proposed Development has had due regard to any wetland or watercourses through conducting detailed surveying and assessments of such resources in the vicinity of the project, identifying any potential significant impacts and proposing various mitigation measures. Please refer to Chapter 11: Soils, Geology and Hydrogeology and Chapter 12: Hydrology and Water Quality for further information.

4.6.1.7 Kildare Wind Energy Strategy (Appendix 2 of CDP)

The Wind Energy Strategy forms Appendix 2 of the current Kildare County Development Plan 2023 - 2029.

The Wind Energy Strategy recognises how important of a resource wind energy is to Ireland having one of the most advantageous wind regimes in Europe. The report describes how we are at a "cross-roads" in terms of planning the development of our future energy markets. It is acknowledged that relying on the old ways of imported fossil fuels creates problems associated with climate change as well as volatile fuel markets. Wind Energy, on the other hand, would offer a low-carbon, indigenous energy supply which would allow us to have better control over the pricing of energy in the country. Such an indigenous supply would be insulated from the volatile pricing associated with fossil fuels which fluctuates according to geopolitical event, global health scares such as the COVID-19 pandemic, and global supply-and-demand trends.

The Wind Energy Strategy takes a stepwise approach to assigning "strategy zones" across the county of Kildare. The strategy zones are:

- Zone 1 - Acceptable in principle
- Zone 2 - Open to consideration
- Zone 3 - Not normally permissible

In order to identify these zones the Council undertook the following steps:

Table 4-12: Stepwise process to identifying strategy zones for wind energy development

Policy / Objective	Description
Step 1	Assess the county for areas with wind potential ranging from an “extensive” wind resource to lesser wind resources. This was completed by making use of the SEAI’s Wind Atlas for Ireland.
Step 2	Produce a landscape sensitivity analysis of the landscape to assess the sensitivity to wind energy developments. Sensitivity is assessed across factors of cultural heritage, scenic quality, rarity, uniqueness, natural heritage, and environmental factors.
Step 3	Combine the information collected from Step 1 and Step 2 into a layered map. Add layers to the map regarding the built and natural environment, archaeological and amenity designations in the Development Plan and existing settlements.
Step 4	Assess the suitability of the area for connecting to the national grid.

Following this procedure, a map is produced as illustrated in Plate 4-6. According to this map, the Proposed Development is located in 'Zone 1 - Acceptable in Principle' for wind energy development.

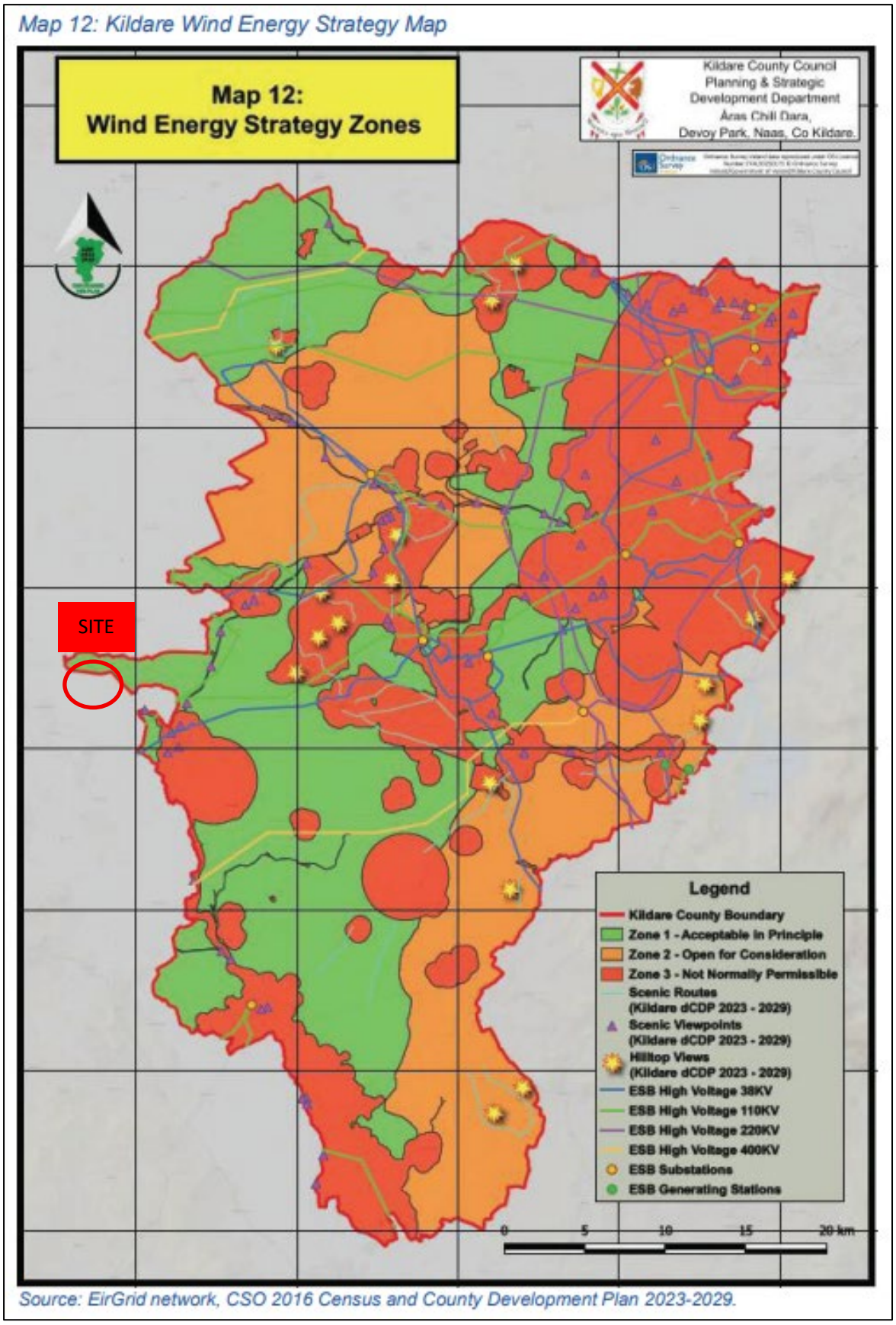


Plate 4-6: Map 12 of Appendix 2, Wind Energy Strategy, Kildare County Development Plan 2023 - 2029 (annotated by Fehily Timoney and Company, 2025.)[MF1] [RN2]

Section 6.10 of the Kildare Wind Energy Strategy includes a number of noise considerations for planning applications, which are specified below:

a) An acoustic report carried out by an appropriately qualified and competent person shall be prepared for all noise sensitive properties within a distance of ten times the rotor diameter of any proposed wind turbine location.

b) A separate acoustic report shall be prepared where there are other existing or permitted wind farm developments within 2km of the proposed development.

c) Relative related noise levels (LA rated, 10min) resulting from wind development and taking into account the cumulative impact of noise levels from existing and proposed wind energy developments shall not exceed:

Background noise levels by more than 5 dB(A) within the range 35-43 dB(A), or

43 dB(A), Both measured as LA90, 10min outdoors at specified noise sensitive locations

d) In lower noise environments where the background noise is less than 30 dB(A), the daytime level of the LA90, 10min of the wind energy noise shall be limited within the range of 35-40 dB(A).

e) Noise shall be measured in accordance with the most up-to-date ISO standards for noise measurement or other best practice standards, as appropriate.

The Strategy also specifies acoustic criteria for the commissioning of permitted wind farms:

f) Once commissioned, the development will be required to be monitored at the expense of the developer/operator. A noise monitoring report shall be submitted to the Planning Authority one year prior to commission and/or at the request of the Planning Authority. In the event that the monitoring report shows that any turbines is exceeding its projected noise levels and is having a detrimental noise impact, the wind turbines shall be turned off until compliance with noise limits is proven to the satisfaction of the Planning Authority. The Planning Authority reserves the right to commission an independent noise monitoring report to ensure compliance with noise limits are achieved, the costs of which shall be borne by the developer/operator.

The submitted acoustic report shall include the following:

1. A proposed noise monitoring and control procedure for the construction phase
2. A clear statement that the wind energy development shall not exceed the predicted LA rated levels per the acoustic report
3. A proposed detailed methodology for a post compliance noise survey in accordance with IOA GPG Supplementary Guidance Note 5: Post Completion Measurements for each turbine to be commenced within four weeks of commissioning of any turbine or group of turbines.
4. A map showing the noise monitoring locations for the ongoing phase of the wind energy development along with a detailed proposed noise monitoring and reporting procedure.
5. A proposal for a documented complaint handling procedure.

4.6.1.8 Kildare County Development Plan - Overview

In summary, the Proposed Development is appropriately sited for wind development, falling within 'Zone 1 - Acceptable in Principle', and is compliant with the relevant Development Plan standards. The Development Plan calculates that the county should have 280 MW of installed wind energy, but states that a more realistic 2030 target at this stage is 107 MW. There is currently 53.5 MW of permitted wind energy development within the county. It is clear that the County has a long way to go to make up the target of 107 MW, or even ambitiously achieve 280 MW by 2030. The Proposed Development is critical in attempting to meet such targets.

The Noise considerations suggested within the Kildare WES are based on the requirements outlined in the Draft Revised Wind Energy Development Guidelines, published by the Department of Housing, Planning and Local Government in 2019. Given the technical errors, ambiguities and inconsistencies contained in the 2019 Draft WEDGs discussed in Section 8.4.3.2.1, compliance with points a, b and c within section 6.10 of the Kildare Wind Energy Strategy is not possible. Having regard to the Kildare Wind Energy Strategy, the proposed development materially contravenes the Kildare Wind Energy Strategy and CDP 2023-2029 in respect of Noise compliance, however it is important to note the proposal will comply with the Kildare Wind Energy Strategy in all other respects. The material contravention is discussed in more detail at Section 6 of the submitted Planning Statement.

4.6.2 Offaly County Development Plan 2021 - 2027

The Offaly County Development Plan (Offaly CDP) 2023-2029, adopted on 10th September 2021, sets out the strategic framework for land use planning across Offaly. The most pertinent policies and objective are discussed in turn below.

4.6.2.1 Chapter 3: Climate Action Energy Statement

Table 4-13: Offaly County Development Plan Relevant Chapter 3 Policies and Objectives

Policy / Objective	Description
CAEP-01 CAEP-03	CAEP-01: It is Council policy to support and facilitate the development, reinforcement, renewal and expansion of the electricity transmission and distribution grid, including the development of new lines, pylons and substations as required to provide for the future physical and economic development of Offaly. CAEP-03: It is Council policy that proposals for new electricity distribution lines 38 kV or above along with transmission lines 110 kV or above will be considered subject to the protection of Designated and Non-Designated Sites as outlined in Objectives BLO-02 to BLO-06 and landscape considerations as outlined in objectives BLO-22 Areas of High Amenity, BLO-24 Landscape and BLO 26 and BLO-27 Protection of Key Scenic Views, Prospects and Key Amenity Routes. **Project Response** A new grid connection and associated infrastructure is proposed as part of this development, which facilitates the Development Plan's ambitions to develop, expand, and reinforce the electricity transmission and distribution grid. The Proposed Development contributes to climate change mitigation and a transition to a low carbon, climate-resilient and environmentally sustainable economy by providing a clean and stable energy source for the local community, enhancing the region's energy infrastructure sustainability.

Policy / Objective	Description
	It also enhances energy security and resilience in County Offaly, through diversifying the local energy mix and increasing the proportion of locally-generated renewable energy ultimately reducing the reliance on imported fossil fuels and offering improvements in the stability of the local energy supply.
CAEP-07 CAEP-10 CAEP-11 CAEP-37 CAEO-04	CAEP-07: It is Council policy to support and facilitate European and national objectives for climate adaptation and mitigation as detailed in the following documents, taking into account other provisions of the Plan (including those relating to land use planning, energy, sustainable mobility, flood risk management and drainage); • Climate Action Plan (2019 and any subsequent versions); • National Mitigation Plan 2017 (or subsequent editions); • National Climate Change Adaptation Framework (2018 and any subsequent versions); • Relevant provisions of any Sectoral Adaptation Plans prepared to comply with the requirements of the Climate Action and Low Carbon Development Act 2015, including those seeking to contribute towards the National Transition Objective, to pursue, and achieve, the transition to a low carbon, climate resilient and environmentally sustainable economy by the end of the year 2050; and • Offaly Climate Change Adaptation Strategy CAEP-10: It is Council policy to support local, regional, national and international initiatives for climate adaptation and mitigation and to limit emissions of greenhouse gases through energy efficiency and the development of renewable energy sources which make use of all natural resources, including publicly owned lands, in an environmentally acceptable manner. CAEP-11: It is Council policy to support the transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050, by way of reducing greenhouse gases, increasing renewable energy, and improving energy efficiency. CAEP-25: It is Council policy to encourage and facilitate the production of energy from renewable sources, such as from bioenergy, waste material, solar, hydro, geothermal and wind energy, subject to proper planning and environmental considerations. CAEP-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. 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.

Policy / Objective	Description
	Project Response The Proposed Development supports the above policy objectives by generating renewable energy, reducing reliance on fossil fuels, and lowering gas emissions. The Proposed Development further contributes to climate change mitigation and a transition to a low carbon, climate-resilient and environmentally sustainable economy by providing a clean and stable energy source for the local community, enhancing the region's energy infrastructure sustainability. It also enhances energy security and resilience in County Offaly, through diversifying the local energy mix and increasing the proportion of locally-generated renewable energy ultimately reducing the reliance on imported fossil fuels and offering improvements in the stability of the local energy supply.
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. **Project Response** As part of the site selection process, access to existing infrastructure within the surrounding area was a high criteria consideration. It was important for the applicant that the chosen site was highly accessible to existing Eirgrid connections. The proposed development includes an on-site 110kV substation which is then connected into the existing Bracklone Substation by 11.4km of underground electrical cabling. The grid connection route was chosen following consultation with EirGrid and a survey of potential route and connection options. Further information on the alternatives considered can be found in Chapter 3 – Site Selection and Alternatives. The grid connection route was selected because it minimises disruption to existing utility services in Portarlington. The Grid point of connection at Bracklone 110KV substation was identified based on the anticipated available capacity. EirGrid will carry out a high-level technical assessment to confirm the suitability of this connection point before issuing a formal connection offer. The assessment of reasonable alternative has been conducted as part of the Environmental Impact Assessment Report which accompanies this Planning Application. Please refer to Chapter 3 - Site Selection and Alternative for further information.

Policy / Objective	Description
CAEP-26	It is Council policy to encourage developers of proposed large scale renewable energy projects to carry out community consultation in accordance with best practice and to commence the consultation at the commencement of project planning. **Project Response** The project team has conducted extensive community engagement with the local community. Measures used to facilitate interaction include: establishing a dedicated email and phone line to contact the project team with question and queries; setting up a dedicated website for the application where frequent updates were uploaded; conducting door-to-door engagement; hosting of a townhall workshop on the 7th of May in which anybody could attend; and circulation of project information via post and hand. Please refer to Chapter 5: EIA Scoping and Consultation for further information and detail pertaining to community engagement.
CAEP-27:	It is Council policy to ensure that whenever possible, community benefits are derived from all renewable energy development in the county such as near-neighbour benefit funds and general community benefit funds, which may take the form of contributions in kind to local projects, assets and facilities such as public amenities on the renewable energy site, measures to promote energy efficiency or a local energy discount scheme. **Project Response** The Applicant is committed to giving back to the local community. The Proposed Development will set up a community benefit fund. The set up and management of the fund will be as per the RESS Rulebook for Community Benefit Funds under RESS as published by the Department of the Environment, Climate and Communications. The fund will allocate funds from the wind farm to community groups in the area should the wind farm be granted planning and be successful under the Government's Renewable Energy Support Scheme (RESS) support programme.
CAEP-28 CAEP-37 CAEP-38	CAEP-28: It is Council policy to co-operate if required with the Eastern and Midland Regional Assembly in identifying Strategic Energy Zones as areas suitable for larger energy generating projects, community and micro energy production, whilst ensuring environmental constraints and a regional landscape strategy are considered. CAEP-37: It is Council policy to recognise the importance of wind energy as a renewable energy source which can play a vital role in achieving national targets in relation to reductions in fossil fuel dependency and therefore greenhouse gas emissions. CAEP-38: It is Council policy that in assessing planning applications for wind farms, the Council shall: (a) 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;

Policy / Objective	Description
	(b) have regard to 'Areas Open for Consideration for Wind Energy Developments' in the Wind Energy Strategy Designations Map from the County Wind Energy Strategy; (c) the impact of the proposed wind farm development on proposed Wilderness Corridors as detailed in Objective BLO-28 of Chapter 4; (d) have regard to Development Management Standard 109 on wind farms contained in Chapter 13 of this Plan; and (e) have regard to existing and future international, European, national and regional policy, directives and legislation. **Project Response** During the preparation of this Application, the applicant has had regard to the above-mentioned criteria, along with other legislation and best practice guidelines. It is important to note that the subject lands falls within an 'Area Open for Consideration' as identified within the Offaly Wind Energy Strategy.
CAEP-54	It is Council policy to protect Flood Zone A and Flood Zone B from inappropriate development and direct developments/land uses into the appropriate Flood Zone in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 (or any superseding document) and the guidance contained in Development Management Standard DMS-106. Where a development/land use is proposed that is inappropriate within the Flood Zone, then the development proposal will need to be accompanied by a Development Management Justification Test and site specific Flood Risk Assessment in accordance with the criteria set out under with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 and Circular PL2/2014 (as updated/superseded). In Flood Zone C, (See DMS-106 where the probability of flooding is low (less than 0.1%, Flood Zone C), site-specific Flood Risk Assessment may be required and the developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed. The County Plan SFRA datasets (including Benefitting Lands mapping), emerging CFRAMS mapping (including National Indicative Fluvial mapping), and the most up to date CFRAM Programme climate scenario mapping should be consulted by prospective planning applicants and the planning authority in determining planning applications. **Project Response** A Site-Specific Flood Risk Assessment has been prepared by Fehily Timoney and forms part of the evidence material for this planning application, see Appendix 12.1 Chapter 12 - Flooding, Hydrology, and Water Quality. The study indicates that the proposed development, including a section of the TDR, is susceptible to fluvial flooding during 1-in-100-year (Flood Zone A) flood events, as identified in Stage 1 – Flood Risk Identification and further analysed in Stage 2 – Initial Flood Risk Assessment.

Policy / Objective	Description
	The proposed wind farm has been designed so that critical or essential infrastructure, such as the substation and the joint bays along the grid connection route, are located outside of flood zones. However, other elements of the development, such as some turbines and access tracks, are situated within flood-prone areas. In these cases, turbine plinths have been elevated above the 1-in-100-year flood level, accounting for the effects of climate change and incorporating a freeboard (clearance) of 500 mm. This design ensures that floodwaters will not impact the electrical or mechanical components of the turbines.
CAEP-55 CAEP-58 CAEP-59	CAEP-55: It is Council policy to require a Site-specific Flood Risk Assessment (FRA) for all planning applications in areas at risk of flooding (fluvial, pluvial or groundwater), even for developments deemed appropriate in principle to the particular Flood Zone. The detail of these site-specific FRAs will depend on the level of risk and scale of development. A detailed site-specific FRA should quantify the risks, the effects of selected mitigation and the management of any residual risks. The assessments shall consider and provide information on the implications of climate change with regard to flood risk in relevant locations. The 2009 OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management (or any superseding document) and available information from the CFRAM Studies shall be consulted with to this effect. CAEP-58: It is Council policy to have regard to the findings and recommendations of the current Strategic Flood Risk Assessment prepared as part of the County Development Plan. CAEP-59: It is Council policy to consult with the Office of Public Works (OPW) in relation to proposed developments in the vicinity of drainage channels and rivers for which the OPW are responsible, and the Council will retain a strip of 10 metres on either side of such channel where required, to facilitate access thereto. **Project Response** A Site-Specific Flood Risk Assessment has been prepared by Fehily Timoney and forms part of the evidence material for this planning application, see Appendix 12.1 Chapter 12 - Flooding, Hydrology, and Water Quality. The study indicates that the proposed development, including a section of the TDR, is susceptible to fluvial flooding during 1-in-100-year (Flood Zone A) flood events, as identified in Stage 1 – Flood Risk Identification and further analysed in Stage 2 – Initial Flood Risk Assessment. It was also established that the site is affected by pluvial flooding, as evidenced by historical records. The areas particularly affected include turbines T1, T4, T5, T8, and T9, along with their associated access tracks, as well as other areas where localised impacts on access roads were identified. A proposed bridge crossing the River Cushina is necessary to access the turbines located on the southern side of the site and to facilitate the grid connection route. The proposed wind farm has been designed so that critical or essential infrastructure, such as the substation and the joint bays along the grid connection route, are located outside of flood zones. However, other elements of the development, such as some turbines and access tracks, are situated within flood-prone areas. In these cases, turbine plinths have been elevated above the 1-in-100-year flood level, accounting for the effects of climate change and incorporating a freeboard (clearance) of 500 mm. This design ensures that floodwaters will not impact the electrical or mechanical components of the turbines.

Policy / Objective	Description
	Access tracks have not been raised above flood levels in order to avoid obstructing the floodplain and to preserve its storage capacity. Since these tracks will primarily be used for maintenance rather than emergency access, and during known weather conditions, this approach has been deemed acceptable. The FRA concluded that the proposed wind farm will slightly increase the water levels locally and within acceptable levels (<150 mm afflux as per OPW requirements) and the proposed TDR watercourse crossing will have a negligible impact on flood levels. Accordingly, the proposed development is considered to comply with the core principles of the Planning System and Flood Risk Management Guidelines.
CAEO-05	It is an objective of the Council to implement the Council's Wind Energy Strategy as follows: 1. In 'Areas Deemed Open for Consideration for Wind Energy Development' as identified in Map No. 10 'Wind Energy Strategy Designations', the development of windfarms and smaller wind energy projects will be considered; 2. In all other areas, wind energy developments shall not normally be permitted – except as provided for under relevant exemption provisions in the Planning and Development Regulations 2001 (as amended); and 3. Applications for re-powering (by replacing existing wind turbines) and extension of existing and permitted wind farms will be assessed on a case by case basis and will be subject to criteria listed in Development Management Standard 109 contained in Chapter 13 of Volume 1 of this County Development Plan and the Section 28 Ministerial Wind Energy Development Guidelines. **Project Response** The subject lands fall within an 'Area Open for Consideration' within the Offaly Wind Energy Strategy, and therefore the proposal for a Wind Farm in this location is in line with Council policy.

4.6.2.2 Chapter 4: Biodiversity and Landscape

The environment, biodiversity and the natural landscape are increasing in importance as the world continues to develop. As such, Offaly County Council has put together a series of policies and objectives aimed at protecting, enhancing and guiding development in an environmentally sensitive manner. The most relevant of which are outlined below.

Table 4-14: Offaly County Development Plan Relevant Chapter 4 Policies and Objectives

Policy / Objective	Description
CAEP-62	It is Council policy that where resources are available and subject to compliance with the Habitats and Birds Directives, the Council will contribute towards the improvement and / or restoration of the natural flood risk management functions of flood plains. Project Response: The Proposed Development supports the restoration and enhancement of natural flood risk management functions. Appendix 2.2, The Biodiversity Enhancement Management Plan (BEMP) includes riparian zone restoration along the Cushina River.
BLP-01	It is Council policy to protect, conserve, and seek to enhance the county's biodiversity and ecological connectivity. **Project Response** The project contributes to the protection and enhancement of biodiversity and ecological connectivity through the implementation of the BEMP. Measures include native hedgerow and treeline planting, riparian habitat restoration, and the creation of in-ditch wetlands, all of which support ecological networks across the site.
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. **Project Response** The EIAR demonstrates compliance with the EU Habitats Directive (92/43/EEC), the Birds Directive (2009/147/EC), the Wildlife Acts, and the Flora Protection Orders. Protected species such as otter, badger, and bats were identified during surveys, and mitigation measures—including buffer zones, pre-construction surveys, and monitoring—are proposed to ensure their protection.
BLP-24	It is Council policy to support the protection and management of existing networks of woodlands, trees and hedgerows which are of amenity or biodiversity value and/or contribute to landscape character, and to strengthen local networks. **Project Response** Existing woodlands, hedgerows, and treelines have been mapped and evaluated. The project avoids significant loss of these habitats and proposes enhancement through native species planting and fencing to protect bog woodland areas. Approximately 950m of hedgerow and 550m of treeline will be planted to strengthen local ecological networks.

Policy / Objective	Description
BLP-25	It is Council policy to encourage the planting of native species in all new residential developments (individual and multiple units) and as part of landscaping for commercial and industrial developments. **Project Response** The landscaping strategy includes the planting of native, pollinator-friendly species in accordance with the All-Ireland Pollinator Plan. Hedgerows and treelines will be composed of native species such as hawthorn, holly, and alder, contributing to biodiversity and landscape integration.
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. **Project Response** The development has been sensitively designed to retain and enhance the landscape character of the area. Infrastructure placement avoids and ecological features, and the BEMP includes amenity provisions and habitat restoration that will contribute positively to the local landscape.
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[6]). **Project Response** A comprehensive Appropriate Assessment (Natura Impact Statement) has been prepared, concluding that, with mitigation, the project will not adversely affect the integrity of any European site, either alone or in combination with other plans or projects. Hydrological connectivity and cumulative impacts have been fully assessed.
BLO-12	It is an objective of the Council to maintain a riparian zone for larger and smaller river channels based on the Inland Fisheries Ireland updated guideline document, 'Planning for Watercourses in the Urban Environment, a Guide to the Protection of Watercourses through the use of Buffer Zones, Sustainable Drainage Systems, Instream Rehabilitation, Climate / Flood Risk and Recreational Planning'.

[6] Except as provided for in Article 6(4) of the Habitats Directive, viz. there must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the project to proceed, and c) Adequate compensatory measures in place

Policy / Objective	Description
	Project Response The project adheres to Inland Fisheries Ireland's guidelines for riparian zone protection. Clear-span bridges are proposed for river crossings, and riparian fencing will be installed to prevent livestock access, allowing natural vegetation to regenerate and stabilise riverbanks.
BLO-16	It is an objective of the Council to encourage the preservation and enhancement of native and semi-natural woodlands, groups of trees and individual trees, not listed in Table 4.13 and 4.14; (a) in particular, on the grounds of Country Houses, Gardens and Demesnes and on approaches to settlements in the county; and (b) as part of the development management process, require the planting of native, deciduous, pollinator friendly trees in all new developments where possible. **Project Response** The project supports the preservation of native woodlands and trees through avoidance of sensitive habitats and enhancement measures. Bog woodland areas will be fenced to prevent grazing, and native deciduous trees will be planted as part of the BEMP, contributing to pollinator support and landscape character.
BLO-18	It is an objective of the Council to encourage the retention, wherever possible, of hedgerows and other distinctive boundary treatment in the county. Where removal of a hedgerow, stone wall or other distinctive boundary treatment is unavoidable, provision of the same type of boundary will be required of similar length and set back within the site in advance of the commencement of construction works on the site (unless otherwise agreed by the Planning Authority). **Project Response** Hedgerows and boundary features have been mapped and evaluated. Where removal is unavoidable, for infrastructure and bat buffers along the TDR, the project commits to replanting equivalent hedgerows within the site, ensuring continuity of ecological corridors and landscape features.
BLO-19	It is an objective of the Council to require all new developments to identify, protect and enhance ecological features by making provision for local biodiversity (for example, through provision of swift boxes or towers, bat roost sites, green roofs, etc.) and provide ecological links to the wider Green Infrastructure network as an essential part of the design process. **Project Response** The design process has incorporated biodiversity features such as bat buffer zones, riparian restoration, and native planting. Appendix 2.2 Biodiversity Enhancement Management Plan (BEMP) outlines measures to enhance local biodiversity and connect habitats to the wider Green Infrastructure network, including monitoring and adaptive management.

Policy / Objective	Description
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. **Project Response** Landscape sensitivity has been considered in the siting of turbines and infrastructure. Please refer to Chapter 3 Alternatives and Chapter 16 Landscape and Visual Impact.

Project Response

The Proposed Development aligns with the Offaly County Development Plan 2021 - 2027 in relation to making provision for local biodiversity, through the inclusion of a number of positive measures and an overall biodiversity net gain, as outlined under each objective above with further detail please refer to Chapter 9 and Appendix 2.2. Biodiversity Enhancement Management Plan (BEMP).

Furthermore, the Proposed Development also aligns with the Development Plans emphasis on protecting the environment and biodiversity, and the conservation of protected sites, habitats and species. As shown throughout the EIAR and accompanying reports, the Proposed Development will be designed and implemented in a way that minimises impact on the local ecosystem, the natural environment and the landscape. Furthermore, these reports contain extensive information which forms a sufficient basis for the competent authority to conduct its own assessment.

4.6.2.3 Section 4.14 - Landscape Sensitivity (a subsection within Chapter 4)

Section 4.14 contained within Chapter 4 of the Development Plan classifies the County into high, medium and low sensitivities areas. The site boundary of the subject site falls predominantly within an area of 'Low Landscape Sensitivity', with a small section of the site to the north falling within an area of moderate landscape sensitivity (as per Plate 4-7 below).

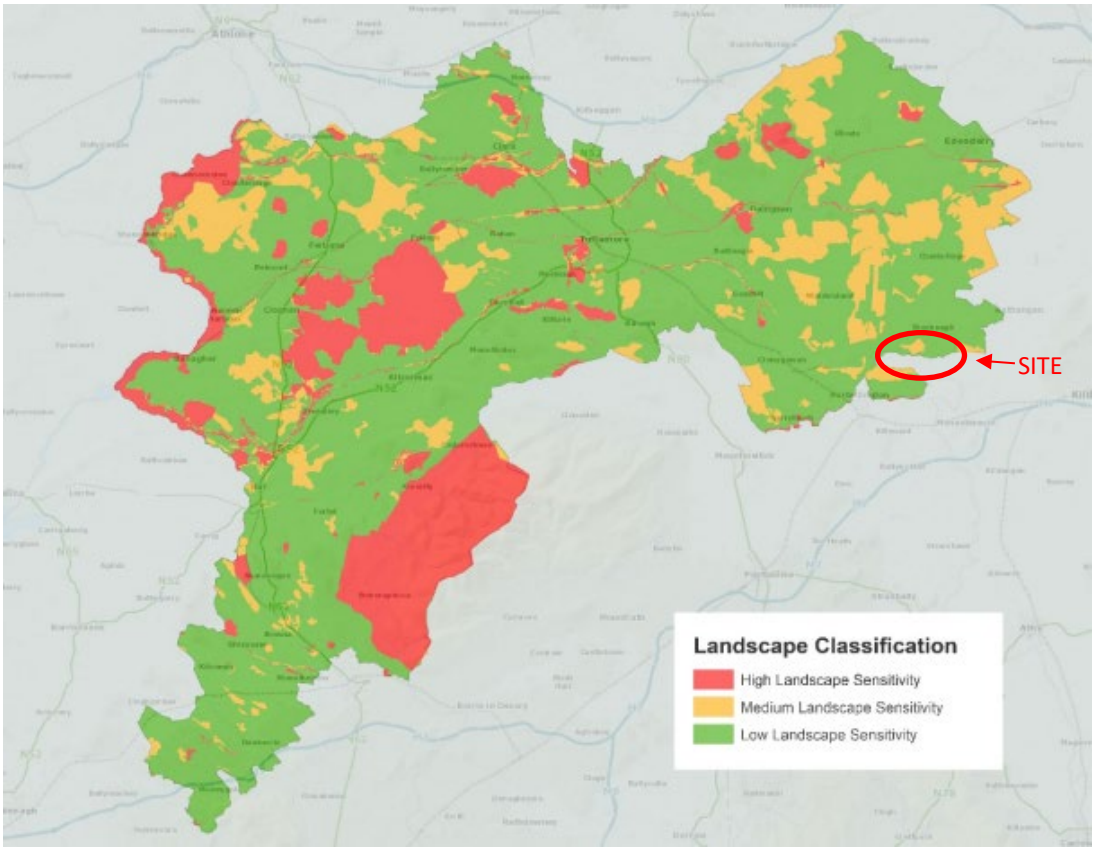


Plate 4-7: Landscape Classification Areas in County Offaly, in the Offaly County Development Plan 2021 - 2027 (annotated by Fehily Timoney and Company, 2025).

LOW SENSITIVITY AREAS

Low sensitivity areas are robust landscapes which are tolerant to change, such as the county's main urban and farming areas, which have the ability to accommodate development.

Characteristics:

County Offaly is largely a rural county which comprises of a predominantly flat and undulating agricultural landscape coupled with a peatland landscape. Field boundaries, particularly along roadside verges which are primarily composed of mature hedgerows typify the county's rural landscape.

Sensitivities:

- These areas in general can absorb quite effectively, appropriately designed and located development in all categories (including: telecommunication masts and wind energy installations, afforestation and agricultural structures).
- Within the rural areas, development shall be screened by appropriate natural boundaries that are sympathetic to the landscape generally, where possible.
- New housing proposed in rural areas should respect Offaly County Councils Rural Housing Design Guidelines, together with conformity with development standards.

Acceptability of Development for consideration: A wide range of development subject to appropriateness / conditions

Need for Landscaping and Appropriate Design: High.

MODERATE SENSITIVITY AREAS

Moderate sensitivity areas can accommodate development pressure but with limitations in the scale and magnitude. In this category of sensitivity, elements of the landscape can accept some changes while others are more vulnerable to change.

Characteristics:

Cutaway bogs cover a large part of the landscape of Offaly and in their entirety, are approximately 42,000 hectares. Generally, there are a number of land uses suitable for cutaway bog, not included in High Sensitivity Areas, which include wilderness, grassland, forestry and recreation. Some cutaway bog landscapes are more robust and may be considered for other uses.

Sensitivities:

- The development of Lough Boora (albeit designated as high sensitivity) acts as a prototype in the creation of parkland character.
- However, some of these cutaway bogs may be appropriate for other sensitively designed and located developments including renewable energy (wind farms, biomass crops) and/or industrial use.

The Council recognises the need for a land use framework plan for the future development and utilisation of large areas of cutaway bog within Offaly.

Acceptability of Development for consideration: Some form of development subject to appropriateness / conditions.

Need for Landscaping and Appropriate Design: Very High.

Plate 4-8: Low Sensitivity Areas in County Offaly in the Offaly County Development Plan 2021 - 2027.

Project Response

The development proposes a total of 5 No. turbines in Offaly County Council's administrative area, with 4 no. of these turbines (T3, T5, T8 & T9) falling within an area of 'low landscape sensitivity' and 1 no. turbine within an area of 'moderate sensitivity'. The low landscape sensitivity areas, in accordance with the relevant policy outlined beneath, are identified as "robust landscapes which are tolerant to change, such as the county's main urban and farming areas, which have the ability to accommodate development". There are no scenic views or routes identified within at least 15km of the site.

It is further detailed that, in terms of acceptability of development for consideration, these areas are able to accommodate a wide range of development subject to appropriateness / conditions and that these areas can absorb quite effectively, appropriately designed and located development in all categories, including wind energy installations.

The Proposed Development aligns with these policies through its high quality, sensitive and sympathetic design, centred around avoiding significant visual impacts and preserving the visual amenity of the surrounding area. Furthermore, documentation demonstrating same has been submitted as part of this Application.

Only 1 no. turbine (T3) falls within the area of 'medium landscape sensitivity', and it is important to note that through the site design process this turbine has been microsited to the boundary edge between the medium sensitivity and low sensitivity zones. It will therefore be screened by the adjacent conifer forestry. In accordance with the relevant policy, these are identified as areas that can accommodate development pressure but with limitation in the scale and magnitude. In this category of sensitivity, elements of the landscape can accept some changes while others are more vulnerable to change. On balance, whilst the landscape associated with the Grand Canal and River Barrow corridors are considered to have a comparatively higher landscape sensitivity (High-Medium), the landscape sensitivity of the Central Study Area is deemed to have a predominant Medium-Low sensitivity.

In conclusion, with regard to the location of the Proposed Development site at Derrynadarragh, all aspects related to the landscape and the suitability of the Proposed Development at the identified location are addressed in Chapter 16 - Landscape and Visual Impact Assessment. Following the policy analysis contained within this chapter, and assessments appended to this EIAR, the Proposed Development does not impact on any protected views or prospects and adheres to the overall proper planning and sustainable development of the area.

4.6.2.4 Chapter 13: Development Management Standards

Chapter 13 of the Development Plan outlines multiple sets of Development Management Standards, including in relation to Peatland Development and Wind Energy. These items are addressed in turn below.

Section 13.9.12 - Peatland Development

"DMS-108 Peatlands: In the consideration of development on or adjacent to 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;*
- *Consideration of habitats and species of environmental significance;*
- *Consideration of the potential contribution of peatlands to an existing or proposed greenway / blueway / peatway network;*
- *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 and hydrology;*
- *Consideration of existing and future rehabilitation measures including enhanced rehabilitation measures (i.e. drain blocking and rewetting);*
- *Consideration of peatland stability;*
- *Achieving of a carbon emissions balance; and*
- *Incorporation of fire mitigation measures such as fire breaks or ensuring access points and routes are suitable for travel by emergency services."*

Project Response

The subject site for the Proposed Development includes and falls adjacent to areas of peatland. It is of importance to note that the site primarily comprises agricultural farmland with some minor areas of peat bog also included within the redline boundary.

The Proposed Development has taken into account the above-mentioned guiding principles in the formulation of the design of this Application. Through a number of chapters, the proposal addresses the policy bullet points set out above:

- Soil and Peat stability - assessed through Chapter 11 - Soils, Geology and Hydrogeology
- Consideration of habitats - refer to Chapter 9 - Biodiversity, Chapter 10 - Ornithology, and the NIS
- Mitigation Measures - set out within the BEMP, and included within Chapter 12 - Flooding, Hydrology and Water Quality
- Fire mitigation - refer to CEMP
- Carbon calculation - included within Chapter 7 - Air and Climate

As such, it is considered that the Proposed Development aligns with the considerations outlined in the Offaly County Development Plan.

Section 13.9.13 - Energy and Communications - DMS-109

The Proposed Development comprises a Wind Farm, including the associated grid connection and ancillary infrastructure. As such DMS-109 outlined in Section 13.9.13 of the Development Plan is relevant. It states the following:

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

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

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

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

This list is not exhaustive and the Council may consider other requirements contained in the chapter on a case by case basis with planning applications should the need arise. Where impacts are predicted to arise as a result of the development proposed, suitably detailed mitigation measures shall be proposed."

Project Response

The Proposed Development has taken account of the development management standard outlined above. With the proposed wind farm being designed so that critical or essential infrastructure, such as the substation and the joint bays along the grid connection route, are located outside of flood zones. However, other elements of the development, such as some turbines and access tracks, are situated within flood-prone areas. In these cases, turbine plinths have been elevated above the 1-in-100-year flood level, accounting for the effects of climate change and incorporating a freeboard (clearance) of 500 mm. This design ensures that floodwaters will not impact the electrical or mechanical components of the turbines.

The proposed turbines will form a prominent feature within the local landscape context, however the scale and lateral extent of the array are well accommodated within the broad landform and land cover context of the surrounding peatland landscape and even at relatively close range, the turbines are not perceived as overbearing. Receptor sensitivity across the local community viewpoints was deemed to be Medium–low for all receptors with views generally associated with a more robust working landscape character and lightly settled landscape, influenced by the presence of extensive peatland, agricultural farmland, and coniferous forestry plantations.

The final bullet point stating, "*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*" cannot be achieved through this proposal and in essence would be considered a material contravention. The 'Draft Revised Wind Energy Development Guidelines (WEDGs) (2019)' were published by the Department of Housing, Planning and Local Government in December 2019. This draft document is the most recent publication from the Department of Housing, Planning and Local Government. However, the guidelines have a number of technical errors, ambiguities and inconsistencies and require further detailed review and amendment. This is a fact supported by several acoustic consultants from Ireland and the UK and the review and amendment by the Department remains ongoing at the time of writing this EIAR. In assessing the draft Guidelines, the World Health Organization (WHO, 2018) 45 dB Lden noise criterion was considered. The WHO document is based on a very limited data set, which only estimated the Lden for the sites studied, rather than assessing it directly from wind statistics.

The guidelines also state… "it may be concluded that the acoustical description of wind turbine noise by means of Lden or Lnight may be a poor characterization of wind turbine noise and may limit the ability to observe associations between wind turbine noise and health outcomes."

Furthermore, the WHO recommendation is "conditional". A conditional recommendation, before it becomes folded into any legislative context, would require substantial debate of stakeholders (such as, but not limited to the Public, government bodies, wind farm developers and operators as well as turbine manufacturers). A conditional recommendation is based on low quality evidence that this chosen noise level is effective. Therefore, it would be premature to adopt the WHO recommendations without further careful and detailed consideration and therefore this has not been adopted. This is detailed further within Section 6 of the Planning Statement supporting this planning application.

4.6.2.5 Offaly Wind Energy Strategy

The Wind Energy Strategy forms part of the Offaly CDP, which sets out the mapping analysis undertaken by the Council to identify suitable locations for wind energy development areas within the County. This included assessment of wind speeds and accessibility to the grid, and evaluation of the landscape and sensitivity areas (scenic views and prospects). Plate 4-9 is an extract from the Offaly Wind Energy Strategy which demonstrates the areas of potential for wind energy development in blue. The Derrynadarragh Wind Farm site falls within 'Potential Area 2' which is deemed as an area '*Open for consideration for Wind Energy Development' in principle'*:

> ***"2. Area generally from Cloneygowan to Clonbullogue***
> *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."*

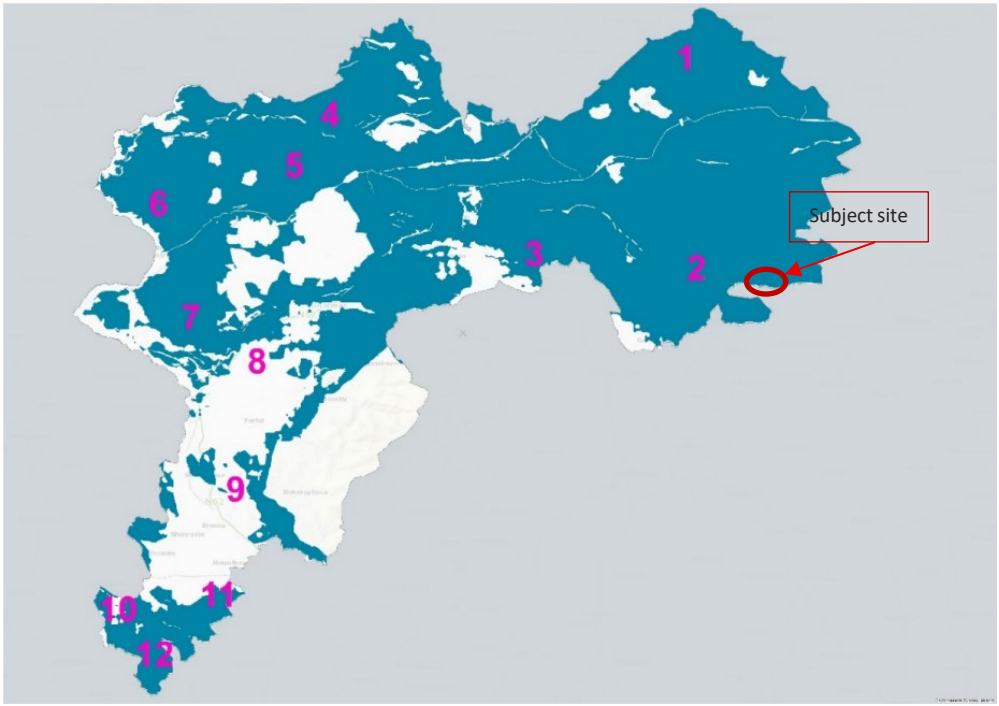


Plate 4-9: Extract from Offaly Wind Energy Strategy - Potential Wind Energy Areas

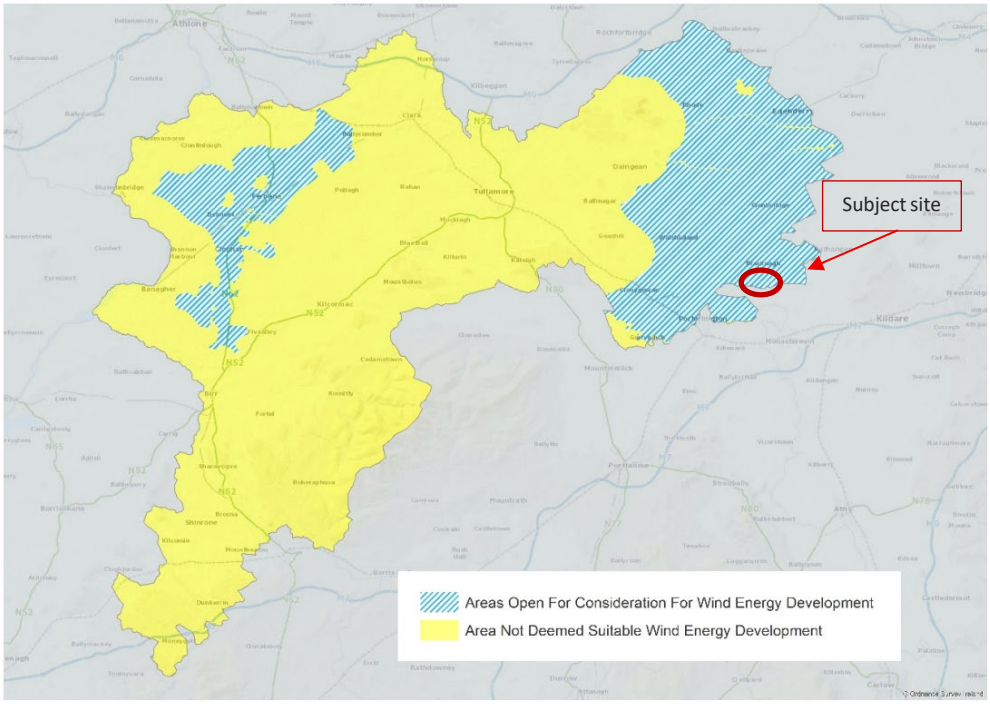


Plate 4-10: Extract from Offaly Wind Energy Strategy – Wind Energy Strategy Designations

Section 8 of the Wind Energy Strategy includes the 'Wind Energy Development Policy' which states that,

> *"It is the policy of the Council to assess proposals for new wind energy developments in accordance with Map No. 10 'Wind Energy Strategy Designations', Climate Action Energy Objective CAEO-05 (Chapter 3 Climate Action and Energy) and the following parameters:*

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 this County Development Plan and the Section 28 Wind Energy Development Guidelines……"

Section 9 of the Wind Energy Strategy looks at the consistency between Offaly County Council Wind Energy Strategy and the adjacent Local Authorities Wind Energy Strategies. Relevant to the Derrynadarragh Wind Farm proposal is Kildare County Council and Laois County Council, since preparation of the Offaly CDP, the Kildare CDP 2023-2029 now includes a Wind Energy Strategy, as detailed at Section 4.3.2 of this Planning Statement. The subject lands are still considered as an area 'open for consideration' for wind farm development.

4.6.2.6 Offaly County Development Plan - Overview

In summary, the Proposed Development is appropriately sited for wind development, falling within an 'Area Open for Consideration for Wind Energy Development' within the Offaly Wind Energy Strategy. The Proposed Development will contribute to climate change mitigation and a transition to a low carbon, climate-resilient and environmentally sustainable economy by providing a clean and stable energy source for the local community, enhancing the region's energy infrastructure sustainability.

In accordance with 'CAEP-55' the planning application comprises a Site Specific Flood Risk Assessment. The proposed wind farm has been designed so that critical or essential infrastructure, such as the substation and the joint bays along the grid connection route, are located outside of flood zones. However, other elements of the development, such as some turbines and access tracks, are situated within flood-prone areas. In these cases, turbine plinths have been elevated above the 1-in-100-year flood level, accounting for the effects of climate change and incorporating a freeboard (clearance) of 500 mm. The design ensures that floodwaters will not impact the electrical or mechanical components of the turbines.

The Proposed Development aligns with the Offaly CDP in relation to making provision for local biodiversity, through the inclusion of a number of positive measures and an overall biodiversity net gain, as outlined under each objective above with further detail please refer to Chapter 9 and Appendix 2.2. Biodiversity Enhancement Management Plan (BEMP).

Full regard has been had to the Offaly CDP Policies and objectives, and the Offaly WES and the obligations therein. Development Management Standard 'DMS-109: Wind Farms' contains a bullet point which seeks proposals to consider noise disturbance including '*consistency with the World Health Organisation's 2018 Environmental Noise Guidelines for the European Region), shadow flicker and air quality.* Given the technical errors, ambiguities and inconsistencies contained in the 2019 Draft WEDGs discussed in Section 8.4.3.2.1, full compliance with the development management standard for wind farms is not possible, and for this reason would be considered a material contravention. The material contravention is discussed in more detail at Section 6 of the submitted Planning Statement.

4.6.3 Laois County Development Plan 2021 - 2027

The Laois County Development Plan 2021-2027 came into effect on 8th March 2022. The proposed wind farm site itself falls within the administrative boundaries of Kildare and Offaly, however the proposed grid connection route runs from the site, through the administrative boundary of Laois County Council, to Bracklone Substation. Due regard has therefore been given to the relevant policies within the Laois County Development Plan 2021 - 2027.

Table 4-15: Laois County Development Plan Relevant Energy Policies and Objectives

Policy / Objective	Description
Objective CM RE 2	Promote and encourage the development of energy from renewable sources such as hydro, bio-energy, wind, solar, geothermal and landfill gas subject to compliance with normal planning and environmental criteria in co-operation with statutory and other energy providers.
Objective CM RE 5	Promote and facilitate wind energy development in accordance with the Guidelines for Planning Authorities on Wind Energy Development (Department of Housing, Planning and Local Government) and any update thereof and the Appendix 5 Wind Energy Strategy of this Plan, the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change, and subject to compliance with normal planning and environmental criteria.
Objective CM RE 6	Ensure a setback distance for Wind turbines from schools, dwellings, community centres and all public roads in all areas open for consideration for wind farm development as per the Guidelines for Planning Authorities on Wind Energy Development (Department of Housing, Planning and Local Government).
Objective CM RE 7	Promote the location of wind farms and wind energy infrastructure in the 'preferred areas' as outlined on Map 3.2 to prohibit such infrastructure in areas identified as 'Areas not open for consideration' and to consider, subject to appropriate assessment, the location of wind generating infrastructure in areas 'open for consideration' and as per the Laois Wind Energy Strategy 2021-2027.
NRE 4	Facilitate the provision of and improvements to energy networks in principle, provided that it can be demonstrated that: i. The development is required in order to facilitate the provision or retention of significant economic or social infrastructure; ii. The route proposed has been identified with due consideration for social, environmental and cultural impacts; iii. The design is such that will achieve least environmental impact consistent with not incurring excessive cost; iv. Where impacts are inevitable mitigation features have been included; v. Proposals for energy infrastructure should be assessed in accordance with the requirements of Article 6 of the Habitats Directive: vi. Ensure that the ability of the area to absorb overhead transmission lines is considered with reference to the National Landscape Strategy 2015:

Policy / Objective	Description
	vii. Cognisance will be taken of the Code of Practice between the DoECLG and Eirgrid (2009). Ensure that landscape and visual assessment of planning application shall focus on the potential to impact upon landscape designations and important designated sites.

Section 6.13 of the Wind Energy Strategy Plan contained at Appendix 5 of the Laois Development Plan, outlines details pertaining to Grid Connections. It states the following key points:

> *"While the grid provider is responsible for grid connections, details of likely routes shall be included with the planning application. Connections within the wind farm will be laid underground…*
>
> *Separate to the grid connection, the transport of electricity from the turbines to a substation, which connects to the grid, will usually require the establishment of ancillary infrastructure which may cause separate additional visual impact although undergrounding of services, albeit more costly, usually lessens this impact."*

The Laois CDP includes 'Map 3.2 – Wind Energy' (refer to Plate 4-11 below) which sets out the 'preferred areas' for wind energy development, those 'areas open for consideration', and 'areas not open to consideration'. The Derrynadarragh Wind Farm site itself falls outside of the Laois Administrative boundary, however sections of the grid connection route traverse Laois as it connects into Bracklone Substation.

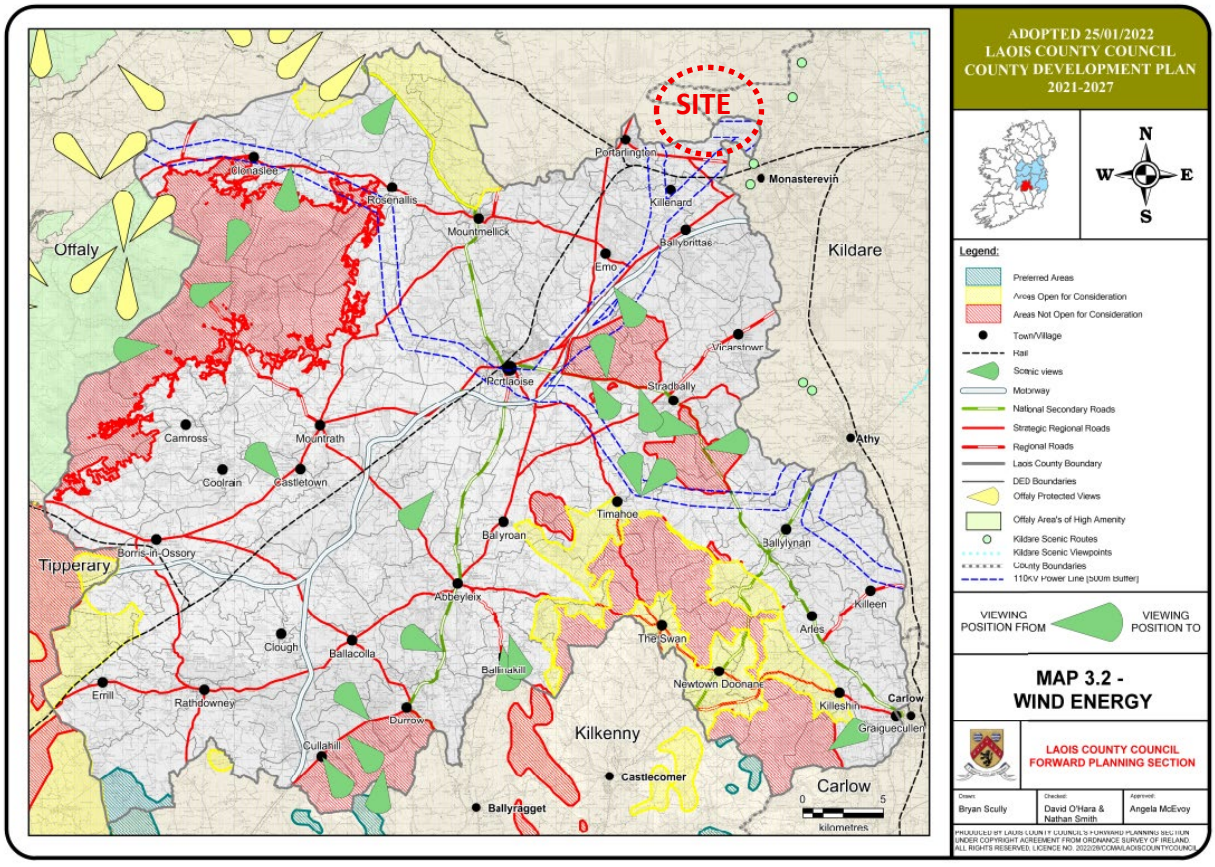


Plate 4-11: Extract of Map 3.2 – Wind Energy of the Laois CDP (Site location outlined in red dashed line)

Project Response

The Proposed Grid Connection will comprise 11.4km of underground 110kV electrical cabling which will pass through the townlands of Cushina in County Offaly; Derrylea, and Inchacooly in County Kildare, and Coolnaferagh, Ullard or Controversyland, Clonanny, Lea, Loughmansland Glebe, and Bracklone in County Laois. The Proposed Grid Connection has been identified to supply power from the proposed development to the Irish National Electricity Grid will exit the site to the south and follow the public road to Bracklone Substation (currently under construction). The cabling that forms part of this connection will be laid underground existing road ways and tracks, thereby minimising impact and aligning with the above-mentioned policies and objectives of the Laois Development Plan.

The grid connection route was chosen following consultation with EirGrid and a survey of potential route and connection options. Further information on the alternatives considered can be found in Chapter 3 – Site Selection and Alternatives. The grid connection route was selected because it minimises disruption to existing utility services in Portarlington. The Grid point of connection at Bracklone 110KV substation was identified based on the anticipated available capacity. EirGrid will carry out a high-level technical assessment to confirm the suitability of this connection point before issuing a formal connection offer.

Upon decommissioning of the Proposed Wind Farm, the 110kV substation within Cushina townland will remain part of the national grid infrastructure.

4.7 Conclusion

The policies, objectives and legislation as described throughout this chapter have set out all significant International, European, National, Regional and Local policy support for a move to renewable energy technologies and a reduction in greenhouse gas emissions. Ireland is committed to meeting International and European targets, and if these targets are not met, the government must purchase Carbon Credits to meet compliance with both emissions and renewable energy targets or face fines from the EU.

The SEAI report, Energy in Ireland (2023) set out the nation's latest progress towards renewable energy targets, 2022 saw renewable energy production accounts for approximately 13.1% of the nation's overall energy production. The National Renewable Energy Action Plan (NREAP) has set a target of 16% by the year 2020. It is evident that we still have not achieved this target, now that some time has passed.

While Ireland has come a long way in increasing renewable energy generation, the targets are ever increasing from a European perspective. The 2050 European targets effectively mean that Europe's energy production will have to be almost carbon-free by 2050.

Now that the Revised NPF has been adopted (as of 30th April 2025), the Regional Capacity Allocations will need to be met up to 2040, with this proposal contributing approx. 64.8MW which is circa 3.3% of the remaining 1,966MW of additional power to be allocated within the Eastern and Midlands Region over the next 15 years.

CAP24 sets out an objective to more than double Ireland’s onshore wind energy capacity to 9 GW by 2030, in order to meet new renewable energy targets and reduce emissions. This remains the target under CAP25. There is a clear national mandate to accommodate significant onshore wind within the next decade. Furthermore, the Revised National Planning Framework, places greater emphasis on a move to a low-carbon economy to reduce Ireland's carbon footprint by integrating climate action into the planning system in support of national targets.

It is this commitment on energy and climate policy that justifies a clear need for renewable energy generation in Ireland. It is recognised that there are a range of renewable resources alternatives that could be explored to meet our International and European commitments, however onshore wind is recognised as being a key to achieving this as emphasised in the Climate Action Plan 2025 (CAP35). It is also a proven technology that will be critical to meeting the near-term renewable targets up to 2030.

The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Region supports the increased use of renewable energy sources to transition the Eastern and Midlands Region to a low carbon, climate resilient and environmentally sustainable economy to mitigate against climate change. The RSES aims to leverage the Eastern and Midlands Region as a leader and innovator in sustainable renewable energy generation, supporting the development of a renewable energy project in an appropriate location, such as that of Derrynadarragh Wind Farm.

National and Regional Energy Policies and Objectives have been reinforced through the Kildare County Development Plan 2023 - 2029, Offaly County Development Plan 2021-2027, and Laois County Development Plan 2021-2027, including the appended Wind Energy Strategy's for each administrative boundary. There is a plan-led approach to wind energy development within each of the Council Districts, demonstrating the policy context for the Derrynadarragh site and surrounding lands.

The principle of development for wind energy should be considered as acceptable by An Comisiún Pleanála (the "Commission"), with the wind farm site falling in the following zoning areas within their respective Council boundaries:

- Kildare County Council - Site falls within the 'Zone 1 - Acceptable in Principle'; and
- Offaly County Council - Site falls within an area identified as 'Open to Consideration for Wind Energy Development'.

In consideration of the reasons and analysis as set out in this chapter of the EIAR, it is our professional opinion that the Project adheres to all relevant planning policies, and therefore, is favourable from a national and local policy perspective, particularly in relation to the National Planning Framework (NPF), The Climate Action Plan 2024 & 2025 (CAP24 & CAP25), and The Climate Action and Low Carbon Development (Amendment) Act 2021 (the "Climate Act"). The Project will contribute significantly to the ambitious targets set out in the policies as described within this chapter and enhance and expand upon the existing mix of renewables in Ireland's electricity network and national grid.

There is a clear need for renewable energy generation in Ireland, and onshore wind such as the Proposed Development is recognised as being a key to achieving this, and we consider the Project to be consistent with International, National and Regional energy policies, as well as the county policies as contained within the Kildare County Development Plan 2023 - 2029, Offaly County Development Plan 2021-2027, and Laois County Development Plan 2021-2027.

4.8 References

A Roadmap for Moving to a Competitive Low Carbon Economy in 2050. Available at: https://eravisions.archiv.zsi.at/stocktaking/7.html

Commission for Regulation of Utilities (2017), Review of Typical Consumption Figures – Decision Paper. Available at: https://www.cru.ie/document_group/review-of-typical-consumption-figures-decision-paper/

Code of Practice for Wind Energy Development in Ireland – Guidelines for Community Engagement. Available at: https://www.google.com/search?q=Code+of+Practice+for+Wind+Energy+Development+in+Ireland+%E2%80%93+Guidelines+for+Community+Engagement&rlz=1C1GCEA_enIE958IE958&oq=Code+of+Practice+for+Wind+Energy+Development+in+Ireland+%E2%80%93+Guidelines+for+Community+Engagement&aqs=chrome.0.69i59.1294j0j7&sourceid=chrome&ie=UTF-8

Comptroller and Auditor General (2018). Report on the Accounts of the Public Services 2018. Available at: https://www.audit.gov.ie/en/Find-

Report/Publications/Report%20on%20the%20Accounts%20of%20the%20Public%20Services/Report-on-theAccounts-of-the-Public-Services-2018.pdf

Council of the European Union (2008), Directive of the European Parliament and of the Council on the Promotion of the Use of Energy from Renewable Sources, 2008/0016 (COD), Brussels, December 2008. Available at:

http://www.ewea.org/fileadmin/ewea_documents/documents/00_POLICY_document/RESdirective_consolidated.pdf

Clean Energy for all Europeans Package (2019). Available at: https://fsr.eui.eu/the-clean-energy-for-all-europeans-package/

Climate Action and Low Carbon Development Act 2015. Available at: https://ec.europa.eu/clima/eu-action/european-green-deal/european-climate-law_en

Climate Action and Low Carbon Development (Amendment) Act 2021. Available at: https://ec.europa.eu/clima/eu-action/european-green-deal/european-climate-law_en

Climate Action Plan (2021). Available at: https://www.gov.ie/en/publication/6223e-climate-action-plan-2021/

Department of the Environment, Climate and Communication (2018), Renewable Electricity Support Scheme (RESS) - High Level Design. Available at: https://www.gov.ie/en/publication/36d8d2-renewable-electricitysupport-scheme/

Department of the Environment, Climate and Communication (2019), RESS-1 Auction Design and Implementation Project - Industry Briefing, September 13, 2019. Available at: https://www.gov.ie/en/publication/36d8d2-renewable-electricity-support-scheme/

Department of the Environment, Climate and Communication (2019) Climate Action Plan. Available at: https://www.gov.ie/en/publication/ccb2e0-the-climate-action-plan-2019/

Department of the Environment, Climate and Communication (2016), Code of Practice for Wind Energy Development in Ireland - Guidelines for Community Engagement. Available at: https://www.gov.ie

Department of the Environment, Climate and Communication (2021), Climate Action and Low Carbon Development (Amendment) Act 2021. Available at: http://www.irishstatutebook.ie/eli/2021/act/32/section/15/enacted/en/html

Department of Housing Planning and Local Government (2018), Project Ireland 2040 – National Planning Framework. Available at: http://npf.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf

Department of Housing, Planning and Local Government (2019), Draft Revised Wind Energy Development Guidelines (December 2019). Available at:https://www.housing.gov.ie/sites/default/files/publicconsultation/files/draft_revised_wind_energy_development_guidelines_december_2019.pdf

Department of Public Expenditure and Reform (2018), Project Ireland 2040 – National Development Plan 2018 -2027. Avalable at: https://www.gov.ie/pdf/?file=https://assets.gov.ie/831/130718120306-5569359NDP%20strategy%202018-2027_WEB.pdf#page=1

Department of the Environment, Heritage and Local Government (2006), Wind Energy Development Guidelines. Available at: https://www.gov.ie/en/publication/f449e-wind-energy-development-guidelines-2006/

Draft Revised Wind Energy Development Guidelines (December 2019). Available at: https://www.google.com/search?q=Draft+Revised+Wind+Energy+Development+Guidelines+(December+2019)&rlz=1C1GCEA_enIE958IE958&oq=Draft+Revised+Wind+Energy+Development+Guidelines+(December+2019)&aqs=chrome..69i57.1166j0j7&sourceid=chrome&ie=UTF-8

European Union Targets for 2020 and the Irish Context. Available at: https://data.oireachtas.ie/ie/oireachtas/libraryResearch/2020/2020-05-14_l-rs-note-the-european-green-deal-and-its-implications-for-ireland_en.pdf

EPA (2019), Ireland's Greenhouse Gas Emissions Projections 2018-2040. Available at: https://www.epa.ie/pubs/reports/air/airemissions/ghgprojections20182040/Greenhouse_Gas_Projections.pdf

European Climate Law (July 2021). Available at: https://ec.europa.eu/clima/eu-action/european-green-deal/european-climate-law_en

European Commission (2014), Policy framework for climate and energy in the period from 2020 to 2030. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52014DC0015&from=EN

European Commission (2017) Europe 2020 indicators – Climate Change and Energy. Available at: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Europe_2020_indicators__climate_change_and_energy&oldid=395312

European Commission (2019), Clean Energy for all Europeans Package. Available at: https://op.europa.eu/en/publication-detail/-/publication/b4e46873-7528-11e9-9f0501aa75ed71a1/language-en

European Commission (2019), Report from the Commission to the European Parliament, the Council, The European Economic and Social Committee and the Committee of the Regions - Renewable Energy Progress Report. Available at: https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A52017DC0057

European Commission (July 2016), Ireland's EU 2030 emissions targets published, available at: http://ec.europa.eu/ireland/news/ireland-s-eu-2030-emissions-targets-published_en

European Commission (2019), A European Green Deal. Available at: https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal_en

European Commission (2020), Renewable Energy Statistics. Available at: https://ec.europa.eu/eurostat/statistics-explained/index.php/Renewable_energy_statistics#:~:text=In%202018%2C%20renewable%20energy%20represented,EU%20reached%208.3%20%25%20in%202018

European Union (2019), Auctioning Regulation amendment for phase 4 of the EU ETS published and to enter into force. Available at: https://ec.europa.eu/clima/news/auctioning-regulation-amendment-phase-4-eu-etspublished-and-enter-force_sl

European Union (2009), EU Directive on Promotion of the Use of Energy from Renewable Sources. Available at: http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:140:0016:0062:EN:PDF

EU Governance Regulation and Ireland's National Energy and Climate Plan (NECP). Available at: https://www.google.com/search?q=EU+Governance+Regulation+and+Ireland%E2%80%99s+National+Energy+and+Climate+Plan+(NECP)&rlz=1C1GCEA_enIE958IE958&oq=EU+Governance+Regulation+and+Ireland%E2%80%99s+National+Energy+and+Climate+Plan+(NECP)&aqs=chrome..69i57.5933j0j7&sourceid=chrome&ie=UTF-8

Government of Ireland (2015), Climate Action and Low Carbon Development Act. Available at: http://www.irishstatutebook.ie/eli/2015/act/46/enacted/en/html

Government of Ireland (2021). Available at: https://www.gove.ie

Ireland's Greenhouse Gas Emission Projections, 2018 – 2040. Available at: https://scholar.google.com/scholar?q=Ireland%E2%80%99s+Greenhouse+Gas+Emission+Projections,+2018+-+2040&hl=en&as_sdt=0&as_vis=1&oi=scholart

Irish Wind Energy Association – Best Practice Guidelines for the Irish Wind Energy Industry. Available at: https://windenergyireland.com/images/files/9660bdfb5a4f1d276f41ae9ab54e991bb600b7.pdf

IWEA (2012), Best Practice Guidelines for the Irish Wind Energy Industry. Available at: https://www.iwea.com/images/files/9660bdfb5a4f1d276f41ae9ab54e991bb600b7.pdf

Kildare County Development Plan. Available at: https://kildarecoco.ie/AllServices/Planning/DevelopmentPlans/KildareCountyDevelopmentPlan2023-2029/

Laois County Development Plan. Available at: https://consult.laois.ie/en/consultation/laois-county-development-plan-2021-2027

Offaly County Development Plan. Available at: https://www.offaly.ie/c/county-development-plan/

Project Ireland 2040: The National Planning Framework. Available at: https://npf.ie/project-ireland-2040-national-planning-framework/

Project Ireland 2040: National Development Plan 2021 – 2030. Available at: https://www.gov.ie/en/publication/774e2-national-development-plan-2021-2030/

Recast Renewable Energy Directive (RED2). Available at: https://energy.ec.europa.eu/topics/renewable-energy/renewable-energy-directive-targets-and-rules/renewable-energy-directive_en

Renewable Electricity Support Scheme (RESS). Available at: https://www.gov.ie/en/publication/36d8d2-renewable-electricity-support-scheme/

RESS 4: Final Auction Results Renewable Electricity Support Scheme R4FAR 27th September 2024. Available at: https://cms.eirgrid.ie/sites/default/files/publications/RESS-4-Final-Auction-Results-R4FAR.pdf

Renewable Electricity Support Scheme (RESS). Available at: https://www.gov.ie/en/publication/36d8d2-renewable-electricity-support-scheme/

SEAI (September 2024), First Look: Renewable Energy in Ireland 2023: Visualising renewable energy data from SEAI's national energy balance. Available at: https://www.seai.ie/data-and-insights/seai-statistics/key-publications/renewable-energy-in-ireland/First-Look-Renewable-Energy-in-Ireland-Report.pdf

National Energy and Climate Plan (NECP) 2021-2030, (National Energy and Climate Plan (NECP) 2021-2030) Available at: https://www.gov.ie/en/publication/a856a-national-energy-and-climate-plan-necp-2021-2030/

Southern Regional Assembly (2020), Regional Spatial and Economic Strategy (RSES) for The Southern Region. Available at: https://www.southernassembly.ie/uploads/general-files/Regional_Spatial__Economic_Strategy_for_the_Southern_Region_LOW_RES.pdf

United Nations (2013), United Nations Framework Convention on Climate Change: five steps to a safer future. Available at: http://unfccc.int/essential_background/convention/items/6036.php

Wind Energy Ireland (WEI) and KPMG (2021) 'Economic impact of onshore wind in Ireland'. Available online at: https://windenergyireland.com/images/files/economic-impact-of-onshore-wind-in-ireland.pdf

EU Governance Regulation. Available at: https://eur-lex.europa.eu/legal content/EN/TXT/PDF/?uri=CELEX:32018R1999&from=EN

National Energy and Climate Plans. Available at: https://www.gov.ie/en/publication/0015c-irelands-national-energyclimate-plan-2021-2030/

2030 Climate and Energy Framework. Available at: https://ec.europa.eu/clima/eu-action/climate-strategies-targets/2030-climate-energy-framework_en

Kyoto Protocol To The United Nations Framework Convention On Climate Change. Available at: https://unfccc.int/resource/docs/convkp/kpeng.pdf

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