Comhairle Chontae Uíbh Fhailí
Offaly County Council

Planning and Development Act 2000 (as amended)

CE Report to Elected Members on Strategic Infrastructure Development as required by Section 37E(4) of the Planning and Development Act 2000 (as amended)

Lemanaghan Wind Farm
An Coimisiún Pleanála Case reference: PAX19.324161

Application Details

Applicant:	Lemanaghan Wind Farm Designated Activity Company
Agent:	MKO
An Coimisiún Pleanála Case reference:	PAX19.324161
Proposed Development (Summary):	Proposed development of 15 no. wind turbines, a permanent 220 kV substation and all associated infrastructure – RED III application.
Site Location:	Townlands of Cooldorragh, Kilnagarnagh, Cappanalosset, Tumbeagh, Killaghintober, Castlearmstrong, Leabeg, Cornafurrish and Corrabeg, Lemanaghan, Kilnagoolny, Straduff, Lisdermot, Derrica More, Rosfaraghan, Rashinagh, Cor Mor and Cor Beg, Corbane, and Ballindown Co. Offaly
Associated Website:	www.lemanaghanwindfarmplanning.ie

Executive Summary

While the proposed Lemanaghan windfarm is largely located within the area deemed "Open for Consideration" for such development within the Offaly County Development Plan 2021-2027, the Commission is requested to have particular regard to the following:

CAEP (Policy)-18:

It is Council policy that in assessing planning applications for wind farms, the Council shall have regard to [amongst other considerations] *Development Management Standard 109 on wind farms contained in Chapter 13 of this Plan.*

DMS-109 in turn states that "*In addition to the above,* [Wind Energy Guidelines; Wind Energy Strategy] *the following local considerations will be taken into account by the Council in relation to any planning application … Impact on nature conservation, ecology, soil, hydrology, groundwater, archaeology, built heritage and public rights of way…*

CAEO (Objective) 03 states: *It is an objective of the Council to achieve a* ***reasonable balance*** *between responding to government policy on renewable energy and in enabling the wind energy resources of the county to be harnessed in an environmentally sustainable manner.*

Aside from the various areas of assessments in this report, as set out in the manner prescribed by the Commission's guidance on Strategic Infrastructure Development, Offaly County Council is requiring the:

(a) Removing of turbines 5, 11, 12, 13, 14 and 15 as shown on Drawing No. Figure 4-1 in Chapter 4 of the EIAR; and
(b) revising of the layout of the proposed development, so no internal roads and site access arrangements are located to the western ' spur' of the site to the N62 given the archaeological sensitivities of the site at this location in particular (where there exists an extremely high density of recorded monuments, comprising a Class 1 Togher, Class 2 Toghers and Class 3 Toghers).

It is important for the Commission to note that in relation to the above and with particular reference to the *reasonable balance* per CAEO-03:

- Co. Offaly currently has 520MW of operational wind energy developments.
- This has been delivered over a short period of time in the context of such developments nationally, i.e. the first windfarm was energised in 2014.
- 300MW alone has been energised since 2024.
- A further 85MW is permitted and awaiting construction imminently.
- A further 247MW is currently in the planning system (including the current application) - all SID applications to the Commission.
- Combined, the above (inclusive of the requirements to omit a large portion of the turbines within the current application) represents 9% of the entire country's Climate Action Plan / National Planning Framework 2030 wind energy target of 9,000MW.
- Co. Offaly represents 2.3% of the country's landmass.
- An additional c.266MW is in the public domain at the pre-planning stage.

- Therefore, the total 'pipeline' of wind energy development within Co. Offaly would represent 11% of entire country's Climate Action Plan / National Planning Framework 2030 wind energy target.
- Please note a number of applications or pending applications for further wind development located outside the Wind Development Areas in the County Development Plan are not included in these figures.
- Please also note that a significant portion of adjoining Counties' wind energy 'pipelines' (Offaly has 7 neighbouring counties) are located contiguous or close to the Offaly county boundary, with at least five projects crossing / sharing the county boundary. None of the turbines located in the adjacent counties are counted in the above.

County Offaly was the number 1 producer of renewable electricity in January and March 2026 and number 2 in February, having been in third place for much of the latter part of 2025. (Source: Green Energy Collective based on Eirgrid & SONI data). Until offshore wind energy ramps up in the early 2023's, having regard to the future wind and solar 'pipeline' in the county, it is predicted that this position will be retained into the 2030's.

The Commission is requested to note that Co. Offaly's solar energy 'pipeline' is similarly large and would represent approximately 14% of the entire country's Climate Action Plan / National Planning Framework 2030 target. It should be noted that the battery and other electricity storage 'pipeline' in Offaly is over 1GW, with approx. 50% of this already installed or nearing the construction stage. Conventional generation eg. gas-fired, biomass fired and distillate 'peaking' plants will total approx. 1.2GW once the recently permitted gas plant in Derrygreenagh is operational.

County Offaly has strongly embraced the transition to renewables in a plan-led manner, starting with its 2009 Wind Energy Strategy. Policy to encourage other technologies, including solar and bio-energy, followed in 2014, as did the policy requirement to strongly consider cumulative impacts. In all other policy respects the policy has remained consistent, in particular the concept of a 'reasonable balance', which, it must be noted was taken directly from the Governments (statutory) Wind Energy Guidelines, 2006. Currently the county is far ahead of its peers and is now beginning to see the 'economic dividend' eg. investment; employment-generating developments where clean energy is a key consideration and community benefit funding - arising from this consistent policy. For example, the Rhode Green Energy Park has proven to be the starting point / trigger for an extremely large Eco Energy Park immediately adjacent to it of which the Commission will be aware.

In addition to very positive and proactive policies and objectives in relation to renewables, the County Development Plan contains many others relating to heritage, amenities, communities, landscape, biodiversity, tourism, cycle and walking development etc. Relevant policies and objectives are listed in the body of this report. It is in the context of all of the above that the major re-appraisal of this particular project is required.

Therefore, the Council would strongly request the Commission to apply points 1 and 2 above to this proposal, in other words **a complete re-appraisal**, in addition to the other various issues raised within the report. This is to ensure that the *reasonable balance* per CAEO-03 is maintained.

Finally, Offaly County Council would like to state that the county is not now 'anti-wind' or 'anti-renewables'. Quite the contrary, the Council stands to be the leading, or one of the leading producers of renewable energy in Ireland for years to come. The Council has carried out a robust assessment of the proposed development in light of the totality of policies, objectives and aspirations within its County Development Plan.

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1. PURPOSE OF THIS REPORT

Due to the scale of the development which comprises of a 15-turbine wind farm with a generation capacity of c.90 MW, it has been determined by An Coimisiún Pleanála (hereafter referred to as 'ACP' or 'the Commission' as constituting Strategic Infrastructure Development (SID) under criteria set out in the Planning and Development Act 2000 (as amended) (hereafter referenced as PDA 2000).

ACP determined that 'Having regard to the size, scale and location of the proposed wind farm and related development, and to the policy context, it is considered that the proposed development of 15 (no) wind turbines with an estimated generating capacity of 90MW, a 220kV substation, 220kV overhead line connection to the existing 220kV Shannonbridge-Maynooth 220kV transmission line and associated development on a site at Lemanaghan and adjacent townlands in Co. Offaly, constitutes development that falls within the definition of energy infrastructure in the Seventh Schedule of the PDA 2000, thereby satisfying the requirements set out in Section 37A(1) of the Act'.The purpose of this report is to set out the Planning Authority's views on the effects of the proposed development on the environment and on the proper planning and sustainable development of the area of the authority, having regard in particular to the matters specified in Section 34(2) of the PDA 2000. The matters specified in Section 34(2)(a) are:

(i) the provisions of the development plan,
(ia) any guidelines issued by the Minister under Section 28,
(ii) the provisions of any special amenity area order relating to the area,
(iii) any European site or other area prescribed for the purposes of Section 10(2)(c),
(iv) where relevant, the policy of the Government, the Minister or any other Minister of the Government,
(v) the matters referred to in Subsection [34](4) (Planning conditions)
(va) previous developments by the applicant which have not been satisfactorily completed,
(vb) previous convictions against the applicant for non-compliance with this Act, the Building Control Act 2007 or the Fire Services Act 1981, and
(vi) any other relevant provision or requirement of this Act, and any regulations made thereunder.

In the interests of clarification at this stage, there are no Special Amenity Area Orders (item ii above) in County Offaly. The matters referred to in Subsection 34(4) of the PDA 2000 are conditions that may be relevant during the consideration of a normal planning application.
This report shall be submitted for the consideration of ACP as required under Section 37E(4) of the PDA 2000 (as amended).

The members may, by resolution, decide to attach recommendations to this report (as per Section 37E(6)). The views expressed at the meeting of the Council, where this report is considered, shall also be attached to this report (also per Section 37E(6)). This is known in the legislation as the "Meetings Administrators record" of the Council Meeting.

It should be noted in the outset that upon receipt of this SID application which constitutes a RED III application, the Commission is required to carry out a completeness check which is a mandatory assessment to verify that all necessary documentation for this renewable energy project application has been submitted. The Commission completed the completeness check on 29 April , 2026.

It should also be noted that ACP has absolute discretion to request revised proposals or further information in advance of a decision being made under Section 37F(1) of the PDA 2000, as amended.

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

2. SITE LOCATION AND DESCRIPTION

As outlined in the submitted documentation, the subject site is located in the rural townlands of Cooldorragh, Kilnagarnagh, Cappanalosset, Tumbeagh, Killaghintober, Castlearmstrong, Leabeg, Cornafurrish and Corrabeg, Lemanaghan, Kilnagoolny, Straduff, Lisdermot, Derrica More, Rosfaraghan, Rashinagh, Cor Mor and Cor Beg, Corbane, and Ballindown, approximately 3 kilometres (km) northeast of Ferbane and approximately 2.5 km southwest of the village of Ballycumber in Co. Offaly.

The boundary of the site is located c.700 metres north west of the monastic complex of Lemanaghan at its nearest point.

The site comprises 1,258 hectares and is approximately 5.4km in length (at its longest point) and 4.9km in width (at its widest point). It is described in the submitted documentation as being located in a peatland setting, comprising a mixture of bare cutaway peat, re-vegetated bare peat, degraded raised bog, scrub, low immature woodland and remnants of high bog.

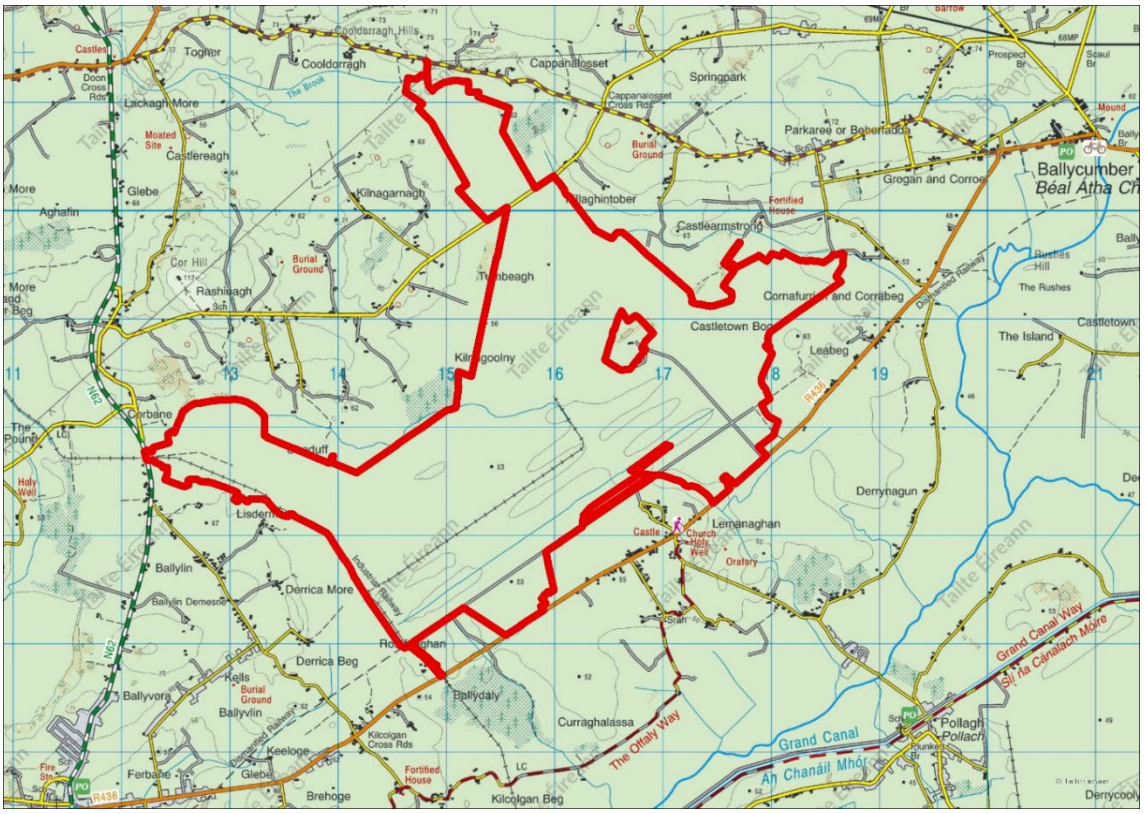


Figure 1: Site Location Map (prepared by Offaly County Council)

3. DESCRIPTION OF DEVELOPMENT

This section provides an overview of the proposed development as outlined in Chapter 4: Description of the Proposed Development contained within the accompanying Environmental Impact Assessment. The proposed development, for which consent is being sought for, is described in the submitted documentation as follow:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(xxi) Peat and Spoil Management;

(xxii) Site Drainage; Removal of c.1.02ha of immature woodland and c.0.64 hectares of scrub;
(xxiii) Biodiversity management and enhancement measures;
(xxiv) Operational stage site signage; and
(xxv) All ancillary apparatus and site development works above and below ground, including hard and soft landscaping and drainage infrastructure.

An EIAR and Natura Impact Statement (NIS) have been prepared in respect of the proposed development.

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

4. KEY RELEVANT POLICY

This section provides an overview of International/European; national; regional; and local policies which are relevant to the proposed development, as referred to in Chapter 2 of the submitted EIAR.

3.1 International and European Renewable Energy Policy

The following is deemed relevant to the assessment of the proposed development:

RED III (European Renewable Energy Directive (EU/2023/2413))

The European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. 274 of 2025) were signed by the Minister of Housing, Local Government & Heritage and came into force on the 6 August 2025. Subsequently, the European Union (Planning and Development) (Renewable Energy) (No.2) Regulations 2025 (S.I. 426 of 2025) were signed by the Minister on 11 of September and came into force on 25 September 2025.

RED III is the legal framework for the development of renewable energy across all sectors of the EU economy, supporting clean energy cooperation across EU countries. The Directive sets out a new target for share of energy from renewable sources in the EU of 42.5% for 2030 but is aiming for 45%. It requires Member States to set national contributions to meet the binding target as part of their integrated national energy and climate plans. The directive introduced new provisions to promote the use of renewable energy in heating and cooling, transport, and electricity sectors. It also enhanced the sustainability criteria for biofuels and set specific sub-targets for advanced biofuels and renewable transport fuels of non-biological origin.

European Wind Power Action Plan

The EU target of at least 42.5% of renewables by 2030 will require the installed capacity to grow from 204GW in 2022 to more than 500 GW in 2030. Globally, annual wind capacity additions should reach at least 329GW per year until 2030 to achieve net-zero emissions by 2050, more than quadrupling today's deployment levels of 75GW. The plan identifies six pillars of concerted action by EC Member States and industry, including acceleration of deployment through increased predictability and faster permitting, improved auction design, access to finance, creating a fair and competitive international environment, skills and industry engagement and Member State commitments.

REPowerEU Plan 2022 and Directive EU 2018/2001 (as amended)

This plan was prepared in response to the Russian invasion of Ukraine. It focuses on the need to end the EU's dependence on Russian fossil fuels and to tackle the climate crisis. It includes the accelerated

rollout of renewable energy. It amends the Directive on the Promotion of the Use of Energy from Renewable Sources (Directive EU 2018/2001) to require that 45% of energy is from renewable sources.

European Green Deal 2020

The European Commission, in December 2019, announced the European Green Deal which is aimed at making Europe the first climate neutral continent. The Deal seeks to achieve no net emissions of greenhouse gases by 2050, to decouple economic growth from resource use, and to leave no one behind. The EU introduced a set of proposals to align the EUs climate, taxation, energy, and transport policies to support achieving this aim.

The European Climate Law

This plan made the targets set under the European Green Deal legally binding, which also includes achieving a reduction in net greenhouse gas emissions of at least 55% by 2030. Climate neutrality by 2050 means achieving net zero greenhouse gas emissions for EU countries as a whole, mainly by 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.

Climate and Energy Policy Framework 2030

The Climate and Energy Policy Framework 2030 was adopted in 2014 and includes EU-wide targets and policy objectives for the period between 2021-2030. It seeks to drive continued progress towards a low-carbon economy and build a competitive and secure energy system that ensures affordable energy for all consumers and increase the security of supply of the EU's energy supply. It sets targets of at least 40% reduction in green-house gas emissions and at least 32% share of renewable energy from all energy consumed in the EU by 2030.

Effort Sharing Regulation (EU) 2018/842

The Effort Sharing Regulation (EU) 2018/842 lays down obligations on Member States with respect to minimum requirements to fulfil the EU's target of reducing its greenhouse gas emissions 30% below 2005 levels in 2030 in the various sectors and contributes to achieving the objectives of the Paris Agreement. A GHG reduction target of at least 30% applies to Ireland.

Energy Roadmap 2050

In December 2011, the European Commission published its Communication on the Energy Roadmap for 2050, which looks beyond 2020 targets. The energy agenda set out in the Communication sought to explore the challenges posed by delivering the EU's decarbonisation objective on moving to a competitive low carbon, climate resilient and environmentally sustainable economy by the year 2050 and commits the EU to reducing greenhouse emissions to 80-95% below 1990 levels by 2050.

3.2 National Policy

The following is deemed relevant to the assessment of the proposed development:

The National Planning Framework – Project Ireland 2040 - First Revision (April 2025)

The National Planning Framework (NPF) which sets out the strategic vision for Ireland' growth and development up to 2040 was published in 2018 with its first revision in April 2025. The NPF provides

the basis for the review and updating of regional strategies and local authority development plans to reflect matters such as updated housing figures, projected jobs growth and renewable energy capacity allocations.

Since the publication of the NPF in 2018, research and modelling by the Economic and Social Research Institute (ESRI) forecasts substantial population growth over the next decade. The NPF sets out an agenda to cater for a population of between 6.1 to 6.3 million people by 2040, and plan for approximately 50,000 units per annum over that period, doubling the previous 2018 first NPF goal.

The revised NPF highlights the need for the provision of services to support and enable housing development to take place, and to ensure that housing delivery is aligned with the provision of services and facilities for communities. This includes the provision of education, childcare, healthcare and recreational facilities to support the expansion of existing settlements and the creation of new sustainable communities.

There is a clearer focus on planning for climate change in the context of an accelerating climate crisis, and therefore renewable energy, under the revised NPF. Accordingly, the revised NPF has included new policies in relation to renewable energy, including the identification of regional renewable electricity capacity allocations in order to facilitate the accelerated roll-out and delivery of renewable electricity infrastructure for on-shore wind and solar generation development. Each Region must plan for sufficient wind and solar energy development to achieve both the MW targets set out in the revised NPF and the 2030 national renewable electricity generation targets.

The following NPF outcomes and policies are relevant to the proposed development:

- National Strategic Outcome 8 – Transition to a Carbon Neutral and Climate Resilient Society states that new energy systems and transmission grids will be necessary for a more distributed, more renewable 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. A target of 80% of the country's electricity needs from renewable sources by 2030 and to achieve net-zero emissions no later than 2050 is stated along with a strategic aim to increase renewable deployment in line with EU targets and national policy objectives up to 2030 and beyond.
- National Policy Objective 55: *To support, the progressive development of Ireland's offshore renewable energy potential, the sustainable development of enabling onshore and off-shore infrastructure including domestic and international grid connectivity enhancements, non-grid transmission infrastructure, as well as port infrastructure for the marshalling and assembly of wind turbine components and for the operation and maintenance of offshore renewable energy projects.*
- 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 75: *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.*

National Development Plan, 2025-2035

In July 2025, the updated National Development Plan (NDP) was published. This Plan underpins the NPF, and sets a framework for investment priorities which includes expenditure commitments to secure a wider range of Strategic Investment Priorities for example, decarbonising energy. Section 3.7 of the NDP refers to an 80% target by 2030 for renewable sources, which is described as an unprecedented commitment to the decarbonisation of electricity supplies.

National Energy and Climate Plan, 2021-2030

This Plan outlines Irelands energy and climate policies in detail for the period from 2021 to 2030 and looks onwards to 2050. The NECP is a consolidated plan which brings together energy and climate planning into a single process for the first time. It envisages a target of at least 55% renewable energy in electricity by 2030 (compared to 1990 levels).

Climate Action Plan 2024 (CAP 2024) and Climate Action Plan 2025 (CAP 2025)

CAP 2024 (December 2023) sets out a roadmap to deliver on Irelands climate ambition, of 51% reduction in GHG emissions from 2021-2030 and net-zero emissions by 2050. The plan aligns with the legally binding economy-wide carbon budgets and sectoral ceilings that were agreed by Government in July 2022. The Climate Action Plans have outlined precise goals for renewable energy, focusing on solar, onshore wind, and offshore wind generation. The Key Target for Onshore Wind generation is to achieve 6GW by 2025 and 9GW by 2030.

The Climate Change Advisory Council has made a number of recommendations for actions in the electricity sector in particular around the need for laws to ensure access to information from smart meters, private wire connections, phase-out of coal use, storage, demand management, and the need to streamline the planning process for windfarms. The Climate Action Plan 2025 builds upon CAP 2024 by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings and it should be read in conjunction with Climate Action Plan 2024.

National Landscape Strategy for Ireland, 2015-2025

The National Landscape Strategy was published by the Department of Arts, Heritage and the Gaeltacht in June 2015. The main objectives include the development of a National Landscape Character Assessment, which would provide a framework for the protection and management of change within the landscape in terms of its cultural, social, economic and environmental values. The aim is to seek

to achieve a balance between the social, cultural and economic needs and the environment and the landscape. It is stated that a National Landscape Character Assessment would ensure consistency between and within public authority functions and areas, would inform LCA's at a local level and would guide the development of landscape policy.

National Biodiversity Action Plan 2023 – 2030 (NBAP)

Ireland's 4th NBAP sets the biodiversity agenda for the period 2023 – 2030. The NBAP has a list of Objectives which promotes biodiversity as follows; Objective 1 Adopt a whole of government, whole of society approach to biodiversity; Objective 2 Meet urgent conservation and restoration needs; Objective 3 Secure nature's contribution to people; Objective 4 Enhance the evidence base for action on biodiversity; Objective 5 Strengthen Irelands contribution to international biodiversity initiatives. The Wildlife (Amendment) Act 2023 provides that every public body, as listed in the Act, is obliged to have regard to the objectives and targets in the National Biodiversity Action Plan.

3.3 National Guidelines

The following is deemed relevant to the assessment of the proposed development:

Wind Energy Development Guidelines for Planning Authorities (Department of the Environment, Heritage and Local Government, 2006)

These guidelines provide advice to the Commission and to planning authorities on wind energy development through the Development Plan and the development management process. They are intended to provide for consistency in the approach to wind energy development in terms of the identification of suitable locations for such development and in the determination of planning applications. It is stated that the assessment of such projects should be plan-led with clear guidance on where wind energy development should locate and what factors will be taken into account.

The matters to be considered in a planning application are set out in Chapter 4 of the guidelines. These include potential impacts on the built and natural heritage, ground conditions and drainage, visual and landscape impacts, local environmental impacts, (including noise, shadow flicker, electromagnetic interference), and adequacy of the local access road network. It is stated that best practice would suggest that an integrated planning application that includes grid connection information should ideally be submitted and that developers should be encouraged to engage in public consultation with the local community.

The potential environmental impacts arising from wind energy developments are discussed in Chapter 5. Guidance is given on matters such as noise, shadow flicker, natural heritage, archaeology, architectural heritage, ground conditions, aircraft safety and wind take. Whilst a setback distance is not established, it is stated that noise is unlikely to be a significant problem where the distance to the residential property is more than 500m. In respect of noise, the recommended standard is a lower fixed limit of 45dBA or a maximum increase of 5dBA above background noise and nearby noise sensitive locations, apart from very quiet areas where the daytime level is limited to 35-40dB(A). A night time limit of 43 dB(A) is recommended. In terms of shadow flicker, the recommended standard is a maximum of 30 hours per year or 30 minutes per day for dwellings and offices within 500m. It is further stated that at distances of greater than 10 rotor diameters, the potential for shadow flicker is very low.

Chapter 6 provides guidance on siting and design of wind energy development in the landscape. This includes advice on siting, spatial extent and scale, cumulative effect, spacing of turbines, layout of turbines and height of turbines. Guidance is also given regarding landscape character types as a basis for siting and design considerations.

Draft Revised Wind Energy Development Guidelines (Dept. of Housing, Planning & Local Government, 2019)

The Department of Housing Planning and Local Government published Draft Revised Wind Energy Development Guidelines in December 2019. These guidelines were intended to supersede the 2006 Guidelines, but a final version of these guidelines has yet to be formally published.

The Draft 2019 Guidelines provide reference to a lot of best practice and updated guidance for assessing wind energy development.

The proposed key revisions include the following;

- New more stringent noise standards and noise monitoring requirements for wind energy developments in order to reduce the noise nuisance for local residents and communities
- A setback distance for visual amenity purposes of 4 times the tip height should apply between a wind turbine and the nearest point of the curtilage of any residential property in the vicinity of the proposed development, subject to a mandatory minimum setback of 500 metres. Exceptional circumstances for lower setback where the occupiers / owners of the properties are agreeable.
- Mandatory community engagement by the developer in relation to wind farm developments and the preparation of a 'Community Report' detailing the methods/level of local community engagement which shall be submitted as part of a wind farm planning application
- The control of shadow flicker in the form of specific planning condition(s) attached to any permitted wind farm application.
- The consideration of the grid connection layout and design as part of wind farm applications.
- Opportunities for community gain or a community dividend for local communities to be established as part of a wind farm development.

Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2009)

National guidance for planning authorities on Appropriate Assessment of plans and projects in Ireland was published by the Department of Environment, Heritage and Local Government (DEHLG) in 2009. It was updated in 2010, by replacing the term "Statement for Appropriate Assessment" with "Natura Impact Statement" or "NIS".

This guidance is intended to assist and guide planning authorities in the application of Article 6(3) and 6(4) of the Habitats Directive as it relates to their roles, functions and responsibilities in undertaking Appropriate Assessment of plans and projects. It applies to plans and projects for which public authorities receive an application for consent, and to plans or projects which a public authority wishes to undertake or adopt.

The guidelines set out the different steps and stages that are needed in establishing whether a plan or project can be implemented without adversely affecting the integrity of a Natura 2000 site. The guidance addresses issues of mitigation and avoidance of impacts, and also the Article 6(4) derogation provisions for circumstances in which there are no alternatives and for which there are imperative reasons of overriding public interest (IROPI) requiring a plan or project to proceed.

Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (Dept. of Housing, Planning & Local Government, August 2018)

The publication of these Guidelines coincided with the making of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) and the coming into operation of the Regulations on 1st September 2018 in order to transpose the Directive into Irish planning law. The Guidelines replaced Guidelines for Planning Authorities and An Bord Pleanála (now 'ACP') on carrying out environmental impact assessment issued by the Department of the Environment, Community and Local Government in March 2013. The purpose of the Guidelines is to give practical guidance on procedural issues and the EIAR process arising from the requirements of Directive 2014/52/EU and to assist with the achievement of a consistency of approach in the implementation of the Directive.

Guidelines on the information to be contained in Environmental Impact Assessment Reports (EPA, May 2022)

Originally published in 2002, these guidelines now contain up to date references to other Irish and EU guidance and publications to be considered when preparing an Environmental Impact Assessment Report (EIAR). The guidelines contain the systematic approach, standard descriptive methods and effect descriptions that can be used by developers. This ensures that all the likely significant effects are adequately considered and clearly communicated.

3.4 Regional Policy

Eastern & Regional Assembly - Regional Spatial & Economic Strategy 2019-2031 (RSES)

The Eastern and Midlands Regional Assembly (EMRA), established in 2015, comprises the 12(no) local authorities located within Dublin and the Eastern & Midland counties. In June 2019, the Assembly adopted its Regional Spatial and Economic Strategy (RSES). The primary purpose of the RSES is to support the implementation of Project Ireland 2040 and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the Region.

The RSES sets out a vision based across 3(no.) key guiding principles: healthy placemaking, climate change, and economic opportunity.

A total of 16 Regional Strategic Outcomes (RSOs) are set out in the RSES which cross referenced and aligned with the 3 key principles of the RSES. They have been developed in iteration with the Strategic Environmental Outcomes of the parallel Strategic Environmental Assessment process. Of particular relevance to the proposed development is the following RSOs:

No. 8 Build Climate Resilience Ensure the long-term management of flood risk and build resilience to increased risks of extreme weather events, changes in sea level and patterns of coastal erosion to protect property, critical infrastructure and food security in the Region (RSO 8)
No. 9 Support the Transition to Low Carbon and Clean Energy Pursue climate mitigation in line with global and national targets and harness the potential for a more distributed renewables-focussed energy system to support the transition to a low carbon economy by 2050 (RSO 9)

Underpinning the 3 guiding principles are a series of Regional Policy Objectives (RPO's). The following RPO's are of particular relevance to the proposed development:

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

RPO 10.20: Support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the Region and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy. This Includes the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity and gas transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and the planning process.

RPO 10.22: Support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned growth and transmission/distribution of a renewable energy focused generation across the major demand centres to support an island population of 8 million people.

3.5 Local Policy

The following locally adopted plans and policies are deemed relevant to the assessment of the proposed development.

Offaly Local Authority's Climate Action Plan 2024 – 2029

Offaly County Council's Climate Action Plan (OCAP) accords with the Climate Action and Low Carbon Development (Amendment) Act 2021. It aligns with Government's national climate objectives, which seek the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy by 2050. The OCAP includes actions which aim to reduce Offaly County Council's emissions across its own infrastructure and assets by 51% by 2030 and create pathways towards enabling sectoral emission reductions across the county.

Offaly County Development Plan 2021-2027 County Wind Energy Strategy

A County Wind Energy Strategy (WES) forms part of the County Development Plan. The Strategy constitutes a plan led approach to wind energy development in County Offaly. It sets out areas 'open for consideration' for wind energy developments and considerations for the evaluation of wind energy planning applications.

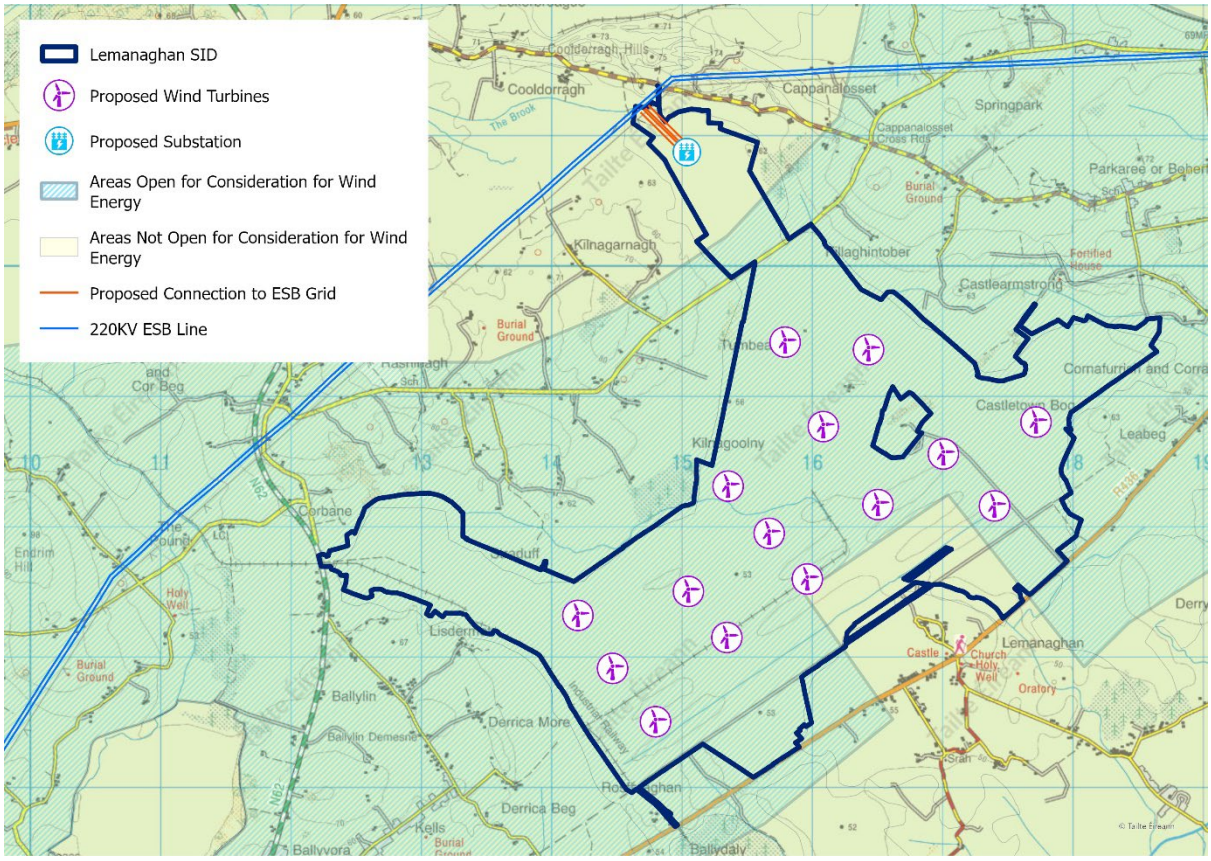


Figure 5: OCC Wind Energy Strategy Map with subject site location indicated.

The subject site is largely located in an area demoted in the Wind Energy Strategy as *'Deemed Open for Consideration for Wind Energy Developments'*. The WES states in relation to such areas:

These areas are open for consideration for wind energy development as these areas are characterised by low housing densities, do not conflict with European or National designated sites and have the ability by virtue of their landscape characteristics to absorb wind farm developments. Notwithstanding this designation, wind farm developments in these areas will be evaluated on a case by case basis subject to criteria listed in Development Management Standard 109 contained in Chapter 13 of Volume 1 of this County Development Plan and the Section 28 Wind Energy Development Guidelines.

The site encompasses a pocket of lands to the north and a pocket of lands to the south which are located within a wider area which is delineated as 'Area Not Deemed Suitable for Wind Energy Developments' as per the WES. The WES states in relation to such area that:

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

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

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

It is noted that the following paragraph within Table 3 of the Offaly County Wind Energy Strategy which immediately precedes Map 10 – Wind Energy Strategy Designations in the WES, states that:

"Wind energy developments in areas considered 'Open for Consideration for Wind Energy Development' following the below analysis does not imply 'automatic approval' as each proposal for development will be considered on their individual merits at planning application stage subject to the normal environmental and appropriate assessment, and compliance with the relevant policies and Offaly County Development Plan 2021-2027 County Wind Energy Strategy objectives, development management standards as set out in the Volume 1 of this County Development Plan and section 28 Ministerial Guidelines".

Offaly County Development Plan 2021-2027

Chapter 3 of the Offaly County Development Plan 2021-2027 (OCDP) outlines the Climate Action and Energy strategy for the county with the strategic aim *'to achieve a transition to an economically competitive, low carbon climate resilient and environmentally sustainable county, through reducing the need to travel, promoting sustainable settlement patterns and modes of transport, and by reducing the use of non-renewable resources, whilst recognising the role of natural capital and ecosystem services in achieving this'.*

'It is an objective of the Council to achieve a reasonable balance between responding to government policy on renewable energy and in enabling the wind energy resources of the county to be harnessed in an environmentally sustainable manner' (Objective CAEO-03, CDP).

Table 3.1 outlines the targets for wind energy, solar energy and battery storage demonstrating County Offaly's contribution to realising overall national targets.

Table 3.1 Renewable Energy Targets for County Development Plan period

Wind Energy Target by end of Plan Period: 466.3 MW
Solar Energy Target by end of Plan Period: 145 MW
Battery Storage Target by end of Plan Period: 445 MW

Section 3.2.6 Wind Energy:

Site suitability is an important factor in determining the suitability of wind farms having regard to possible adverse impacts associated with, for example, residential amenities, landscape, including views or prospects, wildlife, habitats, designated sites, protected structures or bird migration paths and compatibility with adjoining land uses.

The Council is therefore required to achieve a reasonable balance between responding to overall positive Government policy on renewable energy and enabling the wind energy resources of the Planning Authority's area to be harnessed in a manner that is consistent with proper planning and sustainable development.

The Council recognises that community ownership of wind energy projects enables local communities to benefit directly from local wind energy resources being developed in their local areas, ensuring long-term income for rural communities.

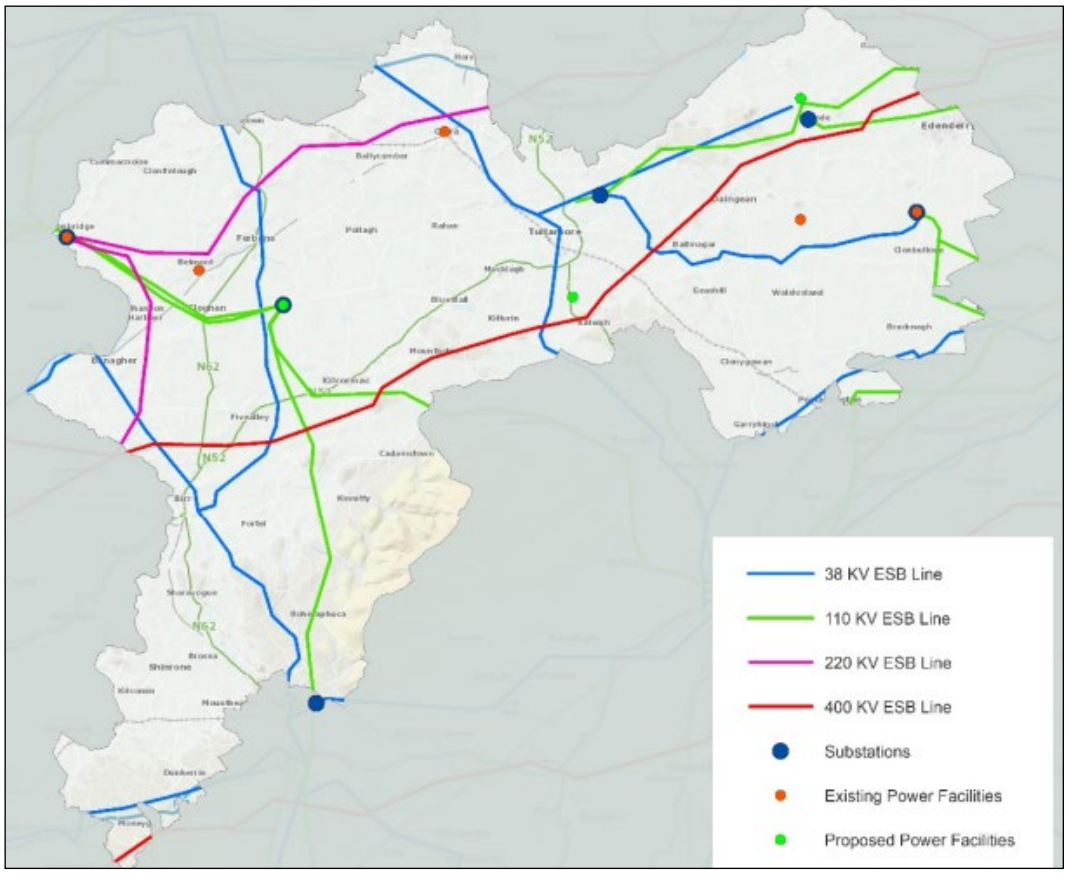


Figure 6: Extract from OCDP – Figure 3.3 Existing Electricity Infrastructure in Co. Offaly.

3.9 Climate Action and Energy Objectives

Renewable Energy

CAEO-03 It is an objective of the Council to achieve a reasonable balance between responding to government policy on renewable energy and in enabling the wind energy resources of the county to be harnessed in an environmentally sustainable manner.

CAEO-04 It is an objective of the Council to ensure the security of energy supply by supporting the potential of the wind energy (and other renewable) resources of the County in a manner that is consistent with proper planning and sustainable development of the area.

CAEO-05 It is an objective of the Council to implement the Council's Wind Energy Strategy as follows:

1. In 'Areas Deemed Open for Consideration for Wind Energy Development' as identified in Map No. 10 'Wind Energy Strategy Designations', the development of windfarms and smaller wind energy projects will be considered;
2. In all other areas, wind energy developments shall not normally be permitted – except as provided for under relevant exemption provisions in the Planning and Development Regulations 2001 (as amended); and
3. Applications for re-powering (by replacing existing wind turbines) and extension of existing and permitted wind farms will be assessed on a case by case basis and will be subject to criteria listed in

Development Management Standard 109 contained in Chapter 13 of Volume 1 of this County Development Plan and the Section 28 Ministerial Wind Energy Development Guidelines.

Section 3.8 Climate Action and Energy Policies

- *CAEO-04 It is an objective of the Council to ensure the security of energy supply by supporting the potential of the wind energy (and other renewable) resources of the County in a manner that is consistent with proper planning and sustainable development of the area.*
- *CAEO-05 It is an objective of the Council to implement the Council's Wind Energy Strategy as follows:*
  1. *In 'Areas Deemed Open for Consideration for Wind Energy Development' as identified in Map No. 10 'Wind Energy Strategy Designations', the development of windfarms and smaller wind energy projects will be considered;*
  2. *In all other areas, wind energy developments shall not normally be permitted – except as provided for under relevant exemption provisions in the Planning and Development Regulations 2001 (as amended); and*
  3. *Applications for re-powering (by replacing existing wind turbines) and extension of existing and permitted wind farms will be assessed on a case by case basis and will be subject to criteria listed in Development Management Standard 109 contained in Chapter 13 of Volume 1 of this County Development Plan and the Section 28 Ministerial Wind Energy Development Guidelines.*

Climate Change Adaptation and Mitigation

- *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-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.*

Reasonable Alternatives and Existing Infrastructural Assets

- *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.*

Renewable Energy

- *CAEP-25: It is Council policy to encourage and facilitate the production of energy from renewable sources, such as from bioenergy, waste material, solar, hydro, geothermal and wind energy, subject to proper planning and environmental considerations.*

Wind Energy

- *CAEP-37: It is Council policy to recognise the importance of wind energy as a renewable energy source which can play a vital role in achieving national targets in relation to reductions in fossil fuel dependency and therefore greenhouse gas emissions.*
- *CAEP-38: It is Council policy that in assessing planning applications for wind farms, the Council shall:*
  - *have regard to the provisions of the Wind Energy Development Guidelines 2006, the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change 2017 and the Draft revised Wind Energy Guidelines 2019 which are expected to be finalised in the near future;*
  - *have regard to 'Areas Open for Consideration for Wind Energy Developments' in the Wind Energy Strategy Designations Map from the County Wind Energy Strategy;*
  - *the impact of the proposed wind farm development on proposed Wilderness Corridors as detailed in Objective BLO-28 of Chapter 4;*
  - *have regard to Development Management Standard 109 on wind farms contained in Chapter 13 of this Plan; and*
  - *have regard to existing and future international, European, national and regional policy, directives and legislation.*

Chapter 4 outlines the Biodiversity and Landscape strategy for the county. The proposed site is located within an area classified as 'moderate sensitivity areas' in the OCDP.

Section 4.14.1 Landscape Sensitivity

The sensitivity of a landscape is the measure of its ability to accommodate change or intervention without suffering unacceptable effects to its character and values. The sensitivity of the landscapes of County Offaly varies and is thereby classified within the following sensitivity classes: Low, Moderate and High Sensitivity.

Section 4.16 Biodiversity and Landscape Policies

Designated and Non-Designated Sites

- *BLP-01 It is Council policy to protect, conserve, and seek to enhance the county's biodiversity and ecological connectivity.*
- *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.*
- *BLP-04 It is Council policy to protect and maintain the conservation value of all existing and future Natural Heritage Areas, proposed Natural Heritage Areas, Nature Reserves, Ramsar Sites, Wildfowl Sanctuaries and Biogenetic Reserves in the county.*

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.

Figure 8: Table 4.19 Moderate Sensitivity Areas in County Offaly – OCDP 2021 – 2027.

Peatlands

- *BLP-14 It is Council policy to protect the county's designated peatland areas and landscapes, including any historical walkways through bogs and to conserve their ecological, archaeological and cultural heritage and to develop educational heritage.*

Waterways, Lakes and Wetland Landscapes

- *BLP-20 It is Council policy to preserve riparian buffer strips free from development by reserving a minimum of 10 metres either side of all watercourses (measured from top of bank) with the full of the protection determined on a case by case basis by the Council, based on site specific characteristics and sensitivities.*
- *BLP-23 It is Council policy to consider the Waterways Corridor Study 2002 and protect the recreational, educational and amenity potential of navigational and non-navigational waterways within the county, such as the Grand Canal Corridor, towpaths and adjacent wetland landscapes, taking into account more recent heritage and environmental legislation (including the SEA Directive) and environmental policy commitments.*

Landscape

- *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.*

- *BLP-40 It is Council policy to ensure that consideration of landscape sensitivity is an important factor in determining development uses.*

Section 4.17 Biodiversity and Landscape Objectives

Natural Capital

- *BLO-01 It is an objective of the Council that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation and the sustainable management of County Offaly's natural capital.*
- *BLO-04 It is an objective of the Council to ensure that the impact of development within or adjacent to national designated sites, Natural Heritage Areas, proposed Natural Heritage Areas, Ramsar Sites and Nature Reserves likely to result in significant adverse effects on the designated site is assessed by requiring the submission of an Ecological Impact Assessment prepared by a suitably qualified professional, which should accompany planning applications.*

Peatlands

- *BLO-10 It is an objective of the Council to require the preparation and submission of a Hydrological Report/Assessment for significant developments within and in close proximity to protected raised bogs and to take account of same in the assessment of impacts on the integrity of peatland ecosystems.*

Waterways, Lakes and Wetland Landscapes

- *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'.*

Landscape

- *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.*

Chapter 6 outlines the context of Tourism and Recreational Development in the county and relevant policies and objectives for the six-year period of the County Development Plan.

Section 6.5.7 Greenways

The Council published 'A Strategy for Walking and Cycling in Offaly; Connecting People Connecting Places' (2015), which set the vision for County Offaly to connect to, embrace and build on the opportunities for walking and cycling in the county. Following from this the 'Feasibility Study on the Development of a Major Cycling Destination in the Midlands of Ireland' was published in 2016. Chapter 8 Sustainable Transport Strategy also addresses walking and cycling. The Council recognises the importance of continuing to extend and link in the form of a network, greenways and peatways in the interests of sustainable mobility, activity tourism, transition to a low carbon and climate resilient society, enhancing amenities, strengthening rural economies and communities, health and wellbeing, job creation and settlement connectivity. In light of this the council working in conjunction with key

stakeholders, promotes the establishment of walking / cycling ways along rivers, canals, disused railway lines and peatlands indicated in Figure 6.12 and Figure 6.13 below.

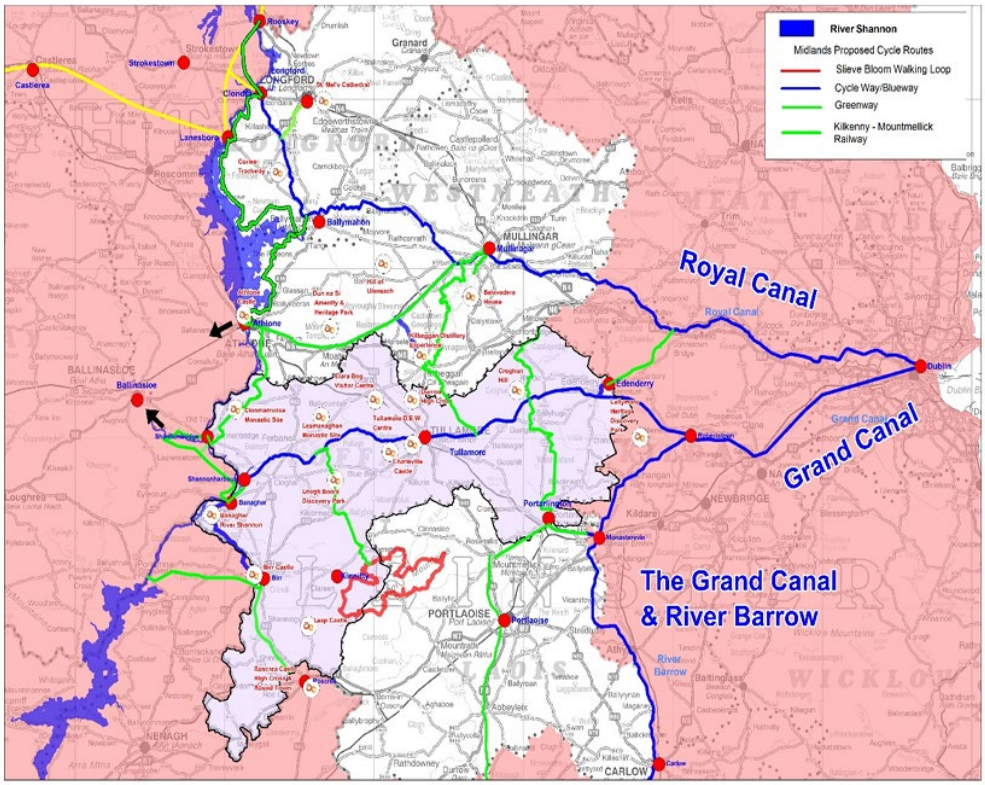


Figure 6.12 Proposed Midlands Cycle and Walking Routes

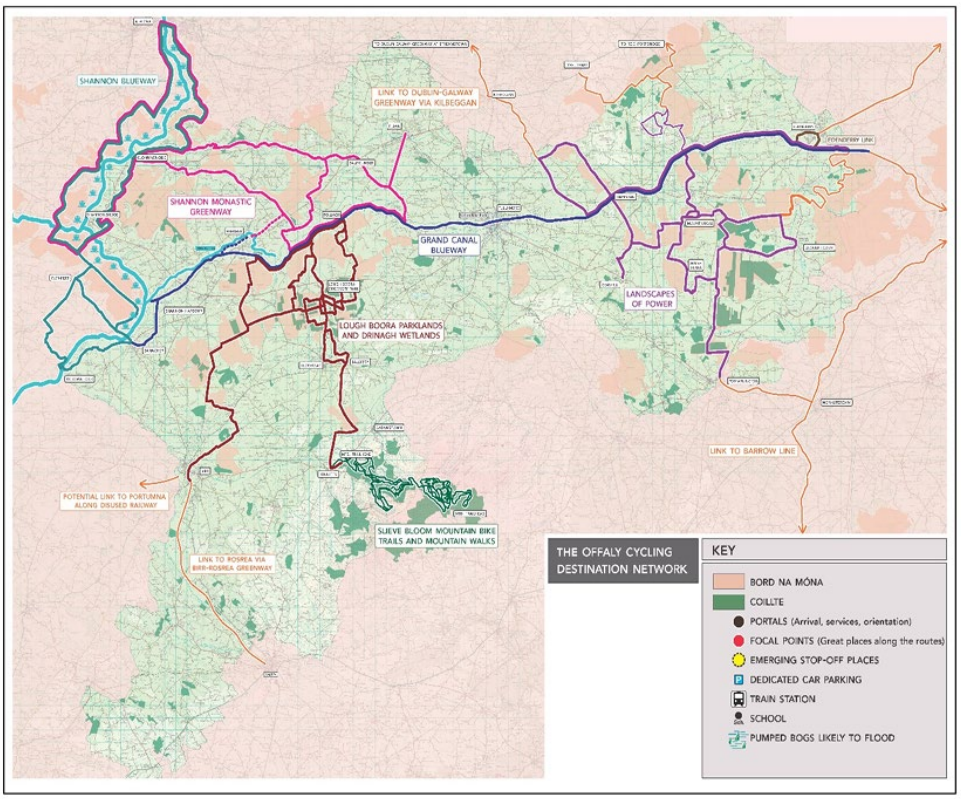


Figure 6.13 Midlands Cycling Destination, Offaly Network Map

6.7 Tourism Policies

TRP-22: *It is Council policy to promote the 'Feasibility Study on the Development of a Major Cycling Destination in the Midlands of Ireland' (2016) in conjunction with Bord na Móna and Coillte in accordance with 'Outdoor Recreation Plan for Public Lands and Waters in Ireland' 2017-2021 and in particular to recognise Tullamore as a hub in this respect.*

6.8 Tourism Objectives

TRO-15: *It is an objective of the Council to implement the 'Feasibility Study on the Development of a Major Cycling Destination in the Midlands of Ireland' (2016) in conjunction with Bord na Móna, Coillte, Waterways Ireland, the Office of Public Works and the Product Development Group, in accordance with the Offaly Tourism Statement of Strategy 2017-2022.*

TRO-17: *It is an objective of the Council to protect potential greenway, blueway and peatway routes (i) along and in proximity to abandoned rail lines and (ii) routes identified in Figure 6.13 'Midlands Cycling Destination, Offaly Network Map' from inappropriate development that could compromise the delivery of a cycling or walking route in the future.*

Chapter 8 outlines the Sustainable Transport Strategy for the county over the six-year period.

Section 8.8 Sustainable Transport Strategy Policies - Roads

- *SMAP-24: It is Council policy to maintain and protect the safety, strategic transport function, capacity and efficiency of national roads, motorways and associated junctions and in accordance with Strategic Planning and National Roads Guidelines 2012 or any subsequent edition.*
- *SMAP-28 It is Council policy to ensure that developments which have the potential to generate significant traffic movement are subject to a Traffic and Transportation Assessment, Quality Audit and Road Safety Audit as appropriate.*
- *SMAP-31 It is Council policy that the capacity and efficiency of the road network drainage regimes in County Offaly will be safeguarded for road drainage purposes.*

Section 8.9 Sustainable Transport Strategy Objectives – Roads

- *SMAO-15: It is an objective of the Council to improve and maintain regional and county roads in line with the annual roads programme and allocated budgets.*

Chapter 10 outlines the policies and objectives that apply to the county's historic landscapes and heritage which is pertinent in the assessment of the proposed SID application, given the subject site's proximity to the Lemanaghan Monastic Complex.

10.10.4 Monastic Sites

There are twenty-three recorded Early Christian Monasteries in the county. Conservation Management Plans have been prepared for Clonmacnoise, Leamanaghan, Durrow, Rahan and Killeigh. The Council will have regard to these plans when considering development within their boundaries and will carefully consider other sites which may not yet have conservation plans completed.

Lemanaghan

The historic complex at Lemanaghan, with its focus at the early monastic site dedicated to St Managhan, is situated on the R436 between Ballycumber and Ferbane at the junction of the road to Pollagh. These monuments occupy an upland area in Lemanaghan Bog which is bordered to the south by the callows of the River Brosna. Surrounding them is an exceptional number of archaeological find sites, many relating to a complex infrastructure of trackways or toghers, which were built and repaired over several centuries. It consists of a medieval church, St. Mellas Cell, Holy Well and Togher, and a cluster of relatively small dwellings, the largest of which, Lemanaghan House, is to the south-west of the monastic site. The Heritage Council prepared a Conservation Plan for Lemanaghan in 2007. The Planning Authority will have regard to this plan when assessing applications that are within this area or in close proximity to this area.

Archaeological Heritage

BHP-33 *It is Council policy to support and promote the protection and appropriate management and sympathetic enhancement of the county's archaeological heritage within the Plan area, in particular by implementing the Planning and Development Act 2000 (as amended) and the National Monuments Act 1930 (as amended).*

BHP-34 *It is Council policy to seek to promote awareness of and access to archaeological sites in the county where appropriate.*

BHP-35 *It is Council policy to consult with the National Monuments Service of the Department of Culture, Heritage and the Gaeltacht (DCHG) in relation to archaeological sites within and/or adjoining a proposed development.*

BHP-36 *It is Council policy to facilitate the identification of important archaeological landscapes in the county.*

BHP-37 *It is Council policy that any development that may, due to its size, location or nature, have implications for archaeological heritage (including both sites and areas of archaeological potential / significance) shall be subject to an archaeological assessment. When dealing with proposals for development that would impact upon archaeological sites and/or features, there will be presumption in favour of the 'preservation in situ' of archaeological remains and settings, in accordance with Government policy. Where permission for such proposals is granted, the Planning Authority will require the developer to have the site works supervised by a licenced archaeologist.*

Monastic Sites

BHP-43: *It is Council policy to support and promote the protection and appropriate management of all monastic sites in the county.*

Archaeological Heritage

BHO-05 It is an objective of the Council to protect archaeological sites and monuments, and archaeological objects, which are listed in the Record of Monuments and Places, and to seek their preservation in situ (or at a minimum, preservation by record) through the planning process.

Chapter 13 sets out the general development management principles and standards to be applied in ensuring that future development is in accordance with the policies and objectives set out elsewhere within the OCDP. The following development management standards (DMS) are relevant to the proposed development:

DMS-97 Safe Sight Distances required for access onto National, Regional and Local Roads

The following safe sight distances, shall be provided from vehicular entrances on the road network;

- *Local Tertiary Roads: 60 metres;*
- *Local Secondary Roads: 90 metres;*
- *Local Primary Roads: 120 metres;*
- *Regional Roads: 150 metres; and*
- *National Roads: 230 metres.*

As set out by design standards detailed in TII publications, sight distances shall be measured from a point 2.4 metres from the road edge at the proposed access to a point at the near edge of the approaching carriageway. The standard for local roads is at the discretion of the Planning Authority and may be reduced where it would not give rise to a specific traffic hazard. DMS-97 standards apply only to locations other than those to where DMURS applies.

DMS-105 Traffic and Transport Assessments and Road Safety Audits

Developers will be required to provide a detailed Transport and Traffic Assessment (TTA), as carried out by competent professionals in this field, where new developments will have a significant effect on travel demand and the capacity of surrounding transport links in accordance with the thresholds set out in Tables 2.1, 2.2 and 2.3 of Traffic and Transport Assessment Guidelines (Transport Infrastructure Ireland, 2014). When preparing the TTA's regard should be had to the provision of the;

- *Traffic and Transport Assessment Guidelines (2014);*
- *Design standards detailed in TII publications; and*
- *Traffic Management Guidelines (Dublin Transportation Office and Department of Transport, 2019).*

Where a Transport and Traffic Assessment identifies necessary on and off-site improvements for the development to be able to proceed, the developer will be expected to fund the improvements by entering into a formal agreement with the Council. A Road Safety Audit shall be required for significant developments in accordance with the Road Safety Audit Guidelines (TII Publication).

DMS-106 Flood Risk Assessments Flood Zones and Appropriate Uses

The table below indicates the types of land uses that are appropriate in each of the Flood Zones identified within the Plan area, in accordance with the 2009 Flood Risk Management Guidelines for Planning Authorities and Departmental Circular PL2/2014 (or any updated/superseding legislation or policy guidance). Where developments/land uses are proposed that are considered inappropriate to the Flood Zone, then a Development Management Justification Test and site-specific Flood Risk Assessment will be required in accordance with The Planning System and Flood Risk Management Guidelines 2009 (and as updated).

Note (refer to Flood Risk Management Guidelines 2009 and 'SFRA for the Offaly County Development Plan 2021-2027' for additional detail):

- *Highly Vulnerable Development – Houses, schools, hospitals, residential institutions, emergency services, essential infrastructure, etc.*
- *Less Vulnerable Development – Economic uses (retail, leisure, warehousing, commercial, industrial, non-residential institutions, etc.), land and buildings used for agriculture or forestry, local transport infrastructure, etc.*

- *Water Compatible Development – Docks, marinas, wharves, waterbased recreation and tourism (excluding sleeping accommodation), amenity open space, sports and recreation, flood control infrastructure, etc.*

Site-Specific Flood Risk Assessments

The detail of these site-specific FRAs will depend on the level of risk and scale of development but it is advised that The Planning System and Flood Risk Management, Guidelines for Planning Authorities (DEHLG and OPW, 2009) (or any superseding document) and available information from CFRAM Studies, including existing and emerging CFRAMS mapping (including National Indicative Fluvial mapping) and the most up to date CFRAM Programme climate scenario mapping shall be consulted with to this effect. 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.

DMS-107 Undergrounding of Services

All services, including ESB, telephone and television cables shall be placed underground, where possible. Service buildings or structures shall be sited as unobtrusively as possible and must be screened. Proposals should demonstrate that environmental impacts including the following are minimised:

- *Habitat loss as a result of removal of field boundaries and hedgerows (right of way preparation) followed by topsoil stripping (to ensure machinery does not destroy soil structure and drainage properties);*
- *Short to medium-term impacts on the landscape where, for example, hedgerows are encountered;*
- *Impacts on underground and underwater archaeology;*
- *Impacts on soil structure and drainage; and*
- *Impacts on surface waters as a result of sedimentation.*

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.*

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.

An assessment against the above criteria will be considered under the relevant subheadings as part this overall report.

5. RELEVANT PLANNING HISTORY

This section provides a review of the relevant planning history associated with the subject site.

Planning Authority	Pl. Ref.	Description	Planning Authority Decision
An Coimisiún Pleanála	SU19.323676	Substitute Consent under the provisions of Section 177E of the Planning and Development Act 2000 (as amended) for peat extraction and ancillary works.	Pending Decision [Case was due to be decided by 31/03/2026]

		Remedial Natura Impact Statement (rNIS) and Remedial Environmental Impact Assessment Report (rEIAR) was submitted with this application.	
Offaly County Council	24/75	Continued use of an existing guyed wind monitoring mast, with instruments, 100m in height for a further period of three years. The purpose of the mast is to assess the suitability of the company' s adjacent lands for windfarm development. Previous planning application reference number: PL16/341	Granted - 17/09/2024
Offaly County Council	16/341	The erection of a guyed wind monitoring mast, with instruments, up to 100m in height. The purpose of the proposed mast is to assess the suitability of the company's adjacent lands for wind farm development	Granted – 09/02/2017
Offaly County Council	21/208	Renovation & extension of existing derelict dwelling, construction of a domestic garage, installation of an effluent treatment system, access to the public road at an existing entrance and all ancillary works	Granted – 09/02/2022

Table 2.3 Valid Wind Farm Applications within 25km

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

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

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

Figure 9: Extract from Table 2.3: Valid Wind Farm Applications within 25km as contained in Chapter 2 of the Applicant's EIAR.

4.3 Enforcement Information Relating to the Subject Site

None shown on planning register.

6 DESIGNATIONS

6.1 European – Special Areas of Conservation (SACs) and Special Protected Areas (SPAs)

There are no European Designated sites within the application area. The nearest European Designated site to the subject site is Ferbane Bog Special Conservation Area (SAC) which is located approximately 1.3 km to the southwest of the subject site. The Clara Bog SAC (being the next nearest European site) is located approximately 3.16 km to the east of the subject site.

6.2 National Designations - Natural Heritage Areas (NHAs)/Proposed Natural Heritage Areas (pNHA)

There are no NHAs or pNHAs within the application area. The nearest National Designated sites are the Clonydonnin Bog Natural Heritage Area (NHA) which is located c.2.52 km north west, the Grand Canal pNHA which is located c.2.79 km south and the Clara Bog NHA which is located c.3.13 km north east of the application area.

6.3 Special Amenity Area Orders/Protected Structures/Architectural Conservation Areas

The Planning Authority confirms that no special amenity area orders, protected structures or Architectural Conservation Areas are located within the proposed site. Chapter 13, Cultural Heritage, of the EIAR which accompanies the application provides a details and an examination on protected structures and national monuments located within the vicinity of the proposed development.

7 PUBLIC SERVICES

7.1 Water supply

2(no.) bored well are proposed for the proposed electrical substation.

7.2 Sanitary facilities

A sealed wastewater storage tank will be used for effluent from the staff welfare facilities in the substation IPP and GIS buildings. Effluent will be removed from site by a permitted waste collector to a licenced waste facility.

7.3.1 Surface water

The proposed surface water drainage system is outlined as a combination of silt traps and settlements ponds, field drains/main drains, settlement ponds and off-site drains, streams and rivers.

8 FLOOD RISK ASSESSMENT AND WATER FRAMEWORK DIRECTIVE & ASSOCIATED REGULATIONS

8.1 Flood Risk Assessment

A Flood Risk Assessment (FRA) for the proposed development has been completed and submitted in Appendix 9-1 that accompanies the EIAR. This Site-Specific Flood Risk Assessment (SSFRA) states that while the National Indicative Fluvial Flood Maps do record some fluvial flood zones within the proposed project site and in the vicinity of the Lemanaghan Stream, having carried out on site surveys, it was found that drainage in the area had been extensively modified to facilitate historical peat activities and by increasing the finished floor level of the proposed onsite substation, a vulnerable use as per the Flood Risk Management Guidelines, that the risk of flooding is negligible.

In addition, it is noted that the SFRA concludes that the risk of the Proposed Wind Farm contributing to downstream flooding is also very low, as the long-term plan for the Lemanaghan Bog, in which the majority of the Proposed Project site is located, is to retain and slow down drainage from the bogs, and this will result in sections of the Proposed Project site being wetter for longer and therefore promoting more Fen-like conditions.

8.2 Water Framework Directive & Associated Regulations

Appendix 9-3 that accompanies the EIAR contains a Water Framework Directive Report which concludes that as;

- the proposed development does not involve any significant abstraction of groundwater or alteration of drainage patterns,
- there is no direct discharge from the proposed development to downstream receiving waters and;
- the mitigation measures proposed to protect groundwater quality within the Proposed Project site during the construction, operational and decommissioning phases of the proposed development,

there will be no change quantitatively (volume) or qualitatively (chemical) in SWBs (Surface Water Bodies) and GWBs (Groundwater Bodies) in the underlying GWB or downstream SWBs resulting from the Proposed Project.

ACP is the competent authority in determining on WFD compliance with respect to the submitted application.

9 ENVIRONMENT IMPACT ASSESSMENT REPORT (EIAR) SUMMARY

In this case, An Coimisiún Pleanála is the competent authority for the purposes of carrying out an Environmental Impact Assessment (EIA). The following section gives the Planning Authority's views in relation to the adequacy of the EIAR submitted as part of this SID planning application.

The EIAR is considered to be set out in a clear format and the Non-Technical Summary (NTS) is considered to be generally adequate. Throughout the different chapters, the EIAR outlines the existing environment providing a description of the context, character, significance and sensitivity of the receiving (baseline) environment in order to predict the likely significant effects of the project and the likely evolution of the environment in the absence of the project.

Chapter 1: Introduction

The introduction sets out and refers to the site location, legislative context, the background of the applicants, a brief description of the proposed development, the need for the proposed development along with the proposed benefits envisaged from the proposal.
The structure of the EIAR is set out and the persons responsible for the preparation of the EIAR are identified. It is stated that no difficulties were encountered in the preparation of the EIAR.

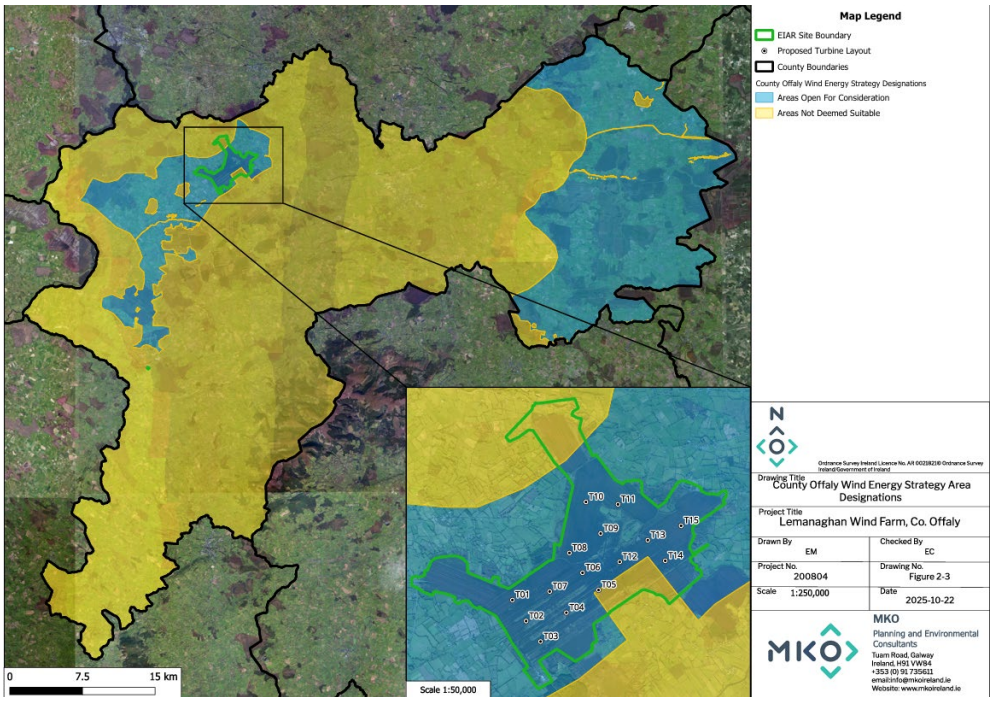
Chapter 2: Background to the Proposed Project

Chapter 2 outlines the need for the proposed project, a summary of the pre application and community consultations and an overview of International/European; national; regional; and local policies, as relevant to the proposed development.
In relation to the need for the proposed project, Section 2.1.3 of the EIAR refers to targets from Ireland's Climate Action Plan 2025 for renewable energy, including 9GW of onshore wind capacity by 2030 with at least 6GW to be delivered by 2025 and an 80% share of renewable electricity by the same year. It is stated that failure to meet binding EU targets will expose Ireland to financial penalties, increased carbon credit costs, and continued dependence on fossil fuel imports—posing serious risks to energy security and economic stability.
Section 2.2.2 denotes that the Climate Action and Low Carbon Development Act 2015 (as amended) ('the Climate Act') provides for a national climate objective, which commits to pursue and achieve no later than 2050, the transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy.
Reference is made in Section 2.3.1 to the Renewable Energy Directive III (RED III) which;

- increases the EU wide renewable energy target from 32% set under the previous revision of the directive to 42.5%, with an ambition to reach 45% by 2030;
- considers renewable energy development to be in the overriding public interest when addressing competing interests under the Habitats Directive (92/43/EEC), Birds Directive (2009/147/EEC) and the Water Framework Directive (2000/60/EC).

Section 2.6.2 outlines the provisions contained in the NPF (First Revision) in relation to promoting renewable energy use and generation at appropriate locations (NPO 70), reference to the opportunities to collocate renewable technology on post industrial peatlands and the target set for the Eastern and Midlands Region to install an additional 1,966 MW of onshore wind energy by 2030.
Section 2.6.4.1 outlines relevant policies and objectives from the OCDP which are referenced in Section 4 above of this report, along with the provisions of the County Wind Energy Strategy (CWES).
It is noted that it is stated in this section of the EIAR in relation to the CWES that; *"the Proposed Wind Farm turbines are located within an area designated as 'Areas Deemed Open for Consideration' for*

Wind Energy Developments, with the exception of T05 which is located on the boundary of an area designated 'not Deemed Suitable for Wind Energy Developments'".



This chapter also details a number of departmental policies and guidelines, such as the Wind Energy Development Guidelines 2006 and the Draft Wind Energy Development Guidelines 2019, along with industry advice documents.
Section 2.8 details the scoping and pre application consultations with Offaly County Council and An Coimisiún Pleanála which the applicants carried out in the preparation of this application and EIAR.
Section 2.10 outlines the methodology and projects considered in the cumulative impact assessment of each chapter of the EIAR.

Comments:

1. It is noted that this Chapter omits Table 3.1 from Chapter 3 of the Offaly County Development Plan which outlines the targets for wind energy, solar energy and battery storage demonstrating County Offaly's contribution to realising overall national targets.

Table 3.1 Renewable Energy Targets for County Development Plan period

Wind Energy Target by end of Plan Period: 466.3 MW
Solar Energy Target by end of Plan Period: 145 MW
Battery Storage Target by end of Plan Period: 445 MW

It should be noted also by the Coimisiún that as of May 2026, Offaly hosts approximately 520MW of wind energy capacity, with a further c.60MW permitted and a further approx. 200MW submitted for planning*. (*Within the WDA's). This installed capacity puts the county in 3rd place nationally, behind Kerry (795MW) and Cork (701MW) (Source: Irish Wind Energy Association 'County Colours' dashboard). It is important to note that this wind energy generating capacity sits alongside an extensive array of other energy developments in Offaly, for example: battery storage (c.800 MW installed, permitted or in planning), Solar (c.790MW permitted), Gas Generation (600MW permitted), Biomass Thermal Generation (c.120MW operational) and approx. 480MW of 'peaking' diesel-fired generation capacity, in addition to a number of other grid service development eg

Synchronous Compensators (permitted), a pilot Hydrogen plant (under construction), a methanisation plant (permitted) and a CO2 long duration energy storage facility (permitted).

2. The Planning Authority seeks to bring the Coimisiúns attention to the following relevant provisions of the CDP;
    - *Objective CAEO-04 of the Offaly County Development Plan which states that; "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.*
    - *Section 3.2.6 of the Offaly County Development Plan 2021-2027 which states; "Site suitability is an important factor in determining the suitability of wind farms having regard to possible adverse impacts associated with, for example, residential amenities, landscape, including views or prospects, wildlife, habitats, designated sites, protected structures or bird migration paths and compatibility with adjoining land uses. The Council is therefore required to achieve a reasonable balance between responding to overall positive Government policy on renewable energy and enabling the wind energy resources of the Planning Authority's area to be harnessed in a manner that is consistent with proper planning and sustainable development".*
    - the following paragraph of Table 3 of the Offaly County Wind Energy Strategy which immediately precedes Map 10 – Wind Energy Strategy Designations in the WES, which states that:
      "Wind energy developments in areas considered 'Open for Consideration for Wind Energy Development' following the below analysis does not imply 'automatic approval' as each proposal for development will be considered on their individual merits at planning application stage subject to the normal environmental and appropriate assessment, and compliance with the relevant policies and Offaly County Development Plan 2021-2027 County Wind Energy Strategy objectives, development management standards as set out in the Volume 1 of this County Development Plan and section 28 Ministerial Guidelines".

The Planning Authority emphasises the importance of a detailed project level assessment, which balances renewable energy delivery with broader social and environmental sustainability objectives and that a sites inclusion within areas considered 'Open for Consideration for Wind Energy Development' does not imply 'automatic approval' for planning applications. As previously referenced, this is supported by an objective of the CDP which states that it *is an objective of the Council to achieve a* ***reasonable balance*** *between responding to government policy on renewable energy and in enabling the wind energy resources of the county to be harnessed in an environmentally sustainable manner (objective CAEO-03).*

Chapter 3: Site Selection and Reasonable Alternatives

This chapter contains a description of the reasonable alternatives that were studied by the developer, and its specific characteristics, in terms of site location and other renewable energy technologies as well as site layout incorporating size and scale of the proposed development, connection to the national grid and transport route options to the site. This section also outlines the design considerations in relation to the Proposed Wind Farm and the Proposed Grid Connection and different stages of the design iterations for the proposed development.

It provides an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.

It is noted that Section 3.2.3.3.1 details that Lemanaghan Bog was selected for more detailed assessment on account that;

- the proposed turbines are located within an area designated as 'Areas Deemed Open for Consideration for Wind Energy Developments' in the Offaly County Council Wind Energy Strategy with the exception of T05 which is located on the boundary of an area designated 'Not Deemed Suitable for Wind Energy Developments;
- Low population density of receiving environment;
- Peat depths suitable for development;
- Proximity to National Grid;
- Subject site is not located within a European Designated site.

Section 3.2.4 outlines consideration of other alternative technologies. It is stated in this regard that;
"The capacity factor for solar in this region is 14.6% (0.146). In order to achieve a c. 90MW output using solar PV arrays, there would be a requirement of approximately 144ha, which represents approximately 11% of the site… Based on the above, the Proposed Wind Farm was progressed, as to achieve the same electricity output from solar energy as is expected from Proposed Wind Farm (c. 90MW), a larger development footprint would be required".

In relation to alternative turbine numbers and model, it is stated in Section 3.2.5.1 that*; "The proposed wind turbines will have a potential power output in the 4-to-7-megawatt (MW) range. It is proposed to install 15 no. turbines at the Proposed Project site which will have an estimated installed capacity of 90MW. Such a wind farm could also be achieved on the site by using smaller turbines (for example 2.5MW machines). However, this would necessitate the installation of approximately 36 turbines to achieve a similar output. Furthermore, the use of smaller turbines would not make as efficient use of the wind resource available at higher elevations above ground level, having regard to the nature of the site. A larger number of smaller turbines would result in the wind farm occupying a greater footprint within the site, with a larger amount of supporting infrastructure being required (i.e., roads, steel, etc.) and increasing the potential for negative environmental impacts to occur on biodiversity, hydrology and traffic and transportation".*
Section 3.2.5.2.2 outlines how the proposed 15-turbine final layout has been refined following feedback from the project team, the local community, and the need to ensure sufficient separation distances are maintained for on-site constraints.
It is noted also that consideration is given in this chapter to the 'Do-Nothing' Alternative.

Comment:

1. There appears to be little consideration of the extensive cultural heritage of Lemanaghan Monastic Complex given in the site selection, alternative layout, location of or number of turbines proposed. Reference is only made in this chapter to impacts on unrecorded, subsurface archaeology rather than consideration of the monastic complex. It should be noted that Lemanaghan is listed in Section 10.10.4 of the Offaly County Development Plan as a Monastic Site and under Policy BHP-43 of the Development Plan, it is Council to support and promote the protection and appropriate management of all monastic sites in the county. The Planning Authority submits that due consideration is required to be afforded to the scale, proximity and cumulative visual presence of the proposed turbines on the historical landscape of Lemanaghan and to the manner in which the proposed turbines would affect the setting, perception and experiential appreciation of key heritage assets. This is particularly relevant in relation to the Lemanaghan Monastic Site, where proposed turbines are located at distances considered unacceptably close from an archaeological and conservation standpoint, resulting in sustained and overbearing visual impacts that diminish the openness, archaeological legibility and landmark qualities of this nationally significant monastic landscape. It is requested that due consideration be afforded by ACP to the matters raised and to the wider historic context of this site, including the significant number of recorded monument (SMRs) toghers and likely routeways between the complex and other sites, particularly to the northeast of the site.

2. There is no consideration given to important local views and vistas across Lemanaghan Bog towards Bellair Hill from the Lemanaghan Monastic Complex in relation to the layout of and number of turbines proposed.
3. Consideration is only given to projects with the potential to generate 90 MW of renewable energy on this particular application in relation to the size and design of the overall development. The focus on alternatives is based solely on the delivery of a 90MW wind farm, without any consideration afforded to alternative scaled development(s) within other less sensitive, more suitable sites as listed in Section 3.2.3.3 of the EIAR.

Chapter 4: Description of the Proposed Development

This section provides an overview of the proposed development as outlined in Chapter 4: Description of the Proposed Development of the Environmental Impact Assessment.
From Section 4.4.1.1.3, it is noted the proposed wind turbines have the following dimensions:

- Turbine Tip Height – 220 metres
- Hub Height – 145 metres; and
- Blade Rotor Diameter – 150 metres.

It is stated that the turbines would be light grey in colour.

Figure 4-4 below from this section of the EIAR shows the elevational drawings of the proposed wind turbines.

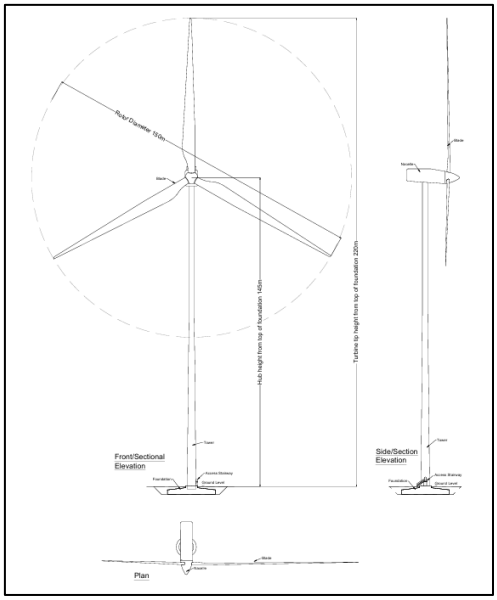


Figure 2: Elevations and dimensions of proposed turbines (source: as submitted)

The proposed SID's overall power output is projected to be 90 MW, based on each of the 15 turbines generating 6 MW of output respectively (Section 4.4.1.1.4, EIAR).

It is referenced that hardstanding areas (approximately 48m x 75m) consisting of levelled and compacted hardcore, are required around each turbine base to facilitate access, turbine assembly and turbine erection (Section 4.4.1.1.4, EIAR). The maximum horizontal and vertical extent of the turbine foundations will be 28 metres and 4 metres respectively, comprising reinforced steel, poured concrete and granular fill to the finished surface level (Section 4.4.1.1.5, EIAR).

Figure 4-2 below, as extrapolated from EIAR shows the layout of the proposed development.

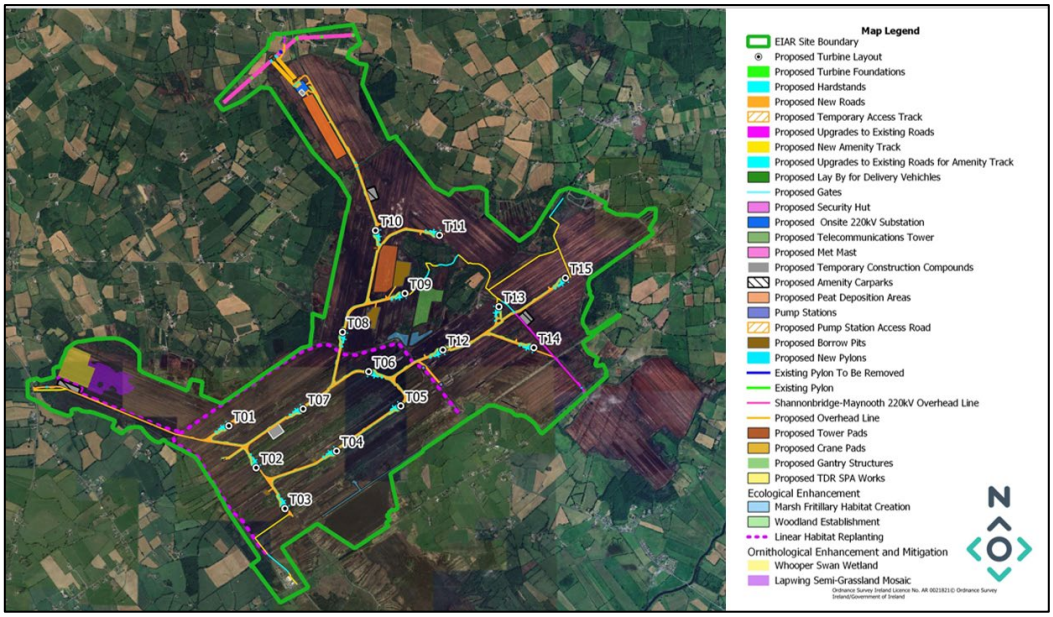


Figure 3: Overall layout of proposed development (Source Figure 4-2 of EIAR)

It is noted from the applicants documentation that the proposed grid connection will connect to the national electricity grid via a proposed 220kV substation which will be sited in the northern part of the site. The Proposed Grid Connection will consist of approximately 0.8km of overhead line (comprising 0.4km of OHL from the proposed steel masts for the double loop-in/loop-out from the proposed onsite 220kV substation to the existing OHL), 4 no. new steel masts, and the removal of 1(no) existing steel mast. The proposed new 4(no) lattice masts will be located within the site.

Each turbine will be connected to the proposed onsite 220kV electricity substation via underground 20kV or 33kV (kilovolt) electricity cabling. The proposed onsite 220kV substation is located in the northern section of the site, in the townland of Cooldorragh, with close proximity to the existing Shannonbridge-Maynooth 220kV OHL located approximately 0.4km north of the proposed onsite 220kV substation, at its closest point.

The elevations of proposed substation building are shown below (Figure 4.21 & Figure 4.22, EIAR).

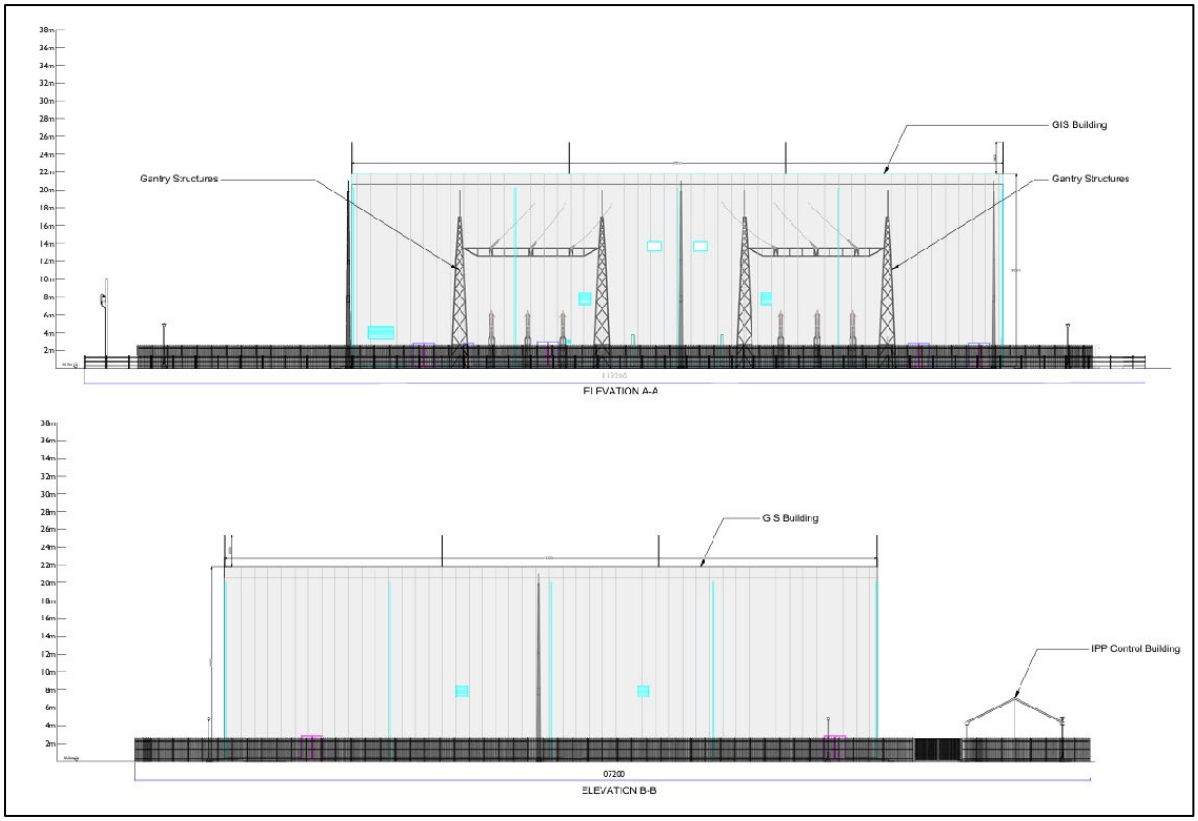


Figure 4: Proposed substation elevations

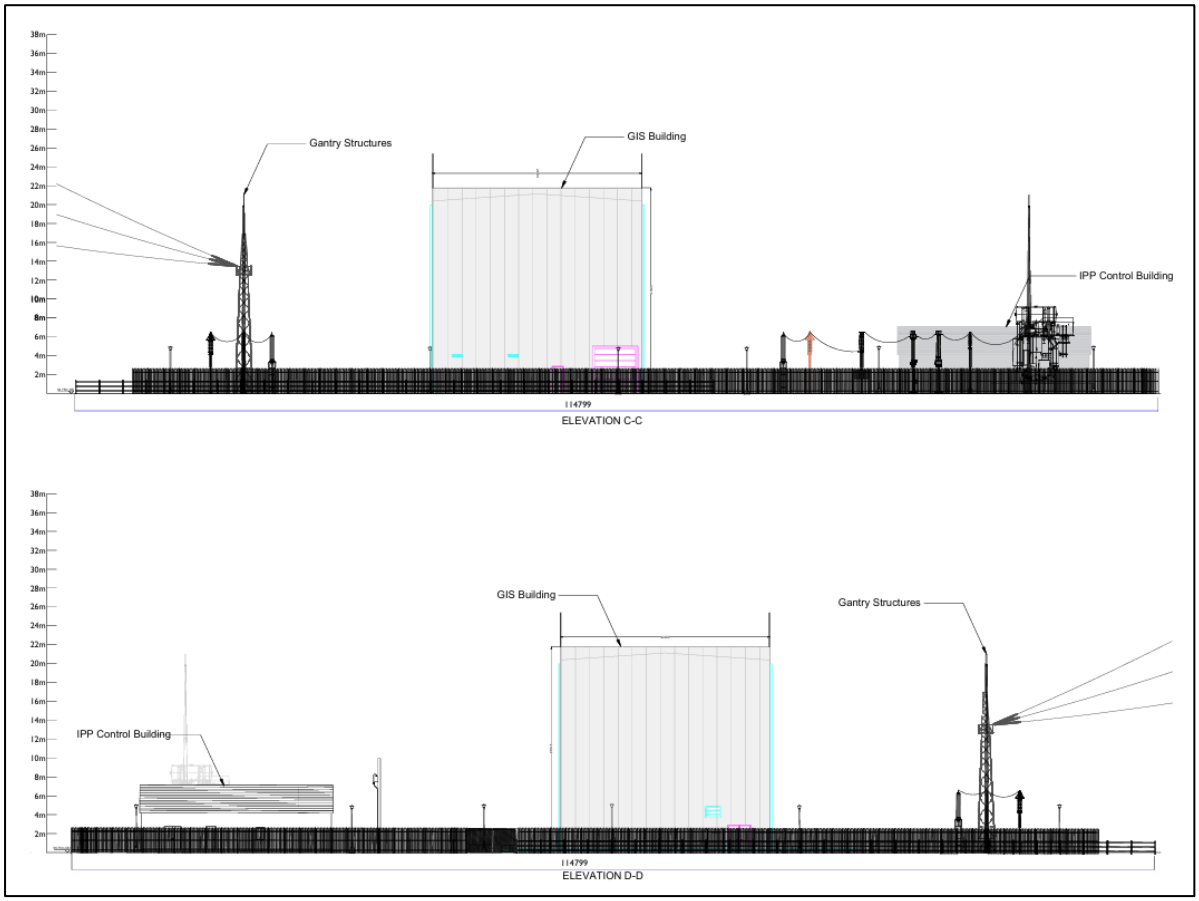


Figure 5: Proposed substation elevations

The elevations of the proposed new pylon tower are shown in Figure 4-29, EIAR, as below.

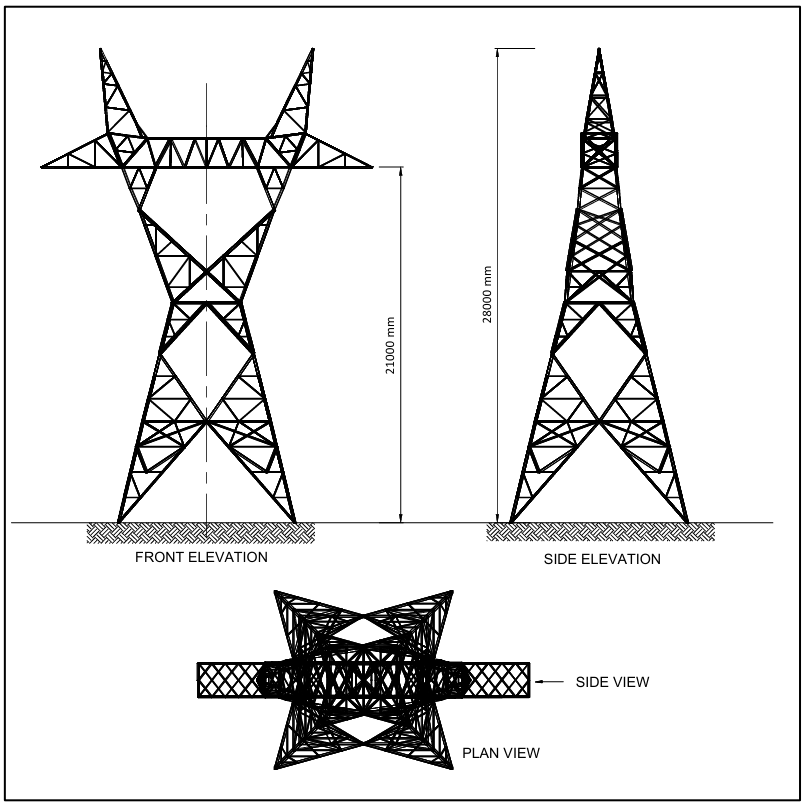


Figure 6: Proposed 220 kV Overhead line tower

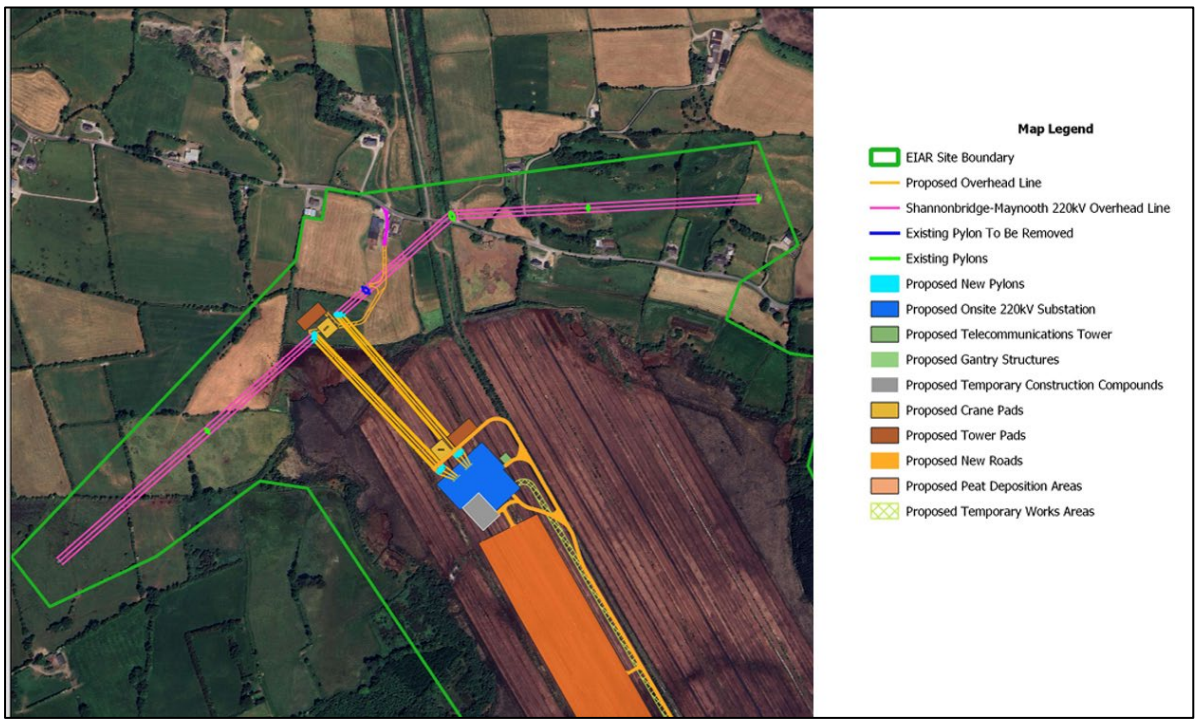


Figure 7: Proposed grid connection route

The applicant outlines that no commercial forestry felling will occur. However, the removal of a total of 1.02 hectares of immature woodland will be required within and around the development footprint

to allow for the construction of the site entrances, access roads, underground cabling, and other ancillary infrastructure.

It is noted from Table 4.3 in Section 4.4.3.1 of the EIAR that the total approximate quantity of peat and non-peat material (spoil) requiring management from the proposed development is projected to be 438,449 m^3. The applicant proposes to manage any excess overburden generated through construction into 2(no.) peat deposition areas, linear berms along access roads and landscaping.

It is noted from Section 4.4.3.3 of the EIAR that it is intended to;

- obtain significant volumes of crushed stone that will be required for the construction of the proposed project from 4 no. proposed onsite borrow pits. Access to all 4 no. proposed borrow pits will be via internal access roads. Once the proposed borrow pits have been established, machinery and vehicle access to and from the proposed borrow pits during the construction phase (i.e., use and reinstatement) will be via internal roads only.
- infill the proposed borrow pits with excavated peat after all required material for construction has been excavated.
- reinstate the proposed burrow pits either by reseeding or leaving to revegetate naturally.

The applicant state that the anticipated maximum volume to be extracted from the proposed borrow pits for the construction of the Proposed Project is 15,587m^3 of peat and 159,522m^3 of spoil. It is anticipated by the applicants that engineering fill and higher quality, surfacing granular fill and sand will be sourced from local, authorised quarries.

It is stated in Section 4.7.1 that as part of the proposed development, it is proposed to upgrade 3(no.) existing entrances and facilitate 2(no.) new site entrances for the construction, operation and decommissioning phases of the proposed development. In relation to the new entrances, 1(no.) new entrance is to be located on the northern side of the L-7002 local road, while an existing agricultural entrance off the L-7001 local road network will also be upgraded to facilitate construction phase access to the proposed grid connection infrastructure located under the Shannonbridge-Maynooth 220 kV overhead line.

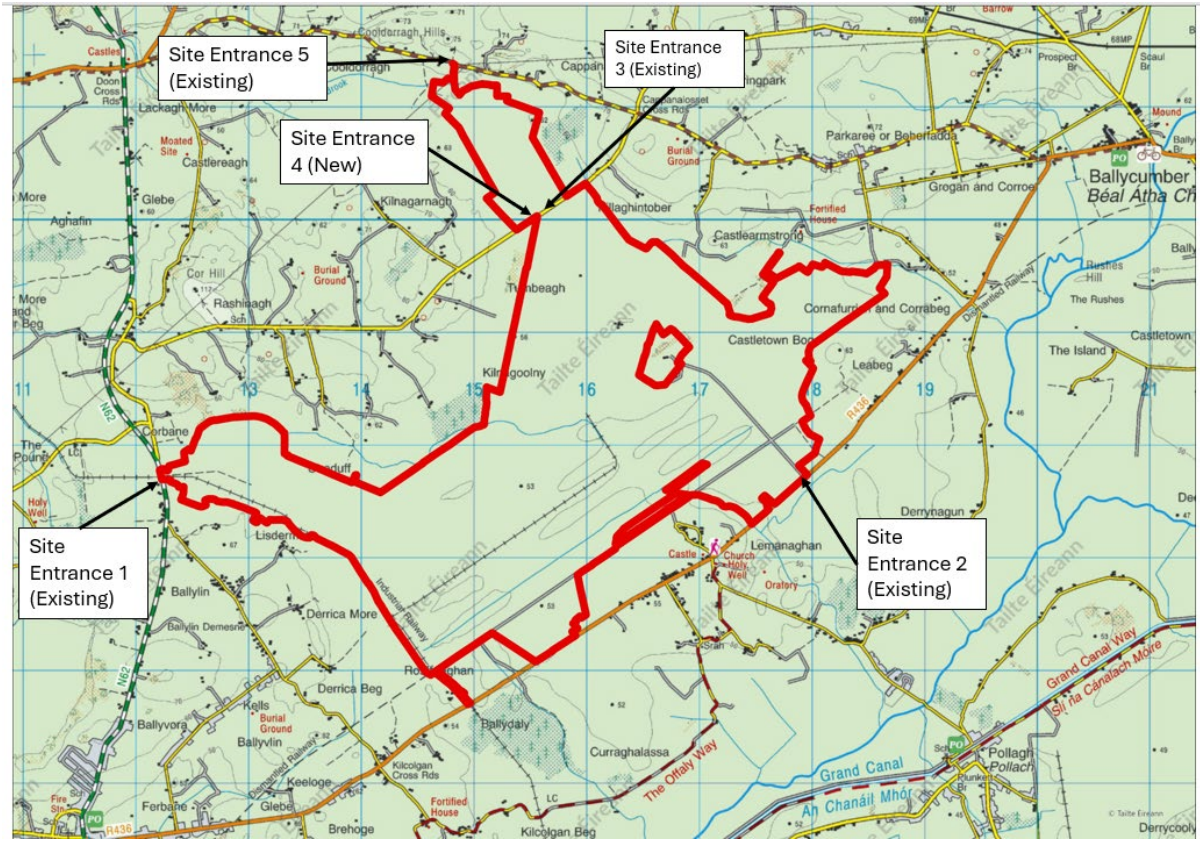


Figure 8: Proposed and existing entrances to site (Source: OCC map)

It is stated in Section 4.7.3 that turbine components are to be delivered to the site via Galway Port through Galway City via the Lough Atalia Road, the R339 Wellpark Road, northwest onto the R336 Tuam Road, before turning west onto the N6 National Road for approximately 3.7km where the N6 joins the M6. The transport vehicles will merge onto the M6 and head east towards to the Proposed Wind Farm site. It is proposed that the large wind turbine plant will be delivered via the M6 before turning south onto the N52 at Junction 5 (Tullamore/Kilbeggan). The route follows the N52 south, bypassing Tullamore to the east and passing through the settlements of Blue Ball, Kilcormac and Five Alley. Deliveries will turn right onto the N62 (at the junction known as Kennedys Cross) and will proceed northwards towards Ferbane for approximately 22km to Site Entrance 1.

Section 4.7.4 outlines the required road and junction widening works in relation to turbine delivery at 18 locations and are limited to temporary measures including temporary local road widening, overruns of roundabouts, temporary relocation of some signs and street furniture, and a temporary bypass road will be required at Kennedys Cross junction.

Section 4.10 states that it is estimated that the construction phase will take approximately 24 to 30 months from the commencement of works to the commissioning of the wind farm with the construction works broken down into three overlapping phases;

1) civil engineering works: 18 months,
2) electrical works: 18 months, and
3) turbine erection and commissioning: 9 months (Section 4.10.2, EIAR).

It is noted that a Construction and Environmental Management Plan (CEMP) has been prepared and is included in Appendix 4-4 of the EIAR. The applicant proposes to locate a wheelwash facility at each of the construction and delivery entrances to the site and a road sweeper to be made available by the contractor for public roads in the event of dirt or debris arising by trucks associated with the project.

It is stated in Section 4.6.1 of the EIAR that Bord Na Mona (BnM) have produced a Draft Rehabilitation Plan for Lemanaghan Bog, and it is the intention of BnM to rehabilitate the bog in a phased approach under EPA IPC Licence P0500-01. A high level overview of the actions proposed is provided in Table 4.7 of the EIAR, which is shown below in Figure 9.

Type	Code	Description	Area (Ha)
Deep peat cutover bog	DPT1	Regular drain blocking (3/100 m) + modifying outfalls and managing water levels with overflow pipes	365
Dry cutaway	DCT1	Modifying outfalls and managing water levels with overflow pipes	252
Wetland cutaway	WLT1	Modifying outfalls and managing water levels with overflow pipes	104
Marginal land	MLT1	No work required	102
Constrained area	Constraint	Constraint – windfarm infrastructure & active turbary	291
Total Area			**1,114**

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

Figure 9: Types of and areas for rehabilitation measures on subject site (as per Table 4-7 of EIAR)

In relation to decommissioning, it is stated in Section 4.13 that the wind turbines proposed are expected to have a lifespan of approximately 35 years. Following the end of their useful life, the equipment may be replaced with a new technology, subject to planning permission being obtained, or the Proposed Wind Farm may be decommissioned fully. The proposed Grid Connection will however remain in place as it will be under the ownership and control of the ESB Networks and/or EirGrid and will form a permanent part of the national electricity grid.
A decommissioning plan has been prepared and is attached as an appendix to the EIAR.

Comments:

1. The Planning Authority express strong concerns in relation to;

(i) the layout of the proposed development where internal roads and site access arrangements are to be located to the western 'spur' of the site adjacent to the N62. A very significant number of recorded monuments, comprising a Class 1 Togher, Class 2 Toghers and Class 3 Toghers are sited within this area. The historical significance of this area of the site has not been duly examined and the layout as proposed is considered to pose a significant negative impact on the archaeological and heritage significance of this area of the site, if permitted.

(ii) the presence of turbines 5, 11, 12, 13, 14 and 15 as shown on Drawing No. Figure 4-1 is located in such close proximity to lands of significant archaeological and heritage value.

2. It is noted that the Draft Peatlands Climate Action Scheme (PCAS) measures are not shown in the Draft Cutaway Bog Decommissioning and Rehabilitation Plan 2024 contained in Appendix 2-4 accompanying the EIAR. It is considered that this chapter and indeed the Draft Cutaway Bog Decommissioning and Rehabilitation Plan 2024 would greatly benefit from

	incorporating the Draft Peatlands Climate Action Scheme (PCAS) measures within the context of the proposed site layout.

Chapter 5: Population and Health

The chapter begins by outlining the baseline population in Section 5.3. It is noted in this regard that;

- The population study area has a population of 3,286 persons and comprises a total land area of 99.8 km²;
- The population of the study area increased by 4.8% between 2016 and 2022;
- The population density of the study area recorded during the 2022 Figure 4-2 was approximately 33 persons per km² which is lower than the national population densities of 73.27 persons per km²; and
- In relation to principal economic status, the percentage of the local population 15+ at work is below the corresponding figure for Offaly and the state;
- The primary land use in the study area comprises a mix of agriculture, peat cutting and low density residential with 202 farms located within the area and 2(no.) stud farms located within 10 km of the site;
- There are 21(no.) sensitive receptors located within 1 km of the proposed turbines, the closest residential receptor is located approximately 896 metres from the nearest proposed turbine. There are no properties located within 100 metres of the proposed grid connection;
- The nearest school to the subject site is St Caitlins National School, Rashina, located approximately 2.2 km north of the nearest turbine.
- Tourist attractions in the area; the Midlands Trail Network, Banagher line, the Offaly Way, the Grand Canal, Lemanaghan Monastic site, Lough Boora Discovery Park and Clara Bog Nature Reserve;
- A number of studies and reports are referred to in relation to a general positive tourist attitude to windfarms and public perceptions of wind energy. It is noted however that there is no reference made in this regard to local attitudes and perceptions to wind energy development in the study area, particularly any issues raised from public meetings or in the local media.

The chapter proceeds to outline the baseline health environment (Section 5.4). It is noted in this regard that it is stated that the vast majority of the population within the population study area marked their general health as being 'very good'.

It is noted that Section 5.4.2 refers to selected international studies and working papers on the health effects of wind farms.

Section 5.5.1 similarly refers to selected studies and working papers on property values and wind farms.

Section 5.7.1 states in relation to predicted shadow flicker results that;

- 29 sensitive receptors are theoretically predicted to experience zero shadow flicker;
- 128 sensitive receptors are theoretically predicted to experience some shadow flicker;
  - Of the 128 sensitive receptors, 58 sensitive receptors are theoretically predicted to experience shadow flicker that exceeds the DoEHLG 2006 Guidelines thresholds for daily shadow flicker
  - No sensitive receptors are theoretically predicted to experience shadow flicker that exceeds the DoEHLG 2006 Guidelines thresholds for annual shadow flicker.

Section 5.8.3.2.8 details the mitigation measures that are to be employed at the potentially affected properties. It is noted that it is stated that where daily shadow flicker exceedances have been predicted at buildings by the modelling software, a site visit will be undertaken firstly to determine the level of occurrence, existing screening and window orientation. This will determine if the receptor has an actual line of sight to any turbine and actual potential for shadow flicker to occur. Once this exercise is

completed and all the potentially affected properties identified, the relevant turbine(s) may potentially be programmed to switch off for the time required to reduce daily shadow flicker to below the guideline limit of 30 minutes. Table 5-10 list the days per year and the turbines that could be programmed to switch off at specific times, in order to reduce daily shadow flicker to a maximum of 28 minutes, which is below the DoEHLG 2006 Guidelines limit of 30 minutes.
Section 5.8 evaluates the impacts of the construction, operational and decommissioning stages of the proposed development in relation to population levels, employment and investment, land use patterns and activities, property values, tourism, residential amenity, health and safety, air quality, dust and exhaust emissions, climate, water quality, noise and vibration, traffic and transport, Major Accidents and Natural Disasters, shadow flicker and interference with telecommunication systems and EMF.

Comment:

1. Whilst the Table 5-11 is useful in summarising the effects of the proposed development on specific topics/areas from the construction phase, operational phase and decommissioning phase, the overall chapter would have benefitted from a more coherent structure based on the headings set out within this table.
2.

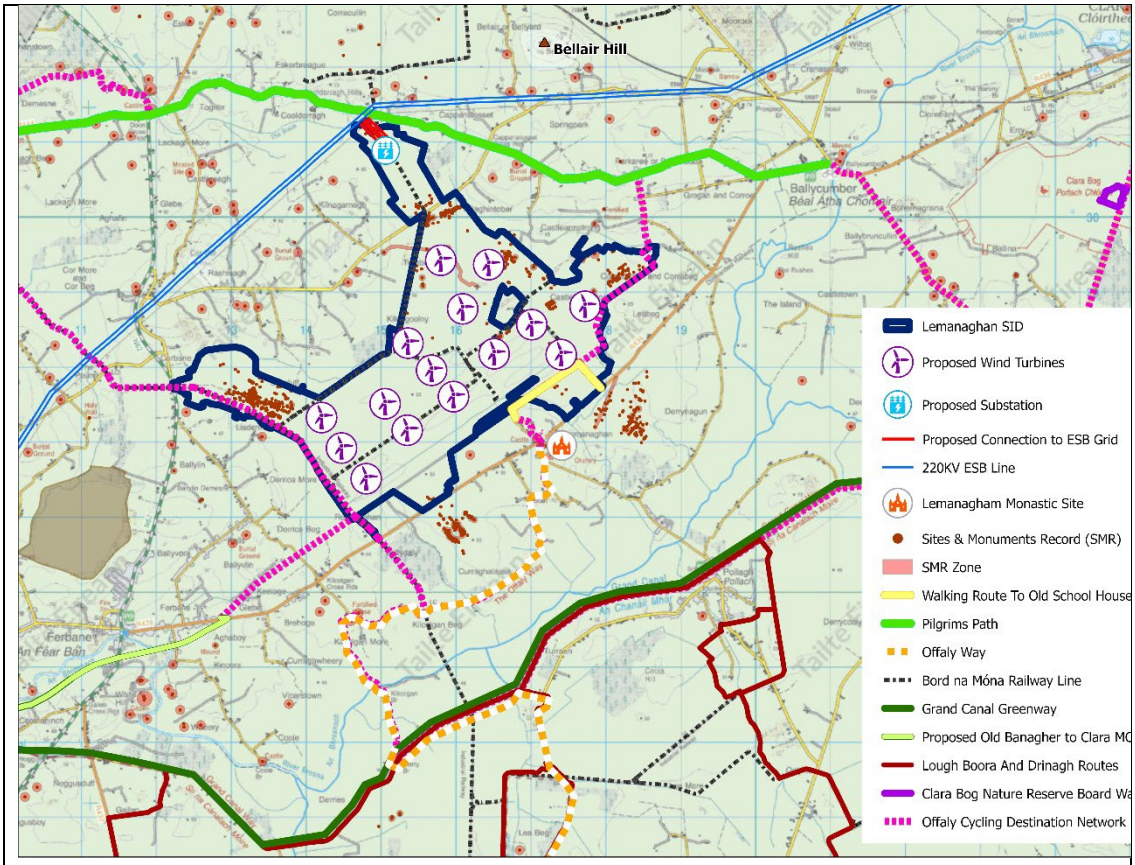
(a) There are numerous references and assessments of the effects of the proposed development in Section 5.3, Baseline Population, and Section 5.4 , Baseline Health. This approach does not adhere to Annex IV(3) of the EIA Directive which requires in relation to the baseline section of an EIA; 'A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the project as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.'

(b) The Planning Authority is concerned that the baseline section of this chapter is weighted towards the potential positive aspects of the proposed development rather than simply showing what exists in the study area before any development occurs. Section 5.3 does not include;

   (i) evidence of the typical specific economic and employment benefits felt locally in areas which have accommodated renewable energy developments to date rather than only referring to such benefits at a macro and national level.

   (ii) details in relation to local attitudes and perceptions to wind energy development in the study area, particularly any issues raised from public meetings or in the local media rather than relying solely on studies and reports at a macro and national level.

3. It is noted that Section 5.3.9.2 omits the Pilgrims Path from Ballycumber to Clonmacnoise. The Planning Authority considers that the proposed development would benefit from a map showing the location of the subject site relative to local tourist attractions. Please find below map, which is requested to be considered by ACP in its assessment of this proposed SID. Please note that the Midland Cycling Destination – Offaly Routes are proposed and not yet constructed.



4. In relation to the impact of renewable energy developments on tourism, it is noted that surveys referred to are dated, from 2007 and 2012, in the context of the development of a greater number of and larger sized wind farms in certain parts of the country in recent years. In addition, other reports and surveys do not detail if the tourist destination(s) were heritage sites, which is an important consideration having regard to the typical expectations of visitors to such sites; a strong sense of authenticity, clear and engaging interpretation, and protection of the site's overall character.

5. The Planning Authority queries a number of the conclusions contained within Section 5.8.2 and 5.8.3 in relation to the significance of the impacts of the construction and operational phase of the proposed development on the local population. In particular, based on evidence presented, the PA queries the effects of the proposed development on the following:

<u>Construction Stage</u>

(i) Impacts on heritage tourism product in the area (i.e. negative impact on the historical and cultural values within this existing tranquil environment)

(ii) Impacts on traffic and transport.

<u>Operational Stage</u>

(i) Impact on heritage tourism product in the area (i.e. negative impact on the historical and cultural values within this existing tranquil environment)

(ii) Siting and Operation of the turbines on property values of dwellings in close proximity to the site (i.e. negative impact on residential

amenities due to visual overbearance given the scale and siting of turbines from dwellings sited in close proximity to the site, within a low-lying, flat landscape).

All of the above are considered by the PA to be 'Moderate to High' in significance.

Chapter 6: Biodiversity

This chapter assesses the likely significant effects (both alone and cumulatively with other projects) that the proposed development may have on Biodiversity, Flora and Fauna, and sets out the mitigation measures proposed to avoid, reduce or offset any potential significant effects that are identified. It is noted that the chapter examines species and habitats of ecological importance, as well as any role they may play in providing a supporting network for European Sites and their Qualifying Interests (QIs) and Special Conservation Interests (SCIs).

It is noted from Table 6.2.3 that field surveys were undertaken between 2021 and 2025 and included multidisciplinary walkover surveys, habitat mapping, and dedicated surveys for protected species including bats, otter, badger and marsh fritillary.

Table 6.10 shows that the proposed development will result predominantly in the loss of bare cutover bog habitat, which has been heavily modified through historical industrial peat extraction and drainage. Approximately 60.8 ha of habitat will be lost, the majority of which (approximately 50.6 ha) comprises bare cutover bog which is deemed to be of low ecological value in the submitted application.

A Biodiversity Management and Enhancement Plan (BMEP) is proposed as part of the Proposed Project in Appendix 6-5. The plan includes measures to enhance biodiversity within the site through the planting of approximately 7.8 ha of native woodland, the establishment of approximately 6.5 km of native hedgerow and management measures to enhance suitable marsh fritillary habitat in an area of 6.7ha within the site.

In relation to fauna and aquatic species, it is noted that;

- Table 6.16 states that no bat roosts were identified within the subject site. A small soprano pipistrelle bat roost was recorded in an existing structure located more than 340m from the nearest proposed turbine (T13). The roost will be retained and avoided as part of the Proposed Project.
- Table 6.14 states that no otter holts or resting sites were identified within the Proposed Project site.
- Table 6.15 states that one badger sett was recorded within the Proposed Project site, located over 300 m from any proposed infrastructure. The Proposed Project has been designed to avoid this sett.
- Table 6.17 refers to evidence of marsh fritillary recorded within the Proposed Project site in the form of one inactive larval web. The Proposed Project has been designed to avoid areas of suitable marsh fritillary habitat, and no marsh fritillary habitat will be lost as part of the Proposed Project

It is noted in relation to Designated sites that Section 6.4.5 states that *"None of the elements of the Proposed Project are located within the boundaries of any Nationally or European designated sites important for nature conservation (Figure 6-2 and Figure 6-3). There will be no direct effects on any designated site as a result of the construction, operation and decommissioning of the Proposed Wind Farm or the Proposed Grid Connection."*

It is stated also that while the River Shannon Callows pNHA was identified as being within the Likely Zone of Influence of the proposed development due to hydrological connectivity, having regard to the implementation of best practice mitigation measures as outlined in Chapter 9 Hydrology and Hydrogeology and the CEMP submitted, there is no potential for indirect effects on River Shannon Callows pNHA due to deterioration of water quality.

Following an assessment in Section 6.5.2 of relevant projects in combination with the proposed development, other wind energy developments in the wider area and planning applicants in the vicinity of the site, the EIAR outlines that no significant cumulative effects on biodiversity have been identified.

Comments:
So as to avoid repetition, please refer to comments made in respect of Chapter 7 below, which is also relevant to Chapter 6.

Chapter 7: Birds

Section 7.2.4 outlines the field surveys which were undertaken during the survey period, October 2020 to March 2025, consisting of four breeding seasons (April – September) and five non-breeding seasons (October – March).

The following Key Ornithological Receptors (KORs) were identified in Table 7-10 as being present within the potential zone of influence : golden plover, whooper swan, crane, hen harrier, kingfisher, merlin, peregrine, barn owl, kestrel, lapwing, snipe, woodcock, buzzard, and sparrowhawk.

It is noted from Section 7.5 that it is considered by the applicant that the potential effects of the proposed development at construction, operation and decommissioning stages upon birds will not be significant. Effects associated with habitat loss, disturbance displacement, barrier effect, collision risk and cumulative effects were assessed to be no greater than long-term slight negative effect (EPA, 2017) and low effect significance (Percival, 2003). The only exceptions are kingfisher, wintering whooper swan and breeding lapwing for which moderate habitat loss effects were predicted in the absence of mitigation.

Section 7.7 provides an overview on Ornithological Mitigation and Enhancement Measures to offset the potential impacts identified to whooper swan and lapwing along with best practice measures proposed for the benefit of local biodiversity.

Measures proposed include;

- An enhancement area of 10 hectares for whooper swan to the northwest of the proposed wind farm, in order to replace the roosting habitat lost to the footprint of the Proposed Wind Farm.
- Provision of a controlled flooding area so whopper swans can access water during the winter months
- Planting of freshwater plants around the perimeter of the wetland area.
- An enhancement area of 10 hectares for lapwing to the northwest of the proposed wind farm to breed, having regard to the estimated two pairs breeding present in the most recent breeding seasons surveyed.
- The reprofiling and infilling of drains and the provision of gentle slopes along with predator-proof fencing along the perimeter of the site.
- Ten number nest boxes for barn owls, (subject to agreement on location by an Ecological Clerk of Works and/or Project Ecologist and the location to be registered with BirdWatch Ireland.

Section 7.8 outlines a summary of proposed monitoring at commencement, construction and post construction stages. It is noted that it is proposed that construction works will commence outside the bird nesting season (1st of March to 31st of August inclusive) and pre-commencement surveys will be undertaken prior to the initiation of works at the site.

An assessment of potential cumulative effects was also undertaken in Section 7.10, taking into consideration other extant planning applications and existing and proposed wind farms within 25km.

It is noted that Section 7.11 states that; *"Following consideration of the residual effects (post-mitigation), it is concluded that the Proposed Project will not result in any significant effects on any of the identified KORs. No significant effects on receptors of International, National or County Importance were identified. Provided that the Proposed Project is constructed, operated and decommissioned in accordance with the design, best practice mitigation and enhancement measures that are described within this application, significant individual or cumulative effects on the identified KORs are not anticipated."*

Comments:

1. An Architectural, Biodiversity and Heritage Conservation report has been received from the Councils Heritage Section which provides comments, on a number of chapters including Chapter 7: Birds, which are included below.

2. The proposed windfarm development must be considered within the context of a highly sensitive and extensively modified bog and wetland landscape, where historic peat extraction has resulted in significant habitat loss, fragmentation, and degradation. In such a setting, even incremental additional pressures may give rise to disproportionately significant ecological effects. Accordingly, a precautionary, landscape-scale approach is essential.
3. Particular emphasis must be placed on the protection, restoration and long-term management of peatland habitats, ensuring that hydrological regimes, habitat integrity and ecological functionality are not only maintained but demonstrably enhanced over time. Given the critical role of hydrology in sustaining peat-forming systems, any disruption—direct or indirect—must be rigorously avoided or fully mitigated in line with best practice under the Environmental Liability Directive, Environmental Impact Assessment (EIA) Directive, and the European Communities (Birds and Natural Habitats) Regulations 2011–2021.
4. The development must also explicitly recognise the wider ecological network of the Midlands bog complex, including functional connectivity between cutaway bogs, raised bog remnants, wet grassland, callows, and associated river corridors within the broader Shannon catchment. Habitats of seemingly low intrinsic value may nonetheless function as essential steppingstones, commuting routes, or buffer zones for Annex I habitats and Annex II species, and therefore require careful consideration.
5. There is a particular need to protect and strengthen bat populations, including roost sites, commuting corridors and foraging areas. The fragmentation of linear landscape features such as hedgerows, drains and treelines, in conjunction with turbine placement, has the potential to create barrier effects and disrupt established bat movement patterns, contrary to the requirements of the Habitats Directive and associated national legislation.
6. Furthermore, the proposal must fully account for impacts on bird species, with specific regard to both resident and migratory populations. The site and surrounding landscape are known to support a range of sensitive species associated with peatland, wet grassland and upland habitats, including Hen Harrier (Circus cyaneus), Merlin (Falco columbarius), Curlew

(Numenius arquata), and Common Crane (Grus grus), alongside wintering and passage species such as Whooper Swan (Cygnus cygnus) and other migratory waterbirds.

7. Of particular concern are:

- Barrier effects arising from turbine arrays, which may alter established flight lines, displace birds from suitable foraging and breeding habitats, and increase energetic costs, particularly for migrating species;
- Collision risk, both alone and in-combination with existing and permitted wind energy developments, especially along known migratory routes and within functional ecological corridors;
- Disturbance and displacement effects, including the potential abandonment of roosting, nesting or foraging habitats;
- Loss or degradation of functionally important habitat, including winter roost sites for Hen Harrier and potential breeding or prospecting habitat for Common Crane

8. The repeated use of bog habitats in proximity to the site by Hen Harrier strongly indicates the presence of an established winter roost. Such sites are of high conservation importance and are particularly vulnerable to disturbance, lighting, noise, and operational activity. Their loss or degradation would represent a significant adverse effect on a strictly protected species and must be assessed in accordance with the precautionary principle.
9. In relation to Common Crane the assessment must move beyond a narrow interpretation based on current population size and instead incorporate known recolonisation trends, expansion potential, and the presence of non-breeding and prospecting individuals within the wider landscape. Any reliance on speculative future habitat enhancement measures, without secured delivery mechanisms, resourcing, monitoring, and adaptive management, should not be afforded weight in the assessment of likely significant effects.
10. The applicant must demonstrate full compliance with international best practice in avoiding, reducing and mitigating bird strike risk, including robust collision risk modelling that incorporates cumulative and in-combination scenarios, particularly in light of increasing wind energy development across the Midlands. This is particularly important given the evolving landscape context and the likelihood of increased pressure on migratory corridors.
11. In addition, a comprehensive, enforceable, and adequately resourced long-term monitoring and adaptive management programme must be provided, covering the full operational lifetime of development. This should include triggers for corrective action where unforeseen impacts arise, in line with best practice under IPC (Integrated Pollution Control) licensing conditions and EPA guidance where applicable.
12. Crucially, the assessment must robustly address in-combination and cumulative effects, taking into account existing, permitted, and proposed wind energy developments; ongoing peatland rehabilitation and restoration initiatives; agricultural intensification and land-use change; and historic habitat loss and fragmentation across the bog complex.
13. The current approach, which largely treats impacts in isolation and at a project-specific scale, fails to adequately capture the cumulative erosion of ecological resilience within the wider system. In a landscape where intact raised bogs have been reduced to small remnants, the incremental loss of marginal habitats, ecological corridors, and buffer zones may significantly undermine long-term restoration objectives.

14. Furthermore, the absence of a coordinated, strategic masterplan for the Bord Na Móna Offaly and adjoining bog and wetland complexes significantly constrains the ability to assess long-term cumulative ecological effects in a meaningful way. This lack of strategic clarity introduces a high degree of uncertainty into the assessment and limits confidence in conclusions regarding residual impacts.
15. Given this uncertainty, and in the context of emerging obligations under the EU Nature Restoration Law, any development not directly contributing to habitat restoration must be subject to the highest level of scrutiny. A precautionary approach is required, ensuring that the integrity, connectivity, and recovery potential of the wider bog and wetland landscape are not compromised.

Chapter 8: Land, Soils and Geology

Section 8.2 details the methods undertaken to characterise the land, soils and geology of the site using a combination of desk study and site investigation data. The site has been inspected though several walkover of the site as well as peat probing, gouge coring, shear vane testing, trial pit excavations, and laboratory analysis of recovered soil samples.

In relation to site topography, Section 8.3.1 found that the site is relatively flat, ranging from approximately 50 to 62mOD. Section 8.3.2 states with regard to land use that the site consists predominantly of cutover bog comprising of bare peat fields separated by field drains and as a result of industrial peat extraction activities and associated drainage works the land and topography has been significantly modified.

Section 8.3.3.2 states that;

- peat depths on site vary between 0 and >6m with an average peat depth of 2m. The peat thickness at the proposed turbine locations ranges from 0.1 to >4.5m.
- Available site data indicates that at least 80% of the 15 no. proposed turbine locations have a peat depth of ≤3m.
- Peat depths exceeding 3m were recorded at only 2 no. turbine locations: T15 and T1.
- The greatest peat depths were recorded in the north of the Proposed Project site, with deep peat encountered at the proposed onsite 220kV substation location (5-5.5m). Where possible, the deeper peat areas have been avoided by the Proposed Project layout.

In relation to bedrock geology, Section 8.3.4.1 states that the GSI do not map the presence of any karst features or any significant areas of bedrock outcrop within the subject site. In addition, Section 8.3.4.2 shows that no bedrock was encountered in any of the 63 no. trial pits completed on site.

It is noted that Table 8-10 in Section 8.4 estimated volumes of peat and spoil to be excavated are in the region of 438,449 m^3 (207,527 m^3 peat and 230,922 m^3 spoil).

In relation to the Likely Significant Effects and Associated Mitigation Measures outlined in Section 8.5, it is stated that, subject to best practice measures detailed in the Peat and Spoil Management Plan attached in Appendix 4-3 and mitigation measures outlined in the EIAR, no significant effects on peat and soils or underlying geology will occur during the construction, operation or decommissioning phases of the proposed development.
Section 8.5.7 states that there will be no significant negative cumulative effects on land, soil and geology as a result of the proposed development and that the draft Cutaway Bog Decommissioning and Rehabilitation Plan included in Appendix 2-4 will result in an overall positive effect on the local land, soils and geological environment.

The chapter concludes with a summary of all identified impacts for the Proposed Project relating to land soils and geology in Table 8-13 'EIA Classification Summary'.

Comments:

1. This chapter would have benefitted from a quantification of the carbon emissions associated with the peat extraction of 207,527 m^3 associated with the construction stage of the proposed development and mitigation measures proposed to reduce the impact of this aspect of the proposed development or how the carbon emissions are balanced by other aspects of the proposed development.
2. The applicant's choice of the use of the north-eastern area of the bog, which is essentially an extension to the main bog area, should be stringently questioned and examined in detail. It is acknowledged that this appears to be the easiest way of accessing the National Grid, however, the merits of a major internal road and very large substation infrastructure at this location is of concern in light of:
   (i) the deep peat remaining here – making it more suitable for effective rehabilitation,
   (ii) the habitat, potentially amenity and landscape (this area falls down from the roadway to the main bog) benefits arising from such rehabilitation,
   (iii) installing such infrastructure in a substantial piece of bog a distance away from the main development as opposed to in-conjunction / lesser cumulative impact and
   (iv) the historic landscape which exists generally between the Lemanaghan Monastic site and the area around Bellair Hill, Boher and Castle Armstrong.

Chapter 9: Water

Section 9.3 outlines in relation to the baseline/receiving environment that;

- the surface of the subject site is drained by a network of drains that are typically spaced every 15 to 20m
- larger arterial drains connect the smaller field drains and gently slope towards perimeter silt ponds and surface water outfalls.
- Surface water outflows from the site discharge to small streams and drains located in the lands surrounding the bog.
- Regionally, the subject site is located in total of 3 no. surface water catchments.
- All surface waters draining the site are directed to the River Shannon via the Boor and Brosna rivers and their associated tributaries.
- The bedrock geology underlying the subject site is classified as a Locally Important Aquifer. GSI vulnerability mapping classifies the bedrock aquifer underlying the vast majority of the subject site as 'Moderate' to 'Low' with some areas of 'High' and 'Extreme' mapped groundwater vulnerability in the lands surrounding the peat bog. It is also stated that GSI did not map the presence of any karst features within the within the subject site nor were any karst features were recorded during the site walkover surveys or site investigations. Several karst features were mapped in the land surrounding the Proposed Project site, within the area mapped to be underlain by the Waulsortian Limestone Formation.
- There are no group or public groundwater abstractions in the vicinity of the subject site with the potential to be impacted by the proposed development.
- The hydrogeological regime at the subject site is characterised by high rates of surface water runoff and very low rates of groundwater recharge due to the presence of soils and subsoils of low permeability.

Section 9.5.2 predicts that no significant impacts to surface water (quality and flows) and groundwater (quality and quantity, and any local groundwater wells) will occur as a result of the proposed development provided the proposed mitigation measures, by avoidance and design (listed under each potential effect) are implemented. It is noted that some of the mitigation measures proposed include storing and handling of hydrocarbons/chemicals using best practice methods which will ensure the protection of surface and groundwater quality and designing the drainage system to slow surface water runoff from the site by providing greater attenuation. A hydrological assessment of potential impacts on hydrologically connected local designated sites was undertaken in Section 9.5.2.8. The River Shannon Callows SAC/pNHA (Site Code: 000216) and the Middle Shannon Callows SPA (Site Code: 004096) are considered to be hydrologically connected to the subject site. It is stated that following implementation of the appropriate mitigation measures as outlined in the EIAR no significant impacts are predicted to occur to this designated site will occur as a result of the proposed development.

In addition, it is noted that Section 9.5.6 refers to a Site-Specific Flood Risk Assessment, contained in Appendix 9-1, that has been completed for the proposed development which concludes that the proposed development has no potential to increase the downstream flood risk.

A Water Framework Directive (WFD) Compliance Assessment (Appendix 9-3) has been completed by the authors in Section 9.3.13 for all surface water and groundwater bodies, with the potential to be impacted by the Proposed Project. With the implementation of the stated mitigation measures, the applicant states that there will be no change in the WFD status of the underlying groundwater body or downstream surface waterbodies as a result of the Proposed Project. The applicant puts forward that the proposed development has been found to be fully compliant with the WFD and will not prevent any waterbody from achieving its WFD objectives.

An assessment of potential cumulative effects associated with the proposed development and other developments on the hydrological and hydrogeological environment has been completed in Section 9.5.7. The authors found with the implementation of the mitigation measures detailed in the EIAR and the cumulative assessment that there will be no significant effects on the hydrological and hydrogeological environments. The assessment also found that the cumulative effect with the Draft Rehabilitation Plan contained in Appendix 2-4 will result in an overall positive effect as the rehabilitation plans will improve surface water quality and attenuation within the Proposed Project site.

Comment:

1. A report from the Councils Environment and Water Services Section has been received, attached in Section 9 of this report, which has no objections to the proposed development subject to conditions. It is noted that a number of the suggested conditions relate to mitigation measures being implemented in the submitted Construction and Environmental Management Plan, Flood Risk assessment, Natura Impact Statement and Environmental Impact Assessment Report in addition to surface water.

2. While the applicant's assessment found that the cumulative effect with the Draft Rehabilitation Plan contained in Appendix 2-4 will result in an overall positive effect as the rehabilitation plans will improve surface water quality and attenuation within the Proposed Project site, the draft rehabilitation plan significantly pre-dates the current application, being 2024 or pre-2024 (see page 30). There are no maps submitted with the draft rehabilitation plan, therefore it is not possible to ascertain the level of synergies / interaction / new habitat conflict with the turbines / amenity or tourist potential.

Chapter 10: Air Quality

It is stated in Section 10.1.1 as background to the chapter that *"the production of energy from wind turbines has no direct emissions as is expected from coal or oil based power stations. Harnessing more energy by means of wind farms will reduce dependency on fossil fuel power stations, thereby resulting in a reduction in harmful emissions that can be damaging to human health and the environment. Some minor indirect emissions associated with the construction of the Proposed Project include vehicular and dust emissions".*

In relation to baseline air quality, Section 10.2.4 states that the air quality in the vicinity of the subject site is typical of that of rural areas of Ireland, i.e., Zone D. Prevailing south-westerly winds carry clean, unpolluted air from the Atlantic Ocean onto the Irish mainland. It is stated that most recent report on air quality in Ireland, 'Air Quality in Ireland 2023' published by the EPA in 2024 provides SO2, PM10, NO2 and O3 concentrations for areas in Zone D.

In relation to likely significant effects, Section 10.3.2 outlines some temporary or short-term indirect emissions associated with the construction of the proposed development which will include vehicular and dust emissions. Section 10.3.2.4 states that exhaust emissions of carbon dioxide (CO2), oxides of nitrogen (NOx), sulphur dioxide (SO2) or dust emissions during the operational phase of the proposed development will be minimal, relating to the use of and operation and maintenance vehicles onsite and controlled though detailed mitigation measures as outlined in Section 10.3.2.1, in relation to exhausts, and Section 10.3.2.2, in relation to dust.

It is noted that Section 10.3.5.2 states that; "The provision of an alternative to electricity derived from coal, oil or gas-fired power stations. The Proposed Project will result in emission savings of CO2, oxides of nitrogen (NOx), and sulphur dioxide (SO2). The production of renewable energy from the Proposed Project will have a long-term moderate positive impact on air quality due to the offsetting of approximately 56,375 tonnes of CO2 per annum".

Section 10.3.5 concludes that there will be no measurable negative cumulative effect with other developments on air quality at construction, operational or decommissioning stages.

Comments:
A report from the Councils Environment and Water Services Section has been received, attached in Section 9 of this report. The Environment Section has no objections to the proposed development subject to conditions. It is noted that a number of the suggested conditions relate to mitigation measures being implemented in the submitted Construction and Environmental Management Plan, Environmental Impact Assessment Report and environmental nuisance which relate to air quality.

Chapter 11: Climate

This chapter identifies, describes, and assesses the potential significant direct and indirect effects on climate arising from the construction, operation and decommissioning of the proposed development.

In relation to establishing a baseline for the subject site, Table 11-3 details mean figures for temperature, relative humidity, sunshine, rainfall, wind and weather. Section 11.3.1.3 refers to the most recent inventory report for Ireland, National Inventory Report 2025 and refers to the greenhouse gas inventory timeseries for the years 1990-2023 stating that; *"The Electricity sector accounted for the bulk of the CO2 emissions in 2023 (57.1%), Agriculture contributed 36.2%, while a further 5.2% emanated from Industrial Processes and Product Use and 1.5% was due to Waste. Emissions of CO2 accounted for 61.1% of the national total in 2023, with CH4 and N2O contributing 28.9% and 8.8%,*

respectively. The combined emissions of fluorinated gases (HFC, PFC, SF6 and NF3) accounted for 1.2% of total emissions in 2023".

It is noted from Table 11-5 (included below) that it is estimated that the proposed development will result in the expected loss of 261,360 tonnes of CO2 or a maximum 400,038 tonnes of CO2 over its 35 year life. It is noted that 37,622 tonnes of CO2 emissions is expected or 173,231 CO2 emissions maximum in relation to CO2 loss from removed and drained peat.

Origin of Losses	CO_2 Losses (tonnes CO_2 equivalent)	
	Expected	Maximum
Losses due to turbine life (e.g., manufacture, construction, decommissioning)	77,078	78,480
Losses due to backup	60,293	61,298
Losses from reduced carbon fixing potential	1,985	2,646
Losses from soil organic matter and due to leaching of dissolved and particulate organic carbon (CO_2 loss from removed and drained peat)	37,622	173,231
Losses associated with embodied carbon in construction materials	82,933	82,933
Losses associated with traffic and transport movements	1,450	1,450
Total	261,360	400,038

Figure 10: CO2 losses from the Proposed Project (Source: Table 11-5 of EIAR)

Section 11.4.3.1.1 states that during the construction and operation phase of the proposed development, the lands beneath the proposed project footprint will not be available to develop into carbon sequestering habitat. It is noted that Table 11-6 from this section as shown below details that the percentage loss of carbon sequestration arising from the construction of the proposed development is determined to range from 8.2% - 17.6%.

Description	Windfarm	Windfarm plus 5m Buffer (Note 1)
Total Footprint (Ha)	34.4	74.3
Carbon sequestration factor (tCO2/ha/yr)	3.82[61]	3.82[62]
Rewetted Footprint carbon savings (tCO2/ha/35yr)	4,599	9,934
Area of the site (Ha)	1,258	1,258
Area of the site assume to actively sequester carbon (Ha)	629	629
Proposed Wind Farm carbon savings total (tCO2/35yr)	56,375*	56,375*
% loss of carbon sequestration (30yr)	8.2%	17.6%

Figure 11: Assessment of potential loss of carbon sequestration due to the Proposed Project (Source: Table 11-5 of EIAR)

In relation to the projected carbon savings associated with the proposed development, Section 11.4.3.2 states that;

"…56,375 tonnes of carbon dioxide will be displaced per annum from the largely carbon-based traditional energy mix by the Proposed Wind Farm. Over the proposed 35-year lifetime of the development, therefore 1,973,125 tonnes of carbon dioxide will be displaced from traditional carbon-based electricity generation… The 261,360 tonnes of CO2 that will be lost to the atmosphere due to changes in soil and ground conditions and due to the construction and operation of the Proposed Project will be offset by the Proposed Wind Farm in approximately 56 months (4.6 years) of operation".
It is noted that specific mitigation measures relating to the greenhouse emissions from the construction phase of development, operational phase and decommissioning stage of the proposed development are included Section 11.5.2, 11.5.3 and 11.5.4 of the EIAR.

Chapter 12: Noise and Vibration

This chapter assesses the likely significant environmental noise and vibration effects of the Proposed Project.

In relation to the existing noise baseline, the below Noise Study Area was included in Figure 12.2 and is based on the areas predicted to exceed 35 dB LA90 from all existing, permitted, and proposed wind turbines.

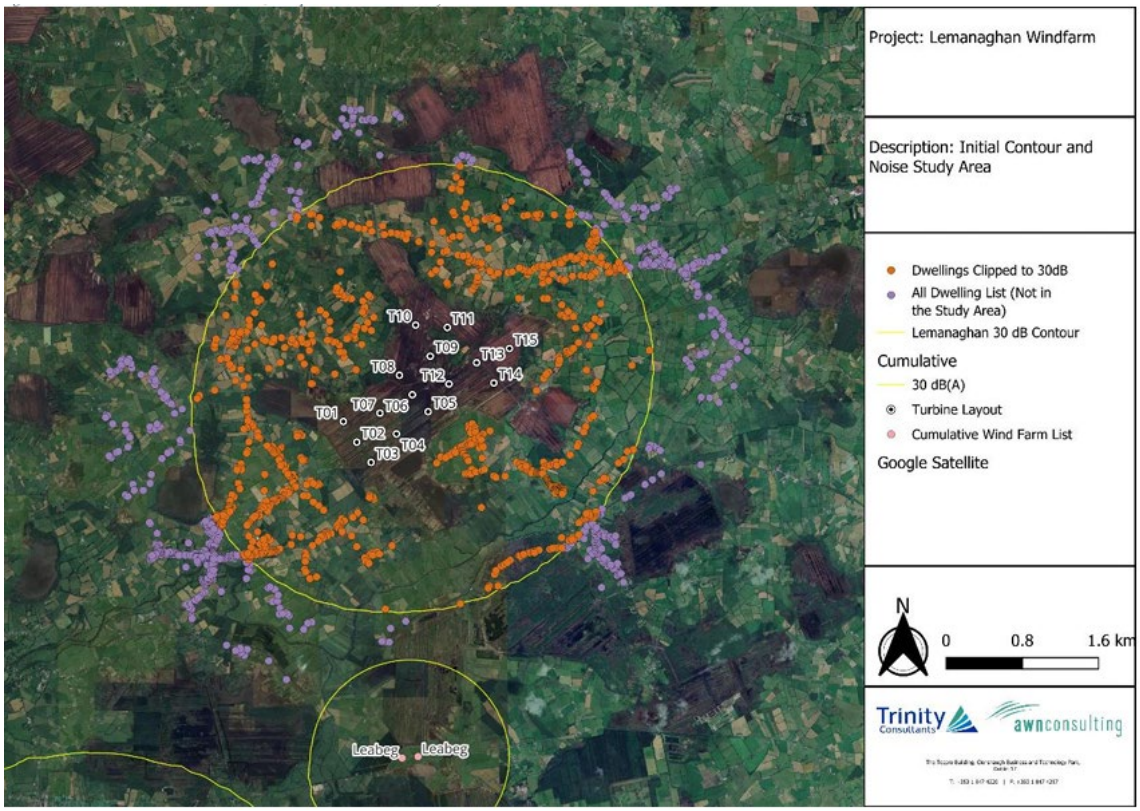


Figure 12: Noise Study Area (Source: Figure 12.2 of EIAR)

In relation to the selection of noise monitoring locations, Section 12.3.4.1 refers to choosing any NSL that fell inside the predicted 35 dB LA90 noise contour in line with current best practice guidance outlined in the IOA GPG. Figure 12.3 shows the noise monitoring locations.

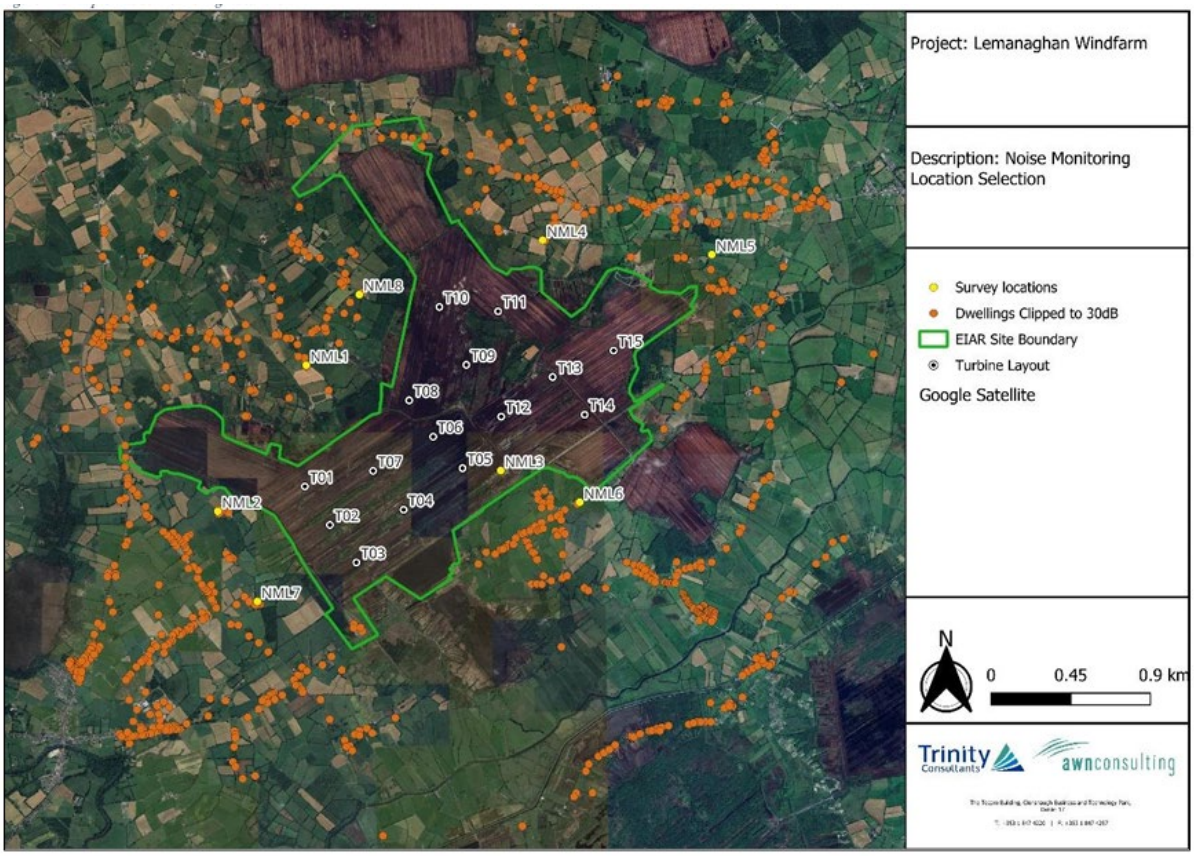


Figure 13: Noise Monitoring Locations (Source: Figure 12.3)

Table 12-9 outlines the noise monitoring periods from September to November 2021 at each NSL while Figure 12-4 shows the variety of wind speeds and weather periods encountered.

For the purposes of the noise modelling, the authors use a Vesta V150 at 145 metre hub height turbine and based on the proposed site layout and the details of turbine noise emissions, hub height, and tip height for the range of turbine types considered in the assessment, turbine noise levels have been predicted at NSLs across a range of operational wind speeds in Table 12-12 of Section 12.3.7.3. Background noise levels from each of the monitoring locations in Section 12.4.1.

Within Section 12.4, Table 12-13 and 12-14 present the various derived LA90,10min noise levels for each of the NMLs for daytime quiet periods and night-time periods.

Section 12.5 outlines the likely significant effects on the noise and vibration environment from;

- The General Construction of Turbines, Hardstand Areas and Anemometry Mast

Quality	Significance	Duration
Negative	Not Significant	Short Term

- Borrow Pit Excavation and Reinstatement

Quality	Significance	Duration
Negative	Not Significant	Short Term

- Peat Deposition

Quality	Significance	Duration
Negative	Not Significant	Short Term

- Temporary Construction Compounds

Quality	Significance	Duration
Negative	Not Significant	Short Term

- Biodiversity Management and Enhancement Areas

Quality	Significance	Duration
Negative	Not Significant	Short Term

- Substation and Ancillary Construction Works

Quality	Significance	Duration
Negative	Not Significant	Short Term

- Proposed Grid Connection and OHL Cabling Construction

Quality	Significance	Duration
Negative	Not Significant	Short Term

- Construction Traffic

Quality	Significance	Duration
Negative	Not Significant	Short Term

- Operational phase of turbines

Quality	Significance	Duration
Negative	Not Significant	Short Term

- Fixed Plant Noise

Quality	Significance	Duration
Negative	Not Significant	Short Term

In relation to mitigation measures, it is noted that Section 12.6 states that; *"The assessment of potential effects has demonstrated that the Proposed Project is expected to comply with the identified criteria for the construction, operational and decommissioning phases of the Proposed Project and therefore no specific mitigation measures are required other than best practice guidance and methods outlined below."* The author refers in this regard to noise control measures outlined in the Construction and Environmental Management Plan (CEMP) and Draft Noise Complaint Management Protocol contained in Appendix 4-4 and Appendix 12-6 accompanying the EIAR.

It should be noted that Section 12.3.2.4.7 refers to the definition of 'Amplitude Modulation' (AM) from IOA Noise Working Group (Wind Turbine Noise) Amplitude Modulation Working Group (AMWG) document 'A Method for Rating Amplitude Modulation in Wind Turbine' (IOA, 2016) as: *"Periodic*

fluctuations in the level of audible noise from a wind turbine (or wind turbines), the frequency of the fluctuations being related to the blade passing frequency (BPF) of the turbine rotor(s)."

In relation to monitoring, Section 12.6.4.1 includes a commitment from the developer that prior to the commissioning of the Proposed Wind Farm, a Noise Compliance Monitoring Programme will be submitted to the planning authority for written agreement. The Noise Compliance Monitoring Programme is to include a detailed methodology for the noise measurements, procedures for recording results and locations at which noise is to be monitored.

Comment:
The Vestas V150 appears to have 2 no. power output options, notably 4MW and 4.5MW. However, at 90MW and 15 turbines, it is the view of the PA that the windfarm as proposed would require 6MW turbines and the predicted noise should be modelled accordingly. This matter is required to be addressed.

Chapter 13: Cultural Heritage

Section 13.1.4.5 outlines relevant policies and objectives from the Offaly County Development Plan 2021-2027 in relation to architectural and archaeological heritage.

Section 13.2 outlines the existing cultural heritage environment in which the subject site is located.

- Section 13.2.2.1.1 refers to two UNESCO World Heritage Tentative List sites which are located within 25 km of the subject site; the Hill of Uisneach and Birr Castle and Demesne.
- Six National Monuments in state care and eight monuments subject to a Preservation Order are located within 15km of the nearest proposed turbine. The nearest National Monument comprises Gallen Abbey which is located c. 4.1km south-west of the nearest proposed turbine.
- Section 13.2.2.1.3 states that 491 recorded monuments are located within the subject site , comprising;
  - 114 Class 1, 2 and 3 toghers and gravel/stone trackways;
  - 371 'structure – peatlands'. These structures are described as comprising "wood found in peat, which has been deliberately deposited or processed and can vary from single pieces to deposits without a clear form or orientation but which are indicative of an archaeological structure. They may be of any date from the Neolithic (c. 4000-2400 BC) to the medieval period (5th-16th centuries AD)".
  - Three platforms (OF007-346----, OF007-347---- and OF007-348----). These monuments comprise a non-linear artificially raised area, usually of wood, with or without a clear shape found in a peatland context;
  - One post row (OF015-345----) which are described as "a line of related posts, including stakes, in a peatland context. In certain instances, they may be the vestigial underpinnings of single-plank toghers and may date from prehistory (c. 8000 BC - AD 400) to the early medieval period (5th-12th centuries AD).
  - Two enclosures (OF007-048---- and OF007-049----) are located within the Proposed Project site (Figure 13-20).

    It is noted that all recorded monuments on the subject site are shown in Figure 13-8. See below.

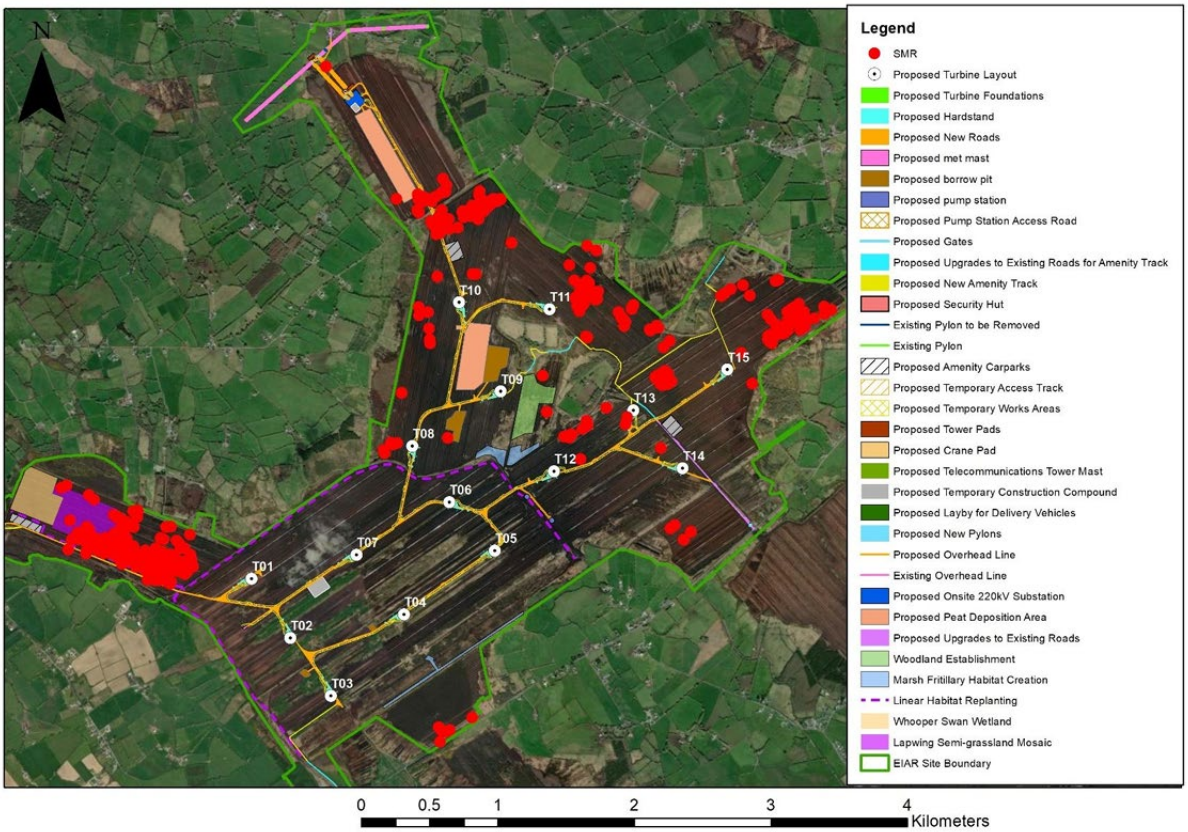


Figure 14: Recorded Monuments within the proposed project site (Source: 13-8 of EIAR)

Figure 15: Complex of monuments at Lemanaghan monastic site (Source: 13-9 of EIAR)

It is stated in Section 13.2.2.1.11 that no Protected Structures are located within the subject site but a total of 47 Protected Structures are located within 5km of the nearest proposed turbine, with at least 17 of which are located in Ferbane village. It is stated that the nearest Protected Structures comprise;

- a thatched house (11-06) at Killaghintober c. 900m north of the nearest proposed turbine, T11.
- At a distance of c. 1km from T15 is the fortified house at Castlearmstrong (11-9) which is also a recorded monument (OF007-037----).

Section 13.2.2.1.12 states that a total of 42 NIAH structures are located within 5km of the nearest proposed turbine.

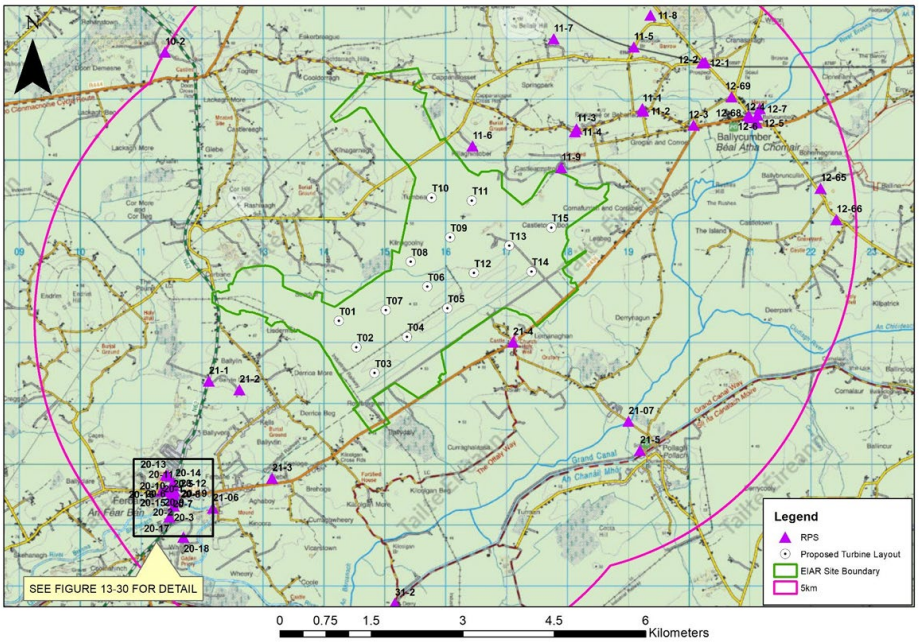


Figure 16: Protected structures within 5km of the nearest proposed turbine (Source: Figure 13-26 from the EIAR)

Section 13.2.2.2 states that no recorded cultural heritage assets are located within the footprint of the proposed 220kV substation to the north of the site or to the proposed grid connection infrastructure located under the existing overhead line. The nearest recorded monument comprises a class 2 togher OF007-343---- which is situated c. 270m north-west of the proposed 220kV substation.

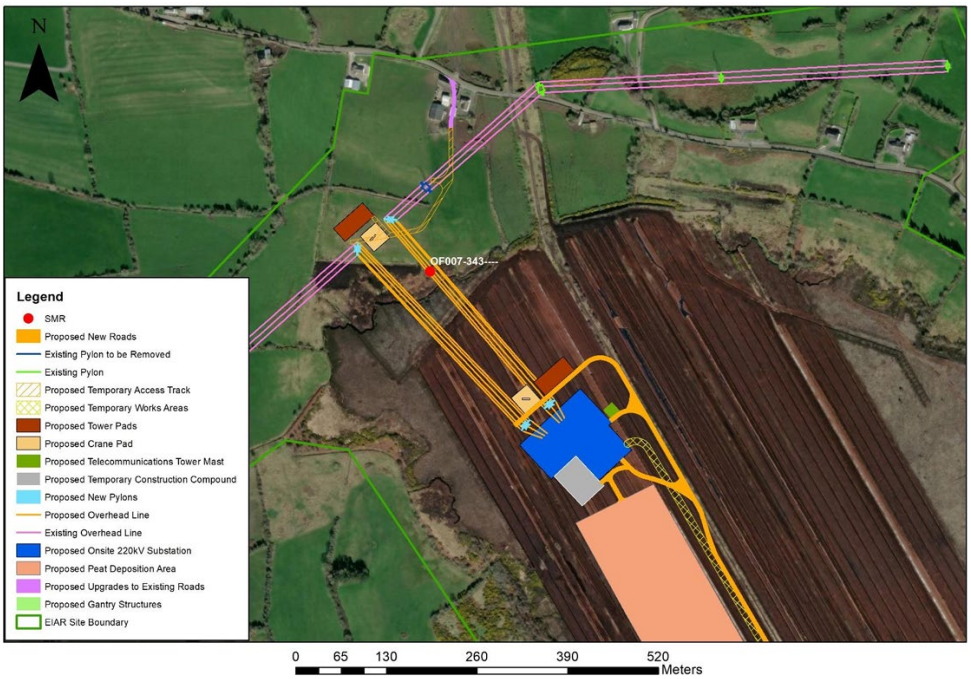


Figure 17: Proposed Grid Connection in relation to nearest recorded monument OF007-343 (Source: Figure 13-42 of EIAR)

Section 13.3.3 outlines the likely effects and associated mitigation measures in relation to the construction phase of the proposed development. It is noted that it is stated in this section that;

- All recorded monuments have been excluded from the proposed enhancement areas and in this regard no potential direct effects to same will occur. It is not considered that the works required for these areas have the potential for direct effects to sub-surface archaeology.
- No direct effects are identified to the two UNESCO World Heritage Tentative List sites which are located within 25 km of the subject site; the Hill of Uisneach and Birr Castle and Demesne as a result of the proposed development;
- No direct effects to any National Monument or those subject to a Preservation Order are identified;
- The construction phase will not have any significant effects on any Recorded Monument since they will be dealt with by way of mitigation measures. The overall significance of effects is deemed 'Not Significant'.
- No previously unrecorded archaeological monuments, stray finds or potential peatland structures were noted within the proposed project site during the walk-over survey. In this regard no potential direct effects to such finds or sites are identified.
- The construction phase will not have any significant effects on unrecorded potential sub-surface sites since they will be dealt with by way of mitigation measures. The overall significance of effects is deemed 'Not Significant'.
- No Protected Structures subject to statutory protection are located within the proposed project site therefore no potential direct effects to this resource are identified.
- No NIAH structures or historic gardens are located within the proposed project site therefore no potential direct effects to this resource are identified.

Section 13.3.4 outlines the likely effects and associated mitigation measures in relation to the operational phase of the proposed development. It is noted that it is stated in this section that;

- While the turbines will be visible from the Hill of Uisneach, its setting or its associated monuments will not impacted from the proposed development given the distance and as the proposed turbines will not compete with the elevated location of the Hill of Uisneach as a

dominant feature in the landscape. As such, the visual change as a result of the proposed wind farm is considered small in scale, leading to a low magnitude of change. In relation to Birr Castle, as the ZTV demonstrates no theoretical visibility of the proposed turbines from Birr Castle and Demesne, no potential visual effects to this UNESCO WH Tentative List site as a result of the Proposed Project are identified.

- The operational phase will not have any significant effects on National Monuments. The overall significance of effects will be Not Significant.
- The operational phase will not have any significant effects on Recorded Monuments on site having regard to the lack of visibility or discernible presence of these monuments within the subject site. It is stated in this regard that *"the vast majority of these monuments are considered to have low or no visibility in the landscape as they comprise sites that were detected during the 1993-4 Peatland Survey and which at that time were located either on the bog surface or were visible in drain sections, being partially sub-surface."*
- In relation to the Lemanaghan Monastic Complex, using the distance to the nearest turbine and the number of turbines visible from the cultural heritage asset will have a Moderate, Negative, Long Term effect, which is deemed 'Not Significant' to the wider setting of monastic complex.
- No potential visual effects to the setting of previously unrecorded monuments are identified;
- The overall significance of effects on Protected Structures in the area is deemed 'Not Significant'. It is stated in this regard that the distance of Protected Structures from the proposed turbines will mitigate some potential visual effects.
- Effects on NIAH structures or Historic Gardens are not deemed significant.

An assessment of potential cumulative effects was also undertaken in Section 13.4 of the EIAR taking into consideration other planning applications, the historical industrial peat extraction at Lemanaghan Bog, and identified cumulative wind farm projects within 25km. No significant cumulative effects were identified and no cumulative effects to the immediate setting of cultural heritage assets are deemed to occur.

It is noted that this chapter is supported by a number of appendices to the EIAR; Recorded Monuments within the Proposed Project Site 2026 (Appendix 13-1), Recorded Monuments within the Proposed Project Site 2026 (Appendix 13-2), Photographic Record (Appendix 13-3), Excavations Database Entries (Appendix 13-3), Excavations Database Entries (Appendix 13-4), Lemanaghan Monastic Complex (Appendix 13-5), Lemanaghan SI Monitoring Report (Appendix 13-6) and The Archaeology of Lemanaghan Bog (Appendix 13-7).

Comments:
Chapter 13 – Cultural Heritage

1. Please refer to the Council's internal report - Architectural, Biodiversity and Heritage Conservation report.

2. The Lemanaghan Monastic Site represents a highly sensitive and nationally significant heritage asset, whose value derives not only from surviving physical fabric but also from its wider landscape setting, visual prominence and historic relationship with the surrounding environment. The appreciation and legibility of this early medieval monastic complex are intrinsically linked to its open and relatively undeveloped setting and to long established views both towards and from the site.
   The Planning Authority has serious concerns regarding the likelihood for significant adverse impacts arising from the proposed development on the archaeological, cultural

and landscape context of the monastic complex at Lemanaghan and on the setting, character and visual amenity of Bellair Hill and House. The Planning Authority therefore requests that if ACP were not of a view to refuse permission, that an ***overall project be completely reappraised in relation to its layout. It is respectfully requested that the removal of turbine numbers 5, 9,10, 11, 12, 13, 14 and 15*** be imposed so as to meaningfully address the highlighted sensitivities and constraints attached to this historic landscape and to comply with the proper planning and sustainable development of the area.

3. According to the EIAR, a total of 491 Recorded Monuments are located within the boundary of the Proposed Project site. These monuments are primarily associated with the historic peatland landscape and were largely identified during the Archaeological Survey of Ireland Peatland Survey (IAWU, 1993–1994).
   The recorded monument types within the site include:

- Roads / Trackways (114), including toghers and gravel or stone trackways;
- Structures – Peatland (371), comprising worked or deliberately deposited timber and other materials preserved in peat;
- Platforms – Peatland (3), interpreted as raised activity platforms;
- Post Row – Peatland (1), likely associated with movement across the bog;
- Enclosures (2), surviving as subsurface features with no above ground expression.
  While many of these monuments no longer have visible surface expression due to historic industrial peat extraction, they remain part of the recorded archaeological resource and must be treated accordingly. The EIAR appropriately addresses this through design avoidance, floating road construction where required, archaeological monitoring and licensed testing.
  In particular, it is noted that there exists an extremely high density of recorded monuments, comprising a Class 1 Togher, Class 2 Toghers and Class 3 Toghers, to the west of the site, as shown below in Figure 13-9, 13-11 and 13-15 from the EIAR, where it is intended to provide a new internal access road and site entrance to the site onto the N62. The Planning Authority ***request that the internal layout and site access arrangements be revised to ensure that the developer leaves this area untouched, without any internal access roads or access from the N62***, in order to safeguard existing recorded monuments but also potential future archaeological / historical discoveries.
- It is acknowledged that the above point, taken in conjunction with comment 2 in relation to Chapter 8 above, would mean that both of the northern 'spurs' extending outwards from this are being queried. This has clear implications for construction access and the grid connection, however these aspects, together with other concerns should, in the planning authority's view set the requirement for a comprehensive reappraisal of this proposed development having regard to heritage & landscape (including historic landscape) aspects, amenity, biodiversity & rehabilitation potential.

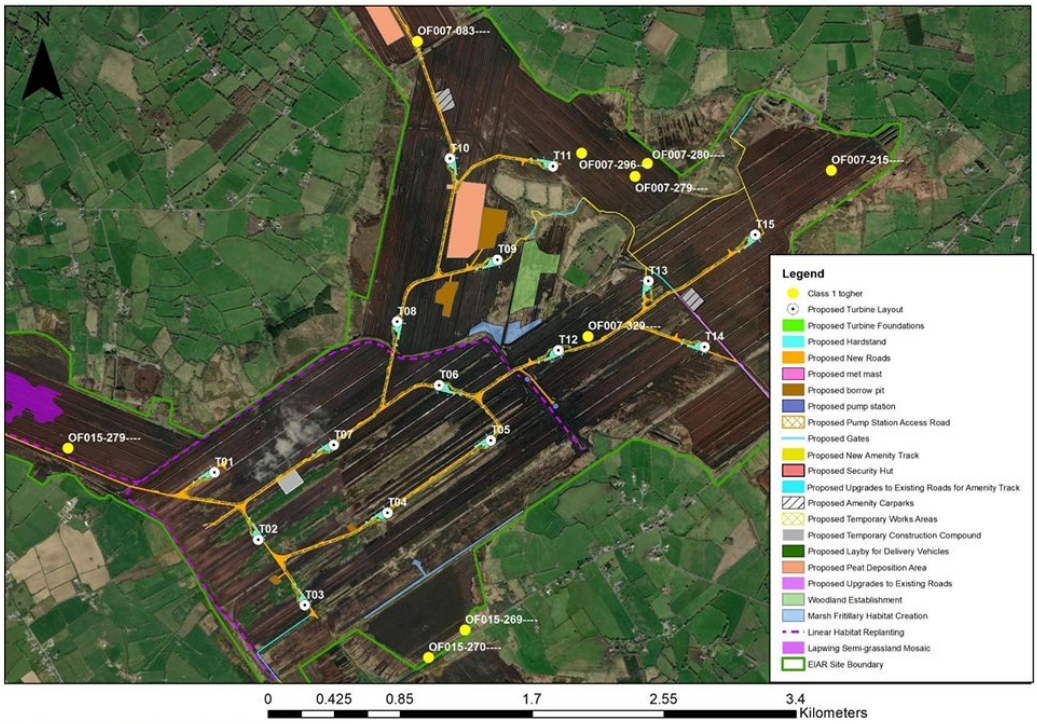


Figure 13-9: Class 1 toghers within the Proposed Project site.

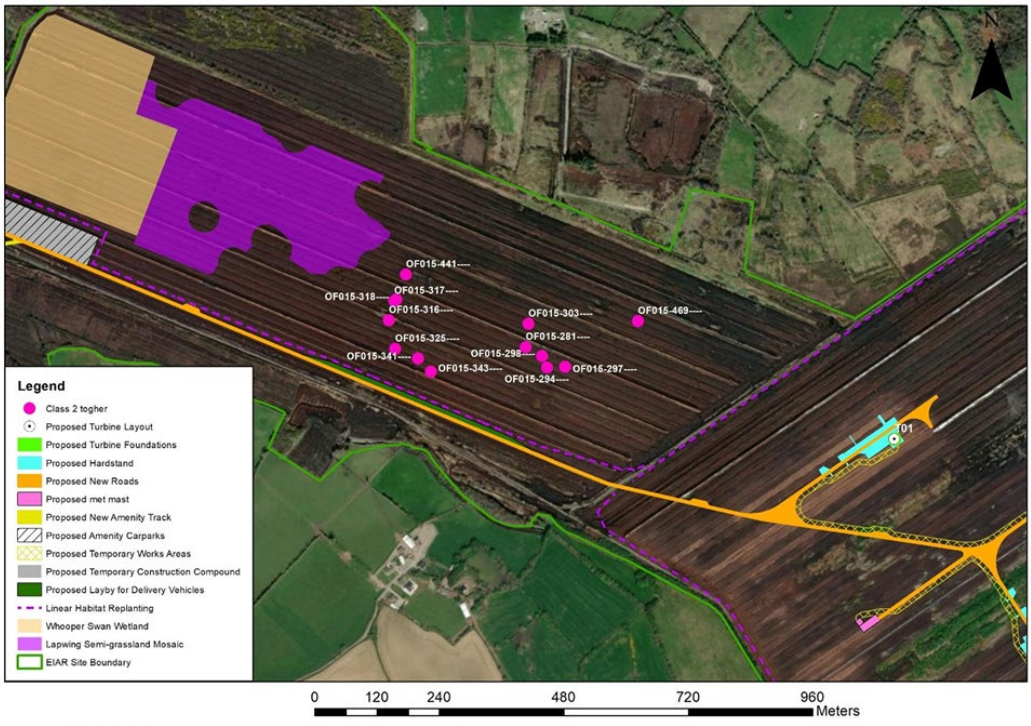


Figure 13-11: Detail of Class 2 toghers at the west side of the Proposed Project site.

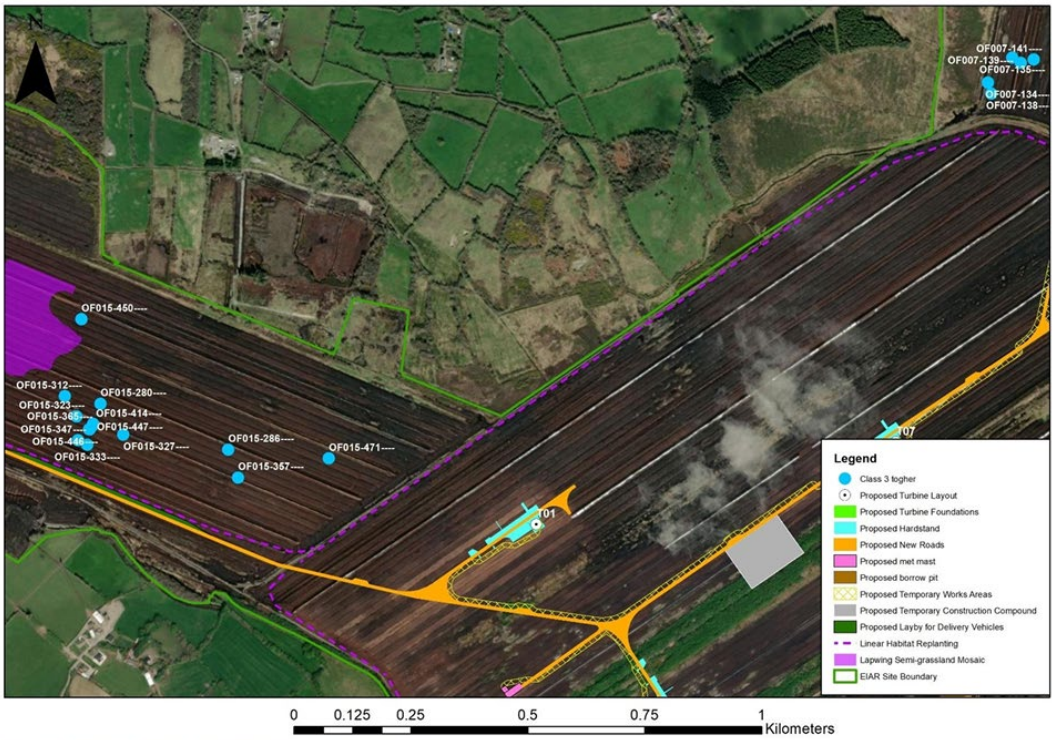


Figure 13-15: Class 3 toghers in the western portion of the Proposed Project site.

4. While the EIAR concludes that impacts on Protected Structures and NIAH-listed buildings are limited to changes in the wider landscape setting and are therefore assessed as 'Not Significant', it is considered that this conclusion does not fully reflect the sensitivity, complexity and cumulative vulnerability of the receiving heritage environment.

(a) From an architectural conservation perspective, greater weight should be afforded to the scale, proximity and cumulative visual presence of the proposed turbines and to the manner in which they would affect the setting, perception and experiential appreciation of key heritage assets. This is particularly relevant in relation to the Lemanaghan Monastic Site, where turbines are located at distances considered unacceptably close from a conservation standpoint, resulting in sustained and overbearing visual impacts that diminish the openness, archaeological legibility and landmark qualities of this nationally significant monastic landscape.

(b) It is further noted that Bellair House and Bellair Hill, despite their relative proximity to the proposed development and their elevated vantage point, have not been adequately assessed within the EIAR. The absence of verified photomontages from Bellair Hill represents a notable gap in the assessment, and additional visual material is required to allow a complete and balanced understanding of potential impacts on the setting of this Protected Structure.

(c) The proposed development is situated in close proximity to established dwellings and to a number of Protected Structures. The combined effects of daytime visual change, night-time aviation lighting and operational noise have the potential to influence the setting, character and lived experience of nearby heritage assets and historic places. These indirect and cumulative effects warrant explicit acknowledgement within the overall conservation assessment.

(d) Having regard to the cumulative concentration of wind energy development within the wider Midlands and the sensitive heritage environment surrounding Birr, it is considered that the current layout and scale of the proposal would benefit from further refinement. This may include a reduction in turbine numbers, increased

separation distances from significant heritage assets and residential areas, and a more strategic consideration of cumulative landscape capacity.

Appendix 13-5: Lemanaghan Monastic Complex: Historical, Landscape and Visual Context

It is considered that that this report in Appendix 13-5 which is to support Chapter 13 of the EIAR, is too narrowly focused on the monastic site itself and not the wider heritage and historic landscape context.

This report appears to take the position that because there are few existing visual linkages between the Monastic site and the wider landscape, for example, as referred to in Section 1.3, the dry island and Castle Armstrong and beyond, that impacts are low.

The report further states in Section 1.3 that "*While the date of the aforementioned toghers provides evidence for the use of the bog within the Proposed Project site during the early medieval period around the time of the establishment of St. Mangan's monastery at Lemanaghan, it does not automatically infer a direct connection between such sites and the Monastic Complex*". This appears to the PA to be a very light test, and it is considered that further examination is required to addressed same..

However, the plethora of SMRs [OF014-029001---, OF014- 029006, OF014-029017 to OF014-029027---, OF016-015001---, OF016---, 015010---, OF006-038---, OF005-005---, OF009-005001- to OF009-005018, OF009-006, OF009-031---, WM029-008---, OF015-017----, OF001-001----, OF023-010----, OF022-008001-, WM030-065----, WM030-047----, OF024-036003- and OF005-027001-, in particular the linear groupings (shown as linear SMRs) surely give more credence to the need to tread carefully and strongly consider avoiding these parts of the site.

It appears that the report ignores that the archaeology, toghers (either visible in part or assumed), known parts of historic linkages, were very likely desire lines between the monastic site and sites to the north and could potentially be;

- established through further study; and
- manifested into a partial re-establishment of pilgrim's routes

forming a 'historic landscape' which warrants protection.

Plates 5 & 6, shown below, in the PA's view gives a very clear indication of this 'historic landscape', with Togher OF15-084 more than likely joining up with the east flank of Lemanaghan bog. see map in the Lemanaghan Conservation Plan below.
See also the map from the Lemanaghan Conservation Plan below which makes a recommendation for reinstating / re-creating an historic Pilgrims Route between the Monastic site and Castle Armstrong / Boher. Please note that within the Conservation Plan, a previously proposed route along the dotted line was seen as too sensitive to damage, being the remains of an ancient stone togher to the monastic site.

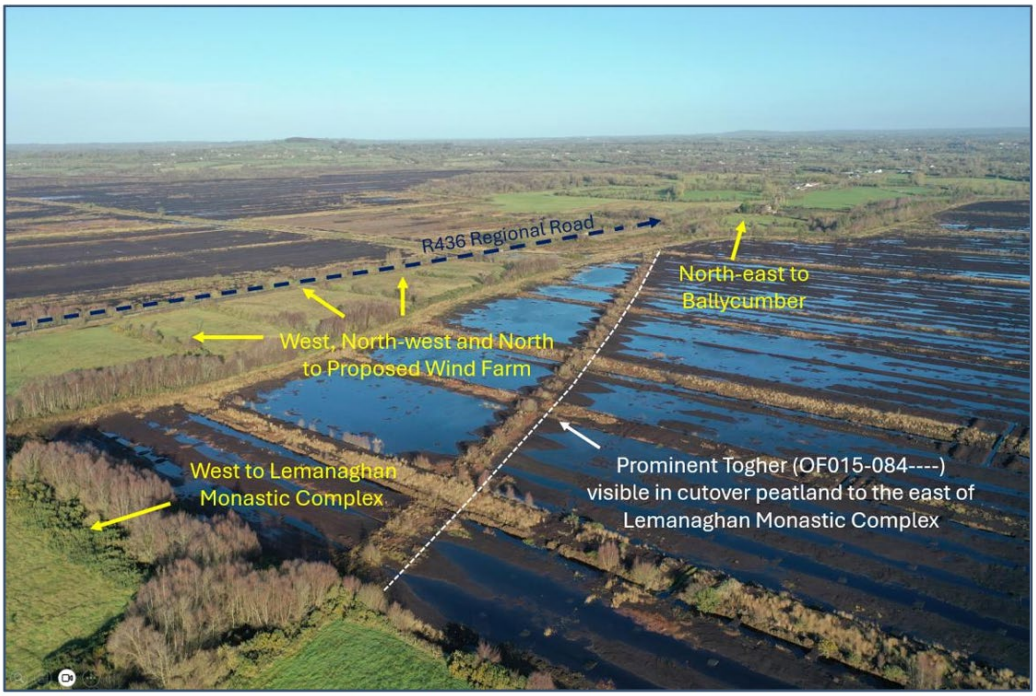


Plate 5, Section 1.1.2 Current Geogrphic Context, Appendix 13-5

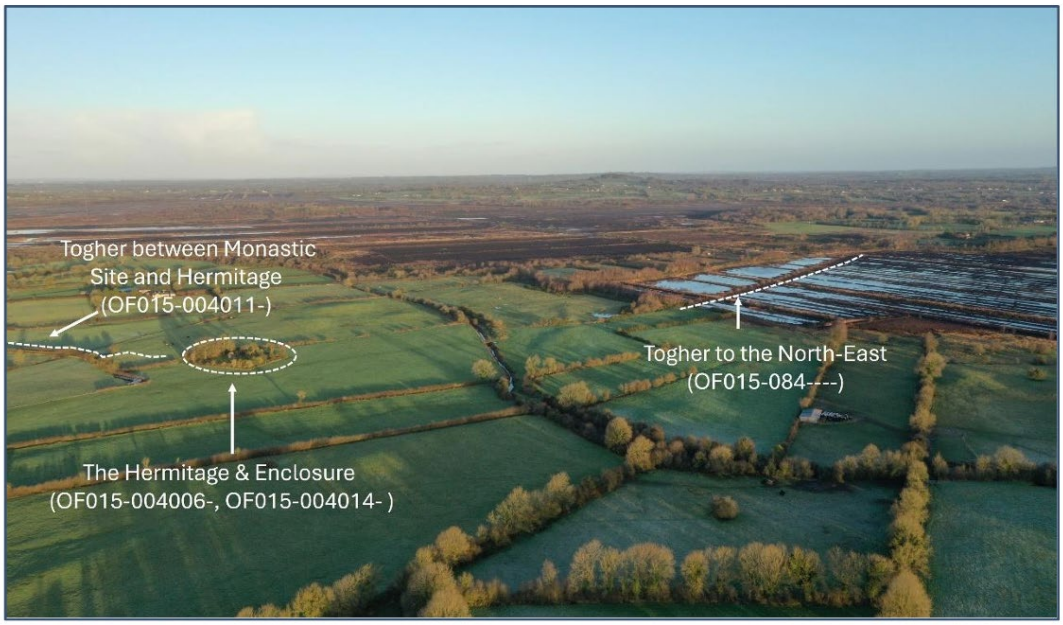


Plate 6, Section 1.1.2 Current Geogrphic Context, Appendix 13-5

This image assists in highlighting concerns in respect of visual amenity and it is respectfully restated that turbine numbers 9 & 10 should be omitted from any future development on this site, permitted.

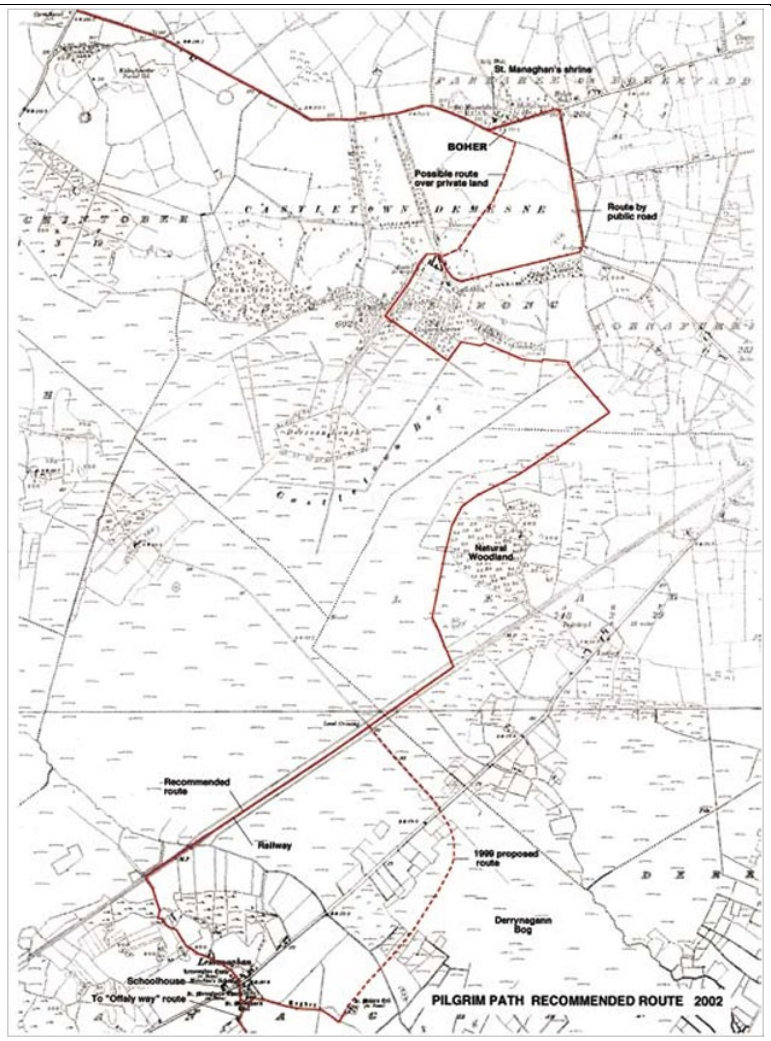


Figure 8: A Map of the Pilgrim Path, Lemanaghan Conservation Plan, 2007

The narrative of a 'visitor experience' in Section 1.4 does not accurately describe the landscape vista from the area of St Melia's Cell / the Hermitage across the bog towards Bellair.

VP14 is taken from the rear of the site and makes best use of vegetation, but more importantly, plate 16 looks towards the enclosure rather than from it or from the path leading towards the potentially historic landscape which the person is at, rather than from the monument.

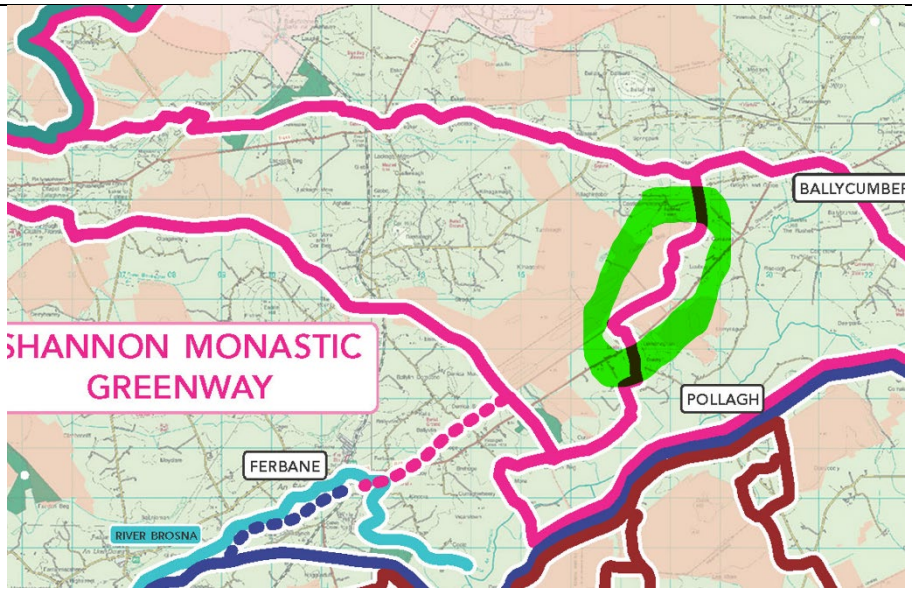
Plate 14: Views towards proposed turbines (VP14), Appendix 13-5

Plate 16: Typical Journey Scenario within the Monastic Complex: View towards the Hermitage along the OF015-004011- Road, Appendix 13-5

It is considered the point expressed in Section 1.6.1 that there are views across this landscape on the return journey from the Hermitage "*experienced for a short period of time*" completely misses the point in relation to the importance and context of this view.

It similarly dismisses fairly easily the potential connection or part of the *Sli Mor* in Section 1.3 in saying that an association is not enough, and any physical manifestation, if it existed, has been lost.

The report also dismisses the establishment of part of the Pilgrims Route in Sections 1.3 and 1.4 more or less because the action from the Conservation Plan i.e. to consider re-instating or re-creating it hasn't yet been done - rather than assessing its merits and any alterations that should be made to the development as a result. It is stated in Section 1.4.1 of the Report in this regard that; *"There is no public record confirming that the Lemanaghan Conservation Plan was formally implemented such that the Pilgrim Path became a managed, maintained way marked walking trail, or a designated recreational route formally protected through the local planning policy"*.
Further, while not a heritage issue per se, it completely fails to mention that this route is picked up in the *Midland Cycling Destination – Offaly* (MCD-O) as part of the proposed Shannon Monastic Greenway, which has historic connotations. It should be noted that there exist a number of objectives within the Offaly County Development Plan 2021-2027 to progress the routes outlined in the *MCD-O.* Bord na Mona was a party to the MCD-O, along with Coillte and Offaly County Council.



Extract from *Midlands Cycling Destination – Offaly* map (see Objective TRO-15 of the Offaly County Development Plan 2021-2017) showing part of the 'Shannon Monastic Greenway' which has its basis in the route proposed by the Lemanaghan Conservation Plan.

Chapter 14: Landscape and Visual

Section 14.3.1 outlines that ZTV mapping is used to examine the theoretical visibility of the proposed turbines from all landscape and visual receptors.

Figure 14-1 from Section 14.3, see below, uses ZTV mapping to show the visibility of the proposed turbines in the study area taking into account topography and man-made features. It is stated in relation to the prevailing landscape that: *"The proposed turbines are situated in a predominantly flat lowland landscape allowing for stretches of full theoretical visibility within 10km of the proposed turbines, excepting small pockets of partial theoretical visibility from slight topographical undulations. The terrain is flattest to the south of the proposed turbines, with contours showing less than 20m of change in elevation. Endrim, Cor and Bellair Hills are the only notable topographical features within 10km of the proposed turbines. These landforms cause pockets of no theoretical visibility and as such, limit visibility of the proposed turbines from receptors in these directions".*

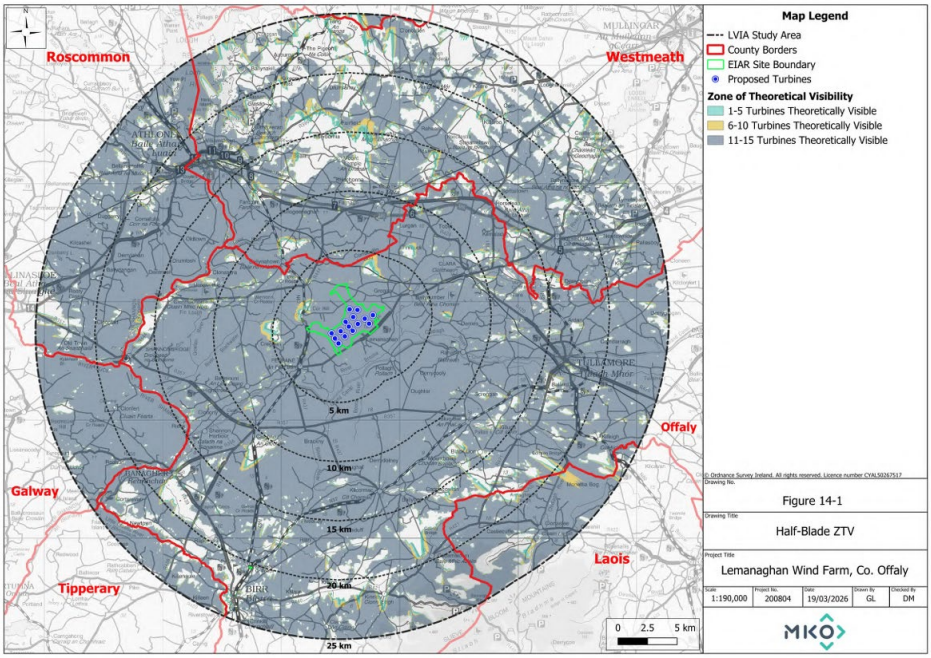


Figure 18: Half Blade ZTV mapping (Source: Figure 14-1 from EIAR)

Figure 14-2 from Section 14.3 shows the prevailing contours in the study area, see below.

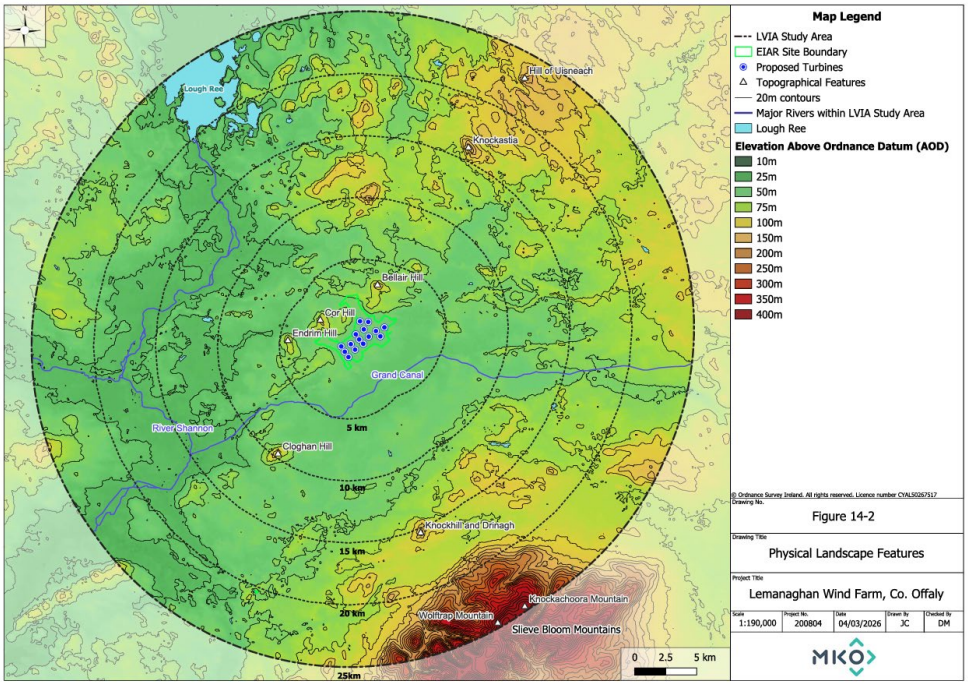


Figure 19: Physical Landscape Features (Source: Figure 14-1 from EIAR)

Section 14.4 outlines the landscape baseline reports pertinent to the Landscape and Visual Impact Assessment (LVIA), as well as a description of the receiving landscape of the Proposed Project site and its wider setting within the study area. Figure 14-5 shown below, maps the landscape designation areas from the different County Development Plans which apply in the study area.

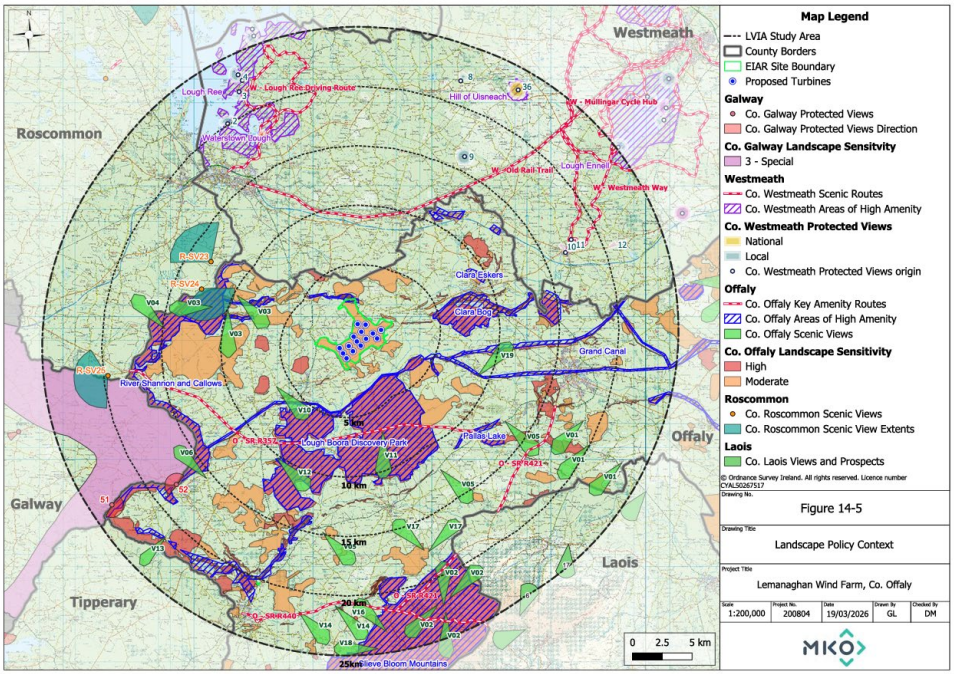


Figure 20: Landscape Policy Context (Source: Figure 14-5 from EIAR)

It is noted that Section 14.4.1.1 details the landscape and natural heritage policies and objectives from the Offaly County Development Plan 2021-2027 which apply to the proposed development while the following Section 14.4.1.2 address landscape policy in surrounding counties.

Section 14.4.2 outlines the landscape character of the proposed project site. It is noted that the Proposed Project site is described as comprising a large relatively flat expanse of open peatlands located within the flat lowland landscape of County Offaly. The character of these peatlands is stated to strongly influenced by the industrial peat extraction practices historically conducted at the site, which now resembles a cutover peatland landscape, with limited scenic or aesthetic qualities pertaining to this landscape. The landcover within the subject site is described as comprising a mix of bare cutaway peat, re-vegetated peat, degraded bog, and scrub vegetation with industrial elements such as railways infrastructure.

Section 14.4.2.2. outlines the historic landscape character of the surrounding area; Lemanaghan Monastic Site, Slí Mhór and the Esker Riada, and the Grand Canal.

Section 14.4.2.3 details the landscape character of the part of the subject site on which it is proposed to construct a grid connection, substation compound and buildings.

Section 14.4.3 explains the methodology informing determination of landscape value. It is noted that the determination of landscape value takes into consideration the scenic amenity designations and landscape sensitivity and value designations found in the local landscape policy, as well as other indications of landscape value attached to undesignated landscapes, including:

- Landscape designations (LCA setting, Scenic Routes and Views, amenity areas, etc.)
- Quality/condition of landscape elements
- Scenic/aesthetic qualities
- Rarity/conversation status
- Wildness/naturalness
- Recreational value

- Cultural meaning/associations.

The ratings of Value and Susceptibility range from High, Medium, or Low, while the overall Sensitivity is assigned as Very High, High, Medium or Low.

It is stated that having regard to these factors and designations outlined in the Offaly County Development Plan that; *"The landscape value of the Proposed Project site is deemed to be 'Low/Medium'. There is value to the historic and cultural landscape of the site and setting, however it is a highly modified and degraded landscape from historic peat harvesting. The susceptibility of the landscape of the site to the proposed change of wind energy development is 'Low' considering local planning policy indicating the suitability of degraded cutover peatlands for wind energy development in County Offaly and the general suitability of cutover peatlands (See pg. 107 of DoEHLG 2006 Guidelines) as large uninhabited areas surrounded mature boundary vegetation capable of accommodating wind energy developments. Overall, the sensitivity of this landscape to a wind farm development is deemed to be 'Low'.*

Section 14.5.1 identified following visual receptors within the LVIA Study Area that were considered for assessment; Designated Scenic Routes and Views Settlements Recreational Routes (Waymarked Walking Routes; Cycle Routes; Scenic Drives; Tourist Routes) Recreational, Cultural Heritage and Tourist Destinations Transport Routes.

Section 14.5.3 states that residential receptors located in close proximity to the site will likely have views of the proposed turbines and are likely to have the greatest visual effects arising as a result of the proposed turbine and that 10 no. of the Viewpoint (VPs) in close proximity (within 5km) were selected to represent residential receptors (as well as other receptors) for inclusion as photomontages in the EIAR Volume 2 Photomontage Booklet accompanying this chapter.

In relation to cumulative landscape and visual effects, existing, permitted and proposed wind turbines within 25km of the subject site are listed in Table 14-21. It is noted that 3 no. permitted, proposed and existing windfarms are identified within 5 to 10 km of the subject site, two of which include 1 no. and 2 no. turbines, and a total 30 existing turbines within 10 to 15 km of the subject site. The locations of these turbines are shown in Figure 14-17 from the EIAR, see below.

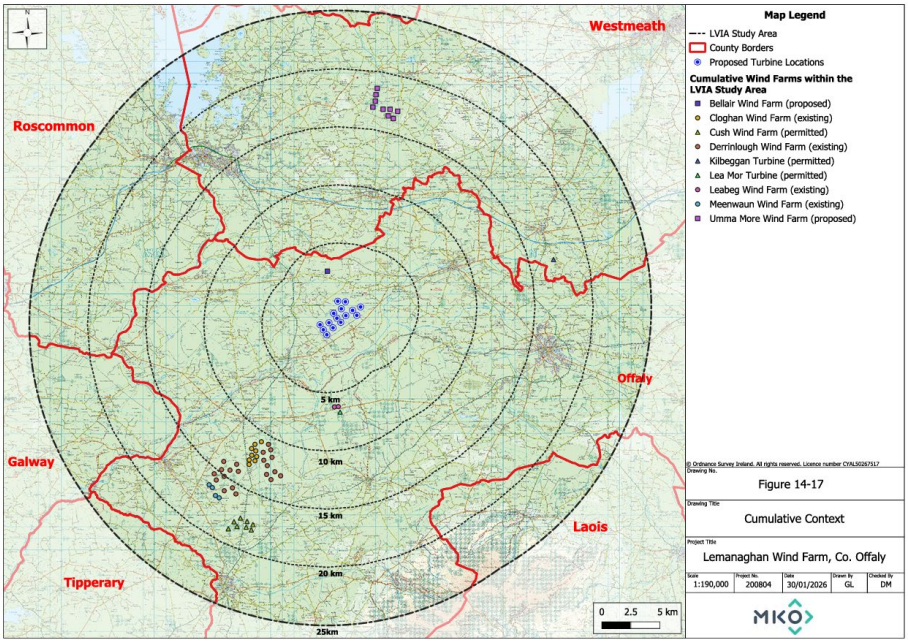


Figure 21: Cumulative Context Map (Source: Figure 14-17 of EIAR)

In relation to Likely Significant Landscape and Visual Effects, Section 14.7.2.2 outlines the likely effects and associated mitigation measures in relation to the construction phase of the proposed development stating that;

- Effects arising from the proposed construction of turbine activities, such as building tower sections and erection of the proposed turbines, will cause 'Moderate', 'Short-Term' and 'Negative' visual effects. A small number of residential receptors in the townland of Cooldorragh will experience 'Moderate' visual effects during the construction phase due to their location on a slightly elevated vantage point to the north-east of the site where they will have views across the bog and construction activities. On balance, these effects are not considered significant.
- The visual effects arising from construction of the access roads and hardstand areas are considered to be localised, 'Negative', 'Short-Term', and 'Slight'. On balance, these effects are not considered significant.
- The magnitude of change visually and to the landscape from the proposed burrow pits are deemed to be a 'Slight', 'Short-term' 'Negative' landscape effect on account that the direct effects will be localised within the bog itself and having regard to screening provided by dense vegetation within the site. On balance, these effects are not considered significant.
- The construction of the proposed anemometry mast is considered to be localised 'Negative,' 'Short-Term', 'Slight' effects. On balance, this is not considered significant.
- The visual effects of the construction of the 5 no. temporary construction compounds are considered to be of localised 'Negative,' 'Short-Term', 'Slight' effects. On balance, these effects are not considered to be significant.
- The visual effects in relation to the construction of the proposed 220kV substation, telecommunications tower and grid connection are considered to be highly localised 'Negative,' 'Short-Term', 'Slight' effects. On balance, these effects are not considered significant.
- The earthworks and surfacing of amenity pathways with granular material are considered to be of highly localised 'Negative,' 'Short-Term' 'Imperceptible' effect. On balance, these effects are not considered significant.

Section 14.7.3 outlines the likely landscape and visual effects in relation to the operational phase of the proposed development stating that;

- The proposed turbines will have a 'Long-term', 'Negative', 'Moderate' residual effect on the landscape of the proposed project site. On balance, these effects are not considered significant.
- In relation to effects on Designated Landscape Receptors of Areas of High Amenity;
    - The magnitude of change on this landscape receptor is therefore 'Slight', and an overall residual visual effect of 'Long-term', 'Negative' 'Not Significant' is deemed to arise in relation to the Grand Canal. On balance, these effects are not considered significant. Reference is also made to the Canal already featuring views of existing wind energy developments along its extent, including the existing Cloghan and Derrinlough Wind Farms, located approx. 4km from the Grand Canal Way at their closest point.
    - the proposed turbines will not materially alter the key characteristics of the landscape, nor detract from the overall amenity value of the Lough Boora Discovery Park. Overall, the residual landscape effect on this AHA is deemed to be 'Long-term', 'Negative' and 'Slight'. On balance, these effects are not considered significant.
    - Overall, 'Long-Term', 'Negative', 'Slight' residual effects on landscape character are deemed to arise in relation to Clara Bog AHA. On balance, these effects are not considered significant.

- 'Long-Term', 'Negative' 'Not Significant' residual landscape effect are deemed likely for the River Shannon and Callows AHA. On balance, these effects are not considered significant.
- Given the setback distance of 23km, overall residual effects on the character of the Slieve Bloom Mountains is 'Long Term', 'Negative' and 'Not Significant'. On balance, these effects are not considered significant.
- Given the nature of the views from the Clonmacnoise Heritage Zone, the separation distance, and the scale of visibility, the magnitude of change is deemed 'Slight' on this AHA, resulting in an overall residual landscape effect of 'Long-Term', 'Negative', and 'Slight'. On balance, these effects are not considered significant.
- An overall 'Long-Term', 'Negative', 'Imperceptible' residual landscape effect is deemed to arise on the Durrow Monastic site and Demesne. On balance, these effects are not considered significant.

It is noted that Section 14.7.3.1.4 'Effects on Local Landscape Receptors' states in relation to Lemanaghan that; *"Given the setback of 1.2km at its closest point, the proposed turbines will not alter the physical fabric of the cultural heritage features within the Lemanaghan Monastic Complex, including the church ruins and grave markers within the monastic site, and the ruins at the Lemanaghan Hermitage. As such, the proposed turbines will not materially affect the landscape of the Monastic Complex".* Reference is made to the grove of trees enclosing the Hermitage providing partial visual screening of the proposed turbines mitigating impacts on the immediate setting and reducing the horizontal extent of visible turbines in views from within the site. The magnitude of change is therefore deemed to be 'Slight'. Overall, residual effects on the landscape setting of the Hermitage are deemed to be 'Long-Term', 'Negative' and 'Slight'.

As regards cumulative landscape effects, the point is made in Section 14.7.3.1.6 that the wider landscape already consists of a number of existing, permitted and proposed wind energy developments (particularly to the south), which contribute to the overall cumulative baseline within the LVIA Study Area. It is stated;
"The proposed turbines do add to the cumulative number of turbines within the landscape. However, due to the large setback distance between the proposed and cumulative turbines, where in combination or in succession views of the proposed turbines do occur, the turbines will appear as small-scale elements in the distant background. This is in line with the DoEHLG 2006 Guidelines and the Draft DoHPLG 2019 Guidelines for peatland landscape types, which state that "more than one wind energy development might be acceptable in the distant background provided it was only faintly visible under normal atmospheric conditions."

Section 14.7.3.2 discusses the visual effects during the Operational Phase from 20 no. photomontage viewpoint locations shown in EIAR Volume 2: Photomontage Booklet, the locations shown in Figure 14-19, see below. The locations included are Designated Scenic Routes and Views Settlements Recreational Routes (Waymarked Walking Routes; Cycle Routes; Scenic Drives; Tourist Routes) Recreational, Cultural Heritage and Tourist Destination Transport Routes.
The visual effect of the proposed development was assessed from each viewpoint in terms of the sensitivity of the visual receptors, along with the magnitude of change. It is noted from Table 14-23 'Summary of Viewpoint Impact Assessment Results' shows the significance of the residual visual effect was not considered to be Profound or Very Significant at any of the 20 viewpoint locations. The residual effects were found to be Significant (1), Moderate (8), Slight (8), Not Significant (2) and Imperceptible (1).

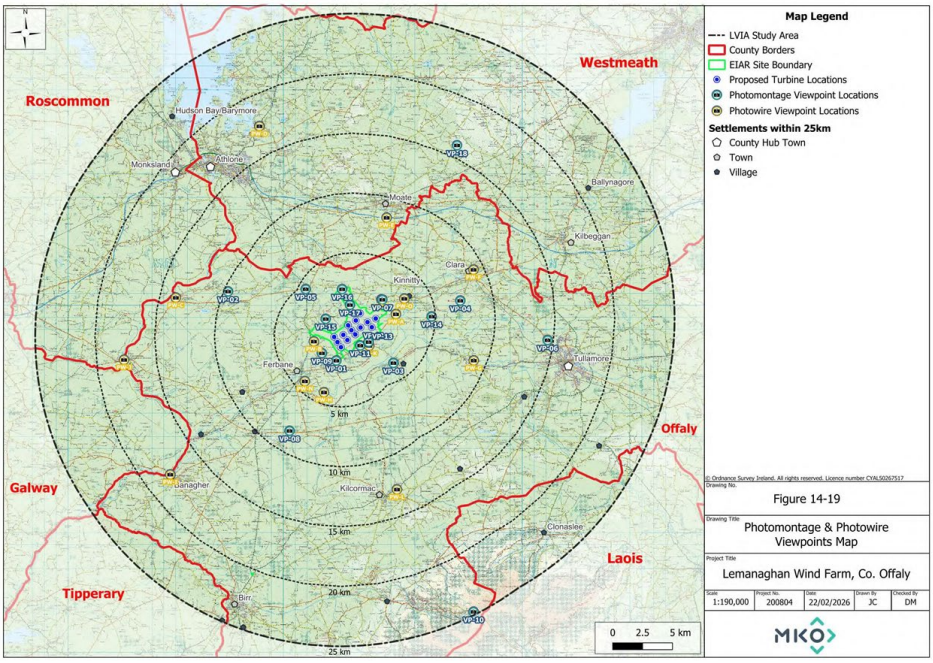


Figure 22: Photomontage and Photowire Viewpoints Map

It is noted that Section 14.7.3.2.3 includes a discussion of the Visibility and Visual Effects on Specific Receptors in the LVIA Study Area.

In relation to residential receptors, Figure 14-24 in Section 14.7.3.2.4 shows the location of 12 photomontage viewpoints which were taken within 5km of the proposed turbines to represent the residential receptors in close proximity to the Proposed Project site, along with 6 no. photowire viewpoints, which were not ultimately brought forward as photomontages due to lesser visibility.

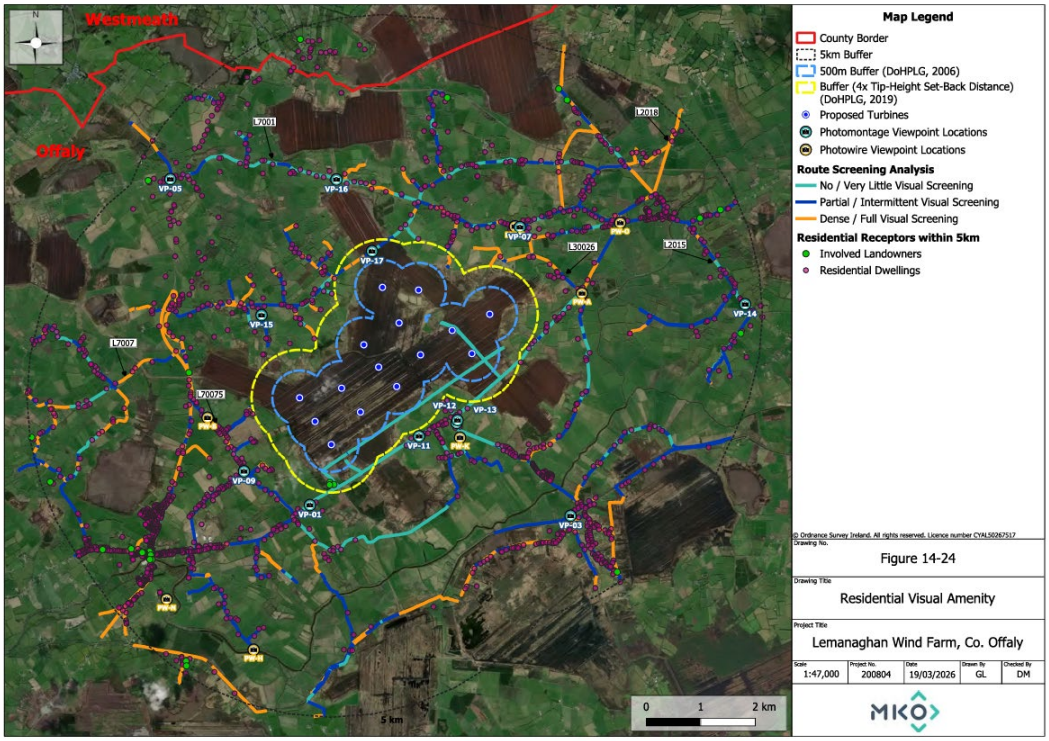


Figure 23: Residential Visual Amenity Map (Source: Figure 14-24 of EIAR)

It is noted in relation to residential properties that;

- to the west of the proposed project site, 'Moderate' magnitude of change was deemed to arise at VP09 and VP01 with an overall 'Moderate' residual effect which were on balance not considered to be significant;
- to the south of the proposed project site, a residual 'Significant' effect occurred at 1 no. viewpoint location (VP11) as a relatively large horizontal extent of turbines is visible to both the west and east of this viewpoint. It is stated that a notable reduction in visibility occurred at VP 12 compared to VP11 due to the disproportionate screening effects that occur in the very flat landscape. While the turbines still occupy a relatively broad horizontal extent, they appear visually set back, with a reduced level of visual exposure due to increased screening from intervening vegetation and built form.
- to the east of the site, a 'Slight' magnitude of change was deemed to arise at VP07 with an overall 'Slight' residual effect. On balance, this is not considered to be significant.
- To the north, at VP-18, a residual 'Moderate' visual effect was deemed to occur for this viewpoint, where the proposed turbines and the grid infrastructure are clearly visible from an elevated vantage point, but appropriately set back and read coherently within the expansive cutover peatland landscape. On balance, this is not considered to be significant. (Note VP-18 not shown on aerial photo)

Comments:

1. Historic monastic sites are typically characterised by low lying, simple built forms, carefully integrated into their rural, natural surroundings, often selected for their sense of isolation, tranquillity, and visual coherence. In this context, large scale wind turbines—by reason of their height, vertical emphasis, and moving blades—are visually dominant elements that introduce a discordant scale and form. Their presence can overwhelm historic features, interrupt key views and sightlines, and fundamentally alter the visual balance of the landscape that contributes to the site's significance. The rotational movement and reflective materials of turbines further exacerbate this impact, drawing the eye and creating continual visual distraction within what is traditionally a contemplative and static setting.
   Given the permanent or long term nature of wind energy infrastructure, such impacts are often enduring and, in practical terms, irreversible for the lifetime of the development. In cumulative terms, the repeated introduction of vertical, modern structures within the wider historic landscape can progressively dilute its coherence and integrity.
   It is apparent in the key Lemanaghan Monastic landscape that the proposed turbines would be clearly visible and would introduce a degree of vertical emphasis that alters the character of the historic setting. While this effect is assessed within the EIAR as not resulting in significant landscape effects, from a conservation perspective the sensitivity of the receptor and the concentration of turbines within specific quadrants of the scheme remain a concern.
   Accordingly, while Chapter 14 of the EIAR provides a thorough and technically sound visual assessment, it is considered that greater weight should be afforded to experiential and setting based impacts, particularly where historic places derive significance from isolation, openness and long-established views across the landscape. The Planning Authority therefore requests that the ***overall project be completely reappraised in relation to its layout and that any revised proposal would ensure the removal of turbine numbers 5, 9, 10, 11, 12, 13, 14 and 15*** to meaningfully address the constraints of its historic landscape and to comply with the proper planning and sustainable development of the area. This includes the heritage and archaeological setting of Lemanaghan, Bellair and Castle Armstrong/Pilgrim's 'axis'.

Viewpoint 13: Lemanaghan Monastic Site from Photomontage Booklet in Volume 2 of the EIAR.

2.

(a) The Planning Authority strongly disagrees with the evaluation of the visual and landscape impact experienced by VP 18 as being 'Moderate' and 'on the balance not significant' having regard to the topography and contours of the public road and dwellings to the south of the subject site and the combination effect of the large substation building combined with the density of turbines to the south as shown below in image from the Photomontage Booklet in Volume 2 of the EIAR.

Viewpoint 18: Cooldorragh

(b) The Planning Authority strongly disagrees with the evaluation of the visual and landscape impact experienced by VP 1 and VP 9 as being 'Moderate' and 'on the balance not significant' having regard to the proximity, orientation and exposure of a number dwellings to the south west of the subject site and a total number of 14 and 15 turbines respectively, as shown below images from the Photomontage Booklet in Volume 2 of the EIAR.

Viewpoint 09: Ballylin from Photomontage Booklet in Volume 2 of the EIAR.

Viewpoint 01: Ballydaly from Photomontage Booklet in Volume 2 of the EIAR.

3. The Planning Authority would raise significant concerns with the following extract from this report: "*There is value to the historic and cultural landscape of the site and setting, however it is a highly modified and degraded landscape from historic peat harvesting. The susceptibility of the landscape of the site to the proposed change of wind energy development is 'Low' considering local planning policy indicating the suitability of degraded cutover peatlands for wind energy development in County Offaly.*" Local policy designates the area as "open to consideration" for wind energy, but subject to other considerations per the many other relevant policies and objectives of the plan which are also applicable and required to form part of the assessment of this SID application. The Planning Authority would refer to the strong concept of 'reasonable balance' as required by Objective CAEO-03 and as directly espoused by the current Wind Energy Guidelines.

Chapter 15: Material Assets

It is noted from Section 15.1.2.1 that the operational phase will utilise 4 no. site entrance locations to facilitate maintenance and monitoring activity and amenity access. Of the 4 no. locations, 3 no. are the same as the identified construction phase entrances and 1 no. is a new site entrance that will facilitate amenity access only.

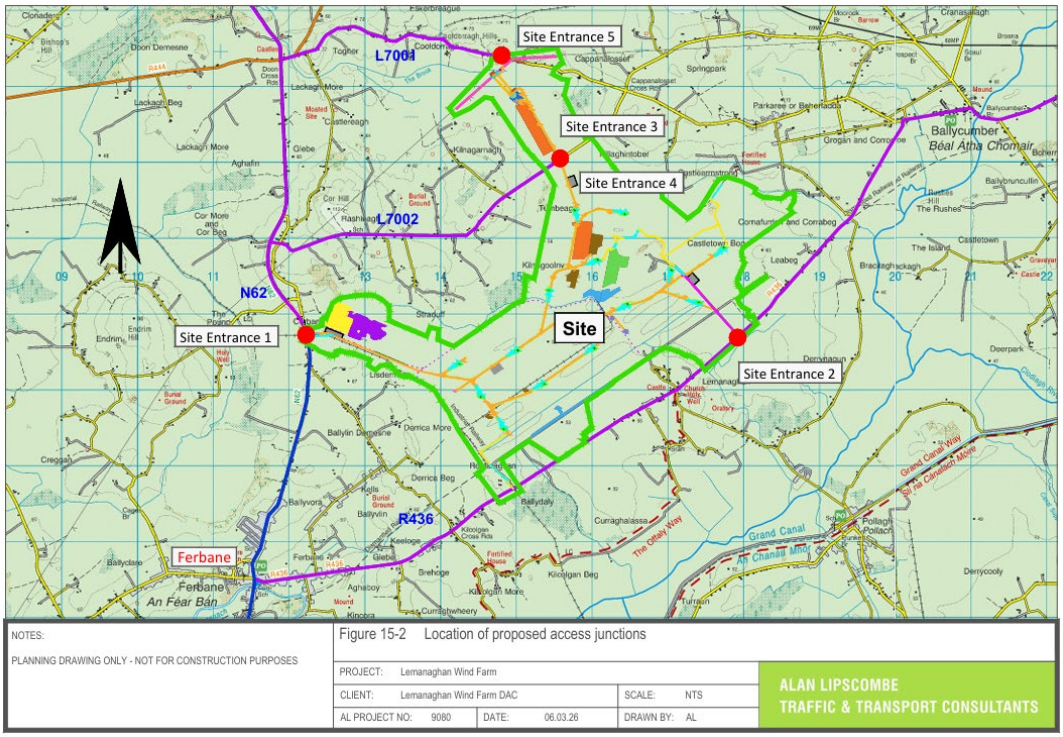


Figure 24: Location of proposed access junctions (Source: Figure 15-2 of EIAR)

Section 15.1.2.3 outlines the Turbine Delivery Route (TDR) for the abnormally sized loads transporting the large turbine components. Turbine infrastructure being imported to Galway Port will be delivered to site via north from the Galway Port through Galway City via the Lough Atalia Road, the R339 Wellpark Road, northwest onto the R336 Tuam Road, before turning west onto the N6 National Road for approximately 3.7km where the N6 joins the M6. The transport vehicles will merge onto the M6 and head east towards to the Proposed Wind Farm. It is proposed that the large wind turbine plant will be delivered via the M6 before turning south onto the N52 at Junction 5 (Tullamore/Kilbeggan). The route follows the N52 south, bypassing Tullamore to the east and passing through the settlements of Blue Ball, Kilcormac and Five Alley. Deliveries will turn right onto the N62 (at the junction known as Kennedy's Cross) and will proceed northwards towards Ferbane for approximately 22km to Site Entrance 1 on the N62. The abnormal loads will be delivered in convoys of 3 vehicles over 40 separate nights, with each convoy accompanied by a Garda escort.
It is stated in this section also that the turbine delivery route follows a similar route to that of the existing Derrinlough Wind Farm (Pl Ref. PA19.306706), which has had a successful delivery of abnormal loads for a similar blade length (73.7m delivered while 76m blade length tested as part of this EIAR).

Section 15.1.4.1 outlines that the construction phase of the proposed development is estimated to take approximately 24 to 30 months

Stage 1 – Site preparation and groundwork – Concrete foundation pouring	= 15 days
Stage 1 – Site preparation and groundwork – All other days	= 440 days
Stage 2 – Turbine construction – Delivery of abnormally sized loads	= 40 days
Stage 2 – Turbine construction – Delivery of other turbine components	= 15 days

Section 15.1.5 details that the types of vehicles that will be required to negotiate the local network will be up to 80 metres long and will carry a blade 76 metres in length.

Section 15.1.6.2 provides an assessment of the impact on link capacity on all delivery routes (TDR and proposed construction haul routes) for the various construction stages and considers that the magnitude of impacts arising from construction traffic generated by the Proposed Project will be slight with respect to link capacity.

It is noted in Section 15.1.8 that a Traffic Management Plan, contained in Appendix 15-2, has been prepared for the proposed development.

As part of their Abnormal Load Route Assessment, a swept path assessment was undertaken in order to establish the locations where the wind turbine transporter vehicles will be accommodated, and the locations where some form of remedial measure may be required.

Section 15.1.11 refers to 3 no. potential problems identified in the Stage 1 Road Safety Audit Report attached in Appendix 15-4, for which the Audit Team provided a detailed solution describing each mitigation measure proposed.

Section 15.1.1.14 outlines the following traffic effects during construction, operation and decommissioning;

- For 15 days when concrete is delivered to the Proposed Wind Farm for the construction of the turbine foundations via the identified construction delivery routes, an additional 454 Passenger Car Units (PCUs) will travel to and from the site. During these days it is forecast that the increase in traffic volumes will range from between +2.5% to +9.2% on the N52 between the M6 and the junction with the N62. For the section of the N62 travelling north from Ferbane toward Site Entrance 1 it is forecast that the construction traffic will result in a 5.0% to 5.1% increase in traffic volumes, and for the R436 heading east from Ferbane towards Site Entrance 2 it is forecast that the additional traffic will result in an 11.1% increase on these 15 days. It is forecast that this will have a temporary, slight, negative effect, which is Not Significant, on existing traffic on the construction haul route and at the access junctions on the N62 and R436.
- During the 440 days during which the main element of the construction phase of the Proposed Project will occur, an additional 646 PCUs will travel to and from the site via the identified construction haul routes. On these days it is forecast that the increase in traffic volumes will range from between +3.6% to +13.1% on the N52 between the M6 and the junction with the N62. On the section of the N62 travelling north from Ferbane toward Site Entrance 1 it is forecast that there will be a maximum +7.3% increase in traffic volumes, and for the R436 heading east from Ferbane towards Site Entrance 2 it is forecast that there will be a +15.8% increase on these 440 days. During this period, it is forecast that the additional traffic generated by the Proposed Project will have a temporary, slight, negative effect, which is Not Significant, on existing traffic on the construction haul route and at the access junctions on the N62 and R436.
- On the 40 days during which a convoy of 3 abnormally sized loads accompanied by an escort provided by An Garda Síochána travel to the site and access via Site Entrance 1 on the N62 it is forecast that the increase in traffic volumes will range from between +0.6% to +2.1% on the N52 between the M6 and the junction with the N62. On the section of the N62 travelling north from Ferbane toward Site Entrance 1 it is forecast that there will be a 1.2% increase in traffic volumes. It is forecast that this will have a temporary, slight, negative effect, which is Not Significant, on existing traffic on the delivery route and at the access junction on the N62.
- For 15 days when smaller turbine components will be delivered to the site by standard HGVs an additional 64 PCUs will travel to and from the site via the identified construction haul

routes. On these days it is forecast that the increase in traffic volumes will range from between +0.4% to +1.3% on the N52 between the M6 and the junction with the N62. On the section of the N62 travelling north from Ferbane toward Site Entrance 1 it is forecast that there will be a 0.7% increase in traffic volumes, and for the R436 heading east from Ferbane towards Site Entrance 2 it is forecast that there will be a 1.6% increase on these 440 days. It is forecast that this will have a temporary, slight, negative effect, which is Not Significant, on existing traffic on the delivery route and at the proposed access junctions.

Section 15.1.14.5 summarises mitigation measures referring to the principle of mitigation by design along with detailing procedures in relation to the delivery of abnormal sized loads after peak evening traffic and the implementation of a range of measures contained within a Traffic Management Plan to be included in the CEMP. It is also stated that in the event that the proposed development is decommissioned after the 35 years of operation, a decommissioning plan, will be prepared for agreement with the local authority.

Section 15.1.1.15 of the EIAR addresses cumulative effects. In relation to other windfarms, one permitted and one awaiting decision are included in Table 15-27, see below. It is stated in this regard that; *"In the event that the construction of the Proposed Project coincides with the construction phase of either of the 2 wind farms listed in Table 15-27, the traffic related cumulative impacts would be negative, short-term and slight, based on the potential overlap of TDRs and associated traffic generation. It is therefore proposed that the construction phase of the Proposed Project will be scheduled, where possible, to avoid the overlap of the construction phases of these wind farm developments. This will ensure that the potential for cumulative effects is minimised."*

Project	Status	Degree of overlap of highway network (low / medium / high)	Traffic volumes (low / medium / high)	Potential cumulative traffic effects*
1 – Cush Wind Farm (8 turbines) - ACP Reference PA19.318816	Granted	High	Medium	High
2 – Umma More Wind Farm (9 turbines) - ACP Reference PA25M.321595	With ACP	Low	Medium	Low

Figure 25: Summary of other wind farms considered in cumulative assessment and potential for cumulative traffic effects with Proposed Project (Source: Table 15-27 of EIAR)

A total of 22 no. other developments within a 10 km buffer of the site are summarised in Table 15-28 that have the potential for cumulative impacts based on the criteria set out above (project status, overlap of delivery routes and traffic volumes). The authors state that there are;

- 2 developments (a new 110kV substation and underground cabling works associated with Upperchurch Wind Farm, and amendments to an electrical substation located at Graniera, Shevry, Co Tipperary) where it is considered that the potential for cumulative impacts is high;
- 10 where the potential for cumulative impacts is considered medium; and
- 12 development considered to have a low risk of cumulative impacts.

It is stated in this regard that; *"For all developments listed, in the event that they are constructed at the same time as the Proposed Project it is forecast that the cumulative impacts will be negative, short term and slight, and not significant."*

It is noted that Section 15.2.5 outlines that a Telecommunications Impact Assessment was carried out for the proposed development which is included in Appendix 15-6, which concludes that the proposed turbines will have no impacts on telecommunications.
It is noted that;

- There are no airports or aerodromes located within or adjacent to the site. The nearest operational aviation facility is Ballyboy Airfield located approx. 14.5 km south of the Proposed Wind Farm. The next closest facility is Birr Aerodrome located approx. 20.5 km southwest of the Proposed Wind Farm. There are no flying clubs in close proximity of the Proposed Project, with the nearest being the Irish Jet Modellers Flying Club, located c. 8.9 km southwest of the proposed turbine T03. Manna Air Delivery, a drone operator, conducts test flights at Bellair Bog, which is located c. 1 km north of the proposed onsite 220kV substation and 2.6km north of the nearest proposed turbine (i.e., T10).
- Consultation regarding the potential for electromagnetic interference and impact on aviation from the proposed development was carried out which confirmed that no proposed turbines are proposed within the areas requested to be left clear of turbines. Therefore, no impacts were identified to telecommunications or aviation from the proposed development.
- There are no electromagnetic interference impacts for telecommunications and aviation assets or operations associated with the construction phase of the Proposed Wind Farm or Proposed Grid Connection and therefore no mitigation is required. The potential for electromagnetic interference from proposed turbines may only occur during the operational phase of the Proposed Project. It is stated that a standard Protocol Document has been prepared which will be signed by the developer prior to construction.

In relation to other material assets, such as existing built services and utilities, Section 15.3.5 outlines that there will be no operational phase impacts or associated effects on built services or waste management associated with the proposed project. The proposed project will have an estimated installed capacity of 90MW which has potential to produce 275,940MWh of electricity. This would be sufficient to supply approximately 65,700 Irish households with electricity per year during its operational phase. The Proposed Project will therefore have a positive, moderate, long-term effect on built services.
It is stated in Section 15.3.5.2.1 that in advance of works relating to the proposed grid connection break of the existing overhead line, comprehensive consultation and coordination will be carried out with EirGrid/ESB to ensure appropriate outage planning, network management, and contingency arrangements are implemented, to minimise any potential impact on local residents, businesses, and critical services. No other electricity infrastructure is present within the subject site.

Comments:
Please refer to internal report of the Birr MD and Roads Section.

Chapter 16: Major Accidents and Natural Disasters

This chapter describes the likely significant adverse effects on the environment arising from the vulnerability of the Proposed Project as detailed in Chapter 4 to risks of major accidents and/or natural disasters, as well as the potential of the proposed development itself to cause potential major accidents and/or natural disasters.
Section 16.3.3 outlines the following baseline risks; flooding, major road traffic accident, contamination event, major fire, bog fire, civil disorder at large events, adverse weather conditions, loss of critical infrastructure and peat stability.

The scenarios identified by the authors with the highest risk score in terms of a major accident and/or natural disaster during the construction, operation and decommissioning phase of the proposed development are as follows;

- Contamination Events During Construction, Operation and Decommissioning
- Major Fire During Construction, Operation and Decommissioning.

It is stated in Section 16.4.3 in relation to mitigation measures that;

- the proposed project will be designed and built in line with current best practice and, as such, mitigation against the risk of major accidents and/or disasters will be embedded through the design;
- a Risk Management Plan (RMP) will be prepared and implemented on site to ensure an effective response to disasters or the risk of accidents. The RMP will include sufficient preparedness and emergency planning measures.

In addition, it is stated in Section 16.4.3.1 that a CEMP has been prepared and is included in Appendix 4-4 of this EIAR. It is noted that a Major Accidents and Natural Disaster Risk Assessment forms the basis of the Emergency Response Plan (ERP) which is contained within the CEMP.
Section 16.4.6 states that following a detailed assessment of the potential for any further impact when considered in combination with any or all of the plans and projects set out in Chapter 2: Background to the Proposed Project, with mitigation measures in place, it was found that there was no potential for significant in-combination or cumulative increase in the vulnerability of the proposed project or adjacent areas to major accidents and/or natural disasters.

Chapter 17: Interaction of the Foregoing

This chapter identifies the interactions of the potential significant environmental effects that may occur in terms of population and human health, biodiversity, birds, land, soils and geology, water, air quality, climate, noise and vibration, cultural heritage, landscape and visual, material assets and major accidents and natural disasters, as a result of the proposed project.
A matrix is presented in Chapter 17 of the EIAR to identify interactions between the various aspects of the environment already discussed in the EIAR. The matrix highlights the occurrence of potential positive or negative impacts during the construction, operational and decommissioning phases of the proposed development.
Effects arising from the identified interactions are concluded Not Significant, with the exception of 1 no. location (VP11) resulting in a Significant interaction between Population and Human Health and Landscape and Visual. Section 17.2.1 states in relation to VP11; "1 no. viewpoint, VP11 view from the R436 Regional Road, located 998 metres southeast of T5 was found to have Significant residual visual effects. This view is representative of residential receptors with open views towards the site in close proximity (within <1 km from the site).

Chapter 18: Schedule of Mitigation and Monitoring Measures

This chapter in Table 18-1 outlines all mitigation and monitoring measures relating to the pre-commencement, construction, operational and decommissioning phases of the Proposed Project are set out in the relevant chapters of the EIAR.
It should noted that it is stated that the CEMP will be updated where required prior to the commencement of construction to include all mitigation and monitoring measures, planning conditions and/or alternative monitoring and mitigation measures should they emerge during the course of the planning process and would be submitted to the Planning Authority for written approval prior to the commencement of development.

10 REPORTS OF RELEVANT LOCAL AUTHORITY DEPARTMENTS

Birr Municipal District

Report, dated 01 May 2026, has no objections to the proposed development subject to conditions relating to;

- Section 1 - Planning Conditions recommended relating to visibility and sightlines, surface water and ground water, wheel wash, pre-construction surfacing of site access lanes, post construction resurfacing of site entrances on public roads, keeping roads free of loose materials, dust, mud, spillages, and debris, road opening licence, traffic management plan, implementation of the Road Safety Audit and use of National Secondary and Regional road network for HGV deliveries.
- Section 2 - Planning Conditions with respect to haulage routes**.**
- Section 3 - Planning Conditions with respect to special financial contribution in relation to light-duty road maintenance by Municipal Districts.
- Section 4 - Planning Conditions with respect to Road Condition Survey along with major road deterioration and full-width restoration.
- Section 5 - Planning Conditions with respect to a bond for haulage routes.

Environment and Water Services

Report dated 30 April 2026, with a follow-on report dated 08 May 2026 - No objections subject to conditions relating to;

- Implementation of mitigation measures outlined in Water Supply Disruption Mitigation Plan (WSDMP), Construction and Environmental Management Plan, Flood Risk Assessment, Natura Impact Statement and Environmental Impact Assessment Report (EIAR).
- Monitoring of raw water quality and borehole water levels in relation to Boher Lemanaghan GWS.
- Waste Management – storage and importation;
- Environmental Nuisance – noise and dust;
- Biodiversity & Landscape.

Conservation & Heritage Section

Conservation and Heritage, report, dated April 30th, raise a number of matters which require consideration as follows;

- From an architectural conservation perspective, greater weight should be afforded to the scale, proximity and cumulative visual presence of the proposed turbines and to the manner in which they would affect the setting, perception and experiential appreciation of key heritage assets. This is particularly relevant in relation to the Lemanaghan Monastic Site, where turbines are located at distances considered unacceptably close from a conservation standpoint, resulting in sustained and overbearing visual impacts that diminish the openness, archaeological legibility and landmark qualities of this nationally significant monastic landscape.
- It is further noted that Bellair House and Bellair Hill, despite their relative proximity to the Proposed Project and their elevated vantage point, have not been adequately assessed within the EIAR. The absence of verified photomontages from Bellair Hill represents a notable gap in the assessment, and additional visual material is required to allow a complete and balanced understanding of potential impacts on the setting of this Protected Structure. Having regard

to the significant adverse impacts on the archaeological, cultural, and landscape context of the monastic complex at Lemanaghan, and on the setting, character, and visual amenity of Bellair Hill and House, the five turbines proposed within the northeastern quadrant of the site are unacceptable and should be excluded from the proposed development.

- The proposed development is situated in close proximity to established dwellings and to a number of Protected Structures. The combined effects of daytime visual change, night-time aviation lighting and operational noise have the potential to influence the setting, character and lived experience of nearby heritage assets and historic places. These indirect and cumulative effects warrant explicit acknowledgement within the overall conservation assessment.
- In addition, the Proposed Project site contains an exceptionally high density of Recorded Monuments (SMR). While mitigation measures are proposed, the scale of development necessitates particular caution in relation to access roads, construction compounds and ground disturbance. A robust, precautionary and continuously monitored archaeological management strategy is essential across all project phases for any approved turbines. As presence can overwhelm historic features, interrupt key views and sightlines, and fundamentally alter the visual balance of the landscape that contributes to the site's significance -a considerable reduction in the number of turbines should be agreed.
- Having regard to the cumulative concentration of wind energy development within the wider Midlands and the sensitive heritage environment surrounding Birr, it is considered that the current layout and scale of the proposal would benefit from further refinement. This may include a reduction in turbine numbers, increased separation distances from significant heritage assets and residential areas, and a more strategic consideration of cumulative landscape capacity.

Heritage Officer, report dated April 27th, 2026, makes the following comments;

- Disagrees with the low/medium evaluation of the subject site within Table 14.9 of the EIAR;
- states in relation to wind farm amenity map that there is a very short orange line showing 'existing historical pathway'. The Lemanaghan Conservation Plan shows a route agreed early in the 2000s which went from the Monastic Site, up the lane past the school house, then turning right along the exiting track and towards Derrryane Cottage to Castlearmstrong and on to Boher. This is not reflected in the current map. The green line for the proposed additional amenity link picks up on the last section of this but not linking from the back of the school house;
- Figure 1.1 – Aerial view and geographical context of Lemanaghan monastic complex and the proposed project site does not include the monastic enclosure nor does it show the line of the trackway leading on from The Rectangular Enclosure – knowns as St Mella's Cell OR015-004014).
- Refers to 470 known sightings of archaeological material in the application area.

Biodiversity Officer, report, dated April 29th, 2026, states the following;
Chapter 6 - Biodiversity

- A weak assessment of in-combination and cumulative ecological effects has taken place, particularly in a landscape already heavily altered by historic peat extraction.
- A further concern arises from the reliance on survey-based absences and negative findings, which risks overstating ecological certainty
- Given the central role of the Shannon system as a regional ecological network, the assessment would benefit from a more explicit connectivity-led analysis, recognising that habitats of

"local" value may nonetheless be critical stepping stones or support areas for SAC and SPA features downstream.

Chapter 7 – Birds

- at a regional and local scale, the acknowledged presence of several protected species, even where recorded at low abundance or frequency, including Hen Harrier, Common Crane, Whooper Swan and others (notably breeding Lapwing), elevates the sensitivity of the receiving environment. In this context, the potential in-combination effects of the proposed development, when considered alongside existing, permitted, and planned green energy infrastructure, warrant further scrutiny. Taking Hen Harrier and Common Crane as example.
- the assessment of in-combination effects is constrained by the absence of an up-to-date, publicly available biodiversity strategy for Bord na Móna lands in the West Offaly bog complex and the wider Shannon region, resulting in limited visibility as to the scale, timing and location of future developments and associated biodiversity risks.
- In this context and having regard to emerging obligations under the EU Nature Restoration Law — which is likely to place particular emphasis on State-owned lands delivering habitat restoration to favourable condition — any additional development not directly linked to rehabilitation or ecological restoration should be subject to the highest level of scrutiny.

Road Design

Report, dated 7th May, 2026, refers to the imposition of conditions relating to Construction Management Plan, Road Opening Licence, turbine delivery routes, road surveys, Road Safety Audit, traffic management plans, consultations with service providers and emergency services, landscaping, agreement in relation to culvert construction, potential road closures and provision of a bond.

Please note that the full reports referenced in this section can be viewed in Appendix A to this report

11 THIRD PARTY OBSERVATIONS/SUBMISSION SUBMITTED TO AN COIMISIÚN PLEANÁLA

At the time of writing, the Planning Authority has not received copies of any third-party submissions or referrals made from prescribed bodies, which may have been submitted and received by the Commission.

12 PLANNING AUTHORITY'S ASSESSMENT AND VIEWS

It is an objective of the County Development Plan under CAEO-03 to achieve a reasonable balance between responding to government policy on renewable energy and in enabling the wind energy resources of the county to be harnessed in an environmentally sustainable manner. The PA draw the Coimisiúns attention to Section 3.2.6 of the Development Plan which states that;

> *"Site suitability is an important factor in determining the suitability of wind farms having regard to possible adverse impacts associated with, for example, residential amenities, landscape, including views or prospects, wildlife, habitats, designated sites, protected structures or bird migration paths and compatibility with adjoining land uses. The Council is therefore required to achieve a reasonable balance between responding to overall positive Government policy on renewable energy and enabling the wind energy resources of the Planning Authority's area to be harnessed in a manner that is consistent with proper planning and sustainable development".*

Notwithstanding that the proposed development is located in an area 'Deemed Open for Consideration for Wind Energy Developments' in the County Wind Energy Strategy contained within the Development Plan, it is the view of the PA that the proposed development, by reason of its scale,

height, and proximity to the Lemanaghan Monastic Complex and its associated archaeological landscape, would give rise to significant adverse effects on both the character, setting, and visual integrity of a nationally important early medieval monastic environment and on the wider historical landscape to the north and north east of this site.

The wider Lemanaghan landscape comprises an extensive and highly sensitive archaeological complex, including early Christian ecclesiastical remains, historic trackways, ritual sites, and a uniquely intact wetland setting that forms an essential component of its cultural significance. The introduction of large-scale wind turbines within this landscape as proposed would:

- Diminish key vistas and long-range views that contribute to the understanding and appreciation of the monastic complex
- Interrupt the historic sense of place**,** tranquillity, and visual coherence that define the character of the Lemanaghan heritage landscape
- Undermine the integrity of the archaeology of the site and its wider archaeological setting, which relies on an unaltered bog and open-sky backdrop to convey its early medieval context
- Conflict with County Development Plan Policy BHP-43 to support and promote the protection and appropriate management of all monastic sites in the county.

Having regard to the exceptional sensitivity of the Lemanaghan Monastic Complex and its surrounding historic landscape, the proposed development would represent an incongruous and visually intrusive industrial intervention. It would materially and adversely affect the cultural heritage value of the area and in the absence of a revised layout, which sufficiently addresses the landscape and heritage values attached to this site, would be contrary to the proper planning and sustainable development of the area.

Accordingly, the planning authority is not satisfied that the proposal represents a balanced or proportionate response to to local or national renewable-energy objectives to increase wind energy generation. Due consideration collectively, to locally adopted policies, objectives and standards within the CDP (as relevant), along with Ministerial Guidelines, CAP and other standard planning criteria is required to ensure a reasoned assessment of the proposed development. In this context, it is considered that the proposed SID requires a comprehensive reappraisal, including in particular, a substantial reduction in the number of turbines, in order to appropriately address and integrate any future development with the historic landscape attached to this site and its surrounding area, in the interest of proper planning and sustainable development of the area.

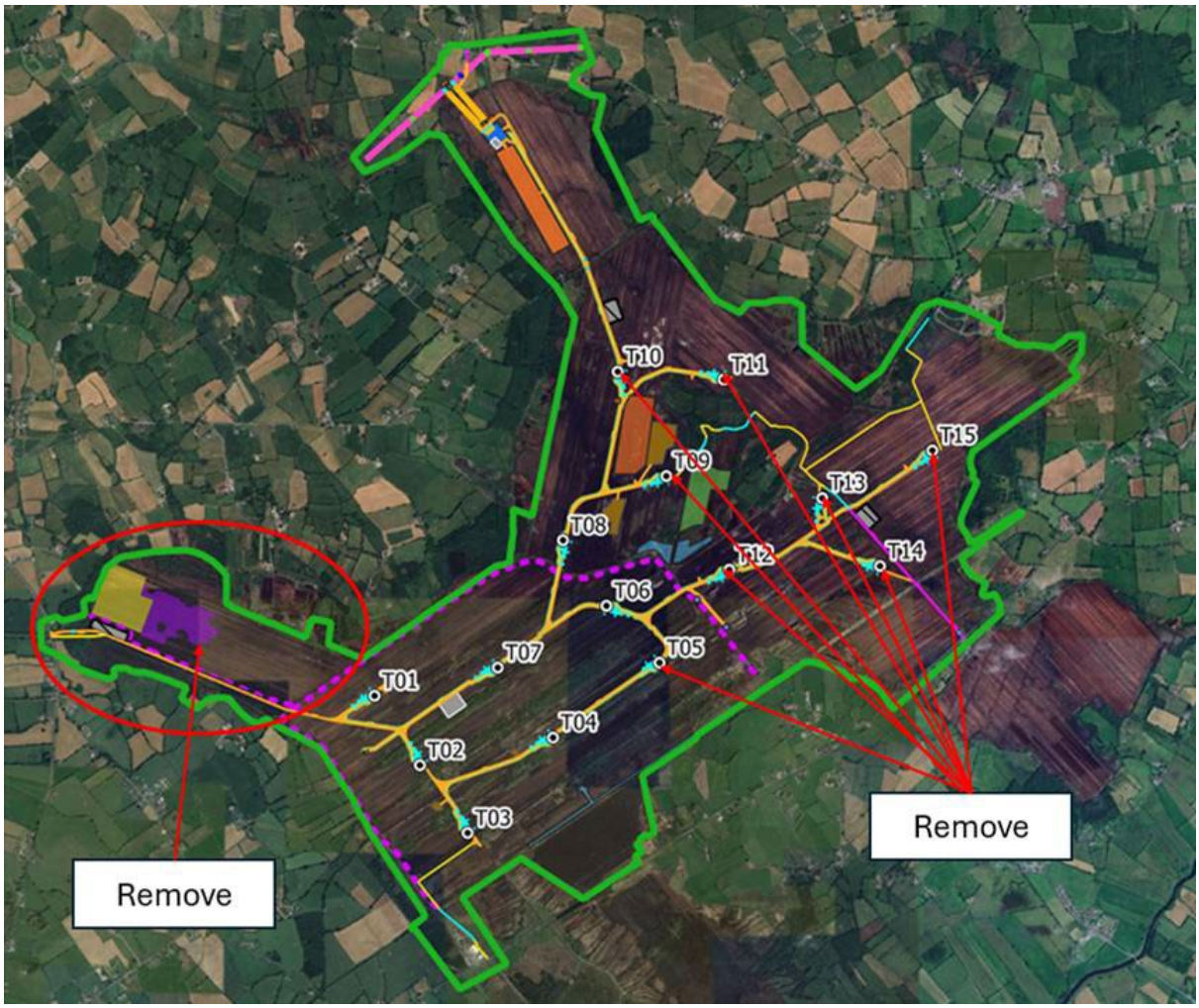
As highlighted, the PA has several planning concerns in relation to the proposed development at the subject lands. It is therefore respectfully requested that the Commission have regard to the following matters:

1. Need for a Comprehensive Reappraisal of the Project at this Location

The applicant is requested to submit a comprehensive reappraisal of the project and include the following;

a) Omission of 8(no) turbines notably T5,T9, T10, T11, T12, T13, T14 and T15 as shown on Drawing No. Figure 4-1 in the in Chapter 4 of the EIAR; and
b) Submit a Revised Site Layout for any subsequent proposal, ensuring that internal roads and site access arrangements are not located at or within the western ' spur' of the site to the N62 (as shown below), due to the substantial archaeological sensitivities of the site at this location

(including a high number of recorded monuments, a Class 1 Togher, Class 2 Toghers and Class 3 Toghers).



An Coimisiún Pleanála are requested to take into account the following observations from the Local Authority in addition to point 1 above;

2. Landscape and Visual Assessment

(a) The Planning Authority strongly disagrees with the evaluation of the visual and landscape impact experienced by VP 18 as being 'Moderate' and 'on the balance not significant' having regard to the topography and contours of the public road and dwellings to the south of the subject site and the combination effect of proposed large substation building, combined with the density of turbines to the south as shown below in image from the Photomontage Booklet in Volume 2 of the EIAR.

Viewpoint 18: Cooldorragh

(b) The Planning Authority strongly disagrees with the evaluation of the visual and landscape impact experienced by VP 1 and VP 9 as being 'Moderate' and 'on the balance not significant' having regard to the proximity, orientation and exposure of a number dwellings to the south west of the subject site and a total number of 14 and 15 turbines respectively, as shown below images from the Photomontage Booklet in Volume 2 of the EIAR.

Viewpoint 09: Ballylin from Photomontage Booklet in Volume 2 of the EIAR.

Viewpoint 01: Ballydaly from Photomontage Booklet in Volume 2 of the EIAR.

(c) It is submitted that Bellair House and Bellair Hill, despite their relative proximity to the proposed development and their elevated vantage point, have not been adequately assessed within the EIAR. The absence of verified photomontages from Bellair Hill represents a notable gap in the assessment. It is put forward by the Planning Authority

that additional visual material is required to allow a complete and balanced understanding of potential impacts on the setting of this Protected Structure.

2. Biodiversity and Birds

The proposed windfarm development must be considered within the context of a highly sensitive and extensively modified bog and wetland landscape, where historic peat extraction has resulted in significant habitat loss, fragmentation, and degradation. In such a setting, even incremental additional pressures may give rise to disproportionately significant ecological effects. Accordingly, a precautionary, landscape-scale approach is essential.

Particular emphasis must be placed on the protection, restoration and long-term management of peatland habitats, ensuring that hydrological regimes, habitat integrity and ecological functionality are not only maintained but demonstrably enhanced over time. Given the critical role of hydrology in sustaining peat-forming systems, any disruption—direct or indirect—must be rigorously avoided or fully mitigated in line with best practice under the **Environmental Liability Directive, Environmental Impact Assessment (EIA) Directive, and the European Communities (Birds and Natural Habitats) Regulations 2011–2021.**

The development must also explicitly recognise the wider ecological network of the Midlands bog complex, including functional connectivity between cutaway bogs, raised bog remnants, wet grassland, callows, and associated river corridors within the broader Shannon catchment. Habitats of seemingly low intrinsic value may nonetheless function as essential steppingstones, commuting routes, or buffer zones for Annex I habitats and Annex II species, and therefore require careful consideration.

There is a particular need to protect and strengthen bat populations, including roost sites, commuting corridors and foraging areas. The fragmentation of linear landscape features such as hedgerows, drains and treelines, in conjunction with turbine placement, has the potential to create barrier effects and disrupt established bat movement patterns, contrary to the requirements of the Habitats Directive and associated national legislation.

Furthermore, the proposal must fully account for impacts on bird species, with specific regard to both resident and migratory populations. The site and surrounding landscape are known to support a range of sensitive species associated with peatland, wet grassland and upland habitats, including Hen Harrier (Circus cyaneus), Merlin (Falco columbarius), Curlew (Numenius arquata), and Common Crane (Grus grus), alongside wintering and passage species such as Whooper Swan (Cygnus cygnus) and other migratory waterbirds.

Of particular concern are:

- **Barrier effects** arising from turbine arrays, which may alter established flight lines, displace birds from suitable foraging and breeding habitats, and increase energetic costs, particularly for migrating species;

- **Collision risk**, both alone and in-combination with existing and permitted wind energy developments, especially along known migratory routes and within functional ecological corridors;

- **Disturbance and displacement effects**, including the potential abandonment of roosting, nesting or foraging habitats;

- **Loss or degradation of functionally important habitat**, including winter roost sites for Hen Harrier and potential breeding or prospecting habitat for Common Crane.

The repeated use of bog habitats in proximity to the site by Hen Harrier strongly indicates the presence of an established winter roost. Such sites are of high conservation importance and are particularly vulnerable to disturbance, lighting, noise, and operational activity. Their loss or degradation would represent a significant adverse effect on a strictly protected species and must be assessed in accordance with the precautionary principle.

In relation to Common Crane, the assessment must move beyond a narrow interpretation based on current population size and instead incorporate known recolonisation trends, expansion potential, and the presence of non-breeding and prospecting individuals within the wider landscape. Any reliance on speculative future habitat enhancement measures, without secured delivery mechanisms, resourcing, monitoring, and adaptive management, should not be afforded weight in the assessment of likely significant effects.

The applicant must demonstrate full compliance with international best practice in avoiding, reducing and mitigating bird strike risk, including robust collision risk modelling that incorporates cumulative and in-combination scenarios, particularly in light of increasing wind energy development across the Midlands. This is particularly important given the evolving landscape context and the likelihood of increased pressure on migratory corridors.

In addition, a comprehensive, enforceable, and adequately resourced long-term monitoring and adaptive management programme must be provided, covering the full operational lifetime of development. This should include triggers for corrective action where unforeseen impacts arise, in line with best practice under IPC (Integrated Pollution Control) licensing conditions and EPA guidance where applicable.

Crucially, the assessment must robustly address in-combination and cumulative effects, taking into account existing, permitted, and proposed wind energy developments; ongoing peatland rehabilitation and restoration initiatives; agricultural intensification and land-use change; and historic habitat loss and fragmentation across the bog complex.

The current approach, which largely treats impacts in isolation and at a project-specific scale, fails to adequately capture the cumulative erosion of ecological resilience within the wider system. In a landscape where intact raised bogs have been reduced to small remnants, the incremental loss of marginal habitats, ecological corridors, and buffer zones may significantly undermine long-term restoration objectives.

Furthermore, the absence of a coordinated, strategic masterplan for the Bord Na Móna Offaly and adjoining bog and wetland complexes significantly constrains the ability to assess long-term cumulative ecological effects in a meaningful way. This lack of strategic clarity introduces a high degree of uncertainty into the assessment and limits confidence in conclusions regarding residual impacts.

Given this uncertainty, and in the context of emerging obligations under the EU Nature Restoration Law, any development not directly contributing to habitat restoration must be subject to the highest level of scrutiny. A precautionary approach is required, ensuring that the integrity, connectivity, and recovery potential of the wider bog and wetland landscape are not compromised.

3. Population and Health

a) Whilst the Table 5-11 is useful in summarising the effects of the proposed development on specific topics/areas from the construction phase, operational phase and decommissioning phase, the overall chapter would have benefitted from a more coherent structure based on the headings in this table.

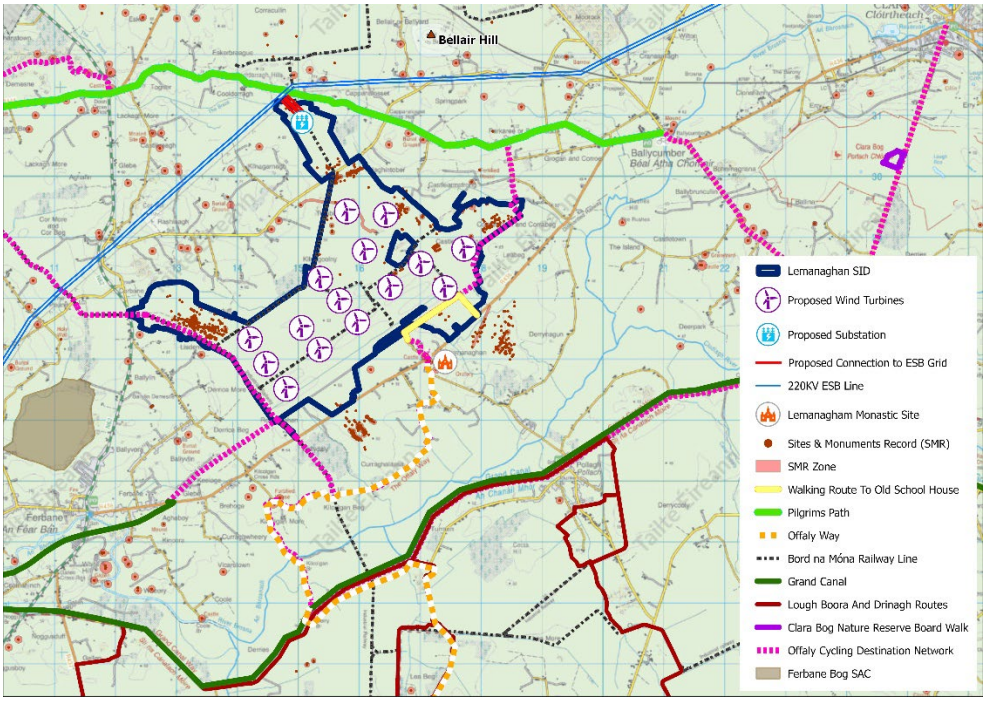
b)

(i) There are numerous references and assessments of the effects of the proposed development in Section 5.3, Baseline Population, and Section 5.4 , Baseline Health. This approach does not adhere to Annex IV(3) of the EIA Directive which requires in relation to the baseline section of an EIA; 'A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the project as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.'

(ii) The Planning Authority is concerned that the baseline section of this chapter is weighted towards the potential positive aspects of the proposed development rather than simply showing what exists in the study area before any development occurs. Section 5.3 does not include;

- evidence of the typical specific economic and employment benefits felt locally in areas which have accommodated renewable energy developments to date rather than only referring to such benefits at a macro and national level.
- details in relation to local attitudes and perceptions to wind energy development in the study area, particularly any issues raised from public meetings or in the local media rather than relying solely on studies and reports at a macro and national level.

c) It is noted that Section 5.3.9.2 omits the Pilgrims Path from Ballycumber to Clonmacnoise. The Planning Authority considers that the undertaking of an assessment of the proposed development would benefit if a map showing the location of the subject site relative to local tourist attractions was provided. In this regard, please see below map for information.



d) In relation to the impact of renewable energy developments on tourism, it is noted that surveys referred to are dated, from 2007 and 2012, in the context of the development of a greater number of and larger sized wind farms in certain parts of the country in recent years.

In addition, other reports and surveys do not detail if the tourist destination were heritage sites, which is an important consideration having regard to the typical expectations of visitors to such sites; a strong sense of authenticity, clear and engaging interpretation, and protection of the site's overall character.

e) The Planning Authority queries a number of the conclusions contained within Section 5.8.2 and 5.8.3 in relation to the significance of the impacts of the construction and operational phase of the proposed development on the local population. In particular, the Planning Authority is unsure based on evidence presented, why the effects of the proposed development from;

(i) construction on property values of dwellings in close proximity to the site, on heritage tourism in the area, on residential amenities of dwellings in close proximity to the site, on traffic and transport are not considered 'Moderate to High' in significance; and

(ii) Operation of the turbines on property values of dwellings in close proximity to the site, on heritage tourism in the area, on residential amenities of dwellings in close proximity to the site are not considered 'Moderate to High' in significance.

f) It is noted that Section 5.8.3.2.8 states that "a total of 58 residential properties may experience daily shadow flicker as a result of the proposed wind farm in excess of the DoEHLG 2006 Guidelines threshold of 30 minutes per day". In acknowledging the mitigation measures proposed, the Planning Authority further seeks that a detailed examination be undertaken by ACP in regard to the level of shadow flicker that may occur.

4. Site Selection and Reasonable Alternatives

(a) There appears to be little consideration of the extensive cultural heritage of Lemanaghan Monastic Complex given in the site selection, alternative layout, location of or number of turbines proposed. Reference is only made in this chapter to impacts on unrecorded, subsurface archaeology rather than consideration of the monastic complex. It should be noted that Lemanaghan is listed in Section 10.10.4 of the Development Plan as a Monastic Site and under Policy BHP-43 of the Development Plan, it is Council to support and promote the protection and appropriate management of all monastic sites in the county.

(b) There is no consideration given to important local views and vistas across Lemanaghan Bog towards Bellair Hill from the Lemanaghan Monastic Complex in relation to the layout of and number of turbines proposed.

(c) Consideration is only given to projects with the potential to generate 90 MW of renewable energy on this site in the context of size and design of the overall development. There appears to be no consideration that the proposed development could potentially generate a reduced installed capacity with capacity being distributed with other suitable sites as listed in Section 3.2.3.3 of the EIAR.

5. Background to the Proposed Project

(a) It is noted that this Chapter omits Table 3.1 from Chapter 3 of the Offaly County Development Plan which outlines the targets for wind energy, solar energy and battery storage demonstrating County Offaly's contribution to realising overall national targets.

Table 3.1 Renewable Energy Targets for County Development Plan period

Wind Energy Target by end of Plan Period: 466.3 MW
Solar Energy Target by end of Plan Period: 145 MW
Battery Storage Target by end of Plan Period: 445 MW

(b) The Planning Authority bring the Coimisiúns attention to Section 3.2.6 of the Offaly County Development Plan 2021-2027 which states;
"Site suitability is an important factor in determining the suitability of wind farms having regard to possible adverse impacts associated with, for example, residential amenities, landscape, including views or prospects, wildlife, habitats, designated sites, protected structures or bird migration paths and compatibility with adjoining land uses. The Council is therefore required to achieve a reasonable balance between responding to overall positive Government policy on renewable energy and enabling the wind energy resources of the Planning Authority's area to be harnessed in a manner that is consistent with proper planning and sustainable development".

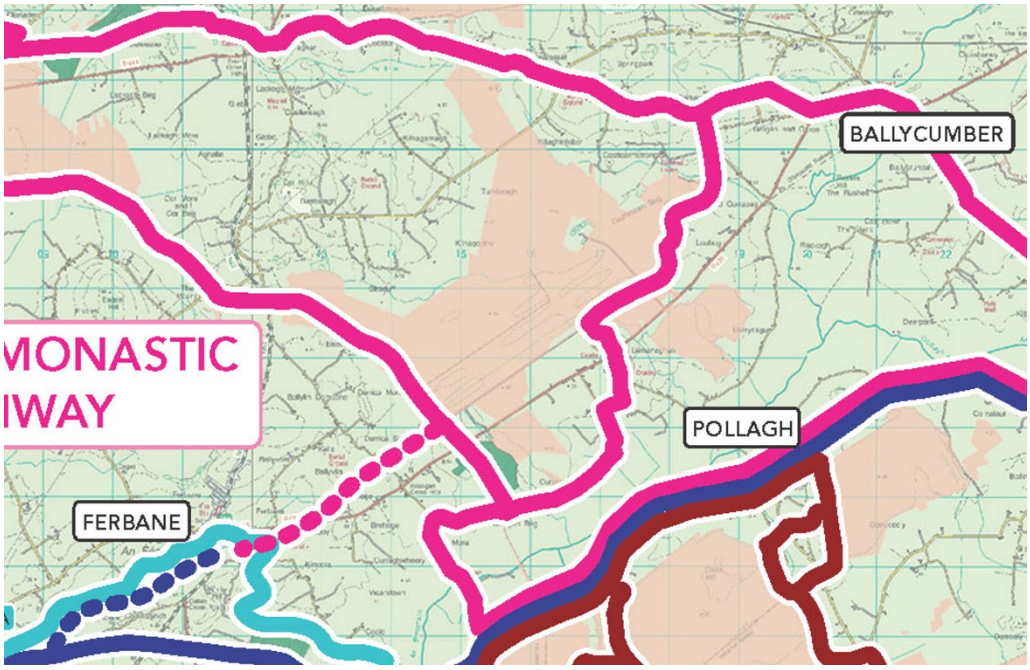
6. Community Gain
The Planning Authority welcomes the provision of the proposed amenity tracks and associated facilities, however the following points are raised:

a) The proposed Amenity Plan does not fully reflect the proposed *Midland Cycling Destination – Offaly* (Bord na Mona, Coillte & OCC) route along the western site boundary of the site. It is noted that the bottom of the western 'spur', banks east to follow the proposed industrial windfarm road rather than the much more appropriate, in terms of amenity, exsiting industrial railway line to meet with the old Banagher – Clara line to the south and then Bord na Mona's Strategic Trail towards the Grand Canal Greenway and Lough Boora. The net effect of what is proposed is bringing the Just Transition funded Strategic trails to the north part of the site, then utilising part of the old railway which would be very good for amenity, then passing onto an industrial road as opposed to continuing down the old railway line to meet up with the Strategic Trail again at the South of the site. It is considered that this aspect of the proposed Amenity Plan constitutes a significant diminution of the amenity potential of the area. See photos below.

b) The Planning Authority queries why the old Banagher – Clara railway line which is currently used for walking and contains some nice screening is not proposed for use as an amenity route as opposed to the industrial windfarm road which runs parallel. See photo below.

c) The Planning Authority is of the view that the former industrial railway along the northern boundary of the western part of the site has potential for an amenity route along the periphery of the site.

d) The potential Pilgrims route, as identified by the Lemanaghan Conservation plan is identified in the *Midland Cycling Destination – Offaly*, is not addressed in the amenity proposals (See broken white line in below map from *Midland Cycling Destination – Offaly).*



e) Three carparks are proposed to be developed in-tandem with the proposed wind farm to accommodate future amenity trails, notably ; one off the N62, one on the Cappanalosset to Rashinagh Road and one off the R436. It is suggested by the Planning Authority that, in order to facilitate access to the Old School House and the monastic site, that it would be beneficial to have the existing track in parallel to the R436 upgraded and facilitate car parking to the rear of the castle and school house.

The Lemanaghan Conservation Plan shows a route agreed early in the 2000s which went from the Monastic Site, up the lane past the school house, then turning right along the exiting track and towards Derrryane Cottage to Castlearmstrong and on to Boher. This is not reflected in the Amenity Network Map submitted as part of this application. The green line for the proposed additional amenity link picks up on the last section of this but not linking from the back of the school house.

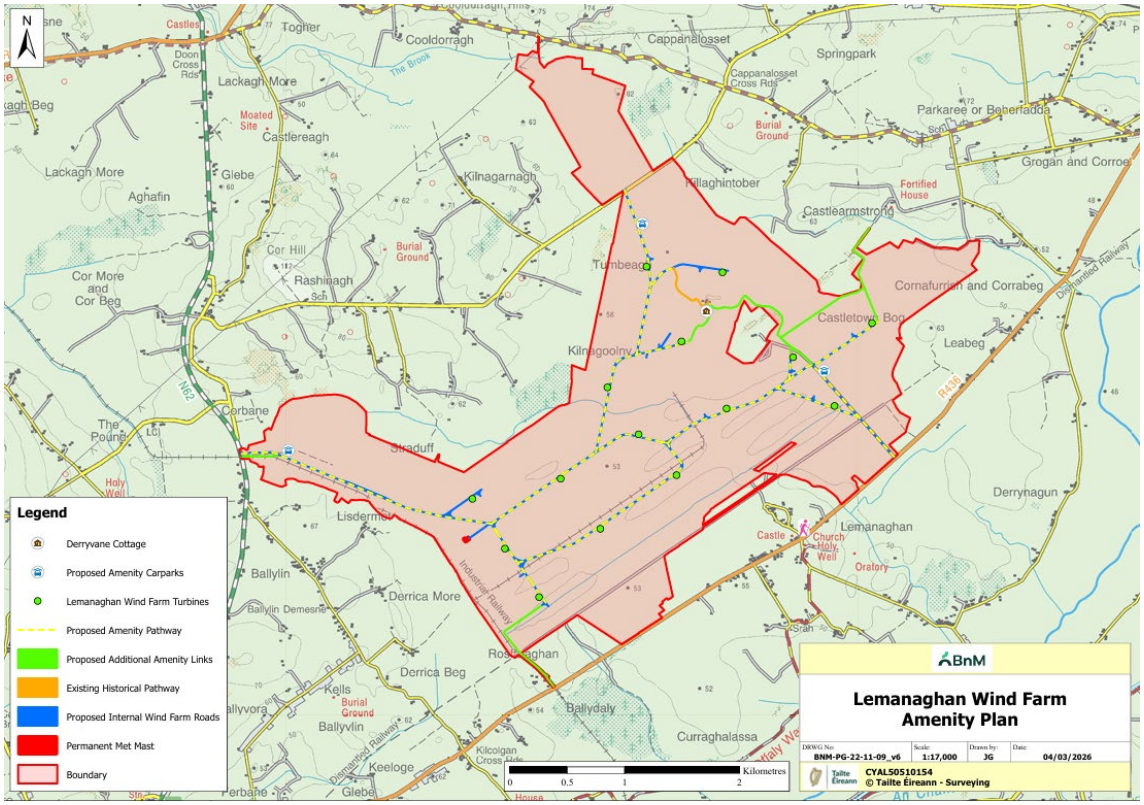
It is requested that a revised amenity plan be sought to address these matters.

13 PLANNING AUTHORITY'S VIEW ON COMMUNITY GAIN

Section 4.8.1 of the EIAR states that *"the value of the Community Benefit Fund will be linked to the productivity of the wind farm and is calculated based on 2/MWh of the overall total generated by the wind farm. It is estimated that the proposed Fund could be in the region of circa €8million over the first 15 years of the operation of the Proposed Wind Farm, on the basis of an annual generation of 275,940 MWh."* This section proceeds to outline key features in the Department of the Environment, Climate and Communications, published the Renewable Energy Support Scheme Good Practice Principle Handbook (2021) in relation to the management, operation and distribution of community funds from wind and solar projects that are successful in the Renewable Energy Support Scheme (RESS) Auctions.

It is noted that the Community Report in Appendix 2-2 states in;

- Section 3.4 that much of the 17.1 km internal site roads will be made available for amenity uses once the proposed windfarm becomes operational and that an additional 3.9 km of new dedicated amenity link, along with the further upgrade of approximately 1.8 km of existing track for the purposes of amenity is also proposed. Three new public car parks are to be provided in the townlands of Lisdermot, Corbane, Cor Mor and Cor Beg, Lemangahan and Tumbeagh. It is also stated that if planning permission is granted for the Proposed Wind Farm, that the associated amenity tracks will connect into the permitted Offaly West portion of the Midlands Trail Network (MTN) (PL Ref: 25/60014).
  It is noted in this regard that the below Amenity Plan is contained in Appendix 4-2;



- Section 4.1.2 outlines that should the Proposed Project be consented and subject to final investment decision, a Community Benefit Fund will be developed during the first year of operation of the Proposed Wind Farm. Potential educational scholarship funds and 'Near Neighbour Scheme' for residences within a prescribed distance of a wind turbine, an annual financial payment, which could be used towards energy bills, home retrofits, or other energy efficiency measures, are referred to as typical forms of community benefit provided.

Comment: So as to avoid duplication, please refer to Section 11, point 6 of this report.

14 DEVELOPMENT CONTRIBUTIONS

The Commission is advised that Offaly County Council's Development Contribution Scheme 2026 – 2032 was adopted on Monday 23 March 2026.

The following **development** contribution applies to the proposed development;

Proposed Turbines:

Extract from Table 2 – Levels of Contributions – Other Categories of Development

	Category	*Amount of Contribution*
G	*Wind Turbines**	*€20,000 per MW of capacity, where tip height < 175m and €25,000 per MW capacity where tip height >=175m*

**Any new buildings associated with projects will be charged at the commercial rate.*

As the height of each turbine is 220 metres, the level of contribution applicable is €25,000 per turbine.

GIS and IPP buildings:

The level of contribution appliable to the proposed GIS and IPP buildings is €6.50 per m² as per Table 1a below.

Extract from Table 1a: Level of Contribution – Residential & Industrial / Commercial Development in all other areas

	Class of Infrastructure	*€ per m² of floor area industrial / commercial development*
A	*Open spaces, cultural, recreational and community facilities, playgrounds, school sites, libraries, arts, amenities and landscaping works, town and village improvement, sports facilities – including land acquisition.*	*€6.50*
B	*Roads, flood relief work, infrastructure including public lighting, footpaths, cycle, public transport and pedestrian facilities, bus corridors and lanes, bus interchange facilites (including car parking for these facilities), car parking, traffic calming measures and land acquisition, drainage, high-capacity telecommunications infrastructure and traffic management.*	*€12.50*
	Total	***€19.00 per sqm***

15 BONDS

In the event of a grant of permission, it is recommended that a bond be attached in order to secure the reinstatement of public roads which may be damaged by the transport of materials to the site.

In addition, in the event of a grant of permission, the Planning Authority seek the provision of a bond in order to secure the satisfactory reinstatement of the site on cessation of the project.

16 PLANNING AUTHORITY'S VIEW ON CONDITIONS

In the event that An Coimisiún Pleanála, as the Competent Authority, grant planning permission for the above development, the Planning Authority recommend that the attachment of planning conditions include the following:

- Reappraisal of Site and Reduced Scale of wind farm
- Timescale for completion, operation and decommissioning.
- Turbines not to be replaced without consent.
- Pre-roads surveys and reinstatement costs.
- Noise levels during construction and operation, including monitoring and a noise complaint monitoring programme.
- Construction Environmental Management Plan
- Archaeological recording, reporting and any further mitigation arising from same.
- Navigation lighting.
- Public lighting.
- Mitigation measures in the EIAR and NIS to be applied.
- Surface water monitoring and management.
- Development contributions.
- Special Development Contributions – Roads. See suggested conditions in report from Birr District Engineer.
- Community Benefit Scheme.
- Bonds.
- Colour – standard off-white / light grey
- Standard condition in relation to telecom tower
- Conditions on environment and water. See suggested conditions in report from Environment and Water Services
- All required costs incurred by the Local Authority in ensuring full compliance with ongoing noise monitoring requirements for the duration of the operational life of the wind farm to be burdened on the applicant.
- Conditions on road and traffic safety. See suggested conditions in report from Birr District Engineer.

17 RECOMMENDATION

Having regard to Section 11 above, in light of the site's sensitivities, concerns expressed and issues raised, the Planning Authority requests that further information be sought which provides the following:

- a significant reappraisal for the overall site
- a significant reduction in the scale of any future proposed wind farm development on this site to include the following revisions; omission of 8(no) turbines notably T5,T9, T10, T11, T12, T13, T14 and T15 as shown on Drawing No. Figure 4-1 in the in Chapter 4 of the EIAR; and submit a Revised Site Layout for any subsequent proposal, ensuring that internal roads and site access arrangements are not located at or within the western ' spur' of the site to the N62 (due to the substantial archaeological sensitivities of the site at this location (including a high number of recorded monuments, a Class 1 Togher, Class 2 Toghers and Class 3 Toghers).

Please note that Offaly County Council has continuously supported wind energy developments in areas with fewer environmental and landscape constraints and the ability to absorb such development(s) since its first County Wind Energy Strategy (adopted in 2009). There is currently 520MW of operational

wind energy developments within Co. Offaly which has been delivered over a short period of time in the context of such developments nationally i.e. the first windfarm was energised in 2014.
In addition, it is submitted that 300MW alone has been energised since 2024, with a further 85MW permitted and awaiting construction imminently and along with a further 247MW currently in the planning system (including the subject application) within the County. The above, when combined (inclusive of the requirements to omit a large portion of the turbines within the current application) represents 9% of the entire country's Climate Action Plan / National Planning Framework 2030 wind energy target of 9,000MW and yet Co. Offaly represents only 2.3% of the country's landmass. It is noted that the total 'pipeline' of wind energy development within Co. Offaly would represent 11% of entire country's wind energy target. It is advised that a number of applications or pending applications for further wind development located outside the Wind Development Areas in the County Development Plan are not included in these figures. Please also note that a significant portion of adjoining Counties' wind energy 'pipelines' (Offaly has 7 neighbouring counties) are located contiguous or close to the Offaly county boundary, with at least five projects crossing / sharing the county boundary. None of the turbines located in the adjacent counties are counted in the above.

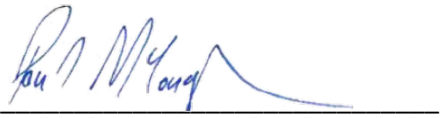
County Offaly was the number 1 producer of renewable electricity in January and March 2026 and number 2 in February, having been in third place for much of the latter part of 2025. (Source: Green Energy Collective based on Eirgrid & SONI data). Until offshore wind energy ramps up in the early 2030s, having regard to the future wind and solar 'pipeline' in the county, it is predicted that this position will be retained into the 2030's.
The Commission is requested to note that Co. Offaly's solar energy 'pipeline' is similarly large and would represent approximately 14% of the entire country's Climate Action Plan / National Planning Framework 2030 target. It should also be noted that the battery and other electricity storage 'pipeline' in Offaly is over 1GW, with approx. 50% of this already installed or nearing the construction stage. Conventional generation eg. gas-fired, biomass fired and distillate 'peaking' plants will total approx. 1.2GW once the recently permitted gas plant in Derrygreenagh is operational.
County Offaly has strongly embraced the transition to renewables in a plan-led manner, starting with its 2009 Wind Energy Strategy. Policy to encourage other technologies, including solar and bio-energy, followed in 2014, as did the policy requirement to strongly consider cumulative impacts. In all other policy respects the policy has remained consistent, in particular the concept of a 'reasonable balance', which, it must be noted was taken directly from the Governments (statutory) Wind Energy Guidelines, 2006. Currently the county is far ahead of its peers and is now beginning to see the 'economic dividend' eg. investment; employment-generating developments where clean energy is a key consideration and community benefit funding - arising from this consistent policy. For example, the Rhode Green Energy Park has proven to be the starting point / trigger for an extremely large Eco Energy Park immediately adjacent to it of which the Commission will be aware.
In addition to very positive and proactive policies and objectives in relation to renewables, the County Development Plan contains many others relating to heritage, amenities, communities, landscape, biodiversity, tourism, cycle and walking development etc. Relevant policies and objectives are listed in the body of this report. It is in the context of all of the above that a major re-appraisal of the proposed project is required.

James Condron (Senior Executive Planner)

15 May 2026

Paula Hanlon (Senior Planner)

15 May 2026



Paul McLoughlin (Deputy Chief Executive)

15 May 2026

APPENDIX A

INTERNAL REPORTS

Heritage Section

Lemanaghan Wind Farm comprising of 15 no. wind turbines

SID 025 –Architectural, Biodiversity and Heritage Conservation Report April 2026
26040_N01 SID025_Lemanaghan Wind Farm Comprising Of 15 No. Wind Turbines.Docx

30 April 2026 Options Report – Architectural Comments

Commentary on SID 025 Submission

This Architectural Conservation Report considers the potential effects of the proposed **Lemanaghan Wind Farm** on the landscape setting of protected structures, recorded monuments and cultural heritage assets within the wider study area. The report focuses on **indirect impacts on setting, views and perception**, as no direct physical impacts on heritage fabric are proposed.

The assessment draws on the findings of **Chapter 14 of the Environmental Impact Assessment Report (EIAR)** – Landscape and Visual Impact Assessment (LVIA), together with the detailed **Cultural Heritage assessment contained in Chapter 13**. Particular regard is given to sensitive heritage receptors, including monastic sites, cemeteries, historic routes and protected cultural landscapes.

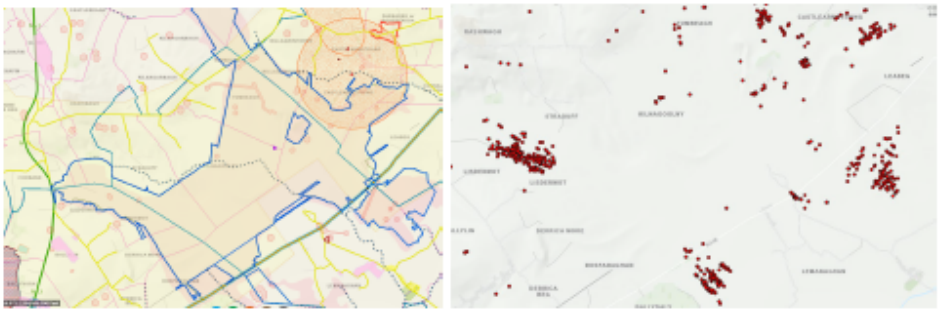
In relation to **SID 025: Lemanaghan Wind Farm**, the following observations are noted from an architectural conservation perspective.

The application confirms, in **Question 15 of the SID Application Form (p.14)**, that the proposed development does not involve works to a Protected Structure or to the curtilage of a Protected Structure. This position is supported by the findings set out in **Chapter 13 of the EIAR**.

15. Development Details:

Please tick appropriate box:	If answer is yes please give details	YES	NO
Does the proposed development involve the demolition of a Protected Structure(s), in whole or in part?			✓
Does the proposed development consist of work to a protected structure and / or its curtilage or proposed protected structure and / or its curtilage?			✓
Does the proposed development consist of work to the exterior of a structure which is located within an architectural conservation area (ACA)?			✓
Does the application relate to development which affects or is close to a monument or place recorded under section 12 of the National Monuments (Amendment) Act, 1994.		✓ See Chapter 13 of the EIAR	
Does the application relate to work within or close to a European Site or a Natural Heritage Area?			✓
Does the development require the preparation of a		✓	

It is acknowledged that no structures listed on the **Record of Protected Structures (RPS)** and no structures recorded in the **National Inventory of Architectural Heritage (NIAH)** are located within the Proposed Project site. This is clearly and consistently confirmed in Chapter 13 of the EIAR.



Planning Internal Viewer and NIAH website map

Recorded Monuments within the Proposed Project Site (SMR)

Notwithstanding the absence of Protected Structures and NIAH structures within the development site, it is important to note that the Proposed Project site contains a **very high density of Recorded Monuments (SMR)**, representing a significant archaeological resource.

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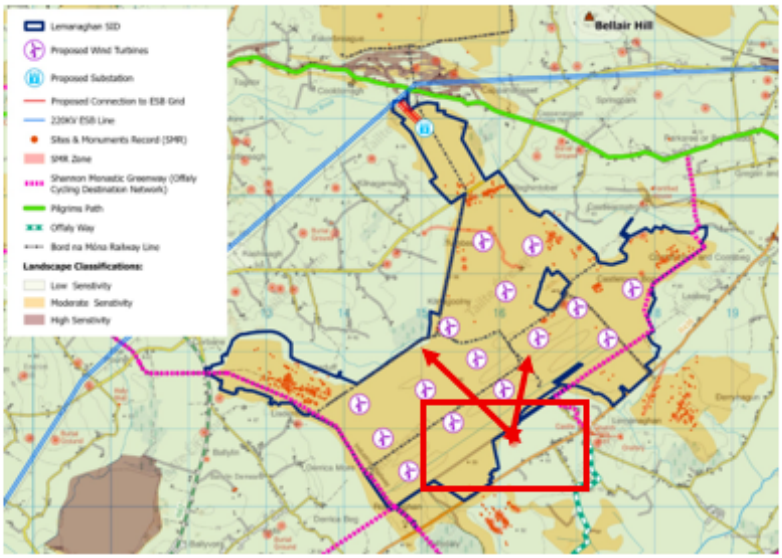
According to the EIAR, a total of **491 Recorded Monuments** are located within the boundary of the Proposed Project site. These monuments are primarily associated with the historic peatland landscape and were largely identified during the **Archaeological Survey of Ireland Peatland Survey (IAWU, 1993–1994)**.

The recorded monument types within the site include:

- **Roads / Trackways** (114), including toghers and gravel or stone trackways;
- **Structures – Peatland** (371), comprising worked or deliberately deposited timber and other materials preserved in peat;
- **Platforms – Peatland** (3), interpreted as raised activity platforms;
- **Post Row – Peatland** (1), likely associated with movement across the bog;
- **Enclosures** (2), surviving as subsurface features with no above-ground expression.

While many of these monuments no longer have visible surface expression due to historic industrial peat extraction, they remain part of the recorded archaeological resource and must be treated accordingly. The EIAR appropriately addresses this through design avoidance, floating road construction where required, archaeological monitoring and licensed testing.

However, given the **exceptionally high density of SMR within the site**, particular attention should be paid to the **extent and alignment of access roads, construction compounds and turbine infrastructure**, as potential impacts are not limited solely to turbine footprints. A **robust and precautionary archaeological assessment, monitoring and management strategy** is therefore essential throughout all stages of construction to avoid inadvertent damage to recorded monuments.



The Lemanaghan Monastic Site – very close to the proposed site

The **Lemanaghan Monastic Site** represents a highly sensitive and nationally significant heritage asset, whose value derives not only from surviving physical fabric but also from its wider landscape setting, visual prominence and historic relationship with the surrounding environment. The appreciation and legibility of this early medieval monastic complex are intrinsically linked to its open and relatively undeveloped setting and to long-established views both towards and from the site.

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While the EIAR provides extensive landscape and visual material, including verified photomontages from selected viewpoints, it is considered that the assessment **underrepresents the degree of impact on the monastic landscape** arising from the proximity of the proposed turbines. In particular, a number of turbines are located at a distance that is **unacceptably close** to the monastic site, resulting in a strong and persistent visual presence within its immediate and wider setting.

The photomontages prepared from the Lemanaghan Monastic Site demonstrate that the turbines would be clearly visible and would read as **dominant vertical elements** within the historic landscape context. Given the scale, height and number of turbines proposed, their presence would fundamentally alter the character of the monastic setting, competing with the landmark qualities of the site and diminishing its sense of isolation and archaeological prominence.

Although the wider landscape has undergone change over time, the concentration of turbines within this part of the scheme, particularly those within the **south-eastern quadrant**, gives rise to concerns regarding cumulative and overbearing effects on the monastic complex and its associated ritual and cultural landscape. From an architectural conservation perspective, this level of impact cannot be regarded as neutral.

Protected Structures and NIAH Structures in the Wider Receiving Environment

The EIAR identifies **47 Protected Structures** and **42 NIAH structures** within 5 km of the nearest proposed turbine. These assets are comprehensively described, tabulated and mapped in Chapter 13 of the EIAR, supported by ZTV analysis, photomontages and photowire views.

From a conservation perspective, particular attention should be given to those structures located closest to the Proposed Project, as these represent the receptors most likely to experience perceptible change in their wider setting.

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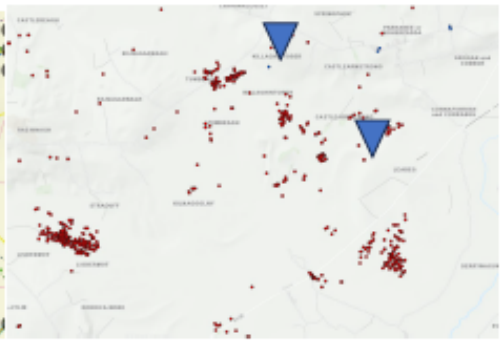
The Protected Structures located closest to the proposed turbines include:

Ferbane Road - Cast iron post box RPS: 21-004 NIAH: 14915003

- **Glebe House – the Rectory RPS: 21-003; NIAH: 14915002**
- **Ballylin House RPS: 21-002 NIAH: 14915001**
- **A couple Protected Structures in Ferbane**



- **Killaghantubber RPS11-006 NIAH 14907004**
- **Castletown Grogan RPS: 11-009**

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The closest situated Protected Structures to the wind turbine

1. **The thatched house at Killaghintober (RPS Ref. 11-06 / NIAH Ref. 14907004)**

   Located approximately **900m from the nearest turbine**, this vernacular structure is the closest Protected Structure and NIAH structure to the development and is therefore the most sensitive architectural receptor.

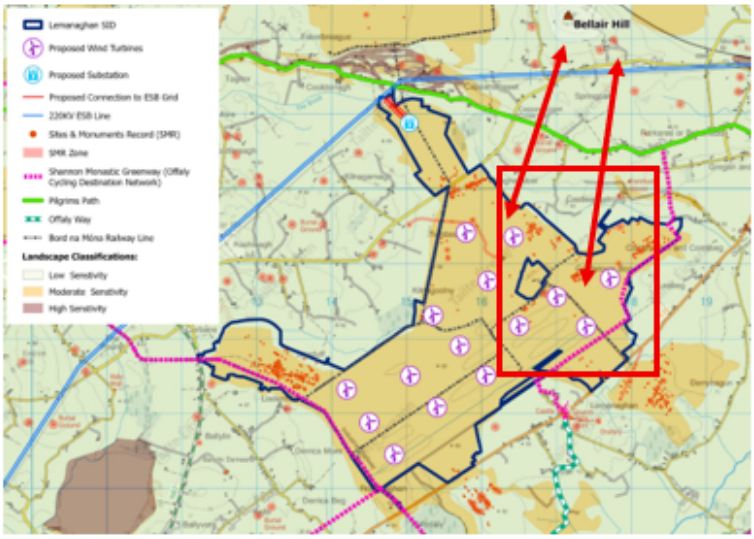
2. **Castle** Grogan **(RPS Ref. 11-09 / SMR OF007-037----)**

   Located approximately 1km from the nearest turbine, this fortified house is both a Protected Structure and a Recorded Monument, with its historic setting closely related to the surrounding bogland landscape.

3. **St Manchán's Church, Boher (RPS Ref. 11-03 / NIAH Ref. 14907001)**

   Located approximately 1.6km from the nearest turbine, this church has strong architectural, associative and spiritual links to the Lemanaghan Monastic landscape.

Bellair Hill and Bellair House



The protection of views and wider landscape setting from **Bellair Hill and Bellair House** remains an important consideration. Bellair House is a **Protected Structure (RPS: 11-07)** and is included in the **NIAH (Reg. No. 14907005)**, located approx. **2 km** from the proposed site.

Neither Bellair House nor its elevated landscape context has been assessed as part of the cultural heritage or landscape and visual impact assessments. Given the prominence of Bellair Hill as a vantage point, this omission is notable. Having regard to the **significant adverse impacts** on the archaeological, cultural, and landscape context of the **monastic complex at Lemanaghan**, and on the **setting, character, and visual amenity of Bellair Hill and House, the five turbines** proposed within the northeastern quadrant of the site **are unacceptable and should be excluded from the proposed development.**

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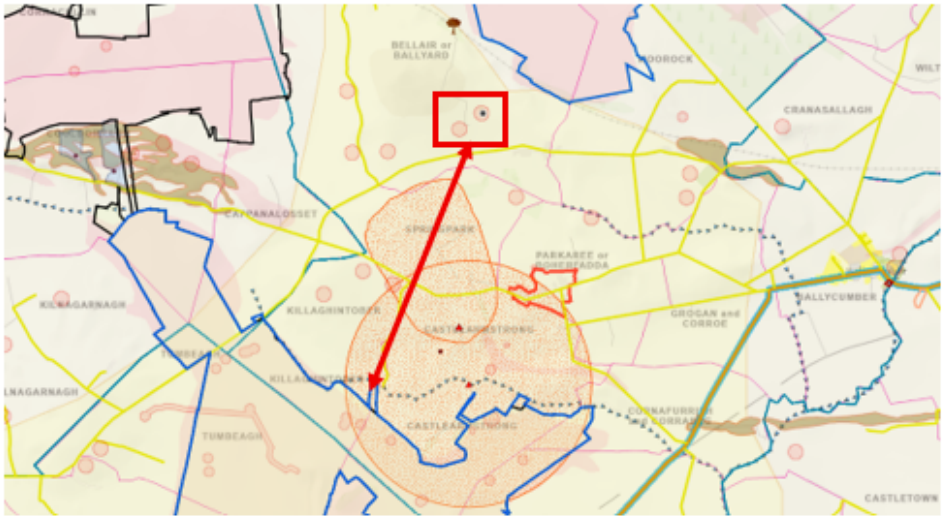

Bellair House is a detached, three-bay, two-storey over raised basement country house, built in 1807 and based on a classical villa plan. The building has a hipped slate roof with overhanging paired bracketed eaves and a centrally placed entrance with a deeply recessed concave surround. The square-headed entrance doorcase is articulated with fluted pilasters and a pulvinated frieze. Window openings are square-headed and fitted with six-over-six timber sash windows at ground floor level and three-over-three sashes at first floor level, all set within limestone surrounds with keystones. The basement openings have segmental-headed limestone surrounds, and a string course marks first-floor sill level. The side elevation is bowed, and a single-storey pilastered addition adjoins the main block.

The house was built for Thomas Horman Mulock (1765–1843) and is almost identical in plan, external form and detailing to Cangort Park House, which supports its attribution to the architect Richard Morrison (1767–1849). Bellair House is a Protected Structure (RPS: 11-07) and is listed in the National Inventory of Architectural Heritage (NIAH Reg. No. 14907005).

While the EIAR includes visual material from a distant viewpoint approx. **20 km** from the proposed turbines, this does not adequately represent views from Bellair Hill, which is significantly closer. A verified photomontage from Bellair Hill is therefore required in order to adequately assess visual impact and effects on setting.

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Additional Conservation Considerations

Proximity to Residential Development and Night-Time Effects

The proposed site is located relatively close to established dwellings as well as to Protected Structures. In addition to daytime visual change, **night-time effects arising from aviation lighting**, together with operational noise, may influence how historic places and residential heritage settings are perceived and experienced after dark. While primarily assessed elsewhere in the EIAR, these effects are also relevant to understanding impacts on setting and sense of place.

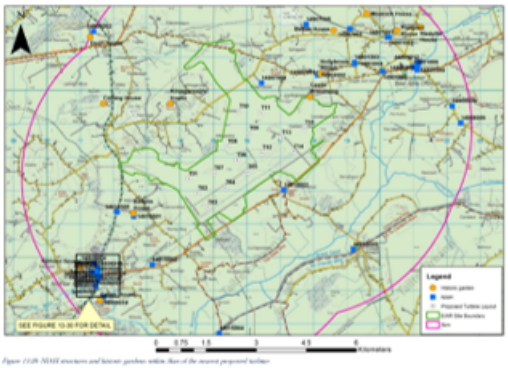
Construction, Access Routes and Archaeological Sensitivity

Considering the archaeological richness and sensitivity of the site, the potential for access roads, construction compounds, and associated ground disturbance to cause adverse and **irreversible impacts on both recorded and as-yet unknown Sites and Monuments Record (SMR) features must be rigorously examined**.

Review of Chapter 13 – Cultural Heritage (EIAR)

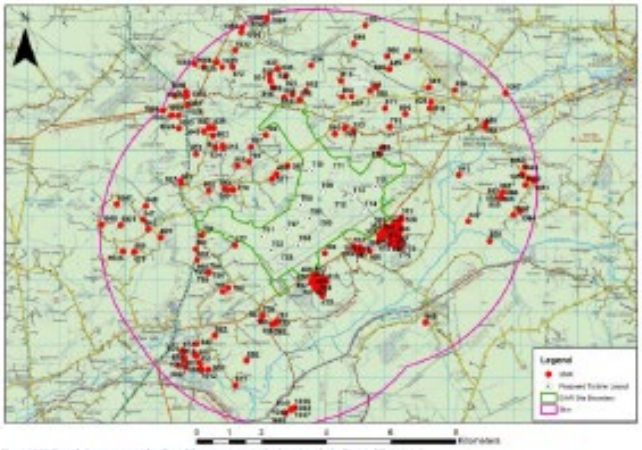
Chapter 13 of the Environmental Impact Assessment Report (EIAR) for the proposed Lemanaghan Wind Farm, Co. Offaly has been prepared in a **clear, detailed and professional manner** and provides a comprehensive assessment of cultural heritage considerations relevant to this Strategic Infrastructure Development application.

The chapter includes a full identification and assessment of cultural heritage assets, including Protected Structures, structures recorded in the National Inventory of Architectural Heritage (NIAH), National Monuments and sites subject to Preservation Orders, within appropriate study areas extending up to 25km from the proposed development site.

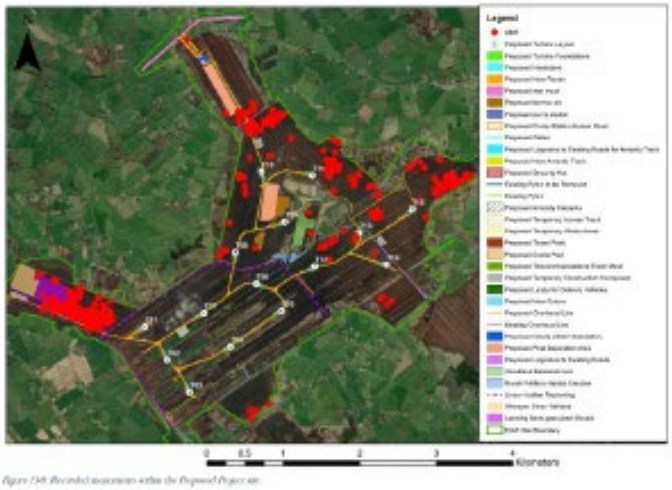


NIAH STRUCTURES WITHIN 5KM OF THE NEAREST PROPOSED TURBINE

PROTECTED STRUCTURES WITHIN 5KM OF THE NEAREST PROPOSED TURBINE



RECORDED MONUMENTS WITHIN 5KM OF THE NEAREST PROPOSED TURBINE



RECORDED MONUMENTS WITHIN THE PROPOSED SITE

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It is noted in particular that:

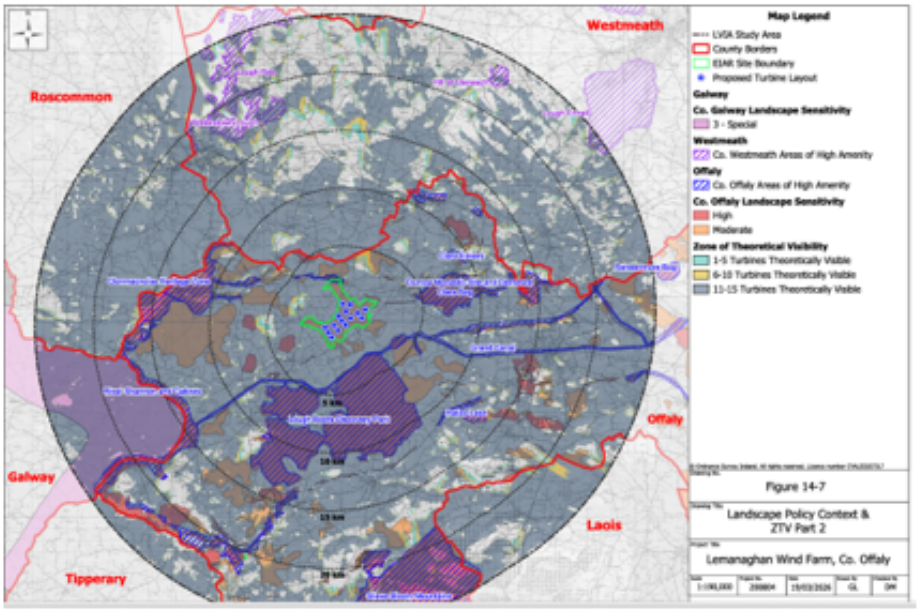
- The assessment states that **no Protected Structures or NIAH structures are located within the Proposed Project site**, nor within the footprint of associated infrastructure, including the proposed substation and grid connection – note the absence of Bellair House.
- Potential impacts are assessed with appropriate regard to **direct impacts, immediate setting and wider landscape setting**, supported by ZTV analysis, verified photomontages and photowire studies;
- The chapter provides a detailed review of **National Monuments and sensitive ecclesiastical and monastic sites**, including the Lemanaghan Monastic Site, together with an assessment of potential cumulative effects arising from existing, permitted and proposed wind energy developments.

The assessment methodology is explained, applied and aligned with best practice guidance. Proposed mitigation and monitoring measures, particularly in relation to archaeological resources within the peatland landscape, are proportionate and appropriate.

From an architectural conservation perspective, Chapter 13 demonstrates a strong understanding of the cultural heritage sensitivities of the area. However, in locations of exceptional significance, such as the Lemanaghan Monastic landscape, it is considered that **the implications of proximity and cumulative visual presence warrant heightened scrutiny**, particularly in relation to setting and experiential qualities rather than physical impact alone. Having regard to the **significant adverse impacts** on the archaeological, cultural, and landscape context of the **monastic complex at Lemanaghan**, and on the **setting, character, and visual amenity of Bellair Hill and House, the five turbines** proposed within the northeastern quadrant of the site **are unacceptable and should be excluded from the proposed development**.

Chapter 14 - Impact on Landscape Setting of Protected Structures and Monuments

From an architectural conservation perspective, the Proposed Wind Farm does not give rise to direct physical impacts on any protected structures or recorded monuments. All potential impacts relate solely to the wider landscape setting.



The landscape and visual assessment has been carried out in a detailed manner, supported by ZTV mapping and a suite of verified photomontages and photowire views. These include representative views from

bridge crossings, public roads and certain heritage locations, notably the **Lemanaghan Monastic Site and cemetery**. The views selected demonstrate that in many cases, the turbines would appear as **distant or background elements**, often partially influenced by vegetation (depending on the season), landform and existing development.

Plate 11.29 View south-west captured from a closer to the south-east of the Lemanaghan Monastic Complex. Annotations have been added to the aerial image to show the location of the Proposed Wind Farm Relative to the Lemanaghan Monastic Complex. Please Note: Lines are 'indicative', please consult mapping figures for high accuracy representation.

Figure 11.32 Visibility from Clonmacnoise

Plate 11.33 View east towards the proposed turbines from Clonmacnoise

However, it is also apparent that in some key heritage locations — **particularly those associated with the Lemanaghan Monastic landscape — the turbines would be clearly visible and would introduce a degree of vertical emphasis that alters the character of the historic setting.** While this effect is assessed within the EIAR as not resulting in significant landscape effects, from a conservation perspective the sensitivity of the receptor and the concentration of turbines within specific quadrants of the scheme remain a concern.

Accordingly, while Chapter 14 provides a thorough and technically sound visual assessment, it is considered that greater weight should be afforded to experiential and setting-based impacts, particularly where historic places derive significance from isolation, openness and long-established views across the landscape.

Historic monastic sites are typically characterised by **low-lying, simple built forms**, carefully integrated into their rural, natural surroundings, often selected for their sense of isolation, tranquillity, and visual coherence. In this context, large-scale wind turbines—by reason of their **height, vertical emphasis, and moving blades**—are visually dominant elements that introduce a **discordant scale and form**. Their presence can overwhelm historic features, interrupt key views and sightlines, and fundamentally alter the visual balance of the landscape that contributes to the site's significance. The rotational movement and reflective materials of turbines further exacerbate this impact, drawing the eye and creating continual visual distraction within what is traditionally a contemplative and static setting.

Given the permanent or long-term nature of wind energy infrastructure, such impacts are often **enduring and, in practical terms, irreversible** for the lifetime of the development. In cumulative terms, the repeated introduction of vertical, modern structures within the wider historic landscape can progressively dilute its coherence and integrity.

Additional Architectural and Landscape Conservation Considerations

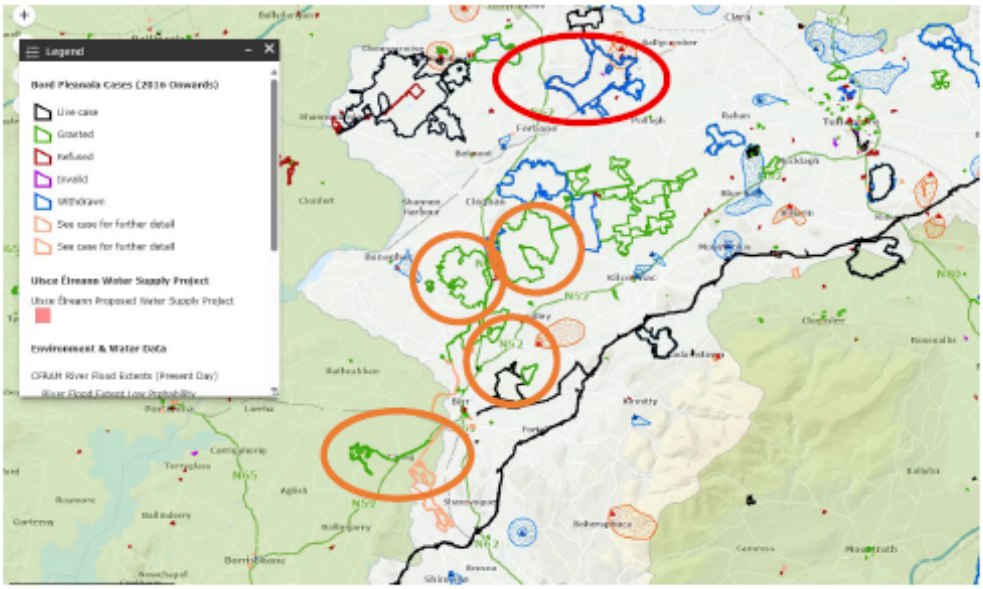
Impact on Existing Road Infrastructure and Landscape Character

From an architectural conservation and landscape perspective, further clarity is required regarding the potential impact of the proposed development on the existing road network within and around the site. In particular, consideration should be given to whether local and regional roads will require widening, realignment, strengthening or other physical alteration to facilitate turbine delivery, construction traffic and long-term maintenance access. Such works have the potential to fundamentally alter the rural road character, historic route alignments and surrounding landscape setting, particularly where roads form part of the historic peatland infrastructure or contribute to the appreciation of nearby heritage assets. **Any requirement for road upgrades should therefore be clearly identified, justified and assessed in terms of its cumulative impact on landscape character, visual amenity and the setting of Protected Structures, Recorded Monuments and historic landscapes.**

Cumulative Impact of Wind Energy Development in the Wider Midlands and Birr Area

It is considered essential that further research and assessment be undertaken in relation to the **cumulative density of existing, permitted and proposed wind farms within the wider Midlands**, and in particular within the environs of Birr and its surrounding cultural landscape. The Birr area represents a highly

sensitive heritage environment, characterised by a concentration of Protected Structures, castles, historic demesnes and former country houses, many of which derive a significant portion of their heritage value from their designed landscapes, long-established views and visual relationships with the wider countryside.



The continuing intensification and close spacing of wind energy developments within this region raises concern that cumulative effects may erode the distinctive landscape character of the Midlands, resulting in an environment perceived as increasingly dominated by large-scale infrastructure rather than by natural, historic and architectural features. This shift has the potential to negatively affect the aesthetic quality of the landscape, diminish the appreciation of heritage assets and reduce the legibility of historic place-making. A strategic consideration of whether the current and emerging level of wind farm concentration is appropriate for this sensitive region is therefore warranted as part of a precautionary conservation-led approach.

Overall Conservation Summary and Conclusions

While the EIAR concludes that impacts on Protected Structures and NIAH-listed buildings are limited to changes in the wider landscape setting and are therefore assessed as Not Significant, it is considered that this conclusion does not fully reflect the sensitivity, complexity and cumulative vulnerability of the receiving heritage environment.

- From an architectural conservation perspective, greater weight should be afforded to the scale, proximity and cumulative visual presence of the proposed turbines and to the manner in which they would affect the setting, perception and experiential appreciation of key heritage assets. This is particularly relevant in relation to the Lemanaghan Monastic Site, where turbines are located at distances considered unacceptably close from a conservation standpoint, resulting in sustained and overbearing visual impacts that diminish the openness, archaeological legibility and landmark qualities of this nationally significant monastic landscape.
- It is further noted that Bellair House and Bellair Hill, despite their relative proximity to the Proposed Project and their elevated vantage point, have not been adequately assessed within the EIAR. The absence of verified photomontages from Bellair Hill represents a notable gap in the assessment, and additional visual material is required to allow a complete and balanced understanding of potential impacts on the setting

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of this Protected Structure. Having regard to the **significant adverse impacts** on the archaeological, cultural, and landscape context of the **monastic complex at Lemanaghan**, and on the **setting, character, and visual amenity of Bellair Hill and House, the five turbines** proposed within the northeastern quadrant of the site **are unacceptable and should be excluded from the proposed development.**

- The proposed development is situated in close proximity to established dwellings and to a number of Protected Structures. The combined effects of daytime visual change, night-time aviation lighting and operational noise have the potential to influence the setting, character and lived experience of nearby heritage assets and historic places. These indirect and cumulative effects warrant explicit acknowledgement within the overall conservation assessment.
- In addition, the Proposed Project site contains an exceptionally high density of Recorded Monuments (SMR). While mitigation measures are proposed, the scale of development necessitates particular caution in relation to access roads, construction compounds and ground disturbance. A robust, precautionary and continuously monitored archaeological management strategy is essential across all project phases for any approved turbines. As presence can overwhelm historic features, interrupt key views and sightlines, and fundamentally alter the visual balance of the landscape that contributes to the site's significance -a considerable reduction in the number of turbines should be agreed.
- Having regard to the cumulative concentration of wind energy development within the wider Midlands and the sensitive heritage environment surrounding Birr, it is considered that the current layout and scale of the proposal would benefit from further refinement. This may include a reduction in turbine numbers, increased separation distances from significant heritage assets and residential areas, and a more strategic consideration of cumulative landscape capacity.

Let me know if you require additional information.

Wiktoria Stepczynska-Motyl

Wiktoria Stepczynska-Motyl, MSc ArchEng

Architectural and Planning Technician

Rachel Mc Kenna

Rachel Mc Kenna, MRIAI

Senior Executive Architect

RIAI Registered Architect 2026 Conservation Architect G1

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27 April 2026 SID Lemanaghan - 15 no. wind turbine- Heritage Officer Notes

Environmental Impact Assessment report
Chapter 14
Table 14.9
Cultural Meaning / Associations *There are some valuable cultural associations with the site, including for the surrounding local communities who have historically worked on the land of the bog, or used it as a source of fuel in the past. There is evidence of historic togher roads traversing the peatlands within the site which may have accessed historic monuments and other locations of the surrounding cultural landscape such as the Lemanaghan Monastic Site.* … In consideration of the factors detailed in the table above, and the designations outlined in the OCDP, the landscape value of the Proposed Project site is deemed to be 'Low/*Medium*'.... *Overall, the sensitivity of this landscape to a wind farm development is deemed to be 'Low'.*

- Cannot agree with this low/medium evaluation – the site provides a much wider context for the Lemanaghan monastic site.

Appendix-04-2-Lemanaghan Wind Farm Amenity Plan

- Three carparks are noted. One off the N62, one on the Cappanalosset to Rashinagh road and one off the R436. In order to facilitate access to the Old School House and the monastic site it would be constructive to have the existing track in parallel to the R436 upgraded and facilitate car parking to the rear of the castle and school house.
- There is a very short orange line showing 'existing historical pathway'. The Lemanaghan Conservation Plan shows a route agreed early in the 2000s which went from the Monastic Site, up the lane past the school house, then turning right along the exiting track and towards Derryane Cottage to Castlearmstrong and on to Boher. This is not reflected in the current map. The green line for the proposed additional amenity link picks up on the last section of this but not linking from the back of the school house.

Appendix 13.5

- Figure 1.1 – Aerial view and geographical context of Lemanaghan monastic complex and the proposed project site does not include the monastic enclosure (which was referenced in the document – Geophysical survey by Gibson – nor does it show the line of the trackway leading on from The Rectangular Enclosure – knowns as St Mella's Cell OR015-004014). They are also not shown in Plate 4. Plate 5 does show the togher to the NE but not the site boundary line.

Appendix-13-7-The Archaeology of Lemanaghan Bog

- A vast 470 knows sightings of archaeological material in the Lemanaghan Substitute application area are recorded with it noted that there is a 'moderate to high potential for archaeological heritage to be uncovered during the course of any future development works in Lemanaghan bog.

Amanda Pedlow

Oifigeach Oidhreachta

Heritage Officer

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SID Lemanaghan - 15 no. wind turbine

Biodiversity Officer Notes (14/05/2026)

Biodiversity + Birds

The proposed windfarm development must be considered within the context of a highly sensitive and extensively modified bog and wetland landscape, where historic peat extraction has resulted in significant habitat loss, fragmentation, and degradation. In such a setting, even incremental additional pressures may give rise to disproportionately significant ecological effects. Accordingly, a precautionary, landscape-scale approach is essential.

Particular emphasis must be placed on the protection, restoration and long-term management of peatland habitats, ensuring that hydrological regimes, habitat integrity and ecological functionality are not only maintained but demonstrably enhanced over time. Given the critical role of hydrology in sustaining peat-forming systems, any disruption—direct or indirect—must be rigorously avoided or fully mitigated in line with best practice under the **Environmental Liability Directive, Environmental Impact Assessment (EIA) Directive, and the European Communities (Birds and Natural Habitats) Regulations 2011–2021.**

The development must also explicitly recognise the wider ecological network of the Midlands bog complex, including functional connectivity between cutaway bogs, raised bog remnants, wet grassland, callows, and associated river corridors within the broader Shannon catchment. Habitats of seemingly low intrinsic value may nonetheless function as essential steppingstones, commuting routes, or buffer zones for Annex I habitats and Annex II species, and therefore require careful consideration.

There is a particular need to protect and strengthen bat populations, including roost sites, commuting corridors and foraging areas. The fragmentation of linear landscape features such as hedgerows, drains and treelines, in conjunction with turbine placement, has the potential to create barrier effects and disrupt established bat movement patterns, contrary to the requirements of the Habitats Directive and associated national legislation.

Furthermore, the proposal must fully account for impacts on bird species, with specific regard to both resident and migratory populations. The site and surrounding landscape are known to support a range of sensitive species associated with peatland, wet grassland and upland habitats, including Hen Harrier (Circus cyaneus), Merlin (Falco columbarius), Curlew (Numenius arquata), and Common Crane (Grus grus), alongside wintering and passage species such as Whooper Swan (Cygnus cygnus) and other migratory waterbirds.

Of particular concern are:

- **Barrier effects** arising from turbine arrays, which may alter established flight lines, displace birds from suitable foraging and breeding habitats, and increase energetic costs, particularly for migrating species;

- **Collision risk**, both alone and in-combination with existing and permitted wind energy developments, especially along known migratory routes and within functional ecological corridors;

- **Disturbance and displacement effects**, including the potential abandonment of roosting, nesting or foraging habitats;

- **Loss or degradation of functionally important habitat**, including winter roost sites for Hen Harrier and potential breeding or prospecting habitat for Common Crane

The repeated use of bog habitats in proximity to the site by Hen Harrier strongly indicates the presence of an **established winter roost.** Such sites are of high conservation importance and are particularly vulnerable to disturbance, lighting, noise, and operational activity. Their loss or degradation would represent a significant adverse effect on a strictly protected species and must be assessed in accordance with the precautionary principle.

In relation to Common Crane the assessment must move beyond a narrow interpretation based on current population size and instead incorporate known recolonisation trends, expansion potential, and the presence of non-breeding and prospecting individuals within the wider landscape. Any reliance on speculative future habitat enhancement measures, without secured delivery mechanisms, resourcing, monitoring, and adaptive management, should not be afforded weight in the assessment of likely significant effects.

The applicant must demonstrate full compliance with international best practice in avoiding, reducing and mitigating **bird strike risk**, including robust collision risk modelling that incorporates cumulative and in-combination scenarios, particularly in light of increasing wind energy development across the Midlands. This is particularly important given the evolving landscape context and the likelihood of increased pressure on migratory corridors.

In addition, a comprehensive, enforceable, and adequately resourced long-term monitoring and adaptive management programme must be provided, covering the full operational lifetime of development. This should include triggers for corrective action where unforeseen impacts arise, in line with best practice under IPC (Integrated Pollution Control) licensing conditions and EPA guidance where applicable.

Crucially, the assessment must robustly address in-combination and cumulative effects, taking into account existing, permitted, and proposed wind energy developments; ongoing

peatland rehabilitation and restoration initiatives; agricultural intensification and land-use change; and historic habitat loss and fragmentation across the bog complex.

The current approach, which largely treats impacts in isolation and at a project-specific scale, fails to adequately capture the cumulative erosion of ecological resilience within the wider system. In a landscape where intact raised bogs have been reduced to small remnants, the incremental loss of marginal habitats, ecological corridors, and buffer zones may significantly undermine long-term restoration objectives.

Furthermore, the **absence of a coordinated, strategic masterplan** for the Bord Na Móna Offaly and adjoining bog and wetland complexes significantly constrains the ability to assess long-term cumulative ecological effects in a meaningful way. This lack of strategic clarity introduces a high degree of uncertainty into the assessment and limits confidence in conclusions regarding residual impacts.

Given this uncertainty, and in the context of emerging obligations under the EU Nature Restoration Law, any development not directly contributing to habitat restoration must be subject to the highest level of scrutiny. A precautionary approach is required, ensuring that the integrity, connectivity, and recovery potential of the wider bog and wetland landscape are not compromised.

Environment and Water Services

Offaly County Council
Water Services

Planning Conditions

To: Planning

Planning Ref: SID 025
Lemanaghan Wind Farm - ACP-324161-26

Date: 30th April 2026

Application for: 15 NO. WIND TURBINES, A PERMANENT 220KV ON-SITE SUBSTATION AND ASSOCIATED INFRASTRUCTURE.

Applicant: LEMANAGHAN WIND FARM DESIGNATED ACTIVITY COMPANY.

Location: LEMANAGHAN AND SURROUNDING TOWNLANDS, CO. OFFALY.

Environment & Water Services have no objection subject to the following conditions:

General

1. All mitigation measures as outlined in the submitted Construction and Environmental Management Plan shall be implemented by the applicant/developer for the construction & operational phase of the development.

2. All mitigation measures as outlined in the submitted Flood Risk Assessment shall be implemented by the applicant/developer for the operational & construction phase of the development.

3. All mitigation measures as outlined in of the submitted Appropriate Assessment Screening Report and Natura Impact Statement shall be implemented by the applicant/developer for the construction & operational phase of the development.

4. All mitigation measures as outlined in the submitted Environmental Impact Assessment Report shall be implemented by the applicant/developer for the construction, operational phase & decommissioning phase of the development.

5. All statutory consents and licences required to commence construction Works on-site shall be obtained prior to works commencing, including but not limited to; Site notices, Construction commencement notices, Licence to connect to existing utilities (including water) and mains sewers, where required, Abstraction and / or discharge licenses, where required, Road opening / closure licences, etc.

Offaly County Council
Water Services

Planning Conditions

Surface Water

1. Surface water run off from the roofs, roads and hardstanding areas shall be collected and disposed of within the site to soakaways or proposed attenuation overflowing to the adjacent watercourse. No such surface water run off shall be allowed to flow onto the public roadway or other adjoining properties;

2. The applicant shall maintain/preserve any existing riparian corridor/drain present within and/or adjacent to the site by implementing a buffer zone where no development is permitted in accordance with Offaly County Council's, Development Plan 2021-2027.

Foul Sewerage

1. In the event that foul waste is to be removed regularly from site by a contractor during construction phase, the developer shall submit a signed maintenance contract with an Authorised Waste Collector and all foul waste must be transported to an Authorised Waste Facility.

Waste Management

1. All wastes arising from/at the proposed development shall be managed in accordance with the Waste Management Acts 1996 as amended. While awaiting removal, all waste materials shall be stored in designated areas protected against spillage or leachate run-off.

2. All uncontaminated soil and stone imported onto the site shall comprise non-waste by-product, in accordance with Article 27 of the European Communities (Waste Directive) Regulations 2011, S.I. Nó. 126 of 2011

3. No development shall commence prior to registration with the Environmental Protection Agency of the material to be imported onto the lands, in accordance with Article 27 of the European Communities (Waste Directive) Regulations 2011, S.I. Mo. 126 of 2011

4. Prior to commencement of development, details regarding the origin/source of proposed soil & stone to be imported onto the site shall be submitted for the written agreement of the Planning authority

Environmental Nuisance

1. Noise emissions at the nearest noise sensitive location (such as dwellings, schools, places of worship or areas of high amenity) shall not exceed the following:

LAeq (60 minutes)	55dB(A)	8am to 8pm
LAeq (15 minutes)	45dB(A)	8pm to 8am

Offaly County Council
Water Services

Planning Conditions

2. Audible tonal or impulsive components should be minimised at any noise sensitive location;

3. The Applicant shall take reasonable measures to mitigate any environmental nuisance (noise and dust) which may arise during construction. Construction shall take place during working hours 7am to 6.30pm Monday to Friday and 8am to 1.30pm Saturday unless otherwise authorised by the Planning Authority;

4. Dust suppression shall be undertaken under dry and windy conditions to ensure that dust deposition does not exceed 350mg/m²/day.

Biodiversity & Landscape

1. The applicant shall maintain/preserve any existing hedgerow/woodland/trees present within and/or adjacent to the site in accordance with Offaly County Council's, Development Plan 2021-2027

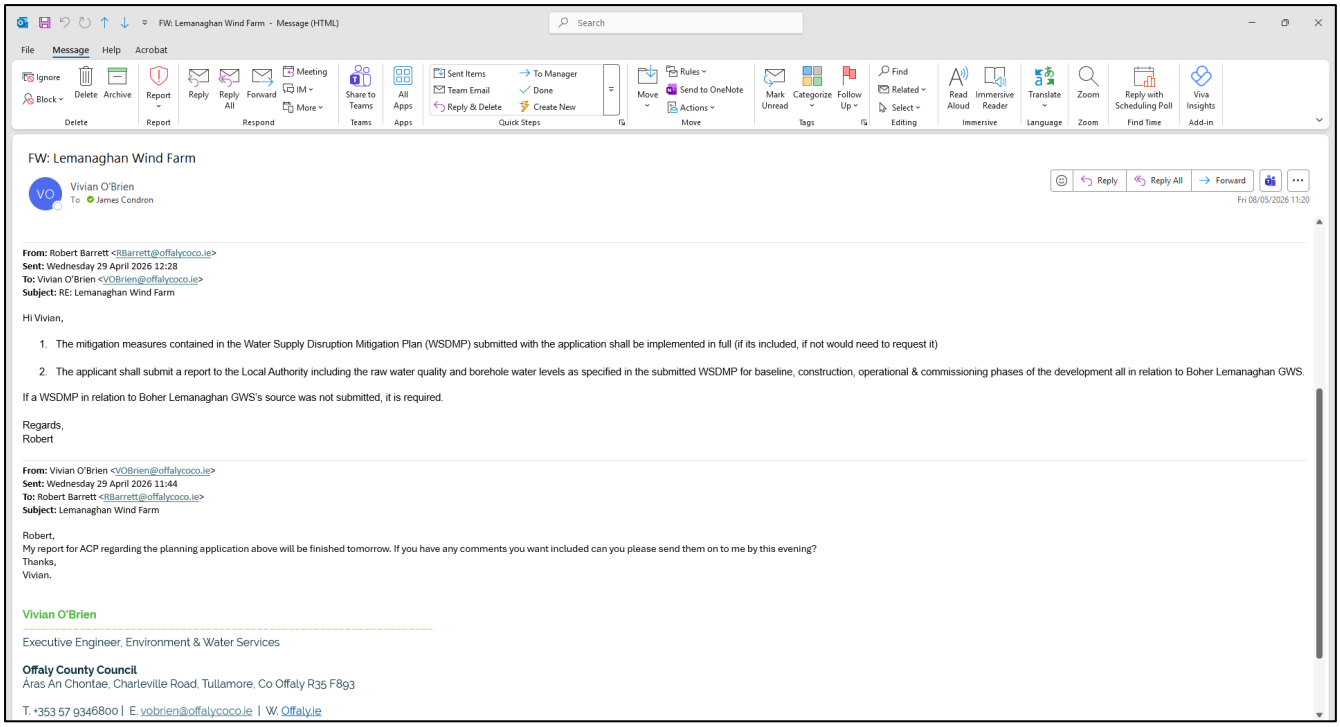
2. Where hedgerow/woodland/tree removal is required to facilitate the development, the applicant shall apply for a Tree Felling Licence from the Forestry Service, Dept. of Agriculture, Food and the Marine in compliance with the Forestry Act 2014.

Report by:

Vivian O'Brien,
Executive Engineer,
Environment, Climate Action &
Rural Water.

Approved:

Damien English,
A/Senior Executive Engineer,
Environment, Climate Action &
Rural Water.



FW: Lemanaghan Wind Farm - Message (HTML)

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FW: Lemanaghan Wind Farm

VO Vivian O'Brien
To James Condron

Reply Reply All Forward
Fri 08/05/2026 11:20

From: Robert Barrett <RBarrett@offalycoco.ie>
Sent: Wednesday 29 April 2026 12:28
To: Vivian O'Brien <VOBrien@offalycoco.ie>
Subject: RE: Lemanaghan Wind Farm

Hi Vivian,

1. The mitigation measures contained in the Water Supply Disruption Mitigation Plan (WSDMP) submitted with the application shall be implemented in full (if its included, if not would need to request it)

2. The applicant shall submit a report to the Local Authority including the raw water quality and borehole water levels as specified in the submitted WSDMP for baseline, construction, operational & commissioning phases of the development all in relation to Boher Lemanaghan GWS.

If a WSDMP in relation to Boher Lemanaghan GWS's source was not submitted, it is required.

Regards,
Robert

From: Vivian O'Brien <VOBrien@offalycoco.ie>
Sent: Wednesday 29 April 2026 11:44
To: Robert Barrett <RBarrett@offalycoco.ie>
Subject: Lemanaghan Wind Farm

Robert,
My report for ACP regarding the planning application above will be finished tomorrow. If you have any comments you want included can you please send them on to me by this evening?
Thanks,
Vivian.

Vivian O'Brien
Executive Engineer, Environment & Water Services

Offaly County Council
Áras An Chontae, Charleville Road, Tullamore, Co Offaly R35 F893

T. +353 57 9346800 | E. vobrien@offalycoco.ie | W. Offaly.ie

Road Design

ROAD DESIGN COMMENTS

To:	***Planning***
From:	Danny Mangan, Executive Engineer
Date:	7th May 2026

Planning Ref. No. ACP-324161-26	***Road Class: N62 and R436.***
Applicant:	Lemanaghan Wind Farm Designated Activity Company
Agent:	MKO
Proposed Development:	SID - Proposed development of 15 no. wind turbines, a permanent 220kV on-site substation, and associated infrastructure
Site Address:	Lemanaghan and surrounding townlands, Co. Offaly.

In reference to the above application, I have reviewed all documentation submitted and comment as follows:

General Requirements

- A Construction Management Plan shall be submitted to Offaly County Council (OCC). Contents to include implementation of planning conditions and EIS requirements.
- OCC shall be advised of details of PSDP, PSCS and contractors involved in the development prior to commencement.
- Any required road opening licences will be applied via RMO/OCC.
- Contractor insurance details shall be provided to OCC for reference.
- Performance bond in place prior to commencement of works. Refer to the below bond calculation.
- A dedicated liaison engineer shall be appointed by the developer and all associated costs covered by the developer.
- Long term damage fee or works in lieu.
- Developer shall consult with An Garda Síochána, emergency services and bus operators in relation to each stage of the works and any traffic management measures.
- Developer shall liaise with all affected Planning Authorities and Transport Infrastructure Ireland (TII).
- Developer shall arrange for liaison with the public, residents, businesses and schools.
- Allow for briefing of Elected Members in the affected Municipal District at dates determined by OCC.
- The developer shall allow for the accommodation of local events, such as charity walks and cycles in the works programme.

Page 1 of 4

Turbine Delivery Routes

- Developer shall liaise with TII, Birr Municipal District & Offaly County Council in relation to deliveries.
- Detailed programme of deliveries shall be submitted to OCC in advance of commencement of deliveries. Details to include dates and times, number of loads, weights, road closure and diversion routes, support vehicles, etc.
- Identification of landowners at all nodes and entry/exit points requiring temporary or permanent works. If OCC consider that the land used for any temporary or permanent works would be beneficial for the improvement of the existing road, then the developer shall carry out a design for the improvement and implement same.
- Pre-condition and post-condition surveys of delivery routes, consisting of a video survey and photographs, and a detailed survey of all node locations shall be carried out and a copy submitted to OCC. Survey at nodes to include drainage, landscaping, surfacing, boundary fences/hedges/gates and signage.
- Where OCC consider a proposed delivery route is not in a suitable condition, the developer shall upgrade the road or junction in advance of delivery operations.
- Any damage caused to the public road shall be repaired to its previous condition, to the satisfaction of OCC.
- Developer shall consult with all service providers (including Uisce Éireann) in relation to turbine delivery routes. OCC to be advised of any alterations required.
- Developer shall consult with An Garda Síochána and emergency services in relation to the turbine deliveries.
- Design and construction details for temporary modifications at node points to be submitted for approval by OCC. Details to include arrangements for both delivery phases and operational phases. Road Safety Audits in accordance with TII Road Safety Audit Guidelines, GE-STY-01027 shall be undertaken.
- Amendments to access points from the N62 shall be designed and constructed in line with all relevant TII design standards.
- Abnormal load permits will be required.
- Any alterations affecting the width of the existing roads shall be reinstated to the original width, unless otherwise agreed with OCC. Where roads are widened, the specification shall be that of the existing road as a minium.
- An emergency plan shall be submitted to OCC.
- Developer shall liaise with local groups such as Tidy Towns, etc.
- Developer shall liaise with the TII and OCC for transportation on the National Road Network.
- All areas affected by the works shall be fully reinstated to their original condition. Where landscaping has been removed, similar plants of similar maturity shall be used for reinstatement. Where it is not possible to replace mature trees, younger trees plus additional landscaping shall be provided in lieu to enhance the area. Where hedging is removed and new hedging planted as reinstatement, suitable fencing shall be provided for the protection of the hedge, and maintenance shall be provided until the hedge is established.

Where grass is replaced with new seeding, the grass shall be maintained until it is established. Full reinstatement shall be completed within one month of the final delivery.

Materials Delivery Routes:

- Developer shall liaise with TII, Birr Municipal District & Offaly County Council in relation to deliveries.
- Detailed programme of deliveries to be submitted to OCC for prior approval in advance of commencement of deliveries. Details to include number of movements per day, weights.
- Traffic management plans shall be submitted for haulage of materials, including at entry/exit points.
- Pre-condition and post-condition surveys of delivery routes, consisting of a video survey and photographs, a Road Condition Survey, and an FWD Survey where required, shall be carried out and a copy submitted to OCC.
- Where OCC consider a proposed haul route is not in a suitable condition, the developer shall upgrade the road or junction in advance of haulage operations.
- Any defects that appear during the haulage period shall be rectified by the developer.
- Any damage caused to the road shall be repaired to its previous condition, to the satisfaction of OCC. A defects liability period of 2 years shall apply. This shall commence when written notification has been given that the permanent reinstatement/overlay has been completed (where applicable).

- Public roads shall be kept free of mud, dust, spillages and debris. Any necessary measures shall be put in place at site entry/exit points.

Culvert Construction:

- Details of Culvert Extension shall be submitted to OCC in advance of commencement of works. Details to include works programme, construction details, cross-sections for each aspect of the works.
- If a road or lane closure is required, an application must be submitted to OCC at least 8 weeks in advance.
- Where road works speed limits are required, an application shall be submitted to OCC at least 8 weeks in advance. Signs to be erected by the developer.
- Traffic management plans to be submitted for each stage of the works.
- Pre-condition and post-condition surveys of the culvert location, consisting of a video survey of the area and photographs at every entrance and boundary structure to be carried out and a copy submitted to OCC. Any damage caused to the road or adjacent properties shall be repaired to its previous condition or to the satisfaction of OCC and/or landowner.
- All works shall be in accordance with the relevant TII design standards and specifications.

Bond Calculation:

The calculation of the Bond is based on the areas of all road classifications used to facilitate the development (National Secondary /Regional /Local Roads).

The rates below are extracted from our most recent tender rates and are indicative only and we have endeavoured to be fair and reasonable in applying same. Obviously, costs associated with any works that require the application of the Bond will be based on the outcome of a procurement process at the time of the works.
The information below is solely for calculating the Bond amount and does not assign a specific treatment ethos to specific parts of the road. Therefore, the need for the bond and the application of the Bond if required shall be for any section of the affected road network within County Offaly. The treatment measures applied at said location will be based upon the requested requirements of the Municipal District Engineer and must be sufficient so as to return the road to a standard that meets the technical requirements and specifications for same and mitigates all issues and failures.

Given that the haul routes have not been identified in the application, the calculation of the Bond will be calculated upon receipt of this information. The basis of the calculation will be the rate for approximately €25/m2 for typical strengthening intervention (based on recent tendered rates).

Please also refer to the Municipal District report in relation to the proposed development.

Date: 7th May 2026

Danny Mangan
Executive Engineer
Roads Section

Offaly County Council **Birr Municipal District**

To:	**OCC Planning Department**
File Reference:	**SID 025 Lemanaghan Wind Farm_ACP-324161-26**
Applicant:	**Lemanaghan Wind Farm Designated Activity Company**
Site Address:	**Lemanaghan and surrounding townlands.**
Date of Memo:	**1/5/2026**
Subject Matter:	**Area Engineer's Report - Municipal District of Birr**

Comhairle Chontae Uibh Fhaili
Offaly County Council

Request from OCC's Planning Department to Birr MD was as follows:

An Coimisiún Pleanála has received an application for permission under section 37E for Lemanaghan comprising of 15 no. wind turbines, a permanent 220Kv on-site substation and associated infrastructure located at Lemanaghan and surrounding townlands, Co. Offaly. The Applicant is Lemanaghan Wind Farm Designated Activity Company.

As part of the planning process, OCC is asked to submit to An Coimisiún a report setting out the views of the local authority within a 10-week period.

Before submitting this report to An Coimisiún, Planning will present their draft report to the Councillors at the Council meeting on the **18th May 2026, however, this must go to the CPG meeting the Friday before for agenda approval.**

Therefore, can you please review the submitted documentation (link below) and **provide your comments on the proposal by Friday 1st May 2026.**

All submitted documentation can be viewed at https://www.pleanala.ie/en-ie/case/324161
If you wish to discuss this further, please contact James Condron.
Please also keep a note of the hours spent compiling your reports.

Report from Birr Municipal District is as follows:

No objection to the proposed development, subject to the following Planning Conditions, which for clarity have been categorised as follows:

Section 1 - Planning Conditions of a generic nature.
Section 2 - Planning Conditions with respect to haulage routes.
Section 3 - Planning Conditions with respect to light-duty road maintenance by Municipal Districts.
Section 4 - Planning Conditions with respect to road survey and road surface remedial works.
Section 5 - Planning Conditions with respect to a bond for haulage routes.

SECTION 1 - PLANNING CONDITIONS OF A GENERIC NATURE.

Planning Condition: – Visibility and Safe Sight Distances:
The safe sight distances as detailed on the submitted entrance drawings shall be implemented and maintained free of obstruction throughout the lifecycle of the project/development.
Reason: In the interest of public safety.

Planning Condition: – Surface Water:
All surface water generated within the site shall be collected and disposed of on site, and in accordance with the submitted surface water management documentation. No surface water shall be allowed to run out onto the public road.
Reason: In the interest of preservation of the public road, in the interest of keeping surface water off of the public road in accordance with Section 76 of the Roads Act 1993, and in the interest of public safety.

Planning Condition: – Ground Water:
The development shall not be permitted to bring about an increase in the elevation of the pre-existing ground water levels adjacent to public roads. Water shall be managed in accordance with the submitted water management documentation. No
Reason: In the interest of preservation of the public road and public safety.

Planning Condition: – Wheel-wash:
Each site exit shall be serviced with a wheel-wash facility. Each wheel-wash shall use a **pressurised water system** to effectively remove undesirables from the undercarriage, sides, and wheels of vehicles. Wastewater and silt from each wheel-wash shall be managed in an environmentally appropriate manner. Each wheel-wash shall be situated at least 50m from its associated site entrance, so that the washed vehicle will traverse a 50m stretch of bound macadam driveway prior to exiting onto the public road network, in accordance with a separate planning condition entitled "Surface of Site Access Lanes." A wheel-dip alone shall not be deemed to be an acceptable wheel-wash facility.
Reason: In the interest of preservation of the public road and public safety.

Planning Condition: – Pre-construction – Surfacing of Site Access Lanes:
Prior to the main HGV delivery phase of the development, each site entranceway and site access laneway shall be surfaced in a bound macadam material for a distance of 50m from the metalled edge of the public road. The macadam surface shall be kept washed and brushed by a vacuum-sweeper truck.
Reason: In the interest of keeping a wet limestone-based slurry (and dust in dry weather) from exiting vehicles being deposited on the trafficable surfaces and verges of the public road network, which is a known issue from developments of this nature.

Planning Condition: – Post-construction resurfacing of Public Roads at Site Entrances:
Following completion of civil and structural stage of the development, the developer shall resurface the public road adjacent to each site entrance, for a distance of 100m. This shall be carried out in close consultation the Offaly County Council's Roads Department and the Birr Municipal District office.
Reason: It is known that deterioration of the public road network at site entrances is likely to occur during a development of this nature, due the turning and braking of heavy goods vehicles.

Planning Condition: – Housekeeping:
All public roads affected by the development shall be kept free of loose materials, dust, mud, spillages, and debris. Any necessary measures to control this matter shall be put in place by the developer.
Reason: In the interest of public safety and orderly development.

Planning Condition: – Wildlife Act and Bird Nesting Season:
The planned removal of any trees, hedges, or other vegetation as part of this development shall only be permitted take place in accordance with the provisions of the Wildlife Act and in consideration of the Bird Nesting Season.
Reason: Preservation of natural heritage and compliance with the Wildlife Act.

Planning Condition: – Road Opening Licence:
No excavation of, or alterations to the public road network (which includes the metalled surface, roadside verges, hard shoulders, entrances, roadside drains, kerbs, footways, road-signs, lamp-posts, barriers, etc.) shall take place without having obtained a valid Road-Opening Licence through the online MapRoad system in advance.
Reason: Preservation of the integrity of the public road and public safety.

Planning Condition: – Temporary Traffic Management (TTM) for Construction Phase:
The applicant shall ensure that site-specific Temporary Traffic Management (TTM) Plans are designed and installed to cater for the various phases of the project that have an impact upon or interaction with the public road network. Items that may be considered along with the General Principles of Prevention, could include, but not exclusively, some of the following:

- The prevailing traffic speeds and traffic volumes. Busy commuter routes.
- Horizontal and vertical alignments of the road(s). Visibility. Obstacles. Undulations.
- Presence of existing entrances in the vicinity/ existing turning movements/ existing slow-moving traffic areas.
- Grass verges – shall be kept in check by the developer to ensure that TTM signage is visible at all times.
- Appropriate TTM Plan and risk assessments shall be in place for all activities on the public roads.
- Housekeeping: All public roads affected by the development shall be kept free of loose materials, dust, mud, spillages, and debris.
- For excavation works at site entrances – the safety zone requirements and available residual road widths shall be considered as part of the Temporary Traffic Management Design Process.
- The impact that (i) queuing of delivery vehicles on the road before entry to the site, and (ii) slow-moving vehicles exiting the site, could have on traffic safety.
- The Provision of Variable Message Signs (VMS) for the duration of the project, or at specific phases of the project.

Reason: Public safety and compliance with Chapter 8 of the Traffic Signs Manual 2019.

Planning Condition: – Road Safety Audit:
The development shall be in accordance with the recommendations of the submitted Road Safety Audit.
Reason: Public safety.

Planning Condition: – Restricted Routes:
Heavy goods vehicles to and from the site shall primarily use the National Secondary road network followed by the Regional road network. HGV deliveries to and from the site shall not be permitted to use any public roads or bridges which have a weight restriction.
Reason: In the interest of preservation of the public road network and public safety.

SECTION 2 - PLANNING CONDITIONS WITH RESPECT TO HAULAGE ROUTES

Planning Condition: – Haulage Route from Kilsaran Quarry:
Section "3.4.2 Deliveries of Stone and Ready-Mix Concrete from Quarries" of "Appendix 4-4 Construction and Environmental Management Plan - F - 2026.03.19 – 200804" identifies the following public roads as part of the route from Kilsaran Quarry to Site Entrance 2:

> The proposed route for HGVs from each identified quarry to the closest relevant site entrance location is provided below. Deliveries of stone and ready-mix concrete for use in construction of the Proposed Project, are discussed in further detail in Chapter 15 of this EIAR.
>
> Kilsaran Quarry, Tullamore Co. Offaly
>
> HGVs will depart from Kilsaran Quarry in the townland of Bunaterin, Co. Offaly and turn right onto the N52 national road. They will travel for approximately 650m before turning right onto the R357 regional road. The HGVs will travel in a northwest direction for 5.9km before turning right onto L6027 for 1.9km then left onto the L6051 local road. After travelling north along the L6051 local road for 6.5km the HGVs will turn right onto the R436 regional road and travel 1.1km to Site Entrance 2 where they will turn left to enter the Proposed Wind Farm.

The above route is under no circumstances to be used for HGV traffic of any description. The local road network which spans between the R-357 (Blueball to Cloghan road) in the townland of Lea More, through Pollagh Village, and continues to the R-436 at Lemanaghan Crossroads (on the Ferbane to Ballycumber road) is not suitable for HGV traffic as it is mainly a narrow bog-rampart road, and there is a masonry arch canal bridge "Plunkett Bridge" in Pollagh village which would not only be un-negotiable for HGV traffic due to its geometry, but would also be prone to accidental damage from HGVs.
HGV traffic from *Kilsaran Quarry* shall use the R-357 Regional road from Blueball to Cloghan, then the N-62 Cloghan to Ferbane, then the R-436 Ferbane towards Ballycumber.
Reason: Road safety, preservation of road structure, preservation of Plunkett Bridge.

Planning Condition: – Haulage Route from McKeown's Sand and Gravel:
Section "3.4.2 Deliveries of Stone and Ready-Mix Concrete from Quarries" of "Appendix 4-4 Construction and Environmental Management Plan - F - 2026.03.19 – 200804" identifies the following public roads as part of the route from McKeon's Sand and Gravel to Site Entrance 1:

> McKeon's Sand and Gravel, Culliaghbeg, Co, Roscommon
>
> HGVs will depart from McKeon's Sand and Gravel in the townland of Culliaghbeg, Co. Roscommon and turn right onto the R357 regional road. After travelling southeast for 15.7km, the HGVs will turn left onto the L3004 local road and travel east for approximately 8.3km. The HGVs will than turn left onto the N62 national road and travel north for 3.1km to Site Entrance 1 where they will turn right to enter the Proposed Wind Farm.

The section of the above route from Mullaghatour cross (R357) through Belmont village, and on to Ferbane, shall under no circumstances be used for HGV traffic as it is not suitable for HGV traffic.
HGV traffic from *McKeon's Sand and Gravel* shall utilise the R-357 Regional road from Shannonbridge to Cloghan, then the N-62 from Cloghan through Ferbane.
Reason: Road safety and preservation of road structure.

Planning Condition: – Haulage Route from John Gannon Concrete:
Section "3.4.2 Deliveries of Stone and Ready-Mix Concrete from Quarries" of "Appendix 4-4 Construction and Environmental Management Plan - F - 2026.03.19 – 200804" identifies the following public roads as part of the route from John Gannon Concrete to Site Entrance 2:

> John Gannon Concrete, Kilbeggan Co. Westmeath
>
> HGVs will depart from John Gannon Concrete in the townland of Toorlisnamore, Co. Westmeath and, to access the site via Site Entrance 2, they will turn right on the R389 regional road and travel south for approximately 3.4km before turning right on the R446 regional road. They will continue in a northeast direction for 500m and then turn left onto the R436 regional road. After travelling southeast for 18km the HGVs will reach Site Entrance 2 and turn right into the Proposed Wind Farm.

The HGV haulage route for John Gannon Concrete as proposed above, which relies upon a regional road network, shall be utilised without deviation for the duration of the development.
Reason: Road safety and preservation of road structure.

SECTION 3 - PLANNING CONDITIONS WITH RESPECT TO LIGHT-DUTY ROAD MAINTENANCE BY MUNICIPAL DISTRICTS

Planning Condition: – Light-duty Road Maintenance by Municipal District of Birr - Annual Contribution:
To facilitate the expected extra light-duty road maintenance by the Municipal District of Birr (in the form of pothole repairs by the patching-unit crew and water-cut repairs by the JCB crew) which will be required as a result of additional HGV traffic on the public roads servicing the development, the developer shall pay to the Planning Authority a Financial Contribution as a Special Contribution under Section 48(2)(c.) of the Planning and Development Act 2000, as amended, in respect of light road maintenance of these roads.
The contribution shall be paid annually, with the first payment within 3 months from the date of this grant of planning permission or in such payments as the Planning Authority may facilitate.
The amount of the contribution shall be €20,000 per annum.

Kilsaran Quarry: Kilsaran Quarry to Blueball, to Cloghan, to Ferbane, to Site Entrance No.2 = 34.6km.
McKeon's sand and Gravel: County boundary in Shannonbridge, to Cloghan, To Ferbane, to Site Entrance No.1 = 22.8km.

Note: *John Gannon Concrete: This route is solely via the R-436 through the Municipal District of Tullamore. It extends for 13.7km from Site Entrance No.2 to the Offaly/Westmeath County Boundary at Ballickmoyler. Please refer to separate Planning Condition.*

The figure of €20,000 is calculated as follows:
Expected additional site visits to the Kilsaran Quarry and McKeon's Sand and Gravel routes, which together equate to 57.4km of public road within the Municipal District of Birr.
Expect a visit every fortnight for a full-day (8 hours) by either the JCB crew or the Patching-unit crew. Say 25 visits per year.
4 Men on the crew for 8 hours = 32 man-hours per visit.
32 man-hours @ €25/hr = €800 per visit.
€800 per visit x 25 visits per annum = €20,000 per annum
Note:
Traffic Management supply and install – no charge. Patching-unit equipment hire – no charge. JCB hire – no charge. Van hire – no charge. Materials supply (tar, chippings, broken stone) – no charge.
Reason: In the interest of preservation of the public road condition.

Planning Condition: – Light-duty Road Maintenance by Municipal District of Tullamore - Annual Contribution:
To facilitate the expected extra light-duty road maintenance by the Municipal District of Tullamore (in the form of pothole repairs by the patching-unit crew and water-cut repairs by the JCB crew) which will be required as a result of additional HGV traffic on the public roads servicing the development, the developer shall pay to the Planning Authority a Financial Contribution as a Special Contribution under Section 48(2)(c.) of the Planning and Development Act 2000, as amended, in respect of light road maintenance of these roads.
The contribution shall be paid annually, with the first payment within 3 months from the date of this grant of planning permission or in such payments as the Planning Authority may facilitate.
The amount of the contribution shall be €5,000 per annum.
John Gannon Concrete: This route is solely via the R-436 through the Municipal District of Tullamore. It extends for 13.7km from Site Entrance No.2 to the Offaly/Westmeath County Boundary at Ballickmoyler.

Note: *Kilsaran Quarry: Kilsaran Quarry to Blueball, to Cloghan, to Ferbane, to Site Entrance No.2 = 34.6km.*
McKeon's sand and Gravel: County boundary in Shannonbridge, to Cloghan, To Ferbane, to Site Entrance No.1 = 22.8km. Please refer to separate Planning Condition.

The figure of €5,000 is calculated as follows:
Expected additional site visits to the *John Gannon Concrete* route, which equates to 13.7km of public road within the Municipal District of Tullamore.
Expect a visit every fortnight for two hours by either the JCB crew or the Patching-unit crew. Say 25 visits per year.
4 Men on the crew for 2 hours = 8 man-hours per visit.
8 man-hours @ €25/hr = €200 per visit.
€200 per visit x 25 visits per annum = €5,000 per annum
Note:
Traffic Management supply and install – no charge. Patching-unit equipment hire – no charge. JCB hire – no charge. Van hire – no charge. Materials supply (tar, chippings, broken stone) – no charge.
Reason: In the interest of preservation of the public road condition.

SECTION 4 - PLANNING CONDITIONS WITH RESPECT TO ROAD SURVEY AND ROAD SURFACE REMEDIAL WORKS

Planning Condition: – Road Pre-Condition Survey:
Prior to commencement of any construction work on the development, a Road Condition Survey of the public road network in Offaly which is affected by the development shall be carried out by a suitably qualified professional organisation and submitted to the Planning Authority for written approval. The survey shall include a Video Survey, Photographic Survey, Road Condition Survey, and a Falling Weight Deflectometer (FWD) Survey.
Reason: To establish the condition of the public road along the main haulage routes before being impacted by the development.

Planning Condition: – Road Post-Condition Survey:
Within 3 months of completion of the development, a Road Condition Survey of the public road network in Offaly which was affected by the development shall be carried out by a suitably qualified professional organisation and submitted to the Planning Authority for written approval. The survey shall include a Video Survey, Photographic Survey, Road Condition Survey, and a Falling Weight Deflectometer (FWD) Survey.
Reason: To establish the condition of the public road along the main haulage routes after being impacted by the development.

Planning Condition: – Major Road Deterioration and Full-width Restoration:
Where the Local Authority determines that a significant deterioration has occurred in the condition of public road network as a result of the traffic to/from the development, as evidenced by comparison of the "before" and "after" Road Condition Surveys, the developer shall be held accountable for the costs of the necessary full-width road restoration repairs in accordance with the relevant Department of Transport and Transport Infrastructure Ireland design guidelines. Such full-with restorations on Local and Regional roads would typically entail road recycling, addition of new materials with or without bituminous materials, and double surface dressing, whilst on National secondary roads the restorations may include removal via road-planer of the deteriorated material and the application of new layers of bituminous materials.
Reason: In the interest of preservation of the public road condition.

Offaly County Council **Birr Municipal District**

SECTION 5 - PLANNING CONDITIONS WITH RESPECT TO A BOND FOR HAULAGE ROUTES

Planning Condition: - Bond for Haulage Routes:

A significant portion of the haulage route roads are founded on peat. In the event that Offaly County Council is required to intervene and carry out repair works to the haulage routes, it is reasonable that a bond be in place to cover same. The bond shall be in place prior to commencement of construction works on the development. The value of such a bond is €2,366,000. Calculated as follows:

Distance of Haulage Routes for Concrete and Granular Stone Materials:
Kilsaran Quarry: Kilsaran Quarry to Blueball, to Cloghan, to Ferbane, to Site Entrance No.2 = 34.6km.
McKeon's sand and Gravel: County boundary in Shannonbridge, to Cloghan, To Ferbane, to Site Entrance No.1 = 22.8km.
John Gannon Concrete: This route is via the R-436 through the Municipal District of Tullamore and extends for 13.7km from Site Entrance No.2 to the Offaly/Westmeath County Boundary at Ballickmoyler.
The total distance of haulage route for concrete and stone materials is 71.1km. Say 70km for round figures.

Expected Defective Distange:
It may be reasonable to expect that 10% of the haulage route could become defective as a result of the development.
Therefore, the distance for calculation proposes is 7km, or 7,000m.

Width:
Regional road widths vary from 6m to 8m.
National secondary road widths vary from 8m to 14m.
For the purposes of calculation an average road width of 8m will be used.

Area of Road Surface:
7,000m x 8m = 56,000m2

Road Resurfacing Treatments, and applicable Rates:
National-Secondary Roads: Base-course macadam and Surface Course Macadam. Cost of €55/m2.
Regional Roads in Urban areas: Base-course macadam and Surface Course Macadam. Cost of €55/m2.
Regional Roads in Rural areas on reasonable foundations: Recycle, base-course macadam, double-surface dressing. Cost of €40/m2.
Regional Roads in Rural areas on poor foundations: Recycle, with/without addition of granular materials, double-surface dressing. Cost of €30/m2.

Breakdown of Resurfacing Treatments:
Say 35% of the *Area of Road Surface* will require Base course and surface course macadam @ €55/m2: 0.35*56,000*55 = €1,078,000
Say 35% of the *Area of Road Surface* will require for Recycling, base-course macadam, and double surface dressing, at €40/m2: 0.35*56,000*40 = €784,000
Say 30% of the *Area of Road Surface* will require Recycling and double surface dressing, at €30/m2: 0.30*56,000*30 = €504,000

Total Value of Bond:
€2,366,000. i.e. the sum of €1,078,000 + €784,000 + €504,000.

Reason: Preservation of the public road network.

----- **End of Proposed Planning Conditions** ------

Important Notes to Planning Department:
Please also refer to reports from:
- OCC's Roads Department – in relation to the impact of the development on the public road network; and
- Environment and Water Services Department – in relation to Water Supply, Wastewater Management, and other environmental matters.
- Transport Infrastructure Ireland – in relation to the impact of the development on National Secondary roads.

Report by:
Joe Dunican
Executive Engineer
Birr Municipal District

Approved by:
Brian Keenaghan
Senior Executive Engineer
Birr Municipal District

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