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Date: 21/05/2026

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
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Re: Objection to Case reference: PAX19.324161 Proposed development of 15 no. wind turbines, a permanent 220kV on-site substation, and associated infrastructure

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Dear Sir/Madam,

The following is an objection by the No To Derryadd Community Group to the aforementioned application.

As a community group who are also dealing with a similar planning application in Lanesboro Co. Longford by the same applicant, BNM, a lot of similar concerns we have in relation to bogs, biodiversity, water, heritage, etc, are also reflected in this application and it is imperative that such are highlighted to An Coimisiún Pleanála.

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PART 1 - INTRODUCTORY MATTERS

This observation is submitted pursuant to Section 37E(5) of the Planning and Development Act 2000 (as amended) and Article 68 of the Planning and Development Regulations 2001 (as amended). It concerns the Strategic Infrastructure Development application for 15 wind turbines with a blade tip height of 220 metres, a permanent 220kV onsite substation, and associated infrastructure across approximately 1,111 hectares (red line boundary) at Lemanaghan Bog, Co. Offaly.

The application is submitted under the Renewable Energy Directive III (Directive 2023/2413/EU) provisions transposed by the European Union (Planning and Development)(Renewable Energy) Regulations 2025 and is subject to completeness checking under s.37JA of the Planning Act. This observation does not dispute the general policy imperative for renewable energy. It asserts that specific, identified deficiencies in the submitted EIAR, NIS, and supporting documentation are of sufficient legal and factual weight to preclude a grant of planning permission on the application as made.

PART 2 - GROUND 1: HABITATS DIRECTIVE - INADEQUACY OF THE NATURA IMPACT STATEMENT AND FAILURE TO EXCLUDE ADVERSE EFFECTS ON SITE INTEGRITY

2.1 Legal Standard

Article 6(3) of Council Directive 92/43/EEC (Habitats Directive), as given domestic effect by Regulation 42 of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011), requires that An Coimisiún Pleanála, as competent authority, shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site. This obligation is conditioned on the application of the precautionary principle as stated by the Court of Justice of the European Union in Case C-127/02 *Waddenzee,* 2004, ECR I-7405: where doubt remains as to the absence of adverse effects on site integrity, the competent authority must refuse consent.

The CJEU in Case C-461/17 *Holohan v An Bord Pleanála* ,2019, confirmed that an NIS must identify every aspect of the plan or project which can, by itself or in combination with other plans or projects, affect the conservation objectives of the designated site, and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the works proposed on the protected site concerned.

2.2 Deficiency: Incomplete Identification of European Sites Affected

The NIS restricts its Stage 2 Appropriate Assessment to two European sites:

- River Shannon Callows SAC (000216)
- Middle Shannon Callows SPA (004096)

The following European sites within the Zone of Influence are screened out at Stage 1 without adequate justification:

Clara Bog SAC (000540): Clara Bog is a raised bog SAC with active raised bog as a qualifying interest, located less than 4km from the proposed development. Photomontage VP04 in the submitted documentation is taken from Clara Bog Nature Reserve, which confirms visual connectivity. More materially, the hydro connectivity between the Lemanaghan catchment and the Clara Bog catchment via the Brosna River system has not been definitively excluded. The NIS, at Table 4-1, notes Clara Bog SAC as a relevant European site but fails to demonstrate, with complete and definitive scientific findings, that catchment scale hydrological pathways cannot transmit construction phase sediment, dissolved organic carbon, or altered drainage regimes into the Clara Bog catchment. The screening rationale cites distance and existing IPC licence controls as sufficient basis for screening out. Neither of these factors constitutes objective scientific evidence capable of excluding hydrological connectivity.

Fin Lough (Offaly) SAC (000573): Located approximately 7km from the turbine cluster. The NIS screening treatment does not address drainage network connectivity via the Lemanaghan Stream system.

Lough Ree SAC (000440) and Lough Ree SPA (004064): Downstream connectivity in the Shannon catchment is not addressed in the context of potential peat laden runoff during construction, which could affect water quality and migratory fish passage along the Shannon corridor.

2.3 Deficiency: Residual Adverse Effects Cannot Be Excluded

The NIS, at Section 7, concludes no residual adverse effects on site integrity for either the River Shannon Callows SAC or the Middle Shannon Callows SPA. This conclusion is not supported by complete, precise, and definitive findings in the following respects:

Ornithology/SPA: The Middle Shannon Callows SPA's qualifying bird species include Whooper Swan, Bewick's Swan, White fronted Goose, and various wader species. The site is located approximately 3.5km to 6km from the nearest proposed turbines. The NIS relies on Collision Risk Modelling (Appendix 9 to NIS; Appendix 7-6 to EIAR) but the collision risk modelling tool applied (Band Model/stochastic model) is constrained by the quality of flight line data. The NIS acknowledges at Section 6.1.1 that flight lines for whooper and Bewick's swans were recorded transiting through the Proposed Project site. The NIS concludes that residual collision risk for swans is "negligible" following the proposed mitigation of radar activated curtailment. Radar curtailment as a condition precedent

to approval is not the same as removal of adverse effects: it is a mitigation measure whose efficacy depends entirely on post consent operational management.

Under *Holohan*, mitigation measures cannot substitute for definitive evidence that adverse effects are excluded at the consent stage. The NIS does not contain independent validation of the proposed radar-curtailment system's detection rates for low flying swans in conditions of poor visibility, which is precisely the condition under which Bewick's and Whooper swans transit the Callows in autumn/winter. The conclusion of no adverse effect on site integrity therefore rests on unvalidated mitigation rather than scientific certainty.

SAC Water Quality: The NIS at Section 6.2.1 addresses deterioration of water quality. The site's drainage discharges into the Lemanaghan Stream and subsequently into the River Brosna, which connects to the Shannon. The NIS relies on the Surface Water Management Plan (Appendix 6 to NIS; Appendix 4-6 to EIAR) as the primary mitigation for construction-phase water quality impacts. However, the NIS does not provide independent chemical analysis data capable of establishing baseline dissolved organic carbon, suspended solids, and nutrient levels in receiving watercourses for comparison against post construction scenarios. The laboratory report at Appendix 9-2 of the EIAR provides some baseline water chemistry data, but the NIS does not cross reference this data to establish impact thresholds. The conclusion that water quality impacts on SAC qualifying interests can be excluded is therefore not substantiated by the scientific standard required under *Waddenzee* and *Holohan*.

PART 3 - GROUND 2: ACTIVE RAISED BOG - PRIORITY HABITAT UNDER ANNEX I OF THE HABITATS DIRECTIVE

3.1 Factual Basis

The NIS at Section 3.1.1 and the EIAR Chapter 6 (Biodiversity) acknowledge the presence of intact raised bog within the Proposed Project site. The NIS at Plate 3-6 confirms the photographic presence of intact raised bog within the application boundary. The EIAR Chapter 8 (Land, Soils and Geology) describes the site as consisting of "bare cutaway peat, revegetated bare peat, degraded raised bog, scrub, low woodland and remnants of high bog."

Active raised bog (EU Habitats Directive Annex I Habitat Code 7110) is a Priority Habitat, affording it the highest level of protection under EU law. Any development that directly or indirectly damages active raised bog requires consideration under Article 6(4) of the Habitats Directive as a derogation requiring imperative reasons of overriding public interest and compensatory measures.

3.2 Legal Consequence

The application does not contain a specific mapping exercise establishing the precise extent and condition of all active raised bog habitat within the 1,111 hectare application boundary. The detailed botanical survey report (Appendix 6-3 to EIAR) and the NIS at Section 3.1.1 identify habitat types but the application relies on the site being "predominantly" cutaway bog without establishing the full extent of any residual Priority Habitat. This is a material failure: if any active raised bog within the red line boundary is directly affected by turbine foundations, access roads, drainage infrastructure, or peat deposition areas, the project cannot be consented under Article 6(3) and must proceed, if at all, only under Article 6(4) derogation conditions.

The Peat and Spoil Management Plan (Appendix 4-3 to EIAR; Appendix 5 to NIS) identifies four borrow pits and extensive peat deposition areas. The interaction between these ground-disturbing works and any residual active raised bog habitat has not been adequately assessed.

PART 4 - GROUND 3: WATER FRAMEWORK DIRECTIVE - DETERIORATION OF WATER BODY STATUS

4.1 Legal Standard

Article 4(1)(a)(i) of Directive 2000/60/EC (Water Framework Directive), as given domestic effect by the European Communities (Water Policy) Regulations 2003 (S.I. No. 722 of 2003), imposes a legal obligation on Member States to prevent deterioration of the status of all bodies of surface water. The CJEU confirmed in Case C-461/13 *Bund für Umwelt und Naturschutz Deutschland,* 2015, (Weser) that "deterioration" of a water body status class constitutes a breach of Article 4(1)(a)(i) regardless of any policy benefit the project may confer.

4.2 Identified Deficiencies

EIAR Chapter 9 (Water) and **Appendix 9-3 (WFD Compliance Assessment Report)** are the principal documents addressing WFD compliance. The following deficiencies are identified:

(a) Classification of receiving watercourses: The WFD Compliance Assessment at Appendix 9-3 must establish the current ecological and chemical status classification of all receiving watercourses under the Third Cycle River Basin Management Plan 2022-2027. The application documents do not confirm whether the Lemanaghan Stream and the River Brosna are currently classified at "good," "moderate," or lower status, nor do they confirm whether any are in a WFD "heavily modified" category. If any receiving watercourse is already at less than good status, the non-deterioration obligation is stricter because the absolute prohibition on further deterioration applies at every class boundary.

(b) Construction phase runoff from peat disturbance: The site involves 17.1km of new permanent internal roads, 4 borrow pits, extensive peat deposition areas, turbine foundations (gravity and bored pile types), and drainage infrastructure across 1,111 hectares of predominantly peat substrate. Construction phase release of peat laden runoff, elevated suspended solids, and increased dissolved organic carbon loads into receiving watercourses constitutes a potential deterioration pathway. The Surface Water Management Plan (Appendix 4-6 to EIAR) relies principally on silt traps and settlement ponds as mitigation. No quantified modelling of sediment load inputs versus receiving watercourse assimilative capacity is presented. The WFD Compliance Assessment cannot therefore demonstrate to the required legal standard that deterioration will not occur.

(c) Hydrological impact of foundation works: Turbine T05 and several others are located on degraded raised bog with high water table conditions. Gravity and bored pile foundations (see Drawings 200804-21 and 200804-22) will intercept the peat profile and may alter local groundwater drainage pathways. The EIAR Chapter 9 addresses this issue but the Flood Risk Assessment at Appendix 9-1 does not model the cumulative effect of 15 foundation structures on the local shallow groundwater regime and its discharge to surface watercourses.

PART 5 - GROUND 4: PEAT STABILITY - INADEQUACY OF RISK ASSESSMENT

5.1 Context

The Derrybrien Wind Farm peat slide of October 2003 (approximately 450,000 cubic metres of peat mobilised during construction on blanket bog) remains the defining precedent for peat stability risk assessment in Irish wind farm applications. The Derrybrien peat slide caused catastrophic ecological damage to the River Owendalulleegh and downstream systems. Investigations confirmed that the Irish Wind Energy Guidelines and predecessor guidance had not adequately addressed peat stability risk on deep peat substrates.

5.2 Identified Deficiencies in Appendix 8-1 (Peat Stability Risk Assessment)

The Peat Stability Risk Assessment methodology must comply with the current guidance: *Bord na Móna / Tobin Consulting Engineers, Bog Slide Risk Assessment Guidance 2006* and updated guidance in the *Peatland Council/SEAI: Wind Energy Development on Peatland Guidance 2011*. Additionally, Circular Letter PL 11-02 issued by the Department of the Environment in 2011 requires that a qualified peat stability expert certify the assessment.

The application includes a Peat Stability Risk Assessment at Appendix 8-1 of the EIAR. The following concerns arise from the available information:

(a) The site is former industrial cutaway bog under IPC Licence P0500-01. The structural properties of cutaway peat (including residual peat depths, degree of humification, and shear strength parameters) are specific to post extraction conditions and differ materially from blanket bog. The Peat Stability Risk Assessment must demonstrate that peat depth surveys with sufficient spatial resolution have been carried out across all turbine foundation, access road, borrow pit, and drainage infrastructure footprints. The EIAR Chapter 8 references peat investigations but does not confirm the spatial coverage of peat depth probing.

(b) Four borrow pits are proposed. Borrow pit excavation on cutaway bog involves removal of the upper peat layer, which may destabilise adjacent peat slopes or alter drainage pathways. The interaction between borrow pit works and peat stability in adjacent areas is not addressed in the available summary information.

(c) The intersection of bored pile foundation works with the peat profile (Drawing 200804-22) creates a specific risk of water entry, peat mobilisation along pile shafts, and alteration of local peat drainage, particularly during construction. This requires specific geotechnical assessment beyond the generic peat stability risk framework and is not apparent from the submitted documentation.

PART 6 - GROUND 5: SUBSTITUTE CONSENT APPLICATION - CONCURRENT UNRESOLVED PROCEEDINGS

6.1 Material Conflict

A substitute consent application for peat extraction and ancillary works from July 1988 to June 2020 within Lemanaghan Bog was submitted by Bord na Móna to An Coimisiún Pleanála on 12th September 2025 (Case Ref: SU19.323676). This application encompasses the majority of the Proposed Project site area. The substitute consent application includes a Remedial EIAR (rEIAR) and a Remedial NIS (rNIS).

6.2 Legal Implications

(a) The wind farm EIAR describes the baseline environment of the site by reference in part to the rEIAR and rNIS submitted for the substitute consent application (Planning Report, Section 3.3.1). However, the substitute consent has not yet been determined. The baseline environment described in the wind farm EIAR therefore rests on an assumed remedial scenario that has no planning or legal status. If the substitute consent is refused, or granted subject to conditions requiring substantial modification of the site's remedial programme, the baseline assumptions in the wind farm EIAR may be materially incorrect.

(b) The IPC Licence P0500-01 (Boora Bog Group) requires implementation of a Cutaway Bog Decommissioning and Rehabilitation Plan under Condition 10 of the licence. The wind farm application asserts that the rehabilitation plan will be implemented "irrespective of the consenting or construction of the Proposed Project." However, the wind farm infrastructure will directly occupy, modify, and in material respects make irreversible the rehabilitation potential of the land concerned. Permanent access roads, turbine foundations, and the 220kV substation compound will permanently sterilise areas designated in the Draft Rehabilitation Plan for peatland rehabilitation.

(c) Construction of the wind farm prior to determination of the substitute consent application would foreseeably compromise the EIA and AA processes attached to the substitute consent. An Coimisiún Pleanála cannot properly conduct the appropriate assessment for the wind farm application without certainty as to the consented baseline condition of the land.

PART 7 - GROUND 6: TURBINE T05 - NON-COMPLIANCE WITH OFFALY WIND ENERGY STRATEGY

7.1 Factual Position

The Planning Report at Section 3.2 and the Non Technical Summary acknowledge that Turbine T05 is located on the boundary of an area designated "Not Deemed Suitable for Wind Energy Developments" under the Offaly Wind Energy Strategy 2021-2027, which forms part of the Offaly County Development Plan 2021-2027.

Objective WE-O-3 of the OCDP states that wind energy developments in areas designated as "not deemed suitable" will not be supported.

7.2 Inadequacy of Justification

The applicant's justification that the overlap is "minor" and will not give rise to significant environmental effects does not address the planning policy non-compliance as a discrete ground. The Wind Energy Strategy designation is not a guideline or aspiration; it is a binding spatial designation in a statutory development plan. Policy non-compliance with a development plan wind energy strategy designation requires that the Commission, in exercising its function under s.37G of the Planning Act, have regard to the development plan and material considerations. The applicant has not demonstrated that the location of T05 within the "not deemed suitable" zone is justified by any specific material consideration capable of outweighing the statutory designation.

Furthermore, the application does not contain a redesign analysis demonstrating whether T05 could be relocated outside the "not deemed suitable" boundary without material reduction in the generating capacity of the project, or whether its removal would be a viable design alternative under the EIA Directive's requirement for consideration of reasonable alternatives (EIAR Chapter 3, Site Selection and Reasonable Alternatives).

PART 8 - GROUND 7: CULTURAL HERITAGE - LEMANAGHAN MONASTIC COMPLEX

8.1 Heritage Context

The Lemanaghan Monastic Complex is one of the most significant Early Medieval monastic settlements in the Irish midlands, associated with Saint Manchan (d. 664 AD). The Complex includes multiple recorded monuments on the Record of Monuments and Places (RMP) and is the subject of a dedicated assessment at Appendix 13-5 (Lemanaghan Monastic Complex Report) and Appendix 13-7 (The Archaeology of Lemanaghan Bog). The cultural heritage significance of this Complex and its surviving physical, visual, and cognitive landscape setting is exceptional.

Photomontage VP13 (Lemanaghan Monastic Site) and VP07 (St Manchan's Cemetery) in Volume 2 of the application confirm direct visibility of proposed turbines from these heritage assets.

8.2 Identified Deficiencies

(a) EIAR Chapter 13 (Cultural Heritage) and Chapter 14 (Landscape and Visual) must be assessed in combination with respect to the setting of the Lemanaghan Monastic Complex. The integrity of a heritage monument's setting is a material consideration under s.37G(1)(a) of the Planning Act and under the provisions of the National Monuments Act 1930 (as amended). The Lemanaghan Monastic Complex lies within the Proposed Project site boundary based on the application mapping. Any ground disturbance within the Complex's zone of archaeological potential requires a licence under s.26 of the National Monuments Act 1930.

(b) The photomontage from VP13 (Lemanaghan Monastic Site) shows direct visual intrusion by multiple turbines from within the monastic enclosure. The landscape and visual assessment must address, with specific methodology, the concept of "setting" as defined in the Department of Housing, Local Government and Heritage, *Architectural Heritage Protection Guidelines* (2011) and as applied in the Office of Public Works heritage assessment guidelines. The EIAR Chapter 14 LVIA methodology relies on landscape character area assessments but does not apply a specific setting impact methodology to scheduled/recorded monument viewpoints in accordance with the ICOMOS approach to setting assessment.

(c) The Zone of Theoretical Visibility (ZTV) analysis in the LVIA must confirm the full extent of visual impact from all recorded monuments and protected structures within 5km. The Cultural Heritage chapter at Appendix 13-2 lists recorded monuments within 5km outside the site but the LVIA does not systematically cross reference these with the ZTV to identify all heritage assets with direct turbine visibility.

PART 9 - GROUND 8: CUMULATIVE IMPACTS - INADEQUACY OF ASSESSMENT

9.1 Bellair Wind Farm

The Planning Report at Section 3.3 identifies the Bellair Wind Farm as at public domain stage with an indicative site location point 2.7km north of Turbine T10. This proximity is material for cumulative assessment. The NIS at Section 8.2 addresses cumulative ornithological impacts with Bellair at Table 8-3 using estimated predicted collisions per annum. However, Bellair Wind Farm's layout, turbine numbers, and dimensions are not fixed, and the cumulative collision risk modelling in the NIS therefore relies on unverified assumptions about a project that has not yet reached application stage. Under *Holohan*, cumulative effects assessment must be based on identifiable, quantified data; estimates based on unconfirmed project parameters are insufficient to constitute definitive findings.

9.2 IPC Licence Interactions

The cumulative assessment does not address the temporal overlap between:

- Wind farm construction (10 year permission sought);
- Substitute consent remedial activities (SU19.323676);
- Ongoing BNM IPC Licence decommissioning and rehabilitation obligations.

These three concurrent programmes of ground disturbance on the same land area present cumulative hydrological, peat stability, and ecological disturbance risks that have not been assessed as a combined scenario in the EIAR or NIS.

PART 10 - GROUND 9: CARBON BALANCE - FLAWED NET BENEFIT CLAIMS

10.1 The Peatland Carbon Context

Carbon Calculations at Appendix 11-2 to the EIAR are cited in support of the project's climate credentials. Peatlands are the most carbon dense terrestrial ecosystem in Ireland. The IPCC recognises that cutaway peatlands in active or passive rehabilitation represent a significant carbon sequestration opportunity. The National Peatlands Strategy and Peatland Climate Action Scheme provide a policy framework for prioritising peatland carbon recovery.

10.2 Deficiencies in the Carbon Assessment

(a) The carbon calculations must account for the permanent sterilisation of peatland rehabilitation potential in the footprints of: turbine foundations, access roads (17.1km new), borrow pits (4 no.), substation compound (c. 9,611m²), and peat deposition areas. These areas cannot be rehabilitated to active raised bog during the 35 year operational life and are unlikely to be fully rehabilitated after decommissioning. The carbon cost of permanent infrastructure on rehabilitable peatland is a "carbon debt" that must be fully quantified.

(b) The carbon calculations in Appendix 11-2 use a standard lifecycle carbon analysis framework for wind energy. They do not apply a peatland specific carbon accounting methodology (such as the IPCC Wetlands Supplement methodology) to the emission factors applicable to: peat disturbance during construction, altered peat drainage during operation, and deferred carbon sequestration due to infrastructure sterilisation. The net carbon benefit claimed for the project may be substantially overstated in the absence of this analysis.

PART 11 - GROUND 10: RENEWABLE ENERGY DIRECTIVE III - LIMITATIONS ON FAST TRACK PROCEDURES

11.1 REDIII Does Not Override Habitats Directive

The application invokes the Renewable Energy Directive III (Directive 2023/2413/EU), Article 6 of which provides for designated Renewable Energy Acceleration Areas (REAAs) and Article 16 of which provides for simplified procedures in certain circumstances. The EU (Planning and Development)(Renewable Energy) Regulations 2025 transpose these provisions.

However, Recital 57 and Article 16(1) of REDIII expressly state that the simplified procedures do not exempt projects from the requirements of the Habitats Directive and the Birds Directive. Article 6(3) and 6(4) of the Habitats Directive retain full legal force regardless of REDIII procedures. Any conclusion by An Coimisiún Pleanála that the climate imperative for renewable energy constitutes an "imperative reason of overriding public interest" (IROPI) sufficient to invoke Article 6(4) derogation must still demonstrate: (a) absence of alternative solutions; (b) adoption of compensatory measures; and (c) notification to the European Commission under Article 6(4) second subparagraph. None of these steps have been undertaken in the application as made.

11.2 Draft Wind Energy Guidelines 2019

The applicant relies throughout on the Draft Revised Wind Energy Development Guidelines 2019 for noise limits and setback distances. These guidelines have not been adopted and have no legal standing under s.28 of the Planning Act. Compliance with a document that has no statutory status cannot be treated as a material planning consideration in the applicant's favour. The applicable statutory guidelines remain the Wind Energy Development Guidelines 2006 (DoEHLG), under which the relevant noise limits and setback standards differ from the draft 2019 document. The noise and residential amenity assessment in EIAR Chapter 12 relies materially on the 2019 draft standards and must be reassessed against the 2006 statutory guidelines.

PART 12 - SUPPLEMENTARY OBSERVATIONS: VISUAL IMPACT AND RESIDENTIAL AMENITY

The 15 proposed turbines have a tip height of 220 metres. This represents an exceptional scale of built structure in a midlands landscape context. The LVIA (EIAR Chapter 14) addresses landscape character impacts but the photomontage series (Volume 2) from VP06 (Tullamore), VP04 (Clara Bog Nature Reserve), VP10 (Slieve Bloom Mountains), and VP20 (Hill of Uisneach) confirms the development will be visible from Uisneach — a nationally significant ceremonial landscape with recognised heritage values — and from the Clara Bog National Nature Reserve, where visual intrusion by industrial scale turbines is directly inconsistent with the ecological and amenity value of the protected site.

The visual impact on the Hill of Uisneach, while not itself a European site, is a matter of national cultural significance that constitutes a material consideration. The National Monuments Service designates Uisneach as one of the most important prehistoric ceremonial landscapes in Ireland. The LVIA's treatment of VP20 from the Hill of Uisneach must be evaluated against this heritage significance, not merely as a landscape character point.

PART 13 - CONCLUSION

Based on the above, An Coimisiún Pleanála is requested to:

1. Require the applicant to provide a supplementary NIS addressing Clara Bog SAC, Fin Lough SAC, and Shannon catchment downstream European sites in full Stage 2 assessment with definitive scientific findings on hydrological connectivity and ornithological impact pathways.
2. Require mapping of active raised bog (Annex I Priority Habitat Code 7110) across the full application boundary prior to assessment.
3. Require a quantified WFD impact assessment with modelled sediment and dissolved organic carbon loading against classified receiving watercourse assimilative capacity.
4. Require independent certification of the peat stability risk assessment to current guidance standards, with specific coverage of borrow pit interactions and bored pile foundation effects.
5. Defer determination of this application until the substitute consent application SU19.323676 has been determined, or require a comprehensive assessment of the baseline and impact scenario under both possible substitute consent outcomes.
6. Require the applicant to demonstrate that T05 is either consistent with the Offaly Wind Energy Strategy or provide the full redesign analysis demonstrating no reasonable alternative design avoids the "not deemed suitable" zone.
7. Require a formal archaeological setting assessment for the Lemanaghan Monastic Complex in accordance with ICOMOS heritage setting methodology.
8. Require a peatland specific carbon accounting analysis in accordance with the IPCC Wetlands Supplement methodology.
9. Assess noise and residential amenity impacts under the legally operative Wind Energy Development Guidelines 2006, not the legally inoperative Draft 2019 Guidelines.

We believe that the grounds set out above are individually and cumulatively of significant importance to require either refusal of planning permission or substantial further assessment before any determination can lawfully be made consistent with Article 6(3) of the Habitats Directive, Article 4 of the WFD, and the obligations imposed by the EIA Directive (Directive 2011/92/EU as amended by Directive 2014/52/EU) as transposed by the Planning and Development (Environmental Impact Assessment) Regulations 2018.

Kind Regards
Niall Dennigan
On behalf of - No To Derryadd Community Group