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RENEWABLE ENERGY PLANNING STATEMENT FOR THE PROPOSED LITTLETON WIND FARM, CO. TIPPERARY

Renewable Energy Planning Statement

Prepared for:

Littleton Wind Farm DAC



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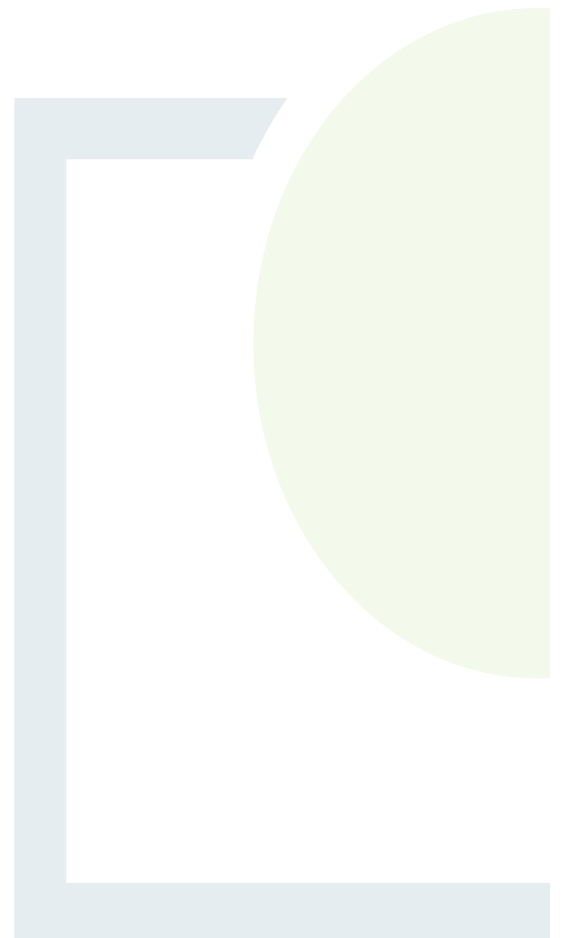
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Renewable Energy Planning Statement

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1. INTRODUCTION

This Renewable Planning Statement has been prepared by Fehily Timoney and Company (FT), on behalf of Littleton Wind Farm DAC (the Applicant), to accompany a Strategic Infrastructure Development (SID) application for a proposed wind energy project known as 'Littleton Wind Farm', located within the jurisdiction of Tipperary County Council.

This application is made under section 37E of the Planning and Development Act 2000, as amended, to An Coimisiún Pleanála following pre-planning discussions (ACP SID Pre-App Ref: 311587-21).

The Proposed Development is covered by the provisions of the Renewable Energy Directive III (Directive 2023/2413) as transposed by the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (SI No. 274/2025, and subsequently S.I. No. 426 of 2025) and as amended by S.I. No. 185 of 2026 (the "Renewable Energy Regulations"), and subject to Section 37JA of the Planning and Development Act, 2000, as amended. This Report fulfils the requirement for a Renewable Energy Designation Policy Statement and provides clear justification of the policy context for the Proposed Development as required to demonstrate the Completeness of the application (Appendix 2 of Circular CEPP 1/2025).

The Littleton Wind Farm proposal includes 11 no. turbines and associated ancillary infrastructure including an 110kV onsite substation. The project is of strategic importance, as it exceeds a 50MW capacity, as referenced within the requirements of Sections 37A(2) (a), (b), and (c) of the Planning and Development Act 2000, as amended.

The purpose of this Renewable Planning Statement is to assist An Coimisiún Pleanála in their determination of whether the Littleton Wind Farm proposal has been designed to deliver a sustainable development in accordance with relevant strategic and local planning policies and applicable guidance, appropriately assess the principle of development, and consider all other material considerations.

This report is structured as follows:

- **Section 2 - Site Description:** This section provides a description of the site, its context, and the relevant planning history;
- **Section 3 - Proposed Development:** This section describes all elements of the Proposed Development;
- **Section 4 - Planning Policy and Legislative Context:** This section outlines the national, regional and local planning policies and guidance relevant to the application site and proposal;
- **Section 5 - Planning Assessment:** This section considers relevant planning policy/guidance and provides an assessment of the principle of development and other relevant considerations;
- **Section 6 - Completeness Check:** List of planning application material in line with Article 16 (2) of RED III; and
- **Section 7 - Conclusion:** This section sets out our summary of the key points set and conclusions.

This Renewable Planning Statement forms part of the evidence base submitted as part of the planning application and should be read in conjunction with the Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS).

The Proposed Development assessed in this EIAR comprises the following elements:



- The 'Proposed Wind Farm' (also referred to in this EIAR as the 'Site');
- The 'Proposed Grid Connection' (also referred to in this EIAR as the 'GC');
- The 'Turbine Delivery Route' (also referred to in this EIAR as the 'TDR');
- The 'Biodiversity Enhancement and Management Plan Lands' (also referred to in this EIAR as the 'BEMP Lands');

1.1 Applicant

The prospective applicant's name at the time of commencement of pre-application consultation was Bord na Móna Powergen Ltd. Since the commencement of pre-application consultation a Joint Venture (JV) was created between SSE Renewables and Bord na Móna Powergen Ltd., a subsidiary of Bord na Móna plc (BnM) trading as BnM. Therefore, the application for the proposed Littleton Wind Farm is being made by Littleton Wind Farm DAC.

1.1.1 SSE Renewables

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

1.1.2 BnM

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

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



BnM has a long track record of developing energy projects, dating back to the development of the first generation of peat-fired power stations. In recent times, the business has gone through radical change, announcing the new “Brown to Green” strategy, committing to the cessation of peat harvesting, and focusing on developing climate solutions in renewable energy, sustainable waste management, carbon storage and biodiversity conservation. A key objective of this strategy involves using the land to continue to underpin Ireland’s energy independence by developing green, sustainable energy sources to assist with Ireland’s commitment to achieve 70% renewable electricity by 2030.

1.2 Statement of Authority

This Report has been prepared by Ida Wulff, reviewed by Robyn Nicholl and Conor Auld, and approved by Jim Hughes, both of Fehily Timoney and Company.

Ida Wulff is a Graduate Planner with Fehily Timoney and Company and holds a Masters’ degree in Planning and Sustainable Development, and a Bachelor’s degree in International Development from University College Cork. Ida has one years’ experience preparing EIAR chapter for a range of development types.

Robyn Nicholl is a Principal Planner with Fehily Timoney and Company and holds a MSc degree in Urban and Rural Design, and a BSc in Environmental Planning from Queens University, Belfast. She has worked in both public sector and private planning consultancy for over twelve years and has led many strategic projects both in the planning and environmental assessment disciplines, including a number of wind farm developments.

Conor Auld is a Principal Planner with a MSc in Urban and Rural Design and BSc in Environmental Planning from Queen’s University Belfast. Conor also holds an advanced Diploma in Planning and Environmental Law from The Honourable Society of King’s Inns. Conor has prepared several EIAR Chapters and assisted in EIAR management for wind farm developments throughout Ireland. Conor has in excess of 10 years professional planning experience.

Jim Hughes holds a BA in Public Administration from the University of Limerick, an MSc in Town Planning from Queen’s University Belfast and a HDip in Environmental Impact Assessment from University College Dublin. Jim has led major Irish projects in the planning, environmental assessment and permitting disciplines including many wind farm developments.



2. SITE DESCRIPTION

2.1 Site Location and Surrounding Context

The Proposed Development (comprising Wind Farm Site, BEMP lands, and Turbine Delivery Route) is located within the jurisdiction of Tipperary County Council. The Wind Farm Site comprises a land area of 1,177 hectares (ha), and is located within 3 bogs, namely Littleton Bog, Longford Pass (Popes Bog) and Ballybeg Lanespark Derryvella Bog, which fall within the townlands of Longfordpass North Longfordpass South, Leigh, Bawnreagh, Clonoura, Noard, Derryhogan, Derryvella, Ballybeg, Lanespark, Newhill and Killeen, County Tipperary. Refer to Figure 4.1 - Site Location, contained within Volume 4 of the EIAR, for the proposed application development boundary.

The majority of settlements closest to the site are situated to the west of the site. Ballinunty is the nearest, c.2 km southeast of the proposed turbine array. The village of Gortnahoe lies c. 2.5 km northeast of the site at its closest point, while New Birmingham is situated c. 2 km to the east. The small centre of population of Ballysloe is also located to the east, at just over 3 km from the nearest turbine. Littleton and Twomileborris are the only settlements within the central study area situated to the west of the site, located c. 2.6 km and c. 2 km from the proposed turbine array, respectively. The village of Killenaule lies c. 4 km southeast of the site and Horse and Jockey is c. 4.7 km to the west. Urlingford is located c. 6.8 km north of the site and Johnstown c. 10.5 km to the north. The most notable settlements within the area are Thurles and Cashel. Thurles is located c. 9 km west of the site, while Cashel is c. 17 km to the southwest.

The Wind Farm Site is located in a sparsely populated rural context. There are 101 no. properties (80 no. residential, 16 no. mixed use, and 5 no. commercial) within 2 km of the turbine array as shown in Figure 4.5, Volume 4 of the EIAR. The closest residential receptor is 851 m to T11. The closest residential receptor to the substation is approximately 475m away.

The elevation of the Site ranges from approximately 120-130m altitude above sea level. A large proportion of the Site is regenerating cutaway (heath, scrub, woodland) but includes open areas with large bodies of open water. Areas of remnant high bog occur scattered along the boundary of the proposed Wind Farm.

2.1.1 Existing Land Use and Site Context

The Proposed Wind Farm Site boundary extends for approximately 10km from north to south and ranges between 1km (at north end) and 2km (at south end) from east to west.

The Tailte Eireann Land Cover database for Ireland (based on interpretation of satellite imagery and national vector mapping data) identifies the following land cover types within and surrounding the Site: peat bogs, moors and heath, coniferous forestry, mixed forestry, land principally occupied by agriculture, non-irrigate land, pastures and transitional woodland scrub. Land use at the site is dominated by peat bog with smaller pockets of forestry and land used for agricultural purposes. Littleton is generally surrounded by farmland but there are extensive conifer plantations outside the eastern and western boundaries.

There is an extensive network of roads in the area. The M8 motorway and the R639 run to the northwest/west of Littleton bog. The R689 and R690 run to the east and the L4101 runs to the south. The main site access points are at the north and south ends of the bog adjacent to the railway line.



Due to the historic peat extraction activities at the Site, the bogs have been artificially drained in order to lower the peat water table. Drainage ditches were inserted into the upper surface of the bogs at different stages. Littleton Bog was the first bog within the Site to be cleared and drained in 1941. Longfordpass Bog (Popes Bog) was drained in 1947 whilst Ballybeg Lanespark Derryvella Bog was drained in 1968.

Drainage of the Site and the wider Littleton Bog Group is currently operating under licence from the EPA (Integrated Pollution Control Licence Ref. No. P0499-01). The drainage system has been operating in accordance with this existing Integrated Pollution Control licence, with all drainage water being discharged from the bogs passing through an appropriately designed silt pond treatment arrangement prior to discharge.

In 2018, Bord na Móna produced Cutaway Bog Decommissioning and Rehabilitation Plans for the Longfordpass, Littleton and Lanespark bogs located within the Application Site in accordance with Condition 10 of the IPC licence. Rehabilitation Phase 1 works were completed in Littleton, Longfordpass, Lanespark Bogs and the nearby Ballybeg and Derryvella Bogs between 2018-2021 with extensive drain-blocking and hydrological management. The key objective of peatland rehabilitation is environmental stabilisation. The rehabilitation works that have been completed and commenced in Phase 1 are described in the Cutaway Bog Decommissioning and Rehabilitation Plans (Appendix 2-1) and in Section 2.2 of Chapter 2. These works have created localised flooded areas within the site, adjacent to the drain blocking. The conditions created by the Phase 1 rehabilitation measures which have been implemented form part of the hydrological baseline and as such form an inherent component of the baseline environment considered in the impact assessment.

Currently surface water (or runoff water) is drained from the Site via a network of field drains typically spaced at 15 to 20m intervals, piped drains, main drains, headland drains, and silt ponds. Drainage of the Site was historically assisted by pumping stations located within the Site. .

Please refer to Chapter 9 - Hydrology, Hydrogeology and Water Quality, Volume 2 of the EIAR which details the existing drainage on site.

A detailed description of the history and background of the existing bog site and its associated historical operations is contained within Chapter 2 - Background to the Proposed Development, Volume 2 of the EIAR.

2.2 Planning History

A desktop planning history search for the Proposed Wind Farm site was carried out using the available online planning resources of Tipperary County Council and An Coimisiún Pleanála. It presents a systematic review, first of the Application Site and Applications that have occurred within the redline boundary of same, before presenting Applications which adjoin this redline boundary, and lastly presenting Applications that have taken place within 500m of the redline boundary. This is in order to present a full, and thorough understanding of Development that has occurred both onsite and within the immediate environs. Tables 2-1 to 2-3 below presents the planning history of the subject site.

Applications determined within the past 5 years are listed below. Applications deemed to be invalid or withdrawn by the Local Authority were omitted as these permissions are deemed as not being built out.



Table 2-1: Littleton Planning Search (On Site Applications)

Reg Ref	Development Description	Status	Decision Date
On Site Applications (excluding grid connection as this does not form part of the redline boundary)			
ACP-324359-26.	Substitute Consent to regularise peat extraction and ancillary activities at Longfordpass Bog, Littleton Bog, Lanespark Bog and Derryvella Bog, Co. Tipperary.	Live application	Live application
2560154	a recreational shared cycle and walkway to connect into the existing Loch Dhoire Bhile Loop - a) the delivery of a shared cycle and walkway on Bord na Móna lands. This will include the repurposing of 602 meters of existing former rail bed, 2859 meters along existing bog headlands / former high fields, and 721 meters along pre-existing machine access routes, b) the construction of car and / or bicycle parking facilities at a number of gateway locations along the proposed route and the provision of EV charging spaces at the gateway locations. This will include; i. 2 no. Type 2 Gateways, ii. 1 no. Type 4 Gateway, iii. 1 no. Minor Rest Points, c) Upgrade works to 1 no. local access road crossing and 4 no. agricultural access crossings, d) the erection of wayfinding and interpretative signage at Gateway locations along the route, e) the implementation of Sustainable Drainage Systems (SuDS) nature-based drainage proposals at the Gateway locations to cater for surface water drainage at car park locations, f) fencing and screening will be erected where required for health and safety and biodiversity reasons which will include 2250 meters of screening and 1925 meters of boundary treatment fencing, g) all other ancillary and associated site work. This Planning Application is accompanied by a Natura Impact Statement (NIS)	Granted	18-Aug-25

Table 2-2: Littleton Planning Search (Applications Adjoining the Site)

Reg Ref	Development Description	Status	Decision Date
Applications adjoining the sites redline boundary (excluding grid connection as this does not form part of the redline boundary)			
24178	Retention of an existing ESB substation and distribution room building and all associated site works	Granted	27-Sept-24



Table 2-3: Littleton Planning Search (Applications within 500m of The Site)

Reg Ref	Development Description	Distance from Site	Status	Decision Date
Applications within 500m of the site (excluding grid connection as this does not form part of the redline boundary)				
201152	a) An extension to existing attached domestic storage shed, b) An existing domestic storage shed/garage, c) elevational amendments to dwelling and attached domestic storage shed, d) a site entrance and all associated site works	c. 280m to the West	Granted	22-Jun-21
21443	construction of 1) a slatted shed and 2) extension of existing silage slab and carry out all associated site works	c. 290m to the West	Granted	27-May-21
2360145	a walled dungstead and all associated site works	c. 250m to the Northwest	Granted	24-Apr-23
2360767	a new two storey dwelling, garage house with garage, shared entrance, septic tank and percolation area with all associated siteworks	c. 350m to the West	Granted	28-Mar-24
2461072	a new two storey dwelling, garage house with garage, shared entrance, septic tank and percolation area with all associated siteworks	c. 360m to the West	Granted	11-Feb-25
2461108	a single storey 3 bedroomed house, splayed and recessed entranceway, secondary treatment system with soil polishing filter and all associated site works on and under land	c. 250m to the South	Granted	18-Feb-25
2586	traditional style two-storey dwelling, domestic garage, septic tank and percolation area together with new site entrance and carry out all associated site works	c. 400m to the West	Granted	10-Jul-25
2560682	construction of loose shed and all associated site works	c. 350m to the West	Granted	09-Sept-25



3. PROPOSED DEVELOPMENT

3.1 Requirement of EIA

This Section reviews the Proposed Development against the Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment as amended by Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 – “The EIA Directive” and its requirements as transposed into Irish law.

Schedule 5, Part 2 (3)(i) of the Planning and Development Regulations 2001 (as amended) “Planning Regulations” refers to:

“Installations for the harnessing of wind power for energy production (wind farms) with more than 5 turbines or having a total output greater than 5 megawatts”.

The Proposed Development includes 11 no. turbines (approximately 68.2MW) and therefore falls within a class of development set out in Schedule 5, Part 1 and 2. It therefore meets the requirements for a mandatory EIA in this regard.

Furthermore, a notice has been served by An Coimisiún Pleanála (ACP Ref. ABP-311587-21, Appendix A of this Report) under section 37(B)(4)(a) confirming the development is SID. As such an EIAR is mandatory - section 37E(1) of the Planning Development Act 2000 (as amended) provides as follows:

“(1) An application for permission for development in respect of which a notice has been served under section 37B(4)(a) shall be made to the Board and shall be accompanied by an environmental impact assessment report in respect of the proposed development.”

3.2 Description of Development

The Proposed Development for which consent is being sought will consist of the following:

- Construction of 11 no. wind turbines with a blade tip height of 200 m, a hub height of 119 m and a rotor diameter of 162 m.
- Construction of permanent turbine foundations and crane pad hard standing and assembly areas including associated drainage infrastructure;
- Construction of 15.45 km of new internal access tracks and associated drainage infrastructure;
- Upgrading of 2.95 km existing tracks and associated drainage infrastructure;
- Creation of 3 no. new site accesses (2 no. on the Local Road L4114 and 1 no. on the Regional Road R639) to serve as construction and operation accesses to the Proposed Wind Farm Site
- Upgrading of 3 no. existing site entrances (1 no. on the L2201 and 2 no. on the Local Road L4153) to serve as construction and operation accesses to the Proposed Wind Farm Site;
- Installation of new pipe culverts within the Proposed Wind Farm Site where proposed infrastructure crosses existing drains;
- All associated drainage and sediment control including interceptor drains, cross drains, sediment ponds and swales;
- Development of 1 no. on-site construction borrow pit and associated ancillary drainage;



- 5 no. temporary construction site compounds and associated ancillary infrastructure including parking,
- 2 no. temporary security cabins;
- Erection of 1 no. permanent meteorological mast to a height of 120 m above ground level, with an approximately 1 m long lightning protection rod protruding above this;
- Construction of 1 no. permanent onsite 110 kV electrical substation to EirGrid specifications, including an associated compound and ancillary infrastructure comprising:
 - Control buildings, equipment storage and welfare facilities
 - Electrical infrastructure
 - 10no. Car Parking spaces (of which 4no. are EV Parking with chargers)
 - 2 no. Wastewater holding tanks
 - 2 no. Rainwater harvesting tanks
 - 2 no. Water supply bored wells
 - Telecommunications tower to a height of 36m (with an approximately 1 m long lightning protection rod protruding above this) and associated fencing, foundation and hard-standing area
 - Lightning masts and lighting poles
 - Security fencing and stock proof fencing
- Installation of medium voltage underground electrical and communication cabling connecting the wind turbines to the proposed on-site substation and associated ancillary works;
- All associated infrastructure, services and site works including excavation, earthworks, peat and spoil management;
- Creation of 6 no. dedicated peat and spoil deposition areas and berms for the management of peat and spoil within the Site;
- Vegetation clearance to facilitate construction and operation of the proposed development;
- Provision of onsite recreation and amenity facilities to include a 4km walking/cycling trail and associated car park;
- Biodiversity enhancements measures to include tree planting, drain blocking, wetland retention, ponds, eucalyptus removal, nest boxes, log piles, refugia / hibernacula, calcareous grassland and Marsh Fritillary habitat within the Wind Farm Site.

Permission is being sought for a period of 10 years for the Wind Farm and an operational life of 35 years from the date of full commissioning. Permission is sought in perpetuity for the operation of the Substation as this will become an asset of the national grid under the management of EirGrid and ESB Networks and will remain in place upon decommissioning of the Proposed Wind Farm.

Whilst consent is not being sought as part of this application for the proposed Grid Connection (GC) route to facilitate a connection to the national transmission grid network at the Ballyragget 110kV substation in the townland of Moatpark, Co. Kilkenny, it is assessed as part of this EIAR. Consent for the Proposed Grid Connection will be sought through a separate planning application.



Certain temporary accommodation works associated with the Turbine Delivery Route (TDR) are subject to the Environmental Impact Assessment (EIA) but do not require planning consent. Details on the temporary works to facilitate the delivery of turbine components to the Site are contained in Appendix 4.2 of Volume 3 of the EIAR and include hedge or tree cutting, relocation of powerlines/poles, lamp posts, signage and temporary local road widening. For these locations, works have been identified and assessed in the EIAR, however, permission for these works will be sought separately with the local Planning Authority through road opening licenses as necessary.

3.3 Details of Proposed Development

The Proposed Development consists of an 11 no. turbine wind farm and associated infrastructure including internal access tracks, hard standings, additional amenity trails, an onsite borrow pit, peat deposition areas, a permanent meteorological mast, an onsite 110kV substation and associated grid connection infrastructure, internal electrical and communications cabling, temporary construction compounds, drainage infrastructure, biodiversity management and enhancement measures, temporary accommodation works along the Proposed Turbine Delivery Route and all associated works related to the construction of the Proposed Development.

The TDR travels from the port of entry of Foynes in the following route:

- Loads will exit Foynes Port and join the N69 heading east;
- At Limerick, they will join the N18 heading northeast and merge onto the M7;
- Loads will exit at Junction 17 Portlaoise Interchange and perform a U-turn to re-join the M7 heading southwest;
- They will merge onto the M8 and continue southwest;
- At the M8 Junction 4 East Roundabout loads will turn left to join the R693;
- At the following roundabout loads will turn right onto the R639 then drive through Urlingford;
- To the southwest of Urlingford loads will turn left at the proposed site entrance.



The TDR traverses through the following townlands: Friarsland, Bushfield or Maghernaskeagh, Gortnagroagh, Doon, Rathbane South, Deegerty, Rosdrehid, Curragh, Derrinsallagh, Derrycarney, Kilgorteen, Newtown, Cragmore, Ballyvogue, Coolrahee, Tomdeely North, Cloonreask, Clashnevin, Ballysimon, Gardenhill, Ballysimon (Staunton), Lisnagry, Togher, Lissatunny, Tyone, Garraunykee, Clonard Or Cappaloughlin, Garraun, Elmpark Demesne, Cragbeg, Corcamore, Doon, Annaholty, Gooig, Killeany, Tomdeely South, Knockalton Lower, Glenbane East, Carrigatogher (Harding), Oorla, Gortnalagh, Killalane, Boola, Tullahedy, Castlecranna, Cooleen, Knockmay, Cloghleigh, Ballycrine, Lackenavea (Dunalley), Garraun, Ballyhisky, Brackloon, Longfordpass South, Kilnacranra, Ballyengland Upper, Ballynahinch, Sroolane North, Graiguepadeen, Derryvorrigan, Loughan, Carrigatogher (Ryan), Curraheen, Trumra, Springfield Or Knockkyle, Moig South, Killonan, Glennamade, Ballyrune, Ballyvareen, Knockroe, Ballyhinode, Castleroan, Ballinteenoe, Crokerspark, Boherard, Thesheehys, Greenhills, Busherstown, Clondouglas Or Clonkeen, Clonkeen, Clynoe, Longfordpass East, Longfordpass North, Clonboyne, Cowpark, Derrymore, Tinderry, Timoney, Parknahown, Clonagooden, Ballykelly, Curraghmore, Kilcotton, Coolderry, Fawnlough, Derreen, Coolbeg, Currahchase North, Derrybane, Rathnaveoge Lower, Knockalton Upper, Lahesseragh, Cloncough, Leap, Fatharnagh, Ballinacurra (Weston), Erris or Skirk Glebe, Grangefertagh, Crossagalla, Woodpark, Ballynacourty, Sallymount, Rathmale, Court, Cloghatacka, Rossbrien, Parkwood, Rathurd, Cloon And Commons, Inchmore, Askeaton, Glascurram, Dooradoyle, Bunlicky, Falleen, Corraun, Garrynafana, Knockane, Gortmore, Gortnaskehy, Camlin, Carrigatogher (Abbott), Richhill, Robertstown, Morgans South, Corrig, Ardaneer, Blossomhill, Ballybrown, Aghmacart, Cannonswood, Islands, Warrenstown, Foulkscourt, Ballyclogh, Woodstown, Huntingstown, Moneygall, Kilnaseer, Ballycuddahy, Drumbaun, Oldtown, Maynebog, Coolnacrutta, Oldglass, Cross, Bohereen, Ballycuddy More, Loughanleagh, Bolane, Banemore, Ballyduane, Garravally, Dromlohan, Boherboy, Gortnadrumman, Ballycahill, Benedin, Ballintotty, Ballygorteen, Ballyhomin, Castlemungret, Rathnaveoge Upper, Ballyslea, Touknockane, Ballyard, Part Of Mountshannon, Rossfinch, Part of Carrigatogher (Abbott), Part of Carrigatogher (Harding), Part Of Carrigatogher (Ryan), Ballykeeffe, Skehacreggaun, Peafield, Craggs, Sroolane, Clash, Park, Durnish, Carrowkeel, Killeisk, Rathlogan, Glashare, Tintore, Ballyengland Lower, Palmershill, Clonrud, Rockforest, Ballinacurra (Hart), Cullenwaine, Fennor, Drumroe, Coolfin, Moatquarter, Killeen, Rincullia, Baunrickeen, Glenbeha, Gortnaclea, Clonadacasey, Urlingford, Ballywilliam, Addergoole, Barnasallagh, Cuffsborough, Lissanisky, Lismore, Cappadine, Mountfinn, and Delligabaun.

The proposed GC route will exit north of the Proposed Wind Farm Site along the Local Road L4114 to the Ballyragget 110kV Substation located in the Townland of Moatpark. The proposed Grid Connection route will include underground 110kV cabling which will traverse the Public Roads L-4114, L-1857, R693, R694 and N77 in the following townlands within County Tipperary: Longfordpass East, Graiguepadeen, Longfordpass North, Fennor and Longfordpass South and the following townlands in County Kilkenny: Freshford Lots, Borrisnoe, Killawardy, Clomantagh Upper, Acragar, Moneenaun, Urlingford, Kilrush, Glenreagh, Kilduff, Borrisnafarney, Barnane, Sweethill, Ridge, Balief Lower, Bohernarude, Kilmacuddy, Killoskehan, Cloncannon, Grange, Moatpark, Barna, Ballybeg, Parksgrove, Baunaniska, Ballyconra, Stook, Graigueswood, Clone, Borrisbeg, Borrismore, Gortagarry, Clomantagh (Mt. Garret), Mountfinn, Barnagrotty, Balief Upper, Clomantagh Lower, Tobernameastia, Darbyshill, Monabrika, Aghnameadle and Blakefield.

the following townlands within County Tipperary: Longfordpass East, Graiguepadeen, Longfordpass North, Fennor and Longfordpass South. The cable then enters County Kilkenny, and traverses the following townland within the public road, terminating at the Ballyragget 110kV Substation: Freshford Lots, Borrisnoe, Killawardy, Clomantagh Upper, Acragar, Moneenaun, Urlingford, Kilrush, Glenreagh, Kilduff, Borrisnafarney, Barnane, Sweethill, Ridge, Balief Lower, Bohernarude, Kilmacuddy, Killoskehan, Cloncannon, Grange, Moatpark, Barna, Ballybeg, Parksgrove, Baunaniska, Ballyconra, Stook, Graigueswood, Clone, Borrisbeg, Borrismore, Gortagarry, Clomantagh (Mt. Garret), Mountfinn, Barnagrotty, Balief Upper, Clomantagh Lower, Tobernameastia, Darbyshill, Monabrika, Aghnameadle and Blakefield.



A recreational amenity in the form of walking and cycling trails is proposed utilising a combination of the internal access tracks proposed within the Wind Farm Site and approximately 4.0 km of new floating dedicated amenity tracks, with all new amenity trails designed to a width of 3 m to accommodate both pedestrians and cyclists. To support public access, an additional car parking area is proposed adjacent to the proposed site entrance to the R639 road in proximity to the amenity trail. The proposed locations and layouts of the recreational trails and associated infrastructure are illustrated in the planning application drawings, Series No. 0100.

The BEMP lands are located wholly inside the site boundary, in Littleton Bog, and shown on Figure 6.15 of Volume 3 of this EIAR. The BEMP includes the following:

- Details of all measures to be taken to protect and enhance habitats of local biodiversity value occurring at the site and the species which utilise the same within the vicinity;
- A description of target habitats and range of species appropriate to the site;
- Appropriate strategies for maintaining existing and targeted habitats and species;
- Timelines for new planting and habitat creation;
- Details of ecological oversight and monitoring;
- A map identifying the areas to be managed.

A 10-year planning permission and 35-year operational life from the date of commissioning of the Proposed Wind Farm (including the meteorological mast) is being sought, after which it would be decommissioned and the turbines dismantled and removed, unless further consent is secured to operate for an additional time period.

A permanent planning permission is being sought for the substation as this will become an asset of the national grid under the management of EirGrid and ESB Networks and will remain in place upon decommissioning of the Proposed Wind Farm.

Consent is not being sought for the proposed GC route to facilitate a connection to the national transmission grid network at the Ballyragget 110kV substation, Co. Kilkenny. A separate planning application will be made for this in due course. However, the GC route is assessed as part of the EIAR.

3.4 Site Selection Overview

Please refer to Chapter 3 - Consideration of Reasonable Alternatives, Volume 2 of the EIAR, for the full extent of the site selection process and consideration of alternatives. A short synopsis is included below for context.

Prior to the selection of the site for this Proposed Development, the Applicant undertook a detailed screening exercise using selection criteria and several stages to assess the potential of accommodating a Wind Farm development. The site selection criteria included:

- Compliance with County Development Plan Policies and Designations
- Scale of available land to accommodate a Wind Farm, taking into account turbine spacing requirements
- Natura 2000 sites
- Avoidance of Environmental Designations
- Lands utilized for other wind farm developments



- Separation distance from dwellings
- Level of visual impact
- Amenity, Tourist or Scenic Areas
- Proximity to National Electricity Grid
- Proximity to protected airspace
- Wind Resource
- Potential project scale
- Site accessibility

3.4.1 Strategic Site Selection

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

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

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

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

“Harnessing the potential of the region in renewable energy terms in accordance with the capacity allocation targets set out ..., across the technological spectrum from wind and solar, in addition to biomass and wave energy”

This key priority is restated in the first revision of the NPF published in April 2025.

3.4.1.1 *Site Assessment Process*

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

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



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

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

Key criteria were selected for the site-specific assessment, which not only covered the broad range of issues which can arise from wind farm development but also allowed for direct comparison between candidate sites to determine their relative suitability. To facilitate the selection process, greater emphasis was placed on certain criteria viewed as critical to site suitability, including environmental sensitivity, grid access/capacity, CDP and zoning, and proximity to houses.

3.5 Evaluation of Layout and Design

The design has been carried out in accordance with industry guidelines and best practice, namely the Department of Environment, Heritage and Local Government's (DoEHLG) Wind Energy Development Guidelines (2006), The Department of Housing, Planning and Local Government's (DoHPLG) Draft Revised Wind Energy Development Guidelines, and the Irish Wind Energy Association Best Practice Guidelines (2012). The design process of the Proposed Development has had regard to the Draft Revised Wind Energy Development Guidelines (2019) in terms of mitigation by design including increased setback from nearby dwellings and the policy regarding zero shadow flicker.

The design of the Proposed Development was an iterative process which considered a range of alternative designs throughout the evolution of the project, including;

- Set back from houses;
- Set back from village and town cores, designated sites;
- Set back from other constraints such as watercourses and power lines;
- Suitable wind speeds;
- Landscape and visual sensitivity;
- Ecology, including wetland areas and other key habitats that have developed since the implementation of the Phase 1 rehabilitation measures;
- Ornithology;
- Soils and Geology;
- Hydrology;
- Noise; and
- Cultural Heritage.



Constraints and environmental sensitivities were first identified, and buffers applied in order to determine appropriate areas within the site to accommodate development. This constraints exercise resulted in a developable area being defined. Once the viable area was established, the siting requirements of the wind turbines in terms of separation distances etc. were considered and a preliminary layout was developed for the site. All proposed wind turbines and infrastructure associated with the Proposed Development were sited as far as is possible to avoid the wetland areas and other key habitats which have developed following the implementation of the Phase 1 Rehabilitation Measures on site.

Following the constraint analysis of the site to determine available development area and following discussions with Turbine suppliers on the potential available turbines and the suitability of turbines for the site it was determined that a hub height of 119m and a rotor diameter of 162m with a tip height of 200m was the most suitable and economical for the site, and would seek to maximise the contribution to 2030 targets. It was through this refinement process, the results of the Landscape Visual Impact Assessment and public consultation, that the Proposed Development came to its final iteration of 11 no. turbines.

3.6 Pre-Application Consultation

A thorough pre-application consultation process was undertaken by the Applicant and their Design Team. This occurred through the formal SID Pre-Application process with An Coimisiún Pleanála, early engagement with Tipperary County Council as part of the Local Authority Pre-Application process. Two pre-application meetings were held with Tipperary County Council, the first meeting was held on 8th December 2021, and the second meeting was held on 10th September 2025. A detailed EIA Scoping Consultation was undertaken with statutory bodies as well as meetings with statutory consultees such as NPWS. Comprehensive community consultation was also undertaken. This pre-application consultation is detailed in Volume 2, Chapter 2 - Background to the Proposed Development of the EIAR which accompanies this planning application.

Although not included within the application for the Proposed Littleton Wind Farm, for the sake of completeness, pre-planning consultation correspondence has been conducted with Kilkenny County Council in relation to the GC route.

As the underground grid connection route for the wind farm's connection to the national electricity grid predominantly is in County Kilkenny, pre-planning consultation correspondence was issued to Kilkenny County Council on the following occasions:

- 17 September 2021 – the EIA Scoping Report was issued to Kilkenny County Council. No response was received.
- 8 March 2023 – an updated copy of the EIA Scoping was issued to Kilkenny County Council. No response was received.
- 6 June 2025 - A request for a pre-planning consultation was issued to Kilkenny County Council. No response was received.

Two pre-application meetings were held with An Coimisiún Pleanála under Section 37B of the Planning and Development Act, with the final meeting held on 1st December 2025. The close-out was received from An Coimisiún Pleanála dated 24th March 2026.

This planning application has sought to respond to all feedback (both from statutory consultees and general public) received during the pre-application consultation process.



3.7 Community benefit fund

In addition to employment during the construction and operational phases of the Proposed Development and annual rates that will be paid to the local authority by the developer, a Community Benefit Fund will be developed during the first year of operation of the wind farm.

A key criterion of the Department's Community Benefit Rulebook, as updated in 2025, is that the projects and initiatives will benefit the communities surrounding the wind farm. As part of this, a Fund Committee will be established and will consist of a number of volunteer community representatives, the project Developer and administrator (if applicable). The Fund Committee should aim to represent the widest cross-section of the community possible. The Fund Committee will then develop a strategy for the Community Fund. Both BnM and SSE have a long history of delivering local community funds, and have supported a number of strategic initiatives, including scholarships and major projects.

For example, SSE operates a Scholarship Fund for students living near Galway Wind Park, and BnM offers Scholarships across its Cloncreen, Derrinlough and Oweninny Phase 2 Wind Farms. These funds can provide a monetary grant to a number of successful applicants, for each year of study, up to a maximum of 4 years, for a number of students (including apprenticeships) living in the vicinity the Proposed Development. The Scholarship may be used towards course fees, accommodation, tools, transport costs, etc.

The Fund will also include a Near Neighbour Scheme which will offer principal primary residents 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. In addition to these payments, this Scheme may also offer participants a contribution towards the completion of energy measures on the property and/or education support.

The value of the Community Benefit Fund will be linked to the productivity of the wind farm and is calculated based on €2/MWh and the overall total generated by the wind farm. It is estimated that the proposed Fund could be in the region of circa €5.5 million over the first 15 years of the Fund, on the basis that the proposed project will generate 185,204 MWh of electricity produced per year.



4. PLANNING POLICY AND LEGISLATIVE CONTEXT

This section of the report provides a high-level contextual overview of the relevant planning policies and objectives associated with this Wind Farm proposal. For a detailed planning policy assessment of international, national, regional, and local policies associated with the Littleton Wind Farm please refer to Chapter 2 - Background to the Proposed Development, Volume 2 of the EIAR.

Within this Renewable Planning Statement, we review the need for the Proposed Development based on a review of the national need to implement legally binding climate change targets by encouraging appropriate renewable energy development throughout Ireland and we present a clear justification of the policy context for the Proposed Development.

4.1 Compliance with European and National Energy and Climate Policy

4.1.1 Relevant EU Policy

There have been two critical pieces of European legislation which has a significant impact on how the Competent Authority should have regard to National Climate and Energy Policy in the context of assessing this project pursuant to Section 37E of the Planning & Development Act 2000 (as amended).

Council Regulation 2022/2577¹ represents an obligation on EU Member States to accelerate renewable energy projects such as this one as a matter of urgency, the deployment of which is viewed as vitally important to the achievement of the EU's strategic objectives. As per Article 10 of the Regulations the Regulation is "*binding in its entirety and directly applicable in all Member States*".

Significantly, the Regulation incorporates and makes clear that renewable energy projects enjoy a rebuttable presumption that they are of overriding public interest and serving public health and safety, in particular, for the purposes of the relevant Union environmental legislation, except where there is clear evidence that these projects have major adverse effects on the environment which cannot be mitigated or compensated for.

The Fit for 55 package² included an EU Commission proposal to revise the Renewable Energy Directive (EU) 2018/2001. This proposal was further updated in May 2022 as Part of the REPower EU Plan and subsequently endorsed by EU ambassadors (COREPER) on the 27th September 2023³, and came into force in November 2023.

RED II⁴ set a binding overall Union target to reach a share of at least 32% of energy from renewable sources in the Union's gross final consumption of energy by 2030. The text that has been adopted by the European Parliament and endorsed by COREPER increases this target to 42.5%. This target is now captured in RED III Directive.

Additionally, the Directive obliges EU Member States to "*collectively endeavour to increase the share of energy from renewable sources in the Union's gross final consumption of energy in 2030 to 45 %*".⁵

¹ <https://eur-lex.europa.eu/eli/reg/2022/2577/oj>

² <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52021PC0557>

³ https://www.europarl.europa.eu/doceo/document/TA-9-2023-0303_EN.html

⁴ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018L2001>

⁵ Article 3, paragraph 1.



The associated recital (Recital 5) included in the final agreed text provides useful context:

*“The REPowerEU Plan set out in the Commission communication of 18 May 2022 (the ‘REPowerEU Plan’) aims to make the Union independent from Russian fossil fuels well before 2030. That communication provides for the front-loading of wind and solar energy, increasing the average deployment rate of such energy as well as for additional renewable energy capacity by 2030 to accommodate the higher production of renewable fuels of non-biological origin... In that context, it is appropriate to increase the overall Union renewable energy target to 42,5% in order to significantly accelerate the current pace of deployment of renewable energy, thereby accelerating the phase-out of the Union’s dependence on Russian fossil fuels by increasing the availability of affordable, secure and sustainable energy in the Union. **Beyond that mandatory level, Member States should endeavour to collectively achieve an overall Union renewable energy target of 45% in line with the REPowerEU Plan.**”*

This indicates a significant increase in the mandatory targets for renewable energy in the EU, aiming for a more sustainable and independent energy system, with signals of further increasing ambition through the 45% stretch target. This increased ambition for renewable energy at an EU level must be accommodated and addressed in member states Climate Action Plans.

The Directive also includes specific observations and measures related to the accelerated deployment of renewable energy, storage and grid infrastructure projects across EU member states.

The Directive came into force in November 2023 and was transposed by the Renewable Energy Regulations. The Directive provides further clear policy support at European level. The Directive is highly relevant for three reasons.

- Firstly, it envisages and requires a step-change in terms of the immediacy and ambition for renewable energy development across the Member States, without which the Union's climate neutrality objective simply cannot be achieved.
- Secondly, it identifies the social and environmental benefits of renewable energy development as noted in Recital 2 *“By reducing those greenhouse gas emissions, renewable energy can also contribute to tackling challenges related to the environment, such as the loss of biodiversity, and to reducing pollution” and which will help to achieve the aim to “protect, restore and improve the state of the environment by, inter alia, halting and reversing biodiversity loss” while bringing “broad socioeconomic benefits, creating new jobs and fostering local industries”*

The Proposed Development is a ‘renewable energy project’ and comprises ‘renewable energy plant’ for the purposes of the revised Renewable Energy Directive (Directive 2023/2413 amending Directive 2018/2001 – “RED III”). As this application is made after 6 August 2025, S.I. No. 274/2025 - European Union (Planning and Development) (Renewable Energy) Regulations 2025, which was subsequently followed by an amending regulation S.I. No. 426 of 2025 issued to correct typos – also applies to it. The application is for a ‘renewable energy development’ and is subject to Sections 37JA and 37JB of the Planning and Development Act, 2000, as amended by S.I. No. 274/2025 as amended by S.I. 426 of 2025 (“2000 Act”). Whereas S.I. 274/2025 partially transposes RED III with respect to the Appropriate Assessment process under Section 177AA of the 2000 Act, those regulations are of limited effect.

Article 16b of RED III was required to be transposed no later than 1 July 2024. In the absence of formal transposition, aspects of Article 16b when read together with Recital (37) of RED III are sufficiently precise, clear and unconditional to be directly effective as regards permitting decisions to be made by An Coimisiún Pleanála, planning authorities, and the National Parks and Wildlife Service.



In particular, Article 16b of RED III makes it clear that the occasional or incidental killing or significant disturbance of birds by the construction and operation of renewable energy plant shall not be considered to be 'deliberate' and therefore prohibited by Article 5 of the Birds Directive. Article 16b has the same effect as regards species protected by Article 12 of the Habitats Directive. This is on condition that the renewable energy project has adopted appropriate and necessary mitigation measures as noted in Chapter 7 - Ornithology in Volume 2 of the EIAR.

4.2 Relevant National Energy Policy and Legislation

Ireland declared a climate emergency on May 9, 2019. This declaration was made through an amendment to a parliamentary motion related to a report on climate action. The amendment, which declared a "*climate and biodiversity emergency*," was accepted by both the government and opposition parties, making Ireland the second country in the world, after the United Kingdom, to declare a climate emergency formally.

The Emergency was declared against a backdrop of GHG emissions that were described by the Governments' Climate Change Advisory Council as "*disturbing*" and that Ireland was "*completely off course in terms of its commitments to addressing the challenge of climate change*".⁶

It was in this context that the Climate Action and Low Carbon Development (Amendment) Act 2021 was adopted. The Climate Action and Low Carbon Development Act 2015 and its subsequent amendments in 2021 serve as the primary legislative framework guiding Ireland's approach to addressing climate change and promoting a sustainable, low-carbon economy.

The 2021 amendment to the 2015 Act significantly enhanced the original 2015 Act in response to increasing global momentum on climate action and a heightened awareness of the urgency to address the climate crisis. In particular the Act includes:

- **Carbon Budgets:** The amendment introduced a system of rolling carbon budgets, which are five-year ceilings on total greenhouse gas emissions in Ireland. These budgets are set for successive periods, and the government must develop a plan to adhere to them.
- **Formal 2030 Target and strengthened 2050 Target on Emissions:** The amendment committed Ireland to halving emissions by 2030 and achieving climate neutrality (net-zero emissions) by 2050.
- **Enhanced Role of the Climate Change Advisory Council:** The Council was given a stronger role in recommending carbon budgets and assessing the government's progress.
- **Strengthened Reporting and Accountability:** The amendment introduced stricter requirements for the government to report on its progress and to align its policies with the carbon budgeting framework.
- **Sectoral Emissions Ceilings:** To support the carbon budgets, the amendment required the government to set binding sectoral emissions ceilings, ensuring that different sectors (e.g., transport, agriculture, energy) contribute to meeting the national targets.

Also, critically and importantly for the purposes of the **Commission's (ACP) consideration of this application, it provides that a relevant body, such as the Commission, shall, insofar as practicable, perform its functions in a manner consistent with the mostly recently approved Climate Action Plan and other matters set out in section 15 of the 2015 Act.**

⁶ Climate Change Advisory Council Annual Report 2018 at pp.ii-iv.



Climate Action Plan

It is within the context of the European Policy and National Policy and legislation that the Climate Action Plan is set. The Climate Action Plan 2023 (CAP23) was the first Plan to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021, and follows the introduction, of the carbon budgets and legally binding sectoral emissions ceilings. Since 2023, 2no. revisions of the Plan has been prepared, CAP24 and CAP25.

CAP25 underlines the important role the planning regime will play in developing Ireland's renewable energy capacity. The latest Climate Action Plan 2025 (hereafter CAP25) was approved by Government on 15 April 2025. It is the third statutory Climate Action Plan since the Climate Action and Low Carbon Development (Amendment) Act 2021 was passed and the fifth overall. It is the last Climate Action Plan of Ireland's first five-year carbon budget, representing an important half-way mark to 2030. If Ireland is to close the Greenhouse Gas (GHG) emissions gap and make headway towards our 2030 and 2050 emissions reduction targets, we must accelerate progress already made and deliver on the actions in CAP25 as well as rapidly and fully implementing those legacy/delayed actions and policies from CAP23 and CAP24.

CAP25 is to be read in conjunction with CAP24 as an updated and amended plan. All the measures and actions to support the delivery of binding climate targets are set out within the plan. CAP25 has an Annex of Actions which sets out new, high impact actions for 2025 and includes delayed actions from both CAP24 and CAP23 which will be tracked until completion.

A key element of CAP25 is the decarbonization of Ireland's electricity system, primarily through a significant increase in renewable energy generation. The plan reiterates ambitious targets for renewable electricity, aiming for 50% by 2025 and 80% renewable energy by 2030. These goals will be met by accelerating the deployment of:

- Onshore wind: 2 GW by 2025; 9 GW by 2030
- Offshore wind: 5 GW by 2030
- Solar energy: Up to 5 GW by 2025; 8 GW by 2030

Delivery of Climate Change Targets

The targets set out in CAP 24/25 are legally binding by virtue of the Climate Action and Low Carbon Development Act 2015 (as amended), however despite this, multiple assessments, including the Climate Change Advisory Council (CCAC) Annual Review⁷ and the Environmental Protection Agency (EPA) emissions projections⁸, confirm that Ireland is not on track to meet these targets. Significant gaps remain in renewable energy deployment, particularly in grid capacity expansion and wind farm development, while continued reliance on fossil fuels threatens national and EU climate commitments.

As identified in the National Planning Framework First Revision⁹, the Southern Region target requires facilitating a further 978MW of renewable power up to 2040. Securing planning permissions for appropriately located and well-designed renewable energy projects, such as the Proposed Development, is essential in order to meet this target.

⁷<https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR2025-Electricity-FINAL.pdf>

⁸<https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/07875-EPA-GHG-Projections-Report-FINAL.pdf>

⁹ <https://cdn.npf.ie/wp-content/uploads/National-Planning-Framework-First-Revision-April-2025-1.pdf>



Littleton Wind Farm would make a meaningful contribution to the renewable energy targets for the Southern Region as set out in the National Planning Framework First Revision while also supporting the broader national goals set out in CAP25 and required under Climate legislation. Its approval would make a noteworthy contribution (up to 68.2MW) towards renewable energy ambitions, and help bridge the widening gap between policy commitments and actual energy infrastructure development.

Implications of approvals with respect to Ireland's climate action targets

The approval of well-planned, appropriately located renewable energy projects, such as the Proposed Development, would support not only Ireland's ability to meet CAP25 targets but also its legal commitments under national and EU law. CAP25, the CCAC Annual Reviews for 2023 and 2024, and Ireland's Updated National Energy and Climate Plan (published in July 2024)¹⁰ all highlight the central role of renewable energy targets in addressing climate change.

4.2.1 Assessment

This section of the report clearly sets out Ireland's obligations in addressing Climate Change. Ireland has been mandated by the European Union to set legally binding targets for the reduction in greenhouse gas emissions by over half by 2030 and these provisions are set out in the Climate Act 2021. Sectoral specific targets are set out in the Climate Action Plan 2025 which requires the installation of 9 GW of Onshore Wind Energy by 2030 and 6GW by 2025. Currently there is an installed capacity of c. 4.9MW which demonstrates that there is a significant requirement by all bodies to work together to achieve this target. The enormity of the challenge is recognised in the Climate Action Plan 2024/25 where it is stated *"To achieve the necessary emissions abatement, an approximately eight-times increase of renewable energy deployment to 2.3 GW annually would be needed between 2024 and 2030"*.

The importance of meeting these legally binding targets is recognised by government by setting out clear parameters on how 'relevant Bodies' in this instance The Commission should perform their function. Section 17 of the Act 2021 requires the Board to *"perform its functions in a manner consistent with"* the most recent approved climate action plan, national long term climate action strategy, national adaptation framework and sectoral adaption plans.

It is respectfully submitted that the Commission in weighing up competing policy objectives as part of their determination, shall consider this overarching, legally binding, emissions reduction objective, and perform their functions in a manner that is consistent with the delivery of the legally binding sectoral emissions ceilings, and associated Climate Action Plan targets.

¹⁰ <https://assets.gov.ie/static/documents/irelands-integrated-national-energy-and-climate-plan-2021-2030.pdf>



4.3 Regional Planning Policy

4.3.1 Southern Regional Spatial & Economic Strategy 2020-2032

The Southern Regional Spatial & Economic Strategy (RSES) came into effect on 31st January 2020. The RSES sets out a strategy to implement the NPF at a regional level and covers the period from 2020-2032 and contains a strategic vision which includes actions to mitigate against climate change. The RSES recognises the urgency to transition to a low carbon future, accelerate the transition towards a low carbon economy and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture in order to safeguard and enhance the region’s environment through sustainable development, prioritising action on climate change across the region, driving the transition to a low carbon and climate resilient society.

In relation to wind energy, the RSES states the following:

“Wind energy is currently the largest contributor of renewable energy, and it has the potential to achieve between 11-16GW of onshore wind and 30GW of offshore wind by 2050 (SEAI, 2016). The sector can make a significant contribution to meeting national energy demands while attaining our energy and emissions targets for 2020 and beyond.”

The RSES includes a range of policy objectives which support the development of renewable energy projects such as the Proposed Development. As outlined in Table 4-1, below, Regional Policy Objectives (RPO’s) include the following:

Table 4-1: Regional Spatial and Economic Strategy (RSES) - Regional Policy Objectives (RPO’s)

Regional Policy Objective	Description
RPO 50	It is an objective to further develop a diverse base of smart economic specialisms across the rural Region, including innovation and diversification in (among other things) renewable energy as a dynamic driver for the rural economy.
RPO 56	The RSES recognises the urgency to transition to a low carbon future and it is therefore an objective to accelerate the transition towards low carbon economy and circular economy through mechanisms such as the Climate Action Competitive Fund
RPO 95	It is an objective to support implementation of the National Renewable Energy Action Plan (NREAP), and the Offshore Renewable Energy Plan and the implementation of mitigation measures outlined in their respective SEA and AA and leverage the Region as a leader and innovator in sustainable renewable energy generation.
RPO 99	It is an objective to support the sustainable development of renewable wind energy (on shore and offshore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.
RPO 100	Facilitate the delivery of the renewable energy targets of the Climate Action Plan and the National Energy and Climate Plan by supporting the development of electricity generation from renewable sources.”



Regional Policy Objective	Description
RPO 101	Support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned renewable energy developments and interconnection.”

As described within the relevant RSES objectives as shown in Table 4-1 above, it is recognised that the region has a rich natural energy resource, with the RSES demonstrating that the region is open to renewables energy developments and recognises the required transition from fossil fuels to the use of renewables. The strategy further notes that this can contribute to new employment, community sustainability and attract additional people to the region.

4.3.1.1 Project Response

The Proposed Development aligns with the goals and objectives of the RSES, which priorities the transition to a low-carbon economy through increased deployment of renewable energy at suitable locations. The Proposed Development at the Littleton Bog is located within an area zoned as being “Open to Consideration” for on-shore wind energy development, as per the current Tipperary County Development Plan 2022 – 2028. Therefore, the RSES outlines the necessity of scaling up renewable energy to meet national and EU climate commitments while ensuring environmental protection. Assessments conducted and contained within this EIAR show the location at Littleton demonstrates the location of the Proposed Development is appropriate and is based on considerations and assessments related to optimal wind resource availability, technical feasibility for grid connection, land use compatibility, and minimal environmental constraints. The EIAR confirms that the Proposed Development avoids areas of high ecological sensitivity, archaeological and cultural heritage, and is sited to eliminate significant visual impact, while mitigation measures ensure compliance with environmental protection requirements which directly aligns with the RSES within the Southern Region.

4.4 Local Planning Policy

Under Section 28 of the Planning & Development Act 2000 (as amended), in making Development Plans a Planning Authorities must have regard to national policy on renewable energy. A County Development Plan (CDP) is required to indicate how the implementation of the Development Plan will contribute to realising overall national targets on renewable energy and climate change mitigation. This applies in particular to wind energy production and the potential wind energy resource.

The planning application boundary of the Proposed Development sits wholly within Tipperary County Council jurisdiction, with the proposed grid route connection also stretching into Kilkenny County Council.

This section of the statement provides a high-level overview of the relevant local policies and objectives, as set out within the Tipperary County Council Development Plan 2022-2028. The full assessment of the Littleton Wind Farm site against the key local policies and objectives is set out within Chapter 2 - Background to the Proposed Development, Volume 2 of the EIAR.



4.4.1 Tipperary County Development Plan 2022-2028

The Tipperary County Development Plan 2022-2028 (TCDP), which took effect on 22nd August 2022, covers the plan period up to 2028, and recognises that it is essential for a pro-active approach in which the challenges posed by climate change are integrated into the development of policies, plans and programmes. The TCDP recognises the importance of investing in the green economy including employment creation in emerging sectors such as renewable energy. The TCDP states that a sustainable approach to economic development complements the core strength of the economy in the use of natural resources. Key drivers of the growth of the Green Economy globally include emissions reduction targets, increasing fossil fuel prices, diminishing natural resources, the impact of climate change, environmental legislation and consumer preferences.

The Proposed Development will actively support the green economy by helping to reduce emissions, reduce dependency on fossil fuels, produce energy from a renewable source and help fight against climate change, and is in line with environmental legislation.

The renewable energy policies for County Tipperary are set out in Volume 1 Chapter 10 ‘Renewable Energy and Bioeconomy’ of the TCDP, where its stated aims are;

"to supports investment and development in renewable energy and the bioeconomy, as part of a national transition to a low-carbon, climate resilient and circular economy"

The TCDP policy context is grounded in national and regional strategies which are in line with the provision of renewable energy, where the TCDP sets out policies which are considered supportive of solar energy development within county Tipperary. Therefore, and in accordance with national policy as outlined above, the TCDP sets out the long-term vision for the development of County Tipperary, while protecting and enhancing its environment through employing the principles of sustainable development in the policies and objectives such as outlined in TCDP Chapter 10 ‘Renewable Energy and Bioeconomy’.

Chapter 10 ‘Renewable Energy and Bioeconomy’ highlights that renewable energy is very much at the forefront of planning in Tipperary County Council, and that it is recognised that renewable energy-generating sources will have an increasingly important role in the county’s infrastructure provision over the lifetime of the plan and beyond, with the renewable energy sector, and wind energy, looking set to play a more significant role in the economic and infrastructural future of County Tipperary through the following policies and objectives:

Table 4-2: The Policies and Objectives of the Tipperary County Development Plan 2022 – 2028 applicable to the Proposed Development

Planning Policy	Description
Chapter 3 - Low-Carbon Society & Climate Action	
Policy 3-1	Promote and facilitate renewable energy development, in accordance with the policies and objectives of the Tipperary Renewable Energy Strategy 2016 (and any review thereof), and the Tipperary Climate Adaptation Strategy 2019.
Policy 3-6	Support new construction and development forms that use a low embodied carbon approach, and where the full life-cycle carbon, and other environmental impacts are calculated to support the lowest possible energy and CO2 emissions.



Planning Policy	Description
Policy Objective 3-A	Support and facilitate the implementation of European and National objectives for climate adaptation and mitigation, and to prepare a Climate Action Plan for Tipperary in compliance with the Climate Action and Low Carbon Development (Amendment) Bill (DECC, 2020) and any review thereof.
Policy Objective 3-C	Support and participate in the preparation of a Regional Decarbonisation Plan for the Southern Region as part of a framework for action on decarbonisation across all sectors.
Policy Objective 3-E	Support, in collaboration with stakeholders, research and innovation in smart renewable energy technologies and initiatives to accelerate diversification away from fossil fuels
Policy Objective 3-I	Support projects which assist the transition of industrial cut-over peatlands to sustainable after uses.
<p>Project Response: This Application brings forward an ambitious proposal to build a Wind Farm on a site which has historically been the subject of peat extraction, Littleton Bog which is historically associated with industrial scale peat extraction activity until it ceased in c. 2017. As outlined above, the Proposed Development will actively contribute towards achieving European and National objectives and targets related to climate change and renewable energy. As such, it can be considered to be in line with many of the above policies, in particular Policy 3-1 and Policy Objective 3-A.</p> <p>In addition to the proposed Wind Farm, the scheme seeks to deliver additional elements which will conserve biodiversity value and benefit the community including, Biodiversity Enhancement Measures and recreational trails and amenities are also proposed as part of this Application. This emphasises the Applications compliance with Policy Objective 3-I which seeks to support projects which facilitate in this transition away from industrial cut-over peatlands to sustainable after uses.</p> <p>In conclusion, the Proposed Development is in compliance with the above-mentioned policies.</p>	
<h3>Chapter 10 - Renewable Energy and Bioeconomy</h3>	
Policy 10-1	Support and facilitate new development that will produce energy from local renewable sources such as hydro, bioenergy, wind, solar, geothermal and landfill gas, including renewable and non-renewable enabling plant, subject to compliance with normal planning and environmental criteria, in co-operation with statutory and other energy providers. The provisions of the Tipperary Renewable Energy Strategy (and any review thereof) as set out in Volume 3, will apply to new development.
Policy Objective 10-A	Support the Climate Action Plan (DECC, 2019) as it relates to renewable energy production, having consideration to the strategic importance and potential benefits of renewable energy investment to rural communities.
Policy Objective 10-C	To continue to support renewable energy development and to maintain a positive framework for development through the review of the Renewable Energy Strategy over the lifetime of the Plan



Planning Policy	Description
<p>Project Response: This Application relates to a Proposed Wind Farm Development which will deliver approx. 68.2MW or up to 185,204 MWh of electricity per annum over the lifetime of the project. Therefore, the proposal offers a significant contribution towards achieving a reduction in our carbon footprint and greenhouse gas emissions, and the local rural community will also benefit from the Community Benefit Fund, which is estimated could be in the region of circa €5.5 million over the first 15 years of the Fund, on the basis that the proposed project will generate 185,204 MWh of electricity produced per year.</p> <p>Wind farms play a vital role in Ireland’s push to meet national climate targets and strengthen energy security. By producing clean electricity, they cut greenhouse gas emissions and reduce reliance on fossil fuels. Expanding onshore and offshore wind capacity also lowers our depending on imported energy, enhancing Irelands energy security and protecting households from volatile global prices. This shift also supports Ireland’s legally binding climate targets while ensuring a more stable and affordable energy supply. Wind energy is now widely considered as the backbone of Ireland’s renewable strategy, delivering both environmental progress and greater energy independence.</p> <p>In conclusion, the Proposed Development is in compliance with the requisite policy and will further contribute towards Ireland’s renewable energy targets and ambitions.</p>	
Chapter 11 – Environment and Natural Assets	
Policy 11-1	In assessing proposals for new development to balance the need for new development with the protection and enhancement of the natural environment and human health. In line with the provisions of Article 6(3) and Article 6 (4) of the Habitats Directive, no plans, programmes, etc. or projects giving rise to significant cumulative, direct, indirect or secondary impacts on European sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan (either individually or in combination with other plans, programmes, etc. or projects ¹¹)
Policy 11-2	Ensure the protection, integrity and conservation of European Sites and Annex I and II species listed in EU Directives. Where it is determined that a development may individually, or cumulatively, impact on the integrity of European sites, the Council will require planning applications to be accompanied by a NIS in accordance with the Habitats Directive and transposing Regulations, ‘Appropriate Assessment of Plans and Projects, Guidelines for Planning Authorities’, (DEHLG 2009) or any amendment thereof and relevant Environmental Protection Agency (EPA) and European Commission guidance documents.
Policy 11-3	Ensure the conservation and protection of existing, and proposed NHAs, and to ensure that proposed developments within or in close proximity to an existing or proposed NHA would not have a significant adverse impact on the status of the site as described.

¹¹ Except as provided for in Article 6(4) of the Habitats Directive, viz. There must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the project to proceed, and c) Adequate compensatory measures in place. (Tipperary County Development Plan, 2022 – 2028).



Planning Policy	Description
Policy 11-4	<p>(a) Conserve, protect and enhance areas of local biodiversity value, habitats, ecosystems and ecological corridors, in both urban and rural areas, including rivers, lakes, streams and ponds, peatland and other wetland habitats, woodlands, hedgerows, tree lines, veteran trees, natural and semi-natural grasslands in accordance with the objectives of the National Biodiversity Plan (DCHG 2017) and any review thereof.</p> <p>(b) Safeguard, enhance and protect water bodies (rivers/canals/lakes) and river walks and to provide links, where possible, to wider green infrastructure networks as an essential part of the design process.</p> <p>(c) Require an ‘Ecosystems Services’ approach for new development to incorporate nature-based solutions to SUDS, in so far as practical, as part of water management systems, public realm design and landscaping, in line with best practice.</p> <p>(d) Where trees or hedgerows are of particular local value, the Council may seek their retention, or where retention is not feasible, their replacement and will seek a proactive focus on new tree-planting as part of new development.</p>
Policy 11-5	<p>Ensure that new developments proposed in or near ‘Ground Water Protection Schemes’ and ‘Zones of Contribution’ which contribute to public water supplies, do not result in a significant negative impact on the integrity, function and management of these important assets</p>
Policy 11-7	<p>a) Ensure the protection of water quality in accordance with the EU WFD, and support the objectives and facilitate the implementation of the associated Programme of Measures of the River Basin Management Plan 2018-2021 and any successor. This includes contributing towards the protection of Blue-Dot catchments and drinking water resources. Also, have cognisance of the EU’s Common Implementation Strategy Guidance Document No. 20 and 36 which provide guidance on exemptions to the environmental objectives of the WFD.</p> <p>b) Support an integrated and collaborative approach to catchment management in accordance with the River Basin Management Plan 2018-2021 and any successor.</p> <p>c) Require an undisturbed edge or buffer zone to be maintained, where appropriate, between new developments and riparian zones of water bodies to maintain the natural function of existing ecosystems associated with water courses and their riparian zones, and to enable sustainable public access.</p>
Policy 11-9	<p>Assess all new developments (both within and without designated Flood Risk Zones) in line with the ‘Staged Approach’ and pre-cautionary principle set out in the Planning System and Flood Risk Management Guidelines for Planning Authorities, (DEHLG, 2009) and any amendment thereof, and the following:</p>



Planning Policy	Description
	<p>(a) Require the submission of site-specific Flood Risk Assessments for developments undertaken within Flood Zones A & B and on lands subject to the mid-range future scenario floods extents, as published by the OPW. These Flood Risk Assessments shall consider climate change impacts and adaptation measures including details of structural and non-structural flood risk management measures, such as those relating to floor levels, internal layout, flood-resistant construction, flood-resilient construction, emergency response planning and access and egress during flood events.</p> <p>(b) SFRA's and site-specific flood risk assessments shall provide information on the implications of climate change with regard to flood risk in relevant locations. The 2009 OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management (or any superseding document) shall be consulted with to this effect.</p> <p>(c) Ensure each flood risk management activity is examined to determine actions required to embed and provide for effective climate change adaptation as set out in the OPW Climate Change Sectoral Adaptation Plan for Flood Risk Management applicable at the time.</p> <p>(d) Applications for development on land identified as 'benefitting land' may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas.</p> <p>(e) Require applications for new development, or for an extension to an existing development on land zoned for 'Social and Public' or 'Amenity' use and where a potential flood risk is identified, and where the proposed use might be vulnerable, to be subject to site-specific flood risk assessment to the satisfaction of the Council.</p>
Policy 11-10	<p>(a) Flood risk assessments shall incorporate consideration of climate change impacts and adaptation measures with regard to flood risk, and,</p> <p>(b) Flood risk management planning shall determine actions to embed and provide for effective climate change adaptation as set out in the OPW 'Climate Change Sectoral Adaptation Plan for Flood Risk Management' applicable at the time.</p>
Policy 11-15	<p>Support the diversification of peatlands, whilst ensuring the protection of their ecological, archaeological, cultural and educational significance in line with the National Peatlands Strategy (DAHG 2015). The Council may request landowners to prepare a 'Peatland Master Plan', especially for areas of industrial cut-over peatland, and will work with all stakeholders involved in the process in this regard. Any Masterplan should identify any significant tourism, amenity and recreation potential of these lands.</p>
Policy 11-16	<p>Facilitate new development which integrates and respects the character, sensitivity and value of the landscape in accordance with the designations of the Landscape Character Assessment, and the schedule of Views and Scenic Routes (or any review thereof). Developments which would have a significant adverse material impact on visual amenities will not be supported</p>



Planning Policy	Description
Policy 11-17	<p>Ensure the protection of the visual amenity, landscape quality and character of designated 'Primary' and 'Secondary' amenity areas. Developments which would have a significant adverse material impact on the visual amenities of the area will not be supported. New development shall have regard to the following:</p> <p>a) Developments should avoid visually prominent locations and be designed to use existing topography to minimise adverse visual impact on the character of primary and secondary amenity areas.</p> <p>b) Buildings and structures shall integrate with the landscape through careful use of scale, form and finishes.</p> <p>c) Existing landscape features, including trees, hedgerows and distinctive boundary treatment shall be protected and integrated into the design proposal.</p>
Policy 11-18	<p>Ensure that new development does not result in significant noise disturbance and to ensure that all new developments are designed and constructed to minimise noise disturbance in accordance with the provisions of the Noise Action Plan 2018 and relevant standards and guidance that refer to noise management</p>
Policy 11-19	<p>Ensure that new development does not result in significant disturbance as a result of light pollution and to ensure that all new developments are designed and constructed to minimise the impact of light pollution on the visual, environmental and residential amenities of surrounding areas.</p>
<p>Project Response:</p> <p>The Proposed Development is fully compliant with each and every one of the above policies, each of which have been addressed by various chapters throughout this EIAR which are robustly supported by the requisite and appropriate studies (for example a Flood Risk Assessment supports the Hydrology, Hydrogeology and Water Quality Chapter).</p> <p>In relation to Policy 11-1 and Policy 11-2, which sets out the requirements within Article 6(3) and Article 6 (4) of the Habitats Directive, the accompanying NIS sets out that the Proposed Development will not give rise to any significant cumulative, direct, indirect or secondary impacts on European sites. As such, the Proposed Development is in line with the outlined policies.</p> <p>Chapter 6 - Biodiversity in Volume 2 of the EIAR sets out proposed mitigation measures for biodiversity, including mitigation by avoidance, woodland re-planting, hedgerow reinstatement and water quality change control for lakes/rivers. With the proposed mitigation measures identified, and in line with the conclusions of the EIAR chapter, the Proposed Development is considered in line with the policies set out above, including Policies 11-3 and 11-4.</p>	



Planning Policy	Description
	<p>Chapter 9 - Hydrology, Hydrogeology and Water Quality in Volume 2 of the EIAR further sets out mitigation measures associated with water features, which is identified as key in the protection of NHAs through the protection of aquatic ecology. These mitigation measures include silt fences, silt bags, and timing of site construction works. With the proposed mitigation measures within this chapter, no significant effects are expected on NHAs through effects on aquatic features. The mitigation measures outlined within this EIAR chapter as well as throughout the accompanying Site Specific Flood Risk Assessment (Appendix 9.1 in Volume 3) and Surface Water Management Plan (Appendix 9.2 in Volume 3) also ensure that no significant effects are expected as a result of the Proposed Development on drainage, flood risk, or other aquatic features. Thereby, the Proposed Development is considered in line with Policies 11-3 to 11-10.</p> <p>Chapter 4 - Description of the Proposed Development in Volume 2 of the EIAR outlines the proposed amenity measures and how these interact with existing and consented amenity trails within the surrounding area. This identifies how the Proposed Development benefits tourism and diversification within the peatland in question. By its nature, the Proposed Littleton Wind Farm is a diversification of the peatland site. As such, it is considered in line with Policy 11-15 as outlined above.</p> <p>Chapter 13 - Landscape and Visual Impact in Volume 2 of the EIAR assesses the Proposed Development against landscape and visual impacts, having regard to the Tipperary Landscape Character Assessment as well as the Second and Primary Amenity Areas as designated within the Tipperary County Development Plan 2022-2028. Mitigation measures laid out in this chapter relate primarily to mitigation by avoidance and design, including buffering of residential receptors. While the central study area includes some designated scenic areas, these relate primarily to contained views. The Site and the study area within the chapter are considered to have strong working landscape values, and the landscape sensitivity of the site and central study area is considered Medium–Low, although some localised areas of higher sensitivity exist, typically associated with heritage and amenity assets. Overall, the magnitude of construction stage landscape effects within the site and its immediately surrounding context is deemed to be High-medium and of a Negative quality, but of a Short-term duration. For the operational phase of the Proposed Development, the magnitude of the landscape impact is deemed to be High-medium within the Central Study Area. Beyond 5km from the site, the magnitude of landscape impact is deemed to reduce to Low and Negligible at increasing distances as the wind farm becomes a proportionately smaller component of the overall landscape fabric. The extensive and broad scale of the underlying peatlands are considered able to accommodate larger turbines as set out in the current WEDGs. As such, the Proposed Development is considered in line with Policies 11-16 and 11-17 as set out above.</p> <p>Policy 11-18 sets out the requirements for noise disturbance, which is assessed thoroughly in Chapter 11 - Noise and Vibration in Volume 2 of the EIAR. The conclusions from this chapter confirms that the Proposed Development is in line with Policy 11-18 as set out above.</p> <p>Policy 11-19 sets out the Tipperary CDP requirements for light pollution. This is assessed within Chapter 12 - Shadow Flicker in Volume 2 of the EIAR, which sets out mitigation measures in the form of shadow flicker control measures consisting of light sensors and specialised software to mitigate shadow flicker effects. As such, the Proposed Development is considered in line with Policy 11-19 as set out above.</p>



Planning Policy	Description
Chapter 12 - Sustainable Transport	
Policy 12-2	Require new trip intensive developments to prepare and submit 'Mobility Management Plans' as part of their planning application, in line with the requirements of the Development Management Standards set out in Volume 3. An assessment of likely transport demand, and modal split shall be established, to enable a programme of monitoring as part of the Mobility Management Plan.
Policy 12-4	Maintain and protect the safety, capacity and efficiency of Tipperary's roads network and associated junctions in accordance with the Spatial Planning and National Roads Guidelines for Planning Authorities, (DECLG, 2012) and the Trans-European Networks Regulations and to avoid the creation of additional access points to national roads to which speed limits greater than 60kmh apply.
Project Response: Chapter 15 - Material Assets in Volume 2 of the EIAR contains all information in relation to the Proposed Development's Impact on Traffic and Transport. As evidenced in this Chapter no significant effects on Traffic and Transport will arise from the Proposed Development and as such it is in line with the above policy.	
Chapter 13 - Built Heritage	
Policy 13-1	<p>Safeguard sites, features and objects of archaeological interest, including Recorded Monuments, National Monuments and Monuments on the Register of Historic Monuments, and archaeological remains found within Zones of Archaeological Potential located in historic towns and other urban and rural areas. In safeguarding such features of archaeological interest, the Council will seek to secure their preservation (i.e. in situ or in exceptional circumstances preservation by record) and will have regard to the advice and recommendation of the Department of Arts, Heritage and the Gaeltacht.</p> <p>Where developments, due to their location, size or nature, may have implications for archaeological heritage, the Council may require an archaeological assessment to be carried out. This may include for a requirement for a detailed Visual Impact Assessment of the proposal and how it will impact on the character or setting of adjoining archaeological features. Such developments include those that are located at, or close to an archaeological monument or site, those that are extensive in terms of area (1/2 ha or more) or length (1 kilometre or more), those that may impact on the underwater environment and developments requiring EIA</p>
<p>Project Response: Chapter 14 - Archaeological, Architectural and Cultural Heritage in Volume 2 of the EIAR outlines all information in respect of Archaeological, Architectural and Cultural Heritage Considerations and proposes any appropriate mitigation measures.</p> <p>As detailed in this Chapter, the main concentration of identified archaeological sites identified during archaeological investigations associated with the bogs Peat Extraction are located in a narrow section of bog in the northern half of the Site, and no works are proposed in this area, highlighting the mitigation by avoidance approach employed by the Applicant from the outset. Furthermore, a review of the recorded archaeological sites and designated architectural heritage structure located within 2km of the Site revealed that there were no examples within c. 400m of the locations of any of the proposed turbines.</p>	



Planning Policy	Description
	In conclusion, the impact of the Proposed Development on Cultural Heritage assets within the surrounding environment have been assessed and the proposal mitigates any impact on these assets through avoidance. On this basis it is considered that the proposal complies with Policy 13-1 of Chapter 13 - Built Heritage of the CDP. .

4.4.1.1 Tipperary County Development Plan 2022-2028 - Tipperary Landscape Character Assessment 2016

The Tipperary Landscape Character Assessment was initially prepared for the Tipperary County Development Plan 2010 and was carried over to the Tipperary CPD 2022-2028. This provides a hierarchy of landscape units beginning with high level ‘Landscape Architypes’ then ‘Landscape Character Types’ and finally 23 geographically distinct ‘Landscape Character Areas’.

The Landscape Character Assessment divides the county into four generic landscape archetypes; ‘A – The Plains’, ‘B – The Lakelands’, ‘C – The Foothills’ and ‘D – The Uplands’. The Proposed Development is located within ‘A-The Plains’, which are described as “*working landscapes containing most settlements and services as well as large continuous areas used for pasture, tillage and peat harvesting. This landscape also contains major rivers and many historic sites.*” It is also important to note that the landscape archetype ‘C- The Foothills’ is also located throughout the central and wider study area.

In terms of ‘Landscape Character Types’ and ‘Landscape Character Areas’ the ‘Plains’ portion of the study area is further classified as the landscape character type ‘A1 – Lowland pasture & Arable’ and ‘A2 – Peatlands & Wet Mixed Farmland’ with the proposed wind farm situated in the landscape character type A2. The proposed site itself is contained across both Landscape Character Area (LCA) ‘9 - Littleton Farmland Mosaic and Marginal Peatland’ and LCA ‘8 - Littleton Raised Bog’.

LCA 8 - Littleton Raised Bog is "A distinctive raised bog area, this extends eastwards from the N8 where it meets the county boundary with Kilkenny. The raised bog is set within an overall landscape not dissimilar to the undulating lowland of the Thurles hinterland."

LCA 9 - Littleton Farmland Mosaic and Marginal Peatlands is "considered distinctive in its character as a lowland character area of the county due to its subtle differences and its sense of removal from the richer and more densely populated River Suir Central Plain. Agriculture in the area is pastoral based and productively varies greatly throughout this LCA. In the vicinity of Grange and Kilcooley the land is rich and productive, yet as one travels towards the peatlands to the North West the quality of the land is poorer."

Chapter 5 of the landscape character assessment relates to landscape sensitivity and designates LCA 8 - ‘Littleton Raised Bog’ with a ‘normal/transitional/sensitive’ sensitivity designation with the ‘sensitive’ designation being the dominant one. The dominant ‘sensitive’ designation for this landscape character area has a ‘limited’ capacity and is described as “*areas requiring significant additional care during design and assessment of alternatives to determine how established pattern of use and settlement can be accommodated*”. The objective and guideline suggested for this sensitivity designation is “*Wise Use Best Choice - Facilitate development that conclusively demonstrates wise use and best choices to continue and enhance established patterns of use and settlement without significant change to, or loss of, appearance or character.*”



LCA '9 – Littleton Farmland Mosaic and Marginal Peatland' is designated as having a 'normal/transitional/sensitive' sensitivity designation with the 'normal' designation being the dominant one. The dominant 'normal' sensitivity designation for this landscape character area has a 'high' capacity and is described as "*working landscapes with no sensitivities and established patterns of use and settlement*". The objective and guideline suggested for this sensitivity designation is to "*Continue - Facilitate development that continues established patterns of use and settlement.*"

Section 6.2 of the Tipperary Landscape Character Assessment identifies land-use compatibility between LCAs and land-use types, which are categorised in 5 layers of compatibility from 'Most' compatible to 'Least' compatible. Both LCA 8 and LCA 9 have been classified with a 'Medium' compatibility rating in respect of wind farm developments. It should be noted only 4 of the 23 landscape character areas are identified to have a compatibility rating of 'medium' or higher. Section 6.3 of the of the landscape character assessment also incorporates a land-use compatibility between landscape sensitivity factors and land-use types. The entirety of the proposed turbine array is situated within 'Peat Bogs', which is identified as having a class 3 compatibility rating with wind farms in which development is "*likely to be compatible if sited and designed with great care*".

As such, it is considered that the Proposed Development is in line with the assessments and aims set out within the Tipperary Landscape Character Assessment 2016.

4.4.2 Tipperary Renewable Energy Strategy (RES)

The Tipperary Renewable Energy Strategy (hereafter referred to as the RES) forms part of the Tipperary County Development Plan 2022 – 2028, and is included at Appendix 2 of Volume 3 of the CDP. The RES for County Tipperary was first implemented in 2016 and has been carried over to the current Development Plan. The RES is a county-wide strategy aimed to accelerate the transition to clean energy, reduce carbon emissions and align with Ireland's National Climate Goals outlined above. The overall vision of the RES is:

"To support and facilitate the development of the renewable energy sector in line with the strategic goals set out by the Department of Communications, Climate Action and the Environment whilst balancing the need for new development with the protection of the environmental, cultural and heritage assets of the county."

Chapter 4 'Renewable Resources & Potential', identifies the renewable energy resources of Tipperary which includes bioenergy, energy from waste, wind, solar, hydro and geothermal energy. It is a strategic aim of the RES to facilitate a low-carbon future in Tipperary by supporting the sustainable development of the renewable energy sector in Tipperary. In addition, the RES supports the active participation of communities in renewable energy generation.

Tipperary County Council's approach to Wind Energy is outlined in Section 6.5 of the RES and the associated Tipperary Wind Energy Strategy 2016 (the WES) (Appendix 1 of the RES), which seeks to present a vision that supports and promotes the development of wind energy development in a balanced and sustainable manner. The overarching goal of the WES states:

"It is the policy of the Council to support, in principle and in appropriate locations, the development of wind energy resources in county Tipperary. The Council recognises that there is a need to promote the development of 'green electricity' resources and to reduce fossil fuel dependency and greenhouse gas emissions in order to address the global issue of climate change, and to comply with European and International policies with regards to renewable and sustainable energy resources."



The council outlines an extensive framework of key considerations used to formulate the WES mapping, policies and objectives. This framework included the following:

- *“Wind Energy Policy Areas of Adjacent Local Authorities: The approach to planning policy for wind energy in adjoining Local Authority areas was considered. Availability and method of grid connection,*
- *Planning Application Review: The pattern of current wind development in Tipperary and adjacent areas was considered: identifying granted, pending and refused applications.*
- *Wind Energy Potential: Areas where commercial development of wind energy resources is viable were identified.*
- *Landscape Character Assessment: The outcome of the LCA and how it influences this Wind Energy Strategy was considered.*
- *Electricity Transmission Network: The capacity and accessibility to the existing and planned electricity transmission network and distribution grids were look at in relation to how they might constrain future wind energy development.*
- *Settlement Pattern and Population Densities: Settlement pattern and population densities were studied in relation to minimising the residential impact of wind energy development.*
- *Scenic Routes and Landscape Amenity Designations: The impact of wind farm development on scenic and amenity areas were considered.*
- *Landslide Susceptibility: A preliminary review of landslide risk areas based on slope and soil type was undertaken.*
- *Ecological & Natural Heritage Designations: Consideration was taken of the policy objectives and obligations in relation to any development in these areas.*
- *Architectural & Archaeological Heritage: Have consideration of the policy objectives and obligations in relation to any development in these areas.*
- *Water Framework Directive: Have consideration of the policy objectives and obligations in relation to Freshwater Pearl Mussel Catchments.*
- *Animals and Horses: Take into consideration*
- *Cumulative Impact: Consider the combined effect of all existing/granted wind farm developments in conjunction with the proposed wind energy development areas being considered under this Wind Energy Strategy process to determine if any area has an over-concentration of development.”*

4.4.2.1 Site Zoning

Map 11 of the WES (see Figure 4-1) identifies 'Areas Unsuitable' for New Wind Energy Development and 'Areas Open for Consideration' for New Wind Energy Development. The Proposed Development is located in an area zoned as 'Open for Consideration' for Wind Energy Developments (as identified by the red star on Figure 4-1 below).

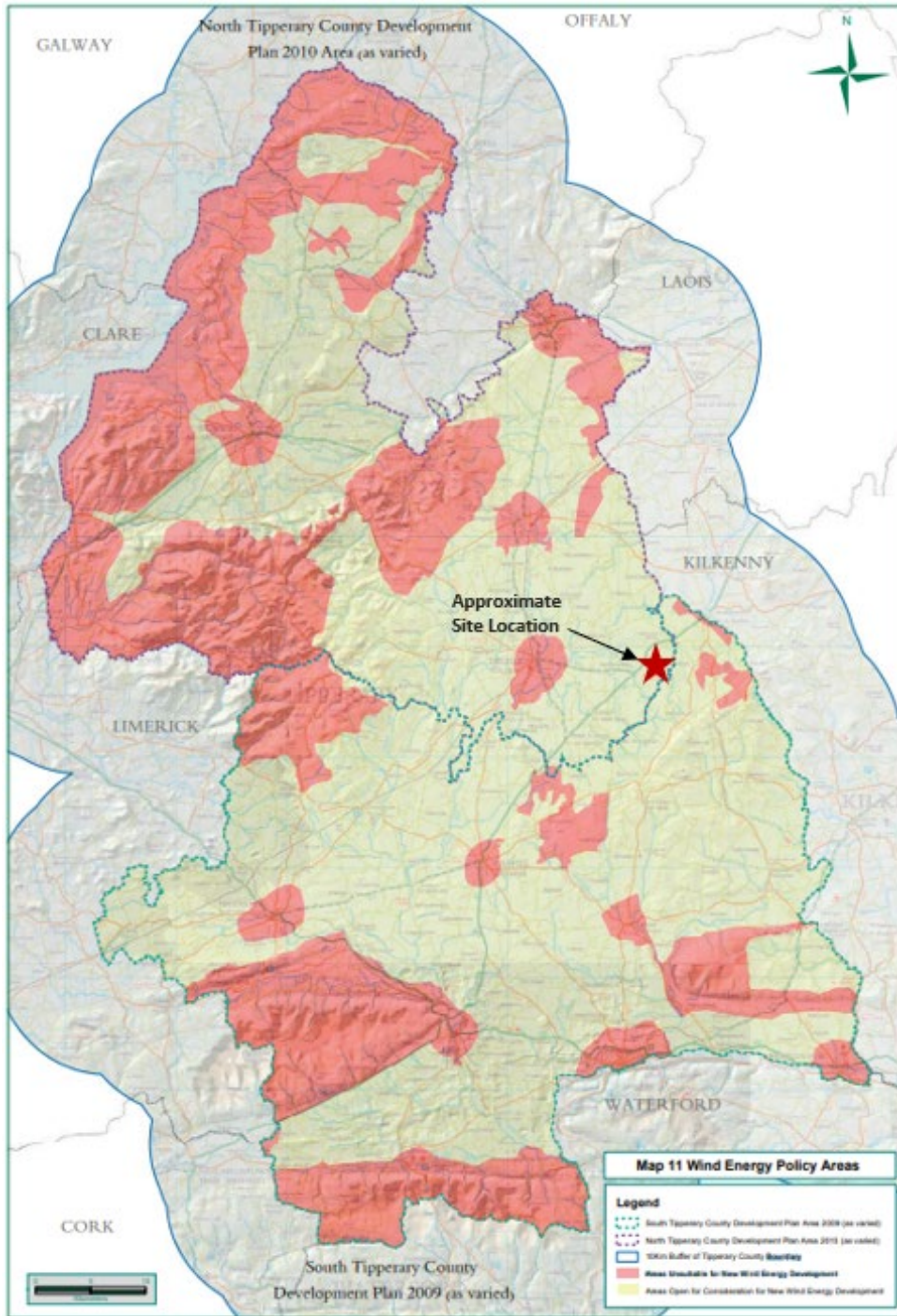


Figure 4-1: Map 11 of the Tipperary Wind Energy Strategy contained within the Tipperary Renewable Energy Strategy (Source: Tipperary County Development Plan 2022 – 2028, annotated by Fehily Timoney and Company, 2025)

Map 1 of the WES (Figure 4-2 below) outlines the Wind Energy Development Planning Applications received to date by Tipperary County Council, and details these alongside the zoned areas classified as 'Unsuitable', 'Open for Consideration' and 'Preferred' for wind energy development. The Proposed Development is located in an area deemed 'Open for Consideration', with a number of Wind Farms show as granted and constructed located to the north of the site, which also fall within the same 'Open for Consideration' zoning category.

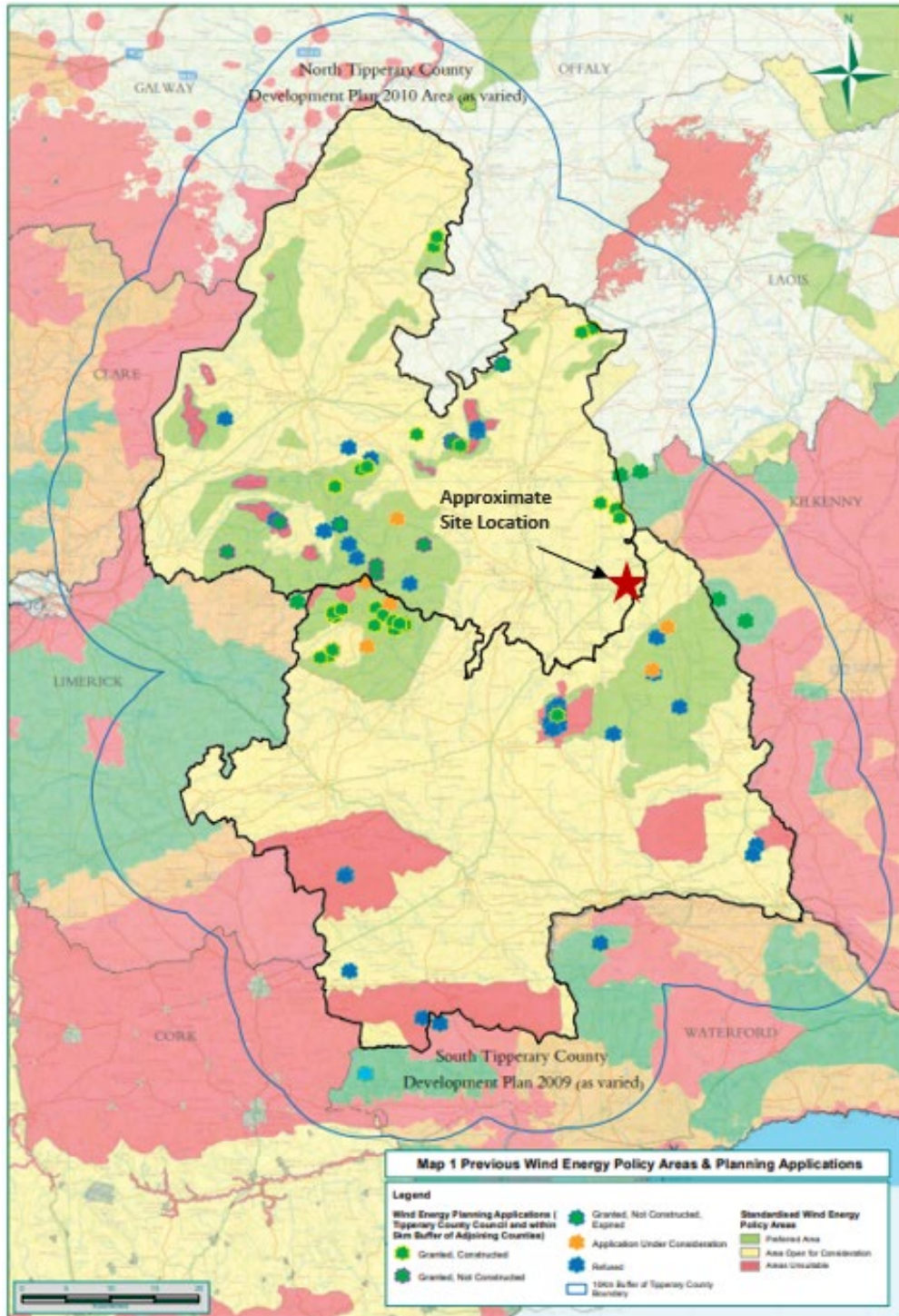


Figure 4-2: Map 1 of the Tipperary Wind Energy Strategy contained within the Tipperary Renewable Energy Strategy (Source: Tipperary County Development Plan 2022 – 2028, annotated by Fehily Timoney and Company, 2025)

The Proposed Development is located in a region that has been identified and proven suitable for renewable energy development, with the nearby clusters of operational wind farms (and SEAI Wind Energy Atlas) confirming strong wind resources and reliable grid connection options. This will contribute to strengthening regional energy security, supporting national decarbonisation goals, creating local economic opportunities and will utilise and enhance extracted peat bog areas.



The Tipperary RES and accompanying WES outlines the general policies with respect to Wind Energy Development:

Table 4-3: The Overarching Policies of the Tipperary Wind Energy Strategy 2016 – contained within the Tipperary County Development Plan 2022 – 2028

Policy/ Objective	Description
TWIND1	It is the policy of the Council to support, in principle and in appropriate locations, the development of wind energy resources in county Tipperary. The Council recognises that there is a need to promote the development of ‘green electricity’ resources and to reduce fossil fuel dependency and greenhouse gas emissions in order to address the global issue of climate change, and to comply with European and International policies with regards to renewable and sustainable energy resources.
TWIND 2	It is the policy of the Council to ensure that all wind energy development in the county complies with the provisions of all applicable government legislation and guidance on wind energy development and renewable energy resources (and any review thereof).
TWIND 3	It is the policy of the Council that when assessing planning applications for wind energy development, to require compliance with the Wind Energy Development Guidelines, Guidelines for Planning Authorities (DoEHLG) 2006 or any revision thereof, and the policy and objectives of the County Development Plan (as Varied).
TWIND 4	It is the policy of the Council to assess new wind energy development in accordance with the associated wind energy strategy map and the following parameters: Areas ‘Open for Consideration’ – wind energy development in these areas may or may not be appropriate, depending on the character of the landscape and the potential impact of the proposed development. Any impact on the environment must be low and subject to proper planning and sustainable development, and the guidelines set out in this policy document. Areas ‘Unsuitable for Further Development’ – new wind energy development in these areas is not permitted. These areas have a special or unique landscape character where the main objective is conservation. Where there are existing wind energy developments in these areas, their repowering may be considered appropriate. Any impact on the environment must be low and subject to proper planning and sustainable development, and the guidelines set out in this strategy.

The Proposed Development, which is further detailed in Chapter 4 - Development Description in Volume 2 of the EIAR, has been designed in accordance with all of the appropriate National, Regional and Local Legislative requirements including, inter alia, the Wind Energy Development Guidelines, Guidelines for Planning Authorities 2006 and the Tipperary County Development Plan 2022–2028 as described in detail throughout this Statement. Additionally, a full suite of environmental assessments have been prepared for this Planning Application including and Environmental Impact Assessment Report and Natura Impact Statement which demonstrate that the Proposed Development will have no significant effects on the environment.

As such, we believe that the Proposed Development is in accordance with the proper planning and sustainable development of the region, and also in line with the abovementioned policies set out within the Tipperary WES.



The WES goes on to outline policies in relation to areas identified as ‘Open for Consideration’ for Wind Energy Developments. These are outlined below:

Table 4-4: The Policies and Objectives of the Tipperary Wind Energy Strategy 2016 and the Project Response to each.

Policy/ Objective	Description	Chapter and Description of how the Policy has been addressed
TWIND 4.1	Proposals shall demonstrate conformity with existing and approved wind farms to avoid visual clutter. In this respect, developers should consider the cumulative impact of new development in the context of the location of both existing and permitted developments.	Please refer to Chapter 13 - Landscape and Visual Impact in Volume 2 of the EIAR which contains a full Landscape and Visual Impact Assessment. On balance, it is considered that the proposed Littleton Wind Farm would contribute to a cumulative impact of Medium magnitude in the context of the current cumulative scenario. Cumulative landscape and visual effects arising under the current cumulative scenario are assessed as Not Significant.
TWIND 4.2	Proposals in Areas ‘Open for Consideration’ shall be sited having consideration to the landscape sensitivity and capacity analysis set out in the Tipperary Landscape Character Assessment 2016 and the provisions of the County Development Plan (as varied) in relation to landscape (Chapter 7). All applications shall have regard to the visual impact of turbines and ancillary development (such as access roads, boundary fencing, control buildings and grid connections).	Please refer to Chapter 13 - Landscape and Visual Impact in Volume 2 of the EIAR which contains a full Landscape and Visual Impact Assessment, in which the Proposed Development is considered in relation to the landscape sensitivity and capacity analysis set out in the Tipperary CPD. The chapter concludes that the Proposed Development is considered in line with the Tipperary Landscape Character Assessment 2016.
TWIND 4.3	Within Areas ‘Open for Consideration’, proposed development within areas which already accommodate turbines, sub-stations and powerlines shall be considered appropriate from a sequential approach to the development of infrastructure, until these areas reach capacity.	The Proposed Development is located in an area that has been extensively developed by Wind Farms as evidenced in the list of Cumulative Assessments. Of particular note is the Lisheen Wind Farm Developments (1,2,3 and the outstanding Phase 4) located c. 15km to the North of the Site. However, it is of importance to note the lack of such development in the immediate vicinity of the Site.



Policy/ Objective	Description	Chapter and Description of how the Policy has been addressed
		As such, we believe there is capacity within the area where the Proposed Development is located and that it forms part of the sequential approach to the development of the area and its infrastructure.
TWIND 4.4	All Projects are required to be screened for Appropriate Assessment Screening in accordance with Article 6(3) of the Habitats Directive and the provisions of the County Development Plan (as varied).	An NIS (Volume 6 of the EIAR) has been prepared and submitted as part of the evidence material for this application.
TWIND 4.5	Applications for wind development shall be accompanied by a technical assessment in relation to the slope stability, landslide susceptibility of the development site and the proposed project. This assessment shall incorporate slope stability mapping and groundcover assessment in the context of potential cumulative effects arising from multiple developments.	Please refer to Chapter 8 - Land Soils and Geology in Volume 2 of the EIAR which addresses the land, soils and geology of the Site. This includes details of peat probing and a landslide susceptibility report which address this policy in full.
TWIND 4.6	All proposals for wind energy development will have regard to the cumulative effect of the development on the environment when considered in conjunction with other existing and permitted wind energy developments in the area.	This has been addressed in all chapters throughout the EIAR. The list of developments identified for cumulative assessment are outlined in Chapter 2 - Background to the Proposed Development in Volume 2 of the EIAR, and detailed in each chapter as appropriate.
TWIND 4.7	All applications will have regard to the impact on existing built environment, particularly neighbouring residential properties and other sensitive amenity areas.	<p>This has been addressed in a number of chapters throughout the EIAR, in particular Chapter 5 - Population and Human Health, and 11 - Noise and Vibration, both in Volume 2 of the EIAR.</p> <p>Due consideration has been given to sensitive receptors, with the Proposed Development designed to avoid effect on same. Additionally, extensive community consultation has been undertaken by the Design Team and Applicant throughout the preparation of the Proposed Development. This is outlined in Chapter 2 - Background to the Proposed Development in Volume 2 of the EIAR.</p>



Policy/ Objective	Description	Chapter and Description of how the Policy has been addressed
TWIND 4.8	All applications will have regard to the impact of any proposal for wind energy development on surrounding tourism and recreational related activities and the compatibility of same will be carefully considered in the assessment of any planning application.	<p>This has been addressed in Chapter 5 - Population and Human Health in Volume 2 of the EIAR. It outlines how the Design Team has carefully considered nearby recreational and tourism amenities.</p> <p>Additionally, amenity tracks and amenities are proposed as part of the Development. Please refer to Chapter 4 - Description of the Proposed Development in Volume 2 of the EIAR for further information on these.</p>
TWIND 4.9	All applications will have regard to the impact of any proposal for wind energy development in the context of any flood risk in the area. A comprehensive flood risk assessment for proposals in an area at risk of flooding, adjoining same or where cumulative impacts may result in a flood risk elsewhere, in low lying areas or in areas adjacent to streams.	This has been addressed in Chapter 9 - Hydrology, Hydrogeology and Water Quality in Volume 2 of the EIAR which included a Flood Risk Assessment.
TWIND 4.10	All applications will ensure that details of the proposed grid connection and all associated infrastructure are considered in the Environmental Impact Statement (EIA) and Natura Impact Statement as may be required.	Although the Grid Connection will be submitted as a separate planning application, the Grid Connection route and all associated infrastructure have been fully assessed as part of this EIAR and the NIS. Additionally, they have formed part of any consultation meetings, Scoping Exercises, and the Statutory Notices accompanying this Application.
TWIND 4.11	All applications will have regard to the impact on rivers and streams and will demonstrate compliance with the Water Framework Directive.	<p>This has been addressed in Chapter 9 - Hydrology, Hydrogeology and Water Quality in Volume 2 of the EIAR.</p> <p>Additionally, a full list of any proposed WFD Water Course Crossings is outlined in Chapter 4 - Description of the Proposed Development in Volume 2 of the EIAR.</p>



Policy/ Objective	Description	Chapter and Description of how the Policy has been addressed
<p>TWIND 4.12</p>	<p>Wind energy development proposed in areas of lowland raised bog/peatland shall ensure that negative impacts including habitat disturbance and loss, and avoidance of hydrological disruption and risk of erosion are avoided or mitigated through design. Site specific geo-technical investigations shall be submitted as part of EIA unless otherwise agreed with the council.</p>	<p>This has been addressed in multiple Chapters of the EIAR, including Chapter 6 - Biodiversity, 8 - Lands, Soils and Geology, and 9 - Hydrology, Hydrogeology and Water Quality, all in Volume 2 of the EIAR as well as the NIS (Volume 6).</p> <p>These chapters list a number of mitigation measures, including but not limited to mitigation by avoidance, woodland re-planting and hedgerow reinstatement. Mitigation measures for directional drilling and sediment control within the existing drains within the Site to avoid hydrological disruption and potential for erosion are also laid out. Appendix 6.1 in Volume 3 of the EIAR contains the Biodiversity Enhancement and Management Plan (BEMP), which outlines an additional 6.6 ha of tree planting to offset the loss of wooded habitats.</p> <p>These assessments and investigations have been fully detailed in the abovementioned Chapters which form part of this Planning Application.</p>

4.4.3 Kilkenny County Development Plan 2021 – 2027

The Kilkenny County Development Plan 2021 – 2027 sets out a long-term vision for sustainable balanced growth across the county, aiming to strengthen communities, support economic development, and protect the unique cultural and natural heritage of the administrative area. Its overarching ambitions include guiding compact urban development, improving infrastructure and aligning local planning with national and regional strategies such as the National Planning Framework and Regional Spatial and Economic Strategy.

Climate action is interwoven throughout the plan, with a strong emphasis on reducing greenhouse gas emissions, promoting energy efficiency, and integrating climate resilience into land-use decisions. The Plan highlights climate change as a core policy context, committing Kilkenny to sustainable settlement patterns, enhanced biodiversity, and adaption measures that safeguard the county’s environment and communities in the future.



Whilst none of the turbines associated with the Proposed Development are located within Kilkenny County Council's administrative boundary, the proposed grid connection route (which consent is not being sought for) will terminate at the Ballyragget 110kV substation in County Kilkenny and as such also partially located within this area. It is in this context that the Kilkenny County Development Plan 2021 – 2027 is discussed for the EIAR.

4.4.3.1 Grid Related Planning Policy

Section 10.3.1 and 10.3.2 of the Kilkenny County Development Plan 2021 – 2027 specifically address grid. Section 10.3.1 outlines the Council's support for grid related projects, stating that:

“The Council will support the development of a safe, secure, and reliable supply of electricity and to support and facilitate the development of enhanced electricity networks and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this plan.”

This section of the Chapter outlines a list of transmission related projects, which corresponds to the Eirgrid Strategy 2020 – 2025 which includes, inter alia, a new substation located next to the existing Ballyragget electricity substation, an upgrade to the existing Ballyragget-Kilkenny overhead line to a 110-kV standard and a new 110kV line between the Ballyragget and Proposed Coolnabackey substations. All of these items will facilitate increased capacity at the Ballyragget substation. Furthermore, it is also acknowledged that new projects may also arise to facilitate electricity demand growth and the connection of new electricity generation projects – which subtly hints towards the delivery of further renewable energy developments.

Section 10.3.2 of the KCDP outlines grid development management requirements, these are outlined in turn below:

- the development is required in order to facilitate the provision or retention of significant economic or social infrastructure;
- the route proposed has been identified with due consideration for social, environmental and cultural impacts;
- the design is such that will achieve least environmental impact;
- the lines should be planned to avoid areas of high landscape sensitivity;
- preference should be given to undergrounding services where appropriate;
- the proposed infrastructure complies with all internationally recognised standards with regard to proximity to dwellings and other inhabited structures including best practice and new accepted research on the impacts on health;
- new power lines and power installations should be sited in accordance with the requirements of the “Health Effects of Electromagnetic Fields” Report issued by the Department of Communications, Marine and Natural Resources in 2007, and
- where impacts are inevitable, mitigation features have been included.
- where considered necessary by the Council, a Visual Impact Assessment and a Landscape Impact Assessment will be required for significant Grid Infrastructural projects.
- That existing grid infrastructure should be used where possible in preference to erecting new grid infrastructure.
- Any proposed development must avoid impact on any Special Area of Conservation.



4.4.3.2 Biodiversity Policy

Chapter 9 of the Kilkenny City and County Development Plan 2021 – 2027 addresses the counties natural environment and biodiversity specifically. Of particular relevance is Section 9.2.2 which outlines the following specific Development Management Requirements:

- To ensure that development proposals, where relevant, improve the ecological coherence of the Natura 2000 network and encourage the retention and management of landscape features that are of major importance for wild fauna and flora as per Article 10 of the Habitats Directive.
- To protect and where possible enhance wildlife habitats and landscape features which act as ecological corridors/networks and stepping stones, such as river corridors, hedgerows and road verges, and to minimise the loss of habitats and features of the wider countryside (such as ponds, wetlands, trees) which are not within designated sites.
- To ensure that appropriate mitigation and/or compensation measures to conserve biodiversity, landscape character and green infrastructure networks are required in developments where habitats are at risk or lost as part of a development.

4.4.4 Project Response to Local Policy

In summary, the Proposed Development is appropriately sited for wind development, falling within lands zoned as ‘Open for Consideration’ within the WES of the Tipperary CDP 2022-2028 and is compliant with the relevant Development Plan standards.

As outlined above, this Application contains an Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) which assess the Proposed Development. The purpose of these assessments is to identify and evaluate the likely significant effects of a Proposed Development on the environment. It ensure that environmental considerations – such as effects on air, water, biodiversity, climate, population and human health – are fully understood and integrated into the planning process to support the competent authority in making an informed decision. Many of the above outlined policies refer to aspects of these assessments, and as such a cross reference to the appropriate location where they are addressed and a brief summary of how they have been addressed is included in Table 4-4 above.

As evidenced, each policy has been thoroughly addressed and as such the Proposed Development is in accordance with the RES and associated WES. Therefore, in our opinion, this Application should be looked upon favourably as the Applicant has demonstrated its compliance with the applicable Policy.

The Proposed Grid Connection is fully compliant with the Kilkenny Development Plan Policies, and whilst it does not form part of the Development for which consent is being sought, should be supported by Kilkenny County Council.

Full and due regard has been had to the Tipperary Wind Energy Strategy (WES) and the obligations therein.



5. PLANNING ASSESSMENT

Having considered the site context and development proposals in line with prevailing planning policy and guidance set out within the previous sections of this report, we consider each of these matters in turn below.

5.1 Principle of Development

It is clear from the European, National and Local Climate and Energy policy review as set out in Section 4 that Littleton Wind Farm is compatible with National and Local policy designations relating to Wind Energy Development (area zoned as being 'Open for Consideration' within the Tipperary CPD 2022-2028), and therefore the Proposed Development should be considered to accord with the proper planning and sustainable development of the area, subject to normal planning and environmental considerations. We note for completeness, that as only the grid connection is located in Kilkenny then the wind energy classification areas within the Kilkenny CDP are not relevant. The relevant infrastructural and grid connection related policies within the Kilkenny CPD have been considered, and the Proposed GC route is in line with the policies as outlined in Section 4.4.3 within this Statement.

Planning applications must be determined upon their individual merits with due consideration given to proper planning and sustainable development as well as State, Ministerial and Local policies and objectives. However, the Irish Government has made it clear that weight should be placed on the need to support climate recovery through the planning system and related consent regimes. The National Planning Policy Framework (NPPF) sets out that sustainable development is pursued in a positive way except where this would compromise the key sustainable development principles: economic, social and environmental. The Proposed Development meets each of the three principles of sustainable development as demonstrated in Table 5-1 below.

Table 5-1: The Development as Sustainable Development

Sustainable Development Principle	Accordance by the Proposed Development
<p>Economic Role</p>	<p>In addition to the benefits of energy generation carbon savings, the Proposed Development will generate wider benefits including job creation and wider socioeconomic benefits.</p> <p>The overall capital investment associated with the Proposed Development is expected to generate positive economic impacts. Additionally, there will be beneficial effects for both the local and international supply chain, contributing to wider renewable energy sector growth.</p> <p>It is considered that the construction phase will have a beneficial effect on the local economy and employment in the area through the creation of jobs, investment in local infrastructure and electrical systems, and a significant contribution of rates to the County Council over the project's lifetime.</p>



Sustainable Development Principle	Accordance by the Proposed Development
	<p>In line with Community Benefit Fund Guidelines, as governed by the Sustainable Energy Authority of Ireland (SEAI), and based on the current project scope, Littleton Wind Farm DAC will generate a <i>Community Benefit Fund</i> estimated at €5.5 million over the first 15 years of the project. The actual fund will vary slightly from year to year, depending on each year's wind conditions. The Fund will also include a Near Neighbour Scheme which will offer principal primary residents 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. In addition to these payments, this Scheme may also offer participants a contribution towards the completion of energy measures on the property and/or education support.</p> <p>If consented, the Proposed Development will provide sustainable, low carbon energy generation infrastructure in County Tipperary and County Kildare to meet Ireland's growing demand. The development benefits to the local community would include significant investment in local infrastructure and electrical systems, local job creation over the project lifetime of 35 years.</p>
<p>Social Role</p>	<p>Onshore wind development is recognised as a key technology in the energy mix which will contribute to Ireland's low carbon future as set out in the National Planning Framework (NPF). The Proposed Development would contribute to the renewable electricity and energy targets as set out in NPF and to longer term Government policy objectives and targets.</p> <p>The Proposed Development will create an opportunity to further develop the local renewable energy industry knowledge and skills base.</p> <p>During the operation of the Proposed Development, the Developer will focus on the provision of funding for community projects. This will focus on not-for-profit community enterprises, with an emphasis on low-carbon initiatives, but also local clubs, societies and other initiatives that will aim to build upon and improve economic, environmental and social requirements of local residents. The Applicant will work with the local community to gain feedback on their priorities and deliver projects that will help to support a strong, vibrant and healthy community.</p> <p>The Proposed Development has fostered an ethos of presenting a well-designed and safe built environment for the local community.</p>
<p>Environmental Role</p>	<p>The proposed layout and design approach aims to function well, making effective use of land and adding to the overall environmental quality of the area in the long term. The accompanying EIAR demonstrates that the Proposed Development fully respects the local character and identity of the environment while supporting adaptation to climate change and moving towards a low carbon economy.</p> <p>The Proposed Development is located within an area zoned as 'Open for Consideration' for Wind Energy Development within the Tipperary CDP 2022-2028.</p>



Sustainable Development Principle	Accordance by the Proposed Development
	Full and due regard has been had to the Tipperary CDP 2022-2028 and the obligations therein, and the proposal fully complies.

The Political Declaration recently adopted at the United Nations Sustainable Development Summit in New York (September 2023) reaffirmed that “climate change is one of the greatest challenges of our time”. The Declaration included the following statement:

“We stress the urgency of enhancing ambition for climate action in the implementation of the UNFCCC and the Paris Agreement in relation to climate mitigation, adaptation and the provision of the means of implementation, especially finance to developing countries. We urge the implementation of the decisions adopted at COP 27 held in Sharm El-Sheikh. We will take concrete steps toward the operationalization of the new funding arrangements for responding to loss and damage by COP 28. We commit to continuing our work to accelerate our action to address climate change. In this regard, we also look forward to the first global stock take of the Paris Agreement to take place at COP 28”.

The current failings to rise up to the climate challenge are recognised and the need for urgent action has been embedded in the Political Declaration of the United Nations, of which Ireland is a member. The requirement to enhance the ambition for climate action is a significant material matter for consideration when considering the weight that should be attributed to the substantial climate resilience benefits of the Proposed Development in determining the consent application.

5.2 Design and Layout

The approach to the consideration of alternatives and to the design of the Proposed Development has been to avoid, reduce or mitigate likely significant adverse effects in order that the Proposed Development does not impose disproportionate effects on the community and environment.

The Proposed Development has been sited and designed sympathetically to reduce potential significant effects on the environment and community. The alternative layouts of the Proposed Development were established through the project philosophy of mitigation by design. Alternative density and scales were considered, and the potential environmental effects of various alternative turbine scales and numbers were compared. Feedback from EIAR technical consultation and community engagement was also taken on board by the Applicant in the development of the design. Alternatives were also considered for other individual elements of the Proposed Development including the grid connection route and turbine delivery route. These elements were arrived at through the avoidance of potential environmental effects as detailed in the comparisons provided throughout this Statement.



The Historic Environment Viewer (HEV) lists a total of 31 recorded archaeological sites located within the Site boundary. These comprise a range of toghers (trackways) and platforms, some of which were initially identified during peat extraction works in the 1960s with additional examples identified during archaeological surveys and excavations carried out within the Site which were commissioned by Bord na Móna during the 1990s and 2000s. The majority of these sites (24 no.) were concentrated around a narrow (c.250m wide) section of the bog between the townlands of Longfordpass North and Longfordpass South in the northern half of the Site and appear to have been constructed at this location in order to take advantage of the shortest route across this area of the bog. None of the recorded archaeological sites within the Site have been assigned Preservation Orders or have been designated as National Monuments in State Care.

The layout of the Proposed Development within the Site was informed by the archaeological desktop research and fieldwork undertaken during the design and assessment phases. The mitigation measures presented in this section have been formulated based on the results of the assessment and are also informed by the nature of existing conditions within the Site. They have also been formulated in accordance with guidelines for archaeological planning conditions published in Section 7.4 of the 2006 *Wind Energy Development Guidelines* and in Section 7.6 of the 2019 *Draft Revised Wind Energy Development Guidelines*.

A suitably qualified archaeologist will be employed to monitor construction phase ground works, including advance geotechnical investigations, turbine foundations, site access tracks (including profiling for floating roads), cable trenches, compounds, under licence by the National Monuments Service (NMS) of the Department of Housing, Local Government and Heritage within overgrown areas of the Site. This will include archaeological supervision of vegetation clearance works and inspection of cleared areas in advance of ground excavation works within the Site. In the event that any archaeological sites, features or objects are identified during monitoring of ground works will halt at the relevant location, and the archaeological remains will be securely cordoned off and recorded. The NMS will then be notified and consulted to determine further appropriate mitigation measures, which may include preservation in situ by avoidance or preservation by record through a systematic, licensed archaeological excavation.

Chapter 6 - Biodiversity in Volume 2 of the EIAR outlines the ecological considerations in relation to the Proposed Development. As part of the design evolution for the Proposed Development the Design Team and the Planning and Environmental Teams worked closely together to ensure that constraints were considered from the outset, in order to formulate a development which would avoid, by design and at source, potential for significant effects.

The design and turbine layout were informed by multiple collision risk models. The findings of these CRMs were utilised to advise the layout and design alternatives considered in Chapter 3 – Consideration of Reasonable Alternatives in Volume 2 of the EIAR. As such, areas of high avian activity were considered and avoided to minimise collision risk and to avoid direct habitat loss or disturbance of primary areas used by waders and waterbirds.

The layout of roads and other associated infrastructure was purposely designed to avoid habitats of high ecological value (including wetland areas and key habitats that have developed since the implementation of the Phase 1 rehabilitation measures). Instead, infrastructure was purposely designed to be situated in low value habitat utilising natural gaps in existing vegetation to minimise vegetation and breeding habitat loss. A number of further mitigation measures to ensure no effect on avifauna are outlined within Chapter 7 - Ornithology in Volume 2 of the EIAR.



The layout and siting of the Proposed Development presented in this Planning Application, and accompanying EIAR, represents the optimum fit with the technical and environmental parameters of this project. A detailed Assessment of the design and layout of the Proposed Development is enclosed within Chapter 3 - Consideration of Reasonable Alternatives in Volume 2 of the EIAR.

5.3 Environmental Impact Assessment

A summary of the main findings of the EIAR are set out within Volume 1 - Non-Technical Summary of the EIAR. The purpose of Environmental Impact Assessment Reports is to evaluate the potential effects of a proposed project on the environment. It informs decision makers, stakeholders and the public about possible consequences and recommends measures to reduce or offset effects. The EIAR accompanying this Application was carried out over 5 years and involved 34 no. specialists (please refer to EIAR Volume 3, Appendix 1.1 for CVs). The design and EIA were developed together to ensure that the design incorporated imbedded mitigation measures as much as practically possible. It concluded that, subject to the implementation of the mitigation measures outlined within the document, there are no significant impacts arising from the Proposed Development.

The EIAR also complies fully with the EIA Directive and the Planning and Development Act 2000 (as amended).

5.4 Appropriate Assessment

With respect to European Sites within the vicinity of the Proposed Development Site, an Appropriate Assessment (AA) Screening Report and Natura Impact Statement (NIS) has been prepared by Fehily Timoney to provide the information for the competent authority, in this case An Coimisiun Pleanála, to carry out a screening assessment and, if considered applicable by An Coimisiun Pleanála an Appropriate Assessment (AA) of the Proposed Development in accordance with and in fulfilment of the requirements of Article 6 of the Habitats Directive (92/43/EEC) Further details are provided in the EIAR, AA Screening Report and NIS which accompany this planning application.

Following this examination, analysis and evaluation, it has been determined in the Screening for Appropriate Assessment (EIAR Volume 6) that the Proposed Development has potential for likely significant effects on European Site. A Natura Impact Statement was therefore prepared to support the competent authority in carrying out Appropriate Assessment.

The NIS was informed by a desktop review and a series of field surveys. It has examined and analysed, in light of the best scientific knowledge, with respect to those European sites within the zone of influence of the Proposed Development, the potential impact sources and pathways, the manner in which these could potentially impact on the European sites' Qualifying Interest (and Special Conservation Interests) and whether the predicted impacts would adversely affect the integrity of any European sites. Avoidance, design requirements and mitigation measures are set out within this NIS (and its appendices) and the effective implementation of these mitigation measures will ensure that any impacts on the conservation objectives of European sites will be avoided during the construction, operation and decommissioning Phases of the Proposed Development, such that there will be no adverse effects on any European sites.

Taking into account all matters discussed, including the implementation of the mitigation measures and recommendations fully, it has been objectively concluded that the proposed Wind Farm at Littleton will not adversely affect (either directly or indirectly) the integrity of any relevant European site in view of that site's conservation objectives.



The submitted NIS concludes that taking cognisance of measures incorporated into the project design and mitigation measures to avoid potential effects, the Project will not adversely affect the integrity of any European Site including:

- River Barrow and River Nore SAC (002162);
- The Loughans SAC (000407);
- Lower River Suir SAC (002137);
- Slieve Bloom Mountains SPA (004160);
- Slievefelim to Silvermines Mountains SPA (004165)



6. COMPLETENESS CHECK

In light of the legislative changes within the Irish Planning System transposed by S.I No. 274 of 2025 which was subsequently followed by an amending regulation S.I No. 426 of 2025 issued to correct typographical errors, concerning the new requirement for a 'completeness check' of all Applications. We enclose a copy of the ACP confirmation letter that the Proposed Development would constitute Strategic Infrastructure Development, which includes a list of information to inform the Completeness Check dated 24th March 2026 (Appendix A). A response to this Completeness Check is included in Appendix B.

The list seeks to facilitate the checks being undertaken by An Coimisiún Pleanála, and thus demonstrating full compliance of this application with the requirements recently transposed into Irish Planning Legislation by the abovementioned document and subsequent Circular Letters and Guidance.



7. CONCLUSION

In accordance with The Planning and Development Act 2000 (as amended), this Renewable Planning Statement has assessed the Proposed Development against the policy provisions set out within Tipperary County Development Plan 2022-2028.

It is considered that the proposed Littleton Wind Farm is in the national interest and of strategic importance to Ireland, as it seeks to facilitate the provision of a high quality and sustainable renewable energy project in an appropriate location. The proposal has been designed to respond to the existing context of the site, taking into account each of the technical considerations as evidenced within Volume 2 of the EIAR.

In conclusion, having regard to the:

- National and Strategic importance of the development for the Region, and Ireland as a whole;
- Provisions of the relevant policies and objectives to inform the development and design of the proposal as set out within the Tipperary County Development Plan 2022-2028;
- Provisions and targets outlined in Climate Action Policy at a Local, Regional, National, and International scale and the support for this type of development;
- Character and sensitivities of the receiving environment, as well as permitted development in the surrounding area;
- The range of environmental assessments prepared in respect of the Proposed Development as enclosed, which conclude no significant negative impacts with the implementation of proposed mitigation measures.

In our professional planning opinion, the Proposed Development:

- Is compliant with all appropriate International, National, Regional and Local policy and legislation.
- Contributes positively towards National and International Climate Commitments. It also supports Local, Regional, National and International Climate Policy and associated targets.
- Constitutes an appropriate intervention into the landscape at this location, and the principle of development at this location should be considered acceptable.
- Has been sensitively designed to ensure that it sits appropriately within its context.
- Would have a positive impact on the area.
- Provides a much-needed renewable energy development in this expanding environmentally and economically significant sector of the local and regional.

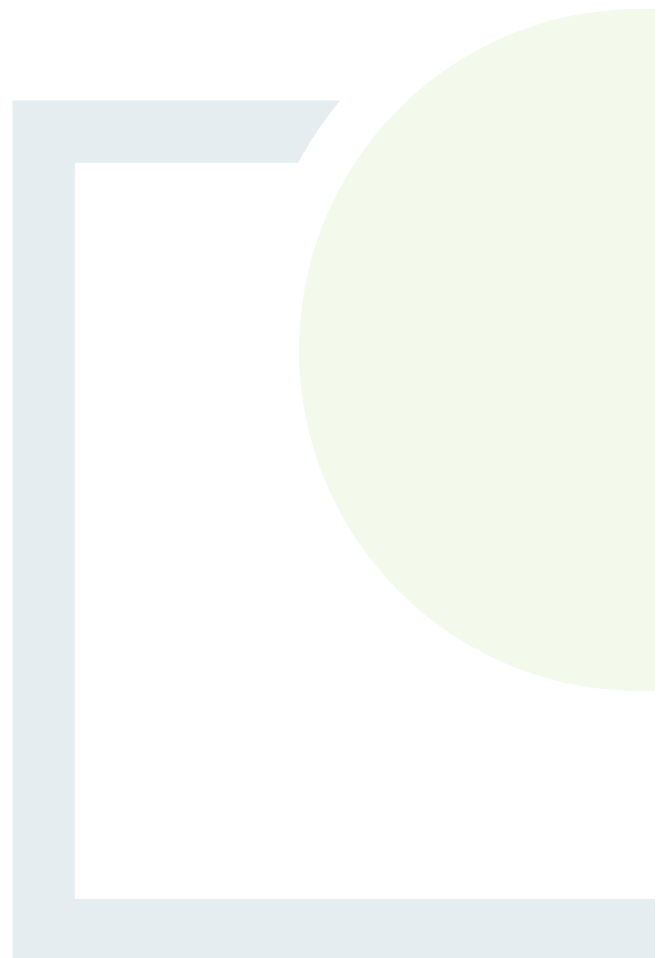
It is respectfully requested, for the reasons outlined within this Renewable Energy Planning Statement and the findings of the EIAR & NIS, that the Commission should grant planning permission for the Proposed Development as expeditiously as possible, and in any event in accordance with the time limits prescribed by the Renewable Energy Regulations.



DESIGNING AND DELIVERING
A SUSTAINABLE FUTURE

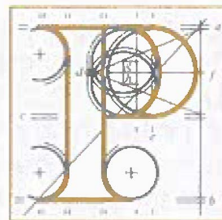
APPENDIX **A**

ACP Confirmation of SID



Our Case Number: ABP-311587-21

Your Reference: Bord na Móna Powergen Limited



An
Coimisiún
Pleanála

FEHILY TIMONEY & Co.

Fehily Timoney & Company
Rita Mansfield
Core House
Pouladuff Road
Cork
Co. Cork
T12 D773

Distribution *TB/JH*

25 MAR 2026

Job No: *PRO-211*

Correspondence No:

Comment:

Date: 24 March 2026

Re: Proposed development of between 14 and 18 no. wind turbines, 110kV on-site substation and associated connection to the national grid.
Littleton Wind Farm, Co. Tipperary.

Dear Sir / Madam,

Please be advised that following consultations under section 37B of the Planning and Development Act, 2000 as amended, the Commission hereby serves notice under section 37B(4)(a) that it is of the opinion that the proposed development falls within the scope of paragraphs 37A(2)(a), (b) and (c) of the Act. Accordingly, the Commission has decided that the proposed development would be strategic infrastructure within the meaning of section 37A of the Planning and Development Act 2000, as amended. Any application for permission for the proposed development must therefore be made directly to An Coimisiún Pleanála under section 37E of the Act.

Please also be informed that the Commission considers that the pre-application consultation process in respect of this proposed development is now closed.

Attached is,

- Appendix 1: Prescribed bodies to be notified of the application for the proposed development.
- Appendix 2: Schedule of Information which is considered necessary to submit in order to facilitate the undertaking of the Completeness Check under Section 37JA of the Planning and Development Act 2000, as amended.

In accordance with section 146(5) of the Planning and Development Act, 2000 as amended, the Commission will make available for inspection and purchase at its offices the documents relating to the decision within 3 working days following its decision. This information is normally made available on the list of decided cases on the website on the Wednesday following the week in which the decision is made.

The following information relates to challenges to the validity of a decision of An Coimisiún Pleanála under the provisions of the Planning and Development Act 2000, as amended.

Judicial review of An Coimisiún Pleanála decisions under the provisions of the Planning and Development Acts (as amended).

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Riomhphost	Email	communications@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

A person wishing to challenge the validity of a Commission decision may do so by way of judicial review only. Sections 50, 50A and 50B of the Planning and Development Act 2000 (as substituted by section 13 of the Planning and Development (Strategic Infrastructure) Act 2006, as amended/substituted by sections 32 and 33 of the Planning and Development (Amendment) Act 2010 and as amended by sections 20 and 21 of the Environment (Miscellaneous Provisions) Act 2011) contain provisions in relation to challenges to the validity of a decision of the Commission.

The validity of a decision taken by the Commission may only be questioned by making an application for judicial review under Order 84 of The Rules of the Superior Courts (S.I. No. 15 of 1986). Sub-section 50(7) of the Planning and Development Act 2000 requires that subject to any extension to the time period which may be allowed by the High Court in accordance with subsection 50(8), any application for judicial review must be made within 8 weeks of the decision of the Commission. It should be noted that any challenge taken under section 50 may question only the validity of the decision and the Courts do not adjudicate on the merits of the development from the perspectives of the proper planning and sustainable development of the area and/or effects on the environment. Section 50A states that leave for judicial review shall not be granted unless the Court is satisfied that there are substantial grounds for contending that the decision is invalid or ought to be quashed and that the applicant has a sufficient interest in the matter which is the subject of the application or in cases involving environmental impact assessment is a body complying with specified criteria.

Section 50B contains provisions in relation to the cost of judicial review proceedings in the High Court relating to specified types of development (including proceedings relating to decisions or actions pursuant to a law of the state that gives effect to the public participation and access to justice provisions of Council Directive 85/337/EEC i.e. the EIA Directive and to the provisions of Directive 2001/12/EC i.e. Directive on the assessment of the effects on the environment of certain plans and programmes). The general provision contained in section 50B is that in such cases each party shall bear its own costs. The Court however may award costs against any party in specified circumstances. There is also provision for the Court to award the costs of proceedings or a portion of such costs to an applicant against a respondent or notice party where relief is obtained to the extent that the action or omission of the respondent or notice party contributed to the relief being obtained.

General information on judicial review procedures is contained on the following website, www.citizensinformation.ie.

Disclaimer: The above is intended for information purposes. It does not purport to be a legally binding interpretation of the relevant provisions and it would be advisable for persons contemplating legal action to seek legal advice.

If you have any queries in the meantime, please contact the undersigned officer of the Commission or email sids@pleanala.ie quoting the above mentioned An Coimisiún Pleanála reference number in any correspondence with the Commission.

Yours faithfully,



Niamh Hickey
Executive Officer
Direct Line: 01-8737145

PC09

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	communications@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Appendix 1 – Prescribed bodies

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- Department of Climate, Energy and the Environment
- Department of Transport
- Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media
- Department of Agriculture, Food & Marine
- Roscommon County Council
- Tipperary County Council
- Kilkenny County Council
- Southern Regional Assembly
- Transport Infrastructure Ireland
- An Chomhairle Ealaíon (Arts Council)
- The Heritage Council
- Fáilte Ireland
- An Taisce
- Uisce Éireann
- Inland Fisheries Ireland
- Irish Aviation Authority
- Air Nav Ireland
- EPA
- HSE
- Health and Safety Authority
- The Commission for Regulation of Utilities
- ESB

- EirGrid

Further notifications should also be made, where deemed appropriate.

Appendix 2 – Schedule of Information to Inform Completeness Check

This Schedule of Information seeks to provide details which will facilitate An Coimisiún Pleanála in undertaking the Completeness Check required by Section 37JA of the Planning and Development Act 2000, as amended in order to process the application. It shall not be construed as comprising an assessment of the application documentation or a consideration of the merits of the proposed development.

Details of Proposed Development at Closure

Pre-Application Ref.	ABP-311587-21
Prospective Applicant:	BnM SSE
Date of Final Meeting:	1 st December 2025
Number of Turbines:	11 no.
Design Flexibility opinion:	No
Is Grid Connection Included:	No
Is a BESS included:	No
Accommodating works for TDR:	No

Information

Plans and Particulars	
Public Notice	<ul style="list-style-type: none"> • Time Period for Consultation and Fee for Submissions • Standalone Website Address • EIAR and NIS referenced • Reference to Section 37JA • All townlands within the site boundary to be correctly referenced.
Prescribed Bodies	<ul style="list-style-type: none"> • Notification of All Prescribed Bodies and a copy of the correspondence sent to same.

Land Ownership	<ul style="list-style-type: none"> • Interest in land • Written consent of all other landowners (<i>Inc. legally binding agreement & land registry map if required</i>)
Design Flexibility	Design flexibility not sought.
Fee	
EIA Portal	Letter from Portal
Planning Statement	<ul style="list-style-type: none"> • Renewable Energy Designation Policy Statement • Statement outlining compliance with all relevant policies and objectives in the County Development Plan including a justification for material contravention of same if relevant. • Consultation overview • Community Benefit Fund • Planning history
Drawings	<ul style="list-style-type: none"> • Drawing Schedule • Site location map • Site layout plan • Plans, elevations, sections and cross-sections • Wayleaves shown • Grid Connection Route • Scales appropriate
EIAR	
No design Flex	One turbine type (<i>tip height of 200 m, a hub height of 119 m and a rotor diameter of 162 m</i>) and grid connection to be assessed.
Non-Technical Summary	Provided as a standalone section.
Introduction	<ul style="list-style-type: none"> • Legislative context • Scoping Consultation • Community Engagement Report • Methodology/methodologies for the assessment of the environmental factors and for the description and consideration of the significance of effects • Study Area(s) and justification for same. • Project Team (Author qualifications, experience and expertise)

	<ul style="list-style-type: none"> • Technical Difficulties/Limitations
Description of the Proposed Development	<ul style="list-style-type: none"> • Detailed description (all stages) of the characteristics of the proposed development including use of natural resources, production of waste, emissions & disturbances • Construction Environmental Management Plan • Decommissioning Plan • Waste & Resource Management Plan • IPC Licence, bogland rehabilitation and establishment of baseline environment for related environmental factors.
Consideration of Alternatives	<ul style="list-style-type: none"> • Site selection & design process • Reasonable alternatives considered (Layout, scale, technologies, grid connection, turbine delivery, substation infrastructure, construction methodology, bog rehabilitation, etc)
Population and Human Health	<ul style="list-style-type: none"> • Population & Settlement Patterns • Economic Activity & Employment • Tourism & Amenities (Inc. recreational trails/waterways) • Human Health & Wellbeing (Reference Studies) • Property Devaluation/House Prices
Biodiversity	<ul style="list-style-type: none"> • Derogations (Required/Obtained) • Ecological Impact Assessment • Biodiversity Enhancement Areas/Management Plan (<i>Proposed Peat Restoration</i>) • Bat Surveys (to include): <ul style="list-style-type: none"> ○ Preliminary Roost Assessment Surveys, ○ Bat activity transect surveys, ○ Static bat detector deployments, ○ Emergence/re-entry bat roost, ○ Hibernation ○ Survey data to include a min. of 30 days in each season, in a variety of weather conditions with detectors at different height levels. • Invasive Species Management Plan • Terrestrial Surveys (<i>Habitat & ecology (inc protected flora, invasive plant species, mammals, amphibians and reptiles)</i>)

	<ul style="list-style-type: none"> • Aquatic Surveys (<i>Habitat & ecology (inc river habitat, macroinvertebrate, electro-fishing, fisheries)</i>)
Ornithology	<ul style="list-style-type: none"> • Surveys (<i>Vantage Point, Breeding & non-breeding, hinterland, Dusk, Walkover, Roost & Winter surveys</i>) • Connectivity with European Sites • Collision Risk Model (CRM) Assessment • Monitoring Programme • Cumulative Assessment
Noise and Vibration	<ul style="list-style-type: none"> • Baseline Noise Levels • Map of all receptors within 4 x Tip of Turbines • Predicted Noise Levels • Proposed Noise Limits (cumulative) • Operational Noise Monitoring Proposal • Mitigation Strategy for Operational Amplitude Modulation and Tonal Noises • Cumulative Noise Assessment
Shadow Flicker	<ul style="list-style-type: none"> • Shadow Flicker Analysis • Wind Turbine Control Measures
Air and Climate	<ul style="list-style-type: none"> • Carbon Impact Assessment including Embodied Energy Assessment and Climate Change Vulnerability Assessment • Dust Generation/Emissions and Management • Vehicle Emissions and Management
Land, Soils & Geology	<ul style="list-style-type: none"> • Ground Condition Assessment (inc): <ul style="list-style-type: none"> ○ Ground Investigations Report ○ Site Investigations Report ○ LIDAR Survey ○ On site precipitation monitoring and use of climate data ○ Ground and surface water monitoring (<i>using piezometres</i>) and in-situ hydraulic conductivity testing. ○ Slope Stability Analysis (<i>Justification of model employed. Deterministic model recommended</i>). • Peat and Spoil Management Plan

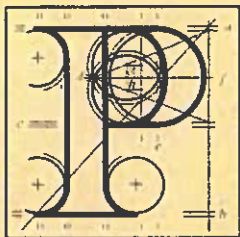
Hydrology, Hydrogeology & Water Quality	<ul style="list-style-type: none"> • Hydrological Assessment • Hydrogeological Assessment • Flood Risk Assessment • Surface water/Drainage Management Plan • Standalone Water Framework Directive Compliance Report • Emergency Response Plan • Water Quality Management Plan • Drinking Water Source (UE and GWSS) Assessment
Landscape & Visual	<ul style="list-style-type: none"> • Photomontages • ZTV Analysis (20km radius from development site) • Landscape Character Assessment • Viewpoint Assessment
Traffic & Transportation	<ul style="list-style-type: none"> • Turbine Delivery Route & Swept Path Analysis • Haul Route & Swept Path Analysis • Traffic and Transport Assessment • Traffic Management Plan (including Construction traffic) • Stage 1 Road Safety Audit • Design Report (TII requirements)
Material Assets	<ul style="list-style-type: none"> • Gas/ESB networks • Telecommunications Impact Study • Aviation Review Statement • Any other relevant material assets identified in consultation process
Cultural Heritage	<ul style="list-style-type: none"> • Heritage Impact Assessment & a Historic Landscape Character Assessment • Archaeological Impact Assessment
Major Accidents and Disasters	<ul style="list-style-type: none"> • Construction Stage • Operational Stage • Impact of Climate Change
Cumulative Assessment	<p>Projects considered should be clearly identified and the location of the cumulative assessment clearly labelled within each Chapter as relevant.</p>
Interactions of the Foregoing	<p>Description of interactions between factors.</p>

<p>Compendium of Mitigation Measures</p>	<p>Intent expressed for the implementation of mitigation measures to be clearly set out as – ‘shall’.</p> <p>Commitments need to be expressed clearly and be specific.</p>
<p>Appendices</p>	<p>All appendices and sub appendices to be submitted in hard and soft copy. To include:</p> <ul style="list-style-type: none"> • Glossary of Terms • Noise Survey Results & Calibration Certificates • Material Volume Calculations • Statement of Competency • Other relevant documents
<p>AA Screening report</p>	<ul style="list-style-type: none"> • Author qualifications, experience and expertise • Methodology • Zone of Influence (ZOI) and identification of relevant European Sites to be based on a Source-Pathway-Receptor Model using the precautionary principle • Must include consideration of: Lower River Suir SAC, River Barrow and River Nore SAC, and The Loughans SAC (grid connection).
<p>NIS</p>	<ul style="list-style-type: none"> • Author qualifications, experience and expertise • Methodology • Collision Risk Modelling (CRM) • Biodiversity & Ornithology Surveys for QI & SCI species and habitats in accordance with Best Practice • Consideration of relevant Land, soils & geology reports/assessments* • Consideration of relevant Hydrological, hydrogeological & water reports/assessments* • Compendium of Mitigation Measures (<i>Intent expressed for implementation of mitigation measures – ‘shall’</i>) <p>* As stipulated above for EIAR.</p>
<p>Appendices</p>	<p>All appendices and sub appendices to be submitted in hard and soft copy.</p>

Other Documents (To include):

Civil Engineering Report

- Site Entrances
- Access Tracks
- Wind turbines
- Cable routes & connections
- Substation (Compound & Buildings)
- Meteorological Mast
- Temporary construction compounds
- Borrow Pits & Deposition Areas
- Haul Route
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- Surface Water Design
- Wastewater
- Potable Water
- Decommissioning & Restoration



An
Coimisiún
Pleanála

Direction
CD-022034-26
ABP-311587-21

The submissions on file and the inspector's report were considered at a Commission Meeting held on the 23/03/2026. The Commission generally agreed with the Inspector's recommendation as indicated hereunder.

REASONS AND CONSIDERATIONS

Having regard to the size, scale and location of the proposed development and related development, and to the policy context, it is considered that the proposed development comprising the development of an 11 no. turbine wind farm, and all associated infrastructure including a 110kV on-site substation, located in the townlands of Littleton, Longfordpass North, Kilmakill, Longfordpass East, Longfordpass South, Leigh, Bawnreagh, Clonoura, Noard, Derryhogan, Derryvella, Ballybeg, Lanespark and Killeen, County Tipperary constitutes development that falls within the definition of energy infrastructure in the Seventh Schedule of the Planning and Development Act 2000, as amended, thereby satisfying the requirements set out in Section 37A(1) of the Act.

The proposed development is also considered to be of strategic importance by reference to the requirements of Section 37A(2)(a), 37A(2)(b) and 37A(2)(c) of the Planning and Development Act 2000, as amended.

An application for permission for the proposed development must therefore be made directly to An Coimisiún Pleanála under Section 37E of the Act.

Appendix 1 – Prescribed bodies

- Department of Housing and Local Government and Heritage
- Department of Climate, Energy and the Environment
- Department of Transport
- Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media
- Department of Agriculture, Food & Marine
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- Tipperary County Council
- Kilkenny County Council
- Southern Regional Assembly
- Transport Infrastructure Ireland
- An Chomhairle Ealaíon (Arts Council)
- The Heritage Council
- Fáilte Ireland
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- EPA
- HSE
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Further notifications should also be made, where deemed appropriate.

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Fee	
EIA Portal	Letter from Portal
Planning Statement	<ul style="list-style-type: none"> • Renewable Energy Designation Policy Statement • Statement outlining compliance with all relevant policies and objectives in the County Development Plan including a justification for material contravention of same if relevant. • Consultation overview • Community Benefit Fund • Planning history
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	<ul style="list-style-type: none"> • Peat and Spoil Management Plan
Hydrology, Hydrogeology & Water Quality	<ul style="list-style-type: none"> • Hydrological Assessment • Hydrogeological Assessment • Flood Risk Assessment • Surface water/Drainage Management Plan • Standalone Water Framework Directive Compliance Report • Emergency Response Plan • Water Quality Management Plan • Drinking Water Source (UE and GWSS) Assessment
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Cumulative Assessment	Projects considered should be clearly identified and the location of the cumulative assessment clearly labelled within each Chapter as relevant.

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Compendium of Mitigation Measures	<p>Intent expressed for the implementation of mitigation measures to be clearly set out as – 'shall'.</p> <p>Commitments need to be expressed clearly and be specific.</p>
Appendices	<p>All appendices and sub appendices to be submitted in hard and soft copy. To include:</p> <ul style="list-style-type: none"> • Glossary of Terms • Noise Survey Results & Calibration Certificates • Material Volume Calculations • Statement of Competency • Other relevant documents
AA Screening report	<ul style="list-style-type: none"> • Author qualifications, experience and expertise • Methodology • Zone of Influence (ZOI) and identification of relevant European Sites to be based on a Source-Pathway-Receptor Model using the precautionary principle • Must include consideration of: Lower River Suir SAC, River Barrow and River Nore SAC, and The Loughans SAC (grid connection).
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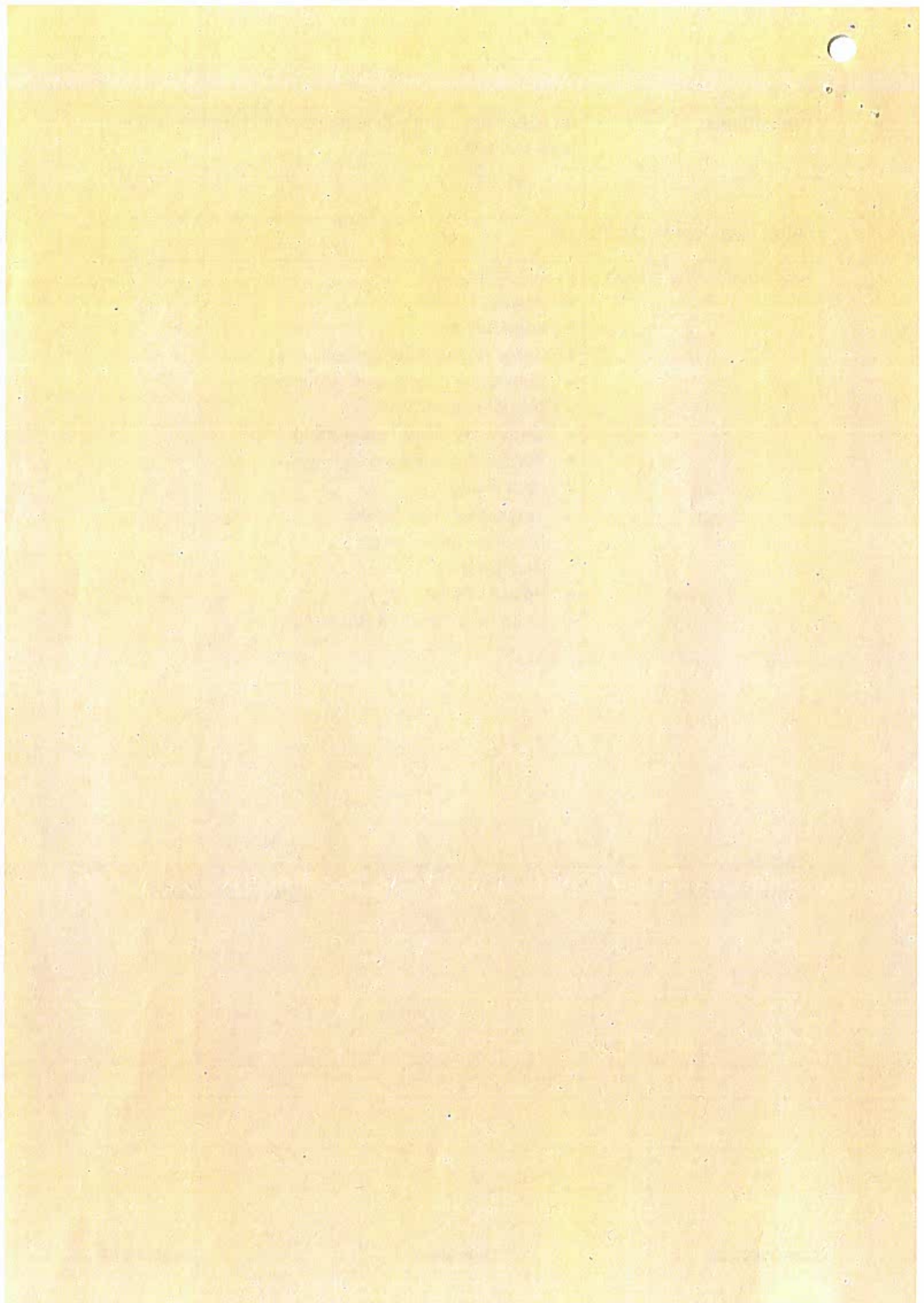
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**Planning
Commissioner:**



Tom Rabbette

Date: 23/03/2026

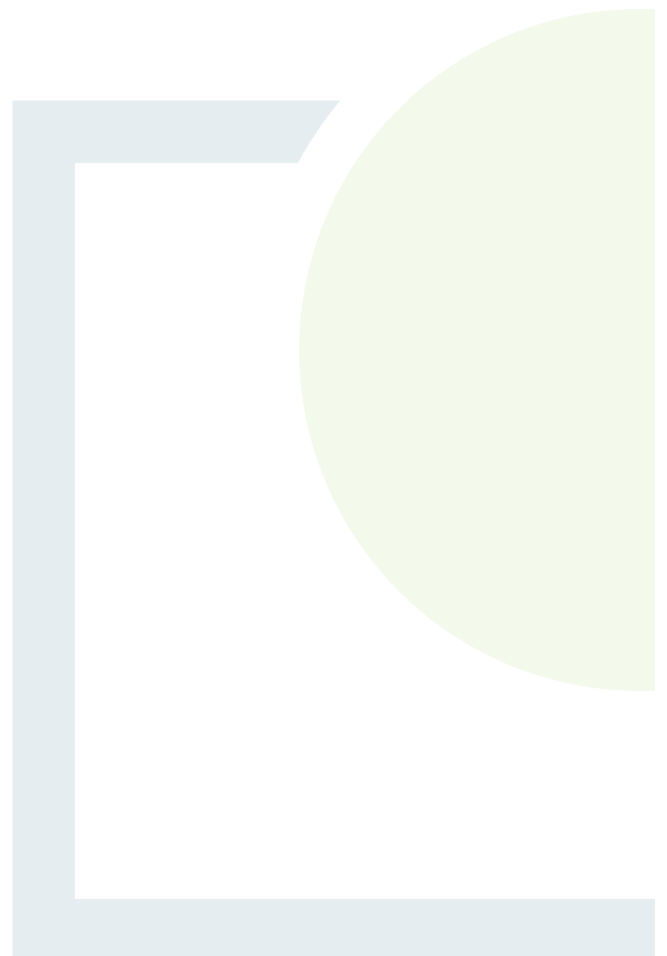




DESIGNING AND DELIVERING
A SUSTAINABLE FUTURE

APPENDIX B

Completeness Check
Response



Requirement	N/A	Yes	No	Note
Plans and Particulars				
Public Notice				
Time Period for Consultation and Fee for Submissions		✓		The time period for consultation and fee for submissions has been included on the public notices.
Standalone Website Address		✓		Reference to the standalone website has been included on the public notices.
EIAR and NIS referenced		✓		Reference to the EIAR and NIS has been included on the public notices.
Reference to Section 37JA		✓		Reference to Section 37JA has been included on the public notices.
All townlands within the site boundary to be correctly referenced.		✓		All townlands within the site boundary have been correctly referenced in the planning notices and associated application material where necessary.
Prescribed Bodies				
Notification of All Prescribed Bodies and a copy of the correspondence sent to same.		✓		Prescribed Bodies specified at conclusion of pre-application consultation have been notified and a copy of correspondence sent to same is included as Addendum F of the SID Application Form.
Land Ownership				
Interest in Land		✓		The proposed development site is under the ownership of Bord na Móna Energy Ltd and 2 no. third party landowners who have given consent to include their lands within the application site boundary, please see Addendum B of the SID Application Form.
Written consent of all other landowners (including legally binding agreement and land registry map if required)		✓		All necessary letters of consent have been provided for all land included within the redline boundary, please see Addendum B of the SID Application Form.
Design Flexibility				
Design Flexibility not sought	✓			Design flexibility is not sought.

Requirement	N/A	Yes	No	Note
Fee				
Details of appropriate fee payment		✓		The correct fee of €100,000 has been paid to An Coimisiún Pleanála. See Addendum F of the SID Application Form for more details.
EIA Portal				
Letter from Portal		✓		Confirmation of EIA Portal ID 2026098 has been included with this application in Addendum G of the SID Application Form.
Application Form				
Complete form to be submitted		✓		The completed SID Application Form and relevant addendums have been submitted.
Planning Statement				
Renewable Energy Designation Policy Statement		✓		Please refer to section 4.4.2 of the Renewable Energy Planning Statement included with this application.
Statement outlining compliance with all relevant policies and objectives in the County Development Plan including a justification for material contravention of same if relevant.		✓		Please refer to section 4 of the Renewable Energy Planning Statement included with this application. This outlines the compliance of the proposed development with relevant Development Plan Policies and Objectives.
Consultation overview		✓		This is addressed in Section 3.6 of the Renewable Energy Planning Statement deals with this. Further detail on consultation can be found within Chapter 2 of the EIAR.
Community Benefit Fund		✓		This is addressed in Section 3.7 of the Renewable Energy Planning Statement and Section 4.8 of EIAR Chapter 4: Description of the Proposed Development. A Community Engagement Report is also provided as Appendix 2.3 of the EIAR.
Planning history		✓		This is addressed in Section 2.2 of the Renewable Energy Planning Statement and Section 2.3 of EIAR Chapter 2: Background.

Requirement	N/A	Yes	No	Note
Drawings				
Drawing Schedule		✓		A Drawing Schedule has been provided with the application drawings pack and as Addendum A of the SID application form.
Site location map		✓		A Site Location Map has been provided with the application drawings pack.
Site layout plan		✓		A Site Layout Plan has been provided with the application drawings pack.
Plans, elevations, sections and cross-sections		✓		Plans, elevations, sections and cross-sections have been provided with the application drawings pack, as necessary.
Wayleaves shown		✓		All relevant wayleaves have been provided on the site location plans in the application drawings pack.
Grid Connection Route		✓		Whilst consent is not sought for the grid connection route as part of this application, details of same in Figure 4.3 of Volume 4 of the EIA as well as in Appendix 4.3 of the EIA.
Scales appropriate		✓		All scales have been agreed with An Coimisiún Pleanála.
EIA				
No Design Flex				
One turbine type (tip height of 200 m, a hub height of 119 m and a rotor diameter of 162 m) and grid connection to be assessed.	✓			Design Flexibility is not sought in this application.
Non-Technical Summary				
Provided as a standalone section.		✓		The Non-Technical Summary (NTS) of the EIA has been provided in a standalone section (Volume 1).
Introduction				
Legislative context		✓		The legislative context has been covered throughout EIA Chapter 1: Introduction and EIA Chapter 2: Background to the Proposed Development.
Scoping Consultation		✓		This is addressed in Section 2.4 of EIA Chapter 2: Background.

Requirement	N/A	Yes	No	Note
Community Engagement Report		✓		A Community Engagement Report is provided as Appendix 2.3 of the EIAR.
Methodology /methodologies for the assessment of the environmental factors and for the description and consideration of the significance of effects		✓		The description of likely significant effects methodology is detailed Section 1.8 of EIAR Chapter 1: Introduction, and the methodologies for the impact assessment topics of the EIAR are detailed in a dedicated methodology section in the relevant EIAR Chapters and Appendices.
Study Area(s) and justification for same.		✓		The description of each discipline study area and associated justifications is detailed in a dedicated study area section in the relevant EIAR Chapters and Appendices. The cumulative study area and justification are contained in Section 2.3.1 of Chapter 2: Background of the EIAR and detailed in all chapters of the EIAR.
Project Team (Author qualifications, experience and expertise)		✓		Each discipline specific EIAR chapter provides the required statement of authority. Additionally, Appendix 1.1 provides the Curricula Vitae of each EIAR author.
Technical Difficulties/Limitations	✓			Section 1.10 of Chapter 1: Introduction of the EIAR outlines that there were no difficulties encountered during the preparation of this EIAR. Any technical limitation or difficulty, if experienced, is detailed in the relevant EIAR Chapter.
Description of the Proposed Development				
Detailed description (all stages) of the characteristics of the proposed development including use of natural resources, production of waste, emissions & disturbances		✓		Provided in EIAR Chapter 4: Description of the Proposed Development and its 3 no. Supporting Appendices.
Construction Environmental Management Plan		✓		Included as Appendix 4.1 of the EIAR.

Requirement	N/A	Yes	No	Note
Decommissioning Plan		✓		This is described in Section 4.3.8 of Appendix 4.1: Construction Environmental Management Plan as well as Section 4.7 of Chapter 4: Description of the Proposed Development.
Waste & Resource Management Plan		✓		This is described in Section 4.3.6 of Appendix 4.1: Construction Environmental Management Plan
IPC Licence, bogland rehabilitation and establishment of baseline environment for related environmental factors.		✓		Provided in EIAR Chapters 1: Introduction an 2: Background to the Proposed Development and Appendix 2.1 – Rehabilitation Plans / Reports
Consideration of Alternatives				
Site selection & design process		✓		Assessed in Section 3.3.3 of EIAR Chapter 3 – Consideration of Reasonable Alternatives
Reasonable alternatives considered (Layout, scale, technologies, grid connection, turbine delivery, substation infrastructure, construction methodology, bog rehabilitation, etc)		✓		Assessed in Section 3.3 of EIAR Chapter 3 – Consideration of Reasonable Alternatives.
Population and Human Health				
Population & Settlement Patterns		✓		Provided in Section 5.6.1 of EIAR Chapter 5: Population and Human Health.
Economic Activity & Employment		✓		Provided in Section 5.6.2 of EIAR Chapter 5: Population and Human Health.
Tourism & Amenities (Inc. recreational trails/waterways)		✓		Provided in Section 5.6.4 of EIAR Chapter 5: Population and Human Health.

Requirement	N/A	Yes	No	Note
Human Health & Wellbeing (Reference Studies)		✓		Provided in Section 5.6.7 of EIAR Chapter 5: Population and Human Health.
Property Devaluation/House Prices		✓		Assessed in Section 5.7.5.3 of Chapter 5: Population and Human Health.
Biodiversity				
Derogations (Required/Obtained)	✓			No Derogations were required for this development.
Ecological Impact Assessment		✓		Provided in Section 6.9 of Chapter 6: Biodiversity of the EIAR
Biodiversity Enhancement Areas/Management Plan (Proposed Peat Restoration)		✓		Provided as Appendix 6.1 of the EIAR and detailed on Site Layout Plans.
Bat Surveys (to include): - Preliminary Roost Assessment Surveys, - Bat activity transect surveys, - Static bat detector deployments, - Emergence/re-entry bat roost, - Hibernation - Survey data to include a min. of 30 days in each season, in a variety of weather conditions with detectors at different height levels.		✓		Provided as Appendix 6.3 of the EIAR and in Section 6.5.4.4 of EIAR Chapter 6: Biodiversity.
Invasive Species Management Plan		✓		Provided as Appendix 6.4 of the EIAR.

Requirement	N/A	Yes	No	Note
Terrestrial Surveys (Habitat & ecology (inc protected flora, invasive plant species, mammals, amphibians and reptiles))		✓		Provided in Section 6.5.4 of EIAR Chapter 6: Biodiversity.
Aquatic Surveys (Habitat & ecology (inc river habitat, macroinvertebrate, electro-fishing, fisheries))		✓		Provided as Appendix 6.2 of the EIAR and in Section 6.5.4.8 of EIAR Chapter 6: Biodiversity.
Ornithology				
Surveys (Vantage Point, Breeding & non-breeding, hinterland, Dusk, Walkover, Roost & Winter surveys)		✓		The bird survey effort is outlined in Appendix 7.1 and in Section 7.5.4 of Chapter 7: Ornithology the EIAR..
Connectivity with European Sites		✓		Provided in Section 7.8.2 of Chapter 7: Ornithology the EIAR. A standalone NIS and AASR is also included as part of this application.
Collision Risk Model (CRM) Assessment		✓		Provided as Appendix 7.2 of the EIAR.
Monitoring Programme		✓		Provided in Section 7.9.3.1 and 7.9.3.2 of Chapter 7: Ornithology the EIAR.
Cumulative Assessment		✓		Provided in Section 7.8.2 of Chapter 7: Ornithology the EIAR.
Noise and Vibration				
Baseline Noise Levels		✓		Provided in Section 11.3.2.1 of Chapter 11: Noise and Vibration as well as Appendix 11.1 of the EIAR.
Map of all receptors within 4 x Tip of Turbines		✓		Included as Figure 11.1 of Volume 4 of the EIAR.
Predicted Noise Levels		✓		Detailed in Section 11.4 of Chapter 11: Noise and Vibration and Appendix 11.5 of the EIAR.
Proposed Noise Limits (cumulative)		✓		Detailed in Section 11.3.7.2 of Chapter 11: Noise and Vibration of the EIAR.

Requirement	N/A	Yes	No	Note
Operational Noise Monitoring Proposal		✓		Detailed in Section 11.6 of Chapter 11: Noise and Vibration of the E.I.A.R.
Mitigation Strategy for Operational Amplitude Modulation and Tonal Noises		✓		Detailed in Section 11.2.3 to 11.2.5 and 11.6.2.1.1 of Chapter 11: Noise and Vibration of the E.I.A.R.
Cumulative Noise Assessment		✓		Detailed in Section 11.4.5 of Chapter 11: Noise and Vibration and Appendix 11.6 of the E.I.A.R.
Shadow Flicker				
Shadow Flicker Analysis		✓		Chapter 12 in Volume 2 of the E.I.A.R assesses Shadow Flicker. There are also 2 no. associated appendices (12.1 - Total Theoretical Shadow Times per Receptor 12.2 - Total Theoretical Shadow Times per Turbine in Volume 3)
Wind Turbine Control Measures		✓		Control measures are outlined in Section 12.5 of Chapter 12 of the E.I.A.R.
Air and Climate				
Carbon Impact Assessment including Embodied Energy Assessment and Climate Change Vulnerability Assessment		✓		Included in Section 10.4.4 of E.I.A.R Chapter 10: Air Quality and Climate as well as Appendix 10.1 and Section 5.7.16.2 of Chapter 5: Population and Human Health.
Dust Generation/Emissions and Management		✓		Assessed in Section 10.5.1.1 of E.I.A.R Chapter 10: Air Quality and Climate.
Vehicle Emissions and Management		✓		Assessed in Section 10.4.5.1 and 10.6.1 of E.I.A.R Chapter 10: Air Quality and Climate.
Land, Soils and Geology				
Ground Condition Assessment (inc): - Ground Investigations Report		✓		- Detailed in Appendix 8.1 Geotechnical and Peat Stability Assessment Report

Requirement	N/A	Yes	No	Note
<p>- Site Investigations Report</p> <p>- LIDAR Survey</p> <p>- On site precipitation monitoring and use of climate data</p>				<p>-Included in Section 8.3.7 of EIAR Chapter 8: Land, Soils and Geology as well as Appendices E to G of the Geotechnical and Peat Stability Assessment Report (Appendix 8.1 in Volume 3).</p> <p>- LiDAR survey data was used in the desk study for the site. Refer to Section 8.3.6 of EIA Chapter 8: Land, Soils and Geology.</p> <p>- See section 9.3.2 Chapter 9: Hydrology, Hydrogeology and Water Quality of the EIAR Historic data from the site has been reported, this station closed in 1982. Average Annual Rainfall (AAR) grid data has been included. Met Éireann also provide a grid of AAR for the entire country for the period of 1991 to 2020. Additionally, Chapter 9 refers to climate change estimates. Separately Rainfall Return Period Depths for the site (based on Met Eireann) data is also provided, refer to Table 9-6 in Chapter 9: Hydrology, Hydrogeology and Water Quality of the EIAR. It is these data that are used for drainage design.</p> <p>- Site specific Site Investigation included in Appendix 8.1 and 8.2. GW monitoring at the proposed substation and Borrow Pit is referenced in Section 9.3.9.1.1 of Chapter 9: Hydrology, Hydrogeology and Water Quality of the EIAR. No site-specific hydraulic conductivity(permeability) testing was completed, none would be expected on this low-lying site as there is limited risk of ground instability.</p>

Requirement	N/A	Yes	No	Note
- Ground and surface water monitoring (using piezometres) and in-situ hydraulic conductivity testing. - Slope Stability Analysis (Justification of model employed. Deterministic model recommended).				- Refer to Appendix 8.1 which is a Geotechnical and Peat Stability Assessment – Section 7.1 of Appendix 8.1 provides details on the model used.
Peat and Spoil Management Plan		✓		Included as Appendix 8.2 in Volume 3 of the EIAR
Hydrology, Hydrogeology and Water Quality				
Hydrological Assessment		✓		Provided within Section 9.2.4 9.3 of EIAR 9: Hydrology, Hydrogeology and Water Quality.
Hydrogeological Assessment		✓		Provided within Section 9.2.4 9.3 of EIAR 9: Hydrology, Hydrogeology and Water Quality.
Flood Risk Assessment		✓		A Site Specific Flood Risk Assessment Report has been included as Appendix 9.1 of the EIAR.
Surface Water / Drainage Management Plan		✓		A Surface Water Management Plan has been provided as Appendix 9.3 of the EIAR, which contains mitigation and monitoring measures related to water quality.
Standalone Water Framework Directive Compliance Report		✓		A Standalone Water Framework Directive Compliance Report has been provided as Appendix 9.2 of the EIAR.
Emergency Response Plan		✓		Included as Section 6 of Appendix 4.1
Water Quality Management Plan		✓		A Surface Water Management Plan has been provided as Appendix 9.3 of the EIAR, which contains mitigation and monitoring measures related to water quality.

Requirement	N/A	Yes	No	Note
Drinking Water Source (UE and GWSS) Assessment		✓		See Section 9.3.15 of Chapter 9: Hydrology, Hydrogeology and Water Quality of the EIAR for baseline, and Section 9.4.2.1.10/9.4.2.2.5 Chapter 9: Hydrology, Hydrogeology and Water Quality of the EIAR for impact assessment with mitigation and residual effects in corresponding sections further on in the chapter.
Landscape and Visual				
Photomontages		✓		Included as EIAR Volume 5 Photomontage Booklet
ZTV Analysis (20 km radius from development site)		✓		Included in Section 13.3.2 of Chapter 13: Landscape and Visual Impact of the EIAR
Landscape Character Assessment		✓		Included in Section 13.3.1.3.2 of Chapter 13: Landscape and Visual Impact of the EIAR
Viewpoint Assessment		✓		Included in Section 13.8 of Chapter 13: Landscape and Visual Impact of the EIAR
Traffic and Assessment				
Turbine Delivery Route and Swept Path Analysis		✓		The turbine delivery route is detailed in Section 4.4.3 of Chapter 4: Description of the Proposed Development and Section 15.5.4.4.1 of Chapter 15: Material Assets of the EIAR. The swept path analysis is provided in Appendix 4.2 of the EIAR.
Haul Route and Swept Path Analysis		✓		The construction haul routes for the construction phase of the Proposed Project are detailed in Section 15.5.4.4.2 of Chapter 15: Material Assets of the EIAR.
Traffic and Transport Assessment		✓		A Traffic and Transport Assessment is provided in Section 15.5 of Chapter 15: Material Assets of the EIAR
Traffic Management Plan (including construction traffic)		✓		This is contained within Section 4.3.7 of Appendix 4.1: Construction Environmental Management Plan.
Stage 1 Road Safety Audit	✓			Refer to Section 15.5.2 of EIAR Chapter 15: Material Assets which confirms that no road safety issues were identified as part of the traffic and transport assessment, and the proposed access arrangements comply with the relevant TII standards.

Requirement	N/A	Yes	No	Note
				Other than the standard mitigation measures required for the construction and operation of the access points, no additional safety concerns arise. Therefore, the Proposed Development does not require a Road Safety Audit under TII guidance.
Design Report (TII Requirements)		✓		Refer to Section 15.5.4.3.1 of Chapter 15:Material Assets which confirms that no road safety issues were identified as part of the traffic and transport assessment, and the proposed access arrangements comply with the relevant TII standards.
Material Assets				
Gas / ESB Networks		✓		Provided in Section 15.4.3 of Chapter 15: Material Assets of the EIAR
Telecommunications Impact Study		✓		Provided in Appendix 15.1 of the EIAR as well as section 15.7 of Chapter 15: Material Assets.
Aviation Review Statement		✓		Provided in Appendix 15.2 and 15.3 of the EIAR as well as section 15.6 of Chapter 15: Material Assets.
Any other relevant material assets identified in consultation process	✓			No other relevant material assets identified during the consultation process. EIAR scoping responses are set out in Tables 2.6 and 2.7 of Chapter 2: Background to the Proposed Development. All relevant feedback material addressed in Chapter 15: Material Assets.
Cultural Heritage				
Heritage impact assessment and historic landscape character assessment		✓		Refer to Section 13.4 and 13.5 of EIAR Chapter 14: Archaeological, Architectural and Cultural Heritage
Archaeological impact assessment		✓		Refer to Section 13.4 and 13.5 of EIAR Chapter 14: Archaeological, Architectural and Cultural Heritage
Major Accidents and Disasters				
Construction Stage		✓		Included in Section 5.7.16.2 of Chapter 5: Population and Human Health.
Operational Stage		✓		Included in Section 5.7.16.2 of Chapter 5: Population and Human Health.

Requirement	N/A	Yes	No	Note
Impact of Climate Change		✓		Included in Section 10.4.3 of EIAR Chapter 10: Air Quality and Climate as well as Appendix 10.1 and Section 5.7.16.2 of Chapter 5: Population and Human Health.
Cumulative Assessment				
Projects considered should be clearly identified and the location of the cumulative assessment clearly labelled within each Chapter as relevant.		✓		A list of cumulative developments is included as Appendix 1.2. Cumulative assessment of projects and plans has been incorporated throughout all impact assessment chapters with each EIAR chapter outlining the methodology and cumulative assessment study area in a dedicated section.
Interactions of the Foregoing				
Description of interactions between factors.		✓		Contained within Chapter 16, Volume 2 of the EIAR.
Compendium of Mitigation Measures				
Intent expressed for the implementation of mitigation measures to be clearly set out as – 'shall'.		✓		Intent clearly defined with terms such as “shall” or “will” throughout the EIAR.
Commitments need to be expressed clearly and be specific.		✓		Mitigation measures are specified and detailed throughout all relevant chapters of the EIAR and associated appendices. Chapter 17: Schedule of Mitigation and Monitoring Measures of the EIAR provides all mitigation and monitoring measures for the Proposed Project
Appendices				
All appendices and sub appendices to be submitted in hard and soft copy. To include: • Glossary of Terms		✓		<ul style="list-style-type: none"> - A Glossary of terms has been included as Appendix 1.3 of the EIAR. - Noise Survey Results and Calibration Certificates are included as Appendix 11.1 and Appendix 11.2 of the EIAR, respectively. - Material Volume Calculations are included in Appendix 8.2 of the EIAR.

Requirement	N/A	Yes	No	Note
<ul style="list-style-type: none"> • Noise Survey Results & Calibration Certificates • Material Volume Calculations • Statement of Competency • Other relevant documents 				<ul style="list-style-type: none"> - A statement of authority has been included at the beginning of each EIAR chapter, and project team and competency of author included in Appendix 1.1.
AA Screening Report				
Author qualifications, experience and expertise		✓		Included in Section 1.2 of the NIS/AASR
Methodology		✓		Included in Section 1.3 of the NIS/AASR
Zone of Influence (ZOI) and identification of relevant European Sites to be based on a Source-Pathway-Receptor Model using the precautionary principle		✓		Table 3.1 of the NIS/AASR identifies Natura 2000 sites within the ZOI and is based on a Source-Pathway-Receptor Model using the precautionary principle
Must include consideration of: Lower River Suir SAC, River Barrow and River Nore SAC, and The Loughans SAC (grid connection).		✓		These sites are considered in the NIS/AASR.
NIS				
Author qualifications, experience and expertise		✓		Included in Section 1.2 of the NIS/AASR
Methodology		✓		Included in Section 1.3 of the NIS/AASR
Collision Risk Modelling (CRM)		✓		A collision risk model has been prepared for the Project (following NatureScot Collision Risk Model (CRM), also

Requirement	N/A	Yes	No	Note
				known as the Band model (Band, 2024 / NatureScot, 2024), Appendix 7.2 of the EIAR details this. The NIS assessed the impacts related to this.
Biodiversity & Ornithology Surveys for QI & SCI species and habitats in accordance with Best Practice		✓		Survey methodologies are in accordance with best practice and detailed in Section 1.3.1 of the NIS/AASR
Consideration of relevant Land, soils & geology reports/assessments* <i>* As stipulated above for EIAR.</i>		✓		Land Soils and Geology reports have been considered in the NIS/AASR.
Consideration of relevant Hydrological, hydrogeological & water reports/assessments* <i>* As stipulated above for EIAR.</i>		✓		All hydrological, hydrogeological and water reports/assessments included in the EIAR have been considered and are detailed throughout the NIS/AASR.
Compendium of Mitigation Measures (Intent expressed for implementation of mitigation measures – 'shall')		✓		Included in Section 4.2 of the NIS/AASR.
Appendices				
All appendices and sub appendices to be submitted in hard and soft copy.		✓		All appendices and sub appendices have been submitted in soft and hard copies

Requirement	N/A	Yes	No	Note
Other Documents (to Include)				
Civil Engineering Report				
Site Entrances		✓		Provided in Section 4.4.1.2.1 of Chapter 4: Description of the Proposed Development of the EIAR. Drawings provided in planning drawing pack – Drawing Nos. P20-211-0101-0001 to P20-211-0101-0004.
Access Tracks		✓		Provided in Section 4.4.1.2.2 of Chapter 4: Description of the Proposed Development of the EIAR. Drawings provided in planning drawing pack – Drawing Nos. P20-211-0600-0013 to P20-211-0600-0018.
Wind Turbines		✓		Provided in Section 4.4.1.1 of Chapter 4: Description of the Proposed Development of the EIAR. Drawings provided in planning drawing pack – Drawing Nos. P20-211-0100-0004 to P20-211-0100-0077 and P20-211-0102-0004 to P20-211-0102-0006
Cable Routes and Connections		✓		Provided in Section 4.4.2 of Chapter 4: Description of the Proposed Development of the EIAR and in Appendix 4.3.
Substation (Compound and Buildings)		✓		Provided in Section 4.4.1.8 of Chapter 4: Description of the Proposed Development of the EIAR. Drawings provided in planning drawing pack – Drawing Nos. P20-211-0102-0001, P20-211-0102-0002, P20-211-0102-0014, P20-211-0102-0015, P20-211-0102-0017 and P20-211-0102-0018.
Meteorological Mast		✓		Provided in Section 4.4.1.3 of Chapter 4: Description of the Proposed Development of the EIAR. Drawings provided in planning drawing pack – Drawing No. P20-211-0102-0008
Temporary Construction Compounds		✓		Provided in Section 4.5.9 of Chapter 4: Description of the Proposed Development of the EIAR. Drawings provided in planning drawing pack – Drawing Nos. P20-211-0102-0007, P20-211-0102-0009 and P20-211-0102-0013

Requirement	N/A	Yes	No	Note
Borrow Pits and Deposition Areas		✓		Provided in Section 4.4.1.5 of Chapter 4: Description of the Proposed Development of the EIAR. Drawings provided in planning drawing pack – Drawing Nos. P20-211-0600-0019 to P20-211-0600-0022
Haul Route		✓		The construction haul routes for the construction phase of the Proposed Project are detailed in Section 15.5.4.4.2 of Chapter 15: Material Assets of the EIAR. Figure 15.2 of Volume 4 of the EIAR also shows the haul routes.
Turbine Delivery Route		✓		Figure 4.4 of Volume 4 of the EIAR also shows the turbine delivery route. The turbine delivery route is detailed in Section 4.4.3 of Chapter 4: Description of the Proposed Development and Section 15.5.4.4.1 of Chapter 15: Material Assets of the EIAR. The swept path analysis is provided in Appendix 4.2 of the EIAR.
Surface Water Design		✓		Provided in Section 4.5.7 Chapter 4: Description of the Proposed Development of the EIAR. Drawings provided in planning drawing pack – Drawing Nos. P1617-1_D101 to P1617-1_D112
Wastewater		✓		Provided in Section 4.5.9 and 4.4.1.8 Chapter 4: Description of the Proposed Development of the EIAR. 2 no. wastewater holding tanks will be provided outside the substation compound fence line so that it can be maintained where required without requiring access to the substation compound. The wastewater holding tank will be a sealed storage tank with all wastewater tankered off site as required by an authorised waste collector to a wastewater treatment plant. The temporary construction compounds will have portable toilets with sealed contained foul drainage holding tanks. Refer also to planning drawing number P20-211-0102-0016

Requirement	N/A	Yes	No	Note
Potable Water		✓		Provided in Section 4.4.1.8 Chapter 4: Description of the Proposed Development of the EIAR. 2 no. bored wells are proposed which will provide water to the substation. Refer also to planning drawing number P20-211-0102-0001
Decommissioning and Restoration		✓		Provided in Section 4.7 of Chapter 4: Description of the Proposed Development of the EIAR and provided in Appendix 4.1 to the EIAR.



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