Environmental Impact Assessment Report (EIAR)

Ballydermot Wind Farm, Co. Offaly & Co. Kildare - EIAR

Chapter 2 Background to the Proposed Project

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GLOSSARY OF TERMS

Terms	Definition
Carbon Budgets	The maximum cumulative amount of greenhouse gas emissions that can be released into the atmosphere while limiting global warming to a specified level, between 1.5 and 2 degrees
Climate Action and Low Carbon Development (Amendment) Act	Ireland's legally binding framework which aims to achieve a climate-neutral economy by 2050, requiring a 51% reduction in greenhouse gas emissions by 2030
Climate Action Plan	National framework document for measuring, tracking and reducing greenhouse gas emissions and adopting climate adaptation measures.
European Green Deal	An EU policy launched in 2019, aiming to cut emissions by at least 50% by 2030, rising towards 55%, while legally binding the 2050 neutrality goal through the European Climate Law.
Kyoto Protocol	An international treaty adopted in December 1997, requiring industrialised nations to reduce GHG emissions based on principle of common but differentiated responsibilities
National Energy Projections	Predictions of future energy use in Ireland under different scenarios and account for factors such as economic growth
National Energy Security Framework	Policy document produced by Irish government to provide an overarching and comprehensive response to Ireland's energy security needs in the context of the war in Ukraine.
National Planning Framework	A long-term, 20-year strategy for strategic planning and sustainable development of urban and rural areas to 2040, with the core objectives of securing balanced regional development and a sustainable 'compact growth,' approach to the form and pattern of future development.
Paris Agreement	A legally binding international treaty adopted in 2015 to combat climate change, aiming to limit global temperature rise to well below 2 degrees, preferably 1.5 degrees above pre-industrial levels
Renewable Energy Directive	An EU Directive which aims to accelerate the EU's renewable energy transition and promote energy independence
REPowerEU	A European Commission plan launched in May 2022 to rapidly reduce dependence on Russian fossil fuels and to accelerate the green energy transition following Russia's invasion of Ukraine.
The Climate Change Advisory Council	An Independent advisory body providing evidence-based advice and recommendations on policy to support Ireland's just transition to a biodiversity rich, environmentally sustainable, climate neutral and resilient society.

United Nations Framework Convention on Climate Change	1992 International Treaty aimed at stabilising atmospheric greenhouse gas concentrations to prevent dangerous human-induced climate interference
Wind Energy Development Guidelines	Guidelines released by the Irish government in 2006 to offer advice to planning authorities on planning for wind energy through the development plan process and in determining applications for planning permission. The guidelines are intended to ensure a consistency of approval.

GLOSSARY OF ACRONYMS

Acronym	Meaning
AA	Appropriate Assessment
ACP	An Coimisiún Pleanála
BAI	Broadcasting Authority of Ireland
C	Carbon
CAP	Climate Action Plan
CARO	Climate Action Regional Office
CCAC	Climate Change Advisory Council
CER	Commission for Energy Regulation
CH4	Methane
CLO	Community Liaison Officer
CO_2	Carbon Dioxide
COP	Conference of Parties
CRU	Commission for Regulations of Utilities
DCCAE	Department of Communications, Climate Action and Environment
DCENR	Department of Communications, Energy and Natural Resources
DECC	Department of the Environment, Climate and Communications
DOC	Dissolved Organic Carbon
DoEHLG	Department of Environment, Heritage and Local Government
DoHPLG	Department of Housing, Planning and Local Government
EIAR	Environmental Impact Assessment Report
EIS	Environmental Impact Statement
EMRA	Eastern and Midland Regional Assembly
EPA	Environmental Protection Agency
ESR	Effort Sharing Regulation
ETS	Emissions Trading Scheme
EU	European Union
GHG	Greenhouse Gas
GIS	Geographic Information System
GST	Global Stocktake
ICCA	Ireland's Climate Change Assessment
IEA	International Energy Agency
IPC	Integrated Pollution Control
IPCC	Intergovernmental Panel on Climate Change
IWEA	Irish Wind Energy Association

KCC	Kildare County Council
KCDP	Kildare County Development Plan
LCA	Landscape Character Assessment
LCEP	Local Economic and Community Plans
LNG	Liquefied Natural Gas
LVIA	Landscape and Visual Effects
MS	Microsoft Teams
MW	Megawatts
NDP	National Development Plan
NEROS	Network Monitoring Rewetted and Restored Peatlands/Organic Soils for Climate and Biodiversity Benefits
NGO	Non-Governmental Organisation
NIS	Natura Impact Statement
NMS	National Monument Service
NPF	National Planning Framework
NPWS	National Parks and Wildlife Service
NSO	National Strategy Outcome
OCC	Offaly County Council
OCDP	Offaly County Development Plan
PAS	Plans to Accelerate Solutions
PCAS	Peatland Climate Action Scheme
REC	Renewable Energy Community
RED	Renewable Energy Directive
rEIAR	Remedial Environmental Impact Assessment Report
RESS	Renewable Electricity Support Scheme
rNIS	Remedial Natura Impact Statement
RPOs	Regional Policy Objectives
RSES	Regional Spatial and Economic Strategies
SEAI	Sustainable Energy Authority Ireland
SID	Strategic Infrastructure Development
TDP	Transmission Development Plan
UN	United Nations
UNFCCC	United Nations Framework Convention on Climate Change
WAM	With Additional Measures
WEM	With Existing Measures
WES	Wind Energy Strategy
WFD	Water Framework Directive
WHO	World Health Organisation
WMO	World Meteorological Organisation

2. BACKGROUND TO THE PROPOSED PROJECT

2.1 Introduction

This chapter of the EIAR presents the relevant energy and climate change related policy and targets along with the strategic, regional, and local planning policies relevant to the Proposed Ballydermot Wind Farm (the Proposed Project). It also summarises consultation carried out including the EIA scoping exercise and the pre-planning and community consultation undertaken. An overview of the Project Site's planning history along with planning applications for wind energy projects within 25km is also provided. The chapter concludes with an overview of the cumulative impact assessment process undertaken in relation to the Proposed Project. This chapter should be read in conjunction with the Planning Report which accompanies the planning application.

The Proposed Project is being brought forward in response to local, regional, national and European policy regarding Ireland's transition to a low-carbon economy, associated climate change policy objectives and to reduce Ireland's dependence on imported fossil fuels for the production of electricity.

As detailed in Section 1.1.1 of Chapter 1 of this EIAR the various project components are described and assessed using the following references: 'Proposed Project', 'Proposed Enhancement Areas', 'Proposed Construction Haul Routes', 'Proposed Turbine Delivery Route', 'Project Site', 'Proposed Wind Farm', 'Proposed Turbines', 'Proposed Grid Connection', 'Proposed Onsite Substation', and 'Proposed Offsite Substation'. A detailed description of the Proposed Project is provided in Chapter 4 of this EIAR. The Proposed Wind Farm site refers to the area encompassing the 14-no. Allen Bog Group bogs which form part of the Project Site.

As the anticipated installed capacity of the Proposed Project is c. 322MW and is above the Strategic Infrastructure Development (SID) threshold of 50MW, the application for the Proposed Project will be made to the An Coimisiún Pleanála ('ACP', the 'Commission') under Section 37E of the Planning and Development Act 2000 (as amended) ("the Planning Act"). Additionally, the planning application will encompass all elements of the Proposed Project, including the 220kV grid connection infrastructure to connect to the national grid via loop-in from the existing Maynooth-Dunstown 220kV overhead line in the townland of Killybegs in Co. Kildare.

2.1.1 Statement of Authority

MKO has developed extensive expertise and experience over the last 15 years in preparing Background and Planning Policy Context Chapters for a range of projects, including multiple large scale wind energy development.

This chapter was led by Ronan Dunne of MKO with support from Shikha Gajula and review from Sean McCarthy. Ronan Dunne is a Project Planner with MKO with over 3 years of experience in private practice. Ronan holds a BSc (Hons) in City Planning and Environmental Policy, and a MSc (Hons) in Urban and Regional Planning from University College Dublin where he focused his studies on wind energy development. Since joining MKO, Ronan has been involved in a range of infrastructure projects, including onshore and offshore wind, solar, battery storage and grid infrastructure developments. In his role as a Project Planner, Ronan works with multidisciplinary teams including members from MKO's Environmental, Ecological and Ornithological departments as well as sub-contractors from various fields in the develop/deliver reports to facilitate the planning process. Through his professional and academic experience, Ronan has gained skills in renewable energy planning, Environmental Impact Assessment, strategic and spatial planning, development management, planning appeals, condition compliance, and project management.

Shikha Gajula is a Planner with MKO. Shikha holds a Bachelor's degree in Architecture (B.Arch) and a Master's degree in Planning and Development from the University of Galway. Prior to taking up her position with MKO, Shikha worked across multiple sectors. As a licensed architect, she contributed to design and documentation at Katerra Design Pvt Ltd, gaining experience in technical drawings, site analysis and barrier-free design. Since joining MKO, Shikha has been involved in a range of projects, including wind farm and grid infrastructure developments. She has also contributed to research examining wind farm repowering in Ireland for the DCEE. Through her academic background and professional practice, Shikha has gained experience in renewable energy planning, Environmental Impact Assessment, strategic and spatial planning and public participation process.

Sean McCarthy is a Project Director in the Planning Team at MKO with over 10 years of experience in both private practice and local authorities. Sean holds a BSc. (Hons) in Property Studies from ATU and a Masters in Regional & Urban Planning for Heriot Watt University in Edinburgh. Prior to taking up his position with McCarthy Keville O'Sullivan in September 2015, Sean worked as a Planning Officer with the Western Isles Council in Scotland in the UK and prior to that worked as a Graduate Planner with Tipperary County Council. Sean is a chartered member of the Royal Town Planning Institute with extensive experience in residential, commercial, renewable energy, industrial, quarries and healthcare development projects. Sean has been involved in complex and large-scale development projects from inception through to planning permission both as a project manager and working as part of wider design teams. Sean has extensive experience in working on Strategic Housing Development Projects, Large Scale Residential Development Projects and EIAR projects. Within MKO, Sean plays a large role in the management of staff and works as part of a large multi-disciplinary team to produce planning applications.

2.1.2 Renewable Energy Resources

Renewable energy resources are replenished through the cycles of nature, unlike fossil fuels, which are finite resources that are becoming increasingly scarce and expensive to extract. Renewable energy resources offer a sustainable alternative to fossil fuels, a means of reducing greenhouse gas (GHG) emissions and opportunities to reduce reliance on imported fuels.

A gradual shift towards increasing Ireland's use of renewable energy is no longer viable if Ireland is to meet its climate obligations and legally binding emissions reduction targets. There is an urgency now to ensure real changes occur without delay. Renewable energy development is recognised as a vital component of Ireland's strategy to tackle the challenges of combating climate change and ensuring a secure supply of energy. Ireland is heavily dependent on the importation of fossil fuels to meet its energy needs. In 2024, 79.5% of Ireland's energy was imported from abroad[1], far higher than the European Union (EU) 2024 average of 57.3%[2]. This high dependency on energy imports leaves Ireland vulnerable both in terms of meeting future energy needs and ensuring price stability. Expanding indigenous renewable energy supply is critical for energy security and price stability. The provision of the Proposed Project would aid in decarbonising the electricity sector and bolstering energy security in Ireland.

2.1.3 Need for the Proposed Project

Ireland's Climate Action Plan 2025 sets ambitious targets for renewable energy generation, including 9GW of onshore wind capacity by 2030 –with at least 6GW to be delivered by 2025– and an 80% share of renewable electricity by the same year. However, multiple assessments, including the Climate Change Advisory Council (CCAC) Annual Review 2025 and the Environmental Protection Agency

[1] *Energy in Ireland - 2026 Report (Sustainable Energy Authority of Ireland, October 2026)* https://www.seai.ie/sites/default/files/publications/Energy-in-Ireland-2026-Part-1.pdf
[2] *EU energy import dependency (Eurostat, March 2026)* https://ec.europa.eu/eurostat/web/products-eurostat-news/w/wdn-20260318-1

(EPA) emissions projections[3], confirm that Ireland is not on track to meet these targets. Significant gaps remain in renewable energy deployment, particularly in grid capacity expansion, as well as onshore and offshore wind energy development, while continued reliance on fossil fuels threatens national and EU climate commitments.

Failure to meet binding EU targets will expose Ireland to financial penalties, increased carbon credit costs, and continued dependence on fossil fuel imports - posing serious risks to energy security and economic stability. Furthermore, Ireland's national interest, as outlined in Section 143(1) of the Planning Act requires the rapid expansion of renewable energy, making this a matter of strategic economic and social importance.

Renewable energy projects play a crucial role in meeting Ireland's climate targets. The approval of well-planned, appropriately located renewable energy projects, such as the Proposed Project is imperative. Without decisive action to facilitate renewable energy deployment, Ireland risks missing national and EU commitments, incurring financial penalties, and undermining energy security.

Please see the accompanying Planning Report and Section 1.6 of Chapter 1 of this EIAR for further information on the need for the Proposed Project.

2.2 Climate Change Policy and Targets

International and national policy consistently identifies the need to reduce GHG emissions and stresses the importance of limiting global warming. Over the past 30 years, international climate policy has evolved in response to the growing scientific evidence on climate change, leading to increasingly ambitious targets, objectives, and legislative measures to address the climate emergency globally and within Ireland. The Intergovernmental Panel on Climate Change (IPCC)'s Sixth Assessment Report[4] published in 2021 provides a stark assessment of global climate change and presents evidence that climate change will increase in all regions of the globe over the coming decades and that much of the damage caused by climate change up to this point is now likely irreversible, such as the rise in sea levels over the course of the 21st century.

The Synthesis Report[5] of the IPCC Sixth Assessment Report published in March 2023 summarises the state of knowledge of climate change, its widespread impacts and risks. The Synthesis Report states that *'continued global warming is projected to further intensify the global water cycle, including its variability, global monsoon precipitation, and very wet and very dry weather and climate events and seasons'*. The IPCC's projections are evident in extreme climate events occurring across the world.

According to the World Meteorological Organisation's (WMO) 'State of the Global Climate Report 2025' published in March 2026[6], atmospheric concentration of carbon dioxide reached its highest level in the last 2 million years. Levels of methane and nitrous oxide reached their highest levels in the last 800,000 years in 2025. The year 2025 was the second or third warmest year in the 176-year observational record, depending on which of nine datasets is used. The year 2024 remains the warmest year in all the datasets, at 1.55 °C ± 0.13 °C above the 1850–1900 average[7].

[3] *Ireland's Greenhouse Gas Emissions Projections 2025–2030 (EPA, May 2026)* https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA-GHG-Projections-2025-2030-Web.pdf
[4] *Climate Change 2021 'The Physical Science Basis' (Intergovernmental Panel on Climate Change, August 2021)*
[5] *Climate Change 2023 Synthesis Report (IPCC)* https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_FullVolume.pdf
[6] *State of the Global Climate 2025 (World Meteorological Organisation, March 2026)* https://wmo.int/publication-series/state-of-global-climate/state-of-global-climate-2025
[7] *State of the Global Climate 2025 (World Meteorological Organisation, March 2026)* https://wmo.int/publication-series/state-of-global-climate/state-of-global-climate-2025

"The European State of the Climate Report 2025" produced by WMO and European Union[8] indicated that:

- The current level of global warming is estimated to be around 1.4°C above the pre-industrial level.
- Europe saw its second most severe heatwave on record, while sub-Arctic Fennoscandia experienced its longest heatwave on record.
- Wildfire burnt area and fire emissions both reached record levels. The largest contributions came from fires across the Iberian Peninsula in August.
- The annual sea surface temperature for the European ocean region was the highest on record and a record 86% of the region experienced at least 'strong' marine heatwave conditions.
- Glaciers in all European regions saw a net mass loss. In 2025, the total global glacier mass loss was about 410 Gt, equivalent to 1.1 mm of sea level rise.
- 2025 saw strong regional contrasts in hydrological conditions. Storms and flooding affected some areas, but overall extreme precipitation and flooding were less widespread than in recent years.

The *"Annual Climate Statement for 2025"* produced by MET Eireann[9], similarly reflects on impacts arising from climate change effects within an Irish context:

- The average annual air temperature for Ireland in 2025 *(using the Island of Ireland dataset*)* was 11.14 °C, which is 1.59°C above the 1961-1990 long-term average (LTA) or 0.97°C above the most recent 1991-2020 LTA.
- This makes 2025 the second warmest year on record, which is only slightly behind the warmest year in 2023 (11.21 °C) and only the second time with a mean temperature over 11 °C.
- The last 4 years (2022-2025) are now the 4 warmest years on record with 2024 tying 2007 for 4th warmest, and seven of the top ten warmest years have occurred since 2005.
- Provisional rainfall data suggests 2025 was the 15th wettest year since 1941 with 104% of the 1991-2020 LTA, with an observed average of 1,338.7 mm.

The IPCC's Sixth Assessment Report does not, however, conclude that a climate catastrophe is inevitable, but rather, there remains a 'narrow path' to determine the future course of climate, mainly by cutting emissions down to net zero.

If permitted, the Proposed Project would form one of the largest wind farms in Ireland and would represent a significant contribution to the decarbonisation of the energy sector. The Proposed Project would deliver a substantial volume of renewable energy to the national grid, reduce the reliance on fossil fuels and support the achievement of national carbon budgets and climate targets. Accordingly, the Proposed Project would be fully aligned with the national and international climate policy objectives outlined in the following sections and plays an important role in accelerating the transition to a low-carbon energy system.

2.2.1 International Climate Change Policy

United Nations Framework Convention on Climate Change

In 1992, countries joined an international treaty, the United Nations Framework Convention on Climate Change (UNFCCC), as a framework for international efforts to combat the challenge posed by climate

[8] *The European State of the Climate Report 2025 (World Meteorological Organization and European Union, April 2026)* https://wmo.int/resources/publication-series/state-of-climate-europe/european-state-of-climate-2025
[9] *Annual Climate Statement for 2025 (MET Eireann, January 2026) https://www.met.ie/annual-climate-statement-for-2025*

change. The UNFCCC seeks to limit average global temperature increases and the resulting climate change. In addition, the UNFCCC seeks to cope with impacts that are already inevitable. It recognises that the climate system is a shared resource whose stability can be affected by industrial and other emissions of carbon dioxide and other greenhouse gases. The framework set no binding limits on greenhouse gas emissions for individual countries and contains no enforcement mechanisms. Instead, the UNFCCC outlines how specific international treaties (called "protocols" or "Agreements") may be negotiated to set binding limits on GHG.

Kyoto Protocol

The Kyoto Protocol operationalises the UNFCCC by committing industrialised countries and economies in transition to limit and reduce GHG emissions in accordance with agreed individual targets. Ireland is a Party to the Kyoto Protocol, which came into effect in 2005, and as a result of which, emission reduction targets agreed by developed countries are now binding.

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

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

Under the Protocol, countries must meet their targets primarily through national measures, although market-based mechanisms (such as international emissions trading) can also be utilised. An annual Conference of Parties (COP) has been established building upon the Protocol, with the Paris Agreement (COP21) shifting the focus to all countries not just developed nations.

COP21 Paris Agreement

COP21 was the 21st session of the Conference of the Parties (COP) to the UNFCCC. Every year since 1995 (excluding 2020 due to COVID-19), the COP has gathered the 196 Parties (195 countries and the European Union) that have ratified the Convention in a different country, to evaluate its implementation and negotiate new commitments. COP21 was organised by the United Nations in Paris and held from 30th November to 12th December 2015. COP21 closed with the adoption of the first international climate agreement (concluded by 195 countries and applicable to all). The 12-page text, made up of a preamble and 29 articles, provides for a limitation of the global average temperature rise to well below 2°C above pre-industrial levels and to limit the increase to 1.5°C. It is flexible and takes into account the needs and capacities of each country. The IPCC's Sixth Assessment Report (2021) further collaborates this need to limit any increase in global average temperature to 1.5°C, stating that (underlined for emphasis),

> *"Humanity has emitted 2,560 billion equivalent tons of CO_2 since 1750, and we only have a budget of 500 more if we want to limit warming to 1.5°C.*
>
> *By following a trajectory of very low GHG emissions (SSP1-1.9), the threshold of 1.5°C will be reached in the short term, between 2021 and 2040, before being very slightly exceeded (1.6°C anticipated over the period 2041-2060) then respected in the long term (1.4°C anticipated over the period 2081-2100).*

Everything is not lost, but we must pursue the Paris Agreement's most ambitious goal of limiting warming to 1.5°C."

An article published by the IPCC on 6th October 2018 titled '*Global Warming of 1.5°C',* notes the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways; in the context of mitigation pathways, strengthening of the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty. This special report is part of an invitation contained in the Decision of the 21st Conference of Parties of the United Nations Framework Convention on Climate Change to adopt the Paris Agreement and provides an update on the impact of climate change if emissions are not reduced.

COP25 Madrid

COP25, the 25th session of the COP, was held between the 2nd and 13th of December 2019 in Madrid. The conference was characterised by repeated warnings from civil society (National Government Organisations and corporates) on emerging evidence and scientific consensus on climate change risk. Specifically, it was noted that there are only *'10 years left' before the opportunity of limiting global warming to 1.5°C is no longer feasible'*. As such, the only remaining approach to limiting rising global temperatures is a *'7.6% reduction of global GHG emissions every year between 2020 and 2030, and to reach net zero emissions by 2050'*.

However, consensus was not achieved between States on finalising the operating rules of the Paris Agreement and to ensure that it became operational by 2020. Three issues which emerged between States from COP25 are summarised below:

- There was no consensus between States to raise countries' climate ambitions, e.g. to make increased commitments in light of growing climate change data. Some States were opposed to imposing any obligation on countries to submit enhanced pledges next year, arguing it should be each country's own decision. All states were required to submit a review of their commitments for COP26 in 2020. At the current level of climate targets, within a decade, the objective of the Paris Agreement will no longer be achievable;
- There was no agreement on finalising Article 6, the foundations for international cooperation to combat climate change. The aim was to establish the rules for new international mechanisms for financing and transferring GHG emission reductions; and
- There was no agreement on financing (Green Climate Fund); specifically, relating to both loss and damage caused by climate change.

Despite the lack of consensus on the above challenges, COP25 did achieve more limited success with regard to the introduction of the "*San Jose Principles for High Ambition and Integrity of International Carbon Markets*", which sets out the framework on which a robust carbon market should be built. These principles include, but are not limited to:

- Ensures environmental integrity and enables the highest possible mitigation ambition;
- Delivers an overall mitigation in global emissions, moving beyond zero-sum offsetting approaches to help accelerate the reduction of global GHG emissions;
- Prohibits the use of pre-2020 units, Kyoto units and allowances, and any underlying reductions toward Paris Agreement and other international goals; and,
- Ensures that double counting is avoided and that all use of markets toward international climate goals is subject to corresponding adjustments.

These principles received backing from 23 EU nations, including Ireland, as well as countries in Latin America, 5 Pacific islands, and 2 Caribbean nations.

COP26 Glasgow

COP26 took place in Glasgow, Scotland between the 31st of October and 12th November 2021. The summit was centred around the fact that *"climate change is the greatest risk facing us all".*

The key items COP26 seeks to achieve are:

- Secure global net zero by mid-century and keep 1.5 degrees within reach;
- Adapt to protect communities and natural habitats;
- Mobilise finance; and
- Work together to deliver.

All world leaders at the summit confirmed the need to urgently address the gaps in ambition and work together to achieve climate action. The summit highlighted that the Paris Agreement is working, with leaders outlining national targets and efforts to further reduce emissions. There was a clear commitment to working together to achieve climate aims, with significant announcements including:

- Over 40 leaders joined the Breakthrough Agenda, a 10-year plan to work together to create green jobs and growth globally, making clean technologies and solutions the most affordable, accessible and attractive option before 2030 – beginning with power, road transport, steel, hydrogen and agriculture.
- Over 120 countries covering more than 90% of the world's forests endorsed the Glasgow Leaders' Declaration on Forests & Land Use committing to work collectively to halt and reverse forest loss and land degradation by 2030, backed by the biggest ever commitment of public funds for forest conservation and a global roadmap to make 75% of forest commodity supply chains sustainable.
- A Just Energy Transition Partnership was announced to support South Africa's decarbonisation efforts; a powerful example of collaboration between an emerging economy and international partners.
- The launch of the Global Methane Pledge saw over 100 countries committing collectively to reduce global methane emissions by 30% by 2030.

COP27 Sharm el-Sheikh

COP27 took place in Sharm el-Sheikh, Egypt, from the 6th to the 20th of November 2022. COP27 centred around three major topics:

- Closing the emissions gap to keep the 1.5°C goal alive
- Loss and Damage
- Climate Finance

COP27 officially ended on the 18th of November, but due to the nature of negotiations an outcome text and the final press conference was not held until November 20th. The first outcomes of the negotiations of the COP27 agenda were seen in the first draft document. After further discussion, a consolidated final document was produced and, while it removed much of the vague wording of the first draft, it also removed some critical key points, particularly in relation to the strengthening of actions required by developed nations. The most significant outcomes from COP27 are outlined below:

- **Phase down/out language:** The final agreement was delayed due to the stance of China and India, among others, who were not comfortable with the 'phase out' of coal wording in the draft text. This led to the watering down of this commitment to a 'phase down' of coal use. The hope was that COP27 would work to include further language on coal and fossil fuel reduction efforts. However, the wider commitment to phase out all fossil fuels, led by India, and backed by the US and the EU, was taken out and can be marked as the biggest disappointment of COP27.

- **1.5°C Pathway:** The 1.5°C warming limit has been retained. It gives key political signals that the phase down of all fossil fuels is happening.
- **Climate Finance & Loss and Damage:** An initiative known as the Global Shield Against Climate Risk (GSACR) was launched by the V20 and G7. The intention of this initiative has been framed as an insurance policy backed by the World Bank to prepare and protect those most vulnerable to climate change disasters.

COP28 Dubai

COP28 took place in Dubai, United Arab Emirates and was held from the 30th of November until the 13th of December 2023. COP28 recognised the urgent need to reduce GHG emissions and emphasised the importance of mitigating climate change. The agreement reached at the COP provided a significant boost to renewable energy industries and set the stage for countries to prioritise clean and sustainable energy generation. By committing to this transition, the international community took a crucial step towards addressing climate change and creating a more sustainable future. Key actions arising from COP28 include:

- Adoption of enhanced climate commitments and targets by participating countries, aimed at limiting global temperature rise to 1.5 degrees Celsius above pre-industrial levels.
- Development of mechanisms and strategies for implementing these commitments, including the mobilisation of financial resources to support developing nations in their climate mitigation and adaptation efforts.
- Advancing the implementation of the Paris Agreement, with a focus on transparency, accountability, and reporting of progress.
- Accelerating the global transition to clean, renewable energy sources and phasing out fossil fuel subsidies.
- Promoting nature-based solutions and conservation efforts to mitigate climate change and preserve biodiversity.
- Addressing the impacts of climate change, such as adaptation measures for vulnerable communities and sectors.
- Collaborating on international climate finance mechanisms, carbon pricing, and technology transfer to support climate action globally.
- Strengthening international partnerships and cooperation to foster shared responsibility and collective action in addressing climate change.

The final COP28 text includes a pledge whereby signatory countries commit to work together to triple the world's installed renewable energy generation capacity to at least 11,000GW by 2030, taking into consideration different starting points and national circumstances.

COP29 Baku

COP29 took place in Baku, Azerbaijan between the 11th and 22nd of November 2024. There was a central focus on climate financing with agreements being reached on tripling finance to developing countries to help them protect their people and economies from climate-related disasters and sharing the benefits of the boom in renewable energy. Key actions arising from COP29 include:

- Launch of the COP29 Global Energy Storage and Grids Pledge which commits signatories to a collective goal of deploying 1,500GW of energy storage globally by 2030.
- COP29 Green Energy Pledge: Green Energy Zones and Corridors which promotes the connection of green energy zones and corridors to communities in need through the development of intraregional and interregional interconnected electricity grids.

- Call to action for an equitable and renewable energy transition and increased renewable energy capacity globally.

At COP29, significant progress was made in the discussions surrounding carbon markets, with nearly 200 nations agreeing on critical rules under Article 6 of the Paris Agreement. These rules aim to establish an UN-backed international carbon market. The adoption of these rules is seen as a crucial step towards operationalising a robust and credible carbon market. Despite the advances, concerns were expressed about the potential for weak governance and risks of exploitation in the system; these issues must be addressed to ensure the market's full functionality.

COP30 Belém

COP30 took place in Belém, Brazil between the 10th and 21st of November 2025, marking the first UN climate summit hosted within the Amazon region. It was framed as the "Implementation COP", progressing the post-Paris Agreement framework from pledges to delivery after the first Global Stocktake (GST-1). Key actions arising from COP30 include:

- Launch of the 'Global Implementation Accelerator', a voluntary initiative designed to support rapid, high-impact interventions. It creates a structured space for countries to receive technical support, identify barriers, and coordinate investment strategies. Its remit covers a wide spectrum of mitigation and adaptation priority areas, including renewable energy deployment, battery storage, methane reduction, digital grid management, and crucial nature-based interventions.
- Through the Belém Package, Parties committed to accelerating *"zero- and low-emission technologies"* in hard-to-abate sectors such as industry, transport and power.
- COP 30's redefined Action Agenda included 117 'Plans to Accelerate Solutions' (PAS) across sectors, many of which target low-carbon energy, industrial decarbonization, and clean system deployment.
- COP30 set a long-term ambition to mobilise USD 1.3 trillion annually by 2035 for climate action. This finance is intended to help scale clean energy infrastructure (such as renewables, storage and grid infrastructure), support adaptation, and enable just transitions.

COP30 made strong progress on tools, mechanisms and political momentum for scaling renewable energy, improving efficiency and enabling just transitions. However, the inability to deliver a clear, binding fossil fuel phase-out remains a major barrier to aligning global energy systems with the 1.5°C pathway.

European Green Deal – European Climate Law (2021)

The European Green Deal, initially introduced by the European Commission in December 2019, sets out the 'blueprint' for a transformational change of the 27-country bloc from a high- to a low-carbon economy, without reducing prosperity and while improving people's quality of life, through cleaner air and water, better health and a thriving natural world.

The European Green Deal is intended to work through a framework of regulation and legislation setting clear overarching targets, e.g. a bloc-wide goal of net-zero carbon emissions by 2050 and a 55% cut in emissions by 2030 (compared with 1990 levels). This is a substantial increase compared to the previous target of at least 40% (2030 Climate & Energy Framework), and furthermore, these targets demonstrate the ambition necessary to keep the global temperature increase to well below 2°C and pursue efforts to keep it to 1.5°C as per the Paris Agreement. With regard to the energy sector, the European Green Deal focuses on 3 no. key principles for the clean energy transition, which will help reduce GHG emissions and enhance the quality of life for citizens:

1. *Ensuring a secure and affordable EU energy supply;*

2. *Developing a fully integrated, interconnected and digitalised EU energy market; and*
3. *Prioritising energy efficiency, improving the energy performance of our buildings and developing a power sector based largely on renewable sources (e.g. the Proposed Project).*

The European Climate Law[10] writes into law the objectives set out above in the European Green Deal for Europe's economy and society to become climate-neutral by 2050. Climate neutrality by 2050 means achieving net-zero GHG emissions for EU countries as a whole, mainly by cutting emissions, investing in green technologies and protecting the natural environment. The European Climate Law includes:

- A legal objective for the EU to reach climate neutrality by 2050;
- An ambitious 2030 climate target of at least 55% reduction of net emissions of GHGs as compared to 1990, with clarity on the contribution of emission reductions and removals;
- A process for setting a 2040 climate target, taking into account an indicative GHG budget for 2030-2050 to be published by the Commission;
- A commitment to negative emissions after 2050;
- The establishment of European Scientific Advisory Board on Climate Change, that will provide independent scientific advice;
- Stronger provisions on adaptation to climate change; and
- Strong coherence across EU policies with the climate neutrality objective.

The law aims to ensure that all EU policies contribute to this goal and that all sectors of the economy and society play their part. All 27 no. EU Member States have committed to turning the EU into the first climate-neutral continent by 2050. One third of the 1.8 trillion-euro investments from the Next Generation EU Recovery Plan and the EU's seven-year budget, will finance the European Green Deal. On 14th July 2021, the European Commission adopted a set of proposals[11] to make the EU's climate, energy, transport and taxation policies fit for reducing net GHG emissions by at least 55% by 2030, compared to 1990 levels.

Achieving the emission reductions in the next decade which is crucial to Europe becoming the world's first climate-neutral continent by 2050 would be assisted by the Proposed Project.

2.2.1.2 Project Compliance with International Climate Policy

Based on a review of key international climate policy documents, it is clear that the Proposed Project will play a significant role in reducing reliance on fossil fuels for electricity generation. This move supports the objectives of the UNFCCC to limit global temperature increases driven by climate change, as well as the goals set out in the Kyoto Protocol and various COP agreements outlined above. By making a just transition to more renewable forms of electricity generation, the level of carbon emissions will drop as our reliance on non-renewable forms of energy lessen.

The Proposed Project is also considered to be in line with the European Green Deal and European Climate Law, which also aim to reduce carbon emissions and achieve net-zero carbon emissions by 2050. These goals are not likely to be met if projects, such as Proposed Project, are not implemented. The construction of this renewable energy development would also aid in ensuring energy security within the EU which is a target of the European Green Deal. As wind is an indigenous and abundant resource, countries can tap into their own wind potential, reducing vulnerability to price fluctuations and geopolitical risks associated with fossil fuel imports.

[10] *European Climate Law was published in the Official Journal on 9th July 2021 and came into force on 29th July 2021.*
[11] *'Fit for 55': delivering the EU's 2030 Climate Target on the way to climate neutrality (July 2021)* https://www.consilium.europa.eu/en/policies/eu-plan-for-a-green-transition/

2.2.2 National Climate Change Policy

Programme for Government – Securing's Ireland's Future (January 2025)

The Programme for Government 2025 – Securing Ireland's Future (January 2025) places specific emphasis on climate change, recognising that time is critical in addressing the climate crisis. The Programme states that the Government is committed to taking *"decisive action to radically reduce our reliance on fossil fuels and to achieve a 51% reduction in emissions from 2018 to 2030, and to achieving net-zero emissions no later than 2050"*.

The Programme states that the next ten years are a critical period in addressing the climate crisis, and therefore, a deliberate and swift approach to reducing more than half of Ireland's carbon emissions over the course of the decade (2020-2030) must be implemented. The programme states that the Government are committed to reducing GHG emissions by an average 7% per annum over the next decade in a push to achieve net-zero emissions by the year 2050.

With regard to renewable energy generation, the Programme notes that the Government is committed to the rapid decarbonisation of the energy sector. The Programme states the Government is *"is committed to achieving 80% of Ireland's electricity generation from renewable sources by 2030"* through the acceleration of the renewable energy deployment.

Climate Action and Low Carbon Development Act 2015 (as amended)

The Climate Action and Low Carbon Development Act 2015 (as amended) ('the Climate Act') legally binds Ireland to achieve net-zero emissions no later than 2050, and to a 51% reduction in emissions by the end of this decade.

The Climate Act provides the framework for Ireland to meet its international and EU climate commitments and to become a leader in addressing climate change. As indicated by the premise of the legislation, the reduction of emissions is a key proponent of the Climate Act and incorporates the following key provisions:

- Embeds the process of setting binding and ambitious emissions-reductions targets in law;
- Provides for a national climate objective, which commits to pursue and achieve no later than 2050, the transition to a climate-resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy;
- Provides that the first of two, five-year carbon budgets proposed by the CCAC should equate to a total reduction of 51% over the period to 2030, relative to a baseline of 2018;
- The role of the CCAC has been strengthened;
- The government must adopt carbon budgets that are consistent with the Paris Agreement and other international obligations;
- Actions for each sector will be detailed in the Climate Action Plan which must be updated annually; and
- Local Authorities must prepare individual Climate Action Plans which will include both mitigation and adaptation measures and will be updated every five years.

Section 15(1) below places an obligation on public bodies to exercise their functions in favour of climate concerns when making decisions, unless it is objectively impracticable to do so.

"A relevant body shall, in so far as practicable, perform its functions in a manner consistent with:

a) the most recent approved climate action plan,
b) the most recent approved national long term climate action strategy,
c) the most recent approved national adaptation framework and approved sectoral adaptation plans,

d) the furtherance of the national climate objective, and
e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State."

The implications for public bodies in exercising their functions in accordance with Section 15 of the Climate Act has been scrutinised by the Irish legal system. The Supreme Court judgment on 4th February 2026 (Coolglass Wind Farm Limited v An Coimisiún Pleanála [2026] IESC 5) confirmed that consenting authorities must make decisions in a manner 'consistent with' the approved national long term climate action strategy, 'in so far as is practicable'. This means that departure from climate objectives is permissible but only where there are genuine practical difficulties that make full alignment impracticable.

Consenting Authorities, in making a decision on this application, must meaningfully engage with national climate objectives when exercising their decision-making functions. Consenting Authorities must also ensure that their decision on an application falls within a spectrum of outcomes which can be considered to be consistent with, in so far as practicable, national climate objectives.

Carbon Budgets

To achieve the 51% emissions reduction target, the Climate Act, requires the CCAC to recommend a proposed programme of economy-wide 5-year Carbon Budgets to the Minister for the Environment, Climate and Communications. The first national carbon budget programme proposed by the Climate Change Advisory Council, approved by Government and adopted by both Houses of the Oireachtas in April 2022 comprises three successive 5-year carbon budgets from 2021 to 2035: Carbon Budget 1 (2021–2025) of 295 Mt CO_2eq, Carbon Budget 2 (2026–2030) of 200 Mt CO_2eq and a provisional Carbon Budget 3 (2031–2035) of 151 Mt CO_2eq[12].

In December 2024, the CCAC published its *Carbon Budget Proposal Report 2024*, proposing a finalised Carbon Budget 3 (2031–2035) of 160 Mt CO_2eq and a provisional Carbon Budget 4 (2036–2040) of 120 Mt CO_2eq. The CCAC calculates that consistency with the existing and proposed budgets requires emissions reductions equivalent to an average annual reduction of 6.3% over the period 2024–2040, delivering reductions of 56% by 2035 and 68% by 2040 relative to 2018.

At the time of writing, the proposed finalised Carbon Budget 3 of 160 Mt CO_2eq and provisional Carbon Budget 4 of 120 Mt CO_2eq have been considered by the Joint Committee on Climate, Environment and Energy but have not completed the statutory Oireachtas approval process.

The total emissions allowed under each budget are shown in Table 2-1 below.

[12] *Carbon Budget Technical Report (Climate Change Advisory Council, October 2021)* https://www.climatecouncil.ie/media/climatechangeadvisorycouncil/Technical%20report%20on%20carbon%20budgets%2025.10.2021.pdf

Table 2-1: Carbon Budgets of the Climate Change Advisory Council

	2021 – 2025 Carbon Budget 1	2026 – 2030 Carbon Budget 2	2031 – 2035 Provisional Carbon Budget 3	Provisional Carbon Budget 4 (2036–2040)
	All Gases			
Carbon Budget (Mt CO2eq)	295	200	160	120
Annual Average Percentage Change in Emissions	-4.8%	-8.3%	-3.5%	-
The first two carbon budgets are consistent with the statutory target of reducing greenhouse gas emissions by 51% by 2030 relative to 2018. The CCAC's proposed finalised Carbon Budget 3 and provisional Carbon Budget 4 are consistent with emissions reductions of 56% by 2035 and 68% by 2040 respectively, relative to 2018.				

Section 6C of the Climate Act provides that the Minister shall prepare, within the limits of the carbon budget, the Sectoral Emissions Ceilings. These ceilings set out the maximum amount of greenhouse gas emissions that are permitted in each sector. The Government approved Sectoral Emissions Ceilings on 28th July 2022. The electricity sector was allocated a sectoral ceiling of 40 Mt CO_2 eq for the first budget (2021-2025) and has sectoral ceiling of 20 Mt CO_2 eq for the second budget period (2026-2030).

The EPA's *Ireland's Provisional Greenhouse Gas Emissions 1990–2025*[13], published in July 2026 indicates that the first carbon budget was provisionally met. Cumulative emissions for the period 2021–2025 were 293.9 Mt CO_2eq, approximately 1.1 Mt CO_2eq below the 295 Mt CO_2eq carbon budget. Emissions from the electricity sector fell by 7.1% in 2025 to 6.59 Mt CO_2eq, with the EPA reporting that the Energy Industries sector met its Sectoral Emissions Ceiling for the first budget period.

The EPA reported in May 2026[14] that the second carbon budget (2026-2030) – which aims to support the achievement of the 51% emissions reduction target - would not be met. Current projections indicate that Ireland will only achieve a 13% reduction on 2018 levels by 2030 under the 'With Existing Measures (WEM)' scenario and a 25% reduction under the 'With Additional Measures (WAM)' scenario.

Section 6D, paragraph 5, of the Climate Act states that non-achievement of a carbon budget would see the excess emissions carried forward into the second budget period and that second carbon budget would be reduced by that amount. As the first carbon budget has been provisionally met, with the WEM scenario exceeding the budget by 0.4 Mt CO2eq, while the WAM scenario projects emission will be 1.8 Mt CO2eq under budget, no exceedance is currently expected to be carried forward into the second budget period. Notwithstanding this, the EPA projects that the second carbon budget will be exceeded by approximately 81 Mt CO_2eq under the WEM scenario and 53 Mt CO_2eq under the WAM scenario[15]. Accordingly, substantially greater emissions reductions will be required during the second carbon budget period to remain within the 200 Mt CO_2eq budget and progress towards achievement of the 51% emissions reduction target.

[13] *Ireland's Provisional Greenhouse Gas Emissions 1990–2025 (EPA, July 2026).* https://www.epa.ie/publications/monitoring-assessment/climate-change/air-emissions/EPA-Provisional-GHG-Emissions-1990-2025-web.pdf
[14] *Ireland's Greenhouse Gas Emissions Projections 2025–2030 (EPA, May 2026).* https://www.epa.ie/publications/monitoring-assessment/climate-change/air-emissions/EPA-GHG-Projections-2025-2030-Web.pdf
[15] *Ireland's Greenhouse Gas Emissions Projections 2025–2030 (EPA, May 2026)* https://www.epa.ie/publications/monitoring-assessment/climate-change/air-emissions/EPA-GHG-Projections-2025-2030-Web.pdf

The Proposed Project is of critical importance as it contributes significant additional renewable energy capacity. Decarbonising the electricity sector is crucial to not just the electricity sectors carbon reductions but other sectors too, such as transport and heating, which rely on carbon emission reductions by electrification.

Report of the Joint Committee on Climate Action - Climate Change: A Cross-Party Consensus for Action (2019)

In March 2019, the Joint Committee on Climate Action Change released a report detailing a cross-party consensus for action. In 2019 there was already concern that Ireland's performance in meeting international and national obligations was poor, and concern remained regarding emission projections the ability to meeting 2030 targets under relevant EU Directives.

The report states that the transformation of Ireland's energy system will be required for the country to meet its future 2030 and 2050 GHG emission targets; specifically, in order to reach net-zero emissions by 2050, Ireland will be required to fully decarbonise electricity generation. Therefore, there is a clear incentive for developing, and safeguarding, Ireland's renewable energy capacity.

Given the concern that Ireland's future emissions targets may be missed, it is crucial that projects, such as the Proposed Project, which can contribute in a meaningful manner towards climate change targets, and which can be provided without significant adverse environmental effects arising, are brought forward and supported with favourable consideration through the planning system and ultimately constructed.

Climate Action Plan 2023

The Climate Action Plan 2023 ('CAP23') was published in December 2022 by the Department of the Environment, Climate and Communications (DECC). This outlines the actions required up to 2035 and beyond to meet Ireland's commitment to becoming carbon neutral by 2050. CAP23 sets out a roadmap to deliver on Ireland's climate ambition and is aligned to ensure that Ireland achieves its legally binding target (the Climate Act) of net-zero GHG emissions no later than 2050.

A target aims for a reduction in emissions of 51% over the period 2018 to 2030 and in doing so, prevent/ mitigate the potentially devastating consequences of climate change on Ireland's environment, society, economy and natural resources. CAP23 states that to do so, Ireland must harness the untapped indigenous renewable resources and has a target of achieving 80% of energy being produced from renewable sources by 2030 (unchanged from the previous Climate Action Plan, 2022) with a target of 9GW of that being produced by onshore wind. Measures set out in CAP23 to achieve these targets include to *'accelerate and increase the deployment of renewable energy to replace fossil fuels'* (Section 12.1.4 of CAP23). It is clear from the message and ambition of CAP23 that the drive to deploy renewable energy projects such as the Proposed Project in Ireland are critical to achieving the aims and objectives of CAP23 including the 9GW of onshore wind energy by 2030 and carbon neutrality by 2050.

> *"Achieving these ambitions will require a coordinated effort across Ireland and every economic sector will be involved. It requires no less than a national transformation over the coming years in how we work, travel, heat out homes, source our energy and use our land"*

Decarbonisation of the electricity sector is, as noted in CAP23, key to the decarbonisation of other sectors who will depend on electrification including transport, heating and industry. The increase in the portion of renewable electricity of 80% by 2030 will come in part from a targeted 9GW of onshore wind. CAP23 notes:

"Achieving further emissions reductions between now and 2030 requires a major step up in how we accelerate and increase the deployment of renewable energy to replace fossil fuels, deliver a flexible system to support renewables, and manage electricity demand".

Chapter 12 of CAP23 sets out the state of play, targets and actions for the decarbonisation of the electricity sector. Carbon emissions from electricity have fallen by 45% between 2005 and 2020, falling by 19% between 2005-2012 and by 33% between 2012 and 2020. This trend is largely due to the availability of renewable energy generated electricity (a sixfold increase between 2005 and 2020) and an associated reduction in the use of carbon heavy fuels such as peat and coal.

Due to the scale of the challenge, and the recognition of central role of the electricity sector in achieving sector wide targets, the electricity sector has been allocated the smallest carbon budget and will require the steepest carbon emissions decline of all sectors – namely a reduction in carbon emission by -75% relative to 2018 baseline. The measures set out for electricity sector include inter alia:

- Reduce annual CO_2eq. emissions from the sector to 3 MtCO_2eq by 2031 (75% reduction compared to 2018);
- Accelerate and increase the deployment of renewable energy to replace fossil fuels;
- Accelerate the delivery of onshore wind, offshore wind and solar through a competitive framework to reach 80% of electricity demand from renewable energy by 2030;
- Target 6GW of onshore wind and to 5 GW of solar by 2025;
- Target 9 GW onshore wind, 8 GW Solar and at least 5 GW of offshore wind by 2030;
- Align the relevant constituent elements of the planning and permitting system to support accelerated renewable energy development, supported by national policy and associated methodologies to inform regional and local planning policies, noting that Development Plans are obliged to set out objectives to facilitate energy infrastructure.

Having regard to the targets and measures set out above, it is evident that there is strong policy support for the provision of additional renewable energy generators, such as the Proposed Project.

Climate Action Plan 2024

The Climate Action Plan 2024 ('CAP24') builds on CAP23 by refining and updating the status of the actions required to deliver the decarbonisation required under the carbon budgets and sectoral emissions ceilings. The renewable electricity generation targets are unchanged from the CAP23 (9GW of onshore wind and 80% renewable electricity share).

CAP24 includes the latest trends in the electricity sector:

- In 2022, renewable generation accounted for 38.6% of electricity, an increase from 35% in 2021.
- Electricity accounted for 14.4% of Ireland's GHG emissions in 2022.
- To meet the first carbon budget the electricity sector requires a decarbonisation rate of 17.3% per annum in the period 2023-2025. For context, the decarbonisation rate between 2018 and 2022 was 1.4% per annum.

CAP24 acknowledges the urgency and importance of the decarbonising of the electricity sector. The plan states:

"Given that the programme of large-scale offshore wind deployment is expected to be realised towards end decade, deployment rates for onshore renewables will need to increase to match demand growth to ensure we keep electricity emissions within range of the carbon budgets. This requires a major upscaling and accelerating in current deployment of renewables, particularly onshore wind."

The scale of the challenge is apparent when quantified:

> *"As an example, the historical average deployment of onshore wind installed capacity connected between 2008 and 2020 inclusive was 280 MW per annum from 19 projects (with an annual maximum of 612 MW). 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****." (emphasis added)*

CAP24 identifies the alignment of local and national policy as critical to accelerate renewable energy rollout:

> *"greater alignment between local plans and renewable energy targets at national and regional level to support investment in and delivery of onshore wind and solar renewable energy is also critical."*

Having regard to the targets and measures set out above, it is clear that there is strong policy support for the provision of additional renewable energy generators, such as the Proposed Project.

Climate Action Plan 2025

The Climate Action Plan 2025 ('CAP25') represents the third statutory update to Ireland's climate roadmap under the Climate Act. Building on the foundations laid by previous plans, CAP25 refines and strengthens the strategies necessary to deliver Ireland's legally binding carbon budgets and sectoral emissions ceilings. It sets out a clear trajectory to reduce greenhouse gas emissions by 51% by 2030 and to achieve climate neutrality no later than 2050.

A cornerstone of CAP25 is the decarbonisation of Ireland's electricity system through a substantial increase in renewable energy generation. The plan reaffirms ambitious targets for renewable electricity share which includes 80% by 2030, and 50% by 2025. This is to be achieved through the accelerated deployment of onshore wind (6 GW by 2025; 9 GW by 2030), offshore wind (8 GW by 2030), and solar energy (up to 5 GW by 2025; 8 GW by 2030).

CAP25 recognizes that *"A renewables-led system is at the core of Ireland's plan to radically reduce emissions in the electricity sector, protect our energy security, and ensure our economic competitiveness. This requires the accelerated and increased deployment of new renewable electricity generation capacity and related infrastructure."*

CAP25 also lays emphasis on the importance of aligning local and national policies to accelerate the rollout of renewable energy:

> *"The Planning and Development Act, 2024, the Renewable Energy Directive and the revised NPF together will ensure greater alignment between national, regional, and local authority levels to deliver on the renewable electricity ambition.*
>
> *The draft first revision of the NPF includes policy support for the development and upgrading of electricity grid infrastructure, the delivery of renewable electricity generation capacity, and the introduction of regional renewable electricity capacity allocations for each of the three Regional Assemblies by 2030"*

CAP25 sets out a clear roadmap to achieve Ireland's climate ambitions, including specific 2030 targets and decarbonization objectives. This roadmap provides strong policy support for the provision of additional renewable energy generators, such as the Proposed Project, to reach these targets.

2.2.2.2 Project Compliance with National Climate Policy

The Proposed Project aligns with the national climate policy objectives. The Proposed Project will make a significant contribution to achieving the CAP25 target of 9GW of onshore wind energy by the year 2030. Furthermore, the Proposed Project will aid Ireland in adhering to, or limiting the exceedance of, the country's carbon budgets. Currently, the electricity sector is rapidly approaching the designated sectoral ceiling of 20 $MtCO_2eq$ for the second carbon budget period from 2026 to 2030. The national renewable energy targets and the carbon budgets are integral to the government's response to the climate crisis.

2.3 Renewable Energy Policy and Targets

This section of the EIAR provides a breakdown of international and national renewable energy policy with regard to the Proposed Project. Under this section, the following are discussed:

- EU Renewable Energy Policy
- National Renewable Energy Policy

National policy has developed in line with European and international policies, targets and commitments, in that the importance and urgency of decarbonising the energy generation sector, the economy in general and reducing GHG emissions has become increasingly more apparent.

The Proposed Project complies with the nationally stated need to provide a greater amount of renewable energy onto the national grid and will further reduce the national reliance on fossil fuels for electricity generation.

2.3.1 European Renewable Energy Policy

Renewable Energy Directive

The Renewable Energy Directive ('RED') is the EU legal framework for the development of renewable energy across all sectors of the EU economy, supporting clean energy cooperation across EU countries. Since the introduction of the RED in 2009, it has undergone several revisions, the most recent of which occurred in November 2023. Since its adoption in 2009, the share of renewable energy sources in energy consumption has increased from 12.5% in 2010 to 26.2% in 2025[16]. Of the 27 EU member states the lowest proportions of renewables were recorded in Ireland (17.2%). Crucially, the RED sets the overall target for renewable energy in the EU.

RED I – 2009

Renewable Energy Directive 2009 (RED I - the original RED) (2009/28/EC), adopted in 2009, set binding targets for EU member states to achieve a 20% share of renewable energy in final energy consumption by 2020. It established a framework for national renewable energy action plans, sustainability criteria for biofuels and bioliquids, and a system of guarantees of origin for renewable energy.

RED II – 2018

[16] *Renewable Energy Statistics (Eurostat, July 2026)* https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Renewable_energy_statistics

RED II, the first major amendment to the RED, (2018/2001/EU)[17] entered into force in December 2018, as part of the Clean Energy for all Europeans package. In RED II, the overall EU target for Renewable Energy Sources consumption by 2030 was raised to 32%.

RED III – 2023

In November 2023, a revision of the Renewable Energy Directive (RED III), came into force. RED III (Directive (EU) 2023/2413)[18] increases the EU wide renewable energy target from 32% set under the previous revision of the directive to 42.5%, with an ambition to reach 45% by 2030. The increase was proposed under the publication of REPowerEU plan in May 2022. RED III also introduces specific targets for Member States in the industry, transport, and building (district heating and cooling) sectors.

Under Article 15c of RED III, EU member states must identify 'Renewables Acceleration Areas' of where projects will undergo a simplified and fast-track procedure. RED III defines the timeframes for the permit-granting procedure. In Renewables Acceleration Areas, the permit-granting procedure shall not exceed 12 months for renewable energy projects and outside renewables acceleration areas the permit granting procedure shall not exceed two years.

Central to RED III is the presumption that renewable energy development must be considered to be **in the overriding public interest** when addressing competing interests under the Habitats Directive (92/43/EEC), Birds Directive (2009/147/EEC) and the Water Framework Directive (2000/60/EC). The recognition of renewable energy projects being in the *'overriding public interest'* was originally introduced under Article 3(1) of emergency Regulation 2022/2577 of 22nd December 2022 named *'laying down a framework to accelerate the deployment of renewable energy'* in response to REPowerEU which found that the permitting process is the biggest bottleneck for deploying wind at scale, with approximately 80 GW of wind power capacity stuck in permitting procedures across Europe.

Article 16f of RED III states:

> *'By 21 February 2024, until climate neutrality is achieved, Member States shall ensure that, in the permit granting procedure, the planning, construction and operation of renewable energy plants, the connection of such plants to the grid, the related grid itself, and storage assets are presumed as being in the overriding public interest and serving public health and safety when balancing legal interests in individual cases for the purposes of Article 6(4) and Article 16(1), point (c), of Directive 92/43/EEC, Article 4(7) of Directive 2000/60/EC and Article 9(1), point (a), of Directive 2009/147/EC.'*

There is an 18-month period to transpose most of the directive's provisions into national law which ended on the 1st of July 2025, with a shorter deadline of July 2024 for some of the provisions related to permitting for renewables. In September 2024, the EU Commission opened infringement proceedings against Ireland for failures in relation to the transposition of permitting procedures. On the 17th of July 2025, the EU decided to send a 'reasoned opinion', a formal request to comply with EU law, giving Ireland two months to respond and take the necessary measures to complete the transposition. In August 2025, some of the provisions of RED III were transposed into national law through the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. No. 274 of 2025). This legislation was adopted for the purpose of giving effect to Articles 15e (5), 16, 16b, 16c (2), 16d, 16e and 16f of the RED III Directive.

The legislation introduces new decision timelines based on a "completeness check" (ss.34E, 37JB, 295B): 52 weeks for new wind farms, 30 weeks for repowering projects, and one to two years for IROPI

[17] *Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (recast)*
[18] *Directive (EU) 2023/2413 of the European Parliament and of the Council of 18 October 2023 amending Directive (EU) 2018/2001, Regulation (EU) 2018/1999 and Directive 98/70/EC as regards the promotion of energy from renewable sources, and repealing Council Directive (EU) 2015/652*

cases (two years for projects over 150 kW, one year for projects under 150 kW or repowering). Importantly, renewable energy developments, including related grid and storage infrastructure, are now presumed to be in the **overriding public interest**.

Energy Roadmap 2050

The Energy Roadmap 2050 was published by the European Commission in 2011 and analyses the transition of the contemporary energy system in ways that would be compatible with the GHG reductions targets as set out in the RED (Directive 2009/28/EC) while also increasing competitiveness and security of supply. To achieve these targets and objectives, the Roadmap states that significant investments will need to be made in new low-carbon technologies and renewable energy, e.g. wind energy infrastructure, energy efficiency and grid infrastructure. Five main routes are identified to achieving a more sustainable, competitive and secure energy system in 2050:

- High Energy Efficiency;
- Diversified Supply Technologies;
- High Renewable Energy Sources;
- Nuclear energy; and
- Carbon capture and storage.

The analysis found that decarbonising the energy system is technically and economically feasible. The Roadmap notes that all scenarios show the biggest share of energy supply technologies in 2050 comes from renewables.

As such, a major prerequisite for a more sustainable and secure energy system is a higher share of renewable energy up to and beyond 2030 to 2050. Each of the scenarios assumes in the analysis that increasing the share of renewable energy and using energy more efficiently are crucial, irrespective of the particular energy mix chosen.

The Proposed Project will aid in achieving the scenarios set out in the Energy Roadmap 2050, by increasing the share of renewable energy being produced onto the national grid thereby reducing the reliance on more unsustainable forms of electricity production.

European Green Deal

The European Green Deal, further detailed in Section 2.2.1 above, was launched in December 2019 and proposes to increase the binding target of renewable sources in the EU's energy mix from 32% to 40% by 2030 via amendments to the RED as per the 'Fit for 55' package (July 2021)[19]. The European Green Deal recognises that 75% of the EUs GHG emissions stems from the production and use of energy, hence emphasising the need to decarbonise the EU's energy system. The deal identifies three key principles to support a clean energy transition:

1. *Ensuring a secure and affordable EU energy supply.*
2. *Developing a fully integrated, interconnected, and digitalised EU energy market.*
3. *Prioritising energy efficiency, improving the energy performance of our buildings and developing a power sector based largely on renewable sources*[20]*.*

[19] *'Fit for 55': delivering the EU's 2030 Climate Target on the way to climate neutrality (July 2021)* https://www.consilium.europa.eu/en/policies/eu-plan-for-a-green-transition/
[20] *Energy and the Green Deal* https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/energy-and-green-deal_en

REPowerEU

REPowerEU, launched in May 2022 by the European Commission, proposes an outline of a plan to make Europe independent from Russian fossil fuels, starting with gas, due to the high and volatile energy prices, and security of supply concerns following Russia's unprecedented military attack on Ukraine. Prior to the Russian invasion of Ukraine, the EU imported 90% of its gas consumption, with Russia providing around 45% of those imports. Russia also accounted for around 25% of oil and 45% of coal imports. Phasing out dependence on fossil fuels can be done well before 2030, increasing the resilience of the EU-wide energy system based on two pillars:

1. *Diversifying gas supplies, via higher Liquefied Natural Gas (LNG) and pipeline imports of biomethane and renewable hydrogen production and imports from non-Russian suppliers.*
2. *Reducing faster the use of fossil fuels by boosting energy efficiency, increasing renewables and addressing infrastructure bottlenecks.*

In September 2023, the European Parliament agreed to update the RED. The updates including raising the share of renewables in the EU's final energy consumption to 42.5% by 2030 with Member States encouraged to achieve 45% and a more efficient approval procedure for deploying renewables in Europe. In addition, as a part of the REPowerEU Plan, the European Commission has proposed a series of additional targeted amendments to the renewable energy directive to reflect the ongoing changes in the energy landscape and the continued invasion of Ukraine. This will make the sector more efficient and reach the set goals faster.

In addition, the REPowerEU Plan highlights the overriding public interest in achieving renewable energy targets. The REPowerEU Plan states that: *"the revised proposal operationalises the principle of **renewable energy as an overriding public interest**, introduces the designation of **'go-to' areas** and other ways to shorten and simplify permitting while also minimising potential risks and negative impacts on the environment."* This highlights the importance of public interest and incentive to achieve the renewable energy target, highlighting the importance of appropriate designation of sufficient areas for wind energy development by local authorities within the EU.

AccelerateEU - Energy Union

In a communication dated 22nd April 2026, the European Commission addressed the vulnerability of Europe's dependency on fossil fuel imports as evident by the rising energy costs. The AccelerateEU plan is a comprehensive plan of actions and measures by the European Commission in response to the energy crisis triggered by the conflict in the Middle East and the closure of the Strait of Hormuz.

The plan consists of five key areas of action which aim to support member states in providing short-term relief to energy consumers most affected by the crisis. It also sets an accelerated path to achieving a more resilient energy system in the medium and long term:

- greater coordination between Member States and with international partners;
- supporting Member States to protect consumers, including industry, from price shocks, and simultaneously helping them in the energy transition;
- accelerating the shift to homegrown clean energy and electrification;
- stepping up our energy system; and
- boosting investment by mobilising both public and private funding for the energy transition.

The communication places a strong emphasis on the need to *"accelerate electrification, the roll out of additional domestic clean energy production and the energy transition".* The following is also stated in relation to renewable energy developments:

"By taking immediate action to generate strong results in the medium-term, Member States can replace significant volumes of oil and gas by accelerating the shift to clean, homegrown and abundant energy, including through electrification, deployment of solar thermal and geothermal energies as well as other renewable energy, nuclear, biomethane, sustainable biofuels and hydrogen.

For example, the capacity of renewable electricity deployed per year should increase to 100 GW/year, including through new large-scale renewable energy projects and accelerated solar deployment, which can deliver rapid results. To deliver at pace, it is therefore critical to streamline national permitting regimes in line with the requirements set in EU legislation. Beyond transposition efforts, frontloading implementation can deliver concrete results. By the end of 2026, the length of permitting procedures should decrease across Europe to maximum two years and each Member State should unlock the potential of renewable acceleration areas by establishing at least one."

Ultimately, the European Commission asserts the need to accelerate the transition to a renewable led energy sector in the interest of preserving the overall socio-economic and energy security in the EU.

2.3.1.2 Project Compliance with EU Policy

The Proposed Project is fully aligned with, and supported by, relevant EU energy and climate policy. It will contribute to the objectives of the 2030 Climate and Energy Framework, including the EU-wide binding targets of achieving at least 27% renewable energy and 27% energy efficiency by 2030. Additionally, the Proposed Project supports the increased ambition to raise the share of renewables in the EU's energy mix from 32% to a minimum of 42.5% by 2030.

The EU Energy Roadmap 2050, which outlines pathways to meet long-term climate and energy goals, highlights that all projected scenarios foresee renewables as the dominant source of energy supply by 2050. As such, the Proposed Project aligns with this long-term vision.

Regulation 2022/2577 introduced significant measures to facilitate the acceleration of the deployment of renewable energy, including an obligation on member states to prioritise the roll out of renewable energy projects when balancing competing legal interests. Furthermore, the REPowerEU plan, which aims to enhance energy security and accelerate the integration of renewables into the EU grid, explicitly calls for faster permitting processes for renewable projects and improvements to grid infrastructure. The Proposed Project directly supports these objectives and is therefore considered to be strongly underpinned by current EU energy policy.

The provisions of Regulation 2022/2577, the REPowerEU and the AccelerateEU Plans are applicable to the current planning application and EIAR, and they provide further justification for granting consent for the Proposed Project.

2.3.2 National Renewable Energy Policy

White Paper on 'Ireland's Transition to a Low Carbon Energy Future' 2015 – 2030

In May 2014, the Green Paper on Energy Policy in Ireland was launched which marked the start of a public consultation process on the future of Ireland's energy policy over the medium to long-term. The Department of Communications, Climate Action & Environment (now the Department of the Environment, Climate and Communications or DECC) acknowledged that energy is an integral part of Ireland's economic and social landscape and that *"a secure, sustainable and competitive energy sector is central to Ireland's ability to attract and retain Foreign Direct Investment and sustain Irish enterprise. The three key pillars of energy policy are to focus on security, sustainability and competitiveness".*

Following an extensive consultation process, the Government published the White Paper *'Ireland's Transition to a Low Carbon Energy Future 2015–2030'* in December 2015. This document, produced by the then Department of Communications, Energy and Natural Resources (DCENR), provides an updated energy policy framework to guide Ireland's transition to a low-carbon energy system through 2030 and towards 2050. It outlines the Energy Vision 2050, which targets an 80–95% reduction in energy sector GHG emissions (compared to 1990 levels), primarily through increased renewable electricity generation and greater use of electricity and bioenergy in heating and transport.

The policy framework was developed to guide policy and actions that the Irish Government intends to take in the energy sector up to 2030 and also reaching out to 2050 to ensure a low carbon future that maintains Ireland's competitiveness and ensures a supply of affordable energy. The Energy Vision 2050, as established in the White Paper, describes a *'radical transformation'* of Ireland's energy system which will result in GHG emissions from the energy sector reducing by between 80% and 95%, compared to 1990 levels. The paper advises that a range of policy measures will be employed to achieve this vision with emphasis on the generation of electricity from renewable sources, which there are plentiful indigenous supplies and increasing the use of electricity and bio energy to heat homes and fuel transport.

The White Paper highlights onshore wind as Ireland's leading and most cost-effective renewable resource, noting its high efficiency and lower support costs due to the country's strong wind profile. It also recognises the growing competitiveness of solar technology and its potential to enhance energy security, meet renewable targets, and stimulate economic growth.

> *"Onshore wind continues to be the main contributor (18.2% of total generation and 81% of RES-E in 2014). It is a proven technology and Ireland's abundant wind resource means that a wind generator in Ireland generates more electricity than similar installations in other countries. This results in a lower cost of support."*

National Energy Security Framework

More recently, the National Energy Security Framework (NESF) (DECC, April 2022)[21] highlights clearly the impacts the Russian invasion of Ukraine and the resulting war has had on Europe's energy system. The resulting decision by the European Union to phase out the import of Russian gas, oil and coal has brought to the fore the importance of security of supply and how energy policy is designed for long-term resilience. It takes account of the need to decarbonise society and economy, to reduce Ireland's emissions by 51% over the decade to 2030 and reach net-zero emissions by 2050. According to the SEAI's Energy in Ireland (2026) report, oil accounts for 47.2% of Ireland's primary energy requirement making it one of the highest rates of oil dependency in the EU. The International Energy Agency, of which Ireland is a member country, includes a 10-point plan to cut oil use which calls for an acceleration in the deployment of wind and solar projects. Ireland's response per the NESF is set out over three themes:

- Theme 1 – managing the impact on consumers and businesses
- Theme 2 – ensuring security of energy supply in the near-term
- Theme 3 – reducing our dependency on imported fossil fuels in the context of the phasing out of Russian energy imports across the EU

In relation to Theme 3, the NESF highlights that replacing fossil fuels with renewables, including wind energy, will be a focus area of work. The NESF calls for *"Supportive policies across Government and State agencies"* which *"can reduce barriers and fast track permitting for renewable energy generation projects. Similarly, renewable energy developers need to match this through taking a leadership role in delivering high quality applications to relevant consenting authorities, meeting project milestones on*

[21] *National Energy Security Framework (DECC, April 2022)* https://assets.gov.ie/static/documents/national-energy-security-framework.pdf

time and minimising delays". There are a number of 'Responses' set out in the NESF aimed at reducing reliance on imported fossil fuels and increasing indigenous renewable energy generation, including Response 25 which seeks the alignment of all elements of the planning system to support accelerated renewable energy development.

Having regard to the above, it is clear that the provision of additional renewable energy generation, such as the Proposed Project, is vital in helping to secure the State's energy supplies and reduce reliance on imported fossil fuels.

Energy Security in Ireland to 2030 – Energy Security Package

Published in November 2023, the energy security package titled 'Energy Security in Ireland to 2030' builds on the policies set out in the NESF. The energy security package is based on the recognition of the following fact:

> *"Ireland's future energy will be secure by moving from an oil-, peat-, coal- and gas-based energy system to an electricity-led system maximising our renewable energy potential, flexibility and being integrated into Europe's energy systems."*

The energy security package includes a range of measures to implement this approach by the prioritisation of the following:

1. *Reduced and Responsive Demand.*
2. *Renewables-Led System.*
3. *More Resilient Systems*
4. *Robust Risk Governance.*

Independent research undertaken as part of the package, McCarthy Report[22], provides an analysis of developments in the electricity sector in Ireland. The McCarthy Report makes the following observation in relation to the consenting process:

> *"The problem of delays encountered by major infrastructure projects, including in the electricity system, due to planning and environmental consent issues was evident. They had been commented upon by the International Energy Agency in its 2019 review of Ireland which named planning delays as the principal challenge to delivery of policy for the sector."*

A key finding from the technical analysis conducted as part of the energy security package is the interdependence of energy security on two essential pillars: 'harnessing our indigenous renewable energy resources at speed and at scale and the rapid electrification of energy demand'. As such, the energy security package provides additional measures to supplement the existing measures introduced under previously published government policy documents. The additional measure most relevant to the Proposed Project is as follows:

> *"Action 10: To implement Planning and Consenting System Reforms and provide greater certainty to the sector."*

The energy security package aims to ensure that the planning system is fully aligned and resourced to fully support accelerated renewable energy development. It also aims to ensure renewable energy projects are prioritised in line with the recast Renewable Energy Directive and REPowerEU.

[22] *McCarthy Report (Dermot McCarthy, Jan 2023)* https://assets.gov.ie/static/documents/annex-5-independent-review-on-the-security-of-electricity-supply-mccarthy-report.pdf

The Proposed Project will significantly support the government's objectives in ensuring the State's energy security. The Proposed Project serves as a domestic renewable energy generator capable of providing clean electricity to the national electricity grid, contributing to a renewables-led system.

2.3.2.2 Project Compliance with the National Renewable Energy Policy

The National Energy Security Framework outlines several steps to accelerate Ireland's shift to renewable energy initiatives. It is evident that the Proposed Project aligns with this framework by increasing the proportion of renewable energy on the national grid, thus expediting Ireland's transition to a low-carbon energy future.

2.4 Climate and Renewable Energy Target Progress

At a European level, the latest data shows that, as of 2025, 26.2% of energy came from renewable energy sources[23]. This represents an increase of 1% compared to 2024 levels. While progress is being made to increase the share of renewable energy, it is clear that all EU member states need to intensify their efforts to collectively comply with the target of 42.5% set in the latest revision of the renewable energy directive.

Of the 27 EU member states, Ireland had one of the lowest proportions of renewable energy at 17.2% in 2025[24]. It is evident that Ireland is not performing well when compared against our European counterparts and that urgent action is required to increase the overall share of renewable energy in our gross final energy consumption. When it comes to the share of renewable energy in electricity, Ireland does perform better generating 41.7% in 2025, but still below the EU average of 49.9%[25].

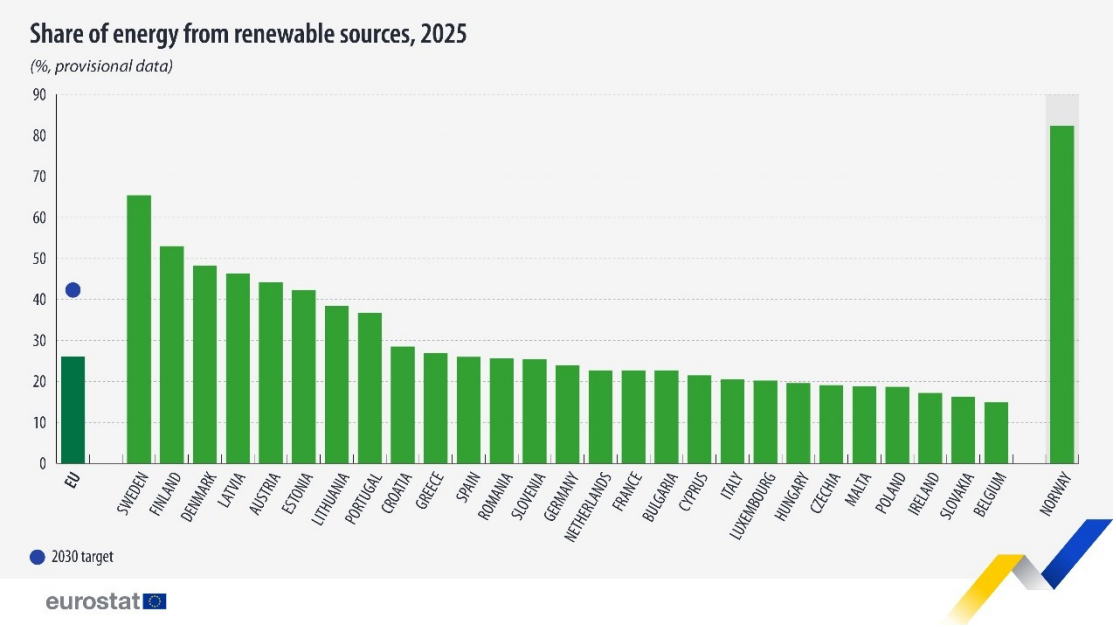


Figure 2-1: Overall share of energy from renewable sources (source: Eurostat)

[23] *Renewable Energy Statistics (Eurostat, July 2026)* https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Renewable_energy_statistics
[24] *Share of energy from renewable sources (Eurostat, 2025)* https://ec.europa.eu/eurostat/statistics-explained/index.php?title=File:Share_of_energy_from_renewable_sources_2025_Graphic_Designer.jpg
[25] *Renewable Energy Statistics (Eurostat, July 2026)* https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Renewable_energy_statistics

Ireland's Greenhouse Gas Emissions Projections 2025-2030 (May 2026)

The EPA published Ireland's Greenhouse Gas Emission Projections and at the time of writing, the most recent report, *'Ireland's Greenhouse Gas Emissions Projections 2025-2030'* in May 2026[26]. The report includes an assessment of Ireland's progress towards achieving its emission reduction targets out to 2030 set under the EU Effort Sharing Regulation (ESR).

The EPA has produced two scenarios in preparing greenhouse gas emissions projections to 2050, a "With Existing Measures" (WEM) scenario and a "With Additional Measures" (WAM) scenario. These scenarios forecast Ireland's GHG emissions in different ways. The WEM scenario assumes that no additional policies and measures, beyond those already in place by the end of 2024. This is the cut off point for which the latest GHG emission inventory data is available, known as the 'base year' for projections. The WAM scenario has a higher level of ambition and includes government policies and measures (at the time the Projections are compiled) to reduce emissions such as those in Ireland's CAP 25.

The EPA Emission Projections Update notes the following key trends:

- Ireland is not on track to meet the 51% emissions reduction target by 2030 (compared to 2018). Full implementation of a wide range of policies and plans across all sectors that deliver carbon savings is required to achieve a projected reduction of 25%.
- Budget period 1 (2021-2025) of 295 Mt CO_2eq is projected to be largely met, with the WEM scenario exceeding the budget by 0.4 Mt CO_2eq, while the WAM scenario projects emission will be 1.8 Mt CO_2eq under budget. With carryover from Budget period 1, Budget period 2 (2026-2030) of 200 Mt CO_2eq is expected to be exceeded by 53 to 81 Mt CO_2eq.
- Of seven sectors with legally binding Sectoral Emission Ceilings, three are projected to remain below their Ceiling in Budget Period 1 (Electricity, Residential Buildings, 'Other'), and only the 'Other' Sector (Waste, F-gas, Petroleum Refining) will remain below its Ceiling in Budget Period 2.
- Ireland is not projected to meet its EU target under the Effort Sharing Regulation of a 42% emissions reduction by 2030 (compared to 2005) even with flexibilities applied. This assessment shows that greenhouse gas emissions will be reduced by 13 to 23% by 2030 without the use of flexibilities, and by 17 to 27% with the use of flexibilities.
- From 10.2 Mt CO_2eq in 2018, emissions from the Energy Industries sector are projected to decrease to between 4.0 and 4.7 Mt CO_2eq in 2030 (a 61% reduction in WAM and 55% decrease in WEM). These projections include greater electricity demand and delays in the delivery of both increased interconnection and offshore wind generation.

As decarbonising electricity generation will have a significant positive contribution in achieving Ireland's emissions it is clear that additional renewable energy production, such as that of the Proposed Project, must be encouraged and supported if carbon saving targets are to be met.

National Energy Projections (October 2026)

The National Energy Projections report[27], published by the SEAI in October 2026, sets out the most recent updates to Ireland's progress towards its binding European and National renewable energy targets.

[26] *Ireland's Greenhouse Gas Emissions Projections 2025-2030 (Environmental Protection Agency, May 2026)* https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA-GHG-Projections-2025-2030-Web.pdf
[27] *National Energy Projections 2026 (Sustainable Energy Authority of Ireland, October 2026)* https://www.seai.ie/sites/default/files/publications/National-Energy-Projections-2026.pdf

In 2023 RED II set an EU wide target for overall RES of 32% RES in 2030. Member states set their national contributions to the EU-wide target, with Ireland setting its at 34.1% in 2030. RED III increased the binding EU-wide target for overall RES to at least 42.5% with Ireland subsequently increasing the target to 43% in 2030.

The decarbonisation of electricity generation is critical considering the need to electrify other sectors such as heating and transport in order to achieve the sectoral decarbonisation targets. By 2030, renewable energy sources are anticipated to dominate electricity generation, particularly experiencing a significant surge later in the decade attributed to the integration of substantial offshore wind projects.

The most notable conclusion drawn from the National Energy Projections report is the significant gap between projections across both the WEM and WAM scenarios and the legally binding national and EU emission reductions targets. The Report states that even with full implementation of CAP24, Ireland is projected to face a significant gap in meeting many legally binding energy and climate obligations, including national carbon budgets and sectoral emissions ceilings, and EU obligations on renewable energy, energy efficiency and greenhouse gas emissions.

Ireland is also projected to fall short of the 2030 renewable-energy share target of 43% under RED III, reaching just 28.5% in the WAM scenario and 25.1% in the WEM scenario. This is stated to be due to delays in deployment of renewables combined with growth in overall energy consumption.

The report states that *"In addition to significant compliance costs, failure to meet these targets carries material risks to energy security and affordability"* and that *"Increasing domestic renewable generation is essential for insulating against global price shocks, but rising demand means ever-greater renewable capacity is required to displace imported fuels."*

The SEAI projections explore the risk scenarios WEM and WAM, the aim being to address the gap between current policy trajectories and the most ambitious planned policies scenarios. The SEAI WEM and WAM scenario modelling considers the latest CAP published at the time of policy assumptions for the modelling scenarios (CAP24).

The Report projects GHG emissions under the WEM and WAM scenarios. In the WEM scenario, total GHG emissions are expected to exceed the carbon budgets for CB1, CB2 and provisional CB3 in 2025, 2029 and 2032, respectively, with a cumulative exceedance of 16% by the end of 2030. In the WAM scenario, cumulative exceedance of 10% is projected by the end of 2030. The projected overall carbon budgets exceedance has reduced from the 2025 projections, though there are still significant risks that this could increase again subject to market changes and the pace of implementation of policy.

Energy in Ireland (October 2026)

In October 2026, the SEAI released an annual publication '*Energy in Ireland'* report (Energy in Ireland Report) which looks at trends in national energy use and at the underlying driving forces, such as the economy and weather, and more recently the impacts of high energy prices. It also examines GHG emissions from energy use, energy security, cost competitiveness, and Ireland's progress towards EU renewable energy targets.

The Energy in Ireland Report identifies that Ireland's national energy-related emissions in 2025 were at their lowest level in over 30 years. Energy-related emissions in 2025 were 29.8MtCO_2eq, down 3.6% on 2024 levels. Electricity-related emissions were 6.3MtCO_2eq in 2025 the lowest on record, down 8.5% from 2024 levels. The following are some of the key points, relating to renewable energy and energy emissions:

- 16% of Ireland's primary energy was renewable in 2025, the highest value to date.
- Ireland used 1.84 TWh more renewable energy in 2025 than in 2024.
- Just under three-quarters of renewable energy in 2025 came from wind, biodiesel, and biomass.

- In 2025, Ireland's RES-Overall result was 17.3%, up from 16.1% in 2024 – the highest value to date.
- Ireland's RES-Overall result was 10.3 percentage points behind its 27.6% milestone target in 2025.
- Gas (40.0%), wind (32.1%), and net imports (16.3%) led Ireland's gross electricity supply in 2025.

Ireland's installed wind capacity in 2025 was 5.10 GW, which indicates a 3.3% increase from the previous year. Ireland's 2025 CAP target for installed wind capacity is 6 GW, and its 2030 CAP targets for onshore and offshore capacity are 9 GW and 5 GW, respectively. SEAI's projections under the WAM scenario indicate a total installed capacity of 8.5 GW by the end of 2030. This WAM scenario is the most optimistic reporting scenario modelled, achieving 59% RES-E by 2030.

The Energy in Ireland Report states that over the last 10-years, Ireland has added wind capacity at an average rate of 0.27 GW per annum, although this has dropped to a rate of 0.16 GW over the last 5-years. To align to the pace of the WAM projections needed to deliver on the 80% RES-E target, the rollout of onshore wind capacity needs to return to the rate previously achieved between 2016 and 2019.

Figure 2-2 from the Energy in Ireland Report copied below, illustrates the year-on-year increase in installed wind capacity required to align to the pace of the WAM.

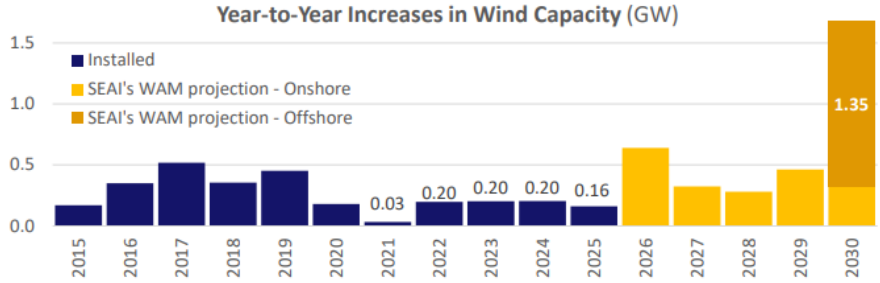


Figure 2-2: Year-to-year increases in installed wind capacity to 2025, and year-to-year increases in WAM capacity projections of capacity from 2025 to 2030

The Energy in Ireland Report also identifies a plateauing of wind generation, which is the largest contributor to renewable electricity, over the last 5 years. Annual wind generation over the last 4 years has been relatively level, increasing by just 5.6% from 2022 to 2025. In contrast, wind generation in the preceding 5 years (2016 to 2020) showed an average annual increase of over 20%.

The Climate Change Advisory Council Annual Review 2025

The CCAC opened their '*Annual Review 2025 - Summary for All*'[28] starkly,

> *"1. Ireland remains substantially off track in meeting its EU and national emissions reduction targets, with progress in the Agriculture and Transport sectors, which collectively account for approximately 55% of Irish emissions, proving particularly slow. The Government is urged to move from ambitious statements to implementing impactful and demonstrable actions that build momentum and public buy-in.*
>
> *2. Failure to meet targets will potentially result in substantial compliance costs, estimated to be in the range of €8–26 billion, and a colossal missed opportunity to invest in Irish households,*

[28] *Annual Review 2025 – Summary for All (CCAC, November 2025)*
https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR-2025-SfA-final.pdf

communities and businesses – creating jobs, improving health and wellbeing, and protecting the most vulnerable in society."

In addition, the standout recommendation from the CCAC is that "*The delay in transposing EU directives into law, particularly in relation to energy, is concerning given the urgent need to transition to a low-carbon energy system. The Council urges the Government to ensure full transposition of all climate- and energy related directives into law in advance of Ireland's presidency of the Council of the European Union in July 2026."*

The Climate Change Advisory Council Annual Review 2026 – Electricity

The CCAC published its annual review in May 2026[29] where it outlines detailed observations and recommendations for the Electricity sector in Ireland. This review emphasises the urgent need for Ireland to accelerate its transition to renewable energy to meet its 2030 electricity capacity targets and adhere to sectoral emissions ceilings. The CCAC states:

"The Government and its agencies should accelerate the key planning and policy reforms needed in 2026 to deliver renewable energy. These include adoption of Regional Renewable Energy Strategies, transposition of the amended EU Renewable Energy Directive and designation of renewables acceleration areas, finalisation of the revised National Ports Policy and development of a coordinated process to support onshore wind repowering within protected areas."

In relation to grid infrastructure, the CCAC states:

"To accelerate delivery of renewable energy and a more efficient electricity system, the Government should ensure that the Critical Infrastructure Bill prioritises electricity grid reinforcement projects, with clear timelines and accountability. The Council supports the acceleration of critical infrastructure for renewable electricity; however, enabled infrastructure must not undermine Ireland's ability to meet the National Climate Objective. Private wires legislation should also explicitly exclude fossil fuel infrastructure in all circumstances."

Key observations in relation to Renewable Electricity are outlined below:

- Ireland reached 7.7 GW of renewables generation capacity by the end of 2025, with 5.1 GW from onshore wind, 1.1 GW from grid-scale solar, 0.8 GW from domestic rooftop solar and 0.7 GW from other renewable sources (e.g. hydro).
- Only 0.6 GW of new solar capacity and 0.2 GW of new wind capacity were added in 2025, far less than the 2 GW that needs to be added each year until 2030 to hit Climate Action Plan targets.
- 2025 saw the failure of multiple key Climate Action Plan targets, including both onshore wind and solar capacity, dispatch-down and renewable electricity share of demand. The renewable electricity share of demand has stagnated in recent years due to any added renewable generation capacity being matched by increasing data centre electricity demand.

Ireland's Climate Change Assessment (January 2024)

In January 2024, the EPA published Ireland's Climate Change Assessment (ICCA). This assessment provides a comprehensive overview and breakdown of the state of knowledge around key aspects of climate change with a focus on Ireland. The ICCA report is presented in four volumes.

[29] *Annual Review 2026 – Electricity (CCAC, May 2026)*
https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR2026-2-electricity-final.pdf

- Volume 1: Climate Science – Ireland in a Changing World
- Volume 2: Achieving Climate Neutrality in 2050
- Volume 3: Being Prepared for Ireland's Future
- Volume 4: Realising the Benefits of Transition and Transformation

The ICCA Synthesis Report states that having peaked in 2001, Ireland's GHG emissions have reduced in all sectors except agriculture. However, Ireland currently emits more GHGs per person than the EU average. The ICCA Synthesis Report goes on to state that there has been an identified gap in policy that indicates that Ireland will not meet its statutory GHG emission targets. Achieving net-zero carbon dioxide emissions by 2050 requires significant and unprecedented changes to Ireland's energy system. Policies tailored to suit different stages of technology development are critical for achieving a net zero energy system. Established technologies, such as wind energy, solar photovoltaics and bioenergy will be key in meeting short-term emission reduction targets (i.e. 2030), whereas offshore wind infrastructure is expected to be the backbone of future energy systems. This can only be achieved with appropriate support schemes, regulation and investments for synergistic growth of offshore wind and other renewable technologies.

In relation to Ireland's target of achieving net-zero carbon dioxide emissions by 2050 and the role renewable energy will contribute to this; the ICCA Synthesis Report states the following:

> *"There are well-established 'no-regret options' that need to happen now, which can get Ireland most of the way to net zero carbon dioxide emissions. Beyond that, there are 'future energy choices' relating to the scale and magnitude of technologies that will assist in achieving Ireland statutory climate targets. Ireland's no-regret options are demanding reduction (e.g. through energy efficiency and reduced consumption), electrification (e.g. electric vehicles and heat pumps), deployment of market-ready renewables (e.g. wind energy and solar photovoltaics) and low-carbon heating options (e.g. district heating); Ireland's future choices include hydrogen, carbon capture and storage, nuclear energy and electro-fuels. Renewable energy can increasingly provide our future energy needs but will need to be complemented with carbon dioxide removals to achieve a net zero energy system in hard-to-abate sectors."*

2.5 Cutover Peatlands and Climate Change

2.5.1 Introduction

Beginning in 1946, Bord na Móna (BnM) acquired extensive peatlands and associated areas principally for the industrial harvesting of peat for energy (electricity production and briquettes) and as horticultural growing media. These lands extend in total to about 80,000 hectares and are located mainly in the Irish midlands. In January 2021, BnM formally decided to cease industrial scale peat extraction on its land bank.

BnM has been examining a range of after uses of its land bank post peat extraction primarily since the 1970's and 80's[30]. Potential uses examined and developed include forestry, amenity, high-value biodiversity and more recently the co-location of large-scale renewable energy production with existing and previously identified uses. With BnM land bank large tracts of cutover and cutaway peatlands have been rehabilitated, are currently undergoing rehabilitation, or will be undergoing rehabilitation in the coming years.

CAP 25 recognises the role that peatland rehabilitation has in achieving Ireland's GHG emission reduction targets. Returning peatlands to more natural conditions will reduce carbon emissions and deliver a range of climate benefits, including long-term carbon storage; increased carbon sequestration; and enhanced resilience to the locked-in impacts of climate change. The improvements to peatlands

[30] *Strategic Framework for the Future use of Peatlands. Bord na Móna May 2011*

will enrich Ireland's natural capital; increase ecosystem services; strengthen biodiversity; and improve water quality and storage attenuation; as well as developing amenity potential.

Peatland rehabilitation and wind farm development have been proven to successfully coexist, as seen with BnM's Cloncreen Wind Farm, BnM Mountlucas Wind Farm and other similar sites across Ireland. These projects demonstrate how renewable energy generation and ecological restoration can operate in parallel, delivering both climate and biodiversity benefits. Please see Section 2.5.4 below for further details.

The National Planning Framework First Revision (Revised NPF) was approved by the Government on the 8th of April 2025 and subsequently approved by both houses of the Oireachtas. The Revised NPF identifies the following policy priority for the Eastern and Midland Region, where the Proposed Project is located:

> *"Developing the potential of the region in renewable energy terms, in accordance with the capacity allocation targets set out in Chapter 9: Climate Transition and Our Environment, across the technological spectrum from* ***wind*** *and solar to biomass and, where applicable, wave energy,* ***focusing in particular on the extensive tracts of publicly owned peat extraction areas in order to support a managed just transition of local economies to greener energy****."* (emphasis added)

The Revised NPF highlights the opportunities available for the co-location of renewable energy development and post-industrial peatlands.

> *"The roll-out of renewables and protection and enhancement of carbon pools such as forests, peatlands and permanent grasslands. It is necessary to ensure that climate change continues to be taken into account as a matter of course in planning-related decision making processes."*
>
> ***"Opportunities also exist for co-location of renewable technology in areas****, alongside transport infrastructure corridors, within forestry lands, and* ***on industrial and post-industrial peatlands****."* (emphasis added)

The Proposed Project, which comprises a renewable energy development located within a peatland setting, aligns with the policies and objectives of the Revised NPF. The Proposed Project will generate and supply renewable energy to the national grid, supporting National Strategic Outcome 8: *"Transitioning to a low carbon and climate resilient economy*". It will also support NPO 74 and NPO 75 which provide for additional renewable energy capacity allocations in each Regional Assembly and its delivery.

2.5.2 Cutover Peatland Rehabilitation

The CAP23 peatland rehabilitation aim in Ireland focused on restoring degraded peatlands to enhance carbon sequestration, biodiversity, and water regulation, while under CAP25, the initiative continues with expanded funding and targets, though implementation remains variable and progress is still being evaluated against environmental benchmarks. The EU Nature Restoration Law[31] mandates the restoration of degraded peatlands, requiring EU Member States to implement rehabilitation measures. The updated rehabilitation target under the EU Nature Restoration Law identifies 30% of peatlands to be rehabilitated by 2030, 40% by 2040, and 50% by 2050.

Europe's nature is in decline, with more than 80% of habitats in poor condition. The EU Nature Restoration Law aims to restore ecosystems, habitats and species across the EU's land and sea areas in order to:

[31] *Regulation (Eu) 2024/1991 of the European Parliament and of the Council of 24 June 2024 on nature restoration and amending Regulation (EU) 2022/869* https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R1991&qid=1722240349976

- Increase biodiversity;
- Secure the things nature does for free, (i.e., cleaning water and air, pollinating crops, protecting us from floods);
- Limit global warming to 1.5°C; and
- Build up Europe's resilience and strategic autonomy preventing natural disasters and reducing risks to food security.

The proposal combines an overarching restoration objective for the long-term recovery of nature in the EU's land and sea areas with binding restoration targets for specific habitats and species. The measures will cover at least 20% of the EU's land and sea areas by 2030, and ultimately all ecosystems in need of restoration by 2050.

BnM is following a decarbonisation strategy aimed at reducing the carbon emissions from its activities that will support the CAP25. BnM's 'Brown to Green' strategy is focused on supporting and delivering Ireland's objective, to become carbon neutral by 2050.

One of the most straightforward ways to reduce carbon emissions from land use is the managed rewetting of peatlands. The first step is ceasing industrial peat extraction, which ceased on the Project Site in June 2020. Re-wetting peatlands reduces carbon emissions by restoring the water table, which slows the oxidation of peat and prevents further carbon loss. It stabilises the remaining peat in the ground and supports the development of more resilient cutaway peatland habitats. As these habitats recover, both greenhouse gas emissions and carbon losses via water runoff are reduced.

There is broad international consensus that restoring hydrology in degraded peatlands reduces carbon emissions and can, over time, improve carbon storage. Researchers in Ireland have also reached the same conclusion for Irish peatlands. The EPA funded the BOGLAND project (Renou-Wilson et. al., 2011) and concluded that the managed re-wetting of Irish bogs was essential for returning damaged peatlands on a trajectory towards becoming peat-forming ecosystems again. The EPA-funded Carbon Restore Project (Renou-Wilson et. al., 2011) also reported that actively managed rewetting of drained peatlands in Ireland can lead to restoration of functional peatland, such as the return of typical plant and animal species, which in turn may lead to the restoration of peat-formation and the Carbon-sink function. More recent research builds on these findings including the WET-PEAT project (2024) is refining the understanding of rewetting effectiveness across a network of Irish sites through advanced hydrological and GHG modelling, the Peat Hub Ireland project (2025) which has synthesised two decades of Irish peatland research and reconfirmed rewetting as central to sustainable peatland management. The CARE-PEAT programme (2019–2023) quantified the carbon benefits of rewetting across multiple peatland types and produced a decision-support tool for restoration planning. This is further supported by Gatis et al. (2023) who found that rewetting of an upland peatland significantly increased water storage, stabilised water tables and reduced discharge, all hydrological changes recognised as preconditions for reducing peat oxidation and carbon loss key processes that slow peat oxidation and carbon loss.

BnM lands, including the Proposed Wind Farm site, are operated under the EPA Integrated Pollution Control (IPC) Licensing regime. IPC licence Ref. P0503-01, which pertains to the Allen Bog Group, is the IPC licence relevant to the part of the Project Site located on part of the Allen Bog Group (i.e., the Proposed Wind Farm site). Condition 10 of the IPC licence relates to decommissioning and rehabilitation. Condition 10 states that following termination of use or involvement of all or part of the site in the licensed activity, the licensee shall implement the agreed cutaway bog rehabilitation plan.

The rehabilitation works that are proposed (as part of compliance with Condition 10 of the IPC Licence) within the Project Site are detailed in the draft Cutaway Bog Decommissioning and Rehabilitation Plan (Draft Rehabilitation Plan) (Appendix 2-4 of this EIAR). The Draft Rehabilitation Plan forms part of BnM's obligations under the IPC Licence and therefore does not form part of this application. The Draft Rehabilitation Plans will be finalised and agreed with the EPA prior to implementation.

The Peatland Climate Action Scheme (PCAS)[32] is a programme of enhanced peatland rehabilitation measures with the primary aim of optimising climate action benefits of rewetting former industrial peat extraction areas by creating soggy peatland conditions that will allow compatible peatland habitats to redevelop. These measures are separate to those defined by the IPC Licence. This programme has been developed to optimise ecosystem service benefits of peatland rehabilitation and restoration, particularly carbon storage and reducing carbon emissions. In addition, this will also benefit biodiversity and water (water quality and catchment management), as well as providing space for local communities and people to enjoy the outdoors. PCAS is supported by Government through the Climate Action Fund and Ireland's National Recovery and Resilience Plan administered by the Department of Environment, Climate and Communications (DECC). Please see https://www.bnmpcas.ie/ for details. The National Parks and Wildlife Service (NPWS) acts as the Scheme regulator and there is ongoing engagement with the EPA. To date the PCAS has rehabilitated approximately 24,503ha of peatland[33].PCAS activities are completed at Lodge Bog within the Project Site.

2.5.3 Benefits of Cutover Peatland Rehabilitation

The key objective of cutover peatland rehabilitation is environmental stabilisation. This involves stabilising the bare peat surfaces, slowing water movement across the bog and trapping mobile silt. Raised bogs need certain types of mosses, collectively known as 'sphagnum', to grow in order for peat to form. In cutaway bogs, where the water chemistry and environmental conditions no longer support the growth of sphagnum, the bogs cannot be restored to peat-forming conditions. These bogs are rehabilitated to form other habitats instead.

In a broad sense, cutover peatland rehabilitation aims first to retain water on a site for longer periods, promote the revegetation of bare peat areas and reduce the potential for material and carbon loss, whether through atmosphere emissions or via surface water discharge. A number of research papers and reports have been completed over the last decade that have focussed on measurement of the effect of rewetting of peatlands on carbon emissions in the Irish context. Wilson et al. published a paper in 2016 (Multiyear greenhouse gas balances at a rewetted temperate peatland)[34] that assessed the variation in carbon emissions arising from a former cutover BnM peatland that had undergone decommissioning and rehabilitation. The paper demonstrated that rewetting had led to a significant reduction in greenhouse gas emissions. It was postulated that under the correct conditions a cutover peatland site would stabilise in the coming decades and may become similar to intact peatlands in terms of greenhouse gas dynamics.

The Network Monitoring Rewetted and Restored Peatlands/Organic Soils for Climate and Biodiversity Benefits (NEROS) report was published by the EPA in 2018.[35] The report outlined research on rewetting carried out on a range of degraded peatland sites. The list of sites assessed included Blackwater and Bellacorick bogs both of which had undergone industrial peat extraction and both within the BnM landbank. The report recognised the challenges of rewetting over large landscapes like cutover industrial peat extraction sites. It also recognised that on this type of site there is potential for a mosaic of habitats to form and that not all of those habitats will act as carbon sinks. The report concludes that drained peatlands should be targeted for rewetting as a climate change mitigation strategy.

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[32] The Peatlands Climate Action Scheme (PCAS) is also referred to as the Enhanced Decommissioning, Rehabilitation and Restoration Scheme (EDRRS). https://www.bnmpcas.ie/
[33] Update on total hectares rehabilitated to date – 24,503 ha at the end of May 2026 https://www.bnmpcas.ie/news-and-updates/
[34] Multi-year greenhouse gas balances at a rewetted temperate peatland (Wilson D. et. al., 2016) https://www.researchgate.net/publication/301563228_Multi-year_greenhouse_gas_balances_at_a_rewetted_temperate_peatland
[35] Network Monitoring Rewetted and Restored Peatlands/Organic Soils for Climate and Biodiversity Benefits (NEROS) (Wilson D. et. al., 2018) https://www.epa.ie/publications/research/reports/Research_Report_236.pdf

In July 2022, Wilson et al. published a research article in Global Change Biology, '*Carbon and climate implications of rewetting a raised bog in Ireland*'[36], which recognises that the premise of rewetting of drained or degraded peatlands to assist in climate change mitigation has gained considerable traction in recent years underpinned by the growing body of research where the main components of the peatland carbon (C) cycle: carbon dioxide (CO_2), methane (CH_4), dissolved organic carbon (DOC) have been quantified in a wide range of peatland types along a drainage continuum (natural-drained-rewetted).

The study was located on a raised bog in Moyarwood, Co. Galway of c. 230ha that had been subject to mechanical peat extraction on the margins for decades. The bog had been extensively drained in the 1980's with drainage ditches located every 15m but milled peat extraction never commenced. In 2012 a rewetting programme was undertaken involving blocking drains with peat dams at regular intervals. Wilson et al. found that it was clear that rewetting when combined with revegetation could rapidly switch the study area from a large carbon dioxide source to a small net carbon dioxide sink in year 1, which increased further in years 3–5. The authors postulate that this initially strong carbon dioxide sink is likely to weaken over time, stabilising at levels comparable to natural, undisturbed peatlands as the site matures.

Other research cited in the article has demonstrated that practical management actions, such as drain blocking, the installation of berms and the construction of peat cells can have a profound effect on peatland carbon dynamic. It is important to note that irrespective of the mechanism under which the cutover peatland is rehabilitated (either rehabilitation as required by Condition 10 of the IPC licence or enhanced rehabilitation under PCAS, Biodiversity Net Gain or other schemes) rewetting forms a key part of the measures implemented on those sites.

2.5.4 Wind Farms and Cutover Peatland Rehabilitation

Onshore wind farm development plays a major role in meeting Ireland's GHG reduction commitments. CAP25 reaffirms the 9GW of onshore renewable energy generation target from wind development by 2030. The footprint of the physical infrastructure associated with an onshore wind farm on BnM land holdings varies between 2 and 4% of each site. Therefore, in excess of 95% of the remaining cutover peatland outside the wind farm development footprint is available for rehabilitation.

The existing Mountlucas Wind Farm (84MW – 28 Turbines) was developed on cutover peatlands and completed construction in 2014. Targeted rehabilitation has been incorporated into the site following energisation of the Mountlucas Wind Farm as shown on Plate 2-1 below.

[36] *Carbon and climate implications of rewetting a raised bog in Ireland (Wilson D. et. al., July 2022)* https://doi.org/10.1111/gcb.16359



Plate 2-1 Aerial Image of Mountlucas wind farm on rehabilitated cutover peatlands (2021)

The existing Cloncreen Wind Farm (75MW- 21 turbines) began delivering energy to the electricity grid in the Autumn of 2022. Similar to the Proposed Wind Farm site, the peat source at Cloncreen has undergone years of industrial peat extraction. Since commissioning of the Cloncreen Wind Farm, rehabilitation works have been completed on the land area at Cloncreen that is not occupied by the permanent footprint of the wind farm infrastructure. See Plate 2-2 and 2-3 below.



Plate 2-2 Peat dams installed on cutover bog within the Cloncreen Wind Farm



Plate 2-3 Rewetted areas within Cloncreen Wind Farm

The experience across a range of wind farm sites demonstrates that peatland rehabilitation and wind farm development can co-exist successfully. Since the cessation of peat extraction in 2020 at the Proposed Wind Farm site and the increased urgency to develop renewable energy alternatives, it has generally been accepted by policy makers at national, regional and local level that the cutaway bogs present high-potential locations for renewable energy infrastructure. For example, the National Planning Framework First Revision (2025) states that 'In relation to peatlands, some of Ireland's cutaway bogs are suitable to facilitate the generation of energy, most notably wind/biomass'.

The opportunity to develop and deliver renewable energy infrastructure on land that can function as a carbon store and has the potential to revert to a carbon sink as well as enhance wildlife habitats presents a unique opportunity to meet Ireland's climate change and biodiversity enhancement commitments within the same site.

2.6 Planning Policy Context

2.6.1 Introduction

This section of the EIAR provides the strategic planning context of the Proposed Project. As is examined below, the Proposed Project is in line with national, regional and local policies, frameworks, guidelines and plans. This section has been broken down to the following sections:

- National Policy Context
- Regional Policy Context
- Local Policy Context
- Other Relevant Material Considerations

As a renewable energy project, the Proposed Project is consistent with the overall national policy objectives to increase penetration and deployment of renewable energy resources and has been designed in the context of the relevant wind energy and other guidelines. The specific compliance with the National, Regional and Local/County Development Plan provisions is dealt with in detail in the sections below.

2.6.2 National Planning Policy

National Planning Framework First Revision (2025)

On 8th April 2025, the Government approved the National Planning Framework First Revision (Revised NPF) which was subsequently passed through both Houses of the Oireachtas. The Revised NPF aims to address changes that have occurred in Ireland since 2018.

The Revised NPF provides an updated projection for the population of Ireland, with the population expected to increase to 6.1 million by 2040. This population growth will place further demand on both the built and natural environment, and subsequently, the services required to meet said demands. To strengthens and facilitate more environmentally focused planning at the local level, the Revised NPF states that future planning and development will need to:

> *"Tackle Ireland's higher than average carbon-intensity per capita and enable a national transition to a competitive low carbon, climate resilient and environmentally sustainable economy by 2050, through harnessing our country's prodigious renewable energy potential."*

National Strategic Outcome 8 *('Transition to a Carbon Neutral and Climate Resilient Society')* notes that in creating Ireland's future energy landscape, new energy systems and transmission grids will be necessary to enable a more distributed energy generation which connects established and emerging energy sources, i.e. renewables, to major sources of demand.

Chapter 9: Climate Transition and Our Environment, aims to address key national environmental challenges including the transition to a climate neutral economy, sustainable land management, renewable energy and resource efficiency. As per **NPO 70**, the Revised NPF highlights the importance of renewable energy infrastructure to achieve national climate action targets.

> *"Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a climate neutral economy by 2050."*

Regional Renewable Energy Capacity Allocations have been introduced under the Revised NPF. This was one of the key actions for CAP24 and is supported under CAP25. The Eastern and Midlands Region, in which the Proposed Project is located, is allocated a target of installing an **additional 1,966 MW of onshore wind energy by 2030**, the largest of the three regional Renewable Power Capacity Allocations.

Under **NPO 74** Regional Assemblies are required to plan for the delivery of the regional renewable electricity capacity allocations outlined in the Revised NPF and identify allocations for each of the local authorities within their Regional Spatial and Economic Strategies (RSES). Furthermore, **NPO 75** requires Local Authorities to plan for the delivery of Target Power Capacity (MW) allocations consistent with the relevant RSES, through their City and County Development Plans. At the time of writing, no local Target Power Capacity allocations have been established, however it is clear from the regional allocation that the Eastern and Midland region is set to deliver a significant amount of onshore wind energy in the coming years.

The introduction of renewable energy targets represents a more active and prescriptive approach to land use planning for renewable energy development. The Revised NPF aligns the national target of 9GW of onshore wind energy with the policies and objectives of Local Authorities. In regard to this, it is clear that the provision of new renewable energy generation through the Proposed Project is in line with aims and objectives of the Revised NPF, which seeks to transition to a carbon -neutral economy.

The Revised NPF states that '*opportunities also exist for **co-location of renewable technology** in areas, alongside transport infrastructure corridors, within forestry lands, and on industrial and **post-industrial***

peatlands. Furthermore, it states that '*in relation to peatlands, some of* ***Ireland's cutaway bogs are suitable to facilitate the generation of energy, most notably wind/biomass****. Considering the significant amount of peatlands in the ownership of semi-State bodies, a medium to longer-term strategic national land use plan for peatlands in State ownership will be prepared in order to manage their most appropriate future use, building on the existing National Peatlands Strategy and other national policy related to peatlands conservation and management*' (emphasis added).

For the Eastern and Midland Region in particular, the Revised NPF states the priority of '*developing the potential of the region in renewable energy terms ... across the technological spectrum from wind and solar to biomass ... focusing in particular on the extensive tracts of publicly owned peat extraction areas in order to support a managed just transition of local economies to greener energy'*.

The Proposed Project will support the policies and objectives of the NPF in relation to renewable wind energy and peatlands by co-locating a wind energy development within a peatland setting. The Proposed Project will support the Eastern and Midland's Region to achieve its renewable energy generation potential, particularly in peat extraction areas, supporting a just, low-carbon and climate resilient transition.

National Development Plan 2021-2030

The National Development Plan 2021 – 2030 (NDP) was published on the 4th of October 2021 and sets out the major public investment projects identified by the Government which are to play a significant role in addressing the opportunities and challenges faced by Ireland over the coming years such as housing, health, population growth, and – most relevant to the Proposed Project – climate change.

Reflecting on the recent publication of the IPCC's 6th Assessment Report, the NDP notes that the Irish Government is fully committed to 'playing its part' to ensure that the worst climate change damage can be avoided, e.g., significant reductions in carbon dioxide and other GHG emissions as assisted by the achievement of both European and national renewable energy targets. Specifically, the NDP states that,

> *"The next 10 years are critical if we are to address the climate crisis and ensure a safe and bright future for the planet, and all of us on it.*
>
> *The investment priorities included in this chapter [Ch. 13] must be delivered to meet the targets set out in the current and future Climate Action Plans, and to achieve our climate objectives. The investment priorities represent a decisive shift towards the achievement of a decarbonised society, demonstrating the Government's unequivocal commitment to securing a carbon neutral future."*

Notwithstanding this, the NDP acknowledges that it is not its role to set out a specific blueprint for the achievement of Ireland's climate targets; but as noted above, facilitate capital investment allocations for the climate and environmental strategic priorities.

One of the NDP's strategic climate priorities is the need for low-carbon, resilient electricity systems; specifically, the plan commits to increasing the share of renewable electricity up to 80% by 2030. This is characterised by the NDP as an *'unprecedented commitment to the decarbonisation of electricity supplies'* which, is certainly ambitious and an explicit driver for the deployment of new renewable generators, e.g., the Proposed Project, and the safeguarding / maintenance of existing assets. It is noted that the reliability of electricity supplies will also be strengthened through investment in the electricity transmission and distribution grid. The focus of investment in regulated network infrastructure is to contribute to a long-term, sustainable and competitive energy future for Ireland.

2.6.2.2 Project Compliance with National Policy

With regard to the above, it is considered that the Proposed Project is in line with and supported by the Revised NPF, and the NDP.

The Revised NPF projects a population increase of approximately one million people by 2040 and therefore recognises the strain and demand this will put on Ireland's energy system. To ensure Ireland delivers on its renewable energy and carbon emission reduction targets, the NPF recognises the need for increased renewable energy onto the national grid. This shift from fossil fuels is dependent upon projects such as the Proposed Project which will add c. 322MW of renewable energy to Ireland's renewable energy capacity.

The NDP is clear in its priority to reach a low-carbon, climate-resilient society over the lifetime of the NDP. The Proposed Project, if permitted, will provide clean, renewable electricity to the national grid, furthering development objectives of the NDP, namely the target to increase the share of renewable electricity up to 80% by 2030.

Given the projected population increase, it is considered that unless the share of renewable energy on the grid is substantially increased, Ireland will continue to fall short of its national and international emissions reduction targets. The addition of 46 no. wind turbines, with an estimated electricity generation capacity of c. 322MW, will significantly contribute to Ireland's national targets and support the country in meeting its renewable energy and carbon emission reduction goals at the EU level.

2.6.3 Regional Planning Policy

Regional Spatial & Economic Strategy for the Eastern and Midland Regional Assembly (EMRA)

The Eastern and Midland Regional Assembly (EMRA) established in January 2015, is part of the regional tier of governance in Ireland and is primarily focused on the preparation and implementation of RSES, integration of Local Economic and Community Plans (LECPs), management of EU Operational Programmes, EU project participation, implementation of national economic policy, and working with the National Oversight and Audit Commission. The RSES adopted by the Assembly on the 28th of June 2019 provides a long-term, strategic development framework for the future physical, economic and social development of the Eastern and Midland Region. The RSES seeks to achieve balanced regional development and full implementation of Project Ireland 2040 – the National Planning Framework.

The principal statutory purpose of the RSES is to support the implementation of the Project Ireland 2040 NPF and NDP and the economic policies and objectives of the Government. The RSES aims to build on the region's strengths and potential to become a more prosperous, sustainable, climate resilient and attractive region for the benefit of all its people up to 2040 and beyond.

The Eastern and Midland region is characterised by the RSES as being *'major load centre on the Irish electricity transmission system'*. The RSES also acknowledges that *'Reducing energy emissions will require transition from fossil fuels (including peat-fired stations in the Midlands) and high embodied carbon products, towards renewable energy and biobased products'*. In order to facilitate the growth of renewables within the region, the RSES notes that the EMRA aims to encourage stakeholders, i.e., industry, commercial, etc., to be the first to facilitate new opportunities and concentrate on possibilities to further advance renewable energy generation and use.

The RSES identifies the diversification and growth of smart specialisation of local economies (including energy and renewables, bioeconomy and circular economy) with a focus generating electricity supply from indigenous renewable sources in the Midlands to supporting the 'Just Transition'. In this regard, the RSES clearly acknowledges that the Region's current reliance on traditional power sources (e.g.,

fossil fuels such as coal, peat and oil-fired generators) is not a sustainable long-term strategy, and in light of the climate change emergency occurring both within Ireland and at a broader global scale, the establishment of a low-carbon power system based on renewable energy is necessary pre-requisite for future development.

> *"The Strategy supports an increase in the amount of new renewable energy sources in the Region. This includes the use of wind energy – both onshore and offshore, biomass, and solar photovoltaics and solar thermal, both on buildings and at a larger scale on appropriate sites in accordance with National policy and the Regional Policy Objectives outlined in this Strategy.*
>
> *It is necessary to establish a consistency of approach by planning authorities, both in identifying areas suitable for renewable energy development and having regard to potential impacts, inter alia on biodiversity, landscape and heritage."*

Building on the above aim, the RSES identifies several key drivers required to support and facilitate the electricity generation via indigenous renewable sources:

- Facilitating the provision of appropriate renewable energy infrastructure and enabling technologies;
- Expansion and upgrading of the grid with the aim of increasing the share of variable renewable electricity that the all-island system can accommodate onshore wind, bioenergy, solar and offshore energy;
- Moving from carbon intense fossil fuel generation to lower emissions fuels such as natural gas; and
- The need to ensure sufficient electricity to meet increased demand.

These strategic aims are captured in Regional Policy Objectives (RPOs) 7.35 and 7.36:

- **RPO 7.35:** EMRA shall, in conjunction with local authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. The Strategic Energy Zones for the Region will ensure all environmental constraints are addressed in the analysis. A regional landscape strategy could be developed to support delivery of projects within the Strategic Energy Zones.

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

The RSES identifies the following in relation to development of energy infrastructure to meet projected demand levels, to ensure "...a long-term, sustainable and competitive energy future for Ireland":

- **RPO 10.20:** Support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the Region and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy. This includes the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity and gas transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and the planning process.
- **RPO 10.22:** Support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned growth and transmission/

distribution of a renewable energy focused generation across the major demand centres to support an island population of 8 million people. Facilitate the delivery of the necessary integration of transmission network requirements to allow linkages of renewable energy proposals to the electricity transmission grid in a sustainable and timely manner.

- **RPO 10.23:** Support EirGrid's Implementation Plan 2017 – 2022 and Transmission Development Plan (TDP) 2016 and any subsequent plans prepared during the lifetime of the RSES that facilitate the timely delivery of major investment projects subject to appropriate environmental assessment and the outcome of the planning process.

The RSES is ultimately supportive of the future growth of renewable energy technology in the region and sets a clear precedent to identify and capitalise on those opportunities associated with the transition to renewable energy generation.

2.6.3.2 Project Compliance with Regional Planning Policy

The RSES for the Eastern and Midlands Region states that the region has a crucial role to play in Ireland's transition to a low-carbon future. It is considered that the provision of the Proposed Project would facilitate this just transition and is particularly in line with RPO 7.35, 7.36, 10.20, 10.22 and 10.23 as outlined above.

In the region, a noticeable trend has emerged to recognise and take advantage of emerging opportunities related to the move towards a decarbonized economy, following the region's objective to *"shift from its reliance on using fossil fuels and natural gas as its main energy source to a more diverse range of low and zero-carbon sources, including renewable energy and secondary heat sources"*, particularly in support of renewable energy generation. Therefore, the Proposed Project is considered to be in line with Regional Policy.

2.6.4 Local Planning Policy

The Project Site falls within the administrative areas of Offaly County Council and Kildare County Council, and therefore, is subject to the planning policies and objectives set out in the Offaly County Development Plan 2021-2027 and the Kildare County Development Plan 2023-2029.

2.6.4.1 Offaly County Development Plan 2021-2027

The Offaly County Development Plan 2021-2027 (OCDP) was adopted on the 10th of September 2021 and came in to effect on the 20th of October 2021. The OCDP outlines the overall strategy for the proper planning and sustainable development of County Offaly. The OCDP and accompanying documents (including the Wind Energy Strategy) set out the key policy context for the development of Offaly County.

The importance of climate action is outlined in 'Chapter 3: Climate Action and Energy' of the OCDP. The strategic aim of Chapter 3 is outlined below:

> *"To achieve a transition to an economically competitive, low carbon climate resilient and environmentally sustainable county, through reducing the need to travel, promoting sustainable settlement patterns and modes of transport, and by reducing the use of non-renewable resources, whilst recognising the role of natural capital and ecosystem services in achieving this".*

Furthermore, the OCDP includes the following policies in relation to climate action and reducing GHG emissions, which aligns the County with wider European, national and regional objectives:

- **CAEP-07:** It is Council policy to support and facilitate European and national objectives for climate adaptation and mitigation as detailed in the following documents, taking into account other provisions of the Plan (including those relating to land use planning, energy, sustainable mobility, flood risk management and drainage);
    - Climate Action Plan (2019 and any subsequent versions);
    - National Mitigation Plan 2017 (or subsequent editions);
    - National Climate Change Adaptation Framework (2018 and any subsequent versions);
    - Relevant provisions of any Sectoral Adaptation Plans prepared to comply with the requirements of the Climate Action and Low Carbon Development Act 2015, including those seeking to contribute towards the National Transition Objective, to pursue, and achieve, the transition to a low carbon, climate resilient and environmentally sustainable economy by the end of the year 2050; and
    - Offaly Climate Change Adaptation Strategy.
- **CAEP-10**: It is Council policy to support local, regional, national and international initiatives for climate adaptation and mitigation and to limit emissions of greenhouse gases through energy efficiency and the development of renewable energy sources which make use of all natural resources, including publicly owned lands, in an environmentally acceptable manner.
- **CAEP-11**: It is Council policy to support the transition to a competitive, low carbon, climate resilient and environmentally sustainable economy by 2050, by way of reducing greenhouse gases, increasing renewable energy, and improving energy efficiency.

The OCDP sets out relevant policies and objectives which support the continued investment in renewable and wind energy generation in County Offaly:

- **CAEP-25**: It is Council policy to encourage and facilitate the production of energy from renewable sources, such as from bioenergy, waste material, solar, hydro, geothermal and wind energy, subject to proper planning and environmental considerations.
- **CAEP-37:** It is Council policy to recognise the importance of wind energy as a renewable energy source which can play a vital role in achieving national targets in relation to reductions in fossil fuel dependency and therefore greenhouse gas emissions.
- **CAEP-38:** It is Council policy that in assessing planning applications for wind farms, the Council shall:
    - have regard to the provisions of the Wind Energy Development Guidelines 2006, the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change 2017 and the Draft revised Wind Energy Guidelines 2019 which are expected to be finalised in the near future;
    - have regard to 'Areas Open for Consideration for Wind Energy Developments' in the Wind Energy Strategy Designations Map from the County Wind Energy Strategy;
    - the impact of the proposed wind farm development on proposed Wilderness Corridors as detailed in Objective BLO-28 of Chapter 4;
    - have regard to Development Management Standard 109 on wind farms contained in Chapter 13 of this Plan; and
    - have regard to existing and future international, European, national and regional policy, directives and legislation.

- **CAEO-03:** It is an objective of the Council to achieve a reasonable balance between responding to government policy on renewable energy and in enabling the wind energy resources of the county to be harnessed in an environmentally sustainable manner.
- **CAEO-04:** It is an objective of the Council to ensure the security of energy supply by supporting the potential of the wind energy (and other renewable) resources of the County in a manner that is consistent with proper planning and sustainable development of the area.
- **CAEO-05:** It is an objective of the Council to implement the Council's Wind Energy Strategy as follows:

1. *In 'Areas Deemed Open for Consideration for Wind Energy Development' as identified in Map No. 10 'Wind Energy Strategy Designations', the development of windfarms and smaller wind energy projects will be considered;*
2. *In all other areas, wind energy developments shall not normally be permitted – except as provided for under relevant exemption provisions in the Planning and Development Regulations 2001 (as amended); and*
3. *Applications for re-powering (by replacing existing wind turbines) and extension of existing and permitted wind farms will be assessed on a case by case basis and will be subject to criteria listed in Development Management Standard 109 contained in Chapter 13 of Volume 1 of this County Development Plan and the Section 28 Ministerial Wind Energy Development Guidelines.*

The OCDP also includes the following in relation to peatlands:

- **CAEP-16** It is Council policy to support the preparation of a comprehensive after use framework plan for the industrial peatlands and associated workshops, office buildings and industrial sites in the midlands and adjacent parts of the north west and southern regions, which meets the environmental, economic and social needs of communities in these areas, and also demonstrating leadership in climate change mitigation and land stewardship. The Council recognises that the industrial peatlands in the midlands are a significant resource will transition to after uses ranging from amenity, tourism, biodiversity services, 'wild areas', flood management, climate mitigation, energy development, industry, education, conservation and many more.
- **CAEP-17** It is Council policy to investigate the potential for a Green Energy Hub on peatlands in the county and facilitate it if possible.
- **CAEP-18** It is Council policy to investigate the feasibility of an energy park with educational and amenity facilities relating to any future development of renewable energy projects of significant scale that comes forward over the lifetime of this Plan. Any development of renewable energy on cutaway bog will be required to provide increased opportunities for amenity access and educational facilities.
- **CAEP-19** It is Council policy that planning applications for development on or immediately adjacent to peatlands shall be accompanied by assessments considering the following issues where relevant; peatland stability, hydrology, carbon emissions balance and ecological impact assessment.
- **CAEO-07** It is an objective of the Council to ensure that renewable energy projects located on peatlands or in close proximity to peatlands do not negatively impact on any rehabilitation measures including enhanced rehabilitation measures (i.e. drain blocking and rewetting).

Variation No. 1 to the OCDP was adopted by OCC on 20th July 2026. The variation replaced the *'Wilderness Corridors'* with *'Peatland and Nature Corridors'* and amended Objective BLO-28, Policy CAEP-38, associated text and mapping. The Proposed Project is located in an area designated as *'Bord na Móna Bogs'* and lies outside the *'Peatland and Nature Corridors'* area identified in Figure 4.9(b) of the OCDP. Accordingly, the amendments introduced through Variation No. 1 do not impact the Proposed Project.

The Proposed Project is considered to be in compliance with the policies and objectives of the OCDP, which clearly supports the delivery of renewable energy developments necessary to meet Ireland's renewable energy and climate targets. Compliance with each individual policy objective above is demonstrated in Table 7-3 of the Planning Report.

Offaly Local Authority Climate Action Plan 2024-2029

The Offaly County Council Local Authority Climate Action Plan 2024-2029 (Offaly LACAP), adopted in February 2024, sets out OCC's intentions to create a low carbon and climate resilient County. It also aligns itself with national climate objectives, which seeks to transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy by 2050. The Offaly LACAP aims to align with the Climate Act and Ireland's legally binding target of a 51% reduction in GHG emissions and a 50% increase in energy efficiency by 2030. The vision of the Offaly LACAP is defined as follows:

> *"To achieve a Climate Resilient, Biodiversity Rich, Environmentally Sustainable and Climate Neutral Economy no later than 2050."*

To support this vision, a mission statement was developed to provide an action-oriented and focused framework that sets out OCC's priorities in delivering on the vision of the Offaly LACAP:

> *"Offaly local authorities will demonstrate leadership by achieving our emission and energy targets by 2030. In doing so we will lead, support and advocate for the broader society to increase their capacity in building climate resilience and increase climate awareness towards achieving a low carbon society."*

The Offaly LACAP acknowledges the County's long-standing association with energy and power generation, arising from the inception of the Turf Development Board Ltd. in 1933. The LACAP states that *"The increase in environmental awareness, the increasing appreciation of the biodiversity and the environmental impact of milling and burning peat on a commercial scale has signalled an inevitable shift towards cleaner fuels."*

County Offaly is identified in the Offaly LACAP as having an estimated 538MW of operational or currently under-construction renewables (wind) and approximately 400MW of wind developments at various stages of the planning process. The County also benefits from a strong electricity network comprising 400kV, 220kV and 110kV infrastructure. OCC has proactively sought collaborations that leverage the HV (high voltage) energy infrastructure across the county, with strong nodes in large part due to the four former or existing power station sites, strategic land banks and renewables capabilities. OCC's strategies promote and support the growth of renewable energy developments, while also seeking to work with land/asset owners such as ESB and BnM to maximise public benefit from those assets in the post-peat context.

The Proposed Project would directly contribute to expanding County Offaly's renewable energy capacity in line with the objectives presented in the Offaly LACAP and support the transition to a climate neutral economy.

Offaly Wind Energy Strategy 2021-2027

The Wind Energy Strategy is an integral part of the OCDP, building upon previous strategies and incorporating updated legislation and policies. The Offaly Wind Energy Strategy (Offaly WES) was prepared with the overall aim to facilitate the development of wind farms to contribute towards International, European, National and Regional climate targets.

Its core objectives include:

1. *"Reflect and plan for technological advances in wind farms over the next number of years.*
2. *Support wind energy as a renewable energy source which can play a vital role in achieving national targets in relation to reductions in fossil fuel dependency and greenhouse gas emissions;*
3. *Identify key areas within the county that are 'Open for Consideration for Wind Energy Developments' or 'Unsuitable for Wind Energy Developments' based on wind speed, access to the electricity grid and substations, and avoidance of adverse impacts on the landscape and designated sites.*
4. *Consider the potential for micro-generation (generation that is less than 11 kW) wind energy developments and for small community-based proposals outside key areas within the county that are 'Open for Consideration for Wind Energy Developments'*
5. *Ensure full compliance with the requirements of EU SEA Directive 2001/42/EC and Statutory Instrument 436/2004 [Planning and Development (Strategic Environmental Assessment) Regulations 2004] on the assessment of the effects of certain plans and programmes on the Environment, and the Planning and Development Act 2000 (as amended), the EU Habitats Directive (92/43/EEC) and EU Birds Directive (2009/147/EC)."*

The strategy employs a step-by-step sieve mapping analysis of the key environmental, landscape and technical criteria to identify suitable locations:

- Step 1: Existing Wind Speeds and accessibility to electricity transmission and distribution grids.
- Step 2: Evaluation of the landscape and its sensitivity for wind energy developments.
- Step 3: Overlay of the Wind Energy Mapping with Landscape Evaluation and Sensitivity Analysis with information regarding built and natural heritage, archaeological and amenity designations in the Development Plan and existing settlements within the county.

As seen in Figure 2-3 below, the Proposed Turbines located in County Offaly are entirely within an area designated *as 'Areas Deemed Open for Consideration'* for Wind Energy Developments. Based on the above assessment, the Offaly WES defines *'Areas Deemed Open for Consideration'* as:

> *"These areas are open for consideration for wind energy development as these areas are characterised by low housing densities, do not conflict with European or National designated sites and have the ability by virtue of their landscape characteristics to absorb wind farm developments."*

'Areas Deemed Open for Consideration for Wind Energy Developments' are considered suitable for wind farm development with good/excellent wind resources, access to grid, appropriate distance from properties and location outside designated sites. A target of minimum **466.3 MW** from these areas is identified in Chapter 3 Section 3.2.7 of the OCDP.

The Development Management Standard 109 contained in the OCDP Chapter 13 of Volume 1 states:

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

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

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

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

When assessed in accordance with the Development Management Standard 109 within the OCDP, the Proposed Project is found to be in compliance, which is demonstrated in detail in Table 7-5 in the Planning Report which accompanies this application.

The Offaly WES also refers to the NPF 2018 in the context of National Strategy Outcome (NSO) 8, which relates to ensuring *"Transition to a Low Carbon and Climate Resilient Society"*. National Policy Objective 55 seeks to *"Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050"*. The Proposed Project will support the aims of these policies in achieving a low-carbon economy by 2050.

It is submitted that the Proposed Project fully complies with the aims and policy objectives of the Offaly WES. The Proposed Wind Farm is located within an area classified as *"Open for Consideration"*, representing the most favourable zoning designation under the WES, please see Figure 2-3 below. In addition, full regard has been given to the guidelines and considerations set out under DMS-109.

2.6.4.2 Kildare County Development Plan 2023-2029

The Kildare County Development Plan 2023-2029 (KCDP) was adopted by the elected members of Kildare County Council (KCC) on the 9th of December 2022 and came in to effect on the 28th of January 2023. It has since undergone amendments under Variations 1, 2, 3, and 4 which were adopted on 31st March 2025, 23rd February 2026, and 27th April 2026, respectively.

The importance of climate action and renewable energy generation is outlined in 'Chapter 7: Energy & Communication' of the KCDP, the strategic aim of which is:

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

The KCDP includes the following policy, objective and action in relation to climate adaptation and mitigation:

- **EC P1:** Reduce our carbon footprint in line with national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emission reductions.
- **EC O1:** Ensure that energy intensive sectors incorporate significant renewable energy sources to reduce their carbon footprint.

The KCDP sets out relevant policies, objectives and actions which support renewable energy generation and the reduction of GHG emissions in County Kildare:

- **EC P2:** Promote renewable energy use generation and associated electricity grid infrastructure at appropriate locations within the built environment and open countryside to meet national objectives towards achieving a net zero carbon economy by 2050.
-
- **EC O2:** Adopt an informed and positive approach to renewable energy proposals, having regard to the proper planning and sustainable development of the area, including community, environmental and landscape impacts and impacts on protected or designated heritage areas / structures.
- **EC O3:** Support initiatives for limiting emissions of greenhouse gases through energy efficiency and the development of renewable energy sources which make use of the natural resources in an environmentally and socially acceptable manner.
- **EC O4:** Support infrastructural renewal and development of electricity and gas networks in the county, subject to safety and amenity requirements, subject to AA screening and where applicable, Stage 2 AA so as to ensure and protect the favourable status of European sites and their hydrological connections. Such developments will have regard for protected species and provide mitigation and monitoring where applicable.
- **EC O6:** Require developers of proposed large scale renewable energy projects to carry out community consultation (including, but not limited to Sustainable Energy Communities, where established) in accordance with best practice and to commence the consultation at the commencement of project planning. Details of all such consultation shall accompany planning applications for proposed renewable energy developments.
- **EC O9:** Ensure that whenever possible and appropriate, community benefits are derived from all renewable energy developments in the county.

The KCDP recognized the county's potential regarding wind energy generation and sets out relevant policies and objectives in support of the same:

- **EC P4:** Have regard to the Department of the Environment, Heritage and Local Government's 'Guidelines for Planning Authorities on Wind Energy Development' (or any subsequent updates) and the Kildare County Council Wind Energy Strategy when assessing planning applications for wind farms.
- **EC O11:** Encourage wind energy developments in suitable locations in an environmentally sustainable manner whilst having regard to Government policy and the County Wind Energy Strategy, while being sensitive to the EU and national target of 30% of land for biodiversity. Subject to AA screening and where applicable, Stage 2 AA so as to ensure and protect the favourable status of European sites and their hydrological connections. Such developments will have regard for protected species and provide mitigation and monitoring where applicable.
- **EC O14:** Support the establishment of a local Community Benefit Fund as part of any significant wind energy development application, which supports the development of local recreation amenities, provides additional community project funding or community owned Renewable Energy projects.
- **EC O15** Require applicants to submit a report addressing the issues contained in Section 6 of the County Wind Energy Strategy 'Considerations for Wind Farm

Development Planning Applications' at application stage. Decommissioning and site rehabilitation plans shall also be submitted at application stage and shall identify sustainable waste management solutions for wind turbine components (battery storage, blades etc.) at end-of-life in accordance with the waste management hierarchy. The disposal of same to landfill will not generally be permitted.

- **EC T1:** Support the target in the Climate Action Plan 2021 for a doubling of existing on-shore wind energy from circa 4GW (today) to 8GW by 2030.

The KCDP acknowledges the history of the County in relation to commercial peat exploitation and recognises the *'potential economic benefit of a transition from fossil fuel-based energy production through to investment in renewable energy'*. Furthermore, the KCDP includes policy in support of long-term strategic planning for industrial peatlands as per Regional Policy Objective 4.84 of the Regional Spatial Economic Strategy:

- **EC P17** Support the preparation of a comprehensive "after use" framework plan for the industrial peatlands and associated workshops, office buildings, industrial sites and power stations in Kildare, acknowledging the significant contribution that these expansive lands make towards the special landscape of the Bog of Allen and its potential to further the growth of tourism to and within the County including the creation of a National Peatlands Park, being a focal point for the environmental landscape, conservation and amenity.
- **EC O51:** Support Bord na Mona in the preparation of a long-term strategic plan for the former industrial peatlands.
- **EC O54** Require an Ecological Impact Assessment to be carried out and submitted with any planning application for energy infrastructure projects (e.g., wind and solar developments).
- **EC O55:** Estimate an overall carbon balance when evaluating renewable energy project applications on peatlands, especially those proposed for wind or solar projects taking into account the lifetime of the project versus the potential carbon sequestration over 1000s of years of a site once rehabilitated fully.
- **EC O57:** Ensure that renewable energy projects located on or near peatlands do not negatively impact on any rehabilitation measures including enhanced rehabilitation measures (i.e. blocking and re-wetting).
- **EC O58** Undertake a peatland stability assessment, carbon emissions balance assessment and hydrological and ecological impact assessments, as required, when developing project proposals for development on peatlands.

The KCDP acknowledges that electricity transmission grid infrastructure is essential to addressing climate change and meeting future energy demands. The policies and objectives related to grid infrastructure development are as follows:

- **EC P19**: Support the development, reinforcement, renewal and expansion of the electricity transmission and distribution grid to provide for the future physical and economic development of Kildare. Such projects shall be subject to AA screening and where applicable, Stage 2 AA. The developments will have regard for protected species and provide mitigation and monitoring where applicable.
- **EC O66:** Facilitate the delivery of necessary integration of transmission network requirements to allow linkages of renewable energy proposals to the electricity transmission grid in a sustainable and timely manner.
- **EC O70:** Facilitate the development of grid reinforcements including grid connections and a trans-boundary network into and through the county and between all adjacent counties. Such projects shall be subject to AA screening and where applicable, Stage 2 AA. The developments will have regard for protected species and provide mitigation and monitoring where applicable.

The KCDP is supportive of the transition from fossil fuel-based energy to renewable energy and acknowledges that this transition will need to be underpinned by a strong electricity transmission network. The Proposed Project is considered to be consistent with the policies and objectives of the KCDP, which supports the transition to renewable energy and the delivery of infrastructure necessary to meet Ireland's national climate and energy targets. Compliance with each individual policy objective above is demonstrated in Table 7-6 of the Planning Report.

Kildare Local Authority Climate Action Plan 2024-2029

The Kildare County Council Local Authority Climate Action Plan 2024-2029 (Kildare LACAP), adopted in January 2024, sets out KCC's intentions to create a low carbon and climate resilient County. It also aligns itself with international and national policy regarding climate action, highlighting the Climate Act and Ireland's legally binding target of a 51% reduction in GHG emissions by 2030. The 'Climate Action Vision for Kildare' is defined as follows:

> *"Kildare County Council will deliver climate action across all council functions and will lead the community of County Kildare in the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral local economy."*

To support this vision, a mission statement was developed to provide an action-oriented and focused framework that sets out KCC's key priorities in delivering both the vision and the ambition of the Kildare LACAP:

> *"The Council is committed to lead in translating National Climate Policy into local actions in Kildare by how we do our business and by supporting and enabling our citizens, communities and stakeholders to increase their capacity to achieve climate resilience and increase climate awareness towards a low carbon society."*

The key themes of this mission include:

- The Council will lead on climate action and will suitably mitigate current sources of emissions within the Council's direct control such as social housing, lighting and the Council's buildings and fleet and will ensure climate resilient public infrastructure and open spaces for all citizens.
- All Council departments will be suitably informed and engaged on the assigned responsibilities for actions under this Plan to ensure a coordinated and comprehensive climate response.
- The Council will engage with citizens, business and communities to increase awareness of climate change, improve climate literacy and enable the requisite levels of behavioural change.
- The Council will collaborate with citizens, business and communities and neighbouring local authorities to establish shared ownership of the vision and actions of this Plan and the national targets to be achieved.

The LACAP Actions for Sustainability & Resource Management aim to *"Embed the principles of sustainability and the circular economy within all Council functions, empower citizens and business within the County to make informed sustainable, circular and climate positive choices."*, the objectives for which are as follows:

1. *Support renewable electricity generation, transmission and use within the County in line with national and regional policy including the Electricity Storage Policy Framework.*
2. *Support circular initiatives and infrastructure within the County including prevention, reuse, repair and recycling.*
3. *Increase collection of circular resources for renewable energy systems.*

Actions S2 and S4 of the Kildare LACAP position themselves in line with the KCDP and the climate action objectives of these plans:

- **S2:** Implement the Kildare County Council Wind Energy Strategy, whilst advocating and exerting influence to ensure such projects promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.
- **S4:** Support ongoing expansion and improvements to the electricity grid infrastructure within the County to support renewable generation and supply, having due regard to environmental sensitivities such as archaeology, European sites, biodiversity and amenity value, water and air quality.

Furthermore, CAP25 Actions for Natural Environment & Green Infrastructure set out an objective to *"Protect and restore peatlands"*, and Actions N16 and N17 have been incorporated into the LACAP in support of this objective:

- **N16:** Deliver the enhanced rehabilitation of former industrial peatlands within the County in line with Irelands National Recovery and Resilience Plan, whilst advocating and exerting influence to ensure such projects promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.
- **N17:** Engage with Bord na Móna to explore the appropriate and sensitive diversification of former cutaway peatlands and development of alternative uses such as rewetting and recreational facilities under the brown to green agenda under the National Strategy on Outdoor Recreation, whilst advocating and exerting influence to ensure such projects promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.

Kildare Wind Energy Strategy 2023-2029

The Wind Energy Strategy (Kildare WES), included as Appendix 2 within the KCDP, builds upon previous strategies and incorporates updated legislation and policies. The Kildare WES was prepared with the overall aim to facilitate the development of wind energy infrastructure to contribute towards International, European, National and Regional climate targets. The key objectives of the Kildare WES are as follows:

- Recognise the importance of wind energy as a renewable energy source and ensure the security of energy supply by supporting, in principle and at appropriate scales and locations, the development of wind energy resources in the county.
- Promote the development of wind energy and other renewable energy sources in the county at appropriate locations to meet national renewable energy targets.
- Enable Kildare to generate the equivalent of 70% of its electricity needs from renewable energy, of which wind energy is a contributor.
- Identify strategic areas in the county for potential wind energy development.
- Provide specific criteria for wind energy development that the planning authority will take into account when considering any wind energy or related proposals.
- Support the potential for relatively small-scale wind energy developments within urban and industrial areas, and for small community-based proposals outside the strategic areas.

The strategy employs a step-by-step sieve mapping analysis of the key environmental, landscape and technical criteria to identify suitable locations:

- Step 1: Examination of existing Wind Speeds.
- Step 2: Evaluation of the landscape and its sensitivity for wind energy developments.

- Step 3: Overlay of the Wind Energy Mapping with Landscape Evaluation and Sensitivity Analysis with information regarding built and natural heritage, archaeological and amenity designations in the Development Plan and existing settlements within the county.
- Step 4: Add information regarding accessibility to electricity transmission, distribution girds, aviation constraints and approved/proposed wind farm developments.

Based on the assessment, the Kildare WES identifies three strategic areas that relate to the acceptability of windfarm development:

1. *Acceptable in Principle*
2. *Open for Consideration*
3. *Not Normally Permissible*

The Proposed Wind Farm is located within an area designated '*Open for Consideration',* described as:

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

The Kildare WES identifies a county target of 280MW of onshore wind energy capacity by 2030. This is derived by applying the County's proportional share of National population of 4.7% and land area of 2.4%, averaged at 3.5% to the National onshore wind energy target of 8,000MW by 2030, as set by the Climate Action Plan 2021. This target is further validated through a sieve mapping exercise undertaken, which identifies approximately 100,000 hectares of land theoretically suitable for wind energy development. Applying the 3.5% target to this land area yields approximately 3,500 hectares of potential areas suitable for wind energy developments. At a standard rate of 12.5 hectares per megawatt[37], independently produces the figure of 280MW.

According to the Kildare WES, the time required to progress a wind farm from inception to completion means the county's full 280 MW wind energy potential is unlikely to be achieved within the lifetime of the current KCDP. Based on national climate targets, sieve mapping, and current permitted and proposed projects, the current KCDP is estimated to only deliver approx. 107 MW (38.21%) of wind energy of the 280MW potential. This target will be subject to change following the allocation of a MW target for each county under the updated RSES for the Eastern and Midland Region, as required under National Policy Objective 74 of the revised NPF.

The Proposed Variation No. 4 to the KCDP, adopted on 27th April 2026, replaces the Landscape Character Assessment (2004) with the Landscape Character Assessment (2025) carried out in response to Action LR A1 of KCDP. The Proposed Variation Amends Section 2.4.3 of the WES and sets out the updated Landscape Character Assessment which identifies four classes of sensitivity:

1. *High Sensitivity – The Curragh Plains.*
2. *Medium to High Sensitivity – The Bog of Allen and River Liffey Valley & Plains.*
3. *Medium Sensitivity – Carbury Boyne Lowlands, Barrow Grand Canal Corridor, The Six Hills, The Cill Dara Lowlands, the South Eastern Kildare Hills and the Naas and Liffey Foothills.*

[37] *This figure has been assumed by the Kildare WES based on recent experience in onshore wind farm design with the latest capacity and dimensions of modern turbines and applying a separation to avoid excess turbine wake interaction and loading. The value is in line with assumptions used by Carlow and Galway counties in their similar assessments.*

4. *Medium to Low Sensitivity – Slí Mhór Corridor.*

The Proposed Variation amends text and maps in Section 3.2.1 and 3.2.3 of the Kildare WES to reference the Landscape Character Assessment (2025) and identifies 10 Landscape Character Areas (LCAs) in the county. The variation replaces the Western Boglands with a reconfigured character area designated as the Bog of Allen (LCA4). The updated Landscape Character Assessment also revises the sensitivity classification for this area from 'Class 3 – High Sensitivity' to 'Medium to High Sensitivity', reflecting the landscape's post-industrial, modified condition resulting from extensive peat harvesting and associated land management activities, which have altered its character and reduced its sensitivity relative to more intact or naturalistic landscapes.

The Proposed Wind Farm remains designated as *'Zone 2 – Open for Consideration'* under the updated Kildare WES Map 12 associated with Proposed Variation No. 4, please see Figure 2-3 below.

Variation No. 4 has been considered in the Landscape and Visual Impact Assessment (LVIA) in Chapter 13 of this EIAR. The LVIA includes the assessment of the Bog of Allen LCA4 classification and associated 'Medium to High Sensitivity' rating. The LVIA in Chapter 13 determined that the Proposed Wind Farm is located within a landscape that can effectively accommodate a wind energy development of this scale.

As outlined in this EIAR and the accompanying Planning Report, the layout of the Proposed Project has been carefully developed in accordance with the opportunities and sensitivities identified in Map 10 of the Kildare WES, ensuring that the Project Site represents a suitable and appropriate location for a wind energy development and all ancillary infrastructure. In addition to the factors listed above, the Proposed Wind Farm is in close proximity to the existing energy transmission network and road network, requires minimal vegetation removal, has suitable wind speeds, and achieves the recommended setbacks in the WEDG 2006 and the Draft WEDG 2019. Further detail in relation to the site selection process is provided in Chapter 3 of this EIAR.

As such it is considered that the Proposed Project is in accordance with the aims and objectives of the Kildare WES and the Proposed Variation No. 4 and represents an opportunity to significantly increase the supply of renewable electricity to the national grid on a suitable site.

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732000 726000 720000

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R441 R402 R441 R441 R401 R401 R442 R414 R414 R415 R415

Club Carbury Coonagh Timahoe East Parsonstown (Carbury By) Derrinturn Ballyhagan Dreenan Edenderry Ticknevin Killinagh Lower Allenwood South Clonbullogue Ballyteige South Feighcullen Newtown (ed Killinthomas)

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

0 1.25 2.5 5 7.5 10 Kilometers

Legend

- Project Site

Proposed Turbine Layout

- 220
- 200

Kildare Wind Energy Strategy

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

Offaly Wind Energy Strategy

- Areas Not Deemed Suitable
- Areas Open for Consideration

Spatial Reference
Name: WGS 1984 Web Mercator Auxiliary Sphere
Datum: WGS 1984
Projection: Mercator Auxiliary Sphere

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SITE LOCATION - NOT TO SCALE

Drawing Title: County Offaly and Kildare Wind Energy Strategy area designations and Proposed Turbines

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

Project No.	Drawing No.	Scale
250708	2-3	1:90,424
Drawn By	Checked By	Date
LPM	EC	02/10/2026

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2.6.4.3 Compliance with Local Policy Objectives

In summary, the OCDP, KCDP, and associated WESs and LACAPs recognise the importance of tackling climate change through the increased supply of renewable energy. The CDPs outline both county's commitments to climate action and the need to meet national objectives regarding a reduction in GHG emissions. OCC and KCC seek to support and facilitate the sustainable provision of a reliable energy supply in the counties, with emphasis on increasing energy supplies derived from renewable resources and reducing dependency on fossil fuels. Furthermore, there is a range of policies in place which support the development of renewable energy.

The Proposed Wind Farm is located within an area designated in the OCDP as *'Open for Consideration'* and within an area designated in the KCDP as *'Open for Consideration'* for wind energy development. Accordingly, the Proposed Project is deemed to align with the relevant provisions of the OCDP and KCDP and constitutes proper planning and sustainable development within the functional areas of Offaly County Council and Kildare County Council.

2.6.5 Other Relevant Onshore Wind Energy Planning Policy Publications

The following relevant onshore wind planning policy publications and/or best practice guidelines were considered in the design and assessment of the Proposed Project.

Wind Energy Development Guidelines 2006

In June 2006, the then Department of Environment, Heritage and Local Government (DoEHLG) published the Wind Energy Development Guidelines (WEDG 2006) under Section 28 of the Planning Act. The aim of the WEDG 2006 was to assist the proper planning of wind power projects in appropriate locations around Ireland. The WEDG 2006 also highlight general considerations in the assessment of all planning applications for wind energy. They set out advice to planning authorities on planning for wind energy through the development plan process and in determining applications for planning permission. They contain guidelines to ensure consistency of approach throughout the country in the identification of suitable locations for wind energy development.

Each wind energy development has its own characteristics and defining features, and it is therefore impossible to write specifications for universal use. The WEDG 2006 should be applied practically and do not replace existing national energy, environmental and planning policy. While the WEDG 2006 remain the relevant guidelines in place, at the time of lodgement, decision makers (Planning Authorities and ACP) are not bound to their provisions, and they (and do) consider updated standards/requirements/specifications in assessing impacts and the proper planning and sustainable development of the area.

Draft Wind Energy Development Guidelines 2019

The Department of Housing, Planning and Local Government (DoHPLG) published the draft Revised Wind Energy Development Guidelines (Draft WEDG 2019) in December 2019. A consultation process in relation to the Draft WEDG 2019 concluded on the 19th of February 2020. A further review of the Draft WEDG 2019is currently underway by the Department of Housing, Local Government and Heritage (DoHLGH) and the DECC, particularly in relation to noise limits. Since the publication of the Draft WEDG 2019, there have been significant changes in national policy regarding renewable energy targets, giving further impetus to the importance of the further review. The Draft WEDG 2019 set out that that the proper planning and sustainable development of areas and regions must be considered when local authorities prepare their development plans and assess planning applications, irrespective of the significant role renewable energy must play in tackling climate change.

The Draft WEDG 2019 notes that potential impacts of wind energy development proposals on the landscape, including the natural and built environment, must be considered along with the legitimate concerns of local communities. With this in mind, and in line with the previously stated "preferred draft approach", the Draft WEDG 2019 primarily focus on addressing a number of key aspects including, but not limited to:

- Acceptable noise thresholds and monitoring frameworks;
- Visual amenity setback;
- Control of shadow flicker;
- Compliance with Community consultation and dividend requirements, as included within the obligatory Community Report; and
- Consideration of the siting, route and design of the proposed grid connection as part of the whole project.

The design of the Proposed Project has been developed in accordance with the provisions of the Draft WEDG 2019 (for example in relation to 4 times the turbine tip height setback distance from third-party sensitive receptors) and the inclusion of a standalone community report.

As stated above, the submission period for the Draft WEDG 2019 closed in February 2020. Under the consultation, concerns were raised in relation to a number of themes including but not limited to; noise, visual amenity, set back and shadow flicker. With regards to noise, a number of the received submissions noted that the provisions put forward in the Draft WEDG 2019 were unworkable and could impact the viability of the entire onshore wind sector. In relation to set back distances there was strong criticism with regards to this distance being measured to the curtilage of a property due to this measurement being ambiguous and difficult to implement. Furthermore, questions were raised surrounding the strict measures proposed for shadow flicker; the Draft WEDG 2019 put forward the provision that *'there will be no shadow flicker at any existing nearby dwelling or other relevant existing affected sensitive property'* which didn't allow time for the safe shutting down of turbines.

At time of writing the Draft WEDG 2019 are not yet finalised and have not been adopted. The relevant wind energy guidelines for the purposes of Section 28 of the Planning Act, as amended, remain the WEDG 2006. Notwithstanding this, however, due to the timelines associated with the planning process for renewable energy projects it is possible that an updated version of the Draft WEDG 2019 may be finalised during the consideration period for the current planning application for the Proposed Project. To this end, on the basis of the details available from the Draft WEDG 2019 it is anticipated that the Proposed Project will be capable of adhering to the relevant noise and shadow flicker standards. While the final guidelines have not yet been published, Shadow Flicker and Noise and are entirely controllable and are discussed further in Chapter 5: 'Population and Human Health' and Chapter 12: 'Noise and Vibration', respectively. In addition, the Proposed Project maintains a four times tip height set back distance (880m) between turbines and third-party sensitive receptors which is currently the recognised standard for visual amenity purposes, as outlined in the Draft WEDG 2019. Furthermore, comprehensive community consultation has also been undertaken (refer to Appendix 2-2 Community Engagement Report), and detail of the Proposed Project has been provided and assessed as part of this EIAR, forming an integral part of this planning application.

IWEA Best Practice Guidelines for the Irish Wind Energy Industry 2012

The Irish Wind Energy Association (IWEA) (now Wind Energy Ireland) published updated Wind Energy Best Practice Guidelines for the Irish Wind Industry in 2012. The guidelines aim to encourage and define best practice development in the wind energy industry, acting as a reference document and guide to the main issues relating to wind energy developments. The purpose of the guidelines is to encourage responsible and sensitive wind energy development, which takes into consideration the concerns of local communities, planners, and other interested groups. The guidelines outline the main aspects of wind energy development with emphasis on responsible and sustainable design and environmental practices, on aspects of development which affect external stakeholders, and on good

community engagement practices. In approaching the development of IWEA's guidelines the aim was to be complementary to the WEDG 2006.

IWEA Best Practice Principles in Community Engagement and Community Commitment 2013

IWEA extended its guidance with the publication of this Best Practice in Community Engagement and Commitment. IWEA and its members support the provision of financial contributions by wind farm operators to local communities and have sought to formulate best practice principles for the provision of a community commitment. The document sets out IWEA's best practice principles for delivering extended benefits to local communities for wind farm developments of 5 Megawatts (MW) or above. Best Practice Principles of community engagement when planning the engagement strategy and preparing associated literature are also outlined in the document. The aim of these guidelines is to ensure that the views of local communities are taken into account at all stages of a development and that local communities can share in the benefits.

DCCAE Code of Practice for Wind Energy Development Ireland – Guidelines for Community Engagement 2016

In December 2016, the (then) Department of Communications, Climate Action and Environment (DCCAE) issued a Code of Practice for wind energy development in relation to community engagement. The Code of Good Practice is intended to ensure that wind energy development in Ireland is undertaken in adherence with the best industry practices, and with the full engagement of local communities. Community engagement is required through the different stages of a project, from the initial scoping, feasibility and concept stages, right through construction to the operational phase. The methods of engagement should reflect the nature of the project and the potential level of impact that it could have on a community. The guidelines advise that ignoring or poorly managing community concerns can have long-term negative impacts on a community's economic, environmental or social situation. Not involving communities in the project development process has the potential to impose costly time and financial delays for projects or prevent the realisation of projects in their entirety.

Further details on the community engagement that has been undertaken as part of the Proposed Project are presented below. A Community Engagement Report has been prepared by BnM and is included as Appendix 2-2 to this chapter. This report outlines the steps taken by the Applicant to communicate effectively with the local community in respect of the Proposed Project.

Department Circular PL5/2017

On the 3rd of August 2017, the then Department of Housing, Planning and Local Government (DHPLG) issued Circular PL5/2017 to provide an update on the review of the wind energy and renewable policies in development plans, and the advice contained within a previous Departmental Circular PL20-13. Circular PL20-13 advised that local authorities should defer amending their existing Development Plan policies in relation to wind energy and renewable energy generally as part of either the normal cyclical six-yearly review or plan variation processes and should instead operate their existing development plan policies and objectives until the completion of a focused review of the WEDG 2006. The new circular (PL5/2017) reconfirms that this continues to be the advice of the Department.

The Circular also set out the four key aspects of a preferred draft approach being developed to address the key aspects of the review of the WEDG 2006 as follows:

- The application of a more stringent noise limit, consistent with World Health Organisation (WHO) noise standards, in tandem with a new robust noise monitoring regime, to ensure compliance with noise standards;

- A visual amenity setback of 4 times the turbine height between a wind turbine and the nearest residential property, subject to a mandatory minimum distance of 500 metres between a wind turbine and the nearest residential property;
- The elimination of shadow flicker; and
- The introduction of new obligations in relation to engagement with local communities by wind farm developers along with the provision of community benefit measures.

Commission for Regulation of Utilities: Grid Connection Policy

The Commission for Regulation of Utilities (CRU) (previously the Commission for Energy Regulation (CER)) launched a new grid connection policy in March 2018 for renewable and other generators, known as ECP-1, which seeks to allow "shovel ready" projects that already have a valid planning permission, connected to the electricity networks. The principal objective which guides this decision is to allow those projects to have an opportunity to connect to the network, along with laying the foundations for future, more regular batches for connection. August 2018 saw the applicants for new connection capacity under ECP-1 published. ECP-2 was launched in June of 2020, which set policy for at least three annual batches of connection offers (ECP 2.1, ECP-2.2, and ECP-2.3). On 4th April 2023 the CRU published its Decision on ECP-2.4, confirming a fourth batch under the ECP-2 policy. The first four ECP-2 application windows (2.1 -2.3 and -2.4) opened for the month of September each year. The application window for the fifth annual batch (ECP-2.5) closed on the 30th of November 2024. The enduring connection policy regime replaces the previous 'Gate' system of grid connection applications. The grid connection application window under ECP-1 was the first time since 2007 that certain renewable energy projects including wind farms had an opportunity to secure a new grid connection offer.

The design of the proposed underground electrical cabling for the Proposed Project has taken account of the *"preferred draft approach"* and accordingly, has been developed with the provisions of the Draft WEDG 2019 in mind. This grid connection policy will allow for the Proposed Project, once it is permitted, to connect to the electricity networks under the enduring connection policy regime.

Renewable Energy Support Scheme

The key measures set out in CAP25, such as the 9GW target from onshore wind, will be driven by introduction of the Renewable Electricity Support Scheme ('RESS') which aims to promote the generation of electricity from renewable sources.

The RESS is an auction-based scheme which invites renewable electricity projects to bid for capacity and receive a guaranteed price for the electricity they generate.

RESS 1 was the first Renewable Electricity Support Scheme run by the Government of Ireland and concluded in 2020. RESS 2 was run in 2022 and concluded in June 2022. The successful projects in RESS 2 represent a potential increase of nearly 20% in Ireland's current renewable energy generation capacity. They will be delivered between 2023 and 2025. A public consultation was opened in 2022 to refine the Terms and Conditions developed for RESS 2 with a limited and specific set of changes for RESS 3. This consultation closed in December 2022. RESS 3 auction was run in 2023 and concluded in September 2023. The RESS 4 auction concluded in August 2024, successfully procured approximately 2,071 GWh of renewable electricity, equivalent to around 1,300 MW of new capacity, largely from solar PV and onshore wind projects. The most recent RESS auction was the RESS 5 auction submissions closed in September 2025 with results announced later the same month. It secured its full target of around 1,500 GWh of renewable electricity, delivering over 1,000 MW of additional onshore wind and solar capacity.

The RESS ensures that Ireland is on a pathway to meet our ambitious climate targets and lays the foundations of a thriving and cost-effective renewable electricity market. This will support the growth of

the green economy, create sustainable work opportunities, and ultimately benefit the consumer as renewables become more cost effective and increase Ireland's energy security.

The Proposed Project is in accordance with the CAP25 and a grant of permission for the onshore wind energy development will contribute renewable energy generation in achieving Irelands CAP25 target of 9GW of onshore wind generation by 2030.

2.7 Planning History

This section of the EIAR sets out the relevant planning history of the Project Site and also identifies other wind energy developments within the wider area (25km from the Proposed Turbines).

2.7.1 Planning Applications within the Project Site

A planning search was carried out through the OCC and KCC online planning portals and ACP's online planning portal in September 2026 for relevant planning applications lodged within the planning application boundary (i.e., the Project Site) of the Proposed Project. The planning applications within the Project Site are provided in Table 2-2 below. In total, 10 planning applications were identified, 7 relating to the energy industry, 1 relating to public infrastructure, and 2 relating to extractive industry.

It is noted that part of the Project Site was subject to industrial scale peat extraction which was permanently ceased in June 2020; decommissioning activities as required by Condition 10 of the IPC Licence are currently ongoing.

Table 2-2: Planning applications within the Project Site

Planning Authority	Pl. Ref.	Description	Development Category	Planning Authority Decision	Note
Kildare County Council	2560302	for works associated with the proposed uprate of the existing 110 kV Overhead Line (OHL) between the existing Cushaling 110 kV substation in the townland of Ballykilleen, Co. Offaly and the existing Portlaoise 110 kV substation in the townlands of Clonminam and Kylekiproe, Co. Laois. The Cushaling – Portlaoise 110 kV OHL is approximately 41.6 km long and comprises 17 no. steel lattice tower structures and 193 no. wooden pole structures. The existing circuit is located across the functional areas of Offaly County Council (OCC), Kildare County Council (KCC) and Laois County Council (LCC). Approximately 10 km of the existing OHL circuit is located within the functional area of OCC, approximately 9 km is within the functional area of KCC and approximately 22.6 km is located within the functional area of LCC. Separate planning applications are being lodged with each respective County Council. The Proposed Development across the functional area of Co. Kildare is located in the townlands of Coolelan, Kiltaghan North, Kiltaghan South, Clonmoyle West, Ummeras More, Mountrice, Mullaghroe Upper, Mullaghroe Lower, Coolatogher, Coolsickin or Quinsborough and Coolnafearagh. The Proposed Development works across the functional area of Co. Kildare will comprise: 1. The replacement ("restringing") of the existing overhead line circuit conductor with a new higher capacity conductor including installation of a new fibre communication connection; 2. The replacement of 2 no. steel towers and their foundations; 3. The replacement of steel members at 1 no. tower; 4. Full tower painting required at 1 no. location; 5. Shear block remedial works (raise and cap) at 1 no. tower location; 6. The replacement of wooden poles only at 8 no. locations; 7. The replacement of wooden poles and crossarm at 3 no. locations; 8. The replacement of crossarm only at 4 no. locations; 9. The replacement of existing danger notices at various locations, as required; 10. The replacement of hardware and fittings, such as insulators, insulator hardware, earthwire hardware and anti-climbing guards at various locations, as required; 11. The replacement of suspension clamps, vibration dampers and compression assemblies at all locations, as required; 12. All associated temporary site development works to gain access to the existing structures including clearance of vegetation, disassembly and reassembly of gate posts/piers and removal and reinstatement of existing fencing; and 13. Other temporary associated and ancillary development works required for the purpose of the uprate of the existing circuit, including temporary items, such as: guard poles, construction compounds (located in the townland of Coolsickin or Quinsborough), clearance or management of vegetation, the installation of silt traps, silt fences, stone tracks, ground protection mats and watercourse crossings. No additional structures are proposed along the existing circuit. Any replacement structures will be constructed at, or immediately adjacent to, the existing structures	Energy Industry	Granted by KCC 02/09/2025	Application boundary shows a minor overlap with the Proposed Project; however, there is no overlap with any infrastructure associated with the Proposed Project.

		they will replace and will be of a generally similar height and appearance. An exception to this is structure 203, which will be relocated approximately 101m back towards structure 202 due to its existing position on top of a gravel mound and there being potential for subsidence of the gravel in the long term. No alteration to the nature, extent, alignment, character or voltage of the existing electricity infrastructure is proposed. A Natura Impact Statement (NIS) has been prepared in respect of the Proposed Development.			
Offaly County Council	19606 ACP Ref. 306924 20	A 10-year planning permission with a 30-year operational life for development on a site area of 60.674 hectares. The development will consist of up to 8 (eight) wind turbines with a tip height of up to 187 metres, and all associated foundations and hardstanding areas; approximately 4,750 metres of new internal access roads, associated drainage and turning areas; upgrade of approximately 3,500 metres of the existing l50062 public road including upgrade of the existing bridge; a new bridge crossing of the Figile river to provide access between turbine 3 and turbine 4; a 2,950-metre recreation trail and all associated development to include gravel pathways, a footbridge across the Figile river, a parking area, signage, information boards and outdoor fitness equipment; an off-site electrical substation and a battery energy storage facility; all associated underground electrical and communications cabling to connect the turbines to the substation including approximately 1,550m along the r401 regional road; a spoil storage area; a permanent meteorological mast up to 110.5 metres high; 2 no. Temporary construction compounds; 2 no. Temporary blade adapter set-down areas within the wind farm site and at the junction of the r402 and r401 at Rathmore, Edenderry, Co. Offaly; turbine delivery route works including widening of the junction of the r420 and r402 at Ballina, Geashill, Co. Offaly and all associated site development works. The overall development is for a nine (9) turbine wind farm, with a separate planning application being submitted to Kildare County Council for one (1) turbine located in the townland of Ticknevin, Carbury, Co. Kildare. An Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS) has been prepared in respect of the application.	Energy Industry	Granted by ACP 23/09/2020	Application boundary shows a minor overlap with the Proposed Project; however, there is no overlap with any infrastructure associated with the Proposed Project.
Offaly County Council	22494	The development of (a) approximately 970m of new internal access roads for the permitted Cushaling wind farm (planning ref. Pl2/ 19/606 and ABP 306924-20), (b) upgrade of approximately 560m of an existing Bord na Mona bog access road, (c) construction of a 1.6km double circuit 33kv underground collector cable from the permitted Cushaling wind farm to the permitted wind farm substation, (d) demolition and replacement of a Bord na Mona bogland access bridge and (e) relocation of the permitted Cushaling wind farm substation 25 meters southwest. A Natura Impact Statement (NIS) will be submitted to the planning authority with the application.	Energy Industry	Granted by OCC 28/03/2023	Application boundary shows a minor overlap with the Proposed Project; however, there is no overlap with any infrastructure

					associated with the Proposed Project.
Kildare County Council	191323 ACP Ref. 306748-20	The development of (a) approximately 970m of new internal access roads for the permitted Cushaling wind farm (planning ref. Pl2/ 19/606 and ABP 306924-20), (b) upgrade of approximately 560m of an existing bord na mona bog access road, (c) construction of a 1.6km double circuit 33kv underground collector cable from the permitted Cushaling wind farm to the permitted wind farm substation, (d) demolition and replacement of a bord na mona bogland access bridge and (e) relocation of the permitted Cushaling wind farm substation 25 meters southwest. A natura impact statement (nis) will be submitted to the planning authority with the application.	Energy Infrastructure	Granted by ACP 23/09/2020	Application boundary shows a minor overlap with the Proposed Project; however, there is no overlap with any infrastructure associated with the Proposed Project.
Kildare County Council	201142	A 10-year planning permission with a 30-year operational life for development on a site area of 3.23 hectares in the townland of Ticknevin, Carbury, Co. Kildare. The development will consist of up to 1 (one) wind turbine with a tip height of up to 187 metres, and all associated foundations and hardstanding areas, 20 metres of new wind farm road, and all associated underground electrical and communications cabling. This single turbine application forms part of a larger wind farm development located within County Offaly and Kildare with a separate planning application being submitted to Offaly County Council concurrently. The overall development will consist of up to 9 turbines (8 in Offaly and 1 in Kildare) with a tip height of up to 187 metres, and all associated foundations and hardstanding areas, approximately 4,750 metres of new internal access roads, associated drainage and turning areas; upgrade of approximately 3,500 metres of the existing L50062 public road including upgrade of the existing bridge; a new bridge crossing of the Figile River to provide access between Turbine 3 and Turbine 4; a 2,950-metre recreation trail and all associated development to include gravel pathways, a footbridge across the Figile River, a parking area, signage, information boards and outdoor fitness equipment; an off-site electrical substation and a battery energy storage facility; all associated underground electrical and communications cabling to connect the turbines to the substation including approximately 1,550 metres along the R401 Regional Road, a spoil storage area; a permanent meteorological mast up to 110.5 metres high; 2 No. temporary construction compounds; 2 No. temporary blade adapter set-down areas within the wind farm site and at the junction of the R402 and R401 at Rathmore, Edenderry, Co. Offaly; turbine delivery route works including widening of the junction of the R420 and R402 at Ballina, Geashill, Co. Offaly and all associated site development works. This application is accompanied by an Environmental Impact Assessment Report and a Natura Impact Statement.	Energy Infrastructure	Granted by KCC 13/07/2021	Application boundary shows a minor overlap with the Proposed Project; however, there is no overlap with any infrastructure associated with the Proposed Project.

ACP	323980	Proposed Water Supply Project for the Eastern and Midlands Region.	Public Infrastructure	Decision due 30/06/2026	-
ACP	306241	Application for leave to apply for substitute consent under section 177C of the Planning and Development Act 2000, (as amended) to regularise the planning status of Bord na Mona historic peat extraction (and ancillary works) on the milled peat production bogs. Allen Bog Group located in counties Offaly, Westmeath, Laois and Kildare.	Extractive Industry	Granted by ACP 01/05/2020	-
ACP	324604	Application under S.177E of the Planning and Development Act, 2000, as amended for the regularisation of peat extraction activities and ancillary activities. The application relates to development which is subject to an existing Integrated Pollution Control Licence (Ref. P0503-01) granted by the Environmental Protection Agency. The application is accompanied by a remedial Environmental Impact Assessment Report (rEIAR) and a remedial Natura Impact Statement (rNIS)	Extractive Industry	In Planning	An application for substitute consent was submitted to ACP on 20th August 2026, for peat extraction and ancillary works from July 1988 to the present day that have been carried out within part of the Project Site.
ACP	PA0047	Proposed Cloncreen Wind Farm comprising up to 21 no. Wind Turbines and all associated works.	Energy Industry	Granted by ACP 03/05/2017	-
ACP	324280	The proposed development of a new downstream underground high pressure gas pipeline, the provision of an offtake installation compound, and an above ground installation (AGI) compound and associated development, including associated access arrangements, landscaping and ancillary works	Energy Industry	In Planning	Application boundary shows a minor overlap with the Proposed Project; however, there is no overlap with any infrastructure associated with the Proposed Project.

2.7.2 Wind Farm Applications within 25km of the Proposed Turbines

A planning search was carried out to establish proposed, permitted and operational wind energy developments within 25km of the Proposed Turbines. The search was carried out using the relevant local authority and ACP databases in September 2026 for relevant planning applications.

The Wind Farm applications within 25km of the Proposed Turbines are provided in Table 2-3 below.

Table 2-3 Valid Wind Farm Applications within 25km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	Turbine No.	Approx. Distance to Nearest Turbine (km)
OCC Pl. Ref: 19/606 ACP Ref: PL. 19.306924 KCC Pl. Ref: 19/1323 ACP Ref: PL09.306748	Cushaling Wind Fam	County Offaly and Kildare	Cloncant Renewable Energy Limited	10-year planning permission with a 30-year operational life. The development will consist of up to 8 (eight) wind turbines. An Environmental Impact Assessment Report (EIAR) and A Natura Impact Statement (NIS) has been prepared in respect of the application	Granted by ACP - 23/09/2020	Existing	9	0.71 km
ACP Ref: PA19.PA0047	Cloncreen Wind Farm	County Offaly	Bord Na Mona Powergen Ltdv	Proposed Cloncreen Wind Farm comprising up to 21 no. Wind Turbines and all associated works	Granted by ACP - 03/05/2017	Existing	21	2.85 km
ACP Ref: PAX19.323579	Ballinla Wind Farm	County Offaly	Ballinla Wind Farm Limited	Proposed Windfarm development of 7 Turbines, 110kV substation and associated works.	Granted by ACP – 12/10/2026	Permitted	7	7.29 km
ACP Ref: PA09.322845, VA09.322843	Drehid Wind Farm	County Kildare	North Kildare Wind Farm Limited	Proposed development of 11 wind turbines and ancillary development.	Decision Due 16/03/2026	Proposed	11	7.44 km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	Turbine No.	Approx. Distance to Nearest Turbine (km)
ACP Ref: PAX09.324055	Derrynadarragh Wind Farm	County Kildare, Offaly and Laois	Dara Energy Limited	10-year permission for Derrynadarragh wind farm comprising of 9 no. wind turbines, onsite 110kV substation, turbine delivery route and a grid connection route.	Decision Due 03/02/2027	Proposed	9	7.66 km
ACP Ref: PC19.323296	Cushina Wind Farm	County Offaly	Cushina Wind Limited	Proposed development of 11 no. turbine wind farm.	-	Proposed	11	9.3 km
Pl. Ref: 09/453 ACP Ref: PL19.237263	Mountlucas Wind Farm	County Offaly	Bord Na Mona Energy Ltd.,	Development which will consist of a wind farm comprising: thirty-two turbines of up to 100m hub height and up to 112m rotor diameter with a total height not exceeding 156m; a transformer and crane hardstanding area at each turbine; underground electrical and communication cables linking the turbines; internal site tracks; a permanent meteorological lattice mast 100m high; a 110 kV substation and associated equipment and control building with associated septic tank and treatment system; extension to an existing borrow pit; drainage; and associated works. An environmental impact assessment accompanies this application. The proposed development is on a site that is the subject of an integrated pollution control licence (reg. No. 503) as issued by the EPA in accordance with the provisions of the Environmental Protection Agency Act 1992.	Granted by ACP - 07/12/2010	Existing	28	10.37 km
ACP Ref: PL19.PA0032, PM19.312876	Yellow River Wind Farm	County Offaly	Greenwind Energy	Wind farm of 32 no. turbines (96MW output) at Yellow River, north of Rhode, Co. Offaly.	Granted by ACP - 03/06/2014	Existing	29	12.11 km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	Turbine No.	Approx. Distance to Nearest Turbine (km)
Pl. Ref: 2560189	Clonarrow Wind Farm	County Offaly	Clonarrow Windfarm Limited	For the erection of 4 wind turbines. A 10-year planning permission and 35-year operational life from the date of commissioning of the entire wind farm is being sought. The planning application will be accompanied by an Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS). See full Development Description in attached document '7048 CWF - Development Description'.	Granted by OCC - 30/01/2026	Permitted	4	12.91 km
Pl. Ref:17/335, ACP Ref: 301619-18	Moanvane Wind Farm	County Offaly	Moanvane Wind Farm Ltd	Up to 12 no. Wind turbines with a tip height of up to 169 meters and all associated foundations and hardstanding areas; a recreational amenity trail, associated signage, parking and recreational facilities; 1 no. On-site electrical substation; 1 no. Temporary construction compound; all associated underground electrical and communications cabling connecting the turbines to the proposed on-site electrical substation; provision of new site access tracks and upgrading of existing access tracks and associate drainage; excavation of 1 no. Borrow pit; works to facilitate the delivery of turbines along the local road l1013 within the townland of Ballychristal to include temporary alterations to roadside boundary and the laying of temporary surfacing and the permanent setback of a roadside boundary wall; tree felling and all associated site development works. Permission is sought for a period of 10 years and an operational life of 30 years from the date of commissioning of the entire wind farm. An environmental impact assessment report (EIAR)/environmental impact statement (E.I.S) and a natura impact statement (NIS) have been prepared in respect of the proposed development.	Granted by ACP - 21/11/2018	Existing	12	13.87 km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	Turbine No.	Approx. Distance to Nearest Turbine (km)
ACP Ref: PC19.315157	Garryhinch Wind Farm	Co. Offaly and Laois	Bord na Móna Powergen Limited	Proposed development of Garryhinch Wind Farm consisting of between 10 and 14 wind turbines with power rating of between 5.0 MW to 7 MW.	Pre-App	Proposed	12	20.01 km
ACP Ref: PA25M.316212	Ballivor Wind Farm	Co. Meath and Westmeath	Bord na Móna Powergen LTD.	Proposed development of 26 no. wind turbines and associated works.	Granted by ACP - 22/11/2024	Permitted	26	21.30 km
Pl. Ref: 2078 ACP Ref: PL11.310312	Dernacart Wind Farm	County Laois	Statkraft Ireland Limited	construct up to 8 no. wind turbines with a tip height of up to 185 metres and all associated foundations and hardstanding areas; 1 no. on-site electrical substation; 1 no. temporary construction compound; all associated underground electrical and communications cabling connecting the turbines to the proposed on-site electrical substation; provision of new site access tracks and upgrading of existing access tracks and associated drainage; erection of 1 no. permanent meteorological mast of up to 110m in heights; works to facilitate the delivery of turbines adjacent to the N80 within the townlands of Dernacart and Forest Upper to include the laying of temporary surfacing; tree felling; and all associated site development works, ancillary works and equipment. Permission is sought for a period of 10 years and an operational life of 30 years from the date of commissioning of the entire wind farm. An Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS) have been prepared in respect of the proposed development.	Granted by ACP - 03/01/2024	Permitted	8	22.3 km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	Turbine No.	Approx. Distance to Nearest Turbine (km)
-	Kilberry Wind Farm	County Kildare	Pre-application	-	-	Public Domain	-	-

2.8 Scoping and Consultation

2.8.1 Scoping

Scoping is the process of determining the content, depth and extent of topics to be covered in the environmental information to be submitted to a competent authority for projects that are subject to an Environmental Impact Assessment (EIA). This process is conducted by contacting relevant authorities and Non-Governmental Organisations (NGOs) with interest in the specific aspects of the environment with the potential to be affected by the proposal. These organisations are invited to submit comments on the scope of the EIAR and the specific standards of information they require. Comprehensive and timely scoping helps ensure that the EIAR refers to all relevant aspects of the Proposed Project and its potential effects on the environment and provides initial feedback in the early stages of the EIAR preparation, when alterations are still easily incorporated into the design. In this way scoping not only informs the content and scope of the EIAR, but it also provides a feedback mechanism for the proposal design itself.

As part of the constraints mapping process, which is detailed in Section 3.2.5.3.1 of Chapter 3 of this EIAR, telecommunications operators were contacted by MKO in July 2020 (referred to below as the 'Telecoms Scoping Round 1 – 2020') and again by AI Bridges in May 2025 (referred to below as the 'Telecoms Scoping Round 2 – 2025') (see Appendix 2-1 and Appendix 15-8) in order to determine the presence of telecommunications links or aviation assets traversing or located in close proximity to the Proposed Project.

In May 2021 an EIAR scoping document, providing details of the Proposed Wind Farm, was prepared by MKO and circulated to statutory consultees. The scoping document provided details of the Proposed Project and set out the scope of work for the EIAR. Consultees were invited to contribute to the EIAR by suggesting baseline data, survey techniques and potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR. An updated EIAR scoping document was issued to consultees in December 2025 due to time elapsed from when previous scoping was carried out, updates in local and national policy and legislation, updates in relevant EIAR guidance, changes in the environmental baseline and refinement of the Proposed Project layout and design. These update and changes were reflected in the updated scoping document, and consultees were invited to contribute again to the EIAR.

2.8.2 Scoping Responses

The bodies engaged with at scoping stage are set out below in Table 2-4. Further to this, responses received from the scoping document circulated are set out in Table 2-5 below. Copies of all scoping responses received are included in Appendix 2-1 of this EIAR. If further responses are received, the comments of the consultees will be considered, where applicable, in the construction, operation and decommissioning of the Proposed Project in the event of a grant of planning permission. The recommendations of the consultees have informed the scope of the assessments undertaken and the contents of the EIAR.

Table 2-4 Scoping List and Responses

No.	Consultee	Date of Response -Scoping Round 1 -2021	Date of Response – Scoping Round 2 -2025
General Scoping			
1	AirNav	Consulted as part of Irish Aviation Authority in 2021 – response received from IAA on 10/03/2021	No Response Received

No.	Consultee	Date of Response -Scoping Round 1 -2021	Date of Response – Scoping Round 2 -2025
2	An Taisce	No Response Received	Acknowledgement Received 04/12/2025 and 14/04/2026 – no formal response received
3	The Arts Council	Not included in 2021 Scoping	No Response Received
4	An Garda Síochána (Tullamore)	Not included in 2021 Scoping	Response Received 14/04/2026
5	Broadcasting Authority of Ireland (BAI)	Response received 02/02/2021	Response Received from Coimisiún na Meán 13/01/2026
6	Bat Conservation Ireland	Response received 02/02/2021	No Response Received
7	BirdWatch Ireland	No Response Received	No Response Received
8	Butterfly Conservation Ireland	No Response Received	Response Received on 18/12/2025
9	Coillte	Not included in 2021 Scoping	Acknowledgement Received 11/03/2026 and 14/04/2026 - no formal response received
10	Commission for Communications Regulation	Not included in 2021 Scoping	Response Received 18/03/2026
11	Córas Iompair Éireann	Not included in 2021 Scoping	No Response Received
12	Commission for Regulation of Utilities Water and Energy	No Response Received	No Response Received
13	Department of Agriculture, Food and the Marine	Response received 08/03/2021	Response received 19/01/2026
14	Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media	Acknowledgement Received 16/06/2021 and 11/02/2021 Response received on 08/04/2021	Response received 14/04/2026
15	Department of the Environment, Climate and Communications (2021) Department of Climate, Energy and the Environment (2025)	No Response Received	Response Received from GSI, a section of DCEE 16/12/2025
16	Department of Defence	Response Received 01/03/2021	Response received on 30/12/2025. Meeting held on 19/05/2026. Please see Section 2.9.4 below for further details.

No.	Consultee	Date of Response -Scoping Round 1 -2021	Date of Response – Scoping Round 2 -2025
17	Department of Transport (2021) Department of Transport, Tourism and Sport (2025)	Response received 21/04/2021	Response received 08/01/2026
18	Department of Housing, Local Government and Heritage (includes National Parks & Wildlife Service, National Monuments Service)	Response received 08/04/2021	Initial response 04/12/2025 Formal response received 21/01/2026 Meeting held on 26/05/2026 w/ NPWS. Please see Section 2.9.4.3 below for further details.
19	Eastern and Midland Regional Assembly	No Response Received	No Response Received
20	Environmental Protection Agency	Response received 15/03/2021	Acknowledgement Received 05/12/2025 and 14/04/2026 – no formal response received
21	Ervia	Response Received 08/03/2021	Not included in 2025 Scoping
22	ESB	No Response Received	Acknowledgement Received 16/04/2026 – no formal response received
23	EirGrid	Not included in 2021 Scoping	Response received 04/12/2025 Meeting held on 16/12/2025 Please see Section 2.9.4.5 below for further details.
24	Fáilte Ireland	Response received 16/02/2021	Response received on 23/12/2025
25	Forest Service	Not included in 2021 Scoping	Acknowledgement Received 12/04/2025 and 13/01/2026– no formal response received
26	Geological Survey of Ireland	Response received 10/02/2021	Response received on 16/12/2025
27	Health Service Executive	Response Received 12/02/2021 and 22/03/2021	Response Received 29/01/2026
28	Inland Fisheries Ireland	Response received 10/03/2021	Initial response received 09/12/2026 and formal response 11/12/2025

No.	Consultee	Date of Response -Scoping Round 1 -2021	Date of Response – Scoping Round 2 -2025
29	Irish Aviation Authority	Response received 10/03/2021	Response Received 05/12/2025 asking for further detail – no response to further correspondence received
30	Irish Peatland Conservation Council	Response Received 18/01/2021	Initial response Received 13/01/2026 and formal response 26/01/2026
31	Irish Rail	Not included in 2021 Scoping	Response received 04/12/2025
32	Irish Red Grouse Association	No Response Received	No Response Received
33	Irish Raptor Study Group	No Response Received	No Response Received
34	Irish Wildlife Trust	No Response Received	No Response Received
35	Irish Parachute Club	Not included in 2021 Scoping	No Response Received
36	Kildare County Council Environment Department	Not included in 2021 Scoping	Acknowledgement email received 04/12/2025- no formal response
37	Kildare County Council Heritage Department	Not included in 2021 Scoping	No Response Received
38	Kildare County Council Roads Department	Not included in 2021 Scoping	Acknowledgement email received 14/04/2026- no formal response
39	Kildare County Council Planning Department	Not included in 2021 Scoping	Acknowledgement email received 04/12/2025- no formal response
40	Offaly County Council Planning Department	Response received 14/04/2021	No Response Received
41	Offaly County Council Roads Department / Edenderry Municipal District	Not included in 2021 Scoping	Response Received 05/12/2025
42	Offaly County Council Heritage Department	Not included in 2021 Scoping	No Response Received
43	Offaly County Council Environment Department	Not included in 2021 Scoping	No Response Received
44	Office of Public Works	No Response Received	Acknowledgement email received 04/12/2025 and formal response Received 23/03/2026
45	Sports Ireland	No Response Received	No Response Received
46	Sustainable Energy Authority of Ireland	No Response Received	No Response Received

No.	Consultee	Date of Response -Scoping Round 1 -2021	Date of Response – Scoping Round 2 -2025
47	The Heritage Council	No Response Received	No Response Received
48	Transport Infrastructure Ireland	Response Received 17/02/2021	Response Received 06/01/2026
49	Uisce Eireann (Formerly Irish Water)	No Response Received	Response Received n 21/04/2026
50	Westmeath County Council - Planning Department	No Response Received	Not included in 2025 Scoping
51	Waterways Ireland	Response Received 12/02/2021	Acknowledgement email received 04/12/2025

Table 2-5 Telecoms Scoping List and Responses

No.	Consultee	Date of Response -Telecoms Scoping Round 1 -2020	Date of Response - Telecoms Scoping Round 2 - 2025
Telecommunications Scoping			
1	2rn (RTE Transmission Network Ltd)	Not included in Telecoms Scoping Round 1 – 2020	06.05.2025
2	AirNav Ireland	Not included in Telecoms Scoping Round 1 – 2020	No Response Received
3	Airwave	Not included in Telecoms Scoping Round 1 – 2020	06.05.2025
4	An Garda Síochána	Not included in Telecoms Scoping Round 1 – 2020	No Response Received
6	Córas Iompair Éireann (CIE)	Not included in Telecoms Scoping Round 1 – 2020	02.05.2025
7	Coimisiún na Meán (formerly Broadcasting Authority of Ireland (BAI))	Not included in Telecoms Scoping Round 1 – 2020	02.06.2025
8	Department of Defence	Wasn't contacted with regards to telecoms as part of Telecoms Scoping Round 1 – 2020	19.05.2025
9	Eir	Received 14.07.2020 and 17.07.2020	02.05.2025
10	EMR Solutions	18.02.2021	Not included in Telecoms Scoping Round 2 -2025
11	Enet	14.07.2020	02.05.2025
12	ESB	20.11.2020 05.01.2021	28.08.2025
13	Imagine Broadband	14.07.2020	02.05.2025

14	Openeir	30.10.2020	Openeir links are managed directly through Eir
15	Ripplecom	15.07.2020	Ripplecom were not contacted as part of the Telecoms Scoping Round 2 - 2025 as they have been acquired by Viatel
16	Offaly County Council	Not included in Telecoms Scoping Round 1 – 2020	No Response Received
17	Tetra Ireland	Not included in Telecoms Scoping Round 1 – 2020	02.05.2025
18	Three Ireland	16/07/2020	06.05.2025
19	Uisce Éireann	Wasn't contacted with regards to telecoms as part of Telecoms Scoping Round 1 – 2020	07.05.2025
20	Viatel	16/07/2020	02.05.2025
21	Virgin Media	06/08/2020	13.05.2025
22	Vodafone	14/07/2021	02/05/2025

Table 2-6 Summary of General Scoping Responses received from Consultees

No.	Consultee	Date of Response	Response Summary - Scoping Round 1 -2021	Response Summary – Scoping Round 2 - 2025	Addressed in Chapter
General Scoping					
1	AirNav	› Scoping Round 1: 10/03/2021 › Scoping Round 2: No Response Received	'*The Irish Aviation Authority (IAA) Air Navigation Services Division (ANSD) does not get involved in the planning process.*' Structures within protected aerodrome airspace and any man-made object exceeding 45 m in height require notification at least 30 days in advance. For wind energy developments, detailed turbine and obstacle data (coordinates, heights, rotor dimensions, site extent, and aviation lighting specifications) must be provided to IAA ANSD. Electronic terrain and obstacle data (eTOD) surveyed by Ordnance Survey Ireland is also required, with costs borne by the developer.	N/A	Chapter 16: Aviation
2	Broadcasting Authority of Ireland (BAI)	› Scoping Round 1: 02/02/2021 › Scoping Round 2: 13/01/2026	'The BAI does not perform an in-depth analysis of the effect of wind turbines on FM networks. However, we are not aware of any issues from existing windfarms into existing FM networks. Also, the proposed	'Coimisiún na Meán does not perform an in-depth analysis of the effect of wind turbines or electrical sub stations on FM networks. However, we are not aware of any issues from existing windfarms or electrical sub stations into existing FM networks. Also, the proposed substation is	Chapter 15: Material Assets

No.	Consultee	Date of Response	Response Summary - Scoping Round 1 -2021	Response Summary – Scoping Round 2 - 2025	Addressed in Chapter
			windfarms are not located close to any existing or planned FM'	not located close to any existing or planned FM transmission sites.'	
3	Butterfly Conservation Ireland	› Scoping Round 1: No Response Received › Scoping Round 2: 18/12/2025	N/A	Attached a formal response outlining details of their knowledge of the Project Site. State that: '*The area holds at least 13 species and seven habitats listed in Annex II and Annex I of the Habitats'* *The region also holds 15 amber-listed birds of conservation concern, (19% of amber-listed species) and 11 Red-listed birds (20% of the red-listed bird species).* *The Lullymore/Lullybeg area ranks as one of Ireland's three important butterfly areas.*[38] *The region supports hundreds of moth species, including some rare and threatened macro-moths. The rare moth Suspected Parastichtis suspecta, declared Regionally Extinct (in Ireland) in 2016* [39] *was rediscovered in the region.*	Chapter 6: Biodiversity Chapter 7: Birds

[38] *Van Swaay, C.A.M., Warren, M. (2006).* Prime Butterfly Areas of Europe: an initial selection of priority sites for conservation. *Journal of Insect Conservation (2006) 10: 5–11 _ Springer 2006 DOI 10.1007/s10841-005-7548-1*
[39] *Ireland Red List No. 9 - Macro-moths (Lepidoptera)* https://biodiversityireland.ie/app/uploads/2021/04/RL9-Moths-final-version-010616.pdf

No.	Consultee	Date of Response	Response Summary - Scoping Round 1 -2021	Response Summary – Scoping Round 2 - 2025	Addressed in Chapter
				The region contains 26 of Ireland's 35 butterfly species, including four species ranked with a threat category under the IUCN criteria. [40] *Lullybeg is one of only five locations in the Republic of Ireland where 100 plus Marsh Fritillary adult butterflies have been recorded in one 10km square.* [41] *The region holds a number of colonies, operating within the landscape as a functioning metapopulation.*' BCI further outlines that they expect the assessments will be carried out in accordance with the EIA Directive. BCI suggest that a comprehensive examination of the Kildare County Development Plan 2023-2029 be undertaken to review the current proposal. BCI express concern over collision risk and request that the cumulative impacts of wind farms in Kildare and Offaly are considered.	

[40] *Regan, E.C., Nelson, B., Aldwell, B., Bertrand, C., Bond, K., Harding, J., Nash, D., Nixon, D., & Wilson, C.J. (2010) Ireland Red List No. 4 – Butterflies.* National Parks and Wildlife Service, *Department of the Environment, Heritage and Local Government, Ireland.*
[4141] *Cremin, R. (2025) Marsh Fritillary (*Euphydryas aurinia*). Pp. 92-93, In Harding & Lysaght (2025) An Atlas of Butterflies in Ireland 2010-2021. The National Biodiversity Data Centre Waterford.*

No.	Consultee	Date of Response	Response Summary - Scoping Round 1 -2021	Response Summary – Scoping Round 2 - 2025	Addressed in Chapter
4	Commission for Communications Regulation	› Scoping Round 1: Not Scoped With › Scoping Round 2: 18/03/2026	N/A	Provide link to publicly available datasets. Outlined that ComReg does not carry out any assessment of potential interference from wind energy developments and licensees should be contacted directly.	Chapter 15: Material Assets
5	Department of Agriculture, Food and the Marine	› Scoping Round 1: 08/03/2021 › Scoping Round 2: 19/01/2026	Response received noting the regulations around felling and requirements for a felling license.	Letter summarising requirement for felling licence if the Proposed Project involves felling/removal of trees.	Chapter 4: Description of the Proposed Project Chapter 6: Biodiversity
6	Department of Defence	› Scoping Round 1: No Response Received › Scoping Round 2: Response received on 30/12/2025. › Meeting held on 19/05/2026. › Please see Section 2.9.4.4 below for further details.	The DoD has raised concerns regarding the Proposed Project's location within military airspace (EI-R16 and MOA 4) and within the protected 20 NM zone of Casement Aerodrome. The Air Corps considers the development may adversely affect low-level flight training, military and civil aircraft navigation, instrument flight procedures, and operational safety. Concerns were also expressed regarding the cumulative impact of existing and proposed wind farms on navigability within the area.	The DoD noted that part of the Proposed Project lies within 20 NM of Casement Aerodrome and within the Edenderry/Allenwood/Rathangan (Lullymore) Air Corps Low Flying Training Area. Concerns were raised that wind turbines and other tall structures over 45 m could significantly impact Air Corps flight operations and low-flying training activities, with cumulative effects from renewable energy developments potentially affecting Air Corps operability. The Department also clarified that these observations are non-binding, do not constitute a planning position, and that further comments may be made at planning application stage.	Chapter 15: Material Assets Chapter 16: Aviation

No.	Consultee	Date of Response	Response Summary - Scoping Round 1 -2021	Response Summary – Scoping Round 2 - 2025	Addressed in Chapter
				Consultation held on 19/05/2026 – please see Section 2.9.4.4 below for further details.	
8	Department of Transport (2021) Department of Transport, Tourism and Sport (2025)	› Scoping Round 1: 21/04/2021 › Scoping Round 2: 08/01/2026	Asked that the EIAR considers the level of impact the proposed development may have on the public road network during both construction and longer term. Examine options other than installing cabling within public road network. Consider existing utilities within local roads. Consider short grid connection close to wind farm where possible. Liaise with Offaly County Council regarding the design and approach for grid connection.	The DoT emphasised that any proposed grid connection should demonstrate that the selected routing represents the optimal solution, consistent with Climate Action Plan 2024 objectives. Alternative technologies and route options, including overhead lines, underground cables, and connections closer to the wind farm, should be assessed through a robust multi-criteria analysis. Where high-voltage cables are proposed within the public road network, potential impacts on road operation, maintenance, future upgrades, drainage, and other utilities must be considered. Detailed consultation with the relevant road authorities and compliance with Department guidance and standards for road openings and cable installation are required.	Chapter 15: Material Assets
9	Department of Housing, Local Government and Heritage (includes National Parks & Wildlife Service,	› Scoping Round 1: 08/04/2021 › Scoping Round 2: Response received on 21/01/2026 › Meeting held on 26/05/2026 › Please see Section 2.9.4.3 below for further details.	The Department recommended a comprehensive ecological assessment, including review of NBDC species records, bat surveys (including a month-long detector deployment in August), invasive species assessment,	Attached a document outlining key notes in relation to the following: › Visibility analysis for vantage point surveys › Breeding Curlew surveys	Chapter 6: Biodiversity Chapter 7: Ornithology

No.	Consultee	Date of Response	Response Summary - Scoping Round 1 -2021	Response Summary – Scoping Round 2 - 2025	Addressed in Chapter
	National Monuments Service)		marsh fritillary surveys where suitable habitat exists, and consideration of wildlife impacts from construction and operational lighting. The Department also requested consideration of restoration requirements associated with IPC licences, assessment of interactions between amenity use and conservation interests, and identification of opportunities to enhance ecosystem services during the operational phase of the development.	› Contextualization of any impacts on breeding curlew › Breeding nightjar surveys › Potential for biodiversity enhancement measures within the application site Please see Section 2.9.4.3 below for further details on meeting held on 26/05/2026.	
10	Environmental Protection Agency	› Scoping Round 1: 15/03/2021 › Scoping Round 2: No Response Received	'*Having regard to the specific characteristics of the project, including location and technical capacity, and likely impact on the environment, the EPA recommended that the EIAR should:* *(i) identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of a project on each of the factors listed in Article 3 of the EIA Directive;*	N/A	All chapters

No.	Consultee	Date of Response	Response Summary - Scoping Round 1 -2021	Response Summary – Scoping Round 2 - 2025	Addressed in Chapter
			(ii) address the matters raised in the responses received from various consultees; *(iii) have regard to the rehabilitation plan(s) required under Condition 10 of Licence Reg No. P0500 for any bog areas relevant to the proposed development;* *(iv) have regard to the Guidelines on the information to be contained in Environmental Impact Statements, 2002, (and 2017 Draft Guidelines) as appropriate.* *(v) have regard to the relevant topics contained in the EPA's Advice Notes on Current Practice (in the preparation of Environmental Impact Statements) September 2003;* *(vi) satisfy the requirements of the EIA Directive.'*		
11	ESB	› Scoping Round 1: Not included as part of general scoping. Contacted as part of telecommunications scoping and detailed in Table in 2-7 below.	N/A	Response outlines that email has been forwarded on to the relevant team, and they will respond in due course. No response after follow-up.	Chapter 15: Material Assets

No.	Consultee	Date of Response	Response Summary - Scoping Round 1 -2021	Response Summary – Scoping Round 2 - 2025	Addressed in Chapter
		› Scoping Round 2: Response Received on 16/04/2026			
12	EirGrid	› Scoping Round 1: Not Scoped With › Scoping Round 2: Response received 04/12/2025 › Meeting held on 16/12/2025 › Please see Section 2.9.4.5 below for further details.	N/A	EirGrid noted that it has agreed an Engagement Protocol for underground electricity cables (UGC) within public roads for EirGrid projects. While the protocol is not specifically applicable to third-party developments, road authorities may refer to it during consultation. EirGrid indicated that future guidance may be updated as a result of national infrastructure initiatives and that it is unlikely to provide further comments on the proposal. Consultation held on 16/12/2025 – please see Section 2.9.4.5 below for further details	Chapter 15: Material Assets
13	Fáilte Ireland	› Scoping Round 1: 16/02/2021 › Scoping Round 2: 23/12/2025	Issued a copy of Failte Ireland EIAR Guidelines	Issued a copy of Failte Ireland EIAR Guidelines	Chapter 5: Population and Human Health
15	Geological Survey of Ireland	› Scoping Round 1: 10/02/2021 › Scoping Round 2: 16/12/2025	*GSI provided a response document mentioning comments regarding:* › *Geoheritage;* › *Groundwater;* › *Geological Mapping;* › *Geohazards;*	Provided a link to a list of publicly available datasets which are recommended to be used when conducting EIAR, SEA, planning and scoping processes.	Chapter 8: Land Soils and Geology Chapter 9: Water Chapter 11: Climate

No.	Consultee	Date of Response	Response Summary - Scoping Round 1 -2021	Response Summary – Scoping Round 2 - 2025	Addressed in Chapter
			› *Natural Resources (Minerals/Aggregates); and* › *Geotechnical Database Resources*	Detailed specific data for Environmental Assessment and Planning topics under the following headings: › Land and soils › Water › Climate Change › Cultural Heritage › Material Assets › The Landscape and › Other Relevant Data GSI requested that should the development go ahead, a copy of reports detailing site investigations would be appreciated.	Chapter 13: Landscape and Visual Chapter 14: Cultural Heritage Chapter 15: Material Assets
16	Inland Fisheries Ireland	› Scoping Round 1: 10/03/2021 › Scoping Round 2: 08/12/2025	*'IFI Outlined a number of concerns relating to water quality and habitat/hydro-morphological issues that persist throughout the Figile and Slate River systems linked to peat extraction and the potential that this Proposed Project may consolidate these serious issues.*	*'The site of this significant proposed development is located primarily within the upper reaches of the Figile River system with smaller sections located within the Slate catchment.* *The Figile and Slate River are two of the four Barrow tributaries (Figile, Cushina, Philipstown/Daingean & Slate), draining large peatland areas in the Bog of Allen which combined are known as the Black River system.* *IFI believe that the restoration of salmon spawning recruitment throughout the*	Chapter 6: Biodiversity Chapter 9: Water

No.	Consultee	Date of Response	Response Summary - Scoping Round 1 -2021	Response Summary – Scoping Round 2 - 2025	Addressed in Chapter
				Black River is integral to improving salmon stocks in the Barrow SAC. *IFI have recorded salmon spawning at several locations along the Cushaling River within the area covered by this EIAR scoping.* *In addition to salmon spawning being recorded over long sections of the Cushaling, checks throughout the Crabapple River system have highlighted excellent salmonid habitat on sections of channel there, specifically the Lugherra tributary where habitat restoration has occurred naturally.* *Checks by IFI throughout this study have highlighted significant loss of fisheries habitat linked to the previous land use here, where long sections were subject to hydro-morphological damage because of over-deepening and over-widening.* *IFI inspections have noted significant fisheries habitat loss within the study area on the Crabapple River system where all flows from the upper reaches of the Crabapple River were diverted across Lullybeg bog to the lower reaches of the Lugherra river.* *IFI welcome the Bord na Mona, Biodiversity Action Plan 2016-2021 statement that "the main aim of*	

No.	Consultee	Date of Response	Response Summary - Scoping Round 1 -2021	Response Summary – Scoping Round 2 - 2025	Addressed in Chapter
				rehabilitation will be to re-wet former production areas as much as possible to maximize the benefits for biodiversity and carbon". *Given the scale of this project there is a unique opportunity to showcase multiple river and terrestrial habitat restoration techniques focusing upon the watercourses within the study area and to make this restoration a central pillar of the project'*	
17	Irish Aviation Authority	› Scoping Round 1: 10/03/2021 › Scoping Round 2: 05/12/2026	*'IAA provided generic recommendations relating to the construction of the windfarm. Namely, the need for an aeronautical obstacle warning light scheme, 30 days notification in relation to crane operations and submission of as constructed coordinates, with ground and tip height elevations of each turbine.'*	Outlined proximity to the Irish Parachute Club and requested scoping be carried out with the Irish Parachute Club accordingly.	Chapter 16: Aviation
18	Irish Peatland Conservation Council	› Scoping Round 1: 18/01/2021 › Scoping Round 2: 26/01/2026	IPCC highlighted the ecological significance of the Lullymore Bog Complex and surrounding peatland habitats, emphasising the need to protect and restore raised bog remnants, wetlands, nature reserves and designated conservation sites. Concerns were raised regarding potential impacts	Detailed specific data based on their expertise in the area on the following: › Lodge Bog Nature Reserve › Lullymore West Nature Reserve › Lullybeg Nature Reserve › Lodge Bog Wetlands › Lullymore Wetlands › Ballysooghan North	Chapter 6: Biodiversity

No.	Consultee	Date of Response	Response Summary - Scoping Round 1 -2021	Response Summary – Scoping Round 2 - 2025	Addressed in Chapter
			of the proposed wind farm on sensitive habitats, peatland restoration initiatives, protected and declining species (including Curlew, Lapwing, Marsh Fritillary and Large Heath Butterfly), ecological connectivity, tourism and educational amenities. IPCC recommended exclusion zones and appropriate setback distances around key conservation sites, together with detailed ecological, hydrological and biodiversity assessments. While not opposed to renewable energy development in principle, IPCC stressed that project design should avoid adverse impacts on peatland restoration, biodiversity conservation and local amenity value.	› Aghameelick › The Long Derries SAC › Mouds Bog SAC › Pollardstown Fen SAC › Umeras Peatland › Bord na Mona Biodiversity Action Plan 2016-2021 › Habitats of Importance › Wetland Surveys Ireland › R414 Regional Road › Curlew Conservation › County Kildare Development Plan › Drainage › Peat Depth › Peatlands and Climate Action Scheme › Fragmentation › The Peatlands of County Kildare	
19	Irish Rail	› Scoping Round 1: Not Scoped With › Scoping Round 2: 04/12/2025	N/A	No concerns/feedback in relation to the Proposed Project	Chapter 15: Material Assets
20	Offaly County Council Planning Department	› Scoping Round 1: 14/04/2021 › Scoping Round 2: No Response Received	Identified that OCC will not be providing any response to the informal scoping document as they do not have resources.	N/A	Chapter 2: Background to the Proposed Project

No.	Consultee	Date of Response	Response Summary - Scoping Round 1 -2021	Response Summary – Scoping Round 2 - 2025	Addressed in Chapter
21	Office of Public Works	› Scoping Round 1: No Response Received › Scoping Round 2: 23/03/2026	N/A	Provided detail on drainage district channels and outlined point of contact if there is any interaction.	Chapter 9: Water
22	Transport Infrastructure Ireland	› Scoping Round 1: 17/02/2021 › Scoping Round 2: 06/01/2026	Outlined general requirements for EIA in relation to traffic and transport.	Notes that EIAR preparation should acknowledge official policy concerning access to national roads, outlined in the DoECLG 'Spatial Planning and National Roads Guidelines for Planning Authorities' (2012). Furthermore, Government policy seeks to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses (i.e. non-public road access) to national roads, to which speed limits greater than 50 kph apply. TII further provided a list of points to be addressed within the EIAR and relevant TII guidance to be utilised	Chapter 15: Material Assets
23	Uisce Eireann (Formerly Irish Water)	› Scoping Round 1: No Response Received › Scoping Round 2: 21/04/2026	N/A	Detailed data on the Uisce Éireann water network shared	Chapter 4: Description of the Proposed Project Chapter 9: Water

Table 2-7 Summary of Telecommunications Scoping responses received from Consultees

No.	Consultee	Date of Response	Response Summary – Telecoms Scoping Round 1 -2020	Response Summary – Telecoms Scoping Round 2 -2025	Addressed in Chapter
Telecommunications Scoping					
	2rn (RTE Transmission Network Ltd)	› Not included in Telecoms Scoping Round 1 › Telecom Scoping Round 2 – 06/05/2025	N/A	Yes, requests that a protocol agreement be put in place	Chapter 15: Material Assets
	Airwave	› Not included in Telecoms Scoping Round 1 › Telecom Scoping Round 2 – 06/05/2025	N/A	No impacts to the Airwave network identified	Chapter 15: Material Assets
	Córas Iompair Éireann (CIE)	› Not included in Telecoms Scoping Round 1 › Telecom Scoping Round 2 – 02/05/2025	N/A	Identifies that the Proposed Project lies within the GSM-R (mobile Network for Railways) coordination zone	Chapter 15: Material Assets
	Coimisiún na Meán (formerly Broadcasting Authority of Ireland (BAI))	› Not included in Telecoms Scoping Round 1 › Telecom Scoping Round 2 – 02/06/2025	N/A	Coimisiún na Meán note that they do not perform an in-depth analysis of the effect of wind turbines or electrical sub stations on FM networks and also note that they are not aware of any issues from existing windfarms or electrical sub stations into existing FM networks. Also, the proposed substation is not located close to any existing or planned FM transmission sites.	Chapter 15: Material Assets
	Department of Defence	› Wasn't contacted with regards to telecoms as part of Telecoms Scoping Round 1 – 2020	N/A	The DoD didn't note any issues regarding transmission links however the DoD made a number of observations regarding	Chapter 16: Aviation

		› Telecom Scoping Round 2 – 19/05/2025		aviation lighting which are summarised below and further detailed in Chapter 16 Aviation: *"All turbines should be illuminated by Type C, Medium intensity, Fixed Red obstacle lighting with a minimum output of 2,000 candela to be visible in all directions of azimuth and to be operational H24/7 days a week. Obstacle lighting should be incandescent or, if LED or other types are used, of a type visible to Night Vision equipment. Obstacle lighting used must emit light at the near Infra-Red (IR) range of the electromagnetic spectrum, specifically at or near 850 nanometres (nm) of wavelength. Light intensity to be of similar value to that emitted in the visible spectrum of light".* In response to the lighting requirements requested by the DoD, the Proposed Turbines will be included on mapping, fitted with obstruction lighting and entered into aircraft navigation databases to ensure they will be avoided during flight.	

				A dedicated meeting was held with the DoD on 19th May 2026 with the Applicant, members of the Project Team, the DoD, and a representative from the Irish Air Corp in attendance. This meeting focused on potential impacts to aviation and is detailed further in Section 16.4.2 of Chapter 16 Aviation.	
	Eir	› Telecom Scoping Round 1: 14/07/2020 › Telecoms Scoping Round 2: 02/05/2025	Identified 1 no. link with potential to be affected and required 100m buffer.	Identified 5 no. links with potential to be affected.	Chapter 15: Material Assets
	EMR Solutions	› Telecom Scoping Round 1: 18.02.2021 › Not included in Telecoms Scoping Round 2	No identified impact	N/A	Chapter 15: Material Assets
	Enet	› Telecom Scoping Round 1: 14/07/2020 › Telecoms Scoping Round 2: 02/05/2025	Identified 1 no. link with potential to be affected and required 100m buffer. Enet also noted they intend to build more links in this area later this year and to contact them again	Identified 1 no. link with potential to be affected and required 50m buffer	Chapter 15: Material Assets
	ESB	› Telecom Scoping Round 1: 20/11/2020 and 05/01/2021 › Telecoms Scoping Round 2: 28/08/2025	Identified 3 no. links with potential to be affected and noted separate required buffers from each link	Identified an exclusion zone in which if any turbines site within will require further detailed coordination	Chapter 15: Material Assets

	Imagine Broadband	› Telecom Scoping Round 1: 14/07/2020 › Telecoms Scoping Round 2: 02/05/2025	No identified impact	No identified impact	Chapter 15: Material Assets
	Openeir	› Telecom Scoping Round 1: 30.10.2020 › Telecoms Scoping Round 2: Openeir links are managed directly through Eir	Identified 3 no. link with potential to be affected and required 100m buffer.	N/A	Chapter 15: Material Assets
	Ripplecom	› Telecom Scoping Round 1: 15.07.2020 › Telecoms Scoping Round 2: Ripplecom were not contacted as part of the Telecoms Scoping Round 2 - 2025 as they have been acquired by Viatel	Identified 1 no. link with potential to be affected and required 20m buffer.	N/A	Chapter 15: Material Assets
	Tetra Ireland	› Not included in Telecoms Scoping Round 1 › Telecoms Scoping Round 2: 02.05.2025	N/A	No identified impact	Chapter 15: Material Assets
	Three Ireland	› Telecom Scoping Round 1: 16/07/2020 › Telecoms Scoping Round 2: 06/05/2025	Identified 3 no. links with potential to be affected and required 100m buffer.	Identified 4 no. links with potential to be affected and required 100m buffer.	Chapter 15: Material Assets
	Uisce Éireann	› Not included in Telecoms Scoping Round 1	N/A	Note they can confirm that there are no UÉ communication links traversing the Proposed Wind Farm.	Chapter 15: Material Assets

		› Telecoms Scoping Round 2: 07.05.2025			
	Viatel	› Telecom Scoping Round 1: 16/07/2020 › Telecoms Scoping Round 2: 02/05/2025	Note no impact	Note no impact	Chapter 15: Material Assets
	Virgin Media	› Telecom Scoping Round 1: 06/08/2020 › Telecoms Scoping Round 2: 13/05/2025	Note no impacts	Identified 8 no. links with potential to be affected	Chapter 15: Material Assets
	Vodafone	› Telecom Scoping Round 1: 14/07/2021 › Telecoms Scoping Round 2: 02/05/2025	Identified 2 no. links with potential to be affected and required buffer that ensures a minimum exclusion zone of +30m from the 1st Fresnel zone.	Identified 6 no. links with potential to be affected	Chapter 15: Material Assets

2.9 Pre-Planning Consultations

2.9.1 Offaly County Council

First Pre-Application Meeting (Section 247)

Members of the project team and the Applicant met with representatives from OCC in accordance with Section 247 of the Planning Act via Microsoft (MS) Teams on 01st April 2021. Those in attendance were:

On behalf of OCC:

- Carroll Melia (OCC)
- John McNally (OCC)
- M Duffy (OCC)
- Andrew Murray (OCC)
- Hugh McConnell (OCC)

On behalf of Applicant and Agent:

- Paddy Rowland (BnM)
- Caitríona Carter (BnM)
- Muriel Ennis (BnM)
- Jimmy Green (MKO)
- Karen Mulryan (MKO ENV)
- Paul Sweeney (MKO PLN)

The project team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- A high-level overview of the Proposed Project and the subject site.
- An introduction to the Applicant.
- Overview of relevant planning policy including compliance with local wind energy policy.
- Provided specific details of the scheme relating to LVIA and Ecology.
- Discussed scoping and pre-application/public consultation undertaken to date.
- Set out the scope of the Environmental Impact Assessment Report to be undertaken.
- Set out the projected project timelines.
- Discussed the relevant Strategic Infrastructure Development in the context of the current proposal.

Following this presentation, there was further discussion held between the project team and the representatives of OCC at this meeting. Matters discussed included:

- Photomontage locations to be used.
- Welcomed potential amenity links and noted its importance.
- Noted the scale and cumulative impact the development might have on the landscape.
- Noise, ecology and other assessments to be robust.
- Confirmed consultations with Irish Aviation Authority (IAA) and Department of Defence (DoD).
- Continued engagement with OCC recommended.
- Discussed possibility of battery storage being included within the application.

- Discussion on grid connection.
- Discussion on availability of the layout and further engagement regarding the same.
- Turbine delivery route assessment and impact from accommodating works to be carried out.

Second Pre-Application Meeting (Section 247)

Members of the project team and the Applicant met with representatives from OCC in accordance with Section 247 of the Planning Act via MS Teams on 22nd July 2026. Those in attendance were:

On behalf of OCC:

- Enda Oliver Finlay (OCC)
- Peter Egan (OCC)
- Enda Daily (OCC)
- Deirdre McGrath (OCC)

On behalf of Applicant and Agent:

- Julie Larkin (BnM)
- Muriel Ennis (BnM)
- Ellen Hillard (BnM)
- Jerry Brennan (BnM)
- Ronan Dunne (MKO PLN)
- Shikha Gajula (MKO PLN)
- Ellen Costello (MKO ENV)
- Catherine Johnson (MKO ENV)
- Alan Lipscombe (Alan Lipscombe Traffic and Transport Consultants Ltd.)

The project team gave an overview of the Proposed Project and an update in relation to Traffic and Transport aspects of the Proposed Project following on from consultation with the OCC Roads Department as outlined in Section 2.9.4.1 below, in the form of a PowerPoint presentation which set out the following information:

- A high-level overview of the Proposed Project and the subject site including site location, site selection process, constraint assessment, proposed project details, transport delivery route, turbine accommodation areas, and proposed construction haul routes.
- Overview of the traffic assessment undertaken, including the proposed site entrances, the design of Site Entrance 1A, Site Entrance 4F, and Site Entrances 4G and 4H, as well as the associated link and junction capacity assessments.
- Overview of IPC licence and relevant planning policy including national and regional planning context, the local policy context, local wind energy zoning, and the landscape and visual assessment.
- Set out the approach to the EIA and provided an overview of the designated sites assessment.
- Update on the EIA scoping and pre-planning consultation process, community and stakeholder engagement activities, and concluded with an overview of the Proposed Project timeline.

Following this presentation, there was further discussion held between the project team and the representatives of OCC at this meeting. Matters discussed included:

- Impact of construction traffic on structural condition of existing roads network.

- Detailed Traffic Management Plan (TMP) would include pre- and post-construction surveys, ongoing monitoring, temporary repairs, and road reinstatement measures, with these commitments incorporated into the CEMP.
- TMP and CEMP to be agreed with OCC and KCC ahead of construction.
- Feedback received on the proposed relocation of a directional road sign affected by the access junction to inform discussions with the auditors. Potential being to install a replacement sign approximately 200 m along the L5006, subject to agreement on site.
- Need for a detailed cumulative impact assessment and robust LVIA highlighted, given the scale of the proposed development.
- Consideration of aviation safeguarding requirements.
- Water Framework Directive (WFD) and Flood Risk Assessment queried, given the presence of rivers, streams and drains within the bog environment. Confirmed that the WFD Assessment, Flood Risk Assessment, NIS and CEMP will form part of the planning documentation.
- Planning Statement to include an assessment against OCDP Development Management Standard 109 relating to wind farms.
- Emphasis on using best available turbine technology and appropriate setbacks from dwellings in relation to noise impacts.
- Discussion on public consultation undertaken in May 2026 and the response being generally positive, with feedback received and addressed through the assessments and mitigation measures.
- Queried the proposed construction programme. Construction timelines are within the EIAR, it is anticipated to commence construction in 2030, with an estimated 3-year construction period.
- Queried the appropriate contact regarding Ballinagar Park for TDR works. Advised that the Edenderry Office should be contacted.

2.9.2 Kildare County Council

First Pre-Application Meeting (Section 247)

Members of the project team and the Applicant met with representatives from KCC in accordance with Section 247 of the Planning Act via MS Teams on 13th April 2021. Those in attendance were:

On behalf of KCC:

- Gary Farrelly (KCC)
- Eoghan Lynch (KCC)
- Colm Lynch (KCC)
- Colm Flynn (KCC)
- Deborah Crummy (KCC)
- Helen Behan (KCC)
- Jane O'Reilly (KCC)

On behalf of Applicant and Agent:

- Paddy Rowland (BnM)
- Caitríona Carter (BnM)
- Muriel Ennis (BnM)
- Jimmy Green (MKO)
- Karen Mulryan (MKO ENV)
- Paul Sweeney (MKO PLN)

The project team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- A high-level overview of the Proposed Project and the subject site.
- An introduction to the Applicant.
- Overview of relevant planning policy including compliance with local wind energy policy.
- Provided specific details of the scheme relating to LVIA and Ecology.
- Discussed scoping and pre-application/public consultation undertaken to date.
- Set out the scope of the Environmental Impact Assessment Report to be undertaken.
- Set out the projected project timelines.
- Discussed the relevant Strategic Infrastructure Development in the context of the current proposal.

Following this presentation, there was further discussion held between the project team and the representatives of KCC at this meeting. Matters discussed included:

- Discussion on haul routes and quantity of material to be brought to site.
- Suitability of roads to be considered within EIAR.
- Point of contact to discuss traffic impact assessment.
- Locations of quarries, quantity of aggregate needed, and routes proposed from quarries to site to be provided. Traffic impact assessment to cover the same.
- Surface Water Management Plan for construction phase required.
- Noise impact and comprehensive hydrology assessment to be undertaken.
- Strategic location of development in terms of amenity agreed on. Welcomed a comprehensive amenity proposal for the area.
- Decommissioning detail discussed.
- Rewetting of bogs to be considered.
- Consultation with Water Supply Project team recommended.
- LVIA impacts to be considered.
- Consultation with Irish Water recommended.

Second Pre-Application Meeting (Section 247)

Members of the project team and the Applicant met with representatives from KCC in accordance with Section 247 of the Planning Act via MS Teams on 16th September 2026. Those in attendance were:

On behalf of KCC:

- Mary JG O'Connor (KCC)
- Jenny Donovan (KCC)
- Sylvia Martin (KCC)
- Senan Costigan (KCC)
- Louise Murphy (KCC)
- Annette Keaveney (KCC)
- Colm Lynch (KCC)
- Carroll Melia (KCC)
- Patricia Hyland (KCC)

On behalf of Applicant and Agent:

- Julie Larkin (BnM)
- Muriel Ennis (BnM)
- Ellen Hilliard (BnM)
- Anna Perdue (BnM)
- Ronan Dunne (MKO PLN)
- Shikha Gajula (MKO PLN)
- Ellen Costello (MKO ENV)

- Catherine Johnson (MKO ENV)
- Lakshmi Priya Mohan (MKO ENV)

The project team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- A high-level overview of the Proposed Project and the subject site including site location, site selection process, constraint assessment, proposed project details, transport delivery route, turbine accommodation areas, and proposed construction haul routes.
- Overview of IPC licence and relevant planning policy including national and regional planning context, the local policy context, local wind energy zoning, and the landscape and visual assessment.
- Set out the approach to the EIA and provided an overview of the designated sites assessment.
- Update on the EIA scoping and pre-planning consultation process, community and stakeholder engagement activities, and concluded with an overview of the Proposed Project timeline.

Following this presentation, there was further discussion held between the project team and the representatives of KCC at this meeting. Matters discussed included:

- Alignment with planning, climate and biodiversity objectives.
- Need for carbon balance and carbon budget following peatland restoration, including anticipated restoration timescales, with regard to the National Peatlands Strategy and the 4th National Biodiversity Action Plan.
- Potential impacts on the Lullybeg Butterfly Conservation site in proximity to a proposed turbine and consultation with Butterfly Conservation Ireland (BCI).
- Consideration of the new Nature Restoration Law given the area's ecological sensitivity.
- Integration of biodiversity gain or management with the Proposed Project.
- Nature restoration at Ballynafagh Bog SAC. Detailed design and mitigation measures for potential effects of the grid connection. Works in this area confirmed to be within the public road corridor and subject to a road opening licence
- Discussion on watercourse buffers and potential impacts on the River Slate and its tributaries.
- Discussion on peat and soil management. Recommended that the Surface Water Management Plan (SWMP) take account of the mitigation measures during construction phase of the tributaries of the rivers within the site.
- Construction noise and dust constraints and mitigation measures discussed.
- Discussion on cumulative impact assessment.
- Requested that the public notices, development description and drawings clearly distinguish between the County Kildare and County Offaly elements.
- LVIA impacts to be considered including local receptors and open landscapes.
- Consideration of the Kildare Biodiversity Action Plan, Objective 1.6 and its relevance to the proposed National Peatlands Park.
- Discussion on the amenity proposals.
- Discussion on roads and traffic.

2.9.3 An Coimisiún Pleanála

Section 37B Consultation

The Applicant engaged with ACP, under the provisions of Section 37B of the Planning Act, as to whether the Proposed Project would meet the thresholds of the Seventh Schedule of the Planning Act. The applicant opened consultations with the Commission in September 2021 in relation to a Proposed Project of 50-55 no. wind turbines with a maximum height of 220 metres, a 220kV substation and underground cabling, with a total output of c. 240MW, with the potential for the wind farm to generate greater than 50 Megawatts (MW) of electricity to the National Grid.

A SID meeting under the provisions of Section 37B was held with the ACP on 26th July 2021. Those in attendance were:

On behalf of ACP:

- Ciara Kellett (Assistant Director of Planning)
- Donal Donnelly (Senior Planning Inspector)
- Niamh Thornton (Executive Officer)

On behalf of Applicant and Agent:

- Caitríona Carter (BnM)
- Muriel Ennis (BnM)
- Sean Creedon (BnM)
- Jimmy Green (MKO)
- Karen Mulryan (MKO ENV)
- Paul Sweeney (MKO PLN)

The design team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- A High-level overview of the Proposed Project and the Project Site.
- Introduction to the applicant.
- Overview of planning policy including compliance with local wind energy policy.
- Provided specific details of the scheme relating to LVIA, Ecology and Aviation.
- Set out the scope of the Environmental Impact Assessment Report to be undertaken.
- Discussed scoping & pre-application/public consultation undertaken to date.
- Set out the projected project timelines.
- Discussed the relevant Strategic Infrastructure Development criteria as set out in the 7th Schedule of the Planning Act.

Following this presentation, there was further discussion held between the project team and the representatives of ACP at this meeting. Matters discussed included:

- Noted that the turbine number and output mean the Proposed Project exceeds the 7th Schedule threshold.
- LVIA viewpoints to be chosen carefully, taking into account worst-case scenarios.
- Focus on cumulative impacts and ecological surveys.
- Condition of local roads to be considered when assessing haul routes.
- Recommended recent windfarm cases brought for Judicial review be looked at.

Second Meeting

A Second pre-application meeting was held with ACP via MS Teams on 10th March 2026. Those in attendance were:

On behalf of ACP:

- Lauren Murphy (ACP - Admin)
- Una Crosse (ACP - Assistant Director of Planning)
- Donal Donnelly (ACP – Senior Planning Inspector)
- Emmet Smyth (ACP - Senior Environmental Scientist)
- Paula Kearney (ACP – Senior Ecologist)
- Ian Boyle (ACP – Senior Planning Inspector)
- Adrian Ornsby (ACP - Planning Inspector)

On behalf of Applicant and Agent:

- Ronan Dunne (MKO Planning)
- Shikha Gajula (MKO Planning)
- Ellen Costello (MKO ENV)
- Catherine Johnson (MKO ENV)
- Ciaran Fitzgerald (MKO ENV)
- Kate O'Donnell (MKO ECO)
- Patrick Manley (MKO ORN)
- Caitríona Carter (BnM)
- Anna Perdue (BnM)
- Ellen Hilliard (BnM)
- Muriel Ennis (BnM)
- Julie Larkin (BnM)

The design team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- Introduction to the applicant.
- A High-level overview of the Proposed Project and the Project Site.
- Updates on Constraint Assessment & Design Process
- Overview of the Proposed Project
- Set out the scope of the Environmental Impact Assessment Report to be undertaken.
- Overview of planning policy including compliance with local wind energy policy.
- Scoping & pre-application/public consultation undertaken to date.
- Discussed the relevant Strategic Infrastructure Development criteria as set out in the 7th Schedule of the Planning Act.
- Set out the projected project timelines.

Following this presentation, there was further discussion held between the project team and the representatives of ACP at this meeting. Matters discussed included:

- Evolution of the Proposed Project to be assessed along with the proposed turbine and substation locations and alternative considerations.
- EIA and AA to employ most up to date guidance for survey and assessment with clear and concise reporting.
- Lessons learnt from other windfarm developments to be included.
- Forward baseline assessment and future trends.
- Engagement with statutory bodies recommended.

- Ecological survey requirements discussed including receptor identification, buffer zones, vegetation management, baseline surveys, and ensuring IPC licence conditions align with biodiversity enhancement measures.
- Substitute consent application to be submitted.
- Water crossings to be agreed with IFI prior to submission of the planning application.
- Assessment of internal road network to be included.
- Recommended consultation with NPWS in relation to derogation licences, if required.
- Visual impact assessment to be undertaken.
- Haul route and turbine delivery route to be assessed for vegetation removal.
- Importance of cumulative impact assessment emphasised.
- Robust noise assessment to be undertaken, including mapping of distance from proposed turbines to residential dwellings.

Third Meeting

A Third pre-application meeting was held with ACP via MS Teams on 12th June 2026. Those in attendance were:

On behalf of ACP:

- Lauren Murphy (ACP - Admin)
- Una Crosse (ACP - Assistant Director of Planning)
- Donal Donnelly (Senior Planner Inspector)
- Emmet Smyth (ACP - Senior Environmental Scientist)
- Paula Kearney (Senior Ecologist)
- Maeve Maher-McWilliams (Ecologist)

On behalf of Applicant and Agent:

- Caitriona Carter (BnM)
- Anna Perdue (BnM)
- Julie Larkin (BnM)
- Chris Cullen (BnM)
- Ronan Dunne (MKO PLN)
- Shikha Gajula (MKO PLN)
- Ellen Costello (MKO ENV)
- Catherine Johnson (MKO ENV)
- Kate O'Donnell (MKO ECO)
- Patrick Manley (MKO ORN)
- Aoife Joyce (MKO Bats)
- Molly O'Hare (MKO Bats)
- Michael Gill (HES)
- Conor McGettigan (HES)
- Ian Higgins (FTC)

The design team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- Update on the Proposed Project
- Update on the baseline environment
- Hydrology and Hydrogeology
- Land, soils and peat
- Biodiversity
- Ornithology
- Proposed Project timelines

Following this presentation, there was further discussion held between the project team and the representatives of ACP at this meeting. Matters discussed included:

- Forward baseline assessment and future trends.
- Confirmed that PCAS is substantially complete at Lodge Bog.
- Trim GWB and groundwater contribution of phosphorus to surface waters to be addressed as part of the WFD assessment in the EIAR.
- Clarification on the assessment of water resources, surface water bodies and groundwater conditions along the Proposed Grid Connection and within the Proposed Wind Farm site.
- Overall peat stability risk considered to be low to negligible.
- Approach to assessing biodiversity impacts over the project lifecycle.
- Relationship between identified badger setts and Long Derries SAC, sett status and potential mitigation requirements.
- Consideration of future habitat condition and suitability following proposed enhancement measures.
- Prioritise retention of existing vegetation corridors, with trimming considered where possible instead of removal, and account for these impacts within the cumulative effects assessment and mitigation measures.
- Habitat loss calculations to be included within the Biodiversity Chapter of the EIAR, clearly explaining the approach taken, and identifying potential net biodiversity gain.
- The differentiation between mitigation, compensation/offsetting and enhancement measures within the EIAR.
- Calculations of habitat loss to be provided within the application along with calculations in relation to habitat loss from the deterrent measures with detail on how this is offset by the enhancement measures.
- Finalisation of habitat loss calculations and enhancement measures.
- Discussion on Whooper Swan and Hen Harrier and consultation with NPWS
- Consideration of Lodge Bog enhancement measures, including the expansion of breeding wader habitat, scrub management and use of protective measures such as predator-proof fencing.
- Golden Plover mitigation, deterrent measures and enhancement proposals. Collision risk modelling, habitat loss calculations, deterrent habitat design, mitigation hierarchy and effectiveness of proposed measures.
- Consideration of cumulative impacts with Cloncreen Wind Farm and potential further design optimisation.
- Discussion on calculation methodologies, habitat size, vegetation growth and relevant guidance.

Fourth Meeting

A fourth pre-application meeting was held with ACP via MS Teams on 28th August 2026. Those in attendance were:

On behalf of ACP:

- Lauren Murphy (ACP - Admin)
- Una Crosse (ACP - Assistant Director of Planning)
- Donal Donnelly (Senior Planner Inspector)
- Emmet Smyth (ACP - Senior Environmental Scientist)
- Paula Kearney (Senior Ecologist)
- Maeve Maher-McWilliams (Ecologist)

On behalf of Applicant and Agent:

- Chris Cullen (BnM)

- Anna Perdue (BnM)
- Ellen Hilliard (BnM)
- Muriel Ennis (BnM)
- Julie Larkin (BnM)
- Caitriona Carter (BnM)
- Ronan Dunne (MKO PLN)
- Shikha Gajula (MKO PLN)
- Ellen Costello (MKO ENV)
- Catherine Johnson (MKO ENV)
- Ciaran Fitzgerald (MKO ENV)
- Patrick Manley (MKO ORN)
- Padraig Cregg (MKO ORN)
- Kathryn Sheridan (MKO ORN)
- Kate O'Donnell (MKO ECO)
- Jack Workman (MKO LVIA)
- Dija Mazonaite (MKO LVIA)
- Alan Lipscomb (Alan Lipscombe Traffic and Transport Consultants Ltd.)
- Dermot Blunnie (AWN Consulting)
- Miguel Cartyuvels (AWN Consulting)
- Miriam Carroll (Tobar Archaeology)
- Peter Foulsham (Cyrrus)
- Kevin Hayes (AI Bridges)

The design team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- Overview of IPC licence and substitute consent application.
- Relevant Strategic Infrastructure Development criteria as set out in the 7th Schedule of the Planning Act.
- Overview of planning policy including national and regional planning context, the local policy context and local wind energy zoning.
- Clarifications from the third pre-application consultation relating to likely future receiving environment, timelines on baseline assessments, and other particular considerations including biodiversity, ornithology, geology, water and climate.
- Noise and vibration.
- Shadow flicker.
- Landscape and Visual Impact Assessment.
- Cultural heritage
- A high-level overview of traffic and transport including traffic counts, transport delivery route, proposed construction haul routes, junction design and capacity and site entrances.
- Other material assets including telecommunication and aviation assessment, telecom impacts and built services.
- Discussed consultation with statutory and public bodies undertaken.
- Set out the application contents including planning documents and planning drawing scales and the scope of the Environmental Impact Assessment Report.

Following this presentation, there was further discussion held between the project team and the representatives of ACP at this meeting. Matters discussed included:

- Transitional arrangements under the New Planning Act and RED III provisions to be incorporated via the New Regulations.
- Discussed the importance of distinguishing the current baseline from the likely future receiving environment, including natural revegetation and the cutaway bog rehabilitation measures. Recommended a clear comparison of the proposed measures and IPC measures.

- The use of 'offsetting' rather than 'compensation' in the EIAR terminology and keep mitigation, offsetting and enhancement clearly separated.
- The intact bog area excluded from deterrent planting to be clearly shown and verified against bird requirements.
- Discussion in relation to breeding curlew, vantage point surveys and associated feedback loop.
- Searcher proficiency and scavenger-removal trials with respect to carcass searches to be included in the EIAR.
- Discussion on cumulative effects, collision risk for golden plover, displacement and habitat loss.
- Discussion on cumulative noise effects, revised UK wind turbine noise guidance, baseline surveys and protocol for dealing with operational noise complaints.
- Different types of sensitive receptors in relation to shadow flicker to be clearly identified.
- Discussion on zero shadow flicker being technical best practice, to be included as embedded mitigation or otherwise justified.
- Future receiving environment to be considered with respect to LVIA. Implications of the revised Nature Corridor designation as per the OCDP Variation No. 1 be considered.
- Recommended clarifying the scope and locations of archaeological versus geotechnical investigations and determine whether additional pre-application archaeological testing is required.
- Discussion on the potential impacts on the Virgin Media link. If it remains operational following consent, the pre-agreed mitigation option will be selected, funded by the developer.
- Discussion on the Military Operating Area 4 and the potential impacts of the Proposed Project being located in low-flying area for helicopters.
- Consideration of red aviation lights on turbines impacting birds such as the use of flashing instead of static light.
- Drawing scaled to be agreed with ACP ahead of the application being lodged.
- A standalone schedule of significant effects, similar to the mitigation schedule to be included.
- Final description of the proposed project be forwarded to ACP.
- Consideration be given to orientation, spacing, etc in relation to wind farms in the vicinity of the Proposed Project.
- Brief credential, and relevant experience of ornithology surveyors be included.

SID Determination

A letter received from ACP dated 12th October 2026 stated that under Section 37B (4)(A), it is the opinion of the Commission that the Proposed Project falls within the scope of the paragraphs 37A(2)(a) and (b) of the Planning Act. This confirmed that the Proposed Project constitutes SID and therefore the planning application should be made directly to ACP.

2.9.4 Other Consultations

2.9.4.1 Offaly County Council Roads Department

Members of the project team and the Applicant met with representatives from OCC Roads Department via MS Teams on 4th September 2025. Those in attendance were:

On behalf of OCC Roads Department:

- John Mitchell (Senior Engineer in the Roads Section)
- Rory Moore (District Engineer in Edenderry Area)

- Enda Daly (Executive Engineer working in Edenderry District)
- Ben McArdle (Senior Executive Engineer Roads Section)

On behalf of Agent and Applicant:

- Sean Creedon (MKO ENV)
- Susan Doran (MKO ENV)
- Catherine Johnson (MKO ENV)
- Kate Mahony (MKO)
- Alan Lipscombe (Alan Lipscombe Traffic and Transport Consultants Ltd.)
- Julie Larkin (BnM)
- Jerry Brennan (BnM)
- John McDonagh (BnM)
- Muriel Ennis (BnM)

Matters discussed include:

- Clarifications in relation to turbine delivery routes (TDR), haul routes and TDR works.
- Feedback requested in relation to safety concerns.
- Concerns raised in relation to the capacity of the L1001 road to hold up to construction traffic.
- Requested feedback to see if any modelling can be done in relation to the impact of the construction periods traffic and transport on the roads.
- Current Annual Average Daily Traffic (AADT) values and AADT values at mid-construction phase required to determine the uplift the road network.
- Requirement of a Road Safety Audit (RSA) given the scale of the Proposed Project. RSAs need to be undertaken at each access location.
- Concerns at bridges and culverts. Any infrastructure along these routes would have to be investigated for load carrying capacity.
- Detailed assessment of haul routes required.
- HGV traffic during construction period. Details on the programme and phasing of the construction phase required.
- Pre and post constructions surveys to be completed, agreed with Edenderry as the road's authority, before any works are carried out.
- Details of Access junctions 1 and 4 discussed.
- Restoration plan for the roads to be agreed with OCC.
- Details of traffic count surveys discussed.
- Raised concern that multiple large developments (wind farms, solar farms etc.) in the area may be drawing on the same suppliers and using the same road network simultaneously or in overlapping timeframes.
- Given the scale of investment required to repair and maintain roads to an acceptable standard, assurances that pre and post construction road surveys and budgeting are put in place to recover roads to a reasonable condition after works are complete.

2.9.4.2 Kildare County Council Roads Department

First Meeting

Members of the project team and the Applicant met with representatives from KCC Roads Department in person on 22nd August 2025. Those in attendance were:

On behalf of KCC Roads Department:

- Daragh Conlan
- Alan Dunney

- Cyril Buggie
- Stephen Willoughby
- Breda Maher

On behalf of Agent and Applicant:

- Kate Mahony (MKO)
- Sean Creedon (MKO ENV)
- Susan Doran (MKO ENV)
- Alan Lipscombe (Alan Lipscombe Traffic and Transport Consultants Ltd.)
- Caitríona Carter (BnM)
- Julie Larkin (BnM)
- Jerry Brennan (BnM)
- John McDonagh (BnM)
- Paul Cash (BnM)

Matters discussed include:

- The impact of the underground grid cable, construction of the grid cable, and haul routes during the construction phase.
- KCC raised concerns about the roads' ability to handle the volume of construction traffic. Load assessments, route compliance and road maintenance plans were discussed.
- Diversion routes need to be revised and fully assessed.
- Concerns were raised around the constructability of the grid within the road corridor, given the fragile bog road and peat subsoil conditions. Potential issues were raised in relation to maintenance of the grid infrastructure and the road.
- KCC recommended that detailed assessments are to be covered in the EIAR on how the grid and roads are constructed.
- The cumulative impact of other projects in the area (by EirGrid and Uisce Éireann) was also highlighted.
- Recommended engagement with local councillors and maintaining road quality throughout project.

Second Meeting

Members of the project team and the Applicant met with representatives from KCC Roads Department via Microsoft Teams on 3rd September 2026. Those in attendance were:

On behalf of KCC Roads Department:

- Daragh Conlan (KCC)
- Cyril Buggie (KCC)
- Annette Keaveney (KCC)
- Ronan Toft (KCC)
- Mark Evan (KCC)

On behalf of Agent and Applicant:

- Julie Larkin (BnM)
- Ellen Hilliard (BnM)
- Anna Perdue (BnM)
- Muriel Ennis (BnM)
- Jerry Brennan (BnM)
- Paul Cash (BnM)
- John McDonagh (BnM)

- Catherine Johnson (MKO ENV)
- Ellen Costello (MKO ENV
- Ciarán Fitzgerald (MKO ENV)
- Alan Lipscombe (Alan Lipscombe Traffic and Transport Consultants Ltd)

Matters discussed include:

- The Proposed Grid Connection, including the rolling construction methodology, diversion routes, traffic management options and other mitigation measures.
- Whether road widths and heights would allow a one-lane closure, the interaction with bridges along the grid route, and the condition of the road network.
- Wait time at closures discussed. KCC requested that obligations be written into contracts with any third-party construction contractors. The road opening licence requirements and the handover between BnM and KCC were highlighted as key points for the construction phase.
- Pre-commencement and post-construction road surface surveys were confirmed, with surveys to continue throughout construction. KCC stated it would seek a sectional completion condition in the road opening licence.
- KCC identified the road from Prosperous to the Project Site as critical and likely to be affected by the grid connection works. Also requested that all HDD locations be identified.
- The cumulative impact of the Drehid waste management facility, which shares similar haul routes.
- KCC confirmed that a landowner consent letter for the grid connection under the new Act would not be an issue.
- The Road Opening Licence process will be opened and consulted on with KCC.

2.9.4.3 National Parks and Wildlife Service

Members of the Project Team, including Environmental Scientists, Ecologists and Ornithologists met with the NPWS on 26th May 2026 via MS Teams to discuss the Proposed Project. Those in attendance were:

On behalf of NPWS:

- Eoin Connolly (Ecologist Grade II)

On behalf of Agent and Applicant:

- Ellen Costello (MKO ENV)
- Catherine Johnson (MKO ENV)
- Sarah Mullen (MKO ECO)
- Kate O'Donnell (MKO ECO)
- Katy Beckett (MKO ECO)
- Padraig Cregg (MKO ORN)
- Patrick Manely (MKO ORN)
- Aoife Joyce (MKO Bats)
- Molly O'Hare (MKO Bats)
- Julie Larkin (BnM)
- Ellen Hilliard (BnM)
- Muriel Ennis (BnM)
- Chris Cullen (BnM)

The main topics discussed in the meeting included the following:

- An overview of the Proposed Project.

- Ecological surveys which have been undertaken to date and their findings.
- Ornithology surveys which have been undertaken to date and their findings.
- Proposed plans for habitat enhancement and management measures.
- The interaction between IPC rehabilitation proposals and enhancement and mitigation measures associated with the Proposed Project.

Further detail on this meeting can be found in Chapter 6 and Chapter 7 of the EIAR.

2.9.4.4 Department of Defence

Members of the Project Team, including Environmental Scientists and aviation experts met with the DoD on 19th May 2026 via MS Teams to discuss the Proposed Project. Those in attendance were:

On behalf of DoD and Irish AirCorps:

- Eoin McDonnell
- Sarah Kelly
- Philomenta Evans
- Christina Hickey
- Stewart Begley
- Warren Downey

On behalf of Agent and Applicant:

- Ellen Costello (MKO ENV)
- Catherine Johnson (MKO ENV)
- Ciarán Fitzgerald (MKO ENV)
- Peter Foulsham (Cyrrus)
- Kevin Hayes (AI Bridges)
- Muriel Ennis (BnM)
- Caitríona Carter (BnM)

The main topics discussed in the meeting included the following:

- An overview of the Proposed Project.
- Aviation assessment, aviation designations and low-flying training areas
- Aerodrome safeguarding
- Radar impact assessment
- Cumulative effects

Further detail on this meeting can be found in Chapter 16 of the EIAR.

2.9.4.5 EirGrid & ESB

Members of the Project Team met with the Eirgrid and the ESB on 16th December 2025 via MS Teams to discuss the Proposed Project. Those in attendance were:

On behalf of EirGrid and ESB:

- Fay Lagan (EirGrid)
- Ciaran O'Reilly (EirGrid)
- Loretta Flynn (EirGrid)
- Roy Coldrick (ESB)
- John Gibbons (ESB)

On behalf of Agent and Applicant:

- Ellen Costello (MKO ENV)
- Ciarán Fitzgerald (MKO ENV)
- Aisling Thompson (MKO ENV)
- Julie Larkin (BnM)
- Muriel Ennis (BnM)
- Paul Cash (BnM)
- John McDonagh (BnM)

The main topics discussed in the meeting included the following:

- An overview of the Proposed Project
- Construction phasing and timelines
- Traffic and transport impacts
- Cumulative impacts
- Abnormal loads

2.9.4.6 Inland Fisheries Ireland

Members of the Project Team met with Inland Fisheries Ireland (IFI) on 5th October 2026 via MS Teams to discuss the Proposed Project. Those in attendance were:

On behalf of IFI:

- Donnachadh Byrne (Environmental Officer for the Area)
- Lonan O'Farrell (Development Inspector for the Southeast)

On behalf of Agent and Applicant:

- Julie Larkin (BnM)
- Ellen Hilliard (BnM)
- Anna Perdue (BnM)
- Muriel Ennis (BnM)
- Enda McDonagh (BnM)
- Ellen Costello (MKO ENV)
- Catherine Johnson (MKO ENV)
- Ciarán Fitzgerald (MKO ENV)
- Kate O'Donnell (MKO ECO)
- Katy Beckett (MKO ECO)
- Bill Brazier (Triturus – Fisheries and Aquatic Ecology Surveyors)
- Ross Macklin (Triturus – Fisheries and Aquatic Ecology Surveyor)

The main topics discussed in the meeting included the following:

- An overview of the Proposed Project
- Fisheries and aquatic ecology surveys
- River condition and water quality
- Riparian and river restoration
- Watercourse crossing and culvert design
- Mitigation, offsetting and enhancement

2.9.4.7 Other Relevant Bodies

BnM met with representatives from Butterfly Conservation Ireland, Irish Peatland Conservation Council (IPCC) and Lullymore Heritage Park on 23rd February 2023 at Lullymore Heritage Park to discuss the Proposed Project.

2.9.5 Community Consultation

Between October 2020 and 2026, the Applicant, undertook an extensive and structured community engagement programme for the Proposed Project. This Programme was adapted throughout to reflect evolving Covid 19 public health restrictions and incorporated household outreach, virtual platforms, online and in-person clinics, communication with elected representatives and community groups, public information events and ongoing correspondence.

The Community Engagement Strategy for the Proposed Project was based around engaging with the local community in an open, honest and transparent manner with the aim to not only provide clear and understandable information but also to gain feedback to understand the views of the local community. The feedback and information have been used to inform the design process.

The Proposed Project was launched in October 2020, during the COVID-19 pandemic. Household outreach commenced on 5th October 2020 and concluded on 13th November 2020, during which Project Information Packs were delivered to residences within approximately 1.5 km radius of the area of the site. The information contained in the pack consisted of the following:

- Introductory Letter.
- Accompanying Letter outlining engagement approach post 14th October due to additional Covid-19 measures announced by the Government.
- Details of Virtual Consultation Room.
- Project Information Brochure – including Community Liaison contact details for any follow up queries or concerns.
- An A2 double-sided map – outlining the study area for the Proposed Development.
- A Feedback Questionnaire – to submit any comments/suggestions or identify other
- people/groups who should be included on the circulation list for project updates.
- A Consent form – to join the Proposed Development's postal system.
- A Freepost envelope – to facilitate the return of completed Feedback Questionnaire;
- Communications Opt-Out form and Consent form to the Project Team.
- A Community Engagement Clinic Flyer – with details on how to book by appointment only session.

To ensure continued communication, the Project Team implemented a suite of alternative engagement measures, including a dedicated project website, a 3D virtual consultation room, and appointment-only online Community Engagement Clinics. A dedicated project website and 3D virtual consultation room were launched in October 2020, with the virtual room remaining available until 30th January 2021. Feedback questionnaires were available in print and online between October 2020 and January 2021. Appointment based online Community Engagement Clinics commenced on 1st February 2021 and were held over a two-week period.

A dedicated Community Liaison Team was appointed in October 2020 to provide an accessible and consistent point of contact for local residents and stakeholders. Between 8th June 2021 and 11th August 2021, an updated Project Information Pack was delivered to approximately 1,014 homes. The information contained in the pack consisted of the following:

- The draft Turbine Layout
- Project information booklet
- Photomontage booklet
- A2 Draft layout map
- Feedback questionnaire

The dedicated project website and 3D virtual consultation room were updated with the Phase 2 consultation material, and the virtual room remained available until 2nd September 2021. Appointment-only Community Information Sessions were held at Allenwood Development Association

on 30 June and 21 July 2021 and at Rathangan Community Centre on 7 July 2021. The sessions were also promoted through advertisements in the Leinster Leader and Kildare Nationalist and radio broadcasts on Midlands 103 and KFM. 19 no. expressions of interest were received; 15 no. clinics were held and 39 no. completed feedback questionnaires were received between June and September 2021.

Between 19th August 2022 and 15th September 2022, a further Project Information Pack was delivered to approximately 800 homes within approximately 2 km of the proposed turbine locations. The information contained in the pack consisted of the following:

- The Final turbine layout
- Infrastructure and proximity maps
- The Draft Amenity Plan
- An amenity questionnaire

Relevant County Councillors and TDs were provided with the same project-stage information in August 2022. In August and September 2024, a project update letter outlining the anticipated planning application submission timeline was delivered to approximately 800 homes within 2 km of the proposed turbines and was also issued to relevant elected representatives.

Between 13th April and 8th May 2026, information on the proposed grid connection route was distributed to approximately 1,150 homes within approximately 2 km of the proposed turbine locations and adjacent to the proposed route. Community Information Sessions were held in Prosperous on 18 May 2026 and Allenwood on 20 May 2026

Community Information Sessions were held in Prosperous, Co. Kildare on 18th May 2026 and Allenwood, Co. Kildare on 20th May 2026, with more than 30 people attending across the two events, providing an opportunity for direct engagement with the Project Team and specialist consultants. Throughout the pre-planning period, engagement was further supported through ongoing correspondence, meetings with residents and community groups, and continuous availability of a dedicated CLO.

The objective of the consultation was to ensure that the views and concerns of all were considered as part of the Proposed Project Design and EIA process. Appendix 2-2 of this EIAR contains a full and detailed Community Report. The report was prepared to record the consultation carried out with local community in respect of the Proposed Project.

Active engagement and consultation with the local community have taken place from an early stage during the pre-application phase of the Proposed Project. The consultation process has been an extremely valuable exercise and has provided a detailed understanding of the key issues and concerns of the local community, which has ultimately shaped the final project proposal. Following lodgement of the planning application, the refined layout map will be provided to residents within approximately 2 km of a proposed turbine and to relevant elected representatives, together with information on where the planning application documentation can be viewed.

The development of the Proposed Project will provide an enduring economic benefit to the communities surrounding the Proposed Project, through the potential community benefit package for residents and community groups, employment during the construction and operation of the Proposed Project and through the annual rates payable to the Local Authority.

Please refer to the Community Engagement Report at Appendix 2-2 of the EIAR for further details.

2.10 Cumulative Impact Assessment

The EIA Directive and associated guidance documents state that as well as considering any direct, indirect, secondary, transboundary, short, medium, and long-term, permanent and temporary, positive

and negative effects of the project the description of likely significant effects should include an assessment of cumulative impacts that may arise. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to a proposed development or project. The factors to be considered in relation to cumulative effects include population and human health, biodiversity, land, soil, water, air quality, climate, material assets, landscape, cultural heritage, and major accidents / vulnerability to natural disasters, as well as the interactions between these factors.

To gather a comprehensive view of cumulative impacts on these environmental considerations and to inform the EIAR process being undertaken by the consenting authority, each relevant chapter within this EIAR includes a cumulative impact assessment where appropriate.

The potential for cumulative impacts arising from other projects has therefore been fully considered within this EIAR.

2.10.1 Methodology for the Cumulative Assessment of Projects

The potential cumulative impact of the Proposed Project and combined with the potential impact of other projects or plans has been carried out with the purpose of identifying what influence the Proposed Project will have on the surrounding environment when considered collectively with proposed and existing projects, projects pending a decision from the planning authority, projects in the public domain such as those Strategic Infrastructure Development (SID) at pre-consultation with ACP, and land-uses in the vicinity of the Project Site.

The cumulative impact assessment of projects has three principle aims:

1. *To establish the range and nature of existing and approved projects within the cumulative impact study area of the Proposed Project.*
2. *To summarise the relevant projects which have a potential to create cumulative impacts.*
3. *To identify the projects that hold the potential for cumulative interaction within the context of the Proposed Project and discard projects that will neither directly nor indirectly contribute to cumulative impacts. (Note: this is done by individual competent experts with respect to their specialist area of expertise.)*

Projects were identified through a search of relevant online planning registers and effects were considered following a review of associated EIARs.

2.10.1.1 Establishing the Cumulative Long List

To establish a long list of existing, permitted and proposed projects to be included in the cumulative impact assessment, cumulative study areas were established for each individual topic area in the EIAR. Following consultation with the EIAR team on each individual topic, the maximum geographical extent of each cumulative study area and justification for this extent was established and is presented in Table 2-8 below. Each cumulative study area was established with regard for the potential environmental receptors, potential impact pathways, topic specific guidance, best practice and professional judgement.

Table 2-8 Cumulative Study Area

Individual Topic	Maximum Extent	Justification
Population & Human Health (including shadow flicker)	Population Study Area for (District Electoral Divisions)	The Study Area for Population and Human Health is identified in Section 5.2.1 in Chapter 5 as the Electoral Divisions where the Proposed

Individual Topic	Maximum Extent	Justification
	Shadow Flicker Study Area (10xRotor Diameter (RD) buffer from proposed turbines).	Project is located (excluding the Electoral Divisions traversed only by the Proposed Turbine Delivery Route, which have been screened out). This Study Area considers the Proposed Project, i.e. both the Proposed Wind Farm and the Proposed Grid Connection, as a whole. This Study Area for Population identified is considered for cumulative effects on Population. Cumulative effects on Human Health are assessed primarily within the defined Population Study Area, with the assessment informed by the discipline-specific study areas established for the relevant EIAR disciplines. For the assessment of cumulative shadow flicker, any other existing, permitted or proposed wind farms are considered where their ten times rotor diameter shadow flicker study area are located within the Shadow Flicker Study Area of 1.7km (ten times the RD from proposed turbines) for the Proposed Project.
Biodiversity – Flora & Fauna	10km from the Proposed Wind Farm and 200m from the Proposed Grid Connection underground cabling route.	Using the precautionary approach and given the nature and scale of the Proposed Project, the geographical boundary for terrestrial ecological aspects, i.e., habitats and terrestrial species (excluding birds and bats, which are addressed separately), is 10km from the Proposed Wind Farm and 200m from the Proposed Grid Connection underground cabling route.
Biodiversity - Bats	15km from the Proposed Turbines.	Bats are a mobile species which can cover large distances for foraging and roosting over a range of varied habitats. NatureScot (2021) *'Bats and onshore wind turbines - survey, assessment and mitigation'* recommends a 10km cumulative study area for bats. Bat Conservation Ireland (2026) *'Bat Survey, Assessment & Mitigation Guidelines for Onshore Wind Turbines in Ireland'* recommends an increased cumulative impact assessment zone of 15km. Therefore, on a precautionary basis, a 15km cumulative study area is considered for potential cumulative effects on bats.
Birds	25km from the Proposed Turbines for assessment at the regional/county scale; 5km from the Proposed Turbines for	NatureScot guidance '*Assessing the Cumulative Impacts of onshore Wind Energy Developments'* (SNH[42], 2012; 2018) was consulted while undertaking the cumulative assessment. SNH (2012; 2018) emphasises that its priority is to 'maintain the conservation status of the species

[42] *SNH now NatureScot*

Individual Topic	Maximum Extent	Justification
	assessment at the local scale.	population at the national level.' However, it is acknowledged that consideration should also be allowed for impacts at the regional level 'where regional impacts have national implications (for example where a specific region holds the majority of the national population)'. Following the guidance of SNH (2012), the cumulative impact assessment has been carried out at the scale of the importance rating of the receptor. A 25km radius of the Proposed Turbines was considered a reasonable approximation of the size of a county, and a 5km radius of the Proposed Turbines was considered a reasonable approximation for the local level.
Land, Soils and Geology	The Project Site.	As there is no pathway for offsite cumulative impacts for Land, Soils and Geology, the cumulative study area has been defined as the Project Site. The Proposed Construction Haul Routes are screened out of the study area as no excavations or land-take are proposed along them. The only offsite pathway (drainage and surface water) is assessed in Chapter 9: Water.
Water	Water Study Area (Figure 9-1): the Figile and Slate River catchments as far downstream as the confluence with the River Barrow, the Boyne_010, Boyne_020 and Awillyinish Stream_010 WFD river sub-basins and the WFD river sub-basins of the Proposed Turbine Delivery Route accommodation works. Smaller plans and projects (e.g. one-off housing) are screened at WFD river sub-basin level.	The Proposed Wind Farm is located primarily in the River Barrow Catchment and is drained by the Figile and Slate rivers. The catchments of the Slate and Figile rivers, as far downstream as the confluence with the Barrow River, form the main Study Area. A small area in the north of the Proposed Wind Farm lies within the River Boyne Catchment. However, there is no outfall from the Proposed Project to the River Boyne or its tributaries. Nevertheless, the Boyne_010 and Boyne_020 WFD river sub-basins are included in the Study Area for the purposes of a conservative impact assessment. The Proposed Grid Connection is also predominantly drained by the Figile and Slate rivers and therefore falls within the main Hydrological (Surface Water) Study Area. A small section of the Proposed Grid Connection underground cabling route and the Proposed Offsite Substation are located in the Liffey and Dublin Bay Catchment. These elements of the Proposed Project are mapped in the Awillyinish Stream_010 WFD river sub-basin which has also been included in the Hydrological (Surface Water) Study Area.

Individual Topic	Maximum Extent	Justification
		The WFD river sub-basins within which the proposed temporary accommodation works along the Proposed Turbine Delivery Route are located have been included in the Study Area. Given the limited scale and nature of the works, inclusion of the wider catchments is not considered to be necessary.
Air Quality	1km buffer from Project Site.	In accordance with IAQM guidance, (*Assessment of Dust from Demolition and Construction*, IAQM 2024), the geographical boundary for dust deposition is defined as the Dust Study Area. Chapter 10 also defines an Air Quality Study Area (a 250m buffer of the Project Site, Proposed Construction Haul Routes and Proposed Turbine Delivery Route) and an Ecological Dust Study Area (20m and 50m buffers). As the Dust Study Areas extends up to 250 m from a works area; to account for dust and other air pollutants which are released into the atmosphere, professional judgement has been applied to extend the study area to 1 km, thereby capturing potential cumulative effects of dust and air pollutants.
Climate	Global, National and Regional Climate Study Areas (Section 11.1.1 of Chapter 11). Cumulative effects are assessed on a national basis and are not confined to a specific geographical study area.	The Climate assessment has considered the cumulative effects of the Proposed Project with other developments on a national basis against the Electricity Sector Emissions Ceiling and national carbon budgets. Local plans and projects within the Regional Climate Study Area (Co. Offaly and Co. Kildare) are considered for in-combination effects.
Noise & Vibration	25km from Proposed Turbines	The identified 25km geographical boundary is used to identify all potential wind farms or single turbines that may present a cumulative noise effect when considered with the Proposed Wind Farm. This is then refined to the area within which noise levels from the proposed, consented and existing wind turbine(s) may exceed 35 dB LA90 with the contribution of the Proposed Turbines limited by the Institute of Acoustics (IOA) Good Practice Guide (GPG) '10 dB rule' to the 30 dB LA90 contour (the Proposed Turbine Operational Study Area). The assessment is based on the WEDG 2006 supported by IOA GPG to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise (IOA, 2013) and the ARWTN (2026), which supersedes ETSU-R-97.

Individual Topic	Maximum Extent	Justification
Landscape & Visual	20km buffer from the Proposed Turbines for Landscape and Visual effects (LVIA Study Area). 15km from Proposed Turbines for effects on landscape character (LCA Study Area).	The WEDG 2006 and Draft WEDG 2019 state that "For blade tips in excess of 100m, a Zone of Theoretical Visibility radius of 20km would be adequate." The Landscape Character Area (LCA) study area has been chosen as 15 km for effects on Landscape Character Areas. Through experience conducting LVIA for other wind energy development projects, the assessment team determined that no significant effects on landscape character areas are likely to arise beyond distances of 15 km from the Proposed Turbines. Therefore, a LCA Study Area of 15 km is deemed appropriate for effects on landscape character in relation to the assessment of effects upon designated Landscape Character Areas.
Cultural Heritage	20km buffer from the Proposed Turbines.	Cumulative impacts on setting are more likely to occur at the operational phase of the development (i.e. post-construction). In this regard, in order to assess overall cumulative effects on archaeology and cultural heritage the Proposed Project is considered in the context of other developments, in particular other permitted and proposed wind farms within 20km of the Proposed Turbines. Direct effects for the Proposed Project are considered to be confined to the Project Site and relate to construction effects.
Material Assets: Traffic & Transport	25km from the Proposed Turbines for wind farms and large infrastructural developments; 10km from the Proposed Turbines for other plans and projects.	In accordance with the TII Traffic and Transport Assessment Guidelines (PE-PDV-02045, 2014), the assessment includes developments granted permission but not yet operational, and applications submitted but not yet determined. The potential cumulative traffic effects with the Proposed Project are assessed on the following criteria: › Project status (proposed to operational) › Degree of overlap with the Proposed Construction Haul Routes and Proposed Turbine Delivery Route (low to high) › Traffic volumes (low to high) The geographical boundary for the traffic & transport cumulative assessment is defined by the potential for other projects to overlap with the Proposed Construction Haul Routes and Proposed Turbine Delivery Route, and so a 25km buffer from the Proposed Turbines is deemed appropriate to capture other plans and projects including large infrastructural developments such as wind farms, energy and

Individual Topic	Maximum Extent	Justification
		public transport developments, with the potential for cumulative effects with the Proposed Project.
Material Assets: Telecoms	The Proposed Wind Farm	The Telecoms Study Area is limited to the Proposed Wind Farm, as the risk of electromagnetic interference is highest in proximity to turbine locations. Other existing, permitted or proposed wind farms within the Telecoms Study Area (i.e. the existing Cushaling Wind Farm) are assessed cumulatively in the Telecommunications Impact Assessment (Appendix 15-8).
Aviation	20km from Proposed Turbines	The selection of a 20km geographical boundary for the aviation cumulative study area is founded on established radar and aviation assessment practice as outlined in the EUROCONTROL Guidelines for Assessing the Potential Impact of Wind Turbines on Surveillance Sensors. The EUROCONTROL Guidelines identify a Zone 2 extending to 15km from a primary surveillance radar (PSR) within which a specific impact assessment is required, and a 16km distance from a secondary surveillance radar (SSR) within which large structures should be technically safeguarded. The 20km cumulative boundary extends beyond these individual assessment thresholds on a precautionary basis, in recognition that a cluster of permitted, proposed and existing wind farms may present a combined radar clutter, false-target or line-of-sight effect that would not arise from any one development considered in isolation. On this basis, all wind farms (permitted, proposed and existing) within the 20km buffer are identified and considered against relevant areas of airspace constrained for military use, along with their potential to interfere with aviation assets.

Once the cumulative study areas were identified and justified, a search was conducted across various spatial databases in order to compile a list of projects and ongoing activities in the area. The sources used to establish the cumulative long list are provided in Table 2-9 below. The data was first compiled spatially through a Geographic Information System (GIS). The spatialised data was then exported into a list for further scrutiny and review. This formed the cumulative long list provided in Appendix 2-3.

The maximum extent of each cumulative search buffer was determined by the largest specific cumulative study area buffer (25km from the Project Turbines), as shown in Table 2-8 above. All EIAR chapters did not use the largest buffer. In instances where a specific chapter's cumulative study area was smaller than the cumulative search maximum extent, the cumulative long list was filtered by distance to infrastructure/boundary, creating a chapter specific long list unique to each cumulative study area set out in Table 2-8 above.

Table 2-9: Data sources used for long list compilation

Title	Description	Author
National Planning Application Database	https://housinggovie.maps.arcgis.com/apps/webappviewer/index.html?id=9cf2a09799d74d8e9316a3d3a4d3a8de	Department of Housing, Local Government and Heritage
An Coimisiún Pleanála Cases	https://www.pleanala.ie/en-ie/map-search	An Coimisiún Pleanála
EIA Portal Points	https://housinggovie.maps.arcgis.com/apps/webappviewer/index.html?id=d7d5a3d48f104ecbb206e7e5f84b71f1	Department of Housing, Local Government and Heritage
Licenced Facilities	https://gis.epa.ie/EPAMaps/	EPA
Waste Schemes	https://gis.epa.ie/EPAMaps/ & MKO's internal database	EPA & MKO

To allow sufficient time for the cumulative impact assessment to be undertaken for each EIAR topic, the final search and compilation of the cumulative plans and projects list was carried out in September 2026. Therefore, plans and projects that were applied for after September 2026 are not considered in the cumulative impact assessment.

2.10.2 Projects Considered in the Cumulative Impact Assessment

2.10.2.1 Planning Applications & Permissions

A search was conducted using data from Offaly and Kildare County Councils and the Commission's planning portals to search for all planned and/or permitted planning applications within 25km of the Proposed Turbines. Planning applications considered within this boundary include all live/extant permissions available on the various online portals mentioned above. This distance was chosen as it is considered that cumulative impacts would not exist with any development proposed/permitted made greater than 25km from the Project Site.

Expired planning applications were excluded from the cumulative assessment as it is considered that such development has either been constructed and therefore forms part of the existing baseline or they have not been constructed and the planning permission has expired. Invalid or refused planning applications were also excluded from the cumulative impact assessment. Planning applications (including Local Authority and ACP cases) were then categorised by development description into development categories, and any relevant/large-scale developments were highlighted to the EIAR project team for inclusion in the cumulative impact assessment in each individual EIAR chapter.

Substitute Consent Application for Extraction on Ballydermot and surrounding bogs (Case Ref: SU09.324604)

An application for substitute consent was submitted to ACP (Case Ref: SU09.324604) on 20th August 2026, for peat extraction and ancillary works from July 1988 to the present day that have been carried out within the Proposed Wind Farm site. A Remedial Natura Impact Statement (rNIS) and Remedial Environmental Impact Assessment Report (rEIAR) was submitted with this application. The substitute

consent application includes all areas of where historical industrial peat extraction occurred within the Project Site and is detailed in Section 2.10.2.4 below.

EPA Licences Activities

Described below in Section 2.10.2.3, current activities onsite include site management and environmental monitoring as required under IPC Licence P0503-01 issued by the EPA. The rEIAR and rNIS describe these activities in detail and in particular describe the activities that are intended to be carried out within the Proposed Wind Farm site into the future (i.e. the 'Remedial Phase'). Whilst the Draft Rehabilitation Plans detailed below in Section 2.10.2.3 are the most up to date plans, due consideration of this planning application, and in particular the findings of rEIAR and rNIS have been taken into account in describing the baseline and future environment and in the relevant assessments in this EIAR.

Furthermore, the cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider all potential significant cumulative effects arising from these activities.

Eastern and Midlands Region Water Supply Project – ACP Case Ref: PA92.323980

An application for the Eastern and Midlands Region Water Supply Project was submitted to ACP (Case Ref: PA92.323980) on 19th December 2025. The Water Supply Project includes a water pipeline from a new water treatment plant near Birdhill, Co. Tipperary to a termination point reservoir at Peamount, Co. Dublin. The Water Supply Project pipeline traverses the Project Site in an east- west direction across Codd Bogs 1 & 2, Glashabaun North and South Bogs, and Derrybrennan Bog. The Water Supply Project has been considered in the design of the Proposed Project and is considered in the relevant cumulative impact assessments in this EIAR.

Gas to Bord Na Móna, Edenderry Project – ACP Case Ref: GA19.324280

An application for the Gas to Bord Na Móna, Edenderry Project was submitted to ACP (Case Ref: GA19.324280) on 12th May 2026. The development consists of a proposed underground gas pipeline connection, approx. 23.65km in length, between the existing Edenderry Power Station and the Dublin to Galway high pressure gas pipeline. The gas pipeline runs from the north to the west of the Project Site and has a minor overlap with the application boundary; however, it does not overlap with any infrastructure associated with the Proposed Project. The gas pipeline has been considered in the design of the Proposed Project and is considered in the relevant cumulative impact in this EIAR.

2.10.2.2 Wind Farms within 25km of the Proposed Turbines

A planning search was carried out to establish proposed, permitted and operational wind energy developments within 25km of the Proposed Turbines. The search was carried out using the relevant local authority and ACP databases in September 2026 for relevant planning applications. In total, 14 wind energy projects were identified within 25km of the Proposed Turbines. Early wind energy developments (i.e. those with public consultation commenced) to operational existing wind farms were included. These are outlined in greater detail in Table 2-3 above and summarised below.

- Cushaling Wind Farm – 0.71km south of the proposed turbine T25
- Cloncreen Wind Farm – 2.85km west of the proposed turbine T22
- Ballinla Wind Farm – 7.29km northwest of the proposed turbine T22
- Drehid Wind Farm – 7.44km northeast of the proposed turbine T46
- Derrynadarragh Wind Farm – 7.66km southwest of the proposed turbine T14
- Cushina Wind Farm – 9.3km southwest of the proposed turbine T13
- Mountlucas Wind Farm – 10.37km west of the proposed turbine T22
- Yellow River Wind Farm – 12.11km northwest of the proposed turbine T32

- Clonarrow Wind Farm – 12.91km west of the proposed turbine T22
- Moanvane Wind Farm – 13.87km southwest of the proposed turbine T13
- Garryhinch Wind Farm – 20.01km southwest of the proposed turbine T13
- Ballivor Wind Farm – 21.30km north of the proposed turbine T32
- Dernacart Wind Farm – 22.3km southwest of the proposed turbine T13
- Kilberry Wind Farm – Public Domain

2.10.2.3 EPA Licenced Activities

EPA licensed activities refer to industrial and waste management operations that require a license from the EPA under various pieces of environmental legislation. A list of all EPA licenced activities within the cumulative study area is included in Appendix 2-3.

The categories of EPA licenced activities considered as part of the cumulative assessment are as follows:

- Industrial Emissions (IE) Licensing;
- Integrated Pollution Control (IPC) Licensing;
- Waste Licensing; and
- Waste Water Discharge Authorisations.

Current activities onsite include decommissioning, site management and environmental monitoring as required under Integrated Pollution Control (IPC) Licence P0503-01[43] from the Environmental Protection Agency (EPA). Active commercial peat extraction under IPC Licence No. 503-01 ceased in June 2020. BnM's statutory duties to discharge the conditions of its IPC Licence (Ref. P0503-01; hereafter "IPC Licence"), from the EPA for the Allen Bog Group also remain on-going. These ongoing duties, such as environmental monitoring, do not facilitate the continuation of peat extraction, but rather ensure compliance with BnM's extant IPC Licence.

The IPC Licence is subject to 14. No. conditions pertaining to the ongoing monitoring and maintenance to ensure any emissions from site activities will comply with and not contravene, any of the requirements of Section 83(3) of the Environmental Protection Agency Act, 1992. Conditions 1-4 of the licence outlined the Scope, Management, Interpretation and Notification procedures required by the BnM, respectively. Conditions 5 to 10 pertain to environmental monitoring and management. Conditions 11 to 14 detail the Monitoring (equipment use), Recording and Reporting, Emergency Response and Financial Provisions duties of BnM.

Irrespective of the consenting or construction of the Proposed Project, BnM's statutory duties to discharge the conditions of its IPC Licence will remain ongoing.

IPC Licence (P0503-01) - Draft Rehabilitation Plan

It is also a requirement of '*Condition 10 Cutaway Bog Rehabilitation'* of the IPC Licence that following the decommissioning of use of all or part of their bogs, BnM, prepares (to the satisfaction and approval of the EPA) and implements a Cutaway Bog Rehabilitation Plan for each bog within its landbank under IPC Licence. BnM have produced Draft Rehabilitation and Decommissioning Plans for the Bogs contained within the Allen Bog Group which form part of the Project Site, and it is the intention of BnM to rehabilitate the bogs in a phased approach under IPC Licence. The Draft Rehabilitation Plans are included as Appendix 2-4 and are described below.

BnM have produced a draft Cutaway Bog Decommissioning and Rehabilitation Plan for 10 of the bogs within the Proposed Site (i.e., Ballydermot, Blackriver, Barnaran, Killina, Lullymore, Lullybeg, Derrybrennan, Glashabaun, Codd and Ticknevin). The draft Cutaway Bog Decommissioning and Rehabilitation Plans for Ballydermot North, Ballydermot South, Glashabaun North, Glashabaun South,

[43] *Integrated Pollution Control License PO-503-01 issued by the EPA for the Allen Bog Group*

Codd 1 and Codd 2 have been combined into the respective Ballydermot, Glashabaun and Codd draft Cutaway Bog Decommissioning and Rehabilitation Plans. BnM have produced a final Cutaway Bog Decommissioning and Rehabilitation Plan for Lodge Bog. Please see Appendix 2-4 for details. It is the intention of BnM to rehabilitate the bogs in a phased approach under the requirements of the IPC Licence.

Irrespective of the consenting or construction of the Proposed Project, the measures outlined in the Draft Rehabilitation Plans (Appendix 2-4) will be implemented by BnM in agreement with the EPA, per BnM's IPC Licence Obligations.

2.10.2.4 Peatland Climate Action Scheme

PCAS is a form of enhanced peatland rehabilitation, which is above and beyond what is required under IPC license, and had been successfully implemented at the recently constructed Cloncreen Wind Farm. To date, approximately 24,503ha of peatland has been rehabilitated under the PCAS[44]. is supported by Government through the Climate Action Fund and Ireland's National Recovery and Resilience Plan administered by the Department of Environment, Climate and Communications (DECC). Please see https://www.bnmpcas.ie/ for details. The NPWS acts as the Scheme regulator and there is ongoing engagement with the EPA. This scheme is separate to the IPC licence requirements and does not form part of the Proposed Project application.

The PCAS activities completed at Lodge Bog have also been taken account in describing the baseline environment in the vicinity of the Proposed Project and in the relevant assessments. Furthermore, the cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider all potential significant cumulative effects arising from these activities in the vicinity of the Proposed Project.

2.10.2.5 Arterial Drainage Schemes

The Office of Public Works (OPW) carried out several Arterial Drainage Schemes on catchments under the Arterial Drainage Act, 1945. Under Section 37 of the 1945 Act, the OPW is required to maintain drainage works in proper repair and effective condition. These drainage works include watercourses, embankments and other structures. The Boyne Arterial Drainage Scheme is located on the northern perimeter of the Project Site.

2.10.2.6 Forestry Operations

The Project Site mainly comprises of cutover and cutaway peatland, coniferous forestry and agricultural land. This land-use will continue in conjunction with the operation and decommissioning of the Proposed Project. The potential for cumulative effects during the construction, operational and decommissioning phases of the Proposed Project have therefore been assessed.

Forestry Felling associated with Proposed Project

The Forest Service is responsible for ensuring the development of Forestry within Ireland occurs in a manner and to a scale that maximises its contribution to national socio-economic well-being on a sustainable basis that is compatible with the protection of the environment. The forestry felling associated with the Proposed Project will be carried out under the relevant guidance and under licence from the Forest Service and full details are set out in Chapter 4, Section 4.4.1.8 of the EIAR.
As described in Chapter 4 of this EIAR, permanent felling of commercial forestry will be required as part of the Proposed Project. The felling activities will be subject to a Limited Felling Licence

[44] *The Peatlands Climate Action Scheme (PCAS) is also referred to as the Enhanced Decommissioning, Rehabilitation and Restoration Scheme (EDRRS). https://www.bnmpcas.ie/*

application to the Forest Service in accordance with the Forestry Act 2014 and the Forestry Regulations 2017. The Forest Service policy requires that planning permission for the Proposed Project is available prior to determination of the associated felling licence application. Where replacement afforestation is required by the Forest Service as part of the felling licence process, the replacement afforestation lands will also be subject to the applicable statutory forestry consent process. The specific lands on which any such replacement afforestation would occur have not been identified at this stage.

It is also noted that the Forestry Service's Felling and Reforestation Policy provides for circumstances in which permanent forest removal may be permitted without a requirement for alternative afforestation, including where deforestation is justified by overriding environmental considerations and conversion to open habitat is necessary to benefit the habitat or species concerned. In the case of the Proposed Project, 60.7ha of permanent forestry removal are associated with ornithological offsetting and biodiversity enhancement. The applicability of this provision to the Proposed Project will ultimately be a matter for determination by the Forestry Service through the relevant felling licence process. Accordingly, the EIAR does not assume that an exemption will apply and, on a precautionary basis for the purposes of the environmental assessment, considers the potential effects associated with replacement afforestation on the basis that it may be required.

Replacement of Forestry

Where replacement afforestation is required, the replacement of forestry, felled as part of the Proposed Project, may occur on any lands, within the state, benefitting from Forest Service Technical Approval[45] for afforestation, subject to the spatial and hydrological criteria set out below and to the applicable statutory forestry consent process, should the Proposed Project receive planning permission. Under the Forestry Regulations 2017, all applications for licences for afforestation require the prior written approval (technical approval) of the Minister for Agriculture, Food and the Marine.

The requirements for afforestation licencing are set out in the Forestry Regulations 2017 - this includes consideration of Environmental Impact Assessment and Appropriate Assessment as set out in parts 7 and 8 of the Regulations, respectively. Further detail is set out in the Environmental Requirements for Afforestation (DAFM, 2016)[46]. This ensures that afforestation takes place in a way that complies with environmental legislation and enhances the contribution new woodlands and forests can make to the environment and to the provision of ecosystem services, such as water protection and landscape enhancement.

The typical environmental effects of afforestation include potential effects on biodiversity, soils and geology, hydrology and hydrogeology, cultural heritage, landscape and visual, and air and climate.

The Applicant is seeking a ten-year planning permission which incorporates time to secure a grid connection agreement, a route to market, select the preferred equipment suppliers and put the necessary capital funding in place to allow construction and delivery to commence. Thus, the identification of forestry replacement lands at this stage is seen as premature. If a licence for afforestation was obtained prior to seeking and/or obtaining planning permission, it is highly likely that any licencing approvals sought from the Forest Service would have expired before it could be taken up due to the time required for the planning processes and post-planning delivery preparations. The Forest Service Afforestation Licences expire after 3 years from when they are consented.

Furthermore, as mentioned above, the key environmental issues relating to afforestation include water, biodiversity, archaeology, and landscape. Each is subject to regular updates in terms of best practice, guidelines, standards and national policies. Delaying the identification of alternative afforestation lands until such time as they are required enables identification of optimum lands available (from an

[45] *All proposed forestry developments where the area involved is greater than 0.1 hectare must receive the prior written approval of the Forest Service. The application for approval is known as Pre-Planting Approval – Form 1.*
[46] https://www.gov.ie/en/publication/642e6-forestry/#environmental-requirements

environmental perspective) for afforestation at that time. The EIAR identifies the relevant effect pathways and establishes binding spatial and hydrological parameters for future site selection, with the eventual site-specific assessment then undertaken through the statutory forestry consent process, if afforestation is required.

Notwithstanding that the specific replacement afforestation lands are not presently identified, the potential environmental effects associated with replacement afforestation have been considered within this EIAR. The cumulative study areas identified in Table 2-8 have been established for the assessment of the Proposed Project and are specific to the nature of the potential effects being assessed within each EIAR topic. It is not therefore appropriate to apply each of these study areas automatically as an exclusion area for future replacement afforestation. In particular, cumulative study areas established for effects associated with wind turbines, including those relating to bats, ornithology and landscape and visual effects, do not necessarily represent the spatial extent of potential effects associated with afforestation.

The discipline-specific assessments undertaken in the EIAR have considered the realistic cumulative effect pathways associated specifically with replacement afforestation. These assessments identify 10km from the Proposed Wind Farm site as the maximum precautionary spatial extent within which cumulative effects associated with replacement afforestation could reasonably arise across the relevant terrestrial receptors. Potential effects on the water environment are not appropriately defined by radial distance and are instead dependent on hydrological connectivity and, where relevant, temporal overlap.

On a precautionary basis, the Applicant commits that, where replacement afforestation is required, the replacement afforestation lands will be located at least 10km from the Proposed Wind Farm site and will not be located where there is a hydrological pathway through which the afforestation works could give rise to cumulative effects with the Proposed Project. On this basis, it is reasonable to conclude that there will be no more than imperceptible in-combination cumulative effects associated with the replacement afforestation.

The 10km spatial criterion represents the maximum identified spatial extent within which cumulative effects associated specifically with replacement afforestation could reasonably arise, having regard to the principal pathways through which replacement afforestation could potentially interact cumulatively with the Proposed Project including changes to habitats and habitat availability, disturbance or changes in suitability for fauna and birds, landscape and visual change and effects on the water environment associated with afforestation establishment and drainage.

In addition, the Applicant commits to not commencing the Proposed Project until the required felling licence(s), and where replacement afforestation is required, the associated afforestation licence(s), are in place. This will ensure that any required replacement afforestation lands are identified, assessed and licenced appropriately by the relevant consenting authority.

Further details in relation to the consideration forestry replanting is included in Section 4.4.1.8.1 of the EIAR.

2.10.2.7 Land-Uses

Within the context of the cumulative study area for other plans and projects, the land-uses cover everything from agriculture to urban fabric. Land-use in the wider landscape of the Project Site comprises a mix of agriculture, peat cutting, quarrying, low density residential, public road corridor, and commercial forestry. The Proposed Project has been considered in combination with other land uses in the surrounding area, such as those identified above and within the cumulative study area.

2.10.3 Cumulative Impact Assessment Summary

The cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider all potential significant cumulative effects arising from relevant projects and land uses within the cumulative study area as detailed above. These include ongoing agricultural and third party / private peat extraction practices.

Overall, the Proposed Project has been designed to avoid and mitigate impacts on the environment, and a suite of mitigation measures is set out within the EIAR. A detailed cumulative impact assessment for each discipline within the EIAR is provided in each impact assessment chapter detailing the potential significant cumulative effects arising and, where appropriate, the specific suite of relevant mitigation measures proposed. The mitigation measures set out in this EIAR will ensure that significant cumulative effects do not arise during the construction, operational or decommissioning phases of the Proposed Project.