MKO Planning and Environmental Consultants

Planning Report

Ballydermot Wind Farm, Co. Offaly & Co. Kildare



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Table of Contents

1. EXECUTIVE SUMMARY 3
2. INTRODUCTION 5
   - 2.1 Report Definitions, Structure and Contents 5
3. PROPOSED PROJECT BACKGROUND 7
   - 3.1 The Applicant 7
   - 3.2 Site Location and Context 7
   - 3.3 Planning History 8
4. CONSULTATION 11
   - 4.1 EIAR Scoping 11
   - 4.2 Pre-Application Meetings 11
   - 4.3 Consultations with prescribed bodies, other public bodies, and relevant stakeholders 16
   - 4.4 Community Consultation 16
   - 4.5 Community Benefit Fund 18
5. PROPOSED PROJECT 19
   - 5.1 Proposed Project Description 19
   - 5.2 Proposed Project Design Process 23
6. LEGISLATIVE CONTEXT 34
   - 6.1 Planning and Development Act 2000 (as amended) 34
   - 6.2 Planning and Development Act 2024 (as amended) 35
   - 6.3 Climate and Renewable Energy Legislation 35
7. PLANNING POLICY CONTEXT 38
   - 7.1 International, National and Regional Policy 38
   - 7.2 Local Policy Context 49
8. PLANNING ASSESSMENT 123
   - 8.1 Strategic Need for the Proposed Project 123
   - 8.2 Compliance with Planning Policy 125
   - 8.3 Compliance with Legislation 125
   - 8.4 EIAR Findings 126
   - 8.5 NIS Findings 126
   - 8.6 Principle of Development 127
9. CONCLUSION 128

TABLE OF TABLES

Table 4-1: OCC Pre-Application Consultation Summary 11

Table 4-2: KCC Pre-Application Consultation Summary 12

Table 4-3: An Coimisiún Pleanála Pre-application Consultation Summary 14

Table 7-1 International, National & Regional Policy Objective and Compliance Summary Table 44

Table 7-2 Eastern and Midland Regional Assembly - Regional Economic & Spatial Strategy, Guiding Principles for Development on Peatland Areas 47

Table 7-3 Co. Offaly Local Policy Objective and Compliance Summary Table 52
Table 7-4 Offaly County Development Plan 2021-2027 Wind Energy Strategy Designation Areas 81
Table 7-5 Offaly County Development Plan 2021-2027 Wind Energy Development Management Standards 83
Table 7-6 Co. Kildare Local Policy Objective and Compliance Summary Table 89
Table 7-7 Kildare County Development Plan 2021-2027 Wind Energy Strategy Designation Areas 118
Table 7-8 Kildare County Development Plan 2023-2029 Wind Energy Development Management Standards 120

TABLE OF FIGURES

Figure 3-1 Site Location Context 10
Figure 5-1 Proposed Wind Farm Layout 21
Figure 5-2 Proposed Grid Connection Layout 22
Figure 5-3 Constraints and Facilitators Map 31
Figure 7-1 Local Authority Wind Strategy Areas Map - Proposed Wind Farm location 122

1. EXECUTIVE SUMMARY

The Proposed Ballydermot Wind Farm Development consists of 46 no. turbines and associated infrastructure at Ballydermot and surrounding townlands, on the border between Co. Offaly and Co. Kildare. The Proposed Project will also include 220kV grid connection infrastructure to connect the proposed Wind Farm to the national grid via loop-in from the existing Maynooth-Dunstown 220kV overhead line in the townland of Killybegs in Co. Kildare. The 46 no. proposed wind turbines comprise of 19 no. turbines with a blade tip height of 200m, and 27 no. turbines with a blade tip height of 220m. 28 no. turbines are located in Co. Kildare, and 18 no. turbines are located in Co. Offaly. The area of the Proposed Ballydermot Wind Farm Development application, delineated by the red line planning application boundary, is 5,157 hectares.

This application for the Proposed Project comprises Strategic Infrastructure Development and therefore, this planning application is being made under the provisions of Section 37E of the Planning and Development Act 2000, as amended, directly to An Coimisiún Pleanála. This Planning Report has been prepared in support of the planning application for the Proposed Project which is accompanied by an Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS).

Part of the Project Site was formerly subject to commercial peat extraction, which ceased in June 2020. 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. The substitute consent application includes all areas of where historical industrial peat extraction occurred within the Project Site. Current activities onsite include, natural revegetation, site management, decommissioning works and environmental monitoring as required under Integrated Pollution Control (IPC) Licence P0503-01 issued by the Environmental Protection Agency (EPA).

The introductory sections of this Planning Report provide an overview of the Proposed Project, the Applicant, the site location and context, the site's planning history and a summary of consultation undertaken. The design process is outlined, demonstrating the rationale for the site's selection and its suitability for wind energy development. The iterative design process outlines the design stages from the initial design to the final design iteration. Each design iteration responded to the specific constraints on the site, as they were identified by site surveys and detailed analysis.

The Proposed Project is strongly supported by European and national policy and legislation on renewable energy. At a European level, the Proposed Project is supported by the European Union Renewable Energy Directive and REPowerEU. At a national level, the Proposed Project is supported by the National Planning Framework First Revision, Climate Action Plan 2025, the National Energy Security Framework, among other national climate and renewable energy policies. The legally binding greenhouse gas emission reduction target and the obligations of public bodies under the Climate Action and Low Carbon Development Act 2015, as amended, should also be considered in the assessment of this application. At a local level, the Proposed Project is supported by climate and renewable energy policies as set out in the Offaly County Development Plan 2021-2027 (OCDP) and the Kildare County Development Plan 2023-2029 (KCDP). A full appraisal of the relevant policy and legislation is provided in **Section 6** and **Section 7** of this Planning Report.

The development of viable sites for wind energy development is essential to meet European, national, regional and local climate and renewable energy targets. Ireland needs to scale up onshore wind energy development at an unprecedented rate to achieve its 9GW and 80% renewable energy share targets, as set out in the Climate Action Plan 2025. The reality of achieving these targets is the installation of over 800 Megawatts (MW) of wind energy per year until 2030. If permitted, the Proposed Project will generate and provide approximately 322 MW of clean and sustainable renewable wind energy to Ireland's national electricity grid and national renewable energy capacity. This will not only contribute to the decarbonisation of the electricity sector but will play a role in the decarbonisation of other sectors and the transition to a sustainable and climate-resilient economy and society.

To conclude, it is submitted that, based on the evidence provided in this Planning Report, the Proposed Project is strongly supported by European, national, regional and local planning policy and will significantly contribute to the achievement of national and local climate and renewable energy targets. The Proposed Project will also support Ireland's energy security by generating and increasing indigenous renewable wind energy, which will reduce Ireland's reliance on imported fossil fuels for energy generation. Ultimately, it is submitted that the Proposed Project is in accordance with principles of proper planning and sustainable development.

2. INTRODUCTION

This Planning Report has been prepared by MKO on behalf of Bord na Móna Powergen Ltd. (BnM) (the Applicant), to accompany a Strategic Infrastructure Development (SID) planning application to An Coimisiún Pleanála (the Commission, ACP) under Section 37E of the Planning and Development Act 2000, as amended (the Planning Act). The Proposed Project falls within the definition of a 'renewable energy development' and is therefore covered by the provisions of the Renewable Energy Directive III (Directive 2023/2413) (RED III).

The Proposed Project comprises a renewable energy development of 46 no. wind turbines, 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. Part of the Project Site (i.e., the Proposed Wind Farm site) is located on a part of the Allen Bog Group which comprises 14 no. bogs on the border of Co. Offaly and Co. Kildare.

The Proposed Project falls within the definition of a 'renewable energy development' and is therefore covered by the provisions of RED III. The planning application is subject to a completeness check under Section 37JA of the Planning Act by the European Union (Planning and Development) (Renewable Energy) Regulations 2025.

2.1 Report Definitions, Structure and Contents

For the purposes of this Report and as set out in **Chapter 1** of the Environmental Impact Assessment Report (EIAR), the Proposed Project will be referenced as follows:

- Where the 'Proposed Project' is referred to, this encompasses the entirety of the project ('Proposed Wind Farm' and 'Proposed Grid Connection' as described below) for the purposes of this Environmental Impact Assessment (EIA) in accordance with the EIA Directive. The Proposed Project is described in detail in **Chapter 4** of the EIAR.
    - The 'Proposed Enhancement Areas' refers to the areas of the Project Site containing the proposed biodiversity and ornithology management areas for offsetting and enhancement as detailed in **Appendix 6-5** (Biodiversity Management Plan (BMP)) and in **Section 4.4.3** of **Chapter 4**.
    - The 'Proposed Construction Haul Routes' refers to the construction material haul routes proposed to facilitate the construction of the Proposed Project as detailed in **Section 4.5.2** in **Chapter 4** and further detailed in **Section 15.1** of **Chapter 15**.
    - The 'Proposed Turbine Delivery Route' refers to the turbine delivery route and associated accommodation works areas as detailed in **Section 4.5.2** in Chapter 4 and further detailed in **Section 15.1** of **Chapter 15**
- Where the 'Project Site' is referred to, this relates to the Planning Application Boundary, as delineated in red, which identifies the area in which the Applicant is applying for planning permission, as shown on **Figure 1-1** and **Figure 1-2** of the EIAR and encompasses an area of approximately 5,157 hectares.
- Where the 'Proposed Wind Farm' is referred to, this refers to the 46 no. turbines and associated foundations and hardstanding areas, including access roads, underground internal cabling, permanent meteorological masts, temporary construction compounds, peat and spoil areas, relay mast, tree felling, site drainage, operational stage signage, and all ancillary works and apparatus.
    - The 'Proposed Turbines' refers to the 46 no. turbines associated with the Proposed Wind Farm as outlined above.
- Where the 'Proposed Grid Connection' is referred to, this refers to the Proposed Onsite Substation (described below), the Proposed Offsite Substation (described below), the 13.1km

220kV underground cabling connection from the Proposed Onsite Substation to the Proposed Offsite Substation, and overhead line (OHL) connecting to the existing Maynooth-Dunstown 220kV OHL, and all ancillary works and apparatus. The Proposed Grid Connection is described in detail in **Chapter 4** of this EIAR.

- The 'Proposed Onsite Substation' refers to the new proposed onsite electricity infrastructure proposed within Lodge Bog, Co. Kildare comprising one 220kV Gas-Insulated Substation (GIS) building, and one 110kV GIS building, one control building, a 36m telecommunications tower, and the electrical components necessary to consolidate the electrical energy generated by each wind turbine and export that electricity from the wind farm to the national grid.
- The 'Proposed Offsite Substation' refers to new proposed offsite electric infrastructure proposed within Killybegs, Co. Kildare comprising one 220kV GIS building, one 36m telecommunications tower, 2 no. steel masts, 2 no. new gantry structures and the associated outdoor electrical equipment necessary to consolidate the grid connection.

This Planning Report is structured as follows:

- **Introduction —** Introduction to the Applicant, the Proposed Project, the application documents and the summary of the report findings.
- **Project Background** – Outlines the strategic need for the Proposed Project, the site and its current land use and planning history.
- **Consultation** – EIAR scoping, pre-application and community consultations details
- **Proposed Project** – Description of the main elements of the Proposed Project subject to this Section 37E planning application along with the design process from site selection through to the final design.
- **Legislative Context**: Requirements under the Planning Act, along with an overview of the legislative framework for renewable energy and climate action.
- **Planning Policy Context** – Review and evaluation of the Proposed Project against European, national, regional, and local policy.
- **Planning Assessment** – Evaluation of the Proposed Project against the relevant policy and legislative requirements.

3. PROPOSED PROJECT BACKGROUND

3.1 The Applicant

The applicant for the Proposed Project is Bord na Móna Powergen Ltd. a subsidiary of Bord na Móna plc trading as BnM.

BnM is an Irish, semi-state climate solutions company helping lead Ireland towards a climate neutral future. Bord na Móna was founded in 1934 and was known as The Turf Development Board, with a remit to enhance national energy security through peat harvesting and to develop and manage some of Ireland's extensive peat resources on an industrial scale, in accordance with government policy at the time. The Turf Development Board became Bord na Móna in 1946.

In January 2021, the company announced its decision to permanently end all peat extraction in line with its change from a traditional peat business into a climate solutions company fully focused on renewable energy generation, peatlands restoration and the development of new low carbon enterprises. Ireland has committed to ambitious climate goals, and BnM's climate solutions are helping to achieve them. BnM's vision is to help Ireland reach net zero greenhouse gas emissions by 2050.

Today, BnM's lands extend to approximately 80,000 hectares in total and are located mainly in the Irish midlands. BnM currently manages and operates a portfolio of thermal and renewable assets, namely Edenderry Power Plant, Cushaling peaking plant, the Drehid landfill gas facility, Oweninny Wind Farm Phase 1 and Phase 2 in County Mayo, Sliabh Bawn Wind Farm in County Roscommon, and Bruckana Wind Farm situated on the borders of counties Tipperary, Kilkenny and Laois, Derrinlough, Mountlucas and Cloncreen Wind Farms in County Offaly and Timahoe North Solar Farm in County Kildare.

To power a net zero future, BnM are expanding its renewable energy infrastructure. Although they have been constructing and maintaining large-scale infrastructure for decades, the company is now using that experience to build renewable energy developments across the country. BnMs ambition is to build a 5GW renewable energy pipeline, including wind, solar, biomass and biogas projects, safeguarding renewable energy supply, enabling industrial growth and contributing to a sustainable future. These developments are transforming the way the nation generates and consumes energy. Ireland has committed to generating 80% of electricity from renewable sources by 2030 and BnM is working across wind, solar, biomass and biogas to help achieve this target and to provide energy security for future generations.

3.2 Site Location and Context

The Proposed Wind Farm is located approximately 2.2km south-southeast of Edenderry Co. Offaly, 3.3km west of Allenwood Co. Kildare, 2km north of Rathangan Co. Kildare and 1.7km east of Clonbullogue Village Co. Offaly. The Proposed Wind Farm, Proposed Enhancement Areas, Proposed Onsite Substation and 0.5km of the Proposed Grid Connection underground electrical cabling route will be located on part of the Allen Bog Group which comprises 14 no. bogs (i.e., the Proposed Wind Farm site) and located on the border of County Offaly and County Kildare. The bogs include: Ticknevin, Glashabaun North, Glashabaun South, Codd 1, Codd 2, Ballydermot North, Ballydermot South, Blackriver, Lullymore, Lullybeg, Barnaran, Killina, Derrybrennan and Lodge. The Proposed Grid Connection will traverse through Allenwood, Co. Kildare and Prosperous, Co. Kildare, with infrastructure proposed in the townland of Lullymore and Killybegs, Co Kildare and adjacent townlands.

The Proposed Grid Connection will facilitate the connection of the Proposed Turbines to the national electricity grid. Underground electrical cables will transmit the power from each wind turbine to the Proposed Onsite Substation. The Proposed Onsite Substation will connect to the Proposed Offsite

Substation via 13.1 km of underground 220 kV electrical cabling which will be primarily located in the public road network, with two subsections (0.5 km and 1 km) located in private land. The Proposed Offsite Substation will connect into the national grid via the existing Maynooth-Dunstown 220kV Overhead Line (OHL) in the townland of Killybegs, Co. Kildare, measuring approximately 0.12km in total length (comprising 0.06km of OHL loop-in from the Proposed Offsite Substation to the existing OHL). Access to the Proposed Onsite Substation will be via a new entrance off the R414 regional road, Site Entrance 6L, during the construction and operational phases. The Proposed Offsite Substation and associated OHL cabling infrastructure will be accessed via a proposed new entrance off the L6002 near Prosperous Co. Kildare. Please see **Section 4.5** of **Chapter 4** Description of the Proposed Project for further information on Project Site access.

Current land use within the Proposed Wind Farm site comprises natural revegetation of cutaway and degraded bog, a small area of active turbary, and public road corridor. Current land use on and along the Proposed Grid Connection (excluding the Proposed Onsite Substation) comprises degraded raised bog, land principally used for agriculture, and public road corridor. Land use associated with the Proposed Enhancement Areas includes natural revegetation of cutaway and degraded bog and forestry. Land-use in the wider landscape of the Project Site comprises of BnM landholdings, forestry, agricultural land, cutover and cutaway peatland, peatland rehabilitation, one-off rural housing, small village settlements, and existing energy infrastructure, including power plants, solar farms, and wind energy developments.

The Project Site is located within an area designated as 'Open for Consideration' for wind energy in the Kildare County Development Plan 2023-2029 and 'Areas Open for Consideration for wind energy development' in the Offaly County Development Plan 2021-2027. All Proposed Turbines are within the 'Open for Consideration' wind energy designation for both Offaly and Kildare. Please see **Section 7.2** below for further information on both the OCDP and KCDP wind energy designations.

A Site Location Context Map is shown in **Figure 3-1**.

3.3 Planning History

A planning search was carried out through the Offaly County Council (OCC) and Kildare County Council (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 relevant planning applications are outlined in **Section 2.7.1** of **Chapter 2** of the EIAR. In total, 10 no. 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 Proposed Wind Farm site was subject to industrial scale peat extraction which permanently ceased in June 2020. The proposed wind farm site is continuing to be managed as per the requirements of the IPC licence (Ref. P0503-01) as detailed in Chapter 4 section 4.6.7.

A planning search was also 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 also included. These are outlined in greater detail in **Table 2-3** of **Chapter 2** of the EIAR.

These are summarised below:

- Cushaling Wind Farm (Operational)– 0.71km south of the proposed turbine T25
- Cloncreen Wind Farm (Operational) – 2.85km west of the proposed turbine T22
- Ballinla Wind Farm (Permitted) – 7.29km northwest of the proposed turbine T22
- Drehid Wind Farm (Proposed) – 7.44km northeast of the proposed turbine T46

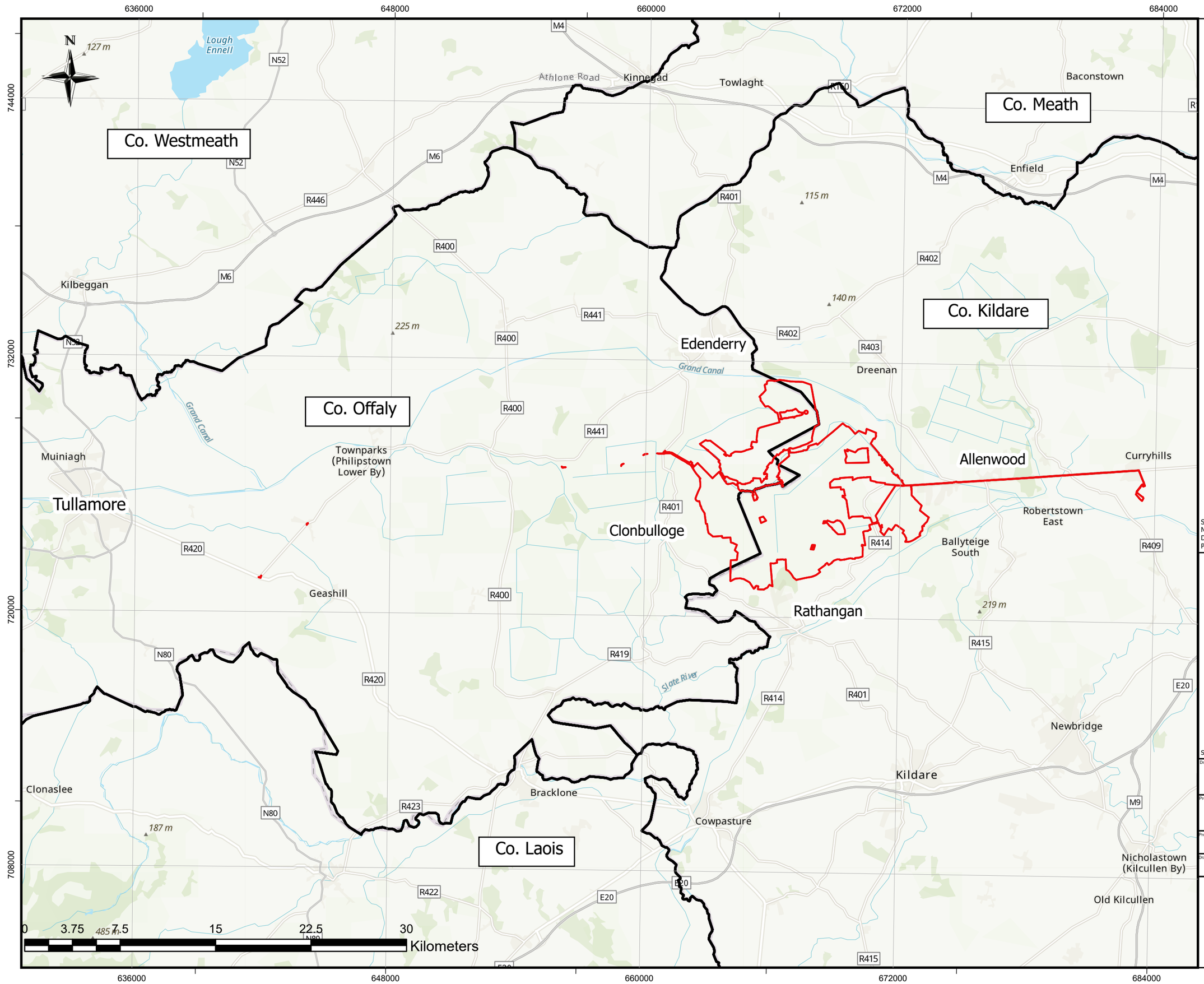
- Derrynadarragh Wind Farm (Proposed) – 7.66km southwest of the proposed turbine T14
- Cushina Wind Farm (Proposed) – 9.3km southwest of the proposed turbine T13
- Mountlucas Wind Farm (Operational) – 10.37km west of the proposed turbine T22
- Yellow River Wind Farm (Operational) – 12.11km northwest of the proposed turbine T32
- Clonarrow Wind Farm (Permitted) – 12.91km west of the proposed turbine T22
- Moanvane Wind Farm (Operational) – 13.87km southwest of the proposed turbine T13
- Garryhinch Wind Farm (Proposed) – 20.01km southwest of the proposed turbine T13
- Ballivor Wind Farm (Permitted) – 21.30km north of the proposed turbine T32
- Dernacart Wind Farm (Permitted) – 22.3km southwest of the proposed turbine T13
- Kilberry Wind Farm (Pre-application) – Public Domain

3.3.1 Substitute Consent Application for Extraction in Ballydermot Bog (Case Ref: SU09.324604)

An application for substitute consent was submitted by BnM to ACP (Case Ref: SU09.324604) on 20th August 2026 for peat extraction and ancillary works from July 1988 that have been carried out on part of the Allen Bog Group. A Remedial Natura Impact Statement (rNIS) and Remedial Environmental Impact Assessment Report (rEIAR) were submitted as part of the substitute consent application. The substitute consent application includes all areas where historical commercial peat extraction occurred on part of the Allen Bog Group, in which the Project Site is located. The rEIAR and rNIS describe these activities in detail and in particular describe the activities that are intended to be carried out on the Project Site into the future (i.e. the 'Remedial Phase').

BnM was granted an Integrated Pollution Control Licence (IPC) Licence (Ref. P0503-01) for industrial peat extraction activities from the EPA for the Allen Bog Group, in May 1999, within which the Proposed Wind Farm site and associated infrastructure is located. Current activities onsite include site management, decommissioning works, and environmental monitoring as required under the IPC Licence. These activities do not facilitate the continuation of peat extraction but instead ensure compliance with BnM's IPC Licence. In January 2021, BnM formally announced that peat extraction across all bogs within its landholding had ceased, although peat extraction was permanently ceased by BnM in the Allen Bog Group[1] in June 2020. BnM's statutory duties to discharge the conditions of its IPC Licence remains on-going.

[1] *The Proposed Wind Farm site is within part of the Allen Bog Group and comprises of the following 14 no. bog units Ticknevin, Glashabaun North, Glashabaun South, Codd 1, Codd 2, Ballydermot North, Ballydermot South, Blackriver, Lullymore, Lullybeg, Barnaran, Killina, Derrybrennan and Lodge Bogs, located in Counties Kildare and Offaly which is a total of 5,139 ha. The Allen Bog Unit comprises a total of 30no. bog units in total with a total area of 18,235 ha.*

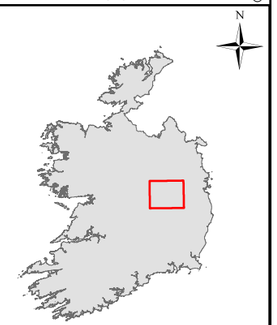


Legend

- Project Site
- County Boundaries

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
Site Location Context

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

Project No.	Drawing No.	Scale
250708	3-1	1:270,000
Drawn By	Checked By	Date
TI	CJ	08/10/2026

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4. CONSULTATION

This section of the Planning Report outlines the pre-application consultation undertaken by the Applicant for the Proposed Project. This includes scoping as part of the EIAR, pre-application meetings with the relevant planning authorities, consultation with relevant bodies and organisations, and extensive consultation with the local community.

4.1 EIAR Scoping

MKO requested the comments of the relevant personnel/bodies in their respective capacities as consultees with regard to the EIAR process. As part of the constraints mapping process, telecommunications operators were contacted by MKO in July 2020 and again in May 2025 by Ai Bridges in order to determine the presence of telecommunications links either transversing the site or in close proximity to the Project Site.

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 (as listed in **Table 2-4** of **Chapter 2** of the EIAR) 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 updates and changes were reflected in the updated scoping document, and consultees were invited to contribute again to the EIAR.

Copies of all scoping responses received are included in **Appendix 2-1** of the EIAR. The recommendations of the consultees have informed the scope of the assessments undertaken and the contents of the EIAR.

4.2 Pre-Application Meetings

4.2.1 Offaly County Council

Two pre-planning meetings were held with attendees from various departments of Offaly County Council (OCC).

The pre-planning consultation meetings are summarised in **Table 4-1** below. Further detail is provided in relation to each meeting in **Section 2.9.1** in **Chapter 2** of the EIAR.

Table 4-1: OCC Pre-Application Consultation Summary

Meeting Details	Matters Discussed
01st April 2021 Online via MS Teams	› 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.
22nd July 2026 Online via MS Teams	› Impact of construction traffic on structural condition of existing roads network. › Traffic Management Plan (TMP) and Construction and Environmental Management Plan (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 Landscape and Visual Impact Assessment (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. Confirmed that construction is anticipated to commence in 2030, as mentioned in the EIAR, 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.

4.2.2 Kildare County Council

Two pre-planning meetings were held with attendees from various departments of Kildare County Council (KCC).

The pre-application consultation meetings are summarised in **Table 4-2** below. Further detail is provided in relation to each meeting in **Section 2.9.2** in **Chapter 2** of the EIAR.

Table 4-2: KCC Pre-Application Consultation Summary

Meeting Details	Matters Discussed
13th April 2021 Online via MS Teams	› 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.
16th September 2026 Online via MS Teams	› 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.

4.2.3 An Coimisiún Pleanála

Four pre-application consultation meetings were held under Section 37B of the Planning Act with ACP (Pre-planning ref: 310143-21). Feedback and recommendations from ACP regarding the environmental impact assessment and the preparation of the application were considered and incorporated into the application documents where appropriate.

The pre-application consultation was closed by ACP in accordance with Section 37B(4)(a) of the Planning Act in a letter dated 12th October 2026. This confirmed that the Proposed Project constitutes SID and therefore the planning application should be made directly to ACP under Section 37E of the Planning Act.

The pre-application consultation meetings are summarised in **Table 4-3** below. Further detail is provided in relation to each meeting in **Section 2.9.3** in **Chapter 2** of the EIAR.

Table 4-3: An Coimisiún Pleanála Pre-application Consultation Summary

Meeting Details	Matters Discussed
26th July 2021 Online via MS Teams	› 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 that recent wind farm cases subject to judicial review be considered.
10th March 2026 Online via MS Teams	› 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.
12th June 2026 Online via MS Teams	› Forward baseline assessment and future trends. › Confirmed that Peatland Climate Action Scheme (PCAS) is substantially complete at Lodge Bog. › Trim Groundwater Body (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. › Clearly differentiate 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. › Finalization of habitat loss calculations and enhancement measures. › Discussion on Whooper Swan and Hen Harrier. Consultation with NPWS confirmed. › 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.
28th August 2026 Online via MS Teams	› 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

4.3 Consultations with prescribed bodies, other public bodies, and relevant stakeholders

Consultations throughout the project design phase took place with various prescribed bodies, public bodies, and relevant stakeholders. Consultation details are provided below.

- OCC Roads Department: 4th September 2025
- KCC Roads Department: 22nd August 2025, 3rd September 2026
- National Parks and Wildlife Service: 26th May 2026
- Department of Defence: 19th May 2026
- EirGrid and ESB Networks: 16th December 2025
- Inland Fisheries Ireland: 5th October 2026
- Butterfly Conservation Ireland, Irish Peatland Conservation Council (IPCC) and Lullymore Heritage Park: 23rd February 2023

Further details of the consultations are provided in Section 2.9.4 of Chapter 2 of the EIAR.

4.4 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 the 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.

4.5 Community Benefit Fund

The Community Engagement Report at Appendix 2-2 of the EIAR also outlines potential short- and long-term economic benefits, including construction and operational employment, commercial rates, recreational facilities and a Community Benefit Fund. Based on assumed annual electricity generation of 823,650MWh and a contribution rate of €2/MWh, the report estimates an indicative Community Benefit Fund value of approximately €24 million over the first 15 years of operation. This estimate is subject to planning consent, a final investment decision, actual generation and the applicable funding requirements. Further details of the community benefit fund is provided in the Community Engagement Report.

5. PROPOSED PROJECT

5.1 Proposed Project Description

This section describes the Proposed Project.

The development description for the current planning application as it appears in the public notices is as follows:

(i) *46 no. wind turbines and 2 no. meteorological masts with a height of 40m, and subsequent decommissioning of the wind turbines and meteorological masts, following a thirty five-year operational life from the date of full commissioning of the wind turbines. The 46 no. wind turbines (18 no. located in Co. Offaly, 28 no. located in Co. Kildare) comprise:*
   - *a. 19 no. wind turbines with turbine tip height of 200m, hub height of 115m, and blade rotor diameter of 170m; and*
   - *b. 27 no. wind turbines with turbine tip height of 220m, hub height of 135m, and blade rotor diameter of 170m.*

(ii) *Turbine and meteorological mast foundations, hard-standing and assembly areas;*

(iii) *Underground electrical and communications cabling connecting the proposed turbines and meteorological mast to the proposed 220kV onsite electrical substation;*

(iv) *An onsite electrical substation compound (c. 25,615m^2) in the townland of Lullymore East, Co. Kildare, consisting of 1 no. 220kV Gas-Insulated Substation (GIS) building (75m x 22m, with a height of 24m), 1 no. 110kV GIS building (51m x 15.88m, with a height of 16.5m), 1 no. Independent Power Producer (IPP) control building (44.4m x 12.8m, with a height of 7.1m), all associated electrical and communications plant and equipment, access roads, security fencing and gates, lightning masts, signage, landscaping, drainage infrastructure and all other ancillary works;*

(v) *An offsite electrical substation compound (c. 9,307m^2) in the townland of Killybegs, Co. Kildare consisting of 1 no. 220kV GIS building (75m x 22m, with a height of 24m), 2 no. new gantry structures and ancillary apparatus, access roads, security fencing and gates, lightning masts, signage, landscaping, drainage infrastructure and all other ancillary works;*

(vi) *All works associated with the connection of the wind farm to the national electricity grid, including underground electrical (220kV) grid connection cabling, c. 18 no. joint bays, communication chambers and earth sheath links extending for c. 13.1 km primarily located in the public road corridor connecting the proposed onsite substation to the proposed offsite substation, and all associated site development and reinstatement works;*

(vii) *A 220kV loop-in grid connection at the offsite substation consisting of c. 120m of new overhead line (OHL) and the decommissioning / removal of 65m of existing OHL, 2 no. new steel masts, temporary tower build areas and crane pads, and associated hard-standing areas to facilitate the connection into the existing 220kV Maynooth–Dunstown 220kV OHL in the townland of Killybegs, Co. Kildare;*

(viii) *2 no. telecommunications towers with a height of 36m and 1 no. relay telecommunication mast with a height of 60m and associated foundations and hard-standing areas;*

(ix) *The upgrade of c.2.8km of existing internal site roads/tracks and the provision of c.60km of new internal site access roads, passing bays, layby areas and set down areas;*

(x) *The provision of c.14.4km of new tracks and c.844m of boardwalk for the purposes of amenity, seating areas, and amenity signage;*

(xi) *Upgrade to 4 no. existing site entrances (1 no. site entrance on R401 regional road, 1 no. site entrance on L3001 local road, 2 no. site entrances on R414 regional road)*

(xii) *8 no. new site entrances (3 no. site entrances on L3001 local road, 3 no. site entrances on L1001 local road, 1 no. site entrance on R414 regional road, 1 no. site entrance on L6002 local road);*

(xiii) *Widening and upgrade of wind farm access roads within the existing Cloncreen Wind Farm to facilitate the delivery of turbine components and other abnormal loads;*

(xiv) *Temporary works between the R420 regional road to R402 regional road at Ballina Co. Offaly and along the R402 at Ballingar, Co. Offaly to facilitate the delivery of turbine components and other abnormal loads;*

(xv) *10 no. temporary construction compounds with temporary offices, containers and staff facilities;*

(xvi) *4 no. permanent amenity car parks comprising 132 no. spaces for private vehicles, 12 no. spaces for accessible parking, parking for buses and bicycle rack facilities;*

(xvii) *10 no. temporary Security Cabins;*
(xviii) *Watercourse crossings;*
(xix) *Peat and Spoil Areas;*
(xx) *Site Drainage;*
(xxi) *Tree felling and vegetation removal;*
(xxii) *Biodiversity mitigation and enhancement measures;*
(xxiii) *Operational stage site signage; and*
(xxiv) *All ancillary apparatus and site development works above and below ground, including hard and soft landscaping and drainage infrastructure.*

The applicant is seeking a 10-year planning permission for the development and 35-year operational life from the date of commissioning of the renewable energy development.

The Proposed Wind Farm will have a generating capacity of approximately 322MW. A full description of the Proposed Project is provided in **Chapter 4** of the EIAR. The Proposed Wind Farm and Proposed Grid Connection layouts are illustrated in **Figure 5-1** and

Figure 5-2 respectively.

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

0 1 2 4 6 8
Kilometers

672000

Legend

- Project Site

Proposed Turbine Layout

- 220
- 200
- Proposed Met Mast
- Proposed Telecommunications Tower
- Internal 33kV Cable Trench
- Proposed Internal 33kV Cabling
- Proposed Grid Connection Underground 220kV electrical cabling
- Temporary Construction Compounds
- Proposed Peat and Spoil Areas
- Proposed Security Hut
- Proposed Car parking
- Proposed Set Down Area
- Proposed Internal Access Road
- Upgrades to Existing Road
- Proposed Turning Bay
- Proposed Dedicated Amenity Track
- Proposed Dedicated Amenity Board Walk
- Proposed Dedicated Amenity Equestrian Track

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

SITE LOCATION - NOT TO SCALE

Drawing Title
Proposed Wind Farm Layout

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

Project No.	Drawing No.	Scale
250708	5-1	1:70,000
Drawn By	Checked By	Date
TI	CF	08/10/2026

Email: info@mkoireland.ie/ Website: www.mkoireland.ie

672000

684000

N

Hodgestown (Clane By)

Coolearagh East

gh Lower

Curryhills

Blackwood (Clane By)

Allenwood North

Allenwood Middle

Allenwood South

Prosperous

Downings North

R403

R414

R415

R409

Derrymullen

Lowtown (Connell By)

Robertstown East

Grangeclare West

Ballyteige South

Kilmeage

0 0.75 1.5 3 4.5 6

Kilometers

Legend

- Project Site
- Proposed Telecommunications Tower
- Joint Bays
- Internal 33kV Cable Trench
- Proposed Internal 33kV Cabling
- Proposed Grid Connection Underground 220kV electrical cabling
- Temporary Construction Compounds
- Proposed Offsite Substation Tower Build Area
- Proposed Offsite Substation Crane Pad
- Proposed Onsite 110kV GIS Substation
- Proposed Onsite 220kV GIS Substation
- Proposed Offsite 220kV GIS Substation
- Proposed Internal Access Road

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
Proposed Grid Connection Layout

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

Project No.	Drawing No.	Scale
250708	5-2	1:60,000
Drawn By	Checked By	Date
TI	CJ	08/10/2026

Email: info@mkoireland.ie/ Website: www.mkoireland.ie

5.2 Proposed Project Design Process

The design of the Proposed Wind Farm has been an informed and collaborative process from the outset, involving the project designers, developers, engineers, landowners, environmental, hydrological, geotechnical, archaeological and traffic specialists. The design process has also taken into account the recommendations and feedback from the relevant statutory and non-statutory organisations, local community and local authority where relevant.

The aim of the process is to reduce the potential for environmental effects while designing a commercially viable project capable of being constructed and connected to the national grid.

Throughout the design process, the layout of the Proposed Wind Farm has been revised and refined to take account of the findings of all desk-based assessments, site surveys, investigations and baseline assessments which have brought the design from its initial layout to the current Proposed Wind Farm layout.

5.2.1 Strategic Site Selection

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

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

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

BnM's Brown to Green strategy was officially launched around 2018, as part of a major shift away from peat-based operations toward renewable energy, climate solutions, and sustainable resource management. BnM is now fully focused on renewable energy generation and the development of other low carbon enterprises. One of the key outputs of this launch was BnM's official decarbonisation strategy. Key points of the company's decarbonisation plan include:

- 75% of energy generated by the company will be renewable by 2020, up from 10% in 2010.
- Development of new businesses to support the low carbon economy in development. Identified potential to create 400-500 jobs across the Midlands in the medium term.
- Accelerated development of renewable energy assets. Providing up to 2GW of generating assets by 2030.
- Steep increase in the supply of greenhouse-gas neutral biomass replacing peat to the three Midlands power stations.

An immediate steep reduction in peat volumes down from a recent high of 6.5 million tonnes(mt) in 2013 to 2mt in 2020. Fast-tracking peat reduction and cessation will carry a significant associated reduction in carbon emissions.

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

> *"Harnessing the potential of the region in renewable energy terms 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 enable a managed transition of the local economies of such areas in gaining the economic benefits of greener energy."*

The first revision of the NPF[2], published in April 2025, updates the key future planning and development and place-making policy priorities for the Eastern and Midland Region, including:

> *"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"*

Consequently, when considering suitable locations for the Proposed Project in 2019, the assessment was confined to lands within the Applicant's landholding only, as these lands have been identified in a national and regional context as being suitable for this type of development. An examination of sites outside of this landholding was not included as part of the process.

The assessment carried out for the determination of a suitable location for the Proposed Project was a two-stage process. The first stage comprised the identification of a number of candidate sites while the second stage comprised a site-specific assessment. Each of these stages are described in the following sections.

In order to identify candidate sites, i.e., sites considered suitable for wind energy development, the Applicant conducted a technical review of peatlands which are either cut away or cutover within their landbank. This involved desk studies and on-site surveys of the landbank. Known constraints were then applied across the landbank. The constraints applied were derived from various industry and regulatory guidelines, available Geographical Information Systems (GIS) datasets and on-site surveys (carried out as part of the peat extraction activity), and included the following:

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

The aim of the site-specific assessments was to gauge the sites with the best potential to deliver a successful wind farm project by the end of this decade, i.e., 2025 - 2030. The goal was to select a project to bring forward, for which preliminary engineering designs and a planning application could be prepared.

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

[2] *National Planning Framework First Revision (April 2025)* https://cdn.npf.ie/wp-content/uploads/National-Planning-Framework-First-Revision-April-2025-1.pdf

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

Key criteria were selected for the site-specific assessment, which not only covered the broad range of issues which can arise from wind farm development but also allowed for direct comparison between candidate sites to determine their relative suitability. The site-specific selection criteria and an outline of the basis for assessment for each criterion are listed in Table 3-2 in Chapter 3 of the accompanying EIAR. To facilitate the selection process, greater emphasis was placed on certain criteria viewed as critical to site suitability, including environmental sensitivity, grid access/capacity, county development plans and zoning, and proximity to houses.

The criteria can be regarded as either a constraint to the Proposed Project or a facilitator for the Proposed Project. For example, the level of flooding at the site may reduce the available 'buildable' area or the lack of flooding may highlight the suitability of the site. The environmental effect of significant flooding may arise due to a requirement for deeper and more extensive drainage leading to potential downstream surface water impacts. In the case of the Applicant's lands, the existing onsite drainage is a facilitator to the project as surface water is already managed in accordance with the EPA-administrated IPC licence.

The findings of the site-specific assessment process, which included a comparison of the site selection criteria and potential environmental effects, are provided in **Section 3.2.3.3** of **Chapter 3** of the EIAR.

5.2.1.1 Suitability of the Proposed Wind Farm site

Of the sites assessed, the proposed 14no. bog units within part of the Allen Bog Group, were selected as a site with relatively low potential for environmental effects similar to a number of the other sites on the list that met the relevant criteria. Due to, for instance, the low landscape sensitivity, and compatibility with local wind energy zoning policy, it was deemed that the Project Site should be progressed for detailed assessment and planning consideration.

It is noteworthy that the process described in the preceding paragraphs is not a one-off assessment of the entire BnM landholding in terms of its suitability for renewable energy developments. The site selection process is revisited in its entirety for each individual project and the criteria updated to suit the technology type proposed and to take account of any changes that have occurred (i.e., policy, legislative, environmental, etc.) since the previous site selection process was conducted.

The application of the above criteria resulted in the selection of a number of BnM Bogs for candidate wind farm sites, including the Project Site at Ballydermot and adjacent townlands, which is the subject of the present application.

Planning Policy Context

The Project Site falls across the administrative area of OCC and KCC and therefore, is subject to the planning policies and objectives set out in the OCDP and KCDP.

County Offaly's Wind Energy Strategy[3] (WES) identifies areas within the County according to a hierarchy from the most optimal down to areas not generally considered suitable. There are two categories within the WES:

- Open for Consideration for Wind Energy development

[3] *Offaly County Development Plan 2021-2027* https://www.offaly.ie/app/uploads/Combined-Copy.pdf

- Not deemed Suitable for Wind Energy Development

The proposed turbines are located within an area designated as ***'Areas Deemed Open for Consideration for Wind Energy Developments'*** in the County Offaly WES.

County Kildare's WES[4] identifies areas within the County according to a hierarchy from the most optimal down to areas not generally considered suitable. There are three categories within the WES:

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

The proposed turbines are located within an area designated as ***'Open for Consideration'*** in the County Kildare WES.

A detailed site-specific constraints assessment has been undertaken as part of the design process (see **Chapter 3** of the EIAR, **Section 3.2.5**) which demonstrates that this area of the Project Site is a suitable location for a wind energy development. **Table 3-2** and **Table 3-3** of **Chapter 3** of the EIAR presents the findings of the site-specific assessment for the Proposed Project and the basis for assessment and potential environmental effects associated with each of the key site selection criteria. Please see **Section 7.2** below and **Section 2.6.4** of **Chapter 2** of the EIAR for further information on the OCDP, County Offaly WES, KCDP and County Kildare WES.

Proximity to Sensitive Residential Receptors

The Applicant sought to identify an area with a relatively low population density. Having reviewed the settlement patterns in the vicinity, the Population Study Area (defined in **Section 5.2.1.1** of **Chapter 5**) has emerged as suitable to accommodate the Proposed Project. The population density of the Population Study Area in 2022 as described in **Chapter 5** of the EIAR is 64.43 persons per square kilometre. This is lower than the national population densities of 73.27 persons per square kilometre and considerably lower than the population density of County Kildare, recorded at 146.26 persons per square kilometre. The density of the Population Study Area is greater than that of Co. Offaly, recorded at 41.55 persons per square kilometre.

Similar to the observed population trends, the population density recorded across the Population Study Area varies between Electoral Divisions (EDs). Rathangan ED, which includes Rathangan town, had the highest population density at 223 persons per square kilometre while Lullymore ED, closely representative of the Proposed Wind Farm site, had the smallest population density at just 9.6 persons per square kilometre.

The proposed turbine positions achieve the recommended setback of 4 times tip height from residential properties (880m based on the 220m tip height applied) identified in the Draft Wind Energy Development Guidelines 2019 (Draft WEDG 2019), while also exceeding the minimum 500 m setback from sensitive receptors recommended under the Wind Energy Development Guidelines 2006 (WEDG 2006).

Application of the four times tip height setback across the Proposed Wind Farm site demonstrates that approximately 3394 ha of land remains available outside this residential amenity constraint. This is a substantial proportion of the site and demonstrates that the site has considerable capacity to accommodate wind energy development while maintaining appropriate separation from residential receptors.

[4] *Kildare Wind Energy Strategy* https://kildarecoco.ie/AllServices/Planning/DevelopmentPlans/KildareCountyDevelopmentPlan2023-2029/Appendices/2.%20Wind%20Energy%20Strategy.pdf

Given that residential amenity is one of the principal considerations in determining the suitability of land for wind energy development, the extent of land remaining outside the recommended setback is a significant factor supporting the suitability of the Proposed Wind Farm site.

Peat Depth

As part of the design process for the Proposed Project, site investigations were undertaken across the Project Site, to provide detail and clarity on the nature and extent of subsoils and bedrock as a means of characterising the Proposed Project site. This provided information on the most suitable location for turbines and associated infrastructure.

A total of 1,026 no. peat probes have been completed within the Proposed Wind Farm site. The combined peat probe dataset shows that peat depths across the Proposed Wind Farm site range from 0 to >6m with an average peat depth of 1.6m. Approximately 90 percent of peat depth probes recorded peat depths of less than 3.0m. A number of localised readings were recorded where peat depths were greater than 3.5.

Peat depths have been determined to be suitable for development as outlined in **Appendix 8-1** Geotechnical Peat Stability Risk Assessment (PSRA) of the EIAR. As outlined in **Chapter 8** of the EIAR, the findings of the PSRA showed that the Proposed Wind Farm site has an acceptable margin of safety, is suitable for the Proposed Project and is considered to be at low risk of peat failure provided appropriate mitigation measures are implemented.

Suitable Wind Speeds

The Irish Wind Atlas produced by Sustainable Energy Authority of Ireland (SEAI) shows average wind speeds for the country. A suitable wind regime and consistent wind speeds are required for the development of a wind energy project. Wind speeds in the midlands bog groups are between 7 – 8 m/s. While the wind resource of Ireland's midlands is lower than that of coastal and elevated regions, it is still very good in comparison with many parts of Europe. Onsite monitoring of the wind resource, which is ongoing, will further verify that with a sufficient turbine height and blade diameter, the wind resource of the site is commercially viable.

Proximity to the National Grid

The Proposed Grid Connection will facilitate the connection of the Proposed Turbines to the national electricity grid. Underground electrical cables will transmit the power from each wind turbine to the Proposed Onsite Substation. The Proposed Onsite Substation will connect to the Proposed Offsite Substation via 13.1 km of underground 220 kV electrical cabling which will be primarily located in the public road network, with two subsections (0.5 km and 1 km) located in private land. The Proposed Offsite Substation will connect into the national grid via the existing Maynooth-Dunstown 220kV Overhead Line (OHL) in the townland of Killybegs, Co. Kildare, measuring approximately 0.12km in total length (comprising 0.06km of OHL loop-in from the Proposed Offsite Substation to the existing OHL). It is proposed to access the Proposed Onsite Substation via a new site entrance off the R414 (Site Entrance 6L) during the construction and operational phases. The Proposed Offsite Substation and associated OHL cabling infrastructure will be accessed via a proposed new entrance off the L6002 near Prosperous Co. Kildare.

Details regarding potential alternative grid connection options are considered and presented in **Section 3.2.5.4** of **Chapter 3** of the EIAR.

Proximity to Designated Sites

The Proposed Wind Farm is located entirely outside any European or Nationally Designated Site.

The nearest European Site to the Proposed Wind Farm i.e., Special Area of Conservation (SAC) or Special Protection Area (SPA), is The Long Derries, Edenderry SAC (see below). The Ballynafagh Lake SAC is crossed by the Proposed Grid Connection underground electrical cabling route; the entirety of the interaction with the Ballynafagh Lake SAC is within the public road corridor. The Grand Canal proposed Natural Heritage Area (pNHA) is the other nearest Nationally Designated Site. It is located to the north of Ticknevin Bog, approximately 150m from the nearest Proposed Wind Farm infrastructure and more than 730m from the nearest Proposed Turbine, T32. The Proposed Grid Connection underground electrical cabling route crosses the pNHA approximately 0.2km west of Shee Bridge. The Long Derries, Edenderry Special Area of Conservation (SAC), is adjacent the Proposed Wind Farm, in the vicinity of Glashabaun North and Ticknevin Bogs. The nearest Proposed Project infrastructure is located more than 230m from the Long Derries SAC.

The Project Site predominantly comprises former peat extraction lands, including extensive areas of cutover bog and associated secondary habitats. Through the iterative design process, the Proposed Project footprint has been predominantly located within species-poor cutover bog and other modified habitats, while avoiding higher-value and sensitive ecological features where practicable. Potential effects on European and Nationally Designated Sites are assessed in the Appropriate Assessment Screening Report, Natura Impact Statement and **Chapter 6** and **Chapter 7** of the EIAR.

5.2.2 Detailed Constraints and Facilitators Mapping

The design and layout of the proposed wind energy development follows the recommendations and guidelines set out in the WEDG 2006 and the *'Best Practice Guidelines for the Irish Wind Energy Industry'*[5] (Irish Wind Energy Association, 2012).

The WEDG 2006 are currently the subject of a targeted review. The proposed changes to the assessment of impacts associated with onshore wind energy developments are outlined in the document *'Proposed Revisions to Wind Energy Development Guidelines 2006 – Targeted Review'* (2013), the '*Review of the Wind Energy Development Guidelines 2006 – Preferred Draft Approach'* (June 2017), and the Draft WEDG 2019. A consultation process in relation to the Draft WEDG 2019 closed on 19th February 2020. The proposed changes presented in the Draft WEDG 2019 give certain focus on the setback distance from residential properties (four times the proposed maximum tip height), along with shadow flicker and noise requirements relative to sensitive receptors. At time of writing, the Draft WEDG 2019 have not yet been adopted, and the relevant guidelines for the purposes of Section 28 of the Planning Act, remain those issued in 2006.

The constraints mapping process involves the placing of buffers around different types of constraints so as to clearly identify the areas within which no development works will take place. The size of the buffer zone for each constraint has been assigned either using guidance presented in the Draft WEDG 2019 which is more onerous than the buffer zones as detailed in the current WEDG 2006 or based on industry best practice.

Notwithstanding this, however, due to the timelines associated with the planning process for renewable energy projects and the commitment within the Climate Action Plan 2025 to publish revised wind energy development guidelines for onshore wind by Q1 2025 (refer to Section 1.2.2 of Chapter 1 of the EIAR), it is possible that the Draft WEDG 2019 are adopted during the consideration period for the Proposed Project. The relevant guidelines for the purposes of Section 28 of the Act, remain those issued in WEDG 2006.

The constraints map for the site, as shown in **Figure 5-3**, encompasses the following constraints and associated buffers:

[5] https://windenergyireland.com/images/files/9660bdfb5a4f1d276f41ae9ab54e991bb600b7.pdf

- Residential dwellings plus an 880m buffer to the nearest turbine (meeting the proposed requirement for a separation distance of 4 times the proposed tip height from the curtilage of properties in line with the Draft WEDG 2019). To note, for the purposes of identifying the greatest 4 times setback buffer, a tip height of 220m has been utilised (i.e., with 200m tip height turbines located on the 'outer ring' of the Proposed Turbine layout, the closest residential receptor is approx. 4.5 x TH from the nearest Proposed Turbine);
- Minimum Separation Distance of 3 rotor diameters from the built Cushaling Wind Farm in line with the Draft WEDG 2019;
- Two Rotor Diameters from internal BnM ownership boundary in line with the WEDG 2006 (Section 5.13 on Wind Take)
- European (Natura 2000) and Designated sites plus 200m buffer;
- Grand Canal proposed Natural Heritage Area plus 800m buffer;
- Habitats of County Importance (see Chapter 6: Biodiversity);
- Watercourses plus 50m buffer;
- Silt Ponds plus 50m buffer;
- Archaeological Sites or Monuments, plus 'Zone of Notification' as required by the National Monuments Service (ROI).
- Recorded Monuments plus 50m buffer;
- Shanavoola Area plus 20m buffer;
- Article 17 habitat plus 50m buffer;
- Broadleaved Woodland and Fen Habitat plus 50m buffer;
- Japanese Knotweed plus 50m buffer;
- Exclusion of the entire Lullymore Bog due to ecological sensitivities;
- Breeding Curlew habitat plus 800m buffer;
- Lapwing habitat plus 108m buffer;
- Uisce Eireann pipeline (Proposed Water Supply Project for the Eastern and Midlands Region (PL Ref: PA92.323980) plus 50m buffer; and
- Draft WEDG 2019 setback from National and Regional roads and railways of a distance equal to turbine tip height plus 10% (i.e., 242m). To note, for the purposes of identifying the greatest setback buffer from national and regional roads and railway, a tip height of 220m has been utilised;

Facilitators at the Project Site refer to those aspects which build on the existing advantages and include the following:

- Lands are available for development;
- Good wind resource;
- Proximity to existing 220kV transmission lines for grid connection;
- Accessibility of site via Regional, and Local Roads;
- Existing site access points/entrances; and
- Limited extent of constraints.

The inclusion of the constraints on a map of the study area allows for a viable area to be identified. An initial wind farm layout was then developed to take account of all the constraints mentioned above and their associated buffer zones and the separation distances required. Following the mapping of all known constraints, detailed site investigations (4 no. rounds) were carried out.

The ecological assessment of the Project Site encompassed habitat mapping and extensive surveying of birds, bats and other fauna. This assessment, as described in **Chapter 6** and **Chapter 7** of the EIAR on Biodiversity and Ornithology, optimised the decision on the siting of turbines and the carrying out of any development works, such as the construction of roads.

The hydrological and geotechnical investigations at the Project Site examined the proposed locations for turbines, roads and other components of the Proposed Project, such as the Proposed Grid Connection infrastructure. Where specific areas were deemed as being unsuitable for the siting of

turbines or roads, etc., alternative locations were proposed and assessed, taking into account the areas that were already ruled out by constraints.

The flat topography/nature of the terrain on site reflects the low risk of peat failure. A Peat Stability Risk Assessment (**Appendix 8-1** of the EIAR) was undertaken for the Project Site. A Factor of Safety (FoS) of less than 1.0 indicates that a slope is unstable; a FoS of greater than 1.0 indicates a stable slope. An acceptable FoS for slopes is generally taken as a minimum of 1.3. The stability analysis for this project, which analysed the turbine locations, access roads and substation, resulted in FoS above the minimum acceptable value of 1.3 and hence the Project Site has a satisfactory margin of safety. Please see **Appendix 8-1** for further details.

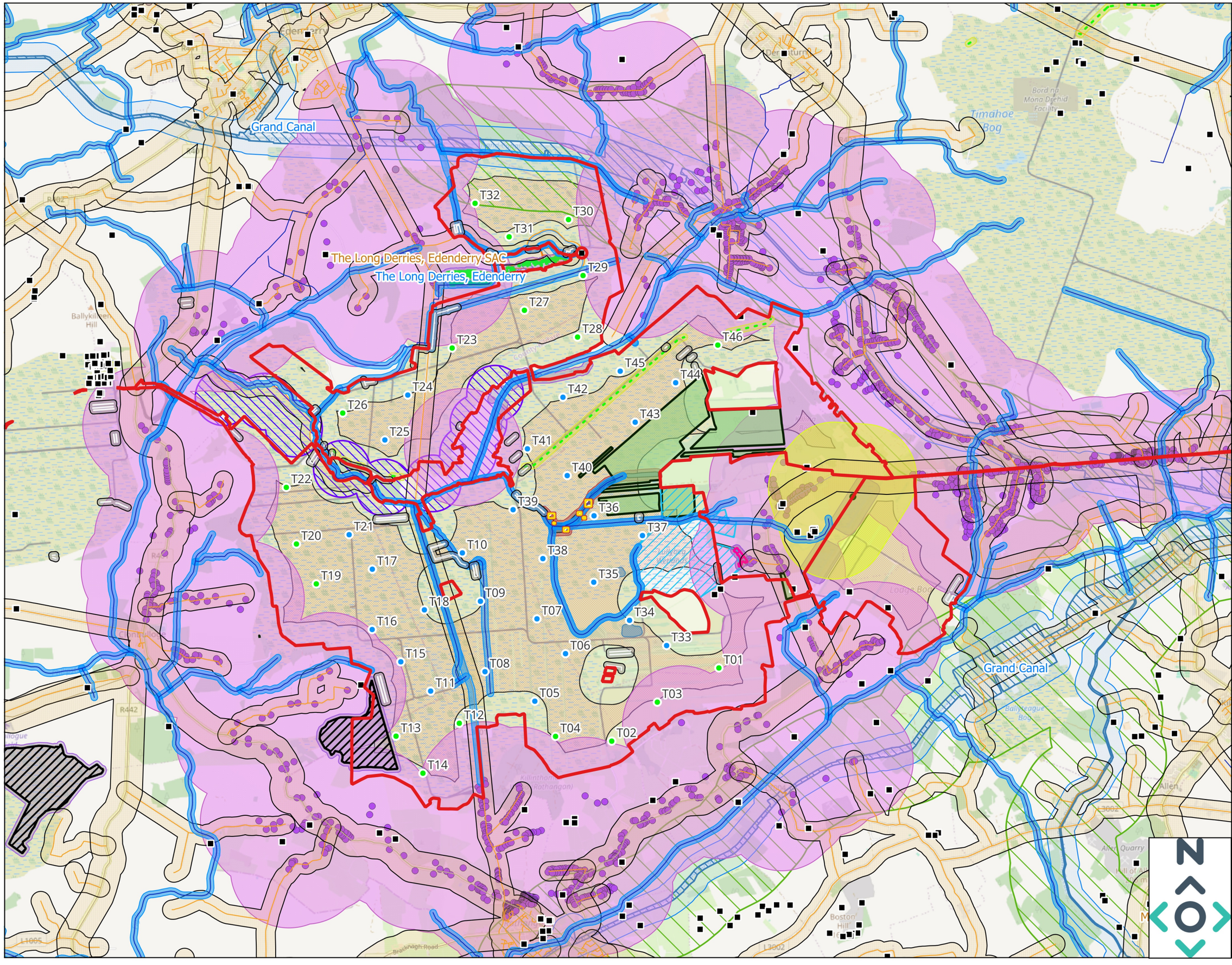
Archaeological investigations, comprising a desktop study and detailed field surveys, identified all recorded National Monuments and Recorded Monuments within the vicinity of, and within, the Project Site. Key constraints and appropriate buffer distances were established to inform the design of the Proposed Project. There is only one instance where Proposed Project infrastructure interacts with a recorded monument, where the proposed new amenity track north-east of T46 crosses the line of Class 1 togher KD012-002001, which extends from higher ground in Ticknevin townland to the north and Derrybrennan townland to the south. This will be subject to archaeological monitoring under licence from the National Monuments Service (NMS). Please see **Chapter 13** and **Chapter 14** of the EIAR for further details.

Through an iterative design process, informed by early-stage impact assessment, landscape modelling, Zone of Theoretical Visibility (ZTV) mapping, and photomontage preparation, the optimum layout for the Proposed Project has been developed with respect to landscape and visual factors. The layout brought forward for assessment minimises the theoretical extent of visibility, while detailed fieldwork and assessment confirm that actual visibility will be less than that predicted by the ZTV mapping. Where visibility does occur, the design accords with best practice guidance and presents a coherent project that integrates sympathetically with the receiving landscape. **Appendix 13-5** and **Chapter 3** of the EIAR provides detail on design evolution and embedded mitigation for LVIA and illustrates in detail how multiple LVIA surveys and assessment work have been undertaken across 2021 to 2026 to progressively inform the turbine layout and embedded landscape and visual mitigation into the Proposed Project.

The turbine layout for the Proposed Project has also been informed by wind data, the results of noise assessments, shadow flicker and the separation distance to be maintained between turbines. Thus, the baseline environmental assessment of the Project Site and Proposed Project design was an iterative process, where findings at each stage of the assessment were used to further refine the design, always with the intention of minimising the potential for environmental impacts.

As the Proposed Wind Farm design was refined, the biodiversity and ornithology mitigation and enhancement measures, detailed in the BMP included as **Appendix 6-5** of the EIAR, for the Proposed Project were also refined through an iterative design process. This process is outlined in **Section 3.2.5.5** of **Chapter 3** of the EIAR.

Please refer to the constraints and facilitators map in **Figure 5-3** below.



Map Legend

- Project Site

Proposed Turbine Locations

- 200m Tip Height
- 220m Tip Height
- 425m (2.5 x RD) Buffer from Built Cushaling Wind Farm

Sensitive Receptors

- Sensitive Receptors
- 880m Sensitive Receptors Buffer

Water

- Watercourses
- 50m Watercourse Buffer
- Silt Ponds
- 50m Silt Pond Buffer

Cultural Heritage

- Recorded Monuments
- Shanavoola Areas
- 20m Shanvoola Area Buffer

Designated Sites

- 800m Grand Canal pNHA Buffer
- SAC
- 200m SAC Buffer
- pNHA
- 200m pNHA Buffer
- NHA
- 200m NHA Buffer

Offaly Article 17 Habitats 2020

- Active Raised Bog 2
- Old Oak Woodlands
- Orchid Rich Calcareous Grassl
- Article 17 Habitat 50m buffer

Ecology

- Broadleaved woodland
- 50m Broadleaved Woodland Buffer
- Coillte Land
- 50m Japanese Knotweed Buffer
- 50m Fen Habitat Buffer
- Lullymore Bog

Birds

- 108m Lapwing Buffer
- Breeding Curlew Habitat
- 800m Breeding Curlew Buffer

Material Assets

- Uisce Eireann Pipeline
- Uisce Eireann Pipeline 50m Buffer
- Roads 242m Buffer
- Two RDs from internal BnM ownership boundary in line with the WEDG 2006 (Section 5.13 on Wind Take)

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Drawing Title

Constraints Map

Project Title	
Ballydermot Wind Farm, Co. Offaly & Co. Kildare	
Drawn By: CJ	Checked By: EC
Project No.: 250708	Drawing No.: Figure 3-1
Scale: 1:50,000	Date: 2026-10-20

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5.2.3 Turbine Layout Design Process

The design of the Proposed Wind Farm has been an informed and collaborative process from the outset, involving the designers, developers, engineers, landowners, environmental, hydrological, geotechnical, archaeological, and traffic specialists.

Throughout the preparation of the EIAR, the layout of the Proposed Wind Farm has been revised and refined to take account of the findings of all site investigations and baseline assessments, which have brought the design from its first initial layout to the Proposed Wind Farm layout. The design process has also taken account of the recommendations and comments of the relevant statutory and non-statutory organisations, the local community and local authorities as detailed in **Chapter 2** of the EIAR, while still seeking to ensure that a viable project can ultimately be constructed and connected to the national grid.

The final design of the Proposed Wind Farm takes account of all identified constraints and the distances that are to be maintained between turbines and the constraints such as houses, roads, etc. The layout is based on the results of all onsite investigations and hinterland surveys that have been carried out during the EIAR process and the EIA scoping process with statutory and non-statutory consultees. As information regarding the Proposed Project was compiled and assessed, the number of turbines and the proposed layout have been revised and amended to take account of the physical constraints of the Project Site and the requirement for buffer zones and other areas which should be avoided. The selection of the number of turbines and layout has also had regard to wind-take and the separation distance to be maintained between turbines, as well as landscape and visual, cultural heritage, noise and shadow flicker elements. The EIAR and Proposed Project design process was an iterative process, where findings at each stage of the assessment were used to further refine the design, always with the intention of minimising the potential for environmental impacts.

The development of the final Proposed Project layout has evolved following feedback from the various studies and assessments carried out as well as ongoing negotiations and discussions with landowners, the local community, and statutory consultees.

There were several reviews of the specific locations of the various turbines during the optimisation of the Proposed Wind Farm layout. The initial constraints study identified a significant viable area within the overall study area of the site. An initial iteration of the Proposed Wind Farm included 59 no. turbines as part of its design. This Iteration No. 1 represents the maximum number of turbines considered for the Project Site within the same study area (please refer to Chapter 3 of the EIAR for further details). The proposed 46 no. turbine final layout has been refined following feedback from the project team, the local community, and the need to ensure sufficient separation distances are maintained for on-site constraints. The Proposed Wind Farm went through 31 separate iterations; within **Chapter 3** an overview of all layout iterations has not been included, but **Plates 3-1** to **3-6** in **Chapter 3** show how the design of the turbine layout evolved during the design process.

Five grid connection options were assessed for the Proposed Project. Following the preliminary wind farm design, the grid infrastructure in and around the site was assessed. A key consideration in determining the grid connection method for a proposed wind energy development is whether the cabling is underground or run as an OHL or a combination thereof. An alternative to the use of both underground cabling and OHL (loop-in cable) would be to construct an approx. 25.3km underground cable connection to the Maynooth Substation, Co. Kildare. While the WEDG 2006 indicate that underground cables are the preferred option for connection of a wind energy development to the national grid, it was determined that due to the proximity of the existing OHL, it was more environmentally prudent to connect the Proposed Wind Farm to the national grid via a combination of OHL and underground cable. The final Proposed Grid Connection has 13.1km of underground electrical cabling and 0.12km of OHL cabling.

An assessment was carried out by the Applicant on the surrounding grid infrastructure and associated possible connection route options for the Proposed Wind Farm. The grid connections that were potentially viable options were assessed, following which 5 no. potential connections for the Proposed Wind Farm to the national grid were identified. The potential connection methods were assessed by AECOM, and the options were ranked based on economic, technical, and environmental considerations.

The assessment concluded that the approximately 13.1 km underground connection to an offsite substation with an OHL connection into the existing Maynooth-Dunstown 220kV OHL was the best option from an economic, technical, and environmental perspective.

Further details of the design process and a selection of design iterations can be found in **Chapter 3**, **Section 3.2.5.4** of the EIAR.

6. LEGISLATIVE CONTEXT

6.1 Planning and Development Act 2000 (as amended)

Strategic Development Infrastructure

This planning application for the Proposed Project is being made pursuant to Section 37E of the Planning Act. Section 37E provides the statutory framework for the assessment of applications for strategic infrastructure development (SID) which, by reason of their nature and scale, are of strategic economic or social importance to the State or the region concerned. Threshold for SID infrastructure is established in the 7th Schedule of the Planning Act. The relevant threshold established in the 7th Schedule for the Proposed Project provided below:

"An installation for the harnessing of wind power for energy production (a wind farm) with more than 25 turbines or having a total power output greater than 50MW".

Along with meeting the threshold established in the 7th Schedule, one or more of the following criteria, set out under Section 37A(2) of the Planning Act, must be satisfied.

i. *be of strategic economic or social importance to the State or the region in which it would be situate,*
ii. *contribute substantially to the fulfilment of any of the objectives of the National Planning Framework or of any regional spatial and economic strategy, or*
iii. *have a significant effect on the area of more than one planning authority,*

The Proposed Project exceeds the 7th Schedule threshold and meets the criteria set out under Section 37A(2) of the Planning Act.

In accordance with Section 37B of the Planning Act, the Applicant engaged in pre-application consultations with ACP in order to determine whether the Proposed Project constituted a SID project. Following consideration of the submissions made and the nature, scale and characteristics of the Proposed Project, the Commission formed the opinion, under Section 37A(2)(a) and (b), that the Proposed Project does fall within the definition of strategic infrastructure development within the meaning of the Planning Act. The Commission served notice of their opinion under Section 37B(4)(a) on 12th October 2026.

Accordingly, pursuant to Section 37E(1) of the Planning Act, the application for permission for the Proposed Project is being made directly to the Commission.

RED III

On 6th August 2025, the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. No. 274 of 2025) were 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 (ss.34E, 37JB, 295B): 52 weeks for new wind farms, 30 weeks for repowering projects, and one to two years for IROPI 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.

Appendix 1 of the Cover Letter included with this application includes a table demonstrating compliance with the 'Schedule of information to inform the completeness check' as appended by the Commission to the SID determination. An additional 'Note' column has been added to provide additional context to ACP. It is the Applicant's view that the planning application satisfies the completeness check.

Requirement for EIAR

The EIA Directive 2011/92/EU, as amended (the 'EIA Directive'), has been incorporated into Irish law primarily through the Planning Act and the Planning and Development Regulations 2001, as amended ('the Regulations').

Part 2 of Schedule 5 of the Regulations identifies classes and scales of development that require Environmental Impact Assessment (EIA). The relevant class of development in this case relates to "*installations for the harnessing of wind power for energy production (wind farms) with more than 5 turbines or having a total output greater than 5 megawatts*", as per Item 3(i) of the Schedule. The Proposed Project exceeds 5 Megawatts in scale and proposes more than 5 turbines and therefore is subject to EIA. As such, the application for the Proposed Project is accompanied by an EIAR.

Requirement for AA/NIS

Article 6(3) of the Habitats Directive sets out the requirement for an Appropriate Assessment (AA) of any plan or project that is not directly related to the management of a protected site but is likely to have a significant effect on it. This assessment evaluates the potential implications for the site in light of its conservation objectives. Competent authorities are mandated to grant development consent only if it is ascertained that a proposed project will not adversely affect the integrity of the site concerned or if it will, if there are imperative reasons of overriding public interest why it should proceed, and the relevant criteria is met.

Under Section 177U of the Planning Act, the legal requirements pertaining to AA set out in Part XAB of the Planning Act, apply to this application for development permission under Section 37E. This application for development permission is therefore accompanied by an AA Screening Report and an NIS.

6.2 Planning and Development Act 2024 (as amended)

The Planning and Development Act 2024 ('the Planning Act 2024') was signed into law by the President on the 17th of October 2024, after passing in both Houses of the Oireachtas. At the time of lodgement of this planning application, the consenting provisions of the Planning Act remain in place until such time as 'Block C' of the Planning Act 2024 is commenced by Ministerial Orders.

Should the consenting provisions of the Planning Act 2024 commence while this application is being decided, it is noted that, upon repeal of the Planning Act, a grant of permission under Section 37G will be deemed to be a permission granted under Section 123 of the Planning Act 2024.

6.3 Climate and Renewable Energy Legislation

6.3.1 European Legislation

The Renewable Energy Directive (RED) is the EU's legal framework for the development of renewable energy across all sectors of the EU economy, supporting clean energy cooperation across EU countries.

Since its adoption in 2009, the RED has evolved through three major iterations-RED I (2009), RED II (2018), and RED III (2023)-each raising ambition to support decarbonisation and energy security.

Under RED I, Member States were legally required to meet a 20% share of renewables in final energy consumption by 2020. RED II increased this target to 32% by 2030. Most recently, RED III, which entered into force in November 2023, raised the target further to 42.5% by 2030, with an indicative ambition of 45%, in line with the REPowerEU Plan.

In order to ensure that the RED III target of 42.5% is achieved, EU Member States must notify their climate and energy objectives, targets, policies, and measures to the European Commission and were established under Regulation (EU) 2018/1999 of the European Parliament and of the Council on the Governance of the Energy Union and Climate Action ('the Governance Regulation')[6]. The Department of the Environment, Climate and Communications (DECC) submitted an updated National Energy and Climate Plan (NECP) 2021-2030 to the European Commission in July 2024. The updated NECP committed to achieving a 43% share of renewable energy in total energy consumption by 2030. In the trajectories set out in the updated NECP, it states that Ireland's proposed trajectory will not be in line with the desired trajectory set out in the Governance Regulation.

Given that, of 27 EU member states, Ireland had one of the lowest proportions of renewable energy at 16% in 2024[7], the implementation of RED III represents both a legal obligation and an opportunity to remove procedural bottlenecks that hinder critical infrastructure, such as the Proposed Project.

6.3.2 National Legislation

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

The Climate Action and Low Carbon Development Act 2015 (as amended) ('the Climate Act') establishes a legislative imperative to reduce Ireland's carbon emissions. 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 also 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 two five-year carbon budgets proposed by the Climate Change Advisory Council should equate to a total reduction of 51% over the period to 2030, relative to a baseline of 2018;
- The role of the Climate Change Advisory Council 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.

[6] *Regulation (EU) 2018/1999 of the European Parliament and of the Council on the Governance of the Energy Union and Climate Action, available at:* https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32018R1999
[7] https://ec.europa.eu/eurostat/statistics-explained/index.php?title=File:Renewable_energy_2024_infographic.jpg

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,
a) the most recent approved national long term climate action strategy,
b) the most recent approved national adaptation framework and approved sectoral adaptation plans,
c) the furtherance of the national climate objective, and
d) 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.

7. PLANNING POLICY CONTEXT

The following section provides a summary of the planning, renewable energy and climate policy context relevant to the Proposed Project. A more detailed and comprehensive breakdown of planning policy at all levels is set out in **Chapter 2** of the EIAR.

It is clear from the policies outlined below that the Proposed Project is strongly supported in principle by policy at all levels. The following section contains a synopsis of the current policies in place and their relevance to the Proposed Project.

The Proposed Project sits within a policy framework characterised by several recent crises, which have significantly influenced policy changes in recent years. These crises have heightened the imperative for Ireland to transition towards a renewable energy-focused electricity grid and have emphasised the necessity for diversifying its energy sources.

7.1 International, National and Regional Policy

7.1.1 International Policy

Paris Agreement

On an international level, Ireland is a signatory of the Paris Agreement, a global initiative adopted in 2015 that aims to address climate change by limiting global warming to well below 2 degrees Celsius above pre-industrial levels, with efforts to limit the increase to 1.5 degrees Celsius. Under the Paris Agreement, countries submit Nationally Determined Contributions (NDCs), outlining their individual climate action plans and commitments. Ireland's contribution comes under the European Union's (EU) NDCs targets and is based on the European Union's 2030 emissions reductions targets.

European Green Deal

On a European level, 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. 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 existing target, upwards from 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.

The EU Fit for 55

The EU Fit for 55 package was published in late 2021 with the aim of reducing EU emissions by at least 55% by 2030 compared to 1990 levels and making the EU carbon-neutral by 2050. This EU package is a set of proposals to revise all existing EU acts on climate and energy and increase the EU target for renewables in the overall energy mix from 32% in 2030 to 40%.

Renewable Energy Directive & REPowerEU

In November 2023, a revision of the Renewable Energy Directive[8] (RED III), came into force. RED III 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. This increase comes following the Russian invasion of Ukraine and the publication of REPowerEU plan in May 2022. REPowerEU aims to make Europe independent from Russian fossil fuels including oil and gas by rapidly transitioning to renewable energy. The plan aims to accelerate the scale up of renewables by speeding up the permitting process and placing renewable energy developments in the category of overriding public interest. As discussed above in
Section 6.1 above, some of the provisions of RED III were introduced into Irish legislation in August 2025.

AccelerateEU - Affordable and Secure Energy through Accelerated Action

In response to the latest global fuel crisis due to the escalation of the conflict in the Middle East, the EU published a communication calling for an acceleration to homegrown clean energy and electrification. It states that the capacity of renewable electricity in the EU per year should increase to 100 GW per year. In order to achieve this, the communication highlights the need to deliver renewable energy projects at pace by streamlining national permitting process in line with the requirements of EU legislation, such as RED III.

EU Nature Restoration Law (Regulation (EU) 2024/1991)

The EU Nature Restoration Law (Regulation (EU) 2024/1991), amending Regulation (EU) 2022/869, was published in the Official Journal of the European Union on 29 July 2024 and entered into force on 18 August 2024. The Regulation establishes legally binding targets to restore degraded ecosystems, enhance biodiversity and strengthen resilience to climate change. It aims to ensure that restoration measures cover at least 20% of the EU's land areas and 20% of its sea areas by 2030, with all ecosystems in need of restoration addressed by 2050.

Regulation (EU) 2024/1991 includes specific restoration obligations for terrestrial, freshwater, marine, agricultural, forest and urban ecosystems, including the restoration of habitats and species, peatlands and pollinator populations. Member States are required to prepare National Restoration Plans outlining measures to achieve these targets. The Regulation also recognises the importance of renewable energy development, with Article 6 establishing a presumption of overriding public interest for renewable energy projects, including associated grid infrastructure, for the purposes of specified restoration-related derogations.

7.1.2 National Policy

Climate Action Plan 2025

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

[8] *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)*

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 (at least 5 GW by 2030), and solar energy (up to 5 GW by 2025; 8 GW by 2030).

National Development Plan 2021 – 2030

The National Development Plan 2021 – 2030 (NDP) sets out the major public investment projects identified by 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 subject development, climate change. It is stated that the NDP will be the *'largest and greenest ever delivered in Ireland'*, and in this regard, the NDP highlights that extensive consultation was undertaken to ensure that the plan adequately supports the implementation of climate action measures.

One of the NDP's strategic climate priorities in 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 an ambitious and an explicit driver for the deployment of new renewable generators such as the Proposed Wind Farm. The focus of investment in renewable energy infrastructure is to contribute to a long-term, sustainable and competitive energy future for Ireland.

The National Development Plan Review 2025 (NDP Review) sets out a comprehensive capital investment framework for the period 2026-2035, totalling €275.4 billion. Within this framework wind energy is recognised as a key enabler of the State's legally binding commitment to reduce greenhouse gas emissions by 51% by 2030, including a 75% reduction in emissions from the electricity sector. To support the expansion of renewable electricity generation, the Government has allocated €3.5 billion in equity funding to ESB Networks and EirGrid to enhance grid transmission and distribution infrastructure, which will directly facilitate increased integration of wind energy developments such as the Proposed Project.

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. **National Strategic Outcome 8** to Transition to a Carbon Neutral and Climate Resilient Society remains unchanged.

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.** This target is the largest of all 3 regions (Northern and Western: 1,389 MW, Southern: 978 MW).

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 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 Midlands region is set to deliver a significant amount of onshore wind energy in the coming years.

The Revised NPF has identified the post-industrial peatlands of the Eastern and Midland region as potentially suitable locations for some of this onshore wind energy, 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*'.

For the Eastern and Midland Region in particular, the Framework 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 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. Regarding 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.

National Energy Security Framework

The National Energy Security Framework (NESF), adopted in 2022, implements many of the aims and objectives of REPowerEU on a national level, reinforcing the State's requirement to urgently diversify away from imported fossil fuels and accelerate the roll out of renewables. The NESF is supported by the recently published Energy Security Package 'Energy Security in Ireland to 2030'. The Energy Security Package provides further long-term energy security measures which include the prioritisation of achieving a renewables-led energy system.

Programme for Government – Securing 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 is committed to reducing Greenhouse Gas emissions by an average 7% per annum over the next decade in a push to achieve net-zero emissions by the year 2050.

Regarding renewable energy generation, the Programme notes that the Government is committed to the rapid decarbonisation of the energy sector. The Programme states the Government's ongoing support and commitment to take "*the necessary action to deliver at least 70% renewable electricity by 2030"*. This target has been updated by subsequent Climate Action Plans.

Wind Energy Development Guidelines 2006

In June 2006, the then Department of Environment, Heritage and Local Government (DoEHLG) published the 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.

Draft Wind Energy Development Guidelines 2019

In December 2019, the Draft WEDG 2019 were published. A further review of the Draft WEDG 2019 is currently underway by the Department of Housing, Local Government and Heritage (DHLGH) and the Department of Climate, Energy and the Environment, 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 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 has to play in tackling climate change.

While the WEDG 2006 remain the relevant statutory guidance, 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 requirements therein. While the final guidelines have not yet been published, it should be noted that shadow flicker and noise are entirely controllable and will be capable of adhering to the relevant standards. Further discussion is provided in **Chapter 5**: Population and Human Health and **Chapter 12**: Noise and Vibration respectively. In addition, the Proposed Project maintains a setback of four times the turbine tip height between turbines and third-party sensitive receptors which is currently the recognised standard for visual amenity purposes, as outlined in the Draft WEDG 2019.

National Peatlands Strategy

The National Peatlands Strategy was published in 2015, establishing a national framework for the sustainable management, conservation and restoration of Ireland's peatlands. The Strategy recognises the importance of peatlands for biodiversity, carbon storage, climate change mitigation, water quality and flood regulation, while supporting appropriate land uses, including renewable energy development on cutaway bogs. The National Peatlands Strategy Mid-Term Review took place in June 2021. The Implementation Plan, that was subsequently published in March 2023, updates the Strategy's priorities for 2022–2025, focusing on peatland restoration, biodiversity enhancement, climate action and measurable actions to support the sustainable management of Ireland's peatlands.

7.1.3 Regional Policy Context

Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031

The RSES for the Eastern and Midlands Region recognises that climate change is impacting and will continue to impact many of the policies and objectives contained in the RSES, and as such, informs policies including those in relation to flood risk management and surface water drainage, settlement strategy, transport, waste management, water services, energy, natural heritage, and green and blue infrastructure.

With regards to the current situation, the RSES notes an overall increase in greenhouse gas emissions from most sectors. The main emissions sources which are relevant to the Region include electricity, built environment, the transport sector and agriculture. To support transition to a low carbon, circular & climate resilient region, the Eastern and Midland Regional Assembly is committed to the Region becoming a low-carbon and circular region. This will require reduction of all greenhouse gases, of which carbon dioxide is the most prominent.

The priority is to minimise energy demand and waste and then address how energy will be supplied and renewable technologies incorporated. In order to address this, it is necessary to reduce the effects of climate change through settlement and travel patterns, energy use, waste and protection of green infrastructure.

A review of the RSES is being carried out by the EMRA in accordance with Section 31(1) of the New Planning Act and the European Union (Land Use Planning – Strategic Environmental Assessment) Regulations 2025. In March 2026, EMRA published a Pre-Draft Issues Paper as part of the initial consultation stage. Consultation for the same took place from 26th March 2026 to 22nd May 2026, and a Director's Report summarising the submissions received was presented to the Regional Assembly on 10th July 2026. The paper identifies energy as being a core part of the region's low carbon future and supports the move to a greater share of renewable energy. A key function of the RSES will be to prepare a Regional Renewable Energy Strategy (RRES) to identify local authority allocations for onshore wind and solar capacity based on the NPF.

Table 7-1 below sets out the compliance of the Proposed Project against relevant policy at international, national and regional levels.

Table 7-1 International, National & Regional Policy Objective and Compliance Summary Table

Policy Document	Targets / Objectives	Compliance
Paris Agreement	Limit global warming to well below 2 degrees Celsius above pre-industrial levels, with efforts to limit the increase to 1.5 degrees Celsius.	The Proposed Project will generate clean, renewable and sustainable wind energy which will reduce reliance on greenhouse gas emitting fossil fuels for energy generation. This will contribute to limiting global warming.
Renewable Energy Directive	42.5% renewable energy by 2030, aiming for 45%.	The Proposed Project will increase Ireland's renewable energy share, contributing towards Ireland's climate and energy obligations under EU law.
REPowerEU	› Accelerate the roll-out of renewables. › Increase the 2030 target for renewables from 40%-45%. › Tackle slow and complex permitting for major renewable projects	Considering the urgency required under the REPowerEU, it is imperative that all suitable sites, such as the site of the Proposed Project, are developed as soon as possible, in accordance with proper planning and sustainable development.
European Green Deal	› Increase renewable energy share › Reduce greenhouse gas emissions › Clean energy transition	The Proposed Project will generate and provide clean renewable onshore wind energy which will increase Ireland's renewable energy share, reduce reliance on greenhouse gas emitting fossil fuels for energy generation and will support the transition to a clean, renewables led energy system.
EU Nature Restoration Law (Regulation (EU) 2024/1991)	› Implement restoration measures covering at least 20% of EU land areas and 20% of EU sea areas by 2030, including at least 30% of degraded terrestrial, coastal and freshwater habitat areas by 2030, increasing to 60% by 2040 and 90% by 2050 of each relevant habitat group, subject to specified derogations, with restoration measures in place for all ecosystems in need of restoration by 2050. › Restore at least 25,000 km of rivers to free-flowing condition by 2030.	The Proposed Project will not preclude the restoration of the wider cutaway bog. The BMP (**Appendix 6-5**) also provides for peatland enhancement and native woodland planting. Please refer to **Chapter 6** of the EIAR for further details. No infilling or realignment of natural watercourses is proposed. The routes of natural watercourses will not be altered as part of the Proposed Project. Please refer to Chapter 9 of the EIAR for further details.

	› Reverse the decline of pollinator populations by 2030. › Restore at least 30% of drained peatlands under agricultural use by 2030, with at least one-quarter of that area rewetted.	The Proposed Project includes biodiversity enhancement and offset measures comprising peatland enhancement, native woodland planting, marsh fritillary habitat management, scrub mosaic habitat creation, pollinator-friendly corridors, and habitat creation for key ornithological species. These measures support green infrastructure, ecological connectivity, peatland rehabilitation and public access. Please refer to **Appendix 6-5** and **Chapter 6** of the EIAR for further details. The Proposed Wind Farm site comprises former industrial cutaway peatland. The measures outlined in the Draft Rehabilitation Plan (**Appendix 2-4** of the EIAR) will be implemented by BnM in agreement with the EPA, per the BnM's IPC Licence Obligations (P0503-01). This requirement applies independently of the Proposed Project's planning status. Please refer to **Chapter 4** of the EIAR for further details.
Climate Action Plan 2025	9GW of onshore wind by 2030, 6GW by 2025.	The Proposed Project will contribute directly towards the CAP25 goals of 9GW of wind energy by 2030. Onshore wind is identified as being critical in the decarbonisation of the electricity sector and as such the Proposed Wind Farm should be considered in that regard.
The National Planning Framework First Revision	National Strategic Outcome 8: Transition to a low carbon and climate resilient economy.	The Proposed Project is in line with the National Strategic Outcome 8 of the Revised NPF which seeks to transition to a low carbon and climate resilient economy. If permitted, the Proposed Project will contribute to the achievement of National Policy Objectives 70, 71, 73, 74 and 75.
National Development Plan 2021 - 2030	National Strategic Outcomes 8: Transition to a Climate-Neutral and Climate Resilient Society	The NDP is clear in its priority to reach a low-carbon, climate resilient society over the lifetime of the plan. The Proposed Project, if

		permitted, will provide clean, renewable electricity to the national grid, furthering development objectives of the NDP.
The National Energy & Climate Plan 2021 – 2030	› Decarbonisation - Renewable energy › Energy security	The Proposed Project will contribute to achieving key decarbonisation and energy security objectives by adding a new renewable electricity generator to the national grid.
National Energy Security Framework	› Ensuring security of energy supply in the near-term; › Reducing our dependency on imported fossil fuels in the context of the phasing out of Russian energy imports across the EU.	The Proposed Project will reduce the need for imported fossil fuels for electricity, improving national energy security.
Energy Security in Ireland to 2030 – Energy Security Package	› Reduced and Responsive Demand. › Renewables-Led System. › More Resilient Systems. › Robust Risk Governance.	The Proposed Project supports the objectives to ensure 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.
Wind Energy Guidelines	› Acceptable noise thresholds and monitoring frameworks › Visual amenity setback and spacing › Control of shadow flicker › Compliance with Community consultation and dividend requirements › Consideration of the siting, route and design of the proposed grid connection as part of the whole project.	The Proposed Project complies with the requirements set out by the WEDG 2006 including noise, set back, shadow flicker, and community consultation guidelines. The Proposed Project has been designed in compliance with the WEDG 2006 and the setback requirements of the Draft WEDG 2019 are achieved, and noise and shadow flicker can be controlled to meet revised standards should the Draft WEDG 2019 be adopted.
National Peatlands Strategy	› Protect, conserve and sustainably manage Ireland's peatlands to support biodiversity, carbon storage, water quality and climate change mitigation by 2025. › Publish revised Wind Energy Development Guidelines incorporating peatland guidance and identify additional peatlands for enhanced rehabilitation by 2023.	The Proposed Wind Farm site comprises former industrial cutaway peatland. The measures outlined in the Draft Rehabilitation Plan (**Appendix 2-4** of the EIAR) will be implemented by BnM in agreement with the EPA, per the BnM's IPC Licence Obligations (P0503-01). This requirement applies independently of the Proposed Project's planning status. Please refer to **Chapter 4** of the EIAR for further details.

	› Improve peatland mapping and greenhouse gas emissions inventories by 2025. › Deliver Bord na Móna's Enhanced Decommissioning, Rehabilitation and Restoration Scheme by 2026.	The Proposed Project has been designed in compliance with the WEDG 2006 and the setback requirements of the Draft WEDG 2019 are achieved, and noise and shadow flicker can be controlled to meet revised standards should the Draft WEDG 2019 be adopted.
Eastern and Midland Region – Regional Economic & Spatial Strategy	› **RPO 7.31:** Within 1 year of carrying out a regional emissions assessment, EMRA shall compile and publish an emissions inventory and, in collaboration with the relevant departments and agencies, agree emissions reductions targets in accordance with agreed national sectoral plans and to support an aggregate 40% reduction in greenhouse gas emissions by 2030 in line with the EU 2030 Framework. › **RPO 7.32:** With the assistance and support of the Climate Action Regional Offices, local authorities shall develop, adopt and implement local climate adaptation and mitigation strategies which shall address issues including local vulnerability to climate risks and identify and prioritise actions, in accordance with the Guiding Principles of the National Adaptation Framework, National Mitigation Plan.	The Proposed Project will generate clean and renewable wind energy, reducing reliance on greenhouse gas emitting fossil fuels for energy generation and supporting the region's transition to a low-carbon, climate resilient and sustainable economy and society. The Proposed Project which is a renewable energy development will align with national climate and renewable energy policy and targets as set out in the RSES.

Table 7-2 Eastern and Midland Regional Assembly - Regional Economic & Spatial Strategy, Guiding Principles for Development on Peatland Areas

Policy / Legislative Document	Targets / Objectives	Compliance
Eastern and Midland Regional Assembly - Regional Economic & Spatial Strategy Guiding Principles for Development on Peatland Areas	In the consideration of development on peatland areas, the following Guiding Principles should apply:	
	› Consideration of the potential contribution of peatlands to climate change mitigation and adaptation including renewable energy production.	The Proposed Project, which includes the Proposed Wind Farm and the Proposed Grid Connection, is primarily located within a peatland setting and aligns with this guiding principle as it will provide a renewable energy development that will generate and supply renewable wind energy to the national electricity grid.

	› Consideration of habitats and species of environmental significance.	Habitats and species of environmental significance are considered in the **NIS**, and **Chapter 6** and **Chapter 7** of the EIAR. Please refer to **Table 7-3** and **Table 7-6** of the Planning Report, along with the **NIS,** and **Chapter 6** and **Chapter 7** of the EIAR for further details.
	› Consideration of the potential contribution of peatlands to an existing or proposed greenway/blueway/peatway network.	The Proposed Project will upgrade approximately 2.8km of existing track within the Proposed Wind Farm site and provide approximately 60km of new internal site access roads, passing bays and a layby area. An additional 13.4km of a new dedicated internal amenity access track, 1km of dedicated equestrian track, and 0.84km (844m) of amenity boardwalk is proposed as part of the Proposed Project to link into the 40km of proposed internal access road that will be available as amenity access tracks and to provide a greater variety of walking loops and connectivity to local roads, offsite existing amenities and allow local access to the Proposed Wind Farm. Please refer to **Chapter 4** of the EIAR for further details.
	› Consideration of the ecosystem services and tourism potential provided by peatlands.	
	› Development of peatlands shall ensure that there are no negative impacts on water quality.	Potential impacts on water quality are considered in **Chapter 9** of the EIAR. Please refer to **Table 7-3** and **Table 7-6** of this Planning Report, along with the **Chapter 9** of the EIAR for further details.

7.2 Local Policy Context

7.2.1 Offaly County Development Plan 2021-2027

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

The OCDP sets out the strategic vision for Co. Offaly and is as follows:

> *To create a sustainable and competitive county that supports the health and wellbeing of our people and places, from urban to rural, with access to employment opportunities supported by high quality housing and physical, social and community infrastructure for all, in a climate resilient manner and with respect for our biodiversity.*

The strategic objective of the OCDP relevant to the Proposed Project is as follows:

- Achieve transition to a competitive, low carbon, climate resilient and environmentally sustainable economy. This should be facilitated through reducing the need to travel, by integrating land use and sustainable modes of transport, and by reducing the use of non-renewable resources. In line with this, promote active and healthy lifestyles through increased opportunities for walking, cycling and active sport recreation.

The Proposed Project as a renewable energy development will support Co. Offaly in realising and achieving its strategic vision and objectives to create a sustainable, low-carbon, climate-resilient and environmentally sustainable economy and society by generating and providing c. 322MW of renewable wind energy. The Proposed Project will reduce the county's reliance on non-renewable resources for energy generation such as fossil fuels by providing a renewable wind energy generator, subsequently reducing greenhouse gas emissions.

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".*

The OCDP includes policies in relation to climate action and reducing greenhouse gas emissions which aligns the County with wider European, national and regional objectives. The OCDP also includes policies regarding renewable energy and electricity grid infrastructure.

Table 7-3 below sets out the policies and objectives within the OCDP relevant to the Proposed Project. A statement of compliance is included with regard to each relevant policy outlined. It is demonstrated through

Table 7-3 that the Proposed Project is in compliance with the relevant policies and objectives of the OCDP.

Table 7-3 Co. Offaly Local Policy Objective and Compliance Summary Table

Policy Theme	Policy/ Objective	Compliance
Climate Action	**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.	The Proposed Project is in compliance with **CAEP-07**, **CAEP-10** and **CAEP-11**, as it directly contributes to the 9 GW onshore wind energy target set out in CAP25. The Proposed Project will generate c. 322 MW of clean, renewable electricity, which will be integrated into the grid, reducing the reliance on imported fossil fuels and as such reducing emissions of greenhouse gases. This will also aid in achieving the climate change and renewable energy objectives to reach national targets and transition to a low-carbon economy.
	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.	

Policy Theme	Policy/ Objective	Compliance
Renewable Energy	**CAEP-25** It is Council policy to encourage and facilitate the production of energy from renewable sources, such as from bioenergy, waste material, solar, hydro, geothermal and wind energy, subject to proper planning and environmental considerations.	The Proposed Project aligns with **CAEP-25** and **CAEP-37** by supporting the generation of clean, renewable energy which will be integrated into the national grid, helping to electrify and decarbonise other sectors, therefore, reducing the reliance on imported fossil fuels and improving the sustainability and security of Ireland's national and regional energy system. The Proposed Project will support the achievement of national targets in relation to reductions in fossil fuel dependency and greenhouse gas emissions.
	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; › have regard to Development Management Standard 109 on wind farms contained in Chapter 13 of the Plan; and › have regard to existing and future international, European, national and regional policy, directives and legislation.	**Table 7-5** of this Report provides a compliance statement against the OCDP Wind Energy Development Management Standards (Development Management Standard 109), which include; the WEDG 2006 and Draft WEDG 2019; the OCDP Wind Energy Strategy Designation Areas and all other development management standards in relation to wind energy as set out in Chapter 13 of the OCDP. Please refer to **Table 7-5** of this Planning Report for further details. The EIAR, NIS and this Planning Report demonstrate that the Proposed Project is supported by existing international, European, national, regional and local policy and objectives.
	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 Proposed Project will support the national policies in relation to climate action and renewable energy by generating sustainable renewable energy. The Proposed Project will also contribute to the

Policy Theme	Policy/ Objective	Compliance
	the wind energy resources of the county to be harnessed in an environmentally sustainable manner.	achievement of 9GW onshore wind energy and 80% renewable energy by 2030 as set out in CAP25. It should also be noted that the layout of the Proposed Project has been designed to minimise the potential environmental effects, while at the same time maximising the energy yield from the wind resource at the Project Site. Constraint studies, as described in **Chapter 3** of the EIAR, have been carried out to ensure that turbines and all ancillary infrastructure are located in the most appropriate areas of the site.
	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.	The Proposed Project aligns with **CAEO-04** as it will generate clean, renewable electricity, which will be integrated into the grid, helping to electrify and decarbonise other sectors, therefore, reducing the reliance on imported fossil fuels and improving the sustainability and security of the national, regional and County energy system. The EIAR, NIS and this Planning Report demonstrate that the Proposed Project is in line with the proper planning and sustainable development of the area in which the Project Site is located.
	CAEO-05 It is an objective of the Council to implement the Council's Wind Energy Strategy as follows: 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; 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	The entirety of the Proposed Project is located in an area 'Open to Consideration' for wind energy development. **Table 7-5** of this Report provides a compliance statement against the OCDP Wind Energy Development Management Standards, which include; the WEDG 2006 and Draft WEDG 2019; the OCDP Wind Energy Strategy Designation Areas and all other development management standards in relation to wind energy as set out in Chapter 13 of the OCDP.

Policy Theme	Policy/ Objective	Compliance
	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.	Please refer to **Table 7-5** of this Report for further details.
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.	The Proposed Project comprises a renewable energy development which will generate and supply c. 322 MW of wind energy to the national grid, making use of the County's wind resources in a former industrial peatland setting. The Proposed Project will support the transition of County Offaly's long history of power generation towards a low-carbon, climate-resilient, renewable and sustainable energy system.
	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.	The Proposed Project will upgrade approximately 2.8km of existing track within the site and provide approximately 60km of new internal site access roads, passing bays and a layby area. An additional 13.4km of a new dedicated internal amenity access track, 1km of dedicated equestrian track, and 0.84km (844m) of amenity boardwalk is proposed as part of the Proposed Project to link into the 40km of proposed internal access road that will be available as amenity access tracks and to provide a greater variety of

Policy Theme	Policy/ Objective	Compliance
		walking loops and connectivity to local roads, offsite existing amenities and allow local access to the Proposed Wind Farm. Please refer to **Chapter 4** of the EIAR for further details.
	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.	Please refer to the EIAR and NIS submitted with the planning application for further details on assessments carried out in relation to the Proposed Project.
	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).	The measures outlined in the Draft Rehabilitation Plan (**Appendix 2-4** of the EIAR) will be implemented by BnM in agreement with the EPA, per the BnM's IPC Licence Obligations (P0503-01). This requirement applies independently of the Proposed Project's planning status. The proposed biodiversity enhancement and mitigation measures have been designed with due regard for ongoing and future rehabilitation activities on the site.
	BLP-18 It is Council policy to support collaboration between Offaly County Council, Regional Transition Team and relevant stakeholders of a partnership approach to integrated peatland management for a just transition that incorporates the management, rehabilitation and restoration / re-wetting of significant tracts of peatlands in conjunction with appropriate developed after uses.	The Proposed Project represents an appropriate after-use of lands historically used for peat extraction, supporting their transition to renewable energy use and is therefore consistent with **BLP-18** and the Council's support for the integrated management of peatlands as part of a just transition.
	BLO-28 It is an objective of the Council to protect the County's 'Peatland and Nature Corridors' as shown in Figure 4.9(b) in such a manner that any future development therein is of an appropriate scale and design that does not give rise to significant adverse impacts on the environment, biodiversity & habitats,	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 Offaly County Development Plan.

Policy Theme	Policy/ Objective	Compliance
	landscape character, or visual amenity and can integrate effectively into its surroundings; to strictly direct large scale energy production projects, most particularly wind farms, onto areas that are located outside of the 'Peatland and Nature Corridors', and to integrate routes identified in the Midlands Cycling Destination - Offaly Network Map and the National Cycle Network within the corridors.	
Green Infrastructure	**BLP-28** It is Council policy to protect existing green infrastructure within the county, to provide additional green infrastructure where possible and to encourage green infrastructure to be spatially connected to facilitate the extension or establishment of ecological corridors.	The Proposed Project will upgrade approximately 2.8km of existing track within the site and provide approximately 60km of new internal site access roads, passing bays and a layby area. An additional 13.4km of a new dedicated internal amenity access track, 1km of dedicated equestrian track, and 0.84km (844m) of amenity boardwalk is proposed as part of the Proposed Project to link into the 40km of proposed internal access road that will be available as amenity access tracks and to provide a greater variety of walking loops and connectivity to local roads, offsite existing amenities and allow local access to the Proposed Wind Farm. This will facilitate public access to and appreciation of the peatland landscape and its natural and cultural heritage. The Proposed Project provides an internal amenity access network and includes biodiversity enhancement and offset measures comprising peatland enhancement, native woodland planting, marsh fritillary habitat management, scrub mosaic habitat creation, pollinator-friendly corridors, and habitat creation for key ornithological species. These measures support green infrastructure, ecological connectivity, peatland rehabilitation and public access. Please refer to **Chapter 4**, **Chapter 6, Chapter 7** and **Appendix 6-5** of the EIAR for further details.
	BLP-30 It is Council policy to integrate the provision of green infrastructure with infrastructure provision and replacement, including walking and cycling routes, as appropriate, while protecting natural heritage.	
	BLP-14 - It is Council policy to protect the county's designated peatland areas and landscapes, including any historical walkways through bogs and to conserve their ecological, archaeological, and cultural heritage and to develop educational heritage.	
	BLP-16 It is Council policy to support the provision of outdoor pursuits, walking and cycling routes through the county's peatlands and network of industrial railways linking the River Shannon Blueway, Royal Canal, Grand Canal, and Barrow Blueway across the midlands as outlined in the 'Major Cycling Destination in the Midlands of Ireland –Feasibility Study 2016', which is a priority of the 'Outdoor Recreation Plan State Lands and Waters' (2017).	
	BLP-18 It is Council policy to support collaboration between Offaly County Council, Regional Transition Team and relevant stakeholders of a partnership approach to integrated peatland management for a just transition that	

Policy Theme	Policy/ Objective	Compliance
	incorporates the management, rehabilitation and restoration / re-wetting of significant tracts of peatlands in conjunction with appropriate developed after uses.	
	BLO-11 It is an objective of the Council to work with relevant stakeholders on suitable peatland sites in order to demonstrate best practice in sustainable peatland conservation, management and restoration techniques to promote their heritage and educational value subject to ecological impact assessment and appropriate assessment screening.	
	TRP-16 It is Council policy to support the extension of greenways, blueways, peatways and trails within the county and the integration and linkage of them with other existing / proposed greenways, blueways, peatways and trails both within and outside County Offaly.	
	TRO-12 It is an objective of the Council 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 education facilities.	
Reasonable Alternatives	**CAEP-23** It is Council policy to require that environmental assessments should address reasonable alternatives for the location of new energy developments, and where existing infrastructural assets such as sub-stations, power lines and roads already exist within the proposed development areas, then such assets should be considered for sustainable use by the proposed development where the assets have capacity to absorb the new development.	**Chapter 3** of the EIAR contains a description of the reasonable alternatives that were assessed, which are relevant to the Proposed Project and its specific characteristics, in terms of site location and other renewable energy technologies as well as site layout incorporating size and scale of the Proposed Project, connection to the national grid and transport route options to the site. **Chapter 3** also outlines the design considerations in relation to the Proposed Wind Farm and the Proposed Grid Connection. It provides an

Policy Theme	Policy/ Objective	Compliance
		indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects. Please refer to **Chapter 3** of the EIAR for further details.
Population and Human Health	**ENVP-24** It is Council policy to assess, as relevant, proposals for development in terms of, inter alia, potential impact on existing adjacent developments, existing land uses and/or the surrounding landscape. Where proposed developments would be likely to have a significant adverse effect on the amenities of the area through pollution by noise, fumes, odours, dust, grit or vibration, or cause pollution of air, water and/or soil, mitigation measures shall be introduced in order to eliminate adverse environmental impacts or reduce them to an acceptable operating level. Application of this policy will take into account instances whereby activities are licensed by other bodies through other processes (such as Integrated Pollution Control Licensing or Industrial Emissions Licensing).	**Chapter 5** of the EIAR identifies, describes and assesses the potential significant, direct and indirect effects of the Proposed Project on population and human health and has been completed in accordance with the guidance set out by the Environmental Protection Agency (EPA), in particular the '*Guidelines on the Information to be Contained in Environmental Impact Assessment Reports*' (EPA, 2022). **Chapter 5** concludes that potential for negative health effects associated with the Proposed Project is slight to imperceptible. Furthermore, the Proposed Wind Farm is capable of offsetting carbon emissions associated with the burning of fossil fuels. During the operational stage, the Proposed Wind Farm will have a long term, significant positive effect on air quality which will contribute to positive effects on human health and assist in Ireland reaching its emissions targets and renewable energy goals. Please refer to **Chapter 3**, **Chapter 5**, and **Chapter 10** of the EIAR for further details.
Economic Development	**ENTP-24** It is Council policy to actively encourage the redevelopment of sites with antecedent uses or disused sites which were formerly ESB plants and Bord na Móna works for enterprise and employment creation.	The Proposed Wind Farm is located on a post-industrial peatland site formerly used for commercial peat extraction by BnM. The Proposed Wind Farm represents a future use which will generate employment in the renewable energy sector.

Policy Theme	Policy/ Objective	Compliance
		As detailed in **Chapter 5** of the EIAR, there will be a positive, moderate, short-term, direct effect on employment levels during the construction phase (estimated to be 30-36 months) and a positive, slight, short-term effect on investment and employment in the local and wider regions due to the contributions paid to the OCC at the commencement of the construction phase. Up to approximately 200-250 jobs are likely to be created during the construction phase of the Proposed Project.
	ENTP-45 It is Council policy to support the creation of quality green jobs which are sustainable over the longer-term.	As detailed in **Chapter 5** of the EIAR, the design, construction, operation and decommissioning of the Proposed Project will provide employment for technical consultants, contractors and maintenance staff. These are high-quality jobs in a green industry. The Proposed Project is likely to create up to 200-250 jobs during the construction phase. The majority of construction workers will be sourced locally, thereby helping to sustain employment in the construction trade. Where appropriate, engineering fill and higher quality, surfacing granular fill and sand will be sourced from local, authorised quarries.
	ENTP-47 It is Council policy to support and promote the development of economic and enterprise development and activity in a manner which contributes to the transition to a low carbon, climate resilient and environmentally sustainable county.	The Proposed Project is a significant investment in renewable energy infrastructure in County Offaly which directly contributes to OCC's aim of transitioning to a low-carbon, climate-resilient and environmentally sustainable county.
	REDP-09 It is Council policy to facilitate the development of the rural economy through supporting sustainability and economic efficiency in agriculture and diversification into alternative on-farm and off-farm activities such as the food	The Proposed Project supports the sustainable development of the rural economy through renewable energy while protecting natural

Policy Theme	Policy/ Objective	Compliance
	and drinks sector, forestry, horticulture, crafts, agri-business, fishing, aquaculture, waste management, rural tourism, renewable energy and the bio-economy, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism.	heritage and landscape, as demonstrated in **Chapter 6**, **Chapter 13** and **Chapter 14** of the EIAR.
	REDP-11 As part of Offaly County Council's recognition of the contribution that rural areas make to social and economic wellbeing, it is Council policy to support and protect existing rural economies such as (i) valuable agricultural lands to ensure sustainable food supply, (ii) the value and character of the open countryside and (iii) the diversification of rural economies to create additional jobs and maximise opportunities in emerging sectors, such as agri-business, renewable energy, tourism, and forestry enterprise.	The Proposed Project will create employment in the renewable energy sector, helping to diversify the rural economy. As detailed in **Chapter 5** of the EIAR, the design, construction, operation and decommissioning of the Proposed Project will provide employment for technical consultants, contractors and maintenance staff. These are high-quality jobs in a green industry. The Proposed Project is likely to create up to 200 - 250 jobs during the construction phase.
	REDP–17 It is Council policy to support the development of renewable energy in rural areas, where it is considered appropriate i.e. where it is demonstrated that such development would not result in significant environmental effects. Such development will be assessed on a case-by-case basis.	**REDP-17** directly supports the Proposed Project which is a renewable energy project in a rural area. A comprehensive EIAR has been prepared for the Proposed Project, which identifies, describes and assesses the likely significant effects on the environment during the construction, operational and decommissioning phases. The EIAR identifies both significant positive and significant negative environmental effects associated with the Proposed Project.
Biodiversity	**BLP-01** It is Council policy to protect, conserve, and seek to enhance the county's biodiversity and ecological connectivity.	The Proposed Project aligns with the aims of OCC in relation to the protection and conservation of biodiversity and ecological connectivity. **Chapter 6** of the EIAR concludes that provided that the Proposed Project is constructed and operated in accordance with the design, best practice and mitigation measures that are described within this application, significant individual or cumulative effects on ecology are not anticipated.
	BLP-02 It is Council policy to conserve and protect habitats and species listed in the Annexes of the EU Habitats Directive (92/43/EEC) (as amended) and the Birds Directive (2009/147/EC), the Wildlife Acts 1976 (as amended) and the Flora Protection Orders.	

Policy Theme	Policy/ Objective	Compliance
	BLP-03 It is Council policy to support and co-operate with statutory authorities and others in support of measures taken to manage proposed or designated sites in order to achieve their conservation objectives.	As part of the Proposed Project, a number of biodiversity management and enhancement measures are proposed, including peatland enhancement, woodland planting, management of marsh fritillary habitat and the creation of pollinator-friendly corridors through the part of the Project Site located within part of the Allen Bog Group (see BMP**, Appendix 6-5**), supporting the objectives of the OCDP and enhancing the overall biodiversity of the Project Site. Chapter 7 of the EIAR assesses the potential effects of the Proposed Project on birds, including species listed on Annex I of the Birds Directive and Red-listed Birds of Conservation Concern in Ireland. Significant effects identified prior to mitigation for golden plover, wintering hen harrier, whooper swan, breeding lapwing and snipe are addressed through mitigation, offsetting at the Lodge Bog Enhancement Area and Killina Offsetting Area, and operational monitoring with turbine curtailment where required (see BMP, **Appendix 6-5**). Chapter 7 concludes that, with these measures in place, significant residual or cumulative effects on any Key Ornithological Receptor (KOR) are not anticipated. A comprehensive AA Screening and NIS have been submitted with this application which includes an assessment of all potential direct or indirect adverse effects on European Sites. The NIS objectively concluded that the Proposed Project, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site. Additionally, potential for impacts on local water quality has been identified and appropriate mitigation measures have been applied to prevent impacts in this regard. No potential for cumulative effects

Policy Theme	Policy/ Objective	Compliance
		when considered in-combination with the Proposed Project was identified. Please refer to **Chapter 6, Chapter 7** and **Chapter 9** of the EIAR for further details.
	BLP-04 It is Council policy to protect and maintain the conservation value of all existing and future Natural Heritage Areas, proposed Natural Heritage Areas, Nature Reserves, Ramsar Sites, Wildfowl Sanctuaries and Biogenetic Reserves in the county.	The potential impacts of the Proposed Project on NHAs, pNHAs and other ecologically sensitive sites are assessed in **Chapter 6** of the EIAR. **Chapter 6** concludes that provided that the Proposed Project is constructed and operated in accordance with the design, best practice and mitigation measures that are described within this application, significant individual or cumulative effects on ecology are not anticipated.
	BLP-05 It is Council policy to ensure that development does not have a significant adverse impact, incapable of satisfactory avoidance or mitigation, on plant, animal or bird species protected by law.	The EIAR assesses all habitats and species protected by either Irish or European law. **Chapter 6** of the EIAR concludes that provided that the Proposed Project is constructed and operated in accordance with the design, best practice and mitigation measures that are described within this application, significant individual or cumulative effects on ecology are not anticipated. **Chapter 7** of the EIAR concludes that the Proposed Project will not result in any significant effects on any of the identified KORs. No significant effects on receptors of International, National or County Importance were identified. Provided that the Proposed Project is constructed, operated and decommissioned in accordance with the design, best practice mitigation and enhancement measures that are described within this application, significant individual or cumulative effects on the identified KORs are not anticipated.

Policy Theme	Policy/ Objective	Compliance
	BLP-06 It is Council policy to consult with the National Parks and Wildlife Service, and take account of any licensing requirements, when undertaking, approving or authorising development which is likely to affect plant, animal or bird species protected by law.	Consultation with the National Parks and Wildlife Service have informed the assessments undertaken in relation to the Proposed Project. **Chapter 6**, **Chapter 7** and **NIS** of the EIAR identify the measures required to protect species and habitats, and any licences required in respect of protected species will be obtained prior to the relevant works.
	BLP-07 It is Council policy to support the implementation of the National Biodiversity Action Plan 2017- 2021 and the Offaly Heritage Plan Key Actions 2017-2021 and future editions in partnership with relevant stakeholders subject to available resources.	The Proposed Project supports the objectives of the National Biodiversity Action Plan through the biodiversity enhancement and monitoring measures set out in the EIAR. The BMP in **Appendix 6-5** includes peatland enhancement, native woodland planting, marsh fritillary habitat management and pollinator-friendly corridors. The BMP also provides for habitat restoration and creation for breeding waders and wintering golden plover, whooper swan and hen harrier at the Lodge Bog Enhancement Area and Killina Offsetting Area. In addition, the Applicant proposes to submit monitoring survey data to organisations such as the National Biodiversity Data Centre to contribute to the upcoming bird atlas (2027) and other ongoing research, contributing to Objective 4 of the 4th National Biodiversity Action Plan (see **Chapter 7** of the EIAR).
	BLP-20 It is Council policy to preserve riparian buffer strips free from development by reserving a minimum of 10 metres either side of all watercourses (measured from top of bank) with the full extent of the protection determined on a case-by-case basis by the Council, based on site specific characteristics and sensitivities.	The layout of the Proposed Project was informed by 50m buffer zones around natural watercourses. Where works are necessary inside the 50m buffer zones, including at watercourse crossings, additional mitigation such as double silt fencing will be implemented. There will be no direct discharge to natural watercourses, and runoff from works areas will be attenuated and treated before being dispersed over vegetated areas.

Policy Theme	Policy/ Objective	Compliance
		Chapter 9 of the EIAR concludes that, with the proposed mitigation measures in place, no significant effects on the hydrological and hydrogeological environment are anticipated.
	BLP-21 It is Council policy to promote clear span bridging structures as the preferred option for culverts Any development proposal requiring culverting should also document stream habitat lost and provide compensatory habitat where possible. Realignment of water courses should incorporate stream enhancement measures, as outlined in Office of Public Works Environmental Guidance. The Council will consult with Inland Fisheries Ireland in relation to riparian and instream works as appropriate.	The routes of natural watercourses will not be altered as part of the Proposed Project. The existing Figile River crossings will be replaced with clear-span bridges, and other new watercourse crossings will use clear-span structures or bottomless/oversized embedded culverts. Crossing works will follow relevant OPW and Inland Fisheries Ireland guidance. Please refer to **Chapter 6** and **Chapter 9** of the EIAR for further details.
	BLP-22 It is Council policy to promote the removal of historic culverts and infilling of watercourses.	No infilling or realignment of natural watercourses is proposed. The routes of natural watercourses will not be altered as part of the Proposed Project. The existing Figile River crossings will be replaced with clear-span bridges, and other new watercourse crossings will use clear-span structures or bottomless/oversized embedded culverts. Please refer to **Chapter 4** and **Chapter 9** of the EIAR for further details.
	BLP-23 It is Council policy to consider the Waterways Corridor Study 2002 and protect the recreational, educational and amenity potential of navigational and non-navigational waterways within the county, such as the Grand Canal Corridor, towpaths and adjacent wetland landscapes, taking into account more recent heritage and environmental legislation (including the SEA Directive) and environmental policy commitments.	The potential effects of the Proposed Project on the Grand Canal and other waterways have been assessed in **Chapter 6** and **Chapter 9** of the EIAR. The Proposed Turbines are set back approximately 880m from the canal corridor.

Policy Theme	Policy/ Objective	Compliance
	BLP-24 It is Council policy to support the protection and management of existing networks of woodlands, trees and hedgerows which are of amenity or biodiversity value and/or contribute to landscape character, and to strengthen local networks.	Tree felling and vegetation removal have been limited to the areas required for the Proposed Project, with woodland and scrub outside the construction footprint protected from works. The BMP in **Appendix 6-5** also provides for the creation of approximately 45.3 hectares of native woodland habitat. The Proposed Project includes provision of approximately 55.2 km of amenity tracks, including dedicated walking trails and boardwalk infrastructure, which will provide opportunities for the public to access and appreciate the natural peatland environment and surrounding landscape. The proposed amenity access tracks will include for 9 no. waymarked circular walking trails ranging from 1.3km to 21km and will enable connections to neighbouring sites of interest including Killinthomas Wood (to the south), the Grand Canal (to the North) and Cloncreen Wind Farm (to the west). The Proposed Project will therefore contribute to strengthening local amenity networks while facilitating public appreciation of the area's natural heritage, biodiversity and landscape character.
	BLP-25 It is Council policy to encourage the planting of native species in all new residential developments (individual and multiple units) and as part of landscaping for commercial and industrial developments.	Native species planting forms part of the proposed mitigation, offsetting and enhancement measures for the Proposed Project. The BMP in **Appendix 6-5** provides for approximately 45.3 hectares of native woodland habitat, including the felling of conifer plantation and replanting with native species. It also provides for the enhancement of cutover bog, the management and enhancement of marsh fritillary habitat, and the creation of pollinator-friendly corridors to improve linear connectivity across the Project Site. In relation to birds, native scrub mosaic will be created within 250m of the Proposed Turbines to discourage open-habitat species from

Policy Theme	Policy/ Objective	Compliance
		these areas. These measures are offset by the Proposed Enhancement Areas. At the Lodge Bog Enhancement Area, measures include scrub management, the creation of permanent waterbodies and reedbeds, and breeding wader areas protected by predator-proof fencing. At the Killina Offsetting Area, conifer plantation will be reverted to open peatland habitat managed for waders. Please refer to **Chapter 6, Chapter 7** and **Appendix 6-5** of the EIAR for further details.
	BLP-26 It is Council policy to require, where practical, the management of mature trees, such as tree surgery instead of felling particularly where the trees contribute to amenity.	Clear-felled forestry and vegetation removal has been minimised through the design of the Proposed Project and is limited to the areas required for infrastructure. Woodland and scrub outside the construction footprint will be fenced off and protected from works.
	BLP-34 It is Council policy to continue to deliver and support measures for the prevention, control and/or eradication of invasive species within the county, and to seek details of how these species will be managed and controlled where their presence is identified.	Invasive species were recorded and assessed as part of the ecological surveys. Japanese knotweed is located more than 350m from the nearest Proposed Project infrastructure and will not be disturbed. Biosecurity measures will be implemented to prevent the spread of invasive species. Please refer to **Chapter 6** of the EIAR for further details.
	BLO-01 It is an objective of the Council that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation and the sustainable management of County Offaly's natural capital.	As demonstrated by the findings of the EIAR and the mitigation measures set out within, the Proposed Project will be capable of being constructed and decommissioned without likely significant effects on the environment. Significant negative effects will occur during the operational phase as a result of landscape and visual effects on residential receptors in proximity to the Proposed Turbines and in relation to use of the Proposed Wind Farm site for low flying training activities by the Air Corp. Significant positive effects will

Policy Theme	Policy/ Objective	Compliance
		occur in relation to air quality and climate and the renewable electricity that will be provided to the national grid as part of the operation of the Proposed Project.
	BLO-02 It is an objective of the Council that no plans, programmes or projects giving rise to significant cumulative, direct, indirect or secondary impacts on European sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan (either individually or in combination with other plans, programmes, etc. or projects).	Other plans and projects are cumulatively assessed with the Proposed Project in the cumulative effects section of each relevant EIAR chapter. The methodology for identifying cumulative plans and projects is detailed in **Chapter 2** of the EIAR. The NIS also assesses cumulative effects and concludes that the Proposed Project will not adversely affect the integrity of any European Site, either alone or in combination with other plans or projects.
	BLO-03 It is an objective of the Council that all projects and plans arising from this Plan will be screened for the need to undertake Appropriate Assessment under Article 6 of the Habitats Directive. A plan or project will only be authorised after the competent authority has ascertained, based on scientific evidence, Screening for Appropriate Assessment, and subsequent Appropriate Assessment where necessary, that: 1. The plan or project will not give rise to significant adverse direct, indirect or secondary effects on the integrity of any European site (either individually or in combination with other plans or projects); or 2. The plan or project will have significant adverse effects on the integrity of any European site (that does not host a priority natural habitat type/and or a priority species) but there are no alternative solutions and the plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all	The impact of the Proposed Project on designated sites is considered in full in the NIS accompanying this application. The NIS objectively concluded that the Proposed Project, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site.

Policy Theme	Policy/ Objective	Compliance
	compensatory measures necessary to ensure the protection of the overall coherence of Natura 2000; or 3. The plan or project will have a significant adverse effect on the integrity of any European site (that hosts a natural habitat type and/or a priority species) but there are no alternative solutions and the plan or project must nevertheless be carried out for imperative reasons for overriding public interest, restricted to reasons of human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of Natura 2000.	
	BLO-04 It is an objective of the Council to ensure that the impact of development within or adjacent to national designated sites, Natural Heritage Areas, proposed Natural Heritage Areas, Ramsar Sites and Nature Reserves likely to result in significant adverse effects on the designated site is assessed by requiring the submission of an Ecological Impact Assessment prepared by a suitably qualified professional, which should accompany planning applications.	The potential impacts of the Proposed Project on NHAs, pNHAs and other ecologically sensitive sites are assessed in **Chapter 6** of the EIAR. **Chapter 6** concludes that provided that the Proposed Project is constructed and operated in accordance with the design, best practice and mitigation measures that are described within this application, significant individual or cumulative effects on ecology are not anticipated. Please refer to **Chapter 6** and **Chapter 9** of the EIAR for further details.
	BLO-05 It is an objective of the Council in accordance with Article 4(4) of the Birds Directive and Regulation 27(4) of the European Communities (Birds and Habitats) Regulations 2011-2015 to strive to avoid pollution or deterioration of bird habitats outside Special Protection Areas.	The Proposed Project aligns with the aims of OCC in relation to the protection and conservation of biodiversity and ecological connectivity. **Chapter 6** of the EIAR concludes that provided that the Proposed Project is constructed and operated in accordance with the

Policy Theme	Policy/ Objective	Compliance
	BLO-06 It is an objective of the Council to take account of the objective and management practices proposed in any management or related plans for European Sites (SACs and SPAs) in and adjacent to the county published by the Department including the National Raised Bog Special Areas of Conservation (SACs) Management Plan 2017-2022 and any subsequent editions.	design, best practice and mitigation measures that are described within this application, significant individual or cumulative effects on ecology are not anticipated. As part of the Proposed Project, a number of biodiversity management and enhancement measures are proposed, including peatland enhancement, woodland planting, management of marsh fritillary habitat and the creation of pollinator-friendly corridors through the Proposed Wind Farm site (see BMP, **Appendix 6-5**), supporting the objectives of the OCDP and enhancing the overall biodiversity of the Project Site. **Chapter 7** of the EIAR identifies the cutover peatland habitats of the Allen Bog Group as supporting important bird populations, including wintering golden plover, whooper swan and hen harrier, and breeding lapwing, snipe and curlew. To avoid deterioration of these habitats, the Proposed Project incorporates construction-phase measures to protect nesting and roosting birds, water protection measures, and offsetting of habitat loss at the Lodge Bog Enhancement Area and Killina Offsetting Area, with bird monitoring throughout the operational phase (**Appendix 7-7**). No significant residual effects on any KOR are predicted. A comprehensive AA Screening and NIS have been submitted with this application which includes an assessment of all potential direct or indirect adverse effects on European Sites. The NIS objectively concluded that the Proposed Project, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site.
	BLO-12 It is an objective of the Council to maintain a riparian zone for larger and smaller river channels based on the Inland Fisheries Ireland updated guideline document, 'Planning for Watercourses in the Urban Environment, a Guide to the Protection of Watercourses through the use of Buffer Zones, Sustainable Drainage Systems, Instream Rehabilitation, Climate / Flood Risk and Recreational Planning'.	
	BLO-14 It is an objective of the Council to preserve individual trees and groups of trees that are included in Table 4.13 and 4.14 of the County Development Plan.	
	BLO-16 It is an objective of the Council to encourage the preservation and enhancement of native and semi-natural woodlands, groups of trees and individual trees, not listed in Table 4.13 and 4.14; (a) in particular, on the grounds of Country Houses, Gardens and Demesnes and on approaches to settlements in the county; and (b) as part of the development management process, require the planting of native, deciduous, pollinator friendly trees in all new developments where possible.	
	BLO-17 It is an objective of the Council to encourage pursuant to Article 10 of the Habitats Directive, the management of features of the landscape, such as traditional field boundaries, important for the ecological coherence of the Natura 2000 network and essential for the migration, dispersal and genetic exchange of wild species.	

Policy Theme	Policy/ Objective	Compliance
	BLO-18 It is an objective of the Council to encourage the retention, wherever possible, of hedgerows and other distinctive boundary treatment in the county. Where removal of a hedgerow, stone wall or other distinctive boundary treatment is unavoidable, provision of the same type of boundary will be required of similar length and set back within the site in advance of the commencement of construction works on the site (unless otherwise agreed by the Planning Authority).	Additionally, potential for impacts on local water quality has been identified and appropriate mitigation measures have been applied to prevent impacts in this regard. No potential for cumulative effects when considered in-combination with the Proposed Project was identified. Please refer to **Chapter 6** and **Chapter 9** of the EIAR for further details.
	BLO-20 It is an objective of the Council to require, as part of the planning application process, the appropriate eradication/control of invasive species when identified on site or in the vicinity of a site, in accordance with Regulation 49 of the European Communities (Birds and Natural Habitats) Regulations 2011 to 2015.	Invasive species were recorded and assessed as part of the ecological surveys. Japanese knotweed is located more than 350 metres from the nearest Proposed Project infrastructure and will not be disturbed, while the Grand Canal crossing will be completed by horizontal directional drilling with no in-stream works. Biosecurity measures will be implemented to prevent the spread of invasive species. Please refer to **Chapter 6** of the EIAR for further details.
	BLO-21 It is an objective of the Council to continue to maintain mapping identifying the location of invasive species in the county in conjunction with the National Biodiversity Data Centre.	
	BLP-32 It is Council policy to support the aims and objectives of the All Ireland Pollinator Plan 2021- 2025 and any subsequent editions by delivering appropriate management actions as set out in their guidance documents.	Records held by the National Biodiversity Data Centre informed the ecological baseline assessment. The Applicant proposes to submit ornithological monitoring survey data to organisations such as the National Biodiversity Data Centre to contribute to the upcoming bird atlas (2027). Please refer to **Chapter 6** and **Chapter 7** of the EIAR for further details.

Policy Theme	Policy/ Objective	Compliance
	BLP-33 It is Council policy to support alternative landscape maintenance regimes which promote and work towards the reduction and ultimate elimination of use of herbicides in Parks and public land, while supporting the National Bee Pollinator Plan in promoting bee friendly habitats.	The BMP in **Appendix 6-5** provides for the management and enhancement of suitable marsh fritillary habitat, the creation of pollinator-friendly corridors and native woodland planting. These measures will improve habitat connectivity and provide additional habitat for pollinating species within the Project Site. Please refer to **Chapter 6** of the EIAR for further details.
	BLP-09 It is Council policy to protect from inappropriate development and maintain the character, integrity and conservation value of features or areas of geological interest as contained in the scheduled list of geological heritage sites identified in Table 4.11 Offaly Geological Sites.	
Lands, Soils and Geology	**BLO-10** It is an objective of the Council to require the preparation and submission of a Hydrological Report/Assessment for significant developments within and in close proximity to protected raised bogs and to take account of same in the assessment of impacts on the integrity of peatland ecosystems.	The Proposed Project is not located within a geological heritage site identified in Table 4.11 Offaly Geological Sites.
Hydrology and Hydrogeology	**ENVP-01** It is Council policy to ensure that the Water Framework Directive, the River Basin Management Plan and any subsequent Water Management Plans are fully considered throughout the planning process.	A Hydrology and Hydrogeology assessment has been included in **Chapter 9** of the EIAR.
	ENVP-02 It is Council policy to manage, protect and enhance surface water and ground water quality to meet the requirements of the Water Framework Directive.	The Water Framework Directive and the River Basin Management Plan are fully considered in **Appendix 9-4** and **Chapter 9** of the EIAR.
	ENVP-03 It is Council policy to support the implementation of the Water Framework Directive, the River Basin Management Plan and the Local Authority Waters Programme in achieving and maintaining at least good environmental status for all water bodies in the county. Development proposals shall not have an unacceptable impact on the water environment, including surface waters, groundwater quality and quantity, river corridors and associated woodlands.	**Chapter 9** of the EIAR includes a Water Framework Directive (WFD) Compliance Assessment Report (see **Appendix 9-4** of the EIAR). A full assessment of the potential effects of the Proposed Project on the status of the receiving waterbodies is included in the WFD Compliance Assessment Report.

Policy Theme	Policy/ Objective	Compliance
	ENVP-04 It is Council policy that in assessing applications for developments, that consideration is had to the impact on the quality of surface waters having regard to targets and measures set out in the River Basin Management Plan, and any subsequent local or regional plans.	**Chapter 9** of the EIAR provides a baseline assessment of the environmental setting of the Project Site in terms of hydrology and hydrogeology and discusses the potential likely significant effects that the construction, operation and decommissioning of the Proposed Project will have. **Chapter 9** concludes that, with appropriate mitigation measures in place, no significant effects on the hydrological and hydrogeological environment are envisaged.
	WSP-22 It is Council policy to ensure adequate surface water drainage systems are in place which meet the requirements of the Water Framework Directive and the River Basin Management Plan and to promote the use of Sustainable Drainage Systems.	The Water Framework Directive and the River Basin Management Plan are fully considered in **Chapter 9** of the EIAR (see **Appendix 9-4** of the EIAR).
	ENVP-07 It is Council policy to protect groundwater sources through the implementation of the Groundwater Protection Scheme and Source Protection Zones. Development proposals within these zones which have the potential to pose a risk to groundwater will be required to demonstrate that no reasonable alternative site is available and that groundwater quality will be protected to the satisfaction of the Council.	Surface water drainage measures are shown on the drainage drawings provided in the planning drawing pack and detailed within **Chapter 9** of the EIAR. With the surface water drainage mitigation measures in place, no significant effects on surface water or groundwater quality are envisaged. Please refer to **Section 4.7** of **Chapter 4**, Appendix 9-5 and **Chapter 9** of the EIAR for further details.
	ENVP-17 It is Council policy to manage air quality in accordance with relevant legislation and policy.	The potential impacts of the Proposed Project on groundwater are assessed in **Chapter 9** of the EIAR.
Air Quality	**ENVP-18** It is Council policy to promote the preservation of best ambient air quality compatible with sustainable development in accordance with the EU ambient Air Quality and Cleaner Air for Europe (CAFE) Directive (2008/50/EC) and ensure that all air emissions associated with new developments are within	**Chapter 10** of the EIAR identifies, describes and assesses the potential significant direct and indirect effects on air quality arising from the construction, operation and decommissioning of the Proposed Project.

Policy Theme	Policy/ Objective	Compliance
	Environmental Quality Standards as set out in the Air Quality Standards Regulations 2011, or any updated/superseding documents. **ENVP-19** It is Council policy to require activities likely to give rise to air emissions to implement measures to control such emissions and to undertake air quality monitoring. Application of this policy will take into account instances whereby activities are licensed by other bodies through other processes (such as Integrated Pollution Control Licensing or Industrial Emissions Licensing).	**Chapter 10** considers the Clean Air for Europe (CAFE) Directive (Directive 2008/50/EC on ambient air quality and cleaner air for Europe) (as amended by Directive EU 2015/1480) and the Air Quality Standards Regulations 2011 (S.I. No. 180 of 2011) as amended by the Air Quality Standards (Amendments) and Arsenic, Cadmium, Mercury, Nickel and Polycyclic Aromatic Hydrocarbons in Ambient Air Regulations, 2016 (S.I. 659 2016). **Chapter 10** concludes that the production of energy from wind turbines has no direct air emissions as is expected from fossil fuel-based power stations. Harnessing more energy by means of renewable sources will reduce dependency on fossil fuels, thereby resulting in a reduction in harmful emissions that can be damaging to human health and the environment. Some temporary or short-term indirect emissions associated with the construction of the Proposed Project will include vehicular and dust emissions. Please refer to **Chapter 10** of the EIAR for further details.
	ENVO-09 It is an objective of the Council to reduce harmful emissions and achieve and maintain good air quality for the county.	**Chapter 10** of the EIAR identifies, describes and assesses the potential significant direct and indirect effects on air quality arising from the construction, operation and decommissioning of the Proposed Project. A Construction and Environmental Management Plan (CEMP) will be in place throughout the construction phase (see **Appendix 4-4** of the EIAR). The CEMP includes dust suppression measures. In addition, turbines and construction vehicles will be transported to the Site on specified haul routes only, which will be regularly inspected for cleanliness and cleaned, as necessary.

Policy Theme	Policy/ Objective	Compliance
		Please refer to **Chapter 10** and **Appendix 4-4** of the EIAR for further details.
	ENVO-10 It is an objective of the Council to actively promote measures to reduce air pollution and combat climate change including promotion of energy efficient buildings, cleaner home heating, green infrastructure, active and public transport modes, electric vehicles and innovative design solutions.	The Proposed Project will generate clean, renewable electricity, reducing reliance on greenhouse gas emitting fossil fuels and improving the sustainability and security of the energy system. **Chapters 10** and **Chapter 11** of the EIAR conclude that operation of the Proposed Project will result in a net reduction in carbon dioxide emissions. The Proposed Project will have a long-term, significant positive effect on air quality and climate, displacing approximately 146,857 tonnes of CO2 per annum, or 5,139,995 tonnes of CO2 over its 35-year operational life. . Please refer to **Chapters 10** and **Chapter 11** of the EIAR for further details.
	ENVP-21 It is Council policy to promote the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life. Planning permission will not normally be granted for new uses / development or extensions of existing uses that produce significant and unacceptable levels of noise and/or vibration at site boundaries or within adjacent noise sensitive areas, especially residential areas.	
Noise	**ENVP-23** It is Council policy to require that the design of lighting schemes minimises the incidence of light pollution into the surrounding environment. New schemes shall ensure that there is no unacceptable adverse impact on residential or visual amenity and biodiversity in the surrounding area.	**Chapter 12** of the EIAR assesses construction, operational and decommissioning noise effects on local residential amenity. The assessment considers compliance with the relevant noise criteria and identifies the applicable mitigation and monitoring measures. Please refer to **Chapter 12** of the EIAR for further details.
Light Pollution	**BLP-35** It is Council policy to protect and preserve the county's Areas of High Amenity namely the Slieve Bloom Mountains, Clonmacnoise Heritage Zone, Durrow High Cross, Abbey and surrounding area, the River Shannon, Lough Boora Discovery Park, Grand Canal, Croghan Hill, Raheenmore Bog, Pallas	External lighting associated with the Proposed Project will be limited to that required for safety, security and aviation compliance. Where aviation warning lighting is required, it will be provided in

Policy Theme	Policy/ Objective	Compliance
	Lake, Clara Bog, Clara eskers, Eiscir Riada and other eskers. Notwithstanding the location of certain settlements, or parts of, for which there are settlement plans (Towns, Villages, Sráids), within the Areas of High Amenity, it is not the intention of this policy to hinder appropriate sustainable levels of development (as set out in the plans and subject to proper planning).	accordance with the requirements of the relevant aviation authorities and designed to minimise unnecessary light spill. Please refer to **Chapter 4** and **Chapter 16** of the EIAR for further details.
Landscape and Visual	**BLP-36** - It is Council policy, to ensure that issues of scale, siting, design, and overall compatibility (including particular regard to environmental sensitivities) with a site's location within an Area of High Amenity are of paramount importance when assessing any application for planning permission. The merits of each proposal will be examined on a case-by case basis.	The LVIA presented in **Chapter 13** of the EIAR assesses the potential effects of the Proposed Project on County Offaly's Areas of High Amenity, including the Grand Canal, Croghan Hill and the county's eskers. The Proposed Turbines are set back approximately 880m from the Grand Canal and will be substantially screened along much of the canal corridor. The assessment concludes that the Proposed Turbines will not significantly affect the integrity of the immediate landscape setting or the protected views towards Croghan Hill.
	BLP-38 It is Council policy to protect and enhance the county's landscape, by ensuring that development retains, protects and where necessary, enhances the appearance and character of the county's existing landscape.	
	BLP-39 It is Council policy to seek to ensure that local landscape features, including historic features and buildings, hedgerow, shelter belts and stone walls, are retained, protected, and enhanced where appropriate, so as to preserve the local landscape and character of an area, whilst providing for future development.	
	BLP-40 *It is Council policy to ensure that consideration of landscape sensitivity is an important factor in determining development uses.*	
	BLP-41 It is Council policy to require a Landscape/Visual Impact Assessment to accompany significant proposals, located within or adjacent to sensitive landscapes. This assessment will provide details of proposed mitigation measures to address likely negative impacts.	

Policy Theme	Policy/ Objective	Compliance
	BLP-43 It is Council policy to require a Landscape/Visual Impact Assessment to accompany significant proposals that are likely to significantly affect Key Scenic Views and Prospects as listed in Table 4.21 and Key Amenity Routes as listed in Table 4.22.	
	BLO-22 It is an objective of the Council to ensure that new development, whether individually or cumulatively, does not impinge in any significant way on the character, integrity, and distinctiveness of or the scenic value of the Areas of High Amenity listed in Table 4.17. New development in Areas of High Amenity shall not be permitted if it: › Causes unacceptable visual harm; › Introduces incongruous landscape elements; and › Causes the disturbance or loss of (i) landscape elements that contribute to local distinctiveness; (ii) historic elements that contribute significantly to landscape character and quality such as field or road patterns; (iii) vegetation which is a characteristic of that landscape type and (iv) the visual condition of landscape elements.	
	BLO-24 It is an objective of the Council to have regard to the Landscape Sensitivity Areas in Tables 4.18, 4.19 and 4.20 in the consideration of planning applications.	
	BLO-25 It is an objective of the Council to protect skylines and ridgelines from development where such developments will create significant visual intrusion.	The LVIA presented in **Chapter 13** of the EIAR assesses designated views, hilltop views and scenic routes using ZTV mapping, route screening, photomontages and site appraisal. Significant visual effects are limited to a small number of elevated viewpoints and short sections of scenic routes. The layout was refined through the removal
	BLO-26 It is an objective of the Council to protect Key Scenic Views and Key Prospects contained in Table 4.21, and Key Amenity Routes as listed in Table 4.22 from inappropriate development.	

Policy Theme	Policy/ Objective	Compliance
	BLO-27 It is an objective of the Council to ensure that proposed developments take into consideration their effects on views from Key Scenic Views and Prospects and Key Amenity Routes and are designed and located to minimise their impact on this views and prospects.	of visually disconnected turbines and the use of lower turbine tip heights around the outer parts of the Proposed Wind Farm.
	BLP-35 It is Council policy to protect and preserve the county's Areas of High Amenity namely the Slieve Bloom Mountains, Clonmacnoise Heritage Zone, Durrow High Cross, Abbey and surrounding area, the River Shannon, Lough Boora Discovery Park, Grand Canal, Croghan Hill, Raheenmore Bog, Pallas Lake, Clara Bog, Clara eskers, Eiscir Riada and other eskers. Notwithstanding the location of certain settlements, or parts of, for which there are settlement plans (Towns, Villages, Sráids), within the Areas of High Amenity, it is not the intention of this policy to hinder appropriate sustainable levels of development (as set out in the plans and subject to proper planning).	
	BLP-36 It is Council policy, to ensure that issues of scale, siting, design, and overall compatibility (including particular regard to environmental sensitivities) with a site's location within an Area of High Amenity are of paramount importance when assessing any application for planning permission. The merits of each proposal will be examined on a case-by case basis.	The LVIA presented in **Chapter 13** of the EIAR assesses the potential effects of the Proposed Project on Offaly's Areas of High Amenity, including the Grand Canal, Croghan Hill and the county's eskers. The Proposed Turbines are set back approximately 880m from the Grand Canal and will be substantially screened along much of the canal corridor. The assessment concludes that the Proposed Turbines will not significantly affect the integrity of the immediate landscape setting or the protected views towards Croghan Hill.
	ENVP-10 *It is Council policy to promote circular economy principles, prioritising prevention, reuse, recycling and recovery, and to sustainably manage residual waste. New developments will be expected to take account of the provisions of the Waste Management Plan for the Region and observe those elements of it that relate to waste prevention and minimisation, waste recycling facilities, and the capacity for source segregation.*	

Policy Theme	Policy/ Objective	Compliance
Material Assets - Waste	**ENVP-11** It is Council policy to ensure that all waste disposal shall be undertaken in compliance with the requirements of the Environmental Protection Agency and relevant Waste Management Legislation.	A Resource Waste Management Plan (RWMP) has been prepared and forms part of the CEMP in **Appendix 4-4** of the EIAR. The RWMP outlines the methods of waste prevention and minimisation by recycling, recovery and reuse at each stage of construction of the Proposed Project. Disposal of waste will be a last resort. The RWMP has been produced in line with the following guidance '*Best Practice Guidelines for the Preparation of Resource & Waste Management Plans for Construction & Demolition Projects*' (EPA, 2021). Please refer to **Appendix 4-4** of the EIAR for further details.
	ENVP-14 It is Council policy to require Construction and Environmental Management Plans (CEMPs) to be prepared for larger scale projects and this requirement shall be assessed on a case by case basis as part of the development management process. Where a CEMP is required, it shall be prepared in accordance with the criteria set out in Section 11.5.2 of this Plan.	
	BHP-37 It is Council policy that any development that may, due to its size, location or nature, have implications for archaeological heritage (including both sites and areas of archaeological potential / significance) shall be subject to an archaeological assessment. When dealing with proposals for development that would impact upon archaeological sites and/or features, there will be presumption in favour of the 'preservation in situ' of archaeological remains and settings, in accordance with Government policy. Where permission for such proposals is granted, the Planning Authority will require the developer to have the site works supervised by a licenced archaeologist.	A CEMP has been prepared for the Proposed Project and is included in **Appendix 4-4** of the EIAR. The CEMP includes details of drainage, peat and spoil management, and waste management, and clearly outlines the mitigation measures and monitoring proposals that are required to comply with the environmental commitments outlined in the EIAR. In the event that planning permission is granted for the Proposed Project, the CEMP will be updated prior to the commencement of the development, to address the requirements of any relevant planning conditions, including any additional mitigation measures which are conditioned, and will be submitted to the Planning Authority for approval. Please refer to **Appendix 4-4** of the EIAR for further details.

Policy Theme	Policy/ Objective	Compliance
Cultural Heritage	**BHP-38** It is Council policy to ensure that archaeological excavation is carried out according to best practice as outlined by the National Monuments Service, Department of Culture, Heritage and the Gaeltacht, the National Museum of Ireland and the Institute of Archaeologists of Ireland and to protect previously unknown archaeological sites and features, where they are discovered during development works.	**Chapter 14** of the EIAR presents the results of an archaeological, architectural and cultural heritage impact assessment of the construction, operation and decommissioning of the Proposed Project. The assessment concludes that no significant direct or indirect effects to the recorded cultural heritage resource as a result of the Proposed Project have been identified. Where potential direct effects to sub-surface archaeology have been identified, appropriate mitigation measures are proposed in order to ameliorate this potential effect. Please refer to **Chapter 14** of the EIAR for further details.
	BHO-05 It is an objective of the Council to protect archaeological sites and monuments, and archaeological objects, which are listed in the Record of Monuments and Places, and to seek their preservation in situ (or at a minimum, preservation by record) through the planning process	

Offaly County Development Plan 2021-2027 Wind Energy Strategy

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

The WES identifies key areas within the County that are designated as '*Areas Deemed Open for Consideration for Wind Energy Developments'* and '*Areas Not Deemed Suitable for Wind Energy Developments'*. Please refer to

Table 7-4 below for further details.

Table 7-4 Offaly County Development Plan 2021-2027 Wind Energy Strategy Designation Areas

Offaly County Council – Wind Energy Strategy Designation Areas	
Strategy Designation Areas	**Description**
Open for Consideration	**Areas Deemed Open for Consideration for Wind Energy Developments** These areas are open for consideration for wind energy development as these areas are characterised by low housing densities, do not conflict with European or National designated sites and have the ability by virtue of their landscape characteristics to absorb wind farm developments. Notwithstanding this designation, wind farm developments in these areas will be evaluated on a case by case basis subject to criteria listed in Development Management Standard 109 contained in Chapter 13 of Volume 1 of the County Development Plan and the Section 28 Wind Energy Development Guidelines.
Not Deemed Suitable	**Areas Not Deemed Suitable for Wind Energy Developments** a) This area is considered to be generally unsuitable for wind farm development due to significant environmental, heritage and landscape constraints and housing density. b) Individual small scale turbines will be considered on a case by case basis having regard to relevant exemption provisions in the Planning and Development Regulations 2001 as amended. c) Applications for re-powering (by replacing existing wind turbines) and extension of existing and permitted wind farms will be assessed on a case by case basis and will be subject to criteria listed in Development Management Standard 109 contained in Chapter 13 of Volume 1 of the County Development Plan and the Section 28 Wind Energy Development Guidelines.

As shown in

below the Proposed Turbines are located within an area designated ***'Open for Consideration'*** for Wind Energy Developments.

Furthermore, as detailed in **Table 7-3** above, it has been demonstrated that the Proposed Project aligns with the relevant policies and objectives of the OCDP and a statement of compliance with each of the Development Management Standards as set out in Chapter 13 of the OCDP has been provided in **Table 7-5 below**. Please refer to **Table 7-3** and **Table 7-5** for further details.

Development Management Requirements

Section 13.9.13 Energy and Communications of Chapter 13 of the OCDP sets out the Development Management Standards that the Planning Authority may consider when considering applications for wind energy developments such as the Proposed Project. The Proposed Project is assessed against each of the requirements as set out in **Table 7-5** below.

Table 7-5 Offaly County Development Plan 2021-2027 Wind Energy Development Management Standards

Local considerations taken into account by the Council	Compliance
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.	In relation to setback distances, all Proposed Turbines comply with the minimum 500 m setback in the WEDG 2006 the four times tip height setback in the Draft WEDG 2019. No inhabitable dwelling is located within 880 m of a Proposed Turbine. The closest inhabitable dwelling is approximately 894 m from the nearest Proposed Turbine, T16. In relation to noise and shadow flicker, **Chapter 5** of the EIAR states that detailed noise and shadow flicker modelling have been carried out as part of the EIAR, which shows that the Proposed Wind Farm will be capable of meeting all required guidelines in relation to noise thresholds and the shadow flicker thresholds set out in the WEDG 2006, and noise and shadow flicker can be controlled to meet the Draft WEDG 2019 standards if adopted. . In terms of location, spatial extent, spacing and layout, **Chapter 13** of the EIAR states that the siting and design of the Proposed Project adhere to the guidance for the siting of wind farms in Flat Peatland Landscapes as set out in the WEDG 2006 and the Draft WEDG 2019. Please refer to **Chapter 5**, **Chapter 12** and **Chapter 13** of the EIAR for further details.
› 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 and objective BLO-28 for wind development in these areas as	As shown in Error! Not a valid result for table. above the Proposed Turbines are located within an area designated as *'Areas Deemed Open for Consideration for Wind Energy Developments'*. 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 Proposed Project does not have any impact on the 'Peatland and Nature Corridors' as outlined in Objective BLO-28.

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.	The LVIA presented in **Chapter 13** of the EIAR assesses the likely significant effects of the Proposed Project on landscape and visual amenity. The LVIA was informed by desktop studies and receptor mapping, site visits, verified photomontages, and an impact assessment methodology which follows best practice guidance for LVIA. The LVIA also includes assessment of cumulative landscape and visual effects. Visibility is generally limited beyond 5km due to the flat, low-lying landscape and intervening vegetation. Significant visual effects are limited to a small number of elevated viewpoints and short sections of scenic routes. The large-scale, flat and expansive cutover peatland landscape is capable of accommodating the Proposed Project. Please refer to **Chapter 13** of the EIAR for further details.
› Impact on the residential amenities of the area.	**Chapter 5** of the EIAR assesses the potential effects of the Proposed Project on population and human health, including residential amenity. The principal potential effects are shadow flicker, noise and visual amenity. Detailed modelling concludes that no significant noise or shadow flicker effects will arise. While **Chapter 13** identifies significant residual visual effects at 2 no. residential viewpoints in close proximity to the Proposed Turbines (VP05 and VP15), **Chapter 18** of the EIAR confirms that no significant effect on population and human health will arise. Please refer to **Chapter 5**, **Chapter 12** and **Chapter 13** of the EIAR for further details.
› 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.	The scale and layout of the Proposed Project were developed through an iterative, constraints-led design process to minimize environmental effects while maintaining an efficient wind farm layout. The design was refined in response to environmental, technical and consultation findings, including the removal of a number of turbines. Turbines with a 200m tip height are located around the outer parts of the layout, with 220m turbines concentrated centrally to reduce visual effects. Cumulative landscape and visual effects have been assessed. Visibility is generally limited beyond 5 km, with significant visual effects limited to a small number of elevated viewpoints and short sections of scenic routes. Please refer to **Chapter 3**, **Chapter 4** and **Chapter 13** of the EIAR for further details.

› Visual and cumulative impact of the proposal with respect to protected views, scenic routes and designated scenic landscapes and 'Peatland and Nature Corridors' as detailed in Chapter 4 of this Plan.	**Chapter 13** of the EIAR assesses the potential effects of the Proposed Project on protected views, scenic routes and designated scenic landscapes. The assessment was informed by ZTV mapping, route screening, field verification and photomontages. Where visibility occurs, significant visual effects are limited to a small number of elevated viewpoints and short sections of scenic routes. **Chapter 13** includes a cumulative impact assessment where all existing, permitted and proposed wind farms in the cumulative study area are considered. Please refer to **Chapter 13** of the EIAR and EIAR Volume 2: Photomontage Booklet for further details.
› Impact on the 'Peatland and Nature Corridors' (Objective BLO-28) in terms of tranquillity, landscape, options for amenity and tourism development, biodiversity protection and enhancement, and carbon sequestration.	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 Proposed Project does not have any impact on the 'Peatland and Nature Corridors' as outlined in Objective BLO-28. Please refer to **Chapter 4**, **Chapter 6 and Chapter 13** for further details.
› Impact on nature conservation, ecology, soil, hydrology, groundwater, archaeology, built heritage and public rights of way.	**Chapter 6** of the EIAR assesses the likely significant effects of the Proposed Project on biodiversity. Following mitigation, no significant residual effects are identified for any Key Ecological Receptor or for receptors of international, national or local importance. **Chapter 7** similarly concludes that no significant residual effects will arise for any Key Ornithological Receptor. **Chapter 8** assesses land, soils and geology. The Proposed Project infrastructure footprint is approximately 2.9% of the overall Project Site area and, with the proposed mitigation and the measures in the Peat and Spoil Management Plan (**Appendix 4-3**), no significant effects on land, peat, soils or bedrock geology are identified. **Chapter 9** concludes that no significant effects on surface water, groundwater or hydrologically connected designated sites will arise following mitigation. **Chapter 14** concludes that no significant direct or indirect effects on recorded archaeological, architectural or cultural heritage assets will arise, with mitigation proposed where potential effects on subsurface archaeology are identified.

	Public access and amenity have also been considered in the design, which includes amenity tracks, boardwalk and car parks. Please refer to the NIS and **Chapter 4**, **Chapter 6**, **Chapter 7**, **Chapter 8**, **Chapter 9** and **Chapter 14** of the EIAR for further details.
› Impact on ground conditions and geology.	**Chapter 8** of the EIAR assesses the likely significant effects of the Proposed Project on land, soils and geology. The Proposed Project infrastructure footprint is approximately 2.9% of the overall Project Site area. With the implementation of the mitigation measures set out in **Chapter 8** and the best practice measures in the Peat and Spoil Management Plan, no significant effects on land, peat, soils or the underlying limestone bedrock geology are identified during the construction, operational or decommissioning phases. Please refer to **Chapter 8** and **Appendix 4-3** of the EIAR for further details.
› Consideration of falling distance plus an additional flashover distance from wind turbines to overhead transmission lines.	The layout of the Proposed Project has been designed to minimise the potential environmental effects, while at the same time maximising the energy yield from the wind resource passing over the Project Site. Constraint studies, as described in **Chapter 3** of the EIAR, have been carried out to ensure that turbines and all ancillary infrastructure are located in the most appropriate areas of the Project Site. The Proposed Turbine layout has been optimised using wind farm design software (a combination of WAsP [wind resource assessment software]) and WindPro [Computational Fluid Dynamics and WindFarmer]) to maximise the energy yield from the Project Site, while maintaining sufficient distances between the proposed turbines to ensure turbulence and wake effects do not compromise turbine performance and maintain the minimum setbacks from neighbouring properties as set out in the WEDG 2006 and Draft WEDG 2019. The final design of the Proposed Wind Farm takes account of all site constraints and the distances to be maintained between turbines and from houses, roads, etc. The layout is based on the results of all site investigations that have been carried out during the EIAR process and the EIA scoping process with statutory and non-statutory consultees. As information regarding the Proposed Project was compiled and assessed, the number of turbines and the proposed layout have been revised and amended to take account of the physical constraints of the Project Site and the requirement for buffer zones and other areas which should be avoided. Please refer to **Chapter 3** and **Chapter 4** of the EIAR for further details.

› Impact of development on the road network in the area.	**Chapter 15** of the EIAR assesses the likely significant effects of the Proposed Project on traffic and transport. During the 36-month construction phase, the additional traffic on the public road network is forecast to have a short-term, slight, negative effect on existing road users. No significant effects are identified following the implementation of the proposed mitigation measures. During the operational phase, the traffic effect will be imperceptible, long-term and negative following mitigation, which is Not Significant. Please refer to **Chapter 15** of the EIAR for further details.
› Impact of the development on radio observatories and broadcast communications in the area.	**Chapter 15** of the EIAR assesses the likely significant effects of the Proposed Project on radio, broadcast and telecommunications services. Ai Bridges prepared the Telecommunications Impact Assessment included as **Appendix 15-8**. Without mitigation, potential impacts were identified on 3 no. Virgin Media telecommunications links, which will be mitigated by the proposed relay mast. The Applicant will engage with Virgin Media and ESB Networks prior to the commencement of construction, and a standard protocol will be agreed with 2RN. No significant residual effects on telecommunications are anticipated. Please refer to **Chapter 15** of the EIAR for further details.
› 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.	**Chapter 5** of the EIAR assesses the potential effects of the Proposed Project on population and human health. The World Health Organization's 2018 Environmental Noise Guidelines for the European Region were considered in **Chapter 12** of the EIAR, which sets out why the 45 dB Lden guideline value is not an appropriate criterion for wind turbine noise in Ireland; the noise assessment criteria are based on the WEDG 2006. Detailed noise and shadow flicker modelling demonstrates that the Proposed Wind Farm will be capable of meeting the applicable limits. The air quality assessment concludes that operational dust and other emissions to air will have long-term, imperceptible, negative effects which is Not Significant. Please refer to **Chapter 5**, **Chapter 10** and **Chapter 12** of the EIAR for further details.

7.2.2 Kildare County Development Plan 2023-2029

The Kildare County Development Plan 2023-2029 (KCDP) was adopted by the elected members of 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 Proposed Project as a renewable energy development will support Co. Kildare in achieving its strategic vision and objectives to create a sustainable, low-carbon, climate-resilient and environmentally sustainable economy and society by generating and providing c. 322MW of renewable wind energy. The Proposed Project will reduce the county's reliance on non-renewable resources for energy generation such as fossil fuels by providing a renewable wind energy generator, subsequently reducing greenhouse gas emissions.

The KCDP includes policies in relation to climate action and reducing greenhouse gas emissions which aligns the County with wider European, national and regional objectives. The KCDP also includes policies regarding renewable energy and electricity grid infrastructure. **Table 7-6** below sets out the policies and objectives within the KCDP relevant to the Proposed Project. A statement of compliance is included with regard to each relevant policy outlined. It is demonstrated through **Table 7-6** that the Proposed Project is in compliance with the relevant policies and objectives of the KCDP.

Table 7-6 Co. Kildare Local Policy Objective and Compliance Summary Table

Policy Theme	Policy/ Objective	Compliance
Climate Action	**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.	The Proposed Project directly contributes to the onshore wind energy target of 9GW as set out in CAP25 by generating c. 322 MW of clean, renewable electricity, which will be integrated into the grid, reducing the reliance on imported fossil fuels and as such reducing emissions of greenhouse gases. This will also aid in achieving the climate change and renewable energy objectives to reach national targets and transition to a low-carbon economy.
	EC O1 Ensure that energy intensive sectors incorporate significant renewable energy sources to reduce their carbon footprint.	
Renewable Energy	**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.	The Proposed Project supports the generation of clean, renewable energy which will be integrated into the national grid, helping to electrify and decarbonise other sectors, therefore, reducing the reliance on imported fossil fuels and improving the sustainability and security of Ireland's national and regional energy system. The EIAR, NIS and this Planning Report demonstrate that the Proposed Project is in line with the proper planning and sustainable development of the area in which the Project Site is located. The Proposed Project will support the achievement of national targets in relation to reductions in fossil fuel dependency and greenhouse gas emissions.
	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	The Proposed Project aligns with the aims of KCC in relation to the protection and conservation of biodiversity and ecological connectivity. **Chapter 6** and **Chapter 7** of the EIAR conclude that provided that the Proposed Project is constructed and operated in accordance with the design, best practice and mitigation measures

Policy Theme	Policy/ Objective	Compliance
	developments will have regard for protected species and provide mitigation and monitoring where applicable.	that are described within this application, significant individual or cumulative effects on ecology and ornithology are not anticipated. A comprehensive AA Screening and NIS have been submitted with this application which includes an assessment of all potential direct or indirect adverse effects on European Sites. The NIS objectively concluded that the Proposed Project, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site. **Chapter 9** of the EIAR provides a baseline assessment of the environmental setting of the Project Site in terms of hydrology and hydrogeology and discusses the potential likely significant effects that the construction, operation and decommissioning of the Proposed Project will have. **Chapter 9** concludes that, with appropriate mitigation measures in place, no significant effects on the hydrological and hydrogeological environment are envisaged.
	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.	The Proposed Project includes a Community Benefit Fund based on the Applicant's established community benefit model. The Fund will support local communities, near neighbours, local students and community-led projects. Please refer to **Section 4.10** of **Chapter 4** and the Community Engagement Report included as **Appendix 2-2** of the EIAR for further details.
	EC O9 Ensure that whenever possible and appropriate, community benefits are derived from all renewable energy developments in the county.	
Wind Energy Developments	**EC P4** Have regard to the Department of the Environment, Heritage and Local Government's 'Guidelines for Planning Authorities on Wind Energy	**Table 7-8** of this Report provides a compliance statement against the KCDP Wind Energy Strategy and the relevant development

Policy Theme	Policy/ Objective	Compliance
	Development' (or any subsequent updates) and the Kildare County Council Wind Energy Strategy when assessing planning applications for wind farms.	management standards in Chapter 15 of the KCDP, including the WEDG 2006 and Draft WEDG. Please refer to **Table 7-8** of this Planning Report for further details.
	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.	The entirety of the Proposed Project is located in an area 'Open to Consideration' for wind energy development. The Proposed Project aligns with the aims of KCC in relation to the protection and conservation of biodiversity and ecological connectivity. **Chapter 6** of the EIAR concludes that provided that the Proposed Project is constructed and operated in accordance with the design, best practice and mitigation measures that are described within this application, significant individual or cumulative effects on ecology are not anticipated. Similarly, **Chapter 7** of the EIAR concludes that provided that the Proposed Project is constructed, operated and decommissioned in accordance with the design, best practice mitigation and offsetting measures that are described within this application, significant individual or cumulative effects on the identified KORs are not anticipated. A comprehensive AA Screening and NIS have been submitted with this application which includes an assessment of all potential direct or indirect adverse effects on European Sites. The NIS objectively concluded that the Proposed Project, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site.
	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.	A Community Benefit Fund will be established for the Proposed Project. The Fund will provide support for local communities, near neighbours, local students, recreation amenities and community-led projects.

Policy Theme	Policy/ Objective	Compliance
		Please refer to **Section 4.10** of **Chapter 4** and **Appendix 2-2** of the EIAR for further details.
	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.	The EIAR addresses the matters contained in Section 6 of the County Wind Energy Strategy. A Decommissioning Plan is provided in **Appendix 4-7** of the EIAR. On decommissioning, turbine components will be removed for recycling or recovery, and waste will be managed in accordance with the waste hierarchy. The CEMP and RWMP are contained in **Appendix 4-4** of the EIAR. Please refer to **Chapter 4**, **Appendix 4-4** and **Appendix 4-7** of the EIAR for further details.
	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 Proposed Project directly contributes to the onshore wind energy target of 9GW as set out in CAP25 by generating c. 322 MW of clean, renewable electricity, which will be integrated into the grid, reducing the reliance on imported fossil fuels and as such reducing emissions of greenhouse gases. This will also aid in achieving the climate change and renewable energy objectives to reach national targets and transition to a low-carbon economy.
Grid Infrastructure	**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.	The provision of new renewable energy transmission infrastructure such as the Proposed Grid Connection is in line with **EC P19**. The Proposed Grid Connection will facilitate the transmission of renewable electricity from the Proposed Wind Farm to the national electricity grid.

Policy Theme	Policy/ Objective	Compliance
	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.	The Proposed Project which includes the Proposed Grid Connection aligns with **EC O66** by facilitating the Proposed Wind Farm's connection to the national electricity grid.
	EC O67 Require that developments involving the siting of overhead cables shall minimise visual impact by avoiding areas of high landscape sensitivity, sites and areas important for biodiversity and/or archaeological, cultural or heritage interest.	The Proposed Project is in compliance with **EC O67**, as the Proposed Grid Connection will be predominantly underground. The only overhead element comprises a loop-in connection to the existing Maynooth–Dunstown 220 kV overhead line, thereby limiting the extent of new overhead infrastructure and minimising associated visual effects. Please refer to **Section 4.4.2 of Chapter 4** of the EIAR for further details.
	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 Proposed Project is in compliance with Objective **EC O70** by facilitating the transmission of renewable energy from the Proposed Wind Farm, located across the border of County Offaly and County Kildare, through County Kildare to the national grid, thereby supporting grid reinforcement and transboundary energy infrastructure between adjacent counties. The Proposed Project has been subject to comprehensive AA and ecological assessment, with regard given to protected species and appropriate mitigation and monitoring measures incorporated where required.
Peatlands	**EC P17** Support the preparation of a comprehensive "after use" framework plan for the industrial peatlands and associated workshops, office buildings, industrial	The Proposed Project represents an appropriate and sustainable after-use of former industrial peatlands, harnessing the area's wind

Policy Theme	Policy/ Objective	Compliance
	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.	resource to generate c. 322 MW of renewable energy to the national grid. The Proposed Project will contribute to the transition of the site from its historic use for peat extraction, towards a low-carbon, climate-resilient energy system. The proposed wind farm site would continue to be managed as per the requirements of the IPC licence as detailed in Chapter 4 section 4.6.7. The measures outlined in the Draft Rehabilitation Plan (Appendix 2-4 of the EIAR) will be implemented by BnM in agreement with the EPA, per the BnM's IPC Licence Obligations (P0503-01). This requirement applies independently of the Proposed Project's planning status. The Proposed Enhancement and Offset Areas have been designed with due regard for rehabilitation activities on the Proposed Wind Farm site. The EIAR, AA Screening Report and NIS submitted with the application comprehensively assess the potential ecological and hydrological effects of the Proposed Project, peat stability and the overall carbon balance of the development.
	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.	
	BI O54 Work with relevant agencies such as EMRA, BnM, the NPWS, Coillte and adjacent councils to prepare a comprehensive after use framework plan for large cutaway bog sites and associated workshops, office buildings and industrial sites which provide for future sustainable environmental needs and are a significant resource for amenities when peat harvesting ends.	

Policy Theme	Policy/ Objective	Compliance
Green Infrastructure	**BI P14** Protect and enhance the Green Infrastructure network throughout the county.	The Proposed Project protects and enhances green infrastructure through peatland enhancement, native woodland planting, marsh fritillary habitat management and pollinator-friendly corridors, as set out in the BMP in **Appendix 6-5**. These measures will strengthen ecological connectivity across the Project Site. Please refer to **Chapter 6** of the EIAR for further details.
	BI O74 Strengthen ecological networks between urban areas to create greater linkages to Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional Green Infrastructure network.	
	BI A31 Work with Bord Na Mona and other stakeholders to prepare a Green Infrastructure Masterplan that will inform the delineation of core areas, stepping stones and corridors (long distance peatways) as identified in Sections 12.14.6, 12.14.7 and 12.14.8, that may inform the designation of an interconnected Bog of Allen Nature Reserve, Special Amenity Area Order and/or National Peatlands Park.	
Biodiversity	**EC O16** Require comprehensive winter and summer bird and wildlife surveys for all proposed wind farms sites in accordance with EIA, EU Habitats and Species Directives and all other relevant environmental legislation, so that impacts on wildlife can be fully assessed and evaluated and so that appropriate mitigation and adaptation measures can be considered. Turbine design and adaptation should use the best available technology to minimise harm to birds and other wildlife.	Comprehensive winter, breeding season and species-specific bird surveys were undertaken to inform the ornithological assessment. **Chapter 7** of the EIAR concludes that, following the proposed mitigation, offsetting and monitoring measures, significant residual effects on the identified Key Ornithological Receptors are not anticipated. A Bird Monitoring Plan is included in **Appendix 7-7** of the EIAR.
	EC O73 Consider the removal of trees (singular or in stands) and hedgerows (in part or in whole) only in circumstances where it can be clearly demonstrated that the removal of hedgerow material and or tree(s) is essential for the provision of energy and cannot be designed out. Where proven, the vegetation is to be replaced with equivalent number, species, variety and size as was in situ. Where non-native species are removed, they will be required to be replaced with native species. In all cases, plants of local provenance are to be planted within 1 year of removal and maintained to establishment to negate the habitat	Tree felling and vegetation removal have been limited to the areas required for the Proposed Project, with woodland and scrub outside the construction footprint protected from works. The BMP in **Appendix 6-5** also provides for the creation of approximately 45.3 hectares of native woodland habitat.

Policy Theme	Policy/ Objective	Compliance
	and biodiversity loss within 3 years. Existing vegetative or 'stepping-stone' linkages are to be maintained and improved upon to increase wildlife corridors. Opportunities should be sought to translocate existing species rich hedgerows, where possible, and subject to proper biosecurity protocols.	
	BI P1 Integrate in the development management process the protection and enhancement of biodiversity and landscape features by applying the mitigation hierarchy to potential adverse impacts on important ecological features (whether designated or not), i.e. avoiding impacts where possible, minimising adverse impacts, and if significant effects are unavoidable by including mitigation and/or compensation measures, as appropriate. Opportunities for biodiversity net gain are encouraged.	**Chapter 6** of the EIAR presents a comprehensive assessment of habitats, flora and fauna within the Project Site and applies the mitigation hierarchy through project design, best practice measures and the BMP in **Appendix 6-5**. With regard to birds, the mitigation hierarchy has been applied throughout the design and assessment of the Proposed Project, as set out in **Chapter 7** of the EIAR. Where significant effects on KORs could not be avoided through project design and layout, these are addressed through mitigation, offsetting and ongoing monitoring measures. With these measures in place, no significant residual effects on birds are predicted. The assessment concludes that, with these measures in place, significant individual or cumulative effects on ecology are not anticipated.
	BI O1 Require, as part of the Development Management Process, the preparation of Ecological Impact Assessments that adequately assess the biodiversity resource within proposed development sites, to avoid habitat loss and fragmentation and to integrate this biodiversity resource into the design and layout of new development and to increase biodiversity within the proposed development. Such assessments shall be carried out in line with the CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine.	An Ecological Impact Assessment has been prepared by suitably qualified ecologists and is presented in **Chapter 6** of the EIAR. The assessment was undertaken in accordance with relevant CIEEM guidance and informed the design, avoidance, mitigation and enhancement measures for the Proposed Project. Significant individual or cumulative effects on ecology are not anticipated following implementation of these measures.

Policy Theme	Policy/ Objective	Compliance
	BI O3 Actively support the implementation of national biodiversity initiatives such as the All-Ireland Pollinator Plan 2021-2026	The BMP in **Appendix 6-5** provides for the management and enhancement of suitable marsh fritillary habitat, the creation of pollinator-friendly corridors and native woodland planting. These measures will improve habitat connectivity and provide additional habitat for pollinating species within the Project Site. Please refer to **Chapter 6** of the EIAR for further details.
	BI O5 Move towards no net loss of biodiversity through strategies, plan, mitigation measures, appropriate offsetting and/or investment in Blue-Green infrastructure	**Chapter 6** of the EIAR presents a comprehensive assessment of habitats, flora and fauna within the Project Site and applies the mitigation hierarchy through project design, best practice measures and the BMP in **Appendix 6-5**. The assessment concludes that, with these measures in place, significant individual or cumulative effects on ecology are not anticipated. **Chapter 7** of the EIAR presents a comprehensive assessment of the potential effects of the Proposed Project on birds. Habitat loss arising from the Proposed Project will be offset through the creation and enhancement of suitable habitat within the Proposed Enhancement Areas, which will be managed and monitored for the lifetime of the Proposed Project. With these measures in place, no significant residual effects on birds, including species protected under the Birds Directive, are predicted. The potential effects of the Proposed Project on European Sites have been assessed in the AA Screening Report and NIS submitted with the application. The NIS concludes that the Proposed Project, individually or in combination with other plans or projects, will not
	BI O6 Apply the precautionary principle in relation to proposed developments in environmentally sensitive areas to ensure that all potential adverse impacts on a designated NHA or Natura 2000 Site arising from any proposed development or land use activity are avoided, remedied, or mitigated.	
	BI O7 Pursue insofar as possible and practical, a policy of biodiversity net gain through strategies, plans, developments, mitigation measures, appropriate offsetting and/or investment in Blue-Green infrastructure.	
	BI P2 Seek to contribute to maintaining or restoring the conservation status of all sites designated for nature conservation or proposed for designation in accordance with European and national legislation and agreements. These include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Natural Heritage Areas (NHAs), Ramsar Sites and Statutory Nature Reserves.	
	BI O8 Support the implementation of the National Raised Bog Special Areas of Conservation Management Plan 2017-2022.	

Policy Theme	Policy/ Objective	Compliance
	BI O9 Avoid development that would adversely affect the integrity of any Natura 2000 site and promote favourable conservation status of habitats and protected species including those listed under the Birds Directive, the Wildlife Acts and the Habitats Directive, to support the conservation and enhancement of Natura 2000 Sites including any additional sites that may be proposed for designation during the period of this Plan and protect the Natura 2000 network from any plans and projects that are likely to have a significant effect on the coherence or integrity of a Natura 2000 Site.	adversely affect the integrity of any European Site. Please refer to **Chapter 6** of the EIAR and the NIS for further details.
	BI O10 Ensure an Appropriate Assessment Screening, in accordance with Article 6(3) and Article 6(4) of the Habitats Directive, Section 177A of the Planning and Development Act (2001-2022) or any superseding legislation and with DEHLG guidance (2009), is carried out in respect of any plan or project not directly connected with or necessary to the management of a Natura 2000 site to determine the likelihood of the plan or project having a significant effect on a Natura 2000 site, either individually or in combination with other plans or projects and to ensure that projects which may give rise to significant cumulative, direct, indirect or secondary impacts on Natura 2000 sites will not be permitted (either individually or in combination with other plans or projects) unless for reasons of overriding public interest.	
	BI O11 Support the establishment of conservation measures and the preparation and implementation of management plans for the conservation of Natura 2000 sites by NPWS, as required by Article 6(1) of the Habitats Directive.	
	BI O12 Require the preparation of an Ecological Impact Assessment (EcIA) by a suitably qualified professional for proposals for development within or adjacent to a Natural Heritage Area (NHA)/proposed Natural Heritage Areas (pNHA), to ensure the development is designed and sited to minimise its impact on the biodiversity, ecological, geological and landscape value of the site,	**Chapter 6** of the EIAR presents an Ecological Impact Assessment of the potential effects of the Proposed Project on NHAs, pNHAs and other ecologically sensitive sites. The project design and proposed mitigation measures avoid or minimise effects on the ecological,

Policy Theme	Policy/ Objective	Compliance
	particularly plant and animal species listed under the Wildlife Acts. Such assessments shall be carried out in line with the CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine.	geological and landscape value of these sites. Significant residual effects are not anticipated.
	BI O14 Conserve, preserve and protect the integrity of and maintain the favourable conservation value/status within or adjacent to Ramsar Sites, Statutory Nature Reserves, Biogenetic Reserves, Wildfowl Sanctuaries, all existing and proposed NHAs. They should be designed and sited so as to minimise their impact on the ecological and landscape values of these sites under National and European legislation and International Agreements.	
	BI P4 Ensure that any new development proposal does not have a significant adverse impact, incapable of satisfactory mitigation on plant, animal or bird species which are protected by law.	**Chapter 6** and **Chapter 7** of the EIAR assess the potential effects of the Proposed Project on protected habitats and species. Avoidance, mitigation, enhancement and monitoring measures are incorporated into the project design. With these measures in place, significant residual effects on ecological or ornithological receptors are not anticipated.
	BI O15 Ensure that any new development proposal does not have a significant adverse impact on rare and threatened species, including those protected under the Wildlife Acts 1976 and 2012, the Birds Directive 1979 the Habitats Directive 1992 and the Flora Protection Order species and any species listed under the national red lists or that could be listed on a national red list.	
	BI O16 Ensure appropriate species and habitat avoidance and mitigation measures are incorporated into all new development proposals.	
	BI O17 Require a derogation licence, where necessary, issued by the DHLGH, in the event of a proposed development impacting on a site known to be a breeding or resting site of species listed in the Habitats Directive (Annex IV species).	**Chapter 6** of the EIAR identifies protected species and their breeding or resting sites within the zone of influence of the Proposed Project. The project design incorporates avoidance and mitigation measures, and any derogation licence required from the Department of Housing, Local Government and Heritage will be obtained prior to the relevant works.

Policy Theme	Policy/ Objective	Compliance
	BI O18 Require all applications for new developments to identify, protect and sensitively enhance the most important ecological features and habitats, and incorporate these into the overall open space network, keeping free from development and to provide links to the wider Green Infrastructure network as an essential part of the design process and by making 394 provision for local biodiversity (e.g. through provision of swift boxes or towers, bat roost sites, hedgehog highways2, green roofs, etc.).	The Proposed Project has been designed to avoid and protect important ecological features where practicable. The BMP in **Appendix 6-5** provides for peatland enhancement, native woodland planting, marsh fritillary habitat management and pollinator-friendly corridors, strengthening ecological connectivity across the Project Site.
	BI O20 Conserve and protect habitats and species listed in the Annexes of the EU Habitats Directive (92143/EEC) (as amended), the Birds Directive (20091147/EC), Directive Annex 2, the Wildlife Acts 1976 to 2000, The Wildlife Acts 1976 (as amended) and the Flora Protection Order No 94 of 1999.	**Chapter 6** and **Chapter 7** of the EIAR assess the potential effects of the Proposed Project on protected habitats and species. Avoidance, mitigation, enhancement and monitoring measures are incorporated into the project design. With these measures in place, significant residual effects on ecological or ornithological receptors are not anticipated.
	BI O21 Work with bodies such as the NPWS and National Biodiversity Data Centre to ensure that species for which Kildare is a national stronghold such as Green-Flowered Helleborine Orchid, Yellowhammer and Linnet, which are nationally rare or declining, are supported to flourish and seek to ensure the habitat conditions favourable to such species are retained in the county.	The ecological and ornithological surveys considered rare, threatened and declining species recorded within the zone of influence of the Proposed Project. Avoidance, mitigation and monitoring measures are set out in **Chapter 6** and **Chapter 7** of the EIAR. The Applicant also proposes to submit ornithological monitoring survey data to organisations such as the National Biodiversity Data Centre.
	BI O22 Identify and protect areas of high nature conservation value (including but not limited to SAC/SPA/pNHA) and support the landscape features which act as ecological corridors/networks and stepping-stones, such as river corridors, hedgerows, and road verges so as to minimise the loss of habitats and features of the wider countryside which are of major importance for wild fauna and flora in accordance with Article 10 of the Habitats Directive.	The Proposed Project has been designed to minimise the loss and fragmentation of ecological corridors and stepping-stone habitats. Watercourses and associated riparian habitats will be protected, and the BMP in **Appendix 6-5** provides for native woodland, pollinator-friendly corridors and peatland enhancement. **Chapter 7** of the EIAR presents a comprehensive assessment of the potential effects of the Proposed Project on birds, including those

Policy Theme	Policy/ Objective	Compliance
		using the peatland habitats and ecological corridors within and surrounding the Project Site. These habitats will be protected and enhanced through the Proposed Enhancement Areas, while construction-phase measures will minimise disturbance to breeding and roosting birds. With these measures in place, no significant residual effects on birds are predicted. Please refer to **Chapter 6** and **Chapter 7** of the EIAR for further details.
	BI P5 Identify and conserve locally important biodiversity sites in the county which contribute to the overall ecological network of County Kildare.	**Chapter 6** of the EIAR presents a comprehensive assessment of habitats, flora and fauna within the Project Site and applies the mitigation hierarchy through project design, best practice measures and the BMP in **Appendix 6-5**. The assessment concludes that, with these measures in place, significant individual or cumulative effects on ecology are not anticipated.
	BI O24 Identify biodiversity corridors, watercourses, significant as well as native and indigenous hedgerows, or marginal habitat, between County Biodiversity Sites in order to appropriately landscape same in order to ensure population recovery and survival, abundance, productivity, genetic diversity and species richness.	Watercourses, treelines, woodland, scrub and other habitats that contribute to ecological connectivity were identified through the ecological surveys and considered in the project design. The BMP in **Appendix 6-5** provides for habitat enhancement and improved connectivity through native woodland planting and pollinator-friendly corridors.
	BI P7 Recognise and promote inland waters, natural environmental assets and to protect rivers, streams and other watercourses and, wherever possible, maintain them in an open state capable of providing suitable habitats for fauna and flora while discouraging culverting or realignment.	The routes of natural watercourses will not be altered as part of the Proposed Project. The existing Figile River crossings will be replaced with clear-span bridges, and other new watercourse crossings will use clear-span structures or bottomless/oversized embedded culverts, and the Proposed Grid Connection will cross beneath the Grand Canal by horizontal directional drilling, avoiding in-stream works. Crossing works will follow relevant OPW and Inland Fisheries Ireland
	BI O37 Ensure the protection of rivers, streams and other watercourses and, wherever possible, maintain them in an open state capable of providing suitable	

Policy Theme	Policy/ Objective	Compliance
	habitats for fauna and flora while discouraging culverting or realignment. Endeavour to re-open previously culverted streams and watercourses through any future development/redevelopment proposals.	guidance. Please refer to **Chapter 4**, **Chapter 6** and **Chapter 9** of the EIAR for further details.
	BI O38 Require the preparation and submission of an Ecological Impact Assessment (EcIA) including, but not limited to, bat and otter surveys for developments along river or canal corridors.	**Chapter 6** of the EIAR includes an Ecological Impact Assessment informed by dedicated bat and otter surveys. The assessment considers the Proposed Project's interaction with river and canal corridors and includes avoidance, mitigation and monitoring measures for these species. Significant residual effects are not anticipated.
	BI O39 Consult with Inland Fisheries Ireland (IFI) and Waterways Ireland in relation to any development (greenfield development or redevelopment of brownfield sites) that could potentially impact on the aquatic ecosystems and associated riparian habitats while taking account of 'Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites' (IFI, 2004) and 'Planning for Watercourses in the Urban Environment' (IFI, 2020).	Consultation with Inland Fisheries Ireland was undertaken in relation to the Proposed Project. Watercourse crossing works will follow relevant OPW and Inland Fisheries Ireland guidance, and the Grand Canal crossing will be completed by horizontal directional drilling with no in-stream works. If the Proposed Project gets granted, consultation will occur with IFI before commencement of the construction phase. Please refer to **Chapter 4**, **Chapter 6** and **Chapter 9** of the EIAR for further details.
	BI O40 Support Inland Fisheries Ireland's pilot projects to investigate the incorporation of habitat restoration measures on waters draining the Bog of Allen into flood management schemes.	The Proposed Project is not a flood management pilot project. The drainage design and biodiversity enhancement measures have nevertheless been coordinated to protect aquatic habitats and support the rehabilitation and enhancement of the Allen Bog Group peatland landscape.
	BI O41 Maintain riparian buffer zones and potential uses as identified in Table 12.4 when considering potential development and proposed development layouts within or adjacent to waterways.	The layout of the Proposed Project was informed by 50m buffer zones around natural watercourses. Where works are necessary inside the 50m buffer zones, including at watercourse crossings, additional mitigation such as double silt fencing will be implemented. There will be no direct discharge to natural watercourses, and runoff from

Policy Theme	Policy/ Objective	Compliance
		works areas will be attenuated and treated before being dispersed over vegetated areas. **Chapter 9** of the EIAR concludes that, with the proposed mitigation measures in place, no significant effects on the hydrological and hydrogeological environment are anticipated.
	BI O42 Ensure that any proposals for a National Peatlands Park will consider the important rivers and populations of native fish and other species, when draining the Bog of Allen area.	The Proposed Project does not comprise a National Peatlands Park. **Chapter 6, Chapter 7** and **Chapter 9** of the EIAR assess the potential effects of the Proposed Project on rivers, aquatic habitats and fish populations within and downstream of the Project Site. With the proposed mitigation measures in place, significant effects are not anticipated.
	BI O43 Consult with Inland Fisheries Ireland (IFI) and Waterways Ireland in relation to any structures designed for crossing fisheries waters. In this regard consideration must be given to the following biological criteria: › species of fish required to safely pass › size of fish required to pass (life stage) › time of year in which fish passage is required • high and low design passage flows etc	The routes of natural watercourses will not be altered as part of the Proposed Project. The existing Figile River crossings will be replaced with clear-span bridges, and other new watercourse crossings will use clear-span structures or bottomless/oversized embedded culverts, and the Proposed Grid Connection will cross beneath the Grand Canal by horizontal directional drilling, avoiding in-stream works. If the Proposed Project gets granted, consultant will occur with IFI before commencement of the construction phase. Crossing works will follow relevant OPW and Inland Fisheries Ireland guidance. Please refer to **Chapter 4**, **Chapter 6** and **Chapter 9** of the EIAR for further details.
	BI O44 Require that expert advice is sought from a suitably qualified bat expert, in developing lighting proposals along river and stream corridors or other important locations or corridors for wildlife, to mitigate impacts of lighting on bats and other species. The use of artificial lighting shall be avoided in streamside zones (see Figure 12.2) and artificial lighting should be restricted	Lighting within and adjacent to watercourse corridors will be limited to that required for safety and security and will be directed to minimise light spill. The ecological assessment includes consideration of lighting effects on bats and other fauna, and appropriate restrictions form part of the mitigation measures.

Policy Theme	Policy/ Objective	Compliance
	unless absolutely necessary in the middle zone (See Table 12.4). LEDs should, where permitted, be warm white to minimise disturbance to wildlife.	Please refer to **Chapter 6** of the EIAR for further details.
	BI O45 Ensure that any runoff from developed areas does not result in any deterioration of downstream watercourses or habitats and require that pollution generated by a development is treated within the development area prior to discharge to local watercourses.	The layout of the Proposed Project was informed by 50m buffer zones around natural watercourses. Where works are necessary inside the 50m buffer zones, including at watercourse crossings, additional mitigation such as double silt fencing will be implemented. There will be no direct discharge to natural watercourses, and runoff from works areas will be attenuated and treated before being dispersed over vegetated areas. **Chapter 9** of the EIAR concludes that, with the proposed mitigation measures in place, no significant effects on the hydrological and hydrogeological environment are anticipated.
	BI O46 Generally, prohibit infilling of land adjacent to rivers, including natural floodplains, prior to or during any development. This will only be permitted, where, in the opinion of the planning authority, there is an overriding public interest in order to provide a key public infrastructure or to provide a more coherent design approach (in line with an approved urban design strategy) but, it will be subject to ensuring that adequate compensatory flood storage (if necessary) is provided elsewhere.	No infilling or realignment of natural watercourses or riverine floodplains is proposed. Existing natural watercourse routes will be retained, with runoff controlled, attenuated and treated through the proposed drainage system. Please refer to **Chapter 4** and **Chapter 9** of the EIAR for further details.
	BI O47 Ensure the protection, improvement or restoration of riverine floodplains and to promote strategic measures to accommodate flooding at appropriate locations including nature-based solutions, in order to protect ground and surface water quality and build resilience to climate change.	The drainage design retains the natural function of watercourses and their riparian areas and incorporates measures to control runoff and protect water quality. The BMP also provides for peatland rewetting and enhancement. Please refer to **Chapter 6** and **Chapter 9** of the EIAR for further details.
	BI P8 Ensure that Kildare's wetlands and watercourses are retained for their biodiversity, climate change mitigation properties and flood protection values	The layout of the Proposed Project was informed by 50m buffer zones around natural watercourses. Where works are necessary inside

Policy Theme	Policy/ Objective	Compliance
	and at a minimum to achieve and maintain at least good ecological status for all wetlands and watercourses in the county by, at the latest, 2027 in line with the Water Framework Directive and Ramsar Convention.	the 50m buffer zones, including at watercourse crossings, additional mitigation such as double silt fencing will be implemented. There will be no direct discharge to natural watercourses, and runoff from works areas will be attenuated and treated before being dispersed over vegetated areas. **Chapter 9** of the EIAR concludes that, with the proposed mitigation measures in place, no significant effects on the hydrological and hydrogeological environment are anticipated.
	BI P9 Implement and support measures for the prevention and/or eradication of invasive species within the county and the control of noxious weeds.	Invasive species were recorded and assessed as part of the ecological surveys. Japanese knotweed is located more than 350 metres from the nearest Proposed Project infrastructure and will not be disturbed, while the Grand Canal crossing will be completed by horizontal directional drilling with no in-stream works. Biosecurity measures will be implemented to prevent the spread of invasive species. Please refer to **Chapter 6** of the EIAR for further details.
	BI O58 Require all development proposals to address the presence or absence of invasive alien species on proposed development sites and (if necessary) require applicants to prepare and submit an Invasive Species Management Plan where such species exist, in order to comply with the provisions of the European Communities (Birds and Natural Habitats) Regulations 2011-2015.	
	LR O8 Ensure that all quarrying activities and projects associated with the extractive industry comply with all relevant Planning and Environmental Legislation and the Guidelines for the Protection of Biodiversity within the Extractive Industry document 'Wildlife, Habitats & the Extractive Industry'.	No quarrying or extractive activity forms part of the Proposed Project. Construction stone and aggregate will be sourced from authorised quarries operating in accordance with their planning and environmental requirements. Please refer to **Chapter 4** of the EIAR for further details.
	LR O23 Co-operate with the relevant government departments in the protection and conservation of both the Royal and Grand Canals and the River Barrow, designated as a cNHA and SAC respectively and in the sections of the River Liffey designated as a cNHA.	The potential effects of the Proposed Project on the Grand Canal pNHA and canal corridor have been assessed in **Chapter 6, Chapter 13** and **Chapter 14** of the EIAR. The Proposed Grid Connection will cross beneath the canal by horizontal directional drilling, avoiding in-stream works and direct habitat loss. Significant residual effects are not anticipated following implementation of the proposed mitigation measures.

Policy Theme	Policy/ Objective	Compliance
	LR O39 Promote and enhance public access for all6 to the upland areas, rivers, lakes and other natural amenities of County Kildare, in conjunction with the relevant landowners and agencies, while protecting environmental sensitivities, ecological corridors and built heritage.	The Proposed Project includes a network of amenity tracks that will provide walking, trail running and other recreational opportunities and connect with local roads and existing off-site amenities. The amenity proposals have been designed with regard to ecological sensitivities and will not provide access to sensitive, designated habitats. Please refer to **Chapter 4** and **Chapter 6** of the EIAR for further details.
	LR O74 Protect and enhance existing biodiversity rich areas within state and publicly owned land, peatlands, river, canal and railway corridors, grass verges along public roads and existing and future greenways, public parks and public open spaces in towns and villages.	**Chapter 6** of the EIAR presents a comprehensive assessment of habitats, flora and fauna within the Project Site and applies the mitigation hierarchy through project design, best practice measures and the BMP in **Appendix 6-5**. The assessment concludes that, with these measures in place, significant individual or cumulative effects on ecology are not anticipated. Chapter 7 of the EIAR presents a comprehensive assessment of the potential effects of the Proposed Project on birds, including those using the peatland habitats and ecological corridors within and surrounding the Project Site. These habitats will be protected and enhanced through the Proposed Enhancement Areas, while construction-phase measures will minimise disturbance to breeding and roosting birds. With these measures in place, no significant residual effects on birds are predicted.
Lands, Soils and Geology	**LR O16** Require the undertaking of a peatland stability assessment, carbon emissions balance assessment and hydrological and ecological impact assessments, as appropriate, when developing project proposals for development on peatlands.	The EIAR includes assessments of peat stability, the overall carbon balance and the hydrological and ecological effects of the Proposed Project. A Peat and Spoil Management Plan (**Appendix 4-3**) has informed the project design, and the biodiversity enhancement

Policy Theme	Policy/ Objective	Compliance
		measures have been coordinated with ongoing peatland rehabilitation. Please refer to **Chapter 8** and **Appendix 4-3** of the EIAR for further details.
Hydrology and Hydrogeology	**BI O52** Require the preparation and submission of a Hydrological Report/Assessment for significant developments within and in close proximity to protected raised bogs and to take account of same in the assessment of impacts on the integrity of peatland ecosystems.	A detailed hydrological and hydrogeological assessment is presented in **Chapter 9** of the EIAR and considers the potential effects of the Proposed Project on protected raised bogs and peatland ecosystems. The assessment informed the drainage design and the peatland mitigation and enhancement measures. Significant residual effects are not anticipated following implementation of the proposed mitigation measures.
	IN P2 Ensure the protection and enhancement of water quality throughout Kildare in accordance with the EU WFD and facilitate the implementation of the associated programme of measures in the River Basin Management Plan 2018-2021 (and subsequent updates).	**Chapter 9** of the EIAR provides a detailed assessment of the hydrological and hydrogeological environment and includes a Water Framework Directive Compliance Assessment in **Appendix 9-4**. The drainage design incorporates measures to control, attenuate and treat runoff before discharge. With the proposed mitigation measures in place, no significant effects on surface water or groundwater quality are anticipated.
	IN O5 Manage, protect, and enhance surface water and groundwater quality to meet the requirements of the EU Water Framework Directive.	
	IN O6 Require an undisturbed edge or buffer zone to be maintained, where appropriate, having regard to the riparian buffer zones (Table 12.4 refers) to maintain the natural function of existing ecosystems associated with water courses and their riparian zones, and to enable sustainable public access. The width of the edge or buffer zone shall be determined during the appropriate environmental assessment such as EcIA or AA.	The layout of the Proposed Project was informed by 50m buffer zones around natural watercourses. Where works are necessary inside the 50m buffer zones, including at watercourse crossings, additional mitigation such as double silt fencing will be implemented. There will be no direct discharge to natural watercourses, and runoff from works areas will be attenuated and treated before being dispersed over vegetated areas. **Chapter 9** of the EIAR concludes that, with the proposed mitigation measures in place, no significant effects on the hydrological and hydrogeological environment are anticipated.

Policy Theme	Policy/ Objective	Compliance
	IN O7 Protect recognised salmonid water courses in conjunction with Inland Fisheries Ireland such as the Liffey catchment, which are recognised to be exceptional in supporting salmonid fish species.	Surface water drainage measures are detailed in **Chapter 4** and **Chapter 9** of the EIAR and shown on the planning drawings. The drainage system separates clean and dirty water, attenuates and treats runoff, and uses check dams, settlement ponds and vegetated discharge areas. No significant effects on surface water or groundwater quality are anticipated.
	IN P4 Ensure adequate surface water drainage systems are in place which meet the requirements of the EU Water Framework Directive and the River Basin Management Plan in order to promote the use of Sustainable Drainage Systems.	Flood risk and the management of surface water have been considered in the design and assessment of the Proposed Project. The drainage system includes attenuation and controlled discharge measures and has been designed to avoid increasing downstream flood risk. Please refer to **Chapter 4** and **Chapter 9** of the EIAR for further details.
	IN P5 Ensure the continued incorporation of Flood Risk Management and National Flood Risk Policy (2018) into the spatial planning of Kildare, to meet the requirements of the EU Floods Directive and the EU Water Framework Directive and to promote a climate resilient County.	**Chapter 6** and **Chapter 9** of the EIAR take into consideration the water management and biodiversity functions of boglands and wetlands. The drainage design and BMP provide for the protection of water quality, peatland rewetting and habitat enhancement. Flood risk has been considered in the design of the Proposed Project.
	IN O34 Recognise the important role of boglands, rehabilitated peatlands and other wetland areas in filtering water and contributing to sound ecological status in rivers as well as flooding patterns. Development in these areas shall be subject to a Flood Risk Assessment in accordance with the relevant guidelines.	**Chapter 9** of the EIAR provides a detailed assessment of the hydrological and hydrogeological environment and includes a Water Framework Directive Compliance Assessment in **Appendix 9-4**. The drainage design incorporates measures to control, attenuate and treat runoff before discharge. With the proposed mitigation measures in place, no significant effects on surface water or groundwater quality are anticipated.
	IN P7 Support the implementation of the Water Framework Directive, the River Basin Management Plan, and the Local Authority Waters Programme in	

Policy Theme	Policy/ Objective	Compliance
	achieving and maintaining at least good ecological status for all water bodies in the county.	The Water Framework Directive and River Basin Management Plan have been considered in **Chapter 9** of the EIAR. An AA Screening Report and NIS have also been submitted with the application. The NIS concludes that the Proposed Project will not adversely affect the integrity of any European Site.
	IN O57 Assess applications for developments, having regard to the impact on the quality of surface waters and any targets and measures set out in the River Basin Management Plan and any subsequent local or regional plans. Where developments have the potential to impact the water qualify of surface waters and/or any of the targets and measures set out in the RBMP, such a project should be subject to AA screening and where applicable, Stage 2 AA.	
	IN O58 Require development proposals which may have an impact on water quality to undertake site specific assessments to determine localised pressures and demonstrate suitable mitigation measures to protect water quality.	
Air Quality	**IN P8** Implement the provisions of EU and National legislation on air, noise, and light pollution and other relevant legislative requirements, as appropriate.	**Chapter 10** of the EIAR identifies, describes and assesses the potential significant direct and indirect effects on air quality arising from the construction, operation and decommissioning of the Proposed Project. **Chapter 10** considers the Clean Air for Europe (CAFE) Directive (Directive 2008/50/EC on ambient air quality and cleaner air for Europe) (as amended by Directive EU 2015/1480) and the Air Quality Standards Regulations 2011 (S.I. No. 180 of 2011) as amended by the Air Quality Standards (Amendments) and Arsenic, Cadmium, Mercury, Nickel and Polycyclic Aromatic Hydrocarbons in Ambient Air Regulations, 2016 (S.I. 659 2016). **Chapter 10** concludes that the production of energy from wind turbines has no direct air emissions as is expected from fossil fuel-based power stations. Harnessing more energy by means of renewable sources will reduce dependency on fossil fuels, thereby
	IN O59 Ensure that all future development is in accordance with the EU Ambient Air Quality and Cleaner Air for Europe (CAFÉ) Directive (2008/50/EC).	

Policy Theme	Policy/ Objective	Compliance
		resulting in a reduction in harmful emissions that can be damaging to human health and the environment. Short-term indirect emissions associated with the construction of the Proposed Project will include vehicular and dust emissions. Please refer to **Chapter 10** of the EIAR for further details.
Noise	**IN O65** Ensure that noise levels caused by new and existing developments throughout the county do not exceed normally accepted standards.	**Chapter 12** of the EIAR assesses construction, operational and decommissioning noise effects on local residential amenity. The assessment considers compliance with the relevant noise criteria and identifies the applicable mitigation and monitoring measures. Please refer to **Chapter 12** of the EIAR for further details.
	IN O66 Enforce and comply with European Communities (Environmental Noise) Regulations 2018 by: › Regulating and controlling activities likely to give rise to excessive noise (other than those activities which require regulation by the EPA) › Requiring new developments and / or activities likely to give rise to excessive noise to install noise mitigation measures and monitors.	
	IN O67 Ensure noise sensitive development in proximity to national and other roads provides a noise impact assessment / Acoustic Design Statement to the requirements set out in the Noise Action Plan and Local Planning Advice Notes as may issue and includes appropriate spatial consideration in the design phase and, where necessary physical mitigation measures, such as noise barriers, set back landscaping and / or buffer zones between areas of land where development is proposed and existing / proposed national or other roads.	
Light Pollution	**IN O68** Require the design of external lighting schemes to minimise the incidence of light spillage or pollution into the surrounding environment having regard to the residential amenity of surrounding areas and the need to mitigate adverse impacts on sensitive fauna and protected species.	External lighting associated with the Proposed Project will be limited to that required for safety, security and aviation compliance. Where aviation warning lighting is required, it will be provided in accordance with the requirements of the relevant aviation authorities

Policy Theme	Policy/ Objective	Compliance
		and designed to minimise unnecessary light spill. Please refer to **Chapter 4** and **Chapter 16** of the EIAR for further details.
Landscape and Visual	**LR P1** Protect and enhance the county's landscape, by ensuring that development retains, protects and, where necessary, enhances the appearance and character of the existing local landscape.	An LVIA is presented in **Chapter 13** of the EIAR and assesses the likely landscape and visual effects of the Proposed Project, including effects on landscape character, sensitive landscapes, designated views, scenic routes and residential receptors. The iterative design process included the removal of 13 turbines, the use of lower turbine tip heights around the outer parts of the layout and careful siting within a flat cutover peatland landscape to reduce visual effects. Please refer to **Chapter 13** of the EIAR for further details.
	LR O1 Ensure that consideration of landscape sensitivity is an important factor in determining development uses. In areas of high landscape sensitivity, the design, type and the choice of location of proposed development in the landscape will also be critical considerations.	
	LR O2 Require a Landscape and Visual Impact Assessment (LVIA) to accompany significant development proposals in areas of High landscape character sensitivity. A LVIA should also accompany applications for: › significant development proposals in other parts of the county, on a case-by-case basis (e.g., housing development, wind turbine and solar array developments, extractive industry, telecommunications infrastructure, afforestation and replanting of commercial forestry proposals); and › smaller scale developments taking account of the landscape sensitivity of an area and/or concerns regarding potential negative landscape or visual impacts.	
	LR O4 Ensure that local landscape features, including historic features and buildings, hedgerows, shelter belts and stone walls, are retained, protected and enhanced where appropriate, so as to preserve the local landscape and character of an area.	The Proposed Turbines are located within a working landscape of degraded cutover peatland. **Chapter 13** of the EIAR assesses the sensitivity and capacity of this landscape and concludes that its large scale, flat landform and existing pattern of energy development provide capacity to accommodate the Proposed Project.
	LR O6 Kildare County Council will have regard to the landscape character of adjoining counties, and any relevant regional strategies, when considering	

Policy Theme	Policy/ Objective	Compliance
	projects which may have a material impact on the landscape character of the adjoining counties.	
	LR O10 Recognise that the lowlands and the transitional area are made up of a variety of working landscapes, which are critical resources for sustaining the economic and social well-being of the county and include areas of significant landscape and ecological value, which are worthy of protection. Such landscapes include the internationally recognised landscape of Punchestown and its environs.	
	LR O11 Support collaboration between Kildare County Council, the Midlands Regional Transition Team and all other relevant stakeholders and the development of partnership approaches to integrated peatland management for a just transition that incorporates the management, rehabilitation and restoration/re-wetting of significant tracts of peatlands in conjunction with appropriate development after uses, in accordance with the guidance and recommendations for peatlands contained in Appendix 13 Landscape Character Assessment (2025) for the county.	The Proposed Project represents an appropriate after-use of former industrial cutover peatlands. **Chapter 6**, **Chapter 7**, **Chapter 9**, **Chapter 11** and **Chapter 13** of the EIAR assess the potential effects on habitats, water, greenhouse gas emissions and landscape character. With the proposed mitigation and enhancement measures in place, significant residual ecological and hydrological effects are not anticipated.
	LR O12 Recognise that boglands, including cutaway and cut-over bogs, are critical natural resources for ecological and environmental reasons, particularly for climate mitigation and adaptation. Have regard to relevant peatland landscape character areas (LCAs) and sensitivity classes in evaluating all project proposals. Development proposals for boglands that reduce biodiversity and increase greenhouse gas emissions will not be considered. Appropriate environmental assessment should be carried out for any development proposals which impact on boglands.	
	LR O13 Recognise that some cutaway and cut-over boglands may represent degraded landscapes and thus may potentially be fit to absorb a variety of development provided that the development proposal does not increase Green	

Policy Theme	Policy/ Objective	Compliance
	House Gas emissions or damage protected habitats or species. Projects which result in increases in ammonia emissions to watercourses will not be considered.	
	LR O17 Control development that will adversely affect the visual integrity of Areas of High Amenity by restricting the development of incongruous structures that are out of scale with the landscape within the Areas of High Amenity including advertising signs, hoardings, fencing etc. which create visual clutter and disrupt the open nature of these areas.	The Proposed Turbines are sited within a flat, low-lying cutover peatland landscape and are not located on steep slopes or ridgelines. The layout uses lower turbine tip heights around the outer parts of the Proposed Wind Farm and removes visually disconnected turbines, reducing visual dominance from scenic upland viewpoints. Please refer to **Chapter 13** of the EIAR for further details.
	LR O19 Restrict the over development of the edge of the Curragh Plains and development that obtrudes on the skyline as viewed from the Plains.	
	LR P3 Protect, sustain and enhance the established appearance and character of all important views and prospects	
	LR O32 Avoid any development that could disrupt the vistas or have a disproportionate impact on the landscape character of the area, particularly upland views, river views, canal views, views across the Curragh, views of historical or cultural significance (including buildings and townscapes), views of natural beauty and specifically those views listed in Tables 13.5 – 13.7 of this plan.	
	LR O33 Ensure developments (due to excessive bulk, scale, inappropriate siting or siting on steep slopes i.e. >10%) do not have a disproportionate visual impact or significantly interfere with or detract from scenic upland vistas when viewed from nearby areas, scenic routes, viewpoints and settlements.	
	LR O34 Control development that will adversely affect the visual integrity of distinctive linear sections of water corridors and river valleys and open floodplains.	**Chapter 13** of the EIAR provides a detailed assessment of the designated views identified in the Kildare County Development Plan. The assessment uses ZTV mapping, field appraisal, route screening,

Policy Theme	Policy/ Objective	Compliance
	LR O35 Encourage appropriate landscaping and screen planting of developments along scenic routes. Where scenic routes run through settlements, street trees and ornamental landscaping may be required **LR O38** a. To protect designated views of special amenity value identified in the Plan [see Tables 13.5 / Scenic Routes, Table 13.6: Hilltop Views, Views from Bridges / Table 13.7 Views from Bridges or other land use plans and ensure that development proposals do not have an undue detrimental impact on these views. b. Development proposals will be assessed against their impact on the designated view if it falls within the foreground, middle ground or background of that view. New development should not harm, and where possible, should make a positive contribution to, the characteristics and composition of the designated views and their landmark elements. c. Development proposals that could affect a designated view should be accompanied by an assessment that explains, evaluates and justifies any visual impact on the view affected. The scoping process for determining whether a development proposal is likely to affect a designated view should be completed in consultation with Kildare County Council. The assessment should demonstrate that the proposal is consistent with the relevant objectives of this Plan. The assessment should form part of a landscape and visual impact assessment, design statement or townscape and visual impact assessment submitted with a planning application. d. Development in the foreground and middle ground of a designated view should not be overly intrusive, unsightly or prominent to the detriment of the view. Most designated views are seen in a 120-degree	photomontages and photowires to evaluate effects in the foreground, middle ground and background of each relevant view. Embedded design measures have reduced the extent of significant visual effects to a limited number of elevated viewpoints and short sections of scenic routes.

Policy Theme	Policy/ Objective	Compliance
	field of view. It is not expected that the view outside of this field of vision should be assessed unless specified by Kildare County Council. Designated views of special amenity value and views of local landmark buildings / other local views of significance will need to be considered in the scoping of views to identify the potential impacts of development proposals	
Material Assets - Waste	**IN P6** Implement European Union, National and Regional waste related environmental policy, legislation, guidance, and codes of practice, in order to support the transition from a waste management economy towards a circular economy.	A Resource Waste Management Plan (RWMP) has been prepared and forms part of the CEMP in **Appendix 4-4** of the EIAR. The RWMP outlines the methods of waste prevention and minimisation by recycling, recovery and reuse at each stage of construction of the Proposed Project. Disposal of waste will be a last resort. The RWMP has been produced in line with the following guidance '*Best Practice Guidelines for the Preparation of Resource & Waste Management Plans for Construction & Demolition Projects*' (EPA, 2021). Please refer to **Appendix 4-4** of the EIAR for further details.
Cultural Heritage	**AH P1** Recognise the value and opportunity of Kildare's unique heritage resource and to manage, conserve, promote and protect it, for present and future generations.	**Chapter 14** of the EIAR presents the results of an archaeological, architectural and cultural heritage impact assessment of the construction, operation and decommissioning of the Proposed Project. The assessment concludes that no significant direct or indirect effects to the recorded cultural heritage resource as a result of the Proposed Project have been identified. Where potential direct effects to sub-
	AH P2 Protect and enhance archaeological sites, monuments and where appropriate and following detailed assessment, their setting, including those that are listed in the Record of Monuments and Places (RMP) or newly discovered archaeological sites and/or subsurface and underwater archaeological remains.	

Policy Theme	Policy/ Objective	Compliance
	AH O2 Manage development in a manner that protects and conserves the archaeological heritage of County Kildare, avoids adverse impacts on sites, monuments, features or objects of significant historical or archaeological interest and secures the preservation in-situ or by record of all sites and features of historical and archaeological interest, including underwater cultural heritage. The Council will favour preservation in – situ in accordance with the recommendation of the Framework and Principles for the Protection of Archaeological Heritage (1999) and the Council will seek and have regard to the advice and recommendations of the Department of Housing, Local Government and Heritage.	surface archaeology have been identified, appropriate mitigation measures are proposed in order to ameliorate this potential effect. Please refer to **Chapter 14** of the EIAR for further details.
	AH O3 In co-operation with the National Monuments Service, Department of Housing, Local Government and Heritage require archaeological impact assessment, surveys, test excavation and/or monitoring and/or underwater archaeological impact assessments for planning applications in areas of archaeological importance and where a development proposal is likely to impact upon in-situ archaeological monuments, their setting and archaeological deposits, based on recommendations of a suitably qualified archaeologist and the Council will seek and have regard to the advice and recommendations of the Department of Housing, Local Government and Heritage.	
	AH O4 Ensure that development in the vicinity of a site of archaeological interest is not detrimental to the character of the archaeological site or its setting by reason of its location, scale, bulk or detailing and to ensure that such proposed developments are subject to an archaeological assessment prepared by a suitably qualified archaeologist. Such an assessment will seek to ensure that the development can be sited and designed in such a way as to avoid impacting on archaeological heritage that is of significant interest including previously unknown sites, features, objects and areas of underwater archaeological heritage.	

Policy Theme	Policy/ Objective	Compliance
	AH O5 Require the preservation of the context, amenity, visual integrity and connection of the setting of archaeological monuments. As a general principle, views to and from archaeological monuments shall not be obscured by inappropriate development. Where appropriate, archaeological visual impact assessments will be required to demonstrate the continued preservation of an archaeological monument's siting and context.	
	AH O6 Secure the preservation in-situ or by record of: › the archaeological monuments included in the Record of Monuments and Places as established under section 12 of the National Monuments (Amendment) Act, 1994 › any sites and features of historical and archaeological interest including underwater cultural heritage and protected wrecks. › any subsurface archaeological features including those underwater, that may be discovered during the course of infrastructural/development works in the operational area of the Plan. Preservation relates to archaeological sites or objects and their settings.	
Kildare Biodiversity Action Plan	**Objective 1 – Landscapes for Nature** **1.6** To support the implementation of Objective BI A31 in the County Development Plan; Work with Bord Na Mona and other stakeholders to prepare a Green Infrastructure Masterplan that will inform the delineation of core areas, stepping stones and corridors (long distance peatways) that may inform the designation of an interconnected Bog of Allen Nature Reserve, Special Amenity Area Order and/or National Peatlands Park.	The Proposed Project will not preclude the preparation of a Green Infrastructure Masterplan for the Bog of Allen. The BMP enhancement measures (**Appendix 6-5**) and the proposed amenity track network will strengthen ecological connectivity and could form part of a future peatway network, Bog of Allen Nature Reserve and/or National Peatlands Park. Please refer to **Chapter 4** and **Chapter 6** of the EIAR for further details.

Kildare County Development Plan 2023-2029 Wind Energy Strategy

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

The WES identifies key areas within the County that are designated as '*Areas Deemed Open for Consideration for Wind Energy Developments'* and '*Areas Not Deemed Suitable for Wind Energy Developments'*. Please refer to **Table 7-7** below for further details.

Table 7-7 Kildare County Development Plan 2021-2027 Wind Energy Strategy Designation Areas

Offaly County Council – Wind Energy Strategy Designation Areas	
Strategy Designation Areas	**Description**
Acceptable in Principle	This is the preferred area for wind energy development characterised by a robust landscape, a low housing density, adequate windspeeds and proximity to the existing electricity transmission and distribution grid, while having no significant conflicts with natural heritage designations. 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.
Open for Consideration	This area is characterised by medium landscape sensitivity 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.
Not Normally Permissible	This area is considered to be generally unsuitable for wind farm development as it is defined by highly sensitive landscapes, settlements, designated sites, areas of aviation significance and/or low windspeeds. Individual small-scale turbines and community led initiatives may be considered on a case-by-case basis. Any development in this area will be subject to compliance with planning and environmental criteria outlined in Section 5 of this report and the development management standards in the County Development Plan.

As shown in

below the Proposed Turbines are located within an area designated ***'Open for Consideration'*** for Wind Energy Developments. Furthermore, as detailed in **Table 7-6** above, it has been demonstrated that the Proposed Project aligns with the relevant policies and objectives of the KCDP and a statement of compliance with each of the Development Management Standards as set out in Chapter 15 of the KCDP has been provided in **Table 7-8** below. Please refer to in **Table 7-6** and **Table 7-8** for further details.

Development Management Requirements

Section 15.11.1 Energy and Communications of Chapter 15 of the KCDP sets out the Development Management Standards that the Planning Authority may consider when considering applications for wind energy developments such as the Proposed Project. The Proposed Project is assessed against each of the requirements as set out in Table **7-8** below.

Table 7-8 Kildare County Development Plan 2023-2029 Wind Energy Development Management Standards

Local considerations taken into account by the Council	Compliance
› When assessing planning applications for wind energy developments the Council will have regard to the Kildare Wind Energy Strategy contained in Appendix 2 of the Development Plan. The Strategy designates areas across the county where wind energy developments are acceptable in principle, open for consideration and not normally permissible. These designated areas indicate where wind energy is favoured spatially by the council over this Development Plan period.	As shown in **Figure 7-2** above, the Proposed Turbines are located within an area designated as *'Open for Consideration'* for wind energy developments as per the KCDP WES.
› All wind energy developments require compliance with the provisions of the Department of the Environment, Heritage and Local Government's Draft Revised Wind Energy Development Guidelines (2019).	All Proposed Turbines comply with the minimum 500 m setback in the WEDG 2006 and the four times tip height setback in the Draft WEDG 2019. No inhabitable dwelling is located within 880 m of a Proposed Turbine. The closest inhabitable dwelling is approximately 894 m from the nearest Proposed Turbine, T16. In relation to noise and shadow flicker, **Chapter 5** of the EIAR states that detailed noise and shadow flicker modelling have been carried out as part of the EIAR, which shows that the Proposed Wind Farm will be capable of meeting all required guidelines in relation to noise thresholds set out in the WEDG 2006, and noise and shadow flicker can be controlled to meet the Draft WEDG 2019 standards if adopted. In terms of location, spatial extent, spacing and layout, **Chapter 13** of the EIAR states that the siting and design of the Proposed Project adhere to the guidance for the siting of wind farms in Flat Peatland Landscapes as set out in the WEDG 2006 and Draft WEDG 2019. Please refer to **Chapter 5**, **Chapter 12** and **Chapter 13** of the EIAR for further details.

› Applications shall be supported by both technical and environmental reports which assess a wide variety of considerations which are outlined in detail in Section 6 of the Wind Energy Strategy.	The Proposed Project is accompanied by an EIAR, NIS and supporting technical documentation, which provide detailed assessments in relation to environmental and technical considerations as identified in Section 6 of the WES.
› The Council may also require an Environmental Impact Assessment Report to be submitted as part of any planning application for large scale commercial wind turbine schemes.	The Proposed Project is accompanied by an EIAR, NIS and supporting technical documentation.
› It is the preference of the Planning Authority that the spacing between turbines should be kept to a minimum in order to reduce the visual impact and footprint of the development on the landscape, and where possible the distance between turbines should not be greater than the distance between a dwelling house and a turbine, subject to technical considerations and site conditions	The spacing of the Proposed Turbines was developed through an iterative layout design process to keep the development footprint and visual effects to a minimum while meeting technical requirements for wake and turbulence effects, energy yield, environmental constraints and safety. The resulting clustered layout keeps turbine separation to the minimum technically practicable while maintaining the required setbacks and site-specific constraints. Turbines with a 200 m tip height are located around the outer parts of the layout, with 220 m turbines concentrated centrally to reduce visual effects. Please refer to **Chapter 3**, **Chapter 4** and **Chapter 13** of the EIAR for further details.

672000

N

Killane

R441

Drumcooly

Dreenan

Ticknevin

R403

Killinagh Lower

Allenwoo South

R414

R401

Church Road

Clonbullogue

R442

Feighcullen

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 2 4 6 8 Kilometers

672000

Legend

- Project Site
- County Boundaries

Proposed Turbine Layout

- 220
- 200

Offaly Wind Energy Strategy

- Areas Open for Consideration
- Area Not Deemed Suitable

Kildare Wind Energy Strategy

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

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

SITE LOCATION - NOT TO SCALE

Drawing Title
Local Authority Wind Strategy Areas within and around the Project Site

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

Project No.	Drawing No.	Scale
250708	7-1	1:70,000
Drawn By	Checked By	Date
TI	CF	08/10/2026

MKO
Email: info@mkoireland.ie/ Website: www.mkoireland.ie

8. PLANNING ASSESSMENT

The Proposed Project has been subject to a rigorous design process informed by a comprehensive planning and environmental assessments and surveys, which have collectively concluded that the proposal is in line with proper planning and sustainable development of the area. The Proposed Project has been designed in compliance with the WEDG 2006 and it has been demonstrated that the requirements of the Draft WEDG 2019 can also be achieved.

8.1 Strategic Need for the Proposed Project

The global climate is undergoing significant changes, primarily driven by greenhouse gas emissions from the burning of fossil fuels. News stories of climate change-related extreme weather events are now a constant in the daily news cycle. According to the World Meteorological Organisation's '*State of the Global Climate 2025'* published in March 2026[9], atmospheric concentration of CO_2 in 2024 reached the highest levels in the last 2 million years, and methane and nitrous oxide reached their highest levels in the last 800,000 years. The annual carbon dioxide concentration increase in 2024 was the largest increase since 1957, when modern measurements began. The report also states that the year 2024 was the warmest year on observational record, with temperatures at 1.55 °C ± 0.13 °C above the 1850–1900 average.[10] The year 2025 was the second or third warmest year (depending on the datasets used) in the 176-year record[11].

"The European State of the Climate Report 2025" produced by WMO and European Union[12] 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 impacts of climate change are currently being felt, the severity of which is expected to increase with further greenhouse gas emissions. The *"Annual Climate Statement for 2025"* produced by MET Eireann[13], 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.

[9] *State of the Global Climate 2025 (World Meteorological Organisation, March 2026)*
[10] *State of the Global Climate 2025 (World Meteorological Organisation, March 2026)*
[11] *State of the Global Climate 2025 (World Meteorological Organisation, March 2026)*
[12] *The European State of the Climate Report 2025 (World Meteorological Organization and European Union, April 2026)*
[13] *Annual Climate Statement for 2025 (MET Eireann, January 2026)*

- 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.

To mitigate climate change, Ireland must decarbonise its economy by 2050. There is an urgency to ensure that real changes occur without delay, which means that a gradual shift towards increasing Ireland's use of renewable energy generation is no longer viable. Over the last 25 years, Ireland has become a world leader in onshore wind energy, with a total of 32.1% of the Ireland's gross electricity supply from onshore wind in 2025[14]. As a country, Ireland only became a world leader by consenting and building one wind farm at a time.

Since 1992, Ireland has installed 5,000 MW of onshore wind. Now, with the 2025 Climate Action Plan requiring the amount of onshore wind energy to increase from 5,000 MW to 9,000 MW by 2030, Ireland must install almost double its existing capacity in under 5 years. To reach this target, hundreds of additional wind farms will have to be connected to the national grid over the rest of this decade. The scale of Ireland's challenge was quantified in the 2024 Climate Action Plan, which states that *'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).

The EPA report Ireland's Greenhouse Gas Emissions Projections 2025–2030 (May 2026) highlights that Ireland is not on track to meet its national target of reducing greenhouse gas emissions by 51% by 2030, relative to 2018, as required under the Climate Act. Ireland is also projected to fall short of its 2030 target under the EU Effort Sharing Regulation, which requires a 42% reduction in greenhouse gas emissions in the sectors covered by the Regulation compared with 2005 levels. Similarly, the Climate Change Advisory Council's 2026 Annual Review highlights that the pace of renewable electricity deployment and grid reinforcement remains insufficient to meet Ireland's 2030 Climate Action Plan targets, with substantially greater renewable capacity required each year[15].

As a nation, Ireland is legally bound to its climate targets. 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. Section 15(1) of the Climate Act requires public bodies (including the planning authorities) to carry out its functions consistently, insofar as practicable, with specified climate plans and objectives, including the latest, which includes CAP25.

Ireland is also legally bound by renewable energy targets at a European level. The latest revision of the Renewable Energy Directive (RED III) introduced a binding EU-wide target for overall Renewable Energy Share (RES) of at least 42.5% by 2030 and requires Member States to set their national contributions to the EU-wide target. In accordance with RED III and the revised RES target, the Department of the Environment, Climate and Communications have published an updated National Energy and Climate Plan 2021-2030 in July 2024. The updated NECP committed to achieving a 43% share of renewable energy in total energy consumption by 2030. The updated NECP states that Ireland's proposed trajectory will not be in line with the desired trajectory set out in the Governance Regulation (Regulation 2018/1999).

Every viable renewable energy project plays 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 not just beneficial, it is imperative. Without decisive action to facilitate renewable energy deployment, Ireland risks missing national and EU commitments, incurring financial penalties, and undermining energy security.

[14] *Energy in Ireland (Sustainable Energy Authority of Ireland, October 2026)*
https://www.seai.ie/sites/default/files/publications/Energy-in-Ireland-2025.pdf
[15] *Annual Review 2025 – Summary for All (CCAC, November 2025)*
https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR-2025-SfA-final.pdf

8.2 Compliance with Planning Policy

The provision of renewable energy developments such as the Proposed Project is strongly supported by European, national, regional and local policies and guidelines aimed at achieving the transition to a low carbon and climate resilient economy, increasing renewable energy generation, and enhancing energy security. Specifically, the Proposed Project will contribute to achieving the target of generating 9GW of electricity from onshore wind and reducing greenhouse gas emissions by 80% by 2030 as set out in the CAP25. The comprehensive suite of European, national, regional and local policy support for wind energy, demonstrates that the principle of the Proposed Project at this location is acceptable and suitable for wind energy development.

At a European level, the Proposed Project will support Ireland in reaching its legally binding obligations as an EU Member State of achieving at least 42.5% renewable energy by 2030, as set out in REDIII. Furthermore, the REPowerEU plan aims to increase energy security within the EU and increase the share of renewable energy onto the EU electricity grid by *'Speeding up renewables permitting to minimise the time for roll-out of renewable projects and grid infrastructure improvements'*.

The Proposed Project aligns with National Strategic Outcome 8 and Objectives outlined in the Revised NPF, particularly Objective 70, which 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 contribute to the substantial Regional Renewable Electricity Capacity Allocation for the Eastern and Midland Region (1,966MW). The location of the Proposed Project on a post-industrial peatland site is fully aligned with the Revised NPF's focus on the development of renewable energy on the extensive tracts of publicly owned peat extraction areas in the Eastern and Midland Region.

Regionally, the Proposed Project will support the future growth of renewable energy technology in the Eastern and Midland Region as called for in the RSES which sets a clear precedent to identify and capitalise on those opportunities associated with the transition to renewable energy generation.

At a local level, the OCDP and KCDP support the Proposed Project by recognising the need for Offaly and Kildare to transition to low-carbon, climate-resilient counties through increased renewable energy generation, thereby enhancing energy sustainability and security. Specifically, a strategic aim of the OCDP is to transition to a competitive, low-carbon, climate-resilient and environmentally sustainable economy, the Proposed Project will support the OCDP in this aim. Similarly, the KCDP aims to support energy efficiency and achieve a reasonable balance between responding to EU and national policies on climate change and renewable energy, while enabling renewable energy resources to be harnessed in a manner consistent with the proper planning and sustainable development of the County.

Compliance with all relevant policies within the OCDP and KCDP is demonstrated in **Table 7-3** and **Table 7-6** above.

In summary, the Proposed Project provides the opportunity to significantly contribute to energy and climate targets in a manner which is in accordance with planning policy at all levels.

8.3 Compliance with Legislation

This planning application has been prepared in accordance with Section 37 of the Planning Act. Pre-application consultation with ACP was undertaken in accordance with Section 37B and the application has been prepared in accordance with the requirements for an application under Section 37E, including the requirements under REDIII.

The Proposed Project is also consistent with the Climate Act and the legal requirement for the State to achieve a 51% reduction in emissions by 2030.

The application for development permission is accompanied by an EIAR and NIS in accordance with the requirements of the Planning Act and the Planning and Development Regulations 2001, as amended.

8.4 EIAR Findings

The purpose of the EIAR is to document the current state of the environment on and in the vicinity of the Project Site and to determine the likely significant effects of the Proposed Project on the environment and where mitigation measures may be required.

A high-level overview of the findings of the EIAR is as follows:

Four EIAR Chapters have identified significant positive effects

- **Chapter 10 Air Quality** and **Chapter 11 Climate** each identify a significant positive impact on air quality and climate, respectively, due to the provision of alternative to electricity derived from coal, oil or gas-fired power stations during the operational phase. The Proposed Project will result in emission savings of carbon dioxide (CO2), oxides of nitrogen (NOx), and sulphur dioxide (SO2). Chapter 5 Population and Human Health also identifies a long-term, significant, positive effect arising from improved air quality, and Chapter 15 Material Assets identifies a long-term, significant, positive effect on electricity supply.

Post mitigation, two EIAR Chapters have identified significant negative effects.

- In **Chapter 13 Landscape and Visual**, significant negative residual visual effects are identified at 4 no. representative viewpoints, reflecting the sensitivity of the visual receptors and the magnitude of change experienced at those locations. The higher ratings of significance at these viewpoints are due to the high sensitivity of the visual receptors, namely local residents living in close proximity to the Proposed Turbines and receptors at designated scenic routes, hilltop views and areas of high amenity, combined with a Moderate or Substantial magnitude of change.
- In **Chapter 16 Aviation**, a significant negative effect is identified in relation to the impact on the Edenderry /Allenwood/ Rathangan Low Flying Training Area (LFTA). The Applicant will engage with the DoD/Irish Air Corp ahead of construction to facilitate an alternative location for LFTAs within their landbank. If an alternative area is confirmed there will be no impact on the Edenderry/ Allenwood/ Rathangan LFTA. **Chapter 5 Population and Human Health** also identifies a significant negative effect due to the proximity of the construction phase activities may constitute a hazard to helicopters engaged in off-airfield landing training. Due to the unknowns associated with the exact activities taking place within the LFTA an associated impact cannot be confirmed. Under a precautionary scenario, a long-term, significant negative impact on human health has been identified during the construction phase.

Post mitigation, all other EIAR Chapters do not identify any significant effects. It is noted that the Environmental Impact Assessment will be undertaken by the Commission as the competent authority.

8.5 NIS Findings

The NIS has assessed the impacts of the construction, operation and maintenance and decommissioning of the Proposed Project on European Sites and their relevant Qualifying Interests to determine whether the Proposed Project will have an adverse effect on the integrity of European Sites, either alone or in combination with other plans or projects and in light of the conservation objectives of the sites. The assessment concluded that there will be no adverse effect on the integrity of any European site, either as a result of the Project alone or in combination with other plans or projects, provided that the mitigation listed is adhered to.

Therefore, it can be objectively concluded, following an examination, analysis and evaluation of the relevant information, including in particular the nature of predicted impacts, that the Proposed Project, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site in light of its conservation objectives and best scientific information, and there is no reasonable scientific doubt in relation to this conclusion.

8.6 Principle of Development

There exists a comprehensive platform of policy support for wind energy at a European, national, regional and local level that supports the principle of renewable energy development at the site to be acceptable at this location.

The Proposed Project is in accordance with and has the support of European, national, regional policies pertaining to achieving the transition to a low-carbon economy, climate resiliency, increasing renewable energy generation, and enhancing energy security.

At a local level, the Proposed Project aligns with the objectives of the OCDP and KCDP, which seek to support the transition to a low-carbon, climate-resilient economy through increased renewable energy generation. The portion of the Proposed Project located within County Offaly is designated as *'Open for Consideration'* for wind energy development under the OCDP WES, while the portion located within County Kildare is similarly designated as *'Open for Consideration'* under the KCDP WES.

As outlined in Section 8.4 above, a comprehensive Environmental Impact Assessment has been undertaken for the Proposed Project, with the findings presented in the EIAR. The assessment has identified both significant positive and negative environmental effects associated with the Proposed Project, taking account of the mitigation measures proposed, where relevant.

As concluded in the NIS and outlined **in Section 8.5** above, all potential effects arising from the Proposed Project have been mitigated to the extent that there is no potential for adverse effects on the integrity of any European Site, as a result of the Proposed Project.

As such the principle of development is considered to be acceptable and in accordance with proper planning and sustainable development.

9. CONCLUSION

The provision of the Proposed Project is strongly supported by European, national, regional and local policies and guidelines aimed at achieving the transition to a low-carbon and climate-resilient economy, increasing renewable energy generation, and enhancing energy security. Specifically, the Proposed Project will contribute to achieving the target of generating 9GW of electricity from onshore wind, 80% renewable electricity by 2030, and reducing greenhouse gas emissions by 51% by 2030 as set out in the CAP25.

The Proposed Project aligns with National Strategic Outcome 8 and Objectives outlined in the Revised NPF, particularly Objective 70, which 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.

CAP25 highlights 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*". To achieve this, greater alignment between local plans and national and regional renewable energy policy and targets is urgently required. If permitted, the Proposed Project will add c. 322MW of renewable, clean energy to Ireland's national wind energy capacity. This will not only contribute to the decarbonisation of the electricity sector but will play a role in the decarbonisation of other sectors and the transition to a low-carbon, climate-resilient economy. By harnessing indigenous wind resources and generating and providing renewable onshore wind energy, the Proposed Project will enhance Ireland's energy security by reducing reliance on imported fossil fuels.

It is acknowledged that, as a significant infrastructure project, the Proposed Project will have an impact on the receiving environment in which it is proposed. The application for the Proposed Project recognises the parallel interests of tackling climate change while aiming to safeguard residential amenity and to protect species and habitats. Consideration of this fact has been central to the design of the Proposed Project and in the preparation of the EIAR, NIS, and mitigation measures proposed.

Ultimately, it is considered that this Proposed Project is in accordance with the provisions of proper planning and sustainable development and due to the suitability of the site and the urgent need for renewable energy development of this scale. National climate and renewable energy objectives, and the decarbonisation of Irish society as a whole is dependent on the rapid expansion of wind energy in Ireland. The scale of the challenge Ireland faces in decarbonising its economy is enormous, but the climate change implications of not doing so are even greater. The Proposed Project will support the decarbonisation of the electricity sector and the decarbonisation of other sectors, reducing reliance on imported fossil fuels for energy generation and enhancing Ireland's energy security.

Having regard to the key points set out in this Report, it is respectfully requested that ACP considers the relevant planning context that applies, and grants permission for the Proposed Project which is the subject of this application.

