5.0 POLICY PLANNING AND DEVELOPMENT CONTEXT

5.1 INTRODUCTION

This chapter considers the proposed development in terms of legislative context and in relation to International, Strategic, National, Regional and Local Planning policies and objectives, in order to ascertain whether it is consistent with the relevant legislation and with the proper planning and sustainable development of the area. This chapter includes a review of the planning history, the planning and development context and the planning need for the proposed development.

The nature and location of the proposed development is described in Chapter 3 (Description of the Proposed Development) and will include 22 no. wind turbines located on three bogs within the Mountdillon Bog Group. The proposed wind farm site has a total area of approximately 1,900 hectares and is located across three bogs (Derryaroge, Derryadd and Lough Bannow) within the Mountdillon Bog Group in Co. Longford. The closest settlements to the proposed wind farm site are Derraghan village and Lanesborough town located approximately 200 m and 500 m west, respectively. Derryaroge Bog to the north is adjacent to the River Shannon and Lough Bannow Bog is approximately 0.5 km to the west of the Royal Canal which runs in a northwest to east direction. Please refer to Section 3.2 of Chapter 3 (Description of the Proposed Development) which includes a map containing the site location and layout of the proposed wind farm.

As such, the proposed wind farm is located primarily within the functional area of Longford County Council and is thus informed by the provisions of the Longford County Development Plan 2021-2027. The proposed development includes temporary accommodating works relating to the proposed Turbine Delivery Route (TDR), on third party land in Roscommon town (refer to Section 3.3.15 in Chapter 3 for a full description of the temporary works and Appendix 15-3 of Chapter 15 Traffic and Transport for Pell Frischmann (2023) report) which details the accommodate works that are required for turbine delivery which falls within the functional area of Roscommon County Council).

The relevant Global, European, National, Regional and Local climate, energy and planning policies as set out in Section 5.7 of this chapter emphasise the need to generate renewable energy and the importance of moving towards decarbonising the economy. If approved the proposed development can contribute to the delivery of the overarching policy aims that exist within Ireland and can lead to the expansion of the renewable wind resource in Ireland and contribute towards Governmental, National and Regional goals and targets by generating more power from renewable resources.

The 2009 EU Renewable Energy Directive (2009/28/ EC) set Ireland a legally binding target to meet 16% of our energy requirements from renewable sources by 2020. In 2018, the Directive was recast (2018/2001/EU) to move the legal framework to 2030 targets, setting a new binding

target of at least 32% with a clause for a possible upwards revision by 2023. In 2023, the Directive was further amended to set a new binding renewable energy target of at least 42.5% at EU level, but aiming for 45%, emphasising a growing obligation for Ireland to develop renewable energy sources.

It is established that Ireland has not met the 2020 renewable energy targets. A report issued by the Sustainable Energy Authority of Ireland (SEAI) entitled 'Renewable Energy in Ireland – 2020 Update' shows that Ireland is still heavily dependent on fossil fuels[1]. Out of the 27 EU member states, plus the UK, Ireland had made the second lowest progress towards hitting the targets. Ireland will be subject to tariffs through the EU Emissions Trading System (ETS) until these targets are realised. More recently, a report published in 2023 by the SEAI titled 'Energy in Ireland'[2], states that 'even with a full delivery of the policies and measures identified in the Government's 2023 Climate Action Plan (CAP23), the energy sector will likely still be off-track to keep within its share of Ireland's legally binding carbon budgets'. The report also found 85.8% of primary energy came from oil, natural gas, coal, and peat in 2022 with only 13% of Ireland's primary energy requirement coming from renewables in 2022.

The Irish Government published the final Climate Action Plan 2024 (CAP24) on 21 May 2024 which sets ambitious actions to ensure our 2030 targets can be achieved. It has been published in the context of substantial and continuing failure by Ireland in meeting climate targets to date. CAP24 recognises that Ireland must significantly increase levels of renewable energy in the country and sets out the roadmap to deliver Ireland's climate ambition which aligns with legally binding economy-wide carbon budgets and sectoral ceilings. CAP 24 aims to build on the progress made under CAP23 which stated "transformational policies, measures and actions, and societal change are required to increase the deployment of renewable energy generation, strengthen the grid, and meet the demand for flexibility in response to the challenge" by delivering policies, measures and actions that will support the achievement of our carbon budgets, sectoral emissions ceilings, and 2030 and 2050 climate targets.

The purpose of this chapter is to analyse the policy structure that has been put in place to facilitate renewable energy development in Ireland and will concentrate on the following policy structure, EU, National, Regional, County and where relevant local. This chapter will include a full review of the relevant wind energy development policies included in the Longford County Development Plan. The wind farm site is currently identified in the Longford County Development Plan (CDP) 2021-2027 as a 'Preferred Location', suitable for the erection of large-scale wind farms.

The site on which the proposed wind farm will be located is on cutaway peatland which has been historically used for peat extraction by Bord na Móna. All peat extraction activities ceased in 2019. A full description of the proposed development is provided in Chapter 3 (Description of the Proposed Development) of this EIAR.

[1] https://www.seai.ie/publications/2020-Renewable-Energy-in-Ireland-Report.pdf
[2] Energy In Ireland | Key Publications | SEAI

5.2 PLANNING LEGISLATION

The 7th Schedule of the Planning and Development Act 2000 (as amended) sets out classes of development which, following consultation with An Bord Pleanála (the Board), may be considered to constitute Strategic Infrastructure Development (SID) under Section 37A of that Act. Class 1 of the 7th Schedule includes the following:

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

The proposed development will have an output in excess of 50 Megawatts. In view of the fact that the proposed development fits into this category, consultations were held with the Board under Section 37B of the Planning and Development Act (as amended). The Board, by way of letter dated 29th August 2023, issued a determination (Case Ref ABP-314965-22) that confirmed that the proposed development falls within the scope of paragraphs 37A(2)(a), (b) and (c) of the Act. Accordingly, the Board have confirmed that the proposed development would be Strategic Infrastructure as defined under Section 37A of the act, and that any application for permission must therefore be made directly to the Board. A copy of the Board's determination is included in Appendix 1-1 of this EIA.

5.3 SITE PLANNING HISTORY

A review of the Longford County Council planning register[3] and An Bord Pleanála map search portal[4] was conducted to determine the planning history within the proposed wind farm site. There have been a number of previous planning applications on the proposed wind farm site as set out in Table 5.1 below.

While the previous Derryadd Wind Farm planning application has informed the site selection and suitability of the area for wind energy, it has not been considered under cumulative assessment due to the permission being overturned.

Table 5.1: Historical Permissions within the proposed wind farm site

Register Reference	Description of Development	Year of Decision
Longford Co, Co. Reg. Ref. 08/623	Grant of permission for a wind monitoring mast at Derryaroge. This permission was for a period of five years.	20/03/2009
Longford Co, Co. Reg. Ref. 14/35	Grant of permission for retention of a wind monitoring mast at Derryaroge. This refers to the same mast as permitted under 08/623. This revised permission was granted for a period of 10 years.	06/05/2014

[3] Accessed at: ePlan::Find a planning application (eplanning.ie)
[4] Accessed at: Map Search | An Bord Pleanála (pleanala.ie)

Longford Co, Co. Reg. Ref. 15/86	Grant of permission (dated 25/08/15) for a wind monitoring mast at Derrynaskea (Lough Bannow Bog). This permission was granted for a period of five years.	25/08/2015
ABP Ref. PL14.PC0233	Request to enter into pre-application consultation pursuant to Section 37A of the Planning and Development Act 2000, as amended for a proposed wind farm of 29 wind turbines with an output of 90MW located in various townlands in County Longford. It was determined Strategic Infrastructure Development.	22/06/2018
Longford Co, Co. Reg. Ref. 20/183	Continued use of an existing guyed wind monitoring mast, with instruments, 100m in height for a further period of three years, the purpose of the mast is to assess the suitability of the company's adjacent lands for wind farm development, previous planning application number 15/86.	05/11/2020
Longford Co, Co. Reg. Ref. 23/108	Continued use of an existing guyed wind monitoring mast, with instruments, 100m in height for a further period of three years. The purpose of the mast is to assess the suitability of the company's adjacent lands for wind farm development. Previous planning application numbers: 15/86 and 20/183 on its lands.	09/01/2024
ABP Ref. 303592	A 10-year planning permission for the construction of a wind farm comprising 24 no. wind turbines, 1 no. 110kV substation and all related works.	Decision Quashed by High Court on 14/02/2022
ABP Ref. 313897	Application for Leave to Apply for Substitute Consent for peat extraction and all associated bog development works.	Withdrawn
ABP Ref. 318974	Request to enter into pre-application consultation for a future substitute consent application pursuant to Section 177E(1A) of the Planning and Development Act 2000, as amended.	Consultation concluded
Longford Co, Co. Reg. Ref. 22/275	Permission for an underground electrical cable and transformer compound which will connect permitted solar farms within the townlands of Middleton, Ballycore, Treamboy, Newtown, Ballynakill, Bunacloy to the national grid via the proposed transformer compound at Lough Ree Power Station.	19/05/2023

ABP Ref. SU14.322204	Application for Leave to Apply for Substitute Consent for peat extraction and all associated bog development works.	Undecided

5.4 WIND FARMS WITHIN 20 KM

A review of the Roscommon, Longford and Westmeath County council planning registers[5], An Bord Pleanála website, EIA Planning Portal[6], Wind Energy Ireland (WEI) and SEAI Wind Atlas[7] produced a list of permitted wind farm developments which are within the 20 km study area surrounding the proposed development, as listed in Table 5.2 below.

[5] Sourced from: IrishPlanningApplications - Dataset - data.gov.ie
[6] EIA Portal
[7] Accessed at: Wind Atlas (arcgis.com)

Table 5.2: Wind Farm Developments within 20 km

Register Reference	Description of Development	Location	Year of Decision	Distance to Proposed Wind Farm site	Status[8]
Skrine Wind Farm 04/103 (ABP Ref. 20.208733)	Permission for 3 no. wind turbine generators, meteorological tower, substation, substation compound and associated site access roads. According to SEAI wind Atlas Data, this wind farm has been connected since November 2011.	Skrine/Knockmeane Townland, Athleague, Co. Roscommon.	19/01/2005	19 km	Connected
Sliabh (or Slieve) Bawn Wind Farm 10/507 (ABP Ref. 20.239743)	10-year planning permission for development of 20 turbine wind farm, ESB sub-station, water borehole, effluent treatment plant, meteorological mast, communications mast, site roads, borrow pit and associated site works. The planning permission permitted an operational period of 25 years from the date of commissioning of the wind farm. SEAI wind Atlas Data, this wind farm has been connected since December 2016.	21 townlands, Strokestown, Co. Roscommon.	27/03/2012	8km	Connected
Derrane (Roxborough) Wind Farm 11/126 Amended by 18/313 (extended under 21/3006), 18/447 (ABP Ref. 303677),	10-year planning permission for 2 no. wind turbines along with a sub-station. The planning permission permitted an operational period of 25 years from the date of commissioning of the wind farm.	Derrane and Roxborough Townlands, Co. Roscommon	03/01/2012	14.1 km	Contracted

[8] Source: SEAI for 'connected' or 'contracted' Wind Farms; Council planning registers/ABP for 'proposed' wind farms.

Register Reference	Description of Development	Location	Year of Decision	Distance to Proposed Wind Farm site	Status[8]
20/145 (ABP Ref. 307726).					
Derrane (Roxborough) Wind Farm extension 23/60010 (ABP-317459-23)	Permission for the construction of one Enercon E138 Wind Energy Converter and all associated and ancillary works. The planning permission permitted an operational period of 30 years from the date of commissioning of the wind farm.	Derrane and Roxborough, Co. Roscommon	20/06/2024	19.3 km	Proposed
New Wind Farm 23/60142 (ABP-319800-24)	Proposed construction of wind turbine with a 30-year lifespan with all associated site works.	Kilcash, Roscommon, Co. Roscomnon	Undecided	17.0 km	Proposed
Single turbine 11/4099	Planning permission for a wind turbine to be constructed on an existing agricultural farm and all associated ancillary site works.	Glasson, Athlone, Co. Westmeath.	14/02/2012	15 km	Connected
New Wind Farm ABP Ref. 313750	Permission for a 20-turbine wind farm development and associated ancillary site works.	Cuilleenoolagh and other townlands, Co. Roscommon.	23/11/2023	Approximately 21 km	Proposed

5.5 OTHER DEVELOPMENT WITHIN 10 KM

A review of the Longford County Council, Roscommon County Council, and An Bord Pleanála (ABP) planning registers and Uisce Eireann and Transport Infrastructure Ireland (TII) projects search was conducted within a 10 km study area (based on potential for furthest reaching impacts in relation to the proposed wind farm site) to establish existing and approved projects to be considered cumulatively with the proposed wind farm site including renewable energy developments.

Development considered to have potential cumulative effects with the proposed wind farm site includes any electricity infrastructure, quarries, wastewater treatment plants, piggeries, power plants, biomass developments and any other large developments. A list of select approved projects based on the above-mentioned development types is included in Table 5-3 below. A full list of permissions, including ones that relate primarily to residential development of over 5 no. units, agricultural buildings, piggeries, telecommunications masts, and other public infrastructure, etc., are included in Appendix 5-1 of this chapter.

This planning search was conducted for the period between January 2015 to January 2025 on the basis that permission is typically valid for 5 years, and strategic infrastructure development or other largescale development can hold permission for 10 years.

Table 5-3: Select Planning Applications within 10 km

Local Authority (LA)	LA Ref.	ABP Ref	Description	Address	Grant Date
Electrical					
Longford County Council	18139		Permission for development at the existing Cloon to Lanesboro 110 kV Overhead Line approximately 65 km long.	Aghamore (Rathcline By), Co. Longford.	27/09/2018
Longford County Council	18180		Permission for an MV Substation, transformer and ancillary works to rear (south).	Unit 12 Mastertech Business Park, Townparks , Athlone Road	19/11/2018
Longford County Council	19201		Permission for redevelopment of the existing Lanesboro 110kV AIS substation with a new 110 kV Gas Insulated Switchgear (GIS) substation.	Aghamore, Lanesborough, Longford	01/07/2020
Longford County Council	22223		Permission for the construction of a stationary battery energy storage facility which includes forty 20 ft containers and eight medium voltage transformers and all associated site and development works.	Fisherstown Innovation Park, Cloondara , Co Longford	06/03/2023

Longford County Council	22275		Permission for an underground electrical cable and transformer compound which will connect permitted solar farms within the townlands of Middleton, Ballycore, Treanboy, Newtown, Ballynakill, Bunacloy to the national grid via the proposed transformer compound at Lough Ree Power Station.	Kilnacarrow Ballynakill Cloonkeel Derryaroge Cloonbearla Mount Davys Cloonbony Aghamore, Lanesborough , Co Longford	19/05/2023
Roscommon County Council	23342		Permission for works to uprate the existing Lanesboro - Sliabh Bawn 100 kV overhead line (OHL).	Sliabh Bawn, Co Roscommon	10/11/2023
Longford County Council	2360108		Permission for the replacement of the existing overhead line circuit conductor wires with a new higher capacity conductor including installation of a new fibre communication connection.	Lanesborough Town, and Aghamore Townland , County Longford	27/10/2023
Longford County Council	2360124		Permission for the replacement (“restringing”) of the existing overhead line circuit conductor wires with a new higher capacity conductor including installation of a new fibre communication connection.	Lanesborough Aghamore Knock Gorteengar Tullyvrane Lehery Magheraveen Cloonfore Derrygeel Derryshannoge Derraghan More Derraghan Beg Derryad Derrylough Derryweagh Foygh Cornacarta Tirlickeen Lismacmurrogh Lislom Moygh Drinan, Knappoge Barry Agharanag	17/11/2023

Roscommon County Council	18320	302597	Permission for development at the existing Cloon to Lanesboro 110 kV Overhead Line approximately 65 km long.	Ballyleague, Co. Roscommon	22/08/2018
Longford County Council	18157	303611	Permission for the development of a battery energy storage system (BESS), 1 no. single storey electrical substation building and associated infrastructure.	Ballykenny, Co. Longford.	07/06/2019
Roscommon County Council	2460559		Permission for works to uprate approximately 35.7km of the overall 35.82km of the existing Athlone to Lanesboro 110 kV overhead line (OHL) circuit located within the administrative boundary within County Roscommon.	Athlone 110kV substation in the townland of Monksland , Knockrocghery Moher Gardentown Toberreeoge Toberdan Feamore Corraclogh Kilteevan Kellybrook Srah Corboley Curry Cloontogher Derrycarbry Carrigeens Cloonaddra Clonsellan Lisfelim Coolshaghtena Co	Undecided
Longford County Council	2460287		Replacement (“restringing”) and uprating of the conductor on the existing Athlone-Lanesboro 110 kV overhead line circuit, measuring approximately 0.12km in length.	Lanesboro 110 kV substation townlands of Aghamore and Lanesborough, Co. Longford	Undecided

Longford County Council	2460315		Permission for a battery energy storage system (BESS) located within a fenced compound and will (subject to detailed design, commercial and technical considerations) comprise of: 1) Up to 896 no. battery energy storage enclosures, and associated works are proposed.	former Lough Ree Power (LRP) Station , in the townlands of Aghamore and Lanesborough, Lanesborough (Lanesboro) Co. Longford	Undecided
Solar Farms					
Longford County Council	21225		10-year permission for the development of a solar farm and associated works.	Townlands of Ballynakill, Bunacloy and Middleton, near Killashee	20/10/2021
Longford County Council	2460325		A10 Year Planning Permission for a solar farm and energy storage compound and associated works.	Cornacarta Doonacurry Foygh Kilcommock Glebe Ledwithstown and Tirlickeen , Keenagh and Ballymahon , County Longford	Undecided
Longford County Council	18146		Permission for development at the property of the former Atlantic Mills factory. The development will comprise the construction of a solar farm and associated works. Extended by LA Ref. 23/105.	Fisherstown, Clondra , Co. Longford.	02/10/2018

Longford County Council	1747	248470	10-year permission for a solar farm and associated works.	Cleggill, Longford, Co. Longford.	22/03/2018
Longford County Council	19222	305969	A 25-year permission for a solar farm and associated works.	Ballykenny, Co Longford	08/05/2020
Roscommon County Council	1728	248780	10-year permission for a solar farm and associated works.	Creevyquinn, Roscommon, Co. Roscommon.	23/03/2018
Longford County Council	1681	246850	10-year permission for a solar farm and associated works.	Lisnageeragh, Edgeworthstown, Co. Longford.	07/11/2016
Longford County Council	18135		10-year permission for a solar farm and associated works.	Middleton, Ballycore,, Treanboy and Newtown,, near the village of Killashee, Co. Longford	20/09/2018
Roads and Amenity Tracks					

Longford County Council	2460132		Permission for the development of a network of walking and cycling trails on Bord Na Móna lands and all associated works.	Bord Na Móna lands within the townlands of Cloonbony , Kilnacarrow Ballynakill Begnagh Corragarrow , and Cloonmore County Longford	07/01/2025
Roscom-mon County Council	n/a	300493	Permission for the N5 Ballaghaderreen to Scramoge Road Development and associated CPO works.	Ballaghaderreen to Scramoge , Co. Roscommon	16/01/2019
Longford County Council		Part 8 Application No. 88	Mid Shannon Wilderness Park trackways Mid Shannon Wilderness Park Greenway The pro-posals seek to link into and extend the growing network of greenways in Ireland in accordance with national, regional and local policies and objec-tives.	Several townlands within Long-ford and Roscommon.	Undecided
Agriculture					
Longford County Council	16303		Permission to demolish all existing pig/livestock houses and ancillary structures and to construct 3. No. pig houses and 2. No. ancillary manure storage tanks along with associated works.	Ballynakill, Killashee, Co. Long-ford.	16/05/2018

Longford County Council	17250		Permission to construct an Organic Poultry unit with manure storage facility and a five bay storage shed with solid concrete floor, 2 No. meal silos and all ancillary works. Extended by LA Ref. 22/244.	Corrool Fox, Newtowncashel, Co. Longford.	16/10/2018
Longford County Council	16303	249090	Permission for the demolition of pig/livestock houses and ancillary structures and construction of 3 pig houses and 2 ancillary manure storage tanks which require a licence.	Ballynakill, Killashee, Co. Longford.	16/05/2018
Large Residential					
Longford County Council	22189	314886	Permission for the construction of 198 lodges and new facilities and extensions/alterations to buildings and all associated site works.	Longford Forest, Newcastle Road, Newcastle, Ballymahon, Co. Longford	23/11/2023
Longford County Council	-	313318	Permission for the demolition of an existing building on site, construction of 100 no. residential units (50 no. houses, 50 no. apartments) and associated site works.	Bloomfield Park, Bracklin Road, Edgeworthstown, Co. Longford. (www.bloomfieldparkshd.com)	12/09/2023
Westmeath County Council	2360074	318736	Large scale residential development: 10-year permission for 332 residential units along with provision of a creche, car parking, electric vehicle charge points bicycle and bin storage facilities, link	Lands at Ballykeeran and Cornmaddy Townlands, Athlone, Co. Westmeath.	16/04/2024

			road, footpath, open space areas, residential communal open space areas and site development works.		
Westmeath County Council	2360374	319902	Large-scale residential development: Construction of 177 residential units including all associated development works. This development will form part of a larger phase of permitted and proposed development.	Cornamaddy, Athlone, Co. Westmeath.	23/09/2024
Westmeath County Council	-	TA25M.307508	Permission for 426 no. residential units (237 no. houses, 189 no. apartments) creche and associated site works.	Cornamagh, Clonbrusk and Coosan, Athlone, Co. Westmeath.	27/10/2020
Other					
Longford County Council	17320		Permission to increase the capacity of the operational Ash Disposal Facility to allow for the deposition of 130,000 tonnes of dry ash over and above the 550,000 tonnes permitted under Longford County Council Reg. Ref. 01/115; An Bord Pleanála Reg. Ref. PL14.1255.	Derraghan Beg and Derraghan More, Co. Longford	28/03/2018
Longford County Council	19194		Permission for the change of use of part of the former Atlantic Mills factory from a manufacturing facility to a recycling facility to include processing,	Fisherstown, Cloondara, Co Longford	09/06/2020

			recycling & recovery of the following, wood, plastic, cardboard, paper & metal.		
Roscommon County Council	19546		Permission to upgrade of the Tarmonbarry Wastewater Treatment Plant and all associated works.	Tarmonbarry Wastewater Treatment Plant, Ballytoohey Townland , Tarmonbarry	29/01/2020
Longford County Council	20152		Permission to dispose of materials which will be inert materials, soils & subsoil on the lands to which this application relates so as to raise the existing ground level by a maximum of two meters, creation of entrance with access road all associated ancillary works.	Ballyclare, Killashee , Co Longford	29/09/2020
Roscommon County Council	21417		PART 8 – Permission for the provision of Public Realm Enhancement Scheme which includes the redesign the existing carriageway & paved area along the N5 within the Village to provide a traffic calming effect & improve pedestrian infrastructure & safety.	N5 Termonbarry , Co Roscommon	Approved by Roscommon County Council & the associated works were completed by the Regeneration Department in 2022.
Longford County Council	22225		Permission for an integrated constructed wetland (ICW) over a total area of 5.58 ha and associated works and access roads using onsite soils.	Lough Ree Power (LRP) Ash Disposal facility, Derraghan More & Derraghan Beg, Ballymahon	14/12/2022

Longford County Council	2275	315485	Permission for development at Lough Ree Power (LRP) Station. Demolition of Lough Ree Power Station (previously approved under ABP ref. PL14.125540). Construct and operate electricity grid services consisting of a battery storage system (BESS) and a synchronous condenser (Sync Con) and associated site works.	Aughamore, And Lanesborough, Co Longford	13/10/2023
Westmeath County Council	177177	301078	Permission to construct a maturation warehouse facility and associated ancillary and site development works. Major Accident Directive applies.	Moyvore, Co. Westmeath.	17/12/2018
Roscommon County Council	20310	311614	Permission for development of extensions to the existing quarry and all associated site works.	Cuilrevagh and Largan, Elphin, Castlerea, Co. Roscommon.	15/01/2024
Roscommon County Council	n/a	320468	Request to enter into pre-application consultation pursuant to Section 177E(1A) of Planning and Development Act 2000 (as amended) in relation to substitute consent for quarry activities and permission for future quarry activities.	Feeragh, Ballymurray, Co. Roscommon	Undecided
Longford County Council	n/a	320491	Application for Substitute Consent pursuant to section 177E of the Planning and Development Act 2000 (as amended) for the re-fencing of lands,	Cashel, Newtowncashel, Co. Longford, N39 VH28.	Case is due to be decided by 10/02/2025

			widening of existing entrance gate, commencement of re-surfacing of existing driveway and repairs to harbour.		
Roscommon County Council	n/a	320869	Proposed development of an interim flood relief scheme to pump water from Lough Funshinagh and to discharge the water to the Cross River, within the townland of Carrick, County Roscommon.	Townland of Carrick, County Roscommon	Case is due to be decided by 18/03/2025
ABP	n/a	SU14.322204	Application under s.177E of the Planning and Development Act 2000 (as amended) for Substitute Consent relating to peat extraction on lands within Derrayadd, Derryaroge, and Bannow Bogs, Co. Longford	Derryadd, Derryaroge, and Bannow Bogs, Co.Longford	Case is due to be decided by 05/08/2025

According to the Uisce Eireann Local Projects Interactive Map[9], the following 'planned' and 'in progress' projects are noted:

1. Roscommon Town Sewerage Scheme (Planned)[10]
   - Lough Forbes Water Treatment Plant Upgrade (In Progress)[11]

[9] Uisce Éireann (formerly Irish Water) | Water Utility | Uisce Éireann. Accessed on 16/10/2024.
[10] https://www.water.ie/projects/local-projects/roscommon-town-sewerage-s.
[11] https://www.water.ie/projects/local-projects/lough-forbes-water-treatment-plant-upgrade

There are no Transport Infrastructure Ireland (TII) projects within 10 km of the site as seen from the TII website[12]

5.6 PLANNING AND DEVELOPMENT POLICY CONTEXT

When considering wind as an energy source, it is important to place its development in an international, national, regional and local policy context from the perspectives of environment, energy and planning. This section outlines the legislative mechanisms and requirements from a global to local level, which have been formulated to support the generation of energy from renewable sources and reduce the dependency on fossil fuels and increase in national security.

The Irish planning policy system (Figure 5-1 below) is set within a hierarchical structure. National policy is informed by EU Directives, Planning Legislation, Ministerial Guidelines. Government Policy and Capital programmes.

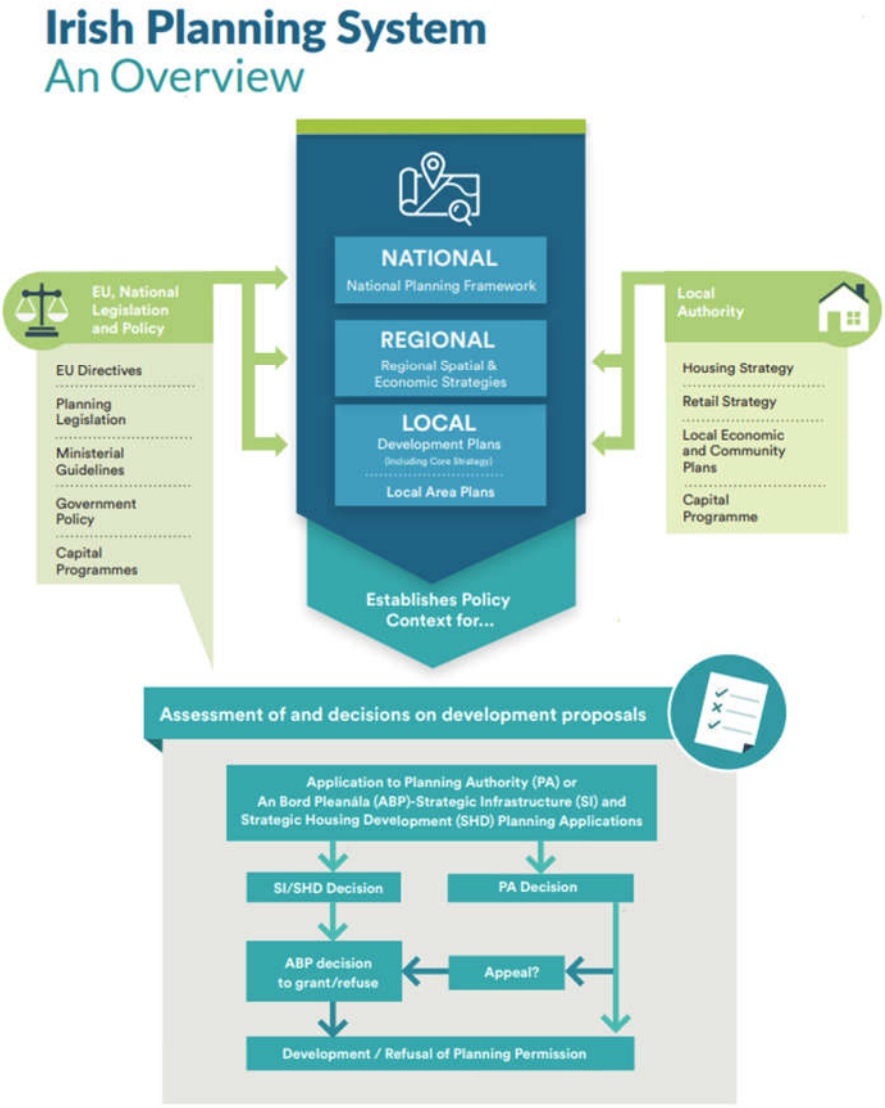

Figure 5-1 The Irish Planning System Overview[13]

[12] Projects - National Transport. Accessed on 16/10/2024.

[13] Project Ireland 2040, National Planning Framework

5.6.1 International Policy Context

5.6.1.1 1992 United Nations Framework Convention on Climate Change

The United Nations Framework Convention on Climate Change (UNFCCC) is an international environmental treaty negotiated at the United Nations Conference on Environment and Development (UNCED), in Rio de Janeiro in 1992. Fifty countries ratified an international treaty, the United Nations Framework Convention on Climate Change (UNFCCC), as a framework for international efforts to combat the challenge posed by climate change. The UNFCCC seeks to limit average global temperature increases and the resulting climate change. In addition, the UNFCCC seeks to cope with impacts that are already inevitable. It recognises that the climate system is a shared resource whose stability can be affected by industrial and other emissions of carbon dioxide and other greenhouse gases.

The framework set no binding limits on greenhouse gas emissions for individual countries and contains no enforcement mechanisms. Instead, the framework outlines how specific international treaties (called "Protocols" or "Agreements") may be negotiated to set binding limits on greenhouse gases. The convention enjoys near universal membership, with 197 countries listed as being Parties to the Convention[14].

5.6.1.2 The Kyoto Protocol Targets

The Kyoto Protocol is an international treaty which extends the 1992 United Nations Framework Convention. The Kyoto Protocol came into effect in 2005, as a result of which, emissions reduction targets agreed by developed countries, including Ireland, are now binding. Under the Kyoto Protocol, the EU agreed to achieve a significant reduction in total greenhouse gas emissions of 8% below 1990 levels in the period 2008 to 2012. Ireland's contribution to the EU commitment for the period 2008 – 2012 was to limit its greenhouse gas emissions to no more than 13% above 1990 levels. Ireland met its Kyoto Protocol targets under the EU burden-sharing agreement.

5.6.1.3 The Doha Amendment to the Kyoto Protocol

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

- New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from 1 January 2013 to 31 December 2020;
- A revised list of greenhouse gases (GHG) to be reported on by parties in the second commitment period; and amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period. During the first commitment period, 37 industrialised countries and the European Community committed to reduce GHG emissions to an average of 5% against 1990 levels. During

[14] https://ec.europa.eu/knowledge4policy/organisation/unfccc-united-nations-framework-convention-climate-change_en

the second commitment period, parties committed to reduce GHG emissions by at least 18% below 1990 levels in the eight-year period from 2013 to 2020; however, the composition of parties in the second commitment period is different from the first.

Under the protocol, countries must meet their targets primarily through national measures, although market-based mechanisms (such as international emissions trading) can also be utilised.

5.6.1.4 The Paris Agreement 2015

This is an agreement within the UNFCCC dealing with greenhouse gas emissions mitigation, adaptation and finance, starting in the year 2020, which aims to keep the global average temperature rise this century to below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius.

In 2016, the threshold for entry into the agreement was adopted and came into force. Ireland is legally bound by Article 7 of the United Nations COP21 Paris Agreement to prepare and submit periodic updates on its national adaptation and mitigation plans in the global effort to keep global warming below 1.5 °C.

The Conference of Parties, more commonly known as COP, is held annually to agree policies for limiting global temperature rises and policies for adapting to impacts associated with climate change.

In 2021, the following agreements were reached by participating parties under COP26:

- Recognition that impacts from climate change will be lower at a temperature increase of 1.5 °C when compared with an increase of 2 °C;
- A request for participating countries to provide stronger national action plans for the year 2022 instead of the original agreed timeline of 2025;
- Agreement for participating nations to phase-down coal power and phase-out inefficient fossil fuel subsidies;
- A reaffirmed commitment by all parties to deliver financial aid to developing countries with a request for this aid to be doubled;
- An agreement on issues contained within the "Paris Rulebook", pertaining to operational details for the practical implementation of the Paris Agreement;
- An acknowledgment that the impacts of climate change are increasing with developing nations especially affected; and
- Agreement to strengthen the Santiago Network for the connection of at-risk countries for the provision of assistance, knowledge and resources.

More recently, COP 28 introduced the first global 'stocktake' which is a process for countries and stakeholders to see where they're collectively making progress towards meeting the goals of the Paris Climate Change Agreement and where they're not. The first global stocktake affirmed that we are not on track to limit global warming to 1.5 degrees Celsius and the window

for meaningful change quickly is closing due to slow progress in reducing greenhouse gas emissions, strengthening climate resilience, and providing financial and technological support to vulnerable nations. Countries decided to accelerate action by 2030, including a call for governments to transition from fossil fuels to renewables like wind and solar power.

5.6.2 European Policy Context

5.6.2.1 Europe 2020: A European strategy for smart, sustainable and inclusive growth

This Communication from the European Commission addresses the issues of sustainable development in the European Union in the light of recent economic challenges. Sustainability is at the heart of this document. This includes the need for the production of clean energy and reduction of greenhouse gas emissions. It notes the savings that this will deliver in terms of reduced oil and gas imports. Objectives include limiting greenhouse gas emissions by 20% or even 30%, providing 20% of energy needs from renewables and increasing energy efficiency by 20% (all compared to 1990 levels). Ireland's objectives are a 20% reduction in non-ETS (Emissions Trading System) emissions by 2020 and a further reduction by 2030 (both relative to 2005 levels) with 40% of electricity from renewable energy resources. Ireland's non-ETS emissions targets are a 20% reduction in emissions by 2020 and a further reduction by 2030 (both relative to 2005 levels) (see *White Paper: Ireland's Transition to a Low Carbon Energy Future 2015-2030, Paragraph 61*).

5.6.2.2 Europe 2030 Climate and Energy Framework

EU leaders agreed in October 2014 on new climate and energy objectives for 2030 following a proposal put forward by the European Commission. The 2030 framework aims to make the EU's economy and energy system more competitive, secure and sustainable.

A centrepiece of the 2030 framework is the binding domestic target to reduce greenhouse gas emissions by 40% below 1990 levels by 2030. This will put the EU on the most cost-effective path towards its agreed objective of an 80-95% reduction by 2050. EU leaders also agreed on raising the share of renewable energy to at least 27%.

As of June 2018, the EU has increased its target of 27% of energy from renewable sources by 2030 to 32% which also includes a clause to allow for a further increase in the target by 2023. In 2023, a renewed target was set via the amended Renewable Energy Directive to 42.5% of energy from renewables but aiming for 45%. This amended target is a clear indication that increased renewable energy remains at the forefront of both EU and national energy policy historically and into the future.

An update to this framework was adopted in July 2021 with a view to 'make the EU's climate, energy, transport and taxation policies fit for reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels.' This was done to enable the EU to move towards a 'climate-neutral' economy.

The grant of permission for the proposed development will directly contribute to Ireland's on-going progression towards its 2030 targets in line with the 2030 Climate Energy Framework.

5.6.2.3 The European Green Deal 2019

The European Green Deal 2019 resets the European Commission's commitment to tackling climate and environmental-related challenges. It is a new growth strategy that aims to transform the EU into a fair and prosperous society, with a modern, resource-efficient and competitive economy where there are no net emissions of greenhouse gases in 2050 and where economic growth is decoupled from resource use. The various elements of the deal are indicated in the infographic below (Figure 5-2):

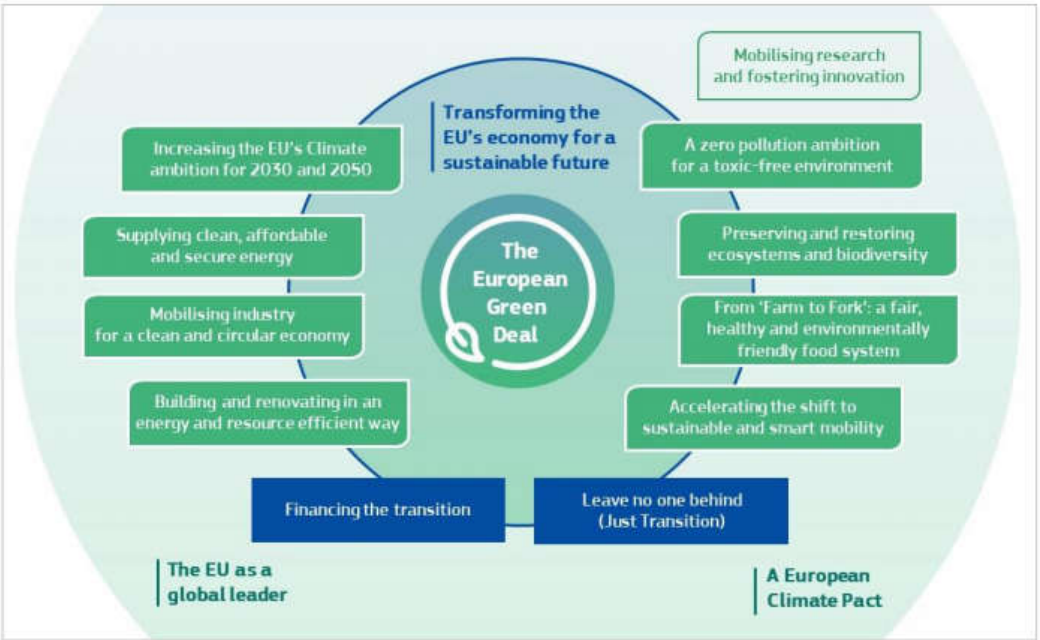

Figure 5-2: Elements of the Green Deal[15]

First climate action initiatives under the Green Deal include:

- European Climate Law to enshrine the 2050 climate-neutrality objective into EU law; and,
- European Climate Pact to engage citizens and all parts of society in climate action.

By summer 2020, the Commission proposed to present an impact assessed plan to increase the EU's greenhouse gas emission reductions target for 2030 to at least 50% and towards 55% compared with 1990 levels in a responsible way. In a speech by the President of the European Commission, Ursula Von der Leyen, on September 8th, 2020, it was confirmed that the EU would increase the reduction target from the 40% in the Europe 2030 and Energy Framework to a new target of 55%. This will put the EU on track for climate neutrality by 2050 and for meeting its Paris Agreement obligations. The Carbon Border Adjustment mechanism will help ensure others will follow Europe's lead.

[15] Source: https://ec.europa.eu/info/sites/info/files/european-green-deal-communication_en.pdf

In July 2021, the European Commission launched the first tranche of its 'Fit for 55' measures that will support Europe's climate policy framework and put the EU on track for a 55% reduction in carbon emissions by 2030, and net-zero emissions by 2050. The interconnected proposals cover areas of climate, land use, energy, transport and taxation to bring them into line with the targets agreed in the European Climate Law. The package is comprised of thirteen proposals; eight of them are revisions to existing laws and five are new proposals:

Revisions:

- Revision to the EU Emission Trading Scheme, to lower the overall emissions cap per economic sector, phase out free emission allowances for aviation, and include shipping for the first time;
- Revision to the Effort Sharing Regulation, assigning stronger reduction targets for each Member State in building, road, domestic maritime transport, agriculture, waste and small industry sectors;
- Revision to the Regulation on Land Use, Land Use Change and Forestry, setting an overall EU target for carbon removals by natural sinks and setting national targets;
- Amendment of the Renewable Energy Directive, setting a new 2030 target of 40% (up from 32%) energy use from renewables by 2030 and strengthening bioenergy sustainability criteria;
- Amendment of the Energy Efficiency Directive setting a more ambitious binding annual target at EU level, raised from 32.5% to 36%;
- Amendment of the regulation setting CO2 emission standards for cars and vans requiring average emissions of new cars to come down by 55% from 2021 to 2030 and net-zero by 2035;
- Revision to the Alternative Fuels Infrastructure Directive to require aircraft and ships have access to clean energy supply in major ports and airports; and
- Revision of the Energy Taxation Directive to align taxation of energy products with climate policies and promote clean technologies.

New initiatives:

- An EU Forest Strategy to improve quality, quantity and resilience of EU forests, ensure sustainable use of biomass, and plant three billion trees by 2030;
- The Carbon Border Adjustment Mechanism to place a carbon price on imports and prevent EU companies being undercut by energy-intensive competitors;
- A Social Climate Fund to help citizens finance investment in energy efficiency, clean mobility and renewable energy;
- The ReFuelEU Aviation Initiative to oblige fuel suppliers to blend more sustainable aviation fuels in jet fuel, including e-fuels; and
- The FuelEU Maritime Initiative to stimulate uptake of sustainable maritime fuels and zero-emission technologies.

The proposed development will support the EU's commitment to tackling climate and environmental-related challenges.

Further proposals and amendments are expected, including a revision of the Energy Performance of Buildings Directive, and new Climate, Energy and Environmental State Aid Guidelines.

5.6.2.4 REPowerEU Plan & Council Regulation (EU) 2022/2577

A REPowerEU Plan was published by the European Commission in 2022 with the purpose of saving energy, producing clean energy and diversifying the supply of energy. The plan was produced in response to Ukraine war to reduce Europe's dependence on Russian fossil fuels.

The Plan contains strategies and measures to phase out the EU's dependency on Russian fossil fuels by the end of the decade by building on the implementation of the European Green Deal and the EU's "Fit for 55" proposals (seeking to cut emissions by at least 55% by 2030). It focuses on diversifying energy sources, accelerating a transition from fossil fuels to clean energy, saving energy, smart investment and reinforcing preparedness.

In support of this plan, Council Regulation (EU) 2022/2577 was adopted on the 22nd of December 2022 to provide a framework to accelerate the deployment of renewable energy.

This regulation has been adopted as a temporary measure for the "fast deployment of renewable energy sources" to "help mitigate the effects of the current energy crises".

One significant measure introduced by the Regulation is the "introduction of a rebuttable presumption that renewable energy projects are of overriding public interest and serving public health and safety for the purposes of the relevant Union environmental legislation, except where there is clear evidence that those projects have major adverse effects on the environment which cannot be mitigated or compensated for".

This regulation indicates the international support for the proposed development as it contributes to the much-needed shift away from fossil fuels to clean energy through the production of clean energy, thereby reducing GHG emissions from the electricity sector and highlights the level of urgency required in the deployment of renewable energy projects.

5.6.2.5 Renewable Energy Directive 2009/28/EC & 2018/2001/EU

Directive 2009/28/EC on the promotion of the use of energy from renewable sources, known as the "Renewable Energy Directive", implements one of the 20-20-20 targets from the EU's 2020 climate and energy framework, which is:

> *"Raising the share of EU energy consumption produced from renewable resources to 20%"*

The Directive sets national binding targets for all EU countries with the overall aim of making renewable energy sources by 2020 account for 20% of EU energy and for 10% of energy specifically in the transport sector (both measured in terms of gross final energy consumption, i.e., total energy consumed from all sources, including renewables). Ireland had a binding national overall target for renewable energy consumption of 16% in 2020.

In December 2018, the recast Renewable Energy Directive 2018/2001/EU entered into force, as part of the Clean energy for all Europeans package, aimed at keeping the EU a global leader in renewables and, more broadly, helping the EU to meet its emissions reduction commitments under the Paris Agreement. The recast directive moved the legal framework to 2030 and set a new binding renewable energy target for the EU for 2030 of at least 32%, with a clause for a possible upwards revision by 2023 and comprised measures for the different sectors to facilitate this target. This included new provisions for enabling self-consumption of renewable energy, an increased 14% target for the share of renewable fuels in transport by 2030 and strengthened criteria for ensuring bioenergy sustainability. The 2019 Green Deal amended the Renewable Energy Directive and set a new 2030 target of 40% (up from 32%) energy use from renewables by 2030 and strengthening bioenergy sustainability criteria.

In 2023, the Directive was further amended to set a current binding renewable energy target of at least 42.5% at EU level, but aiming for 45%, emphasising a growing obligation to renewable energy sources. The proposed development supports the shift towards increased levels of renewable energy production and helps Ireland towards achieving its renewable energy targets as set out in the 2009/28/EC and the revised figure as outlined in the RED III Directive.

5.6.3 National Climate Legislation and Policy Context

This section sets out national climate and energy regulation and policy along with other select environmental policy relevant to the proposed project.

5.6.3.1 Climate Action and Low Carbon Development Act 2015

The relevant EU and international policy and legislation outlined above are transposed into the Irish context through the introduction of the Climate Action and Low Carbon Development Act 2015 (as amended). This Act guides the preparation of Ireland's long term climate action strategies, climate action plans, national climate change adaptation frameworks and carbon budgets which all act as overarching national climate action policies and targets within the State.

This Act provides the statutory basis for the national transition objective set in the national policy position. It commits Ireland to being carbon neutral by 2050 and to also match Ireland's targets with those of the EU. It requires that the Minister for Communications, Climate Action, and the Environment must make and submit to Government a series of successive National Mitigation Plans and National Adaptation Frameworks. While there are no explicit targets set out within the Act itself, the legislation obliges the State to consider any existing obligations of the State under the law of the European Union or any international agreement. In effect the Act formally obliges the State to adhere to EU targets.

5.6.3.2 Climate Action and Low Carbon Development (Amendment) Act, 2021

The purpose of the Climate Action and Low Carbon Development (Amendment) Act, 2021 is to provide for the approval of plans 'for the purpose of pursuing the transition to a climate resilient

and climate neutral economy by the end of the year 2050'. The 2021 Climate Act also 'provides for carbon budgets and a decarbonisation target range for certain sectors of the economy'. The 2021 Climate Act removes any reference to a national mitigation plan and instead refers to both the Climate Action Plan, and a series of National Long Term Climate Action Strategies.

In addition, the local authority shall prepare a 'local authority climate action plan' lasting five years which specifies the mitigation measures and the adaptation measures to be adopted by the local authority. This represents a mandate for Local Authorities to adapt to climate change.

The Act has set a target of a 51% reduction in the total amount of greenhouse gases over the course of the first two carbon periods ending 31 December 2030 relative to 2018 annual emissions. The 2021 Climate Act defines the carbon budget as 'the total amount of greenhouse gas emissions that are permitted during the budget period'.

The Act also outlines duties for certain bodies (which includes consenting authorities) under Article 15 (1) as follows:

> *"A relevant body shall, in so far as practicable, perform its functions in a manner consistent with—*
>
> *(a) the most recent approved climate action plan,*
> *(b) the most recent approved national long term climate action strategy,*
> *(c) the most recent approved national adaptation framework and approved sectoral adaptation plans,*
> *(d) the furtherance of the national climate objective, and*
> *(e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State."*

5.6.3.3 Adopted Paper- Ireland's Transition to a Low Carbon Energy Future 2015-2030

The Government White Paper entitled Ireland's Transition to a Low Carbon Energy Future 2015-2030 sets out a framework to guide Ireland's energy policy development. This White Paper is an update of the 2007 White Paper and sets out a framework to guide policy and actions that the Irish Government intends to take in the energy sector up to 2030 and also reaching out to 2050. The framework was developed in the context of the significant role played by European institutions in determining energy policy, markets and regulation. Similarly, it takes account of European and international climate change objectives, in particular the Renewable Energy Directive.

The Energy Vision 2050 established in the White Paper describes a 'radical transformation' of Ireland's energy system which it is hoped will result in GHG emissions from the energy sector reducing by between 80% and 95%, compared to 1990 levels. This means that the diversification of energy supply during the national transition to a renewable energy system will need to shift away from carbon-intensive fuels such as peat and coal in favour of lower carbon fuels like natural gas.

The White Paper notes that:

> *"Renewable energy will also play a central role in the transition to low carbon energy. No single renewable energy technology – existing or emerging – will alone enable Ireland to overcome the low carbon challenge. Rather, a diverse range of technologies will be required along the supply chains for electricity, heat and transport".*
>
> *"Onshore wind continues to be the main contributor (18.2% of total generation and 81% of RES-E in 2014). It is a proven technology and Ireland's abundant wind resource means that a wind generator in Ireland generates more electricity than similar installations in other countries*".

The White Paper recognizes that the 2020 target of 40% renewables energy was likely to require a total of 3,500-4,000 MW of onshore renewables generation capacity, compared to the 2,500 MW available at the end of December 2014.

5.6.3.4 Project Ireland 2040 - National Planning Framework

Ireland 2040 - National Planning Framework, hereafter referred to as the NPF, published by the Government in February 2018, is a 20-year planning framework designed to guide public and private investment, to create and promote opportunities for Irish citizens, and to protect and enhance Ireland's built and natural environment. The new framework sets out five strategic actions required to achieve this vision:

- Developing a new region-focused strategy for managing growth;
- Linking this to a new 10-year investment plan, the Project Ireland 2040 National Development Plan 2018-2027;
- Using state lands for certain strategic purposes;
- Supporting this with strengthened, more environmentally focused planning at local level; and
- Backing the framework up in law with an Independent Office of the Planning Regulator.

The NPF notes that the population of Ireland is projected to increase by approximately 1 million people by 2040 which will result in a population of roughly 5.7 million. This growth will place further demand on both the built and natural environment as well as the social and economic fabric of the country. In order to strengthen and facilitate more environmentally focused planning at the local level, the NPF states that future planning and development will need to

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

The NPF covers a wide range of national policy objectives and National Strategic Outcomes (NSO). The key outcome provided for under NSO 8 is 'the transition our society to a low carbon

and more climate resilient society'. The NSO states that 'new energy systems and transmission grids will be necessary for a more distributed, more renewables focused energy generation system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy'.

The NSO states that 'diversification of our energy production systems away from fossil fuels and towards green energy such as wind, wave, solar and biomass, together with smart energy systems and the conversion of the built environment into both generator/consumer of energy and the electrification of transport fleets will require the progressive and strategic development of a different form of energy grid'.

However, those most relevant in the overall context of wind energy development are listed in table 5-4 below:

Table 5-4: National Planning Objectives (NPO)

National Policy Objective	Description
NPO 23	Facilitate the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture, energy and extractive industries, the bioeconomy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism.
NPO 54	Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.
NPO 55	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.
NPO 59	Enhance the conservation status and improve the management of protected areas and protected species by: Implementing relevant EU Directives to protect Ireland's environment and wildlife; Integrating policies and objectives for the protection and restoration of biodiversity in statutory development plans; Developing and utilizing licensing and consent systems to facilitate sustainable activities within Natura 2000 sites; continued research, survey programs and monitoring of habitats and species.

NPO 60	Conserve and enhance the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance.
NPO 65	Promote the pro-active management of noise where it is likely to have significant adverse effects on health and quality of life and support the aims of the Environmental Noise Regulations through national planning guidance and Noise Action Plans.

In summary the key steps indicated for delivering on a low carbon society are as follows:

- Delivery of 40% of our electricity needs from renewable sources by 2020 with a strategic aim to increase renewable deployment in line with EU targets and national policy objectives out to 2030 and beyond;
- Reinforce the distribution network and transmission network to facilitate planned growth;
- Strengthen energy security ad resilience to support an island population of 8 million people;
- Consideration of carbon neutral electricity generation that would be facilitated through harnessing carbon capture and storage;
- Interconnectors offer the opportunity to connect to the EU Grid system; and
- Roll out National Smart Grid Plan.

Planning legislation provides for the Government to revise or replace the NPF every six years. An updated revised draft of the NPF was published in November 2024. A final revised NPF is yet to be approved.

The draft revised NPF retains the original NPF focus on a more balanced distribution of growth across all of Ireland's regions and emphasising the potential for regional growth to harness the attractiveness and assets of all regions and places to a greater extent than ever before.

The revised NPF amends the previous National Strategic Outcome 8 (which outlines the key steps to 'transition to a low carbon and climate resilient society') to reflect the updated legally binding renewable energy and greenhouse gas emissions targets.

Additionally, Chapter 9.2 of the revised draft NPF sets out Regional Renewable Electricity Capacity Allocations as set out in Figure 5-3 below. The proposed development is located within the Eastern and Midland region for which 1,966 MW has been identified as an additional renewable power capacity allocation, which in the year 2030, would amount to 25% of the total national share.

Region	Energised capacity 2023 (MW)	Additional Renewable Power Capacity Allocations (MW)	Total % of National Share in 2030	Energised Capacity 2023 (MW)	Additional Renewable Power Capacity Allocations (MW)	Total % of National Share in 2030
	Onshore Wind			Solar PV		
Eastern and Midlands	284	1,966	25%	306	3,294	45%
Northern and Western	1,761	1,389	35%	0.3	959	12%
Southern	2,622	978	40%	138	3,302	43%
Total	**4,667**	**4,333**		**445**	**7,555**	

Figure 5-3: Regional Renewable Energy Capacity Allocations set out under the draft Revised NPF

5.6.3.5 National Development Plan 2021-2030

The National Development Plan 2021-2030, hereafter referred to as the NDP, sets out the investment priorities at national, regional and local planning levels that will facilitate the implementation of the NPF.

In the context of the energy sector, the principle objective of the NDP is to assist in ensuring a 'long-term, sustainable and competitive energy future for Ireland'. Targeted investment within regulated network infrastructure ensures that Ireland's power grid is:

- Maintained to the highest international safety standards;
- Fit for purpose in the medium to longer-term in order to meet projected demand levels; and meets the challenge of integrating world-leading levels of renewable energy;
- The NDP recognises that the national objective of transitioning by 2050 to a competitive low-carbon, climate resilient, and environmentally sustainable economy and society must influence public capital investment choices over the next 10 years. It acknowledges that Ireland's energy system requires a radical overhaul to achieve its energy and climate objectives by 2050. This means how energy in Ireland is generated and used needs to fundamentally change; and
- The NDP states that investment in renewable energy sources, ongoing capacity renewal, and future technology affords Ireland the opportunity to comprehensively decarbonise our energy generation. Renewable energy, including wind technology, will play a key role in helping to diversify away from a reliance on fossil fuels.

5.6.3.6 National Energy and Climate Plan (NECP) 2021-2030

The NECP was prepared in 2019 to incorporate all planned policies and measures that were identified up to the end of 2019 and which collectively deliver a 30% reduction by 2030 in non-

ETS greenhouse gas emissions (from 2005 levels). The NECP recognises the commitment set out under the Climate Action Plan 2021, to reduce CO2 eq. emissions from the sector by 50–55% relative to 2030.

In accordance with the Governance of the Energy Union and Climate Action Regulation, a draft updated National Energy & Climate Plan (NECP) 2021-2030 was submitted to the European Commission in December 2023. It outlines Ireland's energy and climate policies in detail for the period from 2021 to 2030 and looks onwards to 2050. Table 4 of the draft NECP set out the estimated trajectory for the overall share of Renewable energy, which indicated that Ireland's proposed trajectory will not be in line with the desired trajectory. This is primarily due to the fact that large projects, particularly offshore wind projects, cannot be constructed in shorter timeframes and will not be fully operational by the end of the decade.

This draft was further revised to incorporate comments from the Commission, public consultation and updated policies and targets. A final version of the NECP was submitted in July 2024.

5.6.3.7 Climate Action Plan 2024 (CAP24)

The Climate Action Plan 2024 (CAP24) is the third annual update to Ireland's Climate Action Plan and is subject to Strategic Environmental Assessment and Appropriate Assessment. The Plan was approved by Government on 21st May 2024 following the completion of public consultation on Strategic Environmental Assessment.

CAP24 builds upon last year's Plan by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings. The Plan provides a roadmap for taking decisive action to halve Ireland's emissions by 2030 and reach net zero by no later than 2050, as committed to in the Climate Action and Low Carbon Development (Amendment) Act 2021. It sets out the roadmap to deliver on Ireland's climate ambition and aligns with the legally binding economy-wide carbon budgets and sectoral ceilings that were agreed by Government in July 2022.

Six vital high impact sectors are identified, with Powering Renewables identified as being critical to decarbonising the power sector as well as enabling the electrification of other technologies. The Plan seeks to accelerate the delivery of onshore wind by providing up to 9 GW of onshore wind by 2030. CAP24 also acknowledges that some sectors and communities will be more impacted than others with the costs of transition to a low carbon economy. To address this, CAP24 embodies Just Transition principles, and a Just Transition Commission will be established to provide advice to the Government; and retains one of the most important measures of the previous action plan (CAP23) which is to increase the share of electricity demand generated from renewable energy sources to 80% by 2030.

CAP24 notes that in the first half of 2023, 43% of all electricity generated in Ireland came from renewable sources, an increase of 0.9 percentage on the first half of the previous year.

Electricity emissions fell by 1.9% due to an increase in renewable electricity generation, coupled with a reduction in the use of coal, oil and peat generation.

It is recognised that a significant step up is now required to meet 2030 targets and to deliver a decarbonised economy for Ireland by 2050, with key metrics identified as shown in Figure 5-4 below.

Table 12.5 – Key Metrics to Deliver Abatement in Electricity[71]

Theme	2025 KPI	2025 abatement (vs. 2018) $MtCO_2eq.$	2030 KPI	2030 abatement (vs. 2018) $MtCO_2$ eq.	2031-2035 measures
Accelerate Renewable Energy Generation[72]	50% renewable electricity share of demand 6 GW onshore wind capacity Up to 5 GW solar PV capacity, including at least 1 GW of new non-utility solar	2. 21	80% renewable electricity share of demand 9 GW onshore wind capacity At least 5 GW offshore wind capacity 8 GW solar PV capacity, including 2.5 GW of new non-utility solar Green hydrogen production from renewable electricity surplus generation	7.18	Decarbonisation Roadmap for a net-zero power system Green hydrogen production via 2 GW offshore wind
Accelerate Flexibility	Maximum level of renewables at any one time on the grid: 85% Dispatch down (excluding surplus generation) of renewables below 7% Minimise surplus generation Required long term storage (4 hour plus) in place	See above abatement figure	Maximum level of renewables at any one time on the grid: 95-100% Dispatch down (excluding surplus generation) of renewables below 7% Minimise surplus generation Required additional long-term storage (4 hour plus) in place At least 2 GW of new flexible gas-fired generation Zero-emission gas-fired generation from biomethane and hydrogen commencing by 2030	See above abatement figure	Required additional long duration storage technologies in place Increased zero emission gas-fired generation to enable a net zero power system
Demand Management	Demand side flexibility 15-20% Zero carbon demand growth	2.21	Demand side flexibility 20-30% Zero carbon demand growth	7.18	Demand side flexibility 30% Zero carbon demand growth
Total Estimated Abatement Potential					

Figure 5-4: CAP24 Key Metrics to Deliver Abatement in Electricity

Compatibility of the Proposed Development with CAP 24

The proposed development involves the provision of wind turbines on cutaway peatland in the midlands. As such, compliance with CAP 24 policies in relation to renewable energy generation, and rehabilitation of peatlands is demonstrated in the paragraphs below.

Renewable Energy Generation

As outlined in the CAP24 executive summary, the electricity sector has a sectoral emissions ceiling of 40 MtCO2eq. for 2021-2025 which means a 75% reduction in emissions is required by 2030. The electricity sector has a ceiling of 40 MtCO2eq. for the first carbon budgetary period (2021-2025). The Environmental Protection Agency's (EPA) National Inventory Report for 2022 showed that 49% of the first carbon budget had already been used in the first two years of the budget period. Central to maintaining emissions below the ceiling is the strategic increase in the share of renewable electricity to 80% by 2030 which includes ambitious targets of deploying 9 GW of onshore wind. These measures are vital not only for significantly reducing electricity sector emissions but also for enabling the broader electrification of other sectors, thus multiplying the impact on overall emissions reductions.

The electricity sector continues to face an immense challenge in meeting its requirements under the sectoral emissions ceiling, as the decarbonisation of other sectors, including transport, heating, and industry, relies to a significant degree on electrification. CAP24 states that, 'deployment rates of renewable energy and grid infrastructure required to meet the carbon budget programme for electricity is unprecedented and requires urgent action across all actors to align with the national targets'. Additionally, the Climate Change Advisory Council has made a number of recommendations for actions in the electricity sector such as the need to streamline the planning process for wind farms.

Table 5-5: CAP24 Measures to Accelerate Renewable Electricity Generation

CAP24 Measure	Applicant Response
Accelerate the delivery of utility-scale onshore wind, offshore wind, and solar projects through a competitive framework;	Bord na Móna have a track record of delivering utility scale wind and solar projects and currently manage and operate a portfolio of thermal and renewable assets that supply energy to the National Grid including Edenderry Power Plant, a biomass fired generating unit, Cushaling peaking plant, the Drehid landfill gas facility, Bellacorick Wind Farm and Oweninny Wind Farm Phase 1 (a joint venture with ESB) in County Mayo, Mountlucas and Cloncreen Wind Farms in County Offaly and Bruckana Wind Farm, situated on the borders of counties Tipperary, Kilkenny and Laois. The construction of Oweninny Wind Farm (Phase 2) consisting of

	31 turbines, the largest onshore wind farm in Ireland, entered commercial operation in 2023. Timahoe North solar farm located in Co. Kildare became operational in 2024, and Derrinlough Wind Farm, in Offaly under construction near completion at the time of writing. .
Target 6 GW of onshore wind and up to 5 GW of solar by 2025;	The proposed development includes the provision of 22 no. electricity generating wind turbines capable of producing a total output of 132 MW which directly contributes towards achieving the target of 6 GW of onshore wind by 2025. As of December 2024, Ireland's installed onshore wind capacity is just over 4,836 MW according to Wind Energy Ireland data(WEI, Wind Stats (2024)).
Target 9 GW of onshore wind, 8 GW of solar, and at least 5 GW of offshore wind by 2030;	
All new or repowered renewable electricity generation projects shall implement a Community Benefit Fund equivalent to the RESS requirements of €2/MWh;	Bord na Móna is proposing to replicate its proven Community Gain Scheme model (as done for Mountlucas and Bruckana Community gain schemes) for the proposed Derryadd Wind farm. The scheme will be established for the proposed development in accordance with best practice requirements. The fund will be available for the lifetime of the project and will look to support the local community, through funding of projects and services, as required. There will also be the Community Gain and Near Neighbour Schemes, for which the fund will be directly proportional to the installed capacity and energy produced at the site, which based on current schemes, will be in the region of €15 million over the lifetime of the project.

Just Transition in the Midlands

The EU Just Transition Fund is a financial instrument designed to support regions facing socio-economic challenges due to the transition to climate neutrality.

CAP24 states that Exchequer and EU resources are providing continuing support to the Midlands region in addressing the socio-economic impacts following the closure of peat-fired power stations and the cessation of commercial peat extraction as a feedstock for power generation.

There are several priorities identified within CAP 24 to support the EU Just transition fund, such as,

- Priority 1: Generating employment for former peat communities by investing in the diversification of the local economy;
- Priority 2: Supporting the rehabilitation and restoration of degraded peatlands and regeneration and repurposing of industrial heritage assets; and,
- Priority 3: Providing former peat communities with smart and sustainable mobility options to enable them to benefit directly from the green transition.

Bord na Móna supports the Just Transition in the midlands through several key initiatives aimed at ensuring a sustainable and equitable shift from peat-based activities to green and renewable energy projects:

- Employment and Retraining: Bord na Móna ceased peat extraction in 2019 and committed to supporting workers affected by the transition from peat extraction. This included retraining and reskilling programmes to help workers adapt to new roles in green industries.
- Renewable Energy Projects: The company is accelerating the development of renewable energy assets, such as wind and solar farms, which will create new job opportunities and contribute to Ireland's renewable energy targets.
- Community Engagement: The company works closely with local communities, public representatives, and other stakeholders to ensure that the transition is inclusive and benefits the region as a whole. This includes developing public amenities like walking and cycling trails.
- Just Transition Fund: Bord na Móna is a key participant in the Just Transition Fund, which supports projects that create sustainable employment and economic opportunities in the Midland.
- The Enhanced Decommissioning, Rehabilitation and Restoration Scheme (EDRRS) funded by EU's Recovery and Resilience Facility to rehabilitate approximately 33,000 hectares of peatlands across 82 Bord na Móna bogs over five years is the largest bog rehabilitation programme in Ireland's history. It involves extensive engineering and hydrology works. By October 2023, over 15,000 hectares had been rehabilitated, supporting peat-forming habitats and various ecosystems. The scheme aims to protect carbon storage, enhance biodiversity, and contribute to Ireland's carbon neutrality target by 2050, while supporting several jobs and helping peatland communities transition to a net-zero economy.
- There is also the seven-year, €10 million EU LIFE Peatlands and People Project, with a consortium led by Bord na Móna, to ensure, best-practice restoration and rehabilitation of peatlands for the reduction of greenhouse gas (GHGs) and enhancing carbon storage potential; a just transition accelerator programme; Development of a Peoples Discovery Attraction to promote the importance of climate action, focusing on the role of peatlands and behavioural change, with a long-term objective to establish an educational space that cultivates curiosity and climate literacy.

Peatland Rehabilitation

CAP24 indicates that, peatlands cover 21% of our land area, and 64% of our total soil organic carbon stock and that they are the largest store of carbon in the Irish landscape and are a significant component of our drinking water catchments. However, this carbon store is very vulnerable, for example, to drainage and prolonged periods of drought and can contribute to climate change due to the oxidation of peat soil.

As such CAP24 recommends that, the rehabilitation of degraded peatlands to a condition in which they regain their ability to deliver specific ecosystem services has considerable potential for initial mitigation gains and future carbon sequestration. Additional benefits of peatland restoration include positive socio-economic outcomes for the Midlands, increased natural capital, enriched biodiversity, and improved water quality and flood attenuation.

Table 5-6: CAP 24 Measures to ensure sustainable Peatland Rehabilitation

CAP24 Measure	Applicant Response
Restoration of Natura 2000 and Natural Heritage Area (NHA) Sites by the National Parks and Wildlife Service and other schemes such as EU LIFE projects (e.g Wild Atlantic Nature LIFE / Peatlands and People Project). The restoration/rewetting and hydrological management of our protected peatlands, will halt and reduce peat oxidation and carbon loss.	With regards the proposed development, there are no designated SAC's, pNHA or NHA's within the proposed redline boundary.
Continue further research to assess the potential to sequester, store and reduce emissions of carbon through the management, restoration and rehabilitation of peatlands as outlined in the National Peatlands Strategy;	Bord na Móna has actively supported and continues to support research in carbon sequestration, storage and reduction over the last number of years. This support has included financial and human resources as well as access to study sites. Bord na Móna is actively complying with Ireland's National Peatlands Strategy through several key initiatives such as: • Peatland Restoration and Rehabilitation: Bord na Móna has launched a significant Peatland Restoration Plan, which aims to restore and rehabilitate peatlands across Ireland. This plan includes measures to re-wet bogs, block drains, and encourage the growth of native vegetation. • Carbon Storage and Climate Action: The restoration efforts are designed to secure over 100 million tonnes of carbon in the peatlands, helping to reduce carbon emissions and enhance carbon sequestration. This aligns with national climate goals and contributes to Ireland's commitment to becoming carbon-neutral by 2050. • Biodiversity Enhancement: By restoring peatlands, Bord na Móna is also enhancing biodiversity. Over 7,200 Hectares of bog restored to date and on track to reach 8,100 Hectares of bog restored to peat-forming conditions.

	• Community Amenities: Bord na Móna is developing walking trails, parks, and cycleways to allow communities to enjoy the restored peatlands. This promotes public awareness and appreciation of peatland conservation. The proposed wind farm incorporates several kilometres of amenity tracks and parking spaces to improve mobility and recreation within the area. These efforts demonstrate Bord na Móna's commitment to the National Peatlands Strategy and its role in promoting sustainable peatland management.
Upgrade land-use and habitat mapping systems to establish the baseline condition of wetlands and inform the development of best-practice guidelines for wetland management, including the management of degraded sites and peatlands previously exploited for energy peat extraction;	Bord na Móna uses Esri's ArcGIS system to support and optimise its rehabilitation efforts and is currently planning or implementing rehabilitation schemes throughout Ireland using Esri's digital mapping capabilities. This means ecologists can analyse and examine the ground level to identify which rehabilitation measures are most appropriate on different areas of bogland. This enables them to devise specific map-based solutions such as drain-blocking or bunding to optimise hydrological conditions to re-wet peat and restore peatland function[16]. The latest version of this habitat mapping was used to inform the preparation of the wind farm planning application. Separately, there is also the RePEAT project which aims to extract information about the baseline extent of peatlands in Ireland from accurate historic maps (the Bog Commissioner's Maps) from the early 1800s. This data will then be used to accurately locate and identify agricultural areas located on peat soils. This will facilitate national rewetting projects to reduce GHG emissions from these areas[17]. Bord na Móna plays a significant role in the RePEAT project through its extensive experience in peatland management, such as, active involvement in the restoration and rehabilitation of peatlands across Ireland, transitioning from traditional peat extraction to more sustainable practices.
Develop further measures to help rehabilitate exploited and degraded peatlands, including as	The proposed draft Rehabilitation Plans for Lough Bannow, Derryadd and Derryaroge Bogs submitted

[16] https://www.esri-ireland.ie/en-ie/about/news/bord-na-mona
[17] https://sites.google.com/view/project-repeat/home

part of national land-use planning and the new Common Agricultural Policy, while recognising that strategies may need to differ between regions;	with this application (refer Appendix 7-2 of this EIAR) are site specific and propose the most up to date and proven measures to rehabilitate the cutover and cutaway bog at Derryadd Wind Farm site. The draft rehabilitation plans have been prepared by Bord na Móna as part of obligations to carry cutaway bog rehabilitation under condition 10 of the IPC License issued by the Environmental Protection Agency. The key objective of rehabilitation plan is environmental stabilisation. This means developing vegetation and promoting re-establishment of more typical cutaway peatland communities such as Birch woodland, fen habitat and Sphagnum-rich embryonic bog communities. Rehab measures will include drain-blocking and other measures to raise water levels to the surface of the bog, thus encouraging the development of naturally functioning cutaway peatland habitats. Bord na Móna have plans to develop a greenway amenity walking/cycling track along the northern and western boundary of Derryadd Bog and the northern headland at Derryaroge Bog. This greenway and amenity track will form part of a wider proposal led by Longford County Council to develop a project called the Mid-Shannon Wilderness Park. .

5.6.3.8 Renewable Electricity Support Schemes (RESS)

RESS is a Renewable Electricity Support Scheme, which provides financial support to renewable electricity projects in Ireland. It is a pivotal component of the National Energy and Climate Plan and is essential for achieving Ireland's renewable electricity target by 2030, with a primary focus on cost effectiveness, the RESS will deliver a broader range of policy objectives, including:

- An enabling framework for community participation through the provision of pathways and supports for communities to participate in renewable energy projects;
- Increasing technology diversity by broadening the renewable electricity technology mix (the diversity of technologies);
- Delivering an ambitious renewable electricity policy to 2030; and,
- Increasing energy security, energy sustainability and ensuring the cost effectiveness of energy policy.

On 27th February 2020, the Department of Communications, Climate Action and Energy (DCCAE) published the final terms and conditions for the first competition under the Scheme. The RESS will be implemented through a series of renewable electricity competitions, providing a renewable electricity roadmap and indicative timelines and capabilities.

The first RESS auction (RESS 1) was delivered by a number of organisations and agencies, namely the DCCAE, Commission for Regulation of Utilities (CRU) and EirGrid, working together.

RESS 1 took place in August 2020. A total of 114 projects applied to participate, with 82 successful projects.

Following this, the Renewably Electricity Scheme 2 (RESS 2) auction process commenced with qualification for RESS 2 opening in December 2021. The new auction seeks sought to support the implementation of the National Development Plan (NDP) and the Climate Action Plan 2021 (CAP21) to secure new renewable energy targets of 80% renewable electricity by 2030. The scheme is crucial in helping Ireland to meet new climate targets and ambitions.

The final results of the RESS 2 auction were approved by government and have been published on the EirGrid website. The successful projects in RESS 2 represented a potential increase of nearly 20% in Ireland's current renewable energy generation capacity; 2,748 GWh of the 3,772 GWh bids submitted were successful in the auction. This equates to approximately 414 MW of onshore wind and 1,534 MW of solar. These projects will be delivered between 2023 and 2025.

RESS 3 is the third Onshore Renewable Electricity Support Scheme by the Government of Ireland and is a pivotal component of the Programme for Government and the Climate Action Plan 2023. RESS 3 uses a competitive auction process to determine which generators receive support. For projects that are successful in the RESS 3 Auction, this support typically applies for approximately 15 years. As quoted from KPMG insights in the auction,

> *''...contracts were awarded to only three wind farms for a total capacity of 148 MW, and to just under 500 MW of solar. The total annual generation from this capacity is expected to be 934 GWh, which is significantly short of the indicative auction volume of 2,000 – 3,500 GWh targeted by the Department of the Environment, Climate and Communications to meet Ireland's 2030 80% RES-E target."*

Renewable energy projects supported through the RESS scheme are required to provide a community benefit fund for the area local to the proposed project. This is to ensure that communities most effected by the transition to a greener energy system receive the greatest benefit. This is a policy initiative to deliver on CAP21.

The terms of the fund are set out under the RESS Good Practice Principles Handbook for Community Benefit Funds. The handbook is in place to ensure there is a good relationship between the developers and communities to ensure they work together to maximise the benefits of the funds to local communities living in proximity to RESS Projects.

Key stakeholders involved are the community, the developer, the fund committee, and the administrator. Ultimately the developer is responsible for ensuring the fund is compliant with the RESS meaning there are limits. Without the developer there is no project, they play a critical role in delivering on Ireland's objective of fully supporting our economy with clean, green energy. It is within a developer's best interest to work collaboratively with the community and have established good relationships. They are responsible for ensuring the fund is fully compliant with the RESS. The SEAI have been appointed the Funds support, oversight, and compliance body and as such have a key role in supporting the successful delivery of Funds. The

Department has taken the decision to establish a RESS Communities Steering Board for the purpose of providing strategic direction for the ongoing development of this new sector.

The RESS auction (RESS 3) indicates a significant reduction in wind farm developments awarded contracts which relates to a decline in the quantum of wind farm development consented/granted planning permission. This in turn has knock on effects on the local community, since RESS auction projects enable the set-up of a community benefit fund. It also directly affects the nation's ability to meet the 80% target for energy sources from renewables.

The RESS 4 auction which offers support for 15 years, ran this year and closed on 28th of August 2024. The most recent RESS auction indicates a significant reduction in wind farm developments awarded contracts which relates to a decline in the quantum of wind farm development consented. This in turn has knock on effects on the local community, since RESS auction projects enable the set-up of a community benefit fund. It also directly affects the nation's ability to meet the 80% target for energy sources from renewables.

5.6.3.9 Draft Renewable Electricity Policy and Development Framework

The government is in the process of preparing the Renewable Electricity Policy and Development Framework. This document is currently subject to a process of Strategic Environmental Assessment. It will set out policy to facilitate large scale, onshore, renewable electricity developments, work toward a low carbon future, enhance security of supply and facilitate competitiveness. It will identify strategic areas in Ireland for renewable electricity generation. It will provide planning guidance for assessing such proposals, supplementing the guidance contained in the existing Wind Energy Development Guidelines for Planning Authorities, 2006; (see Draft Renewable Electricity Policy and Development Framework: Draft Strategic Environmental Assessment Scoping Report, 2016). The main draft document has not yet been published at the time of writing.

5.6.3.10 National Mitigation Plan July 2017

This first National Mitigation Plan contains measures to reduce the dependence of the Irish economy on carbon emitting energy sources. The document is to be continually updated. Under the Climate Action and Low Carbon Development Act 2015, each National Mitigation Plan must specify the policy measures that Government consider are required to manage greenhouse gas emissions and the removal of emissions at a level that is appropriate for furthering the national transition objective set out in the Act. This work is necessarily ongoing and envisages the Government adopting appropriate mitigation options so as to achieve progressive emissions reductions.

Chapter 3 of the document addresses the electricity generation sector. Between now and 2050, the sector is to move from a fossil fuel-based electricity system to a low carbon power system. This includes increased levels of renewable generation. "*Our electricity system will be one where onshore wind remains a key part of Ireland's generation portfolio out to 2030. Assuming*

more cost competitive technologies do not emerge in this decade, this is likely to remain the position beyond 2030 and possibly out to 2050." (Section 3.1).

5.6.3.11 Long-term Strategy on Greenhouse Gas Emissions Reduction (2024)

Ireland's Long-term Strategy on Greenhouse Gas Emissions Reductions sets out indicative pathways, beyond 2030, towards achieving carbon neutrality for Ireland by 2050. The Strategy provides a pathway to a whole-of-society transformation and serves as a vital link between shorter-term Climate Action Plans and Carbon Budgets and the longer-term objective of the European Climate Law and Ireland's National Climate Objective. In addition, the Strategy is consistent with Climate Action Plan 2024 and Ireland's National Energy and Climate Plan.

The Long-term Strategy covers, with a perspective of at least 30 years:

- total greenhouse gas emission reductions and enhancements of removals by sinks;
- emission reductions and enhancements of removals in individual sectors, including electricity, industry, transport, the heating and cooling and buildings sector (residential and tertiary), agriculture, waste and land use, land-use change and forestry (LULUCF);
- expected progress on transition to a low greenhouse gas emission economy, including greenhouse gas intensity, CO2 intensity of gross domestic product, related estimates of long-term investment, and strategies for related research, development and innovation;
- the expected socio-economic effect of the decarbonisation measures, including aspects related to macro-economic and social development, health risks and benefits and environmental protection; and
- links to other national long-term objectives, planning and other policies and measures, and investment.

Section 8.1 of this report which outlines 'pathways to climate neutrality for the electricity sector' states that, *'accelerating the deployment of wind and solar power is a central pillar of long-term decarbonisation of the electricity system which aligns with Ireland's EU commitment's and support for the RePowerEU Plan.'*

5.6.3.12 Accelerating Renewable Electricity Taskforce Implementation Plan 2024

The establishment of the Accelerating Renewable Electricity (ARE Taskforce) Taskforce Implementation Plan was a key measure of CAP23 with the plan published on the 14th of June 2024. The role of the ARE Taskforce is to identify, coordinate, and prioritise policies required to fast-track and increase deployment of onshore renewable electricity generation and supporting technologies and ensure that barriers to the implementation of those policies are removed or minimised to the greatest extent possible, in order to meet these 2030 KPI targets, set out under CAP23 and 24.

The ARE Taskforce has prepared a programme of work, the ARE Taskforce Implementation Plan, setting out initial objectives and milestones to deliver onshore renewables and supporting infrastructure required to support the 80% renewable electricity target by 2030.

The Implementation Plan is a Taskforce-wide strategy and project plan, setting out a roadmap for activities identified as being required to meet Ireland's 2030 onshore renewables targets (that is, 9 GW of onshore wind and 8 GW of solar PV). The Implementation Plan will be updated periodically, taking into account future iterations of the Climate Action Plan and government policy.

The following objectives set out in the ARE Taskforce Implementation Plan are important to note in the context of the proposed development:

- PLRO01 Ensure the planning code is compliant with RED III;
- PLRO02 Identify, review, and propose solutions within the planning code to the implementation of EU policies aimed at accelerating deployment of onshore renewable electricity projects, including those identified by other working groups, noting that any resolution must ensure compliance with both RE Regulation/Directive and EU environmental assessment Directives; and
- PLRO03 Consider options withing the planning code for improved data collection to assist with planning for renewable energy delivery targets set out in RED III.

5.6.3.13 National Peatlands Strategy 2015 - 2025

A National Peatlands Strategy was published by NPWS in 2016. This Strategy aims to provide a long-term framework within which all of the peatlands within the State can be managed responsibly in order to optimise their social, environmental and economic contribution to the well-being of this and future generations.

In relation to the move away from peat harvesting and a move toward bog rehabilitation and renewable energy, the Strategy notes the following:

- "P24 As part of Ireland's commitment to move towards a cleaner, more carbon efficient economy, means to reduce the dependency on peat as a source of fuel and horticultural compost will be fully explored.";
- "P25 Consideration will be given to how best cut away bogs can contribute to a low carbon economy through their use as sites for renewable energy.";
- "A10 The National Raised Bog SAC Management Plan will provide for the restoration of raised bog SACs"; and
- "P30 Coillte and Bord na Móna as the managers of significant tracts of peatlands on behalf of the Irish people will continue to show leadership in responsible management, rehabilitation and restoration of peatlands."

It is noted that Bord na Móna have already committed and moved away from peat harvesting. The date for this change was targeted as 2030, however in October 2018, Bord na Móna announced its intention to accelerate this strategy stating:

"Decarbonisation is the biggest challenge facing this planet. For Bord na Móna it presents both a serious challenge and a national opportunity. By accelerating the move away from peat into renewable energy, resource recovery, and new businesses we are supporting national policy and seizing the opportunity presented by decarbonisation. Standing still is not an option for Bord na Móna. We are embarking on a transition phase now which will see us become a leading provider

of renewable energy on the Island of Ireland by 2026, a leader in high-value recycling and provider of a range of new low carbon goods and services. Allied to all of this, a key focus of our decarbonisation plan is ensuring that Bord na Móna remains a very significant employer in the Midlands of Ireland for the decades to come."

In January of 2021, Bord na Móna formally ended all peat extraction on its lands, (peat extraction ceased at the proposed development in 2019) marking a key milestone in its transformation into Irelands leading climate solutions company. The company reiterated its commitment to the Brown to Green strategy that involves the transformation of Bord na Móna from a traditional peat business into a climate solutions company. The company is now fully focused on renewable energy generation, recycling and the development of other low carbon enterprises.

5.6.4 National Wind Energy Guidelines

5.6.4.1 Wind Energy Development Guidelines (2006)

In 2006, the Department of the Environment, Heritage and Local Government (DoEHLG) published '*Wind Energy Development Guidelines for Planning Authorities*' under Section 28 of the Planning and Development Act, 2000. The Wind Energy Development Guidelines (WEDG) provide statutory guidance for wind energy development, including consideration of environmental issues, such as noise and shadow flicker, design, siting, spatial extent and scale, cumulative effect and spacing, as well as the layout and height of wind turbines having regard to the landscape and other sensitivities. Planning authorities must have regard to the Guidelines on planning for wind energy through the development plan process and in determining applications for planning permission. The guidelines are intended to ensure a consistency of approach throughout the country in the identification of suitable locations for wind energy projects and in the treatment of planning applications for wind energy developments.

Relevant points include:

- Visual impact is among the more important considerations and advice is given on spatial extent, spacing, cumulative effect, layout and height. There is an emphasis on the distinctiveness of landscapes and their sensitivity to absorbing different types of development;
- Environmental considerations such as the impact on habitats and birds and the need for habitat management. It is noted that designation of an area of natural and cultural heritage does not in itself preclude development, unless it is judged to be such that it would impact on the integrity of such sites and their natural heritage interests;
- The need for information on the underlying geology of the area including a geotechnical assessment of bedrock and slope stability and the risk of bog burst or landslide. Geological consultants should be employed to ensure that sufficient information is submitted; and
- Impacts on human beings such as noise and shadow flicker.

The proposed development is located within lands identified as 'flat peatland' for which further design guidelines have been specified in Appendix 4 of the document.

These 2006 Guidelines have been considered in the preparation of this EIAR.

The government has issued Planning Circular Letter PL 5/2017 and the *"Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change July 2017"*. Local Authorities shall, in preparing development plans, acknowledge and document national policy on renewable energy and indicate how the plan will contribute to realising overall national targets on renewable energy (particularly in any proposal to introduce or vary a mandatory setback distance or distances for wind turbines).

5.6.4.2 Draft Revised Wind Energy Development Guidelines – December 2019

Several public consultations were held since 2013 on the revised 2006 guidelines along with subsequent detailed engagement between relevant departments including at Ministerial level, after which a "preferred draft approach" to inform and advance the conclusion of the review was announced in June 2017. This led to the publication of the Draft Revised Wind Energy Development Guidelines in December 2019 followed by a further consultation period in February 2020.

The revised guidelines primarily focus on addressing a number of key aspects including noise, visual amenity setback, shadow flicker, community consultation obligations, community dividend and grid connections.

The draft guidelines propose the following main changes to the 2006 Guidelines:

- New noise standards;
- Setback distances;
- Automatic shadow flicker control mechanisms;
- Community consultation;
- Community dividend; and
- Grid connections.

These revised guidelines are still under review and until such time as the new guidelines are published, the 2006 guidelines remain the statutory policy guide in relation to all wind energy developments. As demonstrated in the subsequent chapters, the proposed development will not result in any likely significant effects on the environment and is in accordance with the principles of proper planning and sustainable development and has been designed such adheres to both the 2006 guidelines and the draft guidelines as appropriate.

5.6.4.3 Best Practice Guidelines for the Wind Energy Industry (IWEA, 2012)

These guidelines were published in April 2012 as a best practice guide for wind energy developments, replacing the 2008 and 1994 publications of the same title. In the 2012 publication, there is a much greater emphasis on the environmental and community aspects of

development, reflecting increased awareness and the need for a higher level of scoping and wider consultation. It is intended as a '*reference document*' to complement the DoHPCLG's (formerly DoEHLG) own guidelines and its main purpose is to encourage *'responsible and sensitive wind farm development*' that takes into consideration the concerns of local communities, planners and other interested parties. The emphasis is on responsible and sustainable design and environmental practices, external stakeholder relations and good community engagement practices. Issues addressed include:

- Feasibility Study Guidelines;
- Planning and Environmental Legislation;
- Environmental Impact Assessment;
- Wind Farm layout;
- Health and Safety/Construction and Operation; and
- Community Engagement.

The 2012 Irish Wind Energy Association (IWEA) Guidelines were considered in the preparation of this EIAR, with special attention focused on the Environmental Impact Assessment chapters that advise on the impacts of wind farm development (i.e., noise, shadow flicker, ecology, geology, visual and landscape, cultural heritage, hydrology, etc.).

5.6.4.4 Good Neighbour – IWEA Best Practice Principles in Community Engagement & Community Commitment (IWEA, March 2013)

'Good Neighbour – IWEA Best Practice Principles in Community Engagement & Community Commitment' was published by the IWEA in March 2013 as an extension to the IWEA Best Practice in Wind Farm Development (March 2012). The guidelines support the provision of financial contributions by wind farm operators to local communities and have sought to formulate best practice principles for the provision of a community commitment and engagement.

This proposed wind farm development is in line with objectives of community engagement and commitment.

5.6.5 Regional Policy Context

5.6.5.1 Regional Spatial and Economic Strategy (RSES), Eastern and Midland Regional Assembly (EMRA) 2019 – 2031

The Eastern and Midland Regional Assembly (EMRA) agreed to make the Regional Spatial and Economic Strategy (RSES) 2019 – 2031 in June 2019. It is a strategic policy document that provides a spatial, economic and climate action strategy along with a metropolitan plan and investment framework. The forming of the document is primarily informed by 'Project Ireland 2040', a public consultation process, stakeholder engagement, socio-economic profile of the region and a Strategic Environmental Assessment (SEA).

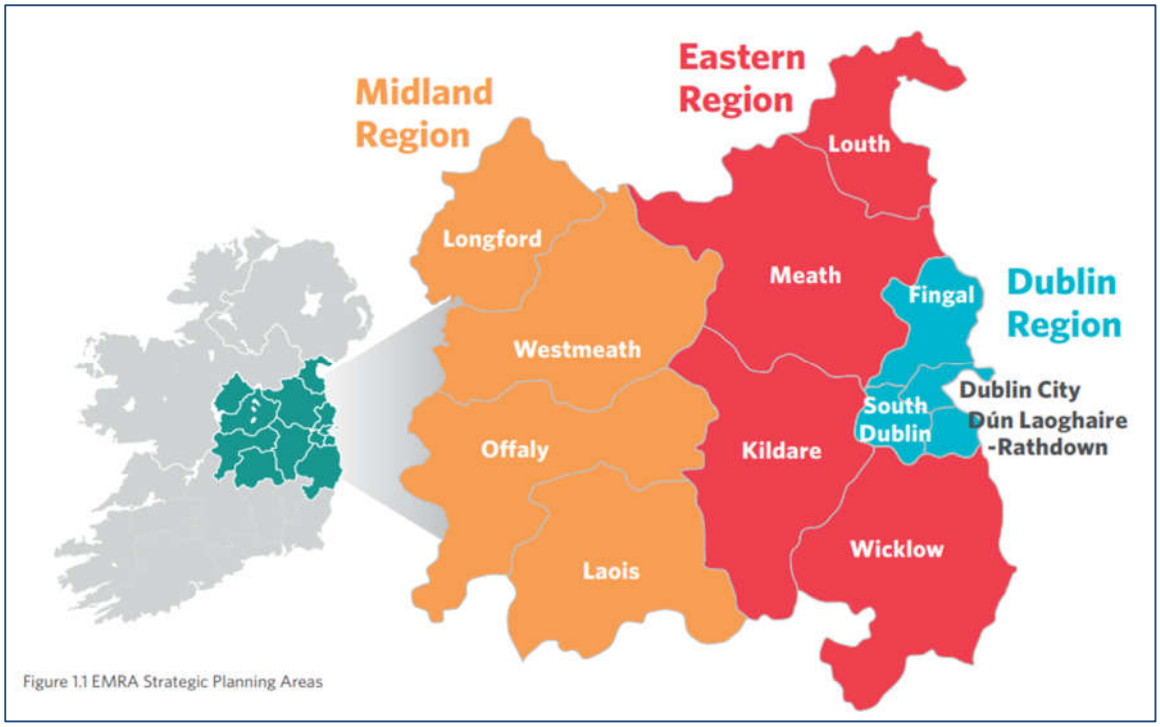

Figure 5-5: EMRA Strategic Planning Areas

The RSES recognises that the renewable energy sector has largely been provided in rural areas and that this pattern is likely to continue, identifying one of the sectoral opportunities in the Midlands region to be in renewable energy. It also recognises the need to decarbonise the energy sector by encouraging a shift from reliance on fossil fuels and natural gas to renewables and other zero carbon sources.

The primary statutory objective of the RSES is to support implementation of the National Planning Framework and National Development Plan. Policies in the RSES which are directly relevant to the proposed wind farm development include:

- **Regional Policy Objective 3.7 –** Local authorities shall have regard to environmental and sustainability considerations for meeting sustainable development targets and climate action commitments, in accordance with the National Adaptation Framework. In order to recognise the potential for impacts on the environment, local authorities shall address the proper site/route selection of any new development and examine environmental constraints including but not limited to biodiversity, flooding, landscape, cultural heritage, material assets, including the capacity of services to serve any new development;
- **Regional Policy Objective 4.8.4 –** Support the rural economy and initiatives in relation to diversification, agri-business, rural tourism, and renewable energy so as to sustain the employment opportunities in rural areas;
- **Regional Policy Objective 6.9** – The Regional Assembly supports the Regional Enterprise Plans to ensure that the Midlands is well positioned to address the challenges posed by the transition to a low carbon economy and renewable energy;

- **Regional Policy Objective 7.35** – EMRA shall, in conjunction with local authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. The Strategic Energy Zones for the Region will ensure all environmental constraints are addressed in the analysis. A regional landscape strategy could be developed to support delivery of projects within the Strategic Energy Zones; and
- **Regional Policy Objective 7.36** – Planning policy at local authority level shall reflect and adhere to the principles and planning guidance set out in Department of Housing, Planning and Local Government publications relating to 'Wind Energy Development' and the DCCAE Code of Practice for Wind Energy Development in Ireland on Guidelines for Community Engagement and any other relevant guidance which may be issued in relation to sustainable energy provisions.

Furthermore, the strategy supports an increase in the amount of new renewable energy sources in the Region. This includes the use of wind energy – both onshore and offshore, biomass, and solar photovoltaics and solar thermal, both on buildings and at a larger scale on appropriate sites in accordance with National policy and the Regional Policy Objectives outlined in this Strategy.

At a regional level, the Regional Spatial & Economic Strategy for the Southern Region, 2020 supports the delivery of the NPF and implementation of the Climate Action Plan. Objective (RPO 99) seeks *"…to support the sustainable development of renewable wind energy (on shore and offshore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines."*

5.6.6 Local Policy Context

5.6.6.1 Longford County Development Plan 2021-2027

The Longford County Development Plan (CDP) 2021-2027 is the land use plan and overall strategy for the proper planning and sustainable development of the functional area of County Longford.

The proposed wind farm site falls in a 'preferred location' for potential wind farms as identified in the Longford County Development Plan 2021 – 2027.

Section 5.8.1.1 of the CDP recognises the potential for renewable energy development stating that *'with a strong history of energy production and an extensive electricity transmission network in place, the potential exists in such peatland areas for a smooth transition to renewable energy sources.'*

Section 5.8 of the CDP sets out the Council policies in the CDP that are directly relevant to the proposed development these policies are listed as follows:

Renewable Energy

- **CPO 5.133** Support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the county and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy, including the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity and gas transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and planning merits:
- **CPO 5.141** Support the identification, in conjunction with EMRA, of Strategic Energy Zones, areas suitable to accommodate large energy generating projects within the Eastern and Midlands Regional area:
- **CPO 5.143** Adopt a 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;
- **CPO 5.144** Have regard to the Renewable Electricity Policy and Development Framework, when adopted, when assessing any renewable energy proposals.
- **CPO 5.145** Promote and support the use of renewable forms of energy as a contribution to the energy demand of all new buildings, where consistent with the proper planning and sustainable development of an area;
- **CPO 5.147** Ensure environmental assessments for new energy developments should address reasonable alternatives for location. Where existing infrastructural assets such as sub-stations, powerlines and roads already exist within 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; and
- **CPO 5.149** The Council shall give consideration to extending the length of the Planning Permission and the life of renewable energy projects on a case-by-case basis given the nature of the proposed development and the type of renewable energy project.

Grid Infrastructure

- **CPO 5.148** Grid connection routing options should be developed to safeguard the strategic function of the national road network in accordance with Government Policy by utilising alternative available routes. The Council requires an assessment of all alternative grid connection routing options to be submitted prior to any proposal being considered for a grid connection utilising the national road network.

Wind Energy

The proposed wind farm development is located within lands zoned 'preferred locations' for wind farm development according to the CDP 'Areas of Wind Farm Potential' Map. Refer to Figure 5.6.

The following CDP policies are relevant to the proposed development:

- **CPO 5.151** Encourage the development of wind energy in suitable locations in an environmentally sustainable manner and in accordance with Government policy and any forthcoming Renewable Energy Strategy for County Longford;
- **CPO 5.153** Ensure that the assessment of wind energy development proposals will have regard to the following:
  - sensitivities of the county's landscapes;
  - visual impact on protected views, prospects, scenic routes, as well as local visual impacts;
- impacts on nature conservation designations, archaeological areas, county geological sites and historic structures, public rights of way and walking routes;
  - local environmental impacts, including those on residential properties, such as noise and shadow flicker;
- visual and environmental impacts of associated development, such as access roads, plant and grid connections;
  - scale, size and layout of the project and any cumulative effects due to other projects; the impact of the proposed development on protected bird and mammal species;
  - County Longford Wind Energy Strategy (when adopted);
  - impact of the grid connection from the proposed wind farm to the ESB network.;
- **CPO 5.154** Ensure that proposals for energy development demonstrate that human health has been considered and has regard to the forthcoming Draft Wind Energy Development Guidelines, including:
  - Noise;
  - Shadow Flicker (for wind turbine developments, including detailed Shadow Flicker Study);
  - Ground Conditions/Geology (including landslide and slope stability risk assessment);
  - Air Quality;
  - Water Quality; and
  - Assessment of impacts on collision risk species (bird and bats).;

Peatlands

- **CPO 5.152** Encourage proposals for commercial wind energy developments to be located on cutaway peatlands in those areas identified as having wind potential within the county, subject to environmental, landscape, habitat and wildlife protection requirements being addressed;
- **CPO 5.156** Ensure wind energy developments sited on peatlands do not increase overall carbon losses. Proposals for such development should demonstrate that the following has been considered:
  - Peatland stability; and
  - Carbon emissions balance.;
- **CPO10.44** Continue to engage with the Waterways Ireland, NPWS, Coillte, ESB, Bord Na Móna and other stakeholders and agencies with regard to tourism related

uses of Lough Ree, forests, cut-away peatlands, restored bogs and related infrastructure and support the development of greenways/peatways and blueways at appropriate locations;

- **CPO12.53** Work with relevant agencies such as the Eastern and Midland Regional Assembly, Bord na Móna, NPWS, Coillte and adjacent local authorities to prepare an after-use framework plan for the peatlands and related infrastructure, to provide for the future sustainable and environmentally sensitive use of large industrial peatlands sites when peat harvesting finished;
- **CPO12.54** Support the National Peatlands Strategy and the implementation of the National Raised Bog Special Area of Conservation Management Plan 2017-2022 and restoration works which will be both a positive conservation measure and help to reduce carbon loss in the County;
- **CPO12.55** Designated, and non-designated peatlands may be subject to the requirements of the planning code, Environmental Impact Assessment Directive (EIA screening and EIA where applicable) and the requirements of the Habitats Directive. Planning permission will be required where the area impacted by works relating to the drainage or reclamation of a wetland exceeds 0.1 hectares or where such works may have a significant effect on the environment. Such planning applications will need to be supported by an Appropriate Assessment and/or Environmental Impact Assessment where necessary;
- **CPO12.57** Support the implementation of any relevant recommendations contained in the National Biodiversity Plan, the All-Ireland Pollinator Plan and the National Peatlands Strategy the National Biodiversity Plan and the Longford Biodiversity Action Plan 2019-2024;
- **CPO14.32** Identify appropriate areas for development;
- **CPO14.33** Develop guidelines for screening and siting measures to facilitate development; and
- **CPO14.34** Seek to identify opportunity to collaborate and/or partner with Bord na Móna.

Other Relevant Policy

- **CPO 6.42** Support the diversification of rural economies to create additional jobs and maximise opportunities in emerging sectors, such as agribusiness, renewable energy, rural tourism and forestry enterprise;
- **CPO 6.91** Work with Gas Networks Ireland, Teagasc, Irish Water, Bord na Móna, Just Transition process, and the private sector to develop and deliver renewable energy solutions;
- **CPO 9.16** Support the rural economy and initiatives in relation to diversification, agri business, rural tourism and renewable energy so as to sustain employment opportunities in rural areas; and
- **CPO12.118** Investigate the potential uses of cutaway bogs in the County for renaturing and amenity and particularly consider the development of sustainable and renewable energy projects.

Development Management Standards

Section 16.4.16 of the CDP outlines specific development management standards which wind farm development will be assessed under, as follows:

- **DMS 16.181** The Council in assessing development proposals will consider the following criteria: In the assessment of renewable energy development proposals such as wind and solar energy schemes (but not limited to), the Council will take the following criteria into account:

a) The proper planning and sustainable development of the area;
b) The environmental and social impacts of the proposed development including those on residential properties, such as noise and shadow flicker;
c) Traffic impacts including details of haul routes;
d) Glint / Glare and the potential impact on the adjoining road networks and dwellings through the submission of an associated report.
e) Impact of the development on the landscape and the Zone of Visual Influence (see Chapter 14: Landscape Character and Annex 11; Landscape Character Assessment);
f) Impact on protected Views and Prospects (see Chapter 14: Landscape Character and Appendix 9 and Annex 11; Landscape Character Assessment);
g) Impact on public rights of way and walking / cycling routes, blueways, greenways and peatways;
h) Impact of the grid connection from the installation to the ESB network and National Grid (where applicable);
i) Mitigation features, where impacts are inevitable;
j) The protection of designated areas - NHAs, SPAs and SACs, areas of archaeological potential and scenic importance, proximity to structures that are listed for protection, national monuments, etc. (see Chapter 11: Built and Cultural Heritage; Chapter 12: Natural Heritage and Environment and Chapter 13: Green Infrastructure);
k) The cumulative Impact of proposal development on protected bird and mammal species;
l) Decommissioning of obsolete infrastructure and after-use.
m) The length and duration of renewable energy projects planning permissions and the life of the project shall be considered on a case-by-case basis and subject to agreement of the Planning Authority; and

- **DMS 16.182** Ensure that proposals for the development of wind farms are not located within areas identified as being within Flood zones A or B as per the Planning System and Flood Risk Management Guidelines 2009 for Planning Authorities (or any updated guidelines). Ensure that proposals for the development of solar farms located within areas identified as being within Flood zones A or B are subject to a Site-Specific Flood Risk Assessment as per the Planning System and Flood Risk Management Guidelines 2009 for Planning Authorities (or any updated guidelines).

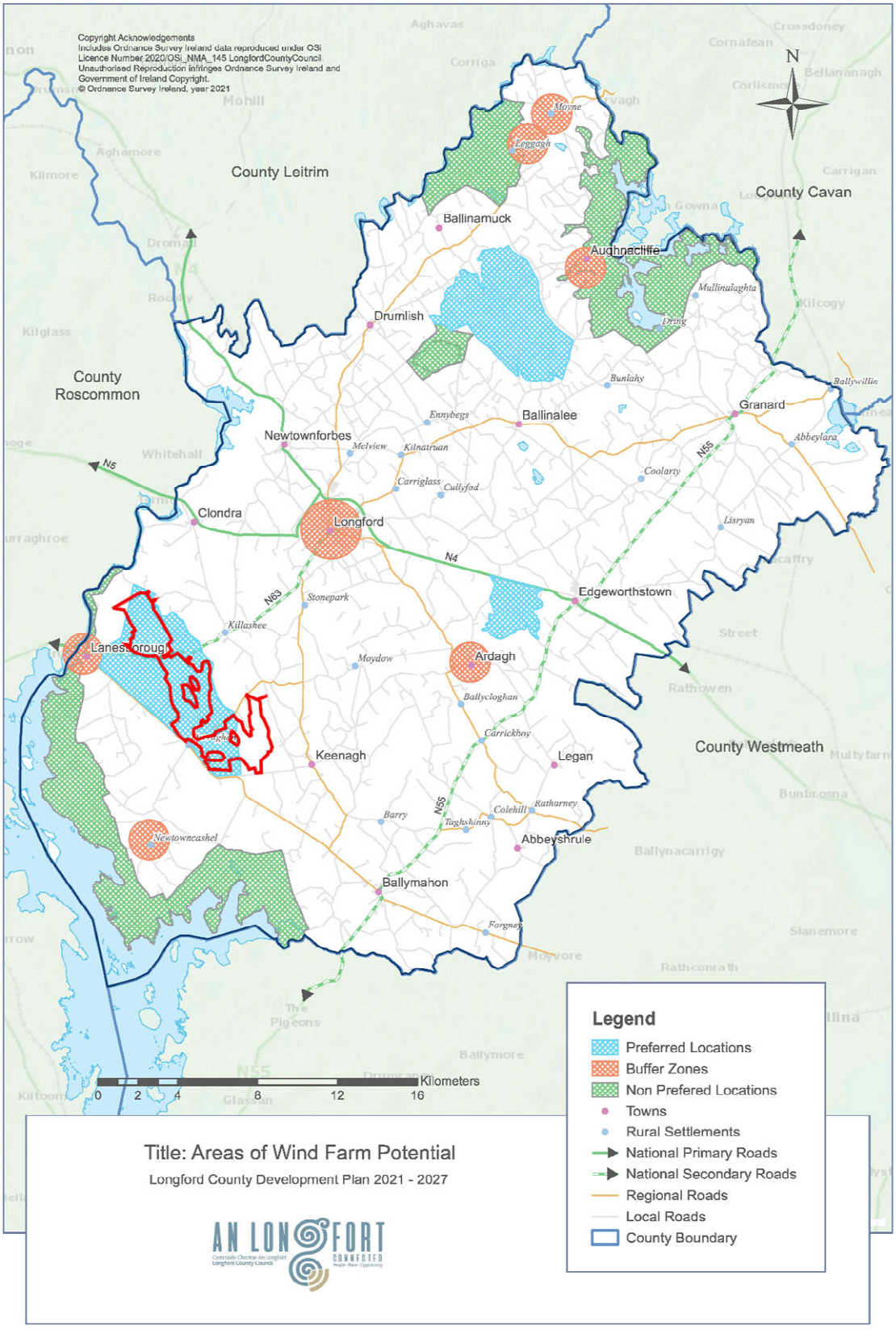

Figure 5-6: CDP Wind Farm Potential Map

5.6.6.2 Adjoining County Development Plans

The Roscommon County Development Plan 2021-2027 recognises that Rural areas have the potential to be harnessed for renewable energy projects, including wind, hydro and solar energy. (Section 5.7). A Renewable Energy Strategy was prepared to accompany this CDP to ensure that the County Roscommon continues to address climate change through facilitating appropriately located renewable energy developments and through supporting energy efficiency in all sectors of the economy.

The Westmeath County Development Plan 2021-2027 notes the need to expand the use of renewable energy sources as a means of fighting global warming and climate change and notes government targets in this regard (Chapter 10). It seeks the development of wind energy sources in the county within the context of proper planning and sustainable development.

The Leitrim County Development Plan 2023-2029 in its Renewable Energy strategy recognises the economic importance of renewable energy and states that 'the uptake of renewable energy technologies offers economic as well as environmental benefits for the local community' and that 'renewable energy adds to the indigenous energy supply in Ireland, improving trade balances and Gross Domestic Product (GDP) by reducing reliance on imports'.

5.6.7 Bord na Móna Policy Context

Since 2019, the proposed wind farm site has been subject to a decommissioning and rehabilitation programme pursuant to the provisions of the IPC License.

5.6.7.1 Bord na Móna Brown Green Strategy Transition

The Brown to Green strategy launched by Bord na Móna in aligns the company with National and EU Decarbonisation policies. It aims to accelerate the development of renewable energy assets to support national climate and energy policy targets as well as accelerating investment in higher-value recycling and resource recovery business.

Key points of the company's decarbonisation plan relating to the proposed wind farm site include:

- Steep increase in the supply of greenhouse-gas neutral biomass replacing peat to the three Midlands power stations; and
- The complete end of using peat for energy brought forward by two years to 2028.

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

5.6.7.2 Bord na Móna's Sustainability 2030 Strategy and Biodiversity Action Plan 2016 -2021

Bord na Móna launched its first Biodiversity Action Plan in 2010 with the aim to set out a strategic plan on how it intended to build on the wealth of peatland management, rehabilitation, restoration and conservation that it has built up since its establishment in the 1940s.

The Bord na Móna Biodiversity Action Plan 2016-2021 builds on the foundation of the original core objectives and the actions set out in the 2010-2015 plan, reframing them in the current context and perspectives of peatland biodiversity management, restoration and conservation and also in the outlook for Bord na Móna as set out in the company's Sustainability 2030 report launched in October 2015.

The key objectives of the Biodiversity Action Plan are to:

- Understand the current baseline ecological condition of Bord na Móna bog areas and the biodiversity present;
- Develop methods to rehabilitate and restore peatland areas in the post-production use phase;
- Engaging with the full range of stakeholders in relation to the management of biodiversity on Bord na Móna bogs and promoting awareness of the importance of biodiversity; and
- Provide a mechanism whereby the delivery and progress of the objective outlined within the Biodiversity Action Plan could be reviewed and assessed annually.

5.7 PLANNING NEED FOR THE PROPOSED DEVELOPMENT

Section 5.6 of this chapter outlines the national policy that clearly drives the need for this type of renewable energy development. Of particular relevance is the Energy White Paper – Ireland's Transition to a low Carbon Energy Future, as well as the target outlined under CAP24. Ireland faces significant challenges to meet its EU targets for renewable energy by 2030 and its commitment to transition to a low carbon economy by 2050. The proposed development is critical to helping Ireland address these challenges as well as addressing the country's over-dependence on imported fossil fuels.

On a regional scale, RPO 4.84 of the RSES recognises the need to *'support the rural economy and initiatives in relation to diversification, agri business, rural tourism and renewable energy so as to sustain the employment opportunities in rural areas'*, and further states that, *'in keeping with the NPF, the Eastern and Midland Regional Assembly will support the longer term strategic planning for industrial peatland areas'*. On a local level, the Longford County Development Plan identifies the location of the proposed development as suitable for wind energy development.

The need for the proposed development is driven by the following factors:

- A legal commitment from Ireland to limit greenhouse gas emissions under the Kyoto protocol to reduce global warming;

- A requirement to increase Ireland's national energy security as set out in Ireland's Transition to a Low Carbon Energy Future 2015-2030 Adopted Paper;
- A requirement to diversify Ireland's energy sources, with a view to achievement of national renewable energy targets and an avoidance of significant fines from the EU (the EU Renewables Directive);
- Provision of cost-effective power production for Ireland which would deliver local benefits;
- Increasing energy price stability in Ireland through reducing an over reliance on imported gas; and,
- The proposed development will also aid in bridging the gap of over 4 GW electricity shortfall in Ireland, in turn contributing towards achieving the CAP24 target of 9 GW of energy to be sourced from onshore wind by 2030. The current installed wind capacity at the end of 2024 is 4.8 GW according to Wind Energy Ireland[18].

The proposed development will produce energy from indigenous renewable resources. As such, it will contribute towards international, EU, national, regional, and local policy regarding the reduction of dependence on fossil fuels, increased reliance on renewable energy and reducing emissions of GHGs. It will contribute towards national policies to increase wind electricity generation capacity in the country and assist in the exploitation of Ireland's renewable energy resources. It will also contribute to meeting the EU's challenging target of at least 42.5% renewable energy by 2030.

In addition, the proposed development is aligned with the objectives of RSES for the Eastern and Midland Regional Assembly (EMRA) i.e., to support the development of secure, reliable and safe supplies of renewable energy via RPOs 7.35, 10.20, and 10.22. Finally, at the local level, the proposed development is in line with and supports the policies of the Longford County Development Plan and is located in an area as a 'Preferred Location', suitable for the erection of large-scale wind farms.

The proposed development also creates an opportunity to generate real tangible benefits for the local community who may not have a direct involvement in the project via the community benefit fund which will be set up following a successful RESS auction. The estimated direct benefit to the local community arising from the combined community benefit and near neighbour schemes is a total of approximately 15 million euro over a 30-year period.

Additionally, the Near Neighbour Scheme will also be implemented on operation of the proposed development offering electricity bill payers living within a prescribed distance of a wind turbine an annual contribution towards their electricity usage. In addition to the electricity contribution payment, this scheme will also offer participants a contribution towards the completion of energy measures on the property and/or education support. This is in line with existing near neighbour schemes that are active at other Bord na Móna operational wind farms.

[18] Source: Latest Wind Energy Statshttps://www.seai.ie/sites/default/files/data-and-insights/seai-statistics/key-publications/renewable-energy-in-ireland/First-Look-Renewable-Energy-in-Ireland-Report.pdf

5.8 CONCLUSION

There are significant International, European, National Regional, and Local policy supports for renewable energy technologies in the Country. In 2023, it was confirmed that Ireland yet again missed its targets for reducing greenhouse gas emissions as per the latest report from the Climate Change Advisory Council – 'Annual Review September 2023' – "Ireland will not meet the targets set in the first and second carbon budget periods unless urgent action is taken immediately, and emissions begin to fall much more rapidly". More recently, the 'Annual Review For All' published in October 2024 states that ''planning processes must ensure that new energy infrastructure is developed to withstand future projected climate impacts.''

2050 European targets mean that Europe's energy production will have to be almost carbon-free by that time, and while Ireland has come a long way in recent years to increase renewable energy generation, the targets are ever increasing. It is this commitment on energy and climate policy that justifies a clear need for renewable energy generation in Ireland. It is recognised that there are a range of renewable resources alternatives that could be explored to meet our International and European commitments however, onshore wind is recognised as being the most economically competitive and viable at this point in time.

Ireland is fortunate to have access to the lowest cost renewable electricity resources in the world. As a small island nation, the challenges are to deliver a secure supply of energy to meet our growing needs and drive economic prosperity, while making sure cost is to the forefront of decision-making, alongside reducing CO_2 emissions to protect the environment and limit the impact of climate change for future generations.

As mentioned previously the Irish government is ramping up its aspirations on renewables, aiming for 80% renewable electricity by 2030. Wind energy provides a clean, sustainable solution to our energy problems. It can be used as an alternative to fossil fuels in generating electricity, without the direct emission of greenhouse gases.

The benefits of wind power are considered to be many, and these can be summarised as follows:[19]

- Wind energy releases no pollution into the air or water;
- Wind energy is both renewable and sustainable. The wind will never run out, unlike the earth's fossil fuel reserves (such as oil and gas);
- Adding wind power to the energy supply diversifies the national energy portfolio and reduces reliance on imported fuels;
- Wind turbines have a relatively small footprint. Although they can tower high above the ground, the impact on the land is minimal. The area around the base of the wind turbine can often be used for other purposes such as amenity and habitat rehabilitation;
- Wind turbines are considered relatively low maintenance. A new wind turbine can be expected to last some time prior to any maintenance work needing to be carried out;
- Local and Economic Benefits. As well as attracting investment into Ireland, wind energy is also contributing to our national growth through paying taxes and is

[19] https://www.esb.ie/tns/education-hub/future-energy/wind-energy

predicted to contribute a tax revenue of €1.8 billion by 203020. Ireland saves money (over €1 billion in the last five years) on wind energy from cutting down on expensive fossil fuel imports; and

- The Energy in Ireland 2023 Report published by the SEAI27 has indicated that wind energy accounted for ca. 85.7% of renewable electricity generated in Ireland in 2022. The CO2 intensity of electricity generation fell to a historic low in 2020, before increasing slightly in 2021 due to an increase in emissions from coal and, to a lesser extent, oil. The CO2 intensity fell again in 2022, due to a decrease in the share of oil and coal in the generation mix.

It is requested that the Planning Authority have regard to the national objectives to support wind energy development as part of the International, European, and National binding agreements to increase the use of renewable energy. The proposed development is compliant with the policies and objectives of the Longford County Development Plan 2021-2027. It also complies with the RSES (EMRA), and the Wind Energy Development Guidelines 2006. The proposed development is cognisant of the Draft Revised Wind Energy Development Guidelines (2019) and the policies and objective of the surrounding county development plans as described above. The proposed development will contribute towards achieving National and EU targets for renewable energy production and CO_2 emission reductions.

The proposed development is also in compliance with CAP24 and its measures adopted for the electricity sector and peatland rehabilitation. Development carried out and proposed by Bord na Mona supports the measures adopted within the plan to accelerate renewable energy generation and also rehabilitate exploited peatland while facilitating 'just transition' within the local communities, via employment creation and community funds. CAP24 also recognises the role of Bord na Móna in rehabilitation of peatlands nationally and achieving carbon sequestration, and the socio-economic benefits associated with these works.

The Climate Action and Low Carbon Development Acts 2015, as amended, has set a target of a 51% reduction in the total amount of greenhouse gases over the course of the first two carbon periods ending 31 December 2030 relative to 2018 annual emissions. The 2021 Climate Bill defines the carbon budget as 'the total amount of greenhouse gas emissions that are permitted during the budget period'.

At a local level, the proposed development is in line with and supports the policies of the Longford County Development Plan 2021-2027 (LCDP) and is predominantly located in a preferred area for such development and will conform to all of the requirements of the planning and design guidelines for wind farms as identified in the Plan.

[20] Wind Energy (esb.ie)

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