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ENERGY SERVICES

## Cush Wind Farm – Phase II

### Renewable Energy Development Planning Statement

Cush Wind Limited

## Document Control

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## **1.0 INTRODUCTION**

### **1.1 PURPOSE OF THIS REPORT**

This Renewable Energy Development Planning Statement has been prepared by Galetech Energy Services (GES), on behalf of Cush Wind Limited ('the Applicant'), to support a planning application for a proposed wind energy development ('the Proposed Development') comprising a 3 no. turbine extension to the permitted 8 no. turbine Cush Wind Farm, located in County Offaly.

Planning permission for Cush Wind Farm was granted by An Coimisiún Pleanála ('the Commission') as Strategic Infrastructure Development (SID) in November 2024 (ref. ABP-318816-24).

The purpose of this Renewable Energy Development Planning Statement is to demonstrate how the Proposed Development accords with the proper planning and sustainable development of the area and to assist Offaly County Council ('the Planning Authority') in its assessment of the planning application.

This Statement examines the Proposed Development in the context of the relevant European, national, regional and local planning policy framework, including policies and objectives relating to renewable energy, climate action and the sustainable use of former industrial peatlands. It also considers the planning history of Cush Wind Farm, the suitability of the site for the proposed extension, and the relationship between the Proposed Development and the planned rehabilitation of Galros Bog. Having regard to these matters and the findings of the accompanying environmental assessments, the Statement sets out the planning justification for the Proposed Development.

This Statement should be read in conjunction with the planning application plans and particulars, the Environmental Impact Assessment Report (EIAR), the Appropriate Assessment (AA) Screening Report and Natura Impact Statement (NIS), and the other technical reports submitted with the application.

### **1.2 THE APPLICANT**

Cush Wind Limited is a special purpose company within the wider Galetech Group established specifically to develop the Cush Wind Farm. Cush Wind Limited was also the applicant for the permitted Cush Wind Farm and is therefore responsible for progressing both the permitted development and the Proposed Development.

The Galetech Group is a group of renewable energy development companies with substantial experience in the development and delivery of renewable energy projects. Further information about the Applicant and the Proposed Development is available at [www.cushwindfarm.ie](http://www.cushwindfarm.ie).

### **1.3 STATEMENT OF AUTHORITY**

This Renewable Energy Development Planning Statement has been prepared by members of Galetech Energy Services, a multidisciplinary renewable energy consultancy that specialises in providing planning, environmental and engineering services for wind energy developments from project feasibility through to delivery and operation.

GES combines the expertise of professionals specialising in wind farm design, planning and environmental assessment and has extensive experience in preparing and coordinating planning applications for wind energy developments, including associated electricity grid and substation infrastructure.

GES also prepared and coordinated the planning application for the permitted Cush Wind Farm and therefore has detailed knowledge of the planning history, design and environmental assessment of that development. For further details of competence and experience, refer to Chapter 1 of the EIAR accompanying the planning application.

## 2.0 LOCATION OF THE PROPOSED DEVELOPMENT SITE

The Proposed Development site is located in rural County Offaly, approximately 4 km north of Birr and approximately 28 km south-west of Tullamore (see **Figure 1**). The proposed wind turbines and principal on-site infrastructure are located in the townlands of Galros East, Whigsborough, Ballycollin, and Eglish.

The local landscape is characteristic of the Irish Midlands and comprises cutaway and modified bog, agricultural grassland, forestry, drainage features and local roads. Part of the site is located within Galros Bog, an area of former industrial peatland historically used for commercial peat extraction.

The surrounding area is predominantly rural in character, with agricultural holdings, dispersed residential properties and a network of local roads. The site is accessible from the local road network, including the L300321, and is located immediately to the east of the N62 national secondary road.

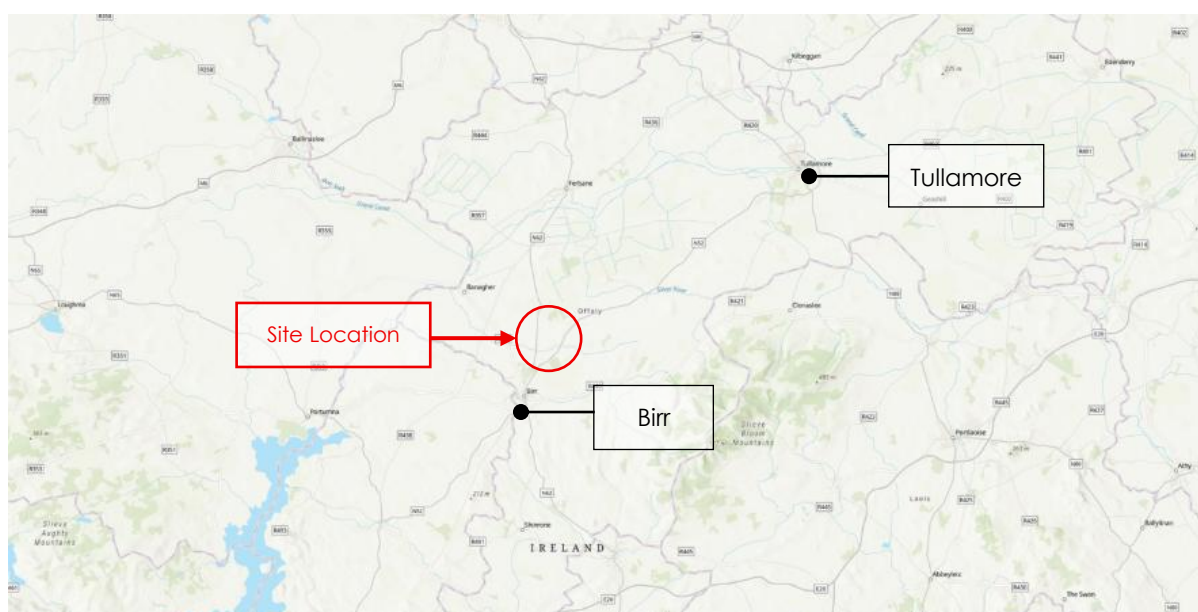


**Figure 1: Proposed Development Site Location**

## 3.0 PLANNING HISTORY

Cush Wind Farm was originally envisaged as an 11 no. turbine development, as reflected in the Pre-Application Consultation (PAC) request submitted to the Commission in 2022 (ref. ABP-313778-22). During the subsequent design process and following further commercial and technical assessments, the Applicant elected to omit the 3 no. northernmost turbines. The planning application was therefore submitted on the basis of an 8 no. turbine layout, with the original EIAR noting that evaluations of the omitted turbine locations were ongoing to facilitate their potential development at a future date, subject to a separate consenting process. These locations now form the Proposed Development.

Planning permission was granted by the Commission for Cush Wind Farm on 4 November 2024 as Strategic Infrastructure Development (SID), comprising 8 no. wind

turbines and associated works (ref. ABP-318816-24). A request under Section 146B of the 2000 Planning Act to alter the terms of this permission was lodged with the Commission on 18 June 2026 (ref. ACP-324405-26). The request seeks to alter the turbine dimensions as described in **Section 6.2** below.

A desktop planning register search of the Proposed Development site and surrounding area was also carried out using the available online planning resources. The search considered existing, permitted and proposed developments within the Proposed Development site and within 1 km of its boundary. Other than the permitted Cush Wind Farm, the search did not identify any other extant planning permissions or current planning applications within the Proposed Development site.

A number of other developments and planning applications were identified in the surrounding area, including residential, agricultural and extractive developments. These have been considered, where relevant, in the cumulative environmental assessment presented in Chapter 1 of the accompanying EIAR.

#### 4.0 HISTORIC PEAT EXTRACTION

The majority of Galros bog was in milled industrial peat production since the 1950s. Industry peat extraction ceased in 2021. The Proposed Development site partially overlaps with lands that were the subject of a previous application by Bord na Móna (BnM) for leave to apply for Substitute Consent in respect of historic peat extraction and ancillary works across the Boora Bog Group, which included Galros Bog (ref. ABP-306246-19). Leave to apply for Substitute Consent was granted on 30 April 2020; however, that decision was quashed by order of the High Court on 7 May 2021. The associated substantive application for substitute consent (ref. ABP-307282-20) was also withdrawn.

Galros Bog forms part of BnM's Environmental Protection Agency (EPA)-licensed industrial peatland operations and is subject to rehabilitation obligations under the applicable Integrated Pollution Control (IPC) licence (ref. P0500-01). Following the cessation of industrial peat extraction, BnM is progressing the rehabilitation of Galros Bog in accordance with these obligations and its Peatlands Climate Action Scheme (PCAS)<sup>1</sup>. In this regard, BnM has prepared the Galros Bog Draft Cutaway Bog Decommissioning and Rehabilitation Plan (2026) which is included at Annex 6.2 of Volume II of the accompanying EIAR.

The Applicant has engaged extensively with BnM and the planned rehabilitation measures have been fully integrated into the design of the Proposed Development, including the layout of infrastructure, drainage design and peat management measures. The interaction between the Proposed Development and the separate rehabilitation works has been assessed in the EIAR, as discussed further in **Section 12.4** below.

The planning history of industrial peat extraction at Galros Bog is distinct from the consideration of the Proposed Development, which constitutes a new Renewable Energy Development requiring assessment on its own planning and environmental merits. The historic peat extraction activities have ceased, and the rehabilitation of Galros Bog is being progressed separately by BnM under its IPC licence obligations.

The Commission has previously granted planning permission for wind energy development on similar former industrial peatlands where peat extraction activities have ceased. Of particular relevance is Ballivor Wind Farm (ref. ABP-316212-23), comprising 26 no. turbines on former industrial peatlands in Counties Meath and

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<sup>1</sup> [www.bnmpcas.ie](http://www.bnmpcas.ie)

Westmeath, for which permission was granted on 22 November 2024. In that case, the Commission's Inspector expressly considered the relationship between the proposed wind farm and historic peat extraction. At Section 8.4.8 of the Inspector's Report, the Inspector considered that the wind farm application could be assessed on its own individual merits, notwithstanding the separate planning history associated with historic peat extraction<sup>2</sup>.

The Ballivor Wind Farm application was also accompanied by environmental assessment documentation which considered the rehabilitation of the former industrial peatlands, including an associated bog rehabilitation plan. The Ballivor Wind Farm decision therefore provides a relevant planning precedent for the assessment of wind energy development on former industrial peatlands as a distinct development from historic peat extraction activities.

Moreover, the Offaly County Development Plan 2021–2027 ('the Offaly CDP') expressly recognises renewable energy development as a potential after-use of former industrial peatlands. In particular, Policies CAEP-16 and BLP-18 support the consideration of renewable energy development alongside peatland rehabilitation and restoration as part of an integrated approach to the future management of cutaway bogs. The Proposed Development is consistent with this policy approach, providing for renewable electricity generation on part of Galros Bog while taking account of BnM's separate rehabilitation obligations and proposals.

## 5.0 DESCRIPTION OF THE PROPOSED DEVELOPMENT

The Applicant seeks planning permission for the Proposed Development, comprising a 3 no. turbine extension to the permitted Cush Wind Farm together with associated infrastructure. The Proposed Development comprises:

- Three (3 no.) wind turbines with an overall ground-to-blade tip height ranging from 199.1 metres to 200 metres, a rotor diameter ranging from 158 metres to 175 metres, and a hub height ranging from 111.6 metres to 120.9 metres;
- Associated turbine foundations, crane hardstanding areas and temporary turbine component storage and assembly areas;
- Approximately 1.7 kilometres of new internal wind farm access tracks;
- An electrical switch room building with a gross floor area of approximately 96.2 square metres, within a compound of approximately 429 square metres, enclosed by approximately 2.6 metre high palisade fencing and gates;
- Underground electrical and communications cabling connecting the proposed turbines to the adjoining permitted Cush Wind Farm (An Coimisiún Pleanála Reference ABP-318816-24) and to the proposed electrical switch room;
- One (1 no.) site entrance from the L300321 local road to serve the electrical switch room;
- Use of the construction phase site entrance from the N62 national road, the operation phase site entrance from the L300321 local road, and the temporary construction compounds permitted as part of Cush Wind Farm;
- All associated and ancillary site development, excavation, construction, landscaping, spoil deposition and reinstatement works, including the provision

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<sup>2</sup> The separate Substitute Consent application relating to the Ballivor Bog Group was subsequently determined on 4 September 2026 (ABP-320487-24).

of site drainage infrastructure and environmental mitigation measures; and

- A 35-year operational life from the date of commissioning of the entire Proposed Development.

The site of the Proposed Development has a total area of approximately 87 hectares (ha).

## 6.0 REGULATORY CONTEXT

### 6.1 PLANNING APPLICATION

The Proposed Development comprises 3 no. wind turbines (numbered T9, T10 and T11) with an estimated combined generating capacity of between 18.3 MW and 21.6 MW. Accordingly, the Proposed Development does not meet the applicable Strategic Infrastructure Development (SID) thresholds as set out in the Seventh Schedule to the 2000 Planning Act (more than 25 no. turbines or a total output greater than 50 MW).

The planning application is therefore being made to Offaly County Council ('the Planning Authority') pursuant to Section 34 of the 2000 Planning Act and the associated provisions of the Planning & Development Regulations 2001 (as amended) ('the 2001 Planning Regulations').

### 6.2 UNCONFIRMED DETAILS

The planning application is also being made pursuant to Section 32H of the 2000 Planning Act, which provides for applications to be made and determined before certain details of a proposed development are confirmed. Following a request by the Applicant, the Planning Authority issued an Opinion on 21 April 2026 (ref. FMR 2602) confirming that it would be appropriate for the application to be made and determined before the final turbine dimensions are confirmed, within the specified ranges. The completed Form No. 22 and the Council's Opinion are provided within the accompanying planning application cover letter. Further details are also provided in the EIAR.

The proposed wind turbines will have the dimensional ranges set out in **Table 1** below.

| Turbine Component | Dimension (m) |         |
|-------------------|---------------|---------|
|                   | Minimum       | Maximum |
| Hub Height        | 111.6         | 120.9   |
| Rotor Diameter    | 158           | 175     |
| Tip Height        | 199.1         | 200     |

**Table 1: Wind Turbine Dimensional Ranges**

As outlined in **Section 3.0** above, a separate request under Section 146B of the 2000 Planning Act has been submitted to An Coimisiún Pleanála to alter the permitted turbine dimensions for Cush Wind Farm (ref. ACP-324405-26). The dimensional ranges sought under that request are identical to those proposed for the 3 no. turbines comprising the Proposed Development.

The proposed turbines have an estimated combined generating capacity of between 18.3 MW and 21.6 MW. Annual electricity generation from the Proposed Development is estimated at approximately 48.3–55.1 gigawatt-hours (GWh), calculated using the corresponding capacity factor for each assessed turbine configuration.

The final turbine model will be selected from within the assessed turbine dimensional ranges. The EIAR assesses the likely significant environmental effects associated with

these dimensional ranges, having regard to the parameters relevant to each environmental topic. The EIAR also assesses the cumulative effects of the Proposed Development in combination with the permitted Cush Wind Farm, including the identical turbine dimensional changes sought under the separate Section 146B request, as well as other relevant existing, permitted and proposed developments.

### 6.3 RENEWABLE ENERGY DIRECTIVE

At European Union (EU) level, Directive (EU) 2023/2413, the third Renewable Energy Directive ('RED III'), aims to accelerate the deployment of renewable energy, including through measures to streamline and expedite permitting procedures. Its relevant planning provisions have been transposed into Irish law by the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. No. 274 of 2025 and S.I. No. 426 of 2025), as subsequently amended by S.I. No. 185 of 2026.

The Department of Housing, Local Government and Heritage has issued Circular CEPP 1/2025 dated 15 August 2025, together with subsequent implementation guidance, addressing the application of these provisions within the Irish planning system<sup>3</sup>. The Proposed Development is a Renewable Energy Development as defined in the Regulations and the relevant planning application procedural provisions therefore apply.

Under Section 34D of the 2000 Planning Act, the Planning Authority must, within 45 days of receiving the application, carry out a 'Completeness Check' and either acknowledge that the application contains the information required to process it or invalidate the planning application and notify the Applicant of any information required to complete the application. Section 34E establishes a 52-week decision period for Renewable Energy Development, commencing from the acknowledgement of completeness and subject to the statutory qualifications contained in that section.

A completed RED III Completeness Checklist is provided within the accompanying planning application cover letter.

### 6.4 ENVIRONMENTAL IMPACT ASSESSMENT

Environmental Impact Assessment (EIA) is a statutory process through which the likely significant effects of a proposed development on the environment are identified, described and assessed before a decision is made on whether to grant planning permission. The process is informed by an Environmental Impact Assessment Report (EIAR) prepared by the Applicant, together with consultation responses and other relevant information.

Schedule 5, Part 2, Class 3(i) of the 2001 Planning Regulations specifies that wind energy developments with more than 5 no. turbines or with a total output greater than 5 MW must be subject to mandatory EIA pursuant to Part X of the 2000 Planning Act.

While the Proposed Development comprises 3 no. turbines, its estimated generating capacity of 18.3 MW to 21.6 MW exceeds the applicable threshold and, accordingly, an EIAR has been prepared and submitted with the planning application.

For the purposes of this Planning Statement, the term 'Proposed Development' refers to the development for which planning permission is sought under the current application, comprising the 3 no. turbine extension to the permitted Cush Wind Farm and its associated infrastructure. The term 'Project', as used in the accompanying

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<sup>3</sup> See also Circular CEPP 2/2025 (26 August 2025), CEPP 3/2025 (16 September 2025), CEPP 4/2025 (3 October 2025), CEPP 1/2026 (16 January 2026) and CEPP 2/2026 (30 April 2026)

EIAR, encompasses a wider scope of works and activities considered necessary to facilitate the construction and operation of the Proposed Development, including the off-site electricity connection infrastructure and turbine delivery route accommodation works that do not form part of the current planning application. These additional elements are included within the EIAR to ensure that the likely significant environmental effects of the Project are assessed cumulatively, notwithstanding that certain elements will be subject to separate future planning consent procedures.

The EIAR also considers the cumulative effects of the Proposed Development in combination with the permitted 8 no. turbine Cush Wind Farm and other relevant existing, permitted and proposed developments, including the separately proposed Mullanafawnia 110 kV substation<sup>4</sup>. Further details of the Project, its constituent elements and the scope of the environmental assessment are provided in the accompanying EIAR.

## **6.5 APPROPRIATE ASSESSMENT**

Appropriate Assessment (AA) is a statutory process for assessing the implications of a proposed development for European sites in view of their conservation objectives. Under Article 6(3) of Council Directive 92/43/EEC ('the Habitats Directive') and Part XAB of the 2000 Planning Act, AA is required where likely significant effects on a European site cannot be excluded, either individually or in combination with other plans or projects.

An AA Screening Report and Natura Impact Statement (NIS) have been prepared and are submitted as standalone documents accompanying the planning application. The Screening Report (Stage 1) identifies that likely significant effects cannot be excluded in respect of several European sites. The NIS (Stage 2) has therefore been prepared to inform the Appropriate Assessment to be undertaken by the Planning Authority.

For the purposes of Appropriate Assessment, the accompanying NIS considers the wider Project, including the Proposed Development and associated off-site electricity connection infrastructure and turbine delivery route accommodation works. This ensures that the potential effects on European sites are assessed comprehensively, notwithstanding that certain elements of the Project will be subject to separate planning consent procedures. Further details are provided in the accompanying AA Screening Report and NIS.

## **6.6 WATER FRAMEWORK DIRECTIVE**

Directive 2000/60/EC ('the Water Framework Directive') establishes a framework for the protection and management of surface waters and groundwater, with objectives including preventing deterioration in the status of water bodies and achieving good water status.

The Proposed Development has been assessed having regard to the requirements of the Water Framework Directive, including the potential for deterioration in the status of surface water and groundwater bodies. A Water Framework Directive Compliance Assessment Report has been prepared and submitted with the planning application. Further details are provided in the accompanying EIAR.

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<sup>4</sup> The proposed Mullanafawnia 110k V substation is currently the subject of Strategic Infrastructure Development Pre-Application Consultation with An Coimisiún Pleanála (Reference: ACP-324608-26). The substation is being proposed by a separate developer and does not form part of the project assessed in this EIAR. However, it is assessed cumulatively, where relevant, in this EIAR.

## 7.0 PRE-PLANNING CONSULTATION

### 7.1 PLANNING AUTHORITY

A pre-planning meeting pursuant to Section 247 of the 2000 Planning Act was held with the Planning Authority on 16 February 2026 (ref. BR2541). The meeting addressed inter alia the Proposed Development and its relationship with the permitted Cush Wind Farm, the emerging layout, associated infrastructure and grid connection arrangements. Matters discussed included the scope of the environmental assessments, cumulative effects, turbine design flexibility, traffic and access, landscape and heritage, the proximity of the Irish Low Frequency Array (I-LOFAR) at Birr Castle, and the need for updated dwelling and receptor mapping to inform the noise and shadow flicker assessments. The application procedure and the relevance of the RED III Directive were also discussed. A record of the meeting is provided in the EIAR.

As described in **Section 6.2** above, a request for an Opinion on unconfirmed details was submitted to the Planning Authority on 13 March 2026 and a meeting was held on 31 March 2026 to discuss these details. The Planning Authority issued its Opinion on 21 April 2026 (ref. FMR 2602), confirming that it would be appropriate for the planning application to be made and determined before the final turbine dimensions were confirmed, subject to those dimensions falling within the identified ranges.

Further correspondence was issued to the Planning Authority on 15 July 2026, providing an update on the Proposed Development and revised grid connection arrangements. On 28 September 2026, additional correspondence was issued enclosing the latest Proposed Development layout and a schedule of the documentation proposed to be submitted with the planning application. Further details of the consultation undertaken with the Planning Authority are provided in the EIAR.

### 7.2 STAKEHOLDER & PRESCRIBED BODY CONSULTATIONS

Relevant prescribed bodies and technical stakeholders were consulted as part of EIAR scoping and topic-specific assessments. Engagement included bodies with functions relating to nature conservation, water, roads, archaeology, aviation, telecommunications and energy infrastructure. Responses received were considered by the relevant environmental specialists in preparing the EIAR and, where appropriate, informed the design of the Proposed Development and associated mitigation measures.

The consultation process involved circulating a Preliminary Scoping Report, accompanied by maps and drawings, to relevant organisations in January 2026 and requesting written feedback. As discussed in **Section 4.0** above, consultation was also undertaken with BnM in relation to the planned rehabilitation of Galros Bog, including technical discussions regarding the relationship between the Proposed Development and the Galros Bog Draft Cutaway Bog Decommissioning and Rehabilitation Plan (2026). Further details of the consultation undertaken, including the responses received, are provided in the EIAR.

### 7.3 PUBLIC CONSULTATION

Consultation with local residents, community groups and elected representatives commenced in February 2022 in respect of the original 11 no. turbine Cush Wind Farm proposal and continued during 2022 and 2023 (see **Section 3.0**). Following the reduction of the original proposal to 8 no. turbines prior to the submission of the planning application to the Commission, consultees were advised that the remaining

3 no. turbine locations continued to be evaluated for potential development through a future planning application, subject to further assessment.

A dedicated consultation programme for the Proposed Development commenced in March 2026, supported by a dedicated Community Liaison Officer. The programme included door-to-door visits, information leaflets, engagement with elected representatives, a public consultation clinic and dedicated website, telephone and email facilities. Local elected representatives were contacted on 18 March 2026 with information on the proposal and contact details for further engagement.

Door-to-door consultation focused on residents within approximately 2 km of the Proposed Development. The project website, [www.cushwindfarm.ie](http://www.cushwindfarm.ie), continues to provide information and updates, supported by a dedicated freephone number and email address.

A public consultation clinic was held at Birr Golf Club on 4 June 2026. Attendees could discuss the proposal individually with the Applicant's team and review draft layout drawings, maps, photomontages and a project presentation.

Community engagement will continue through the planning, construction, operation and decommissioning phases, as appropriate. Arrangements will be maintained for residents to raise queries and receive information on relevant activities associated with the Proposed Development. A detailed account of the consultation undertaken, the issues raised and the project team's responses is provided in the Community Consultation Report accompanying the EIAR.

## **8.0 COMMUNITY BENEFIT FUND**

The Applicant is committed to establishing a Community Benefit Fund at a rate of €2 per megawatt hour (MWh) of electricity generated, in accordance with the recommendations of the Draft Revised Wind Energy Development Guidelines (2019), Wind Energy Ireland's Best Practice Guidelines for the Irish Wind Energy Industry (2012) and the applicable principles of the Renewable Energy Support Scheme (RESS). The annual value of the fund will be linked directly to actual electricity generation.

The fund will be developed in consultation with the local community, allowing funding to target local needs and priorities. Local community groups will be invited to submit funding proposals, including projects delivering social, environmental and sustainability benefits. Unallocated funding will be carried forward, and a transparent record of funded projects will be made publicly available.

The Community Consultation and Stakeholder Engagement Report included in the EIAR also sets out a near-neighbour scheme encompassing both the permitted 8 no. turbine Cush Wind Farm and the 3 no. turbines comprising the Proposed Development. Eligible non-involved households within 1 km will receive annual payments of €2,000, with households between 1 km and 2 km receiving annual payments on a sliding scale between €1,983 and €514. The report identifies 121 no. households as beneficiaries across the combined scheme. These proximity payments will be funded from the Community Benefit Fund.

Further details are provided in the EIAR and accompanying Community Consultation and Stakeholder Engagement Report submitted with the planning application.

## **9.0 POLICY CONTEXT**

The following sections provide an overview of relevant legislation and international, national, regional and local planning policy regarding the delivery of renewable energy developments, the abatement of greenhouse gas emissions and the

achievement of climate change targets. The Proposed Development is assessed against the relevant policy objectives, with particular regard to its contribution to renewable electricity generation and climate action targets.

## **9.1 INTERNATIONAL**

The United Nations Framework Convention on Climate Change (UNFCCC), adopted in 1992, establishes the international framework for addressing climate change. The Paris Agreement, adopted under the UNFCCC in 2015, seeks to limit the increase in global average temperature to well below 2°C above pre-industrial levels, while pursuing efforts to limit the increase to 1.5°C.

The Paris Agreement requires parties to prepare and maintain successive Nationally Determined Contributions (NDCs), setting out their commitments to reducing greenhouse gas emissions. Ireland is a Member State of the EU and contributes to the achievement of the EU's collective NDC, rather than submitting a separate national NDC. The EU's commitments under the Paris Agreement are reflected in its climate and energy legislation, including the European Climate Law and the Renewable Energy Directives, discussed in the following section.

Achieving these commitments requires an urgent step-change in the pace and scale of greenhouse gas emissions reductions, including the accelerated deployment of renewable energy infrastructure to displace fossil fuel-based electricity generation. The Proposed Development will contribute to the achievement of these international climate objectives, and Ireland's contribution to the EU's collective NDC, through the generation of renewable electricity and the associated displacement of fossil fuel-based electricity generation.

## **9.2 EUROPEAN**

### **9.2.1 European Climate Law**

The European Climate Law is the legal cornerstone of the EU's climate strategy. The law, formally adopted as Regulation (EU) 2021/1119, entered into force in July 2021. The purpose of the law was to establish legally binding obligations giving effect to the commitments set out in the European Green Deal.

The central provision is to make climate neutrality by 2050 a legally binding EU-wide target, meaning that the EU, as a whole, must achieve net-zero greenhouse gas emissions by 2050. It also enshrined the intermediate target of a reduction of at least 55% in net greenhouse gas emissions by 2030 compared to 1990 levels, which underpins the 'Fit for 55' package.

More recently, in March 2026, Regulation (EU) 2026/667 of the European Parliament and of the Council was adopted, introducing a new binding intermediate target of a 90% reduction in net greenhouse gas emissions by 2040, compared to 1990 levels. The Regulation provides for a domestic reduction of at least 85%, with the potential for an additional contribution of up to 5% through high-quality international credits. This creates a further milestone in the EU's emissions reduction trajectory – at least 55% by 2030, 90% by 2040, and climate neutrality by 2050.

These increasingly ambitious targets underscore the urgency of accelerating emissions reductions over the coming years and the need for a step-change in the pace and scale of renewable energy deployment, particularly given the lead-in times associated with the planning, consenting and construction of new energy infrastructure. The Proposed Development supports the objectives of the European Climate Law as the renewable electricity generated will contribute to the EU's binding

decarbonisation targets, support Ireland's contribution to the achievement of these collective targets and advance the transition towards a climate-resilient and low-carbon energy system.

### 9.2.2 Renewable Energy Directives

Directive 2009/28/EC (RED I) was adopted in 2009 and subsequently revised in 2018 (RED II) and 2023 (RED III). RED III obliges Member States to collectively ensure that the share of renewable energy in the EU's gross final energy consumption by 2030 is at least 42.5%. The Directive also provides for a collective endeavour to increase this share to 45%.

RED III also establishes a presumption that renewable energy projects are of overriding public interest for specified purposes under European Union (EU) environmental legislation, subject to the applicable conditions. It also introduces measures to accelerate and simplify permitting procedures for renewable energy developments, including specified time limits for the granting of permits. These provisions, as transposed into the Irish statutory context, are discussed in **Section 6.3** above.

The provisions of RED III reflect the critical importance attached at EU level to accelerating renewable energy deployment in order to achieve binding climate and energy objectives. These objectives are reflected in Ireland's National Energy and Climate Plan and subsequent national renewable energy policies, as further discussed below.

The Proposed Development directly supports RED III's 42.5% EU-wide renewable energy share target. By adding domestic renewable electricity generation, it will contribute to increasing the share of renewable energy in Ireland's energy mix, reducing reliance on imported fossil fuels and supporting national renewable electricity targets.

### 9.2.3 European Green Deal & 'Fit for 55' Package

The European Green Deal is the EU's overarching growth and climate strategy, published in December 2019. Its central aim is to transform the EU into a "modern, resource-efficient and competitive economy" while making Europe the first climate-neutral continent by 2050 and decoupling economic growth from resource use. The Green Deal provided the policy basis for the European Climate Law, which established legally binding emissions reduction targets for 2030, 2040 and 2050, as discussed above.

The Green Deal is a wide-ranging strategy spanning multiple policy areas. On climate and energy, it is implemented through the 'Fit for 55' legislative package, introduced in July 2021, which seeks to deliver the EU's target of reducing net greenhouse gas emissions by at least 55% by 2030 compared to 1990 levels. The package includes revisions to the Renewable Energy Directive. The complementary REPowerEU strategy, discussed below, further supports the transition by seeking to strengthen energy security and reduce dependence on imported fossil fuels. Collectively, these measures seek to rapidly accelerate the transition away from fossil fuels, increase renewable energy deployment and improve energy efficiency across the EU.

The Proposed Development, once operational, will support the objectives of the European Green Deal and 'Fit for 55' by generating renewable electricity, contributing to the displacement of fossil fuel-based electricity generation and reducing associated greenhouse gas emissions. It will also contribute to energy security by increasing indigenous renewable electricity generation.

### 9.2.4 National Energy & Climate Plans

Regulation (EU) 2018/1999 on the Governance of the Energy Union and Climate Action requires EU Member States to prepare integrated National Energy and Climate Plans (NECPs), setting out the policies, measures and targets through which they intend to contribute to the EU's climate and energy objectives, including the collective NDC. The NECPs address five dimensions of the Energy Union: decarbonisation, energy efficiency, energy security, the internal energy market, and research, innovation and competitiveness.

Ireland submitted its final updated National Energy and Climate Plan 2021–2030 to the European Commission in July 2024. The Plan consolidates national energy and climate policies, including measures contained in successive Climate Action Plans, and assesses Ireland's projected progress towards its EU obligations. It identifies a national contribution of 43% renewable energy in gross final energy consumption by 2030, reflecting the importance of accelerating renewable energy deployment across the economy. The Plan also incorporates Ireland's national target of generating 80% of electricity from renewable sources by 2030, highlighting the significant expansion of renewable electricity generating capacity required over the remainder of the decade.

The Proposed Development will contribute to the objectives of Ireland's NECP by increasing indigenous renewable electricity generation, supporting the decarbonisation of the electricity sector and strengthening security of energy supply. It will also support Ireland's contribution to the achievement of the EU's collective renewable energy targets. These objectives are further reflected in Ireland's Climate Action Plan 2025, including its targets for renewable electricity generation and installed onshore wind capacity, as discussed in the national policy section below.

### 9.2.5 REPowerEU

REPowerEU is the EU's strategy to end its dependence on Russian fossil fuels and accelerate the clean energy transition. The strategy was launched in May 2022 in direct response to Russia's invasion of Ukraine, which highlighted the EU's dependence on imported fossil fuels and the associated risks to energy security. The strategy builds on the existing 'Fit for 55' and European Green Deal framework rather than replacing it, with a particular emphasis on energy security and supply diversification.

The strategy is built on three main pillars. These pillars comprise energy savings through improved efficiency and reduced consumption; diversification of energy supplies to strengthen security of supply; and accelerated deployment of renewable energy and electrification to reduce dependence on fossil fuels. The third pillar is particularly relevant to the Proposed Development, given its emphasis on increasing indigenous renewable electricity generation.

Council Regulation (EU) 2022/2577, laying down a framework to accelerate the deployment of renewable energy, was adopted in December 2022 as part of the broader REPowerEU response to the energy crisis. The Regulation introduced temporary measures to accelerate renewable energy permitting procedures, recognising the importance of renewable energy deployment to European energy security. These measures informed the subsequent permitting reforms introduced under RED III, as discussed above.

The Proposed Development will support REPowerEU's core objectives of reducing dependence on imported fossil fuels and accelerating the renewable energy transition. By increasing domestic wind energy generation, the Proposed Development will contribute to reducing Ireland's reliance on imported fossil fuels and

strengthening energy security through greater diversification of its electricity generation mix.

### 9.2.6 Nature Restoration Regulation

Regulation (EU) 2024/1991 on Nature Restoration, commonly referred to as the 'Nature Restoration Law', entered into force in August 2024. The Regulation establishes legally binding obligations for Member States to restore degraded ecosystems, enhance biodiversity and contribute to climate change mitigation and adaptation.

The Regulation establishes an EU-wide objective to implement restoration measures covering at least 20% of land areas and 20% of sea areas by 2030, and all ecosystems in need of restoration by 2050. It includes specific provisions relating to the restoration of terrestrial habitats, agricultural ecosystems and drained peatlands, recognising the importance of ecosystem restoration for biodiversity protection and carbon sequestration. The Regulation establishes specific targets for the restoration of drained peatlands under agricultural use, requiring restoration measures on at least 30% by 2030, 40% by 2040 and 50% by 2050, with minimum rewetting requirements. The Regulation also allows the restoration and rewetting of peat extraction sites to contribute towards these targets, subject to specified conditions.

The Regulation also recognises the need to balance nature restoration objectives with the deployment of renewable energy infrastructure. Article 6 provides for a presumption of overriding public interest for renewable energy developments in the context of specified provisions of the Regulation, subject to applicable conditions. The Regulation therefore recognises the importance of addressing biodiversity loss and climate change in a coordinated manner.

Ireland's Draft National Nature Restoration Plan has been prepared in response to the requirements of Nature Restoration Law. The draft Plan, submitted to the European Commission in September 2026, provides a framework for the development of national restoration measures, including measures relating to degraded habitats and peatland ecosystems.

Peatland rehabilitation is particularly relevant to the Proposed Development, given its partial location within Galros Bog. As discussed in **Section 4.0** above, the Proposed Development has been designed having regard to the existing and planned rehabilitation of Galros Bog, which is being undertaken independently by BnM in accordance with its applicable environmental obligations. The Proposed Development has also been designed to minimise potential effects on biodiversity, with mitigation and habitat enhancement measures identified in the accompanying EIAR. The EIAR also considers the cumulative effects of the Proposed Development in combination with the rehabilitation of Galros Bog.

The Proposed Development is therefore considered to be consistent with the wider policy direction established by the Draft National Nature Restoration Plan, subject to the implementation of the environmental mitigation measures identified in the EIAR. In this context, the Proposed Development demonstrates how renewable energy generation can be accommodated within a landscape undergoing peatland rehabilitation, while having regard to the protection and restoration of biodiversity.

## 10.0 NATIONAL

### 10.1 CLIMATE

### 10.1.1 Climate Legislation

The Climate Action and Low Carbon Development (Amendment) Act 2021 ('the 2021 Act') substantially strengthened Ireland's statutory framework for addressing climate change by amending the Climate Action and Low Carbon Development Act 2015 ('the 2015 Act'). The 2021 Act established a legally binding national climate objective requiring the State to pursue and achieve the transition to a climate-resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy by 2050. It also introduced an interim target of reducing greenhouse gas emissions by 51% by 2030, relative to 2018 levels. These statutory objectives give domestic effect to Ireland's climate commitments within the wider European and international policy framework.

The 2021 Act introduced a system of carbon budgets, comprising successive five-year limits on national greenhouse gas emissions. Sectoral emissions ceilings establish corresponding emissions limits for individual sectors of the economy. The Electricity Sectoral Emissions Ceiling is 40 million tonnes of carbon dioxide equivalent (MtCO<sub>2</sub>e) for the period 2021–2025, reducing to 20 MtCO<sub>2</sub>e for 2026–2030. This represents a 50% reduction between the two carbon budget periods, with an associated target of reducing annual electricity sector emissions by 75% by 2030 relative to 2018 levels.

The 2021 Act also requires the Government to prepare and approve a Climate Action Plan annually, setting out the measures required to achieve the national climate objective and comply with the carbon budgets and sectoral emissions ceilings. The legislation also establishes obligations for public bodies, including planning authorities, to perform their functions, insofar as practicable, in a manner consistent with the national climate objective and relevant climate action policies. In *Coolglass Wind Farm Limited v An Coimisiún Pleanála* [2026] IESC 5, the Supreme Court confirmed that the obligations imposed by Section 15 of the 2015 Act (as amended) are substantive and enforceable. These obligations do not override other statutory planning considerations or require planning permission to be granted for renewable energy developments. However, they require planning authorities to exercise their statutory functions, insofar as practicable, in a manner consistent with the climate objectives specified in Section 15.

By generating renewable electricity that will contribute to displacing electricity generated from fossil fuels, the Proposed Development will support the achievement of the electricity sector's emissions reduction objectives and Ireland's transition to a climate-neutral economy. The climate benefits of the Proposed Development are therefore a relevant consideration in the determination of this planning application, consistent with the statutory framework and the Supreme Court's interpretation in *Coolglass*.

### 10.1.2 Climate Action Plan

The Climate Action Plan 2025 (CAP25) sets out the Government's programme of actions to achieve Ireland's legally binding climate objectives, carbon budgets and sectoral emissions ceilings. A central element of the Plan is the decarbonisation of the electricity sector through the accelerated deployment of renewable energy infrastructure, which will also support the electrification and decarbonisation of other sectors of the economy.

CAP25 retains the national objective of generating 80% of Ireland's electricity from renewable sources by 2030, supported by a target of achieving 9 GW of installed onshore wind capacity by the same year. The Plan recognises that the transition from fossil fuels to renewable energy will improve energy security and reduce Ireland's dependence on imported energy. It also emphasises the importance of increasing

renewable electricity generation to accommodate anticipated growth in electricity demand while achieving the required reductions in greenhouse gas emissions. The timely delivery of additional renewable generation capacity is therefore essential to achieving Ireland's climate and energy objectives.

The Proposed Development will provide approximately 18.3–21.6 MW of installed generating capacity and will directly contribute to the national targets of achieving 9 GW of installed onshore wind capacity and 80% renewable electricity generation by 2030. It will also contribute to reducing greenhouse gas emissions from electricity generation and strengthening Ireland's security of energy supply.

CAP25 also identifies the rehabilitation of former industrial peatlands as an important component of Ireland's climate mitigation strategy. In particular, it provides for the rehabilitation of 65,900 ha of exploited peatlands by 2030 and records that BnM had rehabilitated 19,065 ha by January 2025. Peatland rehabilitation contributes to climate objectives by reducing emissions from degraded peat soils, protecting existing carbon stores and supporting the recovery of peatland habitats and biodiversity.

These objectives are relevant to the Proposed Development given its partial location on Galros Bog, where BnM is separately progressing peatland rehabilitation. The Proposed Development has been designed having regard to these works, demonstrating the potential for renewable electricity generation and peatland rehabilitation to contribute to Ireland's climate objectives as complementary activities.

## 10.2 BIODIVERSITY

Ireland's Fourth National Biodiversity Action Plan 2023–2030 ('the National Biodiversity Action Plan') establishes the national policy framework for addressing biodiversity loss and promoting the protection, conservation and restoration of habitats and species. The Plan adopts a whole-of-government and whole-of-society approach, recognising the importance of integrating biodiversity considerations into decision-making across all sectors. It identifies five strategic objectives, including Objective 2, 'Meet Urgent Conservation and Restoration Needs', which seeks to strengthen the protection and restoration of biodiversity and ecosystems across Ireland.

Similar to the Draft National Nature Restoration Plan discussed at **Section 9.2.6** above, the National Biodiversity Action Plan places particular emphasis on the conservation and restoration of peatland habitats, recognising their importance for biodiversity, carbon storage and climate change mitigation. The Plan identifies the degradation of peatland habitats as a significant biodiversity concern and highlights ongoing national initiatives to restore and rehabilitate degraded peatlands. In particular, it recognises the role of BnM's Peatlands Climate Action Scheme in the rehabilitation of former industrial peatlands, including the restoration and rehabilitation of approximately 33,000 ha of previously harvested peatlands.

The Plan also recognises the important role of the planning system in safeguarding biodiversity by ensuring that new development is sustainable and that potential adverse effects on the natural environment are appropriately considered. These considerations are relevant to the assessment of the Proposed Development, particularly given its location within a landscape undergoing peatland rehabilitation.

As outlined in the preceding section, the Proposed Development has been designed having regard to BnM's separate rehabilitation proposals for Galros Bog. From a biodiversity perspective, the principal consideration is whether the Proposed Development can be accommodated without compromising the ecological and hydrological objectives of those rehabilitation works.

The Proposed Development has also been designed to minimise potential effects on biodiversity, with mitigation and habitat enhancement measures identified in the accompanying EIAR. The EIAR assesses potential effects on ecological receptors, including cumulative effects associated with the separate rehabilitation of Galros Bog, and considers the hydrological conditions relevant to its implementation.

The Proposed Development is therefore considered to be consistent with the objectives of the National Biodiversity Action Plan and the wider policy direction established by the Draft National Nature Restoration Plan, subject to the implementation of the environmental mitigation measures identified in the EIAR. In particular, the Proposed Development has been designed and assessed having regard to the protection of biodiversity and the planned rehabilitation of the former industrial peatlands.

## 10.3 PLANNING

### 10.3.1 National Planning Framework

#### *National Strategic Framework and Climate Objectives*

The National Planning Framework (NPF) is Ireland's national 20-year spatial strategy, and its First Revision was formally approved by Government and both Houses of the Oireachtas in April 2025. It revises the original NPF published in 2018 which, alongside the National Development Plan (NDP), forms the twin pillars of Project Ireland 2040. The NPF sits at the top of the Irish strategic planning hierarchy and guides the Regional Spatial and Economic Strategies (RSEs) for each of the three Regional Assembly Areas and, in turn, city and county development plans. The NPF establishes the overarching national policy framework within which regional and local planning policies are prepared.

The NDP, most recently revised in 2025, provides the corresponding capital investment framework for the delivery of Project Ireland 2040. The NDP identifies climate action and energy infrastructure as strategic investment priorities, including investment in the electricity transmission and distribution networks to accommodate increased renewable electricity generation. The Proposed Development, as a privately funded renewable energy project, will complement these investment priorities through the delivery of additional generating capacity and the use of associated electricity infrastructure.

The NPF and NDP identify ten common goals, known as National Strategic Outcomes (NSOs). NSO 8, Transition to a Low Carbon and Climate Resilient Society, supports the transition to a climate-neutral economy through the expansion of renewable energy generation and associated electricity infrastructure. It reflects the national objective of generating 80% of electricity from renewable sources by 2030, while recognising the need to reinforce the electricity transmission and distribution networks to accommodate increased renewable generation. Chapter 9 further emphasises the need to accelerate climate action through greenhouse gas emissions reductions, adaptation measures and investment in low-carbon infrastructure. It recognises the role of successive carbon budgets and Climate Action Plans in delivering Ireland's climate commitments, informed by European and international policy.

The NPF also places emphasis on the sustainable management and rehabilitation of Ireland's peatlands, recognising their importance for biodiversity, carbon storage, water management and climate change mitigation. It supports the transition of former industrial peatlands towards sustainable after-uses, including opportunities for renewable energy development and nature restoration.

### *Relevant National Policy Objectives*

In support of the overarching objectives of the NPF and the NSOs, a number of National Policy Objectives (NPOs) are set out and those of relevance to the Proposed Development are identified in **Table 2** below.

| NPO | Objective                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 66  | The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the medium and longer-term requirements of all relevant environmental and climate legislation and the sustainable management of our natural capital.                                                                                                                             |
| 70  | Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a climate neutral economy by 2050.                                                                                                                                                                                                                                                    |
| 71  | Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development.                                                                                                                                                                                                                                                                         |
| 73  | Support the co-location of renewable technologies with other supporting technologies and complementary land uses, including agriculture, amenity, forestry and opportunities to enhance biodiversity and promote heritage assets, at appropriate locations which are determined based upon the best available scientific evidence in line with EU and national legislative frameworks.                                                            |
| 74  | Each Regional Assembly must plan, through their Regional Spatial and Economic Strategy, for the delivery of the regional renewable electricity capacity allocations indicated for onshore wind and solar reflected in Table 9.1 below, and identify allocations for each of the local authorities, based on the best available scientific evidence and in accordance with legislative requirements, in order to meet the overall national target. |
| 75  | Local Authorities shall plan for the delivery of Target Power Capacity (MW) allocations consistent with the relevant Regional Spatial and Economic Strategy, through their City and County Development Plans.                                                                                                                                                                                                                                     |

**Table 2: Selected National Policy Objectives in the NPF**

### *Regional Renewable Electricity Capacity Allocations*

NPOs 74 and 75 establish a framework for translating national renewable electricity targets into regional and local capacity allocations. The NPF aligns with updated national commitments as established in CAP25, including a 51% greenhouse gas emissions reduction target by 2030 and target of achieving 9 GW of installed onshore wind capacity by 2030.

The NPF provides for the preparation of Regional Renewable Electricity Strategies (RRESs) to inform the delivery of these allocations and their distribution between local authority areas. According to the NPF, the Eastern and Midland Region, within which the Proposed Development is situated, currently has an estimated 284 MW of energised onshore wind generating capacity and has been allocated an additional 1,966 MW to be delivered by 2030 (an increase of approximately 692% relative to existing capacity).

Given the legacy of electricity production, the significant availability of grid infrastructure and extensive tracts of cutaway bogs, County Offaly currently plays an important role in the delivery of renewable energy capacity within the Eastern and Midland Region. The Proposed Development provides an opportunity to build upon this contribution by maximising the renewable electricity generation potential of the permitted Cush Wind Farm. The additional 3 no. turbines would provide approximately 18.3–21.6 MW of generating capacity, equivalent to approximately 0.9–1.1% of the Region's additional onshore wind capacity allocation of 1,966 MW. Together with the permitted 8 no. turbine Cush Wind Farm, the combined development would provide approximately 66.3–69.6 MW of installed capacity. By utilising infrastructure associated with an already permitted wind energy development, the proposal represents an efficient means of delivering additional renewable electricity capacity and further

contributing to the achievement of regional and national targets.

The Proposed Development therefore supports NPO 70 through the provision of additional renewable electricity generation and its contribution to decarbonisation and is consistent with NPO 71 through its proposed connection to the electricity network. It also contributes to the regional and local delivery objectives of NPOs 74 and 75.

Of particular relevance is NPO 73, which supports renewable energy development alongside complementary land uses and opportunities to enhance biodiversity. The Proposed Development has been designed having regard to the separately planned rehabilitation of Galros Bog by BnM, demonstrating how renewable electricity generation can be accommodated alongside peatland rehabilitation. This approach is consistent with the NPF's wider emphasis on the sustainable transition of former industrial peatlands, whereby renewable energy generation and ecological rehabilitation can form complementary elements of the future land use of these areas.

#### *Overall Compliance with National Policy Objectives*

The environmental assessment and mitigation measures accompanying the application demonstrate how the environmental considerations identified in NPO 66 have been addressed. Accordingly, the Proposed Development is considered consistent with the overarching framework and relevant objectives of the NPF.

### **10.3.2 Wind Energy Development Guidelines for Planning Authorities**

The Wind Energy Development Guidelines for Planning Authorities 2006 were issued under Section 28 of the 2000 Planning Act and provide guidance to planning authorities on the preparation of development plans and the assessment of wind energy proposals. The Guidelines recognise the need to achieve an appropriate balance between national renewable energy objectives and the proper planning and sustainable development of an area. They also provide guidance on the preparation of county-level Wind Energy Strategies, including the identification of areas suitable for wind energy development through the application of evidence-based criteria, having regard to environmental, landscape, technical and planning considerations. They address matters including site selection, landscape and visual impacts, residential amenity, noise, shadow flicker, environmental considerations and wind farm design.

The 2006 Guidelines remain the operative guidance pending the adoption of revised provisions. Draft Revised Wind Energy Development Guidelines for Planning Authorities 2019 were published for public consultation in December 2019 and included proposed revisions in relation to noise, setback distances, shadow flicker, community consultation, community benefit and grid connections. However, these provisions have not been formally adopted and do not supersede the 2006 Guidelines.

The Proposed Development has been designed having regard to the provisions of the 2006 Guidelines, which provide the principal guidance for its assessment. Regard has also been had to the 2019 Draft Guidelines, where relevant, particularly in respect of residential amenity, shadow flicker, community consultation and community benefit. In particular, the Proposed Development is considered to accord with the principal provisions of the 2006 Guidelines for the following reasons:

- The Proposed Development is located within an area designated as 'Areas Open for Consideration for Wind Energy Developments' under the Offaly County Wind Energy Strategy. It represents an extension to the permitted 8 no. turbine Cush Wind Farm, with the selected location informed by wind resource, access to existing infrastructure, environmental constraints and the established

pattern of wind energy development in the locality.

- The 3 no. turbine layout has been designed to form a coherent extension to the permitted Cush Wind Farm, having regard to turbine positioning, visual balance and cumulative landscape effects. The accompanying Landscape and Visual Impact Assessment considers 27 no. representative viewpoints and concludes that no significant residual landscape or visual effects are predicted.
- A minimum separation distance equivalent to four times the maximum turbine tip height has been applied to non-involved residential dwellings. The accompanying noise assessment demonstrates that the Proposed Development can operate within the applicable noise requirements. Automated turbine shutdown measures are also proposed to prevent shadow flicker at dwellings, workplaces and schools.
- The turbine layout and associated infrastructure have been informed by ecological, hydrological, geological and archaeological investigations. The accompanying EIAR and NIS assess the potential environmental effects of the Proposed Development, including cumulative effects with the permitted Cush Wind Farm and other relevant developments, and identify mitigation and monitoring measures where required.
- The Proposed Development has been designed to integrate with the permitted Cush Wind Farm, including the use of permitted access and construction infrastructure. The layout has also been informed by technical constraints, including the proximity of an existing 400 kV overhead electricity line, and seeks to minimise additional infrastructure and ground disturbance.
- The Applicant has undertaken community consultation throughout the development process, including engagement with local residents, public consultation events and ongoing stakeholder liaison. A community benefit scheme and enhanced near-neighbour arrangements are also proposed in conjunction with the permitted Cush Wind Farm.

Accordingly, the Proposed Development is considered to be consistent with the principal siting, design, environmental protection and residential amenity provisions of the 2006 Guidelines. The relevant environmental and amenity considerations are addressed in the accompanying EIAR and supporting application documentation.

## **11.0 REGIONAL**

### **11.1 REGIONAL SPATIAL & ECONOMIC STRATEGY**

#### *Overview*

The applicable regional planning framework is the Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019–2031 (RSES), prepared by the Eastern and Midland Regional Assembly (EMRA). The RSES provides the regional framework for implementing the NPF and informs the preparation of local authority development plans.

The RSES establishes a coordinated approach to regional development, infrastructure investment, economic growth and environmental protection. Its objectives support renewable energy development alongside the sustainable management of natural resources and the diversification of rural economies. The Strategy also recognises the opportunities associated with the transition away from industrial peat extraction, including alternative economic activities and the sustainable management of peatlands.

The principal Regional Policy Objectives (RPOs) relevant to the Proposed Development are summarised in **Table 3** below.

| RPO   | Objective                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 4.84  | 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. In keeping with the NPF, the Eastern and Midland Regional Assembly will support the longer term strategic planning for industrial peatland areas. This may include support, where appropriate, for a Transition Team in place and preparation of a comprehensive afteruse framework plan for the peatlands and related infrastructure, which addresses environmental, economic and social issues, including employment and replacement enterprise reflecting the current transition from employment based around peat extraction.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 7.7   | To reduce harmful emissions and achieve and maintain good air quality for all urban and rural areas in the Region and to work with local authorities and the relevant agencies to support local data collection in the development of air quality monitoring and to inform a regional air quality and greenhouse gas emissions inventory.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 7.10  | Support the implementation of the Water Framework Directive in achieving and maintaining at least good environmental status for all water bodies in the Region and to ensure alignment between the core objectives of the Water Framework Directive and other relevant Directives, River Basin Management plans and local authority land use plans.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 7.16  | Support the implementation of the Habitats Directives in achieving an improvement in the conservation status of protected species and habitats in the Region and to ensure alignment between the core objectives of the EU Birds and Habitats Directives and local authority development plans.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 7.29  | Support collaboration between local authorities, the Bord na Móna Transition Team and relevant stakeholders and the development of partnership approaches to integrated peatland management that incorporate any relevant policies and strategies such as the Bord na Móna Biodiversity Plan 2016-2021 and the national Climate Mitigation and Adaptation Plans. This shall include support for the rehabilitation and/or re-wetting of suitable peatland habitats.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 10.20 | Support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the Region and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy. This Includes the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity and gas transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and the planning process.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 10.22 | transmission and distribution network to facilitate planned growth and transmission/distribution of a renewable energy focused generation across the major demand centres to support an island population of 8 million people, including: <ul style="list-style-type: none"> <li>• Facilitating interconnection to Europe, particularly the 'Celtic Interconnector' to France and further interconnection to Europe/the UK in the longer term</li> <li>• Facilitating interconnection to Northern Ireland, particularly the 'North-South Interconnector' and further co-operation with relevant departments in Northern Ireland to enhance interconnection across the island in the longer term</li> <li>• Facilitating transboundary networks into and through the Region and between all adjacent Regions to ensure the RSES can be delivered in a sustainable and timely manner and that capacity is available at local, regional and national scale to meet future needs</li> <li>• Facilitate the delivery of the necessary integration of transmission network requirements to allow linkages of renewable energy proposals to the electricity transmission grid in a sustainable and timely manner</li> </ul> |

- support the safeguarding of strategic energy corridors from encroachment by other developments that could compromise the delivery of energy networks.

**Table 3: Selected Regional Policy Objectives in the EMRA RSES**

### *Renewable Energy Development and Regional Capacity Targets*

The Proposed Development will provide additional renewable electricity generating capacity, contributing to the RSES objectives concerning renewable energy, rural diversification and the transition to a low-carbon economy. The Proposed Development will also generate local economic and employment benefits through construction and operational expenditure and the proposed community benefit scheme.

EMRA commenced a review of the RSES in March 2026 to reflect the revised NPF and updated national policy objectives. Of particular relevance is the proposed preparation of a Regional Renewable Electricity Strategy (RRES) as part of the revised RSES, giving effect to NPOs 74 and 75 of the NPF. As outlined in the March 2026 Strategic Issues Paper, the RRES is intended to translate the regional renewable electricity capacity allocations established under the NPF into county-level targets for onshore wind, which will subsequently inform local authority development plans<sup>5</sup>. The RRES will also address electricity grid infrastructure, energy security and coordination between public bodies.

As discussed above, the NPF allocates an additional 1,966 MW of onshore wind capacity to the Eastern and Midland Region towards 2030. The Proposed Development, with an estimated installed capacity of 18.3–21.6 MW, would contribute approximately 0.9–1.1% of this allocation and is therefore supportive of the renewable electricity objectives underpinning both the adopted NPF and the emerging regional policy framework. When considered alongside the permitted 8 no. turbine Cush Wind Farm, the combined installed capacity of approximately 66.3–69.6 MW would represent approximately 3.4–3.5% of the additional regional allocation.

### *Transition of Former Industrial Peatlands*

The transition away from industrial peat extraction is a significant consideration within the RSES, particularly in the context of identifying sustainable alternative land uses and supporting the economic diversification of areas historically dependent on peat extraction. RPO 4.84 specifically supports longer-term strategic planning for industrial peatland areas, including the preparation of after-use frameworks that address environmental, economic and social considerations.

The Proposed Development is located on Galros Bog, an area of former industrial peat extraction, and represents an opportunity to accommodate renewable electricity generation as part of the wider transition towards sustainable uses of these lands. Its location is therefore particularly relevant to RPO 4.84, which recognises both renewable energy development and the need to support alternative economic activities in former peat-producing areas.

RPO 7.29 further supports integrated peatland management, including the rehabilitation and rewetting of suitable peatland habitats. As discussed in **Section 12.4** below, the Proposed Development has been designed having regard to the separate, ongoing and planned rehabilitation of Galros Bog by BnM, consistent with the integrated peatland management and rehabilitation objectives of RPO 7.29. The rehabilitation programme is being undertaken independently by BnM and does not form part of the Proposed Development. The Proposed Development has, however,

<sup>5</sup> [www.emra.ie/rses-review-strategic-issues-paper](http://www.emra.ie/rses-review-strategic-issues-paper)

been designed to take account of these activities, allowing renewable energy development and peatland rehabilitation to be considered as complementary land uses.

The Proposed Development is also consistent with the objectives of RPOs 10.20 and 10.22 concerning electricity infrastructure and the integration of renewable electricity generation into the electricity network. The environmental considerations arising under the RSES, including biodiversity, water quality, peat stability and landscape impacts, are addressed in the accompanying EIAR and NIS.

### *Overall Compliance with the RSES*

Having regard to its renewable energy contribution, rural economic benefits, location on former industrial peatlands, compatibility with the separate peatland rehabilitation programme and environmental assessment, the Proposed Development is considered consistent with the relevant objectives of the adopted RSES.

## **12.0 LOCAL**

### **12.1 OFFALY COUNTY DEVELOPMENT PLAN**

#### *Overview*

The Offaly County Development Plan 2021–2027 ('the Offaly CDP') came into effect on 22 October 2021. The Offaly CDP establishes a generally supportive policy framework for renewable energy development, recognising its importance in reducing greenhouse gas emissions, enhancing energy security and supporting the transition to a low-carbon economy. The Plan also recognises the potential for renewable energy development as an appropriate after-use of former industrial peatlands, subject to environmental and planning considerations. Selected policies relevant to the Proposed Development are summarised in **Table 4**.

| Reference | Objective                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| CAEP-01   | It is Council policy to support and facilitate the development, reinforcement, renewal and expansion of the electricity transmission and distribution grid, including the development of new lines, pylons and substations as required to provide for the future physical and economic development of Offaly.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| CAEP-02   | It is Council policy to require that, in all new developments, local services such as medium and low voltage electricity cables shall be undergrounded, with multiple services accommodated in shared strips underground and that access covers are shared, whenever possible.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| CAEP-05   | It is Council policy to support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned growth and transmission/distribution of a renewable energy focused generation across the major demand centres. This includes: <ul style="list-style-type: none"> <li>• Facilitating trans-boundary networks into and through the County and Region to ensure the Regional Spatial and Economic Strategy can be delivered in a sustainable and timely manner;</li> <li>• Facilitate the delivery of the necessary integration of transmission network requirements to allow linkages of renewable energy proposals to the electricity transmission grid in a sustainable and timely manner; and</li> <li>• Support the safeguarding of strategic energy corridors from encroachment by other developments that could compromise the delivery of energy networks. Energy Storage</li> </ul> |
| CAEP-07   | It is Council policy to support and facilitate European and national objectives for climate adaptation and mitigation as detailed in the following documents, taking into account other provisions of the Plan (including those relating to land use planning, energy, sustainable mobility, flood risk management and drainage); <ul style="list-style-type: none"> <li>• Climate Action Plan (2019 and any subsequent versions);</li> <li>• National Mitigation Plan 2017 (or subsequent editions);</li> <li>• National Climate Change Adaptation Framework (2018 and any subsequent versions);</li> </ul>                                                                                                                                                                                                                                                                                                                                 |

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|         | <ul style="list-style-type: none"> <li>• Relevant provisions of any Sectoral Adaptation Plans prepared to comply with the requirements of the Climate Action and Low Carbon Development Act 2015, including those seeking to contribute towards the National Transition Objective, to pursue, and achieve, the transition to a low carbon, climate resilient and environmentally sustainable economy by the end of the year 2050; and</li> <li>• Offaly Climate Change Adaptation Strategy.</li> </ul>                                                                                                                                                                                                                                                       |
| CAEP-10 | It is Council policy to support local, regional, national and international initiatives for climate adaptation and mitigation and to limit emissions of greenhouse gases through energy efficiency and the development of renewable energy sources which make use of all natural resources, including publicly owned lands, in an environmentally acceptable manner.                                                                                                                                                                                                                                                                                                                                                                                         |
| CAEP-11 | It is Council policy to support the transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050, by way of reducing greenhouse gases, increasing renewable energy, and improving energy efficiency.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| CAEP-15 | It is Council policy to support the enhancement of carbon sinks such as peatlands, forestry, and permanent grasslands, with consideration of in conjunction with other climate mitigation actions such as the re-wetting and restoration of cut away peatlands, where appropriate. Peatlands                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| CAEP-16 | It is Council policy to support the preparation of a comprehensive afteruse framework plan for the industrial peatlands and associated workshops, office buildings and industrial sites in the midlands and adjacent parts of the north west and southern regions, which meets the environmental, economic and social needs of communities in these areas, and also demonstrating leadership in climate change mitigation and land stewardship. The Council recognises that the industrial peatlands in the midlands are a significant resource will transition to after uses ranging from amenity, tourism, biodiversity services, 'wild areas', flood management, climate mitigation, energy development, industry, education, conservation and many more. |
| CAEP-18 | It is Council policy to investigate the feasibility of an energy park with educational and amenity facilities relating to any future development of renewable energy projects of significant scale that comes forward over the lifetime of this Plan. Any development of renewable energy on cutaway bog will be required to provide increased opportunities for amenity access and educational facilities.                                                                                                                                                                                                                                                                                                                                                  |
| CAEP-19 | It is Council policy that planning applications for development on or immediately adjacent to peatlands shall be accompanied by assessments considering the following issues where relevant; peatland stability, hydrology, carbon emissions balance and ecological impact assessment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| CAEP-23 | It is Council policy to require that environmental assessments should address reasonable alternatives for the location of new energy developments, and where existing infrastructural assets such as sub-stations, power lines and roads already exist within the proposed development areas, then such assets should be considered for sustainable use by the proposed development where the assets have capacity to absorb the new development. Renewable Energy                                                                                                                                                                                                                                                                                           |
| CAEP-25 | It is Council policy to encourage and facilitate the production of energy from renewable sources, such as from bioenergy, waste material, solar, hydro, geothermal and wind energy, subject to proper planning and environmental considerations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| CAEP-26 | It is Council policy to encourage developers of proposed large scale renewable energy projects to carry out community consultation in accordance with best practice and to commence the consultation at the commencement of project planning.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| CAEP-27 | It is Council policy to ensure that whenever possible, community benefits are derived from all renewable energy development in the county such as near-neighbour benefit funds and general community benefit funds, which may take the form of contributions in kind to local projects, assets and facilities such as public amenities on the renewable energy site, measures to promote energy efficiency or a local energy discount scheme.                                                                                                                                                                                                                                                                                                                |
| CAEP-37 | It is Council policy to recognise the importance of wind energy as a renewable energy source which can play a vital role in achieving national targets in relation to reductions in fossil fuel dependency and therefore greenhouse gas emissions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| CAEP-38 | It is Council policy that in assessing planning applications for wind farms, the Council shall: (a) have regard to the provisions of the Wind Energy Development Guidelines 2006 and the Draft revised Wind Energy Guidelines 2019 which are expected to be finalised in the near future; (b) have regard to 'Areas Open for Consideration for Wind Energy Developments' in the Wind Energy Strategy Designations Map from the County Wind Energy Strategy; (c) stringently assess the impact of the proposed wind farm                                                                                                                                                                                                                                      |

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|         | development on the 'Peatland and Nature Corridors' as detailed in Objective BLO-28 of Chapter 4; (d) have regard to Development Management Standard 109 on wind farms contained in Chapter 13 of this Plan; and (e) have regard to existing and future international, European, national and regional policy, directives and legislation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| CAEO-03 | It is an objective of the Council to achieve a reasonable balance between responding to government policy on renewable energy and in enabling the wind energy resources of the county to be harnessed in an environmentally sustainable manner. Wind Energy                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| CAEO-04 | It is an objective of the Council to ensure the security of energy supply by supporting the potential of the wind energy (and other renewable) resources of the County in a manner that is consistent with proper planning and sustainable development of the area.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| CAEO-05 | It is an objective of the Council to implement the Council's Wind Energy Strategy as follows: <ul style="list-style-type: none"> <li>• In 'Areas Deemed Open for Consideration for Wind Energy Development' as identified in Map No. 10 'Wind Energy Strategy Designations', the development of windfarms and smaller wind energy projects will be considered;</li> <li>• In all other areas, wind energy developments shall not normally be permitted – except as provided for under relevant exemption provisions in the Planning and Development Regulations 2001 (as amended); and</li> <li>• Applications for re-powering (by replacing existing wind turbines) and extension of existing and permitted wind farms will be assessed on a case by case basis and will be subject to criteria listed in Development Management Standard 109 contained in Chapter 13 of Volume 1 of this County Development Plan and the Section 28 Ministerial Wind Energy Development Guidelines. Peatlands</li> </ul> |
| CAEO-07 | It is an objective of the Council to ensure that renewable energy projects located on peatlands or in close proximity to peatlands do not negatively impact on any rehabilitation measures including enhanced rehabilitation measures (i.e. drain blocking and rewetting). Low Carbon District Heating                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| BLP-01  | It is Council policy to protect, conserve, and seek to enhance the county's biodiversity and ecological connectivity.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| BLP-02  | It is Council policy to conserve and protect habitats and species listed in the Annexes of the EU Habitats Directive (92/43/EEC) (as amended) and the Birds Directive (2009/147/EC), the Wildlife Acts 1976 (as amended) and the Flora Protection Orders.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| BLP-05  | It is Council policy to ensure that development does not have a significant adverse impact, incapable of satisfactory avoidance or mitigation, on plant, animal or bird species protected by law.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| BLP-09  | It is Council policy to protect from inappropriate development and maintain the character, integrity and conservation value of features or areas of geological interest as contained in the scheduled list of geological heritage sites identified in Table 4.11 Offaly Geological Sites.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| BLP-11  | It is Council policy to protect and conserve the landscape, natural heritage and biodiversity value of esker systems in the county as identified in the Offaly Esker Study, 2006.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| BLP-18  | It is Council policy to support collaboration between Offaly County Council, Regional Transition Team and relevant stakeholders of a partnership approach to integrated peatland management for a just transition that incorporates the management, rehabilitation and restoration / re-wetting of significant tracts of peatlands in conjunction with appropriate developed after uses. Waterways, Lakes and Wetland Landscapes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| BLP-20  | It is Council policy to preserve riparian buffer strips free from development by reserving a minimum of 10 metres either side of all watercourses (measured from top of bank) with the full extent of the protection determined on a case by case basis by the Council, based on site specific characteristics and sensitivities.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| BLP-24  | It is Council policy to support the protection and management of existing networks of woodlands, trees and hedgerows which are of amenity or biodiversity value and/or contribute to landscape character, and to strengthen local networks.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| BLO-22  | It is an objective of the Council to ensure that new development, whether individually or cumulatively, does not impinge in any significant way on the character, integrity and distinctiveness of or the scenic value of the Areas of High Amenity listed in Table 4.17. New development in Areas of High Amenity shall not be permitted if it; <ul style="list-style-type: none"> <li>• Causes unacceptable visual harm;</li> <li>• Introduces incongruous landscape elements; and</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

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|         | <ul style="list-style-type: none"> <li>Causes the disturbance or loss of (i) landscape elements that contribute to local distinctiveness; (ii) historic elements that contribute significantly to landscape character and quality such as field or road patterns; (iii) vegetation which is a characteristic of that landscape type and (iv) the visual condition of landscape elements. Landscape</li> </ul>                                                                                                                                                                                                                                                                                                                        |
| BLO-24  | It is an objective of the Council to have regard to the Landscape Sensitivity Areas in Tables 4.18, 4.19 and 4.20 in the consideration of planning applications.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| BLO-26  | It is an objective of the Council to protect Key Scenic Views and Key Prospects contained in Table 4.21, and Key Amenity Routes as listed in Table 4.22 from inappropriate development.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| BLO-27  | It is an objective of the Council to ensure that proposed developments take into consideration their effects on views from Key Scenic Views and Prospects and Key Amenity Routes and are designed and located to minimise their impact on this views and prospects. 'Peatland and Nature Corridors'                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| BLO-28  | It is an objective of the Council to protect the County's 'Peatland and Nature Corridors' as shown in Figure 4.9(b) in such a manner that any future development therein is of an appropriate scale and design that does not give rise to significant adverse impacts on the environment, biodiversity & habitats, landscape character, or visual amenity and can integrate effectively into its surroundings; to strictly direct large scale energy production projects, most particularly wind farms, onto areas that are located outside of the 'Peatland and Nature Corridors', and to integrate routes identified in the Midlands Cycling Destination - Offaly Network Map and the National Cycle Network within the corridors. |
| BHP-01  | It is Council policy to ensure the protection, sympathetic and sensitive modification, alteration, extension or reuse of protected structures or parts of protected structures, and the immediate surrounds included and proposed for inclusion in the Record of Protected Structures that are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest, together with the integrity of their character and setting.                                                                                                                                                                                                                                                       |
| BHP-28  | [It is Council policy to encourage the protection, conservation, promotion and enhancement of Country Houses, Gardens and Demesnes in the county and support public awareness, enjoyment of and access to these sites where appropriate.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| BHP-30  | It is Council policy to discourage development that would lead to a loss of, or cause damage to, the character, the principal components of, or the setting of Country Houses, Gardens and Demesnes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| BHP-37  | It is Council policy that any development that may, due to its size, location or nature, have implications for archaeological heritage (including both sites and areas of archaeological potential / significance) shall be subject to an archaeological assessment. When dealing with proposals for development that would impact upon archaeological sites and/or features, there will be presumption in favour of the 'preservation in situ' of archaeological remains and settings, in accordance with Government policy. Where permission for such proposals is granted, the Planning Authority will require the developer to have the site works supervised by a licensed archaeologist.                                       |
| BHO-05  | It is an objective of the Council to protect archaeological sites and monuments, and archaeological objects, which are listed in the Record of Monuments and Places, and to seek their preservation in situ (or at a minimum, preservation by record) through the planning process.                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| ENVO-01 | It is an objective of the Council to ensure, through the implementation of the River Basin Management Plan, and any other associated legislation, the protection and improvement of all drinking water, surface water and ground waters throughout the county.                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| ENVO-03 | It is an objective of the Council to protect both ground and surface water resources; to work with Irish Water to develop and implement Drinking Water Safety Plans to protect sources of public water supply and their contributing catchment; and to work with the National Federation of Group Water Schemes in respect of Source Protection Plans for Group Water Schemes to protect these sources.                                                                                                                                                                                                                                                                                                                              |
| ENVP-24 | It is Council policy to assess, as relevant, proposals for development in terms of, inter alia, potential impact on existing adjacent developments, existing land uses and/or the surrounding landscape. Where proposed developments would be likely to have a significant adverse effect on the amenities of the area through pollution by noise, fumes, odours, dust, grit or vibration, or cause pollution of air, water and/or soil, mitigation                                                                                                                                                                                                                                                                                  |

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|         | measures shall be introduced in order to eliminate adverse environmental impacts or reduce them to an acceptable operating level. Application of this policy will take into account instances whereby activities are licensed by other bodies through other processes (such as Integrated Pollution Control Licensing or Industrial Emissions Licensing).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| DMS-109 | <p>Wind When assessing planning applications for wind energy developments the Farms Council will have regard to;</p> <ul style="list-style-type: none"> <li>the Wind Energy Development Guidelines for Planning Authorities, DoEHLG, (2006) and any amendments to the Guidelines which may be made; and</li> <li>the Wind Energy Strategy Designations Map from the County Wind Energy Strategy showing areas identified as 'Areas Open for Consideration for Wind Energy Developments' and 'Areas not deemed suitable for Wind Energy Developments', and specific policy and objective BLO-28 for wind development in these areas as outlined in Section 8 of the County Wind Energy Strategy;</li> </ul> <p>In addition to the above, the following local considerations will be taken into account by the Council in relation to any planning application;</p> <ul style="list-style-type: none"> <li>Impact on the visual amenities of the area;</li> <li>Impact on the residential amenities of the area;</li> <li>Scale and layout of the project, any cumulative effects due to other projects and the extent to which the impacts are visible across the local landscape;</li> <li>Visual and cumulative impact of the proposal with respect to protected views, scenic routes and designated scenic landscapes and 'Peatland and Nature Corridors' as detailed in Chapter 4 of this Plan;</li> <li>Impact on the 'Peatland and Nature Corridors' (Objective BLO-28) in terms of tranquillity, landscape, options for amenity and tourism development, biodiversity protection and enhancement, and carbon sequestration.</li> <li>Impact on nature conservation, ecology, soil, hydrology, groundwater, archaeology, built heritage and public rights of way;</li> <li>Impact on ground conditions and geology;</li> <li>Consideration of falling distance plus an additional flashover distance from wind turbines to overhead transmission lines;</li> <li>Impact of development on the road network in the area;</li> <li>Impact of the development on radio observatories and broadcast communications in the area; and</li> <li>Impact on human health in relation to noise disturbance (including consistency with the World Health Organisations 2018 Environmental Noise Guidelines for the European Region), shadow flicker and air quality. This list is not exhaustive and the Council may consider other requirements contained in the chapter on a case by case basis with planning applications should the need arise. Where impacts are predicted to arise as a result of the development proposed, suitably detailed mitigation measures shall be proposed.</li> </ul> |

**Table 4: Selected Policies, Objectives and Development Management Standards in the Offaly CDP (as varied)**

### *Renewable Energy and Climate Action*

The Proposed Development is consistent with the renewable energy and climate action policies of the Offaly CDP, particularly CAEP-07, CAEP-10, CAEP-11, CAEP-25 and CAEP-37, which support the development of renewable energy resources, the reduction of greenhouse gas emissions and the transition towards a low-carbon economy. The Proposed Development will provide additional renewable electricity generating capacity, contributing towards national and regional renewable electricity targets and reducing reliance on fossil fuel-based electricity generation.

The Proposed Development is also consistent with CAEO-03 and CAEO-04, which seek to balance the development of the county's renewable energy resources with environmental protection and the proper planning and sustainable development of the area. The accompanying EIAR and NIS assess the potential environmental effects of the Proposed Development and identify mitigation measures, where required.

The Offaly County Council Climate Action Plan 2024–2029 provides a further local policy framework for climate mitigation, adaptation and the transition to a low-

carbon economy. The Proposed Development would contribute to the objectives of the Plan through additional renewable electricity generation, while its design and environmental assessment have considered relevant matters including peatland management, biodiversity and water protection. The likely significant effects of the Proposed Development on climate are assessed in Chapter 9 of the accompanying EIAR.

### *Wind Energy Strategy and Development Management*

The Proposed Development is located within an area designated as 'Open for Consideration for Wind Energy Developments' under Map No. 10 of the Offaly CDP Wind Energy Strategy. This designation establishes that wind energy development may be considered at this location, subject to the relevant planning and environmental considerations.

Of particular relevance is CAEO-05, which expressly provides for the assessment of extensions to existing and permitted wind farms on a case-by-case basis. The Proposed Development comprises an extension of the permitted 8 no. turbine Cush Wind Farm and is therefore consistent with the approach established under this objective.

CAEP-38 requires the Planning Authority to have regard to the Wind Energy Development Guidelines, the county's Wind Energy Strategy designations, the Peatland and Nature Corridors provisions, Development Management Standards (Objective DMS-109) and relevant international, European, national and regional policy. These matters are addressed in this Planning Statement and the accompanying application documentation. Compliance with DMS-109 is assessed separately in **Section 12.3** below.

### *Transition of Former Industrial Peatlands*

The Offaly CDP recognises the transition of former industrial peatlands towards alternative uses, including renewable energy generation, biodiversity enhancement, climate mitigation and amenity development. CAEP-16 is particularly relevant, as it supports the preparation of an after-use framework for industrial peatlands that addresses the environmental, economic and social needs of communities historically dependent on peat extraction.

The Proposed Development is partially situated within Galros Bog, an area of former industrial peat extraction, and represents a renewable energy use consistent with the wider transition of these lands. It would also contribute to the diversification of the local economy through construction and operational expenditure and the proposed community benefit scheme.

CAEP-15, CAEP-19, CAEO-07 and BLP-18 address peatland management, environmental assessment and the protection of peatland rehabilitation measures. As discussed in **Section 12.4** below, the Proposed Development has been designed having regard to the separate rehabilitation programme being undertaken by BnM at Galros Bog. The likely significant effects on peat stability, hydrology, carbon emissions and ecology are assessed in the accompanying EIAR. The rehabilitation programme is being undertaken independently by BnM and does not form part of the Proposed Development.

In particular, the Proposed Development has also been designed to take account of the rehabilitation measures proposed for Galros Bog, consistent with CAEO-07, which seeks to ensure that renewable energy development does not adversely affect peatland rehabilitation.

### *Peatland and Nature Corridors*

Variation No. 1 of the Offaly CDP, adopted on 20 July 2026, introduced amendments to Objective BLO-28 concerning Peatland and Nature Corridors. The Proposed Development is located outside the Peatland and Nature Corridors identified on Figure 4.9(b) of the Offaly CDP, as varied.

### *Electricity Infrastructure*

CAEP-01, CAEP-02 and CAEP-05 support the development and reinforcement of electricity infrastructure to facilitate renewable energy generation. The Proposed Development will include underground electrical cabling and associated infrastructure to facilitate its connection to the electricity network. The off-site electricity connection infrastructure will be the subject of a separate future planning application. These elements are consistent with the objectives of the Offaly CDP concerning the integration of renewable electricity generation and the undergrounding of electricity services, where appropriate.

### *Community Engagement and Community Benefit*

CAEP-26 encourages early community consultation in accordance with best practice, while CAEP-27 seeks to ensure that renewable energy developments deliver benefits to local communities.

Community consultation has been undertaken in connection with the Proposed Development, as described in **Section 7.3** above. As also described in **Section 8.0**, the Proposed Development would also contribute to the community benefit arrangements associated with Cush Wind Farm, including near-neighbour and wider community benefit measures, consistent with CAEP-27.

### *Environmental Protection and Residential Amenity*

The Offaly CDP contains a range of policies and objectives relating to biodiversity, landscape protection, water quality, cultural heritage and residential amenity. These include BLP-01, BLP-02, BLP-05, BLP-20, BLO-24, BLO-26, BLO-27, BHP-01, BHP-37, BHO-05, ENVO-01, ENVO-03 and ENVP-24.

The potential effects of the Proposed Development on these environmental receptors have been assessed in the accompanying EIAR and NIS, including cumulative effects with the permitted Cush Wind Farm and other relevant developments. The assessments identify mitigation measures, where necessary, to avoid, reduce or otherwise address potential adverse effects.

### *Overall Compliance with the Offaly CDP*

Having regard to its location within an area designated as 'Open for Consideration for Wind Energy Developments', its location immediately adjacent to the permitted Cush Wind Farm, its contribution to renewable electricity generation capacity, its compatibility with the separate peatland rehabilitation programme and the environmental assessments accompanying the application, the Proposed Development is considered consistent with the relevant policies and objectives of the Offaly CDP.

## **12.2 WIND ENERGY STRATEGY**

The Offaly County Wind Energy Strategy forms part of the Offaly CDP and provides a strategic framework for the development of the county's wind resource having regard to grid access, landscape sensitivity, proximity to housing, natural and built heritage and other constraints. The Wind Energy Strategy was prepared in accordance with the Wind Energy Development Guidelines for Planning Authorities (2006).

As illustrated in **Figure 2** below, Map 10 of the Wind Energy Strategy identifies areas open for consideration and areas not deemed suitable for wind energy development. The Proposed Development site is located within the designation 'Areas Open for Consideration for Wind Energy Developments'. These areas are considered suitable for consideration for wind energy development on the basis that they are characterised by low housing densities, do not conflict with European or nationally designated sites and have landscape characteristics capable of accommodating wind farm developments. In particular, these areas:

- have viable wind speeds and good access to the electricity grid;
- are free from identified environmental and landscape constraints;
- are characterised by dispersed or sparse patterns of rural housing; and
- are of a sufficient size to accommodate commercial wind farms and associated infrastructure rather than comprising smaller, remote and dispersed areas.

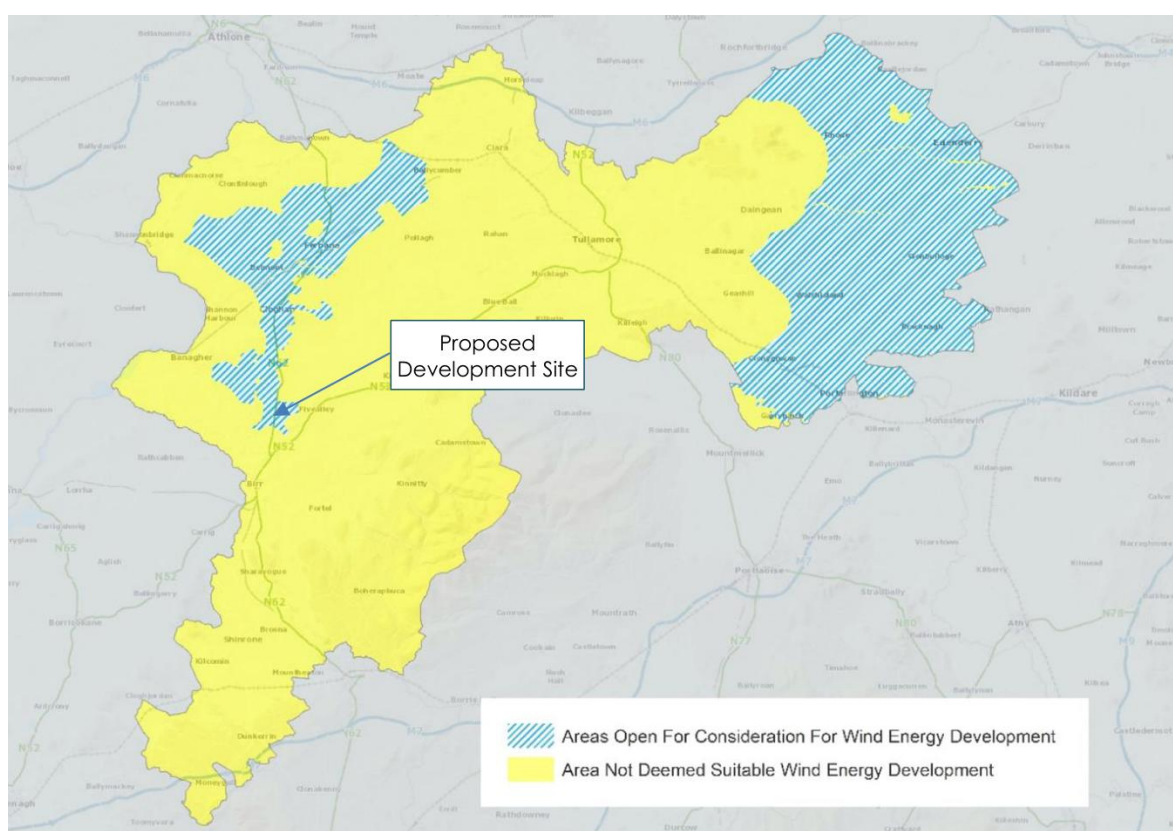


**Figure 2: Designations in Map 10 of the Offaly County Wind Energy Strategy**

The Proposed Development site is located within the designated area generally south of Cloghan, identified as Area No. 7 in the Wind Energy Strategy. According to the Strategy, this area is characterised by a predominantly flat and, in places, slightly undulating landscape with significant tracts of peatlands, transitional woodlands and areas of coniferous forestry. The Strategy also identifies good wind speeds and reasonable access to the electricity grid. The extensive tracts of flat peatlands in this area offer potential to accommodate a wind farm layout with depth, comprising a grid formation that provides a better sense of balance and visual cohesion. In addition, the Strategy acknowledges the precedent established by existing wind farms and renewable energy developments in the area, together with other projects that have been deemed suitable for development. It is considered that the Proposed

Development is consistent with this strategic designation, comprising an extension to the permitted 8 no. turbine Cush Wind Farm within an area expressly identified as open for consideration for wind energy development.

### 12.3 DEVELOPMENT MANAGEMENT CRITERIA

Notwithstanding the location of the site within an area designated as 'Areas Open for Consideration for Wind Energy Developments', the Wind Energy Strategy provides that proposed wind energy developments will be evaluated on a case-by-case basis having regard to the criteria set out in Development Management Standard 109 (DMS-109) and the Wind Energy Development Guidelines for Planning Authorities (2006).

DMS-109 sets out the principal development management criteria for assessing wind energy proposals under the Offaly CDP and requires the Planning Authority to have regard to the County Wind Energy Strategy Designations Map (**Figure 2**). In addition, DMS-109 identifies a range of site-specific criteria, including landscape and visual effects, residential amenity, cumulative impacts, ecology, hydrology, ground conditions, cultural heritage, infrastructure and human health.

#### *Precedent Decisions*

Objective CAEO-05 also applies these criteria to applications for the extension of existing and permitted wind farms. The planning permission granted by the Commission in November 2024 for the Cush Wind Farm provides an important site-specific planning context for the Proposed Development. The permitted wind farm is located immediately to the south-west of the Proposed Development site and was assessed under the Offaly County Development Plan 2021–2027, including the County Wind Energy Strategy and the applicable development management criteria.

The Commission's Inspector noted that the permitted Cush Wind Farm was located within an area designated as 'Areas Open for Consideration for Wind Energy Developments'. Having regard to this designation and the wider European, national and local policy context, the Inspector concluded that wind energy development at the location was acceptable in principle, subject to the normal planning and environmental considerations.

The Inspector's assessment considered the characteristics of the local landscape, including its history of peat extraction and existing wind energy development, and identified residential amenity, landscape and visual effects, and cumulative impacts as particularly important considerations. These matters were examined alongside the other relevant environmental and planning considerations through the EIA and AA processes. Following the Inspector's recommendation to grant permission, the Commission granted permission, concluding that, subject to conditions, it would accord with the proper planning and sustainable development of the area.

The permitted Cush Wind Farm is therefore a relevant precedent in establishing the acceptability in principle of wind energy development within this locality. Nevertheless, while the Proposed Development represents an extension of the permitted wind farm, its acceptability must be determined on its individual merits, having regard to the applicable development plan provisions and the findings of the accompanying environmental assessments.

The following sections consider the principal development management criteria identified in DMS-109 in the context of the Proposed Development. Each section outlines how the relevant matters have been addressed in the design and assessment of the Proposed Development, with references to the EIAR and supporting application documentation where further information is provided.

### *Wind Energy Guidance and Spatial Policy*

The Proposed Development is consistent with the spatial approach to wind energy development established under the Offaly CDP. It is located within an area designated as 'Areas Open for Consideration for Wind Energy Developments' under the County Wind Energy Strategy and constitutes an extension to the permitted Cush Wind Farm.

As discussed in **Section 10.3.2** above, the proposed turbine layout and dimensions have been developed having regard to the Wind Energy Development Guidelines for Planning Authorities (2006), the County Wind Energy Strategy and the applicable development management criteria. The design has also been informed by consideration of alternative layouts, environmental constraints and the opportunity to utilise infrastructure permitted as part of Cush Wind Farm.

The relevant planning policy considerations are addressed in the preceding sections of this Planning Statement. Further details of the design process, turbine dimensions and infrastructure are provided in Chapters 1, 2 and 3 of the EIAR.

### *Landscape, Visual Effects and Cumulative Layout*

The Proposed Development has been designed to form a coherent extension to the permitted Cush Wind Farm, rather than an unrelated group of turbines within the surrounding landscape. The three proposed turbines are located to the northeast of the permitted turbines, with their positioning informed by landscape and visual considerations and the relationship between the two developments.

The Landscape and Visual Impact Assessment submitted with the Planning Application considers 27 no. representative viewpoints and includes a cumulative assessment with Cush Wind Farm and other relevant wind energy developments. While the Proposed Development will introduce noticeable changes within its immediate surroundings, the assessment concludes that the residual landscape and visual effects, including cumulative effects, will not be significant in EIA terms.

The Proposed Development is therefore considered to satisfactorily address the landscape, visual amenity and cumulative layout considerations of DMS-109. Further details are provided in Chapter 10 of the EIAR and the supporting photomontages and visual assessments at Annexes 10.1, 10.2 and 10.3.

### *Residential Amenity and Human Health*

The Proposed Development has been designed to safeguard residential amenity through appropriate turbine separation distances, layout design and operational controls. A minimum separation distance equivalent to four times the maximum turbine tip height has been applied to non-involved residential dwellings.

The EIAR assesses potential effects on nearby residents, including construction disturbance, operational noise, shadow flicker, air quality and human health. The noise assessment confirms that the Proposed Development can operate within the applicable noise requirements.

The Applicant has also committed to preventing shadow flicker attributable to the Proposed Development at local receptors through automated turbine shutdown controls. With these measures implemented, no significant residual shadow flicker effects are assessed as likely.

The Proposed Development is therefore considered to appropriately address the residential amenity and human health requirements of DMS-109. Supporting assessments are provided in Chapters 4, 8, 12 and 13 of the EIAR, with the residential dwelling locations illustrated at Annex 13.1.

### *Peatland and Nature Corridors*

The Proposed Development is located outside the areas identified as Peatland and Nature Corridors on Figure 4.9(b) of the Offaly CDP, as varied.

### *Biodiversity and European Sites*

The Proposed Development has been designed and assessed with regard to the ecological characteristics of Galros Bog and the surrounding area. Ecological and ornithological surveys have informed the turbine layout, infrastructure design and proposed mitigation measures.

The assessment considers potential effects on habitats, birds, bats and other protected species, including effects associated with habitat disturbance, construction activities and turbine operation. Proposed mitigation measures include habitat protection, pollution prevention, vegetation management around turbines and operational monitoring of birds and bats, with further controls to be implemented where required.

The ecological assessment concludes that significant residual effects on important habitats and species are assessed as unlikely, subject to implementation of the identified mitigation measures. Potential effects on European sites have also been considered in the NIS.

The Proposed Development is therefore considered to appropriately address the biodiversity considerations of DMS-109. Further details are provided in Chapter 5 of the EIAR and the separate AA Screening Report and NIS.

### *Ground Conditions, Geology and Peat*

The Proposed Development is situated predominantly on previously worked peatland, and its design has been informed by peat-depth investigations, geotechnical assessment and consideration of ground stability.

The proposed infrastructure has been designed having regard to these conditions, with excavation methods, material handling, drainage and peat deposition arrangements developed to minimise ground disturbance and manage stability risks. The Peat Stability Assessment concludes that the site has an acceptable margin of safety and is at low risk of peat failure or ground instability.

The Proposed Development is therefore considered to satisfactorily address the geological and ground stability considerations of DMS-109, subject to implementation of the specified construction controls.

Further details are provided in Chapter 6 of the EIAR and the Geotechnical and Peat Stability Assessment at Annex 6.1. The Galros Bog Draft Cutaway Bog Decommissioning and Rehabilitation Plan (2026), prepared by BnM in respect of its separate rehabilitation proposals, is included at Annex 6.2. The Proposed Development has been designed and assessed having regard to these rehabilitation proposals.

### *Hydrology, Groundwater and Flooding*

The Proposed Development incorporates drainage and water management measures intended to protect surface water, groundwater and existing drainage systems during construction and operation.

The proposed wind farm infrastructure is located within Flood Zone C, representing the area of lowest mapped fluvial flood probability. The drainage design provides for the separation of clean and potentially contaminated runoff, settlement and treatment measures, controlled discharge and ongoing monitoring. The design has also taken

account of the existing drainage network and the separate rehabilitation proposals for Galros Bog.

The hydrological assessment concludes that, with the proposed mitigation measures implemented, no significant residual effects on surface water, groundwater or water supplies are assessed as likely. The Proposed Development is also not likely to cause deterioration in the status of water bodies or prevent the achievement of their environmental objectives.

Accordingly, the Proposed Development is considered to satisfactorily address the hydrological and flood risk considerations of DMS-109. Further details are provided in Chapter 7 of the EIAR, the Flood Risk Assessment at Annex 7.1 and the Water Framework Directive Compliance Assessment at Annex 7.3.

### *Archaeology and Built Heritage*

The Proposed Development has been designed to avoid direct impacts on recorded archaeological and architectural heritage features within the proposed works footprint. Archaeological investigations, including a specialist peatland survey, have informed the assessment and the proposed mitigation measures.

While previously unrecorded archaeological remains may be encountered during construction, licensed archaeological testing and monitoring are proposed to identify and appropriately manage any such discoveries.

Potential effects on the settings of archaeological monuments and protected structures have also been assessed. The assessment identifies some operational setting effects, generally ranging up to moderate, which will be reversible following the decommissioning of the turbines. No significant residual construction or decommissioning effects are assessed as likely following mitigation, and no likely significant cumulative heritage effects have been identified.

The Proposed Development is therefore considered to satisfactorily address the archaeological and built heritage considerations of DMS-109, subject to the implementation of the identified mitigation measures. Further details are provided in Chapter 11 of the EIAR, with associated landscape and visual considerations assessed in Chapter 10.

### *Electricity Infrastructure and Overhead Lines*

The Proposed Development has been designed having regard to existing electricity infrastructure and the technical requirements associated with turbine siting and grid connection.

In particular, as discussed in Chapter 2 of the accompanying EIAR, an alternative 4 no. turbine layout was considered but not progressed because the additional turbine was located close to an existing 400 kV overhead electricity line, presenting a technical constraint. The selected 3 no. turbine layout therefore reflects a consideration of the relationship between the proposed turbines and existing transmission infrastructure.

The Proposed Development includes an electrical switch room and associated on-site infrastructure. The approximately 5 km underground electricity line to the proposed Mullanafawnia 110 kV substation has been assessed in the EIAR but will be subject to a separate planning application.

The Proposed Development is considered to appropriately address the electricity infrastructure considerations of DMS-109, with detailed turbine selection and construction arrangements to comply with applicable technical and safety requirements. Further details are provided in Chapters 2, 3 and 14 of the EIAR and the

accompanying planning drawings.

### *Road Network and Access*

The Proposed Development will utilise access infrastructure permitted as part of Cush Wind Farm, including the construction entrance from the N62 and operational access from the L300321 local road. This approach limits the need for additional access infrastructure and allows the Proposed Development to benefit from previously assessed access arrangements.

The proposed turbine delivery haul route has been surveyed, and the necessary accommodation works have been identified. Construction traffic and abnormal-size load deliveries will be managed through a Traffic Management Plan to be submitted to the Planning Authority prior to the commencement of development, including coordination with relevant road authorities, traffic controls and measures to maintain local access.

The transport assessment concludes that, following mitigation, residual traffic and transport effects will be slight, negative and short-term, with no significant residual effects likely. The Proposed Development is therefore considered to satisfactorily address the road network and access requirements of DMS-109. Further details are provided in Chapter 14 of the EIAR and the Route Access Survey at Annex 3.5.

### *Radio Observatories and Communications*

The Proposed Development has been assessed with regard to existing telecommunications infrastructure and the potential for interference with radio and communications services, including the I-LOFAR radio telescope at Birr Castle. A specialist assessment has considered the potential effects on I-LOFAR, including turbine obstruction, reflection and equipment emissions, together with cumulative effects associated with Cush Wind Farm. The assessment concludes that the Proposed Development is not likely to have a significant effect on the radio telescope.

Consultation and coordination with relevant telecommunications operators will continue, including ESB Networks in respect of identified communications links. Arrangements are also proposed to investigate and remedy any television reception interference attributable to the Proposed Development.

Subject to these measures, no significant residual effects on telecommunications or I-LOFAR are likely. The Proposed Development is therefore considered to satisfactorily address the relevant communications considerations of DMS-109. Further details are provided in Chapter 14 of the EIAR and the specialist radio telescope assessment at Annex 14.2.

## **12.4 PEATLAND AFTER-USE**

As discussed in **Section 4.0** above, the Proposed Development is partially located on Galros Bog, an area of former industrial peatland which has historically been subject to commercial peat extraction by BnM. Following the cessation of industrial peat extraction, BnM is required to undertake the rehabilitation of the bog in accordance with its IPC licence obligations (ref. P0500-01).

The rehabilitation of Galros Bog is being progressed separately by BnM under its Galros Bog Draft Cutaway Bog Decommissioning and Rehabilitation Plan (2026) as part of the Peatlands Climate Action Scheme (PCAS). The Plan is included at Annex 6.2 of Volume II of the accompanying EIAR. The rehabilitation works do not form part of the Proposed Development. However, the Proposed Development has been designed having regard to the planned rehabilitation measures, and the interaction between the two activities has been fully assessed in the EIAR.

Within this context, Policies CAEP-16 and BLP-18 of the Offaly CDP are particularly relevant. Policy CAEP-16 recognises the potential of former industrial peatlands to accommodate a range of after-uses, including renewable energy development, biodiversity, amenity, flood management and climate mitigation. Policy BLP-18 supports an integrated approach to peatland management, incorporating rehabilitation, restoration and rewetting alongside appropriate developed after-uses.

Taken together, these policies establish a framework within which the rehabilitation of former industrial peatlands and appropriate renewable energy development may be considered as complementary activities, subject to the relevant environmental safeguards. They recognise that the future of former industrial peatlands need not be confined to a single use but may involve a combination of environmental rehabilitation and appropriate development, having regard to the characteristics and sensitivities of the lands concerned. The Proposed Development represents a renewable energy after-use of part of Galros Bog, where industrial peat production has ceased, and has been designed having regard to the separate rehabilitation of the wider bog.

BnM's Galros Bog Draft Cutaway Bog Decommissioning and Rehabilitation Plan (2026) identifies environmental stabilisation as its principal objective. The proposed rehabilitation measures include natural revegetation and targeted hydrological management, including drain blocking and rewetting where appropriate, to encourage the development of functioning cutaway peatland habitats. These measures are intended to improve the environmental condition of the bog, including its biodiversity, hydrology and carbon management.

The Applicant has engaged extensively with BnM during the development and design of the Proposed Development, particularly in relation to the interaction between the proposed wind farm infrastructure and the planned rehabilitation of Galros Bog. The Proposed Development has been designed in a fully integrated manner consistent with the rehabilitation plans for the bog. Section 3.1.3 ('Potential Future Land-Use') of BnM's Galros Bog Draft Cutaway Bog Decommissioning and Rehabilitation Plan (2026) expressly acknowledges the separate renewable energy proposal being advanced by Cush Wind Limited, comprising the 3 no. turbine extension to the permitted Cush Wind Farm and associated infrastructure, including the proposed underground electricity connection. The Plan also confirms that the Proposed Development is being advanced by the Applicant and does not constitute a BnM development. The rehabilitation plan has therefore been designed to take account of the proposed wind farm infrastructure.

The Proposed Development, including its wind farm layout, drainage design and peat management measures, has been developed having regard to the planned rehabilitation activities and the need to avoid interference with their implementation. Rehabilitation remains a separate activity undertaken by BnM and does not form part of the Proposed Development. The interaction between the two activities has nevertheless been fully considered in the EIAR, including relevant cumulative effects.

Objective CAEO-07 requires renewable energy projects located on or near peatlands to avoid negatively affecting rehabilitation measures, including drain blocking and rewetting. Policy CAEP-19 further requires development proposals on or immediately adjacent to peatlands to be accompanied by assessments of relevant matters, including peatland stability, hydrology, carbon emissions balance and ecological effects. These matters are addressed in the EIAR through the assessment of ground conditions, peat management, hydrology, ecology and the interaction with the planned rehabilitation works.

The permanent wind farm infrastructure footprint is approximately 2.3 ha, comprising approximately 2 ha of cutaway bog and 0.3 ha of agricultural land. This equates to approximately 2.7% of the site area. These figures relate to permanent above-surface physical infrastructure within the wind farm site. Sub-surface works will be appropriately reinstated.

Policy CAEP-18 is also relevant to the after-use of cutaway bog, particularly its provisions concerning amenity access and educational facilities associated with renewable energy development. The Proposed Development does not include an on-site amenity trail. However, as outlined in Chapter 4 of the EIAR, the Applicant has committed to working with the Planning Authority to increase amenity infrastructure and connectivity in the locality, subject to the availability of the necessary lands. The Community Consultation and Stakeholder Engagement Report, provided at Annex 1.8 of the EIAR, also records school outreach and renewable energy education initiatives.

Accordingly, the Proposed Development is considered to represent an appropriate renewable energy after-use of former industrial peatlands, with its design and environmental assessment fully integrated with the separate rehabilitation of Galros Bog and the relevant requirements of the Offaly CDP.

### 13.0 CONCLUSION

The preceding assessment demonstrates the strong policy support for the Proposed Development at European, national, regional and local levels. The delivery of additional renewable electricity generation is central to Ireland's climate action, decarbonisation and energy security objectives.

Notwithstanding progress in reducing greenhouse gas emissions, Ireland remains significantly off track to meet its statutory emissions reduction targets. The EPA's 2026 greenhouse gas emissions projections indicate that, even with the full implementation of additional planned policies and measures, Ireland could achieve an emissions reduction of only 25% by 2030 relative to 2018 levels, compared with the national target of 51%. This projected shortfall reinforces the importance of rapidly accelerating the delivery of renewable energy infrastructure alongside other measures necessary to achieve Ireland's climate objectives.

The Proposed Development would make a positive contribution to these objectives through the provision of 3 no. additional wind turbines with an estimated combined generating capacity of 18.3–21.6 MW. In considering the application, the following matters are particularly relevant:

- The Proposed Development would contribute to national and regional renewable electricity targets, greenhouse gas emissions reduction and energy security objectives, consistent with the policy framework at European, national, regional and local levels.
- The Eastern and Midland Regional Assembly has been allocated a target of 1,966 MW of additional onshore wind capacity by 2030. The Proposed Development would contribute approximately 0.9–1.1% of this additional capacity requirement. Together with the permitted Cush Wind Farm, the combined generating capacity would represent approximately 3.4–3.5% of the regional allocation, demonstrating the contribution that extensions to permitted wind farms can make towards achieving regional renewable energy targets.
- The site is located within an area designated as 'Areas Open for Consideration for Wind Energy Developments' under the Offaly County Wind Energy Strategy.

The area is characterised by favourable wind speeds, access to electricity infrastructure, a relatively flat landscape incorporating extensive former industrial peatlands and a dispersed pattern of rural housing. These characteristics, together with the established precedent for wind energy development in the locality, support the suitability of the site for the Proposed Development in accordance with the Wind Energy Development Guidelines for Planning Authorities (2006).

- The permitted Cush Wind Farm establishes the acceptability in principle of wind energy development at this location. The Proposed Development was identified during the earlier project design process for the permitted Cush Wind Farm as having potential to be progressed separately and has since been subject to further investigation, design refinement and environmental assessment.
- The Proposed Development has been designed to integrate with the permitted Cush Wind Farm, including the use of permitted access and construction infrastructure, thereby limiting the requirement for additional infrastructure and facilitating a coherent extension to the permitted development. This approach enables additional renewable electricity generating capacity to be delivered within an established wind energy development area, reducing the need to identify and develop alternative sites elsewhere to achieve an equivalent increase in capacity.
- The Proposed Development is partially located on Galros Bog, where industrial peat extraction has ceased. Its design has been informed by extensive engagement with BnM and has taken account of the separate rehabilitation proposals being advanced under its IPC licence obligations. The Proposed Development demonstrates how renewable energy generation can be designed in a fully integrated manner to coexist with the rehabilitation of former industrial peatlands, consistent with the relevant policies of the Offaly CDP. This presents an opportunity for complementary environmental and climate benefits: the recovery of peatland habitats and biodiversity through BnM's separate rehabilitation proposals, the potential restoration of peatland carbon sequestration functions over time, and the displacement of fossil fuel-based electricity generation through the production of renewable electricity.
- The accompanying EIAR and NIS assess the likely significant environmental effects of the Proposed Development and the wider Project, including cumulative effects with the permitted Cush Wind Farm and other relevant developments. The EIAR concludes that no significant residual environmental effects are likely, subject to implementation of the identified mitigation measures. The NIS similarly concludes that the Proposed Development will not adversely affect the integrity of any European site, either individually or in combination with other plans or projects, subject to implementation of the prescribed mitigation measures.
- The Proposed Development would generate construction and operational expenditure, contribute to the diversification of the local economy and provide additional funding for the community benefit and near-neighbour arrangements associated with Cush Wind Farm.

Taken together, the Proposed Development will deliver additional indigenous renewable electricity generation in a location identified as appropriate for consideration of wind energy development, adjoining an established permitted wind farm and making use of existing infrastructure, while taking account of the separate

rehabilitation of Galros Bog and the environmental sensitivities of the receiving environment. Accordingly, having regard to the applicable planning policy framework, the planning history of Cush Wind Farm and the findings of the accompanying EIAR and NIS, it is submitted that the Proposed Development accords with the proper planning and sustainable development of the area.



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