

ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR) FOR THE PROPOSED LITTLETON WIND FARM, CO. TIPPERARY

VOLUME 2 – MAIN EIAR

CHAPTER 2 – BACKGROUND TO THE PROPOSED DEVELOPMENT

Prepared for:

Littleton Wind Farm DAC



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2. BACKGROUND TO THE PROPOSED DEVELOPMENT

2.1 Introduction

This Chapter of the EIAR outlines the background to the Proposed Development, the planning history of the site, the consultation process undertaken prior to lodgement of this application along with the current International, National, Regional and Local policy (where relevant).

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

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

The location of the Proposed Development is shown in Figure 4.1, contained within Volume 4 of the EIAR. The general layouts of the Proposed Wind Farm, Grid Connection (GC) route and Turbine Delivery Route (TDR) are presented in Figures 4.2 to 4.4, Volume 4 of the EIAR.

A detailed description of the Proposed Development assessed in the EIAR is contained in Chapter 4, Volume 2 of the EIAR.

The proposed GC route, whilst assessed as part of this EIAR, will not form part of this planning application. If the Proposed Development is permitted, the GC route will be subject to a separate planning application.

2.1.1 EIAR Chapter Authors

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2.2 Historic Peat Extraction at Littleton and Lanespark Bogs

The development of the Application Site for peat extraction was intrinsically linked to the plans outlined in a government White Paper, which became known as the First Development Programme. Under Bord na Móna's Second Development Programme, drainage works, buildings and railway networks were established at the Application Site from 1941, with the commencement of peat extraction activities in 1952. Aerial imagery from 1973 confirms that the Application Site was subject to peat extraction prior to 1988.

Industrial-scale peat extraction ceased at the Application Site in 2017, and the Applicant formally announced in January 2021 that peat extraction across all its land holdings would permanently cease. With the cessation of peat extraction, the former peat production fields will naturally revegetate and evidence for this is already apparent within the Application Site. However, full revegetation will likely take some time and measures to aid the site rehabilitation are outlined in the bog specific Bord na Móna Cutaway Bog Decommissioning and Rehabilitation Plans (refer to Appendix 2.1, Volume 3, of EIAR).

The latest dates for the transposition of the EIA and Habitats Directives were 3rd July 1988 and 10th June 1994 respectively. These Directives do not purport to have retrospective effect, i.e., neither the EIA Directive nor the Habitats Directive apply to works undertaken prior to 1988 and 1994 respectively. As such, substitute consent is being sought (via separate application to ACP) to regularise the planning status of the Application Site for the period 1988 to the present day.

Drainage works commenced in 1941 at the Application Site at Littleton Bog, and in 1947 at Longfordpass Bog. The first peat extraction began at the Application Site in 1952 at Littleton and Longfordpass Bog in the form of sod peat. In 1968, the installation of drainage commenced at both Lanespark and Derryvella bogs, with aerial imagery of the Application Site showing that peat extraction had commenced by 1973. The increasing consumption of electricity in the post-war period led Bord na Móna in 1950 to provide for further increases in sod turf production and also introduced major targets for a more mechanised form of peat production - milled peat. Annual Report year ended 31st March 1952 shows that machine (sod) turf was produced at Littleton Bog. Expenditure on bog development work at Littleton (drainage, machines, buildings, engineering supplies, overhead expenses, lands) is also shown during the same financial year.

The Annual Report for the year ending 31st March 1964 further indicates that development works were expanded at Littleton Bog by acquiring additional acreage. BnM records indicate that approx. 3,534,355 tonnes (sod and milled combined) were extracted from the Application Site for the period 1952 to June 1988 inclusive. Milled peat extraction continued on the Application Site during the Peat Extraction Phase, and BnM records indicate that the total volume of peat extracted at the Application Site from 1988 to 2017 is estimated to be 5,117,798 tonnes.

Industrial scale peat extraction ceased at the Application Site in 2017. BnM formally announced in January 2021 that all industrial scale peat extraction on lands within its management would permanently cease in line with its on-going climate action programme and its transition to becoming a climate solutions company. As part of the decommissioning process, the process of transporting remaining peat stockpiles off the bogs commenced following the cessation of peat extraction in 2017. the removal of remaining peat stockpiles from the bogs. This was completed by mid-2019. The removal of rail infrastructure in Lanespark and Derryvella was completed in 2024.



Bord na Móna is currently the only operator licenced by the Environmental Protection Agency (EPA), as per Part IV of the Environmental Protection Agency Act 1992, to carry out the extraction of peat in an area exceeding 50 hectares. Bord na Móna was granted its Integrated Pollution Control Licence (IPC) Licence (Ref. P0499-01) from the EPA for the Littleton Bog Group, within which the Application Site is located, in addition to a number of other bogs located in Co. Tipperary in 2001. The EPA issues licences that contain conditions on how an activity must operate so as to protect the environment from pollution that might otherwise arise. The EPA Act, 1992 specifically prohibits the EPA from granting a licence if emissions from an activity would cause pollution.

The EPA has undertaken a Technical Amendments of the IPC licence on 25th September 2012 for the purpose of aligning the operational conditions of the licence to the objectives of National and European environmental protection legislation enacted over the lifetime of the licence. The current IPC Licence contains 15 no. conditions relating to operation and monitoring, emissions to water and air, water protection, waste management and bog rehabilitation. The IPC Licence is managed by the Bord na Móna's Environmental Management Department in Land and Habitats, with Compliance Officer managing the day-to-day compliance requirements.

As per Condition 2 (Management of the Activity) of the IPC Licence, Bord na Móna is required to maintain an Environmental Management System (EMS) which fulfils the requirements of the licence and any associated objectives / targets relating to use of cleaner technology, cleaner production and the reduction and minimisation of waste. The EMS is required to form part of the Annual Environmental Report (AER), which details Bord na Móna's annual record of compliance with the terms of its licence, which is generally submitted to the EPA prior to 31st of March of each year. AERs from 2018 to 2024 are available to view on the EPA's web portal) and have been submitted in compliance with the conditions set out within IPC Licence P0499-01. The EPA's online web facility provides further opportunities for the public to observe records relating to the on-going licenced operations and associated assessments (the public can also make observations/complaints directly to the EPA in relation to any licenced activities) The most recent AER submitted by Bord na Móna was the AER for 2025 and covers the 2024 calendar year.

Rehabilitation Phase 1 works commenced in Littleton, Longfordpass, Lanespark and Derryvella in 2018 with extensive drain-blocking and hydrological management. The key objective of peatland rehabilitation is environmental stabilisation. The rehabilitation works that have been completed and commenced in Phase 1 are described in the Cutaway Bog Decommissioning and Rehabilitation Plans (Appendix 2.1, Volume 3) and in Table 2.1 and 2.2 below. The Cutaway Bog Decommissioning and Rehabilitation Plans included in Appendix 2.1, Volume 3 provides a description of the four bogs and their ecology. It also provides a framework and outlines the typical works that is undertaken to achieve the aims of successful rehabilitation (the criteria for which are defined in the plan) and a timescale for when the various elements of the plans have been implemented or will likely be implemented. The remedial measures to be undertaken follow proven and standard procedures that have been successfully applied by Bord na Móna and are known to be effective as detailed below.

Drain Blocking

Drains have been blocked at the Application Site using a number of methods depending on the size and type of drain. These methods will include the following:

- Peat dams within small drainage channels on the cutover bog; and,
- Removal or blocking of drainage pipes, or modification of drainage levels, where required.

These methods are fully described in the Irish Wildlife Manual, Best Practice in Raised Bog Restoration in Ireland (Mackin et al, 2017).



Monitoring

As per the Cutaway Bog Decommissioning and Rehabilitation Plans, a programme of monitoring, aftercare and maintenance was implemented at the Application Site to validate the efficacy of the rehabilitation measures in achieving environmental stabilisation. These measures are detailed in the Cutaway Bog Decommissioning and Rehabilitation Plans as submitted to the EPA (Appendix 2.1, Volume 3). All surface and ground water monitoring has been submitted to the EPA as per licence requirements. Monitoring carried out at the Application Site assessed the general status of the site, the condition of the silt ponds, assess the condition of the rehabilitation work, monitoring of any potential impacts on neighbours land, general land security, boundary management, dumping and littering. Monitoring visits also considered any requirements for further practical rehabilitation measures. The baseline condition of the site has been established post-rehabilitation implementation by using an aerial survey to take an up-to-date aerial photos and this evaluation is presented in the Cutaway Bog Decommissioning and Rehabilitation Plans. These have been used to verify completion of rehabilitation measures.

Rehabilitation Phase 1 at Littleton, Longfordpass, Lanespark and Derryvella was completed between 2018-2021. Please see Tables 2.1 and 2.2 which detail the timeline and all the rehabilitation measures completed. (see Appendix 2.1, Volume 3 for further details regarding all Cutaway Bog Decommissioning and Rehabilitation Plans).

Table 2-1: Application Site Rehabilitation Programme Rehabilitation Phase 1 Summary((Littleton, Longfordpass) Please see Appendix 2.1 for more detail

	Longfordpass (2026 Plan)	Littleton (2026 Plan)
Completed Rehabilitation Measures	- A rehabilitation programme was carried out in Longfordpass between 2018-2021 (Rehabilitation Phase 1). These measures varied in intensity, were targeted in places and reflected the existing environmental conditions. - Some areas of bare peat had regular drain-blocking (Drain-blocking). - Some areas were subject to reducing or ceasing pumping (Hydrological management). - Some areas had minimal intervention as there were already re-vegetated and developing a mosaic of wetland, woodland and peatland habitats (Minimal intervention). - Some areas were allowed to continue to develop as wetland due to the natural breakdown of drainage and ceasing drain maintenance (Wetland).	- A rehabilitation programme was carried out in Littleton between 2018-2021 (Rehabilitation Phase 1). These measures varied in intensity, were targeted in places and reflected the existing environmental conditions. - Some areas of bare peat had regular drain-blocking (Drain-blocking). - Some areas were subject to reducing or ceasing pumping (Hydrological management). - Some areas had minimal intervention as there were already re-vegetated and developing a mosaic of wetland, woodland and peatland habitats (Minimal intervention). - Some areas were allowed to continue to develop as wetland due to the natural breakdown of drainage and ceasing drain maintenance (Wetland).



	Longfordpass (2026 Plan)	Littleton (2026 Plan)
	• Cutaway habitats are continuing to develop across Longfordpass Bog. Birch scrub and woodland has significantly expanded across the site on some of the drier, more elevated ground on the western side. • Pioneer vegetation is continuing to develop across the site and the bare peat cover is rapidly shrinking. • In general, cutaway habitats are developing according to the underlying environmental conditions and reflect the varying topography, hydrology and peat depths. • Part of the site north of the M8 has already re-vegetated, with pioneer vegetation maturing and developing a mosaic of typical cutaway habitats with Birch woodland predominating. Bare peat areas within the cutaway areas is limited. Natural re-colonisation of the cutaway so far has been effective. • All stock-piles have been removed from the site as part of the decommissioning phase of industrial peat production operations. • Other parts of the site (younger cutaway) are naturally colonising for > 10 years and are developing a mosaic of cutaway habitats. Natural re-colonisation of the cutaway so far has been quite effective. Bare peat areas within the cutaway parts of the site are shrinking as vegetation develops and consolidates.	• The majority of Littleton Bog is now vegetated or re-vegetating. Some sections have been developing as secondary habitats for a significant period of time (40 years). Birch woodland and scrub has significantly expanded across the site on some of the drier ground. • In general, cutaway habitats are developing according to the underlying environmental conditions and reflect the varying topography, hydrology and peat depths. • A significant part of the site has already re-vegetated, with pioneer vegetation maturing and developing a mosaic of typical cutaway peatland habitats with Birch woodland predominating. Bare peat areas within the older cutaway areas are limited. Natural re-colonisation of the cutaway so far has been quite effective.. • A portion of the site has already been developed as a conifer plantation by Coillte. • All stock-piles have been removed from the site as part of the decommissioning phase of industrial peat production operations. • Other parts of the site (younger cutaway) are naturally colonising for > 10 years and are developing a mosaic of cutaway habitats. Natural re-colonisation of the cutaway so far has been quite effective. Bare peat areas within the cutaway parts of the site are shrinking as vegetation develops and consolidates.



	Longfordpass (2026 Plan)	Littleton (2026 Plan)
Short-term Rehabilitation Measures 0-2 years (Ongoing)	• There will be ongoing monitoring of the site and appropriate rehabilitation planning related to any changes in land-use or proposed developments in the future at Longfordpass. • Silt-ponds will be monitored during this period and there will be continued maintenance and cleaning (if required) to prevent silt run-off from the site during the rehabilitation phase. Ongoing.	• There will be ongoing monitoring of the site and appropriate rehabilitation planning related to any changes in land-use or proposed developments in the future at Littleton. • Silt-ponds will be monitored during this period and there will be continued maintenance and cleaning (if required) to prevent silt run-off from the site during the rehabilitation phase. Ongoing.
Long-term Rehabilitation Measures (>5 years) (Ongoing)	• The effect of any targeted active management will be monitored and further work determined if required. • Monitoring of the site to ensure stabilisation and complete re-vegetation. • Evaluate success of short-term rehabilitation measures outlined above and enhance where necessary (to be determined by selected short-term management above). • Decommissioning of silt-ponds will be assessed. Ongoing. • Reporting to the EPA will continue until the site is deemed environmentally stable. • IPC License surrender process begins. To be commenced.	• The effect of any targeted active management will be monitored and further work determined if required. Ongoing. • Monitoring of the site to ensure stabilisation and complete re-vegetation. Ongoing. • Evaluate success of short-term rehabilitation measures outlined above and enhance where necessary (to be determined by selected short-term management above). Completed. • Decommissioning of silt-ponds will be assessed. Ongoing. • Reporting to the EPA will continue until the site is deemed environmentally stable. Ongoing. • IPC License surrender process begins. To be commenced.



Table 2-2: Rehabilitation Phase 1 Summary (Lanespark & Derryvella bog)

	Lanespark, Ballybeg, Derryvella (2025 Plan)
Completed & Ongoing Rehabilitation Measures (Phase 1)	• Previous rehabilitation was carried out in Ballybeg, Lanespark and Derryvella in 2018-2021 (Rehabilitation Phase 1). • Measures included wide-spread drain-blocking, berms, and hydrological management. A pump in Lanespark Bog was decommissioned. There was some fertiliser treatment in Derryvella Bog. • A significant part of the site has already re-vegetated, with significant cover of pioneer vegetation developing a mosaic of typical cutaway peatland and wetland habitats. The 2000 aerial photo shows that this side of the site was in peat extraction, with some emerging gravel mounds and ridges. By 2006 some areas were cutaway and peat extraction had stopped on a phased basis. Now there is a mosaic of pioneer habitats and the area has also been re-wetted, with wetlands developing in basins. • Natural re-colonisation of the cutaway so far has been effective. Bare peat areas within the cutaway are reducing as vegetation develops and consolidates. Areas of bare peat treated with fertiliser in Derryvella have also revegetated quite well.

2.2.2 Peatlands Climate Action Scheme (PCAS)

As part of Condition 10 of the IPC Licence (P0499-01), decommissioning and rehabilitation will be carried out as standard remedial measures associated with peat extraction and ancillary activities at the Site. In line with the BnM's accelerated decarbonisation strategy, and the availability of government funding, the company has also committed to ambitious enhanced peatland decommissioning, rehabilitation and restoration measures, targeting circa 33,000ha in over 80 no. Bord na Móna bogs. The nearby Ballybeg and Derryvella Bogs are intended to be part of PCAS.

This strategy has been developed to optimise ecosystem service benefits of peatland rehabilitation and restoration, particularly carbon storage and reducing carbon emissions. In addition, this will also benefit biodiversity and water (water quality and catchment management), as well as providing space for local communities and people to enjoy the outdoors.

Both the enhanced rehabilitation measures (PCAS) and the substitute consent are cumulatively assessed in this EIAR with the future remedial measures that will be carried out at the Application Site a part of the IPC Licence requirements under Condition 10 of the Licence.

2.2.3 Non-Peat Related Activities

2.2.3.1 *Commercial Forestry Activities*

Bord na Móna landholdings at Littleton Bog include approximately 800 acres of coniferous forestry that is managed exclusively by Coillte. Note that this is not within the site boundary.



2.2.4 Substitute Consent Application

BnM have applied concurrently for substitute consent to regularise, without prejudice, the planning status of peat extraction and ancillary activities within the Littleton, Longfordpass and Lanespark Bogs (as well as other Bogs part of this Bog group which are outside the area of Proposed Development).

The ACP Reference number for this is ACP-324359-26.

2.3 Subject Site Planning History

The table below presents a planning history of the subject site. This table was prepared by Fehily Timoney and Company (FT) based off the available online planning resources of Tipperary County Council and An Coimisiún Pleanála and dates back as far as the digital record extends. It presents a systematic review, first of the Application Site and Applications that have occurred within the redline boundary of same, before presenting Applications which adjoin this redline boundary, and lastly presenting Applications that have taken place within 500m of the redline boundary. This is in order to present a full, and thorough understanding of Development that has occurred both onsite and within the immediate environs.

This search was conducted in March 2026, and omits Applications deemed to be invalid or withdrawn by the local authority as these permissions are deemed as not being built out.

Table 2-3: Littleton Planning Search(within and c 500m of site boundary)

Reg Ref	Development Description	Status	Decision Date
On Site Applications (excluding grid connection as this does not form part of the redline boundary)			
ACP-324359-26.	Substitute Consent to regularise peat extraction and ancillary activities at Longfordpass Bog, Littleton Bog, Lanespark Bog and Derryvella Bog, Co. Tipperary.	Live Application	Live Application
20802	the erection of a guyed wind monitoring mast, with instruments, up to 100m in height - the purpose of the proposed mast is to assess the suitability of the company's adjacent lands for wind farm development	Granted	15-Sept-20
2560154	a recreational shared cycle and walkway to connect into the existing Loch Dhoire Bhile Loop - a) the delivery of a shared cycle and walkway on Bord na Móna lands. This will include the repurposing of 602 meters of existing former rail bed, 2859 meters along existing bog headlands / former high fields, and 721 meters along pre-existing machine access routes, b) the construction of car and / or bicycle parking facilities at a number of gateway locations along the proposed route and the provision of EV charging spaces at the gateway locations. This will include; i. 2 no. Type 2 Gateways, ii. 1 no. Type 4 Gateway, iii. 1 no. Minor Rest Points, c) Upgrade works to 1 no. local access road crossing and 4 no. agricultural access crossings, d) the erection of wayfinding and interpretative signage at Gateway locations along the route, e) the implementation of	Granted	18-Aug-25



Reg Ref	Development Description	Status	Decision Date
	Sustainable Drainage Systems (SuDS) nature-based drainage proposals at the Gateway locations to cater for surface water drainage at car park locations, f) fencing and screening will be erected where required for health and safety and biodiversity reasons which will include 2250 metres of screening and 1925 metres of boundary treatment fencing, g) all other ancillary and associated site work. This Planning Application is accompanied by a Natura Impact Statement (NIS)		
Reg Ref	Development Description	Status	Decision Date
Applications adjoining the sites redline boundary (excluding grid connection as this does not form part of the redline boundary)			
20976	(i) the erection of a roofed structure to the rear of the existing industrial shed, (ii) the erection of signage on existing screen wall to the front elevation	Granted	19-Oct-20
24178	an existing ESB substation and distribution room building and all associated site works	Granted	27-Sept-24
2561096	the construction of Two new buildings, ancillary to the existing light industrial building use on site. These will consist of Building A - a new warehouse (935 square metres), located to the rear of the site and, Building B - a new single storey office building (175 square metres) located to the front of the site, installation of new upgraded proprietary waste water treatment system with polishing filter together with all associated site works.	Further information requested on 19/12/25	11-Sept-17
12510172	(1) modifications to permitted develop. Ref. 09/51/0624 (ABP REF.PL.22.237958) Redesign of layout extent of racecourse to now cover c.33.6 ha; 18 hole golf course with relocation of individual holes as a result of revised racetrack design & assoc. builds; Relocation of permitted shared grandstand, entrance building, greyhound track, greyhound building, saddling stalls, weigh rooms buildings, stables, maintenance. builds, park. & assoc. support builds c.300m to south-east; Redesign of permitted grandstand to now include casino area & new weighing facilities in new basement level (c.3,963sq.m) & new sunken parade ring. Total floor area of build. is now c.36,841sq.m.; Redesign of permitted entrance. build. (c1,322sq.m. as per previous permitted build.); Permitted weigh-rooms build. to now be used for new jockey club & ancillary admin use; Redesign & relocation of permitted exhibit. area c.225m to the south-east with reduction in exhibit. floorspace by c.247sq.m (now 2,636sq.m); Change of permitted casino use within hotel to ancillary entertainment/conference uses; Relocation of	Granted	15/02/2013



Reg Ref	Development Description	Status	Decision Date
	permitted golf club house, driving range & assoc. park. c.300m to the south east; Relocate permitted chapel build. & park. c.140m to the northwest; Relocate permitted Hoban Memorial build. c.60m to nth & redesign of permitted formal gardens; Diversions/culverting of rivers/streams on site to accommodate revised develop; Redesign & relocate permitted car & coach park. areas across the site to now provide a total of 5731no. car park. spaces, 103no. bus park. spaces & 766no. horse/greyhound box park spaces; Redesign of internal road system & landscaping to incorp. the above revisions. (2) Replace permitted equestrian centre with larger equestrian centre complex (c.43,718sq.m) now located adjacent to the grandstand & greyhound track, comprising main equestrian centre build.(c.35,851sq.m), ancillary outdoor arenas & warm up areas, polo field, trailer park. stables (c.5232sq.m), judges boxes (c.273sq.m) cafe (c.325sq.m) & attendant facilities (c2037sq.m). All ancillary site devel. landscape & boundary treat. wks. The Gross Floor Area of the revised dev. is c.204,653 sq.m. This Application is accomanied. by an Environmental Impact Statement(EIS). A Waste Licence will be required in respect of this development		
Reg Ref	Development Description	Status	Decision Date
Applications within 500m of the site (excluding grid connection as this does not form part of the redline boundary)			
17600414	a new wastewater treatment system, re-alignment of boundaries to achieve sightlines for existing entrance, store/shed and all associated site works and retention permission for extension to existing dwelling and store/shed	Granted	11-Sept-17
17600902	two-storey dwelling, garage, septic tank and shared entrance	Granted	02-Jan-18
17600903	two-storey dwelling, garage, septic tank and shared entrance	Granted	02-Jan-18
17601086	removal of existing laneway, hedgerow, turning yard and entrance and to reinstate as agricultural land. Also for Permission to Retain alterations to and change of use of previously granted pump control building to agricultural store	Granted	23-Nov-17
18600062	construction of a slatted cubicle shed and all associated site works	Granted	15-Mar-18
18600705	construction of an animal house complete with underground slatted tank and associated site works	Granted	23-Oct-18



Reg Ref	Development Description	Status	Decision Date
19600714	a single storey dwellinghouse, garage, connection to public water scheme, effluent treatment system, percolation area, new site entrance and all associated ground works	Granted	15-Aug-19
19601231	construction of a livestock underpass with effluent holding tank and all associated site works	Granted	18-Dec-19
201152	a) An extension to existing attached domestic storage shed, b) An existing domestic storage shed/garage, c) elevational amendments to dwelling and attached domestic storage shed, d) a site entrance and all associated site works	Granted	22-Jun-21
21443	construction of 1) a slatted shed and 2) extension of existing silage slab and carry out all associated site works	Granted	27-May-21
2360145	a walled dungstead and all associated site works	Granted	24-Apr-23
2360767	a new two storey dwelling, garage house with garage, shared entrance, septic tank and percolation area with all associated siteworks	Granted	28-Mar-24
2461072	a new two storey dwelling, garage house with garage, shared entrance, septic tank and percolation area with all associated siteworks	Granted	11-Feb-25
2461108	a single storey 3 bedroomed house, splayed and recessed entranceway, secondary treatment system with soil polishing filter and all associated site works on and under land	Granted	18-Feb-25
2586	traditional style two-storey dwelling, domestic garage, septic tank and percolation area together with new site entrance and carry out all associated site works	Granted	10-Jul-25
2560682	construction of loose shed and all associated site works	Granted	09-Sept-25
5121910	Construction of two-storey dwellinghouse, separate garage, site entrance and septic tank system	Granted	21-Mar-00
5117925	Permission to retain extension and septic tank	Granted	08-June-96
04511361	Erect new agricultural entrance	Granted	29-Oct-04
02510766	Bungalow, septic tank, percolation area and entrance wall	Granted	19-Feb-03
5125017	Dwelling, entrance and septic tank.	Granted	12-June-02
5123515	Dwelling, entrance and septic tank	Granted	18-July-01
05510145	bungalow, site entrance, septic tank system and all associated site works	Granted	12-Apr-05
P36200	extension	Granted	19-July-79



Reg Ref	Development Description	Status	Decision Date
9671	extension of dwelling house	Granted	01-Apr-96
P34634	bungalow	Granted	08-Aug-77
P38718	prefab lock-up shop	Granted	29-Apr-83
03510098	Retention of single storey extension at rear of dwelling and permission to build a single storey extension to side of existing dwelling and re-roofing of existing dwelling.	Granted	20-Mar-03
16600399	(1) Slatted suckler cow shed with underground slurry storage tank & straw lie back area including calf creep area, covered feed passage & calving pens (2) a new cattle handling facility/crush (3) demolition of existing unused silage slab and (4) a new farm entrance and all other necessary associated site development works	Granted	17-June-16
5121978	Dwellinghouse, entrance and septic tank	Granted	29-Mar-00
04511186	extension to dwelling, garage, new boundary wall and associated site works	Granted	21-Sep-04
5122462	Erect 2 no. housing sites	Granted	14-July-00
04511879	Two dwellings and associated site works	Granted	21-Feb-05
13510347	dormer style dwelling, garage, entrance and septic tank	Granted	24-Apr-14
08510715	dormer style dwelling, garage, entrance and septic tank	Granted	26-Aug-08
06510925	to demolish existing dwelling, build dwelling, domestic garage, entrance, waste water treatment system and all associated site works	Granted	31-Aug-06
10510567	commercial well, pump house, shared entrance and access lane, turning area and all associated site works	Granted	23-05-2011



2.3.1 Cumulative Developments

A comprehensive review of cumulative developments considered included in Appendix 1.2 - Developments Considered for Cumulative Assessment of Volume 3 of this EIAR.

The geographic extent of the cumulative assessment relating to a Proposed Development is considered on a case-by-case basis, in line with the Guidelines for the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions (European Commission, 1999) and in accordance with best practice and guidance and the application of professional judgment and expertise.

2.4 Scoping and Consultation

Consultation is an important part of the Environmental Impact Assessment (EIA) process. This chapter describes the consultation process and EIAR scoping that was undertaken in order to identify key effects from the proposed Littleton Wind Farm to be included in the EIAR. The consultation process carried out for the proposed development has been a lengthy, detailed and thorough process. A number of points and submissions were raised as part of the consultation process which have informed the design of the proposed development and this EIAR.

This Section of Chapter 2 presents the key points that arose through the consultation process and how these points were addressed in the EIAR. The consultation process, scoping and the various pre-application consultations meetings with An Coimisiun Pleanála (previously An Bord Pleanála), Tipperary County Council and Kilkenny County Council, undertaken in respect of the proposed development are set out in this chapter. Following receipt of scoping responses, further consultation occurred with consultees as appropriate – for instance with the NPWS.

Throughout the consultation process, specific regard has been taken to the *Code of Practice for Wind Energy Development in Ireland – Guidelines for Community Engagement* published on the 21st of December 2016 by the Department of Communications, Climate Action and the Environment.

“This Code of Good Practice is intended to ensure that wind energy development in Ireland is undertaken in observance with the best industry practices, and with the full engagement of communities around the country”.

The applicant had regard throughout the pre-planning process of the practical steps that renewable energy promoters should comply with, in engaging with communities as set out in this Guidance. Please refer to Chapter 2.5 – Planning Policy of this EIAR Chapter for further discussion on this document, and the other legislation and guidelines considered throughout this Environmental Impact Assessment Report (EIAR).

2.4.1 Scoping and Pre-Planning Consultation

The purpose of the EIA scoping process is to identify the key points and issues which are likely to be important during the environmental impact assessment (EIA) of a project and to eliminate those that are not. The scoping process identifies sources or causes of potential environmental effects, the pathways by which the effects can happen, and the sensitive receptors which are likely to be affected. It defines the appropriate level of detail for the information to be provided in the EIAR. In essence, the primary focus of scoping is to define the most appropriate assessment of significant effects related to the proposed development.



A scoping request letter and scoping report detailing a description of the proposed development, draft mapping, preliminary table of contents of the EIAR and outline of the methodology for the assessment was distributed to consultees on the 17th September 2021, with a follow up issued to Kilkenny County Council and Tipperary County Council in 2023. A further scoping request was issued on the 8th May 2025. The recipients included, the Council, Government Departments, non-governmental organisations (NGOs), interested parties and key stakeholders. Consultees were invited to contribute to the EIAR by suggesting baseline data, survey methodologies and potential impacts that should be considered as part of the impact assessment process and in preparation of the EIAR.

Note that the telecommunications consultees listed here were also consulted by Ai Bridges in respect of Chapter 15: Material Assets, their responses are detailed in that chapter and its respective appendices.

Table 2.4 details the complete list of consultees who were issued a copy of the scoping document in 2021, and Table 2.5 shows the list of consultees who were issued a copy of the scoping document in 2025. Due to the change in name of certain consultees, and design progress, these lists differ slightly.

A copy of the scoping request letters and scoping reports are included as Appendix 2.2, Volume 3 of this EIAR.

Table 2-4: List of Consultees to whom the Scoping report was issued in 2021

Type of Stakeholder	Body / Department
The Councils	Tipperary County Council Kilkenny County Council
Regional Assembly	Southern Regional Assembly
Government Departments	Minister for Housing, Planning and Local Government Minister for Culture, Heritage and the Gaeltacht (DAU) Minister for Agriculture, Food and the Marine Minister for Communications, Climate Action and Environment Minister for Transport, Tourism and Sport Minister for Defence
NGOs and Stakeholders	An Bord Pleanála An Chomhairle Ealaíon (Arts Council) An Garda Síochána - Thurles Branch An Taisce Bat Conservation Ireland Biodiversity Ireland Birdwatch Ireland Butterfly Conservation Ireland Eirgrid Environmental Protection Agency (EPA) Environmental Sciences Association of Ireland ESB Networks Fáilte Ireland Forestry Service Gas Networks Ireland Geographical Society of Ireland



Type of Stakeholder	Body / Department
	Geological Survey Ireland (GSI) Health and Safety Authority Health Service Executive (HSE) Inland Fisheries Ireland (IFI) Irish Environmental Network Irish Peatland Conservation Council Irish Raptor Study Group Irish Water Irish Wildlife Trust Irish Wind Energy Association Met Eireann National Monuments Service National Parks and Wildlife Service (NPWS) National Roads Authority National Transport Authority Office of Public Works Office of Public Works (OPW) Southern Regional Assembly Sustainable Energy Authority Ireland Teagasc The Heritage Council Transport Infrastructure Ireland (TII)
Aviation	Irish Aviation Authority Kilkenny Airport
Telecommunications	Broadcasting Authority of Ireland (BAI) Eircom Ltd Electricity Supply Board Enet Telecommunications Networks Limited Imagine Networks Services Ltd IT Department, Laois County Council Meteor Mobile Communications Limited (Eir) Nova Networks Ltd Ripple Communications Ltd RTE Transmission Network Ltd RTÉ/Saorview Telecommunications Section, An Garda Síochána Three Ireland (Hutchison) Limited Viatel Ireland Ltd Virgin Media Ireland Ltd (PP) Vodafone Ireland Ltd



Type of Stakeholder	Body / Department
Other – to inform	Commission for Regulation of Utilities Commission for Communications Regulation

Table 2-5: List of Consultees to whom the scoping Report was issued in 2025

Type of Stakeholder	Body / Department
The Councils	Tipperary County Council Kilkenny County Council
Regional Assembly	Southern Regional Assembly
Government Departments	Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media Department of Environment, Climate & Communications Department of Housing, Local Government & Heritage Department of Agriculture, Food and the Marine Department of Transport Department of Defence
NGOs and Stakeholders	Inland Fisheries Ireland (IFI) Transport Infrastructure Ireland (TII) Environmental Protection Agency (EPA) The Heritage Council An Taisce An Chomhairle Ealaíon (Arts Council) Fáilte Ireland Office of Public Works Health and Safety Authority Irish Water An Garda Síochána - Thurles Branch Bat Conservation Ireland Biodiversity Ireland Birdwatch Ireland Butterfly Conservation Ireland Eirgrid Environmental Sciences Association of Ireland ESB Networks Forestry Service Gas Networks Ireland Geographical Society of Ireland Geological Survey Ireland (GSI) Health Service Executive (HSE) Irish Environmental Network



Type of Stakeholder	Body / Department
	Irish Peatland Conservation Council Irish Raptor Study Group Irish Wildlife Trust Irish Wind Energy Association Met Eireann National Monuments Service National Parks and Wildlife Service (NPWS) National Transport Authority Sustainable Energy Authority Ireland Teagasc
Aviation	Irish Aviation Authority Kilkenny Airport AirNav (following response from Irish Aviation Authority)
Telecommunications	Coimisúin na Meán Eir Eircom ESB Telecoms Enet Telecommunication's Network Limited Imagine Nova Telecom RTE Transmission Network (2RN) / Saorview Telecommunication's Section, An Garda Síochána Three Viatel Ireland Ltd Virgin Media Ireland Vodafone
Other – to inform	Commission for Regulation of Utilities Commission for Communications Regulation



2.4.2 List of Scoping Responses

Full details of the scoping responses received are set out at Appendix 2.2, Volume 3 of this EIAR. A summary of the consultation responses received in the 2021 round of scoping are presented in Table 2.6 and in the 2025 round of scoping are presented in Table 2.7.

Table 2-6: 2021 Scoping Response

	Consultee	Date of response	Response / Key Points Raised	Chapter of EIAR where Key Points Raised are Addressed
County Councils	Tipperary County Council	17/09/2021	Acknowledged receipt of email. Refer to Section 2.4.4.1 for a breakdown of Local Authority pre-planning consultation.	N/A
	Kilkenny County Council	N/A	N/A	
	Laois County Council	17/09/2021	Acknowledged receipt of email. Note that this was issued from a telecommunications point of view due to proximity of site to County Laois.	N/A
Regional Assembly	Southern Regional Assembly	17/09/2021	Acknowledged receipt of email.	N/A
Government Departments	Minister for Housing, Planning and Local Government	N/A	No response received.	N/A



	Consultee	Date of response	Response / Key Points Raised	Chapter of EIA where Key Points Raised are Addressed
	Minister for Culture, Heritage and the Gaeltacht (DAU)	17/09/2021	Acknowledged receipt of email and noted that co-ordinated heritage response would be received from Development Applications Unit if any observations arose.	N/A
	Minister for Agriculture, Food and the Marine	N/A	No response received.	N/A
	Minister for Communications, Climate Action and Environment	17/09/2021	Acknowledged receipt of email.	N/A
	Minister for Transport, Tourism and Sport	19/10/2021	Outlined a number of items to consider. Refer to Section 2.4.3 for more information.	N/A
	Minister for Defence	N/A	No response received.	N/A
NGOs and Stakeholders	An Bord Pleanála	N/A	No response received.	N/A
	An Chomhairle Ealaíon (Arts Council)	N/A	No response received.	N/A
	An Garda Síochána - Thurles Branch	N/A	No response received.	N/A



	Consultee	Date of response	Response / Key Points Raised	Chapter of EIA where Key Points Raised are Addressed
	An Taisce	N/A	No response received.	N/A
	Bat Conservation Ireland	N/A	No response received.	N/A
	Biodiversity Ireland	17/09/2021	Noted no capacity to reply.	Chapter 5.
	Birdwatch Ireland	N/A	No response received.	N/A
	Butterfly Conservation Ireland	N/A	No response received.	N/A
	Eirgrid	20/09/2021	No comments to make.	N/A
	Environmental Protection Agency (EPA)	24/09/2021	Acknowledged receipt of email.	N/A
	Environmental Sciences Association of Ireland	N/A	No response received.	N/A
	ESB Networks	17/09/2021	Acknowledged receipt of email .	N/A
	Fáilte Ireland	12/10/2021	Provided a copy of Fáilte Ireland Guidelines for the Treatment of Tourism in an EIA	Chapter 5 – Population and Human Health
	Forestry Service	N/A	No response received.	N/A



	Consultee	Date of response	Response / Key Points Raised	Chapter of EIA where Key Points Raised are Addressed
	Gas Networks Ireland	17/09/2021	Acknowledged receipt of email.	N/A
	Geographical Society of Ireland	N/A	No response received.	N/A
	Geological Survey Ireland (GSI)	02/11/2021	Provided a detailed response. Refer to Section 2.4.3.2 for more detail.	Chapters 8 and 9.
	Health and Safety Authority	N/A	No response received.	N/A
	Health Service Executive (HSE)	N/A	No response received.	N/A
	Inland Fisheries Ireland (IFI)	N/A	No response received.	N/A
	Irish Environmental Network	N/A	No response received.	N/A
	Irish Peatland Conservation Council	N/A	No response received.	N/A
	Irish Raptor Study Group	N/A	No response received.	N/A
	Irish Water	17/09/2021	Provided a number of comments. Please refer to Section 2.4.3.3 for more detail.	Chapter 9
	Irish Wildlife Trust	17/09/2021	Noted no capacity to respond.	N/A



	Consultee	Date of response	Response / Key Points Raised	Chapter of EIA where Key Points Raised are Addressed
	Irish Wind Energy Association	N/A	No response received.	N/A
	Met Eireann	17/09/2021	Acknowledgement of receipt of email.	N/A
	National Monuments Service	N/A	No response received.	N/A
	National Parks and Wildlife Service (NPWS)	02/11/2021	Noted a number of items for consideration. Refer to Section 2.4.6 below for summary.	Chapter 6: Biodiversity.
	National Roads Authority	N/A	No response received.	N/A
	National Transport Authority	17/09/2021	Acknowledged receipt of email.	N/A
	Office of Public Works (OPW)	N/A	No response received.	N/A
	Sustainable Energy Authority Ireland	17/09/2021	Acknowledged receipt of email.	N/A
	Teagasc	N/A	No response received.	N/A
	The Heritage Council	N/A	No response received.	N/A
	Transport Infrastructure Ireland (TII)	20/09/2021	Provided a number of comments. Refer to Section 2.4.3.4.	Chapter 15



	Consultee	Date of response	Response / Key Points Raised	Chapter of EIAR where Key Points Raised are Addressed
Aviation	Irish Aviation Authority	30/09/2021	Noted the following: <i>The development appears to be approximately 22kms West of Kilkenny Airport, as such, it is likely that the following general observations would be proffered during a formal planning process: In the event of planning consent being granted, the applicant should be conditioned to contact the Irish Aviation Authority to: (1) agree an aeronautical obstacle warning light scheme for the wind farm development, (2) provide as constructed coordinates in WGS84 format together with ground and blade tip height elevations at each wind turbine location and (3) notify the Authority of intention to commence crane operations with at least 30 days prior notification of their erection.</i>	Chapter 15.



	Consultee	Date of response	Response / Key Points Raised	Chapter of EIAR where Key Points Raised are Addressed
	Kilkenny Airport	N/A	No response received.	N/A
Telecommunications	Broadcasting Authority of Ireland (BAI)	17/09/2021	Noted: <i>The BAI does not perform an in-depth analysis of the effect of wind turbines on FM networks. However, we are not aware of any issues from existing windfarms into existing FM networks. Also, the proposed windfarms are not located close to any existing or planned FM transmission sites.</i>	Chapter 15.
	Eircom	N/A	No response received.	N/A
	ESB Telecoms	N/A	No response received.	N/A
	Enet Telecommunication's Network Limited	08/11/2023	Noted no links affected.	Chapter 15
	Imagine	27/09/2021	Acknowledged receipt of email.	N/A



	Consultee	Date of response	Response / Key Points Raised	Chapter of EIA where Key Points Raised are Addressed
	Meteor Mobile Telecommunications Limited (Eir)	N/A	No response received.	N/A
	NovaNetworks Limited	N/A	No response received.	N/A
	Ripple Communications Ltd	N/A	No response received.	N/A
	RTE Transmission Network Ltd	N/A	No response received.	N/A
	RTE/Saorview	N/A	No response received.	N/A
	Telecommunication Section, An Garda Síochána	N/A	No response received.	N/A
	Three	N/A	No response received.	N/A
	Viatel Ireland Ltd	N/A	No response received.	N/A
	Virgin Media Ireland	29/09/2021	Confirmed no links in the area.	N/A



	Consultee	Date of response	Response / Key Points Raised	Chapter of EIAR where Key Points Raised are Addressed
	Vodafone	20/09/2021	Noted that there are two Vodafone links that pass through the site. TY117-TYGCL and TYLSF-TYGCL. Co-ordinates provided below. A clearance of 30m from the first Fresnel zone is desired	Chapter 15
Other – to inform	Commission for Regulation of Utilities	N/A	No response received.	N/A
	Commission for Communications Regulation	08/05/2025	Email acknowledged.	N/A



Table 2-7: 2025 Scoping Responses

	Consultee	Date of response	Response / Key Points Raised	Chapter of EIAR where Key Points Raised are Addressed
County Councils	Tipperary County Council	09/05/2025	Acknowledged receipt of email. Refer to Section 2.4.4.1 for a breakdown of Local Authority pre-planning consultation.	N/A
	Kilkenny County Council	N/A	N/A. Refer to Section 2.4.4.1 for a breakdown of Local Authority pre-planning consultation.	N/A
Regional Assembly	Southern Regional Assembly	N/A	No response received.	N/A
Government Departments	Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media	N/A	No response received.	N/A
	Department of Environment, Climate & Communications	N/A	No response received.	N/A
	Department of Housing, Local Government & Heritage	N/A	No response received.	N/A



	Consultee	Date of response	Response / Key Points Raised	Chapter of EIA where Key Points Raised are Addressed
	Department of Agriculture, Food and the Marine	N/A	No response received.	N/A
	Department of Transport	N/A	No response received.	N/A
	Department of Defence	N/A	No response received.	N/A
NGOs and Stakeholders	Inland Fisheries Ireland (IFI)	N/A	No response received.	N/A
	Transport Infrastructure Ireland (TII)	N/A	No response received.	N/A
	Environmental Protection Agency (EPA)	08/05/2025	Acknowledged email.	
	The Heritage Council	N/A	No response received.	N/A
	An Taisce	N/A	No response received.	N/A
	An Chomhairle Ealaíon (Arts Council)	08/05/2025	Acknowledged email.	N/A
	Faite Ireland	28/05/2025	Did not raise any issues, but referred back to enhancement of visitor experience in the Midlands.	Chapter 5.
	Office of Public Works	N/A	No response received.	N/A



	Consultee	Date of response	Response / Key Points Raised	Chapter of EIA where Key Points Raised are Addressed
	Health and Safety Authority	N/A	No response received.	N/A
	Irish Water (Uisce Eireann)	N/A	No response received.	N/A
	An Garda Síochána - Thurles	N/A	No response received.	N/A
	Bat Conservation Ireland	12/05/2025	Not in a position to comment.	N/A
	Biodiversity Ireland	N/A	No response received.	N/A
	Birdwatch Ireland	N/A	No response received.	N/A
	Butterfly Conservation Ireland	N/A	No response received.	N/A
	EirGrid	08/05/2025	Email acknowledged.	N/A
	Environmental Sciences Association of Ireland	N/A	No response received.	N/A
	ESB Networks	08/05/2025	Acknowledged.	N/A
	Forestry Service	N/A	No response received.	N/A
	Gas Networks Ireland	21/05/2025	No issues raised.	N/A
	Geographical Society of Ireland	N/A	No response received.	N/A



	Consultee	Date of response	Response / Key Points Raised	Chapter of EIA where Key Points Raised are Addressed
	Geological Survey Ireland (GSI)	N/A	No response received.	N/A
	Health Service Executive (HSE)	N/A	No response received.	N/A
	Irish Environmental Network	N/	No response received.	N/A
	Irish Peatland Conservation Council	N/A	No response received.	N/A
	Irish Raptor Study Group	N/A	No response received.	N/A
	Irish Wildlife Trust	N/A	No response received.	N/A
	Irish Wind Energy Association	N/A	No response received.	N/A



	Consultee	Date of response	Response / Key Points Raised	Chapter of EIA where Key Points Raised are Addressed
	Met Eireann	08/05/2025	Acknowledgement of email.	N/A
	National Monuments Service	N/A	No response received.	N/A
	National Parks and Wildlife Service (NPWS)	N/A	No response received. Refer to Section 2.4.5 for discussion re. NPWS consultations.	N/A
	National Transport Authority	N/A	No response received.	N/A
	Sustainable Energy Authority Ireland	N/A	No response received.	N/A
	Teagasc	N/A	No response received.	N/A



	Consultee	Date of response	Response / Key Points Raised	Chapter of EIAR where Key Points Raised are Addressed
Aviation	Irish Aviation Authority	12/05/2025	Advised engage with Department of Defence and Air Nav Ireland. Also noted: <i>“It is likely that the following general observations would be proffered by the Authority during a formal planning process: In the event of planning consent being granted, the applicant should be conditioned to contact the Irish Aviation Authority to: (1) agree an aeronautical obstacle warning light scheme for the wind farm development, (2) provide as-constructed coordinates in WGS84 format together with ground and blade tip height elevations at each wind turbine location and (3) notify the Authority of intention to commence crane operations with at least 30 days prior notification of their erection in accordance with S.I. 215 of 2005 Irish Aviation Authority (Obstacles to Aircraft In Flight) Order.”</i>	Chapter 15.



	Consultee	Date of response	Response / Key Points Raised	Chapter of EIAR where Key Points Raised are Addressed
Telecommunications	Kilkenny Airport	N/A	No response received.	N/A
	AirNav (following response from Irish Aviation Authority)	N/A	No response received.	N/A
	Coimisiún na Meán	08/05/2025	<i>“Coimisiún na Meán does not perform an in-depth analysis of the effect of wind turbines or electrical sub stations on FM networks. However, we are not aware of any issues from existing windfarms or electrical sub stations into existing FM networks. Also, the proposed sub station is not located close to any existing or planned FM transmission sites.”</i>	N/A
	Eir	08/05/2025	Four links traversing the area, these will need a buffer zone around them to be avoided.	Chapter 15.
	Eircom	N/A	No response received.	N/A



	Consultee	Date of response	Response / Key Points Raised	Chapter of EIA where Key Points Raised are Addressed
	ESB Telecoms	N/A	No response received.	N/A
	Enet Telecommunication's Network Limited		Two links affected.	Chapter 15
	Imagine	09/05/2025	Confirmed no issues.	N/A
	Nova Telecom	N/A	No response received.	N/A
	RTE Transmission Network (2RN) / Saorview	08/05/2025	No issues regarding transmission links; however, 2RN have requested that a protocol document be signed should the wind farm go ahead (regarding the TV broadcast service in the area).	Chapter 15.
	Telecommunication Section, An Garda Síochána	N/A	No response received.	N/A
	Three		Three Ireland raised a concern regarding three Licensed PTP microwave radio links.	Feedback has been considered within Chapter 15: Material Assets, Telecommunications and Aviation
	Viatel Ireland Ltd	08/05/2025	Confirmed no impact on Viatel network.	N/A



	Consultee	Date of response	Response / Key Points Raised	Chapter of EIAR where Key Points Raised are Addressed
Other – to inform	Virgin Media Ireland	N/A	No response received.	N/A
	Vodafone	N/A	No response received.	N/A
	Commission for Regulation of Utilities	N/A	No response received.	N/A
	Commission for Communications Regulation	08/05/2025	Email acknowledged.	N/A



2.4.3 Key Issues Raised During the Scoping Process

2.4.3.1 *Department of Transport*

In their EIA Scoping response dated 19 October 2021, the Department of Transport stated the following:

“Where the developer proposes the placement of any cables (or additional cables) in one or more trenches within the extents of the (regional and local) public road network, it is necessary to consider the following:

- Their presence within the public road could significantly restrict the Road Authority in carrying out its function to construct and maintain the public road and will likely add to the costs of those works.*
- Their installation within the lands associated with the public road may affect the stability of the road. In particular where the road is a “legacy road” (where there is no designed road structure and the subgrade may be poor or poorly drained) the design needs to take account of all the variable conditions and not be based on a sample of the general conditions.*
- The possible effect on the remaining available road space (noting that there may be need to accommodate other utilities within the road cross-section in the future).*

The Department considers it important that the examination of the proposal should include consideration of the following:

- Examination of options other than the routing of cables along the public road,*
- Examination of options for connection to the national grid network at a point closer to the wind farm so as to reduce the adverse impact on public roads.*
- Details of where within the road cross section cables are to be placed so as to minimise the effect on the Roads Authority in its role of construction and maintenance.*
- Examination of details of any chambers proposed within the public road cross section so as to minimise the effect on the Roads Authority in its role of construction and maintenance, and.*
- Rationalisation of the number of cables involved (including existing electric or possible future cables) and their diversion into one trench, in order to minimise the impacts on the road network and the environment along the road boundary (hedgerows).”*

Applicants Response

Please refer to Chapter 15, Material Assets which deals with the content of this submission.



2.4.3.2 Geological Survey Ireland

The Geological Survey Ireland (GSI) response to EIA Scoping dated 2 November 2021 noted a number of points relating to geology.

GSI note that Littleton Bog County Geological Sites (CGSs) is located in the vicinity of the proposed Littleton Wind Farm.

They also highlighted the need to consider any potential impact on groundwater abstractions and groundwater resources.

Applicants Response

The potential effects on the integrity of these CGS are presented in Chapter 8, Lands Soils and Geology of this EIAR.

All groundwater abstractions have been identified in Chapter 9, Hydrology, Hydrogeology and Water Quality, in particular Section 9.3.15. The potential effects on public and group supplies are presented in Section 9.4.2.1.10 and potential effects on private groundwater well supplies are presented in Section 9.4.2.1.11.

2.4.3.3 Uisce Eireann

Uisce Eireann, formerly Irish Water, provided a response to scoping dated 17 September 2021.

This raised a number of specific items relating to the scope of water services for the proposed Littleton Wind Farm, these are listed below:

“IW currently does not have the capacity to advise on scoping of individual projects. However, in general we would like the following aspects of Water Services to be considered in the scope of an EIAR where relevant;

a) Where the development proposal has the potential to impact an IW Drinking Water Source the applicant shall provide details of measures to be taken to ensure that there will be no negative impact to IWs Drinking Water Source during construction and operational phases of the development. It is a requirement of the Water Framework Directive that waters used for the abstraction of drinking water are protected so as to avoid deterioration in quality.

b) The waste sampling strategy for the proposed development to ensure the material is inert.

c) Mitigation proposed for any potential negative impacts on any water source(s), in proximity including the environmental management plan and incident response.

d) Any and all potential impacts on the nearby reservoir as public water supply water source is assessed, including any impact on hydrogeology and any groundwater/ surface water interactions.

e) Impacts of the development on the capacity of water services (do existing water services have the capacity to cater for the new development if required). This is confirmed by IW in the form of a Confirmation of Feasibility (COF). If a development will require a connection to either a public water supply or sewage collection system the developer is advised to submit a Pre Connection Enquiry (PCE) enquiry to IW to determine the feasibility of connection to the Irish Water network. All pre-connection enquiry forms are available from <https://www.water.ie/connections/get-connected/>



- f) Any up-grading of water services infrastructure that would be required to accommodate the development.*
- g) In relation to a development that would discharge trade effluent – any upstream treatment or attenuation of discharges required prior to discharging to an IW collection network*
- h) In relation to the management of surface water; the potential impact of surface water discharges to combined sewer networks & potential measures to minimise/stop surface waters from combined sewers*
- i) Any physical impact on IW assets – reservoir, drinking water source, treatment works, pipes, pumping stations, discharges outfalls etc. including any relocation of assets*
- j) If you are considering a development proposal, it is best practice to contact us in advance of designing your proposal to determine the location of public water services assets. Details, where known, can be obtained by emailing an Ordinance Survey map identifying the proposed location of your intended development to datarequests@water.ie. Other indicators or methodologies for identifying infrastructure located within your lands are the presence of registered wayleave agreements, visible manholes, vent stacks, valve chambers, marker posts etc. within the proposed site.*
- k) Any potential impacts on the assimilative capacity of receiving waters in relation to IW discharge outfalls including changes in dispersion /circulation characterises*
- l) Any potential impact on the contributing catchment of water sources either in terms of water abstraction for the development (and resultant potential impact on the capacity of the source) or the potential of the development to influence/ present a risk to the quality of the water abstracted by IW for public supply.*
- m) Where a development proposes to connect to an IW network and that network either abstracts water from or discharges waste water to a “protected”/ sensitive area, consideration as to whether the integrity of the site/conservation objectives of the site would be compromised.*
- n) Mitigation measures in relation to any of the above ensuring zero risk to any IW drinking water sources (Surface and Ground water).”*

Applicants Response

From the outset we would highlight that there is no connection required to Uisce Eireann infrastructure, and that accordingly no upgrading of water services infrastructure is required.

Please refer to Section 9.2.3 of Chapter 9, Hydrology, Hydrogeology and Water Quality which provides a full response to this submission.

2.4.3.4 TII

In their response to the EIA Scoping dated 20 September 2021, TII stated the following:

“With respect to EIAR scoping issues, the recommendations indicated below provide only general guidance for the preparation of an EIAR, which may affect the national road network.



“The developer/scheme promoter should have regard, inter alia, to the following:

TII notes that the subject site appears to access the local/regional road in the first instance. However, proximity to the M8 Motorway, national road, is noted. Consultations should be had with the relevant Local Authority/National Roads Design Office with regard to locations of existing and future national road schemes.

TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the proposed development; M8 Motorway, national primary road, and N62 and N75, national secondary roads. Sufficient set-back from motorway/national roads for turbine sting shall be provided.

The developer should assess visual impacts from existing national roads.

The developer should have regard to any EIAR/EIS and all conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the area. The developer should in particular have regard to any potential cumulative impacts.

The developer, in preparing EIAR, should have regard to TII Publications (formerly DMRB and the Manual of Contract Documents for Road Works).

The developer, in preparing EIAR, should have regard to TII’s Environmental Assessment and Construction Guidelines, including the Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes (National Roads Authority, 2006).

The EIAR/EIS should consider the Environmental Noise Regulations 2006 (SI 140 of 2006) and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see Guidelines for the Treatment of Noise and Vibration in National Road Schemes (1st Rev., National Roads Authority, 2004)).

It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site with reference to impacts on the national road network and junctions of lower category roads with national roads. In relation to national roads, TII’s Traffic and Transport Assessment Guidelines (2014) should be referred to in relation to proposed development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of the NRA/TII TTA Guidelines which addresses requirements for sub-threshold TTA. Any improvements required to facilitate development should be identified. It will be the responsibility of the developer to pay for the costs of any improvements to national roads to facilitate the private development proposed, as TII will not be responsible for such costs.

The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required.

In the interests of maintaining the safety and standard of the national road network, the EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network.



TII recommends that that applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. Where abnormal 'weight' loads are proposed, separate structure approvals/permits and other licences may be required in connection with the proposed haul route and all structures on the haul route through all the relevant County Council administrative areas should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal 'weight' load proposed.

The national road network is managed by a combination of PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities in association with TII. The applicant/developer should also consult with all PPP Companies, MMaRC Contractors and road authorities over which the haul route traverses to ascertain any operational requirements such as delivery timetabling, etc. and to ensure that the strategic function of the national road network is safeguarded.

Additionally, any damage caused to the pavement on the existing national road arising from any temporary works due to the turning movement of abnormal 'length' loads (e.g., tearing of the surface course, etc.) shall be rectified in accordance with TII Pavement Standards and details in this regard shall be agreed with the Road Authority prior to the commencement of any development on site.

Grid connection and cable routing proposals should be developed to safeguard proposed road schemes as TII will not be responsible for costs associated with future relocation of cable routing where proposals are catered for in an area of a proposed national road scheme. In that regard, consideration should be given to routing options, use of existing crossings, depth of cable laying, etc.

In the context of the existing national road network, in accordance with the National Planning Framework National Strategic Outcome no. 2 'Enhanced Regional Accessibility', there is a requirement to maintain the strategic capacity and safety of the network. This requirement is further reflected in the National Development Plan, the recent publication of the Draft National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

There is around 99,000km of roads in Ireland, the national road network which caters for strategic inter-urban travel consists of only approx. 5.4% of this. There is a critical requirement to ensure the strategic capacity and safety of this national road network is maintained and significant Government investment already made in the national road network is safeguarded.

The provision of cabling along the national road network represents a number of significant implications for TII and road authorities in the management and maintenance of the strategic national road network and TII is of the opinion that grid connection cable routing should reflect the foregoing provisions of official policy. Therefore, TII advises that grid connection cable routing should seek to utilise available alternatives, as opposed to the strategic national road network contrary to the provisions of official policy.

Other consents or licences may be required from the road authority for any trenching or cabling proposals crossing the national road. TII requests referral of all proposals agreed and licensed between the road authority and the applicant which affect the national road network.



Cable routing should avoid all impacts to existing TII infrastructure such as traffic counters, weather stations, etc. and works required to such infrastructure shall only be undertaken in consultation with and subject to the agreement of TII, any costs attributable shall be borne by the applicant/developer. The developer should also be aware that separate approvals may be required for works traversing the national road network.”

Applicants Response

Please refer to Chapter 15, Material Assets which deals with the content of this submission.

2.4.4 Local Authority Pre-Application Consultations

2.4.4.1 Tipperary County Council

A total of two pre-planning consultation meetings have been held with Tipperary County Council, on the following dates:

- First Meeting – 8th December 2021
- Second Meeting – 10th September 2025

The main considerations which were derived from these meetings are outlined in bullet points below:

- How the proposed development will interact with adjacent existing and permitted amenity trails, including parking for same.
- Concerns raised re. inclusion of grid connection cables in the public roadway.
- Queries re. the community engagement process.
- Nature based solutions to be implemented with regard to drainage and hydrology.
- Clarifications re. turbine layout and dimensions.

Applicants Response

These comments have been addressed throughout this EIAR. In particular,

- Chapter 4 – Description of the Proposed Development
- Chapter 15 – Material Assets
- Chapter 2 – Background to the Proposed Development
- Chapter 9 - Hydrology, Hydrogeology and Water Quality



2.4.4.2 *Kilkenny County Council*

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

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

2.4.5 SID Pre-Application Process with An Coimisiun Pleanála – Ref. ACP Ref. 311587-21

Two pre-application meetings were held with An Coimisiun Pleanála under Section 37B of the Planning and Development Act 2000 as amended. These meetings were conducted on the following dates:

- First Meeting: 15 February 2022
- Second Meeting: 1st December 2025

Copies of the meeting minutes are included in Appendix 2.4.

Ahead of the formal submission of the SID Application to An Coimisiun Pleanála, the SID Pre-Application process was formally closed out on 24 March 2026 (SID Pre-application case ref. ABP- 311587-21). A Copy of ACP Close Out Letter is included at Appendix 2.4.

Applicants Response

In line with the discussions and feedback received from ACP since February 2022, the elements of the proposal are clearly evidenced through the EIAR. In particular, Chapter 4 – Description of the Proposed Development has sought to provide a detailed description of what the proposal will entail, and clearly depicting the mitigation and enhancement measures to be put in place as part of this proposal.

2.4.6 NPWS Consultation – Ref G Pre00244/2021 and G Pre00401/2025

The initial response received from the NPWS was received on 2 November 2021. This provided a number of recommendations to be considered as the proposed wind farm application material was prepared.

A follow up submission was issued by FT dated 22 November 2023.

The NPWS were included in the additional round of scoping issued 8 May 2025.



The response advised on best-practice assessment approaches and key areas to cover in relation to nature conservation in order to prepare a robust assessment. Specific subjects raised included consideration of existing bog rehabilitation proposals, potential for effects on habitat/species of high biodiversity value, potential conflicts between strategic ecological value and use of site for wind energy, consideration of optimal site use in contributing to reductions in carbon emissions, effects of site/habitat management on how wildlife uses the site during operational the phase, assessment of drainage requirements and associated potential for water quality effects, long term peatland rehabilitation plans following wind farm decommissioning, and potential effects on a known wintering whooper swan flock in the immediate locality.

The response noted that the EIAR should take account of Objective 1 of the National Biodiversity Action Plan which is to mainstream biodiversity into decision-making across all sectors and also referenced guidance which should inform the preparation of the EIAR. The importance of avoidance through design as a first principle was highlighted. The response also noted that thorough and complete descriptions of both the proposed development and baseline environments are required for a robust assessment, with a particular focus on peat management, drainage and hydrological connectivity. The requirement to mitigate habitat loss and the importance of potential Annex I habitats occurring outside the Natura 2000 network were also noted. Potential effects of turbine lighting and A section on key survey requirements was included, with ornithology, bats, aquatic ecology, habitats, marsh fritillary butterfly and invasive alien plant species noted as key areas of interest. Guidance and legislation relevant to the impact assessment was listed and discussed, in addition to guidance relevant to Appropriate Assessment.

Assessment of cumulative effects, post-construction monitoring, and derogation licence requirements were also discussed. Consideration of alternatives were also raised.

A further submission to the NPWS was made on 15th December 2025, with a response received 22nd January 2026 and a meeting held 12th February 2026, this focussed on:

- Visibility analysis
- Breeding curlew surveys
- Contextualisation of impacts on Curlew
- Winter Hen harriers roosts

A copy of all of the abovementioned NPWS submissions and responses (including meeting minutes) is contained in Appendix 2.5.

Applicants Response

The above DAU/NPWS observations have been addressed through the design process, within the EIAR assessment, and by mitigation prescribed in the Biodiversity and Ornithology Chapter and also within the Hydrology chapter of this EIAR.

2.4.7 NMS Consultation – Ref. G Pre00401/2025

On 10 December 2025 FT issued an email to the National Monuments Service seeking any comments arising regarding the proposed Littleton Wind Farm.



On 23 January 2026, the Development Applications Unit of the Department of Housing, Local Government and Heritage responded, with the following comments:

“It is noted that the development is large in scale. Given the scale, extent and location of the proposed development and its proximity to a number of Recorded Monuments it is possible that subsurface archaeological remains could be encountered during the construction phases that involve ground disturbance.

In line with national policy, see Section 3.6 of Frameworks and Principles for the Protection of the Archaeological Heritage 1999, the Department recommends that an Archaeological Impact Assessment, as described below, should be prepared to assess the potential impact on archaeological remains in the area where development is proposed to take place. And that such an assessment be submitted with a future planning application.

The applicant should engage the services of a suitably qualified archaeologist to carry out an archaeological impact assessment (of the development site. The Archaeological Impact Assessment must include:

- *A baseline archaeological and historical study comprising site inspection/s by a suitably qualified Archaeologist and documentary research including reviews of historical, cartographic and aerial photography sources.*
- *Walkover surveys and field inspections*
- *An Archaeological/Historic Landscape study.*
- *Visual Impact Assessment*
- *The desk-study and field inspection regime should inform:*
 - *Targeted non-intrusive advance geophysical survey or prospection (such as Resistivity, Magnetometer or Ground Penetrating Radar Surveys)*
 - *Targeted peatland surveys*
 - *Targeted advance archaeological test excavation*
- *Any and all intrusive advance investigations (such as, but not limited to, ground investigations for soils/geology/hydrogeology) carried out as part of the EIA or design process should be subject to a programme of archaeological monitoring by a suitably qualified archaeologist.”*

Applicants Response

Please refer to Section 14.2.2 of Chapter 14 Archaeological, Architectural and Cultural Heritage for a full response to NMS comments.

2.4.8 Community Consultation and Public Information Events

Between 2021 and 2025, BnM, and later the BnM–SSE Renewables Joint Venture, undertook an extensive and structured community engagement programme for the Proposed Development. This Programme was adapted throughout to reflect evolving COVID-19 public health restrictions and incorporated household outreach, virtual platforms, virtual meetings, communication with elected representatives, and public information events.



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

To inform local residents about the Proposed Development a project Community Liaison Officer (CLO) was appointed, and an introductory information pack was delivered in April 2021 via door-to-door to all householders within a c.2km radius of the area of the site to c.490 households. All the information sent to the local community was also made available for public viewing on the project information website, which went live in March 2021. The information contained in the pack and distributed to each household consisted of the following:

- A project information brochure,
- An A2 double sided map *outlining the study area for the Proposed Project*.
- Dedicated contact details (name, phone and email) for the CLO in relation to the project, along with a web address for the dedicated project website.
- A feedback Questionnaire
- A consent form to join the project's mailing list
- A communications opt-out form

Additionally, the Project Team facilitated Virtual Online Consultation Sessions with individuals to discuss the proposed development which could be organised by contacting the project team via phone, email, or through the online meeting booking facility on the project website. Due to the COVID-19 restrictions in place regarding public gatherings in April 2021, it was not possible to arrange formal Community Information Sessions in the local area. As an alternative to the Community Information Session format, residents were invited, via the Project Feedback Questionnaire and dedicated website, to complete an expression of interest form to attend Community Engagement Clinics, which were to be held online and by appointment only.

In October 2021, the Project Team published the draft layout for the Proposed Development. This was accompanied by door-to-door visits in the community and a series of Community Information Sessions in November/December 2021 in the locality.

In September 2025, the Community Liaison Officer delivered a project information pack containing updated information on the Proposed Development; namely a revised layout for the Proposed Project on an A2 double-sided map to householders in the Community which was supported with a Community Information Event in October 2025 providing an opportunity for direct engagement with the Project Team and specialist consultants.

Throughout the pre-planning period, engagement was further supported through ongoing correspondence, meetings with residents and community groups, and continuous availability of a dedicated Community Liaison Officer.

The objective of the consultation was to ensure that the views and concerns of all were considered as part of the Proposed Development Design and EIA process. **Appendix 2-3** of this EIAR contains a full and detailed Community Engagement Report. The report was prepared to record the consultation carried out with local community in respect of the Proposed Development.



Active engagement and consultation with the local community has taken place from an early stage during the pre-application phase of the Proposed Development. The consultation process has informed the Proposed Development design and the EIA process by identifying key local issues and concerns and supporting iterative design refinement. There is currently ongoing consultation with the local community, and it is the intention of the Applicant to continue with the consultation for the entire lifespan of the Proposed Development.

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

Please refer to the Community Engagement Report at **Appendix 2-3** of the EIAR for further details.

2.5 Planning Policy

2.5.1 Introduction

The Irish Planning Policy system is set within a hierarchical structure, as identified in Figure 2-1, below. EU Directives, Planning Legislation, Ministerial Guidelines, Government Policy and Capital programmes inform national policy.

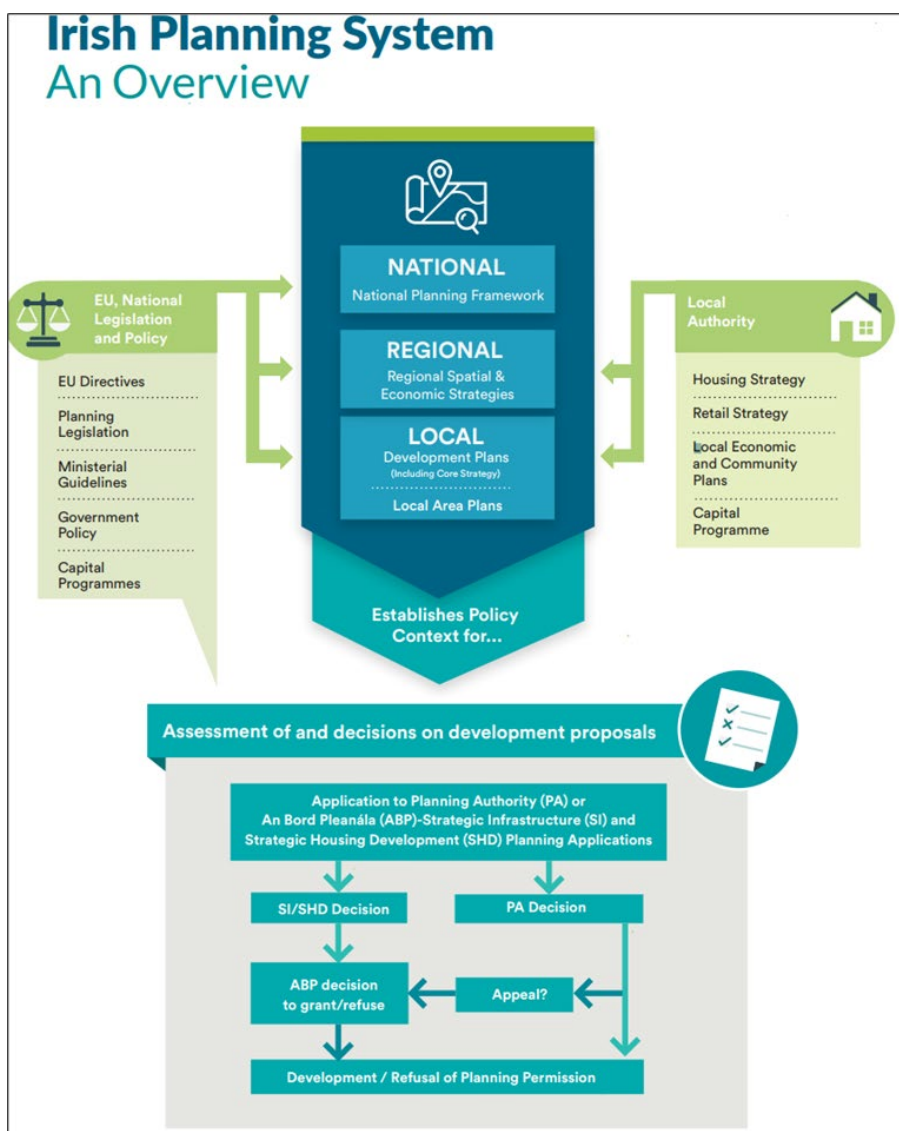


Figure 2-1: Irish Planning System – An Overview from the National Planning Framework – Ireland 2040

International and European legally binding agreements to reduce the reliance on fossil fuels and to manage climate change internationally have been adopted into Ireland’s National Energy Policy. This chapter of the EIAR outlines how these legally binding agreements are being facilitated through national energy and climate policy with a clear mandate to support onshore wind energy development within the state.

The recent increase in renewable electricity targets to 80% by 2030 indicates the need for significant escalation in renewable energy production in Ireland. The following Chapter sets out how the Proposed Development complies with national and local energy policy and will contribute towards Ireland’s national renewable energy targets.



2.6 International Global Policies

2.6.1 United Nations Framework Convention on Climate Change and the Paris Agreement

The *Conference of the Parties* (COP) is the highest body of the UNFCCC and consists of environment ministers who have met annually since 1995 to assess progress in dealing with the issue of climate change. At the latest Conference of the Parties, COP 29, which was held in Baku, Azerbaijan from the 11th to the 24th November 2024, an agreement was reached for developed nations to pay up to \$300 billion per year by 2035 to support climate efforts in developing countries. COP 29 also finalized rules for an international carbon market under the Paris Agreement but failed to agree on how to implement last year's pledge to transition away from fossil fuels, which was deferred to COP 30 in Brazil.

The *International Panel on Climate Change* (IPCC) has put forward its clear assessment that the window for action on climate change is rapidly closing, and that renewable energy sources such as wind will have to grow from 30% of global electricity at present, to 80% by 2050 if we are to limit global warming to well below 2°C above pre-industrial levels in accordance with previous COP agreements. COP 28 gave a renewed emphasis on climate action and the increasing viability and role of renewables such as wind energy to provide a more sustainable future. This was emphasised by a key outcome of COP28 which was the "*Global Renewables and Energy Efficiency Pledge*". Otherwise referred to as the '*COP28 Global Renewables And Energy Efficiency Pledge*', this pledge aims to triple global renewable energy capacity by 2030, reaching at least 11,000 GW, with wind energy expected to be a major contributor to achieving this target.

The wind energy sector, represented by organisations like the *Global Wind Energy Council* (GWEC), actively participated in COP28, where they highlighted the advantages of wind power as a viable and sustainable means of reducing reliance on fossil fuels, boosting energy security, and creating jobs. Former Environment Minister Alan Kelly remarked as far back as 2015 that "*As a nation, we must do everything in our power to curb our emissions*".

In this regard, the Government enacted the *Climate Action and Low Carbon Development Act 2015* and the *Climate Action and Low Carbon Development (Amendment) Act 2021* which provides for the approval of plans by the Government in relation to climate change for the purpose of pursuing the transition to a low carbon, climate resilient and environmentally sustainable economy.

2.6.2 Kyoto Protocol and the Doha Amendment to the Kyoto Protocol

In 1997, the *Kyoto Protocol* set legally binding obligations for developed countries to reduce their greenhouse gas (GHG) emissions within two commitment periods. The *Kyoto Protocol* is an international treaty which extends the 1992 *United Nations Framework Convention*. The *Kyoto Protocol* came into effect in 2005, as a result of which, emissions reduction targets agreed by developed countries, including Ireland, are now binding.

Under the *Kyoto Protocol*, the EU agreed to achieve a significant reduction in total greenhouse gas emissions of 8% below 1990 levels in the period 2008 to 2012. Ireland's contribution to the EU commitment for the period 2008 – 2012 was to limit its greenhouse gas emissions to no more than 13% above 1990 levels.



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

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

Published by the International Energy Agency (2021), ‘*Net Zero by 2050: A Roadmap for the Global Energy Sector*’ cautions that renewables growth will still need to double to reach the Paris Agreement goal of achieving net-zero emissions by 2050. The International Renewable Energy Agency (IRENA), an intergovernmental organisation focusing on sustainable energy, in a report on the Nationally Determined Contributions relating to renewable energy also note that, even with the renewable energy pledges in the 2015 Paris agreement, the 1.5°C goal will still be exceeded before the end of the century.

2.7 European Union Directives - Legislation and Policy

This section summarises the previous policies and targets for renewable energy and greenhouse gas (GHG) emissions in Europe up to 2020 in order to provide context and establish the progress made in Ireland over the past two decades to achieve these EU targets. The section then details the latest policies and targets with a view to 2030 and beyond. The various directives and policies of the EU set a clear mandate for each member state to transition to sustainable, renewable energy and reduce greenhouse gas emissions. This is reflected in the theme of European Commission President, Ursula von der Leyen’s inaugural ‘State of the Union’ address delivered on 16 September 2020 which emphasised the need to transform the European economy and society to deal with the climate change emergency. It was also stated that the EU aims to reduce the EU’s net greenhouse gas emission by at least 55% on 1990 levels by the end of this decade.

2.7.1 EU Emission Trading System (ETS)

One of the key mechanisms introduced under the Kyoto Protocol is the international emissions trading scheme which allows developed countries to trade their commitments. They can trade emissions quotas among themselves and can also receive credit for financing emissions reductions in developing countries.

The EU Emission Trading System (ETS) came into operation on 1 January 2005 and was introduced to allow Member States achieve their commitments to limit or reduce greenhouse gas emissions in a cost-effective way. It is the largest such scheme in the world and allows participants to buy or sell emission allowances which means that emission cuts can be achieved at least at cost. The EU ETS is now in its fourth trading phase (2021-2030).

The EU ETS is a ‘cap and trade’ scheme, in that it caps the overall level of emissions allowed but, within that limit, allows participants in the scheme to buy and sell allowances as they require. These allowances are the common trading ‘currency’ at the heart of the scheme. One allowance gives the holder the right to emit one tonne of CO₂ or the equivalent amount of another greenhouse gas (CO₂eq).



The categories of activity covered by the EU ETS are set out in Annex 1 of the principal Directive, as amended (2003/87/EC) (the "ETS Directive") and the greenhouse gases to which the Scheme applies to are set out in Annex II of the same Directive.

The Scheme operates in periodic cycles that have come to be known as 'phases' as the EU ETS scheme is open ended with no termination date specified. Phase 1 ran from 2005 - 2007 and was known as the commitment period, Phase 2 covered 2008 - 2012 (the Kyoto Phase) and Phase 3 ran from 2013 - 2020, with this phase completing at the same date as the EU Commissions end date of 31 December 2020 for its own reduction in greenhouse gases.

Phase 4 runs from 2021-2030 and aims to achieve the EU's 2030 emission reduction targets in line with the 2030 climate and energy policy framework and as part of the EU's contribution to the 2015 Paris Agreement (EU, 2019)⁶. Following revisions to the ETS Directive in 2023, the trading system is set to bring emissions down by 62% by 2030, compared with 2005 levels.

2.7.2 European Union Targets for 2020 and the Irish Context

The year 2020 was a significant milestone for renewable energy and emissions targets in Europe. The EU Directive on the Promotion of the Use of Energy from Renewable Sources (2009/28/EC) set a target of 20% of EU energy consumption from renewable sources by 2020 and a 20% cut in greenhouse gas emissions by 2020, the so-called 20:20:20 plan.

As part of this Directive, Ireland's overall national target for the share of energy from renewable sources in gross final consumption of energy in 2020 was 16% (increased from 3.1% in 2005). For renewable electricity alone, Ireland set a national target of 40% by 2020 as outlined in the National Renewable Energy Action Plan (NREAP). The sectoral components of the overall 16% target are detailed in Table 2-1, which outlines each form of renewable energy supply (RES). The share of renewable energy for each component in the two years leading up to 2020 is also presented.

Table 2.8 demonstrates that Ireland made significant progress in achieving its 2020 renewable electricity targets. Wind energy accounted for 32% of all electricity generated in 2019, the largest contributor of renewable electricity in Ireland.

Table 2-8: Target and Current Share of Renewable Energy in Energy Sectors

Form of Renewable Energy Supply	2018 Position (SEAI, 2020)	2019 Position (SEAI, 2020a)	Target Share For 2020
Electricity (RES-E)	33.2%	36.5%	40%
Heat (RES-H)	6.5%	6.3%	12%
Transport (RES-T)	7.2%	8.9%	10%

Source: SEAI (2020), Renewable Energy in Ireland 2020 Update & SEAI (2020a), Energy in Ireland 2020 Report

⁶ [Auctioning Regulation amendment for phase 4 of the EU ETS published and to enter into force \(europa.eu\)](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32023R0959)



In 2008, the EU agreed a climate and energy package that included a target to reduce GHG emissions across the EU by 20% below 1990 levels by the year 2020. This resulted in two pieces of European legislation focusing on reduction in GHG emissions. Directive 2009/29/EC requiring ETS companies to reduce their emissions by 21% below 2005 levels by 2020; and Decision 406/2009/EC which set out the minimum contribution of Member States for meeting greenhouse gas reductions which required Ireland to reduce non-ETS emissions by 20% below 2005 levels by 2020.

According to EPA (2022)⁷, Ireland achieved approximately 13.6% reduction in GHG emissions compared to 2005 levels (the baseline). This included an approximate 35.4% reduction in GHG emissions in the energy sector, indicating renewable energy's significant contribution to the overall reduction in greenhouse gas emissions in Ireland.

Table 2-1, above, clearly outlines the progress made towards the 2020 targets, while making it abundantly clear renewable energy sources have contributed greatly to the achievement of Ireland's energy and emissions targets as set by the EU. This places Ireland in a strong position to continue this progress towards 2030 EU targets, as detailed in the following sections.

2.7.3 2030 Climate and Energy Framework

In October 2014 EU leaders adopted the 2030 Climate and Energy Framework (European Commission, 2014) which was subsequently updated in 2018. The framework provides a long-term perspective beyond 2020 targets. The 2030 Climate and Energy Framework sets out three key targets for the year 2030:

- At least 40% cuts in greenhouse gas emissions (from 1990 levels)
- At least 32% share of renewable energy
- At least 32.5% improvement in energy efficiency.

Further to this the European Commission in 2016 published its 2030 emissions targets break down for each Member State. While the overall EU target is a reduction of 40% on 1990 greenhouse gas emissions by 2030, every Member State negotiates an individual target. Ireland will have to reduce its emissions by 30% relative to its 2005 emissions.

Ireland will have 4% one-off flexibility from emissions trading, at the highest end of the ranking. Ireland will have 5.6% flexibility from land use. This is a substantially larger margin than any other Member States except Latvia.

⁷www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA-Ireland's-Provisional-GHG-Emissions-1990-2021_July-2022v3.pdf



2.7.4 A Roadmap for Moving to a Competitive Low Carbon Economy in 2050

Looking beyond 2020 in compliance with the EC Energy Roadmap 2050, an EU target of at least 75% has been indicated as the share of renewable energy consumed in the EU in 2050. While the Department of Communications, Climate Action and Environment (DCCAE) is currently examining the potential for diversifying Ireland's renewable technology mix in the post-2020 period, the Department recognises that; *"as a proven and cost effective technology, onshore wind will remain part of Ireland's generation portfolio out to 2030 and will help to meet Ireland's contribution to the binding EU-wide 2030 renewable energy target"*⁸. The Roadmap has informed national policy and has influenced the Climate Action Plan (2024 and 2025) which sets out actions to reduce climate change towards 2050.

2.7.5 Renewable Energy Directives (RED II & RED III)

The EU Directive (2018/2001/EU), known as the Renewable Energy Directive II (RED II), entered into force on 11 December 2018 with one of its aims being to provide guiding principles on financial support schemes for RED, renewable energy self-consumption, energy communities and district heating. . As part of RED II, Ireland's overall national target for the share of renewable energy sources (RED-E), forms the backbone of Ireland's strategy to achieve the overall renewable energy target for 2030.

Following on from RED II, the EU adopted 'Directive (EU) 2023/2413', known as Renewable Energy Directive III (RED III) on 20th November 2023, aiming to further increase its renewable energy ambitions. RED III amends RED II, and is in line with the 'European Green Deal (2019), described in 4.3.6 below. RED III sets a new binding target of c. 42.5% renewable energy in the EU's total energy consumption by 2030, with an aspirational target of 45% being introduced. RED III introduces sector-specific targets for transport, heating, cooling and industry, to ensure a balanced contribution from all parts of the economy, and also includes measures to streamline and accelerate the permitting process for renewable energy projects, addressing one of the key bottlenecks in the deployment of renewables.

Under RED III, Member States must ensure that in the permit-granting procedure, the planning, construction and operation of renewable energy plants is presumed to be in the overriding public interest. The faster consenting timelines for renewable energy projects required under RED III have been transposed into Irish law by the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. 274/2025). RED III reflects the EU's commitment to achieving higher renewable energy targets, and facilitating clean energy.

As of 15th August 2025, new measures aimed at fast tracking the permitting procedures for renewable energy projects have been adopted into Irish Law. The European Union (Planning and Development) (Renewable Energy) Regulations 2025 (the Regulations) transpose several provisions of the third Renewable Energy Directive (EU Directive 2023/2413) (RED III). The Regulations introduce measures relevant to the following categories of renewable energy development:

- Energy from a renewable non-fossil source - wind energy, solar energy, geothermal energy, osmotic energy, ambient energy, tide, wave and other ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas or biogas
- Repowering development
- Small-scale renewable energy installations, including heat pumps and solar energy equipment.

⁸https://unece.org/fileadmin/DAM/env/pp/compliance/C2014-112_Ireland/frComm_03.09.2017/frCommC122_03.09.2017_update_att_1_Information_Note_on_Review_of_the_Wind_Energy_Development_Guidelines.pdf



The Regulations introduced a new completeness check for applications for renewable energy development.

This new rule provides that where a planning authority or An Coimisiún Pleanála (the Commission) receives an application for permission for the applicable renewable energy and repowering development, it must acknowledge and assess the application for completeness within 45 days of receipt. Once an application has been confirmed as complete, a planning authority or the Commission has 52 weeks to make a decision on whether to grant permission or not.

The commencement of the Regulations marks an important step in ensuring that renewable energy development is fast-tracked and Ireland's wider obligations under RED III are met. The introduction of completeness checks is aimed at addressing issues with applications at an early stage and before the clock starts for the mandatory decision-making periods. For this reason, pre-application consultation will be all the more important particularly for those developments which can no longer be subject to further information requests.

The majority of the new rules are effective immediately with the exception of the EIA opinion provisions. These will come into force on 1 October 2025.

2.7.6 Clean Energy for all Europeans Package (2019)

The EU, in 2016, decided to tackle the transition towards clean energy and a carbon-neutral economy by rewriting the EU's energy policy framework to facilitate a clean and fair energy transition. By providing a modern, stable legal environment and setting a clear and common sense of direction, the EU aims to stimulate the necessary public and private investment and bring European added value by addressing these challenges. As a package, the new rules will reinforce consumer rights, putting them at the heart of the energy transition and creating growth and green jobs in a modern economy. They will enable the EU to show leadership in the fight against climate change following the Paris Agreement.

Member States will continue to choose their own energy mix but must meet new commitments to improve energy efficiency and the take-up of renewables in that mix by 2030. For example, the new rules on the electricity market, which have been adopted, will make it easier for renewable energy to be integrated into the grid, encourage more inter-connections and cross-border trade, and ensure that the market provides reliable signals for future investment. Member States are required to draft plans to prevent, prepare for and manage crisis situations in the supply of electricity in coordination with neighbouring Member States, and to enhance the role of the Agency for the Cooperation of Energy Regulators.

2.7.7 European Green Deal (December 2019)

The European Green Deal, published on 11th December 2019, is a growth strategy for the EU which aims to transform the EU into a fair and prosperous society, improving quality of life with modern, resource-efficient, and competitive economy where there are no net emissions of greenhouse gases in 2050 and where economic growth is decoupled from resource use. The EU aim to do this by becoming climate-neutral by 2050.

With regard to the supply of clean, affordable and secure energy, the European Green Deal underlines the fact that in order to meet the EU's climate and sustainability goals, all sectors must increase their use of renewable energy and phase out fossil fuels.

The EU aim to increase the greenhouse gas emission reductions targets for 2030 to at least 50% and towards 55%, compared to 1990 levels, in order to achieve net-zero greenhouse gas emissions by 2050. A key principle for achieving this will be to develop a power sector based on renewable resources.



2.7.8 European Climate Law (July 2021)

The European Climate Law, which entered into force on 29th July 2021, writes into law the goal set out in the European Green Deal for Europe's economy and society to become climate-neutral by 2050. The law set the intermediate target of reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels. However, on 6th February 2024, the European Commission presented its updated assessment for a 2040 climate target for the EU.

In July 2025, the European Commission proposed an amendment to the European Climate Law which would set an EU climate target of a 90% reduction in net greenhouse gas emissions by 2040, in comparison to 1990 levels. The proposed 2040 climate target will reaffirm the EU's determination to tackle climate change, and will shape the EU's path after 2030, to ensure the EU reaches climate neutrality by 2050. The climate neutrality objective is at the heart of the European Green Deal.

Climate neutrality by 2050 means achieving net zero greenhouse gas emissions for EU countries as a whole, by cutting emissions, investing in green technologies and protecting the natural environment. The law aims to ensure that all EU policies contribute to this goal, and that all sectors of the economy and society play their part, where the main objectives of the climate law include:

- Implementation of Existing Laws: Fully implement existing EU laws to reduce emissions by at least 55% by 2030 compared to 1990 levels;
- Decarbonisation of Industry: Focus on decarbonising industry by leveraging strengths in wind power, hydropower, and electrolyzers, and investing in technologies for carbon capture, storage, and reuse;
- Boosting Domestic Manufacturing: Increase domestic manufacturing in growth sectors such as batteries, electric vehicles, heat pumps, and solar cells;
- Fairness and Solidarity: Ensure fairness and solidarity by supporting vulnerable citizens, regions, businesses, and workers through tools like the Social Climate Fund and Just Transition Fund;
- Open Dialogue: Maintain an open dialogue with all stakeholders, including farmers, businesses, social partners, and citizens.

2.7.9 RePower EU Plan

The RePower EU Plan was published on 18th May 2022 and is a plan which sets out a response to the hardships and global energy market disruption caused by Russia's invasion of Ukraine and the need for the role of renewable energy to slow down climate change and to phase out Russian fossil fuels by 2027. To address these, the RePower EU Plan contains measures to:

- Save energy;
- Diversify supplies;
- Quickly substitute fossil fuels by accelerating Europe's clean energy transition;
- Smartly combine investments and reforms.



The RePower EU Plan states:

“Wind energy, in particular offshore wind, represents a significant future opportunity: resources are stable, abundant and public acceptance is higher. Europe is the global leader in offshore wind. To further strengthen the EU wind sector’s global competitiveness and achieve the REPowerEU ambition with fast wind energy deployment, supply chains need to be strengthened and permitting drastically accelerated.”

Specific objectives of the REPower EU Plan are that Member States should speed up the green transition and spur massive investment in renewable energy. Ireland will need to enable industry and transport to substitute fossil fuels faster to bring down emissions and dependencies.

2.7.10 [Commission Recommendation and Guidance to Member States \(EU\) 2024/1343 of 13 May 2024 on speeding up permit granting procedure for renewable energy and related infrastructure projects](#)

The Commission Recommendation and Guidance to Member States (EU) 2024/1343 of 13 May 2024 is a document which intends to speed up the permit granting procedure for renewable energy and related infrastructure projects in the European Union. The document provides a number of recommendations and guidance on how to streamline the permitting process, which include some of the following:

- Streamlining procedures: The document recommends that Member States simplify and harmonize their permitting procedures, including by reducing the number of permits required and by streamlining the environmental impact assessment process.
- Digitalisations: The document encourages Member States to use digital tools to improve the efficiency of the permitting process, such as by providing online portals for submitting applications and tracking the progress of permits.
- Stakeholder engagement: The document emphasizes the importance of early and effective stakeholder engagement in the permitting process. This includes involving local communities, businesses, and other interested parties in the planning and decision-making process.
- Human resources and skills: The document recommends that Member States invest in the training and development of staff who are responsible for processing permit applications.

The document also provides guidance on how to designate "*renewables acceleration areas*" which are areas where the deployment of renewable energy projects is not expected to have significant environmental impacts, where the permitting process can be further streamlined, which is likely to have a positive impact on the deployment of renewable energy and related infrastructure in the EU.

2.7.10.1 *Applicants Response:*

In response to the European Union Directives - Legislation and Policy section and its application to the Proposed Development at the Littleton Bog Group, the increased target in the *Renewable Energy Directive* and change of wording to "*overriding public interest*" (European Commission (2021), underlines the vital nature of investments into new renewable energy developments such as the Proposed Development, which would increase the domestic renewable energy production capacity of Ireland (by ~68.2MW) and its contribution to the EU overall target.



Under RED III, Member States must ensure that in the permit-granting procedure, the planning, construction and operation of renewable energy plants is presumed to be in the overriding public interest. The faster consenting timelines for renewable energy projects required under REDIII have been transposed into Irish Law by the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I 274/2025). REDIII reflects the EU's commitment to achieving higher renewable energy targets, and facilitating clean energy.

Ireland's renewable energy share, and that of all EU member states, is calculated and monitored by the European Commission under different iterations of the Renewable Energy Directive (RED), with Ireland continuing to work towards achieving renewable electricity targets. The latest data from the *Sustainable Energy Authority of Ireland* (SEAI) from September 2024 shows Ireland's total installed wind capacity at the end of 2023 was 4.74 GW, an increase of c. 0.20 GW in capacity during 2023. (Source: SEAI, September 2024). Regarding Ireland's commitments to increasing the indigenous supply of renewable energy to reach our stated targets, the report goes on to say:

"In its most recent climate action plan (CAP), Ireland has set itself a target of 6 GW of installed wind capacity by the end of 2025. To achieve this target, Ireland will need to add an average of 0.63 GW of installed capacity in both 2024 and 2025. Ireland's target for 2030 is 15 GW of installed wind capacity, with 9 GW of onshore wind and 5GW of offshore wind. Achieving this target will require adding an average of 1.47 GW of installed capacity every year for the next seven years."

The Proposed Development is expected to generate c. 68.2MW of renewable wind energy, directly supporting Ireland's contribution to the European Union's renewable energy targets. As described above, the EU has set a goal of reaching a 42.5% renewable energy share by 2030. With Ireland aiming for 15 GW of total installed wind capacity by 2030, the Proposed Development would account for c. 0.45% of Ireland's national target, which is c. 0.015% the overall required renewable energy recruitment.

The Proposed Development reflects the broader EU strategy to accelerate the transition to clean energy. These provisions emphasise the necessity of progressing wind energy developments across Europe, reinforcing the urgency of developments like Littleton in securing a sustainable energy future.

2.8 National Policies and Legislation

National energy and climate policy are informed by the overarching European Policy which aims to unify the European Union in energy and climate goals. The following section sets out the relevant national policies which will influence the development of the country in the coming decades with respect to energy production, carbon neutrality and climate change mitigation.

These policies are supported by the latest *Programme for Government* (2025), titled '*Securing Ireland's Future*' which presents strong climate governance in rapidly reducing climate change in order to protect and improve public health and quality of life, and had identified wind energy as having a crucial role to play in achieving this. The government are committed to the rapid decarbonisation of the energy sector with an aim of providing the necessary actions to deliver national renewable electricity targets. These government ambitions support the ongoing generation of renewable energy from onshore wind sources. The Climate Action Plan 2024 and Climate Action 2025, which must be read together, state the following commitments:

- To achieve 80% renewable electricity by 2030;
- Deliver 9 GW of onshore wind by 2030;
- Hold at least one RESS auction per year;
- Prioritizing and increase investment in the electricity grid;
- Develop a policy to address repowering and extend the life of existing onshore wind farms.



2.8.1 The White Paper: Ireland's Transition to a Low Carbon Energy Future 2015-2030

The Government strategy calls for a radical transformation of Ireland's energy system to meet committed targets and achieve a low carbon energy system by 2050. These commitments included a then EU target to source 20 per cent of its energy needs from renewables such as wind, solar and biomass. Within this, Ireland committed to generating 16 per cent of its overall energy requirements from renewables by 2020 under the EU's plan, with 8 per cent coming from renewables at the time of publication.

The strategy includes an objective to "*accelerate the development and diversification of renewable energy generation*" and increase the country's output of electricity from renewable sources of which we have a plentiful indigenous supply. It is stated that this will be achieved through a number of means including wind, solar PV and ocean energy. The paper recognizes that growth in renewable energy has been led by onshore wind which will continue to be a mainstay in renewable energy generation which is:

"a proven technology and Ireland's abundant wind resource means that a wind generator in Ireland generates more electricity than similar installations in other countries".

2.8.1.1 *Applicants Response:*

The Proposed Development adheres to, and contributes to, the White Paper's strategy to "*accelerate the development and diversification of renewable energy generation*" through the provision of onshore wind generation, which will contribute to an overall increase in the country's output of electricity from renewable energy sources. The Proposed Development also supports the White Paper's goal of mitigating climate change by displacing electricity generated by fossil fuels, which will lead to a reduction in national greenhouse gas emissions. The construction and operation of a wind farm in Littleton will also increase economic opportunities, which also aligns with the White Paper's recognition of the economic opportunities inherent in the low-carbon transition.

2.8.2 Climate Action and Low Carbon Development (Amendment) Act 2021

The Climate Action and Low Carbon Development Act was signed into law in December 2015 and subsequently amended by the Climate Action and Low Carbon Development (Amendment) Act 2021 (the "Climate Act").

The Climate Act sets out the national objective of transitioning to a low carbon, climate resilient and environmentally sustainable economy in the period up to, and including, the year 2050. The Act provides for a solid statutory foundation to the institutional arrangement necessary to enable the State to pursue and achieve the "national transition objective".

The Climate Act provides for the approval of plans by the Government in relation to climate change for the purpose of pursuing the transition to a climate resilient, biodiversity rich and carbon neutral economy by the end of the year 2050. It establishes a legally binding framework with clear targets and commitments set in law, and embeds the necessary structures and processes on a statutory basis to ensure we achieve our national, EU and international climate goals and obligations in the near and long term. The Act significantly strengthens the framework for governance of climate action by the State in order to realise our national, EU and international climate goals and obligations.



The Climate Action and Low Carbon Development (Amendment) Act 2021, is an amendment to the Climate Action and Low Carbon Development Act 2015 and was signed into law on the 23rd July 2021. The *Climate Action and Low Carbon Development Act 2015* was amended by the *Climate Action and Low Carbon Development (Amendment) Act 2021*, and establishes a framework with clear, legally binding targets and commitments, and ensures the necessary structures and processes are embedded on a statutory basis to achieve our national, EU and international climate goals and obligations in the near and long term.

When exercising its decision-making powers under the Planning Act, planning authorities and the Commission are obliged under s. 15 of the Climate Act to:

“in so far as practicable, perform its functions in a manner consistent with—

(a) the most recent approved climate action plan,

(b) the most recent approved national long term climate action strategy,

(c) the most recent approved national adaptation framework and approved sectoral adaptation plans,

(d) the furtherance of the national climate objective, and

(e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.”

The Act embeds the process of carbon budgeting into law, with the Government required to adopt a series of economy-wide five-yearly carbon budgets to include sectoral targets for each relevant sector on a rolling 15-year basis. These five-yearly carbon budgets commenced in 2021, with the five-yearly carbon budgets equating to a total reduction of 51% emissions over the period to 2030. This reduction in emissions is in line with the programme for Government which commits to a 7% average yearly reduction in overall greenhouse gas emissions over the next decade to achieve net zero emissions by 2050. This Act will drive implementation of a suite of policies to help us achieve this goal.

The Act also includes the following key elements:

- Places on a statutory basis a '*national climate objective*', which commits Ireland to pursue and achieve no later than 2050, the transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy;
- Embeds the process of carbon budgeting into law, Government is required to adopt a series of economy-wide five-year carbon budgets, including sectoral targets for each relevant sector, on a rolling 15-year basis, starting in 2021;
- Actions for each sector will be detailed in the Climate Action Plan, updated annually;
- A National Long Term Climate Action Strategy will be prepared every five years.
- Requires all Local Authorities to prepare individual Climate Action Plans which will include both mitigation and adaptation measures, representing a mandate for Local Authorities to adapt to climate change.



2.8.2.1 Applicants Response:

The Climate Act establishes a framework with clear, legally binding targets and commitments, and ensures the necessary structures and processes are embedded on a statutory basis to achieve our national, EU and international climate goals and obligations in the near and long term. Furthermore, Section 15 of the Act places a statutory obligation on all relevant public bodies to perform their functions in a manner consistent with the most recent approved Climate Action Plan and the National Long-Term Climate Action Strategy. The Proposed Development at Littleton complies with the overall objective of the Climate Action and Low Carbon Development (Amendment) Act 2021 (the "Climate Act") to achieve a transition to a climate neutral economy by 2050, and supports the targets set out in the Climate Action Plan's made under the Climate Action and Low Carbon Development (Amendment) Act 2021 (the "Climate Act").

The Proposed Development at Littleton, which proposes contributing up to c. 68.2MW of renewable energy to climate action goals, should be prioritized, and can only be refused on truly exceptional grounds that demonstrably outweigh their climate benefits, given the statutory obligation on public bodies to support climate policy as required by Section 15.

2.8.3 Ireland's integrated National Energy and Climate Plans 2021-2030 (NECP's)

Ireland's Integrated National Energy and Climate Plan 2021-2030 (NECP's), published July 2024, is the framework within which Ireland must plan their climate and energy objectives, targets, policies, and measures to the European Commission.

The Governance Regulation (*Regulation (EU) 2018/1999 of the European Parliament and of the Council on the Governance of the Energy Union and Climate Action*), within which the NECP framework sits, consolidates the patchwork of planning, monitoring, and reporting obligations Member States had under the different pieces of EU legislation across energy, climate, and other Energy Union related policy areas. Member States were required to develop NECPs on a ten-year rolling basis, with an update halfway through which covers the five Dimensions of the Energy Union, with the Ireland's National Energy and Climate Plan 2021-2030 being updated in 2024.

In accordance with the *Governance of the Energy Union and Climate Action Regulation*, the updated Integrated National Energy & Climate Plan (NECP) 2021-2030 was submitted to the European Commission in December 2023. This document outlines Ireland's energy and climate policies for the period from 2021 to 2030 and looks onwards to 2050, and incorporate comments from the Commission, public consultation and updated policies and targets.

The NECP, as published on 20th July 2024, establishes key measures to address the five dimensions of the EU Energy Union, which include:

- Decarbonisation: GHG emissions and removals and Renewable Energy;
- Energy efficiency;
- Energy security;
- Internal energy market;
- Research, innovation and competitiveness.



It is important to note that Article 4 of the Governance Regulation ((Regulation (EU) 2018/1999 of the European Parliament and of the Council on the Governance of the Energy Union and Climate Action), sets out specific trajectory requirements for renewable energy share in key intermediate years of 2022, 2025 and 2027. The last version of Ireland's first NECP set out specific annual targets for delivery of onshore and offshore wind in order to meet the requirements of Article 4. These intermediate targets will be particularly difficult to deliver and will require early deployment of onshore wind in particular, as the legislative framework underpinning offshore wind is in its infancy.

Within NECP, relevant renewable energy objectives include:

- Achieve a 43% share of renewable energy in energy consumption by 2030;
- Increase electricity generated from renewable sources to 80% by 2030, underpinned by the Renewable Electricity Support Scheme (RESS);
- Streamline consenting and connection arrangements;
- Facilitate community participation in renewable generation;
- Provide funding supports for new technologies onshore and offshore;
- Support the ocean energy research, development and demonstration pathway for emerging marine technologies and associated test infrastructure.

2.8.3.1 Applicants Response:

The Proposed Development aligns with the goals contained within the National Energy and Climate Plan (NECP) 2021-2030. The Proposed Development will generate renewable energy through wind which will in turn displace thousands of tonnes of carbon dioxide over the lifetime of the wind farm. Furthermore, the Proposed Development will also enhance Ireland's energy security and contribute to Ireland meeting its challenging climate change and decarbonisation targets as set out within the NECP 2021-2030. The Proposed Development will be a significant energy infrastructure project which, once constructed and operational, will enhance the capacity and resilience of the local, regional, and national electricity network through continued use of the on-site 110kV substation and grid connection cable once the wind farm has been decommissioned. By enhancing the electrical infrastructure and grid connectivity, the Proposed Development facilitates the integration of further renewable energy projects in the area, thus further contributing to the NECP's objective of streamlining grid connections and maximizing renewable energy deployment. During the operational lifetime of the Proposed Development, up to c. 68.2MW₂ generated by the Proposed Development is projected to displace c. 79,638 tonnes of CO₂ emissions annually, directly supporting the NECP's decarbonisation targets and contribute to Ireland meet its challenging climate change and decarbonisation targets as set out within the NECP.

This will require the implementation of energy security objectives such as support efforts to increase indigenous renewable sources in the energy mix, including wind, solar and bioenergy, and to facilitate infrastructure projects, including private sector commercial projects which enhance Ireland's security of supply and are in keeping with Ireland's overall climate and energy objectives. The Proposed Development will also provide direct and indirect economic benefits to the local community through employment opportunities during construction and operation, the project has facilitated community participation in renewable generation through the project community engagement initiatives as per the objectives of the NECP, and contributions to a Community Benefit Fund which also aligns with the NECP's stated objective of promoting sustainable development and regional economic growth through renewable energy initiatives.



2.8.4 Project Ireland 2040: National Development Plan 2021 – 2030 (NDP) and the National Planning Framework (NPF)

The National Planning Framework (NPF) and the National Development Plan 2021-2030 (NDP) combine to form 'Project Ireland 2040'. The NPF sets the vision and strategy for the development of our country to 2040, and the NDP provides the enabling investment to implement that strategy.

The National Development Plan 2021-2030 (NDP), originally published in October 2021 with a revised NDP published on 22nd July 2025, sets out the Government's over-arching investment strategy and budget for the period 2021-2030. The NDP thereby provides a platform from which investment can be provided and strategized in terms of economic growth, development and sustainability needs. The updated NDP (2025) notes that the review includes an additional €34 billion relative to the previous 2021-2030 NDP including equity funding of €10 billion to 2030 to fund large strategic projects in energy, water and transport.

The National Planning Framework (NPF) sets out the Government's high level strategic plan for shaping Ireland's growth and development up to 2040. As of 30th April 2025, it has been announced that both Houses of the Oireachtas have approved the Revised National Planning Framework (2025), and it is now in effect. The Revised NPF (2025) therefore supersedes the NPF 2018, with the final document now available to view on the NPF website (<https://www.npf.ie/>).

As a strategic development framework, the NPF demonstrates an approach that joins up ambition for improvement across the different areas of Irish life, bringing the various government departments, agencies, state owned enterprises and local authorities together behind a shared set of strategic objectives for rural, regional and urban development. This is shown in NPF, Chapter 9, which states:

"The Government is committed to a long-term climate policy based on the adoption of a series of national plans over the period to 2050, informed by UN and EU policy. This is being progressed through the National Mitigation Plan and the National Climate Change Adoption Framework, both of which will be updated and reviewed periodically."

In addition to legally binding targets agreed at EU level, there is a national objective for Ireland to transition to be a competitive, low-carbon, climate resilient and environmentally sustainable economy by 2050, based on the following:

- a) "an aggregate reduction in carbon dioxide (CO₂) emissions of at least 80% (compared to 1990 levels) by 2050 across the electricity generation, built environment and transport sectors; and
- b) in parallel, an approach to carbon neutrality in the agriculture and land-use sector, including forestry, which does not compromise capacity for sustainable food production."

The key role of the NDP is to set out the updated configuration for public capital investment over the next 10 years in order to achieve the National Strategic Outcomes as set out within the NPF. An example of this is outlined in Chapter 13 'NSO 8 - Transition to a Climate-Neutral and Climate-Resilient Society' of the NPF, which states:

"The Government will continue to support the deployment of additional electricity generation through the auction-based Renewable Electricity Support Scheme (RESS)"



When compared to the NPF 2018, the revised framework acknowledges that Ireland needs to make up for lost ground in relation to carbon reduction targets and move towards the objective of achieving climate neutrality by 2050 and places a stronger emphasis on 'carbon neutrality' through the new and revised policies and objectives. Central to the Revised Framework is the theme of 'Transition to a Carbon Neutral and Climate Resilient Society' ' which states:

- The Climate Action and Low Carbon Development (Amendment) Act was enacted in 2021 (the "Climate Act") with a commitment to a legally binding target to reduce greenhouse gas emissions by 51% and increase the share of electricity generated from renewable sources to 80% over the decade (2021 – 2030), and to achieve net zero emissions no later than 2050.
- This objective will shape investment choices over the coming decades in line with the National Climate Action Plan 2024 and the National Adaptation Framework. New energy systems and transmission grids will be necessary for a more distributed, renewables-focused energy generation system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy to the major sources of demand.

In a similar manner to the 2018 edition of the document, the revised NPF is supported by a series of National Strategic Outcomes (NSOs) which the Framework seeks to deliver. These NSOs have undergone review and alteration as part of the revision process, making accommodations for legislation and policy published in the interim and progress that has been delivered on foot of the publication of the original NPF Policy document. The purpose of NSOs is to create a single vision, through a shared set of goals for every community across the country, and those which are appropriate to the proposed wind energy development are outlined in the table below:

Table 2-9: Revisions to National Strategic Outcome(NSOs), Revised NPF (April 2025)

Policy Objective	Description
National Strategic Outcome 8: Transition to a Carbon Neutral and Climate Resilient Society	Climate change is expected to have diverse and wide-ranging impacts on Ireland's environment, society, and economic development, including on managed and natural ecosystems, water resources, agriculture and food security, human health, and coastal zones. Our low-lying areas and cities and many rural areas are potentially vulnerable if we do not take the appropriate steps to better manage the impacts of climate change. The Climate Action and Low Carbon Development (Amendment) Act enacted in 2021 commits to a binding target to reduce greenhouse gas emissions by 51% and increase the share of electricity generated from renewable sources to 80% over the decade (2021 – 2030), and to achieve net-zero emissions no later than 2050. The national climate objective is to achieve a competitive, low-carbon, climate-resilient, biodiversity rich, and environmentally sustainable and carbon neutral economy by 2050. land use management is required in order to achieve a balance between the built environment, natural environment, biodiversity and climate. The NPF is committed to the achievement of compact and sustainable growth, supporting the provision of sustainable transport options, water services delivery and the delivery of renewable energy development while protecting and where possible enhancing and restoring our natural environment in order to ensure sustainable development for our planet and future generations.



Policy Objective	Description
	Adaptation measures will be required to respond locally specific, place-based responses, which address not only climate impacts but also integrate coherently with local social, economic and ecological systems. The electricity sector faces a significant challenge to meet its requirements under the targets set out in Climate Action Plan 2024. Electricity will also play a key role in the decarbonisation of other sectors through electrification, including transport, heating, and industry. The accelerated delivery of additional renewable electricity generation is therefore essential for Ireland to meet its climate targets, reduce its greenhouse gas emissions, and improve its energy security by reducing reliance on imported fossil fuels and diversifying its electricity supply. New energy systems and transmission grids will be necessary for a more distributed, more renewables focused energy generation system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy. State-owned commercial enterprises are significant players in the energy market, which is subject to EU regulatory framework. The diversification of our energy production systems away from fossil fuels and towards green energy such as wind, wave, solar and biomass, together with smart energy systems and the conversion of the built environment into both generator/consumer of energy and the electrification of transport fleets require the progressive and strategic development of a different form of energy grid. To this end, Smart Specialisation will increase the regional uptake of new advanced technologies to increase the reach of the green transformation across Irish enterprise. The development of onshore and offshore renewable energy is critically dependent on the development of enabling infrastructure including grid facilities to bring the energy ashore and connect to major sources of energy demand. We also need to ensure more geographically focused renewables investment to minimise the amount of additional grid investment required, for example through co-location of renewables and grid connections. Ireland benefits from interconnection with the UK gas pipeline network and while there are two gas pipelines with two separate entry points into the island of Ireland, both pipelines are connected through a single facility in Moffat, Scotland. In addition, our gas storage capacity is limited, which poses a security of supply risk and constrains smoothing of seasonal fluctuation in gas prices. Green Energy Deliver 80% of our electricity needs from renewable sources by 2030 with a strategic aim to increase renewable deployment in line with EU targets and National policy objectives out to 2030 and beyond. It is expected that this increase in renewable deployment will lead to a greater diversity of renewable technologies in the mix. Reinforce the distribution and transmission network to facilitate planned growth and distribution of a more renewables focused source of energy across the major demand centres Strengthen energy security and resilience to support an island population of 8 million people through effective north-south electricity grid interconnection as well as exploring other EU interconnection options in the longer term to 2040.



Policy Objective	Description
	Consideration of carbon neutral electricity generation that would be facilitated through harnessing carbon capture and storage (CCS). National Interconnector (Sub-sea Ring around Ireland) or other solutions offer the potential to connect Ireland to the EU electricity grid System. Roll-out of the National Smart Grid Plan enabling new connections, grid balancing, energy management and micro grid development. District heating networks will be developed, where technically feasible and cost effective, to assist in meeting renewable heat targets and reduce Ireland's GHG emissions.

There are a number of key alterations made to NSO 8 as part of the NPF revision process, which include:

- There has been a noticeable alteration in the terminology and wording surrounding carbon, which has been modified to state 'carbon neutral' as opposed to 'low carbon'. This emphasises that, from a government standpoint, carbon neutrality is being targeted and prioritised instead of a reduction which was an aim of the previous plan iteration.
- Reference is drawn to the requirement of efficiently delivering renewable energy infrastructure and projects within the Irish landscape. It is of note that attention is drawn to accelerating the delivery of such projects, and reference is drawn to energy systems and transmission grids.
- An ambitious target of delivering 80% of our electricity needs from renewable sources by 2030, in line with EU Targets and other national policy, is referenced and introduced into the NPF. This doubles the previously referenced target of 40% by 2020.
- District heating is introduced and referenced in the context of meeting renewable heat targets and reducing GHG emissions.

Additionally, a series of revised National Policy Objectives (NPOs) have been developed as part of the NPF review, which set the context for regional and local planning policy in Ireland. In the context of the proposed development, Table 2.10 below shows revised NPOs are considered the most relevant to the Proposed Development

Table 2-10: National Policy Objectives (NPO) from Project Ireland 2040: The National Planning Framework, April 2025

National Policy Objective	Description
NPO 66	<i>"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."</i>
NPO 69	<i>"Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions as expressed in the most recently adopted carbon budgets."</i>



National Policy Objective	Description																																																	
NPO 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."																																																	
NPO 71	"Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development."																																																	
NPO 73	"Manage the sustainable development of Ireland’s renewable energy resources, having regard to their environmental, social and economic impacts, and to contribute to meeting Ireland’s national and EU renewable energy targets, thereby contributing to climate action objectives."																																																	
NPO 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." <table><tr><th colspan="7">Table 9.1 Regional Renewable Electricity Capacity Allocations</th></tr><tr><th>Region</th><th>Energised capacity 2023 (MW)</th><th>Additional Renewable Power Capacity Allocations (MW)</th><th>Total % of National Share in 2030</th><th>Energised Capacity 2023 (MW)</th><th>Additional Renewable Power Capacity Allocations (MW)</th><th>Total % of National Share in 2030</th></tr><tr><td></td><td colspan="3">Onshore Wind</td><td colspan="3">Solar PV</td></tr><tr><td>Eastern and Midlands</td><td>284</td><td>1,966</td><td>25%</td><td>306</td><td>3,294</td><td>45%</td></tr><tr><td>Northern and Western</td><td>1,761</td><td>1,389</td><td>35%</td><td>0.3</td><td>959</td><td>12%</td></tr><tr><td>Southern</td><td>2,622</td><td>978</td><td>40%</td><td>138</td><td>3,302</td><td>43%</td></tr><tr><td>Total</td><td>4,667</td><td>4,333</td><td></td><td>445</td><td>7,555</td><td></td></tr></table>	Table 9.1 Regional Renewable Electricity Capacity Allocations							Region	Energised capacity 2023 (MW)	Additional Renewable Power Capacity Allocations (MW)	Total % of National Share in 2030	Energised Capacity 2023 (MW)	Additional Renewable Power Capacity Allocations (MW)	Total % of National Share in 2030		Onshore Wind			Solar PV			Eastern and Midlands	284	1,966	25%	306	3,294	45%	Northern and Western	1,761	1,389	35%	0.3	959	12%	Southern	2,622	978	40%	138	3,302	43%	Total	4,667	4,333		445	7,555	
Table 9.1 Regional Renewable Electricity Capacity Allocations																																																		
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Total	4,667	4,333		445	7,555																																													
NPO 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."																																																	



Furthermore, a number of new sections have been introduced into the NPF as part of this revision process with regards to renewable energy. The key points from each of these 4 no. new sections have been summarised in turn below:

- Energy Security in Ireland:** This draws reference to the 'Energy Security in Ireland to 2030' document published by the government in November 2023. It details at a high level that Ireland's future energy will be secure by moving from a fossil-fuel based energy to system to an electricity led system and outlines that as part of the review process that risks to oil, natural gas, and electricity were considered. The section discusses at length the role of gas in facilitating a just and secure transition to this new energy system, Irish sources of gas, and that exiting infrastructure and supply sources are able to meet Ireland's gas demands in the medium and long run. However, it is also emphasised that Ireland relies heavily on gas imports from the UK and any impact would be hugely significant on Ireland's economic and social well-being.
- Renewable Electricity:** This section outlines the ambitious targets to achieve 9GW of onshore wind, 5GW of offshore wind, and 8GW of solar by 2030 which have been set. It once again references that the accelerated delivery of additional renewable electricity generation is critical in achieving these targets and other targets as outlined at an EU level.
- Rural Areas and Energy Production:** Reference is drawn to rural areas continuing to play a role in contributing to Ireland's energy future. However, novel ideas such as the co-location of energy projects and agricultural industry; or the development of renewable energy projects on urban commercial and industrial sites including brownfield sites are introduced. In many ways, this section can be viewed as an attempt to maximise the use of limited land for renewable projects. Further discussion surrounding the potential economic and community benefits is also elaborated upon.
- Making a just transition - Peatlands:** It has been identified that 21% of the Irish landscape comprises bogland, and some of Ireland's cutaway bogs are suitable for facilitating the generation of energy, most notably wind or biomass. However, it is outlined that this land area is Ireland's largest carbon sink, occupying 64% of our total soil organic carbon stock. In this context, it is identified that a careful balance between the development of renewable energy projects on bogland and its preservation will need to be achieved going forward.

2.8.4.1 Applicants Response:

The Proposed Development aligns with the new National Policy Objectives (NPO) set out within the NPF, as the relevant NPOs included in Table 2-33, above, and has been assessed as having suitable wind resources which facilitate the development of the rural economy through supporting a sustainable and economically efficient energy industry while maintaining and protecting the natural landscape and built heritage.

NPO 66 and NPO 70 focuses on the balance between achieving the government's commitment to increasing the contribution of renewable energy sources across Ireland to meet ambitious climate targets, whilst also acknowledging that renewable energy infrastructure, including wind farms, must be sited in environmentally appropriate locations and developed sustainably. The proposed development aligns with these National Policy Objectives by demonstrating through the site selection process undertaken, that the chosen location is appropriate and that the Proposed Development is to be developed in a sustainable manner by carefully considering and mitigating any potential environmental and social impacts to align with the other NPO's described above in Table 2-3.

NPO 71 supports upgrading and developing Ireland's electricity grid infrastructure., with the Proposed Development aligning to this by connecting to, and improving the electrical infrastructure and grid.



NPO 73 highlights an objective for comprehensive assessments of the proposed development's sustainability in relation to aspects such as environmental, social and economic factors. The Proposed Development will demonstrate how it contributes to national renewable energy targets and climate action objectives through carefully considered site selection process, delivery of 11 no. turbines (up to 68.2MW) with on-site 110kV substation and amenity area tracks for the general public to utilise.

NPOs 74 and 75 illustrate the government's overall commitment to diversifying and decarbonising the energy system and highlighting the importance of the RSES for each Regional Assembly, in this case the Southern Regional Assembly. The proposal (of up to 68.2MW) will help to go some way towards meeting the overall national target, and critically the allocated 978 MW additional renewable power capacity identified for onshore wind within the Eastern and Midlands Region.

The renewable energy generated by the Proposed Development will significantly contribute towards increasing renewable energy as a long term and sustainable alternative to fossil fuel and a transition to a carbon neutral economy whilst also contributing to the revised ambitious renewable energy targets outlined in the revised Plan. It will also assist in achieving further energy security, through diversifying energy sources and delivering additional power to the grid.

2.8.5 Climate Action Plan 2024 (CAP24) and Climate Action Plan 2025 (CAP25)

The Government published Climate Action Plan 2024 (CAP24) on 20th December 2023, this was the third updated action plan following on from the inaugural plan of 2019 which was a result of the Irish Government declaring a climate and biodiversity emergency on 9th May 2019. As of April 2025, Climate Action Plan 2025 (CAP25) has been published, with the government's website stipulating that CAP25 is to be read in conjunction with CAP24.

The CAP provides a framework for delivering the Government's target of a 51% reduction (relative to 2018) in greenhouse gas (GHG) emissions by 2030. CAP24 follows the *Climate Act*, which commits Ireland to a legally binding target of net zero greenhouse gas emissions no later than 2050, and a reduction of 51% by 2030. The Act provides a governance framework for annual revisions of the Climate Action Plan and the development of a National Long-Term Climate Action Strategy at least once every ten years. As part of this plan, the Government is also committed to reducing emissions by an average 7% per annum by 2030. The CAP24 is underpinned by a series of sectoral emissions reduction ambitions and enabling actions.

CAP24 sets out an objective to more than double Ireland's onshore wind energy capacity to 9 GW by 2030 in order to meet new renewable energy targets and reduce emissions. Key actions of relevance to the Proposed Development include:

- The electricity system must achieve a 75% reduction in CO₂, reaching 3MtCO₂eq in the final year of 2026 - 2030 carbon budget period.
- Deliver up to 9 GW onshore wind (with 6GW by 2025) by 2030.
- Complete a revised version of *Shaping our Electricity Future* to define required new grid construction and reinforcements to achieve sectoral ceilings and carbon budgets.
- As an urgent priority, establish the investment framework and competitive market, arrangements needed to deliver zero carbon system services.
- Align the relevant constituent elements of the planning and permitting system to support accelerated renewable energy development and ensure renewables will be considered to be in the overriding public interest.



- Action EL/24/1: Establish an Accelerating Renewable Electricity Taskforce to publish programme of work.
- Action EL/24/2: Establish an Offshore Wind Delivery Taskforce to publish key actions for 2024.
- Action EL/24/3: Revision to the National Planning Framework to include regional capacities for the allocation of national targets at a regional level in order to inform local development plan policy.
- Action EL/24/4: Publish Regional Renewable Electricity Strategies.
- Action EL24/6: Publish revised methodology for Local Authority Renewable Energy Strategies.
- Action EL/24/7: Publish new Electricity Generation Grid Connection Policy.
- Action EL/24/8: Deliver onshore and offshore RESS auctions as per the annual RESS auction calendar.
- Action EL/24/9: Develop a Private Wires Policy Framework.
- Action EL/24/13: Publish annual report setting out identifiable public benefits delivered by renewable energy sector.
- Action EL/24/14: Complete economic and spatial analysis to inform the development of the ORE Future Framework.
- Action: EL/24/15 Submit to DECC timelines of large-scale onshore grid development projects to be delivered in 2024 and publish an appropriate version.
- Action: EL/24/19 Develop and publish data sets showing the likely locations, volumes, and load profile of surplus renewable generation on our electricity grid.
- Action EL/24/20: Implementation of CRU Energy Demand Strategy.
- Action EL/24/22: Implementation of enhanced emissions reporting framework for electricity emissions for large energy users and the system operators dispatch actions.
- Action EL/24/30 Complete a stakeholder consultation for an evidence-based decarbonisation pathway for the electricity system to net-zero and support future iterations of the Climate Action Plan.

CAP25 reiterates many of these objectives outlined in CAP24, including the need to double Ireland's onshore wind energy capacity to 9 GW by 2030 in order to meet new renewable energy targets and reduce emissions. The CAP25 comprises a number of new, strategic actions however much of the detail behind the actions is still contained within CAP24. The key CAP25 actions of relevance to this proposed development include:

- It establishes a target for Carbon Budget 1 (2021-2025) of 40 MtCO₂eq, requiring a 75% across all sectors. Current EPA projections indicating an overshoot of over 1 MtCO₂eq.
- It establishes a target for Carbon Budget 2 (2026-2030): 20 MtCO₂eq requiring a 75% across all sectors. Current EPA projections indicating an overshoot of over 5MtCO₂eq.
- Align, as relevant, with the Accelerating Renewable Electricity Taskforce Implementation Plan which sets out a roadmap for the actions to be taken in the near-term to help meet our 2030 targets.
- Action EL/25/1: Manage the Renewable Electricity Support Scheme.
- Action EL/25/2: Publish a long Duration Energy Storage Procurement recommendations paper.
- Action EL/25/3: Development a data sharing framework regarding Low Carbon Technologies connection to the electricity grid.
- Action EL/25/4: Develop Smart-flex standards roadmap.
- Action EL/25/5: Develop consumer-led flexible demand processes.



2.8.5.1 Applicants Response:

In May 2024, the Environmental Protection Agency (EPA) published its Assessment of Progress on Carbon Budget Compliance document entitled "Ireland's Greenhouse Gas Emissions Projections 2023 - 2050". The report does not provide specific details on wind energy beyond general statements, however, the document provides an in-depth analysis and projections of greenhouse gas emissions in Ireland from 2030 - 2050, with projections from 2026-2030 to be set in 2025 (these projections are not yet available at time of writing). In relation to the sectoral emissions ceilings for the first two carbon budget periods, the report notes the following in relation to Electricity Generation:

“Emissions from the Energy Industries sector are projected to decrease by between 57 and 62 per cent over the period 2022 to 2030. Renewable energy generation at the end of the decade is projected to range from 69 to 80 per cent of electricity generation as a result of a projected rapid expansion in wind energy and other renewables.”

In relation to the sectoral emissions ceilings for the first two carbon budget periods, the report notes that:

- Ireland is not on track to meet the 51 per cent emissions reduction target (by 2030 compared to 2018) based on these projections which include most 2024 Climate Action Plan measures;
- The first two carbon budgets (2021-2030), which aim to support achievement of the 51 per cent emissions reduction goal, are projected to be exceeded by a significant margin of between 17 and 27 per cent;
- Sectoral emissions ceilings for 2025 and 2030 are projected to be exceeded in almost all cases, including Agriculture, Electricity, Industry, and Transport;
- Ireland will not meet its non-ETS EU targets of a 42 per cent emissions reduction by 2030 in WAM even with both the ETS and LULUCF flexibilities;
- Emissions in the Planned Additional Measures scenario are projected to be 29 per cent lower in 2030 (compared with 2018) whereas in the Implemented Existing Measures scenario the emissions reduction is projected to be 11 per cent. There has been no improvement in these figures since EPA projections published in 2023;
- Emissions from the Energy Industries sector are projected to decrease by between 57 and 62 per cent over the period 2022 to 2030. Renewable energy generation at the end of the decade is projected to range from 69 to 80 per cent of electricity generation as a result of a projected rapid expansion in wind energy and other renewables.

In relation to sectoral emissions ceilings, the energy production from the Proposed Development is estimated to be 68.2 MW. Based on the Scottish Windfarm Carbon Assessment Tool, if we conservatively assume a capacity factor of 31% and the fraction of output to back up is 1.93% (i.e. 5% of capacity factor) and include the average of 68.2 MW of energy production of the Proposed Development, it would be expected the Proposed Development will result in a reduction in annual emissions in the electricity sector of 79,638 tonnes of CO₂ per annum. This calculation is set out at Section 10.4.4 of EIAR Chapter 10 - Air Quality and Climate.

The 2024 and 2025 Climate Action Plan's established a target of 6GW of installed onshore wind capacity by 2025 and 9 GW by 2030, with c. 4.6 GW's installed onshore wind capacity currently in the Republic of Ireland. This leaves a gap of c. 4.4 GW's to achieve the 2030 target. As such, the Proposed Development has the potential to contribute c. 1.1% of the total additional onshore wind capacity require nationally.



In the context of the urgent need to deliver renewable projects and the projected shortfall in available projects to meet targets, every individual project is critical. The Proposed Development at the Littleton Bog would contribute to increasing Ireland's renewable, domestically produced, wind energy, helping to reduce emissions, improve energy security and achieve electricity the targets such outlined in CAP24 and CAP25.

2.8.6 Eirgrid Assessment of Progress with Carbon Budget Compliance

Emissions analysis completed by Eirgrid⁹ in support of our 2024 Climate Action Plan indicates that in a best case / optimistic case scenario, Ireland will have utilised 58.5Mt of our 60Mt CO₂ equivalent emissions budget by the end of 2029, leaving a budget of only 1.5Mt for 2030. However, in their central case scenario they are predicting that Ireland is currently on track to substantially overshoot this emissions target with emissions across the decade projected to reach 77.2Mt. This would represent a 28.7% exceedance of our legally binding limits. This central case assessment is underpinned by assumptions in relation to the installed capacity of renewables set out in Table 2.11, below.

Table 2-11: EirGrid Centra' Case Assessment (Capacity Assumptions)

Plant	Unit	2022	2023	2024	2025	2026	2027	2028	2029	2030
Onshore Wind	MW	4717	5046	5531	5800	6100	6400	6700	7000	7500
Solar PV	MW	462	1121	1870	2569	3155	3741	4327	4914	6000
Offshore Wind	MW	25	25	25	25	25	25	725	2865	5500

It is also worth noting that:

- This scenario is one which sees Ireland falling short on its 9000MW installed capacity target for onshore wind and is non-compliant with our carbon budget and sectoral emissions ceilings.
- Based on the latest RESS 4 auction results (September 2024), Ireland has not yet reached the onshore wind installed capacity specified in the non-compliant scenario for 2022. The total onshore wind capacity secured in RESS 4 was 374 MW, which falls short of the levels required to align with the projected central case scenario.
- Additionally, the volumes clearing the RESS 4 auction appear to have fallen short of the originally targeted volumes, with the auction securing 1,334 MW of renewable electricity, with 374 MW from wind and 960 MW from solar. While this represents a boost to Ireland's renewable energy capacity, it is not sufficient to align with even the non-compliant central case scenario indicating that developments since the Eirgrid analysis was conducted support the conclusion that even the non-compliant central case scenario is out of reach.

⁹ <https://www.gov.ie/pdf/?file=https://assets.gov.ie/245172/2c2fd729-261b-4b64-af5e-c7f5f8d18924.pdf#page=null>



2.8.6.1 Applicants Response:

The Proposed Development seeks to support Ireland in reducing the exceedances in emissions that are predicted in Eirgrid's "Assessment of Progress with Carbon Budget Compliance", and thereby significantly contributing to Ireland's renewable energy targets. The proposed development will help reduce carbon emissions by displacing CO₂ over its operational lifetime, thus, supporting the national goal of transitioning to a low-carbon economy. Additionally, the Proposed Development will enhance the stability and flexibility of the electricity grid.

2.8.7 All-Island Resource Adequacy Assessment 2025-2034

The All-Island Resource Adequacy Assessment 2025-2034 represents the first edition of the framework, an evolution of the previous annual Generation Capacity Statement. The report seeks to outline the expected electricity demand and the level of generation capacity that will be required on the island of Ireland over the next 10 years to maintain security of electricity supply and economic growth. This analysis will then be used to support Government and Regulatory Authorities in the development of energy policy. As the transmission system operators for Ireland and Northern Ireland, EirGrid and SONI are working to ensure that everyone has electricity when they need it while preparing the transmission grid to provide 80% of our power from renewable sources, in line with Government targets in both jurisdictions.

The Assessment indicates a potentially challenging outlook in Ireland across the study period up to 2034. Looking out to 2030, electricity demand is set to increase as consumers use electricity in new ways. New government policies are expected to help guide us away from fossil fuels toward alternative heating methods, such as electric heat pumps, and cleaner modes of transport, such as electric vehicles. This changing demand and generation supply landscape will require coordinated management of both the volume and type of new capacity, alongside new ways of managing increasing demand to ensure security of supply.

In this assessment, a new approach has been taken in terms of assessing resource adequacy and two scenarios have been identified namely a Base and a Secure scenario. The Base scenario analyses the adequacy position in line with the European Resource Adequacy Assessment (ERAA), and the Secure scenario analyses the system considering Low Imports, Annual Run Hour Limits (ARHL) and other operational requirements. EirGrid and SONI consider the Secure scenario is most prudent and should be adopted for decisions relating to securing capacity for the continued secure and sustainable operation of the power system, noting that capacity market auctions remain an option to procure new generation which could address capacity shortfalls in the medium to long term.

Ireland has a renewable policy goal to deliver 80% renewable electricity by 2030. EirGrid has considered the Renewable Electricity Support Scheme (RESS) and Offshore RESS auction results, ESBN connection data and latest transmission connections processes data to develop a trajectory for deployment of new renewable capacity. Furthermore, EirGrid have engaged with the Sustainable Energy Authority of Ireland (SEAI) who have developed renewable generation forecasts based on judgments from a pool of expert stakeholders. These forecasts have been used in the core assessment in this report.



The results of the assessment notes that from 2025 to 2027, both scenarios (Base and Secure) show the system is outside of standard, meaning additional capacity is required. From 2028 to 2032, the base scenario is within standard, meaning there is sufficient capacity to operate the system under normal conditions. The secure scenario, however, remains outside of standard, meaning an additional 600-800 MW is required to ensure we can continue to balance supply and demand under more challenging conditions. The additional MW capacity is required in the secure scenario to provide system reserve requirements (for when the demand for electricity is high) as well as facilitate network outages (which are needed when we connect new generation and infrastructure to the grid). From 2033 to 2034 both scenarios show the system is outside of standard, meaning additional capacity is required in the range of 100-1000 MW.

EirGrid considers the Secure scenario is most prudent and should be adopted for decisions relating to securing capacity for the continued secure and sustainable operation of the power system.

2.8.8 Ireland's Greenhouse Gas Emission Projections, 2023 – 2050

The Environmental Protection Agency (EPA) are responsible for developing annual national emission projections for greenhouse gases for all key sectors of the economy, including transport.

The EPA's publication entitled Ireland's Greenhouse Gas Emission Projections (2024)¹⁰ provides an updated assessment of Ireland's projected greenhouse gas emissions out to 2050 which includes an assessment of progress towards achieving its 51% emission reduction targets to 2030 set down under the EU Effort Sharing Decision (Decision No 406/2009/EC). Ireland's 2020 target was to achieve a 20% reduction of non-Emission Trading Scheme (non-ETS) sector emissions (i.e. agriculture, transport, the built environment, waste and non-energy intensive industry) on 2005 levels with annual binding limits set for each year beyond 2020. 2030 targets for EU Member States were adopted by the European Council in April 2023. Ireland's 2030 target under the Effort Sharing Regulation is a 42% reduction of emissions compared to 2005 levels by 2030. There will be binding annual limits over the 2021-2030 period to meet that target.

2.8.8.1 *Applicants Response:*

During its operation, the estimated 209,101 MWh (megawatt hours) of electricity per year produced by the Proposed Wind Farm would be sufficient to supply approximately 49,786 Irish households, based on the average Irish household using 4.2 MWh of electricity (this figure is available from the March 2017 CER Review of Typical Consumption Figures Decision). Thus, this energy will be used to offset the same amount of energy that would otherwise be generated through the burning of fossil fuels at power stations.

It is estimated that approximately 79,638 tonnes of CO₂ emissions per annum will be offset due to the Proposed Littleton Wind Farm. As a result, the operational stage of the Proposed Development will have a significant long term positive impact on air quality and climate change, in line with policy and legislation at a local, regional, national and international level.

Further details relating to the positive effects of the Proposed Development on air quality and climate change are included in Chapter 1010 of this EIAR.

¹⁰ [EPA-Ireland's-GHG-Projections-Report-2023-2050.pdf](#)



2.8.9 Climate Change Advisory Council (CCAC) Assessment

In its 2025 Annual Review 'Our Changing Climate in 2024', published on 19th March 2025, the CCAC concluded that, at the current rate of policy implementation is too slow and fragmented, and more effective engagement across all segments of policy and society is required to empower sustainable decision-making and to understand and remove barriers to action.

This stark warning was issued shortly after warning from the Environmental Protection Agency (EPA) in its report 'Ireland's Final Greenhouse Gas Emissions 1990-2022' (2024), which confirmed that Ireland is now tracking a 29% reduction in its greenhouse gas emissions by 2030 compared with its 51% legally binding target.

2.8.9.1 Applicants Response:

The report notes that despite the stark outlook, increased renewable energy generation, from wind solar, if delivered as planned, can reduce Energy Industry emissions by 60 per cent, and achieve over 80 per cent renewable electricity generation by 2030. The Proposed Development has the potential to support the urgent action required as highlighted in the CCAC report and improve the potential rate of delivery to achieve a more rapid fall in emissions in line with targets, which are outlined in section 4.7.66, above.

2.8.10 National Onshore Wind Targets – State of play (Jan 2025)

Published on 16th January 2025, the national onshore wind targets from late 2024 are shown below in a database of projects at various stages of development. These figures give an approximate indication of the *National Onshore Wind Targets – State of play*, and are prepared from sources including ESB Networks and EirGrid documents, and publicly available information sources such as the County Council Planning Portals/An Coimisiún Pleanála (the "Commission").

At the time of the latest update in December 2024, the database indicated that the onshore wind pipeline in Ireland could be summarised in the summary of onshore wind development projects at specific stages in the development process, as shown in Table 2.12, below:

Table 2-12: Summary of Onshore Wind Development Project

Project Phase / Category	MW's
Energised	c. 4,812MW
With planning permission and grid access	c. 717MW (10 projects)
With planning permission and queued for grid access	c. 31
In planning process	c. 1,598MW (30 projects)
Energised but will be 25 years or older in 2030 (Energised in 2005 or before)	c. 500MW

If we take reasonably optimistic assumptions in relation to the various projects noted above, we would optimistically estimate that all currently known projects will deliver c. 7,627MW out of a total target of 9,000MW required by 2030.



Noting the above attrition factors and points below on timing for delivery, this implies that the State needs to see planning applications for c. 3,126MW lodged in the period up to 2026, with an 80% success rate in planning, if the State is to have any chance of delivering on our 9,000MW onshore wind target. It is also important to note that the accelerated delivery of this onshore wind target is critical to achieving compliance with the legally binding sectoral emissions ceilings for the electricity sector.

This above approximate conclusion applies an appropriate attrition factor of between 30% to 35% for on-shore wind projects, which includes projects which may be delayed or cancelled due to failure to obtain planning permission, lack of funding or financial viability, technical challenges related to site suitability or grid connection and community opposition to projects.

2.8.10.1 Applicants Response:

A review of planning applications for on-shore wind in the planning process in Ireland in 2024, show that, for applications submitted to An Coimisiún Pleanála (the "Commission") for example, planning permission was granted for 10 new wind farms with a combined capacity of c. 717 MW, which equates to c. 42% of wind energy needed to meet the target as contained within the Climate Action Plan. In the same period in 2024, An Coimisiún Pleanála (the "Commission") refused planning applications for 12 no. wind farms, with an estimated combined capacity of 677 MW, while 30 projects totalling 1,598 MW were awaiting decision at the end of 2024. There is a clear national mandate to accommodate significant onshore wind within the next decade, c. 1,720 MW of additional wind energy required each year for Ireland to achieve wind energy capacity of 9 GW by 2030.

Since the beginning of 2025, An Coimisiún Pleanála (the "Commission") has approved 11 no. Wind Farm related projects: 1 regarding the repowering of a Wind Farm; 1 pertaining to the continuation of operation of a Wind Farm; and 9 new Wind Farm developments. This facilitates the generation of between 288.4 to 340.2MW of wind energy per annum.

2.8.11 National Energy Security Framework

In response to the European Commission's REPowerEU action statement the Government of Ireland issued the National Energy Security Framework in order to address Ireland's energy security needs in the context of the war in Ukraine. It sets out how Ireland is seeking to phase out dependency on Russian gas, oil and coal imports as soon as possible in order to address the urgent need to secure Ireland's energy supply. It is focused on three key areas of work:

- Reducing demand for fossil fuels, which would seek to reduce overall demand for oil, natural gas and coal in Ireland.
- Replacing fossil fuels with renewables, which would seek to reduce the use of gas, oil and coal in Ireland by replacing it with renewable energy sources such as wind energy, solar energy or bioenergy.
- Diversifying fossil fuel supplies, which would seek to replace any Russian supplies of gas, oil and coal (direct or indirect) with supplies from other sources.



The ambitious programme for government is prioritising carbon neutrality and renewable energy generation. In light of this, it is important for the nation to rely on proven technologies such as onshore wind in order to meet the near and long-term objectives. Furthermore, the *National Energy Security Framework* underlines the importance of new renewable energy generation projects, such as the Proposed Development, in securing Ireland's energy supply in light of the ongoing conflict in Ukraine and associated energy supply chain issues leading to shortages and energy price increases.

2.8.11.1 Applicants Response:

The Proposed Development promotes the generation of renewable energy at an appropriate location and supports the achievement of a low carbon economy by 2050. It seeks to contribute to the nation's target increase of renewable energy from 30% to 80% by 2030 and supports the doubling of onshore wind energy in Ireland by 2030 as set out in the CAP24 and CAP25. The Proposed Development supports national targets of climate change mitigation and reduction in greenhouse gas emissions where significant focus has been set out in the recent *Climate Action and Low Carbon Development (Amendment) Act 2021*.

The proposed Littleton Wind Farm is located within an area zoned as being 'Open for Consideration' within the Tipperary County Development Plan 2022-2028, whilst the grid connection does not form part of the Development for which consent is being sought, it should be supported by Kilkenny County Council in line with the Kilkenny County Development Plan 2021-2027.

It is therefore considered that the Proposed Development at the Littleton Bog is in line with national policy and supports the achievement of national energy and sustainability targets.

2.9 Regional Policies

2.9.1 Southern Regional Spatial & Economic Strategy 2020-2031

The *Southern Regional Spatial & Economic Strategy* (RSES) came into effect on 31st January 2020. The RSES sets out a strategy to implement the NPF at a regional level and covers the period from 2020-2031 and contains a strategic vision which includes actions to mitigate against climate change. The RSES recognises the urgency to transition to a low carbon future, accelerate the transition towards a low carbon economy and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture in order to safeguard and enhance the region's environment through sustainable development, prioritising action on climate change across the region, driving the transition to a low carbon and climate resilient society.

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

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



The RSES includes a range of policy objectives which support the development of renewable energy projects such as the Proposed Development. As outlined in Table 2.13, below, Regional Policy Objectives (RPO's) include the following:

Table 2-13: Regional Spatial and Economic Strategy(RSES) – Regional Policy Objectives (RPO's)

Regional Policy Objective	Description
RPO 50	It is an objective to further develop a diverse base of smart economic specialisms across the rural Region, including innovation and diversification in (among other things) renewable energy as a dynamic driver for the rural economy.
RPO 56	The RSES recognises the urgency to transition to a low carbon future and it is therefore an objective to accelerate the transition towards low carbon economy and circular economy through mechanisms such as the Climate Action Competitive Fund
RPO 95	It is an objective to support implementation of the National Renewable Energy Action Plan (NREAP), and the Offshore Renewable Energy Plan and the implementation of mitigation measures outlined in their respective SEA and AA and leverage the Region as a leader and innovator in sustainable renewable energy generation.
RPO 99	It is an objective to support the sustainable development of renewable wind energy (on shore and offshore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.
RPO 100	Facilitate the delivery of the renewable energy targets of the Climate Action Plan and the National Energy and Climate Plan by supporting the development of electricity generation from renewable sources."
RPO 101	Support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned renewable energy developments and interconnection."

As described within the relevant RSES objectives as shown in Table 22-6 above, it is recognised that the region has a rich natural energy resource, with the RSES demonstrating that the region is open to renewables energy developments and recognises the required transition from fossil fuels to the use of renewables. The strategy further notes that this can contribute to new employment, community sustainability and attract additional people to the region.



2.9.1.1 Applicants Response:

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

2.10 Local Policy

2.10.1 Tipperary County Development Plan 2022 – 2028

The Tipperary County Development Plan 2022-2028 (TCDP) is a statutory document prepared by the Planning Authority in accordance with the requirements of the Planning & Development Act 2000 (as amended) and the Planning & Development Regulations 2001 (as amended). Adopted on 22nd August 2022, the current TCDP covers the period from 2022-2028, and recognises that it is essential for a pro-active approach in which the challenges posed by climate change are integrated into the development of policies, plans and programmes. The TCDP recognises the importance of investing in the green economy including employment creation in emerging sectors such as renewable energy. The TCDP states that a sustainable approach to economic development complements the core strength of the economy in the use of natural resources. Key drivers of the growth of the Green Economy globally include emissions reduction targets, increasing fossil fuel prices, diminishing natural resources, the impact of climate change, environmental legislation and consumer preferences.

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

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

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

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



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

Table 2-14: The Policies and Objectives of the Tipperary County Development Plan 2022 – 2028 applicable to the Proposed Development

Planning Policy	Description
Policy 3-1	Promote and facilitate renewable energy development, in accordance with the policies and objectives of the Tipperary Renewable Energy Strategy 2016 (and any review thereof), and the Tipperary Climate Adaptation Strategy 2019.
Policy 3-6	Support new construction and development forms that use a low embodied carbon approach, and where the full life-cycle carbon, and other environmental impacts are calculated to support the lowest possible energy and CO2 emissions.
Policy Objective 3-A	Support and facilitate the implementation of European and National objectives for climate adaptation and mitigation, and to prepare a Climate Action Plan for Tipperary in compliance with the Climate Action and Low Carbon Development (Amendment) Bill (DECC, 2020) and any review thereof.
Policy Objective 3-C	Support and participate in the preparation of a Regional Decarbonisation Plan for the Southern Region as part of a framework for action on decarbonisation across all sectors.
Policy Objective 3-E	Support, in collaboration with stakeholders, research and innovation in smart renewable energy technologies and initiatives to accelerate diversification away from fossil fuels
Policy Objective 3-I	Support projects which assist the transition of industrial cut-over peatlands to sustainable after uses.
Applicants Response: This Application brings forward an ambitious proposal to build a Wind Farm on a site which has historically been the subject of peat extraction. As outlined above, the Proposed Development will actively contribute towards achieving European and National objectives and targets related to climate change and renewable energy. Furthermore, it is also aligned to the Renewable Energy Strategy discussed in Chapter 4.6.2 of this Chapter. As such, it can be considered to be in line with many of the above policies, in particular Policy 3-1 and Policy Objective 3-A. As referenced, the Proposed Development is located on the Littleton Bog which is historically associated with industrial scale peat extraction activity until it ceased in c. 2017. This will facilitate the transition of this bogland away from peat related activity to a sustainable renewable energy use (which can be considered a sustainable after use). A series of other items including, <i>inter alia</i>, Biodiversity Enhancement Measures and recreational trails and amenities are also proposed in this Application. This emphasises the Applications compliance with Policy Objective 3-I which seeks to support projects which facilitate in this transition away from industrial cut-over peatlands to sustainable after uses. In conclusion, the Proposed Development is in compliance with the above mentioned policies.	
Policy 10-1	Support and facilitate new development that will produce energy from local renewable sources such as hydro, bioenergy, wind, solar, geothermal and landfill gas, including renewable and non-renewable enabling plant, subject to compliance with normal planning and environmental criteria, in co-operation with statutory and other energy providers. The provisions of the Tipperary Renewable Energy Strategy (and any review thereof) as set out in Volume 3, will apply to new development.



Planning Policy	Description
Policy Objective 10-A	Support the Climate Action Plan (DECC, 2019) as it relates to renewable energy production, having consideration to the strategic importance and potential benefits of renewable energy investment to rural communities.
Policy Objective 10-C	To continue to support renewable energy development and to maintain a positive framework for development through the review of the Renewable Energy Strategy over the lifetime of the Plan
Applicants Response: This Application relates to a Proposed Wind Farm Development. As outlined in the Sections below, it aligns with the provisions of the Tipperary Renewable Energy Strategy. Wind farms play a vital role in Ireland’s push to meet national climate targets and strengthen energy security. By producing clean electricity, they cut greenhouse gas emissions and reduce reliance on fossil fuels. Expanding onshore and offshore wind capacity also lowers our depending on imported energy, enhancing Irelands energy security and protecting households from volatile global prices. This shift also supports Ireland’s legally binding climate targets while ensuring a more stable and affordable energy supply. Wind energy is now widely considered as the backbone of Ireland’s renewable strategy, delivering both environmental progress and greater energy independence. In conclusion, the Proposed Development is in compliance with the requisite policy and will further contribute towards Ireland’s renewable energy targets and ambitions.	
Policy 11-1	In assessing proposals for new development to balance the need for new development with the protection and enhancement of the natural environment and human health. In line with the provisions of Article 6(3) and Article 6 (4) of the Habitats Directive, no plans, programmes, etc. or projects giving rise to significant cumulative, direct, indirect or secondary impacts on European sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan (either individually or in combination with other plans, programmes, etc. or projects ¹¹)
Policy 11-2	Ensure the protection, integrity and conservation of European Sites and Annex I and II species listed in EU Directives. Where it is determined that a development may individually, or cumulatively, impact on the integrity of European sites, the Council will require planning applications to be accompanied by a NIS in accordance with the Habitats Directive and transposing Regulations, ‘Appropriate Assessment of Plans and Projects, Guidelines for Planning Authorities’, (DEHLG 2009) or any amendment thereof and relevant Environmental Protection Agency (EPA) and European Commission guidance documents.
Policy 11-3	Ensure the conservation and protection of existing, and proposed NHAs, and to ensure that proposed developments within or in close proximity to an existing or proposed NHA would not have a significant adverse impact on the status of the site as described.
Policy 11-4	(a) Conserve, protect and enhance areas of local biodiversity value, habitats, ecosystems and ecological corridors, in both urban and rural areas, including rivers, lakes, streams and ponds, peatland and other wetland habitats, woodlands, hedgerows, tree lines, veteran trees, natural and semi-natural grasslands in accordance with the objectives of the National Biodiversity Plan (DCHG 2017) and any review thereof.

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



Planning Policy	Description
	(b) Safeguard, enhance and protect water bodies (rivers/canals/lakes) and river walks and to provide links, where possible, to wider green infrastructure networks as an essential part of the design process. (c) Require an 'Ecosystems Services' approach for new development to incorporate nature-based solutions to SUDS, in so far as practical, as part of water management systems, public realm design and landscaping, in line with best practice. (d) Where trees or hedgerows are of particular local value, the Council may seek their retention, or where retention is not feasible, their replacement and will seek a proactive focus on new tree-planting as part of new development.
Policy 11-5	Ensure that new developments proposed in or near 'Ground Water Protection Schemes' and 'Zones of Contribution' which contribute to public water supplies, do not result in a significant negative impact on the integrity, function and management of these important assets
Policy 11-7	a) Ensure the protection of water quality in accordance with the EU WFD, and support the objectives and facilitate the implementation of the associated Programme of Measures of the River Basin Management Plan 2018-2021 and any successor. This includes contributing towards the protection of Blue-Dot catchments and drinking water resources. Also, have cognisance of the EU's Common Implementation Strategy Guidance Document No. 20 and 36 which provide guidance on exemptions to the environmental objectives of the WFD. b) Support an integrated and collaborative approach to catchment management in accordance with the River Basin Management Plan 2018-2021 and any successor. c) Require an undisturbed edge or buffer zone to be maintained, where appropriate, between new developments and riparian zones of water bodies to maintain the natural function of existing ecosystems associated with water courses and their riparian zones, and to enable sustainable public access.
Policy 11-9	Assess all new developments (both within and without designated Flood Risk Zones) in line with the 'Staged Approach' and pre-cautionary principle set out in the Planning System and Flood Risk Management Guidelines for Planning Authorities, (DEHLG, 2009) and any amendment thereof, and the following: (a) Require the submission of site-specific Flood Risk Assessments for developments undertaken within Flood Zones A & B and on lands subject to the mid-range future scenario floods extents, as published by the OPW. These Flood Risk Assessments shall consider climate change impacts and adaptation measures including details of structural and non-structural flood risk management measures, such as those relating to floor levels, internal layout, flood-resistant construction, flood-resilient construction, emergency response planning and access and egress during flood events. (b) SFRAs and site-specific flood risk assessments shall provide information on the implications of climate change with regard to flood risk in relevant locations. The 2009 OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management (or any superseding document) shall be consulted with to this effect. (c) Ensure each flood risk management activity is examined to determine actions required to embed and provide for effective climate change adaptation as set out in the OPW Climate Change Sectoral Adaptation Plan for Flood Risk Management applicable at the time. (d) Applications for development on land identified as 'benefitting land' may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas.



Planning Policy	Description
	(e) Require applications for new development, or for an extension to an existing development on land zoned for 'Social and Public' or 'Amenity' use and where a potential flood risk is identified, and where the proposed use might be vulnerable, to be subject to site-specific flood risk assessment to the satisfaction of the Council.
Policy 11-10	(a) Flood risk assessments shall incorporate consideration of climate change impacts and adaptation measures with regard to flood risk, and, (b) Flood risk management planning shall determine actions to embed and provide for effective climate change adaptation as set out in the OPW 'Climate Change Sectoral Adaptation Plan for Flood Risk Management' applicable at the time.
Policy 11-15	Support the diversification of peatlands, whilst ensuring the protection of their ecological, archaeological, cultural and educational significance in line with the National Peatlands Strategy (DAHG 2015). The Council may request landowners to prepare a 'Peatland Master Plan', especially for areas of industrial cut-over peatland, and will work with all stakeholders involved in the process in this regard. Any Masterplan should identify any significant tourism, amenity and recreation potential of these lands.
Policy 11-16	Facilitate new development which integrates and respects the character, sensitivity and value of the landscape in accordance with the designations of the Landscape Character Assessment, and the schedule of Views and Scenic Routes (or any review thereof). Developments which would have a significant adverse material impact on visual amenities will not be supported
Policy 11-17	Ensure the protection of the visual amenity, landscape quality and character of designated 'Primary' and 'Secondary' amenity areas. Developments which would have a significant adverse material impact on the visual amenities of the area will not be supported. New development shall have regard to the following: a) Developments should avoid visually prominent locations and be designed to use existing topography to minimise adverse visual impact on the character of primary and secondary amenity areas. b) Buildings and structures shall integrate with the landscape through careful use of scale, form and finishes. c) Existing landscape features, including trees, hedgerows and distinctive boundary treatment shall be protected and integrated into the design proposal.
Policy 11-18	Ensure that new development does not result in significant noise disturbance and to ensure that all new developments are designed and constructed to minimise noise disturbance in accordance with the provisions of the Noise Action Plan 2018 and relevant standards and guidance that refer to noise management
Policy 11-19	Ensure that new development does not result in significant disturbance as a result of light pollution and to ensure that all new developments are designed and constructed to minimise the impact of light pollution on the visual, environmental and residential amenities of surrounding areas.
Applicants Response: Chapter 11 – Environment and Natural Assets of the Tipperary County Development Plan 2022 – 2028 outlines an extensive amount of policy with respect to Environmental Assessment and the Local Authorities ambitions for the future of the County. It also outlines development management standards for the preservation of the County's environment. The Proposed Development is fully compliant with each and every one of the above policies, each of which have been addressed by various chapters throughout this EIAR which are robustly supported by the requisite and appropriate studies (for example a Flood Risk Assessment supports the Hydrology, Hydrogeology and Water Quality Chapter).	



Planning Policy	Description
Policy 12-2	Require new trip intensive developments to prepare and submit 'Mobility Management Plans' as part of their planning application, in line with the requirements of the Development Management Standards set out in Volume 3. An assessment of likely transport demand, and modal split shall be established, to enable a programme of monitoring as part of the Mobility Management Plan.
Policy 12-4	Maintain and protect the safety, capacity and efficiency of Tipperary's roads network and associated junctions in accordance with the Spatial Planning and National Roads Guidelines for Planning Authorities, (DECLG, 2012) and the Trans-European Networks Regulations and to avoid the creation of additional access points to national roads to which speed limits greater than 60kmh apply.
Applicants Response: Chapter 15 of the EIAR contains all information in relation to the Proposed Development's Impact on Traffic and Transport. As evidenced in this Chapter no significant effects on Traffic and Transport will arise from the Proposed Development and as such it is in line with the above policy.	
Policy 13-1	Safeguard sites, features and objects of archaeological interest, including Recorded Monuments, National Monuments and Monuments on the Register of Historic Monuments, and archaeological remains found within Zones of Archaeological Potential located in historic towns and other urban and rural areas. In safeguarding such features of archaeological interest, the Council will seek to secure their preservation (i.e. in situ or in exceptional circumstances preservation by record) and will have regard to the advice and recommendation of the Department of Arts, Heritage and the Gaeltacht. Where developments, due to their location, size or nature, may have implications for archaeological heritage, the Council may require an archaeological assessment to be carried out. This may include for a requirement for a detailed Visual Impact Assessment of the proposal and how it will impact on the character or setting of adjoining archaeological features. Such developments include those that are located at, or close to an archaeological monument or site, those that are extensive in terms of area (1/2 ha or more) or length (1 kilometre or more), those that may impact on the underwater environment and developments requiring EIA
Applicants Response: Chapter 14 of the EIAR outlines all information in respect of Archaeological, Architectural and Cultural Heritage Considerations and proposes any appropriate mitigation measures. As detailed in this Chapter, the main concentration of identified archaeological sites identified during archaeological investigations associated with the bogs Peat Extraction are located in a narrow section of bog in the northern half of the Site. The mitigation measures presented in Section 14.5.1 of Chapter 14 will provide for either the avoidance of the potential unrecorded, sub-surface archaeological resource within the footprint of proposed development locations or the proper and adequate recording of this resource by full archaeological excavation. Preservation in situ shall allow for a negligible magnitude of impact resulting in a potential not significant/imperceptible significance of effect in the context of residual impact on the unrecorded archaeological resource. Preservation by record shall allow for a high magnitude of impact, albeit ameliorated by the creation of a full and detailed archaeological record, the results of which shall be publicly disseminated. This shall result in a potential slight to moderate range of significance of effect in the context of residual impacts on the unrecorded archaeological resource. In conclusion, while the full details of the Proposed Developments impact on Archaeological, Architectural and Cultural Heritage Considerations are outlined in Chapter 14 of the EIAR, it is evident that Recorded Monuments, known archaeological remains, zones of notifications have been safeguarded and avoided.	



2.10.2 Tipperary Renewable Energy Strategy (RES)

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

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

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

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

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

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

- *"Wind Energy Policy Areas of Adjacent Local Authorities: The approach to planning policy for wind energy in adjoining Local Authority areas was considered. Availability and method of grid connection,*
- *Planning Application Review: The pattern of current wind development in Tipperary and adjacent areas was considered: identifying granted, pending and refused applications.*
- *Wind Energy Potential: Areas where commercial development of wind energy resources is viable were identified.*
- *Landscape Character Assessment: The outcome of the LCA and how it influences this Wind Energy Strategy was considered.*
- *Electricity Transmission Network: The capacity and accessibility to the existing and planned electricity transmission network and distribution grids were look at in relation to how they might constrain future wind energy development.*
- *Settlement Pattern and Population Densities: Settlement pattern and population densities were studied in relation to minimising the residential impact of wind energy development.*
- *Scenic Routes and Landscape Amenity Designations: The impact of wind farm development on scenic and amenity areas were considered.*



- *Landslide Susceptibility: A preliminary review of landslide risk areas based on slope and soil type was undertaken.*
- *Ecological & Natural Heritage Designations: Consideration was taken of the policy objectives and obligations in relation to any development in these areas.*
- *Architectural & Archaeological Heritage: Have consideration of the policy objectives and obligations in relation to any development in these areas.*
- *Water Framework Directive: Have consideration of the policy objectives and obligations in relation to Freshwater Pearl Mussel Catchments.*
- *Animals and Horses: Take into consideration*
- *Cumulative Impact: Consider the combined effect of all existing/granted wind farm developments in conjunction with the proposed wind energy development areas being considered under this Wind Energy Strategy process to determine if any area has an over-concentration of development."*

2.10.2.1 Site Zoning

Map 11 of the WES identifies Areas Unsuitable for New Wind Energy Development and Areas Open for Consideration for New Wind Energy Development. The Proposed Development is located in an area zoned as 'Open for Consideration' for Wind Energy Developments (as identified by the red star on Figure 2.2 below).

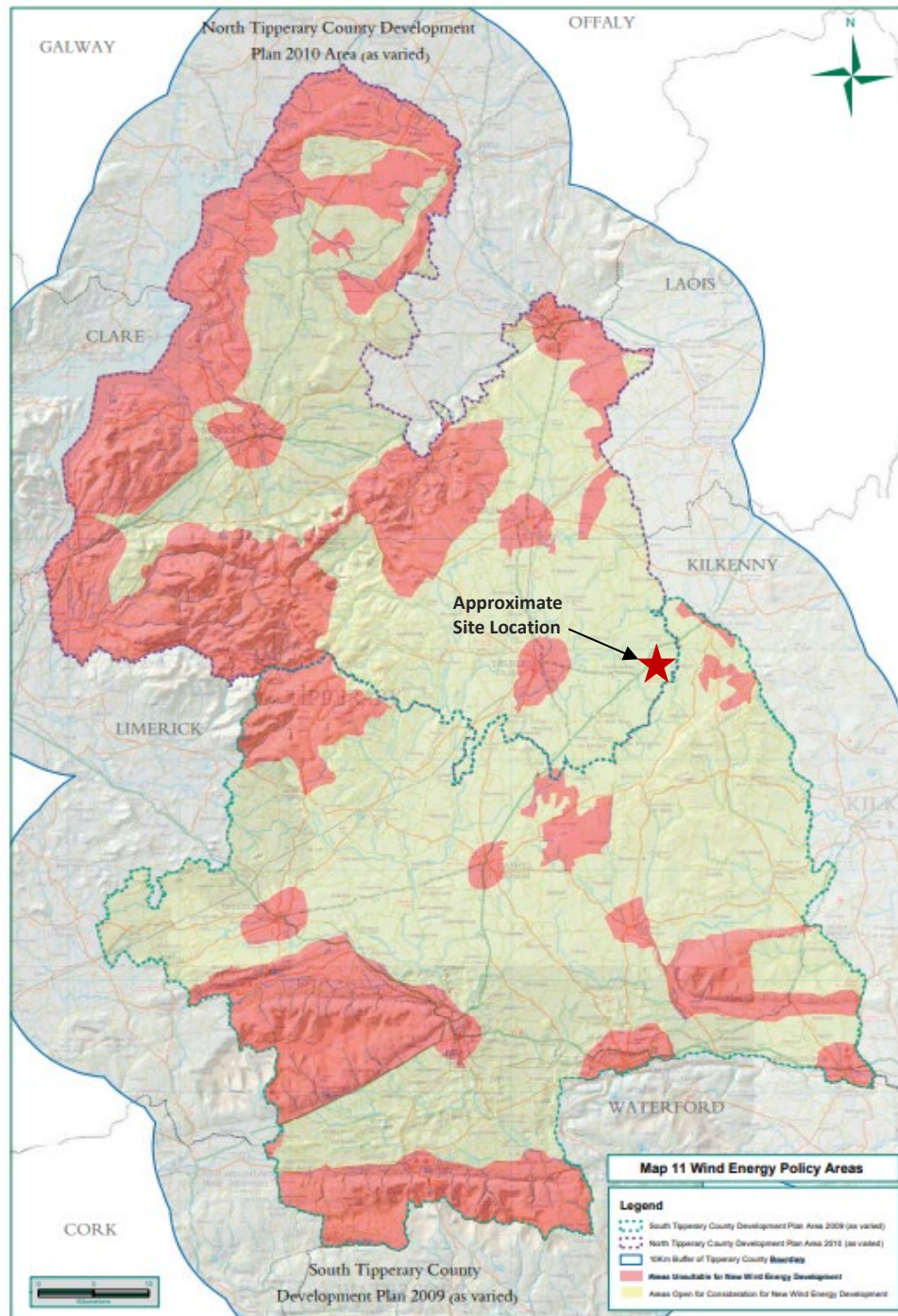


Figure 2-2: Map 11 of the Tipperary Wind Energy Strategy contained within the Tipperary Renewable Energy Strategy (Source: Tipperary County Development Plan 2022 – 2028, annotated by Fehily Timoney and Company, 2025)

Please refer to Figure 2.3 below which outlines the Planning Applications received to date by Tipperary County Council and the areas unsuitable, open for consideration and preferred for wind energy development. The Proposed Development is located in an area deemed 'Open for Consideration', with multiple clusters of Wind Farms (operational, granted, or under consideration) located to the north and south of the site.

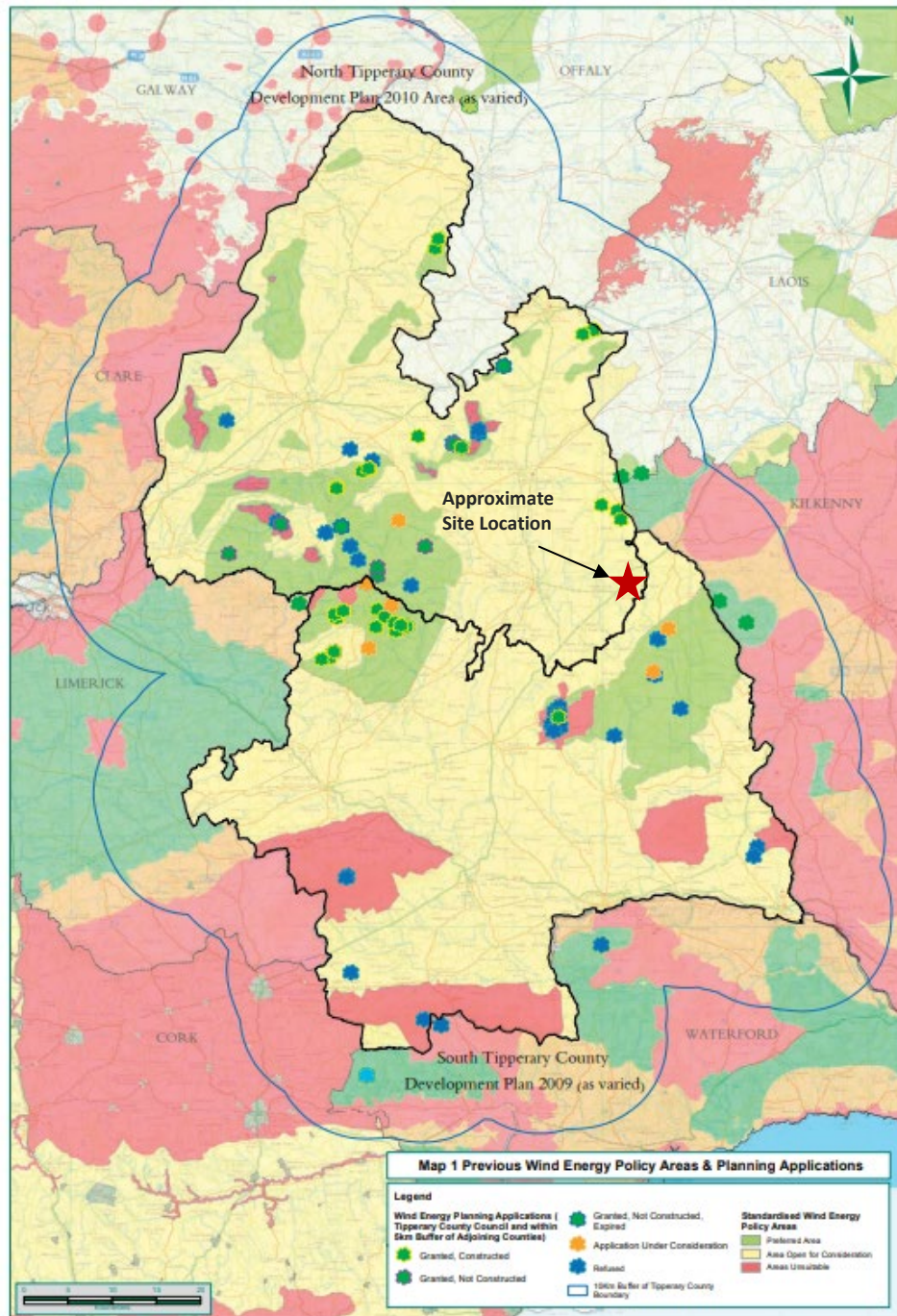


Figure 2-3: Map 1 of the Tipperary Wind Energy Strategy contained within the Tipperary Renewable Energy Strategy (Source: Tipperary County Development Plan 2022 – 2028, annotated by Fehily Timoney and Company, 2025)

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



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

Table 2-15: The Overarching Policies of the Tipperary Wind Energy Strategy 2016 – contained within the Tipperary County Development Plan 2022 – 2028

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

The Proposed Development, which is further detailed in Chapter 44: Development Description, has been designed in accordance with all of the appropriate National, Regional and Local Legislative requirements including, inter alia, the Wind Energy Development Guidelines, Guidelines for Planning Authorities 2006 and the Tipperary County Development Plan 2022 – 2028 as described in detail throughout this Chapter. Additionally, a full suite of environmental assessments have been prepared for this Planning Application including an Environmental Impact Assessment Report (this document) and Natura Impact Statement which demonstrate that the Proposed Development will have no significant effects on the environment.

As such, we believe that the Proposed Development is in accordance with the Proper Planning and Sustainable Development of the region and also in line with the abovementioned policies of the Tipperary WES.



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

Table 2-16: The Policies and Objectives of the Tipperary Wind Energy Strategy 2016 and the Project Response to each.

Policy/ Objective	Description	Chapter and Description of how the Policy has been addressed
TWIND 4.1	Proposals shall demonstrate conformity with existing and approved wind farms to avoid visual clutter. In this respect, developers should consider the cumulative impact of new development in the context of the location of both existing and permitted developments.	Please refer to Chapter 13 of the EIAR which contains a full Landscape and Visual Impact Assessment.
TWIND 4.2	Proposals in Areas ‘Open for Consideration’ shall be sited having consideration to the landscape sensitivity and capacity analysis set out in the Tipperary Landscape Character Assessment 2016 and the provisions of the County Development Plan (as varied) in relation to landscape (Chapter 7). All applications shall have regard to the visual impact of turbines and ancillary development (such as access roads, boundary fencing, control buildings and grid connections).	Please refer to Section 2.6.3 of Chapter 2 of EIAR which outlined extensively the
TWIND 4.3	Within Areas ‘Open for Consideration’, proposed development within areas which already accommodate turbines, sub-stations and powerlines shall be considered appropriate from a sequential approach to the development of infrastructure, until these areas reach capacity.	The Proposed Development is located in an area that has been extensively developed by Wind Farms as evidenced in the list of Cumulative Assessments. Of particular note is the Lisheen Wind Farm Developments (1,2,3 and the outstanding Phase 4) located c. 15km to the North of the Site. However, it is of importance to note the lack of such development in the immediate vicinity of the Site. As such, we believe there is capacity within the area where the Proposed Development is located and that it forms part of the sequential approach to the development of the area and its infrastructure.
TWIND 4.4	All Projects are required to be screened for Appropriate Assessment Screening in accordance with Article 6(3) of the Habitats Directive and the provisions of the County Development Plan (as varied).	Please refer to the Natura Impact Statement (NIS) that accompanies this Application.



Policy/ Objective	Description	Chapter and Description of how the Policy has been addressed
TWIND 4.5	Applications for wind development shall be accompanied by a technical assessment in relation to the slope stability, landslide susceptibility of the development site and the proposed project. This assessment shall incorporate slope stability mapping and groundcover assessment in the context of potential cumulative effects arising from multiple developments.	Please refer to Chapter 8 of the EIAR which addresses the land, soils and geology of the Site. This includes details of peat probing and a landslide susceptibility report which address this policy in full.
TWIND 4.6	All proposals for wind energy development will have regard to the cumulative effect of the development on the environment when considered in conjunction with other existing and permitted wind energy developments in the area.	This has been addressed in all chapters throughout the EIAR. The list of developments identified for cumulative assessment are outlined in Chapter 2 of the EIAR, and detailed in each chapter as appropriate.
TWIND 4.7	All applications will have regard to the impact on existing built environment, particularly neighbouring residential properties and other sensitive amenity areas.	This has been addressed in a number of chapters throughout the EIAR, in particular Chapter 5, and 11. Due consideration has been given to sensitive receptors, with the Proposed Development designed to avoid effect on same. Additionally, extensive community consultation has been undertaken by the Design Team and Applicant throughout the preparation of the Proposed Development. This is outlined in Chapter 2 (this Chapter, please refer to Section 2.4)
TWIND 4.8	All applications will have regard to the impact of any proposal for wind energy development on surrounding tourism and recreational related activities and the compatibility of same will be carefully considered in the assessment of any planning application.	This has been addressed in Chapter 5 of the EIAR. It outlines how the Design Team has carefully considered nearby recreational and tourism amenities. Additionally, amenity tracks and amenities are proposed as part of the Development. Please refer to Chapter 4 for further information on these.
TWIND 4.9	All applications will have regard to the impact of any proposal for wind energy development in the context of any flood risk in the area. A comprehensive flood risk assessment for proposals in an area at risk of flooding, adjoining same or where cumulative impacts may result in a flood risk elsewhere, in low lying areas or in areas adjacent to streams.	This has been addressed in Chapter 9 of the Proposed Development which included a Flood Risk Assessment.



Policy/ Objective	Description	Chapter and Description of how the Policy has been addressed
TWIND 4.10	All applications will ensure that details of the proposed grid connection and all associated infrastructure are considered in the Environmental Impact Statement (EIA) and Natura Impact Statement as may be required.	The Grid Connection and all associated infrastructure have been fully assessed as part of the EIAR and the NIS. Additionally, they have formed part of any consultation meetings, Scoping Exercises, and the Statutory Notices accompanying this Application.
TWIND 4.11	All applications will have regard to the impact on rivers and streams and will demonstrate compliance with the Water Framework Directive.	This has been addressed in Chapter 9 of the EIAR. Additionally, a full list of any proposed WFD Water Course Crossings is outlined in Chapter 4.
TWIND 4.12	Wind energy development proposed in areas of lowland raised bog/peatland shall ensure that negative impacts including habitat disturbance and loss, and avoidance of hydrological disruption and risk of erosion are avoided or mitigated through design. Site specific geo-technical investigations shall be submitted as part of EIA unless otherwise agreed with the council.	This has been addressed in multiple Chapters of the EIAR, including Chapter 6, 8, and 9 as well as the NIS. These assessment and investigations have been fully detailed in the abovementioned Chapters which form part of this Planning Application.

As outlined above, this Application contains an Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) which assess the Proposed Development?. The purpose of these assessments is to identify and evaluate the likely significant effects of a proposed development on the environment. It ensure that environmental considerations – such as effects on air, water, biodiversity, climate, population and human health – are fully understood and integrated into the planning process to support the competent authority in making an informed decision. Many of the above outlined policies refer to aspects of these assessments, and as such a cross reference to the appropriate location where they are addressed and a brief summary of how they have been addressed is included in Table 2.8 above.

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



2.10.3 Landscape Character Assessment

2.10.3.1 Introduction and Definitions

The Tipperary Landscape Character Assessment and Schedule of Views and Routes (hereafter referred to as the Chapter) is contained in Volume 3, Appendix 3 of the *Tipperary County Development Plan 2022 – 2028*. The Chapter provides a structured framework for understanding, protecting and enhancing the county's distinctive landscapes. The purpose of the plan is to identify key scenic corridors, vantage points, and landscape features so that future development and infrastructure projects can be accommodated in a way that is sensitive and appropriate whilst also respecting the local character, safeguards visual amenity and promoting the sustainable enjoyment of the regions natural and cultural heritage.

The begins by defining 4 Landscape Character Areas (LCA) namely: 'The Plains', 'The Lakelands', 'The Foothills', and 'The Uplands' (as outlined in Figure 2.4 below). The Proposed Development falls within the Plains Landscape Character Area which is defined as:

"These are working landscapes containing most settlements and services as well as large continuous areas used for pasture, tillage and peat harvesting. This landscape also contains major rivers and many historic sites."

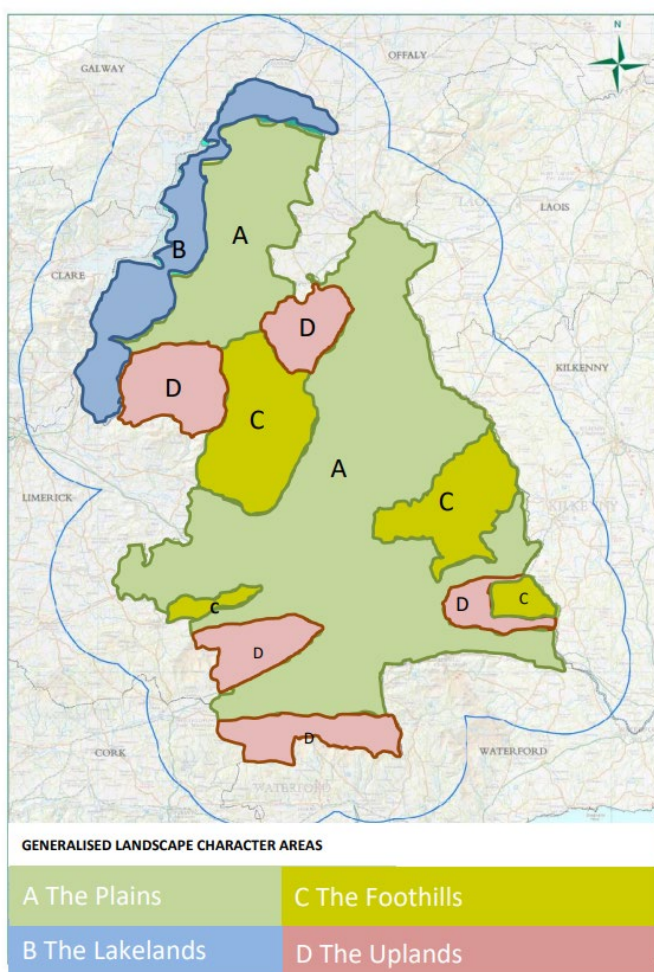


Figure 3.2 Generalised Landscape Character Areas

Table 3.2 Derivation of Landscape Character Areas		
Archetypes	Landscape Character Types	Landscape Character Areas
A.The Plains	A1 Lowland Pasture & Arable	1.Urban and Fringe Areas
		2. Thurles Hinterland
		3. Nenagh Corridor
		4.River Suir Central Plain / Nenagh Corridor
		5. Templemore Plains
		6. West Tipperary Farmland mosaic
	A2 Peatlands & Wet Mixed Farmland	7. Borrisokane Lowlands
		8. Littleton Raised Bog
		9. Littleton Farmland Mosaic and Marginal Peatland

Figure 2-4: The four generalised Landscape Character Areas as presented in the Landscape Character Assessment and Schedule of Views and Routes.



The Plains area is subsequently subdivided into two sections: ‘A1 Lowland Pasture and Arable’ and ‘A2 Peatlands and Wet Mixed Farmland’, with the Littleton Bog being explicitly named in section A2. As such the Proposed Development falls within the A2 Peatlands and Wet Mixed Farmland area which is described as:

“A landscape which occurs in separate compartments within the plains. There is a lower intensity of farming in these areas – resulting in fewer houses and roads and more areas of natural vegetation”.

A general description of the Littleton Bog LCA is also given, with the area being described as:

“A distinctive raised bog area, this extends eastwards from the N8 where it meets the county boundary with Kilkenny. The raised bog is set within an overall landscape not dissimilar to the undulating lowland of the Thurles hinterland.”

2.10.3.2 Drivers of Change and Landscape Impacts

The Chapter details the likely drivers of change and their impacts on the 4 LCA’s identified above. These impacts are outlined in the table below (a screenshot from the Chapter in the Tipperary County Development Plan 2022 – 2028).

2.4 CHANGING LANDSCAPES- DRIVERS OF CHANGE

Table 2.1 Likely drivers of change and likely landscape effects

FACTOR	LIKELY DRIVER OF CHANGE	LIKELY LANDSCAPE EFFECTS			
		Uplands	Lakelands	Foothills	Plains
Agriculture	Agricultural Intensification	Very High	High	Moderate	Very Low
	Agricultural Diversification	Moderate	Low	Low	Low
	Agricultural Contraction	Very High	Very Low	High	Moderate
Settlement	Existing Rural Housing	Moderate	Moderate	Low	Very Low
	New Rural Housing	Very High	Very High	High	Moderate
Urbanisation	Urban Expansion	Very High	High	Very High	Moderate
	Urban Support Uses- Amenities	Moderate	Low	Low	Low
	Urban Support Uses- Extraction	Very High	High	Moderate	Low
	Urban Support Uses- Enterprise	Very High	Very Low	High	High
Infrastructure	Transportation	High	Very High	Moderate	High
	Energy - Large Transmission Lines	Very High	Very High	Moderate	Moderate
	Energy – Wind Farms	Very High	Very High	High	High
	Energy – Solar Farms	High	Moderate	Moderate	Low
	Water Services	Moderate		Low	Low

Figure 2-5: A screenshot of the Likely Drivers of Change and their associated Likely Landscape Effects on each of the four identified LCAs. (Source: Tipperary County Development Plan 2022 – 2028, annotated by Fehily Timoney and Company 2025.)



As highlighted, Wind Energy Developments are identified as a likely driver of change and the likely landscape effects are identified amongst the highest across all 4 LCA's, which isn't uncommon given the scale of such a development type. The Proposed Development is located within the Plains area, and the likely landscape impacts are identified as 'high' which, with respect of Wind Energy Development, is the lowest level of effect identified. The Chapter further details that:

"Tipperary is already one of the country's leading producers of Renewables – this pattern is set to continue and is provided for in the Wind Energy Strategy that accompanies this LCA. To date these have been concentrated in uplands and cut-over bogs."

2.10.3.3 Applicant's Response

The Applicant notes that the Proposed Development is located on the Littleton and Lanespark Bogs, and as such is consistent with the approach and locations of Wind Energy Development across the county to date. Furthermore, it should be noted that the Proposed Development is located within an LCA where the likely landscape effects, although high, are at their lowest with respect to such a development type.

Nonetheless, the Proposed Development has been subject to extensive Landscape and Visual Impact Assessment, as outlined in Volume II, Chapter 13 of the EIAR and designed in a way that is sensitive and respectful of the surrounding environs.

2.10.3.4 Landscape Sensitivity, Objectives and Guidelines

The Chapter defines 'Landscape Sensitivity' as:

"A landscape's capacity to absorb new development, without exhibiting a significant loss of character or change of appearance is referred to as it's 'sensitivity'. This depends on factors that include elevation, slope, as well as the types of land-cover and soil. The area is classified as being increasingly sensitivity as more of these factors are present in the same place"

It subsequently identifies 6 classes with respect to Landscape Sensitivity from 1 to 6, with 0 representing a landscape that is highly capable of facilitating development and 6 representing a unique landscape that is extremely sensitive to change and for the most part incapable of accommodating development. Each of the which are outlined below:

1. Class Zero: Could be improved by change
2. Class One: Low sensitivity to change
3. Class Two: Moderate Sensitivity to Change
4. Class Three: High sensitivity to change
5. Class Four: Special Landscape – very low capacity for change
6. Class Five: Change would alter the character to the landscape.

These classes are further discussed in Table 5.1 of the *Tipperary County Development Plan 2022 – 2028*, this has been inserted below.



Table 5.1 Objectives and Policies for Types of Landscape Sensitivities						
Factor	Sensitivity	Capacity	Key	Description	Objective	Guideline
-1	<i>Robust</i> Class 0	Very High		Areas lacking normal features with disturbance, brownfield and significant development	Improve	Encourage development that will improve the appearance and character of the area.
1	Normal Class 1 Low Sensitivity to Change	High		Working landscapes with no sensitivities and established patterns of use and settlement	Continue	Facilitate development that continues established patterns of use and settlement
2	<i>Transitional Sensitivity</i> Class 2: Moderate sensitivity to change	Reduced		Areas requiring additional care during design and assessment to continue established patterns of use and settlement	Enhance	Facilitate development that with capacity to continue and enhance established patterns of use and settlement without significant change to appearance or character
3	Sensitive Class 3 High sensitivity to change	Limited		Areas requiring significant additional care during design and assessment of alternatives to determine how established patterns of use and settlement can be accommodated	Wise Use Best Choice	Facilitate development that conclusively demonstrates wise use and best choices to continue and enhance established patterns of use and settlement without significant change to, or loss of, appearance or character.
4	<i>Transitional Vulnerability</i> Class 4: Special Landscape – Very low capacity for change	Low		Areas requiring significant care during design and assessment – including consideration of alternatives - to determine whether development or use can be accommodated without causing significant change of appearance or character	Control	Control unavoidable new developments or uses unless it can conclusively demonstrate capacity to conform to existing appearance and character. Control the unavoidable intensification or expansion of established patterns of use and settlement to sustain existing appearance and character
5	Vulnerable Class 5 Unique – Change would alter the character to the landscape	Very Low		Areas to be avoided on account of a very significant potential for change of appearance or character due to the presence of development or use.	Control	Control unavoidable new developments or uses, or the intensification or expansion of established patterns of use and settlement - unless they can demonstrate capacity to sustain existing appearance and character

Figure 2-6: A screenshot of Table 5.1 of the Landscape Character Assessment and Schedule of Views and Routes which outlines the policies and objectives for the types of landscape sensitivities.



2.10.3.4.1 Identifying the Sensitivity of the Application Site

Figure 2.7 below (which is Figure 5.4 of the Landscape Character Assessment and Schedule of Views and Scenic Routes) identifies the general sensitivity of areas with Figure 2.6 (which is an extract from Table 5.2 of the same documents) identifying the dominant sensitivity rating.

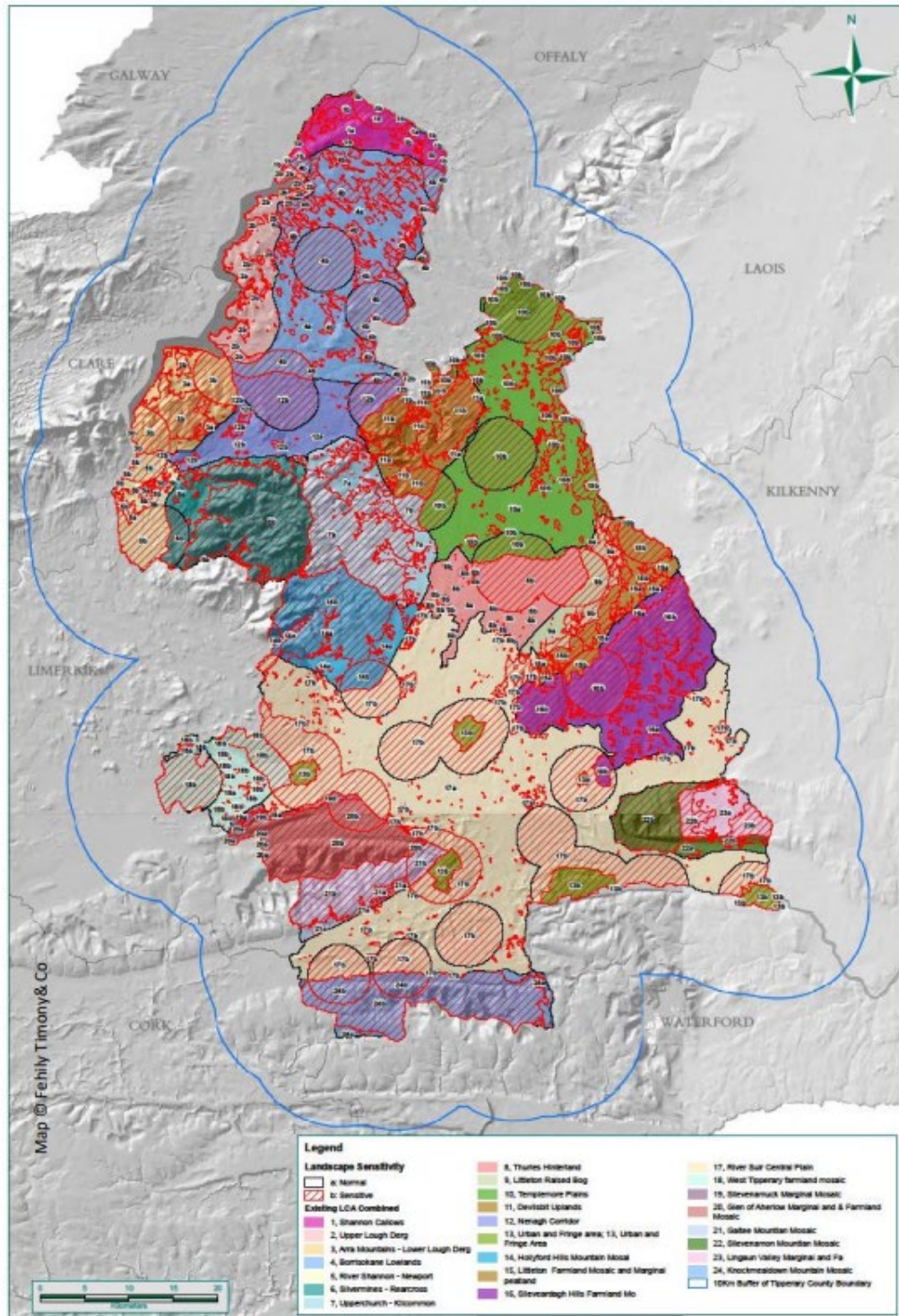


Figure 2-7: The Landscape Character Area Sensitivity Mapping contained in the Landscape Character Assessment and Schedule of Views and Routes.



Table 5.2 Sensitivity Rating of Landscape Character Areas		Range of sensitivity with a dark outline for the dominant sensitivity					
		Robust	Normal	Transitional Sensitivity	Sensitive	Transitional Vulnerability	Vulnerable
A. The Plains							
Lowland Pasture & Arable	Urban and Fringe Areas [1]	Class 0					
	Thurles Hinterland [2]		Class 1				
	River Suir Central Plain / Nenagh Corridor [3,4]		Class 1				
	Templemore Plains [5]		Class 1				
	West Tipperary Farmland mosaic [6]		Class 1				
	Glen of Aherlow Farmland [20]			Class 2			
	Borrisokane Lowlands [7]			Class 2			
Peatlands & Wet Mixed Farmland	Littleton Raised Bog [8]				Class 3		
	Littleton Farmland Mosaic and Marginal Peatland [9]		Class 1				

Figure 2-8: A screenshot of Table 5.2 of the Landscape Character Assessment and Schedule of Views and Routes, which identifies the dominant sensitivity rating of Landscape Character Areas. (Source: Tipperary County Development Plan 2022 – 2028, annotated by Fehily Timoney and Company 2025)

As evidenced, the Littleton Bog area (where the Proposed Development is located) is identified as Class 3 and contains specific pockets of sensitivities throughout.

2.10.3.4.2 Site Specific Objectives and Guidelines

The Chapter defines specific objectives for each of the LCA's identified, the objective for Littleton Bog is aimed at enhancement and seeks to:

“Facilitate development that with capacity to continue and enhance established patterns of use and settlement without significant change to appearance or character”

It further details the compatibility between the identified LCA's and land uses; and also the principle landscape sensitivity factors. These are outlined in turn below.



Compatibility Key		Sensitivity Class	AGRICULTURE AND FORESTRY		HOUSING	URBANISATION		INFRASTRUCTURE	EXTRACTION		ENERGY	
			Agriculture	Forestry	Rural Housing	Urban Expansion	Industrial Projects	Tourism Projects	Major Powerlines	Sand /Gravel	Rock	Windfarm ²
Most												
High												
Medium												
Low												
Least												
Landscape Character Areas												
1.Urban and Fringe Areas	0											
2. Thurles Hinterland	1											
3. Nenagh Corridor	1											
4.River Suir Central Plain / Nenagh Corridor	1											
5. Templemore Plains	1											
6. West Tipperary Farmland mosaic	1											
7. Borrisokane Lowlands	2											
8. Littleton Raised Bog	3											
9. Littleton Farmland Mosaic and Marginal Peatland	1											
10. Upper Lough Derg	3											
11. The Shannon Callows	3											
12. River Shannon – Newport	4											
13. Arra Mountains – Lower Lough Derg	4											
14. Slieveardagh Hills Farmland mosaic	2											
15.Linguan Valley Marginal and Farmland Mosaic	2											
16. Slievenamuck Marginal Mosaic	3											
17. Upperchurch – Kilcomommon/ Hollyford Hills Mountain Mosaic	3											
18. Silvermines – Rearcross	3											
19. Slievenamon Mountain Mosaic	5											
20. Glen of Aherlow Uplands [20(B)]	5											
21. Galtee Mountain Mosaic	5											
22. Devils Bit Uplands	5											
23. Knockmealdown Mountain Mosaic	5											

Figure 2-9: A screenshot from the Landscape Character Assessment and Schedule of Views and Routes, illustrating the compatability of the idetified Landscape Character Areas with different types of development. (Source: Tipperary County Development Plan 2022 – 2028, annotated by Fehily Timoney and Company 2025.)



KEY		LANDUSE TYPES										
	5 – likely to be very compatible in most circumstances	AGRICULTURE AND FORESTRY	HOUSING	URBANISATION			INFRASTRUCTURE	EXTRACTION		ENERGY		
	4 – likely to be compatible with reasonable care											
	3 – likely to be compatible if sited and designed with great care											
	2 – compatible only in certain circumstances											
	1 – compatible only in exceptional circumstances											
	0 – very unlikely to be compatible											
Proximity within 300m of Principle Landscape Sensitivity Factors		Agriculture	Forestry	Rural Housing	Urban Expansion	Industrial Projects	Tourism Projects	Major Powerlines	& Sand Gravel	Rock	Windfarm	Solar Farm
Major Rivers and Water bodies		5	5	2	2	2	3	2	1	0	1	0
Ridgelines		5	5	1	1	1	1	1	0	0	2	0
Broad Leaved Forestry		3	5	2	2	2	4	3	2	3	1	2
Mixed Forestry		3	5		2	2	4	3	2	3	1	2
Natural Grasslands		5	2	2	1	1	4	2	1	1	2	2
Moors and Heathlands		2	2	1	0	0	1	2	1	0	2	1
Agricultural Land with Natural Vegetation		5	5	2	2	2	3	3	3	3	4	2
Peat Bogs		1	1	0	0	2	3	2	2	0	3	1
Scenic View		5	5	2	1	1	5	1	3	0	0	2
Scenic Route		5	5	2	1	1	5	1	3	0	0	2

Figure 2-10: A screenshot of Table 6.3 of the Landscape Character Assessment and Schedule of Views and Routes illustrating the principle landscape sensitivity factors compatibility with Principle Land Use Types. (Source: Tipperary County Development Plan 2022 – 2028, annotated by Fehily Timoney and Company 2025.

As outlined above, Wind Farms are the joint most compatible land use for Peat Bogs alongside Tourism Projects. This emphasises that despite Peat Bogs being largely incompatible with most forms of development, they have a strong capacity to accommodate Wind Energy Development and this is highlighted in Figures 2.9 and 2.10. More specifically, the Littleton Bog LCA is identified as having a medium compatibility with Wind Farm Development. This again, is one of the most compatible land uses identified for the Littleton Bog LCA, highlighting the suitability of the Site for the Proposed Development.

2.10.3.5 Applicants Response

The Proposed Development is located within the Littleton Bog LCA and as such also within Peat Bogs. In accordance with the policy contained in the *Tipperary County Development Plan 2022 – 2028*, Wind Energy Development is one of the most compatible forms of development for peat bogs and also the abovementioned LCA subject to appropriate design.



The Proposed Development, has been informed by extensive surveying and LVIA study effort along with employing a Design by Avoidance Mitigation Approach whereby areas of sensitivity identified are avoided entirely where possible. Therefore, we believe that the Proposed Development directly aligns with and supports the material outlined in the Landscape Character Assessment and Schedule of Views and Routes and that the Littleton Bog LCA is capable of supporting this.

2.10.3.6 Scenic Routes and Views of Tipperary

Appendix 2 of the Landscape Character Assessment and Schedule of Views and Routes outlines the Scenic Views and Routes within Tipperary County Council's administrative area. As evidenced in Figure 2.11 below, there are 2 scenic routes and viewpoints located immediately to the west of the site and 1 scenic route and viewpoint located immediately to the east of the site. There are also more scenic routes and viewpoints located further afield.

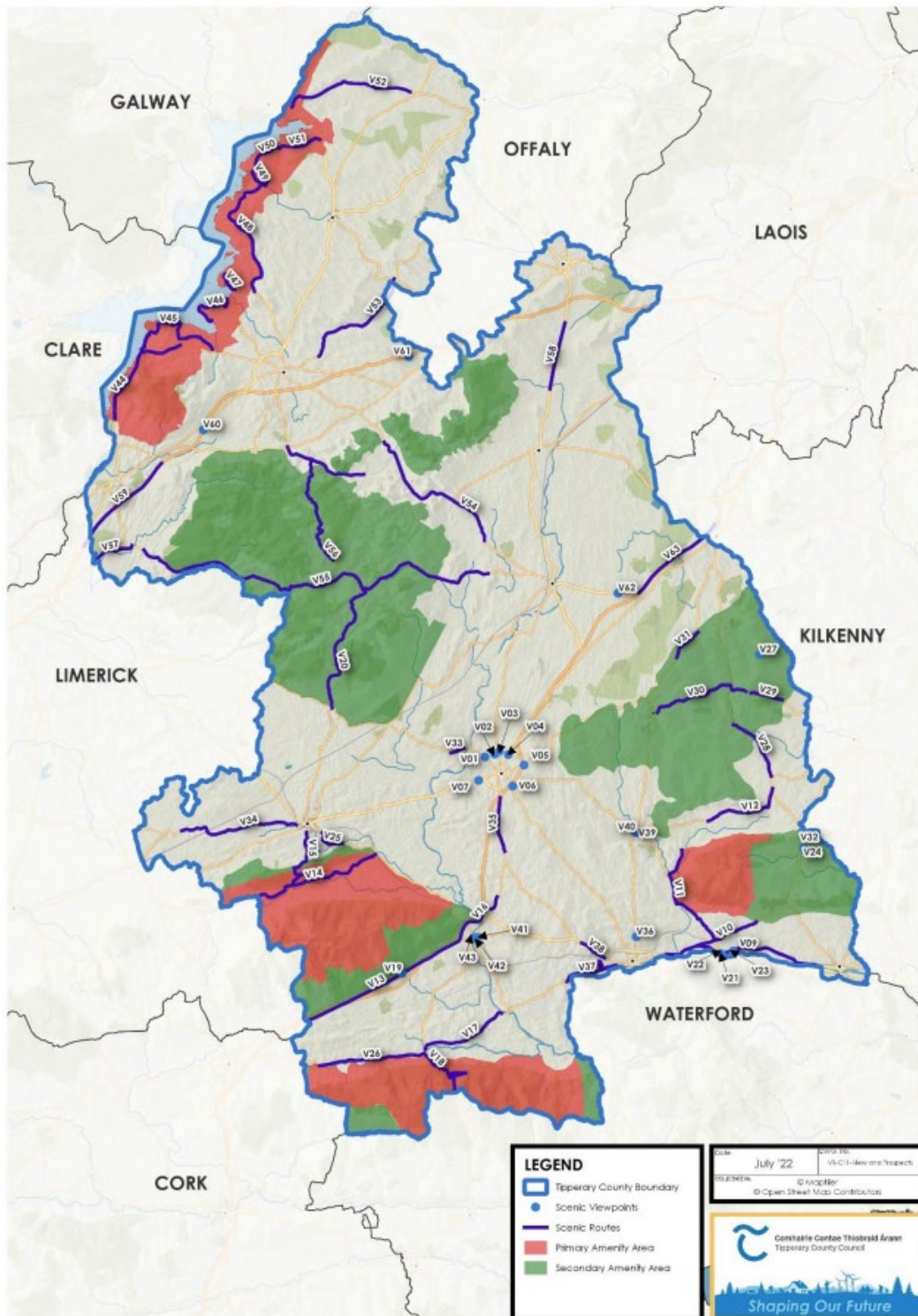


Figure 2-11: The Location of Scenic Routes and Views identified in the Landscape Character Assessment and Schedule of Views and Routes in Tipperary. (Source: Tipperary County Development Plan 2022 – 2028, annotated by Fehily Timoney and Company, 2025.)



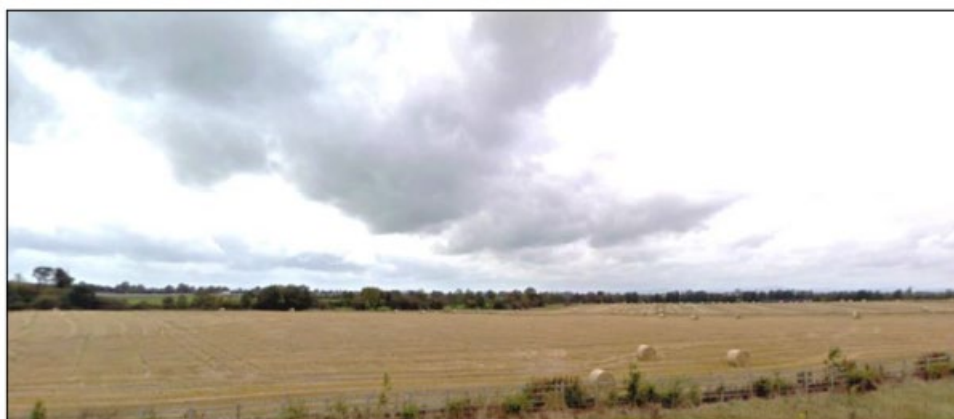
These viewpoints located in the immediate vicinity of the site are identified as V31, V62 and V63, the details of which are outlined in turn below:

- V31: This comprises views to the west between Glengoole and Ballysloe, along road R689
View 31: Views to the west between Glengoole and Ballysloe, along R689.



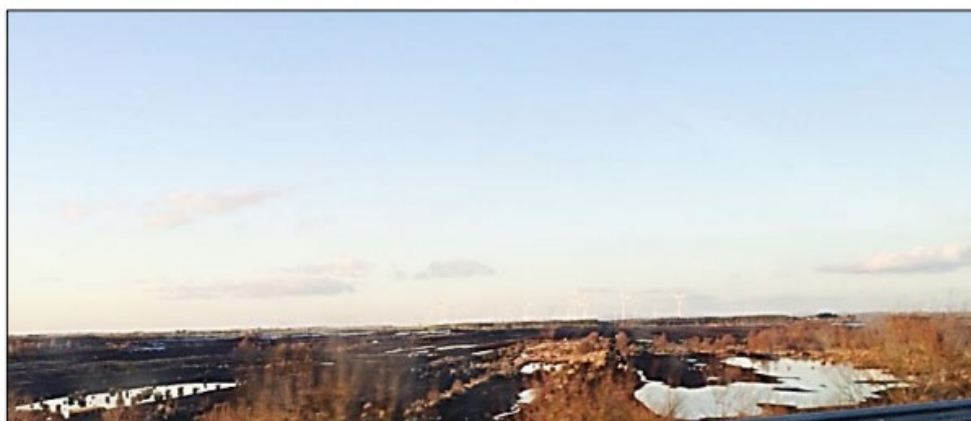
- V62: This comprises views from the N75 in Borris, east of Thurles

View 62: View from the N75 in Borris, east of Thurles



- V63: This comprises view from the M8 near Longford's Pass.

View 63: View from M8 Longford's Pass North





2.10.3.7 Applicants Response

The Proposed Development has been subject to extensive LVIA assessment, please refer to Chapter 13 of this EIAR. The conclusion of states that *'it is not considered that the Proposed Wind Farm will generate significant visual effects at receptors within either the central or wider study area.'*

Furthermore, a Wind Farm can be identified in the background of View 63 demonstrating the capability of this area to accommodate further Wind Energy related Development. As such, the Proposed Development will not have any significant effect on the abovementioned scenic routes or viewpoints.

2.10.4 Kilkenny County Development Plan 2021 – 2027

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

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

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

2.10.4.1 *Grid Related Planning Policy*

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

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

This section of the Chapter outlines a list of transmission related projects, which corresponds to the Eirgrid Strategy 2020 – 2025 which includes, *inter alia*, a new substation located next to the existing 38kV Ballyragget electricity substation, an upgrade to the existing Ballyragget-Kilkenny overhead line to a 110-kV standard and a new 110kV line between the Ballyragget and Proposed Coolnaback substation. All of these items will facilitate increased capacity at the Ballyragget substation. Furthermore, it is also acknowledged that new projects may also arise to facilitate electricity demand growth and the connection of new electricity generation projects – which subtly hints towards the delivery of further renewable energy developments.



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

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

2.10.4.2 Biodiversity Policy

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

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



2.10.4.3 Applicants Response to the Kilkenny City and County Development Plan 2021 – 2027 Policies and Objectives

The Proposed Grid connection has been thoroughly assessed throughout this Environmental Impact Assessment Report which includes the assessment of impacts on population and human health, cultural heritage, biodiversity/ecology, landscape and visual impact, and hydrology. As detailed in each of these respective chapters, the Proposed Grid Connection will not result in any likely significant effects subject to the implementation of the Mitigation Measures. From the outset, the Applicant has adopted a mitigation by avoidance approach whereby lands that, through the extensive surveying, have been identified as sensitive have been avoided entirely where possible.

Whilst the Proposed Grid Connection Route will cross an Special Area of Conservation (SAC) to gain access to the existing grid infrastructure in Kilkenny, a suite of appropriate mitigation measure ensure that there will be no impact on same. This includes employing HDD drilling. Additionally, the grid connection is to be located entirely underground and for the most part within the public road, which will avoid any serious impact on high sensitivity landscapes.

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

2.11 Other Relevant Policies and Guidelines

2.11.1 Department of Environment, Heritage and Local Government – Wind Energy Development Planning Guidelines (WEDGs) 2006

The *Wind Energy Development Planning Guidelines* (2006) published by the *Department of the Environment, Heritage and Local Government* (DoEHLG) offer advice to planning authorities assessing planning applications for wind farm developments. The 2006 guidelines set out criteria which assist in the identification of suitable locations for wind energy development, which include assessments of the following:

- Noise Control: Guidelines to ensure that noise levels from wind turbines are within acceptable limits to minimize disturbance to nearby residents;
- Visual Amenity: Considerations for the visual impact of wind turbines on the landscape, including setback distances from residences and scenic areas;
- Shadow Flicker: Measures to mitigate the effects of shadow flicker caused by rotating turbine blades;
- Community Consultation: Requirements for engaging with local communities during the planning and development stages;
- Environmental Impact: Assessment of potential impacts on wildlife, habitats, and natural resources;
- Grid Connection: Guidelines for connecting wind energy projects to the national grid;
- Safety: Standards for the safe construction, operation, and maintenance of wind turbines.



2.11.1.1 Applicants Response:

The Proposed Development is underscored by the provisions of the *Wind Energy Development Guidelines 2006* in both the design and siting of the infrastructure, as reflected in the relevant chapters of this EIAR. With regard to the Proposed Development and site selection and design consideration, aspects such as visual intrusion by choosing locations that integrate well with the surrounding landscape, and implementing setback distances eliminate shadow flicker and noise impact on nearby residences have been implemented throughout all chapters of this EIAR. Furthermore, thorough environmental and ecological impact assessments have been conducted to ensure biodiversity protection with regards to local wildlife, watercourses and ornithology, with measures implemented to prevent soil erosion and preserve watercourses.

2.11.2 Draft Revised Wind Energy Development Guidelines (WEDGs, December 2019)

Published by the Department of Housing, Planning and Local Government in December 2019, the Draft Wind Energy Guidelines were published for public consultation for 10 weeks until 19th February 2020. However, the 'Wind Energy Guidelines 2006' remain valid, and are still the relevant guidelines for the purposes of Section 28 of the Planning and Development Act 2000 (as amended) until the Department of Housing, Planning and Local Government publish revised guidance on criteria such as set-backs and visual impact. The Proposed Development has adhered to this criteria such as implementing a setback distance of four times the tip height between the turbines and the nearest point of any residential/commercial property, with a minimum mandatory setback distance of 500 metres where turbine tip height is not applicable. While the Climate Action Plan 2024 (CAP24) sets out a timeline of Q4 2024 for publication of the final updated Wind Energy Guidelines, the final version has not been issued/ published yet.

2.11.2.1 Applicants Response:

The Climate Action Plan 2024 (CAP24) sets out a timeline of Q4 2024 for publication of the final updated Wind Energy Guidelines. The 2006 WEDGs remain in valid, however, the Proposed Development complies with stated set back and visual impact setback requirements as outlined within the *Draft Wind Energy Guidelines 2019*. If new Guidelines are published during the planning process for this Proposed Development, the developer respectfully requests the opportunity to demonstrate compliance with any new Guidance that may be adopted.

2.11.3 Irish Wind Energy Association (2012) – Best Practice Guidelines for the Irish Wind Energy Industry

The '*Best Practice Guidelines for the Irish Wind Energy Industry*' were published by the Irish Wind Energy Association (IWEA) in 2008 and these Guidelines were updated in 2012. These guidelines promote responsible and sensitive wind farm development, and to aid and recommendations for those developing onshore wind energy projects in Ireland.

2.11.3.1 Applicants Response:

The approach to the Proposed Development is aligned with the 2012 IWEA guidelines which reflect relevant planning and environmental legislation, requirements for environmental impact assessment. Also, the proposed development provides an environmentally sensitive design, takes account of best practice health and safety and provides opportunities for public engagement in order to develop a responsible and sensitive wind energy project.



2.11.4 IWEA Best Practice Principles in Community Engagement and Community Commitment 2013

The Best Practice Principles in Community Engagement and Community Commitment were published by IWEA in 2013. IWEA and its members support the provision of financial contributions by wind farm operators to local communities and have sought to formulate best practice principles for the provision of a community commitment. The document sets out IWEA's best practice principles for delivering extended benefits to local communities for wind farm developments of 5MW or above.

Best Practice Principles of community engagement when planning the engagement strategy and preparing associated literature are also outlined in the document. The aim of the publication is to ensure that the view of local communities is taken on board at all stages of development and that local communities share in the benefits of the development.

2.11.4.1 *Applicants Response:*

Throughout the consultation process for the Proposed Development, specific regard has been taken of this guidance document with community and statutory body consultations in complying with the best practice principles for community engagement and community commitment such as communications regarding the financial contributions such as the Community Benefit Fund. Details of the consultation process conducted throughout the design and development stages of the Proposed Development are detailed in this Chapter.

2.11.5 Code of Practice for Wind Energy Development in Ireland (2016) – Guidelines for Community Engagement

In December 2016, the Department of Communications, Climate Action and Environment (DCCAE) issued a code of practice for wind energy development in relation to community engagement.

This Code of Good Practice:

"is intended to ensure that wind energy development in Ireland is undertaken in observance with the best industry practices, and with the full engagement of communities around the country."

2.11.5.1 *Applicants Response:*

The guidance states that the methods of engagement should reflect the nature of the Proposed Development and the potential level of impact that it could have on a community. Throughout the consultation process the applicant has adhered to the *Code of Practice for Wind Energy* while consulting with the community and statutory bodies, with details of the consultation process conducted throughout the design and development stages of the Proposed Development summarised in this Chapter.

2.11.6 Renewable Electricity Support Scheme5 (RESS 55)

The Renewable Electricity Support Scheme (RESS) is a critical component of Ireland's strategy to transition to a sustainable, low-carbon energy system. This latest iteration of the RESS applicable to the Proposed Development will be RESS 5, with the *RESS 5 Auction Information Pack* published on 29th August 2025. RESS 5 is a scheme which continues to build on the successes and lessons learned from the previous rounds, aiming to further enhance Ireland's renewable energy capacity and meet its climate targets.



RESS operates through competitive auctions which determine which projects receive support, ensuring that cost-effective and efficient projects are prioritised. RESS 5 is aligned with the Climate Action Plan 2025, the EU Renewable Energy Directive (RED III), and Ireland's National Energy and Climate Plan, all of which set a clear pathway to achieving 80% renewable electricity by 2030.

Eligible technologies under RESS 5 include onshore wind, offshore wind, solar PV, hydro, and other renewable sources. The scheme's policy objectives remain focused on:

- Cost Effectiveness – delivering renewable electricity at the lowest cost to consumers.
- Energy Security – reducing reliance on imported fossil fuels by diversifying indigenous generation.
- Technology Diversity – broadening the mix of renewables, including onshore wind, offshore wind, and solar.
- Community Participation – ensuring communities benefit through ownership models and community benefit funds.
- Sustainability – supporting decarbonisation by reducing greenhouse gas emissions.
- Economic Growth – creating jobs and driving investment in the green economy.
- Consumer Protection – insulating consumers from fossil fuel price volatility through stable, long-term renewable supply.

2.11.6.1 Applicants Response:

If planning permission is granted, the Proposed Development will apply for the RESS 5 supports as outlined within the *Rulebook for Community Benefit Funds under RESS (2025)*, with the Proposed Development contributing approximately 68.2MW of onshore wind capacity. The Proposed Development will facilitate the establishment of a *Community Benefit Fund (CBF)* in compliance with the *Rulebook for Community Benefit Funds under RESS*, ensuring households and local communities receive direct, transparent, and lasting benefits. In doing so, the Proposed Development supports RESS objectives of cost effectiveness, energy security, community participation, and long-term sustainability.



2.12 Conclusion

The policies, objectives and legislation as described throughout this chapter have set out all significant International, European, National, Regional and Local policy support for a move to renewable energy technologies and a reduction in greenhouse gas emissions. Ireland is committed to meeting International and European targets, and if these targets are not met, the government must purchase Carbon Credits to meet compliance with both emissions and renewable energy targets or face fines from the EU.

The SEAI report, Energy in Ireland (2023) set out the nation's latest progress towards renewable energy targets, 2022 saw renewable energy production accounts for approximately 13.1% of the nation's overall energy production. The National Renewable Energy Action Plan (NREAP) has set a target of 16% by the year 2020. It is evident that we still have not achieved this target, now that some time has passed.

While Ireland has come a long way in increasing renewable energy generation, the targets are ever increasing from a European perspective. The 2050 European targets effectively mean that Europe's energy production will have to be almost carbon-free by 2050.

Now that the Revised NPF has been adopted (as of 30th April 2025), the Regional Capacity Allocations will need to be met up to 2040, with this proposal contributing 68.2 MW which is circa 6.9% of the remaining 978 MW of additional power to be allocated within the Southern Region over the next 15 years.

CAP24 sets out an objective to more than double Ireland's onshore wind energy capacity to 9 GW by 2030, in order to meet new renewable energy targets and reduce emissions. This remains the target under CAP25. There is a clear national mandate to accommodate significant onshore wind within the next decade. Furthermore, the Revised National Planning Framework, places greater emphasis on a move to a low-carbon economy to reduce Ireland's carbon footprint by integrating climate action into the planning system in support of national targets.

It is this commitment on energy and climate policy that justifies a clear need for renewable energy generation in Ireland. It is recognised that there are a range of renewable resources alternatives that could be explored to meet our International and European commitments, however onshore wind is recognised as being a key to achieving this as emphasised in the Climate Action Plan 2025 (CAP35). It is also a proven technology that will be critical to meeting the near-term renewable targets up to 2030.

In consideration of the reasons and analysis as set out in this chapter of the EIAR, it is our professional opinion that the Proposed Development adheres to all relevant planning policies, and therefore, is favourable from a national and local policy perspective, particularly in relation to the National Planning Framework (NPF), The Climate Action Plan 2024 & 2025 (CAP24 & CAP25), and The Climate Action and Low Carbon Development (Amendment) Act 2021 (the "Climate Act"). The Proposed Development will contribute significantly to the ambitious targets set out in the policies as described within this chapter and enhance and expand upon the existing mix of renewables in Ireland's electricity network and national grid.



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