

An
Coimisiún
Pleanála

Inspector's Report ABP-318372-23

Development	Proposed 77MW Wind Farm of up to 11 No. Turbines, Grid Connection, Turbine Delivery Route and 110kV Electricity Substation with Battery Energy Storage.
Location	Doolough (Dumha Locha) and Muingmore (An Mhoing Mhór), Co. Mayo
Prospective Applicant	RWE Renewables Ireland Limited
Type of Application	Pre-Application Consultation under Section 37B of the Planning and Development Act, 2000
Date of site inspection:	26 th November 2023
Inspector	Alaine Clarke

1.0 Introduction

- 1.1. The Commission received a request dated 2nd November 2023 to enter into pre-application consultations under Section 37B of the Planning and Development Act, 2000, as amended, in relation to a proposed windfarm, known as Muingmore Windfarm, 110kV substation and battery storage development in Doolough and Muingmore, Co. Mayo.
- 1.2. The proposed applicant sought closure of the pre-application consultation by correspondence dated 25th September 2025.

2.0 Site Location

- 2.1. The prospective site is located in the coastal area of western Co. Mayo in the townlands of Doolough (Dumha Locha) and Muingmore (An Mhoing Mhór) measuring approximately 3km northeast to southwest and ca. 0.5km from the village of Gweesalia and ca. 7.5km from Bangor Erris. The prospective site is ca. 240m from the coast at its closest point and it is located within a Gaeltacht area.
- 2.2. The lands largely comprise of commercial forestry and bog areas in a generally open and flat landscape, though slightly undulating towards the eastern-most point of the site and falling from north to south.
- 2.3. The prospective site is bisected by a local category road. The south portion of lands is bound in part by a local category road, elsewhere the site is generally bound by bog.
- 2.4. The nearest site is ca. 200m to the Mullet/Blacksod Bay Complex SAC and the Blacksod Bay/Broad Haven SPA. A number of water bodies transect the site which are connected downstream to the aforementioned Natura 2000 sites.
- 2.5. There is one recorded monument within the site boundary, a crannog. There are other monuments in the vicinity including two crannogs which are proximate to the site boundary.

3.0 Description of Proposal

3.1. As Originally Submitted

RWE Renewables (Ireland) Ltd. requested pre-application consultations under Section 37B of the Planning and Development Act, 2000, as amended, for the proposed development of:

- 11 no. wind turbines with a capacity of c. 77MW, each with an overall blade tip height of up to 180m, rotor diameter of up to 155m, hub height of between 102.5m and 105m,
- 110 kV electricity substation and switch rooms,
- battery energy storage and associated works including storage and parking,
- equipment compound
- turbine foundations
- temporary construction compounds
- crane pad hardstand areas
- 33kV collector between the proposed on-site substation to an overhead 110kV electricity line
- Site access tracks
- Underground electricity and communications cabling
- Site drainage works and sediment control
- Site entrances
- Works along the public roadways to a Turbine Delivery Route (TDR) to facilitate turbine and tower delivery.
- Works along public roadways to facilitate Grid Connection to Bellacorrick substation, and
- Permanent meteorological mast.

3.2. Proposed Scheme at Time of Closure

As refined during the course of the pre-application consultation (refer to Presentation dated 9th April 2025 and request to close consultation, dated 25th September 2025), the proposed development will include the following elements:

- Construction of 13 no. wind turbines; each with an overall blade tip height of between 179-180m, rotor diameter between 149-163m, and hub height of between 98.5-105.5m within 2 no. clusters. Each turbine has the potential to generate 5-7MW of power, leading to a total output in the range of 65–91MW.
- Construction of an on-site 110kV electrical substation
- Construction of Battery Energy Storage facility
- Works to public roadways along the Turbine Delivery Route.

3.3. The applicant has advised, per correspondence dated 25th September 2025, that the planning application will exclude the originally proposed grid connection.

4.0 Planning History

4.1. No relevant planning history.

5.0 Precedent Decisions

5.1. The following table outlines a sample of other SID pre-application determinations for wind farm developments of similar scales decided by the Commission:

ABP Ref.	Location	Development Description	ABP Decision
316466	Galway	9 turbines. Output of 54MW and 64.8MW	Is SID
321507	Galway	11 turbines. Output of 66MW and 73MW	Is SID
320745	Limerick	17 turbines. Output of 75MW and 95MW	Is SID

320703	Mayo	19 turbines. Output of 70.05MW	Is SID
319601	Waterford	15 turbines. Output of 85.5MW to 108MW	Is SID

6.0 Prospective applicant's case

6.1. The prospective applicant's case can be summarised as follows:

- The prospective applicant believes that the proposed development is strategic development as defined under the 7th Schedule of the Planning and Development Act, 2000, as amended, given that the project comprises a windfarm which would have an output greater than 50 MW.
- The prospective applicant considers that the proposed windfarm development satisfies the three criteria set out in section 37A(2) of the Act and therefore is strategic infrastructure development, i.e. that the proposed development is of strategic economic or social importance to the State or the region in which it would be situated, that it would contribute substantially to the fulfilment of any of the objectives of the National Planning Framework or in any regional spatial and economic strategy in force in respect of the area or areas in which the development would be situated and it would have a significant effect on the area of more than one planning authority.
- With respect to strategic economic or social importance, the following points are made:
 - The proposed development has the potential to power 62,634 homes, enough to power 92% of the current housing stock of Co. Mayo, with renewable energy.
 - The proposed development has the potential to create 250 direct jobs during the construction phase and between 24 and 31 long-term jobs during the operational and maintenance phase of the proposed development.
 - CO2 emissions savings will continue to rise with the installation of this renewable energy development.

- The proposed development has strategic economic and social importance to achieving both European and National renewable energy and decarbonisation objectives.
- Referencing the REPowerEU plan, the European Green Deal, the RED III Directive, which focuses on accelerating and increasing the rollout and use of renewables, the proposed development would contribute to EU wide renewable energy targets of 42.5% by 2030.
- With respect to the fulfilment of National Planning Framework or Regional Spatial and Economic Strategy objectives, the following points are made:
 - Referencing National Planning Objectives 21, 54 and 55 which seeks to enhances competitiveness of rural areas into new sectors including climate change, reducing our carbon footprint by integrating climate action into the planning system and promoting renewable energy use and generation at appropriate locations.
 - The proposed development is in keeping with objective RPO 4.17 in the Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region relating to positioning the region to avail of the emerging global market in renewable energy.

7.0 Pre-Application Consultations

- 7.1. Two pre-application consultation meetings were held between An Coimisiún Pleanála and the prospective applicant. Full details of the meetings and matters discussed are contained in the Commission's records for the meetings.
- 7.2. The first meeting took place on 25th January 2024. The principal matters arising related to:
- Key elements of the proposal, in particular the battery storage element.
 - The prospective's applicant's intention to enter consultations regarding a design flexibility opinion.
 - The economic importance of the proposal.
 - The receiving environment.

- Landscape and Visual Impact Assessment.
- Noise Impact
- Natural heritage considerations.
- Water and hydrological considerations.
- Land, soil and geology considerations.
- Cultural heritage considerations.
- Traffic considerations.
- Turbine delivery route.
- Grid connection route.
- The proposal as a Strategic Infrastructure Development.
- Public consultations undertaken to date.

7.3. The second meeting took place on 9th April 2024. The principal matters arising related to:

- Project update, including turbine delivery route, grid connection route, survey work across environmental factors and scoping consultation.
- Legislative and policy considerations.
- The Battery Energy Storage System.
- Location of the site within a Gaeltacht area, and procedural requirements.
- Potential effects on tourism to be considered in the EIAR.
- Natural heritage impacts.
- Geological impacts including peat slippage and
- Cultural heritage impacts.

7.4. With respect to pre-application consultations, the prospective applicant has engaged with Mayo County Council and have consulted with NPWS, and with the Transmission System Operator - Eirgrid. At the time of the 1st pre-application meeting the applicant advised that bird and bat surveys were going and that their ecology team were yet to raise any significant issue. At the 2nd pre-application

meeting, the applicant advised there will be 3-4 years of bird surveys when the surveys are completed. Scoping documents were issued to 69 no. statutory and non-statutory bodies as part of the pre-application consultation process.

Post-meeting

- 7.5. An application under section 37CC of the Planning and Development Act 2000, as amended, was made by the prospective applicant in respect of design flexibility relating to the subject proposed development, An Bord Pleanála ref. 321948-25 refers. A meeting was facilitated on 9th April 2025. The Inspector's Report on 321948-25 is complete and is presented concurrently with this pre-application file for the Commission's consideration.
- 7.6. As detailed above, the applicant has advised, per correspondence dated 25th September 2025, that the planning application will exclude the originally proposed grid connection.

RED III Directive

- 7.7. No meeting has been held since the transposition of RED III Directive and the Commission will note that this report does not address the provisions of the Directive as transposed by SI 274 of 2025. In this regard there has been no discussion in respect of the completeness check to be undertaken when a future application is lodged and this recommendation does not provide a Schedule of Information to inform the completeness check.

8.0 Legislative Provisions

8.1. Planning and Development Act 2000, as amended

- 8.1.1. Section 2(1) of the Planning and Development Act 2000, as amended ('the Act'), defines 'strategic infrastructure' as including, inter alia

'(a) any proposed development in respect of which a notice has been served under section 37B(4)(a)',

- 8.1.2. Section 37A of the Act states that:

(1) An application for permission for any development specified in the Seventh Schedule (inserted by the Planning and Development (Strategic

Infrastructure) Act 2006) shall, if the following condition is satisfied, be made to the Commission under section 37E and not to a planning authority.

(2) That condition is that, following consultations under section 37B, the Commission serves on the prospective applicant a notice in writing under that section stating that, in the opinion of the Commission, the proposed development would, if carried out, fall within one or more of the following paragraphs, namely—

(a) the development would be of strategic economic or social importance to the State or the region in which it would be situate;

(b) the development would contribute substantially to the fulfilment of any of the objectives in the National Planning Framework or in any regional spatial and economic strategy in force in respect of the area or areas in which it would be situate;

(c) the development would have significant effect on the area of more than one planning authority.

8.1.3. Class 1 of the Seventh Schedule relates to energy infrastructure and includes the following category of development:

‘an installation for the harnessing of wind power for energy production (a wind farm) with more than 25 turbines or having a total output greater than 50 megawatts’.

8.2. Environmental Impact Assessment

8.2.1. Section 37E(1) of the Planning and Development Act, 2000, as amended requires that an application for permission for development in respect of which a notice has been served under section 37B(4)(a) shall be made to the Commission and shall be accompanied by an environmental impact assessment report (EIAR) in respect of the proposed development. Therefore, the submission of an EIAR is mandatory.

8.3. **Appropriate Assessment**

- 8.3.1. The nearest site is ca. 200m to the Mullet/Blacksod Bay Complex SAC and the Blacksod Bay/Broad Haven SPA. The prospective applicant has indicated that it is their intention to include a Natura Impact Statement with the application.

9.0 **Assessment**

9.1. **Section 37A (1) – Is the development specified in the Seventh Schedule of the Act?**

- 9.1.1. Based on the information contained in the prospective applicant's cover letter and elaborated upon at the pre-application consultation meeting, and close-out request, the proposed development would provide 13 no. turbines with a total output of between 65 MW - 91 MW, depending on the turbine chosen. Based on the proposed output, the proposed development would exceed the 50MW threshold for wind farms set out in Class 1 (Energy Infrastructure) of the Seventh Schedule of the Act. Therefore, the proposed development satisfies Section 37A (1) of the Act.

9.2. **Section 37A (2) - Does the proposed development specified in the Seventh Schedule fall within one or more of the paragraphs referred to as (a), (b) and (c) and outlined below?**

9.3. **(a) – Strategic Economic or Social Importance to the State or Region**

- 9.3.1. The proposed development will contribute to the transition to a low carbon, climate resilient and environmentally sustainable economy in line with national policies and objectives such as the Climate Action and Low Carbon Development Act 2015 (as amended), Climate Action Plan 2024 (CAP 24), Climate Action Plan 2025 (CAP 25), and Project Ireland 2040: The National Planning Framework - First Revision, April 2025 specifically National Policy Objective 70 which seeks to promote renewable energy use and generation at appropriate locations. I further consider the proposed development would involve significant capital investment in the region and will create employment opportunities relating to the construction, operation, and decommissioning of the development. Additionally, rates will be made payable to Mayo County Council by the developer and a Community Benefit Scheme will be put in place to the benefit of the local community. All of these considerations will result in

a positive impact on the economic profile of the subject area and investment in the region.

9.3.2. Having regard to the national policy context and the details of the subject proposals outlined above, I am satisfied that the development would clearly be of strategic economic importance to the State and the region and would therefore comply with the condition set out in Section 37A(2)(a) of the Act.

9.4. **(b) - Fulfilment of Objectives in the National Planning Framework or in any regional spatial and economic strategy**

9.5. It is submitted by the prospective applicant that the proposed development would contribute to the objectives of the National Planning Framework (NPF) and the provisions of the Climate Action Plan (CAP) 24, CAP 25, and The Northern and Western Regional Spatial and Economic Strategy 2020-2032 (RSES).

9.6. Having reviewed the NPF - First Revision, I note the following relevant National Strategic Outcome 8 (NSO 8) to transition to a carbon neutral and climate resilient society and National Policy Objectives (NPOs) 69, 70 and 74 which seek to encourage, facilitate and harness renewable energy sources including wind at appropriate locations within the built and natural environment to meet national objectives towards greenhouse gas emissions reductions and achieving a low carbon economy by 2050.

9.7. At a regional level, the Spatial and Economic Strategy for the Northern and Western Region 2020-2032 supports an increase in the amount of new renewable energy sources in the region, stating that the renewable energy needs of the region, in the form of wind, solar and biomass, will be likely to be met in rural areas.

9.8. The proposal to generate over 50MW of renewable energy by using wind as a resource would assist in reducing greenhouse gas emissions and would contribute significantly towards the achievement of a low carbon economy.

9.9. Having regard to the above, I am satisfied that the development would meet relevant national policy objectives of the NPF First Revision and would serve to fulfil the relevant regional policy objectives of the RSES for the Northern and Western Regional Assembly. The development would, therefore, satisfy the requirement set out in section 37A(2)(b) of the Act.

9.10. (c) - Significant effect on the area of more than one planning authority.

- 9.10.1. The prospective windfarm site is fully contained within the area of one planning authority, Mayo County Council, while the turbine delivery route will traverse Counties Donegal, Sligo and Mayo via regional, national primary, national secondary and local roads.
- 9.10.2. I consider that the Commission could reasonably come to the conclusion that the development would have an effect on an area of more than one planning authority. Accordingly, I am also of the opinion that the proposed development would also fall within the scope of section 37A(2)(c).

10.0 Prescribed Bodies

- 10.1. In view of the scale, nature and location of the proposed development, as described in this report, it is recommended that the prospective applicant should consult with the prescribed bodies listed in the attached Appendix A in respect of any future application for approval.
- 10.1.1. The proposed applicant is advised that as the site is located within a Gaeltacht area the Minister for Community Rural and Gaeltacht Affairs and Údarás na Gaeltachta should be consulted. The prospective applicant has been advised to contact An Coimisiún Pleanála with respect to procedures for making applications in Gaeltacht areas particularly in respect of the public notice and documentation to be provided in Irish.
- 10.1.2. The application should be supported by Fire Risk and Safety Assessment, and Emergency Response Plan and a Battery Management System.
- 10.1.3. The prospective applicant is further advised to submit a standalone document (which may form part of the EIAR) with the planning application, which outlines the mitigation measures, in the interest of convenience and ease of reference.
- 10.1.4. As stated, no meeting has been held since the transposition of RED III Directive and the Commission will note that the report does not consider the completeness check required and a Schedule of Information to facilitate same is not provided.

11.0 Recommendation

- 11.1. Based on the foregoing assessment, it can be concluded that the proposed development would exceed the threshold set out in the Seventh Schedule of the Planning and Development Act 2000, as amended, and therefore satisfies Section 37A(1) of the Act. It can also be concluded that the development is of strategic importance by reference to the requirements of Sections 37A(2)(a), 37A(2)(b) and 37A(2)(c) of the Act.
- 11.2. I recommend that the Commission serve a notice on the prospective applicant, pursuant to Section 37B(4) of the Planning and Development Act 2000, as amended, stating that it is of the opinion that the proposed development which comprises the following, submitted by the prospective applicant:
- 13 no. wind turbines with an estimated generating capacity of between 65-91MW;
 - 110 kV substation;
 - Battery Energy Storage System; and,
 - Turbine Delivery Route

would constitute a strategic infrastructure development within the meaning of Section 37A of the Act for the reasons and considerations set out below.

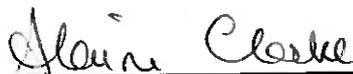
12.0 Reasons and Considerations

- 12.1. Having regard to the size, scale and location of the proposed windfarm and related development, and to the policy context, it is considered that the proposed development of 13 no. wind turbines with an estimated generating capacity of between 65-91MW, a 110 kV substation, a Battery Energy Storage System, and a Turbine Delivery Route on a site at Doolough and Muingmore, Co. Mayo constitutes development that falls within the definition of energy infrastructure in the Seventh Schedule of the Planning and Development Act 2000, as amended, thereby satisfying the requirements set out in Section 37A(1) of the Act.

- 12.2. The proposed development is also considered to be of strategic importance by reference to the requirements of Sections 37A(2)(a), 37A(2)(b) and 37A(2)(c) of the Planning and Development Act 2000, as amended.
- 12.3. An application for permission for the proposed development must therefore be made directly to An Bord Pleanála under Section 37E of the Planning and Development Act 2000, as amended.

PROFESSIONAL DECLARATION

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.



Alaine Clarke

Senior Planning Inspector

11th November 2025

Appendix 1 – Prescribed Bodies considered relevant for the purposes of Section 37E (3) (c) of the Principal Act.

- Department of Housing, Local Government and Heritage
- Department of Climate, Energy and the Environment
- Department of Enterprise, Tourism and Employment
- Department for Rural and Community Development and the Gaeltacht
- Department of Agriculture, Food & Marine
- Department of Transport
- Údarás na Gaeltachta
- Mayo County Council
- Sligo County Council
- Donegal County Council
- The Northern and Western Regional Assembly
- Transport Infrastructure Ireland
- National Transport Authority
- An Chomhairle Ealaíon (Arts Council)
- The Heritage Council
- Fáilte Ireland
- An Taisce
- Uisce Éireann
- Inland Fisheries Ireland
- Irish Aviation Authority
- CIE
- Iarnród Éireann
- EPA
- HSE
- Health and Safety Authority
- The Commission for Regulation of Utilities
- Office of Public Works
- ESB

- EirGrid

Further notifications should also be made where deemed appropriate.