

4 PLANNING AND POLICY

4.1 INTRODUCTION

This Chapter sets out the planning policy context relevant to the Project by providing an overview of the international, national and regional legislation and policy of relevance, as well as a detailed review of the planning policy framework within which the application will be assessed. This section also provides a brief overview of the most up-to-date statistics on Irish renewable energy production, climate emissions, and the benefits the Project can bring to helping Ireland meet 2030 and 2050 targets.

The planning policy assessment demonstrates that the Project is consistent with European, National and Local Plan Policies. In particular, the Project will help to meet the objectives of the Climate Action Plan 2025 and the Climate Action Low Carbon Development Act 2015 as amended (the “Climate Act”). The Garane Green Energy Project is anticipated to make a significantly contribution to Ireland’s renewable energy targets. The Project will have a generating capacity of 54MW and will be of economic and social importance to both the region and the state.

The urgent need to fight climate change and society’s rising demand for energy is prevalent across the policies reviewed. Renewable energy is identified throughout this review as being required to play a vital role in mitigating climate change by transitioning to a climate neutral economy and society. By investing in renewable energy, Ireland can promote sustainable economic development using its own, secure and clean energy.

The Project will aid climate change adaptation and greenhouse gas reduction efforts on both international and European scales.

Ireland faces challenges meeting renewable energy and emissions targets, with high rates of imported fossil fuel dependency and increasing energy demand. Rising energy prices and potential political instability add to fossil fuel price volatility. The Project aims to address these challenges by providing reliable, secure, and affordable energy supplies, potentially reducing reliance on imported fuels.

In summary the Project would:

- Contribute to the 65% overall renewable energy target for the EU introduced by the REPowerEU Plan in light of the war in Ukraine.

- Contribute to assisting Ireland to increase from 42% electricity produced by renewable sources in 2020 to 80% by 2030 to meet the national target.
- Contribute towards the National Development Plan 2021-2030's National Strategic Outcome number 13 to diversify away from fossil fuels to green energy which includes wind.
- Contributes towards climate change mitigation as specified in the National Planning Framework's National Policy Objective 69.
- Contribute toward renewable energy use and generation as specified in the National Planning Framework's National Policy Objective 70.
- Contribute 54MW, 1.15% of the current shortfall, of renewable wind energy to the national CAP2024 target of 9GW by 2030 helping to reduce the current 4.7GW shortfall.
- Comply with the Regional Spatial and Economic Strategy for the Southern region's goal of producing renewable energy to tackle climate change, meet predicted growth in demand and provide energy security.
- Support the local Limerick LDP 2022 - 2028 policy on promoting appropriate renewable energy development and assist the county in achieving its goal of being the national leader in renewable energy generation to facilitate a low carbon future.
- Contribute 54MW of renewable wind energy to the LDP 2022 – 2028 of 386.45MW by 2030, helping to reduce the current 152.1MW shortfall.
- Contribute to rural economic development in line with the Limerick County Development Plans and of the RSES.

4.2 STATEMENT OF AUTHORITY

This chapter has been prepared by Jennings O'Donovan & Partners Limited, in particular Siobhan Roddy, Breena Coyle, and David Kiely.

Siobhan Roddy is a graduate Environmental Scientist with a BSc in Environmental Science and Technology from Dublin City University. Siobhan supports the environmental team in JOD by contributing to EIAR chapters, feasibility studies and GIS services.

Breena Coyle, Senior Town Planner in Jennings O'Donovan & Partners Limited (JOD), has a Masters in Environment Planning from Queens University and has over 13 years' experience in Environmental Planning throughout Ireland and the UK. She has a clear understanding of the legislative framework and has experience in the development of wind farms from the pre-planning process through to construction.

David Kiely has a Bachelor of Engineering Degree in Civil Engineering and a Master's of Science degree in Environmental Protection, in addition to 40 years' experience in the civil engineering/ environmental sector. David has led/managed EISs/EIARs and overseen the development of over 50 wind farms in Ireland. This includes whole life cycle from feasibility, planning and environmental assessment through to construction, including the preparation of alternative consideration chapters for other wind farms. David Kiely has undertaken EISs/ EIARs for wind farms throughout Ireland.

4.3 IRISH PLANNING LEGISLATION AND POLICY CONTEXT

Table 4.1: Irish Planning Legislation and Policy Context

Legislation / Policy	Context
Planning and Development Acts 2000 (as amended)	The Planning and Development Act sets out the statutory basis for the carrying out of an Environmental Impact Assessment (EIA).
Planning and Development Regulations 2001 (as amended)	The Planning and Development Regulations prescribe the requirements of the EIA process.
Habitats and Birds Directives	The Habitats Directive 92/43/EEC and the Birds Directive 2009/147/EC set out the requirements for the protection of habitats and species and in the case of the latter, bird species, of European and national importance. For the purposes of planning, these directives have been transposed into Irish legislation under the Planning and Development Act (in particular Part XAB), the Planning and Development Regulations (in particular Part 20), and the European Union (Birds and Habitats) Regulations 2011 as amended.
Wildlife Act 1976, as amended	The requirements for the designation and protection of habitats and species in a natural heritage area (NHA) are set out in the Wildlife Act 1976, as amended.
EIA Directive	The relevant sections of the EIA Directive are transposed in Ireland through the Planning and Development Act (Part X) and the Planning and Development Regulations (in particular, Part 10, Schedule 5 and Schedule 6).

Legislation / Policy	Context
National Energy Security Framework	Ireland has one of the highest rates of importing fuel in Europe with imported dependency at 78% in 2023, according to the SEAI ¹ . Energy demand in Ireland has been growing and is expected to continue to increase by 37% to 2031 ² . The high rate of imported fossil fuel dependency and the increasing demand for electricity make it vital to introduce more domestic renewable energy generation such as the proposed project. The National Energy Security Framework ³ (DECC, 2022) sets out how Ireland is seeking to phase out dependency on Russian gas, oil and coal imports in order to address the urgent need to secure a long-term, resilient energy supply.
Climate Action and Low Carbon Development Act 2015 (as amended)	<p>The Climate Action Act provides for the establishment of a national framework with the aim of achieving a climate-resilient, biodiversity rich, environmentally sustainable and climate neutral economy by 2050 (referred to in the Climate Action Act as the “national climate objective”). The Climate Action Act 2015 was commenced in the days before the historic COP21 agreement in Paris where consensus was reached by 200 countries on the need to reduce greenhouse gas emissions.</p> <p>The Climate Act supports Ireland’s transition to Net Zero and a target of achieving a climate neutral economy by no later than 2050. It has established a legally binding framework containing clear targets and commitments which are set in law to embed the necessary structures and processes on a statutory basis to achieve our national, EU and international climate goals and obligations in the near and long term.</p>
Climate Action Plan 2025	The Plan was approved by Government on 15 th April 2025. Climate Action Plan 2024 builds upon the previous plan (Climate Action Plan 2025) by refining and updating the measures and actions

¹ SEAI. (2024). ENERGY IN IRELAND. chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.seai.ie/sites/default/files/publications/energy-in-ireland-2024.pdf [Accessed 06/08/2025]

² EirGrid. (2022). EirGrid's Generation Capacity Statement Predicts Challenging Outlook for Ireland

https://www.eirgridgroup.com/newsroom/eirgrids-generation-capac/#:~:text=The%20GCS%2C%20in%20its%20median,relatively%20consistent%20across%20the%20decade. [Accessed 06/08/2025]

³ Department of Climate, Energy and the Environment (2022) National Energy Security Framework <https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/national-energy-security-framework/> [Accessed 06/08/2025]

Legislation / Policy	Context
	required to deliver the carbon budgets and sectoral emissions ceilings, for example, a roadmap for taking decisive action to halve Irelands emissions by 2030 and to reach net zero no later than 2050. It also outlines the intention of the government to meet up to 80% of electricity demand from renewable power by 2030.
The National Planning Framework 2018-2027	The National Planning Framework (NPF) (which is given statutory recognition in the Planning and Development (Amendment) Act 2018) is intended to guide development and investment through a shared set of national objectives and principles. It is then left to the three regional planning bodies and the 31 city and county councils to take a lead in refining these into more detailed plans.
The National Development Plan 2021-2030	The National Development Plan (NDP) sets out the investment priorities that will underpin the implementation of the National Planning Framework, through a total investment of approximately €116 billion. This represents a very substantial commitment of resources and is expected to move Ireland close to the top of the international league table for per capita public investment.
Southern Regional Assembly Regional Spatial & Economic Strategy	<p>The Local Government Reform Act 2014 provided for three new regional assemblies: the Northern and Western, Eastern and Midland and Southern Regions. Members of the Regional Assemblies consist of the local authorities within that region.</p> <p>The Regional Spatial and Economic Strategy (RSES) for the Southern Regional Assembly area provides a long-term regional level strategic planning and economic framework, to support the implementation of the National Planning Framework, for the future physical, economic and social development for the Southern Region.</p>
The Limerick Development Plan 2022-2028	Under Section 9 of the Planning and Development Act, each planning authority is obliged to make a Development Plan for the whole of its functional area. The Development Plan (City/County Development Plan [CDP]) is a statutory land-use plan generally consisting of a written statement and associated maps. The Development Plan is the statutory land use plan which sets out a strategy for the proper planning and sustainable development for the area.

Legislation / Policy	Context
	The Limerick Development Plan 2022-2028 was adopted in June 2022.
The Wind Energy Development Guidelines, DoHLG 2006	The Wind Energy Development Guidelines (DoHLG, 2006) offer advice to planning authorities on planning for wind energy through the development plan process and in determining applications for planning permission. The guidelines are also intended to provide a consistency of approach throughout the country in the identification of suitable locations for wind energy development and the treatment of planning applications for wind energy developments.
Draft Revised Wind Energy Development Guidelines (Department of Housing, Local Government and Heritage, 2019)	<p>The Developer has had regard to the Draft Wind Energy Guidelines 2019, however the current version dated 2006 remain valid until the revised, final version of the Draft WEDGs (DOHLGH, 2019) are published by the government. The draft guidelines set out how wind energy is to be delivered in accordance with best practice and in particular, in partnership with people living in areas local to proposed developments. The Draft guidelines, provide a roadmap as to how Ireland's 2030 climate commitments can be met and ultimately move the country towards a position of net zero emissions by 2050. The key aspects for the new draft proposed wind energy guidelines include the following:</p> <ul style="list-style-type: none"> • A visual amenity setback of 4 times the turbine height between a wind turbine and the nearest residential property, subject to a mandatory minimum distance of 500 metres • the elimination of shadow flicker • The application of a more stringent noise limit, consistent with World Health Organisation standards • The introduction of new obligations in relation to community engagement with local communities along with the provision of community benefit measures.
The National Landscape Strategy for Ireland 2015-2025	<ul style="list-style-type: none"> • Ireland signed and ratified the Council of Europe's European Landscape Convention (ELC) which came into effect on 1 March 2004. The Convention has been ratified by thirty-eight countries. It obliges Ireland to implement policy changes and objectives concerning the management, protection and planning of the landscape. The National Landscape Strategy will be used to ensure compliance with the ELC and to establish

Legislation / Policy	Context
	<p>principles for protecting and enhancing it while positively managing its change. It is a high-level policy framework to achieve balance between the protection, management and planning of the landscape by way of supporting actions.</p>
<p>Water Framework Directive (2000/60/EC)</p>	<p>Water quality and quantity in our rivers, lakes, groundwaters, estuaries and coastal waters is assessed under the Water Framework Directive (WFD).</p> <p>The Water Framework Directive was signed into law in October 2000. It requires EU member States to achieve water quality of at least <i>Good Status</i> in rivers, lakes, groundwater, estuaries and coastal waters, by 2027 at the latest.</p> <p>Water quality has to be protected – no deterioration should be allowed occur – and restored where necessary to reach these environmental objectives.</p>
<p>National Biodiversity Plan 2023 - 2030</p>	<p>Ireland's 4th National Biodiversity Action Plan (NBAP) sets the national biodiversity agenda for the period 2023-2030 and aims to deliver the transformative changes required to the ways in which we value and protect nature.</p> <p>The 4th NBAP strives for a "whole of government, whole of society" approach to the governance and conservation of biodiversity. The aim is to ensure that every citizen, community, business, local authority, semi-state and state agency has an awareness of biodiversity and its importance, and of the implications of its loss, while also understanding how they can act to address the biodiversity emergency as part of a renewed national effort to "act for nature".</p> <p>This National Biodiversity Action Plan 2023-2030 builds upon the achievements of the previous Plan. It will continue to implement actions within the framework of five strategic objectives, while addressing new and emerging issues:</p>

Legislation / Policy	Context
	<ul style="list-style-type: none"> Objective 1 - Adopt a Whole of Government, Whole of Society Approach to Biodiversity Objective 2 - Meet Urgent Conservation and Restoration Needs Objective 3 - Secure Nature's Contribution to People Objective 4 - Enhance the Evidence Base for Action on Biodiversity Objective 5 - Strengthen Ireland's Contribution to International Biodiversity Initiatives

4.4 INTERNATIONAL POLICY

This section of the EIAR documents the international policy perspectives with regards to climate change and renewable energy. Ireland is party to both the United Nations Framework Convention on Climate Change and the Kyoto Protocol, which together provide an international legal framework for addressing climate change.

4.4.1 The United Nations Framework Convention on Climate Change

The United Nations Framework Convention on Climate Change (UNFCCC)⁴ implemented by the United Nations in May 1992, determined a long-term objective to lessen greenhouse gases in the atmosphere, with the purpose of preventing anthropogenic interference with the climatic system. Subsequently, the Kyoto Protocol was adopted in 1997. National governments who signed up to the Kyoto Protocol are committed to reducing their greenhouse gas emissions. The UNFCCC recognises that the climate system is a shared resource whose stability can be affected by industrial and other emissions of carbon dioxide and other greenhouse gases. The convention enjoys near universal membership, with 197 countries listed as being Parties of the Convention⁵.

The Paris Agreement (2016)

The Paris Agreement⁶ is a legally binding international treaty on climate change. It was adopted by 197 Parties at COP 21 in Paris, on 12 December 2015 and entered into force

⁴ The United Nations Framework Convention on Climate Change (UNFCCC) (1992). Available online at: <http://unfccc.int/resource/docs/convkp/conveng.pdf> [Accessed 06/08/2025]

⁵ http://unfccc.int/essential_background/items/6031.php [Accessed 06/08/2025]

⁶ <https://unfccc.int/process-and-meetings/the-paris-agreement> [Accessed 06/08/2025]

on 4 November 2016. It seeks to accelerate and intensify the actions and investment needed for a sustainable low carbon future. Its central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. The Agreement also aims to strengthen the ability of countries to deal with the impacts of climate change. The Paris Agreement commits the EU as a whole to reduce greenhouse gas emissions by at least 40% by 2030, compared with 1990 levels. This figure was revised upwards under Article 4 of Regulation 2021/1119⁷ by the EU in April 2021 to a 55% domestic Green House Gas reduction by 2030 compared to 1990.

The United Nation's (UN) 26th global climate summit was held in 2021 in Glasgow, where nations committed to a range of decisions in a collective effort to limit global temperatures to 1.5 degrees. The conference focussed on driving action across:

- Mitigation - reducing emissions
- Adaptation - helping those already impacted by climate change
- Finance - enabling countries to deliver on their climate goals
- Collaboration - working together to deliver even greater action

The 27th Global climate summit; The COP27 UN Climate Change Conference, was held in 2022 in Egypt. Agreement was reached on financing loss and damage from the impacts of climate change – an agreement which was negotiated in part by Ireland's Minister for Environment, Climate and Communications, Eamon Ryan.

At COP28 in Dubai (Nov. 2023), it was expected that the wording of the agreement will include a stronger message on "transitioning away from fossil fuels". This highlights the importance of alternative, renewable energy generation projects, such as the proposed Project.

Out of 196 Parties that have ratified the Paris Agreement, 90% mentioned renewables and roughly 70% included quantifiable energy targets in their initial Nationally Determined Contributions. However, a report by the International Energy Agency (IEA) 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

⁷ <https://eur-lex.europa.eu/eli/reg/2021/1119/oj/eng>

renewable energy pledges in the 2021 Paris agreement, the 1.5°C goal will still be exceeded before the end of the century.

Ireland is one of the 196 countries signed up to the Paris agreement, under the terms, Ireland is required to reduce greenhouse gas emissions by at least 40% by 2030 when compared with levels in 1990. The Project will displace heavily polluting fossil fuels by producing renewable wind energy and contribute to achieving this target.

4.4.2 COP28

At COP28 in Dubai (Nov. 2023), although the wording of the agreement didn't signify an imminent "transitioning away from fossil fuels", the agreement signals the "beginning of the end" of the fossil fuel era by laying the ground for a swift, just and equitable transition. This agreement highlights the importance of alternative, renewable energy generation projects to facilitate this transition.

COP28 was particularly momentous as it marked the conclusion of the first 'global stocktake' of the world's efforts to address climate change under the Paris Agreement. Having shown that progress was too slow across all areas of climate action – from reducing greenhouse gas emissions, to strengthening resilience to a changing climate, to getting the financial and technological support to vulnerable nations – countries responded with a decision on how to accelerate action across all areas by 2030. This includes a call on governments to speed up the transition away from fossil fuels to renewables such as wind and solar power in their next round of climate commitments.

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⁸ IEA. (2021) Renewables 2021 <https://www.iea.org/reports/renewables-2021> [Accessed 06/08/2025]

⁹ IRENA. (2021) https://www.irena.org/-/media/Files/IRENA/Agency/Publication/2022/Jan/IRENA_NDCs_RE_Targets_2022.pdf [Accessed 06/08/2025]

4.4.3 COP29 – Azerbaijan (2024)

At COP29 in Baku (Dec. 2024), several pivotal agreements were reached. A new climate finance goal was set to mobilize \$300 billion annually by 2035, with efforts to raise \$1.3 trillion per year from public and private sources. An agreement on carbon markets was established, creating pathways for sustainable business actions. Additionally, a new loss and damage fund was operationalized, with \$800 million pledged to aid adaptation efforts. Enhanced measures for transparent climate reporting were also agreed upon to ensure accountability and progress tracking. These agreements aim to accelerate global climate action and support vulnerable nations in adapting to climate impacts.

4.4.4 Project Compliance with International Climate Policy

Ireland is one of the 196 countries signed up to the Paris Agreement, under the terms, Ireland is required to reduce greenhouse gas emissions by at least 40% by 2030 when compared with levels in 1990. The proposed Project will contribute to Ireland meeting these targets by displacing reliance on fossil fuels.

4.5 EUROPEAN LEGISLATION & POLICY CONTEXT

The European Union's (EU) energy policies are set out and powered by three main objectives:

- To ensure energy providers operate in a competitive environment, ensuring affordable prices for homes and businesses.
- To secure energy supplies and to ensure reliable energy delivery whenever and wherever it is needed; and
- To have sustainable energy consumption, through lowering dependence on fossil fuels and decreasing greenhouse gas emissions and pollution.

The importance of delivering on these key objectives have been underlined by the Commission's robust and ambitious response to the ongoing conflict in Ukraine – and has seen a suite of legislation files introduced in the sustainability and environmental sectors in its current mandate.

The EU will be climate neutral by 2050. To do this, it will carry out a series of initiatives that will protect the environment and boost the green economy¹⁰.

¹⁰European Commission. https://climate.ec.europa.eu/eu-action/climate-strategies-targets/2050-long-term-strategy_en [Accessed 06/08/2025]

4.5.1 EU Directive 2011/92/EU (as amended by EU Directive 2014/52/EU)

European Union Directive 2011/92/EU as amended on the assessment of the effects of certain public and private projects on the environment (the 'EIA Directive'), is transposed into Irish planning legislation by the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001 (as amended). The objective of the Directive (Directive 2011/92/EU), as amended by Directive 2014/52/EU, is to ensure a high level of protection of the environment and human health, through the establishment of minimum requirements for EIA, prior to development consent being given, of public and private developments that are likely to have significant effects on the environment.

Planning Authorities and An Coimisiún Pleanála have extensive experience in assessing the effects of proposed developments on the environment as this is an integral part of considering whether the proposal is in the interests of the proper planning and sustainable development of the area.

Amending Directive 2014/52/EU defined the EIA process as a process consisting of:

- (a) the preparation of an Environmental Impact Assessment Report (EIAR) by the Developer
- (b) the carrying out of consultations
- (c) the examination by the competent authority of the EIAR, any supplementary information provided, where necessary, by the developer and relevant information received through consultations with the public, prescribed bodies and any affected Member States
- (d) the reasoned conclusion of the competent authority on the significant impacts of the project on the environment and
- (e) the integration of the competent authority's reasoned conclusion into any development consent decision.

4.5.2 Clean Industrial Deal 2025

The deal is an umbrella strategy setting out concrete actions to turn decarbonisation into a driver of growth for European industries. This includes lowering energy prices, creating quality jobs and the right conditions for companies to thrive.

The Deal presents measures to boost every stage of production, with a focus on:

- energy-intensive industries such as steel, metals, and chemicals, that urgently need support to decarbonise, switch to clean energy, and tackle high costs, unfair global competition, and complex regulations

- the clean-tech sector which is at the heart of future competitiveness and necessary for industrial transformation, circularity, and decarbonisation.

The main elements of the deal are:

- Affordable energy
- Boosting demand for clean products
- Financing the clean transition
- Circularity and access to material
- Acting on global scale
- Skills and quality jobs

4.5.3 Renewable Energy Directive

The EU passed the Renewable Energy Directive (REDI) 2009/28/EC, revised in 2018 and 2023, to make the EU a global leader in renewable energy and ensure that the target of the final energy consumption for the current RED III is achieved.

In 2023, the European Union (EU) adopted an amendment of the Renewable Energy Directive, which is referred to as “RED III”. RED III obliges Member States to collectively ensure the share of renewable energy in the European Union's gross final energy consumption is at least 42.5% by 2030, with an additional 2.5% indicative top-up to allow the target of 45% to be achieved.

RED III also places the presumption of overriding public interest for renewable energy projects (IROPI) on a permanent footing. Article 16f states that Member States must ensure that in the permit-granting procedure, the planning, construction and operation of renewable energy plants, their connection to the grid, the grid itself and storage assets are presumed to be IROPI.

Furthermore, Article 16b(1) provides that the permit-granting procedure for onshore renewable energy projects outside renewables acceleration areas must not exceed two years.

The transposition deadline for these provisions was 1 July 2024. An infringement notice has been served on Ireland in respect of its failure to meet this deadline.

4.5.4 The European Green Deal 2019

The European Green Deal 2019¹¹ resets the European Commission's commitment to tackling climate and environmental-related challenges. It focuses on three key principles for the clean energy transition, which will help reduce greenhouse gas emissions and enhance the quality of life of our citizens:

- (1) Ensuring a secure and affordable EU energy supply.
- (2) Developing a fully integrated, interconnected and digitalised EU energy market.
- (3) Prioritising energy efficiency, improving the energy performance of our buildings and developing a power sector based largely on renewable sources.

The European Green Deal is a plan to make the EU's economy sustainable. The EU aims to be climate neutral in 2050. Reaching this target will require action in all sector economy, including:

- Investing in environmentally friendly technologies
- Supporting industry to innovate
- Rolling out cleaner, cheaper and healthier forms of private and public transport
- Decarbonising the energy sector
- Ensuring buildings are more energy efficient
- Working with international partners to improve global environmental standards
- Sustainable finance – all of which are strongly interlinked.

The European Climate Law (2021) writes into law the goal set out in the European Green Deal (2019) for Europe's economy and society to become climate-neutral by 2050. This law binds member states into taking measures necessary to meet targets, with progress being reviewed every 5 years.

4.5.5 REPowerEU

In May 2022, The European Commission presented the REPowerEU Plan¹², in response to the global energy market disruption caused by Russia's invasion of Ukraine. It puts forwards a set of actions to:

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

¹¹ <https://www.consilium.europa.eu/en/policies/european-green-deal/#what> [Accessed 06/08/2025]

¹² European Commission. (2022). REPowerEU Plan https://eur-lex.europa.eu/resource.html?uri=cellar:fc930f14-d7ae-11ec-a95f-01aa75ed71a1.0001.02/DOC_1&format=PDF [Accessed 06/08/2025]

It states:

“Lengthy administrative procedures are one of the key barriers for investments in renewables and their related infrastructure. These barriers include the complexity of the applicable rules for site selection and administrative authorisations for projects, the complexity and duration of the assessment of the environmental impacts of the projects, grid connection issues, constraints on adapting technology specifications during the permit-granting procedure or staffing issues of the permit-granting authorities or grid operators. In order to accelerate the pace of deployment of renewable energy projects it is necessary to adopt rules which would simplify and shorten permit-granting processes.”

The REPowerEU Plan also includes proposed amendments to the Renewable Energy Directive¹³ including:

- Specifying that renewable energy plants are presumed to be of overriding public interest.
- Increasing the Union's renewable energy target to 45% – up from 40% in the Commission's initial Fit-for-55 energy package.

In 2021, the EU reached a 22.8%¹⁴ share of its gross final energy consumption from renewable sources – down from 22.1% in 2020. This leaves a long way to go to reach this increased target. In accordance with the REPowerEU Communication, in May 2022, the Commission published a recommendation¹⁵ on speeding up permit-granting procedures for renewable energy projects, accompanied by guidance to help the Member States speed up permitting for renewable energy plants.

The recommendation was created in order to help Member States exploit all possibilities for acceleration that exist within the legislative framework. It proposes measures to streamline procedures at national level, addresses ambiguities in the application of EU legislation and sets out good practices in Member States. It recommends participatory approaches that involve local and regional authorities and providing authorities with the necessary resources so as to facilitate the timely realisation of locally adapted investments.

Recommendations include:

¹³European commission. (2022). <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52022PC0222&from=EN> [Accessed 06/08/2025]

¹⁴ European Commission. (2023). https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Renewable_energy_statistics#Share_of_renewable_energy_more_than_doubled_between_2004_and_2020 [Accessed 06/08/2025]

¹⁵EU. [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=PI_COM:C\(2022\)3219&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=PI_COM:C(2022)3219&from=EN) [Accessed 06/08/2025]

*“Member States should ensure that the planning, construction and operation of plants for the production of energy from renewable sources, their connection to the electricity, gas and heat grid and the related grid itself and storage assets **qualify for the most favourable procedure available in their planning and permit-granting procedures** and are presumed as being in the overriding public interest and in the interest of public safety, in view of the legislative proposal amending and strengthening the provisions of Directive (EU) 2018/2001 related to administrative procedures and without prejudice to the Union law.”*

“Member States should establish clearly defined, accelerated and as short as possible deadlines for all the steps required for the granting of permits to build and operate renewable energy projects, specifying the instances where such deadlines may be extended and under which circumstances. Member States should establish binding maximum deadlines for all relevant stages of the environmental impact assessment procedure.”

4.5.6 Project Compliance with European Climate Legislation

The Project is compliant with EU policy and legislation as it contributes towards the goal of decarbonising the energy sector in the EU and increasing the supply of renewable energy sources. The proposed Project in Garrane, County Limerick will have an installed capacity of 54MW of renewable energy which would contribute towards the REDIII targets for 2030 and help to prevent further requirements to acquire statistical transfers from other Member States.

4.6 NATIONAL, REGIONAL AND LOCAL POLICY

This section sets out the key planning and other related policies from a national, regional and local perspective. **Figure 4.1** provides an overview of National Planning Policy Context in Ireland.



Figure 4.1: Hierarchy of National Planning Policy Context.

The National Planning Framework is assessed in section 4.6.1.7. The Regional Spatial and Economic Strategy is assessed in section 4.6.2.1. The relevant County Development Plans is assessed in **Section 4.6.3.1** and **Section 4.6.3.2**. The Development is not located in a Local Area plan.

4.6.1 National Policy

4.6.1.1 National Planning Framework - Project 2040

Ireland has developed a strategic outlook for the future development of the country under the 'Project Ireland 2040'¹⁶. Project 2040 comprises two plans, The National Planning Framework (NPF) and the ten-year National Development Plan (NDP) which will guide strategic development and infrastructure investment at the national level. The NDP 2018-2027 sets out investment priorities of €21.8 billion for climate action for the 10-year period, €7.6 billion is to come from the Exchequer. The remaining investment is to be made by Ireland's semi-state companies and by the private sector. In addition, some €8.6 billion funding has been made available for sustainable mobility projects, mostly in public transport. This substantial funding increase will facilitate upscaling of investments and implementation of actions needed to move the country towards its 2030 climate targets.

¹⁶ Department of Housing, Planning and Local Government (2023) Project 2040. Available at: [chrome-extension://efaidnbmnnnibpcajpcgclefindmkaj/https://www.npf.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf](https://www.npf.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf) [Accessed 06/08/2025]

Section 1.5 of the NPF sets out that *“sustainability is at the heart of long-term planning and the National Planning Framework seeks to ensure that the decisions we make today, meet our own needs without compromising the ability of future generations to meet their needs.”*

The NPF with the NDP will also set the context for each of Ireland's three regional assemblies to develop their Regional Spatial and Economic Strategies taking account of and co-ordinating Local Authority County and City Development Plans in a manner that will ensure national, regional and local plans align. The National Planning Framework is based on a set of values that will ensure Ireland's “long term economic, environmental and social progress for all parts of the country”.

On the 8th of April 2025, the Government approved the Revised National Planning Framework (NPF). On the 30th of April both Houses of the Oireachtas approved the Revised NPF. The Revised NPF firmly sets the direction for Ireland's growth and development to 2040. It sets a new spatial policy for the country with a view to addressing critical priorities, in particular housing, infrastructure and climate.

The NPF sets a number of shared goals for Ireland which the Development will contribute to achieving, including:

- Strengthened rural economies and communities
- A strong economy, supported by enterprise, innovation and skills
- Transition to a carbon neutral and climate resilient society

NPF Chapter 9 states that *“The Government has committed to achieving targets underpinned by the adoption of a series of carbon budgets and national Climate Action Plans over the period to 2050, informed by UN and EU policy. These actions are also underpinned by other key national policies including the National Development Plan, National Adaption Framework and by Sectoral Adaptation Plans. In addition to legally binding targets agreed at EU level, it is a national objective for Ireland to transition to be a competitive zero carbon, economy no later than 2050.*

Transition to a Carbon Neutral and Climate Resilient Society

“The Climate Action and Low Carbon Development (Amendment) Act was enacted in 2021 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.”

National Policy Objective 69

“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.”

National Policy Objective 70

“Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050.”

In order to facilitate the accelerated deployment of renewable electricity infrastructure and to achieve the national targets outlined in the Climate Action Plan 2025, the revised National Planning Framework (NPF) establishes regional renewable energy capacity allocations. These allocations are to be embedded within the Regional Spatial and Economic Strategies (RSES) and the corresponding Regional Renewable Energy Strategies, and subsequently disaggregated into county-level targets to inform the preparation of city and county development plans. The additional renewable power capacity allocation for onshore wind for the Southern Region is 978 MW.

National Policy Objective 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.

National Policy Objective 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.

4.6.1.2 Climate Action and Low Carbon Development Act 2015

The Climate Action and Low Carbon Development Act, 2015 was signed into law on 10 December 2015. The Act provides for the establishment of a national framework with the aim of achieving a low carbon, climate resilient, and environmentally sustainable economy by 2050, referred to in the Act as the “national transition objective”. The Act provides the tools and structures to transition towards a low carbon economy and it anticipates that it will be achieved through a combination of:

- A national mitigation plan (to lower Ireland’s level of greenhouse gas emissions)
- A national adaptation framework (to provide for responses to changes cause by climate change)
- Tailored sectoral plans (to specify the adaptation measures to be taken by each Government ministry)
- Establishment of the Climate Change Advisory Council to advise Ministers and the Government on climate change matters.

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

At a national level, the Climate Act 2021 commits Ireland to reach a legally binding target of net-zero emissions no later than 2050, and a cut of 51% by 2030 (compared to 2018 levels). It 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 Ireland’s 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 An Coimisiún Pleanála 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 above requirement is a mandatory obligation.

The National Climate Policies and Objectives listed in section 15, with which the Commission must comply, all support the development of wind energy projects and associated grid connections in accordance with proper planning and sustainable development.

The recent judgement of the High Court delivered on 10th January 2025 provides clarity on the obligations imposed on public bodies under section 15 of the Climate Act (Coolglass Wind Farm Limited v An Bord Pleanála [2025] IEHC 1). Mr Justice Humphreys undertook a detailed consideration of the interpretation of section 15 of the Climate Act and concluded that, when deciding upon an application relevant to the achievement of climate plans and objectives under S.15 of the Act, relevant bodies, in this case the Commission, is required to:

1. Consider which option available to it as the decision maker, grant or refuse permission, would contribute to achieving Ireland's climate targets and the wider objectives of section 15 – which Mr Justice Humphreys went on to conclude "in the case of renewable energy projects, the answer the answer to that will almost always be a grant of permission".
2. Consider whether granting permission is “precluded by a mandatory and non-flexible legal requirement” that does not grant the decision maker any discretion or evaluative judgment in reaching an outcome favouring climate goals, i.e. a grant of permission.
3. If the decision maker is not precluded from granting permission, then how can the planning authority use its evaluative judgement and discretion to reach an outcome favouring these policy goals.

The Project, if granted, would clearly contribute to climate targets.

There are no mandatory and non-flexible legal requirements that prevent the Commission from reaching an outcome, in relation to the proposed Project, that favours policy goals, i.e. granting permission. The Project is supported by local, regional and national policy and will be constructed and operated in accordance with national guidance and best practice. It has also been demonstrated, in the EIAR and NIS, that the Project will not give rise to any significant effect on the environment or have an adverse effect on the integrity of European Sites. With these matters considered, it is respectfully submitted that the Commission is obliged to exercise their evaluative judgement to reach an outcome favouring policy goals, in accordance with their obligation under section 15 of the Climate Act and grant permission.

On the 20th May 2025, the Supreme Court granted leave to appeal to the Commission to appeal the High Court's decision in the Coolglass case.

The Act also includes the following key elements:

- It 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.
- It embeds the process of carbon budgeting into law. Government are 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.

A recent report from the EPA Ireland's Greenhouse Gas Emissions Projections¹⁷ found that Ireland is not on track to meet the 51 per cent emissions reduction target (by 2030 compared to 2018), indicating that further measures are needed. The Project will contribute to bridging this gap and meeting this target.

4.6.1.4 Climate Emergency

On 29th November 2019 the European Parliament declared a climate emergency ahead of the UN COP25 in Madrid in December 2019. In May 2019, the Oireachtas declared a "climate emergency" in an amendment to the report 'Climate Action: A cross-party consensus for action' which followed the recommendations of the Citizens Assembly on Climate Action. There then followed the publication of the Cross-Departmental Climate Action Plan 2019 on 17th June 2019 this was revised in 2021, 2023, 2024 and 2025.

4.6.1.5 Climate Action Plan 2025

The Climate Action Plan 2025¹⁸ (CAP2025) was published in April 2025 and is the latest assessment and measurement of what has been achieved over the past year, building on actions taken in 2024. It sets out what need to be done in 2025 so Ireland is prepared to take on the challenges of our second carbon budget period 2026-2030.

Ireland's Progress to date:

- In 2023 emissions reduced by nearly 7%
- Emissions in the first half of 2024 were down over 17%
- Compared with the same period in 2023, emissions in the first half of 2024 reduced by 3.5%

¹⁷ EPA 2023. <https://www.epa.ie/our-services/monitoring--assessment/climate-change/ghg/> [Accessed 06/08/2025]

¹⁸ Department of Communications, Climate Action and Environment. (2025). Climate Action Plan 2025. <https://www.gov.ie/en/department-of-the-environment-climate-and-communications/publications/climate-action-plan-2025/> [Accessed: 06/08/2025]

- Irish wind farms generated nearly 40% of Ireland's total electricity demand in the first half of 2024
- Over the past year, emissions in agriculture have reduced by over 4%
- In the built environment, emissions have decreased by 21% since 2018
- In transport, emissions increased by 0.3% in 2023

CAP25 re-affirms the previous commitment to increasing the share of renewable electricity to 50% by 2025 and 80% by 2030. Overall, the share of renewable electricity generation in Ireland increased from 38.6% to 40.7% from 2022 to 2023. The figure for 2024 will likely be between 40% and the interim, end of year target of 50% set out in CAP25.

The targets are:

- onshore wind, 2GWs by 2025 and 9 GWs by 2030
- offshore wind, at least 8GWs by 2030
- solar, up to 5GW by 2025 and 8GW by 2030

These targets are unchanged for the previous two years. CAP25 states

“A renewables-led system is at the core of Ireland's plan to radically reduce emissions in the electricity sector, protect our energy security, and ensure our economic competitiveness. This requires the accelerated and increased deployment of new renewable electricity generation capacity and related infrastructure.”

4.6.1.6 National Energy and Climate Plan 2021-2030

The National Energy and Climate Plan (ENCP)¹⁹ is a ten-year integrated document mandated by the European Union to each of its member states in order for the EU to meet its overall greenhouse gases emissions targets.

The plan establishes key measures to address the five dimensions of the EU Energy Union;

- 1) Decarbonisation: GHG emissions and removals and Renewable Energy
- 2) Energy efficiency
- 3) Energy security
- 4) Internal energy market
- 5) Research, innovation and competitiveness

Key, relevant renewable energy objectives include:

¹⁹ Department of Communications, Climate Action and Environment. (2021). National Energy and Climate Plan https://energy.ec.europa.eu/system/files/2020-08/ie_final_necp_main_en_0.pdf [Accessed 06/08/2025]

- Ireland has established an objective of achieving a 34% share of renewable energy in energy consumption by 2030.
- Increase electricity generated from renewable sources to 70% (note this target has been increased to 80% in the CAP2024), underpinned by the Renewable Electricity Support Scheme (RESS).
- Streamline consenting and connection arrangements.
- Phase-out of coal and peat-fired electricity generation
- Increase onshore wind capacity by up to 8.2 GW (note increase to 9 GW in the CAP2024)

Key, relevant energy security objectives include:

- Support efforts to increase indigenous renewable sources in the energy mix, including wind, solar and bioenergy.
- 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.

According to a report published by the Environmental Protection Agency (EPA) in May 2025, Ireland is not on track to meet the national target of 51% emissions reduction target by 2030 compared to 2018 under the Climate Action and Low Carbon Development 2015 (as amended), nor is it projected to meet its EU target of 42% emissions reduction compared to 2005 under the Effort Sharing Regulations. Almost all sectors are on a trajectory to exceed their national ceilings – including agriculture, industry, electricity and transport.

4.6.1.7 National Energy Security Framework

In April 2022, the Government of Ireland issued the National Energy Security Framework²⁰ in response to the European Commission's REPowerEU action statement. It provides a single overarching and initial response 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, emphasising throughout the urgency of the need to secure Ireland's energy supply.

It is focussed on three areas of work:

²⁰ Government of Ireland. (2022) National Energy Security Framework. <https://assets.gov.ie/221399/86cb99f5-58e3-4821-bc4c-e1bb1fa706fb.pdf> [Accessed 06/08/2025]

- 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 framework highlights the impact of the Russian invasion of Ukraine on energy security, consumer price wise in the short term and how and where energy is sourced to ensure long term system resilience. It notes that:

“The war has highlighted key dependencies in our energy system which can no longer be relied on and has led to affordability issues for many consumers and businesses”.

The framework builds on the idea of energy security as the uninterrupted availability of energy sources at an affordable price and is a response to the challenges of ensuring the ongoing and long-term security of affordable energy supply.

Ireland has one of the highest rates of importing fuel in Europe with imported dependency at 78% in 2023, according to the latest report published by SEAI²¹. Energy demand in Ireland has been growing and is expected to continue to increase by 37% to 2031²². In the first nine months of 2023, Ireland imported over 9% of its electricity, significantly reducing Ireland's electricity emissions in that period. Energy demand in Ireland has been growing and is expected to continue to increase, especially electricity demand which is expected to grow by 37% to 2031²³. Increases to the cost of carbon, supply issues and potential political insecurity increases fossil fuel price volatility. The high rate of imported fossil fuel dependency and the increasing demand for electricity make it vital to introduce more domestic renewable energy generation plants, such as the Garrane Green Energy Project to provide reliable, secure and affordable energy supplies in Ireland.

²¹ SEAI. (2024). ENERGY IN IRELAND. chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.seai.ie/sites/default/files/publications/energy-in-ireland-2024.pdf [Accessed 06/08/2025].

²² EirGrid. (2022). EirGrid's Generation Capacity Statement Predicts Challenging Outlook for Ireland https://www.eirgridgroup.com/newsroom/eirgrids-generation-capac/#:~:text=The%20GCS%2C%20in%20its%20median,relatively%20consistent%20across%20the%20decade. [Accessed 06/08/2025]

²³ EirGrid. (2022). EirGrid's Generation Capacity Statement Predicts Challenging Outlook for Ireland https://www.eirgridgroup.com/newsroom/eirgrids-generation-capac/#:~:text=The%20GCS%2C%20in%20its%20median,relatively%20consistent%20across%20the%20decade. [Accessed 06/08/2025]

Energy Security in Ireland to 2030

Energy Security in Ireland to 2030 outlines a new strategy to ensure energy security in Ireland for this decade, while ensuring a sustainable transition to a carbon neutral energy system by 2050. This report is being published as part of an Energy Security Package, containing a range of supplementary analyses, consultations, and reviews, which have informed the recommendations and actions related to energy security.

Informed by the Government's energy security policy objectives - to ensure energy is affordable, sustainable, and secure - the review considered the risks to oil, natural gas, and electricity. The report sets out that Ireland's future energy will be secure by moving from an oil and gas-based energy system to an electricity-led system, maximising our renewable energy potential, flexibility and being integrated into Europe's energy systems. Meeting our climate, renewable, and energy efficiency targets through actions and measures set out in the annually updated Climate Action Plan will deliver this secure energy future.

As we transition, the Energy Security Package states that we must ensure energy security is prioritised, monitored, and reviewed regularly, and includes a range of measures to implement this approach in the short and medium term by prioritising:

- Reduced and Responsive Demand
- A Renewables-Led System
- More Resilient Systems
- Robust Risk Governance

Under each of these four areas of actions, the report sets out a range of mitigation measures, including the need for additional capacity of indigenous renewable energy, but also energy imports, energy storage, fuel diversification, demand side response, and renewable gases. The governance structures supporting the energy system, including oversight and accountability reforms, were also examined.²⁴

4.6.1.8 National Energy & Climate Plan 2021-2030

In accordance with the Governance of the Energy Union and Climate Action Regulation, Ireland's first National Energy & Climate Plan (NECP)²⁵ 2021-2030 was published in June 2020.

²⁴ <https://www.gov.ie/en/publication/5c499-energy-security-in-ireland-to-2030/> [Accessed 06/08/2025]

²⁵ https://energy.ec.europa.eu/system/files/2020-08/ie_final_necp_main_en_0.pdf [Accessed: 06/08/2025]

The first draft of the NECP took into account energy and climate policies to that date as well as the levels of economic and demographic growth predicted under Project 2040 and the climate and energy measures set out under the National Development Plan 2018-2027.

The NECP incorporates all planned policies and measures identified up to the end of 2019 which aim to deliver a 30% reduction in non-ETS greenhouse gas emissions (from 2005 levels) by 2030.

Ireland is committed to achieving a 7% annual average reduction in greenhouse gas emissions between 2021 and 2030. However, the NECP reflects the current EU effort sharing approach and not this higher level of commitment. Therefore, the NECP will be revised to take account of these commitments required for the increase in the overall EU contribution agreed as part of the Paris Agreement.

4.6.1.9 White Paper on Energy Policy in Ireland 2015 – 2030

A Government White Paper entitled '*Ireland's Transition to a Low Carbon Energy Future 2015-2030*' was published in December 2015 by the Department of Communications, Energy and Natural Resources²⁶. This Paper provides a complete energy update and a framework to guide policy up to 2030. The Paper builds upon the White Paper published in 2007 and takes into account the changes that have taken place in the energy sector since 2007. The White Paper describes the advances in Ireland's energy efficiency and renewable energy and generation use between 2007 and 2015. Renewable electricity sources (including wind) accounted for 27% of Ireland's electricity consumption in 2015²⁷, which was just over halfway to Ireland's 2020 target of 40%

The policy framework sets out a vision for a low carbon future that maintains Ireland's competitiveness and ensures a supply of affordable energy. The paper advises that a range of policy measures will be employed to achieve this vision and will involve generating electricity from renewable sources, of which there is plentiful indigenous supplies, and increasing the use of electricity and bio-energy to heat homes and fuel. The impacts of climate change in the context of EU and national policy refers to the change in climate that is attributable to human activity arising from the release of greenhouse gases into the atmosphere and which is additional to natural climate variability (Department of the Environment, Heritage and Local Government, 2006). In 2008, the Environmental

²⁶ <https://www.gov.ie/pdf/?file=https://assets.gov.ie/77389/e5aa9f25-da81-43eb-804d-57309615681e.pdf#page=null> [Accessed: 06/08/2025]

²⁷ SEAI (2015) Energy Efficiency in Ireland. Available at: chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.seai.ie/sites/default/files/publications/Energy-Efficiency-in-Ireland-2016-Report.pdf [Accessed: 06/08/2025]

Protection Agency (EPA) published the results of a study entitled '*Climate Change – Refining the Impacts for Ireland*', as part of the STRIVE (Science, Technology, Research and Innovation) Programme 2007 – 2013. This report states that mean annual temperatures in Ireland have risen by 0.7° Celsius (C) over the past century. Mean temperatures in Ireland relative to the 1961 to 1990 averages are likely to rise by 1.8 to 4.0°C by the 2050s and by in excess of 2°C by the end of the century due to climate change.

Future precipitation changes are less certain to predict than temperature but constitute the most important aspect of future climate change for Ireland. The study projects that winter rainfall in Ireland by the 2050's will increase by approximately 10%, while summer rainfalls will reduce by 12 – 17%. Lengthier heat-waves, much reduced number of frost days, lengthier rainfall events in winter and more intense downpours and an increased propensity for drought in summer are also projected. The STRIVE report on climate change impacts states that Ireland can and must adapt to the challenge of climate change. It notes that: *"Barriers to this, both scientific and socio-economic, are required to be identified and addressed in order that Ireland can be optimally positioned to thrive in a changing world."*

The report discusses the impacts of climate change in terms of water resource management, agriculture and biodiversity.

4.6.1.10 Emissions Projections

In 2025, the EPA published an update on Ireland's Greenhouse Gas Emissions Projections to 2055²⁸. Ireland's 2030 target under the EU's Effort Sharing Regulation (ESR) is to deliver a 42% reduction of emissions compared to 2005 levels by 2030. This target was set in April 2023 upon amendment of the ESR. The ESR includes sectors outside the scope of the EU Emissions Trading System (EU-ETS) such as Agriculture, Transport, Residential, Public/Commercial Services and Waste and is also referred to as a "non-ETS".

Ireland is not on track to meet the 51 per cent emissions reduction target (by 2030 compared to 2018) which include many 2024 Climate Action Plan measures. Greenhouse gas emissions are projected to be 9 to 23 per cent lower by 2030 (compared to 2018) which places Ireland further from the 2030 national climate target compared to previous assessments.

²⁸ <https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/07875-EPA-GHG-Projections-Report-FINAL.pdf> [Accessed: 06/08/2025]

Greenhouse gas emissions are projected to 2050 using two scenarios; '*With Existing Measures*' and '*With Additional Measures*'. The '*With Existing Measures*' scenario is a projection of future emissions based on the measures currently implemented and actions committed to by Government. To become part of the WEM scenario a policy or measure must be in place by the end of 2022 (the latest inventory year) and, in parallel, the resources and/or legislation already in place or committed to by Government Departments or Agencies. The '*With Additional Measures*' scenario is the projection of future emissions based on the measures outlined in the latest Government plans at the time Projections are compiled. This includes all policies and measures included in the WEM scenario, plus those included in Government plans but not yet implemented.

The EPA Emission Projections (2025) notes the following key trends:

- Under the WEM scenario, emissions from the energy industries sector are projected to decrease by 59% from 10.6 to 4.4 Mt CO₂ eq over the period 2022 to 2030.
- Under the WAM scenario, emissions from the energy industries sector are projected to decrease by 68% from 10.6 to 3.4 Mt CO₂ eq over the period 2022 to 2030.

Although it should be noted that the projected emission decreases under the WEM and WAM scenarios are based over the period 2022-2030 and are not compared to the 2005 levels.

4.6.1.11 Department of Communications Climate Action and Environment: Renewable Electricity Support Scheme 2018 (RESS)

The Renewable Electricity Support Scheme (RESS) provides support to renewable electricity projects in Ireland. With a primary focus on cost effectiveness, the RESS delivers a broader range of policy objectives, including:

- enabling communities to participate in renewable energy projects
- increasing renewable technology diversity
- delivering an ambitious renewable electricity policy to 2030
- increasing energy security, energy sustainability and ensuring the cost effectiveness of energy policy

It was introduced to promote investment in renewable energy generation to support the growth of the green economy, create sustainable work opportunities, and ultimately benefit the consumer as renewables become more cost effective. The Programme for Government commits to hold RESS auctions at frequent intervals throughout the lifetime of the scheme. This will allow Ireland to take advantage of falling technology costs and avoid 'locking in'

higher costs for consumers. If consented the proposed Garrane Green Energy Project will also provide a community fund calculated in accordance with the Renewable Electricity Support Scheme (RESS) Terms and Conditions at €2 per megawatt hour (MWh) of electricity produced by the project. This is to be made available to the local community for the duration of the RESS (15 years).

The delivery of the fourth onshore RESS auction, RESS 4, was seen as a pivotal component of meeting Ireland's ambitious targets of 80% renewable electricity (RES-E) by 2030.

2,071 GWh of renewable generation was provisionally successful in this year's auction. This is a significant improvement from last year's RESS 3 auction result, which delivered less than half of the minimum 2,000 GWh target.

Overall, provisionally successful projects in the RESS 4 auction are set to increase Ireland's renewable energy capacity by more than 20%.

A provisional auction timetable has been set out for RESS 5. The proposed modifications in the Community Benefit Funds under RESS, which includes potential changes in the Terms and Conditions for RESS 5 include:

- Near Neighbor Payments for Onshore Wind: fixed amount and distances, eligibility and cap on overall spending,
- Relationship with Local Authorities mandated Funds,
- Role and selection of the Fund Committee,
- Simplified structure for smaller CBFs,
- Administration: limit on cost and requirements for the role
- Transparency

4.6.1.12 Project Compliance with National Climate Policy

The proposed Project will generate renewable energy, reducing Ireland's carbon footprint by displacing fossil fuels and contributing to national climate policy mitigation objectives. The proposed Project meets the objectives of Project 2040 as it will contribute to the economic, environmental, and social objectives of the NPF, in particular National Policy Objectives 54 & 55. In support of the CAP25 objectives, the Project will contribute to the decarbonisation of the Irish electricity network by producing between 54MW of renewable electricity, contributing to the Government's 80% renewable electricity target by 2030. This will help to mitigate climate change by reducing the emissions related to energy production and will help to decarbonise multiple sectors.

4.6.2 Regional Policy

4.6.2.1 *The Regional Spatial and Economic Strategy (RSES) for the Southern Regional Assembly (SRA)*

The Local Government Reform Act 2014 provided for the dissolution of the eight regional authorities and two regional assemblies and for their replacement with three new regional assemblies. The three new regional assemblies were established in 2015 representing the Northern and Western, Eastern and Midland and Southern Regions. Members of the Regional Assemblies consist of the local authorities within that region.

The Regional Spatial and Economic Strategy (RSES) for the Southern Regional Assembly (SRA) came into effect on 31st January 2020. The objective of the RSES is to support the implementation of the National Planning Framework and the economic policies and objectives of the Government by providing a long-term planning and economic framework which shall be consistent with the National Planning Framework (NPF) and the economic policies or objectives of the Government. The RSES sets objectives at a regional level, informs County Development Plan and Local Areas Plans.

The RSES provides a development framework of the region that supports the implementation of the NPF and the relevant economic policies and objectives of the government. It provides a 12-year strategy for the period 2020 – 2032 to achieve the objectives and vision of the regional assembly. Within the RSES, the Regional Policy Objectives (RPO) in relation to renewable energy are set out in **Table 4.2**.

Table 4.2: Key Planning Policy Objectives from the RSES

Regional Policy Objective (RPO)	Project contribution
<i>RPO 40 Regional Economic Resilience; It is an objective to sustainably develop, deepen and enhance our regional economic resilience by widening our economic sectors, boosting innovation, export diversification, productivity enhancement and access to new markets.</i>	The Project represents a major investment in the region and in renewable energy. It will provide an improved and more resilient renewable electricity supply in the area. This could attract new enterprise to the region, bringing jobs, economic growth and diversification. The increased renewable electricity supply will also help to meet increased demand to facilitate further economic growth.

Regional Policy Objective (RPO)	Project contribution
<p><i>RPO 46 Digital and Physical Infrastructure in Rural Areas; It is an objective to expedite the completion of infrastructure servicing diverse settlements to support innovation, enterprise start-ups and competitiveness. This includes high quality broadband and mobile communication services to all rural locations, water and wastewater facilities for the growth of settlements, sustainable energy supply, enhanced transport connectivity including rural public transport services and greenway walking and pedestrian corridors between settlements.</i></p>	<p>The Project, by producing renewable electricity in a rural area, provides a sustainable energy supply. The Project includes a Substation and Grid Connection which will become an asset of the national electricity network, upgrading the physical electricity infrastructure in the region. The distribution bays at the Substation have the potential to power local projects, such as the proposed park and ride facilities (including EV charging facilities) at Charleville and Bruree as part of the N/M20 project²⁹. By providing renewable electricity, the Project further boosts the positive environmental effect of an increase in electronic vehicle use, including those in rural public transport services. It also increases the stability of energy supply to meet the growing demand of increased electrification.</p>
<p><i>RPO 49 Innovation in Rural areas; It is an objective to support innovation, enterprise start-ups and competitiveness of our rural Region.</i></p>	<p>The Project is located in a rural area, it represents a significant investment into the locality in an innovative and sustainable industry and will create jobs.</p> <p>It will provide an improved renewable electricity supply county. This could attract new enterprise to the region, bringing jobs, economic growth and population increases. The introduction of renewable electricity helps to stabilise and reduce electricity costs,</p>

²⁹ <https://corklimerick.ie/june-2024-update/>

Regional Policy Objective (RPO)	Project contribution
	making Ireland a more attractive investment location. The increased renewable electricity supply will also help to meet increased demand to facilitate further economic growth.
<p><i>RPO 50 Diversification; It is an objective to further develop a diverse base of smart economic specialisms across our rural Region, including innovation and diversification in agriculture (agri-Tech, food and beverage), the marine (ports, fisheries and the wider blue economy potential), forestry, peatlands, renewable energy, tourism (leverage the opportunities from the Wild Atlantic Way, Ireland's Ancient East and Ireland's Hidden Heartlands brands), social enterprise, circular economy, knowledge economy, global business services, fin-tech, specialised engineering, heritage, arts and culture, design and craft industries as dynamic divers for our rural economy</i></p>	<p>The Project is a renewable energy project. The Site is located in agricultural lands, represents diversification for the farmers involved. The Project also provides the opportunity to reinforce the existing local renewable energy industry knowledge and skills base, providing stability and diversity to the rural economy that can drive further investment.</p>
<p><i>RPO 56 Low Carbon Economy;</i></p> <p><i>a. 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;</i></p> <p><i>b. It is an objective to develop enterprises that create and employ green technologies.</i></p> <p><i>c. Local authorities should ensure that the development of green industry and technologies incorporates careful consideration of potential environmental impacts at project level including the capacity of receiving</i></p>	<p>Renewable energy, wind energy in particular, is identified throughout this review as being required to play a vital role in mitigating climate change by transitioning to a low carbon economy and society. The Project will contribute to the regions electricity network by producing 54MW of renewable electricity.</p> <p>The Site location has been selected for its excellent wind resource and minimal environmental impacts; these</p>

Regional Policy Objective (RPO)	Project contribution
<p><i>environment and existing infrastructure to serve new industries.</i></p> <p><i>d. Local authorities shall include objectives in statutory land use plans to promote energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retro fitting of energy efficiency measures in the existing building stock, energy efficiency in traditional buildings and initiatives to achieve Nearly Zero-Energy Buildings (NZEB) standards in line with the Energy Performance of Buildings Directive (EPBD).</i></p> <p><i>e. It is an objective to support investments in energy efficiency of existing commercial and public building stock with a target of all public buildings and at least one-third of total commercial premises upgraded to BER Rating 'B'. Local authorities shall report annually on energy usage in all public buildings and will achieve a target of 33% improvement in energy efficiency in all buildings in accordance with the National Energy Efficiency Action Plan (NEEAP)</i></p>	<p>impacts have been assessed throughout this EIAR.</p> <p>By producing renewable energy for use in the region, the Project helps to contribute to lowering the carbon footprint of existing and new buildings.</p>
<p><i>RPO 96: Integrating Renewable Energy Sources; To support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate renewable energy sources and ensure our national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grows.</i></p>	<p>The Project produces renewable wind energy by harnessing the wind resource of the southern region and helping to meet the increased energy demand as the regional economy grows.</p> <p>The Project includes a Substation and Grid Connection which will become assets of the nation grid, upgrading the electricity infrastructure in the region.</p>
<p><i>RPO 99: Renewable Wind Energy; To support the sustainable development of</i></p>	<p>The Project is an excellent example of sustainable development (see section</p>

Regional Policy Objective (RPO)	Project contribution
<i>renewable wind energy (onshore and offshore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.</i>	4.8.4) it has been assessed under each of the topics contained in the EIAR and has been found to be in a suitable location. The Project is located in an area designated as 'Preferred' to wind farm development in the Limerick Development Plan. The Project has been designed in accordance with the current Wind Energy Development Guidelines 2006 and has had regard to the Draft Revised Wind Energy Development Guidelines (see section 4.7.1 and 4.7.2).
<i>RPO 100: Indigenous Renewable Energy Production and Grid Injection; To support the integration of indigenous renewable energy production and grid injection.</i>	The Project will provide up to 54MW of renewable, indigenously produced wind energy. This additional renewable power generated will contribute to a reduction in greenhouse gas emissions from fossil fuels, improve regional/national energy security and help Ireland achieve our renewable electricity targets.

The RSES recognises and aims to support the many opportunities for wind as a major source of renewable energy. It declares that opportunities for both commercial and community wind energy projects should be harnessed, having regard to the requirements of DoHPLG Guidelines on wind energy. It also states that wind energy technology has an important role in delivering value and clean electricity for Ireland.

4.6.2.2 Compliance with Regional Policy

As identified in **Table 4.2** above, the Project is in line with the regional policies as set out in the RSES. By producing renewable energy, in a suitable location, the Project contributes to policies associated with transitioning to a climate neutral economy, economic development and rural diversification. This contributes to positioning County Limerick as a leader in delivery of renewable electricity for the Southern Regional Assembly region. As a form of

sustainable energy, with an output potential of between 54MW of installed capacity, the Project will contribute significantly to renewable energy targets and the strategy supported in the RSES for the Southern Region.

4.6.3 Local Policy

4.6.3.1 The Limerick County Development Plan 2022-2028

The Limerick Development Plan (LDP) 2022 – 2028 (adopted on the 17th of June 2022) sets out the Council's overall strategy for the proper planning and sustainable development of County Limerick in accordance with the Planning and Development Act 2000 (as amended). The LDP states that:

“At the core of the vision are cohesive and sustainable communities, where our cultural, natural and built environment is protected. The vision embraces inclusiveness and a high quality of life for all, through healthy place-making and social justice, including the ongoing development of the Regeneration Areas and disadvantaged communities. An integrated approach will align housing and public transport provision. Human and environment wellbeing including climate adaptation are at the core of the vision.”

One of the CDP's key ambitions is to: *“develop as an environmentally sustainable and carbon neutral economy - a pioneer in sustainable growth. This will be underpinned by the promotion of active mobility for all, creating an attractive and distinctive place to live, work and visit.”*

The CDP supports the concept of generating renewable energy and acknowledges the significant contribution that wind energy can make as a clean sustainable solution to energy requirements and its vital role in helping achieve national targets in relation to fossil fuel reductions and consequently greenhouse gas emissions. A range of energy and renewable energy policies and objectives are identified throughout the CDP and included in these, relevant to the proposed Project, are the following:

Table 4.3: Relevant Policies from the Limerick Development Plan (LDP) 2022-2028 relevant to the Project

Objective/ Policy	Statement of Compliance
<u>Renewable Energy - Objectives & Policy</u>	
CAF P6: <i>It is a policy of the Council to support renewable energy commitments outlined in national and regional policy, by facilitating the development and exploitation</i>	The proposed Project is anticipated to have the capacity to generate between 54MW of renewable electricity through the indigenous wind resource, therefore contributing to national

Objective/ Policy	Statement of Compliance
<p><i>of a range of renewable energy sources at suitable locations throughout Limerick, where such development does not have a negative impact on the surrounding environment landscape, biodiversity, water quality or local amenities, to ensure the long-term sustainable growth of Limerick</i></p>	<p>and regional renewable energy policies. The LDP 2022-2028 includes renewable energy targets for 2030, including a 386.45MW target for wind. The current installed capacity of County Limerick stands at 243.35MW³⁰, leaving a short fall of 152.1MW to be achieved in the next 5 years. The Project would contribute circa 36% of this target for new onshore wind energy in Limerick and is in a 'Preferred' location for wind energy development.</p> <p>An Environmental Impact Assessment has been carried out on the following:</p> <ul style="list-style-type: none"> • Human Health and Population • Biodiversity • Aquatic Ecology • Ornithology • Geology • Hydrology • Noise • Landscape and Visual • Material Assets • Traffic and Transport • Shadow flicker <p>The EIAR has shown that where significant impacts on the environment are anticipated, mitigation measures will be put in place to ensure no negative impacts on the surrounding environment as a result of the Project.</p>
<p>CAF O27: <i>It is an objective of the Council to encourage and facilitate the production of energy from renewable sources, such as</i></p>	<p>The Project is a wind energy project which is anticipated to have the capacity to generate between 54MW of renewable electricity. An</p>

³⁰ <https://www.limerick.ie/sites/default/files/media/documents/2023-05/Limerick-Development-Plan-Volume-1-Written-Statement-including-Variation-No-1.pdf> Accessed 26/07/2024

Objective/ Policy	Statement of Compliance
<i>from bioenergy, solar, hydro, tidal, geothermal and wind energy, subject to appropriate levels of environmental assessment and planning considerations.</i>	application for consent, supported by this EIAR and NIS, will be submitted to the Commission which will ensure that the Project is subject to appropriate levels of environmental assessment and planning considerations during the consenting process
CAF O28: <i>It is an objective of the Council to encourage the development of wind energy, in accordance with Government policy and having regard to the principles and planning guidance set out in the Department of Housing, Planning and Local Government publications relating to Wind Energy Development and the DCCAE Code of Practice for Wind Energy Development in Ireland and any other relevant guidance, which may be issued in relation to sustainable energy provisions during the course of the Plan</i>	The Project is anticipated to have the capacity to generate between 54MW of renewable electricity through the indigenous wind resource. The proposed Project will be constructed, operated and decommissioned in line with Government policy and guidance and 'Wind Energy Development Guidelines' (2006) or any revisions thereof which may be issued during the lifetime of the Plan. Public consultation has been carried out in line with the DCCAE Code of Practice for Wind Energy Development, full details on public consultation can be found in Chapter 1: Introduction and Appendix 1.5: Community Engagement Report .
CAF O29: <i>It is an objective of the Council to facilitate the development of wind energy in an environmentally sustainable manner, ensuring proposals are consistent with the landscape character objectives of the Plan, the protection of the natural and built environment and the visual and residential amenities of the area.</i>	The Project falls within wind energy designation zone labelled ' Preferred ' in the Limerick Development Plan, the aim of the CDP is to encourage the placement of wind farms and related infrastructure in these preferred areas, which the Project complies with. From the assessment carried out in Chapter 12: Landscape and Visual , it is not considered that there will be any significant effects on landscape and visual amenity from the Project. Shadow flicker will comply with the 2006 Guidelines, with proposed mitigation measures, as shown in Chapter 14: Shadow Flicker .

Objective/ Policy	Statement of Compliance
	As shown in Chapter 11: Noise , the effects of noise from the operation of the Project have been assessed using 2006 Guidelines with the methodology described in ETSU-R-97 and the IOA Good Practice Guide. Noise levels during operation of the Project have been predicted using the best practice of calculation technique. They have been compared with the noise limits in the 2006 Guidelines and recent 2025 An Coimisiún Pleanála limits and found to be compliant.
<p>CAF O30: <i>It is an objective of the Council to promote the location of wind farms and wind energy infrastructure in the 'preferred areas' as outlined on Map 9.1, to prohibit such infrastructure in areas identified as 'not open for consideration' and to consider, subject to appropriate assessment, the location of wind generating infrastructure in areas 'open for consideration'.</i></p>	<p>The Project falls within wind energy designation zone labelled 'Preferred' in the Limerick Development Plan. According to CAF O30, the aim is to encourage the placement of wind farms and related infrastructure in preferred areas specified on Map 9.1 in the CDP, prohibit such development in designated "not open for consideration" and potentially consider, after appropriate assessment, installing wind energy infrastructure in areas marked as "open for consideration."</p>

4.6.3.2 The Cork County Development Plan 2022-2028

Although the project is located entirely within the administrative boundary of Limerick County Council, there is potential for visual effects to arise in County Cork given the proximity of the Wind Farm Site to Cork County border which is approximately 300m from the Site. For this reason, policies within the Cork County Council Development Plan related to landscapes and visual effects on surrounding areas have been taken into consideration as part of this EIAR.

The Cork County Development Plan 2022-2028 sets out the policies and objectives and the overall strategy for the development of the County over the plan period 2022-2028. The CDP states that:

“The Plan sets out an approach centred on the core principle of sustainability with a focus on creating vibrant, liveable, climate resilient communities.”

The policies from the Cork CDP that have the potential to be impacted by the Project, with particular relevance to landscape and visual impacts and archaeological landscape impacts have been taken into consideration in Table 4.4. Individual technical assessments included with the Environmental Impact Assessment Report will also refer to CDP policies where relevant.

Table 4.4: Relevant Policies from the Cork County Development Plan (CDP) 2022 - 2028 relevant to the Project

Objective/Policy	Statement of Compliance
GI 14-9: <i>(a) Protect the visual and scenic amenities of County Cork's built and natural environment.</i>	No significant visual impact is predicted in accordance with relevant and national legislation as detailed in the Landscape and Visual Impact Assessment. See EIAR Chapter 12: Landscape and Visual Amenity.
GI 14-10: <i>Ensure that the management of development throughout the County will have regard for the value of the landscape, its character, distinctiveness and sensitivity as recognised in the Cork County Draft Landscape Strategy and its recommendations, in order to minimize the visual and environmental impact of development, particularly in areas designated as High Value Landscapes where higher development standards (layout, design, landscaping, materials used) will be required.</i>	It is considered that there will not be any significant effects in respect of landscape and visual arising from the proposed Project individually or cumulatively. See EIAR Chapter 12: Landscape and Visual Amenity.
GI 14-12: <i>Preserve the character of all important views and prospects, particularly sea views, river or lake views, views of unspoilt mountains, upland or coastal landscapes, views of historical or cultural significance (including buildings and</i>	Based on a review of the Cork County Development Plan and the Draft Cork Landscape Strategy (2007), there is one scenic designation located within the 20km Study Area.

Objective/Policy	Statement of Compliance
<p><i>townscapes) and views of natural beauty as recognized in the Draft Landscape Strategy.</i></p>	<ul style="list-style-type: none"> S13 'Kilfinnane - Shanballymore Road' is located within the southeast periphery of the Study Area, described as 'Local Road from Craig Cross Roads to County Boundary Views of the Ballyhoura Mountains & the Awbeg Valley'. This scenic route is completely out of ZTV and therefore not deemed relevant to the Project. <p>See EIAR Chapter 12: Landscape and Visual Amenity.</p>
<p>GI 14-14: <i>Protect the character of those views and prospects obtainable from scenic routes and in particular stretches of scenic routes that have very special views and prospects identified in this Plan. The scenic routes identified in this Plan are shown on the scenic amenity maps in the CDP Map Browser and are listed in Volume 2 Heritage and Amenity Chapter 5 Scenic Routes of this Plan.</i></p>	<p>Within Co. Cork, there are no designated views and prospects within 20km of the Site. It is considered that there will not be any landscape, visual and cumulative assessment significant effects arising from the proposed Project. See EIAR Chapter 12: Landscape and Visual Amenity.</p>

4.6.3.3 Limerick Landscape Character Assessment

The Landscape Character Assessment for Co. Limerick was compiled as part of the LDP 2022-2028. This assessment was prepared in accordance with the Draft Guidelines for Landscape and Landscape Assessment (2000) as issued by the Department of Environment and Local Government, the aim of which is to:

- Heighten awareness of the importance of landscape in all aspects of physical planning.
- Provide guidance to planners and others, as how to deal with landscape considerations.
- Indicate specific requirements for development plans and for development controls.

The County Limerick Landscape Character is assessed in Chapter 6: Environment, Heritage, Landscape and Green Infrastructure of the LDP 2022-2028.

Map 6.1 of the Landscape Character Assessment shows that the site is contained in LCA01 - 'Agricultural Lowlands' Landscape Character Area, close to the Ballyhoura / Slieve Reagh LCA (c. 3km southeast). LCA 01 is described as:

"... the largest of the Landscape Character Areas in Limerick and comprises almost the entire central plain. This landscape is a farming landscape and is defined by a series of regular field boundaries, often allowed to grow to maturity. This well-developed hedgerow system is one of its main characteristics. In terms of topography, the landscape is generally rather flat with some locally prominent hills and ridges. The pastoral nature of the landscape is reinforced by the presence of farmyards".

There are specific objectives outlined for each Landscape Character Area in the Limerick CDP, the objectives for LCA 01 are as follows:

- a) Encourage, where housing is permitted, design that reflects existing housing stock, such as the two-story farmhouses which are a feature in the area.*
- b) Encourage retention of existing landscape features such as hedgerows and trees and their incorporation into landscaping for new developments.*
- c) Discourage development of locally prominent sites.*
- d) Encourage the regular arrangement of turbines with equal spacing in proposed wind farm developments, which take field boundaries into account.*
- e) Encourage development within existing settlements.*

The Site is not within a locally prominent site, with a low-lying, ostensibly flat landscape used primarily for agricultural farmland. The Project will result in the permanent loss of an estimated 1,008m of hedgerow to facilitate the construction of the wind farm infrastructure, including internal Access Tracks and access points from public roads. In addition, an additional 641m of hedging outside of the civil works will be removed for the purpose of providing bat buffers around turbines (where relevant) to minimise collision risk (see **Section 6.5.6.1**). The total loss of hedgerows is 1,679m. To mitigate against this loss the proposed measures are outlined below, with further details found in **Chapter 6: Biodiversity** and **Appendix 6.2: BEMP**.

- | | |
|--|---------------|
| • New hedge planting: | 1,620m |
| • Enhancement of existing hedging: | 1,359m |
| • Re-vitalisation of existing hedging: | 4,074m |
| • Total | 7,053m |

The Landscape and Visual Impact Assessment in **Chapter 12: Landscape and Visual Amenity** of the EIAR assessed the impact of the Project against designated views and prospects in County Limerick and the impact to the overall landscape in County Limerick based on the sensitivity of the adjoining area, as defined in the LDP 2022 - 2028.

4.6.3.4 Compliance with Local Policy

The Project will generate renewable energy, reducing Ireland's carbon footprint by displacing fossil fuels and contributing to climate policy mitigation objectives. The Project is compliant with local policy as it is supported by policies in the LDP 2022 - 2028 to increase and support renewable energy developments at a local level, while avoiding significant environmental or visual impacts. The LDP 2022-2028 includes renewable energy targets for 2030, including a 386.45MW target for wind. The current installed capacity of County Limerick stands at 243.35MW³¹, leaving a short fall of 152.1MW to be achieved in the next 5 years. The Project would contribute circa 36% of this target for new onshore wind energy in Limerick.

The Site is located in a "Preferred Area" for wind energy development (see Figure 4.2) in the LDP 2022-2028 and has been assessed under each of the topics contained in the EIAR and has been found to be in an appropriate location.

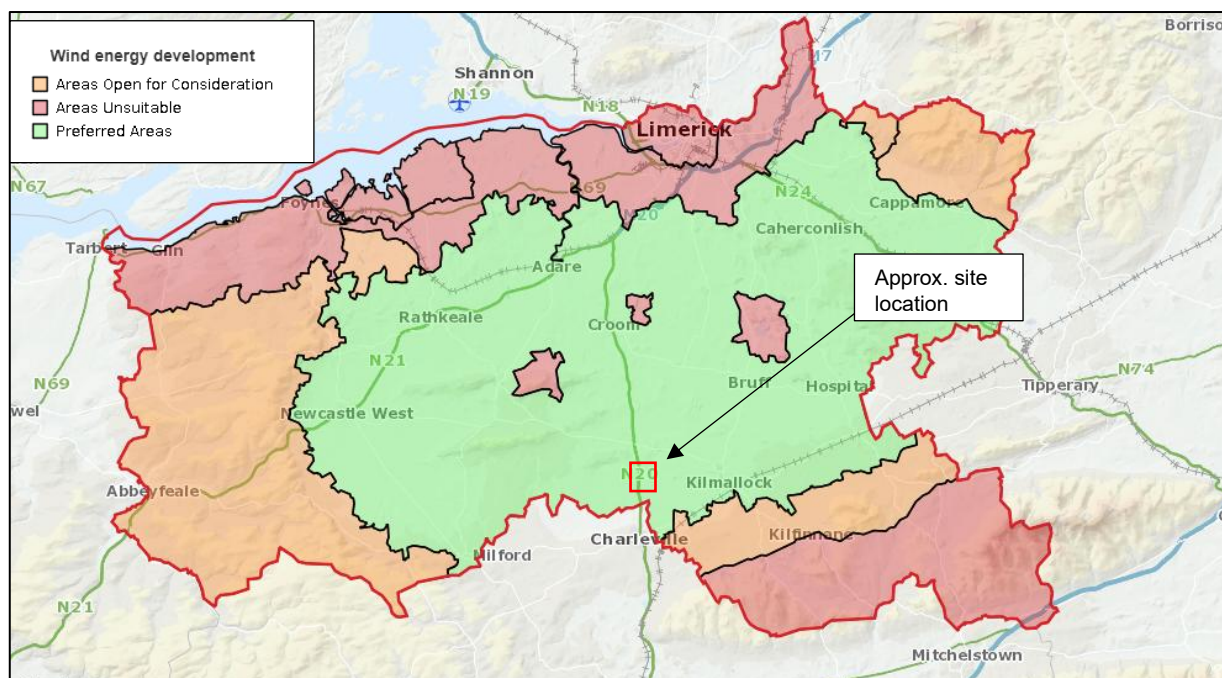


Figure 4.2 Limerick Development Plan 2022-2028 Chapter 9 (Map 9.1: Wind Energy Locations)

³¹ <https://www.limerick.ie/sites/default/files/media/documents/2023-05/Limerick-Development-Plan-Volume-1-Written-Statement-including-Variation-No-1.pdf> [Accessed 06/08/2025]

4.7 OTHER CORE PLANNING POLICY DOCUMENTS

4.7.1 The Wind Energy Development Guidelines (WEDGs), Guidelines for Planning Authorities, (DoHLG, 2006)

The Wind Energy Development Guidelines (DoHLG, 2006) advise that a reasonable balance must be achieved between meeting Government Policy on renewable energy and the proper planning and sustainable development of an area, and it provides advice in relation to the information that should be submitted with planning applications. The effects on residential amenity, the environment, nature conservation, birds and the landscape should be addressed. It states that particular landscapes of very high sensitivity may not be appropriate for wind energy development.

The Wind Energy Development Guidelines 2006 remain valid until the revised, Draft Wind Energy Guidelines 2019 are finalised and published by the government.

IWEA Best Practice Guidelines for the Irish Wind Energy Industry 2012

Wind Energy Ireland (WEI), formerly Irish Wind Energy Association (IWEA), published updated Wind Energy Best Practice Guidelines for the Irish Wind Industry in 2012. The guidelines aim to encourage and define best practice development in the wind energy industry, acting as a reference document and guide to the main issues relating to wind energy developments. The purpose of the guidelines is to encourage responsible and sensitive wind farm development, which takes into consideration the concerns of local communities, planners, and other interested groups. The guidelines outline the main aspects of wind energy development with emphasis on responsible and sustainable design and environmental practices, on aspects of development which affect external stakeholders, and on good community engagement practices. In approaching the development of IWEA's guidelines, the aim was to be complementary to the Department of the Environment Heritage and Local Government's '*Wind Energy Development Guidelines*' (2006). The Project has been designed in accordance with the 2012 IWEA Best Practice Guidelines.

4.7.2 The Draft Revised Wind Energy Development Guidelines (DoHLG, 2019)

The key aspects for the draft proposed new wind energy guidelines include the following:

- a visual amenity setback of 4 times the turbine height between a wind turbine and the nearest residential property, subject to a mandatory minimum distance of 500 metres.
- the elimination of shadow flicker.
- the application of a more stringent noise limit, consistent with World Health Organisation standards.

- the introduction of new obligations in relation to community engagement with local communities along with the provision of community benefit measures.

The Project has been designed in accordance with the current Wind Energy Development Guidelines 2006 and has had regard to the Draft Revised Wind Energy Development Guidelines in relation to:

- Noise impacts (assessed in **Chapter 11: Noise**) are in line with the 2006 guidelines.
- To avoid shadow flicker at nearby dwellings, assessment and mitigation measures have also been included in the Project, in line with the 2006 guidelines with regard to the draft 2019 guidelines, full details of this can be found in **Chapter 5: Population and Human Health** and **Chapter 14: Shadow Flicker**.
- Engagement with local communities has taken place throughout the design and planning phases of the proposed Project. Full details can be found in **Chapter 1: Introduction** and in the Community Report in **Appendix 1.5**.
- Community Benefit: Establishing a community fund of up to **€250,000** annually in the first 15 years of operation that will be administered by a management committee including local community representatives, in line with the Renewable Energy Support Scheme (RESS) Community Benefit Fund Good Practice Principles published in 2021³².

4.7.3 Renewable Energy Support Scheme (RESS)

The present Renewable Electricity Support Scheme (RESS) replaces the former Renewable Energy Feed-in Tariff (REFIT) support scheme. It is intended that the new Renewable Electricity Support Scheme will provide support to renewable electricity projects in Ireland. With a primary focus on cost effectiveness, the RESS will deliver a broader range of policy objectives, including those outlined in section 4.5.1.7.

RESS auctions will be held at frequent intervals throughout the lifetime of the scheme. The Scheme will provide for a renewable electricity (RES-E) ambition of up to a maximum of 55% by 2030, subject to determining the cost-effective level which will be set out in the draft National Energy and Climate Plan (NECP) 2020³³.

In terms of Communities, all projects looking for support under the new RESS will need to meet pre-qualification criteria including offering the community an opportunity to invest in and take ownership of a portion of renewable projects in their local area. A national register of community benefit payments will also be established.

³² Estimated €8,000 per mega watt installed for 35 year project lifespan

³³ <https://www.gov.ie/en/publication/0015c-irelands-national-energy-climate-plan-2021-2030/> [Accessed 06/08/2025]

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

Following on from the IWEA published Best Practice Guidelines in March 2012, the Association extended its guidance with the publication of this Best Practice in Community Engagement and Commitment. 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 these guidelines is to see that the views of local communities are taken into account at all stages of a development and that local communities can share in the benefits.

Community engagement was carried out in accordance with the 2013 IWEA Guidelines. Details of the community engagement and financial contributions undertaken by the developer are outlined in **Chapter 1: Introduction (Section 1.10.2)**.

4.7.5 Enduring Connection Policy Stage 2 (ECP-2)

The Irish energy regulator, the Commission for Regulation of Utilities (CRU), has introduced a new grid connection policy - Enduring Connection Policy (ECP). ECP-1 was the first stage of the CRU's development of enduring connection policy in Ireland. On the 27th March 2018 the CRU published their decision on ECP-1.

ECP-2 is the second stage of the CRU's development of enduring connection policy in Ireland. On the 10th of June 2020 the CRU published their decision on ECP-2, which set policy for at least three annual batches of connection offers (ECP 2.1, ECP-2.2, and ECP-2.3). Under ECP-2, grid connection applications are categorised as either Category A, Category B or Category C. The Project lies within Category A 'Generation, storage and other system services technology projects (MEC >0.5MW)'. The ECP application process aims to eliminate speculative applicants and allow viable projects to be delivered.

On 4th April 2023, the CRU published the ECP-2.4 decision (CRU202326), a policy update to ECP-2, to address the volume of grid connection applications in a way that promotes optimal use of the existing network considering the system needs, national policy, and consumer interest. This introduced amendments to ECP-2. These included a longer batch opening window, increased from one month to two months, a reduction in the connection

offers from 115 to 100. ESB Networks will contact applicants every 6 months following the connection assessment issuance to request an update from the applicant as to the status of the project and the planning permission application. It is expected that, as a result of the ECP system, project development / project finance risk will significantly diminish, reducing one of the key barriers for developers and financiers in the Irish market.

4.8 MATERIAL PLANNING CONSIDERATIONS

4.8.1 The National Interest and Strategic Importance

The Project will make a valuable contribution to climate change adaptation and greenhouse gas reductions as part of the international (Section 4.4) and European (Section 4.5) efforts to combat climate change.

Ireland is facing significant challenges in efforts to meet renewable energy and emissions targets and is falling behind in the longer-term movement away from fossil fuels. Ireland has one of the highest rates of importing fuel in Europe with energy import dependency increasing to 80% in 2021³⁴. Energy demand in Ireland has been growing and is expected to continue to increase, especially electricity demand which is expected to grow by 37% to 2031³⁵. Increases to the cost of carbon, supply issues and potential political insecurity increases fossil fuel price volatility. Since the Russian invasion of Ukraine, energy prices in Ireland have increased significantly. The SEAI's Electricity Prices in Ireland Report; January to June 2022³⁶, found on average residential electricity prices increased 10.4% in the 12 months prior to June 2022. The Economic and Social Research Institute (ESRI) report on Energy Poverty published in 2022³⁷, has also warned that as many as 43% of households could now be in energy poverty.

The high rate of imported fossil fuel dependency, the increasing demand for electricity and current energy price volatility make it vital to introduce more domestic renewable energy generation plants, such as the Project, to provide reliable, secure and affordable energy supplies in Ireland. The Project could improve Irish energy security and reduce reliance on imported fossil fuels in line with the National Energy Security Framework (4.6.3.2) and the REPowerEU Plan (Section 4.5.3).

³⁴ SEAI. (2022). ENERGY IN IRELAND. https://www.seai.ie/data-and-insights/seai-statistics/key-publications/energy-in-ireland/?qclid=EAlaIqobChMI-LH_o6r8_QIV09_tCh23YAykEAAAYASAAEqJipvD_BwE [Accessed 06/08/2025]

³⁵ EirGrid. (2022). EirGrid's Generation Capacity Statement Predicts Challenging Outlook for Ireland <https://www.eirgridgroup.com/newsroom/eirgrids-generation-capac/#:~:text=The%20GCS%2C%20in%20its%20median,relatively%20consistent%20across%20the%20decade>. Accessed 07/01/2024

³⁶ SEAI. (2022). <https://www.seai.ie/publications/SEAI-EPR-data-for-JAN-to-JUN-2022.pdf> Accessed 07/02/2024

³⁷ ESRI. (2022). Energy poverty at highest recorded rate <https://www.esri.ie/news/energy-poverty-at-highest-recorded-rate> Accessed 07/01/2024

The construction of the Project will also positively contribute to the regional economy bringing investment and jobs that will help to support and retain confidence in the key regional industries of construction and renewable energy.

4.8.2 The Economic Importance of The Development

The Project would represent a strategically significant investment in the locality of County Limerick and the wider southern region. The Project will provide a multi-million euro benefit to both the Irish and local economies and the opportunity to reinforce the existing local renewable energy industry knowledge and skills base, providing the stability and diversity to the rural economy that can stimulate further industry investment to take place. This will have a positive economic impact with several Irish firms commissioned to work on the design, environmental assessment and planning aspects of the Project. Local suppliers will be used wherever possible during the construction phase and in the operational stage, Irish businesses will benefit from the provision of a reliable, local renewable energy source.

4.8.3 The Proposed Project as Sustainable Development

Sustainable development is development which meets the needs of the present without compromising the ability of future generations to meet their own needs, as outlined in the Brundtland Report³⁸. There are three pillars to sustainable development which are economic, social and environmental. The Project an excellent example of sustainable development, enshrined in the National Planning Framework. The Project meets each of the three pillars of sustainable development as outlined in **Table 4.5**.

Table 4.5: How the proposed Project Interacts with the three pillars of sustainable development.

Economic Role	The Project would represent a strategically significant investment in the locality. The Project provides the opportunity to reinforce and grow the existing local renewable energy industry knowledge and skills base, providing the stability and diversity to the rural economy that can stimulate further development by attracting new business to the region due to the improved supply of electricity. The Project will have a positive economic impact with several Irish firms commissioned to work on the design, environmental assessment and planning with up to 60 jobs created as a result of the Project.
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³⁸ Our Common Purpose: Brundtland Report, 1987

Social Role	<p>The influence of the Project to the de-carbonisation of the Irish electricity network will contribute positively to issues of strategic social importance. It will assist in mitigating climate change and improve air quality while enhancing energy security, including helping to stabilise and reduce energy costs. The Project will also create jobs up to 60 direct and indirect jobs during the construction periods. The Project will also promote economic development and rural diversification. Garrane Green Energy Limited will set up a community benefit fund calculated in accordance with the RESS Terms and Conditions at €2 per MWh of electricity produced by the Project. This is to be made available to the local community for the duration of the RESS (15 years). Fund from the Project will be allocated to community groups in the area should the Project be granted planning and be successful under the Government's Renewable Electricity Support Scheme (RESS) support programme. Further details can be found in Chapter 1: Introduction and Appendix 1.5.</p>
Environmental Role	<p>Overall, the EIAR sets out that the environmental effects arising from the Project can be satisfactorily mitigated. The findings demonstrate that the environment can accommodate the Project without giving rise to significant environmental effects in line with the LDP 2022 - 2028 objectives as well as regional, national and international policy. The NIS concludes that the proposed Project, either alone or in combination with other plans and projects, would not adversely affect the integrity of European sites, in view of the sites' conservation objectives and there is no reasonable scientific doubt as to the absence of such effects.</p> <p>Over its' lifespan (35 years), the Project would displace 1,634,117 tonnes of CO₂. This would help to mitigate climate change and the impacts to ecosystem globally.</p>

The 2030 Agenda for sustainable development, adopted by all United Nations Member States in 2015, provides a shared blueprint for peace and prosperity for people and the planet, now and into the future. At its heart are the 17 Sustainable Development Goals (SDGs), which are an urgent call for action by all countries - developed and developing - in a global partnership. The UN SDGs are the blueprint to achieve a better and more sustainable future for all. They address the global challenges we face, including poverty, inequality, climate change, environmental degradation, peace and justice.

The Project positively contributes to the following UN SDGs:



By producing renewable energy, the Project contributes to the displacement of fossil fuels, which pollute the air, this improves air quality, which is closely linked to good health and well-being. See **Chapter 12: Air and Climate** for details.



The Project would produce a renewable energy source locally, this improves Ireland's energy security and helps to stabilize and reduce energy costs for households and businesses.



The Project is a renewable energy enterprise, representing a multi-million-euro investment into the Southern Region. This could attract new enterprise to the county, bringing jobs and economic growth. This is examined in more detail in **Chapter 5: Population and Human Health**.



The Project by producing renewable energy contributes to decarbonising industry sectors through electrification. The Substation and Grid Connection will become assets of the national electricity grid under the management of EirGrid and assist in improving energy infrastructure in the region.



The renewable energy that the Project will generate will help support Ireland's climate neutral transition and reduce anthropogenic greenhouse gases. The proposed Project could provide power for to up to **30,000** homes with renewable energy.



By generating renewable energy and displacing fossil fuels the Project helps to reduce carbon emissions and other greenhouse gases and mitigate climate change, supporting Ireland's transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050.

4.9 CONCLUSIONS

Throughout this Planning Policy Chapter, renewable energy has been identified as being required to play an essential role in mitigating climate change by transitioning to a carbon neutral economy and society. By investing in renewable energy, Ireland can promote sustainable economic development using its own, secure and clean energy.

All planning applications have to be determined on their individual merits with due consideration given to the overall planning balance of a scheme. While many development proposals will encompass both positive and negative aspects that require consideration, planning weight should air on the side of a 'presumption in favour of development unless material considerations indicate otherwise' as per the paragraph 11 of National Planning Framework. The pressing need to address climate change, and the presumption of overriding public interest being given to renewable energy projects, makes giving additional renewable energy projects, such as the Project this '*presumption in favour of development unless material considerations indicate otherwise*' more important.

Furthermore, pursuant to section 15 of the Climate Act, the Commission is obliged, in so far as is practicable to perform its function in a manner consistent with CAP 2025, the National Energy & Climate Plan 2021 – 2030 and other listed national climate mitigation and adaptation plans. The recent High Court decision in the *Coolglass* case confirmed the imperative nature of the obligation placed on public bodies to exercise their discretionary powers in "*such a way as to support the outcome favouring climate goals*"³⁹ unless precluded by a "*mandatory and non-fixable legal requirement*" (which it is submitted is not the case here).

The Garrane Green Energy Project in County Limerick will provide 54MW of renewable, domestically produced wind energy. This additional renewable power generated will contribute to a reduction in greenhouse gas emissions from fossil fuels, improve regional/national energy security and help Ireland achieve our renewable electricity targets.

³⁹ Coolglass Wind Farm Limited v An Bord Pleanála [2025] IEHC 1 at para. 131

The Project contributes to supplying the national demand for renewable energy, which in the context of the ongoing climate emergency and increasing demand is an urgent Irish national priority.

While renewable energy in Ireland has come a long way, there is still a shortfall in where the nation needs to be to achieve increasing targets. Ireland missed its 2020 target for renewable energy achieving 12% instead of 16% of overall renewable energy share. There is a clear national mandate to accommodate significant onshore wind within the next decade with The Climate Action Plan 2024 and 2025 setting a 9GW target for installed wind energy capacity by 2030. In December 2024 this was 4.8GW in the Republic of Ireland, leaving a shortfall of 4.2GW to be achieved over the next 5 years.

Further, the National Planning Framework emphasises a move to a carbon neutral economy, reducing Ireland's carbon footprint and integrating climate action into the planning system. The Regional Spatial and Economic Strategy (RSES) for the Southern Region supports opportunities for onshore wind as a major source of renewable energy with an important role in delivering value and clean electricity for Ireland. The Limerick Development Plan 2022 - 2028 reinforces the national and regional energy policies. The Project falls in an area classed as '*Preferred Area*' to wind farm development in the Renewable Energy Strategy for Co. Limerick.

The Project meets the definition of sustainable development as defined by the National Planning Framework in terms of the three sustainability pillars: Economy, Environment and Social. It also contributes to the UN sustainability goals; 3 Good Health and Wellbeing, 7 Affordable and Clean Energy, 8 Decent Work and Economic Growth, 9 Industry Innovation and Infrastructure, 11 Sustainable Cities and Communities and 13 Climate Action.

The Project process adopted by the Developer has represented a best practice approach to a renewable energy scheme design, minimising the potential impact through multiple design iterations and modifications to minimise the impact on the receiving environment, as shown in **Chapter 3: Alternatives Considered**. This ensures compliance with the suite of planning policies and objectives of the LDP 2022 - 2028. The layout of the Project presented in the Planning Application and EIAR represents the optimum fit with the technical and environmental parameters of this Project.

Environmental Impacts have been considered within this EIAR and through the process of assessment, embedded mitigation, and additional proposed mitigation outlined in the EIAR,

NIS, CEMP and Biodiversity Enhancement and Management Plan it has been shown that the Project can be constructed and operated and decommissioned without likely significant effects arising, demonstrating the acceptability of the proposal.

This chapter outlines how the Project is compliant with International, European and National policy on energy security, emissions reductions and renewable energy production. It has reviewed policy for the Southern region and local County Limerick policies and finds the Project complies with key renewable energy and environmental policy objectives.

The Project is aligned to all the relevant planning policies identified throughout this chapter, and it will contribute to achieving renewable energy and reduction in emissions targets locally, regionally and nationally as outlined in section 4.6 of this chapter.