FEHILY TIMONEY

DESIGNING AND DELIVERING A SUSTAINABLE FUTURE

ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR) FOR THE PROPOSED SHANCLOON WIND FARM, CO. GALWAY

VOLUME 2 – MAIN EIAR

CHAPTER 4 - POLICY

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4. POLICY AND PLANNING

4.1 Introduction

This Chapter of the EIAR outlines current International, National, Regional and Local policy (where relevant) in combination with legislation relating to the Project at Shancloon, County Galway.

The Irish Planning Policy system is set within a hierarchical structure, as identified in Image 4-1, below. EU Directives, Planning Legislation, Ministerial Guidelines, Government Policy and Capital programmes inform national policy.

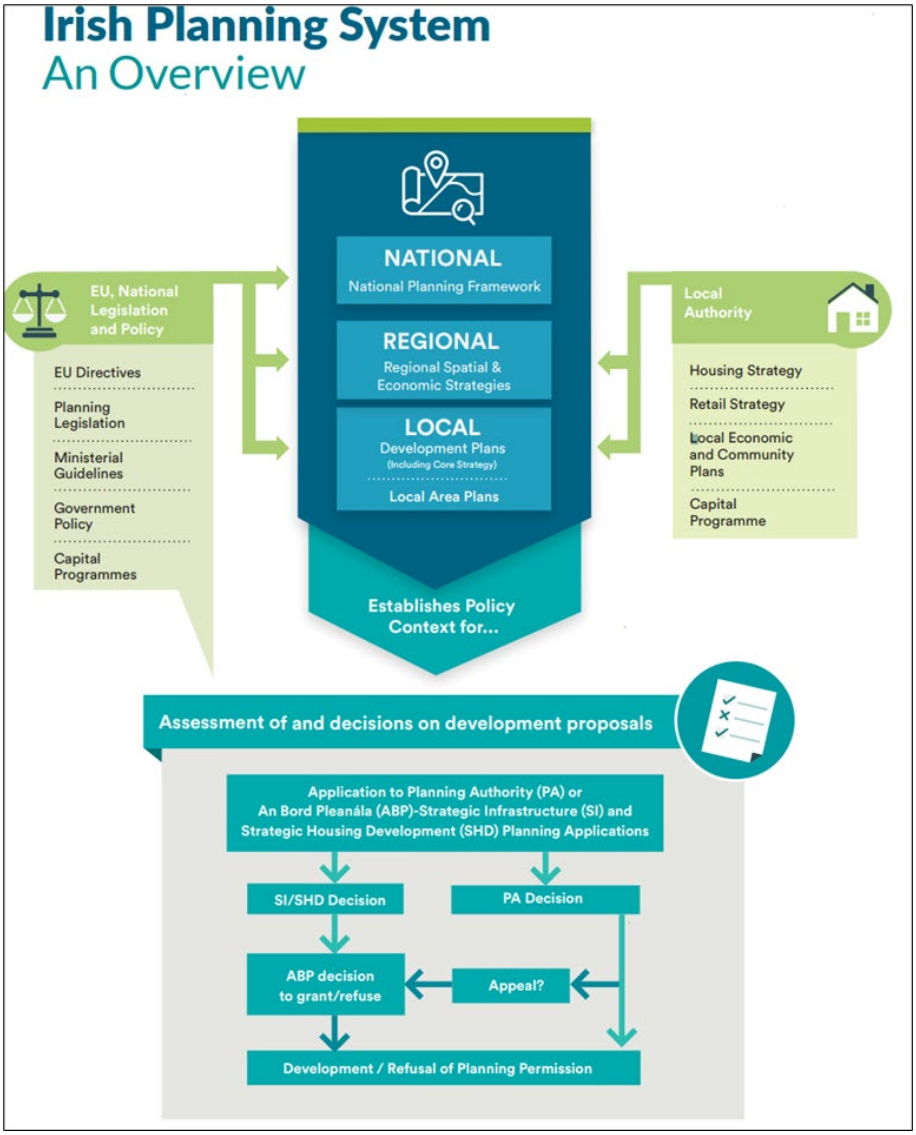

Image 4-1: Irish Planning System – An Overview

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

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

4.1.1 EIAR Policy Chapter Authors

This EIAR Chapter 4 – Policy has been prepared by Anthony Ryan and Jim Hughes of Fehily Timoney and Company. Anthony Ryan is a Project Planner with a Masters in Planning and Sustainable Development (MPlan) from University College Cork. Anthony has prepared several EIAR Policy Chapters for wind farm developments throughout Ireland.

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4.2 International Global Policies

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

The *Conference of the Parties* (COP) is the highest body of the UNFCCC and consists of environment ministers who have met annually since 1995 to assess progress in dealing with the issue of climate change. At COP 29, held in Dubai in the United Arab Emirates from November 30th to December 13th 2023, countries reaffirmed the previous COP goals and the Paris Agreement goals of limiting the increase in the global average temperature to well below 2°C above pre-industrial levels, and pursuing efforts to limit it to 1.5 °C. and recognised that the impacts of climate change will be much lower at a temperature increase of 1.5 °C compared with 2 °C. Furthermore, countries stressed the urgency of action "*in this critical decade*" when carbon dioxide emissions must be reduced by 45 per cent to reach net zero around the middle of this century.

The *International Panel on Climate Change* (IPCC) has put forward its clear assessment that the window for action on climate change is rapidly closing, and that renewable energy sources such as wind will have to grow from 30% of global electricity at present, to 80% by 2050 if we are to limit global warming to well below 2°C above pre-industrial levels in accordance with previous COP agreements. COP 29 gave a renewed emphasis on climate action and the increasing viability and role of renewables such as wind energy to provide a more sustainable future. This was emphasised by a key outcome of COP28 which was the "*Global Renewables and Energy Efficiency Pledge*". Otherwise referred to as the '*Global Renewables And Energy Efficiency Pledge*', this pledge aims to triple global renewable energy capacity by 2030, reaching at least 11,000 GW, with wind energy expected to be a major contributor to achieving this target.

The wind energy sector, represented by organizations like the *Global Wind Energy Council* (GWEC), actively participated in COP29, where they highlighted the advantages of wind power as a viable and sustainable means of reducing reliance on fossil fuels, boosting energy security, and creating jobs. Former Environment Minister Alan Kelly remarked as far back as 2015 that "*As a nation, we must do everything in our power to curb our emissions*". In this regard, the Government enacted the *Climate Action and Low Carbon Development Act* 2015 and the *Climate Action and Low Carbon Development (Amendment) Act* 2021 which provides for the approval of plans by the Government in relation to climate change for the purpose of pursuing the transition to a low carbon, climate resilient and environmentally sustainable economy.

4.2.2 Kyoto Protocol and the Doha Amendment to the Kyoto Protocol

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

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

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

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

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

4.3 European Union Legislation and Policy

This section details the latest policies and targets for renewable energy and greenhouse gas (GHG) emissions in Europe with a view to 2030 and beyond. The various directives and policies of the EU set a clear mandate for each member state to transition to sustainable, renewable energy and reduce greenhouse gas emissions.

4.3.1 Renewable Energy Directives (RED II to RED III)

The EU Directive (2018/2001) on the '*Promotion of the use of Energy from Renewable Sources*' , the so-called *RED Directive*, includes a binding renewable energy target of 32% for the European Union for 2030. The Directive, known as the *Renewable Energy Directive II* (RED II), was adopted on 11 December 2018, and its aim was to provide guiding principles on financial support schemes for RED, renewable energy self-consumption, energy communities and district heating. As part of RED II, Ireland's overall national target for the share of renewable energy sources (RED-E), forms the backbone of Ireland's strategy to achieve the overall renewable energy target for 2030.

Following on from RED II, the EU adopted '*Directive (EU) 2023/2413*', known as *Renewable Energy Directive III* (RED III) on 20th November 2023, with an aim to further increase its renewable energy ambitions. RED III replaces RED II and is in line with the '*European Green Deal* (2019), described in 4.3.4 below, and sets a new binding target of c. 42.5% renewable energy in the EU's total energy consumption by 2030, with an aspirational target of 45%. The aim of RED III is to introduce sector-specific targets for transport, heating, cooling, and industry to ensure a balanced contribution from all parts of the economy, and also included measures to streamline and accelerate the permitting process for renewable energy projects, addressing one of the major bottlenecks in the deployment of renewables. The transition from RED II to RED III reflects the EU's commitment to achieving higher renewable energy targets and facilitating clean energy.

4.3.2 Clean Energy for all Europeans Package (2019)

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

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

4.3.3 European Green Deal (December 2019)

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

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

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

4.3.4 European Climate Law (July 2021)

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

The Commission recommended reducing the EU's net greenhouse gas emissions by 90% by 2040, relative to 1990. This 2040 climate target will reaffirm the EU's determination to tackle climate change, and will shape the EU's path after 2030, to ensure the EU reaches climate neutrality by 2050. The climate neutrality objective is at the heart of the European Green Deal (Section 4.3.3, above), and is a legally binding objective set out in the European Climate Law.

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

- 90% Reduction in Net Greenhouse Gas Emissions: Achieve a 90% reduction in net greenhouse gas emissions by 2040 compared to 1990 levels;
- Implementation of Existing Laws: Fully implement existing EU laws to reduce emissions by at least 55% by 2030;
- Decarbonisation of Industry: Focus on decarbonising industry by leveraging strengths in wind power, hydropower, and electrolysers, and investing in technologies for carbon capture, storage, and reuse;
- Boosting Domestic Manufacturing: Increase domestic manufacturing in growth sectors such as batteries, electric vehicles, heat pumps, and solar cells;
- Fairness and Solidarity: Ensure fairness and solidarity by supporting vulnerable citizens, regions, businesses, and workers through tools like the Social Climate Fund and Just Transition Fund;
- Open Dialogue: Maintain an open dialogue with all stakeholders, including farmers, businesses, social partners, and citizens.

4.3.5 RePower EU Plan

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

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

The RePower EU Plan states:

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

The RePower EU Plan specifically requires that Member States should speed up the green transition and spur massive investment in renewable energy. We will need to enable industry and transport to substitute fossil fuels faster to bring down emissions and dependencies.

4.3.6 Council Regulation 2022/2577 as amended by Regulation Council Regulation (EU) 2024/223

The temporary measures for speeding up the permitting of renewable energy projects (including the rebuttable presumption in favour that renewable energy projects are of overriding public interest and serve public health and safety for the purposes of specific derogations) have been extended to June 2025 by Regulation 2024/223. The key components of this are as follows:

- Streamlined Permitting: The regulation aims to reduce administrative burdens and accelerate the permitting process for renewable energy projects.
- Environmental Assessment Exemptions: Under certain conditions, Member States can exempt renewable energy projects from specific environmental assessment requirements.
- Grid Connection Prioritization: The regulation prioritizes grid connection for renewable energy projects.

4.3.7 Commission Recommendation and Guidance to Member States (EU) 20224/1343 of 13 May 2024 on speeding up permit granting procedure for renewable energy and related infrastructure projects

The Commission Recommendation and Guidance to Member States (EU) 20224/1343 of 13 May 2024 is a document which intends to speed up the permit granting procedure for renewable energy and related infrastructure projects in the European Union. The document provides a number of recommendations and guidance on how to streamline the permitting process, which include some of the following:

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

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

Project Response:

In response to European Union Directives and Policy, the increased target in the *Renewable Energy Directive* and change of wording to "*over riding public interest*" (European Commission (2021), underlines the vital nature of investments into new renewable energy developments such as the Shancloon Wind Farm, which would increase the domestic renewable energy production capacity of Ireland and its contribution to the EU overall target.

As outlined in '*Council Regulation 2022/2577 as amended by Regulation Council Regulation (EU) 2024/223)*', the temporary measures for speeding up the permitting of renewable energy projects (including the rebuttable presumption in favour that renewable energy projects are of overriding public interest and serve public health and safety for the purposes of specific derogations) have been extended to June 2025 by *Regulation 2024/223*.

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

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

4.4 National Policies and Legislation

National energy and climate policies are informed by the overarching European policies which aims to unify the European Union in energy and climate goals. The following section sets out the relevant national policies which will influence the Project. These policies are supported by the latest Programme for Government (2020) '*Our Shared Future*' which presents strong climate governance in rapidly reducing climate change in order to protect and improve public health and quality of life. The government are committed to rapid decarbonisation of the energy sector with an aim of providing the necessary actions to deliver national renewable electricity targets. These government ambitions support the ongoing generation of renewable energy from onshore wind sources, as detailed in the following section.

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

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

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

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

Project Response:

The Project adheres to the White Paper's strategy to "*accelerate the development and diversification of renewable energy generation*" through onshore wind generation which will continue to be a mainstay in renewable energy generation.

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

First published in January 2016, *The Climate Action and Low Carbon Development (Amendment) Act 2021*, is an amendment to the Climate Action and Low Carbon Development Act 2015 and was signed into law on the 23rd July 2021. The *Climate Action and Low Carbon Development Act 2015* was amended by the *Climate Action and Low Carbon Development (Amendment) Act 2021*, and establishes a framework with clear, legally binding targets and commitments, and ensures the necessary structures and processes are embedded on a statutory basis to achieve our national, EU and international climate goals and obligations in the near and long term.

The Act includes the following key elements, such as:

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

Project Response:

The Climate Action and Low Carbon Development (Amendment) Act 2021 establishes a framework with clear, legally binding targets and commitments, and ensures the necessary structures and processes are embedded on a statutory basis to achieve our national, EU and international climate goals and obligations in the near and long term. As such, the Project at Shancloon aligns with the overall objective of the *Climate Action and Low Carbon Development (Amendment) Act 2021* to achieve a transition to a climate neutral economy by 2050, and supports the targets set out in the Climate Action Plan's made under the Climate Action and Low Carbon Development (Amendment) Act 2021.

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

Last updated on 30th July 2024, Ireland's updated integrated National Energy and Climate Plans 2021-2030 (NECP's) are the framework within which European Union Member States must plan their climate and energy objectives, targets, policies, and measures to the European Commission.

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

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

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

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

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

Within NECP, relevant renewable energy objectives include:

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

Project Response:

The Project aligns with the goals contained within the updated integrated National Energy and Climate Plan (NECP) 2021-2030. The Project will generate renewable energy through wind which will in turn displace thousands of tonnes of carbon dioxide over the lifetime of the wind farm. Furthermore, the Project will also enhance Ireland's energy security and contribute to Ireland meet its challenging climate change and decarbonisation targets as set out within the NECP.

This will require the implementation of energy security objectives such as support efforts to increase indigenous renewable sources in the energy mix, including wind, solar and bioenergy, and to facilitate infrastructure projects, including private sector commercial projects, which enhance Ireland's security of supply and are in keeping with Ireland's overall climate and energy objectives. The Project at Shancloon Wind Farm will also provide economic benefits to the local community, including employment opportunities during construction and operation, and contributions to a Community Benefit Fund which also aligns with the NECP's stated objectives of promoting sustainable development and regional economic growth.

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

Published in October 2021, The National Development Plan 2021-2030 (NDP) sets out the Government's over-arching investment strategy and budget for the period 2021-2030. The National Planning Framework (NPF) sets out the Government's high level strategic plan for shaping Ireland's growth and development to 2040. The Revised National Planning Framework (RNPF) has now been formally approved by both Houses of the Oireachtas (8th April), with the Revised NPF 2025 document published on 30th April 2025.

The revised framework acknowledges that Ireland needs to make up for lost ground in relation to carbon reduction targets and move towards the objective of achieving climate neutrality by 2050 and places a stronger emphasis on 'carbon neutrality' through the new and revised policies and objectives.

There is increased emphasis on the importance of renewable energy schemes in the RNPF and the infrastructure needed to support this, with new sections of the framework specifically focusing on 'Renewable Electricity'. Chapter 9 of the RNPF acknowledges that the "accelerated delivery of additional renewable energy generation is…essential for Ireland to meet its climate targets." A number of new and amended National Policy Objectives (NPOs) have been included to align with RED III, REPowerEU Plan, Ireland's Climate Action Plan (2024 & 2025) – NPO 70, NPO 71 & NPO 72, with NPO 73 supporting co-location of renewable technologies with other supporting technologies and complementary land uses.

The NPF (2018) provided broad support for renewables, however it lacked specific renewable energy targets. NPO 74 & NPO 75 now sets 'Regional Renewable Energy Capacity Allocations' for Onshore Wind and Solar. These targets require each region to strategically plan for sufficient wind and solar energy developments in order to achieve the overall national target of 9GW onshore wind by 2030. Crucially, for the Proposed Development located in the Northern and Western Region, that Power Capacity Allocation is 1,389 MW.

As a strategic development framework, Project Ireland 2040: The NPF demonstrates an approach that joins up ambition for improvement across the different areas of Irish life, bringing the various government departments, agencies, state owned enterprises and local authorities together behind a shared set of strategic objectives for rural, regional and urban development. This is shown in NPF, Chapter 9, which states:

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

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

a) *"an aggregate reduction in carbon dioxide (CO2) emissions of at least 80% (compared to 1990 levels) by 2050 across the electricity generation, built environment and transport sectors; and*

b) *in parallel, an approach to carbon neutrality in the agriculture and land-use sector, including forestry. which does not compromise capacity for sustainable food production."*

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

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

The NDP further outlines a number of key energy initiatives know as National Policy Objective's (NPO's), which outline a pathway to diversify our energy resources, and to assist in the transition towards a decarbonised society, with the most relevant to this Project being National Policy Objective 54 and 55, described below in Table 4-1.

Table 4-1: National Planning Framework: National Policy Objective's (NPO's)

National Policy Objective	Description
NPO 23	*"Facilitate the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture, energy and extractive industries, the bio- economy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism".*
NPO 54	*"Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions."*
NPO 55	"Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050."

Project Response:

The Project aligns with the *National Policy Objectives* (NPO) set out within the NPF, as shown in Table 4-1, above. NPO 23 aligns with the Project as the location of the Project has been assessed as having suitable wind resources which facilitate the development of the rural economy through supporting a sustainable and economically efficient energy industry while maintaining and protecting the natural landscape and built heritage, which are vital to rural tourism in the West of Ireland.

Also, NPO 54 has been fulfilled by the establishment of national, regional and local policy to facilitate renewables. By demonstrating accordance with these policies, the Project will therefore contribute to the achievement of the National Policy Objective.

Finally, NPO 55 has been met as the location of the Project has been assessed as having suitable wind resources in line with NPO 55. The Project has been assessed against each of the topics contained in the EIAR and adverse residual environmental impacts are avoided .

The renewable energy generated by the Project will significantly contribute towards increasing renewable energy as a long term and sustainable alternative to fossil fuel and contribute to Ireland transitioning to a low-carbon economy.

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

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

The CAP provides a framework for delivering the Government's target of a 51% reduction (relative to 2018) in greenhouse gas (GHG) emissions by 2030. CAP24 follows the *Climate Action and Low Carbon Development (Amendment) Act* 2021, which commits Ireland to a legally binding target of net zero greenhouse gas emissions no later than 2050, and a reduction of 51% by 2030. The Act provides a governance framework for annual revisions of the Climate Action Plan and the development of a National Long-Term Climate Action Strategy at least once every ten years. As part of this plan, the Government is also committed to reducing emissions by an average 7% per annum by 2030. The CAP24 is underpinned by a series of sectoral emissions reduction ambitions and enabling actions, with a selection of relevant actions that are relevant to the Project, as outlined below.

CAP24 sets out an objective to more than double Ireland's onshore wind energy capacity to 9 GW by 2030 in order to meet new renewable energy targets and reduce emissions.

Key actions of relevance to the Project include:

- *The electricity system must achieve a 75% reduction in CO2, reaching 3MtCO2eq in the final year of 2026 - 2030 carbon budget period.*
- *Deliver up to 9 GW onshore wind (with 6GW by 2025) by 2030.*
- *Complete a revised version of Shaping our Electricity Future to define required new grid construction and reinforcements to achieve sectoral ceilings and carbon budgets.*
- *As an urgent priority, establish the investment framework and competitive market, arrangements needed to deliver zero carbon system services.*
- *Align the relevant constituent elements of the planning and permitting system to support accelerated renewable energy development and ensure renewables will be considered to be in the overriding public interest.*
- *Action EL/23/1: Establish a taskforce to accelerate renewables.*
- *Action EL/23/2: Publish the Renewable Electricity Spatial Policy Framework*
- *Action EL/23/3: Publish a roadmap for the development and implementation of Regional Renewable Electricity Strategies*

- *Action EL/23/4: Prepare new draft Wind Energy Development Guidelines for onshore renewables.*
- *Action EL/23/5: Complete analysis to update Shaping Our Electricity Future to accommodate 80% renewables and align with carbon budgets and sectoral emissions ceilings for electricity.*
- *Action EL/23/6: Ensure electricity generation grid connection policies and regular rounds of connection offers which facilitate timely connecting of renewables, provides a locational signal and supports flexible technologies.*
- *Action EL/23/7: Publish an annual report setting out identifiable public benefits delivered by renewable energy sector including employment and skills/ training metrics, local investment and community benefits.*
- *Action EL/23/10: Deliver onshore and offshore RESS auctions as per the annual RESS auction calendar.*
- *Action EL/23/21: Carry out further studies to identify the investments and upgrades needed to facilitate 80% renewable electricity annual share.*

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

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

The Proposed Development will form an integral part of completing many of these actions set out in the CAP.

Project Response:

The policies and objectives of the Climate Action Plan 2024 and 2025 (CAP 24 and CAP25) are not directly reflected in the National Energy & Climate Plan (NECP) 2021-2030. The NECP was submitted in December 2023, therefore reflect the policies and objectives of the previous Climate Action Plan 2023 (CAP 23), along with Ireland's existing emissions reduction commitments. CAP 24 sets a target of increasing onshore wind capacity to 6 GW by 2025 and 9 GW by 2030.

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

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

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

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

In relation to sectoral emissions ceilings, the energy production from the Project is estimated to be between 61.6 MW to 72.6 MW. If we conservatively assume a capacity factor of 35% and the fraction of output to back up is 1.93% (i.e. 5% of capacity factor) and use an average of the estimated MW of the Project (67.1 MW), it would be expected the Project will result in a reduction in annual emissions in the electricity sector of c. 94.2 tonnes of CO2 per annum.

The 2023 and 2024 Climate Action Plan's established a target of 6GW of installed onshore wind capacity by 2025 and 9GW by 2030, with c. 4.6MW's of installed onshore wind capacity currently in the Republic of Ireland. This leaves a gap of c. 4,400MW's to achieve the 2030 target. As such, the Project has the potential to contribute c. 1.1% of the total additional onshore wind capacity required nationally.

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

4.4.6 Eirgrid Assessment of Progress with Carbon Budget Compliance

Emissions analysis completed by Eirgrid[1] in support of our 2023 Climate Action Plan indicates that in a best case / optimistic case scenario Ireland will have utilised 59.8Mt of our 60Mt CO2 equivalent emissions budget by the end of 2029, leaving a budget of only 0.2Mt for 2030. However, in their central case scenario they are predicting that Ireland is currently on track to substantially overshoot this emissions target with emissions across the decade projected to reach 79.5Mt. This would represent a 32.5% exceedance of our legally binding limits. This central case assessment is underpinned by assumptions in relation to the installed capacity of renewables set out in Table 4.2, below.

Table 4-2: EirGrid central case installed capacity assumptions resulting in a 32.5% exceedance of our sectoral emissions ceilings

Plant	Unit	2022	2023	2024	2025	2026	2027	2028	2029	2030
Onshore Wind	MW	4717	5046	5531	5800	6100	6400	6700	7000	7000
Solar PV	MW	462	1121	1870	2569	3155	3741	4327	4914	5500
Offshore Wind	MW	25	25	25	25	25	25	725	2865	5000

It is also worth noting that:

- This scenario is one which sees Ireland falling short on its 9000MW installed capacity target for onshore wind and is non-compliant with our carbon budget and sectoral emissions ceilings.
- Data for RESS 4 is pending following the most recent auction, therefore, the latest RESS data is from RESS 3 (Sept 2023), which showed Ireland has yet to reach the onshore wind installed capacity specified in this non-compliant scenario for 2022.
- The volumes clearing the RESS 3 auction fell well short of the volumes originally targeted for this auction and would not appear to be sufficient to align with even this non-compliant scenario – in other words, developments since that Eirgrid analysis was conducted are supportive of a conclusion that even the non-compliant central case scenario is out of reach.

4.4.7 Climate Change Advisory Council (CCAC) Assessment

In its 2023 Annual Review, published on 25th July 2023, the CCAC concluded that, at the current rate of policy implementation, Ireland will not meet the targets set in the first and second carbon budget periods unless urgent action is taken immediately, and emissions begin to fall much more rapidly .

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

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

The report notes that despite the stark outlook, increased renewable energy generation, from wind and solar, if delivered as planned, can reduce Energy Industry emissions by 60 per cent and achieve over 80 per cent renewable electricity generation by 2030.

4.4.8 National Onshore Wind Targets – State of play

National onshore wind targets are shown below in a database of projects at various stages of development prepared from sources including ESB Networks and EirGrid documents and publicly available information on the County Council Planning Portals/An Bord Pleanála.

At the time of the latest update in August 2023, the database indicated that the onshore wind pipeline in Ireland could be summarised as shown in Table 4-3, below:

Table 4-3: Summary of onshore wind development projects at specific stages in the development process

Project Phase / Category	MW's
Energised	4,353
With planning permission and grid access	2,431
With planning permission and queued for grid access	41
In planning process	1735
Energised but will be 25 years or older in 2030	-157.5

If we take reasonably optimistic assumptions in relation to the various projects noted above we would optimistically estimate that all currently known projects will deliver 6,974MW out of a total target of 9,000MW by 2030. This conclusion is an approximate one and applies an appropriate attrition factor which includes projects which may be delayed or cancelled due to failure to obtain planning permission, lack of funding or financial viability, technical challenges related to site suitability or grid connection and community opposition to projects.

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

4.4.9 Timing for delivery of consented projects

In the context of the above figures and noting that earlier delivery of projects has a greater impact on cumulative emissions compared with later delivery, it is important to consider timelines for delivering a project from the date it receives a planning grant. Based on experience within the team at Fehily Timoney and Company of working on other wind farm developments, the approximate timelines below should be considered as best case scenarios in meeting the 9GW 2030 target, assuming no judicial reviews, and any additional planning consents required in relation to grid connection methods, are all dealt with in parallel with the timelines below:

- Planning grant to executed grid connection offer = 12 months
- Grid offer to secure route to market = 6 months
- Project financing = 6 months
- Project construction and delivery = 18 months.

This implies that in a best case scenario, from the date of a planning grant to the date of energisation, there will be a minimum of 3.5 years. This implies that planning grants issued after mid 2027 will have little to no chance of contributing to the 9GW 2030 target for onshore wind. It is equally important to note, that the later these projects are delivered the less their impact will be on cumulative emissions over the period.

4.4.10 Onshore RESS Auctions Progress to Date

Ireland's Renewable Electricity Support Scheme (RESS) auctions are competitive processes, run by the Department of Environment, Climate and Communications (DECC) designed to support the development of renewable energy projects across the country. The goal is to help Ireland meet its renewable energy targets, reduce greenhouse gas emissions, and transition towards a more sustainable energy system.

Following the publication of the *Climate Action Plan* 2021, DECC published a future auction schedule[2] that set out the indicative forward auction volumes required to support renewable energy targets at that time. Table 4-4, below, sets out a comparison of the target volumes established at that time (noting that renewable energy targets have since increased) vs the actual volumes procured in the onshore auctions to date:

Table 4-4: RESS Auction target vs procured volumes

Year, Auction	Indicative Target volume (GWh)	Actual Procured volumes (GWh)
2022, RESS 2 [3]	1,000 – 3,500	2,747
2023, RESS 3 [4]	2,000 – 5,500	933
2024, RESS	-	2,071

It is noteworthy that less than half of the minimum target volume of projects as predicted was successfully procured in recent RESS auctions. It is widely accepted that this has been primarily driven by an insufficient throughput of positive wind farm decisions through the planning system. In RESS 3 only 148.4MW of onshore wind cleared the auction spread across 3 separate wind farms, with 24MW's failing to clear. This stands in stark contrast to 479MW and 414MW successfully cleared under RESS 1 and RESS 2, respectively.

It is also noteworthy that the average price in RESS 3 was over €100 / MWh making it by far the most expensive renewable auction in Europe. Again, the lack of new projects with modern turbine technologies being consented through the planning system is a significant contributing factor to these high costs. While the specific target volume for RESS 4 in GWh was not included in the *RESS Final Auction Results* released on 27th September 2024, it is generally understood that the RESS scheme aims to significantly increase Ireland's renewable electricity generation capacity. The *Total Deemed Energy Quantity* (DEQ) was 2,070.97 GWh, with the price for Onshore Wind being €90.47/MWh.

Project Response:

During its operation, the wind turbines at the Project will have an assumed rated electrical power output of between 61.6 MW to 72.6 MW. This may vary as a result of the final turbine type, power output modelling and turbine development over the period leading up to construction.

For the purposes of this EIAR, an electrical power output of between 61.6 MW to 72.6 MW has been used to calculate the power output of the proposed wind farm. Therefore, for the purposes of calculating MWh, it is anticipated that the Project will have an Export Capacity ranging from 61.6 MW to 72.6 MW, depending on the turbine power output. This range of generation capacity has been used to calculate the power output of the Project over its 30-year operational life based on the following calculation:

[2] https://assets.gov.ie/212080/be6fa505-d4e7-4634-80d9-64fd9d1a0800.pdf

[3] https://www.eirgridgroup.com/site-files/library/EirGrid/RESS-2-Final-Auction-Results-(R2FAR).pdf

[4] https://www.eirgridgroup.com/site-files/library/EirGrid/RESS-3-Provisional-Auction-Results-(R3PAR).pdf

5 https://cms.eirgrid.ie/sites/default/files/publications/RESS-4-Final-Auction-Results-R4FAR.pdf

A x **B** x **C** = Megawatt Hours of electricity produced per year where:

- **A** = The number of hours in a year: c. 8,760 hours
- **B** = The capacity factor, which takes into account the intermittent nature of the wind, the availability of wind turbines and array losses etc. A capacity factor of 35 % is applied here.
- **C** = Rated capacity of the wind farm: 72.6 MW

Based on a maximum Rated capacity of 61.6 MW to 72.6 MW, the Project has the potential to produce up to 222,591.6 MWh (megawatt hours) of electricity per year over the lifetime of the Project.

The electricity produced by the proposed wind farm would be sufficient to supply between c. 41,300 – 45,500 Irish households with electricity per year (depending on MEC), based on the average Irish household using 4.2 MWh of electricity (this figure is taken from the March 2017 Commission for Energy Regulation (CER) Review of Typical Consumption Figures Decision Paper and Commission for Regulation of Utilities Energy and Water Monitoring Report for 2021).

Further details relating to the positive effects of the proposal on air quality and climate change are included in Chapter 7- Air and Climate of this EIAR.

4.4.11 National Energy Security Framework

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

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

Project Response:

The Project contributes to the nation's target increase of renewable energy from 30% to 80% by 2030 and supports the doubling of onshore wind energy in Ireland by 2030 as set out in the CAP24 and CAP25. The project supports national targets of climate change mitigation and reduction in greenhouse gas emissions where significant focus has been set out in the recent *Climate Action and Low Carbon Development (Amendment) Act 2021*. The ambitious programme for government is prioritising carbon neutrality and renewable energy generation. In light of this, it is important for the nation to rely on proven technologies such as on-shore wind in order to meet the near and long-term objectives. Furthermore, the *National Energy Security Framework* underlines the importance of new renewable energy generation projects, such as the Project, in securing Ireland's energy supply in light of the ongoing conflict in Ukraine and associated energy supply chain issues leading to shortages and energy price increases.

The Project promotes the generation of renewable energy at appropriate locations and supports the achievement of a low carbon economy by 2050. It is therefore considered that the Project at Shancloon is in line with national policy and supports the achievement of national energy and sustainability targets.

4.5 Regional Policies

4.5.1 Regional Spatial and Economic Strategy 2020-2032 (RSES): Northern and Western Region

The Regional Spatial and Economic Strategy 2020-2032 (RSES) provides the framework through which the aspirations of the National Planning Framework will be implemented in the Northern and Western Region (NWRA) and provides a 12-year strategy for the period 2020 - 2032 to achieve the objectives and vision of the Regional Assembly. It reaffirms the objective to proactively work towards achieving a low carbon economy. It includes a commitment to promote change across business, public and residential sectors to achieve reduced Green House Gas emissions, improve energy efficiency and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture. The RSES provides a development framework of the region that supports the implementation of the National Planning Framework (NPF) and the relevant economic policies and objectives of the Government.

One of the strategy's "*Five Growth Ambitions*" that underpin the strategic vision for the region, relates to infrastructure, which states:

> *"Provision and maintenance of economic infrastructure such as energy, water and wastewater are key to delivering compact growth and a connected, vibrant, inclusive, resilient and smart region."*

The RSES also includes a range of Regional Policy Objectives which support the development of renewable energy projects such as the Project, which include the following in Table 4-5:

Table 4-5: Regional Spatial and Economic Strategy (RSES) - Regional Policy Objectives

Regional Policy Objective	Description
RPO 4.17	"*To position the region to avail of the emerging global market in renewable energy by:* - *Stimulating the development and deployment of the most advantageous renewable energy systems* - *Supporting research and innovation* - *Encouraging skills development and transferability* - *Raising awareness and public understanding of renewable energy and encourage market opportunities for the renewable energy industry to promote the development and growth of renewable energy businesses.* - *Encourage the development of the transmission and distribution grids to facilitate the development of renewable energy projects and the effective utilization of the energy generated from renewable sources having regard to the future potential of the region over the lifetime of the Strategy and beyond."*
RPO 4:18	"*Support the development of secure, reliable and safe supplies of renewable energy, to maximise their value, maintain the inward investment, support indigenous industry and create jobs."*

As described within the RSES and shown in Table 4-5 above, it is recognised that the northwest region has a rich natural energy resource, with the RSES demonstrating that the region is open to renewables energy developments and recognises the required transition from fossil fuels to the use of renewables. The strategy further notes that this can contribute to new employment, community sustainability and attract additional people to the region.

The RSES of the Northern and Western Region also highlights the fact that Galway is the fastest growing city in Ireland over the past 50 years, with one of the primary focuses of the RSES strategy being on the Metropolitan Area Strategic Plan (MASP) for Galway City. The MASP for Galway City states the role of Climate Change in planning the growth and development of cities and towns in the county, where it states:

> *'the reduction in our carbon footprint must be embedded through, for example, the delivery of sustainable land use patterns, sustainable transportation Initiatives, protection and enhancement of the green network and enhancement of biodiversity, promotion of renewable energy technologies…"*

The closest large town to the Project is Tuam, which is classed in the RSES as a "*key town*" within County Galway, and is recognized as having development potential, with key future priorities for the town being to:

> *"promote Tuam as a destination for business, growing the economy to a scale appropriate to its strategic location capitalising on its enhanced connectivity".*

Project Response:

The development of the Project will align with the RSES in developing the renewable energy potential in the region identified by the RSES, and delivering on the need identified in the RSES to transition from fossil fuels to the use of renewables. The strategy also highlights the potential benefits of this transition, including job creation, community sustainability and attracting additional people to the region.

4.6 Local Policy

4.6.1 County Development Plans

The Project is located in Co. Galway, however, due to the Projects proximity to County Mayo, this section contains an extensive review of the relevant policies and objectives regarding development management within the Galway County Development Plan 2022-2028 (GCDP) and the Mayo County Development Plan 2022 2028 (MCDP).

4.6.2 Galway County Development Plan 2022-2028 (GCDP)

With regard to the Project at Shancloon, the GCDP sets out the Count's policies and objectives with regard to renewable energy development and its efforts to implement climate change mitigation. Since being adopted by Galway County Council on the 20th June 2022, the Galway County Development Plan 2022-2028 (GCDP) has climate action as a core component, with each chapter of the GCDP containing a section that "*climate proofs*" each spatial strategy and objective. An example of this can be seen in '*GCDP, Chapter 14: Climate Change, Energy and Renewable Resource*', where it is an objective of the GCDP:

> *''To reduce the carbon footprint by integrating climate action into the planning system in support of national targets, support indigenous renewable sources in order to reduce dependence on fossil fuels and improve security of supply and the move to a competitive low carbon economy."*

Further policies are contained throughout the GCDP. Table 4-6 below lists the policies which support climate change targets and associated renewable energy generation in Co. Galway as set out in Chapter 14 of the GCDP.

Table 4-6: GCDP: Policy Objectives in Support of Climate Change Targets

Policy Objective	Description
CC 1: Climate Change	*"Support and facilitate the implementation of European, national and regional objectives for climate adaptation and mitigation taking into account other provisions of the Plan (including those relating to land use planning, energy, sustainable mobility, flood risk management and drainage) and having regard to the Climate mitigation and adaptation measures"*
CC 2: Transition to a Low Carbon Climate Resilient Economy	*"It is a policy objective of the Planning Authority to support the transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050, byway of reducing greenhouse gases, increasing renewable energy, and improving energy efficiency."*
CC 5: Climate Adaptation and Mitigation	*"To promote, support and direct effective climate action policies and objectives that seek to improve climate outcomes across County Galway through the encouragement and integration of appropriate mitigation and adaptation considerations and measures into all development and decision-making processes."*
CC 6: Local Authority Renewable Energy Strategy (LARES)	*"To support the implementation of the Renewable Energy Strategy contained in Appendix 1 of the Galway County Development Plan to facilitate the transition to a low carbon county."*
CC 7: Climate Action Fund	*"Support the delivery of sustainable development projects under the European Green Deal and utilise the Climate Action Fund/ Just Transition Fund established under the National Development Plan to encourage public and private climate mitigation and adaptation projects in line with criteria set out by the Fund at that time."*
CC 8: Climate Action and Development Location	*"To implement, through the plan and future local areas plans, policies that support and encourage sustainable compact growth and settlement patterns, integrate land use and transportation, and maximise opportunities through development location, form, layout and design to secure climate resilience and reduce carbon dioxide and greenhouse emissions."*
CC 9: Mainstreaming Climate Change Adaptation	*"Galway County Council shall incorporate climate change adaptation into land use planning, building layouts, energy, transport, natural resource management, forestry, agriculture and marine waters."*

4.6.3 Local Authority Renewable Energy Strategy (LARES)

The Renewable Energy Strategy (RES) for County Galway contains policies specific to wind energy development for the County jurisdiction, which are contained within the *Local Authority Renewable Energy Strategy* (LARES), contained within '*Appendix 1: Renewable Energy Strategy*' of the GCDP.

The LARES provides strategic direction to achieve the following within County Galway:

- Encourage renewable energy;
- Provide guidance regarding the siting and designing of wind energy developments;
- Promote the economic development of wind energy;
- Promote energy security and the establishment of a low carbon economy.

The GCDP and the associated LARES establish constraints, setbacks and buffer zones for onshore wind farm development in County Galway. The constraints considered are as follows:

The GCDP and LARES prioritise environmental and planning considerations by ensuring the protection of areas of ecological or landscape importance. Wind Farm development might be restricted in areas designated as Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs), with areas designated as having a high scenic value or cultural heritage significance may face development limitations.

Further constraints are considered to be technical in nature, and are related to wind resource availability, grid capacity, and proximity to existing infrastructure.

The GCDP and LARES do not stipulate fixed setback or buffer distances from features such as residential receptors, ecological or archaeological features, hedgerows, pipelines or drains. Instead, they establish a framework for Galway County Council to assess applications on a case-by-case basis in relation to the following criteria, which are assessed and included in the EIAR which accompanies this application.

These include criteria such as:

- Turbine Setbacks: The minimum distance between a wind turbine and a residential or commercial receptor is determined through site specific assessments such as a shadow flicker assessment. This assessment considers factors like turbine height, rotor diameter and the receptors location to ensure minimal shadow flicker impact on residents and receptors.
- Buffer Zones: The LARES recommends buffer zones for specific features such as residential receptors, landscape or ecological features. These buffer zones are not rigid requirements, with the implementation of specific buffer zones depending on the nature and scale of the Project, proximity to a receptor or the sensitivity of the feature as shown below:
    - Residential or Commercial Receptors: The LARES emphasizes the importance of minimizing visual impact on residential properties. While no specific buffer zone is stipulated in the LARES, a case-by-case assessment of applications is conducted which considers factors such as turbine size and height, landscape context and visual impact to determine the appropriate distance from features such as residential or commercial receptors. Consideration is also given where local residents and/or stakeholders observations can be considered to determine a wind farms design by way of implementation mitigation measures where noise or visual impact is deemed a valid concern.

- High Amenity Landscapes: Areas designated as having high scenic value may require larger buffer zones to minimize visual intrusion. The specific buffer zone will be determined during the planning application process and are based on the criteria as outlined previously in relation to aspects such as turbine size and height, landscape context and visual impact, with the GCDP and LARES acknowledging the potential cumulative impacts of multiple wind farms in an area.
- Archaeological or Ecological Features: The GCDP and LARES prioritize protection of sensitive archaeological or ecological features. Buffer zones around archaeological features or areas in proximity to or connection to SACs or SPAs will be established based on ecological impact assessments and consultations with relevant authorities. These buffer zones can vary significantly depending on the specific feature and its sensitivity.

The exact setback distances and buffer zones for a particular wind farm development will be determined during the planning application process as outlined within the GCDP and LARES. However, the Project has been designed in accordance with the '*Wind Energy Development Guidelines (2006)*' and has been designed with recognised industry best practice for each of the different environmental aspects such as noise, hydrology etc. which are included in the EIAR chapters which accompany this planning application. The Wind Energy Development Guidelines (2006) guidelines, considered in conjunction with the GCDP and LARES, advise a set back distance of 500m of turbines from noise sensitive properties as the 2006 guidelines state that, "*In general, noise is unlikely to be a significant problem where the distance from the nearest turbine to any noise sensitive property is more than 500 metres*". Furthermore, the 'Draft Revised Wind Energy Development Guidelines (2019)' outlining a minimum 500m or 4 times tip height set back from residential and commercial receptors (based on visual effects).

The Project will achieve a minimum separation distance in excess of 720 m (4 times tip height) between the closest receptor and the proposed turbines (noting that the closest property to a turbine (Eircode H54 KH73) is located 357 m distance from Turbine T01, however this property is under the control of the Developer and will be taken out of use as a residential property and will not be occupied for the operational period of the development should the Proposed Development be granted planning permission). The wind farm design and layout process and turbine delivery route etc. involved detailed and repeated site surveys, environmental impact assessments and consultations with relevant authorities as outlined in the GCDP and the LARES. As shown on the LARES Wind Development Potential map in Figure 4.1, Volume IV, the Project site is located in close proximity to County Mayo to the north west, with the proposed wind farm contained entirely within County Galway. This shows the northern portion of the Project is located within an area Wind Development Potential designation as '*Open to Consideration'*, and the southern section of the Project shown as located in an area designated '*Generally to be Discouraged*', with no turbines in the part of the site within the area designated 'Generally to be Discouraged'

An explanation for the designations as outlined within the LARES '*Wind Energy Deployment Zones Description'* are described in Table 4-7, below.

Table 4-7: LARES: Wind Energy Deployment Zones Description

Mapping Key	Meaning	Method of calculation
Strategic Areas	*Areas where existing wind developments are situated. These areas have already been subjected to detailed legal and development management processes – both by the local authority – as well as an Bord Pleanala in many cases. Such sites represent important assets that need to be recognised and protected. A further consideration is that many of these sites will be subject of new planning applications for renewal, re-powering or extension.*	*Areas of existing wind developments with a 600m buffer zone around each.*
Acceptable in Principle	*Areas where Wind Energy development will be facilitated as an appropriate landuse. Development Management should attempt to control the development of new uses that would reduce the viability of Wind Energy in these areas.*	*The highest scoring bracket from the combination of wind opportunity and sensitivity weighting scores.*
Open to Consideration	*"Areas where Wind Energy development is likely to be favourable considered - subject to the results of more detailed assessment of polices and potential effects*	*The middling scoring bracket from the combination of wind opportunity and sensitivity weighting scores"*
Generally to be Discouraged	*"Areas where Wind Energy development is unlikely to be favourably considered on account of potential to adversely effect protected landscape, water, ecological resources and residential amenity."*	*The lowest scoring bracket from the combination of wind opportunity and sensitivity weighting scores.*
Not Open to Consideration	*"Areas where Wind Energy Projects, would be likely to conflict with policies of the council to protect landscape, water, ecological resources and residential amenity. Such areas may also include areas and species protected by the Habitats Directive."*	*Areas excluded due to Natura sites, Iconic and Special Landscape Sensitivity, Geological Heritage sites and Settlements.*

The LARES sets out '*Renewable Energy Resource Targets* (RE)' for the county , it does not demonstrate how the plan will help the State achieve its overall national targets, and ultimately contribute to national renewable energy targets and the transition to a low carbon economy, as shown in Table 4-8, below.

Table 4-8: GCDP: - LARES Renewable Energy Resource Targets

Renewable Energy Resource Targets	Description
Section 14.8.1 Policy – RE 1: Renewable Energy Generation and Ancillary Facilities	*"To facilitate and support appropriate levels of renewable energy generation and ancillary facilities in the county to meet national, regional and county renewable energy targets, to facilitate a reduction in CO2 emissions and the promotion of a low carbon economy."*
Section 14.8.1 Policy – RE 2: Local Authority Renewable Energy Strategy	*"The policy objectives and Development Management Standards set out in the Local Authority Renewable Energy Strategy for County Galway shall be deemed the policy objectives and development management standards for the purpose of the Galway County Development Plan 2022-2028."*
Section 14.8.1 Policy – RE 3: Wind Energy Developments	*"Promote and facilitate wind farm developments in suitable locations, having regard to areas of the County designated for this purpose in the Local Authority Renewable Energy Strategy. The Planning Authority will assess any planning application proposals for wind energy production in accordance with the Local Authority Renewable Energy Strategy, the DoEHLG Guidelines for Planning Authorities on Wind Energy Development, 2006 (or any updated/superseded documents), having due regard to the Habitats Directive and to the detailed policy objectives and Development Standards set out in the Local Authority Renewable Energy Strategy."*
Section 14.8.1 Policy – RE 5: Renewable Energy Strategy	*"Support and facilitate the sustainable development and the use of appropriate renewable energy resources and associated infrastructure within the County having due regard to the Habitats Directive and to the detailed policy objectives and Development Standards set out in the Local Authority Renewable Energy Strategy as follows:* • *Renewable Energy Transmission;* • *Renewable Energy Generation;* • *'Strategic Areas' for renewable energy development;* • *Onshore Wind Energy;* • *Solar Energy;* • *Bioenergy/Anaerobic Digestion;* • *Micro-renewables;* • *Marine Renewables;* • *Hydro Energy;* • *Geothermal Energy;* • *Alternative Technologies;* • *Energy Efficiency & Conservation;* • *Sustainable Transport;* • *Auto production;* • *Battery Storage;* • *Repowering/Renewing Wind Energy Developments; Community Ownership."*
Section 14.8.1 Policy – RE 7: Renewable Energy Generation -Transition to a Low Carbon Economy	*"To facilitate and support appropriate levels of renewable energy generation in County Galway, considering the need to transition to a low carbon economy and to reduce dependency on fossil fuels."*

The LARES provides guidelines to allow County Galway to be more energy secure and less reliant on traditional fossil fuels, thus, enabling future energy export and meeting assigned climate change targets. Within this, LARES identifies the potential for on-shore wind energy developments, with the vision of LARES as being:

> *"To facilitate and encourage renewable energy generation and a low carbon energy transition across County Galway, in the interests of future generations, through the application of energy efficient technology and the harnessing of indigenous renewable energy resources, whilst respecting the need to conserve areas of environmental, cultural and economic value."*

The LARES includes Galway County Councils objectives for renewable energy over the lifetime of GCDP, with the policy objectives considered most relevant contained in Table 4-9, below:

Table 4-9: GCDP: Policy Objectives for Local Authority Renewable Energy Strategy (LARES)

LARES Policy Objective (PO)	Description
PO 1 - Transmission Grid Network	*"To support the development of the transmission grid network in order to sustainably accommodate both consistent and variable flows of renewable energy generated in County Galway."*
PO 2 - Renewable Energy Transmission	*"Proposed renewable energy generation projects shall fully consider the capacity of the existing transmission grid network in determining the optimal grid connection for the project, in accordance with the proper planning and sustainable development of the area."*
PO 3 - Renewable Energy Generation	*"To facilitate and support appropriate levels of renewable energy generation in County Galway, in light of the need to transition to a low carbon economy and to reduce dependency on fossil fuels."*
PO 4 - Prioritisation of 'Strategic Areas' for renewable energy development	*"The areas that are identified as 'Strategic Areas' for renewable energy development will be prioritised for renewable energy uses over other uses, in accordance with the proper planning and sustainable development of the area."*
PO 13 – Wind Energy Generation	*"To increase renewable energy generation levels from wind energy developments in County Galway, given the recognised wind energy potential of the County."*
PO 14 – National Wind Energy Guidelines	*"All onshore wind energy developments shall comply with the National Wind Energy Development Guidelines or any subsequent version thereof."*
PO 15 - Acceptable in Principle	*"Wind energy development proposals in the areas that are 'Acceptable in Principle' for renewable energy development will be considered in accordance with the LARES and the proper planning and sustainable development of the area."*
PO 16 - Open to Consideration	*"Wind energy development proposals in areas that are identified as 'Open to Consideration' for wind energy development will be considered in accordance with the LARES and the proper planning and sustainable development of the area."*

LARES Policy Objective (PO)	Description
PO 17 - Generally to be Discouraged	*"Wind energy development proposals in areas that are identified as 'Generally to be Discouraged' for wind energy development will be considered in accordance with the LARES and the proper planning and sustainable development of the area."*
PO 18 - Not Normally Permissible	*"Wind energy development proposals in areas that are identified as 'Not Normally Permissible' for wind energy development will be considered in accordance with the LARES and the proper planning and sustainable development of the area."*
PO 25 - Micro-renewable energy developments	*"To facilitate and recognise micro-renewable energy developments as effective contributors to the generation of renewable energy in County Galway."*
PO 26 - Community-led micro-renewable developments and off-grid developments	*"To favourable consider community-led micro renewable developments and off-grid developments appropriate, and in accordance with the LARES and the proper planning and sustainable development of the area."*
PO 27 - Micro-renewable technologies	*"To actively promote and encourage the uptake of micro-renewable technologies, with particular focus on retrofitting existing developments where appropriate, and in accordance with the LARES and the proper planning and sustainable development of the are."*

During the lifetime of the GCDP, County Galway must increase the provision of secure and adequate electricity infrastructure to meet future growth in demand, GCDP Section 14.7.3 'Electricity and Gas Network' outlines the following:

> *"The de-carbonisation of the economy will require a significant increase in the provision of a secure and adequate electricity infrastructure to meet the growth in demand and to ensure that an efficient and reliable electricity supply is available to households, business and industry. A strong transmission grid is essential to attract and retain industrial investment, to ensure competitive energy supplies, to achieve balanced development, to reduce dependency on fossil fuels, and to achieve climate change targets."*

County Galway's approach to electricity and gas networks are further outlined in Table 4-10, below:

Table 4-10: GCDP: Policy Objectives Electricity and Gas Network (EG)

EG Policy Objective	Description
EG 1 - Gas Network and Generating Capacity	*"To support the development of the gas network and associated generating capacity in order to sustainably support and augment renewable electrical energy generated in County Galway."*
EG 2 - Electricity Transmission Networks	*"(a) To support the development of the transmission grid network in order to sustainably accommodate both consistent and variable flows of renewable energy generated in County Galway.* *(b) Proposed renewable energy generation projects shall fully consider the capacity of the existing transmission grid network in determining the optimal grid connection for the project, in accordance with the proper planning and sustainable development of the area.* *(c) In respect of proposed renewable energy developments, transmission grid capacity should be considered as a constraint where the Transmission Development Plan, or any other equivalent plan of the TSO, does not identify infrastructure reinforcement measures unless transmission grid capacity can be demonstrated.* *(d) Notwithstanding ecological and environmental considerations, grid connection routing for development proposals should show all alternative routes that were considered, and should avoid materially impacting the road network, where possible. Undergrounding should be considered where it will significantly negate any identified impacts.* *(e) It is important that the necessary transmission and distribution infrastructure is facilitated and put in place in order to maximise the renewable energy potential of County Galway. Liaison with Eirgrid, as a TSO, and alignment with their transmission plans and strategies will be of vital important in this respect.*

4.6.4 GCDP Landscape Character Assessment (LCA)

Appendix 4 of the GCDP contains a *Landscape Character Assessment* (June 2022), which contain a detailed '*Landscape Character Types for Galway*' and a '*Landscape Sensitivity Assessment*' of the county.

4.6.4.1 Landscape Character Types

The GCDP LCA identifies 10 no. *Landscape Character Types* for Galway county. Figure 4.2, Volume IV, shows the 'Landscape Character Types', with the Project located within the Landscape Character Type of the Project lands is the '*North Galway Complex Landscape Type*' which is described as:

> *"An extensive grassland plain stretching from the Suck River in the east to the watershed of the River Clare in the west. It includes elevated areas such as Slieve Dart in the north, as well as lakes, turloughs, raised bogs, wetlands and winding rivers. Agriculture, scattered forestry and associated field patterns are very mixed and can exhibit large and abrupt changes of character over very short distances, especially in areas around bogs. It has a dense network of smaller settlements and roads, though at a lower density than the southern plains of the county. Open areas around bogs produce extensive sky views and the area that are free from light pollution."*

4.6.4.2 Landscape Sensitivity Assessment

The 'Landscape Sensitivity Assessment', as shown in Figure 4.4, Volume IV, evaluates "*A landscape's capacity to absorb new development, without exhibiting a significant alteration of character*". The Galway County 'Landscape Sensitivity Map' shows the entirety of the Project site is located within a Landscape Sensitivity categorised as being '*1 Low - Unlikely to be adversely affected by change'*.

4.6.5 Galway County Development Plan 2022-2028 - Development Management Standards

In drafting the GCDP, Galway County Council are required to consider proper planning and sustainable development with regards to sustainable development specific to economic, social and environmental considerations. The Development Management Standards which must be complied with when assessing planning applications are set out within Chapter 15: Development Management Standards of the GCDP, with key Development Management Standards that are relevant to the Project outlined in Table 4-11, below:

Table 4-11: GCDP – Key Development Management (DM) Standards

Development Management (DM) Standards	DM Description
Chapter 15: **Section 15.13.3 Renewable Energy Proposals**	**DM Standard 69:** Wind Energy: When assessing planning applications for wind energy developments the Council will have regard to; • the Wind Energy Development Guidelines for Planning Authorities, DoEHLG, (2006) and any amendments to the Guidelines which may be made; and • the Local Authority Renewable Energy Strategy. In addition to the above, the following local considerations will be taken into account by the Council in relation to any planning application; • Impact on the visual amenities of the area; • Impact on the residential amenities of the area; • Scale and layout of the project, any cumulative effects due to other projects and the extent to which the impacts are visible across the local landscape; • Visual impact of the proposal with respect to protected views, scenic routes and sensitive landscapes (Class 2, 3 and 4); • Impact on nature conservation, ecology, soil, hydrology, groundwater, archaeology, built heritage and public rights of way; • Impact on ground conditions and geology; • Consideration of falling distance plus an additional flashover distance from wind turbines to overhead transmission lines; • Impact of development on the road network in the area; and • Impact on human health in relation to noise disturbance (including consistency with the Word Health Organisations 2018 Environmental Noise Guidelines for the European Region), shadow flicker and air quality; • Proposals for the decommissioning of the project following cessation of use or expiry of the permitted duration of use. This list is not exhaustive, and the Council may consider other requirements contained in the chapter on a case by case basis with planning applications should the need arise.

Project Response:

As shown in Figure 4-2, Volume IV, the Project is located within two Policy Objective (PO) areas within the GCDP and the LARES, which are:

- **PO 16 - Open to Consideration**: Wind energy development proposals in areas that are identified as 'Open to Consideration' for wind energy development will be considered in accordance with the LARES and the proper planning and sustainable development of the area.
- **PO 17 - Generally to be Discouraged**: Wind energy development proposals in areas that are identified as 'Generally to be Discouraged' for wind energy development will be considered in accordance with the LARES and the proper planning and sustainable development of the area.

The northern section of the Project containing the turbines is within *PO 16- Open to Consideration*, with the only elements of the Project located within *PO 17 - Generally to be Discouraged* being the substation building. With regard to the Policy Objectives attributed to the Project, the GCDP and the LARES states a project such as the Project will be considered once in accordance with the LARES and the proper planning and sustainable development of the area.

The southern section of the Project is contained within '*PO 17 - Generally to be Discouraged*' for wind development. In recognition of the GCDP and LARES Policy Objective, the Project design has included no wind turbines within this designated area. The only elements of the Project located within the southern section located within PO - 17 is the substation building, facilitating connection of the project to the national grid. This agricultural style structure is designed in accordance with the LARES and the proper planning and sustainable development of the area.

The development of a wind farm in accordance with the proper planning and sustainable development of the area as described within '*PO 16 - Open to Consideration'*, aligns with the GCDP and LARES which advocates that wind development is required in such a location so as to allow county Galway to contribute to national and regional renewable energy targets. With regard to LARES policy objective '*PO 17 - Generally to be Discouraged',* this policy objective demonstrates wind energy development in areas identified as '*Generally to be Discouraged*' is not an exclusionary policy, but a restrictive policy to ensure any wind energy development will adhere to the GCDP and the LARES and the overall proper planning and sustainable development of the area.

As outlined above, by generating renewable wind energy at Shancloon, the Project will displace thousands of tonnes of carbon dioxide over its lifetime and allow county Galway to contribute to Ireland reaching net zero by 2050. The Project will adhere to GCDP policies directly related to sustainable development, climate action, energy efficiency, economic development, environmental protection, landscape and visual impact, community engagement, infrastructure development, biodiversity conservation, flood risk management, coastal zone management, rural development, transport and connectivity, housing and land use, heritage and cultural conservation, renewable energy development and energy security. By adhering to these policy objectives, wind farm developers can ensure that their projects contribute to the sustainable development of the county and support the goals outlined in the GCDP

Environmental considerations such as contained within the EIAR for the Project are a crucial aspect of the GCDP and LARES. The relevant policies described above emphasize the protection of landscapes, water resources, ecological resources and residential amenities which may be influenced by any development in the area. The Project at Shancloon and the associated TDR has been designed to ensure minimal impact on these environmental factors, with the proposed turbines and associated substation not giving rise to any adverse effects on landscapes, water or ecological resources or residential amenities.

As described in detail within the chapters of the accompanying EIAR, the careful planning and design of the Project and the assessments and surveys conducted demonstrate the Project complies with the GCDP and the relevant Policy Objectives for LARES, in relation to the proper planning and sustainable development of the receiving environment. The EIAR also demonstrates the area contained within PO 16 and PO 17 as being robust and having capacity to accommodate the Project, and that the site in its totality is capable of accommodating the Project without significant negative effects to the landscape or ecology of the area.

The Project is located fully within the '*North Galway Complex Landscape'*. This landscape type has areas of fragmented landuse agriculture and forestry which can accommodate development such as the Project. It also has extensive open landscapes suitable for maximising wind energy production where turbines are currently located. This landscape type also contains a lower density population with less concentrated settlement centres than other LCA designations. The project design to locate all wind turbines in the northern section of the Project site demonstrates a considered approach with regard to the LCA for this area, with all environmental impacts addressed within the accompanying EIAR.

Impacts to Landscape Sensitivity of projects such as the Project depend on factors such as elevation of the site and slope and aspects related to the types of land-cover and soil. With regard to the location of the Project site at Shancloon, the entire project is contained within the Landscape Sensitivity - *1 Low 'Unlikely to be adversely affected by change*', with all aspects related to the Landscape Sensitivity and the suitability of the Project being addressed in the EIAR accompanying this application.

In its adherence to the GCDP and the LARES, the Project at Shancloon can not be shown to be in material contravention of the GCDP and the LARES, as the policy analysis contained within this chapter, and assessments contained within the accompanying EIAR, showing the Project adheres to both PO 16 and PO 17, as well as adhering to the overall proper planning and sustainable development of the area.

4.6.6 Mayo County Development Plan 2022-2028 (MCDP)

At its closest point, the turbine array is located c. 4km north-east of Shrule, County Mayo (which is the closest settlement to the Project) and c. 8.5km north-west of Tuam, County Galway. Therefore, due to the proximity of the Project to the Mayo county border, a policy review has been conducted of the Mayo County Development Plan 2022-2028 (MCDP). Since being adopted by Mayo County Council on the 10th August 2022, the Mayo County Development Plan 2022-2028 (MCDP) now presents an extensive list of policies and objectives regarding development management within the County over the life of the MCDP. This outlines how the implementation of the MCDP will contribute to realising overall national targets on renewable energy and climate change mitigation.

The MCDP outlines the key relevant policies and objectives within Chapter 11 Climate Change and Renewable Energy which addresses the importance of supporting the development of renewable energy resources and related infrastructure, with a '*Strategic Aim*' which states:

> *"The strategic aim of this chapter is to transition to a low carbon and climate resilient county, with an emphasis on reduction in energy demand and greenhouse gas emissions, through a combination of effective mitigation and adaptation responses to climate change; in addition to maximising the opportunities to become a national leader in renewable energy generation, whilst increasing the resilience of our Natural and Cultural Capital to climate change by planning and implementing appropriate adaptation measures."*

Chapter 2 '*Core & Settlement Strategy*' contains 'Strategic Aims' to:

- Economic Development - To promote and enhance Mayo's economic development potential through increased resilience in the county's enterprise, underpinned by talent and innovation, thereby ensuring that Mayo is best placed to excel in the long-term delivery of sustainable jobs and an enhanced standard of living for all.
- Infrastructural Development - To protect, improve and provide water, wastewater, surface water and flood alleviation services throughout the county, and to facilitate the provision of high-quality information communication technology, broadband, telecommunication information and electricity network required to support and enhance the key aims of best place to live, work, visit and invest.
- Sustainable Communities - To develop and support vibrant sustainable communities in Mayo where people can live, work and enjoy access to a wide range of community, health, educational facilities and amenities, suitable to all ages and needs, in both urban and rural areas, thereby supporting a high quality of life for all to enjoy.
- Climate Action and Renewable Energy - To transition to a low carbon and climate resilient county, with an emphasis on reduction in energy demand and greenhouse gas emissions, through a combination of effective mitigation and adaptation responses to climate change; in addition to maximising the opportunities to become a national leader in renewable energy generation, whilst increasing the resilience of our Natural and Cultural Capital to climate change by planning and implementing appropriate adaptation measures.

MCDP Chapter 11 '*Climate Action and Renewable Energy*', Section 11.6, describes Mayo County Council's support for the climate change targets, with the relevant Climate Action Policies (CAP) outlined in Table 4-12, below.

Table 4-12: MCDP: Mayo Climate Action Policies (CAP)

Policy	Description
CAP 1	*"To support and enable the implementation and achievement of European and national objectives for climate adaptation and mitigation as detailed in the following documents, taking into account other provisions of the Plan (including those relating to land use planning, energy, sustainable mobility, flood risk management and drainage);* *Climate Action Plan (2019 and any subsequent versions);* • National Climate Change Adaptation Framework (2018 and any subsequent versions). • Relevant provisions of any Sectoral Adaptation Plans prepared to comply with the requirements of the Climate Action and Low Carbon Development Act 2015, including those seeking to contribute towards the National Transition Objective, to pursue, and achieve, the transition to a low carbon, climate resilient and environmentally sustainable economy by the end of the year 2050; and Mayo Council Climate Change Adaptation Strategy (2019-2024 and any subsequent versions)."

Policy	Description
CAP 2	*"To support the National Climate Change Strategy and methods of reducing anthropogenic greenhouse gases on an ongoing basis through implementation of supporting objectives in this Plan, particularly those supporting use of alternative and renewable energy sources, sustainable transport, air quality, coastal zone management, flooding and soil erosion and promotion of the retention of, and planting of trees, hedgerows and afforestation, subject to no significant adverse effects on the environment including the integrity of the Natura 2000 network."*
CAP 4	*"To support local, regional, national and international initiatives for climate adaptation and mitigation and to limit emissions of greenhouse gases through energy efficiency and the development of renewable energy sources, which make use of all natural resources, including publicly owned lands, in an environmentally acceptable manner."*
CAP 6	*"To support the transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050, by way of reducing greenhouse gases, increasing renewable energy, and improving energy efficiency and supporting nature based solutions to climate adaptation and mitigation that provides co benefits."*
CAP 9	*"To support Ireland's renewable energy commitments outlined in national policy by facilitating the development and exploitation of all appropriate renewable energy sources at suitable locations within the county, where such development does not have a negative impact on the surrounding environment (including water quality), landscape, biodiversity or local amenities, so as to provide for further residential and enterprise development within the county."*

Section 11.6.5.1 'Electricity Generation' further shows how Mayo County Council is supportive of the transition from fossil fuel-based energy to renewable energy and acknowledges that this transition will need to be underpinned by a strong electricity transmission network, where it states:

> *"The provision of a safe, secure and reliable electricity supply is a critical component necessary to sustain economic growth in Ireland. To this end, Ireland in recent years has been phasing out the use of fossil fuels, such as oil, natural gas, coal and peat to generate electricity, in favour of renewable energy sources. Ireland's Transition to a Low Carbon Energy Future 2015-2030, the Government's White Paper on Energy, sets out a roadmap for a low carbon energy system to 2030. The White Paper acknowledges in the short to medium-term, the mix of non-renewables will shift away from more carbon-intensive fuels, like peat and coal, to lower-carbon fuels like natural gas. The Climate Action Plan (2019) targets that 70% of electricity must come from renewables by 2030. In 2018, 22% of all energy inputs to electricity generation were from renewable sources, whereas coal and peat accounted for 21% of fuel inputs. Mayo County Council will endeavour to plays its part in promoting more sustainable renewable electricity generation, which are the multiple forms of renewable energy discussed further in the chapter."*

Chapter 11.7 '*Renewable Energy*' of the MCDP contains '*Renewable Energy Policies*' (REP) to increase the capacity of renewable energy in Ireland. To assist Ireland achieve the target of 80% of electricity sourced from renewables by 2030 (CAP 24), which requires up to 8.2 GW onshore wind to allow Ireland reach net zero energy system by 2050. CAP24 has increased targets, which indicates that renewable energy policy support would likely be even stronger, if the most recent targets had been taken into account. The relevant REPs are outlined in Table 4-13, below.

Table 4-13: MCDP: Renewable Energy Policies (REP)

Policy	Description
REP 1	*"To support Ireland's renewable energy commitments outlined in national policy by facilitating the development and exploitation of a range of renewable energy sources at suitable locations within the county, where such development does not have a negative impact on the surrounding environment (including water quality), landscape, biodiversity or local amenities to ensure the long-term sustainable growth of the county."*
REP 2	*To support, within the context of the Offshore Renewable Energy Development Plan (OREDP) and its successors, the progressive development of Ireland's offshore renewable energy potential, including domestic and international grid connectivity enhancements*
REP 3	*"To actively encourage and support the sustainable development, renewal and maintenance of energy generation infrastructure in order to maintain a secure energy supply, while protecting the landscape, archaeological and built heritage and having regard to the provisions of the Habitats Directive.*
REP 4	*"To ensure that developers of proposed large-scale renewable energy projects carry out community consultation in accordance with best practice and commence the consultation at the initiation of project planning."*
REP 5	*"To promote the use of efficient energy storage systems and infrastructure that supports energy efficiency and renewable energy system optimisation, subject to the proper planning and sustainable development of the area and consideration of environmental and ecological sensitivities."*
REP 6	*"To work with relevant stakeholders and industry to establish Mayo as a centre of excellence for renewable energy research and development activities."*
REP 7	*"To promote the harnessing of wind energy to contribute toward decarbonising County Mayo, including new emerging by-product markets."*

Chapter 10 '*Natural Environment',* Section 10.4.7 contains the 'Landscape Character Areas' (LCA) and 'Scenic Routes and Views' contained within the county, with the MCDP 'Landscape Policy' shown in Table 4-14, below:

Table 4-14: MCDP: Natural Environment Policy (NEP) for Landscape Policy

Policy	Description
NEP 1	*"To protect, enhance and contribute to the physical, visual and scenic character of County Mayo and to preserve its unique landscape character."*

The '*Landscape Appraisal for County Mayo'* Section 4.1.5. describes the area in proximity to the Project site as:

> *'Policy Area 4: Drumlins and Inland Lowlands - These undulating areas of pasture, woodland and forest make up the remainder of the County and are considered to have a generally similar ability to absorb development. Many of these areas are underlain by glacial drumlins and incorporate low-lying lakelands."*

See Figure 4.2, Volume IV, for mapped landscape appraisal relative tot eh project location.

In relation to the Project, the relevant policies are outlined in Table 4-15, below.

Table 4-15: Landscape Appraisal for County Mayo: Policies

Policy	Description
Policy 14	*"Encourage development that will not interrupt or penetrate distinct linear sections of primary ridge lines when viewed from areas of the public realm."*
Policy 16	*"Preserve from development any areas that have not already been subject to development, which have retained a dominantly undisturbed upland/moorland character."*
Policy 21	*"Recognise that these areas are made up of a variety of working landscapes and contain the vast proportion of the Counties population within principal towns and on rural holdings. These also incorporate all of the major national primary and regional roads, and railways."*
Policy 22	*"Continue to permit development that can utilise existing infrastructure, whilst taking account of absorption opportunities provided by the landscape and prevailing vegetation."*
Policy 23	*"Encourage development that will not significantly interfere or detract from scenic lakelands vistas, as identified in the Development Plan, when viewed from areas of the public realm."*
Policy 24	*"Encourage development that will not result in detrimental impacts (through excessive bulk, scale or inappropriate siting) on the landscape at a local or micro level as viewed from areas of the public realm."*

4.6.7 Mayo Renewable Energy Strategy 2011 - 2020 (RES)

The Mayo Renewable Energy Strategy (RES) 2011-2020 outlines how County Mayo can capitalise on renewable energy resourses such as wind, wave, solar and other renewable energy forms. Adopted by Mayo County Council on 9th May 2011, the Mayo RES identifies areas most suitable for renewable energy developments in a tiered system. Mayo County Council are currently conducting a review of the Mayo RES, with the consultation period open between Friday 26th July and Friday 6th September.

The current Mayo RES provides a vision for the development of renewable energy in Mayo as:

- "*Renewable energy can help to develop an energy focus within the Mayo economy, while making a positive contribution to the reduction of greenhouse gas emissions.*
- *Improved awareness of energy issues should lead to a greater commitment to reducing power consumption. Underlying improvements in energy efficiency will have beneficial effects for the environment and the economy.*
- *The clear benefits of renewable energy cannot, however, be realised at any cost and a balance needs to be struck between economic, social and environmental interests or pressures. A key challenge is to manage this balance within a changing world. Other influences on technological change, economic expectations, social trends and ecosystem dynamics mean that each of these factors will change over the lifetime of a strategy. Dynamic judgements need to be made about what is appropriate and acceptable change.*
- *This Strategy recognises that our environment is evolving constantly. Those changes have helped shape the environment as it is today and will continue to mould it for the future.*
- *Renewable energy will add a new dimension to the landscape, the economy and the availability of energy in communities. This Strategy aims to ensure that, overall, the advantages presented by renewables outweigh the disadvantages for most people and for the wider environment.*
- *By actively engaging in the use of renewable energy technologies, Mayo is supporting the wider aspirations of Ireland to be a world leader in the development and deployment of renewable technologies.*
- *Renewable energy will not solve all of our energy related problems, but it can make a significant contribution.*"

Project Response:

Mayo County Council demonstrates strong policy support for wind energy development and associated infrastructure at a local level, which shows a commitment to shift to a low carbon economy and away from using fossil fuels.

The Project of the Shancloon wind farm in County Galway, located as it will be near the border with County Mayo, requires consideration regarding its landscape and visual impact on the area of east Mayo adjoining the Galway county border. The key relevant policies and objectives within the MCDP and the RES in relation to a wind farm development are on reducing and eliminating and visual intrusion and preserving the scenic quality of the landscape. To address any environmental impacts in relation to hydrologically connected areas and the landscape and any visual impact, the submitted EIAR for the Project includes assessments which may impact areas of County Mayo. The inclusion of Mayo in the EIAR assessment is crucial as it ensures that any impacts on Mayo's landscape and assets such as water quality or visual amenity are thoroughly evaluated, particularly from areas of high scenic value and tourist interest. The Shancloon EIAR considers factors such as the visibility of the turbines from key viewpoints and their cumulative visual impact with other wind farms within 20 km of Shancloon which includes counties Galway and Mayo.

The EIAR also evaluates any environmental impacts on areas in Mayo that are hydrologically connected to the Project site, and includes potential effects on water quality, drainage patterns and local ecosystems. The assessment ensures that any hydrological connections between the Project site and sensitive areas in Mayo are identified and mitigated against to prevent adverse environmental consequences.

4.7 Other Relevant Policies and Guidelines

4.7.1 Department of Environment, Heritage and Local Government – Wind Energy Development – Planning Guidelines 2006

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

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

Project Response:

The Project has considered the provisions of the *Wind Energy Development Guidelines* 2006 in the design and siting of the Shancloon Wind Farm. The Project is considered to be in line with the recommendations as set out in the Guidelines, which are set out in the relevant chapters of the accompanying EIAR.

4.7.2 Draft Revised Wind Energy Development Guidelines (December 2019)

Published by the *Department of Housing, Planning and Local Government* in December 2019, the *Draft Wind Energy Guidelines* were opened up for public consultation for 10 weeks until 19th February 2020, with the '*Wind Energy Guidelines 2006*' still the relevant guidelines for the purposes of *Section 28 of the Planning and Development Act 2000* (as amended) until the *Department of Housing, Planning and Local Government* publish revised guidance. The *Climate Action Plan 2024* (CAP24) sets out a timeline of Q4 2024 for publication of the final updated Wind Energy Guidelines.

The aim of the updated guidelines is as follows:

> *"to 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 ensure 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. They should also be of assistance to developers and the wider public in considering wind energy development."*

The *Draft Wind Energy Guidelines* 2019 have identified the potential impacts wind energy development may have on the landscape, natural and built environment, and recognise that these must be considered in conjunction with the legitimate concerns of local communities. Therefore, the key points of note in the draft Revised Guidelines include:

- Revised set back distances. 4 times the tip height is to be applied between turbines and the nearest point of the curtilage of any residential property with a mandatory minimum set back distance of 500 meters to be applied for visual amenity purposes.
- Revised noise limits provide a higher level of protection to nearby residential receptors. The draft guidelines propose a noise limit, referred to as a Relative Rated Noise Limit in the range of 35 – 43 dB(A), while not exceeding the background noise level by more than 5dB(A) with an upper limit of 43 dB(A).
- The draft guidelines confirm a policy of 'zero shadow flicker' at nearby existing dwellings or other affected properties.
- Wind energy developers will have to provide an opportunity for the Project to be of enduring economic or social benefit to the local community, whether by facilitating community investment/ ownership in the project, other types of benefits/ dividends, or a combination of the two.

The revised guidelines encourage the implementation of a standardised operational period of 30 years for wind energy developments across the country.

Project Response:

The Climate Action Plan 2024 (CAP24) sets out a timeline of Q4 2024 for publication of the final updated Wind Energy Guidelines. However, the Project complies with stated set back and visual impact setback requirements as outlined within the *Draft Wind Energy Guidelines* 2019.

4.7.3 Irish Wind Energy Association – Best Practice Guidelines for the Irish Wind Energy Industry

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

Project response:

The approach to the Project is in line with the 2012 IWEA guidelines in that it is in accordance with relevant planning and environmental legislation, requirements for environmental impact assessment, provides an environmentally sensitive design, takes account of best practice health and safety and provides opportunities for quality public engagement in order to develop a responsible and sensitive wind energy project.

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

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

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

Project response:

Throughout the consultation process for the Project at Shancloon, specific regard has been taken of this guidance document with community and statutory body consultations complying with the best practice principles in community engagement and community commitment. Details of the consultation process conducted throughout the design and development stages of the project are detailed in Chapter 5 – Scoping and Consultation.

4.7.5 Code of Practice for Wind Energy Development in Ireland – Guidelines for Community Engagement

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

This Code of Good Practice:

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

Project response:

The guidance states that the methods of engagement should reflect the nature of the project and the potential level of impact that it could have on a community. Throughout the consultation process the applicant has adhered to the *Code of Practice for Wind Energy* while consulting with the community and statutory bodies, with details of the consultation process conducted throughout the design and development stages of the project are detailed in Chapter 5 – Scoping and Consultation.

4.7.6 Commission for Regulation of Utilities: Grid Connection Policy

The Commission for Regulation of Utilities (CRU) (previously the Commission for Energy Regulation (CER)) launched a new grid connection policy in March 2018 for renewable and other generators, known as ECP-1, which will seek to allow "shovel ready" projects that already have a valid planning permission, connect to the electricity networks. The principal objective which guides this decision is to allow those projects which are 'shovel ready' to have an opportunity to connect to the network, along with laying the foundations for future, more regular batches for connection.

The first connection offers were issued in August 2018 with the '*Ruleset for Enduring Connection Policy Stage 2 (ECP-2)*' published in 2020 stating the system operators are expected to hold further batches at the end of March 2021.

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). The application windows are envisaged to be open for the month of September each year.

Project response:

The ECP system replaces the previous 'Gate' system of grid connection applications. With regard to the Project at Shancloon, the Applicant will seek a grid connection offer in accordance with the CRU policy following the successful granting of planning permission.

4.7.7 Renewable Electricity Support Scheme 4 (RESS 4)

The Renewable Electricity Support Scheme 4 (RESS 4) is a critical component of Ireland's strategy to transition to a sustainable, low-carbon energy system. This fourth iteration of this scheme continues to build on the successes and lessons learned from the previous rounds, aiming to further enhance Ireland's renewable energy capacity and meet it climate targets.

As with the previous iterations of the RESS, RESS 4 is designed to support the development of renewable electricity projects through competitive auctions, which then determine which projects receive financial support, ensuring that the most cost-effective and efficient projects are selected. The RESS scheme is aligned with Ireland's *Climate Action Plan* and the EU's *Clean Energy Package*, which includes the *Renewable Energy Directive* and the *National Energy and Climate Plan*, all of which have been described above. A key aim of RESS 4 is to increase the share of renewable energy in Ireland's overall electricity mix, contributing to the national target of achieving 80% renewable electricity by 2030, while reducing greenhouse gas emissions and enhance Ireland's energy security.

Eligible projects include onshore wind, offshore wind, solar, hydro along with many other renewable generation methods. The RESS scheme has a number of key policy objectives, which include the following:

- Cost Effectiveness: Ensure that renewable energy projects are developed at the lowest feasible cost to electricity consumers, leveraging competitive forces to drive down prices;
- Energy Security: Enhance Ireland's energy security by diversifying the energy supply and reducing dependence on imported fossil fuels;
- Technology Diversity: Broaden the renewable electricity technology mix to include a variety of sources such as onshore wind, offshore wind, and solar power;
- Community Participation: Increase community involvement and ownership in renewable energy projects, ensuring that local communities benefit from the transition to renewable energy;
- Sustainability: Promote long-term sustainability by supporting projects that contribute to the reduction of greenhouse gas emissions and the achievement of Ireland's climate targets;
- Economic Growth: Support the growth of the green economy, creating sustainable job opportunities and fostering innovation in the renewable energy sector;
- Consumer Protection: Shield consumers from high and volatile fossil fuel prices, ensuring long-term benefits and stable energy costs.

Project response:

If planning permission is granted, the Project will apply for RESS supports subsequent to RESS 4, which was finalised and published on 27th September 2024. The Project will provide €2 per MWh to the community fund, which is calculated in accordance with the '*Terms and Conditions'* of the relevant '*Onshore Competition under the Renewable Electricity Support Scheme* (RESS)'.

5. CONCLUSION

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

The SEAI report, Energy in Ireland (2020a) sets out the nation's latest progress towards renewable energy targets, with an overall shortfall on the 2020 targets as renewable energy production accounts for c. 12% of the nation's energy production while the 2020 target was set for 16%. While Ireland has come a long way in increasing renewable energy generation, the targets are ever increasing from a European perspective. 2050 European targets effectively mean that Europe's energy production will have to be almost carbon-free by 2050, with an aim to increase reliance on renewables from 30% to 80% by 2030.

In response to this, Ireland produced the Climate Action Plan 2024 in which this CAP24 sets out an objective to more than double Ireland's onshore wind energy capacity to 9 GW by 2030, in order to meet new renewable energy targets and reduce emissions. Therefore, there is a clear national mandate to accommodate significant onshore wind within the next decade. Furthermore, the National Planning Framework, places greater emphasis on a move to a low-carbon economy to reduce Ireland's carbon footprint by integrating climate action into the planning system in support of national targets.

It is this commitment on energy and climate policy that justifies a clear need for renewable energy generation in Ireland. It is recognised that there are a range of renewable resources alternatives that could be explored to meet our International and European commitments, however onshore wind is recognised as being a key to achieving this as emphasised in the *Climate Action Plan 2024* and 2025 (CAP24 and CAP25). It is also a proven technology that will be critical to meeting the near-term renewable targets up to 2030.

The *Regional Spatial and Economic Strategy* (RSES) for the North and Western Region supports the increased use of renewable energy sources to transition the northwestern region of Ireland to a low carbon, climate resilient and environmentally sustainable economy which mitigates against climate change. The RSES aims to leverage the North and Western Region as a leader and innovator in sustainable renewable energy generation, supporting the development of a renewable energy project in an appropriate location, such as that of the Project.

National and regional energy policies and objectives have been reinforced by the Galway County Development Plan 2022-2028 (GCDP) and the Mayo County Development Plan 2022-2028 (MCDP) with regard to renewable energy in an effort to mitigate climate change. There is a plan-lead approach to wind energy development within county Galway, with the County Galway '*Local Authority Renewable Energy Strategy*' (LARES) demonstrating the policy context for the site at Shancloon and surrounding area.

The Project site is located within two key Policy Objective (PO) areas in relation to wind development. The PO relevant to the northern section of the Project is PO 16, with PO 17 being relevant to the southern section. These PO are as follows:

- ***PO 16 - Open to Consideration****: Wind energy development proposals in areas that are identified as 'Open to Consideration' for wind energy development will be considered in accordance with the LARES and the proper planning and sustainable development of the area.*
- ***PO 17 - Generally to be Discouraged****: "Wind energy development proposals in areas that are identified as 'Generally to be Discouraged' for wind energy development will be considered in accordance with the LARES and the proper planning and sustainable development of the area.*

As outlined throughout this EIAR Chapter and addressed in further detail within the accompanying EIAR chapters, the northern section of the Project is located within PO 16, which is an area designated as '*Open to Consideration'* for wind development. The policy context for the northern section within PO 16 is considered favourable for the Project from a policy perspective with regard to renewable energy provision. The Project is considered favourable at a local level with respect to designations and the ability for the site to accommodate the Project as outlined within the GCDP LARES, with the Project in adherence to the proper planning and sustainable development of the area.

In relation to the southern section of the Project located within PO 17, this area is identified as being '*Generally to be Discouraged'* for wind energy development, and it is proposed to be the location of the substation, which will be an agricultural style structure. As described in detail within the chapters of the accompanying EIAR, there are no wind turbines proposed within the area designated as PO 17 '*Generally to be Discouraged*', with the assessments conducted as part of this planning application demonstrating the substation proposed for this location complies with the proper planning and sustainable development of the receiving environment. Assessments on the proposed location of the substation demonstrate the area contained within PO 17 as being robust and having the capacity to accommodate the Project in compliance with the LARES and to the proper planning and sustainable development of the area.

The Project aligns with the strategic aims and vision of the LARES in relation to increasing Galway County's renewable energy generation capacity and lessening Galway's dependence on traditional fossil fuels while contributing to Ireland's national climate change targets. The GCDP policies and objectives with regard to renewable energy development and its efforts to implement climate change mitigation aims to support wind energy and contribute to Ireland's national renewable energy targets. GCDP and the LARES aims to transition Galway County towards a low-carbon economy by promoting renewable energy technologies and energy efficiency while respecting the need to conserve the landscape, the community and environmentally sensitive areas.

A Policy Objective such as PO 17 where wind development is designated as '*Generally to be Discouraged*' in an area is not a policy prohibiting, or entirely excluding, the development of wind energy within a given area. Policies relevant to this Project such as PO 16 and PO 17 are included in Development Plans and Renewable Energy Strategies to protect Landscape Character and Landscape Sensitivities. These Policy Objectives are drafted based on a Landscape Character Assessment of a large geographical area, which include a macro assessment of localised Landscape typologies within a given County to determine an areas capacity to absorb development. By utilising open language such as '*Generally to be Discouraged'*, the inclusion of '*Generally*' in the terminology demonstrates that Galway County Council recognises that there will be nuances and exceptions where specific areas within the landscape covered by a designation such as PO 17 'Generally to be Discouraged' can comfortably accommodate Wind Farm development.

Therefore, PO 17 is not a "*zero tolerance*" policy objective for this general area but is interpreted as a restrictive policy included in the GCDP LARES to ensure any wind energy development within this area of County Galway will adhere to principles of proper planning and sustainable development as contained within the current GCDP and the LARES. As shown in the assessments contained in this EIAR, the impact of the Project on the local environment has been minimised, and the Project complies with the relevant legislation, policy and guidance described in this chapter, including the GCDP and LARES.

The TDR will be confined to the public road corridor on the route from Galway Port to Shancloon via the N59 and R332 and onto the Castlegrove Road prior to entering the Project site. The delivery route may require limited and targeted works along a section of the route to facilitate the delivery of turbines and substation components, with no impact on the environment. Once all components are delivered to the site via the defined TDR, therefore, no mitigation measures are considered necessary. All the components of the Project, which includes the proposed wind farm site and the TDR, have been assessed against all the policies, guidance and legislation outlined in this chapter, and the Project has been shown to be in compliance with the relevant policies, guidance and legislation relating to the Project at Shancloon.

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

There is a clear need for renewable energy generation in Ireland, and onshore wind such as the Project is recognised as being a key to achieving this, and we consider the Project to be consistent with International, National and Regional energy policies, as well as the county policies as contained within the *Galway County Development Plan* 2022-2028 and *Mayo County Development Plan 2022-2028*.

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