MKO Planning and Environmental Consultants

Planning Report

Cooloo Wind Farm, Co. Galway

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1. EXECUTIVE SUMMARY

The Proposed Cooloo Wind Farm consists of 9 no. wind turbines which will have an estimated installed capacity between 54MW and 64.8MW, based on a turbine capacity of between 6 and 7.2 MW. Each wind turbine will have an overall tip height of 180m. For grid connectivity, the Proposed Development will be connected to the national grid via 110kV underground cabling from a proposed on-site 110kV substation to the existing 110kV Cloon substation at Cloonascragh, County Galway. The Proposed Grid Connection is not included in this application and will be subject to a separate application to An Coimisiún Pleanála under Section 182A of the Planning and Development Act 2000, as amended.

This Planning Report has been prepared in support of a planning application for the Proposed Development under section 37E of the Planning and Development Act 2000, as amended. The application is accompanied by an Environmental Impact Assessment Report and Natura Impact Statement for the Proposed Project (i.e. the Proposed Wind Farm and the Proposed Grid Connection). The introductory sections of this report, provide an overview of the Application Site, the Proposed Wind Farm design, the applicant, and a summary of the pre-planning process. The project design process is outlined, demonstrating the rationale for the site's selection and its suitability for wind energy development. The iterative design process details each of the design stages from the initial design to the final design iteration. Each design iteration responded to the specific constraints on the site, as they were identified by site surveys and detailed analysis.

The Proposed Development is strongly supported by EU and national policy and legislation. At an EU level the Proposed Development is aligned with by the EU Renewable Energy Directive and REPowerEU. At a national level, the Proposed Development is supported by the National Planning Framework, Climate Action Plan 2025, the National Energy Security Framework, among other national climate and energy policy. The legally binding greenhouse gas emission reduction target and the obligations of public bodies under the Climate Action and Low Carbon Development Act 2015, as amended, should also be considered in the assessment of this application. A full appraisal of all the relevant policy and legislation is provided in section 6 of this report.

Despite favourable site-specific characteristics for the development of wind energy, parts of the Application Site have been zoned 'Generally to be Discouraged' in the Local Authority Renewable Energy Strategy adopted as part of the Galway County Development Plan 2022-2028. However, a robust analysis of the wind energy constraints in County Galway indicated that the Application Site has the potential to accommodate wind energy development. The Proposed Development is thoroughly assessed against and found to be in compliance with the policies and objective of the Galway County Development Plan 2022-2028.

The development of sites viable for wind energy development is essential to meet European, national, and local climate and renewable energy targets. Ireland needs to scale up renewable energy rollout at an unprecedented rate to achieve our 9GW wind energy target and 80% RES-E target set out in the Climate Action Plan 2025. The reality of achieving these targets is the installation of an average of 1.8GW[1] of renewable energy per year until 2030. If permitted, the Proposed Development will be installed and operational before the end of the decade, adding a minimum of 54MWs of renewable, clean energy to our national wind energy capacity. This will not only contribute to the decarbonisation of the electricity sector but will play a role in the decarbonisation of other sectors and the transition to a low carbon, climate resilient economy.

A wind energy capacity assessment for County Galway was carried out as part of this report to establish the viable area in the county for wind energy development. The results of the wind energy capacity assessment are compared to the estimations of the installed MW wind energy capacity by 2030 set out in

[1] *Climate Change Advisory Council (2025), Electricity Sectoral Review: Annual Review 2025. https://www.climatecouncil.ie/councilpublications/*

the Local Authority Renewable Energy Strategy. The wind energy capacity assessment demonstrates that there is an over estimation of viable land in favourable policy areas. If County Galway is to reach an installed capacity of 1,350MW as set out in the Local Authority Renewable Energy Strategy, areas outside of the 'Acceptable in Principle' and 'Open to Consideration' will need to be considered and developed for wind energy, subject to proper planning and sustainable development. The results from the wind energy capacity assessment are summarised in the Table 1 below.

	Viable Area with favourable zoning for new wind energy developments (Acceptable in Principle, Open to Consideration)	Potential yield from viable area	Total MW capacity 2030
LARES Estimation*	121.64 km^2	851MW**	1,350MW
Wind Energy Capacity Assessment	41.73km^2	417.33MW***	882.33 MW

*LARES estimation: 15% of AIP land used, 7.5% of OTC land used.
** Based on 7MW per 1 km^2 as used in the LARES
***Based on 10MW per 1 km^2 as of MKO experience

Table 1: Wind Energy Capacity Assessment Summary

To conclude, it is submitted that, based on the evidence provided in this report, the Application Site is suitable for wind energy development, and the Proposed Development is in accordance with the proper planning and sustainable development of the area and County Galway as a whole. Furthermore, despite the site's favourable characteristics, it is found that the wind energy zoning designation of the 'Generally to be Discouraged' areas of the Application Site is unsubstantiated, based on Galway County Council's 'opportunity' and 'sensitivity' analysis mapping, set out in the Local Authority Renewable Energy Strategy. Finally, it is clear from the wind energy capacity assessment prepared by MKO, that every site, regardless of wind energy zoning, needs to be considered on its merits to deliver the substantial amount of wind energy required under the Local Authority Renewable Energy Strategy, CAP 25 and the Climate Action and Low Carbon Development Act 2015, as amended.

An Coimisiún Pleanála will be aware of certain legal obligations, under the Climate Action and Low Carbon Development Act 2015, as amended, in respect of the processing of certain planning applications relating to renewable energy developments. In particular, the mandatory obligation on the Commission to exercise its decision-making functions "*in a manner consistent with*" National Climate Policies and Objectives. Further, the mandatory obligation on the Commission to exercise its decision-making functions *"in a manner consistent with"* the National Climate Policies and Objectives also takes precedence over the lessor obligation to merely *"have regard to"*, inter alia, the *"policies and objectives for the time being of planning authorities"* under Section 143(1) of the Planning Act. These *"policies and objectives"* are set out by planning authorities in their development plans. In effect, this means that the National Climate Policies and Objectives set out therein to take precedence over the policies and objectives of planning authorities set out in county development plans.

2. INTRODUCTION

This Planning Report has been prepared by MKO in support of a planning application relating to the proposed Cooloo Wind Farm. This Planning Report accompanies the Strategic Infrastructure Development ('SID') application being made directly to An Coimisiún Pleanála ('ACP' 'the Commission') under the provisions of Section 37E of the Planning and Development Act 2000, as amended ('the Act'). Following pre-planning consultations, ACP determined the proposed Cooloo Wind Farm to be SID in correspondence dated 19th September 2025.

2.1 Report Definitions, Structure and Contents

For the purposes of this Planning Report:

- Where the 'Proposed Development' is referred to this encompasses the development applied in this application as set out by the development description included on the site notice.
- Where the 'Proposed Project' is referred to this encompasses the entirety of the project for the purposes of this EIA in accordance with the EIA Directive. The Proposed Project is described in detail in Chapter 4 of this EIAR.
- Where the 'Proposed Wind Farm' is referred to, this refers to turbines and associated foundations and hard-standing areas, meteorological mast, access roads, temporary construction compound, underground cabling, peat and spoil management, site drainage, biodiversity enhancement, turbine delivery accommodation works and all ancillary works and apparatus. The Proposed Wind Farm is described in detail in Chapter 4 of this EIAR.
- Where the 'Proposed Grid Connection' is referred to the 110kV onsite substation, battery energy storage system and 110kV underground cabling connecting to the existing Cloon 110kV substation, and all ancillary works and apparatus. The Proposed Grid Connection is described in detail in Chapter 4 of this EIAR.
- Where the 'Application Site' is red line planning application boundary included on the planning drawings.

This planning report is structured as follows:

- **Introduction –** The Introduction section includes an introduction to the applicant, the Proposed Development, the application documents and the summary of the report findings
- **Project Background** – The Project Background section outlines the strategic need for the Proposed Development, the Application Site and its current land use and planning history.
- **Consultation** – EIAR scoping, pre-application and community consultations details, RED III checklist.
- **Proposed Development** – The Proposed Development section provides a description of the main elements of the Proposed Development subject to this Section 37E planning application along with the design process from site selection through to the final design.
- **Legislative Context**: Requirements under the Planning and Development Act 2000, as amended, along with an overview of the legislative framework for renewable energy and climate action.
- **Planning Policy Appraisal** – The Planning Policy Appraisal section includes a review and evaluation of the Proposed Development against European, national, regional, and local policy.
- **Wind Energy Capacity Assessment** – The Wind Energy Capacity Assessment provides an analysis of the wind energy development potential in County Galway.

2.2 The Applicant

The applicant, Neoen Renewables Ireland Ltd. is a subsidiary of Neoen, established in 2008 and headquartered in Paris. At the end of 2024, Neoen had 8.9GW of total capacity of electricity in operation or under construction across 14 countries.

Neoen entered the Irish market in 2016 and now operates eight wind farms and three solar farms in the republic of Ireland, with a combined capacity of 112 MW in operation and a portfolio of 1.7 GW in development.

2.3 Summary of the Proposed Development

The Proposed Development will comprise 9 no. wind turbines with a tip height of 180 metres (m) and will have an estimated installed capacity between c.54MW and 64.8MW. The Proposed Development meets the threshold for Strategic Infrastructure Development (SID) as set out in the Seventh Schedule of the Planning and Development Act 2000, as amended, being *'An installation for the harnessing of wind power for energy production (a wind farm) with more than 25 turbines or having a total output greater than 50 megawatts'* and is therefore being submitted directly to ACP as a Strategic Infrastructure Development in accordance with Section 37E of the Planning and Development Act 2000, as amended. This approach has been confirmed following consultations with the ACP under the provisions of Section 37B of the Act as amended (case reference ACP-316466). An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) accompanies this planning application submitted to the Commission. The Proposed Grid Connection, 110kV infrastructure and associated works will be subject to a separate, future planning application under Section 182A of the Act , however, it is assessed in this EIAR.

The application for the Proposed Development includes a design flexibility opinion issued by ACP under Section 37CD allowing for permission for a range of turbine dimensions to be sought. The design flexibility opinion is included as addendum 4 of the application form.

2.4 Application Documentation

Planning Documents

The planning particulars submitted as part of this application include the following:

- Cover Letter
- Application Form
- Site Notice
- Newspaper Notice
- Planning Report.

Planning Drawings

The planning drawings submitted as part of this application include the following:

- Drawing Schedule
- Planning Drawings

Environmental Impact Assessment Report

The EIAR submitted as part of this application includes X no. of volumes, which are as follows:

- Volume 1: Non-Technical Summary & EIAR
- Volume 2: Photomontages

- Volume 3: Appendices

Natura Impact Statement

The NIS submitted as part of this application includes the following:

- NIS Volume 1 – Main Report (including AASR)
- Appendices

2.5 Summary of Findings

This planning report analyses the planning policy against which the Proposed Development will be assessed. The main findings of the report are outlined as follows:

- The Proposed Development is strongly supported by climate and energy policy and law at a European, national and regional level.
- The Proposed Development is supported by, and is in compliance with, the policy and objectives of the Galway County Development Plan 2022 – 2028 ('GCDP').
- The Proposed Development has been designed in accordance with the Wind Energy Development Guidelines for Planning Authorities (2006) and the Development Management Standards for Renewable Energy Proposals, as set out by the GCDP.
- The rationale behind the designation of the part of the Application Site as 'Generally to be Discouraged' in the Local Authority Renewable Energy Strategy ('LARES') for wind energy development is unclear. The Application Site performs well against the scoring matrix and opportunity/ sensitivity maps that informs the wind energy designations in the LARES.
- The LARES fails to designate a sufficient quantum of land as "Acceptable in Principle" or "Open to Consideration" to achieve the targets specified in the plan, and consequently, County Galway's share of the 9GW of onshore wind required under the Climate Action Plan 2025 ('CAP 25').

3. PROJECT BACKGROUND

3.1 Strategic Need for the Proposed Development

The global climate is breaking down as a result of greenhouse gas emissions from the burning of fossil fuels. News stories of climate change-related extreme weather events are now a constant in the daily news cycle. According to the World Meteorological Organisation's '*State of the Global Climate Report 2024'* published in March 2025[2], atmospheric concentration of CO2, methane and nitrous oxide in 2023 reached the highest levels in the last 8000,000 years. These levels continued to increase in 2024. The report also states that the year 2024 was the warmest year on observational record, with temperatures exceeding 1.5° C above pre-industrial levels[3].

The European State of the Climate Report 2024 produced by World Meteorological Organisation and European Union[4] reported that:

- Global average values of surface air and sea surface temperatures have increased significantly since the pre-industrial era, by around 1.3° C to 1.4° C and 1° C, respectively.
- Since 1999, an average sea level rise of around 3.7mm globally and 2mm-4mm in the European region has been observed.
- A record increase in CO2 (+2.4 ppm) and methane (+12 ppb) have been observed since 2020.
- Glaciers in Scandinavia and Svalbard recorded the highest annual rates of mass loss.
- In 2024, Europe experiences the most widespread flooding since 2013.

The impacts of climate change are currently being felt, the severity of which is expected to increase with further greenhouse gas emissions. Ireland's Climate 2024 Provisional Summary Report produced by MET Eireann[5], reflects clear and distinct impacts arising from climate change effects in Ireland:

- 2024 was noted to be the fourth warmest year on record in Ireland with an average temperature of 10.72°c.
- 2024 was provisionally the 39th wettest year since 1941 with most primary stations recording below-average levels of annual rainfall.
- Further precipitation changes are expected, with a 9% potential decrease in the summer, causing water shortages and impacting agriculture, and a 24% potential increase in winter, elevating the risk of flooding in various regions.
- Seven named storms impacted Ireland in 2024, with Storms Isha and Darragh both producing particularly violent storm-force winds.

To combat the effects of climate change, Ireland must decarbonise its economy by 2050. There is no "silver bullet" or magic solution to do so. There is an urgency to ensure that real changes occur without delay, which means that a gradual shift towards increasing Ireland's use of renewable energy is no longer viable. Every renewable energy project plays a crucial role in meeting Ireland's climate targets. The approval of well-planned, appropriately located renewable energy projects, such as the Proposed Project is not just beneficial-it is imperative. Without decisive action to facilitate renewable energy deployment, Ireland risks missing national and EU commitments, incurring financial penalties, and undermining energy security.

The scale of the challenge we face to decarbonise the Irish economy is enormous, but the climate change implications of not doing so are even greater. There is no other way to decarbonise a modern

[2] *State of the Global Climate 2024 (World Meteorological Organisation, March 2025)*
[3] *State of the Global Climate 2024 (World Meteorological Organisation, March 2025)*
[4] *The European State of the Climate Report 2024 (World Meteorological Organization and European Union, April 2025)*
[5] *Ireland's Climate 2024 Provisional Summary Report (MET Eireann, March 2025)*

society except through renewable energy projects such as the Proposed Development. Over the last 25 years, Ireland has become a world leader in onshore wind energy, with no other country providing a greater share of its electricity from onshore wind[6], with a total of 32% of the Ireland's electricity generated from onshore wind in 2024[7]. As a country, we only became world leaders by consenting and building one wind farm at a time.

Since 1992, Ireland has installed 5,000 MW of onshore wind. Now, with the 2025 Climate Action Plan requiring the amount of onshore wind energy to increase from 5,000 MW to 9,000 MW by 2030, we must install almost double our existing capacity in just under 5 years. To reach this target, hundreds of additional wind farms will have to be connected to the national grid over the rest of this decade. In the same way we only achieved our 2020 target of 40% renewable electricity target one wind farm at a time, we will only get to our target of 9,000MW of onshore wind energy by 2030, one wind farm at a time.

The scale of the challenge was quantified in the 2024 Climate Action Plan, which states that *'To achieve the necessary emissions abatement, an approximately **eight times increase** of renewable energy deployment to **2.3 GW** annually would be needed between **2024 and 2030**.* (emphasis added). In 2024, just 10 wind farm projects were granted planning permission, a total of 717MW[8], well below the volume required to meet the 9 GW target. It is estimated that to reach the Climate Action Plan target, 1,720 MW of onshore wind would have needed to be granted.

The latest climate and energy reports all make one message abundantly clear; we are not acting fast enough. If a major step up in renewable energy deployment levels does not occur, we will fail to reach its renewable energy target and will exceed our carbon budgets. The recently published EPA report *Ireland's Greenhouse Gas Emissions Projections 2024-2055* (May 2025) highlights that Ireland is not on track to meet the national target of 51% emissions reduction target by 2030 compared to 2018 under the Climate Action and Low Carbon Development 2015 (as amended), nor is it projected to meet its EU target of 42% emissions reduction compared to 2005 under the Effort Sharing Regulations. Similarly, the Climate Change Advisory Council make clear that *'progress to reduce emissions is not sufficient for Ireland to meet its national and EU climate obligations'*[9].

As a nation, we are legally bound to our climate targets. The Climate Action and Low Carbon Development Act 2015 (as amended) (the 'Climate Act') legally binds Ireland to achieve net-zero emissions no later than 2050, and to a 51% reduction in emissions by the end of this decade. Section 15 of the Climate Act requires a relevant body (including the Commission) to carry out its functions consistently, insofar as practicable, with specified climate plans and objectives, including the latest Climate Action Plan (CAP25). A recent judgement of the High court delivered on 10th January 2025, provides clarity on the obligations imposed on public bodies under section 15 of the Climate Act (*Coolglass Wind Farm Limited v An Bord Pleanála [2025] IEHC 1*).

Mr Justice Humphreys undertook a detailed consideration of the interpretation of section 15 of the Climate Act and concluded that:

"*...all vectors of interpretation point strongly in the same direction – the need for an imperative reading of s. 15(1) in line with what it says, namely that the board and any other relevant body is required to act in conformity with the climate plans and objectives set out in the subsection unless it is impracticable to do so....*

That does not mean allowing an application which is prohibited by law. That wouldn't be practicable apart from anything else. But it does mean exercising discretionary and evaluative powers in whatever way is most likely to be consistent with the relevant plans and objectives."

[6] https://www.ren21.net/wp-content/uploads/2019/05/gsr_2020_full_report_en.pdf
[7] https://windenergyireland.com/latest-news/7827-irish-wind-farms-provide-a-third-of-our-power-in-2024-and-set-new-energy-milestone
[8] https://windenergyireland.com/latest-news/7831-10-new-wind-farms-approved-by-an-bord-pleanala-in-2024
[9] https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR-2024-SfA-final.pdf

As part of Mr Justice Humphrey's consideration of the interpretation of section 15 of the Climate Act, he states in his judgement that "*an immediate end to business as usual is a precondition for planetary survival*".

Ireland is also legally bound by renewable energy targets at a European level. The latest revision of the Renewable Energy Directive (RED III) introduced a binding EU-wide target for overall RES of at least 42.5% by 2030 and requires Member States to set their national contributions to the EU-wide target. In accordance with RED III and the revised RES target, the Department of the Environment, Climate and Communications (DECC) have published an updated National Energy and Climate Plan (NECP) 2021-2030 in July 2024. The updated NECP committed to achieving a 43% share of renewable energy in total energy consumption by 2030. In the trajectories set out in the updated NECP, it states that Ireland's proposed trajectory will not be in line with the desired trajectory set out in the Governance Regulation (Regulation 2018/1999).

It is clear that there is an abundant amount of policy and legal frameworks in place, published with a single, shared goal: to reduce the impact of climate change that we will all experience. However, policies and objectives, no matter how supportive or how bold, do not reduce greenhouse gas emissions if they remain words on paper. The truth of the matter is implementation is everything. It is well documented, as outlined above, that we are falling at the this most crucial hurdle. Simply, we are not putting the policy into practice. The rapid, far-reaching and unprecedented change called for has not yet materialised, and renewable energy projects are not being built at the volume required.

3.2 Site Location and Context

The Application Site is located in a rural, agricultural landscape in east Galway, approximately 12 km southeast of Tuam. It covers around 299 hectares across several townlands. The nearest settlement is Brierfield, 1.3 km south of the closest turbine, with Moylough 5.3 km to the east. The N63 national road runs to the south of the site, passing within 1.27 km of the nearest turbine as it links Abbeyknockmoy and Moylough. Access is via local roads from the R332 regional road between Tuam and the N63. Existing farm tracks also serve the site.

Land use within the Site is predominately agricultural pasture. Other land uses within the Site include cutover and raised peat bogs, agricultural crops, tillage, transport and forestry. Land uses in the wider landscape comprises a mix of agriculture, peat bogs, electricity transmission and low density residential.

The majority of the Application Site is located within an area designated in the Galway County Development Plan 2022-2028 as an 'Open for Consideration' and within a small area designated as 'Generally to be discouraged' for wind energy development.

3.3 Planning History

A planning search was carried out through Galway County Council online public planning viewer and An Coimisiún Pleanála's online planning portal in September 2025 for relevant planning applications within the Application Site boundary.

Three applications were identified within Application Site. One extant planning application was identified (Pl Ref: 23119), a retention application for an 80 metre high temporary meteorological mast for a period of 5 years. Two expired applications were identified, one application for the construction of a horse stables (Pl Ref: 071064) and one application for a dwelling house (Pl Ref: 061802).

4. CONSULTATION

4.1 EIAR Scoping

A scoping report, providing details of the Proposed Project, was prepared by MKO and circulated in April 2023. MKO requested the comments of the relevant Non-Governmental Organisations and authorities with interest in the specific aspects of the environment with the potential to be affected by the proposal. Telecommunication providers were scoped in February 2024 as part of the constraints mapping process. The responses received aid in identifying potential effects on the environment and provide initial feedback in the early stages of the design iteration process. Full details of the scoping responses received and how any issues raised are addressed in the EIAR is provided in Section 2.7 of Chapter 2 of the EIAR.

4.2 Pre-application Consultation with Galway County Council

Members of the project team and the Applicant met with representatives from Galway County Council (GCC) in accordance with Section 247 of the Planning Act via Microsoft (MS) Teams on the 6th of March 2024. Those in attendance were:

On behalf of GCC:

- Liam Hanrahan
- Eimear O'Doherty
- Patrick O'Sullivan

On behalf of Agent and Applicant:

- Grace Curran (Neoen)
- John Willoughby (MKO)
- Owen Cahill (MKO)
- Eileen Corley (MKO)
- Saoirse Fitzsimons (MKO)
- Ronan Dunne (MKO)

The project team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- An introduction to the Applicant and Project Team.
- A high-level overview of the Proposed Project and the subject site.
- Overview of relevant planning policy including compliance with local wind energy policy.
- Se out the SID process and timeline
- Set out the scope of the Environmental Impact Assessment Report to be undertaken.
- Provided specific details of the scheme relating to LVIA and Ecology.
- Discussed scoping and pre-application/public consultation undertaken to date.

Following this presentation, there was further discussion held between the project team and the representatives of GCC. Matters discussed included:

- Wind energy zoning of the site
- Buffers from designated sites

- Pre-application and community consultation carried out to date
- Potential impact of the Proposed Project on land and soils, archaeology and telecoms
- Operational lifetime and decommissioning

4.3 Pre-application Consultation with An Coimisiún Pleanála

First Pre-Application Meeting - Section 37B

The Applicant engaged with An Coimisiún Pleanála under the provisions of Section 37B of the Planning Act as to whether the Proposed Development would meet the thresholds of the Seventh Schedule of the Planning Act. A SID pre-application meeting under the provisions of Section 37B was held with the Commission via Microsoft (MS) Teams on the 19th of June 2023. Those in attendance were:

On behalf of ACP:

- Paul Caprini (Assistant Director of Planning)
- Karen Hamilton (Senior Planning Inspector)
- Ashling Doherty (Executive Officer)

On behalf of Agent and Applicant:

- Grace Curran (Neoen)
- Owen Cahill (MKO)
- Ronan Dunne (MKO)
- Colm Ryan (MKO)
- Sanghamitra Dutta (MKO)

The project team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- An introduction to the Applicant and Project Team.
- A high-level overview of the Proposed Project and the subject site.
- Overview of relevant planning policy including compliance with local wind energy policy.
- Set out the scope of the Environmental Impact Assessment Report to be undertaken.
- Provided specific details of the scheme relating to LVIA and Ecology.
- Discussed scoping and pre-application/public consultation undertaken to date.
- Set out the projected project timelines.

Following this presentation, there was further discussion held between the project team and the representatives of ACP. Matters discussed included:

- Requirement of clear justification for the location of three turbines outside the area open to consideration.
- Potential impacts due of the Proposed Wind Farm due to the presence of peat on the Site.
- Requirement of constraints mapping of rural dwellings illustrated with buffers overlapping with proposed turbines.
- Further consultation with Local Authorities.
- Forestry felling and the potential for impacts on bats.
- The potential for impacts on the river catchment and sub catchment.
- Recommended engagement with National Park and Wildlife Service (NPWS).
- Haul routes for turbine delivery should be identified and align with standard road approaches.
- Assessment of Natura 2000 sites.

Second Pre-Application Meeting – Section 37B

The Applicant engaged with An Coimisiún Pleanála for a second pre-application meeting under Section 37B of the Planning Act. The second meeting was held on the 10th of July 2025 via Microsoft (MS) Teams. Those in attendance were:

On behalf of ACP:

- Una Crosse
- Donagh O'Donoghue
- Sinead White

On behalf of Agent and Applicant:

- Evan Connolly (MKO)
- Ronan Dunne (MKO)
- Eoin McCarthy (MKO)
- Hannah Rice (MKO)
- Brandon Taylor (MKO)
- Niall Quane (Neoen)

The project team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- An introduction to the Applicant and Project Team
- Updates on the Proposed Project design
- An updated planning policy context and compliance with local wind energy policy
- The scope of the Environmental Impact Assessment Report and progress to date
- An update on the scoping, pre-application, and public consultation undertaken to date
- Set out the projected project timelines

Discussion was held between the project team and the representatives of ACP on the following matters:

- Local planning policy and wind energy zoning
- Peat within the site and the need for peat stability assessments.
- The ecological surveys carried out to date
- Biodiversity enhancement areas
- Proximity to Natura 2000 sites, ecologically sensitive areas
- The impact of construction traffic and potential road upgrades
- Nearest sensitive receptors
- Public consultation carried out to date
- Scoping carried out to date and responses received
- Extent of the Landscape and Visual Assessment

Section 37CC Consultation – Design Flexibility

A design flexibility meeting under Section 37CC(1) Consultation was held with the Commission on the 10th of July 2025 (ACP Ref: 322632), under the provisions of Section 37CC of the Planning Act, in respect of the level of design flexibility to be included in the application. This flexibility meeting request was made in accordance with the legislative provisions (S.I No. 645 of 2023) relating to design flexibility introduced by the Planning and Development, Maritime and Valuation (Amendment) Act 2022. The legislation provides for a process whereby prospective applicants may request a meeting with the Commission for the purpose of receiving an opinion as to whether it is appropriate that an application for permission be made before certain details of the Proposed Development are confirmed. The design team gave an overview of the details unlikely to be confirmed at application lodgement, which were set out as follows:

- Turbine rotor diameter
- Turbine hub height

The parameters within which the turbine specifications will fall were set out as follows:

- Rotor diameter range of 150m – 162m
- Hub height range of 99m to 105m

Discussion was held between the project team and the representatives of ACP on the following matters:

- Background to Design Flexibility
- Design Flexibility Process
- Unconfirmed Details subject of the application
- Rationale for Design Flexibility
- Assessment of Unconfirmed Details

A design flexibility opinion was issued by An Coimisiún Pleanála on 19th September 2025 and accompanies this planning application. The details unconfirmed in this application are the hub height and rotor diameter of the turbines. The range of parameters under which the turbine dimensions will fall are specified on the site notice and in the design flexibility opinion that accompanies this application.

Pre-Application SID Determination Letter

A letter received from An Bord Pleanála dated the 19th September 2025 stated that under Section 37B (4)(A) that it is the opinion the Board that the Proposed Development falls within the scope of the paragraphs 37A(2)(a) and (b) of the Act. This confirmed that the Proposed Development constitutes SID and therefore the planning application should be made directly to An Bord Pleanála

4.4 Community Consultation

The applicant has undertaken extensive consultation with the local community. The project was first introduced to the local community in April 2023, with the delivery of a letter outlining the Applicant's intention to explore the identified area for a wind energy development. The letter was accompanied with a brochure detailing information about the applicant including contact detail and general information on wind energy. Since the initial engagement in April 2023, the appointed Community Liaison Officer for the project has continued to be available to keep the public informed about the Proposed Project.

Please Refer to Section 2.8.2 of Chapter 2 and Appendix 2-2 of the EIAR for more details in relation to Community Consultation.

4.5 RED III – Completeness Check

On 6 August 2025, the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. No. 274 of 2025) were adopted for the purpose of giving effect to Articles 15e(5), 16, 16b, 16c(2), 16d, 16e and 16f of the RED III Directive.

The legislation introduces new decision timelines (ss.34E, 37JB, 295B): 52 weeks for new wind farms, 30 weeks for repowering projects, and one to two years for IROPI cases (two years for projects over 150 kW, one year for projects under 150 kW or repowering). Importantly, renewable energy developments, including related grid and storage infrastructure, are now presumed to be in the overriding public interest.

Article 16(2) of REDIII provides that for applications for development outside renewable acceleration areas, the competent authority shall acknowledge the completeness of the application within 45 days. Table 2 below outlines the elements of the planning application that should be agreed upon with the planning authority at pre-application stage. Table 3 sets out the necessary items of the 'completeness check'. The 'completeness check' inputs outlined below are set out in the *European Union (Planning and Development) (Renewable Energy) Regulations 2025 Circular (CEPP 1/2025)*[10] and *Renewable Energy Directive (RED) III Information Guide*[11] published by An Coimisiún Pleanála. For the purposes of this Report, an additional 'Note' column has been added to Tables below to provide additional context to An Coimisiún Pleanála. It is the applicant's view that the planning application satisfies the completeness check.

[10] *https://assets.gov.ie/static/documents/20250815_Circular_CEPP_1.2025_re_Transposition_of_REDIII.pdf*
[11] *https://www.pleanala.ie/getattachment/e4ce7afe-5436-4243-a65c-0a10056c9ea5/RED-III-Information-Guide.pdf?lang=en-IE*

Table 2: Pre-application stage requirements

Requirement	N/A	Yes	No	Note
Drawings, maps and plans sufficient to describe the proposed project to the detail required to determine the application, including to an appropriate metric scale or scales, and to an appropriate quality. However, the aim of both parties should be to ensure the number of drawings, maps and plans are sufficient, rather than excessive, and each drawing, map or plan should therefore clearly be seen to perform a discrete function.		X		A drawing schedule, including drawing scales, and sample layouts were provided to ACP for agreement prior to the lodgement of the application. The drawing scales were deemed acceptable through correspondence received from An Coimisiún Pleanála on the 26/09/2025.
The scope of the EIAR. While the planning authority/Commission and the applicant may reasonably decide that each factor of the environment should be addressed by the EIAR, the focus of EIAR should be on those factors of the environment to which the project is likely to pose a significant risk. The prospective applicant, in discussion, should rely on the Commission, with its experience, to provide clear direction on the focus of the EIAR on the key factors of the environment. In this regard both parties should ensure compliance with the EIA Directive and should have regard to the EPA's Guidelines on the Content of EIARs.	X			Part 4: Transitional Provision of S.I. No. 274 of 2025 states the following: *"(2) The amendments made to the Act of 2000 by Regulation 6, 12, 14 and 18 shall only apply in relation to an application or request made to a planning authority or An Coimisiún Pleanála, as the case may be, under section 34, 37E, 146B or 291 of the Act of 2000, on or after 1 October 2025."*
The Commission and the applicant should, subject to the carrying out of stage 1 AA (screening) by the applicant, agree the sites to progress to stage 2 AA, in consultation with the NPWS.		X		The Stage 1 Appropriate Assessment screening concludes that: *It cannot be excluded beyond reasonable scientific doubt, in view of best scientific knowledge, on the basis of objective information and in light of the conservation objectives of the relevant European sites, that the proposed project, individually or in combination with other plans and projects, would be likely to have a significant effect on the Lough Corrib SAC [000297] and Lough Corrib SPA [004042].*

Requirement	N/A	Yes	No	Note
				As a result, an Appropriate Assessment is required, and a Natura Impact Statement has been prepared in respect of the Proposed Project. The Lough Corrib SAC was specifically referenced in correspondence with the NPWS on the 29th May 2023. This correspondence is included in Appendix 2-1 of the EIAR.
Surveys and data – Matters relating to the surveying of habits and species to inform the environmental assessments should be agreed with the Commission at the earliest possible stage of the pre-application process, in consultation with the NPWS. Matters including the duration of surveys, location of surveys and methodologies, having regard to current and developing best practices. The Commission should be notified of any departure from same, accompanied by justification or reasons for it in writing.		X		Surveys included in the current application are listed in section 6.2.3 of the Chapter 6 (Biodiversity) and section 7.2.4 of Chapter 7 (Birds). The full extent of the survey methodologies were detailed in the Environmental Impact Assessment scoping report that was issued directly to Statutory consultees, including the NPWS, in April 2023. These survey methodologies comply with the observations and recommendations made by the NPWS in their correspondence on the 29th May 2023. The applicants met with ACP in June 2023 and July 2025 as part of the pre-application process. No issues or concerns were raised in relation to duration of surveys, location of surveys and methodologies, and having regard to current and developing best practices by ACP. The response received from the NPWS in relation to the scoping report included feedback in relation to bird, bat

Requirement	N/A	Yes	No	Note
				and ecological surveys. The feedback has been incorporated where required into the EIAR. On this basis, it is robustly contended that the application meets the requirements of the completeness test on this aspect.
Policy context – clear justification of the policy context for the proposed development.		X		The Proposed Development is strongly supported by policy at all policy levels. Please see Section 7 of this report for further detail.

Table 3: Completeness Check

Requirement	N/A	Yes	No	Note
Miscellaneous				
Correct Fee Submitted		X		€100,000 paid by EFT
Application Form		X		
Is the application in the Gaeltacht Area			X	
Standalone website provided		X		Standalone project website can be found at the following link - https://www.cooloowfplanning.com/
Two hard copies and 8 soft copies		X		2 no. hard copies and 8 no. soft copies are submitted directly to An Coimisiún Pleanála
Interest of applicant in land		X		Please see letters of consent appended to application form
Public Notices				
Is a full description of the proposed development provided		X		

Is the location of the proposal provided		X		
Is time period and fee for submissions/observations specified		X		
Includes standalone website address		X		
Is Section 37JA referenced		X		
Transboundary environmental effects (if applicable)	X			
If Design Flex Opinion provided, is this referenced (if applicable).		X		
Are the EIAR and NIS referenced		X		
Is site subject to an EPA licence or is an EPA licence required			X	
Are Notices in Irish (If proposal is located within the Gaeltacht)			X	
Documentation – as applicable				
Renewable Energy Designation Policy Statement		X		See section 7.2.4 of this Planning Report
Design Flexibility Compliance Statement		X		Design flexibility sought in this application complies with the design flexibility opinion issued by ACP - See form 22 included in application
Natura Impact Statement with Screening Report		X		
EIAR		X		
Appendices included		X		
Compliance with Article 94 and Schedule 6 of PDR		X		

Survey and methodology requirements clearly outlined		X		
Peat Stability/Landslide Susceptibility investigations undertaken as applicable.		X		
Derogations	X			
Drawings				
Site Location Map		X		
Site Layout Plan – wayleaves shown		X		
Are the Drawing Scales Appropriate		X		These scales have been deemed acceptable through correspondence received from An Coimisiún Pleanála on the 26/09/2025.

5. THE PROPOSED DEVELOPMENT

5.1 Overview

This application under Section 37E of the Act for the Proposed Development includes 9 no. wind turbines and associated infrastructure including, inter alia, handstand areas, underground electrical cabling, a meteorological mast, site entrances and access roads, and other associated temporary works. The applicant is seeking a 10-year planning permission and a 35-year operational life. The full description of the Proposed Development, as per the public notices, is as follows:

i. *9 no. wind turbines with the following parameters:*
   Total turbine tip height of 180 metres;
   A rotor blade diameter of 150 to 162 metres;
   A hub height of 99 to 105 metres;
ii. *Permanent turbine foundations, hard-standing and assembly areas;*
iii. *Underground electrical (33kV) and communications cabling;*
iv. *1 no. temporary construction compound (including site offices and welfare facilities);*
v. *A meteorological mast with a height of 100 metres, security fencing and associated foundation and hard-standing area;*
vi. *1 no. new site entrance on the R332 in the townland Lisavally;*
vii. *1 no. new access and egress point off the L6056 Local Road in the townland of Dangan Eighter;*
viii. *1 no. new access and egress point on to an existing access track in the townland of Dangan Eighter;*
ix. *2 no. new access and egress points off the L6301 Local Road in the townland of Cooloo and Lecarrow;*
x. *Upgrade of existing site tracks/roads and provision of new site access roads, clear span crossings, junctions and hard-standing areas;*
xi. *A new temporary access road from N63 national road and to R332 Regional Road in the townland of Slievegorm to facilitate the delivery of turbine components and other abnormal sized loads;*
xii. *Demolition of an existing derelict house and adjacent outbuilding in the townland of Cooloo;*
xiii. *Peat and Spoil Management Areas;*
xiv. *Tree felling and hedgerow removal;*
xv. *Biodiversity Management and Enhancement measures;*
xvi. *Site Drainage;*
xvii. *Operational Stage site signage; and*
xviii. *All ancillary apparatus and site development works above and below ground, including soft and hard landscaping.*

5.2 Project Design Process

The design of the Proposed Development has been an informed and collaborative process from the outset, involving the project designers, engineers, environmental, ecological, ornithological, hydrological, geotechnical, and traffic consultants and archaeological specialists. The design process has also considered recommendations and comments of the relevant statutory and non-statutory organisations, the local community and the local authority where relevant.

The aim of the process being to reduce the potential for environmental effects while designing a commercially viable project capable of being constructed.

Throughout the design process, the layout of the Proposed Development has been revised and refined to take account of the findings of all desk-based assessments, site surveys/ investigations and baseline assessments which have brought the design from its first initial layout to the current proposed layout.

5.2.1 Strategic Site Selection

Given the significant investment required to progress any wind energy project, it is critical that the most suitable site for the Proposed Development is chosen. The selection of a site for the development of a wind farm necessitates an evaluation of a site's characteristics, based on multiple criteria, including:

- **Planning Policy:** Site location relative to GCDP Wind Energy Classification of areas considered that have capacity for wind farm development from a planning policy perspective (the Application Site was, at the time of site selection, entirely classified as – "Open to Consideration")
- **Environmental Sensitivities**: Located outside areas designated for protection of ecological species and habitats;
- **Grid Connection**: Access to the national electricity grid possible within a viable distance;
- **Sensitive Receptors**: Capable of complying with required setbacks from sensitive receptors;
- **Site Scale:** Sufficient area of unconstrained land that could potentially accommodate a wind farm development and turbine spacing requirements.

5.2.2 Detailed Constraints and Facilitators Mapping

The design and layout of the Proposed Development have been developed in accordance with the principles and recommendations contained in the *Wind Energy Development Guidelines* (Department of the Environment, Heritage and Local Government, 2006) and the *Best Practice Guidelines for the Irish Wind Energy Industry* (Irish Wind Energy Association, 2012).

The 2006 *Wind Energy Development Guidelines* were subject to a targeted review in 2013. More recently, proposed updates to the development management standards for onshore wind energy have been set out in the *Draft Revised Wind Energy Development Guidelines* (Department of Housing, Planning and Local Government, December 2019). Public consultation on the draft 2019 Guidelines concluded on 19 February 2020; however, at the time of writing these have not yet been formally adopted. CAP25 indicates that new draft guidelines were intended for adoption in Q1 2025. Until such time as they are in place, the 2006 Guidelines remain the relevant statutory guidance under Section 28 of the Act.

An initial layout of 9 no. turbines was prepared following a preliminary desk-based constraints assessment. This was subsequently refined through a detailed constraints mapping exercise, which informed the final turbine arrangement. The mapping process involved applying buffer zones (separation distances) around identified constraints to define exclusion areas where development cannot occur. The buffer distances were determined in line with the standards set out in the guidance documents referenced above. The site-specific constraints mapping addressed the following key constraints and associated buffer requirements:

- **Sensitive Receptors:** Residential dwellings plus a minimum 720 metre buffer (meeting the requirement of 4 x maximum tip height separation distance as required by the draft 2019 Guidelines. Although not adopted, the developer has applied the setback in this instance as it is considered best practice.) (Refer to Chapter 5 Population and Human Health of EIAR);
- **Designated Sites:** Natura 2000 sites plus 100 metre buffer
- **Habitats and Biodiversity:** Siting of infrastructure so as to minimise loss of habitats of Local Importance (higher value) and higher.
- **Hydrology:** Watercourses and waterbodies plus 50 metre buffer
- **Archaeology:** Recorded Archaeological Sites and Monuments/Protected Structures plus 50 metre buffer
- **Telecommunications:** Telecommunication Links plus operator specific buffer

Facilitators at the site build on the existing advantages and include the following:

- Available lands for development;
- Good wind resource;
- Existing access points and general accessibility of all areas of the site due to existing road infrastructure, and;
- Limited extent of constraints.

Following the identification and mapping of all known constraints, the project team undertook detailed site investigations. The ecological appraisal included habitat mapping and comprehensive surveys of avifauna and other fauna species. These findings, as set out in Chapter 6 (Biodiversity) and Chapter 7 (Ornithology) of this EIAR, directly informed turbine siting decisions and the planning of associated works, such as access road construction.

Hydrological and geotechnical investigations were also carried out at the proposed locations for turbines, roads, and other key components of the Proposed Project, including the substation and the temporary construction compound. Where particular areas were found to be unsuitable, for example, due to the presence of sensitive habitats, unmapped watercourses, or poor ground conditions, alternative locations within the site were identified and assessed, with regard to the areas previously excluded from development.

In addition, the turbine layout was refined based on wind resource data, as well as the outcomes of noise and shadow flicker assessments, which were integrated into the overall design process as results became available.

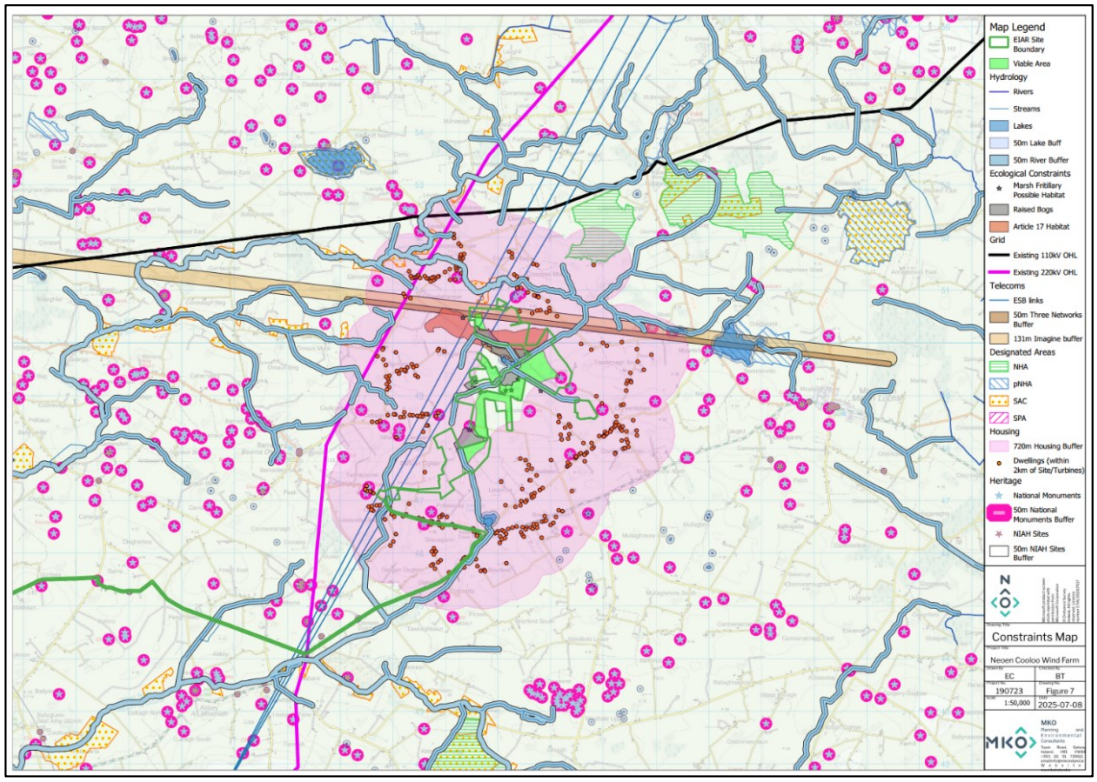

Figure 1: Constraints and Facilitators map

5.2.3 Turbine Layout Design Process

The Proposed Development has undergone a comprehensive design process, commencing with the identification of constraints through desk-based analysis and initial site surveys. As subsequent site surveys and further analyses were conducted, adjustments were made to the design to avoid new constraints identified following these surveys. The Proposed Development underwent several design iterations, as shown in Figure 5-2 below. The final design is regarded as optimal as identified constraints are avoided while also maximising the site's development potential. Further details of the design process and a selection of design iterations can be found in Chapter 3 of the EIAR.

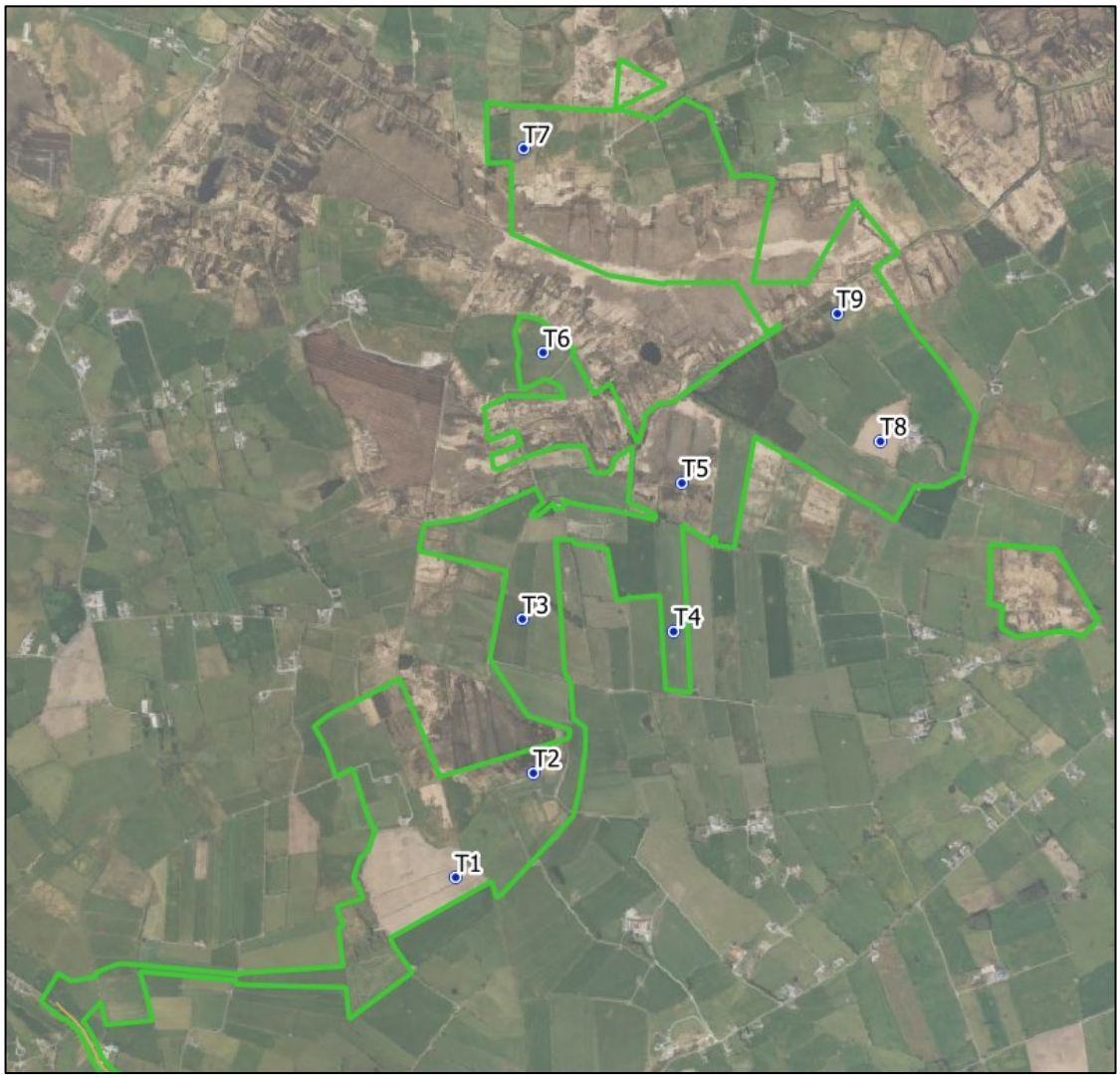

Figure 2: Iteration 3 Turbine Layout Design

6. LEGISLATIVE CONTEXT

6.1 Planning and Development Act 2000 (as amended)

This planning application for the Proposed Development is being made pursuant to Section 37E of the Act. Section 37E provides the statutory framework for the assessment of applications for strategic infrastructure development (SID) which, by reason of their nature and scale, are of strategic economic or social importance to the State or the region concerned. Threshold for SID infrastructure is established in the 7th Schedule of the Act. The relevant threshold established in the 7th Schedule for the Proposed Development provided below:

"An installation for the harnessing of wind power for energy production (a wind farm) with more than 25 turbines or having a total power output greater than 50MW".

Along with meeting the threshold established in the 7th Schedule, one or more of the following criteria, set out under Section 37A(1) of the Act, must be satisfied.

i. *be of strategic economic or social importance to the State or the region in which it would be situate,*
ii. *contribute substantially to the fulfilment of any of the objectives of the National Planning Framework or of any regional spatial and economic strategy, or*
iii. *have a significant effect on the area of more than one planning authority,*

The Proposed Development exceeds the 7th Schedule threshold and meets the criteria set out under Section 37A(1) of the Act.

In accordance with Section 37B of the Act, the Applicant engaged in pre-application consultations with An Coimisiún Pleanála in order to determine whether the Proposed Development constituted a SID project. Following consideration of the submissions made and the nature, scale and characteristics of the Proposed Development, the Commission formed the opinion, under Section 37A(2), that the Proposed Development does fall within the definition of strategic infrastructure development within the meaning of the Act. The Commission served notice of their opinion under Section 37B(4)(a) on the 19th of September 2025.

Accordingly, pursuant to Section 37E(1) of the Act, the application for permission for the Proposed Development is being made directly to An Coimisiún Pleanála.

Requirement for EIAR

The EIA Directive 2011/92/EU, as amended (the 'EIA Directive'), has been incorporated into Irish law primarily through the Planning Act and the Planning and Development Regulations 2001, as amended ('the Regulations').

Part 2 of Schedule 5 of the Regulations identifies classes and scales of development that require Environmental Impact Assessment (EIA). The relevant class of development in this case relates to "*installations for the harnessing of wind power for energy production (wind farms) with more than 5 turbines or having a total output greater than 5 megawatts*", as per Item 3(i) of the Schedule. The Proposed Cooloo Wind Farm exceeds 5 Megawatts in scale and proposes more than 5 turbines and therefore is subject to EIA. As an integral part of the Proposed Cooloo Wind Farm project, the application for the Proposed Development is accompanied by an EIAR.

Requirement for AA / NIS

The Habitats Directive (92/43/EEC) and Birds Directive (2009/147/EC) are fundamental components of the European Union's nature conservation policy, aimed at safeguarding habitats and species of significant European importance. The Habitats Directive facilitates the establishment and conservation of the Natura 2000 network, an EU-wide collection of protected sites. This network comprises Special Areas of Conservation (SAC) designated under the Habitats Directive and Special Protection Areas (SPA) designated under the Birds Directive. Under the Planning Act Section 177R, a 'European Site' means a candidate site of Community importance, a site of Community importance, a candidate special area of conservation, a special area of conservation, a candidate special protection area or a special protection area.

Article 6(3) of the Habitats Directive sets out the requirement for an Appropriate Assessment (AA) of any plan or project that is not directly related to the management of a protected site but is likely to have a significant effect on it. This assessment evaluates the potential implications for the site in light of its conservation objectives. Competent authorities are mandated to grant development consent only if it is ascertained that a proposed project will not adversely affect the integrity of the site concerned or if it will, if there are imperative reasons of overriding public interest why it should proceed, and the relevant criteria is met.

Under Section 177U of the Planning and Development Act (as amended), the legal requirements pertaining to AA set out in Part XAB of the Planning Act, apply to this application for development permission under Section 37E. This application for development permission is therefore accompanied by an AA Screening Report and a Natura Impact Statement (NIS).

6.2 Climate and Renewable Energy Legislation

6.2.1 European Legislation

The Renewable Energy Directive (RED) is the EU's legal framework for the development of renewable energy across all sectors of the EU economy, supporting clean energy cooperation across EU countries. Since its adoption in 2009, the RED has evolved through three major iterations-RED I (2009), RED II (2018), and RED III (2023)-each raising ambition to support decarbonisation and energy security.

Under RED I, Member States were legally required to meet a 20% share of renewables in final energy consumption by 2020. RED II increased this target to 32% by 2030. Most recently, RED III, which entered into force in November 2023, raised the target further to 42.5% by 2030, with an indicative ambition of 45%, in line with the REPowerEU Plan.

A key feature of RED III is its legal requirement for Member States to identify and establish renewables acceleration areas, where projects-including related grid infrastructure-can benefit from simplified and fast-track permitting. This aims to overcome permitting delays, which have left an estimated 80 GW of wind power stalled across Europe.

Critically, RED III enshrines the presumption that renewable energy developments and associated grid infrastructure are in the "*overriding public interest*", particularly when weighed against competing interests under EU environmental law (e.g. the Habitats, Birds, and Water Framework Directives). Article 16(f) of the Directive requires that such developments be prioritised in legal and regulatory processes, a provision that Member States must implement by July 2024.

Despite this requirement, Ireland has not yet fully transposed RED III's permitting provisions into national law, prompting the European Commission to issue an infringement notice in September 2024. This underscores the urgency of accelerating renewable deployment and supporting infrastructure in the Irish context. In August 2025, some of the provisions of RED III were transposed into national law through the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I.

No. 274 of 2025). This legislation was adopted for the purpose of giving effect to Articles 15e(5), 16, 16b, 16c(2), 16d, 16e and 16f of the RED III Directive.

The legislation introduces new decision timelines and a "completeness check" procedure (see section 4.5 of this report). The timeline for the decision process for the Proposed Development is 52 weeks. Importantly, renewable energy developments, including related grid and storage infrastructure, are now presumed to be in the **overriding public interest.**

In order to ensure that the RED III target of 42.5% is achieved, EU Member States must notify their climate and energy objectives, targets, policies, and measures to the European Commission and were established under Regulation (EU) 2018/1999 of the European Parliament and of the Council on the Governance of the Energy Union and Climate Action ('the Governance Regulation')[12]. The Department of the Environment, Climate and Communications (DECC) submitted an updated National Energy and Climate Plan (NECP) 2021-2030 to the European Commission in July 2024. The updated NECP committed to achieving a 43% share of renewable energy in total energy consumption by 2030. In the trajectories set out in the updated NECP, it states that Ireland's proposed trajectory will not be in line with the desired trajectory set out in the Governance Regulation.

Given that Ireland had the lowest share of renewables in energy consumption among EU Member States 2023[13] (15.3%), the implementation of RED III represents both a legal obligation and an opportunity to remove procedural bottlenecks that hinder critical infrastructure, such as the Proposed Development.

6.2.2 National Legislation

The Climate Action and Low Carbon Development 2015 (as amended) ('the Climate Act') establishes a legislative precedent to reduce Ireland's carbon emissions. The Climate Act legally binds Ireland to achieve net-zero emissions no later than 2050, and to a 51% reduction in emissions by the end of this decade.

The Climate Act also incorporates the following key provisions:

- Embeds the process of setting binding and ambitious emissions-reductions targets in law;
- Provides for a national climate objective, which commits to pursue and achieve no later than 2050, the transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy;
- Provides that the first two five-year carbon budgets proposed by the Climate Change Advisory Council should equate to a total reduction of 51% over the period to 2030, relative to a baseline of 2018;
- The role of the Climate Change Advisory Council has been strengthened;
- The government must adopt carbon budgets that are consistent with the Paris agreement and other international obligations;
- Actions for each sector will be detailed in the Climate Action Plan which must be updated annually; and
- Local Authorities must prepare individual Climate Action Plans which will include both mitigation and adaptation measures and will be updated every five years.

The National Climate Policies and Objectives all support the Proposed Development, and by implication the consenting, subject to proper planning, of renewable energy developments.

[12] *Regulation (EU) 2018/1999 of the European Parliament and of the Council on the Governance of the Energy Union and Climate Action, available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32018R1999*
[13] https://ec.europa.eu/eurostat/databrowser/view/nrg_ind_ren/default/table?lang=en

6.2.2.1 Legal Obligations of An Coimisiún Pleanála

ACP will be aware of certain legal obligations in respect of the processing of certain planning applications for renewable energy developments, in particular:

- Certain obligations under the Climate Action and Low Carbon Development Act 2015 (as amended) (the 'Climate Act') imposed on the Commission when exercising its decision-making functions in relation to planning applications for renewable energy developments.
- Certain discretionary powers under the Planning and Development Act 2000 (as amended) (the 'Planning Act') which must be exercised subject to the mandatory obligations set out in the Climate Act when the Commission is exercising its decision-making functions in relation to planning applications for renewable energy developments.

Specifically, Section 15(1) of the Climate Act provides that:

"A relevant body shall, in so far as practicable, perform its functions in a manner consistent with-

- *the most recent approved climate action plan,*
- *the most recent approved national long term climate action strategy,*
- *the most recent approved national adaptation framework and approved sectoral adaptation plans,*
- *the furtherance of the national climate objective, and*
- *the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State." (the 'National Climate Policies and Objectives')"*

The above requirement is a mandatory obligation.

The National Climate Policies and Objectives listed in section 15, with which ACP must comply, all support the development of onshore wind energy in accordance with proper planning and sustainable development.

The recent judgement of the High Court delivered on 10th January 2025 provides clarity on the obligations imposed on public bodies under section 15 of the Climate Act (*Coolglass Wind Farm Limited v An Coimisiún Pleanála [2025] IEHC 1*). Mr Justice Humphreys undertook a detailed consideration of the interpretation of section 15 of the Climate Act and concluded that, when deciding upon an application relevant to the achievement of climate plans and objectives under S.15 of the 2015 Act, relevant bodies, in this case ACP, is required to:

1. Consider which option available to it as the decision maker, grant or refuse permission, would contribute to achieving Ireland's climate targets and the wider objectives of section 15 – which Mr Justice Humphreys went on to conclude "*in the case of renewable energy projects, the answer the answer to that will almost always be a grant of permission*".

2. Consider whether granting permission is *"precluded by a mandatory and non-fixable legal requirement"* that does not grant the decision maker any discretion or evaluative judgment in reaching an outcome favouring climate goals, i.e. a grant of permission.

3. If the decision maker is not precluded from granting permission, then how can the planning authority use its evaluative judgement and discretion to reach an outcome favouring these policy goals.

The Proposed Development will generate clean, renewable energy. For this reason, it is clear that the proposed development, if granted, would contribute to climate targets.

There are no mandatory and non-fixable legal requirements that prevent the Commission from reaching an outcome, in relation to the Proposed Development, that favours policy goals, i.e. granting permission. The Proposed Development is supported by local, regional and national policy and has been designed

in accordance with national guidance and best practice. It has also been demonstrated, in the EIAR and NIS, that the Proposed Development will not give rise to any significant effect on the environment or have an adverse effect on the integrity of European Sites. With these matters considered, it is respectfully submitted that the Commission is obliged to exercise their evaluative judgement to reach an outcome favouring policy goals, in accordance with their obligation under S.15 of the Climate Act and grant permission.

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

7. PLANNING POLICY APPRAISAL

The following section provides a summary of the planning, renewable energy and climate policy context relevant to the Proposed Development. A more detailed and comprehensive breakdown of planning policy at all levels is set out in **Chapter 2** of the EIAR.

It is clear from the policies outlined below that the Proposed Development is strongly supported in principle by policy at all levels, except for the unfavourable wind energy zoning that applies to a small portion of the site, which is comprehensively addressed within this Planning Report and throughout the EIAR. The following section contains a synopsis of the current policies in place and their relevance to the Proposed Development.

The Proposed Development sits within a policy framework characterised by several recent crises, which have significantly influenced policy changes in recent years. These crises have heightened the imperative to transition towards a renewable energy-focused electricity grid and have emphasised the necessity for diversifying our energy sources.

7.1 International, National and Regional Planning Policy

7.1.1 International Policy

Paris Agreement

On an international level, Ireland is a signatory of the Paris Agreement, a global initiative adopted in 2015 that aims to address climate change by limiting global warming to well below 2 degrees Celsius above pre-industrial levels, with efforts to limit the increase to 1.5 degrees Celsius. Under the Paris Agreement, countries submit Nationally Determined Contributions (NDCs), outlining their individual climate action plans and commitments. Ireland's contribution comes under the European Union's (EU) NDCs targets and is based on the European Union's 2030 emissions reductions targets.

European Green Deal

On a European level, the European Green Deal, initially introduced by the European Commission in December 2019, sets out the 'blueprint' for a transformational change of the 27-country bloc from a high- to a low-carbon economy. The European Green Deal is intended to work through a framework of regulation and legislation setting clear overarching targets, e.g. a bloc-wide goal of net zero carbon emissions by 2050 and a 55% cut in emissions by 2030 (compared with 1990 levels). This is a substantial increase compared to the existing target, upwards from the previous target of at least 40% (2030 Climate & Energy Framework), and furthermore, these targets demonstrate the ambition necessary to keep the global temperature increase to well below 2°C and pursue efforts to keep it to 1.5°C as per the Paris Agreement.

The EU Fit for 55

The EU Fit for 55 package was published in late 2021 with the aim of reducing EU emissions by at least 55% by 2030 compared to 1990 levels and making the EU carbon-neutral by 2050. This EU package is a set of proposals to revise all existing EU acts on climate and energy and increase the EU target for renewables in the overall energy mix from 32% in 2030 to 40%.

Renewable Energy Directive & REPowerEU

In November 2023, a revision of the Renewable Energy Directive[14] (RED III), came into force. RED III increases the EU wide renewable energy target from 32% set under the previous revision of the directive to at 42.5%, with an ambition to reach 45% by 2030. This increase comes following the Russian invasion of Ukraine and the publication of REPowerEU plan in May 2022. REPowerEU aims to make Europe independent from Russian fossil fuels including oil and gas by rapidly transitioning to renewable energy. The plan aims to accelerate the scale up of renewables by speeding up the permitting process and placing renewable energy developments in the category of overriding public interest.

7.1.2 National Policy

Climate Action and Low Carbon Development Act 2015 (as amended)

At a national level, the Climate Act brought into law for the first time the requirement for the State to reduce its carbon emissions by 51% by 2030 and climate neutrality by 2050. Under Section 15 of the Climate Act public bodies are required to, in so far as practical, perform its functions in a manner consistent with CAP 25, the National Energy & Climate Plan 2021 – 2030 and other national climate mitigation and adaptation plans.

Climate Action Plan 2025

Originally published in 2019 and subsequently revised in 2021, 2023, 2024 and 2025 the Climate Action Plan (CAP) underscores the growing imperative to increase the presence of renewable energy generators on the national grid.

CAP 25 represents the third statutory update to Ireland's climate roadmap under the Climate Act. Building on the foundations laid by previous plans, CAP25 refines and strengthens the strategies necessary to deliver Ireland's legally binding carbon budgets and sectoral emissions ceilings. It sets out a clear trajectory to reduce greenhouse gas emissions by 51% by 2030 and to achieve climate neutrality no later than 2050.

A cornerstone of CAP25 is the decarbonisation of Ireland's electricity system through a substantial increase in renewable energy generation. The plan reaffirms ambitious targets for renewable electricity share which includes 80% by 2030, and 50% by 2025. This is to be achieved through the accelerated deployment of onshore wind (2 GW by 2025; 9 GW by 2030), offshore wind (8 GW by 2030), and solar energy (up to 5 GW by 2025; 8 GW by 2030).

National Development Plan 2021 – 2030

The National Development Plan 2021 – 2030 (NDP) sets out the major public investment projects identified by Government which are to play a significant role in addressing the opportunities and challenges faced by Ireland over the coming years such as housing, health, population growth, and most relevant to the subject development, climate change. It is stated that the NDP will be the *'largest and greenest ever delivered in Ireland'*, and in this regard, the NDP highlights that extensive consultation was undertaken to ensure that the plan adequately supports the implementation of climate action measures.

One of the NDP's strategic climate priorities in the need for low-carbon, resilient electricity systems; specifically, the plan commits to increasing the share of renewable electricity up to 80% by 2030. This is characterised by the NDP as an '*unprecedented commitment to the decarbonisation of electricity supplies'*, which is certainly an ambitious and an explicit driver for the deployment of new renewable

[14] *Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (recast)*

generators such as the Proposed Development. The focus of investment in renewable energy infrastructure is to contribute to a long-term, sustainable and competitive energy future for Ireland.

The NDP is clear in its priority to reach a low-carbon, climate resilient society over the lifetime of the plan.

National Planning Framework First Revision (2025)

On the 8t h April 2025, the Government approved the National Planning Framework First Revision (Revised NPF) which was subsequently passed through both Houses of the Oireachtas. The Revised NPF aims to address changes that have occurred in Ireland since 2018.

The Revised NPF provides an updated projection for the population of Ireland, with the population expected to increase to 6.1 million by 2040. This population growth will place further demand on both the built and natural environment, and subsequently, the services required to meet said demands.

Regional Renewable Energy Capacity Allocations have been introduced under the Revised NPF. This was one of the key actions for CAP24 and is supported under CAP25. The Northern and Western Region, in which the Proposed Development is located, is allocated a target of installing an **additional 1,389 MW of onshore wind energy, by 2030.**

Under **NPO 74** Regional Assemblies are required to plan for the delivery of the regional renewable electricity capacity allocations outlined in the Revised NPF and identify allocations for each of the local authorities within their RSES. Furthermore, **NPO 75** requires Local Authorities to plan for the delivery of Target Power Capacity (MW) allocations consistent with the relevant RSES, through their City and County Development Plans. At the time of writing, no local Target Power Capacity allocations have been established, however it is clear from the regional allocation that the Northern and Western region is set to deliver a significant amount of onshore wind energy in the coming years.

The introduction of renewable energy targets represents a more active and prescriptive approach to land use planning for renewable energy development. The Revised NPF aligns the national target of 9GW of onshore wind energy with the policies and objectives of Local Authorities. Regarding this, it is clear that the provision of new renewable energy generation through the Proposed Development is in line with aims and objectives of the Revised NPF, which seeks to transition to a carbon neutral economy.

National Energy Security Framework

The National Energy Security Framework (NESF), adopted in 2022, and implements many of the aims and objectives of REPowerEU on a national level, reinforcing the State's requirement to urgently diversify away from imported fossil fuels and accelerate the roll out of renewables. The NESF is supported by the recently published Energy Security Package 'Energy Security in Ireland to 2030'. The Energy Security Package provides further long-term energy security measures which includes the prioritisation of achieving a renewables-led energy system.

Programme for Government – Securing's Ireland's Future (January 2025)

The Programme for Government 2025 – Securing Ireland's Future (January 2025) places specific emphasis on climate change, recognising that time is critical in addressing the climate crisis. The Programme states that the Government is committed to taking *"decisive action to radically reduce our reliance on fossil fuels and to achieve a 51% reduction in emissions from 2018 to 2030, and to achieving net-zero emissions no later than 2050".*

The Programme states that the next ten years are a critical period in addressing the climate crisis, and therefore, a deliberate and swift approach to reducing more than half of Ireland's carbon emissions over the course of the decade (2020-2030) must be implemented. The programme states that the Government

are committed to reducing Greenhouse Gas emissions by an average 7% per annum over the next decade in a push to achieve a net zero emissions by the year 2050.

Regarding renewable energy generation, the Programme notes that the Government is committed to the rapid decarbonisation of the energy sector. The Programme states the Government's ongoing support and commitment to take "*the necessary action to deliver at least 70% renewable electricity by 2030*". This target has been updated by subsequent Climate Action Plans.

Wind Energy Development Guidelines 2006

In June 2006, the then Department of Environment, Heritage and Local Government (DoEHLG) published the Wind Energy Development Guidelines (the Guidelines (DoEHLG, 2006)) under Section 28 of the Act. The aim of the Guidelines was to assist the proper planning of wind power projects in appropriate locations around Ireland. The Guidelines also highlight general considerations in the assessment of all planning applications for wind energy. They set out advice to planning authorities on planning for wind energy through the development plan process and in determining applications for planning permission. They contain guidelines to ensure consistency of approach throughout the country in the identification of suitable locations for wind energy development.

Draft Wind Energy Development Guidelines 2019

The Department of Housing, Planning and Local Government (DoHPLG) published the draft Revised Wind Energy Development Guidelines (the Draft Guidelines (DoHPLG, 2019)) in December 2019. A consultation process in relation to the Draft Guidelines concluded on the 19th of February 2020. A further review of the Draft Guidelines is currently underway by the Department of Housing, Local Government and Heritage (DoHLGH) and the Department of Environment, Climate and Communications (DoECC), particularly in relation to noise limits. Since the publication of the Draft Guidelines there have been significant changes in national policy regarding renewable energy targets, giving further impetus to the importance of the further review. The Draft Guidelines set out that that the proper planning and sustainable development of areas and regions must be considered when local authorities prepare their development plans and assess planning applications, irrespective of the significant role renewable energy has to play in tackling climate change.

7.1.3 Regional Policy Context

The Northern and Western Regional Assembly

The Northern and Western Regional Assembly (NWRA) has a recognised leadership role in setting out regional policies and coordinating initiatives which support the delivery and implementation of the National Planning Framework. The primary vehicle for this is the preparation and implementation of the Regional Spatial and Economic Strategy.

The North and Western region is characterised by the RSES as having '*a unique natural endowment of ample carbon-neutral, energy supplies*' such as wind. Specifically, the Western Region is stated as being *'particularly rich'* in renewable energy resources dispersed across the region. The RSES acknowledges that the region has a pivotal role in delivering a successful transition to Ireland's proposed low carbon economy with huge potential for growth in renewables. As such, there is '*still significant potential*' for all new renewable energy outputs to the grid. In order to facilitate the growth of renewables within the region, the RSES notes that the NWRA aims to encourage stakeholders, i.e. industry, commercial etc., to be the first to facilitate new opportunities and concentrate on possibilities to further advance renewable energy generation and use.

These strategic aims are captured in Policy Objectives 4.16, 4.17 and 4.18:

- ***RPO 4.16****: The NWRA shall co-ordinate the identification of potential renewable energy sites of scale in collaboration with Local Authorities and other stakeholders within 3 years of the adoption of the RSES. The identification of such sites (which may extend to include energy storage solutions) will be based on numerous site selection criteria including environmental matters, and potential grid connections.*

- ***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, including:*
    - *Stimulating the development and deployment of the most advantageous renewable energy systems;*
    - *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; and*
    - *Encourage the development of the transmission and distribution grids to facilitate the development of renewable energy projects and the effective utilisation 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.*

The Regional Policy Objectives above reflect the strong support for renewable energy throughout the RSES. The Proposed Development will generate renewable electricity contributing to the achievement of these objectives. The Proposed Development is therefore in alignment with and strongly supported by the policies of the RSES.

7.2 Local Policy Context

The Galway County Development Plan 2022 – 2028 was adopted by the Elected Members of Galway County Council at the conclusion of the Special Meeting on the 9th of May 2022 and came into effect on the 20th of June 2022. The GCDP provides the framework within which the decision on the planning application is made.

The policies and objectives set out within the GCDP are supportive of the development of renewable energy within the county. Climate change is emphasised as one of the greatest global challenges with Galway County Council acknowledging that continual action is needed for Galway to become a low carbon and climate resilient county.

The GCDP recognises that an efficient and secure energy supply is essential to the future growth and sustainable development of County Galway:

> *"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."*

The GCDP also includes policies and objectives relating to Natural Heritage, Biodiversity, Green/Blue Infrastructure, Landscape, Archaeology, Hydrology, Flooding, Noise, and Soils and Geology. A statement of consistency is provided in Table 4 below with each of the GCDP policies /objectives that are relevant to the Proposed Development. In conclusion, it is considered that the Proposed Development is in compliance with all the relevant policies set out in the GCDP and is therefore in accordance with the proper planning and sustainable development of the area.

Table 4: Local Policy Objectives and Compliance Summary

Topic	Policy / Objective	Compliance
Climate Change	**CC 1 Climate Change** Support and facilitate the implementation of European, National and Regional objectives for climate adaptation and mitigation considering 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.	The Proposed Development will provide renewable energy to the national electricity grid, contributing to towards renewable energy targets at a European, National and Regional level, thereby facilitating climate mitigation through reducing carbon emissions.
	CC 2 Transition to a low carbon, climate-resilient society 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, by way of reducing greenhouse gases, increasing renewable energy, and improving energy efficiency.	Decarbonising our economy is reliant on the production of clean, renewable energy and the electrification of other carbon intensive sectors. The Proposed Development will increase the level of clean renewable energy on the national electricity grid.
	CC 3 County Galway Climate Adaptation Strategy 2019-2024 To implement the County Galway Climate Adaptation Strategy 2019-2024 as appropriate.	The County Galway Climate Adaptation Strategy identifies the impacts of climate change on County Galway. The Proposed Development will aid decarbonisation measures in the County and is therefore in line with the aims of the Adaptation Strategy.
	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.	It is submitted that the Proposed Development is suitably sited with regards to the Galway Renewable Energy Strategy. Please refer to Section 7.2.4 for an assessment of the Proposed Development against the provisions of the Renewable Energy Strategy.
Renewable Energy	**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.	The Proposed Development has the potential to generate between 54MW and 64.8MW of renewable energy which will be transferred to the National Grid. This will aid in achieving the climate change and renewable energy objectives at a National and International level and the transition to a low carbon economy.
	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	The Proposed Development site is located in an area designated as 'Open to Consideration' (6 no. turbines) and 'Generally to be Discouraged' (3 no. turbines) on the wind energy zoning map.

	deemed the policy objectives and development management standards for the purpose of the Galway County Development Plan 2022-2028.	Therefore, the Proposed Development should be assessed in accordance with LARES policy objective 16 and 17; to assess wind farms in these areas in accordance with proper planning and sustainable development. It is submitted that the Proposed Development is in accordance with the proper planning and sustainable development of the area. A full analysis of the Local Authority Renewable Energy Strategy is included in Section 7.2.4 of this report.
	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.	The Proposed Development adheres to the Guidelines in its design and has been designed to be capable of adhering with the Draft Guidelines. The EIAR accompanying this application considers all relevant potential environmental impacts that could arise (Chapter 5 of the Guidelines), and the design of the Proposed Development has followed the design principles established in Chapter 6 of the Guidelines. It is expected that, were the Draft Guidelines to come into effect, the Proposed Development will be able to achieve any revised noise and shadow flicker standards. However, without the final, adopted guidelines, the exact compliance procedures cannot be confirmed at this stage. It is important to highlight that the Proposed Development maintains a four times tip height setback between turbines and sensitive receptors, and a thorough community consultation effort has been conducted. It is submitted that the Proposed Development is suitably sited with regards to the Galway Renewable Energy Strategy. Please refer to Section 7.2.4 for an assessment of the Proposed Development against the provisions of the Renewable Energy Strategy.
	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	It is submitted that the Proposed Development is suitably sited and is consistent with the policies, objectives and development management criteria set out in the LARES. Please refer to Section

	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.	7.2.4 for an assessment of the Proposed Development against the provisions of the Renewable Energy Strategy and to the NIS which provides a full assessment of the Proposed Project in accordance with the Habitats Directive.
	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 Proposed Development will increase the level of renewable energy generated, reducing the county's dependence on fossil fuels.
Natural Heritage, Biodiversity and Green/Blue Infrastructure	**NHB 1 Natural Heritage and Biodiversity of Designated Sites, Habitats and Species** Protect and where possible enhance the natural heritage sites designated under EU Legislation and National Legislation (Habitats Directive, Birds Directive, European Communities (Birds and Natural Habitats) Regulations 2011 and Wildlife Acts) and extend to any additions or alterations to sites that may occur during the lifetime of this plan. Protect and, where possible, enhance the plant and animal species and their habitats that have been identified under European legislation (Habitats and Birds Directive) and protected under national Legislation (European Communities (Birds and Natural Habitats) Regulations 2011 (SI 477 of 2011), Wildlife Acts 1976-2010 and the Flora Protection Order (SI 94 of 1999). Support the protection, conservation and enhancement of natural heritage and biodiversity, including the protection of the integrity of European sites, that form part of the Natura 2000 network, the protection of Natural Heritage Areas, proposed Natural Heritage Areas, Ramsar Sites, Nature Reserves, Wild Fowl Sanctuaries (and other designated sites including any future designations) and the promotion of the development of a green/ ecological network.	The planning application considers the impact on protected sites, habitats and species. The NIS provides an assessment of all potential direct or indirect adverse effects on European Sites. The NIS objectively concluded that the Proposed Project, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site.

	NHB 2 European Sites and Appropriate Assessment To implement Article 6 of the Habitats Directive and to ensure that Appropriate Assessment is carried out in relation to works, plans and projects likely to impact on European sites (SACs and SPAs), whether directly or indirectly or in combination with any other plan(s) or project(s). All assessments must be in compliance with the European Communities (Birds and Natural Habitats) Regulations 2011. All such projects and plans will also be required to comply with statutory Environmental Impact Assessment requirements where relevant.	The planning application includes an Appropriate Assessment prepared in line with the Birds and Natural Habitats Regulations 2011.
	NHB 3 Protection of European Sites No plans, programmes, or projects etc. giving rise to significant cumulative, direct, indirect or secondary impacts on European sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan (either individually or in combination with other plans, programmes, etc. or projects.	The impact of the Proposed Wind Farm on designated sites is considered in full in the NIS. The NIS objectively concluded that the Proposed Project, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site.
	NHB 4 Ecological Appraisal of Biodiversity Ensure, where appropriate, the protection and conservation of areas, sites, species and ecological/networks of biodiversity value outside designated sites. Where appropriate require an ecological appraisal, for development not directly connected with or necessary to the management of European Sites, or a proposed European Site and which are likely to have significant effects on that site either individually or cumulatively.	As detailed in Chapter 6 of the EIAR, it is concluded that the Proposed Project will result in a residual significant effect on the KER Raised Bog (PB1) *Degraded Raised Bogs Still Capable of Natural Regeneration (7120)* in the form of the direct loss of approximately 0.18ha of this habitat as a result of the proposed new floating access road between T7 and T9. No further significant residual effects on features of International, National, County Importance or Local importance (higher value) were identified. As detailed in the Bat Report in Appendix 6-2 of the EIAR, provided that the Proposed Project is constructed and operated in accordance with the design, best practice and mitigation that is described within the report, the Proposed Project is not expected to result in significant effects on bats at any geographic scale.

		As detailed in Appendix 7-6 of the EIAR, the Collision Risk Assessment concludes that with successful implementation of the mitigation plan, no significant effects of collision risk are anticipated.
	NHB 5 Ecological Connectivity and Corridors Support the protection and enhancement of biodiversity and ecological connectivity in non-designated sites, including woodlands, trees, hedgerows, semi-natural grasslands, rivers, streams, natural springs, wetlands, stonewalls, geological and geo-morphological systems, other landscape features and associated wildlife areas where these form part of the ecological network and/or may be considered as ecological corridors in the context of Article 10 of the Habitats Directive.	The Biodiversity Management and Enhancement Plan (BMEP) sets out the measures to be implemented to ensure that the Proposed Project will provide enhancement and offsetting opportunities within the Application Site; specifically with regard to breeding marsh fritillary habitat, native woodland creation as well as a net gain in hedgerow habitats
	NHB 6 Implementation of Plans and Strategies Support the implementation of any relevant recommendations contained in the National Heritage Plan 2030, the National Biodiversity Plan, the All-Ireland Pollinator Plan and the National Peatlands Strategy and any such plans and strategies during the lifetime of this plan.	The BMEP has been prepared with regard for national biodiversity strategies and supports the objectives of the All-Ireland Pollinator Plan and National Biodiversity Plan.
	NHB 7 Mitigation Measures Require mitigating measures in certain cases where it is evident that biodiversity is likely to be affected. These measures may, in association with other specified requirements, include establishment of wildlife areas/corridors/parks, hedgerow, tree planting, wildflower meadows/marshes and other areas. Regarding residential development, in certain cases, these measures may be carried out in conjunction with the provision of open space and/or play areas.	As described in Chapter 6 of the EIAR, a range of mitigation measures have been prescribed to prevent impacts to biodiversity via the identified pathways. In addition, habitat enhancement measures for biodiversity are included as part of the Proposed Development.
	NHB 9 Protection of Bats and Bats Habitats Seek to protect bats and their roosts, their feeding areas, flight paths and commuting routes. Ensure that development proposals in areas which are potentially important for bats, including areas of woodland, linear features such as hedgerows, stonewalls, watercourses and associated riparian vegetation which may provide migratory/foraging uses shall be subject to suitable assessment for	As described in Chapter 6 of the EIAR, detailed bat surveys have been carried out at the Application Site in line with the most up to date bat survey guidance. The potential for impacts on bats as a result of the Proposed Development has been assessed in Chapter 6 and Appendix 6-2 of the EIAR and a range of mitigation measures are in place to protect bats and their habitats.

	potential impacts on bats. This will include an assessment of the cumulative loss of habitat or the impact on bat populations and activity in the area and may include a specific bat survey. Assessments shall be carried out by a suitably qualified professional and where development is likely to result in significant adverse effects on bat populations or activity in the area, development will be prohibited or require mitigation and/or compensatory measures, as appropriate. The impact of lighting on bats and their roosts and the lighting, up of objects of cultural heritage must be adequately assessed in relation to new developments and the upgrading of existing lighting systems.	
	GBI 1 New Developments Require all proposals for large scale development to contribute to the protection, management and enhancement of the existing green/blue infrastructure of the County and the delivery of new green/blue infrastructure, where appropriate by including a green/ blue infrastructure plan as an integral part of any planning application. This plan should identify environmental and ecological assets, constraints and opportunities and shall include proposals which protect, manage, and enhance the development of green infrastructure resources in a sustainable manner.	The BMEP sets out the measures to be implemented to ensure that the Proposed Project will provide enhancement and offsetting opportunities within the Application Site; specifically with regard to breeding marsh fritillary habitat, native woodland creation as well as a net gain in hedgerow habitats. These measures support the development of green infrastructure in the county.
Landscape	**LCM 1 Preservation of Landscape Character** Preserve and enhance the character of the landscape where, and to the extent that, in the opinion of the Planning Authority, the proper planning and sustainable development of the area requires it, including the preservation and enhancement, where possible of views and prospects and the amenities of places and features of natural beauty or interest.	The Application Site is located within a rural, agricultural setting in eastern Galway. The landscape value of the Application Site is deemed to be of 'Low' value and the sensitivity of this landscape to wind farm development is deemed to be 'Low'. Visual appraisals have determined that the visibility of the turbines will be very limited beyond 5km from the site. The Landscape and Visual Impact Assessment, found in Chapter 13 of the EIAR, concludes that the Proposed Development is deemed to be acceptable from a landscape and visual perspective. Photomontages accompany the Landscape and Visual Assessment and are included in Volume 2 of the EIAR.
	LCM 2 Landscape Sensitivity Classification The Planning Authority shall have regard to the landscape sensitivity classification of sites in the consideration of any significant development	The Application Site is located in LCU 5e – North River Clare Basin Unit, within the North Galway Complex. The proposed turbines are located within an area classified as Low sensitivity,

	proposals and, where necessary, require a Landscape/Visual Impact Assessment to accompany such proposals. This shall be balanced against the need to develop key strategic infrastructure to meet the strategic aims of the plan.	which is defined as *"Unlikely to be adversely affected by change"* in the GCDP. There are no designated scenic routes in the LVIA Study Area. The LVIA finds, as concluded in Chapter 14 of the EIAR, that the Proposed Development is deemed to be acceptable from a landscape and visual perspective.
	LCM 3 Landscape Sensitivity Ratings Consideration of landscape sensitivity ratings shall be an important factor in determining development uses in areas of the County. In areas of high landscape sensitivity, the design and the choice of location of proposed development in the landscape will also be critical considerations.	The Application Site has the lowest landscape sensitivity rating. The proposed turbines are located within an area classified as Low sensitivity, which is defined as *"Unlikely to be adversely affected by change"* in the GCDP. The LVIA finds, as concluded in chapter 14 of the EIAR, that the Proposed Development is deemed to be acceptable from a landscape and visual perspective.
	PVSR 1 – Protected Views and Scenic Routes Preserve the protected views and scenic routes as detailed in Maps 8.3 and 8.4 from development that in the view of the Planning Authority would negatively impact on said protected views and scenic routes. This shall be balanced against the need to develop key infrastructure to meet the strategic aims of the plan.	There are 2 designated protected views within 20km of the Proposed Development. One of which, Summerville Lough is orientated in the opposite direction to the Application Site. The second, Glenamaddy Turlough, is located approximately 13.6 km from the nearest proposed turbine. This protected view was scoped in for assessment, with a residual visual effect of "Imperceptible". There are no designated scenic routes within 20km of the proposed turbines.
Archaeology & Cultural Heritage	**ARC 4 Protection of Archaeological Sites** Protect archaeological sites and monuments their settings and visual amenity and archaeological objects and underwater archaeological sites that are listed in the Record of Monuments and Places, in the ownership/guardianship of the State, or that are subject of Preservation Orders or have been registered in the Register of Historic Monuments, or that are newly discovered and seek to protect important archaeological landscapes.	The Proposed Development has been designed to avoid any archaeological sites and monuments. From all national monuments identified on the site a buffer of at least 30m from the Proposed Wind Farm infrastructure will be maintained. Chapter 14 of the EIAR concludes that no significant direct or indirect impacts on Cultural Heritage and Archaeology.
	ARC 5 Development Management All planning applications for new development, redevelopment, any ground works, refurbishment, and restoration, etc. within areas of archaeological potential or within close proximity to Recorded Monuments or within the	The Proposed Development has been designed with consideration for the recorded monuments of the area. Mitigation measures are outlined in Chapter 14 of the EIAR to ensure that no impacts arise.

	historic towns of County Galway will take account of the archaeological heritage of the area and the need for archaeological mitigation.	
	ARC 12 Archaeology and Infrastructure Schemes Have regard to archaeological concerns when considering proposed service schemes (including electricity, sewerage, telecommunications, water supply) and proposed roadwork's (both realignments and new roads) located in close proximity to Recorded Monuments and Places and their known archaeological monuments.	The Proposed Development has been designed with consideration for the Recorded Monuments and Places. There is one recorded archaeological site within the Application Site, comprising an 18th/19th century house (AH91), located 160m to the east of Turbine 8. Mitigation measures are outlined in Chapter 14 of the EIAR.
Flooding	**FL 2 Flood Risk Management and Assessment** Comply with the requirements of the DoEHLG/OPW The Planning System and Flood Risk Management Guidelines for Planning Authorities and its accompanying Technical Appendices Document 2009 (including any updated/superseding documents). This will include the following: (a) Avoid, reduce and/or mitigate, as appropriate in accordance with the Guidelines; (b) Development proposals in areas where there is an identified or potential risk of flooding or that could give rise to a risk of flooding elsewhere will be required to carry out a Site Specific Flood Risk Assessment, and justification test where appropriate, in accordance with the provisions of The Planning System and Flood Risk Management Guidelines 2009 (or any superseding document); Any flood risk assessment should include an assessment of the potential impacts of climate change, such as an increase in the extent or probability of flooding, and any associated measures necessary to address these impacts; (c) Development that would be subject to an inappropriate risk of flooding or that would cause or exacerbate such a risk at other locations shall not normally be permitted; (d) Galway County Council shall work with other bodies and organisations, as appropriate, to help protect critical infrastructure, including water and wastewater, within the County, from risk of flooding.	The Application Site is not susceptible to flooding. As detailed in the assessment in Chapter 9 of the EIAR, no significant effects on surface water or groundwater quality will occur.

Rural Development	**RD 1 Rural Enterprise Potential** To facilitate the development of the rural economy through supporting a sustainable and economically efficient agriculture and food industry, 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. Development of Cafes, Art Galleries, Hot Desk Facilities etc. which are important to the rural economy.	The economic benefits of wind farms include increased economic activity, employment generation, local rates and financial contributions to Local Authorities, taxes and capital investment. The Proposed Development will contribute to rural enterprise with approximately 100 jobs in the rural economy estimated to be created in total. The Proposed Development will also operate a community benefit fund.
Hydrology	**WS 6 Water Framework Directive** Support the preparation of Drinking Water Safety Plans and Source Protection Plans to protect sources of public water supply, in accordance with the requirements of the Water Framework Directive	A Water Framework Directive Assessment is included in Appendix 9-4 of the EIAR.
	WS 7 Water Quality Require that new development proposals would ensure that there would not be an unacceptable impact on water quality and quantity including surface water, ground water, designated source protection areas, river corridors and associated wetlands.	As detailed in the assessment in Chapter 9 of the EIAR, no significant effects on surface water or groundwater quality will occur as a result of the Proposed Development.
	WR 1 Water Resources Protect the water resources in the plan area, including rivers, streams, lakes, wetlands, springs, turloughs, surface water and groundwater quality, as well as surface waters, aquatic and wetland habitats and freshwater and water dependant species in accordance with the requirements and guidance in the EU Water Framework Directive 2000 (2000/60/EC), the European Union (Water Policy) Regulations 2003 (as amended), the River Basin District Management Plan 2018 – 2021 and other relevant EU Directives, including associated national legislation and policy guidance (including any superseding versions of same) and also have regard to the Freshwater Pearl Mussel Sub-Basin Management Plans.	Chapter 9, Appendix 9-4 of the EIAR includes a Water Framework Directive assessment which determines if any specific components or activities associated with the Proposed Development that will compromise WFD objectives or cause a deterioration in the status of any surface water or groundwater body and/or jeopardise the attainment of good surface water or groundwater status.
	WM 2 Requirements for Waste Management Support and promote the circular economy principles, prioritising prevention,	A preliminary Waste Management Plan is included in the CEMP. The minimisation of construction waste and the reuse of certain types

	reuse, recycling and recovery, and to sustainably manage residual waste. New developments will be expected to take account of the provisions of the Waste Management Plan for the Region and observe those elements of it that relate to waste prevention and minimisation, waste recycling facilities, and the capacity for source segregation.	of construction wastes will cut down on the cost and requirement of raw materials therefore further minimising waste levels.
Waste Management	**WM 5 Construction and Environmental Management Plans** Construction Environment Management Plans shall be prepared in advance of the construction of relevant projects and implemented throughout. Such plans shall incorporate relevant mitigation measures which have been integrated into the Plan and any lower tier Environmental Impact Statement or Appropriate Assessment. CEMPs typically provide details of intended construction practice for the proposed development, including: (a) location of the sites and materials compound(s) including area(s) identified for the storage of construction refuse; (b) location of areas for construction site offices and staff facilities; (c) details of site security fencing and hoardings; (d) details of on-site car parking facilities for site workers during the course of construction; (e) details of the timing and routing of construction traffic to and from the construction site and associated directional signage; (f) measures to obviate queuing of construction traffic on the adjoining road network; (g) measures to prevent the spillage or deposit of clay, rubble or other debris; (h) alternative arrangements to be put in place for pedestrians and vehicles in the case of the closure of any public right of way during the course of site development works; (i) details of appropriate mitigation measures for noise, dust and vibration, and monitoring of such levels; (j) containment of all construction-related fuel and oil within specially constructed bunds to ensure that fuel spillages are fully contained (such bunds shall be roofed to exclude rainwater); (k) disposal of construction/demolition waste and details of how it is proposed to manage excavated soil, including compliance with 2006 Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects, Department of the Environment, Heritage and Local Government; (l) a water and sediment management plan, providing for means to ensure that surface water runoff is	A CEMP has been prepared and is included in this planning application at Appendix 4-5 of the EIAR. The CEMP includes measures to protect the environment during the construction of the Proposed Project. The CEMP will be implemented during the construction process and will be audited by an Environmental Clerk of Works.

	controlled such that no silt or other pollutants enter local water courses or drains;	
Noise	**NP3 Noise Impact Assessments** To require an assessment of impact of the development on noise levels, having regard to the provisions of the Environmental Protection Agency Acts 1992 and 2003 and the EPA Noise Regulations 1994 when assessing planning application.	Based on the assessment detailed in Chapter 11 of the EIAR, it is concluded that no significant noise and vibration effects are anticipated for the construction, operational and decommissioning phases.
	NP 4 Noise Pollution and Regulation Restrict development proposals causing noise pollution in excess of best practice standards and regulate and control activities likely to give rise to excessive noise, other than those activities which are regulated by the EPA.	The Proposed Development will operate in accordance with the appropriate noise levels set out in the Guidelines. Stricter guidance can be adhered to by turbine controls.
	NP 5 Noise Mitigation Measures Require activities likely to give rise to excessive noise to install noise mitigation measures and monitors. The provision of a noise audit may be required where appropriate.	Operational noise monitoring will take place to ensure compliance with any noise conditions. Should noise limit exceedances be confirmed, it is proposed to mitigate for this through curtailment of turbine(s) in the relevant wind speed and directions.
Soil & Geology	**SQ 1 Soil Impact Assessments** Ensure good soil quality throughout the county by requiring developments of a certain nature (as specified in the relevant environmental legislation) to carry out assessments of the impact of the development on soil quality.	As detailed in the assessment in Chapter 8 of the EIAR, no significant effects on land, land use, peat, subsoil, soils and ground stability will occur.
	SQ 2 Soil Protection Measures To ensure that adequate soil protection measures are undertaken where appropriate.	Mitigation measures to ensure soil protection are included in Chapter 8 of the EIAR.
	G 1 Geological and Geo-Morphological Systems Protect and conserve geological and geo-morphological systems, county geological heritage sites and features from inappropriate development that would detract from their heritage value and interpretation and ensure that any plan or project affecting karst formations, eskers or other important geological and geo-morphological systems are adequately assessed with regard to their potential geophysical, hydrological or ecological impacts on the environment.	Surveys carried out on the Application Site comprised of an initial geophysical survey and subsequent site investigations, which included trial pitting and drilling. A Geotechnical Karst Risk Assessment report is included as Appendix 8-2 of the EIAR. As concluded in Chapter 8 of the EIAR, no significant effects on the land, soils and geology of the Site will occur during construction, operation, or decommissioning phases.

7.2.2 Development Management Standards

Chapter 15 of the GCDP sets out the development management standards that apply to a wide range of developments and which are required to be considered as part of the planning application process. Section 15.13.3 relates to 'Renewable Energy Proposals' with development management standard 69 directly applicable to the Proposed Development, which states as follows:

When assessing a wind energy planning application, the Council will consider the proposal regarding:

- *The Wind Energy Development Guidelines for Planning Authorities, DoEHLG, (2006) and any amendments to the Guidelines which may be made;*
- *The Local Authority Renewable Energy Strategy.*

In addition to the above, Development Management Standard 69 outlines the local considerations considered by the Council in relation to a wind energy planning application and these are reproduced below for clarity. The list of development management standards is not exhaustive, and other factors may be considered by the Councill on a case-by-case basis. The Proposed Development is assessed against each of the development management standards in Table 5 below.

Table 5: Wind Energy Development Management Standards

Local considerations taken into account by the Council	Compliance
Impact on the visual amenities	The proposed turbines are sited over 720m (4 x tip height) from sensitive receptors in a landscape without any nationally and locally protected scenic qualities. A substantial magnitude of change to the Application Site and the immediate surroundings is acknowledged, however the LVIA concludes that the impact is deemed to be acceptable from a landscape and visual perspective. There will be no impact on protected views or scenic routes.
Impact on the residential amenities of the area	The Proposed Development has been designed to avoid or mitigate against potential impacts on residential amenity. A 4 x tip height set back, set out in the Draft Guidelines for visual amenity purposes is achieved from all sensitive receptors. The criteria set out in the Guidelines in relation to Noise and Shadow flicker are achieved and will also be adhered to. The Proposed Development will also be capable of achieving the criteria set out in the Draft Guidelines. Traffic related impacts will be short term during the construction phase.
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	The cumulative impact of the Proposed Project and other projects in the area is considered in each chapter of the EIAR. The full list of the projects considered is included in Appendix 2-3 of the EIAR. The LVIA finds, as concluded in Chapter 14 of the EIAR, that the Proposed Development is deemed to be acceptable from a landscape and visual perspective. The photomontages, prepared by MKO and included in Volume 2 of the EIAR, illustrates the impact of the

	project on existing views with other existing, permitted and proposed wind turbines included.
Visual impact of the proposal with respect to protected views, scenic routes and sensitive landscapes (Class 2, 3 and 4)	The Application Site is located in the North Galway Complex Landscape Character Type and has the lowest landscape sensitivity rating of 1. There are 2 designated protected views within 20km of the Proposed Development. One of which, Summerville Lough is orientated in the opposite direction to the Application Site. The second, Glenamaddy Turlough, is located approximately 13.6 km from the nearest proposed turbine. This protected view was scoped in for assessment, with a residual visual effect of "Imperceptible". There are no designated scenic routes within 20km of the proposed turbines.
Impact on nature conservation, ecology, soil, hydrology, groundwater, archaeology, built heritage and public rights of way	The EIAR assesses the potential impact of the Proposed Development on ecology, soil, hydrology, groundwater, archaeology and the built environment. No public rights of way are interfered with as part of the Proposed Development.
Impact on ground conditions and geology	All excavation of soil, subsoil and bedrock required for site levelling and for the installation of wind farm infrastructure will be carried using best practice methods. Measures to prevent soil and subsoil erosion during excavation, reinstatement and permanent storage in spoil storage areas will be undertaken to prevent water quality effects. As concluded in Chapter 8 of the EIAR, no significant effects on the land, soils and geology of the Site will occur during construction, operation, or decommissioning phases.
Consideration of falling distance plus an additional flashover distance from wind turbines to overhead transmission lines	The Proposed Development is in compliance with EirGrid's Policy on Clearance to Overhead Lines.[15]
Impact of development on the road network in the area	As detailed in Chapter 15 (Material Assets – Traffic and Transport), there will be temporary negative imperceptible to slight impact on traffic volumes during the construction phase of the Proposed Wind Farm. A detailed Traffic Management Plan incorporating all the mitigation measures will be agreed with the roads authority prior to construction works commencing on site.
Impact on human health in relation to noise disturbance (including consistency with the Word Health Organisations 2018 Environmental Noise Guidelines for the	Based on the assessment detailed in Chapter 5 of the EIAR and the mitigation measures proposed, there will be no significant effects related to human health,

[15] *https://www.eirgridgroup.com/site-files/library/EirGrid/Wind-Turbine-Clearance-Policy.pdf*

European Region), shadow flicker and air quality	including shadow flicker, noise or air quality from the Proposed Development.
Proposals for the decommissioning of the project following cessation of use or expiry of the permitted duration of use.	A Decommissioning Plan is proposed as Appendix 4-6 of the EIAR. The decommissioning phase of the Proposed Development is also considered in each chapter of the EIAR.

7.2.3 Landscape Character Assessment

Galway County Council have prepared a Landscape Character Assessment that is contained in *Appendix 4* of the GCDP. This Landscape Character Assessment categorises Galway County into different Landscape Character Types (LCTs). The proposed turbines are located within the North Galway Complex Landscape LCT. The principal characteristics of this Landscape are described as follows, "*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".*

Within the LCTs, County Galway is further divided into Landscape Character Units (LCU's). the Proposed Development is location in the 5e – Northern River Clare Basin Unit, which is described as an *"Extensive, largely level plain with low enclosure. A long-settled working landscape of large regular stone-walled fields. Extensive areas of bog in east. Transition zone from bog areas to east".*

The Landscape Character Assessment also identifies protected views and scenic routes *"of great natural beauty located across the county".* There are no designated scenic routes within the 20km the Landscape and Visual Impact Assessment (LVIA) study area. However, there are two designated protected views within 20km. These are listed in Table 6 below. There are no designated scenic routes in the LVIA Study Area.

The Landscape Character Assessment designates each part of the County a sensitivity rating based on landscape sensitivity factors such as coastlines, ridgelines, and areas that lack significant visual screening. The proposed turbines are located within an area classified as Low sensitivity, which is defined as *"Unlikely to be adversely affected by change"* in the GCDP 2022-2028.

Table 6: Protected Views

Name	Description (GCDP)
Protected View No. 39: Summerville Lough **Significance:** Local	*"This view is from Summerville Lough picnic area. The focus of this view is Summerville Lough. The wooded shores that form the background are an important feature of the view" (Appendix 4, GCDP)* The protected view is directed east across Summerville Lough, facing away from the Proposed Development. The protected view is approximately 3.3 km east of the nearest proposed turbine.

	As this protected view faces away from the Proposed Development, it was scoped out of the LVIA assessment in Chapter 13 of the EIAR.
Protected View No. 42: Glenamaddy Turlough **Significance:** Local	*"This view is from the Glenamaddy Turlough carpark and viewing area. The focus of this view is Glenamaddy Turlough. The wooded shores that form the background are an important feature of the view." (Appendix 4, GCDP)* The protected view is directed south across the Glenamaddy Turlough and is located northeast of the Proposed Development. The protected view is approximately 13.6 km from the nearest proposed turbine. This protected view was scoped in for assessment, with a residual visual effect of "Imperceptible".

7.2.4 Renewable Energy Strategy

County Galway Wind Energy Strategy 2015-2021

The initial site selection process for the Proposed Development began in 2019. At the time of site selection, the County Galway Wind Energy Strategy 2015 – 2021 (WES) was in force and thus the site selection process was guided by the WES policies at that time. The Application Site was located in an area designated as 'Open to Consideration'. The 'Open to Consideration' zoning informed the selection process and early design stages of the Proposed Development.

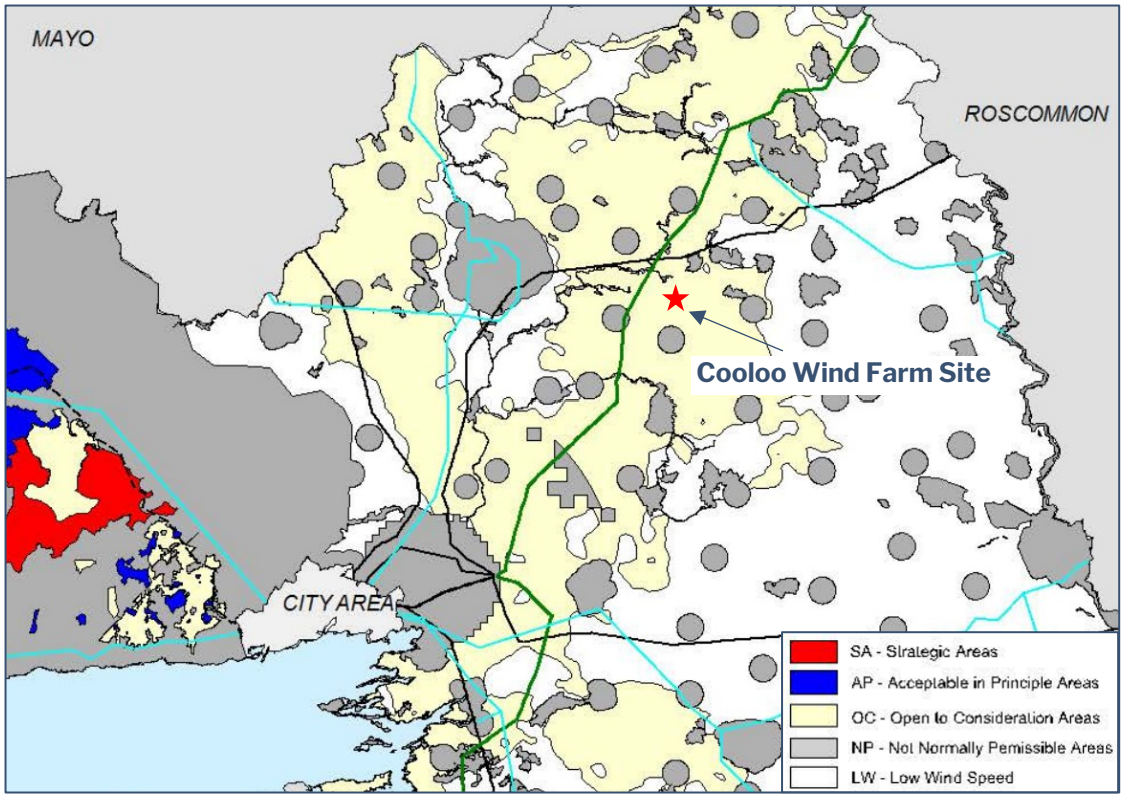

Figure 3: County Galway Wind Energy Zoning 2015 - 2021

When the current GCDP was adopted, the Application Site was partially designated as 'Generally to be Discouraged'. Whilst the modification of zoning designation status was acknowledged, the decision was made to advance with the Proposed Development through the planning process. This decision was based on detailed site surveys and a comprehensive constraints analysis concluding in the site retaining its suitability for wind energy development. The Application Site was found to have a suitable quantum of land for a wind energy development when buffers from dwellings, national monuments, telecoms links and other constraints were considered.

County Galway's Local Authority Renewable Energy Strategy 2022 - 2028

County Galway's Local Authority Renewable Energy Strategy (LARES) is included as Appendix 1 of the Galway County Development Plan 2022 – 2028. The LARES for Galway sets out guidance designed to allow County Galway to both contribute to meeting the national legally binding targets while also capitalising on those opportunities associated with the generation and harnessing of renewable energy in a sustainable manner. The vision as outlined in the LARES is as follows:

> *"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 aim of the LARES is to build upon the current policy to provide a county-wide tool for identifying areas suitable for renewable energy development. This tool is to be utilised to guide future assessments of renewable energy proposals in the county. The LARES includes policy objectives that support the development of renewable energy and wind energy in County Galway. These policies are included in Table 7 below.

Table 7: LARES Policy Objectives

Policy Objective	
LARES Policy Objective 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.'
LARES Policy Objective 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.
LARES Policy Objective 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.
LARES Policy Objective 14 National Wind Energy Guidelines	All onshore wind energy developments shall comply with the National Wind Energy Development Guidelines or any subsequent version thereof
LARES Policy Objective 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.
LARES Policy Objective 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 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.
LARES Policy Objective 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.

Of particular relevance to the Proposed Development are policy objective 3, 13, 16 and 17.

Wind Energy Zoning

The LARES includes a wind energy zoning map which classifies the area of the County into wind energy designations. The wind energy designations are as follows:

- Strategic Area
- Acceptable in Principle
- Open to Consideration

- Generally to be Discouraged
- Not normally permissible

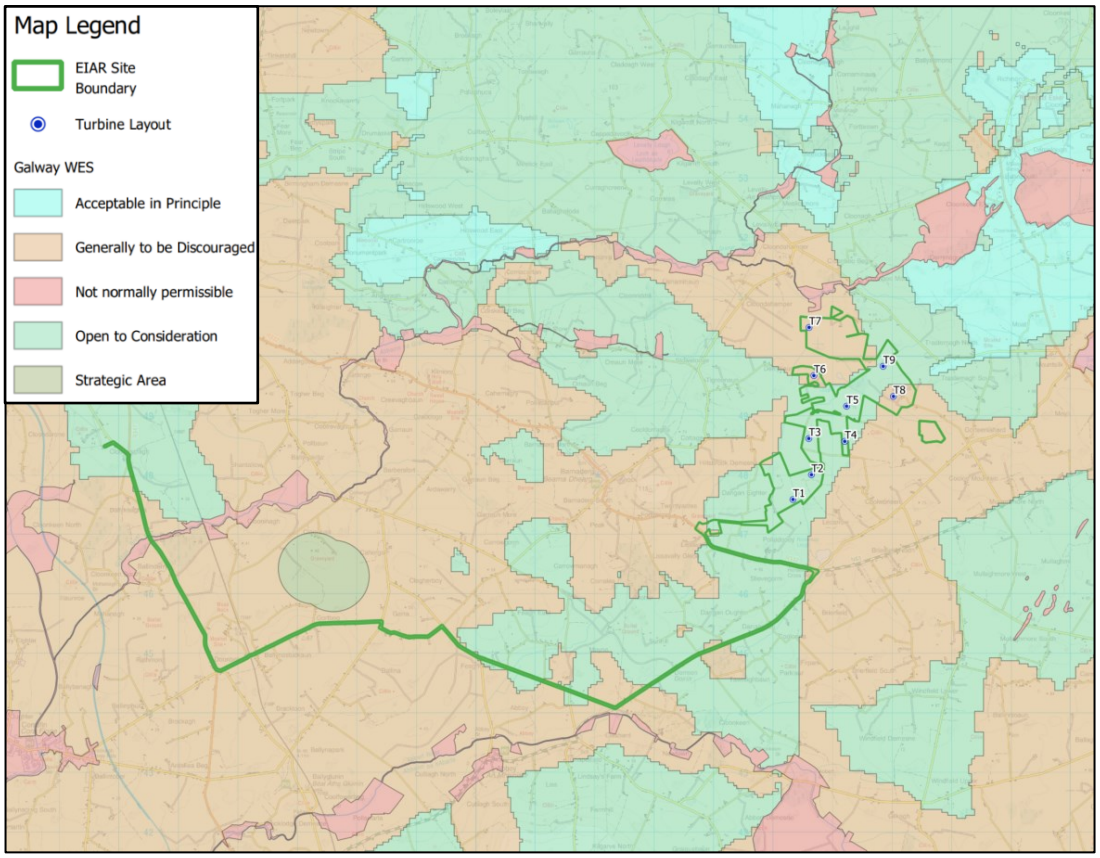

Figure 4: County Galway Wind Energy Zoning 2022 - 2028

Six of the proposed turbines are situated in an area designated as 'Open for Consideration' (OTC), where wind energy development will be assessed in line with the LARES and proper planning and sustainable development of the area. The 'meaning' of the OTC designation is '*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 remaining three of the proposed turbines are located in an area designated as 'Generally to be Discouraged' (GTBD), the 'meaning' of which is set out in the LARES and as *'Areas where Wind Energy development is unlikely to be favourably considered on account of potential to adversely affect protected landscape, water, ecological resources and residential amenity.'*

The identification of part of the Application Site as GTBD is due to the area falling into the '*lowest scoring bracket from the combination of wind opportunity and sensitivity weighting scores'.* To understand the rationale behind the wind energy zoning, an analysis was carried out, assessing the Application Site against each of the opportunity and sensitivity factors detailed in the LARES. Each opportunity and sensitivity factor are assigned a factor priority of low, medium or high. The factors and their associated priority, as outlined in the LARES, is provided below.

Factor as Opportunity or Sensitivity				
	Wind	**Solar**	**Hydro**	**Bio**
Energy Network	Opportunity	Opportunity	Opportunity	Opportunity
Road Network	Opportunity	Opportunity	Opportunity	Opportunity
Population Density	Sensitivity	Sensitivity	Sensitivity	Sensitivity
Settlements	Sensitivity	Sensitivity	Sensitivity	Sensitivity
Land Use	Opportunity	Opportunity	Neutral	Opportunity
Slope	Sensitivity	Opportunity	Opportunity	Sensitivity
Elevation	Opportunity	Opportunity	Opportunity	Neutral
Protected Areas	Sensitivity	Sensitivity	Sensitivity	Sensitivity
Flooding	Sensitivity	Sensitivity	Opportunity	Sensitivity
Landslide	Sensitivity	Sensitivity	Sensitivity	Sensitivity
Wind Speed	Opportunity	Opportunity	Neutral	Neutral
Aspect	Opportunity	Opportunity	Neutral	Neutral
Solar Radiation	Neutral	Opportunity	Neutral	Neutral
Crop potential	Neutral	Opportunity	Neutral	Opportunity

Figure 5: Extract of Table 6 of the Galway County Council LARES (Factors categorised as opportunities or sensitivities for each type of Renewable Energy)

Factor Priority				
	Wind	**Solar**	**Hydro**	**Bio**
Energy Network	High	High	High	Low
Road Network	High	Medium	Low	Low
Population Density	High	Medium	Low	Low
Settlements	High	High	High	Medium
Land Use	Medium	High	Low	High
Slope	Medium	High	Low	Low
Elevation	High	Medium	Low	Low
Protected Areas	High	High	High	High
Flooding	Medium	High	High	Low
Landslide	High	Medium	Low	Low
Wind Speed	High			
Aspect		Medium		
Solar Radiation		High		
Crop potential				High

Figure 6: Extract of Table 5 of the Galway County Council LARES (General priority of factors used to determine suitability of an area for different types of Renewable Energy)

Using the sensitivity and opportunity maps included in *'Appendix E - Informative Maps'* of the LARES, the contributing factors leading to the *'Generally to be Discouraged'* zoning on the Application Site are considered. Table 8 below provides a summary of the assessment of the factors against the Application Site. Mapping produced to inform this review is provided in Appendix 2 of this report.

Table 8: Assessment of factors against the Application Site

Opportunities	Assessment of Subject Site	Sensitivities	Assessment of Subject Site
Energy Network (High priority)	Proximity to the Cloon 110kV Substation	**Pop. Density (High priority)**	>20 and <= 50 persons per sq. km (Second lowest population category)
Road Network (High priority)	Proximity to the National Road Network (N63)	**Settlements (High priority)**	Not situated in the excluded settlement areas

Land use (Medium priority)	Pasture and Peat bogs (both identified as opportunity areas)	**Slope (Medium priority)**	Lowest rating (less than 10 degrees)
Elevation (High priority)	65.5 - 83.5 mAOD	**Protected Areas (High priority)**	Not located within the excluded landscape, geological, natura 2000 or natural heritage area sites
Wind Speed (High priority)	>7 and <=8 (m/s)	**Flooding (Medium priority)**	Does not overlap with fluvial & coastal flood areas
		Landslide (High priority)	Low (inferred)

Based on the wind energy opportunities and sensitivities outlined in the LARES, the Application Site for demonstrates a favourable prospect for wind energy development. Positioned in proximity to both the energy grid and road network, the current land use as agricultural pasture minimises the need for extensive tree felling or vegetation removal. Additionally, the site features suitable wind speeds for suitable energy generation. The Application Site exhibits few sensitivities that would impede wind energy development. Firstly, the Application Site is not located within any of the 'excluded areas' (Sensitive landscapes, designated sites, geological heritage sites, settlements). It is not prone to landslides or flooding and is not located within an ecologically protected area. Moreover, the population density within the vicinity ranges between 20 and 50 persons per square kilometre, placing it in the second lowest category on the population density map. With consideration for the wind energy opportunities and sensitivities exercise set out above, it is not clear what sensitivity factor is underlining the GTBD wind energy designation.

Taking into consideration that the presence of peat bogs within the site may be an underlying factor in the designation of the GTBD area of the Application Site to the northwest where T6 and T7 are located, in depth site investigations and geological mapping have been conducted to assess any potential impacts. The Peat Stability Risk Assessment undertaken confirmed the Proposed Development is located in areas of negligible risk. Nevertheless, the construction phase will incorporate robust peat stability management measures and industry standard construction methods to ensure that no peat failures occur on site. A Peat Management Plan has been prepared for the Proposed Project which details management of peat and spoil during construction works and long-term storage thereafter. Please refer to Chapter 8 Geology & Soils of this EIAR for details on the land, soils and geology impact assessment undertaken.

The peatland at the northwest side of the Application Site is also mapped as an Article 17 habitat (Active Raised Bog [7110]). Approximately 580m of the proposed new floating road providing connectivity between T7 and T9 travels through this mapped Article 17 habitat area. However, following detailed botanical assessments (as outlined in Appendix 6-1 of this EIAR) and described in Chapter 6 of the EIAR, approximately 285m of this proposed floating road is located within a habitat that corresponds with the Annex I habitat *'Degraded raised bogs still capable of natural regeneration (7120)*'. Floating roads over peat are proposed for areas where the peat stability assessment indicates that this construction method is suitable. Floating roads minimise impact on the peat, particularly peat hydrology, as there is no excavation required, and no subsequent peat arisings are generated. They also minimize the loss of habitat lost by reducing the alteration of flowpaths through the bog by drainage design within these habitat areas. The new floating road will lead to a direct loss of approximately 0.18ha of this habitat, which amounts to approximately 0.54% of the total raised bog habitat area within the Application Site.

Considering that residential density may be an underlying wind energy zoning factor to northeast of the Application Site where T8 is located, it should be noted that the Proposed Development has been designed to reduce potential impacts on residential amenity. The Proposed Development achieves a 4x tip height set back from all Sensitive Receptors to protect residential visual amenity, as recommended in

the Draft Guidelines. Shadow Flicker analysis demonstrates that of the 218 no. Sensitive Receptors modelled, when the regional sunshine average (i.e. the mean amount of sunshine hours throughout the year) of 24.44% is taken into account, the total annual guideline limit of 30 hours is predicted as to being potentially exceeded at 76 No. Sensitive Receptors. Mitigation measures, outlined in Chapter 5 of the EIAR, will ensure that no significant effect will arise in relation to shadow flicker and to ensure daily/ annual limits will not be exceeded. Noise analysis results conclude that no significant effects will occur on Sensitive receptors during the operational phase of the Proposed Wind Farm.

County Galway's Wind Energy Target

County Galway's LARES, set outs the existing and projected quantum of renewable energy in the County over the course of the GCDP. The overall projection for renewable energy is 1566MW. The majority of this, is predicted to come from wind energy, with an estimated total energy yield of 965MW by 2030. The remainder consists of solar energy, with an estimated yield of 216MW. These estimates derive from the existing and permitted capacity and the estimated capacity of areas favourably zoned for wind energy, as outlined in the previous section.

Upon review of County Galway's renewable energy potential, it appears that an error was made while calculating the commissioned and existing capacity of wind farms within County Galway. The total commissioned capacity of wind farms within the County as of December 2020 is stated in section 3.1 of the LARES as being 322.65 MW, with a further 124 MW of permitted un-commissioned capacity. As such, the total permitted MW capacity, as of December 2020, was 446.65. However, elsewhere in the LARES (commissioned and permitted wind farms table, pg. 30) the total capacity (operational and permitted) is stated to be 570MW. This leads to a discrepancy between the 2030 wind energy target estimations, in table 1, it is stated to be 1,373MW and in table 11 it is stated to be 1,350MW. For the purpose of this report, the estimated amount of installed wind energy is assumed to be 1,350MW.

Rather than specifying a megawatt target of renewable energy to be attained by 2030, LARES Policy Objective 3 aims to attain *'appropriate levels'* of renewable energy generation within the county. In similar fashion, the LARES Policy Objective 13 aims to *'increase renewable energy generation levels from wind energy developments'* in the county. The LARES uses terms such as 'potential yield' and 'estimated capacity' in order to describe the potential generating MW capacity of the County by 2030.

Despite the absence of explicit renewable energy targets outlined in the LARES policy objectives, it can be inferred that the deemed *'appropriate level'* of renewable energy aligns with the potential renewable energy yield specified in the LARES. With regard to the objectives of the REPowerEU, RED III, CAP 24 and other climate and energy policy, and in advance of the publication of the regional renewable electricity strategies, it is submitted that the 'appropriate level' of renewable energy in this instance is the full potential of County Galway. Furthermore, the 1.5 GW potential energy yield is considered to be a '*conservative approach'* that the Council are *'confident of achieving'*. The LARES affirms that County Galway will possess *'the capacity to realistically and sustainably deliver over 1.5 GW of renewable energy (mostly wind)'* by 2030. The ability of the County to reach these levels of renewable energy generation, based on the LARES policies, is discussed in further detail in the Wind Energy Capacity Assessment in Section 6 below. It is concluded from the Wind Energy Capacity Assessment that the Council will not be able to reach the 1.5 GW renewable energy yield when wind energy zoning and development constraints are considered. Given the urgency of meeting national climate and renewable energy targets, it is vital that all viable sites within the county are considered for wind energy development.

8. WIND ENERGY CAPACITY ASSESSMENT

A constraints analysis was carried out for the subject site at an early stage in the design process to identify a 'viable area' for wind energy development (refer to Section 5). This project level constraints analysis was then applied to the entire County in order to determine the County's potential to meet the wind energy targets stated in the GCDP and LARES.

8.1 Constraint Buffers Rationale

The rationale for selecting and applying the various constraints and setback distances as part of this wind energy capacity assessment is based on statutory guidelines, best practice industry standards and expert judgement. The rationale for each constraint buffer is summarised in Table 9 below.

It should be noted that the buffer with the largest impact, being the 4 times tip height set-back from dwellings, is a requirement of Special Planning Policy Requirement 2, as set out in the Draft Guidelines, which states as follows:

> *"With the exception of applications where reduced setback requirements have been agreed with relevant owner(s) as outlined at 6.18.2 below, planning authorities and An Coimisiún Pleanála (where relevant), shall, in undertaking their development planning and development management functions,* ***ensure that a setback distance for visual amenity purposes of 4 times the tip height of the relevant wind turbine shall apply between each wind turbine and the nearest point of the curtilage of any residential property in the vicinity of the proposed development,*** *subject to a mandatory minimum setback of 500 metres from that residential property. Some discretion applies to planning authorities when agreeing separation distances for small scale wind energy developments generating energy primarily for onsite usage.*
>
> *The planning authority or An Coimisiún Pleanála (where relevant), shall not apply a setback distance that exceeds these requirements for visual amenity purposes."* (**Emphasis added**)

The 700m setback distance applied in this instance, is based on a wind turbine tip height of 175m (175m x 4 = 700m), which is less than the 180m tip height range being applied for as part of the subject planning application. A 175m tip height was selected as it represents the average of turbine tip height of approved wind energy proposals across the country since the beginning of 2024 (see **Error! Reference source not found.** below). A rotor diameter of 150m was also selected, based on a typical rotor diameter of a wind turbine of 175m tip height.

While it is acknowledged that a smaller turbine would result in reduced setback requirement, it should be noted that wind turbine technology has been advancing rapidly in recent years with a trend towards larger, more efficient models. As a result, many smaller models that have been constructed in the past are no longer widely available and would not make the most efficient use of the wind resource of the county.

This is evident following a review of other proposed new wind farm projects that have been approved across the country since the start of 2024 (see Table 8 below). This review found a sample of 20 no. wind farm projects; the search did not include single or domestic turbines. The average wind farm turbine tip height of the wind farm projects found in the search was 178.735. This is indicative of the type of turbines that are currently on the market and widely available. Therefore, a 700m setback based on the 4 x tip height of a turbine of 175m, slightly below the average turbine tip height of **Error! Reference source not found.** below, is considered reasonable for the purposes of this assessment.

Table 9: Proposed Wind Farm Projects since 2024

Project Name	County	ACP Reference	Decision Date	No. Turbines	Tip Height (m)
Cleanrath WF	Cork	307939	16/01/2024	9	150
Sheskin	Mayo	315933	13/03/2024	21	200
Templemore	Tipperary	318704	12/09/2024	9	185
Cush	Offaly	318816	04/11/2024	8	200
Bunnyconnellan	Mayo	317560	19/11/2024	13	177-185
Ballivor Bog	Meath	316212	22/11/2024	26	200
Ballinagree	Cork	312606	19/11/2024	20	179-185
Dernacart	Laois	310312	03/01/2024	8	185
Fahybeg	Clare	317227	06/03/2024	8	169-176.5
Knockranny	Galway	318723	30/09/2024	11	150
Bilboa	Carlow	318295	21/11/2024	5	136.5
Oweninney Phase 3	Mayo	316178	25/01/2025	18	200
Glenard	Donegal	312659	25/02/2025	15	162-173
Gortyrahilly	Cork	314602	25/02/2025	14	179-185
Clonmellon	Meath & Westmeath	319448	25/03/2025	8	175-180
Kilgarvan	Kerry	319741	25/03/2025	11	200
Inchnamore	Cork	319216	02/04/2025	5	185
Coumnagappul	Waterford	318446	11/04/2025	10	185
Lackareagh	Clare	321285	11/07/2025	7	179.5 - 180
Carrig	Tipperary	318689	30/06/2025	7	179.5 -185
				Average Turbine Tip Height: 178.735m*	

** For wind farm projects proposing a range of turbine tip height, the median was selected.*

Designated sites (such as SACs, SPAs, NHAs, pNHAs) plus a 100m buffer was excluded from the capacity assessment due to the ecological sensitivity of such sites and the restrictions on development that could negatively impact such sites.

A setback of 3.5x Rotor Diameter (525m) from overhead lines was also applied, as set out in EirGrid's Policy on Wind Turbine Clearance to Overhead Lines.[16]

A setback of 192.5m from motorways, primary, regional and secondary roads, and from railway lines was applied in line with the Draft Guidelines, which states as follows:

> *"Although wind turbines erected in accordance with standard engineering practice are stable structures, best practice indicates that it is advisable to achieve a safety set back from National and Regional roads and railways of a distance equal to the height of the turbine to the tip of the blade plus 10%."*

A setback of 82.5m (blade length plus 10%) from local roads was also applied in line with best practice. A setback of 1km from airfields and 50m from watercourses/water bodies was applied in line with best practice.

Sites with existing and permitted turbines were also excluded due to these sites being unavailable for development. As of Section 5.13 of the Guidelines, turbine windtake is equal to 7 x rotor diameter in prevailing wind direction and 3 x rotor diameter in crosswind direction.

Wind energy developments must be of a certain scale to justify the required investment in grid connection infrastructure and still be commercially competitive. Therefore, very small unconstrained and potentially viable areas, particularly where they are isolated from larger viable areas, are unlikely to be able to support the development of a commercially competitive wind farm. To account for this commercial reality, a "small area filter" was applied to the viable areas mapped in this study, to identify and discount areas below a certain size from being considered further in the study.

Two criteria were used for the small area filter, as described below and illustrated in Figure 7 below.

1. Areas must be greater than 0.5km^2 in area, or
2. Areas less than 0.5km^2 must be located in close proximity to other viable areas that, when considered cumulatively, are greater than 0.5 km^2

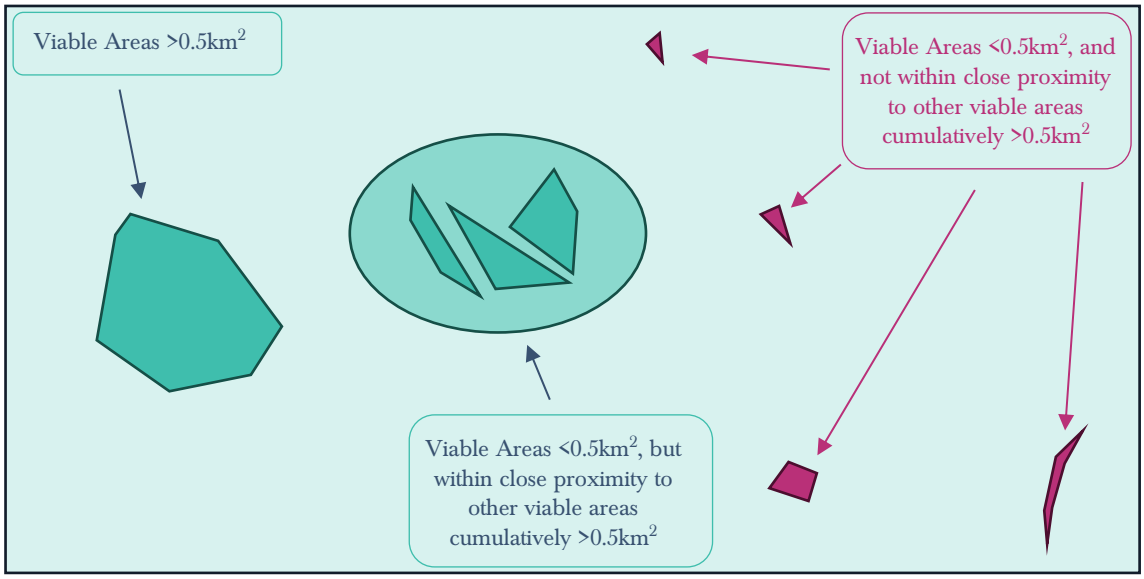

Figure 7: Illustrative example of the application of the small area filter

Table 10 below shows a summary table of the constraints applied in the wind energy assessment:

[16] *https://www.eirgridgroup.com/site-files/library/EirGrid/Wind-Turbine-Clearance-Policy.pdf*

Table 10: Constraints & Rationale

Constraint	Buffer	Constraint Rationale
Housing	700m	Approximately 4 x tip height in accordance with the setback requirements set out in the Draft Guidelines for the protection of residential amenity, based on a tip height of 175m.
Designated Sites	100m	Best practice industry standard based on ecological sensitivity
Overhead Lines	525m (3.5x Rotor Diameter for 110kV, 220kV and 440kV lines) 192.5m (Tip Height + 10% for 38kV lines)	EirGrid's Policy on Wind Turbine Clearance to Overhead Lines
Watercourses/ Waterbodies	50	Best practice industry standard
Roads	192.5m (Motorways, national & regional) 82.5m (Local)	Draft Guidelines require a turbine tip height plus 10% setback from motorways and national and regional roads
Railways	192.5m	Draft Guidelines require a turbine tip height plus 10% setback from railways
Airfields	1km	Best practice industry standard
Existing Wind Farms	The Guidelines Section 5.13 - Windtake (7 x RD in prevailing wind direction & 3 x RD in crosswind direction)	Sites no longer available
Small areas	Areas must be greater than 0.5km^2 in area, or must be areas of viable area in close proximity which cumulatively are greater than 0.5km^2	Small areas are generally not commercially viable.

Full scaled versions of the constraint mapping analysis shown below are provided in the appendix to this report.

8.2 Step 1: County Galway

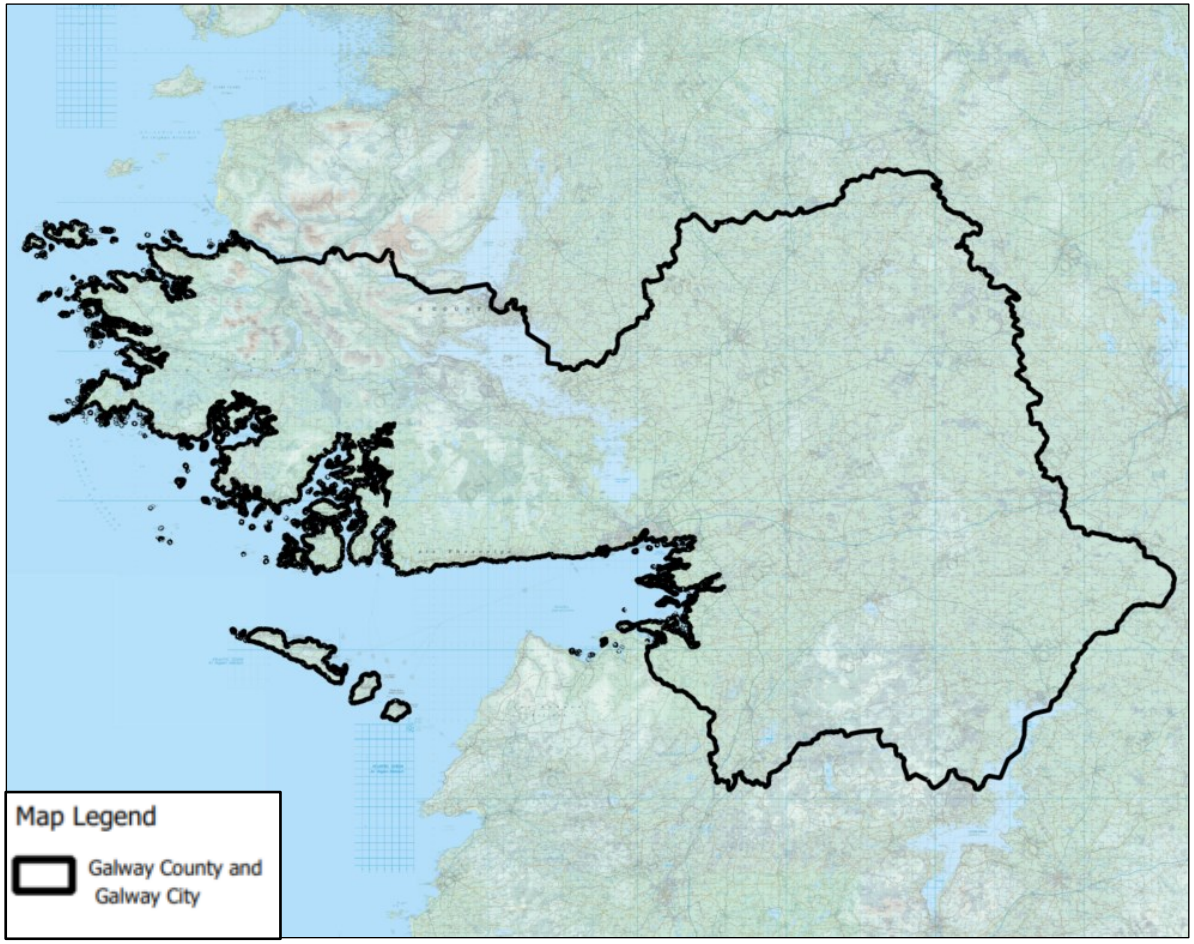

Figure 8 Galway County

County Galway (Galway City excluded)
Population: 193,323
Area: 6,095 km^2

Using the area, (6,095km^2) of the county as 100% of the area available for wind energy development, the capacity assessment eliminates in a step wise sequence areas which are subject to constraints set out in Table 9 and thus make that area not available for potential wind energy development.

8.3 Step 2: Wind Energy Policy Areas

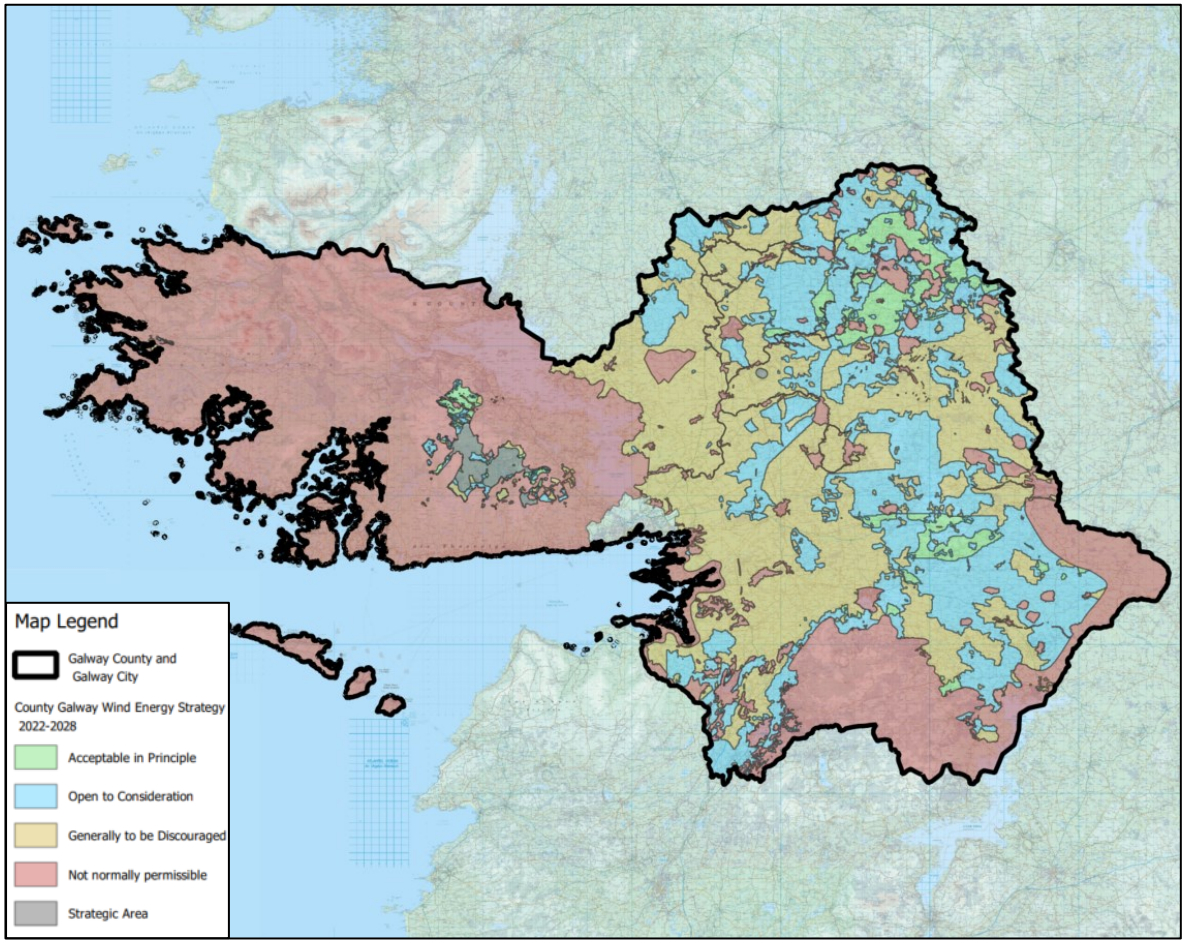

Figure 9: LARES wind energy zoning map

Zoning	Area	% of County
Strategic Areas	45.70 km^2	0.75%
Acceptable in Principle	195.99 km^2	3.22%
Open to Consideration	1,221.10 km^2	20.03%
Generally to be Discouraged	1,676.70 km^2	27.51%
Not Normally Permissible	2,953.98 km^2	48.47%

The classifications as defined in the LARES are applied to the county. Favourable policy areas, i.e. those areas that are zoned for new wind energy development (Acceptable in Principle, Open to Consideration) account for **23.26%** of the county. Unfavourable policy areas, i.e. those areas where new wind energy development is not envisaged (Strategic Areas, Generally to be Discouraged & Not Normally Permissible) account for **76.74%** of the county. Strategic Areas, as identified in the LARES, are areas with existing wind energy developments. There are no new wind energy developments envisaged for these areas. As such, Strategic areas are included in the unfavourable policy areas for the purpose of this analysis.

8.4 Step 3: Housing Constraint

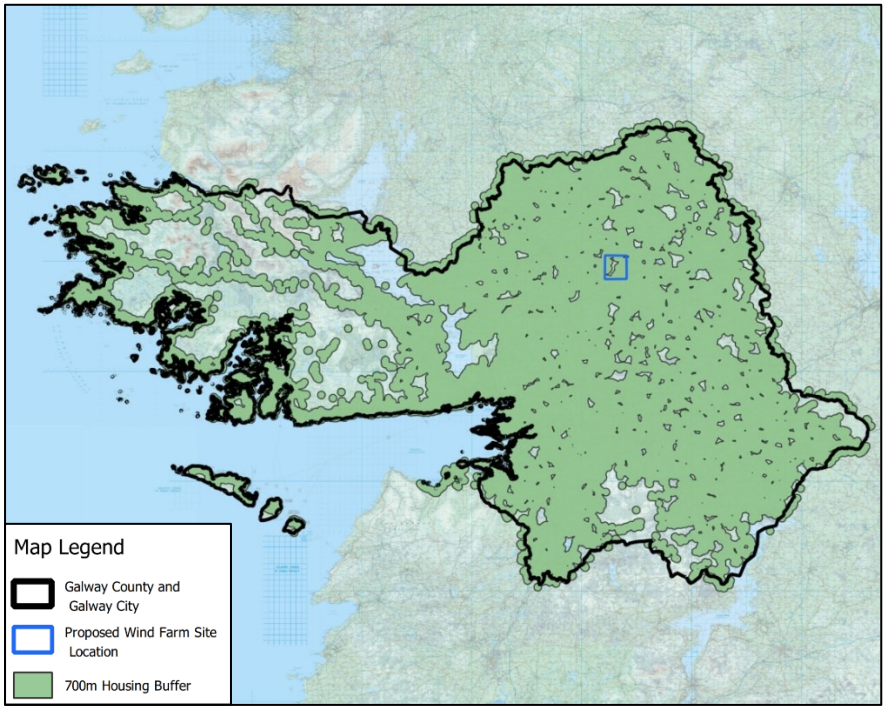

Figure 10: 700m buffer from residential dwellings

Zoning	Area remaining following housing constraint	% of County
Favourable	79.28 km^2	1.30%
Unfavourable	1,281.54 km^2	21.03%

Residential Dwellings

- 700m based on a 4 x 175m tip height.

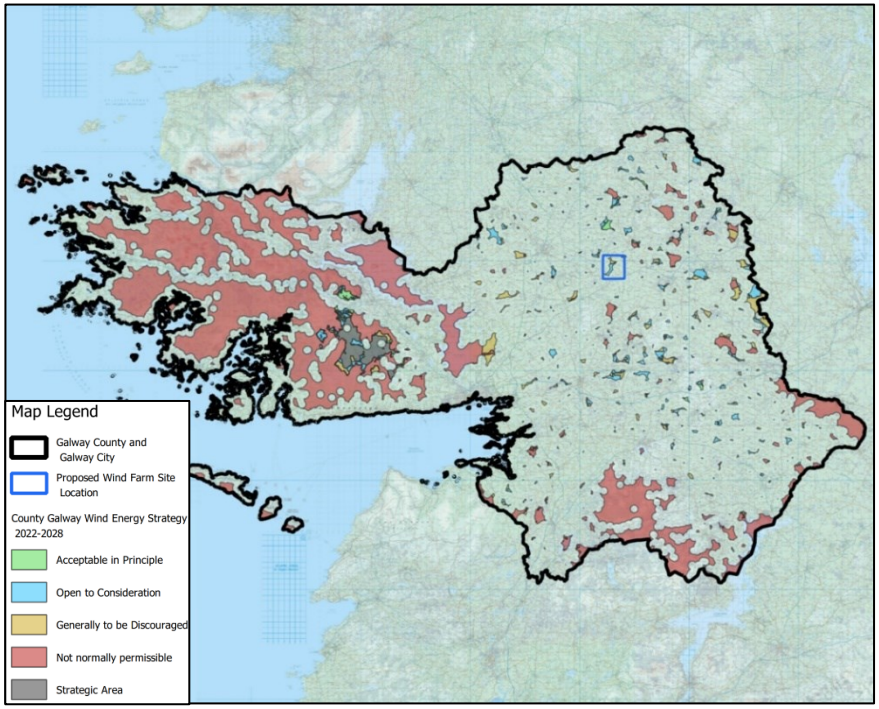

Figure 11: Remaining viable area after housing buffer is applied

8.5 Step 4: Transport Corridors and Grid Constraints

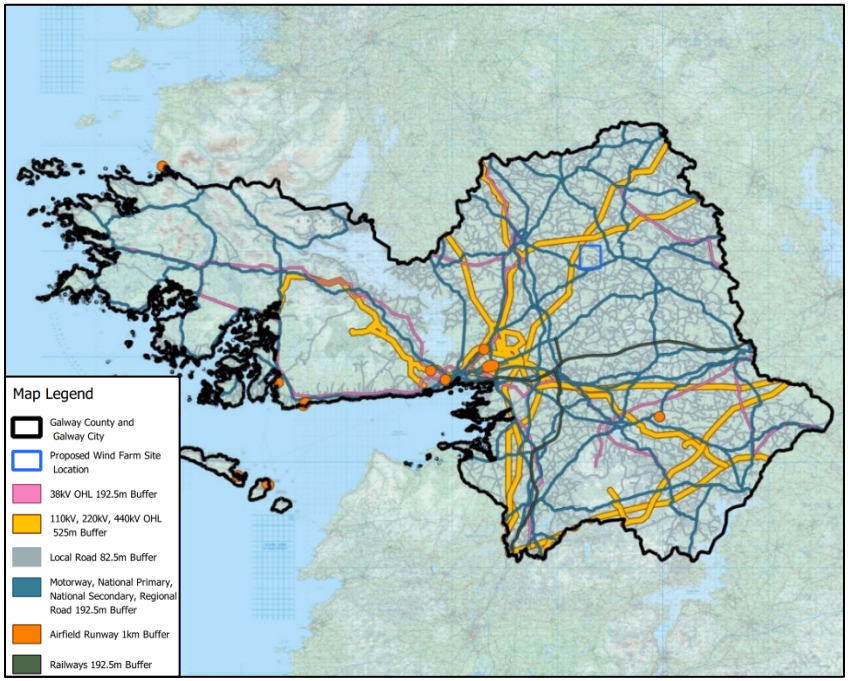

Figure 12: Buffer from transport and grid constraints

Zoning	Area remaining following Transport Corridors and Grid Constraints constraint	% of County
Favourable	67.71 km^2	1.11%
Unfavourable	1,203.25 km^2	19.74%

Transport corridors and grid constraints buffer:

- Roads – 192.5m (Motorways, National & Regional) & 82.5m (Local).
- Railroads – 192.5m
- Overhead lines – 38kV (192.5), 110kV – 400kV(525m)
- Airfields – 1km

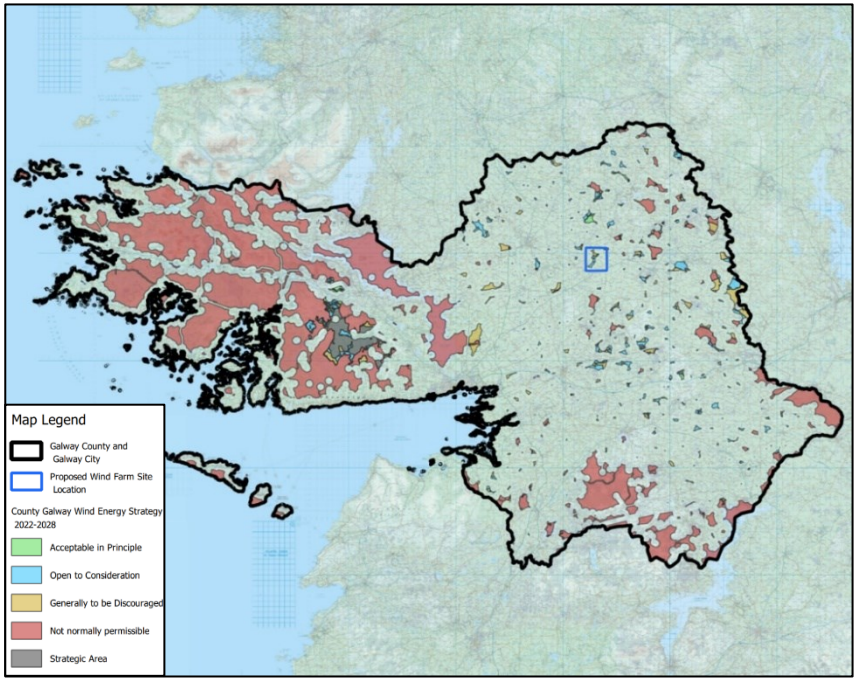

Figure 13: Remaining viable area after transport and grid corridor buffer is applied

8.6 Step 5: Watercourses and Waterbodies

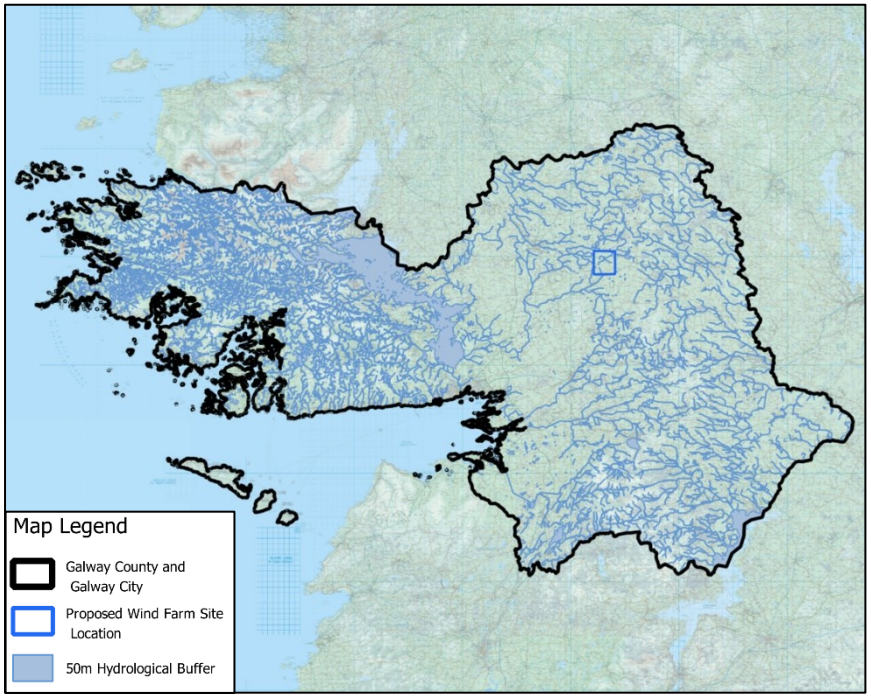

Figure 14: Buffer from watercourses and waterbodies

Zoning	Area remaining following waterbodies constraint	% of County
Favourable	59.27 km^2	0.97%
Unfavourable	858.92 km^2	14.09%

Watercourses and Waterbodies buffer

- 50m from any watercourse of waterbody as best practice industry standard.

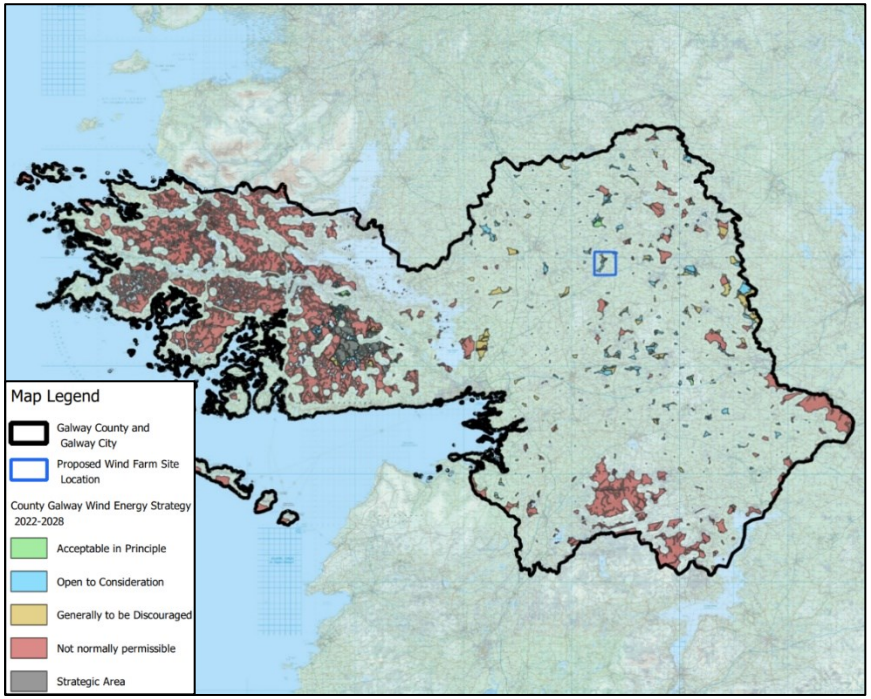

Figure 15: Remaining viable area after water constraints are applied

8.7 Step 6: Designated Sites

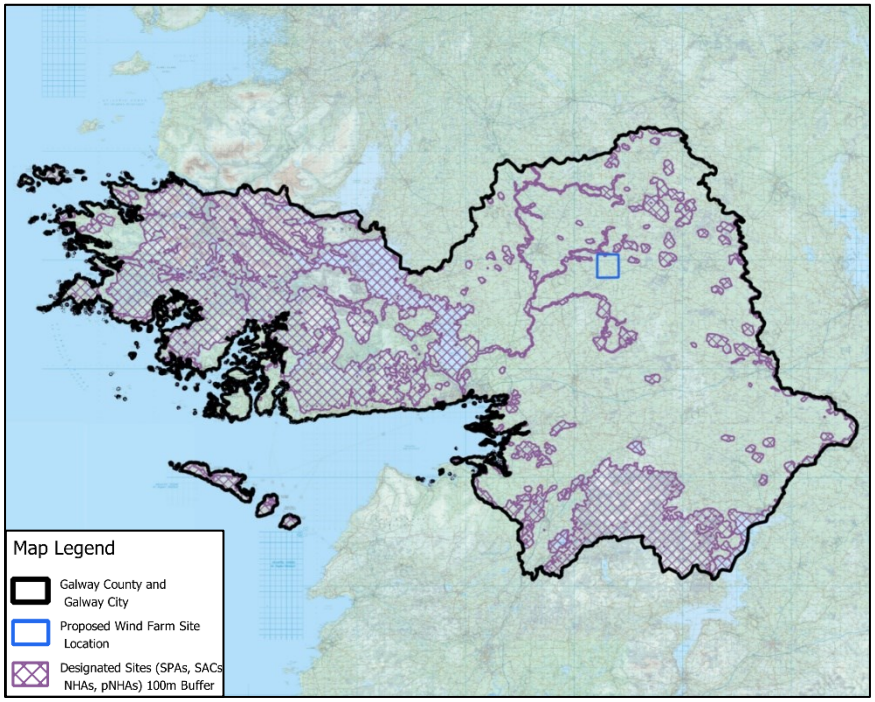

Figure 16: Buffer from designated sites

Zoning	Area remaining following designated sites constraint	% of County
Favourable	54.12 km^2	0.89%
Unfavourable	186.79 km^2	3.06%

Designated Sites

- Designated Sites (SACs, SPAs, NHAs, pNHAs) plus a 100m buffer.

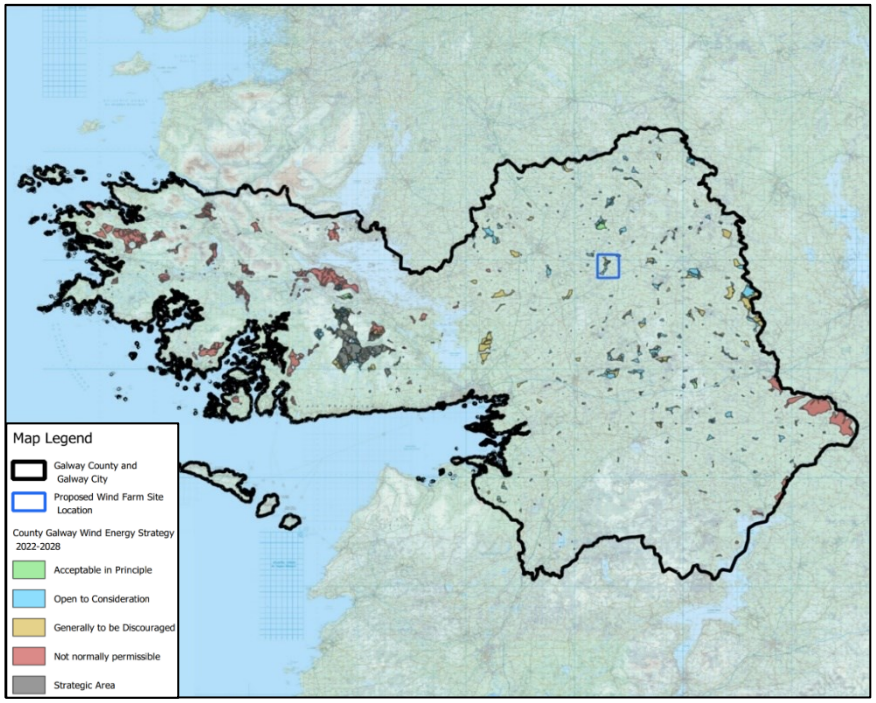

Figure 17: Remaining viable area after designated sites buffer is applied

8.8 Step 7: Existing and Permitted Wind Farms

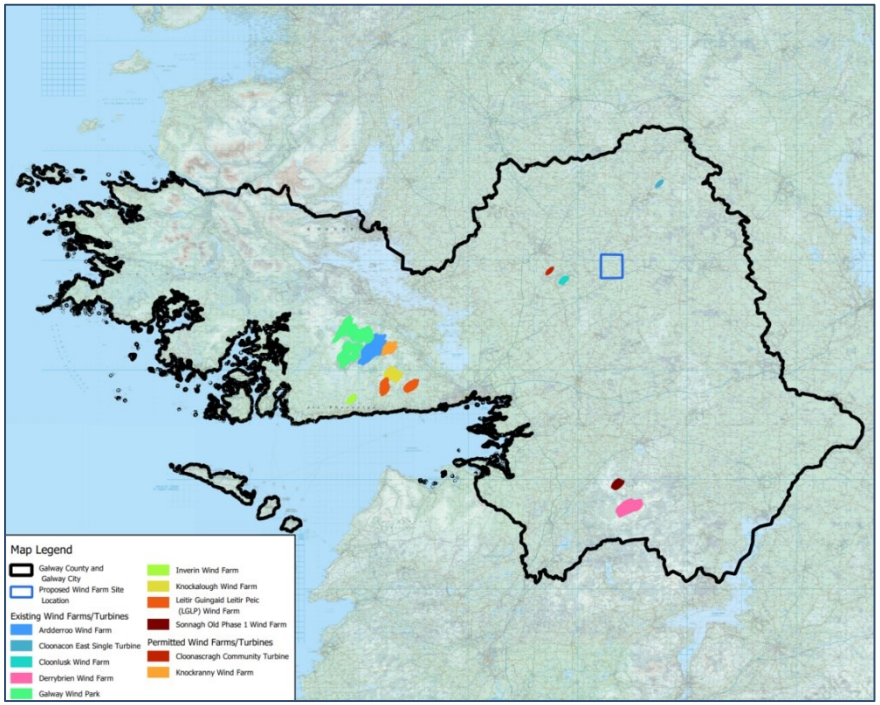

Figure 18: Existing wind turbines in County Galway

Zoning	Area remaining following existing/ permitted wind farms constraint	% of County
Favourable	52.13 km^2	0.86%
Unfavourable	159.99 km^2	2.63%

Existing Wind Farms

- The Guidelines Section 5.13 - Windtake (7 x RD in prevailing wind direction & 3 x RD in crosswind direction)

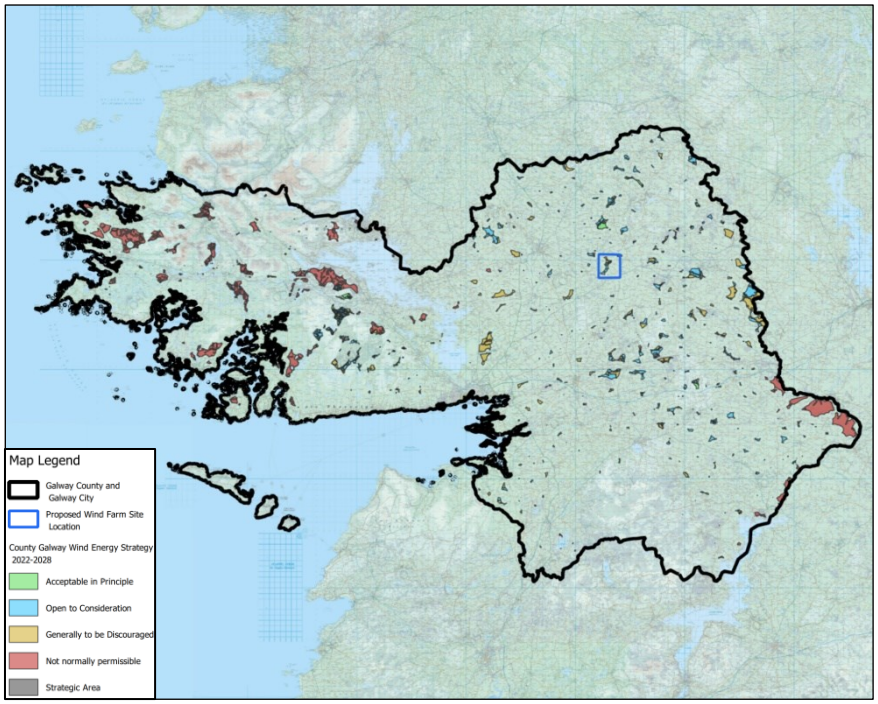

Figure 19: Remaining viable area after existing wind farms are removed

8.9 Step 8: Small Areas Filter

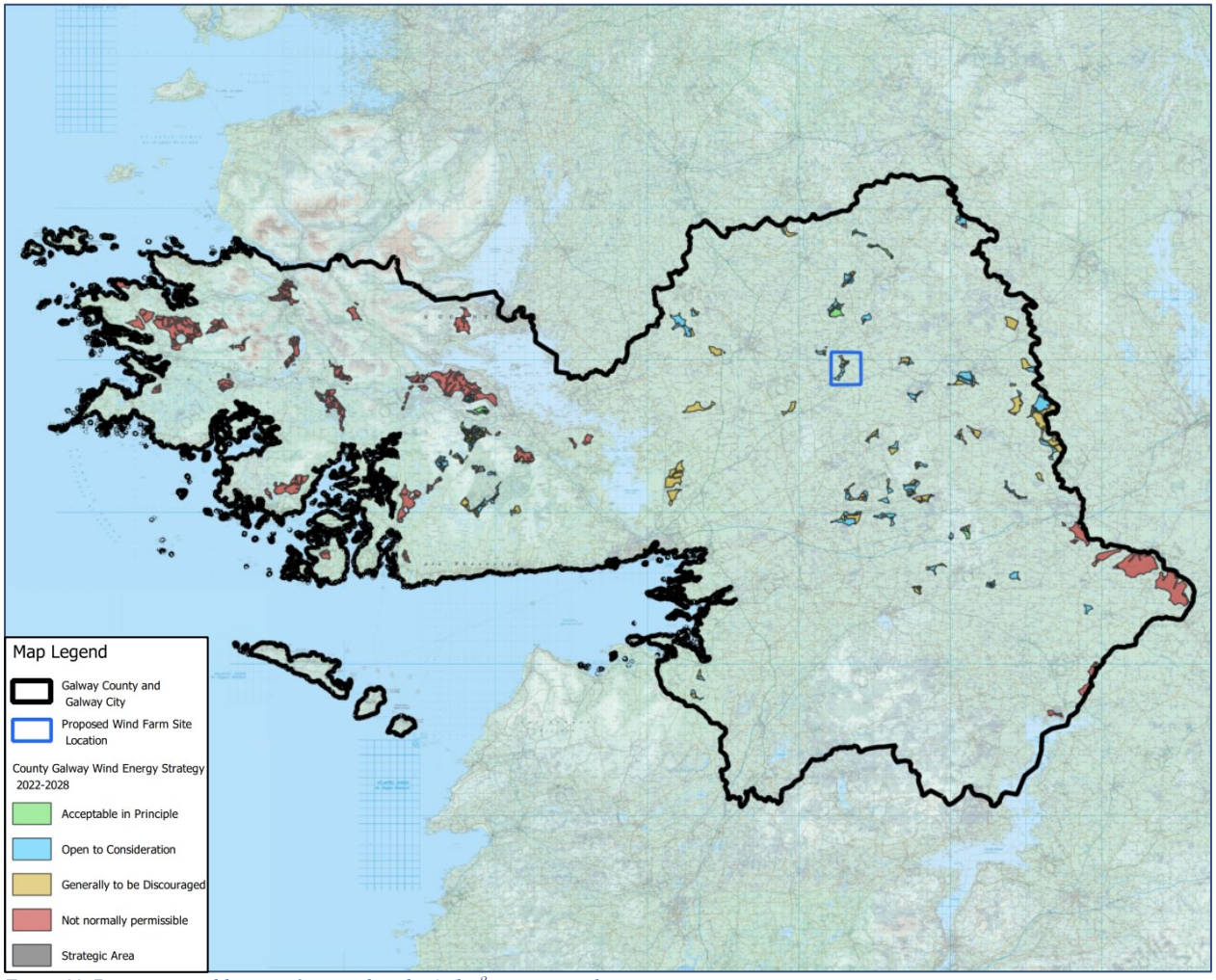

Figure 20: Remaining viable area after sites less the 0.5km^2 are removed

Zoning	Area remaining following small areas filter	% of County
Strategic Area	1.48 km^2	0.02%
Acceptable in Principle	5.62 km^2	0.09%
Open to Consideration	36.12 km^2	0.59%
Generally to be Discouraged	38.35 km^2	0.63%
Not Normally Permissable	101.23 km^2	1.66%

8.10 Actual Viable Area

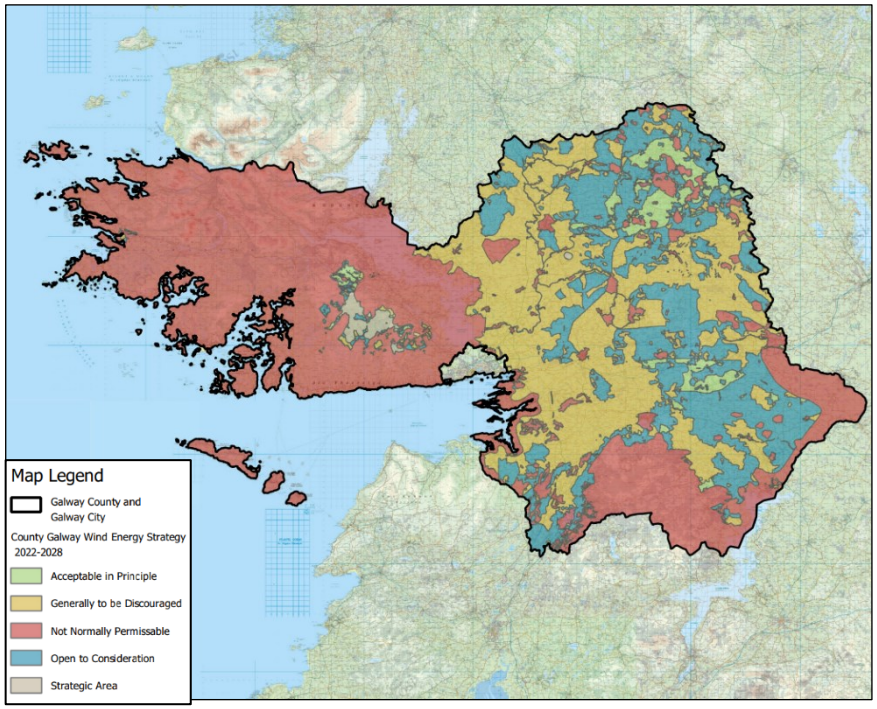

Figure 21: LARES Wind Energy Zoning Map

Zoning	Total Area	% of County
Favourable	1,417.51 km^2	23.26%
Unfavourable	4,677.37 km^2	76.74%

Vs.

Zoning	Area remaining with constraints considered	% of County
Favourable	41.73 km^2	0.68%
Unfavourable	141.05 km^2	2.31%

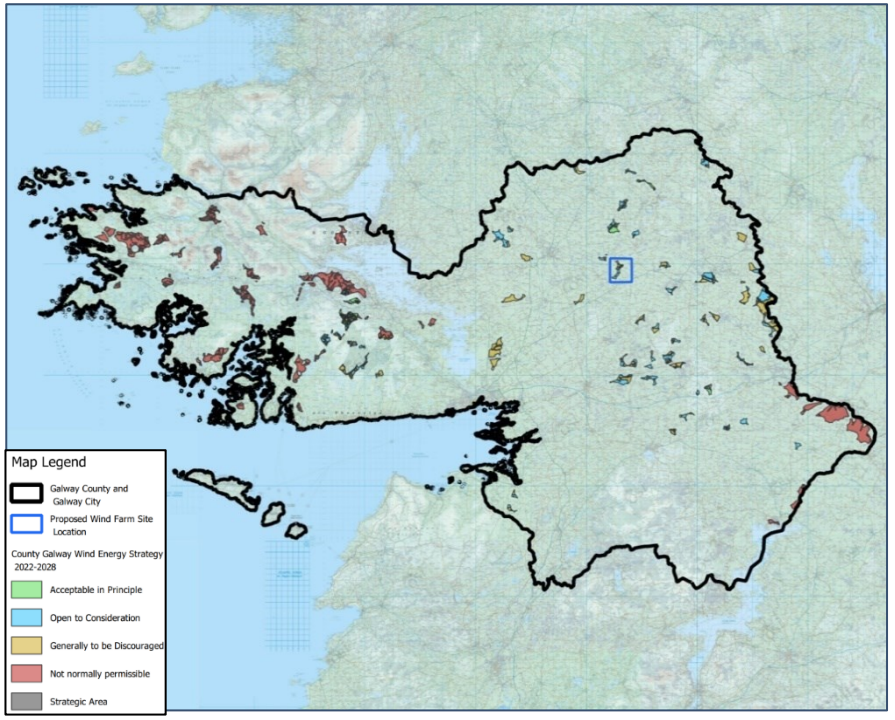

Figure 22: Actual remaining viable area

8.11 Area Remaining for New Wind Energy Development

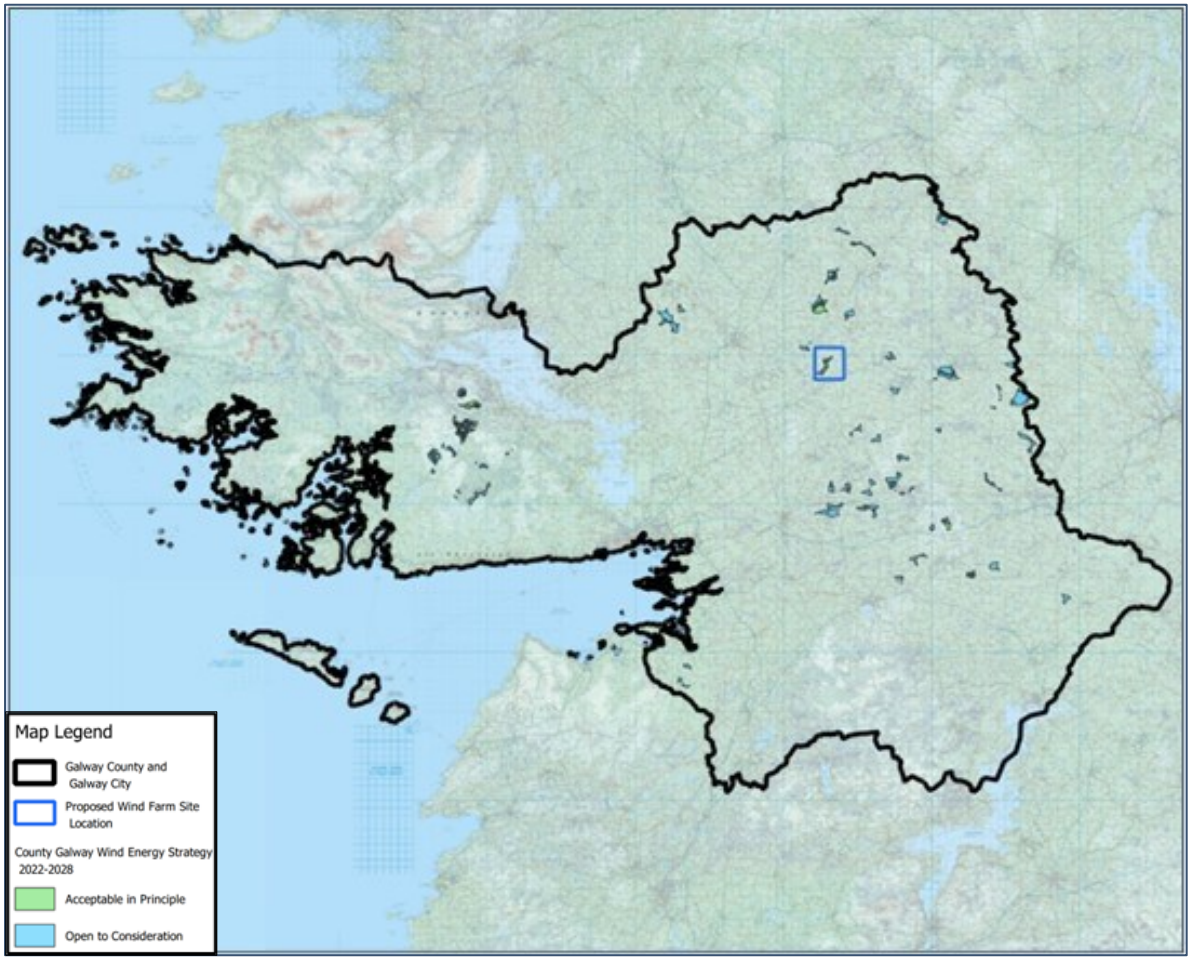

Figure 23:Remaining viable area with favourable wind energy zoning policy

Zoning	Area remaining with constraints considered	% of County
Acceptable in Principle	5.62 km^2	0.09%
Open to Consideration	36.12 km^2	0.63%
Total:	41.73 km^2	0.72%

As can be seen in the maps above, the areas zoned 'Acceptable in Principle' and 'Open to Consideration' are vastly reduced once project level constraints are applied. Once these buffers and constraints are applied, we find that only 0.72% (41.73km^2) of the county is actually available within these areas designated for new wind energy development projects.

8.12 Capacity Assessment & Wind Energy Targets

From the wind energy capacity analysis carried out above, it is found that only 0.72% (41.73 km^2) of County Galway;

- has a favourable wind energy zoning in the LARES (Acceptable in Principle or Open to Consideration), and,
- has potential for wind energy development when project level constraints are applied.

The LARES assumes that 15% of the land zoned 'Acceptable in Principle' (AIP) and 7.5% of the land zoned 'Open to Consideration' (OTC) is used for wind energy by 2030. This assumption equates to 29.62km^2 of AIP land and 92.02km^2 of OTC land. This assumption significantly overestimates the actual quantum of land viable for wind energy development in the more favourable policy areas. This assumption in the LARES is compared to the findings of the wind energy capacity in the table below.

Table 11: LARES land used for wind energy assumption compared to MKO wind energy capacity assessment findings.

Zoning	LARES assumption	MKO Wind Energy Capacity Assessment	% decrease
Acceptable in Principle	29.62 km^2	5.62 km^2	-81.03%
Open to Consideration	92.02 km^2	36.12 km^2	-60.75%

The overestimation of the quantum of viable land within these favourably zoned areas inflates the estimated potential yield from AIP and OTC areas. The LARES applies a conservative generating capacity of 7MW per km^2 of viable area. This equates to an estimation of 851MW that could be installed in County Galway by 2030.

Table 12: Capacity of the AIP and OTC areas as set out in the LARES.

Zoning	LARES assumption	7MW per km^2
Acceptable in Principle	29.62 km^2	207MW
Open to Consideration	92.02 km^2	644MW
		Total: 851MW

From MKO's vast experience in the renewable energy sector, operational wind farms typically accommodate installed generating capacities of approximately 10MW per km^2 of viable area. This is slightly higher than the 7MW per km^2 applied in the LARES. It is however acknowledged within the LARES that the 7MW per km^2 assumption is a conservative approach. The table below uses the same methodology as the LARES but considers the findings of the wind energy capacity assessment and a generating capacity of 10MW per km^2. It is acknowledged that in some circumstances a higher MW output per km^2 may be achieved, however the 10MW km^2 used for the purposes of this wind energy capacity assessment is considered reasonable.

Table 13: Capacity of AIP and OTC areas as of MKO wind energy capacity analysis.

Zoning	MKO Wind Energy Capacity Assessment	10MW per km^2
Acceptable in Principle	5.62 km^2	56.16 MW
Open to Consideration	36.12 km^2	361.17 MW

	Total: 417.33MW

This capacity assessment assumes that all viable favourably zoned sites identified in the analysis are developed for wind energy. There are several other factors which can only be identified (and therefore cannot be included in the wind energy capacity analysis above) on a site-by-site basis. This includes constraints such as land availability, grid connection capacity, site specific environmental constraints, legal issues etc. In reality, the probability of all the viable AIP and OTC sites being developed for wind energy is very low. The graphic provided in Figure 24 below is intended to illustrate the concept of project attrition, where for example, four fifths (80%) of potential sites successfully pass through each stage in the wind farm development cycle.

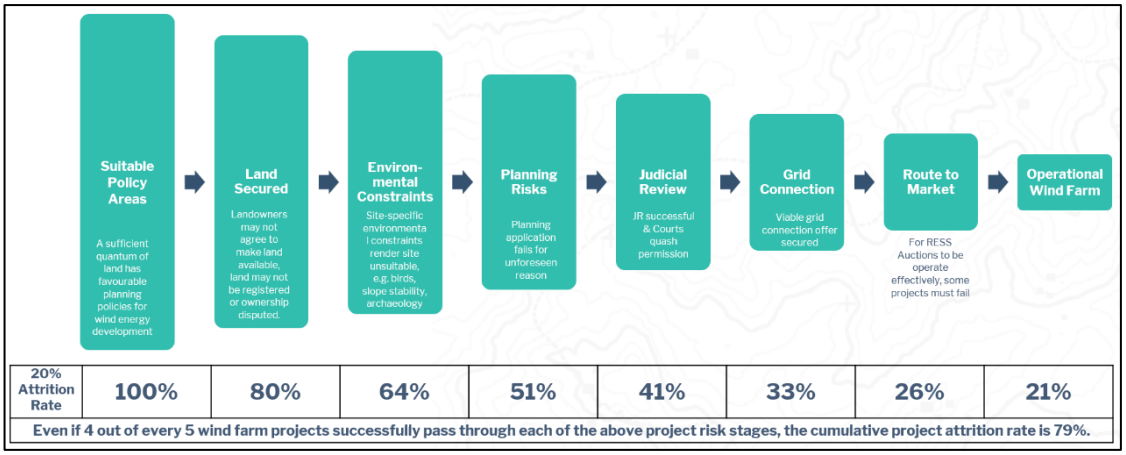

Figure 24: Wind Farm Project Attrition

It is acknowledged that new wind energy generating capacity may be installed on existing wind farm sites through repowering or extensions. The LARES estimates that 114MW will be added to the county's installed wind energy capacity through repowering. However, the LARES also acknowledges that, in a worst-case scenario, the county will lose up to 185MW of installed wind energy capacity by 2030 due to conflicts with more recent SAC designations. For the purposes of this analysis, a more optimistic approach is taken, assuming that the gain in MW resulting from the repowering of existing sites will offset any loss incurred due to the refusal of operational life extension applications due to various ecological and environmental designations and constraints. Currently, County Galway has a total built and permitted capacity of approximately 465MW. Approximately 203MW[17], is currently in the planning system awaiting decision.

By subtracting the current wind energy MW capacity (built & permitted) in County Galway from the estimated total capacity according to LARES (1,350MW) by 2030, there is a remaining 885MW of wind energy that still needs to be consented and constructed by 2030. As demonstrated in Table 12 above, the remaining viable area with favourable policy (41.73km^2) can potentially deliver approximately 417.33MW of installed capacity, far below the LARES's estimated yield of 851MW of new wind energy by 2030. If all 417.33MW were delivered by 2030, County Galway would have an installed capacity of approx. 882MW. This would leave the county approx. 468MWs short of the estimated 1,350MW total capacity by 2030.

It is clear from the analysis that in order for County Galway to reach its wind energy capacity potential and effectively contribute to the 9GW committed to under the Climate Action Plan, viable areas outside of the AIP and OTC areas must be considered. From the wind energy capacity analysis, there is c. 38.35 km^2 of viable area zoned as 'Generally to be Discouraged' (GTBD). When all viable sites zoned GTBD are considered, these areas can deliver a further c.380MW of installed capacity. With the inclusion of viable areas zoned GTBD, along with the capacities of AIP and OTC zoned areas, County Galway can

[17] *Laurclavagh Wind Farm c. 56MW, Clonberne Wind Farm c. 80MW, Shancloon Wind Farm 61.6-72.6MW (Median: 67.1MW)*

potentially increase its installed capacity by c.800MW by 2030, subject to proper planning and sustainable development. Taking into account the current, existing and permitted capacity of 465MW, the total potential capacity for County Galway by 2030 reaches 1,265MW. The inclusion of viable areas in GTBD land plus the inclusion of current wind energy developments in the planning system will ensure that Galway County will reach the envisaged total capacity of 1,350MW by 2030 as set out in the LARES. This demonstrates a clear merit and need for wind energy development in viable GTBD areas.

Table 14: Capacity of GTBD viable areas

Zoning	MKO Wind Energy Capacity Assessment	10MW per km^2
Generally to be Discouraged	38.35 km2	383.47 MW
Potential new capacity (AIP + OTC + GTBD): 800.8MW		
Current capacity (built & permitted) + Potential new capacity: 465MW + 800.8MW = 1,265.8MW		

The wind energy capacity analysis demonstrates that it is only possible for County Galway to reach its potential wind energy capacity under the current zoning set out in the LARES if viable area outside of AIP and OTC areas are considered. Given the urgency of national climate and energy targets, it is imperative that all viable sites within the county are considered for wind energy development. As such, every site brought forward for wind energy development needs to be assessed on the individual merit and suitability of the site for wind energy, regardless of its wind energy classification.

9. CONCLUSION

The provision of wind energy developments such as the Proposed Development is strongly supported by International, National and Regional policies aimed at achieving the transition to a low carbon and climate resilient economy, increasing renewable energy generation, and enhancing energy security. Specifically, the Proposed Development will contribute to achieving the State's target of generating 9GW of electricity from onshore wind and reducing GHG emissions by 80% by 2030 as set out in the CAP25. Under the Climate and Low Carbon Development (Amendment) Act 2021, public bodies, including An Coimisiún Pleanála, must carry out its functions, in so far as practical, in accordance with the latest Climate Action Plan.

It is demonstrated through the assessment of the Proposed Development against the LARES, that it remains a suitable site for wind energy development. The Application Site scores well when examined across the opportunity and sensitivity factors set out in the LARES. From a review of the sieve analysis mapping, it appears that the area in the northeast of the Application Site, where T6 and T7 are located, may have been designated 'Generally to be Discouraged' due to the presence of peat and Article 17 habitat. This has been considered in the planning application and comprehensively assessed in the EIAR. The Proposed Development is designed to limit the impact on Article 17 habitat, with turbines sited outside of this area and the utilisation of a floating road construction methodology.

It should be noted that the LARES does not specifically restrict applications for wind turbines within the Generally to be Discouraged areas, but rather, they are assessed on their merits on the principles of proper planning and sustainable development. The policy associated with the zoning in the LARES states; *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 such and having regard to the policy appraisal in section 6 of this Report, it is considered that the proposed turbines outside favourable policy areas are consistent with the policies and objectives of the LARES and the GCDP, the principal development is acceptable and therefore it should be assessed on its merits by the An Coimisiún Pleanála.

For clarity, it is considered that the Proposed Development does not materially contravene the provisions of the GCDP or the LARES, however, if the Commission were to take a different view, it is noted that the Proposed Wind Farm is strongly supported by National, Regional and Local Planning Policy and Statutory Guidelines. In this regard, it is noted that Section 37(G)(6) of Planning Act allows the Commission to: "*decide to grant a permission for development, or any part of a development, under this section even if the proposed development, or part thereof, contravenes materially the development plan relating to any area in which it is proposed to situate the development.*" Therefore, if the Commission determined that the Proposed Wind Farm materially contravenes the GCDP, the Commission has the power to grant planning permission. We respectfully submit that the Proposed Development is in accordance with proper planning and sustainable development and should be granted planning permission.

The Wind Energy Capacity Assessment undertaken as part of this report demonstrates that there is an insufficient quantum of favourably zoned land to reach the estimated wind energy yield in County Galway by 2030. The estimated MW shortfall is over 450MWs shy of the 1,350MW estimated total capacity set out in the LARES. Where it can be demonstrated that viable sites outside of the favourable policy areas are suitable for wind energy following detailed assessment, these areas should be considered for wind energy to meet national climate and energy targets.

The Climate Action Plan 2025 reaffirms Ireland's legally binding target to increase the share of renewable electricity to 50% by 2025 and 80% by 2030, with detailed individualised goals including 9 GW of onshore wind, at least 8 GW of offshore wind, and up to 8 GW of solar by 2030. To meet these ambitious targets, the Plan emphasises the need to enhance alignment between local, regional, and national planning frameworks. The revised National Planning Framework and new Regional Renewable Energy Strategies

(RRES) aim to allocate clear capacity targets across the three Regional Assemblies and ensure local authorities integrate these into their development plans.

Given the scale of renewable energy needed, all potential wind energy sites – whether favourably zoned or not - should be evaluated on their individual suitability. This ensures that every feasible project can contribute to achieving Ireland's climate and energy targets.

To combat the effects of climate change, Ireland must decarbonise its economy by 2050. There is no "silver bullet" to do so. It will take hundreds, if not thousands, of individual renewable energy projects to decarbonise the Irish economy. The scale of the challenge we face to decarbonise the Irish economy is enormous, but the climate change implications of not doing so are even greater. There is no other way to decarbonise a modern society except through renewable energy projects such as the Proposed Wind Farm.

Having regard to the key points set out in this Report, it is respectfully requested that the Commission consider the relevant planning context that applies, and grants permission for the Proposed Wind Farm which is the subject of this application.