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2. BACKGROUND TO THE PROPOSED PROJECT

2.1 Introduction

This chapter of the EIAR presents the relevant energy and climate change related policy and targets along with the strategic, regional, and local planning policies relevant to the Proposed Project. It also summarises the EIA scoping exercise, the pre-planning and community consultation undertaken, as well as the planning history and the cumulative impact assessment process undertaken in relation to the Proposed Wind Farm.

This chapter should be read in conjunction with the Planning Report which accompanies the planning application.

The Proposed Project, known as 'Cooloo Wind Farm' is being brought forward in response to local, regional, national and European policy regarding Ireland's transition to a low-carbon economy, associated climate change policy objectives and to reduce Ireland's dependence on imported fossil fuels for the production of electricity.

As detailed in Section 1.1.1 of chapter 1 of this EIAR the various project components are described and assessed using the following references: 'Proposed Project', 'Proposed Wind Farm site', 'Proposed Grid Connection', 'Proposed Wind Farm' and 'Site'. A detailed description of the Proposed Project is provided in Chapter 4 of this EIAR.

As the anticipated installed capacity of the Proposed Project is c. 54 - 64.8MW, and as this is above the Strategic Infrastructure Development (SID) threshold of 50MW, the application for the Proposed Project will be made to the An Coimisiún Pleanála under Section 37E of the Planning and Development Act 2000 (as amended) ("the Planning Act"). In addition to this, the Proposed Grid Connection falls within the 110kV SID threshold for electricity transmission infrastructure. As such, the Proposed Grid Connection will be subject to a separate, future application under Section 182A of the Planning Act.

A design flexibility opinion issued by An Coimisiún Pleanála (Case Reference ABP-316466-23) on the 19th September 2025 accompanies this planning application. The details unconfirmed in this application are the rotor diameter and the hub height of the turbines. The range of parameters under which the turbine dimensions will fall are specified on the site notices and in the design flexibility opinion that accompanies this application.

2.1.1 Statement of Authority

MKO has developed extensive expertise and experience over the last 15 years in preparing Background and Planning Policy Context Chapters for a range of projects, including multiple large scale wind energy development.

This chapter was led by Ronan Dunne of MKO with support from Hannah Rice and review from Meabhann Crowe. Ronan Dunne is a Project Planner with MKO with over 3 years of experience in private practice. Ronan holds a BSc (Hons) in City Planning and Environmental Policy, and a MSc (Hons) in Urban and Regional Planning from University College Dublin where he focused his studies on wind energy development. Since joining MKO, Ronan has been involved in a range of infrastructure projects, including onshore and offshore wind, solar, battery storage and grid infrastructure developments. In his role as a Project Planner, Ronan works with multidisciplinary teams including members from MKO's Environmental, Ecological and Ornithological departments as well as

sub-contractors from various fields in the develop/deliver reports to facilitate the planning process. Through his professional and academic experience, Ronan has gained skills in renewable energy planning, Environmental Impact Assessment, strategic and spatial planning, development management, planning appeals, condition compliance, and project management.

Hannah Rice is a project planner in the Renewable Planning team in MKO with over 4 years of experience in both private practice and with local authorities. Hannah holds a BSc in Planning, Environment and Development, as well as an MSc in City Planning and Urban Design, both of which were obtained from Queen's University Belfast. Prior to taking up her position with MKO in March 2025, Hannah worked as a Transport Planner with Jacobs, working on a variety of projects for both private and public sector clients, giving her skills in public and active transport planning, stakeholder engagement and GIS analysis. Her key strengths and areas of expertise include technical reporting, data analysis and transport planning. Since joining MKO, Hannah has been involved in a number of renewable energy projects across Ireland. Hannah holds two degrees accredited by both the Royal Town Planning Institute and the Royal Institute of Chartered Surveyors.

This chapter was reviewed by Meabhann Crowe MRTPI. Meabhann Crowe is a Project Director with MKO with over 15 years private sector experience. She is a fully chartered member of the Royal Town Planning Institute (MRTPI). Meabhann holds a BA (Hons) in Geography, Sociological and Political Science and a Master's in Urban and Regional Planning. Meabhann has particular experience in managing large multi-disciplinary teams in the preparation of planning applications across residential, mixed-use, industrial and renewable energy developments.

2.1.2

Renewable Energy Resources

Renewable energy resources are constantly replenished through the cycles of nature, unlike fossil fuels, which are finite resources that are becoming increasingly scarce and expensive to extract. Renewable energy resources offer sustainable alternatives to our dependency on fossil fuels as well as a means of reducing greenhouse gas (GHG) emissions and opportunities to reduce our reliance on imported fuels.

A gradual shift towards increasing Ireland's use of renewable energy is no longer viable. There is an urgency now to ensure real changes occur without delay. Renewable energy development is recognised as a vital component of Ireland's strategy to tackle the challenges of combating climate change and ensuring a secure supply of energy. Ireland is heavily dependent on the importation of fossil fuels to meet its energy needs. In 2024, 79.7% of Ireland's energy was imported from abroad, far higher than the European Union (EU) 2023 average of 58.3%¹. This high dependency on energy imports is highly risky, and Ireland is currently extremely vulnerable both in terms of meeting future energy needs and ensuring price stability. As such, expanding indigenous renewable energy supply is critical for energy security and price stability. The provision of the Proposed Project would aid in achieving the shift to decarbonising the electricity sector and energy security in Ireland.

2.1.3

Need for the Proposed Project

Ireland's Climate Action Plan 2025 sets ambitious yet essential targets for renewable energy, including 9GW of onshore wind capacity-with at least 5GW to be delivered by 2030 - and an 80% share of renewable electricity by the same year. However, multiple assessments, including the Climate Change Advisory Council (CCAC) Annual Review and the Environmental Protection Agency (EPA) emissions projections, confirm that Ireland is not on track to meet these targets. Significant gaps remain in renewable energy deployment, particularly in grid capacity expansion, as well as onshore and offshore wind energy development, while continued reliance on fossil fuels threatens national and EU climate commitments.

¹ Interim Energy Balance for 2024 (SEAI, May 2025)

Failure to meet binding EU targets will expose Ireland to financial penalties, increased carbon credit costs, and continued dependence on fossil fuel imports - posing serious risks to energy security and economic stability. Furthermore, Ireland's national interest, as outlined in Section 143(1) of the Act requires the rapid expansion of renewable energy, making this a matter of strategic economic and social importance.

Every viable 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.

Please see the accompanying Planning Report and Section 1.5.2 of Chapter 1 of this EIAR: Introduction for further information on the need for the Proposed Project.

2.2 Climate Change Policy and Targets

International and national policy consistently identifies the need to reduce GHG emissions and stresses the importance of reducing global warming. The context of international policy has altered over the last 30-years from being of a warning nature to the current, almost universally accepted belief, that there is a climate change emergency occurring both within Ireland and at a broader global scale. The Intergovernmental Panel on Climate Change (IPCC)'s Sixth Assessment Report² published in 2021 provides a stark assessment of global climate change and presents evidence that climate changes will increase in all regions of the globe over the coming decades and that much of the damage caused by climate change up to this point is now likely irreversible, such as the rise in sea levels over the course of the 21st century.

The Synthesis Report³ of the IPCC Sixth Assessment Report published in March 2023 summarises the state of knowledge of climate change, its widespread impacts and risks. The Synthesis Report states that *'continued global warming is projected to further intensify the global water cycle, including its variability, global monsoon precipitation, and very wet and very dry weather and climate events and seasons'*. The IPCC's projections are evident in extreme climate events occurring across the world.

According to the World Meteorological Organisation's (WMO) 'State of the Global Climate Report 2024' published in March 2025⁴, atmospheric concentration of carbon dioxide, methane and nitrous oxide in 2023 reached the highest levels in the last 800,000 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 levels⁵.

"The European State of the Climate Report 2024" produced by WMO and European Union⁶ indicated 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 carbon dioxide (+2.4 ppm) and methane (+12 ppb) have been observed since 2020.

² Climate Change 2021 'The Physical Science Basis' (Intergovernmental Panel on Climate Change, August 2021)

³ Climate Change 2023 Synthesis Report (IPCC)

https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_FullVolume.pdf

⁴ State of the Global Climate 2024 (World Meteorological Organisation, March 2025)

⁵ State of the Global Climate 2024 (World Meteorological Organisation, March 2025)

⁶ The European State of the Climate Report 2024 (World Meteorological Organization and European Union, April 2025)

- Glaciers in Scandinavia and Svalbard recorded the highest annual rates of mass loss.
- In 2024, Europe experiences the most widespread flooding since 2013.

“Ireland’s Climate 2024 Provisional Summary Report” produced by MET Eireann⁷, similarly reflects on clear and distinct impacts arising from climate change effects within an Irish context:

- 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.

The IPCC’s Sixth Assessment Report does not, however, conclude that a climate catastrophe is inevitable, but rather, there remains a ‘narrow path’ to determine the future course of climate, mainly by cutting emissions down to net zero. The Proposed Project will contribute to the decarbonisation of the energy sector and reduce harmful emissions. In this regard, it is compliant with national and international climate change policy and targets.

2.2.1

International Climate Policy

United Nations Framework Convention on Climate Change

In 1992, Ireland joined an international treaty, the United Nations Framework Convention on Climate Change (UNFCCC), as a framework for international efforts to combat the challenge posed by climate change. The UNFCCC seeks to limit average global temperature increases and the resulting climate change and cope with impacts that are already inevitable. It recognises that the climate system is a shared resource whose stability can be affected by industrial and other emissions of carbon dioxide and other GHGs. The framework set no binding limits on GHG emissions for individual countries and contains no enforcement mechanisms. Instead, the framework outlines how specific international treaties (called "Protocols" or "Agreements") may be negotiated to set binding limits on GHGs.

Kyoto Protocol

The Kyoto Protocol operationalises the UNFCCC by committing industrialised countries and economies in transition to limit and reduce GHG emissions in accordance with agreed individual targets. Ireland is a Party to the Kyoto Protocol, which came into effect in 2005, and as a result of which, emission reduction targets agreed by developed countries are now binding.

In Doha, Qatar, on 8th December 2012, the "Doha Amendment to the Kyoto Protocol" was adopted which moved to extend the Kyoto Protocol’s commitments until 2020, and includes:

- New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from 1st January 2013 to 31st December 2020;
- A revised list of GHGs to be reported on by Parties in the second commitment period; and

⁷ Ireland’s Climate 2024 Provisional Summary Report (MET Eireann, March 2025)

- Amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period.

Under the Protocol, countries must meet their targets primarily through national measures, although market-based mechanisms (such as international emissions trading) can also be utilised. An annual Conference of Parties (COP) has been established building upon the Protocol, with the Paris Agreement (COP21) shifting the focus to all countries not just developed nations.

COP21 Paris Agreement

COP21 was the 21st session of the Conference of the Parties (COP) to the UNFCCC. Every year since 1995 (excluding 2020 due to COVID-19), the COP has gathered the 196 Parties (195 countries and the EU) that have ratified the Convention in a different country, to evaluate its implementation and negotiate new commitments. COP21 was organised by the United Nations (UN) and held, in Paris, from 30th November to 12th December 2015. COP21 closed with the adoption of the first international climate agreement (concluded by 195 countries and applicable to all). The 12-page text, made up of a preamble and 29 articles, provides for a limitation of the global average temperature rise to well below 2°C above pre-industrial levels and to **limit the increase to 1.5°C**. It is flexible and takes into account the needs and capacities of each country. The IPCC's Sixth Assessment Report (2021), outlined above, further collaborates this need to limit any increase in global average temperature to 1.5°C, stating that (underlined for emphasis),

“Humanity has emitted 2,560 billion equivalent tons of CO₂ since 1750, and we only have a budget of 500 more if we want to limit warming to 1.5°C.

By following a trajectory of very low GHG emissions (SSP1-1.9), the threshold of 1.5°C will be reached in the short term, between 2021 and 2040, before being very slightly exceeded (1.6°C anticipated over the period 2041-2060) then respected in the long term (1.4°C anticipated over the period 2081-2100).

Everything is not lost, but we must pursue the Paris Agreement's most ambitious goal of limiting warming to 1.5°C.”

An article published by the IPCC on the 6th of October 2018 titled ‘Global Warming 1.5°C’, notes the impacts of global warming of 1.5°C above pre-industrial levels and related global GHG emission pathways; in the context of mitigation pathways, strengthening of the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty. This special report is part of an invitation contained in the decision of the 21st session of the COP of the UNFCCC to adopt the Paris Agreement and provides an update on the impact of climate change if emissions are not reduced.

COP25 Madrid

COP25, the 25th session of the COP, was held between the 2nd and 13th of December 2019 in Madrid. The conference was characterised by repeated warnings from civil society (National Government Organisations and corporates) on emerging evidence and scientific consensus on climate change risk. Specifically, it was noted that there are only c. *‘10 years left’ before the opportunity of limiting global warming to 1.5°C is no longer feasible*. As such, the only remaining approach to limiting rising global temperatures is a *‘7.6% reduction of global GHG emissions every year between 2020 and 2030, and to reach net zero emissions by 2050’*. However, consensus was not achieved between States on finalising the operating rules of the Paris Agreement and to ensure that it became operational by 2020. Despite the lack of consensus on the above challenges, the COP25 did achieve more limited success with regard to the introduction of the “San Jose Principles for High Ambition and Integrity of International Carbon Markets”, which sets out the framework on which a robust carbon market should

be built. These principles were supported by 23 EU nations, including Ireland, as well as countries in Latin American, 5 no. Pacific Islands and 2 no. countries in the Caribbean.

COP26 Glasgow

COP26 took place in Glasgow, Scotland between the 31st of October and 12th November 2021. The summit was centred around the fact that *“climate change is the greatest risk facing us all.”*

The key items COP26 seeks to achieve are:

- Secure global net zero by mid-century and keep 1.5 degrees within reach;
- Adapt to protect communities and natural habitats;
- Mobilise finance; and
- Work together to deliver.

All world leaders at the summit confirmed the need to urgently address the gaps in ambition and work together to achieve climate action. The summit highlighted that the Paris Agreement is working, with leaders outlining national targets and efforts to further reduce emissions. There was a clear commitment to working together to achieve climate aims, with significant announcements including:

- *“Over 40 leaders joined the Breakthrough Agenda, a 10-year plan to work together to create green jobs and growth globally, making clean technologies and solutions the most affordable, accessible and attractive option before 2030 – beginning with power, road transport, steel, hydrogen and agriculture.*
- *Over 120 countries covering more than 90% of the world’s forests endorsed the Glasgow Leaders’ Declaration on Forests & Land Use committing to work collectively to halt and reverse forest loss and land degradation by 2030, backed by the biggest ever commitment of public funds for forest conservation and a global roadmap to make 75% of forest commodity supply chains sustainable.*
- *A Just Energy Transition Partnership was announced to support South Africa’s decarbonisation efforts; a powerful example of collaboration between an emerging economy and international partners.*
- *The launch of the Global Methane Pledge saw over 100 countries committing collectively to reduce global methane emissions by 30% by 2030.”*

COP27 Sharm el-Sheikh

COP27 took place in Sharm el-Sheikh from the 6th and the 20th of November 2022. COP27 centred around three major topics:

- Closing the emissions gap to keep the 1.5°C goal alive
- Loss and Damage
- Climate Finance

COP27 officially ended on the 18th of November, but due to the nature of negotiations an outcome text and the final press conference was not held until November 20th. The first outcomes of the negotiations of the COP27 agenda were seen in the first draft document. After further discussion, a consolidated final document was produced and, while it removed much of the vague wording of the first draft, it also removed some critical key points, particularly in relation to the strengthening of actions required by developed nations. The most significant outcomes from COP27 are outlined below:

- **Phase down/out language:** The final agreement was delayed due to the stance of China and India, among others, who were not comfortable with the *‘phase out’* of coal wording in the draft text. This led to the watering down of this commitment to a *‘phase down’* of coal use. The hope was that COP27 would work to include further

language on coal and fossil fuel reduction efforts. However, the wider commitment to phase out all fossil fuels, led by India, and backed by the US and the EU, was taken out and can be marked as the biggest disappointment of COP27.

- **1.5°C Pathway:** The 1.5°C warming limit has been retained. It gives key political signals that the phase down of all fossil fuels is happening.
- **Climate Finance & Loss and Damage:** There has been the launch of an initiative by the V20 and G7 known as the Global Shield Against Climate Risk (GSACR). The intention of this initiative has been framed almost as an insurance policy backed by the World Bank to prepare and protect those most vulnerable to climate change disasters.

COP28 Dubai

COP28 took place in Dubai, United Arab Emirates was held from the 30th of November until the 13th December 2023. The Conference recognised the urgent need to reduce GHG emissions and emphasised the importance of mitigating climate change. The agreement reached at the COP provided a significant boost to renewable energy industries and set the stage for countries to prioritise clean and sustainable energy generation. By committing to this transition, the international community took a crucial step towards addressing climate change and creating a more sustainable future. Key actions arising from COP28 include:

- Adoption of enhanced climate commitments and targets by participating countries, aimed at limiting global temperature rise to 1.5 degrees Celsius above pre-industrial levels.
- Development of mechanisms and strategies for implementing these commitments, including the mobilisation of financial resources to support developing nations in their climate mitigation and adaptation efforts.
- Advancing the implementation of the Paris Agreement, with a focus on transparency, accountability, and reporting of progress.
- Accelerating the global transition to clean, renewable energy sources and phasing out fossil fuel subsidies.
- Promoting nature-based solutions and conservation efforts to mitigate climate change and preserve biodiversity.
- Addressing the impacts of climate change, such as adaptation measures for vulnerable communities and sectors.
- Collaborating on international climate finance mechanisms, carbon pricing, and technology transfer to support climate action globally.
- Strengthening international partnerships and cooperation to foster shared responsibility and collective action in addressing climate change.

The final COP28 text includes a pledge whereby signatory countries commit to work together to triple the world's installed renewable energy generation capacity to at least 11,000GW by 2030, taking into consideration different starting points and national circumstances.

COP29 Baku

COP29 took place in Baku, Azerbaijan between the 11th and 22nd of November 2024. There was a central focus on climate financing with agreements being reached on tripling finance to developing countries to help them protect their people and economies from climate-related disasters and also sharing the benefits of the boom in renewable energy. Key actions arising from COP29 include:

- Launch of the COP29 Global Energy Storage and Grids Pledge which commits signatories to a collective goal of deploying 1,500GW of energy storage globally by 2030.

- COP29 Green Energy Pledge: Green Energy Zones and Corridors which promotes the connection of green energy zones and corridors to communities in need through the development of intraregional and interregional interconnected electricity grids.
- Call to action for an equitable and renewable energy transition and increased renewable energy capacity globally.

Progress was also made on carbon markets and how they will operate under the Paris Agreement. Article 6 of the Paris Agreement allows countries to trade carbon credits, which are produced through reducing GHG emissions, to support other countries to meet their climate goals. Country-to-country trading and a carbon crediting mechanism have been made fully operational through agreements at COP29.

European Green Deal – European Climate Law (2021)

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, without reducing prosperity and while improving people's quality of life, through cleaner air and water, better health and a thriving natural world. 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. With regard to the energy sector, the European Green Deal focuses on 3 no. key principles for the clean energy transition, which will help reduce GHG emissions and enhance the quality of life for citizens:

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

The European Climate Law⁸ writes into law the objectives set out above in the European Green Deal for Europe's economy and society to become climate-neutral by 2050. Climate neutrality by 2050 means achieving net zero GHG emissions for EU countries as a whole, mainly by cutting emissions, investing in green technologies and protecting the natural environment. The European Climate Law includes:

- A legal objective for the EU to reach climate neutrality by 2050;
- An ambitious 2030 climate target of at least 55% reduction of net emissions of GHGs as compared to 1990, with clarity on the contribution of emission reductions and removals;
- A process for setting a 2040 climate target, taking into account an indicative GHG budget for 2030-2050 to be published by the Commission;
- A commitment to negative emissions after 2050;
- The establishment of European Scientific Advisory Board on Climate Change, that will provide independent scientific advice;
- Stronger provisions on adaptation to climate change; and
- Strong coherence across EU policies with the climate neutrality objective.

The law aims to ensure that all EU policies contribute to this goal and that all sectors of the economy and society play their part. All 27 no. EU Member States have committed to turning the EU into the

⁸ European Climate Law was published in the Official Journal on 9th July 2021 and came into force on 29th July 2021.

first climate neutral continent by 2050. One third of the 1.8 trillion-euro investments from the Next Generation EU Recovery Plan, and the EU's seven-year budget, will finance the European Green Deal. On 14th July 2021, the European Commission adopted a set of proposals⁹ to make the EU's climate, energy, transport and taxation policies fit for reducing net GHG emissions by at least 55% by 2030, compared to 1990 levels.

Achieving these emission reductions in the next decade, which is crucial to Europe becoming the world's first climate-neutral continent by 2050, will only be achieved through the permitting and construction of renewable energy projects, such as the Proposed Project.

2.2.1.2 Project Compliance with International Climate Policy

Based on a review of key international climate policy documents, it is clear that the Proposed Project will contribute to reducing dependence on fossil fuels for electricity generation. This shift supports the objectives of the UNFCCC to limit global temperature increases driven by climate change, as well as the goals set out in the Kyoto Protocol and various COP agreements outlined above. By making a just transition to more renewable forms of electricity generation, the level of carbon emissions will drop as our reliance on non-renewable forms of energy lessen.

The Proposed Project is also considered to be in line with the European Green Deal, and European Climate Law, which also aims to reduce carbon emissions and achieve net zero carbon emissions by 2050. These goals will not be met if projects, such as Proposed Project, are not implemented. The construction of this renewable energy development would also aid in ensuring energy security within the EU which is a target of the European Green Deal. As wind is an indigenous and abundant resource, countries can tap into their own wind potential, reducing the vulnerability to price fluctuations and geopolitical risks associated with fossil fuel imports.

2.2.2 National Climate Change Policy

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 GHG emissions by an average 7% per annum over the next decade in a push to achieve net-zero emissions by the year 2050.

With regard to renewable energy generation, the Programme notes that the Government is committed to the rapid decarbonisation of the energy sector. The Programme states the Government is *“is committed to achieving 80% of Ireland's electricity generation from renewable sources by 2030”* through the acceleration of the renewable energy deployment.

⁹ 'Fit for 55': delivering the EU's 2030 Climate Target on the way to climate neutrality (July 2021).

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

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.

The Climate Act provides the framework for Ireland to meet its international and EU climate commitments and to become a leader in addressing climate change. As indicated by the premise of the legislation, the reduction of emissions is a key proponent of the Climate Act and 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.

Under Section 15 of the Climate Act, public bodies are obliged to, in so far as practical, perform their functions in a manner consistent with the latest Climate Action Plan, the National Energy & Climate Plan 2021 – 2030, and other national climate mitigation and adaptation plans. An Coimisiún Pleanála (ACP), as a public body with consenting functions, must comply with this obligation in determining the subject application.

The Proposed Project will supply approximately 54 – 64.8MW of renewable electricity to the national grid, which represents a significant opportunity to contribute to the 51% reduction in emissions being sought, and is outlined above as a legally binding requirement. The Proposed Project is therefore considered compliant with the relevant policies and objectives set out at both the European (e.g. European Green Deal) and national tiers of governance in this regard.

Carbon Budgets

The first national carbon budget programme proposed by the CCAC, approved by Government and adopted by both Houses of the Oireachtas in April 2022 comprises three successive 5-year carbon budgets¹⁰. The total emissions allowed under each budget are shown in **Table 2-1** below.

Table 2-1: Carbon Budgets of the Climate Change Advisory Council

	2021 – 2025 Carbon Budget 1	2026 – 2030 Carbon Budget 2	2031 – 2035 Provisional Carbon Budget 3
	All Gases		

¹⁰ Climate Change Advisory Council Carbon Budget Technical Report (October 2021)
<https://www.gov.ie/en/publication/9af1bcarbon-budgets/>

Carbon Budget (Mt CO ₂ eq)	295	200	151
Annual Average Percentage Change in Emissions	-4.8%	-8.3%	-3.5%
The figures are consistent with emissions in 2018 of 68.3 Mt CO ₂ eq reducing to 33.5 Mt CO ₂ eq in 2030, thus allowing compliance with the 51% emissions reduction target by 2030.			

Section 6C of the Climate Act provides that the Minister shall prepare, within the limits of the carbon budget, the Sectoral Emissions Ceilings. These ceilings set out the maximum amount of GHG emissions that are permitted in each sector. The Government approved Sectoral Emissions Ceilings on 28 July 2022. The electricity sector is allocated a sectoral ceiling of 40 MtCO₂eq for the first budget (2021-2025) and a sectoral ceiling of 20 MtCO₂eq for the second budget period (2026-2030). In 2024, electricity sector emissions were reported to be 6.3 MtCO₂eq ¹¹.

The Environmental Protection Agency (EPA) reported in May 2024¹² that the first two carbon budgets (2021-2030) – which aim to support achievement of the 51% emissions reduction target - would not be met, and by a significant margin of between 17 and 27%. The data indicates that from 2021- 2023 Ireland has used 64% (188.4 MtCO₂eq) of the 295 MtCO₂eq Carbon Budget for the five-year period 2021-2025. Thus, indicating that only 36% of the budget was available for 2024 and 2025. To stay within budget in the first carbon budget period, emissions would need to reduce by 8% annually.¹³ Section 6D – paragraph 5 – of the Climate Act states that non-achievement of the first carbon budget would see the excess emissions carried forward into the second budget period and the second carbon budget would be reduced by that amount. If this occurs this would make achievement of the second budget substantially more difficult.

Report of the Joint Committee on Climate Action - Climate Change: A Cross-Party Consensus for Action (2019)

In March 2019, the Joint Committee on Climate Action Change released a report detailing a cross party consensus for action. In 2019 there was already concern that Ireland's performance in meeting international and national obligations was poor, and concern remained regarding emission projections the ability to meeting 2030 targets under relevant EU Directives.

The report states that the transformation of Ireland's energy system will be required for the country to meet its future 2030 and 2050 GHG emission targets; specifically, in order to reach net-zero emissions by 2050, Ireland will be required to fully decarbonise electricity generation. Therefore, there is a clear incentive for developing, and safeguarding, Ireland's capacity in renewable energies and renewable electricity. Since this report was published, the Climate Act has been enacted and there have been recent progress / future scenario assessments (e.g. EirGrid's '*All Island Generation Capacity Statement 2023-2032*' (January 2024)).

Given the clear concern that the county's future emissions targets may be missed, it is crucial that projects, such as the Proposed Project, which can contribute in a meaningful manner towards climate change targets, and which can be provided without significant adverse environmental effects arising, are brought forward and supported with favourable consideration through the planning system and constructed.

¹¹ Climate Change Advisory Council Annual Review 2025 (April, 2025)

<https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR2025-Electricity-FINAL.pdf>

¹² <https://www.epa.ie/news-releases/news-releases-2024/ireland-is-projected-to-exceed-its-national-and-eu-climate-targets.php>

¹³ EPA (2024) Ireland's Provisional Greenhouse Gas Emissions 1990-2023 <<https://www.epa.ie/publications/monitoring-assessment/climate-change/air-emissions/EPA-Provisional-GHG-Report-Jul24-v6.pdf>>

Climate Action Plan 2023

The Climate Action Plan 2023 ('CAP23') was published in December 2022 by the Department of the Environment, Climate and Communications. This outlines the actions required up to 2035 and beyond to meet Ireland's commitment to becoming carbon neutral by 2050. CAP23 sets out a roadmap to deliver on Ireland's climate ambition and is aligned to ensure that Ireland achieves its legally binding target (the Climate Act) of net-zero GHG emissions no later than 2050.

A target aims for a reduction in emissions of 51% over the period 2018 to 2030 and in doing so, prevent/mitigate the potentially devastating consequences of climate change on Ireland's environment, society, economy and natural resources. CAP23 states that to do so, Ireland must harness the untapped indigenous renewable resources and has a target of achieving 80% of energy being produced from renewable sources by 2030 (unchanged from the previous Climate Action Plan, 2022) with a target of 9GW of that being produced by onshore wind. Measures set out in CAP23 to achieve these targets include to '*accelerate and increase the deployment of renewable energy to replace fossil fuels*' (Section 12.1.4 of CAP23). It is clear from the message and ambition of CAP23 that the drive to deploy renewable energy projects such as the Proposed Project in Ireland are critical to achieving the aims and objectives of CAP23 including the 9GW of onshore wind energy by 2030 and carbon neutrality by 2050.

"Achieving these ambitions will require a coordinated effort across Ireland and every economic sector will be involved. It requires no less than a national transformation over the coming years in how we work, travel, heat our homes, source our energy and use our land".

Decarbonisation of the electricity sector is, as noted in CAP23, key to the decarbonisation of other sectors who will depend on electrification including transport, heating and industry. The increase in the portion of renewable electricity of 80% by 2023 will come in part from a targeted 9GW of onshore wind. CAP23 notes:

"Achieving further emissions reductions between now and 2030 requires a major step up in how we accelerate and increase the deployment of renewable energy to replace fossil fuels, deliver a flexible system to support renewables, and manage electricity demand".

Chapter 12 of CAP23 sets out the state of play, targets and actions for the decarbonisation of the electricity sector. Carbon emissions from electricity have fallen by 45% between 2005 and 2020, falling by 19% between 2005-2012 and by 33% between 2012 and 2020. This trend is largely due to the availability of renewable energy generated electricity (a sixfold increase between 2005 and 2020) and an associated reduction in the use of carbon heavy fuels such as peat and coal.

Due to the scale of the challenge, and the recognition of central role of the electricity sector in achieving sector wide targets, the electricity sector has been allocated the smallest carbon budget and will require the steepest carbon emissions decline of all sectors – namely a reduction in carbon emission by -75% relative to 2018 baseline. Carbon budgets 1 and 2 allow for 40.02 MtCO₂eq from the electricity sector up to 2025 and 20 MtCO₂eq from 2026-2030. This means an average of 8 MtCO₂eq per annum. Emissions for the period 2021 were 9.98 MtCO₂eq, which is in exceedance of 8 MtCO₂eq, which means that to keep on track, electricity will now have to achieve annual emissions of c. 7.5 MtCO₂eq from 2022 to 2025. The measures set out for electricity sector include *inter alia*:

- Reduce annual CO₂eq. emissions from the sector to 3 MtCO₂eq by 2031 (75% reduction compared to 2018);
- Accelerate and increase the deployment of renewable energy to replace fossil fuels;
- Accelerate the delivery of onshore wind, offshore wind and solar through a competitive framework to reach 80% of electricity demand from renewable energy by 2030;
- Target 6 GW of onshore wind and up to 5 GW of solar by 2025;
- Target 9 GW onshore wind, 8 GW Solar and at least 5 GW of offshore wind by 2030;

- Align the relevant constituent elements of the planning and permitting system to support accelerated renewable energy development, supported by national policy and associated methodologies to inform regional and local planning policies, noting that county development plans are obliged to set out objectives to facilitate energy infrastructure.

Having regard to the targets and measures set out above, it is evident that there is strong policy support for the provision of additional renewable energy generators, such as the Proposed Project.

Climate Action Plan 2024

The Climate Action Plan 2024 ('CAP24') builds on CAP23 by refining and updating the status of the actions required to deliver the decarbonisation required under the carbon budgets and sectoral emissions ceilings. The renewable electricity generation targets are unchanged from the CAP23 (9GW of onshore wind and 80% renewable electricity share).

CAP24 includes the latest trends in the electricity sector:

- In 2022, renewable generation accounted for 38.6% of electricity, an increase from 35% in 2021.
- Electricity accounted for 14.4% of Ireland's GHG emissions in 2022.
- To meet the first carbon budget the electricity sector requires a decarbonisation rate of 17.3% per annum in the period 2023-2025. For context, the decarbonisation rate between 2018 and 2022 was 1.4% per annum.

CAP24 acknowledges the urgency and importance of the decarbonising of the electricity sector. The plan states:

"Given that the programme of large-scale offshore wind deployment is expected to be realised towards end decade, deployment rates for onshore renewables will need to increase to match demand growth to ensure we keep electricity emissions within range of the carbon budgets. This requires a major upscaling and accelerating in current deployment of renewables, particularly onshore wind."

The scale of the challenge is apparent when quantified:

*"As an example, the historical average deployment of onshore wind installed capacity connected between 2008 and 2020 inclusive was 280 MW per annum from 19 projects (with an annual maximum of 612 MW). 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)

CAP24 identifies the alignment of local and national policy as critical to accelerate renewable energy rollout:

"greater alignment between local plans and renewable energy targets at national and regional level to support investment in and delivery of onshore wind and solar renewable energy is also critical."

Having regard to the targets and measures set out above, it is clear that there is strong policy support for the provision of additional renewable energy generators, such as the Proposed Project.

Climate Action Plan 2025

The Climate Action Plan 2025 (CAP25) represents the third statutory update to Ireland's climate roadmap under the Climate Action and Low Carbon Development 2015 (as amended). 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).

2.2.2.2 Project Compliance with National Climate Policy

The Proposed Project aligns with the national climate policy objectives. The Proposed Project will make a significant contribution to achieving the CAP25 target of 9GW of onshore wind energy by the year 2030. Furthermore, the Proposed Project will aid Ireland in adhering to, or limiting the exceedance of, the country's carbon budgets. Currently, the electricity sector is rapidly approaching the designated sectoral ceiling of 40 MtCO₂eq for the first carbon budget period from 2020 to 2025. The national renewable energy targets and the carbon budgets are integral to the government's response to the climate crisis.

2.3 Renewable Energy Policy and Targets

This section of the EIAR provides a breakdown of international and national renewable energy policy with regard to the Proposed Project. Under this section, the following are discussed:

- EU Renewable Energy Policy
- National Renewable Energy Policy

National policy has developed in line with European and international policies, targets and commitments, in that the importance and urgency of decarbonising the energy generation sector, the economy in general and reducing GHG emissions has become increasingly more apparent.

The Proposed Project complies with the nationally stated need to provide a greater amount of renewable energy onto the national grid and will further reduce the national reliance on fossil fuels for electricity generation.

2.3.1 European Renewable Energy Policy

Renewable Energy Directive

The Renewable Energy Directive ('RED') is the EU legal framework for the development of renewable energy across all sectors of the EU economy, supporting clean energy cooperation across EU countries. Since the introduction of the RED in 2009, it has undergone several revisions, the most recent of which occurred in November 2023. Since its adoption in 2009, the share of renewable energy sources in energy consumption has increased from 12.5% in 2010 to 24.5% in 2023¹⁴. Of the 27 EU member states the lowest proportions of renewables were recorded in Ireland (13.1%). Crucially, the RED sets the overall target for renewable energy in the EU.

¹⁴ <https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20241219-3>

RED I – 2009

Renewable Energy Directive 2009 (RED I - the original RED) (2009/28/EC), adopted in 2009, set binding targets for EU member states to achieve a 20% share of renewable energy in final energy consumption by 2020. It established a framework for national renewable energy action plans, sustainability criteria for biofuels and bioliquids, and a system of guarantees of origin for renewable energy.

RED II – 2018

RED II, the first major amendment to the RED, (2018/2001/EU) entered into force in December 2018, as part of the Clean Energy for all Europeans package. In RED II, the overall EU target for Renewable Energy Sources consumption by 2030 was raised to 32%.

RED III – 2023

In November 2023, a revision of the Renewable Energy Directive¹⁵ (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 42.5%, with an ambition to reach 45% by 2030. The increase was proposed under the publication of REPowerEU plan in May 2022. RED III also introduces specific targets for Member States in the industry, transport, and building (district heating and cooling) sectors.

Under Article 15c of RED III, EU member states must identify ‘Renewables Acceleration Areas’ of where projects will undergo a simplified and fast-track procedure. RED III defines the timeframes for the permit-granting procedure. In Renewables Acceleration Areas, the permit-granting procedure shall not exceed 12 months for renewable energy projects and outside renewables acceleration areas the permit-granting procedure shall not exceed two years.

Central to RED III is the presumption that renewable energy development must be considered to be **in the overriding public interest** when addressing competing interests under the Habitats Directive (92/43/EEC), Birds Directive (2009/147/EEC) and the Water Framework Directive (2000/60/EC). The recognition of renewable energy projects being in the ‘*overriding public interest*’ was originally introduced under Article 3(1) of emergency Regulation 2022/2577 of 22nd December 2022 named ‘*laying down a framework to accelerate the deployment of renewable energy*’ in response to REPowerEU which found that the permitting process is the biggest bottleneck for deploying wind at scale, with approximately 80 GW of wind power capacity stuck in permitting procedures across Europe.

Article 16f of RED III states:

‘By 21 February 2024, until climate neutrality is achieved, Member States shall ensure that, in the permit-granting procedure, the planning, construction and operation of renewable energy plants, the connection of such plants to the grid, the related grid itself, and storage assets are presumed as being in the overriding public interest and serving public health and safety when balancing legal interests in individual cases for the purposes of Article 6(4) and Article 16(1), point (c), of Directive 92/43/EEC, Article 4(7) of Directive 2000/60/EC and Article 9(1), point (a), of Directive 2009/147/EC.’

There is an 18-month period to transpose most of the directive's provisions into national law ending on the 1st of July 2025, with a shorter deadline of July 2024 for some of the provisions related to permitting for renewables. In September 2024, the EU Commission opened infringement proceedings against Ireland for failures in relation to the transposition of permitting procedures. On the 17th of July 2025, the EU decided to send a ‘reasoned opinion’, a formal request to comply with EU law, giving Ireland two months to respond and take the necessary measures to complete the transposition. In August 2025, some of the provisions of RED III were transposed into national law through the European Union

¹⁵ 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)

(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 based on a “completeness check” (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**.

Energy Roadmap 2050

The Energy Roadmap 2050 was published by the European Commission in 2011 and analyses the transition of the contemporary energy system in ways that would be compatible with the GHG reductions targets as set out in the RED (Directive 2009/28/EC) while also increasing competitiveness and security of supply. To achieve these targets and objectives, the Roadmap states that significant investments will need to be made in new low-carbon technologies and renewable energy, e.g. wind energy infrastructure, energy efficiency and grid infrastructure. Five main routes are identified to achieving a more sustainable, competitive and secure energy system in 2050:

- High Energy Efficiency;
- Diversified Supply Technologies;
- High Renewable Energy Sources;
- Nuclear energy; and
- Carbon capture and storage.

The analysis found that decarbonising the energy system is technically and economically feasible. The Roadmap notes that all scenarios show the biggest share of energy supply technologies in 2050 comes from renewables. In this regard, it should be noted that the CCAC stated within their 2024 Annual Review that:

“progress to reduce emissions is not sufficient for Ireland to meet its national and EU climate obligations. Reliance on fossils fuels needs to end, and urgent action is required to ensure that people, places and nature can adapt to the changing climate and prepare for rapidly emerging climate risks. The current rate of policy implementation is too slow and fragmented, and more effective engagement across all segments of policy and society is required to empower sustainable decision-making and to understand and remove barriers to action.”

As such, a major prerequisite for a more sustainable and secure energy system is a higher share of renewable energy up to and beyond 2030 to 2050. Each of the scenarios assumes in the analysis that increasing the share of renewable energy and using energy more efficiently are crucial, irrespective of the particular energy mix chosen.

The Proposed Project will aid in achieving the scenarios set out in the Energy Roadmap 2050, by increasing the share of renewable energy being produced onto the national grid thereby reducing the reliance on more unsustainable forms of electricity production.

European Green Deal

The European Green Deal, further detailed in Section 2.2.1 above, was launched in December 2019 and proposes to increase the binding target of renewable sources in the EU’s energy mix from 32% to 40% by 2030 via amendments to the RED as per the ‘Fit for 55’ package (July 2021)¹⁶. The European

¹⁶ <https://www.consilium.europa.eu/en/policies/eu-plan-for-a-green-transition/>

Green Deal recognises that 75% of the EU's GHG emissions stems from the production and use of energy, hence emphasising the need to decarbonise the EU's energy system. The deal identifies three key principles to support a clean energy transition:

1. *Ensuring a secure and affordable EU energy supply.*
2. *Developing a fully integrated, interconnected, and digitalised EU energy market.*
3. *Prioritising energy efficiency, improving the energy performance of our buildings and developing a power sector based largely on renewable sources¹⁷.*

REPowerEU

REPowerEU, launched in May 2022 by the European Commission, proposes an outline of a plan to make Europe independent from Russian fossil fuels, starting with gas, due to the high and volatile energy prices, and security of supply concerns following Russia's unprecedented military attack on Ukraine. Currently, the EU imports 90% of its gas consumption, with Russia providing around 45% of those inputs. Russia also accounts for around 25% of oil and 45% of coal imports. Phasing out dependence on fossil fuels can be done well before 2030, increasing the resilience of the EU-wide energy system based on two pillars:

1. *Diversifying gas supplies, via higher Liquefied Natural Gas (LNG) and pipeline imports of biomethane and renewable hydrogen production and imports from non-Russian suppliers.*
2. *Reducing faster the use of fossil fuels by boosting energy efficiency, increasing renewables and addressing infrastructure bottlenecks.*

In September 2023, the European Parliament agreed to update the RED. The updates including raising the share of renewables in the EU's final energy consumption to 42.5% by 2030 with Member States encouraged to achieve 45% and a more efficient approval procedure for deploying renewables in Europe. In addition, as a part of the REPowerEU Plan, the European Commission has proposed a series of additional targeted amendments to the renewable energy directive to reflect the ongoing changes in the energy landscape and the continued invasion of Ukraine. This will make the sector more efficient and reach the set goals faster.

In addition, the REPowerEU Plan highlights the overriding public interest in achieving renewable energy targets. The REPowerEU Plan states that: "the revised proposal operationalises the principle of **renewable energy as an overriding public interest**, introduces the designation of 'go-to' areas and other ways to shorten and simplify permitting while also minimising potential risks and negative impacts on the environment." This highlights the importance of public interest and incentive to achieve the renewable energy target, highlighting the importance of appropriate designation of sufficient areas for wind energy development by local authorities within the EU.

2.3.1.2 Project Compliance with EU Policy

The Proposed Project is fully aligned with, and supported by, relevant EU energy and climate policy. It will contribute to the objectives of the 2030 Climate and Energy Framework, including the EU-wide binding targets of achieving at least 27% renewable energy and 27% energy efficiency by 2030. Additionally, the Proposed Project supports the increased ambition to raise the share of renewables in the EU's energy mix from 32% to a minimum of 42.5% by 2030.

The EU Energy Roadmap 2050, which outlines pathways to meet long-term climate and energy goals, highlights that all projected scenarios foresee renewables as the dominant source of energy supply by 2050. As such, the Proposed Project aligns with this long-term vision.

¹⁷ https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/energy-and-green-deal_en

Regulation 2022/2577 introduced significant measures to facilitate the acceleration of the deployment of renewable energy, including an obligation on member states to prioritise the roll out of renewable energy projects when balancing competing legal interests. Furthermore, the RePowerEU plan, which aims to enhance energy security and accelerate the integration of renewables into the EU grid, explicitly calls for faster permitting processes for renewable projects and improvements to grid infrastructure. The Proposed Project directly supports these objectives and is therefore considered to be strongly underpinned by current EU energy policy.

The provisions of Regulation 2022/2577 and the RePowerEU Plan are applicable to the current planning application and EIAR, and they provide further justification for granting consent for the Proposed Project.

2.3.2

National Renewable Energy Policy

White Paper on ‘Ireland’s Transition to a Low Carbon Energy Future’ 2015-2030

On 19th June 2020, the updated Green Paper on Energy Policy in Ireland was published. The Paper which was originally published on 14th May 2014 marked the start of a public consultation process on the future of Ireland’s energy policy over the medium to long-term. The Department of Communications, Climate Action & Environment (now the Department of the Environment, Climate and Communications or DECC) acknowledged that energy is an integral part of Ireland’s economic and social landscape and that *“a secure, sustainable and competitive energy sector is central to Ireland’s ability to attract and retain Foreign Direct Investment and sustain Irish enterprise. The three key pillars of energy policy are to focus on security, sustainability and competitiveness”*.

Following an extensive consultation process, the Government published the White Paper ‘Ireland’s Transition to a Low Carbon Energy Future 2015–2030’ in December 2015. This document, produced by the then Department of Communications, Energy and Natural Resources (DCENR), provides an updated energy policy framework to guide Ireland’s transition to a low-carbon energy system through 2030 and towards 2050. It outlines the Energy Vision 2050, which targets an 80–95% reduction in energy sector GHG emissions (compared to 1990 levels), primarily through increased renewable electricity generation and greater use of electricity and bioenergy in heating and transport.

The policy framework was developed to guide policy and actions that the Irish Government intends to take in the energy sector up to 2030 and also reaching out to 2050 to ensure a low carbon future that maintains Ireland’s competitiveness and ensures a supply of affordable energy. The Energy Vision 2050, as established in the White Paper, describes a *‘radical transformation’* of Ireland’s energy system which will result in GHG emissions from the energy sector reducing by between 80% and 95%, compared to 1990 levels. The paper advises that a range of policy measures will be employed to achieve this vision with emphasis on the generation of electricity from renewable sources, which there are plentiful indigenous supplies and increasing the use of electricity and bio energy to heat homes and fuel transport.

The White Paper highlights onshore wind as Ireland’s leading and most cost-effective renewable resource, noting its high efficiency and lower support costs due to the country’s strong wind profile. It also recognises the growing competitiveness of solar technology and its potential to enhance energy security, meet renewable targets, and stimulate economic growth.

“Onshore wind continues to be the main contributor (18.2% of total generation and 81% of RESE in 2014). It is a proven technology and Ireland’s abundant wind resource means that a wind generator in Ireland generates more electricity than similar installations in other countries. This results in a lower cost of support.”

National Energy Security Framework

More recently, the National Energy Security Framework (NESF) (DECC, April 2022) highlights clearly the impacts the Russian invasion of Ukraine and the resulting war has had on Europe's energy system. The resulting decision by the European Union to phase out the import of Russian gas, oil and coal has brought to the fore the importance of security of supply and how energy policy is designed for long-term resilience. It takes account of the need to decarbonise society and economy, to reduce Ireland's emissions by 51% over the decade to 2030 and reach net-zero emissions by 2050. According to the SEAI's Energy in Ireland (2024) report, oil accounts for 49% of Ireland's primary energy requirement making it one of the highest rates of oil dependency in the EU. The International Energy Agency, of which Ireland is a member country, includes a 10-point plan to cut oil use which calls for an acceleration in the deployment of wind and solar projects. Ireland's response per the NESF is set out over three themes:

- Theme 1 – managing the impact on consumers and businesses.
- Theme 2 – ensuring security of energy supply in the near-term.
- Theme 3 – reducing our dependency on imported fossil fuels in the context of the phasing out of Russian energy imports across the EU.

In relation to Theme 3, the NESF highlights that replacing fossil fuels with renewables, including wind energy, will be a focus area of work. The NESF calls for *“Supportive policies across Government and State agencies”* which *“can reduce barriers and fast track permitting for renewable energy generation projects. Similarly, renewable energy developers need to match this through taking a leadership role in delivering high quality applications to relevant consenting authorities, meeting project milestones on time and minimising delays.”* There are a number of 'Responses' set out in the NESF aimed at reducing reliance on imported fossil fuels and increasing indigenous renewable energy generation, including Response 25 which seeks the alignment of all elements of the planning system to support accelerated renewable energy development.

The Government published an update to this in November 2023 which outlines a new strategy to ensure energy security in Ireland for this decade, while ensuring a sustainable transition to a carbon neutral energy system by 2050. The Energy Security Package emphasizes the need to prioritize, monitor, and regularly review energy security during the transition period. It proposes measures focusing on:

3. *Reduced and Responsive Demand*
4. *Transition to Renewables*
5. *Building More Resilient Systems*
6. *Implementing Robust Risk Governance*

The report details mitigation measures under each area, such as expanding indigenous renewable energy capacity, diversifying fuel sources, and enhancing governance structures. Lessons from European energy supply disruptions and domestic electricity sector challenges inform the strategic approach.

Six key pillars guide the response and recommendations outlined in 'Energy Security in Ireland to 2030', which includes a public consultation and external reviews. The Government plans to release follow-up reports every five years, with implementation oversight by the Government's Energy Security Group.

Having regard to the above, it is clear that the provision of additional renewable energy generation, such as the Proposed Project, is vital in helping to secure the State's energy supplies and reduce reliance on imported fossil fuels.

Energy Security in Ireland to 2030 – Energy Security Package

Published in 2023, the energy security package titled ‘Energy Security in Ireland to 2030’ builds on the policies set out in the NESF. The energy security package is based on the recognition of the following fact:

“Ireland’s future energy will be secure by moving from an oil, peat, coal and gas-based energy system to an electricity-led system maximising our renewable energy potential, flexibility and being integrated into Europe’s energy systems.”

Independent research undertaken as part of the package, McCarthy Report¹⁸, provides an analysis of developments in the electricity sector in Ireland. The McCarthy Report makes the following observation in relation to the consenting process:

“The problem of delays encountered by major infrastructure projects, including in the electricity system, due to planning and environmental consent issues was evident. They had been commented upon by the International Energy Agency in its 2019 review of Ireland which named planning delays as the principal challenge to delivery of policy for the sector.”

A key finding from the technical analysis conducted as part of the energy security package is the interdependence of energy security on two essential pillars: *‘harnessing our indigenous renewable energy resources at speed and at scale and the rapid electrification of energy demand’*. As such, the energy security package provides additional measures to supplement the existing measures introduced under previously published government policy documents. The additional measures most relevant to the Proposed Project is Action 10 which is *“To implement Planning and Consenting System Reforms and provide greater certainty to the sector.”*

The energy security package aims to ensure that the planning system is fully aligned and resourced to fully support accelerated renewable energy development. It also aims to ensure renewable energy projects are prioritised in line with the recast RED and RePowerEU.

The Proposed Project will directly support the government's goal of enhancing national energy security by acting as a domestic source of renewable electricity. By supplying clean energy to the national grid, it will contribute to the transition toward a renewables-driven energy system.

2.3.2.2 Project Compliance with the National Renewable Energy Policy

The NESF outlines several steps to accelerate Ireland's shift to renewable energy initiatives. It is evident that the Proposed Project aligns with this framework by increasing the proportion of renewable energy on the national grid, thus expediting Ireland's transition to a low-carbon energy future.

2.4 Climate and Renewable Energy Target Progress

At a European level, the latest data shows that, as of 2023, 24.5% of energy consumed in the EU came from renewable energy sources¹⁹. This represents an increase of 1.5% compared to 2022 levels. While progress is being made to increase the share of renewable energy, it is clear that all EU member states need to intensify their efforts to collectively comply with the target of 42.5% set in the latest revision of the renewable energy directive.

Of the 27 EU member states, Ireland had one of the lowest proportions of renewable energy at 15.3% in 2023²⁰. It is evident that Ireland is not performing well when compared against our European

¹⁸ <https://www.gov.ie/pdf/?file=https://assets.gov.ie/276441/eb496e01-5c01-4594-af09-74342b4ac971.pdf#page=null>

¹⁹ https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Renewable_energy_statistics

²⁰ https://ec.europa.eu/eurostat/databrowser/view/hrg_ind_ren/default/table?lang=en

counterparts and that urgent action is required to increase the overall share of renewable energy in our gross final energy consumption. When it comes to the share of renewable energy in electricity, Ireland does perform better generating 36.8% in 2022, but still below the EU average of 41.1%²¹.

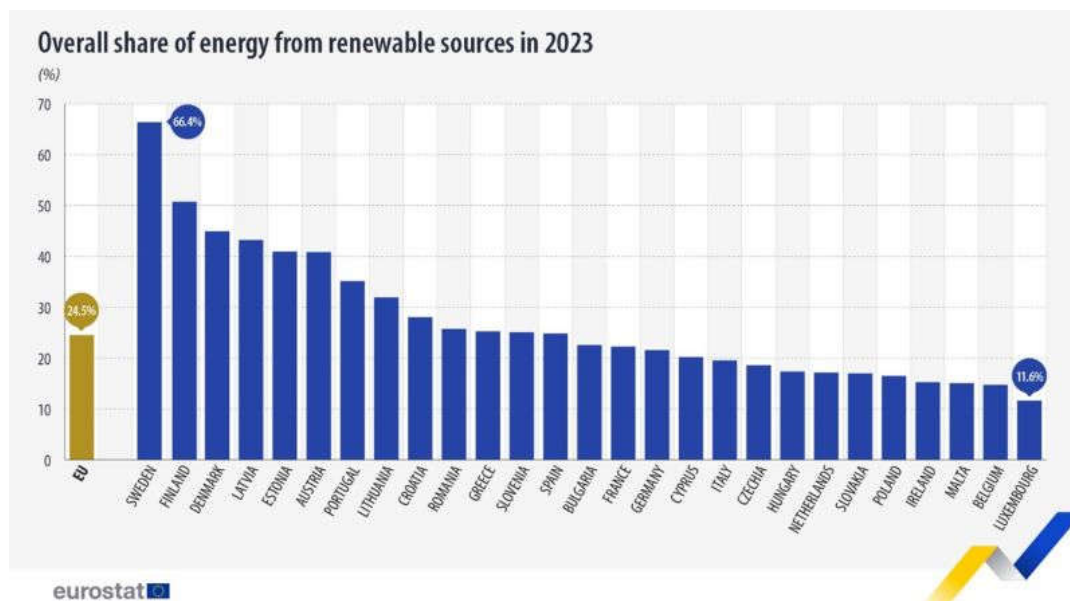


Figure 2-1: Overall share of energy from renewable sources (source: Eurostat)

Ireland's Greenhouse Gas Emissions Projections 2024-2055 (May 2025)

The EPA published Ireland's Greenhouse Gas Emission Projections and at the time of writing, the most recent report, 'Ireland's Greenhouse Gas Emissions Projections 2024-2055' in May 2025. The report includes an assessment of Ireland's progress towards achieving its emission reduction targets out to 2030 set under the EU Effort Sharing Regulation (ESR).

The EPA has produced two scenarios in preparing these GHG emissions projections: a "With Existing Measures" (WEM) scenario and a "With Additional Measures" (WAM) scenario. These scenarios forecast Ireland's GHG emissions in different ways. The WEM scenario assumes that no additional policies and measures, beyond those already in place by the end of 2023. This is the cut off point for which the latest national GHG emission inventory data is available, known as the 'base year' for projections. The WAM scenario has a higher level of ambition and includes the latest government policies and measures (at the time the Projections are compiled) to reduce emissions such as those in Ireland's CAP25.

The EPA Emission Projections Update notes the following key trends:

- Ireland is not on track to meet the 51% emissions reduction target (by 2030 compared to 2018) based on these projections which include the CAP25 measures. GHG emissions are projected to be 9% to 23% lower by 2030 (compared to 2018), placing Ireland further from the 2030 National climate target when compared to previous assessments.
- Budget period 1, 2021-2025, of 295 Mt CO₂eq is projected to be exceeded by 8 to 12 Mt CO₂eq. Budget period 2, 2026-2030 of 200 Mt CO₂eq is also expected to be exceeded by a significant margin of 77 to 114 Mt CO₂eq (with carryover from Budget period 1).
- Ireland will not meet its non-Emissions Trading Scheme (ETS) EU targets of a 42% emissions reduction by 2030 even with flexibilities applied. The assessment shows a reduction by 13% to 26% by 2030 with the use of flexibilities.

²¹ https://ec.europa.eu/eurostat/databrowser/view/hrg_ind_ren_custom_9264705/default/bar?lang=en

- Sectoral emissions ceilings for 2025 and 2030 are projected to be exceeded by the Buildings, Electricity, Industry and Transport sectors.
- Emissions from the Energy Industries sector are projected to decrease by between 59 and 68%. Renewable energy generation at the end of the decade is projected to range from 60 to 68% of electricity generation.

As decarbonising electricity generation will have a significant positive contribution in achieving Ireland's emissions it is clear that additional renewable energy production, such as that of the Proposed Project, must be encouraged and supported if carbon saving targets are to be met.

National Energy Projections (November 2024)

The National Energy Projections report, published by the SEAI in November 2024, sets out the most recent updates to Ireland's progress towards its binding European and National renewable energy targets.

In 2023 RED II set an EU wide target for overall RES of 32% RES in 2030. Member states set their national contributions to the EU-wide target, with Ireland setting its at 34.1% in 2030. RED III increased the binding EU-wide target for overall RES to at least 42.5% with Ireland subsequently increasing the target to 43% in 2030.

The decarbonisation of the electricity generation is critical considering the need to electrify other sectors such as heating and transport in order to achieve the sectoral decarbonisation targets. By 2030, renewable energy sources are anticipated to dominate electricity generation, particularly experiencing a significant surge later in the decade attributed to the integration of substantial offshore wind projects.

The most notable conclusion drawn from the Report is the significant gap between projections across both the WEM and WAM scenarios and the legally binding national and EU emission reductions targets. The Report states that even with full implementation of CAP24, Ireland is projected to miss its agreed national and EU 2030 targets for energy efficiency, renewable energy share and greenhouse gas emissions reduction.

Figure 1.27 of the Report, copied below, clearly illustrates the gap between the current installed wind capacity and the relevant Climate Action Plan (CAP) targets.

Figure 1.27: Ireland's installed wind capacity with 2024 estimates, projections to 2030, CAP targets

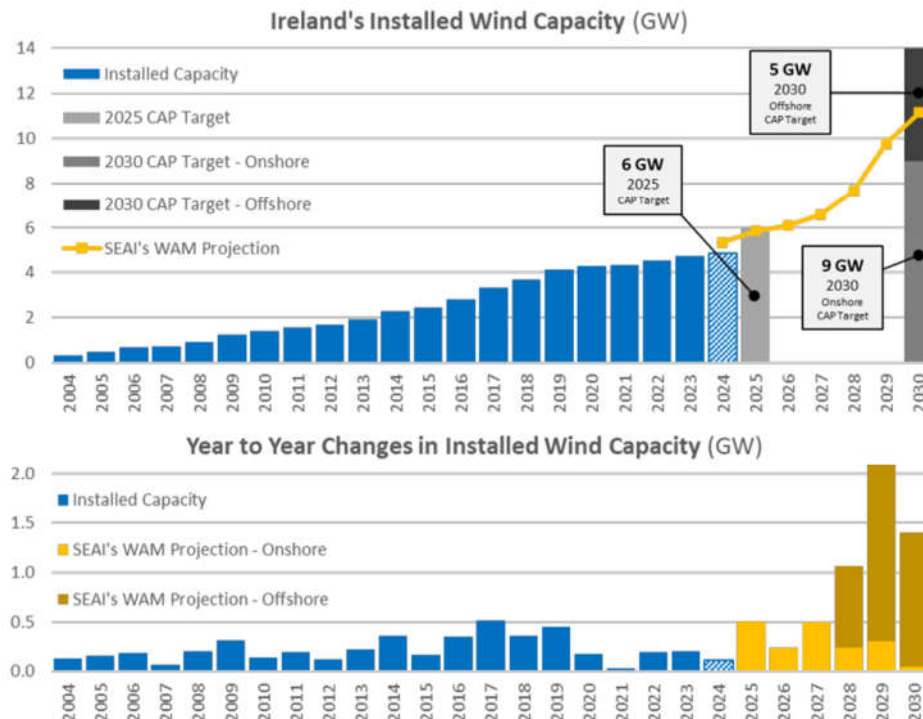


Figure 2-2: Ireland's installed wind capacity with 2024 estimates, projections to 2030, CAP targets

The SEAI projections explore the risk scenarios WEM and WAM, the aim being to address the gap between current policy trajectories and the most ambitious planned policies scenarios. The SEAI WEM scenario modelling considers CAP23 and the SEAI WAM scenario modelling considers CAP24. The SEAI projections under the WAM scenario indicate a total installed capacity of 11.2GW by the end of 2030. The Report goes on to note that “Over the last 10 years, Ireland has added wind capacity at an average rate of 0.26GW per annum, although this has dropped to a rate of 0.14GW over the last 5 years. To align with the pace of the WAM projections needed to deliver on the 80% RES-E target, the roll out of onshore wind capacity needs to return to the rate previously achieved between 2016 and 2019...”

The Report projects GHG emissions under the WEM and WAM scenarios. It notes that since April 2023 there has been a “significant increase in net electricity imports across the interconnectors with the UK” and “electricity net-imports were far higher than other years, and higher than projected in the WEM or WAM scenarios...”. The Report considers the emission ceiling of the first two carbon budget periods – carbon budget 1 (CB1) ceiling 2021-2025 (five year cumulative) (MtCO₂eq) and carbon budget 2 (CB2) ceiling 2026-2030 (five year cumulative) (MtCO₂eq) in both the WEM scenario and WAM scenario. In the WEM scenario, total greenhouse gas emissions exceed CB1 by 9% by 2025. This overshoot means that 13% of the CB2 budget is consumed before the CB2 period begins. The second sectoral ceiling is then breached during 2028, with the exceedance reaching 27% by 2030. Under the WAM scenario the CB1 ceiling is exceeded by 6% and this overshoot means that 9% of the CB2 budget is consumed before the CB2 period begins. In this scenario the CB2 ceiling is exceeded by 17% by 2030.

It is clear from the projections outlined above that unprecedented action is required as soon as possible: “Where any exceedance occurs, steeper reductions are required to compensate, leading to a larger reduction required by 2030.”

Energy in Ireland (December 2024)

In December 2024, the Sustainable Energy Authority of Ireland (SEAI) released an annual publication ‘*Energy in Ireland*’ report which looks at trends in national energy use and at the underlying driving forces, such as the economy and weather, and more recently the impacts of high energy prices. It also examines GHG emissions from energy use, energy security, cost competitiveness, and Ireland’s progress towards EU renewable energy targets.

The Report identifies that Ireland’s national energy-related emissions in 2023 were at their lowest level in over 30 years. Energy-related emissions in 2023 were 31.4 MtCO₂eq, down 8.3% on 2022 levels, and lower even than those observed during the height of COVID impacts in 2020. Energy-related emissions fell by over 2.8 MtCO₂eq in 2023 - the largest annual reduction observed in 12 years. The following are some of the key points, relating to renewable energy and energy emissions:

- Ireland’s national energy-related emissions have fallen for seven of the last ten years.
 - 14.1% of Ireland’s primary energy was renewable in 2023, with fossil fuel remaining the dominant source of Ireland’s energy.
 - Wind generation provided 33.7% of electricity supply in 2023.
 - 2023 electricity emissions were 7.6 MtCO₂eq, the lowest on record, down 22% on 2022 levels.
 - 2023 was the first year in which fossil fuel generation accounted for less than half of Ireland’s gross electricity supply.
- In 2023, Ireland had 4.74 GW of installed wind capacity, up 4.5% on the previous year.

The Report states that over the last 10-years, Ireland has added wind capacity at an average rate of 0.26 GW per annum, although this has dropped to a rate of 0.14 GW over the last 5-years. To align to the pace of the WAM scenario projections needed to deliver on the 80% RES-E target, the roll-out of onshore wind capacity needs to return to the rate previously achieved between 2016 and 2019. The Report then goes on to state the following:

“Increasing wind generation through added wind infrastructure is key to decarbonising Ireland’s electricity supply. The decarbonisation of electricity maximised the positive impact of sustainability technologies like heat pumps and electric vehicles. The recent slow-down in added wind capacity is impacting Ireland’s transition to a sustainable energy future. Renewable capacity must be added faster than electricity demand increases. We must do everything we can to support the roll-out of both onshore and offshore wind and grid-connected solar PV capacity”. (emphasis added)

The Climate Change Advisory Council Annual Review 2024

The Climate Change Advisory Council (CCAC) open their ‘Annual Review 2024-Summary for All’ quite starkly, stating “... ***progress to reduce emissions is not sufficient for Ireland to meet its national and EU climate obligations. Reliance on fossils fuels needs to end, and urgent action is required to ensure that people, places and nature can adapt to the changing climate and prepare for rapidly emerging climate risks. The current rate of policy implementation is too slow and fragmented,*** and more effective engagement across all segments of policy and society is required to empower sustainable decision-making and to understand and remove barriers to action.” (emphasis added)

In addition, the standout recommendation from the CCAC is that “*So that Ireland can end its reliance on fossil fuels, Government should cease subsidising fossil fuel consultation and increase funding and make it more accessible to enable and accelerate the rapid uptake of low-carbon technologies and alternatives across all sectors.*”

In relation to the electricity sector specifically planning reform continues to be cited as a key area requiring urgent attention.

The Climate Change Advisory Council Annual Review 2025 – Electricity

The CCAC published its annual review in April 2025 where it outlines detailed observations and recommendations for the Electricity sector in Ireland. This review emphasises the urgent need for Ireland to accelerate its transition to renewable energy to meet its 2030 electricity capacity targets and adhere to sectoral emissions ceilings. The CCAC states:

“To meet the carbon budgets, emissions from the Electricity sector will need to reach zero by the end of the 2030s. In 2024, electricity emissions fell by approximately 7% relative to 2023, reaching the lowest level since record-keeping began in 1990. This was driven by a continued decline in the use of coal for electricity generation, coupled with a notable rise in imported electricity for the second consecutive year. Renewable energy is still not being rolled out fast enough, and insufficient investment in the electricity grid means that some of the renewable energy we currently generate cannot be used. Emissions are currently projected to exceed the sectoral emissions ceiling, even in the most optimistic scenario.”

Key observations in relation to Renewable Electricity are outlined below:

- In 2024, 1.6 GW of onshore wind (0.7 GW) and solar (0.9 GW) projects received planning permission, but only 0.5 GW (0.2 GW wind, 0.3 GW solar) were connected, which is well below the 1.8 GW annual target needed to achieve 2030 targets.
- Grid constraints led to 1,266 GWh (10.1% of the total available wind energy) of wind and energy being curtailed.
- During 2024, an additional 0.5 GW (0.2 GW wind and 0.3 GW solar) of new utility-scale renewable capacity was connected, representing a decrease compared with the 0.6 GW connected in 2023 and significantly below the 1.8 GW annual average increase in capacity that is required to meet 2030 targets.

Ireland’s Climate Change Assessment (January 2024)

In January 2024, the EPA published Ireland’s Climate Change Assessment (ICCA). This assessment provides a comprehensive overview and breakdown of the state of knowledge around key aspects of climate change with a focus on Ireland. The ICCA report is presented in four volumes.

- Volume 1: Climate Science – Ireland in a Changing World
- Volume 2: Achieving Climate Neutrality in 2050
- Volume 3: Being Prepared for Ireland’s Future
- Volume 4: Realising the Benefits of Transition and Transformation

The ICCA Synthesis Report states that having peaked in 2001, Ireland’s GHG emissions have reduced in all sectors except agriculture. However, Ireland currently emits more GHGs per person than the EU average. The ICCA Synthesis Report goes on to state that there has been an identified gap in policy that indicates that Ireland will not meet its statutory GHG emission targets. Achieving net-zero carbon dioxide emissions by 2050 requires significant and unprecedented changes to Ireland’s energy system. Policies tailored to suit different stages of technology development are critical for achieving a net zero energy system. Established technologies, such as wind energy, solar photovoltaics and bioenergy will be key in meeting short-term emission reduction targets (i.e. 2030), whereas offshore wind infrastructure is expected to be the backbone of future energy systems. This can only be achieved with appropriate support schemes, regulation and investments for synergistic growth of offshore wind and other renewable technologies.

In relation to Ireland’s target of achieving net-zero carbon dioxide emissions by 2050 and the role renewable energy will contribute to this, the ICCA Synthesis Report states the following:

“There are well-established ‘no-regret options’ that need to happen now, which can get us most of the way to net zero carbon dioxide emissions. Beyond that, there are ‘future energy choices’

relating to the scale and magnitude of technologies that will help get us all the way. Ireland's no-regret options are demand reduction (e.g. through energy efficiency and reduced consumption), electrification (e.g. electric vehicles and heat pumps), deployment of market-ready renewables (e.g. wind energy and solar photovoltaics) and low-carbon heating options (e.g. district heating), while our future choices include hydrogen, carbon capture and storage, nuclear energy and electro fuels. Renewable energy can increasingly provide our future energy needs but will need to be complemented with carbon dioxide removals to achieve a net zero energy system in hard-to-abate sectors”.

2.5 Planning Policy Context

2.5.1 Introduction

This section of the EIAR provides the strategic planning context of the Proposed Project. As is examined below, the Proposed Project is in line with national, regional and local policies, frameworks, guidelines and plans. This section has been broken down to the following sections:

- National Policy Context
- Regional Policy Context
- Local Policy Context
- Other Relevant Material Considerations

As a renewable energy project, the Proposed Project is consistent with the overall national policy objectives to increase penetration and deployment of renewable energy resources and has been designed in the context of the relevant wind energy and other guidelines. The specific compliance with the National, Regional and Local/County Development Plan provisions is dealt with in detail in the sections below.

2.5.2 National Planning Policy

The Planning and Development Act 2024

The Planning and Development Act 2024 (the new Act) was signed into law by the President on the 17th of October 2024, following its passage through both Houses of the Oireachtas. At the time of lodgement of this planning application, the Planning and Development Act 2000 (as amended) remains in place until the new Act is commenced by Ministerial Orders, with the Government indicating that this will be done on a phased basis.

The Government has approved an Implementation Plan for the new Act, which sets out the schedule for its phased commencement. The Implementation Plan also outlines a series of initiatives aimed at supporting training and stakeholder engagement across the planning sector to ensure a smooth transition to the new legislative framework. Concurrently, work is ongoing to revise and update the supporting Regulations that will underpin the operation of the new Act.

National Planning Framework: Project Ireland 2040

The National Planning Framework (NPF), published in February of 2018, forms the top tier of the national planning policy structure which establishes the policy context for the Regional Spatial and Economic Strategies (RSES) and local level development plans. In an effort to move away from developer led system to one informed by the needs and requirements of society up to 2040, a number of objectives and policies have been put in place in the NPF in order for the country to grow and develop in a sustainable manner, including:

- Developing a new region-focused strategy for managing growth;
- Linking this to a new 10-year investment plan, the Project Ireland 2040 National Development Plan 2018-2027;
- Using state lands for certain strategic purposes;
- Supporting this with strengthened, more environmentally focused planning at local level; and
- Backing the framework up in law with an Independent Office of the Planning Regulator.

The NPF notes that the population of Ireland is projected to be roughly 5.7 million by 2040. This population growth will place further demand on both the built and natural environment. In order to strengthen and facilitate more environmentally focused planning at the local level, the NPF states that future planning and development will need to:

“Tackle Ireland’s higher than average carbon-intensity per capita and enable a national transition to a competitive low carbon, climate resilient and environmentally sustainable economy by 2050, through harnessing our country’s prodigious renewable energy potential.”

A key focus throughout the NPF is the fostering of a transition toward a low carbon, climate-resilient society. In this regard, one of the stated key elements of the NPF is an Ireland which has a secure and sustainable renewable energy supply and facilitates the ability to diversify and adapt to new energy technologies. Key features identified in the NPF to facilitate the transition towards a low carbon energy future include:

- A shift from predominantly fossil fuels to predominantly renewable energy sources.
- Increasing efficiency and upgrades to appliances, buildings and systems.
- Decisions around development and deployment of new technologies relating to areas such as wind, smart grids, electric vehicles, buildings, ocean energy and bio energy.
- Legal and regulatory frameworks to meet demands and challenges in transitioning to a low carbon society.

Relevant to the Proposed Project, the **National Strategic Outcome 8** (Transition to Sustainable Energy), notes that in creating Ireland’s future energy landscape, new energy systems and transmission grids will be necessary to enable a more distributed energy generation which connects established and emerging energy sources, i.e. renewables, to major sources of demand. The successful transition to a low carbon power system will depend on the pillars of 1) *Sustainability*, 2) *Security of supply* and 3) *Competitiveness*. A common theme underpinning these pillars is the need for a fit-for-purpose transmission and distribution energy network. Specifically, the NPF states that reinforcement of the distribution and transmission network to facilitate planned growth and distribution of a more renewables focused source of energy across the major demand centres, e.g. the functional purpose of the extant grid connection.

The following National Policy Objectives (NPO) are applicable to the Proposed Project.

- **NPO 21:** Enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services, including ICT-based industries and those addressing climate change and sustainability.
- **NPO 54:** Reduce Ireland’s carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.

Also relevant to the Proposed Project, Ireland’s national energy policy under **Objective 55** aims to ‘promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050’. The NPF aims to ensure that decisions that are made today meet our future needs in a sustainable manner.

An overarching objective of the NPF is to foster a transition toward a low carbon, climate-resilient society, which reflects the policy ethos established at the European level of governance (e.g. climate change and renewable energy targets). In this regard, one of the key themes of the NPF is the realisation of an Ireland which has a secure and sustainable renewable energy supply and the ability to diversify and adapt to new energy technologies. The NPF references the national Climate Policy Position which established the fundamental objective of achieving transition to a competitive, low carbon, climate resilient and environmentally sustainable economy by 2050. The NPF emphasises that rural areas have a strong role to play in securing a sustainable renewable energy supply for the country and acknowledges that *“rural areas have significantly contributed to the energy needs of the country and continue to do so”*. In this regard, the NPF states:

“In meeting the challenge of transitioning to a low carbon economy, the location of future national renewable energy generation will, for the most part, need to be accommodated on large tracts of land that are located in a rural setting, while also continuing to protect the integrity of the environment”.

The NPF acknowledges that GHG emissions from the energy sector must be reduced by at least 80% by 2050 when compared to 1990 levels while ensuring a secure supply of energy exists. New energy systems and the maintenance / safeguarding of existing grid assets will be necessary for a more distributed, renewables focused energy system required to harness Ireland’s considerable indigenous energy sources and *“connect the richest sources of that energy to the major sources of demand”*.

In regard to the above, it is clear that the provision of new renewable energy generation is in line with the aims and objectives of the NPF which seeks to transition to a low carbon economy.

National Planning Framework First Revision (2025)

On the 8th 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. In order to strengthen and facilitate more environmentally focused planning at the local level, the Revised NPF states that future planning and development will need to:

“Tackle Ireland’s higher than average carbon-intensity per capita and enable a national transition to a competitive low carbon, climate resilient and environmentally sustainable economy by 2050, through harnessing our country’s prodigious renewable energy potential.”

National Strategic Outcome 8 (*‘Transition to a Carbon Neutral and Climate Resilient Society’*) notes that in creating Ireland’s future energy landscape, new energy systems and transmission grids will be necessary to enable a more distributed energy generation which connects established and emerging energy sources, i.e. renewables, to major sources of demand.

Chapter 9: Climate Transition and Our Environment, aims to address key national environmental challenges including the transition to a climate neutral economy, sustainable land management, renewable energy and resource efficiency. As per **NPO 70**, the Revised NPF highlights the importance of renewable energy infrastructure to achieve national climate action targets.

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

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 Project 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. In regard to this, it is clear that the provision of new renewable energy generation through the Proposed Project is in line with aims and objectives of the Revised NPF, which seeks to transition to a carbon neutral economy.

National Development Plan 2021-2030

The National Development Plan 2021 – 2030 (NDP) was published on the 4th of October 2021 and sets out the major public investment projects identified by the 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 Proposed Project, climate change.

Reflecting on the recent publication of the IPCC's 6th Assessment Report, the NDP notes that the Irish Government is fully committed to 'playing its part' to ensure that the worst climate change damage can be avoided, e.g. significant reductions in CO₂ and other GHG emissions as assisted by the achievement of both European and national renewable energy targets. Specifically, the NDP states that,

"The next 10 years are critical if we are to address the climate crisis and ensure a safe and bright future for the planet, and all of us on it.

The investment priorities included in this chapter [Ch. 13] must be delivered to meet the targets set out in the current and future Climate Action Plans, and to achieve our climate objectives. The investment priorities represent a decisive shift towards the achievement of a decarbonised society, demonstrating the Government's unequivocal commitment to securing a carbon neutral future."

Notwithstanding this, the NDP acknowledges that it is not its role to set out a specific blueprint for the achievement of Ireland's climate targets; but as noted above, facilitate capital investment allocations for the climate and environmental strategic priorities.

One of the NDP's strategic climate priorities is 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 ambitious and an explicit driver for the deployment of new renewable generators e.g. the Proposed Project, and the safeguarding / maintenance of existing assets. It is noted that the reliability of electricity supplies will also be strengthened through investment in the electricity transmission and distribution grid. The focus of investment in regulated network infrastructure is to contribute to a long-term, sustainable and competitive energy future for Ireland.

National Development Plan – 2025 Review

The National Development Plan Review 2025 sets out a comprehensive capital investment framework for the period 2026–2035, totalling €275.4 billion. Within this framework, wind energy is recognised as a key enabler of the State’s legally binding commitment to reduce greenhouse gas emissions by 51% by 2030, including a 75% reduction in emissions from the electricity sector. To support the expansion of renewable electricity generation, the Government has allocated €3.5 billion in equity funding to ESB Networks and EirGrid to enhance grid transmission and distribution infrastructure, which will directly facilitate increased integration of wind energy developments such as the Proposed Project.

2.5.2.2 Project Compliance with National Policy

With regard to the above, it is considered that the Proposed Project is in line with and supported by the NPF, Revised NPF, and the NDP.

The Revised NPF projects a population increase of approximately one million people by 2040 and therefore recognises the strain and demand this will put on Ireland’s energy system. In order to ensure Ireland delivers on our renewable energy and carbon emission reduction targets, the NPF recognises the need for increased renewable energy onto the national grid.

The NDP is clear in its priority to reach a low-carbon, climate resilient society over the lifetime of the NDP. The Proposed Project, if permitted, will provide clean, renewable electricity to the national grid, furthering development objectives of the NDP, namely the target to increase the share of renewable electricity up to 80% by 2030.

This shift from fossil fuels is dependent upon schemes such as the one proposed to generate renewable energy. Given the projected population increase, it is considered that if the share of renewable energy onto the grid is not increased, Ireland will fail to reach the National and International targets on emission reductions. The addition of 9 no. wind turbines, with an estimated electricity generation capacity of 54-64.8 MW, will contribute to Ireland's national targets and support the country in meeting its renewable energy and carbon emission reduction goals at the EU level.

2.5.3 Regional Policy

Northern and Western Regional Assembly Regional Spatial & Economic Strategy

The Northern and Western Regional Assembly (NWRA) was established in 2015, the Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region (Galway, Roscommon, Leitrim, Sligo, Donegal, Monaghan, Mayo and Cavan) came into effect in January of 2020. The RSES provides a long-term, strategic development framework for the future physical, economic and social development of the Northern and Western Region. The RSES seeks to achieve balanced regional development and full implementation of Project Ireland 2040 – the National Planning Framework.

The principal statutory purpose of the RSES is to support the implementation of the Project Ireland 2040 NPF and NDP and the economic policies and objectives of the Government. The RSES aims to build on the region’s strengths and potential to become a more prosperous, sustainable, climate resilient and attractive region for the benefit of all its people up to 2040 and beyond.

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. 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 Regional Policy Objectives (RPOs) 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;*
 - *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*
- **RPO 4.18:** *Support the development of secure, reliable and safe supplies of renewable energy, to maximise their value, maintain the inward investment, support indigenous industry and create jobs.*

As indicated above, there is a clear policy support within the region to identify and capitalise on emerging opportunities associated with the transition to a decarbonised economy such as renewable energy generation. It should be noted, however, that the existing transmission network within the region is predominantly 110kV with very little higher capacity 220kV and 400kV transmission infrastructure. As such, the RSES endorses the future development of the grid in order to safely facilitate more diverse power flows from surplus regional generation and also to facilitate future growth in electricity demand:

- **RPO 8.3:** *The Assembly support the necessary integration of the transmission network requirements to allow linkages with renewable energy proposals at all levels to the electricity transmission grid in a sustainable and timely manner.*
- **RPO 8.4:** *That reinforcements and new electricity transmission infrastructure are put in place and their provision is supported, to ensure the energy needs of future population and economic expansion within designated growth areas and across the Region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs. Ensure that development minimises impacts on designated areas.*

The RSES is ultimately supportive of the future growth of renewable energy technology in the region and sets a clear precedent to identify and capitalise on those opportunities associated with the transition to renewable energy generation.

2.5.3.2 Project Compliance with Regional Policy

The RSES for the Northern and Western Region states that the region has a crucial role to play in Ireland's transition to a low carbon future. It is considered that the provision of the Proposed Project would facilitate this just transition and is particularly in line with **RPO 4.17** and **4.18** as outlined above.

In the region, a noticeable trend has emerged to recognise and take advantage of emerging opportunities related to the shift towards a decarbonised economy, particularly in the realm of renewable energy generation and therefore the Proposed Project is considered to be in line with Regional Policy.

2.5.4 Local Policy

The Site falls across the administrative area of Galway County Council and therefore, is subject to the planning policies and objectives set out in the Galway County Development Plan 2022-2028.

2.5.4.1 Galway County Development Plan 2022-2028

The Galway County Development Plan 2022 – 2028 (the GCDP) was adopted by the Elected Members of Galway County Council (GCC) 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 is the statutory county development plan in effect for the County and provides the framework against which all planning applications for development in the county are assessed. The policies and objectives set out within the GCDP have maintained strong linkages with the key aims and themes set out within the previous development plan. Climate change is again emphasised as one of the greatest global challenges, with GCC acknowledging that continual action is needed for Galway to become a low carbon and climate resilient county. A Planning Report submitted with this application contains a detailed planning assessment of the Proposed Project against all relevant policies and objectives in the GCDP.

The importance of climate action is outlined at the beginning of ‘Chapter 14: Climate Change, Energy and Renewable Resource’ of the GCDP as it states, “*climate action is integrated into every chapter and strategy of the plan*”. The strategic aim of Chapter 14 is outlined below:

“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.”

Furthermore, the GCDP includes the following policies in relation to climate action and reducing GHG emissions, which aligns the County with wider European, national and regional objectives;

- **CC1: Climate Change** - Support and facilitate the implementation of European, National and Regional objectives for climate adaptation and mitigation taking into account other provisions of the Plan (including those relating to land use planning, energy, sustainable mobility, flood risk management and drainage) and having regard to the Climate mitigation and adaptation measures.
- **CC2: 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.

Section 14.7.2 of the GCDP relates to the sets out the County’s ‘Energy Strategy’, which recognises that an efficient and secure energy supply is essential to the future growth and sustainable development of County Galway:

“Reliable and low-cost energy is essential for a high quality of life for the residents of County Galway and also to ensure that the County is an attractive place in which to do business. However, it is essential to ensure that energy demands are met without compromising environmental quality. Energy efficiency, renewable energy development and progression towards a low carbon economy are therefore central themes of this Plan.”

The GCDP sets out an ‘Energy Expectation’ for Galway to 2028. The relevant expectations and how the Proposed Project is in compliance with these expectations is set out in **Table 2-2** below:

Table 2-2: GCPD Energy Predictions

Energy Expectation	Proposed Project Compliance
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<i>“A reduction in demand for non-renewable energy sources, such as coal and oil, as well as an increased demand for electricity from all sectors, leading to more sustainable energy usage across the county.”</i>	The Proposed Project will generate clean, renewable electricity, which can be integrated into the grid to meet the increasing demand for electricity across various sectors. By supplying sustainable renewable energy, the Proposed Project will reduce the need for non-renewable sources like coal and oil, helping to transition toward cleaner energy usage in the county.
<i>“A significant increase in the demand for electricity is predicted resulting in a decrease in utilisation of fossil fuels. A large factor in this will be the Transport sector, as electric vehicles are developed and become more widespread, the oil usage by the sector is projected to decrease.”</i>	Wind-generated electricity can power electric vehicles (EVs). As wind farms contribute to the grid's capacity, the increase in clean energy availability can support the growth of EVs. This transition from traditional gasoline and diesel vehicles to EVs leads to a decrease in oil usage, especially in the transport sector, and can be supported by renewable electricity generation.
<i>“A significant reduction in the use of coal and peat for home heating is anticipated due to advances in home heating technology, improvements in home insulation and new laws restricting the burning of fossil fuels for home heating due to environmental and climate change obligations.”</i>	Projects such as the Proposed Project are a critical component in decoupling the county from reliance on fossil fuels. By generating renewable energy, wind farms contribute to achieving the long-term goal of replacing fossil fuels with sustainable energy sources. This aligns with the Strategy for Renewable Energy 2012 - 2020, emphasising a transition away from traditional non-renewable fuels in the energy sector.
<i>“In the longer-term fossil fuels will be replaced by renewable energy sources in County Galway in line with the Strategy for Renewable Energy 2012 – 2020 which is aimed at decoupling energy from reliance on fossil fuels.”</i>	

The GCDP recognises the necessity for ‘a secure and resilient supply of energy’ in order to meet the demand for energy which is set to increase in the coming years. As such, there are a number of policies included in the GCDP which directly support the provision of renewable energy developments and associated grid infrastructure, such as the Proposed Project, as set out in **Table 2-3** below.

Table 2-3: Policy Objectives of the GCDP relating to the renewable energy developments

Policy	Description	Proposed Project Compliance
RE1 - Renewable Energy Generation and ancillary facilities	<i>“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.”</i>	If consented and constructed, the Proposed Project will generate renewable electricity which will contribute to national to local renewable energy targets.
RE 2 Local Authority Renewable Energy Strategy	<i>“The policy objectives and Development Management Standards set out in the Local Authority Renewable Energy Strategy for County Galway shall be deemed the policy objectives and development management standards for the purpose of the Galway County Development Plan 2022-2028.”</i>	The Proposed Wind Farm is considered to be in line with the policy objectives of the LARES. The Proposed Wind Farm is primarily located in an area classified as “Open to Consideration” for wind energy development and it is fully in accordance with the relevant development management standards, policies and guidelines.

Policy	Description	Proposed Project Compliance
RE 3 Wind Energy Developments	<i>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.</i>	The Proposed Wind Farm has been designed in accordance with all relevant planning policy requirements including the 2006 Wind Energy Development Guidelines (the Guidelines) and the 2019 draft Wind Energy Development Guidelines (the draft Guidelines). Please refer to the Planning Report enclosed with this application which contains a detailed assessment of the Proposed Wind Farm against all relevant Development Management Standards applicable to the Proposed Wind Farm and demonstrates that the Proposed Project is consistent with all relevant planning policy. A Natura Impact Statement (NIS) has been prepared and submitted with this planning application. Please refer to Chapter 6 of this EIAR and the NIS submitted with this application.
RE 5 Renewable Energy Strategy	<i>Support and facilitate the sustainable development and the use of appropriate renewable energy resources and associated infrastructure within the County having due regard to the Habitats Directive and to the detailed policy objectives and Development Standards set out in the Local Authority Renewable Energy Strategy</i>	This EIAR outlines the expected environmental impact of the Proposed Project. The EIAR also outlines mitigation measures to minimise the impact on the receiving environment. Please refer to the NIS included with this application which assesses the Proposed Project in accordance with the Habitats Directive. A detailed analysis of the Proposed Project against the LARES is outlined in the accompanying Planning Report which demonstrates that the Proposed Wind Farm is consistent with the policy objectives and development standards of the LARES.
RE 7 Renewable Energy Generation – Transition to a Low Carbon Economy	<i>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.</i>	The Proposed Project has an estimated generating capacity of above 50 MW. If consented, this will be transferred to the National electricity grid which will aid with decarbonising the electricity sector.
EG1 Enhancement of Electricity Infrastructure	<i>“Support and promote the sustainable improvement and expansion of the electricity transmission and distribution network that supply the County, while</i>	The Proposed Project includes a 110kV onsite substation and underground electric cabling for connection to the existing Cloon

Policy	Description	Proposed Project Compliance
	<i>taking into consideration landscape, residential, amenity and environmental considerations.”</i>	110kV substation, facilitating the connection and distribution of the renewable energy generated by the Proposed Wind Farm. This grid connection infrastructure will be subject to a separate application, however it is comprehensively assessed within this EIAR.
EG 2 Delivery of Electricity and Gas Infrastructure	<i>Support the provision and extension of electricity and gas transmission networks within the county which are critical to the economic development of the County subject to environmental quality, landscape, wildlife, habitats or residential amenity.</i>	The Proposed Project supports the provision of a secure and reliable electricity transmission infrastructure and transmission grid which is vital to ensure that a reliable electricity supply is available.
EG3 Power Capacity	<i>“To support and liaise with statutory and other energy providers in relation to power generation, in order to ensure adequate power capacity for the existing and future needs of the County”</i>	The Proposed Project will contribute positively to the levels of renewable electricity on the national grid. This will aid in ensuring there is adequate capacity for the growing energy needs of County Galway and the country as a whole.

As demonstrated above, the Proposed Project is consistent with objective of the GCDP to increase deployment of renewable energy resources in the context of climate mitigation, renewable energy targets, and sustainability as referenced in the preceding sections of this EIAR Chapter.

2.5.4.2 Local Authority Climate Action Plan

The Galway County Council Local Authority Climate Action Plan 2024-2029 (Galway LACAP), published in March 2024, sets out GCC’s intentions to create a low carbon and climate resilient County. It also aligns itself with international and national policy regarding climate action, highlighting the Climate Act and Ireland’s legally binding target of a 51% reduction in GHG emissions by 2030. The ‘Mission Statement’ of the Galway LACAP is defined as follows;

“Deliver and enable transformative change and measurable climate action across our county and within our own organisation, ensuring a just transition to a carbon neutral and climate resilient future.”

Action GL 3.5 of the Galway LACAP positions itself in line with the GCDP and LARES and the climate action objectives of these plans.

- **Action GL 3.5:** *Advance the implementation of climate-related objectives in the County Development Plan and Local Authority Renewable Energy Strategy.*

In relation to renewable energy the Galway LACAP outlines the following policy action, which supports the research and development of renewable energy that is in line with environmental protection requirements:

- **Action EB 1.1:** *Support renewable energy research and development at the commercial and community scale whilst advocating and exerting influence to ensure such projects promote climate action co-benefits and do not contravene relevant environmental protection requirements.*

As outlined above, GCC are committed to climate action and climate mitigation through the implementation of the Galway LACAP. The Galway LACAP builds on the climate objectives set out in the GCDP and Local Authority Renewable Energy Strategy (LARES) and is supportive of national policies to reduce GHG emissions and reach carbon neutrality. The Proposed Project is capable of providing the national grid with clean, renewable energy, thus contributing to the decarbonisation of the electricity sector and as such, it is in alignment with the Galway LACAP.

2.5.4.3 Local Authority Renewable Energy Strategy

County Galway's Local Authority Renewable Energy Strategy (LARES) is included as Appendix 1 of the GCDP. 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 LARES *“encompasses the entire county of Galway and comprehensively considers the key sources of renewable energy in the county. The role of non-renewable energy, such as gas, is also incorporated into the LARES to facilitate the transition to a low carbon economy.”*

Key objectives in the LARES that are relevant to the Proposed Project, are identified in **Table 2-5** below:

Table 2-4: Relevant policy from the LARES in relation to the Proposed Project

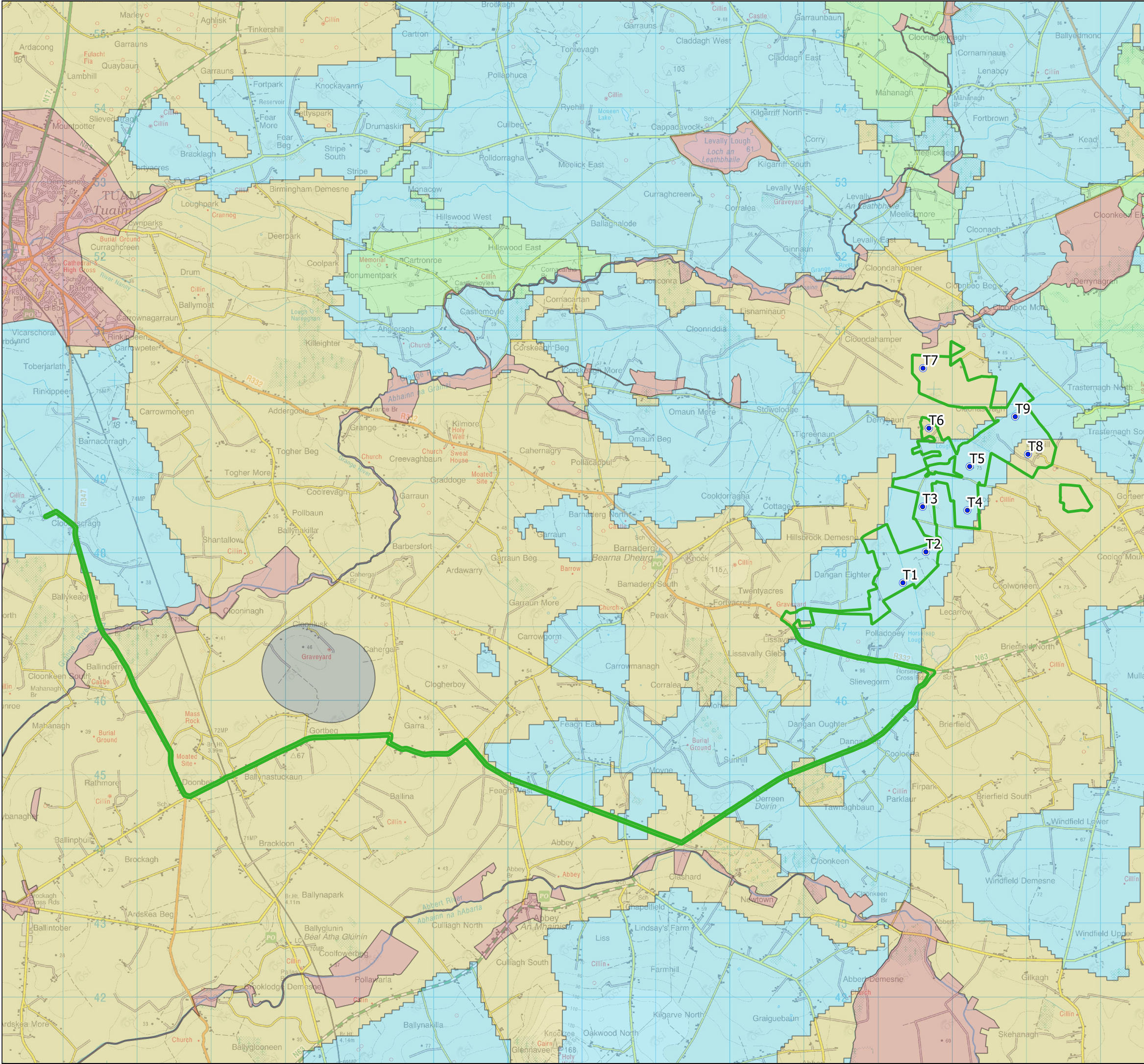
Policy	Description	Proposed Project Compliance
LARES Policy Objective 3: Renewable Energy Generation	<i>“To facilitate and support appropriate levels of renewable energy generation in County Galway, in light of the need to transition to a low carbon economy and to reduce dependency on fossil fuels.”</i>	The Proposed Project will facilitate the production of renewable energy and will contribute to meeting the country's binding targets in relation to renewable energy, helping the transition to a low carbon economy.
LARES Policy Objective 13: Wind Energy Generation	<i>“To increase renewable energy generation levels from wind energy developments in County Galway, given the recognised wind energy potential of the County.”</i>	The Proposed Project has the potential to generate upwards of 54MW of renewable energy which will be connected to the National grid and will contribute towards increased renewable energy generation from wind energy in County Galway.
LARES Policy Objective 14: National Wind Energy Guidelines	<i>“All onshore wind energy developments shall comply with the National Wind Energy Development Guidelines or any subsequent version thereof”</i>	The Proposed Project has been designed in accordance with all relevant planning policy requirements including the Guidelines and the draft Guidelines.
LARES Policy Objective 37: Indigenous Renewable Energy	<i>“To prioritise and actively encourage the generation of indigenous renewable energy in developments throughout County Galway. Proposals involving</i>	The Proposed Project will generate energy from a natural resource (wind) within the boundary of County Galway,

	<i>indigenous renewable energy as the primary source of energy will be considered favourably, in accordance with the LARES and the proper planning and sustainable development of the area.”</i>	facilitating the County’s aim of developing indigenous renewable energy supplies.
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A primary aim of the LARES is to set out one integrated, comprehensive suite of policy objectives for renewable energy development in Galway that seek to encourage wind energy developments at appropriate locations and to guide the location and design of new proposals. The LARES identifies areas within County Galway according to a hierarchy from the most optimal areas for wind down to areas not generally considered suitable. There are five categories relating to wind energy designations within the LARES, summarised as follows:

- **Strategic Areas** - Areas where existing wind developments are situated which have already been subjected to detailed legal and development management processes.
- **Acceptable in Principle** - Areas where Wind Energy development will be facilitated as an appropriate land use.
- **Open To Consideration** - Areas where Wind Energy development is likely to be favourably considered - subject to the results of more detailed assessment of policies and potential effects.
- **Generally to be Discouraged** - Areas where Wind Energy development is unlikely to be favourably considered on account of potential to adversely effect protected landscape, water, ecological resources and residential amenity.
- **Not Open to Consideration** - Areas where Wind Energy Projects, would be likely to conflict with policies of the council to protect landscape, water, ecological resources and residential amenity.

The Proposed Wind Farm site is located across two LARES classifications, “Open to Consideration” and “Generally to be Discouraged”. The classification is outlined in the LARES (Map 15) as below.



Map Legend

- EIAR Site Boundary
- Proposed Turbines

Galway Wind Energy Strategy

- Acceptable in Principle
- Generally to be Discouraged
- Not Normally Permissible
- Open to Consideration
- Strategic Area

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Drawing Title

Wind Energy Strategy

Project Title

Cooloo Wind Farm, Co. Galway

Drawn By	EC	Checked By	EMcC
Project No.	190723	Drawing No.	Figure 2-3
Scale	1:50,000	Date	2025-09-25

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Having regard to the above, the following section sets out a brief summary of how the Proposed Project is in compliance with the LARES. However, it should be noted that the accompanying Planning Report provides further and more detailed analysis on these matters. MAP 15 of the LARES was created by mapping individual factors. Each factor is assigned a 'priority' and identified as a 'opportunity' or 'sensitivity'. Figure 2-3 below has been extracted from the LARES and demonstrates the factors identified as sensitivities and opportunities within the LARES.

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 2-2-4 Factors Categorised as Opportunities or Sensitivities for Each Type of Renewable Energy (Extracted from the LARES)

The Proposed Wind Farm site was examined against the relevant factors as outlined in Figure 2-3 above. The examination of the Proposed Wind Farm site against these factors is outlined in Table 2-5 below.

Table -2-5 Opportunities and Sensitivities of the Proposed Wind Farm site

Opportunities		Sensitivities	
Energy Network (High priority)	Proximity to the Cloon 110kV Substation	Pop. Density (High priority)	>20 and <= 50 (Second lowest population category)
Road Network (High priority)	Within 3km of 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)	<=8 (m/s)	Flooding (Medium priority)	Does not overlap with fluvial & Coastal flood areas
		Landslide (High priority)	Low (inferred)

As set out in this EIAR and the accompanying Planning Report, the Proposed Wind Farm has been designed in accordance with the opportunities and sensitivities set out in the LARES and presents an appropriate and suitable opportunity for wind energy development. Having regard to the factors listed above, the Proposed Wind Farm is in close proximity to the existing energy transmission network and road network, is located on a suitable land use type and has suitable wind speeds. Furthermore, the Proposed Wind Farm has few sensitivities constraining wind energy development. Firstly, the Proposed Wind Farm site is not located within any of the 'excluded areas' (Sensitive landscapes, designated sites, geological heritage sites, settlements). The Proposed Wind Farm site is not prone to landslides or flooding and is not located within an ecologically protected area. The population density is between 20 and 50 persons per square kilometre which is the second lowest category on the population density map in the LARES. As such it is considered that the Proposed Wind Farm is in accordance with the aims and objectives of the LARES and represents an opportunity to increase the supply of renewable electricity to the national grid on a suitable site.

Please refer to the accompanying Planning Report which sets out in detail how the Proposed Wind Farm is consistent with the policies, objectives and development management standards of the LARES.

2.5.4.4 Compliance with Local Policy Objectives

In summary, the GCDP and associated LARES fully recognises the importance of tackling climate change through the increased supply of renewable energy. The LACAP outlines the County's commitment to climate action and the need to meet national objectives regarding a reduction in GHG emissions. GCC seeks to support and facilitate the sustainable provision of a reliable energy supply in the County, with emphasis on increasing energy supplies derived from renewable resources. Furthermore, there are a range of policies in place which support the development of renewable energy.

The layout of the Proposed Wind Farm has been strategically developed, with the Proposed Wind Farm being located on a site predominantly made up of 'Open to Consideration' areas within the LARES, demonstrating the site's appropriateness for wind energy development. Detailed site-specific surveys have resulted in the identification of an unconstrained viable area, in which all proposed turbines are located (See Chapter 3 Reasonable Alternatives for more detailed information). Accordingly, the Proposed Project is considered to be compliant with the relevant provisions of the GCDP and represents proper planning and sustainable development in the function area of GCC.

2.5.5 Other Relevant Onshore Wind Energy Planning Policy Publications

The following relevant onshore wind planning policy publications and/or best practice guidelines were considered in the design and assessment of the Proposed Project.

Wind Energy Development Guidelines 2006

In June 2006, the then Department of Environment, Heritage and Local Government (DoEHLG) published the Wind Energy Development Guidelines (Guidelines (DoEHLG, 2006)) under Section 28 of the Act. The aim of the Guidelines (DoEHLG, 2006) was to assist the proper planning of wind power projects in appropriate locations around Ireland. The Guidelines (DoEHLG, 2006) 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.

Each wind energy development has its own characteristics and defining features, and it is therefore impossible to write specifications for universal use. The Guidelines (DoEHLG, 2006) should be applied practically and do not replace existing national energy, environmental and planning policy. While the Guidelines (DoEHLG, 2006) remain the relevant guidelines in place, at the time of lodgement, decision makers (Planning Authorities and the Board) are not bound to their provisions, and they (and do) consider updated standards/requirements/specifications in assessing impacts and the proper planning and sustainable development of the area.

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 (DoHPLG, 2019) concluded on the 19th of February 2020. A further review of the Draft Guidelines (DoHPLG, 2019) 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 (DoHPLG, 2019), 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 (DoHPLG, 2019) 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.

The Draft Guidelines (DoHPLG, 2019) note that potential impacts of wind energy development proposals on the landscape, including the natural and built environment, must be considered along with the legitimate concerns of local communities. With this in mind, and in line with the previously stated “preferred draft approach”, the Draft Guidelines (DoHPLG, 2019) primarily focus on addressing a number of key aspects including, but not limited to:

- Acceptable noise thresholds and monitoring frameworks;
- Visual amenity setback;
- Control of shadow flicker;
- Compliance with Community consultation and dividend requirements, as included within the obligatory Community Report; and
- Consideration of the siting, route and design of the proposed grid connection as part of the whole project.

The design of the Proposed Project has taken account of the “preferred draft approach” as articulated by the Department in June 2017, and accordingly, has been developed with the provisions of the Draft Guidelines (DoHPLG, 2019) in mind (for example in relation to 4 times turbine tip height set back distance from third party sensitive receptors) and the inclusion of a standalone community report.

As stated above, the submission period for the Draft Guidelines (DoHPLG, 2019) closed in February 2020. Under the consultation, concerns were raised in relation to a number of themes including, but not limited to; noise, visual amenity, set back and shadow flicker. With regards to noise, a number of the received submissions noted that the provisions put forward in the Draft Guidelines (DoHPLG, 2019) were unworkable and could impact the viability of the entire onshore wind sector. In relation to set back distances there was strong criticism with regards to this distance being measured to the curtilage of a property due to this measurement being ambiguous and difficult to implement. Furthermore, questions were raised surrounding the strict measures proposed for shadow flicker; the Draft Guidelines

(DoHPLG, 2019) put forward the provision that *‘there will be no shadow flicker at any existing nearby dwelling or other relevant existing affected sensitive property’* which didn’t allow time for the safe shutting down of turbines.

At time of writing the Draft Guidelines (DoHPLG, 2019) are not yet finalised and have not been adopted. The relevant wind energy guidelines for the purposes of Section 28 of the Act, as amended, remain those published in 2006, the Guidelines (DoEHLG, 2006). Notwithstanding this, however, due to the timelines associated with the planning process for renewable energy projects it is possible that an updated version of the Draft Guidelines (DoHPLG, 2019) may be finalised during the consideration period for the current planning application for the Proposed Project. To this end, on the basis of the details available from the Draft Guidelines (DoHPLG, 2019) it is anticipated that the Proposed Project will be capable of adhering to the relevant noise and shadow flicker standards. While the final guidelines have not yet been published it should be noted that Shadow Flicker and Noise are entirely controllable and are discussed further in Chapter 5 and Chapter 12, respectively. In addition, the Proposed Project maintains a four times tip height set back between turbines and sensitive receptors which is currently the recognised standard for visual amenity purposes, as outlined in the Draft Guidelines (DoHPLG, 2019). Furthermore, comprehensive community consultation has also been undertaken (refer to **Appendix 2-1**) and detail of the Proposed Grid Connection for the Proposed Project has been provided and assessed as part of this EIAR, forming an integral part of this planning application

IWEA Best Practice Guidelines for the Irish Wind Energy Industry 2012

The Irish Wind Energy Association (IWEA) (now Wind Energy Ireland) published updated Wind Energy Best Practice Guidelines for the Irish Wind Industry in 2012 (hereafter referred to as the IWEA Guidelines). The IWEA Guidelines aim to encourage and define best practice development in the wind energy industry, acting as a reference document and guide to the main issues relating to wind energy developments. The purpose of the IWEA Guidelines is to encourage responsible and sensitive wind energy development, which takes into consideration the concerns of local communities, planners, and other interested groups. The IWEA Guidelines outline the main aspects of wind energy development with emphasis on responsible and sustainable design and environmental practices, on aspects of development which affect external stakeholders, and on good community engagement practices. In approaching the development of IWEA Guidelines the aim was to be complementary to the Guidelines (DoEHLG, 2006).

IWEA Best Practice Principles in Community Engagement and Community Commitment 2013

IWEA extended its guidance with the publication of the *‘Best Practice in Community Engagement and Commitment’*. IWEA and its members support the provision of financial contributions by wind farm operators to local communities and have sought to formulate best practice principles for the provision of a community commitment. The community engagement document sets out IWEA’s best practice principles for delivering extended benefits to local communities for wind farm developments of 5 Megawatts (MW) or above. Best practice principles of community engagement when planning the engagement strategy and preparing associated literature are also outlined in the document. The aim of this document and associated best practice principles is to ensure that the views of local communities are taken into account at all stages of a development and that local communities can share in the benefits.

DCCAE Code of Practice for Wind Energy Development Ireland – Guidelines for Community Engagement 2016

In December 2016, the (then) Department of Communications, Climate Action and Environment (DCCAE) issued a Code of Practice for wind energy development in relation to community engagement. The Code of Practice is intended to ensure that wind energy development in Ireland is

undertaken in adherence with the best industry practices, and with the full engagement of local communities. Community engagement is required through the different stages of a project, from the initial scoping, feasibility and concept stages, right through from construction to the operational phase. The methods of engagement should reflect the nature of the project and the potential level of impact that it could have on a community. The Code of Practice advises that ignoring or poorly managing community concerns can have long-term negative impacts on a community's economic, environmental or social situation. Not involving communities in the project development process has the potential to impose costly time and financial delays for projects or prevent the realisation of projects in their entirety.

Further details on the community engagement that has been undertaken as part of the Proposed Project are presented below. A Community Engagement Report has been prepared by MKO and is included as **Appendix 2-1** to this chapter. This report outlines the steps taken by the Applicant to communicate effectively with the local community in respect of the Proposed Project.

Department Circular PL5/2017

On the 3rd of August 2017, the (then) Department of Housing, Planning and Local Government (DHPLG) issued Circular PL5/2017 to provide an update on the review of the wind energy and renewable policies in development plans, and the advice contained within a previous Departmental Circular PL20-13. Circular PL20-13 advised that local authorities should defer amending their existing Development Plan policies in relation to wind energy and renewable energy generally as part of either the normal cyclical six-yearly review or plan variation processes and should instead operate their existing development plan policies and objectives until the completion of a focused review of the Guidelines (DoEHLG, 2006). The new circular (PL05/217) reconfirms that this continues to be the advice of the Department.

The Circular also set out the four key aspects of a preferred draft approach being developed to address the key aspects of the review of the Guidelines (DoEHLG, 2006) as follows:

- The application of a more stringent noise limit, consistent with World Health Organisation (WHO) noise standards, in tandem with a new robust noise monitoring regime, to ensure compliance with noise standards;
- A visual amenity setback of 4 times the turbine height between a wind turbine and the nearest residential property, subject to a mandatory minimum distance of 500 metres between a wind turbine and the nearest residential property;
- The elimination of shadow flicker; and
- The introduction of new obligations in relation to engagement with local communities by wind farm developers along with the provision of community benefit measures.

Commission for Regulation of Utilities: Grid Connection Policy

The Commission for Regulation of Utilities (CRU) (previously the Commission for Energy Regulation (CER)) launched a new grid connection policy in March 2018 for renewable and other generators, known as ECP-1, which seeks to allow “shovel ready” projects that already have a valid planning permission, connected to the electricity networks. The principal objective which guides this decision is to allow those projects to have an opportunity to connect to the network, along with laying the foundations for future, more regular batches for connection. August 2018 saw the applicants for new connection capacity under ECP-1 published. ECP-2 was launched in June of 2020, which set policy for at least three annual batches of connection offers (ECP 2.1, ECP-2.2, and ECP-2.3). On 4th April 2023 the CRU published its Decision on ECP-2.4, confirming a fourth batch under the ECP-2 policy. The first four ECP-2 application windows (2.1 -2.3 and -2.4) opened for the month of September each year. The application window for the fifth annual batch (ECP-2.5) closed on the 30th of November 2024. The enduring connection policy regime replaces the previous ‘Gate’ system of grid connection applications.

The grid connection application window under ECP-1 was the first time since 2007 that certain renewable energy projects including wind farms had an opportunity to secure a new grid connection offer.

The design of the Proposed Grid Connection has taken account of the “*preferred draft approach*” and accordingly, has been developed with the provisions of the Draft Guidelines (DoHPLG, 2019) in mind. This grid connection policy will allow for the Proposed Grid Connection, once it is permitted, to connect to the electricity networks under the enduring connection policy regime.

Renewable Energy Support Scheme

CAP25 is the Government’s plan to give Irish people a cleaner, safer and more sustainable future to halve emissions by 2030 and reach net zero no later than 2050. The Plan sets out actions across every sector which will ensure we meet our future climate commitments. A key part of the CAP25 is to increase the proportion of renewable electricity to up to 80% by 2030, with a target of 9GW from onshore wind. These measures will be driven by introduction of the Renewable Electricity Support Scheme (‘RESS’) which aims to promote the generation of electricity from renewable sources.

The RESS is an auction-based scheme which invites renewable electricity projects to bid for capacity and receive a guaranteed price for the electricity they generate.

RESS 1 was the first Renewable Electricity Support Scheme run by the Government of Ireland and concluded in 2020. RESS 2 was run in 2022 and concluded in June 2022. The successful projects in RESS 2 represent a potential increase of nearly 20% in Ireland’s current renewable energy generation capacity. They will be delivered between 2023 and 2025. A public consultation was opened in 2022 to refine the Terms and Conditions developed for RESS 2 with a limited and specific set of changes for RESS 3. This consultation closed in December 2022. RESS 3 was ran in 2023 and concluded in September 2023.

The RESS ensures that we are on a pathway to meet our ambitious climate targets and lays the foundations of a thriving and cost-effective renewable electricity market. This will support the growth of the green economy, create sustainable work opportunities, and ultimately benefit the consumer as renewables become more cost effective and increase Ireland’s energy security.

The Proposed Project is in accordance with the CAP25 and a grant of permission for the onshore wind energy development will allow for the Proposed Project to participate in the RESS auction and contribute renewable energy generation in achieving Irelands CAP25 target of 9GW of onshore wind generation by 2030.

2.6

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 Proposed Wind Farm site boundary.

Three applications were identified within Application Site. One extant planning application was identified (GCC PI 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 (GCC PI Ref: 071064) and one application for a dwelling house (GCC PI Ref: 061802).

2.6.1

Wind Energy Developments within 20km of the Proposed Turbines

A planning search was carried out to establish permitted, operational and proposed wind energy developments within 20km of the proposed turbines for the purposes of informing the potential cumulative effects (see Section 2.8.2 of this Chapter for further details). The search was carried out using the relevant local authority, ACP's and EIA planning portals in September 2025 for relevant planning applications.

In total, 6 no. applications relating to wind energy were identified within 20km of the proposed turbines, 3 no. of which relate to single turbine or domestic turbines, a further 3 no. of which relate to larger multiple turbine wind farm developments. 1 no. application is currently at pre-application stage with ACP. These are outlined in **Table 2-7** below:

Table 2-6 Valid Wind Farm Applications within 25km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	Turbine No.	Approx. Distance to Nearest Turbine
Single/Domestic Turbines								
Pl Ref. 13/1139	Clooncon East Single Turbine	Galway	Sean Molloy	To erect a single electricity generating wind turbine of hub height up to 60m and rotor diameter up to 48m, a hardstanding, control building, associated site roads, drainage and site works	Granted by GCC on 30/08/2021	Existing	1	15.3 km
Pl Ref. 22/1175	Cloonascragh Single Turbine	Galway	Sub. of Sharedturbine Ltd. Cloonascragh Locally Owned Turbine Limited	for the development consisting of a wind energy development comprising of one electricity generating wind turbine, with an overall blade tip height of up to 168m, construction of c. 150m of permanent access track, 110m of temporary access track, road widening works along the existing local access road from the R327 to the proposed site access track, a crane hardstand, a 20kV substation, site electrical & fibre optic cabling & ancillary site works. The maximum output capacity of the wind farm wil	Granted by GCC on 20/11/2023	Permitted	1	9.5 km
Pl Ref. 2374	Park Athenry Single Turbine	Galway	John Flaherty	to erect 20kw domestic wind turbine and associated site works.	Granted by GCC on 09/02/2024	Existing	1	17.8 km
Large Wind Energy Applications								

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	Turbine No.	Approx. Distance to Nearest Turbine
Pl Ref. 08/2407	Cloonlusk Wind Farm	Galway	Oliver Tierney	Construct 2 No. 2 megawatt wind turbines on 75m towers plus substation, access road and crane stand (gross floor space 31.7sqm)	Granted 20/11/09, EOD Granted 14/08/14	Existing	2	7 km
ACP Ref. PC07.307058	Clonberne Wind Farm	Galway	Clonberne Wind Farm Limited	Construction of a wind energy development.	With ACP for decision, FI issued	Proposed	11	4.7 km
ACP Ref. PA07.319307	Laurclavagh Wind Farm	Galway	Laurclavagh Limited	Renewable energy development including 8-9 wind turbines and associated infrastructure, with the potential to generate more than 50MW of electricity.	With ACP for decision, FI issued	Proposed	8	17.5 km
N/A	Gannow Wind Farm	Galway	Gannow Ltd	8 no. Turbine Wind Farm at Gannow and surrounding townlands, Co. Galway.	Pre-application	Proposed	8	18.8 km

2.7 Scoping and Consultations

2.7.1 Scoping

Scoping is the process of determining the content, depth and extent of topics to be covered in the environmental information to be submitted to a competent authority for projects that are subject to an Environmental Impact Assessment (EIA). This process is conducted by contacting relevant authorities and Non-Governmental Organisations (NGOs) with interest in the specific aspects of the environment with the potential to be affected by the proposal. These organisations are invited to submit comments on the scope of the EIAR and the specific standards of information they require. Comprehensive and timely scoping helps ensure that the EIAR refers to all relevant aspects of the Proposed Project and its potential effects on the environment and provides initial feedback in the early stages of the EIAR preparation, when alterations are still easily incorporated into the design. In this way scoping not only informs the content and scope of the EIAR, but it also provides a feedback mechanism for the proposal design itself.

As part of the constraints mapping process, which is detailed in Chapter 3 of this EIAR, telecommunications operators, were contacted in February 2024 in order to determine the presence of telecommunications links or aviation assets traversing or located in close proximity to the Proposed Wind Farm site. In addition to this exercise, an EIAR scoping document, providing details of the Proposed Project, was prepared by MKO and circulated in April 2023. The scoping document provided details of the Proposed Project and set out the scope of work for the EIAR. Consultees were invited to contribute to the EIAR by suggesting baseline data, survey techniques and potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR.

2.7.2 Scoping Responses

The bodies engaged with at scoping stage are set out below in **Table 2-8 and Table 2-9**. Further to this, responses received from the scoping document circulated are set out in **Table 2-10** below. Copies of all scoping responses received are included in **Appendix 2-2** of this EIAR. If further responses are received, the comments of the consultees will be considered, where applicable, in the construction, operation and decommissioning of the Proposed Project in the event of a grant of planning permission. The recommendations of the consultees have informed the scope of the assessments undertaken and the contents of the EIAR.

Table 2-7 Scoping List and Responses

Ref	Consultee	Date of Response
1	An Taisce	8th May 2023
2	Bat Conservation Ireland	19th April 2023
3	Bird Watch Ireland	No Response
4	Broadcasting Authority Ireland	1st Aug 2025
5	Commission for Regulation for Utilities, Water and Energy	No Response
6	Department for Agriculture, Food and the Marine	2nd May 2023
7	Department for Defence	5th May 2023
8	Department of Environment, Climate and Communications	8th May 2023
9	Department of Tourism, Culture, Arts, Gaeltacht, Sport, and Media	No Response
10	Department of Transport	11th May 2023

11	EirGrid	No Response
12	ESB Networks	28th Aug 2025
13	Failte Ireland	20th Aug 2025
14	Forest Service	10th May 2023
15	Galway Airport	No Response
16	Galway County Council – Environment Department	No Response
17	Galway County Council – Heritage Officer	No Response
18	Galway County Council – Roads Department	No Response
19	Galway County Council- Planning Department	No Response
20	Geological Survey of Ireland	12th Aug 2025
21	Health Service Executive	28th Aug 2025
22	Iarnród Éireann	18th May 2023
23	Inland Fisheries Ireland	No Response
24	Ireland West Airport (Knock)	No Response
25	Irish Aviation Authority	31st Jul 2025
26	Irish Peatland Conservation Council	No Response
27	Irish Raptor Study Group	No Response
28	Irish Red Grouse Association	No Response
29	Irish Sport Council	No Response
30	Irish Water/ Uisce Eireann	5th Sept 2025
31	Irish Wildlife Trust	18th Apr 2023
32	Lawpro	11th May 2023
33	National Parks and Wildlife Service	29th May 2023
34	Northern & Western Regional Assembly	18th May 2023
35	Office of Public Works	2nd Jun 2023
36	Sustainable Energy Authority of Ireland	No Response
37	The Heritage Council	No Response
38	Transport Infrastructure Ireland	6th Aug 2025
39	Waterways Ireland	No Response
40	Western RBD Project Office	No Response

Table 2-9 sets out the detail of Telecommunication consultation responses received. The responses received were fully considered and issues raised where followed up through contact with the respondent where clarification was necessary and addressed throughout the EIAR.

Table 2-8 Telecommunications Scoping And Responses

Ref	Consultee	Date of Response
1	AI Bridges	No Response*
2	Airspeed Communications Ltd.	No Response
3	An Garda Síochána (Telecoms)	No Response

4	Broadcasting Authority Ireland	1st Aug 2025
5	Commission for Communications Regulation	16th Feb 2024
6	Eir	No Response
7	EirGrid	No Response
8	EMR Integrated Solutions	No Response
9	Enet	16th Apr 2024
10	ESB Telecoms	28th Aug 2025
11	Imagine Group Communications	No Response
12	Lighthouse Networks Limited	2nd Feb 2021
13	Motorola	31 st Jul 2025
14	Ripple Communication Ltd.	No Response
15	RTE Transmission Network (2m)	6th Aug 2025
16	TETRA Ireland Communications Ltd.	24th Apr 2023
17	TG4	No Response
18	Three Ireland Ltd.	11th Aug 2025
19	Towercom	20th Jun 2023
20	Viatel Ireland Ltd.	31st Jul 2025
21	Virgin Media Ltd (previously UPC)	16th Feb 2024
22	Vodafone Ireland Ltd.	31st Jul 2025

Table 2-10 below provides a brief summary of the details received from some of the above consultees. The table also identifies the relevant chapter where the points raised by each of the consultees are addressed.

Table 2-9 Consultee responses and relevant chapters

Consultee	Points raised by consultee	Addressed in Chapter
Department for Defence	Having consulted with the subject matter experts in the Irish Air Corps, the Department of Defence wishes to make the following observations: - All turbines should be illuminated by Type C, Medium intensity, Fixed Red obstacle lighting with a minimum output of 2,000 candela to be visible in all directions of azimuth and to be operational H24/7 days a week. - Obstacle lighting should be incandescent. If LED or other lighting types are used, should be a type visible to Night Vision equipment. Obstacle lighting must emit light at the near Infra-Red (IR) range of the electromagnetic spectrum, specifically at or near 850 nanometres (nm) of wavelength. - Light intensity to be of similar value to that emitted in the visible spectrum of light.	Chapter 15 Material Assets
Department of Transport	The proposed development, especially the connection cables to national grid will have effects on both the environment and the Regional and local road network. Examining mitigating disruptions to local and national road networks. Ensure when applying conditions to any approval that local authorities are informed of the route chosen for cables in public road spaces, developer must comply with standards. Avoid bridge structures and notify road authorities of cables owners/ providers.	Chapter 15 Material Assets Appendix 15-2 Traffic Management Plan
Faile Ireland	"Attached a copy of Fáilte Ireland's Guidelines for the Treatment of Tourism in an EIA, which you may find informative for the preparation of the Environmental Impact Assessment for the proposed project. The purpose of this report is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2."	Chapter 5 Population and Human Health
Forest Service	If there's any felling involved, a Felling Licence must be obtained before trees are felled or removed. Felling and Reforestation document needs to be consulted before any felling is undertaken.	Chapter 6 Biodiversity

Geological Survey of Ireland	Received pdf reply with "Cooloo-Clonberne" ref notes include: Geoheritage: Our records show that there is a CGS adjacent to the proposed wind farm development study area. Derrynagran Bog and Esker Groundwater: Karst Viewer indicates there are numerous karst landforms including enclosed depressions within the proposed wind farm development study area. Groundwater Data Viewer indicates an aquifer classed as a 'Regionally Important Aquifer - Karstified (conduit)' underlies the proposed wind farm development study area. groundwater drinking water abstraction: Mid-Galway Public Water Supply Scheme (PWS), with a source protection area within the proposed wind farm development study area. Other Comments: Should development go ahead, all other factors considered, Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out.	Chapter 8 Geology and Soils Chapter 9 Hydrology & hydrogeology
Health Service Executive	Scoping response provided was organised under the following headers: - Public Consultation - Decommissioning - Siting, Location & details of Turbines/Energy Storage Batteries - Assessment of Consideration of Alternatives - Noise and Vibration - Shadow Flicker - Air Quality - Surface and Ground Water Quality - Geotechnical and Peat Stability Assessment - Ancillary Facilities - Cumulative Impacts Full descriptions of points raised by Health Service Executive can be found in Appendix 2-1 Scoping Responses.	Chapter 1 Introduction Chapter 2 Background Chapter 3 Reasonable Alternatives Chapter 4 Description Chapter 5 Population and Human Health Chapter 8 Geology and Soils Chapter 9 Hydrology & hydrogeology Chapter 10 Air Quality Chapter 12 Noise and Vibration Appendix 2-2 Community Engagement Report Appendix 4-3 Construction and Environmental Management Plan

		Appendix 4-8 Decommissioning Plan
Irish Aviation Authority	Based on the preliminary information provided, should a formal planning application be submitted, the Irish Aviation Authority will likely offer the following general observations: "In the event of planning consent being granted, the applicant should be conditioned to contact the Irish Aviation Authority to: (1) agree an aeronautical obstacle warning light scheme for the wind turbine development, (2) provide as-constructed coordinates in WGS84 format together with ground and tip height elevations at each wind turbine location and (3) notify the Authority of intention to commence crane operations with at least 30 days prior notification of their erection." Following the separation of the Irish Aviation Authority and Air Navigation Ireland (the IAA ANSP) from the 30th April 2023, Air Navigation Ireland has responsibility for the maintenance and safeguarding of en route communications and navigation surveillance equipment in Ireland. Please forward the report for their review to: planning@airnav.ie	Chapter 15 Material Assets
Irish Water/ Uisce Éireann	Uisce Éireann (UÉ) has reviewed the indicative plan submitted and have the following observation(s). Proximity to Uisce Éireann Assets The proposed works are within the Zone of Contribution of an Uisce Eireann public drinking water supply – the Mid Galway water supply zone. Protection of drinking water source(s) from potentially adverse impacts is a priority for Uisce Éireann. It is Uisce Éireann's current policy to maintain safe and secure drinking water supplies and ensure that development will not give rise to any deterioration in water quality. Development proposals shall not impact public drinking water sources and/or abstraction point(s). It is also a requirement of the Water Framework Directive that waters used for the abstraction of drinking water are protected to avoid deterioration in quality. Development proposals shall not impact public drinking water sources and/or abstraction point(s) The EIAR must identify, assess and mitigate the risks of the proposed development on the public drinking supply. Details of measures to be taken to ensure that there will be no negative impact to Uisce Éireann's Drinking Water Source(s) during the construction and operational phases of the development must be outlined. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified as part of an EIAR and/or the planning application. The EIAR should be submitted to Uisce Éireann for review and comment prior to the lodgement of any planning application.	Chapter 9 Hydrology & hydrogeology Appendix 4-4 Construction and Environmental Management Plan Appendix 4-5 Surface Water Management Plan

National Parks and Wildlife Service	Nature Conservation Recommendations Bird Surveys: ➤ Year-round, minimum two-year surveys needed for all bird species. ➤ Include collision risk, habitat loss, barrier effects, and migration routes (day/night). ➤ Use vantage point surveys + technological solutions to ensure sufficient data. ➤ Consider cumulative impacts from nearby wind farms and importance of improved agricultural land for wintering wildfowl. Bat Surveys: ➤ Assess potential impacts on bats (protected under law). ➤ Follow latest guidance (2019 report) using 30-day seasonal surveys with detectors at multiple heights. ➤ Avoid disturbing roosts unless derogation licence obtained. Wetlands & Watercourses: ➤ Detailed hydrological impact assessment required, including impacts on Lough Corrib SAC and other Natura 2000 sites. ➤ Maintain 10m riparian buffer zones for otters and consider their movements. ➤ Survey for protected species (e.g., otter, salmon, lamprey, crayfish, kingfisher). Floodplains & Peatlands: ➤ Identify and avoid developing on floodplains. ➤ Assess peat stability and potential habitat loss due to peatland disturbance. Other Ecological Considerations: ➤ Marsh Fritillary butterfly surveys required where food plants are present. ➤ Maintain hedgerows and scrub where possible; avoid removal during nesting season.	Chapter 6 Biodiversity Chapter 7 Ornithology Chapter 8 Geology and Soils Chapter 9 Hydrology & hydrogeology Chapter 13 Landscape Chapter 14 Cultural Heritage
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	➤ Address invasive species management (e.g., Rhododendron, Japanese Knotweed). ➤ Ensure cable route and turbine dimensions are flexible in EIAR if not finalized. ➤ Assess cumulative/in-combination impacts. ➤ Construction Management Plans (CMPs) must be detailed, feasible, and supported by evidence. ➤ Consider opportunities for ecological enhancement via a Habitat Management Plan (HMP). ➤ EIAR should show how the project avoids net biodiversity loss in line with the National Biodiversity Action Plan. Archaeological Recommendations The site lies within a wider area of known archaeological activity. A full Archaeological, Architectural & Cultural Heritage Impact Assessment (AACHIA) will be carried out (desktop + field inspection). Recommendations: ➤ Visual Impact Assessment to evaluate effects on monument settings. ➤ Desk study should inform geophysical survey and targeted test excavations. ➤ Archaeological monitoring required for any intrusive investigations. ➤ Buffers should be determined site-specifically (50m may not always be enough). ➤ Assessment should include potential impacts from construction activities (e.g., stockpiling, quarrying).	
Office of Public Works	The Proposed Project has the potential to have detrimental effects on OPW maintenance activities on a number of Arterial Drainage Maintenance channels in the area.	Chapter 9 Hydrology & hydrogeology Chapter 15 Material assets
Three Ireland Ltd.	Have a link through site. Request 50m setback	Chapter 15 Material assets

Transport Infrastructure Ireland	Developer should consult with LA, consider and assess visual impacts from existing national roads, other EIARs and EISs of projects in the area, have regard to TII guidelines. Consent and licences may be required from Roads Authority for trenching / cabling. Cabling should avoid all impacts to existing TII Infrastructure	Chapter 13 Landscape Chapter 15 Material Assets
Lawpro	Present of WFD Monitoring Station downstream of the Scheme near Abbeyknockmoy. The PD is also contained within a Prioritised Area for Action 'Coolourty Brierfield GWS' under the 2022-2027 dRBMP, therefore LAWPRO is focusing on this area to protect water quality.	Chapter 9 Hydrology & Hydrogeology

2.8 Other Consultations

2.8.1 Pre-Planning Meetings

2.8.1.1 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 Wind Farm 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:

- Ronan Dunne (MKO)
- Hannah Rice (MKO)
- Eoin McCarthy (MKO)
- Brandon Taylor (MKO)
- Evan Connolly (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 Board 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 the 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.

2.8.1.2 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.

- Set 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

2.8.2 Community Consultation

The Community Liaison Strategy for the Proposed Project was based around engaging with the local community in an open, honest and transparent manner with the aim to not only provide clear and understandable information but also to gain feedback to understand the views of the local community. This feedback and information was used to inform the design process. The community consultation effort was led by Neoen.

To inform local residents about the Proposed Project, a project Community Liaison Officer (CLO) was appointed and an introductory information leaflet was delivered via door-door consultation to all householders within a c.1km radius of the site, in September 2025, and a further leaflet drop to all households within c. 2km radius. All the information sent to the local community was also made available for public viewing on the project information website. The information leaflet distributed to each household consisted of the following:

- A company brochure, which provided an overview on Neoen and some general information about wind energy;
- A site location map;
- A map highlighting the potential developable area which was under review at that time;
- Dedicated contact details (name, phone and email) for the CLO in relation to the project, along with a web address for the dedicated project website.

Following the initial notification of the proposal to the local community, the CLO liaised with interested parties in helping them to understand the proposal and respond to any queries or concerns raised. As more project information became available, further consultations were organised, with the CLO attending in-person meetings with individuals to answer queries relating to the Proposed Project.

On 31st of January 2024 a public information event was held in the Barnaderg Community Centre, Co. Galway, the closest town to the Proposed Wind Farm site. The objective of the consultation was to ensure that the views and concerns of all were considered as part of the Proposed Project Design and EIA process. Appendix 2-2 of this EIAR contains a full and detailed Community Engagement Report. The report was prepared to record the consultation carried out with local community in respect of the Proposed Project.

Active engagement and consultation with the local community have taken place from an early stage during the pre-application phase of the Proposed Project. The consultation process has been an extremely valuable exercise and has provided a detailed, and enhanced understanding of the key issues and concerns of the local community, which have ultimately shaped the final project proposal. Due to the time passing between previous consultations and the time of submission, updated information was issued via post to the wider community in September 2025. The details included the full description of

the Proposed Project, as well as a map of the final layout of the Proposed Wind Farm. It is the intention of the applicant to continue with the consultation for the entire lifespan of the Proposed Project.

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

Please refer to the Community Engagement Report at **Appendix 2-1** of the EIAR for further details.

2.9

Cumulative Impact Assessment

The EIA Directive and associated guidance documents state that as well as considering any direct, indirect, secondary, transboundary, short, medium-, and long term, permanent and temporary, positive and negative effects of the project the description of likely significant effects should include an assessment of cumulative impacts that may arise. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to a proposed development or project. The factors to be considered in relation to cumulative effects include population and human health, biodiversity, land, soil, water, air quality, climate, material assets, landscape, cultural heritage, and major accidents / vulnerability to natural disasters, as well as the interactions between these factors.

To gather a comprehensive view of cumulative impacts on these environmental considerations and to inform the EIAR process being undertaken by the consenting authority, each relevant chapter within this EIAR includes a cumulative impact assessment where appropriate.

The potential for cumulative impacts arising from other projects has therefore been fully considered within this EIAR.

2.9.1

Methodology for the Cumulative Assessment of Projects

The potential cumulative impact of the Proposed Project and combined with the potential impact of other projects has been carried out with the purpose of identifying what influence the Proposed Project will have on the surrounding environment when considered collectively with approved and existing projects and projects pending a decision from the planning authority and land-uses in the defined cumulative assessment study areas as set out in **Table 2-11** below.

The cumulative impact assessment of projects has three principle aims:

- 1. To establish the range and nature of existing and approved projects within the cumulative impact study area of the Proposed Project.*
- 2. To summarise the relevant projects which have a potential to create cumulative impacts.*
- 3. To identify the projects that hold the potential for cumulative interaction within the context of the Proposed Project and discard projects that will neither directly nor indirectly contribute to cumulative impacts. (Note: this is done by individual competent experts with respect to their specialist area of expertise.)*

Projects were identified through a search of relevant online planning registers and effects were considered following a review of associated EIARs.

2.9.2

Cumulative Study Area

Table 2-11 below details the cumulative assessment study areas, relative to the Proposed Project, which are considered in this EIAR. Following consultation with the EIAR team on each individual topic, the maximum geographical extent where there is potential for in combination effects/cumulative impact, and justification for this extent was established and is presented below.

Table 2-10: Cumulative Study Areas and Justifications

Individual Topic	Maximum Extent	Justification
Population & Human Health (including shadow flicker)	Shadow Flicker Study Area (10x RD buffer from proposed turbines). Electoral Divisions where the Site is located (Cooloo, Hillsbrook, Moyne). Consideration for the Population & Human Health cumulative extent is also given to the Air Quality, Climate, Noise, Water and Landscape & Visual (i.e. Residential Visual Amenities) cumulative study areas.	The Population Study Area for Population is identified in Section 5.3.1 in Chapter 5 as the District Electoral Divisions where the Proposed Wind Farm site is located. For the Proposed Grid Connection, the Population Study Area for Population is identified as 100m from the proposed underground electrical cabling route. Both the Proposed Wind Farm site and Proposed Grid Connection Population Study Areas identified are considered for cumulative effects on Population. For the assessment of cumulative shadow flicker, any other existing, permitted or proposed wind farms are considered where their ten times rotor diameter shadow flicker study area are located within the Shadow Flicker Study Area of max 1.62km (ten times the rotor diameter from proposed turbines) for the Proposed Wind Farm. As the nearest proposed, permitted or existing wind farm is further than 1.62km from the proposed turbines at their closest points and has no overlapping shadow flicker study areas, no potential for cumulative shadow flicker impacts will arise.
Biodiversity – Flora and Fauna	10km from Proposed Wind Farm site 200m from the grid underground electrical cabling route. Consideration for the Biodiversity cumulative extent is also given to the Birds and Water Cumulative geographical boundaries.	Using the precautionary approach and given the nature and scale of the Proposed Project, the geographical boundary for terrestrial ecological aspects, i.e. habitats, is 10 km for cumulative assessment for the Proposed Wind Farm and 200 m from the Proposed Grid Connection.
Biodiversity – Bats	10km from proposed turbines.	A 10km buffer of the proposed turbines is used as is recommended for the desktop

Individual Topic	Maximum Extent	Justification
		study and cumulative assessment by NatureScot Guidelines 2021.
Birds	25km buffer from proposed turbines for large infrastructural development, such as wind farms.	NatureScot guidance ' <i>Assessing the Cumulative Impacts of onshore Wind Energy Developments</i> ' (SNH, 2012; 2018) was consulted while undertaking the cumulative assessment. SNH (2012; 2018) emphasises that its priority is to ' <i>maintain the conservation status of the species population at the national level.</i> ' However, it is acknowledged that consideration should also be allowed for impacts at the regional level ' <i>where regional impacts have national implications (for example where a specific region holds the majority of the national population)</i> '. Following the guidance of SNH (2012), the cumulative impact assessment has been carried out at the scale of the importance rating of the receptor. A 25km radius of the Proposed Wind Farm site turbines was considered a reasonable approximation of the size of a county and a 5km radius of the Proposed Wind Farm site turbines was considered a reasonable approximation for the local level.
Water	Clare River Catchment Sub Basins of Grange River and Abbert River	Regional surface water catchments are used for cumulative impact assessment with regard large infrastructural developments such as wind farms, energy and public transport developments. The potential for cumulative effects for these developments likely exists on a regional catchment scale (i.e. significant works likely existing in several sub-basins). Therefore, other wind-farm developments are considered within the Clare River Catchment for cumulative effects. River Sub Basins are used for smaller developments (i.e. private & commercial type developments). These developments are not likely to present a significant cumulative impact risk on a regional catchment scale as any effects would likely be imperceptible as a result of the setback distances and localised nature of the associated works. Given the nature and scale of the proposed works and the lack of hydrological cumulative impact potential beyond the river sub basin scale, the Water cumulative study area is defined

Individual Topic	Maximum Extent	Justification
		by river sub basins in which the Proposed Wind Farm is located.
Land, Soils and Geology	EIAR Site Boundary	As there is no pathway for offsite cumulative impacts for Land, Soils and Geology, the cumulative study area is the EIAR Site Boundary.
Air & Climate	Air Quality Study Area is 1km from Proposed Wind Farm. 200m from Proposed Grid Connection.	Given dust particles do not generally travel greater than 500m from source (<i>Guidance on the Assessment of Mineral Dust Impacts for Planning</i> , IAQM 2016) the geographical boundary for the cumulative dust impact is 500m. In line with the TII Publication Air Quality Assessment of Proposed National Roads – Standard PE-ENV-01107, December 2022, a geographical boundary of 1km was used for cumulative air quality assessment. The Climate assessment has considered the cumulative effects of the Proposed Developments with other developments on a national basis and within the context of the national Carbon Budget and relevant sectoral emissions ceiling.
Noise & Vibration	The list of wind farms which were initially considered in cumulative assessment extended to 10 km. 200m from Grid Connection underground electrical cabling route.	The geographical boundary for the cumulative noise assessment is the area within which noise levels from the proposed, consented and existing wind turbine(s) may exceed 35 dB LA90 at up to 10m/s wind speed (Institute of Acoustics document <i>Good Practice Guide To The Application Of Etsu-R-97 For The Assessment and Rating of Wind Turbine Noise</i>).
Cultural Heritage	10km from the Proposed Wind Farm Site for permitted and proposed developments. 20km for proposed or permitted wind energy developments.	Cumulative impacts on setting are more likely to occur at the operational stage of the development (i.e. post-construction). In this regard in order to assess overall cumulative effects on archaeology and cultural heritage the Proposed Project is considered in the context of other developments within 10km, and other permitted and proposed wind farms within 20km of the Site.
Landscape & Visual	20km from Proposed Wind Farm turbine locations for visual and landscape effects.	The LVIA Study Area was chosen as 20 kilometres for landscape and visual effects as is suggested by guidance: <i>For blade tips in excess of 100m, a Zone of Theoretical Visibility radius of 20km would</i>

Individual Topic	Maximum Extent	Justification
	15km from Proposed Wind Farm turbine locations for effects on landscape character.	be adequate' (WEDGs Page 94, DoEHLG, 2006; Page 152, DoHPLG, 2019) Through experience conducting LVIA for other wind energy development projects, the assessment team determined that no significant effects on landscape character are likely to arise beyond distances of 15km from the proposed turbines. Therefore, a LVIA Study Area of 15km is deemed appropriate for effects on landscape character in relation to the assessment of effects upon designated Landscape Character Areas.
Material Assets: Traffic & Transport	25km buffer from proposed turbines for large infrastructural developments such as wind farms, energy and public transport developments. Following that, the proposed transport route for each project is considered.	Informed by traffic modelling scenario and the area of influence the Proposed Project has on changing traffic volumes. The potential cumulative traffic effects with the Proposed Project are assessed on the following criteria; ➤ Project status (proposed to operational) ➤ Degree of overlap with the Proposed Project delivery highway network (low to high) ➤ Traffic volumes (low to high) The geographical boundary for the traffic and transport cumulative assessment is defined by the potential for other projects to overlap with the Proposed Project delivery highway network, and so a 25km buffer from turbines is deemed appropriate to capture other plans and projects with the potential for cumulative effects with the Proposed Project. Please refer to Chapter 15 Material Assets for further details on the cumulative assessment methodology.
Material Assets: Telecoms, Aviation and Other Utilities	The list of wind farms and other projects which were initially considered in cumulative assessment extended to 25 km. 200m from the grid underground electrical cabling route.	The geographical boundary for the telecoms cumulative assessment is defined by the potential for other wind farm projects to interfere with broadcast signals that interact with the Proposed Project.

To gather a comprehensive view of cumulative impacts within the cumulative study area and to inform the EIA process being undertaken by the consenting authority, each relevant chapter within the EIAR addresses the potential for cumulative effects where appropriate and within the context of their identified cumulative study area. A long list of projects considered (i.e. the largest cumulative study

boundary of 25km list) across all disciplines in their cumulative impact assessment is included in **Appendix 2-3**.

2.9.2.1 Other Developments/Land Uses

The review of the relevant planning registers documented relevant general development planning applications in the vicinity of the Site, the majority of which relate to the provision and/or alteration of one-off rural housing and the provision and/or alteration of agricultural buildings. These applications and land uses have also been taken account in describing the baseline environment and in the relevant assessments.

Furthermore, the cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider all potential significant cumulative effects arising from all land uses in the vicinity of the Proposed Project. These include permitted and existing wind farms in the area, solar farms, energy storage, ongoing agricultural practices/forestry practices, quarries and extractive industries, intensive production/ processing industries, large infrastructure projects and other EIAR projects. The OPW (www.floodinfo.ie) records the presence of an Arterial Drainage Scheme within the Site, the Corrib-Clare Scheme.

2.9.2.2 Forestry Felling and Replanting

The Proposed Wind Farm comprises coniferous forestry and agricultural land. This land-use will continue in conjunction with the operation and decommissioning of the Proposed Project. The potential for cumulative effects during the construction, operational and decommissioning phases of the Proposed Project have therefore been assessed.

Forestry Felling associated with Proposed Project

The Forest Service is responsible for ensuring the development of Forestry within Ireland occurs in a manner and to a scale that maximises its contribution to national socio-economic well-being on a sustainable basis that is compatible with the protection of the environment. The forestry felling associated with the Proposed Project will be carried out under the relevant guidance and under licence from the Forest Service and full details are set out in Section 4.3.1.7 of Chapter 4 of the EIAR. In line with the Forest Service's published policy on granting felling licences for wind farm developments, areas cleared of forestry for turbine bases, access roads, and any other wind farm-related uses will have to be replaced by replanting at an alternative site or sites. The Forest Service policy requires replacement or replanting on a hectare for hectare basis for the footprint of the turbines and the other infrastructure.

Replacement of Forestry

The replacement of forestry, felled as part of the Proposed Project, may occur on any lands, within the state, benefitting from Forest Service Technical Approval¹ for afforestation, should the Proposed Project receive planning permission. Under the Forestry Regulations 2017, all applications for licences for afforestation require the prior written approval (technical approval) of the Minister for Agriculture, Food and the Marine.

The requirements for afforestation licencing are set out in the Forestry Regulations 2017 – this includes consideration of Environmental Impact Assessment and Appropriate Assessment as set out in parts 7 and 8 of the Regulations, respectively. Further detail is set out in the Environmental Requirements for Afforestation (DAFM, 2016)²². This ensures that afforestation takes place in a way that complies with environmental legislation and enhances the contribution new woodlands and forests can make to the

²² <https://www.gov.ie/en/publication/642e6-forestry/#environmental-requirements>

environment and to the provision of ecosystem services, such as water protection and landscape enhancement.

The typical environmental effects of afforestation include potential effects on biodiversity, soils and geology, hydrology and hydrogeology, cultural heritage, landscape and visual, and air and climate.

The applicant is seeking a ten-year planning permission which incorporates time to secure a grid connection agreement, a route to market (RESS or equivalent Power Purchase Agreement), select the preferred equipment suppliers and put the necessary capital funding in place to allow construction and delivery to commence. Thus, the identification of forestry replacement lands at this stage is seen as premature. If a licence for afforestation was obtained prior to seeking and/or obtaining planning permission, it is highly likely that any licencing approvals sought from the Forest Service would have expired before it could be taken up due to the time required for the planning processes and post-planning delivery preparations. The Forest Service Afforestation Licences expire after 3 years from when they are consented.

Furthermore, as mentioned above, the key environmental issues relating to afforestation include water, biodiversity, archaeology, and landscape. Each is subject to regular updates in terms of best practice, guidelines, standards and national policies. Delaying the identification of alternative afforestation lands until such time as they are required enables identification of optimum lands available (from an environmental perspective) for afforestation at that time.

For the purposes of this project, the Applicant commits that the location of any replanting (alternative afforestation) associated with the project will be outside the identified cumulative study areas. On this basis, it is reasonable to conclude that there will be no more than imperceptible in-combination cumulative effects associated with the replanting. Therefore, forestry replanting is not considered further in the impact assessment chapters of the EIAR.

In addition, the Applicant commits to not commencing the project until both a felling and afforestation licence(s) is in place and, therefore, this ensures the afforested lands are identified, assessed and licenced appropriately by the relevant consenting authority.

Further details in relation to the consideration forestry replanting is included in Section 4.3.1.6 of Chapter 4 of the EIAR.

2.9.2.3 Summary

The cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider all potential significant cumulative effects arising from relevant projects and land uses within the cumulative study area. These include ongoing agricultural and forestry practices.

Overall, the Proposed Project has been designed to avoid and mitigate impacts on the environment and a suite of mitigation measures is set out within the EIAR. The mitigation measures set out in this EIAR will ensure that significant cumulative effects do not arise during the construction, operational or decommissioning phases of the Proposed Project. Additional detail in relation to the potential significant cumulative effects arising and, where appropriate, the specific suite of relevant mitigation measures proposed are set out within each of the relevant chapters of this EIAR.