## 4 PLANNING POLICY

#### 4.1. INTRODUCTION

This Chapter provides an overview of relevant international, national, and regional legislation and policy, along with a detailed review of the planning policy framework. It includes statistics on Irish renewable energy production, climate emissions, and the benefits of the Proposed Development for meeting Ireland's renewable energy targets. The Tirawley Wind Farm is anticipated to significantly contribute to Ireland's renewable energy targets with a generating capacity of 77.40 MW, benefiting both the region and the state economically and socially.

The urgency to combat climate change and meet energy demands is evident in reviewed policies, emphasizing the vital role of renewable energy in transitioning to a low carbon economy. Investing in renewable energy promotes sustainable economic development using secure and clean energy sources.

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

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

## In summary the Proposed Development would:

- Contribute to the 45 % overall renewable energy target for the EU introduced by the REPowerEU Plan considering the war in Ukraine.
- Contribute to assisting Ireland to increase from 42 % electricity produced by renewable sources in 2020 to 80 % by 2030 to meet the national target.
- Contribute towards the National Development Plan 2021-2030's National Strategic Outcome number 13 to diversify away from fossil fuels to green energy which includes wind.
- Contributes towards climate change mitigation as specified in the National Planning Framework's National Policy Objective 54.

 Contribute toward renewable energy use and generation as specified in the National Planning Framework's National Policy Objective 55.

- Contribute an anticipated 77.40 MW of renewable wind energy to the national CAP 2024 target of 9 GW by 2030 helping to reduce the current 4.2 GW shortfall.
- Comply with the Regional Spatial and Economic Strategy for the North and Western Region's Goals of producing renewable energy to tackle climate change, meet predicted growth in demand and provide energy security.
- Support the local Mayo County Development Plan policy on promoting appropriate renewable energy development and assist the county in achieving its goal of being the national leader in renewable energy generation to facilitate a low carbon future.
- Contribute an anticipated c. 77.40 MW of renewable wind energy to the Mayo County Development Plan target.
- Contribute to rural economic development in line with the Mayo County Development Plans and of the RSES.

## 4.1.1 Statement of Authority

Jennings O'Donovan & Partners Ltd. (JOD) have extensive experience in all aspects of wind farm development, from design and planning stages through to construction. JOD have been active as engineering consultants in the wind energy market in Ireland since 1998 and have completed numerous wind farm projects, varying from single wind turbine installations to large-scale, multi-turbine developments with a total of over 2,000 MW generation capacity.

This section has been prepared by Mr. Darren Timlin of JOD.

Mr. Darren Timlin is a Graduate Environmental Scientist and holds a Bachelor (Hons.) Degree in Environmental Science from the Atlantic Technological University. Darren has 3 years' experience drafting EIAR's and Screening Reports, Appropriate Assessments for Wind Farms, Hydrogen Plants and Power Generation Plants. He forms part of the Environmental team responsible for preparing the EIAR Chapters. Darren has experience drafting EIAR's and Screening Reports, Appropriate Assessments for Wind Farms, Hydrogen Plants and Power Generation Plants. He has experience in the use of Arc GIS Pro and Auto CAD 2D.

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The chapter has been reviewed by Mr. David Kiely, Managing Director of JOD. Mr. Kiely has 41 years 'experience in the civil engineering and environmental sector. He has obtained a Bachelor's Degree in Civil Engineering and a Master's in Environmental Protection, has overseen the construction of over 50 wind farms and has carried out numerous soils and geology assessments for EIARs. He has been responsible in the overall preparation of in excess of 60 EIARs.

## 4.2 IRISH PLANNING LEGISLATION AND POLICY CONTEXT

Table 4.1: Irish Planning Legislation and Policy Context on and Policy Context

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

Legislation / Policy	Context
National Energy Security Framework	Ireland has one of the highest rates of importing fuel in Europe with imported dependency increasing to 80% in 2021 according to the SEAI. Energy demand in Ireland has been growing and is expected to continue to increase by 37% to 2031. The high rate of imported fossil fuel dependency and the increasing demand for electricity make it vital to introduce more domestic renewable energy generation like the proposed Wind Farm development in County Offaly. The National Energy Security Framework (DECC, 2022) sets out how Ireland is seeking to phase out dependency on Russian gas, oil and coal imports in order to address the urgent need to secure a long-term, resilient energy supply.
Climate Action Plan 2024	The Plan was approved by Government on 20 December 2023, subject to Strategic Environmental Assessment and Appropriate Assessment. Climate Action Plan 2024 builds upon the previous plan (Climate Action Plan 2023) by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings, for example, a roadmap for taking decisive action to halve Irelands emissions by 2030 and to reach net zero no later than 2050. It also outlines the intention of the government to meet up to 80% of electricity demand from renewable power by 2030.
Climate Action and Low Carbon Development (Amendment) Act 2021	The Climate Action and Low Carbon Development (Amendment) Act 2021 supports Ireland's transition to Net Zero and a target of achieving a climate neutral economy by no later than 2050. It has established a legally binding framework containing clear targets and commitments which are set in law to embed the necessary structures and processes on a statutory basis to achieve our national, EU and international climate goals and obligations in the near and long term.

Legislation / Policy	Context
The National Planning Framework 2018-2027 and First Revision	The National Planning Framework (NPF) (which is given statutory recognition in the Planning and Development (Amendment) Act 2018) is intended to guide development and investment through a shared set of national objectives and principles. It is then left to the three regional planning bodies and the 31 city and county councils to take a lead in refining these into more detailed plans.  The First Revision was approved by the Oireachtas on 30 April 2025. This revision, which anticipates a population projection of between 6.1 and 6.3 million by 2040, builds upon the original 2018 NPF, reflects changes in Ireland and updates the planning framework for balanced regional development and sustainable growth. The revised NPF, along with the National Development Plan 2021, forms the overall planning and investment framework for Ireland's social, economic, and cultural development.
The National Development Plan 2021-2030	The National Development Plan (NDP) sets out the investment priorities that will underpin the implementation of the National Planning Framework, through a total investment of approximately €116 billion. This represents a very substantial commitment of resources and is expected to move Ireland close to the top of the international league table for per capita public investment.
Northern & Western Regional Assembly Regional Spatial & Economic Strategy 2020- 2032	The Local Government Reform Act 2014 provided for three new regional assemblies: the Northern and Western, Eastern and Midland and Southern Regions. Members of the Regional Assemblies consist of the local authorities within that region.  The Regional Spatial and Economic Strategy (RSES) for the Northern and Western Regional Assembly area provides a long-term regional level strategic planning and economic framework, to support the implementation of the National Planning Framework, for the future physical, economic and social development for the Northern and Western Region.

Legislation / Policy	Context
The Mayo County Development Plan 2022- 2028	Under Section 9 of the Planning and Development Act, each planning authority is obliged to make a Development Plan for the whole of its functional area. The Development Plan (City/County Development Plan [CDP]) is a statutory land-use plan generally consisting of a written statement and associated maps. The Development Plan is the statutory land use plan which sets out a strategy for the proper planning and sustainable development for the area.  The County Mayo Development Plan 2022-2028 was adopted in June 2022. The County Mayo Renewable Energy Strategy is included as part of the CDP 2022-2028.
The Wind Energy Development Guidelines, DoHLG 2006	The Wind Energy Development Guidelines (DoHLG, 2006) (WEDGs 2006) offer advice to planning authorities on planning for wind energy through the development plan process and in determining applications for planning permission. The guidelines are also intended to provide a consistency of approach throughout the country in the identification of suitable locations for wind energy development and the treatment of planning applications for wind energy developments.

Legislation / Policy	Context
Draft Revised Wind	The Developer will comply with aspects of the Draft Wind
Energy Development	Energy Guidelines 2019 (DWEDGs 2019) (meaning also
Guidelines (Department of	compliance with the 2006 WEDGs) in relation to shadow flicker,
Housing, Local	community engagement and visual amenity setback distances
Government and Heritage,	(4x tip height). However, as the current version WEDGs 2006
2019)	remain valid until the revised final version of the DWEDGs 2019
	are published by the government, the WEDGs 2006 have been
	complied with in some areas of assessment, such as in
	Chapter 11: Noise.
	The DWEDGs 2019 set out how wind energy is to be delivered
	in accordance with best practice and in particular, in
	partnership with people living in areas local to proposed
	developments. The Draft guidelines, provide a roadmap as to
	how Ireland's 2030 climate commitments can be met and
	ultimately move the country towards a position of net zero
	emissions by 2050. The key aspects for the new draft proposed
	wind energy guidelines include the following:
	A visual amenity setback of 4 times the turbine height
	between a wind turbine and the nearest residential
	property, subject to a mandatory minimum distance of 500
	metres
	The elimination of shadow flicker
	The application of a more stringent noise limit, consistent
	with World Health Organisation standards
	The introduction of new obligations in relation to
	community engagement with local communities along with
	the provision of community benefit measures.

Legislation / Policy	Context
The National Landscape	Ireland signed and ratified the Council of Europe's European
Strategy for Ireland 2015-	Landscape Convention (ELC) which came into effect on 1
2025	March 2004. The Convention has been ratified by thirty-eight
	countries. It obliges Ireland to implement policy changes and
	objectives concerning the management, protection and
	planning of the landscape. The National Landscape Strategy
	will be used to ensure compliance with the ELC and to establish
	principles for protecting and enhancing it while positively
	managing its change. It is a high-level policy framework to
	achieve balance between the protection, management and
	planning of the landscape by way of supporting actions.

#### 4.3 INTERNATIONAL CLIMATE POLICY

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

## 4.3.1 The United Nations Framework Convention on Climate Change

In 1992, fifty countries ratified 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. In addition, the UNFCCC seeks to 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 greenhouse gases. The framework sets no binding limits on greenhouse gas 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 greenhouse gases. The convention enjoys near universal membership, with 197 countries listed as being Parties to the Convention<sup>1</sup>.

<sup>&</sup>lt;sup>1</sup> https://climate-adapt.eea.europa.eu/en/metadata/organisations/united-nations-framework-convention-on-climate-change-unfccc [Accessed: 22/09/2025]

#### 4.3.2 The United Nations Sustainable Development Goals 2015

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

The Proposed Development positively contributes to the following UN Sustainable Development Goals:



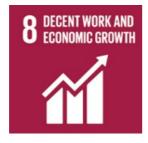
## (3) Good Health and Well-Being

By producing renewable energy, the Proposed Development contributes to the displacement of fossil fuels, which pollute the air, this improves air quality, which is closely linked to good health and well-being. See **Chapter 10: Air and Climate** for details.



## (7) Affordable and Clean Energy

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



#### (8) Decent Work and Economic Growth

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



## (9) Industrial, Innovation and Infrastructure

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



#### (11) Sustainable Cities and Communties

The renewable energy that the Proposed Development will generate will help support Ireland's low carbon transition and reduce anthropogenic greenhouse gases. The Proposed Development could provide power for to up to 12,000 homes with renewable energy.



#### (13) Climate Action

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

#### 4.3.3 The Kyoto Protocol (1997)

The Kyoto Protocol operationalised the United Nations Framework Convention on Climate Change by committing industrialized countries and economies in transition to limit and reduce greenhouse gas emissions, with agreed individual targets. It was adopted on the 11<sup>th</sup> of December 1997 by 192 parties, although only entered into force on the 16<sup>th</sup> of February 2005 due to a complex ratification process. Under the Kyoto Protocol, the EU agreed to achieve a significant reduction in total greenhouse gas emissions of 8 % below 1990 levels in the period 2008 to 2012. Ireland's contribution to the EU commitment for the period 2008 – 2012 was to limit its greenhouse gas emissions to no more than 13 % above 1990 levels.

## 4.3.4 The Doha Amendment to the Kyoto Protocol

In Doha, Qatar, on 8<sup>th</sup> December 2012, the "Doha Amendment to the Kyoto Protocol" was adopted. The amendment includes:

New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from 1<sup>st</sup> January 2013 to 31<sup>st</sup> December 2020.

A revised list of greenhouse gases (GHG) to be reported on by parties in the second commitment period; and amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period. During the first commitment period, 37 industrialised countries and the European Community committed to reduce GHG emissions to an average of 5 % against 1990 levels. During the second commitment period, parties, including Ireland, committed to reduce GHG emissions by at least 18 % below 1990 levels in the eight-year period from 2013 to 2020; however, the composition of parties in the second commitment period is different from the first.

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.

### **4.3.5 COP21 – The Paris Agreement (2015)**

The Paris Agreement is a legally binding international treaty on climate change. It was adopted by 196 Parties at COP 21 in Paris, on 12th December 2015 and entered into force on 4 November 2016. It seeks to accelerate and intensify the actions and investment needed for a sustainable low carbon future. Its central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. The Agreement also aims to strengthen the ability of countries to deal with the impacts of climate change. The Paris Agreement commits the EU as a whole to reduce greenhouse gas emissions by at least 40 % by 2030, compared with 1990 levels. This figure was revised upwards under Article 4 of Regulation 2021/1119 by the EU in April 2021 to a 55 % domestic Green House Gas reduction by 2030 compared to 1990. However, a report by the International Energy Agency (IEA) cautions that renewables growth will still need to double to reach the Paris Agreement goal of achieving netzero emissions by 2050. The International Renewable Energy Agency (IRENA), an intergovernmental organisation focusing on sustainable energy, in a report on the Nationally Determined Contributions relating to renewable energy also note that even

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

#### 4.3.6 COP26 – Glasgow (2021)

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

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

## 4.3.7 COP27 – Egypt (2022)

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

## 4.3.8 COP28 – United Arab Emirates (2023)

The SEAI (Sustainable Energy Authority of Ireland) 2023 Report<sup>2</sup> underscores that COP28 took place in Dubai. Simultaneously, reports from the Global Carbon Project indicate that the world is projected to surpass the consumption of coal, oil, and gas in 2023 compared to 2022. In light of this concerning global trend, some experts estimate that achieving global net-zero emissions by 2040 is essential to stay within the target of limiting warming to 1.5 degrees.

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

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<sup>&</sup>lt;sup>2</sup> SEAI Energy in Ireland 2023: <a href="https://www.seai.ie/publications/Energy-in-Ireland-2023.pdf">https://www.seai.ie/publications/Energy-in-Ireland-2023.pdf</a> [Accessed: 22/09/2025]

from fossil fuels to renewables such as wind and solar power in their next round of climate commitments.

Out of 189 Parties that have ratified the Paris Agreement, 90 % mentioned renewables and roughly 70 % included quantifiable energy targets in their initial Nationally Determined Contributions. However, a report by the International Energy Agency (IEA) cautions that renewables growth will still need to double to reach the Paris Agreement goal of achieving net-zero emissions by 2050. The International Renewable Energy Agency (IRENA), an intergovernmental organisation focusing on sustainable energy, in a report on the Nationally Determined Contributions relating to renewable energy also note that even with the renewable energy pledges in the 2021 Paris agreement, the 1.5 °C goal will still be exceeded before the end of the century.

## 4.3.9 COP29 – Azerbaijan (2024)

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

## 4.3.10 Project Compliance with International Climate Policy

Ireland is one of the 186 countries signed up to the Paris agreement, under the terms, Ireland is required to reduce greenhouse gas emissions by at least 40 % by 2030 when compared with levels in 1990. The Proposed Development will contribute to Ireland meeting these targets by displacing reliance on fossil fuels.

#### 4.3.11 Bern Convention

The Convention aims to ensure conservation of wild flora and fauna species and their habitats. Special attention is given to endangered and vulnerable species, including endangered and vulnerable migratory species specified in appendices.

The Parties undertake to take all appropriate measures to ensure the conservation of the habitats of the wild flora and fauna species. Such measures should be included

in the Parties 'planning and development policies and pollution control, with particular attention to the conservation of wild flora and fauna. The Parties undertake to promote education and disseminate general information concerning the need to conserve species of wild flora and fauna and their habitats.

The Convention establishes a Standing Committee on which the Parties are represented by their delegates. The Committee's principal task is to monitor the provisions of this Convention in the light of development of the wild flora and the assessment of its needs. For this purpose, the Standing Committee is especially competent to make recommendations to the Parties and amendments to the appendices where these protected species are specified.

#### 4.4 EUROPEAN LEGISLATION & POLICY CONTEXT

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

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

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

The EU will be climate neutral by 2050. To do this, it will carry out a series of initiatives that will protect the environment and boost the green economy<sup>3</sup>.

#### 4.4.1 EU Directive 2011/92/EU (as amended by EU Directive 2015/52/EU)

European Union Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment (the 'EIA Directive'), was transposed

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<sup>&</sup>lt;sup>3</sup> European Commission.https://climate.ec.europa.eu/eu-action/climate-strategies-targets/2050-long-term-strategy\_en [Accessed 22/09/2025]

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

The EIA Directive defined the EIA process as a process consisting of:

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

#### 4.4.2 Renewable Energy Directive

The EU produced the Renewable Energy Directive (REDI) 2009/28/EC, to make the EU a global leader in renewable energy and ensure that the target of the final energy consumption being at least 16 % renewables by 2020 and 27 % renewables are met by 2030. In 2015, the EU set itself a long-term goal of reducing greenhouse gas emissions by 80-95 %, when compared to 1990 levels, by 2050. Under the 2009 Renewable Energy Directive (REDI), Ireland committed to produce at least 16 % of all energy consumed by 2020 from renewable sources. Ireland did not meet its 2020 target for overall Renewable Energy Share resulting in Ireland being obligated to acquire statistical transfers of 3.3 TWh of renewable energy from other Member States to compensate for this shortfall.

From 2021, REDI was replaced by the second Renewable Energy Directive (REDII), Directive (EU) 2018/2001, which continues to promote the growth of renewable energy out to 2030. The recast directive sets a new binding renewable energy target

for the EU for 2030 of at least 32 %, with a clause for a possible upwards revision by 2023.

In 2023, the European Union (EU) adopted an amendment of the Renewable Energy Directive, Directive (EU) 2018/2001, referred to as "RED III". RED III raises the share of renewable energy in the European Union's overall energy consumption to 42.5 % by 2030, with an additional 2.5 % indicative top-up to allow the target of 45 % to be achieved.

## 4.4.3 The European Green Deal 2019

The European Green Deal 2019 resets the European Commission's commitment to tackling climate and environmental-related challenges. It focuses on three key principles for the clean energy transition, which will help reduce greenhouse gas emissions and enhance the quality of life of our citizens:

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

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

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

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

#### 4.4.4 REPowerEU

In May 2022, the European Commission presented the REPowerEU Plan<sup>4</sup>, in response to the global energy market disruption caused by Russia's invasion of Ukraine. It puts forwards a set of actions to:

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

#### It states:

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

The REPowerEU Plan also includes proposed amendments to the Renewable Energy Directive<sup>5</sup> including:

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

In 2021, the EU reached a 21.8 %<sup>6</sup> share of its gross final energy consumption from renewable sources – down from 22 % in 2020. This leaves a long way to go to reach this increased target. In accordance with the REPowerEU Communication, in May

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<sup>&</sup>lt;sup>4</sup> European Commission. (2022). REPowerEU Plan <a href="https://eur-lex.europa.eu/resource.html?uri=cellar:fc930f14-d7ae-11ec-a95f-01aa75ed71a1.0001.02/DOC">https://eur-lex.europa.eu/resource.html?uri=cellar:fc930f14-d7ae-11ec-a95f-01aa75ed71a1.0001.02/DOC</a> 1&format=PDF [Accessed 22/09/2025]

<sup>&</sup>lt;sup>5</sup> European commission. (2022). <a href="https://eur-lex.europa.eu/legal">https://eur-lex.europa.eu/legal</a><a href="https://eur-lex.europa.eu/legal">content/EN/TXT/PDF/?uri=CELEX:52022PC0222&from=EN</a> [Accessed 22/09/2025]

<sup>&</sup>lt;sup>6</sup> European Commission. (2023). https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Renewable\_energy\_statistics#Share\_of\_renewable\_energy\_more\_than\_doubled\_between\_2004\_and\_2020 [Accessed 22/09/2025]

2022, the Commission published a recommendation<sup>7</sup> on speeding up permit-granting procedures for renewable energy projects, accompanied by guidance to help the Member States speed up permitting for renewable energy plants.

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

#### Recommendations include:

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

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

#### 4.4.5 Renewable Deployment Acceleration

Regulation 2022/2577

In recognition of the worsening energy crises arising from Russia's war against Ukraine, the Council of the European Union adopted Regulation (EU) 2022/2577 on

<sup>&</sup>lt;sup>7</sup> EU. https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=PI\_COM:C(2022)3219&from=EN [Accessed 22/09/2025]

22 December 2022, laying down a framework to accelerate the deployment of renewable energy. This regulation applies to "all permit-granting processes that have a starting date within the period of its application" and includes a number of tangible measures aimed at streamlining the permit-granting process and facilitating the accelerated deployment of renewable energy. The period of application of the Regulation is 18 months from the 30 December 2022 and therefore applies to current EIAs. This validation period has since been extended by Regulation (EU) 2024/223 as outlined below in this section.

Central to the regulation is the rebuttable presumption that renewable energy developments are in the overriding public interest when addressing competing interests under the Habitats Directive, Birds Directive and the Water Framework Directive and that renewable energy projects should be given priority when balancing legal interests in a given case – Article 3:

- (1) The planning, construction and operation of plants and installations for the production of energy from renewable sources, and their connection to the grid, the related grid itself and storage assets shall be presumed as being in the overriding public interest and serving public health and safety when balancing legal interests in the individual case, for the purposes of Article 6(4) and Article 16(1)(c) of Council Directive 92/43/EEC, Article 4(7) of Directive 2000/60/EC of the European Parliament and of the Council and Article 9(1)(a) of Directive 2009/147/EC of the European Parliament and of the Council....
- (2) Member States shall ensure, at least for projects which are recognised as being of overriding public interest, that in the planning and permit-granting process, the construction and operation of plants and installations for the production of energy from renewable sources and the related grid infrastructure development are given priority when balancing legal interests in the individual case<sup>8</sup> .... (emphasis added)

The Regulation was introduced as a temporary, emergency measure and included provision for the EU Commission to review the application of, and continued need for, the measures included in the Regulation. The Commission completed its review of the Regulation and furnished its report to the Council on the 28 November 2023. In its report the Commission recommended the prolongation of the validity of certain

<sup>&</sup>lt;sup>8</sup> Official Journal of the European Union: https://eur-lex.europa.eu/oj/direct-access.html [Accessed 22/09/2025]

measures in the Regulation, including Article 3(2), and by Regulation 2024/223 of the 22 December 2023 the Council of the European Union, Regulation 2022/2577 was extended and amended, with Article 3 applying to the all permit-granting processes commenced up to the 30 June 2025. This regulation (Regulation 2024/223) applies from 1 July 2024 and is relevant to this EIA.

The importance, continued need and effectiveness of Article 3(2) of Regulation 2022/2577 in aiding the accelerated deployment of renewable energy is explained in Recital 14 of Regulation 2024/223:

'Article 3(2) of Regulation (EU) 2022/2577 requires priority to be given to projects that are recognised as being of overriding public interest whenever the balancing of legal interests is required in individual cases and where those projects introduce additional compensation requirements for species protection... The first sentence of Article 3(2) of Regulation (EU) 2022/2577 has the potential, in the current urgent and still unstable energy situation on the energy market which the Union is facing, to further accelerate renewable energy projects since it requires Member States to promote those renewable energy projects by giving them priority when dealing with different conflicting interests beyond environmental matters in the context of Member States' planning and the permit-granting 'process. The Commission's report demonstrated the value of the first sentence of Article 3(2) of Regulation (EU) 2022/2577 which recognises the relative importance of renewable energy deployment in the current difficult energy context beyond the specific objectives of the derogations foreseen in the Directives referred to in Article 3(1) of Regulation (EU) 2022/2577. Given the particularly severe situation in the supply of energy which the Union is currently facing, it is appropriate to prolong the application of Article 3(2) of Regulation (EU) 2022/2577 in order to appropriately recognise the crucial role played by renewable energy plants to fight climate change and pollution, reduce energy prices, decrease the Union's dependence on fossil fuels and to ensure the Union's security of supply in the context of the balancing of legal interests carried out by permit-granting authorities or national courts. At the same time, it is also appropriate to keep the environmental safeguard that, for projects recognised as being of overriding public interest, appropriate species conservation measures, underpinned by sufficient financial resources, are adopted.'

## 4.4.6 Project Compliance with European Climate Legislation

The Proposed Development is compliant with EU policy and legislation as it contributes towards the goal of decarbonising the energy sector in the EU and increasing the supply of renewable energy sources. The Proposed Development is anticipating to have an installed capacity of 77.40 MW of renewable energy which would contribute towards the RED targets for 2030 and help prevent further requirements to acquire transfers from other Member States.

#### 4.5 NATIONAL, REGIONAL AND LOCAL CLIMATE POLICY AND LEGISLATION

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



Plate 4.1: Hierarchy of Plans in Ireland

The National Planning Framework is assessed in **Section 4.5.** The Regional Spatial and Economic Strategy is assessed in **Section 4.6.1**. The relevant County Development Plan is assessed in **Section 4.6.2**. The Proposed Development is not located in a Local Area plan.

## 4.5.1 National Climate Policy and Legislation

## 4.5.1.1 Project 2040

Ireland has developed a strategic outlook for the future development of the country under 'Project Ireland 2040'. Project 2040 comprises two plans, The National Planning Framework (NPF) and the ten-year National Development Plan (NDP)

which will guide strategic development and infrastructure investment at the national level.

The NDP 2018-2027 sets out investment priorities of €21.8 billion for climate action for the 10-year period, €7.6 billion is to come from the Exchequer. The remaining investment is to be made by Ireland's semi-state companies and by the private sector. In addition, some €8.6 billion in funding has been made available for sustainable mobility projects, mostly in public transport. This substantial funding increase will facilitate upscaling of investments and implementation of actions needed to move the country towards its 2030 climate targets.

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

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

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

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

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

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

## Transition to a Low Carbon and Climate Resilient Society

'The Climate Action and Low Carbon Development (Amendment) Act was enacted in 2021 with a commitment to a legally binding target to reduce greenhouse gas emissions by 51 % and increase the share of electricity generated from renewable sources to 80 % over the decade (2021 – 2030), and to achieve net zero emissions no later than 2050. This objective will shape investment choices over the coming decades in line with the National Climate Action Plan 2024 and the National Adaptation Framework. New energy systems and transmission grids will be necessary for a more distributed, renewables-focused energy generation system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy to the major sources of demand."

## **National Policy Objective 69**

"Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions."

## **National Policy Objective 70**

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

In the revised NPF there is the addition of regional renewable energy allocations, to be integrated into Regional Spatial and Economic Strategies and the associated Regional Renewable Energy Strategies. Each Region must plan for sufficient wind and solar energy development to achieve both the MW targets set out in the revised NPF and the 2030 national renewable electricity generation targets. For onshore wind, the Northern and Western regions will need to increase their energised

capacity significantly to meet their allocation of 1,389 MW (with 1,761 MW capacity at present).

In terms of future actions to look out for, the revised NPF suggests the Department of the Environment, Climate and Communications will prepare an Offshore Transmission Strategy to ensure enabling infrastructure supports the development of offshore renewable energy, although there is no date for delivery.

The Proposed Development will generate renewable energy, reducing Ireland's carbon footprint by displacing fossil fuels and contributing to climate policy mitigation objectives. It is located in areas designated as "Open to Consideration" and "Preferred" for wind energy development (see **Figure 4.1**) in the Mayo County Development Plan 2022-2028. As discussed in **Chapter 3: Alternatives**, the Site has been assessed against a number of alternatives and has been found to be in an appropriate location given consideration to the main criteria such distances from dwellings, wind speeds, potential environmental effects and use of existing available grid connection.

The Proposed Development will generate renewable energy, reducing Ireland's carbon footprint by displacing fossil fuels and contributing to climate policy mitigation objectives.

## 4.5.1.2 Climate Action and Low Carbon Development (Amendment) Act 2021

At a national level, the Climate Action and Low Carbon Development Act 2015, as amended by the Climate Action and Low Carbon Development (Amendment) Act 2021 commits Ireland to reach a legally binding target of net-zero emissions no later than 2050, and a cut of 51 % by 2030 (compared to 2018 levels). It establishes a framework with clear, legally binding targets and commitments, and ensures the necessary structures and processes are embedded on a statutory basis to achieve Ireland's national, EU and international climate goals and obligations in the near and long term.

The Act includes the following key elements:

• It places on a statutory basis a 'national climate objective', which commits Ireland to pursue and achieve no later than 2050, the transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy.

• It embeds the process of carbon budgeting into law. Government are required to adopt a series of economy-wide five-year carbon budgets, including sectoral targets for each relevant sector, on a rolling 15-year basis, starting in 2021.

- Actions for each sector will be detailed in the Climate Action Plan, updated annually.
- A National Long Term Climate Action Strategy will be prepared every five years. A recent report from the EPA Ireland's Greenhouse Gas Emissions Projections<sup>9</sup> found that Ireland is not on track to meet the 51 per cent emissions reduction target (by 2030 compared to 2018), indicating that further measures are needed.

## 4.5.1.3 Climate Emergency

On 29<sup>th</sup> November 2019 the European Parliament declared a climate emergency ahead of the UN COP 25 in Madrid in December 2019. In May 2019, the Oireachtas declared a "climate emergency" in an amendment to the report 'Climate Action: A cross-party consensus for action 'which followed the recommendations of the Citizens Assembly on Climate Action. There then followed the publication of the Cross-Departmental Climate Action Plan 2019 on 17<sup>th</sup> June 2019 this was revised in 2021 and 2023.

#### 4.5.1.4 Climate Action Plans 2019- 2025

In May 2019, the Irish Dail declared a "climate emergency". As a response to combat this emergency the Government published the Climate Action Plan 2019 on the 17<sup>th</sup> of June 2019. The plan recognises that decisive and urgent action is required to arrest the acceleration of greenhouse gas emissions within the limited window of opportunity that remains.

The Climate Action Plan 2021 was published in November 2021.

## Climate Action Plan 2023 (Cap 2023)

On the 21<sup>st</sup> of December 2022 the *Climate Action Plan 2023 (CAP 2023)* was published to replace the 2021 Plan. The CAP 2023 provides a detailed plan for taking decisive action to achieve a 51 % reduction in overall greenhouse gas emissions by 2030 and setting us on a path to reach net-zero emissions by no later than 2050, as committed to in the Program for Government and set out in the Climate Act 2021.

<sup>&</sup>lt;sup>9</sup> EPA 2023. <a href="https://www.epa.ie/our-services/monitoring--assessment/climate-change/ghg/">https://www.epa.ie/our-services/monitoring--assessment/climate-change/ghg/</a> [Accessed 22/09/2025]

It included increased renewable electricity targets, the end of single use non-recyclable plastics and new building regulations. The Plan included a new commitment to make Ireland 100 % carbon neutral by 2050 and contained action points designed to achieve our national climate change targets.

## The main points in the 2023 Plan, in relation to electricity generation are as follows:

- Increase renewable electricity wind and solar up to 80 % by 2030
- Separate small scale generator scheme for farmers, business and communities to generate electricity and sell to the grid
- Reduce emissions from electricity by 75 % from 2018 levels
- Deliver three new transmission grid connections or interconnectors to Northern Ireland, Great Britain, and the EU
- Complete the phase-out of coal and peat-fired electricity generation
- Review data centre strategy to ensure the sector supports renewables and emissions targets

## Climate Action Plan 2024 (CAP 2024)

The Climate Action Plan 2024<sup>10</sup> sets out a detailed sectoral roadmap designed to deliver a 51 % reduction in greenhouse gas (GHG) emissions by 2030. This requires significant reductions from all sectors. The Plan aims to evaluate in detail the changes that are required in order "to halve our emissions by 2030 and reach net zero no later than 2050, as we committed to in the Programme for Government".

CAP 2024 outlines six vital high impact sectors, of which one is "Renewable Electricity Share", where it intends to increase renewable generation to supply 80 % of demand by 2030. The driving force behind this aim is the intention to facilitate a large-scale deployment of renewables that will be critical to decarbonizing the power sector as well as enabling the electrification of other technologies.

The CAP 2024 shows how Ireland is putting climate solutions at the very heart of our social and economic development. Among the most important measures in the plan

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<sup>&</sup>lt;sup>10</sup> Department of the Environment, Climate and Communications (2023), Climate Action Plan 2024. Available at: <a href="https://www.gov.ie/en/publication/79659-climate-action-plan-2024/">https://www.gov.ie/en/publication/79659-climate-action-plan-2024/</a> [Accessed on 22/09/2025]

is a target of <u>9 GW from onshore wind</u>, 8 GW from solar, and at least 5 GW of offshore wind energy by 2030.

The Plan sets an 80 % target for electricity production from renewable sources by 2030 and highlights the need to remove barriers to the development of renewables, including onshore wind. The plan identifies that this will directly reduce emissions but also help with the electrification of other sectors such as transport and heat, reducing emissions in those sectors too. The plan notes that the transition away from fossil fuels and towards locally generated renewables will improve energy security and Ireland's dependence on imported energy.

The Key Message from CAP 2024 (Chapter 12) with regard to electricity is stated as follows:

"The electricity sector continues to face an immense challenge in meeting its requirements under the sectoral emissions ceiling, as the decarbonisation of other sectors, including transport, heating, and industry, relies to a significant degree on electrification. The deployment rates of renewable energy and grid infrastructure required to meet the carbon budget programme for electricity is unprecedented and requires urgent action across all actors to align with the national targets".

Section 12.1.3 of the CAP 2024 sets out the scale of the challenge for the electricity sector:

"At a time when the energy system is under severe pressure to ensure security of supply, amid projections of rapid electricity demand growth over the coming decade, the electricity sector has been set one of the smallest carbon budget allocations and the steepest trajectory (-75%) across all sectors. The scale of the challenge to meet the sectoral emissions ceiling is immense and requires policies to be moved from an 'end of decade' target trajectory towards a 'remaining carbon budget' target".

Section 12.3 outlines the projections for the energy sector. The CAP 2024 clearly outlines the need to accelerate the deployment of renewable energy:

"Given that the programme of large-scale offshore wind deployment is expected to be realised towards the end of the 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.

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".

In short, CAP 2024, approved by Government on 21 May 2024, highlights the national obligation to increase the deployment of renewables including onshore wind to meet our legally binding sectoral emissions targets. In this regard, it stresses and makes abundantly clear that the rate of required renewable deployment is unparalleled and must be circa eight times faster in the period 2024 - 2030 than the historical average.

## Climate Action Plan (CAP 2025)

CAP25 is the third annual statutory update to Ireland's Climate Action Plan. It highlights the important work being done by several industry bodies to deliver greater amounts of renewable energy capacity. CAP25 re-affirms the previous commitment to increasing the share of renewable electricity to 50 % by 2025 and 80 % by 2030. Overall, the share of renewable electricity generation in Ireland increased from 38.6 % to 40.7 % from 2022 to 2023. The figure for 2024 will most likely fall somewhere between 40 % and the interim, end of year target of 50 % set out in CAP25.

## The targets are:

- Onshore wind, 2 GWs by 2025 and 9 GWs by 2030
- Offshore wind, at least 8 GWs by 2030
- Solar, up to 5 GW by 2025 and 8GW by 2030

These targets are unchanged for the previous two years. The Renewable Energy Support Scheme (**RESS**) continues to support the deployment of renewable energy projects. There was an additional 1,334 MW (more than a 20 % increase on current installed capacity) of renewable generation capacity secured in 2024. The timetable for the fifth RESS auction (**RESS 5**) is due to be published.

## 4.5.1.5 National Energy & Climate Plan 2021-2030

The National Energy and Climate Plan (NECP)<sup>11</sup> is a ten-year integrated document mandated by the European Union to each of its member states in order for the EU to meet its overall greenhouse gases emissions targets.

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

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

Key, relevant renewable energy objectives include:

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

Key, relevant energy security objectives include:

- Support efforts to increase indigenous renewable sources in the energy mix, including wind, solar and bioenergy.
- Facilitate infrastructure projects, including private sector commercial projects, which enhance Ireland's security of supply and are in keeping with Ireland's overall climate and energy objectives.

According to a report published by the Environmental Protection Agency (EPA) in June 2023, Ireland will achieve a reduction of only 29 % in its greenhouse gas emissions by 2030, far short of a legally binding target of 51 %. Almost all sectors are

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<sup>&</sup>lt;sup>11</sup>Department of Communications, Climate Action and Environment. (2021). National Energy and Climate Plan <a href="https://energy.ec.europa.eu/system/files/2020-08/ie\_final\_necp\_main\_en\_0.pdf">https://energy.ec.europa.eu/system/files/2020-08/ie\_final\_necp\_main\_en\_0.pdf</a> [Accessed 22/09/2025]

on a trajectory to exceed their national ceilings – including agriculture, industry, electricity and transport. The EPA report warns that the 2030 targets can only be reached by "implementing policies that deliver emission reductions across all sectors of the economy in the short term".<sup>12</sup>

#### 4.5.1.6 National Energy Security Framework 2022

In April 2022, the Government of Ireland issued the National Energy Security Framework <sup>13</sup> in response to the European Commission's REPowerEU action statement. It provides a single overarching and initial response to address Ireland's energy security needs in the context of the war in Ukraine. It sets out how Ireland is seeking to phase out dependency on Russian gas, oil and coal imports as soon as possible, emphasising throughout the urgency of the need to secure Irelands energy supply.

It is focused on three areas of work:

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

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

"The war has highlighted key dependencies in our energy system which can no longer be relied on and has led to affordability issues for many consumers and businesses". The framework builds on the idea of energy security as the uninterrupted availability of energy sources at an affordable price and is a response to the challenges of ensuring the ongoing and long-term security of affordable energy supply.

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<sup>&</sup>lt;sup>12</sup> Environmental Protection Agency. (2023) Ireland's Greenhouse Gas Emissions Projections.
<a href="https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA-GHG-Projections-2022-2040">https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA-GHG-Projections-2022-2040</a> Finalv2.pdf 08/02/2024 [Accessed: 22/09/2025]

<sup>&</sup>lt;sup>13</sup> Government of Ireland. (2022) National Energy Security Framework. <a href="https://assets.gov.ie/221399/86cb99f5-58e3-4821-bc4c-e1bb1fa706fb.pdf">https://assets.gov.ie/221399/86cb99f5-58e3-4821-bc4c-e1bb1fa706fb.pdf</a> [Accessed: 22/09/2025]

The new framework underlines the importance of new renewable energy generation projects, such as the Tirawley Wind Farm, in securing Ireland's energy supply in light of the war in Ukraine and resulting energy supply issues.

## 4.5.1.7 Energy Security in Ireland to 2030

Energy Security in Ireland to 2030 outlines a new strategy to ensure energy security in Ireland for this decade, while ensuring a sustainable transition to a carbon neutral energy system by 2050. This report is being published as part of an Energy Security Package, containing a range of supplementary analyses, consultations, and reviews, which have informed the recommendations and actions related to energy security. Informed by the Government's energy security policy objectives - to ensure energy is affordable, sustainable, and secure - the review considered the risks to oil, natural gas, and electricity. The report sets out that Ireland's future energy will be secure by moving from an oil and gas-based energy system to an electricity-led system, maximising our renewable energy potential, flexibility and being integrated into Europe's energy systems. Meeting our climate, renewable, and energy efficiency targets through actions and measures set out in the annually updated Climate Action Plan will deliver this secure energy future.

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

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

Under each of these four areas of actions, the report sets out a range of mitigation measures, including the need for additional capacity of indigenous renewable energy, but also energy imports, energy storage, fuel diversification, demand side response, and renewable gases. The governance structures supporting the energy system, including oversight and accountability reforms, were also examined.<sup>14</sup>

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<sup>&</sup>lt;sup>14</sup> https://www.gov.ie/en/publication/5c499-energy-security-in-ireland-to-2030/ [Accessed: 22/09/2025]

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

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

- An Enabling Framework for Community Participation through the provision of pathways and supports for communities to participate in renewable energy projects
- Increasing Technology Diversity by broadening the renewable electricity technology mix (the diversity of technologies)
- Delivering an ambitious renewable electricity policy to 2030
- Increasing energy security, energy sustainability and ensuring the cost effectiveness of energy policy

It has been designed to promote investment in renewable energy generation to support the growth of the green economy, create sustainable work opportunities, and ultimately benefit the consumer as renewables become more cost effective. The Programme for Government commits to hold RESS auctions at frequent intervals throughout the lifetime of the scheme. This will allow Ireland to take advantage of falling technology costs and avoid 'locking in' higher costs for consumers. If consented the Proposed Development will also provide a community fund calculated in accordance with the Renewable Electricity Support Scheme (RESS) Terms and Conditions at €2 per MWh of electricity produced by the project. This is to be made available to the local community for the duration of the RESS (15 years).

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

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

Overall, provisionally successful projects in the RESS 4 auction are set to increase Ireland's renewable energy capacity by more than 20 %.<sup>15</sup>

## 4.5.1.9 White Paper on Energy Policy in Ireland 2015 – 2030

A Government White Paper entitled 'Ireland's Transition to a Low Carbon Energy Future 2015-2030' was published in December 2015 by the Department of Communications, Energy and Natural Resources<sup>16</sup>. This Paper provides a complete energy update and a framework to guide policy up to 2030. The Paper builds upon the White Paper published in 2007 and takes into account the changes that have taken place in the energy sector since 2007. The White Paper states the advances in Ireland's energy efficiency and renewable energy and generation use between 2007 and 2015. Renewable electricity sources (including wind) accounted for 27 % of Ireland's electricity consumption in 2015, which was just over halfway to Ireland's 2020 target of 40 % (Energy in Ireland: 2016 Report, SEAI, November 2016).

The policy framework sets out a vision for a low carbon future that maintains Ireland's competitiveness and ensures a supply of affordable energy. The paper advises that a range of policy measures will be employed to achieve this vision and will involve generating electricity from renewable sources, of which there is plentiful indigenous supplies, and increasing the use of electricity and bio-energy to heat homes and fuel. The impacts of climate change in the context of EU and national policy refers to the change in climate that is attributable to human activity arising from the release of greenhouse gases into the atmosphere and which is additional to natural climate variability (Department of the Environment, Heritage and Local Government, 2006). In 2008, the Environmental Protection Agency (EPA) published the results of a study entitled 'Climate Change - Refining the Impacts for Ireland', as part of the STRIVE (Science, Technology, Research and Innovation) Programme 2007 – 2013. This report states that mean annual temperatures in Ireland have risen by 0.7° Celsius (C) over the past century. Mean temperatures in Ireland relative to the 1961 to 1990 averages are likely to rise by 1.8 to 4.0 °C by the 2050s and by in excess of 2 °C by the end of the century due to climate change.

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<sup>&</sup>lt;sup>15</sup> https://kpmg.com/ie/en/home/insights/2024/09/renewable-electricity-support-scheme-ress-4-auction-esg.html [Accessed: 22/09/2025

<sup>&</sup>lt;sup>16</sup> https://www.gov.ie/pdf/?file=https://assets.gov.ie/77389/e5aa9f25-da81-43eb-804d-57309615681e.pdf#page=null [Accessed: 22/09/2025]

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

"Barriers to this, both scientific and socio-economic, are required to be identified and addressed in order that Ireland can be optimally positioned to thrive in a changing world."

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

## 4.5.1.10 Emissions Projections

In 2021, the EPA published an update on Ireland's Greenhouse Gas Emissions Projections to 2040<sup>17</sup>. Ireland's target is to achieve a 30 % reduction of non-Emissions Trading Scheme (non-ETS) sector emissions, i.e. agriculture, transport, residential, commercial, non-energy intensive industry and waste, on 2005 levels, with annual binding limits set for each year over the period 2020 – 2030.

Greenhouse gas emissions are projected to 2040 using two scenarios; 'With Measures' and 'With Additional Measures'. The 'With Measures' scenario assumes that no additional policies and measures, beyond those already in place by the end of 2019 are implemented. The 'With Additional Measures' scenario assumes implementation of the 'With Measures' scenario in addition to full achievement of Government renewable and energy efficiency targets for 2040, as set out in the National Renewable Energy Action Plan and the National Energy Efficiency Action Plan.

The EPA Emission Projections (2021) notes the following key trends:

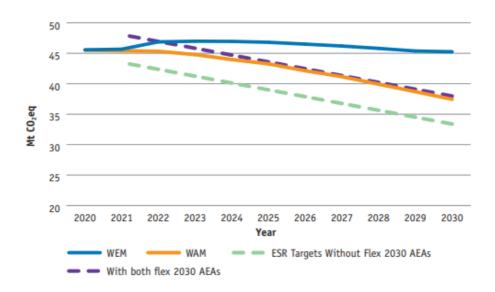
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<sup>&</sup>lt;sup>17</sup> https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA-Irelands-Greenhouse-Gas-Emissions-Projections-report-2020-2040v2.pdf [Accessed: 22/09/2025]

Ireland's non-Emissions Trading Scheme (ETS) emissions are projected to be
 6 % and 11 % below 2005 levels in 2030 under the 'With Measures 'and 'With Additional Measures 'scenarios, respectively. The target for Ireland is a 30 % reduction.

Ireland is projected to cumulatively exceed its Effort Sharing Regulation (ESR) emissions allocation in both scenarios over the period 2020 – 2030. Ireland is projected under the scenario 'With Existing Measures 'to cumulatively exceed its compliance obligations by 51.3 Mt CO<sub>2</sub> (metric tonnes of Carbon Dioxide). Under the 'With Additional Measures 'scenario Ireland is predicted to cumulatively exceed its compliance obligation by 11 Mt CO<sub>2</sub>.

**Graph 4.1** (Figure 15 of Ireland's Greenhouse Gas Emissions Projections to 2040) should only be used a visual interpretation.



Graph 4.1. Projected Non ETS emissions and estimated Annual Emission Allocations (AEAs) with and without use of flexibilities under the Effort Sharing Regulation (ESR) for the period 2021 - 2030.

It is clear that, Ireland faces significant challenges in meeting emission reduction targets for 2030 and beyond. In the EPA's document "Ireland's Greenhouse Gas Emission Projections 2020 - 2040" published in June 2021, under the "With Additional Measures Scenario", Ireland is projected to cumulatively exceed its obligations in relation to emissions reduction by 11 million tonnes  $CO_2$  equivalent over the period 2020-2030.

Ireland's GHG Emissions Projections 2022-2040<sup>18</sup> was published in June 2023. This builds on the 2021 report. This reported that Ireland is not on track to meet the 51 per cent emissions reduction target (by 2030 compared to 2018). It is projected that Ireland can meet its original EU Effort Sharing Regulation target of a 30 per cent emission reduction by 2030 (compared to 2005) if all measures and flexibilities, including the Land Use, Land Use Change & Forestry (LULUCF) flexibility, are used. Reaching the new 42 per cent EU emission reduction target will require full and rapid implementation of Climate Action Plan 2023 measures and further measures to be implemented. However, the first two carbon budgets (2021-2030), which aim to support achievement of the 51 per cent emissions reduction goal, are projected to be exceeded by a significant margin of between 24 and 34 per cent.

## 4.5.2 Strategic Planning Context

# 4.5.2.1 Key Sustainability Elements of the National Planning Framework and the First Revision

A key focus running throughout the NPF is the fostering of a transition toward a low carbon, climate-resilient society. In this regard the NPF states that Ireland must reduce greenhouse gas emissions from the energy sector by at least 80 % by 2050, compared to 1990 levels". Furthermore, the framework states: In the energy sector, transition to a low carbon economy from renewable sources of energy is an integral part of Ireland's climate change strategy and renewable energies are a means of reducing our reliance on fossil fuels".

The NPF further states the need to develop capacity for new forms of self-reliance including reducing our dependence on imported energy" and references the National Climate Policy Position which established the fundamental national objective of achieving transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050.

In relation to energy production, the NPF emphasises that rural areas have a strong role to play in securing a sustainable renewable energy supply for the country and

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<sup>&</sup>lt;sup>18</sup> https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/irelands-greenhouse-gas-emissions-projections-2022-2040.php [Accessed 22/09/2025]

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acknowledging that rural areas have significantly contributed to the energy needs of the country.

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.

Section 10 sets out a series of desired National Strategic Outcomes (NSOs), underpinned by the National Planning Objectives (NPOs) set out in the NPF in combination with governance arrangements and aligned with capital investment. The transition towards a low carbon and climate resilient society is identified as one of the national strategic outcomes to guide the implementation of the NPF wherein is it stated:

"Deliver 40 % of our electricity needs from renewable sources by 2020 with a strategic aim to increase renewable deployment in line with EU targets and national policy objectives out to 2030 and beyond. It is expected that this increase in renewable deployment will lead to a greater diversity of renewable technologies in the mix."

The NPF further emphasises that new energy systems and transmission grids will be necessary for a more distributed, more renewables-focused energy generation system to harness the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar. The NPF recognises that the development of on-shore and off-shore renewable energy is critically dependent on the development of enabling infrastructure including grid facilities to connect to major sources of energy demand.

Moreover, the NPF states the need to Roll-out of the National Smart Grid Plan enabling new connections, grid balancing, energy management and micro grid development."

The National Planning Framework (NPF) is the overarching policy and planning strategy for the social, economic and cultural development of Ireland. The framework aims to promote a more environmentally focused planning system at a local level. The first revision was approved by the Oireachtas on 30 April 2025. This revision, which anticipates a population projection of between 6.1 and 6.3 million by 2040, builds upon the original 2018 NPF, reflects changes in Ireland and updates the planning framework for balanced regional development and sustainable growth. The revised NPF, along with the National Development Plan 2021, forms the overall planning and investment framework for Ireland's social, economic, and cultural development. The framework is revised and updated to take account of changes that have occurred since it was published in 2018 and to build on the framework that is in place. It is a framework to guide public and private investment, to create and promote opportunities, and to protect and enhance the environment.

The first revision to the National Planning Framework (NPF) significantly strengthens the focus on renewable energy, particularly by incorporating regional renewable electricity capacity allocations. This revision has also introduced a clearer focus on climate transition and includes more explicit references to renewable energy.

The First Revision puts an increased emphasis on the importance of renewable energy development and the infrastructure needed to support this. **Chapter 10** acknowledges that the "accelerated delivery of additional renewable energy generation is...essential for Ireland to meet its climate targets."

A number of new or amended National Policy Objectives (NPOs) have been proposed in order to achieve this objective including the following:

NPO 70: to 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.

The Proposed Development is anticipated to have the capacity to generate 77.40 MW of renewable wind energy, contributes towards the national target of a zero carbon and climate resilient Ireland by 2050 by displacing greenhouse gas emitting fossil fuels and reducing Ireland's carbon footprint.

NPO 71: Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development.

The Proposed Development will contribute directly and in the long-term to the national electricity grid infrastructure by strengthening it through the addition of electrical transmission infrastructure and through renewable energy generation.

NPO 72: Support an all-island approach to the delivery of renewable electricity through interconnection of the transmission grid.

NPOs 71 and 72: provide increased support for the development, upgrading and interconnection of onshore grid infrastructure, compared with the previous NPF.

NPO 73: Support the co-location of renewable technologies with other supporting technologies and complementary land uses, including agriculture, amenity, forestry and opportunities to enhance biodiversity and promote heritage assets, at appropriate locations which are determined based upon the best available scientific evidence in line with EU and national legislative frameworks.

This is an increase in the level of support for co-location of renewables, compared with the previous NPF.

NPO 74 requires each Regional Assembly to plan, through their Regional Spatial and Economic Strategy, how and where to deliver the required capacity set out in Table 9.1 of the NPFby identifying capacity allocations for each Local Authority in its area. The Southern Region has 40 % of the total percentage of the national share. In turn, NPO 75 requires Local Authorities to plan, through their City and County Development Plans, for the delivery of the energy capacity target that they have been allocated.

Table 9.1 from the NPF First revision (extract below) sets out these regional renewable energy capacity allocations for wind and solar energy. These targets require each region to plan for sufficient wind and solar energy development so that Ireland achieves the overall national target of 9 GW onshore wind and 8 GW onshore solar by 2030.

Table 9.1 Regional Renewable Electricity Capacity Allocations from the NPF

Table 9.1 | Regional Renewable Electricity Capacity Allocations

Region	Energised capacity 2023 (MW)	Additional Renewable Power Capacity Allocations (MW)	Total % of National Share in 2030	Energised Capacity 2023 (MW)	Additional Renewable Power Capacity Allocations (MW)	Total % of National Share in 2030
	Onshore Win	d		Solar PV		
Eastern and Midlands	284	1,966	25%	306	3,294	45%
Northern and Western	1,761	1,389	35%	0.3	959	12%
Southern	2,622	978	40%	138	3,302	43%
Total	4,667	4,333		445	7,555	

This significant change in national policy represents a more active and prescriptive approach to land use planning for renewable energy development, giving increased emphasis to its importance.

A Shared Goal in the NPF is the transition to a Carbon Neutral and Climate Resilient Society. The Climate Action and Low Carbon Development (Amendment) Act was enacted in 2021 with a commitment to a legally binding target to reduce greenhouse gas emissions by 51 % and increase the share of electricity generated from renewable sources to 80 % over the decade (2021 – 2030), and to achieve net-zero emissions no later than 2050.

This objective will shape future development in line with the National Climate Action Plan 2024 and the National Adaptation Framework. New energy systems and transmission grids will be necessary for a more distributed, renewables-focused energy generation system,

Having regard to this evaluation, each Region must plan for sufficient wind and solar energy development in order to achieve the targeted regional renewable electricity capacity allocations outlined in Table 9.1 from the NPF, taking into account factors influencing delivery including attrition rates and changes to energised capacity levels, (in addition to current installed energised capacity), in order to facilitate, at a minimum, the 2030 national renewable electricity generation targets.

The Framework recognises and supports that in order to meet Regional Renewable Electricity Capacity Allocations and to ensure that the electricity can be both accepted on the national grid and brought to demand users, this will require the development and expansion of the electricity grid, at a national and local level, in a coordinated manner.

Each Regional Assembly has yet to prepare a Regional Renewable Electricity Strategy (RRES), whereby additional detail will be outlined on how the regional renewable electricity capacity allocations for the region can be best achieved in a consistent and sustainable manner, including the identification of specific targets for each of the constituent local authorities.

#### 4.5.3 Regional and County Policy

#### 4.5.3.1 Regional Spatial and Economic Strategy

## The Regional Spatial and Economic Strategy (RSES) for the Northern and Western Regional Assembly (NWRA)

The Regional Spatial and Economic Strategy (RSES) for the Northern and Western Regional Assembly (NWRA) was adopted in December 2019. The objective of the RSES is to support the implementation of the National Planning Framework – Ireland 2040 and the economic policies and objectives of the Government by providing a long-term planning and economic framework which shall be consistent with the NPF and the economic policies or objectives of the Government.

The RSES provides a development framework of the region that supports the implementation of the National Planning Framework (NPF) and the relevant economic policies and objectives of the Government. It provides a 12-year strategy for the period 2020 – 2032 to achieve the objectives and vision of the Regional Assembly.

Among the Regional Policy Objectives (RPOs) are RPO 4.17, 4.18 and 4.18 which state the following in relation to renewable energy:

**RPO 4.17:** To position the region to avail of the emerging global market in renewable energy by:

- Stimulating the development and deployment of the most advantageous renewable energy systems
- Supporting research and innovation
- Encouraging skills development and transferability

 Raising awareness and public understanding of renewable energy and encourage market opportunities for the renewable energy industry to promote the development and growth of renewable energy businesses

Encourage the development of the transmission and distribution grids to facilitate
the development of renewable energy projects and the effective utilisation of the
energy generated from renewable sources having regard to the future potential
of the region over the lifetime of the Strategy and beyond.

**RPO 4.18:** Support the development of secure, reliable and safe supplies of renewable energy, to maximise their value, maintain the inward investment, support indigenous industry and create jobs.

**RPO 4.19:** Support the appropriate development of offshore wind energy production through the adequate provision of land-based infrastructure and services, in line with national policy and in a manner that is compatible with environmental, ecological and landscape considerations.

The RSES recognises that the northwest region has a rich natural energy resource, declaring that the region is open to renewables energy ideas, and recognises the required transition from fossil fuels to the use of renewables. The strategy further notes that this can contribute to new employment, community sustainability and attract additional people to the region.

The RSES has been informed by an Environmental Report that has been prepared in accordance with the SEA Directive and the Planning and Development (Strategic Environmental Assessment) Regulations S.I. No. 436/2004 (as amended), accompanied by a Regional Flood Risk Appraisal Report. Section 8.3 of the document outlines how the electrical grid network in the region must develop to accommodate diverse renewable energy resources<sup>19</sup>.

#### 4.5.3.2 Compliance with Regional Policy

The RSES recognises and supports many opportunities for onshore wind as a major source of renewable energy. It states that opportunities for both commercial and

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<sup>&</sup>lt;sup>19</sup> Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly. https://www.nwra.ie/rses/

community wind energy projects should be harnessed, having regard to the requirements of DoHPLG Guidelines on Wind Energy. Wind Energy, with current and future developments technology, has an important role in delivering and clean electricity for Ireland. As a form of sustainable energy with an output potential of 77.40 MW of installed capacity at the Wind Farm Site, the Proposed Development will contribute significantly to renewable energy targets and the strategy supported in the RSES for the NWRA.

The Proposed Development is fully aligned with regional climate and renewable energy policy objectives, as it not only facilitates the integration of renewable energy into the electricity transmission grid but also safeguards strategic energy corridors from encroachment by other developments that could comprise the delivery of energy networks. By adhering to regional policy objectives, the Proposed Development ensures sustainable and timely delivery of renewable energy while supporting the region's long-term energy needs at local, regional and national scales.

In support of the CAP2024 objectives, the Proposed Development is anticipated to contribute to the de-carbonisation of the Irish electricity network by producing an anticipated 77.40 MW of renewable electricity, contributing to the Government's 80 % renewable electricity target by 2030 and helping achieve the CAP2024 target of 9 GW of onshore wind capacity by 2030, helping to reduce the current 4.2 GW shortfall<sup>20</sup>. This will help to mitigate climate change by reducing the emissions related to energy production and will help to decarbonise multiple sectors.

#### 4.5.4 Local Sustainable Development Policy

#### 4.5.4.1 Mayo County Development Plan 2022 – 2028

The Mayo County Development Plan 2022-2028 ("the CDP") was adopted on 29 June 2022. The CDP presents an extensive list of policies regarding development management within the County. The Mayo CDP 2022-2028 Vision of County Mayo states that:

To create a sustainable and competitive county that supports the health and wellbeing of the people of Mayo, providing an attractive destination, as a place in which to live, work, invest, do business and visit, offering high quality employment and

<sup>&</sup>lt;sup>20</sup> Statista (2024) Installed wind power capacity in Ireland 2008-2023 Published by Lucía Fernández, https://www.statista.com/statistics/421528/total-wind-power-in-ireland/ [Accessed 21/11/24]

educational opportunities within strong and vibrant sustainable communities, whilst ensuring a transition to a low carbon and climate resilient county that supports high environmental quality.'

The CDP states that: 'This plan provides for, and manages, the physical, economic, and social development of the County, in the interests of the overall common good, and in compliance with environmental legislation'.

The given policies from the CDP are given for ease of reference and are thought those most relevant to this type of development. Individual technical assessments included with the EIAR will also refer to CDP policies where relevant.

The key CDP policies considered to be relevant to the EIAR Development include: Energy Infrastructure

Chapter 11 of the Mayo CDP focuses on climate action and renewable energy for County Mayo. The plan refers to its objective to reduce the carbon output, energise Mayo through renewable means and mitigate the effects of climate change. The CDP recognises the potential that renewable energy sources can offer from within the County and included amongst these, is wind generation. A range of energy and renewable energy policies and objectives are identified in Chapter 11 of the CDP and included in these, relevant to the Proposed Development, are the following:

**Table 4.2**: Key Policies from The County Development Plan (CDP) Mayo 2022 – 2028 relevant to the Proposed Development type.

Objective/ Policy	Statement of Compliance
CAO 1: To support and advance the provision of	All Government policies and legislations will be
renewable energy resources and programmes in line	adhered to during the Proposed
with the Government's National Renewable Energy	Development's construction, operation and
Action Plan (NREAP), the Governments' Energy White	decommissioning phases.
Paper "Irelands Transition to a Low Carbon Energy	
Future" (2015-2030) and any other relevant policy	
adopted during the lifetime of this plan.	

#### **Objective/ Policy**

CAP 9: To support Ireland's renewable energy commitments outlined in national policy by facilitating the development and exploitation of all appropriate renewable energy sources at suitable locations within the county, where such development does not have a negative impact on the surrounding environment (including water quality), landscape, biodiversity or local amenities, so as to provide for further residential and enterprise development within the county.

#### **Statement of Compliance**

The Proposed Development meets the objectives set down in policy CAP 9, by providing renewable energy where there is a pressing need to meet the national 80% renewable electricity target by 2030 as set out in the Climate Action Plan 2023. The Wind Farm has excellent wind resources as evidenced by site investigations. It is clear from the findings of the EIAR and the NIS that the Proposed Development is a suitable location. Effects to the Environment are assessed throughout the EIAR. Chapter 9 Hydrology and Hydrogeology assesses water quality, the findings demonstrate the environment can accommodate the Proposed Development without giving rise to significant impacts to hydrology or hydrogeology, including water quality.

Biodiversity; This is fully assessed in **Chapter 6 Biodiversity** and **Chapter 7 Ornithology**. The findings demonstrate that the environment can accommodate the Proposed Development without giving rise to significant biodiversity impacts.

Local Amenities and Landscape; In **Chapter 12** of the EIAR the Landscape and Visual assessment concluded that the Proposed Development would not give rise to any significant landscape or visual amenity effects (including residential amenity). The EIAR L&V chapter also considered effects upon "views and prospects" included in the Mayo County Development Plan 2022-2028. The findings demonstrate that the landscape can accommodate the Proposed Development without giving rise to significant effects.

Further enterprise development; In Chapter 5

Population and Human Health the socio-

Objective/ Policy	Statement of Compliance
	economic impacts of the development are assessed. The Proposed Development has been assessed as having the potential to result in effects of a slight positive, long-term impact overall.
Renewable Energy Objectives	
REO 2: To examine options to ensure that community benefits are derived from renewable energy development in the County.	The Proposed Development at Tirawley, under the legal entity name Constant Energy Limited will have a community benefit fund.
REO 3: To encourage and facilitate, where possible, the production of energy from established and emerging renewable technologies.	The Proposed Development will produce energy from renewable wind energy generators.
REO 4: To support and implement the recording and monitoring of renewable energy potential in the county in partnership with other stakeholders including the Sustainable Energy Authority of Ireland (SEAI).	The Proposed Development will connect into the National Grid to export the energy produced.
REO 6: To ensure all renewable energy proposal comply with the provisions of the Mayo County Council Renewable Energy Strategy 2011-2022 (or as updated).	
REO 8: To encourage the development of wind energy, in accordance with Government policy, and having regard to the Landscape Appraisal of County Mayo and the Wind Energy Development Guidelines (2006) and Mayo Renewable Energy Strategy, or any revisions there of or future guidelines, and ensure consistency with the provisions of RPO 4.16 and RPO 5.2(b) of the RSES (2020-2032).	All Government and County policies, guidelines and legislations will be adhered to during the Proposed Development's construction, operation and decommissioning phases.  The Wind Farm Site was selected in line with the existing policies and guidelines.

#### **Objective/ Policy**

# REO 22: To promote the use of efficient energy storage systems and infrastructure that supports energy efficiency and renewable energy system optimisation, in accordance with proper planning and sustainable development.

#### **Statement of Compliance**

A second connection option considered in this EIAR is a 110 kV underground Interconnector cable between The Proposed Development (Tirawley Wind Farm) and a granted Hydrogen Plant known as the Killala Energy Hub, currently under consideration with Mayo Planning Authority (Planning Reference No. 2360266).

REO 23: To support and facilitate the achievement of the minimum renewable energy target of 600MW for County Mayo over the plan, and to review/revise this target to ensure consistency with any future renewable energy strategies for the Northern and Western Region

The Proposed Development will have an anticipated output of 77.40 MW which will contribute to the renewable energy target for County Mayo.

#### Renewable Energy Policies

REP 1: To support Ireland's renewable energy commitments outlined in national policy by facilitating the development and exploitation of a range of renewable energy sources at suitable locations within the county, where such development does not have a negative impact on the surrounding environment (including water quality), landscape, biodiversity or local amenities to ensure the long-term sustainable growth of the county.

The Proposed Developments contribution to this objective is outlined in objective CAP 9.

REP 3: To actively encourage and support the sustainable development, renewal and maintenance of energy generation infrastructure in order to maintain a secure energy supply, while protecting the landscape, archaeological and built heritage and having regard to the provisions of the Habitats Directive.

The Proposed Development supports this policy by contributing to renewable energy production. A full EIA has been undertaken on the Proposed Development to maximise positive benefits and minimise potential negative impacts on the environment, including built heritage while having regard to the Habitats Directive.

#### Biodiversity & Environmental Strategy

#### **Objective/ Policy**

## NEO 8: To maintain, protect and where possible enhance the natural heritage and biodiversity of bogs, fens and turloughs, where appropriate, in County Mayo.

#### **Statement of Compliance**

The Proposed Development is located on agricultural lands. This habitat can be partially restored using the peat spoil from any excavations onsite. The Proposed Development will not spread beyond the outlined Redline Boundary, to protect the surrounding habitats from degradation.

NEO 9: Recognise the importance, in terms of their natural heritage and biodiversity, of woodlands, tree lines, hedgerows, stonewalls, watercourses and associated riparian vegetation and the role they play in supporting bat populations and where possible developments will be encouraged to retain such features.

The Proposed Development is located at a distance from any ecologically important receptors in relation to bat populations.

NEO 11: To ensure that the impact of development within or adjacent to national designated sites, Natural Heritage Areas, Ramsar Sites and Nature Reserves likely to result in significant adverse effects on the designated site is assessed by requiring the submission of an Ecological Impact Assessment report (EcIA), Environmental Report (ER), an Environmental Impact Assessment Report (EIAR), if deemed necessary, and/or a Natura Impact Assessment (NIS), if deemed necessary, prepared by a suitably Mayo County Development Plan 2022-2028 qualified professional, which should accompany planning applications.

Buffer distances have been implemented in the design of the Proposed Site to ensure minimal/no effect on national designated sites, Natural Heritage Areas, Ramsar Sites and Nature Reserves. Further details can be found in **Chapter 14 Cultural Heritage**.

NEO 14: To protect and enhance the ecological network throughout the county to improve the ecological coherence of the Natura 2000 network in accordance with Article 10 of the Habitats Directive.

The Proposed Development includes a Biodiversity Enhancement and Management Plan (BEMP) in **Appendix 6.4** which provides methods of protection and enhancement of habitats within the Proposed Development.

Objective/ Policy	Statement of Compliance	
NEO 27: To ensure all development proposals are	The Proposed Development will comply with	
consistent with the Landscape Appraisal of County	provisions outlined in the Landscape Appraisal	
Mayo and the associated Landscape Sensitivity Matrix	of County Mayo and the associated Landscape	
and future editions thereof.	Sensitivity Matrix.	
NEO 29: Require a Landscape/Visual Impact	A Landscape and Visual Impact Assessment	
Assessment to accompany significant proposals,	was carried out as part of this EIAR, details of	
located within or adjacent to sensitive landscapes,	which can be found in <b>Chapter 12 Landscape</b>	
where appropriate.	and Visual Impact and Appendix 12.1	
	Landscape and Visual Impact Assessment	
	Booklet.	

#### 4.5.4.2 Mayo Renewable Energy Strategy

The Renewable Energy Strategy for County Mayo 2011 – 2020 was adopted by Mayo County Council on 9<sup>th</sup> May 2011. The Mayo Renewable Energy Strategy 2011 – 2020 vision statement outlines:

"The renewable energy development vision for County Mayo is to harness the energy and economic potential of County Mayo presented by renewable technologies in order to provide benefits for both local communities and the global environment. In doing so, the elements of the natural, cultural (architectural and archaeological) and landscape heritage that define Mayo for local people and visitors alike will be protected. It is recognised, however, that change is an integral part of cultural heritage and that in order for communities and businesses to thrive Mayo needs new developments. Renewable energy projects will, therefore, be developed in ways that protect the integrity of environmentally designated sites; maximise local and regional benefits; and minimise or avoid negative impacts on the environment and society".

The aim of the strategy is to develop the plan led approach to the location of renewable energy development at a more detailed level than that outlined in the Wind Energy Strategy (2008) and renewable energy policies and objectives of the Mayo CDP 2008-2014.

#### 4.5.4.3 Mayo RES Renewable Energy Potential Designated Areas

**Figure 4.2** shows the location of the Proposed Development Site on "Map 8 Renewable Energy Potential and Existing Infrastructure in County Mayo" of the Mayo RES.

The Proposed Development has a total of 18 no. turbines. Of the 18 no. turbines, 3 no. turbines are in a 'Tier 1 Preferred Large Windfarms' area, 10 no. turbines are within an area 'Open for Consideration' and 5 no. turbines are on a non-designated area. However, these 5 no. turbines are within 820 m of a designated area, as shown on **Figure 4.1**.

The areas of the Wind Farm Site that are located outside the designated areas are 'unclassified' and share the same characteristics as the portion within the classified lands. The RES states that applications for wind turbines in the 'Open for Consideration' areas are open to development, subject to conformance with all other requirements of the County Development Plan, including objectives relating to landscape protection and the protection of residential amenity. The rationale behind this is to minimise the impacts of large-scale developments on the environment of Co. Mayo, while maximising the potential for optimal and efficient renewable energy generation.

Section 6.4 of the Mayo RES makes provision for the Local Authority to consider all proposed renewable energy developments submitted through the planning system on a case-by-case basis, unless located on a Natura 2000 site.

Section 6.5, p52 of the Mayo RES 2011 - 2020 states the following:

"Notwithstanding the potential areas identified in this Strategy all proposed renewable developments will be assessed on the principles of proper planning and sustainable development, ensuring minimal adverse environmental impact, including flooding, and taking full account of the presence and requirement to protect all Natura 2000 sites and (proposed) Natural Heritage Sites. Projects will be subject to Habitats Directive Assessment where considered appropriate."

During the EIA design process outlined in **Chapter 3: Alternatives Considered**, the location of the turbines was influenced by inputs from the hydrologist, ecologist, geologist, archaeologist, landscape and visual specialist. These included proximity to heritage sites (cairns & passage tombs), visual effects to the surrounding area (Downpatrick Head), the proximity to dwellings, effects on local ecology (Annex 1 bogs) and areas prone to peat slippage.

A detailed environmental constraints assessment was undertaken in conjunction with civil design, which resulted in the most suitable area for siting 5 no. of the turbines outside the designated zone. The lands outside the designated zones which the turbines are proposed on, have similar characteristics to the lands within the designated zones, i.e. agricultural lands (grazing) and planted conifer forestry. The findings and conclusions of the EIAR clearly point to the Proposed Development not only being suitable as proposed but also being in line with the requirements of proper planning and sustainable development in that the site can clearly accommodate a development as proposed without significant adverse impact on the environment in the vicinity.

#### 4.5.4.4 Analysis of Land Designations for Renewable Energy Potential

The Wind Farm Site is situated across Tier 1, Tier 2 and 'unclassified lands' as outlined in the Mayo Renewable Energy Strategy 2011 – 2020 (RES). The RES wind designation zones were designed using multiple constraints. Planning considerations such as designated natural heritage areas, built heritage, scenic views/routes, cycle/walking route and populated areas and infrastructure constraints were identified. It's important to emphasize that the RES does not specifically restrict applications for wind turbines within the unclassified areas, but rather, they are assessed on their merits 'on the principles of proper planning and sustainable development'. It should also be noted that the Renewable Energy Strategy was due to be updated one year after the CDP came into effect, as of January 2024 the RES is yet to be updated.

The constraints used by Mayo County Council in developing the RES renewable energy potential areas were applied when assessing this Proposed Development and its environs. The Environmental Impact Assessment Report, Natura Impact Statement and all assessments, including hydrological, ecological, visual, and soils assessments demonstrate that the Proposed Development will not create significant adverse impacts on the receiving environment. The Proposed Development site has adequate wind speed and it is not located within a special protected area or SAC, or a Natura 2000 site. The rationale for the siting of the turbines has been outlined in **Chapter 3: Alternatives Considered**. The Proposed Development is fully compliant with National, Regional and Local Planning policy.

As set out in Section 6.5 of the RES, the Planning Authority will consider all proposed renewable energy developments submitted through the planning system and,

irrespective of the wind energy classifications identified within the Strategy, each will be assessed on the principles of proper planning and sustainable development.

The overall vision outlined in the RES is that of County Mayo harness the energy and economic potential of the county presented by renewable technologies while protecting the environment. It is therefore the conclusion that the Proposed Development will aid in realising the RES vision and contributing to the delivery of Ireland's climate targets under State and European obligations.

As the Proposed Development is in line with the relevant policy documents in particular the mitigation measures set out in the RES, it is considered that the Proposed Development is in compliance with the principles of proper planning and sustainable development, the principal development is acceptable and therefore it should be assessed on its merits by the An Bord Pleanála.

#### 4.5.4.5 Landscape Appraisal

The Council commissioned a Landscape Appraisal of the County.

The Landscape Appraisal uses a four-phase methodology to characterise the County's landscape:

- 1. Identification of Landscape Character Units (LCU) (refer to Table 4.2) through the mapping and integration of;
  - Physical units
  - Appearance
  - Characterisation

The resultant "Character Units" are then described in terms of their defining landscape characteristics. Boundary determinant factors are then provided for each boundary of the character unit, and finally, "Critical Landscape Factors" are identified that have a bearing on the relative sensitivities or robustness to development within the unit.

- 2. Determination of **Landscape Sensitivities** (refer to **Section 4.5.4.8**), through the classification of physical features such as landuse, topography and visual units based in CORINE.
- 3. Designation of 4 **Principal Policy Areas** (refer to **Table 4.4**) is then achieved by grouping the "Landscape Character Units" that have similarity of landscape types, which for Mayo have been identified as:
  - Montaine Coastal

- Coastal
- Upland moors/heath/ or bogland
- Drumlin/Pasture/Woodland
- 4. Policy Responses are then provided for each "Principal Policy Area", which recognises the inherent sensitivities and robustness of each area to development. In addition to landscape based policies a relative ranking of the 8 most common development types with landscape implications is provided. This is based on a weighting system that accounts for the flexibility of the various elements of each development type for each type of development and its inherent ability to influence the character of an area. The resultant tool is a Development Impact Landscape Sensitivity Matrix, that provides a general indication of the likelihood of success of planning applications for each development type in each policy area.

#### 4.5.4.6 Landscape Character Units

The Proposed Development is located across two LCUs – Area D North Coastal Plateaux and Area G North Mayo Drumlins, described below.

During the EIA process, photomontages were developed to show the visual impact of the Proposed Development on the Study Area. 35 no. viewpoints were identified. Section 12.4.2. of **Chapter 12 Landscape and Visual Impact Assessment** assessed each viewpoint in relation to the physical landscape effects that the Proposed Development may have on the surrounding landscape. Refer to **Table 4.3** below:

Table 4.3. Landscape Character Units critical landscape factors

Area D: the critical landscape factors include elevated coastal vistas, smooth terrain and low vegetation.

Elevated Coastal Vistas: The main concern for natural linear features such as coastlines and ridgelines is to avoid penetration by development that will interrupt and reduce the integrity of such elements.

To minimise the visual impact on the coastal vistas, the Vestas V105 turbine was chosen due to its compact size and minimal tip height.

Smooth Terrain: allows vistas over long distances against a planar surface without breaking up fore and middle ground. In such terrain, distances can appear shorter and development closer or larger. As a result development can have a disproportionate visual impact in such terrain, due to an inherent inability to be absorbed, physically or visually.

The turbine size and finish will allow for minimal visual disturbance on the landscape. The turbines appearance will be a matt non-reflective finish in a white, off-white or grey colour.

Low Vegetation: represented in this unit by moorland and bog type grasses has similar characteristics to smooth terrain in landscape terms, and the two are often interrelated due to soil attributes. Grassland vegetation is generally uniform in appearance, failing to break up vistas, and allowing long distance visibility. This inability to absorb development identifies low vegetation as a critical landscape factor.

The Wind Farm Site and surrounding consist environments mainly agricultural lands with areas of forestry. The forestry provides screening to the Proposed Development.

## Area G: the critical landscape factors include undulating topography, shelter vegetation, prominent ridge lines and localised lake vistas.

Undulating Topography: represented in this character unit by glacial drumlins has the ability to both shelter and absorbs the visual impact of development. Firstly, the physical shielding of a built form within the lee of hill where it does not break the skyline renders it visually unobtrusive and reflective of landscape scale. Secondly, the dynamic and complex nature of undulating country provides fore, middle, and distant ground to a vista that helps to provide a realistic scale and visual containment not available in open country.

The undulating topography and drumlins aid in screening the turbines across the landscape.

Shelter Vegetation: has a shielding and absorbing quality in landscape terms. It can provide a natural visual barrier and also adds to the complexity of a vista, breaking it up to provide scale and containment for built forms.

The vegetation provides a natural visual barrier to the Proposed Development.

Prominent Ridge Lines: These occur as either primary ridgelines (visible only against the sky from any prospect) or secondary ridgelines (visible at least from some prospects below a distant primary ridge line). In this area both primary and significant secondary ridgelines are located to the east as part of the Ox Mountains. Ridge lines perform the important roles of providing an area with its identity, acting as dominant landscape focal points, and defining the extent of visual catchments. As with other natural linear features such as shorelines, it is important that development does not interrupt the integrity of primary ridgelines. Due to the dominating influence of ridge lines, in instances where penetration does occur, development can appear in subordinate to the landscape in which it sits.

The ridgelines provide screening for the turbines while also breaking up the topography allowing for further screening of the turbines and blending with ridgelines in the background.

Localised Lake Vistas: This character unit envelops a large part of Lough Conn, around the shores of which, several major roads pass. Due to the low-lying nature of lakeland environments such as this, low prospect vistas are available from the roads of the Lough and its shores. The main concern for natural linear features such as lake-shores, coast lines, and ridge lines is to avoid penetration by development that will interrupt and reduce the integrity of such elements. Given the low viewing points around the Loughs, visual intrusion by development is likely to be enhanced.

The Proposed Development is located c. 15km north of Lough Conn. There is screening from vegetation and topography, with minimal visuals of the turbines.

#### 4.5.4.7 Landscape Sensitivities

The Proposed Development is located on land classed as 'Peat Bogs', with partial coverage on 'Agricultural lands with significant natural vegetation'. These designations are classed as sensitive. These areas have a distinctive, homogenous character, dominated by natural processes. Development in these areas has the potential to create impacts on the appearance and character of an extensive part of the landscape. Applications for development in these areas must demonstrate an awareness of these inherent limitations by having a very high standard of site selection, siting layout, selection of materials and finishes. **Chapter 3, Alternatives** demonstrates the site selection process and turbine siting. The turbines appearance will be a matt non-reflective finish in a white, off-white or grey colour. Applications in these areas may also be required to consider ecological, archaeological, water quality and noise factors insofar as it affects the preservation of the amenities of the area. These factors are considered in **Chapter 6, Biodiversity, Chapter 9, Hydrology and Hydrogeology, Chapter 11, Noise** and **Chapter 14, Cultural Heritage**.

Sensitive areas are prone to localised change over time where vegetative cover or agriculture management practices are the principal determinants. The sensitivity to change may arise from very different sources e.g. woodlands may be sensitive to development that requires tree felling while peat bogs may be sensitive to development that requires tree planting.

The Proposed Site is bordered by a scenic route from north Ballycastle, passing Downpatrick Head to Castlelacken. The coastline of County Mayo is entirely classed as a vulnerable area. The Proposed Development is located c. 1.1 km from the coastline at the closest point.

#### 4.5.4.8 Principle Policy Areas

The Proposed Development is located across two policy areas – Area 1 Montaine Coastal and Area 4 Drumlins and Lowlands.

Table 4.4: Area 1 Montaine Coastal Policies and Project Influence

Policy 1	Recognise the substantial residential development existing in some locations and the further pressures for residential development in this policy area.
Influence	Not applicable to wind farm development.
Policy 2	Facilitate appropriate tourism and amenity development in a progressive and clustered manner, where feasible, that reflects the scale, character and sensitivities of the landscape (Ref. to Housing Policy).
Influence	Not applicable to wind farm development.
Policy 3	Encourage development that will not have a disproportionate effect on the existing character of the coastal environment in terms of location, design, and visual prominence.
Influence	Larger turbines were assessed, however smaller turbines were chosen to reduce the impact on the landscape and reduce the prominence of the turbines within the area. The smaller chosen model will not be visible from Céide Fields, and all turbines were located in lowlands. The Wild Atlantic Way was considered for unobstructed views during the Landscape and Visual Impact Assessment.
Policy 4	Consider development that does not significantly interfere or detract from scenic coastal vistas, as identified in the Development Plan, when viewed from areas of the public realm.
Influence	Refer to Policy 3 influence above.

Policy 5	Encourage development that will not interrupt or penetrate distinct linear sections of primary ridge lines and coastlines when viewed from areas of the public realm.
Influence	Refer to Policy 3 influence above.
Policy 6	Preserve any areas that have not been subject to recent or prior development and have retained a dominantly undisturbed coastal character.
Influence	The Mayo CDP had a focus on protecting Annex 1 bog habitat. The Proposed Development is located in agricultural lands, commercial forestry and degraded cutover bog, and avoids Annex 1 bog.
Policy 7	Consider development on steep slopes, ensuring that it will not have a disproportionate or dominating visual impact on the surrounding environment as seen from areas of the public realm.
Influence	A Peat Slide Risk Assessment (PSRA) was conducted on areas considered for turbine locations. However, due to the peat slide risk of steep slopes and cultural heritage features, such as cairns, the Wind Farm Site was not sited on steep slopes.

Table 4.5: Area 4 Drumlins and Inland Lowlands Policies and Project influence

Policy 14	Encourage development that will not interrupt or penetrate distinct linear sections of primary ridge lines when viewed from areas of the public realm.
Influence	Policy 14 focuses on protecting the ridgelines. During the design phase of this windfarm, this was considered and influenced the turbine model, size and locations chosen. The siting of turbines on prominent ridgelines was reduced to avoid visual impacts. (See VP3 and VP5 of Chapter 12: Landscape and Visual Impact Assessment)
Policy 16	Preserve from development any areas that have not already been subject to development, which have retained a dominantly undisturbed upland/moorland character.

Influence	The Proposed Development is located on agricultural, commercial forestry and lowlands. Of the 18 no. turbines, only one turbine is located on degraded bog.
Policy 21	Recognise that these areas are made up of a variety of working landscapes and contain the vast proportion of the Counties population within principle towns and on rural holdings. These also incorporate all of the major national primary and regional roads, and railways.
Influence	Turbines are located in areas to avoid built up residential zones. A smaller turbine model was chosen following assessments, to avoid built up areas such as Killala, Ballycastle and such. There will be minimum impact on rural areas and roads during delivery of turbine components.
Policy 22	Continue to permit development that can utilise existing infrastructure, whilst taking account of absorption opportunities provided by the landscape and prevailing vegetation.
Influence	The LVIA photomontages show the turbines are screened by the landscape. The turbines will have a specific colour chosen to reduce the visual impact and conform with the existing landscape.
Policy 23	Encourage development that will not significantly interfere or detract from scenic lakeland vistas, as identified in the Development Plan, when viewed from areas of the public realm.
Influence	The Proposed Development is not located near a Lakeland vista and will not impact the scenic views from such.
Policy 24	Encourage development that will not result in detrimental impacts (through excessive bulk, scale or inappropriate siting) on the landscape at a local or micro level as viewed from areas of the public realm.
Influence	Refer to Policy 3 influence above.

#### 4.5.4.9 Development Impact – Landscape Sensitivity Matrix

The Landscape Sensitivity Matrix is a fusion of the Development Impact Potential Index and the Landscape Area Sensitivity Index, which it should be used in conjunction with. This can be found in Appendix 4.1 Landscape Appraisal for County Mayo on pages 64 – 67 within the current Mayo CDP (2022-2028). Windfarms are classed as having a high development impact on the Development Impact Potential Index, which accounts for: bulk or intensity, scale, design/appearance, location or route required, public benefit and relative landscape impact potential. Policy Area 1 on the Landscape Area Sensitivity index is classed as having a medium sensitivity, while Policy Area 4 is classed as having a low sensitivity. This index accounts for: bulk or intensity, scale, design/appearance, location or route, proportion over 10 % slope and prior development. When the results of the two indexes are combined, the Landscape Sensitivity Matrix is formed which classifies windfarms in Policy Area 1 as having an overall high potential to create adverse impacts on the existing landscape character. Windfarms developed in Policy Area 4 are classified as having a medium to high potential to create adverse impacts on the existing landscape character.

#### 4.5.4.10 Mayo Strategic Environmental Assessment

Minogue Environmental Consulting Ltd. in conjunction with JBA Ireland prepared a Strategic Environmental Assessment (SEA) Statement for Mayo County Council in August 2022. The SEA process was initiated with the drafting of the County Development Plan in both SEA Screening and Scoping stages. In brief, the SEA is a statement summarising how environmental considerations have been integrated into the plan or programme that is the County Development Plan.

#### 4.6 OTHER RELEVANT GUIDELINES

## 4.6.1 DoHPCLG Department of Housing, Planning, Community and Local Government Guidelines

In July 2017, the Department of Housing, Planning, Community and Local Government (DoHPCLG) published 'Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change' under Section 28 of the Planning and Development Act 2000. Planning authorities are obliged to have regard to guidelines issued pursuant to s.28 in the performance of their functions under the Planning and Development Acts 2000, as amended. These Interim Guidelines did not replace or amend the existing 2006 Wind Energy Guidelines (WEGs). It was intended that the subject matter of the Interim Guidelines would be included in amendments to

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the WEGs. It was envisaged that, after the adoption of amendments to the WEGs (which has not yet occurred) the Interim Guidelines would cease to have effect.

The guidelines state that it is a specific planning policy requirement under Section 28(1C) of the Act, that in making a development plan with policies or objectives that relate to wind energy developments that a Planning Authority must:

- 1. "Ensure that overall national policy on renewable energy as contained in documents such as the Government's White Paper on Energy Policy Ireland's Transition to a Low Carbon Future', as well as the 'National Renewable Energy Action Plan', the 'Strategy for Renewable Energy 'and the 'National Mitigation Plan', is acknowledged and documented in the relevant development plan or local area plan;
- 2. Indicate how the implementation of the relevant development plan or local area plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts); and
- 3. Demonstrate detailed compliance with item number (2) above in any proposal by them to introduce or vary a mandatory setback distance or distances for wind turbines from specified land uses or classes of land use into their development plan or local area plan. Such a proposal shall be subject to environmental assessment requirements, for example under the SEA and Habitats Directives. It shall also be a material consideration in SEA, when taking into account likely significant effects on climatic factors, in addition to other factors such as landscape and air, if a mandatory setback or variation to a mandatory setback proposed by a planning authority in a development plan or local area plan would create a significant limitation or constraint on renewable energy projects, including wind turbines, within the administrative area of the plan."

#### 4.6.1.1 Department Circular PL5 / 2017

On the 3<sup>rd</sup> of August 2017, the Department of Housing, Planning and Local Government 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 Wind Energy Development Guidelines 2006. The circular (PL05/2017) reconfirms that this continues to be the advice of the Department.

The Department circular also reaffirms the four key aspects of the preferred draft approach being developed to address the key aspects of the review of the 2006 Wind Energy guidelines as follows:

- The application of a more stringent noise limit, consistent with World Health Organisation 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.

The release of Circular Letter PL05/2017 and the Interim Guidelines coincide with the publication of Ireland's first statutory National Mitigation Plan.

#### 4.6.1.2 DoEHLG Wind Energy Guidelines (Draft revised) 2019

In December 2019, the then Department of Environment, Heritage and Local Government (DoEHLG) published a revised draft 'Wind Energy Development Guidelines for Planning Authorities' (the Guidelines) under Section 28 of the Planning and Development Act, 2000. The aim of these guidelines was to assist the proper planning of wind power projects in appropriate locations around Ireland. The Guidelines 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 provide for consistency of approach throughout the country in the identification of suitable locations for wind energy development. Each wind project has its own characteristics and defining features, and it is therefore impossible to write specifications for universal use. Guidelines should be applied practically and do not replace existing national energy, environmental and planning policy. These guidelines remain in draft.

#### **IWEA Best Practice Guidelines for the Irish Wind Energy Industry 2012**

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

### 4.6.1.3 IWEA Best Practice Principles in Community Engagement and Community Commitment 2013

Following on from the IWEA published Best Practice Guidelines in March 2012, the Association extended its guidance with the publication of this Best Practice in Community Engagement and Commitment. IWEA and its members support the provision of financial contributions by wind farm operators to local communities and have sought to formulate best practice principles for the provision of a community commitment. The document sets out IWEA's best practice principles for delivering extended benefits to local communities for wind farm developments of 5 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 these guidelines is to see that the views of local communities are taken into account at all stages of a development and that local communities can share in the benefits. Details of the community engagement and financial contributions undertaken by the developer are outlined in **Chapter 2: Development Description (Section 2.12)** of this document.

#### 4.6.2 National Landscape Strategy for Ireland 2015-2025

The National Landscape Strategy for Ireland sets out a roadmap. The objectives of the National Landscape Strategy are to:

• Implement the European Landscape Convention by integrating landscape into our approach to sustainable development.

- Establish and embed a public process of gathering, sharing and interpreting scientific, technical and cultural information in order to carry out evidence-based identification and description of the character, resources and processes of the landscape.
- Provide a policy framework, which will put in place measures at national, sectoral

   including agriculture, tourism, energy, transport and marine and local level,
   together with civil society, to protect, manage and properly plan through high
   quality design for the sustainable stewardship of our landscape.
- Ensure that we take advantage of opportunities to implement policies relating to landscape use that are complementary and mutually reinforcing and that conflicting policy objectives are avoided in as far as possible.

#### 4.6.3 Material Planning Considerations

#### 4.6.3.1 The National Interest and Strategic Importance

The Proposed Development will make a valuable contribution to tackling climate change and GHG reductions as part of the international (**Section 4.3**) and European (**Section 4.4**) efforts to combat climate change.

Ireland is facing significant challenges in efforts to meet renewable energy and emissions targets and is falling behind in the longer-term movement away from fossil fuels. Ireland has one of the highest rates of importing fuel in Europe with energy import dependency increasing to 80 % in 2021<sup>21</sup>. Energy demand in Ireland has been growing and is expected to continue to increase, especially electricity demand which is expected to grow by 37 % to 2031<sup>22</sup>. Increases to the cost of carbon, supply issues and potential political insecurity increases fossil fuel price volatility. Since the Russian invasion of Ukraine, energy prices in Ireland have increased significantly. The SEAI's Electricity Prices in Ireland Report; January to June 2022<sup>23</sup>, found on average residential electricity prices increased 10.4% in the 12 months prior to June 2022.

<sup>&</sup>lt;sup>21</sup> SEAI. (2022). ENERGY IN IRELAND. <a href="https://www.seai.ie/data-and-insights/seai-statistics/key-publications/energy-in-ireland/?gclid=EAlalQobChMI-LH\_o6r8\_QIV09\_tCh23YAykEAAYASAAEgJipvD\_BwE">https://www.seai.ie/data-and-insights/seai-statistics/key-publications/energy-in-ireland/?gclid=EAlalQobChMI-LH\_o6r8\_QIV09\_tCh23YAykEAAYASAAEgJipvD\_BwE</a> [Accessed 22/09/2025]

<sup>&</sup>lt;sup>22</sup>EirGrid. (2022). EirGrid's Generation Capacity Statement Predicts Challenging Outlook for Ireland <a href="https://www.eirgridgroup.com/newsroom/eirgrids-generation-capac/#:~:text=The%20GCS%2C%20in%20its%20median,relatively%20consistent%20across%20the%20decade">https://www.eirgridgroup.com/newsroom/eirgrids-generation-capac/#:~:text=The%20GCS%2C%20in%20its%20median,relatively%20consistent%20across%20the%20decade</a>. [Accessed 22/09/2025]

<sup>&</sup>lt;sup>23</sup> SEAI. (2022). https://www.seai.ie/publications/SEAIs-EPR-data-for-JAN-to-JUN-2022.pdf [Accessed 07/02/2024]

The Economic and Social Research Institute (ESRI)<sup>24</sup> report on Energy Poverty published in 2022, has also warned that as many as 43 % of households could now be in energy poverty.

The high rate of imported fossil fuel dependency, the increasing demand for electricity and current energy price volatility make it vital to introduce more domestic renewable energy generation plants, such as the Proposed Development, to provide reliable, secure and affordable energy supplies in Ireland. The Proposed Development could improve Irish energy security and reduce reliance on imported fossil fuels in line with the National Energy Security Framework (Section 4.5.1.6) and the REPowerEU Plan (Section 4.4.4).

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

#### 4.6.4 The Economic Importance of the Proposed Development

The Proposed Development would represent a strategically significant investment in the locality of County Mayo and the wider the Northern and Western region. The Proposed Development is aligned with national, regional and local planning goals and policies by supporting economic development (including local employment and rural economy support). Some examples are;

- Strengthening rural economies and communities, as outlined in a number of the NPF shared goals for Ireland (Section 4.5.1.1 and Section 4.5.2.1)
- Support of rural economy and initiatives in relation to renewable energy for sustaining employment opportunities in rural areas (RSES, RPO 4.83), which is outlined in Section 4.5.2.
- Benefiting the local community in providing funding that will be made available to the local community for the duration of the Renewable Electricity Support Scheme, as detailed in Section 4.5.1.8.
- Contributing to rural economic development in line with the County Development Plan and objectives, as outlined in **Section 4.5.4.1**.

<sup>&</sup>lt;sup>24</sup> ESRI. (2022). Energy poverty at highest recorded rate <a href="https://www.esri.ie/news/energy-poverty-at-highest-recorded-rate">https://www.esri.ie/news/energy-poverty-at-highest-recorded-rate</a> [Accessed 22/09/2025]

#### 4.6.5 The Proposed Development as Sustainable Development

Sustainable Development is development which meets the needs of the present without compromising the ability of future generations to meet their own needs, as outlined in the Brundtland Report<sup>25</sup>, it is still the overarching understanding of sustainable development today. The Proposed Development is an excellent example of sustainable development, and is aligned with national, regional and local policies and objectives, some examples are:

- The objectives in section 1 of the NPF, (**Section 4.5.2.1**) which sets out that "sustainability is at the heart of long-term planning and the National Planning Framework".
- The national objective of the "The National Climate Policy Position, of achieving transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050.
- The Mayo County Development Plan (CDP) 2021 2027 which sets out the overarching strategic framework for sustainable development in spatial, economic, social and environmental terms (Section 4.5.4.1).

A key challenge for the National Planning Framework has been to explore alternatives that can accommodate projected growth in the most optimal and sustainable manner that could achieve Ireland's economic, social and environmental requirements. The Proposed Development meets each of these three requirements as outlined in **Table 4.6**.

**Table 4.6:** How the Proposed Development Interacts with the economic, social and environmental requirements of sustainable development.

Economic Role	The Proposed Development would represent a strategically significant
	investment in the locality. The Proposed Development provides the
	opportunity to reinforce and grow the existing local renewable energy
	industry knowledge and skills base, while providing the stability and
	diversity to the rural economy to stimulate further development by
	attracting new business to the region due to the improved supply of
	electricity. The Proposed Development will have a positive economic

<sup>&</sup>lt;sup>25</sup> Our Common Purpose: Bruntland Report, 1987

	effect with several Irish firms commissioned to work on the design, environmental assessment and planning.
Social Role	The contribution of the Proposed Development to the de-carbonisation of the Irish electricity network will contribute positively to issues of strategic social importance. It will assist in mitigating climate change and improve air quality while enhancing energy security, including helping to stabilise and reduce energy costs. The Proposed Development will also create jobs, economic development and rural diversification.
Environmental Role	Overall, the EIAR sets out that the likely environmental effects arising from the Proposed Development will not be significant following the implementation of proposed mitigation measures. The findings demonstrate that the environment can accommodate the Proposed Development without giving rise to likely significant environmental effects in line with the Mayo County Development Plan objectives as well as regional, national and international policy. The NIS concludes, on the best available scientific evidence that it can be demonstrated objectively, that no elements of the Proposed Development will result in an adverse effect on the integrity of a European Site or on the Qualifying Interests/Special Conservation Interests of any relevant European site, either on their own or in-combination with other plans or projects, in light of their conservation objectives.  Over its' lifespan (35 years), the Proposed Development would displace an approximate 2,107,180 tonnes of CO <sub>2</sub> . This would help to mitigate climate change and the effects on the ecosystem globally.

#### 4.7 CONCLUSION

Throughout this chapter on Planning Policy, renewable energy has been identified as being required to play an essential role in mitigating climate change by transitioning

to a low carbon economy and society. By investing in renewable energy, Ireland can promote sustainable economic development using its own, secure, and clean energy. All planning applications have to be determined on their individual merits with due consideration given to the overall planning balance of a scheme. The pressing need to address climate change, the challenges to energy security giving rise to the adoption of Regulation (EU) 2022/2577, and the presumption of overriding public interest being given to renewable energy projects, further supports additional renewable energy projects, such as the Proposed Development.

The Proposed Development in Tirawley, Co. Mayo will provide an anticipated c. 77.40 MW of renewable, domestically produced wind energy. This additional renewable power generated will contribute to a reduction in greenhouse gas emissions from fossil fuels, improve regional/national energy security and help Ireland achieve our renewable electricity targets. The Proposed Development contributes to supplying the national demand for renewable energy, which in the context of the ongoing climate emergency and increasing demand is an urgent Irish national priority.

While renewable energy in Ireland has come a long way, there is still a shortfall in where the nation needs to be to achieve increasing targets. Ireland missed its 2020 renewable energy share (RES) target as part of RED I, achieving 13.5 % instead of the target 16 %. Ireland's overall RES target has now increased to 43.0 % in 2030 as part of RED III. There is a clear national mandate to accommodate significant onshore wind within the next decade with the Climate Action Plan 2024 setting a 9 GW target for installed wind energy capacity by 2030. In Dec 2023 this was 4.8 GW, leaving a shortfall of 4.2 GW to be achieved in the next 6 years.

Further, the National Planning Framework emphasises a move to a low-carbon economy, reducing Ireland's carbon footprint and integrating climate action into the planning system. The Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region supports opportunities for onshore wind as a major source of renew able energy with an important role in delivering value and clean electricity for Ireland. The Mayo County Development plan reinforces the national and regional energy policies.

While parts of the Proposed Development fall outside an area designated for wind farms, the furthest turbine located from a designated area is only c. 820m. The site

does not fall within areas which are protected, such as SACs, SPAs, NHAs and pNHAs. As discussed in **Section 4.5.3** above, Section 6.4 of the Mayo RES makes provision for the Local Authority to consider all proposed renewable energy developments submitted through the planning system on a case-by-case basis, unless located on a Natura 2000 site.

The Proposed Development process adopted by the applicant has represented a best practice approach to the design of a renewable energy scheme by minimising the potential impact through multiple design iterations and modifications to minimise the impact on the receiving environment, and ensuring compliance with the suite of planning policies and objectives of the Mayo County Development Plan. The layout of the Proposed Development presented in the Planning Application and EIAR represents the optimum fit with the technical and environmental parameters of this project.

Environmental Impacts have been considered within this EIAR and through the process of assessment, embedded mitigation, and additional proposed mitigation outlined in the EIAR, NIS, CEMP and Habitat Management Plan it has been shown that the Proposed Development can be constructed and operated without significant effects arising, demonstrating the acceptability of the proposal.

This chapter outlines how the Proposed Development is compliant with International, European and National policy on energy security, emissions reductions and renewable energy production. It has reviewed policy for the Northern and Western region and local policies of Mayo County Council and finds that the Proposed Development complies with key renewable energy and environmental policy objectives.

There is specific supporting international, national, regional, and local policy and/or guidance for commercial onshore wind energy development in Ireland. The County Mayo County Development Plan is considered supportive of the development of renewable energy technology, particularly in the context of reducing the carbon emissions of the country and meeting renewable energy production targets, and the 2011 – 2020 Renewable Energy Strategy for County Mayo categorization of the area as open to consideration for wind energy. The Landscape Appraisal of County Mayo uses the Landscape Sensitivity Matrix which classifies wind farms in the area as have a medium to high potential to create adverse impacts on the existing landscape

character. This has been addressed in further detail in **Chapter 12 Landscape and Visual Amenity**. The Proposed Development still strongly supports national policies and other local authority policies as outlined in **Section 4.5** and **4.6** of this chapter.