4. POLICY, PLANNING AND DEVELOPMENT CONTEXT

4.1 INTRODUCTION

This chapter considers the proposed project in terms of legislative context and in relation to international, strategic, national, regional and local planning policies and objectives, in order to ascertain whether it is consistent with the relevant legislation and with the proper planning and sustainable development of the area.

The nature and location of the proposed project is described fully in Chapter 2 (Description of the Proposed Project), and it will include 10 no. wind turbines and all associated infrastructure including turbine foundations, hardstanding areas, two borrow pits, access roads, on-site 110 kV substation, works along the turbine delivery route (TDR), grid connection options (GCO) One and Two, and other ancillary infrastructure. The proposed project lies within the functional area of Kilkenny County Council and is thus informed by the provisions of the Kilkenny City and County Development Plan (CDP) 2021-2027. The Planning Statement submitted with the application includes a full review of the relevant climate action and environmental considerations policies included in the CDP as there are currently no wind energy designations in effect for the county.

The relevant global, European, national and regional climate, energy and planning policies as set out in Section 4.5 of this chapter emphasise the need to generate renewable energy and the importance of moving towards decarbonising the economy. The proposed project will contribute towards meeting Ireland's governmental, national and regional goals and targets by generating more power from renewable resources. The 2009 EU Renewable Energy Directive (2009/28/ EC) set Ireland a legally binding target to meet 16% of our energy requirements from renewable sources by 2020. In 2018, the Directive was recast (2018/2001/EU) to move the legal framework to 2030 targets, setting a new binding target of at least 32% with a clause for a possible upwards revision by 2023. In 2023, the Directive was further amended to set a new binding renewable energy target of at least 42.5% at EU level, but aiming for 45%, emphasising a growing obligation to renewable energy sources.

A report by Climate Action Network Europe (CAN), published in 2025[1], which looked into 12 National Energy and Climate Plans (NECPs) reveals that most of them urgently need to align targets and benchmarks with coherent policies to at least reach the EU's climate and energy goals, including Ireland. A CAN article[2] on the report finds that, *"Ireland's NECP shows major infrastructure hurdles to achieve its energy benchmarks and insufficient action in agriculture, heavily reliant on voluntary farmer engagement rather than systemic transformations."*

It is now widely established that Ireland did not meet the 2020 renewable energy targets. A report issued by the Sustainable Energy Authority of Ireland (SEAI) entitled 'Renewable Energy in Ireland – 2020 Update' showed that Ireland was still heavily dependent on fossil fuels[3]. Out of the 27 EU member states, plus the UK, Ireland had made the second lowest progress towards hitting the targets, with only the Netherlands performing worse. Ireland will be subject to tariffs through the EU Emissions Trading System (ETS) until these targets are realised. More recently,

[1] Key Recommendations Briefing. Accessed on 1st May 2025.
[2] EU climate ambition: new analysis of National Energy and Climate Plans reveals major concerns - CAN Europe. Accessed on 1st May 2025.
[3] https://www.seai.ie/publications/2020-Renewable-Energy-in-Ireland-Report.pdf. Accessed on 1st May 2025.

a report published in 2024 by the SEAI titled 'Energy in Ireland[4]', states that *"Additional electricity demand must be outpaced by increased installed capacity for renewable generation, if we are to decarbonise Ireland's electricity system further, all else being equal. Electricity demand must be managed to ensure that Ireland stays within the confines of our carbon budgets, sectoral emission ceilings, and energy demand reduction targets."* The report also found 82.7% of primary energy came from fossil fuels in 2023 with only 14.1% of Ireland's primary energy requirement in 2023 sourced from renewables.

The Irish Government published the Climate Action Plan 2024 (CAP24) on the 20th of December 2023 which sets ambitious actions to ensure our 2030 targets can be achieved. This in the context of substantial and continuing failure by Ireland in meeting climate targets to date. CAP24 recognises that Ireland must significantly increase levels of renewable energy in the country, and sets out the roadmap to deliver on Ireland's climate ambition which aligns with the legally binding economy-wide carbon budgets and sectoral ceilings that were agreed by Government in July 2022. CAP24 aims to build on the progress made under CAP23 which stated "transformational policies, measures and actions, and societal change are required to increase the deployment of renewable energy generation, strengthen the grid, and meet the demand for flexibility in response to the challenge" by delivering policies, measures and actions that will support the achievement of our carbon budgets, sectoral emissions ceilings, and 2030 and 2050 climate targets.

The Climate Action Plan 2025 (CAP25), published on the 15th of April 2025, marks the fourth annual update to Ireland's Climate Action Plan. Building on CAP23 and CAP24, CAP25 aims to expedite the deployment of onshore wind, targeting of 9 GW by 2030 to achieve an overall target of 80% share in renewable electricity by 2030. The plan emphasizes the necessity for rapid and substantial reductions in greenhouse gas emissions to meet the 2015 Paris Agreement and the UN's Sustainable Development Goals. Additionally, it highlights the importance of the revised National Planning Framework (NPF), which supports the development of electricity grid infrastructure by establishing regional renewable electricity capacity targets for 2030. CAP25 recognises that Ireland must significantly increase levels of renewable energy in the country and sets out the roadmap to deliver on Ireland's climate ambition which aligns with the legally binding economy-wide carbon budgets and sectoral ceilings that were agreed by Government in July 2022. The latest EPA projections are that there will be an 11% reduction in GHG emissions by 2030 compared to the 2018 level under the WEM scenario, and a 29% reduction under the WAM scenario. Both these predictions fall considerably short of the actual target which is a reduction of 51%. CAP25 aims to build on the progress made under CAP24 which stated "transformational policies, measures and actions, and societal change are required to increase the deployment of renewable energy generation, strengthen the grid, and meet the demand for flexibility in response to the challenge" by delivering policies, measures and actions that will support the achievement of our carbon budgets, sectoral emissions ceilings, and 2030 and 2050 climate targets.

[4] energy-in-ireland-2024.pdf. Accessed on 1st May 2025.

4.2 Statement of Authority

This chapter has been prepared having regard to relevant national and regional planning and environmental policy frameworks, including the National Planning Framework (NPF), the Regional Spatial and Economic Strategy (RSES) for the Southern Region, and applicable legislative instruments such as the Climate Action and Low Carbon Development Acts. It draws upon current government strategies, including the Programme for Government 2025, the Climate Action Plans (CAP24 and CAP25), and the European Green Deal and Fit for 55 legislative package. It is based on the most up-to-date policy documents at the time of preparation of this chapter. The chapter has been compiled by Saoirse Burke, Graduate Planner (BSc in Human Geography and Urban and Regional) and Eirene Varghese, Planner (Bachelors in Architecture, and Masters in Regional and Urban Planning) with over 4 years of experience in environmental planning, renewable energy policy, and statutory compliance.

4.3 Planning Legislation

The proposed project includes the provision of a wind farm, turbine delivery route, and grid connection options.

The 7th Schedule of the Planning and Development Act 2000 (as amended) sets out classes of development which, following consultation with An Coimisiún Pleanála, may be considered to constitute Strategic Infrastructure Development (SID) under Section 37A of that Act. Class 1 of the 7th Schedule includes the following:

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

The proposed wind farm will consist of 10 no. turbines and have an output of above 50 Megawatts and as such constitutes a Strategic Infrastructure Development (SID). Consultations were held with An Coimisiún Pleanála under Section 37B of the Planning and Development Act 2000 (as amended). An Coimisiún Pleanála has confirmed that the proposed project falls within the scope of paragraphs 37A(2)(a), (b) and (c) of the Act. Accordingly, An Coimisiún Pleanála have confirmed that the proposed wind farm would be strategic infrastructure within the meaning of Section 37A of the Planning and Development Act, 2000 (as amended), and that any application for permission must therefore be made directly to An Coimisiún Pleanála. A copy of this correspondence is included in Appendix 1-3 of this EIAR (Case Ref An Coimisiún Pleanála-320900-24).

Under the strategic infrastructure provisions of the Planning and Development Act 2000 (as amended) any person intending to carry out development comprising or for the purposes of electricity transmission must apply to An Coimisiún Pleanála for approval pursuant to section 182A (1).

Section 182A (9) of the Planning and Development Act 2000 (as amended) provide as follows:

> *… 'transmission', in relation to electricity, shall be construed in accordance with section 2(1) of the Electricity Regulation Act 1999 but, for the purposes of this section, the foregoing expression, in relation to electricity, shall also be construed as meaning the transport of electricity by means of—*
>
> *a) a high voltage line where the voltage would be 110 kilovolts or more, or*
> *b) an interconnector, whether ownership of the interconnector will be vested in the undertaker or not.*

"Transmission" is defined in subsection 2(1) of the Electricity Regulation Act 1999 as follows:

> *"transmission", subject to section 2A, in relation to electricity, means the transport of electricity by means of a transmission system, that is to say, a system which consists, wholly or mainly, of high voltage lines and electric plant and which is used for conveying electricity from a generating station to a substation, from one generating station to another, from one substation to another or to or from any interconnector or to final customers but shall not include any such lines which An Coimisiún Pleanála may, from time to time, with the approval of the Commission, specify as being part of the distribution system but shall include any interconnector owned by An Coimisiún Pleanála."*

The proposed grid connection options (GCO One and Two) comprise infrastructure with a capacity of 110 kV. As such, it is considered 'transmission' as per the above definitions. For that reason, it is understood that the proposed grid connection will be subject to an application to An Coimisiún Pleanála for approval under Section 182A.

The proposed grid connection options will consist of:

- **GCO One: Grid connection to the consented Castlebanny Wind Farm substation:**
    - Circa 12 km long 110 kV underground cable grid connection to the consented Castlebanny Wind Farm substation consisting of 6 No. ducts in an excavated trench to accommodate 3 No. power cables, 1 No. fibre communications cable , 1 No. spare fibre communications cable and 1 No. earth continuity duct where required, Joint Bays, Communications Chambers, and Earthing Link Boxes.
    - 1 No. Temporary Construction Compound.
    - 1 No. Temporary Deposition Area.
    - All related site work, horizontal directional drilling, drainage and ancillary works.
- **GCO Two: Proposed loop-in grid connection to existing Great Island-Kilkenny 110 kV overhead line:**
    - Removal of an existing 110 kV pole set on the Great Island-Kilkenny overhead line.
    - 2 No. New 110 kV Overhead Line Cable Interface Masts.
    - Two 110 kV underground cable circuits, comprising approximately 4 km of cabling (two circuits of 2 km each), will be installed from the line–cable interface mast to the proposed Ballyfasy 110 kV substation. Each Circuit will consist of:
        - 6 No. ducts in an excavated trench to accommodate 3 No. power cables, 1 No. fibre communications cable , 1 No. spare fibre communications cable and 1 No. earth continuity duct where required, Joint Bays, Communications Chambers, and Earthing Link Boxes.
    - An access road will be provided to facilitate permanent access to the underground cable route between the line - cable interface mast and the onsite substation.
    - All related site work, horizontal directional drilling, drainage and ancillary works.

Strategic Infrastructure Development Consultations were held with An Coimisiún Pleanála under Section 182E of the Planning and Development Act 2000 (as amended). An Coimisiún Pleanála confirmed that the proposed grid connection options (GCO One and Two) fall within the scope of section 182A of the Act. Accordingly, An Coimisiún Pleanála have confirmed that

the proposed grid connection options (GCO One and Two) would be strategic infrastructure within the meaning of Section 182A of the Planning and Development Act, 2000 (as amended), and that any application for approval must therefore be made directly to An Coimisiún Pleanála under Section 182A(1) of the Act. A copy of this correspondence is included in Appendix 1-3 of this EIAR (Case Ref An Coimisiún Pleanála -321814-25).

4.4 Planning and Development Policy Context

When considering wind as an energy source, it is important to place the development in an international, national, and local policy context from the perspective of environment, energy, and planning. This section outlines legislative mechanisms and requirements from a global to local level, which have been formulated to support the generation of energy from renewable sources and reduce the dependency on fossil fuels and increase in national security.

The Irish planning policy system is set within a hierarchical structure. National policy is informed by EU Directives, Planning Legislation, Ministerial Guidelines. Government Policy and Capital programmes.

4.4.1 International and European Policy and Legislation

This section sets out policy context under a series of sub-headings as follows and covers international climate and energy policy.

4.4.1.1 1992 United Nations Framework Convention on Climate Change

The United Nations Framework Convention on Climate Change (UNFCCC) is an international environmental treaty negotiated at the United Nations Conference on Environment and Development (UNCED), in Rio de Janeiro in 1992. Fifty countries ratified an international treaty, 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 set 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[5].

4.4.1.2 Kyoto Protocol Targets

The Kyoto Protocol is an international treaty which extends the 1992 United Nations Framework Convention. The Kyoto Protocol came into effect in 2005, as a result of which, emissions reduction targets agreed by developed countries, including Ireland, are now binding. Under the Kyoto Protocol, the EU agreed to achieve a significant reduction in total greenhouse gas emissions of 8% below 1990 levels in the period 2008 to 2012. Ireland's contribution to the EU commitment for the period 2008 – 2012 was to limit its greenhouse gas emissions to no more than 13% above 1990 levels.

[5] https://ec.europa.eu/knowledge4policy/organisation/unfccc-united-nations-framework-convention-climate-change_en. Accessed on 1st May 2025.

4.4.1.3 EU Energy Roadmap 2050[6]

The Energy Roadmap 2050, published by the European Commission in December 2011, outlined the EU's long-term strategy for achieving a competitive, secure, and sustainable energy system while meeting its climate objective of reducing greenhouse gas emissions by 80–95% by 2050 compared to 1990 levels. Recognizing that the energy infrastructure and systems of 2050 were already being shaped by decisions made in the early 2010s, the roadmap emphasized the urgency of developing post-2020 strategies to guide investment and policy.

Building on existing EU energy and climate policies, particularly the Energy 2020 strategy, which was expected to deliver around a 40% emissions reduction by 2050. In July 2025, the European Commission proposed a new amendment to the Climate Law to set a binding 2040 target of 90% net emissions reduction relative to 1990 levels[7].

It explored five scenarios based on different energy mixes, ranging from high renewables to diversified supply, and concluded that decarbonisation was technically and economically feasible under all scenarios, provided energy efficiency was prioritized and investments were made early.

The roadmap projected a growing role for renewable energy, which could account for over 55% of gross final energy consumption and up to 97% of electricity generation by 2050. The revised Renewable Energy Directive, adopted in 2023, sets EU's binding target for the share of renewable energy in the energy mix by 2030 to a minimum of 42.5%.

It stressed the importance of energy efficiency, particularly in buildings, transport, and appliances, and called for modernized infrastructure, including smart grids and storage solutions. It also urged greater coordination among Member States, convergence in support schemes, and the phasing out of subsidies for mature technologies once they became competitive.

The roadmap warned that delayed investments would lead to higher costs and greater disruption in the long term. It emphasized the need for clear policy signals to guide investors, reduce uncertainty, and avoid lock-in effects from outdated infrastructure. The Commission called for the development of a 2030 policy framework to provide milestones and ensure continuity in the transition toward a low-carbon energy system.

4.4.1.4 Doha Amendment to the Kyoto Protocol

In Doha, Qatar, on 8th 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 1st January 2013 to 31st 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

[6] LexUriServ.do.

[7] 2040 climate target - Climate Action - European Commission.

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 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.

4.4.1.5 Europe 2030 Climate and Energy Framework

EU leaders agreed in October 2014 on new climate and energy objectives for 2030 following a proposal put forward by the European Commission. The 2030 framework aims to make the EU's economy and energy system more competitive, secure and sustainable.

A centrepiece of the 2030 framework is the binding domestic target to reduce greenhouse gas emissions by 40% below 1990 levels by 2030. This will put the EU on the most cost-effective path towards its agreed objective of an 80-95% reduction by 2050. EU leaders also agreed on raising the share of renewable energy to at least 27%.

As of June 2018, the EU has increased its target of 27% of energy from renewable sources by 2030 to 32% which also includes a clause to allow for a further increase in the target by 2023. In 2023, a renewed target was set via the amended Renewable Energy Directive to 42.5% of energy from renewables but aiming for 45%. This amended target is a clear indication that increased renewable energy remains at the forefront of both EU and national energy policy historically and into the future.

An update to this framework was adopted in July 2021 with a view to 'make the EU's climate, energy, transport and taxation policies fit for reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels.' This was done to enable the EU to move towards a 'climate-neutral' economy.

4.4.1.6 The Paris Agreement 2015

This is an agreement within the United Nations Framework Convention on Climate Change (UNFCCC) dealing with greenhouse gas emissions mitigation, adaptation and finance, starting in the year 2020, which aims to keep the global average temperature rise this century to below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius.

In 2016, the threshold for entry into the agreement was adopted and the agreement came into force on the in November 2016. Ireland is legally bound by Article 7 of the United Nations COP21 Paris Agreement, signed in December 2015, to prepare and submit periodic updates on its national adaptation and mitigation plans in the global effort to keep global warming below 1.5 °C.

The Conference of Parties, more commonly known as COP, is held annually to agree policies for limiting global temperature rises and policies for adapting to impacts associated with climate change.

In 2021, the following agreements were reached by participating parties under COP26:

- Recognition that impacts from climate change will be lower at a temperature increase of 1.5 °C when compared with an increase of 2 °C;
- A request for participating countries to provide stronger national action plans for the year 2022 instead of the original agreed timeline of 2025;
- Agreement for participating nations to phase-down coal power and phase-out inefficient fossil fuel subsidies;
- A reaffirmed commitment by all parties to deliver financial aid to developing countries with a request for this aid to be doubled;
- An agreement on issues contained within the "Paris Rulebook", pertaining to operational details for the practical implementation of the Paris Agreement;
- An acknowledgment that the impacts of climate change are increasing with developing nations especially affected;
- Agreement to strengthen the Santiago Network for the connection of at-risk countries for the provision of assistance, knowledge and resources.

COP27 was held in November 2022, where it was agreed for the first time to set up a loss and damage fund for the most vulnerable countries.

COP28 introduced the first global 'stocktake' which is a process for countries and stakeholders to see where they're collectively making progress towards meeting the goals of the Paris Climate Change Agreement and where they're not. The first global stocktake affirmed that we are not on track to limit global warming to 1.5 degrees Celsius and the window for meaningful change is quickly closing due to slow progress in reducing greenhouse gas emissions, strengthening climate resilience, and providing financial and technological support to vulnerable nations. Countries decided to accelerate action by 2030, including a call for governments to transition from fossil fuels to renewables like wind and solar power.

More recently, COP29 was held in November 2024 and outlines actions and ambitions in the energy sector such as,

- Launch of the COP29 Global Energy Storage and Grids Pledge. The pledge commits signatories to commit to a collective goal of deploying 1,500 GW of energy storage globally by 2030.
- Launch of the COP29 Green Energy Pledge: Green Energy Zones and Corridors. The pledge focuses on promoting connecting green energy zones and corridors to the communities most in need by developing larger intraregional and interregional interconnected power grids.
- Call to Action for Energy Transition. As an outcome of a series of dialogues in 2024 to discuss the level of ambition and action required to achieve just and equitable transitions, the COP29 Presidency, in partnership with the International Energy Agency (IEA), shared five key opportunities for COP29 to demonstrate positive progress on energy goals identified at COP28.
- Global Renewables Alliance (GRA) Call to Action at COP29. GRA called on governments to address critical trade barriers that limit the expansion of renewable energy markets and challenge meeting the goal of tripling renewable energy capacity by 2030.

4.4.1.7 European Green Deal 2019

The European Green Deal 2019 resets the European Commission's commitment to tackling climate and environmental-related challenges. It is a new growth strategy that aims to

transform the EU into a fair and prosperous society, with a modern, resource-efficient and competitive economy where there are no net emissions of greenhouse gases in 2050 and where economic growth is decoupled from resource use. The various elements of the deal are indicated in Figure 4-1.

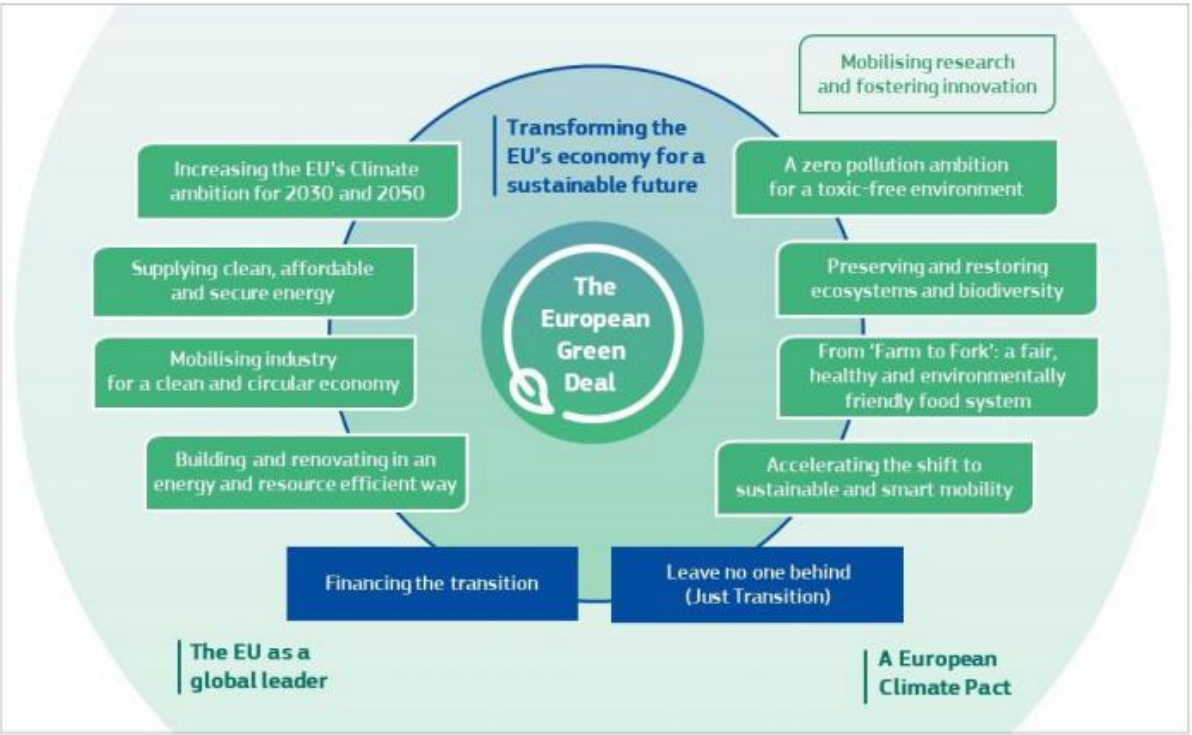

Figure 4-1: Elements of the Green Deal[8]

First climate action initiatives under the Green Deal include:

- European Climate Law to enshrine the 2050 climate-neutrality objective into EU law;
- European Climate Pact to engage citizens and all parts of society in climate action.

Based on a comprehensive impact assessment, analysis of the national energy and climate plans, and considering stakeholder contributions received to the public consultation, the Commission proposed a new EU ambition to reduce greenhouse gas emissions by 2030.

In July 2021, the European Commission launched the first tranche of its 'Fit for 55' measures that will support Europe's climate policy framework and put the EU on track for a 55% reduction in carbon emissions by 2030, and net-zero emissions by 2050. The interconnected proposals cover areas of climate, land use, energy, transport and taxation to bring them into line with the targets agreed in the European Climate Law. The package is comprised of thirteen proposals; eight of them are revisions to existing laws and five are new proposals:

Revisions:

[8] https://ec.europa.eu/info/sites/info/files/european-green-deal-communication_en.pdf.

- Revision to the EU Emission Trading Scheme, to lower the overall emissions cap per economic sector, phase out free emission allowances for aviation, and include shipping for the first time;
- Revision to the Effort Sharing Regulation, assigning stronger reduction targets for each Member State in building, road, domestic maritime transport, agriculture, waste and small industry sectors;
- Revision to the Regulation on Land Use, Land Use Change and Forestry, setting an overall EU target for carbon removals by natural sinks and setting national targets;
- Amendment of the Renewable Energy Directive, setting a new 2030 target of 40% (up from 32%) energy use from renewables by 2030 and strengthening bioenergy sustainability criteria;
- Amendment of the Energy Efficiency Directive setting a more ambitious binding annual target at EU level, raised from 32.5% to 36%;
- Amendment of the regulation setting CO2 emission standards for cars and vans requiring average emissions of new cars to come down by 55% from 2021 to 2030 and net-zero by 2035;
- Revision to the Alternative Fuels Infrastructure Directive to require aircraft and ships have access to clean energy supply in major ports and airports; and
- Revision of the Energy Taxation Directive to align taxation of energy products with climate policies and promote clean technologies.
- Revision of the Energy Performance of Buildings Directive aiming to achieve a fully decarbonised building stock by 2050.
- The new Climate, Energy and Environmental State Aid Guidelines replaced the outgoing Environmental Protection and Energy Guidelines (EEAG).

The Fit for 55 package, designed to cut EU greenhouse gas emissions by 55% by 2030, has been fully adopted[9]. All major proposals have passed through the legislative process and are now in implementation.

New initiatives:

- An EU Forest Strategy to improve quality, quantity and resilience of EU forests, ensure sustainable use of biomass, and plant three billion trees by 2030;
- The Carbon Border Adjustment Mechanism to place a carbon price on imports and prevent EU companies being undercut by energy-intensive competitors;
- A Social Climate Fund to help citizens finance investment in energy efficiency, clean mobility and renewable energy;
- The ReFuelEU Aviation Initiative to oblige fuel suppliers to blend more sustainable aviation fuels in jet fuel, including e-fuels; and
- The FuelEU Maritime Initiative to stimulate uptake of sustainable maritime fuels and zero-emission technologies.

Further proposals and amendments are expected, including changes to the Corporate Sustainability Reporting Directive (CSRD).

[9] Fit for 55: Delivering on the proposals - European Commission.

4.4.1.8 REPowerEU Plan & Council Regulation (EU) 2022/2577

A REPowerEU Plan was published by the European Commission in 2022 with the purpose of saving energy, producing clean energy and diversifying the supply of energy. The plan was produced in response to Ukraine war to reduce Europe's dependence on Russian fossil fuels. The Plan contains strategies and measures to phase out the EU's dependency on Russian fossil fuels by the end of the decade by building on the implementation of the European Green Deal and the EU's "Fit for 55" proposals (seeking to cut emissions by at least 55% by 2030). The Plan focuses on diversifying energy sources, accelerating a transition from fossil fuels to clean energy, saving energy, smart investment and reinforcing preparedness.

In support of this plan, Council Regulation (EU) 2022/2577 was adopted on the 22nd of December 2022 to provide a framework to accelerate the deployment of renewable energy.

This regulation was adopted as a temporary measure for the *"fast deployment of renewable energy sources" to "help mitigate the effects of the current energy crises"*.

One significant measure introduced by the Regulation was the *"introduction of a rebuttable presumption that renewable energy projects are of overriding public interest and serving public health and safety for the purposes of the relevant Union environmental legislation, except where there is clear evidence that those projects have major adverse effects on the environment which cannot be mitigated or compensated for"*.

This regulation indicated the international support for the proposed project as it contributed to the much-needed shift away from fossil fuels to clean energy through the production of clean energy, thereby reducing GHG emissions from the electricity sector and highlights the level of urgency required in the deployment of renewable energy projects. The temporary regulation was valid until June 2024, with a partial extension of validity until June 2025 under Regulation (EU) 2024/223[10].

4.4.1.9 Renewable Energy Directive 2009/28/EC 2018/2001/EU & 2023/2413/EU

The European Union has been a global leader in climate action, with its policy framework evolving to meet increasingly ambitious environmental goals. The European Green Deal (2019) serves as the EU's roadmap to transform its economy and society for sustainability, aiming for net-zero greenhouse gas emissions by 2050.

Central to these efforts is the EU Climate Law (2021), which makes the 2050 climate neutrality goal legally binding for the EU and establishes the 2030 emissions reduction target in law.

To operationalize the Green Deal's goals, the Fit for 55 package was introduced in 2021. This legislative framework targets a 55% reduction in EU greenhouse gas emissions by 2030 (compared to 1990 levels).

The Fit for 55 package included a Commission proposal[11] to revise the Renewable Energy Directive (EU) 2018/200, with some of the key adopted provisions highlighted below:

- **Increased ambition for renewable energy**

[10] Prolongation of emergency regulations on security of supply and energy prices: Council adopts measures.

[11] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52021PC0557.

RED II[12] had set a binding overall Union target to reach a share of at least 32% of energy from renewable sources in the Union's gross final consumption of energy by 2030. The text that has been adopted by the European Parliament and endorsed by COREPER increases this target to 42.5 %.

Additionally, the RED III Directive obliges EU Member States to "*collectively endeavour to increase the share of energy from renewable sources in the Union's gross final consumption of energy in 2030 to 45 %*"[13]

The associated recital (Recital 5) included in the final agreed text provides useful context:

"The REPowerEU Plan set out in the Commission communication of 18 May 2022 (the 'REPowerEU Plan') aims to make the Union independent from Russian fossil fuels well before 2030. That communication provides for the front-loading of wind and solar energy, increasing the average deployment rate of such energy as well as for additional renewable energy capacity by 2030 to accommodate the higher production of renewable fuels of non-biological origin….. In that context, ***it is appropriate to increase the overall Union renewable energy target to 42,5% in order to significantly accelerate the current pace of deployment of renewable energy, thereby accelerating the phase-out of the Union's dependence on Russian fossil fuels*** *by increasing the availability of affordable, secure and sustainable energy in the Union.* ***Beyond that mandatory level, Member States should endeavour to collectively achieve an overall Union renewable energy target of 45% in line with the REPowerEU Plan.****"*[14]

This indicates a significant increase in the mandatory targets for renewable energy in the EU, aiming for a more sustainable and independent energy system, with signals of further increasing ambitions through the 45% stretch target. This increased ambition for renewable energy at an EU level will be addressed in all future iterations of the national Climate Action Plan.

- **Measures to accelerate the pace of deployment of renewable energy projects**

  The RED III directive also includes specific observations and measures related to the accelerated deployment of renewable energy, storage and grid infrastructure projects across EU member states.

  Ireland has transposed some of the REDIII provisions into Irish legislation. As such, the Directive is highly relevant for three reasons:

  - Firstly, it envisages and requires a step-change in terms of the immediacy and ambition for renewable energy development across the Member States, without which the Unions climate neutrality objective simply cannot be achieved.
  - Secondly, it identifies the social and environmental benefits of renewable energy development as noted in Recital 2 "By reducing those greenhouse gas emissions, renewable energy can also contribute to tackling challenges

[12] https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018L2001.

[13] Article 3, paragraph 1.

[14] Emphasis added throughout document unless otherwise indicated.

related to the environment, such as the loss of biodiversity, and to reducing pollution" and which will help to achieve the aim to "protect, restore and improve the state of the environment by, inter alia, halting and reversing biodiversity loss" while bringing "broad socioeconomic benefits, creating new jobs and fostering local industries"

- Thirdly, and significantly the Directive identifies the imperative necessity for the designation of suitable sites by Member States for the development of renewable energy. While the Directive does not displace the designations County Development Plan, that imperative strongly supports the submission that the Commission can and should grant permission if it is satisfied that the proposed Wind Farm accords with proper planning and sustainable development.

RED III also establishes a rebuttable presumption that renewable energy projects are of overriding public interest and public health importance, when balancing legal interests in the individual case. This means that renewable energy developments, such as the proposed Ballyfasy Wind Farm, must be prioritised and assessed with urgency and consistency in line with Ireland's binding EU obligations to achieve a 42.5% share of renewables by 2030. The transposition of RED III reinforces the legal and policy imperative to support projects that contribute to climate neutrality, energy security, and environmental sustainability.

4.4.1.10 Conclusion

While it doesn't impose binding limits, the UN Framework Convention on Climate Change (UNFCCC), established in 1992 began to recognise a framework outlining how to go about negotiating and setting binding limits on greenhouse gases.

Several years later, the Renewable Energy Directive (RED) was introduced in 2009 and still serves as the legal framework for clean energy development across all sectors of the EU economy and set. The RED has significantly increased the share of renewable energy sources in the EU consumption with the revised directive (EU/2018/2001), effective from 2023, setting a binding target of at least 42.5% renewable energy by 2030 (with an aim for 45%). It also streamlines permitting procedures for new renewable energy projects, including solar panels and wind turbines.

By prioritizing renewables, the EU reduces dependency on external energy suppliers and promotes domestically produced, cost-effective energy. Recent developments include raising the 2030 target to 40% (from 32%) in the 'Fit for 55' package, and further increasing it to 45% following geopolitical events. The EU remains committed to sustainability, energy security, and competitiveness through its renewable energy policies.

The introduction of a rebuttable presumption that renewable energy projects are of overriding public interest as introduced by the Council Regulation (EU) 2022/2577 presents direct support for the proposed project as this EIAR finds that there are no anticipated adverse effects on the environment that cannot be mitigated or compensated for. Additionally, the obligations for member states to designate 'renewable go to areas' was brought about to accelerate the consenting of renewable energy development at appropriate locations.

In the absence of mitigation, the potential risks to the Lower River Suir Special Area of Conservation (SAC), the River Barrow and River Nore SAC and the River Nore Special Protection Area (SPA) is the potential reduction in water quality and a reduction in available food biomass due to water quality degradation. However, following the application of the detailed mitigation measures, significant effects will be avoided, and it can be determined that there will be no risk of significant effects on the conservation status of the qualifying interest and special conservation interest species of the Lower River Suir SAC, the River Barrow and River Nore SAC, the River Nore SPA, Wexford Harbour and Slobs SPA, the Saltee Islands SPA, Poulaphouca Reservoir SPA, Ballycotton Bay SPA and Cork Harbour SPA.

The importance and urgency of reducing emission to combat global warming was reemphasised at COP29 held in November 2024 which found that we are not on track to limit global warming to 1.5 degrees Celsius and resulted several countries urging governments to shift from fossil fuels to renewable energy sources like wind and solar power.

As such, there is significant policy support for the accelerated development and delivery of renewable energy at EU level. The trends over the last number of years have been of ever-increasing targets for renewable energy deployment and increased policy support.

4.4.2 National Policy and Legislative Context

The following section sets out the relevant national policies which will influence the development of the country in the coming decades with respect to energy production, carbon neutrality and climate change mitigation. These policies are supported by the latest Programme for Government (2025) 'Securing our Future. This is a programme of investment and reform backed by ambitious actions in order to protect our country but also supporting significant progress in addressing critical social, economic, political, demographic and environmental challenges.

The "Accelerating Renewables" section within the "Protecting Our Environment" part of the Programme for Government 2025 outlines the government's commitment to significantly boost renewable energy production. The key goals include achieving 80% of electricity generation from renewable sources by 2030. This will be accomplished through the development of 9 GW of onshore wind and 8 GW of solar energy capacity. Additionally, the government plans to support community energy projects and invest in the necessary infrastructure to facilitate this transition. These efforts are aimed at creating a more sustainable and resilient energy system for Ireland's future. It also aims to utilise the new Planning Act to fast-track developments which further highlights support for renewable energy projects.

Other climate goals outlined within this section aim to 'Empower Communities in Renewable Energy and Make Climate Action Accessible' and 'Support Economic Growth with Renewable Energy'. To achieve this, the government will support battery development and take-up to allow portable energy and reduce grid dependence, and enable the creation of employment opportunities, all to ensure renewable energy benefits all communities.

Overall, it is the government's goal to 'lead a revolution in renewable energy' supported by the above mentioned aims to accelerate renewable energy generation and provide benefits to the local economy.

4.4.2.1 National Climate Action Legislation

The relevant EU and international policy and legislation outlined above are transposed into the Irish context through the introduction of the Climate Action and Low Carbon Development Act 2015 (as amended). This Act guides the preparation of Ireland's long term climate action strategies, climate action plans, national climate change adaptation frameworks and carbon budgets which all act as overarching national climate action policies and targets within the State.

4.4.2.1.1 Climate Action and Low Carbon Development Act 2015

This Act provides the statutory basis for the national transition objective set in the national policy position. It commits Ireland to being carbon neutral by 2050 and to also match Ireland's targets with those of the EU. It requires that the Minister for Communications, Climate Action, and the Environment must make and submit to Government a series of successive National Mitigation Plans and National Adaptation Frameworks. While there are no explicit targets set out within the Act itself, the legislation obliges the State to consider any existing obligations of the State under the law of the European Union or any international agreement. In effect the Act formally obliges the State to adhere to EU targets.

4.4.2.1.2 Climate Action and Low Carbon Development (Amendment) Act, 2021

The relevant international and EU level policy and legislation outlined above are transposed under the Climate Action and Low Carbon Development Act 2015 (as amended).

This Act provides the statutory basis for the national transition objective. It commits Ireland to being carbon neutral by 2050 and to match Ireland's targets with those of the EU. While there are no explicit targets set out within the Act itself, the legislation obliges the State to consider any existing obligations of the State under the law of the European Union or any international agreement. In effect the Act formally obliges the State to adhere to EU targets.

The purpose of the Climate Action and Low Carbon Development (Amendment) Act, 2021 is to provide for the approval of plans 'for the purpose of pursuing the transition to a climate resilient and climate neutral economy by the end of the year 2050'. The Act has set a target of a 51% reduction in the total amount of greenhouse gases over the course of the first two carbon periods ending the 31st of December 2030 relative to 2018 annual emissions.

Planning Authority's Obligations under the Climate Act 2015, as amended

For the purpose of this planning statement and the proposed development, it is helpful to include reference to the planning authority's obligations under current climate law. Section 17 of the Climate Action and Low Carbon Development Act (Amendment) 2021 requires that:

> *"(1) A relevant body shall, in so far as practicable,* ***perform its functions in a manner consistent with****—*
>
> *(a) the most recent approved climate action plan,*
>
> *(b) the most recent approved national long term climate action strategy,*
>
> *(c) the most recent approved national adaptation framework and approved sectoral adaptation plans,*
>
> *(d) the furtherance of the national climate objective, and*
>
> *(e) the objective of mitigating greenhouse gas emissions and adapting*

to the effects of climate change in the State.".

For context, it is worth noting that the text highlighted in bold is amended wording of section 15 of the previous 2015 Act, which required:

> *"15. (1) A relevant body shall, in the performance of its functions,* ***have regard to****…[sections (a) to (e) as set out above]"*

The change in wording, demonstrates a change in requirements from "*have regard to*" various national objectives, to, a must "*perform their functions in a manner consistent with*" the latest national climate action policies. This change in wording represents a considerable raising of the legal bar.

4.4.2.2 National Climate and Energy Policy

The sections below set out the various climate and energy policy documents relevant to the proposed project.

4.4.2.2.1 White Paper on Energy – Ireland's Transition to a Low Carbon Future 2015-2030

This White Paper on energy policy (Department of Communications, Energy and Natural Resources (December 2015) provides a complete energy policy update for Ireland. It sets out a framework to guide policy and actions that the Government intends to take in the energy sector up to 2030. It also outlines a transition to a low carbon energy system by 2050. It is significant as it was the first time a government has proposed the eventual elimination of fossil fuels from Ireland's energy system. The then Minister for Energy Alex White stated that "high-carbon fuels like peat and coal will give way to lower-carbon or renewable alternatives in the short to medium term before fossil fuels are largely replaced by renewable energy sources by 2050. Greenhouse gas emissions from the energy sector will "fall to zero or below by 2100".

The 2015 White Paper's stated objective is to "guide a transition to a low carbon energy system, which provides secure supplies of competitive and affordable energy to our citizens and businesses" as Ireland progresses towards a low carbon energy system. In doing so, it takes into account European and international climate change objectives and agreements, as well as Irish social, economic and employment priorities.

The White Paper sets out how Ireland's energy transition will be facilitated by an accelerated and diversified programme of renewable energy generation, and an increased focus on energy efficiency, facilitated by innovative financing. It promises strong regulation, effective markets, appropriate infrastructure, and deeper European cooperation. It heralds a new focus on citizens and communities as agents of change in the way Ireland generates, transmits, stores, conserves and uses energy. And it sets out actions to enable people to participate in energy-related decisions, including decisions about grid and renewable energy infrastructure.

The White Paper, and achievements since its introduction, underpins government policy to continue to support development of both onshore and offshore wind energy developments in accordance with published planning guidelines and local development plan policy.

4.4.2.2.2 The National Planning Framework: (NPF) First Revision

The first revision of Ireland's National Planning Framework (NPF), approved by the Government in April 2025, introduced significant updates to support the country's renewable energy ambitions, particularly in relation to onshore wind, solar energy, and grid infrastructure.

A major change was the introduction of regional renewable energy capacity allocations, which require each Regional Assembly to plan for specific targets, 9 GW of onshore wind and 8 GW of onshore solar by 2030. National Policy Objectives (NPOs) 74 and 75 introduce a structured approach to planning for renewable electricity capacity. Regional Assemblies are required to plan for specific onshore wind and solar capacity allocations, as outlined in Table 9.1 of the NPF and set out in Figure 4-2 below. The proposed project is located in the Southern Region. As of 2023, the region had an energised onshore wind capacity of 2,622 MW. To meet national climate and energy goals, an additional 978 MW of onshore wind capacity is allocated for development by 2030. This brings the Southern Region's total share of the national onshore wind target to a significant 40% of the national share in 2030.

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 Wind			**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**	

Figure 4-2: Regional Renewable Energy Capacity Allocations

NPO 70 promotes the generation and use of renewable energy in suitable locations across both built and natural environments to help meet Ireland's 2050 climate neutrality goals. These objectives ensure that renewable energy development is integrated into spatial planning at all levels, supported by scientific evidence and aligned with legislative requirements. Additional objectives, such as NPOs 87, 89, and 94, reinforce environmental protection, heritage conservation, and noise management, ensuring that renewable energy expansion occurs within sustainable and socially responsible frameworks.

The revised NPF also emphasized the need for grid development and expansion, recognizing that meeting regional capacity targets will require coordinated upgrades to the electricity grid at both national and local levels. National Policy Objectives (NPOs) 71 and 72 specifically support the development and interconnection of onshore grid infrastructure, while NPO 55 promotes sustainable international grid connectivity enhancements.

The NPF also covers a wide range of national policy objectives and National Strategic Outcomes (NSO) such as NSO 8. The key outcome provided for under NSO 8 is to transition our society to *'competitive, low-carbon, climate-resilient, biodiversity rich, and environmentally sustainable and carbon neutral economy by 2050'* and states that '*new energy systems and transmission grids will be necessary for a more distributed, more renewables focused energy generation system, harnessing both*

considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy'.

The NSO further states that *'diversification of our energy production systems away from fossil fuels and towards green energy such as wind, wave, solar and biomass, together with smart energy systems and the conversion of the built environment into both generator/consumer of energy and the electrification of transport fleets will require the progressive and strategic development of a different form of energy grid'*.

In summary the key steps indicated for delivering a low carbon society according to NSO 8 are as follows:

- Delivery of 80% of our electricity needs from renewable sources by 2030 with a strategic aim to increase renewable deployment in line with EU targets and national policy objectives out to 2030 and beyond;
- Reinforce the distribution network and transmission network to facilitate planned growth;
- Strengthen energy security and resilience to support an island population of 8 million people;
- Consideration of carbon neutral electricity generation that would be facilitated through harnessing carbon capture and storage;
- Interconnectors offer the opportunity to connect to the EU Grid system; and
- Roll out National Smart Grid Plan;
- District heating networks developed where feasible.

Overall, the revised NPF represents a more active, plan-led approach to renewable energy development, aligning with Ireland's climate targets. It sets the stage for more integrated and regionally tailored energy planning, though its full impact will depend on how quickly regional and local authorities implement the new objectives.

4.4.2.2.3 National Development Plan 2021-2030

The National Development Plan 2021-2030, hereafter referred to as the NDP, sets out the investment priorities at national, regional and local planning levels that will facilitate the implementation of the NPF.

In the context of the energy sector, the principle objective of the NDP is to assist in ensuring a 'long-term, sustainable and competitive energy future for Ireland'. Targeted investment within regulated network infrastructure ensures that Ireland's power grid is:

- Maintained to the highest international safety standards;
- Fit for purpose in the medium to longer-term in order to meet projected demand levels; and meets the challenge of integrating world-leading levels of renewable energy; and

- The NDP recognises that the national objective of transitioning by 2050 to a competitive low-carbon, climate resilient, and environmentally sustainable economy and society must influence public capital investment choices over the next 10 years. It acknowledges that Ireland's energy system requires a radical overhaul to achieve its energy and climate objectives by 2050. This means how energy in Ireland is generated and used needs to fundamentally change; and The NDP states that investment in renewable energy sources, ongoing capacity renewal, and future technology affords Ireland the opportunity to comprehensively decarbonise our energy generation. Renewable energy, including wind technology, will play a key role in helping to diversify away from a reliance on fossil fuels.

National Development Plan Review 2025

In July 2025 the National Development Plan Review 2025 was published. This document is a strategic framework for public investment in infrastructure in Ireland. Wider funding specifically for energy is outlined in the NDP Review, and energy is identified as being a high priority for general government investment. This includes an increase in government equity shareholdings of ESB Networks and EirGrid, with €3.5 billion in equity earmarked for energy projects. Chapter 8 of the NDP Review outlines reforms proposed to support the financial investments outlined in the plan. In regard to energy projects regulatory and planning reforms are identified as being critical to meet outlined targets.

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

The Climate Action Plan 2025 (CAP25) is the fourth annual update to Ireland's Climate Action Plan and was published on 15th of April 2025.

CAP25 builds upon the previous Climate Action Plan 2024 (CAP24) by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings and it should be read in conjunction with CAP24, in contrast to previous iterations of the Climate Action Plan. It provides a roadmap for taking decisive action to halve Ireland's emissions by 2030 and achieve climate neutrality by no later than 2050, as committed to in the Climate Action and Low Carbon Development Act 2015 (as amended). It also lays out a roadmap of actions which will ultimately lead us to meeting our national climate objective of pursuing and achieving, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy. It aligns with the legally binding economy-wide carbon budgets and sectoral emissions ceilings that were agreed by Government in July 2022.

CAP25 finds that 'rapid and significant reductions in GHG emissions are required if we are to meet the 2015 Paris Agreement and the UN's Sustainable Development Goals'. As such, Section 1.4 of CAP25 sets out the importance of 'accelerating climate action' and stating that 'the economic benefits of the transition to climate neutrality are being recognised and acted upon internationally' and further stating that, 'this points to the need to act now, with urgency, to ensure Ireland's future in a low-carbon world.'

In terms of the current scenario in the electricity sector, CAP25 notes that in the first half of 2024, emissions were down over 17%, (their lowest level for decades) and noting increasingly positive signs across solar and wind energy. It also found that Irish wind farms generated nearly 40% of Ireland's total electricity demand in the first half of 2024, making Ireland third in the world for installed wind power capacity per capita.

Section 11.2.1 of CAP25 emphasises that Ireland's plan to further reduce emissions in the electricity sector focuses on a renewables-led system, which means accelerating the deployment of new renewable electricity generation capacity and infrastructure.

As with CAP24, CAP25 also seeks to accelerate the delivery of onshore wind by providing 9 GW of onshore wind by 2030. CAP24 also acknowledges that some sectors and communities will be more impacted than others with the costs of transition to a low carbon economy. To address this, CAP24 embodies Just Transition principles which are also supported by CAP25, and a Just Transition Commission has been established to provide advice to the Government; and retains one of the most important measures of CAP23 which is to increase the share of electricity demand generated from renewable energy sources to 80% by 2030. This national target is retained under CAP25.

CAP25 also places significance on the revised NPF, as it supports the development of electricity grid infrastructure via setting out regional renewable electricity capacity allocations for 2030. As such, Regional Assemblies and Local Authorities must plan for sufficient wind and solar energy development to meet these targets. Each Regional Assembly will prepare a Regional Renewable Energy Strategy (RRES) to coordinate efforts and set specific targets for local authorities. The Revised NPF, is considered essential to ensure a pipeline of projects to meet the electricity carbon budget program.

It is also important to note the key metrics to deliver abatement in electricity as outlined in CAP24 to deliver a decarbonised economy for Ireland by 2050, as shown in Figure 4-3.

Table 12.5 – Key Metrics to Deliver Abatement in Electricity[71]

Theme	2025 KPI	2025 abatement (vs. 2018) $MtCO_2eq.$	2030 KPI	2030 abatement (vs. 2018) $MtCO_2$ eq.	2031-2035 measures
Accelerate Renewable Energy Generation[72]	50% renewable electricity share of demand 6 GW onshore wind capacity Up to 5 GW solar PV capacity, including at least 1 GW of new non-utility solar	2. 21	80% renewable electricity share of demand 9 GW onshore wind capacity At least 5 GW offshore wind capacity 8 GW solar PV capacity, including 2.5 GW of new non-utility solar Green hydrogen production from renewable electricity surplus generation	7.18	Decarbonisation Roadmap for a net-zero power system Green hydrogen production via 2 GW offshore wind
Accelerate Flexibility	Maximum level of renewables at any one time on the grid: 85% Dispatch down (excluding surplus generation) of renewables below 7% Minimise surplus generation Required long term storage (4 hour plus) in place	See above abatement figure	Maximum level of renewables at any one time on the grid: 95-100% Dispatch down (excluding surplus generation) of renewables below 7% Minimise surplus generation Required additional long-term storage (4 hour plus) in place At least 2 GW of new flexible gas-fired generation Zero-emission gas-fired generation from biomethane and hydrogen commencing by 2030	See above abatement figure	Required additional long duration storage technologies in place Increased zero emission gas-fired generation to enable a net zero power system
Demand Management	Demand side flexibility 15-20% Zero carbon demand growth	2.21	Demand side flexibility 20-30% Zero carbon demand growth	7.18	Demand side flexibility 30% Zero carbon demand growth
Total Estimated Abatement Potential					

Figure 4-3: CAP24 Key Metrics to Deliver Abatement in Electricity

4.4.2.2.5 Renewable Electricity Support Scheme (RESS)

RESS is a Renewable Electricity Support Scheme, which provides financial support to renewable electricity projects in Ireland through a series of scheduled, competitive auctions. It is a pivotal component of the National Energy and Climate Plan and is essential for achieving Ireland's renewable electricity target by 2030, with a primary focus on cost effectiveness, the RESS will deliver 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; and
- Increasing energy security, energy sustainability and ensuring the cost effectiveness of energy policy.

On 27th February 2020, the Department of Communications, Climate Action and Energy published the final terms and conditions for the first competition under the Scheme. The RESS will be implemented through a series of renewable electricity competitions, providing a renewable electricity roadmap and indicative timelines and capabilities.

Ireland's Renewable Electricity Support Scheme (RESS) has been a central mechanism for accelerating the deployment of renewable energy projects since its launch in 2020, with five auctions held to date. The scheme was designed to support Ireland's target of achieving 80% renewable electricity by 2030 and has primarily focused on onshore wind and solar Photovoltaic (PV) projects. Each auction has used a competitive bidding process to determine which projects receive financial support through guaranteed strike prices.

The first RESS auction in 2020 awarded support to 82 projects, totalling 1,275 MW, with a strong showing from both wind and solar. RESS 2 in 2022 was the largest, allocating 1,948 MW across 80 successful bids. RESS 3 in 2023 saw a significant drop in awarded capacity, with only 414 MW contracted, reflecting market challenges. RESS 4 in 2024 provisionally awarded 1,333 MW, including 959 MW of solar and 374 MW of wind, with an average strike price of €96.85/MWh. The most recent auction, RESS 5, held in September 2025, provisionally awarded 1,079 MW, dominated by 860 MW of solar and 219 MW of wind, at an average strike price of €98.81/MWh[15].

4.4.2.3 Conclusion

Ireland is committed to achieving carbon neutrality by 2050, with a national target of 80% renewable electricity by 2030.

The Climate Action Plans 2024 and 2025 emphasize accelerating renewable deployment and ensuring a just transition. The proposed project supports these plans by delivering low-carbon electricity and creating local economic opportunities. CAP25 retains previous commitments and sets clear benchmarks for both onshore and offshore wind development. By 2025, Ireland aims to have 6 GW of onshore wind capacity. These targets are stepping stones toward the 2030 goals of 9 GW onshore and at least 8 GW offshore, which support the national objective of achieving 80% renewable electricity by 2030.

[15] RESS 5 Provisional Auction Results Released | Mason Hayes Curran.

Despite these efforts, Ireland faces significant challenges in meeting its 2030 targets. According to the Environmental Protection Agency (EPA), Ireland is currently projected to achieve only a 23% reduction in greenhouse gas emissions by 2030 far short of the legally binding 51% target[16]. Some of the key obstacles include delays in planning and permitting and grid capacity constraints[17].

The overall share of renewable energy in final energy consumption which includes electricity, heating, and transport stands at just 14.6%, placing Ireland among the lowest in the EU and well below the 42.5% target set for 2030[18].

In the first quarter of 2025, wind energy played a significant role in Ireland's electricity generation, supplying approximately 38% of the country's electricity needs[19]. Over the first eight months of the year, wind continued to be a dominant source, meeting 31% of total electricity demand[20]. This reflects Ireland's strong reliance on wind as a renewable energy source and its importance in the national energy mix. As of December 2024, Ireland had installed just over 4.8 GW of onshore wind capacity.

On the planning front, ACP approved seven wind energy projects totalling 402 MW in Q1 2025, making it a record quarter for wind energy approvals. Despite this achievement, ACP must approve 860 MW of wind capacity annually to remain on track for its 2030 onshore wind target[21]. This underscores the urgency for streamlined planning processes and enhanced support for wind energy development to meet climate and energy goals.

On the emissions front, Ireland emitted 58.8 million tonnes of CO_2 equivalent in 2023. The EPA projects only a 23% reduction in emissions by 2030, far short of the legally binding 51% reduction target under the Climate Action and Low Carbon Development Act[22]. The 2050 Target is to achieve climate neutrality, i.e., a net-zero emissions economy that is climate resilient, biodiversity-rich, and environmentally sustainable. According to the Environmental Protection Agency (EPA) report titled *Ireland's Greenhouse Gas Emissions Projections 2023–2050*, Ireland's emissions trajectory is assessed under two key scenarios: With Existing Measures (WEM) and With Additional Measures (WAM). Under both scenarios Irland is projected to fall short of the targets. The WAM scenario, which incorporates additional planned but not yet implemented measures, offers a more optimistic outlook. If all proposed policies in the Climate Action Plans are fully executed, Ireland could achieve up to 23% emissions reduction by 2030. However, even this falls short of the 51% target, and the pathway to net-zero by 2050 remains uncertain without further acceleration in policy implementation and sectoral transformation.[23]

Without accelerated action and systemic changes, Ireland risks breaching its carbon budgets and facing financial penalties under EU compliance mechanisms.

Legislation such as the Climate Action and Low Carbon Development Acts (2015 & 2021) provides the legal framework for climate action, including carbon budgets and mandatory

[16] Ireland Faces Challenges Meeting 51% Emissions Target by 2030.
[17] Ireland's Energy Transition — Insight | PwC Ireland.
[18] Share of renewable energy in final energy consumption | Ireland | Europe's environment 2025 (EEA).
[19] Wind farms provided 38 per cent of Ireland's electricity in first three months of 2025.
[20] Wind farms provided over 25% of electricity in August.
[21] Planning Dashboard.
[22] Ireland significantly off track on 2030 climate targets.
[23] Ireland's Greenhouse Gas Emissions Projections 2023-2050 | Environmental Protection Agency.

climate plans. The proposed Wind Farm supports these objectives by delivering clean energy and helping meet sectoral emissions reduction targets.

The project complies with key strategic policies:

- The White Paper on Energy (2015–2030) promotes a shift to low-carbon energy systems. The proposed project supports this by replacing high-carbon sources with wind energy.
- The National Planning Framework (NPF) 2025 sets regional renewable energy capacity targets. The proposed project is located in the Southern Region, which is allocated 978 MW of additional onshore wind capacity by 2030—making up 40% of the national target. The project contributes directly to this regional goal.
- The National Development Plan (NDP) 2021–2030 prioritizes investment in energy infrastructure. The proposed project aligns with this by supporting grid integration and long-term energy resilience.

The project is eligible under the Renewable Electricity Support Scheme (RESS), which funds renewable projects through competitive auctions. The proposed wind farm contributes to Ireland's renewable capacity and supports cost-effective, secure energy supply.

In summary, the proposed Wind Farm is fully aligned with Ireland's national climate and energy policies, legislative requirements, and strategic planning frameworks. It plays a key role in helping Ireland meet its 2030 and 2050 climate goals.

4.4.3 Other Environmental Policies

4.4.3.1 National Energy Security Framework

The National Energy Security Framework was launched in 2022 to provide an overarching and comprehensive response to Ireland's energy security needs in the context of the war in Ukraine.

The Framework sets out how the government can support households and businesses, with a particular focus on protecting those most at risk of fuel poverty, how it is already ensuring Ireland's energy security, and how it will speed up the country's shift to increased energy efficiency and indigenous renewable energy systems. It also sets out how consumers and businesses can be supported to save energy and save money.

The Framework sets actions in response to issues such as ensuring the security of energy supply in the near-term and over the longer term, reducing Ireland's dependency on imported fossil fuels.

Within the context of the proposed project, the framework seeks to replace fossil fuels with renewable energy sources such as wind.

4.4.3.2 Irelands Greenhouse Gas Emission Projections 2016-2035

The National Climate Change Strategy designated the Environmental Protection Agency (EPA) with responsibility for developing annual national emission projections for greenhouse gases across all key sectors of the economy, including transport. The Intergovernmental Panel on Climate Change (IPCC) has reiterated that the window for climate action is rapidly closing. To limit global warming to below 2°C, renewable energy sources such as wind must grow from

around 30% of global electricity generation to at least 80% by 2050, with deep and sustained emissions reductions across all sectors required this decade[24].

The EPA's most recent publication, the State of the Environment Report 2024[25], identified climate change and biodiversity loss as Ireland's most pressing environmental challenges. The EPA acknowledged the government's Climate Action Plan as an important step toward meeting national and EU climate goals, but graded Ireland's current performance on tackling greenhouse gas emissions as "very poor."

The EPA's latest projections (2025) show that Ireland is not on track to meet its legally binding 51% emissions reduction target by 2030. Even with all planned measures, emissions are projected to fall by only 23% compared to 2018 levels, and Ireland may need to purchase emissions allocations from other EU member states to meet its obligations. The EPA also noted that Ireland could meet its non-ETS EU target of a 30% reduction by 2030 (compared to 2005) only if all planned policies are implemented.

4.4.3.3 Commission for Regulation of Utilities: Grid Connection Policy

The Commission for Regulation of Utilities (CRU) launched a new grid connection policy in March 2018 for renewable and other generators, known as the Enduring Connection Policy (ECP-1), which sought to allow "shovel ready" projects, that already have a valid planning permission, connect to the electricity networks. The principal objective which guides this decision is to facilitate greater opportunities for advanced projects to connect to the network in addition to preparing for future, more regular batches for connection. In August 2018, the successful applicants for new connection capacity under ECP-1 were published.

On the 10th June 2020, the CRU further published the Enduring Connection Policy – Stage 2 (ECP-2) Decision (CRU/20/060). This decision marked a major milestone in the Enduring Connection Policy regime and provides for three batches of new generation connection offers to access the electricity network.

The number of connection offers represents an increase in ambition from ECP-1 and sets a challenging but achievable programme for the System Operators (SO's). This will facilitate new renewable generators competing in forthcoming RESS auctions as well as conventional generators and system service providers.

The application window for the fourth annual batch (ECP-2.4) opened on 1st of October 2023 and closed on 30th of November 2023. Following the closure of the application window, the batch was formed over the following three months. Three batches have been awarded connection offers in May 2024 where projects having the largest volume of GWhrs/yr generated given highest priority under Category A. Maximum number of connection offers were awarded to solar farms, followed by battery and then wind farms. The ECP 2.4 connection report[26] stated that, the SOs were developing a proposal to commence a pilot of "renewable hubs" to run in parallel with the opening of the ECP-2.4 batch window.

[24] The evidence is clear: the time for action is now. We can halve emissions by 2030. — IPCC.
[25] Ireland's State of the Environment Report 2024 | Environmental Protection Agency.
[26] Enduring Connection Policy (divio-media.com).

According to the Renewables Hub Pilot Consultation report[27], Renewable Hubs will be established in new or existing substations, with network capacity created based on a known pipeline of projects, with SOs engaging industry stakeholders.

The Renewable Hubs pilot is expected to include some, but not all, of the projects within the batch. In the longer-term the CRU expects that,

> *"Renewable Hubs will be developed in areas which strike a balance between grid-optimal locations and renewable resources, thus providing locational signals for project developers. This could include targeted hubs in areas that could release significant renewable capacity. "*

The introduction of this policy demonstrates the strong policy support to accellerate the grid connection for advanced projects such as renewable energy projects (particularly via the ECP-2 which prioritised large reneable enrgy projects) and to further secure success at RESS auctions. The potential introduction of the 'renewable hubs' could further accellerate delivery of the proposed project.

4.4.4 Regional Policy Context

4.4.4.1 Regional Spatial and Economic Strategy, Southern Region

The proposed project is located within the southern region for the purposes of regional policy. The Regional Spatial and Economic Strategy (RSES) came into effect on the 31st of January 2020 and provides a high-level development framework for the Southern Region that supports the implementation of the National Planning Framework (NPF) and the relevant economic policies and objectives of Government. It provides a 12-year strategy to deliver the transformational change that is necessary to achieve the objectives and vision of the Southern Regional Assembly (SRA).

[27] CRU202353_Renewable_Hubs_Pilot_Consultation.PDF (divio-media.com).

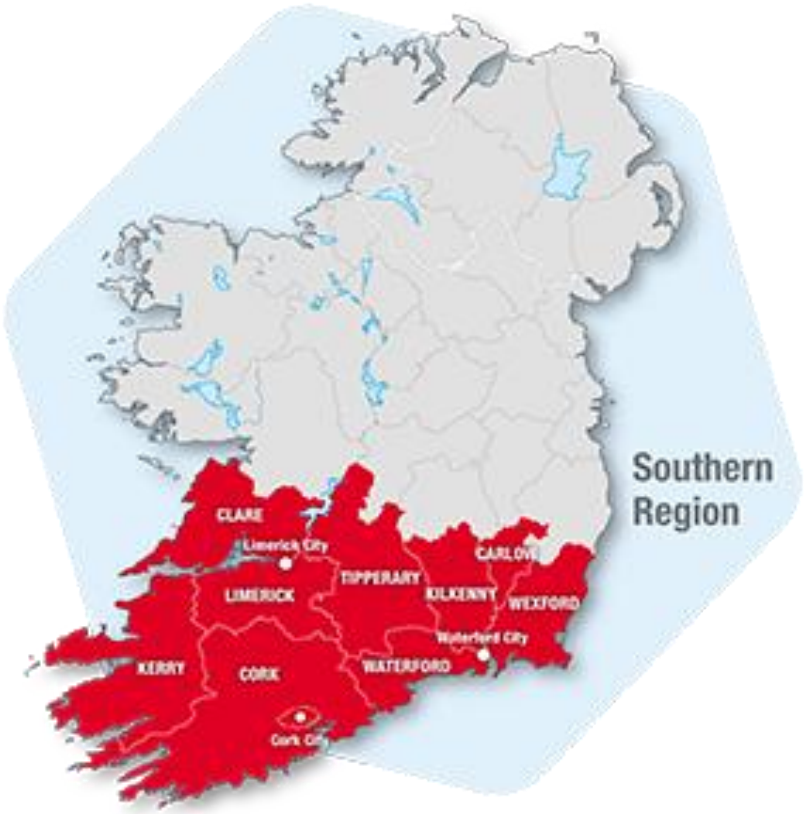

Figure 4-6: RSES Southern Spatial Area

Section 8.2 of the RSES identifies that.

> *"The Region is particularly rich in renewable energy resources and contains significant energy generation infrastructure of national and regional importance, including hydro-generation, thermal generation at Moneypoint, Tarbert, Marina, Aghada, Whitegate and Great Island."*

According to Chapter 5 of the Regional Spatial and Economic Strategy), the RSES acknowledges and supports the numerous prospects for wind to serve as a significant source of renewable energy stating that technology related to wind energy is crucial in providing Ireland with affordable, clean electricity.

The Regional Spatial and Economic Strategy (RSES) outlines a comprehensive framework to advance sustainable development and economic resilience across the region. A number of policies are particularly relevant to this project.

The Regional Spatial and Economic Strategy supports renewable energy development and grid infrastructure through a coordinated set of objectives. RPO 95, RPO 98, and RPO 99 collectively promote the region as a leader in renewable energy by implementing national strategies, preparing a Regional Renewable Energy Strategy, and enabling the sustainable development of onshore and offshore wind energy alongside related grid infrastructure in line with national guidelines. Complementing this, RPO 96, RPO 219, RPO 221, and RPO 222 focus on strengthening electricity and gas networks, reinforcing energy infrastructure to meet future growth, and facilitating enhanced transmission capacity, including community-based renewable

projects. Together, these policies aim to ensure a secure, resilient energy system while advancing the region's transition to a low-carbon future.

Following the first revision of Ireland's National Planning Framework (NPF) in April 2025, the Regional Spatial and Economic Strategies (RSESs) are now required to undergo formal review and updating to align with the revised national objectives. This update process is mandated under the Planning and Development Act 2024.

The revised NPF introduces updated targets for renewable energy capacity, including regional allocations for onshore wind and solar PV. As a result, each Regional Assembly must revise its RSES to reflect these allocations and ensure that local authority development plans are consistent with national priorities. This includes identifying suitable land for renewable energy development, among other strategies.

4.4.4.2 Conclusion

The proposed wind farm complies with the Regional Spatial and Economic Strategy (RSES) for the Southern Region by directly supporting its renewable energy and low-carbon objectives. The RSES identifies the Southern Region as rich in renewable energy resources and highlights wind energy as a key technology for delivering clean, affordable electricity. The project aligns with Regional Policy Objective (RPO) 99, which supports the sustainable development of onshore wind energy in appropriate locations, and with RPO 219, which promotes the provision of new energy infrastructure to meet future regional needs.

Additionally, the wind farm contributes to RPO 56 and RPO 87, which aim to accelerate the transition to a low-carbon economy and increase the use of renewable energy across sectors. It also supports RPO 95, which encourages innovation and leadership in renewable energy generation, and RPO 98, which calls for the development of a Regional Renewable Energy Strategy. The project's location within the Southern Region ensures it contributes to regional capacity targets set out in the revised National Planning Framework (NPF), which mandates updates to RSES documents to reflect new renewable energy allocations.

Overall, the proposed wind farm is well-aligned with the RSES's strategic goals, helping to deliver regional and national climate targets, support economic diversification, and reinforce energy infrastructure in a sustainable and timely manner.

4.4.5 Local Policy Context

The proposed project is located entirely in County Kilkenny and thus informed by the provisions of Kilkenny City and County Development Plan 2021-2027 (Kilkenny CDP).This section will set out the relevant objectives, policies, and provisions for wind energy in the adopted Kilkenny CDP which are relevant to the proposed project.

4.4.5.1 Kilkenny County Development Plan 2021-2027

The Kilkenny CDP2021-2027 is the land use plan and overall strategy for the proper planning and sustainable development of the functional area of County Kilkenny. Kilkenny County Council adopted the Kilkenny CDP on the 3rd September 2021. The CDP came into effect on the 15th October 2021.

It is important to note that a Ministerial Direction was issued on 15th October 2021, with respect to the CDP which states that:

"In accordance with Section 31(4) of the Planning and Development Act 2000, those parts of the Kilkenny City and County Development Plan 2021 – 2027 Plan referred to in the notice shall be taken not to have come into effect, been made or amended; namely;

Chapter 11, Renewable Energy:

- *Section11.4 Kilkenny Targets;*
- *Section 11.5.1 Current status and targets; and*
- *Figure 11.4 Wind Strategy areas. "*

The reason for the Draft Direction are as follows:

I. *The Development Plan as made is inconsistent with Ministerial Guidelines issued under Section 28 of the Act, specifically item 2 of the Specific Planning Policy Requirement contained in the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (July 2017), which sets out the requirement for the Planning Authority to comply with the aforementioned Specific Planning Policy Requirement under section 28(1C). In particular, the Development Plan fails to identify renewable energy targets (in megawatts) which Kilkenny can contribute in delivering its share of overall Government targets on renewable energy and climate change mitigation over the plan period.*

II. *The Development Plan contains conflicting objectives on renewable energy sustainable development and climate action such that the adopted Plan, without providing sufficient compensatory measures, significantly reduced the extent of the areas indicated as 'acceptable in principle' that were identified in the draft Development Plan as being necessary to achieve the target of 201MW required to ensure that 100% of electricity demand for Kilkenny is met from renewable sources by 2030 and to ensure consistency with the climate action plan.*

III. *The Development Plan has therefore not been made in a manner consistent with the recommendations of the Office of the Planning Regulator under Section 31 AM and fails to set out an overall strategy for the proper planning and sustainable development of the area.*

Following the Minister's notice a public consultation period was held from 29th October 2021 to the 12th November 2021. Taking in to account the ministerial direction and the public consultation a report was prepared by the Chief Executive of Kilkenny County Council setting out a response. This was sent to the Minister, and it is now the responsibility of the Minister to decide on whether to make a Direction. There is no timeline set out in planning legislation for this decision. The effect of the Minister's notice of 15th of October 2021 is to suspend those parts of the Development Plan to which the notice related. The remainder of the Development Plan continues to apply. It contains a number of policies that are relevant to the Proposed Development and the application must be decided on the basis of these policies and applicable regional, national and international policy and regulations.

The strategic aim (which remains in force) of the Kilkenny CDP as outlined under Chapter 11 is:

"To generate 100% of electricity demand for the County through renewables by 2030 by promoting and facilitating all forms of renewable energies and energy efficiency improvements in a sustainable manner as a response to climate change in suitable locations having due regard to natural and built heritage, biodiversity and residential amenities."

Chapter 2 of the CDP sets out strategic objectives that are still in effect and supportive of the proposed project and include the following:

Table 4-1: Relevant Policy Objectives from the CDP in relation to climate action

CDP Policy / Objective	Description
Objective 2B	To support the implementation of the National Climate Action Plan and the National Climate Action Charter for Local Authorities, and to facilitate measures which seek to reduce emissions of greenhouse gases by embedding appropriate policies within the Development Plan.
Objective 2C	To promote, support and direct effective climate action policies and objectives that seek to improve climate outcomes across the settlement areas and communities of County Kilkenny helping to successfully contribute and deliver on the obligations of the State to transition to low carbon and climate resilient society.
Objective 2G	To reduce energy related CO2 emissions of Kilkenny County Council
Objective 2H	To achieve the commitment under the European Climate Alliance to the reduction of greenhouse gas emissions by 10 percent every 5 years

Specific objectives for the proposed project are set out in Chapter 11 which have not been suspended are as follows:

Table 4-2: Relevant Policy Objectives from the CDP in relation to renewable energy

CDP Policy / Objective	Description
Objective 11A	To support and facilitate the provision of energy in accordance with Ireland's transition to a low carbon energy future by means of the maintenance and upgrading of electricity and gas network grid infrastructure and by integrating renewable energy sources and ensuring our national and regional energy system remains safe, secure, and ready to meet increased demand as the regional economy grows over the period of the plan.
Objective 11B	To identify and designate a Decarbonation Zone (DZ) in the Council's Climate Action Plan for a spatial area in which a range of climate mitigation, adaptation and biodiversity measures are developed to address local low carbon energy, greenhouse gas emissions and climate needs to contribute to national climate action.

Compliance against relevant planning policies and objectives have been covered within the planning statement submitted with this application.

4.5 Need for the Development

The need for the proposed project is driven by the following factors:

- Ireland is legally bound under international agreements such as the Kyoto Protocol and the Paris Agreement to reduce its greenhouse gas (GHG) emissions. These commitments are reinforced by EU climate legislation. Failure to meet these targets could result in financial penalties and reputational damage. The proposed project directly supports Ireland's decarbonisation goals by enabling the generation of clean, renewable energy, thereby reducing reliance on fossil fuels. A requirement to increase Ireland's national energy security as set out in Ireland's Transition to a Low Carbon Energy Future 2015-2030 Adopted Paper;
- Ireland's energy system is heavily reliant on imported fossil fuels, particularly natural gas from the UK and continental Europe. This dependency exposes the country to geopolitical risks, price volatility, and supply disruptions. The government's strategy document, *Ireland's Transition to a Low Carbon Energy Future 2015–2030*, emphasizes the need to enhance energy independence through domestic renewable energy development. The proposed project contributes to this goal by harnessing Ireland's abundant wind resources, thereby improving energy resilience and reducing import dependency;
- A requirement to diversify Ireland's energy sources, with a view to achievement of national renewable energy targets and an avoidance of significant fines from the EU (the EU Renewables Directive);
- Provision of cost-effective power production for Ireland which would deliver local benefits;
- Ireland's electricity prices are among the highest in the EU, partly due to its reliance on imported gas. Global market fluctuations such as those seen during the 2022 energy crisis can lead to sharp price increases. By expanding domestic wind generation, the proposed project helps stabilize energy prices, reduce exposure to global fuel markets, and protect consumers and businesses from future shocks.;
- Ireland faces a significant electricity shortfall, with over 4 GW of additional capacity needed to meet projected demand and climate targets. The Climate Action Plan 2024 (CAP24) and CAP25 set a target of 9 GW of onshore wind capacity by 2030. As of the end of 2024, only 4.8 GW was installed (Wind Energy Ireland). This leaves a gap of 4.2 GW to be filled within five years. The proposed project is essential to closing this gap, ensuring grid reliability, and enabling the electrification of sectors such as transport and heating; and
- To achieve the 9 GW onshore wind capacity target by 2030, the Revised NPF mandates regional renewable energy capacity allocations, requiring each Regional Assembly to plan for specific contributions. For the Southern Region, where the proposed wind farm is located, had an energised onshore wind capacity of 2,622 MW as of 2023 and was allocated an additional 978 MW to be developed by 2030. This represents 40% of the national onshore wind target.

4.6 SUMMARY

There are significant International, European, National and Local policy supports for renewable energy technologies in the country. In September 2022, it was confirmed that Ireland yet again missed its targets for reducing greenhouse gas emissions as per the latest report from the Climate Change Advisory Council – 'Annual Review September 2022'[28] – "Ireland has failed to meet its 2020 EU target of a 20% reduction in greenhouse gas emissions and will have to use allowances purchased from other Member States to meet the shortfall". More recently, the 'Annual Review For All' published in October 2024[29] states that ''planning processes must ensure that new energy infrastructure is developed to withstand future projected climate impacts.''

Europe's 2050 targets means that energy production will have to be almost carbon-free by that time. While Ireland has come a made progress in renewable energy generation in recent years, the targets are consistently increasing. These target commitments, and energy and environmental policy and legislation demonstrate a need for increased renewable energy production in Ireland.

It is recognised that there are a range of renewable resource alternatives that could be explored to meet our International and European commitments, however, onshore wind is a central pillar of Ireland's decarbonisation strategy in the short, medium and long term.

As a small island nation, the challenges are to deliver a secure supply of energy to meet our growing needs and drive economic prosperity, while making sure cost is at the forefront of decision-making, alongside reducing CO_2 emissions to protect the environment and limit the impact of climate change for future generations.

Ireland is one of the top 20 countries in its use of wind energy worldwide[30]. As mentioned within CAP25, the Irish government is ramping up its aspirations on renewables, aiming for 80% renewable electricity by 2030. Wind energy provides a clean, sustainable solution to our energy problems. It can be used as an alternative to fossil fuels in generating electricity, without the direct emission of greenhouse gases.

The benefits of wind power are considered to be many and these can be summarised as follows:

Wind energy releases no pollution into the air or water:

- Wind energy is both renewable and sustainable. The wind will never run out, unlike the earth's fossil fuel reserves (such as oil and gas);
- Adding wind power to the energy supply diversifies the national energy portfolio and reduces reliance on imported fuels;
- Wind turbines have a relatively small footprint;
- Wind turbines are considered relatively low maintenance;
- The wind energy sector protects consumers from continued volatility in the gas sector. A recent Wind Energy Ireland news article stated that, ''spending on gas for electricity in Ireland was cut by almost one billion euro last year, as wind energy supplied 32 per cent of Ireland's electricity''; and

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https://www.climatecouncil.ie/media/climatechangeadvisorycouncil/contentassets/publications/CCACANNUAL-REVIEW-2022.pdf Accessed on 1st May 2025.
29 CCAC-AR-2024-SfA-final.pdf. Accessed on 1st May 2025.
30 Wind Power by Country 2025. Accessed on 1st May 2025.

- Energy in Ireland 2024 Report published by the SEAI has indicated that wind energy accounted for c.82.7% of renewable electricity generated in Ireland in 2023. The CO2 intensity of electricity generation fell to a historic low in 2020, before increasing slightly in 2021 due to an increase in emissions from coal and, to a lesser extent, oil. The CO2 intensity fell again in 2023, which was driven by a reduction in the proportion of oil and coal within the energy generation mix.

At a national level, the proposed project complies with CAP24 and CAP25 and is increasing the capacity of onshore wind in Ireland. It also contributes to the reduction of greenhouse gas emissions within the electricity sector with knock on effects on other sectors as well, thus having an overall impact on limiting emissions within sector wise ceilings set within CAP24 and CAP25. In addition, the proposed project is aligned with the objectives of RSES for the Southern Region i.e., to support the development of secure, reliable and safe supplies of renewable energy; and other policies as described above.

The Climate Action and Low Carbon Development Acts 2015 to 2021 as amended has set a target of a 51% reduction in the total amount of greenhouse gases over the course of the first two carbon periods ending 31st of December 2030 relative to 2018 annual emissions. The 2021 Climate Bill defines the carbon budget as 'the total amount of greenhouse gas emissions that are permitted during the budget period'.

At a local level, the proposed project is compliant with the policies and objectives of the Kilkenny City and County Development Plan 2021-2027, such as Objectives 2B, 2C, 2G, and 2H which all aim to reduce carbon emissions and greenhouse gases via implementing supporting climate action policies.

The proposed project will have several significant long-term and short-term benefits for the local economy including job creation, provision of amenity, during construction, additional employment will have been created in the region through the supply of services and materials to the development. In conjunction to this, there will also be income generated by local employment from the purchase of local services i.e., travel and lodgings.

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