

Fairgreen House
Fairgreen Road
Galway
H91 AXK8
Tel: + 353 (0)91 565211
Email: info@tobin.ie

Block 10-4,
Blanchardstown Corporate
Park
Dublin
D15 X98N
Tel: + 353 (0)1 8030401
Email: info@tobin.ie

Market Square
Castlebar
Mayo
F23 Y427
Tel: +353 (0)94 9021401
Email: info@tobin.ie

Unit 4, Crescent Court,
St. Nessan's Road,
Dooradoyle, Limerick
V94 V298
Tel: +353 (0)61 976 262
Email: info@tobin.ie

First Floor,
Carroll House,
15/16 Stephen Street, Sligo
F91 ADK4
Tel: +353 (0)71 931 8844
Email: info@tobin.ie

Our Ref: 11981

10th March 2026

The Secretary,
An Coimisiun Pleanála,
64 Marlborough Street,
Dublin 1
D01V902

Re: Proposed Rooaunalaghta Green Energy Project in Co. Mayo

Dear Sir/Madam,

On behalf of our client Rooaunalaghta Green Energy Limited (the prospective applicant), TOBIN hereby requests to enter into pre-application consultation with An Coimisiún Pleanála to determine the Strategic Infrastructure Development (SID) status of the proposed green energy project known as 'Rooaunalaghta Green Energy Project'. This request is made to the Coimisiún under Section 37B of the Planning and Development Act 2000, as amended (hereafter referred to as "the Act").

The following sections set out the information required by the Coimisiún to facilitate such pre-application consultations:

Agent Details (we request that all enquiries and correspondence be directed to the Agent):

TOBIN
Block 10-4, Blanchardstown Corporate Park,
Dublin D15 X98N
Contact person: John Staunton
E-mail: john.staunton@tobin.ie
Phone: +353-1-8030401

Prospective Applicant Details:

Rooaunalaghta Green Energy Limited
Address: Station Road, Adare, Co. Limerick, V940Y50
Contact person: Larry O'Halloran
E-mail: larry.ohalloran@gsdl.ie

Directors: M. Shelly (Chairman) C. McGovern (Managing Director) E. Connaughton (Company Secretary)
B. Downes D. Grehan M. McDonnell J. McGrath
B. Carroll S. Tinnelly J. O'Flaherty K. McKenna

Technical Directors: B. Gallagher B. Heaney C. Kelly T. Mackey O. Fitzpatrick P. Cloonan P. Cunningham J. Forde

Associate Directors: M. Casey E. Fenton L. Kennedy P. O'Connor B. Rudden M. Geraghty S. Ryan K. Gallagher K. Higgins J. Dillon

The prospective applicant for the proposed project is Rooaunalaghta Green Energy Limited, a subsidiary of GreenSource Sustainable Developments Limited.

Greensource is a wholly owned Irish renewable energy company based in Adare, County Limerick. The company has grown and diversified over the last twenty years, having significant expertise in the planning, construction and operation of renewable energy projects in Ireland and abroad. Since inception, the company has played a key role in the development of over 400 MW of renewable energy projects in Ireland, playing a significant role in further decarbonising the electricity market in this country.

Strategic Need for Wind Energy Development

The Climate Action Plan 2024 ('CAP 25') contains a renewable electricity generation target of 9GW of onshore wind and 80% renewable electricity share. It recognises that to meet the first carbon budget the electricity sector requires a decarbonisation rate of 17.3% per annum in the period 2023-2025. For context, the decarbonisation rate between 2018 and 2022 was 1.4% per annum. CAP 25 acknowledges the urgency and importance of decarbonising the electricity sector. It states:

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

The scale of the challenge is apparent when quantified:

"As an example, the historical average deployment of onshore wind installed capacity connected between 2008 and 2020 inclusive was ~280 MW per annum from 19 projects (with an annual maximum of 612 MW). To achieve the necessary emissions abatement, an approximately eight-times increase of renewable energy deployment to 2.3 GW annually would be needed between 2024 and 2030."

CAP 25 identifies the alignment of local and national policy as critical to accelerate renewable energy rollout:

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

While it is clear that progress is on-going, it is also apparent that there are still challenges which will need to be overcome if Ireland is to achieve its targets for renewable electricity generation. The proposed project represents an opportunity to bring forward a significant additional renewable energy source which will contribute towards achieving further decarbonisation of the electricity generation sector and will contribute towards Ireland's energy targets.

Site Location Details

The proposed site is located in the townlands of Rooaunalaghta and Cloughmoyne, County Mayo. The nearest settlements are Glencorrib, Shrulue and Headford, which lie approximately 1.4km North-west of the site, 3km North-east of the site and 4.5km South of the site, respectively.

In terms of proximity to Natura Sites, the site is hydrologically linked to the Lough Corrib Special Area of Conservation (SAC) located approximately 2.9km to the west of the site. The site also borders the Cloughmoyne SAC immediately adjacent to the west of the site.

In general terms, the area surrounding the site can be described as rural with a dispersed settlement type.



Description of Nature and Scale of Development

The proposed Rooaunalaghta Green Energy Project will consist of the following project components (these details are provisional and subject to review as part of the design and EIA processes):

- Up to 13 wind turbines (including tower sections, nacelle, hub, rotor blades) with an estimated capacity of 58.5 MW and a maximum blade tip height of 150 metres. The proposed turbine envelope and tip height will be confirmed as part of the design and EIA processes;
- The development will also include:
 - Associated hardstandings at each turbine location;
 - New access tracks and upgrading of existing access tracks;
 - Upgrading of existing drainage system;
 - Borrow pit(s);
 - 33kV Grid connection and associated works
 - 110kV “Loop-In” electricity substation and associated loop-in connection to existing OHL or potential alternative 110kV “tail-fed” substation with associated connection to a proposed third-party 110kV substation;
 - Electrical and communication cables, linking the turbines to the proposed grid connection point;
 - Related site works and ancillary works;

Legislative Context

The proposed Rooaunalaghta Green Energy Project will exceed the thresholds for completion of an Environmental Impact Assessment (EIA), as detailed in the Planning and Development Regulations 2001 (as amended), Schedule 5, Part 2, Class 3(l), which is:

“Installations for the harnessing of wind power for energy production (wind farms) with more than 5 turbines or having a total output greater than 5 megawatts”.

An EIA Report will be prepared in support of any future application for statutory consent. It is proposed that the following EIA guidelines will be followed during the preparation of the EIA Report:

- Guidelines on the Information to be contained in Environmental Impact Statements (EPA, 2002);
- Advice Notes on Current Practice in the Preparation of Environmental Impact Statement, (EPA, 2003);
- Draft Guidelines on the Information to be contained in Environmental Impact Statements (EPA, September 2015);
- Draft Advice Notes on Preparing Environmental Impact Statements (EPA, September 2015); and
- Guidelines on the information to be contained in Environmental Impact Assessment Reports (EPA, August 2022).

In addition to the Regulations and Guidelines above, the EIAR will be prepared with cognisance to the “Wind Energy Development Guidelines for Planning Authorities (2006), which are currently in force and due consideration of the “Draft Revised Wind Energy Development Guidelines (December 2019)”.

A Screening for Appropriate Assessment and a Natura Impact Statement (NIS) will also be prepared. The purpose of the AA/NIS will be to inform the consenting authority in its undertaking of an ‘Appropriate Assessment’ of the proposal, as required under Article 6(3) of the EU Habitats Directive (92/43/EC).

The proposed site lies within the functional area of Mayo County Council. It is thus affected by the provisions of the Mayo County Development Plan, 2022-2028. The development plan sets out a vision for the future growth and development of the County for the life of the plan and beyond.



The proposed site is located in an area designated as “Open to Consideration” for wind energy developments. This is described in the Mayo Renewable Energy Strategy as *“areas which may be considered for wind farms or small clusters of wind turbines but where the visual impact on sensitive or vulnerable landscapes, listed highly scenic routes, scenic routes, scenic viewing points and scenic routes will be the principal consideration. The Tier 2 classification will be reviewed by the Council following a determination by EirGrid of grid infrastructure for the County.”*

The current most relevant policies from the Mayo County Development Plan, 2022-2028 to this project are:

Table 1 – Mayo County Development Plan Policies relating to wind energy

CDP Policy / Objective	Description
REP-1	To support Ireland’s renewable energy commitments outlined in national policy by facilitating the development and exploitation of a range of renewable energy sources at suitable locations within the county, where such development does not have a negative impact on the surrounding environment (including water quality), landscape, biodiversity or local amenities to ensure the long-term sustainable growth of the county.
REP-3	To actively encourage and support the sustainable development, renewal and maintenance of energy generation infrastructure in order to maintain a secure energy supply, while protecting the landscape, archaeological and built heritage and having regard to the provisions of the Habitats Directive.
REP-4	To ensure that developers of proposed large-scale renewable energy projects carry out community consultation in accordance with best practice and commence the consultation at the initiation of project planning.
REP-5	To promote the use of efficient energy storage systems and infrastructure that supports energy efficiency and renewable energy system optimization, subject to the proper planning and sustainable development of the area and consideration of environmental and ecological sensitivities.
REP-7	To promote the harnessing of wind energy to contribute toward decarbonising County Mayo, including new emerging by-product markets.
REO-1	To co-operate with the Northern and Western Regional Assembly in identifying Strategic Energy Zones as areas suitable for larger, energy generating projects, community and micro energy production, whilst ensuring environmental constraints and a regional landscape strategy are considered.
REO-3	To encourage and facilitate, where possible, the production of energy from established and emerging renewable technologies.
REO-6	To ensure all renewable energy proposal comply with the provisions of the Mayo County Council Renewable Energy Strategy 2011-2022 (or as updated).
REO-8	To encourage the development of wind energy, in accordance with Government policy, and having regard to the Landscape Appraisal of County Mayo and the Wind Energy Development Guidelines (2006) and Mayo Renewable Energy Strategy, or any revisions there of or future guidelines, and ensure consistency with the provisions of RPO 4.16 and RPO 5.2(b) of the RSES (2020-2032).



Legal Interest in Land

Relevant legal agreements are in place for the lands for the submission of any future planning application.

Class of Development

The proposed project falls within the development thresholds specified in Class 1 'Energy Infrastructure' of the Seventh Schedule of the Planning and Development Act 2000, as amended, which states:

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.

It is anticipated that the proposed project will likely have an output of greater than 50 Megawatts.

Planning Authority

The proposed project is located largely (i.e. the entire proposed wind farm and some of the proposed Grid Connection Route (GCR)) within the functional boundaries of Mayo County Council with the eastern element of the proposed GCR and the proposed 110kV substation being within the functional boundaries of Galway County Council.

Statement as to Section 37(A) Criteria

Section 37A(2) of the Planning Act provides that the following matters be taken into account in determining whether or not a development shall be regarded as SID:

- (a) the development would be of strategic economic or social importance to the State or the region in which it would be situate,*
- (b) the development would contribute substantially to the fulfilment of any of the objectives in the National Planning Framework or in any regional spatial and economic strategy in force in respect of the area or areas in which it would be situate,*
- (c) the development would have a significant effect on the area of more than one planning authority.*

With regard to these three matters, we have considered the following:

(a) the development would be of strategic economic or social importance to the State or the region in which it would be situate.

The proposed wind farm, with an output of 58.5 MW, will constitute a significant addition to Ireland's renewable electricity supply, contributing towards Ireland's target of an additional 9 gigawatts (GW) of onshore wind capacity to be added to the national grid by 2030 as set out in the Government's *Climate Action Plan 2024*.

Due to the scale of the proposal, the project is considered to be of strategic economic and social importance to the Region and the State. The capital investment required for a project of this scale, will represent a significant economic contribution to the region, including the provision of community development funding upon commissioning of the wind farm.



(b) the development would contribute substantially to the fulfilment of any of the objectives in the National Planning Framework or in any regional spatial and economic strategy in force in respect of the area or areas in which it would be situate.

The Government's *Project Ireland 2040 - National Planning Framework* sets out the overarching policy and planning framework for the social, economic and cultural development of the country. The Plan covers a wide range of national policy objectives and National Strategic Outcomes (NSO) and in respect of the proposed project, sets out the following key objectives:

- National Policy Objective 54

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

- National Policy Objective 55

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

The proposed project is in keeping with the above objectives in terms of developing a sustainable renewable energy resource which can replace fossil fuels and contribute to a reduction in greenhouse gas emissions. The NPF is currently under review and will be monitored over the course of the proposed project.

The proposed project is also in keeping with the following objectives set out in the *Regional Spatial & Economic Strategy* (RSES) published by the Northern and Western Regional Assembly:



Table 2 – RSES Regional Policy Objectives (Wind & Renewables)

Regional Policy Objective	Description
RPO 4.17	To position the region to avail of the emerging global market in renewable energy by: ○ Stimulating the development and deployment of the most advantageous renewable energy systems; ○ Supporting research and innovation; ○ Encouraging skills development and transferability; ○ Raising awareness and public understanding of renewable energy and encourage market opportunities for the renewable energy industry to promote the development and growth of renewable energy businesses; and, ○ Encourage the development of the transmission and distribution grids to facilitate the development of renewable energy projects and the effective utilization of the energy generated from renewable sources having regard to the future potential.
RPO 4.18	Support the development of secure, reliable, and safe supplies of renewable energy, to maximise their value, maintain the inward investment, support indigenous industry and create jobs.
RPO 5.1	The Assembly will support through Climate Change Action Plans and Local Authorities the preparation and implementation of Local Climate Strategies which will, inter alia, address vulnerability to climate risks and provide prioritised actions in accordance with the guiding principles of the National Adaptation Framework.
RPO 8.1	The Assembly support the development of a safe, secure and reliable electricity network, and the transition towards a low carbon economy centred on energy efficiency and the growth projects outlined and described in this strategy.
RPO 8.3	The Assembly support the necessary integration of the transmission network requirements to allow linkages with renewable energy proposals at all levels to the electricity transmission grid in a sustainable and timely manner.

(c) the development would have a significant effect on the area of more than one planning authority.

The proposed wind farm site is located entirely within the administrative area of Mayo County Council.

A number of options will be considered in relation to turbine delivery routes, and these will be assessed by the project team as part of the EIA process.

The current proposed grid connection is located within the functional boundaries of Mayo and Galway County Councils, with the proposed 110kV substation being proposed within the functional boundaries of Galway County Council.

RED III Directive

The EU RED III Directive (EU/2023/2413) entered into force on 20 November 2023 and has been transposed into Irish legislation by way of European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. 274 of 2025). We anticipate that the proposed Rooaunalaghta Green Energy Project will fall under the scope of these regulations and will be considered a REDIII



development. We understand that the pre-application consultation request process will remain as it currently operates under the provisions of the Planning and Development Act, 2000 as amended.

Section 37B(3) of the Act provides that:

In any consultations under subsection (1), the Board may give advice to the prospective applicant regarding the proposed application and, in particular, regarding—

- (a) whether the proposed development would, if carried out, fall within one or more of paragraphs (a) to (c) of section 37A(2),*
- (b) the procedures involved in making a planning application and in considering such an application, and*
- (c) what considerations, related to proper planning and sustainable development or the environment, may, in the opinion of the Board, have a bearing on its decision in relation to the application.*

Having regard to the new completeness check requirement and the provisions of both subsections (b) and (c) above, the information and documentation required to facilitate the completeness check to process the application will form part of the discussion and advice provided in the pre-application process.

Conclusion

Based on the information provided herein, we are seeking to initiate the consultation process with An Coimisiún Pleanála with a view to determining whether the Rooaunalaghta Green Energy Project' is a Strategic Infrastructure Development. The applicant and the project team, led by TOBIN, are available to meet with the Coimisiún and to present the details of the project at your convenience.

A payment (via Electronic Funds Transfer) for the statutory fee of €4,500 for this pre-application consultation has been arranged between the applicant and An Coimisiún Pleanála. Should there be any query in relation to the payment, please do not hesitate to contact the undersigned. We understand that this matter will not be progressed until payment has been confirmed.

We look forward to your response in due course.

Yours sincerely,



John Staunton

for and on behalf of TOBIN (Agent)

