Planning and Environmental Consultants

Planning Report

Cahermurphy West Wind Farm and Grid Connection, Co. Clare

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1. INTRODUCTION

This Planning Report been prepared by MKO on behalf of Cahermurphy Renewables Designated Activity Company (the Applicant), who intend to apply to An Coimisiún Pleanála (ACP) for planning permission under sections 37E and 182A of the Planning and Development Act 2000 (as amended) (the "PDA") to construct a wind energy development known as Cahermurphy West Wind Farm at Cahermurphy and adjacent townlands, located in Co. Clare. The Proposed Project is being brought forward in response to local, national, regional and European policy regarding Ireland's transition to a low carbon economy and associated climate change policy objectives

The proposed Cahermurphy West wind farm will comprise 8 No. turbines with a limited tip height range of 180 metres to 185 metres and all associated foundations and hardstanding areas, access roads and entrance(s) including upgrade of existing site roads and provision of new roads, 110kV electrical substation and wind farm control building, underground cabling, 2 no. borrow pits, electrical cabling for 110kV grid connection, biodiversity enhancement areas, 2 no. temporary construction compounds, peat and spoil management and a permanent meteorological mast. A full description of the Proposed Project is available in Chapter 4 of the accompanying Environmental Impact Assessment Report (EIAR).

The Cahermurphy West Wind Farm will be henceforth referred to using the following terminology, as defined in Chapter 1 of the EIAR and summarised below:

- Where the 'Proposed Project' is referred to, this relates to all the project components described in detail in Chapter 4 of the EIAR i.e. Proposed Wind Farm and Proposed Grid Connection as detailed below.
- Where 'the Site' is referred to, this relates to the primary study area for the EIAR, as delineated by the EIAR Site Boundary in green as shown on Figure 1-1 of the EIAR.
- Where the 'Proposed Wind Farm' is referred to, this refers to turbines and associated foundations and hard-standing areas, meteorological mast, site entrance, junction accommodation works, access roads, accommodation works along the turbine delivery route (TDR Works), temporary construction compounds, temporary transition compound, 110kV electrical substation, underground cabling, borrow pits, site drainage, tree felling, biodiversity management and enhancement measures and all ancillary works.
- Where 'Proposed Grid Connection' is referred to, this refers to the underground 110kV electrical cabling and all associated site development works connecting the Proposed Wind Farm to the existing Moneypoint 110kV electrical substation in the townlands of Carrowdotia South and Carrowdotia North, Co. Clare.

The purpose of this Planning Report is to outline the background to the Proposed Project, the key elements of the proposal and to demonstrate that it complies with all relevant planning policy provisions and is in accordance with the proper planning and sustainable development of the area. This Planning Report provides a comprehensive assessment of the Proposed Project's consistency with the relevant planning policy framework at European, national, regional and local levels.

This planning application for the Proposed Wind Farm is being submitted directly to ACP as a Strategic Infrastructure Development (SID) in accordance with Section 37E of the PDA. The Proposed Wind Farm will have an estimated total generating capacity of greater than 50MW and therefore meets the threshold for wind energy set out in the Seventh Schedule of the Planning and Development Act 2000, as amended (being *'An installation for the harnessing of wind power for energy production (a wind farm) with more than 25 turbines or having a total output greater than 50 megawatts'*). This approach has been confirmed following consultations with ACP under the provisions of Section 37B of the Planning and Development Act 2000 as amended (Case Reference ABP-319676-24).

A design flexibility opinion issued by ACP (Case Reference ACP-323567-24) on 5th February 2025 accompanies the Proposed Wind Farm application. The details unconfirmed in this application are the turbine tip height, rotor diameter and hub height. The range of parameters under which the turbine

dimensions will fall are specified on the site notice and in the design flexibility opinion that accompanies this application.

A separate planning application for the Proposed Grid Connection works will be submitted to ACP in accordance with Section 182A of the Planning and Development Act 2000, as amended as it is considered that both the components and function of the Proposed Grid Connection fall within the scope of Section 182A (1) of the PDA, based upon the definition of electricity transmission as set out in Subsection 9 of Section 182A. (Case Reference ABP-315645-23)

The Proposed Project is strongly supported by European and national policy and legislation. At a European Union (EU) level the Proposed Project is supported by the EU Renewable Energy Directive and REPowerEU. The planning application for the Proposed Wind Farm has been prepared in line with the EU Renewable Energy Directive (RED III) and, specifically, the Schedule of Information to Inform the Completeness Check, provided by ACP, as Appendix 2 of their SID determination under ABP-319676-24. A full assessment of the Proposed Wind Farm in relation to this schedule has been included as an appendix to the cover letter included as part of the Proposed Wind Farm application.

At a national level, the Proposed Project is supported by the National Planning Framework First Revision, Climate Action Plan 2025, the National Energy Security Framework, among other national climate and energy policies. The legally binding greenhouse gas emission reduction target and the obligations of public bodies under the Climate Action and Low Carbon Development (Amendment) Act 2021 (the Climate Act) should also be considered in the assessment of these applications.

The development of viable sites for wind energy developments is essential to meet European, national and local climate and renewable energy targets. Ireland needs to scale up onshore wind energy development at an unprecedented rate to achieve our 9GW and 80% RES-E target set out in the Climate Action Plan 2025 (CAP 25). If permitted, the Proposed Wind Farm could add between 50.4MW and 57.6MW of installed, renewable, clean energy to our national wind energy capacity. This will not only contribute to the decarbonisation of the electricity sector but will play a role in the decarbonisation of other sectors and the transition to a low-carbon, climate resilient economy.

Based on the analysis set out in this Planning Report, it is considered that the Proposed Project is strongly supported by European, national, regional, and local planning policy and will contribute to national and local renewable energy targets.

1.1 Report Structure

Section 1 – Provides an introduction to the Proposed Project.

Section 2 – Outlines the Proposed Project Background.

Section 3 – Provides a Description of the Proposed Project.

Section 4 – Details Proposed Project Design Process and Constraints Analysis.

Section 5 – Provides an overview of the relevant national, regional and local planning policy.

Section 6 – Provide an overview of S.15 of the Climate Act.

Section 7 – Provides a Planning Assessment of the Proposed Project.

Section 8 – Provides a Concluding Statement.

2. PROPOSED PROJECT BACKGROUND

2.1 The Applicant

The Applicant for the Proposed Project is Cahermurphy Renewables Designated Activity Company (DAC). Cahermurphy DAC is a joint venture between FuturEnergy Ireland and Mid Clare Renewable Energy (MCRE) Ltd. FuturEnergy Ireland are an Irish-owned, joint venture company with Coillte and ESB, which launched in November 2021.

FuturEnergy Ireland's ambition is to develop more than 1GW of renewable energy capacity by 2030 and make a significant contribution to Ireland's commitment to produce 80% of electricity from renewable sources by the end of the decade. Using their knowledge and expertise, FEI aim to develop wind farms in a responsible manner with the support of local host communities thereby enabling Ireland, and its people, to combat climate change and contribute to a better, brighter world.

MCRE Ltd is a 100 percent Irish owned company, owned by shareholders based in county Clare. The local ownership and local involvement are both seen as an important features in community acceptance of such renewable energy projects. These local shareholders are also the developers and operators of the adjacent Cahermurphy 1 wind farm. Cahermurphy 1 was successfully planned with the assistance of MKO between 2014-2019 and was built and brought into operation in 2020, demonstrating the suitability of this area for onshore wind development.

2.2 Site Location and Context

The Proposed Wind Farm site is located within a rural setting in County Clare, approximately 5km north of Kilmihil, 4km east of Creegh, and approximately 25km southwest of Ennis, See **Figure 1**. There are five Natura 2000 sites listed in the Identification of European Sites within the likely zone of influence of the Proposed Wind Farm and details of these are set out in Section 4.1 in the NIS. The townlands within the planning application red line boundary are listed below in **Table 1**.

The Proposed Grid Connection includes for 110kV underground cable between the proposed on-site substation and the existing 110kV GIS substation building located within the 110kV ESB Moneypoint substation.

Current land-use on the Proposed Wind Farm site predominantly comprises of forestry, bogland, pastureland and tracks. Current land-use along the proposed Grid Connection comprises of agricultural pastures, one-off housing and commercial forestry. Land-use on the wider landscape comprises a mix of agriculture, wind farms, commercial forestry and low-density residential properties.

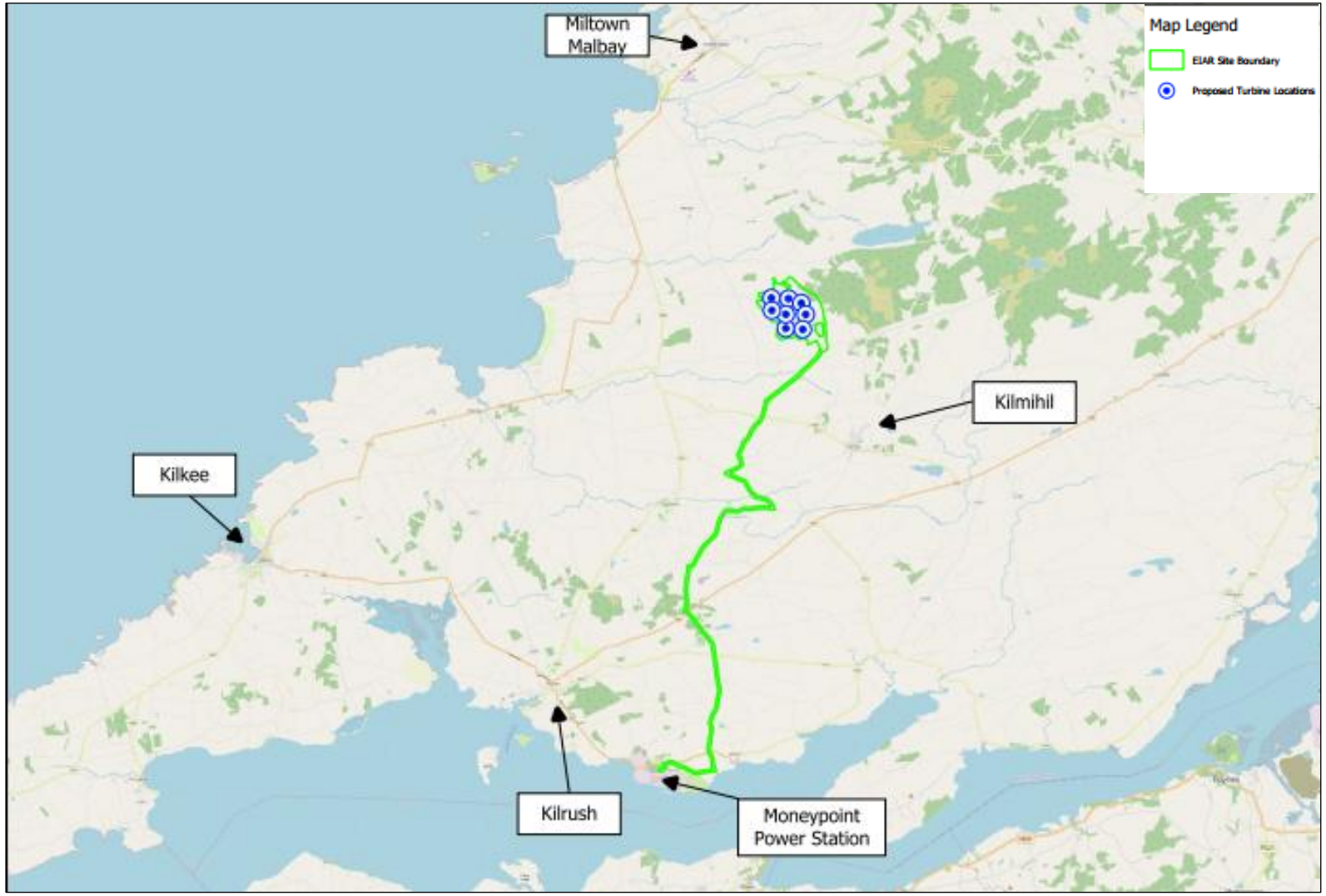


Figure 1 Site Location Context

Table 1: Townlands within the planning applications red line boundary

Proposed Project Element	Townland
Proposed Wind Farm	Cahermurphy, Carrowmagry South, Castlepark, Caheraghacullin, Doolough, Drummin, Kilmihil, Knockalough, Knocknahila More South.
Proposed Grid Connection	Cahermurphy, Cloonwhite South, Sheeaun, Leitrim, Cloonreddan, Kilmacduane East, Clooncullin, Lissanair, Teernagloghane, Brisla East, Brisla West, Gowerhass, Tullagower, Garraunnatooha, Knockerry West, Carrowfree, Derrylough, Dunneill, Doonnagurroge, Poulnadarree, Carrowdotia South, Carrowdotia North.

2.3 Planning History

A planning search was carried out through Clare County Council's online planning portal along ACP online case search function in March 2026 for planning applications within the red line boundary of both planning applications within the past 10 years. The relevant planning applications are outlined in **Table 2** below.

Table 2: Planning History of Proposed Project planning application boundary

Pl Ref.	Description	Decision
20658 PL03.318525	For the development of a windfarm in the townlands of Cahermurphy, Knocknahila More South, Carrownagry South, Caheraghacullin and Drummin, together with the development of an underground grid connection cable to the National Grid in the townlands of Cahermurphy, Drummin, Doolough, Glenmore, and Booltiagh. The development will consist of 1. Construction of up to 10 no. wind turbines with a maximum overall blade tip height of up to 170 metres and associated hard strand areas. 2. 1 no. permanent meteorological mast with a maximum height of up to 100 metres. 3. 1 no. 38kV permanent electrical substation which will be constructed at one of two possible locations on site: either Option A in Carrownagry South townland or Option B in Cahermurphy townland. The application is seeking a ten-year planning permission and 30-year operational life from the date of commissioning of the wind farm. An Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS) have been prepared in respect of the proposed development	On appeal with ACP
19159	for an amendment to a previously permitted Wind Farm in the townland of Cahermurphy, Kilmihil, Co. Clare (Clare County Council Pl. Ref. P14-551, An Bord Pleanála PL03.2245189)A ten-year planning permission is sought for the proposed development which will amend the height of the	Granted by CCC on 30/05/2019

	turbine no. 3 only of the previously permitted Cahermurphy Wind Farm. The proposed development will consist of the provision of a larger wind turbine with a tip height of up to 150m (increase in tip height of 19m from the previously approved 131 m turbine) at the previously permitted location of turbine no. 3 and associated site works	
14551/ PL03.245189	For a ten-year planning permission to construct a windfarm and all associated infrastructure in the townland of Cahermurphy, Kilmihil. The proposed windfarm will comprise a)the provision of a total of 4 No. wind turbines, with a maximum ground to top blade tip height of up to 131m, b) upgrading of existing and provision of new internal access roads, c) provision of a wind anemometry mast (up to 90m in height), d) borrow pit, e) an electricity sub-station with control rooms The current proposed development is intended to replace an existing planning permission for a six-turbine wind farm development permitted under Pl. Ref. 03-2071, as extended by Pl. Ref. 09-267 and pl. Ref. 13-507 which is valid until 2019. This application is accompanied by an Environmental Impact Statement (EIS) and Natura Impact Statement (NIS)	Refused by CCC on 25/06/2015, Granted by the Commisison on 28/07/2016
24292	For the development which will consist of a new slatted house	Granted by CCC on 31/10/2024
19250	To RETAIN the following: a) Increased floor area to existing dwelling, also including front porch and rear extension, b) All associated elevational changes, c) Revised boundaries, house location and finish floor level, plus all ancillary site works	Granted by CCC on 29/06/2019
23599	To refurbish and extend the existing dwelling and install a wastewater treatment system & all other associated site and ancillary works	Granted by CCC on 05/03/2024
2360039	The development will consist of the construction of a 68sqM single storey Granny Flat Extension and shared link to the existing two storey dwelling, with associated site works	Granted by CCC on 29/09/2023
2381	To RETAIN, revise and complete domestic garage to rear of existing dwelling plus all ancillary site works	Granted by CCC on 18/05/2023
2360324	To construct an additional 280m uncovered running track on to the existing 120m covered running track and to develop a grass training pitch to include flood lights and all associated site works and services	Granted by CCC on 04/06/2024
17851	To construct a new 120 meter long covered 4 lane sprint track and a new toilet building along with all associated site works to include a new septic tank and percolation area; and (b) RETENTION permission to retain change of use of former dwelling to recreational changing facilities and RETENTION permission to retain existing 30 no. street type lights around perimeter of existing 1km walking track	Granted by CCC on 09/02/2018

22902	To demolish part of existing dwelling, to extend existing dwelling and connect to proposed foul sewerage plant and percolation area	Granted by CCC on 11/01/2023
2660074	to construct a single storey extension to derelict dwelling, to alter existing ground floor plan & elevations, all associated necessary ground works, install new foul sewerage system/percolation area and new site entrance	New application, decision due date 09/04/2026
18685	To construct a private garage along with all associated works	Granted by CCC on 19/11/2018
19909	To construct a private garage along with all associated works	Granted by CCC on 21/02/2020
22133	Retention of the existing entrance to the east of their property, and for PERMISSION to: Alter/improve the existing entrance, to include a new field entrance adjacent to it and to build up the existing entrance to the west of their property and all associated site and ancillary works	Granted by CCC on 30/08/2022
19891	To construct dwelling house, garage, carport with loft, treatment system and provide new entrance to public road	Granted by CCC on 01/06/2020
2560068	For alterations, front extension and change of use of part of existing domestic garage to a granny flat accommodation, along with ancillary works	Granted by CCC on 20/05/2025
18200	To construct an extension to the west side of existing dwelling house with ancillary works	Granted by CCC on 09/06/2018
19500	To construct a new dwelling house and garage complete with a new entrance, sewage treatment system and ancillary works	Granted by CCC on 14/10/2019
21773	For the demolition of a derelict roadside cabin, construction of a new dwelling house, private garage, new entrance, sewerage and water facilities and all necessary associated works	Granted by CCC on 23/11/2021
2360193	For the following development to the existing dwelling at the above address: (a) modifications to front entrance porch; (b) to construct a single storey extension to side and rear of the existing dwelling, to include revised internal layout; and (c) to upgrade existing attic space including provision of access stairs and 2 no. additional roof windows, along with all associated ancillary site works .	Granted by CCC on 05/09/2023
2360107	To refurbish, alter and extend an existing dwelling house along with all associated works	Granted by CCC on 28/06/2-23
21441	For the construction of a sunroom to the side of an existing dwelling, construction of a domestic and alterations to the house granted under P8-14484 along with all associated works	Granted by CCC on 10/08/2021
211161	To modify, convert and extend 2 no existing agricultural buildings to residential accommodation, install a proprietary	Granted by CCC on 12/04/2022

	wastewater treatment plant with percolation area and associated ancillary site works	
16386	Retention Permission for existing sheds and existing retaining wall at rear of dwelling house, retention permission for existing retaining wall in yard at rear of existing dwelling house (Dwelling House and Garage as granted under planning ref P04-1381), and planning permission to complete proposed machinery storage shed/agricultural shed in yard, Permission to complete new low boundary wall between garden and existing driveway, including permission for proposed landscaping, including all ancillary site works, development accessed using existing entrance (as granted under planning ref P13-316)	Granted by CCC on 06/08/2016
2331	Of extensions and revised elevations to dwelling house	Granted by CCC on 13/04/2023
24246	To change the design and the location on site of the proposed dwelling house authorised under planning permission P20-440 with all necessary ancillary services	Granted by CCC on 22/10/2024
20440	To construct a new dwelling house and private garage with new wastewater treatment system with all necessary ancillary works	Granted by CCC on 18/12/2020
2460542	To construct a new dwelling house, private garage, site entrance, on-site wastewater treatment system and all associated site works and services	Granted by CCC on 25/03/2025
20668	To erect extension to dwelling house include first floor living area.	Granted by CCC on 18/12/2020
2560314	To construct a new dwelling house, private garage, site entrance, on-site wastewater treatment system and all associated site works and services	Granted by CCC on 27/08/2025
17809	For development which will consist of two water storage tanks above ground level and an underground pump chamber located within the Moneypoint generating station complex.	Granted by CCC on 22/01/2018
2322	For development within the Moneypoint Generating Station, Carrowdotia North and Carrowdotia South, Kilimer, County Clare (Eircode V15 R963) which is licenced by the Environmental Protection Agency (EPA) under an Industrial Emissions (IE) Licence (Ref P0605-04) and and Upper tier COMAH site and therefore falls under the requirements of the Control of Major Accident Hazard Regulations (COMAH) Regulations, 2015. The development, which will be located at various locations within the station complex, will consist of land based site Investigation (SI) works comprising of boreholes and trial pits across the site	Granted by CCC on 18/04/2023
16257	To construct a slatted unit with an underground slurry storage tank for housing livestock	Granted by CCC on 21/06/2016

24238	Of the following: front, rear and gable extensions to existing dwelling with minor elevational changes, 2 No. existing domestic sheds, front boundary/access treatment plus all ancillary site works	Granted by CCC on 22/10/2024
23421	Of the following a) the front porch and rear extension along with additional window/rooflight and changes to windows of the dwelling house. b) first floor storage area and additional windows/door/rooflights of the garage along with associated site works	Granted by CCC on 24/10/2023

The planning history search also identified wind energy development applications within 25km of the proposed turbines, 19 no. wind energy development were found, further detail on the wind energy developments identified is outlined in Appendix 2-2 of the EIAR.

2.4 Pre-Application Consultation

This section of the Planning Report outlines the pre-application consultation undertaken by the Applicant for the Proposed Project. This includes Scoping as part of the EIAR, pre-application meetings with Clare County Council, and extensive consultation with the local community.

2.4.1 EIAR Scoping

An EIAR scoping document, providing details of the Proposed Project was prepared by MKO and circulated to prescribed statutory and non-statutory bodies in April 2024. As part of this process constraints mapping was undertaken, which is detailed in Chapter 3, Section 3.6.1 of the EIAR. The scoping document provided details of the Proposed Project and set out the scope of work for the EIAR. Consultees were invited to contribute to the EIAR by suggesting baseline data, survey techniques and potential impacts that should be considered as part of the assessment process and in preparation of the EIAR.

Copies of all scoping responses received are included in Chapter 2, Section 2.7 of the EIAR. If further responses are received, the comments of the consultees will be considered, where applicable, in the construction, operation and decommissioning of the Proposed Project in the event of a grant of planning permission. The recommendations of the consultees have informed the scope of the assessments undertaken and the contents of the EIAR.

2.5 Pre-Planning Meetings

2.5.1 Clare County Council

Members of the project team and the Applicant met with representatives from Clare County Council in accordance with Section 247 of the PDA via MS teams on the 6th November 2024.

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

- An introduction to the Applicant.
- A high-level overview of the Proposed Project, the Subject Site and the reasons for refusal of Cahermurphy II Wind Farm.
- Overview of relevant planning policy including compliance with local wind energy policy.

- Provided specific details of the scheme relating to LVIA, Ecology and Aviation.
- Set out the scope of the Environmental Impact Assessment Report to be undertaken.
- Discussed scoping & pre-application/public consultation undertaken to date.
- Set out the projected project timelines.

2.5.2 An Coimisiún Pleanála

2.5.2.1 Section 37B Consultation

The Applicant engaged with ACP as to whether the Proposed Project would meet the thresholds of the Seventh Schedule of the PDA. The Applicant opened consultations with ACP in August 2024 in relation to a Proposed Project comprising of 8 no. wind turbines and associated infrastructure in the townland of Cahermurphy in Co. Clare and an on-site substation and associated works, including underground cabling to connect to the National Grid.

A SID meeting under the provisions of Section 37B of the PDA was held with ACP on the 11th of August 2024.

A second pre-application meeting took place on the 2nd December 2025, in response to the transposition of the Renewable Energy Directive (RED III) into Irish law through the European Union (Planning and Development) (Renewable Energy) Regulations 2025, with its provisions commencing on the 6th August 2025.

On the 9th of February 2026, ACP wrote to the Applicant and confirmed that consultation was closed and that the Wind Farm Site was considered to be SID within the meaning of Section 37A of the PDA and such any application for approval of the Proposed Wind Farm should be made directly to ACP.

2.5.3 Section 182E Consultation

The Applicant engaged with ACP under the provisions of Section 182E of the PDA and a meeting was held in August 2023. This was in respect of the construction of proposed 110kV Infrastructure and Connection at the Existing 400kV Moneypoint Substation in relation to Cahermurphy West Wind Farm.

A second meeting was also held in September 2024 with ACP where the design team gave an overview of the Grid Connection element of the Proposed Project in the form of a PowerPoint presentation.

On the 27th November 2025 ACP wrote to the Applicant and confirmed that consultation was closed and that any application for approval of the transmission development should be made directly to ACP.

2.5.4 Section 37CC(1) Consultation

The Applicant also engaged with ACP under Section 37CC(1) of the PDA, in respect of design flexibility to be included in the application (as defined in 15I of the Planning and Development Regulations 2001, as amended ("the Regulations") as an "opinion on unconfirmed details"). This flexibility meeting request was made in accordance with the recently commenced (S.I No. 645 of 2023) legislative provisions relating to design flexibility introduced by the Planning and Development, Maritime and Valuation (Amendment) Act 2022. The legislation provides for a process whereby prospective applicants may request a meeting with ACP for the purpose of receiving an opinion as to whether it is appropriate that an application for permission be made before certain details of a project are confirmed.

A meeting under Section 37CC(1) Consultation was held with ACP on the 2nd December 2025 (Case Reference ACP Ref. 319676-24). The design team gave an overview of the details unlikely to be confirmed at application lodgement, which were set out as follows:

- Turbine total tip height
- Turbine rotor diameter
- Turbine hub height

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

- Total tip height range of 180m – 185m
- Rotor diameter range of 149m – 163m
- Hub height range of 98.5m to 110.5m

It was also explained to ACP that the design flexibility requirement arises as the exact make and model of the turbine cannot be confirmed prior to making the application as this will be dictated by a competitive tender process of the various turbines on the market at the time of procurement and construction, which necessitates the requirement for associated unconfirmed details to be included in the application.

A design flexibility opinion was issued by ACP on the 9th of February 2026 and accompanies the Wind Farm application. The details unconfirmed in this application are the turbine tip height, rotor diameter and hub height. The range of parameters under which the turbine dimensions will fall are specified on the site notice and in the design flexibility opinion that accompanies this application.

2.5.5 Community Consultation

The Applicant has undertaken extensive consultation with the local community. A Community Liaison Officer (CLO) has been appointed as the point of contact for the Proposed Project and continues to engage with the local community. The purpose of the CLO is to introduce the Proposed Project to the local community, engage and establish a line of dialogue with the local community and provide a single point of contact for the community to seek information about the proposal as required. Contact details were provided for local residents to get in touch with the CLO regarding any queries or comments regarding the design and assessment of the Proposed Project.

A Community Consultation Report has been prepared to accompany the planning application and is included at **Appendix 2-4** of the EIAR. In summary, the Public Consultation Report was prepared to record the consultation carried out with the local community in respect of the Proposed Project. The objective of the consultations was to ensure that the views and concerns of all were considered as part of the Proposed Project design and Environmental Impact Assessment process. The Community Engagement Report outlines the consultation and community engagement initiatives undertaken by the Applicant prior to the submission of the planning application. It also outlines the main issues identified during this process, how the final proposal reflects community consultation and the steps taken to ensure that the Proposed Project will be of enduring economic benefit to the communities concerned.

2.6 RED III – Completeness Check

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

The planning application for the Proposed Wind Farm has been prepared in line with the EU Renewable Energy Directive (RED III) and, specifically, the Schedule of Information to Inform the Completeness Check, provided by ACP, as Appendix 2 of their SID determination under ABP-319676-24. A full assessment of the Proposed Wind Farm in relation to this schedule has been included as an appendix to the cover letter included as part of the Proposed Wind Farm application.

3. PROPOSED PROJECT DESCRIPTION

3.1 Proposed Project Description

An Coimisiún Pleanalá – Planning Notice Project Description – Proposed Wind Farm

The proposed development will comprise:

i. *Construction of 8 no. wind turbines with a blade tip height range from 180m to 185m inclusive, a hub height range from 98.5m to 110.5m inclusive and a rotor diameter range from 149m to 163m inclusive with associated foundations, hard-standing and assembly areas;*
ii. *Construction of 1 no. permanent 110 kV electrical substation including 2 no. control buildings lightening protection, welfare facilities, car parking, and all associated electrical plant and apparatus, security fencing, external lighting, underground cabling, wastewater holding tank and all associated infrastructure, apparatus and landscaping;*
iii. *Underground electrical cabling (33kV) and communications cabling connecting the wind turbines to the proposed on-site 110kV electrical substation and associated ancillary works;*
iv. *Erection of 1 no. Meteorological Mast of 100m metres above existing ground level for the measuring of meteorological conditions, including a lightning rod which will extend above the mast;*
v. *Construction of new permanent access roads and upgrade of existing roads to provide access within the site and to connect the wind turbines and associated infrastructure;*
vi. *Upgrade of 1 no. new existing agricultural/forestry access to the site, off the L6254 local road, to serve as the sole entrance to the wind farm during its operational phase and to facilitate the delivery of the construction materials and turbine components to site during the construction and operational phases (including the installation of security fencing and gates);*
vii. *Development of 2 no. borrow pits;*
viii. *Construction of 2 no. temporary construction compounds and associated ancillary infrastructure including temporary site offices, staff facilities and car-parking areas, all to be removed at end of construction phase;*
ix. *Temporary works at 6 no. locations along the N68 national road, R484 regional road and L-2074, L-2082 and L-2048 local roads associated with the facilitation of turbine component and abnormal load delivery to site. These works will primarily include the trimming of vegetation and strengthening of road verges;*
x. *Permanent and temporary Site Drainage;*
xi. *Operational Stage Site Signage;*
xii. *Ancillary forestry felling over an area of 21.87ha to facilitate construction and operation of the proposed development;*
xiii. *Biodiversity enhancement measures including the permanent removal of commercial forestry (deforestation) over an area of 56.3ha and restoration of farmland habitat to good quality hen harrier foraging habitat through diversifying the range and extent of habitats over an area of 67.4ha, and;*
xiv. *All related site works and ancillary development including landscaping considered necessary to facilitate the proposed development.*

A ten-year permission and a thirty five-year operational life from the date of full commissioning of the entire wind farm is being sought and the subsequent decommissioning.

The Proposed Wind Farm layout is illustrated in **Figure 2.**

An Coimisiún Pleanalá – Planning Notice Project Description – Proposed Grid Connection

The proposed development will comprise:

i. *The provision of c.25km of underground electrical cabling (110kV) from the proposed Cahermurphy West Wind Farm development to the existing Moneypoint 110kV electrical substation to facilitate a connection to the national grid;*
ii. *Provision of 36 no. joint bays, communication chambers and earth sheath links along the proposed underground electrical cabling route;*
iii. *Permanent and temporary Site Drainage;*
iv. *Reinstatement of land, road and track surface above the proposed cabling trench;*
v. *All related site works and ancillary development considered necessary to facilitate the proposed development.*

A ten-year planning permission is being sought.

The Proposed Grid Connection layout is illustrated in **Figure 3.**

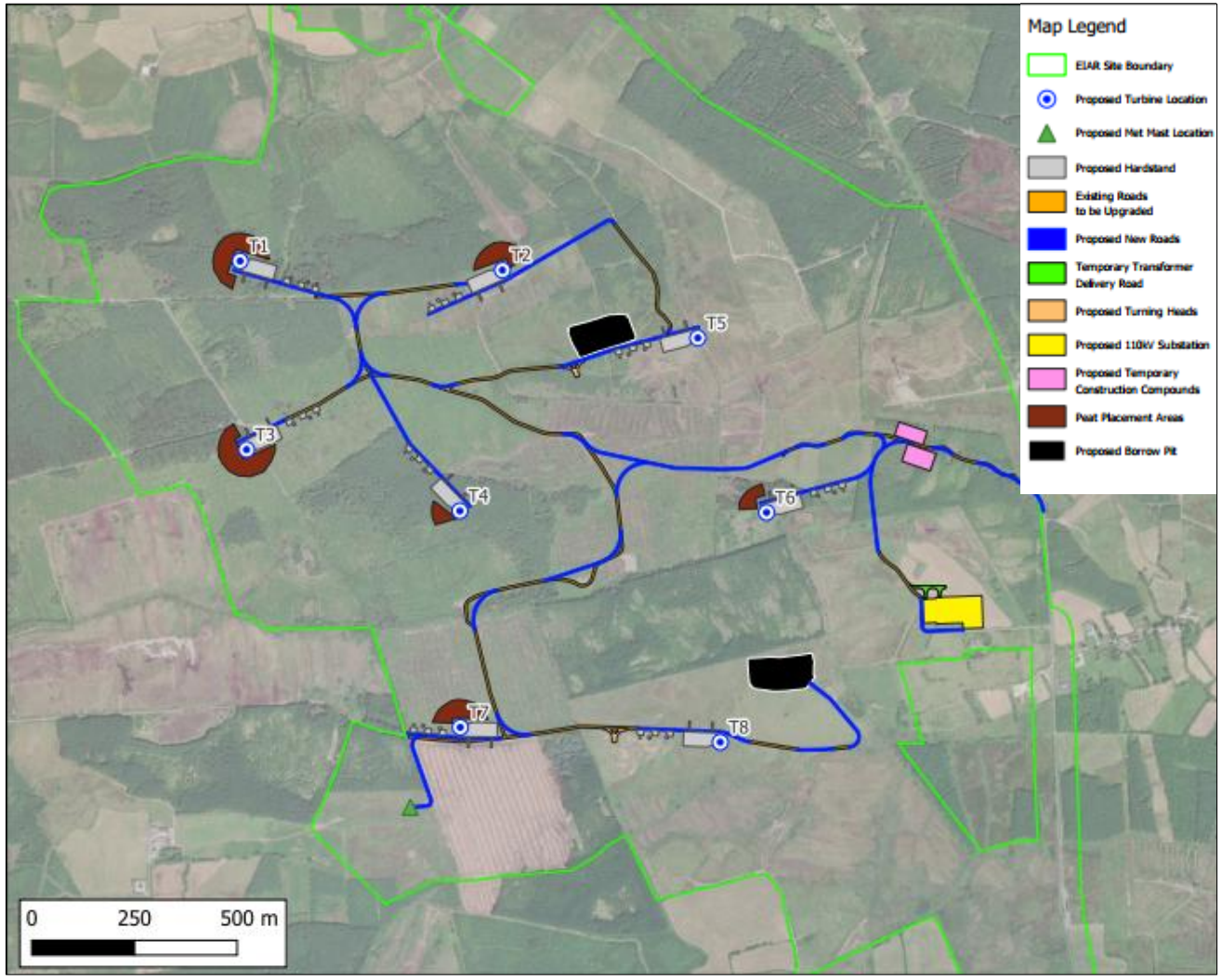


Figure 2 Proposed Wind farm Layout

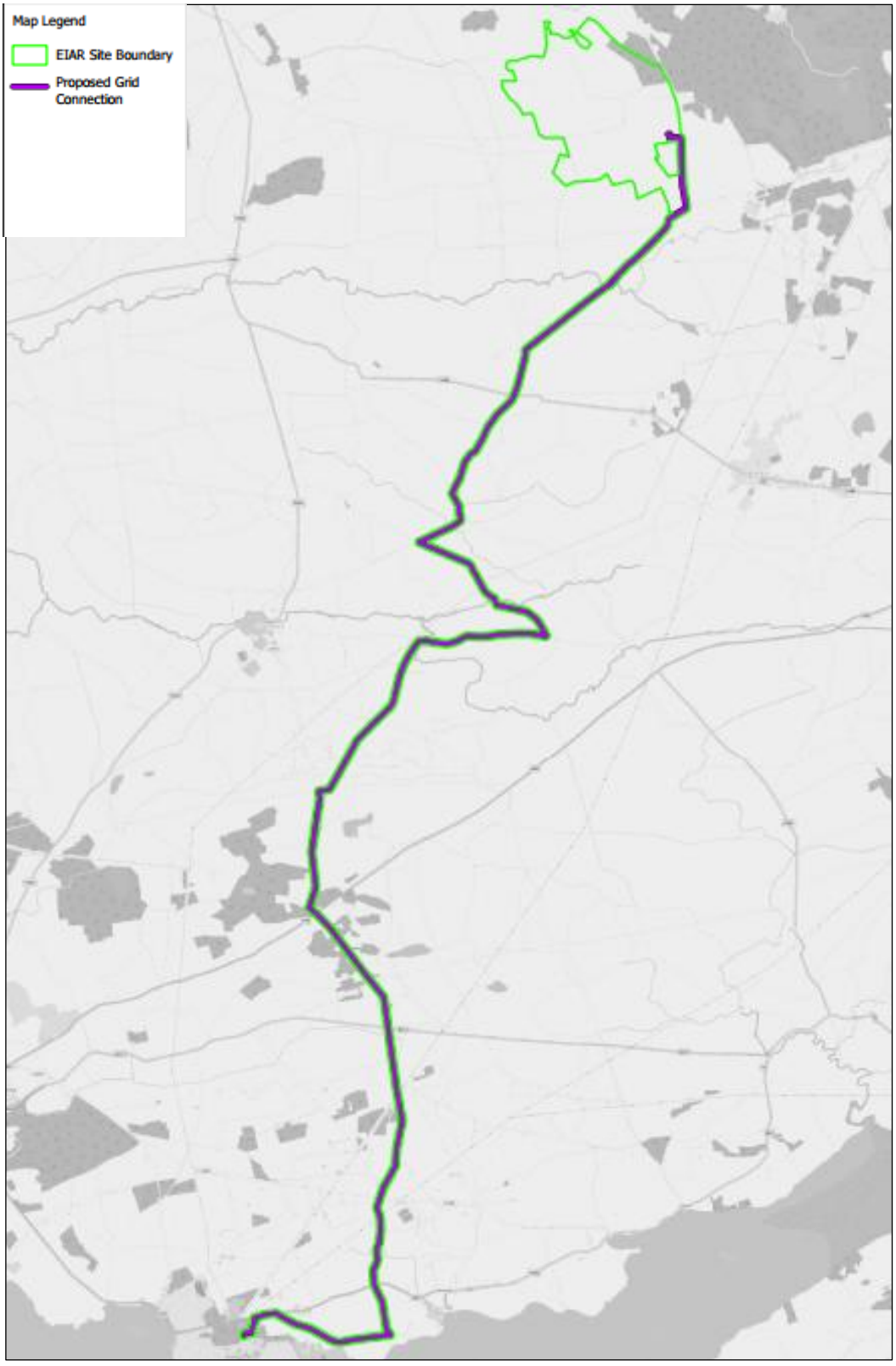


Figure 3 Proposed Grid Connection Layout

3.2 Proposed Project Design Components

(i) Turbines, Foundations & Hardstands

The proposed turbines will fall within the following range of dimensions and parameters:

- Total tip height range of 180m – 185m
- Rotor diameter range of 149m – 163m
- Hub height range of 98.5m to 110.5m

A design flexibility opinion issued by ACP (Case Reference ACP-323567-24) on 9th February 2025 accompanies the Proposed Wind Farm application. The Opinion confirms that the inclusion of this these range of parameters as part of the Proposed Wind Farm application is appropriate.

Each wind turbine is secured to a reinforced concrete foundation that is installed below the finished ground level. Hard standing areas consisting of levelled and compacted hardcore are required around each turbine base to facilitate access, turbine assembly and turbine erection.

The final turbine selection will be the subject of a competitive tender process to determine the turbine manufacturer. The wind turbines will be conventional three-blade turbines, that will be geared to ensure the rotors of all turbines always rotate in the same direction. The turbines will be multi-ply coated to protect against corrosion, and it is proposed that the turbines would be of a light grey colour to blend into the sky background to minimise visual impact.

(ii) Permanent 110kV Electricial Substation

It is proposed to include the provision of a 110kV electricity substation as part of the Proposed Project. The footprint of proposed onsite electrical substation compound measures approximately 16,571 square metres and will include 2 no. wind farm control buildings and the electrical substation components necessary to consolidate the electrical energy generated by each wind turbine, and export that electricity from the wind farm substation to the national grid. The onsite substation will be a permanent development under the ownership of the ESB/EirGrid.

The substation compound will be surrounded by an approximately 2.6-metre-high steel palisade fence, and internal fences will also segregate different areas within the main substation.

(iii) Underground electrical cabling (33kV) and communications

Each proposed turbine and the meteorological mast will be connected to the on-site 110kV substation via underground 33kV electricity cabling. Fibre-optic cables will also connect each wind turbine to the wind farm control building in the onsite 110kV electrical substation compound. The electrical and fibre-optic cables running from the turbines to the onsite substation compound will be run in cable ducts approximately 1.3 metres below the ground surface, in the roadways. The route of the cable ducts will follow the access track from each turbine location to the proposed onsite 110kV electrical substation and are visible on the site layout drawings included in Chapter 4 of the EIAR Report.

(iv) Met Mast

One permanent meteorological mast is proposed as part of the Proposed Project. The meteorological mast will be equipped with wind monitoring equipment at various heights. The mast will be a self-supporting slender structure 100 metres in height with a lightning mast on top. The mast will be

constructed on a hard standing area measuring 14m by 21m and accommodate the crane that will be used to erect the mast.

(v) Construction of access roads and upgrade of existing roads

To provide access within the Proposed Wind Farm site and to connect the wind turbines and associated infrastructure existing tracks will need to be upgraded and new access roads will need to be constructed.

The Proposed Wind Farm Site makes use of the existing Wind Farm site road network insofar as possible. It is proposed to upgrade 4.5 kilometres of existing roads and tracks, and to construct 5.4 kilometres of new access road on the Proposed Wind Farm site. Areas such as wide junctions and proposed hardstands will also be used as passing bays throughout the construction phase of the proposed Wind Farm.

(vi) Upgrade of Existing Agricultural Access

It is proposed to upgrade the existing agricultural access to the site, from the sole entrance of the wind farm, facilitate the delivery of the construction materials and turbine components to site during the construction and operational phases. Certain procedures that are to be included in the construction to avoid any adverse impact on peat stability.

(vii) Borrow Pits

It is proposed to develop 2 No. on-site borrow pits as part of the Proposed Project. It is proposed to obtain a majority of rock and hardcore material that will be required during the construction of the Proposed Project from the on-site borrow pits.

Borrow pit No. 1 located approximately 155 metres to the northeast of Turbine No. 8, measures approximately 12,715m^2 in area and is intended to supply hardcore materials for the construction of the turbines and site roads in the south of the site.

Borrow pit No. 2 located approximately 150 metres to the northwest of Turbine No. 5, measures approximately 11,450m^2 in area and is intended to supply hardcore materials for the construction of turbines in the north of the site and access roads thereto.

(viii) Temporary Construction Compounds

There are 2 no. temporary construction compounds proposed as part of the Proposed Project. Construction compound 1 is the largest compound and measures approximately 73 metres by 45 metres and 3,280 m^2 in area. The second compound measures approximately 73 metres by 35 metres and 2,530 m^2 in area. Both construction compounds 1 and 2 are located approximately 350m and 365m northeast of Turbine 6 respectively.

(ix) Temporary Works – Turbine Component and Abnormal Load Delivery

It is proposed that temporary roads are established through agricultural fields at 3 no. locations for the purposes of turbine components and abnormal load delivery. These field crossings will be excavated and replace type roads, given the ground condition and terrain type at these locations. It should be noted that there is no peat at any of these agricultural fields discussed in locations 2, 5 & 6 below. The methodology used will be broadly similar to that outlined in Section 4.2.2.1.1, without measures directly relating to peat.

(x) Site Drainage

No routes of any natural drainage features will be altered as part of the Proposed Project and turbine locations and associated new roadways were originally selected to avoid natural watercourses, and existing roads are to be used wherever possible.

There will be no direct discharges to any natural watercourses, with all drainage waters being dispersed as overland flows. All discharges from the proposed works areas will be made over vegetation filters at an appropriate distance from natural watercourses. The distance will vary between 5-20m depending on local slope, the nature of local soil deposits and also the type of vegetation present.

(xi) Site Signage

All Site Signage for the construction phase of the Proposed Project will comply with *Safety, Health and Welfare at Work (General Application) Regulations 2007, Chapter 1 of Part 7: Safety Signs at Place of Work*.

Where possible, Site Signage will be securely fastened to gates, fencing and infrastructure within the Proposed Project. Where it is not possible, Site Signage will be secured using 60cm deep concrete foundations and visibly plotted where required throughout the Proposed Project.

(xii) Ancilliary Forest Felling

Tree felling will be required within and around the development footprint to allow the construction of turbine bases, bat buffers, access roads, and the other ancillary infrastructure. Approximately 41.5 hectares of forestry will be replanted in accordance with the Forestry Act 2014, the Forestry Regulations 2017 (SI 191/2017) an as per the Forest Service's policy on granting felling licenses for wind farm developments.

(xiii) Biodiversity Enhancement Measures

Detailed consideration of the approach to afforestation requirements associated with the Proposed Project is attached in Appendix 2-3 of this EIAR. It should be noted that the clearfelling of trees in the State requires a felling licence, as discussed above. The associated afforestation of alternative lands equivalent in area to those lands being permanently clearfelled is also subject to licensing ('afforestation licensing'). The Forest Service of the Department of Agriculture, Food & the Marine is Ireland's national forest authority and is responsible for all forest licensing. In light of the foregoing and for the purposes of this project, the developer commits that the location of any replanting (alternative afforestation) associated with the project will be greater than 10km from the Proposed Wind Farm site and outside any potential hydrological pathways of connectivity i.e., outside the catchment within which the Proposed Project is located. Areas of forestry proposed to be permanently clearfelled for this wind farm are located in upland, marginal land locations.

4. PROPOSED PROJECT DESIGN PROCESS

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

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

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

4.1 Strategic Site Selection

The cost of building each megawatt of electricity-generating capacity in a wind farm is approximately €1.5 million, therefore, it is critical that the most suitable site for a wind farm is selected.

As set out in **Section 3.1** of this Planning Report, the Applicant company is Cahermurphy Renewables Designated Activity Company, which is associated with FuturEnergy Ireland and Mid Clare Renewable Energy (MCRE) Ltd, two companies which have extensive experience in renewable energy and are responsible for several projects across Ireland. FuturEnergy Ireland and MCRE Ltd both invest a significant amount of time and resources identifying and investigating sites for renewable energy proposals throughout the Country.

Site selection for the development of a wind farm must be suitable for consideration under a number of criteria, such as:

- **Environmental Sensitivities**: Located outside of EU Natura 2000 sites; located outside of national designations; located outside of Article 17 Annex I Habitats;
- **Grid Connection**: Access to the national electricity grid possible within a viable distance;
- **Sensitive Receptors**: Capable of complying with required setbacks from sensitive receptors;
- **Site Scale**: Sufficient area of unconstrained land that could potentially accommodate a wind farm development and turbine spacing requirements;
- **Local Policy**: Alignment with the applicable County Development Plan including consideration of any associated Wind Energy Strategy, as applicable.

From the review of the criteria set out above, the Proposed Wind Farm site is considered a suitable location for the provision of a renewable energy development at the scale proposed due to its compliance with the criteria listed above, such as its siting in an area deemed as a 'Strategic Area' and 'Acceptable in Principle' in the Clare Wind Energy Strategy 2023, included within the Clare County Development Plan 2023-2029.

4.2 Detailed Constraints Mapping

The design and layout of the Proposed Wind Farm follows the recommendations and guidelines set out in the *'Wind Energy Development Guidelines'* (Department of the Environment, Heritage and Local Government, 2006) ("the Guidelines (DoEHLG, 2006)") and the *'Best Practice Guidelines for the Irish Wind Energy Industry'* (Irish Wind Energy Association, 2012).

The constraints mapping process involves the placing of buffers around different types of constraints to clearly identify the areas within which no development works will take place. The size of the buffer zone for each constraint has been assigned using guidance presented in the Guidelines (DoEHLG, 2006).

While the *'Draft Revised Wind Energy Guidelines'* (Department of Housing, Planning and Local Government, 2019) ("the Draft Guidelines (DoHPLG, 2019)") have not been adopted, the Proposed Project has been designed to comply with the relevant noise, shadow flicker and separation distances referred therein, including the 4x turbine tip height setback from residential properties.

The Proposed Project is also capable of complying with future guidelines relating to Noise and Shadow Flicker as they are controllable via inbuilt turbine technologies.

The constraints map for the Proposed Wind Farm, as shown in **Figure 4** below was produced following a desk study of all site constraints and encompasses the following constraints and associated buffers (detailed further in **Chapter 3** of the EIAR):

- Sensitive Receptors;
- Hydrology;
- Archaeology; and
- Habitats and Biodiversity.

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

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

The inclusion of the constraints on a map of the study area allows for a viable area to be identified. An initial turbine layout is then developed to take account of all the constraints mentioned above and their associated buffer zones and the separation distance required between the turbines. Following the mapping of all known constraints, detailed site investigations were carried out by the project team.

The ecological assessment of the Proposed Wind Farm site encompassed habitat mapping and extensive surveying of birds and other fauna. This assessment, as described in **Chapters 6 and 7** of the EIAR relating to Biodiversity and Ornithology, optimised the decision on the siting of proposed turbines and the carrying out of any development works, such as the construction of roads.

The hydrological and geotechnical investigations of the Proposed Wind Farm site examined the proposed locations for turbines, roads and other components of the Proposed Project, such as the construction compound. Where specific areas were deemed unsuitable for the siting of turbines or roads, etc., alternative locations were proposed and assessed, taking into account the areas already ruled out by constraints.

The turbine layout for the Proposed Wind Farm has also been informed by the results of noise, landscape and visual considerations and the separation distance to be maintained between turbines. Thus, the baseline environmental assessment of the site and wind farm design was an iterative process, where findings at each stage of the assessment were used to further refine the design, always with the intention of minimising the potential for environmental impacts.

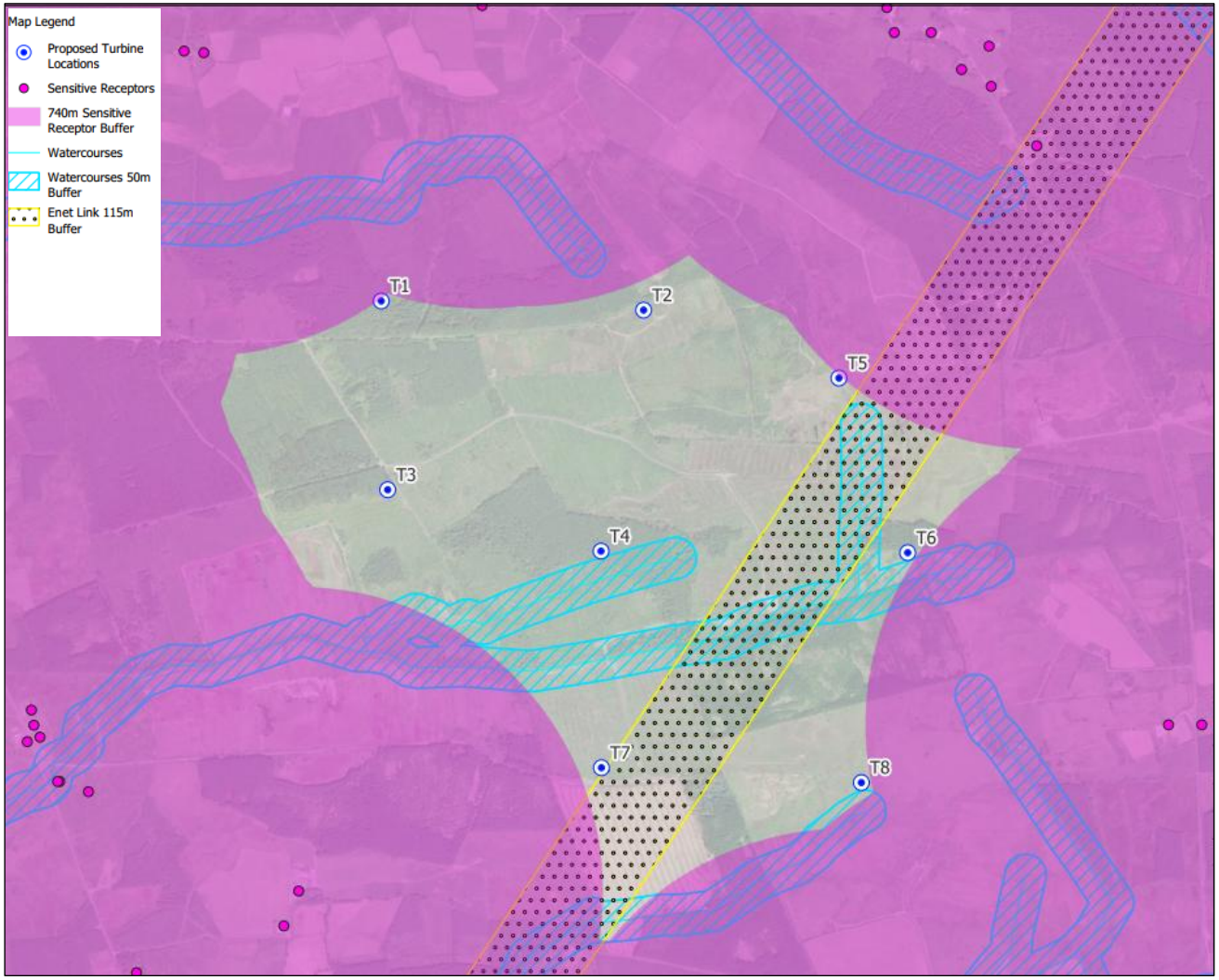


Figure 4 Physical and Environmental Constraints

4.3 Turbine Layout Design Process

The final proposed turbine layout takes account of all site constraints and the distances to be maintained between turbines and from houses, roads, etc. The layout is based on the results of all site investigations that have been carried out during the EIAR process and the EIA scoping process with statutory and non-statutory consultees. As information regarding the Proposed Wind Farm was compiled and assessed, the number of turbines and the proposed layout have been revised and amended to take account of the physical constraints of the Proposed Wind Farm and the requirement for buffer zones and other areas in which no turbines could be located. The EIAR and Proposed Wind Farm design process was an iterative process, where findings at each stage of the assessment were used to further refine the design, always with the intention of minimising the potential for environmental impacts.

The development of the final Proposed Wind Farm layout has resulted following feedback from the various studies, investigations and assessments carried out as well as ongoing negotiations and discussions with landowners and the local community. This final design is regarded as optimal as identified constraints are avoided while also maximising the site's development potential.

Further details of the design process and a selection of design iterations can be found in **Chapter 3, Section 3.2.5**, of the EIAR.

5. PLANNING POLICY APPRAISAL

An extensive and complete planning policy context in respect of Relevant EU, International, National and Regional Planning Policy in respect of the Proposed Project is included in **Appendix 1** of this Report.

For the purposes of this Planning Report, and for conciseness, summary compliance (**Table 3**) below set out an assessment of the Proposed Project in the context of Relevant EU, International, National and Regional Planning Policy

Table 3: EU, National & Regional Policy Objective and Compliance Summary

Policy / Legislative Document	Targets / Objectives	Compliance
REPowerEU	› Accelerate the roll-out of renewables. › Increase the 2030 target for renewables from 40%-45%. › Tackle slow and complex permitting for major renewable projects	Considering the urgency required under the REPowerEU, it is imperative that all suitable sites, such as the site of the Proposed Project, are developed as soon as possible, in accordance with proper planning and sustainable development.
Renewable Energy Directive	42.5% renewable energy by 2030, aiming for 45%.	The Proposed Project will increase Ireland's renewable energy share, contributing towards Ireland's climate and energy obligations under EU law.
European Green Deal	Increases the binding target of renewable sources in the EU's energy mix from 32% to 40% by 2030. Recognises that 75% of the EUs greenhouse gas emissions stems from the production and use of energy, emphasising the need to decarbonise the EU's energy system.	By providing renewable wind energy the Proposed Project supports the European Green Deal's objective of decarbonising the EU's energy system and increasing renewable sources in the EU's energy mix.
Climate Action and Low Carbon Development (Amended) Act 2021	A 51% reduction in emissions by 2030. Net-zero emissions by 2050. Under Section 15, public bodies are required to, in so far as practical, perform their functions in a manner consistent with the Climate Action Plan 2025, the National Energy & Climate Plan 2021 – 2030 and other national climate mitigation and adaptation plans.	The Proposed Project will support the transition to a low-carbon and climate resilient society by reducing greenhouse gas emissions, through the generation of wind energy and displacing electricity that would otherwise be produced from fossil fuel sources. Having regard to the requirements of Section 15 of the Climate Act, the Proposed Wind Farm is fully aligned with CAP 25 the National Energy & Climate Plan 2021 – 2030 and other national climate mitigation and adaptation plans. The development represents critical renewable energy infrastructure that will make a meaningful contribution to achieving the State's reduced emissions targets and the transition towards a climate resilient society.

Policy / Legislative Document	Targets / Objectives	Compliance
Climate Action Plan 2025	9GW of onshore wind by 2030.	The Proposed Project will contribute directly towards the CAP25 goals of 9GW of wind energy by 2030 and renewable electricity share of 80% by 2030. Onshore wind is identified as being critical in the decarbonisation of the electricity and as such the Proposed Wind Farm should be considered in that regard.
Project Ireland 2040: The National Planning Framework	National Strategic Outcome 8: Transition to a low carbon and climate resilient economy.	The Proposed Project is in line with the objectives of the National Planning Framework First Revision (NPF First Revision) which seeks to transition to a low carbon and climate resilient economy. If permitted, the Proposed Project will contribute to the achievement of National Policy Objectives 8, 21, 54, and 55.
National Development Plan 2021 - 2030	National Strategic Outcomes 8: Transition to a Climate-Neutral and Climate Resilient Society	The NDP is clear in its priority to reach a low-carbon, climate resilient society over the lifetime of the plan. The Proposed Project, if permitted, will provide clean, renewable electricity to the national grid, furthering development objectives of the NDP.
National Development Plan Review 2025	Recognises wind energy as a key enabler of the State's legally binding commitment to reduce greenhouse gas emissions by 51% by 2030, including a 75% reduction in emissions from the electricity sector.	The Proposed Project, if permitted, will provide clean, renewable, electricity to the national grid, thus contributing to the decarbonisation of the electricity sector.
National Energy Security Framework	› Ensuring security of energy supply in the near-term. › Reducing our dependency on imported fossil fuels in the context of the phasing out of Russian energy imports across the EU.	The Proposed Project will reduce the need for imported fossil fuels for electricity, improving national energy security.
The National Energy & Climate Plan 2021 – 2030	› Decarbonisation - Renewable energy › Energy security	The Proposed Project will contribute to achieving key decarbonisation and energy security objectives by adding a new renewable electricity generator to the national grid.

Policy / Legislative Document	Targets / Objectives	Compliance
Energy Security in Ireland to 2030 – Energy Security Package	› Reduced and Responsive Demand. › Renewables-Led System. › More Resilient Systems. › Robust Risk Governance.	The Proposed Project supports the objectives to ensure the State's energy security. This Proposed Project serves as a domestic renewable energy generator capable of providing clean electricity to the national electricity grid.
Wind Energy Guidelines	› Acceptable noise thresholds and monitoring frameworks › Visual amenity setback and spacing › Control of shadow flicker › Compliance with Community consultation and dividends requirements › Consideration of the siting, route and design of the proposed grid connection as part of the whole project.	The Proposed Project complies with the requirements set out by the Guidelines (DoEHLG, 2006), including noise, set back, shadow flicker, and community consultation guidelines. It is anticipated that the Proposed Project will be able to comply with future wind energy guidelines.
Southern Regional Assembly Regional Economic and Spatial Strategy	**RPO 95: Sustainable Renewable Energy Generation –** It is an objective to support implementation of the National Renewable Energy Action Plan (NREAP) and the Offshore Renewable Energy Plan and the implementation of mitigation measures outlined in their respective SEA and AA and leverage the Region as a leader and innovator in sustainable renewable energy generation **RPO 99: Renewable Wind Energy –** It is an objective to support the sustainable development of renewable wind energy (onshore and off-shore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines **RPO 221: Renewable Energy Generation and Transmission Network**	The Proposed Project complies with the Southern Regional Assembly Regional Economic and Spatial Strategy (RSES) including RPO 95, RPO 99 and RPO221, which supports the development of renewable energy in and associated grid infrastructure within the Southern Region. The Proposed Project will strengthen the role of the Southern Region a leader in the renewable energy generation and in doing so, will support the transition to a climate resilient society. The site has been carefully selected with regard to environmental and ecological sensitivities, the Wind Energy Guidelines, access to grid and local development policy, which will ensure the delivery of onshore wind at an appropriate location. The Proposed Project will increase the supply of renewable electricity and contribute to National and Regional climate objectives.

Policy / Legislative Document	Targets / Objectives	Compliance
	› Local Authority City and County Development Plans shall support the sustainable development of renewable energy generation and demand centres such as data centres which can be serviced with a renewable energy source (subject to appropriate environmental assessment and the planning process) to spatially suitable locations to ensure efficient use of the existing transmission network; › The RSES supports strengthened and sustainable local/community renewable energy networks, micro renewable generation, climate smart countryside projects and connections from such initiatives to the grid. The potential for sustainable local/community energy projects and micro generation to both mitigate climate change and to reduce fuel poverty is also supported; › The RSES supports the Southern Region as a Carbon Neutral Energy Region.	
European Union (Planning and Development) (Renewable Energy) Regulations 2025	Transposes the provisions of the Renewable Energy Directive into planning legislation. Introduces new streamlined decision timelines for new wind farms and repowering projects and IROPI projects. Importantly, renewable energy developments, including related grid and storage infrastructure, are now presumed to be in the overriding public interest.	The Proposed Project is subject to the provisions of the Renewable Energy Directive III (Directive 2023/2413) and is therefore subject to the European Union (Planning and Development) (Renewable Energy) Regulations 2025. By delivering additional renewable generation capacity, the Proposed Project will enhance Ireland's renewable energy share and directly support the State in meeting its binding climate and energy obligations under EU law.

5.1 Local Policy Context

5.1.1 Clare County Development Plan 2023 – 2029

The Clare County Development Plan 2023 – 2029 (CCDP) was adopted by the Elected Members of Clare County Council on March 9th 2023. The CCDP officially came into effect on April 20th 2023, 6 weeks later. The CCDP provides overall guidance for the proper planning and development of County Clare through the use of supporting policies and objectives.

The policies and objectives set out within the CCDP are supportive of the development of renewable energy within the country. Climate action is an important strategic objective of the CCDP, with aims to achieve decarbonisation and climate resilience as a county. This has been reflected in Chapter 2 – Climate Action, in addition to other climate action and renewable energy related objectives introduced throughout the Plan.

The significance of climate change and the need for continued support / investment within renewable energy generation as part of the county's adaption strategy is captured within the objectives of the CCDP's Climate Action Chapter:

- **Goal II:** A county that is resilient to climate change, plans for and adapts to climate change and flood risk, is the national leader in renewable energy generation, facilitates a low carbon future, supports energy efficiency and conservation and enables the decarbonisation of our lifestyles and economy.

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

Table 4: Compliance with CCDP Policy & Objectives

Topic	Policy / Objectives	Compliance
Climate Action	**CDP 2.1: Climate Action** It is an objective of Clare County Council: a) To support the implementation of the National Climate Action Plan 2023 and the National Climate Change Adaptation Framework (and any subsequent versions thereof), and to work with the Regional Climate Action Offices to enable County Clare to transition to a low carbon and climate resilient county; b) To adopt sustainable planning strategies through integrating land use and transportation and by facilitating mixed use developments as a means of supporting national targets of climate policy mitigation and adaptation objectives, and reducing our carbon footprint and greenhouse gas emissions; and c) To raise awareness and understanding of the impacts of climate change on both the local economy and communities in the county, and the ways communities can increase their response and grow their resilience to these impacts.	The Proposed Wind Farm is in compliance with CCDP 2.1 as it will deliver up to 57.6MW of onshore renewable energy, directly contributes to the wind energy target of 9GW of onshore wind introduced by CAP 23. The Proposed Project will generate clean, renewable electricity, which will be integrated into the grid, helping to electrify and decarbonise other sectors. This will also aid in achieving the climate change and renewable energy objectives to reach national targets and transition to a low carbon economy.
	CDP 2.2: Climate Change Mitigation, Adaption and Resilience It is an objective of the Clare County Council: a) To support the implementation of the Clare Climate Change Adaptation Strategy 2019-2024 (and any subsequent versions); b) To promote measures that build resilience to climate change to address impact reduction, adaptive capacity, awareness raising, providing for nature-based solutions and emergency planning; c) To raise awareness of issues relating to climate change and climate change adaptation during the lifetime of this plan; d) To liaise, collaborate and work in partnership with the relevant government approved sectors in relation to initiatives and activities across the county;	The Proposed Wind Farm supports the implementation of the updated Clare Climate Action Plan 2024 – 2029. The proposed Wind Farm will aid decarbonisation measures in the County and is therefore in line with the aims of the Climate Action Plan. The Proposed Wind Farm will contribute to the progression of renewable energy generation and technologies in Co. Clare.

Topic	Policy / Objectives	Compliance
	e) To support the Ennis 2040 Spatial and Economic Strategy and its aspiration for Ennis to become Ireland's first climate adaptive town; and f) To facilitate and support the relevant stakeholders and enterprises in the progression of advancements in climate adaptation solutions and renewable energy generation and technologies	
	CDP2.14 Transition to a Low Carbon Economy and Society It is an objective of Clare County Council: a) To facilitate measures which will accelerate the transition to a low carbon economy and a circular economy through mechanisms such as the Climate Action Competitive Fund; b) To support the development of enterprises that create and employ green technologies and to promote County Clare as a low carbon county as a means of attracting inward investment to the county and to the wider Southern Region; c) To support the Ennis 2040 Strategic Objective to establish Ennis as Ireland's first climate adaptive town; d) To support and facilitate the implementation of the Clare Climate Change Adaptation Strategy 2019-2024; e) To ensure that the development of green industry and technologies incorporates careful consideration of potential environmental impacts at project level including the capacity of the receiving environment and existing infrastructure to serve these new industries. f) To facilitate the development of energy sources which will achieve low carbon output. g) To support sustainable modes of transport such as walking and cycling through promotional strategies and the provision of active travel infrastructure where required; h) To work to implement the provisions of Ireland's Transition to a Low Carbon Energy Future 2015-2030 as they relate to County Clare; i) To require the submission of an Energy Efficiency and Climate Change Adaptation Design Statements for large scale commercial and residential applications; j) To promote climate change issues across business, public and residential sectors and to target measures and support initiatives to achieve reduced greenhouse gas emissions	By supplying sustainable renewable energy, the Proposed Wind Farm will reduce the need for non-renewable sources like coal and oil, helping to transition toward a low carbon economy and cleaner energy usage in the county. By providing between up to 57.6MW of energy, the Proposed Wind Farm of 8 no. wind turbines at Cahermurphy, Co. Clare will contribute to enhancing energy security by decreasing the dependency on fossil fuel electricity generation. Furthermore, the generation of renewable energy through resources like the Proposed Project will help to moderate energy costs for consumers over time, both locally and nationally. This aligns with the objectives of Ireland's Transition of a Low Carbon Energy Future 2015-2030 through renewable energy generation in the County and supports the implementation of the CCDP's objectives of promoting sustainable and secure energy in Co. Clare.

Topic	Policy / Objectives	Compliance
	in accordance with current and future national targets, improve energy efficiency and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture; k) To support investments in the energy efficiency of existing commercial and public building stock with a target of all public buildings and at least one-third of total commercial premises upgraded to BER Rating 'B'; and l) To report annually on energy usage in all public buildings and to achieve a target of 33% improvement in energy efficiency in all buildings in accordance with the National Energy Efficiency Action Plan (NEEAP).	
Renewable Energy	**CDP 11.47: Renewable Energy** It is an objective of Clare County Council the Development Plan: a) To encourage and to favourably consider proposals for renewable energy developments, including community owned developments, and ancillary facilities in order to meet National, Regional and County renewable energy targets, and to facilitate a reduction in CO2 emissions and the promotion of a low carbon economy; b) To assess future renewable energy-related development proposals having regard to the Clare Renewable Energy Strategy 2023-2030 in Volume 5 of this plan and associated SEA and AA; c) To support the sustainable development of renewable wind energy (onshore and offshore) at appropriate locations and of its related grid infrastructure in County Clare, in accordance with all relevant policies, guidance and guidelines pertaining to the protection of the environment and protected habitats and species, and to assess proposals having regard to the Clare Wind Energy Strategy in Volume 6 of this plan and the associated SEA and AA, or any subsequent updated adopted Strategy and to national Wind Energy Guidelines; d) To prepare a new and updated Wind Energy Strategy for County Clare during the lifetime of this plan, subject to the publication of the update to the Wind Energy Development Guidelines for Planning Authorities 2006;	As a renewable energy project that directly contributes to the achievement of a crucial national climate target, the Proposed Wind Farm contributes directly to this objective and therefore should be favourably considered by CCC. The Proposed Wind Farm is suitably sited in an area classified as a 'Strategic Area' and 'Acceptable in Principle' area in the Clare Wind Energy Strategy. The Proposed Wind Farm has been designed in compliance with the Wind Energy Guidelines (2006). The wind farm design has also had regard to the Draft Wind Energy Guidelines (2019). The Proposed Wind Farm, through strategic site selection exercise, including a detailed constraints analysis has been designed to limit the impact on the residential properties in the vicinity of the proposed turbines. This will ensure that an appropriate balance is met between facilitating renewable energy development and protecting residential amenity. The

Topic	Policy / Objectives	Compliance
	e) To strike an appropriate balance between facilitating renewable and wind energy-related development and protecting the residential amenities of neighbouring properties; f) To support and facilitate the development of new options and technological advances in relation to renewable energy production and storage, that may emerge over the lifetime of this Plan; g) To support the integration of indigenous renewable energy production and grid injection; h) To ensure that all proposals for renewable energy developments and ancillary facilities in the County are in full compliance with the requirements of the SEA and Habitats Directive and Objective CDP 3.3 of this plan; and To promote and market the County as a leader of renewable energy provision.	Proposed Wind Farm complies with the requirements set out by the 2006 Guidelines, including noise, set back, shadow flicker. The Proposed Wind Farm also adheres to the 2019 guidelines in relation to shadow flicker (zero). The layout of the proposed wind turbines achieves a 4 times tip height set back distance from all dwellings.
	CDP 6.17: Energy Supply It is an objective of Clare County Council to contribute to the economic development and enhanced employment opportunities in the county by: a) Enabling the development of a self-sustaining, secure, reliable and efficient renewable energy supply and storage for the County in line with CDP Objective 3.3; b) Facilitating the county to become a leader in the production of sustainable and renewable energy for national and international consumption through research, technology development and innovation; and c) Supporting on-land and off-shore renewable energy production by a range of appropriate technologies in line with CDP Objective 3.3.	The Proposed Wind Farm directly supports the objectives of CDP6.17 through the generation of renewable energy and reducing the County's reliance on fossil fuel electricity generation. In doing so, it will enable the development of a self-sustaining, secure, reliable and efficient renewable energy supply and storage for the County, further advancing the Council's goal of contributing to economic development and enhanced employment opportunities in the county.
	CDP 8.12: Renewable Energy Development It is an objective of Clare County Council the Development Plan: To support the implementation of the National Renewable Energy Action Plan	Through the provision of up to 57.6MW of renewable electricity, the Proposed Wind Farm contributes to the achievement of the policies and objectives of the NREAP, the Clare Wind Energy Strategy and the Clare Renewable Energy Strategy.

Topic	Policy / Objectives	Compliance
	(NREAP), the Clare Wind Energy Strategy and the Clare Renewable Energy Strategy to facilitate the development of renewable energy developments in rural areas to meet national objectives towards achieving a low carbon economy by 2050 subject to the requirement of the RES SEA Environmental Report and the mitigation measures arising from the CDP Appropriate Assessment as contained in Volume 10(a).	
	CDP 11.44: Energy Security It is an objective of Clare County Council the Development Plan: To promote and facilitate the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure, to integrate renewable energy sources, thereby creating a secure and efficient energy supply and storage system for County Clare which is ready to meet increased demand as the regional economy grows.	Projects such as the Proposed Project are a critical component in decoupling the county from reliance on fossil fuels. By generating renewable energy, wind farms contribute to achieving the long-term goal of replacing fossil fuels with sustainable energy sources. The Proposed Project therefore aligns with the CCDP 11.44 'Energy Security,' emphasising a transition away from traditional non-renewable fuels to a renewables led electricity system.
	CDP 11.45: Electricity Networks It is an objective of Clare County Council: **a)** To facilitate improvements in energy infrastructure and encourage the expansion of the infrastructure within the county; **b)** To facilitate future alternative renewable energy developments and associated utility infrastructure throughout the county; **c)** To support the Integrated Single Electricity Market (ISEM) as a key priority for the Southern Region and the sustainable development and reinforcement of the energy	The Proposed Project includes the provision of 110kVunderground electrical cabling to facilitate the connection and distribution of the renewable energy generated by the Proposed Wind Farm thereby supporting improvements in energy infrastructure and encouraging the expansion of the infrastructure within the County.

Topic	Policy / Objectives	Compliance
	grid including grid connections, transboundary networks to and through County Clare subject to appropriate environmental assessment and planning processes; **d)** To collaborate with EirGrid to facilitate the development of a safe, secure and reliable supply of electricity, enhanced electricity networks and new transmission infrastructure projects that might be brought forward in the lifetime of this Plan under EirGrid's (2017) Grid Development Strategy (subject to appropriate environmental assessment and the planning process); **e)** To collaborate with EirGrid over the lifetime of the plan to ensure that the county's minimum target of 1,167MW of renewable energy generation is achieved and can be accommodated on the electricity network in County Clare; and **f)** To have regard to environmental and visual considerations in the assessment of developments of this nature and ensure compliance with the environmental requirements of objective CDP 3.3 of this plan.	The Grid Connection, through facilitation of the Wind Farm Site, will contribute towards the national wind energy target of 9GW by 2030. The importance of this application with regards to the climate goals cannot be overlooked.
	CDP 11.48: Renewable Energy Strategy It is an objective of Clare County Council: a) To support implementation of the National Renewable Energy Action Plan (NREAP), and the Offshore Renewable Energy Plan including mitigation measures outlined in their respective SEA and AA and promote County Clare and the Southern Region as a leader and innovator in sustainable renewable energy generation; b) To support the implementation of the Clare Renewable Energy Strategy 2023-2029 in Volume 5 of this plan; and c) To support the development of a Regional Renewable Energy Strategy with relevant stakeholder	The Proposed Project is supported by the policies and objectives of the NREAP. The Proposed Wind Farm is compliant with the policies and objectives of the Renewable Energy Strategy (RES).
	CDP15.1 Biodiversity It is an objective of Clare County Council:	The Proposed Project takes into consideration the importance of the local biodiversity to make sure it is

Topic	Policy / Objectives	Compliance
Biodiversity, Natural Heritage and Green Infrastructure	a) To implement the National Biodiversity Action Plan 2017- 2021, the All Ireland Pollinator Plan 2021-2025, the EU A Farm to Fork Strategy 2020, the County Clare Heritage Plan 2017-2023 and the County Clare Biodiversity Plan 2017- 2023, or any subsequent plans, in partnership with all relevant stakeholders; b) To review the Clare County Heritage Plan 2017-2023 and to prepare a new plan, which will be set within the context of the National Heritage Plan "Heritage Ireland 2030", upon the expiry of the existing adopted Plan; c) To support National Biodiversity Week and events such as Bioblitz in order to increase awareness of biodiversity and its benefits to the community;	retained during the construction, operation and decommissioning phases of the Proposed Project.
	CDP 15.3: European Sites It is an objective of Clare County Council: a) To afford the highest level of protection to all designated European sites in accordance with the relevant Directives and legislation on such matters; b) To require all planning applications for development that may have (or cannot rule out) likely significant effects on European Sites in view of the site's Conservation Objectives, either in isolation or in combination with other plans or projects, to submit a Natura Impact Statement in accordance with the requirements of the EU Habitats Directive and the Planning and Development Act, 2000 (as amended); and c) To recognise and afford appropriate protection to any new/modified SPAs or SACs that are identified during the lifetime of this Development Plan through the planning application process bearing in mind proposals for development outside of a European site may also have an indirect effect	The Proposed Project application considers the impact on protected sites, habitats and species. The EIAR concludes that there will be no significant negative impacts on the protected species and habitats of designated sites. The NIS concludes that the Proposed Project, individually or in-combination with other plans or projects, will not adversely affect the integrity of any European Site.
	CDP 15.4: Requirement for Appropriate Assessment It is an objective of Clare County Council: a) To implement Article 6(3) and where necessary 6(4) of the Habitats Directive and to ensure that Appropriate Assessment is carried out in relation to works, plans and	To support ACP in carrying out their Appropriate Assessment, an Appropriate Assessment Screening Report and Natura Impact Statement (NIS) have been prepared for the Proposed Project. This report has been prepared to provide the competent

Topic	Policy / Objectives	Compliance
	projects likely to impact on European Sites (SACs and SPAs), whether directly or indirectly or in combination with any other plan(s) or project(s); and b) To have regard to Appropriate Assessment of Plans and Projects in Ireland – Guidelines for Planning Authorities 2009 or any updated version.	authorities with the information necessary to complete an Appropriate Assessment screening and an Appropriate Assessment for the Proposed Project in compliance with Article 6(3) of the Habitats Directive. The NIS concludes that the Proposed Project, individually or in-combination with other plans or projects, will not adversely affect the integrity of any European Site. It is therefore judged that, provided the Proposed Project is constructed and operated in accordance with the design, best practice and mitigation that is described within this application, significant residual impacts on biodiversity, flora and fauna will not occur. The biodiversity enhancement measures outlined for the Proposed Project will result in an improvement of the existing ecological conditions of the Site.
	CDP15.5: Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs) It is an objective of Clare County Council: a) To actively promote the conservation and protection of areas designated as NHA's (including proposed sites) and to only consider proposals for development within or affecting an NHA where it can be clearly demonstrated that the proposed development will not have a significant adverse effect on the NHA or pNHA; and b) To identify and afford appropriate protection to any new, proposed or modified NHA's identified during the lifetime of the Development Plan;	Chapter 6 of the EIAR provides a full assessment of any potential impacts from the construction operational and decommissioning phases on all NHAs and pNHAs within 20km of the proposed turbine locations. No negative effects have been identified, thus the Proposed Project is in full compliance with CDP 15.5.

Topic	Policy / Objectives	Compliance
	CDP 15.8: Non-Designated Sites and Biodiversity It is an objective of Clare County Council: a) To ensure the protection and conservation of areas, sites, species and ecological networks/corridors of biodiversity value outside of designated sites throughout the County and to require an ecological assessment to accompany development proposals likely to impact on such areas or species; b) To ensure that available habitat mapping is taken into consideration in any ecological assessment undertaken; c) To complete the Habitat Mapping of the County (in accordance with A Guide to Habitats in Ireland – The Heritage Council 2000) in order to identify and record the natural habitats of the County at a detailed level and afford appropriate protection to areas of importance as required; and d) To implement and monitor the actions as set out in the Clare Biodiversity Action Plan and the National Biodiversity Action Plan	As detailed in Chapter 6 of the EIAR, the Proposed Project has been specifically designed to avoid or mitigate impacts on biodiversity. As detailed in the Bat Report in Appendix 6-2 of the EIAR, there is unlikely to be any significant effect in relation to collision risk to bats from the Proposed Wind Farm. As detailed in Chapter 7 of the EIAR, the Collision Risk Assessment (CRA) indicates that the impact of the Proposed Wind Farm on birds corresponds to a Low-Very Low effect significance.
	CDP15.12: Biodiversity and Habitat Protection It is an objective of Clare County Council: a) To protect and promote the sustainable management of the natural heritage, flora and fauna of the County both within protected areas and in the general landscape through the promotion of biodiversity, the conservation of natural habitats, the enhancement of new and existing habitats, and through the integration of Green Infrastructure (GI), Blue Infrastructure and ecosystem services including landscape, heritage, biodiversity and management of invasive and alien species into the Development Plan; b) To promote the conservation of biodiversity through the protection of sites of biodiversity importance and wildlife corridors, both within and between the designated sites and the wider Plan area; c) To support the implementation of the All Ireland Pollinator Plan, National Biodiversity Action Plan and National Raised Bog SAC Management Plan;	Chapter 6: Biodiversity (Flora and Fauna) of the EIAR presents an assessment of all habitats present within the Proposed Wind Farm site boundary, and those of EU importance located within the Zone of Influence (i.e. the within the EIAR Site Boundary, those in proximity to the EIAR Site Boundary, and those with hydrological connectivity), and also demonstrates the avoidance of the Proposed Wind Farm relating to these sensitive habitats.

Topic	Policy / Objectives	Compliance
	d) To ensure there is no net loss of potential Lesser Horseshoe Bat feeding habitats, treelines and hedgerows within 2.5km of known roosts; e) To implement and monitor the actions as set out in the Clare County Biodiversity Plan; and To promote biodiversity net gain in any new plans/projects/policies to promote development that leaves biodiversity in a better state than before	
	CDP15.19 Woodlands, Trees and Hedgerows It is an objective of Clare County Council: a) To preserve and conserve individual or groups of trees identified in Volume 2 of this Plan as 'Trees for Preservation' which will enhance the character and appearance of an area; b) To carry out tree survey work during the lifetime of this Plan to identify future trees of importance in the County and facilitate their future protection; c) To protect individual or groups of trees within the Plan area which are important for environmental, recreational, historical, biodiversity and/or aesthetic reasons or by reason of contribution to sense of place, including groups of trees which correspond with protected habitats, or which support protected species, under the Habitats Directive; d) To work with landowners, local communities and other relevant groups to promote the retention and conservation of existing trees and hedgerows and encourage development proposals that enhance the landscape through positive management and additional planting/sensitive replanting of native tree species; e) To protect woodlands and hedgerows from damage and/or degradation and to prevent disruption of the connectivity of woodlands and hedgerows of the County; f) To ensure, where required, applications for development include proposals for planting / leave a suitable ecological buffer zone, between the development works and areas/features of ecological importance; g) Where hedgerows are required to be removed in the interests of traffic safety or where breaches to hedgerows occur due to river drainage/maintenance works and flood repair, to require the applicant/developer to reinstate the hedgerows with a suitable replacement of native species to the satisfaction of the Council;	As detailed in Chapter 3: Consideration of Alternatives of the EIAR, the Proposed Project layout was designed on a constraints-led basis Chapter 6 and its appendices of the EIAR also details the surveys carried out on the Proposed Project site. There will be no net loss of habitats as a result of the Proposed Project. Trees that have been felled will be replanted.

Topic	Policy / Objectives	Compliance
	h) To require each green space in new residential developments to have at least one native oak tree, or other naturalised tree species of similar stature and lifespan, integrated into the agreed planting/landscaping scheme; and To require, where possible, that all trees felled as a result of development proposals be replaced at a minimum ratio of 10 new native species per 1 tree felled.	
Landscape	**CDP 14.2 Settled Landscape** It is an objective of the Development Plan: To permit development in areas designated as 'settled landscapes' that sustain and enhance quality of life and residential amenity and promote economic activity subject to: I. Conformity with all other relevant provisions of the Plan and the availability and protection of resources; II. Selection of appropriate sites in the first instance within this landscape, together with consideration of the details of siting and design which are directed towards minimising visual impacts; III. Regard being given to avoiding intrusions on scenic routes and on ridges or shorelines. Developments in these areas will be required to demonstrate: a) That the site has been selected to avoid visually prominent locations; b) That the site layouts avail of existing topography and vegetation to reduce visibility from scenic routes, walking trails, water bodies, public amenities and roads; c) That design for buildings and structures reduce visual impact through careful choice of forms, finishes and colours, and that any site works seek to reduce visual impact.	The Proposed Wind Farm is located in a Settled Landscape. This landscape is described as areas where people live and work comprise the network of farmland, villages and towns that make up the majority of the County. They provide opportunities for enterprise, leisure and personal fulfilment. The Proposed Project has been designed in accordance with the objectives of CDP 14.2. The siting and layout of the Proposed Wind Farm has followed a constraints-led approach as detailed in Section 3.6.1 of Chapter 3 of the EIAR. Furthermore, the Proposed Project has been designed to minimise visual intrusion on the surrounding area which has been fully assessed in Chapter 13 - Landscape and Visual of the EIAR and supported by the comprehensive suite of photomontages included in the Photowire Visualisation Booklet provided at Appendix 14-5 of the EIAR. In summary, the Proposed Wind Farm supports this policy objective by balancing sustainable development with the protection of residential amenity and visual integrity of this landscape.

Topic	Policy / Objectives	Compliance
Architectural Archaeological and Cultural Heritage	**CDP16.1: Archaeology Heritage** It is an objective of Clare County Council: a) To ensure the protection of the architectural heritage of County Clare through the identification of Protected Structures, the designation of Architectural Conservation Areas, the safeguarding of historic gardens, and the recognition of structures and elements that contribute positively to the vernacular and industrial heritage of the county; and b) To ensure that the archaeological and architectural heritage of the county is not damaged either through direct destruction or by unsympathetic developments. c) To support and promote architectural vernacular skills training and facilities in the county	A robust archaeological assessment is provided in Chapter 13 of the EIAR. The Proposed Wind Farm has also been designed with consideration for the recorded monuments of the area. There are no recorded monuments located within the Proposed Wind Farm site. Chapter 13 of the EIAR provides a full assessment of the direct and indirect effects of the Proposed Project on the archaeological and architectural heritage within the study area (i.e. 25km from the proposed turbine locations). This assessment includes a visual assessment of the Proposed Project in relation to monuments/areas of archaeological and architectural heritage. There are no protected structures or Architectural Conservation Areas or historic gardens located within the site of the Proposed Wind Farm. Similarly, no structures listed in the NIAH are located within the Proposed Wind Farm. There are a total of four structures recorded within the 5km study area of the Proposed Wind Farm. All four are also listed in the NIAH building survey. There is also one recorded architectural site situated within the 100m corridor study area for the Proposed Grid Connection Route. It is both a protected structure and a NIAH structure.

Topic	Policy / Objectives	Compliance
		As detailed in Chapter 13 of the EIAR, following the completion of all construction mitigation measures, there will be no significant residual effects on the archaeological, architectural and cultural heritage resource. This is due to the fact that any archaeological remains located within the proposed development area will be identified during archaeological monitoring. This will lead to either their preservation in-situ or by record. As all archaeological remains will be identified and preserved, there will be no significant residual effects. In conclusion, no significant adverse effects are anticipated in relation to any Protected Structures, ACA's or Historic Gardens.

5.1.2 Development Management Standards

Appendix 1 of the CCDP sets out the development management standards that apply to a wide range of developments and which are required to be considered as part of the planning application process. Section A1.2.3 relates to renewable energy, which is directly applicable to the Proposed Wind Farm, and which states:

> *"The Planning Authority will assess such development proposals on a case by case basis, having regard to current Government policy and Ministerial guidelines, the Clare Renewable Energy Strategy, the Clare Wind Energy Strategy, the relevant objectives contained in this plan,"*

In addition to this, within Appendix 7 of the CCDP, Clare County Council links section of the CCDP to the relevant Section 28 Ministerial guidelines, which require local and regional policy to align with broader national policy. In the case of the Proposed Project, the national 'Wind Energy Development Guidelines (2006 and draft 2019), directly correlates to sections of the CCDP with Chapter 2 Climate Action, Chapter 11 Transport, Service Infrastructure and Energy and Volume 6 Clare Renewable Energy Strategy have been formulated having regard to the Wind Energy Guidelines.

5.2 Clare Wind Energy Strategy 2023 – 2029

County Clare's Wind Energy Strategy 2023-2029 is included in Volume 6 of the Clare County Development Plan. The Strategy helps to facilitate the development of wind farms by maximising the wind resource of the County having regard to recent technological advances in turbine design, updated information on wind speeds, proximity and availability to grid connections and to changing energy and grid connection regulations, while minimising any environmental and visual impacts. This Wind Energy Strategy allows for the designations of areas as being:

A) 'Strategic,'
B) 'Acceptable in Principle,'
C) 'Open to Consideration,' and
D) 'Not Normally Permissible.

In regard to the Proposed Project, the Proposed Turbine Locations are situated within a 'Strategic' Area and 'Acceptable in Principle' area which are favourable areas for the development of wind energy infrastructure. In addition to these area designations, the Strategy provides general objectives for Wind Energy Developments within the County, which have been listed in **Table 5** below.

Table 5: Objectives of Clare Wind Energy Strategy 2023-2029

Policy Objective	Description	Proposed Project Compliance
WES One: Development of Renewable Energy Generation	It is the objective of the Council to support, in principle and in appropriate scales and locations, the development of wind energy resources in County Clare. It is an objective of the Council to ensure the security of energy supply by accommodating the development of wind energy resources in appropriate areas and at appropriate scales within the County	The Proposed Wind Farm turbines are located within an area designated as a *'Strategic Area' and 'Acceptable in Principle'* which are considered suitable for wind energy development as outlined in the WES. The Proposed Project will support the Council in achieving its objective to ensure the security of energy supply by accommodating the development of wind energy resources.
WES Two: Development of Low Carbon Economy	County Clare will seek to promote itself as moving towards becoming a low carbon County by 2017 as a means of attracting inward investment to the County and the wider MidWest region.	The Proposed Project will support County Clare towards becoming a low carbon County as it will contribute over 50MW of renewable wind energy generation to County Clare's Wind Energy targets.
WES Three: County Partnership Approach	Clare County Council will seek to promote wind energy in appropriate sites in the County and will work with agencies such as the Clare County Development Board, Clare Enterprise Board, Limerick Clare Energy Agency, Shannon Development, I.D.A and Enterprise Ireland to encourage investment in research and technology associated with wind farms and other renewable energy technology.	Projects such as the Proposed Project support Co. Clare in encouraging investment in research and technology associated with wind farms and other renewable energy technology. By generating renewable energy, wind farms such as the Proposed Project contribute to achieving the long-term goal of replacing fossil fuels with sustainable energy sources. The Proposed Project will contribute over 50MW of renewable wind energy generation to Clare's County Clare's Wind Energy targets.

WES Four: Response to National Policy	The White Paper on Energy has set a target of 40% of electricity to be generated from renewable sources by 2020. In the Mid-West Regional Climate Change Strategy, County Clare is identified as having a potential 600MW energy produced from renewables by 2020. Clare County Council will aim to achieve a minimum target of 550MW from wind energy by the conclusion of this Strategy.	The Proposed Development will contribute up to 57.6MW of renewable wind energy generation to Clare's County Clare's Wind Energy targets.
WES Five: Promotion of Community Involvement	Clare County Council will seek to promote community involvement and require community benefit where possible in wind farm developments.	A Community Liaison Officers (CLO) was appointed as the points of contact for the Proposed Project and has been engaging with the local community. The purpose of the CLO was to introduce the Proposed Project to the local community, engage and establish a line of dialogue with the local community and facilitate one-to-one consultation meetings, or group meetings where requested. Please see Section 2.5.5 of this Planning Report for further detail on the Community Consultation process.
WES Six: Infrastructure Development Proposals	Proposals for the development of infrastructure for the production, storage and distribution of electricity through the harnessing of wind energy will be considered in appropriate sites and locations, subject to relevant policy, legislation and environmental considerations	The design and layout of the Proposed Project follows the recommendations and guidelines set out in the '*Wind Energy Development Guidelines'* (Department of the Environment, Heritage, and Local Government, 2006), the '*Draft Wind Energy Guidelines* ', ('WEGs') (Department of the Environment, Heritage and Local Government, 2019), and the '*Best Practice Guidelines for the Irish Wind Energy Industry*' (Irish Wind Energy Association, 2008). The Site has been subject to a comprehensive environmental and ecological appraisal to ensure that the Proposed Project does not result in any significant adverse environmental or ecological impacts. A detailed analysis of

		site-specific constraints was carried out in order to inform the placement of the proposed infrastructure. These assessments are mainly included within Chapter 6 of this EIAR however ecological and environmental considerations are included throughout each chapter of the EIAR
WES Seven: Natura 2000 Sites	Having regard to the provisions of the Habitats Directive 92/43/EEC, where a proposed development will give rise to significant adverse direct, indirect or secondary impacts on Natura 2000 sites, (either individually or in combination with other plans or projects), permission will only be granted where there is no alternative solution and where there are imperative reasons of overriding public interest in favour of granting permission, including those of a social or economic nature.	The impact of the Proposed Project on designated sites is considered in full in the EIAR and the NIS. Chapter 6 of the EIAR and NIS conclude that the Proposed Project will not give rise to any significant negative impacts on designated sites.

5.3 Clare Renewable Energy Strategy

As reflected within the key goals of the CCDP, Clare County Council wants to ensure that Co. Clare has the necessary land use and strategy framework in place to maximise the harnessing and use of its renewable energy resources and inform and guide the planning process for future renewable energy development. The Clare Renewable Energy Strategy 2023-2029 (RES) was adopted as part of the CCDP 2023 – 2029 and includes the following vision:

> *"A County Clare that is the national leader in renewable energy generation which supports energy efficiency and conservation, and which achieves balanced social and economic development throughout the County and assists in achieving national climate change mitigation targets."*

This Vision is underpinned by several strategic aims of which the following are considered to be of particular relevance to the Proposed Project:

a) *To support the attainment of and to exceed in County Clare, where possible, the National targets and commitments to renewable energy;*

b) *To identify/highlight the opportunities for various renewable energy technologies and resources and identify broad areas suitable for their development in full compliance with the requirements of all environmental legislation including the requirements of the Strategic Environmental Assessment Directive, Habitats Directive and Water Framework Directive;*

c) *To maximise the opportunities for renewable energy development whilst safeguarding the environment and existing residential amenities; and*

d) *To safeguard, where appropriate, areas with potential for renewable energy projects and to guide renewable energy development to preferred locations.*

The RES acknowledges that Co. Clare has the natural resources needed to maximise energy generation by renewable means: geographical location on the Shannon Estuary and its Atlantic coastline, strong wind resource, undulating topography and a significant grid network. These attributes present opportunities for both on-shore and off-shore wind, wave and tidal energy, and pumped freshwater hydro energy storage. The RES notes that "*energy needs in County Clare are expected to rise by 2020...*" which is balanced against a recognition that "*the County has considerable capacity to produce energy from renewable and indigenous resources*". In this regard, **Policy RES 2.1** states that "*it is an objective of Clare County Council to meet the County's energy needs from 100% indigenous renewable energy sources.*"

The RES sets out a sustainable balance of renewable energy resources up to 2023 which ensures that there is no over reliance or over concentration on any single technology. With regard to wind energy, a target of ***550MW*** has been identified. It should be noted, however, that this target is not a 'cap' and will not limit the potential for greater generation of renewable energy if exceeded.

- ***Objective RES 3.1*** *(Renewable Energy Targets): To facilitate the achievement of (or to exceed where possible) the renewable energy targets set out in Table 3.2 by 2030, ensuring that County Clare is the national leader in sustainable renewable energy generation, supporting energy efficiency, security and conservation, achieving balanced social, environmental and economic development throughout the County and assisting in the achievement of Ireland's Green Energy target.*

The Proposed Project will make a meaningful contribution to the 550MW identified in the RES by providing up to 57.6MW of renewable wind energy generation to Clare's County Clare's Wind Energy targets.

5.4 Summary of Compliance with Planning Policy

In summary, the provision of renewable energy developments such as the Proposed Project is strongly supported by European, national, regional, and local policies and guidelines aimed at achieving the transition to a low carbon and climate-resilient economy, increasing renewable energy generation, and enhancing energy security. Specifically, the Proposed Project will contribute to achieving the target of generating 9GW of electricity from onshore wind and reducing GHG emissions by 80% by 2030 as set out in the CAP25.

At a European level, the Proposed Project will support Ireland in reaching its legally binding obligations as an EU Member State of achieving at least 42.5% renewable energy by 2030, as set out in REDIII.

The Proposed Project aligns with National Strategic Outcomes and Objectives outlined in the Revised NPF, particularly Objective 55, which seeks to promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050.

Regionally, the Proposed Project will support the future growth of renewable energy technology in the Southern Regional Assembly region as called for in the RSES which sets a clear objective to identify and capitalize on those opportunities associated with the transition to renewable energy generation.

Furthermore, REDIII and REPowerEU have emphasised the European recognition of transitioning away from fossil fuels and increasing the penetration of renewable energy sources into the electricity market. These will play a crucial role in raising awareness and encouraging countries to prioritize the development and adoption of renewable energy technologies.

Locally, the CCDP supports the Proposed Project as it sets out the need for Clare to transition to a low-carbon and climate-resilient County with a focus on renewable energy to increase the County's energy sustainability and security. Specifically, a strategic aim of the CCDP is to accelerate the delivery of onshore wind to 9GW, the Proposed Project will support the CCDP in this aim by being in an area deemed as a 'Strategic Area' and 'Acceptable in Principle' in the CCDP.

If the Proposed Project were not to proceed, the opportunity to capture this additional part of County Clare's valuable renewable energy resource would be lost, as would the prospect of contributing to European and national targets for the production and consumption of electricity from renewable resources and the reduction of greenhouse gas emissions. The opportunity to generate local employment and investment associated with the Proposed Project would also be lost.

6. CLIMATE ACTION AND LOW CARBON DEVELOPMENT ACT 2015 (AS AMENDED)

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

The Climate Act also incorporates the following key provisions:

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

Section 15(1) below places an obligation on public bodies to perform their functions in a manner which favours climate action, unless it is objectively impracticable to do so.

"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."

Having regard to these functions, **Table 6** below demonstrates how, in determining the applications for the Proposed Project, ACP would be performing its functions in a manner consistent with Section 15(1) of the Climate Act.

Table 6 Compliance with Section 15(1) of the Climate Act.

Section 15(1) Requirement	Proposed Project Compliance	Supporting Evidence	Conclusion
a) Most recent approved climate action plan	The Proposed Project will contribute directly towards the CAP25 goals of 9GW of wind energy by 2030 and renewable electricity share of 80% by 2030. Onshore wind is identified as being critical in the decarbonisation of the electricity and as such the Proposed Wind Farm should be considered in that regard.	› EIAR Chapter 2, Background, Section 2.2.2. › Planning Report, Table 3 - *EU, National & Regional Policy Objective and Compliance Summary.* › Planning Report, Appendix 1 *Relevant EU, International, National and Regional Planning Policy.*	A grant of permission would constitute the performance of ACP's functions in a manner consistent with CAP 25, insofar as is practicable.
b) Most recent approved national long term climate action strategy,	The Proposed Project will support the national long term climate action strategy as the development represents critical renewable energy infrastructure that will make a meaningful contribution to achieving the State's reduced emissions targets and the transition towards a climate resilient society	› EIAR Chapter 2, Background, Section 2.2. › Planning Report, Table 3 - *EU, National & Regional Policy Objective and Compliance Summary.* › Planning Report, Appendix 1 *Relevant EU, International, National and Regional Planning Policy.*	A grant of permission would constitute the performance of ACP's functions in a manner consistent with the most recent approved national long term climate action strategy, insofar as is practicable.

c) Most recent approved national adaptation framework and approved sectoral adaptation plans	the Proposed Project will aid Ireland in adhering to, or limiting the exceedance of, the country's carbon budgets. Currently, the electricity sector is rapidly approaching the designated sectoral ceiling of 20 Mt CO_2 eq for the first carbon budget period from 2020 to 2025. The national renewable energy targets and the carbon budgets are integral to the government's response to the climate crisis.	› EIAR Chapter 2, Background, Section 2.2. › Planning Report, Table 3 - *EU, National & Regional Policy Objective and Compliance Summary.*	A grant of permission would constitute the performance of ACP's functions in a manner consistent with the most recent approved national adaptation framework and approved sectoral adaptation plans, insofar as is practicable.
d) the furtherance of the national climate objective	The Proposed Project, consisting of 8 no. wind turbines and associated infrastructure aligns with national climate policy objectives. The Proposed Project will make a significant contribution to achieving the CAP 25 target of 9GW of onshore wind energy by the year 2030.	› EIAR Chapter 2, Background, Section 2.2. › Planning Report, Table 3 - *EU, National & Regional Policy Objective and Compliance Summary.*	A grant of permission would constitute the performance of ACP's functions in a manner consistent with the furtherance of the national climate objective insofar as is practicable.
e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State	The Proposed Project will support the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State through the generation of wind energy and displacing electricity that would otherwise be produced from fossil fuel sources.	› EIAR Chapter 2, Background, Section 2.2. › Planning Report, Table 3 - *EU, National & Regional Policy Objective and Compliance Summary.* › Planning Report, Appendix 1 *Relevant EU, International, National and Regional Planning Policy.*	A grant of permission would constitute the performance of ACP's functions in a manner consistent with the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State .

The implications for public bodies in exercising their functions in accordance with Section 15 of the Climate Act has been scrutinised by the Irish legal system. The legal analysis of Section 15 has arisen from a challenge to a decision of ACP to refuse planning permission for a wind farm in County Laois.

The Supreme Court issued a judgment on this matter on 4th February 2026 (Coolglass Wind Farm Limited v An Coimisiún Pleanála [2026] IESC 5) and which establishes that consenting authorities must make decisions in a manner *'consistent with'* the approved national long term climate action strategy, the approved national long term climate action strategy etc., *'in so far as is practicable'*.[1] This means that departure from climate objectives is permissible but only where there are genuine practical difficulties that make full alignment impracticable.

Consenting Authorities, such as ACP, must therefore meaningfully engage with national climate objectives when exercising their functions, including decision-making and must also demonstrate how those functions have been carried out in a manner consistent with, in so far as practicable, national climate objectives.

Taking these legal duties into account, the Commission is required to attribute significant weight to national climate policy and the delivery of renewable energy infrastructure, such as the Proposed Project, even where they materially contravene a statutory development plan, particularly when that plan is out of step with national policy.

At present, there are no mandatory legal requirements that preclude the Commission from granting permission for the Proposed Project. The Proposed Project is supported by local, regional and national policy and has been designed in accordance with the latest national guidance and best practice. It is located in a favourable area for wind energy development, and it has also been demonstrated, in the EIAR and NIS, that the Proposed Project will not give rise to any significant adverse effect on the environment or on the integrity of European Sites.

Having regard to these matters, it is considered that the Commission can exercise its planning judgement to determine the application in a manner which is consistent with the achievement of national and EU policy goals, in accordance with its statutory duty under Section 15 of the Climate Act.

[1] *Coolglass Wind Farm Limited v An Coimisiún Pleanála [2026] IESC 5, para.26.)*

7. PLANNING ASSESSMENT

The Proposed Project has been subject to a rigorous design process informed by a comprehensive planning and environmental assessments and surveys, which have collectively concluded that the Proposal is in line with proper planning and sustainable development of the area. The Proposed Project has been designed in compliance with the Guidelines (DoEHLG, 2006). It is considered that the Proposed Project will comply with potential future guidelines as the noise emissions and shadow flicker assessment are controllable via inbuilt turbine technologies.

Specifically, there are no significant environmental impacts associated with the Proposed Project during the construction, operational or decommissioning phases of the development nor will it have any significant effects on any European Sites. Any potential environmental impacts can be addressed through standard mitigation measures and residual impacts will not be significant.

Accordingly, the following section provides a planning assessment of the Proposed Project under a number of key material considerations. This includes an assessment of the principle of development, followed by an assessment of the key environmental topics covered in the EIAR, which together inform the overall planning assessment of the Proposed Project. These considerations including the following headings:

- Residential Amenity
- Biodiversity
- Ornithology
- Land, Soils and Geology
- Hydrology and Hydrogeology
- Air Quality
- Climate
- Landscape and Visual Impact Assessment
- Archaeology and Cultural Heritage
- Material Assets

7.1 Principle of Development

The principle of development is considered to be acceptable at this location, having regard not only to its alignment with all levels of Planning Policy, including International, National, Regional and Local Planning Policy Frameworks, but also in the context of binding climate change obligations, the Proposed Project Design Process and relevant environmental requirements.

Policy Context

At an International and National Level, the Proposed Project will make a meaningful contribution towards achieving the transition to a low-carbon economy and climate resiliency, increasing renewable energy generation, and enhancing energy security. It will contribute directly towards the CAP25 goals of 9GW of wind energy by 2030 and renewable electricity share of 80% by 2030.

At a Regional Level, the Proposed Project will strengthen the role of the Southern Region as a leader in the renewable energy generation and in doing so, will support the transition to a climate resilient society.

Locally, the CCDP supports the Proposed Project as it sets out the need for Clare to transition to a low-carbon and climate-resilient County with a focus on renewable energy to increase the County's energy sustainability and security. Specifically, a strategic aim of the CCDP is to accelerate the delivery of onshore

wind to 9GW, the Proposed Project will support the CCDP in this aim through its location in an area deemed as a *'Strategic Area'* and *'Acceptable in Principle'* in the CCDP.

Obligations of Consenting Authorities under the Climate Act

In relation to the Climate Act, as set out in Section 6 of this Planning report, Consenting Authorities must meaningfully engage with national climate objectives when exercising their functions, including decision-making and must also demonstrate how those functions have been carried out in a manner consistent with, in so far as practicable, national climate objectives.

Taking these legal duties into account, the Commission is required to attribute significant weight to national climate policy and the delivery of renewable energy infrastructure, such as the Proposed Project, even where they materially contravene a statutory development plan, particularly when that plan is out of step with national policy.

At present, there are no mandatory legal requirements that preclude the Commission from granting permission for the Proposed Project.

Having regard to these matters, it is considered that the Commission can exercise its planning judgement to determine the application in a manner which is consistent with the achievement of national and EU policy goals, in accordance with its statutory duty under Section 15 of the Climate Act.

Detailed Constraints Exercise

A detailed analysis of site-specific constraints was carried out in order to inform the placement of the proposed infrastructure.

The ecological assessment of the Proposed Wind Farm site encompassed habitat mapping and extensive surveying of birds and other fauna. This assessment, as described in **Chapters 6 and 7** of the EIAR relating to Biodiversity and Ornithology, optimised the decision on the siting of proposed turbines and the carrying out of any development works, such as the construction of roads.

The hydrological and geotechnical investigations of the Proposed Wind Farm site examined the proposed locations for turbines, roads and other components of the Proposed Project, such as the construction compound. Where specific areas were deemed unsuitable for the siting of turbines or roads, etc., alternative locations were proposed and assessed, taking into account the areas already ruled out by constraints.

The turbine layout for the Proposed Wind Farm has also been informed by the results of noise, landscape and visual considerations and the separation distance to be maintained between turbines. Thus, the baseline environmental assessment of the site and wind farm design was an iterative process, where findings at each stage of the assessment were used to further refine the design, always with the intention of minimising the potential for environmental impacts.

The development of the final Proposed Wind Farm layout has resulted following feedback from the various studies, investigations and assessments carried out as well as ongoing negotiations and discussions with landowners and the local community. This final design is regarded as optimal as identified constraints are avoided while also maximising the site's development potential.

Appropriate Assessment

To support ACP in carrying out their Appropriate Assessment, an Appropriate Assessment Screening Report and Natura Impact Statement (NIS) have been prepared for the Proposed Project. This report has been prepared to provide the competent authorities with the information necessary to complete an

Appropriate Assessment screening and an Appropriate Assessment for the Proposed Project in compliance with Article 6(3) of the Habitats Directive.

The NIS concludes that the Proposed Project, individually or in-combination with other plans or projects, will not adversely affect the integrity of any European Site.

It is therefore judged that, provided the Proposed Project is constructed and operated in accordance with the design, best practice and mitigation that is described within this application, significant residual impacts on biodiversity, flora and fauna will not occur. The biodiversity enhancement measures outlined for the Proposed Project will result in an improvement of the existing ecological conditions of the Site.

7.1.2 Conclusion

In summary, the Proposed Project is a type of development which is specifically required to aid the State to meet our binding climate targets and obligations at a National and International level. It is demonstrably supported at all levels of planning policy and is located within an area identified at a local level as the most appropriate location within the County for the development of renewable energy.

The Proposed Project provides the opportunity to realise the valuable renewable energy resource. If the Proposed Project were not to proceed the opportunity to capture this additional part of Co. Clare's valuable renewable energy resource would be lost, as would the opportunity to contribute to meeting Government and EU targets for the production and consumption of electricity from renewable resources and the reduction of greenhouse gas emissions.

In this regard, and subject to compliance with all relevant environmental and ecological considerations as set out in the EIAR and NIS, the principle of development of the Proposed Project is considered to be wholly acceptable and appropriate at this location.

7.2 Key Environmental Considerations

Table 7 provides a summary of the of the Proposed Project under these key material environmental considerations and identifies the relevant chapters of the EIAR where they are specifically addressed.

Table 7: Relevant chapters of the EIAR referring to key material considerations

Consideration	Summary	Relevant EIAR Chapter
Residential Amenity	• **Noise Impact**: The EIAR confirms that operational noise from the Proposed Project will comply with the noise limit criteria at all Noise Sensitive Locations as per the Guidelines (DoEHLG, 2006), and is capable of adhering to future noise measures as it is controllable via inbuilt turbine technologies. • **Shadow Flicker**: The EIAR confirms shadow flicker levels will meet the Guidelines (DoEHLG, 2006) limits at all Sensitive Receptors and can be adjusted to align with the Draft Guidelines (DoHPLG, 2019) if they are adopted during the planning process. • **Visual Amenity**: The visual and landscape assessment finds no significant effects on sensitive receptors, with overall visibility of the Proposed Project considered not significant.	**Chapter 5 – Human Beings** **Chapter 12 – Noise** **Chapter 13 – Landscape**
Biodiversity	Following consideration of the residual effects (post mitigation) it is concluded that the Proposed Project will not result in any significant effects on any of the identified Key Ecological Receptors (KER). No significant effects on receptors of European, national, or county importance were identified. The potential for effects on the European Designated Sites is fully described in the Natura Impact Statement (NIS) that accompanies this application. The NIS concludes that in view of best scientific knowledge and on the basis of objective information, the Proposed Project either individually or in combination with other plans or projects, is not likely to have significant effects on any European Sites.	**Chapter 6 – Biodiversity**
Ornithology	Following consideration of the residual effects (post-mitigation), it is concluded that the Proposed Project will not result in any significant effects on any of the identified Key Ornithological Receptors (KOR). No significant effects on receptors of European, national, or county importance were identified. Provided that the Proposed Project is constructed, operated, and decommissioned in accordance with the design and best practice mitigation measures that are described within this application, significant individual or cumulative effects on the identified KORs are not anticipated.	**Ch.6 – Biodiversity** **Ch.7 – Ornithology**
Land, Soils, & Geology	With the implementation of the mitigation measures outlined in the EIAR, no significant impacts on the land, soil, and geology of the site of the Proposed Project will occur during construction, operation, or during decommissioning phase.	**Ch.8 – Geology & Soils**

	An assessment of potential cumulative effects associated with the Proposed Project and other developments on land, soils and geology confirms there will be no significant cumulative effects on land, soil, and geology as a result of the Proposed Project.	
Hydrology & Hydrogeology	No significant effects to surface water (quality and flows) and groundwater (quality and quantity, and any local groundwater wells) will occur as a result of the Proposed Project provided the proposed mitigation measures are implemented. An assessment of potential cumulative effects associated with the Proposed Project and other developments on the hydrological and hydrogeological environment has been completed. With the implementation of the mitigation measures detailed in the EIAR, the cumulative assessment found that there will be no significant effects on the hydrological and hydrogeological environments. No significant effects on the water environment will occur during the construction, operation or decommissioning of the Proposed Project.	**Ch.9- Water**
Air Quality	The cumulative air quality assessment for the Proposed Project indicates that, when considered alongside other existing or planned developments in the area, there will be no significant negative cumulative impacts on air quality across all project phases. The Proposed Project is projected to have a net positive cumulative impact on air quality, aligning with regional and national environmental objectives.	**Ch.10 – Air Quality**
Climate	Residual effects of greenhouse gas emissions arising from the construction phase of the Proposed Project will have a short-term imperceptible negative effect. However, once emitted to the atmosphere, the greenhouse gas emissions that will arise from construction phase activities will have a permanent imperceptible negative effect on Climate. The Proposed Project will displace carbon dioxide from fossil fuel-based electricity generation, over the proposed 35-year lifespan of the Proposed Wind Farm. Therefore, while there will be greenhouse gas emissions associated with the construction of the Proposed Project, this will take place under the Electricity sector emissions ceiling and will be offset by the operation of the Proposed Wind Farm within its operational life.	**Ch.11 - Climate**

Landscape & Visual Impact Assessment	There are no significant landscape effects have been identified and, overall, the visibility of the Proposed Project throughout the LVIA Study Area is deemed to have no significant effects. For cumulative turbines located within the wider LVIA Study Area, there are limited locations where the proposed turbines will be visible in combination or succession views. However, due to the distance involved, no significant cumulative visual effects are expected to arise.	**Ch.13Landscape**
Archaeology & Cultural Heritage	No significant direct or indirect effects to the recorded cultural heritage resource as a result of the Proposed Project have been identified. Where potential direct effects to sub-surface archaeology have been identified appropriate mitigation measures are proposed in order to ameliorate this potential effect.	**Ch.14 Cultural Heritage**
Material Assets	The magnitude of the increase in traffic volumes experienced on the surrounding network is identified during the various construction stages of the Proposed Project. A preliminary traffic management plan is also provided in **Chapter 15** of the EIAR aimed at minimising the traffic impact on the local highway network. During the construction phase of the Proposed Project the extent of the impact identified, ranges from a slight to moderate and temporary negative effect. Once the Proposed Project is operational the traffic impact created by maintenance staff will be imperceptible. The residual effect for the decommissioning phase will be less than that outlined for the construction stage and will be slight to imperceptible.	**Ch. 15 Material Assets**

8. CONCLUSION

The provision of wind energy developments such as Cahermuphy West is strongly supported by European, National, Regional and Local policies and guidelines aimed at achieving the transition to a low-carbon and climate-resilient economy, increasing renewable energy generation, and enhancing energy security. Specifically, the Proposed Project will contribute to achieving the target of generating 9GW of electricity from onshore wind and reducing GHG emissions by 51% in 2030 as set out in CAP25.

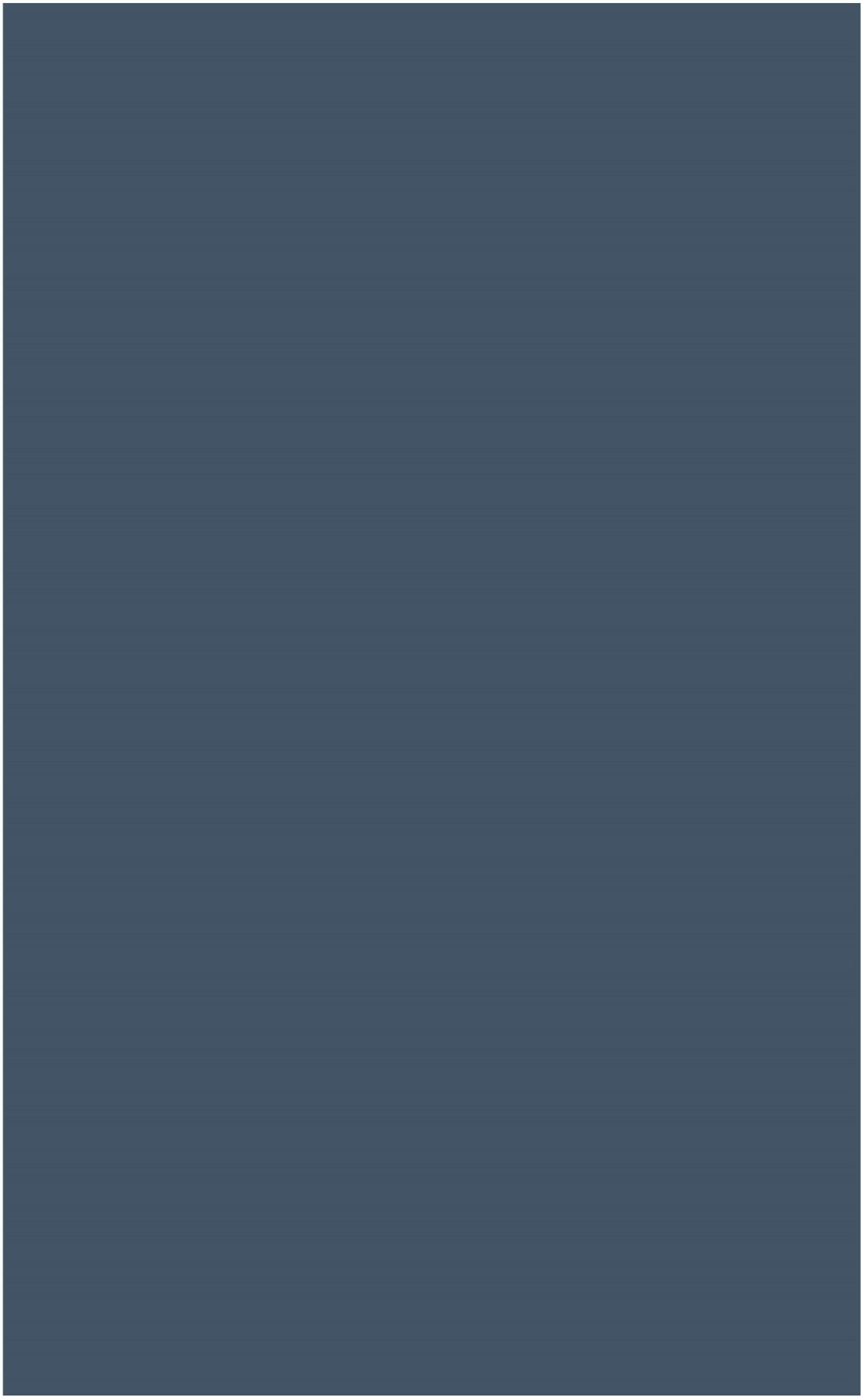
The Proposed Project aligns with National Strategic Outcomes and Objectives outlined in the National Planning Framework First Revision, particularly Objective 55, which seeks to promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050.

CAP25 estimates that an 8-times increase in renewable energy deployment to 2.3GW annually is required between 2024 and 2030 to reach climate and energy targets. CAP25 reaffirms the ambitious targets for renewable electricity share of 80% by 2030, which is to be achieved, in part, by the deployment of a targeted 9GW of onshore wind by 2030. To achieve this, greater alignment between local plans and national and regional renewable energy targets is urgently required. If permitted, the Proposed Wind Farm will add approximately 57.6MW of renewable, clean energy to our national wind energy capacity. This will not only contribute to the decarbonisation of the electricity sector but will play a role in the decarbonisation of other sectors and the transition to a low carbon, climate resilient economy.

In relation to the Climate Act, Consenting Authorities must meaningfully engage with national climate objectives when exercising their functions, including decision-making and must also demonstrate how those functions have been carried out in a manner consistent with, in so far as practicable, national climate objectives. Taking these legal duties into account, the Commission is required to attribute significant weight to national climate policy and the delivery of renewable energy infrastructure, such as the Proposed Project. Having regard to these matters, it is considered that the Commission can exercise its planning judgement to determine the application in a manner which is consistent with the achievement of national and EU policy goals, in accordance with its statutory duty under Section 15 of the Climate Act.

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

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



APPENDIX 1

RELEVANT EU, INTERNATIONAL, NATIONAL AND REGIONAL PLANNING POLICY

Planning and Environmental Consultants

1.

APPENDIX 1

Relevant EU, International, National and Regional Planning Policy

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1. RELEVANT EU, INTERNATIONAL, NATIONAL AND REGIONAL PLANNING POLICY

1.1 International Policy and Targets

United Nations Framework Convention on Climate Change

In 1992, countries joined an international treaty, the United Nations Framework Convention on Climate Change (UNFCCC), as a framework for international efforts to combat the challenge posed by climate change. The UNFCCC seeks to limit average global temperature increases and the resulting climate change. 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.

Kyoto Protocol

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

In Doha, Qatar, on 8th December 2012, the *"Doha Amendment to the Kyoto Protocol"* was adopted. 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.

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.

COP21- Paris Agreement

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

capacities of each country. The IPCC's 6th Assessment Report (2021) further collaborates this need to limit any increase in global average temperature to 1.5°C, stating that (underlined for emphasis),

> *"Humanity has emitted 2,560 billion equivalent tons of CO_2 since 1750, and we only have a budget of 500 more if we want to limit warming to 1.5°C.*
>
> *By following a trajectory of very low GHG emissions (SSP1-1.9), the threshold of 1.5°C will be reached in the short term, between 2021 and 2040, before being very slightly exceeded (1.6°C anticipated over the period 2041-2060) then respected in the long term (1.4°C anticipated over the period 2081-2100).*
>
> *Everything is not lost, but we must pursue the Paris Agreement's most ambitious goal of limiting warming to 1.5°C."*

COP25- Madrid

COP25, the 25th session of the COP, was held between the 2nd and 13th of December 2019 in Madrid.

The conference was characterised by repeated warnings from civil society (National Government Organisations and corporates) on emerging evidence and scientific consensus on climate change risk. Specifically, it was noted that there is only c. '10 years left' before the opportunity of limiting global warming to 1.5°C is no longer feasible'. As such, the only remaining approach to limiting rising global temperatures is a '7.6% reduction of global GHG emissions every year between 2020 and 2030, and to reach net zero emissions by 2050'. However, consensus was not achieved between States on finalising the operating rules of the Paris Agreement and to ensure that it became operational by 2020. Despite the lack of consensus on the above challenges, the COP25 did achieve more limited success with regard to the introduction of the "San Jose Principles for High Ambition and Integrity of International Carbon Markets", which sets out the framework on which a robust carbon market should be built. These principles were supported by 23 EU nations, including Ireland, as well as countries in Latin American, 5 no. Pacific Islands and 2 no. countries in the Caribbean.

COP26- Glasgow

COP26 took place in Glasgow, Scotland between the 31st October and 12th November 2021. The summit was centred around the fact that "*climate change is the greatest risk facing us all.*" The UK, as hosts for the summit, have developed a ten-point plan to deliver a green industrial revolution, seeking to lead the world in tackling and adapting to climate change.

The key items COP26 seeks to achieve are:

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

All world leaders at the summit confirmed the need to urgently address the gaps in ambition and work together to achieve climate action.

COP27- Egypt

COP27 took place in Sharm el-Sheikh from the 6th of November 2022 to the 20th of November 2022. COP 27 centred around three major topics:

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

The most significant outcomes from COP 27 are outlined below:

- **Phase down/out language:** In Glasgow the previous year, the final agreement was delayed due to the stance of China and India, among others, who were not comfortable with the 'phase out' of coal wording in the draft text. This led to the watering down of this commitment to a 'phase down' of coal use. The hope was that COP27 would work to include further language on coal and fossil fuel reduction efforts. However, the wider commitment to phase out all fossil fuels, led by India, and backed by the US and the EU, was taken out and can be marked as the biggest disappointment of COP27.

- **1.5°C Pathway:** The 1.5°C warming limit has been retained, and reassurances have been made that there is no room for backsliding. It gives the key political signals that the phase down of all fossil fuels is happening. There has been the setting of a workplan for 2023 to help articulate the nature and components of a global collective goal on adaptation and resilience and how it can be formatted in a way to take into account the Global Stocktake.

- **Climate Finance & Loss and Damage:** There has been the launch of an initiative by the V20 and G7 known as the Global Shield Against Climate Risk (GSACR). The intention of this initiative has been framed almost as an insurance policy backed by the World Bank to prepare and protect those most vulnerable to climate change disasters. The initiative seeks to reform the current climate finance model currently operating in the form of loans, typically with high interest rates and repayment requirements. The beginnings of a framework to compensate for the unequal distribution of harm that has been caused by climate change and the unequal contributions of emissions has also been put in place.

COP 28 – United Arab Emirates

The 28th session of the COP to the UN Framework Convention on Climate Change, was held in Dubai from 30 November to 13 December 2023. The main objective of COP was to assess the progress made by all parties on the implementation of the 2015 Paris Agreement through the concluding phase of the 'global stocktake', which began after COP26 in 2021.

The outcomes from COP 28 are as follows:

- **Loss and Damage:** Initiated at COP 27, the fund for the loss and damage to developing countries due to climate change was established. Unlike other forms of climate finance, there is no firm obligation for developed countries to pay into the fund. The loss-and-damage fund being launched was marked as a substantial outcome had been achieved during the COP28 opening session.

- **Fossil Fuel Phase-Out & Increasement of Renewable Energy Capacity:** Another result of the COP 28 was the adoption of a fossil fuel phase-out agreement which commits parties to the transition away from the fossil fuels in energy systems. The agreement calls for a tripling of renewable energy capacity globally by 2030. This was the first time that the COP explicitly addressed the need to end the use of fossil fuels.

- **Adaptation Framework:** An important decision to come out of COP 28 was a "framework" that is meant to guide nations in their efforts to protect their people and ecosystems from climate change. The 'global goal on adaptation' was first established by the Paris Agreement in 2015 but received little attention up until COP 26. Developing countries pushed for

financial adaptation targets to be introduced, however, ultimately no quantifiable financial targets were included in the final text.

COP29 – Azerbaijan

The 29th COP of the UNFCCC (COP29) was held in Baku, Azerbaijan, from November 11th 2024 to November 22nd 2024.

COP29 focused on accelerating global efforts to address climate change, in particular global efforts related to climate finance. The New Collective Quantified Goal on Climate Finance (NCQG) was agreed in the final days of COP; while developing countries advocated for at least USD 1 trillion annually by 2035, developed nations agreed to triples finance to developing countries, with commitments increasing from USD 100 billion annually to USD 300 billion annually by 2035. The NCQG has already drawn criticism for being inadequate given the global financial need of developing nations to mitigate and adapt to climate change effects and due to its lack of strong terminology in relation to the requirements of developed nations and detailed implementation strategies.

At COP29, significant progress was made in the discussions surrounding carbon markets, with nearly 200 nations agreeing on critical rules under Article 6 of the Paris Agreement. These rules aim to establish an UN-backed international carbon market. The adoption of these rules is seen as a crucial step towards operationalising a robust and credible carbon market. Despite the advances, concerns were expressed about the potential for weak governance and risks of exploitation in the system; these issues must be addressed to ensure the market's full functionality.

COP 30 – Belém

The 30th COP of the UNFCCC (COP 30) is set to be held in Belém, Brazil in November 2025.

COP30 focused on accelerating global efforts to address climate change, in particular global efforts related to climate finance and the just transition. A pledge was made at COP30 to triple climate adaptation finance by 2035. This increases adaptation finance to USD 120 billion per year, as part of the broader USD 300 billion per year in climate finance, known as the NCQG, which was agreed at COP29. This has drawn criticism as it is deemed to be far below the needs of developing countries.

Further to this, a list of 59 indicators for the advancement of global adaptation was adopted at COP30. There has been some criticism of these as it is argued that compromises that were included will make them more difficult to make operational.

At COP30, the EU renewed its commitment to the COP28 pledges to transition away from fossil fuels, to triple renewable energy capacity and to double energy efficiency by 2030.

European Green Deal – European Climate Law (2021)

The European Green Deal, initially introduced by the European Commission in December 2019, sets out the 'blueprint' for a transformational change of the 27-country bloc from a high- to a low-carbon economy, without reducing prosperity and while improving people's quality of life, through cleaner air and water, better health and a thriving natural world. The Green Deal is intended to work through a framework of regulation and legislation setting clear overarching targets, e.g. a **bloc-wide goal of net zero carbon emissions by 2050 and a 55% cut in emissions by 2030 (compared with 1990 levels**). This is a substantial increase compared to the existing target, upwards from the previous target of at least 40% (2030 Climate & Energy Framework), and furthermore, these targets demonstrate the ambition necessary to keep the global temperature increase to well below 2°C and pursue efforts to keep it to 1.5°C as per the Paris Agreement. With regard to the energy sector, the Green Deal focuses on 3 no. key principles for the clean energy transition, which will help reduce greenhouse gas emissions and enhance the quality of life for citizens:

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

The European Climate Law[1] writes into law the objectives set out above in the European Green Deal for Europe's economy and society to become climate-neutral by 2050. Climate neutrality by 2050 means achieving net zero greenhouse gas emissions for EU countries as a whole, mainly by cutting emissions, investing in green technologies and protecting the natural environment. The Climate Law includes:

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

The law aims to ensure that all EU policies contribute to this goal and that all sectors of the economy and society play their part. All 27 no. EU Member States have committed to turning the EU into the first climate neutral continent by 2050. One third of the 1.8 trillion-euro investments from the Next Generation EU Recovery Plan, and the EU's seven-year budget, will finance the European Green Deal. On 14th July 2021, the European Commission adopted a set of proposals[2] 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.

Achieving these emission reductions in the next decade which is crucial to Europe becoming the world's first climate-neutral continent by 2050 would clearly be assisted by the Proposed Project.

1.2 EU Renewable Energy Policy

Renewable Energy Directive

The Renewable Energy Directive is the EU legal framework for the development of renewable energy across all sectors of the EU economy, supporting clean energy cooperation across EU countries. Since the introduction of the Renewable Energy Directive (RED) in 2009, it has undergone several revisions since then and these revisions. Since its adoption in 2009, the share of renewable energy sources in energy consumption has increased from 12.5% in 2010 to 23% in 2022[3]. Of the 27 EU member states the lowest proportions of renewables were recorded in Ireland (13.1%). Crucially, the Renewable Energy Directive sets the overall target for renewable energy in the EU.

RED I - 2009

Renewable Energy Directive 2009 (RED I - the original RED) (2009/28/EC), adopted in 2009, set binding targets for EU member states to achieve a 20% share of renewable energy in final energy consumption by

[1] *Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ('European Climate Law') published in the Official Journal on 9 July 2021 and came into force on 29 July 2021.*
[2] *'Fit for 55': delivering the EU's 2030 Climate Target on the way to climate neutrality (July 2021)*
[3] *https://ec.europa.eu/eurostat/en/web/products-eurostat-news/w/ddn-20231222-2*

2020. It established a framework for national renewable energy action plans, sustainability criteria for biofuels and bioliquids, and a system of guarantees of origin for renewable energy.

RED II – 2018

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

RED III – 2023

In November 2023, a revision of the Renewable Energy Directive[4] (RED III), came into force. RED III increases the EU wide renewable energy target from 32% set under the previous revision of the directive to 42.5%, with an ambition to reach 45% by 2030. The increase was proposed under the publication of REPowerEU plan in May 2022. The Directive also introduces specific targets for Member States in the industry, transport, and building (district heating and cooling) sectors.

Under RED III, EU member states must identify areas for the acceleration of renewables where projects will undergo a simplified and fast-track procedure. The deployment of renewables will also be of "*overriding public interest*" in order to limit the number of legal challenges on new renewable energy installations. These measures came in response to REPowerEU which found that permitting is the biggest bottleneck for deploying wind at scale, with approximately 80 GW of wind power capacity stuck in permitting procedures across Europe.

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

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

REPowerEU Plan

The European Commission has proposed an outline of a plan to make Europe independent from Russian fossil fuels including oil and gas, due to the high and volatile energy prices, and security of supply concerns following Russia's unprecedented military attack on Ukraine. At the time of publication, the EU imported 90% of its gas consumption, with Russia providing around 45% of those inputs. Russia also accounted for around 25% of oil and 45% of coal imports. Phasing out dependence on fossil fuels can be done well before 2030, increasing the resilience of the EU-wide energy system based on two pillars:

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

With full implementation of the measures in REPowerEU plan, at least 155 billion cubic metres of fossil gas use could be removed, which is equivalent to the volume imported from Russia in 2021. Nearly two thirds of that reduction can be achieved within a year. A part of this plan includes *'Speeding up*

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

renewables permitting to minimise the time for roll-out of renewable projects and grid infrastructure improvements.' This will make the sector more efficient and reach the set goals faster.

As such, it is submitted that the Proposed Project is strongly supported by EU energy policy. Many of the measures outlined in REPowerEU have been incorporated into national Policy through the National **Energy Security Framework, which was published by the Government in April 2022**

2030 Climate and Energy Framework

The 2030 Climate and Energy Framework (adopted by EU leaders in October 2014) represents the current governance system underpinning EU renewable energy policy. The framework defines EU wide renewable energy targets, which builds on the 2020 climate and energy package:

- A binding commitment at EU level of at least 40% domestic Green House Gas reduction by 2030 compared to 1990;
- An EU wide, binding target of at least 27% renewable energy by 2030; and
- An indicative EU level target of at least 27% energy efficiency by 2030.

Effort sharing 2021-2030

The European Commission Effort Sharing Regulation on the allocation of national targets for greenhouse gas emissions for the period 2021-2030 was adopted in 2018. The Effort Sharing legislation forms part of a set of policies and measures on climate change and energy that will help move Europe towards a low-carbon economy and increase its energy security. Under the current Regulation, the national targets will collectively deliver a reduction of around 10% in total EU emissions from the sectors covered by 2020 and of 30% by 2030, compared with 2005 levels.

The proposal implements EU commitments under the Paris Agreement on climate change (COP21), discussed above in Section 2.1.1.1, and marks an important milestone in the allocation to Member States of a package of climate targets formally adopted as part of the 2030 Climate and Energy Framework.

Energy Roadmap 2050

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

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

The analysis found that decarbonising the energy system is technically and economically feasible. The Roadmap notes that all scenarios show the biggest share of energy supply technologies in 2050 comes from renewables. In this regard, it should be noted that the Climate Change Advisory Council states within their 2020 Annual Review (September 2020) that, "*while the share of renewable electricity generation, particularly wind, is increasing [in Ireland], the [overall] pace of decarbonisation of the [electricity generation] sector needs to accelerate*", as it is not compatible with a low-carbon transition to 2050.

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

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

1.3 National Climate Policy

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

In March 2019, the Joint Committee on Climate Action Change released a report detailing a cross-party consensus for action. The report in its introduction states that *"Irelands performance in meeting international obligations has to date been poor"* (refer to *'Emissions Projections for Ireland'* below). The Report highlights on-going concern regarding emission projections and growing evidence that Ireland is off track in meeting its 2030 targets under the relevant the EU Directives.

The report states that the transformation of Ireland's energy system will be required for the country to meet its future 2030 and 2050 GHG emission targets; specifically, in order to reach net zero emissions by 2050, Ireland will be required to fully decarbonise electricity generation. Therefore, there is a clear incentive for developing, and safeguarding, Ireland's capacity in renewable energies and renewable electricity. Since this report was published, the Climate Action and Low Carbon Development (Amendment) Act 2021 has been enacted and there have been recent progress / future scenario assessments (e.g. EirGrid's *'Ten-year Generation Capacity Statement 2023–2032'*[5] (January 2024).

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

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

The Programme for Government – Securing Ireland's Future was published by the Department of the Taoiseach, on 21st January 2025. This comprehensive document places specific emphasis on climate change and ensuring a sustainable future. The programme states that the government are committed to achieving 80% renewable electricity by 2030, with a push to achieve a net zero emissions by the year 2050.

The 2025 Programme for Government outlines several key strategies for Ireland to achieve its ambitious climate targets. These strategies are designed to ensure a sustainable future and transition to a low-carbon economy. Some of the main points include:

- Carbon Tax – the revenue generated from this tax will fund various climate initiatives.
- Energy Efficiency – improving the energy performance of homes and buildings, as a major focus.
- Renewable Energy – Investments in renewable energy sources, such as wind and solar are prioritised. These investments are crucial for transitioning to a low-carbon economy.

[5] https://cms.eirgrid.ie/sites/default/files/publications/19035-EirGrid-Generation-Capacity-Statement-Combined-2023-V5-Jan-2024.pdf

- Public Sector Mandate – the public sector is committed to reducing carbon emissions by 51% by 2030 and achieving carbon neutrality by 2050.
- Green Jobs – the government plans to create green jobs and support the industries that contribute to environmental sustainability.
- Sustainable Transport – the promotion of sustainable transport options, including electric vehicles and improved public transport infrastructure will reduce emissions in the sector and encourage environmentally friendly travel.

The Programme for Government 2025 also outlines details around onshore wind targets and how to achieve them. The government aims to achieve 9GW of onshore wind capacity by 2030, this will be done by the following:

- Repowering Existing Wind Farms – policy will be developed to support the repowering and extension of the life of existing wind farms, including upgrading older farms.
- Community Energy Projects – the plan includes 500MW of community energy projects to support local renewable energy initiatives. This will involve communities in the transition to renewable energy ensuring local benefits and engagement.
- Grid Development – enhancements to the grid will accommodate the increased generation of wind energy.

The Climate Action and Low Carbon Development (Amendment) Act (2021)

The Climate Action and Low Carbon Development (Amendment) Act 2021, which was signed into law on the 23rd July 2021, legally binds Ireland to achieve net-Zero emissions no later than 2050, and to a **51% reduction in emissions by the end of this decade**.

The Act provides the framework for Ireland to meet its international and EU climate commitments and to become a leader in addressing climate change. As indicated by the premise of the legislation, the reduction of emissions is a key proponent of the Climate Action and Low Carbon Development (Amendment) Act 2021 and incorporates the following key provisions:

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

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

The Proposed Project represents a significant opportunity for this site to be a nationally important wind energy generator, contributing to the 51% reduction in emissions being sought, which is as outlined above a legally binding requirement. The Proposed Project is therefore considered compliant with the relevant

policies and objectives set out at both the European (e.g. European Green Deal) and National tiers of governance in this regard.

Carbon Budgets

To achieve the 51% emissions reduction target, the Climate Act, requires the Climate Change Advisory Council (CCAC) to recommend a proposed programme of economy-wide 5-year Carbon Budgets to the Minister for the Environment, Climate and Communications. The first national carbon budget programme proposed by the Climate Change Advisory Council, approved by Government and adopted by both Houses of the Oireachtas in April 2022 comprises three successive 5-year carbon budgets[6]. The total emissions allowed under each budget are shown in Table 1 below.

Table 1:Proposed Carbon Budgets of the Climate Change Advisory Council

	2021 – 2025 Carbon Budget 1	2026 – 2030 Carbon Budget 2	2031 – 2035 Provisional Carbon Budget 3
	All Gases		
Carbon Budget (Mt CO_2eq)	295	200	151
Annual Average Percentage Change in Emissions	-4.8%	-8.3%	-3.5%
The figures are consistent with emissions in 2018 of 68.3 Mt CO_2eq reducing to 33.5 Mt CO_2eq in 2030, thus allowing compliance with the 51% emissions reduction target by 2030.			

Climate Action Plan 2023

The Climate Action Plan 2023 (CAP23) was published in December 2022 by the Department of the Environment, Climate and Communications. This outlines the actions required to 2035 and beyond to meet Ireland's commitment to becoming carbon neutral by 2050. CAP23 sets out a roadmap to deliver on Irelands climate ambition and is aligned to ensure that Ireland achieves its legally binding target (the Climate Action and Low Carbon Development (Amendment) Act 2021) of net-zero greenhouse gas emissions no later than 2050. A target aims for a reduction in emissions of 51% over the period 2018 to 2030 and in doing so, prevent / mitigate the potentially devastating consequences of climate change on Ireland's environment, society, economic and natural resources.

The CAP23 states that to do so, Ireland must harness the untapped indigenous renewable resources and has a target of achieving 80% of energy being produced from renewable sources by 2030 (unchanged from the previous Climate Action Plan, 2022) with a target of 9GW of that being produced by onshore wind. Measures set out in CAP23 to achieve these targets include to 'accelerate and increase the deployment of renewable energy to replace fossil fuels' (Section 12.1.4 CAP23). It is clear from the message and ambition of CAP23 that the drive to deploy renewable energy projects such as the Proposed Project in Ireland are critical to achieving the aims and objectives of CAP23 including the 9GW of onshore wind energy by 2030 and carbon neutrality by 2050.

The measures set out for the electricity sector include *inter alia*:

[6] *Climate Change Advisory Council Carbon Budget Technical Report (October 2021)* https://www.gov.ie/en/publication/9af1b-carbon-budgets/

- Reduce annual CO2eq. emissions from the sector to 3 MtCO2eq by 2031 (75% reduction compared to 2018);
- Accelerate and increase the deployment of renewable energy to replace fossil fuels;
- Accelerate the delivery of onshore wind, offshore wind and solar through a competitive framework to reach 80% of electricity demand from renewable energy by 2030;
- Target 6GW of onshore wind and up to 5 GW of solar by 2025;
- Target 9 GW onshore wind, 8 GW Solar and at least 5 GW of offshore wind by 2030;
- Align the relevant constituent elements of the planning and permitting system to support accelerated renewable energy development, supported by national policy and associated methodologies to inform regional and local planning policies, noting that Development Plans are obliged to set out objectives to facilitate energy infrastructure.

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

Climate Action Plan 2024

The Climate Action Plan 2024 (CAP 24) builds on CAP 23 by refining and updating the status of the actions required to deliver the decarbonisation required under the carbon budgets and sectoral emissions ceilings. The renewable electricity generation targets are unchanged from the CAP 23 (9GW of onshore wind & 80% renewable electricity share).

The CAP 24 includes the latest trends in the electricity sector:

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

The CAP 24 acknowledges the urgency and importance of the decarbonising the electricity sector. The plan states:

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

The CAP 24 identifies the alignment of local and national policy as critical to accelerate renewable

energy rollout.

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

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

Climate Action Plan 2025

The Climate Action Plan 2025 (CAP25) represents the third statutory update to Ireland's climate roadmap under the Climate Action and Low Carbon Development 2015 (as amended). Building on the foundations laid by previous plans, CAP25 refines and strengthens the strategies necessary to deliver Ireland's legally

binding carbon budgets and sectoral emissions ceilings. It sets out a clear trajectory to reduce greenhouse gas emissions by 51% by 2030 and to achieve climate neutrality no later than 2050.

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

1.4 National Renewable Energy Policy

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

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

Following on from an extensive consultation process, a Government White Paper entitled 'Ireland's Transition to a Low Carbon Energy Future 2015-2030' was published in December 2015 by the (then) Department of Communications, Energy and Natural Resources ("DCENR"). This Paper provides a complete energy update and a framework to guide policy up to 2030. The Paper builds upon the White Paper published in 2007 and takes into account the changes that have taken place in the energy sector since 2007.

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

In this White Paper, the DCENR acknowledges that onshore wind is one of the cheapest forms of renewable energy in Ireland, stating that:

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

The Green Paper on Energy Policy in Ireland 2015-2030 was updated and republished in 2020 and updated again in January 2021. The updated Paper outlines that:

> *'The 2020 target of 40% RES-E is likely to require a total of 3,500-4,000 MW of onshore renewables generation capacity, compared to the 2,500 MW available at end December 2014, of which wind generation accounted for 2,200MW.* ***To achieve our target, the average rate of build of onshore wind generation will need to increase to up to 260 MW per year. The current rate of build is about 170 MW per year.'***

National Energy Security Framework

The National Energy Security Framework (DECC, April 2022) highlights clearly the impacts the Russian invasion of Ukraine and the resulting war has had on Europe's energy system. The resulting decision by the European Union to phase out the import of Russian gas, oil and coal (REPowerEU) has brought to the fore the importance of security of supply and how energy policy is designed for long-term resilience. It takes account of the need to decarbonise society and economy, to reduce Ireland's emissions by 51% over the decade to 2030 and reach net zero emissions by 2050. According to the SEAI's Energy in Ireland (2021) report, oil accounts for 45% of Ireland's primary energy requirement making it one of the highest rates of oil dependency in the EU. The International Energy Agency, of which Ireland is a member country, includes a 10-point plan to cut oil use which calls for an acceleration in the deployment of wind and solar projects. Ireland's response per the Framework is set out over three themes:

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

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

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

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

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

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

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

Energy Security in Ireland to 2030 – Energy Security Package

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

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

The energy security package includes a range of measures to implement this approach by the prioritisation of the following:

1. *Reduced and Responsive Demand.*
2. *Renewables-Led System.*
3. *More Resilient Systems.*
4. *Robust Risk Governance.*

Independent research undertaken as part of the package, McCarthy Report[7], provides an analysis of developments in the electricity sector in Ireland. The McCarthy Report makes the following observation in relation to the consenting process:

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

A key finding from the technical analysis conducted as part of the energy security package is the interdependence of energy security on two essential pillars: 'harnessing our indigenous renewable energy resources at speed and at scale and the rapid electrification of energy demand'. As such, the energy security package provides additional measures to supplement the existing measures introduced under previously published government policy documents. Those additional measures most relevant to the Proposed Project are as follows:

"Action 10: To implement Planning and Consenting System Reforms and provide greater certainty to the sector."

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

The Proposed Project will significantly support the government's objectives in ensuring the State's energy security. The Proposed Project serves as a domestic renewable energy generator capable of providing clean electricity to the national electricity grid, contributing to a renewables-led system.

1.5 National Policy Context

The Planning and Development Act 2024

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

[7] *https://www.gov.ie/pdf/?file=https://assets.gov.ie/276441/eb496e01-5c01-4594-af09-74342b4ac971.pdf#page=null*

National Planning Framework: Project Ireland 2040

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

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

The NPF notes that the population of Ireland is projected to increase by approximately 1 million people by 2040 which will result in a population of roughly 5.7 million. This population growth will place further demand on both the built and natural environment. In order to strengthen and facilitate more environmentally focused planning at the local level, the NPF states that future planning and development will need to:

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

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

Also relevant to the Proposed Project, Ireland's national energy policy under **Objective 55** aims to:

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

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

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

National Planning Framework First Revision (2025)

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

There is an increased emphasis on the importance of the renewable energy development and infrastructure needed to support this. Chapter 9 of the First Revision NPF acknowledges that the "accelerated delivery of the additional renewable energy generation is... essential for Ireland to meet its climate targets." A number of new or amended National Policy Objectives (NPOs) have been proposed in order to achieve this objective as listed below:

- **rNational Policy Objective 69-** *Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions as expressed in the most recently adopted carbon budgets.*
- **National Policy Objective 70-** *Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a climate neutral economy by 2050.*
- **National Policy Objective 71-** *Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development.*
- **National Policy Objective 72-** *Support an all-island approach to the delivery of renewable electricity through interconnection of the transmission grid.*
- **National Policy Objective 73-** *Support the co-location of renewable technologies with other supporting technologies and complementary land uses, including agriculture, amenity, forestry and opportunities to enhance biodiversity and promote heritage assets, at appropriate locations which are determined based upon the best available scientific evidence in line with EU and national legislative frameworks.*
- **National Policy Objective 74-** *Each Regional Assembly must plan, through their Regional Spatial and Economic Strategy, for the delivery of the regional renewable electricity capacity allocations indicated for onshore wind and solar reflected in Table 9.1 below, and identify allocations for each of the local authorities, based on the best available scientific evidence and in accordance with legislative requirements, in order to meet the overall national target.*

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 1 Regional Renewable Electricity Capacity Allocations

- **National Policy Objective 75-** *Local Authorities shall plan for the delivery of Target PowerCapacity (MW) allocations consistent with the relevant Regional Spatial and Economic Strategy, through their City and County Development Plans.*

The First Revision NPF sets out regional renewable energy capacity allocations for wind and solar energy. The Proposed Project is situated within the Southern Region. As outlined in the strategic document each Regional Assembly will prepare a Regional Renewable Electricity Strategy (RRES), whereby additional

detail will be outlined on how the regional renewable electricity capacity allocations for the region can be achieved.

The First Revision NPF aligns itself with the national target of 9GW of onshore wind energy and with the policies and objectives of Local Authorities.

National Development Plan 2021- 2030

The National Development Plan 2021 – 2030 (NDP) was published on the 4th October 2021 and sets out the major public investment projects identified by Government which are to play a significant role in addressing the opportunities and challenges faced by Ireland over the coming years such as Covid-19, Brexit, housing, health, population growth, and most relevant to the Proposed Project, climate change. Reflecting on the recent publication of the IPCC's 6th Assessment Report, the NDP notes that the Irish Government is fully committed to 'playing its part' to ensure that the worst climate change damage can be avoided, e.g. significant reductions in CO_2 and other greenhouse gas emissions as assisted by the achievement of both European and National renewable energy targets. Specifically, the NDP states that,

> *"The next 10 years are critical if we are to address the climate crisis and ensure a safe and bright future for the planet, and all of us on it.*
>
> *The investment priorities included in this chapter [Ch. 13] must be delivered to meet the targets set out in the current and future Climate Action Plans, and to achieve our climate objectives. The investment priorities represent a decisive shift towards the achievement of a decarbonised society, demonstrating the Government's unequivocal commitment to securing a carbon neutral future."*

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

One of the NDP's strategic climate priorities in the need for low-carbon, resilient electricity systems; specifically, the plan commits to **increasing the share of renewable electricity up to 80% by 2030.** This is characterised by the NDP as an '*unprecedented commitment to the decarbonisation of electricity supplies*' which, is certainly ambitious and an explicit driver for the deployment of new renewable generators e.g. the Proposed Project and the safeguarding / maintenance of existing assets, it is noted that the reliability of electricity supplies will also be strengthened through investment in the electricity transmission and distribution grid. The focus of investment in regulated network infrastructure is to contribute to a long-term, sustainable and competitive energy future for Ireland.

1.6 Other Relevant Onshore Wind Energy Planning Policy Publications

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

DoEHLG Wind Energy Guidelines 2006

In June 2006, the then Department of Environment, Heritage, and Local Government (DoEHLG) published '*Wind Energy Development Guidelines for Planning Authorities'* (the Guidelines) under Section 28 of the Planning and Development Act, 2000, as amended. The aim of these guidelines was to assist the proper planning of wind power projects in appropriate locations around Ireland. The Guidelines also highlight general considerations in the assessment of all planning applications for wind energy. They set out advice to planning authorities on planning for wind energy through the development plan process

and in determining applications for planning permission. They contain guidelines to ensure consistency of approach throughout the country in the identification of suitable locations for wind energy development.

While the Guidelines remain the relevant guidelines in place, at the time of submission of the planning application, decision makers (Planning Authorities and An Coimisiún Pleanála) are not bound to their provisions and they can (and do) consider updated standards/requirements/specifications in assessing impacts and the proper planning and sustainable development of the area.

Department Circular PL5/2017

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

The Circular also set out the four key aspects of a *preferred draft approach* being developed to address the key aspects of the review of the Guidelines as follows:

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

Draft Revised Wind Energy Development Guidelines 2019

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

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

- Acceptable noise thresholds and monitoring frameworks;
- Visual amenity setback;
- Control of shadow flicker;

- Compliance with Community consultation and dividend requirements, as included within the obligatory Community Report; and
- Consideration of the siting, route and design of the proposed grid connection as part of the whole project

The design of the Proposed Project has taken account of the *"preferred draft approach"* and accordingly, has been developed with the provisions of the draft Guidelines fully considered (for example in relation to 4 times turbine tip height set back distance from third party sensitive receptors) and the inclusion of a standalone community report.

As stated above, the submission period for the draft Guidelines closed in February 2020. Under the consultation concerns were raised in relation to a number of themes these include but are not limited to noise, visual amenity, set back and shadow flicker. With regards to noise, a number of the received submissions noted that the provisions put forward in the draft Guidelines were unworkable and could impact the viability of the entire onshore wind sector. Furthermore, questions were raised surrounding the strict measures proposed for shadow flicker; the draft Guidelines put forward the provision that '*there will be no shadow flicker at any existing nearby dwelling or other relevant existing affected sensitive property' which didn't allow time for the safe shutting down of turbines*.

At time of writing the draft Guidelines are not yet finalised and have not been adopted. The relevant Wind Energy Guidelines for the purposes of section 28 of the Planning and Development Act 2000, as amended, remain those published in 2006. Notwithstanding this, however, due to the timelines associated with the planning process for renewable energy projects it is possible that an updated version of the draft Guidelines may be finalised during the consideration period for the current Proposed Project. To this end, on the basis of the details available from the draft Guidelines it is anticipated that the Proposed Project will be capable of adhering to the relevant noise and shadow flicker standards, albeit without sight of the final, adopted Guidelines. While the final Guidelines have not yet been published it should be noted that the Proposed Project maintains a four times tip height set back between turbines and identified sensitive receptors, furthermore detailed community consultations have been carried out.

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

In December 2016, the Department of Communications, Climate Action and Environment (DCCAE) issued a Code of Practice for wind energy development in relation to community engagement. The Code of Good Practice is intended to ensure that wind energy development in Ireland is undertaken in adherence with the best industry practices, and with the full engagement of local communities. Community engagement is required through the different stages of a project, from the initial scoping, feasibility and concept stages, right through construction to the operational phase. The methods of engagement should reflect the nature of the project and the potential level of impact that it could have on a community. The guidelines advise that ignoring or poorly managing community concerns can have long-term negative impacts on a community's economic, environmental or social situation. Not involving communities in the project development process has the potential to impose costly time and financial delays for projects or prevent the realisation of projects in their entirety.

1.7 Regional Policy

Southern Regional Assembly Regional Spatial & Economic Strategy

Adopted on the 31st of January 2020, the principal statutory purpose of the RSES is to support the implementation of the Project Ireland 2040 National Planning Framework ('NPF') / National Development Plan ('NDP') and the economic policies and objectives of the Government. The RSES aims to build on the region's strengths and potential to become a more prosperous, sustainable, climate resilient and attractive region for the benefit of all its people. up to 2040 and beyond.

The RSES notes that planning policy and objectives must incorporate resilience and adaptability to ensure that the Region are agile and responsive to change. At present, Irish per capita GHG emissions are among the highest in Europe and Government has identified '*Climate Change as the most important long-term challenge facing Ireland' with a stated commitment to 'the transformation required to achieve a low carbon resilient future'*. Transition to a low carbon energy future will require a wide range of policy responses across industry and public sectors, including electricity.

To achieve national and EU targets in the context of the electricity sector, the RSES notes that further investment is required to develop alternative renewable energy sources with greater interconnection to energy resources. This key enabling action is captured under **Strategic Aim 8** which sets out the need to "*safeguard and enhance the environment through sustainable development, prioritising action on climate change across the region, driving the transition to a low carbon and climate resilient society*." Both the NPF and RSES emphasise, however, that the planning process is well placed to implement and integrate climate change objectives.

- **RPO 9 (Holistic Approach to Delivering Infrastructure)**: *It is an objective to ensure investment and delivery of comprehensive infrastructure packages to meet growth targets that prioritise the delivery of compact growth and sustainable mobility as per the NPF objectives including for renewable energy and climate change adaption.*

The RSES sets out a number of Regional Policy Objectives ('RPOs') designed to facilitate greater integration of renewables into the National Grid. The RSES notes that there is significant potential to use renewable energy across the Region to achieve climate change emission reduction targets. As such, the RSES supports renewable industries such as the Proposed Project.

- **RPO 87 (Low Carbon Energy Future)**: *The RSES is committed to the implementation of the Government's policy under Ireland's Transition to a Low Carbon Energy Future 2015-30 and Climate Action Plan 2019. It is an objective to promote change across business, public and residential sectors to achieve reduced GHG emissions in accordance with current and future national targets, improve energy efficiency and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture.*

- **RPO 95 (Sustainable Renewable Energy Generation)**: *It is an objective to support implementation of the National Renewable Energy Action Plan (NREAP), and the Offshore Renewable Energy Plan and the implementation of mitigation measures outlined in their respective SEA and AA and leverage the Region as a leader and innovator in sustainable renewable energy generation.*

- **RPO 96 (Integrating Renewable Energy Sources)**: *It is an objective to support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate renewable energy sources and ensure our national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grows.*

- **RPO 99 (Renewable Wind Energy)**: *It is an objective to support the sustainable development of renewable wind energy (on shore and offshore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.*

- **RPO 100 (Indigenous Renewable Energy Production and Grid Injection)**: *It is an objective to support the integration of indigenous renewable energy production and grid injection.*