Planning and Environmental Consultants

Planning Report

Carrow Wind Farm, Co. Tipperary and Co. Limerick

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1. EXECUTIVE SUMMARY

The proposed Carrow Wind Farm will consist of 14 no. wind turbines and associated infrastructure in County Tipperary including underground cabling to connect the wind turbines to the proposed onsite 110kV substation. The 14 no. wind turbines will have an overall turbine tip height of 185 metres; rotor blade diameter of 163 metres; and hub height of 103.5 metres, and associated foundations and hard-standing areas. The Proposed Project comprises a 110kV underground cable from the Proposed Project to the existing Killonan 110kV substation to facilitate a connection to the national grid. The Carrow Wind Farm will be henceforth referred to using the following terminology, as defined in Chapter 1 of the EIAR: the 'Proposed Project', the 'Proposed Wind Farm', the 'Proposed Grid Connection Route', and the 'Site'. This application for the Proposed Project comprises of a planning application under the provisions of Section 37E of the Planning and Development Act 2000, as amended (the Act), to An Coimisiún Pleanála (the Commission).

This Planning Report has been prepared in support of the application for the Proposed Project which is accompanied by an Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS). The introductory sections of this Planning Report, provide an overview of the Proposed Project, the Proposed Project design, the applicant, the site location and context, the site's planning history and a summary of the pre-planning process. The design process is outlined, demonstrating the rationale for site selection and its suitability for wind energy development. The iterative design process outlines the design stages from the initial design to the final design iteration. Each design iteration responded to the specific constraints on the Proposed Wind Farm site, as they were identified by site surveys and detailed analysis.

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. At a national level, the Proposed Project is supported by the National Planning Framework, 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. A full appraisal of all the relevant policy and legislation is provided in Section 5 of this Planning Report.

In regard to local policy, the proposed turbines are wholly located within an area designated in the Tipperary Wind Energy Strategy 2016 (WES) as an area 'Open to Consideration'. As outlined in the WES, these areas are considered to have the potential to be appropriate for wind energy developments, subject to proper planning and sustainable development guidelines.

The development of viable sites for wind energy development 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 target and 80% RES-E target set out in the Climate Action Plan 2025 (CAP 25). If permitted, the Proposed Project will add approximately 86.8MW 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. The delivery of renewable energy development is dependent on a reliable grid infrastructure. The Proposed Grid Connection will facilitate the export of electricity from the Proposed Wind Farm to the national electricity grid, providing clean energy to households and businesses. This is supported within Limerick's County Development Plan, which directly supports electricity grid development and the 'Eirgrid Grid Development Strategy,' supporting future electricity needs.

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

2. INTRODUCTION

2.1 Introduction

This Planning Report has been prepared by MKO on behalf of Carrow Renewable Energy Ltd. (the Applicant), to accompany a planning application to the Commission for planning permission to construct a renewable energy development which will comprise 14 no. wind turbines, and associated infrastructure located in Co. Tipperary, including the provision of 110kV underground cabling from the Proposed Carrow Wind Farm development to the existing Killonan 110kV electrical substation, to facilitate the connection to the national grid. For the purpose of this Planning Report and as set out in Chapter 1 of the EIAR, the following referencing is used:

- Where the 'Proposed Project' is referred to this encompasses the entirety of the project for the purposes of this EIA in accordance with the EIA Directive. The Proposed Project is described in detail in Chapter 4 of this EIAR.
- Where the 'Proposed Wind Farm' is referred to, this refers to turbines and associated foundations and hardstanding areas, including entrances and access roads, underground cabling, permanent meteorological mast, temporary construction compounds, turbine delivery accommodation works, spoil repository areas, borrow pits, tree felling, site drainage, operational stage signage, battery energy storage system and all ancillary works and apparatus. The Proposed Wind Farm is described in detail in Chapter 4 of this EIAR.
- Where the 'Proposed Grid Connection Route' is referred to, this refers to the 110kV onsite substation, all ancillary works and underground 110kV grid connection cabling connecting to the existing Killonan 110kV substation Co. Limerick, and all ancillary works and apparatus. The Grid Connection Route is described in detail in Chapter 4 of this EIAR.
- 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 and encompasses an area of approximately 1,564 hectares. Where the 'Wind Farm site' is referred to, this relates the EIAR Site Boundary without the corridor that encompasses the underground grid connection cabling route.

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.

A planning application under Section 37E of the Act will be submitted directly to the Commission for the Proposed Project. The Proposed Project will be the subject of EIA as it meets the mandatory EIA requirement as set out in Class 3(i) of Schedule 5 of Part 2 of the Planning & Development Regulations 2001, as amended. The Proposed Project exceeds 5MWs in scale and proposes more than 5 turbines and therefore is subject to mandatory EIA. The EIAR, along with the NIS which accompany this planning application assess all elements of the Proposed Project. Both the EIAR and NIS contain the information necessary for the Commission, to complete the Environmental Impact Assessment and Appropriate Assessment as required for the planning permission application.

2.2 Report Structure and Contents

Section 1: Executive Summary – Introduces the Report.

Section 2: Introduction – Sets out the report structure and provides a summary of the Proposed Project. This section also provides an overview of RED III.

Section 3: Proposed Project Background - Provides an introduction to the applicant, the site location and context, the planning history, pre-planning consultation.

Section 4: The Proposed Project - Provides a description of the main elements of the Proposed Project, subject of this planning application.

Section 5: Proposed Project Design Process - Details the progression of the Proposed Project design from site selection through to the final design

Section 6: Planning Policy Appraisal - Provides a review and evaluation of the Proposed Project against European, national, regional, and local policy.

Section 7: Conclusion – Summarises the Report.

2.3 Rationale for the Proposed Project

Ireland's Climate Action Plan 2025 (CAP 25) sets ambitious yet essential targets for renewable energy, including 9GW of onshore wind capacity—with at least 5GW to be delivered by 2030—and an 80% share of renewable electricity by the same year. However, multiple assessments, including the Climate Change Advisory Council (CCAC) Annual Review and the Environmental Protection Agency (EPA) emissions projections, confirm that Ireland is not on track to meet these targets. Significant gaps remain in renewable energy deployment, particularly in grid capacity expansion and wind farm development, while continued reliance on fossil fuels threatens national and EU climate commitments.

In this context, the Tipperary County Development Plan 2022-2028 (TCDP) sets out an ambitious target of **target of 600MW of wind energy to be constructed and operational by 2028** in County Tipperary (Section 10.4.1, TCDP). At the time of publication, the TCDP states that 475 MW of wind energy is operational, resulting in an additional 125MW, or an approximate 25% increase, of wind energy required for the County to meet it's targets for 2028. The bringing forward of appropriately located and well-designed renewable energy projects, including the Proposed Project will be a crucial factor if this ambitious goal is to be reached.

In this regard, the Proposed Project alone would contribute 86.8MW of installed capacity to the national electricity grid, accounting for almost 70% of the total 125MW required. Its approval would make a significant contribution toward Co. Tipperary's renewable energy ambitions and help bridge the widening gap between policy commitments and actual energy infrastructure development.

Similarly, the Limerick Development Plan 2022-2028 (LDP) sets clear support for the production of renewable energy and it's connection to the national grid. The LDP recognises the potential of renewable energy resources, including wind energy, to help meet the future electricity needs of Limerick.

2.3.1 Why this Wind Farm is needed

To combat the effects of climate change, Ireland must decarbonise its economy by 2050. There is no "silver bullet" or magic solution to do so. It will take hundreds, if not thousands, of 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.

In 2020, Ireland was confirmed as a world leader in onshore wind energy, with no other country providing a greater share of its electricity from onshore wind[1], when a total of 40.23% of the country's electricity was

[1] https://www.ren21.net/wp-content/uploads/2019/05/gsr_2020_full_report_en.pdf

generated from renewable sources, the vast majority of which came from onshore wind. As a country, we only became world leaders by consenting and building one wind farm at a time. Now, with the Government's Climate Action Plans requiring the amount of onshore wind energy to increase to 9,000MW by 2030 (just four years away), hundreds of additional wind farms will have to be connected to the national grid over the rest of this decade. To reach this target, at least 5,000MW of energy needs to be delivered within the next 4 years. In the same way we only achieved our 2020 target of 40% renewable electricity target one wind farm at a time, we will only get to our new target of 9,000MW of onshore wind energy by 2030, one wind farm at a time.

The Proposed Project will contribute towards the Government's Climate Action Plan's 9,000MW target for installed onshore wind energy and target of 80% renewable electricity. The 80% renewable electricity target must be achieved by 2030. Not 2040. Not 2050. By 2030.

The global climate is breaking down as a result of greenhouse gas emissions from the burning of fossil fuels. News stories of climate change-related extreme weather events are now a constant in the daily news cycle. On the back of unprecedented extremes experience in summer 2023, UN Secretary-General, in September 2023 issued the following statement[2]:

> *"The dog days of summer are not just barking, they are biting.*
>
> *Our planet has just endured a season of simmering – the hottest summer on record.* ***Climate breakdown has begun.***
>
> *Scientists have long warned what our fossil fuel addiction will unleash.* ***Our climate is imploding faster*** *than we can cope with extreme weather events hitting every corner of the planet.*
>
> ***Surging temperatures demand a surge in action****.*
>
> *Leaders must turn up the heat now for climate solutions.*
>
> *We can still avoid the worst of climate chaos – and* ***we don't have a moment to lose****."*

The World Meteorological Organisation (WMO) report '*State of the Global Climate 2024*', published in March 2025, states that the year 2024 was the warmest year on observational record, with temperatures exceeding 1.5 degrees above pre-industrial levels[3]. On the 14th January 2026, the WMO issued a press release confirming that 2025 was one of the three warmest years on record, continuing a pattern of the last eleven years having been the eleven warmest on record[4].

"*The Status of Ireland's Climate 2020*" produced by MET Eireann[5], similarly reflects on clear and distinct impacts arising from climate change effects within an Irish context:

Greenhouse gas emissions continue to rise:

- Background carbon dioxide (CO_2) concentrations reached 414 ppm in 2020 which is approximately a 50% increase compared to pre-industrial levels.
- Methane (CH_4) concentrations are at 1940 parts per billion (ppb) - which is approximately a 170% increase compared to pre-industrial levels.
- Nitrous oxide (N_2O) concentrations are now above 330 ppb - which is approximately a 20% increase compared to pre-industrial levels.

Annual average amounts of precipitation are increasing:

[2] https://www.un.org/sg/en/content/sg/statement/2023-09-06/secretary-generals-message-the-hottest-summer-record?_gl=1*1ofxg1o*_ga*MTYwNzQ4MzU1LjE3MDE4NDg3NTI.*_ga_S5EKZKSB78*MTcwMTg4NzgwNS4xLjAuMTcwMTg4NzgwOS41Ni4wLjA.*_ga_TK9BQL5X7Z*MTcwMTg4NzQwMS4yLjEuMTcwMTg4NzgwNS4wLjAuMA..
[3] *State of the Global Climate 2024 (World Meteorological Organisation, March 2025)*
[4] *https://wmo.int/news/media-centre/wmo-confirms-2025-was-one-of-warmest-years-record*
[5] *Climate Status Report for Ireland 2020 (Environmental Protection Agency, Marine Institute, Met Éireann, August 2021)*

- Annual precipitation was 6% higher in the period 1989 to 2018, compared to the 30-year period 1961 to 1990. The decade 2006 to 2015 was the wettest on record.

Annual average air temperature is rising:

- The annual average surface air temperature in Ireland has increased by approximately 0.9°C over the last 120 years, with a rise in temperatures being observed in all seasons.
- An increase in the number of warm spell days the last 60 years with very little change in cold spell duration.

Sea level continues to rise:

- Satellite observations indicate that the sea level around Ireland has risen by approximately 2-3mm/year since the early 1990s. Analysis of sea level data from Dublin Bay suggests a rise of approximately 1.7mm/year since 1938 which is consistent with global average rates.

The ocean is becoming more acidic:

- Measurements in the surface waters to the west of Ireland between 1991 and 2013 indicate an increase in ocean acidity which threatens calcifying species such as corals, shellfish and crustaceans.

The ocean is getting warmer:

- The average sea surface temperature at Malin Head over the 10 years between 2009 and 2018 was 0.47°C above the 1981-2010 mean.

There is an increase in river flows across most of the country:

- Data analysis from the last 50 years identifies an increase in the magnitude of the river flows across most of the country
- There is evidence in more recent years of an increase in potential drought conditions especially in the east.

The area of forests and artificial surfaces has increased:

- Land cover observations since 1990 show increases in the area covered by both artificial surfaces and forests and a decrease in wetland areas which include peatlands. There was an increase of 38% in the volume of trees between 2006 and 2017.

In 2025, Met Éireann issued the *"Annual Climate Statement for 2025"* [6], providing an update on the impact that climate change is having on the Irish climate:

- 2025 was the warmest year on record in Ireland since 1900, and the second warmest year on record.
- The last 4 years (2022-2025) are now the 4 warmest years on record
- Rainfall data suggests 2025 was the 15th wettest year since 1941

There is now an overwhelming consensus amongst scientific and political leaders on the need for rapid, dramatic and systemic change to combat the effects of climate change and decarbonise the global and Irish economies through the use of renewable energy. This is highlighted in the following comments and report extracts.

[6] *Published 6th January 2026;*

"Leaders must act now to save humanity from the worst impacts of climate chaos, and profit from the extraordinary benefits of renewable energy. That means ending our fossil fuel addiction by shrinking supply, driving down demand, and accelerating the renewables revolution, as part of a just transition."
António Guterres, United Nations Secretary-General – November 2023

"Never before have the alarm bells been ringing so loudly. We must rise to this challenge. I believe we can. We cannot prevent climate change, we're well past that point, but by acting urgently now, we can limit its extent and mitigate its worst effects."
Former Taoiseach Leo Varadkar, in his address to COP 28, 2nd December 2023

Ireland is not on track to meet the 51 per cent emissions reduction target (by 2030 compared to 2018) based on these projections which include most 2023 Climate Action Plan measures. Further measures still need to be identified and implemented to achieve this goal.

The first two carbon budgets (2021-2030), which aim to support achievement of the 51 per cent emissions reduction goal, are projected to be exceeded by a significant margin of between 24 and 34 per cent.

Sectoral emissions ceilings for 2025 and 2030 are projected to be exceeded in almost all cases, including Agriculture, Electricity, Industry, and Transport.
Ireland's Greenhouse Gas Emissions Projections. Environmental Protection Agency – June 2023[7]

"We need faster progress on the actions set out in national climate action plans to decarbonise and transform all sectors of Ireland's economy, to stay within National Carbon Budgets and reduce our Greenhouse Gas emissions by 51 per cent by 2030."
Laura Burke, Director General, EPA, launching the Greenhouse Gas Emission Inventory 1990-2022 Report[8]

Ireland will not meet the targets set in the first and second carbon budget periods unless urgent action is taken immediately and emissions begin to fall much more rapidly.
Climate Change Advisory Council – Annual Review 2023[9]

The world is on a disastrous trajectory. Crossing one harmful tipping point could trigger others, causing a domino effect of accelerating and unmanageable change to our life-support systems.
The Global Tipping Points Report 2023. University of Exeter, Exeter, UK[10].

Every wind farm project counts. Carrow Wind Farm will count.

2.4 Legal Obligations of Public Bodies

Public Bodies (including Local Authorities such as the Commission) will be aware of certain legal obligations in respect of the processing of certain planning applications and appeals for renewable wind energy developments, in particular:

- Certain obligations under the Climate Action and Low Carbon Development Act 2015 (as amended) (the "Climate Act") imposed on Public Bodies when exercising their decision-making functions in relation to planning applications for renewable wind energy developments.

[7] https://www.epa.ie/publications/monitoring-assessment/climate-change/air-emissions/irelands-greenhouse-gas-emissions-projections-2022-2040.php
[8] https://www.epa.ie/news-releases/news-releases-2023/irelands-2022-greenhouse-gas-emissions-show-a-welcome-decrease-but-much-work-remains-to-be-done.php
[9] https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR-2023-FINAL%20Compressed%20web.pdf
[10] https://global-tipping-points.org/download/4608/

- Certain discretionary powers under the Planning and Development Act 2000 (as amended) (the "Planning Act") which must be exercised subject to the mandatory obligations set out in the Climate Act when Public Bodies are exercising their decision-making functions in relation to planning applications for renewable wind energy developments.

Obligations under the Climate Act and the Planning Act

When exercising its decision-making powers under the Planning Act, Public Bodies are obliged to perform their decision-making function (in so far as practicable) 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.**

Specifically, Section 15(1) of the Climate Act provides that:

"A relevant body shall, in so far as practicable, perform its functions in a manner consistent with—

- ***the most recent approved climate action plan,***
- ***the most recent approved national long term climate action strategy,***
- ***the most recent approved national adaptation framework and approved sectoral adaptation plans,***
- ***the furtherance of the national climate objective, and***
- ***the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State." (the "National Climate Policies and Objectives")***

The above requirement is a **mandatory** obligation.

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 the Commission 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'*. This means that departure from climate objectives is permissible but only where there are genuine practical difficulties that make full alignment impracticable.

Consenting Authorities, in making a decision on application of this nature, must meaningfully engage with national climate objectives when exercising their decision-making functions. Consenting Authorities, must also ensure that their decision on an application falls within a spectrum of outcomes which can be considered to be 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 local development plan, particularly when the local development plan is out of step with national policy.

At present, there are no mandatory legal requirements that prevent the Commission from reaching an outcome, in relation to the Proposed Project, that favours policy goals. 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 evaluative judgement in a manner that delivers an outcome favouring the Proposed Project, which directly contributes to the achievement of national and EU policy goals, in accordance with its statutory duty under Section 15 of the Climate Act.

The Importance of Approving Well-Planned Renewable Energy Projects

The timely approval of well-planned, appropriately located renewable energy projects, such as the Proposed Project is essential to Ireland's ability to meet CAP 25 targets and also its legal commitments under national and EU law. CAP 25, the CCAC Annual Reviews for 2023 and 2024, and Ireland's Updated National Energy and Climate Plan (published in July 2024) all highlight the central role of renewable energy targets in addressing climate change.

Reports from the CCAC and the EPA 2024 and 2025 emissions projections indicate that the electricity sector is not on track to meet these targets. Accelerated deployment of onshore wind is essential if Ireland is to reach the CAP 25 goal of 9GW of onshore wind capacity—of which at least 5GW must be delivered by 2030—and an 80% share of renewable electricity by the same year.

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

Beyond environmental and energy security concerns, the economic consequences of such projects not being brought forward are severe. Investors require certainty before committing to renewable infrastructure projects. Prolonged planning delays create uncertainty, discouraging investment and undermining job creation and regional economic growth. Given the direct link between wind energy expansion and Ireland's economic resilience, energy independence, and compliance with EU climate mandates, rejecting projects that align with national policies represents a failure to uphold this statutory duty.

Every viable renewable energy project plays a crucial role in meeting Ireland's climate targets. The approval of well-planned, appropriately located renewable energy projects, such as the Proposed Project is not just beneficial, it is imperative. Without decisive action to facilitate renewable energy deployment, Ireland risks missing national and EU commitments, incurring financial penalties, and undermining energy security.

2.5 RED III

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.

Article 16(2) of REDIII provides that for applications for development outside renewable acceleration areas, the competent authority shall acknowledge the completeness of the application within 45 days. In this regard, the planning application for the Proposed Project has been prepared in line with RED III and, specifically, the Schedule of Information to Inform the Completeness Check, provided by the Commission as Appendix 2 of their SID determination under ABP-320843-24. A full assessment of the Proposed Project in relation to this schedule has been included as an appendix to the cover letter included as part of the planning application.

3. PROPOSED PROJECT BACKGROUND

3.1 The Applicant

The Applicant for the Proposed Project, Carrow Renewable Energy Ltd., are a subsidiary of Atlantic Infrastructure Renewables (AIR) which is an Irish owned, Limerick-based company which was established in 2020 with the aim to invest in infrastructure projects across Ireland to help deliver high-quality infrastructure assets that are essential to society and the communities where they are located. AIR helps bridge funding, capacity and delivery gaps and provides critical infrastructure ahead of when others might have been able to so. High quality infrastructure serves societies in terms of contributing to economic growth, local jobs and strong and vibrant communities. AIR brings those advantages forward ahead of time, and ahead of when they would otherwise be available to those communities.

AIR focuses on early-stage project investments, adding value to identified opportunities by bringing projects through the consenting processes that must be navigated to clear the first critical hurdle to delivering infrastructure and get projects shovel-ready. AIR is currently working on a portfolio of wind energy, solar energy and telecoms infrastructure projects across the country. Their wind energy project pipeline currently consists of seven projects amounting to more than 270MW, which will contribute to delivering the extra 4,000MW of wind energy required by the Government's Climate Action Plan by 2030, aimed at decarbonising the Irish economy and tackling climate change.

3.2 Site Location and Context

The Proposed Wind Farm is located approximately 2.4km south of the village of Hollyford and 4.7km north of the village of Dundrum, Co. Tipperary. It is proposed to access the Proposed Wind Farm site during both the construction and operational phase via a site entrance off the L1154 local road along the southwestern boundary of the Proposed Wind Farm site in the townland of Moheragh. The proposed entrance will included temporary accommodation works in order to facilitate the delivery of turbine components and other abnormal loads. The Proposed Wind Farm is served by a number of existing public, forestry and agricultural roads and tracks. A site location context map and the red line planning application boundary is shown as **Figure 1**. The townlands within the planning application red line boundary are listed below in **Table 3-1**.

The Proposed Grid Connection Route includes for underground 110kV grid connection cabling from the proposed onsite 110kV substation, in the townland of Moheragh, Co. Tipperary to the existing Killonan 110kV substation in the townland of Milltown, Co. Limerick. The Proposed Grid Connection Route to Milltown, Co. Limerick measuring approximately 37km in length, is primarily located within the public road corridor. Approximately 3.2km is proposed within National Roads, 15.5km proposed within Regional Roads, 16.2km proposed within Local Roads, 870 meters proposed within the Proposed Wind Farm internal road network and approximately 1.1km proposed within agricultural lands in Brittas, Cloghnadromin and Kishyquirk, Co. Limerick.

Current land-use on the Proposed Wind Farm comprises commercial forestry, agricultural pastural land, mixed forest and transitional woodland-shrub. Current land-use along the Proposed Grid Connection Route comprises of public road corridor, public open space, agriculture, commercial forestry, land principally used by agriculture with significant areas of natural vegetation, mineral extraction sites, mixed forest and discontinuous urban fabric. Land-use in the wider landscape of the Site comprises a mix of agriculture, quarrying, renewable energy, low density residential and commercial forestry. Land-use in the areas proposed for turbine delivery route accommodation comprises a mix of agriculture, transitional woodland-shrub, coniferous forest.

County Clare

County Tipperary

County Limerick

Limerick City

Cappamore

Doon

Hollyford

Cappagh White

Dundrum

Cashel

Tipperary Town

Map Legend

Planning Application Boundary

County Boundary

N

Drawing Title: Site Location

Project Title: Carrow Wind Farm

Drawn By	Checked By
ER	EM
Project No.	Drawing No.
231102	Figure 1
Scale	Date
1:130,000	2026-03-10

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Table 3-1: Townlands within the Proposed planning application red line boundary

Development Works	Townlands in Co. Tipperary	Townlands in Co. Limerick
Proposed Wind Farm		
Wind Turbines, Access Roads, Temporary Construction Compounds, Permanent Meteorological Mast, Underground Cabling, Battery Energy Storage System, Spoil Management, Tree Felling, Site Drainage, Operational Stage Site Signage and accommodation works to facilitate the delivery of large turbine components and other abnormally sized loads.	Carrow, Moheragh, Carrowkeale, Glenpaudeen, Camus, Ballynahinch, Kilshenane, Dundrum, Gortarush Lower, Scarrough	N/A
Proposed Grid Connection		
Onsite 110kV Substation and Battery Energy Storage System	Moheragh	N/A
Underground 110kV Cabling Route connecting to the existing Killonan 110kV substation	Moheragh, Scarrough, Ballybrack, Ballysheeda, Shanaknock, Rahyvira, Newtown North, Glassdrum, Greenfield, Cappagh, Philipston, Knockane, Kilbeg, Moher East, Shanacloon, Toem, Moher West, Cahernahallia, Gortaderry	Toomaline Lower, Toomaline Upper, Doon South, Lisgaugh, Cooga Upper, Kilmoylan Lower, Cooga Lower, Darkisland, Ballycoshown, Gortavalla North, Knocknacarriga, Gortnascarry, Cappamore, Portnard, Turagh, Dromsallagh, Dromcluher, Eyon, Brittas, Gorteennaskagh, Killinure, Bohergar, Sandylane, Boher, Lismullane, Cloghnadromin, , Kishyquirk, Clooncunna South, Ahabeg, Clooncunna North, Cunnihee, Whitehall, Killonan, Coolyhenan, Milltown

3.3 Planning History

A planning search was carried out through Tipperary County Council's (TCC) and Limerick City and County Council's (LCCC) online planning portal along with the Commission's online case search function in March 2026 for planning applications within the planning application red line boundary within the past 10 years. The relevant planning applications are outlined in Section 2.6.1 of Chapter 2 of the EIAR and in **Table 3-2** below.

Table 3-2: List of planning applications within the planning application boundary

Planning Ref.	Description	Decision
2460383	the construction of (i) a commercial storage shed (ii) a commercial storage yard and all associated site works	Granted by TCC on 23/12/2024
16600919	construction of a forestry entrance and associated site development works to service my lands	Granted by TCC on 13/01/2017
20660	the following development: construction of storage shed, construction of agricultural entrance and associated works	Granted by TCC 20/09/2020
19601477	slatted shed with loose straw area and calf creep, dungstead and associated concrete works	Granted by TCC on 16/09/2020
211615	construction of an entrance off existing private passageway, dwelling house, domestic waste water treatment system & polishing filter together with all associated site works	Granted by TCC on 09/02/2022
19601450	An existing extension to dwelling 2. A domestic garage/storage shed and associated site works.	Granted by TCC 26/03/2020
18600122	The indefinite retention of (a) two storey extension to the side, and single storey extensions to the front and rear of dwelling (b) garage attached to dwelling (c) new site entrance to dwelling with associated yard area (d) single storey detached domestic garden shed with site access road, and permission to complete same and planning permission to close existing entrance to dwelling	Granted by TCC 31/05/2018
201216	Demolition of an existing dwelling, demolition of a single bay barn & construction of a new 2 storey dwelling, garage, waste water treatment system, polishing filter, entrance and all associated site works.	Granted by TCC on 18/02/2021
17600624	Making alterations and construct new extension to dwelling house, including all associated site works as may be required	Granted by TCC on 24/07/2024
2260036	The following works: (a) construction of a new single-storey detached dwelling; (b) new detached garage; (c) new site entrance; (d)	Granted by TCC 22/03/2022

	new connections to existing utilities; (e) new waste-water treatment system & percolation area; (f) all associated site works	
18600687	Construction of a single storey extension to the side of original dwelling house and construction of a detached garage, and all associated site and ancillary works	Granted by TCC on 23/07/2018
211615	Construction of an entrance off existing private passageway, dwelling house, domestic waste water treatment treatment system & polishing filter together with all associated site works	Granted by TCC on 06/01/2022
21648	Erection of a single storey bungalow type dwelling, domestic garage, effluent treatment tank and a percolation system, entrance and all associated ancillary works.	Granted by TCC on 02/07/2021
211790	erect a bungalow, domestic garage, effluent treatment tank and percolation system, entrance and all associated ancillary works	Granted by TCC on 26/04/2022
19600819	construction of entrance, dwelling house, domestic garage, septic tank, percolation area and all associated site works	Granted by TCC on 01/02/2020
2560321	An extension to the front and side of the existing dwelling and all associated site works.	Granted by TCCC on 06/06/2025
176001013	Dwelling extension to the rear of existing dwelling and associated site works	Granted by TCC on 04/03/2017
2460939	A garden machinery stire, (ii) and an internal solid-fuel/domestic store, with external, covered solid-fuel storage porch, (iii) with all associated site works	Granted by TCC on 02/01/2025
17600484	a new dwelling (to replace existing dwelling to be demolished), garage, septic tank, percolation area, entrance and all associated works	Granted by TCC on 26/07/2017
18600782	change of house design to that previously granted under Ref No 17600484	Granted by TCC on 12/09/2018
19600658	Change of house design to thar previous granted under reference 17600484 and 18600782	Granted by TCC on 30/07/2019
211346	1.a dwelling house with an attached domestic storage shed. 2. the site boundaries as they exist on the ground. 3. a combined	Granted by TCC on 05/12/2021

	residential and agricultural entrance and including all associated site works, which have been constructed contrary to original planning reference number 04/1451	
16600701	Ten-year planning permission to develop an electricity service, entailing of the laying of a 20kV underground cable from the proposed Inchivara Wind Farm to proposed 38V substation at Graniera and a 38kV underground cable from the proposed 38kV substation at Graniera to the existing Cauteen 110kV/38kV substation at Seskin, Co Tipperary. The proposed development will consist of three phase underground electrical cables laid in ducts, with communications cable, draw pits, jointing bays, cable sheath sectionalising chambers, works to terminus substations and all associated works.	Granted by TCC on 21/09/2016
16600504	(I) Retain the domestic garage and (ii) construct an extension to the rear of my dwelling	Granted by TCC on 29/08/2016
2360007	The as built constructed garage for domestic use at rear of existing dwelling house together with all associated site works	Granted by TCC on 05/05/2023
18600006	The construction of an entrance, dwelling house, domestic garage, domestic wastewater treatment system and polishing filter and all associated site works	Granted by TCC on 27/02/2018
2360531	the construction of a new dwelling, entrance, wastewater treatment system, polishing filter with all associated site works	Granted by TCC on 10/10/2023
18601279	to construct a dwelling, entrance, septic tank/percolation area and all associated works	Granted by TCC on 11/07/2019
17600230	carrying out renovations and to construct single storey extensions to existing dwelling, demolish existing outhouse, install new wastewater treatment system and percolation area and carry out modifications to existing vehicular entrance to the site	Granted by TCC on 04/08/2017
21542	A new dwelling house, new entrance, new access roadway, effluent treatment system and percolation area, all associated site works and boundary alterations on the applicant's site, and on adjacent lands as may be required.	Granted by TCC on 14/10/2021

211208	The construction of a dwelling house, wastewater treatment system and percolation area, entrance and all ancillary site works.	Granted by TCC on 07/12/2021
2660227	construction of a cattle underpass with effluent storage tank and all ancillary site works	Decision due by LCCC on 26/04/2026
21477	the construction of an entrance off existing private passageway, dwelling house, septic tank & percolation area together with all associated site works	Granted by LCCC on 03/12/2021
17280	Milking parlour dairy plant room, loose house, slatted tank, slatted agricultural shed and all associated site works	Granted by LCCC on 28/06/2017
2460197	The construction of a domestic garage/store and all associated site works. The development is within the curtilage of a protected structure (RPS No. 1061)	Granted by LCCC on 26/08/2024
171204	The change of use of an existing commercial premises from a former printing business to the manufacturing and retailing of patio slabs, garden figurines, garden furniture and retailing of general goods such as sand & gravel, solif-fuel supplies, pet/animal feeds and all associated ancillary works	Granted by LCCC on 05/07/2018
24177	alterations to the existing site which include the provision of motorhome, construction of masonry boundary wall along the rear site boundary, and all ancillary site services	Granted by LCCC on 25/06/2024
21845	an extension to existing dwelling comprising part single, part two storey construction, demolition of existing shed, wastewater treatment system, percolation area and all ancillary site works	Granted by LCCC on 10/08/2021
2360865	the development will consist of the removal of 3 no. prefabricated buildings, demolition of single storey front classroom block, construction of a new two storey extension to the front and side of the existing school buildings and a new parking and set down arrangement at the main entrance and at the opposite side of the public road. The development will include special needs accommodation comprising 2 no. base classrooms, ancillary activity spaces, staff offices and toilets at ground floor level and 3 no. mainstream classrooms with associated	Granted by LCCC on 26/01/2024

	toilets, staff offices and ancillary training rooms at first floor level. New staff and visitor car park providing 22 standard car parking spaces and 1 universal car park space, providing a total 23 car parking spaces. A set-down parking bay is to be provided for student drop off. New footways to the school frontage and the far side car park and drop off bay will be provided for pedestrians, including a new uncontrolled crossing point on the local roadway	
2460003	the construction of a single storey extension to the existing detached dwelling, part conversion of the existing dwelling into a garage, demolition of the existing outbuildings, closing the existing entrance and creation of a new entrance at the north-eastern corner of the site, provision of a new onsite wastewater treatment system, connection to necessary services together with all associated incidental and ancillary works	Granted by LCCC on 27/03/2024
19829	a single storey extension to the rear of an existing dwelling, as well as elevational changes and all associated site works	Granted by LCCC on 05/11/2019
20626	the construction of a new field entrance and all associated site works	Granted by LCCC on 07/10/2020
20625	the construction of a new dwelling, garage, septic tank, percolation area, entrance and all associated site works	Granted by LCCC on 08/01/2021
19513	existing machine shed and Planning Permission for proposed slatted shed with underground tank including all ancillary site works	Granted by LCCC on 20/08/2019
2360416	the carry out of alterations and demolitions and the construction of an extension to existing dwelling including all associated site development works	Granted by LCCC on 07/09/2023
22716	a commercial workshop with concrete aprons and also for permission to carry out alterations to an existing site entrance	Granted by LCCC on 19/01/2023
21233	construction of a front porch and a sunroom to existing dwelling, change style of windows to right side elevation and retention permission is also being sought for the changes to the front elevation, for the	Granted by LCCC on 04/08/2021

	relocation of a ground floor window and front door	
221271	the demolition of the substandard dwelling house, the construction of a replacement dwelling house, domestic garage, domestic wastewater treatment system with polishing filter together with all associated site works	Granted by LCCC on 06/03/2024
18951	an existing sunroom which is attached to the Western side of the dwelling house, and for an existing storage shed which is attached to the Eastern side of the dwelling house, and all ancillary site works, permission for upgrade of private wastewater treatment system	Granted by LCCC on 21/03/2019
25367	a porch to the front of the house, a conservatory to the side of the house, a kitchen/living room extension to the rear of the house, a converted garage to living accommodation attached to the house and also retention of domestic sheds	Granted by LCCC on 18/02/2026
191250	minor modifications to a previously permitted development (Ref. 12/1002). The proposed development comprises the extension of the existing Killonan 220/110 kV Electrical Substation compound by approx. 0.5ha along and adjacent to its existing western boundary. This will facilitate the proposed siting of a previously permitted Line Cable Interface Mast (LCIM) development includes the associated erection of 2.6m high palisade fencing along the extended western boundary of the substation compound and all associated and ancillary development at the existing Killonan 220/110 kV Electrical Substation	Granted by LCCC on 24/03/2020
300283	The change of use of the ground floor of an existing building from retail to a fast food take away including new signage to front elevation. Also for retention to new windows, door and new roof to same. Also for retention of demolition of buildings to rear of same and retention of new extension to rear as built and all associated site works	Granted by ACP on 29/05/2018
304235	Retention of a completed garage, entrance and garage partially constructed and Planning Permission to complete garage partially constructed and all associated site works	Granted by ACP on 29/07/2019

The planning history search also identified wind energy development applications within 25km of the proposed turbines. 23 no. applications relating to wind energy were found, further detail on the wind energy developments identified is outlined in Section 2.6.2 of Chapter 2 of the EIAR.

3.4 Pre-Application and Engagement

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 TCC, LCCC and the Commission, and extensive consultation with the local community.

3.4.1 EIAR Scoping

As part of the constraints mapping process, which is detailed in Chapter 2, Section 2.7.1 of this EIAR, telecommunications operators, were contacted in April 2023 in order to determine the presence of telecommunications links or aviation assets traversing or located in close proximity to the Proposed Wind Farm site. Following this exercise an EIAR scoping document, providing details of the Proposed Project, was prepared by MKO and circulated in March 2024. The scoping document was circulated again in October 2024, to update the relevant bodies on the revised turbine layout, with an increase from 8 no. turbines to 14 no. turbines. 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 this assessment process and in the preparation of the EIAR.

Copies of all scoping responses received are included in Appendix 2-1 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.

3.4.2 Pre-Planning Meetings

3.4.2.1 Tipperary County Council

First Meeting

Members of the project team and the Applicant met with representatives from TCC in accordance with Section 247 of the Act via Microsoft (MS) Teams in May 2024. The purpose of this meeting was to discuss the Community Engagement and provide a high-level introduction to the Proposed Project. Those in attendance were:

On behalf of Tipperary County Council:

- Lauren Butler-Ryan, Area Planner
- Caroline Conway, Assistant Engineer
- James Sword, Senior Engineer

On behalf of Agent and Applicant:

- Alan Clancy, MKO
- Jonny Fearon, MKO
- Eoin McCarthy, MKO
- Jade Power, MKO
- John Tierney, Carrow Renewable Energy Limited

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

- The planning and environmental constraints of the Proposed Project.
- The Proposed Wind Farm layout.
- The 2 no. options for the grid connection route.
- An outline of the community consultation efforts that had taken place to date.

Following on from the presentation discussions centred around the following matters:

- The options for the grid connection routes.
- The cumulative assessment of the Proposed Project.
- The turbine delivery route.
- The SID status of the Proposed Project.

AIR held a further meeting with members of the Roads Department at Tipperary County Council in November 2024 to further discuss the Proposed Grid Connection.

Second Meeting

A second meeting was held between Tipperary County Council and Members of the Project Team, on the 27th January 2026. The purpose of this meeting was to address specific concerns, which had been raised in discussion with the Commission.

On behalf of Tipperary County Council:

- Lauren Butler – District Planner
- James Swords – Senior Engineer
- Tim Kilmartin – Executive Engineer
- Caroline Conway – Senior Executive Planner

On behalf of the Agent and Applicant:

- Colm Ryan – Planning Director
- Eoin McCarthy – Project Manager Environmental Science
- Alan Clancy – Senior Planner
- Edward Ryan – Environmental Scientist
- Ciara Griffin – Planning Practitioner
- Joye Atkinson – Environmental Scientist

The main themes of discussion included:

- Proposed Cumulative Impact Assessment
- Grid Connection and Impact on Public Road Network
- Watercourse Crossings
- TDR and Grid Connection Route

3.4.2.2 Limerick City and County Council

Members of the project team met with Limerick City and County Council in February 2025. Those in attendance were:

On behalf of Limerick City and County Council:

- Seamus O'Reilly, Engineer

- Jennifer Collins, Planner
- John Gannon, Roads Engineer

On behalf of Agent and Applicant:

- Alan Clancy, MKO
- Jonny Fearon, MKO
- Eoin McCarthy, MKO
- Ciara Griffin, MKO
- Neil O'Brien, Carrow Renewable Energy Limited
- John Tierney, Carrow Renewable Energy Limited

The purpose of this meeting was to discuss the Proposed Grid Connection and provide a high-level introduction to the Proposed Project, specifically the Proposed Grid Connection, in the form of a PowerPoint presentation which set out the following information:

- A high-level overview of the Proposed Wind Farm
- Policy context supporting the development of grid infrastructure.
- The 2 no. options for the grid connection route.
- Locations in Co. Limerick which the Proposed Grid Connection will traverse.

Following on from the presentation discussions centred around the following matters:

- Details of the Proposed Grid Connection options including interconnectors and jointing bays.
- The impact of the Proposed Grid Connection on future maintenance works on the roads.
- Site investigations to be undertaken for the Proposed Grid Connection.

3.4.2.3 An Coimisiún Pleanála (Section 37B)

The Applicant engaged with the Commission under the provisions of Section 37B of the Planning and Development Act 2000 (as amended), as to whether the Proposed Project would meet the thresholds of the Seventh Schedule of the Planning and Development Act, 2000, as amended. The applicant opened consultations with the Commission in September 2024 in relation to a Proposed Project. A total of 2 meeting were undertaken with the Commission which are detailed below.

First Pre-Application Meeting

The first meeting was held with the Commission was held on 23rd October 2024 via Microsoft Teams in accordance with Section 37B of the Act. Those in attendance were:

On behalf of the Commission:

- Stephen Kay, Planning
- Lauren Murphy, Executive Officer
- Máire Daly, Planning
- Ellen Matthews, Executive Officer
- Sue Morel, Executive Officer

On behalf of Agent and Applicant:

- Alan Clancy, MKO
- Jonny Fearon, MKO
- Eoin McCarthy, MKO
- Ciara Griffin, MKO
- Neil O'Brien, Carrow Renewable Energy Limited

- John Tierney, Carrow Renewable Energy Limited

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

- A high-level overview of the Proposed Project and the subject site.
- An introduction to the Applicant.
- An overview of the Proposed Wind Farm and the Proposed Grid Connection.
- An overview of the constraints assessment leading to the site layout.
- Provided details of the proposed Turbine Delivery route.
- Provided a brief overview of the landscape and visual impact assessment.
- An outline of the community consultation efforts that had taken place to date.

Following on from the presentation, discussion included the following matters:

- The 2 no. options for the grid connection route.
- The visual impact of the Proposed Wind Farm and the siting of the turbines in the layout.
- The cumulative impact of the Proposed Project.
- Peat stability and drainage at the Site.

Second Pre-Application Meeting

A second meeting was held with the Commission on 8th of January 2026 via Microsoft Teams in accordance with Section 37B of the Act. Those in attendance were:

On behalf of the Commission

- Fiona Patterson, Ecology/Environment
- Finbarr Quigley, Environment
- Heidi Thorsdalen, Planning
- Stephen Kay, Planning
- Sinéad O'Connor, Planning
- Paula Kearney, Ecology
- Lauren Murphy, Executive Officer

On behalf of Agent and Applicant:

- Alan Clancy, MKO
- Edward Ryan, MKO
- Evan Connolly, MKO
- Eoin McCarthy, MKO
- Ciara Griffin, MKO
- Neil O'Brien, Carrow Renewable Energy Limited
- John Tierney, Carrow Renewable Energy Limited

The project team gave an overview of the Proposed Project in the form of a PowerPoint presentation which provided updates on the Proposed Project and discussed matters relating to the Renewable Energy Directive (RED) III. The presentation set out the following information:

- A high-level overview of the Proposed Project and the subject site.
- An overview of the Proposed Wind Farm and the Proposed Grid Connection.
- An overview of Strategic Infrastructure Development Criteria.
- A high-level overview of RED III and the planning policy context for the Proposed Project.
- An introduction to the contents of the EIAR and NIS which will accompany the planning application.
- An outline of a sample completeness check in line with RED III.

- Community consultation and scoping which has taken place to date.
- An overview of the Proposed Project Timeline.

Following on from the presentation, discussion included the following matters:

- The Battery Energy Storage System (BESS) element of the Proposed Project.
- Engagement with statutory bodies to date including the National Parks and Wildlife Service (NPWS), Transport Infrastructure Ireland (TII) and Irish Rail.
- The proposed Turbine Delivery Route (TDR).
- The design and layout of the Proposed Wind Farm site in relation to the public road.
- Proposed water course crossings within the Proposed Wind Farm site and along the Proposed Grid Connection Route.
- Assessment of alternative grid connection routes.
- The cumulative impact assessment of the Proposed Project from an ecological perspective.
- The landscape and visual impact assessment of the Proposed Project.
- The public consultation that has taken place and the upcoming Public Information Event.

On the 10th of February 2026, MKO, on behalf of the Applicant, sought to close the consultation process with the Commission. On the 23rd March 2026, the Commission wrote to the applicant and confirmed that consultation was closed and that the Proposed Project was considered to be strategic infrastructure within the meaning of Section 37A and such any application for approval of the Proposed Project should be made directly to the Commission. A copy of the SID determination letter is included at Appendix 2-2 of the EIAR.

3.4.3 Community Consultation

The Applicant has undertaken extensive consultation with the local community. A Community Liaison Officer was 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 Engagement Report has been prepared to accompany the planning application and is included at Appendix 2-3 of the EIAR. In summary, the Community Engagement 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.

In August 2025, door to door consultation took place amounting, with 103 homes being visited within 1.5km radius of the Proposed Wind Farm. Residents were given a brochure with information on the project, such as the location of the development study area, the estimated project timeline and contact details, as well as a feedback questionnaire.

A dedicated project website (https://carrowwindfarm.com) was designed and went live in August 2025 on the same day as the Door-to Door Engagement was carried out. The website was updated with the latest information over the following months as the project plans took shape. The website contained an FAQ section answering the most frequently asked questions about the Proposed Project.

On 21st of January 2026 a Public Information Event was held at Annacarty Hall, Annacarty, Co. Tipperary. The objective of the consultation was to ensure that the views and concerns of all were

considered as part of the Proposed Project Design and EIA process. The PIE was staged in a format designed to be open and interactive for the attendees. Boards were erected on either side of the hall displaying posters with information about the development and maps of the proposed site layout. Maps were also displayed showing the turbine delivery and grid connection routes, and aerial imaging of the site with the locations of the turbines clearly marked.

AIR has engaged and consulted with the local community from an early stage of the pre-planning phase of the Carrow Wind Farm development. This process of community engagement has proven highly valuable as a means of identifying the key concerns of the local community in relation to the Proposed Project, and the issues raised by local residents during the consultation process have informed and shaped the project proposal.

The development of the Carrow Wind Farm will provide a direct and prolonged economic benefit to the communities surrounding the Proposed Project site through the Community Benefit Fund, and through employment opportunities during the construction process. The developers are committed to maintaining the strong community engagement approach throughout the post-application stage and, if planning permission is granted, will continue to consult with and be available to residents through the construction and operational lifespan of the Carrow Wind Farm.

4. THE PROPOSED PROJECT

The Proposed Project will encompass 14 no. wind turbines with a blad tip heigh t of 185 metres (m) and all associated foundations and hardstanding areas, access roads and entrances including upgrade of existing site roads and provision of new roads, 110kV electrical substation and wind farm control buildings, battery energy storage system, underground cabling, borrow pits, electrical cabling for 110kV grid connection, biodiversity enhancement areas, temporary construction compounds, a permanent meteorological mast and temporary accommodation areas along the turbine delivery route. A full description of the Proposed Project is available in Chapter 4 of this EIAR.

The Proposed Project will be connected to the national grid via an underground 110kV electrical cable from the proposed 110kV onsite electricity substation to the existing Killonan 110kV Substation in the townland of Milltown, Co. Limerick, located approximately 37km west of the Proposed Wind Farm site.

The full description of the Proposed Project is detailed in Chapter 4 of this EIAR.

The Proposed Project as set out in the public notices is as follows:

The proposed development will consist of the provision of the following:

i. *The construction of 14 no. wind turbines with an overall turbine tip height of 185 metres; a rotor blade diameter of 163 metres; and hub height of 103.5 metres, and associated foundations and hard standing areas;*
ii. *A permanent 110kV substation compound (2 no. control buildings with welfare facilities, all associated electrical plant and equipment, security fencing, entrance on to existing track, all associated underground cabling, wastewater holding tank, site drainage and all ancillary works;*
iii. *Underground internal wind farm electrical cabling and communications cabling connecting the wind turbines to the proposed on-site 110kV electrical substation and associated ancillary works;*
iv. *A meteorological mast of 103.5m in height, and associated foundation and hard-standing area;*
v. *All works associated with the upgrade of the existing agricultural access off the L1154 local road (including the installation of fencing and steel gates) to serve as the main site entrance for the wind farm;*
vi. *The provision of 4 no. new access/egress points along the L1154;*
vii. *The provision of 4 no. new access/egress points along the L-5117;*
viii. *The provision of 5 no. new access/egress point along the L-5206;*
ix. *The provision of 2 no. new access/egress points along the L-52061;*
x. *Upgrade of existing tracks/ roads and junctions and provision of new site access roads and junctions;*
xi. *3 no. temporary construction compounds with temporary offices and staff welfare facilities;*
xii. *Accommodation works along the public road network in the townlands of Camus, Ballynahinch, Kilshenane, Dundrum, Gortarush Lower, Carrow, Scarrough, and Moheragh, Co. Tipperary to facilitate the delivery of turbine components and other abnormal loads;*
xiii. *2 no. Borrow Pits;*
xiv. *Spoil Management;*
xv. *Site Drainage;*
xvi. *Tree Felling and hedgerow removal;*
xvii. *Biodiversity Management and Enhancement Measures;*
xviii. *Operational stage site signage;*
xix. *Battery Energy Storage System and all associated electrical plant and equipment, security fencing, 2 no. static water storage tanks and a firewater retention tank, and all associated infrastructure and apparatus;*

xx. *The provision of underground electrical (110kV) and communications cabling from the proposed on-site 110kV electrical substation to the existing Killonan 110kV electrical substation to facilitate the connection to the national grid (RPS S018);*

xxi. *Provision of 58 no. joint bays, communication chambers and earth sheath links along the proposed underground electrical cabling route;*

xxii. *Reinstatement of land, road and track surface above the proposed cabling trench; and*

xxiii. *All related site works and ancillary development considered necessary to facilitate the proposed development, including landscaping and the reinstatement of land.*

Figure 2 below shows the Proposed Project layout, **Figure 3** shows the Proposed Wind Farm site layout, and **Figure 4** shows the Proposed Grid Connection layout.

County Clare

County Tipperary

County Limerick

Limerick City

Cappamore

Doon

Cappagh White

Hollyford

Dundrum

Cashel

Tipperary Town

T1
T2
T3
T4
T5
T6
T7
T8
T9
T10
T11
T12
T13
T14

Map Legend

- Planning Application Boundary
- Proposed Turbine Locations
- Proposed Met Mast
- Turbine Hardstands
- Existing Roads to be Maintained
- Existing Roads to be Upgraded
- Proposed New Roads
- Proposed Borrow Pits
- Proposed Spoil Repository Areas
- Temporary Construction Compound
- Proposed Riparian Buffer
- Proposed Wet Grassland Management
- Proposed Woodland Management
- Proposed 110kV Substation
- Existing Killonan 110kV Substation
- Proposed 110kV Underground Grid Connection Route
- Turbine Delivery Route
- County Boundary

Drawing Title: Proposed Project Layout

Project Title: Carrow Wind Farm

Drawn By	Checked By
ER	ER
Project No.	Drawing No.
231102	Figure 2
Scale	Date
1:130,000	2026-03-09

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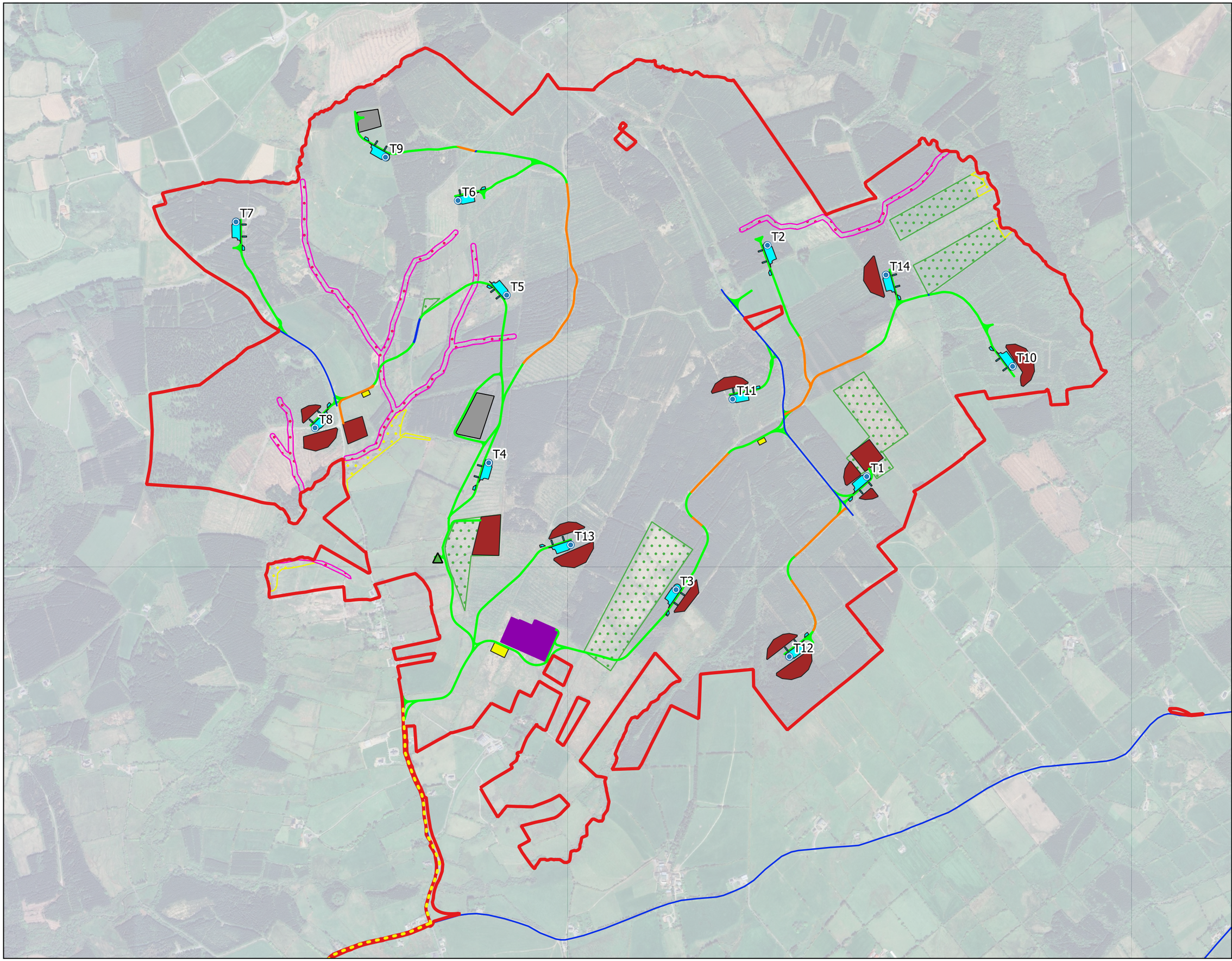

Map Legend

- Planning Application Boundary
- Proposed Turbine Locations
- Proposed Met Mast
- Turbine Hardstands
- Existing Roads to be Maintained
- Existing Roads to be Upgraded
- Proposed New Roads
- Proposed Borrow Pits
- Proposed Spoil Repository Areas
- Temporary Construction Compound
- Proposed Riparian Buffer
- Proposed Wet Grassland Management
- Proposed Woodland Management
- Proposed 110kV Substation
- Proposed 110kV Underground Grid Connection Route
- Turbine Delivery Route

Drawing Title
Proposed Wind Farm Layout

Project Title
Carrow Wind Farm

Drawn By	Checked By
ER	ER
Project No.	Drawing No.
231102	Figure 3
Scale	Date
1:14,000	2026-03-09

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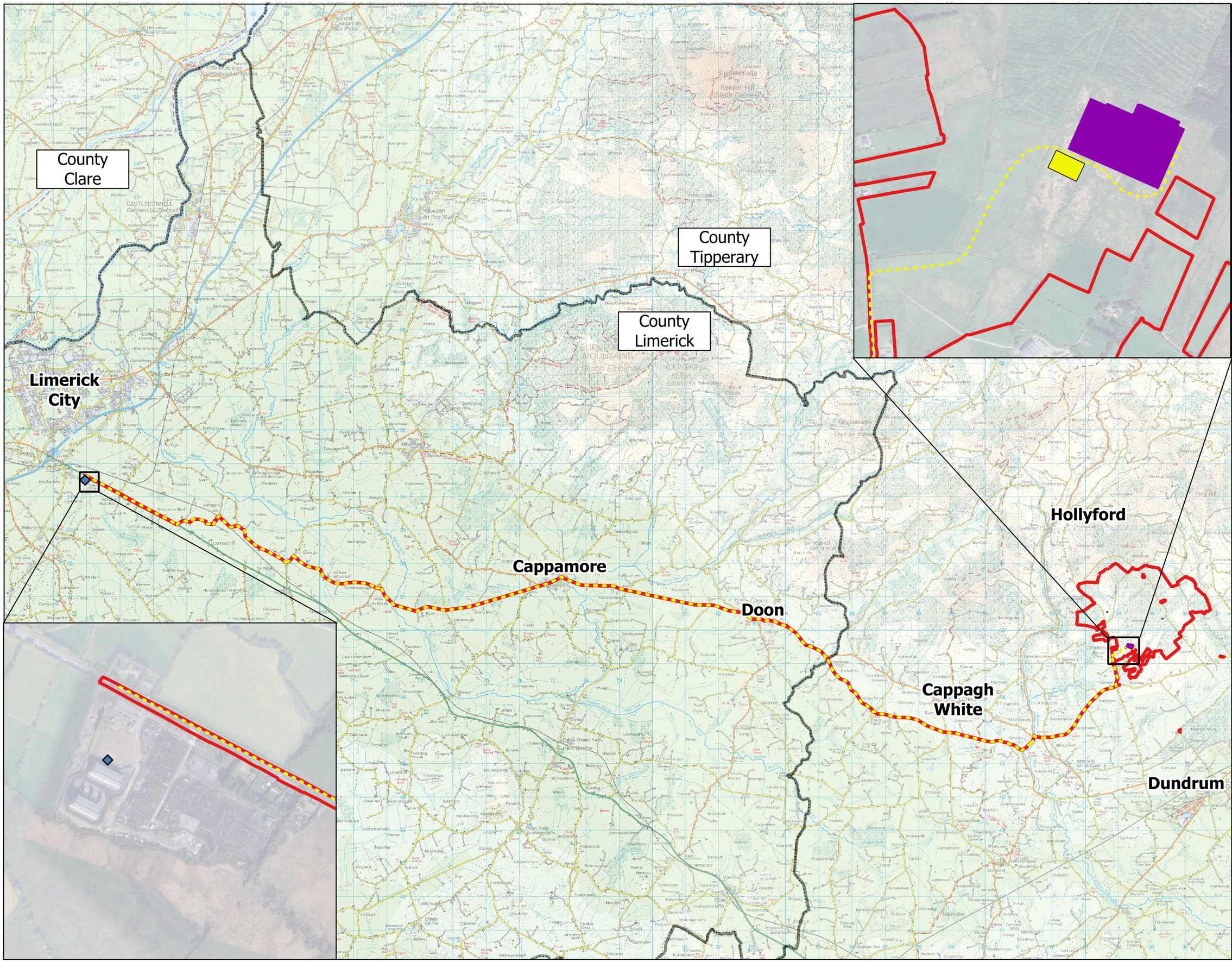

Drawing Title
Proposed Grid Connection Route Layout

Project Title
Carrow Wind Farm

Drawn By	Checked By
ER	ER
Project No.	Drawing No.
231102	Figure 4
Scale	Date
1:100,000	2026-03-09

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5. 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 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.

5.1 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, Carrow Renewable Energy Ltd. is associated with Atlantic Infrastructure Renewables (AIR), which has extensive experience in renewable energy and is responsible for several projects throughout Ireland, as well as several other countries. Atlantic Infrastructure Renewables invests 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; locations 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; and
- **Site Scale**: Sufficient area of unconstrained land that could potentially accommodate a wind farm development and turbine spacing requirements.
- **Local Policy**: alignment with the wind energy strategy (i.e., in an area deemed 'open to consideration' of the relevant local authority)

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 'Open to Consideration' within the Tipperary Wind Energy Strategy 2016.

5.2 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).

The constraints map for the Proposed Wind Farm, as shown in **Figure 5**, was produced following a desk study of all site constraints. **Figure 5** encompasses the following constraints and associated buffers (detailed further in **Chapter 3** of the EIAR):

- **Sensitive Receptors:** a minimum 740-metre setback from third party sensitive receptors (achieving the 4 x tip height separation distance from third party sensitive receptors in line with the draft Guidelines).
- **Designated Sites/Natura 2000:** a minimum 100-metre setback from Special Areas of Conservation, Special Protected Areas and Proposed Natural Heritage Areas.
- **Telecommunications:** Setback buffers determined following detailed assessment of telecommunication links that traverse the site. Refer to Appendix 15-3.
- **Transport:** a setback of 89.65m from local roads (Blade length + 10%)
- **Hydrology:** Watercourses plus 50-metre buffer.
- **Archaeology:** Archaeological Sites or Monuments: 50-metre buffer, plus 'Zone of Notification' as required by the National Monuments Service.

Facilitators at the Proposed Wind Farm 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.

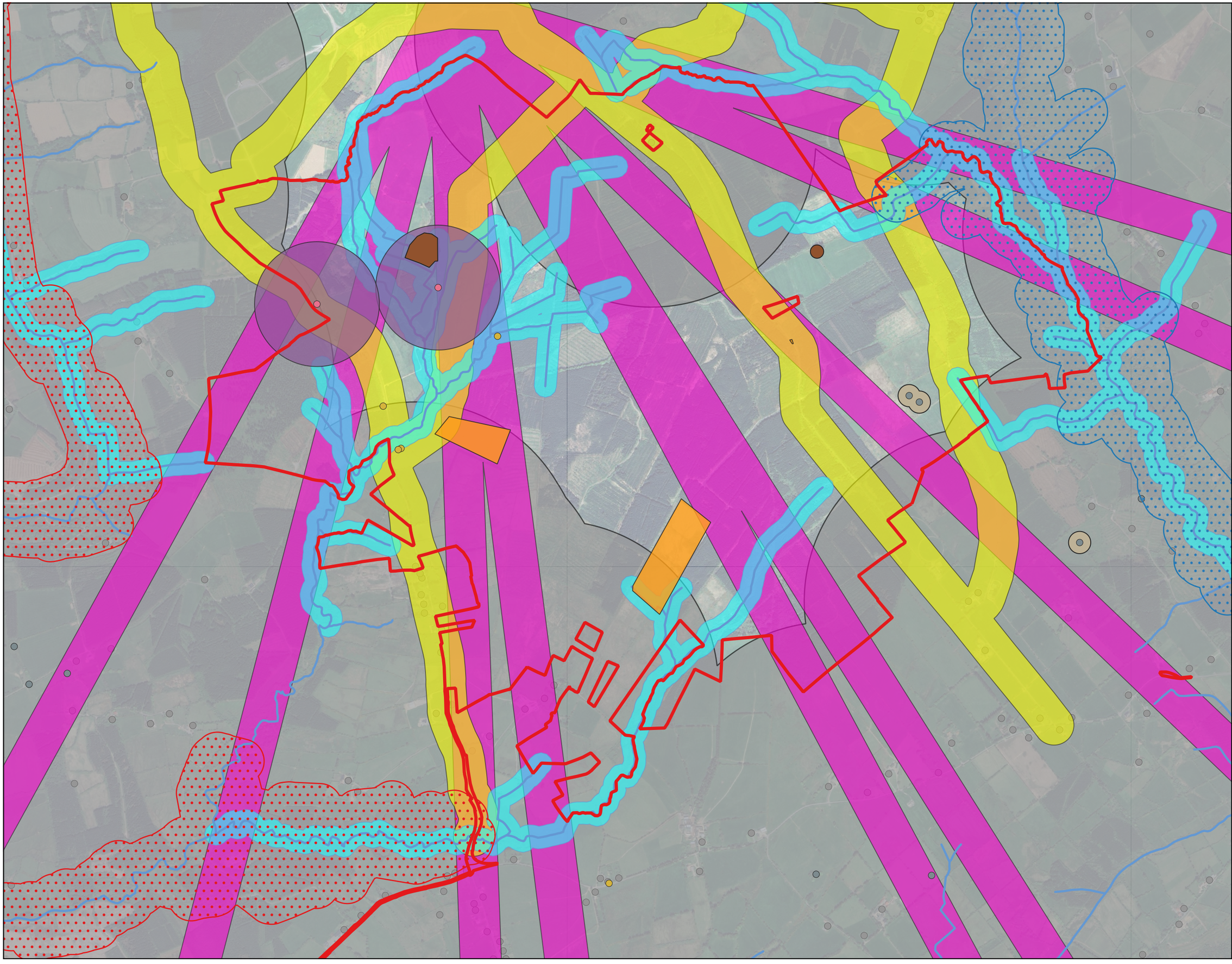
The hydrological and geotechnical investigations of the Proposed Wind Farm site examined the proposed locations for turbines, roads and other components of the Proposed Project, such as the construction compound. Where specific areas were deemed unsuitable for the siting of turbines or roads, etc., alternative 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 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 Proposed Grid Connection to Killonan 110kV substation and the proposed underground electrical cabling route has been revised and refined to take account of the findings of the site investigations and baseline assessments, which have informed the design. The Proposed Grid Connection is an underground grid connection cabling route, connecting the proposed onsite electricity substation to the existing Killonan 110kV substation. The cabling route is 37.6km in length and it utilises the local, regional and primary national road network and off-road private lands.

A key consideration in determining the grid connection method for a proposed wind energy development is whether the cabling is underground or run as an overhead line. An alternative to the Proposed Grid

Connection, which is approximately 37.6km underground cabling route, would be to construct an overhead line from the proposed onsite substation to the existing 110kV Killonan substation following a similar route to that of the Proposed Grid Connection. While overhead lines are less expensive and allow for easier repairs when required, underground cabling will have no visual impact. For this reason, it was considered that underground cabling would be a preferable alternative to overhead lines. The Guidelines (DoEHLG, 2006) also indicate that underground cables are the preferred option for connection of a wind energy development to the national grid. The underground electrical cabling will follow the route of existing public road insofar as possible in order to minimise the amount of ground disturbance required.



Map Legend

- Planning Application Boundary

Designated Sites/Natura 2000

- 100m Proposed Natural Heritage Area pNHA Setback
- 100m Special Areas of Conservation (SAC) Setback

Archaeological Sites/Monuments and Protected (NIAH) Structures

- National Monuments
- 50m National Monuments Buffer
- National Inventory of Archaeological Heritage
- Potential Heritage Sites

Ecology

- Confirmed Bat Roosts
- 281m Bat Roost Buffer
- Invasive Species Locations
- Devil's Bit Scabious Habitat

Hydrology

- Watercourses
- 50m Watercourse Buffer

Transport

- 90m Local Roads Buffer

Telecommunications

- Setback Buffers on Telecommunication Links

Sensitive Receptors

- Sensitive Receptors
- 740m Sensitive Receptor Buffer

Drawing Title
Environmental Constraints

Project Title
Carrow Wind Farm

Drawn By	Checked By
ER	EM
Project No.	Drawing No.
231102	Figure 5
Scale	Date
1:15,000	2026-03-09

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5.3 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.

6. PLANNING POLICY APPRAISAL

The following section provides a summary of the planning, renewable energy and climate policy context relevant to the Proposed Project. A more detailed and comprehensive breakdown of planning policy at all levels is set out in **Chapter 2** of the EIAR.

It is clear from the policies outlined below that the Proposed Project is strongly supported in principle by policy at all levels. The following section contains a synopsis of the current policies in place and their relevance to the Proposed Project.

The Proposed Project sits within a policy framework characterised by several recent crises, which have significantly influenced policy changes in recent years. These crises have heightened the imperative to transition towards a renewable energy-focused electricity grid and have emphasised the necessity for diversifying our energy sources.

The compliance summary table (**Table 6-1**) sets out an assessment of the Proposed Project in the context of relevant international, national and regional policy

6.1 International, National and Regional Planning Policy

6.1.1 International Policy

Paris Agreement

On an international level, Ireland is a signatory of the Paris Agreement, a global initiative adopted in 2015 that aims to address climate change by limiting global warming to well below 2 degrees Celsius above pre-industrial levels, with efforts to limit the increase to 1.5 degrees Celsius. Under the Paris Agreement, countries submit Nationally Determined Contributions (NDCs), outlining their individual climate action plans and commitments. Ireland's contribution comes under the European Union's (EU) NDCs targets and is based on the European Union's 2030 emissions reductions targets.

European Green Deal

On a European level, 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. The European Green Deal is intended to work through a framework of regulation and legislation setting clear overarching targets, e.g. a bloc-wide goal of net zero carbon emissions by 2050 and a 55% cut in emissions by 2030 (compared with 1990 levels). This is a substantial increase compared to the existing target, upwards from the previous target of at least 40% (2030 Climate & Energy Framework), and furthermore, these targets demonstrate the ambition necessary to keep the global temperature increase to well below 2°C and pursue efforts to keep it to 1.5°C as per the Paris Agreement.

The EU Fit for 55

The EU Fit for 55 package was published in late 2021 with the aim of reducing EU emissions by at least 55% by 2030 compared to 1990 levels and making the EU carbon-neutral by 2050. This EU package is a set of proposals to revise all existing EU acts on climate and energy and increase the EU target for renewables in the overall energy mix from 32% in 2030 to 40%.

Renewable Energy Directive & REPowerEU

In November 2023, a revision of the Renewable Energy Directive[11] (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 at 42.5%, with an ambition to reach 45% by 2030. This increase comes following the Russian invasion of Ukraine and the publication of REPowerEU plan in May 2022. REPowerEU aims to make Europe independent from Russian fossil fuels including oil and gas by rapidly transitioning to renewable energy. The plan aims to accelerate the scale up of renewables by speeding up the permitting process and placing renewable energy developments in the category of overriding public interest.
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"*** 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.**

6.1.2 National Policy

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.

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. The Commission, as a public body with consenting functions, must comply with this obligation in determining the subject application.

The Proposed Project will supply approximately 86.8MW of renewable electricity to the national grid, which represents a significant opportunity to contribute to the 51% reduction in emissions being sought, which is as outlined above as a legally binding requirement. The Proposed Project is therefore considered compliant with the relevant policies and objectives set out at both the European (e.g. European Green Deal) and national tiers of governance in this regard.

Climate Action Plan 2025

Originally published in 2019 and subsequently revised in 2021, 2023, 2024 and 2025 the Climate Action Plan (CAP) underscores the growing imperative to increase the presence of renewable energy generators on the national grid.

[11] *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)*

CAP 25 represents the third statutory update to Ireland's climate roadmap under the Climate Act. 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. 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).

National Development Plan 2021 – 2030

The National Development Plan 2021 – 2030 (NDP) 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 housing, health, population growth, and most relevant to the subject development, climate change. It is stated that the NDP will be the *'largest and greenest ever delivered in Ireland'*, and in this regard, the NDP highlights that extensive consultation was undertaken to ensure that the plan adequately supports the implementation of climate action measures.

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 an ambitious and an explicit driver for the deployment of new renewable generators such as the Proposed Project. The focus of investment in renewable energy infrastructure is to contribute to a long-term, sustainable and competitive energy future for Ireland.

The NDP is clear in its priority to reach a low-carbon, climate resilient society over the lifetime of the plan.

National Planning Framework First Revision (2025)

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

The Revised NPF provides an updated projection for the population of Ireland, with the population expected to increase to 6.1 million by 2040. This population growth will place further demand on both the built and natural environment, and subsequently, the services required to meet said demands.

Regional Renewable Energy Capacity Allocations have been introduced under the Revised NPF. This was one of the key actions for CAP24 and is supported under CAP25. The Southern Region and Eastern and Midlands Region, in which the Proposed Project is located, is allocated a target of installing an **additional 978MW and 1966MW of onshore wind energy, respectively, by 2030.**

Under **NPO 74** Regional Assemblies are required to plan for the delivery of the regional renewable electricity capacity allocations outlined in the Revised NPF and identify allocations for each of the local authorities within their RSES. Furthermore, **NPO 75** requires Local Authorities to plan for the delivery of Target Power Capacity (MW) allocations consistent with the relevant RSES, through their City and County Development Plans. At the time of writing, no local Target Power Capacity allocations have been established, however it is clear from the regional allocation that the Southern region is set to deliver a significant amount of onshore wind energy in the coming years.

The introduction of renewable energy targets represents a more active and prescriptive approach to land use planning for renewable energy development. The Revised NPF aligns the national target of 9GW of onshore wind energy with the policies and objectives of Local Authorities. In regard to this, it is clear that the provision of new renewable energy generation through the Proposed Project is in line with aims and objectives of the Revised NPF, which seeks to transition to a carbon neutral economy.

National Energy Security Framework

The National Energy Security Framework (NESF), adopted in 2022, and implements many of the aims and objectives of REPowerEU on a national level, reinforcing the State's requirement to urgently diversify away from imported fossil fuels and accelerate the roll out of renewables. The NESF is supported by the recently published Energy Security Package 'Energy Security in Ireland to 2030'. The Energy Security Package provides further long-term energy security measures which includes the prioritisation of achieving a renewables-led energy system.

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

The Programme for Government 2025 – Securing Ireland's Future (January 2025) places specific emphasis on climate change, recognising that time is critical in addressing the climate crisis. The Programme states that the Government is committed to taking *"decisive action to radically reduce our reliance on fossil fuels and to achieve a 51% reduction in emissions from 2018 to 2030, and to achieving net-zero emissions no later than 2050".*

The Programme states that the next ten years are a critical period in addressing the climate crisis, and therefore, a deliberate and swift approach to reducing more than half of Ireland's carbon emissions over the course of the decade (2020-2030) must be implemented. The programme states that the Government are committed to reducing Greenhouse Gas emissions by an average 7% per annum over the next decade in a push to achieve a net zero emissions by the year 2050.

With regard to renewable energy generation, the Programme notes that the Government is committed to the rapid decarbonisation of the energy sector. The Programme states the Government's ongoing support and commitment to take "*the necessary action to deliver at least 70% renewable electricity by 2030"*. This target has been updated by subsequent Climate Action Plans.

Wind Energy Development Guidelines 2006

In June 2006, the then Department of Environment, Heritage and Local Government (DoEHLG) published the Wind Energy Development Guidelines (the Guidelines (DoEHLG, 2006)) under Section 28 of the Act. The aim of the Guidelines (DoEHLG, 2006) was to assist the proper planning of wind power projects in appropriate locations around Ireland. The Guidelines (DoEHLG, 2006) also highlight general considerations in the assessment of all planning applications for wind energy. They set out advice to planning authorities on planning for wind energy through the development plan process and in determining applications for planning permission. They contain guidelines to ensure consistency of approach throughout the country in the identification of suitable locations for wind energy development.

Draft Wind Energy Development Guidelines 2019

The Department of Housing, Planning and Local Government (DoHPLG) published the draft Revised Wind Energy Development Guidelines (the Draft Guidelines (DoHPLG, 2019)) in December 2019. A consultation process in relation to the Draft Guidelines 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 (DoHLGH) and the Department of Environment, Climate and Communications (DoECC), particularly in relation to noise limits. 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 considered when local authorities prepare their development plans and assess planning applications, irrespective of the significant role renewable energy has to play in tackling climate change.

6.1.3 Regional Policy

Southern Regional Assembly Regional Spatial & Economic Strategy

The Regional Spatial & Economic Strategy (RSES) for the Southern Region 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.

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 energies 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.

At present, the RSES notes that the Region has more renewable energy generation than demand which indicates a strategic role for the region's energy assets in national energy generation and transmission. With projected increases in population and economic growth, the demand for energy is set to increase in the coming years.

The RSES for the Southern Region acknowledges that the region has a crucial role to play in Ireland transition to a low carbon future. It is considered that the provision of the Proposed Project would facilitate this just transition.

Table 6-1: EU, National & Regional Policy Objectives and Compliance Summary Table

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 its functions in a manner consistent with the Climate Action Plan 2024, 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 Project 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 NPF 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 dividend 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 capable of adhering to future wind energy guidelines.
Southern Regional Assembly Regional Economic and Spatial Strategy	**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 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 a renewable energy source and ensure our national and regional energy system remains safe, secure and ready to meet increased demand	The Proposed Project complies with the Southern Regional Assembly Regional Economic and Spatial Strategy (RSES) including RPO 87, RPO 96, RPO 98, RPO 99 and RPO221, which support 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
	as the regional economy grows. **RPO 98:** Regional Renewable Energy Strategy › It is an objective to support the development of a Regional Renewable Energy Strategy with relevant stakeholders. **RPO 99:** Renewable Wind Energy › It is an objective to support the sustainable development of renewable wind energy (on shore 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 › 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.	

Policy / Legislative Document	Targets / Objectives	Compliance
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.

6.2 Local Policy Context

6.2.1 Tipperary County Development Plan 2022 – 2028

The Tipperary County Development Plan 2022 – 2028 (TCDP) was adopted by the Elected Members of TCC on 11th July 2022 and came into effect on 22nd August 2022. The TCDP incorporates aims, objectives, policies and guidelines to provide for the proper planning and sustainable development of County Tipperary.

The TCDP supports and facilitates developments that produce energy from renewable sources, including wind, subject to compliance with environmental and planning criteria.

Section 3.1 of the TCDP focuses on climate action and outlines the Plan's objective:

> *'to support a transition to a climate resilient, biodiversity-rich, environmentally-sustainable and climate-neutral economy by 2050'.*

Section 10.4.1 of the TCDP outlines Renewable Energy Targets over the lifetime of the plan. This includes a target of 600MW of wind energy to be constructed and operational by 2028. At the time of publication, the TCDP states that 475 MW of wind energy is operational, resulting in an additional 125MW of wind energy required for the County to meet its targets for 2028.

The TCDP also includes policies and objectives relating to Natural Heritage, Biodiversity, Green/Blue Infrastructure, Landscape, Archaeology, Hydrology, Flooding, Noise, and Soils and Geology. A statement of consistency is provided in the **Table 6-2** below with each of the TCDP policies /objectives that are relevant to the Proposed Project. In conclusion, it is considered that the Proposed Project complies with all the relevant policies set out in the TCDP and is therefore in accordance with the proper planning and sustainable development of the area.

Table 6-2: Planning Policies and Objectives TCDP 2022-2028

Topic	Policy / Objectives	Compliance
Climate Action	**3-A:** Support and facilitate the implementation of European and National objectives for climate adaptation and mitigation, and to prepare a Climate Action Plan for Tipperary in compliance with the Climate Action and Low Carbon Development (Amendment) Bill (DECC, 2020) and any review.	The Proposed Project will provide renewable energy to the national electricity grid, contributing to towards renewable energy targets at a European, National and Regional level, thereby facilitating climate mitigation through reducing carbon emissions.
	3-C: Support and participate in the preparation of a Regional Decarbonisation Plan for the Southern Region as part of a framework for action on decarbonisation across all sectors.	Decarbonising our economy is reliant on the production of clean, renewable energy and the electrification of other carbon intensive sectors. The Proposed Project will increase the level of clean renewable energy on the national electricity grid.
	10-A: Support the Climate Action Plan (DECC, 2019) as it related to renewable energy production, having consideration to the strategic importance and potential benefits of renewable energy investment to rural communities.	The Proposed Project will produce 86.8MW of renewable energy, and involves the accumulation of a community benefit fund, which helps to support the local rural community.
	3-1: Promote and facilitate renewable energy development, in accordance with the policies and objectives of the Tipperary Renewable Energy Strategy 2016 (and any review thereof), and the Tipperary Climate Adaptation Strategy 2019.	The Proposed Wind Farm supports goals in the Tipperary Renewable Energy Strategy, particularly **TWIND4**; which refers to Tipperary's wind energy strategy. All of the turbines in the Proposed Project are in Areas 'Open for Consideration. The Tipperary County Council Local Authority Climate Action Plan 2024-2029 (LACAP) states that the actions and provisions set out in the Tipperary Climate Adaptation Strategy 2019 (CAS) have been included within the LACAP.

Topic	Policy / Objectives	Compliance
		The LACAP sets how Tipperary County Council intends to deliver and enable climate action for a just transition to a low carbon and climate resilient future within County Tipperary. The Proposed Project aligns with the aims of the LACAP, and thus the CAS, and will assist Co. Tipperary in reducing GHG emissions, as required under CAP 25, through the production of renewable energy.
	3-F: In accordance with the objective of the Renewable Energy Strategy (and any review thereof), to encourage and support community energy schemes, and ways to incorporate energy efficiency and renewable energy development at the community level, though micro-generation, auto-production and investment in commercial energy production.	The Proposed Project has the potential to bring about community investment opportunities. In addition to this, the community benefit fund will provide direct funding to those in the surrounding area of the Proposed Project. The Proposed Project will produce 86.8MW of renewable energy, and involves the accumulation of a community benefit fund, will provide direct funding to those in the surrounding area of the Proposed Project, which helps to support the local community.
Renewable Energy	**10-1:** Support and facilitate new development that will produce energy from local renewable sources such as hydro, bioenergy, wind, solar, geothermal and landfill gas, including renewable and non-renewable enabling plant, subject to compliance with normal planning and environmental criteria, in co-operation with statutory and other energy providers. The provisions of the Tipperary Renewable Energy Strategy (and any review thereof) as set out in Volume 3, will apply to new development.	The Proposed Project has the potential to generate circa 86.8MW of renewable energy which will be transferred to the National Grid. This will aid in facilitating new developments of local renewable sources.

Topic	Policy / Objectives	Compliance
	10-C: To continue to support renewable energy development and to maintain a positive framework for development through the review of the Renewable Energy Strategy over the lifetime of the Plan.	The Proposed Wind Farm supports goals in the Renewable Energy Strategy, particularly **TWIND4**; which refers to Tipperary's wind energy strategy. All of the turbines in the Proposed Project are in Areas 'Open for Consideration,'
Built Heritage	**13-4:** Safeguard sites, features and objects of archaeological interest, including Recorded Monuments, National Monuments and Monuments on the Register of Historic Monuments, and archaeological remains found within Zones of Archaeological Potential located in historic towns and other urban and rural areas. In safeguarding such features of archaeological interest, the Council will seek to secure their preservation (i.e. in situ or in exceptional circumstances preservation by record) and will have regard to the advice and recommendation of the Department of Arts, Heritage and the Gaeltacht. Where developments, due to their location, size or nature, may have implications for archaeological heritage, the Council may require an archaeological assessment to be carried out. This may include for a requirement for a detailed Visual Impact Assessment of the proposal and how it will impact on the character or setting of adjoining archaeological features. Such developments include those that are located at, or close to an archaeological monument or site, those that are extensive in terms of area (1/2 ha or more) or length (1 kilometre or more), those that may impact on the underwater environment and developments requiring EIA.	The Proposed Project application considers the impact on protected sites and monuments. The EIAR concludes that there will be 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.
Environment and Natural Assets	**11-1:** In assessing proposals for new development to balance the need for new development with the protection and enhancement of the natural environment and human health. In line with the provisions of Article 6(3) and Article 6 (4) of the Habitats Directive, no plans, programmes, etc. or projects giving rise to significant cumulative, direct, indirect or secondary impacts on European sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on	The Proposed Project application considers the impact on protected sites, habitats and species. The EIAR concludes that there will be no significant individual or cumulative effects on ecology at the international, national or county scales or on any of the identified Key Ecological Receptors (KERs).

Topic	Policy / Objectives	Compliance
	the basis of this Plan (either individually or in combination with other plans, programmes, etc. or projects).	
	11-2: Ensure the protection, integrity and conservation of European Sites and Annex I and II species listed in EU Directives. Where it is determined that a development may individually, or cumulatively, impact on the integrity of European sites, the Council will require planning applications to be accompanied by a NIS in accordance with the Habitats Directive and transposing Regulations, 'Appropriate Assessment of Plans and Projects, Guidelines for Planning Authorities', (DEHLG 2009) or any amendment thereof and relevant Environmental Protection Agency (EPA) and European Commission guidance documents.	The impact of the Proposed Project on designated sites is considered in full in the EIAR and the Natura Impact Statement (NIS). Chapter 6 of the EIAR and the NIS conclude that the Proposed Project will not give rise to any significant negative impacts on designated sites.
	11-4: (a) Conserve, protect and enhance areas of local biodiversity value, habitats, ecosystems and ecological corridors, in both urban and rural areas, including rivers, lakes, streams and ponds, peatland and other wetland habitats, woodlands, hedgerows, tree lines, veteran trees, natural and semi-natural grasslands in accordance with the objectives of the National Biodiversity Plan (DCHG 2017) and any review thereof. (b) Safeguard, enhance and protect water bodies (rivers/canals/lakes) and river walks and to provide links, where possible, to wider green infrastructure networks as an essential part of the design process. (c) Require an 'Ecosystems Services' approach for new development to incorporate nature-based solutions to SUDS, in so far as practical, as part of water management systems, public realm design and landscaping, in line with best practice. (d) Where trees or hedgerows are of particular local value, the Council may seek their retention, or where retention is not feasible, their replacement and will seek a proactive focus on new tree-planting as part of new development.	As detailed in Chapter 6 of the EIAR, the Proposed Project has been designed to avoid or mitigate impacts on biodiversity. The Proposed Project application includes an Appropriate Assessment prepared in line with the Birds and Natural Habitats Regulations 2011.
	11-5:	As detailed in the assessment in Chapter 9 of the EIAR, no significant effects on surface water or

Topic	Policy / Objectives	Compliance
	Ensure that new developments proposed in or near 'Ground Water Protection Schemes' and 'Zones of Contribution' which contribute to public water supplies, do not result in a significant negative impact on the integrity, function and management of these important assets	groundwater quality will occur as a result of the Proposed Project.
	11-7: a) Ensure the protection of water quality in accordance with the EU WFD, and support the objectives and facilitate the implementation of the associated Programme of Measures of the River Basin Management Plan 2018-2021 and any successor. This includes contributing towards the protection of Blue-Dot catchments and drinking water resources. Also, have cognisance of the EU's Common Implementation Strategy Guidance Document No. 20 and 36 which provide guidance on exemptions to the environmental objectives of the WFD. b) Support an integrated and collaborative approach to catchment management in accordance with the River Basin Management Plan 2018-2021 and any successor. c) Require an undisturbed edge or buffer zone to be maintained, where appropriate, between new developments and riparian zones of water bodies to maintain the natural function of existing ecosystems associated with water courses and their riparian zones, and to enable sustainable public access.	A Water Framework Directive Assessment is included in Appendix 9-3 of the EIAR.
	11-9: Assess all new developments (both within and without designated Flood Risk Zones) in line with the 'Staged Approach' and pre-cautionary principle set out in the Planning System and Flood Risk Management Guidelines for Planning Authorities, (DEHLG, 2009) and any amendment thereof, and the following: (a) Require the submission of site-specific Flood Risk Assessments for developments undertaken within Flood Zones A & B and on lands subject to the mid-range future scenario floods extents, as published by the OPW. These Flood Risk Assessments shall consider climate change impacts and adaptation measures including details of structural and non-structural flood risk management measures, such as those relating to floor levels, internal layout, flood-resistant construction, flood-resilient construction, emergency response planning and access and egress during flood events.	The Proposed Wind Farm has been designed, cognisant of the fluvial flood risk at the Proposed Wind Farm site. As detailed in the assessment in **Chapter 9** of the EIAR, no significant effects on surface water or groundwater quality will occur during the construction and operational phases of the Proposed Project.

Topic	Policy / Objectives	Compliance
	(b) SFRAs and site-specific flood risk assessments shall provide information on the implications of climate change with regard to flood risk in relevant locations. The 2009 OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management (or any superseding document) shall be consulted with to this effect. (c) Ensure each flood risk management activity is examined to determine actions required to embed and provide for effective climate change adaptation as set out in the OPW Climate Change Sectoral Adaptation Plan for Flood Risk Management applicable at the time. (d) Applications for development on land identified as 'benefitting land' may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas. (e) Require applications for new development, or for an extension to an existing development on land zoned for 'Social and Public' or 'Amenity' use and where a potential flood risk is identified, and where the proposed use might be vulnerable, to be sub	
	11-12: In assessing proposals for new development to seek to protect, support and conserve the geological heritage sites of Tipperary and their value as outlined in the Tipperary Audit of Geological Heritage Sites, (GSI/TCC, 2019).	As detailed in the assessment in Chapter 8: Geology & Soils of the EIAR, no significant effects on land, land use, peat, soil and bedrock will occur.
	11-16: Facilitate new development which integrates and respects the character, sensitivity and value of the landscape in accordance with the designations of the Landscape Character Assessment, and the schedule of Views and Scenic Routes (or any review thereof). Developments which would have a significant adverse material impact on visual amenities will not be supported.	The Proposed Wind Farm site is predominantly comprised of commercial forestry and pastoral agriculture land. The Landscape Visual Impact Assessment (LVIA), as outlined in Chapter 13 of the EIAR, deems the landscape value of the Proposed Wind Farm site as 'Low'. The LVIA concludes that the Proposed Wind Farm is deemed to be acceptable from a landscape and visual perspective. Photomontages accompany the Landscape and Visual Assessment and are included in Volume 2 of the EIAR.

6.2.2 Development Management Standards

Appendix 6 of the TCDP 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. It details the manner in which the Planning Authority has implemented the policies and objectives contained within the Section 28 guidelines. In relation to the Proposed Wind Farm, the document refers to the Wind Energy, Guidelines for Planning Authorities (DEHLG, 2006), and how these guidelines are addressed within their planning documents.

The relevant considerations under the '*Wind Energy Development Guidelines for Planning Authorities'* (Department of the Environment, Heritage and Local Government (DOEHLG), 2006) have been taken into account when designing the Proposed Project.

The '*Wind Energy Development Guidelines for Planning Authorities'* (DoEHLG, 2006) (hereafter referred to as the 'DoEHLG 2006 Guidelines') were the subject of a targeted review. The proposed changes to the assessment of impacts associated with onshore wind energy developments were outlined in the document the Draft Guidelines (DoHPLG, 2019). At time of writing, the Draft Guidelines (DoHPLG, 2019) have not yet been adopted, and the relevant guidelines for the purposes of section 28 of the Planning and Development Act 2000, as amended, remain those issued in 2006.

The distance from proposed turbines to third party sensitive receptors will achieve the proposed 4 times turbine tip height set out in the Draft Guidelines (DoHPLG, 2019) and to the extent any adopted new Guidelines include more onerous noise or shadow flicker requirements, these can be readily achieved by implementing appropriate mitigation through use of the turbine control systems.

The Proposed Project is in alignment with the Guidelines (DoEHLG, 2006) which form the basis for the assessment of wind energy developments against the Development Management Standards outlined in the TCDP. It is therefore contended that the Proposed Project is aligned with the Development Management Standards.

6.2.3 Renewable Energy Strategy

Tipperary Renewable Energy Strategy 2016

The Tipperary Renewable Energy Strategy (RES) was published in 2016 and is incorporated into the TCDP as Appendix 2 of Volume 3. The RES has been developed as a planning framework to support the implementation of renewable energy in the county. As the RES was published in 2016, it was developed to meet the policies and objectives of the North Tipperary County Development Plan 2010 (as varied) and the South Tipperary County Development Plan 2009 (as varied). Objective 10-C of the TCDP aims to review the RES over the lifetime of the plan. The current RES remains in effect until the review and update take place. The TCDP sets out the strategic aim of the RES as follows:

> *"It is a strategic aim of the Renewable Energy Strategy to facilitate a low-carbon future in Tipperary by supporting the sustainable development of the renewable energy sector in Tipperary."*

The RES includes policy objectives that support the development of renewable energy and wind energy in County Tipperary. These policies are included in **Table 6-3** below

Table 6-3: RES Policy Objectives

Policy Objective	Description	Proposed Project Compliance
Policy RE1: Protection of the Environment	It is the policy of the Council that renewable energy developments and associated supporting infrastructure shall be assessed for compliance with the environmental standards and policies as set out in the County Development Plan (as varied) and the Development Management standards set out in Chapter 10.	From a review of the policies outlined in the TCDP, it is evident that the Proposed Project is consistent with the environmental standards and objectives set out in the TCDP, as outlined in Table 6-2 of this Planning Report. The design and layout of the Proposed Wind Farm follows the recommendations and guidelines set out in the Guidelines (DOEHLG, 2006), and the *'Best Practice Guidelines for the Irish Wind Energy Industry'* published by the Irish Wind Energy Association in 2012. The design and layout of the Proposed Wind Farm also has regard to the Draft Guidelines (DoHPLG, 2019). Should the draft Guidelines be adopted in advance of a planning decision being made on the Proposed Project, the Proposed Project will be capable of achieving the requirements of the draft Guidelines as currently proposed. The Proposed Project is in alignment with the DoEHLG 2006 Guidelines which form the basis for the assessment of wind energy developments against the Development Management Standards outlined in the TCDP.
Policy RE2: Landscape Capacity and Renewable Energy Development	It is the policy of the Council to facilitate new development which integrates with and respects the character, sensitivity and value of the landscape in accordance with the guidelines set out in the Tipperary Landscape Character Assessment 2016 and the policies as set out in the County Development Plan (as varied) and the Development Management standards set out in Chapter 10.	The Proposed Project is an appropriately designed development, sited in a modified working landscape of significantly low population density within marginal upland, deemed capable of accommodating wind energy development. The Proposed Wind Farm site has been designed in accordance with the guidelines set out in the Tipperary Landscape Character Assessment 2016 and the policies as set out in the TCDP and the Development Management standards set out in Chapter 10. Please refer to Chapter 14 of the EIAR for further details.

Policy Objective	Description	Proposed Project Compliance
Policy RE3: Community Investment in Local Renewable Energy	It is the policy of the Council to support and facilitate renewable energy proposals that bring about a direct socio-economic benefit to the local community. The Council will engage with local communities and stakeholders in energy and encourage developers to work with local communities to identify how they can invest in/gain from significant renewable energy development.	The Proposed Project has the potential to bring significant positive benefit to the local community through the creation of local employment, the contribution of annual rates to the local authority, community investment opportunities and the community benefit fund which will provide direct funding to those in the surrounding area of the Proposed Project. Please refer to Chapter 4 and Chapter 5 and Appendix 2-3 for further details on the potential socio-economic benefits of the Proposed Project to the local community.
Renewable Energy Objective SO1:	It is an objective of the Council to support the implementation of the targets and objectives of the White Paper for Energy 2015.	The Proposed Project, if consented, will provide clean, renewable energy to the national grid and thus will directly contribute to the target of an 80–95% reduction in GHG emissions produced by Ireland's energy sector (compared to 1990 levels), as set out in the White Paper '*Ireland's Transition to a Low Carbon Energy Future 2015–2030'*. The Proposed Project affords Tipperary the opportunity to contribute 86.8MW of renewable energy to the electricity sector, which would aid the targets and objectives of the White Paper.

6.2.3.2 Tipperary Wind Energy Strategy 2016

Appendix 1 of the RES outlines the Wind Energy Strategy (WES) for County Tipperary. The aim of the Wind Energy Strategy is to set out one integrated, comprehensive suite of policies for wind energy development in Tipperary;

> *"The aim of this Strategy is to .... develop an updated, county-wide tool for identifying potentially suitable locations for wind energy development and to guide future assessment of wind energy planning applications in the county".*

In relation to wind energy policy, the WES includes the objectives set out in **Table 6-4** that are relevant to the Proposed Project:

Table 6-4: Wind Energy Strategy Planning Objectives

Planning Objectives	Description
TWIND 1:	*It is the policy of the Council to support, in principle and in appropriate locations, the development of wind energy resources in county Tipperary. The Council recognises that there is a need to promote the development of 'green electricity' resources and to reduce fossil fuel dependency and greenhouse gas emissions in order to address the global issue of climate change, and to comply with European and International policies with regards to renewable and sustainable energy resources.*
TWIND 2:	*It is the policy of the Council to ensure that all wind energy development in the county complies with the provisions of all applicable government legislation and guidance on wind energy development and renewable energy resources (and any review thereof).*
TWIND 3:	*It is the policy of the Council that when assessing planning applications for wind energy development, to require compliance with the Wind Energy Development Guidelines, Guidelines for Planning Authorities (DoEHLG) 2006 or any revision thereof, and the policy and objectives of the County Development Plan (as Varied).*
TWIND 5:	*It is the policy of the Council that when granting planning permission for wind energy developments, to have regard to the proper planning and sustainable development of the area and in particular Chapter 7 of the Wind Energy Development Guidelines, Guidelines for Planning Authorities (DoEHLG) 2006 or any revision thereof. In addition, the Council may include conditions regarding: a) Surface water management plans; b) Environmental management plans for all phases of the development; c) Limiting construction to a certain part of the year; d) Duration of the planning permission and eventual decommissioning of the development; e) Landscaping; f) Surveys on birds and relevant protected species and other baseline environmental data collection; and, g) Ongoing monitoring during operation of the wind energy development h) Monitoring during construction phase i) Protection of habitats and species of conservation concern j) Protection of designated sites.*

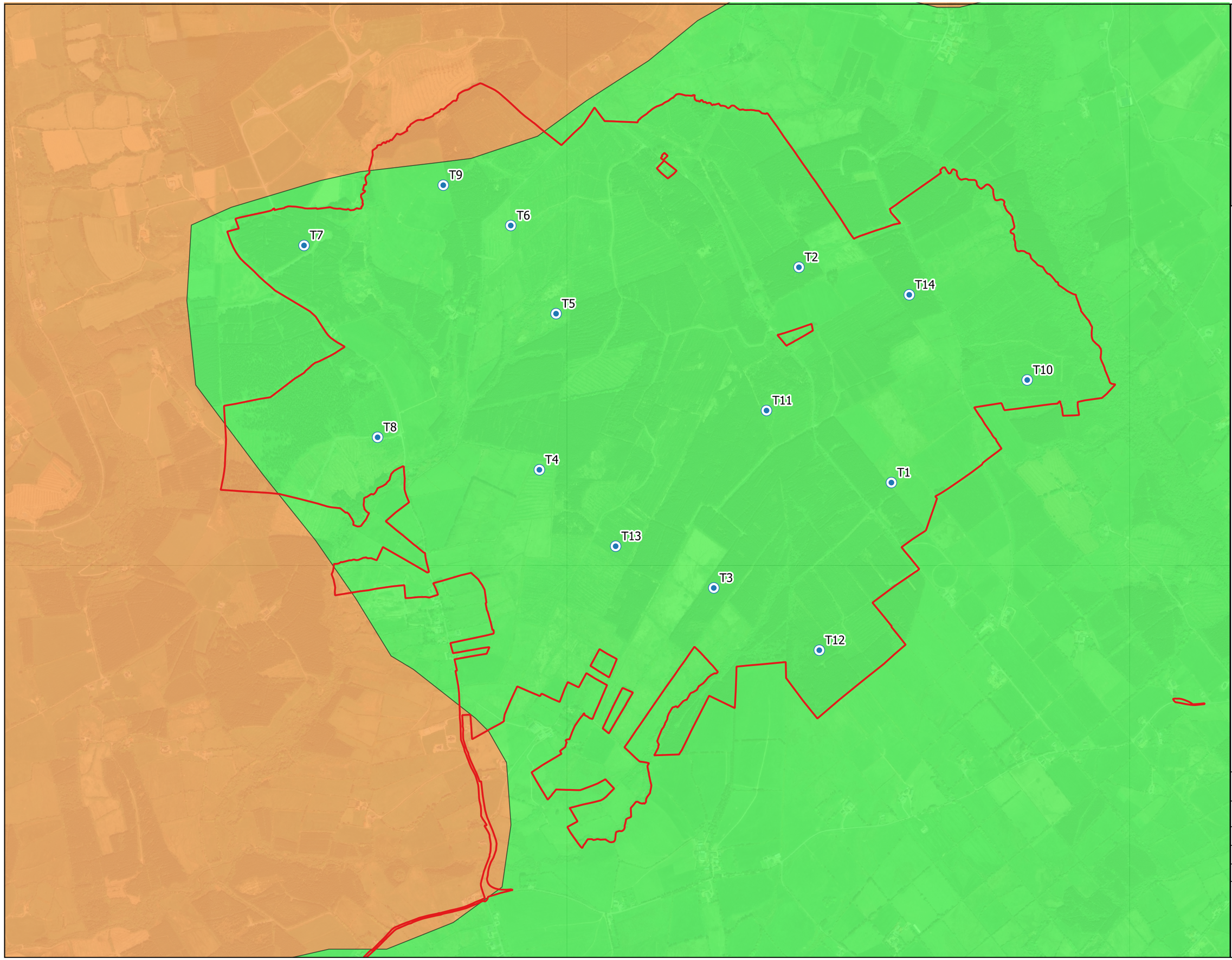
The WES identifies two 'policy areas' for wind energy developments. They are as follows:

- ***Areas 'Open for Consideration'*** *- wind energy development in these areas may or may not be appropriate, depending on the character of the landscape and the potential impact of the*

proposed development. Any impact on the environment must be low and subject to proper planning and sustainable development, and the guidelines set out in this policy document.

- ***Areas 'Unsuitable for Further Development'** - new wind energy development in these areas is not permitted. These areas have a special or unique landscape character where the main objective is conservation. Where there are existing wind energy developments in these areas, their repowering may be considered appropriate. Any impact on the environment must be low and subject to proper planning and sustainable development, and the guidelines set out in this strategy.*

The proposed wind turbines are located wholly in an area deemed 'Open for Consideration', see **Figure 6** below.



Map Legend

- Planning Application Boundary
- Proposed Turbine Locations

County Tipperary Wind Strategy Areas

- Area Open for Consideration
- Areas Unsuitable

Drawing Title: County Tipperary Wind Energy Strategy and Proposed Turbines

Project Title: Carrow Wind Farm

Drawn By	Checked By
ER	EM
Project No.	Drawing No.
231102	Figure 6
Scale	Date
1:15,000	2026-03-19

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Areas that are categorised 'Open for Consideration' are also subject to the following guidelines set out in **Table 6-5** below:

Table 6-5: Wind Energy Strategy Planning Objectives - Areas 'Open for Consideration'

TWIND 4.1	*Proposals shall demonstrate conformity with existing and approved wind farms to avoid visual clutter. In this respect, developers should consider the cumulative impact of new development in the context of the location of both existing and permitted developments.*	The visual impact of the Proposed Project regarding the cumulative impact of existing and approved wind farms in the location context has been fully assessed within Chapter 14 of the EIAR. A planning search was carried out to establish permitted, operational and proposed wind energy developments within 25km of the proposed turbines for the purposes of informing the potential cumulative effects and is included at Table 2-6 of this Chapter and within Chapter 14 of the EIAR. Within 5km of the Wind Farm site, there is potential for in-combination cumulative visual effects as the area currently contains multiple existing wind farms and the Proposed Wind Farm will be positioned in close proximity to certain developments. Beyond 5km the proposed turbines will have limited or very limited contribution to the cumulative visual effects from the Wind Farm site. Please refer to Chapter 14 of the EIAR for further details.
TWIND 4.2	*Proposals in Areas 'Open for Consideration' shall be sited having consideration to the landscape sensitivity and capacity analysis set out in the Tipperary Landscape Character Assessment 2016 and the provisions of the County Development Plan (as varied) in relation to landscape (Chapter 7). All applications shall have regard to the visual impact of turbines and ancillary development (such as access roads, boundary fencing, control buildings and grid connections).*	A suite of policies relating to landscape designations and sensitivities, and protected amenities out in the TCDP and the Tipperary Landscape Character Assessment 2016 were consulted for the design of the Proposed Project. Please refer to Chapter 14 of the EIAR for further details.
TWIND 4.3	*Within Areas 'Open for Consideration', proposed development within areas which already accommodate turbines, sub-stations and powerlines shall be considered appropriate from a sequential approach to the development of infrastructure, until these areas reach capacity.*	The Proposed Wind Farm site is sited within an area already established with wind energy developments, with the landscape having a high compatibility to wind energy development and high capacity to accommodate development.

TWIND 4.4	*All Projects are required to be screened for Appropriate Assessment Screening in accordance with Article 6(3) of the Habitats Directive and the provisions of the County Development Plan (as varied).*	The EIAR and NIS submitted with this planning application have been completed in accordance with Article 6(3) of the Habitats Directive and the provisions of the TCDP. Both the EIAR and NIS contain the information necessary for the Commission, to complete the Environmental Impact Assessment and Appropriate Assessment as required for the planning permission application.
TWIND 4.5	*Applications for wind development shall be accompanied by a technical assessment in relation to the slope stability, landslide susceptibility of the development site and the proposed project. This assessment shall incorporate slope stability mapping and groundcover assessment in the context of potential cumulative effects arising from multiple developments.*	Chapter 8 of the EIAR undertakes a comprehensive assessment of slope stability and landscape susceptibility of the Proposed Project.
TWIND 4.6	*All proposals for wind energy development will have regard to the cumulative effect of the development on the environment when considered in conjunction with other existing and permitted wind energy developments in the area.*	To gather a comprehensive view of cumulative impacts within the cumulative study area and to inform the EIA process being undertaken by the consenting authority, each relevant chapter within the EIAR addresses the potential for cumulative effects on the environment where appropriate and within the context of their identified cumulative study area.
TWIND 4.7	*All applications will have regard to the impact on existing built environment, particularly neighbouring residential properties and other sensitive amenity areas.*	The Proposed Project exceeds the recommended 500m setback from residential properties (DoEHLG 2006 Guidelines) and adheres to the prescribed 4-times-tip-height (740m) setback distance for residential visual amenity (the Draft Guidelines (DoHPLG, 2019).
TWIND 4.8	*All applications will have regard to the impact of any proposal for wind energy development on surrounding tourism and recreational related activities and the compatibility of same will be carefully considered in the assessment of any planning application.*	Chapter 5 of the EIAR assess the impact of the Proposed Project on tourism and amenities in the surrounding area. There are no key identified tourist attractions pertaining specifically to the Site. It is considered that the Proposed Project together with other projects in the area will not cumulatively affect any tourism infrastructure in the wider area.
TWIND 4.9	*All applications will have regard to the impact of any proposal for wind energy development in the context of any flood risk in the area. A*	A Flood Risk Assessment is included at Appendix 9-1 of the EIAR.

	comprehensive flood risk assessment for proposals in an area at risk of flooding, adjoining same or where cumulative impacts may result in a flood risk elsewhere, in low lying areas or in areas adjacent to streams.	
TWIND 4.10	*All applications will ensure that details of the proposed grid connection and all associated infrastructure are considered in the Environmental Impact Statement (EIA) and Natura Impact Statement as may be required.*	The EIAR and NIS which accompany this application consider and assess the Proposed Project in its entirety, inclusive of the Proposed Grid Connection.
TWIND 4.11	*All applications will have regard to the impact on rivers and streams and will demonstrate compliance with the Water Framework Directive.*	A Water Framework Directive Assessment is included at Appendix 9-3 of the EIAR.
TWIND 4.12	*Wind energy development proposed in areas of lowland raised bog/peatland shall ensure that negative impacts including habitat disturbance and loss, and avoidance of hydrological disruption and risk of erosion are avoided or mitigated through design. Site specific geo-technical investigations shall be submitted as part of EIA unless otherwise agreed with the council.*	Geological mapping and ground investigations of the Site were undertaken as part of the assessment of the Site. Please refer to Chapter 8 of the EIAR for further details.

The WES notes that areas of the County designated as 'Open for Consideration' have the potential for wind farm developments. The Proposed Wind Farm's siting within an area deemed by the Council to be 'Open for Consideration', demonstrates that the Proposed Wind Farm is appropriately located for the development of wind energy and is aligned with the objectives of the WES that is incorporated into the TCDP.

Furthermore, as demonstrated above in **Table 6-5**, the planning objectives that have informed this designation - landscape and visual impacts, ecology, recreation, cultural heritage and limited wind regime have been fully considered and assessed as part of this EIAR. These assessments have determined that the Proposed Project will not give rise to any significant adverse effects in regard to these factors. It is therefore considered that the location of these turbines will not result in any significant environmental or visual effects and are appropriate at this location.

County Tipperary's Wind Energy Target

County Tipperary's RES sets out the existing and projected quantum of renewable energy in the County throughout the CDP. The overall projection for renewable energy is a target of 600MW of wind energy to be constructed and operational by 2028. At the time of publication, the TCDP states that 475MW of wind energy is operational, resulting in an additional 125MW or an approximate 25% increase of wind energy required for the County to meet its targets for 2028. The Proposed Project has the potential to provide 86.8MW of renewable energy to the national grid, which would account for almost 70% of the total 125MW required. The bringing forward of appropriately located and well-designed renewable energy projects, including the Proposed Project will be a crucial factor if this ambitious goal is to be reached.

6.2.4 Limerick Development Plan 2022-2028

The Limerick Development Plan 2022-2028 (LDP) was adopted in June 2022 and effective as of July 2022. The LDP is clear in its support for the development of wind energy, as set out in Section 9.4.4;

> *'The Council recognises the significant contribution that wind energy can make as a clean sustainable solution to energy requirements and the role it can play in helping achieve national targets, in relation to fossil fuel reductions and consequently greenhouse gas emissions.'*

The LDP also contains clear policy objectives supporting the development of renewable energy:

- ***Objective CAF 027 – Renewable Energy Production:*** *It is an objective of the Council to encourage and facilitate the production of energy from renewable sources, such as from bioenergy, solar, hydro, tidal, geothermal and wind energy, subject to appropriate levels of environmental assessment and planning considerations.*

Most relevant to the Proposed Project, is the LDP's support for the development of the electricity as outline in the following objective:

- ***Objective IN015 - Electricity Grid Development:*** *It is an objective of the Council to support the Eirgrid Grid Development Strategy - Your Grid, Your Tomorrow (2017) (ENCL1), to serve the future electricity needs of Limerick. This includes the delivery, integration and connection of renewable energy proposals to the grid in a sustainable and timely manner, subject to appropriate environmental assessment and the planning process.*

The Proposed Grid Connection Route seeks to utilise the Killonan 110kV substation, facilitating the Proposed Wind Farm's connection to the national grid. The LDP recognises Killonan 110kV Substation as an 'important node' for the supply of electricity to Limerick City and the Mid-West Region. The LDP

also states it's support for EirGrid's *'Transmission Development Plan 2020-2029'* which includes the redevelopment of Killonan Station.

6.3 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 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 (SRA) region as called for in the RSES which sets a clear precedent 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 prioritise the development and adoption of renewable energy technologies.

Locally, the TCDP supports the Proposed Project as it sets out the need for Tipperary 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 TCDP is to generate 100% of the County's electricity demand through renewable energy by 2030, the Proposed Project will support the TCDP in this aim. The LDP also seeks to support the connection of renewable energy developments to the national grid and also recognises the Killonan 110kV substation as a key supplier of electricity to the Mid-West Region.

If the Proposed Project were not to proceed, the opportunity to capture this additional part of County Tipperary'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.

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 anticipated that the Proposed Project will be capable of adhering to the relevant noise and shadow flicker standards, albeit without sight of the final, the Draft Guidelines (DoHPLG, 2019), the processes by which the Proposed Project will comply with the same cannot be confirmed at this stage. While the final Draft Guidelines (DoHPLG, 2019) 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.

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 TCDP supports the Proposed Project as it sets out the need for Tipperary 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. The Proposed Project will support the TCDP in it's aim to generate 100% of the County's electricity demand through renewable energy by 2030. The LDP also seeks to support the connection of renewable energy developments to the national grid and also recognises the Killonan 110kV substation as a key supplier of electricity to the Mid-West Region.

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 comprehensive desk studies, NPWS consultation, and suite of field surveys. 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.

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 the Commission 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. Tipperary'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 7-1 provides a summary of the Proposed Project under these key material environmental considerations and identifies the relevant chapters of the EIAR where they are specifically addressed.

Table 7-1: 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 it is anticipated that the Proposed Project will be capable of adhering to the relevant future noise guidelines. • **Shadow Flicker**: The EIAR confirms shadow flicker levels will meet the Guidelines (DoEHLG, 2006) limits at all Sensitive Receptors and it is anticipated that the Proposed Project will be capable of adhering to the relevant future shadowflicker guidelines. • **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 14 – 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	As detailed in the assessment in Chapter 8: Geology & Soils of the EIAR, no significant effects on land, land use, peat, soil and bedrock will occur.	**Ch.8 – Geology & Soils**

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. A Fire Risk Management & Emergency Response Plan (**Appendix 4-4**) for the proposed BESS compound will be implemented in the unlikely event of a fire. No significant effects on the surface water quality will occur in the event of a BESS Fire.	**Ch.9- Water** **Appendix 4-4 – Fire Risk Management Emergency Response Plan**
Air Quality	It is considered there will be no measurable negative cumulative effects on air quality should other proposed or consented plans and within the surrounding landscape be operational in parallel with the Proposed Project. However, once the Proposed Project is operational, there will be a long-term, moderate, positive impact on the air quality.	**Ch.10 – Air Quality**
Climate	There will be no cumulative effects arising on climate from the Proposed Project and other permitted or proposed projects in the area as set out in Section 2.9 in Chapter 2 of this EIAR. While there will be greenhouse gas emissions associated with the construction of the Proposed Project, will be offset by the operation of the Proposed Project within its operational life.	**Ch.11 - Climate**
Archaeology & Cultural Heritage	There will be no significant residual effects on the archaeological, architectural and cultural heritage resource. There will be residual effects on the archaeological, architectural and cultural heritage resource, due to indirect effects on the setting of a number of recorded sites and structures and whilst this is a long-term effect, it is not permanent. These are detailed in Appendix 13-6. No cumulative effects have been identified upon the archaeological, architectural and cultural heritage resource that are greater than effects already predicted as part of each individual development and effects predicted as part of the Proposed Project.	**Ch.13 Cultural Heritage**

Landscape & Visual Impact Assessment	The LVIA concludes that the Proposed Wind Farm is deemed to be acceptable from a landscape and visual perspective. No residual Significant effects will occur on designated landscape and visual receptors or scenic sensitivities of county, regional or national renown.	**Ch.14 Landscape**
Material Assets	During construction stage of the Proposed Project, it is forecast that the additional traffic that will appear on the public road network serving the Site will have a short-term slight negative effect on residents and existing road users on the delivery route. The implementation of the mitigation measures included in the proposed traffic management plan will ensure a controlled and efficient operation during this stage, and minimise the impacts on local road users. There will be no residual effects during the operational stage. In the event that the construction phase of the Proposed Project overlaps with either of these developments it is estimated that the cumulative impacts will be negative, short term and will be slight. There will be no significant impacts. During the decommissioning phase, the residual effect will be less than for the construction stage as set out above and will be slight to imperceptible.	**Ch. 15 Material Assets**

8. CONCLUSION

The provision of wind energy developments such as the one proposed 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% by 2030 as set out in the CAP25.

It is demonstrated through the assessment of the Proposed Wind Farm site against the RES, that it is a suitable site for wind energy development. From a review of the sieve analysis mapping, the primary areas of the Proposed Wind Farm site are zoned as 'Open to Consideration'. This has been considered in the planning application and comprehensively assessed in the EIAR. The Proposed Wind Farm is designed to limit the impact on all environmental receptors, with mitigation proposed where impacts are predicted to arise.

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 86.8MW 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.

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 the Commission the relevant planning context that applies, and grants permission for the Proposed Project which is the subject of this application.