2. BACKGROUND TO THE PROPOSED PROJECT

This chapter of the EIAR presents the policies and targets which have been put in place at the various levels of Government including international, national, regional and local in relation to planning, renewable energy and climate change which are relevant to the Proposed Project. The details below set out the need for the Proposed Project as it will directly aid Ireland in meeting its national targets and European commitments in relation to climate change and decarbonisation.

This chapter summarises the EIAR scoping exercise, the pre-planning and community consultation undertaken and the Cumulative Impact Assessment process.

This chapter also provides a summary of the planning policy context relevant to the Proposed Project and should be read in conjunction with the Planning Report which accompanies the planning application.

For the purposes of this EIAR, the various project components are described and assessed using the following references; 'Proposed Project', 'Proposed Wind Farm', 'Proposed Grid Connection Route', and 'Site' as detailed in Section 1.1.1 of the EIAR. A detailed description of the Proposed Project is provided in Chapter 4 of this EIAR.

2.1 Introduction

The proposed wind energy development will encompass 14 no. wind turbines with blade tip height 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, temporary accommodation areas along the turbine delivery route. As set out in Chapter 1 of the EIAR, a single EIAR has been prepared to accompany the planning applications for the Proposed Project.

The Proposed Project comprises the provision of a wind farm which will generate electricity for export onto the national grid. The need to decarbonise and reduce emissions has always been imperative, however, in recent years the urgency involved has become clearer to all stakeholders. The Climate Action Plan (CAP) first published by the Government in 2019, and updated in 2021, 2023, 2024 and 2025 sets out a roadmap to halve emissions by 2030 and reach net zero no later than 2050. Central to this is the set of measures set out to increase the proportion of renewable electricity to up to 80% by 2030 and a target of 9GW from onshore wind. The CAP places front and centre the facts that without urgent action, global warming is likely to be more than 2°C above pre-industrial levels by 2060, with '*devastating*' impacts on nature and '*irreversible changes to many ecosystems*' arising.

Furthermore, the Programme for Government released in January 2025 "*The Government is committed to achieving 80% of Ireland's electricity generation from renewable sources by 2030. To reach this goal, we will establish a clear regulatory pathway, enable network upgrades, improve port facilities, and ensure a dependable schedule of renewable energy auctions. We are focused on ensuring that local communities benefit from Ireland's renewable potential, with job creation, community ownership, and tangible economic returns.*"

The primary driver behind the Proposed Project is the need to provide additional renewable energy to offset the use of fossil fuels within the electricity generating sector. Increasing electricity generation from wind power represents the most economical renewable option to reduce emissions within the power generation sector and is the most mature technology available to achieve national targets that have been established for decarbonisation. The current proposal represents the provision of a significant wind energy proposal and will contribute considerably towards Ireland satisfying its 2030 and 2050 renewable energy targets.

2.1.1 Statement of Authority

MKO has developed extensive expertise and experience over the last 15 years in preparing Background and Planning Policy Context Chapters for a range of projects, including multiple large scale wind energy development.

This chapter was led by Alan Clancy MIPI with support from Ciara Griffin of MKO. Alan Clancy is a Senior Planner with MKO with over 10 years of experience in private practice. Alan holds a BA in Geography & History from University of Galway and a Master's in Planning and Sustainable Development from University College Cork. Alan has experience across a range of sectors including in the commercial, residential, industrial and renewables sectors, Alan's key strengths and areas of expertise are in development management, provision of planning advice, and project management. Since joining MKO, Alan has assisted with various projects including Strategic Infrastructure Developments, lodgement and management of Planning Applications, Development Plan Submissions and preparing Development Potential Reports. Alan is a member of the Irish Planning Institute.

Ciara Griffin is a Planner with MKO. Ciara holds a BA (Hons) in City Planning & Environmental Policy from University College Dublin. Since joining MKO, Ciara has been involved in a range of renewable energy projects including onshore wind and grid infrastructure. Ciara's main responsibilities include preparing planning application documents and reports, preparing inputs for Environmental Impact Assessment Reports and liaising with multidisciplinary team projects.

Sean McCarthy is a Project Director in the Planning Team at MKO with over 10 years of experience in both private practice and local authorities. Sean holds a BSc. (Hons) in Property Studies from ATU and a Masters in Regional & Urban Planning for Heriot Watt University in Edinburgh. Prior to taking up his position with McCarthy Keville O'Sullivan in September 2015, Sean worked as a Planning Officer with the Western Isles Council in Scotland in the UK and prior to that worked as a Graduate Planner with Tipperary County Council. Sean is a chartered member of the Royal Town Planning Institute with extensive experience in residential, commercial, industrial, quarries and healthcare development projects. Sean has been involved in complex and large-scale development projects from inception through to planning permission both as a project manager and working as part of wider design teams. Sean has extensive experience in working on Strategic Housing Development Projects/Large Scale Residential Development Projects and EIAR projects. Within MKO, Sean plays a large role in the management and confidence building of junior members of staff and works as part of a large multi-disciplinary team to produce planning applications.

2.1.2 Renewable Energy Resources

Renewable energy resources are constantly replenished through the cycles of nature, unlike fossil fuels, which are finite resources that are becoming increasingly scarce and expensive to extract. Renewable energy resources offer sustainable alternatives to our dependency on fossil fuels as well as a means of reducing greenhouse gas emissions and opportunities to reduce our reliance on imported fuels.

A gradual shift towards increasing our use of renewable energy is no longer viable. There is an urgency now to ensure real changes happens. Renewable energy development is recognised as a vital component of Ireland's strategy to tackle the challenges of combating climate change and ensuring a secure supply of energy. Ireland is heavily dependent on the importation of fossil fuels to meet its energy need. 70% of energy used in Ireland is imported from abroad, higher than the EU average of almost 60% (National Energy Security Framework 2022). This high dependency on energy imports is highly risky, and Ireland is currently extremely vulnerable both in terms of meeting future energy needs and ensuring price stability. As such, expanding indigenous renewable energy supply is critical for energy security and price stability. The provision of wind turbines will generate renewable energy and provide it for use on the national grid, thus the Proposed Project would aid Ireland in achieving the shift to decarbonising the electricity sector and energy security in Ireland.

2.1.3 Need for the Proposed Project

Ireland's Climate Action Plan 2024 and Climate Action Plan 2025 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, as well as onshore and offshore wind energy development, while continued reliance on fossil fuels threatens national and EU climate commitments.

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 Act requires the rapid expansion of renewable energy, making this a matter of strategic economic and social importance.

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.

The primary driver behind the Proposed Project is the need to provide additional renewable energy to offset the use of fossil fuels within the electricity generating sector. Increasing electricity generation from wind power represents the most economical renewable option to reduce emissions within the power generation sector and is the most mature technology available to achieve national targets that have been established for decarbonisation. The current proposal represents the provision of a significant wind energy proposal, as acknowledged by its classification as a Strategic Infrastructure Development (ACP Case Reference Number PC92.320843) under the Planning and Development Act, 2000 (as amended)) and will contribute considerably towards Ireland satisfying its 2030 and 2050 renewable energy targets.

Please see the accompanying Planning Report and Section 1.5 of Chapter 1 Introduction of this EIAR for further information on the need for the Proposed Project.

2.2 Climate Change Policy and Targets

International and national policy consistently identifies the need to reduce GHG emissions and stresses the importance of reducing global warming. The context of international policy has altered over the last 30-years from being of a warning nature to the current, almost universally accepted belief, that there is a climate change emergency occurring both within Ireland and at a broader global scale. The Intergovernmental Panel on Climate Change (IPCC)'s Sixth Assessment Report[1] published in 2021 provides a stark assessment of global climate change and presents evidence that climate changes will increase in all regions of the globe over the coming decades and that much of the damage caused by climate change up to this point is now likely irreversible, such as the rise in sea levels over the 21st century. 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[2]. 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[3].

"*The Status of Ireland's Climate 2020*" produced by MET Eireann[4], similarly reflects on clear and distinct impacts arising from climate change effects within an Irish context:

[1] *Climate Change 2021 'The Physical Science Basis' (Intergovernmental Panel on Climate Change, August 2021)*
[2] *State of the Global Climate 2024 (World Meteorological Organisation, March 2025)*
[3] *https://wmo.int/news/media-centre/wmo-confirms-2025-was-one-of-warmest-years-record*
[4] *Climate Status Report for Ireland 2020 (Environmental Protection Agency, Marine Institute, Met Éireann, August 2021)*

Greenhouse gas emissions continue to rise:

- Background carbon dioxide (CO2) concentrations reached 414 ppm in 2020 which is approximately a 50% increase compared to pre-industrial levels.
- Methane (CH4) concentrations are at 1940 parts per billion (ppb) - which is approximately a 170% increase compared to pre-industrial levels.
- Nitrous oxide (N2O) concentrations are now above 330 ppb - which is approximately a 20% increase compared to pre-industrial levels.

Annual average amounts of precipitation are increasing:

- 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"*[3], provided 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

[3] *Published 6th January 2026;*

- Rainfall data suggests 2025 was the 15th wettest year since 1941

The IPCC's Sixth Assessment Report does not, however, conclude that a climate catastrophe is inevitable, but rather, there remains a 'narrow path' to determine the future course of climate, mainly by cutting emissions down to net zero. The Proposed Project will contribute to the decarbonisation of the energy sector and reduce harmful emissions. In this regard, it is compliant with national and international climate change policy and targets.

2.2.1 International Climate Policy

United Nations Framework Convention on Climate Change

In 1992, Ireland joined an international treaty, the United Nations Framework Convention on Climate Change (UNFCCC), as a framework for international efforts to combat the challenge posed by climate change. The UNFCCC seeks to limit average global temperature increases and the resulting climate change. In addition, the UNFCCC seeks to cope with impacts that are already inevitable. It recognises that the climate system is a shared resource whose stability can be affected by industrial and other emissions of carbon dioxide and other greenhouse gases. The framework set no binding limits on greenhouse gas emissions for individual countries and contains no enforcement mechanisms. Instead, the framework outlines how specific international treaties (called "protocols" or "Agreements") may be negotiated to set binding limits on greenhouse gases.

Kyoto Protocol

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

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

- New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from 1st January 2013 to 31st December 2020;
- A revised list of greenhouse gases (GHG) to be reported on by Parties in the second commitment period; and
- Amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period.

Under the protocol, countries must meet their targets primarily through national measures, although market-based mechanisms (such as international emissions trading) can also be utilised.

COP21 Paris Agreement

COP21 was the 21st session of the Conference of the Parties (COP) to the UNFCCC. Every year since 1995 (excluding 2020 due to COVID-19), the COP has gathered the 196 Parties (195 countries and the European Union) that have ratified the Convention in a different country, to evaluate its implementation and negotiate new commitments. COP21 was organised by the United Nations and held, in Paris, from 30th November to 12th December 2015. COP21 closed with the adoption of the first international climate agreement (concluded by 195 countries and applicable to all). The 12-page text, made up of a preamble and 29 articles, provides for a limitation of the global average temperature rise to well below 2°C above pre-industrial levels and to limit the increase to 1.5°C. It is flexible and takes into account the needs and capacities of each country. The IPCC's 6th Assessment Report (2021) further collaborates this need to limit any increase in global average temperature to 1.5°C, stating that (underlined for emphasis),

> *"Humanity has emitted 2,560 billion equivalent tons of CO2 since 1750, and we only have a budget of 500 more if we want to limit warming to 1.5°C.*

By following a trajectory of very low GHG emissions (SSP1-1.9), the threshold of 1.5°C will be reached in the short term, between 2021 and 2040, before being very slightly exceeded (1.6°C anticipated over the period 2041-2060) then respected in the long term (1.4°C anticipated over the period 2081-2100).

Everything is not lost, but we must pursue the Paris Agreement's most ambitious goal of limiting warming to 1.5°C."

An article published by the IPCC on the 6th October 2018 titled 'Global Warming of 1.5oC', notes the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways; in the context of mitigation pathways, strengthening of the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty. This special report is part of an invitation contained in the Decision of the 21st Conference of Parties of the United Nations Framework Convention on Climate Change to adopt the Paris Agreement and provides an update on the impact of climate change if emissions are not reduced.

COP25 Madrid

COP25, the 25th session of the COP, was held between the 2nd and 13th of December 2019 in Madrid. The conference was characterised by repeated warnings from civil society (National Government Organisations and corporates) on emerging evidence and scientific consensus on climate change risk. Specifically, it was noted that there is only c. *'10 years left' before the opportunity of limiting global warming to 1.5°C is no longer feasible'.* As such, the only remaining approach to limiting rising global temperatures is a '*7.6% reduction of global GHG emissions every year between 2020 and 2030, and to reach net zero emissions by 2050'.* However, consensus was not achieved between States on finalising the operating rules of the Paris Agreement and to ensure that it became operational by 2020. Despite the lack of consensus on the above challenges, the COP25 did achieve more limited success with regard to the introduction of the "San Jose Principles for High Ambition and Integrity of International Carbon Markets", which sets out the framework on which a robust carbon market should be built. These principles were supported by 23 EU nations, including Ireland, as well as countries in Latin American, 5 no. Pacific Islands and 2 no. countries in the Caribbean.

COP26 Glasgow

COP26 took place in Glasgow, Scotland between the 31st of October and 12th November 2021. The summit was centred around the fact that *"climate change is the greatest risk facing us all."*

The key items COP26 seeks to achieve are:

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

All world leaders at the summit confirmed the need to **urgently** address the gaps in ambition and work together to achieve climate action. The summit highlighted that the Paris Agreement is working, with leaders outlining national targets and efforts to further reduce emissions. There was a clear commitment to working together to achieve climate aims, with significant announcements including:

- *"Over 40 leaders joined the Breakthrough Agenda, a 10-year plan to work together to create green jobs and growth globally, making clean technologies and solutions the most affordable, accessible and attractive option before 2030 – beginning with power, road transport, steel, hydrogen and agriculture.*
- *Over 120 countries covering more than 90% of the world's forests endorsed the Glasgow Leaders' Declaration on Forests & Land Use committing to work collectively to halt and reverse forest loss and land degradation by 2030, backed by the biggest ever commitment of public funds for forest conservation and a global roadmap to make 75% of forest commodity supply chains sustainable.*

- *A Just Energy Transition Partnership was announced to support South Africa's decarbonisation efforts; a powerful example of collaboration between an emerging economy and international partners.*
- *The launch of the Global Methane Pledge saw over 100 countries committing collectively to reduce global methane emissions by 30% by 2030."*

COP27 Sharm el-Sheikh

COP27 took place in Sharm el-Sheikh from the 6th of November 2022 to the 20th of November. The Conference of the Parties (COP) is a supreme decision-making body of the United Nations Framework Convention on Climate Change (UNFCCC). COP 27 centred around three major topics:

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

COP 27 officially ended on the 18th of November, but due to the nature of negotiations an outcome text and the final press conference was not held until November 20th. The first outcomes of the negotiations of the COP 27 agenda were seen in the first draft document. A consolidated final document followed and while it removed much of the vague wording of the draft, it also removed some critical key points, particularly in relation to the strengthening of actions required by developed nations. The most significant outcomes from COP 27 are outlined below:

- **Phase down/out language:** In Glasgow last year, the final agreement was delayed due to the stance if China and India, among others, who were not comfortable the 'phase out' of coal wording in the draft text. This led to the watering down of this commitment to a 'phase down' of coal use. The hope was that COP27 would work to include further language on coal and fossil fuel reduction efforts. However, the wider commitment to phase out all fossil fuels, led by India, and backed by the US and the EU, was taken out and can be marked as the biggest disappointment of COP27.
- **1.5°C Pathway:** The 1.5°C warming limit has been retained and reassurances have been made that there is no room for backsliding. It gives the key political signals that the phase down of all fossil fuels is happening. There has been the setting of a workplan for 2023 to help articulate the nature and components of a global collective goal on adaptation and resilience and how it can be formatted in a way to take into account the Global Stocktake.
- **Climate Finance & Loss and Damage:** There has been the launch of an initiative by the V20 and G7 known as the Global Shield Against Climate Risk (GSACR). The intention of this initiative has been framed almost as an insurance policy backed by the World Bank to prepare and protect those most vulnerable to climate change disasters. The initiative seeks to reform the current climate finance model currently operating in the form of loans, typically with high interest rates and repayment requirements. The beginnings of a framework to compensate for the unequal distribution of harm that has been caused by climate change and the unequal contributions of emissions has also been put in place.

COP28 Dubai

COP28 took place in Dubai, United Arab Emirates and was held from the 30th of November until the 13th December 2023. The Conference recognised the urgent need to reduce GHG emissions and emphasised the importance of mitigating climate change. The agreement reached at the COP provided a significant boost to renewable energy industries and set the stage for countries to prioritise clean and sustainable energy generation. By committing to this transition, the international community took a crucial step towards addressing climate change and creating a more sustainable future. Key actions arising from COP28 include:

- Adoption of enhanced climate commitments and targets by participating countries, aimed at limiting global temperature rise to 1.5 degrees Celsius above pre-industrial levels.

- Development of mechanisms and strategies for implementing these commitments, including the mobilisation of financial resources to support developing nations in their climate mitigation and adaptation efforts.
- Advancing the implementation of the Paris Agreement, with a focus on transparency, accountability, and reporting of progress.
- Accelerating the global transition to clean, renewable energy sources and phasing out fossil fuel subsidies.
- Promoting nature-based solutions and conservation efforts to mitigate climate change and preserve biodiversity.
- Addressing the impacts of climate change, such as adaptation measures for vulnerable communities and sectors.
- Collaborating on international climate finance mechanisms, carbon pricing, and technology transfer to support climate action globally.
- Strengthening international partnerships and cooperation to foster shared responsibility and collective action in addressing climate change.

The final COP28 text includes a pledge whereby signatory countries commit to work together to triple the world's installed renewable energy generation capacity to at least 11,000GW by 2030, taking into consideration different starting points and national circumstances.

COP29 Baku

COP29 took place in Baku, Azerbaijan between the 11th and 22nd of November 2024. There was a central focus on climate financing with agreements being reached on tripling finance to developing countries to help them protect their people and economies from climate-related disasters and also sharing the benefits of the boom in renewable energy. Key actions arising from COP29 include:

- Launch of the COP29 Global Energy Storage and Grids Pledge which commits signatories to a collective goal of deploying 1,500GW of energy storage globally by 2030.
- COP29 Green Energy Pledge: Green Energy Zones and Corridors which promotes the connection of green energy zones and corridors to communities in need through the development of intraregional and interregional interconnected electricity grids.
- Call to action for an equitable and renewable energy transition and increased renewable energy capacity globally.

Progress was also made on carbon markets and how they will operate under the Paris Agreement. Article 6 of the Paris Agreement allows countries to trade carbon credits, which are produced through reducing GHG emissions, to support other countries to meet their climate goals. Country-to-country trading and a carbon crediting mechanism have been made fully operational through agreements at COP29.

COP30 Belém

COP30 took place in Belém, Brazil between the 10th and 21st of November 2025, marking the first UN climate summit hosted within the Amazon region. It was framed as the "Implementation COP", progressing the post-Paris Agreement framework from pledges to delivery after the first Global Stocktake (GST-1). Key actions arising from COP30 include:

- Launch of the 'Global Implementation Accelerator', a voluntary initiative designed to support rapid, high-impact interventions. It creates a structured space for countries to receive technical support, identify barriers, and coordinate investment strategies. Its remit covers a wide spectrum of mitigation and adaptation priority areas, including renewable energy deployment, battery storage, methane reduction, digital grid management, and crucial nature-based interventions.
- Through the Belém Package, Parties committed to accelerating "zero- and low-emission technologies" in hard-to-abate sectors such as industry, transport and power.
- COP 30's redefined Action Agenda included 117 'Plans to Accelerate Solutions' (PAS) across sectors, many of which target low-carbon energy, industrial decarbonization, and clean system deployment.

- COP30 set a long-term ambition to mobilise USD 1.3 trillion annually by 2035 for climate action. This finance is intended to help scale clean energy infrastructure (such as renewables, storage and grid infrastructure), support adaptation, and enable just transitions.

COP30 made strong progress on tools, mechanisms and political momentum for scaling renewable energy, improving efficiency and enabling just transitions. However, the inability to deliver a clear, binding fossil fuel phase-out remains a major barrier to aligning global energy systems with the 1.5°C pathway.

European Green Deal – European Climate Law (2021)

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

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

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

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

The law aims to ensure that all EU policies contribute to this goal and that all sectors of the economy and society play their part. All 27 no. EU Member States have committed to turning the EU into the first climate neutral continent by 2050. One third of the 1.8 trillion-euro investments from the Next Generation EU Recovery Plan, and the EU's seven-year budget, will finance the European Green Deal. On 14th July 2021, the European Commission adopted a set of proposals to make the EU's climate, energy, transport and taxation policies fit for reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels.

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

2.2.1.2 Project Compliance with International Climate Policy

Based on a review of key international climate policy documents, it is clear that the Proposed Project will contribute to reducing dependence on fossil fuels for electricity generation. This shift supports the objectives of the UNFCCC to limit global temperature increases driven by climate change, as well as the goals set out in the Kyoto Protocol and various COP agreements outlined above. By making a just transition to more renewable forms of electricity generation, the level of carbon emissions will drop as our reliance on non- renewable forms of energy lessen.

The Proposed Project is also considered to be in line with the European Green Deal, and European Climate Law, which also aims to reduce carbon emissions and achieve net zero carbon emissions by 2050. These goals will not be met if projects, such as Proposed Project, are not implemented. The construction of this renewable energy development would also aid in ensuring energy security within the EU which is a target of the European Green Deal. As wind is an indigenous and abundant resource, countries can tap into their own wind potential, reducing the vulnerability to price fluctuations and geopolitical risks associated with fossil fuel imports.

2.2.2 National Climate Policy

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 GHG 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.

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

The Climate Action and Low Carbon Development (Amendment) Act 2021, which was signed into law on the 23rd July 2021, legally binds Ireland to achieve net-Zero emissions no later than 2050, and to a **51% reduction in emissions by the end of this decade**. The Act provides the framework for Ireland to meet its international and EU climate commitments and to become a leader in addressing climate change. As indicated by the premise of the legislation, the reduction of emissions is a key proponent of the Climate Action and Low Carbon Development (Amendment) Act 2021 and incorporates the following key provisions:

- Embeds the process of setting binding and ambitious emissions-reductions targets in law;
- Provides for a national climate objective, which commits to pursue and achieve no later than 2050, the transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy;
- Provides that the first two five-year carbon budgets proposed by the Climate Change Advisory Council should equate to a total reduction of 51% over the period to 2030, relative to a baseline of 2018;
- The role of the Climate Change Advisory Council has been strengthened;

- The government must adopt carbon budgets that are consistent with the Paris agreement and other international obligations;
- Actions for each sector will be detailed in the Climate Action Plan which must be updated annually; and
- Local Authorities must prepare individual Climate Action Plans which will include both mitigation and adaptation measures and will be updated every five years.

Under Section 15 of the Climate Act, public bodies are obliged to, in so far as practical, perform their functions in a manner consistent with the latest Climate Action Plan, the National Energy & Climate Plan 2021 – 2030, and other national climate mitigation and adaptation plans. An Coimisiún Pleanála (ACP), 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.

Carbon Budgets

The first national carbon budget programme proposed by the Climate Change Advisory Council, approved by Government and adopted by both Houses of the Oireachtas in April 2022 comprises three successive 5-year carbon budgets[6]. The total emissions allowed under each budget are shown in **Table 2-1** below.

Table 2-1: Proposed Carbon Budgets of the Climate Change Advisory Council

	2021 – 2025 Carbon Budget 1	2026 – 2030 Carbon Budget 2	2031 – 2035 Provisional Carbon Budget 3
	All Gases		
Carbon Budget (Mt CO2eq)	295	200	151
Annual Average Percentage Change in Emissions	-4.8%	-8.3%	-3.5%
The figures are consistent with emissions in 2018 of 68.3 Mt CO2eq reducing to 33.5 Mt CO2eq in 2030, thus allowing compliance with the 51% emissions reduction target by 2030.			

Section 6C of the Climate Act provides that the Minister shall prepare, within the limits of the carbon budget, the Sectoral Emissions Ceilings. These ceilings set out the maximum amount of GHG emissions that are permitted in each sector. The Government approved Sectoral Emissions Ceilings on 28th July 2022. The electricity sector is allocated a sectoral ceiling of 40 $MtCO_2eq$ for the first budget (2021-2025) and a sectoral ceiling of 20 $MtCO_2eq$ for the second budget period (2026-2030). In 2024, electricity sector emissions were reported to be 6.3 $MtCO_2eq$[7].

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

[7] *Climate Change Advisory Council Annual Review 2025 (April, 2025) https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR2025-Electricity-FINAL.pdf*

The Environmental Protection Agency (EPA) reported in May 2025[8] that the first two carbon budgets (2021-2030) – which aim to support the achievement of the 51% emissions reduction target - would not be met. In regard to the first carbon budget it is projected that it will be exceeded by 12 Mt CO_2eq in the 'With Existing Measures (WEM)' scenario and by 8 Mt CO_2eq in the 'With Additional Measures (WAM)' scenario. Section 6D – paragraph 5 – of the Climate Act states that non-achievement of the first carbon budget would see the excess emissions carried forward into the second budget period and the second carbon budget would be reduced by that amount. If this occurs this would make achievement of the second budget substantially more difficult. Taking into account the projected excess from the first carbon budget, it is projected that the second carbon budget will be exceeded by 114 MtCO_2eq in the WEM scenario and 77 MtCO_2eq in the WAM. As a result of this, it is stated that *"far higher emissions cuts will be needed to comply with Budget period 3 and subsequent carbon budgets".*

According to the EPA, Ireland is not on track to meet the targets for the first and second carbon budget periods, as set out by the CCAC. As such, it is imperative that projects such as the Proposed Project are consented as they have the potential to decrease carbon emissions through the provisions of renewable electricity to the national grid, thus decreasing the country's reliance on carbon-emitting fossil fuels.

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

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

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

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

Climate Action Plan 2023

The Climate Action Plan 2023 ('CAP23') was published in December 2022 by the Department of the Environment, Climate and Communications. This outlines the actions required up to 2035 and beyond to meet Ireland's commitment to becoming carbon neutral by 2050. CAP23 sets out a roadmap to deliver on Irelands climate ambition and is aligned to ensure that Ireland achieves its legally binding target (the Climate Act) of net-zero GHG emissions no later than 2050.

A target aims for a reduction in emissions of 51% over the period 2018 to 2030 and in doing so, prevent/ mitigate the potentially devastating consequences of climate change on Ireland's environment, society, economy and natural resources. CAP23 states that to do so, Ireland must harness the untapped indigenous renewable resources and has a target of achieving 80% of energy being produced from renewable sources by 2030 (unchanged from the previous Climate Action Plan, 2022) with a target of 9GW of that being produced by onshore wind. Measures set out in CAP23 to achieve these targets include to *'accelerate and increase the deployment of renewable energy to replace fossil fuels'* (Section 12.1.4 of CAP23). It is clear from the message and ambition of CAP23 that the drive to deploy renewable energy projects such as the Proposed Project in Ireland are critical to achieving the aims and objectives of CAP23 including the 9GW of onshore wind energy by 2030 and carbon neutrality by 2050.

[8] *Ireland's Greenhouse Gas Emissions Projections 2023-2050, EPA, May 2025*

> *"Achieving these ambitions will require a coordinated effort across Ireland and every economic sector will be involved. It requires no less than a national transformation over the coming years in how we work, travel, heat out homes, source our energy and use our land".*

Decarbonisation of the electricity sector is, as noted in CAP23, key to the decarbonisation of other sectors who will depend on electrification including transport, heating and industry. The increase in the portion of renewable electricity of 80% by 2023 will come in part from a targeted 9GW of onshore wind. CAP23 notes:

> *"Achieving further emissions reductions between now and 2030 requires a major step up in how we accelerate and increase the deployment of renewable energy to replace fossil fuels, deliver a flexible system to support renewables, and manage electricity demand".*

Chapter 12 of CAP23 sets out the state of play, targets and actions for the decarbonisation of the electricity sector. Carbon emissions from electricity have fallen by 45% between 2005 and 2020, falling by 19% between 2005-2012 and by 33% between 2012 and 2020. This trend is largely due to the availability of renewable energy generated electricity (a sixfold increase between 2005 and 2020) and an associated reduction in the use of carbon heavy fuels such as peat and coal.

Due to the scale of the challenge, and the recognition of central role of the electricity sector in achieving sector wide targets, the electricity sector has been allocated the smallest carbon budget and will require the steepest carbon emissions decline of all sectors – namely a reduction in carbon emission by -75% relative to 2018 baseline. Carbon budgets 1 and 2 allow for 40.02 $MtCO_2eq$ from the electricity sector up to 2025 and 20 $MtCO_2eq$ from 2026-2030. This means an average of 8 $MtCO_2eq$ per annum. Emissions for the period 2021 were 9.98 $MtCO_2eq$, which is in exceedance of 8 $MtCO_2eq$, which means that to keep on track, electricity will now have to achieve annual emissions of c. 7.5 $MtCO_2eq$ from 2022 to 2025. The measures set out for electricity sector include *inter alia:*

- Reduce annual CO_2eq. emissions from the sector to 3 $MtCO_2eq$ by 2031 (75% reduction compared to 2018);
- Accelerate and increase the deployment of renewable energy to replace fossil fuels;
- Accelerate the delivery of onshore wind, offshore wind and solar through a competitive framework to reach 80% of electricity demand from renewable energy by 2030;
- Target 6 GW of onshore wind and up to 5 GW of solar by 2025;
- Target 9 GW onshore wind, 8 GW Solar and at least 5 GW of offshore wind by 2030;
- Align the relevant constituent elements of the planning and permitting system to support accelerated renewable energy development, supported by national policy and associated methodologies to inform regional and local planning policies, noting that county development plans are obliged to set out objectives to facilitate energy infrastructure.

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

Climate Action Plan 2024

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

CAP 24 includes the latest trends in the electricity sector:

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

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

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

The scale of the challenge is apparent when quantified:

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

CAP 24 identifies the alignment of local and national policy as critical to accelerate renewable energy rollout.

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

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

Climate Action Plan 2025

The Climate Action Plan 2025 ('CAP 25') is the third Climate Action Plan to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021. 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. It is supported and built upon by several key national policy plans, including Project Ireland 2040, the National Planning Framework and the National Adaptation Framework.

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

2.2.2.2 Project Compliance with National Climate Policy

The Proposed Project aligns with national climate policy objectives by making a significant contribution to achieving the CAP25 target of 9GW of onshore wind energy by the year 2030. Furthermore, the Proposed Project will aid Ireland in adhering to, or limiting the exceedance of, the country's carbon budgets. As Ireland is not on track to meet the targets for the first and second carbon budget periods, it is imperative that carbon emissions are reduced. Currently, the electricity sector is rapidly approaching the designated sectoral ceiling of 40 MtCO2eq for the first carbon budget period from 2020 to 2025. The national renewable energy targets and the carbon budgets are integral to the government's response to the climate crisis.

2.3 Renewable Energy Policy and Targets

This section of the EIAR provides a breakdown of international and national renewable energy policy with regards to the Proposed Project. Under this section, the following are discussed:

- EU Renewable Energy Policy;
- National Renewable Energy Policy;

National policy has developed in line with European and International policies, targets and commitments, in that the importance and urgency of decarbonising the energy generation sector, the economy in general and reducing greenhouse gas emissions has become increasingly more apparent.

The Proposed Project complies with the nationally stated need to provide a greater amount of renewable energy onto the national grid and will further reduce the national reliance on fossil fuels for electricity generation.

2.3.1 EU Renewable Energy Policy

Renewable Energy Directive

The Renewable Energy Directive ('RED') is the EU legal framework for the development of renewable energy across all sectors of the EU economy, supporting clean energy cooperation across EU countries. Since the introduction of the RED in 2009, it has undergone several revisions, the most recent of which occurred in November 2023. Since its adoption in 2009, the share of renewable energy sources in energy consumption has increased from 12.5% in 2010 to 23% in 2022[10]. Of the 27 EU member states the lowest proportions of renewables were recorded in Ireland (13.1%). Crucially, the RED sets the overall target for renewable energy in the EU.

RED I – 2009

Renewable Energy Directive 2009 (RED I - the original RED) (2009/28/EC), adopted in 2009, set binding targets for EU member states to achieve a 20% share of renewable energy in final energy consumption by 2020. It established a framework for national renewable energy action plans, sustainability criteria for biofuels and bioliquids, and a system of guarantees of origin for renewable energy.

RED II – 2018

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

RED III – 2023

In November 2023, a revision of the Renewable Energy Directive[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 42.5%, with an ambition to reach 45% by 2030. The increase was proposed under the publication of REPowerEU plan in May 2022. The Directive also introduces specific targets for Member States in the industry, transport, and building (district heating and cooling) sectors.

Under RED III, EU member states must identify areas for the acceleration of renewables where projects will undergo a simplified and fast-track procedure. The deployment of renewables will also be of "*overriding public interest*" 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.**

Energy Roadmap 2050

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

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

The analysis found that decarbonising the energy system is technically and economically feasible. The Roadmap notes that all scenarios show the biggest share of energy supply technologies in 2050 comes from renewables. In this regard, it should be noted that the Climate Change Advisory Council states within their 2020 Annual Review (September 2020) that, "*while the share of renewable electricity generation, particularly wind, is increasing [in Ireland], the [overall] pace of decarbonisation of the [electricity generation] sector needs to accelerate*", as it is not compatible with a low-carbon transition to 2050. As such, a major prerequisite for a more sustainable and secure energy system is a higher share of renewable energy up to and beyond 2030 to 2050. Each of the scenarios assumes in the analysis that increasing the share of renewable energy and using energy more efficiently are crucial, irrespective of the particular energy mix chosen.

The Climate and Energy Framework

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

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

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

The proposal implements EU commitments under the Paris Agreement on climate change (COP21), discussed above in **Section 2.2.1**, and marks an important milestone in the allocation to Member States of a package of climate targets formally adopted as part of the 2030 Climate and Energy Framework.

European Green Deal

The European Green Deal, further detailed in Section 2.2.1 above, was launched in December 2019 and proposes to increase the binding target of renewable sources in the EU's energy mix from 32% to 40% by 2030 via amendments to the RED as per the 'Fit for 55' package (July 2021)[9]. The European Green Deal recognises that 75% of the EUs GHG emissions stems from the production and use of energy, hence emphasising the need to decarbonise the EU's energy system. The deal identifies three key principles to support a clean energy transition:

1. *Ensuring a secure and affordable EU energy supply.*
2. *Developing a fully integrated, interconnected, and digitalised EU energy market.*
3. *Prioritising energy efficiency, improving the energy performance of our buildings and developing a power sector based largely on renewable sources*[10]*.*

REPowerEU

REPowerEU was launched in May 2022 by the European Commission, proposes an outline of a plan to make Europe independent from Russian fossil fuels, starting with gas, due to the high and volatile energy prices, and security of supply concerns following Russia's unprecedented military attack on Ukraine. Currently, the EU imports 90% of its gas consumption, with Russia providing around 45% of those inputs. Russia also accounts for around 25% of oil and 45% of coal imports. Phasing out dependence on fossil fuels can be done well before 2030, increasing the resilience of the EU-wide energy system based on two pillars:

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

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

> *'Speeding up renewables permitting to minimise the time for roll-out of renewable projects and grid infrastructure improvements'.*

In September 2023, the European Parliament agreed to update the RED. The updates including raising the share of renewables in the EU's final energy consumption to 42.5% by 2030 with Member States encouraged to achieve 45% and a more efficient approval procedure for deploying renewables in Europe. In addition, as a part of the REPowerEU Plan, the European Commission has proposed a series of additional targeted amendments to the renewable energy directive to reflect the ongoing changes in the energy landscape and the continued invasion of Ukraine. This will make the sector more efficient and reach the set goals faster.

In addition, the REPowerEU Plan highlights the overriding public interest in achieving renewable energy targets. The REPowerEU Plan states that: *"the revised proposal operationalises the principle of* ***renewable energy as an overriding public interest****, introduces the designation of* ***'go-to' areas*** *and other ways to shorten and simplify permitting while also minimising potential risks and negative impacts on the environment."* This highlights the importance of public interest and incentive to achieve the renewable

[9] https://www.consilium.europa.eu/en/policies/eu-plan-for-a-green-transition/
[10] https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/energy-and-green-deal_en

energy target, highlighting the importance of appropriate designation of sufficient areas for wind energy development by local authorities within the EU.

2.3.1.2 Project Compliance with EU Policy

The Proposed Project is fully aligned with, and supported by, relevant EU energy and climate policy. It will contribute to the objectives of the 2030 Climate and Energy Framework, including the EU-wide binding targets of achieving at least 27% renewable energy and 27% energy efficiency by 2030. Additionally, the Proposed Project supports the increased ambition to raise the share of renewables in the EU's energy mix from 32% to a minimum of 42.5% by 2030.

The EU Energy Roadmap 2050, which outlines pathways to meet long-term climate and energy goals, highlights that all projected scenarios foresee renewables as the dominant source of energy supply by 2050. As such, the Proposed Project aligns with this long-term vision.

The RePowerEU plan, which aims to enhance energy security and accelerate the integration of renewables into the EU grid, explicitly calls for faster permitting processes for renewable projects and improvements to grid infrastructure. The Proposed Project directly supports these objectives and is therefore considered to be strongly underpinned by current EU energy policy.

The EU Energy Roadmap 2050 and the RePowerEU Plan are applicable to the current planning application and EIAR, and they provide further justification for granting consent for the Proposed Project.

2.3.2 National Renewable Energy Policy

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

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

Following an extensive consultation process, the Government published the White Paper '*Ireland's Transition to a Low Carbon Energy Future 2015–2030'* in December 2015. This document, produced by the then Department of Communications, Energy and Natural Resources (DCENR), provides an updated energy policy framework to guide Ireland's transition to a low-carbon energy system through 2030 and towards 2050. It outlines the Energy Vision 2050, which targets an 80–95% reduction in energy sector GHG emissions (compared to 1990 levels), primarily through increased renewable electricity generation and greater use of electricity and bioenergy in heating and transport.

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

The White Paper highlights onshore wind as Ireland's leading and most cost-effective renewable resource, noting its high efficiency and lower support costs due to the country's strong wind profile. It also recognises the growing competitiveness of solar technology and its potential to enhance energy security, meet renewable targets, and stimulate economic growth.

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

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

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

National Energy Security Framework

More recently, the National Energy Security Framework (DECC, April 2022) highlights clearly the impacts the Russian invasion of Ukraine and the resulting war has had on Europe's energy system. The resulting decision by the European Union to phase out the import of Russian gas, oil and coal has brought to the fore the importance of security of supply and how energy policy is designed for long-term resilience. It takes account of the need to decarbonise society and economy, to reduce Ireland's emissions by 51% over the decade to 2030 and reach net zero emissions by 2050. According to the SEAI's Energy in Ireland (2024) report, oil accounts for 48.9% of Ireland's primary energy requirement making it one of the highest rate of oil dependency in the EU. The International Energy Agency, of

which Ireland is a member country, includes a 10-point plan to cut oil use which calls for an acceleration in the deployment of wind and solar projects. Ireland's response per the Framework is set out over three themes:

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

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

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

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

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

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

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

National Energy and Climate Plan (NECP) 2021 – 2030

Ireland's National Energy and Climate Plan (2021-2030) was produced in July 2024, as a national framework on a ten-year rolling basis, stating EU Member States' climate and energy objectives, targets, policies and measures to the European Commission. The NECP brings together policies, targets, tools and associated material from across different government bodies, streamlining into 1 document, in accordance with European Union Directives. The 5 main dimensions included within this policy document provide a general overview of policies and measures involving energy and climate in Ireland:

1. *Decarbonisation*
2. *Energy Efficiency*
3. *Energy Security*
4. *Internal Energy Market*
5. *Research, Innovation and Competitiveness*

These dimensions mirror ambitions included within Ireland's most recent CAP25, and includes projections for the future, based off current performance, helping to identify gaps and areas that Ireland can improve on, which is reflected in the annual update of Ireland's Climate Action Plan.

Energy Security in Ireland to 2030 – Energy Security Package

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

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

Independent research undertaken as part of the package, McCarthy Report[11], provides an analysis of developments in the electricity sector in Ireland. The McCarthy Report makes the following observation in relation to the consenting process:

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

A key finding from the technical analysis conducted as part of the energy security package is the interdependence of energy security on two essential pillars*: 'harnessing our indigenous renewable energy resources at speed and at scale and the rapid electrification of energy demand'*. As such, the energy security package provides additional measures to supplement the existing measures introduced under previously published government policy documents. The additional measures most relevant to the Proposed Project is Action 10 which is "*To implement Planning and Consenting System Reforms and provide greater certainty to the sector."*

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

The Proposed Project will directly support the government's goal of enhancing national energy security by acting as a domestic source of renewable electricity. By supplying clean energy to the national grid, it will contribute to the transition toward a renewables-driven energy system.

2.3.2.2 Project Compliance with National Renewable Energy Policy

The National Energy Security Framework outlines several steps to accelerate Ireland's shift to renewable energy initiatives. It is evident that the Proposed Project aligns with this framework by increasing the proportion of renewable energy on the national grid, thus expediting Ireland's transition to a low-carbon energy future.

[11] https://www.gov.ie/pdf/?file=https://assets.gov.ie/276441/eb496c01-5c01-4594-af09-74342b4ac971.pdf#page=null

2.4 Climate and Renewable Energy Target Progress

At a European level, the latest data shows that, as of 2023, 24.5% of energy consumed in the EU came from renewable energy sources[12]. This represents an increase of 1.5% compared to 2022 levels. While progress is being made to increase the share of renewable energy, it is clear that all EU member states need to intensify their efforts to collectively comply with the target of 42.5% set in the latest revision of the renewable energy directive.

Of the 27 EU member states, Ireland had one of the lowest proportions of renewable energy at 15.3% in 2023[13]. It is evident that Ireland is not performing well when compared against our European counterparts and that urgent action is required to increase the overall share of renewable energy in our gross final energy consumption. When it comes to the share of renewable energy in electricity, Ireland does perform better generating 36.8% in 2022, but still below the EU average of 41.1%[14].

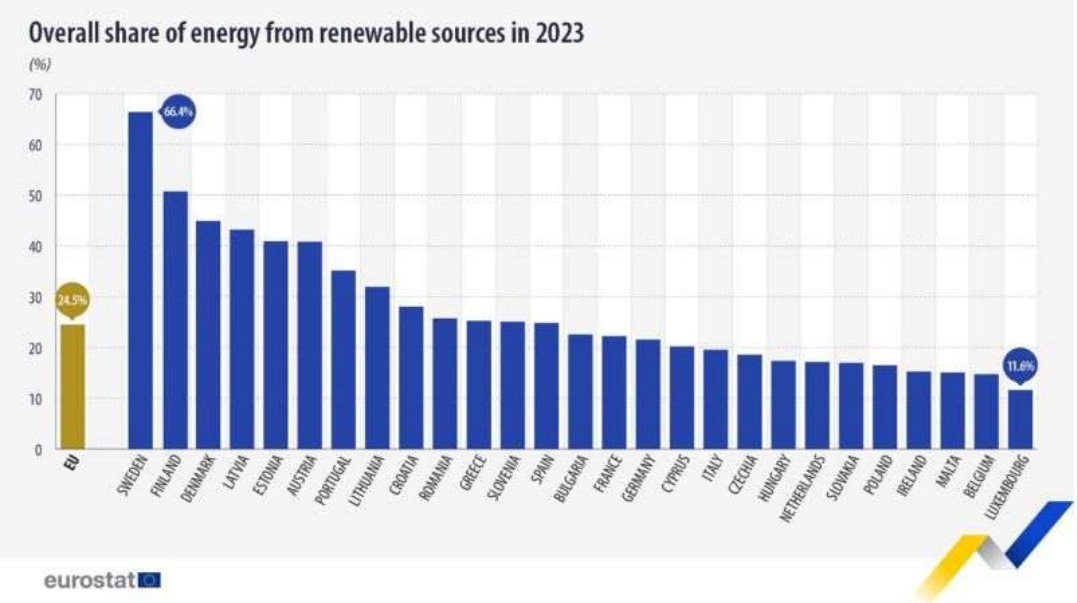


Figure 2-1: Overall share of energy from renewable sources (source: Eurostat)

Ireland's Greenhouse Gas Emissions Projections

In May 2024, the Environmental Protection Agency (EPA) published *Ireland's Greenhouse Gas Emissions Projections 2023–2050*, outlining progress towards national and EU climate targets. The report produced two scenarios: *With Existing Measures* (WEM), based on policies in place up to 2022, and *With Additional Measures* (WAM), which included further planned actions such as those in the Climate Action Plan 2024 (CAP24). Despite the inclusion of these additional measures, Ireland was projected to exceed both carbon budgets for 2021–2030 by a wide margin, miss the 51% emissions reduction target (compared to 2018), and fall short of sectoral emissions ceilings across most sectors. The WAM scenario also indicated that Ireland would not meet its 42% EU ESR emissions reduction target by 2030, even when accounting for flexibilities. Notably, the Energy Industries sector was projected to see significant emissions reductions, driven by the expansion of wind and other renewable electricity generation.

In May 2025, the EPA published an updated report on Ireland's Greenhouse Gas Emission Projections, titled 'Ireland's Greenhouse Gas Emissions Projections 2024–2055', which reaffirmed and further emphasised the previous 2023-2050 trends.

[12] https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Renewable_energy_statistics
[13] https://ec.europa.eu/eurostat/databrowser/view/nrg_ind_ren/default/table?lang=en
[14] https://ec.europa.eu/eurostat/databrowser/view/nrg_ind_ren__custom_9264705/default/bar?lang=en

The main findings of the report are the following:

- *Ireland is not on track to meet the 51 per cent emissions reduction target (by 2030 compared to 2018) which include many 2024 Climate Action Plan measures. Greenhouse gas emissions are projected to be 9 to 23 per cent lower by 2030 (compared to 2018) which places Ireland further from the 2030 national climate target compared to previous assessments.*
- *Budget period 1 (2021-2025) of 295 Mt CO2eq is projected to be exceeded by between 8 to 12 Mt CO2eq. Budget period 2 (2026-2030) of 200 Mt CO2eq is also expected to be exceeded by a significant margin of 77 to 114 Mt CO2eq (with carryover from Budget period 1).*
- *Sectoral emissions ceilings for 2030 are projected to be exceeded by the Buildings, Electricity, Industry and Transport sectors;*
- *Ireland is not projected to meet its EU target, set under the Effort Sharing Regulation, of a 42 per cent emissions reduction by 2030 (compared to 2005) even with flexibilities applied. This assessment shows that greenhouse gas emissions will be reduced by 10 to 22 per cent by 2030 (compared to 2005) without the use of flexibilities and by 13 to 26 per cent with the use of flexibilities.*
- *Additional measures and accelerated implementation of existing measures is necessary to meet both National and EU targets. Projected gaps to National and EU 2030 targets reported this year are larger than last year due to more conservative delivery of measures and associated estimates of emission reductions by 2030.*
- *From 10.6 Mt CO2eq in 2018, emissions from the Energy Industries sector are projected to decrease to between 3.4 and 4.4 Mt CO2eq in 2030 (a 59 to 68 per cent reduction). Renewable energy generation at the end of the decade is projected to range from 60 to 68 per cent of electricity generation.*

It is stated in the report that the target of 80% share renewable electricity (RES-E) is not projected to be reached. In addition to this, the CAP24 target of 9GW of onshore wind, is projected to fall short in the WAM scenario, with a predicted 7.1MW delivered.

National Energy Projections (November 2024)

The National Energy Projections report, published by the SEAI in September 2025, sets out the most recent updates to Ireland's progress towards its binding European and National renewable energy targets.

In 2023 RED II set an EU wide target for overall RES of 32% RES in 2030. Member states set their national contributions to the EU-wide target, with Ireland setting its at 34.1% in 2030. RED III increased the binding EU-wide target for overall RES to at least 42.5% with Ireland subsequently increasing the target to 43% in 2030.

The decarbonisation of the electricity generation is critical considering the need to electrify other sectors such as heating and transport in order to achieve the sectoral decarbonisation targets. By 2030, renewable energy sources are anticipated to dominate electricity generation, particularly experiencing a significant surge later in the decade attributed to the integration of substantial offshore wind projects.

The most notable conclusion drawn from the Report is the significant gap between projections across both the WEM and WAM scenarios and the legally binding national and EU emission reductions targets. The Report states that even with full implementation of CAP24, Ireland is projected to face significant gap in meeting many legally binding energy and climate obligations, including national carbon budgets and sectoral emissions ceilings, and EU obligations on renewable energy, energy efficiency and greenhouse gas emissions.

The SEAI projections explore the risk scenarios WEM and WAM, the aim being to address the gap between current policy trajectories and the most ambitious planned policies scenarios. The SEAI WEM and WAM scenario modelling considers the latest CAP published at the time of policy assumptions for the modelling scenarios (CAP24).

The Report projects GHG emissions under the WEM and WAM scenarios. In the WEM scenario, total greenhouse gas emissions are expected to exceed the carbon budgets for CB1, CB2 and provisional CB3

in 2025, 2029 and 2031, respectively, with a cumulative exceedance of 23% by the end of 2030. In the WAM scenario, cumulative exceedance of 16% is projected by the end of 2030. The projected overall carbon budgets exceedance has reduced from the 2024 projections, though there are still significant risks that this could increase again subject to market changes and the pace of implementation of policy.

Energy in Ireland (December 2025)

In December 2025, the Sustainable Energy Authority of Ireland (SEAI) released an annual publication '*Energy in Ireland'* report which looks at trends in national energy use and at the underlying driving forces, such as the economy and weather, and more recently the impacts of high energy prices. It also examines GHG emissions from energy use, energy security, cost competitiveness, and Ireland's progress towards EU renewable energy targets.

The Report identifies that Ireland's national energy-related emissions in 2024 were at their lowest level in over 30 years. Energy-related emissions in 2024 were 30.9MtCO$_2$eq, down 1.5% on 2023 levels. Energy-related emissions were 6.9MtCO$_2$eq in 2024 the lowest on record, down 8.3% from 2023 levels-. The following are some of the key points, relating to renewable energy and energy emissions:

- 14.6% of Ireland's primary energy was renewable in 2024, the highest value to date.
- Ireland used 1.31 TWh more renewable energy in 2024 than in 2023.
- Ireland's RES-Overall result is now above its 2020 16% baseline target, with a 2030 target of 43%.
- Ireland's 2024 RES-Electricity result was 41.3%, up from 40.4% in 2023 – the highest value to date.
- Wind accounted for 4.59 MtCO2eq or 62.2% of the total avoided GHG emissions in 2024.

Ireland's installed wind capacity in 2024 was 4.94 GW, which indicates a 4.3% increase from the previous year. Ireland's 2025 CAP target for installed wind capacity is 6 GW, and its 2030 CAP targets for onshore and offshore capacity are 9 GW and 5 GW, respectively. SEAI's projections under the WAM scenario indicate a total installed capacity of 9.8 GW by the end of 2030. This WAM scenario is the most optimistic reporting scenario modelled, achieving 68% RES-E by 2030.

The Report states that over the last 10-years, Ireland has added wind capacity at an average rate of 0.27 GW per annum, although this has dropped to a rate of 0.16 GW over the last 5-years. To align to the pace of the WAM projections needed to deliver on the 80% RES-E target, the rollout of onshore wind capacity needs to return to the rate previously achieved between 2016 and 2019.

Figure 1.25 of the Report, copied below, illustrates the year-on-year increase in installed wind capacity required to align the pace of the WAM.

Figure 1.25: Year-to-year increases in installed wind capacity to 2024, and year-to-year increases in WAM capacity projections of capacity from 2025 to 2030

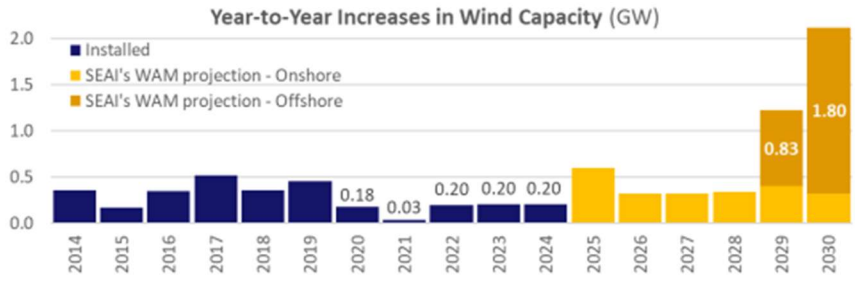


Figure 2-2: Ireland's year-to-year increases in installed wind capacity required to align the pace of the WAM

The Report also identifies a plateauing of wind generation, which is the largest contributor to renewable electricity, over the last 5 years. For four of the last five years, Ireland's wind generation has varied between 11.40 TWh and 11.87 TWh, which is only a ±2% variation. In contrast, wind generation in the preceding 5 years (2016 to 2020) showed an average annual increase of over 20%.

The Climate Change Advisory Council Annual Review 2025

The Climate Change Advisory Council (CCAC) open their 'Annual Review 2025 - Summary for All' quite starkly,

> *"1. Ireland remains substantially off track in meeting its EU and national emissions reduction targets, with progress in the Agriculture and Transport sectors, which collectively account for approximately 55% of Irish emissions, proving particularly slow. The Government is urged to move from ambitious statements to implementing impactful and demonstrable actions that build momentum and public buy-in.*
>
> *2. Failure to meet targets will potentially result in substantial compliance costs, estimated to be in the range of €8–26 billion, and a colossal missed opportunity to invest in Irish households, communities and businesses – creating jobs, improving health and wellbeing, and protecting the most vulnerable in society."*

In addition, the standout recommendation from the CCAC is that "*The delay in transposing EU directives into law, particularly in relation to energy, is concerning given the urgent need to transition to a low-carbon energy system. The Council urges the Government to ensure full transposition of all climate- and energy related directives into law in advance of Ireland's presidency of the Council of the European Union in July 2026."*

The Climate Change Advisory Council Annual Review 2025 – Electricity

The CCAC published its annual review in April 2025 where it outlines detailed observations and recommendations for the Electricity sector in Ireland. This review emphasises the urgent need for Ireland to accelerate its transition to renewable energy to meet its 2030 electricity capacity targets and adhere to sectoral emissions ceilings. The CCAC states:

> *"To meet the carbon budgets, emissions from the Electricity sector will need to reach zero by the end of the 2030s. In 2024, electricity emissions fell by approximately 7% relative to 2023, reaching the lowest level since record-keeping began in 1990. This was driven by a continued decline in the use of coal for electricity generation, coupled with a notable rise in imported electricity for the second consecutive year. Renewable energy is still not being rolled out fast enough, and insufficient investment in the electricity grid means that some of the renewable energy we currently generate cannot be used. Emissions are currently projected to exceed the sectoral emissions ceiling, even in the most optimistic scenario."*

Key observations in relation to Renewable Electricity are outlined below:

- In 2024, 1.6 GW of onshore wind (0.7 GW) and solar (0.9 GW) projects received planning permission, but only 0.5 GW (0.2 GW wind, 0.3 GW solar) were connected, which is well below the 1.8 GW annual target needed to achieve 2030 targets.
- Grid constraints led to 1,266 GWh (10.1% of the total available wind energy) of wind and energy being curtailed.
- During 2024, an additional 0.5 GW (0.2 GW wind and 0.3 GW solar) of new utility-scale renewable capacity was connected, representing a decrease compared with the 0.6 GW connected in 2023 and significantly below the 1.8 GW annual average increase in capacity that is required to meet 2030 targets.

Ireland's Climate Change Assessment (January 2024)

In January 2024, the EPA published Irelands Climate Change Assessment (ICCA). This assessment provides a comprehensive overview and breakdown of the state of knowledge around key aspects of climate change with a focus on Ireland. The ICCA report is presented in four volumes.

- Volume 1: Climate Science – Ireland in a Changing World
- Volume 2: Achieving Climate Neutrality in 2050
- Volume 3: Being Prepared for Irelands Future

- Volume 4: Realising the Benefits of Transition and Transformation

The ICCA Synthesis Report states that having peaked in 2001, Irelands GHG emissions have reduced in all sectors except agriculture. However, Ireland currently emits more GHGs per person than the EU average. The ICCA Synthesis Report goes on to state that there has been an identified gap in policy that indicates that Ireland will not meet its statutory GHG emission targets. Achieving net zero carbon dioxide emissions by 2050 requires significant and unprecedented changes to Ireland's energy system. Policies tailored to suit different stages of technology development are critical for achieving a net zero energy system. Established technologies, such as wind energy, solar photovoltaics and bioenergy will be key in meeting short-term emission reduction targets (i.e. 2030), whereas offshore wind infrastructure is expected to be the backbone of future energy systems. This can only be achieved with appropriate support schemes, regulation and investments for synergistic growth of offshore wind and other renewable technologies.

In relation to Ireland's target of achieving net zero carbon dioxide emissions by 2050 and the role renewable energy will contribute to this; the ICCA Synthesis Report states the following:

> *"There are well-established 'no-regret options' that need to happen now, which can get us most of the way to net zero carbon dioxide emissions. Beyond that, there are 'future energy choices' relating to the scale and magnitude of technologies that will help get us all the way. Ireland's no-regret options are demand reduction (e.g. through energy efficiency and reduced consumption), electrification (e.g. electric vehicles and heat pumps), deployment of market-ready renewables (e.g. wind energy and solar photovoltaics) and low-carbon heating options (e.g. district heating), while our future choices include hydrogen, carbon capture and storage, nuclear energy and electro fuels. Renewable energy can increasingly provide our future energy needs but will need to be complemented with carbon dioxide removals to achieve a net zero energy system in hard-to-abate sectors"*

2.5 Planning Policy Context

2.5.1 Introduction

This section of the EIAR provides the strategic planning context of the Proposed Project. As is examined below, the Proposed Project is in line with national, regional and local policies, frameworks, guidelines and plans. This section has been broken down to the following sections:

- National Policy Context
- Regional Policy Context
- Local Policy Context
- Other Relevant Material Considerations

As a renewable energy project, the Proposed Project is consistent with the overall national policy objectives to increase penetration and deployment of renewable energy resources and has been designed in the context of the relevant wind energy and other guidelines. The specific compliance with the National, Regional and Local/County Development Plan provisions is dealt with in detail in the sections below.

2.5.2 National Planning Policy

The Planning and Development Act 2024

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

The Government has approved an Implementation Plan for the Planning and Development Act 2024, which sets out the schedule for its phased commencement. The Implementation Plan also outlines a series of initiatives aimed at supporting training and stakeholder engagement across the planning sector to ensure a smooth transition to the new legislative framework. Concurrently, work is ongoing to revise and update the supporting Regulations that will underpin the operation of the new Act.

National Planning Framework: Project Ireland 2040

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

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

The NPF notes that the population of Ireland is projected to be roughly 5.7 million by 2040. This population growth will place further demand on both the built and natural environment. In order to

strengthen and facilitate more environmentally focused planning at the local level, the NPF states that future planning and development will need to:

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

A key focus throughout the NPF is the fostering of a transition toward a low carbon, climate-resilient society. In this regard, one of the stated key elements of the NPF is an Ireland which has a secure and sustainable renewable energy supply and facilitates the ability to diversify and adapt to new energy technologies. Key features identified in the NPF to facilitate the transition towards a low carbon energy future include:

- A shift from predominantly fossil fuels to predominantly renewable energy sources.
- Increasing efficiency and upgrades to appliances, buildings and systems.
- Decisions around development and deployment of new technologies relating to areas such as wind, smart grids, electric vehicles, buildings, ocean energy and bio energy.
- Legal and regulatory frameworks to meet demands and challenges in transitioning to a low carbon society.

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

The following National Policy Objectives (NPO) are applicable to the Proposed Project.

- **NPO 21:** Enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services, including ICT-based industries and those addressing climate change and sustainability.
- **NPO 54:** Reduce Ireland's carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.

Also relevant to the Proposed Project, Ireland's national energy policy under **Objective 55** aims to *'promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050'*. The NPF aims to ensure that decisions that are made today meet our future needs in a sustainable manner.

An overarching objective of the NPF is to foster a transition toward a low carbon, climate-resilient society, which reflects the policy ethos established at the European level of governance (e.g. climate change and renewable energy targets). In this regard, one of the key themes of the NPF is the realisation of an Ireland which has a secure and sustainable renewable energy supply and the ability to diversify and adapt to new energy technologies. The NPF references the national Climate Policy Position which established the fundamental objective of achieving transition to a competitive, low carbon, climate resilient and environmentally sustainable economy by 2050. The NPF emphasises that rural areas have a strong role to play in securing a sustainable renewable energy supply for the country and acknowledges that *"rural areas have significantly contributed to the energy needs of the country and continue to do so"*. In this regard, the NPF states:

> *"In meeting the challenge of transitioning to a low carbon economy, the location of future national renewable energy generation will, for the most part, need to be accommodated on large tracts of land that are located in a rural setting, while also continuing to protect the integrity of the environment".*

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

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

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. In order to strengthen and facilitate more environmentally focused planning at the local level, the Revised NPF states that future planning and development will need to:

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

National Strategic Outcome 8 (*'Transition to a Carbon Neutral and Climate Resilient Society'*) notes that in creating Ireland's future energy landscape, new energy systems and transmission grids will be necessary to enable a more distributed energy generation which connects established and emerging energy sources, i.e. renewables, to major sources of demand.

Chapter 9: Climate Transition and Our Environment, aims to address key national environmental challenges including the transition to a climate neutral economy, sustainable land management, renewable energy and resource efficiency. As per **NPO 70,** the Revised NPF highlights the importance of renewable energy infrastructure to achieve national climate action targets.

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

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, in which the Proposed Project is located, is allocated a target of installing an **additional 978 MW of onshore wind energy 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 Development Plan 2021- 2030

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

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

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

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

National Development Plan – 2025 Review

The National Development Plan Review 2025 (the Updated NDP) sets out a comprehensive capital investment framework for the period 2026–2035, totalling €275.4 billion. Within this framework, wind energy is recognised 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. To support the expansion of renewable electricity generation, the Government has allocated €3.5 billion in equity funding to ESB Networks and EirGrid to enhance grid transmission and distribution infrastructure, which will directly facilitate increased integration of wind energy developments such as the Proposed Project.

2.5.2.2 Project Compliance with National Policy

With regard to the above, it is considered that the Proposed Project is in line with and supported by the NPF, Revised NPF, and the updated NDP.

The Revised NPF projects a population increase of approximately one million people by 2040 and therefore recognises the strain and demand this will put on Irelands energy system. In order to ensure Ireland delivers on our renewable energy and carbon emission reduction targets, the NPF recognises the need for increased renewable energy onto the national grid.

The NDP is clear in its priority to reach a low-carbon, climate resilient society over the lifetime of the NDP. The Proposed Project, if permitted, will provide clean, renewable electricity to the national grid, furthering development objectives of the NDP, namely the target to increase the share of renewable electricity up to 80% by 2030.

This shift from fossil fuels is dependent upon schemes such as the one proposed to generate renewable energy. Given the projected population increase, it is considered that if the share of renewable energy onto the grid is not increased, Ireland will fail to reach the National and International targets on emission reductions. The addition of 14 no. wind turbines, with an estimated electricity generation capacity of 86.8MW, will contribute to Ireland's national targets and support the country in meeting its renewable energy and carbon emission reduction goals at the EU level.

2.5.3 Regional Policy

Southern Regional Assembly Regional Spatial & Economic Strategy

The Southern Regional Assembly (SRA) was established in 2015, the Regional Spatial and Economic Strategy (RSES) for the Southern Region (Carlow, Clare, Cork, Kerry, Kilkenny, Limerick, Tipperary, Waterford and Wexford) came into effect on 31st January 2020. The RSES provides a long-term, strategic development framework for the future physical, economic and social development of the Southern Region. The RSES seeks to achieve balanced regional development and full implementation of Project Ireland 2040 – the National Planning Framework (NPF).

Adopted on the 31st of January 2020, the principal statutory purpose of the Regional Spatial and Economic Strategy (RSES) is to support the implementation of the NPF and NPD, as well as the economic policies and objectives of the Government. The RSES aims to build on the region's strengths and potential to become a more prosperous, sustainable, climate resilient and attractive region for the benefit of all its people. up to 2040 and beyond.

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

To achieve national and EU targets in the context of the electricity sector, the RSES notes that further investment is required to develop alternative renewable 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.

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

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

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

- ***RPO 95 (Sustainable Renewable Energy Generation):*** *It is an objective to support implementation of the National Renewable Energy Action Plan (NREAP), and the Offshore Renewable Energy Plan and the implementation of mitigation measures outlined in their*

respective SEA and AA and leverage the Region as a leader and innovator in sustainable renewable energy generation.

- ***RPO 96 (Integrating Renewable Energy Sources):*** *It is an objective to support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate renewable energy sources and ensure our national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grows.*
- ***RPO 99 (Renewable Wind Energy):*** *It is an objective to support the sustainable development of renewable wind energy (on shore and offshore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.*
- ***RPO 100 (Indigenous Renewable Energy Production and Grid Injection):*** *It is an objective to support the integration of indigenous renewable energy production and grid injection.*

An important element within the Southern RSES is the introduction of a regional scale approach to identifying and capitalising on renewable energy opportunities.

- ***RPO 98 (Regional Renewable Energy Strategy):*** *It is an objective to support the development of a Regional Renewable Energy Strategy with relevant stakeholders.*

This policy instrument, if implemented correctly, could assist in facilitating a more consistent approach to renewable energy / wind strategies at the county level, and furthermore, could identify opportunities for large cross-county renewable schemes via stakeholder led collaboration.

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. In the context of transitioning to a more energy efficient society and increasing renewable sources of energy, the RSES notes that there is a need to set a policy approach which addresses meeting national targets for renewable electricity generation, climate change and security of energy supplies, both regionally and nationally.

The sustainable growth of the Southern Region requires the provision of services and infrastructure central to the RSES strategy in a plan led manner to ensure the sustainable management of environmental resources. As such, existing regional infrastructure represents major and on-going capital and infrastructural investment in strategic national assets and is considered by the RSES as essential for the continued provision of a secure and reliable electricity supply. The sustainable development of the Region, however, must also be balanced with consideration to natural heritage and biodiversity, particularly landscape.

- ***RPO 129*** *notes that it is an objective of the Regional Authority to develop a Regional Landscape Strategy in order to facilitate landscape protection, management and change in the region.*

The RSES sets out a number of infrastructural RPOs, relevant to the Proposed Project, which indicate that the Region is open to, and ready to invest in, renewable energy generation.

- ***RPO 219 (New Energy Infrastructure):*** *It is an objective to support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers (subject to appropriate environmental assessment and the planning process) to ensure the energy needs of future population and economic expansion within designated growth areas and across the Region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs.*

- ***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.*

- ***RPO 222 (Electricity Infrastructure):*** *It is an objective to support the development of a safe, secure and reliable supply of electricity and to support and facilitate the development of enhanced electricity networks and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this plan under EirGrid's (2017) Grid Development Strategy (subject to appropriate environmental assessment and the planning process) to serve the existing and future needs of the Region and strengthen all-island energy infrastructure and interconnection capacity.*

The RSES supports the Southern Region as a Carbon Neutral Energy Region. This policy instrument, if implemented correctly, could assist in facilitating a more consistent approach to renewable energy / wind strategies at the county level. 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. In the context of transitioning to a more energy efficient society and increasing renewable sources of energy, the RSES notes that there is a need to set a policy approach which address meeting national targets for renewable electricity generation, climate change and security of energy supplies, both regionally and nationally.

2.5.3.2 Project Compliance with Regional Policy

The RSES for the Southern Region states 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 and is particularly in line with **RPO 99** and **100** as outlined above.

In the region, a noticeable trend has emerged to recognise and take advantage of emerging opportunities related to the shift towards a decarbonized economy, particularly in the realm of renewable energy generation and therefore the Proposed Project is considered to be in line with Regional Policy.

2.5.4 Local Policy

The Proposed Wind Farm is within the administrative area of Tipperary County Council and therefore, is subject to the planning policies and objectives set out in Tipperary County Development Plan 2022-2028 (TCDP). The Proposed Grid Connection Route traverses lands within Limerick City and County Council's administrative area and the Proposed Project is therefore also subject to the planning policies and objectives set out in the Limerick Development Plan 2022-2028 (LDP).

2.5.4.1 Tipperary County Development Plan 2022- 2028

The TCDP 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.

There are a number of policies within the TCDP which support the decarbonisation of the County, along with the provision of renewable energy developments, such as the Proposed Project, as set out in **Table 2-2** below.

Table 2-2: Policies of the TCDP 2022-2028 and the Proposed Project's Compliance

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 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 Wind Farm 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.
Renewable Energy	**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. 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

Topic	Policy / Objectives	Compliance
		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.
	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 Wind Farm 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.
	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:**	The Proposed Project application considers the impact on protected sites and monuments. Chapter

Topic	Policy / Objectives	Compliance
	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.	13 of the EIAR concludes that no significant direct or indirect negative 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 basis of this Plan (either individually or in combination with other plans, programmes, etc. or projects).	The Proposed Project application considers the impact on protected sites, habitats and species. Chapter 6 of 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).
	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 NIS conclude that the Proposed Project will not give rise to any significant negative impacts on designated sites.

Topic	Policy / Objectives	Compliance
	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. In regards to forestry felling and replanting a note on the consideration of forestry replanting is included at Appendix 2-4 of this EIAR.
	11-5: 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	As detailed in the assessment in Chapter 9 of the EIAR, no significant effects on surface water or 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	A Water Framework Directive Assessment is included in Appendix 9-3 of the EIAR.

Topic	Policy / Objectives	Compliance
	existing ecosystems associated with water courses and their riparian zones, and to enable sustainable public access.	
	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. (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	The Proposed Wind Farm has been designed, cognisant of the fluvial flood risk at the Proposed Wind Farm site. A Flood Risk Assessment is included at Appendix 9-1 of the EIAR and fulfils the requirements for a site-specific flood risk assessment and is consistent with the recommendations made in the TCDP. As detailed in the assessments in Chapter 9 and Appendix 9-1 of the EIAR, no significant effects on surface water or groundwater quality will occur during the construction and operational phases of the Proposed Project.
	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 the EIAR, no significant effects on land, land use, soil and bedrock will occur.

Topic	Policy / Objectives	Compliance
	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.

From a review of the policies outlined above in Table 2-2, it is evident that the Proposed Project is consistent with the objectives of the TCDP in relation to decarbonisation and the development of new renewable energy projects.

2.5.4.2 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 recognises the importance of the renewable resources in County Tipperary in terms of helping Ireland to decrease its reliance on fossil fuels;

> *"Renewable energy resources are indigenous resources and are abundant in Tipperary. By tapping into renewable energy resources Tipperary could reduce this national reliance on fossil fuel imports, achieve a more secure and stable energy supply for the long term, help reduce the impacts of climate change and generate employment and economic growth for the citizens of Tipperary."*

The RES sets out the following policy objectives in relation to renewable energy developments:

- ***RE1:*** *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.*
- ***RE2:*** *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.*

Tipperary County Council seeks to support and facilitate the sustainable provision of a reliable energy supply in the County, with emphasis on increasing energy supplies derived from renewable resources and a reduced dependency on fossil fuels. As outlined above, there are policies in place within the RES which support the development of renewable energy. The Proposed Project affords Tipperary County an opportunity to increase its renewable energy supply.

2.5.4.3 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 2-3 that are relevant to the Proposed Project:

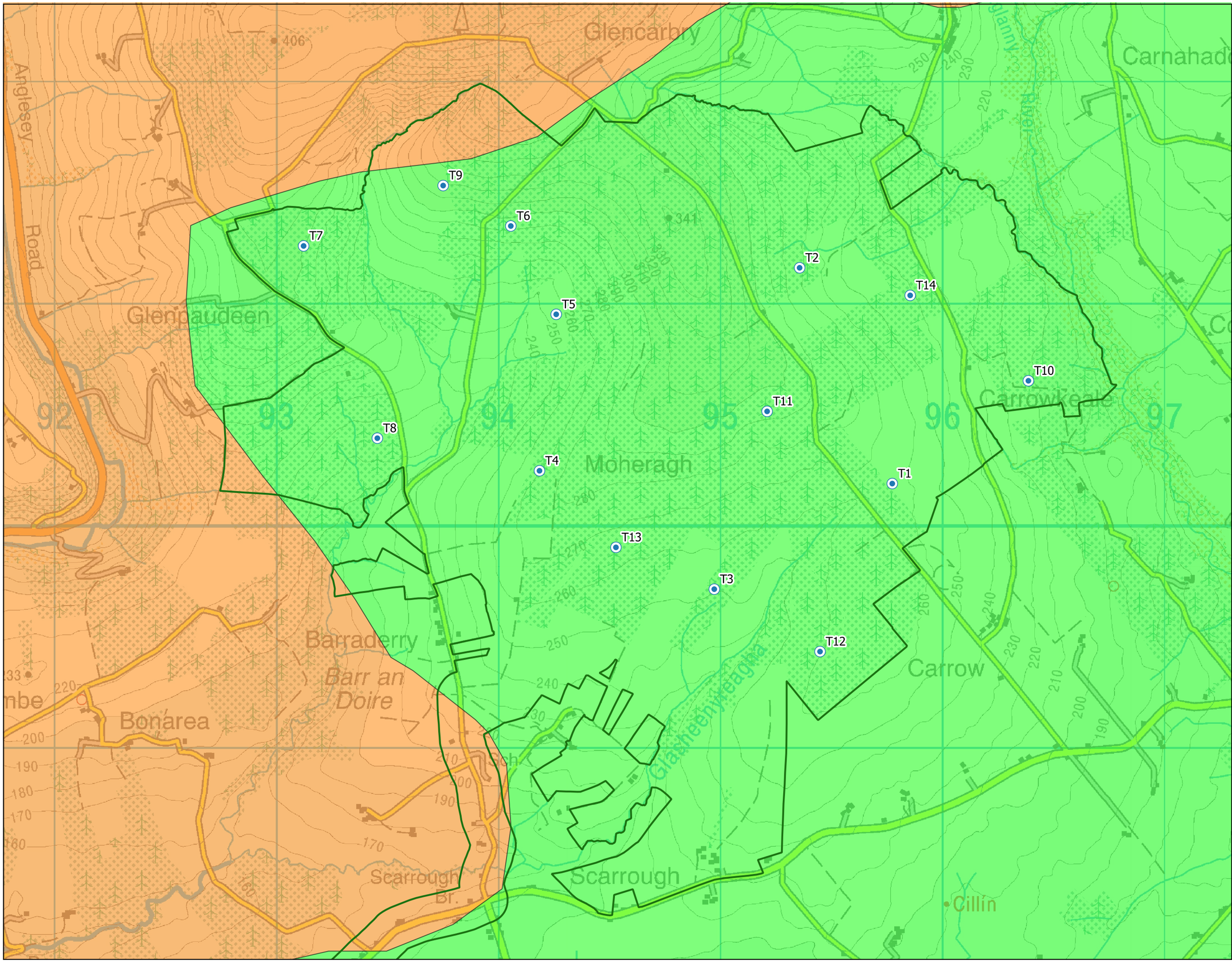
Table 2-3: Wind Energy Strategy Planning Objectives

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 2-3 below.



Map Legend

- EIAR Site Boundary
- Proposed Turbine Locations

County Tipperary Wind Strategy Areas

- Area Open for Consideration
- Areas Unsuitable

Drawing Title: Wind Energy Strategy Areas

Project Title: Carrow Wind Farm

Drawn By	Checked By
ER	EM
Project No.	Drawing No.
231102	Figure 2-3
Scale	Date
1:15,000	2026-03-06

MKO
Planning and Environmental Consultants
Tuam Road, Galway
Ireland, H91 VW84
+353 (0) 91 735611
email:info@mkoireland.ie
Website:
www.mkoireland.ie

Areas that are categorised 'Open for Consideration' are also subject to the following guidelines set out in **Table 2-4** below:

Table 2-4: Wind Energy Strategy Planning Objectives - Areas 'Open for Consideration'

Wind Energy Strategy Planning Objectives		Proposed Project Compliance
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 ACP, 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 (DoELHG 2006 Guidelines) and adheres to the prescribed 4-times-tip-height (740m) setback distance for residential visual amenity (Draft 2019 Guidelines).
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 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.*	A Flood Risk Assessment is included at Appendix 9-1 of the EIAR.

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 2-4, 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.

2.5.5 Tipperary County Council Climate Action Plan 2024-2029

The Tipperary County Council Local Authority Climate Action Plan 2024-2029 (LACAP) highlights the current state of climate action in Ireland, and 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 LACAP will help address the mitigation of greenhouse gases, the implementation of climate change adaption measures, and will strengthen the alignment between national climate policy and the delivery of effective local climate action.

Overall, the GHG emissions generated from County Tipperary equated to 3,703,400 tCO2eq in the baseline year, 2018. The top three emitting sectors within County Tipperary in terms of total greenhouse gas emissions in the baseline year were agriculture, residential, and transport, producing 49.9%, 13.7%, and 13.2% of total emissions respectively. Tipperary County Council, along with all public sector entities must reduce greenhouse gas emissions by 51% by 2030 as compared to 2018 in line with the National Climate Action Plan 2025.

The LACAP for Tipperary assesses climate risk relevant to Ireland and to County Tipperary, this, plus the evidence baseline, inform the climate objectives and actions that will be undertaken by Tipperary County Council to assist in the achievement of national and international climate targets.

The TCDP sets out the overall strategy for the proper planning and sustainable development of the County over a 6-year period. The Development Plan includes numerous objectives on sustainability and climate within, as well as a Renewable Strategy.

The commitment by local authorities to monitor, evaluate, and report annually on the implementation of activities contained in the LACAP provides for more reliable and ambitious climate action, and supports national climate ambitions to 2050.

2.5.6 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.*

Although the Proposed Wind Farm element of the Proposed Project is located in Co. Tipperary and thus is subject to compliance with the TCDP, it is still pertinent to note the LDP's support for the production of renewable energy and the development of wind energy developments, as the Proposed Grid Connection, subject to compliance with the LDP, will ultimately facilitate the connection of clean, renewable energy to the national grid.

Most relevant to the Proposed Project, is the LDP's support for the development of the electricity grid as outlined 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.

2.5.7 Summary of Compliance with Local Policy

In summary, the TCDP acknowledges the importance of renewable energy in reducing anthropogenic greenhouse gas emissions and the contribution of renewable energy in achieving national and EU target net zero greenhouse gas emissions by 2050. The Proposed Project, with an expected generating capacity of 86.8MW, will directly progress TCC's target of increasing the county's wind energy capacity to 600MW, enabling the county to reach its ambition to become a 'climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy'.

There are a range of policies in place in the TCDP which strongly support the development and continued supply of renewable energy onto the national grid. Accordingly, the Proposed Project is consistent with the aims and objectives of the TCDP.

Within the LCDP the development of renewable energy production is also supported. Furthermore, the LCDP also seeks to support the connection of renewable energy developments to the national grid and specifically recognises the Killonan 110kV substation as a key supplier of electricity to the Mid-West Region.

2.5.8 Other Relevant Onshore Wind Energy Planning Policy Publications

DoEHLG Wind Energy Guidelines 2006

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

Each wind project has its own characteristics and defining features, and it is therefore impossible to write specifications for universal use. Guidelines should be applied practically and do not replace existing national energy, environmental and planning policy. While the Guidelines remain the relevant guidelines

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

IWEA Best Practice Guidelines for the Irish Wind Energy Industry 2012

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

IWEA Best Practice Principles in Community Engagement and Community Commitment 2013

IWEA extended its guidance with the publication of this Best Practice in Community Engagement and Commitment. IWEA and its members support the provision of financial contributions by wind farm operators to local communities and have sought to formulate best practice principles for the provision of a community commitment. The document sets out IWEA's best practice principles for delivering extended benefits to local communities for wind farm developments of 5 Megawatts (MW) or above. Best Practice Principles of community engagement when planning the engagement strategy and preparing associated literature are also outlined in the document. The aim of these guidelines is to ensure that the views of local communities are taken into account at all stages of a development and that local communities can share in the benefits.

In December 2016, the (then) Department of Communications, Climate Action and Environment (DCCAE) issued a Code of Practice for wind energy development in relation to community engagement. The Code of Good Practice is intended to ensure that wind energy development in Ireland is undertaken in adherence with the best industry practices, and with the full engagement of local communities. Community engagement is required through the different stages of a project, from the initial scoping, feasibility and concept stages, right through construction to the operational phase. The methods of engagement should reflect the nature of the project and the potential level of impact that it could have on a community. The guidelines advise that ignoring or poorly managing community concerns can have long-term negative impacts on a community's economic, environmental or social situation. Not involving communities in the project development process has the potential to impose costly time and financial delays for projects or prevent the realisation of projects in their entirety. Community engagement in relation to the Proposed Project is discussed in full in Section 2.8 of this Chapter and within the Community Report at Appendix 2-3 of this EIAR.

Commission for Regulation of Utilities: Grid Connection Policy

The Commission for Regulation of Utilities (CRU) (previously the Commission for Energy Regulation (CER)) launched a new grid connection policy in March 2018 for renewable and other generators, known as ECP-1, which seeks to allow "shovel ready" projects that already have a valid planning permission, connect to the electricity networks. The principal objective which guides this decision is to allow those projects to have an opportunity to connect to the network, along with laying the foundations for future, more regular batches for connection. August 2018 saw the applicants for new connection capacity under ECP-1 published.. ECP-2 was launched in June of 2020, which set policy for at least three annual batches of connection offers (ECP 2.1, ECP-2.2, and ECP-2.3). On 4th April 2023 the CRU published its Decision on ECP-2.4, confirming a fourth batch under the ECP-2 policy. The first three ECP-2

application windows (2.1 -2.3) opened for the month of September each year. The application window for the fourth annual batch (ECP-2.4) is open from 1st October - 30th November 2023.The enduring connection policy regime replaces the previous 'Gate' system of grid connection applications. The grid connection application window under ECP-1 was the first time since 2007 that certain renewable energy projects including wind farms had an opportunity to secure a new grid connection offer.

The design of the Proposed Grid Connection has taken account of the *"preferred draft approach"* and accordingly, has been developed with the provisions of the draft Guidelines in mind. This grid connection policy will allow for the Proposed Grid Connection Route, once it is permitted, to connect to the electricity networks under the enduring connection policy regime.

Draft Revised Wind Energy Development Guidelines 2019

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

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

- Acceptable noise thresholds and monitoring frameworks;
- Visual amenity setback;
- Control of shadow flicker; Compliance with Community consultation and dividend requirements, as included within the obligatory Community Report; and
- Consideration of the siting, route and design of the proposed grid connection as part of the whole project

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

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

At time of writing the draft Guidelines are not yet finalised and have not been adopted. The relevant Wind Energy Guidelines for the purposes of section 28 of the Planning and Development Act 2000, as amended, remain those published in 2006. Notwithstanding this, however, due to the timelines associated with the planning process for renewable energy projects it is possible that an updated version of the draft Guidelines may be finalised during the consideration period for the current Proposed Project. To this end, on the basis of the details available from the draft Guidelines it is anticipated that the Proposed

Project will be capable of adhering to the relevant noise and shadow flicker standards, albeit without sight of the final, adopted Guidelines the processes by which the Proposed Project will comply with the same cannot be confirmed at this stage. While the final Guidelines have not yet been published it should be noted that the Proposed Project maintains a four times tip height set back between turbines and identified sensitive receptors, furthermore detailed community consultations have been carried out.

Renewable Energy Support Scheme

The Climate Action Plan 2025 is the Government's plan to give Irish people a cleaner, safer and more sustainable future to halve emissions by 2030 and reach net zero no later than 2050. The Plan sets out actions across every sector which will ensure we meet our future climate commitments. A key part of the Plan is to increase the proportion of renewable electricity to up to 80% by 2030 and a target of 9GW from onshore wind. These measures will be driven by introduction of the Renewable Electricity Support Scheme ('RESS') which aims to promote the generation of electricity from renewable sources.
The RESS is an auction-based scheme which invites renewable electricity projects to bid for capacity and receive a guaranteed price for the electricity they generate.

RESS 1 was the first Renewable Electricity Support Scheme run by the Government of Ireland and concluded in 2020. RESS 2 was run in 2022 and concluded in June 2022. The successful projects in RESS 2 represent a potential increase of nearly 20% in Ireland's current renewable energy generation capacity. They will be delivered between 2023 and 2025. A public consultation was opened in 2022 to refine the Terms and Conditions developed for RESS 2 with a limited and specific set of changes for RESS 3. This consultation closed in December 2022. RESS 3 was ran in 2023 and concluded in September 2023.

The RESS ensures that we are on a pathway to meet our ambitious climate targets and lays the foundations of a thriving and cost-effective renewable electricity market. This will support the growth of the green economy, create sustainable work opportunities, and ultimately benefit the consumer as renewables become more cost effective and increase Ireland's energy security.

The Proposed Project is in accordance with the CAP25 and a grant of permission for the onshore wind energy development will allow for the Proposed Project to participate in the RESS auction and contribute renewable energy generation in achieving Irelands CAP target of 9GW of onshore wind generation by 2030.

2.6 Planning History

This section of the EIAR sets out the relevant planning history within the planning application boundary and also identifies other wind energy development within the wider area (25km from the proposed turbines).

2.6.1 Planning Applications within the Planning Application Boundary

A planning search was carried out through the national planning application database and An Coimisiún Pleanála's online planning portal in March 2026 for relevant planning applications submitted within the past 10 years that fall within the planning application boundary of this application, which are outlined in **Table 2-5** below.

Table 2-5: 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,	Granted by TCC on 18/02/2021

	polishing filter, entrance and all associated site works.	
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) new connections to existing utilities; (e) new waste-water treatment system & percolation area; (f) all associated site works	Granted by TCC 22/03/2022
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 residential and agricultural entrance and including all associated site works, which have been constructed contrary to original planning reference number 04/1451	Granted by TCC on 05/12/2021
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	Granted by TCC on 14/10/2021

	boundary alterations on the applicant's site, and on adjacent lands as may be required.	
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 toilets, staff offices and ancillary training rooms at first floor level. New staff and visitor	Granted by LCCC on 26/01/2024

	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 relocation of a ground floor window and front door	Granted by LCCC on 04/08/2021
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

2.6.2 Wind Energy Developments within 25km of the Proposed Turbines

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 (see Section 2.9 of this Chapter for further details). The search was carried out using the relevant local authority, ACP's and EIA planning portals in February 2026 for relevant planning applications.

In total, 24 no. applications relating to wind energy were identified within 25km of the proposed turbines, 4 no. of which relate to single turbine developments and a further 20 no. of which relate to larger multiple turbine wind farm development. These are outlined in **Table 2-6** below.

Table 2-6: Wind Energy Developments within 25km of the proposed turbines

Pl. Ref.	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Turbine (km)
Single/ Domestic Turbines								
TCC Ref. No. 00/649	Mienvee Turbine	Tipperary	Michael Ryan	erection of a wind turbine not exceeding 60 metres	Granted by TCC 22/09/2000	Existing	1	4.7
TCC Ref. No. 14600062, 15600867	Turaheen Upper Turbine	Tipperary	REI Wind Developments Ltd.	the development will consist of the erection of 1 no. 1.3 MW wind turbine (hub height 60.00m/ blade tip height 91.00m), and the construction of a 14.00 sq.m electrical sub-station, site access road, and all ancillary works. The development represents a change in the works permitted under planning file ref no. 14/600062, namely: an 800kw increase in the output of the turbine, a 10.00m increase in the hub height of the turbine, a 16.65m increase in the blade tip height of the turbine, an 11.00 sq.m reduction in the size of the electrical sub-station, and modifications to the design of the electrical sub-station	Granted by TCC 13/01/2016	Existing	1	5.1
TCC Ref. No. 12510368	Gortnalla Turbine	Tipperary	Denis O'Dwyer	single wind generator with a maximum output set at 500kw. The development will consist of: a single turbine with a maximum hub height of sixty five meters, an electrical switch room, an access track, upgrade of existing entrance, associated infrastructure and all ancillary site works	Granted by TCC 25/01/2013	Existing	1	12.5
TCC Ref. No.	Inchivara Turbine	Tipperary	ABO Wind Ireland Ltd	Two wind turbines, new internal access roads, upgrading of existing internal roads, underground cables and associated works.	Granted by ACP on 01/09/2016	Existing	1	7.2

Pl. Ref.	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Turbine (km)
1410, ACP Ref. No. PL.92.243611								
Large Wind Energy Applications								
TCC Ref. No. 5124325	Ballinlough Wind Farm	Tipperary	Matt O'Meara	Small wind farm consisting of 3 no. 850 kW turbines each with rotor height of 75 m and ancillary works consisting of access roads, control building and ESB compound - E.I.S RECEIVED WITH APPLICATION	Granted by TCC on 28/12/2001	Existing	3	24.4
TCC Ref. No. 5123301, 08510664	Ballinveny Wind Farm	Tipperary	Maureen Mounsey	3 no. IMW wind turbines services roadways & control house at Borrisnafarney & 3 IMW wind turbines service roadways & control house at Ballinveny	Granted by TCC on 03/05/2001, 15/08/2008	Existing	3	24.2
TCC Ref. No. 5122877	Curraghgraigue 1 Wind Farm	Tipperary	Mr. Badan Powell	Erection of three wind turbines and associated ancillary works	Granted by TCC on 01/02/2001	Existing	3	19.9
TCC Ref. No. 04511665, 06511940	Curraghgraigue 2 Wind Farm	Tipperary	Aeolus Energy Ltd	extension of existing windfarm comprising of the construction of 3 No. wind turbines, of 49 meter hub height and with 52 meter rotor diameter, 4.5 meter wide trackways, extension to existing 20kV substation building and associated site development works	Granted by TCC on 31/08/2005	Existing	3	20
TCC Ref. No. 04/1259, 041034, ACP Ref. No. 215597	Garracummer Wind Farm	Tipperary	Garracummer Wind Farm Limited	the development of 26MW wind farm comprising 13 no. 2 MW wind turbines with steel towers and composite fibre rotor blades of hub height up to 67 metres, a rotor diameter of up to 80 metres and base to blade-tip height of up to 107 metres, also including wind turbines transformers, turbine hardstands, new access roads, strengthening and widening of existing	Granted by ACP on 05/05/2006	Existing	15	4.4

Pl. Ref.	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Turbine (km)
				forestry access roads; drainage; a substation control building with fenced compound for electrical equipment; underground electrical cables linking the turbines with the substation compound; underground communication cables, and all associated site works and ancillary development. An Environment Impact Statement is submitted with this application. This development is within the townslands of Curraghmarky, Birchgrove, Moanvaun, Garracummer, Cummer More, Cummer Beg				
TCC Ref. No. 04/1178	Falleennafinoga Wind Farm	Tipperary	John Bourke	two wind turbines, an electectrical substation, a meterological mast 40 metres high and associated ancillary works. The turbines will have a tower hegiht of 65 metres and a blade diameter of 70 metres	Granted by TCC on 10/12/2004	Existing	2	4.3
TCC Ref. No. 07/255, ACP Ref. No. PL.23.225618	Glencarbry 1 Wind Farm	Tipperary	Ecopower Developments Limited	10 no. wind turbines, overall height of 125m, 2 no. 60m high masts and all associated site works. Glencarbry, Piperhill, Glenpaudeen, Glenough Lower, Foilmacduff,	Granted by ACP on 01/02/2008	Existing	7	0.6
TCC Ref. No. 1180, ACP Ref. No. PL.23.239993	Glencarbry 2 Wind Farm	Tipperary	Ecopower Developments Limited	Erect 3 no. wind turbines, overall height up to 126m, access roads and ancillary site works. Glenough Upper	Granted by ACP on 13/02/2013	Existing	2	2.7
TCC Ref. No. 05/287	Holyford Wind Farm	Tipperary	Eco Wind Power Ltd	Development of site consisting of 3 wind turbine generators, 80m in hub height with a rotor diameter up to 90m together with site roads, site notice boards, a control building with a fenced compound and parking for up to ten vehicles and ancillary equipment for generating electricity together with associated site services. An Environmental Impact	Granted by TCC on 30/05/2006	Existing	3	3.5

Pl. Ref.	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Turbine (km)
				Statement was submitted with the Planning Application				
TCC Ref. No. 04/1195, 08136, 08701, 10595	Glenough Wind Farm	Tipperary	Ecopower Development Ltd	11 no. wind turbines up to 80m. hub height and up to 45m. blade length, access roads, control building and ancillary site works	Granted by TCC on 05/11/2004	Existing	14	2.4
TCC Ref. No. 1324, ACP Ref. No. PL.23.242710	Turaheen Lower Wind Farm	Tipperary	Ecopower Development Ltd	erect 3 no. wind turbines, overall height of up to 126.6 meters, electrical control building, access roads and ancillary site works. The application is for a 10 year permission under Section 41 of the Planning and Development Act 2000. The application will be accompanied by an Environmental Impact Statement, which includes an Appropriate Assessment (Natura Impact Statement)	Granted by ACP 01/04/2014	Existing	3	3.2
TCC Ref. No. 06/1695, ACP Ref. No. PL.23.221656	Kill Hill Wind Farm	Tipperary	Kemar Ltd	to construct a windfarm comprising; 19 nr. wind turbines (hub height of between 78 and 86m, rotor diameter of between 71 and 82.4m); electrical tailstation and control building; construction of new, and extension of existing internal site tracks; the construction of 10 no. culverts across streams and drainage ditches; and associated works at Kill hill in the townlands of Kilballyheberry and in the townlands of Knockforlagh, Kilballyherberry, Ballyherberry, Garraun, Ballaghboy and Coleraine in the vincintiy of Dualla. An EIS will be submitted with the Planning Application	Granted by ACP on 13/02/2008	Existing	16	18.9

Pl. Ref.	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Turbine (km)
LCCC Ref. No. 01/1385, 087007, 22646, ACP Ref. No. 130938, 315865	Knockastana Wind Farm	Limerick	Ventus Energy Limited	Wind farm including 6 turbines, sub-station, access road and both a temporary and permanent monitoring mast. Curraghafoil, Doon, Co. Limerick.	Granted by ACP on 16/07/2003	Existing	4	8.4
TCC Ref. No. 03510743, 07/510779, ACP Ref. No. 224595	Templederry	Tipperary	Patrick O'Donoghue	two wind turbines and access road (Environmental Noise Assessment Report submitted with application)	Granted by ACP on 16/09/2009	Existing	2	18.4
TCC Ref. No. 13/510003, ACP Ref. No. 243040, 310171, 318773	Upperchurch Wind Farm	Tipperary	Ecopower Developments Ltd.	10 year permission for 22 wind turbines,2 no.meteorological masts with wind measuring equipment attached, access roads, electrical substation compound, control buildings and ancillary works.	Granted by ACP on 12/08/2014	Existing	22	7.5
TCC Ref. No. 12510385	Milestone Wind Farm	Tipperary	ABO Wind Ireland Ltd	wind energy project comprising of five wind turbines each with a maximum tip height of 126 metres. construction of new access tracks and the upgrading of existing tracks, an electrical substation, a borrow pit and associated works. The application is for a 10 year permission; an E.I.S. accompanies the application	Granted by ACP on 29/01/2014	Existing	3	8
TCC Ref. No. 07/364, 13/210 ACP Ref. No. PL.23.225669	Cappawhite A Wind Farm	Tipperary	D.P. Energy Limited	8 wind turbines with towers up to 80m in height and rotor diameter up to 90m and ancillary equipment.	Granted by ACP on 07/02/2008	Existing	8	4

Pl. Ref.	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Turbine (km)
TCC Ref. No. 11/6, 13/210, ACP Ref. No. PL.23.225669	Cappawhite B Wind Farm	Tipperary		14 wind turbine extension to approved windfarm including access tracks,control building, substation,anemometer masts, burrow pits, associated siteworks. Bahagha, Curraheen, Foilaclug, Foildarg,	Granted by ACP on 08/05/2012	Existing	9	2.9
ACP Ref. No. PA92.321454	Brittas Wind Farm	Tipperary	Brittas Wind Farm Limited	Proposed development of 10 Wind Turbines, 110kV Electrical Substation and ancillary development within the townlands of Brittas, Rossestown, Clobanna, Brownstown, Killeenleigh, Kilkillahara, Brittasroad, Coolgarrane, Athinid More, Cassestown, Laghtagalla, Farranreigh, Furze, Loughlahan, Ballygammane, County Tipperary.	N/A	Proposed	10	20
ACP Ref. No. PC92.311587	Littleton Wind Farm	Tipperary	Bord na Móna Powergen Limited	Proposed development of between 14 and 18 no. wind turbines, 110kV on-site substation and associated connection to the national grid.	N/A	Pre-Planning	11	24.5

2.7 Scoping and Consultations

2.7.1 Scoping

Scoping is the process of determining the content, depth and extent of topics to be covered in the environmental information to be submitted to a competent authority for projects that are subject to an EIA. This process is conducted by contacting relevant authorities and Non-Governmental Organisations (NGOs) with interest in the specific aspects of the environment with the potential to be affected by the proposal. These organisations are invited to submit comments on the scope of the EIAR and the specific standards of information they require. Comprehensive and timely scoping helps ensure that the EIAR refers to all relevant aspects of the Proposed Project and its potential effects on the environment and provides initial feedback in the early stages of the EIAR preparation, when alterations are still easily incorporated into the design. In this way scoping not only informs the content and scope of the EIAR, but it also provides a feedback mechanism for the proposal design itself.

As part of the constraints mapping process, which is detailed in Chapter 3 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 documents, providing details of the Proposed Project, was prepared by MKO and circulated in March 2024. The scoping document was circulated again in October 2024 as a follow up to the relevant bodies who had yet to respond. The scoping document provided details of the Proposed Project and set out the scope of work for the EIAR. Consultees were invited to contribute to the EIAR by suggesting baseline data, survey techniques and potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR.

2.7.2 Scoping Responses

Table 2-7 lists the responses received from the bodies to whom the scoping document was circulated. **Table 2-8** lists the responses received from telecoms bodies to whom the scoping document was circulated. **Table 2-9** and **Table 2-10** provide a summary of the responses received. Copies of all scoping responses received are included in **Appendix 2-1** of this 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.

Table 2-7: Scoping List and Responses

No.	Consultee	Date of Response
1.	An Taisce	No response received
2.	Aviation Navigation Ireland	No response received.
3.	Bat Conservation Ireland	No response received.
4.	BirdWatch Ireland	No response received.
5.	Coimisiún na Meáin	Response received on 28th Match 2024 and 11th October 2024.
6.	Commission for Regulation of Utilities	No response received.
7.	Department of Agriculture, Food and the Marine	Response received on 30th July 2024 and 22nd November 2024.
8.	Department of Defence	Response received on 8th April 2024 and 16th October 2024.
9.	Department of Housing, Local Government and Heritage	Acknowledgement receipt of correspondence on 28th March 2024 and 11th October 2024
10.	Department of the Environment, Climate and Communications	Response received on 17th April 2024, on behalf of GSI.

11.	Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media	No response received.
12.	Department of Transport, Tourism and Sport	Response received on 30th April 2024 and 30th October 2024.
13.	Environmental Protection Agency	Acknowledgement receipt of correspondence on 2nd April 2024 and 14th October 2024.
14.	Eirgrid	No response received.
15.	Failte Ireland	Response received on 26th June 2024 and 24th October 2024.
16.	Forest Service	No response received.
17.	Geological Survey of Ireland	Response received on 17th April 2024
18.	Health Service Executive	Response received on 15th May 2024 and 15th October 2024.
19.	Iarnród Éireann	No response received.
20.	Inland Fisheries Ireland	No response received.
21.	Irish Aviation Authority	Response received on 28th March 2024 and 11th October 2024.
22.	Irish Peatland Conservation Council	No response received.
23.	Irish Raptor Study Group	No response received.
24.	Irish Red Grouse Association	No response received.
25.	Irish Wildlife Trust	No response received.
26.	Limerick City and County Council	Acknowledgment receipt of correspondence on 17th October 2024.
27.	Office of Public Works	No response received.
28.	Shannon Airport	Response received on 28th March 2024 and 22nd October 2024.
29.	Southern Regional Assembly	Acknowledgment receipt of correspondence on 28th March 2024 and 10th October 2024.
30.	Sport Ireland	No response received.
31.	Sustainable Energy Authority of Ireland	No response received.
32.	The Heritage Council	No response received.
33.	Tipperary County Council – Environment Department	Acknowledgment receipt of correspondence 11th October 2024.
34.	Tipperary County Council – Heritage Officer	No response received.
35.	Tipperary County Council – Planning Department	Response received on 2nd April 2024 and 14th October 2024.
36.	Tipperary County Council – Roads Department	Acknowledgment receipt of correspondence 11th October 2024.
37.	Transport Infrastructure Ireland	Acknowledgment receipt of correspondence 10th October 2024.
38.	Waterways Ireland	Response received on 28th March 2024 and 11th October 2024.
39.	Uisce Éireann	Response received on 22nd April 2024 and 11th November 2024.

Table 2-8: Telecoms Scoping List and Responses

No.	Consultee	Date of Response
1.	2rn	Response received on 12th April 2023
2.	Airwave	Response received on 13th April 2023
3.	Cellnex	Response received on 11th April 2023

4.	Cork County Council	Response received on 24th April 2023
5.	Eir	Response received on 25th April 2023 and 29th of June 2023
6.	Enet	Response received on 6th April 2023
7.	ESB Telecoms	Response received on 17th April 2023 and on 23rd May 2023
8.	Imagine	Response received on11th April 2023 and 23rd May 2023
9.	Irish Rail	Response received on 6th April 2023
10.	JFK Communications	Response received on 20th June 2023
11.	Tetra	Response received on 24th April 2023
12.	Three	Response received on 11th April 2023 and 25th April 2023
13.	Viatel	Response received on 6th April 2023
14.	Vodafone	Response received on 6th April 2023 and 24th April 2023
15.	Westnet	Response received on 6th April 2023
16.	Whizzy Internet	Response received on 11th April 2023
17.	RTÉ	No response received.
18.	BAI	No response received.
19.	Dense Air	No response received.
20.	BB Net	No response received.
21.	Fastcom	No response received.
22.	Hibernian Towers	No response received.
23.	Towercom	No response received.
24.	Ivertec	No response received.
25.	Virgin Media	No response received.

Table 2-9: Summary of response received from Consultees

Consultee	Date of Response	Response Summary	Addressed in Chapter
Coimisiun Na Mean	Response received on 28th Match 2024 and 11th October 2024.	States that there is no in-depth analysis on the effect of wind turbines or electrical substations on FM networks, but no issues recorded from existing wind farms.	N/A
Department of Agriculture, Food and the Marine	Response received on 30th July 2024 and 22nd November 2024.	No comment provided as the activity doesn't fall within the remit of EIA regulations under the Department of Agriculture, Food and the Marine.	N/A
Department of Defence	Response received on 8th April 2024 and 16th October 2024.	The Department of Defence is responsible for the regulation of military aviation, whereas the IAA is responsible for the safety regulation of civil aviation including aerodromes. › All turbines should be illuminated by Type C, medium intensity, fixed red obstacle lighting with a minimum output of 2,000 candela to be visible in all directions of azimuth and be operational 24/7. › Obstacle lighting should be incandescent or, if LED or other types are used, of a type visible to Night Vision equipment. Obstacle lighting used must emit light at the near Infra-Red (IR) range of the electromagnetic spectrum, specifically at or near 850 nanometres (nm) of wavelength. Light intensity to be of similar value to that emitted in the visible spectrum of light. It is stated that any Irish Air Corps (IAC) requirements for are separate to Irish Aviation Authority (IAA) requirements.	Chapter 15: Material Assets

Department of Transport	Response received on 30th April 2024 and 30th October 2024.	The Department considers that the construction involved in providing this wind farm development, especially the connection cables to the national grid may have effects on both the environment and the Regional/Local Road Network. Provision of list of items to be considered if the placement of cables in one or more trenches within the extents of the public road network is proposed. Provided a list of alternative options for grid connection that could be considered. Provided a list of conditions that should be applied in the case of a grant of permission.	Chapter 3 Consideration of Reasonable Alternatives Chapter 15 Material Assets
Failte Ireland	Response received on 26th June 2024 and 24th October 2024	Issued PDF of Failte Ireland's EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects.	Chapter 5 Population and Human Health
Geological Survey Ireland	Response received on 17th April 2024	DECC forwarded a response on behalf of Geological Survey Ireland (a division of the DECC). Provided datasets for use when conducting the EIAR, SEA, planning and scoping processes for developments, plans and policies. Requests that a copy of reports detailing site investigations is sent to them, if development goes ahead.	Chapter 8 Land, Soils and Geology Chapter 9 Water
Health Service Executive	Response received on 15th May 2024 and 15th October 2024.	Provided general guidance and recommended documents for the relevant EIAR sections/chapters from a health perspective. Recommended the inclusion and assessment of the following matters: Public Consultation, Decommissioning of the Wind Farm, Siting and location of turbines, Noise and Vibration, Shadow Flicker, Air Quality, Surface and Ground Water Quality, Geological Impacts, Ancillary Facilities and overall Cumulative Impacts.	Chapter 1 Introduction Chapter 3 Consideration of Reasonable Alternatives Chapter 4 Description Chapter 5 Population and Human Health Chapter 8 Land Soils and Geology Chapter 9 Water

			Chapter 10 Air Quality Chapter 12 Noise and Vibration
Irish Aviation Authority	Response received on 28th March 2024 and 11th October 2024.	High-level comments given as proposed turbine locations and tip heights were not included. States that in the event of planning consent being granted, IAA to be contacted to › Agree aeronautical obstacle warning light scheme for the wind farm development, › Provide as-constructed coordinates in WGS84 format together with ground and tip height elevations at each wind turbine location and › Notify the Authority of intention to commence crane operations with at least 30 days prior notification of their erection	Chapter 15 Material Assets
Shannon Airport	Response received on 28th March 2024 and 22nd October 2024.	Outside the limit for possible effect/interferences on the aerodromes Obstacle Limitational Surfaces (OLS). Forwarded email to Air Nav Ireland for further correspondence. General points to note in respect of the regulators perspective on wind farm developments would include: › If turbines are within 45km of Shannon Airport's Aerodrome Reference Point (ARP) are greater than 100m in height, required to be included in the IAA Electronic Air Navigation Obstacle Dataset › Provided specifications for Aerodrome Design – Chapter Q (Visual Aids for Denoting Obstacles) › During construction phase of any development, any crane activity on the site must be pre-approved by completion of the Shannon Airport Crane Operations application form	Chapter 15 Material Assets
Tipperary County Council – Planning Department	Response received on 2nd April 2024 and 14th October 2024.	Advised that it is not the practice of Tipperary County Council to engage in informal EIA scoping requests.	Chapter 4 Description

Waterways Ireland	Response received on 28th March 2024 and 11th October 2024.	No comment given, as the area of the proposed Wind Farm development is not located within any zone of influence.	Chapter 9 Water
Uisce Eireann	Response received on 22nd April 2024 and 11th November 2024.	States that careful consideration is needed of potential impacts of proposed development on all public water sources and details of measures should be provided to ensure no negative impacts to drinking water sources. States that designs should be agreed with the Diversions team prior to submission when building near/over existing Uisce Eireann assets. Where appropriate, an associated Build Over/Diversion agreement will need to be executed between the applicant and Uisce Eireann, prior to the commencement of construction works.	Chapter 9 Water Chapter 15 Material Assets

Table 2-10: Summary of Response received from Telecoms Consultees

Consultee	Date of Response	Response Summary	Addressed in Chapter
2rn	12th April 2023	States that the proposed wind farm will not affect 2rn's fixed linking. There is however a risk of interference to broadcast services in the area, and would therefore ask that a protocol be signed between 2rn and the developers should the site go ahead.	Chapter 15 Material Assets
Airwave	13th April 2023	State that they have no infrastructure in this area.	N/A

Cellnex	11th April 2023	States that they do not have telecoms installation in the affected area. Advises that ComReg is contacted to identify any potential link interference.	N/A
Cork County Council	24th April 2023	States that they don't have any links in the area.	N/A
Eir	25th April 2023	States that they 8 transmission links within the proposed area that could be at risk and provides the end points of these transmission links. Requests that a buffer of 100 meters radius away from this transmission path when placing turbines and to send them on for further analysis on the Eir mobile and Eir fixed network.	Chapter 15 Material Assets
Enet	6th April 2023	Provided details of links located at TC Laghtseefin.	Chapter 15 Material Assets
ESB	17th April 2023	States that there is no expected impact on the microwave or the point to multipoint radio networks from the proposed wind farm development.	N/A
Imagine	11th April 2023 and 23rd May 2023	States that Imagine have equipment on Towercom Laghtseefin, at the northern edge of the development. States that two microwave links are present over the same path. States that a setback of 50m is required for these links.	Chapter 15 Material Assets
Irish Rail	6th April 2023	States that they have no wireless links in these areas.	N/A

JFK Communications Ltd	20th June 2023	States that they do not have any infrastructure in the area.	N/A
Tetra Ireland	24th April 2023	Provides location at which they have equipment. States that they specify an exclusion zone of 500m from this location in all directions. Requests that the development is also reviewed by Eir.	Chapter 15 Material Assets
Three	11th April 2023 and 25th April 2023	Provides details and coordinates of links that pass through the proposed development boundary. Requests a setback distance of 50m from these links.	Chapter 15 Material Assets
Viatel	6th April 2023	States that the proposed development does not affect Viatel wireless infrastructure.	N/A
Vodafone	6th April 2023 and 24th April 2023	States that they have one link crossing the development and provides details of this link. States that the setback for this link would be 40m from the tip of the blade and advises that this can be recalculated once the positions of the turbines and the blade length are finalised.	Chapter 15 Material Assets
Westnet	6th April 2023	States that they don't have any infrastructure in the vicinity that would be affected by the proposed development.	N/A
Whizzy Internet	11th April 2023	States that they have no links in the area.	N/A

2.7.3 Other Consultations

2.7.3.1 Pre- Planning Meetings

2.7.3.1.1 *Tipperary County Council*

Pre-Application Meeting (Section 247)

Members of the project team first met with Tipperary County Council 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 An Coimisiún Pleanála.

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
- Turbine Delivery Route (TDR) and Grid Connection Route

2.7.3.1.2 *Limerick City and County Council*

Pre-Application Meeting (Section 247)

Members of the project team met with Limerick City and County Council in February 2025. The purpose of this meeting was to discuss the Proposed Grid Connection and provide a high-level introduction to the Proposed Project. 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 project team gave an overview of 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.

2.7.3.1.3 *An Coimisiún Pleanála*

The Applicant engaged with An Coimisiún Pleanála 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 ACP in September 2024 in relation to a Proposed Project comprising of 14 no. wind turbines and associated infrastructure.

First Pre-Application Meeting

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

On behalf of ACP:

- 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 ACP on 8th of January 2026 via Microsoft Teams in accordance with Section 37B of the Act. Those in attendance were:

On behalf of ACP:

- 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 set out the following information which provided updates on the Proposed Project and discussed matters relating to the Renewable Energy Directive (RED) III and the completeness check requirements. 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 ACP. On the 23rd of March 2026, ACP 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 ACP. A copy of the SID Determination Letter is enclosed at **Appendix 2-2** of this EIAR.

2.8 Community Consultation

The Community Engagement Strategy for the Proposed Project was based around engaging with the local community in an open, honest and transparent manner with the aim of not only provide clear and understandable information but also to gain feedback to understand the views of the local community.

A Community Liaison Officer (CLO) was appointed for the project, with responsibility for acting as the point of contact for members of the public with questions or queries about the Proposed Project. A dedicated CLO email address and phone number were established in August 2025 to allow members of the public to communicate directly with the project team.

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 constantly 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 development.

On 21st of January 2026 a Public Information Event was held at the Annacarty Community Hall, 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.

Appendix 2-3 of this EIAR contains a full and detailed Community Report. The report was prepared to record the consultation carried out with local community in respect of the Proposed Project.

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 in several ways.

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.

2.9 Cumulative Impact Assessment

The EIA Directive and associated guidance documents state that as well as considering any direct, indirect, secondary, transboundary, short, medium-, and long term, permanent and temporary, positive and negative effects of the project the description of likely significant effects should include an assessment of cumulative impacts that may arise. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to a proposed development or project. The factors to be considered in relation to cumulative effects include population and human health, biodiversity, land, soil, water, air quality, climate, material assets, landscape, cultural heritage, and major accidents / vulnerability to natural disasters, as well as the interactions between these factors.

To gather a comprehensive view of cumulative impacts on these environmental considerations and to inform the EIAR process being undertaken by the consenting authority, each relevant chapter within this EIAR includes a cumulative impact assessment where appropriate.

The potential for cumulative impacts arising from other projects has therefore been fully considered within this EIAR.

2.9.1 Methodology for the Cumulative Impact Assessment of Projects

The potential cumulative impact of the Proposed Project, combined with the potential impact of other projects has been carried out with the purpose of identifying what influence the Proposed Project will have on the surrounding environment when considered collectively with proposed and existing projects, projects pending a decision from a planning authority, projects in the public domain such as those SID at pre-consultation with ACP, and land-uses in the vicinity of the Proposed Project site location.

The cumulative impact assessment of projects has three principle aims:

1. *To establish the range and nature of existing and approved projects within the cumulative impact study area of the Proposed Project.*
2. *To summarise the relevant projects which have a potential to create cumulative impacts.*
3. *To identify the projects that hold the potential for cumulative interaction within the context of the Proposed Project and discard projects that will neither directly nor indirectly contribute to cumulative impacts. (Note: this is done by individual competent experts with respect to their specialist area of expertise.)*

Projects were identified through a search of relevant online planning and environmental registers and effects were considered following a review of associated EIARs.

2.9.2 Establishing the Cumulative Long List

To establish a long list of existing, permitted and proposed projects to be included in the cumulative impact assessment, cumulative study areas were established for each individual topic area in the EIAR. Following consultation with the EIAR team on each individual topic, the maximum geographical extent of each cumulative study area and justification for this extent was established and is presented in **Table 2-11** below. Each cumulative study area was established with regard for the potential environmental receptors, potential impact pathways, topic specific guidance, best practice and professional judgement.

Table 2-11: Cumulative Study Areas and Justifications

Individual Topic	Maximum Extent	Justification
Population & Human Health (including shadow flicker)	Electoral divisions (EDs) where the Proposed Wind Farm is located (Clonoulty West and Donohill). Shadow Flicker Study Area (10xRD buffer from proposed turbines). For the Proposed Grid Connection, the Study Area for Population is identified as 250m from the proposed underground electrical cabling route. Consideration for the Population & Human Health cumulative extent is also given to the Air Quality, Climate, Water, Noise and Landscape & Visual (i.e. Residential Visual Amenity) Cumulative Study areas.	The Proposed Wind Farm Population Study Area encompasses the EDs in which the Proposed Wind Farm is located, all properties within the Population Study Area has been assessed for cumulative impacts with the Proposed Wind Farm. The Guidelines (DoEHLG, 2006) note that shadow flicker effects are unlikely to occur outside of 10 times the rotor diameter of the turbines. For the assessment of cumulative shadow flicker, any other existing, permitted or proposed wind farms are considered where their ten times rotor diameter shadow flicker study area are located within the Shadow Flicker Study Area of 1.63km (ten times the rotor diameter from proposed turbines) for the Proposed Wind Farm, the closest wind farms are the operational Glencarbry Wind Farm located approximately 0.63km north of the Proposed Wind Farm turbine (T7) and the operational Glenough Wind Farm located 2.5km northeast of the Proposed Wind Farm turbine (T2). As such, the 10 times rotor diameter shadow flicker study area for these permitted projects would overlap with that of the Proposed Wind Farm 10 times rotor diameter Shadow Flicker Study Area. Following on from assessments, no dwellings may be impacted by shadow flicker from the Proposed Project in combination with other existing, permitted, or proposed wind farms.

		Due to the nature of the works associated with the Proposed Grid Connection, cumulative impacts on Population & Human Health are unlikely to occur with any project outside this Study Area.
Biodiversity – Flora & Fauna, Bats	10km from the Proposed Wind Farm site. 250m from the Proposed Grid Connection. The Proposed Grid Connection cumulative boundary is captured within the 25km buffer from the proposed turbines Consideration for the Biodiversity cumulative extent is also given to the Bats, Birds and Water Cumulative geographical boundaries. The cumulative study area for Bats is 10km.	Using the precautionary approach and given the nature and scale of the Proposed Project, the geographical boundary for terrestrial ecological aspects, i.e. habitats and fauna (excluding bats and birds), is 2km for cumulative assessment of other non-wind farm projects for the Proposed Wind Farm and 200m from the Proposed Grid Connection. The Proposed Wind Farm site is located within the River Suir catchment. These catchments were assessed in line with the EU Water Framework Directive (2000/60/EC), as amended by Directives 2008/105/EC, 2013/39/EU and 2014/101/EU ("WFD"), which was established to ensure the protection of the water environment. Bats are a mobile species which can cover large distances for foraging and roosting over a range of varied habitats. As recommended by NatureScot 2021 (Section 4), a 10km cumulative study area is considered for potential cumulative effects on bats.
Birds	25km from the proposed turbines for large infrastructural development, such as wind farms, energy and public transport developments. Consideration for the Birds cumulative extent for the Proposed Grid Connection is also given to the Biodiversity cumulative geographical boundaries; i.e., 250m from the Proposed Grid Connection. The Proposed Grid Connection cumulative boundary is captured within the 25km buffer from the proposed turbines	NatureScot guidance '*Assessing the Cumulative Impacts of onshore Wind Energy Developments*' (SNH, 2012; 2018) was consulted while undertaking the cumulative assessment. SNH (2012; 2018) emphasises that its priority is to '*maintain the conservation status of the species population at the national level.*' However, it is acknowledged that consideration should also be allowed for impacts at the regional level '*where regional impacts have national implications (for example where a specific region holds the majority of the national population)*'. Following the guidance of SNH (2012), the cumulative impact assessment has been carried out at the scale of the importance rating of the receptor. A 25km radius of the Proposed Wind Farm turbines was considered a reasonable approximation of the size of a county and a 25km radius of the Proposed Wind Farm turbines was considered a reasonable approximation for the local level.

		Using the precautionary approach the geographical boundary for terrestrial ornithological aspects, i.e. birds, is 250m from the Proposed Grid Connection.
Land, Soils and Geology	EIAR Site Boundary	As there is no pathway for offsite cumulative impacts for Land, Soils and Geology, the cumulative study area is the EIAR Site Boundary.
Water	Proposed Wind Farm: WFD Catchment for large infrastructural developments such as wind farms, energy and public transport developments. River Sub Basins for all smaller proposed, permitted or existing plans or projects (i.e. private and commercial type developments). Proposed Grid Connection: 250m from Proposed Grid Connection; the Proposed Grid Connection cumulative boundary is captured within the 25km buffer from the proposed turbines	Regional surface water catchments are used for cumulative impact assessment with regard large infrastructural developments such as wind farms, energy and public transport developments. The potential for cumulative effects for these developments likely exists on a regional catchment scale (i.e. significant works likely existing in several sub-basins). Therefore, other wind-farm developments are considered within the River Suir Catchment for cumulative effects. River Sub Basins are used for smaller developments (i.e. private & commercial type developments). These developments are not likely to present a significant cumulative impact risk on a regional catchment scale as any effects would likely be imperceptible as a result of the setback distances and localised nature of the associated works.
Air Quality	Air Quality Study Area is 1km from Proposed Wind Farm site. 250m from Proposed Grid Connection; the Proposed Grid Connection cumulative boundary is captured within the 25km buffer from the proposed turbines	Given dust particles do not generally travel greater than 250m from source (Guidance on the Assessment of Mineral Dust Impacts for Planning, IAQM 2016) the geographical boundary for the cumulative dust impact is 250m.
Climate	The climate assessment has been considered on a national basis and is not confined to a specific study area.	The climate assessment has considered the cumulative effects of the Proposed Project with other developments on a national basis under the relevant national Sectoral Emissions Ceilings.
Noise & Vibration	The list of wind farms which were initially considered in cumulative assessment extended to 25km of the proposed turbines. 250m from Proposed Grid Connection; the Proposed Grid Connection cumulative boundary is	The geographical boundary for the cumulative noise assessment is the area within which noise levels from the proposed, consented and existing wind turbine(s) may exceed 35 dB LA90 at up to 10 m/s wind speed (Institute of Acoustics document Good Practice Guide To The Application Of Etsu-R-97 For The Assessment And Rating Of Wind Turbine Noise).

	captured within the 25km buffer from the proposed turbines	As the nearest proposed, permitted or existing wind turbine is approximately 0.63km from the proposed turbines, it is therefore considered that the effect on the noise environment associated with the Proposed Project in combination with other wind farm developments is not significant. Due to the narrow nature of the Proposed Grid Connection trench, a 250m buffer zone is an appropriate scale when considering potential cumulative noise effects.
Cultural Heritage	20km buffer from the Proposed Wind Farm site. 250m from Proposed Grid Connection; the Proposed Grid Connection cumulative boundary is captured within the 25km buffer from the proposed turbines	Cumulative impacts on setting are more likely to occur at the operational stage of the development (i.e. post-construction). In this regard in order to assess overall cumulative effects on archaeology and cultural heritage the Proposed Project is considered in the context of other developments, in particular other permitted and proposed wind farms within 20km of the Proposed Wind Farm turbines. Direct effects for the Proposed Project are considered to be confined to within the Site and relate to construction effects. Due to the narrow nature of the Proposed Grid Connection trench, a 250m buffer zone is an appropriate scale when considering potential cumulative cultural heritage effects
Landscape & Visual	20km buffer from the proposed turbines for Landscape and Visual effects (LVIA Study Area). 15km from Proposed Wind Farm turbines for effects on landscape character (LCA Study Area).	The LVIA study area has been chosen as 20 kilometres, following the guidance on Appendix 3 of the Guidelines (DoEHLG, 2006) which provides that 'For blade tips in excess of 100m, a Zone of Theoretical Visibility radius of 20km would be adequate' (Guidelines (DoEHLG, 2006), Page 94, Draft Guidelines (DoHPLG, 2019), Page 152) The LCA Study Area has been chosen as 15 kilometres for effects on Landscape Character Areas. Through experience conducting LVIA for other wind energy development projects, the assessment team determined that no significant effects on landscape character areas are likely to arise beyond distances of 15km from the proposed turbines. Therefore, a LCA Study Area of 15km is deemed appropriate for effects on landscape character in relation to the assessment of effects upon designated Landscape Character Areas.

Material Assets: Traffic & Transport	25km buffer from proposed turbines for large infrastructural developments such as wind farms, energy and public transport developments. Following that, the proposed transport route for each project is considered. 250m from Proposed Grid Connection; the Proposed Grid Connection cumulative boundary is captured within the 25km buffer from the proposed turbines	The geographical boundary for the traffic & transport cumulative assessment is defined by the potential for other projects to overlap with the Proposed Project delivery highway network, and so a 25km buffer from turbines and 200m buffer from the Proposed Grid Connection is deemed appropriate to capture other plans and projects with the potential for cumulative effects with the Proposed Project.
Material Assets: Telecoms	The list of wind farms and other projects which were initially considered in cumulative assessment extended to 25km from Proposed Wind Farm turbines. 250m from Proposed Grid Connection; the Proposed Grid Connection cumulative boundary is captured within the 25km buffer from the proposed turbines	The geographical boundary for the telecoms cumulative assessment is defined by the potential for other wind farm projects to interfere with broadcast signals that interact with the Proposed Project.

Once the cumulative study areas were identified and justified, a search was conducted across various platforms and databases in order to compile a list of projects and ongoing activities in the area. The sources used to establish the cumulative long list are provided in **Table 2-12** below. The data was first compiled spatially through a Geographic Information System (GIS). The spatialised data was then exported into a list for further scrutiny and review. This formed the cumulative long list provided in **Appendix 2-5**.

The maximum extent of each cumulative search buffer was determined by the largest specific cumulative study area buffer (25km from EIAR Site Boundary), as shown in **Table 2-11** above. All EIAR chapters did not use the maximum extent of the largest buffer. In instances where a specific chapter's cumulative study area was smaller than the cumulative search maximum extent, the cumulative long list was filtered by distance to infrastructure/boundary, creating a chapter specific long list unique to each cumulative study area set out in **Table 2-11** above.

Table 2-12: Data sources used for long list compilation

Title	Description	Author
Planning Applications	https://housinggovie.maps.arcgis.com/apps/webappviewer/index.html?id=9cf2a09799d74d8e9316a3d3a4d3a8de	Department of Housing, Local Government and Heritage
An Coimisiún Pleanála Cases	https://www.pleanala.ie/en-ie/map-search	An Coimisiún Pleanála
EIA Portal Points	https://housinggovie.maps.arcgis.com/apps/webappviewer/index.html?id=d7d5a3d48f104ecbb206e7e5f84b71f1	Department of Housing, Local Government and Heritage
Licenced Facilities	https://gis.epa.ie/EPAMaps/	EPA

Waste Schemes	https://gis.epa.ie/EPAMaps/ & MKO's interanl database	EPA & MKO

To allow sufficient time for the cumulative impact assessment to be undertaken for each EIAR topic, the final search and compilation of the cumulative plans and projects list was carried out in February 2026. Therefore, plans and projects that were applied for after February of 2026 are not considered in the cumulative impact assessment.

2.9.3 Projects Considered in the Cumulative Impact Assessment

2.9.3.1 Planning Applications & Permissions

A search was conducted using data from Tipperary County Council's, Limerick City & County Council's and ACP's planning portals to search for all planned and/or permitted planning applications within 25km of the application site boundary. Planning applications considered within this boundary include all live/extant permissions available on the various online portals mentioned above. This distance was chosen as it is considered that cumulative impacts would not exist with any development proposed/permitted greater than 25km from the Proposed Wind Farm and 1km from the Proposed Grid Connection Route.

Expired planning applications were excluded from the cumulative assessment as it is considered that such development has either been constructed and therefore forms part of the existing baseline or they have not been constructed and the planning permission has expired. Invalid or refused planning applications were also excluded from the cumulative impact assessment. Planning applications (including Local Authority and ACP cases) were then categorised by development description into development categories, and any relevant/large-scale developments were highlighted to the EIAR project team for inclusion in the cumulative impact assessment in each individual EIAR chapter.

2.9.3.2 EPA Licenced Activities

EPA licensed activities refer to industrial and waste management operations that require a license from the Environmental Protection Agency under various pieces of environmental legislation. A list of all EPA licenced activities within the cumulative study area is included in Appendix 2-5.

The categories of EPA licenced activities considered as part of the cumulative assessment are as follows:

- Industrial Emissions (IE) Licensing;
- Integrated Pollution Control (IPC) Licensing;
- Waste Licensing; and
- Waste Water Discharge Authorisations.

2.9.3.3 Wind Farm Applications within 25km of the Proposed Turbines

A planning search was carried out to establish proposed, permitted and operational wind energy developments within 25km of the Proposed Wind Farm turbines. The search was carried out using the relevant local authority and ACP databases in February 2026 for relevant planning applications. In total, 23 no. applications relating to wind energy were identified within 25km of the proposed turbines, 4 no. of which relate to single turbine developments and a further 19 no. of which relate to larger multiple turbine wind farm development. These are outlined in greater detail in Table 2-6 above.

In addition to this wind energy developments at pre-application stage or within the public domain (i.e public consultation commenced) are also considered and included in the cumulative wind farm list within 25km of Proposed Wind Farm turbines.

2.9.3.4 Summary

The cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider all potential significant cumulative effects arising from relevant projects and land uses within the cumulative study area. Existing land uses within the cumulative study area includes renewable energy, commercial forestry and agricultural pastural land. Furthermore, the cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider all potential significant cumulative effects arising from all land uses in the vicinity of the Proposed Project. These include permitted and existing wind farms in the area, solar farms, energy storage, ongoing agricultural practices/forestry practices, quarries and extractive industries, intensive production/ processing industries, large infrastructure projects and other EIAR projects.

Overall, the Proposed Project has been designed to avoid and mitigate impacts on the environment and a suite of mitigation measures is set out within the EIAR. The mitigation measures set out in this EIAR will ensure that significant cumulative effects do not arise during the construction, operational or decommissioning phases of the Proposed Project. Additional detail in relation to the potential significant cumulative effects arising and, where appropriate, the specific suite of relevant mitigation measures proposed are set out within each of the relevant chapters of this EIAR.