

4 PLANNING POLICY

4.1. INTRODUCTION

This Chapter sets out the planning policy and legislative context relevant to the Proposed Development by providing an overview of the main international, national, and regional legislation and policy of relevance, as well as a detailed review of the planning policy framework within which the application will be assessed. This section also provides a brief overview of the most up-to-date statistics on Irish renewable energy production, climate emissions, and the benefits the Proposed Development can bring to supporting Ireland's 2030 and 2050 renewable energy targets.

The planning policy assessment shows that the Proposed Development aligns with European, National and Local Plan Policies. In particular, the Proposed Development will help to meet the objectives of the Climate Action Plan 2025 (CAP2025) and the Climate Action and Low Carbon Development Act 2015, as amended by the Climate Action and Low Carbon Development (Amendment) Act 2021 (the "Climate Act"). The Tirawley Wind Farm Development can make an important contribution to Ireland's renewable energy targets. The Proposed Development will have a generating capacity of c. 68.8 MW maximum export capacity (MEC) and will be of economic and social importance to both the region and the state.

The urgency to combat climate change and meet energy demands is evident in reviewed policies, emphasizing the vital role of renewable energy in transitioning to a climate neutral economy and society. By investing in renewable energy, Ireland can promote sustainable economic development using its own, secure and clean energy.

In summary, the Proposed Development would:

- Contribute to the 45% overall renewable energy target for the EU introduced by the REPowerEU Plan considering the war in Ukraine.
- Compliance with the Renewable Energy Directive (RED III).
- Contribute to assisting Ireland to increase from 40.4% electricity produced by renewable sources in 2020 to 80% by 2030 to meet the national target.
- Contribute towards the National Development Plan 2021-2030's National Strategic Outcomes.
- Contribute towards climate change mitigation as specified in the National Planning Framework's National Policy Objective 54.

- Contributes towards climate change mitigation as specified in the National Planning Framework's National Policy Objective 69.
- Contribute toward renewable energy use and generation as specified in the National Planning Framework's National Policy Objective 70.
- Contributes towards climate change mitigation as specified in the National Planning Framework's National Policy Objective 71.
- Contribute c. 68.8 MW MEC of renewable wind energy to the national CAP2025 target by 9 GW by 2030 helping to reduce the current c. 4 GW shortfall.
- Comply with the Regional Spatial and Economic Strategy for the North and Western Region's goals of producing renewable energy to tackle climate change, meet predicted growth in demand and provide energy security.
- Support the local Mayo County Development Plan policy on promoting appropriate renewable energy development and assist the county in achieving its goal of being the national leader in renewable energy generation to facilitate a low carbon future.
- Contribute an anticipated c. 68.8 MW of renewable wind energy to the Mayo County Development Plan target.
- Contribute to rural economic development in line with the Mayo County Development Plans and the RESS.

4.1.1 Statement of Authority

Jennings O'Donovan & Partners Limited (JOD) have extensive experience in all aspects of wind farm development, from design and planning stages through to construction. JOD have been active as engineering consultants in the wind energy market in Ireland since 1998 and have completed numerous wind farm projects, varying from single wind turbine installations to large-scale, multi-turbine developments with a total of over 3,000 MW generation capacity.

This section has been prepared by Mr. Darren Timlin of JOD.

Mr. Darren Timlin is a Graduate Environmental Scientist and holds a Bachelor (Hons.) Degree in Environmental Science from the Atlantic Technological University. Darren has 3 years' experience drafting EIARs and Screening Reports, Appropriate Assessments for Wind Farms, Hydrogen Plants and Power Generation Plants. He forms part of the Environmental team responsible for preparing the EIAR Chapters. Darren has experience drafting EIARs and Screening Reports, Appropriate Assessments for Wind Farms,

Hydrogen Plants and Power Generation Plants. He has experience in the use of Arc GIS Pro and Auto CAD 2D.

The chapter has been reviewed by Mr. David Kiely, Director of JOD. Mr. Kiely has 43 years' experience in the civil engineering and environmental sector. He has obtained a Bachelor's Degree in Civil Engineering and a Master's in Environmental Protection, has overseen the construction of over 50 wind farms and has carried out numerous soils and geology assessments for EIARs. He has been responsible in the overall preparation of in excess of 60 EIARs.

4.2 IRISH PLANNING LEGISLATION AND POLICY CONTEXT

Table 4.1: Irish Planning Legislation and Policy Context

| Legislation / Policy | Context | Reference |
|--|---|--|
| Planning and Development Act 2000 (as amended) (PDA 2000) | The Planning and Development Act sets out the statutory basis for the carrying out of an Environmental Impact Assessment (EIA). | Planning and Development Act 2000 (as amended). Available at: https://www.irishstatutebook.ie/eli/2000/act/30/enacted/en/html (Accessed: 01st April 2026). |
| Planning and Development Regulations 2001 (as amended) | The Planning and Development Regulations implement PDA 2000 by prescribing the details of the planning code. | Planning and Development Regulations 2001 (as amended). S.I. No. 600 of 2001. Available at: https://www.irishstatutebook.ie/eli/2001/si/600/made/en/print (Accessed: 01 st April 2026). |

| Legislation / Policy | Context | Reference |
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| Habitats and Birds Directives | The Habitats Directive 92/43/EEC and the Birds Directive 2009/147/EC set out the requirements for the protection of habitats and species and in the case of the latter, bird species, of European and national importance. For the purposes of planning, these directives have been transposed into Irish legislation under the Planning and Development Act (in particular Part XAB), the Planning and Development Regulations (in particular Part 20), and the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended). | Habitats Directive. Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora. Available at: https://eur-lex.europa.eu/eli/dir/1992/43/oj/eng (Accessed: 01st April 2026). |
| Wildlife Act 1976, as amended | The requirements for the designation and protection of habitats and species in a natural heritage area (NHA) are set out in the Wildlife Act 1976, as amended. | Wildlife Act 1976 (as amended). Available at: https://www.irishstatutebook.ie/eli/1976/act/39/enacted/en/print.html (Accessed: 01 st April 2026). |
| EIA Directive | The relevant sections of the EIA Directive are transposed in Ireland through the PDA 2000 (Part X) and the Planning Regulations 2001 (in particular, Part 10, Schedule 5 and | 1. European Union (2011). Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the |

| Legislation / Policy | Context | Reference |
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| | Schedule 6), Schedule 5 and Schedule 6). | assessment of the effects of certain public and private projects on the environment (as amended by Directive 2014/52/EU). Available at: https://eur-lex.europa.eu/eli/dir/2011/92/oj/eng (Accessed: 01 st April 2026). |
| National Energy Security Framework | Ireland has one of the highest rates of importing fuel in Europe with import dependency increasing to 78% in 2023 according to the SEAI ¹ . Energy demand in Ireland has been growing and is expected to continue to increase by 37% to 2031 ² . The high rate of imported fossil fuel dependency and the increasing demand for electricity make it vital to introduce more domestic renewable energy generation like the Proposed Development in County Mayo. The National Energy Security Framework (DECC, 2022) sets out how Ireland is seeking to phase out | Department of Climate, Energy and the Environment (2022). National Energy Security Framework. Available at: https://assets.gov.ie/221399/86cb99f5-58e3-4821-bc4c-e1bb1fa706fb.pdf (Accessed: 01 st April 2026). |

¹ Sustainable Energy Authority of Ireland (SEAI) (2024). Energy In Ireland. Available at: <https://www.seai.ie/sites/default/files/publications/energy-in-ireland-2024.pdf> [Accessed 01st April 2026].

² EirGrid. (2022). EirGrid's Generation Capacity Statement Predicts Challenging Outlook for Ireland. Available at: <https://www.eirgridgroup.com/newsroom/eirgrids-generation-capac/#:~:text=The%20GCS%2C%20in%20its%20median,relatively%20consistent%20across%20the%20decade.> [Accessed 01st April 2026].

| Legislation / Policy | Context | Reference |
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| | <p>dependency on gas, oil and coal imports in order to address the urgent need to secure a long-term, resilient energy supply.</p> | |
| <p>Climate Action Plan 2025 (CAP2025)</p> | <p>The Plan was approved by Government on 15th April 2025. Climate Action Plan 2025 builds upon the previous plan (Climate Action Plan 2024) by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings, for example, a roadmap for taking decisive action to halve Ireland's emissions by 2030 and to reach net zero no later than 2050. It also outlines the intention of the government to meet up to 80% of electricity demand from renewable power by 2030.</p> | <p>Department of Climate, Energy and the Environment (2025). Climate Action Plan 2025. Available at: https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/climate-action-plan-2025/ (Accessed: 01st April 2026).</p> |
| <p>Climate Action and Low Carbon Development Act 2015 (Amendment) (the Climate Act)</p> | <p>The Climate Act provides for the establishment of a national framework with the aim of achieving a climate-resilient, biodiversity rich, environmentally sustainable and climate neutral economy by 2050 (referred to in the Climate Act as the "national climate objective"). The Climate Action</p> | <p>Climate Action and Low Carbon Development Act 2015 (as amended). Available at: https://www.irishstatutebook.ie/eli/2015/act/46/enacted/en/html (Accessed: 01st April 2026).</p> |

| Legislation / Policy | Context | Reference |
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| | <p>Act 2015 was commenced in the days before the historic COP21 agreement in Paris where consensus was reached by 200 countries on the need to reduce greenhouse gas emissions.</p> <p>The Climate Act supports Ireland's transition to Net Zero and a target of achieving a climate neutral economy by no later than 2050. It has established a legally binding framework containing clear targets and commitments which are set in law to embed the necessary structures and processes on a statutory basis to achieve our national, EU and international climate goals and obligations in the near and long term.</p> | |
| <p>The National Planning Framework</p> | <p>The National Planning Framework (NPF) (provided for in the Planning and Development (Amendment) Act 2018, as amended) is intended to guide development and investment through a shared set of national objectives and principles. It is then left to the three regional planning bodies and the 31 city and county councils to take a lead in refining these into more detailed plans.</p> | <p>Department of Housing, Local Government and Heritage (2025). National Planning Framework. First Revision. Available at: https://cdn.npf.ie/wp-content/uploads/National-Planning-Framework-First-Revision-April-2025-1.pdf (Accessed: 01st April 2026).</p> |

| Legislation / Policy | Context | Reference |
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| | <p>On 8th April 2025, the Government approved the Revised National Planning Framework (NPF) which is subject to the approval of both Houses of the Oireachtas.</p> | |
| <p>The National Development Plan 2021-2030</p> | <p>The National Development Plan (NDP) sets out the investment priorities that will underpin the implementation of the National Planning Framework, through a total investment of approximately €116 billion. This represents a very substantial commitment of resources and is expected to move Ireland close to the top of the international league table for per capita public investment.</p> | <p>Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation (2021). National Development Plan 2021–2030. Available at: https://assets.gov.ie/static/documents/national-development-plan-2021-2030.pdf (Accessed: 01st April 2026).</p> |
| <p>Regional Planning</p> | <p>The Local Government Reform Act 2014, as amended provided for three new regional assemblies: the Northern and Western, Eastern and Midland and Regions. Members of the Regional Assemblies consist of the local authorities within that region.</p> <p>The RSES 2019-2031 for the Northern and Western Regional</p> | <p>Northern and Western Regional Assembly (2019). Regional Spatial and Economic Strategy 2019-2031. Available at: https://www.emra.ie/rses-download/EMRA-RSES.pdf (Accessed: 01st April 2026).</p> |

| Legislation / Policy | Context | Reference |
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| | <p>Assembly area provides a long-term regional level strategic planning and economic framework, to support the implementation of the National Planning Framework, for the future physical, economic and social development for the Northern and Western Region.</p> | |
| <p>The Mayo County Development Plan 2022-2028</p> | <p>Under Section 9 of the Planning and Development Act, each planning authority is obliged to make a Development Plan for the whole of its functional area. The Development Plan (City/County Development Plan [CDP]) is a statutory land-use plan generally consisting of a written statement and associated maps. The Development Plan is the statutory land use plan which sets out a strategy for the proper planning and sustainable development for the area.</p> <p>The County Mayo Development Plan 2022-2028 was adopted in June 2022. The County Mayo Renewable Energy Strategy is included as part of the CDP 2022-2028.</p> | <p>Mayo County Council (2022). Mayo County Development Plan 2022–2028. Available at: https://www.mayo.ie/planning/county-development-plans/2022-2028 (Accessed: 01st April 2026).</p> |

| Legislation / Policy | Context | Reference |
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| <p>The Wind Energy Development Guidelines, DoHLG 2006 (WEDGs 2006)</p> | <p>The Wind Energy Development Guidelines (DoHLG, 2006) (WEDGs 2006) offer advice to planning authorities on planning for wind energy through the development plan process and in determining applications for planning permission. The guidelines are also intended to provide a consistency of approach throughout the country in the identification of suitable locations for wind energy development and the treatment of planning applications for wind energy developments.</p> | <p>Department of Housing, Local Government and Heritage (2006). Wind Energy Development Guidelines. Available at: https://assets.gov.ie/static/documents/wind-energy-development-guidelines-2006.pdf (Accessed: 01st April 2026).</p> |
| <p>Draft Revised Wind Energy Development Guidelines (Department of Housing, Local Government and Heritage, 2019)</p> | <p>The Applicant will comply with aspects of the Draft Wind Energy Guidelines 2019 (DWEDGs 2019) (meaning also compliance with the WEDGs 2006) in relation to shadow flicker, community engagement and visual amenity setback distances (4x tip height). However, as the current version WEDGs 2006 remain valid until the revised final version of the DWEDGs 2019 are published by the government, the WEDGs 2006 have been complied with</p> | <p>Department of Housing, Local Government and Heritage. Draft Revised Wind Energy Development Guidelines (2019). Available at: https://assets.gov.ie/static/documents/draft-revised-wind-energy-development-guidelines-december-2019-385c92c2-16f9-4511-80bf.pdf (Accessed: 01st April 2026).</p> |

| Legislation / Policy | Context | Reference |
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| | <p>in some areas of assessment, such as in Chapter 11: Noise.</p> <p>The DWEDGs 2019 set out how wind energy is to be delivered in accordance with best practice and in particular, in partnership with people living in areas local to Projects. The Draft guidelines, provide a roadmap as to how Ireland's 2030 climate commitments can be met and ultimately move the country towards a position of net zero emissions by 2050. The key aspects for the new draft proposed wind energy guidelines include the following:</p> <ul style="list-style-type: none"> • A visual amenity setback of 4 times the turbine height between a wind turbine and the nearest residential property, subject to a mandatory minimum distance of 500 metres • the elimination of shadow flicker • The application of a more stringent noise limit, consistent with World Health Organisation standards • The introduction of new obligations in relation to | |

| Legislation / Policy | Context | Reference |
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| | <p>community engagement with local communities along with the provision of community benefit measures.</p> | |
| <p>The National Landscape Strategy for Ireland 2015-2025</p> | <p>Ireland signed and ratified the Council of Europe's European Landscape Convention (ELC) which came into effect on 1 March 2004. The Convention has been ratified by thirty-eight countries. It obliges Ireland to implement policy changes and objectives concerning the management, protection and planning of the landscape. The National Landscape Strategy will be used to ensure compliance with the ELC and to establish principles for protecting and enhancing it while positively managing its change. It is a high-level policy framework to achieve balance between the protection, management and planning of the landscape by way of supporting actions.</p> | <p>Department of Arts, Heritage and the Gaeltacht (2015). National Landscape Strategy for Ireland 2015–2025. Available at: https://assets.gov.ie/static/documents/national-landscape-strategy-for-ireland-2015-2025-9ce09c1d-594f-48df-ae6d-f5171f39d6d4.pdf (Accessed: 01st April 2026).</p> |

| Legislation / Policy | Context | Reference |
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| <p>Water Framework Directive (2000/60/EC)</p> | <p>Water quality and quantity in our rivers, lakes, groundwaters, estuaries and coastal waters is assessed under the Water Framework Directive (WFD).</p> <p>The <u>Water Framework Directive</u> was signed into law in October 2000. It requires EU member States to achieve water quality of at least <i>Good Status</i> in rivers, lakes, groundwater, estuaries and coastal waters, by 2027 at the latest.</p> <p>Water quality has to be protected – no declines should be allowed occur – and restored where necessary to reach these environmental objectives</p> | <p>Water Framework Directive. Directive 2000/60/EC of the European Parliament and of the Council establishing a framework for Community action in the field of water policy. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32000L0060 (Accessed: 01st April 2026).</p> |
| <p>National Biodiversity Plan 2023 - 2030</p> | <p>Ireland's 4th National Biodiversity Action Plan (NBAP) sets the national biodiversity agenda for the period 2023-2030 and aims to deliver the transformative changes required to the ways in which we value and protect nature.</p> <p>The 4th NBAP strives for a “whole of government, whole of society” approach to the governance and conservation of biodiversity. The aim is to ensure that every citizen, community, business, local</p> | <p>National Parks and Wildlife Service (2023). National Biodiversity Action Plan 2023–2030. Available online at: https://www.npws.ie/sites/default/files/files/4th National Biodiversity Action Plan.pdf (Accessed: 01st April 2026).</p> |

| Legislation / Policy | Context | Reference |
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| | <p>authority, semi-state and state agency has an awareness of biodiversity and its importance, and of the implications of its loss, while also understanding how they can act to address the biodiversity emergency as part of a renewed national effort to “act for nature”.</p> <p>This National Biodiversity Action Plan 2023-2030 builds upon the achievements of the previous Plan. It will continue to implement actions within the framework of five strategic objectives, while addressing new and emerging issues:</p> <ul style="list-style-type: none"> • Objective 1 - Adopt a Whole of Government, Whole of Society Approach to Biodiversity • Objective 2 - Meet Urgent Conservation and Restoration Needs • Objective 3 - Secure Nature’s Contribution to People • Objective 4 - Enhance the Evidence Base for Action on Biodiversity • Objective 5 - Strengthen Ireland’s Contribution to | |

| Legislation / Policy | Context | Reference |
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| | International Biodiversity Initiatives | |

4.3 INTERNATIONAL CLIMATE POLICY

This section of the EIAR documents the international policy perspectives with regards to climate change and renewable energy. Ireland is party to both the United Nations Framework Convention on Climate Change and the Kyoto Protocol, which together provide an international legal framework for addressing climate change.

4.3.1 The United Nations Framework Convention on Climate Change

In 1992, fifty countries ratified 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 sets no binding limits on greenhouse gas emissions for individual countries and contains no enforcement mechanisms. Instead, the framework outlines how specific international treaties (called "Protocols" or "Agreements") may be negotiated to set binding limits on greenhouse gases. The convention enjoys near universal membership, with 197 countries listed as being Parties to the Convention³.

4.3.2 The United Nations Sustainable Development Goals 2015

The 2030 Agenda for Sustainable Development, adopted by all United Nations Member States in 2015, provides a shared blueprint for peace and prosperity for people and the planet, now and into the future. At its heart are the 17 Sustainable Development Goals (SDGs), which are an urgent call for action by all countries - developed and developing - in a global partnership. The UN Sustainable Development Goals are the blueprint to achieve a better and more sustainable future for all. They address the global challenges

³ <https://climate-adapt.eea.europa.eu/en/metadata/organisations/united-nations-framework-convention-on-climate-change-unfccc> [Accessed: 01/04/2026]

we face, including poverty, inequality, climate change, environmental degradation, peace and justice. Learn more and take action.

The Proposed Development positively contributes to the following UN Sustainable Development Goals:



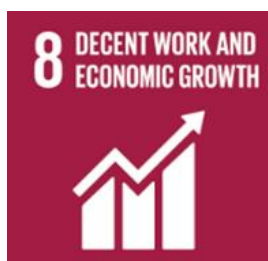
(3) Good Health and Well-Being

By producing renewable energy, the Proposed Development contributes to the displacement of fossil fuels, which pollute the air, this improves air quality, which is closely linked to good health and well-being. See **Chapter 10: Air and Climate** for details.



(7) Affordable and Clean Energy

The Proposed Development would produce a renewable energy source locally, this improves Ireland's energy security and helps to stabilize and reduce energy costs for households and businesses.



(8) Decent Work and Economic Growth

The Proposed Development is a renewable energy enterprise, representing a multi-million euro investment into the West. This could attract new enterprise to the county, bringing jobs and economic growth. This is examined in more detail in **Chapter 5: Population and Human Health**



(9) Industrial, Innovation and Infrastructure

The Proposed Development by producing renewable energy contributes to decarbonising industry sectors through electrification. The Substation and Grid Connection will become assets of the national grid under the management of EirGrid and assist in improving energy infrastructure in the region.



(11) Sustainable Cities and Communities

The renewable energy that the Proposed Development will generate will help support Ireland's low carbon transition and reduce anthropogenic greenhouse gases. The Proposed Development could provide power for to up to 12,000 homes with renewable energy.



(13) Climate Action

By generating renewable energy and displacing fossil fuels the Proposed Development helps to reduce carbon emissions and other greenhouse gases and mitigate climate change, supporting Ireland's transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050.

4.3.3 The Kyoto Protocol (1997)

The Kyoto Protocol operationalised the United Nations Framework Convention on Climate Change by committing industrialized countries and economies in transition to limit and reduce greenhouse gas emissions, with agreed individual targets. It was adopted on the 11th of December 1997 by 192 parties, although only entered into force on the 16th of February 2005 due to a complex ratification process. Under the Kyoto Protocol, the EU agreed to achieve a significant reduction in total greenhouse gas emissions of 8% below 1990 levels in the period 2008 to 2012. Ireland's contribution to the EU commitment for the period 2008 – 2012 was to limit its greenhouse gas emissions to no more than 13% above 1990 levels.

4.3.4 The Doha Amendment to the Kyoto Protocol

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

New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from 1st January 2013 to 31st December 2020.

A revised list of greenhouse gases (GHG) to be reported on by parties in the second commitment period; and amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period. During the first commitment period, 37 industrialised countries and the European Community committed to reduce GHG emissions to an average of 5% against 1990 levels. During the second commitment period, parties, including Ireland, committed to reduce GHG emissions by at least 18% below 1990 levels in the eight-year period from 2013 to 2020; however, the composition of parties in the second commitment period is different from the first.

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

4.3.5 COP21 – The Paris Agreement (2016)

The Paris Agreement is a legally binding international treaty on climate change. It was adopted by 196 Parties at COP 21 in Paris, on 12th December 2015 and entered into force on 4 November 2016. It seeks to accelerate and intensify the actions and investment needed for a sustainable low carbon future. Its central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. The Agreement also aims to strengthen the ability of countries to deal with the impacts of climate change. The Paris Agreement commits the EU as a whole to reduce greenhouse gas emissions by at least 40% by 2030, compared with 1990 levels. This figure was revised upwards under Article 4 of Regulation 2021/1119 by the EU in April 2021 to a 55% domestic Green House Gas reduction by 2030 compared to 1990.

However, a report by the International Energy Agency (IEA) cautions that renewables growth will still need to double to reach the Paris Agreement goal of achieving net-zero emissions by 2050. The International Renewable Energy Agency (IRENA), an intergovernmental organisation focusing on sustainable energy, in a report on the Nationally Determined Contributions relating to renewable energy also note that even with the renewable energy pledges in the 2021 Paris agreement, the 1.5 °C goal will still be exceeded before the end of the century.

4.3.6 COP26 – Glasgow (2021)

The United Nation's (UN) 26th global climate summit was held in 2021 in Glasgow, where nations committed to a range of decisions in a collective effort to limit global temperatures to 1.5 degrees. The conference focused on driving action across:

- Mitigation - reducing emissions.
- Adaptation - helping those already impacted by climate change.
- Finance - enabling countries to deliver on their climate goals.
- Collaboration - working together to deliver even greater action.

4.3.7 COP27 – Egypt (2022)

The 27th Global climate summit; The COP27 UN Climate Change Conference, was held in 2022 in Egypt. Agreement was reached on financing loss and damage from the impacts of climate change – an agreement which was negotiated in part by Ireland's Minister for Environment, Climate and Communications, Eamon Ryan.

4.3.8 COP28 – United Arab Emirates (2023)

The SEAI (Sustainable Energy Authority of Ireland) 2023 Report⁴ underscores that COP28 took place in Dubai. Simultaneously, reports from the Global Carbon Project indicate that the world is projected to surpass the consumption of coal, oil, and gas in 2023 compared to 2022. In light of this concerning global trend, some experts estimate that achieving global net-zero emissions by 2040 is essential to stay within the target of limiting warming to 1.5 degrees.

COP28 was particularly momentous as it marked the conclusion of the first 'global stocktake' of the world's efforts to address climate change under the Paris Agreement. Having shown that progress was too slow across all areas of climate action – from reducing greenhouse gas emissions, to strengthening resilience to a changing climate, to getting the financial and technological support to vulnerable nations – countries responded with a decision on how to accelerate action across all areas by 2030. This includes a call on governments to speed up the transition away from fossil fuels to renewables such as wind and solar power in their next round of climate commitments.

Out of 189 Parties that have ratified the Paris Agreement, 90% mentioned renewables and roughly 70% included quantifiable energy targets in their initial Nationally Determined Contributions. However, a report by the International Energy Agency (IEA) cautions that renewables growth will still need to double to reach the Paris Agreement goal of achieving net-zero emissions by 2050. The International Renewable Energy Agency (IRENA), an intergovernmental organisation focusing on sustainable energy, in a report on the Nationally Determined Contributions relating to renewable energy also note that even with the renewable energy pledges in the 2021 Paris agreement, the 1.5 °C goal will still be exceeded before the end of the century.

⁴ SEAI Energy in Ireland 2023: <https://www.seai.ie/publications/Energy-in-Ireland-2023.pdf> [Accessed: 01/04/2026]

4.3.9 COP29 – Azerbaijan (2024)

At COP29 in Baku (Dec. 2024), several pivotal agreements were reached. A new climate finance goal was set to mobilize \$300 billion annually by 2035, with efforts to raise \$1.3 trillion per year from public and private sources. An agreement on carbon markets was established, creating pathways for sustainable business actions. Additionally, a new loss and damage fund was operationalized, with \$800 million pledged to aid adaptation efforts. Enhanced measures for transparent climate reporting were also agreed upon to ensure accountability and progress tracking. These agreements aim to accelerate global climate action and support vulnerable nations in adapting to climate impacts.

4.3.10 Project Compliance with International Climate Policy

Ireland is one of the 186 countries signed up to the Paris agreement, under the terms, Ireland is required to reduce greenhouse gas emissions by at least 40% by 2030 when compared with levels in 1990. The Proposed Development will contribute to Ireland meeting these targets by displacing reliance on fossil fuels.

4.3.11 Bern Convention

The Convention aims to ensure conservation of wild flora and fauna species and their habitats. Special attention is given to endangered and vulnerable species, including endangered and vulnerable migratory species specified in appendices.

The Parties undertake to take all appropriate measures to ensure the conservation of the habitats of the wild flora and fauna species. Such measures should be included in the Parties' planning and development policies and pollution control, with particular attention to the conservation of wild flora and fauna. The Parties undertake to promote education and disseminate general information concerning the need to conserve species of wild flora and fauna and their habitats.

The Convention establishes a Standing Committee on which the Parties are represented by their delegates. The Committee's principal task is to monitor the provisions of this Convention in the light of development of the wild flora and the assessment of its needs. For this purpose, the Standing Committee is especially competent to make recommendations to the Parties and amendments to the appendices where these protected species are specified.

4.4 EUROPEAN LEGISLATION & POLICY CONTEXT

The European Union's (EU) energy policies are set out and powered by three main objectives:

- To ensure energy providers operate in a competitive environment, ensuring affordable prices for homes and businesses.
- To secure energy supplies and to ensure reliable energy delivery whenever and wherever it is needed; and
- To have sustainable energy consumption, through lowering dependence on fossil fuels and decreasing greenhouse gas emissions and pollution.

The importance of delivering on these key objectives have been underlined by the Commission's robust and ambitious response to the ongoing conflict in Ukraine – and has seen a suite of legislative files introduced in the sustainability and environmental sectors in its current mandate.

The EU will be climate neutral by 2050. To do this, it will carry out a series of initiatives that will protect the environment and boost the green economy⁵.

4.4.1 EU Directive 2011/92/EU (as amended by EU Directive 2015/52/EU)

European Union Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment (the 'EIA Directive'), was transposed into Irish planning legislation by the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001 (as amended). The objective of the Directive (Directive 2011/92/EU), as amended by Directive 2014/52/EU, is to ensure a high level of protection of the environment and human health, through the establishment of minimum requirements for EIA, prior to development consent being given, of public and private developments that are likely to have significant effects on the environment.

Planning Authorities and the Commission have lengthy experience in assessing the effects of projects on the environment as this is an integral part of considering whether the proposal is in the interests of proper planning and sustainable development of the area. The European Union (Planning and Development) (Environmental Impact Assessment)

⁵ European Commission https://climate.ec.europa.eu/eu-action/climate-strategies-targets/2050-long-term-strategy_en
[Accessed 01/04/2026]

Regulations 2018 transpose the requirements of the EIA Directive (as amended) into existing planning consent procedures.

The EIA Directive defined the EIA process as a process consisting of:

- (a) the preparation of an Environmental Impact Assessment Report (EIAR) by the Developer
- (b) the carrying out of consultations
- (c) the examination by the competent authority of the EIAR, any supplementary information provided, where necessary, by the developer and relevant information received through consultations with the public, prescribed bodies and any affected Member States
- (d) the reasoned conclusion of the competent authority on the significant impacts of the project on the environment and
- (e) the integration of the competent authority's reasoned conclusion into any development consent decision.

4.4.2 Renewable Energy Directive

The EU passed the first Renewable Energy Directive (REDI) 2009/28/EC, revised in 2018 and 2023, to make the EU a global leader in renewable energy and ensure that the target of the final energy consumption for the current RED III is achieved.

In 2023, the European Union (EU) adopted an amendment of the Renewable Energy Directive, which is referred to as "RED III". RED III obliges Member States to collectively ensure the share of renewable energy in the European Union's gross final energy consumption is at least 42.5% by 2030, with an additional 2.5% indicative top-up to allow the target of 45% to be achieved.

RED III also places the presumption of imperative reasons of overriding public interest (IROPI) for renewable energy projects on a permanent footing. Article 16f states that Member States must ensure that in the permit-granting procedure, the planning, construction and operation of renewable energy plants, their connection to the grid, the grid itself and storage assets are assumed to be IROPI.

Furthermore, Article 16b (1) provides that the permit-granting procedure for onshore renewable energy projects outside renewables acceleration areas must not exceed two years.

Ireland was one of 26 Member States that failed to fully transpose the provisions of RED III by the deadline of 21 May 2025. The provisions relating to permitting procedures were due to be implemented by 1 July 2024. The provisions relating to permitting procedures have now been implemented through the *European Union (Planning and Development) (Renewable Energy) Regulations 2025*.

4.4.3 The European Green Deal 2019

The European Green Deal 2019 resets the European Commission's commitment to tackling climate and environmental-related challenges. It focuses on three key principles for the clean energy transition, which will help reduce greenhouse gas emissions and enhance the quality of life of our citizens:

- (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.

The European Green Deal is a plan to make the EU's economy sustainable. The EU aims to be climate neutral in 2050. Reaching this target will require action in all sector economy, including:

- Investing in environmentally friendly technologies
- Supporting industry to innovate
- Rolling out cleaner, cheaper and healthier forms of private and public transport
- Decarbonising the energy sector
- Ensuring buildings are more energy efficient
- Working with international partners to improve global environmental standards
- Sustainable finance – all of which are strongly interlinked.

4.4.4 REPowerEU

In May 2022, the European Commission presented the REPowerEU Plan⁶, in response to the global energy market disruption caused by Russia's invasion of Ukraine. It puts forwards a set of actions to:

- Save energy;
- Diversify supplies;

⁶ European Commission. (2022). REPowerEU Plan https://eur-lex.europa.eu/resource.html?uri=cellar:fc930f14-d7ae-11ec-a95f-01aa75ed71a1.0001.02/DOC_1&format=PDF [Accessed 01/04/2026]

- Quickly substitute fossil fuels by accelerating Europe's clean energy transition;
- Smartly combine investments and reforms.

It states:

“Lengthy administrative procedures are one of the key barriers for investments in renewables and their related infrastructure. These barriers include the complexity of the applicable rules for site selection and administrative authorisations for projects, the complexity and duration of the assessment of the environmental impacts of the projects, grid connection issues, constraints on adapting technology specifications during the permit-granting procedure or staffing issues of the permit-granting authorities or grid operators. In order to accelerate the pace of deployment of renewable energy projects it is necessary to adopt rules which would simplify and shorten permit-granting processes.”

In 2023, the EU reached a 24.5%⁸ share of its gross final energy consumption from renewable sources – down from 23.08% in 2022. This still leaves a long way to go to reach the increased target of 42.5%, with the aim to increase it to 45%, by 2030. In accordance with the REPowerEU Communication, in May 2022, the European Commission published a recommendation⁹ on speeding up permit-granting procedures for renewable energy projects, accompanied by guidance to help the Member States speed up permitting for renewable energy plants.

The recommendation was created in order to help Member States exploit all possibilities for acceleration that exist within the legislative framework. It proposes measures to streamline procedures at national level, addresses ambiguities in the application of EU legislation and sets out good practices in Member States. It recommends participatory approaches that involve local and regional authorities and providing authorities with the necessary resources so as to facilitate the timely realisation of locally adapted investments.

⁸ European Commission. (2023). https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Renewable_energy_statistics#Share_of_renewable_energy_more_than_doubled_between_2004_and_2020 [Accessed 01/04/2026]

⁹ European Union (2022). Communication from the Commission: C(2022)3219. Available at: [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=PI_COM:C\(2022\)3219&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=PI_COM:C(2022)3219&from=EN) [Accessed 01/04/2026].

Recommendations include:

*“Member States should ensure that the planning, construction and operation of plants for the production of energy from renewable sources, their connection to the electricity, gas and heat grid and the related grid itself and storage assets **qualify for the most favourable procedure available in their planning and permit-granting procedures** and are presumed as being in the overriding public interest and in the interest of public safety, in view of the legislative proposal amending and strengthening the provisions of Directive (EU) 2018/2001 related to administrative procedures and without prejudice to the Union law.”*

“Member States should establish clearly defined, accelerated and as short as possible deadlines for all the steps required for the granting of permits to build and operate renewable energy projects, specifying the instances where such deadlines may be extended and under which circumstances. Member States should establish binding maximum deadlines for all relevant stages of the environmental impact assessment procedure.”

4.4.5 Renewable Deployment Acceleration

Regulation 2022/2577

In recognition of the worsening energy crises arising from Russia's war against Ukraine, the Council of the European Union adopted Regulation (EU) 2022/2577 on 22 December 2022, laying down a framework to accelerate the deployment of renewable energy. This regulation applies to *“all permit-granting processes that have a starting date within the period of its application”* and includes a number of tangible measures aimed at streamlining the permit-granting process and facilitating the accelerated deployment of renewable energy. The period of application of the Regulation is 18 months from the 30 December 2022 and therefore applies to current EIAs. This validation period has since been extended by Regulation (EU) 2024/223 as outlined below in this section.

Central to the regulation is the rebuttable presumption that renewable energy developments are in the overriding public interest when addressing competing interests under the Habitats Directive, Birds Directive and the Water Framework Directive and that renewable energy projects should be given priority when balancing legal interests in a given case – Article 3:

(1) *The planning, construction and operation of plants and installations for the production of energy from renewable sources, and their connection to the grid, the*

related grid itself and storage assets shall be presumed as being in the overriding public interest and serving public health and safety when balancing legal interests in the individual case, for the purposes of Article 6(4) and Article 16(1)(c) of Council Directive 92/43/EEC, Article 4(7) of Directive 2000/60/EC of the European Parliament and of the Council and Article 9(1)(a) of Directive 2009/147/EC of the European Parliament and of the Council....

- (2) *Member States shall ensure, at least for projects which are recognised as being of overriding public interest, that in the planning and permit-granting process, the construction and operation of plants and installations for the production of energy from renewable sources and the related grid infrastructure development are given priority when balancing legal interests in the individual case¹¹ (emphasis added)*

The Regulation was introduced as a temporary, emergency measure and included provision for the EU Commission to review the application of, and continued need for, the measures included in the Regulation. The Commission completed its review of the Regulation and furnished its report to the Council on the 28 November 2023. In its report the Commission recommended the prolongation of the validity of certain measures in the Regulation, including Article 3(2), and by Regulation 2024/223 of the 22 December 2023 the Council of the European Union, Regulation 2022/2577 was extended and amended, with Article 3 applying to the all permit-granting processes commenced up to the 30 June 2025. This regulation (Regulation 2024/223) applies from 1 July 2024 and is relevant to this EIA.

The importance, continued need and effectiveness of Article 3(2) of Regulation 2022/2577 in aiding the accelerated deployment of renewable energy is explained in Recital 14 of Regulation 2024/223:

'Article 3(2) of Regulation (EU) 2022/2577 requires priority to be given to projects that are recognised as being of overriding public interest whenever the balancing of legal interests is required in individual cases and where those projects introduce additional compensation requirements for species protection... The first sentence of Article 3(2) of Regulation (EU) 2022/2577 has the potential, in the current urgent and still unstable energy situation on the energy market which the Union is facing, to further accelerate renewable energy projects since it requires Member States to promote those renewable energy projects by giving them priority when dealing with different conflicting interests beyond environmental

¹¹ [Official Journal of the European Union: https://eur-lex.europa.eu/oj/direct-access.html](https://eur-lex.europa.eu/oj/direct-access.html) [Accessed 01/04/2026]

matters in the context of Member States 'planning and the permit-granting 'process. The Commission's report demonstrated the value of the first sentence of Article 3(2) of Regulation (EU) 2022/2577 which recognises the relative importance of renewable energy deployment in the current difficult energy context beyond the specific objectives of the derogations foreseen in the Directives referred to in Article 3(1) of Regulation (EU) 2022/2577. Given the particularly severe situation in the supply of energy which the Union is currently facing, it is appropriate to prolong the application of Article 3(2) of Regulation (EU) 2022/2577 in order to appropriately recognise the crucial role played by renewable energy plants to fight climate change and pollution, reduce energy prices, decrease the Union's dependence on fossil fuels and to ensure the Union's security of supply in the context of the balancing of legal interests carried out by permit-granting authorities or national courts. At the same time, it is also appropriate to keep the environmental safeguard that, for projects recognised as being of overriding public interest, appropriate species conservation measures, underpinned by sufficient financial resources, are adopted. '

4.4.6 European Wind Power Action Plan

The European Commission published the European Wind Power Action Plan in October 2023. The European Union target of at least 42.5% renewables by 2030 will require installed wind capacity to more than double, from 204 GW in 2022 to over 500 GW in 2030. The Plan outlines a series of actions for the European Union, Member States and the industry that should take to achieve this objective and address current operating challenges. The Plan is divided into the following six pillars.

1. Acceleration of deployment through increased predictability and faster permitting

Actions under this pillar include accelerating permitting processes through digitalisation and training and enhancing cooperation between European Union wind energy forums. This pillar also promotes increased visibility of wind project pipelines, and the adoption of an action plan to facilitate the build-out of electricity grids.

2. Improved auction design

This pillar promotes the use of well-designed, objective, transparent, non-discriminatory pre-qualification and non-price award criteria in the auctions for the support of wind energy projects. The European Commission will propose a set of auction criteria covering concepts such as cyber security, sustainability, environmental protection and ability to deliver.

3. Access to finance

The Plan lays out several actions designed to facilitate access to European financing and encourage investment in the wind industry. In particular, the European Investment Bank will play a key role in providing funding, de-risking tools and counter-guarantees.

4. Creating a fair and competitive international environment

Actions under this pillar include the facilitation of access by European companies to foreign markets, increased protection of the internal market against trade distortions, and enhancement of standardisation in the wind energy sector.

5. Skills

Under this pillar, the European Commission will support large-scale skills partnerships that enhance skills development for the wind sector. It will also facilitate the launch of European net-zero industry skills academies as part of Member State reskilling and upskilling initiatives.

6. Industry engagement and Member State commitments

The final pillar calls on industry and Member States to take a more active role in matters such as hedging against inflation and price volatility of main manufacturing inputs, such as raw materials, and developing further long-term partnerships between wind manufacturers and operators.

4.4.7 The Clean Industrial Deal 2025

The deal is an umbrella strategy setting out concrete actions to turn decarbonisation into a driver of growth for European industries. This includes lowering energy prices, creating quality jobs and the right conditions for companies to thrive.

The deal presents measures to boost every stage of production, with a focus on:

- energy-intensive industries such as steel, metals, and chemicals, that urgently need support to decarbonise, switch to clean energy, and tackle high costs, unfair global competition, and complex regulations
- the clean-tech sector which is at the heart of future competitiveness and necessary for industrial transformation, circularity, and decarbonisation.

The main elements of the deal are:

- Affordable energy
- Boosting demand for clean products

- Financing the clean transition
- Circularity and access to material
- Acting on global scale
- Skills and quality jobs

4.4.8 Project Compliance with European Climate Legislation

The Proposed Development is compliant with EU policy and legislation as it contributes towards the goal of decarbonising the energy sector in the EU and increasing the supply of renewable energy sources. Ireland missed its 2020 renewable energy share (RES) target as part of RED I, achieving 13.5% instead of the target 16%, meaning that Ireland was obligated to acquire statistical transfers of 3.3 TWh of renewable energy from other Member States to compensate for this shortfall. The latest figures show Ireland's progress towards the overall RES targets is slow, with 2021 shares at 12.5%, 2022 shares at 13.1% and 2023 shares at 15.3%. Ireland's overall RES target has now increased to 43.0% in 2030 as part of RED III, this shows Ireland is currently at a shortfall of 27.7%. The Proposed Development will have an installed capacity of c. 68.8 MW MEC of renewable electricity which would contribute towards the RED III targets for 2030 and help to prevent further requirements to acquire statistical transfers from other Member States.

4.5 NATIONAL, REGIONAL AND LOCAL CLIMATE POLICY AND LEGISLATION

This section sets out the key planning policies from a national, regional and local plan perspective. **Plate 4.1** provides an overview of National Planning Policy Context in Ireland.



Plate 4.1: Hierarchy of Plans in Ireland

The National Planning Framework is assessed in **Section 4.5**. The Regional Spatial and Economic Strategy is assessed in **Section 4.6.1**. The relevant County Development Plan is assessed in **Section 4.6.2**. The Proposed Development is not located in a Local Area plan.

4.5.1 National Climate Policy and Legislation

4.5.1.1 Project 2040

Project Ireland 2040 is the Irish government's long-term strategy for the social, economic, and cultural development of the country, combining the National Planning Framework (NPF) (see **Section 4.5.1.2**) and the National Development Plan (NDP) (see **Section Error! Reference source not found.**). Its goal is to create a better, fairer, and more sustainable Ireland by investing in infrastructure, public services, and cultural amenities to accommodate a projected one million increase in the population by 2040. This involves promoting balanced regional growth, fostering compact urban development, and improving environmental sustainability for all citizens.

4.5.1.2 National Planning Framework (NPF)

Ireland's National Planning Framework (NPF) is the 20-year National Spatial Strategy, which provides a high-level, strategic vision for the sustainable growth and development of the country's urban and rural areas to the year 2040. Alongside the National Development Plan (NDP), it forms Project Ireland 2040, the overarching framework for the nation's social, economic, and cultural development, aiming to manage population growth and ensure balanced, compact, and sustainable development.

Section 1.5 of the NPF sets out that *“sustainability is at the heart of long-term planning and the National Planning Framework seeks to ensure that the decisions we make today, meet our own needs without compromising the ability of future generations to meet their needs.”*

The NPF with the NDP sets the context for each of Ireland's three regional assemblies to develop their Regional Spatial and Economic Strategies (RSES) taking account of and coordinating Local Authority County and City Development Plans in a manner that will ensure national, regional and local plans align. The NPF is based on a set of values that will ensure Ireland's “long term economic, environmental and social progress for all”.

On the 8th of April 2025, the Government approved the revised National Planning Framework – First Revision April 2025 (NPF 2025) which, subject to the approval of both

Houses of the Oireachtas, firmly sets the direction for Ireland's growth and development to 2040. It sets a new spatial policy for the country with a view to addressing critical priorities, in particular housing, infrastructure and climate.

The NPF 2025 sets a number of shared goals for Ireland which the Proposed Development will contribute to achieving, including:

- Strengthened rural economies and communities
- A strong economy, supported by enterprise, innovation and skills
- Transition to a carbon neutral and climate resilient society

Implementing the NPF is focused on policies, actions and investment to deliver 10 National Strategic Outcomes. National Strategic Outcome 8 (NSO 8) relates to Transition to a Carbon Neutral and Climate Resilient Society. NSO 8 includes:

- *“Deliver 80% of our electricity needs from renewable sources by 2030 with a strategic aim to increase renewable deployment in line with EU targets and National policy objectives out to 2030 and beyond. It is expected that this increase in renewable deployment will lead to a greater diversity of renewable technologies in the mix.*
- *Reinforce the distribution and transmission network to facilitate planned growth and distribution of a more renewables focused source of energy across the major demand centres.”*

Chapter 9 (Climate Transition and Our Environment) of NPF 2025 states that:

“The Government has committed to achieving targets underpinned by the adoption of a series of carbon budgets and national Climate Action Plans over the period to 2050, informed by UN and EU policy. These actions are also underpinned by other key national policies including the National Development Plan, National Adaption Framework and by Sectoral Adaptation Plans.

In addition to legally binding targets agreed at EU level, it is a national objective for Ireland to transition to be a competitive zero carbon, economy no later than 2050.

The NPF 2025 includes numerous National Policy Objectives (NPOs), the following of which are relevant to the Proposed Development:

National Policy Objective 69

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

National Policy Objective 70

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

National Policy Objective 71

“Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development.”

National Policy Objective 74

Each Regional Assembly must plan, through their Regional Spatial and Economic Strategy, for the delivery of the regional renewable electricity capacity allocations indicated for onshore wind and solar reflected in Table 9.1 below, and identify allocations for each of the local authorities, based on the best available scientific evidence and in accordance with legislative requirements, in order to meet the overall national target.

| Region | Energised capacity 2023 (MW) | Additional Renewable Power Capacity Allocations (MW) | Total % of National Share in 2030 | Energised Capacity 2023 (MW) | Additional Renewable Power Capacity Allocations (MW) | Total % of National Share in 2030 |
|----------------------|------------------------------|--|-----------------------------------|------------------------------|--|-----------------------------------|
| | Onshore Wind | | | Solar PV | | |
| Eastern and Midlands | 284 | 1,966 | 25% | 306 | 3,294 | 45% |
| Northern and Western | 1,761 | 1,389 | 35% | 0.3 | 959 | 12% |
| Southern | 2,622 | 978 | 40% | 138 | 3,302 | 43% |
| Total | 4,667 | 4,333 | | 445 | 7,555 | |

Plate 4.2: Regional Renewable Electricity Capacity Allocations

National Policy Objective 75

Local Authorities shall plan for the delivery of Target Power Capacity (MW) allocations consistent with the relevant Regional Spatial and Economic Strategy, through their City and County Development Plans.

In order to facilitate the accelerated deployment of renewable electricity infrastructure and to achieve the national targets outlined in the Climate Action Plan 2025, the NPF 2025 establishes regional renewable energy capacity allocations (see NPO 74 above). These allocations are to be embedded within the Regional Spatial and Economic Strategies (RSES) and the corresponding Regional Renewable Energy Strategies, and subsequently disaggregated into county-level targets to inform the preparation of city and county development plans. The additional renewable power capacity allocation for onshore wind for the Northern and Western Region is 1,389 MW.

4.5.1.3 National Development Plan

The NDP sets out the framework and broad direction for investment priorities and provides indicative Exchequer allocations to support the delivery of projects to further the ten National Strategic Outcomes (“NSOs”) identified in the National Planning Framework:

1. Compact Growth
2. Enhanced Regional Accessibility
3. Strengthened Rural Economies and Communities
4. Sustainable Mobility
5. A Strong Economy, supported by Enterprise, Innovation and Skills
6. High-Quality International Connectivity
7. Enhanced Amenity and Heritage
8. Transition to a Climate-Neutral and Climate Resilient Society
9. Sustainable Management of Water and other Environmental Resources
10. Access to Quality Childcare, Education and Health Services

The NDP 2021-2030 provides for unprecedented investment in climate action, earmarking specific investment for low-carbon, resilient electricity systems; energy infrastructure and energy efficient housing. The NDP commits to increasing the share of renewable electricity up to 80% by 2030, with the collective spend by State-owned enterprises expected to be in excess of €16 billion in energy related projects between 2021 and 2030. The core Strategic Investment Priorities related to energy are listed in **Table 4.2** below:

Table 4.2: Energy Related Strategic Investment Priorities

| National Strategic Outcome | Strategic Investment Priorities |
|--|--|
| <p>NSO 6: High Quality International Connectivity</p> | <ul style="list-style-type: none"> • Offshore Renewable Energy Infrastructure (The Department of Transport has successfully negotiated with the European Commission to make funding for Offshore Renewable Energy infrastructure at ports eligible under the Connecting Europe Facility programme in the next 2021-2023 funding stream. There will be three calls for applications in this period. The Department of Transport is engaging with ports on the Trans European Network for Transport (Ten-T) to assist where appropriate in applying for this funding.) |
| <p>NSO 8: Transition to a Climate-Neutral and Climate-Resilient Society</p> | <ul style="list-style-type: none"> • Renewable energy (Regular Renewable Electricity Support Scheme (RESS)) auctions will deliver competitive levels of onshore wind and solar electricity generation which indicatively could be up to 2.5 GW of grid-scale solar and up to 8 GW of onshore wind by 2030. The RESS auctions will also support the delivery of up to 5 GW of additional offshore renewable electricity generation by 2030.) • Energy efficiency (€5 billion in additional carbon tax receipts over the period of the NDP have been allocated to increase capital investment levels in energy efficiency and implement the National Retrofit Plan which is to be published later this year) • State owned enterprise investment in the National Smart Energy Metering Programme, and the national electricity system (including transmission cables and substations, to link renewable electricity generation to electricity consumers and to accommodate higher levels of renewables on the electricity system and |

| National Strategic Outcome | Strategic Investment Priorities |
|----------------------------|---|
| | <p>reinforcement of the natural gas network by system operators EirGrid, ESB Networks and Gas Networks Ireland)</p> <ul style="list-style-type: none"> • State owned enterprise investment and commercial sector investment in security of supply (The Government has pledged to support enhanced electricity interconnection, eg through the Celtic Interconnector to France and further interconnection to the UK; and to facilitate delivery of circa 2 GW of new conventional (mainly gas-fired) electricity power plants to support a predominantly wind/solar powered electricity system. The collective spend by State-owned enterprises is expected to be in excess of €16 billion in energy related projects between 2021 and 2030.) |

4.5.1.4 *Climate Emergency*

On 29th November 2019 the European Parliament declared a climate emergency ahead of the UN COP 25 in Madrid in December 2019. In May 2019, the Oireachtas declared a “climate emergency” in an amendment to the report ‘Climate Action: A cross-party consensus for action’ which followed the recommendations of the Citizens Assembly on Climate Action. This was followed by the publication of the Cross-Departmental Climate Action Plan 2019 on 17th June 2019, revised in 2021, 2023, 2024 and 2025.

4.5.1.5 *Climate Action and Low Carbon Development (Amendment) Act 2021*

At a national level, the Climate Act commits Ireland to reach a legally binding target of net-zero emissions no later than 2050, and a cut of 51% by 2030 (compared to 2018 levels). It establishes a framework with clear, legally binding targets and commitments, and ensures the necessary structures and processes are embedded on a statutory basis to achieve Ireland’s national, EU and international climate goals and obligations in the near and long term.

When exercising its decision-making powers under the PDA 2000 planning authorities and the Commission are obliged under section 15 of the Climate Act to:

“in so far as practicable, perform its functions in a manner consistent with—

- (a) the most recent approved climate action plan,*
- (b) the most recent approved national long term climate action strategy,*
- (c) the most recent approved national adaptation framework and approved sectoral adaptation plans,*
- (d) the furtherance of the national climate objective, and*
- (e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.”*

The National Climate Policies and Objectives listed in section 15, with which the Commission must comply, all support the development of wind energy projects and associated grid connections in accordance with proper planning and sustainable development.

The Supreme Court gave judgment in *Coolglass Wind Farm Limited v the Commission*¹² on 4th February 2026. It has clarified how climate obligations must be taken into account by planning authorities when making planning decisions. The Court confirmed that planning authorities have a legal obligation to ensure that any decision to grant or refuse planning permission is consistent with the climate objectives set out under section 15(1) of the Climate Action and Low Carbon Development Act 2015. The Court emphasised that departure from climate objectives is permissible only where there are genuine practical difficulties that make full alignment impracticable. A departure cannot be justified by convenience alone.

The Proposed Development, if granted, would clearly contribute to climate targets.

There are no mandatory and non-flexible legal requirements that prevent the Commission from reaching an outcome, in relation to the Proposed Development, that favours policy goals, i.e. granting permission. The Proposed Development is supported by local, regional and policy and will be constructed and operated in accordance with national guidance and

¹² https://www2.courts.ie/view/judgments/dc8d9a6e-345e-4ce5-ab15-314fd87b5ef3/6a4cdf55-2c78-4548-b2cb-bd0f4a84e0a2/2026_IESC_5_O'Donnell%20CJ.pdf/pdf

best practice. It has also been demonstrated, in the EIAR and NIS, that the Proposed Development will not give rise to any significant effect on the environment or have an adverse effect on the integrity of European Sites. With these matters considered, it is respectfully submitted that the Commission is obliged to exercise their evaluative judgement to reach an outcome favouring policy goals, in accordance with their obligation under section 15 of the Climate Act and grant permission.

The Climate Act also includes the following key elements:

- It places on a statutory basis a 'national climate objective', which commits Ireland to pursue and achieve no later than 2050, the transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy.
- It embeds the process of carbon budgeting into law. Governments are required to adopt a series of economy-wide five-year carbon budgets, including sectoral targets for each relevant sector, on a rolling 15-year basis, starting in 2021.
- Actions for each sector will be detailed in the Climate Action Plan, updated annually (see **Section 4.5.1.6**).
- A National Long Term Climate Action Strategy will be prepared every five years.

A recent report from the EPA Ireland's Greenhouse Gas Emissions Projections¹³ found that Ireland is not on track to meet the 51 per cent emissions reduction target (by 2030 compared to 2018), indicating that further measures are needed.

4.5.1.6 Climate Action Plan 2025

The Climate Action Plan 2025¹⁵ (CAP2025) was published in April 2025 and is the latest assessment and measurement of what has been achieved over the past year, building on actions taken in 2024. It sets out what needs to be done in 2025, so Ireland is prepared to take on the challenges of our second carbon budget period 2026-2030.

CAP 2025 notes Ireland's progress to date:

- In 2023 emissions reduced by nearly 7% against 2022 levels
- Compared with the same period in 2023, emissions in the first half of 2024 reduced by 3.5%

¹³ EPA 2023. <https://www.epa.ie/our-services/monitoring--assessment/climate-change/ghg/> [Accessed 02/04/2026]

¹⁵ Department of Communications, Climate Action and Environment. (2025). Climate Action Plan 2025.

<https://www.gov.ie/en/department-of-the-environment-climate-and-communications/publications/climate-action-plan-2025/> [Accessed 02/04/2026]

- Emissions from the electricity sector in the first half of 2024 were down over 17%
- Irish wind farms generated nearly 40% of Ireland's total electricity demand in the first half of 2024
- Over the past year, emissions in agriculture have reduced by over 4%
- In the built environment, emissions have decreased by 21% since 2018
- In transport, emissions increased by 0.3% in 2023

CAP 2025 re-affirms the previous commitment to increasing the share of renewable electricity to 50% by 2025 and 80% by 2030. Overall, the share of renewable electricity generation in Ireland increased from 38.6% to 40.7% from 2022 to 2023. The figure for 2024 will likely be between 40% and the interim, end of year target of 50% set out in CAP 2025.

The targets¹⁶ are:

- onshore wind, 6GWs by 2025 and 9 GWs by 2030
- offshore wind, at least 5GWs by 2030
- solar, up to 5GW by 2025 and 8GW by 2030

These targets are unchanged for the previous two years. CAP 2025 states under section 11.2 Actions and Updates:

“A renewables-led system is at the core of Ireland's plan to radically reduce emissions in the electricity sector, protect our energy security, and ensure our economic competitiveness. This requires the accelerated and increased deployment of new renewable electricity generation capacity and related infrastructure.”

4.5.1.7 National Energy & Climate Plan 2021-2030

The National Energy and Climate Plan (NECP)¹⁸ is a ten-year integrated document mandated by the European Union to each of its member states in order for the EU to meet its overall greenhouse gases emissions targets.

The plan establishes key measures to address the five dimensions of the EU Energy Union;

¹⁶ See page 87 of https://assets.gov.ie/static/documents/c491032e/DECC_Climate_Action_Plan_2025_Main_Report_-_Final_Web.pdf

¹⁸ Department of Communications, Climate Action and Environment. (2021). National Energy and Climate Plan https://energy.ec.europa.eu/system/files/2020-08/ie_final_necp_main_en_0.pdf [Accessed 02/04/2026]

- 1) Decarbonisation: GHG emissions and removals and Renewable Energy
- 2) Energy efficiency
- 3) Energy security
- 4) Internal energy market
- 5) Research, innovation and competitiveness

Key, relevant renewable energy objectives include:

- Reduce fossil fuel use from 64% of final consumption in 2021 to 45% by 2025 and further by 2030.
- Accelerate delivery of onshore wind, offshore wind and solar to reach 80% of electricity generated from renewable sources to by 2030 underpinned by the Renewable Electricity Support Scheme (RESS).
- Support efforts to increase indigenous renewable sources in the energy mix, including wind, solar and bioenergy.
- Facilitate infrastructure projects, including private sector commercial projects, which enhance Ireland's security of supply and are in keeping with Ireland's overall climate and energy objectives.
- Increase onshore wind capacity to 9 GW
- Streamline consenting and connection arrangements.
- Phase-out of coal and peat-fired electricity generation

According to a report published by the Environmental Protection Agency (EPA) in June 2023, Ireland will achieve a reduction of only 29% in its greenhouse gas emissions by 2030, far short of a legally binding target of 51%. Almost all sectors are on a trajectory to exceed their national ceilings – including agriculture, industry, electricity and transport. The EPA report warns that the 2030 targets can only be reached by “implementing policies that deliver emission reductions across all sectors of the economy in the short term”.¹⁹

4.5.1.8 National Energy Security Framework 2022

In April 2022, the Government of Ireland issued the National Energy Security Framework²⁰ in response to the European Commission's REPowerEU action statement. It provides a

¹⁹ Environmental Protection Agency. (2023) Ireland's Greenhouse Gas Emissions Projections.

https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA-GHG-Projections-2022-2040_Finalv2.pdf 08/02/2024 [Accessed: 02/04/2026]

²⁰ Government of Ireland. (2022) National Energy Security Framework. <https://assets.gov.ie/221399/86cb99f5-58e3-4821-bc4c-e1bb1fa706fb.pdf> [Accessed: 02/04/2026]

single overarching and initial response to address Ireland's energy security needs in the context of the war in Ukraine. It sets out how Ireland is seeking to phase out dependency on Russian gas, oil and coal imports as soon as possible, emphasising throughout the urgency of the need to secure Ireland's energy supply.

It is focused on three areas of work:

- Reducing demand for fossil fuels, which would seek to reduce overall demand for oil, natural gas and coal in Ireland.
- Replacing fossil fuels with renewables, which would seek to reduce the use of gas, oil and coal in Ireland by replacing it with renewable energy sources such as wind energy, solar energy or bioenergy.
- Diversifying fossil fuel supplies, which would seek to replace any Russian supplies of gas, oil and coal (direct or indirect) with supplies from other sources.

The framework highlights the impact of the Russian invasion of Ukraine on energy security, consumer price wise in the short term and how and where energy is sourced to ensure long term system resilience. It notes that:

"The war has highlighted key dependencies in our energy system which can no longer be relied on and has led to affordability issues for many consumers and businesses".

The framework builds on the idea of energy security as the uninterrupted availability of energy sources at an affordable price and is a response to the challenges of ensuring the ongoing and long-term security of affordable energy supply.

Ireland has one of the highest rates of importing fuel in Europe with imported dependency at 78% in 2023, according to the latest report published by SEAI²¹. Energy demand in Ireland has been growing and is expected to continue to increase by 37% to 2031²². Increases to the cost of carbon, supply issues and potential political insecurity increases fossil fuel price volatility. The high rate of imported fossil fuel dependency and the increasing demand for electricity make it vital to introduce more domestic renewable

²¹. SEAI (2024). Energy In Ireland. Available at: <https://www.seai.ie/sites/default/files/publications/energy-in-ireland-2024.pdf> [Accessed: 02/04/2026]

²² EirGrid. (2022). Ireland Capacity Outlook 2022-2031. Available at: chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://cms.eirgrid.ie/sites/default/files/publications/EirGrid_SONI_Ireland_Capacity_Outlook_2022-2031.pdf. [Accessed: 02/04/2026]

energy generation plants, such as the Proposed Development which could provide reliable, secure and affordable energy supplies in Ireland.

4.5.1.9 Energy Security in Ireland to 2030

Energy Security in Ireland to 2030 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. This report is being published as part of an Energy Security Package, containing a range of supplementary analyses, consultations, and reviews, which have informed the recommendations and actions related to energy security.

Informed by the Government's energy security policy objectives - to ensure energy is affordable, sustainable, and secure - the review considered the risks to oil, natural gas, and electricity. The report sets out that Ireland's future energy will be secure by moving from an oil and gas-based energy system to an electricity-led system, maximising our renewable energy potential, flexibility and being integrated into Europe's energy systems. Meeting our climate, renewable, and energy efficiency targets through actions and measures set out in the annually updated Climate Action Plan will deliver this secure energy future.

As we transition, the Energy Security Package states that we must ensure energy security is prioritised, monitored, and reviewed regularly, and includes a range of measures to implement this approach in the short and medium term by prioritising:

- Reduced and Responsive Demand
- A Renewables-Led System
- More Resilient Systems
- Robust Risk Governance

Under each of these four areas of actions, the report sets out a range of mitigation measures, including the need for additional capacity of indigenous renewable energy, but also energy imports, energy storage, fuel diversification, demand side response, and renewable gases. The governance structures supporting the energy system, including oversight and accountability reforms, were also examined.²³

²³ Department of Climate, Energy and the Environment (2023). Energy Security in Ireland to 2030 Energy Security Package. Available at: <https://www.gov.ie/en/publication/5c499-energy-security-in-ireland-to-2030/> [Accessed: 02/04/2026].

4.5.1.10 Department of Communications Climate Action and Environment: Renewable Electricity Support Scheme 2018 (RESS)

The Renewable Electricity Support Scheme (RESS) provides support to renewable electricity projects in Ireland. With a primary focus on cost effectiveness, the RESS delivers a broader range of policy objectives, including:

- Enabling communities to participate in renewable energy projects
- Increasing renewable technology diversity
- Delivering an ambitious renewable electricity policy to 2030
- Increasing energy security, energy sustainability and ensuring the cost effectiveness of energy policy

It has been designed to promote investment in renewable energy generation to support the growth of the green economy, create sustainable work opportunities, and ultimately benefit the consumer as renewables become more cost effective. The Programme for Government commits to hold RESS auctions at frequent intervals throughout the lifetime of the scheme. This will allow Ireland to take advantage of falling technology costs and avoid 'locking in' higher costs for consumers. If consented the Proposed Development will also provide a community fund calculated in accordance with the Renewable Electricity Support Scheme (RESS) Terms and Conditions at €2 per MWh of electricity produced by the project. This is to be made available to the local community for the duration of the RESS (15 years).

The delivery of the fourth onshore RESS auction in 2024, RESS 4, was seen as a pivotal component of meeting Ireland's ambitious targets of 80% renewable electricity (RES-E) by 2030.

2,071 GWh of renewable generation was provisionally successful in last year's auction, which was a significant improvement from the previous year's RESS 3 auction result, which delivered less than half of the minimum 2,000 GWh target..

EirGrid has now published the provisional results of the RESS 5 auction.

Statistics to note arising from the provisional results, include:

1. A total of 33 projects applied to participate in the RESS 5 qualification process. Of these applications, 23 projects qualified and ten projects have been provisionally unsuccessful in the auction.

2. The average strike price for the provisionally successful applicants across all projects was €98.81/MWh (up from €96.85/MWh in RESS 4). The average strike price for solar projects was €100.63/MWh (down from €104.76/MWh in RESS 4) and for wind projects was €96.56/MWh (up from €90.47/MWh in RESS 4).
3. Of the qualifying projects, 23 bids have been provisionally designated as successful (a combined total capacity of 1079.22MW), consisting of 18 solar projects (with a total capacity of 860.38MW) and 5 onshore wind projects (with a total capacity of 218.84MW).

RESS 5 included modifications in the Community Benefit Funds under RESS, which includes potential changes in the Terms and Conditions for RESS 5 include:

- Near Neighbour Payments for Onshore Wind: fixed amount and distances, eligibility and cap on overall spending,
- Relationship with Local Authorities mandated Funds,
- Role and selection of the Fund Committee,
- Simplified structure for smaller CBFs,
- Administration: limit on cost and requirements for the role
- Transparency

The Programme for Government commits to continue holding RESS auctions at frequent intervals throughout the lifetime of the scheme. This will allow Ireland to take advantage of falling technology costs and avoid 'locking in' higher costs for consumers. It is understood that RESS 6 will follow similar timelines to those of RESS 5.

4.5.1.11 Project Compliance with National Climate Policy

The Proposed Development will generate renewable energy, reducing Ireland's carbon footprint by displacing fossil fuels and contributing to national climate policy mitigation objectives. The Proposed Development meets the objectives of Project Ireland 2040 as it will contribute to the economic, environmental, and social objectives of the NPF, in particular National Policy Objectives 69 & 70. CAP 2025 re-affirms the previous commitment to increasing the share of renewable electricity to 50% by 2025 and 80% by 2030. The latest figures show that renewable electricity (RES-E) accounted for 40.4% of Ireland's total electricity generation in 2023, leaving a 39.6% gap to reach the 2030 target set under the Climate Action Plan 2025. In support of the CAP 2025 objectives, the Proposed will contribute to the de-carbonisation of the Irish electricity network by producing an estimated 210.9 GWh of renewable electricity per annum, contributing to the

Government's 80% renewable electricity target by 2030. This will help to mitigate climate change by reducing the emissions related to energy production and will help to decarbonise multiple sectors.

4.5.2 Regional and County Policy

4.5.2.1 Regional Spatial and Economic Strategy

The Regional Spatial and Economic Strategy (RSES) for the Northern and Western Regional Assembly (NWRA)

The Regional Spatial and Economic Strategy (RSES) for the Northern and Western Regional Assembly (NWRA) was adopted in December 2019. The objective of the RSES is to support the implementation of the National Planning Framework – Ireland 2040 and the economic policies and objectives of the Government by providing a long-term planning and economic framework which shall be consistent with the NPF and the economic policies or objectives of the Government.

The RSES provides a development framework of the region that supports the implementation of the National Planning Framework (NPF) and the relevant economic policies and objectives of the Government. It provides a 12-year strategy for the period 2020 – 2032 to achieve the objectives and vision of the regional assembly.

Among the Regional Policy Objectives (RPOs) are RPO 4.17, 4.18 and 4.18 which state the following in relation to renewable energy:

RPO 4.17: *To position the region to avail of the emerging global market in renewable energy by:*

- Stimulating the development and deployment of the most advantageous renewable energy systems
- Supporting research and innovation
- Encouraging skills development and transferability
- Raising awareness and public understanding of renewable energy and encourage market opportunities for the renewable energy industry to promote the development and growth of renewable energy businesses
- Encourage the development of the transmission and distribution grids to facilitate the development of renewable energy projects and the effective utilisation of the energy generated from renewable sources having regard to the future potential of the region over the lifetime of the Strategy and beyond.

RPO 4.18: *Support the development of secure, reliable and safe supplies of renewable energy, to maximise their value, maintain the inward investment, support indigenous industry and create jobs.*

RPO 4.19: *Support the appropriate development of offshore wind energy production through the adequate provision of land-based infrastructure and services, in line with national policy and in a manner that is compatible with environmental, ecological and landscape considerations.*

The RSES recognises that the northwest region has a rich natural energy resource, declaring that the region is open to renewables energy ideas, and recognises the required transition from fossil fuels to the use of renewables. The strategy further notes that this can contribute to new employment, community sustainability and attract additional people to the region.

The RSES has been informed by an Environmental Report that has been prepared in accordance with the SEA Directive and the Planning and Development (Strategic Environmental Assessment) Regulations S.I. No. 436/2004 (as amended), accompanied by a Regional Flood Risk Appraisal Report. Section 8.3 of the document outlines how the electrical grid network in the region must develop to accommodate diverse renewable energy resources²⁸.

4.5.2.2 Project Compliance with Regional Policy

The RSES recognises and supports many opportunities for onshore wind as a major source of renewable energy. It states that opportunities for both commercial and community wind energy projects should be harnessed, having regard to the requirements of WEDGs 2006. Wind Energy, with current and future developments technology, has an important role in delivering and clean electricity for Ireland. As a form of sustainable energy with an output potential of c. 68.8 MW of installed capacity at the Wind Farm Site, the Proposed Development will contribute significantly to renewable energy targets and the strategy supported in the RSES for the NWRA.

²⁸ Northern and Western Regional Assembly (2020). Regional Spatial and Economic Strategy 2020-2032. Available at: <https://www.nwra.ie/rses/> [Accessed 02/04/2026].

The Proposed Development is fully aligned with regional climate and renewable energy policy objectives, as it not only facilitates the integration of renewable energy into the electricity transmission grid but also safeguards strategic energy corridors from encroachment by other developments that could comprise the delivery of energy networks. By adhering to regional policy objectives, the Proposed Development ensures sustainable and timely delivery of renewable energy while supporting the region's long-term energy needs at local, regional and national scales.

The construction of the Proposed Development will also positively contribute to the regional economy bringing investment and jobs that will help to support and retain confidence in the key regional industries of construction and renewable energy.

4.5.3 Local Policy

4.5.3.1 Mayo County Development Plan 2022 – 2028

The Mayo County Development Plan 2022-2028 (“the CDP”) was adopted on 29 June 2022. The CDP presents an extensive list of policies regarding development management within the County. The Mayo CDP 2022-2028 Vision of County Mayo states that:

‘To create a sustainable and competitive county that supports the health and well-being of the people of Mayo, providing an attractive destination, as a place in which to live, work, invest, do business and visit, offering high quality employment and educational opportunities within strong and vibrant sustainable communities, whilst ensuring a transition to a low carbon and climate resilient county that supports high environmental quality.’

The CDP states that: *‘This plan provides for, and manages, the physical, economic, and social development of the County, in the interests of the overall common good, and in compliance with environmental legislation’.*

The given policies from the CDP are given for ease of reference and are thought those most relevant to this type of development. Individual technical assessments included with the EIAR will also refer to CDP policies where relevant.

The key CDP policies considered to be relevant to the EIAR Development include:

Energy Infrastructure

Chapter 11 of the Mayo CDP focuses on climate action and renewable energy for County Mayo. The plan refers to its objective to reduce the carbon output, energise Mayo through renewable means and mitigate the effects of climate change. The CDP recognises the potential that renewable energy sources can offer from within the County and included amongst these, is wind generation. A range of energy and renewable energy policies and objectives are identified in Chapter 11 of the CDP and included in these, relevant to the Proposed Development, are the following:

Table 4.3: Key Policies from The County Development Plan (CDP) Mayo 2022 – 2028 relevant to the Proposed Development type.

| Objective/ Policy | Statement of Compliance |
|--|---|
| <p>CAO 1: <i>To support and advance the provision of renewable energy resources and programmes in line with the Government's National Renewable Energy Action Plan (NREAP), the Governments' Energy White Paper "Ireland's Transition to a Low Carbon Energy Future" (2015-2030) and any other relevant policy adopted during the lifetime of this plan.</i></p> | <p>All Government policies and legislations will be adhered to during the Proposed Development's construction, operation and decommissioning phases.</p> |
| <p>CAP 9: <i>To support Ireland's renewable energy commitments outlined in national policy by facilitating the development and exploitation of all appropriate renewable energy sources at suitable locations within the county, where such development does not have a negative impact on the surrounding environment (including water quality), landscape, biodiversity or local amenities, so as to provide for</i></p> | <p>The Proposed Development meets the objectives set down in policy CAP 9, by providing renewable energy where there is a pressing need to meet the national 80% renewable electricity target by 2030 as set out in the Climate Action Plan 2023. The Wind Farm has excellent wind resources as evidenced by site investigations. It is clear from the findings of the EIAR and the NIS that the Proposed Development is a suitable location.</p> |

| Objective/ Policy | Statement of Compliance |
|---|---|
| <p><i>further residential and enterprise development within the county.</i></p> | <p>Effects to the Environment are assessed throughout the EIAR. Chapter 9 Hydrology and Hydrogeology assesses water quality, the findings demonstrate the environment can accommodate the Proposed Development without giving rise to significant impacts to hydrology or hydrogeology, including water quality.</p> <p>Biodiversity; This is fully assessed in Chapter 6 Biodiversity and Chapter 7 Ornithology. The findings demonstrate that the environment can accommodate the Proposed Development without giving rise to significant biodiversity impacts.</p> <p>Local Amenities and Landscape; In Chapter 12 of the EIAR the Landscape and Visual assessment concluded that the Proposed Development would not give rise to any significant landscape or visual amenity effects (including residential amenity). The EIAR L&V chapter also considered effects upon “views and prospects” included in the Mayo County Development Plan 2022-2028. The findings demonstrate that the landscape can accommodate the Proposed Development without giving rise to significant effects.</p> <p>Further enterprise development; In Chapter 5 Population and Human Health the socio-economic impacts of the development are assessed. The Proposed Development has been assessed as having the potential to result in effects of a slight positive, long-term impact overall.</p> |

| Objective/ Policy | Statement of Compliance |
|---|---|
| <u>Renewable Energy Objectives</u> | |
| REO 2: <i>To examine options to ensure that community benefits are derived from renewable energy development in the County.</i> | The Proposed Development at Tirawley, under the legal entity name Constant Energy Limited will have a community benefit fund. |
| REO 3: <i>To encourage and facilitate, where possible, the production of energy from established and emerging renewable technologies.</i> | The Proposed Development will produce energy from renewable wind energy generators. |
| REO 4: <i>To support and implement the recording and monitoring of renewable energy potential in the county in partnership with other stakeholders including the Sustainable Energy Authority of Ireland (SEAI).</i> | The Proposed Development will connect into the National Grid to export the energy produced. |
| REO 6: <i>To ensure all renewable energy proposal comply with the provisions of the Mayo County Council Renewable Energy Strategy 2011-2020 (or as updated).</i> | The Proposed Development will comply with provisions outlined in the Mayo County Council Renewable Energy Strategy 2011 – 2020. |
| REO 8: <i>To encourage the development of wind energy, in accordance with Government policy, and having regard to the Landscape Appraisal of County Mayo and the Wind Energy Development Guidelines (2006) and Mayo Renewable Energy Strategy, or any revisions there of or future guidelines, and ensure consistency with the provisions of RPO 4.16 and RPO 5.2(b) of the RSES (2020-2032).</i> | <p>All Government and County policies, guidelines and legislations will be adhered to during the Proposed Development's construction, operation and decommissioning phases.</p> <p>The Wind Farm Site was selected in line with the existing policies and guidelines.</p> |

| Objective/ Policy | Statement of Compliance |
|--|---|
| <p>REO 22: <i>To promote the use of efficient energy storage systems and infrastructure that supports energy efficiency and renewable energy system optimisation, in accordance with proper planning and sustainable development.</i></p> | <p>The Proposed Development will have 150 MW BESS. This optimises renewable energy integration by capturing excess power during peak generation and discharging it during periods of high demand, directly supporting grid efficiency and sustainable resource management. By implementing this advanced storage solution, we adhere to proper planning standards that prioritise long-term energy reliability and the reduction of carbon emissions. This infrastructure aligns with national objectives to promote efficient energy practices and the strategic optimization of renewable energy systems.</p> |
| <p>REO 23: <i>To support and facilitate the achievement of the minimum renewable energy target of 600MW for County Mayo over the plan, and to review/revise this target to ensure consistency with any future renewable energy strategies for the Northern and Western Region</i></p> | <p>The Proposed Development will have an anticipated output of 68.8 MW which will contribute to the renewable energy target for County Mayo.</p> |
| <p><u>Renewable Energy Policies</u></p> | |
| <p>REP 1: <i>To support Ireland’s renewable energy commitments outlined in national policy by facilitating the development and exploitation of a range of renewable energy sources at suitable locations within the county, where such development does not have a negative impact on the surrounding environment (including water quality), landscape, biodiversity</i></p> | <p>The Proposed Developments contribution to this objective is outlined in objective CAP 9.</p> |

| Objective/ Policy | Statement of Compliance |
|---|---|
| <i>or local amenities to ensure the long-term sustainable growth of the county.</i> | |
| <p>REP 3: <i>To actively encourage and support the sustainable development, renewal and maintenance of energy generation infrastructure in order to maintain a secure energy supply, while protecting the landscape, archaeological and built heritage and having regard to the provisions of the Habitats Directive.</i></p> | <p>The Proposed Development supports this policy by contributing to renewable energy production. A full EIA has been undertaken on the Proposed Development to maximise positive benefits and minimise potential negative impacts on the environment, including built heritage while having regard to the Habitats Directive.</p> |
| Biodiversity & Environmental Strategy | |
| <p>NEO 8: <i>To maintain, protect and where possible enhance the natural heritage and biodiversity of bogs, fens and turloughs, where appropriate, in County Mayo.</i></p> | <p>The Proposed Development is located on agricultural lands. This habitat can be partially restored using the peat spoil from any excavations onsite. The Proposed Development will not spread beyond the outlined Redline Boundary, to protect the surrounding habitats from degradation.</p> |
| <p>NEO 9: <i>Recognise the importance, in terms of their natural heritage and biodiversity, of woodlands, tree lines, hedgerows, stonewalls, watercourses and associated riparian vegetation and the role they play in supporting bat populations and where possible developments will be encouraged to retain such features.</i></p> | <p>The Proposed Development is located at a distance from any ecologically important receptors in relation to bat populations.</p> |
| <p>NEO 11: <i>To ensure that the impact of development within or adjacent to national designated sites, Natural Heritage Areas, Ramsar Sites and</i></p> | <p>Buffer distances have been implemented in the design of the Proposed Site to ensure minimal/no effect on national designated sites, Natural Heritage Areas, Ramsar Sites and</p> |

| Objective/ Policy | Statement of Compliance |
|--|--|
| <p><i>Nature Reserves likely to result in significant adverse effects on the designated site is assessed by requiring the submission of an Ecological Impact Assessment report (EcIA), Environmental Report (ER), an Environmental Impact Assessment Report (EIAR), if deemed necessary, and/or a Natura Impact Assessment (NIS), if deemed necessary, prepared by a suitably Mayo County Development Plan 2022-2028 qualified professional, which should accompany planning applications.</i></p> | <p>Nature Reserves. Further details can be found in Chapter 14 Cultural Heritage.</p> |
| <p>NEO 14: <i>To protect and enhance the ecological network throughout the county to improve the ecological coherence of the Natura 2000 network in accordance with Article 10 of the Habitats Directive.</i></p> | <p>The Proposed Development includes a Biodiversity Enhancement and Management Plan (BEMP) in Appendix 6.4 which provides methods of protection and enhancement of habitats within the Proposed Development.</p> |
| <p>NEO 27: <i>To ensure all development proposals are consistent with the Landscape Appraisal of County Mayo and the associated Landscape Sensitivity Matrix and future editions thereof.</i></p> | <p>The Proposed Development will comply with provisions outlined in the Landscape Appraisal of County Mayo and the associated Landscape Sensitivity Matrix.</p> |
| <p>NEO 29: <i>Require a Landscape/Visual Impact Assessment to accompany significant proposals, located within or adjacent to sensitive landscapes, where appropriate.</i></p> | <p>A Landscape and Visual Impact Assessment was carried out as part of this EIAR, details of which can be found in Chapter 12 Landscape and Visual Impact and Appendix 12.1 Landscape and Visual Impact Assessment Booklet.</p> |

4.5.3.2 *Mayo Renewable Energy Strategy*

The Renewable Energy Strategy for County Mayo 2011 – 2020 was adopted by Mayo County Council on 9th May 2011. The Mayo Renewable Energy Strategy 2011 – 2020 vision statement outlines:

“The renewable energy development vision for County Mayo is to harness the energy and economic potential of County Mayo presented by renewable technologies in order to provide benefits for both local communities and the global environment. In doing so, the elements of the natural, cultural (architectural and archaeological) and landscape heritage that define Mayo for local people and visitors alike will be protected. It is recognised, however, that change is an integral part of cultural heritage and that in order for communities and businesses to thrive Mayo needs new developments. Renewable energy projects will, therefore, be developed in ways that protect the integrity of environmentally designated sites; maximise local and regional benefits; and minimise or avoid negative impacts on the environment and society”.

The aim of the strategy is to develop the plan led approach to the location of renewable energy development at a more detailed level than that outlined in the Wind Energy Strategy (2008) and renewable energy policies and objectives of the Mayo CDP 2008-2014.

4.5.3.3 *Mayo RES Renewable Energy Potential Designated Areas*

Figure 4.2 shows the location of the Proposed Development Site on “Map 8 Renewable Energy Potential and Existing Infrastructure in County Mayo” of the Mayo RES.

The Proposed Development has a total of 16 no. turbines. Of the 16 no. turbines, 3 no. turbines are in a ‘Tier 1 Preferred Large Windfarms’ area, 8 no. turbines are within an area ‘Open for Consideration’ and 5 no. turbines are on a non-designated area. However, these 5 no. turbines are within 820 m of a designated area, as shown on **Figure 4.1**.

The areas of the Wind Farm Site that are located outside the designated areas are ‘unclassified’ and share the same characteristics as the portion within the classified lands. The RES states that applications for wind turbines in the ‘*Open for Consideration*’ areas are open to development, subject to conformance with all other requirements of the County Development Plan, including objectives relating to landscape protection and the protection of residential amenity. The rationale behind this is to minimise the impacts of large-scale developments on the environment of Co. Mayo, while maximising the potential for optimal and efficient renewable energy generation.

Section 6.4 of the Mayo RES makes provision for the Local Authority to consider all proposed renewable energy developments submitted through the planning system on a case-by-case basis, unless located on a Natura 2000 site.

Section 6.5, p52 of the Mayo RES 2011 - 2020 states the following:

“Notwithstanding the potential areas identified in this Strategy all proposed renewable developments will be assessed on the principles of proper planning and sustainable development, ensuring minimal adverse environmental impact, including flooding, and taking full account of the presence and requirement to protect all Natura 2000 sites and (proposed) Natural Heritage Sites. Projects will be subject to Habitats Directive Assessment where considered appropriate.”

During the EIA design process outlined in **Chapter 3: Alternatives Considered**, the location of the turbines was influenced by inputs from the hydrologist, ecologist, geologist, archaeologist, landscape and visual specialist. These included proximity to heritage sites (cairns & passage tombs), visual effects to the surrounding area (Downpatrick Head), the proximity to dwellings, effects on local ecology (Annex 1 bogs) and areas prone to peat slippage.

A detailed environmental constraints assessment was undertaken in conjunction with civil design, which resulted in the most suitable area for siting 5 no. of the turbines outside the designated zone. The lands outside the designated zones which the turbines are proposed on, have similar characteristics to the lands within the designated zones, i.e. agricultural lands (grazing) and planted conifer forestry. The findings and conclusions of the EIAR clearly point to the Proposed Development not only being suitable as proposed but also being in line with the requirements of proper planning and sustainable development in that the site can clearly accommodate a development as proposed without significant adverse impact on the environment in the vicinity.

4.5.3.4 Analysis of Land Designations for Renewable Energy Potential

The Wind Farm Site is situated across Tier 1, Tier 2 and ‘unclassified lands’ as outlined in the Mayo Renewable Energy Strategy 2011 – 2020 (RES). The RES wind designation zones were designed using multiple constraints. Planning considerations such as designated natural heritage areas, built heritage, scenic views/routes, cycle/walking route and populated areas and infrastructure constraints were identified. It's important to emphasize that the RES does not specifically restrict applications for wind turbines within

the unclassified areas, but rather, they are assessed on their merits 'on the principles of proper planning and sustainable development'. It should also be noted that the Renewable Energy Strategy was due to be updated one year after the CDP came into effect, as of April 2026 the RES is yet to be updated.

The constraints used by Mayo County Council in developing the RES renewable energy potential areas were applied when assessing this Proposed Development and its environs. The Environmental Impact Assessment Report, Natura Impact Statement and all assessments, including hydrological, ecological, visual, and soils assessments demonstrate that the Proposed Development will not create significant adverse impacts on the receiving environment. The Proposed Development site has adequate wind speed and it is not located within a special protected area or SAC, or a Natura 2000 site. The rationale for the siting of the turbines has been outlined in **Chapter 3: Alternatives Considered**. The Proposed Development is fully compliant with National, Regional and Local Planning policy.

As set out in Section 6.5 of the RES, the Mayo Renewable Energy Strategy (RES) allows for renewable developments on unclassified lands, stating they will be assessed on their individual merits under the principles of proper planning and sustainable development. Siting these specific turbines outside the designated tiers was a deliberate outcome of a constraints-led process that prioritised the avoidance of deeper peat, active Annex 1 bogs, and complex archaeological buffers found within parts of the nearby Tier 1 areas. This site-specific approach aligns with the successful precedent set by the nearby Killala Community Wind Farm, which effectively integrated renewable infrastructure into the local environment through similar localised assessments and proven delivery routes.

This Environmental Impact Assessment (EIA) confirms the study area can accommodate the development without significant adverse effects on local amenities, ensuring full compliance with national, regional, and local planning policies.

The overall vision outlined in the RES is that County Mayo harness the energy and economic potential of the county presented by renewable technologies while protecting the environment. It is therefore the conclusion that the Proposed Development will aid in realising the RES vision and contributing to the delivery of Ireland's climate targets under State and European obligations.

As the Proposed Development is in line with the relevant policy documents in particular the mitigation measures set out in the RES, it is considered that the Proposed Development is in compliance with the principles of proper planning and sustainable development, the principal development is acceptable and therefore it should be assessed on its merits by the An Bord Pleanála.

4.5.3.5 *Landscape Appraisal*

The Council commissioned a Landscape Appraisal of the County.

The Landscape Appraisal uses a four-phase methodology to characterise the County's landscape:

1. Identification of **Landscape Character Units (LCU)** (refer to **Table 4.4**) through the mapping and integration of;
 - Physical units
 - Appearance
 - Characterisation

The resultant "Character Units" are then described in terms of their defining landscape characteristics. Boundary determinant factors are then provided for each boundary of the character unit, and finally, "Critical Landscape Factors" are identified that have a bearing on the relative sensitivities or robustness to development within the unit.

2. Determination of **Landscape Sensitivities** (refer to **Section 4.5.3.7**), through the classification of physical features such as landuse, topography and visual units based in CORINE.
3. Designation of 4 **Principal Policy Areas** (refer to **Table 4.5**) is then achieved by grouping the "Landscape Character Units" that have similarity of landscape types, which for Mayo have been identified as:
 - Montaine Coastal
 - Coastal
 - Upland moors/heath/ or bogland
 - Drumlin/Pasture/Woodland
4. **Policy Responses** are then provided for each "Principal Policy Area", which recognises the inherent sensitivities and robustness of each area to development. In addition to landscape based policies a relative ranking of the 8 most common development types with landscape implications is provided. This is based on a weighting system that accounts for the flexibility of the various elements of each development type for each type of development and its inherent ability to influence

the character of an area. The resultant tool is a Development Impact - Landscape Sensitivity Matrix, that provides a general indication of the likelihood of success of planning applications for each development type in each policy area.

4.5.3.6 Landscape Character Units

The Proposed Development is located across two LCUs – Area D North Coastal Plateaux and Area G North Mayo Drumlins, described below.

During the EIA process, photomontages were developed to show the visual impact of the Proposed Development on the Study Area. 35 no. viewpoints were identified. **Section 12.4.2 of Chapter 12 Landscape and Visual Impact Assessment** assessed each viewpoint in relation to the physical landscape effects that the Proposed Development may have on the surrounding landscape. Refer to **Table 4.4** below:

Table 4.4: Landscape Character Units critical landscape factors

| Area D: the critical landscape factors include elevated coastal vistas, smooth terrain and low vegetation. | |
|---|--|
| <i>Elevated Coastal Vistas:</i> The main concern for natural linear features such as coastlines and ridgelines is to avoid penetration by development that will interrupt and reduce the integrity of such elements. | To minimise the visual impact on the coastal vistas, the Vestas V117 turbine was chosen due to its compact size and minimal tip height. |
| <i>Smooth Terrain:</i> allows vistas over long distances against a planar surface without breaking up fore and middle ground. In such terrain, distances can appear shorter and development closer or larger. As a result development can have a disproportionate visual impact in such terrain, due to an inherent inability to be absorbed, physically or visually. | The turbine size and finish will allow for minimal visual disturbance on the landscape. The turbines appearance will be a matt non-reflective finish in a white, off-white or grey colour. |

| | |
|--|--|
| <p><i>Low Vegetation:</i> represented in this unit by moorland and bog type grasses has similar characteristics to smooth terrain in landscape terms, and the two are often interrelated due to soil attributes. Grassland vegetation is generally uniform in appearance, failing to break up vistas, and allowing long distance visibility. This inability to absorb development identifies low vegetation as a critical landscape factor.</p> | <p>The Wind Farm Site and surrounding environments consist mainly of agricultural lands with areas of forestry. The forestry provides screening to the Proposed Development.</p> |
| <p>Area G: the critical landscape factors include undulating topography, shelter vegetation, prominent ridge lines and localised lake vistas.</p> | |
| <p>Undulating Topography: represented in this character unit by glacial drumlins has the ability to both shelter and absorbs the visual impact of development. Firstly, the physical shielding of a built form within the lee of hill where it does not break the skyline renders it visually unobtrusive and reflective of landscape scale. Secondly, the dynamic and complex nature of undulating country provides fore, middle, and distant ground to a vista that helps to provide a realistic scale and visual containment not available in open country.</p> | <p>The undulating topography and drumlins aid in screening the turbines across the landscape.</p> |
| <p>Shelter Vegetation: has a shielding and absorbing quality in landscape terms. It can provide a natural visual barrier and also adds to the complexity of a vista, breaking it up to provide scale and containment for built forms.</p> | <p>The vegetation provides a natural visual barrier to the Proposed Development.</p> |

| | |
|--|---|
| <p>Prominent Ridge Lines: These occur as either primary ridgelines (visible only against the sky from any prospect) or secondary ridgelines (visible at least from some prospects below a distant primary ridge line). In this area both primary and significant secondary ridgelines are located to the east as part of the Ox Mountains. Ridge lines perform the important roles of providing an area with its identity, acting as dominant landscape focal points, and defining the extent of visual catchments. As with other natural linear features such as shorelines, it is important that development does not interrupt the integrity of primary ridgelines. Due to the dominating influence of ridge lines, in instances where penetration does occur, development can appear in subordinate to the landscape in which it sits.</p> | <p>The ridgelines provide screening for the turbines while also breaking up the topography allowing for further screening of the turbines and blending with ridgelines in the background.</p> |
| <p>Localised Lake Vistas: This character unit envelops a large part of Lough Conn, around the shores of which, several major roads pass. Due to the low-lying nature of lakeland environments such as this, low prospect vistas are available from the roads of the Lough and its shores. The main concern for natural linear features such as lake-shores, coast lines, and ridge lines is to avoid penetration by development that will interrupt and reduce the integrity of such elements. Given the low viewing points around the Loughs, visual intrusion by development is likely to be enhanced.</p> | <p>The Proposed Development is located c. 15 km north of Lough Conn. There is screening from vegetation and topography, with minimal visuals of the turbines.</p> |

4.5.3.7 *Landscape Sensitivities*

The Proposed Development is located on land classed as 'Peat Bogs', with partial coverage on 'Agricultural lands with significant natural vegetation'. These designations are classed as sensitive. These areas have a distinctive, homogenous character, dominated

by natural processes. Development in these areas has the potential to create impacts on the appearance and character of an extensive part of the landscape. Applications for development in these areas must demonstrate an awareness of these inherent limitations by having a very high standard of site selection, siting layout, selection of materials and finishes. **Chapter 3, Alternatives** demonstrates the site selection process and turbine siting. The turbines appearance will be a matt non-reflective finish in a white, off-white or grey colour. Applications in these areas may also be required to consider ecological, archaeological, water quality and noise factors insofar as it affects the preservation of the amenities of the area. These factors are considered in **Chapter 6, Biodiversity, Chapter 9, Hydrology and Hydrogeology, Chapter 11, Noise** and **Chapter 14, Cultural Heritage**.

Sensitive areas are prone to localised change over time where vegetative cover or agriculture management practices are the principal determinants. The sensitivity to change may arise from very different sources e.g. woodlands may be sensitive to development that requires tree felling while peat bogs may be sensitive to development that requires tree planting.

The Proposed Wind Farm Site is bordered by a scenic route from north Ballycastle, passing Downpatrick Head to Castlelacken. The coastline of County Mayo is entirely classed as a vulnerable area. The Proposed Development is located c. 1.1 km from the coastline at the closest point.

4.5.3.8 Principle Policy Areas

The Proposed Development is located across two policy areas – Area 1 Montaine Coastal and Area 4 Drumlins and Lowlands.

Table 4.5: Area 1 Montaine Coastal Policies and Project Influence

| Area 1 Montaine Coastal Policies and Project Influence | |
|--|---|
| Policy 1 | Recognise the substantial residential development existing in some locations and the further pressures for residential development in this policy area. |
| Influence | Not applicable to wind farm development. |

| Area 1 Montaine Coastal Policies and Project Influence | |
|---|--|
| Policy 2 | Facilitate appropriate tourism and amenity development in a progressive and clustered manner, where feasible, that reflects the scale, character and sensitivities of the landscape (Ref. to Housing Policy). |
| Influence | Not applicable to wind farm development. |
| Policy 3 | Encourage development that will not have a disproportionate effect on the existing character of the coastal environment in terms of location, design, and visual prominence. |
| Influence | Larger turbines were assessed, however smaller turbines were chosen to reduce the impact on the landscape and reduce the prominence of the turbines within the area. The smaller chosen model will not be visible from Céide Fields, and all turbines were located in lowlands. The Wild Atlantic Way was considered for unobstructed views during the Landscape and Visual Impact Assessment. |
| Policy 4 | Consider development that does not significantly interfere or detract from scenic coastal vistas, as identified in the Development Plan, when viewed from areas of the public realm. |
| Influence | Refer to Policy 3 influence above. |
| Policy 5 | Encourage development that will not interrupt or penetrate distinct linear sections of primary ridge lines and coastlines when viewed from areas of the public realm. |
| Influence | Refer to Policy 3 influence above. |
| Policy 6 | Preserve any areas that have not been subject to recent or prior development and have retained a dominantly undisturbed coastal character. |
| Influence | The Mayo CDP had a focus on protecting Annex 1 bog habitat. The Proposed Development is located in agricultural lands, commercial forestry and degraded cutover bog, and avoids Annex 1 bog. |

| Area 1 Montaine Coastal Policies and Project Influence | |
|--|--|
| Policy 7 | Consider development on steep slopes, ensuring that it will not have a disproportionate or dominating visual impact on the surrounding environment as seen from areas of the public realm. |
| Influence | A Peat Slide Risk Assessment (PSRA) was conducted on areas considered for turbine locations. However, due to the peat slide risk of steep slopes and cultural heritage features, such as cairns, the Wind Farm Site was not sited on steep slopes. |

Table 4.6: Area 4 Drumlins and Inland Lowlands Policies and Project influence

| Area 4 Drumlins and Inland Lowlands Policies and Project influence | |
|--|--|
| Policy 14 | Encourage development that will not interrupt or penetrate distinct linear sections of primary ridge lines when viewed from areas of the public realm. |
| Influence | Policy 14 focuses on protecting the ridgelines. During the design phase of this windfarm, this was considered and influenced the turbine model, size and locations chosen. The siting of turbines on prominent ridgelines was reduced to avoid visual impacts. (See VP3 and VP5 of Chapter 12: Landscape and Visual Impact Assessment) |
| Policy 16 | Preserve from development any areas that have not already been subject to development, which have retained a dominantly undisturbed upland/moorland character. |
| Influence | The Proposed Development is located on agricultural, commercial forestry and lowlands. Of the 16 no. turbines, only one turbine is located on degraded bog. |
| Policy 21 | Recognise that these areas are made up of a variety of working landscapes and contain the vast proportion of the Counties population within principle towns and on rural holdings. These also incorporate all of the major national primary and regional roads, and railways. |

| Area 4 Drumlins and Inland Lowlands Policies and Project influence | |
|---|--|
| Influence | Turbines are located in areas to avoid built up residential zones. A smaller turbine model was chosen following assessments, to avoid built up areas such as Killala, Ballycastle and such. There will be minimum impact on rural areas and roads during delivery of turbine components. |
| Policy 22 | Continue to permit development that can utilise existing infrastructure, whilst taking account of absorption opportunities provided by the landscape and prevailing vegetation. |
| Influence | The LVIA photomontages show the turbines are screened by the landscape. The turbines will have a specific colour chosen to reduce the visual impact and conform with the existing landscape. |
| Policy 23 | Encourage development that will not significantly interfere or detract from scenic lakeland vistas, as identified in the Development Plan, when viewed from areas of the public realm. |
| Influence | The Proposed Development is not located near a Lakeland vista and will not impact the scenic views from such. |
| Policy 24 | Encourage development that will not result in detrimental impacts (through excessive bulk, scale or inappropriate siting) on the landscape at a local or micro level as viewed from areas of the public realm. |
| Influence | Refer to Policy 3 influence above. |

4.5.3.9 Development Impact – Landscape Sensitivity Matrix

The Landscape Sensitivity Matrix is a fusion of the Development Impact Potential Index and the Landscape Area Sensitivity Index, which it should be used in conjunction with. This can be found in Appendix 4.1 Landscape Appraisal for County Mayo on pages 64 – 67 within the current Mayo CDP (2022-2028). Windfarms are classed as having a high development impact on the Development Impact Potential Index, which accounts for: bulk or intensity, scale, design/appearance, location or route required, public benefit and relative landscape impact potential. Policy Area 1 on the Landscape Area Sensitivity index is classed as having a medium sensitivity, while Policy Area 4 is classed as having a low sensitivity. This index accounts for: bulk or intensity, scale, design/appearance, location

or route, proportion over 10% slope and prior development. When the results of the two indexes are combined, the Landscape Sensitivity Matrix is formed which classifies windfarms in Policy Area 1 as having an overall high potential to create adverse impacts on the existing landscape character. Windfarms developed in Policy Area 4 are classified as having a medium to high potential to create adverse impacts on the existing landscape character.

4.5.3.10 Mayo Strategic Environmental Assessment

Minogue Environmental Consulting Ltd. in conjunction with JBA Ireland prepared a Strategic Environmental Assessment (SEA) Statement for Mayo County Council in August 2022. The SEA process was initiated with the drafting of the County Development Plan in both SEA Screening and Scoping stages. In brief, the SEA is a statement summarising how environmental considerations have been integrated into the plan or programme, that is the County Development Plan.

4.5.3.11 Project Compliance with Local Policy

As outlined in **Section 4.5.3.1** and **Section 4.5.3.2** the Proposed Development is compliant with local policy within the CDP and the RES. The Proposed Development, with an estimated maximum installed capacity of c. 68.8 MW, would support and facilitate the CDP's goal of achieving their minimum renewable energy target of 600 MW.

The Proposed Development helps to harness the wind energy of the county, enabling the exploitation of this natural resource for competitive advantage, facilitating economic development, improving the security of the energy supply and helping to stabilise and reduce energy prices. The Proposed Development will create local employment opportunities throughout the construction, operational and decommissioning phases. These opportunities include local contractors being employed, local suppliers being sourced when possible, and the use of hotels and other services.

The Proposed Development will help County Mayo to achieve the goals outlined in the CDP, RES and in National targets. The current installed capacity of County Mayo stands at 358 MW according to Wind Energy Ireland³⁰. The Proposed Development could potentially contribute a further c. 68.8 MW of renewable capacity, which would bring Mayo's total installed renewable capacity to c. 426.8 MW. This represents a significant

³⁰ Wind Energy Ireland (no date) *Wind Energy by County: Mayo*. Available at: <https://windenergyireland.com/about-wind/wind-energy-by-county> [Accessed: 02 April 2026].

advancement towards Ireland's 2030 target of 9,000 MW of installed capacity, as necessitated by national climate mandates³¹.

The Proposed Development provides an opportunity to harness the excellent wind resources of County Mayo; it has been assessed under each of the topics contained in the EIAR and has been found to be in a suitable location. It has been designed to safeguard the environment, including residential amenity. The Wind Farm Site is situated across Tier 1, Tier 2 and 'unclassified lands' as outlined in the Mayo Renewable Energy Strategy 2011 – 2020 (RES). It's important to emphasize that the RES does not specifically restrict applications for wind turbines within the unclassified areas, but rather, they are assessed on their merits 'on the principles of proper planning and sustainable development'. It should also be noted that the Renewable Energy Strategy was due to be updated one year after the CDP came into effect, as of April 2026 the RES is yet to be updated.

As set out in Section 6.5 of the RES, the Mayo Renewable Energy Strategy (RES) allows for renewable developments on unclassified lands, stating they will be assessed on their individual merits under the principles of proper planning and sustainable development. Siting these specific turbines outside the designated tiers was a deliberate outcome of a constraints-led process that prioritised the avoidance of deeper peat, active Annex 1 bogs, and complex archaeological buffers found within parts of the nearby Tier 1 areas. This site-specific approach aligns with the successful precedent set by the nearby Killala Community Wind Farm, which effectively integrated renewable infrastructure into the local environment through similar localised assessments and proven delivery routes.

This Environmental Impact Assessment (EIA) confirms the study area can accommodate the development without significant adverse effects on local amenities, ensuring full compliance with national, regional, and local planning policies.

This Environmental Impact Assessment (EIA) confirms the study area can accommodate the development without significant adverse effects on local amenities, ensuring full compliance with national, regional, and local planning policies.

³¹ Government of Ireland (2024) *Climate Action Plan 2024*. Dublin: Government Publications. Available at: <https://www.gov.ie/en/publication/e312a-climate-action-plan-2024/> [Accessed: 02 April 2026]

By producing renewable energy which will displace greenhouse gas emitting fossil fuels, the Proposed Development assists in achieving the outcomes of the Mayo County Council Climate Action Plan 2024-2029.

4.6 OTHER RELEVANT GUIDELINES

4.6.1 The Wind Energy Development Guidelines (WEDGs), Guidelines for Planning Authorities, (DoHLG, 2006)

The Wind Energy Development Guidelines (DoHLG, 2006) advise that a reasonable balance must be achieved between meeting Government Policy on renewable energy and the proper planning and sustainable development of an area, and it provides advice in relation to the information that should be submitted with planning applications. The effects on residential amenity, the environment, nature conservation, birds and the landscape should be addressed. It states that particular landscapes of very high sensitivity may not be appropriate for wind energy development.

The Wind Energy Development Guidelines 2006 remain valid until the revised, Draft Wind Energy Guidelines 2019 are finalised and published by the government.

4.6.2 The Draft Revised Wind Energy Development Guidelines (DoHLG, 2019)

The key aspects for the draft proposed new wind energy guidelines include the following:

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

The Proposed Development has been designed in accordance with the current Wind Energy Development Guidelines 2006 and has regard to the Draft Revised Wind Energy Development Guidelines 2019 in relation to:

- Noise impacts (assessed in **Chapter 11: Noise**) are in line with the guidance.
- To eliminate shadow flicker at nearby dwellings, assessment and mitigation measures have also been included in the project, in line with the draft guidelines, full details of this can be found in **Chapter 5: Population and Human Health**.

- Engagement with local communities has taken place throughout the design and planning phases of the Project. Full details can be found in **Chapter 1: Introduction** and in the Community Report in **Appendix 1.6**.

4.6.3 National Landscape Strategy for Ireland 2015-2025

The National Landscape Strategy for Ireland sets out a roadmap. The objectives of the National Landscape Strategy are to:

- *Implement the European Landscape Convention by integrating landscape into our approach to sustainable development.*
- *Establish and embed a public process of gathering, sharing and interpreting scientific, technical and cultural information in order to carry out evidence-based identification and description of the character, resources and processes of the landscape.*
- *Provide a policy framework, which will put in place measures at national, sectoral - including agriculture, tourism, energy, transport and marine - and local level, together with civil society, to protect, manage and properly plan through high quality design for the sustainable stewardship of our landscape.*
- *Ensure that we take advantage of opportunities to implement policies relating to landscape use that are complementary and mutually reinforcing and that conflicting policy objectives are avoided in as far as possible.*

Landscape and Visual Impacts are assessed in **Chapter 12: Landscape and Visual Amenity**.

4.6.4 Material Planning Considerations

4.6.4.1 The National Interest and Strategic Importance

The Proposed Development will make a valuable contribution to tackling climate change and GHG reductions as part of the international (**Section 4.3**) and European (**Section 4.4**) efforts to combat climate change.

Ireland is facing significant challenges in efforts to meet renewable energy and emissions targets and is falling behind in the longer-term movement away from fossil fuels. Ireland has one of the highest rates of importing fuel in Europe with energy import dependency increasing to 78% in 2023. Energy demand in Ireland has been growing and is expected to continue to increase, especially electricity demand which is expected to increase by

45% between 2023 and 2034³². Increases to the cost of carbon, supply issues, and potential political insecurity increases fossil fuel price volatility. Geopolitical instability has led to energy prices in Ireland increasing significantly. According to the SEAI The average residential electricity prices increased 29% from 2023 to 2024. The Economic and Social Research Institute (ESRI)³³ report on Energy Poverty published in 2022, has also warned that as many as 43% of households could now be in energy poverty.

The high rate of imported fossil fuel dependency, the increasing demand for electricity and current energy price volatility make it vital to introduce more domestic renewable energy generation plants, such as the Proposed Development, to provide reliable, secure and affordable energy supplies in Ireland. The Proposed Development could improve Irish energy security and reduce reliance on imported fossil fuels in line with the National Energy Security Framework (**Section 4.5.1.8**) and the REPowerEU Plan (**Section 4.4.4**).

The construction of the Proposed Development will also positively contribute to the regional economy bringing investment and jobs that will help to support and retain confidence in the key regional industries of construction and renewable energy.

4.6.5 The Economic Importance of the Proposed Development

The Proposed Development would represent a strategically significant investment in the locality of County Mayo and the wider Northern and Western region. The Proposed Development will provide a multi-million euro benefit to both the Irish and local economies and the opportunity to reinforce the existing local renewable energy industry knowledge and skills base, providing the stability and diversity to the rural economy that can stimulate further industry investment to take place. This will have a positive economic impact with several Irish firms commissioned to work on the design, environmental assessment and planning aspects of the Proposed Development. Local suppliers will be used wherever possible during the construction phase and in the operational stage, Irish businesses will benefit from the provision of a reliable, local renewable energy source.

³²EirGrid. (2022). EirGrid's Generation Capacity Statement Predicts Challenging Outlook for Ireland

<https://www.eirgrid.ie/news/new-eirgrid-analysis-examines-balance-between-electricity-demand-and-supply-ireland-over-10> [Accessed 08th April 2026]

³³ ESRI. (2022). Energy poverty at highest recorded rate <https://www.esri.ie/news/energy-poverty-at-highest-recorded-rate> Accessed [Accessed 08th April 2026]

4.6.6 Renewable Energy Policy

The Proposed Development meets the objectives of Project Ireland 2040 as it will contribute to the economic, environmental, and social objectives of the NPF, in particular National Policy Objectives 69 & 70.

It is critical that a progressive approach is taken to development of renewable energy projects in order to deliver the CAP 2025 objective of meeting an 80% share of electricity generated by renewables by 2030. The Proposed Development would contribute an additional c. 68.8 MW MEC of renewable electricity to the CAP 2025 target of 9 GW of onshore renewable electricity generation by 2030 helping to reduce the current 4 GW shortfall. It also contributes to assisting Ireland to increase from 40.4% electricity produced by renewable sources in 2024 to 80% by 2030 to meet the CAP2025 target.

As a form of sustainable energy, with an output potential of c.68.8 MW MEC of installed capacity at the Proposed Development, which will contribute significantly to renewable energy targets and the strategy set out in the RSES for the Northern and Western Region.

The CDP 2022-2028 follows the national Climate Action Plan by supporting Ireland's goal of carbon neutrality by 2050. The current installed capacity of County Mayo stands at 358 MW. The Proposed Development could potentially contribute a further c. 68.8 MW of renewable capacity, which would bring Mayo's total installed renewable capacity to c. 426.8 MW, a significant step towards its 2030 goal of 600 MW of installed capacity.

4.6.7 The Proposed Development as Sustainable Development

Sustainable Development is development which meets the needs of the present without compromising the ability of future generations to meet their own needs, as outlined in the Brundtland Report³⁸, it is still the overarching understanding of sustainable development today. The Proposed Development is an excellent example of sustainable development, and is aligned with national, regional and local policies and objectives, some examples are:

- The objectives in section 1 of the NPF, (**Section 4.5.1.2**) which sets out that *"sustainability is at the heart of long-term planning and the National Planning Framework"*.

³⁸ Our Common Purpose: Brundtland Report, 1987

- The national objective of the “The National Climate Policy Position, of achieving transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050.
- The Mayo County Development Plan (CDP) 2022 – 2028 which sets out the overarching strategic framework for sustainable development in spatial, economic, social and environmental terms (**Section 4.5.3.1**).

A key challenge for the NPF has been to explore alternatives that can accommodate projected growth in the most optimal and sustainable manner that could achieve Ireland’s economic, social and environmental requirements. The Proposed Development meets each of these three requirements as outlined in **Table 4.7**.

Table 4.7: How the Proposed Development Interacts with the economic, social and environmental requirements of sustainable development.

| Pillar Type | Project Interaction |
|----------------------|--|
| Economic Role | The Proposed Development would represent a strategically significant investment in the locality. The Proposed Development provides the opportunity to reinforce and grow the existing local renewable energy industry knowledge and skills base, while providing the stability and diversity to the rural economy to stimulate further development by attracting new business to the region due to the improved supply of electricity. The Proposed Development will have a positive economic effect with several Irish firms commissioned to work on the design, environmental assessment and planning. |
| Social Role | The contribution of the Proposed Development to the de-carbonisation of the Irish electricity network will contribute positively to issues of strategic social importance. It will assist in mitigating climate change and improve air quality while enhancing energy security, including helping to stabilise and reduce energy costs. The Proposed Development will also create jobs, economic development and rural diversification. |

| Pillar Type | Project Interaction |
|----------------------------------|--|
| <p>Environmental Role</p> | <p>Overall, the EIAR sets out that the likely environmental effects arising from the Proposed Development will not be significant following the implementation of proposed mitigation measures. The findings demonstrate that the environment can accommodate the Proposed Development without giving rise to likely significant environmental effects in line with the Mayo County Development Plan objectives as well as regional, national and international policy. The NIS concludes, on the best available scientific evidence that it can be demonstrated objectively, that no elements of the Proposed Development will result in an adverse effect on the integrity of a European Site or on the Qualifying Interests/Special Conservation Interests of any relevant European site, either on their own or in-combination with other plans or projects, in light of their conservation objectives.</p> <p>Over its' lifespan (35 years), the Proposed Development would displace an approximate 1,740,156 tonnes of CO₂. This would help to mitigate climate change and the effects on the ecosystem globally.</p> |

4.7 CONCLUSION

Throughout this chapter, renewable energy has been identified as being required to play an essential role in mitigating climate change by transitioning to a low carbon economy and society. By investing in renewable energy, Ireland can promote sustainable economic development using its own, secure, and clean energy.

All planning applications have to be determined on their individual merits with due consideration given to the overall planning balance of a scheme. The pressing need to address climate change and the overriding public interest being given to renewable energy projects, further supports additional renewable energy projects, such as the Proposed Development.

The Proposed Development in County Mayo will provide an anticipated c. 68.8 MW of renewable, domestically produced wind energy. This additional renewable power generated will contribute to a reduction in greenhouse gas emissions from fossil fuels, improve regional/national energy security and help Ireland achieve our renewable electricity targets.

The Proposed Development contributes to supplying the national demand for renewable energy, which in the context of the ongoing climate emergency and increasing demand is an urgent Irish national priority.

While renewable energy in Ireland has come a long way, there is still a shortfall in where the nation needs to be to achieve increasing targets. Ireland missed its 2020 RES target as part of RED I, achieving 13.5% instead of the target 16%. Ireland's overall RES target has now increased to 43.0% in 2030 as part of RED III. There is a clear national mandate to accommodate significant onshore wind within the next decade with the CAP2025 setting a 9 GW target for installed wind energy capacity by 2030. In Dec 2024 this was 4.8 GW³⁹, leaving a shortfall of 4.2 GW to be achieved in the next 5 years.

Further, the National Planning Framework emphasises a move to a low-carbon economy, reducing Ireland's carbon footprint and integrating climate action into the planning system. The RSES for the Northern and Western Region supports opportunities for onshore wind as a major source of renewable energy with an important role in delivering value and clean electricity for Ireland. The CDP reinforces the national and regional energy policies. While parts of the Proposed Development fall outside an area designated for wind farms, the furthest turbine located from a designated area is only c. 820 m. The site does not fall within areas which are protected, such as SACs, SPAs, NHAs and pNHAs. As discussed in **Section 4.5.3** above, Section 6.4 of the Mayo RES makes provision for the Local Authority to consider all proposed renewable energy developments submitted through the planning system on a case-by-case basis, unless located on a Natura 2000 site.

The Proposed Development meets the definition of Sustainable Development as defined by the NPF in terms of the three sustainability pillars: Economy, Environment and Social. It also contributes to the UN sustainability goals; 3 Good Health and Wellbeing, 7 Affordable and Clean Energy, 8 Decent Work and Economic Growth, 9 Industry Innovation and Infrastructure, 11 Sustainable Cities and Communities and 13 Climate Action.

The development process adopted by the Applicant has represented a best practice approach to a renewable energy scheme design, minimising the potential effects on the receiving environment through multiple design iterations and modifications, and ensuring

³⁹ Wind Energy Ireland (2024) 'Wind Stats' Available at: <https://windenergyireland.com/about-wind/the-basics/facts-stats> (Accessed on: 8th April 2026).

compliance with the suite of planning policies and objectives of the Mayo CDP. The layout of the Proposed Development presented in the planning application and EIAR represents the optimum fit, considering the technical and environmental parameters of this project as discussed within this EIAR.

Likely significant effects have been considered within this EIAR and through the process of assessment, embedded mitigation, and additional proposed mitigation outlined in the EIAR, NIS, Construction Environment Management Plan and Biodiversity Enhancement and Management Plan it has been shown that the Proposed Development can be constructed, operated and decommissioned without likely significant effects on the environment arising.

This chapter outlines how the Proposed Development is compliant with International, European and National policy on energy security, emissions reductions and renewable energy production. It has reviewed policy for the Northern and Western region and local County Mayo policies and finds the Proposed Development complies with key renewable energy and environmental policy objectives.

The Proposed Development is aligned to all the relevant planning policies identified throughout this chapter, and it will contribute to achieving renewable energy and reduction in emissions targets locally, regionally and nationally.