CONSTANT ENERGY LIMITED

TIRAWLEY WINDFARM

PLANNING STATEMENT

APRIL 2026

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Document Final	Name Vivienne Egan	Name Michael Garvey
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PROPOSED WIND FARM AT TIRAWLEY, CO. MAYO

PLANNING STATEMENT

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1 INTRODUCTION AND BACKGROUND TO THE PLANNING APPLICATION

1.1 Introduction

Jennings O'Donovan & Partners Limited, Consulting Engineers, have prepared this Planning Statement ("The Statement") on behalf of Constant Energy Limited (The Applicant) to accompany the application ("The Application").

The purpose of this Planning Statement is to outline the background to the Project, the key elements of the proposal and to demonstrate that the proposed Project complies with all relevant planning policy and is in accordance with the proper planning and sustainable development of the area.

This Statement provides a comprehensive assessment of the proposed Project's consistency with the relevant planning policy documents at European, national, regional and local levels.

The Planning Application is for the erection of 16 wind turbines; diameter 117m, hub height 76.5m, tip height of 135m; A Battery Energy Storage System; Change of use of a vacant residential dwelling to a permanent operations compound; 80m meteorological mast; 1 no. permanent 110 kV electrical substation; 1 no. control building; all associated underground electrical and communications cabling; ancillary forestry felling; and associated site development works.

The Proposed Development site area as redlined in the planning drawings is 108.06 ha.

1.2 Previous Planning Application

A planning application was previously submitted on this site under ACP-323778-25 for 16 turbines, however, as the EIAR had been prepared for 18 turbines, the planning application did not meet the completeness check requirements and returned as incomplete. In addition, a second connection option was being considered in the EIAR for a 110kv underground connector cable between the development and a proposed hydrogen plant at the Killala Energy Hub, this has been removed, therefore no design flexibility is sought with this application.

This planning application is a revision of the previous application ACP-323778-25 and addresses the items noted by An Coimisiún Pleanála previously, items which were received as a result of Pre Application meetings, the completeness checks and correspondence with An Coimisiun Pleanala.

1.3 Strategic Infrastructure Development

The Planning Application will be submitted directly to An Coimisiún Pleanála, (also referred to as "the Board" in relevant legislation, set out below) as a Strategic Infrastructure Application.

Strategic Infrastructure Development (SID) falls under the Planning and Development Act 2000 (as amended by the Planning and Development (Strategic Infrastructure) Act 2006). Certain large scale private developments are listed in the 7th Schedule of the Planning and Development Acts.

The Act states, under 37A, that (1) An application for permission for any development specified in the Seventh Schedule (inserted by the Planning and Development (Strategic Infrastructure) Act 2006) shall, if the following condition is satisfied, be made to the Board under section 37E and not to a planning authority. That condition is that, following consultations under section 37B, the Board serves on the prospective applicant a notice in writing under that section stating that, in the opinion of the Board, the Project would, if carried out, fall within one or more of the following paragraphs, namely –:

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

(b) the development would contribute substantially to the fulfilment of any of the objectives in the National Spatial Strategy (now the National Planning Framework) or in any regional planning guidelines (Now regional spatial strategies) in force, in respect of the area or areas in which it would be situate; or

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

Section 37 (b) states that a person who proposes to apply for permission for any development specified in the Seventh Schedule shall, before making the application, enter into consultations with the Board in relation to the Project. In any consultations, the Board may give advice regarding the proposed application and includes the procedures involved in making a planning application and in considering such an application, and what considerations, related to proper planning and sustainable development or the environment, may, in the opinion of the Board, have a bearing on its decision in relation to the application. Where following consultations, the Board considers that the proposal is a SID, they are required to serve a notice in writing.

A wind farm with more than 25 wind turbines or which has a total output of more than 50 megawatts, and meeting the criteria set out above is considered Strategic Infrastructure Development. This proposal of 16 No. turbines, producing a total of 68.8MW meets the criteria.

The Applicant undertook the required Consultations and a Pre Application Consultation with An Coimisiún Pleanála took place on 20th January 2026. Accordingly, the Board decided that the proposed Project would be strategic infrastructure within the meaning of section 37A of the Planning and Development Act 2000, as amended. It was advised that any application for permission for the proposed Project must therefore be made directly to An Bord Pleanála under section 37E of the Act.

A list of prescribed bodies to be notified of the application for the proposed Project was provided and included, as follows:

- Department of Housing and Local Government and Heritage
- Department of Climate, Energy and the Environment
- Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media
- Department of Agriculture, Food & Marine
- Mayo County Council
- Sligo County Council
- Northern and Western Regional Assembly
- Transport Infrastructure Ireland
- An Chomhairle Ealaion (Arts Council)
- The Heritage Council
- Failte Ireland
- An Taisce
- Irish Water
- Inland Fisheries
- Irish Aviation Authority
- Air Nav Ireland
- Ireland West Airport (Connaught Airport Development Company (CADCO) Ltd.)
- EPA
- HSE
- Health and Safety Authority
- The Commission for Regulation of Utilities
- ESB

- EirGrid

1.4 Previous Planning Application and Incomplete Application

The previous planning application ACP-323778-25, as referred to in 1.2 above, was deemed incomplete as a result of the Completeness Check, under Section 37 JA (b) and returned on 11th Nov 2025.

Under Section 37E (2) Compliance, it was stated that there was an inadequacy or incompleteness of the EIAR. The Completeness Check stated that, as the EIAR was for 18 turbines and the planning application was for 16 turbines, this did not comply with Article 94 of the Planning and Development Regulations as the EIAR did not describe what is being applied for.

In addition, it was stated in the Planning Statement that permission was being sought for an onsite 110kv substation and an underground Grid Connection to the existing Tawnaghmore 110kv substation, it was also stated that a second connection option was considered in the EIAR for a 110kv underground connector cable between the development and a proposed hydrogen plant at the Killala Energy Hub. No design flexibility was sought or given so the option was not open to be availed of.

The proposed BESS also had not been specifically referenced to or discussed during the Pre Application Stage and the HSA were not included as a prescribed body.

In addition, under compliance with Article 94 and Schedule 6, the issue of 16 turbines and 18 turbines in the EIAR was mentioned. It also stated that the noise modelling was for 18 turbines, the shadow flicker for 18 turbines and the risk modelling for birds was for 19 turbines.

The EIAR also assessed two grid options, but design flexibility was not sought or provided.

1.5 Recommendations from the Pre-Planning Consultations

The Pre-Planning Meeting, as referred to above, held on 20th January 2026, not only determined that the application was a SID but also set out a number of considerations relating to proper planning and sustainable development and the environment may have a bearing on a decision.

1.6 Meeting the Requirements for the Completeness Check

To clearly demonstrate and reflect the updates to the EIAR, a checklist was generated and reference were added. **Refer to Appendix A Tirawley Completeness Checklist** of this Planning Statement for a comprehensive Project Specific Completeness Checklist of all items noted by An Coimisiún Pleanála to aid a successful Completeness Check of the Planning Application under the legislative requirements.

1.7 RED III

The first Renewable Energy Directive (2009/28/EC) (RED I) provided the framework for the promotion of energy from renewable resources across the EU. The second Renewable Energy Directive 2018/2001/EU (RED II) entered into force in December 2018 and was transposed into Irish law in September 2020 by S.I. No. 365/2020 – European Union (Renewable Energy) Regulations 2020. In 2023, the European Union (EU) adopted an amendment of the Renewable Energy Directive (EU/2023/2413), which is referred to as "RED III". A number of articles of RED III have been transposed into the planning code by the European Union (Planning and Development) (Renewable Energy) Regulations 2025. There are a number of changes to the requirements for making a planning application and Grid Applications. A planning authority must acknowledge the completeness of an application within 45 days of its receipt. Mandatory permit granting timelines have been introduced, and these cannot be paused due to Requests for Further Information or to allow for Environmental Assessments to be carried out.

2 STATEMENT OF AUTHORITY

This Planning Statement has been prepared by Vivienne Egan on behalf of Jennings O'Donovan & Partners Limited. Vivienne has a MSc in Planning from Queens University, Belfast, is a Member of the Irish Planning Institute and has over 30 years' experience in Planning throughout Ireland and the UK. She has a clear understanding of the legislative framework and has experience in the development of wind farms from the pre-planning process through to completion.

2.1 The Applicant

The Applicant – Constant Energy Limited, an Irish company based in Limerick, is seeking to develop and operate an energy portfolio with an emphasis on renewable energy and gas fueled energy production and thus contribute to the security, reliability, and sustainability of Irish energy system. Constant Energy's strategy to achieve this vision is to develop an

energy portfolio of Wind Farms, Hydrogen Production Plants, Open Cycle Gas Turbine Power Generation and Solar Farms.

2.2 Site Location and Context

The Site is located ~14.5 km northwest of Ballina Town, ~5.2 km northwest of the village of Killala and ~4 km east of Ballycastle village in north Co. Mayo. The Wind Farm Site is located ~10.5 km east of the county border between Mayo and Sligo. The Wind Farm Site has a total area of ~108.06 ha. The Wind Farm Site is accessed via local public roads which branch off the R314 which joins Killala in the southeast to Ballycastle in the northwest. These local public roads serve numerous dwellings and associated farm buildings scattered in land surrounding the Wind Farm Site.

The windfarm site is located within the townlands of Ballymurphy, Ballynaleck, Barnhill Lower, Barnhill Upper, Barroe, Billoos, Carn, Carrickanass, Carrowmore, Castlelackan Demesne, Castletown, Conaghra, Glebe, Lackanhill, Lecarrowntemple, Lissadrone East and Lissadrone West, Co. Mayo. The Grid Connection Route will commence in the townlands of Barroe and will continue onto the townlands of Carrad More, Tawnaghmore Upper, Rathbaun, Carrickanass, Cloonavarry, Doonamona, Rathcash, Castlereagh, Rathowen West, Rathowen East, Magherabrack, Cloonawillin, Killala, Mullafarry, Lisglennon, Tawnaghmore Lower, Ballinteean and Carrowreagh Co Mayo.

Topography across the Wind Farm Site is variable, ranging from ~20 to 155 m OD (meters above Ordnance Datum). The northern and central areas of the Wind Farm Site are located on elevated ground. The highest elevations are found in the north of the Wind Farm Site, which is situated on the southeastern slopes of Knockboha Hill, which stands at an elevation of ~186 m OD. There are also several other local high points further to the south which range in elevation from ~108 to 137 m OD. The southern section of the Wind Farm Site is located on lower ground with topography sloping gently to the southeast towards Cloonaghmore Estuary and Killala Bay. A Site Location Map showing the Wind Farm Site boundary is appended as **Figure 1.1** and a map which comprises all elements of the Wind Farm Site is outlined as **Figure 1.2.** The Wind Farm Site is located in a rural setting and housing density in the area is low. There are 284 houses within 2 km of the proposed turbines. The closest inhabited dwelling to a turbine not associated with the Proposed Development (H5) is located 554 m from the nearest turbine (AT10). The V117 turbine with a 135 m blade tip height (4 x 135 m = 540 m) maintains 540 m housing buffer.

The EIAR assesses the Proposed Development as outlined above, including improvements and temporary accommodation requirements to the existing public road infrastructure. These infrastructure works, required to facilitate turbine delivery, are situated in the townlands of Annagh Beg, Creevagh More, Garranard, and Billoos.
The closest inhabited dwelling to a turbine not associated with the Proposed Development (H3) is located 554 m from the nearest turbine (AT08). The V117 turbine with a 135 m blade tip height (4 x 135 m = 540 m) maintains 540 m housing buffer. All residential dwellings located within 2 km of the proposed turbines are shown in **Figure 2.4** of the EIAR.

There is 1 no. dwelling (H2) located c. 321 m southwest from AT01. This property is under the control of the Developer, and the owner is a financial beneficiary of the Proposed Development. The owner has confirmed that this property will remain unoccupied for the operational lifespan of the Proposed Development.

There is 1 no. disused vacant dwelling (H1) located c. 265 m southwest of AT12. This dwelling is under the control of the Developer and as part of the planning application, permission is sought for it to be converted and used as an operations building for the lifespan of the Proposed Development.

The Wind Farm Site area contains approximately 172 ha of commercial forestry. Nine of the 16 turbines are surrounded by forestry. Therefore, tree felling will be required as part of the Project. To facilitate the Site Access Tracks, civil works, Met Masts and Turbine Hardstands. In all, some 31.86 ha of forestry will need to be clear-felled.

There are 14 operational, consented and proposed wind farms for which planning applications are already submitted for determination within 20 km of the Wind Farm Site. **Figure 2.5** shows the location of proposed, permitted and operational wind farms within a c. 20 km radius of the proposed turbines. **Table 2.1** in the EIAR provides further information on these wind farms. The nearest operational wind farm is Killala Community Wind Farm, which is located c. 5.2 km south-east of the Wind Farm Site. There is 1 no. domestic turbine located c. 1 km north of the Wind Farm Site and 1 no. domestic wind turbine located c. 3.5 km southeast of the Wind Farm Site.

Other developments or proposed developments (bigger than a one-off house and within the last 5 years) within 10 km are the developments or proposed developments listed in **Table 2.2** of the EIAR.

The majority of the Wind Farm Site is located on lands under the ownership of third-party private landowners who have consented to the application and the Proposed Development.

The 16-turbine layout (135 m tip height) features an irregular, dispersed design to maintain visual permeability and distant views. This configuration ensures the Proposed Development is well assimilated within the broad scale of the existing landform and land use patterns, avoiding undue scale conflicts with the underlying landscape. A full appraisal with 35 representative viewpoints is provided in **Chapter 12: Landscape and Visual Amenity**.

There is a total of 14 proposed site entrances associated with the Proposed Development: consisting of 5 no. new site entrances opening out onto public roads and the upgrading of 9 existing entrances and the widening of 1 no. junction located on the R314. Works will include the removal of existing vegetation for visibility splays and widening to facilitate the use of each entrance for the delivery of construction materials and turbines to the Wind Farm Site.

The locations and details of each of these entrances are detailed in **Chapter 17: Traffic and Transportation.** The TDR and the Construction Haul Routes (CHR) will utilise site entrance 1-14, refer to **Figure 2.1** and **Appendix 17.1 Turbine Delivery Route**.

Turbine Delivery Routes are set out in Chapter 17: Traffic and Transportation and Appendix 17.1 Turbine Delivery Route Report.

Approximately 2.28 km of existing private tracks within the Wind Farm Site will be upgraded for the Proposed Development. These private tracks will be widened to provide a width of 4.5 m (an additional c. 2 m road width) and will cover an additional area of c. 3,526 m^2 will require approximately 1,058 m^3 of stone material.

Approximately 1.58 km of existing public roads require widening within the Wind Farm Site. These existing public where required will be widened to provide a width of 4.5 m (an additional c. 2 m road width), will cover an additional area of c. 3,156 m^2.

The data required for the Proposed Development will be provided by one dedicated meteorological mast measuring 80 m in height with a 4 m lightning mast (location as detailed in **Figure 2.13**). The Met Mast will be situated in the southwest of the Wind Farm Site.
It is proposed to construct a new tail fed 110 kV Gas Insulated Switchgear (GIS) substation on the Wind Farm Site (**Figure 2.16** and **Figure 2.17**)**,** together with an underground cable

measuring approximately 13.55 km in length to connect to existing Tawnaghmore 110 kV substation.

The proposed GIS Electrical Substation will be located south of wind turbine AT01. The Onsite Substation compound will include 1 no. GIS Building and an associated outside compound which will contain 4 no. transformers.

A standalone BESS compound is proposed immediately to the east of the substation. The BESS compound is not part of the substation and can be completed either at the date of construction of the substation or at a later date. The BESS compound area will be approximately 6,360 m^2 (60.7 m x 104.8 m) and is shown on **Planning Drawing: 6289-PL-2000**. The foundation will be up to 0.5 m in depth and will be constructed from engineered stone material, using similar construction techniques as for the Turbine Hardstands. The proposed will comprise containers approximately 10.96 m x 3.88 m placed on concrete plinth foundations 150 mm above the general site level and will be assembled on terraces over permeable granular unbound surfacing (battery containers are shown on **Planning Drawings: 6289-PL-2004**). Each container will house a modular array of lithium-ion (Li-on) batteries, or similar type technology. The battery array will be placed in modular racks which will allow them to be taken out and replaced as needed. The containers will contain control equipment, HVAC equipment, fire safety equipment and inverter units. The transformer units will be housed in separate containers located in front of each of the main battery containers, **Planning Drawings: 6289-PL-2002**.

The power generated by each wind turbine will be transmitted via underground Wind Farm Internal Cabling to the proposed 110 kV Onsite Substation also, the communications signal cabling will be installed in the same trench.

Connection will be sought from the grid system operators by application to EirGrid. The substation will connect via underground 110 kV cable at the existing Tawnaghmore 110 kV Substation. The cable will connect into existing infrastructure within the confines of the substation and its compound.

The route of this underground grid connection is provided in **Figure 2.2**. The overall length of the grid connection between the Wind Farm substation and the existing Tawnaghmore 110 kV substation is 13.55 km, of which 12.43 km is located along the public road corridor and 1.12 km is located within the Killala Business Park grounds.

The Wind Farm Site is drained by several small streams. Many of these natural watercourses originate in the vicinity of the Wind Farm Site and flow downslope before discharging into the Cloonalaghan River to the southeast or directly into Lackan Bay.

There is an existing (disused) quarry within the proposed development site. A meeting was held with Mayo County Council Quarry officer Barry Freeman on the 5th March 2026 regarding the planning status and it was agreed that as the quarry is abandoned it should be treated as such for the purposes of the planning application.

2.3 Planning History

Table 1.1: Planning History of the Site

Reg. Ref. No:	Nature of Proposed Development	Nature of Final Decision of Application Grant of Refusal by Planning Authority / An Coimisiun Pleanála
16329	Slatted shed	Permission Granted
16440	Completion dwelling	Permission Granted
16484	Extension Dwelling	Permission Granted
16694	Modifications to Warehouse	Permission Granted
17579	Cattle Underpass	Permission Granted
17619	5 turbine windfarm	Permission Granted
18303	Retain dwelling	Permission Granted
20123	Dwelling	Permission Granted
20644	Dwelling	Permission Granted
2122	Dwelling	Permission Granted
21708	Quarry	Permission Granted
2193	Biogas and Pipeline	Permission Granted
2360117	Hydrogen Plant and Energy Centre	Permission Granted

Reg. Ref. No:	Nature of Proposed Development	Nature of Final Decision of Application Grant of Refusal by Planning Authority / An Coimisiun Pleanála
2360134	Electricity Generation Station	Permission Granted
2360182 2360266 2460295 2460363 2460699 2460708	Inert waste Recovery Facility Drainage infrastructure Bulk Storage Silos Retain Dwelling house Commercial buildings Data Centre Buildings	Permission Granted Permission Granted Permission Granted Permission Granted Permission Granted Permission Granted

2.4 Planning History Quarry within the Site boundary

Constant Energys Planning Representative met with Mayo County Council Quarry Officer Barry Freeman on the 5th March 2026 regarding the planning status of the quarry within the site boundary. For the purposes of this application to the Coimisiun it was agreed with Mayo County Council that the status of the quarry is abandoned.

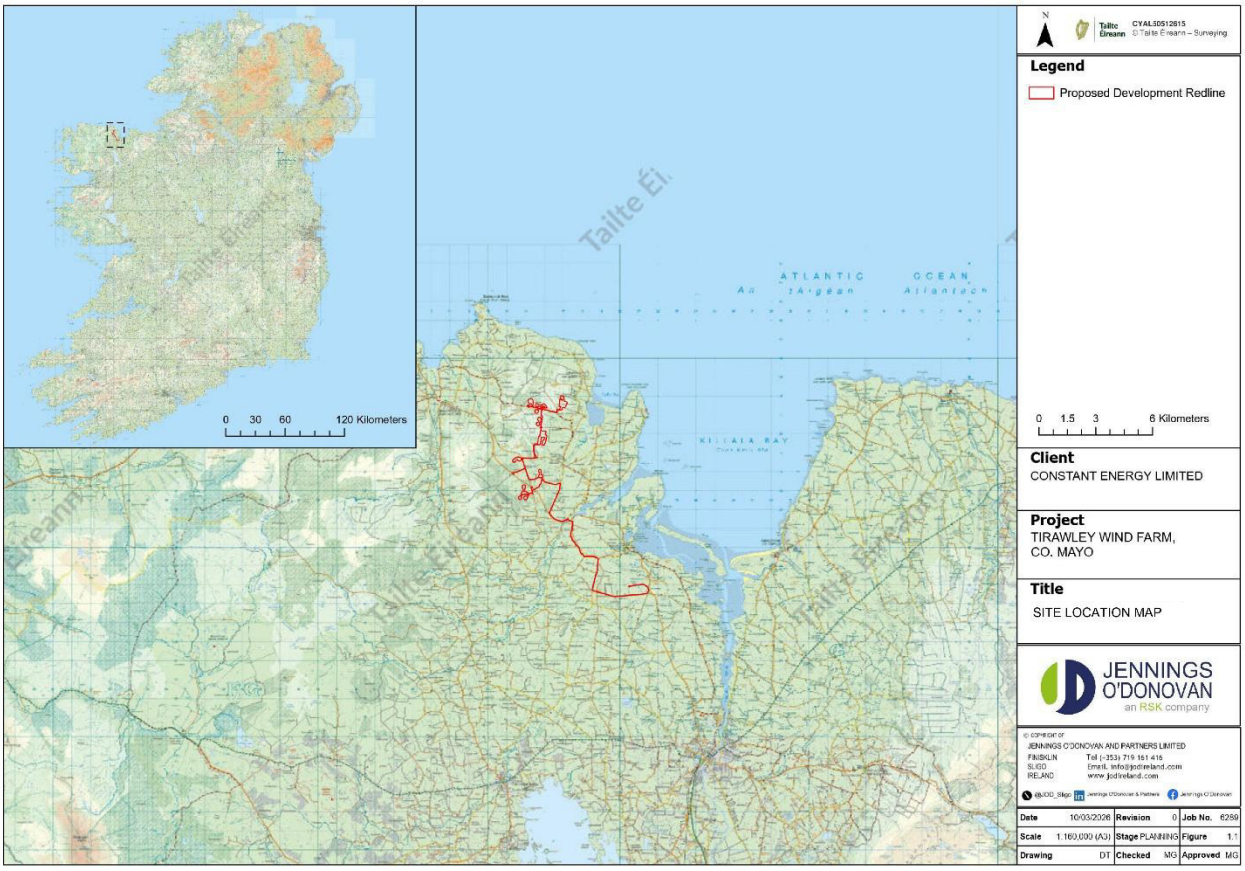


Figure 1.1: Site Location Map

Figure 1.2: Project Layout

3 PROPOSED PROJECT

Planning Permission is being sought by the Developer for the construction of 16 No. Wind Turbines with an anticipated output of 68.8MW, 1 No. meteorological mast, a Permanent Operations Compound, an Onsite Substation, Battery Energy Storage System (BESS), Spoil Deposition Areas and all ancillary works, works along the Turbine Delivery Route (TDR) and the construction of an underground Grid Connection to Tawnaghmore 110 kV substation, Killala Business Park, Co. Mayo.

The proposed development will consist of the following:

Erection of 16 wind turbines – Vestas V117 (4.3mw) IEC IIA -T. The candidate wind turbines have a rotor diameter of 117m, a hub height of 76.5m and a tip height of 135m. No flexibility in terms of turbines dimensions is sought as part of the application for Planning Permission.

- Installation of battery arrays located within container units and associated electrical plant for grid stabilisation adjacent to the Onsite Substation building with surrounding palisade fence 2.65m in height.

Construction of permanent turbine hardstands and turbine foundations.

Change of use of a vacant residential dwelling to a permanent operations compound consisting of an operations office, storage area and staff parking, upgrade existing site utilities and replace existing septic tank with a wastewater treatment system.

Construction of two temporary construction compounds with associated temporary site offices, parking areas and security fencing.

Installation of one (35-year life cycle) meteorological mast with a height of 80m and a 4m lightning pole on top.

Development of on-site spoil deposition areas.

Development of an internal site drainage network and sediment control systems.

Construction of 1 no. permanent 110 kV electrical substation including 1 no. control building with welfare facilities, all associated electrical plant and equipment, security fencing and gates, all associated underground cabling, wastewater holding tank, and all ancillary structures and works.

All associated underground electrical and communications cabling connecting the wind turbines to the wind farm substation and battery arrays.

Ancillary forestry felling to facilitate construction of the development.

All works associated with the permanent connection of the wind farm to the national electricity grid comprising a 110 kV underground cable in permanent cable ducts from the proposed permanent on-site substation, commencing in the townland of Barroe and continuing onto the townlands of Carn, Rathbaun, Doonamona, Castlereagh, Rathcash, Rathowen East, Rathowen West, Killala, Magherabrack, Farragh, Cloonawillin, Mullafarry, Lisglennon and Tawnaghmore Upper to the existing Tawnaghmore 110 kV Substation in the townland of Tawnaghmore Upper.

All associated site development works including berms, landscaping, and soil excavation.

Construction of new permanent internal site access tracks and all associated drainage infrastructure.

Improvement of nine existing entrances off local roads, one off L-5173, one off L-5179, two off the local road L-5187-47, two off the local L-5187-22 and three off the L-21147-0, all to include localised widening of the road and creation of a splayed entrance to facilitate the delivery of abnormal loads and turbine component deliveries.

Construction of five new site entrances off local roads, one off the L-31143, one off the L-51791-23, one off the L-31142-0, two off the L-31142-0, and one off the L-5179-22, all to include localised widening of the road and creation of a splayed entrance to facilitate the delivery of abnormal loads and turbine component deliveries.

Upgrade works on the turbine delivery route to include the following:
Localised widening along the L-5187-47, L-31142-0, L5187-22-0, L-5187-47, L21147-0, and roads to a width of 4.5m and the widening of junctions at the crossroads R314 and L-51731 crossroads in the townland of Billoos.

This application is seeking a ten-year permission and a 35-year operational period from the date of overall commissioning of the entire wind farm.

Planning permission is being sought for an onsite 110 kV Substation and an underground Grid Connection to the existing Tawnaghmore 110 kV Substation located in Killala Business Park. This infrastructure will become an asset of the national grid under the management of EirGrid and will remain in place upon decommissioning of the Wind Farm. As part of the national grid infrastructure, their life can extend beyond the life of the windfarm and accordingly, permission is sought for the grid connection and substation in perpetuity..

In summary the Project would:

- Contribute to the 65% overall renewable energy target for the EU introduced by the REPowerEU Plan in light of the war in Ukraine.
- Contribute to assisting Ireland to increase from 42% 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 Outcome number 13 to diversify away from fossil fuels to green energy which includes wind.
- 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.
- Contribute 68.8MW, 1.15% of the current shortfall, of renewable wind energy to the national CAP2024 target of 9GW by 2030 helping to reduce the current 4.7GW shortfall.
- Comply with the Regional Spatial and Economic Strategy for the Northern and Western region's goal of producing renewable energy to tackle climate change, meet predicted growth in demand and provide energy security.
- Support the local Mayo County Development Plan 2022 - 2028 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 68.8MW of renewable wind energy.
- Contribute to rural economic development in line with the Mayo County Development Plans and of the RSES.

4 STRATEGIC IMPORTANCE AND NATIONAL INTEREST

This section outlines the need for the Project and puts it in context of its strategic importance, based on International, National and Regional policy and guidance. It also set out the relevance of the project in the national interest, recognising the need for Ireland to implement legally binding national climate change targets by encouraging appropriate renewable energy development throughout Ireland. The Project will make a valuable contribution to climate change adaptation and greenhouse gas reductions as part of the International and European 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 imported dependency increasing to 81.6% in 2022 according to the SEAI[1]. Energy demand in Ireland has been growing and is expected to continue to increase, especially electricity demand which is expected to grow by 37% to 2031[2]. Increases to the cost of carbon, supply issues and potential political insecurity increases fossil fuel price volatility. Since the Russian invasion of Ukraine, energy prices in Ireland have increased significantly. The SEAI's Electricity Prices in Ireland Report; January to June 2022[3], found on average residential electricity prices increased 10.4% in the 12 months prior to June 2022. Concern over energy costs amongst the population of Ireland is high, a survey by the Journal in October 2022[4] found that 77% of people said that they already or intend to use their home heating less often. The Economic and Social Research Institute (ESRI)[5] report on Energy Poverty published in 2022, has also warned that as many as 43% of households could now be in energy poverty, defined as when more than 10% of the household's income is spent on electricity and gas bills. Approximately 850MW of installed wind energy capacity is generated in Wind Farms in Ireland that will reach the end of their planning permissions or will have to be decommissioned between now and 2030. A recent report from Wind Energy Ireland[6] finds that between now and the end of 2030, Ireland may lose around a fifth of the total installed onshore wind energy capacity. This means that at a time when we should be accelerating

[1] SEAI. (2023). ENERGY IN IRELAND. Available here Accessed 18/12/2024

[2] EirGrid. (2022). EirGrid's Generation Capacity Statement Predicts Challenging Outlook for Ireland https://www.eirgridgroup.com/newsroom/eirgrids-generation-capac/#:~:text=The%20GCS%2C%20in%20its%20median,relatively%20consistent%20across%20the%20decade. Accessed 18/12/2024

[3] SEAI. (2022). https://www.seai.ie/publications/SEAIs-EPR-data-for-JAN-to-JUN-2022.pdf Accessed 18/12/2024.

[4] The Journal. (2022). Cost of living crisis: Most households intend to use their home heating less often this winter https://www.thejournal.ie/poll-energy-use-ireland-heating-5891701-Oct2022/ Accessed 18/122024

[5] ESRI. (2022). Energy poverty at highest recorded rate https://www.esri.ie/news/energy-poverty-at-highest-recorded-rate Accessed 18/12/2024

[6] WEI. (2024) Repowering Ireland. https://windenergyireland.com/images/files/final-repowering-ireland-report-june-2024.pdf. Accessed 25/09/24

towards our Climate Action Plan targets by increasing installed wind energy, we may end up in a position to fall backwards.

The high rate of imported fossil fuel dependency, the increasing demand for electricity, existing wind farms reaching the end of their operating life and current energy price volatility make it vital to introduce more domestic renewable energy generation, such as the Project to provide reliable, secure and affordable energy supplies in Ireland. The Project improves Irish energy security and will reduce reliance on imported fossil fuels in line with the National Energy Security Framework and the REPowerEU Plan.

4.1 The Climate Emergency

In April 2022, the Intergovernmental Panel on Climate Change (IPCC): made up of scientists from around the world, which provides regular assessments on the scientific basis of climate change, its impacts and future risks, released their AR6 report[7]. The report shows the widespread, dangerous disruptions caused by climate change in nature and shows how billions of people's lives are being impacted. It outlines how countries are falling behind on policies and actions needed to limit global temperature increases and achieve net zero emissions. Reducing carbon emissions by phasing out fossil fuels is stated as being urgently needed. Throughout the report, renewable energy such as wind is highlighted as an adaptation to displace fossils fuels and so reduce emissions and mitigate climate effects. Renewable energy is also credited with benefits such as improving air quality, reducing the cost of electricity, improving wealth and development and increasing energy security.

The Environmental Protection Agency[8] highlights that human activity has led to widespread and rapid changes in all components of the global climate system with recent extreme events in Ireland highlighting the vulnerability of individuals, communities, sectors and ecosystems to climate change and indicate an adaptation deficit.

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. There then followed the publication of the Cross-Departmental Climate Action Plan 2019 on 17th June 2019, this was revised in 2021, 2023 and 2024. The Climate Action Plan 2024 and 2025 reflects the accepted wisdom that decisive and urgent action is required to arrest the acceleration of greenhouse gas emissions within the limited window

[7] IPCC. (2022) AR6. https://www.ipcc.ch/assessment-report/ar6/ Accessed 20/12/2024

[8] EPA (2024). Ireland's Climate Change Assessment Synthesis Report https://www.epa.ie/publications/monitoring--assessment/climate-change/irelands-climate-change-assessment-synthesis-report.php

of opportunity that remains. The Plan includes a commitment to make Ireland 100% carbon neutral by 2050. It includes increased renewable electricity targets and reduction in reliance of fossil fuels and supporting the growth of private electric vehicles and meeting 80% of electricity demand, from renewable sources, all by 2030. Among the most important measures in the CAP 2024 and CAP 2025 was a target of 9GW from onshore wind, by 2030. In 2023, installed onshore wind capacity in Ireland reached 4.78GW[9]. This leaves a short fall of 4.2GW to be achieved in 7 years.

Therefore, in light of the climate emergency and legally binding targets related to emissions reductions there is a clear necessity, and it is of urgent national importance to increase the amount of energy from renewable sources, especially onshore wind, which is capable of being deployed in the near term. The Project is anticipated to have the capacity to generate between 68.8MW towards these targets, helping to mitigate the effects of the climate emergency.

4.2 International Policy Context

International energy policy is based on the demand to address climate change and reduce carbon dioxide (CO_2) emissions and, therefore, renewable energy development is a core component of the solution.

4.2.1 United Nations Framework Convention on Climate Change

The United Nations Framework Convention on Climate Change (UNFCCC)[10] implemented by the United Nations in May 1992, determined a long-term objective to lessen greenhouse gases in the atmosphere, with the purpose of preventing anthropogenic interference with the climatic system. The UNFCCC 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 convention enjoys near universal membership, with 197 countries listed as being Parties to the Convention.

The Project, by producing renewable energy, which will displace heavily polluting fossil fuels, is in line with the UNFCCC in relation to emissions reductions.

4.2.2 The Kyoto Protocol

The Kyoto Protocol came into effect in 2005, as a result of which, emissions reduction targets agreed by developed countries, including Ireland, are now binding. Under the Kyoto

[9] Statista (2023). Onshore wind energy capacity in Ireland 2008-2023. Available here Accessed 18/12/2024.
[10] The United Nations Framework Convention on Climate Change (UNFCCC) (1992). http://unfccc.int/resource/docs/convkp/conveng.pdf Accessed 18/12/2024

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.

In Doha, Qatar, on 8 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 1 January 2013 to 31 December 2020;
- A revised list of greenhouse gases ("GHG") to be reported on by Parties in the second commitment period; and
- Amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period.

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

The Project, by producing renewable energy, which will displace heavily polluting fossil fuels, is in line with the Kyoto Protocol and the Doha Amendment in relation to emissions reductions.

4.2.3 The Paris Agreement

The Paris Agreement is a legally binding international treaty on climate change. It was adopted by 196 Parties at COP 21 in Paris, on 12 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. Ireland is bound by Article 7 of the United Nations COP21 Paris Agreement, to prepare and submit periodic updates on its national adaptation and mitigation plans in the global effort to keep global warming below 1.5°C (Nationally Determined Contributions). Ireland is required to reduce greenhouse gas emissions by at least 40% by 2030 when compared with levels in

1990. The Project will contribute to Ireland meeting these targets by displacing reliance on fossil fuels.

Out of 196 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)[11] 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), in a report[12] 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. IRENA cautions that renewables growth will still need to double to reach the Paris Agreement goal of achieving net-zero emissions by 2050.

The United Nation's (UN) 26th global climate summit, held in 2021 in Glasgow, set out nations' commitments to a range of decisions in a collective effort to limit global temperatures to 1.5 degrees. The 27th Global climate summit, the COP27 UN Climate Change Conference, was held in 2022 in Egypt. At this summit, agreement was reached on financing loss and damage from the impacts of climate change. At COP28 in Dubai (Nov. 2023), it was expected that the wording of the agreement would include a stronger message on "transitioning away from fossil fuels". Although the wording of the agreement did not signify an imminent "transitioning away from fossil fuels", the agreement signals the "beginning of the end" of the fossil fuel era by laying the ground for a swift, just and equitable transition. This agreement highlights the importance of alternative, renewable energy generation projects to facilitate this transition.

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.

[11] IEA. (2021) Renewables 2021 https://www.iea.org/reports/renewables-2021 Accessed 18/12/2024
[12] IRENA. (2021) https://www.irena.org/-/media/Files/IRENA/Agency/Publication/2022/Jan/IRENA_NDCs_RE_Targets_2022.pdf Accessed 18/12/2024

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 operationalised, 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.

Ireland is one of the 196 parties to the Paris agreement. Europe's planned emission reductions in line with the Paris Agreement are set out in part under the Effort Sharing Regulation (2023/857). Under this regulation, Ireland is obliged to reduce GHG emissions by 42% in relation to 2005 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.

The above highlights the importance of alternative, renewable energy generation projects, such as this Project. By producing renewable energy, which will displace heavily polluting fossil fuels, the proposal is in line with the Paris Agreement in relation to emissions reductions to keep global warming below 1.5°C.

4.3 European Policy Context

The European Union's (EU) energy policy is based on the principles of decarbonisation, competitiveness, security of supply and sustainability. Its objectives include ensuring the functioning of the energy market and a secure energy supply within the EU, as well as promoting energy efficiency and savings, the development of renewable energies and the interconnection of energy networks[13]. The EU aims to 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 economy[14].

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.

[13] European Parliament. Energy policy: general principles. https://www.europarl.europa.eu/factsheets/en/sheet/68/energy-policy-general-principles. Accessed 20/12/2024.
[14]European Commission. https://climate.ec.europa.eu/eu-action/climate-strategies-targets/2050-long-term-strategy_en Accessed 20/12/2024

- 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.

In line with this broad outline of European Policy, the Project by producing additional renewable energy to the Irish electric system, contributes to secure energy supplies. The generation of renewable energy also helps to lower Irelands dependency on fossil fuels.

4.3.1 Renewable Energy Directive

In order to make the EU a global leader in renewable energy and ensure that the target of the final energy consumption for is achieved, the EU passed the Renewable Energy Directive (RED I) 2009/28/EC and revised it in 2018 and 2023. The amendment of the Renewable Energy Directive, which is referred to as "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 overriding public interest for renewable energy projects (Imperative Reasons for Overriding Public Interest - IROPI) on a permanent footing. Article 16f of the Directive 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 presumed to be IROPI.

Most notably, RED III obliges Member States to speed up and simplify renewable infrastructure permitting procedures by ensuring that procedures for granting permits to build, repower and operate energy assets do not exceed certain timelines, depending on the asset type, size and location. We expect that this will accordingly speed up development and transaction timelines. Furthermore, Article 16b(1) provides that the permit-granting procedure for onshore renewable energy projects outside renewables acceleration areas must not exceed two years.

It should be noted that the Project, subject of this Planning Application does not rely on Imperative Reasons of Overriding Public Interest (IROPI), as the accompanying Natura Impact Statement (NIS) has concluded, beyond reasonable scientific doubt, that the Project will not adversely affect the integrity of any European site, in view of the relevant conservation objectives. Nonetheless, the inclusion of these provisions serves to further demonstrate the essential role of renewable energy infrastructure in contributing to the European Union's legally binding target of achieving net-zero greenhouse gas emissions by 2050. This is set out in further detail below.

4.3.2 REPowerEU plan

In May 2022, the commission published The REPowerEU Plan[15] which puts forwards a set of actions to:

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

It notes that:

"*Slow and complex permitting processes are a key obstacle to unleashing the renewables revolution and for the competitiveness of the renewable energy industry"*

The REPowerEU plan also 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 2021 the EU reached a 22.8%[16] share of its gross final energy consumption from renewable sources which leaves a long way to go to reach this increased target.

[15]European Commission. (2022) https://eur-lex.europa.eu/resource.html?uri=cellar:fc930f14-d7ae-11ec-a95f-01aa75ed71a1.0001.02/DOC_1&format=PDF Accessed 18/12/2024

[16] 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 20/12/2024

In accordance with the REPowerEU Communication in May 2022, the Commission published a recommendation[17] 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. 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."

The Project, by producing renewable energy, supports the REPowerEU Plan, helping the EU to secure energy supplies, reach the increased renewable energy target and assisting in the clean energy transition.

As a Member State, Ireland has introduced significant measures under the Planning and Development Act 2024 to accelerate the granting of permits for the construction and operation of renewable energy projects. The Act affirms that where a plan or development relates to, or facilitates: (a) the construction or operation of a renewable energy plant; (b)

[17]EU. https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=PI_COM:C(2022)3219&from=EN Accessed 20/12/2024

the storage of renewable energy; or (c) the connection of renewable energy to the electricity, gas, or heat networks, such development shall be deemed necessary for IROPI, in line with the requirements of RED III. The legislation establishes a clearer distinction between categories of consent and, critically, introduces statutory timeframes for decision-making across all consent processes—including, for the first time, those handled by An Coimisiún Pleanála. These measures are intended to bring greater clarity and predictability to the planning process, benefiting both the public and stakeholders involved in the delivery of key infrastructure such as renewable energy and housing. Under the new framework, decision timelines for An Coimisiún Pleanála, when enacted, will range from 18 weeks for appeals concerning smaller-scale developments to 48 weeks for Strategic Infrastructure Developments.

The Project 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. The Project in County Mayo will have an installed capacity of 68.8 MW of renewable energy which would contribute towards the RED targets for 2030 and help to prevent further requirements to acquire statistical transfers from other Member States.

4.3.3 European Green Deal and European Climate Law

The European Green Deal (presented in 2019) is a package of policy initiatives, which aims to set the EU on the path to a green transition, with the ultimate goal of reaching climate neutrality by 2050. It supports the transformation of the EU into a fair and prosperous society with a modern and competitive economy. The European Green Deal will transform the EU into a modern, resource-efficient and competitive economy, ensuring:

- no net emissions of greenhouse gases by 2050
- economic growth decoupled from resource use
- no person and no place left behind

It focuses on 3 key principles for the clean energy transition, which will help reduce greenhouse gas emissions and enhance the quality of life of our citizens:

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

The European Climate Law writes into law the goal set out in the European Green Deal for Europe's economy and society to become climate-neutral by 2050[18]. The law also sets the intermediate target of reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels.

The Project, by producing renewable energy, is in line with the European Green Deal and European Climate Law, helping the EU to reach the goal of no net emissions by 2050.

Clean Industrial Deal 2025

This 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 National Policy Context

The EU Governance of the Energy Union and Climate Action Regulation 2018/1999 as amended requires Member States to develop integrated National Energy and Climate Plans (NECP) to cover:

1. Security, Solidarity and Trust – Working closely with Member States to diversify Europe's sources of energy and ensure energy security.

[18] European Commission. European Climate Law. https://climate.ec.europa.eu/eu-action/european-climate-law_en. Accessed 06/11/2024.

2. A fully-integrated internal energy market – Energy should flow freely across the EU, without technical or regulatory barriers. This would enable energy providers to compete freely and promote renewable energy while providing the best energy prices.
3. Energy Efficiency – Improving energy efficiency to reduce the EU's dependence on energy imports, cut emissions and drive jobs and growth.
4. Decarbonisation – Putting in place policies and legislation to cut emissions, moving towards a low-carbon economy and fulfilling the EU's commitments to the Paris Agreement on climate change.
5. Research, Innovation and Competitiveness – Supporting research and innovation in low-carbon and clean energy technologies which can boost the EU's competitiveness.

4.4.1 Climate Act

The Climate Action and Low Carbon Development Act 2015, as amended by the Climate Action and Low Carbon Development (Amendment) Act 2021 commits Ireland to reach a legally binding target of net-zero greenhouse gas 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 our national, EU and international climate goals and obligations in the near and long term.

When exercising its decision-making powers under the Planning Act, planning authorities and An Coimisiún Pleanála are obliged under s. 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 above requirement is a mandatory obligation.
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 Project, 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 Project, that favours policy goals, i.e. granting permission. The Project is supported by local, regional and national policy and will be constructed and operated in accordance with national guidance and best practice. It has also been demonstrated, in the EIAR and NIS, that the Project will not give rise to any significant effect on the environment or have an adverse effect on the integrity of European Sites.

4.4.2 Coolglass Case Study

The Supreme Court gave judgment on the Coolglass Case on 4 February 2026. It has clarified how climate obligations must be taken into account by planning authorities when making planning decisions. The judgment arose from a challenge to a decision of An Coimisiún Pleanála to refuse planning permission for a wind farm in County Laois. Coolglass Wind Farm Limited was refused planning permission. The refusal was based on the fact that granting permission would contravene the Laois County Development Plan. The Development Plan did not permit wind farms in the area.

The Developer challenged the refusal in the High Court. In doing so, it relied on the climate obligations contained under section 15(1) of the Climate Action and Low Carbon Development Act 2015 as amended by the Climate Action and Low Carbon Development (Amendment) Act 2021 (the Act). The High Court quashed the Commission's decision. As later described by the Supreme Court, the High Court prescribed a form of '*decision tree'.* This demonstrated a strong disposition in favour of the grant of permission for renewable energy projects. The Commission appealed the High Court decision to the Supreme Court.

The Supreme Court dismissed the appeal, but on significantly narrower grounds than those relied on by the High Court. In doing so, the Court provided important guidance on the interpretation and application of section 15(1) of the Act.

The Court explained that in the context of planning applications:

- It is a function of the Commission to grant or refuse planning permission, and
- That function does not replace or override the obligations of the Commission under section 15(1).

The failure to engage with section 15(1) of the Act was "*an error of law*" on the part of the Commission and was "*fatal to the validity of the decision*".

The Court remitted the planning decision to the Commission for reconsideration. It directed the Commission to assess whether it should carry out its function to grant the permission in light of its obligations under section 15(1) of the Act, even if doing so would contravene the Development Plan.

Relevant bodies must meaningfully engage with climate considerations when exercising their statutory functions. They must also ensure that their decisions fall within the spectrum of outcomes that can be viewed as consistent, insofar as practicable, with national climate objectives.

Climate objectives must be considered and addressed, but they do not automatically override development plans or other statutory requirements.
The judgment will have significant implications for planning authorities, An Coimisiún Pleanála, and numerous statutory bodies across the public sector. Climate considerations are no longer an afterthought: where relied on, they must be substantively and transparently considered and addressed.
This particular judgement is highly relevant in this project, with regard to the location of the 5 Turbines located outside the Tier 1 and Tier 2 lands of Mayo County Councils current county development plan and renewable energy strategy 2011-2020 .

The Act includes the following key elements:

- 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.
- Embeds the process of carbon budgeting into law, Government 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.
- A National Long Term Climate Action Strategy will be prepared every five years.

The Project is anticipated to have the capacity to generate 68.8MW and will contribute towards Ireland's legally binding targets in the Climate Action and Low Carbon Development Act to reduce greenhouse gas emissions 51% by 2030.

4.4.3 The Climate Action Plan 2024

The Climate Action Plan 2024[19] (CAP2024) sets out Ireland's ongoing, urgent response to the climate crisis and outlines actions to cut emissions in the electricity sector by 75% based on 2018 levels by 2030 and achieve net zero by 2050. It outlines a massive scaling up in the switch to renewable energy. The critical nature of the climate change challenge is identified in the plan as are the extensive direct and indirect threats of harm to Ireland and its people. Reducing GHGs to mitigate climate change is a key point, reiterated throughout the plan. It states that Ireland's greenhouse gas (GHG) emissions are estimated to have fallen by 1.9% in 2022 compared to 2021 but that this reduction falls short of the level of abatement required to meet national and international targets.

In the plan, the goal in the electricity sector is to make Ireland less dependent on imported fossil fuels and the plan highlights the need to remove barriers to the development of renewables, including onshore wind. The plan notes that the war in Ukraine has had a significant impact on the cost and security of our energy supply. This underlines the importance of Ireland eliminating dependency on fossil fuels and that an increase in renewable energy generation, along with supporting flexibility and demand management measures, is necessary for our future energy security. To achieve this, energy needs to be decarbonised by harnessing renewable resources, particularly wind, solar PV and biomass.

The targets set out in the CAP2024 envisages a step-up of our existing targets to meet the required level of emissions reduction by 2030, including:

- Increase electricity generated from renewable sources to 80%
- Complete the phase-out of coal and peat-fired electricity generation
- 75% reduction in overall green-house gas emissions in the electricity sector compared to 2018 levels
- Increase onshore wind to 9GW

The driving force behind this aim is the intention to facilitate a large-scale deployment of renewables that will be critical to decarbonising the power sector as well as enabling the electrification of other technologies. The plan notes that the transition away from fossil fuels and towards locally generated renewables will improve energy security and reduce Ireland's dependence on imported energy.

[19]Government of Ireland. (2024). Climate Action Plan 2024 https://www.gov.ie/en/publication/79659-climate-action-plan-2024/ accessed 20/12/2024

The CAP 2024 notes that increased renewable electricity generation will play an important role in the decarbonisation of other sectors through electrification, including transport, heating, and industry. It underlines that the transition away from fossil fuels and towards locally generated renewables will improve energy security and Irelands dependence on imported energy. The plan has measures to accelerate renewable electricity generation, this includes: *"Ensure that renewable energy generation projects and associated infrastructure are considered to be in the overriding public interest".*

These measures are in line with the REPowerEU plan and highlight the urgent need for additional renewable energy developments to reduce the reliance on fossil fuels, especially in light of the war in Ukraine and climate crisis.

One of the 'Key Metrics to Deliver Abatement in Electricity' is to accelerate flexibility. This includes the 2025 KPIs of;

- Maximum level of renewables at any one time on the grid: 85%
- Dispatch down (excluding surplus generation) of renewables below 7%.
- Minimise surplus generation
- Required long term storage (4 hour plus) in place.

The Project contributes to achieving these KPIs.

The plan notes that the deployment of renewables needs to outpace the growth in energy demand for it to deliver the absolute reductions in GHG emissions required. The demand for electricity in Ireland is predicted to grow by 19-50% in the next decade. Renewables accounted for 38.9% of electricity generated in 2022[20], this needs to increase to 80% by 2030 to achieve the national target.

Therefore, there is a clear necessity of urgent national importance to increase the amount of energy from renewable sources.

Section 12.3 outlines the projections for the energy sector. The CAP 2024 clearly outlines the need to accelerate the deployment of renewable energy:

> *"Given that the programme of large-scale offshore wind deployment is expected to be realised towards the end of the decade, deployment rates for onshore renewables will need to increase to match demand growth to ensure we keep electricity emissions within*

[20] SEAI. (2023). Energy in Ireland 2023. https://www.seai.ie/data-and-insights/seai-statistics/key-publications/energy-in-ireland/?gad_source=1&gclid=EAIaIQobChMIw_qE4JrnhQMVx5BQBh1W9wZdEAAYASAAEgIt8fD_BwE

range of the carbon budgets. This requires a major upscaling and accelerating in current deployment of renewables, particularly onshore wind.

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

Among the most important measures in the plan is a target of 9GW from onshore wind by 2030. In Dec 2023 Ireland's total onshore wind generation capacity was 4.8GW[21], leaving a shortfall of 4.2GW to be achieved in 7 years. The Project is anticipated to have the capacity to generate 68.8MW of renewable wind energy to contribute to these targets and reduce the shortfall.

CAP 2024 highlights the national obligation to increase the deployment of renewables including onshore wind to meet our legally binding sectoral emissions targets. In this regard, it makes abundantly clear that the rate of required renewable deployment is unparalleled and must be circa eight times faster in the period 2024 - 2030 than the historical average. In the EIAR submitted with this Planning Statement, the Alternatives to the Project are assessed in Chapter 3. This includes the Do-Nothing scenario in which the Project's contribution to EU and National renewable energy and greenhouse gas reduction targets would be lost, which in light of the climate emergency and energy security concerns is not a reasonable alternative to the deployment of renewable energy.

The plan identifies that increasing renewable energy will directly reduce emissions but also help with the electrification of other sectors stating:

"The electricity sector continues to face an immense challenge in meeting its requirements under the sectoral emissions ceiling, as the decarbonisation of other sectors, including transport, heating, and industry, relies to a significant degree on electrification. The deployment rates of renewable energy and grid infrastructure required to meet the carbon budget programme for electricity is unprecedented and requires urgent action across all actors to align with the national targets".

[21]Statista. (2024). Onshore wind energy capacity in Ireland 2008-2023 https://www.statista.com/statistics/868474/onshore-wind-energy-capacity-in-ireland/

The Project will help to meet this increased demand and achieve these additional emissions savings. The plan notes that the transition away from fossil fuels and towards locally generated renewables will improve energy security and Ireland's dependence on imported energy. Section 12.1.3 of the CAP2024 sets out the scale of the challenge for the electricity sector:

"At a time when the energy system is under severe pressure to ensure security of supply, amid projections of rapid electricity demand growth over the coming decade, the electricity sector has been set one of the smallest carbon budget allocations and the steepest trajectory (-75%) across all sectors. The scale of the challenge to meet the sectoral emissions ceiling is immense and requires policies to be moved from an 'end of decade' target trajectory towards a 'remaining carbon budget' target".

Further measures include policies to increase energy storage to provide for smoothing of electricity supply and demand between times of high variable renewable production and low variable renewable production. As part of the measures to accelerate flexibility in the electricity section, the CAP 2024 includes developing a policy framework for electricity storage based on electricity system needs.

The Climate Action Charter for Local Authorities is a key action in the Climate Action Plan, it commits local authorities to actions that will ensure that they play a key leadership role locally and nationally in delivering effective climate action. These actions include that in so far as is practicable local authorities will put in place practicable measures which reduce our carbon emissions in line with national objectives. It includes a commitment to ensure policies and practices at local government level lead the county towards low carbon pathways and put in place a process for carbon proofing major decisions, programmes and projects on a systematic basis, including investments in transport and energy infrastructure moving over time to a near zero carbon investment strategy.

The Project is anticipated to have the capacity to generate 68.8 MW and supports the target of doubling of onshore wind energy generation in Ireland by 2030 and contributes to the nation's target increase of renewable electricity from 30% to 80% by 2030 as set out in the Climate Action Plan 2024. The Project will contribute 68.8MW of renewable electricity or power for up to approximately 50,000 homes.

4.4.4 The Climate Action Plan 2025

The Climate Action Plan 2025[22] (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.

Irelands Progress to date:

- in 2023 emissions reduced by nearly 7%
- emissions in the first half of 2024 were down over 17%
- compared with the same period in 2023, emissions in the first half of 2024 reduced by 3.5%
- 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

CAP25 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 CAP25.

The targets are:

- onshore wind, 2GWs by 2025 and 9 GWs by 2030
- offshore wind, at least 8GWs by 2030
- solar, up to 5GW by 2025 and 8GW by 2030

These targets are unchanged for the previous two years. CAP25 states
"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."

4.4.5 The National Planning Framework - First Revision

The National Planning Framework (NPF) is the overarching policy and planning strategy for the social, economic and cultural development of Ireland. The framework aims to promote

[22]Government of Ireland. (2025). Climate Action Plan 2025
https://assets.gov.ie/static/documents/Climate_Action_Plan_2025_updated_cover.pdf [Accessed 22/04/2025]

a more environmentally focused planning system at a local level. The first revision was approved by the Oireachtas on 30 April 2025. This revision, which anticipates a population projection of between 6.1 and 6.3 million by 2040, builds upon the original 2018 NPF, reflects changes in Ireland and updates the planning framework for balanced regional development and sustainable growth. The revised NPF, along with the National Development Plan 2021, forms the overall planning and investment framework for Ireland's social, economic, and cultural development. The framework is revised and updated to take account of changes that have occurred since it was published in 2018 and to build on the framework that is in place. It is a framework to guide public and private investment, to create and promote opportunities, and to protect and enhance the environment.

The first revision to the National Planning Framework (NPF) significantly strengthens the focus on renewable energy, particularly by incorporating regional renewable electricity capacity allocations. This revision has also introduced a clearer focus on climate transition and includes more explicit references to renewable energy.

The First Revision puts an increased emphasis on the importance of renewable energy development and the infrastructure needed to support this. Chapter 9 acknowledges that the "accelerated delivery of additional renewable energy generation is…essential for Ireland to meet its climate targets."

A number of new or amended National Policy Objectives (NPOs) have been proposed in order to achieve this objective including the following:

NPO 70: to 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.

The Project is anticipated to have the capacity to generate 68.8 MW of renewable wind energy, contributes towards the national target of a zero carbon and climate resilient Ireland by 2050 by displacing greenhouse gas emitting fossil fuels and reducing Ireland's carbon footprint.

NPO 71: Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development.

The Project will contribute directly and in the long-term to the national electricity grid infrastructure by strengthening it through the addition of electrical transmission infrastructure and through renewable energy generation.
NPO 72: Support an all-island approach to the delivery of renewable electricity through interconnection of the transmission grid.

NPOs 71 and 72: provide increased support for the development, upgrading and interconnection of onshore grid infrastructure, compared with the previous NPF.

NPO 73: Support the co-location of renewable technologies with other supporting technologies and complementary land uses, including agriculture, amenity, forestry and opportunities to enhance biodiversity and promote heritage assets, at appropriate locations which are determined based upon the best available scientific evidence in line with EU and national legislative frameworks.

This is an increase in the level of support for co-location of renewables, compared with the previous NPF.

NPO 74 requires each Regional Assembly to plan, through their Regional Spatial and Economic Strategy, how and where to deliver the required capacity set out in Table 9.1 by identifying capacity allocations for each Local Authority in its area. The Northern and Western Region has 35% of the total percentage of the national share. In turn, NPO 75 requires Local Authorities to plan, through their City and County Development Plans, for the delivery of the energy capacity target that they have been allocated.

Table 9.1 from the NPF First revision (extract below) sets out these regional renewable energy capacity allocations for wind and solar energy. These targets require each region to plan for sufficient wind and solar energy development so that Ireland achieves the overall national target of 9GW onshore wind and 8GW onshore solar by 2030.

Table 9.1 | Regional Renewable Electricity Capacity Allocations

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

This significant change in national policy represents a more active and prescriptive approach to land use planning for renewable energy development, giving increased emphasis to its importance.

A Shared Goal in the NPF is the transition to a Carbon Neutral and Climate Resilient Society. The Climate Action and Low Carbon Development (Amendment) Act was enacted in 2021 with a commitment to a legally binding target to reduce greenhouse gas emissions by 51% and increase the share of electricity generated from renewable sources to 80% over the decade (2021 – 2030), and to achieve net- zero emissions no later than 2050.

This objective will shape future development in line with the National Climate Action Plan 2024 and the National Adaptation Framework. New energy systems and transmission grids will be necessary for a more distributed, renewables-focused energy generation system,

Having regard to this evaluation, each Region must plan for sufficient wind and solar energy development in order to achieve the targeted regional renewable electricity capacity allocations outlined in Table 9.1, taking into account factors influencing delivery including attrition rates and changes to energised capacity levels, (in addition to current installed energised capacity), in order to facilitate, at a minimum, the 2030 national renewable electricity generation targets.

The Framework recognises and supports that in order to meet Regional Renewable Electricity Capacity Allocations and to ensure that the electricity can be both accepted on the national grid and brought to demand users, this will require the development and expansion of the electricity grid, at a national and local level, in a coordinated manner.

Each Regional Assembly has yet to prepare a Regional Renewable Electricity Strategy (RRES), whereby additional detail will be outlined on how the regional renewable electricity capacity allocations for the region can be best achieved in a consistent and sustainable manner, including the identification of specific targets for each of the constituent local authorities.

4.4.6 The National Development Plan

On July 22nd, 2025, the Government unveiled a landmark update to its National Development Plan (NDP). The NDP guides strategic development and infrastructure investment at the national level. The 2018-2027 NDP set out investment priorities of €21.8 billion for climate action for the 10-year period, €7.6 billion, to come from the Exchequer. The remaining investment, to be made by Ireland's semi-state companies and by the private sector. In addition, some €8.6 billion funding has been made available for sustainable mobility projects, mostly in public transport. This has been a substantial funding increase and it was considered, would facilitate upscaling of investments and implementation of actions needed to move the Country towards its 2030 climate targets.

However, this new update is a bold revamp roadmap for Ireland's future that from 2026 to 2035. With a projected investment of over €275 billion, this is the largest infrastructure and capital investment programme in the history of the state.

The plan sets out €102 billion in funding for the first five years - from 2026 to 2030 -and allocates an additional €100 billion through 2035. The allocations from 2026 and 2030 for Climate and Energy is over €5.6 billion, including equity to modernise Ireland's electricity grid and water systems. The Priorities & Strategic Goals includes billions flowing into strengthening the national grid to support wind, solar, and data-driven power demand.

4.4.7 Overall conclusions

The Project makes a contribution to a significant number of policy objectives in the First Revision of the National Planning Framework, especially relevant are: 70, 71, 73, 74 and 75 in relation to renewable energy and electrical infrastructure and policy objective 69 and 93 in relation to reducing Ireland carbon footprint and greenhouse gas emissions and improving air quality. The Project contributes to policy objective 31 and 32 in relation to the rural economy and regional growth and 68 in relation to electrification. The Project is in compliance with policy objectives 67, 79, 84, 86, 87 in relation to environmental protection and biodiversity enhancement and policy objective 94 regarding the protection of population and human health including noise.

4.4.8 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.

4.4.9 National Energy and Climate Plan 2021-2030

The National Energy and Climate Plan[23] (NECP) 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 is required to be updated every two years and an updated version was released on 29th July 2024.

[23] Department of Communications, Climate Action and Environment. (2024). National Energy and Climate Plan hhttps://www.gov.ie/en/publication/a856a-national-energy-and-climate-plan-necp-2021-2030/#:~:text=National%20Energy%20and%20Climate%20Plans,the%20Governance%20of%20the%20Energy Accessed 08/12/24

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

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

The plan notes that Ireland has excellent renewable energy resources, it credits renewable energy with increasing sustainability through the use of clean power sources and enhancing energy security by reducing Ireland's dependence on imported fuels.

Key, relevant renewable energy objectives include:

- Ireland has established an objective of achieving a 34% share of renewable energy in energy consumption by 2030.
- Increase electricity generated from renewable sources to 70% (note this target has been increased to 80% in the CAP2025), underpinned by the Renewable Electricity Support Scheme (RESS). Streamline consenting and connection arrangements.
- Phase-out of coal and peat-fired electricity generation.
- Increase onshore wind capacity by up to 8.2 GW (note this target has been increased to 9 GW in the CAP2025).
- 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.

The Project, by producing renewable energy, is in line with the NECP, this helps to meet the plan objectives of reducing GHG emissions, improving energy security, phasing out fossil fuels and renewable energy targets. The project will also help meet the key renewable energy objective of increasing onshore wind capacity by up to 8.2 GW (note this target has been increased to 9 GW in the CAP2024 and CAP2025).

4.4.10 Programme for Government 2025: Securing Ireland's Future

Published in January 2025 by the Department of the Taoiseach, this is a Programme of investment and reform, backed by ambitious and credible actions, which will protect those things upon which our country values and relies, while also supporting significant progress in addressing critical social, economic, political, demographic and environmental

challenges. It commits to sustained action to tackle the climate crisis; to decarbonise the economy; and harness the digital and AI revolution to deliver effective and modern public services and to grow the economy. It commits to taking the necessary action to deliver at least 80% renewable electricity by 2030. Increased renewable energy, alongside energy efficiency and the circular economy are integral to the programme.

The Project is in compliance with Programme for Government 2025 as it provides additional renewable energy, helping to meet the commitments to increase renewable energy, reduce greenhouse gas emissions and the transition to a carbon neutral future.

4.5 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) came into effect on 31st January 2020. The objective of the RSES is to support the implementation of the National Planning Framework and the economic policies and objectives of the Government by providing a long-term planning and economic framework which shall be consistent with the National Planning Framework (NPF) and the economic policies or objectives of the Government. The RSES sets objectives at a regional level, informs the County Development Plan and Local Area Plans.

The RSES provides a development framework of the region that supports the implementation of the 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.

The Strategy recognises that energy is needed for economic growth, and access to affordable and reliable energy is an essential development objective. Historically most incremental energy demand has been met through fossil fuels, however, the Strategy recognizes that in future, energy will have to be low carbon and ultimately zero-carbon. It recognises that decarbonisation can and needs to happen and it is an objective of the NPF that Ireland becomes a Low Carbon Economy by 2050. This reflects the Governments 2014 National Policy Position on Climate Action and Low Carbon Development and is also a binding EU requirement.

The region has a huge potential for growth in renewables, with its diverse and growing environmental goods and services sector, and not least because of the proactivity and drive with which it embraces this agenda, demonstrating its commitment through the support of

test sites, innovative green policies and investing in infrastructure to support a low carbon future.

To achieve this, the Strategy states that policies must encourage:

- Practices to reduce the production of CO2;
- Increase in energy security;
- Reduced cost of electrical power for domestic purposes, and regional development of value adding of primary production;
- Increased industry development of modern high-efficiency building materials.
- Increased efficiency in the development of renewable energy production;
- Improved efficiency of freight and passenger transport systems;
- Greater protection of areas of high primary production value;
- Greater protection of environmentally sensitive areas; and
- Increase cluster of R&D focused on technological application to renewable energy.

The region has a major opportunity to play a leading role in Ireland's adaptation to climate change through the utilisation of natural assets and networks. The Northern and Western Region is a natural place that contributes the least amount of CO2 emissions overall compared to the other regions and it has the highest proportion of carbon sinks, or areas which can remove CO2 from the atmosphere, such as bogs and large areas of forestry.

The landscape of the Northern and Western Region is internationally renowned for its Mountain Ranges, dramatic coastline, beaches and inland waterway networks, including the Shannon and Corrib. The region is home to half of the State's National Parks, with many other outstanding assets, including 34 Blue Flag Beaches, Forest Parks, Trails and a growing number of established Greenways and Blueways.

The growth in domestic and overseas visitor numbers to the region's Natural Heritage assets illustrates that there is merit in continuing to develop the potential of these assets while ensuring their intrinsic value is conserved and enhanced. Ireland signed and ratified the Council of Europe's European Landscape Convention (2000), a treaty that came into effect in 2004. It recognises the importance of all landscapes, and not just exceptional landscapes, as having a crucial bearing on the quality of life and as deserving attention in landscape policy. It established that the general framework for protecting the landscape is the responsibility of the State. Ireland has since published the National Landscape Strategy for Ireland 2015 – 2025 (Dept. of Arts, Heritage and Gaeltacht), It sets out the aim of developing a National Landscape Character Assessment (LCA), which will include

guidelines, to be followed by Local Authorities developing Landscape Character Assessments of their local area or at intra local authority level, building on the National Landscape Character Assessment and using the associated Guidelines. It is important that there is a more consistent approach to landscape characterisation and amenity protection measures applied to similar classifications across the region.

Within the RSES, the Regional Policy Objectives (RPO) in relation to renewable energy are set out in **Table 4.1.**

Table 4.1: Key Planning Policy Objectives from the RSES

Regional Policy Objective (RPO)	Assessment
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.	The Project by producing renewable electricity in a rural area, provides a sustainable energy supply. The Development includes a substation and grid connection which will become an asset of the national grid, upgrading the physical electricity infrastructure in the region. The distribution bays at the Substation have the potential to power local projects, such as the proposed park and ride facilities (including EV charging facilities) at Charleville and Bruree as part of the N/M20 project. Providing renewable electricity, the Development further boosts the positive environmental effect of an increase in electronic vehicle use, including those in rural public transport services. It also increases the stability of energy supply to meet the growing demand of increased electrification.

Regional Policy Objective (RPO)	Assessment
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.	Renewable energy, wind energy in particular, is identified throughout this review as being required to play a vital role in mitigating climate change by transitioning to a low carbon economy and society. The Development will contribute to the regions electricity network by producing 68.8MW of renewable electricity. The site location has been selected for its excellent wind resource and minimal environmental impacts; these impacts have been assessed throughout the EIAR. By producing renewable energy for use in the region, the Development helps to contribute to lowering the carbon footprint of existing and new buildings. It is estimated that 46,689 of CO_2 will be displaced over the proposed 35-year lifetime of the wind farm.

With regard to Landscape Protection and Sensitivity, the Strategy is very strong. The region is host to many of the Country's National Parks, and to some significant sites beyond these Parks. In addition, the region supports a large number of sites designated for nature conservation including 215 Special Areas of Conservation (SAC), 82 Special Protection Areas (SPA), 86 Natural Heritage Areas (NHA), 21 Natural Nature Reserves and 16 Ramsar sites. In addition, there are important stepping stones and ecological corridors which are of importance to wildlife.

There is a diversity of habitats (e.g. woodlands, hedgerows, field boundaries, sand dunes, salt marshes, rivers, streams and associated riparian zones, canals, marine habitats and wetlands) that are not subject to legislative protection although they are of high biodiversity

and conservation value and contribute to the concept of "green infrastructure" which can be conserved and utilised for our health and well-being. There is potential scope to expand the range and remit of our natural assets, and there are some areas within our region which exhibit the characteristics worthy of being considered as potential National Parks/National Recreation Areas. They include: (i) the zone of influence around Benbulben in North Sligo/North Leitrim, (ii) the area surrounding Lough Arrow and Lough Key in South Sligo/North Roscommon.

- RPO 5.2 states: (a) Protect manage and conserve the quality, character and distinctiveness of our Landscapes and seascapes. (b) The Assembly supports co-operation and co-ordination between Local Authorities in determining landscape character along their borders. A targeted review should be undertaken to ensure consistency in classification and policy in adjoining areas of similar character. The NWRA will assist in collaboration and coordination. (c) Following the completion of the National Landscape Character Assessment, and any associated statutory Guidelines, the Regional Assembly shall prepare a Regional Landscape Character Assessment to promote improved landscape management and designation.

- RPO 5.3 states: The Assembly supports the consideration of the zone of: (i) North Sligo/North Leitrim (Benbulben and its hinterland); and (ii) The area surrounding and including Lough Arrow/Lough Key. as potential National Parks/National Recreation Areas. It supports collaboration in this regard with stakeholders including NPWS, Local Authorities, Dept. of Culture, Heritage and the Gaeltacht.

- RPO 5.4 states: Encourage the prioritisation of Site-Specific Conservation Objectives (SSCO) for all sites of Conservation Value, designated in EU Directive (i.e. SACs, SPAs) to integrate with the development objectives of this Strategy.

- RPO 5.5 states: Ensure efficient and sustainable use of all our natural resources, including inland waterways, peatlands, and forests in a manner which ensures a healthy society a clean environment and there is no net contribution to biodiversity loss arising from development supported in this strategy. Conserve and protect designated areas and natural heritage area. Conserve and protect European sites and their integrity.

- RPO 5.6 States: Develop awareness and create a greater appreciation of the benefits of our natural heritage, including on the health, wealth and well-being of the region's ecosystem services.

- RPO 5.7 States: Ensure that all plans, projects and activities requiring consent arising from the RSES are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.

The West Region is particularly rich in renewable energy resources. These generation sources are dispersed across the region but particularly concentrated along the western coastline. There is also a large conventional thermal generator located at Tynagh substation. The main demand centres are composed of a mix of residential, commercial and industrial demand, which is expected to grow over the period of the RSES. The existing transmission network is predominantly lower capacity 110 kV with very little higher capacity of 220 kV and 400 kV transmission infrastructure. Developing the grid will enable the transmission system to safely accommodate more diverse power flows from surplus regional generation and also to facilitate future growth in electricity demand.

These developments will strengthen the network for all electricity users, and in doing so will improve the security and quality of supply. This is particularly important if the region is to attract high technology industries that depend on a reliable, high-quality, electricity supply. The Border Region has significant renewable energy resources and supply exceeds demand, so there is an excess of generation in the area. Demand in the region, including the main urban centres, is expected to grow over the period of the RSES. The existing transmission network is composed of both 110 kV and 220 kV circuits. The existing local transmission network facilitates limited interarea power flows between Northern Ireland and Ireland via the existing 275 kV Tandragee – Louth interconnector, located within the hinterland of this region. The major project in this region is the proposed North-South Interconnector between Turleenan and Woodland substations.
The region has a pivotal role in delivering a successful transition. There are rich renewable energy resources through wind, solar and wave, along and throughout the region. The Strategy recognizes that there is still significant potential for all new outputs to our grid, but that here are however some big challenges to overcome. Those include a new regulatory environment in the guise of new Wind Energy Guidelines to replace those from 2006, and secondly, a fit for purpose transmission network able to accept, convert and transmit power to those areas of the country where demand exists. The RSES is an appropriate mechanism to integrate and manage network growth and economic growth.

- RPO 8.1 states that the Assembly will support the development of a safe, secure and reliable electricity network and the transition towards a low carbon economy centred on energy efficiency and the growth projects outlined and described in the strategy.

- RPO 8.2 states: Support the reinforcement and strengthening of the electricity transmission network with particular reference to the regionally important projects contained within Table 11.

- RPO 8.3 states: the Assembly support the necessary integration of the transmission network requirements to allow linkages with renewable energy proposals at all levels to the electricity transmission grid in a sustainable and timely manner.

- RPO 8.4 states: That reinforcements and new electricity transmission infrastructure are put in place and their provision is supported, to ensure the energy needs of future population and economic expansion within designated growth areas and across the region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs. Ensure that development minimises impacts on designated areas.

The RSES recognises and aims to support the many opportunities for wind as a major source of renewable energy. It declares that opportunities for both commercial and community wind energy projects should be harnessed, having regard to the requirements of DoHPLG Guidelines on Wind Energy. It also states that wind energy technology has an important role in delivering value and clean electricity for Ireland.

Action EL/23/2 of the Climate Action Plan, 2023 required the publication of a Renewable Electricity Spatial Policy Framework to set out targets for onshore renewable electricity to inform spatial plans and that a roadmap for the development of the Regional Electricity Strategies be published by Q4, 2023. It is noted that this has not yet been published.

As identified above, the Development is in line with the regional policies as set out in the RSES. By producing renewable energy, in a suitable location, the Development contributes to policies associated with transitioning to a low carbon economy, economic development and rural diversification. This contributes to positioning County Mayo as a leader in delivery of renewable electricity for the Northern and Western Regional Assembly region.

4.6 Mayo Renewable Energy Strategy

County Mayo has extensive renewable energy resources from wind, wave and biomass and to a lesser extent from tides, and this is recognised by the Council and the Mayo County Development Plan which has extensive objectives to support the development of renewable energy in the County. The Strategy is underpinned by Strategic Environmental Assessment

(SEA) and Habitats Directive Assessment (HDA). The SEA has evaluated five potential strategy options and their effects on the environment and designated sites, including Natura 2000 sites, and provides the justification for this Strategy. The HDA assessed the effect the Strategy would have on the conservation objectives of any Natura sites in the County and within 15km of the County boundary.

Mayo has been identified as one of the best located counties in Ireland in terms of on-shore winds. The Wind Atlas for Ireland 2003 indicates that the majority of Mayo has wind speeds that are economically viable for the harnessing of wind energy at heights 75m and 100m above ground level. The County aspires to become a key player in the energy sector, in particular to be a centre for renewable energy production and to share in the benefits that could arise. There is a clear vision for Mayo to be part of a wider national sustainable development strategy. The Renewable Energy Strategy sets out the following elements for a balanced vision for the development of renewable energy in Mayo:

- Renewable energy can help to develop an energy focus within the Mayo economy, while making a positive contribution to the reduction of greenhouse gas emissions;
- Improved awareness of energy issues should lead to a greater commitment to reducing power consumption. Underlying improvements in energy efficiency will have beneficial effects for the environment and the economy;
- The clear benefits of renewable energy cannot, however, be realised at any cost and a balance needs to be struck between economic, social and environmental interests or pressures. A key challenge is to manage this balance within a changing world. Other influences on technological change, economic expectations, social trends and ecosystem dynamics mean that each of these factors will change over the lifetime of a strategy. Dynamic judgements need to be made about what is appropriate and acceptable change; and
- This Strategy recognises that our environment is evolving constantly. Those changes have helped shape the environment as it is today and will continue to mould it for the future.

It is acknowledged that renewable energy will add a new dimension to the landscape, the economy and the availability of energy in communities. The Strategy aims to ensure that, overall, the advantages presented by renewables outweigh the disadvantages for most people and for the wider environment:

- By actively engaging in the use of renewable energy technologies, Mayo is supporting the wider aspirations of Ireland to be a world leader in the development and deployment of renewable technologies.

- Renewable energy will not solve all energy related issues, but it can make a significant contribution.

This rationale can be summarised in the following Vision statement:

"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 in the Mayo County Development Plan. The Strategy also revises and replaces the Mayo Wind Energy Strategy 2008 and the Renewable Energy policies and objectives of the Mayo County Development Plan 2008-2014.

Policies and objectives have been prepared in accordance with the principles of proper planning and sustainable development, including reduction of green house gases, maximising community benefit, ensuring minimal adverse environmental impact and taking full account of the presence and requirement to protect all Natura 2000 sites. All relevant policies and objectives in the County Development Plan will also apply when assessing planning applications for renewable energy developments.

- Objective 1.1 It is an objective of the Council to assist in achieving national targets for reducing greenhouse gas emissions associated with energy production by encouraging and promoting the reduction in energy consumption and by encouraging renewable energy developments at appropriate locations within the County, having regard to relevant planning guidance and the principles of proper planning and sustainable development and through the implementation of this Strategy.
- Objective 1.2 It is an objective of the Council to encourage renewable energy production from wind, wave, tide, biomass, biofuel, biogas, solar power, tidal, hydro and geothermal sources in the County, particularly at locations set out in the Maps

accompanying the Strategy and having regard to principles of proper planning and sustainable development.

- Policy 2 - It is the policy of the Council to ensure that a balance between the provision of renewable energy developments and the preservation and conservation of the natural and built environment is maintained, subject to compliance with the requirements of the Habitats and Birds Directives.
- Objective 2.1 It is an objective of the Council to ensure full compliance with European and National legislation in relation to renewable energy production and protection of the environment.
- Objective 2.2 It is an objective of the Council to follow a sustainable plan led approach to renewable energy development within County Mayo through the implementation of the Strategy, in particular guiding renewable energy developments to preferred locations as set out in Section 6.4 and requiring all renewable energy developments to comply with standards and mitigation measures outlined in Section 6.5.
- Objective 2.3 It is an objective of the Council that all proposed renewable developments will be assessed on the principles of proper planning and sustainable development, ensuring minimal adverse environmental impact to biodiversity, flora and fauna; population and human health; soil; water; air and climatic factors; material assets; cultural heritage; and landscape.
- Full account shall be taken of the presence and requirement to protect all Natura 2000 sites, Natural Heritage Areas, proposed Natural Heritage Areas, the National Park and Nature Reserves. Projects will be subject to Habitats Directive Assessment where considered appropriate.
- Objective 2.4 It is an objective of the Council to ensure that renewable energy developments do not interfere with, damage, remove, or impinge on the visual amenity of, existing rights of way, public walking and cycling routes, scenic routes and scenic views, architectural heritage including protected structures and Architectural Conservation Areas, archaeological heritage including recorded monuments, Ballycroy National Park and vulnerable or sensitive landscapes in the County.
- Policy 3 - It is the policy of the Council to encourage and assist in the provision of strategic infrastructure at appropriate locations to facilitate the provision and exporting of renewable energy.
- Policy 4 - It is the policy of the Council to require that renewable energy developments are carried out in a manner that promotes economic and social benefits for the community of Mayo as a whole.
- Objective 4.1 - It is an objective of the Council to ensure that the advantages presented by renewable energy development outweigh the disadvantages for the majority of the

community residing in the area of any proposed renewable energy development, and for the wider environment, when assessing planning applications for renewable energy development.

- Objective 4.2 - It is an objective of the Council to encourage community based renewable energy developments in the County having regard to the principles of proper planning and sustainable development.
- Objective 4.3 - It is an objective of the Council to require developers to incorporate the concept of community benefit into any renewable energy development proposal. Details of the particular form/model of community benefit proposed by the developer shall be submitted with the planning application for agreement by the Council at planning stage.
- Objective 4.4 It is an objective of the Council to facilitate reducing fuel poverty in the County.

A detailed study was carried out to identify potential areas for different types of renewable energy developments in the County. An evaluation of the landscape and its sensitivity for renewable energy developments was prepared. Planning considerations such as designated natural heritage areas, built heritage, scenic views/routes, cycle/walking route and populated areas and infrastructure constraints were identified. Environmental considerations arising from the strategic environmental assessment and Habitats Directive Assessment (e.g. water quality, flooding etc.) were also identified. All planning and environmental considerations in the County were plotted using GIS. Planning constraints within 15km from the Mayo County border with any adjoining local authority (i.e. Galway, Sligo and Roscommon) and town council (Castlebar, Westport, Ballina and Tuam) were also considered.

Having had regard to the above, the mapping exercise identified areas having no or low planning constraint. The Wind Atlas of Ireland was also considered ensuring that the areas selected for wind farm developments have adequate wind speeds for wind related renewable energy development. Candidate Special Areas of Conservation, Special Protection Areas, proposed Natural Heritage Areas, Architectural Conservation Areas, Protected Structures, and Recorded Monuments.

Low planning constraint may be defined as an area which presents one or two planning constraints but that can be easily mitigated against. The areas identified as suitable for particular renewable energy developments are outlined in Maps accompanying the Strategy. Each proposed development will be assessed on its impacts on the Renewable Energy Strategy. The proposals will be examined and assessed using the GIS system

developed by Mayo County Council outlined in Section 5 of the Strategy. The areas identified in the Strategy and on the Maps are considered the most appropriate for renewable energy developments. Other areas are likely to have planning and environmental constraints which would make them less suitable for renewable energy developments. In compliance with the Habitats Directive and the fact that there are alternative sites available for renewable energy development in the County, no renewable energy development will be considered on Natura 2000 sites.

Map 1 of the Strategy - Wind Energy - classifies potential areas for on-shore wind energy development. There are 4 classifications identified:

- Priority Areas are areas which have secured planning permission and where on shore wind farms can be developed immediately.
- Tier 1 - Preferred (Large Wind Farms) are areas in which the potential for large wind farms is greatest.
- Tier 1 - Preferred (Cluster of Turbines) are areas identified as being most suitable for smaller clusters of wind turbines (clusters of up to three to five turbines depending on site conditions and visual amenity).
- Tier 2 - Open for Consideration identifies areas which may be considered for wind farms or small clusters of wind turbines but where the visual impact on sensitive or vulnerable landscapes, listed highly scenic routes, scenic routes, scenic viewing points and scenic routes will be the principal consideration.

The Strategy states that the Tier 2 classification will be reviewed by the Council following a determination by EirGrid of grid infrastructure for the County. Any proposals for on-shore wind farm developments will be determined in accordance with the Wind Energy Development Guidelines (DoEHLG) 2006 or any subsequent guidelines and the requirements set out in Section 6.5 Off-shore Wind Energy.

Figure 4.1 shows the Wind Farm Site overlain on Map 8 of the Mayo RES. **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 in a non-designated area. However, these 2 no. turbines in the non-designated area are within 800m of a designated area, as shown on **Figure 4.1**.

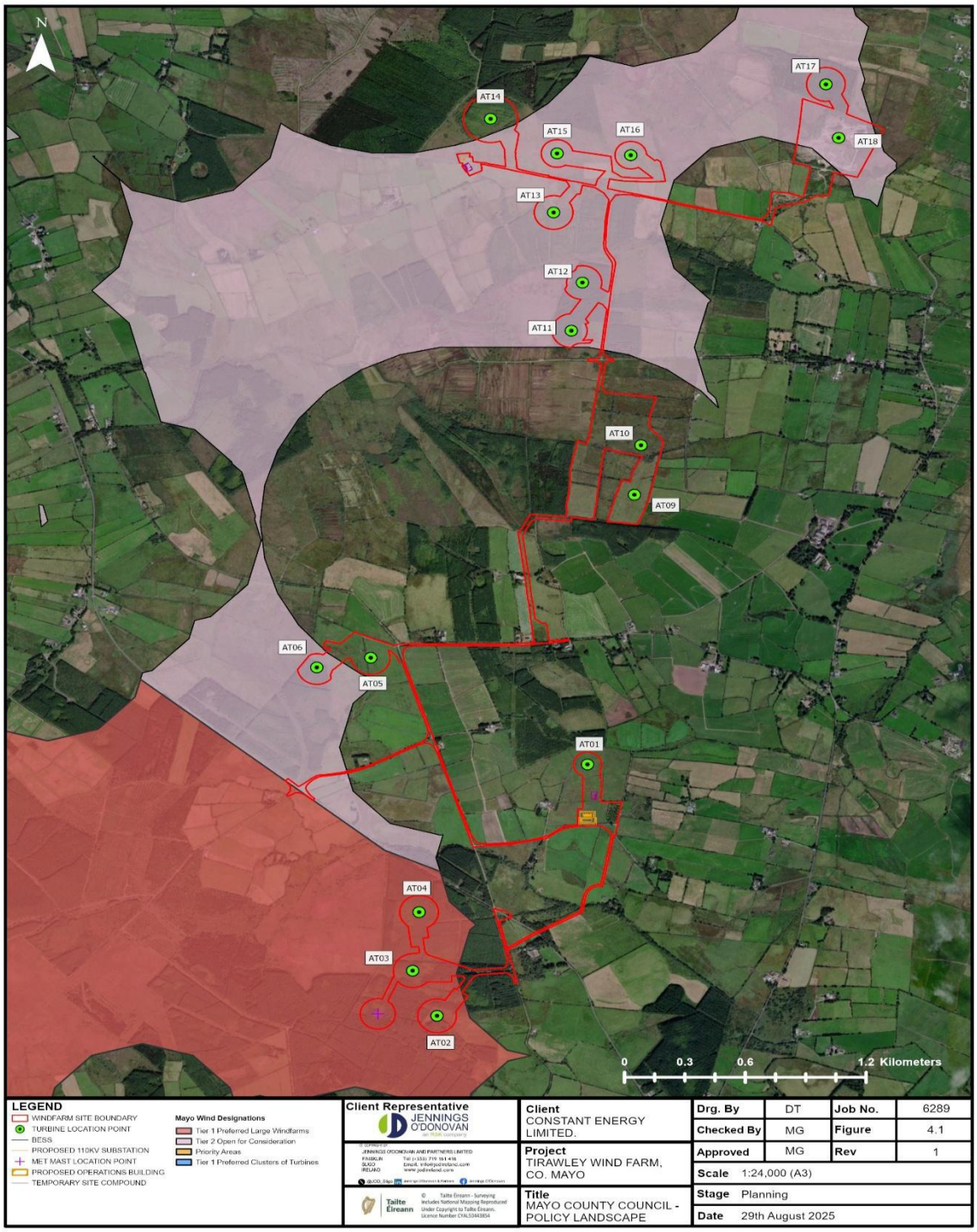


Figure 4.1: Wind Farm Site overlain on Map 8 of the Mayo RES

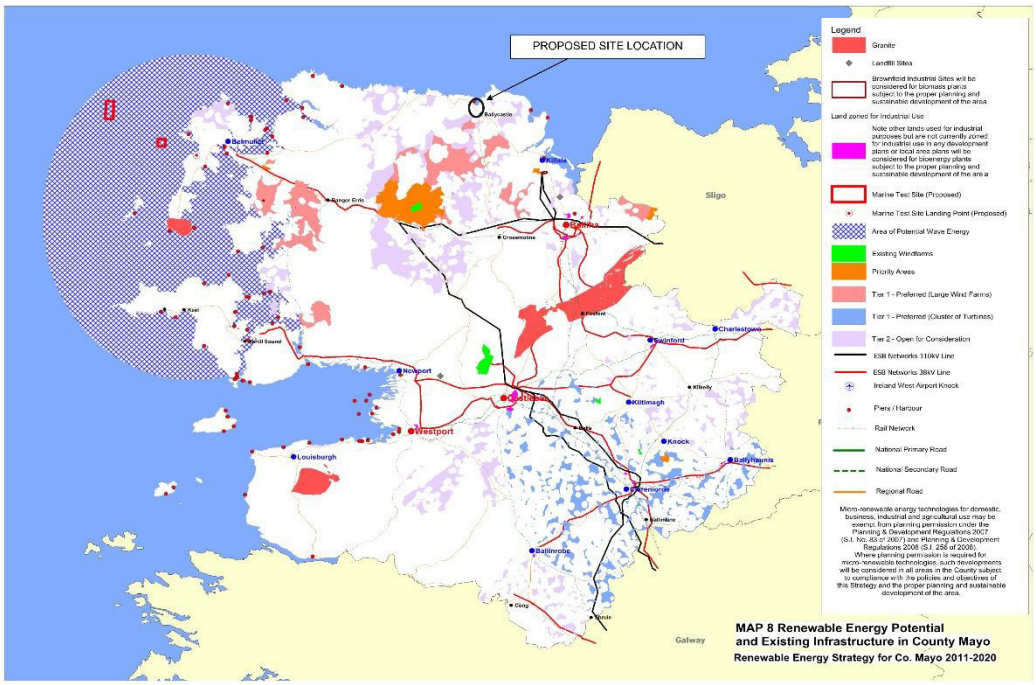


Figure 4.4 – Proposed Site Overlain on Map 8 of the Mayo RES

Figure 4.2 Wind Farm Site Location on Map 8 of the Mayo RES

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 impacts to the surrounding area (Downpatrick Head), the proximity to dwellings, impacts 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). 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.

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 January 2024 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 Planning Authority will consider all proposed renewable energy developments submitted through the planning system and, irrespective of the wind energy classifications identified within the Strategy, each will be assessed on the principles of proper planning and sustainable development.

The overall vision outlined in the RES is that of 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 Coimisiun Pleanála.

4.7 Mayo Climate Action Plan 2024 - 2029

The Climate (Amendment) Act 2021 specifically requires all local authorities in Ireland to prepare and make a Climate Action Plan. It stipulates that all local authorities need to prepare a LACAP that specifies the mitigation and adaptation measures to be adopted by the local authority for a period of 5 years. These plans will drive mitigation and adaptation measures at the local level, translating the national policy to the specific local situation in meeting the National Climate Objective. Mayo County Council recognises the need for a shift and to play its role as a key stakeholder in making the transition to a low carbon economy.

The Local Authority Climate Action Plan (LACAP) sets out how Mayo County Council will be responsible for enhancing climate resilience, increasing energy efficiency, and reducing greenhouse gas emissions, across its own assets, services, and infrastructure, for which it is fully accountable, whilst also demonstrating a broader role of influencing, advocating, and facilitating other sectors, to meet their own climate targets and ambitions. This is necessary to ensure that the environmental, social, and economic benefits that come with climate action, can be fully realised.

The LACAP sets a clear pathway for Mayo County Council to:

- Actively translate national climate policy to local circumstances with the prioritisation and acceleration of evidence-based measures;
- Assist in the delivery of the climate neutrality objective at local and community levels; and
- Identify and deliver a Decarbonisation Zone (DZ) within the local authority area to act as a test bed for a range of climate mitigation, adaptation, and biodiversity measures in a specifically defined area, through the identification of projects and outcomes that will assist in the delivery of the National Climate Objective "achieving a transition to a low-carbon, climate-resilient, and environmentally sustainable society and economy by 2050.

The Plan recognizes that Local Authorities have an important role in the delivery of both climate mitigation and adaptation measures. This is reflected in the provisions of the Climate Action and Low Carbon Development (Amendment) Act, 2021, which requires each Local Authority to prepare a LACAP, specifying the mitigation and the adaptation measures to be adopted by the Local Authority. The LACAP strengthens the links between national and international climate policy and the delivery of effective climate action at local and community levels, through place based climate action. Through its preparation and implementation, the LACAP offers an opportunity to bring together critical stakeholders across communities and businesses to build a vision for a climate neutral future. The LACAP is part of longer-term efforts that require a sustained and planned response to support the delivery of the climate neutrality objective at local and community levels. The LACAP provides a mechanism for bringing together both adaptation and mitigation actions to help drive positive climate action and outcomes across the local authority and its administrative area. The framework of climate actions set within the plan, configures the arrangement of climate actions within a defined structure that ensures alignment between on the ground actions and the high-level vision that the plan aspires to deliver.

4.8 Relevant Planning Policies from the Mayo County Development Plan 2022 -2028

The Mayo County Development Plan sets out the Council's overall strategy for the proper planning and sustainable development of County Mayo in accordance with the Planning and Development Act 2000 (as amended).

The Mayo County Development Plan 2022-2028 sets out the roadmap for the overall proper planning and sustainable development of County Mayo over the plan period. While the Plan is in place for a six-year period, it is framed having regard to the long-term development objectives of the county up until 2040, to align with national and regional spatial plans. 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 Plan builds on the review of the 2014-2020 County Development Plan and is required to set out a strategy for the growth and development of County Mayo, consistent with national and regional spatial plans. The Plan must also have regard or be consistent with national development guidelines, local strategies and programmes, and must comply with both planning and environmental legislation. The intention of this plan is to build on the development foundations already established in Mayo and to 'plant seeds' throughout to stimulate growth. With the implementation of a comprehensive monitoring regime, the second of the three development plans will provide adjustments and policy interventions that are necessary to re-align with both the NPF and RSES but will also see necessary adjustments to align with the National Marine Planning Framework. The third development plan will build on previous two plans and may require further adjustments and policy intervention to ensure alignments with the NPF and RSES.

The County Development Plan has also been informed by the preparation of three Environmental Assessments, in tandem with the plan making process. In accordance with European and National legislation, the Council has carried out a Strategic Environmental Assessment (SEA) and an Appropriate Assessment (AA) under the SEA Directive and Habitats Directive. These assessments are undertaken in order to ensure that the potential impacts of the objectives contained in the Plan on the environment can be evaluated. This process informs the content of the plan and ensures that development responds appropriately to the sensitivities and requirements of the wider natural environment. A Strategic Flood Risk Assessment (SFRA) has also been undertaken for the plan area. This provides a broad assessment of flood risk within the County and will inform strategic land use planning decisions in this and other local plans. It is considered that the development objectives in the Plan are consistent, in as far as practicable, with the conservation and protection of the environment.

Chapter 11 deals with Climate Action and Renewable Energy. The strategic aim of this chapter is to transition to a low carbon and climate resilient county, with an emphasis on reduction in energy demand and greenhouse gas emissions, through a combination of effective mitigation and adaptation responses to climate change; in addition to maximising the opportunities to become a national leader in renewable energy generation, whilst increasing the resilience of our Natural and Cultural Capital to climate change by planning and implementing appropriate adaptation measures.

Mayo County Council recognises that climate change is one of the greatest global challenges and that continual action is needed for Mayo to become a low carbon and climate resilient county. The Council has been proactive in climate action measures in the county to date. Mayo County Council were the first local authority to employ a Climate Action Officer and host to the Climate Action Regional Office (CARO) for the Atlantic Seaboard North Region. The Council, along with all 34 local authorities, has signed the Climate Action Charter committing to build climate resilience into every aspect of the work we do. The Climate Action Charter, a key measure in the Climate Action Plan (2019), commits the Council to deliver a 50% improvement in energy efficiency by 2030. The Charter requires local authorities to put in place a process for carbon-proofing major decisions, programmes and projects, including investments in transport and energy, as well as in procurement. Going forward, Mayo County Council intend to establish a carbon emissions baseline for the county over the lifetime of the plan, to help the county measure the effectiveness of the county development plan in lowering carbon emissions.

The Plan examines a number of main sectors, which set Ireland on a pathway to decarbonising the economy, of which Electricity Generation is one. These measures lay the foundations for transitioning Mayo to a low carbon, climate resilient and environmentally sustainable economy by 2050. Section 11.6.5.1 of the Plan deals with Electricity Generation. Mayo County Council will endeavour to play its part in promoting more sustainable renewable electricity generation.

Section 11.7.1 deals with Renewable Energy. Ireland has a target of 70% of electricity sourced from renewables by 2030, comprising of up to 8.2 GW onshore wind, 3.5 GW offshore wind and up to 1.5GW of solar, with a view to having a net zero energy system by 2050.

Section 11.7.3 states that the Plan recognises that Mayo County Council is a leader in the development of renewable energy, with Ireland's first commercial wind farm at Bellacorick, Co Mayo in 1992. The Council recognises that a safe, secure, sustainable and affordable supply of energy is of central importance to the economic and social wellbeing of County Mayo. Continued development of renewable energy sources in Mayo will help Ireland achieve our national targets. Mayo has an enormous wind resource with the potential to underpin an entire new economy in the county. The county generates 266MW (Q1 2020) from 15 wind farms, which is approximately 6% of Ireland's overall wind energy production. The development of the extant permissions for wind and solar energy projects in the county will significantly add to Mayo's renewable energy output.

Section 11.7.4 sets the County Mayo Renewable Energy Target. The development of renewable energy sources is central to the overall energy policy in Ireland. The 2017 'Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change' requires local authorities to indicate how development plans will contribute to realising overall national targets on renewable energy. Research carried out on behalf of the Irish Wind Energy Association (IWEA) indicates that 400 square kilometres of suitable land is available for onshore wind energy in Mayo. This figure accounts for environmental sensitivities, grid connection potential, compliance with the wind energy guidelines and other relevant planning and infrastructural considerations. Current best practice in the wind energy industry would suggest that an area of 400 square kilometres can generate a maximum potential of 10,000 MW. In setting a realistic deliverable target for a county with a high wind potential like Mayo, a minimum target of 600MW over the plan period is considered achievable. The target would meet the energy demands of existing households in Mayo, as well as the proposed additional households for the county set out in the Core Strategy Table (Chapter 2). This renewable energy target for Mayo may need to be revised over the lifetime of the Plan to ensure alignment with the Northern and Western Regional Assembly's forthcoming Renewable Energy Strategy.

Section 11.7.6 states that Mayo County Council recognises the importance of onshore and offshore wind energy as a renewable energy source and its role in meeting Ireland's national energy targets. The Council will endeavour to continue to facilitate wind energy projects that accord with the Mayo RES, the Landscape Appraisal of County Mayo and relevant Section 28 ministerial guidelines. The Council recognises that improvements are required in the existing transmission network to fully harness the County's renewable energy potential. There is also real potential for Mayo to maximise the potential by-products that can be created using wind energy such as hydrogen, agricultural fertilizer and synthetic green fuels. The Plan supports maximizing the potential of accessing new, emerging by-product markets to advance the socio-economic growth of Mayo and to help transition to a low carbon county.

Mayo County Council recognises that community ownership of wind energy projects enables local communities to benefit directly from local wind energy resources being developed in their local areas, ensuring long-term income for rural communities.

Table 4.2: Key Policies from The County Development Plan (CDP) Mayo 2022 – 2028 relevant to the Proposed Development type.

Objective/Policy	Assessment
Renewable Energy Strategy	
Climate Action Objective & Policy	
CAO 1: 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 "Irelands Transition to a Low Carbon Energy Future" (2015-2030) and any other relevant policy adopted during the lifetime of this plan.	All Government policies and legislations will be adhered to during the Proposed Development's construction, operation and decommissioning phases.
CAP 9: 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 further residential and enterprise development within the county.	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. Impacts 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.

Objective/Policy	Assessment
	Biodiversity; This is fully assessed in Chapter 6 Biodiversity and Aquatic Ecology and Chapter 7 Ornithology. The findings demonstrate that the environment can accommodate the Proposed Development without giving rise to significant biodiversity impacts. 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. 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.
Renewable Energy Objectives	
REO 2: To examine options to ensure that community benefits are derived from renewable energy development in the County.	The Proposed Development at Tirawley, under the legal entity name Constant Energy Limited will have a community benefit fund.

Objective/Policy	Assessment
REO 3: To encourage and facilitate, where possible, the production of energy from established and emerging renewable technologies.	The Proposed Development will produce energy from renewable wind energy generators.
REO 4: 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).	The Proposed Development will connect into the National Grid to export the energy produced.
REO 6: To ensure all renewable energy proposal comply with the provisions of the Mayo County Council Renewable Energy Strategy 2011-2022 (or as updated).	The Proposed Development will comply with provisions outlined in the Mayo County Council Renewable Energy Strategy 2011 – 2022.
REO 8: To encourage the development of wind energy, in accordance with Government policy, and having regard to the Landscape Appraisal of County Mayo and the Wind Energy Development Guidelines (2006) and Mayo Renewable Energy Strategy, or any revisions there of or future guidelines, and ensure consistency with the provisions of RPO 4.16 and RPO 5.2(b) of the RSES (2020-2032).	All Government and County policies, guidelines and legislations will be adhered to during the Proposed Development's construction, operation and decommissioning phases. The Wind Farm Site was selected in line with the existing policies and guidelines.
REO 22: 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.	A second connection option considered in this EIAR is a 110kV underground Interconnector cable between The Proposed Development (Tirawley Wind Farm) and a Proposed Hydrogen Plant known as the Killala Energy Hub, currently under consideration with Mayo Planning Authority (Planning Reference No. 2360266).

Objective/Policy	Assessment
REO 23: 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	The Proposed Development will have an anticipated output of 80.85 MW which will contribute to the renewable energy target for County Mayo.
Renewable Energy Policies	
REP 1: To support Ireland's renewable energy commitments outlined in national policy by facilitating the development and exploitation of a range of renewable energy sources at suitable locations within the county, where such development does not have a negative impact on the surrounding environment (including water quality), landscape, biodiversity or local amenities to ensure the long-term sustainable growth of the county.	The Proposed Developments contribution to this objective is outlined in objective CAP 9.
REP 3: To actively encourage and support the sustainable development, renewal and maintenance of energy generation infrastructure in order to maintain a secure energy supply, while protecting the landscape, archaeological and built heritage and having regard to the provisions of the Habitats Directive.	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.

Objective/Policy	Assessment
Biodiversity & Environmental Strategy	
NEO 8: To maintain, protect and where possible enhance the natural heritage and biodiversity of bogs, fens and turloughs, where appropriate, in County Mayo.	The Proposed Development is located on agricultural lands. This habitat can be partially restored using the peat spoil from any excavations on site. The Proposed Development will not spread beyond the outlined redline boundary, to protect the surrounding habitats from degradation.
NEO 9: 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.	The Proposed Development is located at a distance from any ecologically important receptors in relation to bat populations.
NEO 11: To ensure that the impact of development within or adjacent to national designated sites, Natural Heritage Areas, Ramsar Sites and 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.	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 Nature Reserves. Further details can be found in Chapter 14 Cultural Heritage.

Objective/Policy	Assessment
NEO 14: 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.	The Proposed Development includes a Habitat Management Plan (HMP) in which provides methods of protection and enhancement of habitats within the Proposed Development.
NEO 27: To ensure all development proposals are consistent with the Landscape Appraisal of County Mayo and the associated Landscape Sensitivity Matrix and future editions thereof.	The Proposed Development will comply with provisions outlined in the Landscape Appraisal of County Mayo and the associated Landscape Sensitivity Matrix.
NEO 29: Require a Landscape/Visual Impact Assessment to accompany significant proposals, located within or adjacent to sensitive landscapes, where appropriate.	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.

Development Management Standards

Volume 2 of the County Development Plan, under Section 8.8, there is an outline development management standard. It states that renewable energy developments will generally be considered where it can be demonstrated that there will not have an adverse impact on the environment or on adjoining properties, in particular on: Biodiversity, Flora and Fauna, Population and Human Health, Water Quality, Soil, Air and Climatic Factors, Material Assets, Cultural Heritage, and Landscape. Section 8.8.1 states that Planning applications for wind energy development shall be in compliance with DoEHLG Wind Energy Development Guidelines 2006 (including any new guidelines when issued) and the Renewable Energy Strategy for Mayo.

Landscape Appraisal

Volume 4 of the County Development Plan sets out the Landscape Appraisal for the County. Mayo presents a wide range of landscapes. These range from complex agricultural patterns in the lowlands with small roads and houses; to a deeply indented and islanded Atlantic coastline; to the great and often empty uplands and moorlands of the west and north of the County. Mayo has many landscapes and they have subdivided the County into its constituent parts. These are called ' Character Units'. Each of them contains an area of

land, which has similar character-giving elements such as slope, vegetation and landuse. The appearance of the landscape is relatively uniform within each Character Unit. Once identified and described these units are very useful for the consistent and clear application of policy because the effects of development will be relatively consistent within each Character Unit.

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

Identification of **Landscape Character Units (LCU)** (refer to **Table 4.3**) 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. Determination of **Landscape Sensitivities**, through the classification of physical features such as landuse, topography and visual units based in CORINE. Designation of 4 **Principal Policy Areas** 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

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.

4.8.1 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 12.4.2.4 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 4.3** below:

Table 4.3. Landscape Character Units critical landscape factors

Area D: the critical landscape factors include elevated coastal vistas, smooth terrain and low vegetation.	
Elevated Coastal Vistas: 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.
Smooth Terrain: 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.
Low Vegetation: 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	The Wind Farm Site and surrounding environments consist mainly of agricultural lands with areas of forestry. The forestry provides screening to the Proposed Development.

identifies low vegetation as a critical landscape factor.	
Area G: the critical landscape factors include undulating topography, shelter vegetation, prominent ridge lines and localised lake vistas.	
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.	The undulating topography and drumlins aid in screening the turbines across the landscape.
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.	The vegetation provides a natural visual barrier to the Proposed Development.
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	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.

ridgelines. Due to the dominating influence of ridge lines, in instances where penetration does occur, development can appear insubordinate to the landscape in which it sits.	
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.	The Proposed Development is located c. 15km north of Lough Conn. There is screening from vegetation and topography, with minimal visuals of the turbines.

4.8.1.1 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 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.

4.8.1.2 Principle Policy Areas

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

Table 4.4. Area 1 Montaine Coastal Policies and Project Influence

Mayo CDP Policy	Policy and policy influence on design
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.
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.

Mayo CDP Policy	Policy and policy influence on design
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.
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 4.5 Area 4 Drumlins and Inland Lowlands Policies and Project influence:

Mayo CDP Policy	Policy and policy influence on design
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.

Mayo CDP Policy	Policy and policy influence on design
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 21 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.
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.

Mayo CDP Policy	Policy and policy influence on design
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.

4.8.1.3 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. 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.

4.8.1.4 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.

Compliance with Local policy

The Project will generate renewable energy, reducing Ireland's carbon footprint by displacing fossil fuels and contributing to climate policy mitigation objectives. The Project is compliant with local policy as it is supported by policies in the Mayo County Development Plan to increase and support renewable energy developments at a local level, while avoiding significant environmental or visual impacts.

Other Core Planning Policy Documents

***The Wind Energy Development Guidelines* - 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.

The Developer has had regard to the Draft Wind Energy Guidelines 2019, however as stated, the current version dated 2006 remain valid until the revised, final version of the Draft WEDGs (DOHLGH, 2019) are published by the government. The draft guidelines 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:

- 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

IWEA Best Practice Guidelines for the Irish Wind Energy Industry 2012

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

IWEA Best Practice Principles in Community Engagement and Community Commitment 2013

Following on from the IWEA published Best Practice Guidelines in March 2012, the Association extended its guidance with the publication of this Best Practice in Community Engagement and Commitment. IWEA and its members support the provision of financial contributions by wind farm operators to local communities and have sought to formulate best practice principles for the provision of a community commitment. The document sets out IWEA's best practice principles for delivering extended benefits to local communities for wind farm developments of 5MW or above. Best Practice Principles of community engagement when planning the engagement strategy and preparing associated literature are also outlined in the document. The aim of these guidelines is to see that the views of local communities are taken into account at all stages of a development and that local communities can share in the benefits. Community engagement was carried out in accordance with the 2013 IWEA Guidelines. Details of the community engagement and financial contributions undertaken by the developer are outlined in **Appendix 1.6.**

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

- Noise impacts (assessed in **Chapter 11: Noise of the EIAR**) are in line with the 2006 guidelines.
- To avoid shadow flicker at nearby dwellings, assessment and mitigation measures have also been included in the project, in line with the 2006 guidelines and with regard to the draft 2019 guidelines, full details of this can be found in **Chapter 5: Population and Human Health** and **Chapter 14: Shadow Flicker of the EIAR**
- 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 1.5**.
- Community Benefit: Establishing a community fund of up to €250,000 annually in the first 15 years of operation that will be administered by a management committee including local community representatives, in line with the Renewable Energy Support Scheme (RESS) Community Benefit Fund Good Practice Principles published in 2021[24].

4.8.2 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.

[24] Government of Ireland. (2021) https://www.gov.ie/en/publication/5f12f-community-projects-and-benefit-funds-ress/ Accessed 07/2/2024

- 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**.

5 MATERIAL PLANNING CONSIDERATIONS

The planning application will be considered on the basis of the proper planning and sustainable development of the area and on the likely effects of the Project on the environment. The EIAR concluded that the Project will have no significant effects on population and human health, biodiversity, aquatic ecology, soils and geology, hydrology and hydrogeology, noise and vibration, landscape and visuals, air quality and climate, archaeology and cultural heritage, material assets and traffic and Transport.

On the basis of the assessment set out in the NIS, it is respectfully submitted that the competent authority will be in a position to determine that no reasonable scientific doubt remains, that the Proposed Project will not adversely affect the integrity of any European site, in view of the conservation objectives of that site.

5.1 The National Interest and Strategic Importance

The project will make a valuable contribution to climate change adaptation and greenhouse gas reductions as part of the international and European 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 80% in 2021. Energy demand in Ireland has been growing and is expected to continue to increase, especially electricity demand which is expected to grow by 37% to 2031. Increases to the cost of carbon, supply issues and potential political insecurity increases fossil fuel price volatility. Since the Russian invasion of Ukraine, energy prices in Ireland have increased significantly. The SEAI's Electricity Prices in Ireland Report;

January to June 2022, found on average residential electricity prices increased 10.4% in the 12 months prior to June 2022. The Economic and Social Research Institute (ESRI) 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 Project, to provide reliable, secure and affordable energy supplies in Ireland. The project could improve Irish energy security and reduce reliance on imported fossil fuels in line with the National Energy Security Framework and the REPowerEU Plan.

The construction of the project 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.

5.2 Importance of the Project

The Project would represent a strategically significant investment in the locality of County Mayo and the wider western region. The Project will provide a significant economic benefit to both the Irish and local economies. The Project provides 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.

The influence of the Project on the de-carbonisation of the electricity network will contribute positively to an issue of strategic social importance. This is illustrated by the text of the Irish government's recent Climate Action Plan 2024 which sets an ambitious 80% target for electricity production from renewable sources by 2030 and highlights the need to remove barriers to the development of renewables, including onshore wind, such as streamlining regulation and encouraging reinforcement of the grid to facilitate greater renewables penetration. The significance of the action plan is underlined by the Irish government's 2019 declaration of a climate emergency.

The RSES recognises and aims to support the many opportunities for wind as a major source of renewable energy. It declares that opportunities for both commercial and community wind energy projects should be harnessed, having regard to the requirements of the 2006 DoHPLG Guidelines on Wind Energy.

As a form of sustainable energy, and with an anticipated output of 68.8MW, the Project will contribute to the renewable energy targets in County Mayo and in the Northern and Western Regional Assembly Area.

The Project will be a significant regional project providing a sizeable economic benefit through local investment, employment, local authority rates, and a local community benefit funds in accordance with Government, regional and local planning policies.

Wind Energy Ireland produced a report on The Economic Impact of Onshore Wind in Ireland[25] which illustrated that the onshore wind industry in 2020 supported over 5000 jobs and by 2030 there is a potential to increase this to over 7000, as shown in **Figure 4.3** The report also outlines the current benefits of onshore wind along with how far Ireland has to go to reach binding targets. Note that the installed capacity needs to nearly double within a ten year period.

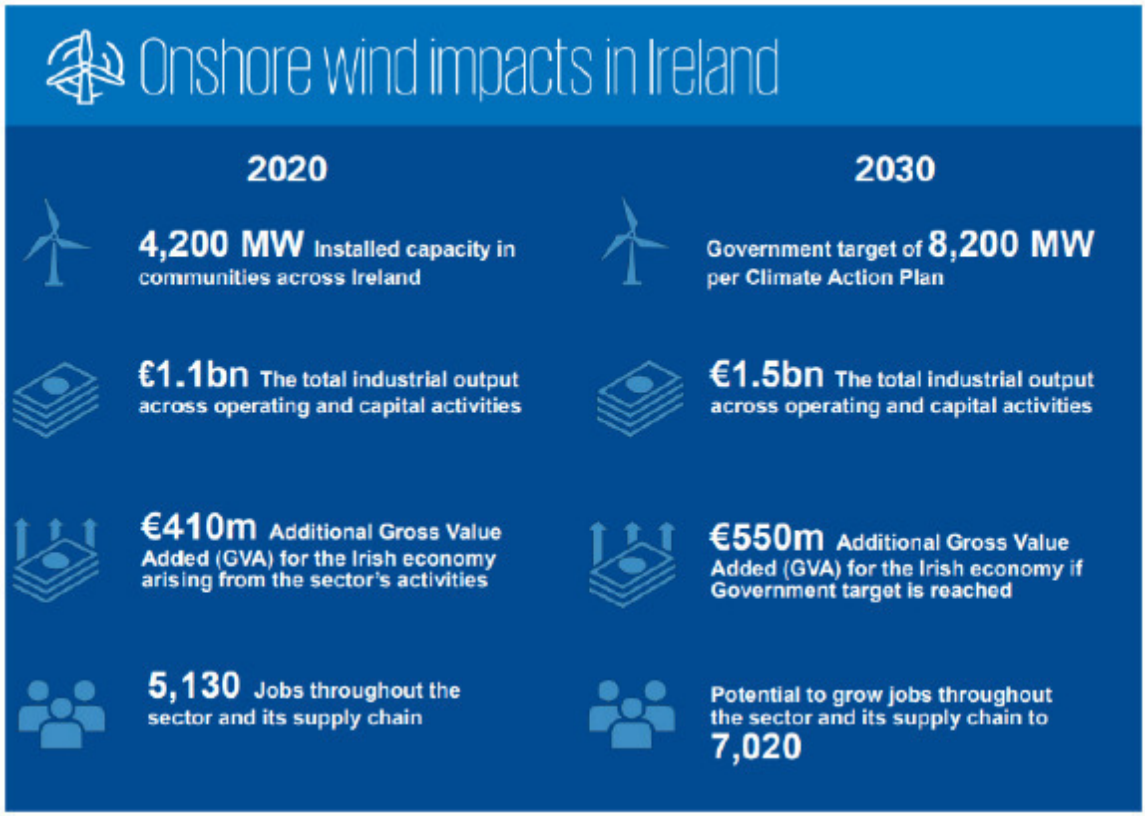


Figure 4.3: Onshore Wind Impacts in Ireland (from the Economic Impact of Onshore Wind in Ireland Figure 1.6)

[25] WEI. (2021). The Economic Impact of Onshore Wind in Ireland https://windenergyireland.com/images/files/economic-impact-of-onshore-wind-in-ireland.pdf Accessed 01/11/2024

The construction of the Project will 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.

The Project will make a valuable contribution to climate change adaptation and greenhouse gas reductions as part of the international and European 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 80% in 2021[26]. Energy demand in Ireland has been growing and is expected to continue to increase, especially electricity demand which is expected to grow by 37% to 2031[27]. Increases to the cost of carbon, supply issues and potential political insecurity increases fossil fuel price volatility. Since the Russian invasion of Ukraine, energy prices in Ireland have increased significantly. The SEAI's Electricity Prices in Ireland Report; January to June 2022[28], found on average residential electricity prices increased 10.4% in the 12 months prior to June 2022. The Economic and Social Research Institute (ESRI) report on Energy Poverty published in 2022[29], 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 Project, to provide reliable, secure and affordable energy supplies in Ireland. The Project could improve Irish energy security and reduce reliance on imported fossil fuels in line with the National Energy Security Framework (4.6.3.2) and the REPowerEU Plan (Section 4.5.3).

The construction of the Project 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.

[26] SEAI. (2022). ENERGY IN IRELAND. https://www.seai.ie/data-and-insights/seai-statistics/key-publications/energy-in-ireland/?gclid=EAIaIQobChMI-LH_o6r8_QIV09_tCh23YAykEAAYASAAEgJipvD_BwE Accessed 07/01/2024

[27] EirGrid. (2022). EirGrid's Generation Capacity Statement Predicts Challenging Outlook for Ireland https://www.eirgridgroup.com/newsroom/eirgrids-generation-capac/#:~:text=The%20GCS%2C%20in%20its%20median,relatively%20consistent%20across%20the%20decade. Accessed 07/01/2024

[28] SEAI. (2022). https://www.seai.ie/publications/SEAIs-EPR-data-for-JAN-to-JUN-2022.pdf Accessed 07/02/2024

[29] ESRI. (2022). Energy poverty at highest recorded rate https://www.esri.ie/news/energy-poverty-at-highest-recorded-rate Accessed 07/01/2024

5.3 Project as Sustainable Development

The Project is an example of sustainable development, enshrined in the National Planning Framework First Revision. 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 Report. There are three facets to sustainable development which are economic, social and environmental as defined by the UN Sustainable Development Agenda. The Project meets each of the three facets of sustainable development as laid out in **Table 4.6**.

Table 4.6: The Project as Sustainable Development

Economic Role	The Project provides the opportunity to reinforce the existing local renewable energy industry knowledge and skills base by providing new jobs in the industry, providing the stability and diversity to the rural economy that can stimulate further development by attracting new business to the region due to the improved supply of electricity, enabling diversification. The Project will have a positive economic impact with several Irish firms commissioned to work on the design, environmental assessment and planning. The construction and operational phases will also create jobs locally and nationally and will lead to further economic development. The Project represents a strategically significant investment in the locality.

Social Role	The influence of the Project 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 Project will also create jobs up to 60 direct and indirect jobs during the construction periods. The Project will also promote economic development and rural diversification. A community benefit fund will be set up which will allocate funds from the wind farm to community groups in the area should the wind farm be granted planning and be successful under the Government's Renewable Electricity Support Scheme (RESS) support programme. Further details can be found in **Chapter 1: Introduction** and **Appendix 1.6**. The impact of the Project to the de-carbonisation of the Irish electricity network is a positive contribution to an issue of strategic social importance. This is illustrated by the Climate Action Plan 2024 which sets an 80% target for electricity production from renewable sources by 2030 and highlights the need to remove barriers to the development of renewables, including onshore wind, such as streamlining regulation and encouraging reinforcement of the grid to facilitate greater renewables penetration. The significance of the action plan is further underlined by the Irish government's recent declaration of a climate emergency. The deployment of modern, efficient wind turbine technology, which is currently the cheapest form of new generation, will also contribute to reducing the cost of energy and benefit Irish consumers through lower energy prices. The Project has the potential to bring significant positive benefits to local communities. It will support sustainable local employment; it will contribute annual rates to the local authority; and it will provide opportunity for local community investment in the project in line with the new Renewable Energy Support Scheme (RESS). This is a Government of Ireland initiative that provides support to renewable energy projects in Ireland. A Community Benefit Fund will be put in

	place for the RESS period (i.e., 15 years of the operation) of the Project to provide direct funding to those areas surrounding the Project. The significant annual community benefit fund will be established in line with Government policy which will include funding for both wider community initiatives and a Near Neighbour scheme focused on houses in close proximity to the Project. The additional renewable energy that the Project will generate will help support Ireland's wider low carbon transition. It will help to meet the additional electrical demand that will be created by the electrification of the transport and heating networks and the growing tech industry installations such as data centres.
Environmental Role	The Project has been assessed in terms of its impact on the environment, where impacts have been identified, the design has been amended and mitigation implemented to avoid, prevent and reduce adverse impacts and maximise positive impacts. Overall, the EIAR sets out that the environmental effects arising from the Project can be satisfactorily mitigated. The findings demonstrate that the environment can accommodate the Project without giving rise to significant environmental impacts in line with the Mayo County Development Plan 2022 -2028 objectives as well as regional, national and international policy. The NIS concludes that the proposed Project, either alone or in combination with other plans and projects, would not adversely affect the integrity of European sites, in view of the sites' conservation objectives and there is no reasonable scientific doubt as to the absence of such effects.

The Project has been conceived and designed to align within the planning and sustainable development objectives of the local area. The success of this is documented in comprehensive detail through the EIAR. and illustrated in **Table 4.1** which shows compliance with the provisions of the Mayo County Development Plan 2022 -2028.

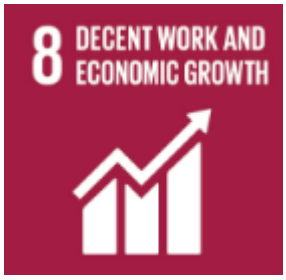
The planning application shows that the Project provides an excellent opportunity to stimulate continued and additional investment to maximise beneficial impact towards national targets, while also minimising the resulting environmental effects.

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 SDGs are the blueprint to achieve a better and more sustainable future for all. They address the global challenges we face, including poverty, inequality, climate change, environmental degradation, peace and justice.

The Project positively contributes to the following UN SDGs:

By producing renewable energy, the Project 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.

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



The Project is a renewable energy enterprise, representing a multi-million-euro investment into the Southern Region. This could attract new enterprise to the county, bringing jobs and economic growth.

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

The renewable energy that the Project will generate will help support Ireland's low carbon transition and reduce anthropogenic greenhouse gases.

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

6 CONCLUSION

Throughout this Planning Statement, renewable energy is identified as being required to play a vital role in mitigating climate change by transitioning to a carbon neutral 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, the challenges to energy security giving rise to the adoption of RED III and the renewable energy policy adopted at a European, national, regional and local level, provides strong policy support for renewable energy development. The Project contributes to supplying the national demand for renewable energy, which in the context of the ongoing climate emergency is an urgent Irish national priority.

Furthermore, pursuant to section 15 of the Climate Act, the Commission is obliged, in so far as is practicable to perform its function in a manner consistent with CAP 2025, the National Energy & Climate Plan 2021 – 2030 and other listed national climate mitigation and adaptation plans. The recent High Court decision in the Coolglass case confirmed the imperative nature of the obligation placed on public bodies to exercise their discretionary powers in "such a way as to support the outcome favouring climate goals" unless precluded by a "mandatory and non-fixable legal requirement" (which it is submitted is not the case here).

The Project will provide 68.8MW 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 Project 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 target for renewable energy achieving 12% instead of 16% of overall renewable energy share. There is a clear national mandate to accommodate significant onshore wind within the next decade with the Climate Action Plan 2024 setting a 9GW target for installed wind energy capacity

by 2030. In December 2024 this was 4.8GW in the Republic of Ireland, leaving a shortfall of 4.2GW to be achieved over 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 Regional Spatial and Economic Strategy (RSES) for the Southern 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 Mayo County Development Plan reinforces the national and regional energy policies.

The Project meets the definition of sustainable development as defined by the National Planning Framework 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 Project process adopted by the Developer has represented a best practice approach to a renewable energy scheme design, minimising the potential impact through multiple design iterations and modifications to minimise the impact on the receiving environment, as shown in the chapter on Alternatives of the EIAR. This ensures compliance with the suite of planning policies and objectives of the LDP 2022 - 2028. The layout of the Project presented in the Planning Application and EIAR represents the optimum fit with the technical and environmental parameters of this Project.

Environmental Impacts have been considered within this EIAR and through the process of assessment, embedded mitigation, and additional proposed mitigation outlined in the EIAR, NIS, CEMP and Biodiversity Enhancement and Management Plan, it has been shown that the Project can be constructed and operated and decommissioned without likely significant effects arising, demonstrating the acceptability of the proposal.

The Project is compliant with International, European and National policy on energy security, emissions reductions and renewable energy production. It has reviewed policy for the Southern region and local County Limerick policies and finds the Project complies with key renewable energy and environmental policy objectives.

The Project 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 as outlined in section 4.6 of this chapter.

The Project also meets the UN's definition of Sustainable Development in terms of the three sustainability pillars; Economy, Environment and Social.

This Planning Statement outlines how the Project is compliant with International, European and National policy on energy security, emissions reductions and renewable energy production. It reviews policy for the Southern region and Limerick County policies and finds that the Project complies with key renewable energy, landscape and environmental policy objectives. In this regard, the Project:

The development process adopted by the Applicant has represented a best practice approach to a renewable energy scheme design, minimising the potential impact on the receiving environment through multiple design iterations. The proposed layout represents the optimum fit with the technical and environmental parameters of this project and this site. Furthermore, the embedded mitigation, mitigation by avoidance and reduction and compensation through management and restoration of degraded habitats as outlined in the EIAR, CEMP and Biodiversity Enhancement Management Plan are considered to adequately mitigate the predicted environmental effects.

Overall, it is considered that the Project aligns with international, European, national and local policy.

APPENDIX A:

TIRAWLEY COMPLETENESS CHECKLIST

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Item No.	Section	Information Required	Reference/Response
1	Public Notice	Time Period for Consultation and Fee for Submissions	Included in the Public Notice
2	Public Notice	Standalone Website Address	Included in the Public Notice
3	Public Notice	EIAR and NIS referenced	Included in the Public Notice
4	Public Notice	Reference to Section 37JA	Included in the Public Notice
5	Public Notice	All townlands within the site boundary to be correctly referenced.	Included in the Public Notice
6	Prescribed Bodies	Notification of All Prescribed Bodies and a copy of the correspondence sent to same.	Notifictaion Letters Sent to Prescribed Bodies 30th April 2026 via email
7	Land Ownership	Interest in land	Applications land and Other landowners involved in the Proposed Development
8	Land Ownership	Written consent of all other landowners (Inc. legally binding agreement & land registry map if required)	Copies of Letters are included as part of the planning documents
9	Design Flexibility	Design flexibility not sought.	Confirmed Design Flexibility is not being sought
10	Fee		Copy of Eletronic Transfer by Applicant to APC Attached
11	EIA Portal	Letter from Portal	EIA Confirmation Number: 2026065
12	Planning Statement	Renewable Energy Designation Policy Statement	Refer to Planning Statement
13	Planning Statement	Statement outlining compliance with all relevant policies and objectives in the County Plan including a justification for material contravention of same if relevant.	Refer to Planning Statement
14	Planning Statement	Consultation overview	Refer to Planning Statement and Appendix 1.6 Community Engagement Report.
15	Planning Statement	Community Benefit Fund	Refer to Planning Statement Section 4.5
16	Planning Statement	Planning history	Refer to Planniing Statement Section 2.3
17	Planning Statement	Planning status of existing (disused) quarry within the proposed development site	Refer to Planning Statement Section 2.4 Constant Energys Planning Representitive met with Mayo County Council Quarry Officer Barry Freeman on the 5th March 2026 regarding the planning status of the quarry within the site boundary. For the purposes of this application to the Coimisiun it was agreed with Mayo County Council that the status of the quarry is abandoned.
18	Drawings	Drawing Schedule	Refer to Drawing Schedule for all drawings related to the planning application
19	Drawings	Site location map	Refer to Drawing Schedule - Site Location Map Sheet 1 to 14
20	Drawings	Site layout plan	Refer to Drawing Schedule - Site Layout Plan Sheet 1 to 9
21	Drawings	Site Layout plan detailing the internal site separation distances between individual turbine rotor diameters in the crosswind and prevailing downwind direction and from adjoining site boundaries	Refer to Drawing Schedule - Site Layout Plan Sheet 1 to 9
22	Drawings	Plans, elevations, sections and cross-sections	Refer to Drawing Schedule for all Plans, Elevations, Details, Sections and Cross Sections related to the Proposed Development
23	Drawings	Wayleaves shown	Refer to Landowner Letters, all land and landowners accociated with the Proposed Development have no Wayleaves within the Redline Boundary. The majority of site access is via public roads.
24	Drawings	Grid Connection Route	Refer to Drawing Schedule - Grid Connection Route Sheet 1 to 17
25	Drawings	Scales appropriate	As note on each drawing title block and confirmed with samples sent to the Coimisiun in advance of lodging application
26	EIAR (General)	One turbine type (Vesta V117 with a tip height of 135m, a rotor diameter of 117m, and a hub height of 76.5m with an individual turbine output of 4.3 MW), BESS and grid connection to be assessed.	Defined in Chapter 2 (Project Description) and assessed throughout all technical chapters and associated appendices of the EIAR
27	EIAR (General)	Non-Technical Summary: Provided as a standalone section.	NTS (Non-Technical Summary) – Provided as a standalone document in Volume 1 of the EIAR.
28	EIAR (General)	Introduction: Legislative context	EIAR Chapter 1 Introduction (Section 1.6.1 – Legislative Context and Planning Policy)
29	EIAR (General)	Scoping Consultation	EIAR Chapter 1 Introduction Section 1.11 and Appendix 1.3: Scoping Opinion
30	EIAR (General)	Community Engagement Report addressing best practice requirements of REP 4, Chapter 11 of Mayo CDP.	Refer to Chapter 1 Introducion Appendix 1.6 Community Engagement Report
31	EIAR (General)	Methodology/methodologies for the assessment of the environmental factors and for the description and consideration of the significance of effects	Refer to 'Assessment Methodology' section within each technical chapter of the EIAR (Chapters 3–17)
32	EIAR (General)	Study Area(s) and justification for same.	Defined in EIAR Chapter 1 Introduction and specifically justified within the 'Study Area' section of each individual technical chapter.
33	Description of Proposed Development	Project Team (Author qualifications, experience and expertise)	Refer to Chapter 2 Project Description Section 2.2.1 Statement of Authority
34	Description of Proposed Development	Technical Difficulties/Limitations	Refer to Chapter 2 Project Description Section 2.4.6 Technical Difficulties/Limitations
35	Description of Proposed Development	Detailed description (all stages) of the characteristics of the proposed development including use of natural resources, production of waste, emissions & disturbances	Volume I through to Volume V of the EIAR covers all stages of the characteristics of the proposed development including use of natural resources, production of waste, emissions & disturbances
36	Description of Proposed Development	Table and map identifying the nearest sensitive/residential receptor and separation distances to each turbine (Format, references and information to be correlated with noise and shadow flicker analysis).	Refer to Chapter 5 Population and Human Health, Chapter 11 Noise and Chapter 15 Shadow Flicker
37	Description of Proposed Development	Construction Environmental Management Plan	Refer to CEMP and Mangement Plans 1 to 7
38	Description of Proposed Development	Decommissioning Plan	Refer to CEMP and Mangement Plan 6
39	Description of Proposed Development	Waste & Resource Management Plan	Refer to CEMP and Mangement Plan 5
40	Consideration of Alternatives	Site selection & design process	Refer to Chapter 3 Alternatives Considered
41	Consideration of Alternatives	Reasonable alternatives considered (Layout, scale, technologies, grid connection, turbine delivery, substation infrastructure, construction methodology etc)	Refer to Chapter 3 Alternatives Considered
42	Population and Human Health	Population & Settlement Patterns	Refer to Chapter 5 Population and Human Health Section 5.3.1 and 5.4.1, 5.5.2 and 5.5.8
43	Population and Human Health	Economic Activity & Employment	Refer to Chapter 5 Population and Human Health Sections 5.3, 5.4 and 5.5
44	Population and Human Health	Tourism & Amenities (Inc. recreational trails/waterways)	Refer to Chapter 5 Population and Human Health Sections 5.3, 5.4 and 5.5
45	Population and Human Health	Human Health & Wellbeing (Reference Studies)	Refer to Chapter 5 Population and Human Health Sections 5.3, 5.4 and 5.5
46	Population and Human Health	Property Devaluation/House Prices	Refer to Chapter 5 Population and Human Health Sections 5.3, 5.4 and 5.5
47	Biodiversity	Derogations (Required/Obtained)	None required for bats or rare plants
48	Biodiversity	Ecological Impact Assessment	Refer to Chapter 6 - Updated to reflect final layout
49	Biodiversity	Biodiversity Enhancement Areas	Refer to Chapter 6, Appendic 6.4 for BEMP

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Item No.	Section	Information Required	Reference/Response
50	Biodiversity	Bat Surveys (to include) a min. of 30 days in each season, in a variety of weather conditions with detectors at different height levels.	Refer to Chapter 6, Appendix 6.2 for full details of bat surveys
51	Biodiversity	Invasive Species Management Plan	Refer to Chapter 6, section 6.5.8 Invasive Species
52	Biodiversity	Terrestrial Surveys (Habitat & ecology (inc protected flora, invasive plant species, mammals, amphibians and reptiles)	Refer to Chapter 6, section 6.2.7 Field surveys, and 6.3 Baseline Ecological Conditions
53	Biodiversity	Aquatic Surveys (Habitat & ecology (inc river habitat, macroinvertebrate, electro-fishing, fisheries))	Refer to Chapter 6, Appendix 6.3 for full details of aquatic surveys
54	Biodiversity	Justification for surveys (if not up to date as per best practice)	Refer to Chapter 6, Appendic 6.5 'Note on Lifespan of Baseline Ecological Survey Data'
55	Ornithology	Surveys (Vantage Point, Breeding & non-breeding, hinterland, Dusk, Walkover, Roost & Winter surveys)	Refer to Chapter 7, section 7.2 Methods for full details of the ornithological surveys carried out
56	Ornithology	Justification for surveys (if not up to date as per best practice)	Refer to Chapter 6, Appendix 6.5 - Note on Lifespan of Baseline Ecological Survey Data
57	Ornithology	Connectivity with European Sites	Refer to Chapter 7.3.1 Special Protection Areas, and AA Screening Report and NIS for full details
58	Ornithology	Up to date Collision Risk Model (CRM) Assessment (NatureScot 2024)	Refer to Chapter 7, section 7.4.3.1 Collision, and Appendix 7.9 for details of CRM following updated 2024 NatureScot Guidance
59	Ornithology	Monitoring Programme	Refer to Chapter 7, section 7.8 Monitoring for details
60	Ornithology	Cumulative Assessment	Refer to Chapter 7, section 7.5 Cumulative Effects for details
61	Noise and Vibration	Baseline Noise Levels	Refer to Chapter 11 Noise Appendix 11
62	Noise and Vibration	Map of all receptors within 4 x Tip of Turbines with distance measurements	Refer to Chapter 11 Noise Section 11.3
63	Noise and Vibration	Predicted Noise Levels	Refer to Chapter 11 Noise Section 11.2
64	Noise and Vibration	Proposed Noise Limits (cumulative)	Refer to Chapter 11 Noise Section 11.2
65	Noise and Vibration	Operational Noise Monitoring Proposal	Refer to Chapter 11 Noise Section 11.5.4.2
66	Noise and Vibration	Curtailment Strategy for exceedances	Refer to Chapter 11 Noise Section 11.2
67	Noise and Vibration	Mitigation Strategy for Operational Amplitude Modulation and Tonal Noises	Refer to Chapter 11 Noise Section 11.5.4.2 and section 11.5 and 11.7
68	Noise and Vibration	Cumulative Noise Assessment	Refer to Chapter 11 Noise Section 11.4 and 11.5
69	Shadow Flicker	Shadow Flicker Analysis	Refer to Chapter 15 Shadow Flicker
70	Shadow Flicker	Map of all receptors within 10 x rotor diameter of turbines with distance measurements	Refer to Chapter 15 Shadow Flicker Section 15.2
71	Shadow Flicker	Wind Turbine Control Measures	Refer to Chapter 15 Shadow Flicker Section 15.2.9 and 15.3
72	Air and Climate	Carbon Impact Assessment including Embodied Energy Assessment and Climate Change	Refer to Chapter 10 - Air Quality and Climate - Appendix 10.1 - Section 10.1.2
73	Air and Climate	Vulnerability Assessment	Refer to Chapter 10 - Air Quality and Climate - Section 10.3.4.4
74	Air and Climate	Dust Generation/Emissions and Management	Refer to Chapter 10 - Air Quality and Climate - Section 10.2.4
75	Air and Climate	Vehicle Emissions and Management	Refer to Chapter 10 - Air Quality and Climate - Section 10.2.4
76	Land, Soils & Geology	Ground Condition Assessment (inc): Ground Investigations Report Site Investigations Report On site precipitation monitoring and use of climate data Ground and surface water monitoring with control site Slope Stability Analysis (Justification of model employed).	Refer to Chapter 8 Soils and Geology
77	Land, Soils & Geology	Peat/Spoil Management Plan	Refer to CEMP Management Plan No.4 Spoil Management Plan
78	Hydrology, Hydrogeology & Water Quality	Hydrological Assessment	Refer to Chapter 9 – Hydrology and Hydrogeology
79	Hydrology, Hydrogeology & Water Quality	Hydrogeological Assessment	Refer to Chapter 9 – Hydrology and Hydrogeology
80	Hydrology, Hydrogeology & Water Quality	Flood Risk Assessment, high rainfall event planning	Refer to Chapter 9 – Hydrology and Hydrogeology - Appendix 9.1 Flood Risk Assessment
81	Hydrology, Hydrogeology & Water Quality	Surface water/Drainage Management Plan and methodologies	Refer to CEMP – Management Plan 3 – Surface Water Management Plan
82	Hydrology, Hydrogeology & Water Quality	Standalone Water Framework Directive Compliance Report	Refer to Chapter 9 – Hydrology and Hydrogeology - Appendix 9.3 Water Framework Directive Compliance Assessment Report
83	Hydrology, Hydrogeology & Water Quality	Emergency Response Plan	Refer to CEMP – Management Plan 1 – Emergancy Response Plan
84	Hydrology, Hydrogeology & Water Quality	Water Quality Management Plan	Refer to CEMP – Management Plan 2 – Water Quality Management Plan
85	Hydrology, Hydrogeology & Water Quality	Drinking Water Source (UE and GWSS) Assessment	Refer to Chapter 9 – Hydrology and Hydrogeology - Section 9.3.15
86	Landscape & Visual	Photomontages	Refer to Landscape and Visual Impact Amenity Viewpoint Photomontage Booklets No.1 to N0. 4
87	Landscape & Visual	ZTV Analysis (20km radius from development site)	Refer to Chapter 12 Landscape and Visual Section 12.3.7
88	Landscape & Visual	Landscape Character Assessment	Refer to Chapter 12 Landscape and Visual Section 12.4
89	Landscape & Visual	Viewpoint Assessment	Refer to Chapter 12 Landscape and Visual Section 12.4
90	Landscape & Visual	To include designated scenic roads and sensitive/vulnerable coastal landscapes within both Co. Mayo and Co. Sligo	Refer to Chapter 12 Landscape and Visual Section 12.3.5 and 12.3.6
91	Landscape & Visual	To include setting and integrity of the freestanding obelisk-topped Folly known locally as 'Lacken Gazebo'	Refer to Landscape and Visual Impact Amenity Viewpoint Photomontage Booklets N0. 4 View Point VP36 and VP36b and Chapter 14 Cultural Heritage Section 14.3.7,14.3.13, 14.3.14, 14.4.2, 14.4.4, 14.9 and 14.10
92	Traffic & Transportation	Turbine Delivery Route & Swept Path Analysis	Refer to Chapter 17 Traffic and Transport Appendix 17.1 Turbine Delivery Route Report
93	Traffic & Transportation	Haul Route & Swept Path Analysis	Refer to Drawing Schedule-Turbine Delivery Route- Auto Tracking Drawings
94	Traffic & Transportation	Traffic and Transport Assessment	Refer to Chapter 17 Traffic and Transport - provides a comprehensive Traffic and Transport Assessment of the Proposed Development on the local area
95	Traffic & Transportation	Traffic Management Plan (including Construction traffic)	Refer to Construction Environmental Management Plan (CEMP) No. 7 Traffic Management Plan
96	Traffic & Transportation	Stage 1 Road Safety Audit	Refer to Chapter 17 Traffic and Transport Section 17.2.5 Field work and Section 17.5 Assessment of Potential Effects
97	Traffic & Transportation	Design Report (TII requirements)	Refer to Chapter 17 Traffic and Transport Section 17.2.5 Field work and Section 17.5 Assessment of Potential Effects
98	Material Assets	Gas/ESB networks	Refer to Chapter 13 Material Assets and Other Issues Section 13.7 and 13.10
99	Material Assets	Telecommunications Impact Study	Refer to Chapter 13 Material Assets and Other Issues Section 13.6
100	Material Assets	Aviation Review Statement	Refer to Chapter 13 Material Assets and Other Issues Section 13.8 and Section 13.8.7
101	Material Assets	Any other relevant material assets identified in consultation process	Refer to Chapter 13 Material Assets and Other Issues
102	Cultural Heritage	Heritage Impact Assessment	See Chpt 14 Cultural Heritage
103	Cultural Heritage	Specific consideration of the architectural heritage of the freestanding obelisk-topped Folly known locally as 'Lacken Gazebo'	See chpt 14 sections 14.3.7, 14.3.13, 14.4.4, 14.9

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Item No.	Section	Information Required	Reference/Response
104	Cultural Heritage	Specific consideration of Palmerstown Bridge (Protected Structure) with detailed works methodology, structural and architectural heritage appraisal.	See chpt 14 sections 14.3.11, 14.3.13, 14.3.14, 14.4.1, 14.4.2, 14.4.5
105	Cultural Heritage	Archaeological Impact Assessment including appropriate level of field work (test trenches & geophysical survey recommended)	See Chpt 14 section 14.5.1 - Intention to carry out post-planning, in advance of construction
106	Major Accidents and Disasters	Construction Stage	Refer to Chapter 16 Major Accidents and Disasters Section 16.3 Proposed Development Hazard Analysis and CEMP Management Plans
107	Major Accidents and Disasters	Operational Stage	Refer to Chapter 16 Major Accidents and Disasters Section 16.3 Proposed Development Hazard Analysis and CEMP Management Plans
108	Major Accidents and Disasters	Impact of Climate Change	Refer to Chapter 10 Air and Climate
109	Major Accidents and Disasters	Fire Risk and Safety Assessment of the proposed Battery Energy Storage System (BESS), prepared by a competent expert in fire safety.	Refer to Chapter 16 Major AccidentsAppendix 16.1 Fire Safety Assessment
110	Major Accidents and Disasters	Emergency Response Plan for the proposed Battery Energy Storage System (BESS)	Refer to CEMP Management Plan No.1 Emerency Response Plan Section 3
111	Cumulative Assessment	Projects considered should be clearly identified and the location of the cumulative assessment clearly labelled within each Chapter as relevant.	Refer to Chapter 3 Alternatives Considered, Chapter 4 Planning Policy and Chapter 5 Population and Human Health and Chapter 13 Material Assets and Other Issues
112	Cumulative Assessment	Existing and permitted development in the vicinity of Killala Industrial Park as it relates to the proposed GCR and connection to Tawnaghmore 110kV substation to be considered.	Refer to Chapter 3 Alternatives Considered, Chapter 4 Planning Policy and Chapter 5 Population and Human Health and Chapter 13 Material Assets and Other Issues and Chpater 12 Landscape and Visual
113	Interactions	Description of interactions between factors.	Refer to Chapter 18 Interactions and Foregoing
114	Compendium of Mitigation Measures	Intent expressed for the implementation of mitigation measures to be clearly set out as - 'shall'.	This has been noted and changed through out all documents of the EIAR to "shall or Will" to express clear intent.
115	Compendium of Mitigation Measures	Commitments need to be expressed clearly and be specific.	This has been noted and changed through out all documents of the EIAR to "shall or Will" to express clear intent.
116	Appendices (EIAR)	All appendices and sub appendices to be submitted in hard and soft copy.	Two Hard Copies and 8 soft copies submitted, refer to Volume IV- Appendicies
117	Appendices (EIAR)	To include: Glossary of Terms, Noise Survey Results & Calibration Certificates, Material Volume Calculations, Statement of Competency	Refer to Volume IV- Appendicies
118	AA Screening Report	Author qualifications, experience and expertise	Refer to AA Screening Report, section 1.3 Statement of Authority and Project Team for details of author's experience and expertise
119	AA Screening Report	Methodology	Refer to AA Screening Report, section 2.3 Method and Identification of Relevant European Sites
120	AA Screening Report	Zone of Influence (ZOI) and identification of relevant European Sites to be based on a Source-Pathway-Receptor Model using the precautionary principle	Refer to AA Screening Report, section 2.3 Method and Identification of Relevant European Sites
121	AA Screening Report	Must include consideration of: Killala Bay/Moy Estuary Special Protection Area (SPA) (Site Code: 004036), Lackan Saltmarsh and Kilcummin Head Special Area of Conservation (SAC) (Site Code: 000516) and Killala Bay/Moy Estuary Special Area of Conservation (SAC) (Site Code: 000458)	Refer to AA Screening Report, Table 2 and Figure 5, and section 2.4 Assessment of Potential for Imapcts and Significant Effects.
122	NIS	Author qualifications, experience and expertise	Refer to AA Screening Report / NIS, section 1.3 Statement of Authority and Project Team for details of author's experience and expertise
123	NIS	Methodology	Refer to AA Screening Report / NIS, section 2.3 Method and Identification of Relevant European Sites
124	NIS	Up to date Collision Risk Modelling (CRM) NatureScot 2024	Refer to AA Screening Report / NIS, section 1.4 Data Sources to Carry Out Assessment,
125	NIS	Biodiversity & Ornithology Surveys for QI & SCI species and habitats in accordance with Best Practice	Refer to AA Screening Report / NIS, section 1.4 Data Sources to Carry Out Assessment,
126	NIS	Consideration of relevant Land, soils & geology reports/assessments*	Refer to AA Screening Report / NIS, section 1.4 Data Sources to Carry Out Assessment
127	NIS	Consideration of relevant Hydrological, hydrogeological & water reports/assessments*	Refer to AA Screening Report / NIS, section 1.4 Data Sources to Carry Out Assessment
128	NIS	Compendium of Mitigation Measures (Intent expressed for implementation of mitigation measures 'shall')	Refer to AA Screening Report / NIS, section 3.4 Mitigation Measures during Construction Phase, section 3.5 Mitigation Measrues during Operation Phase, and section 3.6 Mitigation Measures during Decommissioning Phase
129	Civil Engineering Report	Site Entrances, Access Tracks, Wind turbines, Cable routes & connections	Refer to Chapter 2 Project Description - Section 2.6.5 Site Entrances and Access Tracks, Section 2.6.2 Wind turbines and 2.6.12 Cable routes & connections
130	Civil Engineering Report	Substation (Compound & Buildings)	Refer to Chapter 2 Project Description - Section 2.6.9 Substation and Control Building
131	Civil Engineering Report	BESS	Refer to Chapter 2 Project Description - Section 2.6.10 BESS
132	Civil Engineering Report	Meteorological Mast	Refer to Chapter 2 Project Description - Section 2.3
133	Civil Engineering Report	Temporary construction compounds	Refer to Chapter 2 Project Description - Section 2.7.7
134	Civil Engineering Report	Deposition Areas	Refer to Chapter Project Description 2.3 and Figure 2.5 Site Layout Map
135	Civil Engineering Report	Haul Route	Refer to Chapter 2 Project Description and Figure 2.5 Site Layout Map
136	Civil Engineering Report	Turbine Delivery Route	Refer to Chapter 17 Traffic and Transport Appendix 17.1 Tirawley Turbine Delivery Report
137	Civil Engineering Report	Surface Water Design	Refer to Construction Environmental Management Plan (CEMP) Plan No. 3 Surface Water Management
138	Civil Engineering Report	Wastewater	Refer to Construction Environmental Management Plan (CEMP) No. 5 Waste Water Management
139	Civil Engineering Report	Potable Water	Refer to Chapter 9 Hydrology and Hydrogeology
140	Civil Engineering Report	Decommissioning & Restoration	Refer to Construction Environmental Management Plan (CEMP) No. 6 Decommissioning Plan