

ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR) FOR THE PROPOSED COOM GREEN ENERGY PARK GRID CONNECTION

VOLUME 2 – MAIN EIAR

CHAPTER 4 - PLANNING POLICY

Prepared for:

Coom Green Energy Park Ltd.



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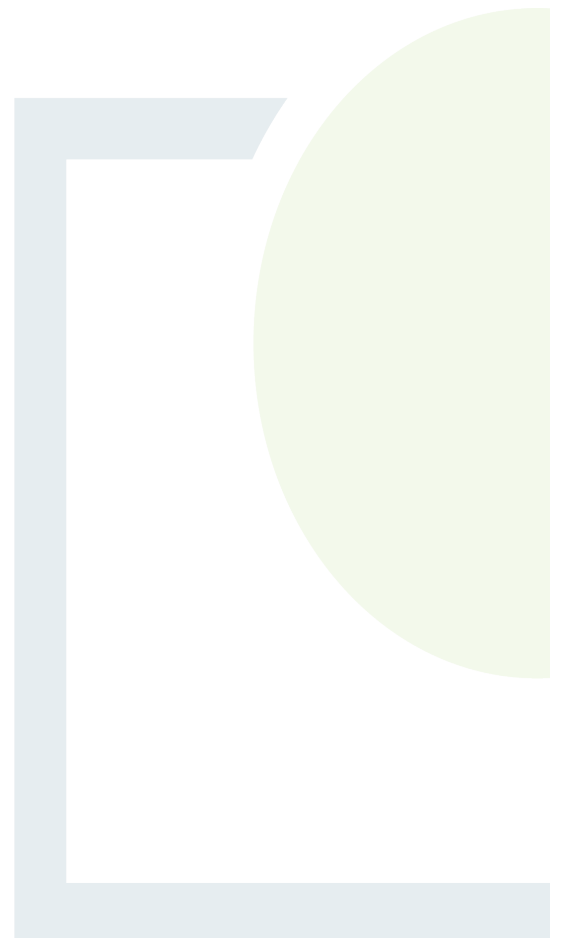


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4. PLANNING POLICY CONTEXT

4.1 Introduction

This Chapter (Chapter 4) of the Environmental Impact Assessment Report (EIAR) outlines current International, National, Regional, and Local policy (where relevant) in combination with legislation relating to the Proposed Development of a 110kV grid connection route (GCR), 33kV collector network route (CNR), and 110kV Substation associated with the consented Coom Green Energy Park (permitted under ACP Application Ref. 308885-20) located in the jurisdiction of County Cork and within the administrative boundary of Cork County Council. The Proposed Development refers to all elements of the project to be assessed in the EIAR, the details of which are set out within Chapter 2: Development Description.

The Irish Planning Policy system is set within a hierarchical structure, as identified in Plate 4-1, below. EU Directives, Planning Legislation, Ministerial Guidelines, Government Policy and Capital programmes inform national policy.

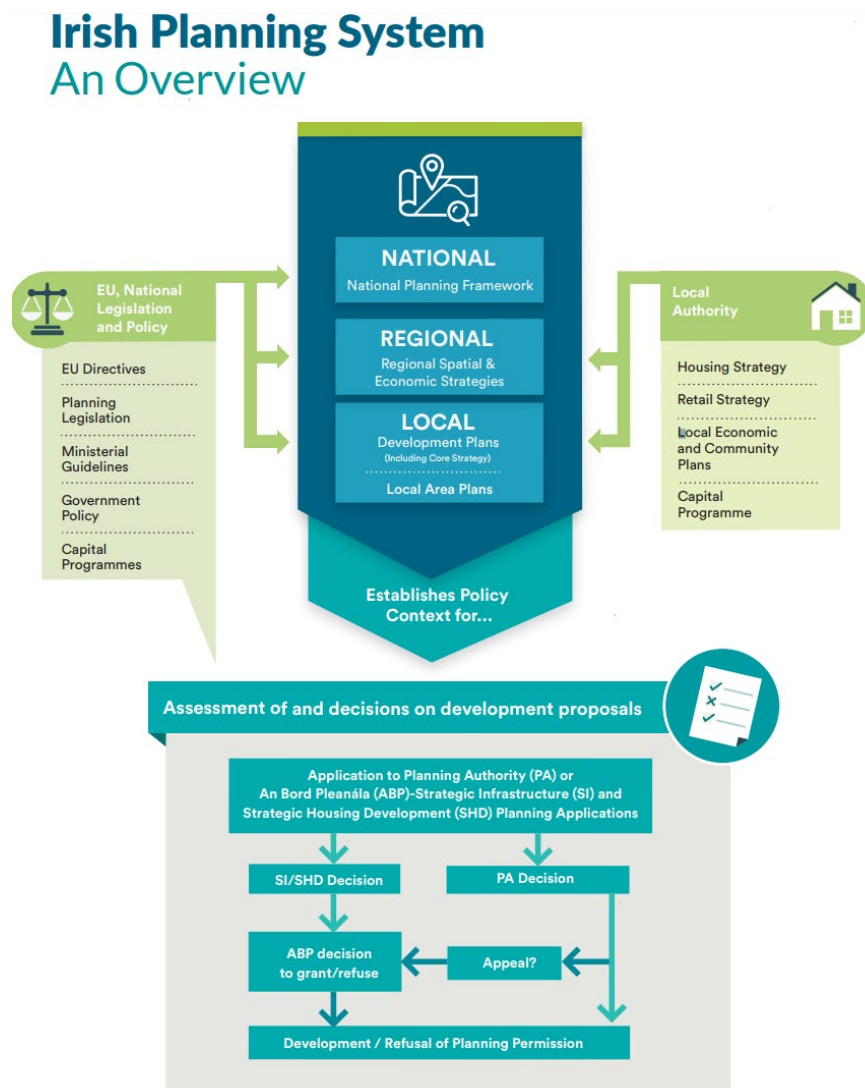


Plate 4-1: Irish Planning System - An Overview (Extract from the National Planning Framework - Ireland 2040)



International and European legally binding agreements, to reduce the reliance on fossil fuels and to manage climate change internationally, have been adopted into Ireland's National Energy Policy. This section of the EIAR outlines how these agreements are being facilitated through National Energy and Climate Policy, with a clear mandate to support onshore wind energy development within the state.

The latest SEAI figures indicate that Ireland has not met its targets up until 2020 under the First Renewable Energy Directive (RED1), and is not on track to meet its targets under the second Renewable Energy Directive (RED2 as amended by REDIII) (SEAI, 2022)¹. Furthermore, the recent increase in renewable electricity targets to 80% by 2030 under the Climate Action Plan 2024, retained in the Climate Action Plan 2025 indicates the need for significant escalation in renewable energy production in Ireland. The following Chapter sets out how the proposed development complies with national and local energy policy, and will contribute towards Ireland's national renewable energy targets.

4.1.1 EIAR Policy Chapter Authors

This chapter has been prepared by Ida Wulff, with the assistance of Evan Rossiter, and reviewed and approved by Jim Hughes, all of Fehily Timoney and Company.

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This chapter has been reviewed and approved by Jim Hughes. Jim holds a BA in Public Administration from the University of Limerick, an MSc in Town Planning from Queen's University Belfast and a Higher Diploma (H.Dip) in Environmental Impact Assessment from University College Dublin and has over 20 years of experience. Jim has led major Irish projects in the planning, environmental assessment and permitting disciplines including many wind farm developments.

4.2 International Global Policies

4.2.1 United Nations Framework Convention on Climate Change

The United Nations Framework Convention on Climate Change (UNFCCC) is an international environmental treaty negotiated at the United Nations Conference on Environment and Development (UNCED), in Rio de Janeiro in 1992. Its ultimate aim was to achieve "*...stabilisation of greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system*" (United Nations, 2013)². There are 195 parties ratified to the Convention, and these are subdivided into Annex I, Annex II, Annex B, Non-Annex I and Least Developed Countries.

¹ <https://www.seai.ie/publications/Energy-in-Ireland-2022.pdf>

² [What is the United Nations Framework Convention on Climate Change? | UNFCCC](#)



The Framework Convention specified the aim of developed (Annex I) parties, which includes Ireland, to stabilise their greenhouse gas emissions (carbon dioxide and other anthropogenic greenhouse gases not regulated under the Montreal Protocol) at 1990 levels, by the year 2000. The treaty did not set any limits or binding targets, instead, it provided a framework for negotiating specific international treaties ("protocols") that set binding limits on greenhouse gases. It does, however, require all parties in Annex 1 to prepare and publish National Inventory Reports (NIRs) on emissions [Decision 3/CP.5]. The Environmental Protection Agency (EPA) is responsible for the preparation of Ireland's NIR.

The Conference of the Parties (COP) is the highest body of the UNFCCC and consists of environment ministers who have met annually since 1995 to assess progress in dealing with the issue of climate change. At the Conference of the Parties of 2024, COP 29, which was held in Baku, Azerbaijan from the 11th to the 24th of November 2024, an agreement was reached for developed nations to pay up to \$300 billion per year by 2035 to support climate efforts in development countries. COP 29 also finalised rules for an international carbon market under the Paris Agreement but failed to agree on how to implement last year's pledge to transition away from fossil fuels, which was deferred to COP 30 in Brazil. COP 30, held between the 10th to the 21st of November 2025, saw the adoption of a series of measures to accelerate implementation and international cooperation. These include the launch of a Global Implementation Accelerator, the tripling of adaptation finance, a Just Transition Mechanism, and the recognition of the importance of the role of cities, states, and municipalities in climate action. COP 30 concluded with clear manifestations of renewed political commitment and the strengthening of climate multilateralism.

The *International Panel on Climate Change* (IPCC) has put forward its clear assessment that the window for action on climate change is rapidly closing, and that renewable energy sources such as wind will have to grow from 30% of global electricity at present, to 80% by 2050 if we are to limit global warming to well below 2°C above pre-industrial levels in accordance with previous COP agreements. COP 28 gave a renewed emphasis on climate action and the increasing viability and role of renewables such as wind energy to provide a more sustainable future. This was emphasised by a key outcome of COP28 which was the "*Global Renewables and Energy Efficiency Pledge*". Otherwise referred to as the '*COP28 Global Renewables and Energy Efficiency Pledge*', this pledge aims to triple global renewable energy capacity by 2030, reaching at least 11,000 GW, with wind energy expected to be a major contributor to achieving this target.

The wind energy sector, represented by organizations like the *Global Wind Energy Council* (GWEC), actively participated in COP28, where they highlighted the advantages of wind power as a viable and sustainable means of reducing reliance on fossil fuels, boosting energy security, and creating jobs. Former Environment Minister Alan Kelly remarked as far back as 2015 that, "*As a nation we must do everything in our power to curb our emissions*".

The *Climate Action and Low Carbon Development Act 2015* as amended by the *Climate Action and Low Carbon Development (Amendment) Act 2021* (the "Climate Act"), provides for the approval of plans by the Government in relation to climate change for the purpose of pursuing the transition to a low carbon, climate resilient and environmentally sustainable economy.

4.2.2 Kyoto Protocol

In 1997, the Kyoto Protocol set legally binding obligations for developed countries to reduce their Greenhouse Gas (GHG) emissions and two commitment periods were established. The Kyoto Protocol is an international treaty which extends the 1992 United Nations Framework Convention. The Kyoto Protocol came into effect in 2005, as a result of which, emissions reduction targets agreed by development countries, including Ireland are now binding.



The first commitment period (2008 - 2012) applied to emissions of six main greenhouse gases (carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulphur hexafluoride (SF₆)), and set targets for:

- A 5% overall reduction in the emission of greenhouse gases in developed countries.
- An average 8% reduction below 1990 levels within the EU.

The 15 member states of the European Union at that time (the EU 15) and other European countries (some of which subsequently acceded to the EU) have individual GHG reduction and limitation targets under the Kyoto Protocol.

Ireland's contribution was a limit of 13% above 1990 greenhouse gas emission levels which corresponds to an average limit of 62.8 million tonnes (Mt) of carbon dioxide equivalent (CO₂eq) per annum during the period 2008 – 2012. Countries not fulfilling their obligations were forced to purchase carbon credits on an open market from compliant countries.

4.3 European Union Directives - Legislation and Policy

This section summarises the previous policies and targets for renewable energy and greenhouse gas (GHG) emissions in Europe up to 2020 in order to provide context and establish the progress made in Ireland over the past two decades to achieve these EU targets. The section then details the latest policies and targets with a view to 2030 and beyond, which the subject application hopes to contribute to through the facilitation of the approved wind farm. The various directives and policies of the EU set a clear mandate for each member state to transition to sustainable, renewable energy and reduce greenhouse gas emissions. This is reflected in the theme of European Commission President, Ursula von der Leyen's inaugural 'State of the Union' address delivered on 16 September 2020 which emphasised the need to transform the European economy and society to deal with the climate change emergency. It was also stated that the EU aims to reduce the EU's net greenhouse gas emission by at least 55% on 1990 levels by the end of this decade.

4.3.1 EU Emission Trading System (ETS)

One of the key mechanisms introduced under the Kyoto Protocol is the international emissions trading scheme which allows developed countries to trade their commitments. They can trade emissions quotas among themselves and can also receive credit for financing emissions reductions in developing countries.

The EU Emission Trading System (ETS) came into operation on 1 January 2005 and was introduced to allow Member States achieve their commitments to limit or reduce greenhouse gas emissions in a cost-effective way. It is the largest such scheme in the world and allows participants to buy or sell emission allowances which means that emission cuts can be achieved at least at cost. The EU ETS is now in its fourth trading phase (2021-2030).

The EU ETS is a 'cap and trade' scheme, in that it caps the overall level of emissions allowed but, within that limit, allows participants in the scheme to buy and sell allowances as they require. These allowances are the common trading 'currency' at the heart of the scheme. One allowance gives the holder the right to emit one tonne of CO₂ or the equivalent amount of another greenhouse gas (CO₂eq).

The categories of activity covered by the EU ETS are set out in Annex 1 of the principal Directive, as amended (2003/87/EC) (the "ETS Directive") and the greenhouse gases to which the Scheme applies to are set out in Annex II of the same Directive.



The Scheme operates in periodic cycles that have come to be known as ‘phases’ as the EU ETS scheme is open ended with no termination date specified. Phase 1 ran from 2005 - 2007 and was known as the commitment period, Phase 2 covered 2008 - 2012 (the Kyoto Phase) and Phase 3 ran from 2013 - 2020, with this phase completing at the same date as the EU Commissions end date of 31 December 2020 for its own reduction in greenhouse gases.

Phase 4 runs from 2021-2030 and aims to achieve the EU's 2030 emission reduction targets in line with the 2030 climate and energy policy framework and as part of the EU's contribution to the 2015 Paris Agreement (EU, 2019)³. Following revisions to the ETS Directive in 2023, the trading system is set to bring emissions down by 62% by 2030, compared with 2005 levels.

4.3.2 European Union Targets for 2020 and the Irish Context

The year 2020 was a significant milestone for renewable energy and emissions targets in Europe. The EU Directive on the Promotion of the Use of Energy from Renewable Sources (2009/28/EC) set a target of 20% of EU energy consumption from renewable sources by 2020 and a 20% cut in greenhouse gas emissions by 2020, the so-called 20:20:20 plan.

As part of this Directive, Ireland’s overall national target for the share of energy from renewable sources in gross final consumption of energy in 2020 was 16% (increased from 3.1% in 2005). For renewable electricity alone, Ireland set a national target of 40% by 2020 as outlined in the National Renewable Energy Action Plan (NREAP). The sectoral components of the overall 16% target are detailed in Table 4-1, which outlines each form of renewable energy supply (RES). The share of renewable energy for each component in the two years leading up to 2020 is also presented.

Table 4-1 demonstrates that Ireland made significant progress in achieving its 2020 renewable electricity targets. Wind energy accounted for 32% of all electricity generated in 2019, the largest contributor of renewable electricity in Ireland.

Table 4-1: Target and Current Share of Renewable Energy in Energy Sectors

Form of Renewable Energy Supply	2018 Position (SEAI, 2020)	2019 Position (SEAI, 2020a)	Target Share For 2020
Electricity (RES-E)	33.2%	36.5%	40%
Heat (RES-H)	6.5%	6.3%	12%
Transport (RES-T)	7.2%	8.9%	10%

Source: SEAI (2020), Renewable Energy in Ireland 2020 Update & SEAI (2020a), Energy in Ireland 2020 Report

³ [Auctioning Regulation amendment for phase 4 of the EU ETS published and to enter into force \(europa.eu\)](https://eur-lex.europa.eu/eli/reg/2023/1115/oj)



In 2008, the EU agreed a climate and energy package that included a target to reduce GHG emissions across the EU by 20% below 1990 levels by the year 2020. This resulted in two pieces of European legislation focusing on reduction in GHG emissions. Directive 2009/29/EC requiring ETS companies to reduce their emissions by 21% below 2005 levels by 2020; and Decision 406/2009/EC which set out the minimum contribution of Member States for meeting greenhouse gas reductions which required Ireland to reduce non-ETS emissions by 20% below 2005 levels by 2020.

According to the EPA (2022)⁴, Ireland achieved approximately 13.6% reduction in GHG emissions compared to 2005 levels (the baseline). This included an approximate 35.4% reduction in GHG emissions in the energy sector, indicating renewable energy's significant contribution to the overall reduction in greenhouse gas emissions in Ireland.

Table 4-1 above, clearly outlines the progress made towards the 2020 targets, while making it abundantly clear renewable energy sources have contributed greatly to the achievement of Ireland's energy and emissions targets as set by the EU. This places Ireland in a strong position to continue this progress towards 2030 EU targets, as detailed in the following sections.

4.3.3 2030 Climate and Energy Framework

In October 2014 EU leaders adopted the 2030 Climate and Energy Framework (European Commission, 2014) which was subsequently updated in 2018. The framework provides a long-term perspective beyond 2020 targets. The 2030 Climate and Energy Framework sets out three key targets for the year 2030:

- At least 40% cuts in greenhouse gas emissions (from 1990 levels)
- At least 32% share of renewable energy
- At least 32.5% improvement in energy efficiency.

Further to this the European Commission in 2016 published its 2030 emissions targets break down for each Member State. While the overall EU target is a reduction of 40% on 1990 greenhouse gas emissions by 2030, every Member State negotiates an individual target. Ireland will have to reduce its emissions by 30% relative to its 2005 emissions.

Ireland will have 4% one-off flexibility from emissions trading, at the highest end of the ranking. Ireland will have 5.6% flexibility from land use. This is a substantially larger margin than any other Member States except Latvia.

⁴www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA-Ireland's-Provisional-GHG-Emissions-1990-2021_July-2022v3.pdf



4.3.4 A Roadmap for Moving to a Competitive Low Carbon Economy in 2050

Looking beyond 2020 in compliance with the EC Energy Roadmap 2050, an EU target of at least 75% has been indicated as the share of renewable energy consumed in the EU in 2050. While the Department of Communications, Climate Action and Environment (DCCAE) is currently examining the potential for diversifying Ireland’s renewable technology mix in the post-2020 period, the Department recognises that; “as a proven and cost effective technology, onshore wind will remain part of Ireland’s generation portfolio out to 2030 and will help to meet Ireland’s contribution to the binding EU-wide 2030 renewable energy target”⁵. The Roadmap has informed national policy and has influenced the Climate Action Plan (2024 and 2025) which sets out actions to reduce climate change towards 2050.

4.3.5 Renewable Energy Directive (RED II & RED III)

The EU Directive (2018/2001/EU), known as the Renewable Energy Directive II (RED II), entered into force on 11 December 2018 with one of its aims being to provide guiding principles on financial support schemes for RED, renewable energy self-consumption, energy communities and district heating. As part of RED II, Ireland’s overall national target for the share of renewable energy sources (RED-E), forms the backbone of Ireland’s strategy to achieve the overall renewable energy target for 2030.

Following on from RED II, the EU adopted ‘Directive (EU) 2023/2413’, known as Renewable Energy Directive III (RED III) on 20th November 2023, aiming to further increase its renewable energy ambitions. RED III amends RED II, and is in line with the ‘European Green Deal (2019), described in 4.3.6 below. RED III sets a new binding target of c. 42.5% renewable energy in the EU’s total energy consumption by 2030, with an aspirational target of 45% being introduced. RED III introduces sector-specific targets for transport, heating, cooling and industry, to ensure a balanced contribution from all parts of the economy, and also includes measures to streamline and accelerate the permitting process for renewable energy projects, addressing one of the key bottlenecks in the deployment of renewables.

Under RED III, Member States must ensure that in the permit-granting procedure, the planning, construction and operation of renewable energy plants, **the connection of such plants to the grid, the related grid itself, and storage assets** are presumed to be in the overriding public interest. The faster consenting timelines for renewable energy projects required under RED III have been transposed into Irish law by the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. 274/2025). RED III reflects the EU’s commitment to achieving higher renewable energy targets, and facilitating clean energy.

As per the Circular Letter (CEPP 1/2025) of 15th August 2025, new measures aimed at fast tracking the permitting procedures for renewable energy projects have been adopted into Irish Law pursuant to the RED III Directive through the European Union (Planning and Development) (Renewable Energy) Regulations 2025. Clean Energy for all Europeans Package (2019)

⁵https://unece.org/fileadmin/DAM/env/pp/compliance/C2014-112_Ireland/frComm_03.09.2017/frCommC122_03.09.2017_update_att_1_Information_Note_on_Review_of_the_Wind_Energy_Development_Guidelines.pdf



In 2016, based on published Commission proposals, the EU decided to tackle the transition towards clean energy and a carbon-neutral economy by rewriting the EU's energy policy framework to facilitate a clean and fair energy transition. This delivered the Clean Energy for all Europeans Package in 2019, providing a modern, stable legal environment and setting a clear and common sense of direction, the EU aims to stimulate the necessary public and private investment and bring European added value by addressing these challenges. As a package the new rules will reinforce consumer rights, putting them at the heart of the energy transition and creating growth and green jobs in a modern economy. They will enable the EU to show leadership in the fight against climate change following the Paris Agreement.

The Clean energy for all Europeans Package strikes an appropriate balance between making decision at EU, national and local level. Member states will continue to choose their own energy mix but must meet new commitments to improve energy efficiency and take-up of renewables in that mix by 2030. For instance, the new rules on the electricity market, which have been adopted, will make it easier for renewable energy to be integrated into the grid, encourage more inter-connections and cross-border trade, and ensure that the market provides reliable signals for future investment. Member states are required to draft plans to prevent, prepare for and manage potential crisis situations in the supply of electricity in coordination with neighbouring Member States, and to enhance the role of the Agency for the Cooperation of Energy Regulators.

4.3.6 European Green Deal (December 2019)

The European Green Deal, published on 11th December 2019, is a growth strategy for the EU which aims to transform the EU into a fair and prosperous society, improving quality of life with a modern, resource-efficient, and competitive economy where there are no net emissions of greenhouse gases in 2050 and where economic growth is decoupled from resource use. The EU aim to do this by becoming climate-neutral by 2050.

With regard to the supply of clean, affordable and secure energy, the European Green Deal underlines the fact that in order to meet the EU's climate and sustainability goals, all sectors must increase their use of renewable energy and phase out fossil fuels.

According to the 2030 Climate Target Plan⁶, the EU aim to achieve a greenhouse gas emission reduction of at least 55% by the year 2030, compared to 1990 levels; in order to achieve net-zero greenhouse gas emissions by 2050. A key principle for achieving this will be to develop a power sector based largely on renewable resources.

The EU Climate Law⁷ obliges all EU institutions across all areas of competence, and the Member States, to work collectively to achieve the greenhouse gas emission reduction target of 55%.

4.3.7 European Climate Law (July 2021)

The European Climate Law, which entered into force on 29th July 2021, writes into law the goal set out in the European Green Deal for Europe's economy and society to become climate-neutral by 2050. The law also sets the intermediate target of reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels. However, on 6th February 2024, the European Commission presented its updated assessment for a 2040 climate target for the EU.

⁶ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0562>

⁷ https://climate.ec.europa.eu/eu-action/european-green-deal/european-climate-law_en



In July 2025, the European Commission proposed an amendment to the European Climate Law which would set an EU climate target of a 90% reduction in net greenhouse gas emissions by 2040, in comparison to 1990 levels. The proposed 2040 climate target will reaffirm the EU's determination to tackle climate change, and will shape the EU's path after 2030, to ensure the EU reaches climate neutrality by 2050. The climate neutrality objective is at the heart of the European Green Deal.

Climate neutrality by 2050 means achieving net zero greenhouse gas emissions for EU countries as a whole, mainly through cutting emissions, investing in green technologies and protecting the natural environment. The law aims to ensure that all EU policies contribute to this goal and that all sectors of the economy and society play their part. The main objectives of the climate law include:

- Implementation of Existing Laws: Fully implement existing EU laws to reduce emissions by at least 55% by 2030 compared to 1990 levels;
- Decarbonisation of Industry: Focus on decarbonising industry by leveraging strengths in wind power, hydropower, and electrolysers, and investing in technologies for carbon capture, storage, and reuse;
- Boosting Domestic Manufacturing: Increase domestic manufacturing in growth sectors such as batteries, electric vehicles, heat pumps, and solar cells;
- Fairness and Solidarity: Ensure fairness and solidarity by supporting vulnerable citizens, regions, businesses, and workers through tools like the Social Climate Fund and Just Transition Fund;
- Open Dialogue: Maintain an open dialogue with all stakeholders, including farmers, businesses, social partners, and citizens.

4.3.8 RePower EU Plan

The RePower EU Plan was published on 18th May 2022 and is a plan which sets out a response to the hardships and global energy market disruption caused by Russia's invasion of Ukraine and the need for the role of renewable energy to slow down climate change and to phase out Russian fossil fuels by 2027. To address these, the RePower EU Plan contains measures to:

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

The RePower EU Plan states:

“Wind energy, in particular offshore wind represents a significant future opportunity: resources are stable, abundant and public acceptance is higher. Europe is the global leader in offshore wind. To further strengthen the EU wind sector's global competitiveness and achieve the REPowerEU ambition with fast wind energy deployment, supply chains need to be strengthened and permitting drastically accelerated.”

Specific objectives of the REPower EU Plan are that Member States should speed up the green transition and spur massive investment in renewable energy. Ireland will need to enable industry and transport to substitute fossil fuels faster to bring down emissions and dependencies.



4.3.9 Commission Recommendation and Guidance to Member States (EU) 2024/1343 of 13 May 2024 on speeding up permit granting procedure for renewable energy and related infrastructure projects

The Commission Recommendation and Guidance to Member States (EU) 2024/1343 of 13 May 2024 is a document which intends to speed up the permit granting procedure for renewable energy and related infrastructure projects in the European Union. The document provides a number of recommendations and guidance on how to streamline the permitting process, which include some of the following:

- Streamlining procedures: The document recommends that Member States simplify and harmonize their permitting procedures, including by reducing the number of permits required and by streamlining the environmental impact assessment process.
- Digitalization: The document encourages Member States to use digital tools to improve the efficiency of the permitting process, such as by providing online portals for submitting applications and tracking the progress of permits.
- Stakeholder engagement: The document emphasizes the importance of early and effective stakeholder engagement in the permitting process. This includes involving local communities, businesses, and other interested parties in the planning and decision-making process.
- Human resources and skills: The document recommends that Member States invest in the training and development of staff who are responsible for processing permit applications.

The document also provides guidance on how to designate "renewables acceleration areas," which are areas where the deployment of renewable energy projects is not expected to have significant environmental impacts, where the permitting process can be further streamlined, which is likely to have a positive impact on the deployment of renewable energy and related infrastructure in the EU.

4.3.10 EU Action Plan for Grids

The EU Action Plan for Grids was published in November 2023, highlighting the need to speed up electricity grid provision to achieve wider climate action targets across the EU. The Plan outlines the target of a further half a trillion Euro in investments in electricity grids across Europe by 2030, with a substantial part of the being needed in distribution grids. This is to improve the long-term planning of grids to accommodate more renewables in the energy system.

The European grid Action Plan identifies a number of interlinked measures that can be completed to substantially increase grid hosting capacities for new renewables and flexibility sources for the system. These include high-quality network planning together with streamlined permitting procedures for grid projects.

4.3.11 European Union Policy Conclusion

The Proposed Development is considered to be in line with European Union Policies and legislation as outlined above. The Proposed Development will enable the delivery of approved Coom Green Energy Park Wind Farm's generated electricity to the national grid, thereby assisting in the national strive to achieve our climate action goals, in line with the RePower Europe Plan as well as the European Green Deal.

The Proposed Development further falls in line with the EU Action Plan for Grids by improving the grid infrastructure both to facilitate the approved Coom Green Energy Park, but also to benefit future development in the region as the infrastructure will remain in situ after the Wind Farms decommissioning.



4.4 National Policies and Legislation

National energy and climate policy are informed by the overarching European Policy which aims to unify the European Union's energy and climate goals. The following section sets out the relevant national policies which will influence the development of the country in the coming decades with respect to energy production, carbon neutrality and climate change mitigation.

These policies are supported by the latest Programme for Government (2025) titled 'Securing Ireland's Future' which presents strong climate governance in rapidly addressing climate change to protect and improve public health and quality of life, and has identified wind energy as having a crucial role to play in achieving this. The government are committed to rapid decarbonisation of the energy sector with an aim of providing the necessary actions to deliver national renewable electricity targets. These government ambitions support the ongoing generation of renewable energy from onshore wind sources. The Climate Action Plan 2024 and Climate Action Plan 2025, which must be read together, state the following commitments:

- To achieve 80% renewable electricity by 2030;
- Deliver 9 GW of onshore wind by 2030;
- Hold at least one Renewable Energy Support Scheme (RESS) auction per year;
- Prioritizing and increase investment in the electricity grid;
- Develop a policy to address repowering and extend the life of existing onshore wind farms.

4.4.1 The White Paper: Ireland's Transition to a Low Carbon Energy Future 2015 - 2030

This Government strategy calls for a radical transformation of Ireland's energy system to meet committed targets and achieve a low carbon energy system by 2050. These commitments included a then EU target to source 20 per cent of its energy needs from renewables such as wind, solar and biomass. Within this, Ireland committed to generating 16% of its overall energy requirements from renewables by 2020 under the EU's plan, with 8% coming from renewables at the time of the document's publication.

The strategy includes an objective to "accelerate the development and diversification of renewable energy generation" and increase the country's output of electricity from renewable sources of which we have a plentiful indigenous supply. It is stated that this will be achieved through a number of means including wind, solar PV and ocean energy. The paper recognises that growth in renewable energy has been led by onshore wind which will continue to be a mainstay in renewable energy generation which is:

"a proven technology and Ireland's abundant wind resource means that a wind generator in Ireland generates more electricity than similar installations in other countries."

4.4.2 Climate Action and Low Carbon Development Act 2015, as amended by the Climate Action and Low Carbon Development (Amendment) Act 2021

The Climate Action and Low Carbon Development Act was signed into law in December 2015 and subsequently amended by the Climate Action and Low Carbon Development (Amendment) Act 2021 (the "Climate Act").



The Climate Act

The Climate Act sets out the national objective of transitioning to a low carbon, climate resilient and environmentally sustainable economy in the period up to, and including, the year 2050. The act provides for a solid statutory foundation to the institutional arrangements necessary to enable the State to pursue and achieve the “national transition objective”.

The Climate Act provides for the approval of plans by the Government in relation to climate change for the purpose of pursuing the transition to a climate resilient, biodiversity rich and carbon neutral economy by the end of the year 2050. It establishes a legally binding framework with clear targets and commitments set in law, and embeds the necessary structures and processes on a statutory basis to ensure we achieve our national, EU and international climate goals and obligations in the near and long term. The Act significantly strengthens the framework for governance of climate action by the State in order to realise our national, EU and international climate goals and obligations.

When exercising its decision-making powers under the Planning Act, planning authorities and the Commission 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 Act embeds the process of carbon budgeting into law, with the Government required to adopt a series of economy-wide five-yearly carbon budgets to include sectoral targets for each relevant sector on a rolling 15-year basis. These five-yearly carbon budgets commenced in 2021, with the five-yearly carbon budgets equating to a total reduction of 51% emissions over the period to 2030. This reduction in emissions is in line with the programme for Government which commits to a 7% average yearly reduction in overall greenhouse gas emissions over the next decade to achieve net zero emissions by 2050. This Act will drive implementation of a suite of policies to help us achieve this goal.

The Act also requires for all Local Authorities to prepare individual Climate Action Plans which will include both mitigation and adaptation measures, representing a mandate for Local Authorities to adapt to climate change.

4.4.3 Ireland's Integrated National Energy and Climate Plan 2021 - 2030 (NECP)

Ireland's Integrated National Energy and Climate Plan 2021-2030 (NECP's), published July 2024, is the framework within which Ireland must plan their climate and energy objectives, targets, policies, and measures to the European Commission.

The Governance Regulation (Regulation (EU) 2018/1999 of the European Parliament and of the Council on the Governance of the Energy Union and Climate Action), within which the NECP framework sits, consolidates the patchwork of planning, monitoring, and reporting obligations Member States had under the different pieces of EU legislation across energy, climate, and other Energy Union related policy areas. Member States were required to develop NECP's on a ten-year rolling basis, with an update halfway through which covers the five dimensions of the Energy Union, with the Ireland's National Energy and Climate Plan 2021 - 2030 being updated in 2024.



In accordance with the Governance of the Energy Union and Climate Action Regulation, the updated Integrated National Energy & Climate Plan (NECP) 2021-2030 was submitted to the European Commission in December 2023. This document outlines Ireland's energy and climate policies for the period from 2021 to 2030 and looks onwards to 2050, and incorporate comments from the Commission, public consultation and updated policies and targets.

The NECP (published July 2024) establishes key measures to address the five dimensions of the EU Energy Union, which include:

- Decarbonisation: GHG emissions and removals and Renewable Energy;
- Energy efficiency;
- Energy security;
- Internal energy market;
- Research, innovation and competitiveness.

It is important to note that Article 4 of the Governance Regulation (Regulation (EU) 2018/1999 of the European Parliament and of the Council on the Governance of the Energy Union and Climate Action), sets out specific trajectory requirements for renewable energy share in key intermediate years of 2022, 2025, and 2027. Ireland's initial NECP (published in 2019) set out specific annual targets for delivery of onshore and offshore wind in order to meet the requirements of Article 4. These intermediate targets will be particularly difficult to deliver and will require early deployment of onshore wind in particular, as the legislative framework underpinning offshore wind is in its infancy.

Within the NECP, relevant renewable energy objectives include:

- Achieve a 43% share of renewable energy in energy consumption by 2030;
- Increase electricity generated from renewable sources to 80% by 2030, underpinned by the Renewable Electricity Support Scheme (RESS);
- Streamline consenting and connection arrangements;
- Facilitate community participation in renewable generation;
- Provide funding supports for new technologies onshore and offshore; and
- Support the ocean energy research, development and demonstration pathway for emerging marine technologies and associated test infrastructure.

4.4.4 [Project Ireland 2040: National Development Plan 2021 - 2030 \(NDP\) and the National Planning Framework \(NPF\)](#)

The National Planning Framework (NPF) and the National Development Plan 2021-2030 (NDP) combine to form 'Project Ireland 2040'. The NPF sets the vision and strategy for the development of our country to 2040, and the NDP provides the enabling investment to implement that strategy. We note that the recent partial commencements of Parts 3 and 6 of the Planning and Development Act 2024, which pertains to the Planning Policy Structure, will fundamentally affect the structure of National, Regional and Local Planning Policy. However, at the time of writing this EIAR there were no plans formally published or enacted.



The National Development Plan 2021-2030 (NDP), originally published in October 2021 with a revised NDP published on 22nd July 2025, sets out the Government’s over-arching investment strategy and budget for the period 2021-2030. The NDP thereby provides a platform from which investment can be provided and strategized in terms of economic growth, development and sustainability needs. The updated NDP (2025) notes that the review includes an additional €34 billion relative to the previous 2021-2030 NDP including equity funding of €10 billion to 2030 to fund large strategic projects in energy, water and transport.

The National Planning Framework (NPF) sets out the Government’s high level strategic plan for shaping Ireland’s growth and development up to 2040. As of 30th April 2025, it has been announced that both Houses of the Oireachtas have approved the Revised National Planning Framework (2025), and it is now in effect. The Revised NPF (2025) therefore supersedes the NPF 2018, with the final document now available to view on the NPF website (<https://www.npf.ie/>).

As a strategic development framework, the NPF demonstrates an approach that joins up ambition for improvement across the different areas of Irish life, bringing the various government departments, agencies, state owned enterprises and local authorities together behind a shared set of strategic objectives for rural, regional and urban development. This is shown in NPF, Chapter 9, which states:

“The Government is committed to a long-term climate policy based on the adoption of a series of national plans over the period to 2050, informed by UN and EU policy. This is being progressed through the National Mitigation Plan and the National Climate Change Adoption Framework, both of which will be updated and reviewed periodically.”

In addition to legally binding targets agreed at EU level, there is a national objective for Ireland to transition to be a competitive, low-carbon, climate resilient and environmentally sustainable economy by 2050, based on the following:

- a) *“an aggregate reduction in carbon dioxide (CO₂) emissions of at least 80% (compared to 1990 levels) by 2050 across the electricity generation, built environment and transport sectors; and*
- b) *in parallel, an approach to carbon neutrality in the agriculture and land-use sector, including forestry, which does not compromise capacity for sustainable food production.”*

The key role of the NDP is to set out the updated configuration for public capital investment over the next 10 years in order to achieve the National Strategic Outcomes as set out within the NPF. An example of this is outlined in Chapter 13 ‘NSO 8 - Transition to a Climate-Neutral and Climate-Resilient Society’ of the NPF, which states:

“The Government will continue to support the deployment of additional electricity generation through the auction-based Renewable Electricity Support Scheme (RESS)”



When compared to the NPF 2018, the revised framework acknowledges that Ireland needs to make up for lost ground in relation to carbon reduction targets and move towards the objective of achieving climate neutrality by 2050 and places a stronger emphasis on 'carbon neutrality' through the new and revised policies and objectives. Central to the Revised Framework is the theme of 'Transition to a Carbon Neutral and Climate Resilient Society' which states:

- The Climate Action and Low Carbon Development (Amendment) Act was enacted in 2021 (the "Climate Act") 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 investment choices over the coming decades 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, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy to the major sources of demand.

In a similar manner to the 2018 edition of the document, the revised NPF is supported by a series of National Strategic Outcomes (NSOs) which the Framework seeks to deliver. These NSOs have undergone review and alteration as part of the revision process, making accommodations for legislation and policy published in the interim and progress that has been delivered on foot of the publication of the original NPF Policy document. The purpose of NSOs is to create a single vision, through a shared set of goals for every community across the country, and those which are appropriate to the proposed wind energy development are outlined in the table below:

Table 4-2: Revisions to National Strategic Outcomes (NSOs), Revised NPF (April 2025)

Policy Objective	Description
<p>National Strategic Outcome 8: Transition to a Carbon Neutral and Climate Resilient Society</p>	<p>Climate change is expected to have diverse and wide-ranging impacts on Ireland’s environment, society, and economic development, including on managed and natural ecosystems, water resources, agriculture and food security, human health, and coastal zones. Our low-lying areas and cities and many rural areas are potentially vulnerable if we do not take the appropriate steps to better manage the impacts of climate change.</p> <p>The Climate Action and Low Carbon Development (Amendment) Act enacted in 2021 commits to a 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.</p> <p>The national climate objective is to achieve a competitive, low-carbon, climate-resilient, biodiversity rich, and environmentally sustainable and carbon neutral economy by 2050.</p> <p>Sustainable land use management is required in order to achieve a balance between the built environment, natural environment, biodiversity and climate. The NPF is committed to the achievement of compact and sustainable growth, supporting the provision of sustainable transport options, water services delivery and the delivery of renewable energy development while protecting and where possible enhancing and restoring our natural environment in order to ensure sustainable development for our planet and future generations.</p> <p>Adaptation measures will be required to respond locally specific, place-based responses, which address not only climate impacts but also integrate coherently with local social, economic and ecological systems.</p>



Policy Objective	Description
	<p>The electricity sector faces a significant challenge to meet its requirements under the targets set out in Climate Action Plan 2024. Electricity will also play a key role in the decarbonisation of other sectors through electrification, including transport, heating, and industry.</p> <p>The accelerated delivery of additional renewable electricity generation is therefore essential for Ireland to meet its climate targets, reduce its greenhouse gas emissions, and improve its energy security by reducing reliance on imported fossil fuels and diversifying its electricity supply.</p> <p>New energy systems and transmission grids will be necessary for a more distributed, more renewables focused energy generation system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy. State-owned commercial enterprises are significant players in the energy market, which is subject to EU regulatory framework.</p> <p>The diversification of our energy production systems away from fossil fuels and towards green energy such as wind, wave, solar and biomass, together with smart energy systems and the conversion of the built environment into both generator/consumer of energy and the electrification of transport fleets require the progressive and strategic development of a different form of energy grid. To this end, Smart Specialisation will increase the regional uptake of new advanced technologies to increase the reach of the green transformation across Irish enterprise.</p> <p>The development of onshore and offshore renewable energy is critically dependent on the development of enabling infrastructure including grid facilities to bring the energy ashore and connect to major sources of energy demand.</p> <p>We also need to ensure more geographically focused renewables investment to minimise the amount of additional grid investment required, for example through co-location of renewables and grid connections.</p> <p>Ireland benefits from interconnection with the UK gas pipeline network and while there are two gas pipelines with two separate entry points into the island of Ireland, both pipelines are connected through a single facility in Moffat, Scotland. In addition, our gas storage capacity is limited, which poses a security of supply risk and constrains smoothing of seasonal fluctuation in gas prices.</p> <p>Green Energy</p> <ul style="list-style-type: none"> • Deliver 80% of our electricity needs from renewable sources by 2030 with a strategic aim to increase renewable deployment in line with EU targets and National policy objectives out to 2030 and beyond. It is expected that this increase in renewable deployment will lead to a greater diversity of renewable technologies in the mix. • Reinforce the distribution and transmission network to facilitate planned growth and distribution of a more renewables focused source of energy across the major demand centres • Strengthen energy security and resilience to support an island population of 8 million people through effective north-south electricity grid interconnection as well as exploring other EU interconnection options in the longer term to 2040. • Consideration of carbon neutral electricity generation that would be facilitated through harnessing carbon capture and storage (CCS). • National Interconnector (Sub-sea Ring around Ireland) or other solutions offer the potential to connect Ireland to the EU electricity grid System.



Policy Objective	Description
	<ul style="list-style-type: none"> Roll-out of the National Smart Grid Plan enabling new connections, grid balancing, energy management and micro grid development. District heating networks will be developed, where technically feasible and cost effective, to assist in meeting renewable heat targets and reduce Ireland’s GHG emissions.

There are a number of key alterations made to NSO 8 as part of the NPF revision process, which include:

- There has been a noticeable alteration in the terminology and wording surrounding carbon, which has been modified to state 'carbon neutral' as opposed to 'low carbon'. This emphasises that, from a government standpoint, carbon neutrality is being targeted and prioritised instead of a reduction which was an aim of the previous plan iteration.
- Reference is drawn to the requirement of efficiently delivering renewable energy infrastructure and projects within the Irish landscape. It is of note that attention is drawn to accelerating the delivery of such projects, and reference is drawn to energy systems and transmission grids.
- An ambitious target of delivering 80% of our electricity needs from renewable sources by 2030, in line with EU Targets and other national policy, is referenced and introduced into the NPF. This doubles the previously referenced target of 40% by 2020.
- District heating is introduced and referenced in the context of meeting renewable heat targets and reducing GHG emissions.

Additionally, a series of revised National Policy Objectives (NPOs) have been developed as part of the NPF review, which set the context for regional and local planning policy in Ireland. In the context of the proposed development, the following revised NPOs are considered the most relevant (see Table 4-3):

Table 4-3: National Policy Objectives (NPOs) from Project Ireland 2040: The National Planning Framework, April 2025

Policy Objective	Description
National Policy Objective 55	To support, the progressive development of Ireland’s offshore renewable energy potential, the sustainable development of enabling onshore and off-shore infrastructure including domestic and international grid connectivity enhancements, non-grid transmission infrastructure, as well as port infrastructure for the marshalling and assembly of wind turbine components and for the operation and maintenance of offshore renewable energy projects.
National Policy Objective 66	The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the medium and longer-term requirements of all relevant environmental and climate legislation and the sustainable management of our natural capital.
National Policy Objective 69	Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions as expressed in the most recently adopted carbon budgets.



Policy Objective	Description																																										
National Policy Objective 70	Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a climate neutral economy by 2050.																																										
National Policy Objective 71	Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development.																																										
National Policy Objective 72	Support an all-island approach to the delivery of renewable electricity through interconnection of the transmission grid.																																										
National Policy Objective 73	Manage the sustainable development of Ireland’s renewable energy resources, having regard to their environmental, social and economic impacts, and to contribute to meeting Ireland’s national and EU renewable energy targets, thereby contributing to climate action objectives.																																										
National Policy Objective 74	<p>Each Regional Assembly must plan, through their Regional Spatial and Economic Strategy, for the delivery of the regional renewable electricity capacity allocations indicated for onshore wind and solar reflected in Table 9.1 below, and identify allocations for each of the local authorities, based on the best available scientific evidence and in accordance with legislative requirements, in order to meet the overall national target.</p> <p>Table 9.1 Regional Renewable Electricity Capacity Allocations</p> <table border="1"> <thead> <tr> <th>Region</th> <th>Energised capacity 2023 (MW)</th> <th>Additional Renewable Power Capacity Allocations (MW)</th> <th>Total % of National Share in 2030</th> <th>Energised Capacity 2023 (MW)</th> <th>Additional Renewable Power Capacity Allocations (MW)</th> <th>Total % of National Share in 2030</th> </tr> </thead> <tbody> <tr> <td></td> <td colspan="3">Onshore Wind</td> <td colspan="3">Solar PV</td> </tr> <tr> <td>Eastern and Midlands</td> <td>284</td> <td>1,966</td> <td>25%</td> <td>306</td> <td>3,294</td> <td>45%</td> </tr> <tr> <td>Northern and Western</td> <td>1,761</td> <td>1,389</td> <td>35%</td> <td>0.3</td> <td>959</td> <td>12%</td> </tr> <tr> <td>Southern</td> <td>2,622</td> <td>978</td> <td>40%</td> <td>138</td> <td>3,302</td> <td>43%</td> </tr> <tr> <td>Total</td> <td>4,667</td> <td>4,333</td> <td></td> <td>445</td> <td>7,555</td> <td></td> </tr> </tbody> </table>	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	
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National Policy Objective 75	Local Authorities shall plan for the delivery of Target Power Capacity (MW) allocations consistent with the relevant Regional Spatial and Economic Strategy, through their City and County Development Plans.																																										



Furthermore, a number of new sections have been introduced into the NPF as part of this revision process with regards to renewable energy. The key points from each of these 4 no. new sections have been summarised in turn below:

- **Energy Security in Ireland:** This draws reference to the 'Energy Security in Ireland to 2030' document published by the government in November 2023. It details at a high level that Ireland's future energy will be secure by moving from a fossil-fuel based energy to system to an electricity led system and outlines that as part of the review process that risks to oil, natural gas, and electricity were considered. The section discusses at length the role of gas in facilitating a just and secure transition to this new energy system, Irish sources of gas, and that exiting infrastructure and supply sources are able to meet Ireland's gas demands in the medium and long run. However, it is also emphasised that Ireland relies heavily on gas imports from the UK and any impact would be hugely significant on Ireland's economic and social well-being.
- **Renewable Electricity:** This section outlines the ambitious targets to achieve 9GW of onshore wind, 5GW of offshore wind, and 8GW of solar by 2030 which have been set. It once again references that the accelerated delivery of additional renewable electricity generation is critical in achieving these targets and other targets as outlined at an EU level.
- **Rural Areas and Energy Production:** Reference is drawn to rural areas continuing to play a role in contributing to Ireland's energy future. However, novel ideas such as the co-location of energy projects and agricultural industry; or the development of renewable energy projects on urban commercial and industrial sites including brownfield sites are introduced. In many ways, this section can be viewed as an attempt to maximise the use of limited land for renewable projects. Further discussion surrounding the potential economic and community benefits is also elaborated upon.
- **Making a just transition - Peatlands:** It has been identified that 21% of the Irish landscape comprises bogland, and some of Ireland's cutaway bogs are suitable for facilitating the generation of energy, most notably wind or biomass. However, it is outlined that this land area is Ireland's largest carbon sink, occupying 64% of our total soil organic carbon stock. In this context, it is identified that a careful balance between the development of renewable energy projects on bogland and its preservation will need to be achieved going forward.

4.4.5 Climate Action Plan 2024 (CAP24) and Climate Action Plan 2025 (CAP25)

The Government published Climate Action Plan 2024 (CAP24) on 20th December 2023, this was the third updated action plan following on from the inaugural plan of 2019 which was a result of the Irish Government declaring a climate and biodiversity emergency on 9th May 2019. As of April 2025, Climate Action Plan 2025 (CAP25) has been published, with the government's website stipulating that CAP25 is to be read in conjunction with CAP24.

The CAP provides a framework for delivering the Government's target of a 51% reduction (relative to 2018) in greenhouse gas (GHG) emissions by 2030. CAP24 follows the Climate Act, which commits Ireland to a legally binding target of net zero greenhouse gas emissions no later than 2050, and a reduction of 51% by 2030. The Act provides a governance framework for annual revisions of the Climate Action Plan and the development of a National Long-Term Climate Action Strategy at least once every ten years. As part of this plan, the Government is also committed to reducing emissions by an average 7% per annum by 2030. The CAP24 is underpinned by a series of sectoral emissions reduction ambitions and enabling actions.



CAP24 sets out an objective to more than double Ireland’s onshore wind energy capacity to 9 GW by 2030 in order to meet new renewable energy targets and reduce emissions. Key actions of relevance to the Project include:

- The electricity system must achieve a 75% reduction in CO₂, reaching 3MtCO₂eq in the final year of 2026 - 2030 carbon budget period.
- Deliver up to 9 GW onshore wind (with 6GW by 2025) by 2030.
- Complete a revised version of Shaping our Electricity Future to define required new grid construction and reinforcements to achieve sectoral ceilings and carbon budgets.
- As an urgent priority, establish the investment framework and competitive market, arrangements needed to deliver zero carbon system services.
- Align the relevant constituent elements of the planning and permitting system to support accelerated renewable energy development and ensure renewables will be considered to be in the overriding public interest.
- Action EL/24/1: Establish an Accelerating Renewable Electricity Taskforce to publish programme of work.
- Action EL/24/2: Establish an Offshore Wind Delivery Taskforce to publish key actions for 2024.
- Action EL/24/3: Revision to the National Planning Framework to include regional capacities for the allocation of national targets at a regional level in order to inform local development plan policy.
- Action EL/24/4: Publish Regional Renewable Electricity Strategies.
- Action EL24/6: Publish revised methodology for Local Authority Renewable Energy Strategies.
- Action EL/24/7: Publish new Electricity Generation Grid Connection Policy.
- Action EL/24/8: Deliver onshore and offshore RESS auctions as per the annual RESS auction calendar.
- Action EL/24/9: Develop a Private Wires Policy Framework.
- Action EL/24/13: Publish annual report setting out identifiable public benefits delivered by renewable energy sector.
- Action EL/24/14: Complete economic and spatial analysis to inform the development of the ORE Future Framework.
- Action: EL/24/15 Submit to DECC timelines of large-scale onshore grid development projects to be delivered in 2024 and publish an appropriate version.
- Action: EL/24/19 Develop and publish data sets showing the likely locations, volumes, and load profile of surplus renewable generation on our electricity grid.
- Action EL/24/20: Implementation of CRU Energy Demand Strategy.
- Action EL/24/22: Implementation of enhanced emissions reporting framework for electricity emissions for large energy users and the system operators dispatch actions.
- Action EL/24/30 Complete a stakeholder consultation for an evidence-based decarbonisation pathway for the electricity system to net-zero and support future iterations of the Climate Action Plan.



CAP25 reiterates many of these objectives outlined in CAP24, including the need to double Ireland's onshore wind energy capacity to 9 GW by 2030 in order to meet new renewable energy targets and reduce emissions. The CAP25 comprises a number of new, strategic actions however much of the detail behind the actions is still contained within CAP24. The key CAP25 actions of relevance to this project include:

- It establishes a target for Carbon Budget 1 (2021-2025) of 40 MtCO₂eq, requiring a 75% across all sectors. Current EPA projections indicating an overshoot of over 1 MtCO₂eq.
- It establishes a target for Carbon Budget 2 (2026-2030): 20 MtCO₂eq requiring a 75% across all sectors. Current EPA projections indicating an overshoot of over 5MtCO₂eq.
- Align, as relevant, with the Accelerating Renewable Electricity Taskforce Implementation Plan which sets out a roadmap for the actions to be taken in the near-term to help meet our 2030 targets.
- Action EL/25/1: Manage the Renewable Electricity Support Scheme.
- Action EL/25/2: Publish a long Duration Energy Storage Procurement recommendations paper.
- Action EL/25/3: Development a data sharing framework regarding Low Carbon Technologies connection to the electricity grid.
- Action EL/25/4: Develop Smart-flex standards roadmap.
- Action EL/25/5: Develop consumer-led flexible demand processes.

CAP25 further states:

"The importance of upgrading infrastructure, especially the electricity grid, was highlighted to support the transition to clean energy. Across all areas, the submissions stressed the importance of a just transition, ensuring that no communities are left behind as Ireland moves towards a low-carbon economy, with a need for enhanced research, innovation, and cross-sector collaboration also consistently emphasised."

Whilst this development pertains specifically to a 110kV GCR, 33kV CNR, and 110kV Substation along with all associated ancillary development works it relates to the consented Coom Green Energy Park Wind Farm (permitted under ACP Ref: 308885-20) and will assist in the delivery of a significant alternative source of renewable energy to the national grid. This in turn will assist the government in achieving the targets outlined above.

4.4.6 Eirgrid Assessment of Progress with Carbon Budget Compliance

Emissions analysis completed by Eirgrid⁸ in December 2023 indicated that in a best case / optimistic case scenario Ireland will have utilised 59.8 Mt of our 60 Mt CO₂ equivalent emissions budget by the end of 2029, leaving a budget of only 0.2 Mt for 2030. However, in their central case scenario they are predicting that Ireland is currently on track to substantially overshoot this emissions target with emissions across the decade projected to reach 79.5 Mt. This would represent a 32.5% exceedance of our legally binding limits. This central case assessment is underpinned by assumptions in relation to the installed capacity of renewables set out in Table 4-4, below.

⁸ <https://www.gov.ie/pdf/?file=https://assets.gov.ie/245172/2c2fd729-261b-4b64-af5e-c7f5f8d18924.pdf#page=null>



Table 4-4: EirGrid central case installed capacity assumptions resulting in a 32.5% exceedance of our sectoral emissions ceilings

Plant	Unit	2022	2023	2024	2025	2026	2027	2028	2029	2030
Onshore Wind	MW	4717	5046	5531	5800	6100	6400	6700	7000	7000
Solar PV	MW	462	1121	1870	2569	3155	3741	4327	4914	5500
Offshore Wind	MW	25	25	25	25	25	25	725	2865	5000

It is also worth noting that:

- This scenario is one which sees Ireland falling short on its 9000MW installed capacity target for onshore wind and is non-compliant with our carbon budget and sectoral emissions ceilings. As per Eirgrid data published in October 2025, only approx. 5094MW of onshore wind has been installed, meaning the overshoot of this emissions target is likely to be even greater. Additionally, no additional offshore wind has received planning permission yet, meaning it is highly unlikely that any additional installed capacity will come online until after 2030. With the existing 25MW having filed an application to decommission in 2025, the likely 2030 installed capacity for offshore wind is actually 0MW.
- Data for RESS 5 issued in October 2025 indicate that a total of just 218.84 MW was successful for Onshore Wind which is far below the projected requirements to meet targets which is estimated at c. 2000MW needs to be approval or connection annually⁹

4.4.7 All-Island Resource Adequacy Assessment 2025-2034

The All-Island Resource Adequacy Assessment 2025-2034 represents the first edition of the framework, an evolution of the previous annual Generation Capacity Statement. The report seeks to outline the expected electricity demand and the level of generation capacity that will be required on the island of Ireland over the next 10 years to maintain security of electricity supply and economic growth. This analysis will then be used to support Government and Regulatory Authorities in the development of energy policy. As the transmission system operators for Ireland and Northern Ireland, EirGrid and SONI are working to ensure that everyone has electricity when they need it while preparing the transmission grid to provide 80% of our power from renewable sources, in line with Government targets in both jurisdictions.

The Assessment indicates a potentially challenging outlook in Ireland across the study period up to 2034. Looking out to 2030, electricity demand is set to increase as consumers use electricity in new ways. New government policies are expected to help guide us away from fossil fuels toward alternative heating methods, such as electric heat pumps, and cleaner modes of transport, such as electric vehicles. This changing demand and generation supply landscape will require coordinated management of both the volume and type of new capacity, alongside new ways of managing increasing demand to ensure security of supply.

⁹ <https://windenergyireland.com/blog/buid-our-grid-a-reinforced-grid-more-available-clean-electricity-0-0-0-0-0-0-0-0-0-0#:~:text=Annual%20figures&text=Wind%20Energy%20Ireland%20estimates%20that,the%20end%20of%20last%20year.%E2%80%9D>



In this assessment, a new approach has been taken in terms of assessing resource adequacy and two scenarios have been identified namely a Base and a Secure scenario. The Base scenario analyses the adequacy position in line with the European Resource Adequacy Assessment (ERAA), and the Secure scenario analyses the system considering Low Imports, Annual Run Hour Limits (ARHL) and other operational requirements. EirGrid and SONI consider the Secure scenario is most prudent and should be adopted for decisions relating to securing capacity for the continued secure and sustainable operation of the power system, noting that capacity market auctions remain an option to procure new generation which could address capacity shortfalls in the medium to long term.

Ireland has a renewable policy goal to deliver 80% renewable electricity by 2030. EirGrid has considered the Renewable Electricity Support Scheme (RESS) and Offshore RESS auction results, ESBN connection data and latest transmission connections processes data to develop a trajectory for deployment of new renewable capacity. Furthermore, EirGrid have engaged with the Sustainable Energy Authority of Ireland (SEAI) who have developed renewable generation forecasts based on judgments from a pool of expert stakeholders. These forecasts have been used in the core assessment in this report.

The results of the assessment notes that from 2025 to 2027, both scenarios (Base and Secure) show the system is outside of standard, meaning additional capacity is required. From 2028 to 2032, the base scenario is within standard, meaning there is sufficient capacity to operate the system under normal conditions. The secure scenario, however, remains outside of standard, meaning an additional 600-800 MW is required to ensure we can continue to balance supply and demand under more challenging conditions. The additional MW capacity is required in the secure scenario to provide system reserve requirements (for when the demand for electricity is high) as well as facilitate network outages (which are needed when we connect new generation and infrastructure to the grid). From 2033 to 2034 both scenarios show the system is outside of standard, meaning additional capacity is required in the range of 100-1000 MW.

EirGrid considers the Secure scenario is most prudent and should be adopted for decisions relating to securing capacity for the continued secure and sustainable operation of the power system.

The Proposed Development will benefit the above mentioned shortcomings and additional capacities through the delivery of improvements to grid infrastructure and network, and the development of a substation to the requisite standards which will remain in situ even after the associated Wind Farm (permitted under a separate Planning Application) is formally decommissioned.

4.4.8 Ireland's Greenhouse Gas Emission Projections, 2023-2050

The Environmental Protection Agency (EPA) are responsible for developing annual national emission projections for greenhouse gases for all key sectors of the economy, including transport.

The EPA's publication entitled Ireland's Greenhouse Gas Emission Projections (2024)¹⁰ provides an updated assessment of Ireland's projected greenhouse gas emissions out to 2050 which includes an assessment of progress towards achieving its 51% emission reduction targets to 2030 set down under the EU Effort Sharing Decision (Decision No 406/2009/EC). Ireland's 2020 target was to achieve a 20% reduction of non-Emission Trading Scheme (non-ETS) sector emissions (i.e. agriculture, transport, the built environment, waste and non-energy intensive industry) on 2005 levels with annual binding limits set for each year beyond 2020. 2030 targets for EU Member States were adopted by the European Council in April 2023. Ireland's 2030 target under the Effort Sharing Regulation is a 42% reduction of emissions compared to 2005 levels by 2030. There will be binding annual limits over the 2021-2030 period to meet that target.

¹⁰ [EPA-Ireland's-GHG-Projections-Report-2023-2050.pdf](#)



4.4.9 Climate Change Advisory Council (CCAC) Assessment

In its 2025 Annual Review 'Our Changing Climate in 2024', published on 19th March 2025, the CCAC concluded that, at the current rate of policy implementation is too slow and fragmented, and more effective engagement across all segments of policy and society is required to empower sustainable decision-making and to understand and remove barriers to action.

This stark warning was issued shortly after warning from the Environmental Protection Agency (EPA) in its report 'Ireland's Final Greenhouse Gas Emissions 1990-2022' (2024), which confirmed that Ireland is now tracking a 29% reduction in its greenhouse gas emissions by 2030 compared with its 51% legally binding target.

4.4.10 National Onshore Wind Targets - State of play (Jan 2025)

Published on 16th January 2025, the national onshore wind targets from late 2024 are shown below in a database of projects at various stages of development. These figures give an approximate indication of the National Onshore Wind Targets - State of play and are prepared from sources including ESB Networks and EirGrid documents, and publicly available information sources such as the County Council Planning Portals or An Coimisiún Pleanála (the "Commission").

At the time of the latest update in December 2024, the database indicated that the onshore wind pipelines in Ireland could be summarised as shown in Table 4-5 below:

Table 4-5: Summary of onshore wind development projects at specific stages in the development process

Project Phase / Category	MW's
Energised	c. 4,812MW
With planning permission and grid access	c. 717MW (10 projects)
With planning permission and queued for grid access	c. 31
In planning process	c. 1,598MW (30 projects)
Energised but will be 25 years or older in 2030 (i.e. energised in 2005 or before)	c. 500MW

If we take reasonably optimistic assumptions in relation to the various projects noted above we would optimistically estimate that all currently know projects will deliver c. 7,627MW out of a total target of 9,000MW by 2030.

Noting the above attrition factors and points below on timing for delivery, this implies that the State needed to see planning applications for c. 3, 126MW in 2025 with an 80% success rate in planning if the State is to have any chance of delivering on our 9,000MW onshore wind target. It is also important to note that the accelerated delivery of this onshore wind target is critical to achieving compliance with the legally binding sectoral emissions ceilings for the electricity sector. A review of 2025 statistics indicate that planning was granted for only c. 527 MW up to the end of quarter 3 2025¹¹.

¹¹ <https://windenergyireland.com/blog/tag/planning>



This above approximate conclusion applies an appropriate attrition factor of between 30% to 35% for on-shore wind projects, which includes projects which may be delayed or cancelled due to failure to obtain planning permission, lack of funding, or financial viability, technical challenges to site suitability or grid connection and community opposition to projects.

4.4.11 National Energy Security Framework

In response to the European Commission's REPowerEU action statement the Government of Ireland issued the National Energy Security Framework in June 2023, in order to address Ireland's energy security needs in the context of the war in Ukraine. It sets out how Ireland is seeking to phase out dependency on Russian gas, oil and coal imports as soon as possible in order to address the urgent need to secure Ireland's energy supply. It is focused on three key areas of work:

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

The ambitious programme for government is prioritising carbon neutrality and renewable energy generation. In light of this, it is important for the nation to rely on proven technologies such as onshore wind to meet the near and long-term objectives. Furthermore, the National Energy Security Framework underlines the importance of new renewable energy generation projects, such as that facilitated by the Proposed Development, in securing Ireland's energy supply in light of the ongoing conflict in the Ukraine and associated energy supply chain issues leading to shortages and energy price increases.

4.4.12 National Policy and Legislation Conclusion

The Proposed Development is supported by and aligns with national policy as set out above. The Proposed Development supports the enhancement of the competitiveness of rural areas; will facilitate the delivery of an alternative, renewable source of electricity to the national grid supporting the diversification of Ireland's energy mix which subsequently contributes to increasing Ireland's energy security; and will also deliver upgrades to the existing grid network of the region.

The Proposed Development also contributes positively towards achieving the nation's target increase in renewable energy to 80% by 2030 as set out in the Climate Action Plans (CAP24 and CAP25) by facilitating the connection of the permitted Wind Farm to the national grid.

The Proposed Development support national targets of climate change mitigation and reduction in greenhouse gas emissions where significant focus has been set out in the Climate Action and Low Carbon Development (Amendment) Act 2021, which is prioritising carbon neutrality and renewable energy generation.

In light of this, it is important for the nation to rely on proven technologies such as on providing renewable electricity generation to the grid in order to meet the near-term and long-term objectives.



4.5 Regional Policies

4.5.1 Southern Regional Spatial & Economic Strategy 2020-2031

The Southern Regional Spatial & Economic Strategy (RSES) came into effect on 31st January 2020. The RSES sets out a strategy to implement the NPF at a regional level and covers the period from 2020-2026. The RSES sets out a strategic vision which includes actions to mitigate against climate change. The RSES recognises the urgency to transition to a low carbon future, accelerate the transition towards a low carbon economy and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport, and agriculture in order to safeguarding and enhance the region's environment through sustainable development, prioritising action on climate change across the region, driving the transition to a low carbon and climate resilient society.

Through its vision statement, the RSES seeks to:

- Nurture all our places to realise their full potential.
- Protect, and enhance our environment.
- Work to achieve economic prosperity and improved quality of life for all our citizens.
- Accommodate expanded growth and development in suitable locations; and
- Promote the region's international reputation as one of Europe's most creative, innovative, greenest and liveable regions.

The RSES states the following in relation to wind energy:

"Wind energy is currently the largest contributor of renewable energy and it has the potential to achieve between 11-16GW of onshore wind and 30GW of offshore wind by 2050 (SEAI, 2016). The sector can make a significant contribution to meeting national energy demands while attaining our energy and emissions targets for 2020 and beyond."

Section 8.2 of the RSES outlines the strategy to supporting a strategic energy grid. In it, the strategy outlines its support for a safe, secure and reliable system of transmission and distribution of electricity and the successful implementation of the Ireland's Grid Development Strategy, Your Grid, Your Tomorrow.

The RSES also recognises the importance of the region in improving strategic energy grid infrastructure, stating:

"There is significant potential to use renewable energy across the Region to achieve climate change emission reduction targets. With costs actively driven down by innovation in solar, onshore and offshore wind in particular, the renewable industry is increasingly cost competitive. The RSES supports renewable industries and requirements for transmission and distribution infrastructure."

The RSES includes a range of policy objectives which support the development of renewable energy projects such as the Proposed Development.



Objectives include the following:

Table 4-6: Regional Spatial and Economic Strategy Objectives

Policy	Description
RPO 50	It is an objective to further develop a diverse base of smart economic specialisms across the rural Region, including innovation and diversification in (among other things) renewable energy as a dynamic driver for the rural economy.
RPO 56	The RSES recognizes the urgency to transition to a low carbon future and it is therefore an objective to accelerate the transition towards low carbon economy and circular economy through mechanisms such as the Climate Action Competitive Fund;
RPO 95	It is an objective to support implementation of the National Renewable Energy Action Plan (NREAP), and the Offshore Renewable Energy Plan and the implementation of mitigation measures outlined in their respective SEA and AA and leverage the Region as a leader and innovator in sustainable renewable energy generation.
RPO 96	It is an objective to support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate renewable energy sources and ensure our national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grows
RPO 97	It is an objective to support the sustainable technology upgrading and conversion of power stations in the Region to increase capacity for use of energy efficient and renewable energy sources.
RPO 98	It is an objective to support the development of a Regional Renewable Energy Strategy with relevant stakeholders
RPO 99	It is an objective to support the sustainable development of renewable wind energy (on shore and offshore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.
RPO 100	It is an objective to support continued innovation and research in the energy sector and to develop a role as an international hub for energy innovation.
RPO 101	It is an objective to support continued innovation and research in the energy sector and to develop a role as an international hub for energy innovation.
RPO 102	It is an objective to support initiatives for energy research funding within our Region to accelerate diversification away from fossil fuels to green energy, including the potential of wind, wave, solar, biomass, biofuels, biogas and hydrogen in the Region
RPO 103	It is an objective to support the sustainable development of interconnection infrastructure, in particular the potential for the sustainable development of an international connection between Ireland and France in the Region.



Policy	Description
RPO 219	It is an objective to support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers (subject to appropriate environmental assessment and the planning process) to ensure the energy needs of future population and economic expansion within designated growth areas and across the Region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs.
RPO 220	It is an objective to support the Integrated Single Electricity Market (I-SEM) as a key priority for the Region and seeks the sustainable development and reinforcement of the energy grid including grid connections, transboundary networks into and through the Region and between all adjacent Regions subject to appropriate environmental assessment and planning processes.
RPO 221	<p>a. Local Authority City and County Development Plans shall support the sustainable development of renewable energy generation and demand centres such as data centres which can be serviced with a renewable energy source (subject to appropriate environmental assessment and the planning process) to spatially suitable locations to ensure efficient use of the existing transmission network;</p> <p>b. The RSES supports strengthened and sustainable local/community renewable energy networks, micro renewable generation, climate smart countryside projects and connections from such initiatives to the grid. The potential for sustainable local/community energy projects and micro generation to both mitigate climate change and to reduce fuel poverty is also supported;</p> <p>c. The RSES supports the Southern Region as a Carbon Neutral Energy Region.</p>
RPO 222	It is an objective to support the development of a safe, secure and reliable supply of electricity and to support and facilitate the development of enhanced electricity networks and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this plan under EirGrid's (2017) Grid Development Strategy (subject to appropriate environmental assessment and the planning process) to serve the existing and future needs of the Region and strengthen all-island energy infrastructure and interconnection capacity.
RPO 224	Local Authorities shall work in partnership with existing service providers to facilitate required enhancement and upgrading of existing infrastructure and networks (subject to appropriate environmental assessment and the planning process) and support the safeguarding of strategic energy corridors from encroachment by other developments that could compromise the delivery of energy networks.

4.5.1.1 Project Response:

The Proposed Development aligns with the goals and objectives of the RSES, which prioritises the transition to a low-carbon economy through increased deployment of renewable energy at suitable locations. The Proposed Development supports and facilitates the approved Coom Green Energy Park which is set to provide green energy with a total Maximum Export Capacity (MEC) of approx. 105MW. The Proposed Development (110kV GCR, 33kV CNR, and 110kV Substation) will also serve to improve the overall grid stability in the area.

4.6 Local Planning Policy

It is a specific planning policy requirement under Section 28 of the Planning & Development Act 2000 (as amended) that in making Development Plans a planning authority has regard to national policy on renewable energy as contained in the aforementioned policy documents. A County Development Plan (CDP) is required to indicate how the implementation of the Development Plan will contribute to realising overall national targets on renewable energy and climate change mitigation.



This section of the chapter addresses each of the relevant Cork County Development Plan sections in turn. Please also refer to the Project Planning Statement, submitted as part of this application.

4.6.1 Cork County Development Plan 2022 - 2028

The Cork County Development Plan 2022-2028 was adopted on the 25th of April 2022 and came into effect on the 6th of June 2022 as the main guiding planning policy for development within the Cork County Council administrative area. The Plan sets out policy and objectives in relation to economic development, biodiversity, and energy and climate action. For the purposes of this chapter, in relation to the location of the Proposed Development, particular consideration has been given to Volume 3 - North Cork of the County Cork Development Plan 2022-2028.

Section 13.5 of the Cork County Development Plan 2022-2028 outline the development strategy in relation to Renewable Energy. In it, the Development Plan outlines the goal to achieve 70% renewable electricity by 2030 by phasing out coal and peat-fired electricity generation plants, increasing renewable electricity, and reinforcing the grid. It further outlines the importance of Cork County to show its ability to help contribute to achieving the national targets.

Section 13.6.2 of the Development Plan details the following:

"In 2020, installed wind capacity reached 3,700 MW within the Republic of Ireland. Cork County currently has 38 commissioned wind farms with capacity of 603MW, equivalent to approximately 16% of the national capacity. However, if Ireland is to meet our renewable energy target then we need to double capacity nationally over the next ten years. On a pro rata basis, that could see capacity in Cork expand to 1,100MW. At present they are valid but unimplemented permissions in the county for a further 200MW of wind power."

Project Response:

In line with the above, the Proposed Development offers a chance to increase the wind capacity in County Cork and contribute positively towards reaching the national targets, through facilitating the export of energy generated by the approved Wind Farm to the national grid.

Furthermore, the Proposed Development will facilitate the delivery of the Coom Green Energy Park, which is a valid (granted permission under ACP Case Ref. 308885) but unimplemented permission. This further contributes towards the Council's aspirations, as outlined in the Development Plan, through reducing the amount of Wind Power consented but not delivered or commissioned.

In Section 13.7 the Development Plan outlines the planning process for renewable energy development proposals, including specifics relating to grid connection. It states:

"In particular grid connections with the potential to impact on the strategic function of the national road network should be discussed and agreed with Transport Infrastructure Ireland and should use alternative available routes where feasible in the first instance."



Project Response:

Whilst the cabling associated with the Proposed Development will be located within the road, it will not impact on the strategic function of the network. None the less, the Applicant has conducted extensive consultation with Direct Route, TII, and the Council's Road Department to discuss the Proposed Development and ensure it achieves all applicable standards and requirements. The outcome of these consultations has informed the design of the Proposed Development.

The Applicant also acknowledges the possibility of temporary local disruptions during the construction phase of the Proposed Development, as such, communications with the general public, Direct Route, TII and the Council's Roads Department will continue throughout the construction phase of the Proposed Development. Please refer to Chapter 12 and associated Traffic Management Plan contained within the CEMP (Appendix 2.2, Volume 3) for further details.

In relation to Renewable Energy, the Plan sets out objectives and identifies suitable locations for wind energy projects, in regard to the relevant policy context. Relevant objectives are listed in Table 4-7:

Table 4-7: Extracts from the Cork County Council Development Plan 2022-2028

Policy	Description
Chapter 2 - Core Strategy	
CS 2-5 North Cork Strategic Planning Area	(g) Facilitate the development of renewable energy projects in support of national climate change objectives.
Project Response: The Proposed Development is in line with CS 2-5 (g) as it will facilitate the transfer of energy of a permitted wind farm to the national grid, which will help achieve the national climate change obligations and targets.	
Chapter 8 - Economic Development	
EC 8-13 Rural Economy	<ul style="list-style-type: none"> a) Encourage employment growth in County towns to support the population of the towns and their wider rural catchments. b) Strengthen rural economies through the promotion of innovation and diversification into new sectors and services including to ensure economic resilience and job creation. c) New development in rural areas should be sensitively designed and planned to provide for the protection of the biodiversity of the rural landscape.
Project Response: The Proposed Development will introduce a new, innovative technology into the local economy, in the form of delivering a permitted Wind Farm and associated grid connection. This in turn will provide support for additional employment opportunities for the local economy (both direct and indirect) and further diversify the economy. The Proposed Development is also sensitive of its surroundings, with a majority of the works being proposed involving underground cabling (please refer to EIAR Volume II, Chapter 2 - Development Description for further detail). The Applicant adopted a 'mitigation by avoidance' approach and as such any areas of sensitivity or significant importance to biodiversity have been avoided where possible and as such biodiversity protection has been at the forefront of the Proposed Developments design (please refer to EIAR Volume II, Chapter 9: Biodiversity). It is also of significance to note that a suite of biodiversity enhancement measures will be delivered through the permitted Wind Farm Application, which this Application will directly support. In conclusion, the Proposed Development is in line with the policy objectives relating to Economic Development outlined above.	



Policy	Description
Chapter 13 - Energy and Telecommunications	
ET 13-1 Energy	<p>a) Ensure that County Cork fulfils its potential in contributing to the sustainable delivery of a diverse and secure energy supply and to harness the potential of the county to assist in meeting renewable energy targets and managing overall energy demand.</p> <p>b) During the life of this plan, the Planning Authority will prepare a renewable energy strategy for the county</p>
ET 13-2 Renewable Energy	<p>a) Support Ireland’s renewable energy commitments as outlined in Government Energy and Climate Change policies by facilitating the development of renewable energy sources such as wind, solar, geothermal, hydro and bio-energy and energy storage at suitable locations within the county where such development has satisfactorily demonstrated that it will not have adverse impacts on the surrounding environment (including water quality), landscape, biodiversity or amenities.</p> <p>b) Support and facilitate renewable energy proposals that bring about a direct socio-economic benefit to the local community. The Council will engage with local communities and stakeholders in energy and encourage developers to consult with local communities to identify how they can invest in/gain from significant renewable energy development.</p> <p>c) Support the development of new and emerging renewable energy technologies / fuels for the transport sector.</p> <p>d) To promote the potential of micro renewables where it can be demonstrated that that it will not have adverse impacts on the surrounding environment (including water quality), landscape, biodiversity or amenities</p>
ET 13-4 Wind Energy	<p>In order to facilitate increased levels of renewable energy production consistent with national targets on renewable energy and climate change mitigation as set out in the National Energy and Climate Plan 2021-2030, the Climate Action Plan 2021, and any updates to these targets, and in accordance with Ministerial Guidelines on Wind Energy Development, the Council will support further development of on-shore wind energy projects including the upgrading, repowering or expansion of existing infrastructure, at appropriate locations within the county in line with the Wind Energy Strategy and objectives detailed in this chapter and other objectives of this plan in relation to climate change, biodiversity, landscape, heritage, water management and environment etc.</p>
ET 13-5 Wind Energy Projects	<p>a) Support a plan led approach to wind energy development in County Cork through the identification of areas for wind energy development. The aim in identifying these areas is to ensure that there are minimal environmental constraints, which could be foreseen to arise in advance of the planning process.</p> <p>b) On-shore wind energy projects should focus on areas considered ‘Acceptable in Principle’ and ‘Areas Open to Consideration’ and generally avoid “Normally Discouraged” areas as well as sites and locations of ecological sensitivity</p>



Policy	Description
Chapter 13 - Energy and Telecommunications	
ET 13-7 Open to Consideration	<p>Commercial wind energy development is open to consideration in these areas where proposals can avoid adverse impacts on:</p> <ul style="list-style-type: none"> • Residential amenity particularly in respect of noise, shadow flicker and visual impact; • Urban areas and Metropolitan/Town Green Belts; • Natura 2000 Sites (SPA's and SAC's), Natural Heritage Areas (NHA's), proposed Natural Heritage Areas and other sites and locations of significant ecological value. • Architectural and archaeological heritage; • Visual quality of the landscape and the degree to which impacts are highly visible over wider areas. In planning such development, consideration should also be given to the cumulative impacts of such proposals.
ET 13-9 National Wind Energy Guidelines	<p>Development of onshore wind should be designed and developed in line with the 'Planning Guidelines for Wind Farm Development 2006' and 'Draft Wind Energy Development Guidelines 2019' and any relevant update of these guidelines</p>
ET 13-10 Development in line with Best Practice	<p>Ensure that wind energy developments in County Cork are undertaken in observance with best industry practices, and with full engagement of communities potentially impacted by the development. In accordance with the Code of Practice 'Good Practice for Wind Energy Development Guidelines 2016', wind energy development operators are required to put in place an effective complaints procedure in relation to all aspects of wind energy development projects, where members of the public can bring any concerns they have about operational difficulties, including noise and nuisance to the attention of the wind energy development operator.</p>
ET 13-11 Public Consultation and Community Support	<p>(a) Require wind energy developers to carry out active public consultation with the local community in advance of and in addition to the statutory public consultation required as part of the planning application process.</p> <p>(b) Applications for large scale wind energy development require a 'Community Report' with the planning application documents detailing the full extent of community and wider public engagement.</p>
ET 13-21 Electricity Network	<p>a) Support and facilitate the sustainable development, upgrade and expansion of the electricity transmission grid, storage, and distribution network infrastructure.</p> <p>b) Support the sustainable development of the grid including strategic energy corridors and distribution networks in the region to international standards.</p> <p>c) Facilitate where practical and feasible, infrastructure connections to wind farms, solar farms, and other renewable energy sources subject to normal proper planning considerations.</p> <p>d) Proposals for development which would be likely to have a significant effect on nature conservation-sites and/or habitats, or species of high conservation value will only be approved if it can be ascertained, by means of an Appropriate Assessment or other ecological assessment, that the integrity of these sites will not be adversely affected.</p>



Policy	Description
Chapter 13 - Energy and Telecommunications	
ET 13-22 Transmission Network	<p>a) To co-operate and liaise with statutory and other energy providers in relation to power generation in order to ensure adequate power capacity for the existing and future needs of the County including business and residential demands.</p> <p>b) Proposals for new electricity transmission networks will need to consider the feasibility of undergrounding or the use of alternative routes especially in landscape character areas that have been evaluated as being of high landscape sensitivity.</p> <p>This is to ensure that the provision of new transmission networks can be managed in terms of their physical and visual impact on both the natural and built environment and the conservation value of European sites.</p> <p>c) Proposals for development which would be likely to have a significant effect on nature conservation-sites and/or habitats, or species of high conservation value will only be approved if it can be ascertained, by means of an Appropriate Assessment or other ecological assessment, that the integrity of these sites will not be adversely affected.</p>
ET 13-27 Carbon Emissions reduction	<p>a) To reduce carbon emissions in the county by achieving national, regional and any potential county targets to progress the national targets as set out in the Climate Action Plan (2021).</p> <p>b) To seek to reduce greenhouse gas emissions by promoting energy efficiency and the development of renewable energy sources utilising the natural resources of County Cork in an environmentally sustainable manner consistent with best practice and planning principles.</p>
<p>Project Response:</p> <p>The Proposed Development is in line with policy objectives relating to Energy and Telecommunications. The Proposed Development will facilitate the transition to green energy by facilitating the connection of the associated permitted wind farm to the national grid. This will aid County Cork's contribution to the national targets to reduce carbon emissions and greenhouse gas emissions as identified in the Development Plan, by promoting the development of renewable energy sources.</p> <p>Of particular note is objective ET 13-1 and 13-21, aimed at fulfilling the county's potential in terms of renewable energy and supporting/facilitating the provision of new grid infrastructure subject to the proper planning considerations and connection of renewable energy developments to the grid. The Proposed Development, which seeks to obtain permission for a 33kV CNR, 110kV GCR, and 110kV Substation (the latter of which is to remain in situ following the decommissioning) to facilitate the connection of the consented Coom Green Energy Park to the national grid, directly aligns with both of these policy objectives by connecting a permitted renewable energy development to the grid, ensuring that the county's potential is achieved and delivering new grid infrastructure (should the development be permitted).</p> <p>In conclusion, in accordance with the policy objectives outlined above, the Proposed Development is consistent with local planning policy related to energy and telecommunications and should be supported as it will deliver new grid infrastructure and facilitates the connection of the permitted Coom Green Energy Park to the national grid. This will in turn contribute significantly towards national climate obligations, reducing carbon emissions and transitioning towards a low carbon economy.</p>	



Policy	Description
Chapter 15 - Biodiversity and Environment	
BE 15-6 Biodiversity and New Development	<p>Provide for the protection and enhancement of biodiversity in the development management process and when licensing or permitting other activities by:</p> <ul style="list-style-type: none"> a) Providing ongoing support and guidance to developers on incorporating biodiversity considerations into new development through preplanning communications and the Council’s guidance document ‘Biodiversity and the Planning Process – guidance for developments on the management of biodiversity issues during the planning process’ and any updated versions of this advice; b) Encouraging the retention and integration of existing trees, hedgerows and other features of high natural value within new developments; c) Requiring the incorporation of primarily native tree and other plant species, particularly pollinator friendly species in the landscaping of new developments; d) Fulfilling Appropriate Assessment and Environmental Impact Assessment obligations and carrying out Ecological Impact Assessment in relation to development and activities, as appropriate; e) Ensuring that an appropriate level of assessment is completed in relation to wetland habitats subject to proposals which would involve drainage or reclamation. This includes lakes and ponds, watercourses, springs and swamps, marshes, heath, peatlands, some woodlands as well as some coastal and marine habitats; f) Ensuring that the implementation of appropriate mitigation (including habitat enhancement, new planting or other habitat creation initiatives) is incorporated into new development, where the implementation of such development would result in unavoidable impacts on biodiversity - supporting the principle of biodiversity net gain
<p>Project Response:</p> <p>As part of the Application for the Proposed Development, an Environmental Impact Assessment Report (this document) and an NIS have been prepared. Furthermore, the Applicant has adopted a 'mitigation by avoidance' approach from the outset whereby any sensitivities identified within the redline boundary have been avoided entirely where possible and the design is in line with the relevant best-practice guidelines. As such, this is in line with policy objectives relating to Biodiversity and Environment, as outlined above.</p>	
Chapter 17 - Climate Action	
CA 17-1	<p>Support national and local climate change objectives set out in the following:</p> <ul style="list-style-type: none"> • National Planning Framework • Southern Region Spatial and Economic Strategy • Climate Action Plan (2021 or any successor plan). • National Climate Change Adaptation Framework (2018 or any successor framework). • National Mitigation Plan (2017 or any successor plan). • Cork County Council Climate Change Adaptation Strategy.



Policy	Description
Chapter 17 - Climate Action	
CA 17-2	<p>In order to achieve a reduction in greenhouse gas emissions, an increase in renewable energy production, an increase in energy efficiency and enhanced biodiversity, support the transition to a low carbon, competitive, climate resilient and environmentally sustainable economy by 2050 through implementation of the polices of this plan that seek to deliver the following:</p> <ul style="list-style-type: none"> • compact growth, • integrated land use and transport, • sustainable transport choices, • liveable settlements, • renewable energy production and reduced energy consumption, • enhanced ecological biodiversity and • climate adapation measures such as through flood risk management, sustainable urban drainage systems and high quality placemaking and design.
<p>Project Response:</p> <p>As outlined throughout this chapter of the EIAR, the Proposed Development is supportive and compliant with all international, national, regional and local policy. It seeks to connect a permitted renewable energy development to the national grid which will subsequently increase renewable energy production and energy efficiency and help achieving the appropriate targets. The 110kV Substation element and adjacent permitted BESS will serve to improve the overall efficiency and durability of the local grid infrastructure.</p>	



Cork County Development Plan (2022-2028) Chapter 13 'Energy and Telecommunications' has accordingly divided the county into three different policy areas for the development of wind farms based on an assessment of viability against other considerations; "Acceptable in principle", "Open for Consideration" and "Not normally permissible". The Proposed Development is located within the areas designated as 'Open for Consideration' in County Cork's Wind Strategy Areas, as shown in Figure 4.1 within Volume 4 of the EIAR.

All development proposals within Cork County Development Plan area will be evaluated against their compliance with standards and legal requirements as contained within the National Landscape Strategy for Ireland (2020-2025) and the Cork Landscape Character Assessment (LCA) as shown in Plate 4-2 below.

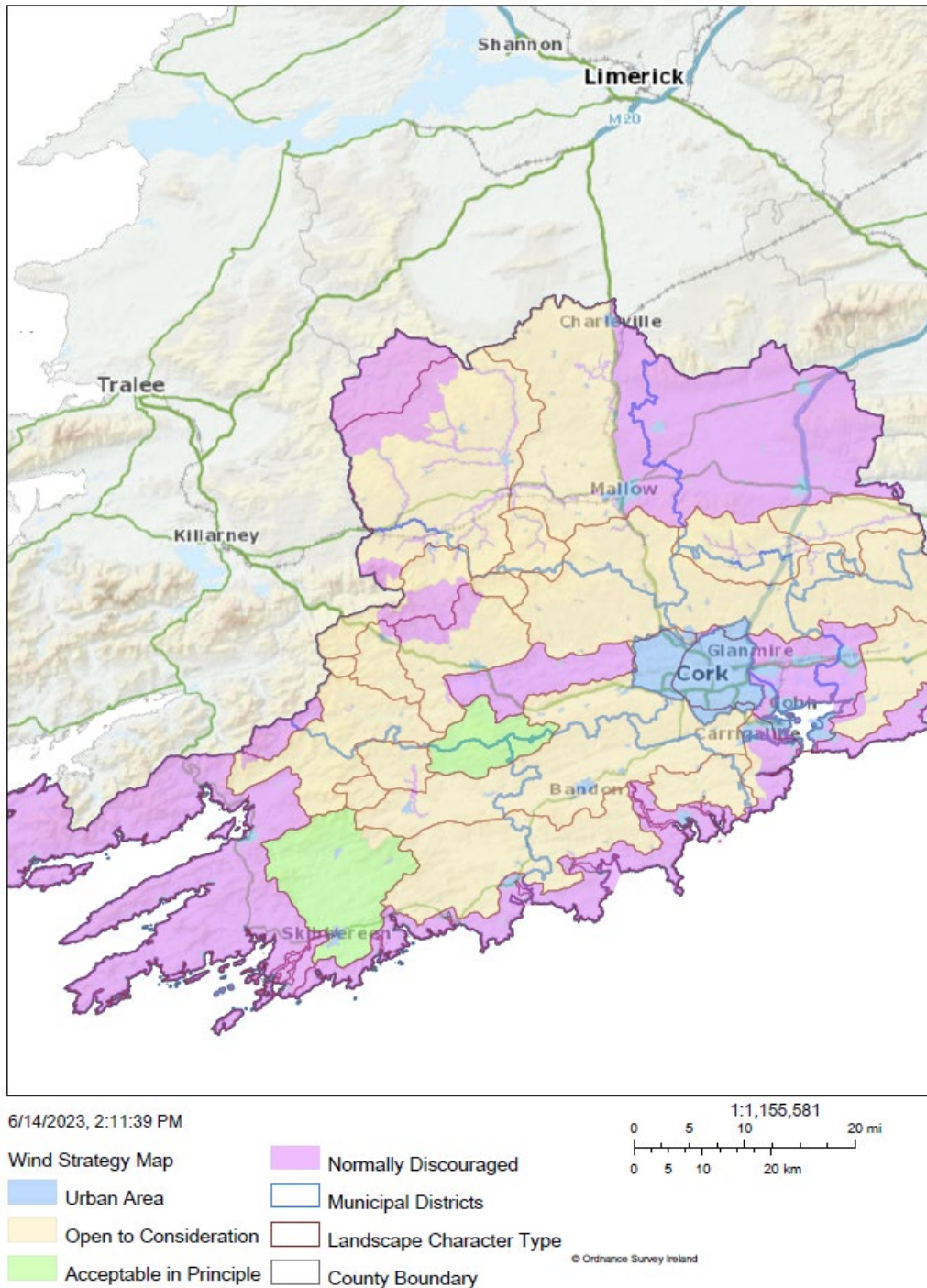


Plate 4-2: Wind Strategy Areas Cork County Development Plan



4.6.2 Cork Wind Energy Development Strategy

A 'Wind Energy Strategy' for Cork County Council was prepared in the context of EU and national renewable energy targets for the County Development Plan 2014. The purpose of that Wind Energy Strategy was to provide a strategic document which will underpin the Cork County Development Plan and Locals Area Plans and to inform their future view. The current iteration of the Wind Energy Strategy is still in operation today.

The Wind Energy Strategy examines the renewable energy potential of the county and considers the strategic planning factors contributing towards the deployment of such renewable energy. It also highlights the importance of integrating renewable energy and land use planning and identifies suitable locations for wind energy developments within the county.

The Wind Energy Strategy seeks to strengthen links between renewable energy and land use planning through County Development Plans, Strategic Development Zones and other local plans, with the Wind Energy Development Strategy forming as part of the County Development Plan.

In order to meet the required level of emissions reductions as set out in the Climate Action Plan, it is intended that by 2030 the country will increase the proportion of electricity consumption generated from renewable sources to 70%.

To provide a strategy that will maximise Cork County's Wind Energy potential, the key objectives of the Wind Energy Strategy were based on the following:

- The location of all existing and proposed wind energy developments and their cumulative impacts.
- The pattern of population distribution, so that the main centres of population can be avoided.
- Accessibility to the electricity distribution grid
- Important or high value landscapes.
- Nature conservations sites and in particular Natura 2000 sites (SPA and SAC).
- The Water Framework Directive and River Basin Management Plans for the County, so that impacts on the rivers, lakes and other waterbodies of the County could be avoided.
- The Sustainable Energy Ireland (SEI) Wind Atlas, 2003 was utilised to identify areas with viable wind speeds.

As adopted in the Development Plan, the best solution is the recognition of areas of highest viability. The Adopted Plan includes a Wind Energy Development strategy based on areas of highest viability, taking environmental sensitivities into account, but also designating some additional areas as unsuitable for wind energy developments on the basis of submissions made to the process. Overall, the adopted strategy contributes towards the protection of the environment and conforms to high level planning objectives while also promoting the development of wind energy and meeting national renewable energy targets. The approved Coom Green Energy Park and the Proposed Development are believed to be in line with the preferred strategy outcome.



4.6.3 Cork County Draft Landscape Strategy

As stated in the Cork County Draft Landscape Strategy (2007):

"This draft strategy aims to provide an explanation of Cork County's landscape by way of describing what the landscape actually entails, while highlighting how areas within the county have their own distinctiveness and character. It also aims to provide a better understanding and appreciation of the county's landscape and of the important."

The proposed wind farm development is located within the Landscape Character Type (LCT) *13b: Valleyed Marginal Middleground (Glenville and Environs)*, and specifically within this LCT the Proposed Development sits in the Landscape Character Area (LCA) *6. Glenville – Moorland, Forested Ridge and Marginal Mosaic Upper Valley*. LCT *13b: Valleyed Marginal Middleground* is identified as having Medium Landscape Value, and Medium Landscape Sensitivity. The Landscape Importance is listed as Local level.

An area of 'Medium' Landscape Value implies:

"Landscapes with positive characters and with local or county importance."

Whereas an area of 'Medium' Landscape sensitivity implies:

"can accommodate development pressure, but with limitations in the scale and magnitude of the development. In this rank of sensitivity the landscape can accept some changes while others are more vulnerable to change. If pressure exceeds the landscapes limitations the character of the landscape may change"

Thus, the proposed location of the site has the capacity to accommodate a wide range of uses without significant adverse effects on the appearance or character of the area.

4.6.3.1 Cork County Development Plan - Overview

In summary, as demonstrated above the Proposed Development is compliant with all appropriate local policies and will support the council in delivering the stated objectives.

4.6.4 Cork County Council Climate Action Plan 2024-2029

Ireland's Climate Action and Low Carbon Development (Amendment) Act (2021) requires local authorities to prepare a Local Authority Climate Action Plan (LACAP) to meet national emission reductions targets and develop resilience to the impacts of climate change. In line with this, Cork County Council Climate Action Plan 2024-2029 was adopted on the 12th of February 2024.

Cork County Council Climate Action Plan 2024-2029 is aligned with the Government's national climate objectives and targets, which seek to transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy by 2050. The Climate Action and Low Carbon Development (Amendment) Act 2021 frames Ireland's legally binding climate ambition to deliver a reduction in greenhouse gas emissions by 51% by 2030.



Cork County Council Climate Action Plan 2024-2029 sets out its Vision, Strategic Goals, Objectives and Actions to create a low carbon and climate resilient county, with the overarching aim to:

- Reduce its direct carbon emissions by 51% by 2030,
- Assist in the delivery of the climate neutrality objective at local and community levels; and
- Identify and support the development of a Decarbonising Zone (DZ) within the local authority area.

Key Goal 4.8.1 *Support the energy transition to a sustainable energy system* includes Objective 4.8.1.1 *Support the development of renewable energy infrastructure*, which is relevant to the Proposed Development, and is outlined below:

NO.	ACTION
4.8.1.1.2	Promote renewable energy generation, storage, and distribution infrastructure in accordance with the CDP within the county, whilst promoting the need to consider environmental protection requirements at the outset of and during such projects.

Within the Plan, Cork County Council recognises the importance of improved grid connection infrastructure and renewable energy generation across the county. As such, the Proposed Development is in line with the aims and objectives of the Cork County Council Climate Action Plan 2024-2029.



4.7 Conclusion

The policies, objectives and legislation as described throughout this chapter have set out all significant International, European, National, Regional and Local policy support for a move to renewable energy technologies and a reduction in greenhouse gas emissions. Ireland is committed to meeting International and European targets, and if these targets are not met, the government must purchase Carbon Credits to meet compliance with both emissions and renewable energy targets or face fines from the EU.

The SEAI report, National Energy Projections 2025, Energy in Ireland set out the latest National Energy Projections. The report states: *"it is no longer realistic to assume full achievement of many key Climate Action Plan targets by 2030. A transformative approach to delivering infrastructure is needed to recover a feasible path and mitigate future risk."* Further, it states: *"Even in a scenario where all delivery targets set out in the Climate Action Plan are fully achieved by 2030, Ireland is still projected to require more measures to meet its legally binding national and EU obligations. These must be combined with policy to meet a greater challenge by 2040."*

While Ireland has come a long way in increasing renewable energy generation, the targets are ever increasing from a European perspective. The 2050 European targets effectively mean that Europe's energy production will have to be almost carbon-free by 2050.

CAP24 and CAP25 sets out an objective to more than double Ireland's onshore wind energy capacity to 9 GW by 2030, in order to meet new renewable energy targets and reduce emissions. This remains the target under CAP25. There is a clear national mandate to accommodate significant onshore wind within the next decade. Furthermore, the Revised National Planning Framework, places greater emphasis on a move to a low-carbon economy to reduce Ireland's carbon footprint by integrating climate action into the planning system in support of national targets.

It is this commitment on energy and climate policy that justifies a clear need for renewable energy generation and supporting infrastructure in Ireland. It is recognised that there are a range of renewable resources alternatives that could be explored to meet our International and European commitments, however onshore wind, which the Proposed Development is supporting, is recognised as being a key to achieving this as emphasised in the Climate Action Plan 2025 (CAP25).

The Regional Spatial and Economic Strategy (RSES) for the Southern Regional Assembly supports the increased use of renewable energy sources to transition the Region to a low carbon, climate resilient and environmentally sustainable economy to mitigate against climate change.

National and Regional Energy Policies and Objectives have been reinforced through the Cork County Council Development Plan 2022-2028, including the appended Wind Energy Strategy's for each administrative boundary. The approved Coom Green Energy Park forms a vital part of the region's increase in renewable energy generation, which will be supported by the grid connection and proposed substation within the Proposed Development.

In consideration of the reasons and analysis as set out in this chapter of the EIAR, it is our professional opinion that the Proposed Development adheres to all relevant planning policies, and therefore, is favourable from a national and local policy perspective, particularly in relation to the National Planning Framework (NPF), The Climate Action Plan 2024 & 2025 (CAP24 & CAP25), and The Climate Action and Low Carbon Development (Amendment) Act 2021 (the "Climate Act"). The Project will contribute significantly to the ambitious targets set out in the policies as described within this chapter and enhance and expand upon the existing mix of renewables in Ireland's electricity network and national grid.



There is a clear need for renewable energy generation in Ireland, and onshore wind such as that facilitated by the Proposed Development is recognised as being a key to achieving this, and we consider the Proposed Development to be consistent with International, National and Regional energy policies, as well as the county policies as contained within the County Cork Development Plan 2022 - 2028.



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