TOBIN

Lissinagroagh Wind Farm
Planning Statement

Ireland FuturEnergy

BUILT ON KNOWLEDGE

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1. INTRODUCTION

This Planning Statement has been prepared by TOBIN on behalf of FuturEnergy Lissinagroagh DAC (the Applicant) to accompany a planning application for the proposed Lissinagroagh Wind Farm, (hereafter referred to as the "proposed development"), which is located in Leitrim County.

This report considers the proposed development in terms of legislative context and in relation to International, EU, National, Regional and Local Planning policies and objectives, to demonstrate that the proposed development is consistent with the relevant legislation and with the proper planning and sustainable development of the area.

The proposed development will include fourteen (14) wind turbines and all associated infrastructure including turbine foundations, hardstanding areas, borrow pits, access roads, and other ancillary infrastructure.

The proposed development including the turbine delivery route, lies within the functional areas of Leitrim, Sligo and Donegal County Councils and the proposed development is thus informed by the provisions of the Leitrim County Development Plan 2023-2029, Sligo County Development Plan 2024-2030, and Donegal County Development Plan 2024-2030.

The relevant global, European, national and regional climate, energy and planning policies as set out in this report emphasise the need to generate renewable energy and the importance of moving towards decarbonising the economy.

The proposed development will contribute significantly to Ireland's transition away from imported fossil fuels. In 2024, fossil fuels accounted for over 80% of Ireland's energy supply, with oil alone comprising nearly half.

The proposed development has the potential to produce up to between 222,591 and 291,393 MWh (Megawatt hours), equivalent to the annual electricity use of between 52,998 and 69,379 Irish households, which will increase the share of domestically produced renewable energy and reduce reliance on carbon-intensive imports.

The proposed development, with its installed capacity of between 77 MW and 100.8 MW, directly supports this goal. Wind energy already accounts for over 33% of Ireland's electricity supply and has driven significant emissions reductions. This proposed development will accelerate progress toward national and EU climate targets.

This report will showcase how the proposed development will contribute towards meeting Ireland's binding targets as well as national, regional, and local policies.

1.1 Statement of Authority

This report has been prepared having regard to applicable local, regional, and national planning and environmental policy frameworks. It draws upon current government strategies, including the Programme for Government 2025, the Climate Action Plans (CAP24 and CAP25), and the European Green Deal and Fit for 55 legislative package. It is based on the most up-to-date policy documents at the time of preparation of this report. The report has been compiled by Saoirse Burke, Graduate Planner (BSc in Human Geography and Urban and Regional), Eirene Varghese, Planner (Bachelor's in Architecture, and Masters in Regional and Urban Planning) with over 4 years of experience in environmental planning, renewable energy policy, and statutory compliance, and Louise Byrne, Lead Planner (BA (International) in Geography and Masters in Regional and Urban Planning). Louise has over 11 years experience working as a professional planner, working in Local Government and private consultancy roles in both Ireland and the UK.

2. PROJECT DESCRIPTION

This section of the report will describe the proposed development as set out in the public notices, its location, site history.

2.1 PROPOSED DEVELOPMENT

The proposed development comprises:

Proposed Wind Farm

- Fourteen (14) wind turbines with a blade tip height range of 180 m to 185 m inclusive, a rotor diameter range from 149 m to 163 m inclusive, a hub height range from 101 m to 110.5 m inclusive, a minimum ground clearance of 22 m, and all associated foundations, hardstanding and assembly areas;
- A permanent meteorological mast with a height of 100 m, with a lightning finial extending above the mast;
- Modifications to an existing site access on the L61801 local road in the townland of Faughary in the west of the site, to be used as a permanent access during construction and operation;
- A new temporary access on the L6184 local road in the townland of Cherrybrook for use by turbine delivery vehicles during construction only, and subsequent reinstatement;
- Modifications to an existing site access on the L61844 local road in the townland of Lissinagroagh in the southeast of the site, to be used as a temporary access during construction phase only;
- Approximately 7.95 km of new internal access tracks to include passing bays and associated drainage;
- Upgrade of approximately 8.35 km of existing access tracks, to include passing bays and associated drainage;
- Temporary and permanent drainage and sediment control systems;
- Ten (10) clear span bridges and one (1) existing culvert extension at watercourse crossings by access tracks;
- Three (3) borrow pits with a total available area of 63,352 m2 for temporary use during construction. The borrow pits will subsequently be used for storage of excavated material;
- Two (2) temporary construction compounds each on an area of 9,100 m2 to contain site offices, storage containers, bunded fuel storage, waste storage, parking areas and security fencing;
- Seven (7) permanent controlled access points on the L61801 and L6184 Local Roads in the townlands of Faughary and Boleyboy to facilitate turbine delivery and construction works which will remain in place after the construction period;
- A temporary crossing of unnamed local road in the townland of Cherrybrook to facilitate turbine delivery vehicles during construction only;

- All associated underground electrical and communications cabling connecting the wind turbines to the on-site substation (the substation is subject to a separate planning application, see details below);
- All related site works and ancillary development including landscaping and soil excavation;
- Biodiversity enhancement areas (218.5 ha) to provide nesting and foraging habitat for birds and other land improvements; and
- Ancillary forestry felling to facilitate construction and operation of the proposed project.

A separate application to obtain approval for a proposed grid connection and substation will be submitted to An Coimisiún Pleanála. This application, and the proposed grid connection application are functionally interdependent and constitute a single project. The proposed grid connection application will seek approval for a 110kV substation and grid connection within the townlands of Curraghfore, Skreeny, Faughary, Amorset, Clooneen, Milltown, Cornastauk, Srabrick, Cloonaquin, Carrigeencor, Boihy, Aghameelta, Kilcoosy, Corrudda, Cleen, Tully, Killeen, Killanummery, Cleighran, Fawn, Drumahaire, Drumlease, and Carrowcrin Co. Leitrim and Lavally, Drumee, and Ballysumaghan, Co. Sligo.

A Turbine Delivery Route (TDR) along which temporary accommodations may be required are considered in the accompanying EIAR and NIS, and these accommodations are located at the following townlands: Cherrybrook, Cornastauk, Diffreen, Donagh Beg, Donagh More, Knocknaclassagh, Manorhamilton, Moneenshinnagh, Lugnafaughery, Sracreeghan and Meenaphuill (County Leitrim), Barroe, Ballytivnan, Cartron, Cloontyprocklis, Doonally, Drumcliff South, Drumkilsellagh, Grange, Rathquarter, Tully, Willowbrook (County Sligo), and Aighan, Aghayeevoge, Ballymagowan, Beaugreen Glebe, Bruckless, Cashelreagh Glebe, Clarcarricknagun, Coolcholly, Darney, Doonan, Drumlonagher, Dunkineely, Finner, Killybegs, Magheracar, Mullans, Tullyearl, Tullygallan (County Donegal).

A ten-year planning permission is being sought. Given the recent advances in turbine technology, and the anticipated lifespan of wind turbines, 35 years is considered to be the optimal operational life for the proposed development from the commencement of operations.

A detailed description of the proposed development is set out in Chapter 2 of the submitted EIAR.

2.2 Site and Location

2.2.1 Proposed Wind Farm Site

The proposed wind farm site is located within the townlands of Boleyboy, Cashelaveela, Cherrybrook, Coolodonnell, Faughary, Killea, Lissinagroagh, Lisdarush, Lugasnaghta, Raheelin, Shasmore, Tawnyfeacle, and Tullyskeherny, Co. Leitrim. The closest turbine is located approximately 3 km northeast of Manorhamilton and approximately 4 km southwest of Kiltyclogher. The proposed biodiversity enhancement lands are located to the north and south of the wind farm in the townlands of Raheelin, Killea, Lugnasaghta, Cooloodonnell and Tullyskeherney and Cashelaveela.

The proposed landholding within which the wind farm is located extends to approximately 1,096 ha, of which 785 ha are currently commercial forest owned by Coillte. The remaining

311 ha are largely privately-owned third-party lands and comprise a mix of coniferous forestry, marginal agricultural land, peatbogs and transitional scrub. The planning application site boundary extends to 389 ha (Refer to Drawing 10955-2001).

The site is located in close proximity to the Northern Ireland border in County Fermanagh which is approximately 3 km to the north. The site ranges in elevation from 170 to 380 m AOD, with the eastern part of the site bordering Dough Mountain (462m).

The land use/activities within the site are primarily commercial forestry, with expanses of wet grassland in the centre, northwest and southeast and upland blanket bog/open peatland particularly in the north and northwest. Site investigations undertaken within the proposed wind farm site indicate that peat depths vary from 0.1 m to 4.5 m in the north and 0.1 m to 1.8 m in the south.

There are a number of watercourses within the site. These range from naturally occurring upland streams to modified drainage channels within forested areas at mid to lower elevations. The southeastern part of the site is characterised by a number of flashy watercourses in deep ravines, the majority of which have existing crossings in place as part of existing forest road network.

The site is located within the Killarga South Groundwater Body (GWB). The aquifers underlying the site are classified as Locally Important in the west to Regionally Important – Karstified further east and southeast. Groundwater vulnerability ranges from Low in the west of the site to Moderate and High moving eastward, with areas of Extreme vulnerability to the north and west around Saddle Hill and south of Dough Mountain.

Coillte forestry within the site comprises different stages of coniferous plantation forestry including recent clear-fell, second rotation, immature, semi-mature and mature forestry.

The site can be accessed from the southeast via the L61844 Local Road diverging from the L6184 off the N16 National Road east of Manorhamilton and from the west via the L61801 diverging from the R282 Regional Road. The local roads are linked to a network of existing Coillte forestry tracks, which provide good coverage, are well maintained and in good condition.

In general terms, the area surrounding the proposed wind farm site can be described as rural with a dispersed settlement type. There are no residential dwellings within 740m (four times the maximum proposed tip height) of a proposed turbine. Residential dwellings are broadly aligned with the local road network in the area surrounding the site and, for the most part, the site is relatively remote from settlement.

There is one operational wind farm located west of the proposed wind farm site, namely Faughary Wind Farm, comprising three turbines, 119 m in height. There are two further wind farms within 10km, namely Carrickeeny Wind Farm (4 turbines) located approximately 8km to the west and Tullynamoyle (19 turbines) located approximately 10 km to the south. Other operating wind farms at a greater distance from the site include Garvagh Glebe (13 turbines) and Moneenatieve (5 turbines) located 18-20 km to the south. Tullynahaw (11 turbines) and Altagowlan (9 turbines) are located further south in north Co. Roscommon close to the border with Co. Leitrim. Acres Wind Farm (6 turbines) is located approximately 22 km to the north in Co. Donegal. The proposed Croagh Wind Farm (10 turbines) is located approximately 17km to the southwest and Tullynamoyle New (4 turbines) adjacent to the operational Tullynamoyle Wind Farm.

2.2.2 Turbine Delivery Route

The proposed TDR commences at the port of entry in Killybegs Co Donegal and extends southeast around Donegal Town before travelling southwest towards Sligo town before approaching Manorhamilton and the proposed Wind Farm site from the south. The total length of the route is 122 km.

Minor accommodations are potentially required at fifty-seven (57) locations along the 122-km route to facilitate the delivery of oversize turbine components to the site. Further details are provided in Appendix 2-1 TDR Drawings and Report, of the submitted EIAR. These include temporary vegetation management, local strengthening of road edges and street furniture management to facilitate the transport of oversize turbine components to the wind farm site and subsequent reinstatement.

These accommodations are located within the following townlands: Cherrybrook, Cornastauk, Diffreen, Donagh Beg, Donagh More, Knocknaclassagh, Manorhamilton, Moneenshinnagh, Lugnafaughery, Sracreeghan and Meenaphuill (County Leitrim), Barroe, Ballytivnan, Cartron, Cloontyprocklis, Doonally, Drumcliff South, Drumkilsellagh, Grange, Rathquarter, Tully, Willowbrook (County Sligo), and Aighan, Aghayeevoge, Ballymagowan, Beaugreen Glebe, Bruckless, Cashelreagh Glebe, Clarcarricknagun, Coolcholly, Darney, Doonan, Drumlonagher, Dunkineely, Finner, Killybegs, Magheracar, Mullans, Tullyearl, Tullygallan (County Donegal).

2.2.3 Grid Connection Route

The GCR extends from the proposed substation (subject to a separate planning application) southwest along the public road network for approximately 32km to the existing ESBN 110/220kV Srananagh substation in Co. Sligo.

It extends through the following townlands: Curraghfore, Skreeny, Faughary, Amorset, Clooneen, Milltown, Cornastauk, Srabrick, Cloonaquin, Carrigeencor, Boihy, Aghameelta, Kilcoosy, Corrudda, Cleen, Tully, Killeen, Killanummery, Cleighran, Fawn, Drumahaire, Drumlease, and Carrowcrin Co. Leitrim and Lavally, Drumee, and Ballysumaghan, Co. Sligo.

The proposed GCR utilises the existing public road network where possible prioritising the use of Local and Regional roads to reduce likely significant effects. There are two (2) bridge locations (referred to as Bridge 3 and Bridge 8 on Drawing 05773-DR-152 and 159) where the cable will extend offroad onto private lands to facilitate Horizontal Directional Drilling (HDD) beneath the River Bonet. The private lands are generally pastoral agriculture. Further details are provided in Appendix 2-2 - Substation and Grid Connection Design Drawings, Appendix 2-3 - Substation & Grid Connection Construction Methodology and Section 2.5.7, of the submitted EIAR.

2.3 Site Planning History

A review of historic planning applications within the windfarm site boundary was conducted using the Leitrim Planning search portal website and An Coimisiún Pleanála (ACP) planning search portal. The following permissions were found:

Application Reference No.	Project Description	Development Address	Grant Date
19270	for a new forest road entrance and erection of a new security barrier together with all ancillary site services and associated site works	Lissinagroagh, Manorhamilton, Co Leitrim	06/03/2020

In addition to the permitted development outlined above there is a history of withdrawn applications within the windfarm site boundary. These are outlined below for clarity:

Application Reference No.	Project Description	Development Address	Withdrawn Date
18253	a new forest road entrance and erection of a new security barrier together with all ancillary site services and associated site works	Faughary, Manorhamilton, Co. Leitrim	25/07/2019
18262	new forest road entrance and erection of a new security barrier together with all ancillary site services and associated site works	(Site No. 1), Boleyboy, Manorhamilton	27/08/2019
18263	new forest road entrance and erection a new security barrier together with all ancillary site services and associated site works	(Site No. 2), Boleyboy, Manorhamilton	27/08/2019
21110	will consist of the erection of a 100m meteorological mast that will be fixed to the ground by guy wires, together will all ancillary site works for a period up to 2 years for the purpose of measuring local climate conditions and collecting meteorological data	Boleyboy, Co Leitrim	21/04/2022

2.4 Planning Legislation

The Seventh Schedule of the Planning and Development Act 2000 (as amended) sets out classes of development that constitute Strategic Infrastructure Development (SID) under Section 37A of that Act. Class 1 of the 7th Schedule includes the following:

"An installation for the harnessing of wind power for energy production (a wind farm) with more than 25 turbines or having a total output greater than 50 megawatts".

The proposed wind farm will consist of fourteen (14) turbines and have an output of above 50 Megawatts and as such constitutes SID under the meaning of the legislation. Consultations were held with An Coimisiún Pleanála under Section 37B of the Planning and Development Act 2000 (as amended). ACP has confirmed that the proposed development falls within the

scope of paragraphs 37A(2)(a), (b) and (c) of the Act. Accordingly, it has been confirmed that the proposed wind farm would be strategic infrastructure within the meaning of Section 37A of the Planning and Development Act, 2000 (as amended), and that any application for permission must therefore be made directly to ACP. A copy of this correspondence is included in Appendix 1-3 of the submitted EIAR.

During pre-application consultation with ACP, the following topics were raised:

Table 2-1: Queries discussed during application pre-consultation with ACP

Topic raised	Response
Biodiversity: - Emphasis placed on biodiversity enhancement measures - Good to see ratio presented - Right compensation in the right place	No specific biodiversity enhancement measures are listed within the Biodiversity Chapter. Compensation Measures are listed in Section 5.7 The Outline Biodiversity Management Plan (OBMP) contains the full details on the compensation measures see Appendix 6-3 Outline Biodiversity Management Plan The chapter does not list the ratio of habitat lost to restored as farm plans are pending, but there is potential to reach a ratio of 1:5 lost to restored for peatland habitats through compensation measures, specifically drain blocking as prescribed under the OBMP measures for Hen Harrier. Based on our surveys to date and knowledge of the site we do not expect any derogation licenses are required.
Ornithology: - National importance of pairs of hen harrier found on site - Importance for assessments to be considered with no reasonable scientific doubt - Engagement with NPWS - Examples requested of mitigation that has shown to be effective	- see Section 6.3.4 of Chapter 6 Ornithology in the submitted EIAR where importance of pairs of hen harrier is assessed. - see Section 6.4.4 and 6.4.5 for the impact assessment. - see Section 6.22 where our responses to NPWS's comments are discussed. - given in OBMP Appendix 6-13
Hydrology & Hydrogeology: - Worked examples of drainage proposed around turbine bases from felling stage to construction dealing with surface water and any contaminated water - interaction between ground water and peat needs to play into this assessment particular with regard to stability - need to demonstrate that ground water has been looked at very carefully - Karst protocol for construction	Drainage around turbine bases: Surface water and any contaminated runoff are managed using settlement ponds, silt traps, swales, check dams and lined infiltration/attenuation basins, with all turbine base excavation water routed to treatment ponds before controlled discharge. Groundwater–peat interaction & stability: Detailed groundwater monitoring (BH/GW boreholes), peat-depth investigations, and recharge/vulnerability mapping were completed, showing perched water tables in deep peat and higher-permeability bedrock zones; turbine and road layouts were adjusted to avoid instability risks. Karst protocol: 76 karst features (dolines, swallow holes) were mapped, with construction

	buffers (≥30 m for dolines, ≥100 m for swallow holes), hydrogeologist supervision, and measures such as geotextile layers or grouting if voids are encountered.
Peat Stability - highly susceptible to peat and landslides, to make sure that this is considered - a rationale must be clearly set out why divergence - historical landslides, recorded by GSI, so again to ensure if any investigation of this, that it is fully explored. Particularly area near T5. - Look at 2024 document on peatland failures and contributing factors	The EIAR confirms that the central and northern portions of the site are mapped by GSI as Moderate–High landslide susceptibility, with turbines T3, T4, T5, T7 and T8 specifically falling within Low to Moderately High risk zones. A full Peat Stability Risk Assessment (PSRA) was completed, including 433 peat probes, geophysics, trial pits and rotary drilling, concluding ODF ≥ 1.0 (i.e., acceptable stability) the assessment demonstrates that peat/landslide risks have been systematically evaluated. The GSI's national susceptibility mapping is "high-level" only, and detailed site-specific investigations provide a more robust and reliable basis for design.
Noise - Plan to be included to deal with noise occurrence	A noise management protocol is attached as Appendix 9-10 of the EIAR. This outlines the steps that will be taken should there be concerns or complaints regarding noise levels produced by the windfarm. The operator will investigate complaints in collaboration with the turbine manufacturer. The noise complaints management protocol provides an outline methodology that will be applied to noise complaint investigations

A design flexibility consultation was held with ACP on the 27th January 2026 for turbine dimensions to have a maximum blade tip height range from 180 m to 185 m inclusive, a rotor diameter range from 149 m to 163 m inclusive, and a hub height range from 101 m to 110.5 m inclusive. A formal Design Flexibility Opinion issued thereafter under Ref. ABP-323910-25. Under Section 37CD of the Planning and Development Act, 2000, as amended, the Commission agreed that the details of the design flexibility consultation, namely the turbine height, rotor diameter and hub height, may be confirmed after the proposed application has been made and decided.

A planning application for the 110kV substation and the grid connection will be submitted as a separate application to ACP under Section 182A of the Planning and Development Act 2000, as amended.

Figure 2-1: Site Location Plan

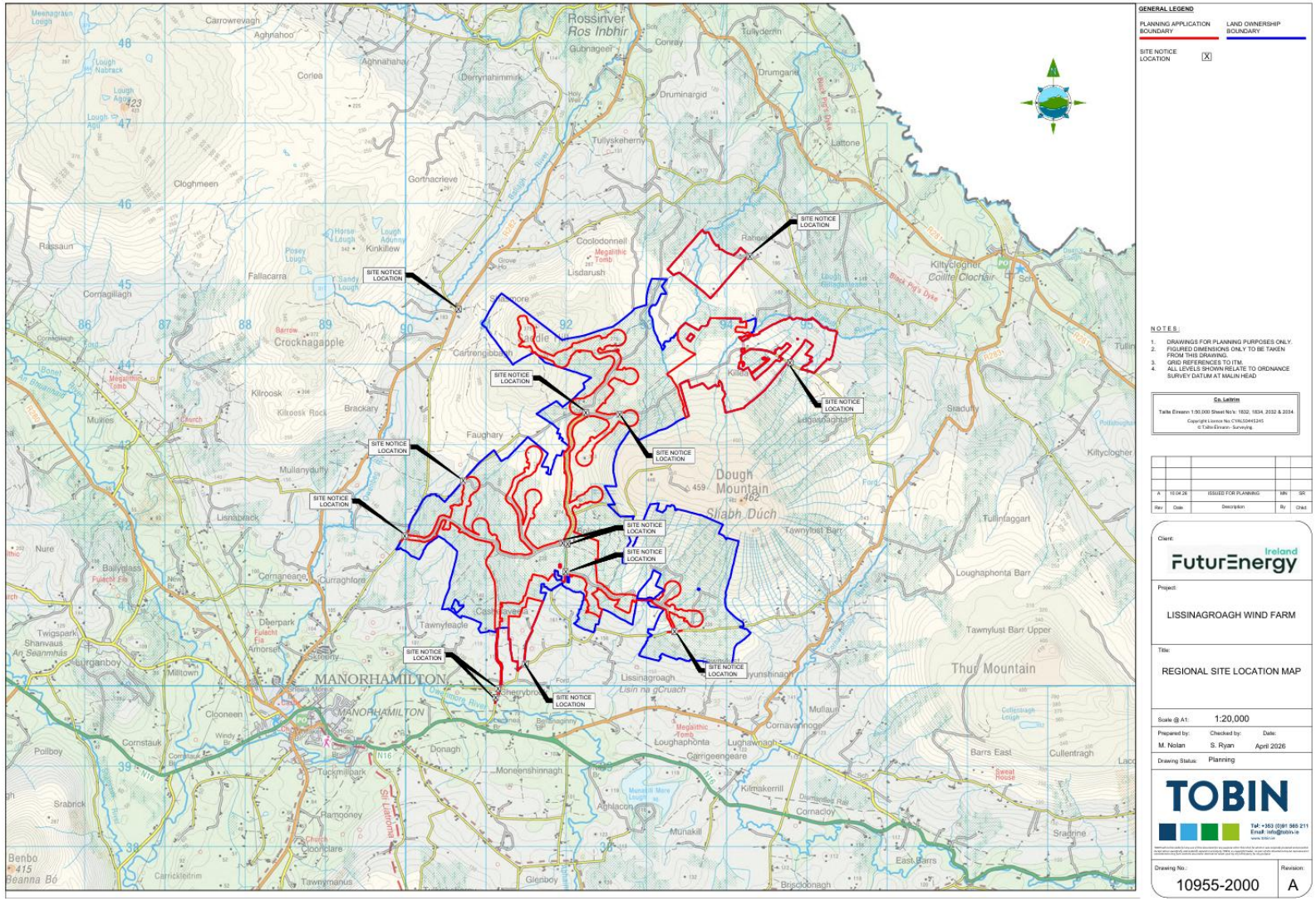
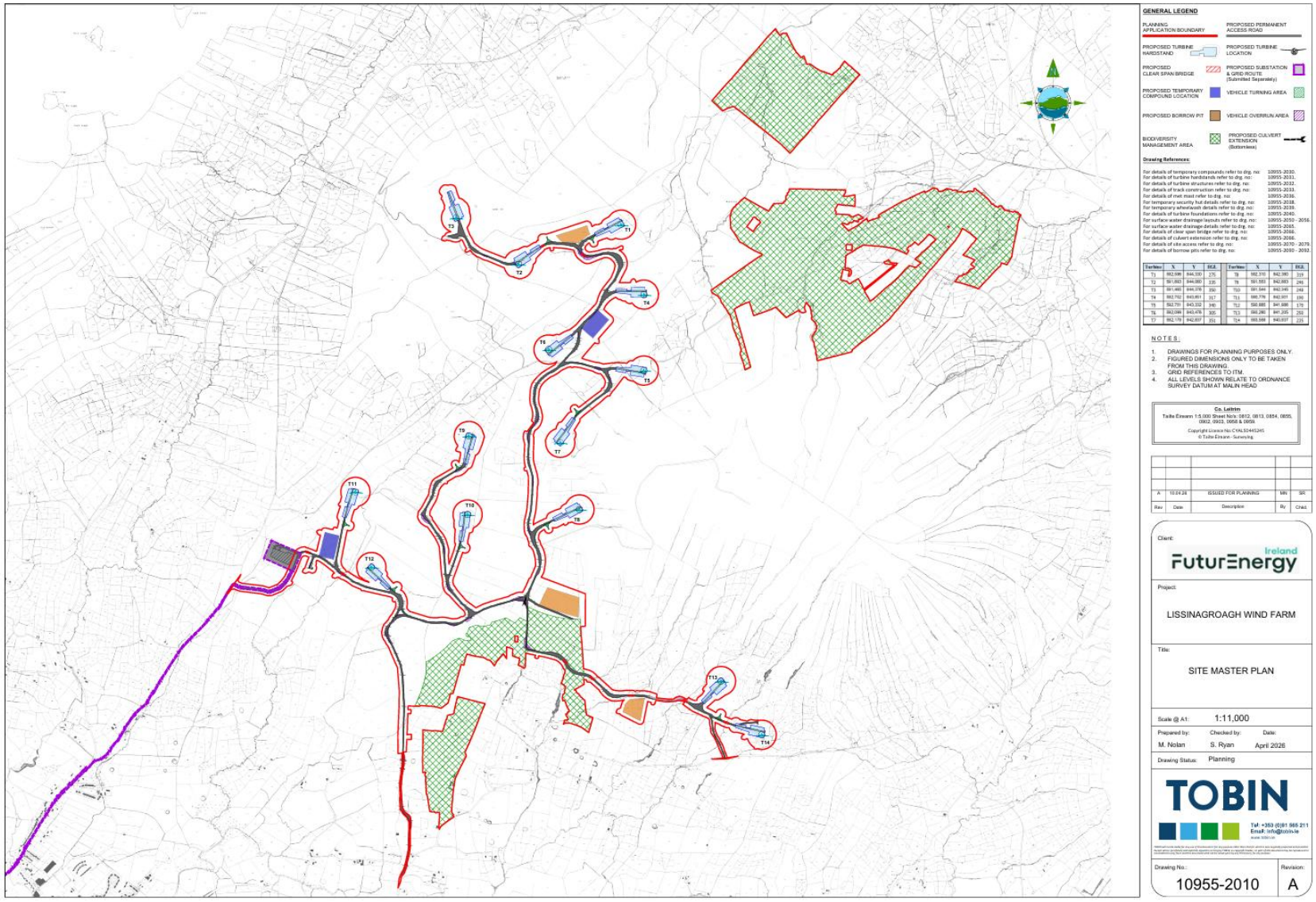


Figure 2-2: Site Layout Plan



3. PLANNING AND DEVELOPMENT LEGAL AND POLICY CONTEXT

It's important to place the proposed development within an international, EU, national, regional and local policy context. This section provides a summary of this, as well as a summary of the legislative mechanisms, which support the generation of energy from renewable sources, reduce fossil fuel dependency and support national energy security.

3.1 INTERNATIONAL AND EUROPEAN LEGISLATION AND POLICY

This section provides a concise overview of the principal international and European legislative and policy instruments underpinning the legal and strategic framework for climate change mitigation and greenhouse gas emissions reduction.

3.1.1 Key Historic Legal Instruments

1992 United Nations Framework Convention on Climate Change:

Negotiated at the United Nations Conference on Environment and Development in Rio de Janeiro in 1992, the UNFCCC established the framework for international action on climate change. Initially ratified by fifty countries, this international treaty seeks to limit average global temperature increases and address the effects of climate change already considered inevitable. It recognises the climate system as a shared resource affected by emissions of carbon dioxide and other greenhouse gases. It provided the legal basis for later Protocols and Agreements, and now has near-universal membership with 197 Parties.

Kyoto Protocol Targets:
The Kyoto Protocol, which extends the 1992 UNFCCC, entered into force in 2005 and made emissions reduction targets for developed countries, including Ireland, legally binding. Under the first commitment period, the EU agreed to reduce greenhouse gas emissions by 8% below 1990 levels during 2008–2012, while Ireland committed to limiting its emissions to no more than 13% above 1990 levels over the same period.

Doha Amendment to Kyoto Protocol:

Adopted on 8 December 2012, the Doha Amendment established a second commitment period under the Kyoto Protocol from 1 January 2013 to 31 December 2020, revised the list of greenhouse gases to be reported, and updated provisions relating to the first commitment period. The Doha Amendment remains the only formal amendment to the Kyoto Protocol since 2012. Under the protocol, countries must meet their targets primarily through national measures, although market-based mechanisms (such as international emissions trading) can also be utilised.

3.1.2 Key Policy

Energy Roadmap 2050:
Published by the European Commission in December 2011, the Energy Roadmap 2050 set out the EU's long-term strategy for achieving a competitive, secure and sustainable energy system while reducing greenhouse gas emissions by 80–95% by 2050 relative to 1990 levels. The revised Renewable Energy Directive, adopted in 2023, set a binding 2030 target of at least 42.5% renewable energy, and in July 2025 the European Commission proposed

an amendment to the Climate Law to establish a binding 2040 target of a 90% net emissions reduction compared with 1990 levels.

3.1.3 Current Legal Instruments

The Paris Agreement 2015:
The Paris Agreement seeks to address greenhouse gas emissions mitigation, adaptation and finance from 2020 onwards. It aims to keep the global average temperature rise to below 2°C above pre-industrial levels and to pursue efforts to limit the increase to 1.5°C. Ireland is legally bound under Article 7 of the COP21 Paris Agreement, signed in 2015, to prepare and submit periodic updates on its national adaptation and mitigation plans. The Conference of the Parties (COP) is held annually to agree policies on limiting temperature rise and adapting to climate change impacts. COP30 was held in 2025, where Parties adopted the Belém Package, which focused on implementation of the Paris Agreement.

3.1.4 Current Policy

Europe 2030 Climate and Energy Framework:

EU leaders agreed in 2014 on new climate and energy objectives for 2030 following a proposal put forward by the European Commission. The 2030 framework aims to make the EU's economy and energy system more competitive, secure and sustainable. A centrepiece of the 2030 framework is the binding domestic target to reduce greenhouse gas emissions by at least 55% below 1990 levels by 2030. EU leaders agreed in 2023 to set a target of 42.5% of energy from renewables at EU level, as has been formally adopted in the Renewable Energy Directive (recast). This amended target is a clear indication that increased renewable energy remains at the forefront of both EU and national energy policy.

The European Green Deal 2019:

The European Green Deal 2019 reset the European Commission's commitment to tackling climate and environmental-related challenges. It is a growth strategy that aims to transform the EU into a fair and prosperous society, 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. Early climate initiatives under the Green Deal included the European Climate Law, to enshrine the 2050 climate-neutrality objective in EU law. In 2021, the European Commission launched the first tranche of its 'Fit for 55' measures that will support Europe's climate policy framework and put the EU on track for a 55% reduction in carbon emissions by 2030, and net-zero emissions by 2050. This proposal was further updated in 2022 as part of the REPowerEU Plan, which aims to significantly increase mandatory targets for renewable energy in the EU to 42.5%, to make the EU independent from Russian fossil fuel consumption. It is a policy of the EU to phase out Russian fossil fuels by increasing the availability of renewable energy from within the EU.

3.1.5 Conclusion of International Legislation and Policy

Taken together, these above demonstrate strong and increasing policy support at EU level for the accelerated delivery of renewable energy, driven by sustainability, energy security and competitiveness objectives.

3.2 National Legislation and Policy

This section provides an overview of national climate legislation and planning policy applicable to the proposed development. It sets out the statutory framework underpinning Ireland's climate action, emissions reduction and renewable energy objectives. It also establishes the national context for the assessment of the proposed development.

3.2.1 National Legislation

3.2.1.1 Climate Action and Low Carbon Development Act 2015, as amended

The purpose of the Climate Action and Low Carbon Development Act 2015, as amended is to provide for the approval of plans '*for the purpose of pursuing the transition to a climate resilient and climate neutral economy by the end of the year 2050*'. The Act also '*provides for carbon budgets and a decarbonisation target range for certain sectors of the economy*'. The amended Act removes any reference to a national mitigation plan and instead refers to both the Climate Action Plan, and a series of National Long Term Climate Action Strategies.

In addition, local authorities shall prepare a 'local authority climate action plan' lasting five years which specifies the mitigation measures and the adaptation measures to be adopted by each local authority. This represents a mandate for Local Authorities to adapt to climate change.

The Act has set a target of a 51% reduction in the total amount of greenhouse gases over the course of the first two carbon periods ending 31 December 2030 relative to 2018 annual emissions. The amended Act defines the carbon budget as 'the total amount of greenhouse gas emissions that are permitted during the budget period'.

The Act also outlines duties for certain bodies (which includes consenting authorities) under Article 15 (1) as follows:

A relevant body shall, 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.

3.2.1.2 Coolglass Decision

The Supreme Court gave judgment in Coolglass Wind Farm Limited v An Bord Pleanála[1] on 4 February 2026 to clarify how climate obligation must be taken into account by Planning Authorities when making planning decisions. It confirms that, in determining an application for renewable energy development, ACP must engage in a **real and substantive way** with the **climate benefits** of the project.

The judgment emphasises that renewable electricity and climate mitigation benefits of development must be expressly considered as part of the planning balance. At the same time, the Court made clear that section 15 of the Climate Action and Low Carbon Development Act 2015 (as amended) does **not** create an automatic presumption in favour of every renewable

energy project, **but it does require that climate objectives be meaningfully addressed within the decision-making process.** (emphasis added)

In this regard, the proposed development is consistent with each of the matters identified in section 15(1)(a)–(e) of the Climate Action and Low Carbon Development Act 2015, as amended, insofar as it would contribute to the delivery of renewable electricity, support national emissions reduction and climate neutrality objectives, and form part of the wider transition to a climate-resilient energy system:

Section 15(1) criterion	Response of proposed development
(a) The most recent approved climate action plan	The proposed development aligns with the **most recent approved Climate Action Plan**, namely **Climate Action Plan 2025**, which identifies the transition to renewable electricity as a central part of Ireland's pathway to halving emissions by 2030 and achieving climate neutrality by no later than 2050. The Plan states that Ireland is to achieve **80% of electricity demand from renewable sources by 2030**. In that context, a wind farm with the potential to produce up to between 222,592 and 291,393 MWh (Megawatt hours), capable of generating clean electricity for between **52,998 and 69,379 households annually**, would make a direct contribution to the delivery of additional renewable electricity generation capacity The proposed project also directly aligns with the CAP25 target of delivering 9 GW of onshore wind by 2030.
(b) The most recent approved national long term climate action strategy	The proposed development is also consistent with Ireland's **Long-term Strategy on Greenhouse Gas Emissions Reductions**, which sets out the pathway to achieving **carbon neutrality by 2050** and includes the decarbonisation of the electricity sector as a key component of that transition. By increasing the supply of indigenous renewable electricity over the long term, the proposed development would contribute to the structural decarbonisation of the national energy system.
(c) The most recent approved national adaptation framework and approved sectoral adaptation plans	The proposed development is capable of being advanced in a manner consistent with the **National Adaptation Framework**, published in **2024**, which provides the national strategy for adaptation measures and requires public bodies and infrastructure sectors to plan for climate resilience. While adaptation is distinct from mitigation, a well-sited (see section 3.4.2 of this report) and appropriately designed wind farm forms part of the resilient electricity infrastructure required in the context of climate change. On that basis, the proposed development would support a more climate-resilient energy system, subject to detailed design and assessment.
(d) The furtherance of the national climate objective	The **national climate objective** under the 2015 Act, as amended, is for the State to pursue and achieve, by no later than **2050**, the transition to a **climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy**. The proposed development would support the furtherance of that objective by generating renewable electricity at utility scale and displacing electricity otherwise generated from fossil fuels. In doing so, it would contribute to the transition to a climate neutral economy and to the wider decarbonisation of Ireland's energy system.
(e) The objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State	The proposed development directly supports the objective of **mitigating greenhouse gas emissions** by increasing the supply of renewable electricity and reducing reliance on carbon-intensive generation. Given its potential to produce up to between 222,592 and 291,393 MWh (Megawatt hours) and its ability to generate clean electricity for between **52,998 and 69,379 households annually,** the development would make a material contribution to national emissions

	reduction efforts. In addition, by adding domestic renewable generation to the electricity system, the proposed development also supports climate adaptation in a broader strategic sense by strengthening energy resilience and reducing dependence on fossil fuel-based supply.

3.2.2 National Policy

3.2.2.1 National Planning Framework (NPF) First Revision

The revised NPF is strongly supportive of wind energy development and has set a target of **9 GW of onshore wind by 2030**. It recognises that:

> *'In the energy sector, transition to a carbon neutral economy from renewable sources of energy is an integral part of Ireland's climate change strategy and renewable energies are a means of reducing our reliance on fossil fuels.'*[1]

To support the country's renewable energy ambitions, particularly in relation to onshore wind, the first revision of the NPF has introduced regional renewable energy capacity allocations. National Policy Objectives (NPOs) 74 and 75 introduce a structured approach to planning for renewable electricity capacity. Regional Assemblies are required to plan for specific onshore wind and solar capacity allocations, as set out in Figure 3-1 below.

The proposed development is located in the Northern and Western Region. As of 2023, the region had an energised onshore wind capacity of 1,761 MW. To meet national climate and energy goals, an additional 1,389 MW of onshore wind capacity is allocated for development by 2030. This brings the region's total share of the national onshore wind target to a significant 35% of the national share in 2030.

Table 9.1 | Regional Renewable Electricity Capacity Allocations

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

Figure 3-1: Regional Renewable Energy Capacity Allocations

NPO 70 promotes the generation and use of renewable energy in suitable locations across both built and natural environments to help meet Ireland's 2050 climate neutrality goals. These

[1] Government of Ireland, **National Planning Framework First Revision** (April 2025), p. 132

objectives ensure that renewable energy development is integrated into spatial planning at all levels, supported by scientific evidence and aligned with legislative requirements. Additional objectives, such as NPOs 87, 89, and 94, reinforce environmental protection, heritage conservation, and noise management, ensuring that renewable energy expansion occurs within sustainable and socially responsible frameworks.

The NPF also covers a wide range of national policy objectives and National Strategic Outcomes (NSO) such as NSO 8. The key outcome provided for under NSO 8 is to transition our society to;

> *'competitive, low-carbon, climate-resilient, biodiversity rich, and environmentally sustainable and carbon neutral economy by 2050 '*and states that '*new energy systems and transmission grids will be necessary for a more distributed, more renewables focused energy generation system, harnessing both considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy'*. [2]

The NSO further states that:

> *'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 will require the progressive and strategic development of a different form of energy grid'.*

The following table identifies the principal National Policy Objectives in the revised National Planning Framework relevant to onshore wind energy development, and explains their relevance to and support for the proposed development:

Table 3-1: National Policy Objectives applicable to the proposed development

Policy	Compliance
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.	This objective provides the overarching climate policy context for planning decisions. The proposed development is supported by this objective insofar as renewable electricity generation would contribute to climate change mitigation and greenhouse gas emissions reduction in accordance with national climate targets and carbon budgets.
National Policy Objective 70 Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a climate neutral economy by 2050.	This is the principal renewable energy policy support in the revised NPF for onshore wind development. The proposed development is supported by this objective. It is located appropriately within the built and natural environment, specifically within an area identified as "available" for wind farm development under the Leitrim County Development Plan (see section 3.4.2 for further detail). The proposed development would contribute to renewable energy generation and the transition to a climate neutral economy by 2050.

[2] Government of Ireland, **National Planning Framework First Revision** (April 2025), p. 167

National Policy Objective 71 Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development.	This objective is relevant to the electricity infrastructure needed to facilitate renewable generation. The proposed development is supported by this objective insofar as the delivery of renewable electricity generating development is expressly supported, together with the grid infrastructure required to connect and accommodate such development.
National Policy Objective 72 Support an all-island approach to the delivery of renewable electricity through interconnection of the transmission grid.	This objective relates to the strategic transmission context for renewable electricity on an all-island basis. While more indirect in its application to a single project, it supports the proposed development insofar as the development would form part of the wider renewable electricity system to be enabled through transmission interconnection.
National Policy Objective 73 Support the co-location of renewable technologies with other supporting technologies and complementary land uses, including agriculture, amenity, forestry and opportunities to enhance biodiversity and promote heritage assets, at appropriate locations which are determined based upon the best available scientific evidence in line with EU and national legislative frameworks.	This objective is particularly relevant to onshore wind development, which commonly occurs in rural landscapes alongside agricultural or forestry land uses. The proposed development is supported by this objective as it can be demonstrated that the development is appropriately co-located with existing and complementary land uses, having regard to biodiversity, heritage, scientific evidence and legislative requirements. This is demonstrated in the policy tables presented in this report and the supporting documents of the submitted EIAR and NIS.
National Policy Objective 74 Each Regional Assembly must plan, through their Regional Spatial and Economic Strategy, for the delivery of the regional renewable electricity capacity allocations indicated for onshore wind and solar reflected in Table 9.1 below, and identify allocations for each of the local authorities, based on the best available scientific evidence and in accordance with legislative requirements, in order to meet the overall national target.	This objective is directly relevant to onshore wind because it requires regional planning for delivery of onshore wind capacity allocations. The proposed development is supported by this objective insofar as it would contribute to the delivery of the relevant regional and local onshore wind capacity needed to meet the overall national target. This wind farm would contribute about 77-100.8 MW of installed onshore wind capacity, which is roughly 5.5%-7.3% of the Northern and Western region's additional wind allocation as set out above, in Table 3-2

Overall, the revised NPF represents a more active, plan-led approach to renewable energy development, aligning with Ireland's climate targets. It sets the stage for more integrated and regionally tailored energy planning.

3.2.2.2 National Development Plan 2021-2030

The revised National Development Plan 2021-2030 (NDP) sets out investment priorities at national, regional and local planning levels that will facilitate the implementation of the NPF. In the context of the energy sector, the principle objective is to assist in ensuring a 'long-term, sustainable and competitive energy future for Ireland'. The revised plan includes an increase in government equity shareholdings of ESB Networks and EirGrid, with €3.5 billion in equity earmarked for energy projects. Chapter 8 of the NDP outlines reforms proposed to support financial investments. These reforms are identified as being critical to meet climate targets.

3.2.2.3 Climate Action Plan 2025 (CAP 25)

Climate Action Plan 2025 (CAP25) marks the fourth annual update to Ireland's Climate Action Plan. Building on CAP23 and CAP24, CAP25 aims to expedite the deployment of onshore wind, targeting 9 GW by 2030 to achieve an overall target of 80% share in renewable electricity by 2030.

The plan emphasizes the necessity for rapid and substantial reductions in greenhouse gas emissions to meet the 2015 Paris Agreement and the UN's Sustainable Development Goals.

Additionally, it highlights the importance of the revised National Planning Framework (NPF), which supports the development of electricity grid infrastructure by establishing regional renewable electricity capacity targets for 2030.

CAP25 recognises that Ireland must significantly increase levels of renewable energy in the country and sets out the roadmap to deliver on Ireland's climate ambition which aligns with the legally binding economy-wide carbon budgets and sectoral ceilings that were agreed by Government in July 2022.

CAP 25 aims to build on the progress made under CAP24 which stated *"transformational policies, measures and actions, and societal change are required to increase the deployment of renewable energy generation, strengthen the grid, and meet the demand for flexibility in response to the challenge*" by delivering policies, measures and actions that will support the achievement of our carbon budgets, sectoral emissions ceilings, and 2030 and 2050 climate targets.

It is important to note the key metrics to deliver abatement in electricity as outlined in CAP24 to deliver a decarbonised economy for Ireland by 2050, as shown in Figure 3-2 below:

Table 12.5 – Key Metrics to Deliver Abatement in Electricity[71]

Theme	2025 KPI	2025 abatement (vs. 2018) $MtCO_2eq.$	2030 KPI	2030 abatement (vs. 2018) $MtCO_2$ eq.	2031-2035 measures
Accelerate Renewable Energy Generation[72]	50% renewable electricity share of demand 6 GW onshore wind capacity Up to 5 GW solar PV capacity, including at least 1 GW of new non-utility solar	2. 21	80% renewable electricity share of demand 9 GW onshore wind capacity At least 5 GW offshore wind capacity 8 GW solar PV capacity, including 2.5 GW of new non-utility solar Green hydrogen production from renewable electricity surplus generation	7.18	Decarbonisation Roadmap for a net-zero power system Green hydrogen production via 2 GW offshore wind
Accelerate Flexibility	Maximum level of renewables at any one time on the grid: 85% Dispatch down (excluding surplus generation) of renewables below 7% Minimise surplus generation Required long term storage (4 hour plus) in place	See above abatement figure	Maximum level of renewables at any one time on the grid: 95-100% Dispatch down (excluding surplus generation) of renewables below 7% Minimise surplus generation Required additional long-term storage (4 hour plus) in place At least 2 GW of new flexible gas-fired generation Zero-emission gas-fired generation from biomethane and hydrogen commencing by 2030	See above abatement figure	Required additional long duration storage technologies in place Increased zero emission gas-fired generation to enable a net zero power system
Demand Management	Demand side flexibility 15-20% Zero carbon demand growth	2.21	Demand side flexibility 20-30% Zero carbon demand growth	7.18	Demand side flexibility 30% Zero carbon demand growth
Total Estimated Abatement Potential					

Figure 3-2: CAP24 Key Metrics to Deliver Abatement in Electricity

3.2.3 Other Policies

3.2.3.1 National Energy Security Framework

The National Energy Security Framework was launched in 2022 to provide an overarching and comprehensive response to Ireland's energy security needs in the context of the war in Ukraine.

The Framework sets out how the government can support households and businesses, with a particular focus on protecting those most at risk of fuel poverty, how it is already ensuring Ireland's energy security, and how it will speed up the country's shift to increased energy efficiency and indigenous renewable energy systems. It also sets out how consumers and businesses can be supported to save energy and save money.

The Framework sets actions in response to issues such as ensuring the security of energy supply in the near-term and over the longer term, reducing Ireland's dependency on imported fossil fuels.

Within the context of the framework, the proposed development will increase Ireland's renewable wind capacity thereby reducing the need for fossil fuels.

3.2.3.2 Irelands Greenhouse Gas Emission Projections 2016-2035

The National Climate Change Strategy designated the Environmental Protection Agency (EPA) with responsibility for developing annual national emission projections for greenhouse gases across all key sectors of the economy, including transport. The Intergovernmental Panel on Climate Change (IPCC) has reiterated that the window for climate action is rapidly closing. To limit global warming to below 2°C, renewable energy sources such as wind must grow from around 30% of global electricity generation to at least 80% by 2050, with deep and sustained emissions reductions across all sectors required this decade[3].

The EPA's most recent publication, the State of the Environment Report 2024[4], identified climate change and biodiversity loss as Ireland's most pressing environmental challenges. The EPA acknowledged the government's Climate Action Plan as an important step toward meeting national and EU climate goals, but graded Ireland's current performance on tackling greenhouse gas emissions as "very poor."

The EPA's latest projections (2025) show that Ireland is not on track to meet its legally binding 51% emissions reduction target by 2030. Even with all planned measures, emissions are projected to fall by only 23% compared to 2018 levels, and Ireland may need to purchase emissions allocations from other EU member states to meet its obligations. The EPA also noted that Ireland could meet its non-ETS EU target of a 30% reduction by 2030 (compared to 2005) only if all planned policies are implemented.

3.2.3.3 National Energy and Climate Plan (NECP) 2021-2030

The NECP was prepared in 2019 to incorporate all planned policies and measures that were identified up to the end of 2019 and which collectively deliver a 30% reduction by 2030 in non-ETS greenhouse gas emissions (from 2005 levels).The NECP recognises the commitment

[3] The evidence is clear: the time for action is now. We can halve emissions by 2030. — IPCC
[4] Ireland's State of the Environment Report 2024 | Environmental Protection Agency

set out under the Climate Action Plan 2021, to reduce CO2 eq. emissions from the sector by 50–55% relative to 2030.

In accordance with the Governance of the Energy Union and Climate Action Regulation, a draft updated National Energy & Climate Plan (NECP) 2021-2030 was submitted to the European Commission in December 2023. The final National Energy and Climate Plan (NECP), adopted in July 2024, sets out Ireland's projected renewable energy trajectory to 2030. The Plan acknowledges that, while Ireland remains committed to achieving its overall 2030 renewable energy targets, the trajectory is back-loaded and does not fully align with the indicative EU trajectory in the earlier part of the decade. This is primarily attributed to the delivery timelines associated with large-scale renewable energy infrastructure, particularly offshore wind projects, which involve long lead-in periods and are therefore unlikely to be fully operational until the latter part of the decade.

3.2.4 National Policy Context Conclusion

Ireland aims to reach carbon neutrality by 2050 and generate 80% of electricity from renewables by 2030. Supported by the Programme for Government 2025, Climate Action Plans 2024 and 2025, and national planning policy, the proposed Wind Farm contributes directly to these goals by providing clean electricity, supporting onshore wind targets, and reducing reliance on fossil fuels.

Ireland remains off track to meet its legally binding emissions targets, with projected reductions by 2030 still well below the required 51%. This highlights the need to accelerate renewable energy delivery and streamline planning. The proposed Wind Farm supports this by helping reduce emissions, strengthening energy security, and contributing to regional and national renewable energy capacity targets.

The proposed development also aligns with the National Planning Framework 2025 and the National Development Plan 2021–2030 by supporting renewable energy expansion, grid integration, and long-term energy resilience. Overall, the proposed Wind Farm is consistent with Ireland's climate, energy, and planning policy objectives and will help advance its 2030 and 2050 targets.

3.3 Regional Policy

3.3.1 Regional Spatial and Economic Strategy, Northern and Western Region 2020

The Regional Spatial and Economic Strategy (RSES) provides a high-level development framework for the Northern and Western Region that supports the implementation of the National Planning Framework (NPF) and the relevant economic policies and objectives of Government. It sets out the following Regional Policy Objectives (RPO) in support of the proposed development:

Table 3-2: Regional Policy Objectives applicable to the proposed development

Policy	Compliance
Regional Policy Objective 4.17 – To position the region to avail of the emerging global market in renewable energy by, stimulating the development and deployment of the most advantageous renewable energy systems, supporting research and innovation, encouraging skills development and transferability, raising awareness and public understanding of renewable energy and encourage market opportunities for the renewable energy industry to promote the development and growth of renewable energy businesses and encourage the development of the transmission and distribution grids to facilitate the development of renewable energy projects and the effective utilization of the energy generated from renewable sources having regard to the future potential.	The proposed development supports this objective by delivering additional renewable generation capacity and investment in the regional renewable energy sector, consistent with stimulating deployment of renewable energy systems. The proposed development can also support skills development and local supply-chain participation through construction and operational requirements, and it relies on (and can help justify) appropriate transmission/distribution network development to enable renewable integration and effective utilisation of the electricity generated.
Regional Policy Objective 4.18 – Support the development of secure, reliable, and safe supplies of renewable energy, to maximise their value, maintain inward investment, support indigenous industry and create jobs.	The proposed development demonstrates compliance by providing a secure, indigenous source of renewable electricity which contributes to regional and national energy security and decarbonisation objectives. The proposed development supports economic benefits consistent with the RPO through construction-phase employment, operational roles, and wider supply-chain activity, while also contributing to a reliable renewable energy supply that underpins inward investment and indigenous industry.

3.3.2 Regional Policy Context Conclusion

The proposed wind farm aligns with the objectives of the Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region, which supports the transition to a low-carbon economy and the implementation of the National Planning Framework.

3.4 Local Policy

The proposed development lies within the functional area of Leitrim County Council, while the proposed Turbine Delivery Route runs through Counties Leitrim, Donegal and Sligo. The proposed development is thus informed by the provisions of the Leitrim County Development Plan 2023-2029, Sligo County Development Plan 2024-2030, and Donegal County Development Plan 2024-2030. This section sets out the relevant objectives, policies, and provisions for the proposed development at a local level.

3.4.1 Leitrim County Development Plan 2023-2029

The Leitrim County Development Plan (CDP) came into effect on the 21st March 2023. It sets out key strategic aims over the lifetime of the plan, one of which seeks to:

> *"To support, in principle, development that addresses climate change in terms of adaptation and mitigation measures including increasing flood resilience, the promotion of sustainable transport options and the development of renewable energy technologies where possible to achieve a successful transition to a low carbon economy."*[5]

Sections 12.6.1 and 12.6.2 of the CDP set out the Leitrim County Renewable Energy Strategy and the Council's policy on Wind Energy. It is recognised that Leitrim:

> *"has an abundance of natural resources that can be harnessed in a sustainable manner, without negatively impacting on the environment. There is potential for a range of renewable energy technologies, including wind energy."*[6]

Tables 3-3 and 3-4 are provided to identify key policies in support of the proposed development and to demonstrate the strong compliance of the proposed development with the same. The tables should be read in conjunction with the planning application submitted, including the Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS) and Construction Environmental Management Plan (CEMP), together with the other supporting surveys, plans and assessments listed in the application appendices.

The proposed development is predominantly situated within an area identified as favourable for wind energy, or an 'available' area, in the Leitrim County Development Plan. While two of the turbines are positioned immediately adjacent to this designated zone, they remain fully capable of being supported under the provisions of the Development Plan.

[5] Leitrim County Council (2023) *Leitrim County Development Plan 2023–2029, Volume I*, p. 19.

[6] Leitrim County Council (2023) *Leitrim County Development Plan 2023–2029, Volume I*, p. 322.

Table 3-3: Leitrim CDP Policies (Renewables, Wind)

Policy	Compliance
RE POL 1 – To encourage and facilitate the production of energy from renewable sources, such as from wind, solar, bioenergy, hydroelectricity, and geothermal, subject to compliance with proper planning and environmental considerations.	The proposed development is a renewable energy project (wind) and therefore directly supports the objective of encouraging renewable energy production. The proposed development will be advanced subject to proper planning and environmental considerations through the planning application process and the accompanying environmental assessment and mitigation measures.
RE POL 2 – To promote and support developments and actions that assist in achieving the national targets for energy from renewable resources and reducing greenhouse gas emissions associated with energy production.	The proposed development supports the achievement of national renewable electricity targets by adding **222,592 and 291,393 MWh (Megawatt hours)** of renewable generation capacity and displacing fossil fuel-based electricity generation. The projected output (supplying clean electricity for between c. **52,998 and 69,379 households annually**) contributes to reducing greenhouse gas emissions associated with electricity production.
RE POL 3 – To ensure environmental assessments for new energy developments should address reasonable alternatives for location. Where existing infrastructural assets such as substations, powerlines and roads already exist within proposed development areas, then such assets should be considered for sustainable use by the proposed development where the assets have capacity to absorb the new development.	The submitted EIAR can demonstrate compliance by considering reasonable alternatives for location/layout and by identifying opportunities to utilise existing infrastructure (e.g., existing access routes, nearby grid infrastructure, substations/powerlines) where available and suitable. Where existing assets have capacity, their use reduces land-take and potential environmental effects relative to constructing entirely new infrastructure.
RE OBJ 1 – To seek to achieve a minimum of 200 MW of renewable electricity in the county by 2030, by facilitating renewable energy developments, including micro-generation renewable technologies incorporating solar, wind, hydro-electric and bioenergy.	The proposed development will make a meaningful contribution toward the County objective of delivering at least **200 MW** of renewable electricity by 2030. Its scale 77-100.8 MW could represent over 35% of the target renewable energy capacity for County Leitrim. This would be a substantial portion of that target at a suitable site which supports the Plan's intent to facilitate renewable electricity generation, including wind energy.
WE POL 1 – To acknowledge the importance of wind energy in Co. Leitrim as a renewable energy source which can play a vital role in achieving national targets in relation to reductions in fossil fuel dependency and therefore greenhouse gas emissions.	The proposed development aligns with this policy by delivering utility-scale onshore wind generation, thereby reducing reliance on fossil fuels and associated emissions. The projected annual household-equivalent output demonstrates a tangible contribution to national targets and energy security objectives.
WE POL 2 – To encourage the development of wind energy in suitable locations and in an environmentally sustainable manner to ensure the	The proposed development is consistent with the policy objective where it is located within a suitable receiving environment and is designed to avoid, reduce and mitigate significant adverse effects. The

security of energy supply, in accordance with Government policy and the Leitrim County Renewable Energy Strategy (2021).	development supports security of supply through indigenous renewable generation and can be demonstrated to align with Government policy and the Leitrim County Renewable Energy Strategy (2021), through site selection, design evolution and environmental safeguards. The proposed development is predominantly situated within an area identified as favourable for wind energy, or an 'available' area, in the Leitrim County Development Plan. While two of the turbines are positioned immediately adjacent to this designated zone, they remain fully capable of being supported under the provisions of the Development Plan.
WE POL 3 – To ensure that the assessment of wind energy development proposals will have regard to specified matters (landscape sensitivities; visual impacts; nature conservation/ archaeology/ geology/ heritage/ rights of way; residential impacts incl. noise/shadow flicker; impacts of associated works; scale/layout and cumulative effects; protected bird and mammal species).	The proposed development demonstrates compliance by explicitly addressing each of the listed assessment matters within the submitted EIAR and supporting technical reports (e.g., landscape/visual assessment, ecology and ornithology, noise, shadow flicker, cultural heritage, hydrology, traffic/access, and cumulative assessment). Commitments to embedded design measures and mitigation including construction management and monitoring provide the mechanism by which the proposal has full regard to these considerations.
WE POL 6 – To have regard to the principles and planning guidance set out in Department of Housing, Planning and Local Government publications relating to 'Wind Energy Development' and the DCCAE Code of Practice for Wind Energy Development in Ireland and any other relevant guidance which may be issued.	The proposed development has given due regard to the applicable national wind energy guidance and codes of practice through the preparation of the planning application and technical assessments (including noise, shadow flicker, setback considerations, and community/amenity considerations as relevant). Compliance is demonstrated by explicitly referencing the applicable guidance within the EIAR and adopting its methodologies/standards.
WE OBJ 1 – To secure the maximum potential from the wind energy resources of Co. Leitrim commensurate with supporting development that is consistent with proper planning and sustainable development of the area.	The proposed development supports this objective by harnessing the county's wind resource at a meaningful scale (**77 MW - 100.8 MW**). The design, assessment, and mitigation strategy are intended to ensure that renewable energy delivery is balanced with environmental protection and amenity considerations.
ENI POL 2 – To co-operate and liaise with statutory and other energy providers in relation to power generation in order to ensure that the energy needs of future population and economic expansion within designated growth areas and across the wider region can be delivered in a sustainable and timely manner, which minimises impacts on environmental sensitive and high visual quality areas and that capacity is available at local and regional scale to meet future needs.	The proposed development supports this policy through engagement with relevant network operators and statutory bodies to confirm feasible connection options and to coordinate any associated works. The siting and design approach, minimises impacts on sensitive and high visual quality areas while supporting local and regional capacity needs through additional renewable generation.

ENI POL 4 – To support the renewal, reinforcement and strengthening of the electricity transmission network with particular reference to the regionally important projects such as Renewable Integration Development Project.	The proposed development supports the rationale for strengthening the grid by adding renewable generation that relies on an efficient and reinforced network.

Table 3-4: Leitrim CDP Policies & Objectives (Natural and Built Heritage)

Policy	Compliance
NH POL 1 – NATURA 2000 Sites: To protect and conserve Special Areas of Conservation and Special Protection Areas.	The proposed development complies with NH POL 1 – Natura 2000 Sites as demonstrated in the Natura Impact Statement, which identifies all relevant European sites, assesses potential pathways for impact, and applies a precautionary, evidence-based Appropriate Assessment in line with the Habitats and Birds Directives. The NIS systematically evaluates risks such as habitat loss, groundwater or surface-water contamination, disturbance to qualifying species, and the spread of invasive species, and provides a comprehensive suite of avoidance and mitigation measures— including strict water-quality protection, invasive species controls, and ecological supervision—ensuring that no adverse effects on the integrity of any Special Area of Conservation or Special Protection Area will occur, either alone or in combination with other plans or projects. As a result, the project demonstrates full compliance with the policy requirement to protect and conserve SACs and SPAs.
NH POL 2 – Appropriate Assessment: To implement Article 6(3) and where necessary Article 6(4) of the Habitats Directive… and ensure Appropriate Assessment is carried out… in compliance with the Birds and Natural Habitats Regulations 2011 (as amended) and the Planning and Development Act 2000 (as amended).	The proposed development follows the Article 6(3) process, including screening for Appropriate Assessment and preparation of a Natura Impact Statement to support AA. The assessment has considered in-combination effects.
NH POL 3 – Natural Heritage Areas: To protect designated NHA and pNHA sites and seek to develop linkages between designated sites and other non-designated sites of ecological importance.	The proposed development complies with NH POL 3 by fully identifying all Natural Heritage Areas (NHAs) and proposed NHAs within the Zone of Influence and rigorously assessing potential source–pathway–receptor linkages to these sites, including Dough/Thur Mountain NHA and the suite of pNHAs connected via hydrological or ecological pathways. The EIAR demonstrates that the project design has incorporated the mitigation hierarchy—prioritising avoidance, minimising disturbance, and applying targeted mitigation and compensation measures—to ensure no significant residual effects on the integrity or conservation value of designated NHA or pNHA sites. In addition, the project supports the policy aim of developing ecological linkages by protecting and enhancing key habitat corridors (such as hedgerows, treelines, riparian zones, and blanket bog/wet heath areas) and implementing habitat management and restoration measures that contribute to wider landscape-scale ecological connectivity. Overall, the assessment concludes that, with embedded and additional mitigation in place, the development will not adversely affect designated or proposed NHAs and is therefore compliant with NH POL 3.
NH POL 5 – Biodiversity: To ensure that development does not have a significant adverse impact on plant, animal or bird species or habitats protected by law, subject to satisfactory mitigation measures.	The proposed development has been informed by ecological survey and assessment, with mitigation and monitoring proposed to ensure no significant adverse impacts on legally protected species or habitats, and to ensure any residual effects are avoided or reduced to acceptable levels. The EIAR demonstrates compliance with NH POL 5 through a suite of robust mitigation and compensatory measures, including avoidance of sensitive habitats via micro-siting and ≥50 m watercourse buffers, strict protection of legally protected species through pre-construction surveys, exclusion zones and timing restrictions, invasive species biosecurity protocols, and comprehensive water-quality safeguards such as SuDS, silt fencing, sediment traps and hydrocarbon interceptors; while biodiversity net gains are delivered through targeted habitat creation and management—most notably 5.4 ha of upland blanket bog/wet heath restoration, 2 ha of marsh-fritillary grassland, 2.3 ha of mixed broadleaved woodland, and over 1.5 km of new hedgerow/treeline planting—ensuring that no significant adverse impacts occur and that overall biodiversity value is enhanced.
NH OBJ 5 – Biodiversity: To protect the character, appearance and quality of habitats and semi-natural features in Co. Leitrim such as woodlands, hedgerows, peatlands, wetlands and artificial waterways of historic or ecological importance.	The proposed development is designed to retain and protect key semi-natural features, using micro-siting and construction controls to avoid unnecessary disturbance. Where impacts cannot be fully avoided, appropriate mitigation, reinstatement and habitat management measures will be applied.
NH POL 6 – Biodiversity: To protect and where possible enhance wildlife habitats and landscape features that act as ecological corridors/networks and stepping stones… and to minimise loss of wider countryside habitats.	The proposed development will maintain ecological connectivity by retaining and protecting corridors such as hedgerows and riparian features where feasible. The layout and construction approach will minimise habitat loss and incorporate measures to restore or enhance habitat features where appropriate.
NH POL 7 – Biodiversity: To treat uplands of North Leitrim above the 160m contour as an ecologically-sensitive entity where not already designated.	Where the proposed development is located within or adjoining upland areas above the 160m contour, ecological sensitivity has been treated as a key constraint in site selection, layout and mitigation, supported by appropriate survey, assessment and habitat protection measures. The siting of turbines avoids the direct loss of Annex I priority habitat type 7130 *Blanket bog (active) in favourable condition.
NH POL 8 – Biodiversity: To protect ecological networks linking protected and designated important sites within the county, in accordance with Article 10 of the Habitats Directive.	The proposed development complies with NH POL 8 – Biodiversity by maintaining and protecting the ecological networks that link multiple Natura 2000 sites, as demonstrated in the Natura Impact Statement. The assessment identifies key hydrological and ecological linkages between the Wind Farm Site and designated sites such as Lough Gill SAC, Glenade Lough SAC, Ben Bulben–Gleniff–Glenade SAC, and the coastal Cummeen Strand/Drumcliff Bay complex, and evaluates how these networks support species including otter, salmonids, lamprey, and wetland birds. The project incorporates targeted safeguards—such as strict surface-water protection during trenching, measures to prevent the spread of invasive species along the Grid Connection Route, and controls to avoid disturbance to mobile species that move between connected habitats—ensuring that these ecological corridors remain functional throughout construction and operation. Through these measures, the project actively protects the permeability and integrity of ecological networks in accordance with Article 10 of the Habitats Directive.
NH POL 9 – Biodiversity: To ensure that appropriate mitigation and/or compensation measures… are required where habitats are at risk or lost as part of a development.	The proposed development applies the mitigation hierarchy (avoid–mitigate–compensate) and, where significant effects remain post-mitigation, proportionate compensation and/or enhancement measures have been provided.
NH OBJ 8 – Green Infrastructure: To identify and map… habitats and green infrastructure/sites of local biodiversity value… and raise awareness/understanding of natural heritage and biodiversity.	The proposed development is supported by baseline ecological mapping and reporting, which contributes to the understanding of local biodiversity value and green infrastructure. The proposed

	development incorporates site management measures that enhance awareness and long-term protection of ecological features.
NH OBJ 10 – National Biodiversity Action Plan: To support implementation of the Co. Leitrim Biodiversity Action Plan 2022–2027 (when finalised) or successor plan.	The proposed development supports the implementation of the Leitrim Biodiversity Action Plan 2022–2027 by incorporating extensive biodiversity protection, habitat management and species-focused mitigation measures that align with the plan's emphasis on safeguarding sensitive habitats, improving ecological connectivity, and protecting priority species. The EIAR integrates wide-ranging actions such as habitat restoration (including blanket bog, wet heath and wet grassland), invasive-species control, safeguarding water quality through SuDS and buffer zones, and targeted measures for protected species like bats, otter and marsh fritillary—all of which directly respond to the biodiversity priorities highlighted by Leitrim County Council during consultation.
AGI POL 2 – Geology: To protect County Geological Sites from inappropriate development.	The proposed development has identified County Geological Sites within the study area. Dough mountain GHS covers an area of 10.26 km2. The southeastern side of Dough Mountain has been blanketed in scree and other slope deposits. Borrow pit 2, Turbines 5, 6, 8, 13 and 14 are located in the Dough mountain geological heritage site but comprise less than 0.1km2 of the 10.26km2. GSI describes Dough Mountain as "a particularly complex site in terms of its' geological history, and has an array of unusual karst features, upland ribbed moraines and straight-as-an-arrow stream gullies". Turbines were relocated to avoid karst features and avoided effects on the *upland ribbed moraines and straight-as-an-arrow stream gullies*. The proposed development will work with the GSI to provide additional geological information and access to enhance the geological knowledge and interest of the site.
TWH POL 1 – Trees and Hedgerows: To discourage felling of healthy mature trees and encourage retention within developments to the maximum extent practicable.	The proposed development has been designed to retain healthy mature trees where practicable, with tree protection measures during construction. Where removal is unavoidable, it has been minimised and addressed through replacement planting and habitat reinstatement of 1.53km of native treelines and hedgerows.
TWH POL 2 – Trees and Hedgerows: To require planting of native broadleaved species and species of local provenance in new developments as appropriate.	The proposed development will incorporate 1.53km of native treeline and hedgerow planting and reinstatement using locally appropriate species where landscaping, screening, restoration or biodiversity enhancement is proposed, consistent with the Plan's planting requirements.
TWH POL 3 – Woodlands: To support schemes and initiatives that establish/enhance woodlands for recreational and wildlife benefits.	The proposed development supports this objective through habitat reinstatement of 2.3ha of native broadleaved woodland to increase biodiversity and wildlife benefits.
TWH POL 4 – Trees and Hedgerows: To protect and preserve existing hedgerows and minimise their removal; where removal is necessary, seek replacement with new native hedgerow material.	The proposed development has minimised hedgerow removal through layout design and access planning. Where removal is unavoidable, replacement planting with native hedgerow species will be provided and managed to re-establish connectivity and landscape character.
IS POL 1 – Invasive Species: To require proposals to address invasive alien species and (if necessary) submit an Invasive Species Management Plan	The proposed development will include invasive species screening and an Invasive Species Management Plan (EIAR Chapter 5 Appendix 5-6 – Invasive Species Management Plan) detailing treatment, biosecurity and monitoring measures to prevent introduction or spread during construction and operation.
WQ POL 2 – Water: To support Drinking Water Protection Plans and Source Protection Plans… and mitigation/protection measures for protected areas.	The proposed development has assessed effects on water resources and any protected drinking water areas, and includes pollution prevention, drainage design and construction controls aligned with protection plans and River Basin objectives where applicable.
WQ POL 9 – Water: To permit new development only where Irish Water confirms sufficient capacity for wastewater collection, treatment and disposal.	No public connection is proposed, suitable on-site arrangements will be designed and assessed to avoid impacts on water quality.
WQ POL 10 – Water: To assess proposals in terms of impacts on human health and potential pollution (noise, fumes, odours, dust, grit, vibration) and require mitigation.	The proposed development has been assessed for potential nuisance and pollution effects, with mitigation (e.g., construction management, noise controls, dust suppression, traffic management and pollution prevention) to eliminate adverse impacts or reduce them to an acceptable level.
FRM POL 2 – Flood Risk: To ensure a flood risk assessment is carried out in accordance with the national flood risk guidelines and Circular PL2/2014.	The proposed development is supported by an appropriate Flood Risk Assessment, applying the sequential approach and identifying any necessary design measures to avoid increased flood risk on-site or elsewhere. The Flood Risk Assessment concludes that the proposed development is not located within any OPW-mapped flood zones, and therefore are not at risk from fluvial or groundwater flooding. No increase in off-site flood risk is predicted because the design incorporates appropriate drainage, SuDS measures, and clear-span watercourse crossings. With these embedded and additional mitigation measures in place, the FRA confirms no significant flood-related effects during construction, operation, or decommissioning.
FRM POL 9 – Flood Risk: To ensure consideration of impacts on surface water quality having regard to River Basin Management Plan targets/measures.	The proposed development includes assessment of surface water quality effects and incorporates drainage, sediment control and pollution prevention measures consistent with RBMP targets and relevant local measures.
FRM POL 10 – Flood Risk: Development to be accompanied by a Development Management Justification Test when required; apply sequential approach in site planning; avoid encroachment on flood plains.	The Flood Risk Assessment concludes that the proposed wind farm, grid connection route (GCR), and turbine delivery route (TDR) are not located within any OPW-mapped flood zones, and therefore are not at risk from fluvial or groundwater flooding. No increase in off-site flood risk is predicted because the design incorporates appropriate drainage, SuDS measures, and clear-span watercourse crossings. With these embedded and additional mitigation measures in place, the FRA confirms no significant flood-related effects during construction, operation, or decommissioning.
LCA POL 1 – Landscape: To conserve and enhance the high nature conservation value of Landscape Character Areas.	The proposed development complies with LCA POL 1 by locating the wind farm within a robust and already modified upland working landscape—characterised by commercial forestry and existing wind energy infrastructure—thereby avoiding adverse effects on the most sensitive and high-value components of LCA 4 (Arroo Mountain Outliers). The LVIA confirms that the project does not intrude on the highly sensitive moorland plateau skylines or Areas of Outstanding Natural Beauty, and that all predicted landscape effects are Not Significant, owing to design-led mitigation including reduction of turbine numbers, careful turbine spacing, and substantial setbacks. As a result, the development

	conserves and avoids degradation of the high nature conservation value of the Landscape Character Area while accommodating renewable energy in an appropriate, resilient landscape context.
LCA POL 2 – Landscape: To protect, enhance and contribute to the physical, visual and scenic character of Co. Leitrim and preserve its unique landscape character.	The proposed development is informed by a landscape and visual assessment to ensure the layout, scale and design respond to the receiving landscape and minimise significant visual and scenic effects, with mitigation measures provided where appropriate.
LCA POL 3 – Landscape Sensitivity: To ensure landscape sensitivity and preservation of uniqueness of an area is an important consideration in determining appropriateness of development, with regard to siting, design and materials.	The design of the proposed development has considered the constraints of landscape sensitivity.
LCA POL 5 – Visual Impact Assessments: To require LVIA by suitably qualified professionals where development may have significant impact on medium/high sensitivity areas.	The proposed development is supported by LVIA prepared by suitably qualified professionals.
LCA OBJ 2 – Landscape: Development management to have regard to landscape value, character, sensitivity and capacity to absorb change (Landscape Character Assessment 2020).	The submitted planning application documents and specifically chapter 13, Landscape and Visual, of the submitted EIAR, demonstrate how the proposed development site has the capacity to absorb the proposed development.
LD POL 3 – Areas of High Visual Amenity: Permit development in an AHVA only where very high standard of site selection/layout/design is demonstrated and no less-sensitive location is available.	Please refer to chapter 13 of the submitted EIAR, which demonstrates that the proposed development does not result in significant residual impact to the receiving environment.
LD OBJ 4 – Landscape: To protect Areas of Outstanding Natural Beauty and Areas of High Visual Amenity from inappropriate forms of development.	The proposed development avoids inappropriate effects on AONBs and AHVAs through site selection and design.
ARCH POL 1 – Archaeology: To secure preservation (in-situ or by record) of archaeological remains (National Monuments, Recorded Monuments, protected wrecks, underwater archaeology), including setting and context.	The EIAR clearly demonstrates full compliance with ARCH POL 1 by identifying, cataloguing, and assessing all archaeological receptors within the project's defined study areas, including National Monuments, Recorded Monuments (RMP/SMR), proposed RMPs, Preservation Order sites, artefact findspots, and cultural heritage features. The assessment prioritises preservation in-situ wherever feasible, and where this is not possible due to construction requirements, the EIAR outlines preservation by detailed record, supported by test trenching, archaeological monitoring, and full documentation under licence. The use of defined 10 km, 5 km, 2 km and 50 m study areas ensures that preservation extends beyond the physical footprint to include setting and landscape context, while the baseline confirms no UNESCO or tentative sites within 30 km, guaranteeing that internationally significant assets are unaffected.
ARCH OBJ 2 – Archaeology: Development within vicinity of archaeological interest/protected wreck/underwater heritage shall not be detrimental to remains, character or setting.	The project demonstrates adherence to ARCH OBJ 2 by integrating archaeological sensitivity into the design and siting of all wind farm, Grid Connection Route (GCR), and Turbine Delivery Route (TDR) elements, ensuring development does not detract from the character, setting, or integrity of nearby heritage assets. Distances between turbines and archaeological sites—such as the closest being 146 m from T03—are documented, and indirect (primarily visual) impacts are evaluated using ZTV analysis and photomontages. Where infrastructure intersects or approaches heritage features (e.g., ringforts, demesne landscapes, historic bridges, drystone walls), the EIAR applies targeted mitigation, including avoidance, design refinements, HDD crossings, and protective working methods. The findings conclude that no significant adverse effects arise post-mitigation, and that indirect effects fall within imperceptible-to-moderate levels, thereby upholding the objective of preventing detrimental impacts on archaeological remains or their settings.
ARCH OBJ 3 – Archaeology: To require, where appropriate, an archaeological assessment or underwater archaeological impact assessment by a suitably qualified person prior to commencement of any activity that may impact archaeological heritage.	The EIAR fully implements ARCH OBJ 3 by carrying out a comprehensive Archaeological Impact Assessment (AIA) that includes desk-based research, historic landscape study, geospatial analysis, field inspection (March & July 2025), and review of previous excavations. This work was undertaken by suitably qualified archaeologists, as required by policy. The AIA also incorporates recommendations from the Department of Housing, Local Government and Heritage, calling for early assessment, visual impact appraisal, and targeted geophysical survey or testing where warranted. The EIAR mandates pre-construction archaeological monitoring and targeted trenching in areas of high archaeological potential—such as greenfield sections of the GCR and TDR, and turbine locations T03 and T07—ensuring that any previously unknown subsurface remains are identified and protected before development proceeds. Collectively, these measures satisfy the requirement that all activities that may impact archaeological heritage are preceded by appropriate expert assessment.

3.4.2 Leitrim County Renewable Energy Strategy (RES)

The Leitrim County Renewable Energy Strategy (RES) is set out under Appendix X Part A of the CDP, and has been developed to achieve a vision for Leitrim County as a place that encourages and supports the transition to a carbon neutral county.

The RES sets out the 'available areas' for new wind farm development which is based on a sieve mapping and technical analysis process. The proposed development is located within lands which are considered 'available areas' for new wind farm development as seen in Figure 3-3 below, with the exception of Turbines no. 11 and 12, which are located immediately west of this "available area". This is discussed further in section 3.4.3 below.

The central aim of the sieve mapping and technical analysis undertaken was to highlight areas of the county with the potential to accommodate wind energy development subject to significant landscape/visual constraints amongst other environmental considerations.

Section 7.1 of the RES states that "*there is a high level of support for renewable energy throughout County Leitrim, from the existing onshore wind farm developments to the various Sustainable Energy Community projects and widespread microgeneration installations."*[7] *However, the RES also acknowledges that "there is a clear need to increase the share of renewable energy generation*"[8].

Leitrim Council has proactively identified targets to support increased renewable energy production, which are set out under Table 7-1 of the RES and titled "Summary of Targets and Actions". Specific to the proposed development, the following delivery action is in place:

> *"Enabling an increase in wind energy generation by 83 MW through wind farm extensions, repowering existing wind farms, and additional wind farms (taking the total capacity in the county to 175MW)."*[9]

Based on this, it's clear that the proposed development, with a total estimated output of 77 MW - 100.8 MW will make a substantial contribution to the delivery of this County wide target. It should be noted that the targets set out in the RES are based on CAP2021 and as such are likely to be considered conservative. For context, with a capacity of approximately 77 MW - 100.8 MW, the proposed development will contribute approximately 0.86% to 1.12% of Ireland's national on shore wind target of 9 GW and approximately 5.54% to 7.27% of the region's onshore wind capacity allocation to 2030, under the revised National Planning Framework.

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[7] Leitrim County Council (2023) *Leitrim County Development Plan 2023–2029: Volume I*, Appendix X, Part A: *Leitrim County Renewable Energy Strategy (RES)*, p. 74

[8] Leitrim County Council (2023) *Leitrim County Development Plan 2023–2029: Volume I*, Appendix X, Part A: *Leitrim County Renewable Energy Strategy (RES)*, p. 74

[9] Leitrim County Council (2023) *Leitrim County Development Plan 2023–2029: Volume I*, Appendix X, Part A: *Leitrim County Renewable Energy Strategy (RES)*, p. 75

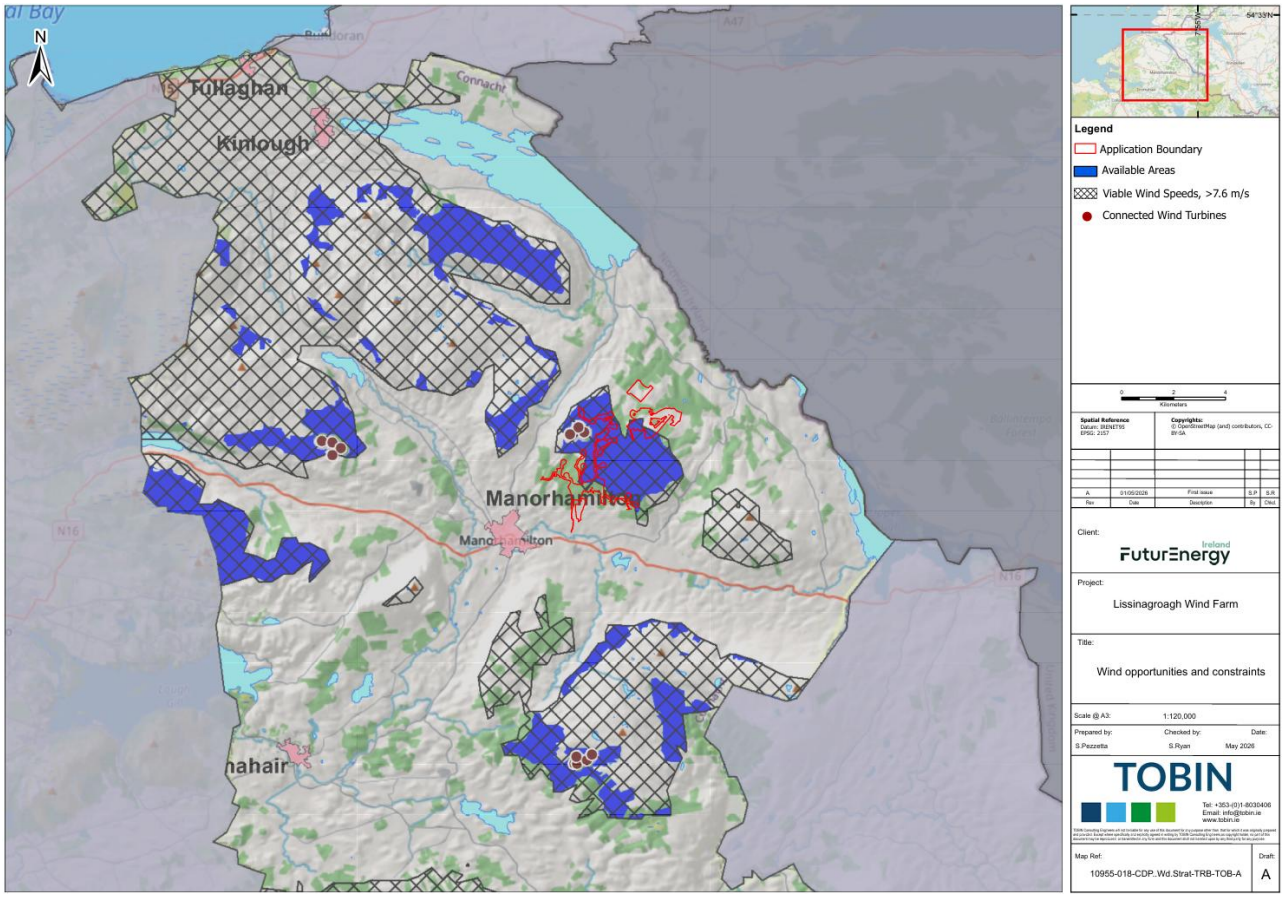

Figure 3-3: Wind Opportunities and Constraints Map

3.4.3 Turbines 11 and 12

3.4.3.1 Design Evolution

The proposed development has been designed to align with the adopted CDP and RES to the greatest extent practicable. This means that 12 of the proposed wind turbines are located in the "available area" referenced above. Two turbines, namely 11 and 12, are located immediately west of this positively zoned area, within an area where no wind energy zoning designation applies.

These turbines form an integral part of a single, coherent wind farm layout that has been sited and designed to avoid, reduce and mitigate significant adverse effects on the surrounding environment. Their placement is justified on the basis of achieving an efficient and balanced scheme design, including optimisation of turbine spacing and micrositing to maximise energy yield, while avoiding sensitive receptors and environmental constraints and maintaining appropriate setbacks. The inclusion of these two turbines also reduces the need for additional infrastructure and land-take that would arise from reconfiguring the layout to constrain all turbines strictly within the designated area, thereby supporting a more sustainable overall development and minimising cumulative impacts.

Overall, the proposed layout reflects a design-led and evidence-based approach in which the positive designation has guided turbine siting, but where limited turbines are appropriately

located immediately adjoining the zoned area to deliver a single viable project, subject to the environmental assessment and mitigation measures set out in the submitted EIAR/NIS.

3.4.3.2 Policy Context

The proposed development is predominantly located within an area identified in the Leitrim County Renewable Energy Strategy ("RES") as an "Available Area" for wind energy development. Two turbines are positioned immediately adjacent to that mapped area. In planning policy terms, that siting does not place those turbines outside the support of the County Development Plan, nor does it give rise to any material contravention issue.

The starting point is the wording of the CDP itself. Chapter 12 of Volume I explains that the purpose of the sieve mapping and technical analysis is to highlight areas of the county with the potential to accommodate wind energy development, identified as "Available Areas", subject in any event to landscape, visual and other environmental considerations. Critically, the Written Statement states that, notwithstanding the areas identified in Figures 6.3 and 6.3b of the RES, this does not preclude projects, typically of smaller scale, from being brought forward in other areas **including land adjacent to 'Available Areas',** subject to other project-specific environmental considerations and assessments.[10] That is a direct policy acknowledgement that the mapped boundary is not to be read as a prohibition line. Lands adjoining an "Available Area" remain capable of accommodating wind energy development where the proposal satisfies the relevant planning and environmental tests. (emphasis added)

The RES itself adopts the same approach. It explains that the "available areas" were derived through a strategic sieve analysis having regard to wind resource, environmental and heritage constraints, setbacks to sensitive receptors, and grid availability. It further states that the risk mapping associated with those areas is only a tool to flag areas with a higher or lower concentration of sensitivities, and that the presence of a risk category **does not support nor preclude wind energy development in and of itself**.[11] In other words, neither the designation of land as "available" nor the absence of that designation is determinative of whether a turbine can be permitted. The operative question remains whether the proposal is acceptable on its own planning and environmental merits. (emphasis added)

The CDP also confirms that wind farm proposals are to be determined in accordance with the Wind Energy Development Guidelines and the County Development Plan policy framework. The adopted RES policy table includes Objective W1 to "*Promote appropriate wind energy development in Leitrim*" and Policy W1.1 that proposals for on-shore wind farm development will be determined in accordance with the Wind Energy Development Guidelines and the County Development Plan framework. The emphasis is therefore on an assessment of appropriateness, not on a simplistic inside/outside mapping test. A turbine located just beyond the graphic edge of an "Available Area" is not thereby rendered contrary to policy; what matters is whether the proposal, taken as a whole and at project level, satisfies the applicable

[10] Leitrim County Council (2023), Leitrim County Development Plan 2023–2029, Volume I Written Statement, Chapter 12 "Infrastructure and Energy", Section 12.6.2 "Wind Energy", p. 326

[11] Leitrim County Council (2023), *Appendix X, Part A – Leitrim County Renewable Energy Strategy*, Leitrim County Development Plan 2023–2029, p. 36.

environmental, landscape, residential amenity, heritage, ecological, infrastructural and design criteria.

Importantly, the CDP also makes clear that the renewable energy figures and targets in the CDP are not a "ceiling" or "cap" on development potential in the county.[12] That is relevant here because it shows the CDP was deliberately framed to avoid an unduly restrictive or closed interpretation of mapped opportunity areas. The CDP recognises the need to balance protection of environmental sensitivities with enabling renewable energy development in a manner consistent with proper planning and sustainable development.

Against that policy background, the fact that two turbines are located immediately adjacent to, rather than wholly within, the mapped "Available Area" does not signify that they are unsupported by the CDP. Where the overall scheme is predominantly located within a mapped favourable/available area, and the adjoining turbine positions arise from detailed design optimisation and project-level environmental assessment, those turbine locations remain fully capable of being supported, provided the application demonstrates compliance with the ordinary assessment criteria.

Accordingly, the proper planning conclusion is that the two turbines located immediately adjacent to the RES "Available Area" remain eligible for support under the Leitrim County Development Plan 2023-2029. Their assessment falls to be undertaken by reference to the project-specific evidence submitted with this application, including landscape and visual effects, ecology, ornithology, residential amenity, noise, shadow flicker, cultural heritage, hydrology, traffic, aviation/telecommunications and all other relevant environmental and technical considerations. Their location outside the graphic boundary of the mapped "Available Area", in circumstances where the CDP expressly envisages proposals on land adjacent to such areas, does not of itself indicate policy conflict, prohibition, or any material contravention of the CDP.

3.4.3.3 Landscape Context

With regard to the proposed turbine array, it is noted that two turbines (T10 and T12) are located outside the 'available areas' classification as defined within the current Leitrim County Development Plan. Notwithstanding this, there is a clear and robust rationale for their inclusion within the proposed scheme.

Firstly, it is important to recognise that mapped landscape designations are strategic planning tools and do not necessarily reflect the nuanced and gradual transitions that occur within the receiving landscape. In reality, landscape character does not change abruptly along mapped boundaries; rather, it transitions progressively in response to variations in landform, land cover, and land use. In this instance, both T10 and T12 are located within parts of the landscape that are consistent with the adjoining 'available areas', characterised by upland, working landscape conditions. These areas are defined by extensive commercial forestry and transitional agricultural land uses, which collectively represent a robust and actively managed upland landscape context capable of accommodating wind energy development. It is important to note that the Risk Rating of the Available areas is classified as Low in the areas that adjoin the two

[12] Leitrim County Council (2023), Leitrim County Development Plan 2023–2029, Volume I Written Statement, Chapter 12 "Infrastructure and Energy", Section 12.6.2 "Wind Energy", p. 327

turbines contained outside of the available areas designation, further reinforcing the robustness of this part of the landscape.

Furthermore, the 'available areas' designation within the current CDP is informed by a range of environmental and planning constraints, including European and Ramsar sites, heritage assets, settlement patterns, and established infrastructure, in addition to the application of standard setback distances (including the 500 m buffer to residential receptors, as per the Wind Energy Development Guidelines 2006 and the draft 2019 Guidelines). In this regard, and with reference to landscape and visual, T10 and T12 do not give rise to any conflict with these underlying constraints. The turbines are appropriately sited with respect to sensitive receptors and are located well beyond the prescribed visual amenity setback distances, thereby ensuring that residential amenity and visual considerations are adequately protected.

From a landscape and visual perspective, the inclusion of T10 and T12 does not introduce any notable additional effects beyond those already identified for the wider scheme. The turbines are read within the context of an upland, working landscape that already accommodates large-scale forestry blocks and is influenced by wind energy development. Their positioning aligns with the broader pattern and layout of the turbine array, contributing to a coherent and legible scheme, rather than appearing as isolated or incongruous elements.

Thus, whilst T10 and T12 are technically located outside the mapped 'available areas', their siting is consistent with the underlying landscape character, does not conflict with the key constraints that informed the designation, and does not give rise to unacceptable landscape or visual effects. On this basis, their inclusion within the proposed development is considered appropriate and justified.

3.4.4 Other Local Policy

The Turbine Delivery Route (TDR) for the proposed development begins in Donegal and passes through parts of Sligo before arriving in Leitrim. Accordingly, the relevant policies within each county have been considered below.

The following is a summary description of the proposed development elements associated with the (TDR):

- Temporary Accommodation areas at fifty-seven (57) locations along a 122 km TDR to include temporary vegetation management, local strengthening of road edges and street furniture management to facilitate the transport of oversize turbine components to the wind farm site and subsequent reinstatement.

3.4.4.1 Sligo County Development Plan (CDP) 2024-2030

Sligo County CDP came into effect on November 11th 2024, and sets out the Council's strategic land use objectives and policies up to 2030.

A small portion of the TDR runs through Sligo, along the N15, through Sligo Town, and along the N16 until it reaches Leitrim. As the proposed route makes use of the national roads network it is key that it aligns with Sligo CDP's national roads policies, set forth in Volume 3, Chapter 29. The relevant policies are listed in the table below. The accommodations along the TDR are anticipated to be minimal and temporary, however the development management standards set forth for national roads in Chapter 33 have been complied with. This is particularly

important as the N15 and N16 have been identified in the CDP as roads where extra traffic production should be avoided. Specific environmental concerns have been considered in more detail in respective EIAR chapters. Tables 3-5 and 3-6 below set out key policy in support of the proposed development.

Table 3-5: Sligo CDP Policies & Objectives (Roads Policies)

Policy	Compliance with policy
P-EN-1 – Support the sustainable development, upgrading and maintenance of energy generation, transmission, storage and distribution infrastructure, to ensure the security of energy supply and provide for future needs, as well as protection of the landscape, natural, archaeological and built heritage, and residential amenity.	The proposed development supports the sustainable provision of energy generation infrastructure by delivering **77 MW - 100.8 MW** of indigenous renewable electricity capacity, thereby contributing to security of supply and future energy needs. Compliance will be demonstrated through the siting and design of turbines and associated infrastructure, and through the EIAR and supporting technical assessments which address landscape and visual effects, ecology, archaeology/built heritage, and residential amenity (including noise and shadow flicker), with appropriate mitigation and monitoring.
P-NR-1 – Protect the traffic carrying capacity of national roads… by avoiding the creation of new access points or the generation of increased traffic from existing accesses onto the N-4, N-15, N-16, N-17 and N-59 outside the 50 km/h speed limit, in accordance with Spatial Planning and National Roads – Guidelines for Planning Authorities (2012).	The proposed development is designed to protect the function and carrying capacity of the national road network by avoiding the creation of new access points onto the listed national routes outside the 50 km/h speed limit. Construction and operational traffic will be managed through a Traffic and Transport Assessment and Construction Traffic Management Plan, including route selection, timing controls and HGV management, to minimise impacts on road capacity and safety and to ensure compliance with the 2012 national roads planning guidelines.

Table 3-6: Sligo CDP Policies & Objectives (Natural and Built Heritage)

Policy	Compliance (minor roadway accommodations to facilitate turbine delivery)
P-BD-1 – Protect, conserve, enhance and sustainably manage the natural heritage, biodiversity, geological heritage, landscape and environment of County Sligo.	The proposed development comprises temporary accommodation areas and has been designed to avoid unnecessary disturbance to the receiving environment. Environmental protection measures including construction controls and reinstatement will ensure that natural heritage, landscape character and environmental quality are protected during and following the works.
P-BD-2 – Protect and, where possible, enhance protected plant/animal species and habitats under the Habitats and Birds Directives, Birds and Natural Habitats Regulations, Flora (Protection) Order, and Wildlife Acts (as amended).	The proposed development has been subject to Screening for Appropriate Assessment, and the submitted assessment documentation focuses specifically on the nature, scale and location of the roadway accommodations and any potential pathways for effects. The assessment has been undertaken in accordance with Part XAB and the Habitats Directive.
P-BD-3 – Ensure ecological impacts are appropriately assessed by suitably qualified professionals, applying best practice and the precautionary principle where uncertainty exists.	Ecological constraints relevant to the roadway accommodations (e.g., vegetation clearance, drainage outfalls, watercourse proximity) has been assessed by suitably qualified professionals, with best-practice guidance applied.
P-BD-4 – Minimise adverse impacts on existing habitats (designated or not) including mitigation and/or compensation as appropriate.	The proposed development will minimise habitat disturbance through tight working widths, protection of retained vegetation, and careful construction sequencing. Where minor habitat loss is unavoidable (e.g., verge trimming), reinstatement with suitable native species and/or localised enhancement will be provided where appropriate.
P-DSNC-1 – Protect and maintain the conservation status of designated/proposed designated sites and identify/develop non-designated "stepping stone" areas in accordance with Article 10.	The proposed development has been screened to confirm whether the roadway accommodations could affect any designated/proposed sites or ecological linkages. Where relevant, the accommodations will incorporate buffers, drainage controls and construction management to avoid pathways for effects on designated sites and to protect ecological connectivity.
P-DSNC-3 – Carry out appropriate assessment of plans/projects to determine potential impacts on designated/proposed sites and ecological corridors in accordance with the Habitats Directive and Part XAB.	The proposed development has been subject to Screening for Appropriate Assessment, and the submitted assessment documentation focuses specifically on the nature, scale and location of the roadway accommodations and any potential pathways for effects. The assessment has been undertaken in accordance with Part XAB and the Habitats Directive.
P-DSNC-4 – Ensure proposals undergo AA screening and subsequent AA stages as relevant, in consultation with NPWS as appropriate.	The proposed development has been subject to Screening for Appropriate Assessment, and the submitted assessment documentation focuses specifically on the nature, scale and location of the roadway accommodations and any potential pathways for effects. The assessment has been undertaken in accordance with Part XAB and the Habitats Directive.
P-PS-1 – Ensure development does not have a significant adverse impact incapable of satisfactory mitigation on protected plant, animal or bird species.	The proposed development does not have a significant adverse impact incapable of satisfactory mitigation on protected plant, animal or bird species.
P-PS-2 – Consult NPWS and account for licensing when development is likely to affect protected species.	The NPWS has been consulted with respect to the proposed development, with all consultation responses received provided and considered under the submitted EIAR and any other relevant assessments and surveys.
P-PS-4 – Protect biodiversity areas/networks outside designated sites and require ecological assessment for proposals likely to impact such areas/species.	The proposed development will protect biodiversity areas/networks outside designated sites and includes ecological assessment for the accommodations that are anticipated to impact such areas/species.
P-NCODS-1 – Minimise impacts on habitats of natural value forming key features of the County's ecological network; justification where local sites could be affected.	The proposed development has been designed to avoid and minimise effects on local habitats of value, through constrained accommodations extents and protection of retained features.
P-NCODS-2 – Improve ecological coherence of Natura 2000 where relevant and encourage retention/management of landscape features important for fauna/flora (Article 10).	The proposed development will retain and protect linear landscape features that function as ecological corridors (e.g., hedgerows and riparian margins). Where temporary disturbance occurs, reinstatement will be undertaken to maintain ecological coherence and connectivity.
P-NCODS-3 – Ensure development protects and enhances biodiversity where possible through minimising impacts and including mitigation/compensation to ensure biodiversity is enhanced.	The proposed development has applied the mitigation hierarchy, with reinstatement of disturbed verges/edges and, where feasible, minor enhancement measures (e.g., native verge reinstatement) to support biodiversity outcomes appropriate to the scale of the works.
P-WHT-7 – Protect trees subject to TPOs and Champion/Heritage Trees.	The proposed development will protect trees subject to TPOs and Champion/Heritage Trees.

P-INV-2 – Address invasive alien species and, if necessary, submit an Invasive Species Management Plan.	The proposed development has minimised vegetation removal and retained local biodiversity features where practicable, with any hedgerow/roadside removal limited to what is necessary for road safety and turbine delivery. Reinstatement and proportionate enhancement (e.g., native planting/edge restoration) have been incorporated where feasible, consistent with the scale of the works.
P-INW-1 – Protect rivers/streams/watercourses and Core Riparian Zones; clear-span fisheries crossings and consultation with Inland Fisheries Ireland.	Where the proposed development is near watercourses, buffers and construction controls will be applied to protect riparian zones and avoid sedimentation/pollution.
P-INW-5 – Ensure developments do not adversely affect groundwater resources or groundwater-dependent habitats/species.	The proposed development does not adversely affect groundwater resources or groundwater-dependent habitats/species.
P-WQ-5 – Have regard to the Sligo Groundwater Protection Scheme.	The proposed development will have regard to groundwater vulnerability and protection measures relevant to the accommodation's location, including controls on excavations, material handling and drainage, to protect groundwater resources and groundwater-dependent habitats/species.

3.4.4.2 Donegal County Development Plan 2024-2030

The Donegal County Development Plan (CDP) was adopted on May 16th 2024 and sets out the Council's strategic land use objectives and policies up to 2030. It demonstrates strong support for the infrastructure necessary to facilitate renewable energy projects, particularly wind energy as noted in the table below.

The proposed TDR begins at Killybegs Port and runs down the N56, to Donegal Town. It then continues to the N15. Both the N56 and the N15 have been identified in the CDP as roads in need of transport improvement projects. However, the CDP also acknowledges it as a vital transportation route for goods along the Atlantic Coast. Chapter 16 of the CDP sets forth the Technical Standards imposed on new developments, specifically outlining that development proposals which will generate significant trips by commercial vehicles, and proposed changes to junction layout will be required to submit a Traffic and Transport Assessment. Additionally, as these accommodations may be required on national roads a safety audit may be required.

The proposed TDR runs through areas designated as having high scenic amenity, and in Bundoran it runs along a road with a designated view. Additionally, the Ballintra SAC and the Dunmuckrum Turloughs SAC both lie less than 1km from the proposed route. As the TDR runs completely along existing roadway, and due to the minimal nature of accommodations required, it is not expected to have significant impact. Specific environmental concerns have been considered in more detail in respective EIAR chapters.

The CDP provides a range of policies and objectives aimed at protection of natural and built heritage. Policies and objectives which are considered relevant to the proposed development are identified in Tables 3-7 and 3-8 below.

Table 3-7: Donegal CDP Policies & Objectives (Killybegs Port & Roads)

Policy	Compliance
ED-O-17 To support the strategic importance of Killybegs as a primary commercial fishing port, and as a hub for the development of the renewable energy sector.	Indirect support: the proposed development facilitates turbine delivery logistics that support renewable energy sector activity.
ED-O-19 To facilitate continued investment in key strategic infrastructure in Killybegs Port in a sustainable manner.	Indirect support: the proposed development provides sustainable enabling road infrastructure for renewable energy logistics, proportionate in scale and with reinstatement measures.
MRCM-P-4 CC To support the development of Killybegs as a centre for Offshore Renewable Energy and as a marine logistics hub for onshore wind energy, including: • facilitating operations and maintenance; • storage infrastructure; • engineering and assembly activities ; • ancillary marine support services and training, research and development facilities; • its designation as a Comprehensive TEN-T Network Port; and • supporting the development of additional harbour infrastructure where necessary and compatible with its primary function as a fisheries harbour.	Indirect support: while not harbour works, the proposed development supports onshore turbine transport/logistics associated with wind energy delivery.
T-O-10 To safeguard the carrying capacity and safety of: i. National Roads and associated junctions in accordance with the Spatial Planning and National Roads Guidelines for Planning Authorities (DECLG, 2012) and ii. The R238 Bridgend to Buncrana Regional Road.	The proposed development safeguards road capacity and safety by providing minor road accommodations for abnormal loads, supported by traffic management and compliance with the relevant national roads guidance.
T-P-15A It is a policy of the Council for developments affecting the national road network to require the provision of Traffic and Transport Assessments in accordance with the requirements of the 'TII Traffic & Transport Assessment Guidelines (2014)' (refer to 'Requirement for Safety Audit', Chapter 16, 'Technical Standards').	The proposed development is supported by Traffic and Transport Assessment prepared in accordance with TII guidance, addressing turbine delivery movements and associated mitigation/safety measures.

Table 3-8: Donegal CDP Policies & Objectives (Natural and Built Heritage)

Policy	Compliance
WW-P-2 Protect water quality, drinking water, aquatic ecology, and comply with WFD, Habitats/Birds Directives, RBMP measures, DWSP and IFI guidelines.	The proposed development has been designed with appropriate drainage and pollution prevention measures, supported by construction controls, to protect surface water, groundwater and aquatic ecology and to avoid conflict with WFD/RBMP objectives and relevant fisheries and drinking water protection requirements.
AYH-P-1 Protect all archaeological heritage (monuments, sites, records, graveyards, towns, battlefields, underwater archaeology, settings) and Archaeological Protection Zones, requiring assessment/mitigation except where strategic infrastructure limits full application.	The proposed development has been informed by archaeological constraints review and, where necessary, archaeological assessment to protect recorded and potential archaeology and their settings. Where archaeological sensitivity is identified along the accommodations corridor, appropriate mitigation (e.g., testing/monitoring) and avoidance measures have been incorporated.
AYH-P-2 Protect existing and facilitate appropriate new public access and visitor infrastructure for archaeological heritage, where not harmful, and where consents are in place; applied as practicable for strategic infrastructure.	The proposed development does not alter access arrangements to archaeological sites; however, any accommodations near archaeological heritage have been designed to avoid effects on character/setting and to maintain traffic safety and environmental protection during construction.
AYH-P-3 Require sensitive in-situ preservation, long-term management plans, and informational signage for archaeology; applied flexibly where strategic infrastructure limits full implementation.	Where archaeological material is identified within the accommodations corridor, the proposed development provides for preservation in situ where practicable, or preservation by record under agreed mitigation and management measures, with appropriate reporting to the Planning Authority/NMS as required.
L-P-3 Safeguard coastal scenic, cultural, recreational and environmental amenities from inappropriate development, except where required for strategic infrastructure.	The proposed development comprises minor roadway accommodations and has been confined in extent.
BIO-P-1 Ensure compliance with Habitats/Birds Directives, avoid adverse effects on Natura 2000 sites or protected species, and maintain landscape features supporting ecological connectivity.	The proposed development has been subject to screening/assessment as appropriate to confirm no adverse effects on the integrity of European sites and to address protected species requirements. Linear landscape features (e.g., hedgerows, drains, watercourse margins) have been retained and protected where practicable to maintain ecological connectivity.
BIO-P-3 Protect local biodiversity features, retain and integrate them where possible, minimise hedgerow removal (only for safety), and provide biodiversity enhancements or no-net-loss plans for large projects.	The proposed development has minimised vegetation removal and retained local biodiversity features where practicable, with any hedgerow/roadside removal limited to what is necessary for road safety and turbine delivery. Reinstatement and proportionate enhancement (e.g., native planting/edge restoration) have been incorporated where feasible, consistent with the scale of the works.
BIO-P-4 Prevent introduction/spread of invasive species; require control/management plans where present.	The proposed development has included invasive species checks, a control/biosecurity approach to prevent spread through soil movement or machinery, with management measures implemented in accordance with the relevant regulations.
BIO-P-5 Prevent impacts on pollinators, require native pollinator-friendly planting and verge management consistent with the All-Ireland Pollinator Plan.	The proposed development has minimised disturbance to roadside verge habitats and has provided for reinstatement using suitable native species. Where planting/rehabilitation is

	included, it has been specified to support pollinators and aligns with the objectives of the All-Ireland Pollinator Plan for road verges.

3.5 TRANSBOUNDARY ASSESSMENT

Annex IV of the Environmental Impact Assessment Directive (2011/92/EU) as amended implements the Espoo and Aarhus Conventions in the EU, and as such mandates a description of transboundary effects (European Commission, 2025). Transboundary effects are defined as likely significant effects on the environment within the territory of another European Economic Area Member States (EEA States) (Planning Inspectorate, 2025).

At nearest distance, the proposed Wind Farm Site is located 3.6km south of the border with Northern Ireland. Accordingly, the potential for transboundary effects has been considered under the following sections of the EIAR, with the following conclusions to assessments:

Table 3-9: Transboundary Assessment and relevant conclusion

EIAR Chapter	**Conclusion**
Chapter 4 Population Human Health – Section 4.4.2	"Owing to the separation distance from the Northern Ireland border and the intervening landform, which heavily reduces both the perceived scale and spatial extent of the proposed project from receptors within Northern Ireland, the potential for transboundary landscape and visual effects is limited. Thus, transboundary effect are assessed as Not Significant."
Chapter 5 Biodiversity – Section 5.11	"while potential transboundary pathways have been identified and assessed, there are no transboundary residual effects anticipated on IEFs as a result of the Proposed Project."
Chapter 6 – Ornithology – Section 6.4.8	"the assessment concludes that the proposed project is not predicted to give rise to likely significant transboundary effects on ornithological receptors in Northern Ireland, either alone or in combination with other projects."
Chapter 7 – Land, Soils and Geology - Section 7.8	"Due to the localised nature of the proposed construction works which will be kept within the proposed development site boundary, there is no potential for transboundary effects within Northern Ireland."
Chapter 8 – Hydrology and Hydrogeology – Section 8.8	"Due to the localised nature of the proposed construction works which will be kept within the proposed development site boundary, there is no potential for transboundary effects within Northern Ireland. There will be no significant effect arising from the wind farm, TDR, or grid connection route, construction, operation, or decommissioning on any transboundary surface water or groundwater body quality or flows within Northern Ireland."

Chapter 9 – Noise and Vibration	"With regards to noise sensitive locations in Northern Ireland, the ETSU-R-97 Guidelines are pertinent as the Guidelines (DoEHLG, 2006) are not applicable in this jurisdiction. NSL reference H1249, being the closest to the border at distance of approximately 400 m from the border, has a cumulative predicted noise level of less than 24 dB L_{A90}, therefore the lowest and most conservative ETSU noise criteria are met. It follows that the proposed project does not have the potential for a significant transboundary effect."
Chapter 10 – Shadow Flicker	"The Proposed Project is located 2.6km from Northern Ireland with T1, the closest turbine, located 4.2km South-West of the border. Due to the proximity of the Proposed Project to Northern Ireland, transboundary effects have been considered. As mentioned in Section 10.2.2, the Shadow Flicker study area is defined as 1.63 km (ten rotor diameters) from the proposed turbine locations. All receptors (84 no.) within this study area have also been defined in Section 10.3.1. Given the distance from the study area, and the identified sensitive receptors within it, to Northern Ireland, transboundary effects are considered to be not significant."
Chapter 11 – Air Quality – Section 11.6.5	"There are no emissions during the construction, operational and decommissioning phases of the proposed project which have the potential for transboundary effects. The effects identified during the construction and decommissioning phases (Section 11.6.2 and Section 11.6.4) are predicted to be localised (within 250m of the proposed project). The indirect effects identified during the operational phase (Section 11.6.3.1) relate to Ireland's national NOX emission target through renewable energy production instead of fossil fuel power generation and are not applicable outside Ireland."
Chapter 12 – Climate - Section	"As discussed in Section 12.11 the impact of GHG emissions on climate are not constrained by national boundaries. The effects identified during the construction phase in Section 12.7.2.1 will negatively impact the global climate due to the release of GHG emissions. Conversely, the effects identified during the operational phase in Section 12.7.2.2 will positively impact the global climate by displacing fossil fuels for power generation and thereby reducing global GHG emissions. The GHG emission savings during the operational phase, far outweigh the emissions

	from the construction phase as discussed in Section 12.7.2.3."
Chapter 13 Landscape and Visual – Section 13.11	"it is assessed that transboundary landscape effects within Northern Ireland as a result of the proposed project are Not Significant." "the resulting visual effects are of a low order of magnitude, and residual transboundary visual effects within Northern Ireland are therefore assessed as Not Significant."
Chapter 14 Cultural Heritage – Section 14.4.6	"No elements of the Proposed Project are located within Northern Ireland, and therefore there will be no transboundary direct effects on any archaeological, architectural or cultural heritage sites located in Northern Ireland."
Chapter 15 – Material Assets – Section 15.7	"No transboundary effects related to the proposed project are expected. As stated above, the proposed project will not result in any significant effects in relation to aviation, telecommunications and utilities. As the project progresses the applicant is responsible for continued engagement with relevant stakeholders. In the event of any impact the Applicant is responsible for ensuring that the necessary mitigatory measures are in place."
Chapter 16 Traffic and Transportation – Section 16.8.3.6	"A review of relevant planning applications and permitted developments within the Northern Ireland jurisdiction at the time of assessment has not identified any developments of sufficient scale or proximity that would result in significant transboundary or cumulative effects when considered in combination with the proposed development. Accordingly, no likely significant transboundary effects are anticipated in respect of this topic. It is expected that no part of the Northern Ireland road network will be utilised for the Proposed Project."
Chapter 17 Major Accidents – Section 17.8	"At its nearest distance, the proposed Wind Farm Site is located 3.6km south of the border with Northern Ireland. Accordingly, the potential for transboundary effects has been considered, where necessary. As outlined in Table 17-7, with all mitigation measures implemented there are no significant effects anticipated from the proposed project in relation to the risk of major accidents and/or natural disasters, and therefore there is no significant transboundary effects anticipated."

4. NEED FOR THE DEVELOPMENT

The need for the proposed development is driven by the following factors:

- Ireland is legally bound under international agreements such as the Kyoto Protocol and the Paris Agreement to reduce its greenhouse gas (GHG) emissions. These commitments are reinforced by EU climate legislation such as the Renewable Energy Directive. At national level, the Climate Action and Low Carbon Development (Amendment) Act 2021 commits Ireland to a 51% reduction in GHG emissions by 2030, relative to 2018 levels, and to climate neutrality by no later than 2050. The proposed 77-100.8 MW development will contribute directly to these obligations by displacing fossil fuel-based electricity generation with clean, renewable energy;
- Ireland is not currently on track to meet its 2030 binding climate targets. The EPA's latest projections indicate that, under currently implemented measures, Ireland would achieve only a 10% reduction in emissions on 2005 levels in sectors covered by the Effort Sharing Regulation, against a binding target of at least 42% by 2030. The EPA also projects that Ireland is off track to achieve the national economy-wide target of a 51% reduction in GHG emissions by 2030, relative to 2018 levels. In that context, additional renewable electricity generation is required at scale, and the proposed development will make a meaningful contribution to closing that gap.[13]
- Ireland's energy system is heavily reliant on imported fossil fuels, particularly natural gas from the UK and continental Europe. This dependency exposes the country to geopolitical risks, price volatility, and supply disruptions. The government's strategy document, Ireland's Transition to a Low Carbon Energy Future 2015–2030, emphasizes the need to enhance energy independence through domestic renewable energy development. The proposed development contributes to this goal by harnessing Ireland's abundant wind resources, thereby improving energy resilience and reducing import dependency;
- A requirement to increase Ireland's national energy security arises as set out in *Ireland's Transition to a Low Carbon Energy Future 2015–2030* and subsequent climate and energy policy. Ireland's energy system remains heavily reliant on imported fossil fuels, particularly natural gas, which exposes the State to geopolitical risk, fuel price volatility and supply disruption. The proposed development will harness an indigenous renewable resource and thereby strengthen security of supply, improve system resilience and reduce reliance on imported fuels;[14]
- Provision of cost-effective power production for Ireland which would deliver local benefits such as employment and expenditure during the construction and operational phases, investment opportunities in the local area, and a community benefit fund for the lifetime of the wind farm;

[13] Indicators / targets | Environmental Protection Agency

[14] Long-term Strategy on Greenhouse Gas Emissions Reductions

- Ireland's electricity prices are among the highest in the EU, partly due to its reliance on imported gas. Global market fluctuations such as those seen during the 2022 energy crisis can lead to sharp price increases. By expanding domestic wind generation, the proposed development helps stabilize energy prices, reduce exposure to global fuel markets, and protect consumers and businesses from future shocks;
- Ireland faces a significant electricity shortfall, with over 4 GW of additional capacity needed to meet projected demand and climate targets. The Climate Action Plan 2024 (CAP24) and CAP25 set a target of 9 GW of onshore wind capacity by 2030. As of the end of 2024, only 4.8 GW was installed (Wind Energy Ireland). This leaves a gap of 4.2 GW to be filled within five years. The proposed development is essential to closing this gap, ensuring grid reliability, and enabling the electrification of sectors such as transport and heating; and
- To achieve the 9GW onshore wind capacity target by 2030, the Revised NPF mandates regional renewable energy capacity allocations, requiring each Regional Assembly to plan for specific contributions. The Northern and Western Region has energised onshore wind capacity of 1,761 MW as of 2023 and was allocated an additional 1,389 MW to be developed by 2030. This represents 35% of the national onshore wind target. The proposed project would contribute between 5.5% and 7.3% of the Northern and Western Regions 2030 target.

5. SUMMARY

The proposed Lissinagroagh Wind Farm represents a strategically important renewable energy development that aligns with Ireland's national and EU climate obligations, energy security goals, and planning policy frameworks. With a proposed capacity of between 222,952 and 291,393 MWh, the proposed development will generate clean electricity for over 52,998 and 69,379 households annually, significantly reducing reliance on imported fossil fuels and contributing to Ireland's legally binding target of achieving net-emissions by 2050.

There are significant International, European, National and Local policy supports for renewable energy technologies in the country. Ireland is not currently on track to meet its legally binding 2030 greenhouse gas emissions reduction targets, with the EPA projecting that emissions reductions by 2030 will fall materially short of the 51% target set under national climate legislation.

Europe's 2050 targets mean that energy production will have to be almost carbon-free by that time. While Ireland has made some progress in the provision of renewable energy generation in recent years, it is still failing to meet legally binding targets. These target commitments, and energy and environmental policy and legislation demonstrate a need for increased renewable energy production in Ireland.

Onshore wind is a central pillar of Ireland's decarbonisation strategy in the short, medium and long term. Onshore wind energy is critically important to Ireland because it is the State's largest source of renewable electricity and is central to meeting the national target of **9 GW of onshore wind by 2030** under Climate Action Plan 2025. Ireland had **4,836 MW of installed onshore wind capacity at the end of 2024**, so substantial further onshore wind development is required to meet climate, energy security and electricity system needs.

As a small island nation, the challenges are to deliver a secure supply of energy to meet our growing needs and drive economic prosperity, while making sure cost is at the forefront of decision-making, alongside reducing CO_2 emissions to protect the environment and limit the impact of climate change for future generations.

Ireland is one of the top 20 countries in its use of wind energy worldwide[15]. Under CAP25, the Irish government continues to aim for 80% renewable electricity by 2030. Wind energy provides a clean, sustainable solution to our energy problems. It can be used as an alternative to fossil fuels in generating electricity, without the direct emission of greenhouse gases.

The benefits of wind power are considered to be many and these can be summarised as follows:

- Wind energy releases no pollution into the air or water;
- Wind energy is both renewable and sustainable. The wind will never run out, unlike the earth's fossil fuel reserves (such as oil and gas);
- Adding wind power to the energy supply diversifies the national energy portfolio and reduces reliance on imported fuels;

[15] Wind Power by Country 2025. Accessed on 1st May 2025.

- Wind turbines have a relatively small footprint;
- Wind turbines are considered relatively low maintenance;
- The wind energy sector protects consumers from continued volatility in the gas sector. A recent Wind Energy Ireland news article[16]stated that, ''spending on gas for electricity in Ireland was cut by almost one billion euro last year, as wind energy supplied 32 per cent of Ireland's electricity''; and
- Energy in Ireland 2024 Report[17] published by the SEAI has indicated that wind energy accounted for c.82.7% of renewable electricity generated in Ireland in 2023. The CO_2 intensity of electricity generation fell to a historic low in 2020, before increasing slightly in 2021 due to an increase in emissions from coal and, to a lesser extent, oil. The CO_2 intensity fell again in 2023, which was driven by a reduction in the proportion of oil and coal within the energy generation mix.

At the EU level, the proposed development is supported by the Renewable Energy Directive (RED III) and the European Green Deal, all of which emphasise the urgent need to expand renewable energy capacity. These instruments establish a rebuttable presumption that renewable energy projects are of overriding public interest when balancing the legal interests in an individual case and mandate streamlined permitting processes. Ireland's obligations under these frameworks are legally binding and increasingly urgent, given its current underperformance in emissions reduction and renewable energy deployment. The relevant provisions of RED III have recently been transposed in Ireland through the European Union (Planning and Development) (Renewable Energy) Regulations 2025.

At a national level, the proposed development complies with CAP24 and CAP25 as it contributes to the binding renewable energy target of achieving 80% renewable electricity by 2030 and increasing the capacity of onshore wind in Ireland. It also contributes to the reduction of greenhouse gas emissions within the electricity sector with knock on effects on other sectors as well, thus having an overall impact on limiting emissions within sector wise ceilings set within CAP24 and CAP25. In addition, the proposed development is aligned with the objectives of RSES for the Northern and Western Region. Providing between 5.5% and 7.2% of the associated 2030 onshore wind capacity target for the region.

The Climate Action and Low Carbon Development Act 2015 (as amended) has set a target of a 51% reduction in the total amount of greenhouse gases over the course of the first two carbon periods ending 31 December 2030 relative to 2018 annual emissions. The 2021 Climate Action and Low Carbon Development Act, defines the carbon budget as 'the total amount of greenhouse gas emissions that are permitted during the budget period'.

[16] Wind energy saved Ireland over €1.2 billion on gas in 2024

At a local level, the proposed development is situated on lands designated as 'available areas' for new wind farm development, with the exception of turbines no. 11 and 12, which are located immediately west of this area and in lands with no specific zoning designation.

The proposed development is compliant with the policies and objectives of the Leitrim County Development Plan 2023-2029, such as Objectives RE POL 1, RE POL 2 and RE OBJ 1 which all aim to reduce carbon emissions and greenhouse gases via increasing renewable energy share. The proposed wind farm also aligns with Leitrim CDP's designations for available areas for windfarm development which are set forth in Leitrim's Renewable Energy Strategy (RES). The proposed Turbine Delivery Route will encompass minor road works, which comply with the policy and objectives of the Leitrim, Sligo and Donegal County Development Plans.

The proposed development has been designed to comply with all relevant European Directives, including the EIA, Habitats, and Birds Directives, and is supported by a comprehensive Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS), and Construction Environmental Management Plan (CEMP). These documents demonstrate that the development will not adversely affect designated Natura 2000 sites, protected species, or sensitive habitats or give rise to any significant effects on the environment. Mitigation measures such as clear span bridges, and buffer zones have been incorporated to protect watercourses and biodiversity. The site layout also ensures compliance with noise, shadow flicker, and visual impact guidelines, maintaining a minimum setback of over 760 metres from residential properties, exceeding the requirements of both the 2006 and Draft 2019 Wind Energy Development Guidelines.

The proposed development will have several significant long-term and short-term benefits for the local economy including job creation, provision of a community benefit fund estimated to be worth approximately € 12.5 million over the lifetime of the project, and local authority commercial rate payments. In addition, during construction, additional employment will have been created in the region through the supply of services and materials to the development. In conjunction to this, there will also be income generated by local employment from the purchase of local services i.e., travel and lodgings.

It is respectfully submitted that planning permission should be granted in recognition of the proposed development's strategic importance and alignment with EU and national obligations, as well as regional and local policy alignment.

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