

2. BACKGROUND TO THE PROSPECTIVE DEVELOPMENT

This chapter of the Environmental Impact Assessment Report ('EIAR') presents information on the European, National, Regional and Local Planning climate change and renewable energy policies and targets, related to the Subject Development (that includes the Prospective Development) and should be read in conjunction with the Planning Report which accompanies the planning application. This chapter also sets out relevant planning history, summaries EIA scoping and consultations undertaken, as well as setting out the nature of the cumulative impact assessment process undertaken.

2.1 Introduction

Key definitions used herein are described in Chapter 1: Introduction of the EIAR. As detailed in Section 1.1.1 in Chapter 1 of this EIAR/rEIAR, the various development components are described and assessed using the following references: 'Subject Development', 'Existing Development', 'Prospective Development', 'Permitted Development', 'Site', 'Wind Farm Site', 'Grid Connection Site', 'BMEP Site', 'Grid Connection', 'November 2020 Peat Slide', '2017 EIAR' and 'proposed turbines' or 'proposed turbine locations'

The Subject Development, including the Existing Development for which substitute consent is being sought, and the Prospective Development for which permission is sought to complete the partially built wind farm, relates to all parts of the Meenbog Wind Farm. Please see Section 1.1.1 of this rEIAR for further details. A detailed description of the Existing Development is provided in Chapter 4 (Description of the Existing Development) of this rEIAR.

The Wind Farm Site is located within a rural, agricultural setting in County Donegal approximately 8 km southwest of the twin towns of Ballybofey and Stranorlar and approximately 12 km northeast of Donegal Town at its nearest point. The Grid Connection Site extends southwest from the Wind Farm Site for approximately 6 km along the N15 National Road towards Donegal Town before exiting the N15 to the southeast and following Local Roads, adjacent agricultural land and private access track to the Clogher 110kV substation. The BMEP Site is comprised of two parcels of land consisting of coniferous forestry and associated forestry access tracks. The BMEP Site is located in the townland of Tievecloghoge and comprises two land parcels, referred to as Parcel 1 (to the east) and Parcel 2 (to the west). Parcel 2 is located approximately 2.3km east of the Wind Farm Site, and Parcel 1 is located approximately 4.2km east of the Wind Farm Site.

Current land-use along the Grid Connection comprises of public road corridor and private track. Land-use on the wider landscape comprises a mix of pastoral agriculture, peatlands, commercial forestry, low-density residential, and small-scale commercial properties. Existing access to the Wind Farm Site is from the N15 National Road in the northwest of the Site, and a secondary Site entrance from L-6554 Local Road to the north of the Site. The N15 National Road runs south-west to north-east with the Site approximately 2km east. The Grid Connection Site extends from the Wind Farm Site entrance along the N15 National Road to the L-2595 Local Road, then proceeds to the L-1985 Local Road where it travels east along the road and through agricultural lands parallel to the Local Road before continuing along the L-19852 Local Road and finally following a private road to reach the Clogher 110kV substation. Access to the BMEP Site is via the L-2974 Local road, along which the western block site entrance is located.

The Prospective Development comprises the completion of a wind farm which will generate electricity for export onto the national grid. The need to decarbonise and reduce emissions has always been imperative, however, in recent years the urgency involved has become clearer to all stakeholders. The Climate Action Plan (CAP) first published by the Government in 2019, and updated in 2021, 2023, 2024 and 2025 sets out a roadmap to halve emissions by 2030 and reach net zero no later than 2050.

Central to this is the set of measures set out to increase the proportion of renewable electricity to up to 80% by 2030 and a target of 9GW from onshore wind. The CAP places front and centre the facts that without urgent action, global warming is likely to be more than 2° C above pre-industrial levels by 2060, with ‘devastating’ impacts on nature and ‘irreversible changes to many ecosystems’ arising.

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

The primary driver behind the Meenbog Wind Farm (which permission for the Prospective Development will allow to complete) is the need to provide additional renewable energy to offset the use of fossil fuels within the electricity generating sector. In the context of the current energy and climate crisis, it is deemed environmentally prudent to utilise existing wind farm infrastructure, i.e. the existing onsite 110kV substation and existing wind farm access roads, rather than allowing this infrastructure to become redundant. The Prospective Development represents an opportunity to complete a partially built wind farm and provide an estimated installed capacity of 91.2MW of clean, renewable electricity to the national grid, which will contribute towards achieving further decarbonisation of Ireland’s electricity generation sector.

The **Prospective Development** consists of the provision of the following:

- *19 no. wind turbines, with an overall tip height of 156.5m, rotor diameter of 133m, and wind turbine hub height of 90m, and 1 no. meteorological mast with a height of 80m, and subsequent decommissioning of the wind turbines and meteorological mast, following a twenty five-year operational period from the date of full commissioning of the wind farm;*
- *The completion of upgraded access junctions, tracks and roads, and construction of new site access roads;*
- *The completion of construction of all 19 no. wind turbine foundations and hardstand areas, and the construction of a meteorological mast foundation;*
- *Completion of internal wind farm underground ducting and cabling;*
- *Continued use of and upgrade of 2 no. temporary construction compounds (including 3 no. temporary site offices with a combined floor area of 121.5 sqm);*
- *Continued use and extraction at the 3 no. borrow pits;*
- *Peat and spoil management, including site landscaping;*
- *Forestry felling;*
- *Site drainage and sediment control measures;*
- *Biodiversity enhancement measures (including peatland habitat restoration and Hen Harrier habitat areas);*
- *Recreation and amenity works (including carpark, play, picnic & amenity areas and pedestrian access paths to the wind farm roads);*
- *Operational stage site signage; and*
- *All associated site development works.*

The applicant is seeking an operational period of twenty-five-years for the wind turbines, meteorological mast and site signage from the date of full commissioning of the wind farm. Permanent planning permission is being sought for all other works.

2.1.1 Statement of Authority

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

This chapter was prepared by Sean McCarthy and Evelina Sadauskaite, with support from Katie Fleming.

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

Evelina Sadauskaite is a Project Planner at MKO, who has over 4 years of experience in private practice. Evelina holds a MSc in Planning & Development from Queens University Belfast. Evelina has experience across a range of sectors including in the commercial, residential, industrial and renewables sectors. Evelina's key strengths and areas of expertise are in development management, provision of planning advice, and project management. Evelina has acted as Planning Lead on various projects including Strategic Infrastructure Developments, managed lodgement of Planning Applications, Development Plan Submissions and preparation of Development Feasibility Reports.

Katie Fleming is a Planner with MKO, who has over 2 years of experience in private practice. Katie holds a MA (Hons) in Planning & Development from University of Galway. Since joining MKO, Katie has been involved in a range of sectors including in the commercial, residential, industrial and renewables sectors. Katie's main responsibilities include preparing planning application documents and reports, preparing inputs for Environmental Impact Assessment Reports and liaising with multidisciplinary project teams.

This chapter was reviewed by Sean Creedon. Sean is an Associate Director in the Environment Team at MKO. He oversees a team of highly skilled environmental professionals working on EIAR for large- and medium scale Renewable Energy infrastructure. Sean has directed and overseen multiple renewable energy projects across wind, solar, battery, biogas and hydrogen as well as a range of thermal and other energy related developments. He has worked on the planning and environmental impact elements within all stages of wind farm project delivery. He is a member of the MKO senior management team responsible for developing the business, mentoring team members, fostering a positive culture and promoting continuous employee professional development. Sean has over 23 years' experience in program and project development, holds an MSc from NUI Galway and a Diploma in Project Management from Institute of Project Management Ireland.

2.1.2 Difficulties and Limitations

The most recent available data as of June 2026 was used for Section 2.8 and of this Chapter and Appendix 2-1 of the EIAR to undertake the planning search.

2.2

Planning Analysis

The following policy and analysis section sets out the relevant international, national, regional, and local planning policy and legislation as it relates to renewable energy, climate change and related development. It is important to note that the Prospective Development relates to works which are necessary to complete and operate the Meenbog Wind Farm which comprises of a vital renewable energy project. The Permitted Development was granted planning permission in 2018 and as such the principle of wind energy development at the Wind Farm Site has been established.

Although the Subject Development is now located within an area designated as ‘Not Normally Permissible’, it remains open to consideration under the current policy framework, as the development is under construction and substantive works have already been completed on the Site. The Subject Development, to which this planning application relates, is therefore considered to align with this policy support, particularly in the context of a previously consented wind energy project that is partially constructed.

2.2.1

Renewable Energy Resources

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

A gradual shift towards increasing Ireland’s use of renewable energy is no longer viable. There is an urgency now to ensure real changes occur without delay. Renewable energy development is recognised as a vital component of Ireland’s strategy to tackle the challenges of combating climate change and ensuring a secure supply of energy. Ireland is heavily dependent on the importation of fossil fuels to meet its energy needs. In 2023, over 81% of Ireland’s energy was imported from abroad, higher than the European Union (EU) average of almost 60% (National Energy Security Framework, 2022)¹. This high dependency on energy imports is highly risky, and Ireland is currently extremely vulnerable both in terms of meeting future energy needs and ensuring price stability. As such, expanding indigenous renewable energy supply is critical for energy security and price stability.

The regularisation of the planning status of the Existing Development, together with permission for the Prospective Development will facilitate the timely completion of the Meenbog Wind Farm and will therefore contribute to meeting Ireland’s national and EU renewable energy and carbon emission reduction goals.

2.2.2

Need for the Prospective Development

Ireland’s Climate Action Plan 2025 sets ambitious yet essential targets for renewable energy, including 9GW of onshore wind capacity by 2030 with at least 6GW to be delivered by 2025 and an 80% share of renewable electricity by the same year. However, multiple assessments, including the Climate Change Advisory Council (CCAC) Annual Review 2025 and the Environmental Protection Agency (EPA) emissions projections, confirm that Ireland is not on track to meet these targets. Significant gaps remain in renewable energy deployment, particularly in grid capacity expansion, as well as onshore and offshore wind energy development, while continued reliance on fossil fuels threatens national and EU climate commitments.

¹ Department of Climate, Energy and the Environment. (2022). National Energy Security Framework (Pub. April 13, 2022; Updated June 10, 2025). Government of Ireland. <https://www.gov.ie/en/departments-of-climate-energy-and-the-environment/publications/national-energy-security-framework/>

Failure to meet binding EU targets will expose Ireland to financial penalties, increased carbon credit costs, and continued dependence on fossil fuel imports—posing serious risks to energy security and economic stability. Furthermore, Ireland’s national interest, as outlined in Section 143(1) of the Planning and Development Act, 2000, as amended (the Act), requires the rapid expansion of renewable energy, making this a matter of strategic economic and social importance.

Every viable renewable energy project plays a crucial role in meeting Ireland’s climate targets. The approval of well-planned, appropriately located renewable energy projects, such as the Subject Development is not just beneficial—it is imperative. As the Subject Development is partially completed, it is uniquely positioned to contribute to the 2030 target for onshore wind capacity. Without decisive action to facilitate renewable energy deployment, Ireland risks missing national and EU commitments, incurring financial penalties, and undermining energy security.

Please see Section 1.5 of Chapter 1: Introduction of this EIAR for further information on the need for the Prospective Development.

2.3

Climate Change Policy and Targets

International and national policy consistently identifies the need to reduce GHG emissions and stresses the importance of reducing global warming. The context of international policy has altered over the last 30-years from being of a warning nature to the current, almost universally accepted belief, that there is a climate change emergency occurring both within Ireland and at a broader global scale. The Intergovernmental Panel on Climate Change (IPCC)’s Sixth Assessment Report² published in 2021 provides a stark assessment of global climate change and presents evidence that climate changes will increase in all regions of the globe over the coming decades and that much of the damage caused by climate change up to this point is now likely irreversible, such as the rise in sea levels over the course of the 21st century. The World Meteorological Organisation (WMO) report ‘*State of the Global Climate 2024*’, published in March 2025, states that the year 2024 was the warmest year on observational record, with temperatures exceeding 1.5 degrees above pre-industrial levels³. On the 14th January 2026, the WMO issued a press release confirming that 2025 was one of the three warmest years on record, continuing a pattern of the last eleven years having been the eleven warmest on record⁴.

“*The Status of Ireland’s Climate 2020*” produced by MET Éireann⁵, similarly reflects on clear and distinct impacts arising from climate change effects within an Irish context:

Greenhouse gas emissions continue to rise:

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

Annual average amounts of precipitation are increasing:

- Annual precipitation was 6% higher in the period 1989 to 2018, compared to the 30-year period 1961 to 1990. The decade 2006 to 2015 was the wettest on record.

Annual average air temperature is rising:

² Climate Change 2021 ‘The Physical Science Basis’ (Intergovernmental Panel on Climate Change, August 2021)

³ State of the Global Climate 2024 (World Meteorological Organisation, March 2025)

⁴ <https://wmo.int/news/media-centre/wmo-confirms-2025-was-one-of-warmest-years-record>

⁵ Climate Status Report for Ireland 2020 (Environmental Protection Agency, Marine Institute, Met Éireann, August 2021)

- The annual average surface air temperature in Ireland has increased by approximately 0.9°C over the last 120 years, with a rise in temperatures being observed in all seasons.
- An increase in the number of warm spell days the last 60 years with very little change in cold spell duration.

Sea level continues to rise:

- Satellite observations indicate that the sea level around Ireland has risen by approximately 2-3mm/year since the early 1990s. Analysis of sea level data from Dublin Bay suggests a rise of approximately 1.7mm/year since 1938 which is consistent with global average rates.

The ocean is becoming more acidic:

- Measurements in the surface waters to the west of Ireland between 1991 and 2013 indicate an increase in ocean acidity which threatens calcifying species such as corals, shellfish and crustaceans.

The ocean is getting warmer:

- The average sea surface temperature at Malin Head over the 10 years between 2009 and 2018 was 0.47°C above the 1981-2010 mean.

There is an increase in river flows across most of the country:

- Data analysis from the last 50 years identifies an increase in the magnitude of the river flows across most of the country
- There is evidence in more recent years of an increase in potential drought conditions especially in the east.

The area of forests and artificial surfaces has increased:

- Land cover observations since 1990 show increases in the area covered by both artificial surfaces and forests and a decrease in wetland areas which include peatlands. There was an increase of 38% in the volume of trees between 2006 and 2017.

In 2025, Met Éireann issued the “*Annual Climate Statement for 2025*”⁶, provided an update on the impact that climate change is having on the Irish climate:

- 2025 was the warmest year on record in Ireland since 1900, and the second warmest year on record.
- The last 4 years (2022-2025) are now the 4 warmest years on record.
- Rainfall data suggests 2025 was the 15th wettest year since 1941.

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

⁶ Published 6th January 2026

2.3.1 International Climate Policy

United Nations Framework Convention on Climate Change

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

Kyoto Protocol

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

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

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

Under the Protocol, countries must meet their targets primarily through national measures, although market-based mechanisms (such as international emissions trading) can also be utilised. An annual Conference of Parties (COP) has been established building upon the Protocol, with the Paris Agreement (COP21) shifting the focus to all countries not just developed nations.

COP21 Paris Agreement

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

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

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

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

An article published by the IPCC on the 6th of October 2018 titled '*Global Warming of 1.5°C*', notes the impacts of global warming of 1.5°C above pre-industrial levels and related global GHG emission pathways; in the context of mitigation pathways, strengthening of the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty. This special report is part of an invitation contained in the Decision of COP21 of the UNFCCC to adopt the Paris Agreement and provides an update on the impact of climate change if emissions are not reduced.

COP25 Madrid

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

COP26 Glasgow

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

The key items COP26 seeks to achieve are:

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

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

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

ever commitment of public funds for forest conservation and a global roadmap to make 75% of forest commodity supply chains sustainable.

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

COP27 Sharm el-Sheik

COP27 took place in Sharm el-Sheikh, Egypt from the 6th of November to the 20th of November 2022. The COP is a supreme decision-making body of the UNFCCC. COP 27 centred around three major topics:

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

COP27 officially ended on the 18th of November, but due to the nature of negotiations an outcome text and the final press conference was not held until November 20th. The first outcomes of the negotiations of the COP27 agenda were seen in the first draft document. A consolidated final document followed and while it removed much of the vague wording of the draft, it also removed some critical key points, particularly in relation to the strengthening of actions required by developed nations. The most significant outcomes from COP27 are outlined below:

- **Phase down/out language:** The final agreement contains a commitment to a 'phase down' of coal use, as opposed to a wider commitment to phase out all fossil fuels.
- **1.5°C Pathway:** The 1.5°C warming limit has been retained, and reassurances have been made that there is no room for backsliding.
- **Climate Finance & Loss and Damage:** There has been the launch of an initiative by the V20 and G7 known as the Global Shield Against Climate Risk (GSACR). The intention of this initiative has been framed almost as an insurance policy backed by the World Bank to prepare and protect those most vulnerable to climate change disasters.

COP28 Dubai

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

- Adoption of enhanced climate commitments and targets by participating countries, aimed at limiting global temperature rise to 1.5 degrees Celsius above pre-industrial levels.
- Development of mechanisms and strategies for implementing these commitments, including the mobilisation of financial resources to support developing nations in their climate mitigation and adaptation efforts.
- Advancing the implementation of the Paris Agreement, with a focus on transparency, accountability, and reporting of progress.
- Accelerating the global transition to clean, renewable energy sources and phasing out fossil fuel subsidies.

- Promoting nature-based solutions and conservation efforts to mitigate climate change and preserve biodiversity.
- Addressing the impacts of climate change, such as adaptation measures for vulnerable communities and sectors.
- Collaborating on international climate finance mechanisms, carbon pricing, and technology transfer to support climate action globally.
- Strengthening international partnerships and cooperation to foster shared responsibility and collective action in addressing climate change.

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

COP29 Baku

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

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

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

COP30 Belém

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

- Launch of the ‘Global Implementation Accelerator’, a voluntary initiative designed to support rapid, high-impact interventions. It creates a structured space for countries to receive technical support, identify barriers, and coordinate investment strategies. Its remit covers a wide spectrum of mitigation and adaptation priority areas, including renewable energy deployment, battery storage, methane reduction, digital grid management, and crucial nature-based interventions.
- Through the Belém Package, Parties committed to accelerating “zero- and low-emission technologies” in hard-to-abate sectors such as industry, transport and power.
- COP 30's redefined Action Agenda included 117 ‘Plans to Accelerate Solutions’ (PAS) across sectors, many of which target low-carbon energy, industrial decarbonization, and clean system deployment.
- COP30 set a long-term ambition to mobilise USD 1.3 trillion annually by 2035 for climate action. This finance is intended to help scale clean energy infrastructure (such

as renewables, storage and grid infrastructure), support adaptation, and enable just transitions.

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

European Green Deal – European Climate Law (2021)

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

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

The European Climate Law⁷ writes into law the objectives set out above in the European Green Deal for Europe’s economy and society to become climate-neutral by 2050. Climate neutrality by 2050 means achieving net zero GHG emissions for EU countries as a whole, mainly by cutting emissions, investing in green technologies and protecting the natural environment. The Climate Law includes:

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

The law aims to ensure that all EU policies contribute to this goal and that all sectors of the economy and society play their part. All 27 no. EU Member States have committed to turning the EU into the first climate neutral continent by 2050. One third of the 1.8 trillion-euro investments from the Next Generation EU Recovery Plan, and the EU’s seven-year budget, will finance the European Green Deal. On 14th July 2021, the European Commission adopted a set of proposals⁸ to make the EU’s climate, energy, transport and taxation policies fit for reducing net GHG emissions by at least 55% by 2030, compared to 1990 levels.

⁷ European Climate Law was published in the Official Journal on 9th July 2021 and came into force on 29th July 2021.

⁸ ‘Fit for 55’: delivering the EU’s 2030 Climate Target on the way to climate neutrality (July 2021).

Achieving these emission reductions in the next decade is crucial to Europe becoming the world's first climate-neutral continent by 2050. This milestone will only be achieved through the permitting and construction of renewable energy projects, such as the Subject Development.

2.3.1.2 Compliance with International Climate Policy

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

The Subject Development is also considered to be in line with the European Green Deal, and European Climate Law, which also aims to reduce carbon emissions and achieve net zero carbon emissions by 2050. These goals will not be met if projects, such as the Subject Development, are not implemented.

The regularisation of the planning status of the Existing Development, together with permission for the Prospective Development will facilitate the timely completion of the Meenbog Wind Farm which will ensure that development progresses and generation of renewable energy takes place at the Site, thus being wholly in line with the goals and targets outlined and would also aid in ensuring energy security within the EU which is a target of the European Green Deal. As wind is an indigenous and abundant resource, countries can tap into their own wind potential, reducing the vulnerability to price fluctuations and geopolitical risks associated with fossil fuel imports.

2.3.2 National Climate Change Policy

Programme for Government – Securing Ireland's Future (January 2025)

The Programme for Government 2025 – Securing Ireland's Future (January 2025) places specific emphasis on climate change, recognising that time is critical in addressing the climate crisis. The Programme states that the Government is committed to taking *“decisive action to radically reduce our reliance on fossil fuels and to achieve a 51% reduction in emissions from 2018 to 2030, and to achieving net-zero emissions no later than 2050”*.

The Programme states that the next ten years are a critical period in addressing the climate crisis, and therefore, a deliberate and swift approach to reducing more than half of Ireland's carbon emissions over the course of the decade (2020-2030) must be implemented. The programme states that the Government are committed to reducing GHG emissions by an average 7% per annum over the next decade in a push to achieve a net zero emissions by the year 2050.

With regard to renewable energy generation, the Programme notes that the Government is committed to the rapid decarbonisation of the energy sector. The Programme states the Government's ongoing support and commitment to take *“the necessary action to deliver at least 70% renewable electricity by 2030”*. This target has been updated by subsequent Climate Action Plans.

Climate Action and Low Carbon Development (Amended) Act 2021

The Climate Action and Low Carbon Development (Amendment) Act 2021 ('the Climate Act') legally binds Ireland to achieve net-zero emissions no later than 2050, and to a 51% reduction in emissions by the end of this decade.

The Climate Act provides the framework for Ireland to meet its international and EU climate commitments and to become a leader in addressing climate change. As indicated by the premise of the legislation, the reduction of emissions is a key proponent of the Climate Act and incorporates the following key provisions:

- Embeds the process of setting binding and ambitious emissions-reductions targets in law;
- Provides for a national climate objective, which commits to pursue and achieve no later than 2050, the transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy;
- Provides that the first two five-year carbon budgets proposed by the Climate Change Advisory Council should equate to a total reduction of 51% over the period to 2030, relative to a baseline of 2018;
- The role of the Climate Change Advisory Council has been strengthened;
- The government must adopt carbon budgets that are consistent with the Paris Agreement and other international obligations;
- Actions for each sector will be detailed in the Climate Action Plan which must be updated annually; and
- Local Authorities must prepare individual Climate Action Plans which will include both mitigation and adaptation measures and will be updated every five years.

Under Section 15 of the Climate Act, public bodies are obliged to, in so far as practical, perform their functions in a manner consistent with the latest Climate Action Plan, the National Energy & Climate Plan 2021 – 2030, and other national climate mitigation and adaptation plans. Donegal County Council (DCC), as a public body with consenting functions, must comply with this obligation in determining the Subject application.

The Subject Development will supply approximately 91MW of renewable electricity to the national grid, which represents a significant opportunity to contribute to the 51% reduction in emissions being sought, which is outlined above as a legally binding requirement. The Prospective Development, a fundamental and necessary component of the Subject Development, is therefore considered compliant with the relevant policies and objectives set out at both the European (e.g. European Green Deal) and national tiers of governance in this regard.

Carbon Budgets

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

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

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

Section 6C of the Climate Act provides that the Minister shall prepare, within the limits of the carbon budget, the Sectoral Emissions Ceilings. These ceilings set out the maximum amount of GHG emissions that are permitted in each sector. The Government approved Sectoral Emissions Ceilings on 28th July

2022. The electricity sector is allocated a sectoral ceiling of 40 MtCO₂eq for the first budget (2021-2025) and a sectoral ceiling of 20 MtCO₂eq for the second budget period (2026-2030). In 2024, electricity sector emissions were reported to be 6.3 MtCO₂eq⁹.

The Environmental Protection Agency (EPA) reported in May 2025¹⁰ that the first two carbon budgets (2021-2030) – which aim to support the achievement of the 51% emissions reduction target - would not be met. In regard to the first carbon budget, it is projected that it will be exceeded by 12 Mt CO₂eq in the ‘With Existing Measures (WEM)’ scenario and by 8 Mt CO₂eq in the ‘With Additional Measures (WAM)’ scenario. Section 6D – paragraph 5 – of the Climate Act states that non-achievement of the first carbon budget would see the excess emissions carried forward into the second budget period and the second carbon budget would be reduced by that amount. If this occurs this would make achievement of the second budget substantially more difficult. Taking into account the projected excess from the first carbon budget, it is projected that the second carbon budget will be exceeded by 114 MtCO₂eq in the WEM scenario and 77 MtCO₂eq in the WAM. As a result of this, it is stated that “*far higher emissions cuts will be needed to comply with Budget period 3 and subsequent carbon budgets*”.

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

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

In March 2019, the Joint Committee on Climate Action Change released a report detailing a cross party consensus for action. In 2019 there was already concern that Ireland’s performance in meeting international and national obligations was poor, and concern remained regarding emission projections the ability to meeting 2030 targets under relevant EU Directives.

The report states that the transformation of Ireland’s energy system will be required for the country to meet its future 2030 and 2050 GHG emission targets; specifically, in order to reach net zero emissions by 2050, Ireland will be required to fully decarbonise electricity generation. Therefore, there is a clear incentive for developing, and safeguarding, Ireland’s capacity in renewable energies and renewable electricity. Since this report was published, the Climate Act has been enacted and there have been recent progress / future scenario assessments (e.g. EirGrid’s ‘*All Island Generation Capacity Statement 2022 – 2031*’ (October 2022)).

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

Climate Action Plan 2023

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

⁹ Climate Change Advisory Council Annual Review 2025 (April 2025)

<https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR2025-Electricity-FINAL.pdf>

¹⁰ [Ireland’s Greenhouse Gas Emissions Projections 2023-2050](#), EPA, May 2025

A target aims for a reduction in emissions of 51% over the period 2018 to 2030 and in doing so, prevent / mitigate the potentially devastating consequences of climate change on Ireland's environment, society, economy and natural resources. CAP23 states that to do so, Ireland must harness the untapped indigenous renewable resources and has a target of achieving 80% of energy being produced from renewable sources by 2030 (unchanged from the previous Climate Action Plan, 2021) with a target of 9GW of that being produced by onshore wind. Measures set out in CAP23 to achieve these targets include to 'accelerate and increase the deployment of renewable energy to replace fossil fuels' (Section 12.1.4 of CAP23). It is clear from the message and ambition of CAP23 that the drive to deploy renewable energy projects such as the Subject Development in Ireland are critical to achieving the aims and objectives of CAP23 including the 9GW of onshore wind energy by 2030 and carbon neutrality by 2050.

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

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

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

Chapter 12 of CAP 23 sets out the state of play, targets and actions for the decarbonisation of the electricity sector. Carbon emissions from electricity have fallen by 45% between 2005 and 2020, falling by 19% between 2005-2012 and by 33% between 2012 and 2020. This trend is largely due to the availability of renewable energy generated electricity (a sixfold increase between 2005 and 2020) and an associated reduction in the use of carbon heavy fuels such as peat and coal.

Due to the scale of the challenge, and the recognition of central role of the electricity sector in achieving sector wide targets, the electricity sector has been allocated the smallest carbon budget and will require the steepest carbon emissions decline of all sectors – namely a reduction in carbon emission by -75% relative to 2018 baseline. Carbon budgets 1 and 2 allow for 30.02 MtCO₂eq from the electricity sector up to 2025 and 20 MtCO₂eq. from 2026-2030. This means an average of 8 MtCO₂eq. per annum. Emissions for the period 2021 were 9.98 MtCO₂eq., which is in exceedance of 8 MtCO₂eq., which means that to keep on track, electricity will now have to achieve annual emissions of c. 7.5 MtCO₂eq. from 2022 to 2025. The measures set out for the electricity sector include *inter alia*:

- Reduce annual CO₂eq. emissions from the sector to 3 MtCO₂eq by 2031 (75% reduction compared to 2018);
- Accelerate and increase the deployment of renewable energy to replace fossil fuels;
- Accelerate the delivery of onshore wind, offshore wind and solar through a competitive framework to reach 80% of electricity demand from renewable energy by 2030;
- Target 6GW of onshore wind and up to 5 GW of solar by 2025;
- Target 9 GW onshore wind, 8 GW Solar and at least 5 GW of offshore wind by 2030;
- Align the relevant constituent elements of the planning and permitting system to support accelerated renewable energy development, supported by national policy and associated methodologies to inform regional and local planning policies, noting that county development plans are obliged to set out objectives to facilitate energy infrastructure;

Due to the scale of the challenge in relation to renewables, there is no room for consented projects to be unduly delayed. The regularisation of the planning status of the Existing Development, together with permission for the Prospective Development will facilitate the timely completion of the Meenbog Wind Farm.

Climate Action Plan 2024

The Climate Action Plan 2024 (CAP24) builds on CAP23 by refining and updating the status of the actions required to deliver the decarbonisation required under the carbon budgets and sectoral emissions ceilings. The renewable electricity generation targets are unchanged from the CAP23 (9GW of onshore wind & 80% renewable electricity share).

CAP24 includes the latest trends in the electricity sector:

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

CAP24 acknowledges the urgency and importance of the decarbonising the electricity sector. The plan states:

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

The scale of the challenge is apparent when quantified:

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

CAP24 identifies the alignment of local and national policy as critical to accelerate renewable energy rollout:

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

Due to the scale of the challenge in relation to renewables, there is no room for consented projects to be unduly delayed. The regularisation of the planning status of the Existing Development, together with permission for the Prospective Development will facilitate the timely completion of the Meenbog Wind Farm.

Climate Action Plan 2025

The Climate Action Plan 2025 (CAP25) represents the third statutory update to Ireland’s climate roadmap under the Climate Act. Building on the foundations laid by previous plans, CAP25 refines and strengthens the strategies necessary to deliver Ireland’s legally binding carbon budgets and sectoral emissions ceilings. It sets out a clear trajectory to reduce greenhouse gas emissions by 51% by 2030 and to achieve climate neutrality no later than 2050.

A cornerstone of CAP25 is the decarbonisation of Ireland’s electricity system through a substantial increase in renewable energy generation. The plan reaffirms ambitious targets for renewable electricity

share which includes 80% by 2030, and 50% by 2025. This is to be achieved through the accelerated deployment of onshore wind (2 GW by 2025; 9 GW by 2030), offshore wind (8 GW by 2030), and solar energy (up to 5 GW by 2025; 8 GW by 2030).

The regularisation of the planning status of the Existing Development, together with permission for the Prospective Development, will ensure that an important onshore renewable development is developed which will ultimately work towards supporting the targets and aims set out in CAP23, CAP24 and CAP25.

2.3.2.2 Project Compliance with National Climate Policy

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

The regularisation of the planning status of the Existing Development, together with permission for the Prospective Development will facilitate the timely completion of the Meenbog Wind Farm which will ensure that development progresses and generation of renewable energy takes place at the Site, thus being wholly in line with the goals and targets outlined.

2.4 Renewable Energy Policy and Targets

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

- EU Renewable Energy Policy
- National Renewable Energy Policy

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

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

The regularisation of the planning status of the Existing Development, together with permission for the Prospective Development will contribute to fulfilling the nationally stated need to provide a greater amount of renewable energy onto the national grid and will further reduce the national reliance on fossil fuels for electricity generation by facilitating the completion and operation of the Meenbog Wind Farm.

2.4.1 European Renewable Energy Policy

Renewable Energy Directive

The Renewable Energy Directive ('RED') is the EU legal framework for the development of renewable energy across all sectors of the EU economy, supporting clean energy cooperation across EU countries. Since the introduction of the RED in 2009, it has undergone several revisions, the most recent of which

occurred in November 2023. Since its adoption in 2009, the share of renewable energy sources in energy consumption has increased from 12.5% in 2010 to 23% in 2022¹¹. Of the 27 EU member states the lowest proportions of renewables were recorded in Ireland (13.1%). Crucially, the RED sets the overall target for renewable energy in the EU.

RED I – 2009

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

RED II – 2018

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

RED III – 2023

In November 2023, a revision of the Renewable Energy Directive¹² (RED III), came into force. RED III increases the EU wide renewable energy target from 32% set under the previous revision of the directive to 42.5%, with an ambition to reach 45% by 2030. The increase was proposed under the publication of REPowerEU plan in May 2022. The Directive also introduces specific targets for Member States in the industry, transport, and building (district heating and cooling) sectors.

Under RED III, EU member states must identify areas for the acceleration of renewables where projects will undergo a simplified and fast-track procedure. The deployment of renewables will also be of **“overriding public interest”** in order to limit the number of legal challenges on new renewable energy installations. These measures came in response to REPowerEU which found that permitting is the biggest bottleneck for deploying wind at scale, with approximately 80 GW of wind power capacity stuck in permitting procedures across Europe.

On 6 August 2025, the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. No. 274 of 2025)¹³ were adopted for the purpose of giving effect to Articles 15e (5), 16, 16b, 16c (2), 16d, 16e and 16f of the RED III Directive.

The legislation introduces new decision timelines based on a “completeness check” (ss.34E, 37JB, 295B): 52 weeks for new wind farms, 30 weeks for repowering projects, and one to two years for IROPI cases (two years for projects over 150 kW, one year for projects under 150 kW or repowering).

As the Subject Development is made under Section 177E of the Planning and Development Act, 2000, (as amended), the application is not strictly subject to the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. 274 of 2025).

However, it must be noted, the revised Article 16f of the Renewable Energy Directive classifies the planning, construction and operation of renewable energy plants, the connection of such plants to the grid, the related grid itself, and storage assets are presumed as being in the **overriding public interest**. Whilst this application for the Subject Development is not captured by S.I 274 of 2025, it is a significant

¹¹ <https://ec.europa.eu/eurostat/en/web/products-eurostat-news/w/ddn-20231222-2>

¹² Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (recast)

¹³ <https://www.irishstatutebook.ie/eli/2025/si/274/made/en/pdf>

renewable energy development, and therefore we respectfully ask that the application is expediated by the Commission with urgency.

Energy Roadmap 2050

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

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

The analysis found that decarbonising the energy system is technically and economically feasible. The Roadmap notes that all scenarios show the biggest share of energy supply technologies in 2050 comes from renewables. In this regard, it should be noted that the CCAC stated within their 2024 Annual Review that:

“Progress to reduce emissions is not sufficient for Ireland to meet its national and EU climate obligations. Reliance on fossils fuels needs to end, and urgent action is required to ensure that people, places and nature can adapt to the changing climate and prepare for rapidly emerging climate risks. The current rate of policy implementation is too slow and fragmented, and more effective engagement across all segments of policy and society is required to empower sustainable decision-making and to understand and remove barriers to action.”

As such, a major prerequisite for a more sustainable and secure energy system is a higher share of renewable energy up to and beyond 2030 to 2050. Each of the scenarios assumes in the analysis that increasing the share of renewable energy and using energy more efficiently are crucial, irrespective of the particular energy mix chosen.

The Subject Development, if consented, will facilitate the completion of construction and operation of the Meenbog Wind Farm. As noted above, the crucial aspect of deployment cannot be ignored and should the Subject Development be granted planning permission, the prompt operation of the Meenbog Wind Farm will follow. The Meenbog Wind Farm will increase the share of renewable energy being produced onto the national grid thereby reducing the reliance on more unsustainable forms of electricity production.

European Green Deal

The European Green Deal, further detailed in Section 2.2.1, was launched in December 2019 and proposes to increase the binding target of renewable sources in the EU’s energy mix from 32% to **40% by 2030** via amendments to the Renewable Energy Directive as per the ‘Fit for 55’ package (July 2021)¹⁴. The Deal recognises that 75% of the EU’s GHG emissions stems from the production and use of energy, hence emphasising the need to decarbonise the EU’s energy system. The deal identifies three key principles to support a clean energy transition:

¹⁴ <https://www.consilium.europa.eu/en/policies/eu-plan-for-a-green-transition/>

1. Ensuring a secure and affordable EU energy supply
2. Developing a fully integrated, interconnected and digitalised EU energy market
3. Prioritising energy efficiency, improving the energy performance of our buildings and developing a power sector based largely on renewable sources¹⁵.

REPowerEU

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

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

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

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

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

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

The Subject Development presents an opportunity to increase the amount of indigenous renewable energy onto the national grid thereby further increasing Ireland's energy security in line with the principle aim of the REPowerEU plan.

2.4.1.2 Project Compliance with EU Policy

The Subject Development is fully aligned with, and supported by, relevant EU energy and climate policy. It will contribute to the objectives of the 2030 Climate and Energy Framework, including the EU-wide binding targets of achieving at least 27% renewable energy and 27% energy efficiency by 2030.

¹⁵ https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/energy-and-green-deal_en

Additionally, the Subject Development supports the increased ambition to raise the share of renewables in the EU's energy mix from 32% to a minimum of 42.5% by 2030.

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

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

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

2.4.2

National Renewable Energy Policy

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

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

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

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

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

"Onshore wind continues to be the main contributor (18.2% of total generation and 81% of RESE in 2014). It is a proven technology and Ireland's abundant wind resource means that a

wind generator in Ireland generates more electricity than similar installations in other countries. This results in a lower cost of support.”

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

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

With regard to the above, it is clear that the contribution of a fully operational Meenbog Wind Farm will ensure the safe and secure supply of renewable electricity onto the national grid. The Subject Development will, if granted planning permission, directly aid the aim of decarbonising the electricity sector.

National Energy Security Framework

More recently, the National Energy Security Framework (DECC, April 2022) highlights clearly the impacts the Russian invasion of Ukraine and the resulting war has had on Europe’s energy system. The resulting decision by the European Union to phase out the import of Russian gas, oil and coal has brought to the fore the importance of security of supply and how energy policy is designed for long-term resilience. It takes account of the need to decarbonise society and economy, to reduce Ireland’s emissions by 51% over the decade to 2030 and reach net zero emissions by 2050. According to the SEAI’s Energy in Ireland (2020) report, oil accounts for 55.6% of Ireland’s primary energy requirement making it one of the highest rates of oil dependency in the EU. The International Energy Agency, of which Ireland is a member country, includes a 10-point plan to cut oil use which calls for an acceleration in the deployment of wind and solar projects. Ireland’s response per the Framework is set out over three themes:

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

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

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

1. *Reduced and Responsive Demand*
2. *Transition to Renewables*
3. *Building More Resilient Systems*

4. Implementing Robust Risk Governance

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

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

With regard to the above, it is clear that the contribution of a fully operational Meenbog Wind Farm will ensure the safe and secure supply of renewable electricity onto the national grid. The Subject Development will, if granted planning permission, directly aid the aim of decarbonising the electricity sector and is vital in helping to secure the State's energy supplies and reduce reliance on imported fossil fuels.

Energy Security in Ireland to 2030 – Energy Security Package

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

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

Independent research undertaken as part of the package, McCarthy Report¹⁶, provides an analysis of developments in the electricity sector in Ireland. The McCarthy Report makes the following observation in relation to the consenting process:

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

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

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

The Meenbog Wind Farm is set to significantly support the government's objectives in ensuring the State's energy security. The Meenbog Wind Farm will serve as a domestic renewable energy generator capable of providing clean electricity to the national electricity grid, contributing to a renewables-led system.

¹⁶ <https://www.gov.ie/pdf/?file=https://assets.gov.ie/276441/eb496e01-5c01-4594-af09-74342b4ac971.pdf#page=null>

Having regard to the above, it is clear that the provision of additional renewable energy generation, in the form of an operational Meenbog Wind Farm is vital in helping to secure the State's energy supplies and reduce reliance on imported fossil fuels.

2.4.2.2 Project Compliance with National Renewable Energy Policy

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

2.5 Climate and Renewable Energy Target Progress

At a European level, the latest data shows that, as of 2024, 25.2% of energy came from renewable energy sources¹⁷. This represents an increase of 0.8% compared to 2023 levels. While progress is being made to increase the share of renewable energy, it is clear that all EU member states need to intensify their efforts to collectively comply with the target of 42.5% set in the latest revision of the renewable energy directive.

Of the 27 EU member states, Ireland had one of the lowest proportions of renewable energy at 16% in 2024¹⁸. It is evident that Ireland is not performing well when compared against our European counterparts and that urgent action is required to increase the overall share of renewable energy in our gross final energy consumption. When it comes to the share of renewable energy in electricity, Ireland does perform better generating 41.3% in 2024, but still below the EU average of 47.5%¹⁹.

Table 2-1 Overall Share of Energy from Renewable Sources (Source: Eurostat)

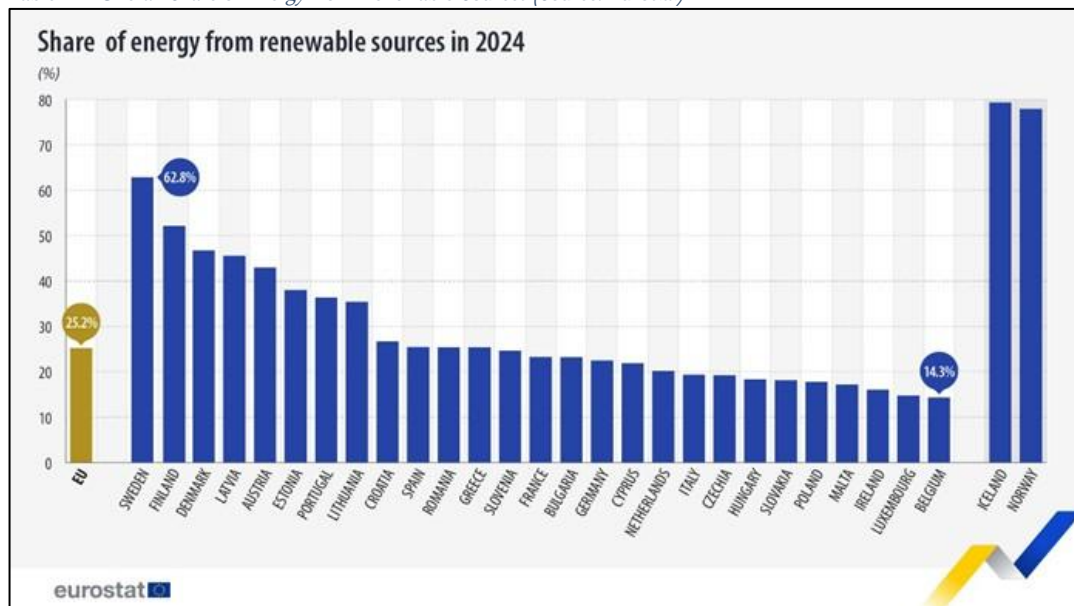


Figure 2-1 Overall Share of Energy from Renewable Sources (Source: Eurostat)

¹⁷ https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Renewable_energy_statistics

¹⁸ https://ec.europa.eu/eurostat/statistics-explained/index.php?title=File:Renewable_energy_2024_infographic.jpg

¹⁹ https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Renewable_energy_statistics

Ireland's Greenhouse Gas Emissions Projections

The EPA publishes Ireland's Greenhouse Gas Emission Projections and the most recent report, *'Ireland's Greenhouse Gas Emissions Projections 2024–2055'* was published in May 2025. The report includes an assessment of Ireland's progress towards achieving its emission reduction targets out to 2030 set under the EU Effort Sharing Regulation (ESR).

The EPA has produced two scenarios in preparing these GHG emissions projections: a "With Existing Measures" (WEM) scenario and a "With Additional Measures" (WAM) scenario. These scenarios forecast Ireland's GHG emissions in different ways. The WEM scenario assumes that no additional policies and measures, beyond those already in place by the end of 2023. This is the cut off point for which the latest national GHG emission inventory data is available, known as the 'base year' for projections. The WAM scenario has a higher level of ambition and includes the latest government policies and measures (at the time the Projections are compiled) to reduce emissions such as those in Ireland's CAP25.

The EPA Emission Projections Update notes the following key trends:

- Ireland is not on track to meet the 51% emissions reduction target (by 2030 compared to 2018) based on these projections which include the CAP25 measures. GHG emissions are projected to be 9% to 23% lower by 2030 (compared to 2018), placing Ireland further from the 2030 National climate target when compared to previous assessments.
- Budget period 1, 2021-2025, of 295 Mt CO₂eq is projected to be exceeded by 8 to 12 Mt CO₂eq. Budget period 2, 2026-2030 of 200 Mt CO₂eq is also expected to be exceeded by a significant margin of 77 to 114 Mt CO₂eq (with carryover from Budget period 1).
- Ireland will not meet its non-Emissions Trading Scheme (ETS) EU targets of a 42% emissions reduction by 2030 even with flexibilities applied. The assessment shows a reduction by 13% to 26% by 2030 with the use of flexibilities.
- Sectoral emissions ceilings for 2025 and 2030 are projected to be exceeded by the Buildings, Electricity, Industry and Transport sectors.
- Emissions from the Energy Industries sector are projected to decrease by between 59 and 68%. Renewable energy generation at the end of the decade is projected to range from 60 to 68% of electricity generation.

As decarbonising electricity generation will have a significant positive contribution in achieving Ireland's emissions, it is clear that additional renewable energy production, such as that of the Subject Development, must be encouraged and supported if carbon-saving targets are to be met.

National Energy Projections (September 2025)

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

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

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

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

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

The Report projects GHG emissions under the WEM and WAM scenarios. In the WEM scenario, total greenhouse gas emissions are expected to exceed the carbon budgets for CB1, CB2 and provisional CB3 in 2025, 2029 and 2031, respectively, with a cumulative exceedance of 23% by the end of 2030. In the WAM scenario, cumulative exceedance of 16% is projected by the end of 2030. The projected overall carbon budgets exceedance has reduced from the 2024 projections, though there are still significant risks that this could increase again subject to market changes and the pace of implementation of policy.

Energy in Ireland (December 2025)

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

The Report identifies that Ireland’s national energy-related emissions in 2024 were at their lowest level in over 30 years. Energy-related emissions in 2024 were 30.9 MtCO₂eq, down 1.5% on 2023 levels. Energy-related emissions fell by over 6.9 MtCO₂eq in 2024 – the lowest on record, down 8.3% from 2023 levels. The following are some of the key points, relating to renewable energy and energy emissions:

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

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

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

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

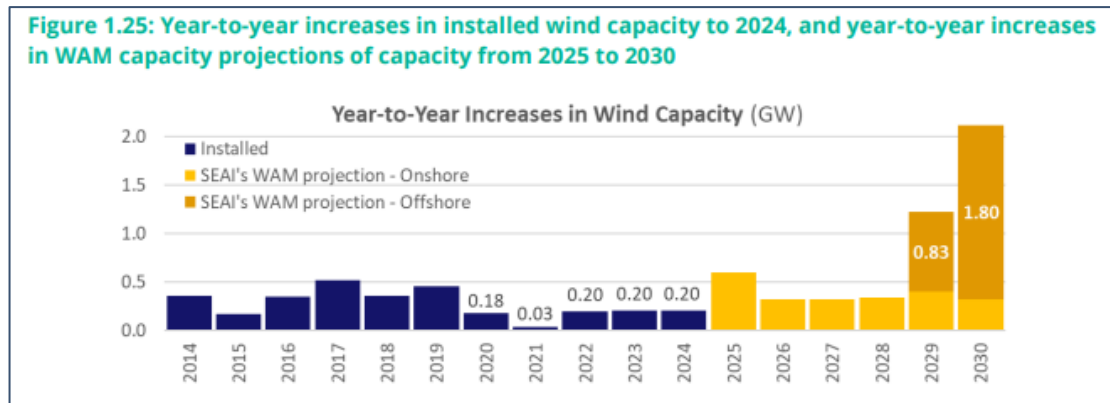


Figure 2- 2 Irelands year-to year increases in installed wind capacity required to align the pace of the WAM

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

The Climate Change Advisory Council Annual Review 2025

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

“1. Ireland remains substantially off track in meeting its EU and national emissions reduction targets, with progress in the Agriculture and Transport sectors, which collectively account for approximately 55% of Irish emissions, proving particularly slow. The Government is urged to move from ambitious statements to implementing impactful and demonstrable actions that build momentum and public buy-in.

2. Failure to meet targets will potentially result in substantial compliance costs, estimated to be in the range of €8–26 billion, and a colossal missed opportunity to invest in Irish households, communities and businesses – creating jobs, improving health and wellbeing, and protecting the most vulnerable in society.”

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

The Climate Change Advisory Council Annual Review 2025 – Electricity

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

“To meet the carbon budgets, emissions from the Electricity sector will need to reach zero by the end of the 2030s. In 2024, electricity emissions fell by approximately 7% relative to 2023, reaching the lowest level since record-keeping began in 1990. This was driven by a continued decline in the use of coal for electricity generation, coupled with a notable rise in imported electricity for the second consecutive year. Renewable energy is still not being rolled out fast enough, and insufficient investment in the electricity grid means that some of the renewable

energy we currently generate cannot be used. Emissions are currently projected to exceed the sectoral emissions ceiling, even in the most optimistic scenario.”

Key observations in relation to Renewable Electricity are outlined below:

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

Ireland's Climate Change Assessment (January 2024)

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

- Volume 1: Climate Science – Ireland in a Changing World
- Volume 2: Achieving Climate Neutrality in 2050
- Volume 3: Being Prepared for Ireland's Future
- Volume 4: Realising the Benefits of Transition and Transformation

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

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

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

2.6.1

Introduction

This section of the EIAR provides the strategic planning context of the Subject Development. The Subject Development is in line with national, regional and local policies, frameworks, guidelines and plans. This section has been broken down to the following sections:

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

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

2.6.2

National Planning Policy

The Planning and Development Act 2024

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

The Government has approved an Implementation Plan for the Planning and Development Act 2024, which sets out the schedule for its phased commencement. The Implementation Plan also outlines a series of initiatives aimed at supporting training and stakeholder engagement across the planning sector to ensure a smooth transition to the new legislative framework. Concurrently, work is ongoing to revise and update the supporting Regulations that will underpin the operation of the new Act. This application is being made under the provisions of the Planning & Development Act 2000 as amended, as is currently still applicable.

National Planning Framework: Project Ireland 2040

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

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

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

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

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

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

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

Relevant to the Meenbog Wind Farm, the **National Strategic Outcome 8** (*Transition to Sustainable Energy*), notes that in creating Ireland’s future energy landscape, new energy systems and transmission grids will be necessary to enable a more distributed energy generation which connects established and emerging energy sources, i.e. renewables, to major sources of demand. The successful transition to a low-carbon power system will depend on the pillars of 1) *Sustainability*, 2) *Security of supply* and 3) *Competitiveness*. A common theme underpinning these pillars is the need for a fit-for-purpose transmission and distribution energy network. Specifically, the NPF states that reinforcement of the distribution and transmission network to facilitate planned growth and distribution of a more renewables focused source of energy across the major demand centres, e.g. the functional purpose of the Grid Connection and on-site 110kV substation.

The following National Policy Objectives (NPO) are applicable to the Subject Development.

- **NPO 21:** *Enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services, including ICT-based industries and those addressing climate change and sustainability.*
- **NPO 54:** *Reduce 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.*

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

“The manner in which we plan is important for the sustainability of our environment. Our planning system has influence across a wide range of sectors, both directly and indirectly and interacts with many common issues related to effective environmental management, including water services, landscape, flood risk planning, protection of designated sites and species, coastal and marine management, climate mitigation and adaptation, and land use change.”

An overarching objective of the NPF is to foster a transition toward a low carbon, climate-resilient society, which reflects the policy ethos established at the European level of governance (e.g. climate change and renewable energy targets). In this regard, one of the key themes of the NPF is the realisation of an Ireland which has a secure and sustainable renewable energy supply and the ability to

diversify and adapt to new energy technologies. The NPF references the national Climate Policy Position which established the fundamental objective of achieving transition to a competitive, low carbon, climate resilient and environmentally sustainable economy by 2050. The NPF emphasises that rural areas have a strong role to play in securing a sustainable renewable energy supply for the country and acknowledges that *“rural areas have significantly contributed to the energy needs of the country and continue to do so”*. In this regard, the NPF states:

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

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

In regard to the above, it is clear that the provision of new renewable energy generation is in line with the aims and objectives of the NPF which seeks to transition to a low carbon economy. The Subject Development, if granted substitute consent, will aid in reaching the targets of reducing GHG emissions from the energy sector and further strengthen Ireland’s energy security.

It is considered that the Meenbog Wind Farm (and so the Subject Development therefore) is in line with the National Planning Framework. This framework projects a population increase of 1 million people by 2040 and therefore recognises the strain and demand this will put on Ireland’s energy system. In order to ensure Ireland delivers on our renewable energy and carbon emission reduction targets, the NPF recognises the need for increased renewable energy onto the national grid.

This shift from fossil fuels is dependent upon schemes such as the one proposed to generate renewable energy. Given the projected population increase, it is considered that if the share of renewable energy onto the grid is not increased, Ireland will fail to reach the National and International targets on emission reductions.

The Meenbog Wind Farm will have an estimated electricity generation capacity of approximately 91.2MW when it comes online and will significantly contribute to Ireland’s national targets and support the country in meeting its renewable energy and carbon emission reduction goals at the EU level. The regularisation of the planning status of the Existing Development, together with permission for the Prospective Development will facilitate the timely completion of the Meenbog Wind Farm and will therefore contribute to meeting Ireland’s national and EU renewable energy and carbon emission reduction goals.

National Planning Framework First Revision (2025)

On the 8th of April 2025, the Government approved the National Planning Framework First Revision (Revised NPF) which was subsequently passed through both Houses of the Oireachtas. The Revised NPF aims to address changes that have occurred in Ireland since 2018.

The Revised NPF provides an updated projection for the population of Ireland, with the population expected to increase to 6.1 million by 2040. This population growth will place further demand on both the built and natural environment, and subsequently, the services required to meet said demands. In order to strengthen and facilitate more environmentally focused planning at the local level, the Revised NPF states that future planning and development will need to:

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

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

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

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

Regional Renewable Energy Capacity Allocations have been introduced under the Revised NPF. This was one of the key actions under CAP24 and is supported within CAP25. The Northern and Western Region, in which the Subject Development is located, is allocated a target of installing an **additional 1,389 MW of onshore wind energy by 2030**.

Under **NPO 74** Regional Assemblies are required to plan for the delivery of the regional renewable electricity capacity allocations outlined in the Revised NPF and identify allocations for each of the local authorities within their RSES. Furthermore, **NPO 75** requires Local Authorities to plan for the delivery of Target Power Capacity (MW) allocations consistent with the relevant RSES, through their City and County Development Plans. At the time of writing, no local Target Power Capacity allocations have been established, however it is clear from the regional allocation that the Northern and Western Region is set to deliver a significant amount of onshore wind energy in the coming years.

The introduction of renewable energy targets represents a more active and prescriptive approach to land use planning for renewable energy development. The Revised NPF aligns the national target of 9GW of onshore wind energy with the policies and objectives of Local Authorities. In regard to this, it is clear that the provision of new renewable energy generation through the Subject Development is in line with aims and objectives of the Revised NPF, which seeks to transition to a carbon neutral economy.

National Development Plan 2021-2030

The National Development Plan 2021-2030 (NDP) was published on 4th October 2021 and sets out the major public investment projects identified by Government which are to play a significant role in addressing the opportunities and challenges faced by Ireland over the coming years such as Covid-19, Brexit, housing, health, population growth, and most relevant to the Subject Development, climate change. It is stated that the NDP 2021 – 2030 will be the *‘largest and greenest ever delivered in Ireland’*, and in this regard, the NDP highlights that extensive consultation was undertaken to ensure that the plan adequately supports the implementation of climate action measures. Reflecting on the recent publication of the IPCC’s 6th Assessment Report, the NDP notes that the Irish Government is fully committed to ‘playing its part’ to ensure that the worst climate change damage can be avoided, e.g. significant reductions in CO₂ and other GHG emissions as assisted by the achievement of both European and National renewable energy targets. Specifically, the NDP states that,

“The next 10 years are critical if we are to address the climate crisis and ensure a safe and bright future for the planet, and all of us on it.”

The investment priorities included in this chapter [Ch. 13] must be delivered to meet the targets set out in the current and future Climate Action Plans, and to achieve our climate objectives. The investment priorities represent a decisive shift towards the achievement of a decarbonised society, demonstrating the Government’s unequivocal commitment to securing a carbon neutral future.”

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

The Subject Development is considered to be in compliance with the aims and objectives of the NDP. One of the NDP’s strategic climate priorities is the need for low-carbon, resilient electricity systems; specifically, the plan commits to increasing the share of renewable electricity up to 80% by 2030. This is characterised by the NDP as an ‘*unprecedented commitment to the decarbonisation of electricity supplies*’, which is certainly an ambitious and an explicit driver for the deployment of new renewable generators such as the Meenbog Wind Farm. The focus of investment in renewable energy infrastructure is to contribute to a long-term, sustainable and competitive energy future for Ireland.

National Development Plan – 2025 Review

The National Development Plan Review 2025 (the Updated NDP) sets out a comprehensive capital investment framework for the period 2026–2035, totalling €275.4 billion. Within this framework, wind energy is recognised as a key enabler of the State’s legally binding commitment to reduce greenhouse gas emissions by 51% by 2030, including a 75% reduction in emissions from the electricity sector. To support the expansion of renewable electricity generation, the Government has allocated €3.5 billion in equity funding to ESB Networks and EirGrid to enhance grid transmission and distribution infrastructure, which will directly facilitate increased integration of wind energy developments such as the Meenbog Wind Farm.

2.6.2.2 Project Compliance with National Policy

With regard to the above, it is considered that the Subject Development is in line with and supported by the NPF, Revised NPF, the NDP, and the Updated NDP.

The Revised NPF projects a population increase of 1 million people by 2040 and therefore recognises the strain and demand this will put on Ireland’s energy system. In order to ensure Ireland delivers on our renewable energy and carbon emission reduction targets, the NPF recognises the need for increased renewable energy onto the national grid. The Subject Development is directly supported by National Planning Objective 21, 54, and 55.

The NDP and the Updated NDP is clear in its priority to reach a low-carbon, climate resilient society over the lifetime of the plan. The Subject Development, if permitted, will provide clean, renewable electricity to the national grid, furthering the objectives of the NDP and the Updated NDP, namely the target to increase the share of renewable electricity up to 80% by 2030 and a 75% reduction in emissions from the electricity sector.

This shift from fossil fuels is dependent upon schemes such as the Subject Development to generate renewable energy. Given the projected population increase, it is considered that if the share of renewable energy onto the grid is not increased, Ireland will fail to reach the National and International targets on emission reductions. The addition of 19 no. wind turbines, with an estimated electricity generation capacity of 91.2MW, will contribute to Ireland’s national targets and support the country in meeting its renewable energy and carbon emission reduction goals at the EU level.

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

The regularisation of the planning status of the Existing Development, together with permission for the Prospective Development will contribute to fulfilling the nationally stated need to provide a greater amount of renewable energy onto the national grid and will further reduce the national reliance on fossil fuels for electricity generation by facilitating the completion and operation of the Meenbog Wind Farm.

2.6.3

Regional Planning Policy

Northern and Western Regional Spatial and Economic Strategy 2020 – 2032

The Northern and Western Regional Assembly (NWRA) was established in 2015 and the Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region (Donegal, Monaghan, Cavan, Leitrim, Sligo, Mayo, Roscommon, and Galway) came into effect on 31st January 2020. The RSES provides a long-term, strategic development framework for the future physical, economic, and social development of the Southern Region. The RSES seeks to achieve balanced regional development and full implementation of Project Ireland 2040 – the National Planning Framework.

Adopted in January 2020, the principal statutory purpose of the RSES is to support the implementation of the Project Ireland 2040 NPF and NDP and the economic policies and objectives of the Government. The RSES aims to build on the region's strengths and potential to become a more prosperous, sustainable, climate resilient and attractive region for the benefit of all its people up to 2040 and beyond.

The North and Western region is characterised by the RSES as having ‘*a unique natural endowment of ample carbon-neutral, energy supplies*’ such as wind. Specifically, the Western Region is stated as being ‘*particularly rich*’ in renewable energy resources dispersed across the region. The RSES acknowledges that the region has a pivotal role in delivering a successful transition to Ireland's proposed low carbon economy with huge potential for growth in renewables. As such, there is ‘*still significant potential*’ for all new renewable energy outputs to the grid. In order to facilitate the growth of renewables within the region, the RSES notes that the NWRA aims to encourage stakeholders, i.e. industry, commercial etc., to be the first to facilitate new opportunities and concentrate on possibilities to further advance renewable energy generation and use.

These strategic aims are captured in Policy Objectives 4.16, 4.17 and 4.18:

- **RPO 4.16:** *The NWRA shall co-ordinate the identification of potential renewable energy sites of scale in collaboration with Local Authorities and other stakeholders within 3 years of the adoption of the RSES. The identification of such sites (which may extend to include energy storage solutions) will be based on numerous site selection criteria including environmental matters, and potential grid connections.*
- **RPO 4.17:** *To position the region to avail of the emerging global market in renewable energy by stimulating the Development and deployment of the most advantageous renewable energy systems, including:*
 - *Stimulating the Development and deployment of the most advantageous renewable energy systems;*
 - *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 utilisation of the energy generated from renewable sources having regard to the future potential of the region over the lifetime of the Strategy and beyond.*
- **RPO 4.18:** *Support the Development of secure, reliable and safe supplies of renewable energy, to maximise their value, maintain the inward investment, support indigenous industry and create jobs.*

As indicated above, there is a clear precedent within the region to identify and capitalise on emerging opportunities associated with the transition to a decarbonised economy such as renewable energy generation. It should be noted, however, that the existing transmission network within the region is predominantly 110 kV with very little higher capacity 220kV and 400kV transmission infrastructure. As such, the RSES endorses the future development of the grid in order to safely facilitate more diverse power flows from surplus regional generation and also to facilitate future growth in electricity demand:

- **RPO 8.3:** *The Assembly support the necessary integration of the transmission network requirements to allow linkages with renewable energy proposals at all levels to the electricity transmission grid in a sustainable and timely manner.*
- **RPO 8.4:** *That reinforcements and new electricity transmission infrastructure are put in place and their provision is supported, to ensure the energy needs of future population and economic expansion within designated growth areas and across the Region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs. Ensure that Development minimises impacts on designated areas.*

The RSES is ultimately supportive of the future growth of renewable energy technology in the region and sets a clear precedent to identify and capitalise on those opportunities associated with the transition to renewable energy generation.

The RSES for the Northern and Western Region states that the region has a crucial role to play in Ireland transition to a low carbon future. It is considered that the provision of the Development would facilitate this transition and is particularly in line with **RPO 4.17** and **4.18** as outlined above. In the region, a noticeable trend has emerged to recognize and take advantage of emerging opportunities related to the shift towards a decarbonized economy, particularly in the realm of renewable energy generation and therefore the Subject Development is considered to be in accordance with Regional Policy.

2.6.3.2 Project Compliance with Regional Policy

The RSES for the Northern and Western Region clearly outlines its objective to support the development of renewable energy within the Region, such as the Subject Development. It is considered that the provision of the Subject Development would facilitate this objective and is particularly in line with **RPO 4.17** and **4.18**.

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

2.6.4

Local Policy Context

Donegal County Development Plan 2024 – 2030

The Donegal County Development Plan 2024 – 2030 (DCDP) was adopted by Resolution of Members on 16th May 2024. In accordance with Section 12(17) of the Planning and Development Act, 2000 (As Amended) ('the Act') the Plan shall have effect 6 weeks after the day that it is made i.e. 26th June 2024. On 26th June 2024 the Minister of State for Local Government and Planning issued a 'Notice of Intention to Issue a Direction' to the Planning Authority under Section 31 of the Planning and Development Act, 2000 (As Amended) ('the Act').

Climate change mitigation and adaptation objectives have been incorporated into the policies of the DCDP. This is to ensure that climate change has been consistently integrated into the policy themes addressed by the DCDP. Chapter 4 of the DCDP in conjunction with the Local Authority Climate Action Plan (LACAP) 2024 TO 2029 sets out how Donegal County Council will be responsible for enhancing climate resilience, increasing energy efficiency, and reducing greenhouse gas emissions, cross its own assets, services, and infrastructure, for which it is fully accountable, whilst also demonstrating a broader role of influencing, advocating, and facilitating other sectors, to meet their own climate targets and ambitions. This chapter also aligns itself with wider policies and notes that the DCDP "has an important role to play in the achievement of the national and international objectives".

With regard to renewable energy, Chapter 9 sets out the policy for the County's energy strategy. The DCDP acknowledges the importance of wind energy as a renewable energy source. It also highlights that Donegal is ideally and strategically located on the North-West Atlantic coast in terms of wind speed and consistency.

The DCDP sets out a number of General Objectives:

- **E-O-1** - To sustainably develop a diverse and secure renewable energy supply to meet demands and capitalize on the County's competitive locational advantage.
- **E-O-2** - To secure the maximum potential from the wind energy resources of the County commensurate with the receiving environment and local developments patterns consistent with the proper planning and sustainable development, thereby contributing to the national drive towards ensuring the security of energy supply.

The DCDP also sets out a number of Wind Energy Policies which set out a broad framework against which all windfarm developments will be considered.

The Subject Development will contribute to the fulfilment of these policy objectives outlined.

The Subject Development adheres to **Policy WEP-1A** of the DCDP as outlined below and discussed in Table 2-2.

'The augmentation, upgrade, repowering and improvements of: existing windfarms; windfarm developments under construction; developments where permission has lapsed but substantial works have been completed, or on sites with an extant planning permission will be open to consideration in all three designated areas ('Not Normally Permissible', 'Open to Consideration', and 'Acceptable in principle') on Map 9.2.1 where such proposals shall be generally confined to the planning unit of the existing development, or where a modestly-proportioned projection (relative to the established unit) beyond the established site can be demonstrated to be essential and unavoidable for the project in terms of operational efficiencies, and can demonstrate beyond reasonable doubt that all environmental issues can be adequately addressed.'

Table 2-2 Subject Development compliance with DCDP Policy Objective WE-P-1A

WE-P-1A	Subject Development compliance with Policy
<i>The augmentation, upgrade, repowering and improvements of: existing windfarms; windfarm developments under construction; developments where permission has lapsed but substantial works have been completed, or on sites with an extant planning permission will be open to consideration in all three designated areas (‘Not Normally Permissible’, ‘Open to Consideration’, and ‘Acceptable in principle’) on Map 9.2.1</i>	The project meets a number of these criteria by comprising – ▪ ‘windfarm developments under construction’ (although construction is paused) ▪ ‘on sites with an extant planning permission’ (Subject Development relates to the Permitted Meenbog Windfarm (ACP Ref: 300460).) On the basis of the above, the Subject Development is considered to be ‘Open to Consideration’.
<i>where such proposals shall be generally confined to the planning unit of the existing development, or where a modestly-proportioned projection (relative to the established unit) beyond the established site can be demonstrated to be essential and unavoidable for the project in terms of operational efficiencies, and can demonstrate beyond reasonable doubt that all environmental issues can be adequately addressed.</i>	The red line boundary of the Subject Development is generally confined with the red line boundary of the Permitted Meenbog Windfarm. The red line boundary of the Subject Development includes for a BMEP Site (117ha), of which 108ha are intended for enhancement. This BMEP Site has been established to provide approximately twice as much blanket bog habitat as has been lost or degraded by the Existing Development and peat slide combined, and approximately the same amount of permanent foraging habitat for hen harriers as will be lost by the Prospective Development, to ensure no biodiversity net loss by the Subject Development, as is therefore an essential element of the Subject Development.

Policy **WE-P-2** states –

‘That wind farm developments:

- a. Must not be located within the zone of visual influence of Glenveagh National Park;*
- b. Must not be located within the following areas, subject to the possible exceptions set out in Policy WE-P-1A:*
 - i. the Gweebarra River Basin;*
 - ii. areas contained within ‘Especially High Scenic Amenity’ on Map 11.1 ‘Scenic Amenity’ and*
 - iii. St. John’s Point. ‘*

Policy **WE-P-3** states –

To ensure that the assessment of wind energy development proposals will have regard to the following:

- a. sensitivities of the county’s landscapes;*

- b. *visual impact on protected views, prospects, designated landscapes, as well as local visual impacts;*
- c. *impacts on nature conservation designations, archaeological areas, county geological sites, historic structures, public rights of way and walking routes;*
- d. *local environmental impacts, including those on residential properties, such as noise, shadow flicker and over-dominance;*
- e. *visual and environmental impacts of associated development, such as access roads, plant and grid connections from the proposed wind farm to the electricity transmission network;*
- f. *scale, size and layout of the project and any cumulative effects due to other projects;*
- g. *the impact of the proposed development on protected bird and mammal species;*
- h. *the requirements and standards set out in the DEHLG Wind Energy Development Guidelines 2006, or any subsequent related Guidelines (or as may be amended).*
- i. *‘The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009)’; and*
- j. *the protection of drinking water sources and public water services infrastructure.*

In addition, all applications for wind farm development located on peatland and bog, including repowering and augmentation projects, shall be accompanied by a ‘Peat Stability Risk Assessment Report’.

Policy **WE-P4** states –

To support and facilitate, appropriate on site wind energy development by auto producers/micro producers (see definitions below) where energy generated is primarily required to meet the immediate needs of the development, whether community/ agricultural and/or small enterprise, subject to compliance with all other relevant objectives and policies contained within this plan. The Wind Energy Map 9.2.1 does not restrict the location of turbines for the purposes of auto-production.

Policy **WE-P5** states –

To ensure that all roads associated with the Development of wind farms are maintained or repaired at the developer’s expense to the satisfaction of the Council.

Policy **WE-P6** states –

To ensure that all windfarm development proposals demonstrate how the proposed development will be of enduring economic benefit to the communities concerned, through a form of community investment/ownership, benefit or dividend, or similar.

Policy **WE-P7** states –

To ensure that the decommissioning, post-operational restoration and restoration of habitats of redundant windfarm developments is achievable and practical once a wind energy development ceases to generate electricity.

Policy **WE-P8** states:

‘To ensure that the assessment of Wind Energy Development Proposals have regard to the following Specific Biodiversity Related Requirement’:

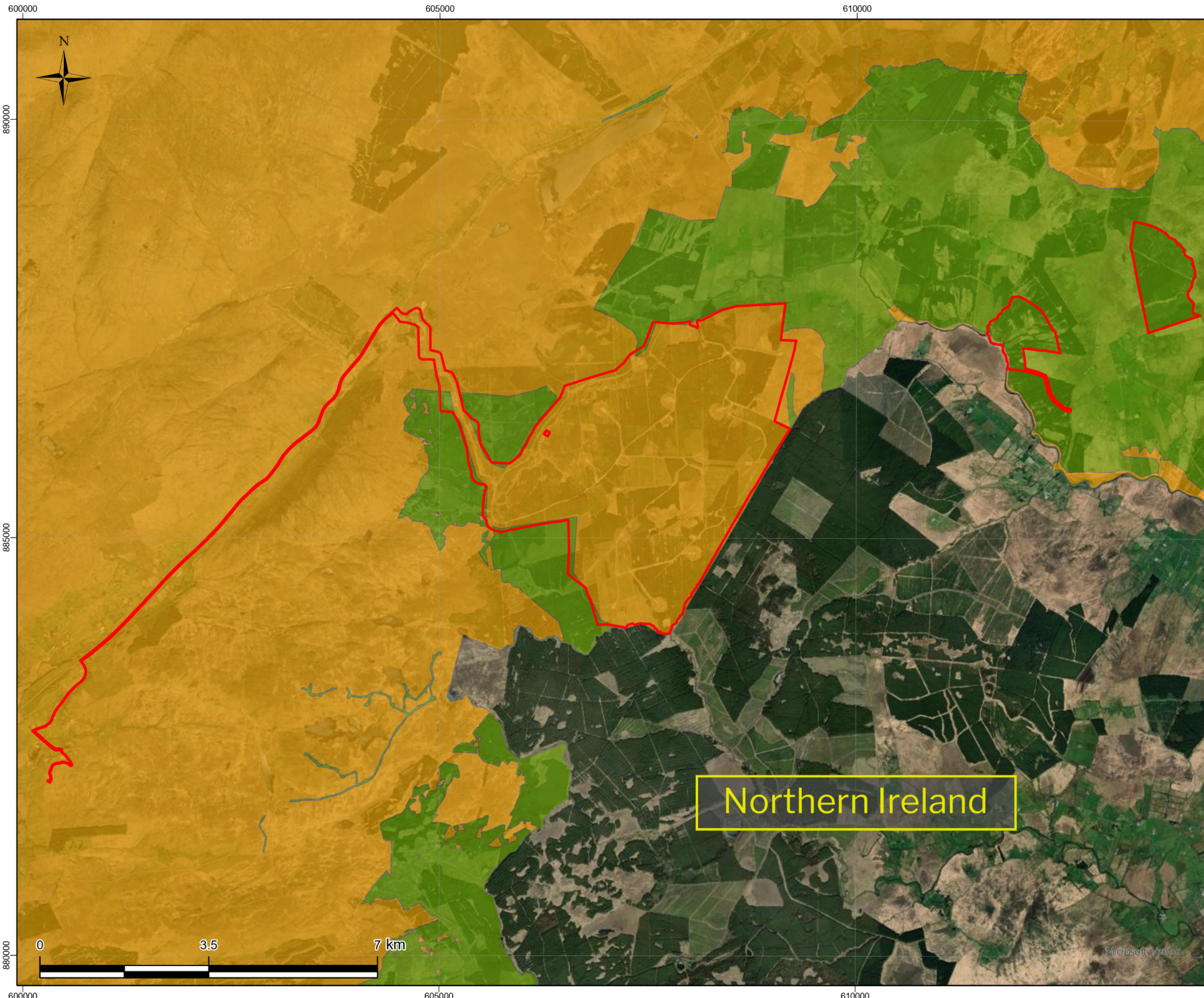
- *Loss of functionally linked habitat*
- *Mortality due to collision with operational wind turbines*
- *Disturbance displacement*
- *Water Quality*

Chapter 9 characterises the county into 3 different policy areas aimed at facilitating large scale commercial wind energy developments. These policy areas are identified as a means of determining the principle of the acceptability or otherwise of proposed wind farm developments. The areas are ‘*areas considered suitable or unsuitable for new wind energy development that have been identified on foot of a comprehensive analysis of the environmental sensitivities and the wind energy potential of the County.*’ The areas and descriptions are set out in Table 2-3 below.

Table 2-3 Donegal County Council Wind Energy Area Designations

Donegal County Council – Chapter 9	
Strategy Area	Description
Acceptable in Principle	Wind farm developments shall be generally acceptable in principle in these areas
Open to Consideration	Wind farm developments shall be generally open to consideration in these areas
Not Normally Permissible	Like the other two designations, these areas were identified on foot of a comprehensive analysis of the environmental sensitivities and the wind energy potential of the County. On foot of this determination, and in-line with national guidelines, it follows that most windfarm developments will not normally be permissible. This should apply in particular to such proposals on previously undeveloped sites, inclusive of sites with a lapsed un-implemented permission (and where substantive works have not been undertaken). Notwithstanding, and having regard to previous planning assessments and decisions and the subsequent investment incurred, it is the position of Donegal County Council that a more balanced approach is required when dealing with windfarm proposals in these areas where, crucially, there is an already existing strong planning history. This refers to the following categories: Existing Windfarms; Developments Under Construction ; Developments Where Permissions Have Lapsed But Where Substantial Works Have Been Completed; and Sites With a Live Permission but not yet started. For such sites, it is considered reasonable to allow for the consideration of proposals for the augmentation, upgrade and improvement of such developments in accordance with the details set out in Policy WE-P-1(c)(ii.) below

The Subject Development is located within a policy area designated as ‘Not Normally Permissible’, as illustrated in Figure 2-3. However, the development is currently under construction, as indicated by the highlighted text under ‘**Development Under Construction**’ (refer to Table 2-3 above).



Map Legend

- Planning Application Boundary
- Not Normally Permissible
- Open To Consideration

Wind Energy Strategy DCDP 2024-2030

Spatial Reference
Name: IREN95 Irish Transverse Mercator
Datum: IREN95
Projection: Transverse Mercator

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SITE LOCATION - NOT TO SCALE

Drawing Title
DCDP 2024-2030 Wind Energy Designation Areas

Project Title
Meenbog Wind Farm, Co. Donegal

Project No. 240505g	Drawing No. 2-3	Scale 1:72,500
Drawn By KB	Checked By RK	Date 30/06/2026

Microsoft, Vector

Email: info@mkofireland.ie / Website: www.mkofireland.ie

The DCDP acknowledges the strong planning history of wind farm developments in certain areas designated as ‘Not Normally Permissible’ and provides for the consideration of proposals involving the augmentation, upgrade, and improvement of such developments within these areas. While the Subject Development is currently located within an area designated as ‘Not Normally Permissible’, the project is considered open to consideration under the current policy framework, as the development is under construction. Planning permission for the Meenbog Wind Farm was granted in June 2018 (ABP Ref: PA05E.300460), and substantive works have since been completed on the Site, as outlined in Section 2.1 of the Remedial Environmental Impact Assessment Report (rEIAR) accompanying this application. Accordingly, the proposed development is considered to align with the provisions of the DCDP. It is also noted that, at the time planning permission was granted on 25 June 2018 for the permitted Meenbog Wind Farm (ABP Ref: PA05E.300460), the lands were designated as ‘Open to Consideration’ under the Donegal County Development Plan 2012–2018.

Overall, it is evident that the DCDP is supportive of the delivery of wind energy projects, in the context of climate change mitigation and adaptation. The policy analysis demonstrates that the Subject Development continues to align with the key policy objectives outlined within the Plan.

Donegal Climate Action Plan 2024 - 2029

The Local Authority Climate Action Plan (LACAP) 2024 to 2029 sets out how Donegal County Council (DCC) will be responsible for enhancing climate resilience, increasing energy efficiency, and reducing greenhouse gas emissions, across its own assets, services, and infrastructure, for which it is fully accountable, whilst also demonstrating a broader role of influencing, advocating, and facilitating other sectors, to meet their own climate targets and ambitions.

The LACAP notes that Climate change is increasingly understood to be the most critical, long-term global challenge of our time. This is echoed by Ireland’s climate where Met Éireann stated that 2022 was ‘the warmest year on record’. This would see Ireland’s temperature above the long-term average for the 12th consecutive year.

Key strategies outlined to address climate change include efficient resource allocation, adaptation strategies, mitigation strategies. Specifically, the Plan sets out policy objectives that increase the use of renewable energy, by aiming to *“Support the delivery of renewable electricity generation and transmission infrastructure within the County”*. Chapter 3 outlines key actions relating to this, which are set out below:

- BE 4.3: Prepare an overall Renewable Energy Strategy for the County.
- BE 4.4: Support local community-based renewable energy projects and new micro-generation and small-scale generation renewable energy projects.
- BE 4.5: Advocate for the ongoing expansion and improvements to the electricity grid infrastructure within the County to support renewable generation and supply.
- BE 4.6: Work with key partners and stakeholders to support the Development of the offshore renewable energy sector in Donegal.

The LACAP states that planning policy supports *“Potential for the further integration of climate action policy and spatial planning across the policy areas of land use and transportation policy, energy efficiency, **renewable energy sources** and infrastructure, district heating, energy storage, natural environment policies, flood risk management and ‘smart towns/cities’ initiatives etc.”* (our emphasis added).

It is therefore evident that the Subject Development aligns with the key policies and objectives of the Donegal County Council Climate Action Plan 2024-2030, in its aim to provide a significant source of renewable energy to support demands, as a mitigation and adaptation response to the pressing issue of climate change.

Derry City and Strabane Local Development Plan 2032

The Derry City and Strabane Local Development Plan 2032 was adopted on the 10th July 2025. The Local Development Plan (LDP) notes that the District has particularly strong potential for generation of renewable and low carbon energy, especially from wind, hydro, biomass and solar. Energy derived from these sources contributes to a sustainable supply of same to local businesses and homes and also contributes to the drive for ‘green electricity’ generation across the island of Ireland through the interconnected grid. As of March 2017, the Derry City and Strabane District is the single largest producing council of renewable energy, generating approximately 27% across NI, having some 44 operational single wind turbines, and 12 wind farms. This demonstrates the Council’s ambition to facilitate renewable energy projects in an aim to meet Government targets of reducing carbon emissions by 100% by 2050 (from 1990 levels) and also to achieve 80% electricity consumption from renewable sources.

Relating specifically to Wind Energy Development, the LDP sets out that proposals for wind energy development, including proposals for repowering of existing developments, will also be required to meet all of the following criteria:

- *the development will not have an unacceptable impact on visual amenity or landscape character through: the number, scale, size and siting of turbines*
- *it is demonstrated that development will not create a significant risk of landslide or bog burst; nor will it exacerbate any existing surface water flooding*
- *no part of the development will give rise to unacceptable electromagnetic interference to communications installations; radar or air traffic control systems; emergency services communications; or other telecommunication systems;*
- *no part of the development will have an unacceptable impact on roads, rail or aviation safety.*
- *turbines proximate to any public road, public right of way or railway line are set back a minimum distance of the fall over distance plus 10% from the edge of same.*
- *turbines proximate to any occupied or occupiable buildings are set back a minimum distance of the fall over distance plus 10% from the curtilage of same;*
- *the development will not cause significant harm to the safety or amenity of any sensitive receptors (including future occupants of committed developments) arising from noise; shadow flicker; ice throw; and reflected light; and*
- *above-ground redundant plant (including turbines), buildings and associated infrastructure shall be removed and the site restored to an agreed standard appropriate to its location. A time limit condition of 30 years will normally be attached.*

The LDP also notes that “*Within designated Wind Energy Capacity Areas (WECA’s), any further wind energy development proposals, including re-powering, will need to be very carefully considered so that they do not unacceptably intensify existing adverse landscape impacts in these areas.*”

These policies highlight the strict parameters for wind farm development within the region. Both the Permitted Development and the Subject Development are in compliance with these policies. The Subject Development has been rigorously assessed concluding that no potential for cumulative impacts when considered in conjunction with Permitted Development were identified. There will be no impact on designated sites as a result of the Subject Development. Best practice preventative measures will be implemented to avoid effects on European Sites. As evident in the rEIAR, rNIS, EIAR and NIS there will be no adverse effects on receptors listed as QIs/SCIs of European Sites, as a result of the development.

2.6.4.2 Project Compliance with Local Policy

In summary, the DCDP and associated Donegal CAP fully recognises the importance of tackling climate change through the increased supply of renewable energy. Donegal County Council seeks to support and facilitate the sustainable provision of a reliable energy supply in the County, with emphasis on increasing energy supplies derived from renewable resources. Furthermore, there are a range of policies in place which support the development of renewable energy.

The Permitted Development was granted planning permission in 2018 and as such the principle of the wind energy development at the location of the Meenbog Windfarm has therefore previously been established. Policy support for the continued deployment of renewable energy developments continues to exist at all levels of the planning policy hierarchy. The Subject Development, to which this 177E application relates, aligns with this policy support against the backdrop of a previously consented wind energy development, and the substantial wind farm infrastructure already constructed at the Site.

2.7 Other Relevant Onshore Wind Energy Planning Policy Publications

The following relevant onshore wind planning policy publications and/or best practice guidelines were considered in the design and assessment of the Prospective Development.

Wind Energy Development Guidelines 2006

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

Each wind energy development has its own characteristics and defining features, and it is therefore impossible to write specifications for universal use. The Guidelines (DoEHLG, 2006) should be applied practically and do not replace existing national energy, environmental and planning policy. While the Guidelines (DoEHLG, 2006) remain the relevant guidelines in place, at the time of lodgement, decision makers (Planning Authorities and the Commission) are not bound to their provisions, and they (and do) consider updated standards/requirements/specifications in assessing impacts and the proper planning and sustainable development of the area.

Draft Wind Energy Development Guidelines 2019

The Department of Housing, Planning and Local Government (DoHPLG) published the Draft Revised Wind Energy Development Guidelines (the Draft Guidelines (DoHPLG, 2019)) in December 2019. A consultation process in relation to the Draft Guidelines (DoHPLG, 2019) concluded on the 19th of February 2020. A further review of the Draft Guidelines (DoHPLG, 2019) is currently underway by the Department of Housing, Local Government and Heritage (DoHLGH) and the Department of Environment, Climate and Communications (DoECC), particularly in relation to noise limits. Since the publication of the Draft Guidelines (DoHPLG, 2019), there have been significant changes in national policy regarding renewable energy targets, giving further impetus to the importance of the further review. The Draft Guidelines (DoHPLG, 2019) set out that that the proper planning and sustainable development of areas and regions must be considered when local authorities prepare their development

plans and assess planning applications, irrespective of the significant role renewable energy has to play in tackling climate change.

The Draft Guidelines (DoHPLG, 2019) note that potential impacts of wind energy development proposals on the landscape, including the natural and built environment, must be considered along with the legitimate concerns of local communities. With this in mind, and in line with the previously stated “preferred draft approach”, the Draft Guidelines (DoHPLG, 2019) primarily focus on addressing a number of key aspects including, but not limited to:

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

The design of the Prospective Development has been developed with the provisions of the Draft Guidelines (DoHPLG, 2019) in mind (for example in relation to 4 times turbine tip height set back distance from third party sensitive receptors) and the inclusion of a standalone community report.

As stated above, the submission period for the Draft Guidelines (DoHPLG, 2019) closed in February 2020. Arising from the consultation, concerns were raised in relation to a number of themes including but not limited to; noise, visual amenity, set back and shadow flicker. With regards to noise, a number of the received submissions noted that the provisions put forward in the Draft Guidelines (DoHPLG, 2019) were unworkable and could impact the viability of the entire onshore wind sector. The noise proposals, in particular, were met with substantial criticism from the acoustics community, who raised concerns about the scientific basis, practicality, and potential unintended consequences of the proposed noise limits and monitoring requirements. In relation to set back distances there was strong criticism with regards to this distance being measured to the curtilage of a property due to this measurement being ambiguous and difficult to implement. Furthermore, questions were raised surrounding the strict measures proposed for shadow flicker; the Draft Guidelines (DoHPLG, 2019) put forward the provision that *‘there will be no shadow flicker at any existing nearby dwelling or other relevant existing affected sensitive property’* which didn’t allow time for the safe shutting down of turbines.

At time of writing the Draft Guidelines (DoHPLG, 2019) are not yet finalised and have not been adopted. The relevant wind energy guidelines for the purposes of Section 28 of the Act, as amended, remain those published in 2006, the Guidelines (DoEHLG, 2006). Notwithstanding this, however, due to the timelines associated with the planning process for renewable energy projects it is possible that an updated version of the Draft Guidelines (DoHPLG, 2019) may be finalised during the consideration period for the current planning application for the Prospective Development. To this end, on the basis of the details available from the Draft Guidelines (DoHPLG, 2019) it is anticipated that the Prospective Development will be capable of adhering to the relevant noise and shadow flicker standards. While the final guidelines have not yet been published it should be noted that Shadow Flicker and Noise are entirely controllable and are discussed further in Chapter 5 (Population & Human Health) and Chapter 12 (Noise & Vibration), respectively. In addition, the Prospective Development maintains a four times tip height set back between turbines and sensitive receptors which is currently the recognised standard for visual amenity purposes, as outlined in the Draft Guidelines (DoHPLG, 2019).

IWEA Best Practice Guidelines for the Irish Wind Energy Industry 2012

The Irish Wind Energy Association (IWEA) (now Wind Energy Ireland) published updated Wind Energy Best Practice Guidelines for the Irish Wind Industry in 2012 (hereafter referred to as the IWEA Guidelines). The IWEA Guidelines aim to encourage and define best practice development in the wind energy industry, acting as a reference document and guide to the main issues relating to wind energy

developments. The purpose of the IWEA Guidelines is to encourage responsible and sensitive wind energy development, which takes into consideration the concerns of local communities, planners, and other interested groups. The IWEA Guidelines outline the main aspects of wind energy development with emphasis on responsible and sustainable design and environmental practices, on aspects of development which affect external stakeholders, and on good community engagement practices. In approaching the development of IWEA Guidelines the aim was to be complementary to the Guidelines (DoEHLG, 2006).

IWEA Best Practice Principles in Community Engagement and Community Commitment 2013

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

DCCAE Code of Practice for Wind Energy Development Ireland – Guidelines for Community Engagement 2016

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

Department Circular PL5/2017

On the 3rd of August 2017, the (then) Department of Housing, Planning and Local Government (DHPLG) issued Circular PL5/2017 to provide an update on the review of the wind energy and renewable policies in development plans, and the advice contained within a previous Departmental Circular PL20-13. Circular PL20-13 advised that local authorities should defer amending their existing Development Plan policies in relation to wind energy and renewable energy generally as part of either the normal cyclical six-yearly review or plan variation processes and should instead operate their existing development plan policies and objectives until the completion of a focused review of the Guidelines (DoEHLG, 2006). The new circular (PL05/217) reconfirms that this continues to be the advice of the Department.

The Circular also set out the four key aspects of a preferred draft approach being developed to address the key aspects of the review of the Guidelines (DoEHLG, 2006) as follows:

- The application of a more stringent noise limit, consistent with World Health Organisation (WHO) noise standards, in tandem with a new robust noise monitoring regime, to ensure compliance with noise standards;
- A visual amenity setback of 4 times the turbine height between a wind turbine and the nearest residential property, Proposed to a mandatory minimum distance of 500 metres between a wind turbine and the nearest residential property;
- The elimination of shadow flicker; and
- The introduction of new obligations in relation to engagement with local communities by wind farm developers along with the provision of community benefit measures.

2.8

Planning History

2.8.1

Planning History of the Site

This section of the EIAR sets out the relevant planning history of the Meenbog Wind Farm, planning applications in the vicinity of the Site, and other wind energy applications within the wider area.

Meenbog Wind Farm

Planning permission was granted under the Strategic Infrastructure Development (SID) process by the Commission (ABP Ref: PA05E.300460) on 25th June 2018, for a 19 no. turbine wind farm development in Meenbog (and surrounding townlands), Co. Donegal, subject to 20 no. conditions.

The full development description of the Permitted Development, for the purposes of the SID application is set out as follows:

“In accordance with Section 37E of the Planning and Development Act 2000, as amended, Planree Limited gives notice of its intention to make an application for a ten year planning permission to An Bord Pleanála in relation to the following proposed Development in the townlands of Meenbog (ED Goland), Croaghonagh and Cashelnavean, County Donegal.

The proposed development will constitute the provision of the following:

- (i) Up to 19 no. wind turbines with a generating capacity in excess of 50MW, and maximum overall ground to blade tip heights of up to 156.5 metres;
- (ii) 1 no. permanent Meteorological Mast up to a maximum height of 110 metres;
- (iii) 1 no. 110kV Electrical substation with 2 no. control buildings with welfare facilities, associated electrical plant and equipment, security fencing and waste water holding tank;
- (iv) Internal wind farm underground cabling;
- (v) 110kV underground grid connection cabling;
- (vi) Upgrade of access junctions;
- (vii) Upgrade of existing tracks, roads and provision of new site access roads and hardstand areas;
- (viii) 3 no. borrow pits;
- (ix) 2 no. temporary construction compounds;
- (x) Recreation and amenity works, including marked trails (upgrade of existing tracks and provision of new tracks), picnic, amenity and play areas, car parking and vehicular access;
- (xi) Site drainage;
- (xii) Forestry Felling;
- (xiii) Permanent signage;
- (xiv) All associated site development and ancillary works.

This application is seeking a ten-year permission and 30 year operational life from the date of commissioning of the wind farm.

An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) have been prepared in respect of the Subject Development. The proposed development is likely to have significant effects on the environment of Northern Ireland.”

Permission for the underground grid connection was obtained through Condition No. 1 of ABP Ref 300460 which states –

‘The proposed development shall be carried out and completed in accordance with the plans and particulars lodged with the application, except as may otherwise be required in order to comply with the following conditions. For the purposes of clarity, the Board considered and is granting permission for the proposed independent underground cabling grid connection from the proposed development at Cashelnavreen to connect to the Clogher substation that was included in the environmental impact assessment report. Where conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the proposed development shall be carried out and completed in accordance with the agreed particulars’

The Permitted Development application was varied on 7th June 2019, when the Board determined that in accordance with section 146B(3)(a) of the Act, the previously issued planning consent for the permitted wind farm development could be altered in accordance with the plans and particulars received on 14th day of February, 2019. This permitted the applicant to utilise a larger turbine rotor diameter but which remained within the consented design envelope and parameters (i.e. tip-height of 156.5m, with no alteration to permitted layout).

Construction work commenced on the Meenbog Wind Farm in November 2019. Approximately 90% of the civil engineering works, including wind farm access roads, turbine hardstands, turbine foundations, borrow pits and peat cells, were completed over the following 12-month period up to November 2020. Works on the electricity substation and associated underground cabling connection to the grid continued until completion in the second quarter of 2021.

On 12th November 2020, during the construction of a permitted access road to turbine T7, a peat slide or peat failure occurred within the Wind Farm Site (November 2020 Peat Slide). The works that were underway at the time adjacent to where the peat slide occurred, were fully permitted and were being undertaken in line with the project design that had been subject to both EIA and AA. Following the November 2020 Peat Slide, a multi-agency investigation of the incident was led by the Environmental Protection Agency (EPA). During this investigation the EPA engaged the services of ARUP Consulting Engineers, to advise and represent the EPA on the geotechnical and peat stability aspects of the investigations.

Following the November 2020 Peat Slide, a number of deviations from the permitted plans for the Meenbog Wind Farm were identified by Donegal County Council (DCC). For the avoidance of doubt, since the November 2020 Peat Slide, and following investigations by DCC (and SLR on their behalf), EPA (and ARUP on their behalf), and Planree (and FTC and Ionic on their behalf), nothing has emerged to indicate that any deviation from the original permitted development was in any way responsible for the November 2020 Peat Slide.

A programme of remedial works to address the effects of the November 2020 Peat Slide were undertaken required by of a direction issued by Donegal County Council (DCC) under Section 12 of the Local Government (Water Pollution) Act, 1977 and therefore fall within the scope of Schedule 2, Class 41 of the Planning and Development Regulations 2001 (as amended) as Exempted Development. For this reason, these remedial works are not considered part of the Existing Development but are considered cumulatively in this EIAR.

Following extensive additional site investigation work, geotechnical analysis, site meetings and reporting undertaken by both Fehily Timoney and Company and Ionic Consulting Ltd. (now AFRY Ireland Ltd) on behalf of Planree, and review by ARUP on behalf of the EPA, the EPA, by notice dated 28th September 2021, concluded that “*The issues identified in correspondence from the EPA on the 29th July 2021 have been satisfactorily addressed. Compliance with the EPA Direction from 1st April is now confirmed. It is important that the mitigation measures proposed are implemented for the remaining works to be completed at the site. The detailed design for civil works should be informed by this updated assessment*”.

On 7 July 2022, the DCC Environment Section issued a letter confirming their satisfaction with the peat slide remediation works and closing the Section 12 notices issued. Following the closure of the Section 12 notices, works recommenced at the Wind Farm Site the second half of 2022. During this period additional works were carried out on site roads, internal site ducting, hardstanding areas, borrow pits, and peat cells. This works ceased following a direction to cease works from DCC.

On 3rd April 2023 the DCC Planning Section commenced Section 160 proceedings against Planree Ltd to stop works on-site on the basis that unauthorised development had taken place. A High Court judgement delivered on 10th of April 2024 found that as a result of the deviations from the consented plans, the entire development, as constructed to date, was considered unauthorised development. This decision was upheld by the Court of Appeal in a ruling issued on 18th of December 2024. This has led Planree limited to seek substitute consent to retain the entire windfarm as constructed to date, the Existing Development, and to seek permission to finish the Windfarm i.e. the Prospective Development, together the Subject Development.

2.8.2

Planning Applications within the Red Line Boundary

This section of the EIAR sets out the relevant planning applications within the red line boundary of the application, with the results of the cumulative search being detailed in Appendix 2-1. There have been a range of planning applications lodged for developments within the overall footprint of the Site. Table 2-4 lists all the valid applications within the application Site boundary.

Table 2-4 Planning applications within the Site boundary.

Planning Authority	Pl. Ref	Description	Decision
Donegal County Council	11/20064	Development comprising of a gas insulated switchgear (gis) 110kv electrical switching substation measuring approximately 25m x 20m, a compound area measuring approximately 41m x 40m surrounded by a 2.6m high palisade fence, four end masts, a landscaped earth berm with approximate dimensions of 11m at the base and 7m at the highest point, domestic effluent treatment facility, associated site roads and site works	Granted 23/05/2011 (Partly within the RLB)
Donegal County Council	15/50765	Erection of 2 no. 16m high monopole lightning protection masts and associated site works on the consented clogher substation site (donegal county council planning ref. no. 11/20064). the planning application is accompanied by an appropriate assessment screening report.	Granted 04/09/2015 (Partly within the RLB)
Donegal County Council	16/50348	Retention: an 80 metre high temporary meteorological mast and all associated works for a period of 18 months	Granted 17/06/2016
Donegal County Council	16/50585	an 80 metre high temporary meteorological mast and all associated works for a period of 18 months	Granted 22/07/2016

Donegal County Council	17/50543	A 10 year planning permission for development consisting of (1) a 110kv electricity substation which includes 2 no. control buildings, associated electrical plant and equipment, underground electricity cabling, fencing and ancillary works in the townland of cark to replace two substations previously permitted as part of the drumnahough wind farm (pl.ref.08/50687 and extended under pl. ref.13/51609) and the lenalea wind farm (pl.ref.09/50116); (2) 33kv underground electricity cabling and ancillary works from the permitted lenalea wind farm to the proposed substation in the townland of cark; (3) 110kv underground electricity cabling and ancillary works from the proposed substation at cark through the townlands of culliagh, meenbog (ed cloghan), lettershanbo, corlacky, kinnaderry, welchtown, aghaveagh, meenagrauv, altnapaste, ballykergan, carrickmahon, magheracloigh, loughsallagh, cashelnavean, croaghonagh, tawnawully mountains, keadew upper, friarbush, ardinawark, keadew lower, to the existing clogher substation in the townland of cullionboy, co. donegal; (4) the demolition of an existing shed and its replacement with a new shed, both in the townland of cullionboy, relocated to facilitate the proposed underground cabling works. the planning application is accompanied by an environmental impact statement (eis) and natura impact statement (nis)	Refused by DCoCo 02/06/2017 Refused by ACP 19/07/2018 (Partly within the RLB)
Donegal County Council	*24/60495	Construction of 3 no. new culverts to replace existing culverts and all associated site works along the n15. a natura impact statement accompanies this application.	Refused by DCC 13/12/2024 Refused by ACP 12/06/2026
An Coimisiún Pleanála	PA0040	Provision of up to 49 no. Wind Turbines, two permanent Meteorological Masts, two 110kv Electrical Substations and all associated works at Meenbog and other townlands, County Donegal.	Refused 23/03/2016
An Coimisiún Pleanála	300460	10-year permission for a 19 turbine windfarm, 110kV substation & 110kV underground grid connection	Granted 25/06/2018
An Coimisiún Pleanála	248796	10-year permission for development. Underground electricity cabling from Lenalea windfarm to substation in Cark. 110kV cabling from substation in Cark to Clogher Substation, Cullionboy, Cark, Co. Donegal	Refused 25/07/2018 (Partly within the RLB)
An Coimisiún Pleanála	314062	Leave to Apply for Substitute Consent for alterations to the permitted Meenbog Wind Farm	Granted 13/10/2023
An Coimisiún Pleanála	319466	Substitute Consent application for 25 no. deviations from the permitted Meenbog Windfarm development (granted under ABP PA05E.300460).	Withdrawn 21/02/2025
An Coimisiún Pleanála	318669	Request for an Extension of Time for an Application for Substitute Consent for a windfarm.	Granted 12/01/2024

An Coimisiún Pleanála	321436	Request to enter into pre-application consultation pursuant to Section 177E(1A) of the Planning and Development Act, 2000, as amended.	Lodged 10/12/2024
An Coimisiún Pleanála	318022	Substitute Consent Application - Quarry.	Live Case (Partly within the RLB)

* The proposed replacement of 3 no. culverts along the N15 is functionally independent from the Subject Development. The Subject Development does not require the culvert upgrade works to operate. The Grid Connection underground cabling along the N15 is fully constructed and energised.

2.8.3

Wind Energy Developments within 25km of the Proposed Turbines

A planning search was carried out to establish existing, permitted and proposed wind energy developments within 25km of the proposed turbines for the purposes of informing the potential cumulative effects (see Section 2.8 of this Chapter for further details). The search was carried out using the relevant local authority planning portal and An Coimisiún Pleanála's portal in June 2026 for relevant planning applications. These are outlined in greater detail in Table 2-5 below.

Table 2-5 Wind Energy Developments within 25km of the proposed turbines

Planning Ref.	Applicant	Description	Decision	Status	No. of Turbines	Approximate Distance to Nearest Turbine (km)
Existing & Permitted Wind Farms						
Cark						
Donegal CC Pl. Ref. 95/1310	B9 Energy Services Ltd/ Renewable Energy Systems Ltd	Provision of a wind energy project comprising 12 turbines, one anemometer, service tracks and control room	Granted by DCC 10/11/1995	Existing	12	16.7km
Donegal CC Pl. Ref. 96/780	B9 Energy Services Ltd/ Renewable Energy Systems Ltd	Erection of windfarm comprising thirteen turbines, access tracks, one anemometer, a temporary site compound, underground cabling and all ancillary structures	Granted by DCC 26/07/1996	Existing	13	17.4km
Donegal CC Pl. Ref. 01/8262	Wind Farm Developments Ltd	Extension to wind farm comprising of up to 10 x turbines & associated transformers, a permanent meteorological mast, access tracks & gates, borrow pits, site control room & substation, electrical cabling, site signage, a temporary site compound & site works	Granted by DCC 13/05/2022	Existing	4	16.7km
Cark/Largymore						
Donegal CC Pl. Ref. 02/8328	National Management Centr Airtricity Developments (Ireland) Ltd	Construction of a wind farm consisting of 13 wind turbines (9 with a hub height of 65m and 4 with a hub height of 45m a 20 kv electrical control building a 60m high wind monitoring mast construction and upgrading of site entrances site trackways burrow pits an associated works	Granted by DCC 06/01/2003	Existing	9	16.8km
Drumnahough						
An Coimisiún Pleanála Pl. Ref. 308806	Drumnahough Wind Farm DAC	Construction of windfarm (12 turbines) with associated works	Granted by ACP 29/08/2022	Existing	12	16.2km

Planning Ref.	Applicant	Description	Decision	Status	No. of Turbines	Approximate Distance to Nearest Turbine (km)
Meentycat						
Donegal CC Pl. Ref. 01/8038	Eirtricity Developments Ltd	Erection of windfarm, comprising 15 no. wind turbines and towers, 1 no. meteorological mast, electricity sub-station and compound, on site excavation of rock material together with all associated site works and entrances	Granted by DCC 24/09/2001	Existing	9	14.8km
Anarget						
Donegal CC Pl. Ref. 96/1342	Richard Timoney	Erection of 3 wind turbines	Granted by ACP 11/04/1997	Existing	3	17.8km
Donegal CC Pl. Ref. 03/103	Energen Ltd	Development of a 1.2 megawatt wind farm including 2 no. 600 kilowatt wind turbines with a hub height of 46 metres & a blade diameter of 42 metres; associated access roads & hard standing areas; 2 no. esb metering cubicles measuring 2.4 metres long x 2.4 metres wide x 2.4 metres high, on site under ground cables connecting the 2 turbines to the existing electrical infrastructure serving adjacent windfarm & ancillary drainage works & all other site development works above & below ground	Granted by ACP 04/06/2003	Existing	2	18.1km
Donegal CC Pl. Ref. 05/20375	Meenacloghspar (Wind) Limited	development and operation of a 4.0-megawatt (mw) wind farm including 5 no. 800 kilo watt wind turbines with a hub height of 50 metres and a blade diameter of 48 metres, associated access roads and hard standing areas, ancillary drainage works, and all other works	Granted by DCC 16/01/2005	Existing	1	17.8km
Altlow Turbine						
Donegal CC Pl Ref. 11/20428	Reforce Energy Ltd	Erection of a single electricity generating wind turbine of hub height up to 45m and rotor diameter up to 44m, a hardstanding, control building, associated site roads, drainage and site works	Granted by DCC 31/07/2012	Existing	1	13.2km

Planning Ref.	Applicant	Description	Decision	Status	No. of Turbines	Approximate Distance to Nearest Turbine (km)
Meenanilta						
Donegal CC Pl. Ref. 01/8143	Redwind Energy Ltd	Erection of 3 no. Wind turbines 49m. Hub height, 52m. Rotor diameter, a 10 kv. Substation building, access roadways on a site of 21.6 acres. Vehicular access to the dev. Shall be via the existing farm access gate, to be upgraded to accom. The dev.	Granted by DCC 28/08/2001	Existing	3	12.9km
Donegal CC Pl. Ref. 01/8305	Redwind Energy Ltd	Part a of proposed windfarm comprising of 4 no. Wind turbines of 49-hub height & 52 m rotor diameter, 4m wide access tracks on a site of 2.52 hectares (6.4 acres) with vehicular access via existing country road and trackways	Granted by DCC 04/03/2002	Existing	3	12.8km
Donegal CC Pl. Ref. 04/9275	Redwind Energy Ltd	Construction of 4 no. wind turbines 49m hub height, and 52m rotor diameter access trackways 4.5m in width, a stone quarry of 0.1hect. and associated site development works	Granted by DCC 22/10/2004	Existing	4	12.5km
Ballystrang						
Donegal CC Pl Ref. 06/21459	Eirtricity Developments Ltd	Erection of wind farm development comprising 9 no. 65m high masts including turbines, 1 no. 65m high meteorological mast, 20kv switch room and quarry for the excavation of rock material on site, site access works and site entrance	Granted by DCC 15/07/2002	Existing	6	17km
Meenadreen						
Donegal CC Pl. Ref. 99/1257	Whaplode Ltd	Erection of four wind turbine generators, 45-55m in height, with rotor diameters not exceeding 55m and a wind measuring mast, height not exceeding 50m., together with site roads, site notice boards, control build. and anc. equip. for generating elect	Granted by ACP 15/12/1999	Existing	5	6.7km
Donegal CC Pl. Ref. 04/1462, EOD-12/50108	Eco Wind Power Ltd	Construction of extension (to an existing windfarm ref no.99/1257(pl05.116924)) of 5 turbine generators, 70m in height with rotor diameter up to 84m and a wind measuring mast, height up to 70m together with the site	Granted by ACP 16/11/2006	Existing	2	6.7km

Planning Ref.	Applicant	Description	Decision	Status	No. of Turbines	Approximate Distance to Nearest Turbine (km)
		roads, site notice boards, a control building with a fenced compound and parking for up to 10 vehicles and ancillary equipment for generating electricity together with associated site services				
Clogheravaddy						
Donegal CC Pl. Ref. 14/51305	Clogheravaddy Wind Farm Ltd	Ten-year duration for development of a wind energy project comprising up to seven wind turbines, construction of new internal access tracks, upgrading existing access tracks, a new site entrance (on the 15795 local road), underground cabling, electrical	Granted by ACP 19/02/2016	Existing	7	24km
Culliagh						
Donegal CC Pl. Ref. 97/1740	Dedondo Ltd/Seamus & John Herron	Erection of 18 no. 45-meter-high wind turbine masts, transformer compound and associated single storey control room together with excavation of rock for construction of service roads, for electricity generating windfarm	Granted by ACP 22/07/1998	Existing	18	14.9km
Donegal CC Pl. Ref. 12/60076	SEE Renewables (Ireland) Ltd	Relocation of three wind turbines, including bases and transformers, previously permitted under planning ref 08/60410, up to 45m from the permitted existing locations.	Granted by DCC 26/07/2012	Existing	3	14.7km
Lenalea						
Donegal CC Pl. Ref. 09/50116, 20/50835	Airtricity Developments (Ireland) Ltd and Coillte Teoranta	Construction of wind farm, consisting of 9 wind turbines of up to 85m hub height and up to 100m blade diameter with a total height not exceeding 135m, a permanent meteorological lattice mast 85m high, a substation and associated equipment, a borrow pit, i	Granted by DCC 25/01/2010	Existing	7	17.4km
Barnesmore						
Donegal CC Pl. Ref. 95/914	Scottish Power PLC	26 no. 40m high wind turbine masts, transformer compound with associated single storey switch room building and service roads for an electricity generator	Granted by ACP 16/08/1996	Existing	25	2km

Planning Ref.	Applicant	Description	Decision	Status	No. of Turbines	Approximate Distance to Nearest Turbine (km)
		windfarm at Keadew Keadew Upper Barnesmore in accordance with the plans submitted with the application.				
An Coimisiún Pleanála Pl. Ref. 306303	ScottishPower Renewables (UK) Ltd.	Decommissioning and removal of 25 existing wind turbines and the construction of up to 13 wind turbines and all associated site development and ancillary works including upgrade works associated with the existing 110kV grid connection and widening of junction and local road	Granted by ACP 27/01/2021	Existing	13	2km
Crilly						
Donegal CC Pl. Ref. 13/51404	Provento Ireland Public Limited Company	A ten year duration for the construction and operation of 4 no. wind turbines with maximum blade diameter of 93 metres and a maximum blade tip height of 126.5 metres, external wind turbine transformers, communications antennae, an electrical control building, turbine hardstands, a temporary contractors compound, new access tracks and the upgrade of existing tracks, a new site entrance, drainage works including drainage channels and silt traps along the access track, under ground electrical cables, a permanent meteorological mast 80 metres in height, and all ancillary developments and associated site development works. the proposed development includes an access off seegronan road, killeter, castlederg, co tyrone and proposed temporary road widening and improvement works on sections of the transport route in northern ireland along seegronan road and crillys hill road within meenamullan, seegronan, crillys hill and killeter townlands, killeter, castlederg co. tyrone	Granted by ACP 30/08/2016	Existing	4	13.8km
Croaghanmeal						

Planning Ref.	Applicant	Description	Decision	Status	No. of Turbines	Approximate Distance to Nearest Turbine (km)
Donegal CC Pl. Ref. 04/1461	Eco Wind Power LTD	Construction of 8 wind turbine generators, 70m in hub height with rotor diameter up to 84m and a wind measuring mast, height up to 70m together with the site roads, site notice boards, a control building with a fenced compound and parking for up to 10 vehicles and ancillary equipment for generating electricity together with associated site services	Granted by ACP 23/08/2007	Existing	7	6.2km
Lough Cuill						
Donegal CC Pl. Ref. 12/50866	M.D. South Windfarm Ltd	Grant of a ten year planning permission for development of an eleven (11) turbine wind farm. The development will comprise of eleven (11) electricity generating wind turbines with a hub height of up to 74 metres and a rotor diameter of up to 93 metres. the overall height of the turbines will not exceed 115 metres. the development will also comprise of hardstandings, an electrical compound and substation building, associated site roads and site works. it is proposed to source all stone from two on site borrow pit areas	Granted by ACP 10/02/2014	Existing	8	6.2km
Meenahorna						
Donegal CC Pl. ref. 02/8373	Airtricity Developments (Ireland) Ltd	Construction of a wind farm consisting of 9 wind turbines with a hub height of 60m, a 20 kv electrical control building, a 60m high wind monitoring mast, construction & upgrading of a site entrance, site trackways, borrow pits & associated works	Granted by DCC 03/02/2003	Existing	7	13.6km
Meenalaban						
Donegal CC Pl. ref. 02/8008	Eirtricity Developments Ltd	Erection of wind farm development comprising 9no. 65m high masts including turbines, 110kv electricity substation building & compound with 2m high perimeter fencing and septic tank , quarry for the exc. of rock material on site, site access wks & ent	Granted by DCC 22/04/2002	Existing	7	14km

Planning Ref.	Applicant	Description	Decision	Status	No. of Turbines	Approximate Distance to Nearest Turbine (km)
Straness						
Donegal CC Pl. Ref. 04/1526	Eco Wind Power Ltd	Erection of 28 wind turbine generators, 70m in height with rotor diameter up to 84m and 2 wind measuring masts, height up to 70m together with the site roads, site notice boards, a control building with a fenced compound and parking for up to 10 vehicles and ancillary equipment for generating electricity together with associated site services	Granted by ACP 23/08/2007	Existing	21	6.1km
Corkermore Extension						
*Donegal CC Pl. Ref. 01/846	Conor Ronan	Erection of 14 no. wind turbine generators 60m. high with a rotar diameter not exceeding 62m. & a wind measuring mast not exceeding 60m., site roads & site boards, a controlled building with a fenced compound, parking & ancillary equipment	Granted by DCC 25/03/2002	Existing	5	N/A
Killin Hill						
*Donegal CC Pl. Ref. 06/21459	Killin Hill Windfarm Limited	Construction of 3 no. wind turbines, 64 metre hub height, and 71 metre rotor diameter, access trackways 4.5 meters in width, a 38kv substation, a 40 metre high meteorological measuring mast and associated site development works	Granted by ACP 16/01/2008	Existing	3	N/A
Altcor, Inver						
*Donegal CC Pl. Ref. 20/51028	Huntstown Windfarm Ltd	Erection of 3 no. wind turbines with a hub height up to 69m and a maximum blade tip height up to 110m, underground cabling, borrow pit, together with associated access roads, hardstands, clearfelling of trees and site works. the development proposes a grid connection via an electrical connection into the nearby killen hill 38kv sub station consisting of c.1,245m of underground ducted cable in the townlands altcor and meenagranoge and an extension to killin hill 38kv sub station in meenagranoge. a natura impact statement accompanies this application	Granted by ACP 27/05/2021	Permitted but not constructed	3	N/A

Planning Ref.	Applicant	Description	Decision	Status	No. of Turbines	Approximate Distance to Nearest Turbine (km)
Derrykillev						
*Donegal cc Pl. Ref. 14/51400	Derrykillev Community Wind Farm Ltd	A grant of a ten year planning permission to construct a five (5) turbine wind farm, the development will comprise of up to 5 no electricity generating wind turbines with an overall height of the turbines not exceeding 150 metres. the development will also comprise of hardstandings, an electrical compound and sub -station building with grid system services equipment, associated site roads and site works. the planning application is accompanied by an environmental impact statement (eia) and a screening for appropriate assessment report.	Granted by ACP 18/03/2016	Permitted but not constructed	5	N/A
Graffy						
An Coimisiún Pleanála Pl. Ref. 322673	Cuilfeach Teoranta	A 10 year permission for an amended wind farm development PL05B.237656. An Environmental Impact Assessment report (EIAR) and Natura Impact Statement (NIS) accompanies this application.	Pending	Proposed	8	19.2km
Altnagapple						
*Donegal CC Pl. Ref. 26/60905	Mulmosog Wind Limited	(1) erection of three 4.5 megawatts (mw) wind turbines with a blade tip height of 150m consisting of a rotor diameter of 136m and a hub height of 82m, (2) erection of one 4.2 megawatts (mw) wind turbine with a blade tip height of 135m consisting of a rotor diameter of 117m and a hub height of 76.5m, (3) construction of turbine foundations, crane hardstand areas and assembly areas, (4) construction of 1 no. permanent 38kv electrical onsite substation and control building compound including a single-storey control building with welfare facilities, all associated electrical plant and equipment, security fencing, gates, all associated underground cabling, wastewater holding tank,	Pending	Proposed	4	N/A

Planning Ref.	Applicant	Description	Decision	Status	No. of Turbines	Approximate Distance to Nearest Turbine (km)
		and all ancillary structures and works in the townland of corker more, (5) provision of a new junction with access from the n56 in the townland of meenavally, including the removal of existing vegetation for visibility splays to facilitate the use of it for the delivery of construction materials to the site, (6) construction of 2 site entrances, one on the local access road to the west of the l8063 to access the main wind farm site and one on the l5635 (meenagolan road) to access the 38kv onsite substation and control building, (7) construction of 1 no. new bridge on the access road from the new junction on the n56 and 1 no. bridge upgrade on the local road l8063 in the townland of meenavally, (8) construction of new internal site access tracks (both excavated and floating) and upgrade of existing site access tracks, (9) development of a site drainage network, (10) 1 no. permanent meteorological mast of c.85m in height, and associated foundation and hard-standing area in the townland of meenavally, (11) construction of two temporary construction compounds for use during construction, (12) all associated wind farm internal cabling which consists of over and underground electrical and communications cabling connecting the turbines, met mast and the onsite substation and control building (13) a new 38kv cable will extend underground for approximately 357m from the onsite substation and control building to connect to the national grid in the townland of corker more via existing overhead lines through the erection of 2 no. end masts of 12m height, (14) two on-site borrow pits, (15) amenity access for the wider community				

Planning Ref.	Applicant	Description	Decision	Status	No. of Turbines	Approximate Distance to Nearest Turbine (km)
		and biodiversity enhancement measures, (16) minor tree felling to facilitate the construction and operation of wind farm internal cabling from the turbines to the onsite substation and control building, (17) operational stage site signage and (18) all ancillary site development works above and below ground, including soft and hard landscaping and drainage infrastructure. a ten year permission and a 40 year operational period is sought from the date of overall commissioning of the entire wind farm. however, part of the substation and all of the grid connection will be owned and operated by esb networks and as part of the national grid infrastructure, their life can extend beyond the life of the wind farm. accordingly, permission is sought for the grid connection and onsite substation and control building in perpetuity. an environmental impact assessment report (eiar) and natura impact statement (nis) accompanies this application. the development is covered by the provisions of the (red iii) renewable energy directive iii (directive (eu) 2023/2413)				
Wind Farms in Northern Ireland						
TYRONE						
Altgolan						
Derry and Strabane Pl. Ref. LA11/2022/0895/F		Planning application for new Altgolan Wind Farm consisting of 5 No. wind turbines with a tip height of up to 149.99 Metres, new access tracks, widening of existing tracks, hardstanding areas, a control building and all associated ancillary infrastructure. The proposal will have an operational period of 35 years from the date the wind farm is connected to the electricity grid. Previous consents	Pending	Proposed	5	15.6km

Planning Ref.	Applicant	Description	Decision	Status	No. of Turbines	Approximate Distance to Nearest Turbine (km)
		relating to Altgolan Wind Farm are 2012/A0070 (J/2006/0840/F), LA11/2017/0649/F, LA11/2018/1004/F and LA11/2020/0916/NMC. The current application proposes an amendment to the wind turbine dimensions, including an increase in wind turbine tip height from 125 Metres to up to 149.99 Metres, slight amendments to the consented locations of the wind turbines and minor alterations to the previously consented access track layout, hardstanding design and control building location. The application will also change the wind farm operational period from 30 years to 35 years from the date the wind farm is connected to the electricity grid. Further Environmental Information Received (addendum to Environmental Statement - FEI Part 1 and Part 2; Noise Impact and Bird Impact (RSPBV3))				
Clunahill						
Fermanagh and Omagh Pl. Ref. LA10/2024/1174/F	Pigeon Top Wind Farm Ltd	Proposed amendments to previously approved wind farm (K/2007/0547/F re. Clunahill Wind Farm, LA10/2019/1323/F re. new site entrance and LA10/2021/1088/F re. underground cable ducting) comprising 6no. turbines and associated infrastructure, including proposed change in turbine dimensions (tip height up to 142.5m and rotor diameter up to 117m), reconfiguration of turbine siting, reconfiguration of internal access route tracks and proposed amendments to the approved substation; proposed electrical compound / switchyard, met mast, temporary construction compound, borehole, delivery route junction improvements, access onto Glenbane Road and all associated ancillary works.	Pending	Proposed	6	24.5km

Planning Ref.	Applicant	Description	Decision	Status	No. of Turbines	Approximate Distance to Nearest Turbine (km)
Meenakeeran						
Derry & Strabane Pl. Ref. LA11/2025/0701/F	Alice Murphy	Construction of a Wind Farm comprising 5no. wind turbines (Maximum 150 metres to blade tip), crane pads, electrical substation/control building, battery energy storage system (BESS), access tracks, turning heads, underground cables, temporary construction compound, soil deposition areas, delivery route junction improvements and passing bays, a new access onto Tullycar Road.	Pending	Pending	5	3.3km
Meenamullan						
Derry City & Strabane Pl. Ref. LA11/2025/0610/PAN	Mennanullan Windfarm Ltd	Planning application for the Meenamullan Wind Farm comprising up to 6 No. wind turbines, each with a tip height of up to 180 metres, an upgraded site entrance, new access tracks, widening of existing tracks, crane hardstanding areas, delivery route improvements, and passing bays, 1 No. control building and associated substation compound (at one of two alternative locations), underground cabling, a temporary construction compound, soil deposition areas, forestry clearance works, and all associated ancillary infrastructure, ground and site works. The proposal will have an operational period of up to 35 years from the date the wind farm is connected to the electricity grid	Acceptable	Pending	6	12.6km
Pullytean						
DFI Pl. Ref. SPD/2025/0040/F	Pullytean Wind Farm Ltd	Wind farm comprising 7 no. turbines (up to 150m tip height) and battery energy storage system (BESS), crane pads, substation building and compound, access tracks, lay down and storage areas, turning heads, underground cables, temporary construction compound, spoil storage areas, delivery haul route improvements and passing bays,	Pending	Pending	7	9.2km

Planning Ref.	Applicant	Description	Decision	Status	No. of Turbines	Approximate Distance to Nearest Turbine (km)
		proposed new site access from Ballymongan Road and all associated ancillary site works				
Bin Mountain						
Derry & Strabane Pl. Ref. J/2004/0295/F	Airtricity Developments NI Ltd	Proposed Wind Farm Development comprising the erection of a maximum of 6 turbines (maximum height 92.25m above finished ground level to blade tip - maximum hub height of 57m above finished ground level), associated transformers, new and upgraded tracks, sub-station building, electrical cabling, permanent anemometer mast 57m above finished ground level, site signage (for safety and information), all associated ancillary works and car parking.	Granted 26/01/2006	Existing	6	18.2km
Castlecraig						
Fermanagh & Omagh Pl. Ref. K/2006/1934/F	Ms Lucy Ford-Hutchinson	Amendment to proposed wind farm including reduction from 25 wind turbines to 10 turbines (each with a maximum overall height of up to 127m) and associated transformers, site entrance with visibility splays, permanent anemometer mast, a temporary anemometer mast, new site access tracks, crane hard standings, a site control room and substation, a temporary site compound, electrical cabling, road improvement works and all other ancillary works.	Granted 13/04/2011	Existing	10	20.5km
Church Hill						
Derry & Strabane Pl. Ref. J/2005/0358/F	Trish Kelly	Construction of a wind farm consisting of 8 turbines (Total height 99.9m to tip - 61.4m hub height), a permanent 60m anemometer mast, access tracks, gates, site control room, substation and cabling.	Granted 02/05/2007	Existing	8	11.2km

Planning Ref.	Applicant	Description	Decision	Status	No. of Turbines	Approximate Distance to Nearest Turbine (km)
Derry & Strabane Pl. Ref. J/2013/0183/F	Viridian Renewables Company No 1	The proposed development consists of a single wind turbine extension to the operational Church Hill Wind Farm (J/2005/0358/F). The proposal includes for the erection of 1 no wind turbine with a base to blade-tip height of 99.5m, a wind turbine transformer located internally or underground, a turbine hardstand, the upgrade of an existing access track and construction of a section of new access track, drainage management measures, underground communication and electrical cables linking the proposed turbine with the operational Church Hill Wind Farm, and all associated works and ancillary developments.	Granted 08/04/2019	Existing	1	12km
Crighshane						
Derry & Strabane Pl. Ref. J/2005/0133/F	Trish Kelly	Construction of a windfarm consisting of 14 turbines (Total height 99.9m to tip - 61.4m hub height), a permanent 60m anemometer mast, access tracks, gates, site control room, substation and cabling	Granted 02/05/2007	Existing	14	8.1km
Gronan						
DFI Pl. Ref. J/2007/0667/F	Gronan Wind Farm Ltd	Wind farm consisting of 4 wind turbines each with a maximum overall base to blade tip height of 125 metres. Ancillary developments include turbine transformers located internally or externally; turbine hardstands, widening and strengthening of an existing site entrance; an electrical control building with communications antennae; construction of new and amended access tracks and junctions; underground electrical cables and communications lines connecting wind turbines to the control building; on site drainage works; temporary site	Granted 20/12/2018	Existing	4	12.1km

Planning Ref.	Applicant	Description	Decision	Status	No. of Turbines	Approximate Distance to Nearest Turbine (km)
		compound; installation of an 80 high permanent met mast and all ancillary and associated works.				
Lough Hill						
Fermanagh & Omagh Pl. Ref. K/2004/1139/F	Wind Farm Developments Ltd	Development of wind farm in substitution for approved development (K/2001/0458) involving the substitution of 7 approved turbines and their associated transformers with 6 new turbines (each with a maximum overall height of 83m) and their associated transformers, the substitution of the approved location of the permanent anemometer mast with a new location, 2 temporary anemometer masts, the substitution of the approved layout of access tracks with a new layout and the substitution of the site control room and substation.	Granted 08/11/2005	Existing	6	18.9km
Seegronan						
Derry & Strabane Pl. Ref. J/2006/0883/F	Mrs Doreen Walker	Amendment to Wind Farm proposal including reduction from 9 wind turbines to 6 turbines with steel towers and composite fibre rotor blades and a reduction in overall max base to blade-tip height from 125 m to 110m. (hub height - 70m, 71m blade diameter). The development will also include wind turbine transformers located internally or underground, turbine hardstands, strengthening and widening of an existing site entrance and existing access roads, construction of new on-site access roads, drainage, an electrical control building, communications antennae; underground electrical cables and communication cables, all related site works, drainage management measures and ancillary developments. Drainage management measures, including silt traps and side drains will be installed along the access tracks and hardstands.	Granted	Existing	6	12.9km

Planning Ref.	Applicant	Description	Decision	Status	No. of Turbines	Approximate Distance to Nearest Turbine (km)
Derry City & Strabane Pl. Ref. J/2013/0187/F	Seegronan Windfarm Ltd	J/2013/0187/F The proposed development consists of the erection of 3 no. wind turbines with a base to blade tip height of up to 110m as an extension to the consented Seegronan Wind Farm (Planning Application Ref. J/2006/0883/F). The development will also include turbine bases, wind turbine transformers located externally, turbine hardstands, new site entrance off Meenamullan Road, strengthening and widening of and existing on-site track and the construction of new on-site track, on site drainage works and new drainage management measures, and underground electrical and communications cables linking the proposed turbines with the consented Seegronan Wind Farm, and all associated works and ancillary developments.	Granted	Existing	3	11.8km
Slieveglass						
Derry & Strabane Pl. Ref. J/2008/0088/F	Slieveglass Windfarm Ltd	Wind Farm consisting of 3 wind turbines of up to 2.3 MW power output with a hub height of 64m, blade diameter of 71m and a maximum overall base to blade tip height of 99.5m. Ancillary developments include, turbine transformers, revised electrical control building/substation, widening/strengthening of existing tracks, construction of new access tracks, junctions and site entrance, turbine hardstands, underground electrical cables and communication lines, drainage works, relocation of proposed temporary site compound and all other ancillary and associated works.	Granted	Existing	3	20.4km
*Fermanagh & Omagh Pl. Ref. LA10/2026/0178/PAN	Energia	Slieveglass Extension Wind Farm, consisting of 5 No. wind turbines, each with a tip height of up to 150 Metres, new access tracks, widening of existing tracks, crane hardstanding areas, a control building and substation	Pending	Proposed	5	N/A

Planning Ref.	Applicant	Description	Decision	Status	No. of Turbines	Approximate Distance to Nearest Turbine (km)
	Renewables Company 1 Ltd	compound, underground cables, and all associated ancillary infrastructure, within the Fermanagh Omagh District Council administrative area. The development also includes related works within Derry City and Strabane District Council administrative area, including the use, extension, and upgrade of existing access tracks, and upgrade of the existing site entrance within Bullock Park townland to facilitate access to Slieveglass Extension Wind Farm site. The proposal will include delivery haul route improvements and passing bays, and have an operational period of up to 40 years from the date the wind farm is connected to the electricity grid.				
Thornog						
Fermanagh & Omagh Pl. Ref. K/2005/1786/F	Thornog Windfarm Ltd	Amendment to proposed windfarm comprising 4 turbines (previously 5) each up to 2.3 MW power output (or 9.2MW total) with a steel tower and composite fibre rotor blades with a maximum base to blade tip height of 99.5 metres (64m hub height & 71m blade diameter), amended layout, access roads and location of borrow pit. The proposed development includes wind turbine transformers, turbine hardstands, new access entrance, strengthening and widening of existing access roads, construction of new access roads, temporary borrow pit, temporary spoil storage area, a drainage system, an electrical control building, a Yaggi antenna affixed to the electrical control building for data transmission, underground electrical cables linking the turbines with the electrical control building, underground communication cables and all related site works and ancillary development.	Granted	Existing	4	21.8km

Planning Ref.	Applicant	Description	Decision	Status	No. of Turbines	Approximate Distance to Nearest Turbine (km)
Fermanagh & Omagh Pl. Ref. K/2009/0243/F	Thomog Windfarm Ltd	Windfarm consisting of 4 wind turbines of up to 2.3 megawatt power output (or 9.2 MW total) each with a maximum overall base to blade-tip height of 99 metres; ancillary developments will comprise turbine transformers; turbine hardstands; construction of new access tracks and junctions; communications antennae, underground electrical cables and communications lines connecting wind turbines to an approved electrical control building; on site drainage works; and all ancillary and associated works.	Granted	Existing	4	21km
Tievenameenta						
Derry & Strabane Pl. Ref. J/2005/0104/F	Airtricity Developments (UK) Ltd	Amendment of original proposal including a reduction in turbine numbers from 22 to 15 turbines (maximum height of 110m above finished ground level to blade tip), associated transformers, new & upgraded access tracks, site access, haul route and passing bay provision on public roads, substation building and associated scada aerial equipment, electricity cabling, anemometer mast (65 metres above finished ground level), site signage (for safety information), all associated ancillary works and car parking	Granted	Existing	15	10.5km
Tappaghan						
*Fermanagh & Omagh Pl. Ref. L/2001/0377/F	Mr John Bratton	Construction & Operation of a Wind Farm - consisting of: 13 Wind turbine generators of dimension total height 99m (max blade tip height in 12 O'clock position) and breadth (rotor diameter) 70.5m and associated anemometry: Infrastructure required includes access roads, Crane hard-standings, reinforced concrete foundations, underground power cabling and transformers, Sub-station building and compound. The purpose of development is to generate a maximum 19.5MW of clean, renewable electricity utilising	Granted	Existing	13	N/A

Planning Ref.	Applicant	Description	Decision	Status	No. of Turbines	Approximate Distance to Nearest Turbine (km)
		the energy from the wind. The energy produced will be fed directly into the Northern Irish grid.				
Fermanagh & Omagh Pl. Ref. L/2006/1553/F	Airtricity Developments (UK) Ltd	Amendment to proposal to extend Tappaghan windfarm including a reduction from 8 to 6 turbines (each with a maximum overall height of 99.95m), associated transformers, a permanent anemometer mast, an extension to the existing substation, new access tracks and gates, electrical cabling, a temporary site compound and all ancillary works including extraction from the borrow pit on site to provide construction materials	Granted	Existing	6	
Dooish Curraghamulkin						
*Fermanagh & Omagh Pl. ref. K/2008/0334/F	Dooish Windfarm Ltd	Planning application for a wind farm at Carraghamulkin for 10 no.wind turbines each with a maximum overall base to blade tip height of 125metres. Ancillary developments will comprise turbine transformers located internally or externally; turbine hardstands; widening and strengthening of an existing site entrance; electrical control building; communications antennae on control building; widening of existing tracks; construction of new access tracks and junctions; underground electrical cables and communications lines connecting wind turbines to control building; on site drainage works; a relocated temporary site compound; installation of a 85m high permanent met mast and all ancillary and associated works (Further Environmental Information Received).	Granted	Not constructed	10	N/A

* In addition to the distances listed within 25km of the Wind Farm Site, an ornithological regional landscape buffer was created around areas of connected upland habitat above 100m, which represents a continuous area of habitat connectivity for birds. These windfarms are listed in the table above, but distances to the nearest turbine are not applicable and are therefore omitted.

2.9 Scoping and Consultation

2.9.1 Scoping

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

A scoping letter, providing details of the Subject Development, was prepared by MKO and circulated in September 2025 with follow up scoping requests sent in March 2026. The Scoping Consultee List for the 2017 EIAR informed the scoping for the Subject Development. MKO requested the comments of the relevant personnel/bodies in their respective capacities as consultees with regards to the EIAR and rEIAR process. The scoping letter provided details of the Subject Development and set out the scope of work for the EIAR and rEIAR. Consultees were invited to contribute to the EIAR and rEIAR by suggesting baseline data, survey techniques and potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR and rEIAR. All scoping responses from relevant personnel/bodies in their respective capacities as consultees are listed below and the relevant responses included as Appendix 2-1 of this EIAR and Appendix 2-1 of the rEIAR.

2.9.2 Scoping Responses

Table 2-6 lists the responses received to the scoping document circulated. Telecommunications operators were scoped at an earlier stage for the purposes of constraints mapping. Copies of all scoping responses received as of June 2026 are included in Appendix 2-2 of this EIAR. The recommendations of the consultees have informed the scope of the assessments undertaken and the contents of the EIAR. The responses received were fully considered and issues raised were followed up through contact with the respondent where clarification was necessary and addressed throughout the EIAR and rEIAR. Those bodies engaged with at scoping stage are set out below in Table 2-6.

Table 2-6 Scoping List and Responses

Consultee	Date of Response
AirNav	No response received
An Taisce	No response received
Bat Conservation Ireland	No response received
Birdwatch Ireland	No response received
City of Derry Airport	Response received 26 th March 2026
Commission for Regulation of Utilities, Water and Energy	No response received
Department of Agriculture, Environment and Rural Affairs (DAERA)	Response received 8 th September 2025. Follow up Response received on 27 th March 2026
Department of Agriculture, Food and the Marine	Initial response received 29 th of September 2025, follow up response received 31 st March 2026
Department of Climate, Energy and the Environment	No response received
Department of Culture, Communications and Sport	No response received

Department of Defence	Response received 25 th July 2025
Department of Health NI	No response received
Department of Housing, Local Government and Heritage	Acknowledgement email received 8 th September 2025 and response received 20 th October 2025
Department of Infrastructure Northern Ireland	Initial response received 28 th November 2025, follow up response received 26 th March 2026
Department of Transport	Response received 23 rd September 2025
Derry City and Strabane District Council	No response received
Donegal Airport	Response received 25 th March 2026
Donegal County Council – Environment Section	No response received
Donegal County Council – Heritage Section	No response received
Donegal County Council – Planning Section	Response received 20 th November 2025
Donegal County Council – Roads Section	Response received 8 th September 2025
Donegal County Council – Water Section	No response received
EirGrid	Response received 25 th March 2026
EPA Ireland	No response received
ESB Networks	Acknowledgement email received 23 rd March 2025 and response received 10 th April 2026
Fáilte Ireland	Response received 21 st October 2025
Fermanagh and Omagh District Council	No response received
Geological Survey of Ireland	Response received 19 th September 2025, follow up response received 24 th April 2026
Geological Survey of Northern Ireland	No response received
Health Service Executive (HSE)	Initial response received 3 rd October 2025, follow up response received 10 th of April 2026
Inland Fisheries Ireland	Initial response received 24 th October 2025, follow up response received 25 th March 2026
Irish Aviation Authority	Response received 26 th November 2025
Irish Peatland Conservation Council	Response received 17 th September 2025
Irish Raptor Study Group	No response received
Irish Red Grouse Association	No response received
Irish Wildlife Trust	Acknowledgement email received 29 th September 2025
Loughs Agency	No response received, however meeting held as detailed in Table 2-7 below
NIE Networks	Acknowledgement email received 3 rd April 2026
North Wester River Basin District	No response received
Northern Ireland Water	Acknowledgement email received 1 st April 2026
Office of Public Works	No response received
Royal Society for the Protection of Birds	Initial response received 8 th September 2025, follow up response received 31 st March 2026
Sport Ireland	No response received
Sustainable Energy Authority of Ireland	Initial Acknowledgement email received on 10 th September 2025 and further response received 15 th September 2025
The Heritage Council	No response received
Transport Infrastructure Ireland	Initial response received 17 th September 2025, follow up response received 31 st March 2026
Uisce Éireann	Response received 6 th October 2025
Waterways Ireland	Initial response received 8 th September 2025, follow up response received 2 nd April 2026
Telecommunications and Aviation Scoping	
RTÉ 2RN	Response received 27 th May 2025
AirNav	No response received

Airwave	Response received 22 nd July 2025
AP Wireless	Response received 6 th June 2025
BAI	Response received 27 th May 2025
BBNet	No response received
Beat 102-103	No response received
BT	Response received 22 nd of July 2025
Cellnex	Response received 27 th May 2025
Coimisiún na Meán	Response received 27 th May 2025
ComReg	Response received 22 nd July 2025
Defence Forces	No response received
Department of Defence	Response received 25 th July 2025
Digital Forge	No response received
Viatel	No response received
Dense Air	No response received
Donegal Airport	No response received
Donegal County Council	Response received 23 rd July 2025
EIR	Response received 29 th May 2025
Enet	Response received 27 th May 2025
ESB	Response received 25 th March 2026
FastCom	No response received
Hibernian Towers	Response received 6 th June 2025
Highland Radio	No response received
IAA	Response Received 26 th November 2025
Imagine Networks Services Ltd	Response received 27 th May 2025
IMS Connect	Response received 27 th May 2025
Irish Rail	Response received 22 nd July 2025
Ivertec	Response received 27 th May 2025
JFK	No response received
Murray Group	Response received 27 th May 2025
NBI	Response received 28 th May 2025
Ocean FM	No response received
Pure Telecom	No response received
Radio Services	No response received
Ripplecom	No response received
Tetra Ireland	Response received 9 th September 2025
Three Ireland Ltd	Response received 27 th May 2025
Towercom	Response received 6 th June 2025
Uisce Éireann	Response received 6 th June 2025
Virgin Media Ireland Ltd	Response received 27 th May 2025
Vodafone Ireland	Response received 28 th May 2025
Westnet	Response received 27 th May 2025
Whizzy Internet	No response received

Table 2-7 provides a summary of the details received from the consultees, where relevant queries were raised or information provided. The table also identifies the relevant chapter where the points raised by each of the consultees are addressed.

Table 2-7 Consultee responses and relevant chapters

No.	Consultee	Response received	Response Summary	Addressed in
1	City of Derry – Airport (CoDA)	No Response received on initial Scoping document. Follow up response received on 26/03/2026	CoDA has assessed the development and has no objection to this.	N/A
2	Department of Agriculture, Environment and Rural Affairs (DAERA) – Regional Office	Initial response received on 08/09/2025 Follow up response received on 31/03/2026	DAERA provided comments and advice under the following topic headings: Marine and Fisheries (Marine Licensing, Fish health and mitigation of suspended solids and stabilising land is required). Regulation Unit (Impacts from the foundations of wind turbines on groundwater environment, groundwater receptors should be identified and the risk of potential impact assessed, and where required, mitigation measures should be identified). Water Management Unit (Provided data sources and guidance documents to be used, recommended that the application provides clear details on effects to waterways and surface water disposal etc., and mitigation measures for the protection of the water environment and surrounding water bodies, recommends that the	Chapter 4 Description of the Prospective Development of the EIAR, and Appendix 4-3 CEMP of the EIAR, and Chapter 6 Biodiversity (Section 6.6.2) of the EIAR and Chapter 9 Hydrology and Hydrogeology (Section 9.1.3) of the EIAR. Chapter 4 Description of the Existing Development of the rEIAR, and Appendix 4-5 CEMP (2019), Chapter 6 Biodiversity (Section 6.6.2, Section 6.3.3.4) of the rEIAR.

No.	Consultee	Response received	Response Summary	Addressed in
			applications is compliant with the DAERA Standing Advice Pollution Prevention Guidance document). Natural Environment Division (Observations regarding salmon within the development site, and potential risks to surrounding hydrologically connected sites. Recommends various plans for the application (CEMP, Pollution Prevention Plan, Site Drainage Plan etc.). Full descriptions of points raised can be found in Appendix 2-1 Scoping Responses. No further comments in the follow up response.	
3	Department of Agriculture, Food and the Marine	Initial response received on 29/09/2025 Follow up response received on 31/03/2026	The Department made comments in relation general aspects to be considered in felling or removal of any trees as part of the Subject Development. No further comments in the follow up response.	Chapter 6 Biodiversity (Section 6.3.1) of the EIAR and Chapter 6 Biodiversity (Section 6.3.1) of the rEIAR.
4	Department of Defence (DoD)	Response received on 25/07/2025. No response on follow up.	The DoD acknowledged receipt of the scoping letter and a follow-up has not been received to date.	Chapter 15 Material Assets (Section 15.2.4.3) of the EIAR.

No.	Consultee	Response received	Response Summary	Addressed in
5	Department of Housing, Local Government and Heritage (DHLGH)	Response received on 08/09/2025 No response on follow up.	The Department recommends that an Archaeological Impact Assessment (AIA) should be carried out at an early stage of planning and design. The AIA should cover all project lands, include baseline studies, a landscape study, field surveys, visual impact assessment, and any intrusive advanced investigations. The AIA must include a full account of any and all archaeological works that were undertaken as part of the mitigation measures for those constructed elements for which substitute consent is sought and any archaeological findings from those works. The AIA/EIAR must include an archaeological impact statement and present appropriate mitigation to ensure the protection of the archaeological heritage, including the likely effects of the Subject Development. The Department emphasised that potential impacts during the decommissioning stage must be fully assessed, particularly where the AIA identifies vulnerable heritage in proximity to the Site, and mitigation measures for the construction and operation phases. Indirect and direct effects must be assessed also.	Chapter 14 Cultural Heritage (Section 14.1.5.2 and throughout Chapter 14.) of the EIAR and Chapter 14 Cultural Heritage throughout of the rEIAR.
6	Department of Infrastructure Northern Ireland (DfI)	Initial response received on 28/11/2025	Initial response: Under Regulation 30 of the Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017, the	Transboundary effects are considered throughout each chapter of the EIAR and rEIAR.

No.	Consultee	Response received	Response Summary	Addressed in
		Follow up response received on 26/03/2026	Department can enter into consultations with another European Economic Area state regarding the potential significant effects of a proposed project on the environment in Northern Ireland and the measures envisaged to reduce or eliminate such effects. Given the proximity of the development to the border with Northern Ireland, potential transboundary effects should be considered as part of the environmental impact assessment. Follow up response: DfI Rivers remit is limited to commenting on flood risk and drainage matters in accordance with the SPPS and Revised Planning Policy Statement 15 Planning and Flood Risk (Revised PPS 15). DfI Rivers requests that if any storm water runoff from the proposed development is discharged into cross border watercourse catchments that the discharge is limited to existing or green field runoff rates.	
7	Department of Transport	Response received on 23/09/2025. No response on follow up.	The Department advised that where the developer proposed the placement of any cables (or additional cables) in one or more trenches within the extents of the public road network, it is necessary to consider impacts on Road Authority and cost of works post construction, road stability and constructability assessments, future road space and utility accommodation,	Chapter 15 Material Assets (Traffic and Transport) (Section 15.1.2) of the EIAR and Chapter 15 Material Assets (Traffic and Transport) of the rEIAR.

No.	Consultee	Response received	Response Summary	Addressed in
			and operation and maintenance requirements with the Local Authority.	
8	Donegal Airport	No Response received on initial Scoping letter. Follow up response received on 25/03/2026	A representative from Donegal Airport noted that they have no comments to add to the Scoping letter.	N/A
9	Donegal County Council – Roads Section	Response received on 08/09/2025 No response on follow up.	The Department raised the concern that the grid connection is not fully constructed in relation to the permanent road reinstatement works.	Chapter 15 Material Assets (Section 15.1.1.4) of the EIAR.
10	Donegal County Council – Planning Section	Response received on 20/11/2025 No Response received on follow up.	Comments on risk management measures for drainage and Land, Soils and Geology and Hydrology and Hydrogeology chapters.	Chapter 4 Description of the Prospective Development (Section 4.5) of the EIAR, Chapter 8 Land, Soils and Geology of the EIAR, and Chapter 9 Hydrology and Hydrogeology of the EIAR. Chapter 4 Description of the Existing Development (Section 4.5) of the rEIAR, Chapter 8 Land, Soils and Geology of the rEIAR and, Chapter 9 Hydrology and Hydrogeology of the rEIAR.

No.	Consultee	Response received	Response Summary	Addressed in
11	EirGrid	No Response received on initial Scoping letter. Response received on 25/03/2026	EirGrid has developed an Engagement Protocol for underground cable (UGC) works within public roads. While this Protocol is intended primarily for EirGrid-led projects, it may be referenced by the Roads Sector and the relevant County Council during consultation. A link to the Protocol has been provided. EirGrid also noted its Powering Up the North West programme, which includes the Clogher–Srananagh project.	Chapter 15 Material Assets (Section 15.3.5) of the EIAR Chapter 15 Material Assets (Section 15.3.5) of the rEIAR
12	ESB Networks	No Response received on initial Scoping letter. Response received on 10/04/2026	ESB Networks asked for confirmation that an application has been submitted and noted that they can follow up once an application is received.	N/A
13	Faite Ireland	Response received on 21/10/2025. No response on follow up.	Issued EIAR Guidelines for the Consideration of Tourism and Related Projects	Chapter 5 Population and Human Health (Section 5.3.1) of the EIAR. Chapter 5 Population and Human Health (Section 5.3.2, Section 5.4.2.1.5, and Section 5.4.3.1.) of the rEIAR.
14	Geological Survey of Ireland (GSI)	Initial response received on 19/09/2025	Encourages the use of and reference to GSI datasets which are attached to the response. Also notes that records show one County Geological Sites (CGSs).	Chapter 8 Land, Soils and Geology (Section 8.1.3) of the EIAR. Chapter 9 Hydrology and Hydrogeology (Section 9.3.9) and Chapter 16 Vulnerability to Natural Disasters (as set out in Chapter 8 & 9 and Appendix 8-4) of the EIAR.

No.	Consultee	Response received	Response Summary	Addressed in
		Follow up response received on 30/03/2026	No further comments in the follow up response.	Chapter 8 Land, Soils and Geology (Section 8.5.2.7), Chapter 9 Hydrology and Hydrogeology (Section 9.3.9) and Chapter 16 Vulnerability to Natural Disasters (as set out in Chapter 8 & 9 and Appendix 8-4) of the rEIAR.
15	Health Service Executive	Initial response received on 03/10/2025 Follow up response received on 10/04/2026	Scoping response provided was organised under the following headers: > Public Consultation > Decommissioning > Siting, Location & details of Turbines > Assessment of Consideration of Alternatives > Noise and Vibration > Shadow Flicker > Construction and Environmental Plan > Surface and Ground Water Quality > Geotechnical and Peat Stability Assessment > Ancillary Facilities > Cumulative Impacts A full description of points raised by Health Service Executive can be found in Appendix 2-2 Scoping Responses.	EIAR: Chapter 1 Introduction Chapter 2 Background (Section 2.9.3) Chapter 3 Reasonable Alternatives Chapter 4 Description (Section 4.2) Chapter 5 Population and Human Health Chapter 8 Geology and Soils (Sections 8.3.8 and 8.5.2.9) Chapter 9 Hydrology & Hydrogeology (Section 9.5.2.1.2) Chapter 12 Noise and Vibration rEIAR: Chapter 1 Introduction Chapter 2 Background (Section 2.8) Chapter 3 Reasonable Alternatives (throughout Chapter 3) Chapter 4 Description (Section 4.2) Chapter 5 Population and Human Health (throughout Chapter 5 as set out in Table 5-1) Chapter 8 Land, Soils and Geology (Sections 8.3.8 and 8.5.2.8) Chapter 9 Hydrology & Hydrogeology (Section 9.3.13, Section 9.5.2.15 and Section 9.5.2.18) Chapter 12 Noise and Vibration (throughout Chapter 12)

No.	Consultee	Response received	Response Summary	Addressed in
				Appendix 4-3 Construction and Environmental Management Plan
16	Irish Aviation Authority (IAA)	Response received on 26/11/2025	IAA has not identified any specific requirements for inclusion at the scoping stage. However, it is anticipated that the following general requirements may be included as conditions in the event that planning permission is granted: ➤ The applicant shall liaise with the IAA to agree an appropriate aeronautical obstacle warning lighting scheme for the proposed wind farm development. ➤ The applicant shall provide, upon completion of construction, as-built coordinates in WGS84 format, together with ground levels and maximum blade tip elevations for each wind turbine location. The applicant shall notify the IAA of the intention to commence crane operations, providing a minimum of 30 days' advance notice prior to crane erection.	Chapter 15 Material Assets (Section 15.2.4.3) of the EIAR. Chapter 15 Material Assets (Section 15. 2.2 of the rEIAR.
17	Inland Fisheries Ireland	Initial response received on 24/10/2025	The Department provided observations on the Grid Connection in relation to water quality, valuable ecological habitats, aquatic	Chapter 6 Biodiversity (Section 6.4.1) of the EIAR and Chapter 9 Hydrology and Hydrogeology (Sections 9.5.2) of the EIAR

No.	Consultee	Response received	Response Summary	Addressed in
		Follow up response received on 10/04/2026	environment, watercourses, watercourse crossings, drains, and site transport routes. A full description of comments raised by Inland Fisheries Ireland can be found in Appendix 2-1 Scoping Responses. No further comments in follow up response.	Chapter 6 Biodiversity (Section 6.4.1) of the rEIAR and Chapter 9 Hydrology and Hydrogeology (Sections 9.5.2.11, Section 9.5.2.12 and Section 9.5.2.17) of the rEIAR
18	Irish Peatland Conservation Council (IPCC)	Response received on 17/09/2025. No response on follow up.	IPCC raised various concerns in relation to Meenbog Wind Farm.	EIAR: Chapter 6 Biodiversity Chapter 8 Land, Soils and Geology Chapter 9 Hydrology and Hydrogeology Chapter 11 Climate rEIAR: Chapter 6 Biodiversity Chapter 8 Land, Soils and Geology Chapter 9 Hydrology and Hydrogeology Chapter 11 Climate
19	Loughs Agency	Meeting held on 16 th January 2026	The Loughs Agency were contacted directly during the scoping exercise for the Subject Development, and a meeting was held in January 2026. The main points discussed were as follows: The findings of the aquatic surveys undertaken by the applicant were presented and it was noted that the findings aligned well with the findings of the Lough Agency's surveys and monitoring of the river.	EIAR: Chapter 6 Biodiversity rEIAR: Chapter 6 Biodiversity

No.	Consultee	Response received	Response Summary	Addressed in
			It was noted by the Loughs Agency that salmon had been recorded spawning throughout the catchment in good numbers in the years since the peat slide. It was also noted that salmon had been recorded in the Bunadaowen during electro-fishing surveys It was noted that the Loughs Agency had undertaken gravel cleaning throughout the spawning habitat within the Mourne Beg and had seen the benefit of this with an increase in the distribution of salmonid spawning following these interventions. It was noted that this is standard practice for the Loughs Agency, but additional works had been undertaken on the Mourne Beg following the peat slide He noted that distribution had contracted again to some degree and suggested that gravel cleaning may be needed again. The Loughs Agency noted that due to salmon lifecycle, the effects of an impact in 2020 would be seen again four years later when the fish from that time return to spawn. If there was a drop in salmon recruitment in 2020, there would likely be an equivalent drop in spawning fish, four years later. The applicant noted that no drop in salmon numbers had been recorded during the surveys	

No.	Consultee	Response received	Response Summary	Addressed in
			undertaken immediately after the peat slide by Loughs Agency and Triturus and that, there was no drop in numbers during the 2024 or 2025 electro-fishing surveys carried out by Triturus. Loughs Agency concluded that they did not disagree with the information presented to him during the meeting and agreed to further consultation if necessary.	
20	NIE Networks	No response on initial Scoping letter. Acknowledgement email received on 03/04/2026	NIE Networks only deal strictly with Northern Ireland so we are unable to provide assistance with this.	N/A
21	National Parks and Wildlife Service (NPWS)	Meeting held on 8 th January 2026.	In addition to the response outlined above in relation to the Department of Housing, Local Government and Heritage (DHLGH), the NPWS were contacted directly during the scoping exercise undertaken for the Subject Development and a meeting was requested, which took place in January 2026. The main points discussed during this meeting were as follows: Bog Restoration It was noted that the preferred methodology for bog restoration is tree stump removal/flipping in	EIAR: Informed the approach taken in Chapter 6 Biodiversity and the Biodiversity Management and Enhancement Plan in Appendix 6-4 of the EIAR, Chapter 7 Birds rEIAR: Informed the approach taken in Chapter 6 Biodiversity, Chapter 7 Birds

No.	Consultee	Response received	Response Summary	Addressed in
			flatter areas of deeper peat, and stump grinding/ pairing preferred on shallow sloped peat (Sourcing the necessary equipment for this may prove challenging). Reprofilling the bog surface in line with NatureScot Guidance can assist in reducing establishment of birch and similar dominant species. Drain blocking alone is unlikely to have the desired effect above a certain gradient. Aquatic Impacts The impact of the November 2020 Peat Slide on the downstream watercourses was discussed and the nature of the impacts and recovery of the river was explained. The emergency response measures undertaken by the applicant and stream restoration undertaken was also discussed. These actions limited impacts on the river and aided the recovery of the Shruhanganarve River. Appropriate Assessment The approach proposed in respect of the Appropriate Assessment reporting (AASR and NIS) was discussed and informed the nature of the assessment of effects on European Sites that is presented in the NIS that accompanies the application.	

No.	Consultee	Response received	Response Summary	Addressed in
			Hen Harrier The proposed BMEP Site was considered an appropriate habitat enhancement measure, with forestry felling welcomed as a means of improving habitat for hen harrier. It was recommended that simple monitoring indicators be established to assess the site's ongoing suitability and that the application clearly justify the selection of the site. The assessment of impacts should consider the loss of hen harrier nesting and foraging habitat, drawing on the NPWS High-Likelihood Nesting Area dataset, and should focus on the local Blue Stack Mountains hen harrier population rather than solely the national population.	
22	Royal Society for the Protection of Birds	Initial response received on 08/09/2025 Follow up response received on 31/03/2026	Due to limited capacity and high workload, they refer back to responses submitted in relation to the original application in 2017 (Application Reference No.: LA11/2016/1055/TBA) and 2018 (Application Reference No.: LA11/2017/1134/TBA) with paying particular attention to comments relating to peat. No further comments in follow up response.	Chapter 6 Biodiversity of the EIAR and Chapter 7 Ornithology of the EIAR Chapter 6 Biodiversity of the rEIAR and Chapter 7 Ornithology of the rEIAR
23	Transport Infrastructure Ireland (TII)	Initial response received on 17/09/2025	TII advised their recommendations and general guidance for the preparation of an EIAR, which may affect the national road network. This	Chapter 15 Material Assets (throughout chapter) the EIAR

No.	Consultee	Response received	Response Summary	Addressed in
		Follow up response received on 31/03/2026	includes concern for potential impacts any project would have on the national road network. TII also noted concerns regarding site access. No further comments in follow up response.	Chapter 15 Material Assets (throughout chapter) of the rEIAR.
24	Uisce Éireann	Response received on 24/10/2025	Uisce Éireann provided observations regarding existing network assets within the local area. Several aspects of water services to be considered include the following: ➤ Impacts of drinking water sources, ➤ Backfilling and waste sampling strategy, ➤ Mitigation measures for any potential negative impacts on water sources, ➤ Upgrades to water services infrastructure, ➤ Surface water management.	Chapter 5 Population and Human Health throughout the chapter of the EIAR, Chapter 9 Hydrology and Hydrogeology (Section 9.3.7, 9.5.2) and Chapter 15 Material Assets (Section 15.3.6) of the EIAR. Chapter 5 Population and Human Health throughout the chapter of the rEIAR, Chapter 9 Hydrology and Hydrogeology (Section 9.5.2.15) and Chapter 15 Material Assets (Section 15.3.4.2, Section 15.3.4.3) of the rEIAR.
25	Northern Ireland Water	No response to initial Scoping letter. Follow up response received on 01/04/2026	As this application is not based on a location within Northern Ireland, Northern Ireland Water would not be able to give advice regarding planning applications which would be the responsibility of third-party utility providers.	N/A

No.	Consultee	Response received	Response Summary	Addressed in
26	Waterways Ireland	Initial response received 8th September 2025. Follow up response received 2nd April 2026	Stated that Waterways Ireland has no remit within Donegal and as such will not be participating.	N/A

Table 2-8 Telecommunications Consultee responses and relevant chapters

Telecommunications and Aviation Scoping				
No.	Consultee	Date of Response	Response Summary	Addressed in
1	2RN	27 th May 2025	Stated that 2RN have one link nearby, requests the Fresnel zone be kept clear. Requests a protocol be signed.	Appendix 15-4 and Section 15.2 of Chapter 15 Material Assets of the EIAR.
2	Airwave	22 nd July 2025	Stated that there will be no impact.	N/A
3	AP Wireless	6 th June 2025	Stated to contact 3 Ireland, Vodafone Ireland and EIR.	N/A
4	BAI	27 th May 2025	Stated that they do not perform in-depth analysis of wind turbines or substations.	N/A
5	BT Networks	22 nd July 2025	Stated they no longer have microwave link network	N/A
6	Cellenex	27 th May 2025	Stated that there will be no impact.	N/A

7	Comisiún na Meán	27 th May 2025	Stated that there will be no impact.	N/A
8	ComReg	22 nd July 2025	Attached a list of relevant consultees	N/A
9	Department of Defence	25 th July 2025	Provided observations on tall structures.	Section 15.2 of Chapter 15 Material Assets of the EIAR
10	Defence Forces	29 th May 2025	Stated that they will revert in due course. No further response has been received to date.	N/A
11	Donegal County Council	23 rd July 2025	Stated they have a transmission link in the area, however advised that it will be retired in August of 2025.	N/A
12	EIR	29 th May 2025	Stated that there are two transmissions links within the proposed area.	Section 15.2 of Chapter 15 Material Assets of the EIAR
13	Enet	27 th May 2025	Stated that there are two links passing through the area that will need to be buffered correctly.	EIAR Chapter 15 Material Assets of the EIAR
14	Hibernian Towers	6 th June 2025	Stated that there will be no impact.	N/A
15	Irish Aviation Authority	26 th November 2025	Provided detail on potential planning conditions should planning permission be granted	Section 15.2 of Chapter 15 Material Assets of the EIAR
16	Imagine Network Services Ltd	27 th May 2025	Stated that there will be no impact.	N/A
17	IMS Connect	27 th May 2025	Stated that there will be no impact.	N/A

18	Irish Rail	22 nd July 2025	All requests should be sent to CIE.	N/A
19	Ivertec	27 th May 2025	Stated that there will be no impact.	N/A
20	Murray Group	27 th May 2025	Stated that there will be no impact.	N/A
21	NBI	28 th May 2025	Stated that there will be no impact.	N/A
22	Tetra Ireland	9 th September 2025	Stated there will be no impact	N/A
23	Three Ireland	27 th May 2025	Stated that there will be no impact.	N/A
24	Towercom	6 th June 2025	Stated that there will be no impact.	N/A
25	Uisce Éireann	6 th June 2025	Stated that there will be no impact. Provided shapefiles of Uisce Éireann infrastructure within the vicinity of the Site.	N/A
26	Virgin Media Ireland Ltd	27 th May 2025	Stated that there will be no impact.	N/A
27	Vodafone Ireland Ltd	28 th May 2025	Stated that they have one link passing through the area. A clearance of 30m from the first Fresnel zone is required.	Section 15.2 of Chapter 15 Material Assets of the EIAR
28	Westnet	27 th May 2025	Stated they have no equipment or plans in this area	Section 15.2 of Chapter 15 Material Assets of the EIAR

2.9.3 Community Engagement

The Applicant has engaged with the local community with regards to the Subject Development. A Community Liaison Officer (CLO) remained available throughout the process to facilitate communication with the local community and respond to any queries in relation to the application.

A primary element of the Prospective Development from a community perspective is the revised amenity proposals, which had to be revised to satisfy designer and landowner requirements. Early engagement was held with the original community group to agree revised proposals that could work for all involved. Feedback arising from these interactions informed the revised amenity proposals which form part of the Prospective Development. The CLO also engaged with other interested groups in relation to the project, which resulted in a letter of support being issued by the Bluestack Ramblers Walking Club. The development of the revised amenity proposals represented an early and constructive step in strengthening community-focused aspects of the project and once it was established, the project website was developed as a mechanism for informing the wider public about the proposal.

In October 2025, a dedicated project website www.meenboginfo.com was established to provide accessible information in relation to the substitute consent application. The website includes details of the proposed application for substitute consent, project background including details about the design team, and contact information for the CLO to enable members of the public to seek further information or clarification. A public notice was published in the Donegal Democrat to inform the community about the proposal and directing interested parties to the project website and CLO contact details.

In November 2025, letters were sent to residents in the vicinity of the Wind Farm Site and the Grid Connection Site. These letters provided a brief summary about the proposed planning application and reminded people about the dedicated project website where more detailed information was available. The correspondence also included details of the Public Information Exhibition (PIE) of the 3rd December 2025. A public notice was also published in the Donegal Democrat in November 2025 to inform the wider public of the upcoming PIE.

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

The concept of directing benefits from wind farms to the local community is promoted by the National Economic and Social Council (NESC) and the Wind Energy Ireland (WEI) among others.

The Guidelines state that:

“While it is not a mandatory requirement, it is strongly recommended that developers of a wind energy project should engage in active consultation and dialogue with the local community at an early stage in the planning process, ideally prior to submitting a planning application”.

This was further addressed in the Preferred Draft Approach to Wind Energy Development in Ireland (June 2017) which stated the following with respect to planning applications for wind farms:

“Planning applications must contain a Community Report prepared by the applicant which will specify how the final proposal reflects community consultation. The Community Report must also outline steps taken to ensure that the Proposed Project will be of enduring economic benefit to the communities concerned”.

The Draft Revised Wind Energy Guidelines (Department of Housing, Planning and Local Government, 2019) (the draft Guidelines) has retained this position stating the following:

“In order to promote the observance of best practice, planning authorities should require applicants to prepare and submit a Community Report with their planning application and a condition on any subsequent planning permission should require developers to carry out the development in accordance with the approved Community Report”.

Appendix 2-3 outlines the consultation and community engagement initiatives undertaken by the applicant prior to the submission of the planning application. An important element of this report was to display how the Subject Development will provide an enduring economic benefit to the communities surrounding the Subject Development. As outlined in the above sections, and in Appendix 2-3, the Meenbog Wind Farm has already contributed to the local and regional economy through employment generation, construction activity, local expenditure, development contributions, and financial returns to participating landowners. Looking forward, the Subject Development will continue to deliver enduring economic benefits through ongoing operational activity, employment, local expenditure, commercial rates, further financial contributions, community benefit funding, and continued engagement with the surrounding communities over the lifetime of the development.

2.9.4 Other Consultations

2.9.4.1 Pre-Planning Meeting - First Meeting

Members of the team and the Applicant met with representatives from An Coimisiún Pleanála in an in-person meeting held at offices of the Coimisiún, 64 Marlborough Street, Dublin 1 on the 19th of February 2025. Those in attendance were:

- Mary MacMahon (ACP)
- Stephanie Farrington (ACP)
- Finbarr Quigley (ACP)
- Sorcha Skelly (ACP)
- Laura Grady Lawlor (ACP)
- Cathy Carleton (ACP)
- Dillon Corcoran (ACP)
- Colm Ryan (MKO)
- Sean Creedon (MKO)
- Thomas Blackwell (MKO)
- William O'Connor (Applicant Planree Ltd.)

Matters discussed included:

- Description of Development and relevant background – clarity regarding scope of application.
- Procedural Advice / Queries arising regarding any subsequent application for substitute consent:
 - ACP representative referenced Section 177E(2)(a)(b) of the Act.
 - Application to be in accordance with Article 22 of the Planning and Development Regulations, 2001 as amended.
 - Requirement to provide a robust rationale for exceptional circumstances.
 - Provide clear rationale for duration and lifetime of permission.
 - Clearly outline the difference between the existing and permitted development.
 - Address compliance with the Water Framework Directive.
 - Onus on applicant to provide evidence that the site is suitable for the nature of development proposed in light of previous peat failure on the site.
 - Cumulative impact should be comprehensively addressed in any future applications.
- AOB.

2.9.4.2 Pre-Planning Meeting - Second Meeting

Members of the project team and the Applicant met with representatives from An Coimisiún Pleanála in an in-person meeting held at the offices of the Coimisiún, 64 Marlborough Street, Dublin 1 on the 7th January 2026.

Those who were in attendance at this meeting are listed below –

- Mary MacMahon (ACP)
- Stephanie Farrington (ACP)
- Finbarr Quigley (ACP)
- Ronan Megannety (ACP)
- Colm Ryan (MKO)
- Sean Creedon (MKO)
- Thomas Blackwell (MKO)
- William O'Connor (Applicant Planree Ltd.)

Matters discussed included:

- The intent to submit an application for substitute consent under Section 177(E) of the Planning and Development Act, 2000, as amended, to regularise the planning status of Meenbog Windfarm and seek permission for completion of the development. ACP acknowledged applications under Section 177E of the Act are not subject to the provisions of RED III.
- The withdrawal of the substitute consent application (ABP Ref: 319466-24) for 25 no. deviations following the Section 160 Proceedings taken by Donegal County Council and subsequent High Court and Court of Appeal Decisions which concluded that the entirety of existing development on site is unauthorised.
- Provisions of S177K (J)(a-j) of the Act as it relates to 'Exceptional Circumstances' and the importances of demonstration of compliance with same.
- The peat failure and the need to provide evidence that the site is suitable for the nature of development proposed.
- The differences between the permitted development and the prospective development are to be presented in the planning report which will accompany the application.

2.9.5 Meeting with Donegal County Council

Members of the project team and the Applicant met with representatives from Donegal County Council via a MS Teams meeting on the 10th February 2026.

Those who were in attendance are listed below –

- Frank Sweeney (DCC)
- Eunan Quinn (DCC)
- Brian Keville (MKO)
- Thomas Blackwell (MKO)
- Evelina Sadauskaite (MKO)
- Sean McCarthy (MKO)
- Sean Creedon (MKO)
- William O'Connor (Applicant Planree Ltd)

Matters discussed included:

- Compliance with DCC policy WEP-1-A.
- DCC questioned if ACP will enforce transboundary process.

- Any potential negative impacts through the hydrological links to the River Foyle need to be examined in the planning application.
- DCC queried how the additional small-scale slippages are being addressed as part of the application and if further movement of those slippages has occurred.

2.9.6 Meeting with Loughs Agency

Members of the project team and the Applicant met with a representative from the Loughs Agency via a MS Teams meeting held on the 16th January 2026.

Those who were in attendance are listed below –

- Riain McLaughlin (Loughs Agency)
- Pat Roberts (MKO)
- Robert Kennedy (MKO)
- Matthew Kiernan (MKO)
- William O'Connor (Applicant Planree Ltd)

Matters discussed included:

- Introduction and overview of the Subject Development including an overview of the history of Meenbog Wind Farm;
- An overview of the surveys undertaken were provided including an overview of the four main aquatic reports from 2017, 2021, 2024, 2025 and the EPA monitoring;
- An overview was provided of the restoration to date of the Shruhanganarve following the peat slide;
- It was discussed that the findings were broadly consistent with the Loughs Agency surveys and monitoring, with salmon spawning recorded in good numbers across the catchment in recent years since the peat slide, including electro-fishing evidence from the Bunadaowen. However, 2026 redd counts have not yet been completed due to unsuitable conditions;
- Gravel cleaning in the Mourne Beg, including additional works after the peat slide, was reported to have improved salmonid spawning distribution. While beneficial, there are indications that spawning distribution has recently contracted again, and further gravel cleaning may be required;
- It was noted that any impact from the 2020 event would likely become visible around four years later when affected salmon return to spawn, although MKO reported that no decline in salmon numbers was observed in post-incident and 2024–2025 surveys and will verify this further;
- MKO requested access to Loughs Agency data via formal request, and the Loughs Agency concluded there is no disagreement with the information presented and is open to further consultation if needed.

2.10 Cumulative Impact Assessment

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

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

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

2.10.1

Methodology for the Cumulative Impact Assessment of Projects

To gather a comprehensive view of cumulative impacts on the above environmental considerations and to inform the EIAR process being undertaken by the consenting authority, each relevant chapter within this EIAR addresses the potential for cumulative effects to arise, where appropriate.

A cumulative project search has been carried out. The information was gathered through a search of relevant online Planning Registers, reviews of relevant EIAR (or historical EIS) documents, planning application details and planning drawings, and served to identify past and future projects, their activities and their environmental impacts. These projects are summarised in Appendix 2-1 of this EIAR.

In the first instance, an assessment of potential cumulative effects between the Prospective Development and other relevant plans and projects has been undertaken in Chapters 5 to 16 for the purposes of identifying what influence the Prospective Development has on the surrounding environment when considered cumulatively with relevant plans, projects and other land uses in the vicinity of the Site.

Following this, an assessment of the identified environmental effects of the Prospective Development, in cumulation with the anticipated environmental effects of the Existing Development, has been undertaken in each relevant chapter. This provides a summary of the environmental effects of the Subject Development.

Finally, an assessment of potential cumulative effects of the Subject Development with other relevant plans, projects and land uses has been carried out for the purpose of identifying what influence the Subject Development could potentially have, on the surrounding environment when considered cumulatively and in combination with relevant plans, projects and other land uses in the vicinity of the site. It should be noted that in certain chapters the order of the cumulative assessment may vary from the above sequence. Please refer to Figure 2-4 below, which outlines the assessment steps.



ASSESSMENT CHAPTER STRUCTURE - EIAR

INTRODUCTION

A description of the project comprising information on the site, design, size and other relevant features.

ASSESSMENT METHODOLOGY

A description of data and methods used, the reasons for their selection, the limitations and difficulties encountered.

RECEIVING ENVIRONMENT

A description of the relevant aspects of the current state of the environment (baseline scenario) involving the collection and analysis of information on the condition, sensitivity and significance of relevant environmental factors which are likely to be significantly affected by the project.

LIKELY SIGNIFICANT EFFECTS

A description of the likely significant effects of the project on the environment resulting from
1) Construction 2) Operation and
3) Decommissioning

TRANSBOUNDARY EFFECTS

Assessment of the potential for transboundary effects as a result of the Subject Development.

CUMULATION EFFECTS SUBJECT DEVELOPMENT

Assessment of cumulative effects of the Subject Development, any other relevant existing, permitted or proposed projects. Assessment of identified environmental effects of Prospective Development when considered cumulatively with other relevant plans, projects and other land uses .

IN-CUMULATION EFFECTS

This section considers the in-cumulation impact of the combination of the Prospective Development and Existing Development (the Subject Development).

CUMULATIVE EFFECTS - PROSPECTIVE DEVELOPMENT

Assessment of cumulative effects of the Prospective Development, any other relevant existing, permitted or proposed projects. Assessment of identified environmental effects of Prospective Development when considered cumulatively with other relevant plans, projects and other land uses .

2.10.2

Cumulative Study Area

Table 2-9 below details the cumulative assessment study areas, relative to the Prospective Development, which are considered in this EIAR. Following consultation with the EIAR team on each individual topic, the maximum geographical extent where there is potential for cumulative impact, and justification for this extent was established and is presented below.

Table 2-9 Cumulative Assessment Study Areas and Justification – Prospective Development

Individual Topic	Maximum Effect	Justification
Population & Human Health	Population Study Area Shadow Flicker Study Area (10xRD buffer from proposed turbines, 1.55km) Consideration for the Population & Human Health cumulative extent is also given to the Air & Climate, Noise, Water and Landscape & Visual (i.e Residential Visual Amenity) Cumulative Study areas	The Study Area for Population is identified in Section 5.3.1 in Chapter 5 as the District Electoral Divisions within which the Prospective Development is located. For the assessment of cumulative shadow flicker, any other existing, permitted or proposed wind farms are considered where their ten times rotor diameter shadow flicker study area are located within the Shadow Flicker Study Area of max 1.55km (ten times the rotor diameter from proposed turbines) for the Prospective Development. There are 4 no. existing, permitted, or proposed wind farms within 5km of the proposed turbines. The permitted Barnesmore Windfarm Repowering is located approximately 2km southwest of the Prospective Development and consists of the decommissioning of 25 no 61m tip height turbines and repowering of the site with up to 13 no. turbines of a maximum tip height of 180m and maximum rotor diameter of 158m. The proposed Meenakeeran Wind Farm is located approximately 3km east of the Wind Farm Site, consisting of 5 no. turbines with a maximum tip height of 150m and maximum rotor diameter of 132m. The existing Straness Wind Farm, consisting of 21 no turbines with a tip height of 115m and rotor diameter of 90m, is located approximately 3.5km southwest of the Prospective Development. The potential for cumulative shadow flicker impacts has been assessed.
Biodiversity (Bats)	10km from the Wind Farm Site. Consideration for the Biodiversity cumulative extent is also given to the Birds and Water Cumulative geographical boundaries.	Using the precautionary approach and given the nature and scale of the Prospective Development, the geographical boundary for terrestrial ecological aspects, i.e. habitats, is 10 km for cumulative assessment for the Prospective Development.

Biodiversity & Birds	Terrestrial Biodiversity The cumulative study area includes: Cumulative effects assessment considered projects located within approximately 1.5 km of the Mourne Beg, Lowerymore, and Glendergan River sub-basins. The assessment area extended downstream to Lough Eske (Lowerymore catchment) and the River Derg (Glendergan and Mourne Beg catchments). Birds 25km buffer from proposed turbines for large infrastructural development, such as wind farms, energy. Additionally, a regional landscape buffer around areas of connected upland habitat above 100m.	Using the precautionary approach and given the nature and scale of the Prospective Development, the geographical boundary for terrestrial ecological aspects, i.e. habitats, there was a potential for cumulative effects in hydrological environments downstream of the development. The existing site drainage and extent of catchments in the vicinity of the site defined this cumulative study area. NatureScot guidance ‘<i>Assessing the Cumulative Impacts of onshore Wind Energy Developments</i>’ (SNH, 2012; 2018) was consulted while undertaking the cumulative assessment. SNH (2012; 2018) emphasises that its priority is to ‘<i>maintain the conservation status of the species population at the national level.</i>’ However, it is acknowledged that consideration should also be allowed for impacts at the regional level ‘<i>where regional impacts have national implications (for example where a specific region holds the majority of the national population)</i>’. Following the guidance of SNH (2012), the cumulative impact assessment has been carried out at the scale of the importance rating of the receptor. A 25km radius of the Prospective Development turbines was considered a reasonable approximation of the size of a county and a 5km radius of the proposed turbines was considered a reasonable approximation for the local level. In addition to this, a regional landscape buffer was created around areas of connected upland habitat above 100m, which represents a continuous area of habitat connectivity for birds.
Land, Soils and Geology	The Site	As there is no pathway for offsite cumulative impacts for Land, Soils and Geology, the cumulative study area is the Site.
Hydrology & Hydrogeology	The cumulative hydrological study area includes: The catchment of the Mourne Beg River downstream as far as its confluence with the River Derg; The catchment of the Glendergan River downstream	The Hydrology and Hydrogeology assessment concludes that the main likelihood of cumulative effects during the construction phase is considered to relate to the hydrological environment (surface water) rather than the hydrogeological (groundwater) environment. As such, the cumulative study area was chosen to reflect the site drainage extent in the existing environment, further outlined in Chapter 9 of this EIAR.

	as far as its confluence with the River Derg; and, The Lowerymore River downstream as far as Lough Eske.	
Air Quality	Air Quality Study Area is 250m from the Wind Farm Site.	In line with the Air Quality Management in the UK (IAQM) guidance document ‘ <i>Guidance on the Assessment of Dust from Demolition and Construction</i> ’ (2024), a distance of 250m is used for dust soiling and PM ₁₀ emissions from construction activities, earthworks and trackout to assess impacts on humans and sensitive ecological receptors.
Climate	Ireland	The Climate assessment has considered the cumulative effects of the Prospective Development with other developments on a national basis and within the context of the national Carbon Budget and relevant sectoral emissions ceiling.
Noise and Vibration	Existing, permitted and proposed wind farm developments with the potential for cumulative impacts have been considered as part of the turbine noise impact assessment.	The geographical boundary for the cumulative noise assessment is the area within which noise levels from the proposed, consented and existing wind turbine(s) may exceed 35 dB LA90 at up to 10m/s wind speed (Institute of Acoustics document Good Practice Guide To The Application Of Etsu-R-97 For The Assessment and Rating of Wind Turbine Noise). Existing, permitted and proposed wind farm developments with the potential for cumulative impacts have been considered as part of the turbine noise impact assessment. The cumulative turbine noise from the Barnesmore Repowering Wind Farm, Meenakeeran Wind Farm and the Straness Wind Farm have been included in the operational turbine noise assessment. No other wind farms have the potential to contribute to cumulative noise levels.
Cultural Heritage	20km buffer from the Wind Farm Site	The study area reflects the 5km study area assessed for the Prospective Development, in terms of sites subject to statutory protection. Given that any archaeological remains identified within the footprint of the Prospective Development will be preserved in-situ or by record, no negative cumulative construction effects have been identified.

Landscape & Visual	20km from Prospective Development turbine locations for visual and landscape effects. 15km from Prospective Development turbine locations for effects on landscape character.	The LVIA Study Area was chosen as 20km for landscape and visual effects as is suggested by guidance: <i>‘For blade tips in excess of 100m, a Zone of Theoretical Visibility radius of 20km would be adequate’</i> (WEDGs Page 94, DoEHLG, 2006; Page 152, DoHPLG, 2019) Through experience conducting LVIA for other wind energy development projects, the assessment team determined that no significant effects on landscape character are likely to arise beyond distances of 15km from the proposed turbines. Therefore, a LCA Study Area of 15km is deemed appropriate for effects on landscape character in relation to the assessment of effects upon designated Landscape Character Areas.
Material Assets: Traffic & Transport	25km from the Wind Farm Site	Informed by traffic modelling scenario and the area of influence the Prospective Development has on changing traffic volumes. The potential cumulative traffic effects with the Prospective Development are assessed on the following criteria; ➤ Project status (proposed to operational) ➤ Degree of overlap with the Prospective Development delivery highway network (low to high) ➤ Traffic volumes (low to high) The geographical boundary for the traffic & transport cumulative assessment is defined by the potential for other projects to overlap with the Prospective Development delivery highway network, and so a 25km buffer from the proposed turbines is deemed appropriate to capture other plans and projects with the potential for cumulative effects with the Prospective Development. Please refer to Chapter 15 Material Assets for further details on the cumulative assessment methodology.
Material Assets: Telecoms, Aviation and Other Utilities	The list of wind farms and other projects which were initially considered in cumulative assessment extended to 25km.	The geographical boundary for the telecoms cumulative assessment is defined by the potential for other wind farm projects to interfere with broadcast signals that interact with the Prospective Development.

To gather a comprehensive view of cumulative impacts within the cumulative study area for the Prospective Development and to inform the EIA process being undertaken by the consenting authority, each relevant chapter within the EIAR addresses the potential for cumulative effects where appropriate and within the context of their identified cumulative study area. A list of projects considered (i.e. the largest cumulative study boundary of catchments) across all disciplines in their cumulative impact assessment is included in Appendix 2-1 of this EIAR.

The wind farms listed in Table 2-5 of this chapter are also included in the list of projects considered in Appendix 2-1. The cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider the following:

November 2020 Peat Slide Remediation Works

The Existing Development is considered cumulatively with the environmental remediation works which occurred as a response to the November 2020 Peat Slide. Details of the November 2020 Peat Slide and associated remediation efforts are provided in Appendix 2-3 of the rEIAR.

Other Developments/Land uses

As discussed above, the review of the relevant County Council planning registers documented relevant general development planning applications in the vicinity of the Prospective Development (Appendix 2-1), the majority of which relate to the provision and/or alteration of one-off rural housing or are agricultural in nature. These applications have also been taken account in describing the baseline environment and in the relevant assessments.

Furthermore, the cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider potential significant cumulative effects arising from land uses in the vicinity of the Prospective Development. Land use on the site, was and is currently limited to commercial forestry plantations and pastoral agriculture.

Cumulative Effects – Subject Development

The cumulative assessment of the Subject Development considers both the maximum extent of the study areas and justification outlined in Table 2-8 and Appendix 2-1 of the rEIAR for the Existing Development and the maximum extent of the study areas and justification outlined in Table 2-9 and Appendix 2-1 of this EIAR for the Prospective Development.

6.1.2

Summary

The cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider all potential significant cumulative effects arising from relevant projects, plans and land uses within the cumulative study area and within the vicinity of the Prospective Development. Assessment material for this cumulative impact assessment was compiled on the relevant project and/or plans within the defined cumulative assessment study areas. The material was gathered through a search of relevant online Planning Registers, reviews of relevant EIAR (or historical EIS) documents, planning application details and planning drawings, and served to identify past and future projects, their activities and their environmental impacts. These include ongoing agricultural or forestry practices. Each relevant chapter within the EIAR addresses the potential for cumulative effects where appropriate and within the context of their identified cumulative study area. A long list of all applications considered by each of the different disciplines in their cumulative impact assessment are included in Appendix 2-1.

Overall, the Prospective Development has been designed to avoid and mitigate impacts on the environment, and a suite of mitigation measures is set out within the EIAR. The mitigation measures set out in this EIAR will ensure that significant cumulative effects do not arise during the construction,

operational or decommissioning phases of the Subject Development. Additional detail in relation to the potential significant cumulative effects arising and, where appropriate, the specific suite of relevant mitigation measures proposed are set out within each of the relevant chapters of this EIAR.