

2.

BACKGROUND TO THE EXISTING DEVELOPMENT

This chapter of the Remedial Environmental Impact Assessment Report ('rEiAR') 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 Existing Development) and should be read in conjunction with the Planning Report which accompanies the planning application. This chapter also sets out relevant planning history, summarises EIA scoping and consultations undertaken, and the cumulative impact assessment process.

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 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.

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-1985 Local Road and finally following a private road to reach the Clogher 110kV substation.

Approximately 90% of the civil engineering works, including wind farm access roads, 110kV electrical substation, Grid Connection, turbine hardstands, turbine foundations, and ancillary works are substantially completed. The on-site substation and associated Grid Connection is fully constructed and energised. The principle of wind energy development at the Wind Farm Site has therefore been established.

Substitute consent will be sought for Existing **Development**. This includes, *inter alia*:

- Upgrading of access junctions, tracks and roads, and construction of new site access roads;

- 18 no. wind turbine foundations and hardstand areas at various stages of development;
- A 110kV Electrical substation with 2 no. control buildings (with a combined floor area of 398.1 sqm) with welfare facilities, associated electrical plant and apparatus, security fencing and underground wastewater holding tank;
- 110kV underground grid connection cabling (including joint bays, communication chambers, earth sheath links, and ancillary works along the underground electrical cabling route) connecting the wind farm 110kV substation to the Clogher Substation in the townland of Cullionboy. This cabling route is primarily located within the public road corridor;
- Internal wind farm underground cabling at various stages of development;
- 2no. temporary construction compounds (including 4 no. temporary site offices with a combined floor area of 66 sqm and 1 no. temporary security cabin with a floor area of 30.5 sqm);
- 3no. borrow pits;
- Peat and spoil management;
- Forestry felling;
- Site drainage and sediment control measures; and
- All associated site development 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 for 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 2.7 and of this Chapter and Appendix 2-1 of the rEIAR 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. 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. Policy support for the continued deployment of renewable energy developments continues to exist at all levels of the planning policy hierarchy.

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 Exiting 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.

2.3

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 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:

- 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.

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/department-of-climate-energy-and-the-environment/publications/national-energy-security-framework/>

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)

- 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, Ireland 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.

2.3.2 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. This transition to renewable energy 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 diminishes.

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.

2.3.3 National Climate Change Policy

Program 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 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 Ireland reaching its legally-binding net-Zero emissions by 2050, and to a 51% reduction in emissions by the end of this decade.

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 country’s future emissions targets may be missed, it is crucial that projects such as the Meenbog Wind Farm is supported. The Subject Development will facilitate the completion of the construction and commencement of operation of the Existing Development thereby contributing to increased renewable energy outputs, and consequently working towards meeting future emissions targets.

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 Exiting 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**.”*(MKO 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 Exiting 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 Exiting 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.

2.3.3.2 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 Exiting 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 rELAR 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) 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).

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)

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 renewable energy development, and therefore we respectfully ask that the application is expedited 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 fossil 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)¹³. 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:

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 sources¹⁴.*

REPower EU

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.*
1. *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.

¹³ <https://www.consilium.europa.eu/en/policies/eu-plan-for-a-green-transition/>

¹⁴ https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/energy-and-green-deal_en

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. 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 rELAR, and they provide further justification for granting consent for 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 Climate, Energy and the Environment) 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% RESE 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 Report¹⁵, 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.

¹⁵ <https://www.gov.ie/pdf/?file=https://assets.gov.ie/276441/eb496e01-5c01-4594-af09-74342b4ac971.pdf#page=null>

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.

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 2023, 24.5% of energy consumed in the EU came from renewable energy sources¹⁶. This represents an increase of 1.5% compared to 2022 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 15.3% in 2023¹⁷. 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 36.8% in 2022, but still below the EU average of 41.1%¹⁸.

¹⁶ https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Renewable_energy_statistics

¹⁷ https://ec.europa.eu/eurostat/databrowser/view/hrg_ind ren/default/table?lang=en

¹⁸ https://ec.europa.eu/eurostat/databrowser/view/hrg_ind ren custom_9264705/default/bar?lang=en

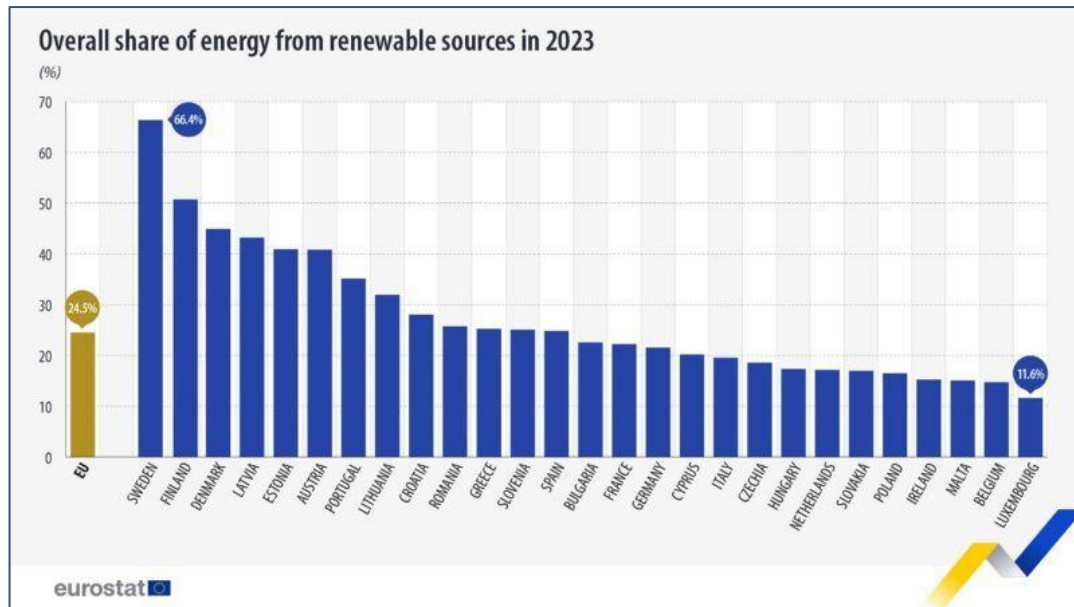


Figure 2-1 Overall share of energy from renewable sources (source: Eurostat)

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 2024–2053' 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 it's 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 WEM and WAM scenarios and the legally binding national and EU emission reductions targets. The Report states that even with full implementation of CAP24, Ireland is projected to miss its agreed national and EU 2030 targets for energy efficiency, renewable energy share and greenhouse gas emissions reduction.

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 were 6.9MtCO₂eq 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.

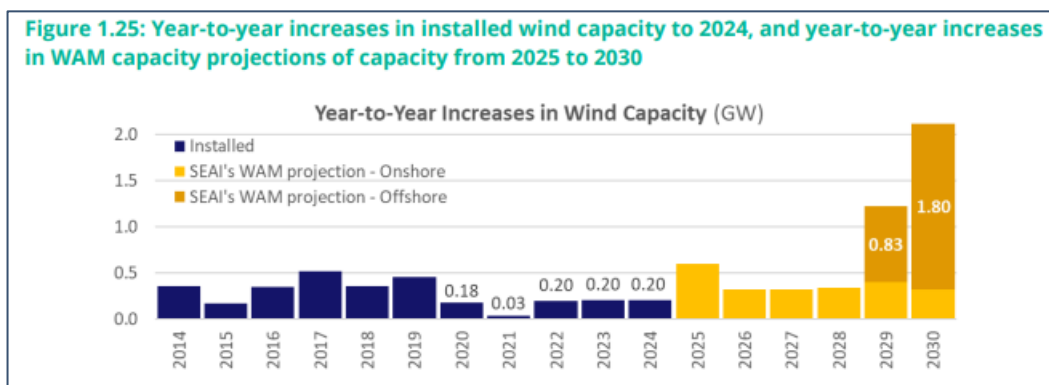


Figure 2- 2 Ireland's year-to-year increases in installed wind capacity required to align the pace of the WAM

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,

"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 Planning Policy Context

2.6.1 Introduction

This section of the rELAR provides the strategic planning context of 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 Policy Context

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 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 Planning & Development Act 2000 as amended, as is currently 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 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 Exiting 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 housing, health, population growth, and most relevant to the Subject Development, climate change. It is stated that the NDP 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 greenhouse gas 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. Subject Development, 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 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 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 Policy Context

Northern and Western Regional Spatial and Economic Strategy 2020 – 2032

The Northern and Western Regional Assembly (NWRA) was established in 2020 and the Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region (Galway, Mayo, Roscommon, Sligo, Leitrim, Donegal, Cavan and Monaghan) came into effect in January 2020. The RSES provides a long-term, strategic development framework for the future physical, economic and social development of the Northern and Western 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 Northern 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 Subject 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 Subject Development. It is considered

that the provision of the Subject Development would facilitate this objective and is particularly in line with RPO 4.16, 4.17 and 4.18.

In the Region, a noticeable trend has emerged to recognise and take advantages of emerging opportunities related to the shift towards a decarbonised 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 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 objective **WE-P-1A** as outlined below and discussed in Table 2-2 below.

"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-P3** 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-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-P5** is relevant to the Subject Development, having the aim “*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-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 below. However, the development is currently under construction, as indicated by the highlighted text under ‘**Development Under Construction**’ (refer to Table 2-3 above).

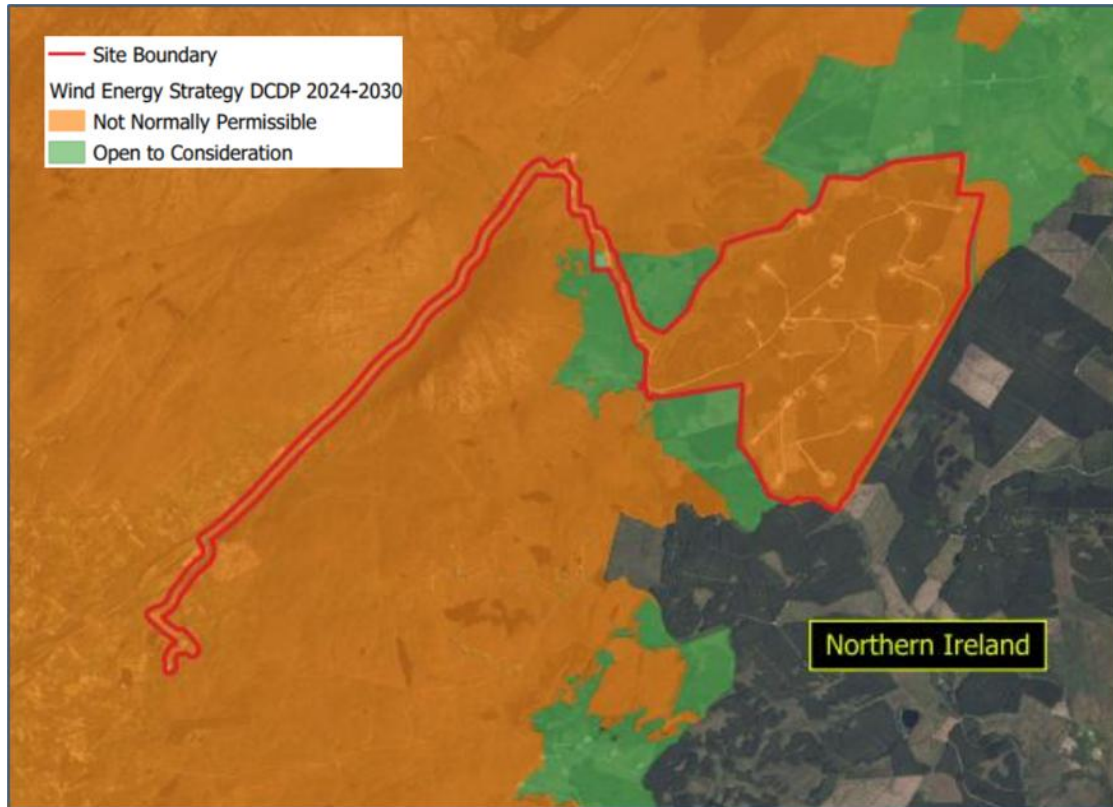


Figure 2-3 DCDP 2024-2030 Wind Energy Designation Areas map (MKO emphasis included in red)

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 2024 to 2029 (LACAP) 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 LACAP 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 (WECAs), 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 rELAR, rNIS, ELAR 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 Planning History

2.7.1 Planning History of the Site

This section of the rEIAR 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 ACP(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 Meenbog Wind Farm, 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 Cashelnaveneen 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 remains within the consented design envelope and parameters (i.e. tip-height of 156.5m, with no alteration to permitted layout).

Construction work commenced 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 Consulting on their behalf), nothing has emerged to indicate that any deviation from the 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 as part 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.

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 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 wind farm as constructed to date, the Existing Development, and to seek permission to finish the wind farm i.e. the Prospective Development together the Subject Development.

2.7.2

Planning Applications within the Red Line Boundary

This section of the rEIAR 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 application Site boundary.

Table 2-4 Planning Applications within the Red Line 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 Scoping and Consultation

2.8.1 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 rEIAR and EIAR and the specific standards of information they require. Comprehensive and timely scoping helps ensure that the rEIAR and EIAR 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 rEIAR and EIAR, 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 rEIAR and EIAR. Consultees were invited to contribute to the rEIAR and EIAR 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 rEIAR and EIAR. All scoping responses from

relevant personnel/bodies in their respective capacities as consultees are listed below and the relevant responses included as Appendix 2-2 of this rEIAR and Appendix 2-2 of the EIAR.

2.8.2 Scoping Responses

Table 2-6 lists the responses received to the scoping document circulated. Copies of all scoping responses received as of June 2026 are included in Appendix 2-2 of this rEIAR. The recommendations of the consultees have informed the scope of the assessments undertaken and the contents of the rEIAR. 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 rEIAR and EIAR. Those bodies engaged with at scoping stage are set out below in Table 2-5.

Table 2-5 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 2-6 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 2-6: 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 2-2 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 rEAR.

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	Failte 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 (Northern Ireland)	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 Shruhangerve 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 (I 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 2–7 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 passings 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

2.8.3 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 of the EIAR for the Prospective Development 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 of the EIAR for the Prospective Development 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 of the EIAR for the Prospective Development, 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.

2.8.4 Other Consultations

2.8.4.1 Pre-Planning Meeting – First Meeting

Members of the project 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.

2.8.4.2 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.

2.8.5 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.

2.8.6 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 Shruhangerve 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.

2.9 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 rEIAR process being undertaken by the consenting authority, each relevant chapter within this rEIAR includes a cumulative impact assessment where appropriate.

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

2.9.1

Methodology for the Cumulative Impact Assessment of Projects

To gather a comprehensive view of cumulative impacts on the environmental considerations and to inform the EIA process being undertaken by the consenting authority, each relevant chapter within this rEIAR 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.

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

Following this, an assessment of the identified environmental effects of the Existing Development, in cumulation with the anticipated environmental effects of the Prospective 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.

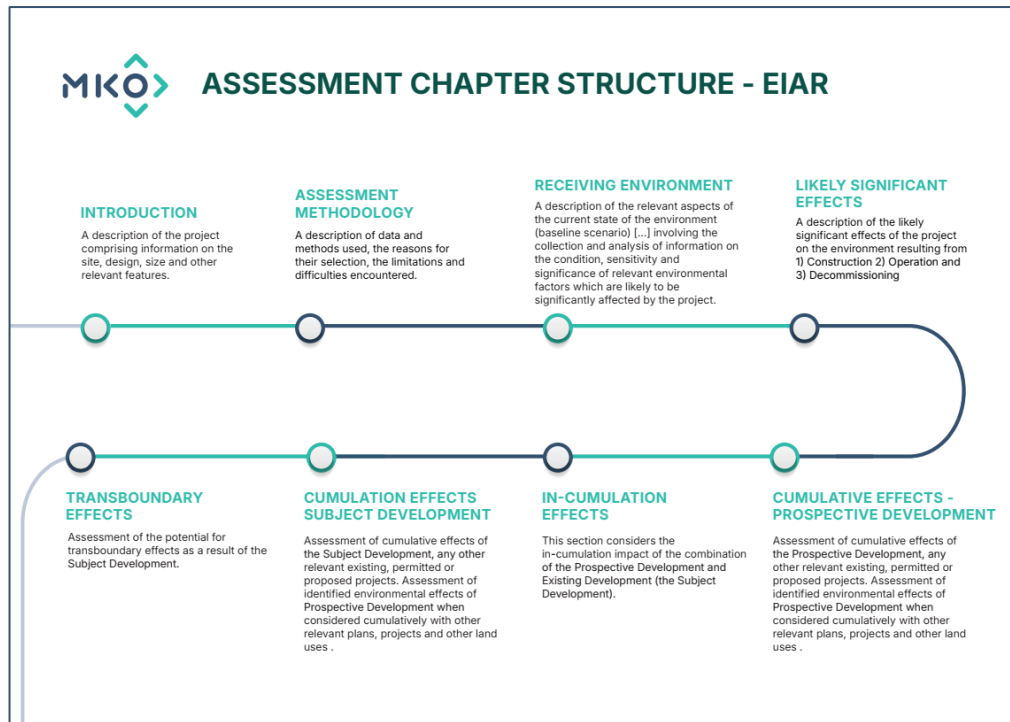


Figure 2- 4 Assessment Chapter Structure

2.9.2

Cumulative Study Area

Table 2-8 below details the cumulative assessment study areas, relative to the Existing Development, which are considered in this rEIAR. Following consultation with the rEIAR 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 2-8 Cumulative Study Areas and Justification – Existing Development

Individual Topic	Maximum Extent	Justification
Population & Human Health	The cumulative Study Area for population and Human Health is defined as the District Electoral Division of Golland, in County Donegal. Consideration for the P&HH cumulative extent is also given to Air Quality, Climate, Noise, and Landscape and Visual (i.e., Residential Visual Amenities) Cumulative study areas.	The Study Area for Population is identified in Section 4.3.1 in Chapter 4 as the District Electoral Division where the Existing Development and Subject Development area located. This Area is considered in the cumulative assessment.
Biodiversity and Birds	The cumulative 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 as far as its confluence with the River Derg; and, The Lowerymore River downstream as far as Lough Eske.	Using the precautionary approach and given the nature and scale of the Existing 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.
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 Existing Development, the geographical boundary for terrestrial ecological aspects, i.e. habitats, is 10 km for cumulative assessment for the Existing Development.
Land, Soils and Geology	Wind Farm Site and Grid Connection Site	Due to the localised nature of the construction works, which were kept within the Wind Farm Site and Grid Connection Site, there was no potential for significant cumulative effects in combination with other local developments on the land, soils and geology environment.

Hydrology and 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 as far as its confluence with the River Derg; and, The Lowerymore River downstream as far as Lough Eske.	The HES assessment concludes that the main likelihood of cumulative effects during the construction phase is considered to have related 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.
Air and Climate	Air Quality Study Area is 250m from the Existing Development works areas The Climate assessment has been considered on a national basis and not confined to a specific study area.	In line with the Air Quality Management in the UK (IAQM) guidance document ‘Guidance on the Assessment of Dust from Demolition and Construction’ (2024), a distance of 250m is used for dust soiling and PM10 emissions from construction activities, earthworks and trackout to assess impacts on humans and sensitive ecological receptors. Climate assessment has considered the cumulative effects of the Existing Development and Subject Development with other developments on a national basis and within the context of the national Carbon Budget and relevant sectoral emissions ceiling.
Noise & Vibration	Wind Farm Site and Grid Connection Site.	Due to the localised nature of the of the construction works, which were kept within the Existing Development, there was no potential for significant cumulative effects in-combination with other local developments on noise and vibration.
Cultural Heritage	Cultural heritage Cumulative study area was defined based on the Cultural heritage assets involved. In general, following the precautionary principle, other relevant projects within 2km of the Wind Farm Site and Grid Connection Site have been considered in the first instance. UNESCO World Heritage Sites (including tentative sites) – 2km	Cumulative effects encompass the combined effects of multiple developments or activities on a range of receptors. In this case, the receptors are the archaeological monuments and architectural/cultural heritage sites in the vicinity of the Existing Development The distances below in the assessment of effects on setting are regarded as appropriate in terms of the deviations being assessed and are based on professional judgement.

	National Monuments (State Ownership and Preservation Order Sites) – 1km Sites and Monuments and Recorded Monuments, RPS, and NIAH structures -Within Site Boundary Undesignated sites, if relevant – 500m	The potential cumulative effects between and the Existing Development has been considered in terms of effects on cultural heritage.
Landscape & Visual	Wind Farm Site and Grid Connection Site and lands within 5km of the turbine hardstands.	Due to the localised nature of the Existing Development there will be no interaction between the Existing Development and other developments outside the Wind Farm Site and Grid Connection Site.
Material Assets: Traffic & Transport	The list of large-scale projects which were initially considered in cumulative assessment extended to 10 km from the Wind Farm Site and the Grid Connection Site.	The geographical boundary for the traffic & transport cumulative assessment is defined by the potential for other projects to overlap with the Existing Development delivery highway network, and so a 10km buffer from the Wind Farm Site is deemed appropriate to capture other plans and projects with the potential for cumulative effects with the Existing Development. Please refer to Chapter 15 Material Assets for further details on the cumulative assessment methodology.
Material Assets: Utilities	Wind Farm Site and Grid Connection Site	Due to the localised nature and extent of the Existing Development, any cumulative effects were restricted to the Wind Farm Site and Grid Connection Site.

To gather a comprehensive view of cumulative impacts within the cumulative study area for the Existing Development and to inform the rEIAR process being undertaken by the consenting authority, each relevant chapter within the rEIAR 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 rEIAR. The cumulative impact assessments carried out in each of the subsequent chapters of this rEIAR 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 this 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 Existing 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 rEIAR consider potential significant cumulative effects arising from land uses in the vicinity of the Existing 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 the EIAR for the Prospective Development.

12.1.2 Summary

The cumulative impact assessments carried out in each of the subsequent chapters of this rEIAR consider all potential significant cumulative effects arising from relevant projects and/or plans and land uses within the cumulative study area and within the vicinity of the Existing 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 rEIAR 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 Existing Development has been designed to mitigate impacts on the environment and particularly water, and a suite of mitigation measures is set out within the rEIAR. Additional detail in relation to the potential significant cumulative effects that may have arisen, will arise and, where appropriate, the specific suite of relevant mitigation measures is set out within each of the relevant chapters of this rEIAR.