

Environmental Impact Assessment Report (EIAR)

Proposed Slievegrine
Renewable Energy
Development, Co.
Waterford

Chapter 2- Background to the Proposed
Project



2. BACKGROUND TO THE PROPOSED PROJECT

2.1 Introduction

This chapter of the EIAR presents the relevant energy and climate change related policy and targets along with the strategic, regional, and local planning policies relevant to the Proposed Project. It also summarises the EIA scoping exercise, the pre-planning and community consultation undertaken, as well as the planning history and the cumulative impact assessment process undertaken in relation to the Proposed Project.

This chapter should be read in conjunction with the Planning Report which accompanies the planning application.

The Proposed Project, known as ‘Slievegrine Renewable Energy Development’ is being brought forward in response to local, regional, national and European policy regarding Ireland’s transition to a low-carbon economy, associated climate change policy objectives and to reduce Ireland’s dependence on imported fossil fuels for the production of electricity.

As detailed in Section 1.1.1 of Chapter 1: ‘*Introduction*’, of this EIAR the various project components are described and assessed using the following references: ‘Proposed Project’, ‘Proposed Wind Farm’, ‘Proposed Grid Connection’, ‘Proposed Turbines’, ‘Proposed 110kV Substation’, ‘Proposed 220kV Loop-in Substation’, ‘Proposed 110kV Underground Cabling Route’, ‘Site’, ‘Proposed Wind Farm Site’ and ‘Proposed Grid Connection site’. A detailed description of the Proposed Project is provided in Chapter 4: ‘*Description of the Proposed Project*’, of this EIAR.

As the anticipated installed capacity of the Proposed Project is c. 145.2MW (17 no. 6MW and 6 no. 7.2MW) and as this is above the Strategic Infrastructure Development (SID) threshold of 50MW, the application for the Proposed Project will be made to the An Coimisiún Pleanála (ACP) under Section 37E of the Planning and Development Act 2000 (as amended) (“the Act”). The Proposed Grid Connection includes the Proposed 110kV Underground Cabling Route from the Proposed 110kV Substation, in the townland of Clashbrack, Co. Waterford, to the Proposed 220kV Loop-in Substation in the townland of Ballycullane, Co. Waterford.

2.1.1 Statement of Authority

MKO has developed extensive expertise and experience over the last 20 years in preparing Background and Planning Policy Context Chapters for a range of projects, including multiple large scale wind energy development.

This chapter was led by Alan Clancy MIPI with support from Sean McCarthy and Adrian Moran. Alan Clancy is a Senior Planner at MKO, who has over 10 years of experience in private practice. Alan holds a BA in Geography & History and a Master’s in Planning and Sustainable Development. Alan has experience across a range of sectors including in the commercial, residential, industrial and renewables sectors, Alan’s key strengths and areas of expertise are in development management, provision of planning advice, and project management. Since joining MKO, Alan has assisted with various projects including Strategic Infrastructure Developments, lodgement and management of Planning Applications, Development Plan Submissions and preparing Development Potential Reports. Alan is a member of the Irish Planning Institute.

Sean McCarthy is a Project Director in the Planning Team 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 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.

Adrian Moran is a Planner with MKO, who has over 2 years of experience in private practice having joined the company in April 2024. Adrian holds a BA (Hons) in History and Archaeology from University of Galway and an MSc (Hons) in Planning and Development from University of Galway. Since joining MKO, Adrian has been involved in a range of renewable energy projects including onshore and offshore wind, solar and grid infrastructure developments. His main responsibilities include preparing planning application documents and reports, preparing inputs for EIARs and liaising with multidisciplinary project teams.

2.1.2 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 2024, 79.5% of Ireland's energy was imported from abroad, far higher than the European Union (EU) 2023 average of 58.3%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 provision of the Proposed Project would aid in achieving the shift to decarbonising the electricity sector and energy security in Ireland.

2.1.3 Need for the Proposed Project

Ireland's Climate Action Plan 2025 sets ambitious yet essential targets for renewable energy, including 9GW of onshore wind capacity by 2030 and an 80% share of renewable electricity by the same year. However, multiple assessments, including the Climate Change Advisory Council (CCAC) Annual Review 2025 and the Environmental Protection Agency (EPA) emissions projections², confirm that Ireland is not on track to meet these targets. Significant gaps remain in renewable energy deployment, particularly in grid capacity expansion, as well as onshore and offshore wind energy development, while continued reliance on fossil fuels threatens national and EU climate commitments.

Failure to meet binding EU targets will expose Ireland to financial penalties, increased carbon credit costs, and continued dependence on fossil fuel imports - posing serious risks to energy security and economic stability. Furthermore, Ireland's national interest, as outlined in Section 143(1) of the Act

¹ *Energy in Ireland - 2025 Report* (Sustainable Energy Authority of Ireland, December 2025)

² *Ireland's Greenhouse Gas Emission Projections 2024-2050* (Environmental Protection Agency, May 2025)

requires the rapid expansion of renewable energy, making this a matter of strategic economic and social importance.

Every viable renewable energy project plays a crucial role in meeting Ireland's climate targets. The approval of well-planned, appropriately located renewable energy projects, such as the Proposed Project is not just beneficial, it is imperative. Without decisive action to facilitate renewable energy deployment, Ireland risks missing national and EU commitments, incurring financial penalties, and undermining energy security.

Please see the accompanying Planning Report and Section 1.6 of Chapter 1 of this EIAR for further information on the need for the Proposed Project.

2.2

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 Report³ published in 2021 provides a stark assessment of global climate change and presents evidence that climate changes will increase in all regions of the globe over the coming decades and that much of the damage caused by climate change up to this point is now likely irreversible, such as the rise in sea levels over the course of the 21st century.

The Synthesis Report⁴ of the IPCC Sixth Assessment Report published in March 2023 summarises the state of knowledge of climate change, its widespread impacts and risks. The Synthesis Report states that *'continued global warming is projected to further intensify the global water cycle, including its variability, global monsoon precipitation, and very wet and very dry weather and climate events and seasons'*. The IPCC's projections are evident in extreme climate events occurring across the world.

According to the World Meteorological Organisation's (WMO) *State of the Global Climate 2025*, published in March 2026⁵, atmospheric concentrations of carbon dioxide, methane and nitrous oxide continued to increase, following record levels observed in 2024. The report confirms that 2015–2025 were the eleven warmest years on record. The year 2025 was the second or third warmest year in the 176-year observational record, depending on the dataset used, at approximately 1.43°C above the 1850–1900 pre-industrial average. The year 2024 remains the warmest year on record⁶.

"The European State of the Climate Report 2025" produced by WMO and European Union⁷ indicated that:

- Almost the entire continent saw above-average annual temperatures and several northern European countries recorded their warmest or second-warmest year.
- The continent saw its second most severe heatwave on record, while sub-Arctic Fennoscandia experienced its longest heatwave on record.
- Wildfire burnt area and fire emissions both reached record levels.
- The annual sea surface temperature for the region was the highest on record.
- Glaciers in all regions saw a net mass loss.
- The Greenland Ice Sheet lost around 139 gigatonnes of ice.
- End-of-season snow cover extent and mass were both the third lowest on record.

³ *Climate Change 2021 'The Physical Science Basis' (Intergovernmental Panel on Climate Change, August 2021)*

⁴ *Climate Change 2023 Synthesis Report (Intergovernmental Panel on Climate Change, 2023)*

⁵ *State of the Global Climate 2025 (World Meteorological Organisation, March 2026)*

⁶ *State of the Global Climate 2025 (World Meteorological Organisation, March 2026)*

⁷ *The European State of the Climate Report 2025 (World Meteorological Organization and European Union, April 2026)*

- It was one of the three driest years for soil moisture since 1992.
- Annual river flow was below average in 70% of rivers.
- Renewables supplied nearly half (46.4%) of the continent's electricity, with solar power reaching a new contribution record of 12.5%.

"The Annual Climate Statement for 2025" produced by MET Eireann⁸, also gives depicts a clear long-term warming trend in Ireland's climate, characterised by record-high annual and seasonal temperatures, increasing frequency of extreme weather events, and persistent above-average rainfall. The Statement indicates that:

- The average annual air temperature for Ireland in 2025 was 11.14 °C, which is 1.59°C above the 1961-1990 long-term average (LTA) or 0.97°C above the most recent 1991-2020 LTA.
- 2025 was the second warmest year on record, which is only slightly behind the warmest year in 2023 (11.21 °C).
- The last 4 years (2022-2025) were the 4 warmest years on record with 2024 and 2007 tying for 4th warmest, and seven of the top ten warmest years have occurred since 2005.
- The coldest year on record was in 1919 with 8.73 °C, of the top ten coldest years – none have occurred since 2000.
- Provisionally rainfall data suggests 2025 was the 15th wettest year since 1941, 104% of the 1991-2020 LTA, with observed average of 1,338.7 mm.

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 Proposed Project 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.

2.2.1

International Climate Policy

United Nations Framework Convention on Climate Change

In 1992, countries joined an international treaty, the United Nations Framework Convention on Climate Change (UNFCCC), as a framework for international efforts to combat the challenge posed by climate change. The UNFCCC seeks to limit average global temperature increases and the resulting climate change. In addition, the UNFCCC seeks to cope with impacts that are already inevitable. It recognises that the climate system is a shared resource whose stability can be affected by industrial and other emissions of carbon dioxide and other greenhouse gases. The framework set no binding limits on greenhouse gas 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 greenhouse gases.

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:

⁸ Annual Climate Statement for 2025 (MET Eireann, January 2026) <https://www.met.ie/annual-climate-statement-for-2025>

- 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 greenhouse gases (GHG) to be reported on by Parties in the second commitment period; and
- Amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period.

Under the protocol, countries must meet their targets primarily through national measures, although market-based mechanisms (such as international emissions trading) can also be utilised. 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) that have ratified the Convention in a different country, to evaluate its implementation and negotiate new commitments. COP21 was organised by the United Nations in Paris and held 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 (underlined for emphasis),

“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 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 greenhouse gas 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 the 21st Conference of Parties of the United Nations Framework Convention on Climate Change 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 are 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. Three issues which emerged between States from the COP25 are summarised below:

- There was no uniform consensus between States to raise countries’ climate ambitions, e.g. to make increased commitments in light of growing climate change data. Some States were opposed to imposing any obligation on countries to submit enhanced pledges next year, arguing it should be each country’s own decision. All states were required to submit a review of their commitments for COP26 in 2020. At the current level of climate targets, within a decade, the objective of the Paris Agreement will no longer be achievable;
- There was no agreement on finalising Article 6, the foundations for international cooperation to combat climate change. The aim was to establish the rules for new international mechanisms for financing and transferring GHG emission reductions; and
- There was no agreement on financing (Green Climate Fund); specifically, relating to both loss and damage caused by climate change.

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 include, but are not limited to:

- Ensures environmental integrity and enables the highest possible mitigation ambition;
- Delivers an overall mitigation in global emissions, moving beyond zero-sum offsetting approaches to help accelerate the reduction of global GHG emissions;
- Prohibits the use of pre-2020 units, Kyoto units and allowances, and any underlying reductions toward Paris Agreement and other international goals; and,
- Ensures that double counting is avoided and that all use of markets toward international climate goals is subject to corresponding adjustments.

These principles received backing from 23 EU nations, including Ireland, as well as countries in Latin America, 5 Pacific islands, and 2 Caribbean nations.

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-Sheikh

COP27 took place in Sharm el-Sheikh from the 6th of November to the 20th of November 2022. COP27 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. After further discussion, a consolidated final document was produced and, while it removed much of the vague wording of the first 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 COP 27 are outlined below:

- **Phase down/out language:** The final agreement was delayed due to the stance of China and India, among others, who were not comfortable with the '*phase out*' of coal wording in the draft text. This led to the watering down of this commitment to a '*phase down*' of coal use. The hope was that COP27 would work to include further language on coal and fossil fuel reduction efforts. However, the wider commitment to phase out all fossil fuels, led by India, and backed by the US and the EU, was taken out and can be marked as the biggest disappointment of COP27.
- **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 1,500GW 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 European 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 European Green Deal focuses on 3 no. key principles for the clean energy transition, which will help reduce greenhouse gas emissions and enhance the quality of life for citizens:

1. *Ensuring a secure and affordable EU energy supply;*
2. *Developing a fully integrated, interconnected and digitalised EU energy market; and*
3. *Prioritising energy efficiency, improving the energy performance of our buildings and developing a power sector based largely on renewable sources (e.g. the subject development)*

The European Climate Law (Regulation (EU) 2021/1119 of the European Parliament, as amended) entered into force on 29th July 2021. The European Climate Law 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 greenhouse gas 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 greenhouse gases 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 greenhouse gas 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 proposals⁹ to make the EU's climate, energy, transport and taxation policies fit for reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels.

Achieving these emission reductions in the next decade which is crucial to Europe becoming the world's first climate-neutral continent by 2050 would clearly be assisted by the Proposed Project.

2.2.1.1 Project Compliance with International Climate Policy

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

The Proposed Project 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 Proposed Project, are not implemented. The construction of this renewable energy development 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.

2.2.2 National Climate Policy

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

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

The Programme states that the next ten years are a critical period in addressing the climate crisis, and therefore, a deliberate and swift approach to reducing more than half of Ireland's carbon emissions over the course of the decade (2020-2030) must be implemented. The programme states that the Government are committed to reducing GHG emissions by an average 7% per annum over the next decade in a push to achieve 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 *“is committed to achieving 80% of Ireland's electricity generation from renewable sources by 2030”* through the acceleration of the renewable energy deployment.

Climate Action and Low Carbon Development Act 2015 (as amended)

⁹ 'Fit for 55': delivering the EU's 2030 Climate Target on the way to climate neutrality (July 2021).

The Climate Action and Low Carbon Development Act 2015 (as amended) (‘the Climate Act’) establishes a legislative precedent to reduce Ireland’s carbon emissions, legally binding 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 also incorporates the following key provisions:

- Embedding the process of setting binding and ambitious emissions-reductions targets in law;
- Providing 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;
- Setting out 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;
- Strengthening the role of the Climate Change Advisory Council;
- Setting out that 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.

Section 15(1) of the Climate Act places an obligation on public bodies to perform their functions in a manner which favours climate action, unless it is objectively impracticable to do so.

“A relevant body shall, in so far as practicable, perform its functions in a manner consistent with:

- a) the most recent approved climate action plan,*
- b) the most recent approved national long term climate action strategy,*
- c) the most recent approved national adaptation framework and approved sectoral adaptation plans,*
- d) the furtherance of the national climate objective, and*
- e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.”*

Coolglass Supreme Court Judgement

A significant development in Irish planning law in relation to the obligations on public bodies in accordance with Section 15 of the Climate Act is directly relevant to the determination of the Proposed Project. The legal analysis of Section 15 of the Climate Act has arisen from a challenge to a decision of ACP to refuse planning permission for a wind farm in County Laois. The Supreme Court issued a judgment on this matter on 4th February 2026 in Coolglass Wind Farm Limited v An Coimisiún Pleanála [2026] IESC 5.

The implications for public bodies in exercising their functions in accordance with Section 15 of the Climate Act has been scrutinised by the Irish legal system. The Supreme Court judgment on 4th February 2026 (Coolglass Wind Farm Limited v An Coimisiún Pleanála [2026] IESC 5) confirmed that consenting authorities must make decisions in a manner ‘consistent with’ the approved national long term climate action strategy, ‘in so far as is practicable’. This means that departure from climate objectives is permissible but only where there are genuine practical difficulties that make full alignment impracticable.

Consenting Authorities, in making a decision on this application, must meaningfully engage with national climate objectives when exercising their decision-making functions. Consenting Authorities must also ensure that their decision on an application falls within a spectrum of outcomes which can be considered to be consistent with, in so far as practicable, national climate objectives.

Taking these legal duties into account, ACP is required to attribute significant weight to national climate policy and the delivery of renewable energy infrastructure, such as the Proposed Project, even where they materially contravene a statutory development plan, particularly when that plan is out of step with national policy.

The significance of the judgement is that Consenting Authorities, including ACP are now under clear, legal duty to give meaningful consideration of the contribution made to the achievement of national climate targets by renewable energy developments, such as the Proposed Project. This is of particular importance where a development would advance decarbonisation targets.

The Proposed Project comprises of a renewable energy development, which will make a meaningful contribution to the fulfilment of national climate objectives, including those set out in the Climate Action Plan 2025 (CAP25), which sets out targets to achieve an 80% electricity share as well as 9GW of renewable energy by 2030.

Considering the Coolglass Supreme Court Judgement, ACP is required to attribute a significant weight to the following benefits in their assessment of the Proposed Project:

- The Proposed Project will contribute to compliance with Ireland’s sectoral ceilings and Ireland’s carbon budgets,
- It will generate renewable electricity and help to displace fossil-fuel based generation,
- It will further national climate objectives, including the CAP25 target of an 80% renewable electricity share as well as 9GW of renewable energy by 2030,
- It will support Ireland’s legally binding commitments under national, European and International climate law.

Therefore, a decision to grant permission for the Proposed Project would represent the performance of ACP’s functions in a manner that is consistent with Section 15(1) of the Climate Act.

Carbon Budgets

To achieve the 51% emissions reduction target, the Climate Act, requires the Climate Change Advisory Council (CCAC) to recommend a proposed programme of economy-wide 5-year Carbon Budgets to the Minister for the Environment, Climate and Communications. The first national carbon budget programme proposed by the Climate Change Advisory Council, approved by Government and adopted by both Houses of the Oireachtas in April 2022 comprises three successive 5-year carbon budgets¹⁰. The total emissions allowed under each budget are shown in Table 2-1 below.

¹⁰ Carbon Budget Technical Report (Climate Change Advisory Council, October 2021)

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

	2021 – 2025	2026 – 2030	2031 – 2035
	Carbon Budget 1	Carbon Budget 2	Provisional Carbon Budget 3
	All Gases		
Carbon Budget (Mt CO 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 Mt CO ₂ eq reducing to 33.55 Mt CO 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 greenhouse gas emissions that are permitted in each sector. The Government approved Sectoral Emissions Ceilings on 28th July 2022. The electricity sector was allocated a sectoral ceiling of 40 Mt CO₂ eq for the first budget (2021-2025) and has sectoral ceiling of 20 Mt CO₂ eq for the second budget period (2026-2030). In 2024, electricity sector emissions were 6.95 Mt CO₂ eq. With 85.2% of the budget already used, an emissions reduction of 14.8% was required for 2025 to stay within the first 2021-25 budget¹¹.

The Environmental Protection Agency (EPA) reported in May 2025¹² 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 Proposed Project 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.

¹¹ Ireland’s Final Greenhouse Gas Emissions (EPA, March 2026) <https://www.epa.ie/publications/monitoring-assessment/climate-change/air-emissions/irelands-provisional-greenhouse-gas-emissions-1990-2024.php>

¹² Ireland’s Greenhouse Gas Emissions Projections 2024-2050 (Environmental Protection Agency, May 2025)

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.

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

Climate Action Plan 2023

The Climate Action Plan 2023 (‘CAP 23’) was published in December 2022 by the Department of the Environment, Climate and Communications. This outlines the actions required up to 2035 and beyond to meet Ireland’s commitment to becoming carbon neutral by 2050. CAP 23 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.

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. CAP 23 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, 2022) with a target of 9GW of that being produced by onshore wind. Measures set out in CAP 23 to achieve these targets include to ‘*accelerate and increase the deployment of renewable energy to replace fossil fuels*’ (Section 12.1.4 of CAP 23). It is clear from the message and ambition of CAP 23 that the drive to deploy renewable energy projects such as the Proposed Project in Ireland are critical to achieving the aims and objectives of CAP 23 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 CAP 23, key to the decarbonisation of other sectors who will depend on electrification including transport, heating and industry. The increase in the portion of renewable electricity of 80% by 2030 will come in part from a targeted 9GW of onshore wind. CAP 23 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. The measures set out for 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 9 GW onshore wind, 8 GW Solar and at least 5 GW of offshore wind by 2030;
- Target 6GW of onshore wind and to 5 GW of solar by 2025; noting that the 2025 target date has now passed and that these targets should therefore be considered in the context of the current renewable energy policy framework and future targets.
- 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 Development Plans are obliged to set out objectives to facilitate energy infrastructure.

Having regard to the targets and measures set out above, it is evident that there is strong policy support for the provision of additional renewable energy generators, such as the Proposed Project.

Climate Action Plan 2024

The Climate Action Plan 2024 ('CAP 24') builds on CAP 23 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 CAP 23 (9GW of onshore wind & 80% renewable electricity share).

CAP 24 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.

CAP 24 acknowledges the urgency and importance of the decarbonising the electricity sector. The plan states:

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

The scale of the challenge is apparent when quantified:

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

CAP 24 identifies the alignment of local and national policy as a 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”.

Having regard to the targets and measures set out above, it is clear that there is strong policy support for the provision of additional renewable energy generators, such as the Proposed Project.

Climate Action Plan 2025

The Climate Action Plan 2025 ('CAP 25') represents the third statutory update to Ireland's climate roadmap under the Climate Act. Building on the foundations laid by previous plans, CAP 25 refines and strengthens the strategies necessary to deliver Ireland's legally binding carbon budgets and sectoral emissions ceilings. It sets out a well-defined course of action to reduce greenhouse gas emissions by 51% by 2030 and to achieve climate neutrality no later than 2050.

A cornerstone of CAP 25 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 (6GW by 2025; 9GW by 2030), offshore wind (at least 5GW by 2030), and solar energy (up to 5GW by 2025; 8GW by 2030).

CAP 25 recognizes that *"A renewables-led system is at the core of Ireland's plan to radically reduce emissions in the electricity sector, protect our energy security, and ensure our economic competitiveness. This requires the accelerated and increased deployment of new renewable electricity generation capacity and related infrastructure."*

CAP 25 also lays emphasis on the importance of aligning local and national policies to accelerate the rollout of renewable energy.:

"The Planning and Development Act, 2024, the Renewable Energy Directive and the revised NPF together will ensure greater alignment between national, regional, and local authority levels to deliver on the renewable electricity ambition."

"The draft first revision of the NPF includes policy support for the development and upgrading of electricity grid infrastructure, the delivery of renewable electricity generation capacity, and the introduction of regional renewable electricity capacity allocations for each of the three Regional Assemblies by 2030"

CAP 25 sets out a clear roadmap to achieve Ireland's climate ambition, including specific 2030 targets and decarbonisation objectives. This roadmap provides strong policy support for the provision of additional renewable energy generators, such as the Proposed Project, to reach these targets.

2.2.2.1 Project Compliance with National Climate Policy

The Proposed Project, consisting of 23 no. wind turbines and associated infrastructure aligns with the national climate policy objectives. The Proposed Project will make a significant contribution to achieving the CAP 25 target of 9GW of onshore wind energy by the year 2030. Furthermore, the Proposed Project will aid Ireland in adhering to, or limiting the exceedance of, the country's carbon budgets. The proposed renewable energy project will help Ireland address the challenge of decarbonising electricity generation as well as address the country's over-dependence on imported fossil fuels. Therefore, it is considered that the Proposed Project is in compliance with climate policy.

2.3 Renewable Energy Policy and Targets

This section of the EIAR provides a breakdown of international and national renewable energy policy with regard to the Proposed Project. 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 Proposed Project 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.

2.3.1 European Renewable Energy Policy

2.3.1.1 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 24.5% in 2023¹³. 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 packages. 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 Directive¹⁴ (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 at 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 Article 15c of RED III, EU member states must identify 'Renewables Acceleration Areas' of where projects will undergo a simplified and fast-track procedure. RED III defines the timeframes for the permit-granting procedure. In Renewables Acceleration Areas, the permit-granting procedure shall not exceed 12 months for renewable energy projects and outside renewables acceleration areas the permit granting procedure shall not exceed two years.

¹³ <https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20241219.3>

¹⁴ 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)

Central to REDIII is the presumption that renewable energy development must be considered to be **in the overriding public interest** when addressing competing interests under the Habitats Directive (92/43/EEC), Birds Directive (2009/147/EEC) and the Water Framework Directive (2000/60/EC). The recognition of renewable energy projects being in the ‘*overriding public interest*’ was originally introduced under Article 3(1) of emergency Regulation 2022/2577 of 22nd December 2022 named ‘*laying down a framework to accelerate the deployment of renewable energy*’ in response to REPowerEU which found that the permitting process is the biggest bottleneck for deploying wind at scale, with approximately 80 GW of wind power capacity stuck in permitting procedures across Europe.

Article 16f of RED III states:

“By 21 February 2024, until climate neutrality is achieved, Member States shall ensure that, in the permit granting procedure, the planning, construction and operation of renewable energy plants, the connection of such plants to the grid, the related grid itself, and storage assets are presumed as being in the overriding public interest and serving public health and safety when balancing legal interests in individual cases for the purposes of Article 6(4) and Article 16(1), point (c), of Directive 92/43/EEC, Article 4(7) of Directive 2000/60/EC and Article 9(1), point (a), of Directive 2009/147/EC.”

There is an 18-month period to transpose most of the directive's provisions into national law which ended on the 1st of July 2025, with a shorter deadline of July 2024 for some of the provisions related to permitting for renewables. In September 2024, the EU Commission opened infringement proceedings against Ireland for failures in relation to the transposition of permitting procedures. On the 17th of July 2025, the EU decided to send a ‘reasoned opinion’, a formal request to comply with EU law, giving Ireland two months to respond and take the necessary measures to complete the transposition.

In August 2025, some of the provisions of RED III were transposed into national law through the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. No. 274 of 2025). This legislation was 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). Importantly, renewable energy developments, including related grid and storage infrastructure, are now presumed to be in the **overriding public interest**.

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 RED (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.

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 Proposed Project will aid in achieving the scenarios set out in the Energy Roadmap 2050, by increasing 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 above, 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 RED as per the 'Fit for 55' package (July 2021)¹⁵. The European Green 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 sources¹⁶.*

The Proposed Project will support the objectives of the European Green Deal by increasing the contribution of renewable energy to the national electricity grid, supporting the decarbonisation of the energy system and reducing reliance on fossil fuel-based electricity generation.

REPowerEU

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

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

In September 2023, the European Parliament agreed to update the RED. 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

¹⁵ <https://www.consilium.europa.eu/en/policies/eu-plan-for-a-green-transition/>

¹⁶ https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/energy-and-green-deal_en

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.”*

The REPowerEU Plan therefore highlights the importance of accelerating the deployment of renewable energy and streamlining the consenting process to support the achievement of renewable energy targets. The Proposed Project will contribute to these objectives by increasing renewable electricity generation and supporting the transition to a more secure and resilient energy system.

AccelerateEU - Energy Union

In a communication dated 22nd April 2026, the European Commission addressed the vulnerability of Europe’s dependency on fossil fuel imports as evident by the rising energy costs. The AccelerateEU plan is a comprehensive plan of actions and measures by the European Commission in response to the energy crisis triggered by the conflict in the Middle East and the closure of the Strait of Hormuz.

The plan consists of five key areas of action which aim to support member states in providing short-term relief to energy consumers most affected by the crisis. It also sets an accelerated path to achieving a more resilient energy system in the medium and long term:

- Greater coordination between Member States and with international partners;
- Supporting Member States to protect consumers, including industry, from price shocks, and simultaneously helping them in the energy transition;
- Accelerating the shift to homegrown clean energy and electrification;
- Stepping up our energy system; and
- Boosting investment by mobilising both public and private funding for the energy transition.

The communication places a strong emphasis on the need to *“accelerate electrification, the roll out of additional domestic clean energy production and the energy transition”*. The following is also stated in relation to renewable energy developments:

“By taking immediate action to generate strong results in the medium-term, Member States can replace significant volumes of oil and gas by accelerating the shift to clean, homegrown and abundant energy, including through electrification, deployment of solar thermal and geothermal energies as well as other renewable energy, nuclear, biomethane, sustainable biofuels and hydrogen.

For example, the capacity of renewable electricity deployed per year should increase to 100 GW/year, including through new large-scale renewable energy projects and accelerated solar deployment, which can deliver rapid results. To deliver at pace, it is therefore critical to streamline national permitting regimes in line with the requirements set in EU legislation. Beyond transposition efforts, frontloading implementation can deliver concrete results. By the end of 2026, the length of permitting procedures should decrease across Europe to maximum two years and each Member State should unlock the potential of renewable acceleration areas by establishing at least one.”

Ultimately, the European Commission asserts the need to accelerate the transition to a renewable led energy sector in the interest of preserving the overall socio-economic and energy security in the EU.

2.3.1.1.2 Project Compliance with EU Policy

The Proposed Project 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 Proposed Project 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 Proposed Project aligns with this long-term vision.

Regulation 2022/2577 introduced significant measures to facilitate the acceleration of the deployment of renewable energy, including an obligation on member states to prioritise the roll out of renewable energy projects when balancing competing legal interests. Furthermore, 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 Proposed Project directly supports these objectives and is therefore considered to be strongly underpinned by current EU energy policy.

The provisions of Regulation 2022/2577, the REPowerEU and the AccelerateEU Plans are applicable to the current planning application and EIAR, and they provide further justification for granting consent for the Proposed Project.

2.3.2 National Renewable Energy Policy

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

In May 2014, the Green Paper on Energy Policy in Ireland was launched which marked the start of a public consultation process on the future of Ireland's energy policy over the medium to long-term. The Department of Communications, Climate Action & Environment (now the Department of the Environment, Climate and Communications or DECC) acknowledged that energy is an integral part of Ireland's economic and social landscape and that

“a secure, sustainable and competitive energy sector is central to Ireland's ability to attract and retain Foreign Direct Investment and sustain Irish enterprise. The three key pillars of energy policy are to focus on security, sustainability and competitiveness”.

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

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

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

“Onshore wind continues to be the main contributor (18.2% of total generation and 81% of RES-E 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.”

National Energy Security Framework

More recently, the National Energy Security Framework (NESF) (DECC, April 2022) highlights clearly the impacts the Russian invasion of Ukraine and the resulting war have 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 (2025) report, oil accounts for 49% 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 NESF 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 NESF highlights that replacing fossil fuels with renewables, including wind energy, will be a focus area of work. The NESF 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 NESF 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.

Having regard to the above, it is clear that the provision of additional renewable energy generation, such as the Proposed Project, 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.”

The energy security package includes a range of measures to implement this approach by the prioritisation of the following:

1. *Reduced and Responsive Demand.*
2. *Renewables-Led System.*
3. *More Resilient Systems*
4. *Robust Risk Governance.*

Independent research undertaken as part of the package, McCarthy Report¹⁷, 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. The additional measure most relevant to the Proposed Project is as follows:

“Action 10: To implement Planning and Consenting System Reforms and provide greater certainty to the sector.”

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

The Proposed Project will significantly support the government's objectives in ensuring the State's energy security. The Proposed Project serves as a domestic renewable energy generator capable of providing clean electricity to the national electricity grid, contributing to a renewables-led system.

2.3.2.1 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 is evident that the Proposed Project 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.

2.4 Climate and Renewable Energy Target Progress

At a European level, the latest data shows that, as of 2024, 25.2% of energy came from renewable energy sources¹⁸. This represents an increase of 0.8% compared to 2023 levels. While progress is being made to increase the share of renewable energy, it is clear that all EU member states need to intensify their efforts to collectively comply with the target of 42.5% set in the latest revision of the renewable energy directive.

¹⁷ <https://www.gov.ie/pdf/?file=https://assets.gov.ie/276441/eb496e01-5c01-4594-af09-74342b4ac971.pdf#page=null>

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

Of the 27 EU member states, Ireland had one of the lowest proportions of renewable energy at 16% in 2024¹⁹. It is evident that Ireland is not performing well when compared against our European counterparts and that urgent action is required to increase the overall share of renewable energy in our gross final energy consumption. When it comes to the share of renewable energy in electricity, Ireland does perform better generating 41.3% in 2024, but still below the EU average of 47.5%²⁰, please see Figure 2-1 below.

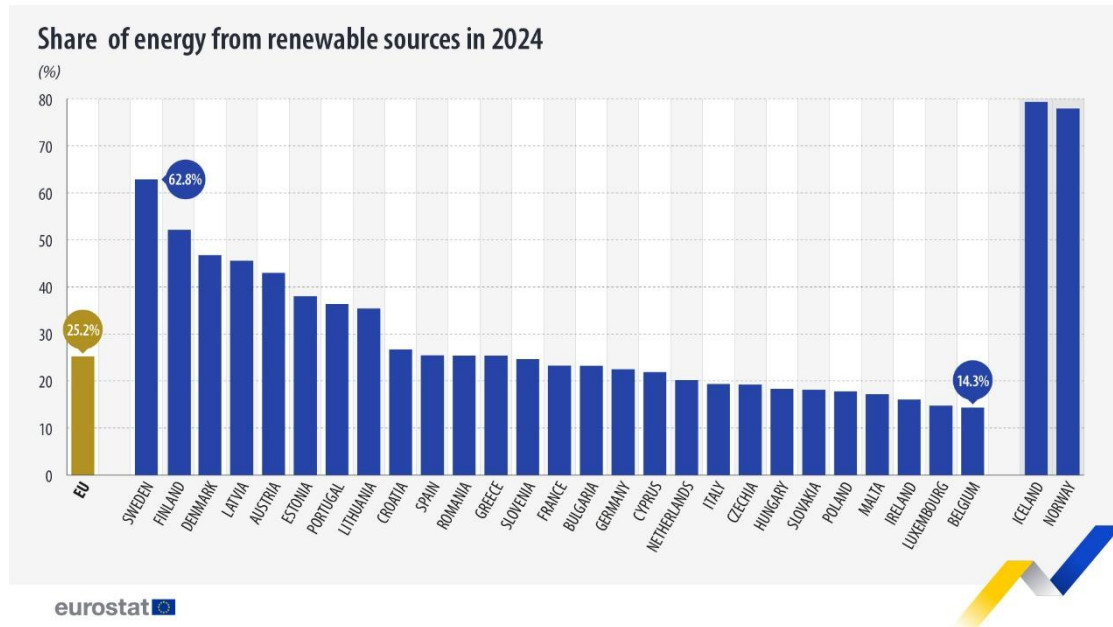


Figure 2-1 Overall share of energy from renewable sources (source: Eurostat)

Ireland's Greenhouse Gas Emissions Projections 2024 – 2055 (May 2025)

The EPA published Ireland's Greenhouse Gas Emission Projections and at the time of writing, the most recent report, *'Ireland's Greenhouse Gas Emissions Projections 2024-2055'* 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 greenhouse gas emissions projections to 2050, 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 GHG emission inventory data is available, known as the 'base year' for projections. The WAM scenario has a higher level of ambition and includes government policies and measures (at the time the Projections are compiled) to reduce emissions such as those in Ireland's CAP 25.

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 CAP 25 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.

¹⁹ https://ec.europa.eu/eurostat/statistics-explained/index.php?title=File:Renewable_energy_2024_infographic.jpg

²⁰ https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Renewable_energy_statistics

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

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

The most notable conclusion drawn from the Report is the significant gap between projections across both the WEM and WAM scenarios and the legally binding national and EU emission reductions targets. The Report states that even with full implementation of CAP 24, Ireland is projected to face significant gap in meeting many legally binding energy and climate obligations, including national carbon budgets and sectoral emissions ceilings, and EU obligations on renewable energy, energy efficiency and greenhouse gas emissions.

The SEAI projections explore the risk scenarios WEM and WAM, the aim being to address the gap between current policy trajectories and the most ambitious planned policies scenarios. The SEAI WEM and WAM scenario modelling considers the latest CAP published at the time of policy assumptions for the modelling scenarios (CAP 24).

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 30.9MtCO₂eq, 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 reached 5.1 GW by March 2026, falling short of the 2025 CAP target of 6 GW. Ireland therefore missed its 2025 wind-capacity target by around 0.9 GW, or 15%. Ireland’s 2030 CAP targets remain 9 GW of onshore wind and 5 GW of offshore wind capacity. 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 as Figure 2-2, illustrates the year-on-year increase in installed wind capacity required to align the pace of the WAM.

Figure 1.25: Year-to-year increases in installed wind capacity to 2024, and year-to-year increases in WAM capacity projections of capacity from 2025 to 2030

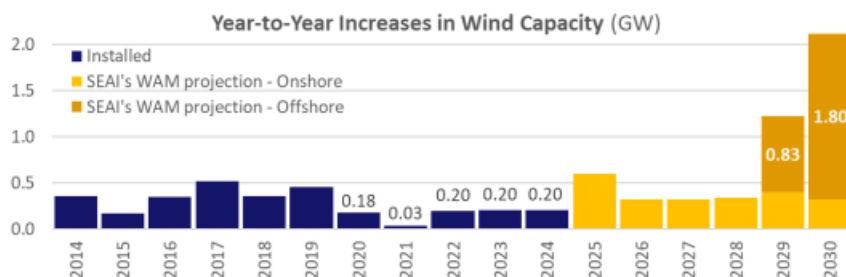


Figure 2-2 Ireland's year-to-year increases in installed wind capacity required to align the pace of the WAM

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 ±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*’²¹ 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.”

This recommendation was not met, with Ireland assuming the Presidency of the Council of the European Union on the 1st July 2026 with outstanding climate- and energy-related EU transposition requirements.

The Climate Change Advisory Council Annual Review 2026 – Electricity

The CCAC published its annual review in May 2026 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:

“Renewable generation capacity reached 7.7 GW by the end of 2025; however, only 0.8 GW of new solar and wind capacity was added, far below the 2 GW needed annually to meet the 2030 Climate Action Plan target of up to 23.6 GW. Targets were also missed for the share of electricity demand met by renewables, with rising data centre demand offsetting gains in renewable generation, and for dispatch-down, which reflects renewable electricity that is wasted due to grid limitations.”

Key observations in relation to Renewable Electricity are outlined below:

- Ireland reached 7.7 GW of renewables generation capacity by the end of 2025, with 5.1 GW from onshore wind, 1.1 GW from grid-scale solar, 0.8 GW from domestic rooftop solar and 0.7 GW from other renewable sources (e.g. hydro).
- Only 0.6 GW of new solar capacity and 0.2 GW of new wind capacity were added in 2025, far less than the 2 GW that needs to be added each year until 2030 to hit Climate Action Plan targets.
- 2025 saw the failure of multiple key Climate Action Plan targets, including both onshore wind and solar capacity, dispatch-down and renewable electricity share of demand. The renewable electricity share of demand has stagnated in recent years due to any added

²¹ <https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR-2025-SfA-final.pdf>

renewable generation capacity being matched by increasing data centre electricity demand.

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 Ireland 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 assist in achieving Ireland statutory climate targets. Ireland’s no-regret options are demanding 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); Ireland’s 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.”

In regard to the above, the provision of new renewable energy generation through the Proposed Project is in accordance with, and directly supports, Ireland's national climate and energy policy objectives.

2.5 Planning Policy Context

2.5.1 Introduction

This section of the EIAR provides the strategic planning context of the Proposed Project. As is examined below, the Proposed Project 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 Proposed Project 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.

2.5.2 National Planning Policy Context

The Planning and Development Act 2024

The Planning and Development Act 2024 (the 2024 Act) was signed into law by the President on the 17th of October 2024, following its passage through both Houses of the Oireachtas. The 2024 Act is being commenced on a phased basis, with the remaining provisions, including the relevant development consent provisions, anticipated to be brought into operation shortly after this application is lodged. Once those provisions are commenced and section 37E of 2000 Act is repealed, new applications of this nature will fall to be made under Chapter 4 of Part 4 of the 2024 Act. This will not, however, alter the statutory procedure applicable to this application.

However, section 626(a) of the 2024 Act provides that, notwithstanding the repeal of the relevant provisions of the Act, the Act will continue to apply and have effect in relation to an application for permission made under the Act before such repeal.

Accordingly, provided that this application is made before the repeal of section 37E, it will remain governed by the Act and will continue to be processed and determined by ACP under section 37E and the associated provisions of that Act, notwithstanding the subsequent commencement of the corresponding provisions of the 2024 Act.

National Planning Framework First Revision (2025)

On 8th 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 for CAP24 and is supported under CAP25. The Southern Region, in which the Proposed Project is located, is allocated a target of installing an **additional 978 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 Southern 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 Proposed Project 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 the 4th of October 2021 and sets out the major public investment projects identified by the 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 Proposed Project, climate change.

Reflecting on the recent publication of the IPCC’s 6th Assessment Report, the NDP notes that the Irish Government is fully committed to ‘playing its part’ to ensure that the worst climate change damage can be avoided, e.g. significant reductions in CO₂ and other GHG emissions as assisted by the achievement of both European and national renewable energy targets. Specifically, the NDP states that,

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

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

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

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 ambitious and an explicit driver for the deployment of new renewable generators e.g. the Proposed Project, and the safeguarding / maintenance of existing assets. It is noted that the reliability of electricity supplies will also be strengthened through investment in the electricity

transmission and distribution grid. The focus of investment in regulated network 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 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 Proposed Project.

Under the National Development Plan Review 2025, the Department of Climate, Energy and the Environment have been allocated €9.14 billion in capital funding for 2026 – 2030. This includes €3.5 billion in new equity to EirGrid and to ESB, a significant investment aimed at expanding Ireland’s onshore and offshore electricity transmission and distribution network infrastructure. This investment aims to support Ireland’s transition to a secure, sustainable, and affordable ‘*renewables-led energy system*’.

2.5.2.1 Project Compliance with the National Policy

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

The Revised NPF projects a population increase of approximately one 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 Revised NPF recognises the need for increased renewable energy onto the national grid.

The NDP is clear in its priority to reach a low-carbon, climate resilient society over the lifetime of the NDP. The Proposed Project, if permitted, will provide clean, renewable electricity to the national grid, furthering development objectives of the NDP, namely the target to increase the share of renewable electricity up to 80% by 2030.

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 addition of 23 no. wind turbines, with an estimated electricity generation capacity of c. 145.2MW, will contribute to Ireland's national targets and support the country in meeting its renewable energy and carbon emission reduction goals at the EU level.

2.5.3 Regional Policy

Southern Regional Assembly Regional Spatial & Economic Strategy

The Southern Regional Assembly (SRA) was established in 2015 and the Regional Spatial and Economic Strategy (RSES) for the Southern Region (Carlow, Clare, Cork, Kerry, Kilkenny, Limerick, Tipperary, Waterford and Wexford) came into effect on 31st January 2020. The RSES provides a long-term, strategic development framework for the future physical, economic and social development of the Southern Region. The RSES seeks to achieve balanced regional development and full implementation of Project Ireland 2040 – the National Planning Framework.

Adopted on the 31st of 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 RSES primarily aims to support the delivery of the programme for change set out in Project Ireland 2040, the National Planning Framework (NPF) and the National Development Plan 2018-27 (NDP). As the regional tier of the national planning process, it will ensure coordination between the City and County Development Plans (CCDP) and Local Enterprise and Community Plans (LECP) of the ten local authorities in the Region.”

The RSES is committed to the implementation of the Climate Action Plan 2019 (superseded by CAP 25) by playing its part in the development of renewable energy. The ambition is reflected in the Regional Policy Objectives (RPO’s) which sets out the key regional policies for the 12-year lifetime of the plan.

➤ **RPO 87: Low Carbon Future:** *The RSES is committed to the implementation of the Climate Action Plan 2019 by playing its part in the development of renewable energy. This is clearly reflected in the Regional Policy Objectives (RPO’s) which sets out the key regional policies for the lifetime of the plan, from 2018 – 2030*

The RSES recognises the Region’s ample resources in regard to renewable energy. Over the next ten years there is a predicted growth in electricity demand and extra generating capacity will be required to accommodate this demand. Wind energy is recognised as a major source of renewable energy generation capable of providing clean electricity to the grid and meeting Ireland’s energy needs.

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

To achieve national and EU targets in the context of the electricity sector, the RSES notes that further investment is required to develop alternative renewable energies with greater interconnection to energy resources. This key enabling action is captured under Strategic Aim 8 which sets out the need to “safeguard and enhance the environment through sustainable development, prioritising action on climate change across the region, driving the transition to a low carbon and climate resilient society.” Both the NPF and RSES emphasise, however, that the planning process is well placed to implement and integrate climate change objectives.

➤ **RPO 9 (Holistic Approach to Delivering Infrastructure):** *It is an objective to ensure investment and delivery of comprehensive infrastructure packages to meet growth targets that prioritise the delivery of compact growth and sustainable mobility as per the NPF objectives including for renewable energy climate change adaptation.*

The RSES sets out a number of Regional Policy Objectives (RPOs) designed to facilitate greater integration of renewables into the national grid. The RSES notes that there is significant potential to use renewable energy across the Region to achieve climate change emission reduction targets. As such, the RSES supports renewable industries such as the Proposed Project.

➤ **RPO 50 (Diversification):** *It is an objective to further develop a diverse base of smart economic specialisms across the rural Region, including innovation and diversification in (among other things) renewable energy as a dynamic driver for the rural economy.*

- **RPO 87 (Low Carbon Energy Future):** The RSES is committed to the implementation of the Government's policy under Ireland's Transition to a Low Carbon Energy Future 2015-30 and Climate Action Plan 2019. It is an objective to promote change across business, public and residential sectors to achieve reduced GHG emissions in accordance with current and future national targets, improve energy efficiency and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture.
- **RPO 95 (Sustainable Renewable Energy Generation):** It is an objective to support implementation of the National Renewable Energy Action Plan (NREAP), and the Offshore Renewable Energy Plan and the implementation of mitigation measures outlined in their respective SEA and AA and leverage the Region as a leader and innovator in sustainable renewable energy generation.
- **RPO 96 (Integrating Renewable Energy Sources):** It is an objective to support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate renewable energy sources and ensure our national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grows.
- **RPO 99 (Renewable Wind Energy):** It is an objective to support the sustainable development of renewable wind energy (on shore and offshore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.
- **RPO 100 (Indigenous Renewable Energy Production and Grid Injection):** It is an objective to support the integration of indigenous renewable energy production and grid injection.

In particular, **RPO's 96, 99, and 100** reflect the strong support for renewable energy throughout the RSES. The Proposed Project will generate clean, renewable electricity contributing to the objectives of the RSES. In relation to the integration of renewable energy resources, the Proposed Project will support the use of existing grid infrastructure and the injection of renewable electricity into the grid. The Proposed Project is therefore in alignment with policy at a regional level.

The RSES also acknowledges the need to develop a strong grid to support the integration of renewable energy on to the national electricity grid. The RSES sets out a number of infrastructural RPOs, relevant to the Proposed Project which indicate that the Region's continued support and investment in renewable energy generation:

- **RPO 220 Integrated Single Electricity Market (I-SEM):** It is an objective to support the Integrated Single Electricity Market (I-SEM) as a key priority for the Region and seek the sustainable development and reinforcement of the energy grid including grid connections, transboundary networks into and through the Region and between all adjacent Regions subject to appropriate environmental assessment and planning processes.
- **RPO 221 Renewable Energy Generation and Transmission Network:** a. Local Authority City and County Development Plans shall support the sustainable development of renewable energy generation and demand centres such as data centres which can be serviced with a renewable energy source (subject to appropriate environmental assessment and the planning process) to spatially suitable locations to ensure efficient use of the existing transmission network; b. The RSES supports strengthened and sustainable local/community renewable energy networks, micro renewable generation, climate smart countryside projects and connections from such initiatives to the grid. The potential for sustainable local/community energy projects and micro generation to both mitigate

climate change and to reduce fuel poverty is also supported, The RSES supports the Southern Region as a Carbon Neutral Energy Region.

- **RPO 222 Electricity Infrastructure:** *It is an objective to support the development of a safe, secure and reliable supply of electricity and to support and facilitate the development of enhanced electricity networks and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this plan under EirGrid's (2017) Grid Development Strategy (subject to appropriate environmental assessment and the planning process) to serve the existing and future needs of the Region and strengthen all-island energy infrastructure and interconnection capacity.*

2.5.3.2 Project Compliance with Regional Policy

The RSES for the Southern Region clearly outlines its objective to support the development of renewable energy within the Region, such as the Proposed Project. It is considered that the provision of the Proposed Project would facilitate this objective and is particularly in line with **RPO 96, 99 and 100**.

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

2.5.4 Local Policy Context

2.5.5 Waterford City & County Development Plan 2022 - 2028

The Proposed Project is located within the functional area of WCCC, and the relevant policy document is the Waterford City and County Development Plan (WCCDP) 2022 – 2028 which was adopted on the 7th of June 2022 and came into effect on the 19th of July 2022. Variation no. 1 was made by WCCC on the 13th of November 2025. The WCCDP sets out the strategy for the proper planning and sustainable development of the City and County over the plan period from 2022 to 2028.

The policies of the WCCDP incorporate climate change mitigation and adaptation strategies. The strategic vision of the WCCDP is underpinned by a number of overarching goals. Of these, the following goals are considered relevant to the Proposed Project:

Core Strategic Aims 2.1.8

“Implement the Waterford City and County Council Climate Adaptation Strategy 2019 (as amended) and promote a climate resilient pattern of development and land uses which assists in achieving national climate change mitigation and adaption targets.”

2.18 Core Strategy Policy Objectives

CS 02 *“UN Sustainable Development Goals: Through implementation of the Core Strategy and the policy objectives of the Development Plan we will contribute, as practicable, towards achievement of the 17 Sustainable Development Goals of the United Nations’ 2030 Agenda for Sustainable Development, which came into force in 2016 and the outcomes derived there from as set out in Section 1.6 of Chapter 1 of the Development Plan.”*

CS 09 *“Low Carbon Future: Through the implementation of the Core and Settlement Strategies, we will put in place a pattern of land use and associated policy objectives and actions, which facilitate a just transition to a low carbon society.”*

Chapter 6 of the WCCDP 2022-2028 recognises the urgent need to move from fossil fuels to renewable and carbon neutral forms of heating and energy provision. County Waterford’s role in the delivery of renewable energy resources is acknowledged within the WCCDP, demonstrated by the strategic objective

“to promote and facilitate the provision of energy efficient, low carbon infrastructure and utilities and support infrastructure, whilst supporting industry to innovate, decarbonising the energy sector in order to contribute to a national target of zero net emissions of greenhouse gases in Ireland by 2050.”

The WCCDP identifies the following objectives to in relation to renewable energy:

Policy Objective UTL 13 Renewable Energy states that -

“It is the policy of Waterford City and County Council to promote and facilitate a culture of adopting energy efficiency/ renewable energy technologies and energy conservation and seek to reduce dependency on fossil fuels thereby enhancing the environmental, social and economic benefits to Waterford City and County. It must also be recognised that other sources of electricity generation such as natural gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand.”

“The Council recognizes and supports the role that the County can play in facilitating the onshore infrastructure required for the construction, operation and maintenance of offshore wind farm developments. This infrastructure includes but is not limited to: construction facilities, storage and lay-down areas, cable landfalls, onshore cable routing to substations, port and harbour infrastructure and coastal operations and maintenance bases, as well as use, reuse or repowering of existing infrastructure where appropriate.”

“Promote and encourage the use of renewable energy, and low carbon resources, namely solar photovoltaic, geothermal, heat pumps, district heating, solar thermal, hydro, tidal power, offshore and onshore wind, biomass as well as micro-generation among business, agriculture, education, health, and other sectors.”

“To support in conjunction with other relevant agencies, wind energy initiatives, both onshore and offshore, and wave energy, and onshore grid connections and reinforcements to facilitate offshore renewable energy development when these are undertaken in an environmentally acceptable manner.”

Table 6.3 of the WCCDP identifies a 2030 onshore-wind target of 211.20 MW for County Waterford.

The Proposed Project would add approximately 145.2 MW of installed onshore-wind capacity and would therefore make a material contribution to the county target and to the transition away from fossil-fuel electricity generation.

The elements of UTL 13 particularly relevant to the Proposed Project include:

- supporting renewable-energy delivery towards the targets in Table 6.3 of the WCCDP;
- assessing generation, transmission and distribution infrastructure in accordance with the Waterford Renewable Energy Strategy, its wind-energy designation map, the Waterford Landscape and Seascapes Character Assessment and national wind-energy guidance;
- promoting renewable-energy generation and low-carbon resources;
- supporting effective community engagement and participation;
- considering reasonable alternatives and the efficient use of existing assets; and
- providing for decommissioning and restoration.

The Proposed Project combines onshore wind generation with the grid infrastructure required to connect it to the existing transmission system. In considering its consistency with UTL 13, regard has been had to the Site's Preferred Area designation, the detailed landscape and environmental assessments, the reasonable alternatives considered, the community engagement undertaken and the commitments set out in the application documentation.

The WCCDP therefore provides positive policy support for the principle of the Proposed Project, subject to compliance with its detailed criteria and ACP's assessment of the project-specific effects.

Table 2-2 summarises the principal Development Plan policies relevant to the Proposed Project and identifies how they are addressed in the application documentation.

Table 2-2 Compliance with WCCDP Policies & Objectives

Policy	Relevant requirement	Proposed Project response
WCCDP CS 06 – Core Strategy Policy Objectives	Environmental Directives <i>We will require, where appropriate, all plans and projects within Waterford to comply with the requirements of the Strategic Environmental Assessment Directive, the Habitats Directive, Water Framework Directive and Floods Directive.</i>	The Proposed Project is aligned with WCCDP CS 06 through its compliance with the EU Habitats Directive, Water Framework Directive, EIA Directive, Floods Directive and Birds Directive in preparation of the EIAR and relevant technical assessments.
WCCDP CS 09 – Core Strategy Policy Objectives	Low Carbon Future <i>Through the implementation of the Core and Settlement Strategies, we will put in place a pattern of land use and associated policy objectives and actions, which facilitate a just transition to a low carbon society.</i>	The Proposed Project is broadly aligned with the local transition to renewable energy and with community-participation objectives. It does not rely on the Council's own-emissions target as a direct development-management test.
WCCDP 9.0 Climate Action, Biodiversity & Environment	It is an objective of Waterford City & County Council to: <i>a) Integrate climate change and adaptation considerations into land-use policy objectives and decision-making processes to enhance our resilience to the effects of Climate Change and reducing our carbon footprint.</i> <i>We will protect, manage, and enhance the natural heritage, biodiversity, landscape and environment of Waterford City and County in recognition of its importance as a non-renewable resource, providing a unique identity and character for the City and County as a natural resource asset.</i>	The Proposed Project is consistent with WCCDP 9.0 by supporting the transition to renewable energy and contributing to the reduction of greenhouse gas emissions associated with electricity generation. The development has also been designed and assessed with regard to the protection of biodiversity, natural heritage, landscape and the wider environment, with appropriate mitigation measures proposed to avoid and reduce potential environmental effects.
WCCDP CA01 Climate Action and Adaptation	It is an objective of the Waterford City & County Council to:	The Proposed Project supports the objectives of WCCDP CA01 by contributing to climate action and the transition towards a low-carbon

Policy	Relevant requirement	Proposed Project response
	a) <i>To support and implement the policies of the Waterford Climate Adaptation Strategy in collaboration with Waterford Climate Action Team the Climate Action Regional Office (CARO), and review/replace the strategy pursuant to the provisions of the Climate Action Plan 2021 and Low Carbon Development Act. We will vary the Development Plan as necessary following the review/ replacement of the strategy.</i>	energy system. The generation of renewable electricity will reduce reliance on fossil-fuel-based generation and contribute to increased renewable energy capacity.
WCCDP UTL 01 New Development and WCCDP Strategic Development Growth Areas	<i>Ensure that new development across the urban and rural settlements of Waterford is infrastructure led in a manner which:</i> <i>Supports communities and economic growth and development,</i> <i>Enhances environmental quality,</i> <i>Complies with the tiered approach to land use zoning which underpins the Development Plan.</i> <i>Encourages and provides opportunities to improve and implement sustainable modes of travel.</i> <i>Integrates nature-based solutions and climate change considerations into the design, planning, and implementation of infrastructure provision/ works and development proposals.</i> <i>Incorporates green infrastructure to provide for carbon offset and carbon sinks and wider environmental benefits, including providing shade to alleviate heat stress, supporting urban biodiversity, water retention and flood alleviation.</i> <i>Promotes and integrates energy efficiency and low carbon technologies and solutions; and,</i> <i>Ensures sufficient heat density (e.g. compact growth) and diversity of connected heat loads (egg hospital, leisure centre, large retail, electricity production, industry) to facilitate the economic provision, viability and</i>	The Proposed Project is consistent with this policy objective through the provision of renewable energy infrastructure which supports the sustainable economic development of Waterford and the transition to a low-carbon energy system. The development has been designed having regard to environmental and climate considerations, including the protection of environmental quality, incorporation of appropriate nature-based solutions and sustainable infrastructure provision. The generation of renewable electricity will further support energy efficiency and the increased use of low-carbon technologies within the County.

Policy	Relevant requirement	Proposed Project response
	<i>integration/ implementation of low carbon heating technologies in development proposals</i>	
WCCDP UTL 13 - Utility, Energy & Communication Policy Objectives	Renewable Energy <i>It is an objective of the Waterford City & County Council to:</i> <i>To promote and facilitate a culture of adopting energy efficiency/ renewable energy technologies and energy conservation and seek to reduce dependency on fossil fuels thereby enhancing the environmental, social and economic benefits to Waterford City and County. It must also be recognised that other sources of electricity generation such as natural gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand."</i> <i>Supporting the delivery of renewable energy to achieve the targets identified in Table 6.3 of the Development Plan.</i> <i>Facilitating and encouraging, where appropriate, proposals for renewable energy generation, transmission and distribution and ancillary support infrastructure facilities including the necessary infrastructure required for the development of offshore renewable energy developments developed fully in accordance with the Waterford Renewable Energy Strategy, the wind energy designation map (Appendix 2 of the RES), the Waterford Landscape and Seascape Character Assessment undertaken to inform this Development Plan, and the National Wind Energy Guidelines, or any subsequent update/ review of these</i> <i>The Council recognizes and supports the role that the County can play in facilitating the onshore infrastructure required for the construction, operation</i>	The Proposed Wind Farm is located within a Preferred Area for wind energy development, with the Proposed Grid Connection providing connection to existing transmission infrastructure. The Proposed Project has been designed and assessed having regard to reasonable alternatives, landscape and environmental effects, consultation and decommissioning, as detailed in the relevant reports and plans.

Policy	Relevant requirement	Proposed Project response
	<i>and maintenance of offshore wind farm developments. This infrastructure includes but is not limited to: construction facilities, storage and lay-down areas, cable landfalls, onshore cable routing to substations, port and harbour infrastructure and coastal operations and maintenance bases, as well as use, reuse or repowering of existing infrastructure where appropriate.</i> • <i>The Wind Energy Designation Map and the Landscape and Seascape Character Assessment Map identify different landscape character areas and associated landscape sensitivities. These designations encompass the concept of buffers between areas of sensitivity which vary across the different landscape character types and their different locations. These buffers allow for a gradual change between contrasting landscape sensitivities and associated wind energy designations to be considered, as necessary, when determining any development proposal.</i> • <i>Promote and encourage the use of renewable energy, and low carbon resources, namely solar photovoltaic, geothermal, heat pumps, district heating, solar thermal, hydro, tidal power, offshore and onshore wind, biomass as well as micro-generation among business, agriculture, education, health, and other sectors.</i> • <i>Promoting, encouraging, ensuring, and facilitating community engagement, participation and implementation of/ in renewable energy projects.</i> • <i>Implementing, including in the Council's own activities and in the provision of services/ works, the use and integration of low carbon, renewable energy infrastructure and technologies.</i> • <i>Supporting appropriate options for, and provision of, low carbon and renewable energy technologies and facilities, including the development and provision of district heating (and/ or other low carbon heating technologies); anaerobic digestion and the extraction of energy and other resources from sewerage sludge.</i> • <i>The preparation and implementation of a Climate Action Plan (including adaptation and mitigation measures) for Waterford.</i>	

Policy	Relevant requirement	Proposed Project response
	To support in conjunction with other relevant agencies, wind energy initiatives, both onshore and offshore, and wave energy, and onshore grid connections and reinforcements to facilitate offshore renewable energy development when these are undertaken in an environmentally acceptable manner. At initial design stage full consideration should be to reasonable alternatives and existing infrastructural assets. In this regard environmental assessments should address reasonable alternatives for the location of new energy developments, and where existing infrastructural assets such as sub-stations, power lines and roads already exist within proposed development areas, then such assets should be considered for sustainable use by the proposed development where the assets have capacity to absorb the new development. All planning applications for Renewable Energy Projects such as wind farms and solar farms shall be accompanied by a Decommissioning and Restoration Plan (DRP) consistent with the Wind Energy Guidelines 2006 or any update thereof. Issues to be addressed shall include details of proposed restorative measures, the removal of above ground structures and equipment, the restoration of habitats, landscaping and/or reseeded roads etc.	
WCCDP UTL 14 - Utility, Energy & Communication Policy Objectives	Energy-Developments and Human Health Energy Developments & Human Health Proposals for energy development should demonstrate that human health has been considered, including those relating to the topics of: Noise (including consistency with the World Health Organisation's 2018 Environmental Noise Guidelines for the European Region developments must comply with the Wind Energy Development Guidelines (2006), or any subsequent update/review of these),	The Proposed project has been designed and assessed having regard to potential impacts on human health and residential amenity arising from the development. In particular, the assessment considers matters including noise, shadow flicker, ground conditions, geology, air quality and water quality, with appropriate mitigation measures incorporated where required. On this basis, the development is considered capable of operating without

Policy	Relevant requirement	Proposed Project response
	- Shadow Flicker (for wind turbine developments, including detailed Shadow Flicker Study), - Ground Conditions/Geology (including landslide and slope stability risk assessment), - Air Quality; and, - Water Quality.	significant adverse effects on human health or the surrounding environment.
WCCDP UTL 19 - Utility, Energy & Communication Policy Objectives	Undergrounding Cables Where undergrounding of cables is being pursued, proposals should demonstrate that environmental impacts including the following are minimised: - Habitat loss as a result of removal of field boundaries and hedgerows (right of way preparation) followed by topsoil stripping (to ensure machinery does not destroy soil structure and drainage properties). - Short to medium term impacts on the landscape where, for example, hedgerows are encountered. - Impacts on underground archaeology. - Impacts on soil structure and drainage; and - Impacts on surface waters as a result of sedimentation.	The Proposed Project supports WCCDP UTL 19 through the undergrounding of electrical cabling where appropriate. The cable route and associated works have been designed to minimise potential effects on habitats and hedgerows, landscape, archaeology, soils and drainage, and surface waters. Appropriate mitigation measures will be implemented during construction to minimise disturbance and prevent sedimentation and other potential environmental effects.
WCCDP UTL21 - Utility, Energy & Communication Policy Objectives	Construction and Environmental Management Plan Construction Environment Management Plans shall be prepared in advance of the construction of relevant projects and implemented throughout. Such plans shall incorporate relevant mitigation measures which have been integrated into the Plan and any lower tier Environmental Impact Statement or Appropriate Assessment.	A Construction and Environmental Management Plan (CEMP) has been prepared and will be implemented for the construction phase of the Proposed Project. The CEMP will incorporate the relevant mitigation and environmental protection measures identified through the environmental assessment process

Policy	Relevant requirement	Proposed Project response
		and will provide a framework for their effective implementation throughout construction.
WCCDP UTL22 - Utility, Energy & Communication Policy Objectives	Construction Wastes <i>We will safeguard the environment by seeking to ensure that residual waste is disposed of appropriately. All waste arising during construction will be managed and disposed of in a way that ensures the provisions of the Waste Management Acts and the Southern Waste Management Plan 2015-2021.</i>	The Proposed Project is aligned with this policy through the management of construction waste in accordance with applicable waste management legislation and relevant waste management requirements. Waste arising during construction will be appropriately segregated, stored, reused or recycled where practicable, with residual waste disposed of at suitably authorised facilities.
WCCDP UTL 24- Utility, Energy & Communication Policy Objectives	Electricity Infrastructure <i>Subject to appropriate environmental assessment and compliance with the policy objectives and development management standards of the development plan, support and facilitate the development of a safe, secure and reliable supply of electricity, associated electricity networks and transmission infrastructure to serve existing and future demand.</i>	The Proposed Project will provide 145.2 MW of renewable electricity generation, supported by the infrastructure required to connect the development to the national grid. The Proposed Project will therefore increase indigenous renewable generation and support a safe, secure and reliable electricity supply.
WCCDP L01 – Landscape	National Landscape Strategy <i>We will support provisions of the 2014 National Landscape Strategy and provide for the sustainable management of all of County Waterford’s landscapes including archaeological landscapes, waterway corridors, coastal, upland, rural and peri-urban landscapes.</i>	The Proposed Project has been designed in accordance with WCCDP L02. A Landscape and Visual Impact Assessment (LVIA) has been prepared to assess the potential effects of the Proposed Project on landscape character and visual amenity. The assessment has been undertaken having regard to the landscape policies, objectives and landscape character designations of the WCCDP and has informed

Policy	Relevant requirement	Proposed Project response
		the siting and design of the Proposed Project to minimise potential landscape and visual effects and ensure alignment with local landscape policy.
WCCDP L02 – Landscape	Protecting our Landscape and Seascape <i>We will protect the landscape and natural assets of the County by ensuring that proposed developments do not detrimentally impact on the character, integrity, distinctiveness or scenic value of their area and ensuring that such proposals are not unduly visually obtrusive in the landscape, in particular, in or adjacent to the uplands, along river corridors, coastal or other distinctive landscape character units.</i>	The Proposed Project has been assessed in the context of the existing landscape character, visual amenity and sensitivity of the receiving environment. The layout, turbine locations and associated infrastructure have been developed to minimise potential landscape and visual effects, while the accompanying landscape and visual assessment identifies the likely effects of the proposal and appropriate mitigation measures. The development is therefore considered to have had due regard to the protection of Waterford's landscape character and visual amenity.
WCCDP L03- Landscape	Landscape and Seascape Character Assessment <i>We will assess all proposals for development outside of our settlements in terms of the 2020 Landscape and Seascape Character Assessment (Appendix 8) and the associated</i>	The Proposed Project has been designed and assessed having regard to the existing landscape character and visual amenity of the receiving environment. The siting and layout of

Policy	Relevant requirement	Proposed Project response
	<i>sensitivity of the particular location. We will require a Landscape and Visual Impact Assessment (LVIA) for proposed developments with the potential to impact on significant landscape features within the City and County. Proposals for significant development (e.g. renewable energy projects, telecommunications and other infrastructure and the extractive industry) shall be accompanied by a LVIA which includes Zones of Theoretical Visibility (ZTV) which indicate the landscape impact zone within which the proposed development may be seen. There will be a presumption against developments which are located on elevated and exposed sites and where the landscape cannot accommodate such development with reasonable and appropriate mitigation.</i>	the turbines and associated infrastructure seek to minimise potential landscape and visual effects, while the LVIA considers the sensitivity and character of the surrounding landscape, key views and visual receptors. Appropriate mitigation measures will be incorporated where required to reduce potential effects, and the development is therefore considered to be consistent with the objectives of WCCDP L03.
WCCDP L 04- Landscape	Scenic Routes and Protected Views <i>We will protect the scenic routes and specified protected views identified in our Landscape Character Assessment (Appendix 8), including views to and from the sea, rivers, landscape features, mountains, landmark structures and urban settlements from inappropriate development that by virtue of design, scale, character or cumulative impact would block or detract from such views.</i>	The Proposed Project is consistent with this policy. A LVIA has been prepared having regard to the scenic routes and protected views identified in the WCCDP and its Landscape Character Assessment. The assessment considers the potential landscape, visual and cumulative effects of the Proposed Project and has informed the siting and design of the development to minimise potential effects on identified scenic routes, protected views and sensitive landscape features.
WCCDP BD 03 - Biodiversity	<i>All proposed development will be considered in terms of compliance with the standards and legal requirements of the following where they apply;</i> <i>Appropriate Assessment of Plans and Projects in Ireland-Guidance for Planning Authorities Department of Housing, Local Government and Heritage (2021).</i>	The Proposed Project has been designed and assessed having regard to the protection of biodiversity and the ecological characteristics of the receiving environment. Potential effects on habitats, flora and fauna, including protected and sensitive species, have been considered

Policy	Relevant requirement	Proposed Project response
	• <i>NRA Guidelines on Ecological Impact Assessment (2009)</i> • <i>All-Ireland Pollinator Plan (2021)</i> • <i>Planning for Watercourses in the Urban Environment (2020)</i> • <i>Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites.</i>	through the ecological assessment process, with appropriate avoidance, mitigation and, where required, enhancement measures incorporated into the Proposed Project. The development therefore seeks to ensure that significant adverse effects on biodiversity are avoided and is considered consistent with the objectives of WCCDP BD03.
WCCDP BD 04 - Biodiversity	Appropriate Assessment <i>All projects and plans arising from this Plan will be screened for the need to undertake Appropriate Assessment under Article 6 of the Habitats Directive. A plan or project will only be authorised after the competent authority has ascertained, based on scientific evidence, Screening for Appropriate Assessment, and subsequent Appropriate Assessment where necessary, that:</i> <i>1. The plan or project will not give rise to significant direct, indirect or secondary effects on the conservation objectives of any European site (either individually or in combination with other plans or projects); or</i> <i>2. The plan or project will have significant adverse effects on the integrity of any European site (that does not host a priority natural habitat type/and or a priority species) but there are no alternative solutions and the plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of Natura 2000; or</i>	The Proposed Project has been designed and assessed having regard to the protection of European sites and their conservation objectives. A Screening for Appropriate Assessment has been undertaken, accompanied by a Natura Impact Statement (NIS) assessing the potential effects on European sites, including in-combination effects. The Proposed Project is therefore considered consistent with the Appropriate Assessment requirements of the WCCDP.

Policy	Relevant requirement	Proposed Project response
	3. <i>The plan or project will have an adverse effect on the integrity of any European site (that hosts a natural habitat type and/or a priority species) but there are no alternative solutions and the plan or project must nevertheless be carried out for imperative reasons for overriding public interest, restricted to reasons of human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of Natura 2000.</i>	
WCCDP BD 05- Biodiversity	Protection of European Sites <i>Projects giving rise to adverse effects on the integrity of European sites (cumulatively, directly or indirectly) arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall not be permitted except as provided for in Article 6(4) of the Habitats Directive, viz. There must be a) no alternative solution available, b) imperative reasons of overriding public interest for the project to proceed; and c) Adequate compensatory measures in place.</i>	The EIAR and NIS demonstrate that the Proposed Project will not result in significant adverse effects on the environment or adversely affect the integrity of any European Site.
WCCDP BD 07 - BD 09 Biodiversity	BD 07: <i>We will protect plant and animal species and habitats which have been identified by the EU Habitats Directive (1997), EU Bird Directive (1979), Wildlife Act (1976) and Wildlife (Amendment) Act 2000 and the Flora Protection Order (2015) and</i>	The NIS, biodiversity and ornithology assessments and Biodiversity Management and Enhancement Plan address these matters. The enhancement measures include riparian,

Policy	Relevant requirement	Proposed Project response
	<i>ensure development does not impact adversely on wildlife species or the integrity and habitat value of the site.</i> BD 08: <i>We will assess all proposed developments at each level of the Development Planning process from City & County Development Plan, Local Area Plan to project level to determine potential for significant effects on the conservation objectives and /or adverse impact on the integrity of the Natura 2000 network and ensure that the requirements of Articles 6(3) and 6(4) of the Habitats Directive are fully satisfied.</i> BD 09: <i>We will ensure a sufficient level of information is provided in development applications to enable a fully informed assessment of impacts on biodiversity to be made. Ecological impact assessments submitted in support of development proposals shall be carried out by appropriately qualified professionals and ecological survey work carried out at optimal survey time to ensure accurate collation of ecological data.</i>	broadleaf woodland and hedgerow planting and enhancement.
WCCDP BD 23 - BD Trees & Woodlands Policy Objectives	Trees & Woodlands Policy Objectives <i>Where development proposals require felling of mature trees a comprehensive tree survey carried out by a suitably qualified arborist shall be submitted assessing the condition, ecological and amenity value of the treestock proposed for removal and mitigation planting and management scheme. We will seek in all cases to ensure when undertaking development or when permitting development that the loss of or damage to existing trees is minimised.</i>	The Proposed Project has been designed to minimise the loss of and potential damage to existing trees and vegetation. Appropriate avoidance and mitigation measures have been incorporated into the project design and will be implemented throughout the EIAR, including measures to protect retained trees and vegetation during construction and appropriate reinstatement and planting where required.

Policy	Relevant requirement	Proposed Project response
WCCDP WQ 01 – Water Policy Objectives	Water Framework Directive and Associated Legislation <i>We will contribute towards, as appropriate, the protection of existing and potential water resources, and their use by humans and wildlife, including rivers, streams, wetlands, the coastline, groundwater and associated habitats and species in accordance with the requirements and guidance in the EU Water Framework Directive 2000 (2000/60/EC), the European Union (Water Policy) Regulations 2003 (as amended), the European Communities Environmental Objectives (Surface Waters) Regulations 2009 (as amended), the Groundwater Directive 2006/118/EC and the European Communities Environmental Objectives (groundwater) Regulations 2010 (as amended) and other relevant EU Directives, including associated national legislation and policy guidance (including any superseding versions of same). To support the application and implementation of a catchment planning and management approach to development and conservation, including the implementation of Sustainable Drainage System techniques for new development.</i>	The hydrology and hydrogeology assessment, Water Framework Directive assessment, drainage design and construction controls address potential effects from foundations, roads, crossings, felling and grid works.
WCCDP WQ 02 – Water Policy Objectives	Achieving High/ Good Water Quality Status <i>In order to maintain water quality at high status and a return to good status for rivers that are not meeting this threshold at present we will:</i> <i>• Provide for the efficient and sustainable use and development of water resources and water services infrastructure.</i> <i>• Manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment.</i> <i>• Ensure that all development does not negatively impact on water quality and quantity, including surface water, ground water, designated source protection areas, river corridors and associated wetlands, estuarine waters, coastal and transitional waters.</i>	The hydrology and hydrogeology assessment, Water Framework Directive assessment, drainage design and construction controls demonstrate that the Proposed Project has been designed to protect water quality and avoid adverse effects on surface water and groundwater. Appropriate mitigation measures address potential water quality effects associated with turbine foundations, access roads, watercourse crossings, forestry felling and grid connection works, including the control of sediment, runoff and potential pollutants during construction.

Policy	Relevant requirement	Proposed Project response
	• <i>Ensure new development complies with the relevant EPA Code of Practice: Domestic Wastewater Treatment Systems (PE ≤ 10) (2021) or any amendments thereto.</i> • <i>Screen planning applications according to their Water Framework Directive status and have regard to their status and objectives to achieve ‘good’ status or protect and improve ‘high or good status’. A catchment-based approach shall be applied to the assessment of planning applications which may impact on water quality, and to ensure that the development would not result in a reduction in the water quality status of a waterbody in that catchment.</i> • <i>Seek to protect, enhance and restore all groundwaters and ensure a balance of abstraction and recharge, with the aim of achieving good groundwater status and to reverse any significant and sustained upward trends in the concentration of pollutants in groundwater.</i> • <i>Work with the Local Authority Waters Programme and other relevant State agencies and local communities to achieve the objectives for the Areas for Action1 identified in the River Basin Management Plans 2018-2021 and 2022-2027 to ensure that new development do not result in a deterioration of water quality in these areas.</i> • <i>Develop the associated Blue Dot Catchment network programme under the River Basin Management Plan 2018-2021 to protect and maintain the excellent quality of ‘High’ status water bodies.</i>	
WCCDP WQ 03 – Water Policy Objectives	River Basin Management Plan <i>Support the implementation of the relevant recommendations and measures as outlined in the River Basin Management Plan 2018-2021, and associated Program of Measures, or any such plan that may supersede same during the lifetime of the plan. Proposed plans, program and projects shall not have an unacceptable impact on the water environment, including surface waters, groundwater quality and quantity, river corridors and associated woodlands. Also, to have cognisance of, where relevant, the EU’s Common Implementation Strategy Guidance Document No. 20 and 36 which</i>	The Proposed Project has been designed and assessed to protect surface water and groundwater quality and maintain the objectives of the Water Framework Directive and River Basin Management Plan. The hydrology and hydrogeology assessment, Water Framework Directive assessment, drainage design and construction controls address potential effects associated with

Policy	Relevant requirement	Proposed Project response
	<i>provide guidance on exemptions to the environmental objectives of the Water Framework Directive.</i>	foundations, access roads, watercourse crossings, forestry felling and grid connection works. Appropriate mitigation measures will control sediment, runoff and potential pollutants, ensuring the protection of the receiving water environment and water quality.
WCCDP ENV 01 - Regulatory Framework and Decision-Making Policy Objectives	<i>Through implementation of the Development Plan we will cumulatively contribute towards – in combination with other users and bodies – the achievement of the objectives of the regulatory framework for environmental protection and management, including compliance with EU Directives - including the Habitats Directive (92/43/EEC, as amended), the Water Framework Directive(2000/60/EC), the Birds Directive (2009/147/EC), the Environmental Impact Assessment Directive (2011/92/EU, as amended by 2014/52/EC) and the Strategic Environmental Assessment Directive (2001/42/EC) – and relevant transposing Regulations.</i>	The Proposed Project has been designed and assessed having regard to the applicable EU environmental protection framework. The EIAR, NIS and Water Framework Directive assessment address the requirements of the EIA, Habitats, Birds and Water Framework Directives, with appropriate avoidance and mitigation measures incorporated to ensure the protection of biodiversity, European Sites and the water environment.
WCCDP ENV 02 - Regulatory Framework and Decision-Making Policy Objectives	<i>Lower levels of decision making, and environmental assessment shall consider the sensitivities identified in the SEA Environmental Report that accompanies the Plan, including the following:</i> <i>Special Areas of Conservation and Special Protection Areas.</i> <i>Features of the landscape that provide linkages/connectivity to designated sites (e.g. watercourses, areas of semi-natural habitat such as linear woodlands etc).</i> <i>Natural Heritage Areas and proposed Natural Heritage Areas.</i>	The Proposed Project has been designed in compliance with WCCDP ENV 02, having regard to the environmental sensitivities identified in the Development Plan and associated SEA Environmental Report. The EIAR and NIS assess potential effects on European Sites, designated habitats, ecological connectivity, cultural heritage, protected structures and landscape and visual amenity,

Policy	Relevant requirement	Proposed Project response
	• <i>Areas likely to contain a habitat listed in Annex 1 of the Habitats Directive.</i> • <i>Entries to the Record of Monuments.</i> • <i>Entries to the Record of Protected Structures.</i> • <i>Architectural Conservation Areas; and,</i> • <i>Landscape/amenity designations.</i>	with appropriate avoidance and mitigation measures incorporated into the design of the Proposed Project.
WCCDP ENV 04 - Environmental Quality Policy Objectives	Air and Energy <i>We will contribute towards compliance with air quality legislation; greenhouse gas emission targets; management of noise levels; and reductions in energy usage.</i>	The Proposed Project supports compliance with air quality legislation through the generation of renewable electricity, supporting reductions in greenhouse gas emissions and the transition to a low-carbon energy system. An Air Quality Assessment has been undertaken as part of the EIAR, alongside assessment of noise and climate effects, with appropriate mitigation measures incorporated to minimise potential effects during construction and operation.
WCCDP ENV 06 - Environmental Quality Policy Objectives	Human Health <i>Assess proposals for development in terms of; inter alia, potential impact on existing adjacent developments, existing land uses and/or the surrounding landscape. Where proposed developments would be likely to have a significant adverse effect on the amenities of the area through pollution by noise, fumes, odours, dust, grit or vibration, or cause pollution of air, water and/or soil, mitigation measures shall be introduced in order to eliminate adverse environmental impacts or reduce them to an acceptable operating level.</i>	The Proposed Project has been assessed having regard to the protection of human health and residential amenity. A dedicated Population and Human Health assessment has been undertaken as part of the EIAR, supported by assessments of noise, air quality, water, soils and other relevant environmental factors. Appropriate mitigation measures have been incorporated to avoid or minimise potential effects during construction and operation.

Policy	Relevant requirement	Proposed Project response
WCCDP Volume 2 Section 5.24 – Renewable Energy Developments	<i>All applications for wind energy developments should be compatible with the 2006 Wind Energy Development Guidelines issued by the DoEHLG (or any updated revision of same), the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017), and the Waterford Renewable Energy Strategy (Appendix 7 of the Development Plan and in particular the wind energy designation map contained within the Strategy (Appendix 2 refers)) and the renewable energy targets set out in Table 6.3 of the Development Plan, while regard should also be had to the Waterford Landscape and Seascape Character Assessment (Appendix 8 of the Development Plan).</i>	The application assesses the Proposed Project against the Guidelines (DoEHLG, 2006) and has regard to Draft Guidelines (DoHPLG, 2019). It addresses noise, shadow flicker, landscape, ecology, heritage, aviation, grid infrastructure and community engagement.
WCCDP Waterford Renewable Energy Strategy 2016-2030 and Appendix 7	Identifies Exclusion Areas, Open for Consideration Areas and Preferred Areas for large-scale commercial wind-energy development. The designation is one part of the site-specific planning assessment. <i>The strategic aims of the Renewable Energy Strategy are;</i> <i>To ensure that between now and 2030, there is a steady, progressive and measurable increase in the amount of renewable energy used in the electricity, heat and transport sectors in Waterford, commensurate with the achievement of the national target.</i> <i>To identify opportunities for various renewable energy technologies and resources applicable to Waterford.</i> <i>To maximise the opportunities for renewable energy development whilst safeguarding the environment and other amenities, subject to Strategic Environmental Assessment and Habitats Directive Assessment requirements.</i>	The Proposed Wind Farm site is identified as a Preferred Area, as shown on Figure 1. This provides positive locational support for the Proposed Wind Farm,, subject to the detailed environmental, landscape, amenity and development-management criteria.

Policy	Relevant requirement	Proposed Project response
WCCDP AH 01 - Archaeological Heritage	National Monuments Act <i>It is the policy of the Council to protect, and enhance in an appropriate manner all elements of the archaeological heritage including the following categories:</i> <i>a) Sites and monuments included in the Sites and Monuments Record as maintained by the Department with responsibility for the protection of Ireland’s archaeological heritage. b) Monuments and places included in the Record of Monuments and Places (RMP) as established under the National Monuments Acts.</i> <i>c) Historic monuments and archaeological areas included in the Register of Historic Monuments as established under the National Monuments Acts.</i> <i>d) National Monuments subject to Preservation Orders under the National Monuments Acts and National Monuments which are in the ownership or guardianship of the Minister with responsibility for archaeological heritage or the Local Authority.</i> <i>e) Archaeological objects within the meaning of the National Monuments Acts.</i> <i>f) Wrecks protected under the National Monuments Acts or otherwise included in the Shipwreck Inventory maintained by the National Monuments Service, underwater archaeology, riverine, coastal or lacustrine locations.</i> <i>g) Archaeological features not as yet identified but which may be impacted on by development.</i> <i>And where feasible, appropriate and applicable to promote access (including disabled access) to and signposting and interpretive material of such sites and monuments and provide appropriate forms of virtual access where physical access is not possible.</i>	The cultural-heritage assessment undertaken as part of the EIAR considers direct, indirect, setting and cumulative effects and identifies the avoidance, investigation, monitoring and preservation measures to be implemented in relation to the Proposed Project.

Policy	Relevant requirement	Proposed Project response
WCCDP AH 02 - Archaeological Heritage	Managing Development <i>We will contribute, as appropriate, towards the protection and sympathetic enhancement of archaeological heritage, in particular by implementing the relevant provisions of the Planning and Development Act 2000 (as amended) and the National Monuments Act, 1930 (as amended). We will ensure that archaeological excavation is carried out according to best practice as outlined by the National Monuments Service, Department of Housing, Local Government and Heritage, the National Museum of Ireland and the Institute of Archaeologists of Ireland. We will consult with the National Monuments Service as relevant in relation to proposed developments, including those adjoining archaeological sites.</i>	The Proposed Project aligns with this policy through the preparation of a Cultural Heritage assessment as part of the EIAR, including consideration of recorded monuments and potential previously unrecorded archaeological features. Appropriate avoidance, mitigation and archaeological monitoring measures have been incorporated, where required, in accordance with relevant legislation and best practice guidance.
WCCDP AH 03 - Archaeological Heritage	Preservation of Archaeological Material <i>Waterford City & County Council shall, in an appropriate manner, secure either by preservation insitu or preservation-by-record, the archaeological heritage. In this regard priority shall be given to the preservation in-situ of any archaeological monument/site/place as the first option considered. If preservation in-situ cannot be achieved, or can only be achieved in-part, then preservation by-record of elements of the archaeological heritage will be required –this will require the full archaeological excavation and recording of the monument/site, according to best professional practice. Where excavation is required this shall also include the preparation of appropriate reports, post-excavation analyses and publications. The costs of assessing</i>	The Cultural Heritage assessment within the EIAR prioritises preservation in situ, with appropriate mitigation, including preservation by record and archaeological monitoring, where required.

Policy	Relevant requirement	Proposed Project response
	<i>and mitigating archaeological impacts shall form part of development costs as borne by the developer.</i>	
WCCDP AH 04 - Archaeological Heritage	Archaeological Impact Considerations <i>It is the policy of the Council to:</i> <i>Ensure that development in the vicinity of a site of archaeological interest shall be designed and sited sympathetically and shall not be detrimental to the character of the archaeological site or its setting by reason of its location, scale, bulk or detailing.</i> <i>When considering development in the vicinity of all archaeological sites including remnants of the city and town walls, the planning authority will require the preparation of an archaeological assessment detailing the potential impact of any development on upstanding structures, buried structures and deposits. The report will also include a visual impact assessment to ensure adequate consideration of any potential visual impact the proposed development may have on any upstanding remains.</i> <i>Proposed developments will be required to retain the existing street layout, including laneways, historic building lines and traditional plot widths where these derive from medieval or earlier origins.</i> <i>When considering development in the vicinity of upstanding archaeological/historical monuments, to aim to achieve a satisfactory buffer area between the development and the monument in order to ensure the preservation and enhancement of the amenity associated with the presence of upstanding monuments within the historic urban pattern.</i> <i>For all developments, which have potential to impact on riverine, intertidal and sub-tidal environments to require an archaeological assessment prior to works being carried out. In addition to planning permission, development</i>	The cultural-heritage assessment considers direct, indirect, setting and cumulative effects and identifies the avoidance, investigation, monitoring and preservation measures to be implemented in relation to the Proposed Project.

Policy	Relevant requirement	Proposed Project response
	<i>works at National Monuments of which the Minister or local authority is owner of, guardian of or in respect of which a preservation order is in force, may also require Ministerial Consent under Section 14 of the National Monuments Act 1930 (as amended) and this will be determined by the relevant authority (Department of Housing, Local Government & Heritage) on application.</i>	
WCC Climate Action Plan 2024-2029	4.4.2 <i>To reduce Waterford City and County Council's greenhouse gas emissions by reducing reliance on fossil fuels through increased energy efficiency, a move to active and public transport, deployment of renewable energy technologies and influencing behavioral change internally and externally.</i> 5.2 <i>Waterford City will be Ireland's first low-carbon city, providing both residents and businesses with sustainable, innovative solutions when it comes to energy efficiency, renewable energy, transport and the effective use of resources to eliminate waste.</i>	The Proposed Project is consistent with these objectives through the generation of renewable electricity, reducing reliance on fossil fuels and supporting the transition to a low-carbon economy. The Proposed Project will contribute to increased renewable energy generation and associated reductions in greenhouse gas emissions.

Waterford Renewable Energy Strategy 2016-2030

The Waterford Renewable Energy Strategy 2016-2030 (Waterford RES) examines the renewable energy potential for the city and county and considers the strategic planning factors contributing towards the deployment of such renewable energy. It also highlights the importance of integrating renewable energy and landuse planning. To this end, the Strategy recognises that there is a need to strengthen links between renewable energy and landuse planning through County Development Plans, Strategic Development Zones and other local plans.

The Waterford RES characterises the county into 3 different policy areas aimed at facilitating large scale commercial wind energy developments. These policy areas are based on a number of criteria, including accessibility to the electricity distribution grid, used to identify suitable areas for wind energy developments. The areas and descriptions are set out below.

- > Preferred Areas,
- > Open for Consideration Areas,
- > Exclusion Areas,

While not defined in the WCCDP 2022-2028, 'Preferred areas' were previously defined in WCDP 2011-2017 as:

"Areas which are suitable and should generally be considered for permission unless local circumstances dictate otherwise"

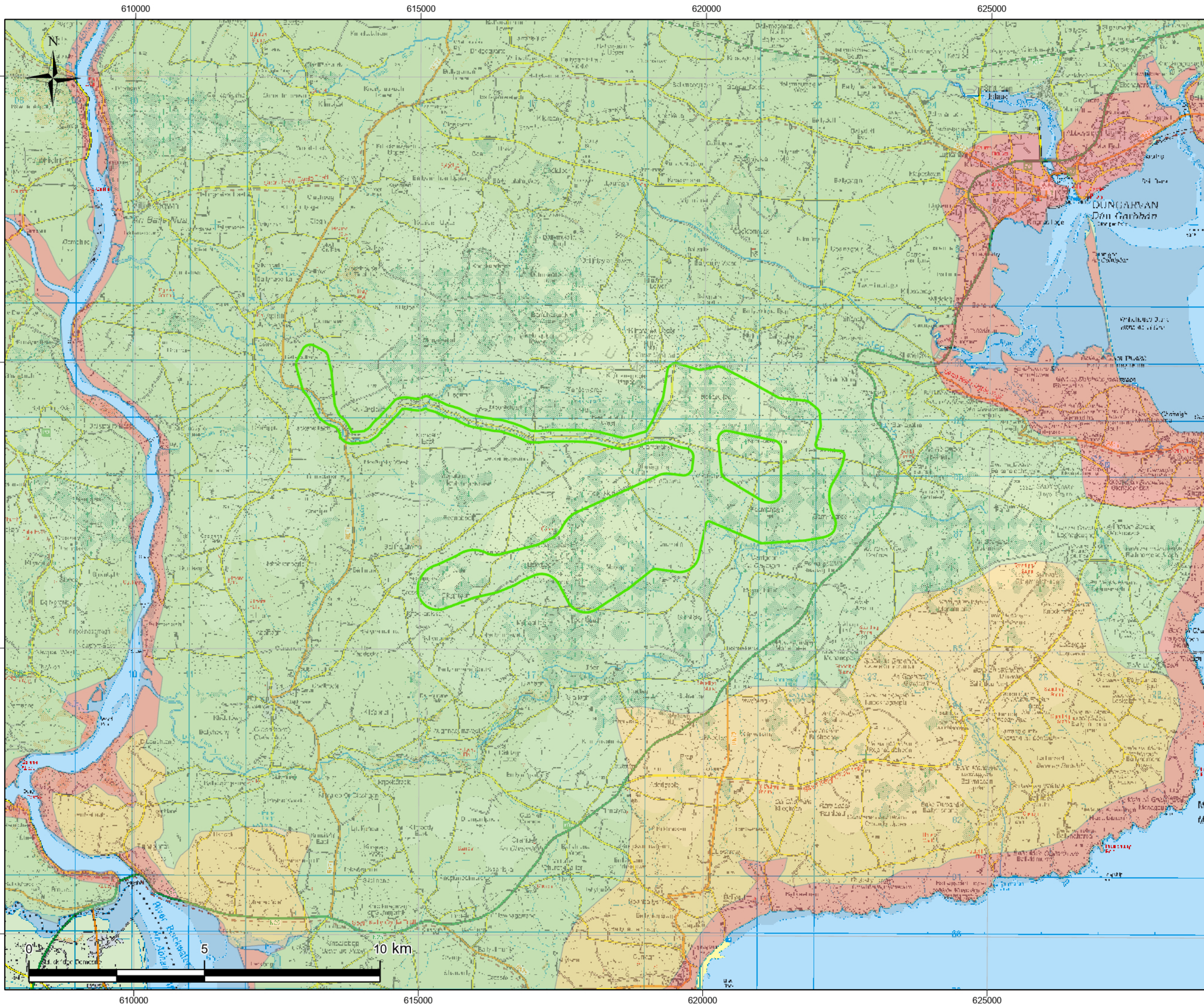
The Proposed Wind Farm is located within a designated 'Preferred Area' for wind energy development, indicating that the site is considered suitable in principle for such development, subject to detailed site-specific assessment and compliance with all relevant planning and environmental requirements. Having regard to the applicable policies and objectives of the WCCDP, the Proposed Wind Farm is considered to accord with the relevant provisions of the Plan and to represent appropriate and sustainable development within the area of WCCC, as shown in Figure 2-3.

Waterford City & County Council Climate Action Plan 2024-2029

The Waterford City & County Council Climate Action Plan 2024-2029 (Waterford CAP) sets out to enable solutions at a local level to address climate change. The Climate Action Plan will enable a transition to a low-emission and climate resilient society. The Climate Action Plan identifies strategic objectives, supported by specific actions.

4.4.2 Strategic Goal 2: Built Environment and Transport Objective: To reduce Waterford City and County Council's greenhouse gas emissions by reducing reliance on fossil fuels through increased energy efficiency, a move to active and public transport, deployment of renewable energy technologies and influencing behavioural change internally and externally

The strategic goal outlined above would be significantly aided by the Proposed Project and its potential to connect 145.2MW of renewable electricity to the grid, and as such, the Proposed Project is aligned with the Waterford CAP.



Map Legend

- EIAR Site Boundary
- Waterford Renewable Energy Strategy 2016-2030
 - Exclusion Area
 - Open for Consideration
 - Preferred Area

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

SITE LOCATION - NOT TO SCALE

Drawing Title
Waterford Renewable Energy Strategy 2016-2030

Project Title
Slievegrine Renewable Energy Development

Project No.	Drawing No.	Scale
240740	2-3	1:100,000
SOR	EMC	23/06/2026

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

2.5.5.2 Project Compliance with Local Policy

In summary, the WCCDP and associated Waterford CAP fully recognise the importance of tackling climate change through the increased supply of renewable energy. WCCC 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 Proposed Wind Farm is located in a ‘Preferred Area’, demonstrating the site’s appropriateness for wind energy development, subject to detailed assessment. Accordingly, the Proposed Wind Farm is considered to be compliant with the relevant provisions of the WCCDP and represents proper planning and sustainable development in the functional area of WCCC.

2.5.6 Other Relevant Onshore Wind Energy Planning Policy Publications

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

Wind Energy Development Guidelines 2006

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

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

Draft Wind Energy Development Guidelines 2019

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

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

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

The design of the Proposed Project has taken account of the “preferred draft approach” as articulated by the Department in June 2017, and accordingly, has been developed with the provisions of the Draft Guidelines (DoHPLG, 2019) in mind (for example in relation to 4 times turbine tip height set back distance from third party sensitive receptors) and the inclusion of a standalone community report.

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

At time of writing the Draft Guidelines (DoHPLG, 2019) are not yet finalised and have not been adopted. The relevant wind energy guidelines for the purposes of Section 28 of the Act, as amended, remain those published in 2006, the Guidelines (DoEHLG, 2006). Notwithstanding this, however, due to the timelines associated with the planning process for renewable energy projects it is possible that an updated version of the Draft Guidelines (DoHPLG, 2019) may be finalised during the consideration period for the current planning application for the Proposed Project. To this end, on the basis of the details available from the Draft Guidelines (DoHPLG, 2019) it is anticipated that the Proposed Project will be capable of adhering to the relevant noise and shadow flicker standards. While the final guidelines have not yet been published it should be noted that Shadow Flicker and Noise are entirely controllable and are discussed further in Chapter 5: ‘Population and Human Health’ and Chapter 12: ‘Noise and Vibration’, respectively.

In addition, the Proposed Project maintains a four times tip height set back between turbines and third-party sensitive receptors which is currently the recognised standard for visual amenity purposes, as outlined in the Draft Guidelines (DoHPLG, 2019). Furthermore, comprehensive community consultation has also been undertaken (refer to Appendix 2-2 Community Engagement Report) and detail of the Proposed Project has been provided and assessed as part of this EIAR, forming an integral part of this planning application.

IWEA Best Practice Guidelines for the Irish Wind Energy Industry 2012

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

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

IWEA Best Practice Principles in Community Engagement and Community Commitments 2013

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

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

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

Further details on the community engagement that has been undertaken as part of the Proposed Project are presented below. A Community Engagement Report has been prepared by MKO and is included as Appendix 2-2 to this chapter. This report outlines the steps taken by the Applicant to communicate effectively with the local community in respect of the Proposed Project.

Department Circular PL05/2017

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

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

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

Commission for Regulation of Utilities: Grid Connection Policy

The Commission for Regulation of Utilities (CRU) (previously the Commission for Energy Regulation (CER)) launched a new grid connection policy in March 2018 for renewable and other generators, known as ECP-1, which seeks to allow “shovel ready” projects that already have a valid planning permission, connected to the electricity networks. The principal objective which guides this decision is to allow those projects to have an opportunity to connect to the network, along with laying the foundations for future, more regular batches for connection. August 2018 saw the applicants for new connection capacity under ECP-1 published. ECP-2 was launched in June of 2020, which set policy for at least three annual batches of connection offers (ECP 2.1, ECP-2.2, and ECP-2.3). On 4th April 2023 the CRU published its Decision on ECP-2.4, confirming a fourth batch under the ECP-2 policy. The first four ECP-2 application windows (2.1 -2.3 and -2.4) opened for the month of September each year. The application window for the fifth annual batch (ECP-2.5) closed on the 30th of November 2024. The enduring connection policy regime replaces the previous ‘Gate’ system of grid connection applications. The grid connection application window under ECP-1 was the first time since 2007 that certain renewable energy projects including wind farms had an opportunity to secure a new grid connection offer.

The design of the proposed underground electrical cabling for the Proposed Project has taken account of the “*preferred draft approach*” and accordingly, has been developed with the provisions of the Draft Guidelines (DoHPLG, 2019) in mind. This grid connection policy will allow for the Proposed Project, once it is permitted, to connect to the electricity networks under the enduring connection policy regime.

Renewable Energy Support Scheme

CAP 25 is the Government’s plan to give Irish people a cleaner, safer and more sustainable future to halve emissions by 2030 and reach net zero no later than 2050. The Plan sets out actions across every sector which will ensure we meet our future climate commitments. A key part of the CAP 25 is to increase the proportion of renewable electricity to up to 80% by 2030, with a target of 9GW from onshore wind. These measures will be driven by introduction of the Renewable Electricity Support Scheme (‘RESS’) which aims to promote the generation of electricity from renewable sources.

The RESS is an auction-based scheme which invites renewable electricity projects to bid for capacity and receive a guaranteed price for the electricity they generate.

RESS 1 was the first Renewable Electricity Support Scheme run by the Government of Ireland and concluded in 2020. RESS 2 was run in 2022 and concluded in June 2022. The successful projects in RESS 2 represent a potential increase of nearly 20% in Ireland’s current renewable energy generation capacity. They will be delivered between 2023 and 2025. A public consultation was opened in 2022 to refine the Terms and Conditions developed for RESS 2 with a limited and specific set of changes for RESS 3. This consultation closed in December 2022. RESS 3 auction was run in 2023 and concluded in September 2023. The RESS 4 auction concluded in August 2024, successfully procured approximately 2,071 GWh of renewable electricity, equivalent to around 1,300 MW of new capacity, largely from solar PV and onshore wind projects. The most recent RESS auction was the RESS 5 auction submissions closed in September 2025, and results were announced later the same month. It secured its full target of

around 1,500 GWh of renewable electricity, delivering over 1,000 MW of additional onshore wind and solar capacity.

The RESS ensures that we are on a pathway to meet our ambitious climate targets and lays the foundations of a thriving and cost-effective renewable electricity market. This will support the growth of the green economy, create sustainable work opportunities, and ultimately benefit the consumer as renewables become more cost effective and increase Ireland's energy security.

The Proposed Project is in accordance with the CAP 25 and a grant of permission for the onshore wind energy development will allow for the Proposed Project to participate in the RESS auction and contribute renewable energy generation in achieving Ireland's CAP 25 target of 9GW of onshore wind generation by 2030.

2.6

Planning History

This Section of the EIAR sets out the relevant planning history of the application site and also identifies other wind energy developments within the wider area (25km from the EIAR site boundary).

2.6.1

Planning Applications within the Planning Application Boundary

A planning search was carried out through the WCCC's online planning portal and ACP online planning portal in October 2026 for relevant planning applications lodged within the planning application boundary of the Proposed Project. The planning applications within the red line planning application boundary are outlined in Table 2-3 below.

Table 2-3 Planning applications within the red line planning application boundary

Pl Ref.	Description	Decision
041056	to construct two dwellings, new site entrances, borehole water supplies, septic tanks and percolation areas and ancillary development.	Granted by WCCC on 21/09/2004
071877	to construct a detached garage for domestic use	Granted by WCCC on 29/04/2008
17220	to construct a slatted cubicle shed, silage slab, all ancillary site works	Granted by WCCC on 30/06/2017
21819	Section 254 Licence Application - The erection of overground electronic communications infrastructure and any associated physical infrastructure along public roads including:- 1. The erection of new overground fibre optic cables on existing timber poles 2. The	Granted by WCCC on 02/09/2021

21705	construction of milking parlour complex including decommissioning of existing open tank	Granted by WCCC on 21/10/2021
2228	PERMISSION is sought for (a) change of use of Mountstuart Schoolhouse and detached Outbuilding to Dwelling, (b) to construct single-storey extension linking Schoolhouse and Outbuilding, (c) to use existing vehicular access to serve dwelling and install Wastewater	Granted by WCCC on 22/04/2022
22407/PL93. 314219	Junction & Bend Widening Works comprising road widening at the junction of the L2024 with the L2022 in Carronahyla townland; widening of the junction of the L2022 with the L6077 and widening of two bends along the L6077 in Knocknaglogh Upper townland; and ancillary works. The proposed development will facilitate the delivery of wind turbine blades along the roads from Pulla crossroads on the N25, to Knocknamona Windfarm Site Entrance, at Knocknaglogh Lower on the L6077. This application is accompanied by an Environmental Impact Assessment screening report and an Appropriate Assessment Report (Natura Impact Statement)	Granted by WCCC on 05/07/2022 and upheld by ACP on 07/12/2022
2360289	the construction of a new storey and a half dwelling house and detached garage, along with septic tank and percolation area, entrance driveway and all ancillary works	Granted by WCCC on 10/10/2023
2660517	Construct a new single storey dwelling together with new entrance, bore well, septic tank, percolation area and ancillary site works	Granted by WCCC on 01/09/2026

2.6.2

Wind Energy Developments within 25km of the Site

A planning search was carried out to establish permitted, operational and proposed wind energy developments within 25km of the Proposed Turbines for the purposes of informing the potential cumulative effects (see section 2.9 of this Chapter for further details and Table 2-4 for details on the rationale for this study area). The search was carried out using the relevant local authority, ACP and EIA planning portals in August 2026 for relevant planning applications. In total, 7 no. applications relating to wind energy were identified within 25km of the Proposed Turbines. These are outlined in greater detail in Table 2-4 below.

Table 2-4 Wind Farms within 25km of the Proposed Turbines

Pl. Ref	Applicant	Wind Farm	Description	Decision	Status	Turbines No.	Approx. Distance to Nearest Turbine
WCC Ref: 10/6	Ballycurreen Windfarm Ltd	Ballycurreen Wind Farm	A 5 year Planning permission for development of a windfarm. This development is to comprise of 2 electricity generating wind turbines with a hub height of 79 metres and a rotor diameter of 82 metres, an electrical compound, substation building, three carparking spaces, associated site roads and site works.	Granted	Operational	2	5.92km
WCC Ref: 2660139	Knocknamona Windfarm Limited	Knocknamona Wind Farm	the Development (to be called Knocknamona Windfarm 2026) will consist of the following elements: a) Windfarm of eight (8) wind turbines within an overall tip height of 159m (in the same location and with a 4m higher tip height, than the 8 No. turbines previously authorized in 2022 under reference 309412-21). The turbine rotor diameter size within the range 133m to 138m inclusive; turbine hub height within the range 90m to 92.5m inclusive – all within an overall tip height of 159m. b) Construction of 8 No. turbine foundations and adjacent hard-core crane hardstandings.	Permitted	Permitted	8	2.97km
ACP Ref: PA04.309121	Curns Energy Limited	Lyrenacarriga Wind Farm	Windfarm development and all associated infrastructure.	Permitted	Permitted	17	11.87km

Pl. Ref	Applicant	Wind Farm	Description	Decision	Status	Turbines No.	Approx. Distance to Nearest Turbine
ACP Ref: EA93.324483	Moanbrack Energy Limited	Moanbrack Wind Farm	Request for an Environmental Impact Assessment Report (EIAR) exemption under Section 172(3) of the Planning and Development Act 2000 (as amended)	Proposed	Proposed	2	5.64km
ACP Ref: PA93.321522	Futureenergy Scart Mountain Designated Activity Company	Scart Mountain Wind Farm	for a 10-year permission for the proposed construction of a wind energy development (and all associated infrastructure) at a site located approximately 4 km northeast of Cappoquin and approximately 13 km northwest of Dungarvan, Co. Waterford.	Proposed	Proposed	15	14.04km
WCC Ref: 04/1788, EOD-10175	Hibernian Wind Power Ltd	Woodhouse Wind Farm	for Woodhouse wind energy project. The project will comprise eight wind turbines, access tracks, a fenced Switchyard comprising single-storey Control Building and Substation and anemometer mast. Wind turbines will comprise towers up to 70 metres high, with a diameter of about 4metres at the base. Three blades of up to 42 metres length will be attached. The anemometer mast will be up to 60 metres high. An Environmental Impact Statement accompanies this application	Granted	Operational	8	4.87km

Pl. Ref	Applicant	Wind Farm	Description	Decision	Status	Turbines No.	Approx. Distance to Nearest Turbine
PA93.324420	Dyrick Hill Wind Farm Limited	Dyrick Hill Wind Farm	Construction of Dyrick Hill Windfarm comprising 12 no. wind turbines and related works.	Proposed	Proposed	12	5.7km

2.7 Scoping and Consultation

2.7.1 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 an Environmental Impact Assessment (EIA). This process is conducted by contacting relevant authorities and Non-Governmental Organisations (NGOs) with interest in the specific aspects of the environment with the potential to be affected by the proposal. These organisations are invited to submit comments on the scope of the EIAR and the specific standards of information they require. Comprehensive and timely scoping helps ensure that the EIAR refers to all relevant aspects of the Proposed Project and its potential effects on the environment and provides initial feedback in the early stages of the EIAR preparation, when alterations are still easily incorporated into the design. In this way scoping not only informs the content and scope of the EIAR, but it also provides a feedback mechanism for the proposal design itself.

As part of the constraints mapping process, which is detailed in Chapter 3 of this EIAR, telecommunications operators, were contacted in November 2024 and January 2025 in order to determine the presence of telecommunications links or aviation assets traversing or located in close proximity to the Proposed Wind Farm. Table 2-5 below represents the latest scoping response received from all rounds of telecom scoping undertaken.

Following this initial exercise, an EIAR scoping document, providing details of the Proposed Project, was prepared by MKO and circulated in July 2025. The scoping document provided details of the Proposed Project and set out the scope of work for the EIAR. Consultees were invited to contribute to the 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 EIAR.

A revised scoping exercise was carried out in July 2026 due to time elapsed from when previous scoping was carried out, updates in local and national policy and legislation, updates in relevant EIAR guidance, changes in the environmental baseline and refinement of the Proposed Project layout and design. Consultees were invited to contribute again to the EIAR, following these changes.

2.7.2 Scoping Responses

Table 2-5 lists the responses received from the bodies to the scoping document circulated in July 2025 with a follow up in June 2026. Copies of all scoping responses are included in Appendix 2-1 of this EIAR. If further responses are received, the comments and recommendations of the consultees will be considered in the construction and operation of the Proposed Project, should planning permission be granted. The recommendation of the consultees has informed the project design and scope of assessments undertaken and the contents of the EIAR.

Table 2-5 Scoping List and Responses

Ref	Consultee	July 2025- Initial Scoping	June 2026- Updated Scoping
1	An Taisce	No response received	No response received
2	Bat Conservation Ireland	No response received	No response received
3	Birdwatch Ireland	No response received	No response received

4	Commission for Regulation of Utilities	No response received	No response received
5	Cork Airport	Response received 4 th of July 2025	Not re-consulted; correspondence was redirected to Dublin Airport following Cork Airport's 2025 response.
6	Department of Agriculture, Food and the Marine	No response received	Response received 13 th of August 2026
7	Department of Defence	Response received 16 th of July 2025	Response received 28 th of August 2026
8	Department of Housing, Local Government and Heritage	Acknowledgement received 2 July 2025; substantive DAU response received 10 October 2025	No response received
9	Department of the Environment, Climate and Communications	Response received 15 July 2025 on behalf of Geological Survey Ireland	No response received
10	Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media	No response received	No response received
11	Department of Transport	Response received 22 nd of July 2025	Response received 27 th of August 2026
12	Eirgrid	No response received	No response received
13	Environmental Protection Agency (EPA)	No response received	No response received
14	ESB	Acknowledgement received 2 July 2025; no substantive response identified	No response received
15	Faite Ireland	Response received 18 th of July 2025	Response received 26 th of August 2026
16	Forest Service	No response received	No response received
17	Geological Survey of Ireland (GSI)	Response received 15 July 2025 via the Department of the Environment, Climate and Communications	No response received
18	Gas Networks Ireland (GNI)	Acknowledgement received 1 July 2025; no substantive response identified	No response received

19	Health Service Executive (HSE)	No response received	No response received
20	Irish Aviation Authority (IAA)	Response received 7 th of July 2025	Response received 14 th of August 2026
21	Iarnród Éireann	Response received 1st of July 2025;	No response received
22	Inland Fisheries Ireland (IFI)	No response received	No response received
23	Irish Raptor Study Group (IRSG)	No response received	No response received
24	Irish Wildlife Trust (IWT)	Response received 7 th of July 2025;	No response received
25	Office of Public Works (OPW)	Acknowledgement received 1 July 2025; correspondence forwarded internally; no substantive response identified	No response received
26	Sustainable Energy Authority of Ireland (SEAI)	No response received	No response received
27	Local Authority Waters Programme (LAWPRO)	Acknowledgement received 9 July 2025; substantive response received 23 July 2025	No response received
28	Sport Ireland	No response received	No response received
29	Teagasc	No response received	No response received
30	The Heritage Council	No response received	No response received
31	Transport Infrastructure Ireland (TII)	Acknowledgement received 1 July 2025; substantive response received 23 July 2025	No response received
32	Uisce Eireann	Out-of-office message received 1 July 2025; no further response received.	No response received
33	Waterford Airport	No response received	No response received
34	Waterford City and County Council- Environment Department	Response received 2 nd of July 2025	Response received 13 th August 2026 (combined WCCC acknowledgement)

35	Waterford City and County Council- Heritage Department	Response received 1 st of July 2025	Response received 13 th August 2026 (combined WCCC acknowledgement)
36	Waterford City and County Council- Roads Department	Response received 2 nd of July 2025	Response received 13 th August 2026 (combined WCCC acknowledgement)
37	Waterford City and County Council- Planning Department	Response received 2 nd of July 2025	Response received 13 th August 2026 (combined WCCC acknowledgement)
38	Dublin Aiport Authority	Response received 22 nd of July 2025	Response received 3 rd September 2026
39	AirNav Ireland	No response received	No response received
40	Irish Coast Guard	Not consulted	No response received

Table 2-6 sets out the detail of Telecommunication consultation responses received. The responses received were fully considered and issues raised where followed up through contact with the respondent where clarification was necessary and addressed throughout the EIAR.

Table 2-6 Telecommunications Scoping and Responses

Ref	Consultee	Date of Response
1	2RN	21 st of November 2024, 29 th September 2026
2	Broadcasting Authority of Ireland	21 st of November 2024
3	Cellnex	No Response Received
4	Dense air	No Response Received
5	Eircom Ltd	20 th of November 2024
6	Electricity Supply Board	9 th of January 2024
7	Enet Telecommunications Networks Limited	21 st of November 2024
8	EOBO Ltd	No Response Received
9	FastCom Broadband Limited	No Response Received
10	Hibernian towers	No Response Received
11	Imagine Networks Services	21 st of November 2024
12	Irish Rail	No Response Received

13	Irish Water	25 th of November, 2024, 22 nd of January 2025
14	Ivertec Ltd	21 st November 2024
15	JFK Communications Ltd	No Response Received
16	JS Whizzy Internet Limited	10 th of January 2025
17	Lackabeha Services Ltd T/A Airwaves Internet	21 st of November 2024
18	Meteor Mobile Communications Limited	No Response Received
19	NBI Infrastructure DAC	4 th of December 2024
20	TETRA Ireland	No Response Received
21	The Irish Aviation Authority	No Response Received
22	Three Ireland (Hutchison) Ltd	10 th of January 2025
23	Towercom	No Response Received
24	Viatel Ireland Ltd	No Response Received
25	Virgin media	14 th of January 2025
26	Vodafone Ireland Ltd	22 nd of November 2024
27	Western Broadband Network	21 st of November 2024
28	Aviation Navigation Ireland	No Response Received

Table 2-7 below provides a summary of the details received from the consultees. The table also identifies the relevant chapter where the points raised by each of the consultees are addressed.

Table 2-7: Consultee responses and relevant chapters

Consultee	Dates of Response	Response Summary Initial Scoping (2025)	Response Summary Updated Scoping (2026)	Addressed in Chapter
Cork Airport	22 nd July 2025	Acknowledgement of receipt of email and request that contact be made directly with Gary Mackin of Dublin Airport.	As requested in 2025, subsequent aviation scoping correspondence was directed to Dublin Airport rather than Cork Airport.	Chapter 15
Dublin Airport (DAA)	22 nd July 2025, 3 rd of September 2026	Acknowledgement of receipt of email and request of approximate coordinates or indicative locations for the proposed 25 turbines.	In July 2025, the DAA requested approximate coordinates or indicative locations for the proposed turbines to enable an informed and comprehensive assessment of potential effects on aviation operations. Following receipt of the updated Environmental Impact Assessment Scoping Report, dated 10 August 2026, the DAA reviewed the Proposed Project in consultation with AirNav Ireland. Based on the information and design details provided, the DAA confirmed that no issues had been identified in relation to the Proposed Project. The DAA stated that it would undertake a further review once the planning application and supporting documentation had been formally submitted. The DAA also requested an opportunity to review revised information if the turbine locations, design, specifications, layout, tip heights or other relevant details change before submission. These have not changed since correspondence with the DAA.	Chapter 15

Consultee	Dates of Response	Response Summary Initial Scoping (2025)	Response Summary Updated Scoping (2026)	Addressed in Chapter
Department of Housing, Local Government and Heritage; Development Applications Unit (DAU)	2 nd of July 2025; 10 th of October 2025	Stated that the information provided was not sufficiently detailed to fully assess archaeological implications. Recommended a comprehensive Archaeological Impact Assessment covering all development lands and including desktop research, field inspections/walkover surveys, an archaeological/historic landscape study, visual impact assessment and, where appropriate, geophysical survey and test excavation. Intrusive site investigations should be archaeologically monitored. The AIA/EIAR should assess direct and indirect effects during construction, operation and decommissioning and include appropriate mitigation. Particular attention was drawn to recorded monuments within or adjacent to the Site, including RMP WA035-009— (Mine), and to effects on the setting and amenity of archaeological monuments.	No response received	Chapter 13 and 14
Department of Defence	16 th of July 2025, 28 th of August 2026	The Department states that, as a matter of practice, it does not provide observations or advice during scoping unless the relevant parties have been directed by a planning authority to seek its views. Following consultation with the Military Authorities, the Department notes that the Minister for Defence is responsible for	The Department states that the Minister for Defence is responsible for regulating military aviation, while the Irish Aviation Authority is responsible for the safety regulation of civil aviation, including aerodromes. The Irish Aviation Authority does not have responsibility for military aviation or	Chapter 15

Consultee	Dates of Response	Response Summary Initial Scoping (2025)	Response Summary Updated Scoping (2026)	Addressed in Chapter
		regulating military aviation, while the Irish Aviation Authority is responsible for the safety regulation of civil aviation, including aerodromes. The safeguarding of military flight operations and installations is intended to protect current and future aircraft operations and associated security requirements. The Department requires all turbines to be fitted with Type C, medium-intensity, fixed red obstacle lighting with a minimum output of 2,000 candela, visible in all directions of azimuth and operational 24 hours a day, 7 days a week. Obstacle lighting should be incandescent or, where LED or another lighting type is used, capable of being detected by night vision equipment. The lighting must emit light in the near-infrared range of the electromagnetic spectrum, specifically at or near a wavelength of 850 nanometres, at an intensity similar to that emitted in the visible spectrum. The Department clarifies that any Irish Air Corps requirements are separate from those of the Irish Aviation Authority. The observations are non-binding and the Minister for Defence reserves the right to comment when a planning application is submitted. The Department requested to be kept informed of the Proposed Project's progress,	installations. Safeguarding military flight operations and installations is intended to protect current and future aircraft operations and associated security requirements. Following consultation with the Military Authorities, the Department requires all turbines to be fitted with Type C, medium-intensity, fixed red obstacle lighting with a minimum output of 2,000 candela, visible in all directions of azimuth and operational 24 hours a day, 7 days a week. Obstacle lighting should be incandescent or, where LED or another lighting type is used, capable of being detected by night vision equipment. The lighting must emit light in the near-infrared range of the electromagnetic spectrum, specifically at or near a wavelength of 850 nanometres, at an intensity similar to that emitted in the visible spectrum. The Department further states that, if the Proposed Project negatively affects future military radar systems, the owner must engage with the Department of Defence and provide suitable mitigation as soon as practicable. The observations are non-binding, and the Minister for Defence reserves the right to comment when a planning application is submitted. The	

Consultee	Dates of Response	Response Summary Initial Scoping (2025)	Response Summary Updated Scoping (2026)	Addressed in Chapter
		particularly if it progresses to the planning stage.	Department also requested to be kept informed of the Proposed Project's progress.	
Department of Transport	22 nd of July 2025, 27 th of August 2026	The Department considers that construction of the Proposed Project, particularly the installation of the grid connection cables, may affect the environment and the regional and local road network. Where cables are proposed within public roads, consideration should be given to restrictions and additional costs placed on the Road Authority when constructing and maintaining roads; potential effects on road stability, particularly on legacy roads and roads constructed over peat or bog ramparts; the availability of road space for future utilities and climate-adaptation drainage; and the potential need to switch off the cables to facilitate road maintenance or respond to structural failures. A complete operation and maintenance manual should be agreed with the relevant Local Authority. For legacy roads and roads over peat or bog ramparts, the design should account for variable ground conditions and include a constructability assessment based on a minimum cover depth of 950mm to the high-voltage cable. The Department refers to Circular RW 07 of 2025 and the associated <i>Interim Guidance to Road</i>	Reiterated the need to demonstrate an optimal grid connection solution and updated the guidance reference to Circular RW 05 of 2026 / Interim Guidance Version 2. Also requested a process for inclusion on the Dial Before You Dig system where relevant contestable electricity infrastructure within public roads is not taken in charge by ESB Networks or EirGrid.	Chapter 3 and 15

Consultee	Dates of Response	Response Summary Initial Scoping (2025)	Response Summary Updated Scoping (2026)	Addressed in Chapter
		<i>Authorities (Placement of Medium or High Voltage Electricity Assets).</i> Grid connection works should avoid affecting the future maintenance, improvement and operation of the regional and local road network. Having regard to the Climate Action Plan 2024, the Department recommends that An Coimisiún Pleanála establish that the proposed grid connection route represents the “optimal solution.” The assessment should examine overhead line and underground cable technologies, or combinations of both, and alternative routes that do not use public roads. Public-road routing should only be selected following a robust multi-criteria analysis identifying the best-performing and most linear solution. Options for connecting to the national grid at a point closer to the Proposed Wind Farm should also be examined to reduce effects on public roads. Where high-voltage cables within public roads are identified as the optimal solution, the Department recommends that: (1) the route and associated traffic management, road-opening licensing, working hours, reinstatement and positioning of chambers and joint bays be agreed with the planning authority before construction; (2) the developer comply with applicable		

Consultee	Dates of Response	Response Summary Initial Scoping (2025)	Response Summary Updated Scoping (2026)	Addressed in Chapter
		standards, including the <i>Guidelines for Managing Openings in Public Roads</i> (2017); (3) cables be installed off the carriageway where feasible; (4) joint bays be located off the carriageway where possible and comply with accepted design standards where installation beneath the carriageway is unavoidable; (5) high- or medium-voltage cables not be placed on or attached to existing road structures, masonry bridges or culverts; (6) cable locations and all affected infrastructure and road features be accurately recorded using BIM-type technology, with as-constructed records lodged with the Local Authority and ESB Networks; (7) culverts excavated during cable installation be appropriately replaced and designed to allow for climate-change effects; and (8) the Roads Authority be notified of the cable owner and power controller, including subsequent changes, with an agreed contact list maintained.		
Fáilte Ireland	18 th of July 2025, 26 th of August 2026	Fáilte Ireland provided its <i>EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects</i> (July 2023). The guidelines recommend that tourism facilities, assets and stakeholders be identified during EIAR scoping and that suitably qualified tourism experts be used where a project may affect	The consultee reiterated the response previously provided in 2025	Chapter 5

Consultee	Dates of Response	Response Summary Initial Scoping (2025)	Response Summary Updated Scoping (2026)	Addressed in Chapter
		tourism assets. The EIAR should identify tourism receptors within the project's zone of influence and describe the character of tourism in the area, including the significance, sensitivity, use and seasonality of relevant tourism assets and activities. The assessment should consider reasonable alternatives, baseline conditions, likely significant effects, cumulative and interactive effects, mitigation, monitoring and residual effects. Potential tourism effects may require consideration under Population and Human Health, Biodiversity, Land, Soils and Geology, Water, Air Quality and Climate, Noise and Vibration, Traffic and Transport, Cultural Heritage, Archaeology, Material Assets and Landscape. Particular consideration should be given to effects on tourism amenities, scenic landscapes and views, cultural and archaeological attractions, accessibility, traffic patterns and construction activity during peak tourism periods or scheduled events. Mitigation should follow the hierarchy of avoiding, reducing and remedying effects and should be measurable and achievable. The guidelines also identify potential information sources, including Fáilte Ireland, Discover Ireland, Tourism		

Consultee	Dates of Response	Response Summary Initial Scoping (2025)	Response Summary Updated Scoping (2026)	Addressed in Chapter
		Ireland, Local Authorities, Regional Assemblies and the Central Statistics Office.		
Geological Survey Ireland – Department of Climate, Energy and the Environment	15 th July 2025	Geological Survey Ireland recommends using its publicly available datasets when preparing the EIAR and advises that all data and maps should be correctly attributed in accordance with the metadata for each dataset. Relevant datasets are arranged by environmental assessment topic and include information on soils, subsoils, geochemistry, geology, geophysics, geotechnical conditions, groundwater, surface water, flooding, climate change, archaeology, underwater archaeology, natural resources, active quarries, landscape character, historic mines, natural geological hazards and geoheritage. Geological Survey Ireland identifies Drumslig County Geological Site, Co. Waterford (Grid Reference 220383, 86874; Site Report WD036), adjacent to the EIAR Site Boundary. The site is classified under Irish Geological Heritage Theme IGH 15: Economic Geology and comprises a shallow, now heavily vegetated quarry in wet grassland. Iron deposits occur within the mudstones and sandstones of the Gyleen Formation, and historical Geological Survey Ireland field sheets record a vein of hematite that	The consultee reiterated the response provided in 2025.	Chapter 8, 9, 11, 13, 14, 15

Consultee	Dates of Response	Response Summary Initial Scoping (2025)	Response Summary Updated Scoping (2026)	Addressed in Chapter
		was formerly exploited. Shafts are recorded on some maps, although no readily visible traces remain beneath the vegetation. The occurrence is considered significant because hematite deposits are rare in Ireland. Based on the current plan, Geological Survey Ireland does not envisage effects on the integrity of existing County Geological Sites. However, it requests further consultation if the Proposed Project layout is altered, so that any potential effects and necessary mitigation can be considered. Geological Survey Ireland also requests copies of reports detailing site investigations undertaken if the Proposed Project proceeds. Subject to confidentiality redaction, the information would be incorporated into its national database of site investigation boreholes. The data supplied represent baseline information or a starting point for further site-specific assessment and should not be interpreted as support for or opposition to the Proposed Project.		
Irish Aviation Authority	7th July 2025, 14 th of August 2026	The Irish Aviation Authority recommends consultation with Waterford Airport, the air navigation service provider AirNav Ireland, the Department of Defence, the Irish Coast Guard Service and the search and rescue operator to make them aware	Reiterated the observations and recommendations provided during the initial scoping exercise in 2025	Chapter 15

Consultee	Dates of Response	Response Summary Initial Scoping (2025)	Response Summary Updated Scoping (2026)	Addressed in Chapter
		of the Proposed Project and ensure that it is appropriately screened from an aviation-safety perspective. Based on the information provided, the Authority states that the IAA Aerodromes Division would likely recommend, during the formal planning process, that the Applicant be required to contact the Irish Aviation Authority to: (1) agree an aeronautical obstacle warning-light scheme for the Proposed Wind Farm; (2) provide the as-constructed coordinates of each turbine in WGS84 format, together with the ground and blade-tip elevations at each turbine location; and (3) provide at least 30 days' advance notice of the intended commencement of crane operations, in accordance with S.I. No. 215 of 2005, <i>Obstacles to Aircraft in Flight Order</i> .		
Irish Wildlife Trust	7 th of July 2025	The Irish Wildlife Trust stated that it did not have the staff capacity to respond to the consultation at that time but would endeavour to provide a response if possible. No observations or recommendations concerning the Proposed Project were provided.	No response received	Not Applicable
Local Authority Waters Programme (LAWPRO)	23 th July 2025	LAWPRO stated that it is not a statutory consultee in the planning process and does not have the capacity or resources to consider EIA scoping requests. LAWPRO	No response received	Not Applicable

Consultee	Dates of Response	Response Summary Initial Scoping (2025)	Response Summary Updated Scoping (2026)	Addressed in Chapter
		recommended forwarding the consultation to the relevant Local Authority planning department. No observations or recommendations concerning the Proposed Project were provided.		
Transport Infrastructure Ireland	23 rd of July 2025	Transport Infrastructure Ireland (TII) states that the Proposed Project should have regard to the <i>Spatial Planning and National Roads Guidelines for Planning Authorities</i> (DoECLG, 2012), TII Publications and the objective of maintaining the strategic capacity and safety of the national road network. Consultation should be undertaken with the relevant Local Authority and National Roads Design Office regarding existing and future national road schemes. The EIAR should assess potential effects on the national road network and associated junctions, including effects arising from the proposed haul route; visual effects from national roads; cumulative effects with road schemes; and the methods proposed for works traversing or located near national roads. The EIAR should also have regard to TII's environmental assessment and construction guidance, including its noise guidance and the European Communities (Environmental Noise) Regulations 2018. Where appropriate, a Traffic and Transport	No response received	Chapter 12, 13, 15

Consultee	Dates of Response	Response Summary Initial Scoping (2025)	Response Summary Updated Scoping (2026)	Addressed in Chapter
		Assessment should be undertaken in accordance with TII's <i>Traffic and Transport Assessment Guidelines</i> (2014), including the provisions for sub-threshold assessments. Any road improvements required to facilitate the Proposed Project should be identified and funded by the developer. TII Publications should also be consulted to determine whether a Road Safety Audit is required. Proposed haul routes should be clearly identified and assessed for abnormal weight and length loads. National road structures along the route should be checked to confirm their capacity, and any required structure approvals, permits, licences and temporary works should be identified. Relevant Public-Private Partnership companies, Motorway Maintenance and Renewal Contractors and road authorities should be consulted regarding operational requirements and delivery scheduling. Where temporary works are required within a Motorway Maintenance and Renewal Contract boundary, TII should be contacted in advance because a works-specific Deed of Indemnity will be required. Any pavement damage arising from abnormal-load movements should be repaired in accordance with TII Pavement Standards and agreed with the Road		

Consultee	Dates of Response	Response Summary Initial Scoping (2025)	Response Summary Updated Scoping (2026)	Addressed in Chapter
		Authority before construction. Grid connection and cable-routing proposals should safeguard existing and proposed national road schemes. TII will not be responsible for the future relocation costs of cables placed within the area of a proposed road scheme. All grid connection route alternatives, including alternatives to using public roads, should be assessed, and routing within the road network must demonstrate that it represents the “optimal solution,” having regard to the Climate Action Plan 2024, Department of Transport Circular RW 07 of 2025 and the associated interim guidance concerning medium- and high-voltage electricity assets. TII notes that several proposals may seek connection to Dungarvan substation, including routes along the N72, and considers that there may be insufficient road space to accommodate all proposals. A coordinated approach to grid connection routing is therefore considered critical. Relevant road-opening consents, licences and separate approvals may be required. Cable routes should avoid existing TII infrastructure, including traffic counters and weather stations, and any associated works must be agreed with TII and funded by the developer. Crossings in the vicinity		

Consultee	Dates of Response	Response Summary Initial Scoping (2025)	Response Summary Updated Scoping (2026)	Addressed in Chapter
		of national roads should be undertaken using horizontal directional drilling and should avoid bridges, culverts and other national road structures.		
Department of Agriculture, Food and the Marine	13 th of August 2026	No response received	The Department states that, where the Proposed Project involves the felling or removal of trees, the developer must obtain a Felling Licence before undertaking those works. A Felling Licence issued under the Forestry Act 2014 authorises the felling or removal of trees or the thinning of a forest for silvicultural purposes, with the Forestry Regulations 2017 providing further effect to the Act. The developer should have regard to the Department's Felling and Reforestation Policy, with particular attention given to deforestation, turbulence felling and the requirement to afforest alternative lands because the Proposed Project is located within forest lands. When assessing a Felling Licence application, the Forest Service will consider the interaction between the proposed works and the local and wider environment, including direct and indirect effects on designated sites and water. Consultation with relevant environmental and planning bodies may be required, including Local Authorities, the National Parks	Chapter 4, 6

Consultee	Dates of Response	Response Summary Initial Scoping (2025)	Response Summary Updated Scoping (2026)	Addressed in Chapter
			and Wildlife Service, Inland Fisheries Ireland and the National Monuments Service. The Department may also require further information, including a Natura Impact Statement. Notice of a Felling Licence application will be published, and submissions may be made within 30 days. Applicants and third parties who make submissions will be informed of the decision and may appeal it to the Forestry Appeals Committee within 14 days. Where a development subject to EIA or Appropriate Assessment directly or indirectly involves tree felling, replanting, deforestation for conversion to another land use, or replacement of broadleaf high forest with conifer species, the EIAR and/or Natura Impact Statement should assess the direct and indirect environmental effects of those works and identify measures to prevent, mitigate or compensate for significant adverse effects. This assessment should be included notwithstanding that a separate Felling Licence may also be required. The Department further states that there must be absolute spatial consistency between the felling areas submitted in the Felling Licence	

Consultee	Dates of Response	Response Summary Initial Scoping (2025)	Response Summary Updated Scoping (2026)	Addressed in Chapter
			application and those shown in all associated planning documentation.	
Waterford City and County	13 th of August 2026	No substantive 2025 Council-wide response identified; separate departments issued acknowledgements/forwarding messages.	Waterford City and County Council acknowledged receipt of the updated scoping information and confirmed that it had been forwarded to the relevant planners for their attention. No observations or recommendations concerning the Proposed Project were provided.	Not applicable
Iarnród Éireann	1 st of July 2025	Advised that all communications should be directed through CIE Group Property and accompanied by a .kmz or .kml file showing the proposed location.	No Response Received	Chapter 15

2.8 Other Consultations

2.8.1 Pre- Planning Meetings

2.8.1.1 An Coimisiún Pleanála

First Pre-Application Meeting - Section 37B

The Applicant engaged with ACP under the provisions of Section 37B of the Act 2000, as to whether the Proposed Project would meet the thresholds of the Seventh Schedule of the Act. The Applicant opened consultations with ACP on the 16th of October 2025 in relation to a Proposed Project of approximately 24 no. wind turbines with an overall ground to blade tip height mix ranging from 170-185m and all associated works including, associated hardstands, electrical cabling and site development works with the potential for the wind farm to generate greater than 50 Megawatts (MW) of electricity to the National Grid.

A SID meeting under the provisions of Section 37B was held with ACP on the 16th of October 2025 via MS Teams. Those in attendance were:

On behalf of ACP:

- > Una Crosse, Assistant Director of Planning,
- > Susan Clarke, Senior Planning Inspector,
- > Fiona Patterson, Senior Ecologist/Environmental Scientist,
- > Emmet Smyth, Senior Environmental Scientist,
- > Sinead White, Executive Officer,

On behalf of Agent and Applicant:

- > Ronan Dunne, MKO
- > Hannah Rice, MKO
- > Eoin McCarthy, MKO
- > Natalia Stolarska, MKO
- > Corey Cannon, MKO
- > Emily Fair, MKO
- > Susan Doyle, MKO
- > Colin Fitzgerald, MKO
- > Jack Workman, MKO
- > William O'Connor, Slievegrine Ltd
- > Darren Feury, Slievegrine Ltd

The design team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- > Details about the Proposed Project,
- > RED III,
- > Completeness check,
- > Proposed Project was discussed together with energy policy at an International, European, National, Regional and local level.
- > Environmental Impact Assessment, including surveys and fieldwork completed to date
- > Completeness Check
- > Proposed Project Timeline

Following this presentation, there was further discussion held between the project team and the representatives of ACP. Matters discussed included:

- ACP's representatives clarified that the pre-application consultation process does not comprise an assessment of the proposed application documentation nor does it consider the merits of the proposal but provides an opportunity to address the procedures and considerations to facilitate the processing of the application.
- The Applicant outlined that there was an error in the turbine tip heights outlined within the presentation submitted in advance of the meeting and advised that an updated slide with the revised details will be sent to ACP.
- ACP's representatives queried whether the Applicant will be likely to seek design flexibility, the Applicant informed ACP's representatives that they are not currently seeking design flexibility but that could change in the future.
- It was clarified that it is the intention of the prospective that the proposed application would comprise of the proposed windfarm and the grid connection in a single application under Section 37E of the Act, as amended.
- Following a query from ACP's representatives, the Applicant clarified that the Environmental Impact Assessment Report will cover all phases from construction to decommissioning of the proposed development, and it was also clarified that the proposed development is not located within the boundaries of a Gaeltacht area.
- ACP's representatives advised that the Applicant consider, in addition to the wider national planning policy context, the local planning policy considerations within the County Development Plan which may have a bearing on the subject site as well as the policy context in respect of the proposed development.
- The Applicant clarified that there are no peat deposits on the site and outlined the location of most proximate residential receptors.
- ACP's representatives advised that the documentation should have a consistent reference to boundaries whether red line or EIAR study area and that the EIAR chapters should be clear on same.
- The inclusion of the Water Framework Directive Assessment as a stand-alone document within the EIAR was advised.
- ACP's representatives advised that the Noise Chapter should address amplitude modulation and tonal noises and mitigation protocols for same at operational stage. Clarity in respect of shadow flicker mitigation was also advised.
- ACP's representatives advised the Applicant on the current position in respect of the completeness check and mandatory EIA scoping and advised that consultation with the NPWS was advisable.
- Proximity of the site to Natura 2000 sites was noted.

Second Pre-Application Meeting – Section 37B

The Applicant engaged with ACP for a second pre-application meeting under Section 37B of the Act. The second meeting was held on the 24th of February 2026 via Microsoft (MS) Teams. Those in attendance were:

On behalf of ACP:

- Una Crosse, Assistant Director of Planning,
- Susan Clarke, Senior Planning Inspector,
- Paula Kearney, Senior Ecologist,
- Emmet Smyth, Senior Environmental Scientist,
- Sinead White, Executive Officer,

On behalf of Agent and Applicant:

- > Ronan Dunne, MKO
- > Sean McCarthy, MKO
- > Eoin McCarthy, MKO
- > Natalia Stolarska, MKO
- > Corey Cannon, MKO
- > Emily Fair, MKO
- > Aron Von Der Geest Moroney, MKO
- > Susan Doyle, MKO
- > Colin Fitzgerald, MKO
- > William O'Connor, Slievegrine Ltd
- > Darren Feury, Slievegrine Ltd

The project team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- > Update on the Proposed Project
- > Biodiversity
- > Ornithology
- > Hydrology
- > Land and Soils
- > Appropriate Assessment

Following this presentation, there was further discussion held between the project team and the representatives of ACP. Matters discussed included:

- > ACP's representatives queried further detail regarding various elements Proposed Project such as lengths of roads proposed, heights of new end masts proposed and borrow pit detail.
- > ACP's representatives advised the Applicant to consult with the Local Authority's Transportation Department with respect to works to local roads and new sight entrances.
- > The Applicant stated that the turbine model and delivery route are yet to be confirmed.
- > ACP's representatives advised the Applicant to consult with ESB/EirGrid in relation to grid connection works in advance of submitting an application.
- > The Applicant advised that there is no BESS proposed as part of the application.
- > ACP's representatives highlighted the requirement to seek landowners' consent, where relevant, to make the planning application.
- > The Applicant advised that all construction material for access tracks, hardstanding areas, etc. will be locally sourced from borrow pits.
- > ACP's representatives welcomed the inclusion of riparian planting as part of the Proposed Project.
- > ACP's representatives advised on various items relating to biodiversity including that ecological surveys should be carried out on the Turbine Delivery Route (TDR) at any accommodation areas.
- > ACP's representatives advised on and also queried about various aspects relating to ornithology, such as length of bird surveys, vantage point selection, guidelines by which the surveys are based on, importance of golden plover at the site and cumulative assessment.
- > ACP's representatives advised on and also queried about various aspects relating hydrology, hydrogeology, land and soils at the site including presence of a clay pan on the site, tree felling as a stressor to the hydrological system on the site, flow monitoring and presence of an ecological clerk of works during the construction phase that has an understanding of freshwater pearl mussel.

Third Pre-Application Meeting – Section 37B

The Applicant engaged with ACP for a third pre-application meeting under Section 37B of the Act. The second meeting was held on the 11th of March 2026 via Microsoft (MS) Teams. Those in attendance were:

On behalf of ACP:

- > Una Crosse, Assistant Director of Planning,
- > Susan Clarke, Senior Planning Inspector,
- > Paula Kearney, Senior Ecologist,
- > Emmet Smyth, Senior Environmental Scientist,
- > Sinead White, Executive Officer,

On behalf of Agent and Applicant:

- > Ronan Dunne, MKO
- > Eoin McCarthy, MKO
- > Natalia Stolarska, MKO
- > Henning Moe, MKO
- > Jack Workman, MKO
- > Susan Doyle, MKO
- > Aron Von Der Geest Moroney, MKO
- > William O'Connor, Slievegrine Ltd
- > Darren Feury, Slievegrine Ltd

The project team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- > Update on Development Proposal
- > Landscape
- > Noise
- > Other Material Assets
- > Consultation Update
- > Consideration of the presentation of documents
- > Other considerations:
 - Turbine Delivery Route
 - Ornithology update
 - Freshwater pearl mussel
 - Hydrology and Hydrogeology

Following this presentation, there was further discussion held between the project team and the representatives of ACP. Matters discussed included:

- > ACP's representatives queried various aspects of the Proposed Layout relating to the site access, turbine models, lengths of roads, heights of masts and recommended for the development description to be as informative as possible.
- > ACP's representatives noted the presence of scenic routes adjacent to the site and 2 no. proposed substations to be built, noting that adequate assessment of both should be provided as part of the LVIA.
- > ACP's representatives made numerous recommendations in terms of the noise assessment to consider, including wake effects, cumulative assessment, noise monitoring locations and mitigation in relation to noise exceedances.

- Update provided on ornithology with ACP representatives advising that to inform a robust baseline on avifauna and project Zone of Influence (ZoI), it is essential to consult with statutory bodies, non-government organizations and available datasets.
- Prospective Applicants provided an update on the assessment of potential impacts in relation to Freshwater Pearl Mussel and Hydrology and Hydrogeology. ACP representatives emphasised the need for a collaborative, multidisciplinary approach to ensure that the proposed development does not negatively alter the baseline environmental conditions.
- Prospective Applicant advised that they will be seeking a formal EIA scoping opinion from ACP subsequent to the SID determination. ACP representatives advised the Applicant that EIA scoping is a separate process to the pre-application consultation process and that it could not be confirmed whether amendments to the schedule of information to inform the completeness check which would accompany the SID determination would be required following the EIA scoping requirements.
- In response to a query from the ACP representatives with respect to how shadow flicker is proposed to be addressed, the Applicant advised that the proposal will be designed to comply with the Guidelines (DoEHLG, 2006) and will also comply with the Draft Guidelines (DoHPLG, 2019) should they come into force. ACP representatives noted that notwithstanding the Draft Guidelines (DoHPLG, 2019) are in draft format, it is recommended that the precedent established by wind farm developments recently permitted/approved by ACP with respect to shadow flicker mitigation measures are considered.

SID Determination

A letter received from ACP dated the 31st of August 2026 (ACP- 323038-25) stated that under Section 37B (4)(A), it is the opinion of ACP that the Proposed Project falls within the scope of the paragraphs 37A(2)(a) and (b) of the Act. This confirmed that the Proposed Project constitutes SID and therefore the planning application should be made directly to ACP.

2.8.1.2 Waterford City & County Council

The Applicant and members of the design team met with WCCC in relation to the Proposed Project prior to the submission of this planning application. The pre-planning meeting took place on 26th of February 2026 via MS Teams and included representatives from WCCC, Slievegrine Ltd. and MKO. The team gave a PowerPoint presentation as an introduction to the site and development proposals.

Those invited and in attendance at the meeting were as follows:

On behalf of WCCC:

- Marcus Linehan, Executive Planner,
- Bernadette Guest, Heritage Officer,

On behalf of Agent and Applicant:

- Ronan Dunne – MKO
- Eoin McCarthy, MKO
- Natalia Stolarska, MKO
- William O'Connor, Slievegrine Ltd
- Darren Feury, Slievegrine Ltd

The project team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- > Project Background
- > Design Process
- > Project Overview
- > Turbine Delivery Route
- > Designated Sites
- > Biodiversity and Ornithology
- > Environmental Impact Assessment Report
- > Planning Policy
- > Landscape and Visual Impact
- > Consultation

Following this presentation, there was further discussion held between the project team and the representatives of WCCC. Matters discussed included:

- > Representatives from WCCC noted that a thorough landscape and visual assessment should be carried out, with consideration being made to the scenic routes in the area.
- > Representatives from WCCC noted that the area is located within a favourable local policy and landscape policy for the site, however noted that this is a general classification and impacts may still occur as a result of the wind farm development.
- > Representatives from WCCC noted presence of FWMP in the area, with linkages between the site and water quality requiring thorough assessment and welcomed the addition of enhancement for the Site.
- > Representatives from WCCC encouraged consultation with TII guidance on intangible heritage and encouraged the use of online heritage maps.
- > Representatives from WCCC queried quantities of felling and whether a felling license would be obtained.

2.8.2

Community Engagement

The Community Liaison Strategy for the Proposed Project was based around engaging with the local community in an open, honest and transparent manner with the aim to not only provide clear and understandable information but also to gain feedback to understand the views of the local community. This feedback and information were used to inform the design process. The community consultation effort was led by Slievegrine Ltd.

A Community Liaison Officer (CLO) was appointed and remains as the point of the contact for the Proposed Project and has been engaging with the local community. The purpose of the CLO is to introduce the Proposed Project to the local community, engage and establish a line of dialogue with the local community and facilitate one-to-one consultation meetings, or small group meetings where requested. Contact details for the CLO have been provided, for local residents to get in touch with any queries or comments regarding the design and assessment of the Proposed Project as it progresses. A project website (<https://slievegrineinfo.com/>) remains available in order to provide details on the progress of the project, the community consultation effort and provide a method for members of the public to submit queries and comments to the CLO via the online contact form. Community consultation will continue throughout the entire Proposed Project timeline, and the CLO will remain available to interact with the local community.

On the 4th of February 2026 and 15th of September 2026, Public Information Events were held in the Part Hotel, Dungarvan. The objective of the consultations was to ensure that the views and concerns of all were considered as part of the Proposed Project design and EIA process. Appendix 2-2 of this EIAR contains a full and detailed community engagement report. The report was prepared to record the consultation carried out with the local community in respect of the Proposed Project. Active engagement and consultation with the local community have taken place since the public information event. The consultation process has been an extremely valuable exercise and has provided a detailed,

and enhanced understanding of the key issues and concerns of the local community, which have ultimately shaped the final project proposal. There is currently on-going consultation with the local community, and it is the intention of the Applicant to continue with the consultation for the entire lifespan of the Proposed Project.

The development of the Proposed Project will provide an enduring economic benefit to the communities surrounding the Proposed Project, through the potential community benefit package for residents and community groups, employment during the construction and operation of the Proposed Project and through the annual rates payable to the Local Authority.

Please refer to the Community Engagement Report at Appendix 2-2 of the EIAR for further details.

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-, and long-term, permanent, and temporary, positive and negative effects of the project (all of which are considered in the various chapters of this EIAR), the description of likely significant effects should include an assessment of cumulative impacts that may arise. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to the project. The factors to be considered in relation to cumulative effects include population and human health, biodiversity, land, soil, water, air, climate, material assets, landscape, and cultural heritage as well as the interactions between these factors.

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

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

2.9.1

Methodology for the Cumulative Assessment of Projects

The EIA Directive includes a requirement to consider ‘a *cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources.*’ The methodology for the cumulative assessment has been informed by the relevant guidance documents and by the nature and scale of the Proposed Project.

The potential cumulative impact of the Proposed Project, combined with the potential impact of other projects has been carried out with the purpose of identifying the potential influence of the Proposed Project on the surrounding environment when considered collectively with approved and existing projects, projects currently under consideration by relevant planning authorities, projects in the public domain, including SID projects at pre-application consultation stage with ACP, and other relevant land uses in the vicinity of the Proposed Project.

The cumulative impact assessment of projects has two principle aims:

1. *To establish the range and nature of existing and approved projects within the cumulative impact study area of the Proposed Project.*
2. *To identify the projects that hold the potential for cumulative interaction within the context of the Proposed Project and discard projects that will neither directly or indirectly contribute to cumulative impacts. (Note: this is done by individual experts with respect to their specialist area of expertise.)*

Projects were identified through a search of relevant online planning registers and effects were considered following a review of associated EIARs.

2.9.2

Establishing the Cumulative Long List

To establish a long list of existing, permitted and proposed projects to be included in the cumulative impact assessment, cumulative study areas were established for each individual topic area in the EIAR. Following consultation with the EIAR team on each individual topic, the maximum geographical extent of each cumulative study area and justification for this extent was established and is presented in Table 2-8 below. Each cumulative study area was established with regard for the potential environmental receptors, potential impact pathways, topic specific guidance, best practice and professional judgement.

Table 2-7 Cumulative Study Area and Justification

Individual Topic	Maximum Extent	Justification
Population & Human Health (including shadow flicker)	Proposed Project Proposed Project Study Area for Population (District Electoral Divisions) Shadow Flicker Study Area (10xRD buffer from proposed turbines) Consideration for the Population & Human Health cumulative extent is also given to the Air & Climate, Noise, Hydrology and Hydrogeology and Landscape & Visual (i.e. Residential Visual Amenity) Cumulative Study areas	The Study Area for Population is identified in Section 5.3.1 in Ch. 5: Population and Human Health as the District Electoral Divisions where the Site is located. Both the Proposed Wind Farm and Proposed Grid Connection are considered for cumulative effects on Population. For the assessment of cumulative shadow flicker, any other existing, permitted or proposed wind farms are considered where their ten times rotor diameter shadow flicker study area are located within the Shadow Flicker Study Area of max 1.62km (ten times the rotor diameter from proposed turbines) for the Proposed Wind Farm.
Biodiversity – Flora & Fauna	Proposed Wind Farm 10km from the Proposed Wind Farm site. Proposed Grid Connection 250m from the Proposed 110kV Underground Cabling Route. Consideration for the Biodiversity cumulative extent is also given to the Ornithology and Hydrology and Hydrogeology Cumulative geographical boundaries.	Using the precautionary approach and given the nature and scale of the Proposed Project, the geographical boundary for terrestrial ecological aspects, i.e. habitats and terrestrial fauna, is 10 km for cumulative assessment for the Proposed Wind Farm site in line with NatureScot (2021) guidance for assessment of bats. This geographical boundary is considered commensurate for other terrestrial ecological KERs identified within the Proposed Wind Farm site. The geographical boundary from the Proposed Grid Connection is 250m, which is considered commensurate with the type and scale of this development type, and the KERs identified in the vicinity of the Proposed Grid Connection.
Biodiversity - Bats	Proposed Wind Farm 10km from the Proposed Wind Farm site. Proposed Grid Connection	Using the precautionary approach and given the nature and scale of the Proposed Project, the geographical boundary for terrestrial ecological aspects, i.e. bats, is 10 km for cumulative assessment for the

Individual Topic	Maximum Extent	Justification
	250m from the Proposed 110kV Underground Cabling Route	Proposed Wind Farm and 200 m from the Proposed 110kV Underground Cabling Route
Ornithology (Birds)	25km buffer from proposed turbines for large infrastructural development, such as wind farms, energy.	NatureScot guidance ‘Assessing the Cumulative Impacts of onshore Wind Energy Developments’ (SNH, 2012; 2018) was consulted while undertaking the cumulative assessment. SNH (2012; 2018) emphasises that its priority is to ‘maintain the conservation status of the species population at the national level.’ However, it is acknowledged that consideration should also be allowed for impacts at the regional level ‘where regional impacts have national implications (for example where a specific region holds the majority of the national population)’. Following the guidance of SNH (2012), the cumulative impact assessment has been carried out at the scale of the importance rating of the receptor. A 25km radius of the Proposed Turbines was considered a reasonable approximation of the size of a county and a 5km radius of the Proposed Wind Farm site turbines was considered a reasonable approximation for the local level.
Land, Soils and Geology	Proposed Project EIAR Site Boundary	As there is no pathway for offsite cumulative impacts for Land, Soils and Geology, the cumulative study area is the EIAR Site Boundary.
Hydrology and Hydrogeology	Proposed Project Goish and Colligan subcatchments for large infrastructural developments such as wind farms, energy and public transport developments.	These subcatchments and river basins have been chosen to represent the hydrology and hydrogeology study area due to the Proposed Project will contain works in these catchments/basins.

Individual Topic	Maximum Extent	Justification
	River Sub Basins for all smaller proposed, permitted or existing plans or projects (i.e. private and commercial type developments).	
Air Quality and Climate	Proposed Wind Farm Air Quality Study Area is 1km from Proposed Wind Farm. Proposed Grid Connection 250m from Proposed 110kV Underground Cabling Route.	Given dust particles do not generally travel greater than 500m from source (Guidance on the Assessment of Mineral Dust Impacts for Planning, IAQM 2016) the geographical boundary for the cumulative dust impact is 500m. In line with the TII Publication Air Quality Assessment of Proposed National Roads – Standard PE-ENV-01107, December 2022, a geographical boundary of 1km was used for cumulative air quality assessment. The Climate assessment has considered the cumulative effects of the Proposed Projects with other developments on a national basis and within the context of the national Carbon Budget and relevant sectoral emissions ceiling.
Noise & Vibration	Proposed Wind Farm The list of wind farms which are considered in cumulative assessment is 10km from Proposed Turbines. Proposed Grid Connection 250m from the Proposed 110kV Underground Cabling Route	The geographical boundary for the cumulative noise assessment is the area within which noise levels from the proposed, consented and existing wind turbine(s) may exceed 35 dB LA90 at up to 10m/s wind speed (Institute of Acoustics document Good Practice Guide To The Application Of Etsu-R-97 For The Assessment and Rating of Wind Turbine Noise).

Individual Topic	Maximum Extent	Justification
Cultural Heritage	Proposed Project 20km from Proposed Turbine locations- non-wind farm projects 25km from Proposed Turbines- wind farm projects	The study area reflects the 10km study area assessed sites of national significance, including National Monuments under state care or guardianship and any sites subject to a Preservation Order.
Landscape & Visual	Proposed Project 25km from Proposed Turbine locations for visual and landscape effects. 15km from Proposed Turbine locations for effects on landscape character.	The LVIA Study Area was chosen to be 25km from the Proposed Turbines for landscape and visual effects, due to the Copper Coast UNESCO Global Geopark, a landscape of national renown with its closest point being located approximately 16.2km northeast from the nearest Proposed Turbine. The 25km LVIA Study Area was chosen to include this landscape area as per the Guidelines (DoEHLG, 2006). Through experience conducting LVIA for other wind energy development projects, the assessment team determined that no significant effects on landscape character are likely to arise beyond distances of 15km from the proposed turbines. Therefore, a LVIA Study Area of 15km is deemed appropriate for effects on landscape character in relation to the assessment of effects upon designated Landscape Character Areas.
Material Assets: Traffic & Transport	Proposed Wind Farm The list of wind farms which are considered in cumulative assessment is 25km from Proposed Turbines. Larger developments which may have the potential to cause significant traffic and transport effects have been considered at a 10km radius from the Proposed Turbines. Proposed Grid Connection	Informed by traffic modelling scenario and the area of influence the Proposed Project has on changing traffic volumes. The potential cumulative traffic effects with the Proposed Project are assessed on the following criteria: ➤ Project status (proposed to operational) ➤ Degree of overlap with the Proposed Project delivery highway network (low to high)

Individual Topic	Maximum Extent	Justification
	250m from proposed 110kV underground cabling route.	➤ Traffic volumes (low to high) The geographical boundary for the traffic & transport cumulative assessment is defined by the potential for other projects to overlap with the Proposed Project delivery highway network, and so a 25km buffer from turbines and 250m buffer from the Proposed Grid Connection 110kV underground cabling route is deemed appropriate to capture other plans and projects with the potential for cumulative effects with the Proposed Project.
Material Assets: Telecoms, Aviation and Other Utilities	Proposed Wind Farm The list of wind farms and other projects which were initially considered in cumulative assessment extended to 25km. Proposed Grid Connection 250m from the proposed 110kV underground cabling route	The geographical boundary for the telecoms cumulative assessment is defined by the potential for other wind farm projects to interfere with broadcast signals that interact with the Proposed Project.

The maximum extent of each cumulative search buffer was determined by the largest specific cumulative study area buffer (25km from Proposed Turbines), as shown in Table 2-8 above. All EIAR chapters did not use the maximum extent of the largest buffer. In instances where a specific chapter's cumulative study area was smaller than the cumulative search maximum extent, the cumulative long list was filtered by distance to infrastructure/boundary, creating a chapter specific long list unique to each cumulative study area set out in Table 2-8 above.

Once the cumulative study areas were identified and justified, a search was conducted across various platforms and databases in order to compile a list of projects and ongoing activities in the area. The sources used to establish the cumulative long list are provided in Table 2-9 below. The data was first compiled spatially through a Geographic Information System (GIS). The spatialised data was then exported into a list for further scrutiny and review. This formed the cumulative long list provided in Appendix 2-3.

Table 2-8 Data sources used for long list compilation

Title	Description	Author
Planning Applications	https://housinggovie.maps.arcgis.com/apps/webappviewer/index.html?id=9cf2a09799d74d8e9316a3d3a4d3a8de	Department of Housing, Local Government and Heritage
An Coimisiún Pleanála Cases	https://www.pleanala.ie/en-ie/map-search	An Coimisiún Pleanála
EIA Portal Points	https://housinggovie.maps.arcgis.com/apps/webappviewer/index.html?id=d7d5a3d48f104ecbb206e7e5f84b71f1	Department of Housing, Local Government and Heritage
Licensed Facilities	https://gis.epa.ie/EPAMaps/	EPA
Waste Schemes	https://gis.epa.ie/EPAMaps/ & MKO's internal database	EPA & MKO

To allow sufficient time for the cumulative impact assessment to be undertaken for each EIAR topic, the final search and compilation of the cumulative plans and projects list was carried out in August 2026.

A subsequent high-level review was undertaken to identify any significant large-scale developments that may have been lodged since the August 2026 search.

2.9.3 Projects Considered in the Cumulative Impact Assessment

2.9.3.1 Planning Applications & Permissions

A search was conducted using data from WCCC and ACP planning portals to search for all planned and/or permitted planning applications within 25km of the Application Site boundary (as listed in Appendix 2-3). Planning applications considered within this boundary include all live/extant permissions available on the various online portals mentioned above. This distance was chosen as it is

considered that cumulative impacts would not exist with any development proposed/permitted greater than 25km from the Site.

Expired planning applications were excluded from the cumulative assessment as it is considered that such development has either been constructed and therefore forms part of the existing baseline or they have not been constructed and the planning permission has expired. Invalid or refused planning applications were also excluded from the cumulative impact assessment. Planning applications (including Local Authority and ACP cases) were then categorised by development description into development categories, and any relevant/large-scale developments were highlighted to the EIAR project team for inclusion in the cumulative impact assessment in each individual EIAR chapter.

2.9.3.2 Wind Farm Applications within 25km of the Proposed Turbines

A planning search was carried out to establish proposed, permitted and operational wind energy developments within 25km of the Proposed Turbines. The search was carried out using the relevant local authority and ACP databases in September 2026 for relevant planning applications. In total, 7 no. applications relating to wind energy were identified within 25km of the Proposed Turbines. These are outlined in greater detail in Table 2-4 above.

In addition to this, wind energy developments at pre-application stage or within the public domain (i.e. public consultation commenced) are also considered and included in the cumulative wind farm list within 25km of Proposed Turbines. These are summarised below:

- Ballycurreen Wind Farm (Existing), 5.92km
- Knocknamona Wind Farm (Permitted), 2.97km
- Lyrenacarriga Wind Farm (Permitted), 11.87km
- Scart Mountain Wind Farm (Proposed), 14.04km
- Woodhouse Wind Farm (Existing), 4.87km
- Moanbrack (Proposed), 5.64km
- Dyrick Hill Wind Farm (Proposed), 5.7km

2.9.3.3 Other Developments/Land uses

The review of the relevant County Council planning registers documented relevant general development planning applications in the vicinity of the Site, the majority of which relate to the provision and/or alteration of one-off rural housing and the provision of agricultural buildings. These applications and land uses have also been taken account in describing the baseline environment and in the relevant assessments.

Furthermore, the cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider all potential significant cumulative effects arising from all land uses in the vicinity of the Proposed Project. These include ongoing agricultural practices/forestry practices, quarries and extractive industries, intensive production/ processing industries, large infrastructure projects and other EIAR projects.

2.9.3.4 EPA Licenced Activities

Environmental Protection Agency (EPA) licensed activities refer to industrial and waste management operations that require a license from the EPA under various pieces of environmental legislation. A list of all EPA licenced activities within the cumulative study area is included in Appendix 2-3.

The categories of EPA licenced activities considered as part of the cumulative assessment are as follows:

- > Industrial Emissions (IE) Licensing;
- > Integrated Pollution Control (IPC) Licensing;
- > Waste Licensing; and
- > Waste Water Discharge Authorisations.

2.9.3.5 Arterial Drainage Schemes

The Office of Public Works (OPW) carries out several Arterial Drainage Schemes on catchments under the Arterial Drainage Act, 1945. Under section 37 of the 1945 Act, the OPW is required to maintain drainage works in proper repair and effective condition. These drainage works include watercourses, embankments and other structures.

Watercourses are subject to siltation and erosion, among other processes, while embankments are subject to settlement and erosion. There are no arterial drainage schemes or benefited lands within the vicinity of the Site.

2.9.3.6 Commercial Forestry

A review of the Department of Agriculture, Food and the Marine Forestry License Viewer shows a number of felling licenses active within the wider area. The forestry subject to these licenses may or may not be felled before the Proposed Project goes to construction stage. Therefore, a search of the active felling licenses will be carried out pre-construction and the Applicant will liaise with forestry contractors to carry out the felling related to the Proposed Project at times that minimise the potential for cumulative effect arising from commercial forestry felling within the same sub-catchments.

2.9.4 Summary

The cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider all potential significant cumulative effects arising from relevant projects and/or plans and land uses within the cumulative study area and within the vicinity of the Proposed Project.

Overall, the Proposed Project has been designed to avoid and mitigate impacts on the environment, and a suite of mitigation measures is set out within the EIAR. The mitigation measures set out in this EIAR will ensure that significant cumulative effects do not arise during the construction, operational or decommissioning phases of the Proposed Project. Additional detail in relation to the potential significant cumulative effects arising and, where appropriate, the specific suite of relevant mitigation measures proposed are set out within each of the relevant chapters of this EIAR.