Environmental Impact Assessment Report (EIAR)

Killoshulan Wind Farm

Chapter 2 – Background to the Proposed Project

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Background to the Proposed Project

GLOSSARY OF TERMS

Terms	Definition
Carbon Budgets	The maximum cumulative amount of greenhouse gas emissions that can be released into the atmosphere while limiting global warming to a specified level, between 1.5 and 2 degrees
Climate Action Plan	National framework document for measuring, tracking and reducing greenhouse gas emissions and adopting climate adaptation measures.
Climate Action and Low Carbon Development (Amendment) Act	Ireland's legally binding framework which aims to achieve a climate-neutral economy by 2050, requiring a 51% reduction in greenhouse gas emissions by 2030
Climate Change Advisory Council	An Independent advisory body providing evidence-based advice and recommendations on policy to support Ireland's just transition to a biodiversity rich, environmentally sustainable, climate neutral and resilient society.
Conference of the Parties	The meetings of parties to the United Nations Framework Convention on Climate Change at which international climate action is reviewed and negotiated.
Cumulative Impact Assessment	An assessment of potential environmental effects of the Proposed Project in combination with other existing, permitted or proposed projects.
Draft Ministerial Direction	The proposed statutory intervention concerning specified renewable energy provisions and wind strategy areas of the Kilkenny City and County Development Plan 2021–2027.
Draft Revised Wind Energy Development Guidelines (2019)	Draft updated national guidance for the planning and assessment of wind energy development.
European Climate Law	The EU legislative framework establishing climate neutrality by 2050 and binding intermediate emissions-reduction objectives.
European Green Deal	An EU policy launched in 2019, aiming to cut emissions by at least 50% by 2030, rising towards 55%, while legally binding the 2050 neutrality goal through the European Climate Law.
Kyoto Protocol	An international treaty adopted in December 1997, requiring industrialised nations to reduce GHG emissions based on principle of common but differentiated responsibilities
National Energy Projections	Predictions of future energy use in Ireland under different scenarios and account for factors such as economic growth
National Energy Security Framework	Policy document produced by Irish government to provide an overarching and comprehensive response to Ireland's energy security needs in the context of the war in Ukraine.
National Planning Framework	A long-term, 20-year strategy for strategic planning and sustainable development of urban and rural areas to 2040, with the core objectives of securing balanced regional development and a sustainable 'compact growth,' approach to the form and pattern of future development.
Paris Agreement	A legally binding international treaty adopted in 2015 to combat climate change, aiming to limit global temperature rise to well below 2 degrees, preferably 1.5 degrees above pre-industrial levels

Planning and Development Act 2000	An Act which sets out the law relating to planning and development in Ireland.
Planning and Development Act 2024	An Act to consolidate and revise the law relating to planning and development in Ireland. Once fully commenced it will effectively supersede the Planning and Development Act 2000 and is acknowledged as a major reform to speed up housing delivery and make the planning system clearer and more efficient.
Regional Spatial and Economic Strategy	The statutory regional strategy setting out planning and development objectives for the Southern Region.
Renewable Energy Directive	An EU Directive which aims to accelerate the EU's renewable energy transition and promote energy independence
REPowerEU	A European Commission plan launched in May 2022 to rapidly reduce dependence on Russian fossil fuels and to accelerate the green energy transition following Russia's invasion of Ukraine.
Scoping	The process of consulting relevant bodies and identifying issues and information to be addressed in the EIAR.
Sectoral Emissions Ceilings	Limits on greenhouse gas emissions allocated to individual sectors of the Irish economy for specified carbon budget periods.
Strategic Area	Designated areas deemed most suitable for wind farm development due to high wind speeds, existing grid capacity and low environmental or residential constraints.
United Nations Framework Convention on Climate Change	1992 International Treaty aimed at stabilising atmospheric greenhouse gas concentrations to prevent dangerous human-induced climate interference.
Wind Energy Development Strategy	The wind energy policy and spatial strategy associated with the Kilkenny City and County Development Plan 2021-2027, subject to the draft Ministerial Direction and the previous Kilkenny City and County Development Plan 2014-2020 as discussed in Chapter 2.

GLOSSARY OF ACRONYMS

Acronym	Meaning
AA	Appropriate Assessment
ACP	An Coimisiún Pleanála
AIP	Acceptable in Principle
BAI	Broadcasting Authority of Ireland
CAP	Climate Action Plan
CB	Carbon Budget
CCAC	Climate Change Advisory Council
CEMP	Construction and Environmental Management Plan
CIP	Cleaning in Place
CLO	Community Liaison Officer
COP	Conference of Parties
CRU	Commission for Regulations of Utilities
DAFM	Department of Agriculture, Food and the Marine
DAU	Development Applications Unit
DCCAE	Department of Communications, Climate Action and Environment
DCENR	Department of Communications, Energy and Natural Resources
DECC	Department of the Environment, Climate and Communications
DoECC	Department of Environment, Climate and Communications
DoEHLG	Department of Environment, Heritage and Local Government
DoHPLG	Department of Housing, Planning and Local Government
DZ	Decarbonation Zone
ECP	Electricity Connection Policy
ECP-GSS	Electricity Connection Policy – Generation and System Services
EEC	European Economic Community
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
EIS	Environmental Impact Statement
EPA	Environmental Protection Agency
ESB	Electricity Supply Board
ESR	Effort Sharing Regulation
GW	Gigawatt
GWh	Gigawatt-hour
EU	European Union
GHG	Greenhouse Gas
GSACR	Global Shield Against Climate Risk
GST-1	First Global Stocktake
IAA	Irish Aviation Authority
IAQM	Institute of Air Quality Management
ICCA	Ireland's Climate Change Assessment
IEA	International Energy Authority
IPCC	Intergovernmental Panel on Climate Change
IWEA	Irish Wind Energy Association
KCC	Kilkenny County Council
KCCDP	Kilkenny City and County Development Plan 2021-2027
KCCDP 2014-2020	Kilkenny City and County Development Plan 2014-2020
kV	Kilovolt

LACAP	Local Authority Climate Action Plan
LCA	Landscape Character Assessment
LCC	Laois County Council
LED	Light Emitting Diode
LiDAR	Light Detection and Ranging
LNG	Liquefied Natural Gas
LVIA	Landscape and Visual Effects
MS	Microsoft Teams
MtCO2eq	Million tonnes of carbon dioxide equivalent
MW	Megawatts
NDP	National Development Plan
NESF	National Energy Security Framework
NGO	Non-Governmental Organisation
NIS	Natura Impact Statement
nm	nanometres
NPF	National Planning Framework
NPO	National Policy Objectives
NPWS	National Parks and Wildlife Service
NREAP	National Renewable Energy Action Plan
OPR	Office of the Planning Regulator
PAS	Plans to Accelerate Solutions
RED	Renewable Energy Directive
RES	Renewable Energy Sources / Renewable Energy Share (as used in context)
RESS	Renewable Electricity Support Scheme
RES-E	Renewable Energy Share in Electricity
RPO	Regional Policy Objective
RSES	Regional Spatial and Economic Strategies
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SEAI	Sustainable Energy Authority Ireland
SID	Strategic Infrastructure Development
SRA	Southern Regional Assembly
SuDS	Strategic Infrastructure Development
SWMP	Surface Water Management Plan
T	Turbine
TCC	Tipperary County Council
TII	Transport Infrastructure Ireland
TWh	Terawatt-hour
UHF	Ultra High Frequency
UN	United Nations
UNFCCC	United Nations Framework Convention on Climate Change
WAM	With Additional Measures
WEDS	Wind Energy Development Strategy
WEM	With Existing Measures
WFD	Water Framework Directive
WGS	World Geodetic System
WMO	World Meteorological Organization

2. BACKGROUND TO THE PROPOSED PROJECT

2.1 Introduction

This Chapter of the Environmental Impact Assessment Report (EIAR) presents an overview of the legislative and policy context for the Killoshulan Wind Farm, referred to as the 'Proposed Project', which is being brought forward in response to local, regional, national and European policy objectives and targets relating to Ireland's transition to a low-carbon economy, associated climate change policy objectives and the need to reduce Ireland's dependence on imported fossil fuels for the production of electricity. **Section 1.5** of **Chapter 1** of this EIAR provides further information on the need for the Proposed Project.

This Chapter, together with the Planning Report which accompanies the planning application, demonstrates how the Proposed Project is consistent with all relevant planning, renewable energy and climate change policies and targets at the local, regional, national and European level and with the proper planning and sustainable development of the Site.

This Chapter details the relevant planning history of the Site and identifies other wind energy developments within the wider area. This Chapter also summarises the EIAR scoping exercise, the pre-planning and community consultation undertaken and the cumulative impact assessment process.

As detailed in **Section 1.1.1** of **Chapter 1** of this EIAR, the various project components are described and assessed using the following references: 'Proposed Project', 'Proposed Wind Farm', 'Proposed Grid Connection' and 'the Site'. A detailed description of the Proposed Project is provided in **Chapter 4** of this EIAR.

2.1.1 Statement of Authority

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

This Chapter was led by Francesca Rowson with support from Mike Amiel Mekell and Iga Galaszewska.

Francesca Rowson is a Senior Planner with MKO with over 12 years post-qualification experience as a town planning consultant. Francesca holds a Master's Degree (M.Plan) in Town and Regional Planning from the University of Sheffield and is a chartered member of the of the Royal Town Planning Institute. Francesca previously worked as a Planning Manager in KPMG Future Analytics in Ireland and prior to this, she worked for Stantec in the UK as a Principal Planner. Francesca's key areas of expertise lay in development management processes, formulation of planning and engagement strategies and project management including preparation and coordination of Environmental Impact Assessment Reports. Francesca has extensive experience of managing planning application and development consent processes for a wide range of projects including infrastructure, residential and commercial development schemes in Ireland and the UK. Within MKO, Francesca manages a portfolio of renewable energy and infrastructure projects with responsibility for coordinating pre-planning, planning application and appeal submissions to ACP and Local Authorities.

Mike Amiel Mekell is a Planner with MKO with over 3 years of experience in private practice. Mike holds a Bachelor of Arts (Hons) degree in Politics, International Relations and Sociology from University College Dubin and a Master of Science degree in Planning and Development from Queen's

University Belfast. He is a Licentiate of the Royal Town Planning Institute. Prior to taking up his position with MKO, Mike worked as a Graduate Environmental Planner with Roughan and O'Donovan. In this role he prepared Environmental Impact Assessment Screening and Scoping reports, environmental monitoring and management reports, and planning reports for projects involving public and active transport infrastructure, and sustainable tourism development. Since joining MKO, Mike has been involved in a range of renewable energy projects including onshore wind, solar, battery energy storage and grid infrastructure developments. His main responsibilities include preparing planning application documents and reports, preparing inputs for Environmental Impact Assessment Reports and liaising with multidisciplinary project teams.

Iga Galaszewska is a Planner with MKO and joined the company in June 2026. Iga holds a Master's degree in Regional and Urban Planning and a Bachelor of Arts degree in City Planning and Environmental Policy, both from University College Dublin. Prior to taking up her position with MKO, Iga worked as an Assistant Planner with DOWNEY Planning and Architecture, where she assisted with the preparation, coordination and submission of planning applications across urban and rural areas. Her main responsibilities include preparing various applications for planning consent under the Planning and Development Act 2000 (as amended), including the preparation of feasibility studies, pre-planning reports, planning reports, social & community infrastructure audits, additional information requests and appeals. Iga holds licentiate and graduate memberships of both the Irish Planning Institute and the Royal Town Planning Institute.

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.

There is an urgency to ensure that real changes occur without delay, which means that a gradual shift towards increasing Ireland's use of renewable energy is no longer viable. 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 import of fossil fuels to meet its energy needs. In 2023, over 81% of Ireland's energy was imported from abroad, higher than the European Union (EU) average of almost 60% (National Energy Security Framework, 2022). 2024 saw a 55% increase in imported electricity relative to 2023[1]. This high dependency on energy imports is high risk, 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 improving energy security in Ireland.

2.1.3 Need for the Proposed Project

Section 1.5 of **Chapter 1** of this EIAR the details the need for the Proposed Project which is being brought forward in response to policy objectives that support Ireland's transition to a low-carbon economy, require compliance with specific climate change targets and aim to reduce Ireland's dependence on imported fossil fuels for electricity production by developing indigenous renewable energy generation such as wind energy.

Ireland's Climate Action Plan 2025 sets ambitious yet essential targets for renewable energy, including 9GW of onshore wind capacity –with at least 6GW to be delivered by 2025– and an 80% share of

[1] *Environmental Protection Agency, 'Press release: Ireland's power generation and industrial greenhouse gas emissions down by seven per cent in 2024'. https://www.epa.ie/news-releases/news-releases-2025/irelands-power-generation-and-industrial-greenhousegas-emissions-down-by-seven-per-cent-in-2024--.php*

renewable electricity by 2030[2]. However, multiple assessments, including the Climate Change Advisory Council (CCAC) Annual Review 2025[3] and the Environmental Protection Agency (EPA) emissions projections[4], 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 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 1.5** 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's (IPCC) Sixth Assessment Report[5] 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 Report[6] of the IPCC's 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 Report 2025' published in March 2026[7], atmospheric concentration of carbon dioxide reached its highest level in the last 2 million years. Levels of methane and nitrous oxide reached their highest levels in the last 800,000 years in 2025. The year 2025 was the second or third warmest year in the 176-year observational record, depending on which of nine datasets is used. The year 2024 remains the warmest year in all the datasets, at 1.55 °C ± 0.13 °C above the 1850–1900 average[8].

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[2] *Climate Action Plan 2025* https://assets.gov.ie/static/documents/Climate_Action_Plan_2025_updated_cover.pdf
[3] *CCAC Annual Review 2025 - Our Changing Climate in 2024* https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC%20AR25%20Our%20Changing%20Climate-final.pdf
[4] *EPA press releases for 2025* https://www.epa.ie/news-releases/news-releases-2025/epa-projections-show-ireland-off-track-for-2030-climate-targets.php
[5] *Climate Change 2021 'The Physical Science Basis' (Intergovernmental Panel on Climate Change, August 2021)*
[6] *Climate Change 2023 Synthesis Report (IPPC)* https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_FullVolume.pdf
[7] *State of the Global Climate 2025 (World Meteorological Organisation, March 2026)* https://wmo.int/publication-series/state-of-global-climate/state-of-global-climate-2025
[8] *State of the Global Climate 2025 (World Meteorological Organisation, March 2026)* https://wmo.int/publication-series/state-of-global-climate/state-of-global-climate-2025

"The European State of the Climate Report 2025" produced by WMO and European Union[9] indicated that:

- The current level of global warming is estimated to be around 1.4°C above the pre-industrial level.
- Europe 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 largest contributions came from fires across the Iberian Peninsula in August.
- The annual sea surface temperature for the European ocean region was the highest on record and a record 86% of the region experienced at least 'strong' marine heatwave conditions.
- Glaciers in all European regions saw a net mass loss. In 2025, the total global glacier mass loss was about 410 Gt, equivalent to 1.1 mm of sea level rise.
- 2025 saw strong regional contrasts in hydrological conditions. Storms and flooding affected some areas, but overall extreme precipitation and flooding were less widespread than in recent years.

The *"Annual Climate Statement for 2025"* produced by MET Eireann[10], similarly reflects on impacts arising from climate change effects within an Irish context:

- The average annual air temperature for Ireland in 2025 *(using the Island of Ireland dataset*)* 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.
- This makes 2025 the second warmest year on record, which is only slightly behind the warmest year in 2023 (11.21 °C) and only the second time with a mean temperature over 11 °C.
- The last 4 years (2022-2025) are now the 4 warmest years on record with 2024 tying 2007 for 4th warmest, and seven of the top ten warmest years have occurred since 2005.
- Provisional rainfall data suggests 2025 was the 15th wettest year since 1941 with 104% of the 1991-2020 LTA, with an 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 Change Policy

United Nations Framework Convention on Climate Change

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

[9] *The European State of the Climate Report 2025 (World Meteorological Organization and European Union, April 2026) https://wmo.int/resources/publication-series/state-of-climate-europe/european-state-of-climate-2025*
[10] *Annual Climate Statement for 2025 (MET Eireann, January 2026) https://www.met.ie/annual-climate-statement-for-2025*

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 which moved to extend the Kyoto Protocol's commitments until 2020, and includes:

- New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from 1st January 2013 to 31st December 2020;
- A revised list of GHGs 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 EU) that have ratified the Convention in a different country, to evaluate its implementation and negotiate new commitments. COP21 was organised by the United Nations (UN) and held, in Paris, from 30th November to 12th December 2015. COP21 closed with the adoption of the first international climate agreement (concluded by 195 countries and applicable to all). The 12-page text, made up of a preamble and 29 articles, provides for a limitation of the global average temperature rise to well below 2°C above pre-industrial levels and to limit the increase to 1.5°C. It is flexible and takes into account the needs and capacities of each country. The IPCC's Sixth Assessment Report (2021), outlined above, 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 of October 2018 titled *'Global Warming 1.5°C'*, notes the impacts of global warming of 1.5°C above pre-industrial levels and related global GHG emission pathways; in the context of mitigation pathways, strengthening of the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty. This special report is part of an invitation contained in the decision of the 21st session of the COP of the UNFCCC to adopt the Paris Agreement and provides an update on the impact of climate change if emissions are not reduced.

COP25 Madrid

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

COP26 Glasgow

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

The key items COP26 seeks to achieve are:

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

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

- *"Over 40 leaders joined the Breakthrough Agenda, a 10-year plan to work together to create green jobs and growth globally, making clean technologies and solutions the most affordable, accessible and attractive option before 2030 – beginning with power, road transport, steel, hydrogen and agriculture*
- *Over 120 countries covering more than 90% of the world's forests endorsed the Glasgow Leaders' Declaration on Forests & Land Use committing to work collectively to halt and reverse forest loss and land degradation by 2030, backed by the biggest ever commitment of public funds for forest conservation and a global roadmap to make 75% of forest commodity supply chains sustainable.*
- *A Just Energy Transition Partnership was announced to support South Africa's decarbonisation efforts; a powerful example of collaboration between an emerging economy and international partners.*
- *The launch of the Global Methane Pledge saw over 100 countries committing collectively to reduce global methane emissions by 30% by 2030."*

COP27 Sharm el-Sheikh

COP27 took place in Sharm el-Sheikh, Egypt from the 6th to the 20th of November 2022. COP27 centred around three major topics:

- Closing the emissions gap to keep the 1.5°C goal 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 COP27 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. It gives key political signals that the phase down of all fossil fuels is happening.
- **Climate Finance & Loss and Damage:** An initiative known as the Global Shield Against Climate Risk (GSACR) was launched by the V20[11] and G7[12]. The intention of this initiative has been framed 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.

[11] *Vulnerable Twenty Group countries*
[12] *Group of Seven countries*

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 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 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 GHG 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 Proposed Project).*

The European Climate Law[13] writes into law the objectives set out above in the European Green Deal for Europe's economy and society to become climate-neutral by 2050. Climate neutrality by 2050 means achieving net zero GHG emissions for EU countries as a whole, mainly by cutting emissions, investing in green technologies and protecting the natural environment. The European Climate Law includes:

- A legal objective for the EU to reach climate neutrality by 2050;
- An ambitious 2030 climate target of at least 55% reduction of net emissions of GHGs as compared to 1990, with clarity on the contribution of emission reductions and removals;
- A process for setting a 2040 climate target, taking into account an indicative GHG budget for 2030-2050 to be published by the Commission;
- A commitment to negative emissions after 2050;
- The establishment of European Scientific Advisory Board on Climate Change, that will provide independent scientific advice;
- Stronger provisions on adaptation to climate change; and
- Strong coherence across EU 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 proposals[14] to make the EU's climate, energy, transport and taxation policies fit for reducing net GHG emissions by at least 55% by 2030, compared to 1990 levels.

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

[13] *European Climate Law was published in the Official Journal on 9th July 2021 and came into force on 29th July 2021*
[14] *'Fit for 55': delivering the EU's 2030 Climate Target on the way to climate neutrality (July 2021)*

Regulation (EU) 2026/667

Regulation (EU) 2026/667 of the European Parliament and the Council was adopted on the 11th of March 2026. The Regulation amends Regulation (EU) 2021/1119 with regard to the setting of an EU intermediate climate target for 2040.

Considering the scientific advice of the European Scientific Board on Climate Change and a detailed impact assessment, the Regulation sets a legally binding intermediate climate target of a 90% reduction in GHG emissions by 2040, compared to 1990 levels.

The Regulation supports the European Climate Law's objective of climate neutrality by 2050. The Proposed Project by generating and providing renewable energy to the national electricity grid, will support the decarbonisation of the electricity sector, which will support the decarbonisation of other sectors. The Proposed Project by reducing reliance on GHG emitting fossil fuels will support the achievement of a 90% reduction in GHG emissions by 2040 (relative to 1990 levels) and climate neutrality by 2050.

2.2.1.2 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 move 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, European Climate Law and Regulation (EU) 2026/667, which also aim to reduce carbon emissions and achieve net zero carbon emissions by 2050. These goals are not likely to 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 vulnerability to price fluctuations and geopolitical risks associated with fossil fuel imports.

2.2.2 National Climate Change Policy

Programme for Government – Securing's 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 will be 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's ongoing support and commitment to take *"the necessary action to deliver at least 70% renewable electricity by 2030"*. This target has been updated by subsequent Climate Action Plans.

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

The Climate Action and Low Carbon Development Act 2015 (as amended) ('the Climate Act') establishes a legislative precedent to reduce Ireland's carbon emissions. The Climate Act legally binds Ireland to achieve net zero emissions no later than 2050, and to a 51% reduction in emissions by the end of this decade.

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

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

The National Climate Policies and Objectives all support the Proposed Project, and by implication the consenting, subject to proper planning, of renewable energy developments.

Obligations under the Climate Act and the Planning Act

Section 15(1) of the Climate Act provides that:

> *"A relevant body shall, in so far as practicable, perform its functions in a manner consistent with—*
> - *the most recent approved climate action plan,*
> - *the most recent approved national long-term climate action strategy,*
> - *the most recent approved national adaptation framework and approved sectoral adaptation plans,*
> - *the furtherance of the national climate objective, and*
> - *the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State." (the "National Climate Policies and Objectives")*

The National Climate Policies and Objectives listed in Section 15, with which ACP decisions must be consistent, all support the development of onshore wind energy in accordance with proper planning and sustainable development.

The implications for public bodies (which include Planning Authorities) in exercising their functions in accordance with Section 15 of the Climate Act has been scrutinised by the Irish legal system. The legal analysis of Section 15 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 the 4th February 2026 (Coolglass Wind Farm Limited v An Bord Pleanála [2026] IESC 5) which establishes that consenting authorities must make

decisions in a manner '*consistent with*' the approved national long term climate action strategy, approved national long term climate action strategy etc., '*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 (including ACP), in making a decision on applications for renewable energy developments (such as the Proposed Project), 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.

The Proposed Project is a renewable energy development, with an estimated capacity of 62 megawatts (MW). For this reason, it is clear that the Proposed Project, if granted, would contribute to national climate objectives and targets. There are no mandatory and non-fixable legal requirements that prevent the Planning Authorities from reaching an outcome, in relation to the Proposed Project, that favours policy goals, i.e. granting permission.

Carbon Budgets

To achieve the 51% emissions reduction target, the Climate Act, requires the 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 budgets from 2021 to 2035: Carbon Budget 1 (2021–2025) of 295 Mt CO_2eq, Carbon Budget 2 (2026–2030) of 200 Mt CO_2eq and a provisional Carbon Budget 3 (2031–2035) of 151 Mt CO_2eq[15].

In December 2024, the CCAC published its *Carbon Budget Proposal Report 2024*, proposing a finalised Carbon Budget 3 (2031–2035) of 160 Mt CO_2eq and a provisional Carbon Budget 4 (2036–2040) of 120 Mt CO_2eq. The CCAC calculates that consistency with the existing and proposed budgets requires emissions reductions equivalent to an average annual reduction of 6.3% over the period 2024–2040, delivering reductions of 56% by 2035 and 68% by 2040 relative to 2018.

At the time of writing, the proposed finalised Carbon Budget 3 of 160 Mt CO_2eq and provisional Carbon Budget 4 of 120 Mt CO_2eq have been considered by the Joint Committee on Climate, Environment and Energy but have not completed the statutory Oireachtas approval process.

The total emissions allowed under each budget are shown in Table 2-1 below.

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

	2021 – 2025 Carbon Budget 1	**2026 – 2030 Carbon Budget 2**	**2031 – 2035 Provisional Carbon Budget 3**
	All Gases		
Carbon Budget (Mt CO2eq)	295	200	151

[15] *Carbon Budget Technical Report (Climate Change Advisory Council, October 2021)* https://www.climatecouncil.ie/media/climatechangeadvisorycouncil/Technical%20report%20on%20carbon%20budgets%2025.10.2021.pdf

	2021 – 2025 Carbon Budget 1	2026 – 2030 Carbon Budget 2	2031 – 2035 Provisional Carbon Budget 3
Annual Average Percentage Change in Emissions	-4.8%	-8.3%	-3.5%
The Figures are consistent with emissions in 2018 of 68.3 Mt CO2eq reducing to 33.5 Mt CO2eq in 2030, thus allowing compliance with the 51% emissions reduction target by 2030.			

Section 6C of the Climate Act provides that the Minister shall prepare, within the limits of the carbon budget, the Sectoral Emissions Ceilings. These ceilings set out the maximum amount of GHG emissions that are permitted in each sector. The Government approved Sectoral Emissions Ceilings on 28 July 2022. The electricity sector is allocated a sectoral ceiling of **40 MtCO2eq** for the first budget (2021-2025) and a sectoral ceiling of **20 MtCO2eq** for the second budget period (2026-2030).

The EPA's *Ireland's Provisional Greenhouse Gas Emissions 1990–2025*[16], published in July 2026 indicates that the first carbon budget was provisionally met. Cumulative emissions for the period 2021–2025 were 293.9 Mt CO_2eq, approximately 1.1 Mt CO_2eq below the 295 Mt CO_2eq carbon budget. Emissions from the electricity sector fell by 7.1% in 2025 to 6.59 Mt CO_2eq, with the EPA reporting that the Energy Industries sector met its Sectoral Emissions Ceiling for the first budget period.

The EPA reported in May 2026[17] that the second carbon budget (2026-2030) – which aims to support the achievement of the 51% emissions reduction target - would not be met. Current projections indicate that Ireland will only achieve a 13% reduction on 2018 levels by 2030 under the 'With Existing Measures (WEM)' scenario and a 25% reduction under the 'With Additional Measures (WAM)' scenario.

Section 6D, paragraph 5, of the Climate Act states that non-achievement of a carbon budget would see the excess emissions carried forward into the second budget period and that second carbon budget would be reduced by that amount. As the first carbon budget has been provisionally met, with the WEM scenario exceeding the budget by 0.4 Mt CO2eq, while the WAM scenario projects emission will be 1.8 Mt CO2eq under budget, no exceedance is currently expected to be carried forward into the second budget period. Notwithstanding this, the EPA projects that the second carbon budget will be exceeded by approximately 81 Mt CO_2eq under the WEM scenario and 53 Mt CO_2eq under the WAM scenario[18]. Accordingly, substantially greater emissions reductions will be required during the second carbon budget period to remain within the 200 Mt CO_2eq budget and progress towards achievement of the 51% emissions reduction target.

The Proposed Project is of critical importance as it contributes significant additional renewable energy capacity. Decarbonising the electricity sector is crucial to not just the electricity sectors carbon reductions but other sectors too, such as transport and heating, which rely on carbon emission reductions by electrification.

The Proposed Project will provide **carbon savings of c. 989,687 tonnes** over the proposed 35-year lifetime of the wind farm as detailed in **Chapter 11** and will directly support the reduction in emissions

[16] *Ireland's Provisional Greenhouse Gas Emissions 1990–2025 (EPA, July 2026).* https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA-Provisional-GHG-Emissions-1990-2025-web.pdf
[17] *Ireland's Greenhouse Gas Emissions Projections 2025–2030 (EPA, May 2026).* https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA-GHG-Projections-2025-2030-Web.pdf
[18] *Ireland's Greenhouse Gas Emissions Projections 2025–2030 (EPA, May 2026)* https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA-GHG-Projections-2025-2030-Web.pdf

from the electricity sector and will facilitate emissions reductions across society and all sectors of the economy through the increased supply of renewable energy.

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 a concern that Ireland's performance in meeting international and national obligations was inadequate, and concerns remained regarding emission projections and the ability to meet 2030 targets under relevant EU Directives.

The report states that a 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 its electricity generation. Therefore, there is a clear incentive for developing, and safeguarding, Ireland's capacity in renewable energies and renewable electricity. Since this report was published, the Climate Act has been enacted and there have been recent progress / future scenario assessments (e.g., EirGrid's 'All Island Generation Capacity Statement 2022 – 2031' (October 2022)).

Given the clear concern that the county's future emissions targets may be missed, it is crucial that projects, such as the 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 are constructed.

Climate Action Plan 2023

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

A target aims for a reduction in emissions of 51% over the period 2018 to 2030 and, in doing so, to prevent/ mitigate the potentially devastating consequences of climate change on Ireland's environment, society, economy and natural resources. CAP23 states that to do so, Ireland must harness the untapped indigenous renewable resources and has a target of achieving 80% of energy being produced from renewable sources by 2030 (unchanged from the previous Climate Action Plan, 2022) with a target of 9GW of that being produced by onshore wind. Measures set out in CAP23 to achieve these targets include to *'accelerate and increase the deployment of renewable energy to replace fossil fuels'* (Section 12.1.4 of CAP23). It is clear from the message and ambition of CAP23 that the drive to deploy renewable energy projects such as the Proposed Project in Ireland are critical to achieving the aims and objectives of CAP23 including the 9GW of onshore wind energy by 2030 and carbon neutrality by 2050.

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

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

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

Chapter 12 of CAP23 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 the central role of the electricity sector in achieving sector wide targets, the electricity sector has been allocated the smallest carbon budget and will require the steepest carbon emissions decline of all sectors – namely a reduction in carbon emission by -75% relative to 2018 baseline. Carbon budgets 1 and 2 allow for 40.02 MtCO2eq from the electricity sector up to 2025 and 20 MtCO2eq from 2026-2030. This means an average of 8 MtCO2eq per annum. Emissions for the period 2021 were 9.98 MtCO2eq, which is in exceedance of 8 MtCO2eq, which means that to keep on track, electricity will now have to achieve annual emissions of c. 7.5 MtCO2eq from 2022 to 2025. The measures set out for electricity sector include *inter alia*:

- Reduce annual CO2eq. emissions from the sector to 3 MtCO2eq by 2030 (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 6 GW of onshore wind and up to 5 GW of solar by 2025;
- Target 9 GW onshore wind, 8 GW Solar and at least 5 GW of offshore wind by 2030;
- Align the relevant constituent elements of the planning and permitting system to support accelerated renewable energy development, supported by national policy and associated methodologies to inform regional and local planning policies, noting that county development plans are obliged to set out objectives to facilitate energy infrastructure.

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

CAP24 includes the latest trends in the electricity sector:

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

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

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

The scale of the challenge is apparent when quantified:

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

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

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

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 (CAP25) represents the third statutory update to Ireland's climate roadmap under the Climate Act. Building on the foundations laid by previous plans, CAP25 refines and strengthens the strategies necessary to deliver Ireland's legally binding carbon budgets and sectoral emissions ceilings. It sets out a well-defined course of action to reduce GHG emissions by 51% by 2030 and to achieve climate neutrality no later than 2050.

A cornerstone of CAP25 is the decarbonisation of Ireland's electricity system through a substantial increase in renewable energy generation. The plan reaffirms ambitious targets for renewable electricity share which includes 80% by 2030, and 50% by 2025. This is to be achieved through the accelerated deployment of onshore wind (6GW by 2025; 9GW by 2030), offshore wind (at least 5GW by 2030), and solar energy (up to 5GW by 2025; 8GW by 2030).

CAP25 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."*

CAP25 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."*

CAP25 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.

2.2.2.2 Project Compliance with National Climate Policy

The Proposed Project aligns with the national climate policy objectives. The Proposed Project will make a significant contribution to achieving the CAP25 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. Currently, the electricity sector is rapidly approaching the designated sectoral ceiling of 20 $MtCO_2eq$ for the second carbon budget period from 2026 to 2030. The national renewable energy targets and the carbon budgets are integral to the government's response to the climate crisis.

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

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 26.2% in 2025[19]. Of the 27 EU member states, the lowest proportions of renewable energy generation was 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.

[19] *European Commission (2026) Renewable Energy Directive. Available at: https://energy.ec.europa.eu/topics/renewable-energy/renewable-energy-directive-targets-and-rules/renewable-energy-directive_en?prefLang=mt&utm_source=chatgpt.com*

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 Directive[20] (RED III), came into force. RED III increases the EU wide renewable energy target from 32% set under the previous revision of the directive to 42.5%, with an ambition to reach 45% by 2030. The increase was proposed under the publication of REPowerEU plan in May 2022. RED III 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.

Central to RED III 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 ending 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

[20] *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)*

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.

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 (RED III). The updates including raising the share of renewables in the EU's final energy consumption to 42.5% by 2030 with Member States encouraged to achieve 45% and a more efficient approval procedure for deploying renewables in Europe. In addition, as a part of the REPowerEU Plan, the European Commission has proposed a series of additional targeted amendments to the renewable energy directive to reflect the

ongoing changes in the energy landscape and the continued invasion of Ukraine. This will make the sector more efficient and reach the set goals faster.

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

AccelerateEU

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.

The two pillars relevant to the Proposed Project relate to increasing indigenous renewable energy and improving our energy system. The Proposed Project which is an indigenous renewable wind energy development with a Proposed 110kV Substation that will produce and increase Irelands renewable energy capacity and will provide a new substation which will connect to the national electricity grid.

2.3.1.2 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 RED III and the REPowerEU Plan 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

On 12th 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 then Department of Communications, Climate Action & Environment (DCCAE) 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. It states:

> *"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

The National Energy Security Framework (DECC, April 2022) highlights clearly the impacts the Russian invasion of Ukraine and the resulting war has had on Europe's energy system. The resulting decision by the European Union to phase out the import of Russian gas, oil and coal (REPowerEU) 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 Sustainable Energy Authority of Ireland's (SEAI) Energy in Ireland (2025) report, oil accounted for 49% of Ireland's primary energy requirement in 2024, making it one of the highest rates of oil dependency in the EU. The International Energy Agency (IEA), of which Ireland is a member country, includes a 10-point plan to cut oil use which calls for an acceleration in the deployment of wind and solar projects. Ireland's response per the Framework is set out over three themes:

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

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

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

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

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

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

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

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

Independent research undertaken as part of the package, McCarthy Report[21], 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 measures most relevant to the Proposed Project is Action 10 which is *"To implement Planning and Consenting System Reforms and provide greater certainty to the sector"*.

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

The Proposed Project will directly support the government's goal of enhancing national energy security by acting as a domestic source of renewable electricity. By supplying clean energy to the national grid, it will contribute to the transition toward a renewables-driven energy system.

2.3.2.2 Project Compliance with the 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

[21] *McCarthy, D. (2023) Independent Review on the Security of Electricity Supply. Available at:* https://assets.gov.ie/static/documents/annex-5-independent-review-on-the-security-of-electricity-supply-mccarthy-report.pdf

At a European level, the latest data shows that, as of 2025, 26.2% of energy came from renewable energy sources[22]. This represents an increase of 1% compared to 2024 levels. While progress is being made to increase the share of renewable energy, it is clear that all EU member states need to intensify their efforts to collectively comply with the target of 42.5% set in the latest revision of the renewable energy directive.

Of the 27 EU member states, Ireland had one of the lowest proportions of renewable energy at 17.2% in 2025[23]. 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 41.7% in 2025, but still below the EU average of 49.9%[24].

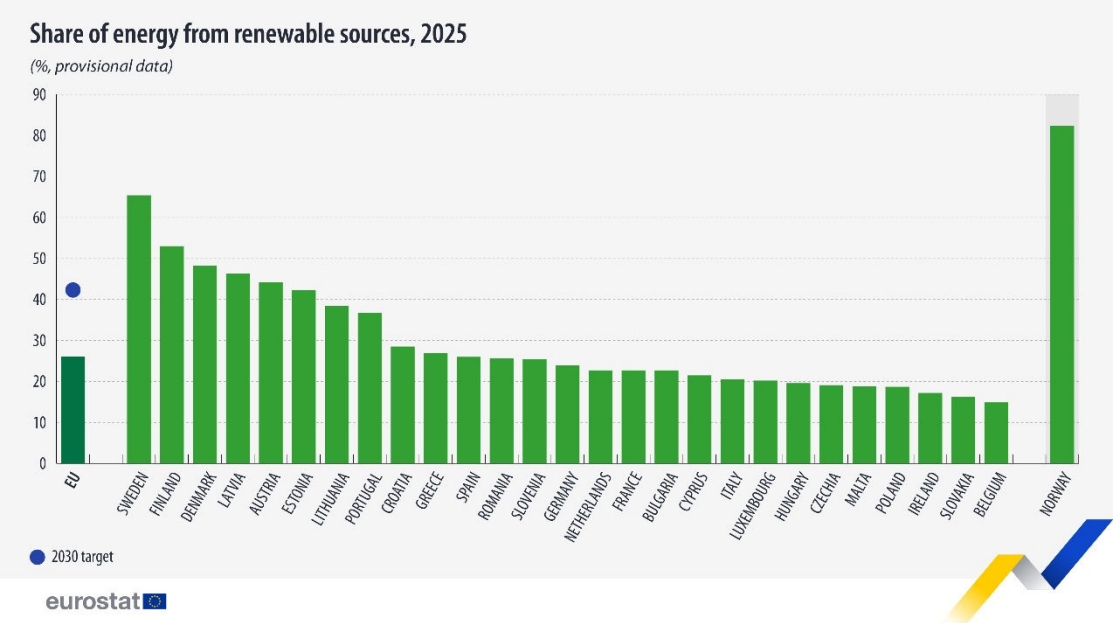


Figure 2-1: Overall share of energy from renewable sources (source: Eurostat)

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 2025-2030'* in May 2026[25]. 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 2024. 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

[22] *Renewable Energy Statistics (Eurostat, July 2026)* https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Renewable_energy_statistics
[23] *Eurostat (2026) Renewables make up 26% of EU energy use. Available at:* https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20260723-1
[24] *Eurostat (2026) Renewable energy statistics. Available at:* https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Renewable_energy_statistics
[25] *Ireland's Greenhouse Gas Emissions Projections 2025-2030 (Environmental Protection Agency, May 2026)* https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA-GHG-Projections-2025-2030-Web.pdf

measures (at the time the Projections are compiled) to reduce emissions such as those in Ireland's CAP25.

The EPA Emission Projections Update notes the following key trends:

- Ireland is not on track to meet the 51% emissions reduction target by 2030 (compared to 2018). Full implementation of a wide range of policies and plans across all sectors that deliver carbon savings is required to achieve a projected reduction of 25%.
- Budget period 1 (2021-2025) of 295 Mt CO_2eq is projected to be largely met, with the WEM scenario exceeding the budget by 0.4 Mt CO_2eq, while the WAM scenario projects emission will be 1.8 Mt CO_2eq under budget. With carryover from Budget period 1, Budget period 2 (2026-2030) of 200 Mt CO_2eq is expected to be exceeded by 53 to 81 Mt CO_2eq.
- Of seven sectors with legally binding Sectoral Emission Ceilings, three are projected to remain below their Ceiling in Budget Period 1 (Electricity, Residential Buildings, 'Other'), and only the 'Other' Sector (Waste, F-gas, Petroleum Refining) will remain below its Ceiling in Budget Period 2.
- Ireland is not projected to meet its EU target under the Effort Sharing Regulation of a 42% emissions reduction by 2030 (compared to 2005) even with flexibilities applied. This assessment shows that greenhouse gas emissions will be reduced by 13 to 23% by 2030 without the use of flexibilities, and by 17 to 27% with the use of flexibilities.
- From 10.2 Mt CO_2eq in 2018, emissions from the Energy Industries sector are projected to decrease to between 4.0 and 4.7 Mt CO_2eq in 2030 (a 61% reduction in WAM and 55% decrease in WEM). These projections include greater electricity demand and delays in the delivery of both increased interconnection and offshore wind 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 (October 2026)

The National Energy Projections report, published by the SEAI in October 2026, sets out the most recent updates to Ireland's progress towards its binding European and national renewable energy targets.

In 2018, RED II set an EU wide target for overall RES of 32% RES in 2030. Member states set their national contributions to the EU-wide target, with Ireland setting its at 34.1% in 2030. RED III increased the binding EU-wide target for overall RES to at least 42.5% with Ireland subsequently increasing the target to 43% in 2030.

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

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

Ireland is also projected to fall short of the 2030 renewable-energy share target of 43% under RED III, reaching just 28.5% in the WAM scenario and 25.1% in the WEM scenario. This is stated to be due to delays in deployment of renewables combined with growth in overall energy consumption.

The report states that *"In addition to significant compliance costs, failure to meet these targets carries material risks to energy security and affordability"* and that *"Increasing domestic renewable generation is essential for insulating against global price shocks, but rising demand means ever-greater renewable capacity is required to displace imported fuels."*

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

The Report projects GHG emissions under the WEM and WAM scenarios. In the WEM scenario, total GHG emissions are expected to exceed the carbon budgets for CB1, CB2 and provisional CB3 in 2025, 2029 and 2032, respectively, with a cumulative exceedance of 16% by the end of 2030. In the WAM scenario, cumulative exceedance of 10% is projected by the end of 2030. The projected overall carbon budgets exceedance has reduced from the 2025 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 (October 2026)

In October 2026, the SEAI released an annual publication '*Energy in Ireland'* report (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 Energy in Ireland Report identifies that Ireland's national energy-related emissions in 2025 were at their lowest level in over 30 years. Energy-related emissions in 2025 were 29.8MtCO_2eq, down 3.6% on 2024 levels. Electricity-related emissions were 6.3MtCO_2eq in 2025 the lowest on record, down 8.5% from 2024 levels. The following are some of the key points, relating to renewable energy and energy emissions:

- 16% of Ireland's primary energy was renewable in 2025, the highest value to date.
- Ireland used 1.84 TWh more renewable energy in 2025 than in 2024.
- Just under three-quarters of renewable energy in 2025 came from wind, biodiesel, and biomass.
- In 2025, Ireland's RES-Overall result was 17.3%, up from 16.1% in 2024 – the highest value to date.
- Ireland's RES-Overall result was 10.3 percentage points behind its 27.6% milestone target in 2025.
- Gas (40.0%), wind (32.1%), and net imports (16.3%) led Ireland's gross electricity supply in 2025.

Ireland's installed wind capacity in 2025 was 5.10 GW, which indicates a 3.3% increase from the previous year. Ireland's 2025 CAP target for installed wind capacity is 6 GW, and its 2030 CAP targets for onshore and offshore capacity are 9 GW and 5 GW, respectively. SEAI's projections under the WAM scenario indicate a total installed capacity of 8.5 GW by the end of 2030. This WAM scenario is the most optimistic reporting scenario modelled, achieving 59% RES-E by 2030.

The Energy in Ireland 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 2-2 from the Energy in Ireland Report copied below, illustrates the year-on-year increase in installed wind capacity required to align to the pace of the WAM.

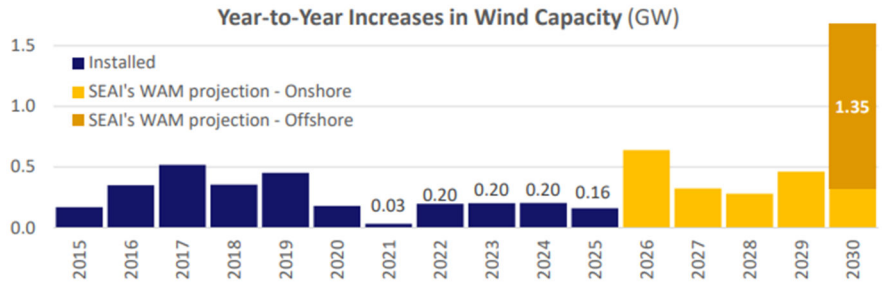


Figure 2-2: Year-to-year increases in installed wind capacity to 2025, and year-to-year increases in WAM capacity projections of capacity from 2025 to 2030

The Energy in Ireland Report also identifies a plateauing of wind generation, which is the largest contributor to renewable electricity, over the last 5 years. Annual wind generation over the last 4 years has been relatively level, increasing by just 5.6% from 2022 to 2025. 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'[26] quite starkly,

> *"1. Ireland remains substantially off track in meeting its EU and national emissions reduction targets, with progress in the Agriculture and Transport sectors, which collectively account for approximately 55% of Irish emissions, proving particularly slow. The Government is urged to move from ambitious statements to implementing impactful and demonstrable actions that build momentum and public buy-in.*
>
> *2. Failure to meet targets will potentially result in substantial compliance costs, estimated to be in the range of €8–26 billion, and a colossal missed opportunity to invest in Irish households, communities and businesses – creating jobs, improving health and wellbeing, and protecting the most vulnerable in society."*

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

The Climate Change Advisory Council Annual Review 2025 – Electricity

The CCAC published its annual review in April 2025 where it outlines detailed observations and recommendations for the Electricity sector in Ireland. This review emphasises the urgent need for

[26] *Climate Change Advisory Council (2025) Annual Review 2025 – Summary for All. Available at: https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR-2025-SfA-final.pdf*

Ireland to accelerate its transition to renewable energy to meet its 2030 electricity capacity targets and adhere to sectoral emissions ceilings. The CCAC states:

> *"To meet the carbon budgets, emissions from the Electricity sector will need to reach zero by the end of the 2030s. In 2024, electricity emissions fell by approximately 7% relative to 2023, reaching the lowest level since record-keeping began in 1990. This was driven by a continued decline in the use of coal for electricity generation, coupled with a notable rise in imported electricity for the second consecutive year. Renewable energy is still not being rolled out fast enough, and insufficient investment in the electricity grid means that some of the renewable energy we currently generate cannot be used. Emissions are currently projected to exceed the sectoral emissions ceiling, even in the most optimistic scenario."*

Key observations in relation to Renewable Electricity are outlined below:

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

The Climate Change Advisory Council Annual Review 2026

In March 2026 the CCAC published their 'Annual Review 2026: Our Changing Climate in 2025' which examines national and global climate data. The CCAC asserts that Ireland's climate is changing, with data indicating that 2025 was the second-warmest year on record. Key observations made by the CCAC in relation to GHG emissions are outlined below:

- *The levels of carbon dioxide, methane and nitrous oxide in the atmosphere have reached their highest points in recorded history. The record high concentrations are accelerating global warming and turbocharging more extreme weather events, which continued to have cascading impacts on lives, livelihoods, food systems and ecosystems around the world in 2025.*
- *The global average concentration of carbon dioxide increased by 3.5 parts per million between 2023 and 2024. This was the biggest annual increase since records began and was driven by the continued burning of fossil fuels and a spike in wildfires. Global efforts to reduce greenhouse gas emissions and enhance carbon removals are failing to materialise at the pace and scale needed to keep the Paris Agreement's temperature goal within reach. This underscores the need for sectors to plan for and address the risks of overshooting global temperature goals (e.g. higher warming scenarios exceeding 1.5˚C or 2˚C).*

The CCAC calls attention to the shortcomings in the global effort to reduce GHG emissions, stating that:

> *"Concentrations of major greenhouses gases – carbon dioxide, methane and nitrous oxide – have reached their highest ever recorded levels. Global emissions reduction efforts are failing, leading to continued warming and further increasing the likelihood and intensity of extreme events."*

The review by the CCAC provides a stark outlook on Ireland's changing climate, stating that "*the latest Irish climate change projections indicate further warming in the future*". The CCAC affirms that record high concentrations of GHG emissions in the atmosphere are accelerating global warming and extreme

weather events. It is also made apparent that efforts to reduce global GHG emissions are failing and that more action is needed to reduce GHG emissions. The Proposed Project, by producing and providing renewable wind energy to the national electricity grid will reduce Ireland's reliance of GHG emitting fossil fuels for energy generation, supporting the reduction in GHG emissions.

The Climate Change Advisory Council Annual Review 2026 – Electricity

The CCAC published its 'Annual Review 2026 – Electricity' 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 energy 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 renewable generation capacity being matched by increasing data centre electricity demand.*

The CCAC provides significant observations in relation to renewable energy, particularly that only 0.2 GW of wind energy capacity was added in 2025, if this trend is to continue Ireland will not achieve its 9GW onshore wind energy capacity target by 2030, as set out in CAP25. The Proposed Project provides an opportunity to generate and increase renewable wind energy capacity and will support with the achievement of CAP25 targets of 80% renewable energy share and 9GW onshore wind energy capacity by 2030.

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 Irelands Future
- Volume 4: Realising the Benefits of Transition and Transformation

The ICCA Synthesis Report states that having peaked in 2001, Ireland's GHG emissions have reduced in all sectors except agriculture. However, Ireland currently emits more GHGs per person than the EU average. The ICCA Synthesis Report goes on to state that there has been an identified gap in policy that indicates that Ireland will not meet its statutory GHG emission targets. Achieving net zero carbon

dioxide emissions by 2050 requires significant and unprecedented changes to Ireland's energy system. Policies tailored to suit different stages of technology development are critical for achieving a net zero energy system. Established technologies, such as wind energy, solar photovoltaics and bioenergy will be key in meeting short-term emission reduction targets (i.e. 2030), whereas offshore wind infrastructure is expected to be the backbone of future energy systems. This can only be achieved with appropriate support schemes, regulation and investments for synergistic growth of offshore wind and other renewable technologies.

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

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

2.5 Planning Policy Context

2.5.1 Introduction

This section of the EIAR provides the strategic planning context of the Proposed Project. 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

The Planning and Development Act 2000

The Planning and Development Act 2000 ('the 2000 Act') was signed into law by the President on the 28th August 2000. The 2000 Act revised and consolidated the law relating to planning and development by repealing and re-enacting with amendments the Local Government (Planning and Development) Acts, 1963 to 1999 and to provide, in the interests of the common good, for proper planning and sustainable development including the provision of housing.

As further detailed in Section 2.5.4.1 below, the Minister of State at the Department of the Housing, Local Government and Heritage, consequent to a recommendation made to him by the Office of the Planning Regulator (OPR) under Section 31AM(8) of the Act notified KCC of his intention to issue a

Direction to the KCCDP enclosing a Draft Ministerial Direction outlining the measures required to be taken by the planning authority in order to ensure that the plan is in compliance with the requirements of the 2000 Act and sets out an overall strategy for the proper planning and sustainable development of the area.

Section 31(6)(a) of the 2000 Act provides that where a part of a plan is referred to in such a notice then that part of the plan shall not have effect, it states:

"Notwithstanding section 12(17), 13(11) or 20(4A), a plan shall not have effect in accordance with those sections in relation to a matter contained in the plan which is referred to in a notice under subsection (3)."

Section 31(6)(b) of the 2000 Act provides that where a part of a plan is referred to in such a notice then the corresponding provisions in the previous plan shall not cease to have effect, it states:

'*If a part of a plan proposed to be replaced under section 12, 13 or 20 contains a matter that corresponds to any matter contained in that plan which is referred to in a notice under subsection (3), that part shall not, save where subsection (17) applies, cease to have effect in respect of that matter.'*

This matter is explored further in the context of the KCCDP subject to the Draft Ministerial Direction as it applies to the Proposed Project in Section 2.5.4.1 and 2.5.4.2 below.

The Planning and Development Act 2024

The Planning and Development Act 2024 ('the 2024 Planning Act') was signed into law by the President on the 17th of October 2024, following its passage through both Houses of the Oireachtas. However, the provisions of the 2000 Act continue to apply until such time as the replacement provisions of the 2024 Act are commenced by Ministerial Orders. The Government has approved an Implementation Plan for the 2024 Planning Act, published on the 4th of March 2025, which sets out the schedule for its phased commencement. Concurrently, work is ongoing to revise and update the supporting Regulations that will underpin the operation of the 2024 Planning Act. The full 2024 Act is expected to have been commenced by late 2026.

The planning application for the Proposed Project will account for the latest commenced provisions of the 2024 Planning Act at the time of submission.

National Planning Framework First Revision (April 2025)

The National Planning Framework (NPF), first published in February of 2018, forms the top tier of the national planning policy structure which establishes the policy context for the Regional Spatial and Economic Strategies (RSES) and local level development plans. It represents an effort to move away from a developer-led system to one informed by the needs and requirements of society up to 2040. The NPF, together with the National Development Plan 2021 (NDP), combine to form Project Ireland 2040, the overarching planning and investment framework for the social, economic and cultural development of Ireland.

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

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

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

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

Chapter 9: Climate Transition and Our Environment of the revised NPF 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**[27]**.**

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 carbon dioxide 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.*

[27] *National Planning Framework First Revision – April 2025* https://cdn.npf.ie/wp-content/uploads/National-Planning-Framework-First-Revision-April-2025-1.pdf

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.

2.5.2.2 Project Compliance with 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 its renewable energy and carbon emission reduction targets, the NPF recognises the need for increased renewable energy onto the national grid. This shift from fossil fuels is dependent upon projects such as the Proposed Project which will add c. 62 MW of renewable energy to Ireland's renewable energy capacity.

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 10 no. wind turbines, with an estimated electricity generation capacity of 62 MW, will considerably 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 Planning Policy

Southern Regional Assembly Regional Spatial & Economic Strategy

The Southern Regional Assembly (SRA) was established in 2015, 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 notes that planning policy and objectives must incorporate resilience and adaptability to ensure that the Region are agile and responsive to change. At present, Irish per capita Green House Gas (GHG) emissions are among the highest in Europe and the Government has identified '*Climate Change as the most important long-term challenge facing Ireland' with a stated commitment to 'the transformation required to achieve a low carbon resilient future'*. Transition to a low carbon energy future will require a wide range of policy responses across industry and public sectors, including electricity.

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 and climate change adaption.

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.

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 is open to, and ready to invest in, renewable energy generation:

- **RPO 219 (New Energy Infrastructure):** It is an objective to support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers (subject to appropriate environmental assessment and the planning process) to ensure the energy needs of future population and economic expansion within designated growth areas and across the Region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs.

- **RPO 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;
  c) 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.

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

2.5.3.2 Project Compliance with Regional Policy

The RSES supports the Southern Region as a Carbon Neutral Energy Region. At present, the RSES notes that the Region has more renewable energy generation than demand which indicates a strategic role for the region's energy assets in national energy generation and transmission with projected increases in population and economic growth, the demand for energy is set to increase in the coming

years. It is considered that the provision of the Proposed Project would facilitate this just transition and is particularly in line with the RPO as outlined above. 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 to be in line with Regional Policy.

2.5.4 Local Policy

The site falls within the administrative area of Kilkenny County Council (KCC) and therefore, is subject to the planning policies and objectives set out in the Kilkenny City and County Development Plan 2021-2027 (KCCDP).

2.5.4.1 Kilkenny City and County Development Plan 2021-2027

The Kilkenny City and County Development Plan 2021-2027 (KCCDP) came into effect on the 15th of October 2021. The KCCDP incorporates the aims, objectives, policies and guidelines to provide for the proper planning and sustainable development of County Kilkenny. KCC have made 10 no. Variations to the KCCDP. However, it should be noted that the Variations do not relate to the climate and renewable energy policies or objectives within the KCCDP (as varied).

The KCCDP (as varied) is the statutory county development plan in effect for the County and provides the framework against which all planning applications for development in the county are assessed. The policies and objectives set out within the KCCDP (as varied) have maintained strong linkages with the key aims and themes set out within the previous development plan. Climate change is again emphasised as one of the greatest global challenges, with KCC acknowledging that continual action is needed for Kilkenny to become a low carbon and climate resilient county.

The Planning Report submitted with this application contain a detailed planning assessment against all relevant policies, objectives and development management standards as set out in the KCCDP (as varied).

Draft Ministerial Direction

On the 15th October 2021, the Minister of State at the Department of the Housing, Local Government and Heritage, consequent to a recommendation made to him by the Office of the Planning Regulator (OPR) under Section 31AM(8) of the Act notified KCC of his intention to issue a Direction to the KCCDP. It states that:

> *"In accordance with Section 31(4) of the Planning and Development Act 2000, those parts of the Kilkenny City and County Development Plan 2021 – 2027 Plan referred to in the notice shall be taken not to have come into effect, been made or amended; namely;*
>
> *Chapter 11 Renewable Energy: Section 11.4 Kilkenny Targets, Section 11.5.1 Current status and targets and* ***Figure 11.4 Wind Strategy areas****." (emphasis added)*

The reason for the draft direction is as follows:

1. *"The Development Plan as made is inconsistent with Ministerial Guidelines issued under Section 28 of the Act, specifically item 2 of the Specific Planning Policy Requirement contained in the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (July 2017), which sets out the requirement for the Planning Authority to comply with the aforementioned Specific Planning Policy Requirement under section 28(1C). In particular, the Development Plan fails to identify renewable energy targets (in megawatts) which Kilkenny can contribute in delivering its share of overall government targets on renewable energy and climate change mitigation over the plan period.*

2. *The Development Plan contains conflicting objectives on renewable energy sustainable development and climate action such that the adopted Plan, without providing sufficient compensatory measures, significantly reduced the extent of the areas indicated as 'acceptable in principle' that were identified in the draft Development Plan as being necessary to achieve the* ***target of 201MW required to ensure that 100% of electricity demand for Kilkenny is met from renewable sources by 2030*** *and to ensure consistency with the Climate Action Plan.*
3. *The Development Plan has therefore not been made in a manner consistent with the recommendations of the Office of the Planning Regulator under Section 31 AM and fails to set out an overall strategy for the proper planning and sustainable development of the area."*

As the parts named above shall be taken not to have come in effect, the Wind Energy Strategy Areas and its associated policies in the KCCDP cannot be taken into account. The Proposed Project has been assessed in line with the relevant adopted policies of the KCCDP (as varied), and the corresponding provisions of the in the previous Kilkenny County Development Plan 2014-2020 (KCCDP 2014-2020) (as varied) as detailed in Section 2.5.4.2 below since there has been no conclusion the Minister's intervention in the KCCDP at time of writing.

Relevant Policies and Objectives

The KCCDP provides for the development of indigenous energy resources, with an emphasis on renewable energy supplies. The Council acknowledges the importance of renewable energy in reducing anthropogenic GHG emissions and the contribution of renewable energy in achieving national and EU target net zero GHG emissions by 2050.

Climate change mitigation and adaptation objectives have been incorporated into the policies of the KCCDP. This is to ensure that climate change has been consistently integrated into the policy themes addressed by the KCCDP. The strategic aim for climate change as set out in Chapter 2 of the KCCDP is as follows:

> *"Strategic Aim: To provide a policy framework with objectives and actions in this City and County Development Plan to facilitate the transition to a low carbon and climate resilient County with an emphasis on reduction in energy demand and greenhouse gas emissions, through a combination of effective mitigation and adaptation responses to climate change."*

The KCCDP has aligned its policy and objectives with the Strategic Objectives of the NPF and the RSES to maintain and improve the County's attraction in order to maximise investment opportunities. The KCCDP sets out a number of Strategic Objectives relating to Climate Action including the following:

- ***2B*** *To support the implementation of the National Climate Action Plan and the National Climate Action Charter for Local Authorities, and to facilitate measures which seek to reduce emissions of greenhouse gases by embedding appropriate policies within the Development Plan.*
- ***2C*** *To promote, support and direct effective climate action policies and objectives that seek to improve climate outcomes across the settlement areas and communities of County Kilkenny helping to successfully contribute and deliver on the obligations of the State to transition to low carbon and climate resilient society.*
- ***2E*** *To ensure that the Development Plan transposes, supports and implements strategic objectives of the National Planning Framework and the Southern Regional Spatial and Economic Strategy to create an enabling local development framework that: (a) promotes and integrates important climate considerations in local development and the assessment of planning applications and (b) supports the*

practical implementation of national climate policy and targets to assist in the delivery of the national transition objective.

- ***2G*** *To reduce energy related CO2 emissions of Kilkenny County Council.*
- ***2H*** *To achieve the commitment under the European Climate Alliance to the reduction of greenhouse gas emissions by 10 percent every 5 years.*
- ***11B*** *To identify and designate a Decarbonation Zone (DZ) in the Council's Climate Action Plan for a spatial area in which a range of climate mitigation, adaptation and biodiversity measures are developed to address local low carbon energy, greenhouse gas emissions and climate needs to contribute to national climate action.*

With regard to the Renewable Energy, the KCCDP (as varied) acknowledges that Ireland and Kilkenny have excellent renewable energy resources, which will be a critical and growing component of Irish energy supply to 2020 and beyond. The strategic aim for renewable energy, set out in chapter 11 of the KCCDP (as varied) sets a clear, ambitious target:

> *"Strategic Aim: To generate 100% of electricity demand for the County through renewables by 2030 by promoting and facilitating all forms of renewable energies and energy efficiency improvements in a sustainable manner as a response to climate change in suitable locations having due regard to natural and built heritage, biodiversity and residential amenities."*

The Renewable Energy chapter (Chapter 11) sets out the policy context for all renewables and includes an analysis of each type of renewable energy within the county, covering three aspects as follows:

- An analysis of the resource potential,
- An outline of development management guidelines including potential impacts and
- Objectives and policies for their future development.

In this regard, it is an objective of the KCCDP:

> *"**11A:** To support and facilitate the provision of energy in accordance with Ireland's transition to a low carbon energy future by means of the maintenance and upgrading of electricity and gas network grid infrastructure and by integrating renewable energy sources and ensuring our national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grows over the period of the plan."*

It is estimated that, by 2030, County Kilkenny will use 633 Gigawatt hours (Gwh) of electricity, as stated in the KCCDP (as varied). If County Kilkenny is to reach its strategic aim of generating 100% of their electricity demand, they will need to install 253MW of energy or "*2.09% of the Country's 12.1 GW combined onshore and offshore renewable energy target*" as stated in the KCCDP (as varied). The Proposed Project will contribute towards achieving this important target by supplying 62 MW of energy to the national electricity grid or approximately 27% of the 253MW needed.

Development Management Guidance

Regarding wind energy Development Management Guidance, the KCCDP (as varied) states that "*all planning applications for wind energy developments shall be assessed against the DEHLG's Wind Energy Development Guidelines, 2006, (and any subsequent update of these guidelines) and the County Council's Wind Strategy*".

In the absence of an up to date Wind Energy Strategy for KCC due to the Draft Ministerial Direction on the KCCDP (as varied), it is noted that the design and layout of the Proposed Wind Farm follows the recommendations and guidelines set out in the Wind Energy Development Guidelines published by the then Department of Environment, Heritage and Local Government (DoEHLG) in June 2006 (the

Guidelines (DoEHLG, 2006)), and the *'Best Practice Guidelines for the Irish Wind Energy Industry'* published by the Irish Wind Energy Association in 2012. The design and layout of the Proposed Wind Farm also has regard to the draft Revised Wind Energy Development Guidelines published by the then Department of Housing, Planning and Local Government (DoHPLG) in December 2019 (the Draft Guidelines (DoHPLG, 2019)). Should the Draft Guidelines (DoHPLG, 2019) be adopted in advance of a planning decision being made on the planning application, the Proposed Project will be capable of achieving the requirements of the Draft Guidelines (DoHPLG, 2019) as currently proposed.

Kilkenny Wind Energy Development Strategy 2021

The Wind Energy Development Strategy (WEDS) for KCC forms Appendix K of the KCCDP. The WEDS provides a clear framework for the Council's objectives and methodology for identifying suitable locations for wind energy development in the county. By considering the relevant policy context, this strategy aims to guide and streamline the process of wind energy development in a way that aligns with the overall goals and priorities set by the Council. This approach ensures that sustainable and well-planned wind energy projects can be successfully implemented in the county. The key objectives of the WEDS are set out below:

"The key objectives of this Wind Strategy are as follows:

- *Recognise the importance of wind energy as a renewable energy source and ensure the security of energy supply by supporting, in principle and at appropriate scales and locations, the development of wind energy resources in the county.*
- *Promote the development of wind energy and other renewable energy sources in the county to meet national renewable energy targets (supplying a minimum of 100% of electricity consumption from renewable sources by 2030).*
- *Enable Kilkenny to generate the equivalent of 100% of its electricity needs from renewable energy.*
- *Identify strategic areas in the county for wind energy development.*
- *Provide specific criteria for wind energy development that the planning authority will take into account when considering any wind energy or related proposals.*
- *Investigate the potential for relatively small-scale wind energy developments within urban and industrial areas, and for small community-based proposals outside the strategic areas."*

Chapter 5 of the WEDS characterises the county into 3 different policy areas aimed at facilitating wind farm growth. These policy areas are based on a sieve mapping approach to identify suitable areas for wind energy developments on a number of characteristics. The Strategy areas and descriptions are set out in **Table 2-2** below.

Table 2-2 Kilkenny County Council Wind Energy Strategy Area Designations

Kilkenny County Council – Wind Energy Strategy Areas	
Strategy Areas	Description
Acceptable in Principle -	*This is the preferred area for wind energy development, characterised by high wind speeds, and no significant conflict with environmental designations or sensitivities.*
Open for Consideration -	*This area is characterised by no significant conflict with environmental designations or sensitivities.*

Not Normally Permissible -	*This area is considered to be generally unsuitable for wind farm development. Individual turbines will be considered on a case-by-case basis.*

The Proposed Wind Farm turbines are located in various areas as per **Figure 11 Wind Strategy areas** of the KCCDP (as varied), specifically Turbine 1 (T1) and T2 are located in an 'Acceptable in Principle' (AIP) area, and all other proposed turbines (T3-T10) are located in a 'Not Normally Permissible' area as shown in Figure 11 Wind Strategy areas. However, as outlined above the Draft Ministerial Direction, published on the 15th October 2021, states that:

> *"In accordance with Section 31(4) of the Planning and Development Act 2000, those parts of the Kilkenny City and County Development Plan 2021 – 2027 Plan referred to in the notice shall be taken not to have come into effect, been made or amended; namely;*
>
> *Chapter 11 Renewable Energy: Section 11.4 Kilkenny Targets, Section 11.5.1 Current status and targets and* ***Figure 11.4 Wind Strategy areas." (emphasis added)***

The WEDS also sets out four different categories of wind energy developments depending on their scale as follows:

a) Individual wind turbines

b) Auto producer

c) Small scale wind developments/Community Schemes (Compliant with the REDII Directive definition of community)

d) Large scale wind developments

The WEDS states the following in relation to '*large scale wind energy developments*', which are classified as wind energy projects above 5MW:

> *"Large-scale wind energy developments will,* ***in usual circumstances****, only be considered in 'Acceptable in principle' areas. The rationale behind this policy is to minimise the visual impacts of such large-scale developments, in addition to effects on the environment of County Kilkenny as a whole, as well as to facilitate appropriate grid connections. These will be assessed in accordance with the Wind Energy Development Guidelines." (***emphasis added*)

This policy effectively limits all wind energy developments (bar small installations below 5MW) to the *'Acceptable in Principle'* areas. However, due to the absence of an up to date Wind Energy Strategy with a spatial dimension for Kilkenny, this policy cannot be applied to the Proposed Wind Farm, and so in this scenario there cannot be any contravention of this policy.

Furthermore, it was highlighted by the OPR in their submission to the draft Development Plan, that no national policy basis exists for the restrictive policy relating to large scale wind energy developments and that its inclusion in the KCCDP is unjustified, as set out by the OPR below:

> *"It is also noted that in Table 11.3 'Wind Energy Strategy Areas/ Policy Approach' large scale wind farm development will only be considered in areas designated as 'acceptable in principle', and that wind energy development in areas 'open for consideration' is subject to restrictions under Section 11.5.2. This means that the amendments to change geographical areas designated in the draft Plan as 'acceptable in principle' to 'open for consideration'* ***unreasonably and substantially restrict the opportunity for County Kilkenny to contribute to the national targets for renewable energy set out in the Climate Action Plan 2019.***

> *Furthermore the restrictions in relation to the scale of wind farms under section 11.5.2* ***have no national policy basis for such wind development****. This may have implications for the implementation of your plan, including the decisions of An Bord Pleanála in the context of Section 37(2)(b) of the Act"* (**emphasis added**)

In the absence of an up to date Wind Energy Strategy with a spatial dimension for Kilkenny, it is considered that there is sufficient policy direction at European, national, regional and local level to enable the Proposed Project to be assessed on its merits. Despite the absence of a local spatial Wind Energy Strategy for Kilkenny, the provision of the Proposed Project remains supported by local climate change and renewable energy policy within the KCCDP (as varied), as it recognises the role that indigenous renewable energy has on increasing Kilkenny's energy sustainability and security by reducing dependence on imported fossil fuels.

In similar circumstances in the absence of specific local policy, Planning Authorities have found that there is a comprehensive range of guidance and policy objectives at a national and regional level generally in relation to windfarm developments, and while certain aspects of the KCCDP are not in effect, this does not imply that there is a complete vacuum in policy which precludes the consenting authority from determining the application before it in accordance with the proper planning and sustainable development of the area.[28]

A full breakdown of the compliance of the Proposed Project against relevant Policies and objectives and development management guidance of the KCCDP and the relevant remaining provisions of the KCCDP 2014-2020, is set out in Section 7 of the Planning Report which accompanies the planning application.

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Map Legend

- Red Line Boundary
- Proposed Turbine

Kilkenny Wind Energy Strategy

- Acceptable in Principle
- Not Normally Permissible
- Open to Consideration

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Drawing Title

Wind Energy Strategy for County Kilkenny 2021-2027

Project Title

Killoshulan Wind Farm

Drawn By	Checked By
EC	FR
Project No.	Drawing No.
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2.5.4.2 Kilkenny City and County Development Plan 2014-2020

As detailed in Section 2.5.5 and 2.5.4.1 above, while the KCCDP is the statutory development plan in effect for the County the following parts of the plan referred to within the 2021 Draft Ministerial Direction are taken not to have come in effect namely, Section 11.4 Kilkenny Targets, Section 11.5.1 Current status and targets and Figure 11.4 Wind Strategy Areas contained in Chapter 11 Renewable Energy of the KCCDP.

Accordingly, in accordance with Section 31(6)(b) of the 2000 Act, the corresponding provisions of the previous KCCDP 2014-2020 shall not cease to have effect until such a time that there is a conclusion to the Minister's intervention in the KCCDP and a final Ministerial Direction is issued. At time of writing a final Ministerial Direction has not been issued.

The status of the relevant 'corresponding' provisions of the KCCDP 2014-2020 was examined in the recent Judgement in the case of 'Save the South Leinster Way & Tara Heavey v An Coimisiún Pleanála & Ors ([2025] IEHC 541'. This decision confirmed that it is only the directly corresponding provisions of the KCCDP 2014-2020 which are deemed to have continued effect on a limited 'vestigial basis[29]' (i.e. Figure 10.2, Wind Energy Development Strategy map and the associated explanatory policy text in Section '10.5.4 Wind Energy Policy Areas') and not the Renewable Energy Strategy in the KCCDP 2014-2020 as a whole.

Accordingly, the relevant 'corresponding provision' of the KCCDP 2014-2020 which continues to have effect in this case is the Wind Energy Development Strategy map presented in Figure 10.2, Chapter 10 Renewable Energy Strategy and explanatory policy text under Section '10.5.4 Wind Energy Policy Areas'.

In the KCCDP 2014-2020 the Proposed Wind Farm site is situated on lands identified as 'Unsuitable' (see Figure 10.2 in the KCCDP 2014-2020). The explanatory policy text states that only 'Individual turbines' or 'Auto producers' will be considered on such 'Unsuitable' designed lands. It further states that 'Large-Scale Wind Energy Developments of >5MW, such as the Proposed Project, 'will, in usual circumstances, only be considered in 'Preferred' areas'.

The Planning Report submitted with this application contain a detailed examination and planning assessment against the relevant provisions of the KCCDP 2014-2020.

2.5.4.3 Kilkenny County Council Climate Action Plan 2024 -2029

The Kilkenny County Council Local Authority Climate Action Plan 2024-2029 (Kilkenny LACAP), published in February 2024, sets out KCC's intentions to create a low carbon and climate resilient County. It also aligns itself with international and national policy regarding climate action, highlighting the Climate Act and Ireland's legally binding target of a 51% reduction in GHG emissions by 2030. The vision and scope of the Kilkenny LACAP are defined as follows

> *"Kilkenny County Council will be a climate resilient organisation that inspires and supports the county's transition to a biodiversity rich, sustainable and climate neutral economy by 2050."*
>
> *"1. Achieve its mandated emission reduction (51%) and energy efficiency (50%) targets across its buildings, facilities, fleet, and public lighting.*
>
> *2. Embed a climate action and a sustainability approach across its governance, operations and services.*

[29] *Save the South Leinster Way & Tara Heavey v An Coimisiún Pleanála & Ors ([2025] IEHC 541.*

3. Demonstrate leadership and partnership in climate action, by influencing, coordinating, facilitating and advocating for climate action in other sectors, businesses, communities and individuals.

4. Support a "Decarbonising Zone", as a test bed for climate action."

As outlined above, KCC are committed to climate action and climate mitigation through the implementation of the Kilkenny LACAP. The Kilkenny LACAP builds on the climate objectives set out in the KCCDP (as varied) and KCC's WEDS and is supportive of national policies to reduce GHG emissions and reach carbon neutrality. The Proposed Project is capable of providing the national grid with clean, renewable energy, thus contributing to the decarbonisation of the electricity sector and as such, it is in alignment with the Kilkenny LACAP.

2.5.4.4 Compliance with Local Policy Objectives

The design and layout of the Proposed Project follows the recommendations and guidelines set out in the Guidelines (DoEHLG, 2006) and the Draft Guidelines (DoHPLG, 2019) and the IWEA Guidelines (Irish Wind Energy Association, 2012.)

As set out in detail in **Chapter 3** of the EIAR, a detailed environmental constraints assessment was conducted. The inclusion of the constraints on a map of the study area allowed for a viable area to be identified. An initial turbine layout was then developed to take account of all the constraints and their associated buffer zones and the separation distance required between the turbines. Following the mapping of all known constraints, detailed site investigations were carried out by the project team. Where specific areas were deemed as being unsuitable for the siting of turbines or roads, etc., alternative locations were proposed and assessed, taking into account the areas that were already ruled out of consideration. The turbine layout for the Proposed Wind Farm has also been informed by the results of noise, landscape and visual and shadow flicker assessments.

While the KCCDP is the statutory development plan in effect for the County the following parts of the plan referred to within the 2021 Draft Ministerial Direction are taken not to have come in effect namely, Section 11.4 Kilkenny Targets, Section 11.5.1 Current status and targets and Figure 11.4 Wind Strategy Areas contained in Chapter 11 Renewable Energy of the KCCDP. Accordingly, in accordance with Section 31(6)(b) of the 2000 Act, the corresponding provisions of the previous KCCDP 2014-2020 shall not cease to have effect on a 'vestigial basis' until such a time that there is a conclusion to the Minister's intervention in the KCCDP and a final Ministerial Direction is issued. At time of writing a final Ministerial Direction has not been issued.

The key relevant 'corresponding provision' of the KCCDP 2014-2020 which continues to have effect in this case is the Wind Energy Development Strategy map presented in Figure 10.2, Chapter 10 Renewable Energy Strategy and explanatory policy text under Section '10.5.4 Wind Energy Policy Areas'.

The wind energy zoning context of the Proposed Wind Farm site in the KCCDP 2014-2020 is broadly comparable to the KCCDP. Under the KCCDP 2014-2020 the Proposed Wind Farm site is situated on lands identified as 'Unsuitable' (see Figure 10.2 in the KCCDP 2014-2020). The explanatory policy text states that only 'Individual turbines' or 'Auto producers' will be considered on such 'Unsuitable' designed lands. The KCCDP 2014-2020 states that 'Large-Scale Wind Energy Developments of >5MW, such as the Proposed Project, '*will, in usual circumstances, only be considered in 'Preferred' areas'.*

Similarly, in the KCCDP in the Proposed Wind Farm site is mainly situated on lands identified as 'Not Normally Permissible' with a portion to the south on lands identified as 'Acceptable in Principle' (see Figure 11.4 in the KCCDP). Specifically, T1 and T2 are located in an 'Acceptable in Principle' (AIP) area, and all other proposed turbines (T3-T10) are located in a 'Not Normally Permissible' area as shown in Figure 2-3. Likewise, the KCCDP states that large-scale wind energy developments of >5MW such as the Proposed Project, 'will, in usual circumstances, only be considered in 'Acceptable in

principle' areas'. However, as outlined above, the Draft Ministerial Direction means that the provisions of the Wind Strategy Areas in Figure 11.4 and associated explanatory policy text are taken to not be in effect.

Locally, despite the absence of an up-to-date Wind Energy Strategy for Kilkenny, the KCCDP (as varied) and the Kilkenny LACAP are supportive of renewable energy developments, such as the Proposed Project, as they set out the need for Kilkenny to transition to a low carbon and climate resilient County with a focus on renewable energy to increase the County's energy sustainability and security. Specifically, a strategic aim of the KCCDP (as varied) is to generate 100% of the County's electricity demand through renewable energy by 2030, the Proposed Project with an output of 62MW will support the KCCDP (as varied) in this aim.

2.5.5 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 Planning Act, which has since been repealed. However, the Guidelines (DoEHLG, 2006) are still in force under Section 27(1) of the 2024 Planning Act and are considered National Planning Policy Guidance under Section 27(2) of the 2024 Planning 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 can (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 then 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 DECC, 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 "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 been developed in accordance with the provisions of Draft Guidelines (DoHPLG, 2019) (for example in relation to 4 times the turbine tip height set back distance from third- party sensitive receptors) and the inclusion of a standalone Community Engagement Report with this planning application.

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 may not allow time for the safe shutting down of turbines.

The Government made the commitment in the 'Programme for Government 2025 – Securing Ireland's Future' to prioritise the publication of new Wind Energy Development Guidelines, having regard to international best practice and standards. At time of writing, the Draft Guidelines (DoHPLG, 2019) remain unadopted. The relevant wind energy guidelines for the purposes of Section 27(1) and Section 27(2) of the 2024 Planning Act, 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 shadow flicker and noise standards, please refer to **Chapter 5** and **Chapter 12** for further details. While the final guidelines have not yet been published, it should be noted that shadow flicker is entirely controllable and is discussed further in **Chapter 5**. In addition, the Proposed Project maintains a 4 times maximum tip height set back between turbines and sensitive receptors which is currently the recognised standard for visual amenity purposes, as outlined in the Draft Guidelines (DoHPLG, 2019). Furthermore, community consultation has also been undertaken (refer to **Appendix 2-2**).

IWEA Best Practice Guidelines for the Irish Wind Energy Industry 2012

The Irish Wind Energy Association (IWEA) (now Wind Energy Ireland) published updated Wind Energy Best Practice Guidelines for the Irish Wind Industry in 2012 (hereafter referred to as the IWEA Guidelines). The IWEA Guidelines aim to encourage and define best practice development in the wind energy industry, acting as a reference document and guide to the main issues relating to wind energy developments. The purpose of the IWEA Guidelines is to encourage responsible and sensitive wind energy development, which takes into consideration the concerns of local communities, planners, and

other interested groups. The IWEA Guidelines outline the main aspects of wind energy development with emphasis on responsible and sustainable design and environmental practices, on aspects of development which affect external stakeholders, and on good community engagement practices. In approaching the development of IWEA Guidelines the aim was to be complementary to the Guidelines (DoEHLG, 2006).

IWEA Best Practice Principles in Community Engagement and Community Commitment 2013

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

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

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

Further details on the community engagement that has been undertaken as part of the Proposed Project are presented in **Section 2.8** below. A Community Engagement Report has been prepared by the Applicant 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 PL5/2017

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

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

- The application of a more stringent noise limit, consistent with World Health Organisation (WHO) noise standards, in tandem with a new robust noise monitoring regime, to ensure compliance with noise standards;
- A visual amenity setback of 4 times the turbine height between a wind turbine and the nearest residential property, 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 to connect to the electricity network. 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.

In September 2024, the CRU published its Electricity Connection Policy – Generation and System Services Decision Paper, which sets policy for onshore renewable energy developments connecting to the electricity system. In June 2025, the CRU published its Electricity Connection Policy – Generation & System Service: Pre-engagement and High-level Technical Assessment, which sets out decisions on the pre-application process to facilitate applications. Entry into the ECP-GSS-1 September 2025 batch, to submit a grid application, closed on the 30th of September 2025, for applicants who made a successful pre-application notification.

In November 2025, the CRU published an Information Note (CRU2025182), which sets out an update regarding entrance into the March 2026 batch. Entry into the ECP-GSS-2 March 2026 batch, to submit a grid application, closed on the 31st of March 2026, for applicants who made a successful pre-application notification.

The design of the Proposed Grid Connection has taken account of the Guidelines (DoEHLG, 2006), 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 Grid Connection, once it is permitted, to connect to the electricity network under the enduring connection policy regime.

Renewable Energy Support Scheme

CAP25 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. CAP25 sets out actions across every sector which will ensure we meet our future climate commitments. A key part of the CAP25 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 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 RESS 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, the majority of which are now constructed and operational, represent an increase of nearly 20% in Ireland's current renewable energy generation capacity. RESS 3 concluded in September 2023 and RESS 4 in September 2024. The RESS 5 auction 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 6 auction is currently underway, with results due to be announced in December 2026.

While significant challenges remain in meeting climate targets, the RESS represents a decisive step forward. It lays the foundation for a more sustainable and cost-effective renewable electricity market, supporting the growth of the green economy, promoting sustainable employment opportunities, and boosting Ireland's energy security as renewables become increasingly competitive.

The Proposed Project is in accordance with the CAP25 and a grant of permission for this proposed 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 CAP25 target of 9GW of onshore wind generation by 2030, a target that Ireland is not currently on track to meet, as detailed above in **Section 2.4**.

2.6 Planning History

This section of the EIAR sets out the relevant planning history of the Site, within the Proposed Project planning application boundary (red line boundary) (**Figure 1-2** in **Chapter 1** Introduction) and, for context, also identifies other wind energy development within the wider area (25km from the Proposed Wind Farm turbines).

2.6.1 Planning Applications within the Proposed Project Application Boundary

A planning search was carried out through the national planning application database and ACP's online planning portal in October 2026 for relevant planning applications submitted within the past 10 years that fall within the red line boundary of the Proposed Project which are outlined in Table 2-3 below.

Table 2-3 Planning Applications within the Proposed Project Application Boundary

Pl. Ref.	Description	Planning Authority Decision
1773	for Milk Powder Processing Building including alterations to adjacent existing buildings, partial demolition and extension to the existing Boiler House; demolition of an existing penthouse and its replacement with a similar but higher bag off penthouse; alterations and extension to the Amenity Building, and all associated works	Granted by Kilkenny County Council 05/04/2017
18187	to construct (i) milking parlour with collecting yard and handling/crush yard (ii) slatted tank (iii) over ground slurry tower (iv) cubicle area (v) meal bin and all associated site works	Granted by Kilkenny County Council 29/05/2018
21627	for a ten-year appropriate period planning permission: The installation of 31.49km of a 38kV underground electrical cabling and all other ancillary	Granted by Kilkenny County

Pl. Ref.	Description	Planning Authority Decision
	works including joint bays, culverts, maker posts and all associated development. Advisory Note: The full extent of the grid connection is 33.8km, and a separate planning application will be made for an underground grid connection to Tipperary County Council. The development comprises part of an overall development for which planning permission was granted for a 9 turbine wind farm and all associated works on lands located in the townlands of Farranroy Upper, Farranroy Lower, Coolnashinnagh & Gortnasmuttaun, Co. Tipperary. The planning application will be accompanied by an Environmental Impact Assessment Report (EIAR) and Natura Impact Statement	Council 24/08/2022
21882	for the installation of 2 new cooling tower units and associated concrete bases at the existing Waste Water Treatment Plant and associated ancillary site works. Upgrade works to the existing watermain and all ancillary site works. A Natura Impact Statement has been prepared and accompanies this application	Granted by Kilkenny County Council 10/03/2022
22687	Construction of two anaerobic digesters, one equalization tank to include concrete base, earth embankment and associated works; construction of biogas storage dome with biogas flare, desulfurization unit; construction of membrane and control building with yard slab and link road; construction of ferric chloride storage tank; installation of a new pipeline with underground and overground sections for the purpose of conveying renewable biogas to the Glanbia facility east of the N77 road; realignment of the existing internal road to facilitate vehicle movements; drainage works and all associated site works including landscaping. The dismantling and removal of an existing disused sludge mixing tank; dismantling and removal of an existing biotower. This facility holds an industrial emissions licence issued by the Environmental Protection Agency. A Natura Impact Statement (NIS) will accompany this application	Granted by Kilkenny County Council 27/02//2023
2360147	to construct (i) Slatted tank (ii) Calf shed and all associated site works	Granted by Kilkenny County Council 19/07/2023
2360248	for an amendment to planning application previously granted under reference PL/21/627	Granted by Kilkenny County Council 06/12/2023
2460265	1. New single storey extension to the side of their existing community centre consisting of 2 no. new changings rooms, shower rooms, toilets, physio room, store, entrance lobby and gym, 2. New external signage, 3. New ball wall with all-weather synthetic playing area and associated perimeter fencing, 4. New wastewater treatment system and percolation area, 5. New public lighting to walking track, 6. All associated site developments works	Granted by Kilkenny County Council 11/11/2024
2560003	for a period of 10 years for a development; i. 7 no. wind turbines with an overall turbine tip height of 185 metres; a rotor blade diameter of 163 metres; and hub height of 103.5 metres, and associated foundations and hard-standing areas; ii. A permanent 38kV substation compound (control building with welfare facilities, all associated electrical plant and apparatus, security fencing, underground cabling, storage containers, wastewater holding tank, site drainage and all ancillary works); iii. Permanent underground electrical (38kV) and communications cabling to the existing Ballyragget 110kV substation in the townland of Moatpark (including joint bays, communication and earth sheath link chambers and all ancillary works along the route). This cabling route is	Refused by Kilkenny County Council 27/02/2025 Appealed to An Coimisiún Pleanála 27/03/2025 under ACP Case Ref. PL10.322154

Pl. Ref.	Description	Planning Authority Decision
	primarily located within the public road corridor which includes a Protected Structure (Kilkenny RPS Ref. C886); iv. Underground electrical (33kV) and communications cabling connecting the wind turbines and meteorological mast to the on-site substation; v. 3 no. temporary construction compounds (including site offices and welfare facilities); A meteorological mast with a height of 30 metres, security fencing and associated foundation and hard standing area; vii. A new temporary site entrance on the L1009; viii. A new gated site entrance on the L5024; ix. Upgrade of existing site tracks/ roads and provision of new site access roads, junctions and hardstand areas; x. A borrow pit; xi. Spoil Management; xii. Tree felling and hedgerow removal; xiii. Biodiversity Management and Enhancement Plan measures (including establishment of a riparian buffer and hedgerow enhancement); xiv.Site Drainage; xv. Operational Stage site signage; and xvi. All ancillary works and apparatus. A thirty five-year operational life from the date of full commissioning of the wind turbines and subsequent decommissioning of the wind turbines is being sought. An Environmental Impact Assessment Report and Natura Impact Statement has been prepared in respect of the proposed development and accompany this application	
322154	For a period of 10 years for a development at the site. The development will consist of the provision of 7 no. wind turbines, and all ancillary works and apparatus. An Environmental Impact Assessment Report and Natura Impact Statement has been prepared	Granted by An Coimisiún Pleanála 21/08/2026
2560219	Demolition of an existing diesel bund, a chemical storage bund, and of an existing IBC containment area and for the reconstruction of all, at revised locations. Construction of a two-storey process building. Construction of a 6-bay intake / dispatch canopy and associated single storey services and welfare building. Construction of a refrigeration building with roof mounted mechanical equipment, a transformer enclosure, a chilled water storage tank and a hot water storage tank Construction of a CIP centre complete with associated tanks and vessels and a hot water storage tank adjacent. Construction of a new chemical storage bund and relocation of an existing permeate storage silo. Construction of a silo base and plinth for the housing and installation of 10 number silos. Installation of a modular site cabin and a lightweight metal shed. Construction of a penthouse roof arrangement, installation of roof mounted transformers and roof mounted air handling equipment. Construction of an extension to an existing car park complete with modified access Construction of a new internal access road and for the widening and realignment of the existing internal road network. Construction, incorporating modifications to an existing external stair and retaining wall arrangement. Associated site works including earthworks, berm formation, retaining walls, pipe and service bridges, fencing and screening and drainage works including a new process effluent line with overground and below ground sections, and all associated site works including landscaping.	Granted by Kilkenny County Council 29/07/2025

Pl. Ref.	Description	Planning Authority Decision
	This facility holds an industrial emissions licence issued by the Environmental Protection Agency. An Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS) will accompany this application	
2560418	i. The construction of 6 no. wind turbines with an overall turbine tip height of 175 metres; a rotor blade diameter of 150 metres; and hub height of 100 metres, and associated foundations and hard standing areas; ii. A permanent 38kV substation compound (control building with welfare facilities, all associated electrical plant and apparatus, security fencing including vegetative screening, underground cabling, wastewater holding tank, site drainage and all ancillary works); iii. Permanent underground electrical (38kV) and communications cabling to the existing Ballyragget 110kV substation in the townland of Moatpark (including joint bays, communication and earth sheath link chambers and all ancillary works along the route); iv. Underground electrical and communications cabling connecting the wind turbines and meteorological mast to the on-site substation; v. A meteorological mast with a height of 100m above ground and associated foundation and hard-standing area; vi. Upgrade of existing tracks and roads and the provision of new site access roads; vii. All works associated with the upgrade of the existing agricultural access off the L58333 local road (including the installation of fencing and steel gates); viii. 2 no. temporary construction compounds (including temporary site offices and welfare facilities); ix. Accommodation works along the N77 National secondary road in the townland of Ballynaslee, Co. Kilkenny to facilitate the delivery of turbine components and other abnormal sized loads; x. A borrow pit; xi. Spoil Management; xii. Hedgerow removal; xiii. Biodiversity Management and Enhancement Plan measures (including establishment of new hedgerow, translocation of existing hedgerow and enhancement of existing hedgerow); xiv. Site Drainage; xv. Operational stage site signage; and, xvi. All associated site development works, ancillary works and apparatus. A 10-year planning permission and 35-year operational life from the date of commissioning of the entire wind farm is being sought. An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) accompany this planning application."	Refused by Kilkenny County Council 02/09/2025 Appealed to An Coimisiún Pleanála 27/10/2025 under ACP Case Ref. PL10.323759
323759	The construction of 6 no. wind turbines and all associated works. An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) accompanies this application.	Ongoing case with An Coimisiún Pleanála
308824	N77 Ballyragget Village to Ballynaslee Road Improvement Scheme	Granted by An Coimisiún Pleanála 26/08/2021
316132	Two anaerobic digesters with storage dome with associated and ancillary site development works. A Natura Impact Statement (NIS) will accompany this application	Granted by An Coimisiún Pleanála 25/02/2025
324680	10 year planning permission for Gathabawn Wind Farm consisting of 12 no. wind turbines and ancillary works	To be decided by An Coimisiún

Pl. Ref.	Description	Planning Authority Decision
		Pleanála 27/09/2027

2.6.2 Wind Energy Developments within 25km of the Proposed Wind Farm Turbines

A planning search was carried out to establish proposed, permitted and operational wind energy developments within 25km of the Proposed Wind Farm turbines. This distance was chosen as it is considered that cumulative impacts would not exist with any development proposed, permitted or operational, greater than 25km from the Proposed Wind Farm turbines, please refer to **Section 2.9.3** for further details.

The search was carried out using the relevant local authority and ACP databases in October 2026 for relevant planning applications. In total, 24 no. wind energy developments were identified within 25km of the Proposed Wind Farm turbines, 22 no. of which relate to proposed, permitted or existing multiple turbine wind farm developments and a further 2 no. of which relate to proposed, permitted or existing single turbine developments. These are outlined in greater detail in Table 2-4 below.

Table 2-4 Wind Energy Developments within 25km of the Proposed Wind Farm turbines

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
Single/ Domestic Turbine Developments								
Tipperary County Council (TCC) Pl. Ref. 09/801	Gurteen Lower Single Wind Turbine	Tipperary	Gurteen Wind Farm Ltd.	1 no. wind turbine, site tracks, hard standing areas, anemometry mast, small control building and compound, underground cabling, temporary site works and ancillary works.	Granted by TCC on 16/12/2010	Existing	1	14km
KCC Pl. Ref. 26/60292	Loan Single Wind Turbine	Kilkenny	Art Generation Limited	For construction of a Single Wind Turbine development on a 5.98-hectare site consisting of: - I. A single 4.26-megawatt (MW) wind turbine with an overall tip height of 150 metres, comprising a rotor diameter of 138m and a hub height 81m; II. Wind turbine foundation, crane hardstanding and assembly area; III. Temporary Construction Compound; IV. Upgrading and repositioning of existing farm entrance; V. Upgrading and widening of existing access track; VI. New access track; VII. An on-site 20kV electrical substation building; VIII. Electrical and communication cabling within private lands; IX. Underground 20kV grid connection within private lands and within the L5851 and the R426 public roads connecting to the existing ESB Castlecomer 38kV Substation; X. Hedge and tree removal, landscaping and reinstatement works; and XI. All associated ancillary works. The operational	Application submitted to KCC on 15/05/2026 – Decision pending	Proposed	1	21km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				lifespan of the development will be 35-years from the date of commissioning. This Planning Application is accompanied by a Natura Impact Statement (NIS). This Planning Application is not subject to an Environmental Impact Assessment Report (EIAR). This development is covered by the provisions of the Renewable Energy Directive III (Directive (EU) 2023/2413) and it is important to note that the planning application may be subject to section 34D of the Planning and Development Act 2000, as amended. When a notice issues in accordance with section 34D(b), the provisions of article 26A of the Planning and Development Regulations 2001 to 2025 shall apply.				
Large Wind Energy Developments								
TCC Pl. Ref. 09/781 ACP Case Ref. PL23.237713	An Cnoc Wind Farm	Tipperary	Cnoc Windfarms Ltd.	5 no. wind turbines, site tracks, hard standing areas, anemometry mast, small control building and compound, underground cabling, site signage, temporary site works and ancillary works; an Environmental Impact Statement has been submitted with application.	Granted by TCC on 10/09/2010 Appealed and granted by ACP on 22/03/2011	Existing	5	11km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
TCC Pl. Ref. 13/231 ACP Case Ref. 23.243357	Ballincurry Wind Farm	Tipperary	Biogas Environmental Tipperary East Ltd.	A single wind turbine, overall height of up to 126.5 metres, electrical control building, access road, attenuation pond and ancillary site works.	Refused by TCC on 10/04/2014 Appealed and granted by ACP on 01/10/2014	Existing	2	19km
TCC Pl. Ref. 15/600561 ACP Case Ref. 92.245874			Ballincurry Wind Farm Limited	A single wind turbine, overall height of up to 138 metres, electrical control building, access road and ancillary site works.	Refused by TCC on 17/11/2015 Appealed and granted by ACP on 26/08/2016			
KCC Pl. Ref. 12/533	Ballybay Wind Farm	Kilkenny	ART Generation Ltd.	For windfarm, in the townslands of Boggan and Ballybeagh, Tullaroan, Co. Kilkenny, comprising of six turbines with a hub height of 74.5m and a maximum blade tip height of 110m, together with a borrow pit, 80m permanent metrological mast and associated access roads and site works. This will replace a	Granted by KCC on 20/02/2013	Existing	6	8km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				previous permission for a windfarm granted under Planning ref no. 02/1072 which was extended under 08/735 and subsequently under 12/194 for five turbines, four turbines with a hub height of 60m and maximum blade tip height of 93m and one turbine with a hub height 49m and maximum blade tip height of 82m, on a site at Ballybeagh, Tullaroan, Co. Kilkenny. An appropriate period of 10 years (duration of the planning permission to construct the development) is sought, with an operational life of 25 years after the date of commissioning. An Environmental Impact Statement (EIS) and Natura Impact Statement (NIS) accompany this application. Development.				
KCC Pl. Ref. 14/515			Ballybay Wind Farm Limited	For development. The development consists of:- Modification of planning permission Reg.ref 12/533 for a six turbine wind farm, located in the townlands of Boggan and Ballybeagh, Tullaroan, Co. Kilkenny. Planning permission was granted for six turbines each with a hub height of 74.5m, blade length of 35.5m and a maximum blade tip height of 110m and all associated infrastructure under Reg. ref 12/533. The proposed modification will consist of (i) reducing each turbine hub height from 74.5m to 69m; and (ii) increase each turbine blade length from 35.5m to 41m keeping within	Granted by KCC on 20/02/2015			

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				the overall permitted maximum tip height of 110m as granted under Reg.ref 12/533. The location of the turbines and all other elements of the wind farm layout will remain unaltered as granted planning permission under Reg.ref 12/533.				
KCC Pl. Ref. 10/145	Bruckana Wind Farm	Kilkenny	Bord na Mona Energy Limited	For development. The development will consist of eight wind turbines of up to 100m hub height and up to 112m rotor diameter with a total height not exceeding 156m; a transformer and crane hardstand area at each turbine; under-ground electrical and communication cables linking the turbines; internal site tracks, the upgrading of existing access tracks; drainage works; a 38kV substation with associated equipment and control building with associated septic tank and treatment system; a section of the proposed 38kV overhead power line from the proposed 38kV substation in Bruckana to the 110kV Lisheen substation; a permanent meteorological lattice mast 100m high; and associated works. This development is part of a larger development which also extends to parts of County Laois (townland of Baunaghra) and North Tipperary (townlands of Killoran and Tullowmacjames). The development as a whole will consist of a wind farm comprising: 16 wind turbines of up to 100m hub height	Granted by KCC on 24/11/2010	Existing	14	11km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				and up to 112m rotor diameter with a total height not exceeding 156m; a transformer and crane hardstanding area at each turbine; underground electrical and communication cables linking the turbines; internal site tracks; a permanent meteorological lattice mast 100m high; drainage works; a 38kV substation and associated equipment and control building with associated septic tank and treatment system; a 38kV overhead line to the 110kV Lisheen substation; and associated works. An Environmental Impact Assessment accompanies the application. The development is proposed on a site that is the subject of an Integrated Pollution Control Licence (Reg. No. 499) as issued by the EPA in accordance with the provisions of the Environmental Protection Agency Act, 1992.				
Laois County Council (LCC) Pl. Ref. 10/129		Laois	Bord na Mona Energy Ltd.	Erect 4 wind turbines of up to 100m hub height and up to 112m rotor diameter with a total height not exceeding 156m; a transformer and crane hardstand area at each turbine; underground electrical and communications cables linking the turbines; internal site tracks; drainage works and associated works. This development is part of a larger development which also extends to parts of Co. Kilkenny and North Tipperary. The development as a whole will consist of a wind farm	Granted by LCC on 26/01/2011			

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				comprising; sixteen wind turbines of up to 100m hub height and up to 112m rotor diameter with a total height not exceeding 156m; a transformer and crane hardstanding area at each turbine; underground electrical and communication cables linking the turbines; internal site tracks; a permanent meteorological lattice mast 100m high; drainage works; a 38kV substation and associated equipment and control building with associated septic tank and treatment system; a 38kV overhead line to the 110kV Lisheen substation and associated works. An Environmental Impact Assessment accompanies the application. The development is proposed on a site that is the subject of an integrated Pollution Control Licence (Reg. No. 499) as issued by the EPA in accordance with the provisions of the Environmental Protection Agency act, 1992.				
TCC Pl. Ref. 10/510118		Tipperary	Bord na Mona Energy Ltd.	Four wind turbines of up to 100m hub height and up to 112m rotor diameter with a total height not exceeding 156m; a transformer and crane hardstand area at each turbine; underground electrical and communication cables linking the turbines; internal site tracks; drainage works; a section of the proposed 38kV overhead power line from the proposed 38kV substation in Bruckana to	Granted by TCC on 11/02/2011			

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				the 110kV Lisheen substation; and associated works. This development is part of a larger development which extends to parts of County Laois (townland of Baunaghra) and County Kilkenny (townlands of Bruckana, Rathpatrick and Baunmore). The development as a whole will consist of a wind farm comprising: sixteen wind turbines of up to 100m hub height and up to 112m rotor diameter with a total height not exceeding 156m; a transformer and crane hardstanding area at each turbine; underground electrical and communication cables linking the turbines; internal site tracks; a permanent meteorological lattice mast 100m high; drainage works; a 38 kV substation and associated equipment and control building with associated septic tank and treatment system; a 38 kV overhead line to the 110 kV Lisheen substation; and associated works. An Environmental Impact Assessment accompanies the application. The development is proposed on a site that is the subject of an integrated Pollution Control Licence (Reg. No. 499) as issued by the EPA in accordance with the provisions of the Environmental Protection Agency Act, 1992.				

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
KCC Pl. Ref. 08/1511	Lisdowney Wind Farm	Kilkenny	Matt Bergin & Thomas McEvoy	For development which will consist of 4 wind turbines with service roadways, electrical control and transformer compound and anemometer. The application is accompanied by an Environmental Impact Statement.	Granted by KCC on 28/01/2010	Existing	4	5km
KCC Pl. Ref. 12/172			Lisdowney Wind Farm Ltd	For a modification for the redesign of a previously approved development at site address Lisdowney, Ballyragget, Co. Kilkenny planning reference no 08/1511. The previously approved development consisted of a wind farm with 4 turbines, a meteorological mast, electrical control transformer building, burrow pit and associated site roads. The proposed revision is to optimise the layout of the 4 turbines and associated road infrastructure and associated ancillary works and increase the hub height from 64m up to a hub height of 80m and increase the maximum blade tip height from 99.5m to 121.5m. Permission is being sought for a 10 year period. An environmental impact statement (EIS) and natura impact statement (NIS) accompany this application.	Granted by KCC on 23/07/2012			
TCC Pl. Ref. 06/510773	Lisheen Wind Farm I	Tipperary	Anglo American Lisheen Mining Ltd.	Wind turbine farm consisting of 22 No. wind turbine generators, access roads, craneage pads and associated infrastructure. An Environmental Impact Statement will	Granted by TCC on 31/01/2007	Existing	18	11km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
ACP Case Ref. PL22.222142				be submitted to the Planning Authority with this Application.	Appealed and Granted by ACP on 14/08/2007			
TCC Pl. Ref. 09/510100	Lisheen Wind Farm II	Tipperary	SWS Energy Ltd.	12 no wind turbines (hub height 95m, blade diameter 90m), with an overall height from ground to blade tip of 140m, the use of 3 no. new borrow pits, construction of internal site tracks, upgrade of existing access track and associated works as an extension to Lisheen Wind Farm (Pl Ref no 06/51/0773, ABP Ref PL22.222142). An EIS has been submitted with this application.	Granted by TCC on 30/09/2009	Existing	12	11km
KCC Pl. Ref. 14/202	Lisheen Wind Farm III	Kilkenny	SWS Energy Limited	For development. The development will consist of 6 no. wind turbines, to a maximum tip height of 156m; Associated hardstandings at each turbine location; Underground electrical and communication cables, linking the turbines to the substation and control building at the existing 110kV Lisheen Sub-Station, Co. Tipperary; Upgrade of approximately 380m of existing access tracks; Construction of approximately 4.5km of new internal site access tracks; Construction of new drainage system and watercourse crossings; 2 no. borrow pits; associated felling of forestry and replanting; and Related site works and ancillary	Granted by KCC on 09/03/2015	Existing	8	10km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				development. A ten-year permission is sought. The application is accompanied by an Environmental Impact Statement and Natura Impact Statement. The development is part of a larger development and the site also extends into the townlands of Graigueadrisly, Co.Laois and Killoran near Templetuohy, Co. Tipperary. SWS Energy Limited also intends to apply to Laois County Council for planning permission for development at Graigueadrisly, Co. Laois. The development will consist of two wind turbines to a maximum tip height of 156m; Associated hardstandings at each turbine location; Underground electrical and communication cables, linking the turbines to the substation and control building at the existing 110kV Lisheen Sub-Station, Co.Tipperary; Construction of approximately 1.2km of new internal site access tracks; Construction of new drainage system and watercourse crossings; associated felling of forestry and replanting; and Related site works and ancillary development. A ten-year permission is sought. The application is accompanied by an Environmental Impact Statement and Natura Impact statement. SWS Energy Limited also intends to apply to North Tipperary County Council for planning permission for development at				

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				Killoran near Templetuohy, Co. Tipperary. The development will consist of underground electrical and communication cables, linking the turbines to the substation and control building at the existing 110kV Lisheen Sub-Station, Co. Tipperary; and Construction of approximately 1.3km of new internal site access tracks. A ten-year permission is sought. The application is accompanied by an Environmental Impact Statement and Natura Impact Statement.				
KCC Pl. Ref. 19/787			Lisheen III Wind Farm Limited	The development will consist of alterations to a previously permitted wind farm development (Planning Register References 14/202 & 15/629 (Kilkenny), 14/109 (Laois) and 14/510138 & 15/600924 (Tipperary)) where the permitted development also extends into the townland of Graigueadrisly, County Laois and Killoran near Templetuohy, County Tipperary. The proposed alterations will consist of: increasing the turbine rotor diameter of the six permitted turbines from a maximum of 113m to a maximum of 136m, while maintaining the overall tip height of up to 156m per the permitted development. A ten-year permission is sought. The application is accompanied by a Natura Impact Statemet, Planning Report and Environmental Considerations Report. Lisheen III Wind Farm Limited	Granted by KCC on 24/01/2020			

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				also intends to apply to Laois County Council for planning permission for development at Graigueadrisly, County Laois. The proposed alterations will consist of increasing the turbine rotor diameter of two permitted turbines from a maximum of 113m to a maximum of 136m, while maintaining the overall tip height of up to 156m per the permitted development.				
KCC Pl. Ref. 20/459			Lisheen III Wind Farm Limited	The development will consist of alterations to a previously permitted wind farm development (Planning Register References 14/202, 15/629 & 19/787 (Kilkenny), 14/139 & 19/597 (Laois) and 14/510138 & 15/600924 (Tipperary) where the permitted development also extends into the townlands of Graigueadrisly, County Laois and Killoran near Templetuohy, County Tipperary. The proposed alteratons will consist of: increasing the tip height of the six permitted turbines from a maximum of 156m to a maximum of 169m and extending the operational lifetime of the wind farm, from the date of commissioning, from 25 years to 30 years. A ten-year permission is sought. The application is accompanied by a Natura Impact Statement, Planning Report and Environmental Considerations Report. Lisheen III Wind Farm Limited also intends to apply to Laois County Council for planning permission	Granted by KCC on 12/01/2021			

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				for development at Graigueadrisly, County Laois. The proposed alterations will consist of: increasing the tip height of two permitted turbines from a maximum of 156m to a maximum of 169m and extending the operational lifetime of the wind farm, from the date of commissioning, from 25 years to 30 years.				
LCC Pl. Ref. 14/139		Laois	SWS Energy Limited	The development will consist of two wind turbines to a maximum tip height of 156m; Associated hardstandings at each turbine location; Underground electrical and communication cables, linking the turbines to the substation and control building at the existing 110kV Lisheen Sub-station; Co. Tipperary Construction of approximately 1.2km of new internal site access tracks; Construction of new drainage system and watercourse crossings; associated felling of forestry and replanting; and Related site works and ancillary development . A ten-year permission is sought. The application is accompanied by an Environmental Impact Statement and Natura Impact Statement.	Granted by LCC on 09/04/2015			
LCC Pl. Ref. 19/597			Lisheen III Wind Farm Limited	Alter previously permitted wind farm development (Planning Register References 14/139 (Laois), 14/202 & 15/629 (Kilkenny) and 14/510138 & 15/600924 (Tipperary)) where the permitted development also extends into the townlands of Bruckana, Baunmore and	Granted by LCC on 01/04/2020			

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				Rathpatrick, County Kilkenny and Killoran near Templetuohy, County Tipperary. The proposed alterations will consist of: increasing the turbine rotor diameter of the two permitted turbines from a maximum of 113m to a maximum of 136m, while maintaining the overall tip height of up to 156m per the permitted development. A ten-year permission is sought. The application is accompanied by a Natura Impact Statement, Planning Report and Environmental Considerations Report. Lisheen III Wind Farm Limited also intends to apply to Kilkenny County Council for planning permission for development at Bruckana, Baunmore, Rathpatrick, County Kilkenny. The propped alterations will consist of: increasing the turbine rotor diameter of six permitted turbines from a maximum of 113m to a maximum of 136m, while maintaining the overall tip height of up to 156m per the permitted development.				
LCC Pl. Ref. 20/386			Lisheen III Wind Farm Limited	The development will consist of alterations to a previously permitted wind farm development (Planning Register References 14/139 & 19/597 (Laois), 14/202, 15/629 & 19/787 (Kilkenny) and 14/510138 & 15/600924 (Tipperary)) where the permitted development also extends into the townlands of Bruckana , Baunmore	Granted by LCC on 01/03/2021			

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				and Rathpatrick, County Kilkenny and Killoran near Templetuohy, County Tipperary. The proposed alterations will consist of: increasing the tip height of the two permitted turbines from a maximum of 156m to a maximum of 169m and extending the operational lifetime of the wind farm, from the date of commissioning, from 25 years to 30 years. A ten-year permission is sought. The application is accompanied by a Natura Impact Statement, Planning Report and Environmental Considerations Report. Lisheen III Wind Farm Limited also intends to apply to Kilkenny County Council for planning permission for development at Bruckana, Baunmore and Rathpatrick, County Kilkenny. The proposed alterations will consist of : increasing the tip height of six permitted turbines from a maximum of 156m to a maximum of 169m and extending the operational lifetime of the wind farm, from the date of commissioning, from 25 years to 30 years. The planning application includes a Natura Impact Statement.				
TCC Pl. Ref. 03/510957	Monaincha Wind Farm	Tipperary	J.J. Harrington	Construct a windfarm to consist of (a) 10 wind turbine generators of hub height 80m; (b) a 50m anemometer mast; (c) electrical substation and switch station; (d) proprietary treatment unit and raised irrigation area; (e)	Granted by TCC on 06/04/2004	Existing	10	24km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				access tracks and buried cable ducts; (f) associated site works. E.I.S. submitted with application.				
TCC Pl. Ref. 09/510084			Monaincha Windfarm Ltd.	Windfarm development which has been the subject of a successful previous planning application reference 03510957. This application seeks a ten year permission for the previously permitted development and will consist of: (a) 10 no. wind turbine generators of hub height 80m; (b) Electrical substation & switch station; (c) Proprietary treatment unit & waste water holding tank; (d) Access tracks & buried cable ducts; (e) All associated site works & miscellaneous landscaping & enabling works. It should be noted that an Environmental Impact Statement is submitted with this application.	Extension of duration granted by TCC on 17/12/2009			
TCC Pl. Ref. 11/510203			Monaincha Wind Farm Ltd.	For a modification to Planning Ref. 09/51/0084 (Monaincha Wind Farm) and an amendment to associated Planning Conditions. The primary modification is an increase in turbine tip height from 125m to 156m. As a result of this modification there will also be minor (micrositing) changes in the location of 5 no. turbines and associated revisions to the supporting civil infrastructure design, including the provision of a borrow pit. An environmental impact statement accompanies this application.	Granted by TCC on 08/09/2011			

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
TCC Pl. Ref. 12/510174	Monaincha Wind Farm Extension	Tipperary	Monaincha Wind Farm Ltd.	For an extension to Monaincha Wind Farm (Planning Ref 11/51/0203). The extension will comprise of 5 No. turbines with a tip height of up to 156m and associated access tracks and site works. An Environmental Impact Statement and Natura Impact Statement accompany this application.	Granted by TCC on 09/08/2012	Existing	5	24km
KCC Pl. Ref. 12/378	Foyle Wind Farm	Kilkenny	Art Generation Ltd.	For a windfarm comprising of four turbines with a hub height of 80m and a maximum blade tip height of 121m, together with an electrical transformer plant, control housing, borrow pit, metrological mast and associated access roads and site works. This will replace a previous permission for a windfarm granted under Planning ref no 05/1256 which was extended under 11/461 for five turbines with a hub height of 49m and a maximum blade tip height of 76m on a smaller site, Permission is being sought for a 10 year period. An Environmental Impact Statement (EIS) and Natura Impact Statement (NIS) accompany this application.	Granted by KCC on 14/11/2012	Existing	4	10km
KCC Pl. Ref. 13/9			Art Generation Ltd.	To amend the terms of use of a permitted development, the operational period of which is restricted to 10 years under condition 5 b of permission reference P12/378. The permitted development (12/378) comprises four wind turbines with hub height of 80m and a maximum blade tip height of 121m, together	Granted by KCC on 04/04/2013			

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				with an electrical transformer station, control housing, borrow pit, meteorological mast and associated access roads and site works at this site. The proposed development will comprise a material amendment to the terms of the use by extending the operational period of the turbines from the permitted 10 years to 25 years. An Environmental Impact Statement (EIS) and a Natura Impact Statement (NIS) will be submitted to the Planning Authority with the application.				
KCC Pl. Ref. 16/17	Foyle Wind Farm Extension	Kilkenny	Art Generation Ltd.	In the townslands of Killeen, Foylatalure and Courtstown, Tullaroan, Co. Kilkenny, for one wind turbine with a hub height up to 80m and a maximum blade tip height up to 121m, underground cabling, together with associated access road (337m) and site works. The proposed turbine will form part of a permitted wind farm (PL. Ref. 12/378 as amended by PL13/9) on the adjacent Foylatalure and Courtstown site and will utilise/share the constructed access roads, borrow pit and permitted control building. The development also proposes a 20kV electrical connection between the permitted adjacent Foylatalure Wind Farm (PL.Ref. 12/378 as amended by PL 13/9) and permitted 38kV Sub-station at Ballybeagh Co. Kilkenny (PL.Ref.12/485). The 20kV electrical	Granted by KCC on 11/04/2016	Permitted	3	10km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				connection (c.5.275km long) will consist of: c.2.293km of overhead 20kV line mounted on single pole sets and c.2.982km of underground ducted 20kV cable in the townlands of Courtstown, Rathmacan, Kyleballyoughter, Gortnagap and Ballybeagh. An appropriate period of 10 years (i.e. duration of the planning permission to construct the development) is sought, with an operational life of 25 years after the date of commissioning. An Environmental Impact Statement and Natura Impact Statement accompany this application.				
KCC Pl. Ref. 23/81			Art Generation Ltd.	Of Planning Permission Reference P.16/17	Extension of duration granted by KCC on 12/07/2023			
KCC Pl. Ref. 16666			Art Generation Ltd.	For 2 No. wind turbines with a hub height up to 80m and a maximum blade tip height up to 121m, A grid control building, underground cabling, borrow pit, together with associated access roads and site works. The proposed turbines will form part of a permitted wind farm (PL. Ref.12/378 as amended by PL 13/9) on the adjacent Foylatalure and Courtstown site. An appropriate period of 10 years (i.e. duration of the	Granted by KCC on 27/03/2017			

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				planning permission to construct the development) is sought with an operational life of 25 years after the date of commissioning. An Environmental Impact Statement has been submitted with this application.				
KCC Pl. Ref. 24/33			Art Generation Ltd.	of Planning Permission Ref P16666	Extension of duration granted by KCC on 13/05/2024			
ACP Case Ref. PA10.322069	Ballynalacken Wind Farm	Kilkenny	Rowanmere Limited	Proposed Development of the Ballynalacken Windfarm Project.	Granted by ACP on 15/04/2026	Permitted	12	15km
ACP Case Ref. PA92.318704	Borrisbeg Wind Farm	Tipperary	Buirios Limited	10 year development of 9 Wind Turbines and associated infrastructure.	Granted by ACP on 12/09/2024	Permitted	9	21km
KCC Pl. Ref. 25/60003 ACP Case Ref. PL10.322154	Briskalagh Wind Farm	Kilkenny	Briskalagh Ltd.	For a period of 10 years for a development at this site situated in the townlands of Acragar, Ballyconra, Ballycuddihy, Ballyroe, Ballyroe (Grace), Ballyroe (Maher), Baunaniska, Boherkyle, Briskalagh, Brittas, Clone, Coolnapisha, Curraghduff, Freshford, Freshford Lots, Graigueswood, Grange, Huntstown, Kilmanagh, Knockeenglass, Knockown, Moatpark, Monabrika, Monavadaroe, Moneenaun, Oldtown, Oldtownhill, Parksgrove, Picketstown, Rathealy, Sart, Sweethill,	Refused by KCC on 27/02/2025 Appealed and Granted by ACP on 21/08/2026	Permitted	7	11km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				Tobernapeastia, Tullaroan, Upperwood Demesne, Co. Kilkenny. The development will consist of the provision of the following: i. 7 no. wind turbines with an overall turbine tip height of 185 metres; a rotor blade diameter of 163 metres; and hub height of 103.5 metres, and associated foundations and hard-standing areas; ii. A permanent 38kV substation compound (control building with welfare facilities, all associated electrical plant and apparatus, security fencing, underground cabling, storage containers, wastewater holding tank, site drainage and all ancillary works); iii. Permanent underground electrical (38kV) and communications cabling to the existing Ballyragget 110kV substation in the townland of Moatpark (including joint bays, communication and earth sheath link chambers and all ancillary works along the route). This cabling route is primarily located within the public road corridor which includes a Protected Structure (Kilkenny RPS Ref. C886); iv. Underground electrical (33kV) and communications cabling connecting the wind turbines and meteorological mast to the on-site substation; v. 3 no. temporary construction compounds (including site offices and welfare facilities); A meteorological mast with a height of 30 metres, security				

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				fencing and associated foundation and hard standng area; vii. A new temporary site entrance on the L1009; viii. A new gated site entrance on the L5024; ix. Upgrade of existing site tracks/ roads and provision of new site access roads, junctions and hardstand areas; x. A borrow pit; xi. Spoil Management; xii. Tree felling and hedgerow removal; xiii. Biodiversity Management and Enhancement Plan measures (including establishment of a riparian buffer and hedgerow enhancement); xiv. Site Drainage; xv. Operational Stage site signage; and xvi. All ancillary works and apparatus. A thirty five-year operational life from the date of full commissioning of the wind turbines and subsequent decommissioning of the wind turbines is being sought. An Environmental Impact Assessment Report and Natura Impact Statement has been prepared in respect of the proposed development and accompany this application.				
ACP Case Ref. PA92.321454	Brittas Wind Farm	Tipperary	Brittas Windfarm Limited	Proposed development of 10 Wind Turbines, 110kV Electrical Substation and ancillary development.	Granted by ACP on 02/04/2026	Permitted	10	20km
TCC Pl. Ref. 20/972	Farranrory Wind Farm	Tipperary	Gromane Limited	A ten year planning permission for a renewable energy development with a 40-year operational life (from the date of commissioning of the renewable energy	Granted by TCC on 30/03/2021	Permitted	9	13km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				development). The entirety of the development constitutes the provision of a 9-turbine wind farm and all associated works on lands in both Counties Tipperary and Kilkenny. This development comprises part of an overall development for which planning permission is also sought for a 38kV substation in the townland of Killeen, Co. Kilkenny. A separate planning application will be made for an underground grid connection to Tipperary County Council and to Kilkenny County Council. The proposed development will constitute the provision of the following: • Construction of up to 9 turbines each with a maximum overall ground to blade tip height of up to 150 metres and associated foundations and hardstand areas; • Construction of new site entrances and upgrade of existing site entrances; • Internal wind farm underground power and communications cabling; • Upgrade of existing access tracks and provision of new site access roads; • Removal of existing Meteorological Masts and construction of 1 new Meteorological Mast for monitoring wind speeds with a maximum height of up to 85 metres; • Site drainage network • Construction of a new temporary site compound for use during construction; • Two Borrow Pits •				

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				Construction of a new on-site 38kV substation The planning application will be accompanied by an Environmental Impact Assessment Report (EIAR) and Natura Impact Statement.				
TCC Pl. Ref. 23/60803			Gromane Limited	An amendment to the planning application previously granted permission under planning reference 20/972. The previously consented planning application included the construction of 9 turbines with maximum overall ground to blade tip height of up to 150 metres, associated foundations and hardstand areas; new site entrances, upgrade of existing site entrances; new on-site 38KV substation and all ancillary site works. The proposed amendments to the previously consented application comprise: (1) Increase the tip height of the turbines from 150 to 156.5 metres and increase the rotor diameter from 133 to 136 metres (3) Reconfiguration of a number of the consented hardstand layouts and associated changes to internal access roads (4) Minor Adjustments to the red line boundary (5) Provision of LiDAR (This application is accompanied by a NIS).	Granted by TCC on 10/01/2024			
LCC Pl. Ref. 16/260	Pinewoods Wind Farm	Laois	Pinewood Wind Limited	Construct 11 no. wind turbines, each with a maximum height of up to 136.5 metres, and all associated site development and ancillary works, including a 110kV	Refused by LCC on 19/04/2017	Permitted	11	20km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
ACP Case Ref. PL11.248518				electricity substation, switchroom and equipment compound; two single circuit strain towers with a maximum height of up to 26.5 metres; turbine foundations; crane hardstandings; 5.4 kilometres of site access tracks; underground electricity and communications cabling; site drainage works; 7 no. site entrances; a permanent meteorological mast with a maximum height of up to 85 metres; and temporary upgrade to the R430/L7800 road junction. The proposed development is part of a larger development which also extends onto lands in the townland of Crutt, Co. Kilkenny within the adjoining planning authority administrative jurisdiction of Kilkenny County Council. The proposed development as a whole will comprise 10 no. wind turbines, each with a maximum height of up to 136.5 metres, and all associated site development and ancillary works, including a 110kV electricity substation, switchroom and equipment compound; two single circuit strain towers with a maximum height of up to 26.5 metres; turbine foundations; crane hardstandings; 7.4 kilometres of site access tracks, underground electricity and communications cabling; site drainage works; 7 no. site entrances; a permanent meteorological mast with a maximum height of up to	Appealed and Granted by ACP on 03/09/2019			

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				85 metres; and temporary upgrade to the R430/L7800 road junction. This planning application is accompanied by an Environmental Impact Statement which includes an assessment of the likely impacts of the proposed development as a whole and in combination with the relevant off-site or secondary developments which will occur as a direct result of the proposed development, including connection to the national electricity grid. A Natura Impact Statement will also be submitted to the planning authority with the planning application.				
LCC Pl. Ref. 22/507 ACP Case Ref. PL11.316305			Pinewood Wind Limited	Amend the wind farm development permitted under An Bord Pleanála Reference PL11.248518 (Laois County Council Planning Register Reference 16/260) to provide: (i) an increase in the rotor diameter of the wind turbines from 103 metres to 117 metres; (ii) a reduction in the hub height of the wind turbines from 85 metres to 78 metres, thus retaining the permitted overall tip height of the wind turbines of 136.5 metres; (iii) the re-siting of wind turbines T8, T9, and T10 and their associated foundations and crane hardstandings by 3 metres, 5.5 metres and 10 metres respectively; and (iv) all associated site development, drainage, access and reinstatement works. This planning application is	Granted by LCC on 22/03/2023 Appealed and Granted by ACP on 16/09/2024			

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				accompanied by an Environmental Impact Assessment Report/Environmental Impact Statement which includes an assessment of the likely effects of the proposed development, as a whole and In combination with the relevant off-site or secondary developments which will occur as a direct result of the proposed development, including the infrastructure associated with the wind farm development permitted pursuant to Laois County Council Planning Register Reference 16/260 (An Bord Pleanála Reference PL11.248518) and Kilkenny County Council Planning Register Reference 17/62 (An Bord Pleanála Reference PL10.248392) and the electricity substation permitted pursuant to An Bord Pleanála Reference ABP-308448-20. This planning application is also accompanied by Natura Impact Statement.				
ACP Case Ref. PA01.315365	White Hill Wind Farm	Kilkenny and Carlow	White Hill Wind Limited	Wind energy development consisting of 7 no. wind turbines and all associated works.	Granted by ACP on 21/11/2023	Permitted – Currently under Judicial Review	7	Approx. 25km
ACP Case Ref. PM01.319903			White Hill Wind Limited	Proposed amendments to the previously authorised White Hill Wind Farm (ABP-315365-22) to alter the location of 2 number wind turbines.	Granted by ACP on 10/09/2024			

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
Old ACP Case Ref. PA11.317809 New ACP Case Ref. PA11.324343	Coolglass Wind Farm	Laois	Coolglass Wind Farm Limited	for a ten year permission, for development comprising the construction of a wind farm and related works. The development will consist of: Construction of 13 No. wind turbines within two clusters with an overall ground to blade tip height of 180m. The wind turbines will have a rotor diameter ranging from 155m to 162m inclusive and a hub height ranging from 99 to 102.5m inclusive. Construction of permanent turbine hardstands and turbine foundations. Construction of 1 no. permanent 110 kV electrical substation including 2 no. control buildings with welfare facilities, all associated electrical plant and equipment, security fencing and gates, all associated underground cabling, wastewater holding tank, and all ancillary structures and works. Construction of a 33kV collector cable circuit connecting the wind farm two clusters along the L3851/Knocklead Road Construction of two temporary construction compounds with associated temporary site offices, parking areas and security fencing. Development of one on-site borrow pit. Construction of new permanent internal site access roads, upgrade of existing internal site access roads, including passing bays and all associated drainage infrastructure Development of an internal site drainage network and	Refused by ACP on 23/08/2024 Decision Quashed by High Court and affirmed by Order of Supreme Court 18/03/2026 - Decision Pending	Refused - Quashed by High Court – New Reference –Decision Pending	13	27km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				sediment control systems. All associated underground electrical and communications cabling connecting the wind turbines to the wind farm substation. All associated site development works including berms, landscaping, and soil excavation. Improvement of a site entrance to an existing access off the L3851/Knocklead local road to include localised widening of the road and creation of a splayed entrance to facilitate the delivery of abnormal loads and turbine component deliveries. Improvements include removal of existing vegetation for visibility splays to facilitate the use of the access for the delivery of construction materials to the site. A new site entrance slip road from the L3851 / Knocklead local road to facilitate the delivery of abnormal loads and turbine component deliveries. Works at this location require the removal of existing forestry to facilitate the use of the access for the delivery of construction materials to the site and for use during the operational phase. Construction related temporary upgrade works on the turbine delivery route to facilitate the delivery of turbine components to include the use of temporary road surfaces at a roundabout at the southern exit of Junction 16 of the M7, the R425/N80 roundabout and the R426 – L3851				

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				junction. The erection of a permanent meteorological mast 102.5m in height A 35-year operational life from the date of commissioning of the entire proposed development.				
ACP Case Ref. PC10.313780	Gathabawn Wind Farm	Kilkenny	Ecopower Developments	Windfarm development comprising between 13 and 18 wind turbines.	N/A	Proposed	12	2km
ACP Case Ref. PAX92.324370	Littleton Wind Farm	Tipperary	Littleton Wind Farm Designated Activity Company	The proposed Littleton Wind Farm comprising of 11 no. turbines and all associated works.	Application submitted to ACP on 15/06/2026 – Decision pending	Proposed	11	13km
LCC Pl. Ref. 25/60414 ACP Case Ref. PL11.323775	Seskin Renewables Wind Farm	Laois	Seskin Renewable Energy Limited	i. construct 2 no. wind turbines with an overall turbine tip height of 175 metres; a rotor blade diameter of 150 metres; and hub height of 100 metres, and associated foundations and hard standing areas; ii. Upgrade of existing tracks and roads and the provision of new site access roads; iii. Underground electrical and communications cabling connecting the wind turbines to a proposed 38kV on-site substation located in the townland of Ballynaslee Co. Kilkenny; iv. Accommodation works along the N77 National secondary road in the townland of Durrow Townparks,	Refused by LCC on 02/09/2025 Appealed to ACP on 29/09/2025 – Decision pending	Proposed	8	9km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				Co. Laois to facilitate the delivery of turbine components and other abnormal sized loads; v. Hedgerow Removal; vi. Biodiversity Management and Enhancement Plan measures (including establishment of new hedgerow, translocation of existing hedgerow and enhancement of existing hedgerow); vii. Spoil Management; viii. Site Drainage; ix. Operational stage site signage; and, x. All associated site development works, ancillary works and apparatus. A 10-year planning permission and 35-year operational life from the date of commissioning of the entire wind farm is being sought. An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) accompany this planning application.				
KCC Pl. Ref. 25/60418 ACP Case Ref. PL10.323759		Kilkenny	Seskin Renewable Energy Limited	For development at this site.The proposed development, subject of this application, will consist of: i. The construction of 6 no. wind turbines with an overall turbine tip height of 175 metres; a rotor blade diameter of 150 metres; and hub height of 100 metres, and associated foundations and hard standing areas; ii. A permanent 38kV substation compound (control building with welfare facilities, all associated electrical plant and apparatus, security fencing including vegetative screening, underground cabling, wastewater	Refused by KCC on 02/09/2025 Appealed to ACP on 29/09/2025 – Decision pending			

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				holding tank, site drainage and all ancillary works); iii. Permanent underground electrical (38kV) and communications cabling to the existing Ballyragget 110kV substation in the townland of Moatpark (including joint bays, communication and earth sheath link chambers and all ancillary works along the route); iv. Underground electrical and communications cabling connecting the wind turbines and meteorological mast to the on-site substation; v. A meteorological mast with a height of 100m above ground and associated foundation and hard-standing area; vi. Upgrade of existing tracks and roads and the provision of new site access roads; vii. All works associated with the upgrade of the existing agricultural access off the L58333 local road (including the installation of fencing and steel gates); viii. 2 no. temporary construction compounds (including temporary site offices and welfare facilities); ix. Accommodation works along the N77 National secondary road in the townland of Ballynaslee, Co. Kilkenny to facilitate the delivery of turbine components and other abnormal sized loads; x. A borrow pit; xi. Spoil Management; xii. Hedgerow removal; xiii. Biodiversity Management and Enhancement Plan measures (including establishment				

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				of new hedgerow, translocation of existing hedgerow and enhancement of existing hedgerow); xiv. Site Drainage; xv. Operational stage site signage; and, xvi. All associated site development works, ancillary works and apparatus. A 10-year planning permission and 35-year operational life from the date of commissioning of the entire wind farm is being sought. An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) accompany this planning application.				

2.7 Scoping and Consultations

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 January 2022 in order to determine the presence of telecommunications links or aviation assets traversing or located in close proximity to the Proposed Wind Farm. Table 2-8 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 January 2022. 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 May 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

The bodies engaged with at scoping stage are set out below in Table 2-5 and Table 2-6. Further to this, responses received from the scoping document circulated are set out in Table 2-7 below. Copies of all scoping responses received are included in **Appendix 2-1** of this EIAR. If further responses are received, the comments of the consultees will be considered, where applicable, in the construction, operation and decommissioning of the Proposed Project in the event of a grant of planning permission. The recommendations of the consultees have informed the scope of the assessments undertaken and the contents of the EIAR.

Table 2-5 Scoping List

Consultee	January 2022	May 2026
	Initial Scoping	Updated Scoping
An Taisce	No response received	No response received
Bat Conservation Ireland	No response received	No response received
BirdWatch Ireland	No response received	No response received

Consultee	January 2022	May 2026
	Initial Scoping	Updated Scoping
Coimisiún na Meán (replaced the Broadcasting Authority of Ireland)	19/01/2022	08/05/2026
Commission for Regulation of Utilities	No response received	No response received
Department of Agriculture, Food and the Marine	27/09/2022	14/05/2026
Department of Defence	23/09/2022	15/06/2026
Department of Housing, Local Government and Heritage	23/09/2022	12/05/2026
Department of the Environment, Climate and Communications	07/11/2022	15/06/2026
Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media	No response received	No response received
Department of Transport	13/06/2023	No response received
EirGrid	No response received	No response received
EMR Integrated Solutions	No response received	No response received
Environmental Protection Agency	No response received	No response received
Failte Ireland	No response received	09/06/2026
Forest Service	27/09/2022	13/05/2026
Gas Networks Ireland	No response received	No response received
Geological Survey of Ireland	07/11/2022	No response received
Health Service Executive	04/10/2022	No response received
Iarnród Éireann	No response received	05/08/2026
Inland Fisheries Ireland (South East)	30/09/2022	21/10/2026
Irish Air Corps	No response received	No response received
Irish Aviation Authority	04/10/2022	19/05/2026
Irish Peatland Conservation Council	No response received	No response received
Irish Red Grouse Association - Conservation Trust	No response received	No response received
Uisce Éireann	22/06/2023	24/06/2023, 26/06/2026
Irish Wildlife Trust	No response received	No response received
Kilkenny County Council- Environment, Roads, Heritage	17/11/2022	08/05/2026, 07/07/2026
Sports Ireland (formerly Irish Sports Council)	No response received	No response received
Southern Regional Assembly	23/09/2022	No response received
Sustainable Energy Authority of Ireland	No response received	No response received
NPWS	No response received	12/05/2026
Office of Public Works	No response received	11/05/2026
The Heritage Council	No response received	No response received
The Arts Council	No response received	No response received
Transport Infrastructure Ireland	10/07/2023	21/05/2026
Waterways Ireland	26/09/2022	No response received

Table 2-6 Telecommunication Scoping List

Telecommunications and Aviation Scoping		
No.	Consultee	Date of Response
1	2RN	20/01/2022, 08/06/2026
2	3 Mobile	26/01/2022, 12/05/2026
3	AirNav	No Response Received
4	Broadcasting Authority of ireland (BAI)	19/01/2022, 08/05/2026
5	EIR	21/01/2022, 12/05/2026
6	ENET	24/01/2022
7	ESB telecoms	No response received
8	Imagine Network	25/01/2022, 27/09/2022 and 12/05/2026
9	Irish Rail	05/08/2026
10	Towercom	19/05/2026
11	Viatel Ireland Ltd.	28/01/2022 and 01/02/2022
12	Virgin Media	12/05/2026
13	Vodafone	20/01/2022, 26/09/2022 and 18/10/2022

Table 2-7 Scoping List and Responses

Consultee	Date of Response	Response Summary Initial Scoping (2022)	Response Summary Updated Scoping (2026)	Addressed in Chapter
Department of Agriculture, Food and the Marine	Response received on 27th September 2022 and on 14th May 2026	2022: Stated that any tree felling or removal requires a separate Felling Licence before work begins. As the Proposed development is on forested land, attention should be paid to the deforestation, turbulence felling and the requirement to afforest alternative lands.	2026: Stated that any tree felling or removal requires a separate Felling Licence before work begins. As the Proposed development is on forested land, attention should be paid to the deforestation, turbulence felling and the requirement to afforest alternative lands.	Chapter 4 and 6
Department of Communications, Climate Action and the Environment	Response received on 7th November 2022 and on 15th June 2026	2022: DECC forwarded a response on behalf of Geological Survey Ireland (a division of the DECC). Provided datasets for use when conducting the EIAR, SEA, planning and scoping processes for developments, plans and policies.	2026: Recommended using available datasets from the Geological Survey Ireland website when conducting EIAR, SEA, planning and scoping processes for developments, plans and policies. Stated that there is a Groundwater drinking water abstraction (Balief Group Water Scheme) with a zone of contribution/source protection area within the wind farm site boundary. Design of the development will have to be cognisant of the scheme and the interactions between surface water and groundwater as well as run-off. Appropriate design should be undertaken by qualified and competent persons to include mitigation measures as necessary, such as SUDs or other drainage mitigation measures. Any excavation should ensure that	Chapter 4 and 8

Consultee	Date of Response	Response Summary Initial Scoping (2022)	Response Summary Updated Scoping (2026)	Addressed in Chapter
			groundwater flow within the zone of contribution to the groundwater abstraction points is not disrupted, resulting in diminished yields. Stated that given the nearby drinking water source, the effects of any potential contamination as a result of the project would need to be assessed.	
Department of Defence	Response received on 23rd September 2022 and on 15th June 2026	2022: Acknowledgement of email and stated consultation with Military will be conducted. No further comments.	2026: After consultation with Military authorities, the following observations were made: - The M8 route is identified as an Irish Air Corps low level route. The location of structures higher than 45m above ground within 3NM of the route centreline of low level routes should be considered. - The proposed wind farm may affect the Air Corps ability to access regional areas to the south especially in poor weather conditions. - The cumulative effect of renewable energy developments has the potential to impede the Irish Air Corps operability. - All turbines should be illuminated by Type C, Medium intensity, Fixed Red obstacle lighting with a minimum output of 2,000 candela to be visible in all directions of azimuth and to be operational H24/7 days a week.	Chapter 15

Consultee	Date of Response	Response Summary Initial Scoping (2022)	Response Summary Updated Scoping (2026)	Addressed in Chapter
			Obstacle lighting should be incandescent. If LED or other lighting types are used, should be a type visible to Night Vision equipment. Obstacle lighting must emit light at the near Infra-Red (IR) range of the electromagnetic spectrum, specifically at or near 850 nanometres (nm) of wavelength. Light intensity to be of similar value to that emitted in the visible spectrum of light. - In the event of negative impacts on future military radar systems, the owner will engage with the Department of Defence and will provide suitable mitigations as soon as practical.	
Department of Housing, Local Government and Heritage	Response received on 23rd September 2022 and on 12th May 2026	2022: Stated that in the event of observations a co-ordinated heritage-related response email from the Development Applications Unit (DAU) will be sent.	2026: Stated that the DAU represents the Department of Housing, Local Government and Heritage, coordinating responses/submission from National Parks and Wildlife Service, National Monuments Service, Underwater Archaeology Unit and Architectural Heritage. No further response.	Chapter 13 and 14
Failte Ireland	Response received on 9th June 2026		Attached a copy of Failte Ireland's Guidelines for the Treatment of Tourism in an EIA. The report gives guidance for those conducting Environmental Impact Assessment and	Chapter 5

Consultee	Date of Response	Response Summary Initial Scoping (2022)	Response Summary Updated Scoping (2026)	Addressed in Chapter
			compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism.	
Forestry Service	Response received on 27th September 2022 and on 13th May 2026	2022: Response through the Department of Agriculture, Food and Marine.	2026: Response through the Department of Agriculture, Food and Marine.	Chapter 4
Geological Survey of Ireland	Response received on 7th November 2022	Provided datasets for use when conducting the EIAR, SEA, planning and scoping processes for developments, plans and policies.		Chapter 8, 9, 11, 13, 14, 15
Health Service Executive	Response received on 4th October 2022	Provided general guidance and recommended documents for the relevant EIAR sections/chapters from a health perspective. Recommended the inclusion and assessment of the following matters: Public Consultation, Decommissioning of the Wind Farm, Siting and location of turbines, Noise and Vibration, Shadow Flicker, Air Quality, Surface and Ground Water Quality, Geological Impacts, Ancillary Facilities and overall Cumulative Impacts.		Chapter 5
Inland Fisheries Ireland (SouthEast)	Response received on 30th September 2022 and on 21st October 2026	Stated that the project is located in the Nore catchment, within the area of three surface water bodies; Gorteenahilla_010, Nuenna_010 and Nuenna_020, all within the Barrow-Nore SAC. States that all	Stated that the project is located in the Nore catchment, within the area of three surface water bodies; Gorteenahilla_010, Nuenna_010 and	Chapter 4 and 9

Consultee	Date of Response	Response Summary Initial Scoping (2022)	Response Summary Updated Scoping (2026)	Addressed in Chapter
		bodies are at risk and have Poor, Moderate and Moderate WFD Status respectively. There should be no deterioration to ecological status and all surface water bodies that are determined to be less than good must be restored to at least good status. - Stated that a comprehensive aquatic habitat map should be created and assessed, especially considering the Atlantic salmon and lamprey species. - Stated instream works must only occur between 1 July and 30 September. - Request that new water crossings be minimised and altered crossings must be upgraded. Stated Sustainable Drainage Systems (SuDS) ptinciples must be implemented. Recommends the inclusion of a CEMP, Emergency Response Plan (EMP) and a Surface Water Management Plan (SWMP).	Nuenna_020, all within the Barrow-Nore SAC. States that all bodies are at risk and have Poor, Moderate and Moderate WFD Status respectively. There should be no deterioration to ecological status and all surface water bodies that are determined to be less than good must be restored to at least good status. - Stated that a comprehensive aquatic habitat map should be created and assessed, especially considering the Atlantic salmon and lamprey species. - Stated instream works must only occur between 1 July and 30 September. - Request that new water crossings be minimised and altered crossings must be upgraded. Stated Sustainable Drainage Systems (SuDS) principles must be implemented. Recommends the inclusion of a CEMP, Emergency Response Plan (EMP) and a Surface Water Management Plan (SWMP). - State that biological and chemical monitoring should be undertaken throughout all phases of the project and are to be provided with ECoW contact details and immediately notified of any pollution incidents.	

Consultee	Date of Response	Response Summary Initial Scoping (2022)	Response Summary Updated Scoping (2026)	Addressed in Chapter
Irish Aviation Authority	Response received on 4th October 2022 and on 19th May 2026	2022: States that in the event of planning consent being granted, the IAA should be contacted to - Agree aeronautical obstacle warning light scheme for the wind farm development, - Provide as-constructed coordinates in WGS84 format together with ground and tip height elevations at each wind turbine location and; - Notify the Authority of intention to commence crane operations with at least 30 days prior notification of their erection.	2026: Recommends contacting AirNav Ireland to ensure construction process would have no impact on en route communication, navigation and surveillance equipment. Also suggests engaging with Department of Defence in regard to any implications for the safety of the helicopter operations in the general area. States that in the event of planning consent being granted, the IAA should be contacted to - Agree aeronautical obstacle warning light scheme for the wind farm development, - Provide as-constructed coordinates in WGS84 format together with ground and tip height elevations at each wind turbine location and; - Notify the Authority of intention to commence crane operations with at least 30 days prior notification of their erection.	Chapter 15
Kilkenny County Council	Response received on 17th November 2022, 8th May 2026 and on 7th July 2026	2022: Includes a report that consists of responses from Transport Infrastructure Ireland, Irish Aviation Authority and Irish water and the Kilkenny County Council Planning, Roads and Environment divisions.	2026: Acknowledgement of receival and includes report that consists of responses from Transport Infrastructure Ireland, Irish Water, Irish Aviation Authority and the Kilkenny County Council Planning, Roads and Environment Divisions.	Chapter 15

Consultee	Date of Response	Response Summary Initial Scoping (2022)	Response Summary Updated Scoping (2026)	Addressed in Chapter
National Parks and Wildlife Service	Response received on 12th May 2026		States that the DAU has forwarded the information to NPWS to review. No further response.	Not Applicable
Office of Public Works	Response received on 11th May 2026		States the scoping request was acknowledged.	Not Applicable
Southern Regional Assembly	Response received on 23rd September 2022	States the scoping request was acknowledged and forwarded to the planning revision for review. No further response.		Not Applicable
Transport Infrastructure Ireland	Response received on 10th July 2023 and on 21st May 2026	2023: States the requirement to maintain the capacity and safety of the existing road network. Recommends this be done by including relevant impact assessments, identifying haul routes, obtaining all necessary licenses, developing an underground grid connection, avoiding routing grid cables along national roads and following all applicable TII guidance.	2026: States the requirement to maintain the capacity and safety of the existing road network. Recommends this be done by including relevant impact assessments, identifying haul routes, obtaining all necessary licenses, developing an underground grid connection, avoiding routing grid cables along national roads and following all applicable TII guidance.	Chapter 12 and 15
Uisce Eireann	Response received on 22nd June 2023 and on 24th June 2026 and 26th of June 2026	2022: States that it cannot provide scoping for individual projects but provides general aspects of Water Services that should be considered in the scope of an EIAR. States review of the completed EIAR will occur during the planning process.	2026: States that the development is located within the drinking water abstraction catchment for the Kilkenny City (Troyswood) Water Supply and whilst the risk is low, it remains a sensitive receptor and therefore must be assessed. States the need to include hydrological and hydrogeological assessments, a CEMP, a ERP and states further general water considerations to be taken into account.	Chapter 15

Consultee	Date of Response	Response Summary Initial Scoping (2022)	Response Summary Updated Scoping (2026)	Addressed in Chapter
Waterways Ireland	Response received on 26th September 2022	No comment given as the area of the proposed Wind Farm development is not located within any Zone of Influence.		Not Applicable

Table 2-8 Telecommunications Scoping List and Responses

Telecommunications and Aviation Scoping					
No.	Consultee	Date of Response	Response Summary Initial Scoping (2022)	Response Summary Updated Scoping (2026)	Addressed in
1	2rn	Response received on 20th January 2022 and on 8th June 2026	2022: States they have an UHF off air link and request a 140m corridor and a protocol with the developer should the Proposed Development go ahead	2026: States that First Fresnel Zone will only be impinged if T9 and T10 are moved further north. States concern about risk of interference to broadcast services and therefore request a protocol be signed between 2rn and the developer should the Proposed development go ahead	Chapter 15
2	Broadcasting Authority of Ireland	Response received on 19th January 2022 and on 8th May 2026	States that BAI does not perform analyses of effect of wind turbines on FM networks but states that they are not aware of any issues from existing turbines to FM networks. Further states that the Proposed Windfarm Development is not located close to any existing or proposed FM transmission sites.	States that BAI does not perform analyses of effect of wind turbines or electrical substations on FM networks but states that they are not aware of any issues from existing turbines or substations to FM networks. Further states that the Proposed Substation is not located close to any existing or proposed FM transmission sites.	Not Applicable
3	Eir	Response received on 21st January 2022 and on 12th May 2026	2022: States that they have 6 transmission links within the proposed area that could be at risk and provides the end points of these transmission links. Requests that a buffer of 100 meters radius away from this transmission path when placing turbines and to send them on for further analysis on the Eir mobile and Eir fixed network	2026: States the buffer zone captured in 2022 are still valid for Eir links and do not need to be updated.	Chapter 15
4	Enet	Response received on 24th January 2022	2022: States that they have 6 transmission links within the proposed area that could be at risk and provides the end points of these transmission links. Requests that a buffer of 70 meters radius away from this transmission path when placing turbines		Chapter 15

Telecommunications and Aviation Scoping					
No.	Consultee	Date of Response	Response Summary Initial Scoping (2022)	Response Summary Updated Scoping (2026)	Addressed in
5	Iarnrod Eireann	Response received on 5th August 2026		States that no direct interface with railway property has been identified at this stage. The nearest operational railway is approximately 18km west of the proposed site, while the former Great Southern Railway corridor is approximately 11km east at its closest point. States that the proposed grid connection and turbine delivery routes will need further consideration from Iarnrod Eireann once finalised. Request any of the following be communicated: › Any grid connection or other services crossing or running close to railway/ CIÉ property › Any railway bridges or level crossings included on the turbine delivery or construction traffic routes › The proposed abnormal loads, vehicle arrangements and any loading, clearance or access constraints associated with railway bridges or level crossings	Not Applicable
6	Imagine Group Communications	Response received on 25th January 2022, 27th September 2022 and on 12th May 2026	January 2022: Initially states that although an Imagine site lies within the boundary, there are no present turbines located nearby. States if turbines are moved or added, a buffer will have to be implemented. September 2022: States they have one link at the Northern end of Killoshulan, provide data for it and request a 50m set back from the central path.	2026: States there will be no issues for Imagine.	Chapter 15
7	Three Ireland Ltd.	Response received on 26th January	2022: States they have 10 microwave transmission links traversing the area and that could potentially	2026: States the Proposed Development will have no effect on the transmission network and states as the Proposed	Chapter 15

Telecommunications and Aviation Scoping					
No.	Consultee	Date of Response	Response Summary Initial Scoping (2022)	Response Summary Updated Scoping (2026)	Addressed in
		2022 and on 12th May 2026	be affected, depending on turbine layout and provided link details.	Windfarm connection to the national grid will be via an underground cabling connection, there will be no impact on other MW links	
8	Towercom	Response received on 19th May 2026		No comment was given as the Proposed Project will not affect Towercom infrastructure	Not Applicable
9	Viatel Ireland Ltd.	Response received on 28th January 2022 and on 1st February 2022	January 2022: States that Viatel has a transmission site in proximity to Killoshulan and provides location. February 2022: States there will be no issues if most turbines are located to the east of the tower. Request that the three link path be avoided, requesting a 30m buffer between the centre of the path to each blade tip.		Chapter 15
10	Virgin Media Ltd	Response received on 12th May 2026		States the Proposed Development will have no impact on Virgin Media's wireless network.	Not Applicable
11	Vodafone Ireland Ltd.	Response received on 20th January 2022, 26th September 2022 and on 18th October 2022	January 2022: States they have 18 transmission links in the area of the Proposed Development and request a 30m buffer from the Fresnel Zone of the link in question. September 2022: requests to be mindful of three transmission links in the Proposed Development area. October 2022: Provides location of multiple links that are close to some Proposed turbines. Requests proposed dimensions to further investigate the impact.		Chapter 15

2.7.3 Other Consultations

2.7.3.1 Pre-Planning Meetings

2.7.3.1.1 *Kilkenny County Council*

First Pre-Application Meeting (Section 247)

Members of the project team and the Applicant met with representatives of KCC in accordance with Section 247 of the Planning Act via Microsoft (MS) Teams on the 7th of September 2022. Those in attendance were:

On behalf of KCC:

- Deirdre Byrne

On behalf of Agent and Applicant:

- Brian Keville - MKO
- John Willoughby - MKO
- Jonny Fearon - MKO
- Eoin McCarthy - MKO
- John Tierney - Killoshulan Renewable Energy Limited

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

- Introduction to the Proposed Project, the Applicant and the project team
- Overview of the Site location and site selection process
- Proposed Wind Farm design, Proposed Grid Connection design, and the proposed haul route
- Site constraints, environmental designations, and habitats
- Surveys completed to date
- Environmental Impact Assessment Report
- Landscape and Visual Impact Assessment
- Planning policy context
- Proposed Project timeline

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

- National planning policy context
- Local planning policy context including the Draft Ministerial Direction and the Wind Energy Strategy
- Significance of overriding public interest
- Permitted works to the N77 and the Proposed Grid Connection Route
- Scoping, community consultation and community benefit
- Site constraints
- Ecology
- Landscape and visual
- Archaeology
- Planning application contents

Second Pre-Application Meeting (Section 247)

Members of the project team and the Applicant met with representatives of KCC in accordance with Section 247 of the Planning Act via MS Teams on the 17th of June 2026. Those in attendance were:

On behalf of KCC:

- Deirdre Breen
- Owen Shine
- Shane Wall

On behalf of Agent and Applicant:

- Francesca Rowson– MKO
- Mike Amiel Mekell– MKO
- Eoin McCarthy – MKO
- Jonny Fearon – MKO
- Neil O'Brien – Killoshulan Renewable Energy Limited
- John Tierney – Killoshulan Renewable Energy Limited

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

- Introduction, Agenda, Proposed Project progress, and the previous pre-planning meetings held with KCC and ACP
- Need for the Proposed Project to achieve European and national targets
- SID policy context, RED III, national, regional and local policy, KCCDP (as varied) Wind Strategy Areas
- Community benefit and engagement
- Site background, Proposed Wind Farm and the Proposed Grid Connection
- Site selection and constraints
- Proposed Grid connection route
- Designated sites and biodiversity
- EIA Scoping exercise, connectivity to designated sites and biodiversity
- Ornithology, including key ornithological receptors and potential impacts
- Water
- Geology and karst investigations
- Noise and shadow flicker
- Landscape and Visual Impact Assessment
- Other material assets, transport delivery route and temporary construction entrance
- Planning application documents and drawings
- Project timeline and conclusion

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

- Local planning policy context including the KCCDP (as varied) Wind Energy Strategy
- EIA Scoping exercise and KCC response
- Proposed Grid Connection route and construction methodology
- Groundwater considerations
- Drainage
- Noise monitoring and policy context
- Cumulative visual impact of the Proposed Wind Farm and exiting Wind Farms

2.7.3.1.2 *An Coimisiún Pleanála*

First Pre-Application Meeting (Section 182E & 37B)

The Applicant engaged with ACP, then An Bord Pleanála under the provisions of Section 182E of the Planning Act, as to whether the Proposed Grid Connection would meet the thresholds of the Seventh Schedule of the Planning Act. The Applicant opened pre-application consultations with ACP in July 2022 (ACP Case Ref. 314187) in relation to the Proposed Grid Connection which will facilitate the connection of the Proposed Wind Farm to the existing 110kV Ballyragget Substation in County Kilkenny.

The Applicant also engaged with ACP, under the provisions of Section 37B of the Planning Act, as to whether the Proposed Wind Farm would meet the thresholds of the Seventh Schedule of the Planning Act. The Applicant opened pre-application consultations with ACP in July 2022 (ACP Case Ref. 314186) in relation to the Proposed Wind Farm.

Members of the project team and the Applicant met with representatives of ACP in accordance with Section 182E and Section 37B via MS Teams on the 13th of October 2022 to discuss the Proposed Grid Connection and the Proposed Wind Farm, respectively. Those in attendance were:

On behalf of ACP:

- Sarah Caulfield
- Alaine Clarke
- Ciara Kellet

On behalf of Agent and Applicant:

- Brian Keville - MKO
- John Willoughby - MKO
- Gus McCarthy - MKO
- Jonny Fearon – MKO
- Mary Kelleher – MKO
- Eoin McCarthy – MKO
- John Tierney - Killoshulan Renewable Energy Limited

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

- Introduction from ACP and various procedures involved
- Introduction to the Proposed Project, the Applicant and the project team
- Description of SID criteria
- Policy context, Wind Energy Strategy, Draft Ministerial Direction, and Landscape Character Assessment
- Site Selection
- Design process
- Project timeline

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

- Planning strategy and justification, including submission of a Section 182A SID planning application for the Proposed Grid Connection and a Section 37E SID planning application for the Proposed Wind Farm
- Local planning policy context, Ministerial Direction, Wind Energy Strategy and the location of the Proposed Wind Farm turbines

- Archaeology
- Ecology and NIS
- Land, Soils and geology
- Cumulative Impact Assessment of Proposed Wind Farm and existing wind energy developments
- Proposed Wind Farm turbine specifications

Second Pre-Application Meeting (Section 37B)

Members of the project team and the Applicant met with representatives of ACP in accordance with Section 37B via MS Teams on the 22nd of June 2026. Those in attendance were:

On behalf of ACP:

- Ellen Moss
- Una Crosse
- Alaine Clarke
- Finbarr Quigley
- Fiona Patterson
- Maeve Maher-McWilliams

On behalf of Agent and Applicant:

- Francesca Rowson – MKO
- Mike Amiel Mekell – MKO
- Eoin McCarthy – MKO
- Neil O'Brien – Killoshulan Renewable Energy Limited
- John Tierney – Killoshulan Renewable Energy Limited

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

- Introduction to the Proposed Project, the Applicant and the project team
- Meeting Agenda, 1st pre-planning meeting and the Proposed Project progress to date
- Proposed Wind Farm and the Proposed Grid Connection
- Withdrawal of Section 182E pre-application consultation
- Community engagement undertaken to date
- SID planning policy context, RED III, national, regional and local policy, Wind Energy Strategy Areas, site level constraints, and the reduction of viable areas, with viable areas being within areas deemed as not normally permissible.
- EIA Scoping, pre-application consultation and public consultation
- Designated sites and biodiversity, river crossing, significant European sites
- Ornithology, stated importance of cumulative assessment for birds
- Hydrology
- Geology and karst investigations
- Noise and shadow flicker
- Landscape and Visual Impact Assessment
- Other material assets, traffic and transport, transport delivery route and proposed site entrance
- Proposed Project timeline

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

- Submission of the Proposed Project which comprises the Proposed Wind Farm and the Proposed Grid Connection under the provisions of Section 37E of the Planning Act
- Withdrawal of Section 182E pre-application consultation
- Inclusion of Battery Energy Storage System
- Further pre-application meetings

Third Pre-Application Meeting (Section 37B)

Members of the project team and the Applicant met with representatives of ACP in accordance with Section 37B via MS Teams on the 15th of September 2026. Those in attendance were:

On behalf of ACP:

- Una Crosse
- Alaine Clarke
- Finbarr Quigley
- Fiona Patterson
- Sinead White

On behalf of Agent and Applicant:

- Francesca Rowson – MKO
- Mike Amiel Mekell – MKO
- Eoin McCarthy – MKO
- Jonny Fearon – MKO
- Padraig Desmond – MKO
- Kathryn Sheridan – MKO
- Miriam Carroll – Tobar Archaeology
- David Broderick – Hydro-Environmental Services
- Neil O'Brien – Killoshulan Renewable Energy Limited
- John Tierney – Killoshulan Renewable Energy Limited

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

- Introduction to the Proposed Project
- Proposed Wind Farm and the Proposed Grid Connection
- Local Policy Context – Wind Energy Strategy Areas and Draft Ministerial Direction
- SID Criteria and Part 4, Chapter 4 of the 2024 Planning Act
- EIA Scoping and pre-application consultation
- Biodiversity, designated sites, and key ecological receptors
- Ornithology and key ornithological receptors
- Hydrology, hydrogeology, geology and karst
- Noise and shadow flicker
- Landscape and Visual Impact Assessment
- Cultural heritage
- Material assets, traffic and transport, other material assets and transport delivery route
- Planning Application Documents, Drawings, EIAR and NIS
- Proposed Project timeline

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

- Local Policy Context
- The Planning and Development Act 2024

- Climate Action Plan 2026
- Biodiversity, designated sites, and key ecological receptors
- Ornithology and key ornithological receptors
- Hydrology, hydrogeology, geology and karst
- Noise and shadow flicker
- Landscape and Visual Impact Assessment
- Cultural heritage
- Traffic and transport
- EIAR Chapters and Appendices
- Proposed Project timeline and the SID Determination

SID Determination

Following discussions during the first pre-application meeting with ACP, which was held under the provisions of Section 182E and Section 37B of the Planning Act, it was proposed to submit a single SID planning application for the Proposed Project which includes both the Proposed Wind Farm and the Proposed Grid Connection under the provisions of Section 37E of the Planning Act, subject to an SID determination from ACP. This proposal was discussed with ACP during the second pre-application meeting, which held under the provisions of Section 37B of the Planning Act. During this discussion the representatives of ACP advised that the Applicant should withdraw the Section 182E pre-application consultation request. On the 18th of August 2026, the Applicant issued a letter to ACP requesting the withdrawal of the Section 182E pre-application consultation request, ACP confirmed the withdrawal of the request in a letter from ACP dated the 19th of August 2026. As such, the SID planning application for the Proposed Project will be submitted to ACP in accordance with Section 37E of the Planning Act 2000.

A letter received from ACP dated the 9th October 2026 stated that under Section 37B, it is the opinion of ACP that the Proposed Project falls within the scope of the paragraphs 37A(2)(a) and (b) of the Planning Act. This confirmed that the Proposed Grid Connection constitutes SID and therefore the planning application should be made directly to ACP.

2.8 Community Consultation

The community consultation carried out 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.

To inform residents about the Proposed Project, Mark Higgins of MKO was appointed as Community Liaison Officer (CLO) on the project. In 2026, Declan Dooley of Morland Land Property Services Ltd took over the role as CLO on the project. The CLO had the responsibility for acting as the first point of contact for members of the public with questions or queries about the Proposed Project.

The CLO provided an introductory information pack which was delivered via door-to-door consultation to all householders within a c.1.5km radius of the Proposed Project site, in April 2026. The information distributed to each household consisted of a company brochure, which provided information on the project, such as the location of the development study area, the estimated project timeline and contact details. Residents were also given a feedback questionnaire (see Appendix 2) and asked to respond with any concerns or questions they may have. The questionnaire asked four questions about the development:

- If the proposed project is developed, what types of benefits should the Killoshulan Wind Farm provide to the local community?
- Do you have any concerns about this proposed wind farm and if so, what are they?
- Have you any further comments in relation to the proposed project?

- Killoshulan Renewable Energy Ltd is committed to keeping the local community informed about the proposed project. Please help us identify any other local groups which you feel should be consulted with.

Following the initial notification of the proposal to the local community, the CLO liaised with interested parties in helping them to understand the proposal and respond to any queries or concerns raised.

In August 2026, the project CLO recommenced a programme of 'door-knocking' and a leaflet drop, including an advertisement for the upcoming Public Information Event (PIE) to be held on Tuesday, September 1st, 2026. The venue chosen for the event was the Graine Community Hall, County Kilkenny, this location was chosen during feedback from the local residents closest to the proposed wind farm site. While revisiting all the houses within a 1.5km distance from the Proposed Project site, alongside all schools and GAA / sports clubs servicing the catchment area, and all local shops & business in the locality the CLO took this time to explain how the Proposed Project had evolved and how feedback from the first Door-to-Door event. The CLO also explained the channels available to the residents to get in touch with the project team remained available and encouraged those who wished to discuss the Proposed Project further to reach out via those channels.

In September 2026, following the feedback from the first PIE, there was supporting information uploaded to a Virtual Consultation Room on the project website to help provide further information on the main concerns raised at the PIE.

The process of community engagement has proven highly valuable as a means of identifying the key concerns of the local community in relation to the Proposed Wind Farm. The developers are committed to maintaining the strong community engagement approach throughout the post-application stage and, if planning permission is granted, will continue to consult with and be available to residents through the construction and operational lifespan of the Killoshulan Wind Farm.

The development of the Killoshulan Wind Farm will provide a direct and prolonged economic benefit to the communities surrounding the Proposed Wind Farm site through the Community Benefit Fund, and through employment opportunities during the construction process. 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 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 European Union or Member State level which are relevant to a proposed development or project. The factors to be considered in relation to cumulative effects include population and human health, biodiversity, land, soil, water, air quality, climate, material assets, landscape, cultural heritage, and major accidents / vulnerability to natural disasters, 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 potential cumulative impact of the Proposed Project and combined with the potential impact of other projects or plans has been carried out with the purpose of identifying what influence the Proposed Project will have on the surrounding environment when considered collectively with proposed and existing projects, projects pending a decision from the planning authority, projects in the public domain such as Strategic Infrastructure Development (SID) at pre-consultation with ACP, and land-uses in the vicinity of the Site location.

The cumulative impact assessment of projects has three 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 summarise the relevant projects which have a potential to create cumulative impacts.*
3. *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 nor indirectly contribute to cumulative impacts. (Note: this is done by individual competent 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 Projects Considered in the Cumulative Impact Assessment

2.9.2.1 Planning Applications and Permissions

A search was conducted using data from Kilkenny, Carlow, Laois and Tipperary County Councils and ACP's planning portals to search for all planned and/or permitted planning applications within 25km of the Proposed Wind Farm turbines. 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 by the EIAR team that cumulative impacts would not exist with any development proposed/permitted greater than 25km from the Proposed Wind Farm turbines.

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.

2.9.2.2 Wind Energy Developments within 25km of the Proposed Wind Farm Turbines

A planning search was carried out to establish proposed, permitted and existing wind energy developments within 25km of the Proposed Wind Farm turbines. The search was carried out using the relevant local authority and ACP databases in October 2026 for relevant planning applications. In total, 24 no. wind energy developments were identified within 25km of the Proposed Wind Farm turbines, 22 no. of which relate to proposed, permitted or existing multiple turbine wind farm developments and a

further 2 no. of which relate to proposed, permitted or existing single turbine developments. These are outlined in greater detail in Table 2-4 above.

2.9.2.3 EPA Licensed Activities

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 licensed 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.

2.9.2.4 Forestry Operations

The Proposed Wind Farm site comprises of commercial forestry, agricultural pastural land, mixed forest and transitional woodland-shrub. Current land-use along the Proposed Grid Connection comprises of public road corridor, public open space, agriculture, commercial forestry, land principally used by agriculture with significant areas of natural vegetation, mineral extraction sites, mixed forest and discontinuous urban fabric. This land-use will continue in conjunction with the construction, operation and decommissioning of the Proposed Project. The potential for cumulative effects during the construction, operational and decommissioning phases of the Proposed Project have therefore been assessed.

Forestry Felling associated with Proposed Project

The Forest Service is responsible for ensuring the development of Forestry within Ireland occurs in a manner and to a scale that maximises its contribution to national socio-economic well-being on a sustainable basis that is compatible with the protection of the environment. The forestry felling associated with the Proposed Project will be carried out under the relevant guidance and under licence from the Forest Service and full details are set out in Section 4.8.1.8 of Chapter 4 of this EIAR.

As described in Chapter 4 of this EIAR, permanent felling of commercial forestry will be required as part of the Proposed Project. The felling activities will be subject to a Limited Felling Licence application to the Forest Service in accordance with the Forestry Act 2014 and the Forestry Regulations 2017. The Forest Service policy requires that planning permission for the Proposed Project is available prior to determination of the associated felling licence application. Where replacement afforestation is required by the Forest Service as part of the felling licence process, the replacement afforestation lands will also be subject to the applicable statutory forestry consent process. The specific lands on which any such replacement afforestation would occur have not been identified at this stage.

It is also noted that the Forestry Service's Felling and Reforestation Policy provides for circumstances in which permanent forest removal may be permitted without a requirement for alternative afforestation, including where deforestation is justified by overriding environmental considerations and conversion to open habitat is necessary to benefit the habitat or species concerned. In the case of the Proposed Project, 27.5ha of permanent forestry removal are associated with ornithological offsetting and biodiversity enhancement. The applicability of this provision to the Proposed Project will ultimately be a matter for determination by the Forestry Service through the relevant felling licence process. Accordingly, the EIAR does not assume that an exemption will apply and, on a precautionary basis for the purposes of the environmental assessment, considers the potential effects associated with replacement afforestation on the basis that it may be required.

Replacement of Forestry

Where replacement afforestation is required, the replacement of forestry, felled as part of the Proposed Project, may occur on any lands, within the state, benefitting from Forest Service Technical Approval[30] for afforestation, subject to the spatial and hydrological criteria set out below and to the applicable statutory forestry consent process, should the Proposed Project receive planning permission. Under the Forestry Regulations 2017, all applications for licences for afforestation require the prior written approval (technical approval) of the Minister for Agriculture, Food and the Marine.

The requirements for afforestation licencing are set out in the Forestry Regulations 2017 - this includes consideration of Environmental Impact Assessment and Appropriate Assessment as set out in Part 7 and Part 8 of the Regulations, respectively. Further detail is set out in the Environmental Requirements for Afforestation (DAFM, 2016)[31]. This ensures that afforestation takes place in a way that complies with environmental legislation and enhances the contribution new woodlands and forests can make to the environment and to the provision of ecosystem services, such as water protection and landscape enhancement.

The typical environmental effects of afforestation include potential effects on biodiversity, soils and geology, hydrology and hydrogeology, cultural heritage, landscape and visual, and air and climate.

The Applicant is seeking a ten-year planning permission which incorporates time to secure a grid connection agreement, a route to market, select the preferred equipment suppliers and put the necessary capital funding in place to allow construction and delivery to commence. Thus, the identification of forestry replacement lands at this stage is seen as premature. If a licence for afforestation was obtained prior to seeking and/or obtaining planning permission, it is highly likely that any licencing approvals sought from the Forest Service would have expired before it could be taken up due to the time required for the planning processes and post-planning delivery preparations. The Forest Service Afforestation Licences expire after 3 years from when they are consented.

Furthermore, as mentioned above, the key environmental issues relating to afforestation include water, biodiversity, archaeology, and landscape. Each is subject to regular updates in terms of best practice, guidelines, standards and national policies. Delaying the identification of alternative afforestation lands until such time as they are required enables identification of optimum lands available (from an environmental perspective) for afforestation at that time. The EIAR identifies the relevant effect pathways and establishes binding spatial and hydrological parameters for future site selection, with the eventual site-specific assessment then undertaken through the statutory forestry consent process, if afforestation is required.

Notwithstanding that the specific replacement afforestation lands are not presently identified, the potential environmental effects associated with replacement afforestation have been considered within this EIAR. The cumulative study areas identified in Table 2-9 below have been established for the assessment of the Proposed Project and are specific to the nature of the potential effects being assessed within each EIAR topic. It is not therefore appropriate to apply each of these study areas automatically as an exclusion area for future replacement afforestation. In particular, cumulative study areas established for effects associated with wind turbines, including those relating to bats, ornithology and landscape and visual effects, do not necessarily represent the spatial extent of potential effects associated with afforestation.

The discipline-specific assessments undertaken in the EIAR have considered the realistic cumulative effect pathways associated specifically with replacement afforestation. These assessments identify 10km from the Proposed Wind Farm site as the maximum precautionary spatial extent within which cumulative effects associated with replacement afforestation could reasonably arise across the relevant

[30] *All proposed forestry developments where the area involved is greater than 0.1 hectare must receive the prior written approval of the Forest Service. The application for approval is known as Pre-Planting Approval – Form 1.*
[31] https://www.gov.ie/en/publication/642e6-forestry/#environmental-requirements

terrestrial receptors. Potential effects on the water environment are not appropriately defined by radial distance and are instead dependent on hydrological connectivity and, where relevant, temporal overlap.

On a precautionary basis, the Applicant commits that, where replacement afforestation is required, the replacement afforestation lands will be located at least 10km from the Proposed Wind Farm site and will not be located where there is a hydrological pathway through which the afforestation works could give rise to cumulative effects with the Proposed Project. On this basis, it is reasonable to conclude that there will be no more than imperceptible in-combination cumulative effects associated with the replacement afforestation.

The 10km spatial criterion represents the maximum identified spatial extent within which cumulative effects associated specifically with replacement afforestation could reasonably arise, having regard to the principal pathways through which replacement afforestation could potentially interact cumulatively with the Proposed Project including changes to habitats and habitat availability, disturbance or changes in suitability for fauna and birds, landscape and visual change and effects on the water environment associated with afforestation establishment and drainage.

In addition, the Applicant commits to not commencing the Proposed Project until the required felling licence(s), and where replacement afforestation is required, the associated afforestation licence(s), are in place. This will ensure that any required replacement afforestation lands are identified, assessed and licenced appropriately by the relevant consenting authority.

Further details in relation to the consideration forestry replanting is included in Section 4.8.1.8.1 of Chapter 4of this EIAR.

2.9.2.5 Land-Uses

Within the context of the cumulative study area for other plans and projects, the land-uses cover everything from agriculture to urban fabric. Land-use in the wider landscape of the Site comprises a mix of agriculture, quarrying, renewable energy, low density residential and commercial forestry. The Proposed Project has been considered in combination with other land uses in the surrounding area, such as those identified above and within the cumulative study area.

2.9.3 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 2-9 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 2-9 Cumulative Study Area

Individual Topic	Maximum Extent	Justification
Population & Human Health (including shadow flicker)	Population Study Area for (District Electoral Divisions) Shadow Flicker Study Area (10xRD (1.63km) buffer from Proposed Wind Farm turbines).	The Study Area for Population is identified in Section 5.2 in Chapter 5 as the Electoral Divisions where the Proposed Project is located. This Study Area considers the Proposed Wind Farm. This Study Area for Population identified is considered for cumulative effects on Population. For the assessment of cumulative shadow flicker, any other existing, permitted or

Individual Topic	Maximum Extent	Justification
		proposed wind farms are considered where their ten times rotor diameter shadow flicker study area are located within the Shadow Flicker Study Area of 1.63km (ten times the rotor diameter from Proposed Wind Farm turbines) for the Proposed Project.
Biodiversity – Flora & Fauna	10km from the Proposed Wind Farm site, and 250m from the Proposed Grid Connection site	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 species, is 10km for cumulative assessment for the Proposed Wind Farm site, and 250m from the Proposed Grid Connection site.
Biodiversity - Bats	15km from the Proposed Wind Farm turbines.	Bats are a mobile species which can cover large distances for foraging and roosting over a range of varied habitats. NatureScot (2021) *'Bats and onshore wind turbines - survey, assessment and mitigation'* recommends a 10km cumulative study area for bats. Bat Conservation Ireland (2026) *'Bat Survey, Assessment & Mitigation Guidelines for Onshore Wind Turbines in Ireland'* recommends an increased cumulative impact assessment zone of 15km. Therefore, on a precautionary basis, a 15km cumulative study area is considered for potential cumulative effects on bats.
Birds	25km from the Proposed Wind Farm turbines for large infrastructural development, such as wind farms, energy and public transport developments.	NatureScot (formerly SNH) 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 Wind Farm turbines was considered a reasonable approximation of the size of a county and a 25km radius of the Proposed Wind Farm turbines was considered a reasonable approximation for the local level.
Land, Soils and Geology	The 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	WFD Catchment for large infrastructural developments such as wind farms, energy	The cumulative Water Study area is delineated by the catchment of the Nore_SC_070 which has

Individual Topic	Maximum Extent	Justification
	and public transport developments. River Sub Basins for all smaller proposed, permitted or existing plans or projects (i.e. private and commercial type developments).	an area of approximately 155km^2. Downstream of the Nore_SC_070 (i.e. River Nore itself) no cumulative hydrological effects are likely due to the combined large upstream catchment area and the very high dilution effects afforded by such a large regional catchment (refer to Section 9.5.7 flow comparison in the Nuenna and Nore Rivers. The surface water catchment area of the River Nore upstream of the Nore_SC_070 sub-catchment is approximately 1,100km^2 (the River Nore upstream catchment is nearly 7 times that of the Nore_SC_070 sub-catchment).
Air Quality	Air Quality Study Area is 1km from the Site.	Given dust deposition impacts can occur for a distance of 250m from works areas (Assessment of Dust from Demolition and Construction, IAQM 2024) the geographical boundary for the cumulative dust impact is 1km.
Climate	The climate assessment has been considered on a national basis and not confined to a specific study area.	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	The list of wind farms which were initially considered in cumulative assessment extended to 10km of the Proposed Wind Farm turbines.	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 10 m/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).
Cultural Heritage	20km buffer from the Site.	Cumulative impacts on setting are more likely to occur at the operational stage of the development (i.e. post-construction). In this regard in order to assess overall cumulative effects on archaeology and cultural heritage the Proposed Project is considered in the context of other developments, in particular other permitted and proposed wind farms within 20km of the Proposed Wind Farm turbines. Direct effects for the Proposed Project are considered to be confined to within the EIAR Site Boundary and relate to construction effects.
Landscape & Visual	20km buffer from the Proposed Wind Farm turbines for Landscape and Visual effects (LVIA Study Area).	The Wind Energy Development Guidelines (DoEHLG, 2006) (the Guidelines (DoEHLG 2006)) require that "in areas where landscapes of national or international renown are located within 25km of a proposed wind energy development, the Zone of Theoretical Visibility should be extended as far (and in the direction of) that landscape". There are no landscapes of

Individual Topic	Maximum Extent	Justification
	15km from Proposed Wind Farm turbines for effects on landscape character (LCA Study Area).	national or international renown within 25km of the Proposed Wind Farm, and therefore the cumulative boundary for visual and landscape effects is reduced to 20km from the Proposed Wind Farm turbines. The LCA study area has been chosen as 15km for effects on Landscape Character Areas. Through experience conducting LVIA for other wind energy development projects, the assessment team determined that no significant effects on landscape character areas are likely to arise beyond distances of 15km from the Proposed Wind Farm turbines. Therefore, a LCA Study Area of 15km is deemed appropriate for effects on landscape character in relation to the assessment of effects upon designated Landscape Character Areas.
Material Assets: Traffic & Transport	25km buffer from Proposed Wind Farm turbines for large infrastructural developments such as wind farms, energy and public transport developments. Following that, the proposed transport route for each project is considered.	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) › 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 200m buffer from the Proposed Grid Connection route is deemed appropriate to capture other plans and projects with the potential for cumulative effects with the Proposed Project.
Material Assets: Telecoms	The list of wind farms and other projects which were initially considered in cumulative assessment extended to 25km from Proposed Wind Farm turbines.	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.

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 2-10 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**.

The maximum extent of each cumulative search buffer was determined by the largest specific cumulative study area buffer (25km from Proposed Wind Farm turbines), as shown in Table 2-9 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 2-9 above.

Table 2-10 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
Licenced Facilities	https://gis.epa.ie/EPAMaps/	EPA
Waste Schemes	https://gis.epa.ie/EPAMaps/ & MKO's interanl 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 October 2026. Therefore, plans and projects that were applied for after October of 2026 are not considered in the cumulative impact assessment.

To gather a comprehensive view of cumulative impacts within the cumulative study area and to inform the EIA process being undertaken by the consenting authority, each relevant chapter within the EIAR addresses the potential for cumulative effects where appropriate and within the context of their identified cumulative study area. A long list of projects considered (i.e., the largest cumulative study boundary of 25km list) across all disciplines in their cumulative impact assessment is included in **Appendix 2-3**.

2.9.3.1 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 land uses within the cumulative study area. Existing land uses within the cumulative study area include ongoing agricultural and forestry practices.

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.

APPENDIX 2-1

COPY OF SCOPING RESPONSES

APPENDIX 2-2

COMMUNITY ENGAGEMENT REPORT

APPENDIX 2-3

PROJECTS CONSIDERED IN THE CUMULATIVE IMPACT ASSESSMENT