TOBIN

Rooaunalaghta Green Energy Project

Planning Statement

October 2026

ROOAUNALAGHTA
Green Energy

BUILT ON KNOWLEDGE

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EXECUTIVE SUMMARY

This Planning Statement has been prepared in support of a planning application for permission for the proposed Rooaunalaghta Green Energy Project.

The Proposed Development comprises 13 no. wind turbines with a blade tip height of 150 m, associated turbine foundations and hardstands, site access infrastructure, internal tracks, drainage systems, an on-site control building, a permanent loop-in 110 kV electrical substation, underground electrical infrastructure, a borrow pit, construction compounds, a lidar unit and all ancillary works required to facilitate the construction and operation of the project.

The Proposed Development represents a significant renewable energy infrastructure project that will contribute to national, regional and European renewable energy and climate action objectives. The development will increase the supply of indigenous renewable electricity, support the decarbonisation of the national electricity network and by doing so, directly assist in meeting Ireland's legally binding climate and renewable energy commitments.

The proposed wind farm has been designed following detailed technical, environmental and engineering assessments and has been informed by an iterative design process. This process has sought to maximise renewable energy generation whilst avoiding, reducing and mitigating potential environmental effects. The proposal is supported by extensive environmental and technical documentation, including assessments relating to ecology, ornithology, landscape and visual impact, hydrology, archaeology, noise, traffic and transportation, and cultural heritage.

The project also includes substantial grid infrastructure, comprising a new loop-in 110 kV substation and associated underground electrical connections, which are necessary to facilitate the efficient integration of renewable energy into the national electricity network. The development therefore contributes not only to renewable electricity generation but also to the strengthening and modernisation of strategic electricity infrastructure in the region.

While a portion of the site is now identified as "Unsuitable" within the recently adopted Mayo Renewable Energy Strategy, having been changed from "Open to Consideration" under the previous Renewable Energy Strategy, this Planning Statement demonstrates that this designation does not constitute a prohibition on development and must be considered alongside all other material planning considerations, including national renewable energy policy, the Commission's statutory section 15 climate obligations and the site-specific environmental characteristics of the proposal. The designation forms only one element of the overall planning assessment and does not negate the requirement to undertake a comprehensive evaluation of the Proposed Development on its merits.

Having regard to the scale and quality of the renewable energy resource, the strategic importance of the development, the detailed environmental assessments undertaken, and the extensive mitigation measures proposed, it is concluded that the development constitutes appropriate and sustainable development and is consistent with the proper planning and sustainable development of the area.

1. INTRODUCTION

This Planning Statement has been prepared by TOBIN on behalf of Rooaunalaghta Green Energy Limited, a subsidiary of Greensource Sustainable Developments Limited (hereafter referred to as 'GreenSource' or the 'Applicant') to accompany a planning application for the proposed Rooaunalaghta Green Energy Project, which comprises the development of a 13-wind turbine wind farm and associated grid infrastructure.

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

The Proposed Development will include thirteen (13) wind turbines with a tip height of 150 m and a rotor diameter of 136 m. The electrical output is expected to be 58.5 MW, thus exceeding 7th Schedule threshold of 50 MW in the Planning and Development Act, 2000 (as amended) which therefore deems this element 'Strategic Infrastructure Development' (SID).

The Proposed Development also includes a 110 kV loop-in Substation compound, an underground 33 kV grid connection which will loop-in from the proposed Substation to an existing adjacent overhead line, a new on-site control building, 2no. temporary construction compounds, 1no. borrow pit and 1no. Lidar Unit, as well as all associated site and development works.

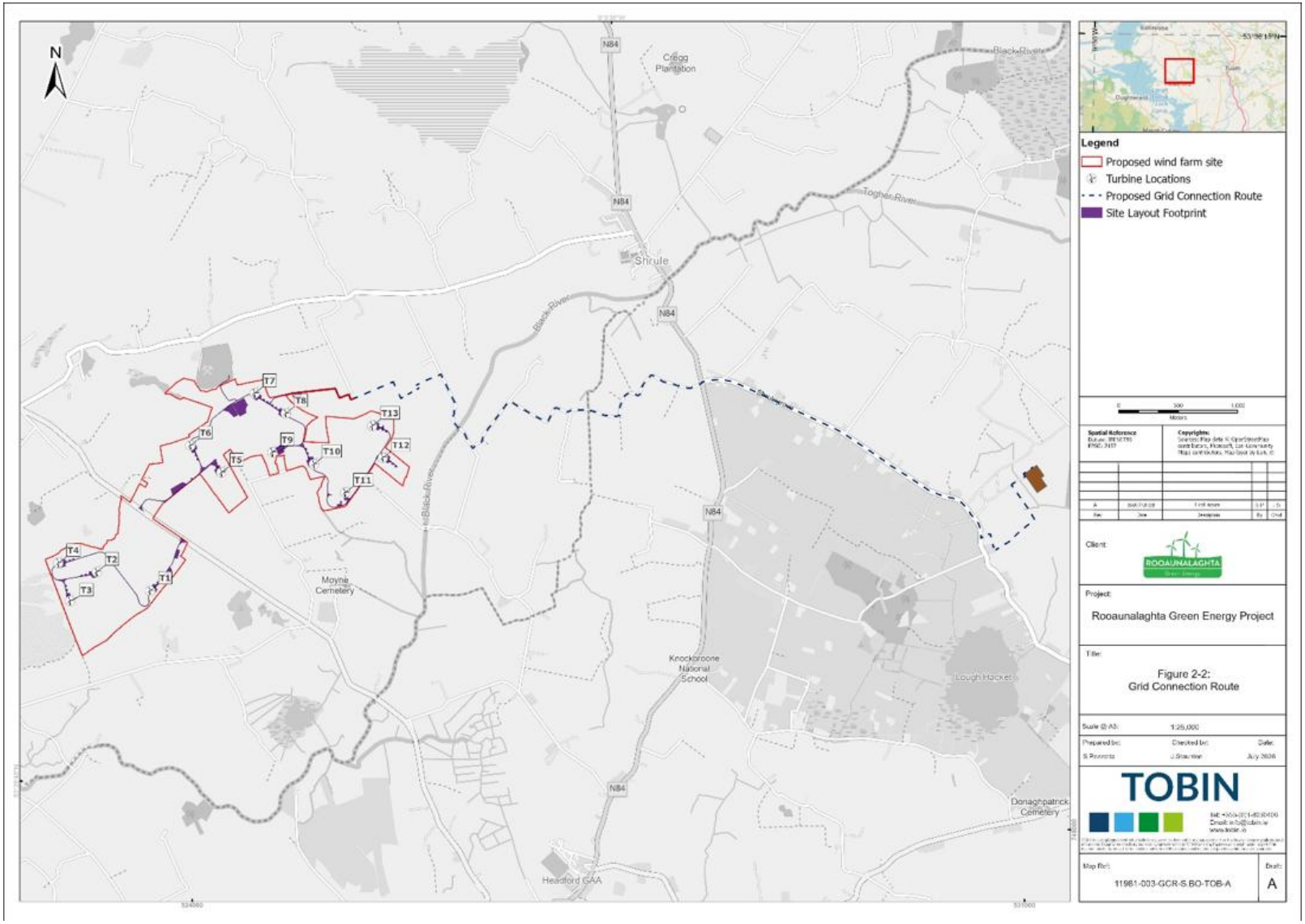
The relevant global, European, national and regional climate, energy and planning policies as set out in this report emphasise the need to generate renewable energy and the importance of moving towards decarbonising the economy.

The Proposed Development will contribute significantly to Ireland's transition away from imported fossil fuels. In 2024, fossil fuels accounted for over 80% of Ireland's energy supply, with oil alone comprising nearly half. The Proposed Development has the potential to produce up to 149,638 MWh (Megawatt hours) hours of electricity per year, equivalent to the annual electricity use of 34,125 Irish households, which will increase the share of domestically produced renewable energy and reduce reliance on carbon-intensive imports.

The Proposed Development, with its installed capacity of 58.5 MW, directly supports this goal. Wind energy already accounts for over 33% of Ireland's electricity supply and has driven significant emissions reductions. This Proposed Development will accelerate progress toward national and EU climate targets.

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

Figure 1-1 - Site Location Map



1.1 STATEMENT OF AUTHORITY

This report has been prepared having regard to applicable national, regional and local planning and environmental policy frameworks. It draws upon current government strategies, including the Climate Action and Low Carbon Development Act 2015 (as amended) and the Climate Action Plan (CAP25). It is based on the most up-to-date policy documents at the time of preparation of this report. The report has been compiled by Daniel Nestor, Senior Planner (B.A. in English and Geography, Masters in Planning and Sustainable Development, Advanced Diploma in Planning and Environmental Law), with over 8 years of experience working as a professional planner in residential, mixed-use, commercial and renewables sectors and Louise Byrne, Lead Planner, BA (International) in Geography and Masters in Regional and Urban Planning. Louise has over 11 years' experience working as a professional planner, working in Local Government and private consultancy roles in both Ireland and the UK.

2. PROJECT DESCRIPTION

This section of the report describes the Proposed Development as set out in the public notices, as well as the location of the subject site and associated planning history.

2.1 PROPOSED DEVELOPMENT

The project involves the provision of 13 Wind Turbines and associated grid infrastructure as part of a proposed wind farm repowering project. As such, the Rooaunalaghta Green Energy Project could potentially produce an output of 58.5 MW.

The project will involve all associated infrastructure including turbine foundations, hardstanding areas, borrow pits, access tracks, a 110 kV loop-in substation, and an underground grid connection to a proposed 110kV Substation with a loop-in connection to an existing overhead line.

For reference, below is a development description of the Proposed Development as per the Public Notices submitted as part of this planning application:

- 13 no. wind turbines with a blade tip height of 150 m, a rotor diameter of 136 m, a hub height of 82 m, and all associated foundations and hard-standing areas in respect of each turbine;
- Creation of two new permanent site entrances onto the R334 Regional Road;
- Two temporary construction compounds with associated temporary site offices, parking areas and security fencing;
- One borrow pit. All works associated with the opening, aggregate and spoil extraction, and decommissioning of the borrow pit;
- New internal site access tracks, to include passing bays and all associated drainage;
- A temporary new access track to connect to the boundary of an adjacent operating quarry;
- Construction of drainage and sediment control systems;
- New on-site control building
- Construction of one permanent loop-in 110 kV electrical substation compound including
    - Two control buildings containing worker welfare facilities;
    - Electrical infrastructure and grid ancillary services equipment
    - Parking
    - Lighting
    - Fencing
    - Wastewater holding tank

    - Rainwater harvesting equipment
    - Communications equipment and storage
    - Associated electrical plant
    - All associated infrastructure, services, and site works including landscaping
- All works associated with the connection of the proposed wind farm to the proposed 110 kV loop-in substation, which will be via a 33 kV underground cable connection (circa 8.7 km in length), including 4 no. watercourse crossings, and the onward connection from the substation to the existing overhead line via 110 kV cables and steel lattice interface masts;
- All associated infrastructure and services including site works, signage and permanent underground electrical and communications cabling connecting the wind turbines to the proposed wind farm control building;
- A lidar unit, and associated foundation and hard-standing area;
- All related site works and ancillary development including site drainage, security gates, fencing, permanent and temporary signage, berms, landscaping, soil excavation and biodiversity mitigation and enhancements, including habitat, hedgerow and treeline removal, creation and management.

2.2 Site Location

The proposed wind farm site is located within the townlands of Cloghmoyne, Carrowoughteragh, Toorard, Rooaunalaghta, Brodullagh South and Kinlough, County Mayo.

The proposed underground 33 kV GCR associated with the grid connection traverses the townlands of Brodullagh South, Kinlough, Cloonbanaun, County Mayo, and the townlands of Largan, Joyce's Park, Shrulegrove, Carrowmore, Tonacooleen, Ralusk, Abbeytown, Ballinvoher, Killamanagh and Bunnasillagh, County Galway.

The proposed 110 kV loop-in substation and associated 110 kV cables and end masts to connect to the existing overhead line are located in the townlands of Killamanagh and Bunnasillagh, County Galway (the substation itself is within the former townland).

In terms of proximity to Natura Sites, the site is hydrologically linked to the Lough Corrib Special Area of Conservation (SAC) located approximately 2.9km to the west of the site. The site also borders the Cloughmoyne SAC immediately adjacent to the west of the site.

In general terms, the area surrounding the site can be described as rural with a dispersed settlement type.

Figure 2-1 - Site Layout Plan of proposed Wind Farm

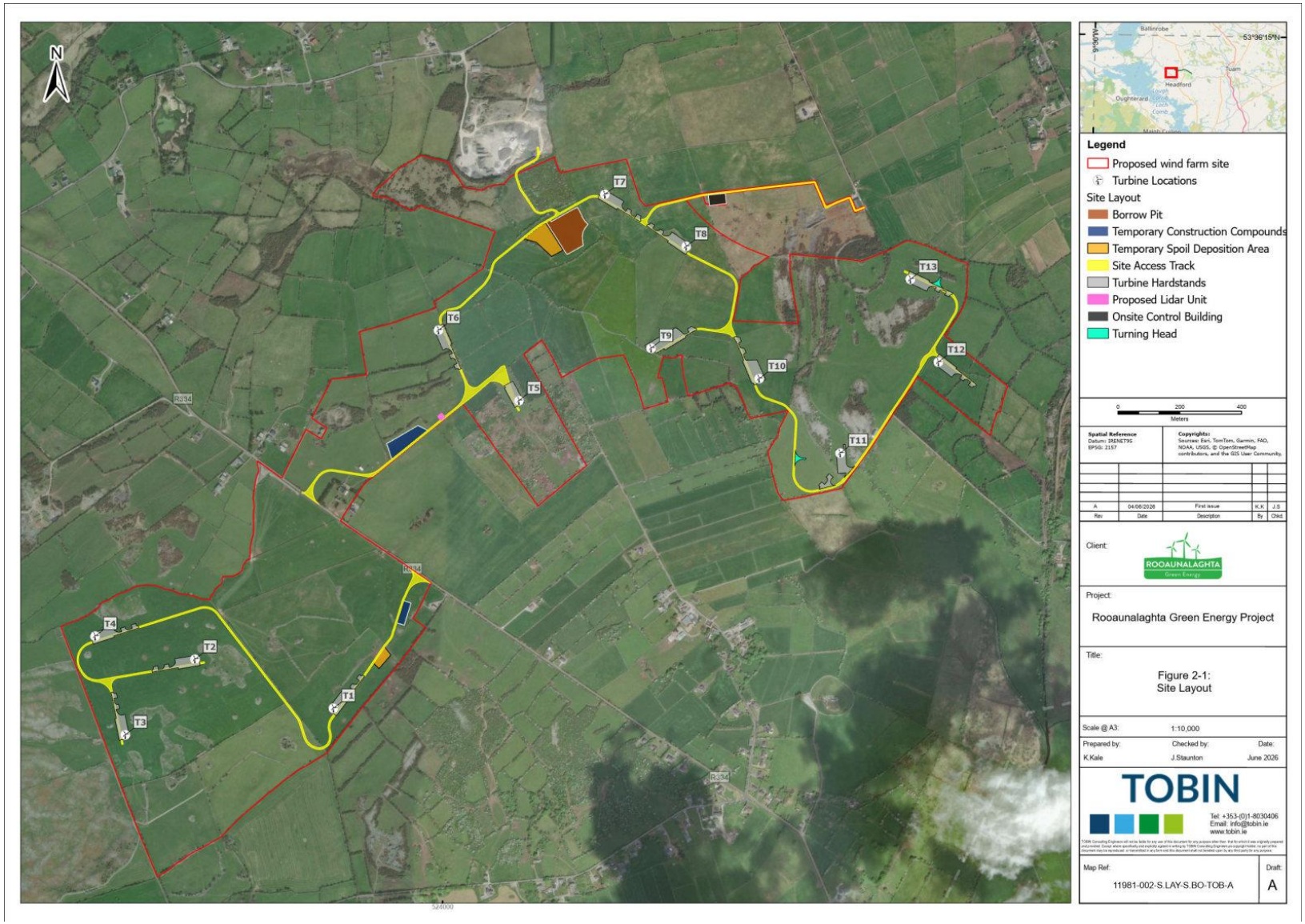
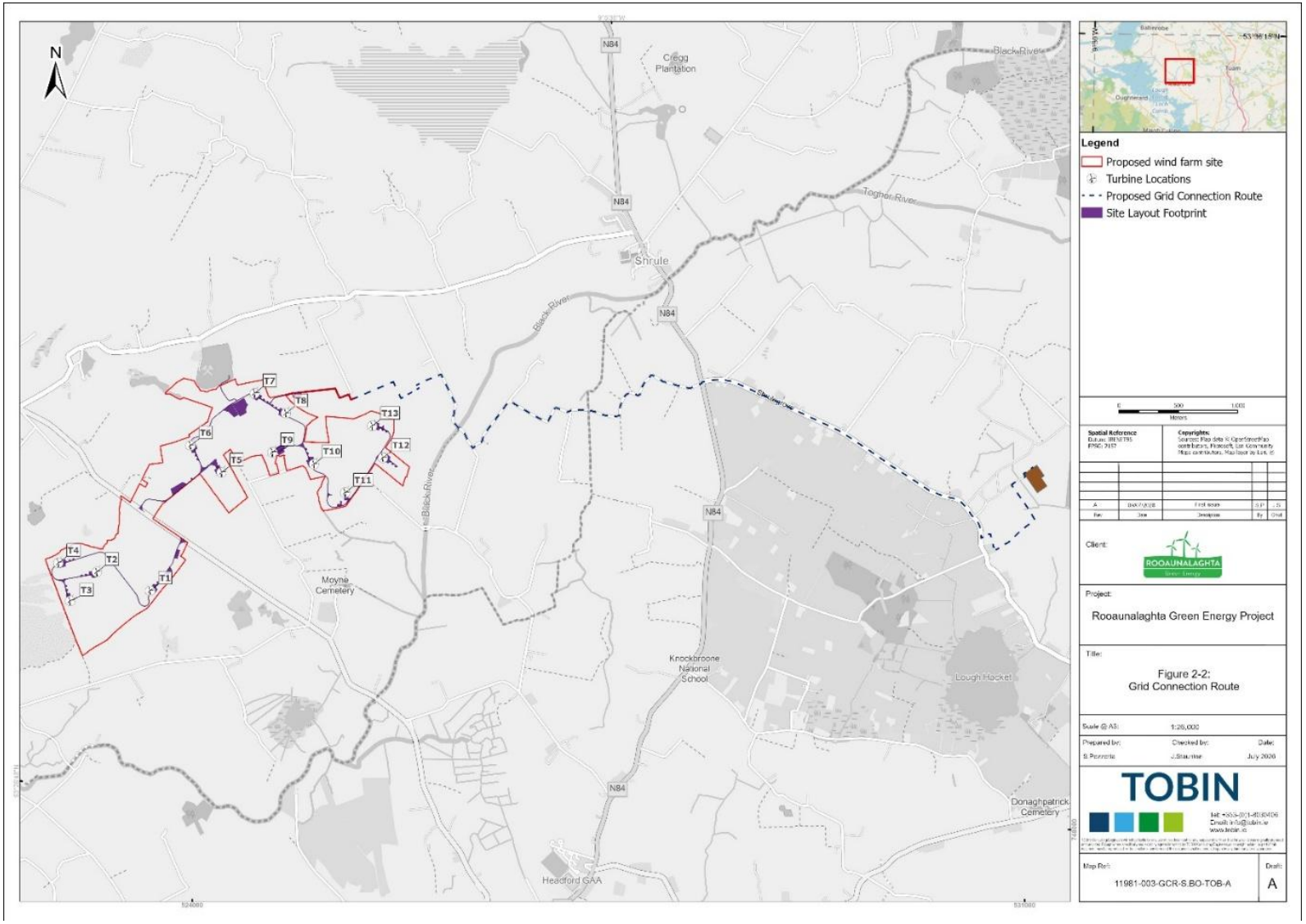


Figure 2-2 - Proposed Grid Connection Route



2.3 Planning History of the Subject Site

A review of online planning portals shows all the current and past planning applications located in and surrounding the site boundary. Following a review undertaken on 27th October 2026 on Mayo County Council's online application database, the Galway County Council database and the ACP database, an extensive planning history search has been carried out.

Appendix A of this planning statement includes 10-year planning history searches for applications within the wind farm site and grid connection route, as well as large-scale / infrastructure applications within a 10km radius. Please refer to Appendix A for further detail.

2.4 Pre-Application Consultation

A total of 3 no. Pre-Application Consultation meetings were undertaken with An Coimisiún Pleanála (ACP), and a summary of each meeting is presented in Table 2.1 below. In addition, a pre-planning consultation meeting was also undertaken with Mayo County Council on 18th August 2026 and the NPWS on 19th August 2026.

Table 2-1 - Summary of key issues raised during Pre-Application Consultation Meetings with An Coimisiún Pleanála, Mayo County Council and NPWS

First Pre-Application Meeting with An Coimisiún Pleanála (held on 26/05/2026)
Key issued raised: **General Matters:** • ACP advised that a Design Flexibility request is required for the electrical infrastructure elements (Note: that design proposals included more than one grid connection route at this time. The proposed development as submitted relates to one grid connection only). • ACP recommended reviewing other wind farm applications in the area to identify issues raised in those projects to ensure they are considered and assessed in the application documentation accompanying this development • ACP advised that the proposed access road from the adjoining quarry should be addressed fully in the application documentation **Policy:** • Discussion held of current Mayo County Council Renewable Energy Strategy – the site is located in a 'Tier 2 – Open for Consideration' area • Noted that a Draft Renewable Energy Strategy is currently at Public Consultation stage **Hydrology & Hydrogeology:** • Discussion held on issues raised in submissions on previous wind farm applications, levels of studies undertaken so far, bedrock and groundwater studies • ACP outlined that a robust Water Framework Directive assessment would likely be required • These items are to be addressed at a further meeting with ACP

Biodiversity:

- Advised to consult with NPWS and to ensure robust collision risk assessment is completed
- Advised to ensure most up to date guidance for surveys and assessment be included in accompanying EIAR and AA documentation
- ACP requested that robust methodological approach is required in assessing impacts on birds within Proposed Development site

Landscape and Visual:

- Additional viewpoints may be required
- Cumulative impacts with other wind farms in the area and within vicinity of Lough Corrib, Co. Galway were recommended to be assessed

Next Meeting:

- It was advised that the next meeting would focus on Biodiversity, Ornithology, Hydrology and Hydrogeology

Outcome and recommendations:

- An Coimisiún Pleanála provided initial guidance on key considerations for the EIAR and associated environmental considerations points that they wanted to see addressed therein. It was advised that the next meeting would focus on matters related to Biodiversity, Ornithology, Hydrology and Hydrogeology

Second Pre-Application Meeting with An Coimisiún Pleanála (held on 27/07/2026)

Key Issued raised:

Hydrology & Hydrogeology

- Site Investigation (SI), groundwater depths, consultation with bodies (OPW, NPWS, IFI) discussed
- Karst features and groundwater protection discussed and the use of aquatic surveys to inform mitigation
- Importance of Surface Water Management Plan and linking assessment to the SI

Ornithology

- Greenland White-fronted Goose, Wintering Waterbirds, Gulls, Golden Plover and Hen Harrier discussed. Possibility of obtaining some detailed flightpath data discussed.
- Low collision risk for all species noted. Rationale for determining which species are included/excluded from CRM analyses to be provided. NPWS consultation discussed.
- Use of monitoring where uncertainties and/or residual effects occur noted.

Biodiversity

- Recommended that the assessment of impact on badgers includes consideration of maintaining commuting corridors

- ACP recommend calculating all habitat loss and considering indirect habitat loss via air quality and water. Also recommend engaging with NPWS and IFI.
- ACP recommend using data to back up assessments and proposed mitigation

Outcome and recommendations:

- An Coimisiún Pleanála provided guidance on a number of matters to be addressed within the EIAR and NIS, including the need for robust hydrogeological and ecological assessments, comprehensive mitigation proposals, and clear justification of ecological conclusions. Particular emphasis was placed on cumulative ornithological effects, habitat management measures, consultation with prescribed bodies and the supporting evidence required to demonstrate the effectiveness of proposed mitigation.

Pre-Application Meeting with Mayo County Council (held on 18/08/2026)

Key Issued raised:

- The meeting provided an opportunity to introduce the project, planning context and progress made across all technical disciplines.
- Strong policy support was identified through national climate policy, the Northern and Western RSES and the Mayo County Development Plan 2022-2028. The updated Renewable Energy Strategy was also discussed in detail during this meeting.
- Significant environmental baseline work had already been completed, including ornithology, ecology, hydrology, archaeology, noise and landscape assessments.
- A comprehensive community engagement programme had been established, including community clinics, project information materials and stakeholder consultation.
- The Council was presented with a project that aligns strongly with renewable energy and climate action objectives at national, regional and local level.

Outcome and recommendations:

- Overall, the engagement was positive and constructive, with the project presented as a strategically important renewable energy development supported by a substantial evidence base.

Pre-Application Meeting with NPWS (held on 19/08/2026)

Key Issued raised:

- NPWS were provided with a detailed overview of the ecological and ornithological assessments undertaken to date.

- The project team demonstrated that previous NPWS scoping comments had been addressed through additional surveys, data review and assessment work.
- Extensive ornithological assessment was presented, including three years of surveys, 1,516 hours of VP monitoring and detailed SPA connectivity analysis.
- Greenland White-fronted Goose was identified as the principal ornithological receptor, however surveys indicated very limited use of the site, with no significant feeding areas, roost sites or movement corridors identified within the development footprint.
- The project layout was designed to avoid direct impacts on priority Annex I habitats, supported by detailed habitat, bat and ecological surveys.
- Aquatic ecology investigations were completed across nearby SACs and receiving waters, demonstrating a comprehensive baseline assessment programme.
- Overall, the meeting reinforced the robustness of the ecological assessment process and the constraints-led approach adopted in the project design.

Outcome and recommendations:

- NPWS generally agreed with the assessment approach and noted that the ornithological evidence presented was largely complete. They advised that the EIAR should consider dawn, dusk and night-time movements of geese. They also emphasised the importance of applying the mitigation hierarchy, providing robust justification where impacts on Annex I habitats cannot be avoided, and ensuring that any habitat offsetting proposals are technically feasible and directly related to the habitats affected.

Third Pre-Application Meeting with An Coimisiún Pleanála (held on 31/08/2026)

Key Issued raised:

Hydrology & Hydrogeology

- Additional geophysical investigations had been undertaken across turbine locations and the proposed substation, with results generally consistent with previous site investigation findings.
- Karst features remained a key consideration and a dedicated karst management protocol was proposed to inform the design and construction process.
- Surface water drainage design was refined based on updated geophysical information, with ongoing flow monitoring and well surveys being undertaken.
- Continued consultation was being undertaken with local stakeholders, including the Glencorrib Group Water Scheme, to inform the assessment and mitigation approach.

Ornithology

- A meeting was held with NPWS, with Greenland White-fronted Goose confirmed as the principal ornithological receptor for the assessment.
- Additional NPWS records and a fourth non-breeding season of survey data were incorporated into the assessment.
- Detailed review of flight activity, SPA connectivity and movement pathways was completed.

- Assessment conclusions remained unchanged, with surveys identifying very limited use of the site by Greenland White-fronted Goose and no evidence of important feeding, roosting or movement functions within the wind farm footprint.

Biodiversity

- Aquatic ecology surveys were expanded to include electrofishing and eDNA investigations to further inform the assessment.
- Targeted bryophyte surveys confirmed the presence of characteristic stone wall species only, with no rare or protected species recorded.
- Additional assessment work was undertaken on turlough habitats, together with butterfly surveys across the site.
- Ongoing ecological surveys continued to strengthen the evidence base supporting habitat, species and mitigation assessments.

Noise & Vibration

- Noise assessment confirmed compliance with applicable noise criteria at the majority of assessed receptors.
- Four locations were identified where turbine curtailment would be required to ensure compliance.
- A detailed curtailment strategy was being developed as part of the mitigation approach.
- Commitments were provided regarding operational monitoring, compliance verification and management of any future noise complaints.

Landscape & Visual

- Baseline photography and draft photomontages had been completed for the LVIA assessment.
- Thirty-two representative viewpoints were selected across the study area to assess visual effects.
- The most notable visual effects were identified within the immediate vicinity of the site, with effects reducing with distance.
- Potential cumulative effects were regarded as limited under the current cumulative scenario, with greater consideration required for future cumulative development scenarios.

Cultural Heritage

- A detailed assessment of archaeological, architectural and cultural heritage receptors within the study area was completed.
- Potential direct impacts were identified for a limited number of archaeological features located within or close to development infrastructure.
- Geophysical investigations and archaeological testing were proposed to further inform impact assessment and mitigation requirements.
- Potential operational effects on the setting of heritage assets were acknowledged and assessed within the cultural heritage chapter.

Material Assets & Infrastructure

- Turbine delivery route assessment was completed and identified only one location requiring minor temporary works, together with minor vegetation trimming and signage removals.

- The grid connection route design was substantially completed with only limited refinements ongoing.
- Telecommunications and aviation assessments identified manageable impacts subject to standard mitigation measures.
- Traffic and transport assessments indicated that abnormal load delivery could be achieved with minimal mitigation requirements.

Planning Policy & Consultation

- Strong national, regional and local policy support for renewable energy development was presented.
- The implications of the Planning and Development Act 2024 and the recently adopted Mayo Renewable Energy Strategy were discussed.
- Consultation had been undertaken with Mayo County Council, NPWS and local stakeholders, including the Glencorrib Group Water Scheme.
- ACP were updated on the extensive consultation and community engagement programme completed to date

Outcome and recommendations:

- ACP reviewed the developing application and provided recommendations regarding the content, consistency and completeness of the EIAR, NIS/AASR and supporting documents, with particular emphasis on biodiversity and ornithology assessments, cumulative impact assessment, habitat mitigation and enhancement measures, policy compliance, and clear presentation of project information. These recommendations have been incorporated into the final planning application as submitted.

In addition to the above, Galway County Council were also consulted in relation to the Proposed Development. A Scoping Report was issued to Galway County Council in May 2026 but unfortunately no response was received in relation to same.

2.5 COMMUNITY BENEFIT FUND

The proposed project has the potential to bring significant positive benefit to the local community. The project will contribute annual rates to the local authority, and it will provide opportunity for local community investment in the project in line with the Renewable Energy Support Scheme (RESS) estimated at over €4 million over the first 15 years of the project.

A significant annual community benefit fund estimated at approximately €300,000 per year for the first 15 years of the project will be established in line with Government policy which will include funding for both wider community initiatives and a Near Neighbour scheme focused on houses in close proximity to the project.

The first task will be to form a benefit fund development working group that clearly represents both the closest neighbours to the project as well as nearby communities. This group will then work on designing the governance and structure of a community entity that will administer the

Community Benefit Fund. The fund will be operated in accordance with the Government of Ireland's Good Practice Principles Handbook for Community Benefit Funds, which will mean that the Fund will deliver initiatives that are in alignment with the UN Sustainable Development Goals.

Please refer to Section 2.5 of Chapter 2 of the EIAR submitted with this planning application for further detail.

C

2.6 PLANNING LEGISLATION

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

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

The proposed wind farm will consist of thirteen (13) turbines and have an output of above 50 Megawatts and as such constitutes SID under the meaning of the legislation. Consultations were held with An Coimisiún Pleanála under Section 37B of the Planning and Development Act 2000 (as amended). ACP has confirmed that the Proposed Development falls within the scope of paragraphs 37A(2)(a), (b) and (c) of the Act. Accordingly, it has been confirmed that the proposed wind farm would be strategic infrastructure within the meaning of Section 37A of the Planning and Development Act, 2000 (as amended), and that any application for permission must therefore be made directly to ACP.

2.6.1 Planning and Development Act 2024

Schedule 1 of the Planning and Development Act 2024 sets out classes of development that constitute Strategic Infrastructure Development (SID). Under Schedule 1, Part 1 (Energy Infrastructure), Class 1(h) includes:

> *"an installation for the harnessing of wind power for energy production with not less than 25 turbines or having a total output not less than 50 megawatts."*

The proposed wind farm will comprise thirteen (13) wind turbines and will have a total output of greater than 50 megawatts. Accordingly, the proposed development constitutes Strategic Infrastructure Development within the meaning of Schedule 1 of the Planning and Development Act 2024.

Pre-application consultations were undertaken with An Coimisiún Pleanála in accordance with the provisions of the Planning and Development Act 2000 relating to Strategic Infrastructure Development. The transitional arrangements under the 2024 Act provide that Section 37B Pre-Application Consultation meetings which are closed but not lodged before the full implementation of the Planning and Development Act 2024 are to be submitted under the provisions of Chapter 4 of the 2024 Act itself. Following these consultations, An Coimisiún

Pleanála confirmed that the proposed development constitutes Strategic Infrastructure Development for the purposes of the Act. Accordingly, any application for permission in respect of the proposed wind farm must be made directly to An Coimisiún Pleanála.

2.7 ENVIRONMENTAL CONSTRAINTS

There are several planning considerations created by environmental constraints and in particular, impact on Natura 2000 sites, landscape and visual impact, cumulative and local amenity through visual, noise, construction traffic and shadow flicker.

An initial constraints map of the proposed wind farm development site is provided in Figure 2-4 below. A number of initial constraints have been identified in the environs of the project site:

- SAC – There are a number of Special Areas of Conservation (SAC) adjacent to and in the immediate surroundings of the site, namely, Cloughmoyne SAC and Lough Corrib SAC. There are two proposed Natural Heritage Areas (pNHA) within 1 km of the site boundary, namely Cloughmoyne pNHA and Rostaff Turlough pNHA.
- Cultural Heritage – Figure 2-4 indicates 6 SMRs (Sites and Monuments Record) located within the proposed wind farm site, with others dotted along the boundary of the site and in the immediate vicinity.
- Telecommunications – There are 4 known telecommunication routes running across the wind farm site, namely, Cloghanower, Carrowoughteragh, Three and Vodafone.
- Water – there are no notable constraints hydrologically on the proposed wind farm site. There is a field drain leading to a swallow hole which should be avoided.

These environmental constraints were discussed extensively in the three Pre-Application Consultation meetings with An Coimisiún Pleanála. The feedback received from ACP has been incorporated into the overall design of the Proposed Development, and comprehensive analysis of these environmental constraints has been discussed in detail in the following documentation which accompanies this planning application:

- **SAC:** Appropriate Assessment Screening Report (AASR), Natura Impact Statement (NIS) and Chapter 6 of the EIAR accompanying this application (Biodiversity), including associated appendices
- **Cultural Heritage:** There are six recorded monuments within the proposed wind farm site as indicated in Figure 2-4 below. These comprise, from east to west; hillfort AH98, hut site AH98, field system AH79, burnt mound AH99, burnt mound AH100, ringfort-cashel AH78, enclosure AH97, and redundant record AH96. In addition, the proposed GCR will travel within the zone of notification of AH85 (Ringfort-rath MA122A010), AH123 (Earthwork GA042-160), and AH128 (comprising eight recorded monuments, GA042-001001 to GA042-001010). The only significant residual effect of both the GCR and Wind Farm will be on Hillfort AH98 given its proximity to T13. There will be no other significant residual effects on the archaeological, architectural and cultural heritage receptors following the

completion of all construction mitigation measures. Please refer to Chapter 13 and associated appendices of the EIAR which accompanies this planning application for further detail.

- Telecommunications: As outlined in Chapter 11 of the EIAR included with this planning application (Material Assets), a comprehensive list of telecommunication operators were consulted to identify any potential effects to existing telecommunication links both on the wind farm site and in the area generally. Following receipt of the telecommunications consultation responses, the information provided by telecommunications operators was incorporated into the design and assessment process for the proposed project. Information relating to telecommunications infrastructure, including microwave radio links, telecommunications mast sites and Terrestrial Trunked Radio (TETRA) Ireland network infrastructure, was reviewed as part of the project design process. Please refer to Section 11.4.2 of Chapter 11 of the enclosed EIAR for further detail.
- Water: The construction of the proposed project could result in contamination of groundwater via infiltration to ground, or contamination of surface water via contaminated runoff or spills into the adjacent drainage channels. However, the area which could be potentially impacted by the proposed project will be localised and with the implementation of the mitigation measures during the construction, operational and decommissioning phases, any effects on the water environment will be not significant. The operational phase of the proposed project will have a not significant adverse long-term effect on the hydrology and hydrogeology environment through the application of identified mitigation measures and appropriate management throughout the operation phase of the proposed wind farm site. Please refer to Chapter 9 (Hydrology and Hydrogeology) of the EIAR accompanying this planning application, including the Water Framework Directive Assessment and Flood Risk Assessment which are both appendices to this EIAR chapter.

Figure 2-4 and 2-5 below provides an overview of sensitive receptors adjoining the proposed site. There are over 180 no. individual one-off rural properties (mostly houses) within 1km of the proposed wind farm site, but these are all located at least 600m from nearest proposed wind turbine. This has been considered through the pre-planning design stage and design evolution of the Proposed Development. There is a total of 253 no. sensitive receptors within 2km of the Proposed Development site.

The overall design of the Proposed Development has been progressed so that impact on constraints is avoided, or if avoidance if not possible then mitigated, such that the potential for significant environmental effects do not occur. These constraints and others are assessed in full in the EIAR accompanying this planning application.

In addition, please refer to Chapter 3 of the enclosed EIAR (Consideration of Reasonable Alternatives) which outlines the design evolution of the Proposed Development, and by doing so, highlights how the finalized design has been prepared in light of the abovementioned environmental constraints.

Figure 2-3 - Environmental Constraints Map

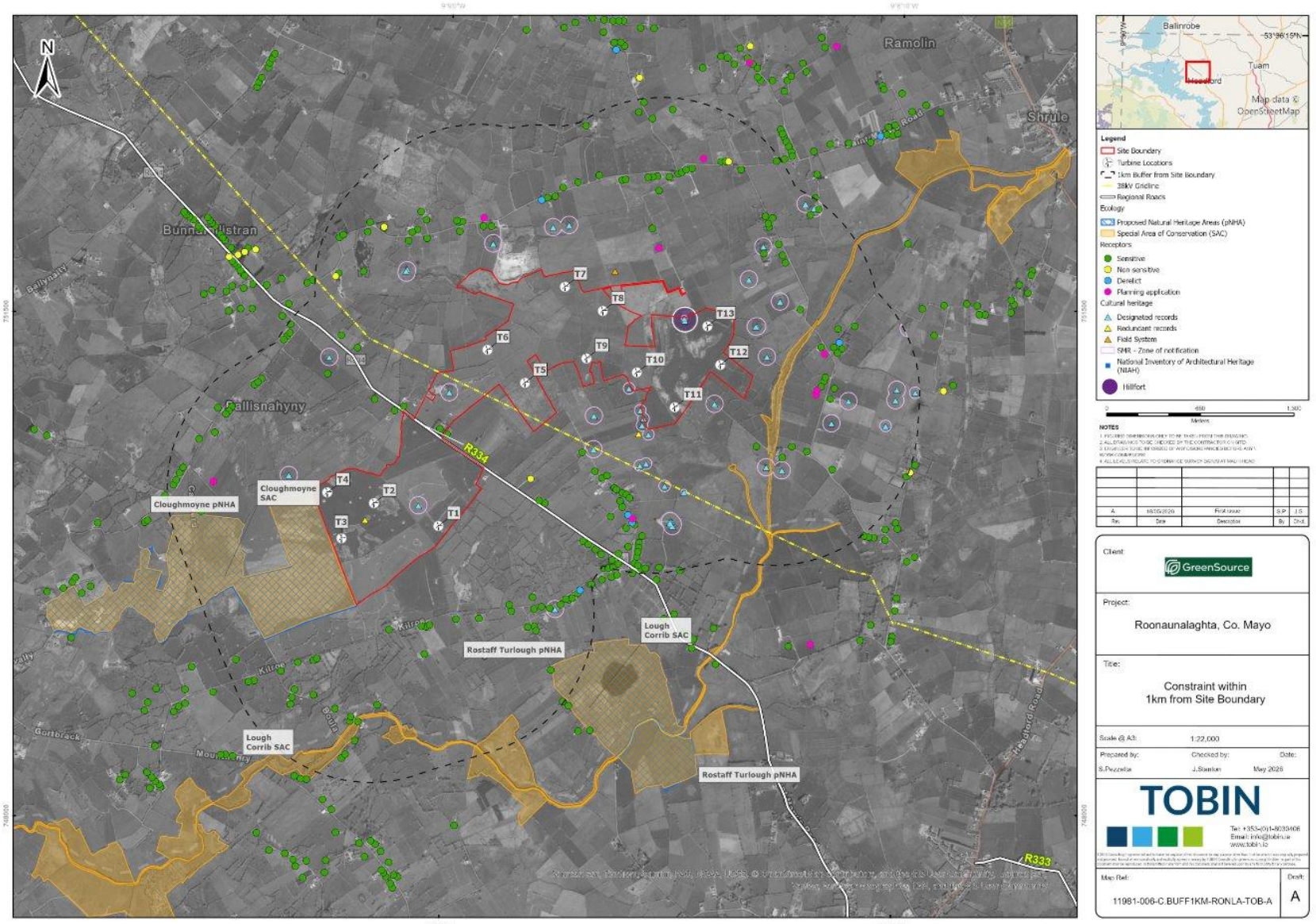
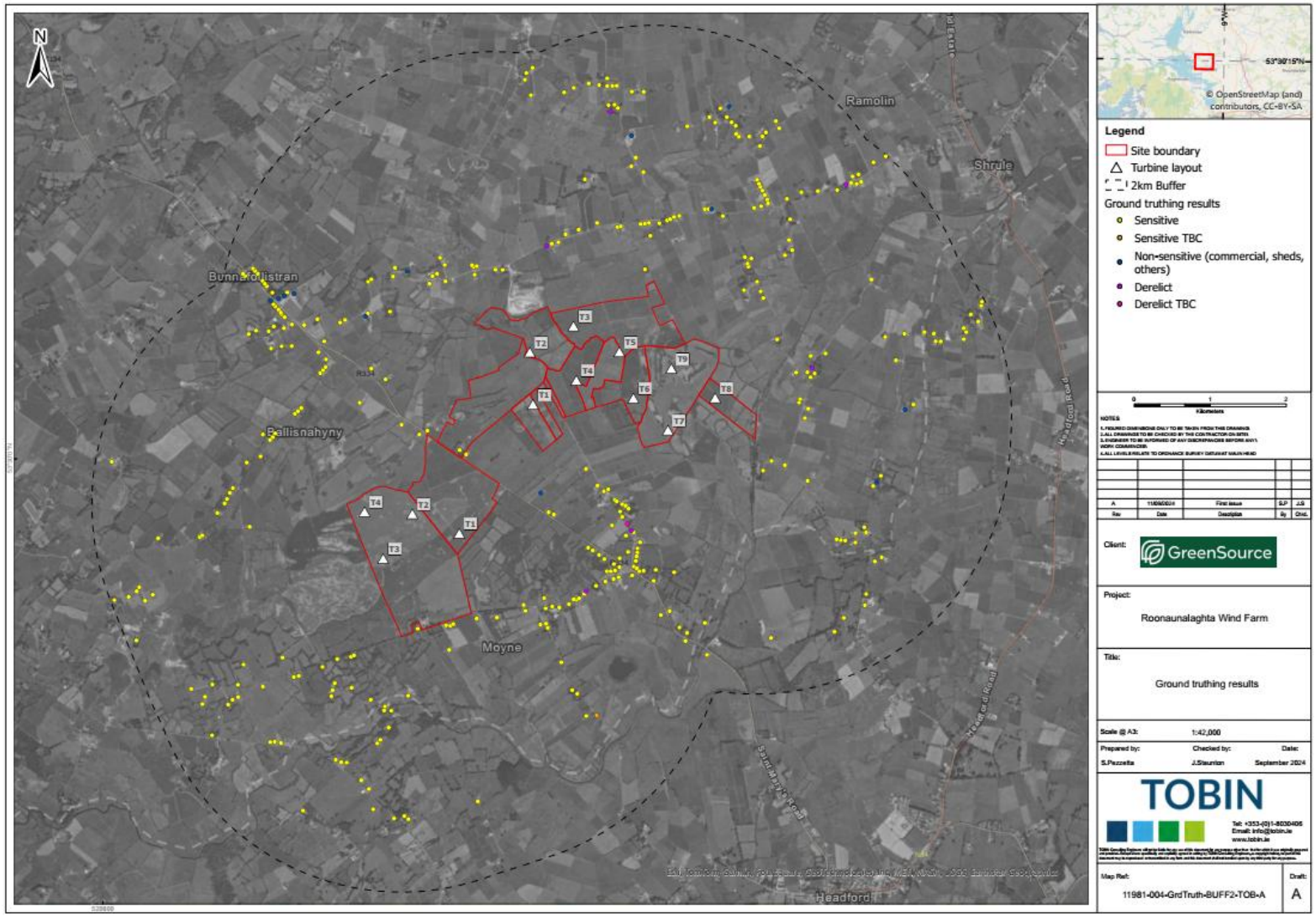


Figure 2-4 - Sensitive Receptors within 2 km from Site



3. PLANNING AND DEVELOPMENT LEGAL AND POLICY CONTEXT

When assessing a project of this scale, it is pertinent to place the Proposed Development within an international, EU, national, regional and local policy context. This section provides a summary of this context, as well as a summary of the legislative mechanisms which support the generation of energy from renewable sources, reduce fossil fuel dependency and support national energy security.

3.1 INTERNATIONAL AND EUROPEAN POLICY CONTEXT

3.1.1 The European Green Deal 2019

The European Green Deal 2019 illustrates the commitment by The European Commission on an international level to tackling climate and environmental-related challenges. The aims of the European Green Deal (EGD) are as follows and shows a sense of urgency around these environmental issues.

First climate action initiatives under the EGD include:

- European Climate Law to enshrine the 2050 climate-neutrality objective into EU law;
- European Climate Pact to engage citizens and all parts of society in climate action.

The European Commission adopted "Fit for 55", a set of policy proposals preparing the implementation of the EGD. In particular, "Fit for 55" aims to reduce greenhouse gas emissions (GHG) by at least 55 percent by 2030. The European Climate Pact aims to engage citizens and all parts of society in climate action. This initiative shows a strong commitment from Europe to move towards and encourage more sustainable sources of energy.

In December 2018, the Renewable Energy Directive (RED) established a new target of producing at least 32 percent of all energy from renewable sources by 2030. This was a revision from the previous target of 20 percent by 2020, which was achieved in 2019. Fit for 55 proposes to increase the RED's renewables target to 40 percent by 2030. The European Commission states that energy production accounts for 75 percent of EU emissions output. Increasing the renewable energy production target can enable the reduction of EU GHG emissions and achieve the Fit for 55 objectives.

The European Commission proposed in its "Fit for 55" package an increase from the preliminary 32 percent share of renewables to 40 percent. This furthermore showcases the importance of the climate crisis and need to tackle issues in the energy sector. "Fit for 55" contains 13 proposals overall, some existing and some new.

More recently in 2023, the RED was further amended to set a current binding renewable energy target of at least 42.5% at EU level, but aiming for 45%, emphasising a growing obligation to renewable energy sources.

This amended target will have a direct positive impact on the application for the proposed project and demonstrate commitments by Ireland to increase sources of renewable energy in a bid to tackle the climate crisis.

Figure 3-1 - European Green Deal Objectives



A REPowerEU Plan was published by the European Commission in 2022 with the purpose of saving energy, producing clean energy and diversifying the supply of energy. The plan was produced in response to the Ukraine war to reduce Europe's dependence on Russian fossil fuels. The Plan contains strategies and measures to phase out the EU's dependency on Russian fossil fuels by the end of the decade by building on the implementation of the European Green Deal and the EU's "Fit for 55" proposals (seeking to cut emissions by at least 55% by 2030). The Plan focuses on diversifying energy sources, accelerating a transition from fossil fuels to clean energy, saving energy, smart investment and reinforcing preparedness.

In support of this plan, Council Regulation (EU) 2022/2577 was adopted on the 22nd of December 2022 to provide a framework to accelerate the deployment of renewable energy.

This regulation has been adopted as a temporary measure for the “fast deployment of renewable energy sources” to “help mitigate the effects of the current energy crises”.

Although this Regulation has now expired, one significant measure introduced by the Regulation itself was the *“introduction of a rebuttable presumption that renewable energy projects are of overriding public interest and serving public health and safety for the purposes of the relevant Union environmental legislation, except where there is clear evidence that those projects have major adverse effects on the environment which cannot be mitigated or compensated for”*.

More recently, in accordance with the Green Deal and REPowerEU initiatives, the European Parliament decided to increase the deployment of renewable energy in October 2023 in the form of an update to the RED. REDIII carries over the "*rebuttable presumption that renewable*

energy projects are of overriding public interest and serving public health and safety when balancing legal interests in individual cases for the purposes"

The legislation will expedite the permitting process for new or modified renewable energy installations, such as wind turbines and solar panels. If a new renewable energy plant is situated in a "renewables go-to area," national authorities should approve it in no more than a year. Outside of these designated areas, the procedure should not exceed 24 months.

3.2 National Policy Context

3.2.1 National Climate Action Legislation

The relevant EU and international policy and legislation outlined above are transposed into the Irish context through the introduction of the Climate Action and Low Carbon Development Act 2015 (as amended). This Act guides the preparation of Ireland's long term climate action strategies, climate action plans, national climate change adaptation frameworks and carbon budgets which all act as overarching national climate action policies and targets within the State.

3.2.1.1 Climate Action and Low Carbon Development Act 2015

This Act provided the statutory basis for the national transition objective set in the national policy position. It committed Ireland to being a low carbon economy by 2050 and to also match Ireland's targets with those of the EU. It required that the Minister for Communications, Climate Action, and the Environment make and submit to Government a series of successive National Mitigation Plans and National Adaptation Frameworks. While there were no explicit targets set out within the Act itself, the legislation obliged the State to consider any existing obligations of the State under the law of the European Union or any international agreement. In effect the Act formally obliges the State to adhere to EU targets.

3.2.1.2 Climate Action and Low Carbon Development (Amendment) Act, 2021

The purpose of the Climate Action and Low Carbon Development (Amendment) Act, 2021 is to provide for the approval of plans '*for the purpose of pursuing the transition to a climate resilient and climate neutral economy by the end of the year 2050*'. The 2021 Climate Act also '*provides for carbon budgets and a decarbonisation target range for certain sectors of the economy*'. The 2021 Climate Act removes any reference to a national mitigation plan and instead refers to both the Climate Action Plan, and a series of National Long Term Climate Action Strategies.

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

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

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

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

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

3.2.2 Climate Action Plan 2025 (CAP25)

The Climate Action Plan 2025 (CAP25) represents the fourth update to Ireland's Climate Action Plan and builds on the cumulative progress achieved since the release of previous Climate Action Plans. CAP25 further refines and strengthens the measures and actions necessary to remain on track to deliver Ireland's legally binding carbon budgets and sectoral emissions ceilings. It reinforces the national commitment to reduce greenhouse gas emissions by 51% by 2030 and to achieve climate neutrality by no later than 2050, in accordance with the Climate Action and Low Carbon Development (Amendment) Act 2021. The Plan continues to provide a clear and coordinated roadmap for implementing Ireland's climate ambition, aligned with the economy-wide carbon budgets and sectoral ceilings agreed by Government.

High impact sectors remain central to CAP25, with renewables continuing to play a critical role in decarbonising the power system and enabling the wider electrification of heat, transport, and industry. CAP25 places a strong emphasis on accelerating renewable electricity deployment, particularly onshore wind, as a key enabler of emissions reduction across multiple sectors. The Plan maintains a strong focus on increasing renewable generation capacity to meet electricity demand while supporting energy security and economic resilience.

CAP25 recognises that the transition to a climate neutral economy will have differing impacts across sectors, regions, and communities. In response, the Plan embeds Just Transition principles throughout its actions, ensuring that climate policies are designed and implemented Climate Action Plans.

Progress in renewable electricity generation and emissions reduction within the power sector is acknowledged, reflecting continued increases in renewable penetration and reductions in reliance on fossil fuels. However, CAP25 recognises that a significant acceleration in implementation is required during the remainder of the decade to meet 2030 targets and to place Ireland on a credible pathway to a fully decarbonised economy by 2050. To this end, CAP25 identifies enhanced delivery, system flexibility, grid development, and planning reform as critical enabling factors, supported by clear performance metrics and ongoing monitoring.

Figure 3-2 - CAP25 National Renewable Energy Targets

National Target	2025	2030
Renewable Electricity Share	50%	80%
Onshore Wind	6 GW	9 GW
Solar	Up to 5 GW	8 GW
Offshore Wind	-	At least 5 GW
New Flexible Gas Plant	-	At least 2 GW
Demand Side Flexibility	15-20%	20-30%

3.2.3 Ireland 2040 - Our Plan: National Planning Framework, (First Revision – April 2025)

Ireland 2040 - National Planning Framework, hereafter referred to as the NPF, published by the Government in February 2018, is a 20-year planning framework. The First Revision of the National Planning Framework (NPF), issued in April 2025, updates existing policies and objectives to ensure continued alignment with national targets and evolving EU-level directives.

The NPF covers a wide range of national policy objectives and National Strategic Outcomes (NSO). However, those most relevant in the overall context of wind energy development are as follows:

Table 3-1 - National Strategic Outcomes (NSO) and National Policy Objectives (NPO)

National Policy Objective (NPO)	Description
NSO 8	The key outcome provided for under NSO 8 is '*the transition our society to a low carbon and more climate resilient society*'. The NSO states that '*new energy systems and transmission grids will be necessary for a more distributed, more renewables focused energy generation system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy. State-owned commercial enterprises are significant players in the energy market, which is subject to EU regulatory framework.*". The NSO goes on to state that '*diversification of our energy production systems away from fossil fuels and towards green energy such as wind, wave, solar and biomass, together with smart energy systems and the conversion of the built environment into both generator/consumer of energy and the electrification of transport fleets will require the progressive and strategic development of a different form of energy grid*'.
NPO 69	*Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.*
NPO 70	*Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050.*
NPO 71	*Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development.*
NPO 72	*Support an all-island approach to the delivery of renewable electricity through interconnection of the transmission grid.*

NPO 73	*Support the co-location of renewable technologies with other supporting technologies and complementary land uses, including agriculture, amenity, forestry and opportunities to enhance biodiversity and promote heritage assets, at appropriate locations which are determined based upon the best available scientific evidence in line with EU and national legislative frameworks.*

The revised First Revision of the NPF amends the previous National Strategic Outcome 8 to reflect updated legally binding renewable energy and greenhouse gas emissions targets set out under CAP 24.

In summary the key steps indicated for delivering on a low carbon society are as follows:

- Transition to a low carbon and climate resilient society (NSO 8)
- Reduce Ireland's carbon footprint by integrating climate action into the planning system in support of national climate mitigation and adaptation objectives, and greenhouse gas emissions reduction targets as expressed in the most recently adopted carbon budgets (NPO 69).
- Promote renewable energy use and generation at appropriate locations within the built and natural environment to support the achievement of a climate-neutral economy by 2050 (NPO 70).
- Strengthen and enhance the national electricity grid and transmission network to accommodate increased renewable energy generation and meet growing demand associated with population and economic growth (NPO 71).

Additionally, NPO 74 of the First Revision of the NPF sets out revised Regional Renewable Electricity Capacity Allocations as set out in Figure 3-3 below. The proposed project site is situated in the Northern and Western region, of which 1,389 MW has been identified as an additional renewable power capacity allocation, which in the year 2030, would amount to 35% of the total national share.

Figure 3-3 - Regional Renewable Energy Capacity Allocations set out under the Revised NPF (First Revision – April 2025)

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

3.2.4 National Development Plan 2021-2030

The National Development Plan 2021-2030 (NDP) sets out the investment priorities at national, regional, and local planning levels that will facilitate the implementation of the NPF.

Extensive efforts have been made to ensure that the NDP will support the Government's climate ambitions that are set out in the NPF. Climate and environmental assessment of the NDP measures has been undertaken, along with an assessment of the alignment of the plan with the ideals of a green recovery plan. It states that investment in renewable energy sources, ongoing capacity renewal, and future technology affords Ireland the opportunity to comprehensively decarbonise our energy generation. Renewable energy, including wind technology, will play a key role in helping to diversify away from a reliance on fossil fuels and reaching our NSO and NPO'S outlined above.

3.2.5 Wind Energy Development Guidelines 2006

The Wind Energy Development Guidelines (WEDG) offer advice to planning authorities for wind energy applications through the development plan process, they are also intended to ensure that there is consistency in identifying suitable locations.

The guidelines provide statutory guidance for wind energy development, focusing on environmental issues, such as:

- Noise and shadow flicker
- Design
- Siting,
- Spatial extent and scale
- Cumulative effect and spacing
- Layout and height

The WEDG indicate that there is need for a plan-led approach for the development of wind energy moving forward.

A review of the 2006 guidelines was undertaken in 2019 that addressed a number of key aspects including:

- Noise
- Visual amenity setback
- Shadow flicker
- Consultation obligations
- Community dividend
- Grid connections

However, the 2006 guidelines remain the statutory policy guide in relation to all wind energy developments.

3.2.6 Draft Revised Wind Energy Development Guidelines – December 2019

The WEDG 2006 were reviewed. Following consultation, a preferred draft approach was announced in 2017. Following on from initial public consultation in December 2013, the Draft Revised Wind Energy Development Guidelines were released in December 2019 which included new standards in the following areas:

- New Noise Standards;
- Setback distances;
- Automatic shadow flicker control mechanisms;
- Community consultation;
- Community dividend;
- Grid connections.

These revised guidelines are still under review and until such time as the new guidelines are published, the 2006 guidelines remain the statutory policy guide in relation to all wind energy developments. As demonstrated in the EIAR, the Rooaunalaghta Green Energy Project will not result in any likely significant effects on the environment and has been assessed with reference to the draft guidelines insofar as possible, noting that these guidelines remain in draft format. While the overall design of the proposed development has had reference to the draft guidelines, it is considered that the development itself has been designed in accordance with all relevant statutory and best practice requirements.

3.3 Regional Policy Context

The Northern and Western Regional Assembly published a Regional Spatial and Economic Strategy (RSES) for the Northern and Western Regional 2020-2032, which came into effect in June 2020. The primary statutory purpose of the RSES is to provide a long-term spatial and economic development framework for the Region, while supporting delivery of the National Planning Framework (NPF) and the National Development Plan (NDP). Policies in the RSES which are directly relevant to the proposed Wind Farm are discussed in detail below.

3.3.1 Climate Action and Low-Carbon Transition

The RSES recognises the urgent need to address climate change and to support Ireland's transition to a climate-resilient, low-carbon and environmentally sustainable economy. It promotes the decarbonisation of energy generation, increased deployment of renewable energy, and improved energy efficiency across all sectors.

The RSES identifies the Northern and Western Region as having significant potential to contribute to national renewable electricity generation, particularly through onshore wind energy, due to its strong wind regime and lower population density.

3.3.2 Energy Efficiency and Sustainable Buildings

The RSES also promotes improved energy efficiency and reduced energy demand, particularly in the built environment, recognising this as a key measure in achieving climate and energy objectives. It supports high standards of building design, compact growth and the integration of low-carbon and renewable energy technologies in order to minimise energy consumption. Improved energy efficiency is viewed as complementary to the increased deployment of renewable electricity generation and the transition to a low-carbon energy system.

3.3.3 Strategic Energy and Electricity Grid Infrastructure

Section 8.6 of the RSES recognises that the electricity transmission and distribution network is a critical piece of national and regional infrastructure. Upgrading and expanding the grid is essential to:

- Accommodate increasing levels of renewable electricity generation, particularly from wind;
- Ensure a secure, reliable and high quality electricity supply;
- Support regional economic development, including energy intensive and high technology industries.

The RSES states that the strengthening of the electricity grid will enable the Region to safely export surplus renewable electricity while also meeting future increases in electricity demand driven by electrification of heat and transport.

Table 3-2 - Northern and Western RSES Regional Policy Objectives

Regional Policy Objective (RPO)	Description
RPO 4.16	*The NWRA shall co-ordinate the identification of potential renewable energy sites of scale in collaboration with Local Authorities and other stakeholders within 3 years of the adoption of the RSES. The identification of such sites (which may extend to include energy storage solutions) will be based on numerous site selection criteria including environmental matters, and potential grid connections.*
RPO 4.17	*To position the region to avail of the emerging global market in renewable energy by:* - *Stimulating the development and deployment of the most advantageous renewable energy systems* - *Supporting research and innovation* - *Encouraging skills development and transferability* - *Raising awareness and public understanding of renewable energy and encourage market opportunities for the renewable energy industry to promote the development and growth of renewable energy businesses* - *Encourage the development of the transmission and distribution grids to facilitate the development of renewable energy projects and the effective utilisation of the energy generated from renewable sources having regard to the future potential of the region over the lifetime of the Strategy and beyond.*

RP0 4.18	*Support the development of secure, reliable and safe supplies of renewable energy, to maximise their value, maintain the inward investment, support indigenous industry and create jobs.*
RPO 8.1	*The Assembly support the development of a safe, secure and reliable electricity network and the transition towards a low carbon economy centred on energy efficiency and the growth projects outlined and described in this strategy.*
RPO 8.2	*Support the reinforcement and strengthening of the electricity transmission network with particular reference to the regionally important projects contained within Table 11.*
RPO 8.3	*The Assembly support the necessary integration of the transmission network requirements to allow linkages with renewable energy proposals at all levels to the electricity transmission grid in a sustainable and timely manner.*
RPO 8.4	*That reinforcements and new electricity transmission infrastructure are put in place and their provision is supported, to ensure the energy needs of future population and economic expansion within designated growth areas and across the region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs. Ensure that development minimises impacts on designated areas.*

Overall, the Northern and Western RSES explicitly supports the development of wind energy and associated grid infrastructure in suitable locations and recognises the Region's strategic role in achieving national renewable energy and climate targets.

3.4 Local Policy Context

The Proposed Development lies within the functional area of both Mayo County Council and Galway County Council. The Proposed Development is thus informed by the provisions of the Mayo County Development Plan 2022-2028 and the Galway County Development Plan 2022 – 2028. This section sets out the relevant objectives, policies, and provisions for the Proposed Development at a local level.

3.4.1 Mayo County Development Plan 2022-2028

The Mayo County Development Plan 2022-2028, (hereafter referred to as the "Mayo CDP") was adopted by Mayo County Council on the 29th June 2022 and came into effect on the 10th August 2022. The Plan establishes policies and objectives for the proper planning and sustainable development of County Mayo and is aligned with the NWRA RSES, to give effect

to National Strategic Outcomes and the National Climate Action Plan. Chapter 11 of the Plan provides Climate Action & Renewable Energy policy with the stated strategic aim:

> *"to 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; in addition to maximising the opportunities to become a national leader in renewable energy generation, whilst increasing the resilience of our Natural and Cultural Capital to climate change by planning and implementing appropriate adaptation measures"*

The Mayo CDP sets a minimum target of 600MW of renewable energy to be delivered across Mayo County over the Plan period. The Plan considers this target to be achievable, but it is worth noting that the Mayo CDP will be required to be updated and revised over the lifetime of the Plan to ensure alignment with the Northern and Western Regional Assembly's forthcoming Renewable Energy Strategy.

The Mayo CDP further recognises the importance of onshore wind energy as a renewable energy source with the Plan stating that it will "endeavour to continue to facilitate wind energy projects that accord with the Mayo RES [Renewable Energy Strategy], the Landscape Appraisal of County Mayo and the relevant Section 28 ministerial guidelines.

The following renewable energy policies and objectives are provided under the Plan in support of the Proposed Development:

- **REP-1:** To support Ireland's renewable energy commitments outlined in national policy by facilitating the development and exploitation of a range of renewable energy sources at suitable locations within the county, where such development does not have a negative impact on the surrounding environment (including water quality), landscape, biodiversity or local amenities to ensure the long-term sustainable growth of the county.
- **REP-3:** To actively encourage and support the sustainable development, renewal and maintenance of energy generation infrastructure in order to maintain a secure energy supply, while protecting the landscape, archaeological and built heritage and having regard to the provisions of the Habitats Directive.
- **REP-4:** To ensure that developers of proposed large-scale renewable energy projects carry out community consultation in accordance with best practice and commence the consultation at the initiation of project planning.
- **REP-5:** To promote the use of efficient energy storage systems and infrastructure that supports energy efficiency and renewable energy system optimization, subject to the proper planning and sustainable development of the area and consideration of environmental and ecological sensitivities.
- **REP-7:** To promote the harnessing of wind energy to contribute toward decarbonising County Mayo, including new emerging by-product markets.
- **REO-1:** To co-operate with the Northern and Western Regional Assembly in identifying
- Strategic Energy Zones as areas suitable for larger, energy generating projects, community and micro energy production, whilst ensuring environmental constraints and a regional landscape strategy are considered.
- **RE0-3:** To encourage and facilitate, where possible, the production of energy from established and emerging renewable technologies.

- **REO-6:** To ensure all renewable energy proposal comply with the provisions of the Mayo County Council Renewable Energy Strategy 2011-2022 (or as updated).
- **REO-8:** To encourage the development of wind energy, in accordance with Government policy, and having regard to the Landscape Appraisal of County Mayo and the Wind Energy Development Guidelines (2006) and Mayo Renewable Energy Strategy, or any revisions there of or future guidelines, and ensure consistency with the provisions of RPO 4.16 and RPO 5.2(b) of the RSES (2020-2032).

The Mayo County Development Plan was varied through the adoption of Variation No. 1 which was enacted on 8th December 2025. The purpose of this Variation related to alignment with NPF Implementation and associated housing growth requirements, as well as alignment with Section 28 Guidelines on NPF Implementation (published by Department of Housing, Local Government and Heritage in July 2025). Given that this Variation relates to implementation of land use zoning maps for Castlebar Town, Ballina and Westport, an update to Table 2.4 (Core Strategy) and Strategic Residential Reserve Tier 1 Lands, it is considered that this Variation does not have relevance to the Proposed Development.

More recently, the Mayo County Development Plan was subsequently updated by Variation No. 2 which was adopted on 13th July 2026. This Variation comprises an updated Renewable Energy Strategy for County Mayo. However, as noted above, this Variation is considered to be premature as the Mayo CDP must be updated to ensure alignment with the Northern and Western Regional Assembly's forthcoming Renewable Energy Strategy.

3.4.2 Comparison of Renewable Energy Strategy for County Mayo 2011-2020 and Newly Adopted Renewable Energy Strategy for County Mayo

The Renewable Energy Strategy for County Mayo 2011 – 2020 was prepared in the context of EU and national renewable energy targets. The Strategy is underpinned by Strategic Environmental Assessment (SEA) and Habitats Directive Assessment (HDA). The SEA has evaluated five potential strategy options and their effects on the environment and designated sites, including Natura 2000 sites. The HDA assessed the effect the Strategy would have on the conservation objectives of any Natura sites in the County and within 15km of the County boundary. According to the Strategy Mayo has been identified as having one of the best wind regimes in Europe 17, and notes that,

> *"in order to achieve the national renewable energy targets and the objectives of the Strategy, improvements and the provision of new infrastructure to the electricity transmission network in Mayo is considered imperative for all renewable energy technologies."*

Under the 2011 – 2022 strategy, the project site is identified as being largely located within a '*Tier 2 (Open for consideration)*' location. Open for consideration identifies areas which may be considered for wind farms or small clusters of wind turbines but where the visual impact on sensitive or vulnerable landscapes, listed highly scenic routes, scenic routes, scenic viewing points and scenic routes will be the principal consideration.

Variation No.2 of the Mayo County Development Plan 2022 – 2028

Variation No. 2 of the Mayo County Development Plan 2022–2028 was adopted by Elected Members on 13th July 2026 and introduces an updated Renewable Energy Strategy (RES) for

the County, which proposes a series of amendments to the existing Renewable Energy Strategy (RES).

A notable and material change within this updated strategy is the re-designation of extensive areas of land from “Open for Consideration” to “Unsuitable” for wind energy development. This reclassification has significant implications for the spatial distribution of renewable energy opportunities within the County.

3.4.2.1 Public Consultation of Variation No. 2

The public consultation period for Variation No. 2 of the Mayo County Development Plan 2022–2028 ran from 28th April 2026 to Tuesday 26th May 2026, during which a total of 46 submissions were received.

Greensource Submission

Greensource Sustainable Developments Ltd put forward a submission on the Draft Mayo Renewable Energy Strategy, whereby they raised concerns that the Draft RES is overly restrictive, premature, and inconsistent with Ireland's climate and renewable energy obligations.

The submission contends that Mayo's draft methodology unnecessarily excludes large areas of the county from wind development through the use of an outdated 2002 Landscape Appraisal, blanket peatland exclusions, restrictions on upland areas above 500m, extensive settlement constraints, and zoning that removes many of the county's highest wind resource areas from consideration. As such, the submission claims these measures conflict with national policy, the Climate Action Act, the Revised National Planning Framework (NPF), and recent climate-related case law.

A substantial portion of the submission critiques the methodology underpinning the Wind Strategy Map. Greensource argues that landscape sensitivity is given excessive weight, resulting in approximately 57% of Mayo being deemed unsuitable for wind development. It challenges the treatment of peatlands as an absolute constraint, noting that many existing Mayo wind farms are located on peat soils and that wind projects can facilitate peatland restoration. The submission also highlights what it sees as contradictions within the strategy, particularly that the highest wind resource areas in western Mayo are classified as unsuitable, while lower-wind eastern areas are identified as "Open for Consideration."

The submission concludes by requesting that Mayo County Council pause the RES process until the Northern and Western Regional Assembly (NWRA) completes its revised Regional Spatial and Economic Strategy (RSES) and Renewable Energy Strategy.

Inis Onshore Wind Submission

Inis Onshore Wind, in partnership with Greensource Sustainable Developments Ltd, made a submission on the Draft Mayo Renewable Energy Strategy (RES), arguing that the strategy is overly restrictive, premature and risks undermining the delivery of national renewable energy and climate targets. The submission contends that the Draft RES significantly reduces the amount of land available for wind energy development by rezoning a number of existing and emerging wind energy projects from favourable designations to "Unsuitable" designations or similar.

A key element of this submission is the argument that the Draft RES was prepared prematurely in advance of the forthcoming Northern and Western Regional Assembly (NWRA) Regional Spatial and Economic Strategy (RSES), which will allocate renewable electricity capacity targets and establish a coordinated regional approach to renewable energy and landscape planning. Following on from this, the Inis Onshore submission states that the Mayo RES may require substantial revision once the regional strategy is finalised.

The submission is critical of the methodology used to identify suitable wind energy lands, particularly the application of blanket constraints relating to peat soils and landscape sensitivity. It argues that peatlands should be assessed on a site-specific basis through planning and environmental assessment processes rather than being excluded at a strategic level. The submission also notes that wind energy developments can facilitate peatland restoration and biodiversity enhancement measures.

The submission further contends that the landscape assessment underpinning the Draft RES places excessive weight on landscape sensitivity and relies heavily on the existing Mayo Landscape Appraisal. It argues that this approach does not adequately reflect landscape capacity to accommodate renewable energy development and thus is unlikely to align with emerging regional and national policy frameworks.

In addition, the submission questions the viability of many areas designated as "Open for Consideration", noting that these lands are generally located in eastern Mayo where wind speeds are lower and residential and archaeological constraints are more prevalent. By doing so, it highlights that some of Mayo's strongest wind resource areas have been designated as unsuitable for development.

The submission concludes that the Draft RES should be reviewed and amended to ensure that County Mayo can support the delivery of national renewable energy, climate action and energy security objectives, while also being realigned with the forthcoming NWRA RSES.

Wind Energy Ireland Submission

The submission by Wind Energy Ireland (WEI) is also significant as it raises substantive concerns regarding the practical effectiveness and deliverability of the Draft RES. While acknowledging that the strategy results in a modest increase in lands identified as "Open for Consideration", WEI argues that the methodology has produced a spatial framework that remains highly restrictive in practice. In particular, WEI's analysis found that approximately 95% of the lands identified as "Open for Consideration" are located within 500m of a residential Eircode, thereby substantially limiting the availability of developable land when residential amenity considerations and potential turbine setback requirements are taken into account.

WEI further contends that the practical viability of many of the lands identified as suitable for future wind energy development is constrained by a combination of residential proximity, archaeological sensitivities, environmental constraints and, in some locations, marginal wind resource. As a consequence, WEI argues that the apparent increase in lands available for wind energy development may not translate into a meaningful increase in realistically developable areas. In this regard, the submission questions whether the Draft RES provides a sufficiently robust and evidence-based framework to realise Mayo's long-term renewable energy potential and future regional renewable energy allocations

Office of Planning Regulator Submission

The Office of the Planning Regulator (OPR) also made a submission in relation to the Draft RES, broadly supporting Mayo County Council's objective of preparing an updated Renewable Energy Strategy but identifying significant shortcomings in both the methodology and supporting evidence base underpinning the proposed approach. In particular, the OPR concluded that these shortcomings weakened the robustness of the strategy and expressly highlighted the application of the 1km settlement buffer as being inconsistent with national policy relating to renewable onshore wind development. The OPR further noted that the settlement buffer had significantly influenced the identification of lands considered suitable for wind energy development and recommended that the approach be amended prior to adoption. Notwithstanding this recommendation, the 1km settlement buffer was ultimately retained within the adopted RES, meaning that a key concern identified by the OPR in relation to the methodology and spatial strategy remained unaddressed.

The OPR issues three formal recommendations. Recommendation 1 concerns methodology and evidence. It objects to the use of a 1km settlement buffer, outdated flood risk mapping, and reliance on an old landscape character appraisal. Recommendation 2 concerns renewable energy and infrastructure policies. The OPR recommends removing policy wording that makes undergrounding powerlines the preferred option, requires proof of grid capacity at planning stage, mandates certain pre-planning consultations, and prohibits bioenergy projects where amenity impacts are identified. The OPR considers these provisions inconsistent with national climate, energy and grid policy and overly restrictive of future renewable development.

Recommendation 3 focuses on environmental assessment. The OPR notes that both the Strategic Environmental Assessment (SEA) and Natura Impact Report (NIR) rely on mitigation measures that were not fully incorporated into the draft strategy. Overall, the OPR's submission seeks a more evidence-based, flexible and policy-aligned strategy that facilitates renewable energy delivery while maintaining environmental safeguards.

Department of Climate, Energy and the Environment Submission

The Department of Climate, Energy and the Environment (DCEE) also made a submission on the Mayo Draft Renewable Energy Strategy, emphasising the importance of the strategy in supporting Ireland's legally binding climate and renewable energy targets. The Department highlights the critical role of the planning system in facilitating the delivery of renewable electricity generation, grid infrastructure, energy security and broader climate objectives set out in the Climate Action Plan, the revised National Planning Framework (NPF), and the Planning and Development Act 2024. The submission notes that Ireland must significantly increase renewable energy generation capacity to meet rising electricity demand and achieve national decarbonisation objectives.

A key theme of the submission is the need for the Mayo Renewable Energy Strategy to align with the ongoing preparation of the revised Regional Spatial and Economic Strategies (RSES) which will likely implement any subsequent updates from the anticipated implementation of the Planning and Development Act 2024. The Department advises that the strategy should be

based on the most up-to-date national and regional methodologies and should remain consistent with emerging policy frameworks that will establish renewable electricity capacity allocations and target power capacities for local authorities.

The Department also raises concerns regarding a number of provisions that it considers could unnecessarily constrain the delivery of renewable energy projects and associated electricity infrastructure. In particular, it recommends the removal of objectives that identify undergrounding as the preferred option for powerlines, require wind energy developments to demonstrate available grid capacity at planning stage, or prioritise locations solely based on proximity to existing grid infrastructure. The Department considers such requirements to be inconsistent with national objectives relating to grid expansion, energy security and the accelerated deployment of renewable energy infrastructure.

The submission further objects to the application of a 1km settlement buffer as a constraint on wind energy development. The Department notes that such a buffer is not provided for in the Wind Energy Development Guidelines and may inappropriately influence the identification of suitable areas for renewable energy projects. It therefore recommends that the methodology and constraints analysis underpinning the strategy be amended to remove the 1km settlement buffer and to ensure a more evidence-based approach to site assessment.

Finally, the Department highlights the requirements arising from the transposition of the EU Renewable Energy Directive (RED III) and associated updates to the Planning and Development Regulations, 2001 (as amended). In this regard, it recommends the deletion of policy wording that would require pre-planning consultations to advise on the likelihood of securing timely planning approval for renewable energy projects. The Department considers that such provisions are unnecessary in light of the statutory timelines and permitting reforms introduced to facilitate the efficient delivery of renewable energy developments. Overall, the submission seeks a renewable energy strategy that is more closely aligned with national policy, supports renewable energy deployment and grid development, and avoids unnecessary planning constraints that may hinder the achievement of climate and energy targets.

Chief Executive's Report

The Chief Executive's Report summarised Greensource's concerns as relating to prematurity, restrictive methodology, landscape and peatland constraints, wind zoning, repowering restrictions, and the redesignation of several project sites. The Chief Executive rejected the request to pause the RES, noting that preparation of an updated strategy is a mandatory requirement under Objective REO7 of the Mayo County Development Plan and is intended as an interim framework pending publication of the new RSES.

On methodology, the Chief Executive stated that the RES follows the SEAI Local Authority Renewable Energy Strategy (LARES) methodology and is supported by SEA and Appropriate Assessment. The Chief Executive also rejected Greensource's request to remove spatial guidance on repowering, arguing that the proposed framework is not overly restrictive and that projects can still be assessed on their individual merits.

In response to the submission received by the Office of Planning Regulator, the Chief Executive largely accepts the OPR's recommendations. For Recommendation 1, the Chief Executive accepted the OPR recommendation of removing the 1km buffer around settlements and to

subsequently update Map 5.6 of the Draft RES, as well as update maps 6.8 and 6.10 accordingly. However, this recommendation was not captured in the RES as adopted on 13th July 2026. Map 5.6 of the RES as adopted includes this 1km buffer, and therefore is not in compliance with the Wind Energy Guidelines or national policy pertaining to the promotion of renewable energy development in suitable locations.

Separately, the Chief Executive did not accept the OPR's recommendation to undertake a new landscape character appraisal, arguing that the existing appraisal remains fit for purpose until a regional landscape assessment is completed.

For Recommendation 2, the Council accepts the OPR's concerns about restrictive policy wording. The Chief Executive recommends removing provisions requiring undergrounding as the preferred option, requiring proof of grid capacity, requiring certain RED III pre-planning wording, and prohibiting bioenergy projects based solely on amenity considerations. These changes are presented as bringing the strategy into better alignment with national climate and energy policy. For Recommendation 3, the Council accepts the need to incorporate SEA and Appropriate Assessment mitigation measures into the RES and recommends amending the plan accordingly

Overall, the Greensource submission was effectively rejected in full, with no direct plan changes proposed. By contrast, the OPR submission drove most of the significant amendments to the RES, particularly removal of restrictive grid and infrastructure policies, elimination of the updated flood mapping, and incorporation of environmental mitigation measures. The only notable OPR recommendation not accepted at this stage was the request to update the County Landscape Character Appraisal. However, as discussed above, the removal of the 1km buffer was not captured in the adopted RES, despite the Chief Executive accepting this recommendation.

3.4.2.2 Adoption of Updated Renewable Energy Strategy

Following on from the Special Council Meeting on 13th July 2026 whereby the Draft Renewable Energy Strategy for County Mayo was adopted, a number of changes were made to the Draft RES which are summarized in table 3.3 below.

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Table 3-3 - Comparison of Draft RES and Adopted RES

Draft RES	Adopted RES
Settlements Constraint: "A buffer zone of 1km has been identified from each settlement (Map 5.6)."	**NO CHANGE**: OPR and DCEE requested update and CE accepted Recommendation. However, the below appears in Section 5.8.4 of Adopted RES: "A buffer zone of 1km has been identified from each settlement (Map 5.6)."
Map 5.7 used incorrect/superseded flood mapping.	**CHANGE:** Map 5.7 updated using correct and current flood datasets.
Strategic Objective (p.27): "...Consideration will be given to the undergrounding or alternative routes in the siting of powerlines in both visually and environmentally sensitive areas. Undergrounding will be the preferred option."	**CHANGE:** "Undergrounding will be the preferred option" removed. Undergrounding considered case-by-case through development management.
Strategic Objective (p.42): "ensure that all proposals for wind energy development (including that located in repower areas) can demonstrate that there is sufficient grid capacity available to accommodate its connection."	**REMOVED** in full.
Strategic Objective (p.50): "ensure sites for new wind farm developments are near to the existing electricity grid infrastructure thus minimising grid connection challenges whilst enhancing overall efficiency of renewable energy integration."	**REMOVED**

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Strategic Objective (p.50): "ensure that all proposals for wind energy development can demonstrate that there is sufficient grid capacity available to accommodate its connection."	**REMOVED**
Strategic Objective (p.53): "ensure that all proposals for solar development of-scale can demonstrate that there is grid capacity sufficient available to accommodate its connection."	**REMOVED**
Strategic Objectives pp.50, 53 & 55: "...Such consultations will identify potential constraints, community concerns and advise on the likelihood or not of securing timely planning approval (RED III)."	**CHANGED:** All wording relating to advising on likelihood of securing planning approval removed.
Bioenergy Objective (p.55): "Bioenergy installations shall not be permitted in areas where such development would adversely impact the residential or visual amenity."	**REMOVED:** Amenity issues to be considered through application assessment process.
Draft RES did not explicitly incorporate all SEA and AA mitigation measures.	**ADDED:** Explicit commitment to implement SEA mitigation measures and Appropriate Assessment mitigation measures.
Peatlands treated as unsuitable without flexibility provision.	**ADDED:** "Notwithstanding the above, a degree of flexibility may be applied in respect of less sensitive or previously modified peatlands..." with requirement for site-specific assessment.

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No specific Green Energy Park policy.	**ADDED:** "Green energy parks are plan-led locations that co-locate renewable energy generation with supporting infrastructure and energy-intensive users..." under Section 2.2.11.
Tourism objective referenced heritage assets but not coastal trails.	**CHANGED:** Tourism objective expanded to include "Spiritual Trails and Coastal Trails".
Ireland West Airport safeguarding mapping and text unclear.	**CHANGED:** New safeguarding map and revised aviation safeguarding text inserted.
Existing Landscape Character Appraisal retained in Draft RES.	**NO CHANGE**: OPR requested update but CE recommendation was not to amend at this stage. Council will await future Regional Landscape Character Assessment.

The New RES uses a five-step methodology process to determine areas suitable for wind energy development within the County, and this methodology is summarized in Table 3-4 below.

Table 3-4 - Methodology used for Renewable Energy Strategy for County Mayo (July 2026)

Step Involved	Process Involved
Step One – Determining Areas of Wind Potential	Determining wind speeds across the County using a Wind Atlas published in 2003 by the Wind Speeds Sustainable Energy Authority of Ireland (SEAI).
Step Two – Analysis of Wind Energy Constraints	Overlaying Wind Energy Constraints mapping, and these constraints are categorized in terms of - Ecologically Important Consideration including European Designated sites & Natural Heritage Areas, - Practical Resource Constraints, - Accessible Resource Constraints, and - Other important Elements of Constraint
Step Three – Cumulative Impact	Analysis of existing and proposed wind farm projects within the County to ascertain cumulative impact
Step Four – Analysis of areas not subject to constraints	Analyse the areas not subject to constraints, including the sensitivity of the landscapes in these areas to wind energy development.
Step Five – Determination of areas deemed 'Open to Consideration'	Overlay Steps 1-4 to ascertain areas open to consideration for wind energy development. This will also take into consideration the landscape sensitivities and wind energy designations of adjoining local authority areas. In addition, the step also involves an examination of relationship with adjoining Counties in relation to critical infrastructure, renewable energy potential and existing grid infrastructure. Of note, maps 6.11 – 6.13 prepared and included in the RES show these elements for County Mayo only, and not adjoining counties such as Galway or Sligo.

3.4.2.3 Analysis of Methodology used for Renewable Energy Strategy

Although the subject lands appear to be partially located within an 'Open for Consideration' area in Maps 6.8 and 6.9 of the RES, Step Three of the methodology does not include any accompanying mapping or clear explanation of how lands progress from the constraints analysis to the final suitability classifications. Following on from this, Step Four introduces the Wind Suitability Map (Map 6.10), which identifies lands as 'Open for Consideration', 'Repowering Potential' and 'Unsuitable'. Notwithstanding the absence of a transparent intermediate assessment stage, the subject lands are ultimately classified as 'Unsuitable' without any clear justification as to how this designation was reached.

A review of the RES methodology indicates that this outcome is largely driven by the cumulative effect of the Step Two constraints analysis. Under Step Two, a series of strategic constraints are mapped and overlaid, including ecological constraints, practical resource constraints, accessibility constraints and other environmental considerations. Whilst such an approach may be appropriate as a high-level county-wide screening exercise, the application of broad strategic constraints appears to have had a significant influence on the designation of lands in the vicinity of the Proposed Development.

In particular, the RES zoning maps highlight the introduction of extensive buffer zones around certain lakes within the County, most notably Lough Corrib, Lough Mask, Lough Conn and Lough Cullin. These lakes are designated Natura 2000 sites, including Special Protection Areas (SPAs), reflecting their ecological importance and sensitivity. While a precautionary approach to development in proximity to these designated sites is appropriate, the zoning methodology applies broad, arbitrary constraints over extensive areas surrounding these waterbodies. The result is that large areas of land are effectively removed from further consideration at a strategic level before any site-specific assessment has been undertaken.

Figure 3-4 - Map 6.8 of Mayo RES (Settlements with 1km buffer and 500m buffer on Lakes and Elevated Areas)

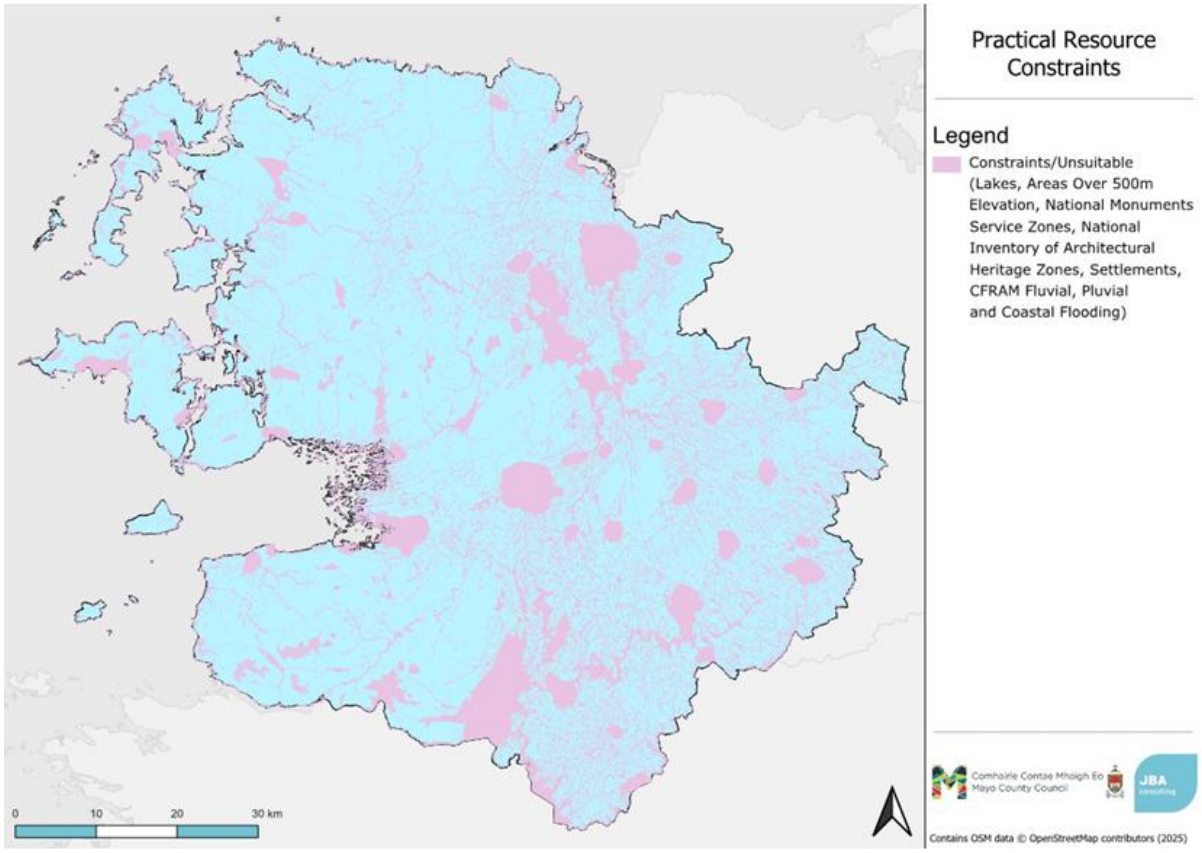
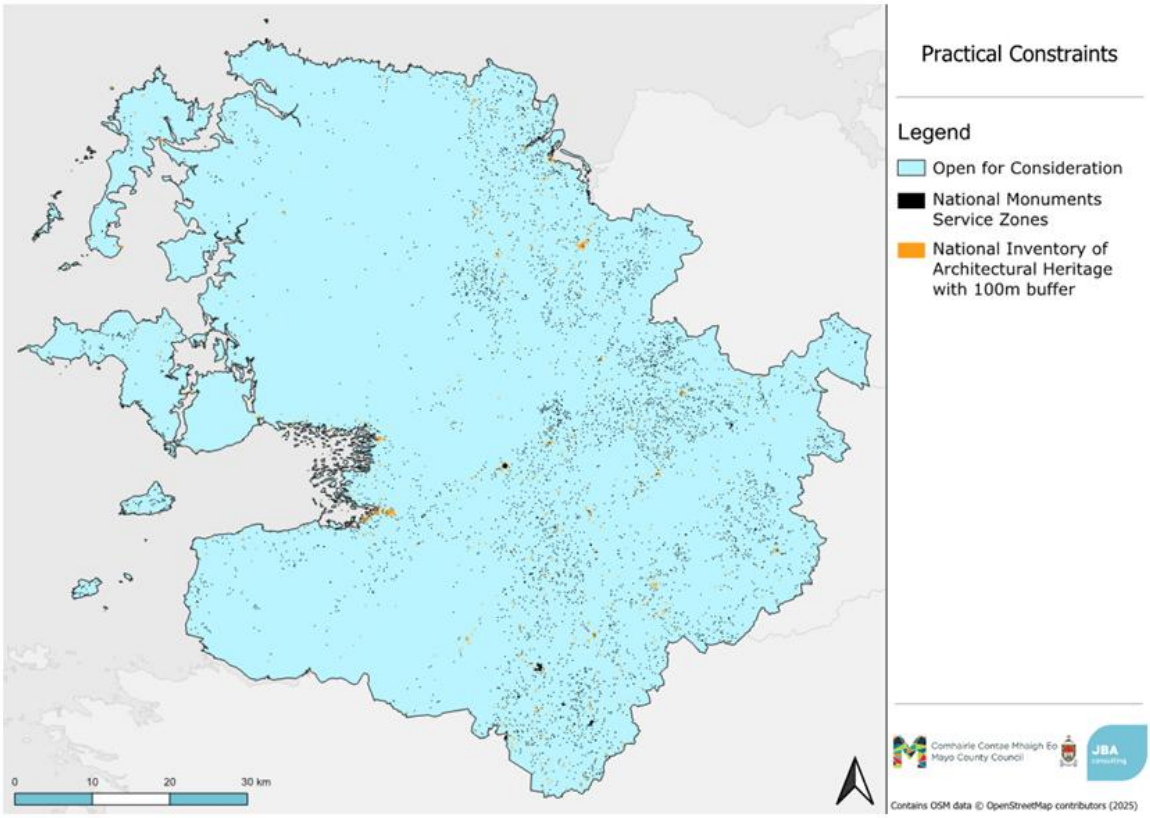


Figure 3-5 - Map 6.9 of Mayo RES (100m Buffer on Archaeological Heritage areas)



With specific reference to the Proposed Development, the subject lands are located on the periphery of the identified Lough Corrib constraint area. As a consequence of the methodology employed in the RES, significant portions of the site fall within lands designated as 'Unsuitable', notwithstanding the fact that the site itself is not located within any Natura 2000 designation and is physically removed from the core ecological receptors associated with Lough Corrib.

Furthermore, there is no evidence presented within the RES demonstrating that a wind energy development on these lands would, by reason of location alone, give rise to significant adverse effects on the integrity of the Lough Corrib SPA or any other designated site. Such matters are more appropriately examined through the project-level Appropriate Assessment and Environmental Impact Assessment processes, where site-specific surveys, ecological analysis and mitigation measures can be fully considered.

It is also noteworthy that the final designation of the subject lands appears to have been heavily influenced by the Landscape Character Assessment utilised within the RES. The landscape sensitivity framework relied upon by the RES originates from the Mayo Landscape Appraisal, published in 2008. The continued reliance on this assessment is significant given that the Mayo County Development Plan 2022-2028 includes an explicit objective to review and update the Landscape Appraisal following the publication of national guidance on Local Landscape Character Assessments and to ensure consistency with evolving regional landscape policy. Notwithstanding this commitment, the RES continues to rely on the existing landscape evidence base in determining wind energy suitability.

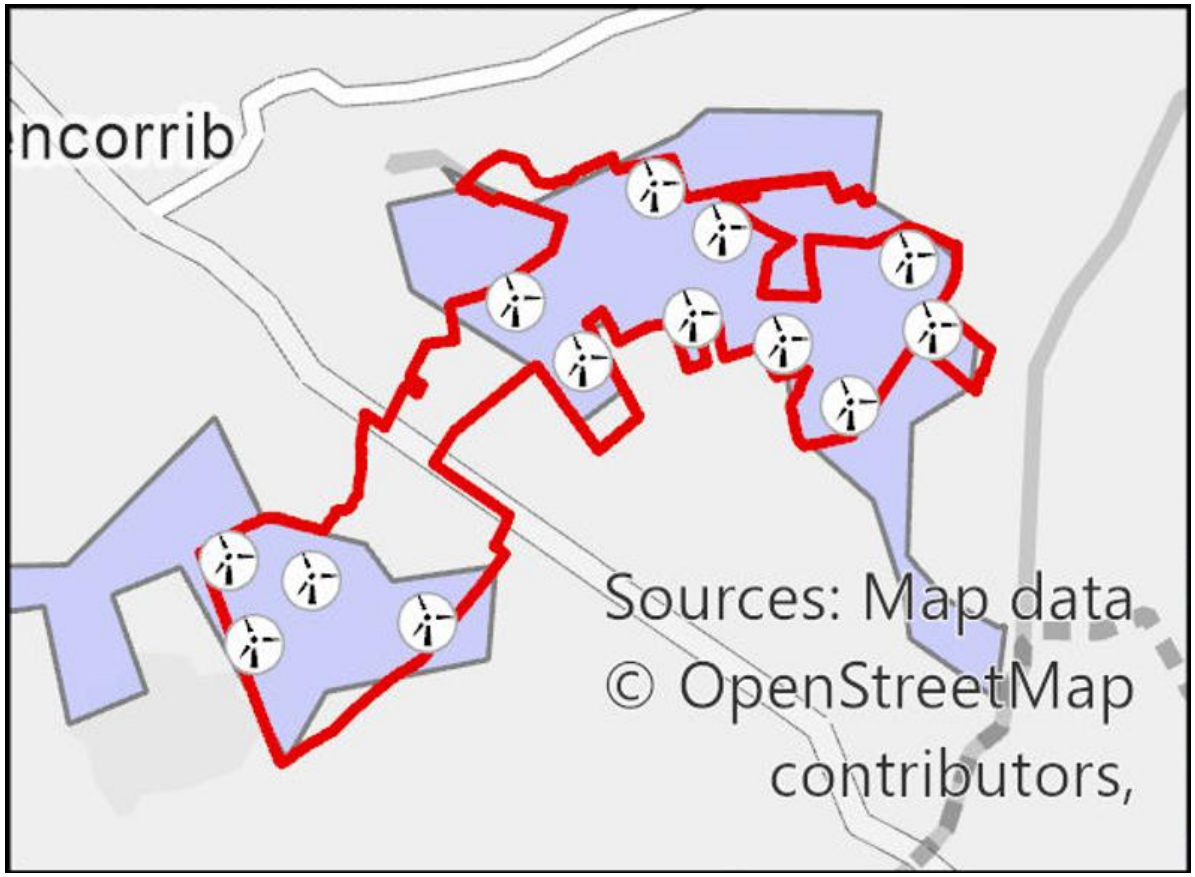
As a result, the final suitability mapping is influenced by a landscape framework that predates significant developments in renewable energy policy, climate legislation and national planning policy. In the case of the Proposed Development, the combined effect of broad-scale

environmental constraints, extensive Lough Corrib buffer areas and a landscape appraisal acknowledged by the Development Plan as requiring review has resulted in lands previously considered capable of accommodating wind energy development being redesignated as 'Unsuitable'.

It is prudent to note that the site selection process was heavily informed and influenced by the land use designation on site which was in place until July of 2026. The 'Open for Consideration' land use designation which was designated on this site until July of this year had essentially been a driving force behind the development potential of the site itself, and thus initial site surveys and environmental assessments were carried out on that basis. Please refer to Chapter 3 (Consideration of Reasonable Alternatives) of the enclosed EIAR for further detail.

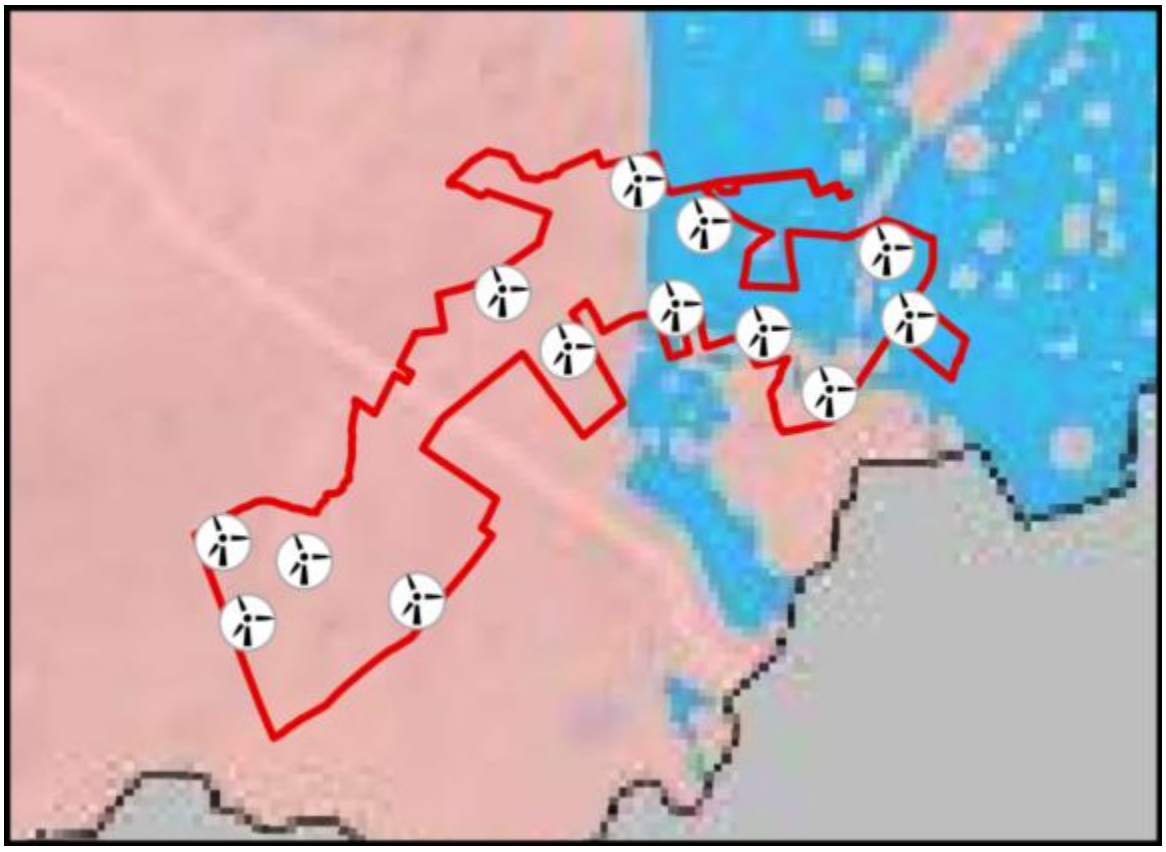
Please refer to Figure 3-6 below, which identifies the location of the proposed turbines in the context of the Mayo Renewable Energy Strategy 2011-2020. The areas shown in purple are lands designated as 'Open for Consideration'.

Figure 3-6 - Location of Proposed Turbines in 2011 - 2020 Mayo RES



Similarly, Figure 3-7 illustrates the location of the proposed turbines relative to the adopted Mayo Renewable Energy Strategy (2026), where areas shown in blue are designated 'Open for Consideration' and areas shown in pink are designated 'Unsuitable'. The comparison demonstrates the significant change in zoning classification affecting the subject lands notwithstanding the absence of any material change in the underlying characteristics of the site.

Figure 3-7 - Location of Proposed Turbines in updated RES (July 2026)



3.4.2.4 Settlement Buffers and Wind Strategy Mapping in Adopted RES

A matter of particular relevance to this assessment is the treatment of settlement buffers within the Draft Mayo Renewable Energy Strategy and the subsequent amendments recommended by the Chief Executive.

The original Draft RES applied a 1km buffer around settlements, which was incorporated into the constraints mapping and informed the preparation of the Wind Strategy Maps, including Map 6.10 and Map 6.14 (Wind Potential Lands). However, during the statutory consultation process, the Office of the Planning Regulator (OPR) and the Department of Climate, Energy and the Environment (DCEE) both concluded that the 1km settlement buffer was inconsistent with national guidance and had exerted an undue influence on the identification of wind energy lands. The Chief Executive accepted these submissions and recommended that the 1km settlement buffer be removed from the RES.

The Chief Executive specifically recommended:

> "Remove 1km buffer around settlements and amend Map 5.6, Map 6.8 and Map 6.10 of Draft"

and replace it with the provision that:

> "Separation distances from residential units will be determined by the most up to date guidelines".

However, this recommendation was ultimately rejected by Elected Members, and the 1km buffer subsequently appears in the RES as adopted in July of 2026. This recommendation is significant because it represents an acknowledgment by the Planning Authority that the blanket 1km settlement buffer may not constitute an appropriate strategic planning constraint on wind energy development. Notwithstanding the Chief Executive's recommendation that the buffer be removed, the final adopted RES retained the 1km settlement buffer as part of the spatial framework. Accordingly, a degree of inconsistency remains between the rationale set out in the Chief Executive's Report and the final adopted strategy. In relation to the subject site, the removal of this 1km settlement buffer would have resulted in a significant portion of the site remaining in an 'Open for Consideration' land use zoning. It is therefore considered that the retention of this 1km settlement buffer has had a direct, negative impact on the subject lands in this regard.

In this regard, it is notable that both the OPR and the DCEE expressed concerns regarding the application of a blanket settlement-based constraint and instead emphasised the importance of project-level assessment and the application of national wind energy policy. While the adopted RES retained the settlement buffer, the appropriateness of applying fixed strategic separation distances remains open to question, particularly where national guidance generally advocates a site-specific assessment of residential amenity, environmental effects and landscape capacity.

Furthermore, while the adopted RES resulted in a modest increase in the quantity of lands identified as "Open for Consideration", the practical implications of this increase require careful consideration. Wind Energy Ireland's review of the draft strategy found that approximately 95% of the lands identified as "Open for Consideration" are located within 500m of a residential Eircode. This suggests that a significant proportion of the nominally available landbank may be constrained in practice when residential amenity considerations, turbine setbacks, environmental designations, archaeological constraints and other development management requirements are considered. Accordingly, the apparent increase in lands available for wind energy development may not translate into a commensurate increase in realistically developable areas.

Consequently, caution should be exercised when attributing substantial weight to settlement-based exclusions within the RES, particularly where such constraints extend beyond those expressly required by national policy or guidance and where they may unnecessarily sterilise otherwise suitable lands for renewable energy development.

3.4.2.5 Other Considerations

UNESCO Joyce Country and Western Lakes Geopark

Page 36 of the updated Strategy states the following in relation to the UNESCO Joyce County and Western Geopark:

> *"ensure that the integrity of landscapes at the Céide Fields which holds potential as a UNESCO sites, and the landscapes of the UNESCO Joyce County and Western Geopark are safeguarded and protected from inappropriate development particularly large-scale wind energy development and related infrastructure. "*

It is noted that the Joyce Country and Western Lakes Geopark has recently been designated as a UNESCO Global Geopark. When reviewing the criteria for UNESCO Global Geoparks (Operational guidelines for UNESCO Global Geoparks 2015), it is apparent that the proposed project has an opportunity to enhance the designation in terms of promoting awareness of climate change and the need for the sustainable use of Earth's natural resources.

> *"UNESCO Global Geoparks should use that heritage, in connection with all other aspects of that area's natural and cultural heritage, to promote awareness of key issues facing society in the context of the dynamic planet we all live on, including but not limited to increasing knowledge and understanding of: geoprocesses; geohazards; climate change; the need for the sustainable use of Earth's natural resources; the evolution of life and the empowerment of indigenous peoples"*[1]

It is prudent to note that the presence of wind energy development within a UNESCO Global Geopark is not, in itself, incompatible with UNESCO Geopark designation. In fact, the existing Galway Wind Park is located partially within the Joyce Country and Western Lakes Geopark and the Geopark subsequently attained UNESCO Global Geopark status. Similarly, other operational wind energy developments are located within other UNESCO Global Geoparks in Ireland, including the Slieve Rushen Wind Farm within the Cuilcagh Lakelands UNESCO Global Geopark. There are numerous other UNESCO Global Geoparks that enjoy their designations and actively promote the credentials of operational wind farms within their boundaries, some examples include the Meikle Wind Farm, which consists of 61 wind turbines and is the largest wind facility in British Columbia and is located within the Tumbler Ridge Geopark in British Columbia, Canada and, Midtfjellet Vindpark which consists of 55 wind turbines in Sunnhordland UNESCO Global Geopark in Norway and is the largest operational wind farm in Norway. These examples demonstrate that appropriately sited and designed wind energy developments can not only coexist with UNESCO Global Geopark designations, but can enhance the credentials of the designation and the Rooaunalaghta Green Energy Project presents an opportunity to promote the sustainable use of Earth's natural resources for the Joyce Country and Western Lakes Geopark.

3.4.2.6 Conclusion on Renewable Energy Strategy Mapping and Climate Policy Alignment

Having regard to the foregoing, it is considered that limited weight should be attached to the designation of the subject lands as 'Unsuitable' within the adopted Renewable Energy Strategy. The rationale underpinning this designation is not clearly demonstrated within the published methodology and there is an absence of transparent mapping showing how lands transition between the various stages of assessment. As a consequence, it is difficult to establish the evidential basis upon which the subject lands were ultimately excluded from further consideration for wind energy development, particularly given the fact that they were included in previous iterations of the RES.

As outlined above, the assessment also demonstrates that the final suitability mapping is heavily influenced by strategic-level constraints, including extensive Natura 2000 buffer areas associated with Lough Corrib and other designated waterbodies, together with landscape

[1] Operational Guidelines for UNESCO Global Geoparks, UNESCO, 2015

sensitivity classifications derived from the Mayo Landscape Appraisal (2008). Notwithstanding the acknowledged need within the Mayo County Development Plan 2022-2028 to review and update this landscape evidence base, the adopted RES continues to rely on a framework which predates substantial developments in national climate policy, renewable energy targets and planning guidance and is demonstrably not consistent with the plans and policies listed in section 15 of the Climate Acts .

Similarly, the treatment of settlement buffers throughout the preparation of the RES raises questions regarding the robustness of the final mapping. The Office of the Planning Regulator and the Department of Climate, Energy and the Environment both concluded that the proposed 1km settlement buffer was inconsistent with national policy and should be removed.

Taken together, these factors suggest that the adopted suitability mapping reflects a precautionary and restrictive approach to wind energy development which does not align with the policy direction established at national and regional level. Current renewable energy policy seeks to significantly increase the delivery of onshore wind infrastructure in support of decarbonisation, security of energy supply and the transition to a climate-neutral economy. This policy landscape is expected to become increasingly ambitious over the lifetime of the Development Plan and Renewable Energy Strategy as Ireland progresses towards its statutory climate obligations and renewable electricity targets. Crucially, Ireland will likely miss its 2030 renewable energy targets and therefore it is imperative that onshore wind development is consented at appropriate locations.

In this context, the designation of substantial areas of land as 'Unsuitable' on the basis of broad strategic constraints, outdated landscape evidence and previously identified settlement exclusion methodologies risks unduly restricting the availability of lands capable of accommodating appropriately designed wind energy development. The subject lands provide a clear example of this issue, where the zoning designation has changed significantly notwithstanding the absence of any material change in the site's physical characteristics, wind resource, accessibility, or environmental context.

Accordingly, it is considered that the adopted RES should not be interpreted as creating an absolute prohibition on wind energy development within the subject lands. Rather, the suitability mapping should be viewed as a broad strategic guide which must be balanced against national renewable energy objectives, current climate action commitments, and the findings of detailed project-level environmental assessment. Where a proposal can demonstrate compliance with applicable environmental, ecological, landscape and residential amenity standards, it is put forward that significant weight should be afforded to the contribution such development can make towards achieving existing and future climate action and renewable energy objectives.

Please refer to Figures 3-8 and 3-9 below which outline the Proposed Development in the context of the 2011-2020 RES and 2026 RES for County Mayo, respectively.

Figure 3-8 - Map 8 of Mayo County RES 2011 – 2020

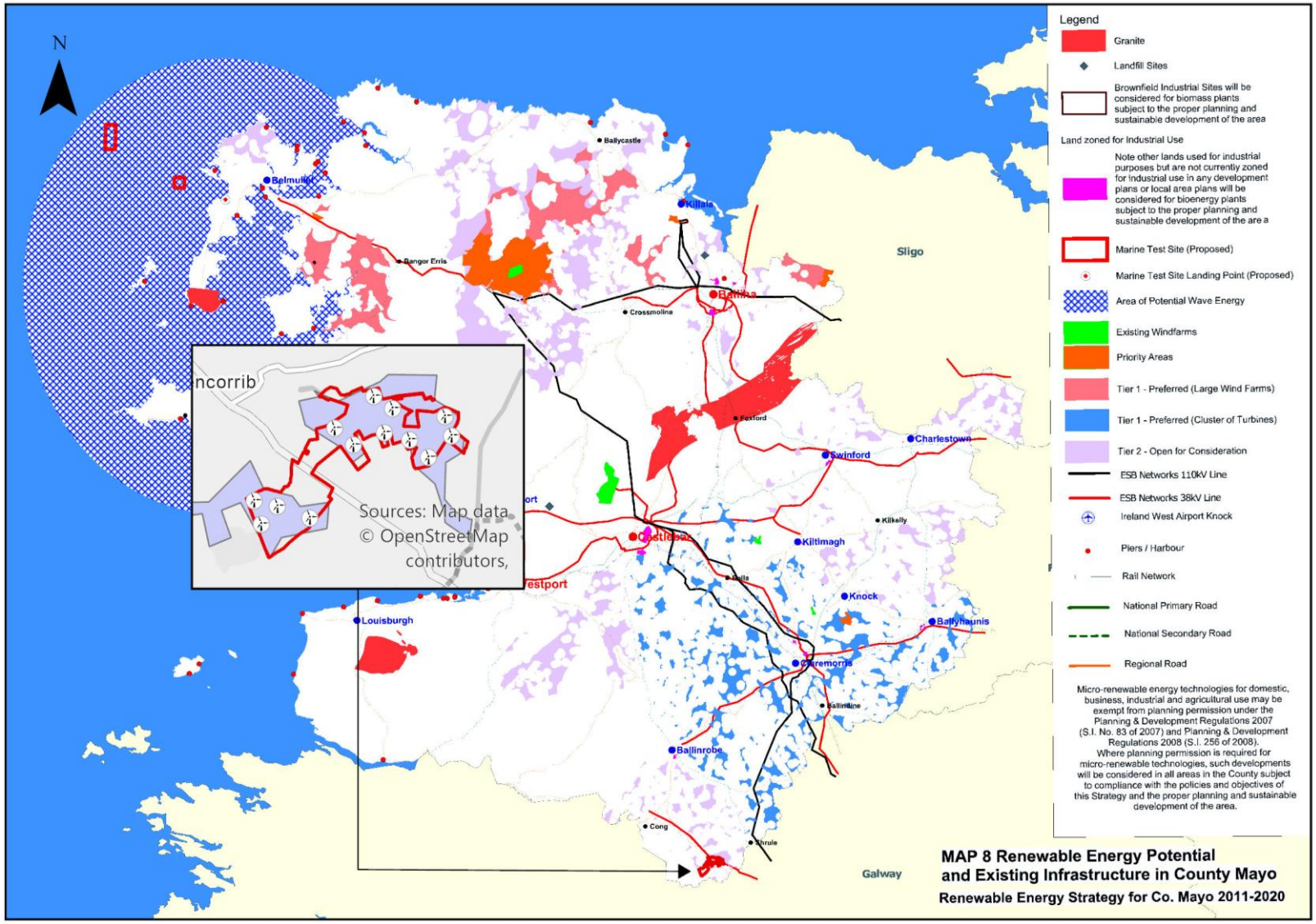
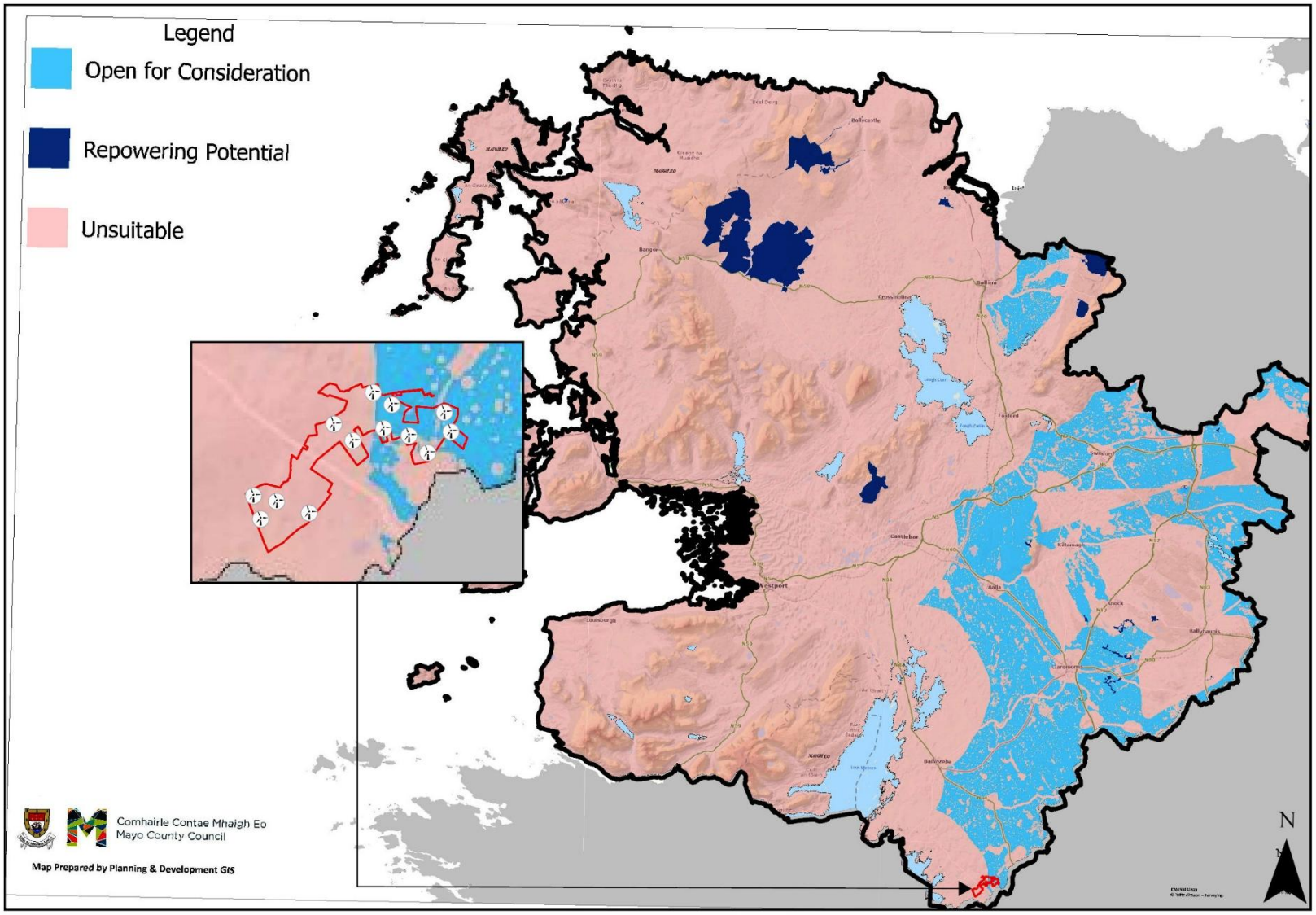


Figure 3-9 - Wind Strategy Map (Map 6.14, Mayo Renewable Energy Strategy July 2026)



3.4.3 Galway County Development Plan 2022 – 2028

The Galway County Development Plan 2022-2028 (Galway CDP) provides the statutory framework for the proper planning and sustainable development of County Galway and in doing so, also supports the transition to a low-carbon economy through the promotion of renewable energy development and associated infrastructure.

The Galway County Development Plan 2022-2028 recognises the importance of renewable energy and associated infrastructure in achieving climate action objectives. The strategic aim of Chapter 14, *Climate Change, Energy and Renewable Resource*, is:

> *"To reduce the carbon footprint by integrating climate action into the planning system in support of national targets, support indigenous renewable sources in order to reduce dependence on fossil fuels and improve security of supply and the move to a competitive low carbon economy."*

Furthermore, the Plan further acknowledges *"the importance of supporting the development of renewable energy resources and related infrastructure"* and recognises the role of renewable energy in delivering national climate and energy targets.

Appendix 1 of the Galway County Development Plan includes a Renewable Energy Strategy (RES) which adopts a plan-led approach to renewable energy development. The RES states:

> *"It is the policy objective of Galway County Council to maximise wind potential development on a case by case basis, subject to meeting specific requirements and guidance contained within the strategy."*

In the case of the Proposed Development, it is noted that the proposed GCR transverses through the townlands of Largan, Joyce's Park, Shrulegrove, Carrowmore, Tonacooleen, Ralusk, Abbeytown, Ballinvoher, Killamanagh and Bunnasillagh, County Galway. In addition, the proposed 110 kV loop-in substation and associated 110 kV cables and interface masts to connect to the existing overhead line are located in the townlands of Killamanagh and Bunnasillagh, County Galway (the substation itself is within the former townland).

Accordingly, the Proposed Development does not engage the Galway CDP's wind energy spatial strategy in any substantive way. Rather, the relevance of the Galway CDP arises principally in relation to grid infrastructure, electricity infrastructure and transportation objectives.

The following grid infrastructure, electricity infrastructure and transportation policies and objectives are provided under the Plan in support of the Proposed Development:

- **DM Standard 41: Electricity Transmissions lines:** Electricity transmission lines are an essential and inevitable element in providing the necessary energy for economic and social progress. The development of electricity transmission lines shall be subject to the following:

  Landscape Sensitivity

  Seek to locate electricity transmission lines in non scenic amenity areas where possible, having regard to the Landscape Sensitivity Rating Assessment of the County. In instances where their location in a Class 3(Special) or 4 (Iconic) landscape category areas or in proximity to a National Monument, Protected Structure, Architectural Conservation Area (ACA) or within a scenic

route/protected view is essential, it shall be necessary to minimise their obstructiveness in as far as is practically possible. A Visual Impact Assessment (VIA) shall be required to be submitted with planning applications for these locations.

Amenity Impacts

New transmission lines should have regard to existing residential amenity and environmental designations and should mitigate against any significant diminution of views of special amenity value.

Applications

Applications for new transmission lines shall be accompanied by a justification statement of the regional importance of, and demonstrated need for, the Proposed Development in strengthening the electricity network in the region.

- **EG 1 Enhancement of Electricity Infrastructure:** Support and promote the sustainable improvement and expansion of the electricity transmission and distribution network that supply the County, while taking into consideration landscape, residential, amenity and environmental considerations.
- **EG 2 Delivery of Electricity and Gas Infrastructure:** Support the provision and extension of electricity and gas transmission networks within the county which are critical to the economic development of the County subject to environmental quality, landscape, wildlife, habitats or residential amenity.
- **EG 3 Power Capacity:** To support and liaise with statutory and other energy providers in relation to power generation, in order to ensure adequate power capacity for the existing and future needs of the County.
- **EG 4 Ireland's Grid Development Strategy:** Support the implementation of Ireland's Grid Development Strategy, while taking into account landscape, residential, amenity and environmental considerations.
- **NP 3 Noise Impact Assessments:** To require an assessment of impact of the development on noise levels, having regard to the provisions of the Environmental Protection Agency Acts 1992 and 2003 and the EPA Noise Regulations 1994 when assessing planning application.
- **NP 5 Noise Mitigation Measures:** Require activities likely to give rise to excessive noise to install noise mitigation measures and monitors. The provision of a noise audit may be required where appropriate.

Having regard to the limited extent of works proposed within County Galway, it is considered that the Proposed Development is consistent with the Galway CDP's broader objectives supporting renewable energy delivery through the appropriate design and siting of associated infrastructure, such as the GCR and 33 kV loop-in substation proposed as part of the Rooaunalaghta Green Energy project. In particular, the Proposed Development is consistent with Policy Objectives EG 4, NP 3 and NP 5 as both the GCR and 33 kV loop-in substation have been designed in order to ensure minimal disruption in terms of noise impact. In addition, the provision of this infrastructure in County Galway also directly supports and aligns with Policy Objective EG 1 as it will enhance existing electricity infrastructure within the County itself.

Please refer to Chapter 12 (Noise and Vibration) of the enclosed EIAR for further detail on the proposed GCR and 33 kV loop-in substation elements of the Proposed Development.

3.5 RENEWABLE ENERGY DESIGNATION POLICY STATEMENT

The proposed development is considered to be a RED III project and this position was confirmed by An Coimisiún Pleanála.

The proposed Rooaunalaghta Green Energy project aligns with national, regional and local policy objectives supporting the transition to renewable energy generation and the achievement of Ireland's climate action and energy security targets. The site is located within an area which is partially located in an 'Open for Consideration' area as per the Renewable Energy Strategy for County Mayo which was adopted in July 2026, and the site selection process was heavily informed by the previous Renewable Energy Strategy for Mayo in which the entire site was located in an 'Open for Consideration' area.

As such, it is considered that the proposed development will contribute to increasing the proportion of electricity generated from renewable sources and supports the objectives of facilitating appropriately sited renewable energy projects in accordance with sustainable planning principles.

The proposed development has been designed having regard to environmental considerations, residential amenity and technical constraints. Accordingly, it is considered consistent with the renewable energy policy at a European, National, Regional and local level, which seeks to accelerate the delivery of renewable energy infrastructure while ensuring appropriate environmental sensitivities are carefully managed and maintained.

4. RATIONALE TO CONSENT IN CONTRAVENTION OF MAYO COUNTY DEVELOPMENT PLAN 2022 – 2028

This section of the report will examine and challenge the degree of consideration required for strategic infrastructure development under the local County Development Plan by looking at the legal basis and the Planning and Development Act.

4.1 LEGAL BASIS

Pursuant to the Planning and Development Act 2000, as amended, for Strategic Infrastructure Development projects, the Commission shall *consider* the provisions of the local County Development Plan but is not required to make decisions that *are consistent with* it and may decide to grant a permission for development, even if the Proposed Development, or part thereof, contravenes materially the development plan.

Therefore, as a matter of jurisdiction, the Commission has discretion under the Planning and Development Act 2000 to grant permission for the Proposed Development.

As a portion of the subject site is located within an area deemed 'Unsuitable' for development, the Proposed Development is contrary to the Mayo County Development Plan 2022 – 2028. Therefore, the Proposed Development could be interpreted as a material contravention of this Plan. This section of the report will examine the Proposed Development within the context of material contravention, which is set out under Section 37G of the Planning and Development Act (as amended).

4.2 PLANNING AND DEVELOPMENT ACT, 2000 (AS AMENDED)

Under section 37G (6) of the Planning and Development Act, 2000 (as amended), the Commission has the power to grant planning permission in material contravention of a local County Development Plan. In this respect section 37G(6) states:

> *"The Board may decide to grant a permission for development, or any part of a development, under this section even if the proposed development, or part thereof, contravenes materially the development plan relating to any area in which it is proposed to situate the development".*

Under Section 37G(2) of the Planning and Development Act, 2000 (as amended) there are certain matters which the Commission shall consider in its determination, in particular this states:

> *(2) Without prejudice to the generality of subsection (1), the Board shall consider—*
>
> *(a) the environmental impact assessment report submitted under section 37E(1), any submissions or observations made, in response to the invitation referred to in section 37E(3), within the period referred to in that provision, the report (and the recommendations and record, if any, attached to it) submitted by a planning authority in accordance with section 37E(4), any information furnished in accordance with section 37F(1) and any other relevant information before it relating to—*
>
> *(i) the likely consequences of the proposed development for proper planning and sustainable development in the area in which it is proposed to situate the development, and*

(ii) the likely effects on the environment of the proposed development,

…

(c) the provisions of the development plan or plans for the area,

…

(g) the matters referred to in section 143, [that being –

(a) the policies and objectives for the time being of the Government, a State authority, the Minister, planning authorities and any other body which is a public authority whose functions have, or may have, a bearing on the proper planning and sustainable development of cities, towns or other areas, whether urban or rural,

(b) the national interest and any effect the performance of the Board's functions may have on issues of strategic economic or social importance to the State, and

(c) the National Planning Framework and any regional spatial and economic strategy for the time being in force.]

(h) any relevant provisions of this Act and of any regulations made under this Act.

As identified by Mr Justice Haughton in *Element Power v An Bord Pleanála* 2017 IEHC 550 (S68):

> *"Of course, even if there was a clear national strategy in relation to "spatial dimension", and while this would doubtless assist the Board, the Board under present legislation would not be obliged to follow such guidelines or plans, and in the exercise of its own judgement and expertise would be entitled to take a different view.* ***Equally if a local development plan adopted wind energy strategies with a more detailed "spatial dimension", for example by zoning particular areas as suitable for wind farm development, it would be open to the Board to grant permission for a proposed development, even if it was a material contravention of such zoning.*** *Section 37G(6) expressly empowers the Board to grant permission even if the development would materially contravene a development plan. Thus, while the Board must have regard to national and local strategy, it is not bound by it."*

This is the precise position that obtains in this case. The proposed Rooaunalaghta Green Energy project has unequivocal national and EU policy support but is not designated favourably for wind in the County Development Plan. All the Commission is obliged to do is have regard to the Plan.

There arethree *additional* reasons why the approach in *Element Power* is the correct one and should be followed in this instance:

Firstly, section 37(G)(2)(g) itself requires that regard is had to the matters referred to in section 143 of the Planning and Development Act 2000. This includes an obligation to have regard to

> *"(a) the policies and objectives for the time being of the Government, a State authority, the Minister, planning authorities and any other body which is a public authority whose functions have, or may have, a bearing on the proper planning and sustainable development of cities, towns or other areas, whether urban or rural,*

(b) the national interest and any effect the performance of the Board's functions may have on issues of strategic, economic or social importance to the State"

The climate crisis is clearly a matter to which the Commission has to have regard for the purposes of (b) and the policies and objectives for the purposes of (a) must include the Climate Action Plan, Carbon Budgets and Sectoral Emissions Ceilings. The Planning and Development Act 2000 identifies these policies and objectives as having *precisely* the same statutory weight as the County Development Plan.

As the Commission is aware, Ireland's renewable energy policy framework continues to evolve under Climate Action Plan 2025, which reaffirms the State's commitment to achieving legally binding carbon budgets and sectoral emissions ceilings. Climate Action Plan 2025 retains the national ambition to deliver substantial renewable electricity capacity by 2030, including 9 GW of onshore wind. Regional renewable electricity targets have been incorporated into the revised National Planning Framework and are intended to be translated through Regional Spatial and Economic Strategies and Regional Renewable Energy Strategies into local authority level targets, thereby informing city and county development plans. These plans and strategies remain critical to delivering Ireland's statutory climate obligations, energy security objectives and the transition to a climate-neutral economy by 2050

Secondly, the presumption that such projects are in the over-riding public interest and must be accorded priority is completely incompatible with the purported sterilisation of the County. However, it is not necessary for the Board to comply with this as *per Element Power*, the County Development Plan is simply one of the factors to which regard must be had.

Thirdly, the Commission is obliged under section 15 of the Climate Action and Low Carbon Development Act, 2015 (as amended) to carry out their functions in a manner consistent with the Climate Action Plan and the achievement of these targets.

Section 15 of the Climate Act obliges the Commission to perform its decision-making function (in so far as practicable) 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.

In the Coolglass case, Supreme Court held that it requires the Commission, to do more than simply 'have regard' to the Climate Action Plan, it must engage in a detailed consideration of the question where it is raised in the context of a particular planning application, were obliged to give reasons why it says its ultimate decision is consistent with these climate objectives and, to the extent it is not, it must identify the impracticalities that prevent it from so doing.

In this regard, it is noted that the Supreme Court held that the Commission is entitled to approach its decision on a particular planning application on a presumption that any strategy or development plan adopted is consistent with climate objectives, and that any decision consistent with such a plan and strategy will itself be consistent with those objectives, and

therefore in compliance with section 15. However, the Supreme Court also recognised that it is open to an applicant to demonstrate that compliance with a particular development plan would not be consistent with the objectives set down in section 15 and that the Commission, in order to comply with its own obligations under the section, would be obliged to depart from the development plan and exercise its discretion under section 37G(6) of the Planning Act. It is submitted that for the reasons set out in this Planning Statement that the Development Plan was not adopted in a manner consistent with climate objectives.

The Supreme Court went on to say that since the sequence of production of plans and strategies is not precisely integrated, it is possible that a development plan, which covers a five year period, may have been drafted by reference to earlier iterations of the national climate action plans. It said that it was therefore possible that a development plan, although compliant with the then contemporaneous climate action plan could be out of date and no longer comply with the current climate action plan.

The County Development Plan, which was adopted on 29th June 2022, is out of date in respect to the overarching national climate action policy, particularly in respect to the upcoming Planning and Development Act 2024, which is discussed further in Section 4.3 below. It is noted that Variation No. 1 of the Mayo County Development Plan included updates to land use zoning maps relating to new annual housing growth requirements and Variation No.2 of the Mayo County Development Plan relates to the implementation of an updated Renewable Energy Strategy in July 2026.

Furthermore, neither the Mayo County Development 2022 – 2028 or the Renewable Energy Strategy adopted in July of this year take into consideration the Climate Action Plan 2025 and the legally binding obligation to act in a manner consistent with this plan under the Climate Action and Low Carbon Amendment Act 2021. It should be noted it is a requirement under the Climate Act 2021 to align policies with the carbon budget framework and this has not occurred in relation to these plans. In simple terms, while we have legally binding targets for decarbonisation, supported by specific targets for renewable energy including onshore wind, the implementation of the newly adopted Renewable Energy Strategy for County Mayo does not provide a functional mechanism to ensure alignment with National and European climate objectives.

As stated above, regional targets have been allocated to the Regional Assemblies under the First Revision to the NPF. Regional Assemblies are required to prepare a Regional Renewable Electricity Strategies for each Region that will specify how the region can meet their allocated target, including specifying targets for each of the local authorities in its functional area.

Specifically, Renewable Energy Objective REO 23 of the Mayo CDP aims to *"support and facilitate the achievement of the minimum renewable energy target of 600MW for County Mayo over the plan, and to review/revise this target to ensure consistency with any future renewable energy strategies for the Northern and Western Region."*

Although Mayo County Council have stated in Renewable Energy Strategy for County Mayo (July 2026) that Mayo has 'already exceeded its renewable energy target of 600 MW', it has failed to acknowledge that the lifetime of the plan runs from 2022 – 2028. It has also failed to recognize the revised renewable energy locations in the First Revision to the NPF, which outline a renewable energy goal of an additional 1,389MW in the Northern and Western Region by 2030.

Basing the updated RES on the premise that Mayo has reached its renewable energy targets as set out for the lifetime of the CDP, particularly given the lifetime of the CDP only runs for another two years, is premature and it is considered that this position will create misalignment with regional policy once a Regional Renewable Electricity Strategy has been created for this region. As such, it is considered that the updated Renewable Energy Strategy for County Mayo does not comply with ACP's Section 15 obligations in this regard.

In addition, the newly adopted Renewable Energy Strategy effectively sterilises large portions of County Mayo for the purposes of Wind Energy and by doing so, is not compatible with the RED III Directive whereby areas deemed to be "Open for Consideration" are not suitable as they could not be developed in compliance with residential setbacks provided for in existing Ministerial Guidelines.

The Supreme Court went on to say that, at a more individual level, it might also be that the position proposed was not one which particularly engaged with the values of preservation of areas of scenic or natural beauty which had led to the designation of the area as not available. The subject lands provide a clear example of this issue, where the zoning designation has changed significantly notwithstanding the absence of any material change in the site's physical characteristics, wind resource, accessibility, or environmental context.

The Supreme Court concluded that:

> *"At the same time demands of the climate emergency reflected in the most up to date climate action plan might tip the balance in such a case so that permission should be granted. In any of these cases, it can be argued that the duty imposed on the Commission by s. 15 should means that the Commission should exercise its power to grant permission notwithstanding that the development would be a material contravention of the development plan"*

It is submitted that the present case falls squarely within all three of the example cases described by the Supreme Court and as such, the duty imposed by section 15 means that the Commission should exercise its discretion under 37G(6) and grant permission.

5. NEED FOR THE DEVELOPMENT

This section of the report is being provided for the Commission's consideration as a reason for the approval of the Proposed Development. It will demonstrate that Ireland is way off track to meet climate targets and GHG emissions reductions targets by providing leading body assessments and key analysis on Ireland's progress in meeting climate targets.

It is structured to cover the following:

- Environmental Protection Agency's Ireland's Greenhouse Gas Emissions Projections 2025-2030 (May 2026)
- EirGrid Assessment of Renewable Electricity Deployment and System Requirements;
- Climate Change Advisory Council (CCAC) Assessment of National Climate Action Progress;
- National Onshore Wind Targets and State of Delivery; and
- Contribution of the Proposed Development to National and Regional Climate Objectives Contribution to Climate Action Targets

5.1 ENVIRONMENTAL PROTECTION AGENCY (EPA) ASSESSMENT OF PROGRESS ON CARBON BUDGET COMPLIANCE

The Environmental Protection Agency's most recent emissions projections report, *Ireland's Greenhouse Gas Emissions Projections 2025-2030*, published in May 2026, provides the latest assessment of Ireland's progress towards meeting its national emissions reduction commitments and legally binding carbon budgets[2]. The findings confirm that, despite progress in a number of sectors, Ireland remains significantly off-track to achieve its statutory target of reducing greenhouse gas emissions by 51% by 2030 relative to 2018 levels.

The EPA projects that, even under a scenario in which all planned policies and measures are fully implemented, national emissions would reduce by up to 25% by 2030, approximately half of the reduction required under existing legislation. The report further concludes that while Ireland may come close to complying with the First Carbon Budget (2021-2025), emissions during the Second Carbon Budget period (2026-2030) are projected to exceed the allowable limit by between 53 $MtCO_2eq$ and 82 $MtCO_2eq$. The EPA identifies substantial challenges across several sectors of the economy and notes that the implementation of decarbonisation

[2] Environmental Protection Agency (2026), *Ireland's Greenhouse Gas Emissions Projections 2025-2030*, EPA, May 2026. Available at: https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA-GHG-Projections-2025-2030-Web.pdf

measures must accelerate significantly if Ireland is to achieve either its carbon budgets or its EU obligations.

The report highlights the critical role of renewable energy deployment in reducing emissions from the electricity sector and facilitating decarbonisation across transport, heating and industry. The EPA concludes that stronger delivery of climate measures will be required over the remainder of this decade to close the gap between current projections and legally binding targets. These findings demonstrate a clear and continuing national need for additional renewable energy infrastructure capable of displacing fossil fuel generation and reducing overall greenhouse gas emissions.

5.2 EirGrid Assessment of Progress with Carbon Budget Compliance

EirGrid's assessments of the future electricity system similarly demonstrate the scale of infrastructure required if Ireland is to achieve its climate ambitions[3]. Through its *Shaping Our Electricity Future* programme, EirGrid has consistently identified the delivery of large volumes of additional renewable generation as an essential component of achieving Ireland's renewable electricity and emissions reduction targets[4].

EirGrid's analysis indicates that the transition to an electricity system supplied by at least 80% renewable electricity by 2030 will require significant additional onshore wind, offshore wind, solar generation, energy storage and grid reinforcement. The organisation has noted that electricity demand is expected to increase substantially over the coming years as transport, heating and industrial processes become increasingly electrified. As a consequence, Ireland must not only decarbonise existing electricity demand but must also provide renewable electricity for significant future growth in consumption.

The strategic position adopted by EirGrid is clear in that the expansion of indigenous renewable generation capacity remains essential to maintaining security of supply while simultaneously reducing greenhouse gas emissions. The proposed wind farm at Rooaunalaghta would contribute directly to these objectives through the provision of additional renewable electricity generation capacity in support of both national climate policy and electricity system requirements.

5.3 Climate Change Advisory Council (CCAC) Assessment

The Climate Change Advisory Council (CCAC), as Ireland's independent statutory body charged with advising Government on climate policy, has consistently highlighted the gap between current performance and the emissions reductions required under the Climate Action and Low

[3] EirGrid (2026), *System and Renewable Data Reports*. Available at: https://www.eirgrid.ie/grid/system-and-renewable-data-reports

[4] EirGrid and SONI (2023), *Shaping Our Electricity Future Roadmap Version 1.1*. Available at: https://www.eirgridgroup.com/site-files/library/EirGrid/Shaping-Our-Electricity-Future-Roadmap.pdf

Carbon Development Acts[5]. Recent CCAC reviews continue to emphasise that the pace of implementation across a number of sectors remains insufficient to place Ireland on a pathway consistent with its carbon budgets and climate neutrality objective.

The Council has repeatedly stated that carbon budgets represent the principal mechanism through which Ireland's climate obligations will be achieved and that failure to comply with any budget period increases the burden placed on subsequent periods[6]. The CCAC has also identified the rapid deployment of renewable electricity generation as a critical enabling measure which supports emissions reductions across the wider economy. Electrification of transport, buildings and industry is dependent upon the availability of increasing volumes of low-carbon electricity generation.

The conclusions reached by the CCAC are broadly consistent with those of the EPA in demonstrating that Ireland remains off track to achieve its climate commitments, and that substantial additional deployment of renewable energy infrastructure will be required throughout the remainder of this decade. The Council's findings therefore provide further support for the urgent delivery of new renewable energy projects capable of contributing to national decarbonisation objectives.

5.4 National Onshore Wind Targets – State of Play

The Climate Action Plan continues to identify onshore wind generation as one of the cornerstone technologies required to decarbonise Ireland's electricity sector and achieve the national target of at least 80% renewable electricity generation by 2030[7]. National policy continues to support the delivery of approximately 9 GW of installed onshore wind capacity by 2030[8].

While substantial progress has been made, recent Government and industry data indicate that Ireland had only recently surpassed 5 GW of installed onshore wind capacity by early 2026[9]. Although this represents a significant achievement and reflects strong growth within the sector over the past decade, it also highlights the scale of the challenge that remains. Approximately 4 GW of additional onshore wind capacity must still be delivered within a relatively short timeframe if the national target is to be achieved.

The delivery of this remaining capacity will require a sustained pipeline of projects progressing successfully through the planning, grid connection, financing and construction processes. It is

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[5] Climate Change Advisory Council (2025), *Annual Review 2025: Cross-Sectoral Review*. Available at: https://www.climatecouncil.ie/councilpublications/annualreviewandreport/

[6] Climate Change Advisory Council (2024), *Carbon Budget Proposal 2031-2040*. Available at: https://www.climatecouncil.ie/carbonbudgets/

[7] Department of Climate, Energy and the Environment (2025), *Climate Action Plan 2025*. Available at: https://www.gov.ie/en/publication/climate-action-plan-2025/

[8] Mak, F., McCann, J. and Ó hUilín, S. (2026), *Ireland Annual Report 2024*, IEA Wind TCP. Available at: https://iea-wind.org/wp-content/uploads/2026/02/Ireland.AnnualReport2024.Publish.pdf

[9] Department of Climate, Energy and the Environment (2026), *Ireland Reaches 8GW of Renewable Electricity Generation – Securing Our Future with Homegrown Renewables*, 12 March 2026. Available at: https://www.gov.ie/en/department-of-climate-energy-and-the-environment/press-releases/ireland-reaches-8gw-of-onshore-renewable-electricity-generation-securing-our-future-with-homegrown-renewables/

widely recognised that large-scale wind energy developments typically require a number of years to progress from planning approval to commercial operation. Consequently, projects entering the planning system during the current period will be among the developments most likely to contribute meaningfully towards national renewable energy targets before 2030.

Notwithstanding recent growth in renewable generation, the evidence demonstrates that Ireland remains materially short of its onshore wind capacity target and that a continued programme of wind farm development will be required if national climate and energy policy objectives are to be achieved.

5.5 Contribution to Climate Action Targets

The Proposed Development at Rooaunalaghta Co. Mayo would contribute directly to the delivery of Ireland's renewable energy, climate action and energy security objectives. The development would provide additional indigenous renewable electricity generation capacity at a time when all of the principal State bodies responsible for climate, energy and emissions policy continue to identify a substantial shortfall between current trajectories and legally binding targets.

Ireland's installed onshore wind capacity currently exceeds 5 GW, while the national objective remains approximately 9 GW by 2030. The Proposed Development would therefore contribute towards closing a remaining capacity gap of approximately 4 GW and would support the transition away from fossil fuel-based electricity generation.

In addition to contributing towards the achievement of renewable electricity targets, the development would assist in reducing greenhouse gas emissions, support compliance with carbon budgets and sectoral emissions ceilings, improve security of energy supply and provide additional renewable electricity required for the ongoing electrification of transport, heating and industry. The Proposed Development would therefore represent a positive contribution to local, regional and national climate action objectives and would help address a nationally recognised need for renewable energy infrastructure.

6. CONCLUSION

The proposed Rooaunalaghta Green Energy Project is a strategically important renewable energy project that will make a substantial contribution to Ireland's transition to a low-carbon energy system. The Proposed Development will generate significant quantities of renewable electricity, reduce reliance on imported fossil fuels, enhance national energy security and support the achievement of national and European climate objectives.

The Proposed Development has been informed by a robust site selection and iterative design process and is supported by comprehensive environmental and technical assessments. These assessments demonstrate that the project can be constructed and operated without giving rise to significant adverse environmental effects that would warrant refusal by An Coimisiún Pleanála, particularly having regard to the mitigation measures incorporated into the design of the development as evidenced in the Environmental Impact Assessment Report (EIAR) included as part of this planning application.

Although a portion of the site is identified as "Unsuitable" within the updated Mayo Renewable Energy Strategy, the significant change in zoning classification affecting the subject lands notwithstanding the absence of any material change in the underlying characteristics of the site is not determinative of the planning outcome and must be considered within the broader statutory and policy framework governing renewable energy development and in accordance with the Commission's section 15 climate obligations.

The proposal must be assessed having regard to all relevant material considerations, including national renewable energy policy, climate action commitments, energy security objectives, the characteristics of the receiving environment and the specific environmental assessments submitted with the application.

The development will deliver long-term environmental, economic and social benefits through the generation of clean electricity, support for national infrastructure and investment within the region. Specifically, the Proposed Development will also include a Community Benefit Fund which will directly benefit the area for years to come. The proposed Rooaunalaghta Green Energy Project therefore represents a sustainable form of development that accords with the overarching objectives of national planning policy, climate policy and renewable energy policy.

Accordingly, it is respectfully submitted that the Proposed Development is consistent with the proper planning and sustainable development of the area and that planning permission should be granted in accordance with the Commission's section 15 climate obligations.

Appendix A

LIST OF GRANTED APPLICATIONS SUBMITTED TO MAYO COUNTY COUNCIL AND GALWAY COUNTY COUNCIL ON THE SUBJECT SITE

PLANNING HISTORY SEARCH RESULTS - LARGE-SCALE / SIGNIFICANT DEVELOPMENTS WITHIN 10KM OF THE SUBJECT SITE

Appendix B

Submissions On Renewable Energy Strategy For County Mayo (July 2026)

WIND ENERGY IRELAND SUBMISSION ON RENEWABLE ENERGY STRATEGY FOR COUNTY MAYO

DCEE SUBMISSION ON RENEWABLE ENERGY STRATEGY FOR COUNTY MAYO

INISH ONSHORE SUBMISSION ON RENEWABLE ENERGY STRATEGY FOR COUNTY MAYO

GREENSOURCE SUBMISSION ON RENEWABLE ENERGY STRATEGY FOR COUNTY MAYO



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