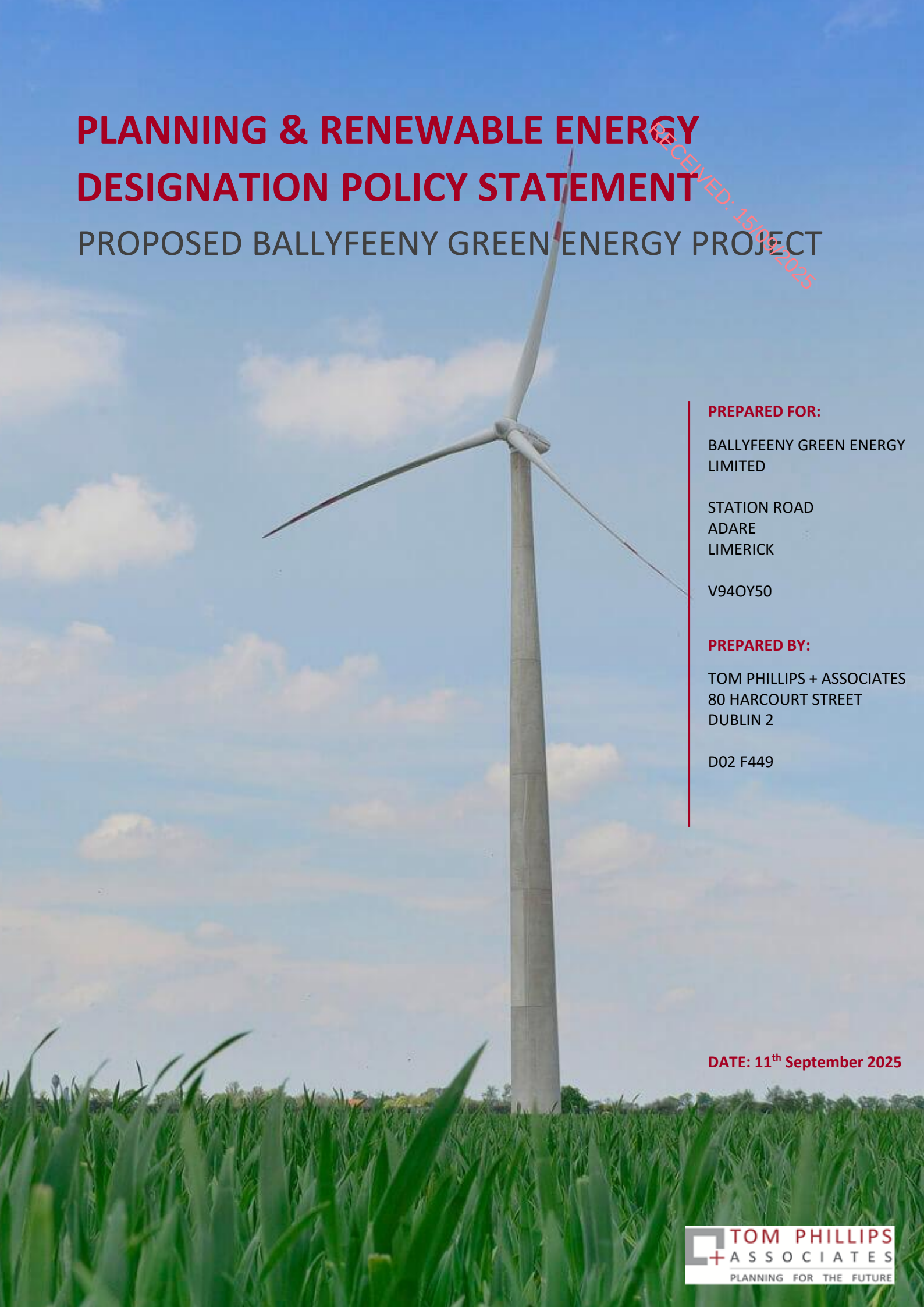
PLANNING & RENEWABLE ENERGY DESIGNATION POLICY STATEMENT

PROPOSED BALLYFEENY GREEN ENERGY PROJECT

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PREPARED FOR:

BALLYFEENY GREEN ENERGY LIMITED

STATION ROAD
ADARE
LIMERICK

V94OY50

PREPARED BY:

TOM PHILLIPS + ASSOCIATES
80 HARCOURT STREET
DUBLIN 2

D02 F449

DATE: 11th September 2025

TOM PHILLIPS + ASSOCIATES
PLANNING FOR THE FUTURE

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1.0 INTRODUCTION

1.1 Application Overview

Ballyfeeny Green Energy Limited (hereafter referred to as *'The Applicant'*), a subsidiary of *Greensource Sustainable Developments Limited* (*Greensource*[1]), has retained *Tom Phillips + Associates*[2], in association with a multi-disciplinary team, to prepare this Planning Statement proposing development consisting of the construction and operation of a wind farm and related works in the townlands of Tully and Ballyfeeny (also referred to as Ballyfeeney), County Roscommon. This Planning Statement also incorporates a Renewable Energy Designation Policy Statement, as indicated in Appendix 2 of Circular CEPP 1/2025.

As part of the proposed development, an underground grid connection will be installed mainly within the public road extending from a proposed on-site 38 kilovolts (kV) Substation at Ballyfeeny to where the R371 meets the Sliabh Bawn Substation Road in the townland of Tooreen, passing through the townlands of Pollymount, Bellanamullia, Scramoge, Treanaceeve and Ballyhubert, Co. Roscommon.

Certain details of the proposed development are unconfirmed in the planning application, and an opinion on unconfirmed details from Roscommon County Council pursuant to Section 32I of the *Planning and Development Act 2000 (as amended)* accompanies this planning application (Case Reference: DFR/25/1).

The proposed development will consist of:

- The construction and operation of a wind farm consisting of six wind turbines;

- The turbine specification is unconfirmed but will fall within the parameter range outlined by Roscommon County Council and will be one of the following three Options:
    - Technology Option 1: tip height of 160m, rotor diameter of 136m and hub height of 92m; or
    - Technology Option 2: tip height of 156m, rotor diameter of 133m and hub

[1] Station Road, Adare, Limerick, Limerick, V94OY50.
[2] No. 80 Harcourt Street, Dublin 2, D02 F449.

height of 90m; or

- Technology Option 3: tip height of 159m, rotor diameter of 138m and hub height of 90m.

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- Construction of Turbine Hardstands (including crane and assembly areas) and Turbine Foundations;

- Construction of approximately 3.9km of new permanent internal site access tracks and the upgrade of 0.5km of existing internal site access tracks;

- Construction of a permanent onsite 38kV electrical substation, including one single-story substation building with welfare facilities, Lidar, diesel generator and fuel storage tank, all associated electrical plant and equipment, all associated underground cabling, rainwater harvesting and storage tank, wastewater holding tank, security fencing, gates, signage, and all ancillary structures and works.

- Installation of underground electrical and communications cabling connecting the wind turbines to the proposed onsite 38kV substation;

- Construction of two temporary site compounds with associated site offices, welfare facilities, car parking, site fencing and lighting;

- Erection of a permanent 30m high communications relay tower;

- Construction access via six site entrances (SE1 – SE6) to include:

  - SE1 on the R371, SE2 and SE3 on the L6018, and SE4, SE5 and SE6 on the L60498;

  - SE1 and SE6 are temporary and will be reinstated following construction. SE1 will be re-established if required for turbine component repair or replacement. SE2 – SE5 will be retained permanently for operational access.

- Tree felling to facilitate the construction and operation of the proposed development;

- Installation of approximately 5.8km of permanent underground electrical cabling for the grid connection, including cabling within the public road corridor, extending from the proposed on-site 38kV Substation at Ballyfeeny to the junction of the R371 and the Sliabh Bawn Substation Road in the townland of Tooreen;

- All associated site works, including site clearance, landscaping, site drainage, security gates, fencing, permanent and temporary signage and biodiversity mitigation and enhancements, including hedgerow and treeline planting.

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The Applicant is seeking a 10-year planning permission and a 35-year operational life, commencing from the date of full commissioning of the entire wind farm. The development is covered by the provisions of the Renewable Energy Directive III (Directive 2023/2413) as transposed by the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (SI No. 274/2025) as amended (the "Renewable Energy Regulations"), and subject to Section 34D of the Planning and Development Act, 2000, as amended.

The site of the proposed development is located within the townlands of Tully, Ballyfeeny, Pollymount, Bellanamullia, Scramoge, Treanaceeve, Ballyhubert, Tooreen and Bunnageddy (also known as Runnageddy), c.4.5km northeast of Strokestown and 15km northwest of Longford town.

The development site measures c. 49.774 ha and is principally bounded by: a quarry, existing woodland and agricultural lands to the north, to the east and the south; and by existing residences and a quarry to the west.

Overall, it is considered that the development is in accordance with international, national, regional and local planning policy. The development's contribution to a maximum export capacity[3] (MEC) of between 25 and 29 MW annually, based on the current outputs of the turbine technology types to be constructed, will aid realisation of renewable energy targets while providing jobs, economic development and a community development fund which will result in positive socio-economic impacts on the region, in line with the objectives of the *Roscommon County Development Plan (2022-2028)* at a local level. The provision of between 25 and 29 MW MEC will also provide c.19% of the future potential renewable generation, as per targets set out in the *Roscommon County Council Renewable Energy Strategy,* which accompanies the Plan, as well as matching the average annual electricity demand of 29MW for County Roscommon. The development also meets relevant requirements at all policy levels concerning its construction, operation and eventual decommissioning, not leading to adverse effects upon the surrounding environment, including water quality, landscape, biodiversity or amenities.

[3] The maximum allowable power that can be exported by the windfarm to the grid

This Planning Statement considers the development in accordance with the principle of proper planning and sustainable development, having regard to Government, Regional and County-level planning policies and plans, including the *Roscommon County Development Plan (2022-2028)*, together with relevant statutory guidelines.

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This Planning Statement also contains a Renewable Energy Designation Policy Statement as required under the Circular letter CEPP 01/2025, which notified planning authorities, the Commission and other key stakeholders of the transposition of certain articles of the Renewable Energy Directive III into the planning code by means of the Renewable Energy Regulations.

1.2 Rationale for the Application

> *"In 2024, the world has again experienced record global temperatures. Climate extremes have become the norm for many regions, with impacts for human health, wellbeing, nature and biodiversity of grave concern. The concentrations of greenhouse gases (GHG) in the atmosphere have continued to increase, reaching new record levels. This reinforces the findings of the Intergovernmental Panel on Climate Change's (IPCC) Sixth Assessment Report and its message that accelerated action to address the causes and consequences of climate change is needed without delay.*
>
> *Ireland will continue to play its part within the international multilateral system, including through its roles in the EU, UN bodies, International Financial Institutions (IFIs), and the Organisation for Economic Cooperation and Development (OECD)." – Climate Action Plan (2025)*

The transition away from fossil fuels to renewable sources such as wind energy in order to achieve the decarbonisation of Ireland's national energy supply is a key objective of current national climate objectives in the form of the *Climate Action Plan (2025)* and all legally binding international climate commitments. However, Ireland is facing significant challenges in its efforts to meet agreed climate action targets and its commitment to transition to a low-carbon economy by 2050.

The provision of wind energy developments, such as the subject proposed wind farm, is strongly supported by international, national and regional policies aimed at achieving the transition to a low-carbon and climate-resilient economy, increasing renewable energy generation, and enhancing energy security. Specifically, the proposal will contribute to achieving the State's target of generating 9GW of electricity from onshore wind and reducing GHG emissions by 80% by 2030 as set out in the CAP25. Under the *Climate and Low Carbon Development (Amendment) Act 2021*, relevant bodies, including County Councils and *An Coimisiún Pleanála,* shall in so far as practicable, perform their functions in a manner consistent with several strategies and plans, including the most recent approved climate action plan [*Climate Action Plan (2025)]*.

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The provision of wind energy developments such as the proposed wind farm within Ballyfeeny is strongly supported by International, National and Regional policies aimed at achieving the transition to low-carbon and climate-resilient local and rural economies and enhancing energy security through increasing renewable energy generation.

While it is accepted that the proposed wind farm, if permitted, will make only a small contribution towards the national target of 9GW of onshore wind energy by 2030, at a local scale the development will provide a significant energy output roughly equating average annual electricity demand for Roscommon, will meet c.19% of the future potential renewable generation in the County reinforcing energy security, enabling the transition to renewable energy and aiding the Local Authority in its aims concerning transitioning to a greener future.

Further to this, the subject proposal will make a contribution towards onshore wind energy development targets for the *Northern and Western Region* as set out in the now approved *Revised National Planning Framework (April 2025)*, these targets being the targeted provision of an additional onshore wind energy capacity allocation of 1,389MW, and this region to provide a 35% of national share of onshore wind energy provision by 2030. The proposed project could account for up to c.2% of the wind energy targets for the region.

As it is a national aim that a significant portion of Ireland's renewable electricity will be generated by wind, achieving the wind energy target is crucial for the country to achieve 80% renewable electricity, in turn, reducing dependency on fossil fuels. Onshore wind energy is therefore of crucial importance to the decarbonisation of Irish society.

It is submitted that in order to achieve these aims, it is clear that suitable sites for wind farm development must be developed to cater for the energy needs of local communities where possible.

It is a consistent policy objective of the *Roscommon County Development Plan (2022 – 2028)* to encourage and to favourably consider proposals for renewable energy developments in order to meet national, regional and county renewable energy targets.

Further to this, the *Roscommon County Development Plan (2022 – 2028)* is clear in its support of the development of wind farms within locations specifically identified as most suitable for their development, as is the case with this subject proposal.

The *Climate Action Plan (2024)* estimated that an 8-times increase in renewable energy deployment to 2.3GW annually is required between 2024 and 2030 to reach climate and energy targets. In this context, it will take hundreds, if not thousands, of individual renewable energy projects, such as the proposed wind farm, to decarbonise the local economy.

The *Climate Action Plan (2025)*, like its predecessor, sets a target of 9GW onshore wind annual energy production by 2030, seeking renewable energy to deliver 80% of the total annual energy share. The Action Plan specifically notes that wind energy development will be critical to ensuring that the 80% renewable electricity target is reached.

Section No. 7 of this Statement further details the strategic importance of and need for the subject development with regard to an increased need for security of energy supply, enabling Ireland to reach its legally binding climate targets, reducing reliance on imported fossil fuel,

and the urgent need to replace the significant amount of wind farms set to be decommissioned in the coming decades.

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It is submitted that environmental effects have been assessed in the EIAR and NIS submitted, as well as various other forms of assessment submitted with this application, including the Construction Environmental Management Plan and Species and Habitat Management Plan.

Having regard to the key points set out in this Statement, it is respectfully requested that Roscommon County Council consider the relevant planning context that applies, and grant permission for the proposed wind farm which is the subject of this application.

1.3 Design Strategy Implemented

It is submitted that the project design team, under the direction of the Applicant, in conjunction with the project planning consultants (TPA), undertook a comprehensive assessment of both the site and planning policy at all levels, from national to regional, pertaining to the suitability of the subject site to be developed as a wind farm.

A number of iterations of site layouts were considered to arrive at the proposed arrangement of buildings, access and site infrastructure. Please see Chapter No. 3, EIAR Volume Two – *'Consideration of Alternatives'* – of the EIAR prepared by *Rowan Engineering Ltd* in association with *this Planning Report*, and submitted with the application, for details on each iteration prepared and considered.

The design strategy has also been influenced by both a formal Pre-Planning Meeting with Roscommon County Council, requested under *S247* of the *Planning and Development Act, 2000 (as amended),* and a formal opinion obtained from the Planning Authority in relation to the proposed design flexibility under *Section 32H and 32I* of the Planning *and Development Act, 2000 (as amended)* which is included with this application.

2.0 SITE LOCATION AND CONTEXT

2.1 Subject Site

The development site is located in County Roscommon within the Ballyfeeny and Tully townlands and measures approximately 49.774 ha.

The proposed wind farm is principally bounded by a quarry, existing woodland and existing agricultural lands to all sides, as well as by existing residences and a school to the west.

The subject proposed development site (inclusive of the Redline planning boundary), exclusive of roads included in the application, to enable the transport of the turbine components, comprises both open green fields and existing woodland.

The surrounding uses are chiefly agricultural, extractive industry and existing residences.

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Having due consideration to the Draft WEDG 2019 and in accordance with best industry practice, the proposed wind turbines have a setback distance of 4 times the tip height (640m) (which is 4 times the tallest tip height of the 3 turbine Technology Options), subject to a mandatory minimum setback of 500 metres. The 640m setback distance has been maintained for all sensitive receptors apart from sensitive receptor No. 35, located 599m from T02. This stakeholder has provided consent to the proposed siting of wind turbine(s) located within a distance of 4 times the tip height of any turbine, however, greater than 500 meters. A consent letter from the resident at Receptor Number No. 35 accompanies this Planning Application. Community receptor 30, Ballyfeeney National School, is situated c.779 metres northwest of T01. The second community receptor is a church, located c.1.97 km southwest of T01.

The two commercial receptors within the 2km are receptor 168, a recruitment agency located c. 1.87 km southwest of T01, and Receptor 159, a pub c. 1.95 km southwest of T01. The site of the proposed wind farm is currently accessed from R371 to the south and has proximate connections to the N5.

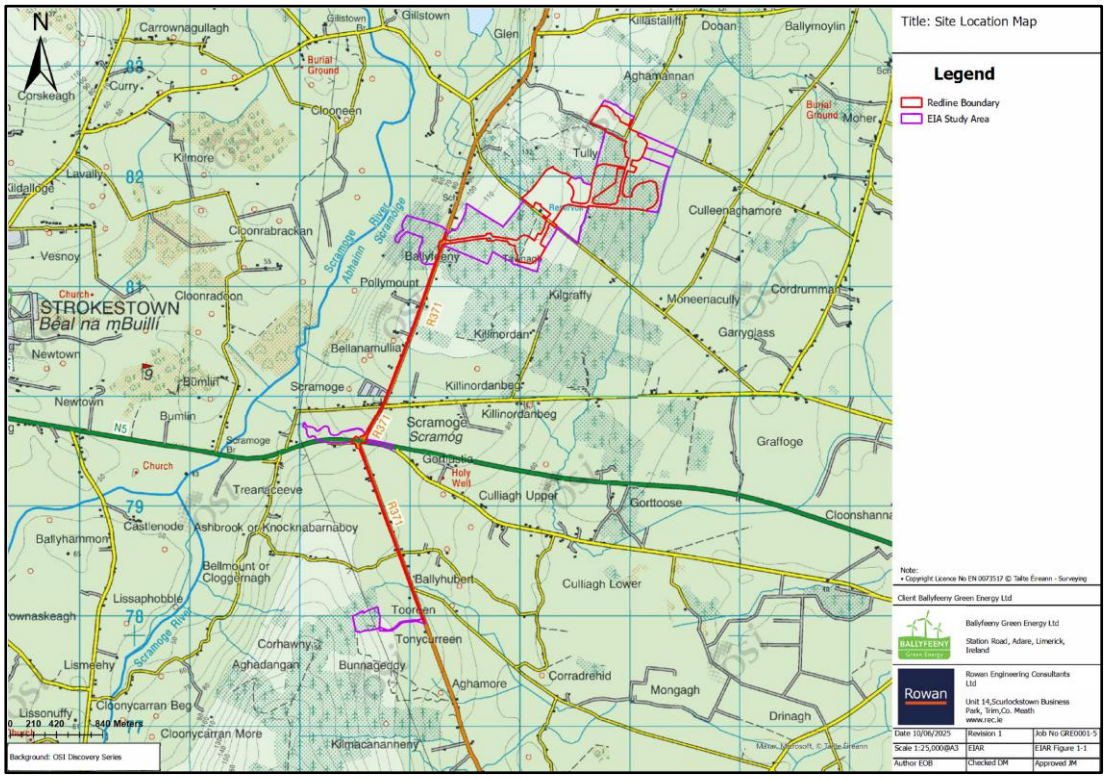


Figure 2.1: Site Location, with red line of proposed development works outlined (Source: Google Earth; annotated by Rowan Engineering Ltd. (June 2025)).

The proposed development site comprises the R371 Regional Road, its crossing with the N5 (subject to temporary road widening works to facilitate transport of wind turbine components), clearing of woodland and open green fields where the subject 6 No. proposed wind turbines will be situated, as well as other works described within the statutory notices submitted with the proposed development and as further detailed within this Report.

There are no protected structures on site, nor is the site located within an architectural conservation area, and it should be noted that the lands have, to date, not produced any

historical find currently registered within the Department of Heritage's *'Historic Environment Map Viewer'*[4] nor has Chapter No. 13 - Archaeology, Architectural & Cultural Heritage of Volume Two of the EIAR identified such.

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Further to this, as detailed within Chapter No. 11 of the accompanying EIAR – Landscape and Visual, the Landscape Visual Impact Assessment contained within said Chapter details a Zone of Theoretical Visibility of the subject proposal in order to assess potential visual effects.

The subject Chapter concludes with an identification of no scenic views or routes within Roscommon and Leitrim County (identified within Table 11.6) being affected by this proposal.

3.0 THE PROPOSAL

3.1 Introduction

The proposed development seeks permission for the development of a wind farm consisting of 6 No. wind turbines with a blade tip height of 156, 159 and 160 metres, depending on the wind turbine technology option selected (Technology Option 1, Technology Option 2 or Technology Option 3) and other works described within the following section of this Planning Statement.

The proposed development has been subject to a rigorous project constraints exercise as well as a pre-planning meeting with *Roscommon County Council*, as requested under *S247* of the *Planning and Development Act (2000) (As Amended).* This has informed the design parameters of the subject development, including scale, design and layout. A detailed description of the alternatives considered is provided within Chapter No. 3, Volume Two of the EIAR that accompanies the planning application.

The description below outlines the development and its main characteristics. This description should be read in tandem with the drawings and reports included with this application.

A 10-year planning permission and 35-year operational life from the date of commissioning of the entire wind farm is being sought. At the end of the 35-year operational life, the proposed wind farm will be decommissioned unless otherwise approved by the relevant local authority.

3.2 Summary Development Description and Particulars

The proposed development is described within statutory notices as follows:

Ballyfeeny Green Energy Limited intend to apply to Roscommon County Council for a ten-year planning permission for a renewable energy development at this site comprising the

[4] https://heritagedata.maps.arcgis.com/apps/webappviewer/index.html?id=0c9eb9575b544081b0d296436d8f60f8

construction and operation of a wind farm and related works in the townlands of Tully and Ballyfeeny (also referred to as Ballyfeeney), County Roscommon.

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A proposed underground grid connection will be installed mainly within the public road extending from a proposed on-site 38 kilovolt (kV) Substation at Ballyfeeny to where the R371 meets the Sliabh Bawn Substation Road in the townland of Tooreen, passing through the townlands of Pollymount, Bellanamullia, Scramoge, Treanaceeve, Ballyhubert, Co. Roscommon.

Certain details of the proposed development are unconfirmed in the planning application, and an opinion on unconfirmed details from Roscommon County Council pursuant to Section 32I of the Planning and Development Act 2000 (as amended) accompanies this planning application (Case Reference: DFR/25/1).

The proposed development will consist of:

- The construction and operation of a wind farm consisting of six wind turbines;
- The turbine specification is unconfirmed but will fall within the parameter range outlined by Roscommon County Council and will be one of the following three Options:
    - Technology Option 1: tip height of 160m, rotor diameter of 136m and hub height of 92m; or
    - Technology Option 2: tip height of 156m, rotor diameter of 133m and hub height of 90m; or
    - Technology Option 3: tip height of 159m, rotor diameter of 138m and hub height of 90m.
- Construction of turbine hardstands (including crane and assembly areas) and turbine foundations;
- Construction of approximately 3.9km of new permanent internal site access tracks and the upgrade of 0.5km of existing internal site access tracks;
- Construction of a permanent onsite 38kV electrical substation, including one single story substation building with welfare facilities, Lidar, diesel generator and fuel storage tank, all associated electrical plant and equipment, all associated underground cabling, rainwater harvesting and storage tank, wastewater holding tank, security fencing, gates, signage, and all ancillary structures and works;
- Installation of underground electrical and communications cabling connecting the wind turbines to the proposed onsite 38kV electrical substation;
- Construction, of two temporary site compounds with associated site offices, welfare facilities, car parking, site fencing and lighting;

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- Erection of a permanent 30m high communications relay tower;
- Construction access via six site entrances (SE1 – SE6) to include:
    - SE1 on the R371, SE2 and SE3 on the L6018, and SE4, SE5 and SE6 on the L60498;
    - SE1 and SE6 are temporary and will be reinstated following construction. SE1 may be re-established if required for turbine component repair or replacement. SE2 – SE5 will be retained permanently for operational access;
- Tree felling to facilitate the construction and operation of the proposed development;
- Installation of approximately 5.1km of permanent underground electrical cabling for the grid connection including cabling within the public road corridor, extending from the proposed onsite 38kV electrical substation at Ballyfeeny to end at the junction of the R371 and the Sliabh Bawn Substation Road in the townland of Tooreen;
- All associated site works, including site clearance, landscaping, site drainage, security gates, fencing, permanent and temporary signage and biodiversity mitigation and enhancements, including hedgerow and treeline planting.

The Applicant is seeking a 10-year planning permission and 35-year operational life, initiating from the date of full commissioning of the entire wind farm. The development is covered by the provisions of the Renewable Energy Directive III (Directive 2023/2413).

The planning application is subject to section 34D of the Planning and Development Act, 2000, as amended. When a notice issues in accordance with section 34D(b), the provisions of article 26A of the Planning and Development Regulations 2001 to 2025 shall apply.

This planning application is accompanied by an Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) which have been prepared in respect of the construction, operation and decommissioning of the proposed development, works to facilitate turbine delivery from the port of entry at the Port of Galway to the wind farm site entrance (SE1) at Ballyfeeny, via Lough Atalia Road, College Road, R339, R685, N6, M6, M18, M17, N17, N5 (New N5 Ballaghadereen to Scramoge Road Project) and the R371, and works for a future underground grid connection extending from the R371 along the Sliabh Bawn Substation Road to the existing Sliabh Bawn 110kV Substation in the townlands of Tooreen, Tonycurneen and Bunnageddy (also referred to as Runnageddy).

3.3 The Project is not SID

It is submitted that the subject application, upon review of the 7th Schedule of the Planning and Development Act (2000), as amended, does not constitute a Strategic Infrastructure Development for the following reasons:

- The proposed number of wind turbines and MW production is below the threshold.

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In relation to Section 182A, for the following reasons, the proposed development is below also considered below threshold as :

- The proposed development is below the kV substation threshold and is not part of the electrical transmission network.
- The proposed development does not create a new node on the grid[5].

4.0 PLANNING HISTORY

A full and complete planning history for the subject development site and wider area, conducted via online records contained within the Roscommon ePlan Portal, the An Comisiún Pleanála website (previously An Bord Pleanála), is provided in Appendix A. The review of the planning history does not reveal anything unusual in nature or anything which would potentially impact the current proposed development.

The subject search has been conducted on all records currently available to the public.

It is submitted that, within the last twelve months, there have been no proposals submitted for wind farm development of a comparable scale to the subject proposed development before Roscommon County Council.

5.0 PRE-APPLICATION ENGAGEMENT

5.1 Pre-Planning Meeting

A Pre-Planning Meeting was requested under *S247* of the *Planning and Development Act (2000) (as amended)* and was held with Roscommon County Council in relation to the proposed development concept (Pre-Planning Reference PL/657/25). This meeting occurred on the 27th February 2025 online via Microsoft Teams. The attendees were as follows:

Roscommon County Council Planning & Associated Departments:

- Alan O'Connell;
- John Freeman;

[5] It is noted that a future planning application will be required for minor upgrades to the existing 110kV Substation at Sliabh Bawn, these future works do not form part of this application for consent. Further, these works will not constitute SID pursuant to Sections 37A, 38B or 182A as they will not represent the transmission of electricity. This development, which will take place under public roads, will be undertaken by a statutory undertaker, having a right or interest to provide services in connection with the proposed project.

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- David Ryan;
- Ivor Kilcline.

On behalf of the Client:

- Tomás Lean – Greensource Sustainable Developments;
- Larry O'Halloran – Greensource Sustainable Developments;
- David Murphy – Greensource Sustainable Developments;
- James Massey – Rowan Engineering Consultants;
- Jessica Boyd – Rowan Engineering Consultants;
- Eimear O'Brien – Rowan Engineering Consultants;
- Barry McGinn – Mable Consulting Engineers;
- Brain Minogue – Tom Phillips + Associates.

The key points of discussion during the subject Pre-Planning Meeting were as follows:

- The principle of development of the subject site, as a wind farm, was considered to be appropriate by the Local Authority.
- The Local Authority noted that the subject proposed project is proposed within an area of a *'very high value'* landscape, and thus the submission of a *Visual Impact Assessment* against the subject development is crucial, for which guidance was given in relation to where certain views should be taken from.
- Specifically, the Local Authority also requested that adequate consideration be given to 2 No. scenic routes in particular – R371 shore of Kilglass lough and L6008 shore of Grange lough, within a Visual Impact Assessment.
- Concerning the question of shadow flicker, the Design Team confirmed that the subject proposal fully aligns with the provisions of the *Wind Energy Development Guidelines (2006),* as well as having due consideration of the *Revised Wind Energy Development Guidelines (2019),* in accordance with industry best practice, should they be enacted.
- It was also clarified during the meeting that no dwellings are situated within 500 meters of the proposed project and that all sensitive receptors within 2 kilometres of the proposed project have been identified and accounted for in any assessment about possible effects upon residential amenity.

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- It was confirmed that there is no peat onsite, with a *Slope Assessment and Stability Assessment* having been completed.

- The preferred turbine delivery route, utilising the N5, was received positively by the Local Authority, with it being noted by the Local Authority that Roscommon Co Co noted that the Part 8 Strokestown improvements are to be considered in a Turbine Delivery Route Assessment.

It is submitted that any environmental considerations raised during the Pre-Planning Meeting between Roscommon County Council and the Design Team have been fully addressed within the Environmental Impact Assessment Report prepared by *Rowan Engineering Consultants Ltd* and submitted with the accompanying documentation as part of this subject proposal.

5.2 Design Flexibility Consultation Meeting with Roscommon County Council

In accordance with *Section 32H and 32I* of *the Planning and Development Act 2000 (as amended)*, the Applicant formally requested an Opinion on Design Flexibility from the Local Authority on the 21st March in relation to certain design details as follows:

- Turbine total tip height (range of 156m – 160m);

- Turbine rotor diameter (range of 133m – 138m), and

- Turbine hub height (range of 90-92m).

A meeting was held between the Local Authority and Design Team members on behalf of the Client via Microsoft Teams on Monday, 12th May 2025 (meeting reference number: DFR/25/1).

<u>Roscommon County Council Planning & Associated Departments:</u>

- Alan O'Connell - Roscommon County Council;

- Mary Grier – Roscommon County Council;

<u>On behalf of the Client:</u>

- Tomás Lean – Greensource Sustainable Developments;

- David Murphy – Greensource Sustainable Developments;

- James Massey – Rowan Engineering Consultants;

- Jessica Boyd – Rowan Engineering Consultants;

- Barry McGinn – Mable Consulting Engineers;

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- Brain Minogue – Tom Phillips + Associates;
- Declan Foley – Tom Phillips + Associates.

Further to this meeting, an Opinion by Roscommon County Council was obtained, dated the 9th June 2025 (Case Reference DFR/25/1).

The subject Opinion on Design Flexibility from Roscommon County Council is submitted with this application.

5.3 Public Consultation

Public consultation for the project has been a key consideration of the *Design Team* from the inception stage.

In this regard, the accompanying Community Engagement Report submitted with this application illustrates how engagement with the occupiers of every dwelling within a 2km radius of the proposed wind farm site was made by community liaison representatives on behalf of the Applicant, with leaflets being dropped into each residence.

These leaflets included details relevant to the application and its effects on the locality, including the scope of the project and the establishment of a Community Benefit Fund.

Further to this, it is submitted that within the observation period for this subject application, the Client intends to hold a public engagement meeting within Ballyfeeny to further inform the community with regard to the particulars of the proposal.

As outlined within the Community Engagement Report, consultation between the Design Team and people living within proximity of the proposed project has provided the opportunity to receive advice, assistance and input from a wide range of stakeholders and has helped ensure that any potential concerns associated with the proposed project are considered and addressed where feasible, prior to the submission of a planning application.

For more details in regard to public consultation and participation relating to the subject proposal, please refer to the aforementioned Community Engagement Report prepared by the Design Team, as well as Section 1.11 (Scoping and Consultation) of Chapter No. 1, Volume Two of the accompanying EIAR.

5.4 Works within Public Domain

The works within the public domain submitted as part of this development are submitted to be the temporary widening of N5 and R371 and other localised works, such as widening and stoning of public road verges and roundabouts, and all other temporary works to facilitate the delivery of components of the development are required as part of this subject proposal.

A Letter of Consent has been issued by Roscommon concerning works to lands within their jurisdiction and is submitted with this subject application.

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This subject Letter, dated 14th May 2025, details that Roscommon County Council consents to the submission of this application for development, including lands under the control of the Planning Authority, in particular those lands registered under folios RN16423F, RN21956F, RN25792F, RN30882F and RN44742F.

It is also submitted that some of the works identified within the EIAR submitted with this application (which has assessed all works required to facilitate the project) may be subject to additional licensing requirements, which will be secured separately as required.

Any instances of development, which will take place under public roads, will be undertaken by a statutory undertaker having a right or interest to provide services in connection with the proposed project.

For further details, please refer to the accompanying Letter of Consent received from Roscommon County Council, as well as the Letter from Ballyfeeny Green Energy Limited confirming their intention to progress planning approval for such works identified within the EIAR submitted with this application[6], (which has assessed all works required to facilitate the project), are outside the jurisdiction of Roscommon County Council.

6.0 RENEWABLE ENERGY DESIGNATION POLICY STATEMENT, PLANNING POLICY & LEGISLATIVE CONTEXT

6.1 Introduction

This section outlines how the proposed development accords with the visions, objectives and development management standards of all relevant planning policy documentation which pertains to development of this nature at all levels, including national, regional and local.

As part of the Renewable Energy Directive III being transposed into Irish law by the Renewable Energy Regulations, it is expected that planning applications concerned with renewable energy development will include a Renewable Energy Designation Policy Statement, outlining why the project is designated as a renewable energy project and how the proposal accords with relevant qualifying criteria. The following section is a Renewable Energy Designation Policy Statement submitted with this application.

6.2 Renewable Energy Designation Policy Statement

In regard to assessing whether the development is considered a renewable energy development covered by the provisions of the Renewable Energy Directive III (Directive 2023/2413 it should be noted that S.I. No. 274 of 2025 (which transcribes the directive into

[6] S.4.4(1)(g)

law) introduces the following definitions of 'renewable energy' and 'renewable energy development':

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> *'renewable energy' means energy from a renewable non-fossil source, namely* ***wind energy****, solar energy (including solar thermal and solar photovoltaic energy), geothermal energy, osmotic energy, ambient energy, tide, wave and other ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas or biogas;*
> *'renewable energy development' means* ***development the purpose of which is to generate renewable energy from one or more than one renewable non-fossil resource****, and includes the building of renewable energy plants and any co-located energy storage, and any works necessary for the connection of such plants or storage to the grid, but does not include relevant solar energy development, small-scale solar energy equipment development and small-scale non-ground source heat pumps;*

In turn, it is submitted upon review of the project and its particulars, namely the provision of 6 No. wind turbines, of which the parameters are unconfirmed but will consist of 1 of 3 No. technology options, which will provide, based on current technology, an estimate of between 25 and 29 MW MEC, the subject proposal clearly meets the criteria which qualify it as a renewable energy development and should therefore be subject to the provisions of the Act introduced under S.I. No. 274 of 2025.

Specifically, the proposed development would qualify under the category of *'renewable energy development with capacity of 150kW or more'*. In regard to such development, the following provisions apply:

> *"(1) Subject to subsection (3), where an application for permission for renewable energy development with an electrical capacity of 150kW or more is made to a planning authority, and the period for making a decision under section 34(8) would expire after the expiry of the period of 52 weeks from the date of the notice referred to in section 34D(a), the planning authority shall make its decision on the application before the expiry of that period of 52 weeks.*
>
> *(2) Subject to subsection (3), the period for making a decision in relation to an application referred to in subsection (1) shall not be extended under section 34(9) by more than 52 weeks from the date of the notice referred to in section 34D(a).*
>
> *(3) Where the planning authority considers that permission should nevertheless be given for the development for imperative reasons of overriding public interest in accordance with section 177AA, the planning authority shall make its decision on the application before the expiry of 2 years from the date of the notice referred to in section 34D(a)".*

The appropriateness of the subject proposal being designated as a renewable energy development, for which these new provisions of the Act are applicable, has also been informed by the subject proposal submitted, including all relevant documentation,

information or plans and drawings where prescribed under the legislation, including the submission of an Environmental Impact Assessment Report and a Natura Impact Statement.

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Further to this, we submit within this Renewable Energy Designation Policy Statement that there is clear justification for the proposed development from a policy context perspective at all levels, from national to local. Policy relevant to the proposal at the international level is further detailed within Chapter No. 4 of Volume Two of the accompanying EIAR.

For the benefit of the Local Authority, we have attached a completed Renewable Energy Directive III – Completeness Check, extracted from the subject Circular (2025 CEPP 1/2025), which details compliance with the details set out by the requirements for development proposals of this nature, within Appendix D of this Report.

National Level

At national level, as detailed within the following sections of this Report, the subject proposal aligns with the key objectives of both the *National Planning Framework (2018)* and its revision published in 2025, which aim for the decarbonisation of the electricity grid in order for Ireland to transition to a net zero economy, through the provision of renewable energy at designated appropriate locations.

As detailed in the sections below, the subject proposal will aid the realisation of legally binding climate targets contained within the Revised National Planning Framework (2025), in regard to onshore wind energy provision within the Northern and Western Region.

The proposal also aligns with the aims of the 2024 and 2025 Climate Action Plans in reducing reliance upon fossil fuel energy sources through the provision of renewable energy resources.

Regional Level

The subject proposal accords with all relevant provisions of the *Regional Spatial and Economic Strategy (2020-2032)*, most notably RPO 4.17 and 4.18, which seek to support the renewable energy developments within the region.

Local level

It is submitted that the subject proposal accords with strategic key aims of the current *Roscommon County Development Plan (2022-2028)*, which support renewable energy projects in rural areas, subject to ensuring the protection of elements such as landscape and residential amenity.

The subject proposals also align with all Climate Action, Energy, and Environment Objectives contained within the subject Development Plan. Further to this, the subject proposals accord

with the approach to wind energy development advocated by the Roscommon Renewable Energy Strategy, in locating the proposal within an area that is designated as "most favoured" to development of this nature.

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Compliance with relevant policy at all levels is explained in further detail within the following sections of this Report.

6.3 National Planning Framework (2018)

The Government published the *National Planning Framework (NPF)* on 16th February 2018. It is a national-level planning policy document that is designed to guide strategic planning and development for the next 20 years. Among its aims is the promotion of compact and sustainable growth, and providing support in areas of enterprise, innovation, and skills to ensure a strong and robust national economy. The NPF is informed by relevant climate legislation and EU policy including the *Climate Action and Low Carbon Development Act 2015* (as amended) which brought the applicable EU and international policies and law into the Irish context and so directs the development of Ireland's long-term climate action strategies, plans, national frameworks for climate change adaptation, and carbon budgets to adhere to EU targets.

A number of the key objectives throughout the National Planning Framework are to support the transition to a competitive, low-carbon, climate-resilient and environmentally sustainable economy by 2050.

A number of the National Strategic Outcomes and Policy Objectives refer to the sustainable development of the rural economy. These include, *inter alia*:

National Policy Objective 21:

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

National Policy Objective 52:

> *"****The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation*** *and the sustainable management of our natural capital".*

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National Policy Objective 55:

> ***"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".***

National Policy Objective 72:

> ***"Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development".***

The aims and objectives of the *NPF* are clear in their focus on the importance of fostering sustainable rural development in a manner that also aligns Ireland with its key fundamental goals in relation to the reduction in carbon emission levels nationally.

Furthermore, the *NPF* stresses the need for the decarbonisation of the electricity grid in order for Ireland to transition to a net-zero economy.

In that regard, the development proposed will align, with clear consistency, with the relevant Policy Objectives concerning development of this nature and within this setting.

The subject proposal is situated within an area identified by Roscommon County Council as *'Most Favoured'* for development of this nature, aligning with the objective of the provision of renewable energy use and generation at appropriate locations within the built and natural environment in order to contribute to achieving a low carbon economy by 2050.

Further to this, the subject proposal will provide 25 to 29MW in power per annum to the surrounding region, aiding the development of the local economy and area via the provision of energy through renewable means rather than traditional reliance upon fossil fuels.

6.4 Revised National Planning Framework (April 2025)

The First Revision to the National Planning Framework, having been approved by both Houses of the Oireachtas on the 8th April 2025, contains more enhanced policy support for renewable energy development, including, in particular, the introduction of regional renewable electricity capacity allocations for wind energy in order to achieve national targets set out in the *Climate Action Plan* adopted in 2024.

Under the Climate Action and Low Carbon Amendment Act 2021, the Climate Action Plan has legal standing with Section 14(B)(3) of the Act, noting that any local authority climate action plan shall, insofar as practicable, be consistent with the most recent approved climate action plan and national adaptation framework.

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National Strategic Outcome 8 states that, in line with the *Climate Action Plan (2024)*, it is a national objective to deliver 80% of our electricity needs from renewable sources by 2030.

The following *National Policy Objectives* are of keen relevance to the proposed project, in consideration of its nature and its importance:

National Policy Objective 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 as expressed in the most recently adopted carbon budgets".*

National Policy Objective 70:

> *"**Promote renewable energy use and generation at appropriate locations within the built and natural environment** to meet national objectives towards achieving a zero-carbon economy by 2050".*

National Policy Objective 75:

> ***"Local Authorities shall plan for the delivery of Target Power Capacity (MW) allocations consistent with the relevant Regional Spatial and Economic Strategy, through their City and County Development Plans".***

National Policy Objective 74:

> ***"Each Regional Assembly must plan, through their Regional Spatial and Economic Strategy, for the delivery of the regional renewable electricity capacity allocations indicated for onshore wind** and solar reflected in Table 9.1 below, and identify allocations for each of the local authorities, based on the best available scientific evidence and in accordance with legislative requirements, in order to meet the overall national target".*

Further to *National Policy Objective 74*, Table 9.1 of the *Revised Guidelines* notes specifically with regard to the on shore wind energy development, that the *Northern and Western Region*, the region in which the proposed project is situated, had an energised capacity of 1,761MW of onshore wind in 2023, and has an additional capacity allocation of 1,389MW, with a 35% of national share of onshore wind energy provision by 2030 targeted for this region.

In summary, Table 9.1 illustrates, if Ireland is to adhere to legally binding climate targets, then the Northern and Western Region will have to see a significant increase in renewable energy provision, including that of wind.

Table 9.1 | Regional Renewable Electricity Capacity Allocations

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**	

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Figure 6.4.1: Extract from Revised National Planning Framework (2025).

The proposed project, it is submitted, further aligns with the Revised *National Planning Framework* compared to its predecessor, as the revision introduces increased support for further provision of onshore wind energy development within identified appropriate locations.

The subject development is fundamentally most compatible with the overarching vision of the revision, with regard to the key aim of renewable energy use and generation at appropriate locations within the built and natural environment to meet national climate objectives and aid the realisation of a net-zero carbon emission future.

The proposal also represents a contribution toward Target Power Capacity (MW) allocations of *Roscommon County Council* as well as the *Northern and Western Region*, aiding the realisation of the 35% national share in onshore wind energy production by 2030 objective.

6.5 Climate Action Plan 2024 (CAP 2024)

Approved in December 2023, the *Climate Action Plan (2024)* sets out a plan designed to deliver a 51% national reduction in greenhouse gas (GHG) emissions by 2030 and for Ireland to reach a net zero emission state no later than 2050.

The *Climate Action Plan (2024*) therefore deploys a roadmap of actions which will support Ireland in meeting national climate objectives of pursuing and achieving, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy.

Section 12.3 outlines the projections for the energy sector. The *CAP 2024* clearly outlines the need to accelerate the deployment of renewable energy:

> *"Given that the programme of large-scale offshore wind deployment is expected to be realised towards the end of the decade, deployment rates for onshore renewables will need to increase to match demand growth to ensure we keep electricity emissions within range of the carbon budgets.* ***This requires a major upscaling and accelerating in the current deployment of renewables, particularly onshore wind. As an example, the historical average deployment of onshore wind installed capacity connected between 2008 and 2020 inclusive was ~280 MW per annum from 19 projects (with an annual maximum of 612 MW). To achieve the necessary emissions abatement,***

an approximately eight-times increase of renewable energy deployment to 2.3 GW annually would be needed between 2024 and 2030".

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The *CAP 2024* outlines six vital high-impact sectors to achieve these aims, with one such sector being noted as *the "Renewable Electricity Share"* and so targets for 80% of electricity generated from renewables by 2030, with an onshore wind target of 9GW in order to promote this target.

The subject proposal aligns fully with the vision of the *Climate Action Plan (2024)*, with the subject development representing the development of renewable energy provision, within an identified appropriate location, in order to supply energy to communities within this region of rural Ireland, thus reducing reliance upon fossil fuel energy sources which the *Climate Action Plan (2024)* seeks to phase out.

The increase in generation capacity to the national electricity grid from the proposed project supports the shift from Ireland's reliance on fossil fuels, whilst also leveraging the natural resources of the surrounding local rural economy and aids the transition towards a low-carbon economy.

6.6 Climate Action Plan 2025 (CAP 2025)

Published on the 15th April 2025, the *Climate Action Plan 2025 (CAP25)* is the third statutory annual update to Ireland's Climate Action Plan under the Climate Action and Low Carbon Development (Amendment) Act 2021.

The *Climate Action Plan 2025* builds upon previous Climate Action Plans by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings. It should be read in conjunction with Climate Action Plan 2024. The Plan provides a roadmap for taking decisive action to halve Ireland's emissions by 2030 and achieve climate neutrality by no later than 2050.

Section No. 11 of the Plan sets out the national carbon budget and emission reduction targets. Akin to its predecessor, *CAP 2024*, the Plan outlines six vital high-impact sectors to achieve these aims, with one such sector being noted as *the "Renewable Electricity Share"* and so targets for 80% of electricity generated from renewables by 2030, with an onshore wind target of 9GW in order to promote this target.

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%

Figure 6.6.1: Extract from the Climate Action Plan (2025).

The subject proposal aligns fully with the vision of the *Climate Action Plan (2025)*, as it did with its predecessor, with the subject development representing the development of renewable energy provision, within an identified appropriate location, in order to supply energy to communities within this region of rural Ireland, thus reducing reliance upon fossil fuel energy sources which the *Climate Action Plan (2024)* seeks to phase out.

The increase in generation capacity to the national electricity grid from the proposed project supports Ireland's aims.

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6.7 Regional Spatial and Economic Strategy (2020-2032)

This Strategy, published in 2020, was developed by the *Northern and Western Regional Assembly* and covers 8 no. counties, including County Roscommon. The Strategy describes itself within its introductory section as:

> "A *high-level development framework for the Northern and Western Region that supports the implementation of the National Planning Framework (NPF) and the relevant economic policies and objectives of the Government. It provides a 12-year strategy to deliver the transformational change that is necessary to achieve the objectives and vision of the Assembly*."

The Strategy specifically addresses renewable energy provision within the region within the following Regional Policy Objectives:

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 encouraging 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*

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RPO 4.18:

> *"**Support the development of secure, reliable, and safe supplies of renewable energy**, to maximise their value, maintain the inward investment, support indigenous industry, and create jobs".*

The proposed project is in line with the aims of the RSES relating to the development of renewable energy projects and the decarbonisation of the National Grid.

6.8 Roscommon County Development Plan (2022-2028)

At the county and local level, the lands are governed by the *Roscommon County Development Plan (2022-2028)*. The subject Development Plan sets out policies and strategies to develop the economic, social and cultural life of Roscommon County in a sustainable manner, aligning with regional, national and international objectives concerning sustainability.

Chapter No. 1 of the Development Plan sets the following strategic Aims of relevance to the subject application:

Strategic Aim 1:

> *"Achieve a transition to a competitive, greener, low carbon, climate resilient and environmentally sustainable county, facilitated through reducing the need to travel, by integrating land use and sustainable modes of transport, by reducing the use of non-renewable resources and **by promoting and facilitating renewable energy initiatives on a domestic and commercial scale**".*

Strategic Aim 14:

> *"To protect, conserve and enhance the built and natural heritage and the landscape of County Roscommon for future generations; and reinforce the distinctive character of the county through ensuring that recognised sites and species of environmental importance are conserved and managed appropriately".*

Chapter No. 5 of the Development Plan addresses rural development within Roscommon, with the following points being of relevance to the subject application:

Regional Development Objective 5.3 notes:

> *"Support and encourage farm-based renewable energy technologies as a means of improving the shift toward a low-carbon and climate resilient economy in the agriculture, food and forestry sectors".*

Further to this, it is stated within the Chapter that:

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> *"The Council will* ***support renewable energy projects in rural areas, subject to ensuring the protection of landscape sensitivities, residential amenity, views or prospects, public rights of way, wildlife, habitats, special areas of conservation, protected structures, bird migration paths,*** *etc."*

Chapter No.6 of the Development Plan, which deals with the economic development of the County, with Section 6.6 specifically dealing with the *'Just Transition Fund'*:

> *"The concept of 'Just Transition' is an economy-wide process that produces the plans, policies and investments that lead to environmentally and socially sustainable jobs, sectors and economies".*

Climate action is recognised as vitally important to help reduce the economic, environmental and social impacts of climate change across communities within the current Development Plan, with Chapter No. 8, entitled '*Climate Action, Energy and Environment'*, promoting a clear vision of the sustainable development of rural communities as well as for the management and development of the county's natural resources, in providing employment opportunities.

The Chapter acknowledges the importance of renewable energy and its potential to contribute to the reduction in fossil fuel dependency and greenhouse gas emissions. A plethora of Climate Action, Energy and Environment Objectives contained within the Development plan underpin a commitment to a transition to more renewable-based forms of energy at a local community level, including the following aims of Roscommon County Council:

CAEE 8.3:

> *"****Support developments and actions that assist in achieving the national targets for energy from renewable energy****, from renewable resources and reducing greenhouse gas emissions associated with energy production".*

CAEE 8.4:

> *"****Encourage and facilitate the various forms of renewable energy development detailed in the Renewable Energy Strategy that accompanies this Plan*** *(as well as any other new forms of renewable energy which may be developed during the lifetime of this Plan), subject to satisfying the principles of proper planning and sustainable development".*

CAEE 8.6:

> *"Facilitate proposals for energy storage systems and infrastructure, which support energy efficiency and reusable energy systems, provided such proposals accord with the principles of proper planning and sustainable development of the area".*

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CAEE 8.7:

*"**Ensure that proposals for renewable energy developments are considered in the context of relevant EU and national legislation**, including in respect of environmental protection. No renewable energy developments will be considered in designated Natura 2000 sites or their surrounding buffer areas".*

CAEE 8.8:

*"**Ensure that renewable energy developments do not undermine the preservation and conservation of the natural and built environment** and that an appropriate balance is achieved between renewable energy development and preservation of the natural environment".*

CAEE 8.9:

"Work in collaboration with EirGrid and other service providers and statutory bodies to facilitate a modern electricity network within the county, including the 'North Connacht Project,' in line with recognised best practice. The Council will require comprehensive studies to be undertaken for all technical and environmental considerations, to inform the assessment of proposed transmission routes".

CAEE 8.10:

"Support the development of facilities within the county dedicated to the exploration and advancement of renewable energy technologies, recognising that such facilities could assist in expanding public awareness of the sustainable benefits of renewable energy, provide training, research and development facilities for renewable energy".

CAEE 8.11:

"*Encourage and facilitate research and development proposals for renewable energies in accordance with the principles of proper planning and sustainable development".*

CAEE 8.12:

"Facilitate renewable energy proposals that bring about a direct socio-economic benefit to the local community".

CAEE 8.13*:*

"Promote the continued growth of the Sustainable Energy Community network by collaborating with SEAI and local communities to increase the number of Sustainable Energy Communities (SECs) in County Roscommon to at least 50 by 2030".

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Further to this, the following objective contained within this Chapter illustrates support of renewable development, including that of wind energy:

CAEE 8.5:

> ***"Facilitate wind energy developments primarily in areas designated in the Renewable Energy Strategy as "Most Favoured"*** *and secondarily in areas designated as "Less Favoured" in the Renewable Energy Strategy, subject to normal planning criteria and having regard to the Wind Energy Guidelines (DECLG, 2006) and any update to the Guidelines that may issue during the lifetime of this Plan. This will include consideration of carbon benefit analysis, as appropriate".*

Chapter No. 10 of the Development is entitled *'Natural Heritage'*, detailing the following *National Heritage Policy Objectives* of relevance to the subject proposal:

NH 10.1:

> *"Ensure the protection, conservation and enhancement of the biodiversity of the county".*

NH 10.4:

> *"Proposals where woodland, tree or hedgerow removal is proposed will be required to demonstrate a sufficient level of protection to Annexe IV species, such as Bats and Otter, in accordance with the Habitats Directive".*

NH 10.6:

> *"Require all new developments in the early pre-planning stage of the planning process to identify, protect and enhance ecological features by making provision for local biodiversity (e.g. through provision of swift boxes, bat roost sites, green roofs, etc.), having regard to the recommendations outlined in the Habitat Mapping in Co. Roscommon, 2011 and the County Roscommon Swift Survey".*

NH 10.7:

> *"Implement Article 6(3) and, where necessary, Article 6(4) of the Habitats Directive and to ensure that Appropriate Assessment is carried out in relation to works, plans and projects likely to impact on European sites (SACs and SPAs), whether directly or indirectly or in combination with any other plan(s) or project(s). All assessments must be in compliance with the European Communities (Birds and Natural Habitats) Regulations 2011.*

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NH 10.8:

> *"**Ensure that no plans, programmes, etc. or projects are permitted that give rise to significant cumulative, direct, indirect or secondary impacts on the integrity of European Sites** arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects, (either individually or in combination with other plans, programmes, etc. or projects)".*

NH 10.9:

> *"Ensure that any plan or project that could have a significant adverse impact (either alone or in combination with other plans and projects) upon the conservation objectives of any Natura 2000 Site or would result in the deterioration of any habitat or any species reliant on that habitat will not be permitted unless in exceptional circumstances".*

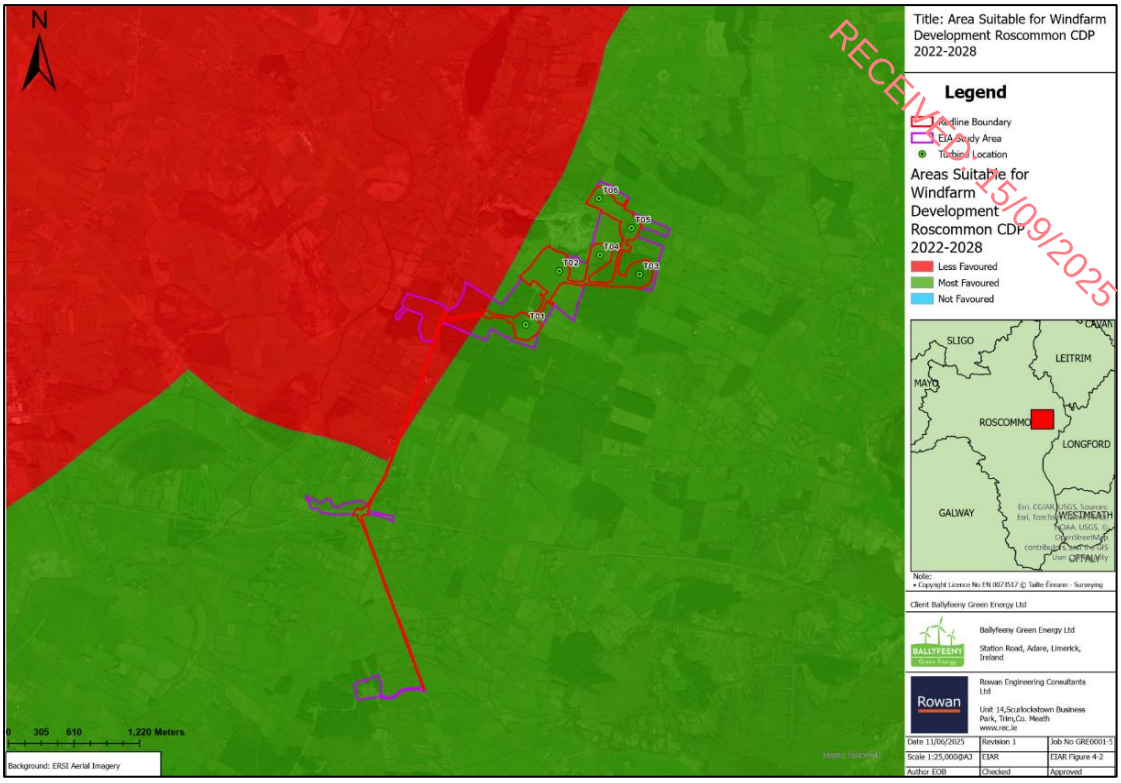
NH 10.25:

> *"**Minimise visual impacts on areas categorised within the County Roscommon Landscape Character Assessment, including "moderate value"," high value", "very high value"** and with special emphasis on areas classified as "exceptional value" and where deemed necessary, **require the use of Visual Impact Assessment** where proposed development may have a significant effect on such designated areas."*

In compliance with all Natural Heritage Policy Objectives contained within the Development Plan, as well as international law, both an NIS and EIAR have been prepared and submitted in order to both to identify, predict, and evaluate the potential environmental impacts of the Proposal, describe how to reduce these effects, provide this information to authorities to aid in their decision-making for the project, and to assess the potential effects of a proposed plan or project on protected European sites, known as Natura 2000 sites, in light of their conservation objectives.

The clear approach adopted by Council concerning the identification of areas with wind energy potential, as noted in CAEE 8.5**,** is based on the differing potential of its defined *Landscape Character Assessment (LCA)* areas to accommodate wind turbines and/or wind farms, subject to consideration of normal planning issues and environmental and landscape sensitivities.

It is submitted that the proposed wind farm Site, while being located within an area of "*Very High Value"* concerning its landscape, is also identified as per the current Development Plan and associated *Renewable Energy Strategy*, as being located within an area *"Most Favoured"* for the development of wind energy renewable development.



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Figure 6.8.1: Map created with extracts from Roscommon Renewable Energy Strategy (created by Rohan Engineering, 2025).

6.9 Roscommon Renewable Energy Strategy

An accompanying document to the subject *Roscommon County Development Plan (2022-2028)*, the Roscommon Renewable Energy Strategy aims to, along with the County Development Plan, set out an overall strategy and vision for the proper planning and sustainable development of the county in regard to renewable energy development.

Wind energy is recognised within the Strategy consistently as a key source of renewable development sought within Roscommon subject to compliance with local policy.

Renewable Energy Strategy Aim 3 notes the following with regard to wind energy development in Roscommon:

> *"Encourage and facilitate the various forms of renewable energy development explored in this Strategy, provided they are in accordance with the principles of proper planning and sustainable development.* ***Wind energy developments will be permitted in areas designated as "Most Favoured" primarily, subject to normal planning practices****.*

Further to this, Section 6.5 of the Strategy, entitled *'Wind Energy',* puts forward that:

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> *"Having regard to the geographical location and the nature of the underlying geology of Roscommon, it is recognised that* ***wind energy development currently offers one of the most viable vehicles for renewable energy production in the county****."*

Concerning the suitability of locations for wind energy development, Section 6.5 states the following:

> *"Following an intensive sieve analysis process and consideration of the landscape of County Roscommon, areas within the county have been designated as being 'Most Favoured', 'Less Favoured', and 'Not Favoured' for wind energy development potential. In this approach, constraints and resources were identified, and areas suitable for wind energy development were identified based on the presence or absence of these****. This approach enables a structured and consistent identification of viable wind energy resources and ensures the protection of the environmental and landscape assets of the county from inappropriate development****."*

6.10 Archaeology

Chapter No. 9 of Volume One of the *Roscommon County Development Plan (2022-2028)* outlines the policy objectives relating to built heritage, including the protection of architectural and archaeological heritage features, structures, and areas of special interest such as Architectural Conservation Areas (ACAs). They include the following:

BH9.1:

> *"****Ensure the protection of the architectural heritage of County Roscommon through the compilation*** *of a Record of Protected Structures, the designation of Architectural Conservation Areas, the safeguarding of historic gardens,* ***and the recognition of structures and elements that contribute positively to the vernacular and industrial heritage of the county****".*

BH9.13:

> *"****Secure the preservation*** *(i.e., preservation in situ or, as a minimum, preservation by record) of all archaeological monuments included in the Record of Monuments and Places as established under Section 12 of the National Monuments (Amendment) Act, 1994,* ***and of sites, features, and objects of archaeological interest generally****. In securing such preservation, Roscommon County Council will have regard to the advice and recommendations of the National Monuments Section of the Department of Housing, Local Government and Heritage".*

Ensuring the protection of local heritage features has been a key consideration of the proposed project from its outset, with Icon Archaeology providing the essential specialist input in this

regard, ensuring that the subject proposed project is compliant with BH 9.1 and BH 9.13 in regard to mitigation by monitoring, preservation by record in the event of finds, etc.

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For further details, please refer to Chapter No. 13, Volume Two of the EIAR submitted this subject application, which addresses all likely direct and indirect effects on archaeology, architectural and cultural heritage during the construction, operational and decommissioning phases of the proposed project.

It is concluded that the subject proposal fully aligns with the provisions of the *Roscommon County Development Plan (2022-2028)* and its *Renewable Energy Strategy* concerning policy relevant to the subject development in question.

The clear approach adopted by Council concerning the identification of areas with wind energy potential, as noted in CAEE 8.5, is based on the differing potential of its defined *Landscape Character Assessment (LCA)* areas to accommodate wind turbines and/or wind farms, subject to consideration of normal planning issues and environmental and landscape sensitivities.

It is submitted that the proposed wind farm Site, while being located within an area of "*Very High Value"* concerning its landscape, is also identified as per the current *Development Plan* and associated *Renewable Energy Strategy*, as being located within an area *"Most Favoured"* with regard to the development of wind energy production.

Upon overview of publicly available datasets (which are contained within Appendix B and C of this Statement with regard to landscape value and wind energy development production suitability, it is quite common that areas of *"High Value"* landscape and areas *"Most Favoured"* for wind energy production to overlay each other as detailed within Chapter No. 11 of Volume Two of the EIAR submitted with this subject application. In turn, and with regard to varying assessments and mitigation measures proposed, it is submitted that the subject application will not adversely affect the value of the landscape.

As the accompanying EIAR details, the proposal will not have any adverse effect on human health or the environment, nor any designated site of national and European significance and aligns with all objectives of the Development Plan pertaining to climate change, biodiversity, landscape and the environment.

The accompanying *Landscape Visual Impact Assessment* also illustrates that the subject proposal will not have an unacceptable negative detrimental impact upon the natural heritage and landscape of the area, nor any scenic route or view, and so satisfies provisions of the Development Plan concerning matters of visual impact, scale and siting.

The subject proposal will contribute towards identified energy targets while providing jobs, economic development and the community development fund would result in positive socio-economic impacts on the region, in line with the objectives of the *Roscommon County Development Plan (2022-2028)*.

By utilising the newest and best turbine technology, the *Development* supports the growth of new and emerging renewable technologies in line with policy at all levels, aiding the transition away from fossil fuels to a renewable-based national energy infrastructure.

The subject proposal is clear in its alignment with *Development Plan* requirements, it is in line with industry best practice, and suitable community engagement has formed a key part of the design and planning phase of the development.

It is therefore considered to be fully in compliance with the objectives and policies set out in the *Roscommon County Development Plan (2022-2028)* and its *Renewable Energy Strategy*.

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7.0 PLANNING CONSIDERATIONS

Following the above-referenced review of the subject site, the development proposal and the policy context, it is considered that the suitability of the proposed project can be distilled broadly into the following planning considerations:

- Proposal Need and Strategic Importance;
- Policy Support;
- Environmental Impacts (Landscape, Biodiversity and Residential Amenity, etc) and,
- Economic Benefit.

7.1 Is There an Established Need for the Proposal and is its Provision of Strategic Importance?

This section further outlines the strategic need for the development based on an assessment of current energy security as well as policy and legislative support at international, national, regional and local levels, which seek to implement legally binding national climate change targets by encouraging wind energy development within appropriate locations.

The Report produced by Eirgrid, entitled *Ireland Capacity Outlook (2022-2031*[7]*)* illustrates a significant rise in demand for electricity in the coming years, stemming from a multitude of factors such as population increase and uptake of EV car usage since its introduction in 2017.

The Report notes a significant forthcoming increase in the National Total Electricity Requirement for the nation by 37% by 2031, compared to the recorded annual levels of 2022.

This unavoidable forthcoming increase in energy demand further informs the need for renewable energy development, in order to equip the National Grid for the demand challenges of tomorrow.

Successive governments, have stressed that Ireland needs to invest in energy infrastructure and development which does not create a further dependency on fossil fuels and impede on the nation's ability to adhere to national climate targets, including future carbon budgets, and

[7] https://cms.eirgrid.ie/sites/default/files/publications/EirGrid_SONI_Ireland_Capacity_Outlook_2022-2031.pdf

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the legally binding demand that Ireland meets the 51% GHG emissions reduction target by 2030 as legislated for in the *Climate Action And Low Carbon Development Act (2021)*.

Ireland is both currently dependent on fossil fuel consumption in general in order for the National Grid to function, and energy dependent on neighbouring nations for the security of this supply of power.

Indeed, at present, Ireland is one of the most energy import-dependent countries in the EU with 71% of all natural gas supplies being imported via two gas interconnector pipelines from GB (IC1 and IC2) in 2020[8]. This share is expected to increase as Ireland's indigenous gas supplies from Corrib decline over the next decade.

Serious negative impacts upon the price of natural gas and other forms of energy, stemming from the Russia-Ukraine war, also illustrate how sensitive imported energy supply and prices are to international instability, with the SEAI's *Electricity Prices in Ireland Report, January to June 2022*[9], illustrating a significant and continued increase in the cost of supply of such forms of energy.

It is thus imperative from a national security standpoint for Ireland to decouple from reliance upon imported energy and to transition towards energy independence through renewable forms of energy, which are not as vulnerable in regard to supply and cost as other forms of energy.

Section No. 6 of this Statement, along with policy at an international, national and regional level as detailed within the accompanying EIAR submitted with this subject planning application, recognises a clear need for an urgent transition to a carbon-neutral economy and society, at all levels, through the provision of a sustainable, renewable energy supply and associated grid infrastructure.

At an international level, Ireland is party to a number of legally binding emission reduction targets.

These include the *Paris Agreement*, a legally binding international treaty on climate change, which was entered into force on 4th November 2016.

Further to this, the *Renewable Energy Directive*, *Directive (EU) 2018/2001*, and its subsequent amendments in the form of RED II and RED III, as well as *the European Green Deal (2019),* all prioritise the following three objectives:

- Ensuring a secure and affordable EU energy supply at all levels, including local, regional and national.

- Increasing the speed of decoupling from fossil fuels to renewable forms of energy.

[8] https://www.gov.ie/en/consultation/dbe14-review-of-the-security-of-energy-supply-of-irelands-electricity-and-natural-gas-systems/
[9] https://www.seai.ie/sites/default/files/publications/SEAIs-EPR-data-for-JAN-to-JUN-2022.pdf

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- Meeting emission reduction targets while increasing energy independence.

REPowerEU, presented by the *EU Commission* in May 2022, again illustrates that since the Russian invasion of Ukraine, energy prices across the EU have increased significantly. This informs a new reasoning and increased urgency in the provision of renewable electricity infrastructure, in order to enable greater energy security in supply and lessen the currently experienced volatility in price.

The directive target increases in emissions reduction target and the legal principle in RED III that renewable energy projects are presumed to be in the overriding public interest and serving public health and safety, underlines the significant importance in developing renewable energy sources, such as onshore wind in order to increase the domestic renewable energy production capacity of Ireland and its contribution to the EU overall target.

At a national level, Ireland faces significant challenges in achieving its emissions reduction targets, with such targets currently being thwarted due to high rates of imported fossil fuel dependency, increasing energy demand and delays with the delivery of significant renewable energy projects. Rising energy prices and potential political instability add to fossil fuel price volatility. The proposed project aims to address these challenges by providing reliable, secure, and affordable energy supplies, potentially reducing reliance on imported fuels.

Under the latest *Climate Action Plan (2025)*, detailed within Section No. 6 of this Statement and adopted in 2025, Ireland is committed to significant emission reduction targets, with such including an 80% share of energy provision from renewable forms of electricity and 9 GW of onshore wind capacity by 2030. Further to this, the *Revised National Planning Framework* introduces new objectives and a greater emphasis than its predecessor with regard to accelerating the decoupling of Ireland's energy infrastructure away from imported fossil fuels to renewable power generation at home at a regional level. As detailed within the accompanying EIAR, the *Revised National Planning Framework (2025)* also sets new targets for renewable energy provision, including regional renewable electricity capacity allocations to facilitate the accelerated roll-out of renewable electricity infrastructure.

Further to this point, *Repowering Ireland*, a recently published Report commissioned by *Wind Energy Ireland*[10] states that up to 76 No. Wind farms, currently operating and exporting energy to the National Grid, will reach the expiration of their planning permission by 2030. This will result in a loss of capacity of up to 854MW through the expiration of permission and the decommissioning of the associated wind farms, equating to around a fifth of the total installed onshore wind energy capacity.

This is not inclusive of 103 No. projects, representing 1,168MW, which have no defined permitted operating lifespans within their planning permission records, but will inevitably have to be decommissioned when it becomes cost-prohibitive to keep operating them.

[10] https://mkoireland.ie/insights/repowering-ireland-report/#:~:text=The%20report%20commissioned%20by%20Wind,their%20planning%20permission%20by%202030.

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And further still, the *Report* details within its key findings that 769MW of currently installed capacity across the Northern and Western Region is set to be decommissioned by 2040.

While a number of these wind farms may have their permissions extended, the Report also noted that a repowering capacity analysis of a sample of wind farms showed that applying present-day design, planning and environmental constraints would result in a reduction of 35% in the installed capacity of the repowered projects, compared to the existing capacity.

The negative effects of these findings are incredibly significant and illustrate the need for Ireland to significantly increase available wind energy capacity nationwide in order to meet carbon emission reduction targets and offset the loss of currently operational wind farms in future decades.

The *Regional Spatial and Economic Strategy (2020-2032), Roscommon County Development Plan (2022-2028)* and its associated *Renewable Energy Strategy* are also clear in their support for the renewable energy sector and recognise its importance for a secure and resilient energy supply.

It is submitted that the construction of the proposed project would with certainty have a significant positive environmental contribution in aiding the switch and decoupling from a fossil fuel-based energy dependence to a source of sustainable to renewable energy.

In conclusion, it is submitted that the following factors make it imperative at the national level to significantly increase domestic renewable energy generation plants, such as the proposed project, in order to ensure the provision of reliable, secure, renewable and affordable energy supplies in Ireland at a local, community and regional level:

1. Current high rate of continued fossil fuel importation reliance;

2. The reduction of the Corrib Gas Field supply, the ensured future increase in demand for electricity stemming from a multitude of factors, including population growth;

3. The closure of existing wind farm developments as they reach the end of either their operating life or span of operation permitted;

4. Increased energy price volatility due to geopolitical events.

7.2 Is there Planning Policy Support for the Subject Proposal?

It is submitted that, as detailed previously within this Statement, the subject proposal is fully compatible with the overarching aims and objectives of all relevant policy documents pertaining to the subject development at national, regional and local levels.

Concerning policies of relevancy at national level relating to the subject proposal, it is submitted that the subject accords perfectly with the provision of both the *National Planning Framework (2018)* and its revised successor, it is especially worth noting that the proposed project is entirely aligned with the *Revised National Planning Framework (2025)*, considering its increased emphasis on the importance of increased on shore wind energy provision and associated targets for each national region to fulfil by 2030.

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The development fully accords with the aims of the *Climate Action Plan (2025)*, which seeks a significant acceleration of the transition from importation of fossil fuels to renewable-based forms of energy to achieve legally binding emission reduction goals.

At a regional level, as detailed within this Statement, the subject proposal is in line with the aims of the *RSES* relating to the development of renewable energy projects and the decarbonisation of the National Grid.

The subject proposed project aligns with the relevant provisions of the *Roscommon County Development Plan (2022-2028)* relating to the provision and location of renewable energy development, along with its accompanying *Renewable Energy Strategy*.

The subject Development Plan is clear in its support for the provision of wind energy development within the County, albeit as long as such development accords with the principles of proper planning and sustainable development as outlined in Objectives CAEE 8.4 & 8.6.

Further to this, CAEE 8.7 & 8.8 make it fundamentally clear that the Local Authority seeks to achieve the appropriate balance between renewable energy development and preservation of the natural environment, which the proposal strikes.

As detailed above, Objective CAEE 8.5 seeks to guide the location of wind energy development by facilitating wind energy developments primarily in areas designated in the Renewable Energy Strategy as *"Most Favoured"* and secondarily in areas designated as *"Less Favoured"* in the Renewable Energy Strategy, clarifying which areas within the administrative region of *Roscommon County Council* are preferred for development of this and which areas wind energy development, particularly of scale, will be resisted.

It is submitted that crucially, the subject proposal aligns with CAEE 8.5 of the Development Plan, as well as the Strategy by proposing a renewable energy development in an area designated as *"Most Favoured"* and as the accompanying EIAR details, will not have any adverse effect on human health or the environment, and aligns with all objectives of the Development Plan pertaining to climate change, biodiversity, landscape, environment.

The proposed project would also align with CAEE 8.13 of the County Development Plan through the provision of sustainable and renewable base energy to local communities within the region, and thus aiding the County Objective of increasing the number of Sustainable Energy Communities (SECs) in County Roscommon to at least 50 by 2030.

The proposed project is fully compliant with *the Planning Guidelines for Wind Farm Development (2006)*, has due regard for the *Draft Wind Energy Development Guidelines (2019)* should the draft revised guidelines come into effect as required by both the *Roscommon County Development Plan (2022-2028)* and its accompanying *Renewable Energy Strategy*, and has taken into account industry best practise in regard to development of wind energy development.

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By producing energy through renewable means, the proposed project would make a reliable resilient and efficient contribution to the energy security of Roscommon County. It also caters to the growth outlined throughout the plan and supports economic and population growth of the county through sustainable means, thus aligning with the core principles and objectives of the County Development Plan.

7.3 Are the Environmental Impacts Stemming from the Subject Proposal Acceptable?

7.3.1 Introduction

The following environmental considerations are reviewed in this section:

- Biodiversity;
- Visual Impact;
- Shadow Flicker;
- Noise, and
- Overall Impact on Residential Amenity

As referred to previously, an *Environmental Impact Assessment Report* has been prepared by *Rowan Engineering Consultants Ltd* for the proposed project and has been submitted with the planning application. The EIAR provides a detailed analysis of all environmental factors relevant to the application and is set out as follows:

- Chapter 1 – Introduction;
- Chapter 2 – Project Description;
- Chapter 3 – Consideration of Alternatives;
- Chapter 4 – Population and Human Health;
- Chapter 5 – Biodiversity;

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- Chapter 6 – Planning and Policy;
- Chapter 7 – Land soils and geology;
- Chapter 8 – Hydrology;
- Chapter 9 – Air Quality and Climate;
- Chapter 10 – Noise and Vibration;
- Chapter 11 – Landscape and visual;
- Chapter 12 – Traffic and Transport;
- Chapter 13 – Archaeology, Architectural and Cultural Heritage;
- Chapter 14 – Material Assets;
- Chapter 15 – Shadow Flicker;
- Chapter 16 – Cumulative Effects Assessment;
- Chapter 17 – Interrelated Effects and
- Chapter 18 – Schedule of Mitigating and Monitoring.

In association with the EIAR, other assessments/studies were conducted, including:

- EIA Scoping Report;
- Scoping Consultation Responses & Reply;
- Assessment of Representative Viewpoints;
- Traffic & Transportation Assessment;
- Geo Physical Survey Report;
- Site Suitability Study;
- Outline Habitat Management Plan;
- Technical Appendix Statutory Sites;
- Technical Appendix Mammals and Other Receptors;

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- Technical Appendix Habitat;
- Technical Appendix Ornithology;
- Technical Appendix Bats;
- Technical Appendix Aquatic Ecology;
- Construction Environmental Plan (CEMP);
- Soils & Geology Technical Assessment;
- Preliminary Ground Investigation;
- Flood Risk Assessment;
- Landscape Visual Impact Assessment;
- Archaeological and Built Heritage Assessment, and
- Appropriate Assessment Screening and Natura Impact Statement.

It is submitted that, as detailed within supporting documentation and assessments submitted with the subject proposal, the proposed development meets the requirements of applicable policy at all levels, so as not to have detrimental and adverse impacts on the surrounding natural environment, including water quality, landscape or biodiversity.

7.3.2 Biodiversity

Chapter No. 6, Volume Two of the EIAR submitted with this application confirms that the potential ecological effects arising from the development can be satisfactorily mitigated, and that no likely significant adverse effects upon local biodiversity are expected.

In turn, a *Species and Habitat Management Plan* has been developed and submitted with this application that will provide ecological conservation of the Site for the long term, a strategic document that outlines the actions necessary for the maintenance, conservation and enhancement of the specific habitat of the development.

The overall findings of the EIAR demonstrate that the environment can successfully accommodate the proposal without significant adverse effects upon local biodiversity, striking the balance between the provision of new renewable energy development without environmental degradation, as sought by the Roscommon County Development and all policies at all levels.

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7.3.3 Visual Impact

Chapter No. 11, Volume Two of the EIAR submitted with this application confirms that the significance of landscape effect during the operational phase is considered to be Moderate/Adverse/Long-term within and immediately around the Site. Thereafter, the significance will reduce to Slight and Imperceptible at increasing distances, as the development becomes a progressively smaller component of the wider landscape fabric, even in the context of higher-sensitivity landscape units/features. Therefore, landscape effects generated by the proposed project are deemed Not Significant, in EIA terms.

The EIAR and accompanying Landscape Visual Impact Assessment also note that, in terms of the residual visual effect, the operational phase visual effects generated by the proposed wind farm will result in some localised Substantial-Moderate residual visual effects. However, these are not considered to reach the Significant threshold. While the proposed wind farm will present a dominant visual presence from some of the nearest receptors, the design of the proposed wind farm Site directly responds to the guidance for the 'Hilly and Flat Farmland' landscape type in the current WEDG's 2006, which helps the development assimilate into this robust, rolling rural landscape context. Furthermore, the proposed project does not conflict with any landscape and visual-related policies or objectives within the relevant CDPs within the Study Area.

Thus, it is considered that the proposed project will generate no likely significant effects at the construction or operation stage.

This Landscape Visual Impact Assessment was conducted through analysis of the subject proposal from 25 No. Viewpoints selected within the surrounding area of varying distances from the proposal, as well as height.

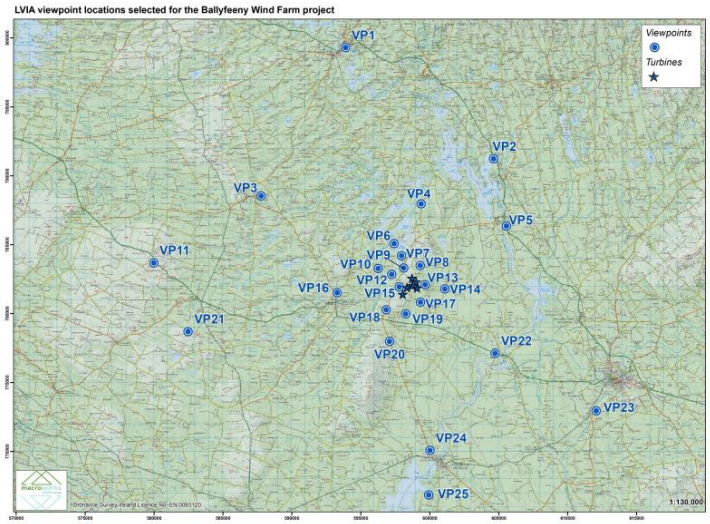


Figure 7.3.1: Map created with extracts from Landscape Visual Impact Assessment (created by Macro Works Ltd, 2025).

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The rationale for the selection of viewpoints was informed by the value of views with reference to a range of criteria, including the Development Plan scenic view and route designations, specific viewpoints raised within the Pre-Planning Meeting with the Local Authority, highly sensitive landscape areas, as well as other areas identified from on-site research and best practice experience.

Furthermore, photomontages have been prepared and are included in Volume Five of the EIAR of this application pack.

For further details, please refer to Chapter No.11, Volume Two of the EIAR submitted this subject application.

7.3.4 Impacts Associated with Decommissioning

In regard to the decommissioning of the proposal, it should be noted that a Decommissioning Management Plan prepared by Rowan Engineering Consultants is contained within Appendix No. 2, Volume Three of the EIAR submitted with this application.

As detailed within the Plan, at the end of the operational life of the proposed project, the turbines will be dismantled and taken off-site for recycling. The Turbine Foundations will remain in situ and will be covered with soil and reseeded as appropriate. The turbine hardstands will also be reinstated, and site access tracks will either be reinstated or left in situ. The Wind Farm Internal Cabling will be removed, while the ducting will remain in situ. The onsite substation will be left in situ as it will form part of the Grid.

This subject Decommissioning Management Plan submitted with this application provides the environmental management framework to be adhered to during the decommissioning phase of the project, and it incorporates the mitigating principles to ensure that the work is carried out in a way that minimises the potential for any environmental impacts to occur.

7.3.5 Shadow Flicker

A Shadow *Flicker Assessment* has been prepared and is contained within Chapter No. 15, Volume Two of the EIAR submitted with this application in order to assess the potential for shadow flicker occurrence resulting from the proposed project at its nearest receptors.

It is noted that the subject Chapter concludes that there will not be any discernible effects from shadow flicker during the construction or decommissioning phases. The developer has committed to eliminating adverse operational effects by the inclusion of mitigation in due

regard for the 2019 draft WEDG. Thus, residual shadow flicker effects are considered to be Imperceptible. In EIA terms, the effect is considered as Not Significant.

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7.3.6 Noise

In assessing potential noise impacts relating to the construction and operation of the subject proposed project, all sensitive receptors within c. 2 kilometres of the subject site were identified and assessed against the predicted effects of the proposed project.

Chapter No. 10, Volume Two of the EIAR submitted with this subject application, entitled *'Noise and Vibration',* concludes that during the construction and decommissioning phases, the effects will vary from Imperceptible (Not Significant in EIA terms) to Slight (Not Significant in EIA terms) depending on the activity and distance. During the operational phases, the effects will be considered as Not Significant.

Further to this, after the proposed mitigation measures have been adopted, the range of residual noise effects is expected to be minimised. These mitigation measures, in accordance with the EPA Guidelines, along with the application of binding limits, working hour restrictions, and the implementation of appropriate noise control measures, will ensure that noise and vibration effects are kept to a minimum.

A post-construction Noise Complaint Monitoring Programme (NCMP) will be adopted for the proposed wind farm.

In conclusion, predicted noise levels associated with the proposed project during construction, operation and decommissioning will be in line with the relevant legislative guidance and industry best practice.

7.3.7 Overall Impact on Residential Amenity

As detailed within this Statement, the main impacts on residential amenities arising from wind farms are visual impact in tandem with shadow flicker, as well as noise.

With sensitive receptors including residential dwellings being identified at a primary stage of the design process, it has been ensured through consistent assessment that the residential amenity of dwellings within proximity to the proposed project will not be significantly adversely affected during either the construction, operation or decommissioning phases of the subject development with best practise standards in mitigation of potential effects employed at all times by the Design Team.

Such findings are detailed further within the accompanying EIAR and relevant assessments submitted with this subject application.

7.4 What is the Economic Benefit of the Proposal?

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The subject proposal is predicated on current technology to contribute between 25-29MW of renewable electricity to renewable energy targets, while providing jobs, economic development, and a community development fund, which would result in positive socio-economic impacts on the region, in line with the objectives of the Roscommon County Development Plan.

As detailed within the aforementioned Community Engagement Report submitted with this application, in line with Community Benefit Fund Guidelines, governed by the Sustainable Energy Authority of Ireland (SEAI), and based on the current project scope, Ballyfeeny Green Energy will generate a Community Benefit Fund estimated at over €1.8 million over the first 15 years of operation. This amounts to approximately €125,000 per annum. Ballyfeeny Green Energy will work in partnership with residents in the local area to form a committee to oversee the administration of the Community Benefit Fund. The committee will be established once the project completes the planning permission process and the necessary grid connection process.

8.0 CONCLUSION

Having regard to the land use zoning objectives for the area, the strategic policy context, the existing nature of the site and its surroundings, we submit that the proposed scheme would not seriously injure the amenities of the surrounding area and would be acceptable in terms of environmental impacts.

The proposed project supports the doubling of onshore wind energy in Ireland by 2030 and contributes to the nation's target increase of renewable energy from 30% to 80% by 2030 as set out in the *Climate Action Plan (2025)*, while supporting the aims of the *Roscommon County Development Plan (2022-2028)* regarding transition from reliance of rural communities upon fossil fuel consumption to a renewable means in the form of appropriately located wind energy.

Furthermore, it is considered that the proposed project has been purposefully designed to ensure consistency with strategic national policy and relevant guidance. The development is consistent with *Roscommon County Development Plan (2022-2028)*, and its *Renewable Energy Strategy*, policies that aim to tackle climate action, ensure sustainable development, and contribute to the achievement of Ireland's legally binding targets for decarbonisation and renewable energy production.

The EIAR and other accompanying assessments/studies cover an extensive list of environmental, economic and social factors relating to the proposed project. It is concluded that, in combination with proposed mitigation measures, it is predicted that the development will not have a likely significant adverse effect on the environment.

It is considered that the proposed development would accord with European, national, regional and local planning and that it is acceptable in respect of its likely effects on the environment and its likely consequences for the proper planning and sustainable development of the area.

We, therefore, submit that the proposed development would be in accordance with the proper planning and sustainable development of the area and should be supported.

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Tom Phillips + Associates

Encl.

Appendix A - Planning History Overview

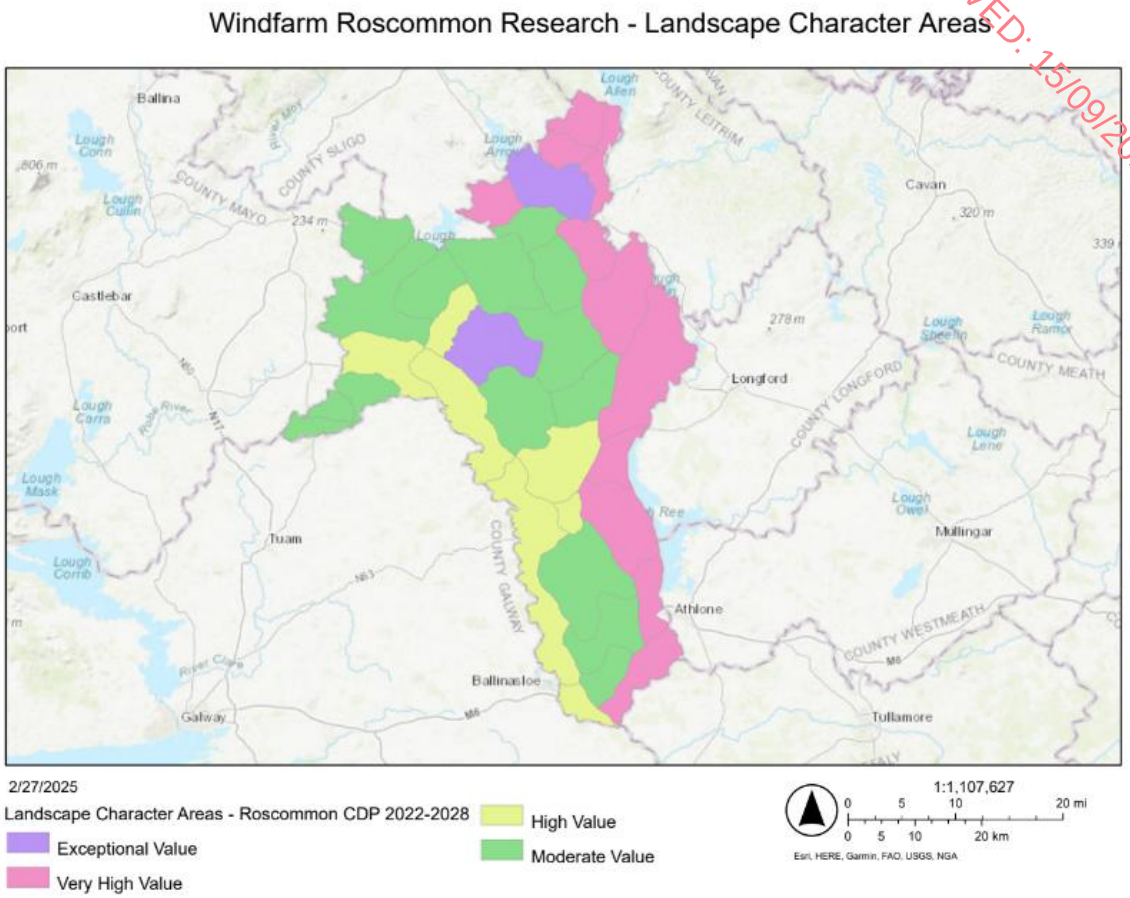
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Reg. Ref.	Development	RCC Decision
21138	To construct dwelling house along with domestic garage, new treatment system, a percolation area, and all ancillary site development works at Ballyfeeny, Parkowen, Co. Roscommon.	Grant Permission
20312	To construct an agricultural shed for seasonal storage of organic fertilisers along with a soiled water containment tank, concrete apron, and all ancillary site works at Ballyfeeny, Scramogue, Co. Roscommon.	Grant Permission
041772	To develop an operations yard for baling and short-term storage of black farm plastic, to install an effluent tank for fluid run off, to erect a toilet, to install a septic tank and percolation system, to erect a shed to cover bailer operation and to erect a boundary fence at Ballyfeeny Townland, Scramogue, Co. Roscommon.	Grant Permission
07272	For a quarry and ancillary processes (blasting, crushing, screening) in accordance with section 261 of the Planning & Development Act 2000 at Ballyfeeny/Tully (E.D. Kilglass South) Td, Kilglass, Strokestown, Co. Roscommon.	Grant Permission

Summary Table of relevant Planning History for Subject Site. (Source: Roscommon County Council and An Bord Pleanála with information formatted and summarised by Tom Phillips + Associates).

Appendix B – Landscape Character Areas – Roscommon County Development Plan (2022-2028)

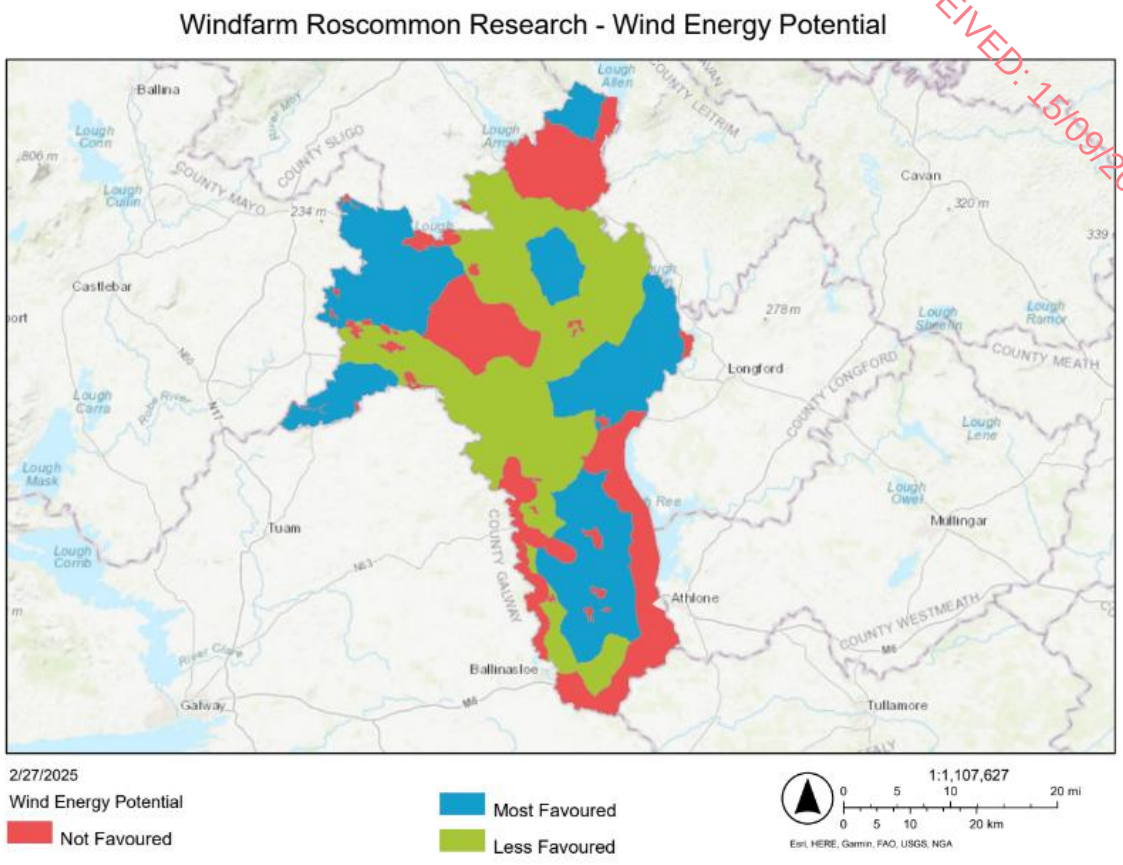
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Map of landscape character areas within Roscommon CDP (2022-2028) (Source: Roscommon County Council GIS Datasets with info mapped via GIS by Tom Phillips + Associates).

Appendix C – Wind Energy Potential – Roscommon County Development Plan (2022-2028)

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Map of wind energy potential areas within Roscommon CDP (2022-2028) (Source: Roscommon County Council GIS Datasets with info mapped via GIS by Tom Phillips + Associates).

Appendix D – Renewable Energy Directive III – Completeness Check

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Renewable Energy Directive III – Completeness Check				
	N/A	**Yes**	**No**	**Information**
Misc				
Correct Fee submitted		**X**		Please see the application form submitted for calculation details.
Completed copy of the application form		**X**		Please see the submitted application form with this application.
Is the application in a Gaeltacht Area			**X**	The subject application is not set within a Gaeltacht.
Standalone website provided		**X**		Yes - please see https://ballyfeenygreenenergy.ie/
Two hard copies and 8 soft copies received	**X**			In this regard, we note the email received from Roscommon County Council's Planning Department on 2nd September 2025, in which the Local Authority confirmed that the planning application can be submitted via the ePlanning online portal.
Land Ownership				
Interest of the applicant in the land confirmed		**X**		The applicant's interest in land is as a developer, with letters of consent provided by landowners.
If not, the written consent of the owner is submitted.		**X**		Letters of consent provided.
Design Flexibility				
Was a Design Flexibility Opinion served		**X**		Yes – referenced DFR/25/1 and is submitted with this application.
If Yes – Does the application comply with the Opinion		**X**		Yes – the subject application adheres to this Opinion.
Public Notices				
Is the time period and fee for submissions/observations specified		**X**		Reference contained within public notices.
Reference to REDIII and completeness check, where applicable		**X**		Reference contained within public notices.
Includes a standalone website Address		**X**		Reference contained within public notices.
Are notices in Irish if in Gaeltacht*	**X**			N/A

Transboundary environmental effects			**X**	No, the project is entirely located within Ireland.
Do COMAH Regulations (Major Accident Hazard Regulations 2015) Apply	**X**			N/A
If the Design Flex Opinion is provided, is this referenced		**X**		Reference contained within public notices.
Are EIAR and NIS referenced?		**X**		Reference contained within public notices.
Prescribed Bodies				
Have the Prescribed Bodies specified at the conclusion of the pre-application consultation been notified		**X**		Pre-planning meeting conducted on 27th of February, with Roscommon County Council (planning authority).
Planning Statement				
Renewable Energy Designation Policy Statement		**X**		Contained within the Planning Statement.
EIAR				
Have EIAR portal requirements been completed		**X**		Subject requirements have been completed. Please see Part 1 - Planning Pack.
Are all Appendices included?		**X**		All appendices are included.
Are derogations required/been obtained (biodiversity)		**X**		Yes, derogations not required. Please see Chapter 6, Volume Two of the EIAR.
Does EIAR comply with Article 94 and Schedule 6 of PDR 2000		**X**		Yes, please see the contents of the EIAR submitted.
NPWS survey, methodology requirements		**X**		Yes, please see Chapter 6, Volume Two of the EIAR.
Peat Stability/Landslide Susceptibility		**X**		Yes, please see Chapter 7, Volume Two of the EIAR.
NIS				
Is a screening report included?		**X**		Yes, the screening report is included, please see Volume Six of the EIAR.
Are all the appendices referenced included		**X**		Yes, please see Volume Six of the EIAR.
Drawings				

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Site Location Map		**X**		Please see the submitted drawing pack. Refer to Part 1 – Planning Pack.
Site Layout Plan – wayleaves, site notices		**X**		Please see the submitted drawing pack. Refer to Part 1 – Planning Pack.
Are the Drawing Scales Appropriate		**X**		Yes, please see the submitted drawing pack. Refer to Part 1 – Planning Pack.

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Appendix E – Pre–Planning Minutes from Meeting Held 27th February 2025

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Rowan

Roscommon County Council
Planning Office
Áras an Chontae
Roscommon
County Roscommon
F42 VR98

Re: Preplanning Meeting 27th February 2025 PL/657/25

Dear Sir/Madam,

In relation to the proposed planning application by Ballyfeeny Green Energy Limited (the 'Developer') for a wind farm and associated infrastructure in the townland and environs of Ballyfeeny, in County Roscommon (hereafter referred to as the 'Project'), a pre planning meeting was held between the Local Authority (Roscommon County Council), the Developer, their Agent (Rowan Engineering Consultants Ltd.) and selected specialists who would input into the application and environmental impact assessment process. The meeting was held via MS teams at 15:15, on the 27th February 2025.

A copy of the presentation from the meeting is appended to this letter.

In the absence of minutes of the meeting, the proposed Project wishes to summarise and confirm the key items discussed in the Pre-Planning meeting, to ensure they are captured in the Environmental Impact Assessment Report (EIAR) and the associated planning application.

Key confirmations included:

- Planning for this project can be submitted through the Online Planning Portal
- Townland names and townland index can be confirmed with the Roscommon County Council Validations team
- Roscommon County Council acknowledged receipt of the Scoping Report but indicated they did not intend to formally respond to the Scoping Report at this time
- Design Flexibility will be requested and Roscommon County Council directed the project to the new application process and forms
- In order to produce comparative drawings of the three technology options to allow side by side comparison, technical drawings pay be presented at 1:500 scale or other scales for the application. Roscommon County Council noted that this is acceptable but asked that 1:200 scale drawings for each of the technology options also be provided.
- The site is zoned in an area designated as 'Most Favoured' for wind energy development as stated in the Renewable Energy Strategy that supports the Roscommon County Development Plan 2022 – 2028. The location of the site is strategic and is likely to be acceptable in

Forensic & Environmental Engineering
Head Office: Unit 14 Scurlockstown Business Park, Trim, Co. Meath, C15 H008, Ireland.
t: +353 46 903 0102 m: +353 86 832 7792 e: info@rec.ie w: www.rec.ie
Galway Office: Office 18, Oran Town Centre, Station Road, Oranmore, Co Galway, H91 APK0, Ireland.

Rowan Engineering Consultants Limited. A private company limited by shares. Registered in Ireland No 282592.
Registered Office: Unit 14 Scurlockstown Business Park, Trim, Co. Meath.
Directors: Tom Rowan, Aoife Smullen.

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principle. However, the proposed wind farm site, is also adjacent to areas of Very High Landscape Value. The Local Authority advised that viewpoints for the Landscape and Visual Impact Assessment (LVIA) should capture scenic routes in the vicinity of the proposed Project and heritage sites such as the Rathcroghan and Tulsa Plateaus.

- The Developer confirmed the project was being designed having due regard to the 2019 Draft Wind Energy Development Guidelines, with a visual amenity of four times the tip height of the wind turbines, subject to a mandatory minimum setback of 500 meters was required from all residential dwellings
- The Developer confirmed the project was being designed with due regard to the 2019 Draft Wind Energy Development Guidelines in regard to Shadow Flicker.
- The Developer confirmed that site investigation were ongoing at the site and would be presented in the EIAR, the investigations undertaken, confirmed that there was no presence of peat deposits in the site.
- The Developer presented the proposed turbine delivery route(s) highlighting a preference to utilise, the new N5 bypass of Strokestown for delivery. The Local Authority agreed this is the preferential route and accepted the proposal to also assess a route on the existing road network in the unlikely event the N5 upgrade is not completed by the proposed construction of the project. The Local Authority also noted that there is a Public Realm project awarded for Strokestown, proposing to narrow the main street and increase town centre amenity area in conjunction with the transfer of traffic to the new road. As the project had been announced the project agreed to include note of the proposal in the EIAR assessment.
- In relation to the Grid Connection Route, it was discussed that the preferred route was to the existing Sliabh Bawn 110kV Substation. The Local Authority directed the project team to liaise with the Assets department of Roscommon County Council consents required for submission of the Planning Application. The Local Authority advised, such works would be subject to Road Opening License requests via roads department and would be subject to a bond being put in place, in the event planning was granted but in advance of works. Where works would impact the carriageway of the R371, the Local Authority requested the project consider full width reinstatement.
- The Local Authority raised a number of items to consider, including nearby licenced sites with discharges, noise assessment requirements, registered drinking water abstraction points, when preparing the EIAR.

Actions from the meeting included the following:

- The project would make an application under Section 32 of the Planning and Development Act (as amended) and request a separate Design Flexibility Meeting under Section 32H. As agreed, the project will provide full information on the Design Flexibility options with this request, in advance of the meeting, in the interests of supporting the Council to make a timely response with the Design Flexibility Opinion.
- The project will make a request under Article 22 for a *Letter of Consent* from the Local Authority to be submitted with the planning application which consent for proposed works on lands within the control of Roscommon County Council
- The project committed to keeping the Council informed on project progress and would contact the Council in advance of planning submission date for their information. In the meantime the project will contact the Assets and Validation departments in the Council for further information.

In regard to the above, we would ask that Roscommon County Council could confirm by response that the summary is an accurate reflection of the discussion and that it covers the major points raised.

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Kind regards



James Massey
Senior Environmental Consultant
Rowan Engineering Consultants Ltd.
Mob: 085 2533202
Tel: +353 46 9030102 Extn: 32
Email: James.Massey@rec.ie

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