

2. BACKGROUND AND POLICY

This section of the EIAR sets out the relevant Energy and Climate Change related policy and targets, the strategic, regional, and local planning context for the Proposed Development, scoping and consultation, and the cumulative impact assessment process.

2.1 Introduction

This section of the EIAR presents the policies and targets which have been put in place both nationally and internationally in relation to renewable energy and climate change. The details below set out the need for the Proposed Development to aid Ireland in meeting its national targets and European commitments in relation to climate change and decarbonisation.

The Proposed Development comprises the provision of a wind farm of 21 no. wind turbines (each with an expected generating capacity of c. 6-9MW of renewable energy) and provide renewable energy for use on the national grid. The need to decarbonise the economy and reduce emissions has always been imperative, however in recent years the urgency involved has become clearer to all stakeholders. The Climate Action Plan (CAP) published by the Government in 2023 sets out the detail for taking action to achieve a 51% reduction in overall greenhouse gas emissions by 2030, and to reach net-zero emissions by no later than 2050. The 2023 Plan builds on the measures and technologies set out in the 2019 Climate Action Plan to deliver greater ambition. The greater ambition requires a greater range of measures under the 2023 Plan, reflected in two categories of ‘core measures’ and ‘further measures’. ‘Core measures’, set out to meet the 2030 targets, cover the fundamentals of decarbonisation and include the development of a renewable energy electricity supply. These ‘core measures’ are not, by themselves, sufficient to deliver the ambitions set out in the CAP and so a series of ‘further measures’ will also be necessary which are more technically challenging or not yet available in Ireland at the scale required, e.g. Biogas/biomethane, green hydrogen, carbon capture and storage. While deploying all the core measures would reduce emissions by 10-11 MtCO₂eq. by 2030, undertaking further measures could close the gap. All sectors will have to further their efforts from those outlined in the CAP if the core and further measures are to be achieved.

The primary driver behind the Proposed Development is the need to provide additional renewable energy to offset the use of fossil fuels within the electricity generating sector. Increasing electricity generation from wind power represents the most economical renewable option to reduce emissions within the power generation sector and is the most mature technology available to achieve national targets that have been established for decarbonisation.

This review of relevant policy contained in this Section of the EIAR sets out how the proposed Sheskin South Wind Farm is consistent with the overarching planning framework with regard to facilitating the move away from dependency on fossil fuels and the promotion of proper planning and sustainable development.

2.2 Climate Change Policy and Targets

International and national policy consistently identifies the need to reduce greenhouse gas (GHG) emissions and stresses the importance of reducing global warming. The context of international policy has altered over the last 30-years from being of a warning nature to the current, almost universally accepted belief, that there is a climate change emergency occurring both within Ireland and at a broader

global scale. The Intergovernmental Panel on Climate Change (IPCC)'s Sixth Assessment Report¹ published in 2021 provides a stark assessment of global climate change and presents evidence that climate changes will increase in all regions of the globe over the coming decades and that much of the damage caused by climate change up to this point is now likely irreversible, such as the rise in sea levels over the 21st century. The Climate Status Report for Ireland 2020² similarly reflects on clear and distinct impacts arising from climate change effects within an Irish context:

- An increase in the number of warm spell days over the last 60 years with very little change in cold spell duration;
- Annual precipitation was 6% higher in the period 1989–2018, compared with the 30-year period 1961–1990, and the decade 2006–2015 has been the wettest on record;
- Satellite observations indicate that the sea level around Ireland has risen by approximately 2–3mm per year since the early 1990s; and
- In 2018, carbon dioxide emissions were almost 18% higher than in 1990, primarily due to increased fossil fuel combustion in transport and energy industries

The IPCC's Sixth Assessment Report does not, however, conclude that a climate catastrophe is inevitable, but rather, there remains a 'narrow path' to determine the future course of climate, mainly by cutting emissions down to net zero. The Proposed Development will contribute to the decarbonisation of the energy sector and reduce harmful emissions. In this regard, it is in compliance with national and international climate change policy and targets.

2.2.1

International Policy

United Nations Framework Convention on Climate Change

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

Kyoto Protocol

The Kyoto Protocol operationalises the UNFCCC by committing industrialised countries and economies in transition to limit and reduce GHG emissions in accordance with agreed individual targets. Ireland is a Party to the Kyoto Protocol, which came into effect in 2005, and as a result of which, emission reduction targets agreed by developed countries are now binding.

In Doha, Qatar, on 8th December 2012, the "*Doha Amendment to the Kyoto Protocol*" was adopted. The amendment includes:

- New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from 1st January 2013 to 31st December 2020;
- A revised list of greenhouse gases (GHG) to be reported on by Parties in the second commitment period; and

¹ *Climate Change 2021 'The Physical Science Basis' (Intergovernmental Panel on Climate Change, August 2021)*

² *Climate Status Report for Ireland 2020 (Environmental Protection Agency, Marine Institute, Met Éireann, August 2021)*

- Amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period.

Under the protocol, countries must meet their targets primarily through national measures, although market-based mechanisms (such as international emissions trading) can also be utilised.

COP21 Paris Agreement

COP21 was the 21st session of the Conference of the Parties (COP) to the UNFCCC. Every year since 1995 (excluding 2020 due to COVID-19), the COP has gathered the 196 Parties (195 countries and the European Union) that have ratified the Convention in a different country, to evaluate its implementation and negotiate new commitments. COP21 was organised by the United Nations and held, in Paris, from 30th November to 12th December 2015. COP21 closed with the adoption of the first international climate agreement (concluded by 195 countries and applicable to all). The 12-page text, made up of a preamble and 29 articles, provides for a limitation of the global average temperature rise to well below 2°C above pre-industrial levels and **to limit the increase to 1.5°C**. It is flexible and takes into account the needs and capacities of each country. The IPCC's 6th Assessment Report (2021) further collaborates this need to limit any increase in global average temperature to 1.5°C, stating that (underlined for emphasis),

“Humanity has emitted 2,560 billion equivalent tons of CO₂ since 1750, and we only have a budget of 500 more if we want to limit warming to 1.5°C.”

By following a trajectory of very low GHG emissions (SSP1-1.9), the threshold of 1.5°C will be reached in the short term, between 2021 and 2040, before being very slightly exceeded (1.6°C anticipated over the period 2041-2060) then respected in the long term (1.4°C anticipated over the period 2081-2100).

“Everything is not lost, but we must pursue the Paris Agreement’s most ambitious goal of limiting warming to 1.5°C.”

An article published by the IPCC on the 6th October 2018 titled ‘*Global Warming of 1.5°C*’, notes the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways; in the context of mitigation pathways, strengthening of the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty. This special report is part of an invitation contained in the Decision of the 21st Conference of Parties of the United Nations Framework Convention on Climate Change to adopt the Paris Agreement, and provides an update on the impact of climate change if emissions are not reduced.

COP25 Madrid

COP25, the 25th session of the COP, was held between the 2nd and 13th of December 2019 in Madrid. The conference was characterised by repeated warnings from civil society (NGOs and corporates) on emerging evidence and scientific consensus on climate change risk. Specifically, it was noted that there are only c. ‘10 years left’ before the opportunity of limiting global warming to 1.5°C is no longer feasible. As such, the only remaining approach to limiting raising global temperatures is a ‘7.6% reduction of global GHG emissions every year between 2020 and 2030, and to reach net zero emissions by 2050’. However, consensus was not achieved between States on finalising the operating rules of the Paris Agreement and to ensure that it became operational by 2020. Three issues which emerged between States from the COP25 are summarised below:

- There was no uniform consensus between States to raise countries’ climate ambitions, e.g. to make increased commitments in light of growing climate change data. Some States were opposed to imposing any obligation on countries to submit enhanced pledges next year, arguing it should be each country’s own decision. All states were required to submit a

review of their commitments for COP 26 in 2020. At the current level of climate targets, within a decade, the objective of the Paris Agreement will no longer be achievable;

- There was no agreement on finalising Article 6, the foundations for international cooperation to combat climate change. The aim was to establish the rules for new international mechanisms for financing and transferring GHG emission reductions; and
- There was no agreement on financing (Green Climate Fund); specifically, relating to both loss and damage caused by climate change.

Despite the lack of consensus on the above challenges, the COP25 did achieve more limited success with regard to the introduction of the “*San Jose Principles for High Ambition and Integrity of International Carbon Markets*”, which sets out the framework on which a robust carbon market should be built. These principles include, but are not limited to:

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

These principles were supported by 23 EU, including Ireland, and Latin American countries, 5 no. pacific islands and 2 no. countries in the Caribbean.

COP26 Glasgow

COP26 took place in Glasgow, Scotland between the 31st October and 12th November 2021. The summit was centred around the fact that “*climate change is the greatest risk facing us all.*” The UK, as hosts for the summit, developed a ten point plan to deliver a green industrial revolution, seeking to lead the world in tackling and adapting to climate change.

The key items COP26 sought to achieve are:

- Secure global net zero by mid-century and keep 1.5 degrees within reach
- Adapt to protect communities and natural habitats
- Mobilise finance
- Work together to deliver on the said goals and rise to the challenges of climate crisis

All world leaders at the summit confirmed the need to urgently address the gaps in ambition and work together to achieve climate action.

The summit highlighted that the Paris Agreement is working, with leaders outlining national targets and efforts to further reduce emissions. There was a clear commitment to working together to achieve climate aims, with significant announcements including:

- “Over 40 leaders joined the Breakthrough Agenda, a 10-year plan to work together to create green jobs and growth globally, making clean technologies and solutions the most affordable, accessible and attractive option before 2030 – beginning with power, road transport, steel, hydrogen and agriculture.
- Over 120 countries covering more than 90% of the world’s forests endorsed the Glasgow Leaders’ Declaration on Forests & Land Use committing to work collectively to halt and reverse forest loss and land degradation by 2030, backed by the biggest ever commitment of public funds for forest conservation and a global roadmap to make 75% of forest commodity supply chains sustainable.

- A Just Energy Transition Partnership was announced to support South Africa’s decarbonisation efforts; a powerful example of collaboration between an emerging economy and international partners.
- The launch of the Global Methane Pledge saw over 100 countries committing collectively to reduce global methane emissions by 30% by 2030.”

COP27 Sharm el-Sheikh

COP27 took place in Sharm el-Sheikh from the 6th of November 2022 to the 20th of November. The Conference of the Parties (COP) is a supreme decision-making body of the United Nations Framework Convention on Climate Change (UNFCCC).

The three major topics of COP27 were:

- Closing the emissions gap to keep 1.5°C alive
- Loss and damage
- Climate finance

The summit took place a year after its precedent COP26 summit in Glasgow, Scotland. In Glasgow, the final agreement was delayed due to the stance of China and India, among others, who were not comfortable with the ‘phase out’ of coal wording in the draft text. This led to the watering down of this commitment to a ‘phase down’ of coal use. The hope was that COP27 would work to include further language on coal and fossil fuel reduction efforts and be matched by increased ambition and action to meet agreed pledges. Initial texts represented more serious language than used at COP26 in Glasgow, however, the published final text retains the language of Glasgow, phase down, which does not use any binding language to reduce use and is still only applicable to coal, not oil and gas.

There has been the setting of a workplan for 2023 to help articulate the nature and components of a global collective goal on adaptation and resilience, however in order to achieve this, more work needs to be done by countries, cities and organisations as currently, the numbers on the NDCs don’t add up. Currently, no country has an NDC in place that is able to meet Paris Agreement goals, making net zero by 2050 difficult to envision and 2030 commitments near impossible.

European Green Deal – European Climate Law (2021)

The European Green Deal, initially introduced by the European Commission in December 2019, sets out the ‘blueprint’ for a transformational change of the 27-country bloc from a high- to a low-carbon economy, without reducing prosperity and while improving people’s quality of life, through cleaner air and water, better health and a thriving natural world. The Green Deal is intended to work through a framework of regulation and legislation setting clear overarching targets, e.g. **a bloc-wide goal of net zero carbon emissions by 2050 and a 55% cut in emissions by 2030 (compared with 1990 levels)**. This is a substantial increase compared to the existing target, upwards from the previous target of at least 40% (2030 Climate & Energy Framework), and furthermore, these targets demonstrate the ambition necessary to keep the global temperature increase to well below 2°C and pursue efforts to keep it to 1.5°C as per the Paris Agreement. With regard to the energy sector, the Green Deal focuses on 3 no. key principles for the clean energy transition, which will help reduce greenhouse gas emissions and enhance the quality of life for citizens:

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

The European Climate Law³ writes into law the objectives set out above in the European Green Deal for Europe’s economy and society to become climate-neutral by 2050. Climate neutrality by 2050 means achieving net zero greenhouse gas emissions for EU countries as a whole, mainly by cutting emissions, investing in green technologies and protecting the natural environment. The Climate Law includes:

- A legal objective for the Union to reach climate neutrality by 2050;
- An ambitious 2030 climate target of at least 55% reduction of net emissions of greenhouse gases as compared to 1990, with clarity on the contribution of emission reductions and removals;
- A process for setting a 2040 climate target, taking into account an indicative greenhouse gas budget for 2030-2050 to be published by the Commission;
- A commitment to negative emissions after 2050;
- The establishment of European Scientific Advisory Board on Climate Change, that will provide independent scientific advice;
- Stronger provisions on adaptation to climate change; and
- Strong coherence across Union policies with the climate neutrality objective

The law aims to ensure that all EU policies contribute to this goal and that all sectors of the economy and society play their part. All 27 no. EU Member States have committed to turning the EU into the first climate neutral continent by 2050. One third of the 1.8 trillion-euro investments from the NextGenerationEU Recovery Plan, and the EU’s seven-year budget, will finance the European Green Deal. On 14th July 2021, the European Commission adopted a set of proposals⁴ to make the EU's climate, energy, transport and taxation policies fit for reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels. Achieving these emission reductions in the next decade which is crucial to Europe becoming the world’s first climate-neutral continent by 2050 would clearly be assisted by the Proposed Development.

2.2.2 National Policy

Programme for Government (2020)

The Programme for Government 2020 (June 2020) places specific emphasis on climate change, stating that the next ten years are a critical period in addressing the climate crisis, and therefore, a deliberate and swift approach to reducing more than half of Ireland’s carbon emissions over the course of the decade (2020-2030) must be implemented. The programme states that the government are committed to reducing greenhouse gas emissions by an average 7% per annum over the next decade in a push to achieve a net zero emissions by the year 2050.

With regard to energy generation, the Programme notes that the government is committed to the rapid decarbonisation of the energy sector. The Programme states the government’s ongoing support and commitment to take “*the necessary action to deliver at least 70% renewable electricity by 2030.*” While it is noted this has been updated by the 2021 Climate Action Plan, the Programme for Government sets out a range of measures to achieve this target which remain relevant, including:

- Finalise and publish the Wind Energy Guidelines
- Continue EirGrid’s programme ‘Delivering a Secure, Sustainable Electricity System’
- Strengthen the policy framework to incentivise electricity storage and interconnection
- Produce a whole-of-government plan setting out how we will deliver at least 70% renewable electricity by 2030

³ European Climate Law was published in the Official Journal on 9 July 2021 and came into force on 29 July 2021.

⁴ Fit for 55: delivering the EU’s 2030 Climate Target on the way to climate neutrality (July 2021)

The Climate Action and Low Carbon Development (Amendment) Act (2021)

The Climate Action and Low Carbon Development (Amendment) Act 2021, which was signed into law on the 23rd July 2021, legally binds Ireland to achieve net-Zero emissions no later than 2050, and to a **51% reduction in emissions by the end of this decade**. The Act provides the framework for Ireland to meet its international and EU climate commitments and to become a leader in addressing climate change. As indicated by the premise of the legislation, the reduction of emissions is a key proponent of the Climate Action and Low Carbon Development (Amendment) Act 2021 and incorporates the following key provisions:

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

The project represents a significant opportunity to be a nationally important wind energy generator, contributing to the 51% reduction in emissions being sought, which is as outlined above a legally binding requirement. The Proposed Development is therefore considered compliant with the relevant policies and objectives set out at both the European (e.g. European Green Deal) and National tiers of governance in this regard.

Carbon Budgets

The first national carbon budget programme proposed by the Climate Change Advisory Council, approved by Government and adopted by both Houses of the Oireachtas in April 2022 comprises three successive 5-year carbon budgets⁵. The total emissions allowed under each budget are shown in Table 2-1 below.

⁵ Climate Change Advisory Council Carbon Budget Technical Report (October 2021) <https://www.gov.ie/en/publication/9af1b-carbon-budgets/>

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

	2021 – 2025 Carbon Budget 1	2026 – 2030 Carbon Budget 2	2031 – 2035 Provisional Carbon Budget 3
	All Gases		
Carbon Budget (Mt CO ₂ eq)	295	200	151
Annual Average Percentage Change in Emissions	-4.8%	-8.3%	-3.5%
The figures are consistent with emissions in 2018 of 68.3 Mt CO ₂ eq reducing to 33.5 Mt CO ₂ eq in 2030, thus allowing compliance with the 51% emissions reduction target by 2030.			

Report of the Joint Committee on Climate Action - Climate Change: A Cross-Party Consensus for Action (2019)

In March 2019, the Joint Committee on Climate Action Change released a report detailing a cross party consensus for action. The report in its introduction states that “Ireland’s performance in meeting international obligations has to date been poor” (refer to ‘Emissions Projections for Ireland’ below). The Report highlights on-going concern regarding emission projections and growing evidence that Ireland is off track in meeting its 2030 targets under the relevant the EU Directives.

The report states that the transformation of Ireland’s energy system will be required for the country to meet its future 2030 and 2050 GHG emission targets; specifically, in order to reach net zero emissions by 2050, Ireland will be required to fully decarbonise electricity generation. Therefore, there is a clear incentive for developing, and safeguarding, Ireland’s capacity in renewable energies and renewable electricity. Since this report was published, the Climate Action and Low Carbon Development (Amendment) Act 2021 has been enacted and there have been recent progress / future scenario assessments (e.g. EirGrid’s ‘All Island Generation Capacity Statement 2021 – 2030’ (September 2021)).

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

Climate Action Plan 2023

The Climate Action Plan 2023 (‘the CAP’) launched in December 2022, sets out a roadmap to delivery on Ireland’s climate ambition. It aligns with the legally binding economy-wide carbon budgets and sectoral ceilings that were agreed by Government in July 2022 following the Climate Action and Low Carbon Development (Amendment) Act 2021. The Act commits Ireland to a legally binding target of net-zero greenhouse gas emissions no later than 2050, and a reduction of 51% by 2030.

At the time of publication (December 2022), the key sources of Ireland’s greenhouse gas (GHG) emissions include agriculture (33.3%), Transport (15.7%) and Energy (14.4%). Current and future actions require “*the full implementation of measures from Climate Action Plans 2023, and further future Climate Action Plans.*” (emphasis added)

CAP23 sets out indicative ranges of emissions reductions for each sector of the economy. Large-scale deployment of renewables - including onshore wind - is considered ‘critical’ to help decarbonise the power sector. In relation to achieving the sectoral emissions ceiling for the electricity sector the CAP states:

“The proposed pathway includes a massive and rapid build-out of renewable generation capacity (wind and solar power generation technologies) and will also rely on the continued build-out and strengthening of grid infrastructure, the deployment of zero-emissions gas and improved electricity demand management. The decarbonisation of the electricity sector will be an immense challenge as we face a growing demand for electricity and a need to ensure security of supply, while providing support for the decarbonisation of other sectors through the electrification of transport and heat.”

In relation to the generation of electricity, the CAP emphasises the continued role of onshore wind in addressing the decarbonisation of the electricity sector. Under the CAP onshore wind targets of 6GW by 2025 and 9GW by 2030 is set out. An increase in the deployment of renewable energy generation, transformational policies, measures and actions are all called for in the CAP. Achieving further emissions reductions between now and 2030 requires a “*major step up*” across three key measures as follows:

- *Accelerate and increase the deployment of renewable energy to replace fossil fuels;*
- *Deliver a flexible system to support renewables and demand;*
- *Manage electricity demand.*

The CAP acknowledges that “*Ireland accommodates one of the highest global percentages of variable renewable generation on the grid. However, to maximise the output of renewables, the electricity system must increase its flexibility further.*”

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

Ireland’s Greenhouse Gas Emissions Projections (2021 – 2040), June 2022

In June 2022, the EPA published an update on *Ireland’s Greenhouse Gas Emission Projections 2021-2040* using the latest Inventory data for 2020. The report provides an assessment of Ireland’s progress towards achieving its emission reduction targets for 2021 and 2030 as set out under the EU Effort Sharing Decision (ESD) and Effort Sharing Regulation (ESR). Under the Additional Measures scenario, renewable energy is projected to increase up to 78% of electricity generated by 2030 with emissions from the Energy Industry decreasing by 10% per annum from 2021-30. Increased coal use from 2021 and growing energy demand, including from data centres, threaten to negatively impact achievement of National targets, particularly for the first carbon budget period. The key findings set out within the report concerning Ireland’s progress towards these targets, which are summarised below:

2030 Targets: Ireland’s 2030 target under the EU ESR on greenhouse gas reduction is a 30% reduction of emissions compared to 2005 levels by 2030. EPA Projections show that *existing measures* will achieve a reduction of 5% on 2005 levels by 2030, significantly short of the target. However, if measures with the higher ambition (*with Additional Measures*) scenario are implemented, the reduction target can be achieved.

The Report assesses the future emission projections under two scenarios: ‘With Existing Measures’ and ‘With Additional Measures’. The ‘With Existing Measures’ scenario assumes that no additional policies and measures, beyond those already in place by the end of 2019 are implemented. The ‘With Additional Measures’ scenario assumes implementation of the ‘With Existing Measures’ scenario in addition to further implementation of Government renewable and energy efficiency policies and measures, as set out in the CAP. Greenhouse gas emissions projections show total emissions decreasing from 2020 levels by 10.5% by 2030 under the With Existing Measures scenario and by 28% under the With Additional Measures scenario.

The energy sector contributed 14.9% of Ireland’s total emissions in 2020 and is projected to decrease to 10.3% in 2030 (in the With Existing Measures scenario). The key trends underpinning the future progress of the sector under both scenarios are described below (underlined for emphasis):

- With existing measures
 - Emissions from the energy industries sector are projected to decrease by 37.8% from to 8.7 to 5.4 Mt CO₂ eq over the period 2020 to 2030
 - In terms of the renewable energy generated, this scenario projects Ireland reaching approximately 70% of electricity consumption from renewable energy by 2030. Renewable electricity generation capacity is dominated by wind energy.
- With Additional Measures
 - Emissions from the energy industries sector are projected to decrease by 48.9% from 8.7 to 4.5 Mt CO₂ eq over the period 2020 to 2030
 - Assumed that by 2030 renewable energy generation increases to approximately 80% of electricity consumption. This is mainly a result of further expansion in wind energy (comprising 5.0 GW offshore).

In the context of Ireland, and the possible outcomes under the above scenarios, the EPA emphasises the need for ‘urgent implementation’ of all plans, policies and new measures as a response to reducing carbon emissions:

“These latest Projections highlight the pace and scale of action needed to reduce greenhouse emissions in time to contribute to arresting global temperature rise. Implementation has consistently lagged behind planning. The message from the IPCC is that no further delays are possible to avoid the worst climate outcomes.

Urgent implementation of all climate plans and policies, plus further new measures are needed for Ireland to meet the 51% emissions reduction target and put Ireland on track for climate neutrality by 2050.”

While it is clear that progress is on-going, it is also apparent that there are still significant challenges which will need to be overcome if Ireland is to achieve its 2030 emission targets of 51% reduction. With *Additional Measures*, if they are fully implemented, compliance can be achieved with the EU Effort Sharing Regulation target. As decarbonising electricity generation will have a significant positive contribution in achieving Ireland’s emissions it is clear that additional renewable energy production such as that of the Proposed Development must be encouraged and supported if carbon saving targets are to be met.

2.3

Renewable Energy Policy and Targets

Renewable energy development is recognised as a vital component of Ireland’s strategy to tackle the challenges of combating climate change and ensuring a secure supply of energy. Ireland’s import dependency was 66% in 2019, down from an average of 89% between 2001 and 2015, arising from the beginning of production of gas from the Corrib field and increasing use of indigenous renewable energy. Notwithstanding this improvement, the numbers have been rising again since, and Ireland remains one of the most import fuel dependent countries in the EU; In 2020 import dependency was 72%. SEAI’s ‘*Energy in Ireland 2021 Report*’ (December 2020) further expands on the above, noting that ‘*Total indigenous energy production in Ireland reached the highest level ever in 2018 of 5,044 ktoe, but declined to 3,541 ktoe in 2020 due to declining natural gas and peat production.*’ The most significant changes noted in the report in terms of fuels included:

- Natural gas consumption in industry decreased by 1.8% in 2020 and accounted for 43% of industry’s final energy demand.
- Electricity consumption in industry decreased by 6.5% and accounted for 26% of final energy consumption in industry.
- Oil use fell by 4.0% and accounted for 16.5% of industry’s energy use.

- Renewable energy use in industry fell by 1.4% , in 2020 and accounted for 8.6% of industry’s energy use.
- Coal use fell by 3.9% and accounted for 3.5% of the energy share of industry.

Ireland had two mandatory targets for renewable to bet met by 2020, which were set out by the Renewable Energy Directive (RED). The SEAI comments the following in relation to these targets –

‘The first relates to overall renewable energy share (RES), and is commonly referred to as the overall RES target. For Ireland, the overall RES target was for at least 16% of gross final energy consumption (GFC)24 to come from renewable sources in 2020. The actual overall renewable energy share in 2020 was 13.5%, meaning that Ireland did not meet this target. The shortfall to target was equivalent to 3.3 TWh of renewable energy.

The second mandatory target set by the RED relates to the renewable energy used for transport. This is commonly referred to as the RES-T target. The RES-T target was for at least 10% of energy consumed in road and rail transport to come from renewable sources25. The actual RES-T achieved in 2020 was 10.2%, meaning that Ireland did meet this target.’

The projected demand for electricity is clear and to meet that demand viable projects such as the proposed renewable energy development can directly contribute to Ireland’s energy and climate targets.

2.3.1 EU Renewable Energy Policy

The 2030 Climate and Energy Framework (adopted by EU leaders in October 2014) represents the current governance system underpinning EU renewable energy policy. The framework defines EU wide renewable energy targets, which builds on the 2020 climate and energy package:

- A binding commitment at EU level of at least 40% domestic Green House Gas reduction by 2030 compared to 1990;
- An EU wide, binding target of at least 27% renewable energy by 2030; and
- An indicative EU level target of at least 27% energy efficiency by 2030.

The European Commission published its proposal for an Effort Sharing Regulation on the allocation of national targets for greenhouse gas emissions for the period 2021-2030 in May 2018. The Effort Sharing legislation forms part of a set of policies and measures on climate change and energy that will help move Europe towards a low-carbon economy and increase its energy security. Under the current Regulation, the national targets will collectively deliver a reduction of around 10% in total EU emissions from the sectors covered by 2020 and of 30% by 2030, compared with 2005 levels.

The proposal implements EU commitments under the Paris Agreement on climate change (COP21), discussed above in Section 2.1.1, and marks an important milestone in the allocation to Member States of a package of climate targets formally adopted as part of the 2030 Climate and Energy Framework.

The revised Renewable Energy Directive (EU) 2018/2001 came into force in December 2018. It establishes a binding EU target of at least 32% for 2030 with a review for increasing this figure in 2023. The revised Directive sets a 2030 target of 32.5% energy from renewable sources with a potential upward revision in 2023.

The European Green Deal was launched in December 2019 and proposes to increase the binding target of renewable sources in the EU’s energy mix from 32% to **40% by 2030** via amendments to the Renewable Energy Directive (Renewable Energy Directive) as per the ‘Fit for 55’ package (July 2021)⁶. This supports Member States in making the most of their cost-effective renewable energy potential across sectors through a combination of sectoral targets and measures. It aims at making the energy system cleaner and

⁶ <https://www.consilium.europa.eu/en/policies/eu-plan-for-a-green-transition/>

more efficient by fostering renewables-based electrification and, in sectors such as industry and transport where this is more difficult, it will promote the uptake of renewable fuels.

REPowerEU Plan

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

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

With full implementation of the measures in REPowerEU plan, at least 155 bcm of fossil gas use could be removed, which is equivalent to the volume imported from Russia in 2021. Nearly two thirds of that reduction can be achieved within a year. A part of this plan includes *'Speeding up renewables permitting to minimise the time for roll-out of renewable projects and grid infrastructure improvements'*. This will make the sector more efficient and reach the set goals faster. As such, it is submitted that the Proposed Development is strongly supported by EU energy policy.

Energy Roadmap 2050

The Energy Roadmap 2050 was published by the European Commission in 2011 and analyses the transition of the contemporary energy system in ways that would be compatible with the greenhouse gas reductions targets as set out in the Renewable Energy Directive (Directive 2009/28/EC) while also increasing competitiveness and security of supply. To achieve these targets and objectives, the Roadmap states that significant investments will need to be made in new low-carbon technologies and renewable energy, e.g. wind energy infrastructure, energy efficiency and grid infrastructure. Five main routes are identified to achieving a more sustainable, competitive and secure energy system in 2050:

- > High Energy Efficiency;
- > Diversified Supply Technologies;
- > High Renewable Energy Sources;
- > Nuclear energy; and
- > Carbon capture and storage.

The analysis found that decarbonising the energy system is technically and economically feasible. The Roadmap notes that all scenarios show the biggest share of energy supply technologies in 2050 comes from renewables. In this regard, it should be noted that the Climate Change Advisory Council states within their 2020 Annual Review (September 2020) that, *"while the share of renewable electricity generation, particularly wind, is increasing [in Ireland], the [overall] pace of decarbonisation of the [electricity generation] sector needs to accelerate"*, as it is not compatible with a low-carbon transition to 2050. As such, a major prerequisite for a more sustainable and secure energy system is a higher share of renewable energy up to and beyond 2030 to 2050. Each of the scenarios assumes in the analysis that increasing the share of renewable energy and using energy more efficiently are crucial, irrespective of the particular energy mix chosen.

Progress on Targets

The SEAI *Energy in Ireland 2022* was published in December 2022 and set out the most recent updates to Ireland’s progress towards its binding European and National renewable energy targets. Based on confirmed 2020 data, the report found that Ireland failed to meet the EU overall renewable energy supply target of 16% for 2020. Although Ireland committed to reducing its CO₂ emissions by 4.8% per annum from 2021- 2025 under the first carbon budget, energy related emissions were instead up by 5.4% in 2021.

The SEAI report illustrates (Figure 6) the summary of sectoral ceilings within the first two carbon budgets, over the periods 2021-2025 and 2026-2030 – copied below in Figure 2-1.

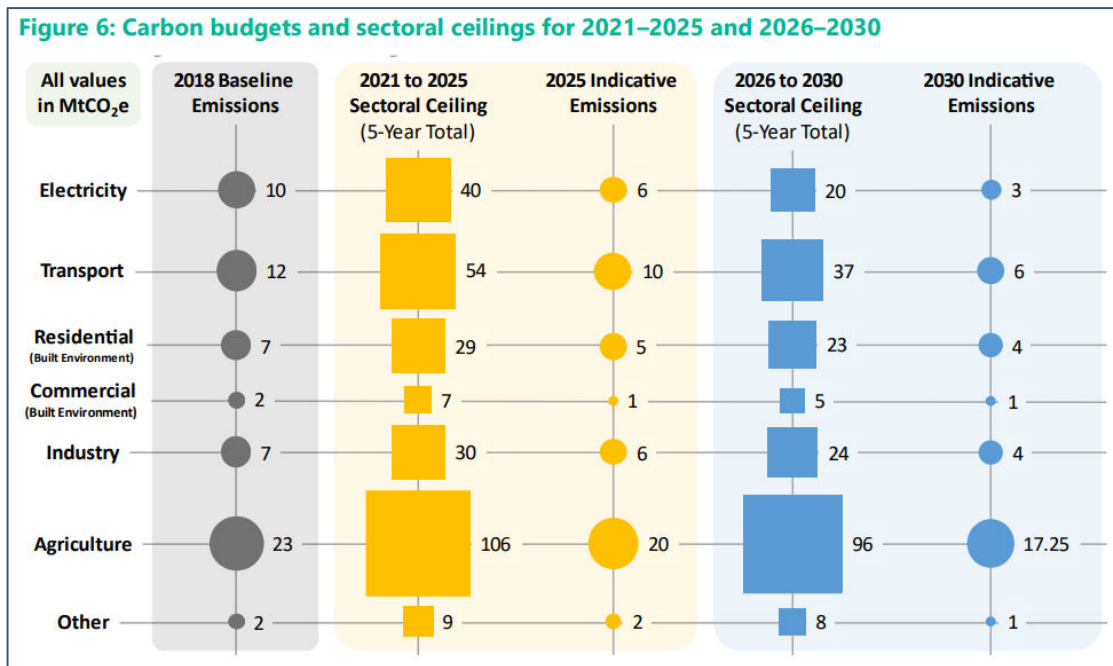


Figure 2-1: Carbon Budgets and Sectoral Ceilings for 2015-2025 and 2026-2030 (SEAI Energy in Ireland 2022)

A guideline trajectory the electricity sector’s emission ceiling in both carbon budgets is shown above in Figure 2-1. The data shows that “*electricity emissions were ‘on trajectory’ in 2021 (10.3 MtCO₂), despite the greater dependence on coal- and oil-fired electricity generation. However, our provisional estimate for electricity emissions in 2022 (10.8 MtCO₂) is higher than the guideline trajectory (9.0 MtCO_{2e}). This is due to an increase in electricity demand for 2022, not all of which could be supplied through renewable electricity, and the significant pace of annual reductions (-12.6% down on each previous year) needed to satisfy electricity’s sectoral emission ceiling.*”

The report confirms that wind accounted for 84% of renewable electricity generated in 2021 having 4339MW of installed wind capacity in 2021. Up to September 2022, the report confirmed 78MW of added wind capacity.

Security of supply is a focus in the report, noting “*Ireland’s import dependency [of energy] has been increasing steadily, as the output from the Corrib gas field reduces faster than we are adding new renewable sources.*” In 2021 Ireland’s import dependency for energy was 80%; ranked eighth highest of the 27 Member States in terms of import dependency in 2020, the last year in which full data was available.

In order to reduce Ireland’s emissions there is a need to increase the renewable share of electricity, heat and transport. Up until 2020, renewable energy targets and results were set and calculated under the rules and methodologies of the first EU Renewable Energy Directive (REDI) however, from 2021 onwards, renewable results must be calculated under the REDII methodology. This updated Directive contains stricter requirements on the countability of biomass, biogas, and biofuels, as they relate to our renewable energy share (RES) results. The second EU Renewable Energy Directive (REDII) continues to promote

the growth of renewable energy and set renewable energy share (RES) targets out to 2030. The changes in criteria and caps under REDII change how the RES results in 2021 are calculated compared to 2020, even where there is little to no change in the underlying renewable energy:

	2020	RES 2020 Note	2021*	Note	New 2030 Target
Overall RES	13.6%	Ireland failed to meet its target of 16%	12.5%	Drop is almost entirely due to the shift in the REDII methodology	34.1%
RES-T (Transport energy from renewable energy sources)	10.2%	Ireland achieved its target of 10%	4.3%	Drop is almost entirely due to the shift in REDII methodology.	14%
RES-E (Electricity from renewable energy sources)	39.1%	Ireland failed to meet its target of 40%	36.4%	RES-E fell by 2.6% to 36.4% with over half this drop due to the shift in the REDII methodology and exclusion of some biomass; the remaining drop was due to reduced renewable electricity generation due to less wind in 2021.	70%
RES-H (Heat from renewable energy sources)	6.3%	Ireland failed to meet its target of 12%	5.2%	This decrease in RES-H is mainly due to the shift in REDII methodology and the introduction of new sustainability and verification criteria for biomass fuels.	24%

**calculated under the new REDI methodology*

REDII introduced a binding EU-wide target for overall RES of 32% in 2030 and requires Member States to set their national contributions to the EU-wide target. As per the National Energy and Climate Plan (NECP) 2021-2030, Ireland’s overall RES target is 34.1% in 2030.

The second mandatory target set by the RED related to the renewable energy share in transport sector. This is commonly referred to as the RES-T target. The 2020 RES-T target was for at least 10% of energy consumed in road and rail transport to come from renewable sources. The actual RES-T achieved in 2020 was 10.2%, meaning that Ireland did meet this target. REDII sets a new RES-T target of 14% by 2030.

The RES-E target to 2030 of 70% ensures that “renewable electricity continues to form the backbone of our renewable energy use for the coming decade and beyond.”

The Climate Advisory Council (CCAC) notes within their *2022 Annual Review* that urgent implementation of the measures identified in the ⁷CAP 2021 and identification of further new measures would be needed to reach national emission reduction targets in the electricity sector. The CACC stress the importance of reducing emissions in the electricity sector given the reliance of other sectors on the successful decarbonisation of the electricity sector.

⁷ CAP23 was not yet published when the CCAC 2022 Annual Review was published

EirGrid's recent analysis presented in 'All Island Generation Capacity Statement 2022 – 2031' (October 2022) found that the existing generation capacity is poor. Some generation capacity, due to close in September 2023, have submitted notices that they will not be available throughout 2022 and 2023. This represents 590 MW (rated) that will be unavailable to the national grid. Furthermore, a sizable portion (364MW) of the forecasted new generation has failed to materialise, with developers terminating their capacity market contracts. These issues combined with existing social and economic growth driving electricity demand upwards means that the new generation capacity, especially renewable electricity, is urgently required. The scale of the capacity issue is clear, with significant capacity deficits forecasted across all scenarios for the remainder of the decade. In this context, the importance of wind energy becomes more apparent as it is estimated that 1 MW of wind capacity can provide enough electricity to supply approximately 650 homes⁸. Accordingly, the Proposed Development will serve to only contribute to meeting this increasing electricity demand.

With regard to the requirements needed to achieve the ambitious targets set in the Governments Climate Action Plan 2023, it is stated that:

“The electricity sector has a ceiling of 40 MtCO₂eq. for the first budgeting period (2021-2025), equating to an average of 8 MtCO₂eq. per annum. As emissions in 2021 were 9.98 MtCO₂eq., electricity will need to achieve average annual emissions of circa 7.5 MtCO₂eq. from 2022 to 2025.

At a time when the energy system is under severe pressure to ensure security of supply, amid projections of rapid electricity growth over the coming decade, the electricity sector has been set one of the smallest carbon budget allocations and the steepest decline (-75%) of all sectors. The scale of the challenge to meet the carbon budget programme is immense and requires policies to be moved from an 'end of decade' target trajectory to a 'remaining carbon budget' target.“

In relation to the scale of the challenge, the CAP calls for “a major acceleration and increase in onshore wind turbines across the country.” To accelerate renewable electricity generation a target of 9GW by 2030 of onshore wind is set, framed in the context of ensuring that renewable energy generation projects and associated infrastructure are considered to be “in the overriding public interest.”

EirGrid have also released their *Strategy 2020-2025: Transform the Power System for Future Generations* which is driven by climate change and the need to transform the electricity sector. Currently, the electricity grid can operate with up to 65% of renewable power but by 2030 this must increase to 95%. SEAI's National Energy Projections to 2030 notes that wind energy deployment has “made the most significant contribution to RES-E to date. The historic build rate (2005-2010) was 180MW per year. Since 2010 the build rate has increased to an average of over 200MW per year. In 2017 the installed capacity increased by 335MW to just over 3.3GW total installed capacity.” Furthermore, “Post 2020, as electricity demand continues to grow at an anticipated rate of 3% per annum, increasing levels of deployment will be needed just to maintain the share achieved in 2020.”

Ireland faces significant challenges through efforts to meet its renewable energy targets, EU targets for renewable energy by 2030 and its commitment to transition to a low carbon economy by 2050. The proposed Sheskin South wind energy development will aid Ireland in addressing these challenges as well as addressing the country's over-dependence on imported fossil fuels. Through the production of renewable energy which will connect to the national grid the Proposed Development has the potential to be a major contributor to meeting the country's binding targets.

⁸ <https://www.iwea.com/about-wind/faqs>

National Policy on Renewable Energy

White Paper on ‘Ireland’s Transition to a Low Carbon Energy Future’ 2015 - 2030

On 12th May 2014, the Green Paper on Energy Policy in Ireland was launched which marked the start of a public consultation process on the future of Ireland’s energy policy over the medium to long-term. The Department of Communications, Climate Action & Environment acknowledged that energy is an integral part of Ireland’s economic and social landscape and that “*a secure, sustainable and competitive energy sector is central to Ireland’s ability to attract and retain Foreign Direct Investment and sustain Irish enterprise. The three key pillars of energy policy are to focus on security, sustainability and competitiveness*”.

Following on from an extensive consultation process, a Government White Paper entitled ‘*Ireland’s Transition to a Low Carbon Energy Future 2015-2030*’ was published in December 2015 by the (then) Department of Communications, Energy and Natural Resources (“DCENR”). This Paper provides a complete energy update and a framework to guide policy up to 2030. The Paper builds upon the White Paper published in 2007 and takes into account the changes that have taken place in the energy sector since 2007.

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

In this White Paper, the DCENR acknowledges that onshore wind is one of the cheapest forms of renewable energy in Ireland, stating that:

“Onshore wind continues to be the main contributor (18.2% of total generation and 81% of RES-E in 2014). It is a proven technology and Ireland’s abundant wind resource means that a wind generator in Ireland generates more electricity than similar installations in other countries. This results in a lower cost of support.”

National Energy Security Framework

More recently, the National Energy Security Framework (DECC, April 2022) highlights clearly the impacts the Russian invasion of Ukraine and the resulting war has had on Europe’s energy system. The resulting decision by the European Union to phase out the import of Russian gas, oil and coal has brought to the fore the importance of security of supply and how energy policy is designed for long-term resilience. It takes account of the need to decarbonise society and economy, to reduce Ireland’s emissions by 51% over the decade to 2030 and reach net zero emissions by 2050. According to the SEAI’s Energy in Ireland (2020) report, oil accounts for 54% of Ireland’s primary energy requirement making it one of the highest rate of oil dependency in the EU. The International Energy Agency, of which Ireland is a member country, includes a 10-point plan to cut oil use which calls for an acceleration in the deployment of wind and solar projects. Ireland’s response per the Framework is set out over three themes:

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

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

2.4 Planning Policy Context

2.4.1 National Policy

2.4.1.1 National Planning Framework: Project Ireland 2040

The National Planning Framework (NPF), published in February of 2018, forms the top tier of the national planning policy structure which establishes the policy context for the Regional Spatial and Economic Strategies (RSES) and local level development plans. In an effort to move away from developer led development to one informed by the needs and requirements of society up to 2040, a number of objectives and policies have been put in place in order for the country to grow and develop in a sustainable manner.

- Developing a new region-focused strategy for managing growth;
- Linking this to a new 10-year investment plan, the Project Ireland 2040 National Development Plan 2018-2027;
- Using state lands for certain strategic purposes;
- Supporting this with strengthened, more environmentally focused planning at local level; and
- Backing the framework up in law with an Independent Office of the Planning Regulator.

The NPF notes that the population of Ireland is projected to increase by approximately 1 million people by 2040 which will result in a population of roughly 5.7 million. This population growth will place further demand on both the built and natural environment. In order to strengthen and facilitate more environmentally focused planning at the local level, the NPF states that future planning and development will need to:

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

A key focus throughout the NPF is the fostering of a transition toward a low carbon, climate-resilient society. In this regard, one of the stated key elements of the NPF is an Ireland which has a secure and sustainable renewable energy supply and facilitates the ability to diversify and adapt to new energy technologies. Key features identified in the NPF to facilitate the transition towards a low carbon energy future include:

- A shift from predominantly fossil fuels to predominantly renewable energy sources.
- Increasing efficiency and upgrades to appliances, buildings and systems.
- Decisions around development and deployment of new technologies relating to areas such as wind, smart grids, electric vehicles, buildings, ocean energy and bio energy.

- Legal and regulatory frameworks to meet demands and challenges in transitioning to a low carbon society.

Relevant to the subject development, the **National Strategic Outcome 8** (*Transition to Sustainable Energy*), notes that in creating Ireland’s future energy landscape, new energy systems and transmission grids will be necessary to enable a more distributed energy generation which connects established and emerging energy sources, i.e. renewables, to major sources of demand. The successful transition to a low-carbon power system will depend on the pillars of 1) *Sustainability*, 2) *Security of supply* and 3) *Competitiveness*. A common theme underpinning these pillars is the need for a fit-for-purpose transmission and distribution energy network. Specifically, the NPF states that reinforcement of the distribution and transmission network to facilitate planned growth and distribution of a more renewables focused source of energy across the major demand centres, e.g. the functional purpose of the extant grid connection. Ireland’s national energy policy under **Objective 55** aims to ‘*promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050*’. The NPF aims to ensure that decisions that are made today meet our future needs in a sustainable manner.

“The manner in which we plan is important for the sustainability of our environment. Our planning system has influence across a wide range of sectors, both directly and indirectly and interacts with many common issues related to effective environmental management, including water services, landscape, flood risk planning, protection of designated sites and species, coastal and marine management, climate mitigation and adaptation, and land use change.”

An overarching objective of the NPF is to foster a transition toward a low carbon, climate-resilient society, which reflects the policy ethos established at the European level of governance (e.g. climate change and renewable energy targets – Section 2.1). In this regard, one of the key themes of the NPF is the realisation of an Ireland which has a secure and sustainable renewable energy supply and the ability to diversify and adapt to new energy technologies. The NPF references the National Climate Policy Position which established the fundamental objective of achieving transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050. The NPF emphasises that rural areas have a strong role to play in securing a sustainable renewable energy supply for the country and acknowledges that *“rural areas have significantly contributed to the energy needs of the country and continue to do so”*. In this regard, the NPF states:

“In meeting the challenge of transitioning to a low carbon economy, the location of future national renewable energy generation will, for the most part, need to be accommodated on large tracts of land that are located in a rural setting, while also continuing to protect the integrity of the environment”.

The NPF acknowledges that greenhouse gas emissions from the energy sector must be reduced by at least 80% by 2050 when compared to 1990 levels while ensuring a secure supply of energy exists. New energy systems and the maintenance / safeguarding of existing grid assets will be necessary for a more distributed, renewables focused energy system required to harness Ireland’s considerable indigenous energy sources and *“connect the richest sources of that energy to the major sources of demand”*.

In regard to the above, it is clear that the provision of new renewable energy generation is in line with the aims and objectives of the NPF which seeks to transition to a low carbon economy.

2.4.1.2 National Development Plan 2021 – 2030

The National Development Plan 2021 – 2030 (NDP) was published on 4th October 2021 and sets out the major public investment projects identified by Government which are to play a significant role in addressing the opportunities and challenges faced by Ireland over the coming years such as Covid-19, Brexit, housing, health, population growth, and most relevant to the subject development, climate change. It is stated that the NDP 2021 – 2030 will be the *‘largest and greenest ever delivered in Ireland’*, and in this regard, the NDP highlights that extensive consultation was undertaken to ensure that the plan

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

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

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

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

One of the NDP’s strategic climate priorities is the need for low-carbon, resilient electricity systems; specifically, the plan commits to increasing the share of renewable electricity up to 80% by 2030. This is characterised by the NDP as an ‘*unprecedented commitment to the decarbonisation of electricity supplies*’ which, if compared to the Climate Action Plan AP 2023 and the objective to increase the proportion of renewable electricity to up to 80% by 2030 and a target of 8 gigawatt (GW) from onshore wind, is certainly ambitious and an explicit driver for the deployment of new renewable generators and the safeguarding / maintenance of existing assets, e.g. the subject development. It is noted that the reliability of electricity supplies will also be strengthened through investment in the electricity transmission and distribution grid. The focus of investment in regulated network infrastructure is to contribute to a long-term, sustainable and competitive energy future for Ireland.

2.4.2 Regional Policy

2.4.2.1 Northern and Western Regional Spatial and Economic Strategy

The Northern and Western Regional Assembly (NWRA) has a recognised leadership role in setting out regional policies and coordinating initiatives which support the delivery and implementation of the National Planning Framework (NPF). The primary vehicle for this is the preparation and implementation of the Regional Spatial and Economic Strategy (RSES).

The North and Western region is characterised by the RSES as having ‘*a unique natural endowment of ample carbon-neutral, energy supplies*’ such as wind. Specifically, the Western Region is stated as being ‘*particularly rich*’ in renewable energy resources dispersed across the region, particularly North Mayo. The RSES acknowledges that the region has a pivotal role in delivering a successful transition to Ireland’s proposed low carbon economy with huge potential for growth in renewables. As such, there is ‘*still significant potential*’ for all new renewable energy outputs to the grid. In order to facilitate the growth of renewables within the region, the RSES notes that the NWRA aims to encourage stakeholders, i.e. industry, commercial etc., to be the first to facilitate new opportunities and concentrate on possibilities to further advance renewable energy generation and use.

These strategic aims are captured in Policy Objectives 4.16, 4.17 and 4.18:

- **RPO 4.16:** *The NWRA shall co-ordinate the identification of potential renewable energy sites of scale in collaboration with Local Authorities and other stakeholders within 3 years of the adoption of the RSES. The identification of such sites (which may*

extend to include energy storage solutions) will be based on numerous site selection criteria including environmental matters, and potential grid connections.

- **RPO 4.17:** *To position the region to avail of the emerging global market in renewable energy by stimulating the development and deployment of the most advantageous renewable energy systems, including:*
 - *Stimulating the development and deployment of the most advantageous renewable energy systems;*
 - *Raising awareness and public understanding of renewable energy and encourage market opportunities for the renewable energy industry to promote the development and growth of renewable energy businesses; and*
 - *Encourage the development of the transmission and distribution grids to facilitate the development of renewable energy projects and the effective utilisation of the energy generated from renewable sources having regard to the future potential of the region over the lifetime of the Strategy and beyond.*
- **RPO 4.18:** *Support the development of secure, reliable and safe supplies of renewable energy, to maximise their value, maintain the inward investment, support indigenous industry and create jobs*

As indicated above, there is a clear precedent within the region to identify and capitalise on emerging opportunities associated with the transition to a decarbonised economy such as renewable energy generation. It should be noted, however, that the existing transmission network within the region is predominantly 110 kV with very little higher capacity 220 kV and 400 kV transmission infrastructure. As such, the RSES endorses the future development of the grid in order to safely facilitate more diverse power flows from surplus regional generation and also to facilitate future growth in electricity demand:

- **RPO 8.3:** *The Assembly support the necessary integration of the transmission network requirements to allow linkages with renewable energy proposals at all levels to the electricity transmission grid in a sustainable and timely manner.*
- **RPO 8.4:** *That reinforcements and new electricity transmission infrastructure are put in place and their provision is supported, to ensure the energy needs of future population and economic expansion within designated growth areas and across the Region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs. Ensure that development minimises impacts on designated areas.*

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

2.4.3 Local Policy

2.4.3.1 Mayo County Development Plan 2022 - 2028

The Mayo County Development Plan 2022-2028 (the CDP) was formally adopted by Local Members at a special meeting on the 29th June 2022. The Plan came into effect on the 10th of August 2022. A Draft Ministerial Direction was issued to the Planning Authority in relation to the Development Plan, however, there are no policies or objectives relevant to the Proposed Development affected by the Draft Direction. The CDP provides the framework within which the decision on the planning application is made.

The policies and objectives set out within the CDP have maintained strong linkages with the key aims and themes set out within the previous development plan. Climate change is again emphasised as one of the greatest global challenges with Mayo County Council acknowledging that continual action is needed for Mayo to become a low carbon and climate resilient county. The significance of climate change and

the need for continued support / investment within renewable energy generation as part of the county’s broader decarbonisation strategy is captured within the strategic of the CDP’s Climate Action and Renewable Energy Chapter:

*“The strategic aim of this chapter is to transition to a low carbon and climate resilient county, with an emphasis on reduction in energy demand and greenhouse gas emissions, through a combination of effective mitigation and adaptation responses to climate change; in addition to **maximising the opportunities to become a national leader in renewable energy generation**, whilst increasing the resilience of our Natural and Cultural Capital to climate change by planning and implementing appropriate adaptation measures”.*

Relevant to the Sheskin South Wind Farm project, the CDP maintains the current ethos that the provision of a safe, secure and reliable electricity supply is a critical component necessary to sustain economic growth in Co. Mayo and the broader region. In this regard, it is noted that Mayo County Council has been a leader in the development of renewable energy and will endeavour to play its part in promoting more sustainable renewable electricity generation. In the context of wind energy, the CDP states that the county has *“enormous wind resource with the potential to underpin an entire new economy in the county”* as evident by its current wind energy generation capacity of 266MW (Q1 2020), which is c. 6% of Ireland’s overall wind energy production.

The development of renewable energy sources is central to the overall energy policy in Ireland. In setting out how the new iteration of the county development plan will contribute to realising overall national targets on renewable energy, the CDP indicates renewable energy target for the county over the next six years;

*“In setting a realistic deliverable target for a county with a high wind potential like Mayo, a **minimum target of 600MW** over the plan period is considered achievable. The target would meet the energy demands of existing households in Mayo, as well as the proposed additional households for the county set out in the Core Strategy Table (Chapter 2). This renewable energy target for Mayo may need to be revised over the lifetime of the Plan to ensure alignment with the Northern and Western Regional Assembly’s forthcoming Renewable Energy Strategy.”*

The CDP states that the county generates 266MW (Q1 2020) from 15 wind farms, which is approximately 6% of Ireland’s overall wind energy production. It is important to highlight that the above minimum 600MW target is not exclusive to wind energy but all potential renewable energy streams such as solar, marine, geothermal and etc. Mayo County Council did not review Mayo County Council’s Renewable Energy Strategy as part of the county development plan review process but it may be further revised during the life of the plan in accordance with future legislative guidelines, e.g. the RSES and implementation of RPO 4.16 (Regional Renewable Energy Strategy).

Table 2-1 below sets out the relevant policies and objectives within the CDP which currently support the continued investment within renewable / wind energy generation in County Mayo.

Table 2-2 Mayo County Development Plan 2022 – 2028 – Climate Action – Renewable Energy Policies / Objectives

Climate Action		Renewable Energy	
MCDP 2022-2028 Policies	Objectives	Policies	Objectives
CAP 1 - To support and enable the implementation and achievement of European and national objectives for climate adaptation and mitigation as detailed in the following documents, taking into account other provisions of the Plan (including those relating to land use planning, energy, sustainable mobility, flood risk management and drainage),	CAO 1 - To support and advance the provision of renewable energy resources and programmes in line with the Government’s National Renewable Energy Action Plan (NREAP), the	REP 1 - To support Ireland’s renewable energy commitments outlined in national policy by facilitating the development and exploitation of a range of renewable energy sources at suitable locations within the county, where such	REO 1 - To co-operate with the Northern and Western Regional Assembly in identifying Strategic Energy Zones as areas suitable for larger, energy generating projects,

Climate Action		Renewable Energy	
MCDP 2022-2028 Policies	Objectives	Policies	Objectives
including the Climate Action Plan (2019 and any subsequent versions).	Governments’ Energy White Paper “Ireland’s Transition to a Low Carbon Energy Future” (2015-2030) and any other relevant policy adopted during the lifetime of this plan.	development does not have a negative impact on the surrounding environment (including water quality), landscape, biodiversity or local amenities to ensure the long term sustainable growth of the county	community and micro energy production, whilst ensuring environmental constraints and a regional landscape strategy are considered.
CAP 4 - To support local, regional, national and international initiatives for climate adaptation and mitigation and to limit emissions of greenhouse gases through energy efficiency and the development of renewable energy sources, which make use of all natural resources, including publicly owned lands, in an environmentally acceptable manner		REP 3 - To actively encourage and support the sustainable development, renewal and maintenance of energy generation infrastructure in order to maintain a secure energy supply, while protecting the landscape, archaeological and built heritage and having regard to the provisions of the Habitats Directive.	REO 6 - To ensure all renewable energy proposal comply with the provisions of the Mayo County Council Renewable Energy Strategy 2011-2022 (or as updated).
CAP 6 - To support the transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050, by way of reducing greenhouse gases, increasing renewable energy, and improving energy efficiency and supporting nature-based solutions to climate adaptation and mitigation that provides co-benefits		REP 6 - To work with relevant stakeholders and industry to establish Mayo as a centre of excellence for renewable energy research and development activities	REO 7 - To commence the review of the Mayo County Renewable Energy Strategy 2011-2022 within one year of adopting this plan and update as required in accordance with future legislative guidelines and consistency with the provisions of RPO 4.16 and RPO 5.2(b) of the RSES, 2020-2032.
CAP 9 - To support Ireland’s renewable energy commitments outlined in national policy by facilitating the development and exploitation of all appropriate renewable energy sources at suitable locations within the county, where such development does not have a negative impact on the surrounding environment (including water quality), landscape, biodiversity or local amenities, so as to provide for further residential and enterprise development within the county		REP 7 - To promote the harnessing of wind energy to contribute toward decarbonising County Mayo, including new emerging by-product markets.	REO 8 - To encourage the development of wind energy, in accordance with Government policy, and having regard to the Landscape Appraisal of County Mayo and the Wind Energy Development Guidelines (2006) and Mayo Renewable Energy Strategy, or any revisions there of or future guidelines, and ensure consistency

Climate Action		Renewable Energy	
MCDP 2022-2028 Policies	Objectives	Policies	Objectives
			with the provisions of RPO 4.16 and RPO 5.2(b) of the RSES (2020-2032).

The CDP states that upgrading of the transmission network will facilitate power flows from both renewable and conventional sources to maximise the use of existing power corridors. Forthcoming projects such as the North Connacht 110 kV upgrade may provide additional capacity for renewable energy from the North West to connect to the grid by reinforcing the electricity network, which will support Mayo County Council’s aim to enhance the attractiveness of the county as a place to live, work and invest.

The following policies and objectives are considered relevant to Sheskin South Wind Farm national grid connections:

- **INP 21** - To support the provision of high-quality, electricity infrastructure and development of an enhanced electricity supply, to serve the existing and future needs of the county and to facilitate new transmission infrastructure projects, including the delivery and integration of renewable energy proposals to the electricity transmission grid in a sustainable and timely manner, whilst seeking to minimise any adverse impacts on local communities and protect and maintain bio-diversity, wildlife habitats, scenic amenities, including protected views and nature conservation;
- **INO 38** - To ensure the provision, where feasible, of electricity cables located underground;
- **INO 39** - To seek the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity transmission grid, in a sustainable and timely manner.

As demonstrated above, the Sheskin South Wind Farm project is broadly consistent with the overall International, National and Regional policy objectives to increase deployment of renewable energy resources in the context of climate change, climate mitigation, renewable energy targets and sustainability as referenced in earlier sections this report.

2.4.3.2 Mayo Renewable Energy Strategy 2011 - 2020

The Renewable Energy Strategy (RES) for County Mayo 2011-2020 (2011) sets out guidance designed to allow County Mayo to both contribute to meeting the national legally binding targets while also capitalising on those opportunities associated with the generation and harnessing of renewable energy in a sustainable manner. The RES was not revised as part of the MCDP, however, Objective REO 7 clearly indicates that the review of the RES will commence within one year of adaptation of the new CDP.

The RES’s vision for Mayo’s renewable development strategy is established on the principle that the provision of energy through renewables must take place in a sustainable manner in order to protect the County’s natural amenity and local economies dependent on these assets, e.g. tourism, as reproduced below:

“The renewable energy development vision for County Mayo is to harness the energy and economic potential of County Mayo presented by renewable technologies in order to provide benefits for both local communities and the global environment. In doing so, the elements of the natural, cultural (architectural and archaeological) and landscape heritage that define Mayo for local people and visitors alike will be protected. It is recognised, however, that change is an integral part of cultural heritage and that in order for communities and businesses to thrive Mayo needs new developments. Renewable energy projects will, therefore, be developed in ways that protect the integrity of environmentally designated sites; maximise local and regional benefits; and minimise or avoid negative impacts on the environment and society.”

Lands classified under the RES's tiered strategic wind energy strategy are considered '*the most appropriate for renewable energy developments*'. The definitions of the on-shore wind energy classifications, as per the Mayo Renewable Energy Strategy 2011-2020 are outlined below –

- **Priority Areas** are areas which have secured planning permission and where on shore wind farms can be developed immediately.
- **Tier 1 – Preferred (Large Wind Farms)** are areas in which the potential for large wind farms is greatest.
- **Tier 1 – Preferred (Cluster of Turbines)** are areas identified as being most suitable for smaller clusters of wind turbines (clusters of up to three to five turbines depending on site conditions and visual amenity).
- **Tier 2 – Open for Consideration** identifies areas which may be considered for wind farms or small clusters of wind turbines but where the visual impact on sensitive or vulnerable landscapes, listed highly scenic routes, scenic routes, scenic viewing points and scenic routes will be the principal consideration. The Tier 2 classification will be reviewed by the Council following a determination by EirGrid of grid infrastructure for the County.

Notwithstanding, the RES states that the **Planning Authority will consider all proposed renewable energy developments submitted through the planning system and, irrespective of the wind energy classifications identified within the Strategy, each will be assessed on the principles of proper planning and sustainable development.**⁹

The RES also states that Applicants applying for planning permission for renewable energy developments are required to demonstrate that any proposed renewable energy developments comply with the requirements set out Section 6.5 of the RES along with requirements set out in the Mayo County Development Plan and any national guidelines in relation to the location of renewable energy developments. These mitigation requirements relate to *inter alia*, Biodiversity and Flora and Fauna; Population and Human Health; Soils and Geology; Water Protection; Noise; Climatic Factors; Flooding; Transport Infrastructure; Waste Management; Energy Infrastructure; Cultural Heritage; and Landscape. It is noted that an assessment of the Proposed Development against each of these factors is provided throughout the EIAR submitted with this application and which demonstrates that no significant impacts on the receiving environment are predicted.

Having regard to the above, the following section sets out a brief summary of how the Proposed Development complies with the mitigation requirements applicable to such a development, however further detailed analysis is provided in the relevant EIAR chapters:

- Wind farm developments will only be considered within 500m of sensitive receptors (e.g. residential properties) where the developer has received witnessed written consent from the owner/occupier of such properties consenting to the location of the development within 500m of their property (A significant minimum separation distance of c. 1.3km between the proposed turbines and any occupied dwelling has been achieved as part of the development design process. Refer to Section 3.5.1 of the EIAR for further details).
- Landslide susceptibility and slope stability risk assessments shall be carried out by a suitably qualified person(s) in conjunction with the Geological Society Ireland (The Geotechnical & Peat Stability Assessment Report, included as Appendix 8-1 of this EIAR concludes that the proposed Sheskin South Wind Farm site has an acceptable margin of safety in relation to peat instability and is considered to be at **low** risk of peat failure).
- The developer will be required to ensure that the Proposed Development will not have a negative impact on freshwater pearl mussel and its habitat; fish spawning grounds; fish migration routes; access to fishing grounds; and water quality during installation, operation and maintenance of any renewable energy development (The proposed drainage measures and controls for the wind farm site, refer to Sections 4.7 and 9 of the EIAR and Section

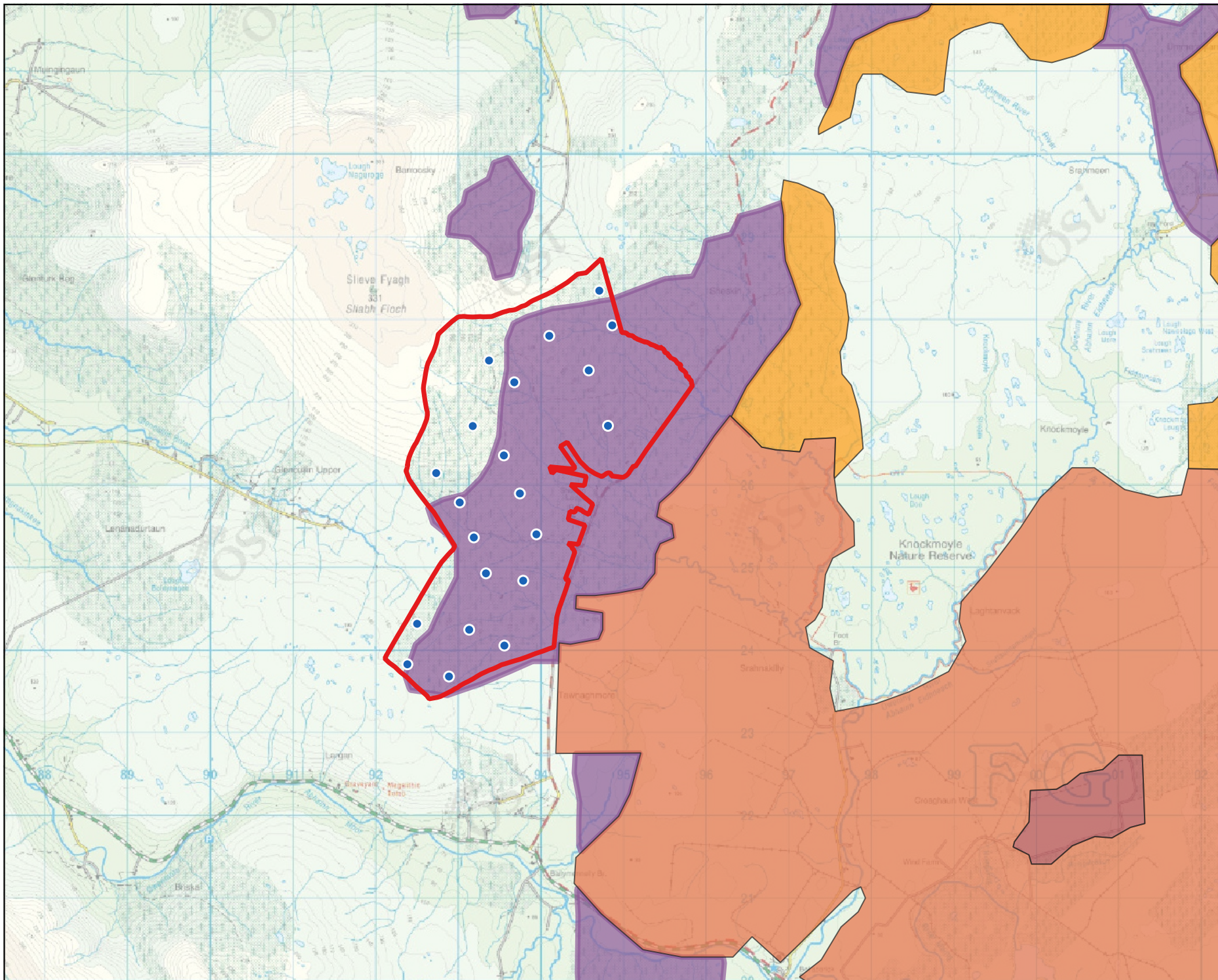
⁹ Renewable Energy Strategy for Co. Mayo 2011 – 2020, pg 52

- 3.2.10 and 5.4.1.2.3 of the NIS, will ensure that the proposed Sheskin South Wind Farm development will not have a negative impact on water quality, aquatic habitats or species.).
- Proposals for renewable energy development shall be required to demonstrate that connection to the national grid can be carried out in a sustainable manner (the proposed grid connection will be subject to a separate planning application and has been assessed as part of this EIAR as not having any cumulative significant effects with the Proposal Development); and
 - Renewable energy developments shall be sited and designed to minimise the impact to visual amenity of the surrounding area; (The Landscape and Visual Impact Assessment concludes that the sensitivity of the residential visual amenity in the surrounding area of the subject development is reduced by the lack of settlements and limited numbers of dwellings in proximity of the site. The turbines of the Proposed Development adhere to the required set-back distances from residential properties set out in the Wind Energy Development Guidelines (DoEHLG, 2006), and Draft Wind Energy Development Guidelines (DoPHLG, 2019). In fact, the turbines are located c. 1.3km from the nearest residential property, over twice the required set-back distance. Refer to Section 13.7.3.3.3. of this EIAR for further details)

The subject site comprises a mix of Tier 2 and ‘unclassified’ lands. The planning application has demonstrated that the project site can adequately accommodate the Proposed Development without significant adverse impacts to environmental amenities and sensitivities, and therefore, is fully in accordance with National, Regional and Local planning policy. The Environmental Impact Assessment Report, Natura Impact Statement and all supporting assessments provide a robust body of evidence demonstrating that the receiving environment has the capacity to support / co-exist with the proposed wind farm without significant adverse effects. This documentation is intended to provide the consenting authority with robust appropriate conclusions to facilitate a positive decision.

Justification of the Site in the context of the Mayo Renewable Energy Strategy

A portion of the Proposed Development site (i.e., 16 turbines) is located within Tier 2 lands, which have been classed as being ‘*Open for Consideration*’ for the provision of wind turbines within the Mayo Renewable Energy Strategy 2011-2020 (the RES). The areas of the proposed site that are located outside this are ‘*unclassified*’, however, share the same characteristics as the portion within the classified lands and also conform to the suitability factors listed previously above. The RES states that applications for wind turbines in the ‘*Open for Consideration*’ areas are open to development, subject to conformance with all other requirements of the County Development Plan, including objectives relating to landscape protection and the protection of residential amenity. The rationale behind this is to minimise the impacts of large-scale developments on the environment of Co. Mayo as a whole, while maximising the potential for optimal and efficient renewable energy generation.



Map Legend

- Application Site Boundary
- Proposed Turbine Locations
- Open for Consideration Tier 2
- Preferred Tier 1 Large
- Consented Wind Farms



Drawing Title Mayo Renewable Energy Strategy Classification Areas	
Project Title Sheskin South Wind Farm, Co. Mayo	
Drawn By EM	Checked By MW
Project No. 201119	Drawing No. Fig. 2-2
Scale 1:60,000	Date 17.02.2023
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As shown in Figure 2-2 above, the majority of EIAR study area is located within the area designated as being ‘open for consideration’ for wind farm development. There are also areas that lie outside this designation and in which it is proposed to place 5 no. wind turbines. While these 5 no. turbines are located outside of the Open for Consideration (OTC) Area, they are located within 400m of the OTC area, and also located within the viable area, as determined following a physical and environmental constraints study which is described in Section 3.5.1 of the EIAR. The RES outlines that the areas identified in the RES are deemed the most appropriate for renewable energy developments. However, the Local Authority will consider all proposed renewable energy developments submitted through the planning system on a case by case basis, unless located on a Natura 2000 site, as per Section 6.4 of the RES.

Detailed Constraints Analysis

Due to other constraints and the requirement for spacing between other proposed turbines, these 5 no. turbines were most appropriately sited outside the OTC area. As such a detailed environmental constraints assessment was conducted which led to the siting of these turbines outside of the OTC area.

Notwithstanding the current designations in the RES (from any site inspection and considering the strategy’s methodology) the entirety of the subject site benefits from the same characteristics, falls within the same (Policy Area 3) landscape designation, and meets the key criteria, as outlined in the RES (and above), for land suitable for wind energy development. Due to these similarities, the entirety of the subject site should be evaluated as Tier 2 lands. Refer to Chapter 13 – Landscape and Visual, of this EIAR, (and in particular Section 13.4.1.2) for further detail on Landscape Sensitivity.

The subject site, which comprises of forest and semi-natural areas (coniferous forest with smaller pockets of scrub / herbaceous vegetation) are surrounded primarily by a mixture of inland wetlands with dispersed commercial forestry, woodland and agriculture with very low densities of residential development in the vicinity of the site. This allowed the Proposed Development to achieve a significant minimum separation distance of 1.3km between the proposed turbines and any occupied dwelling as part of the development design process.

By necessity, the RES for Mayo is a strategic document and the areas designated as being appropriate for wind farm development have arisen from applying a strategic “sieve” analysis to the County. An evaluation of the landscape and its sensitivity for renewable energy developments was prepared. Planning considerations such as designated natural heritage areas, built heritage, scenic views/routes, cycle/walking route and populated areas and infrastructure constraints were identified. Environmental considerations arising from the strategic environmental assessment and Habitats Directive Assessment of the County Development Plan and the RES were also identified.

On review of the Mayo RES, it appears that that ecological designations and landscape sensitivities as well as proximity to settlements and other technical considerations all informed the identification of areas suitable for wind energy development in Mayo. As mentioned previously, while the entirety of the EIAR site boundary shares common characteristics, a portion of the subject site is situated in unclassified lands. However it is noted that the RES does not clarify the exact reasoning why the subject area being Tier 2 and unclassified.

It should be noted that pNHA sites do not have any legal designations or protections under the Wildlife Act 1976 (as amended) and therefore, the application of arbitrary setbacks and exclusion areas from these non-designated areas, is not a mandatory or legislative requirement. The requirement for and scale of setbacks should typically be established as part of project specific site constraints mapping or studies. It is acknowledged that the generic setbacks used within the RES can inform strategic decision making at a macro level, the protection of sensitive features (which is the fundamental principle driving the RES setbacks) can also be assured by site specific project design and mitigation once a greater understanding of any site, its surroundings and conditions is achieved.

This greater site-specific understanding has been facilitated in the current instance through the EIA process. The detailed and site-specific studies carried out to inform this EIAR has allowed a more detailed and finer-grain analysis of the relevant issues to be carried out and the details set out in the relevant sections of this EIAR confirm that the design of the proposed wind farm can be accommodated as proposed without adverse impact on the sensitive features identified in the RES. In relation to the SAC's and SPAs in the wider vicinity, the NIS and range of ecological studies carried out demonstrate that the Proposed Development will not give rise to adverse impacts on these Natura sites.

The findings and conclusions of the EIAR clearly point to the Proposed Development not only being suitable as proposed but also being in line with the requirements of proper planning and sustainable development in that the site can clearly accommodate a development as proposed without significant adverse impact on the environment in the vicinity.

Conflicting Provisions

It is submitted that the County Development Plan contains conflicting, or dual, provisions relating to renewable energy, which on one hand supports the provision of renewable energy and specifically recognises areas as being appropriate locations for such infrastructure, while on the other, not recognising the entirety of the subject site which has the same characteristics throughout as being within the designated area which is open for consideration to wind projects. As such, it can be argued that the Proposed Development does not contravene the development plan provisions, particularly as the sensitive features for which apparent buffers have been applied in the RES remain protected from potential significant impacts from the Proposed Development through the design process and the range of associated mitigation measures.

The identification of the western portions of the subject site as being unsuitable for wind energy would appear to be contrary to the stated underlying rationale of the RES to maximise wind energy developments in suitable areas. It is evident that there is a conflict between the overall vision of the RES (which seeks to harness the energy and economic potential of County Mayo presented by renewable technologies while protecting the environment) and the current RES designation for the subject site. However, the findings and conclusions of this EIAR clearly point to the Proposed Development not only being suitable as proposed but also being in line with the requirements of proper planning and sustainable development in that the site can clearly accommodate a development as proposed without significant adverse impact on the environment in the vicinity.

Strategic Infrastructure Development

Lastly, it must be noted that the subject development has been confirmed as a Strategic Infrastructure Development (SID) by An Bord Pleanála (ABP), thereby requiring an application directly to ABP under the provisions of Section 37E of the Act. Section 37G of the Act states that;

“(1) When making a decision in respect of a Proposed Development for which an application is made under section 37E, the Board may consider any relevant information before it or any other matter to which, by virtue of this Act, it can have regard.”

Section 37G Subsection (2)(c) states that *“Without prejudice to the generality of subsection (1), the Board shall consider the provisions of the development plan or plans for the area”* however subsection 6, notes that the Board may;

“decide to grant a permission for development, or any part of a development, under this section even if the proposed development, or part thereof, contravenes materially the development plan relating to any area in which it is proposed to situate the development.”

Accordingly, An Bord Pleanála are not bound by the provisions of the Development Plan in determining SID applications and can grant permission for the development of wind turbines outside of the area deemed appropriate for wind farm developments in the Development Plan. However, having regard to the dual provisions of the County Development Plan, which on the one hand supports the provision of

renewable energy in suitable locations, while on the other the entirety of the proposed site is not within the wind designated area within the RES, it can be argued that the Proposed Development does not contravene the development plan provisions, particularly as the sensitive features that have been applied in the RES remain protected from potential impacts from the Proposed Development through the design process and the range of mitigation measures associated. Furthermore, as set out in the RES, the Planning Authority will consider all proposed renewable energy developments submitted through the planning system and, irrespective of the wind energy classifications identified within the Strategy, each will be assessed on the principles of proper planning and sustainable development.

2.4.4 Other Relevant Material Considerations

2.4.4.1 DoEHLG Wind Energy Guidelines 2006

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

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

2.4.4.2 Department Circular PL5/2017

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

The Department circular also sets out the four key aspects of the *preferred draft approach* being developed to address the key aspects of the review of the 2006 Wind Energy guidelines as follows:

- The application of a more stringent noise limit, consistent with World Health Organisation noise standards, in tandem with a new robust noise monitoring regime, to ensure compliance with noise standards;
- A visual amenity setback of 4 times the turbine height between a wind turbine and the nearest residential property, subject to a mandatory minimum distance of 500 metres between a wind turbine and the nearest residential property;
- The elimination of shadow flicker; and

- The introduction of new obligations in relation to engagement with local communities by wind farm developers along with the provision of community benefit measures.

2.4.4.3 IWEA Best Practice Guidelines for the Irish Wind Energy Industry 2012

The Irish Wind Energy Association (IWEA) (now Wind Energy Ireland) published updated Wind Energy Best Practice Guidelines for the Irish Wind Industry in 2012. The guidelines aim to encourage and define best practice development in the wind energy industry, acting as a reference document and guide to the main issues relating to wind energy developments. The purpose of the guidelines is to encourage responsible and sensitive wind energy development, which takes into consideration the concerns of local communities, planners, and other interested groups. The guidelines outline the main aspects of wind energy development with emphasis on responsible and sustainable design and environmental practices, on aspects of development which affect external stakeholders, and on good community engagement practices. In approaching the development of IWEA's guidelines the aim was to be complementary to the Department of the Environment Heritage and Local Government's 'Wind Energy Development Guidelines' (2006).

2.4.4.4 IWEA Best Practice Principles in Community Engagement and Community Commitment 2013

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

The applicant has engaged in consultations with the population in the direct vicinity of the Proposed Development through letter drops to the local community. A dedicated community liaison officer has also been appointed to the project with the general public being provided with various contact details (including email address and phone number) to facilitate any queries which may arise. In the light of the various Covid-19 restrictions which have been implemented by the government of Ireland over 2020 and 2021 the applicants have been unable to facilitate door to door call outs and public events as initially planned for, however, the applicants have made an effort to provide meaningful engagement as outlined.

Further details on the community engagement that has been undertaken as part of the Proposed Development are presented in Section 2.5 below.

In December 2016, the (then) Department of Communications, Climate Action and Environment (DCCAE) issued a Code of Practice for wind energy development in relation to community engagement. The Code of Good Practice is intended to ensure that wind energy development in Ireland is undertaken in adherence with the best industry practices, and with the full engagement of local communities. Community engagement is required through the different stages of a project, from the initial scoping, feasibility and concept stages, right through construction to the operational phase. The methods of engagement should reflect the nature of the project and the potential level of impact that it could have on a community. The guidelines advise that ignoring or poorly managing community concerns can have long-term negative impacts on a community's economic, environmental or social situation. Not involving communities in the project development process has the potential to impose costly time and financial delays for projects or prevent the realisation of projects in their entirety. Community engagement in relation to the Proposed Development is discussed in full in Section 2.5 below.

2.4.4.5 Commission for Regulation of Utilities: Grid Connection Policy

The Commission for Regulation of Utilities (CRU) (previously the Commission for Energy Regulation (CER)) launched a new grid connection policy in March 2018 for renewable and other generators, known as ECP-1, which seeks to allow “shovel ready” projects that already have a valid planning permission, connect to the electricity networks. The principal objective which guides this decision is to allow those projects to have an opportunity to connect to the network, along with laying the foundations for future, more regular batches for connection. August 2018 saw the applicants for new connection capacity under ECP-1 published. ECP-2 was launched in June of 2020, with ECP-2.1 applications submitted in September 2020. ECP-2.2 applications were due in September 2021 and ECP-2.3 applications are scheduled for September 2022.

The enduring connection policy regime replaces the previous ‘Gate’ system of grid connection applications. The grid connection application window under ECP-1 was the first time since 2007 that certain renewable energy projects including wind farms had an opportunity to secure a new grid connection offer.

With the ECP2 ruleset now published and with a timeline set for the next rounds of applications there is a clear pathway for the Project to secure a grid connection in a timely manner, subject to receipt of planning permission.

2.4.4.6 Renewable Energy Support Scheme (RESS)

The Climate Action Plan 2021, is the Government’s plan to give Irish people a cleaner, safer and more sustainable future to halve emissions by 2030 and reach net zero no later than 2050. The Plan sets out actions across every sector which will ensure we meet our future climate commitments. A key part of the Plan is to achieve at least 70% of electricity demand from renewable sources and to increase the share of electricity demand generated from renewable sources to up to 80% by 2030. These measures will be driven by introduction of the Renewable Electricity Support Scheme (‘RESS’) which aims to promote the generation of electricity from renewable sources.

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

The Auction Scheme and the ECP framework has now been established and is operational and will facilitate and provide a pathway to realise Ireland’s ambition of up to 80% renewable electricity by 2030, and an EU-wide renewable energy target of 32% by that date also.

2.4.4.7 Draft Guidelines

DoEHLG Wind Energy Guidelines 2006 (Revisions)

Further to information set out in Section 2.2.4.1 in relation to the 2006 Wind Energy Guidelines it should be acknowledged that the (then) Department of the Environment, Community and Local Government published proposed revisions to the guidelines in December 2013 as part of a targeted review relating to Noise, Proximity and Shadow Flicker for discussion. Revisions to the Wind Energy Guidelines continue to be considered and draft revisions were published in December 2019, these are further discussed below.

Draft Revised Wind Energy Development Guidelines, December 2019

The (then) Department of Housing, Planning and Local Government published the *Draft Wind Energy Guidelines* (referred to as the Draft Revised Guidelines) in December 2019 and these Draft Guidelines were under public consultation until 19th February 2020. Following the previous 2013 consultation and subsequent detailed engagement between the relevant Government Departments, a “preferred draft

approach” to inform and advance the conclusion of the review of the 2006 guidelines was announced in June 2017.

In line with the previously stated “*preferred draft approach*”, the 2019 Draft Guidelines primarily focus on addressing a number of key aspects including, but not limited to:

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

The design of the proposed development has taken account of the “preferred draft approach” as articulated by the Department in June 2017, and accordingly, has been developed with the provisions of the current Draft guidelines in mind.

Similar to the 2006 Guidelines, the Draft Revised Guidelines also state that underground grid connections for wind energy projects are considered the most appropriate environmental and/or engineering solution (e.g. default approach), particularly in sensitive landscapes. The EIAR is cognisant of the Draft Revised Wind Energy Development Guidelines and will address each key matter (e.g. noise and shadow flicker standards) in turn within the relevant sections of this EIAR. As demonstrated in the subsequent chapters, the Proposed Development will not result in any likely significant effects on the receiving environment. In relation to the Shadow Flicker, the Proposed Development can satisfy the draft guidelines requirement as this is an operational matter that can be controlled by the SCADA system if necessary. In relation to the noise elements of the Draft Guidelines, it is this section that has given rise to the most scrutiny from industry experts who have sought significant amendments and clarifications. While the outcome of the public engagement process on the Draft Revised Guidelines is not yet known, the operational noise parameters can be controlled using the SCADA system, and therefore, the Sheskin renewable energy development will ultimately comply with future guidelines should they be adopted/finalised during the consideration period of the current application. According to the Climate Action Plan 2021, the Revised Guidelines are expected in Q2 2023.

2.5 Planning History

This Section of the EIAR sets out the relevant planning history of the Proposed Development site, planning applications in the vicinity of the site and other wind energy applications within the wider area. The period adopted for the purposes of this search is from 2017 – 2023, adopting the approach that any development permitted prior to that period has either expired or has been constructed and forms part of the baseline. For the purposes of reviewing and stating the relevant planning history for this project the following criteria have been adopted in relation to the various elements of the Proposed Development:

1. All planning applications which overlap or are within the red line planning application boundary of the current Proposed Development have been identified.
2. A buffer zone of c. 20 kilometres was established from the redline application boundary of the Proposed Development in order to identify other wind farm sites in the wider area. For the purposes of this EIAR the planning history was extended to this wide range for wind farm developments due to the nature of the projects, potential for visual and cumulative affects to arise with the Proposed Development as identified in Chapter 12: Landscape and Visual Assessment.
3. Non-wind energy related planning applications within c. 2km of the proposed project site boundary were investigated. The c.2 km distance was considered reasonable based on the nature and scale of the project. This planning history search generally covers the period from 2017-2023, based on the assumption that any permitted development prior to that date has either expired or has been

constructed and therefore forms part of the baseline. Large scale developments that would potentially have 10-year permissions were also considered.

4. Finally, planning applications within a 200m distance of the proposed grid connection route were searched for. As the underground electrical cabling of the Proposed Development has limited scope for cumulative impacts to arise given its localised nature. For the cable route localised impacts arise from construction period only as all other activities continue once it is in place.

2.5.1 Applications Within the Proposed Development Site

A desk-based planning search was undertaken for the study area using multiple sources, including the Mayo County Council and An Bord Pleanála online planning portals and the EIA portal. There have been no planning applications lodged to Mayo County Council for development on land located within the EIAR study area post 2017. Airtricity’s Sheskin Wind Farm was lodged within the Proposed Development site in 2003 and is therefore included in this study for completeness.

Mayo County Council – proposed Airtricity Sheskin Wind Farm (Planning Reference 03/1298 – ABP PL16.206378)

Airtricity lodged a planning application for wind energy infrastructure in the general vicinity of the Sheskin Wind Farm project site to the Planning Authority on the 29th May 2003. The Proposed Development comprised 31 no. wind turbines (60m hub height and 80m blade diameter with total height not exceeding 100m), a 110 kV substation and all other associated services and site development works at Barroosky, Glenamoy and Sheskin townlands, Co Mayo. The proposal was refused in February 2004 by the Planning Authority due in part to,

“The height, scale and location of the proposed turbines which is considered to be of high visual amenity and remote in character and having regard to national policy it is considered that the Proposed Development would be visually obtrusive and interfere with the character of the landscape and with a view of special amenity value which it is necessary to preserve. The Proposed Development therefore would be contrary to the proper planning and development of the area.”

The refusal also cited an inadequate EIS and the premature nature of the proposal in the absence of a comprehensive wind energy strategy for the county.

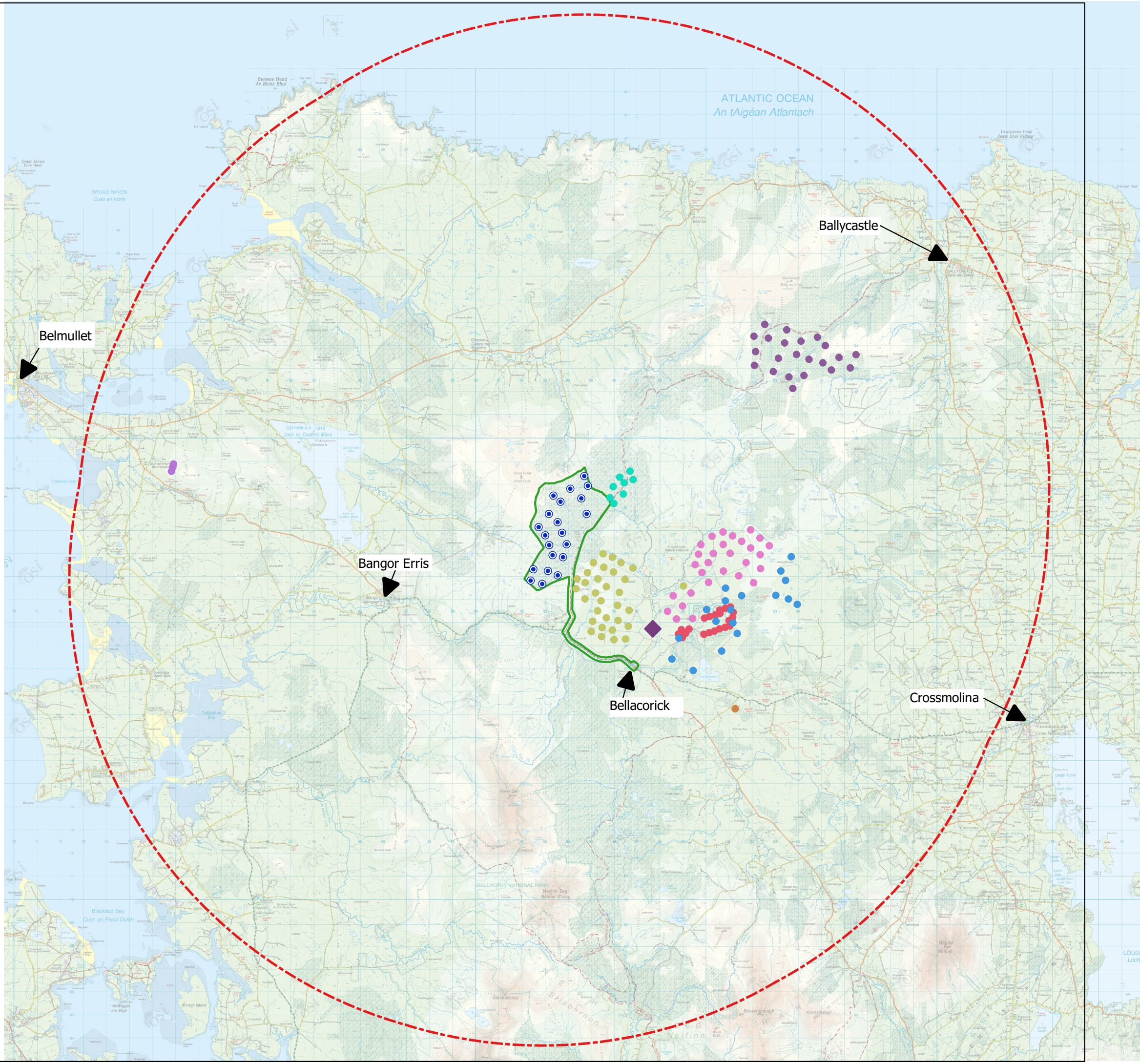
The Planning Authority’s decision was subject to a 1st Party appeal to the Board (ABP PL16.206378).

In refusing permission for the development in September 2004, the Board set out two grounds for refusal concerning its prematurity in light of the pending wind energy strategy in accordance with the Mayo 2003-2009 CDP Objectives and lacunae in the assessments on slope failure prevention.

In light of the above reasons for refusal it is worth noting that a Renewable Energy Strategy for County Mayo was adopted by Mayo County Council in 2011 and a comprehensive EIAR is submitted with this application. As such, these refusal reasons are not relevant to the proposed development. The planning policy has also significantly changed since 2003 in favour of renewable energy developments, which is further highlighted by the introduction of Renewable Energy Strategies.

2.5.2 Wind Energy Applications Within 20km of the Application Boundary

Relevant planning history of other wind energy projects with the potential for cumulative impacts are considered to be those within c. 20km of the Proposed Development. These are set out in Table 2-2 below. Other wind energy development applications not listed below have either expired, or were



Map Legend

- EIA Site Boundary
- Proposed Sheskin South Turbine Locations
- 20km Sheskin South WF Turbine Buffer

Other Developments within 20km of Sheskin South Wind Farm

- ABO Sheskin Wind Farm - Permitted
- Bellacorick - Existing
- Bunnahowen - Existing
- Dooleeg More Single Turbine - Permitted
- Oweninny Phase 1 - Existing
- Oweninny Phase 2 - Permitted (Under Construction)
- Oweninny Phase 3 - Proposed
- Glenora Wind Farm - Proposed
- ◆ Proposed Hydrogen Plant - Mayo County Council
Planning reference: 22502



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Drawing Title
Other Developments within 20km of Sheskin South Wind Farm

Project Title
201119 - South Sheskin Wind Farm

Drawn By ER	Checked By EM
Project No. 201119	Drawing No. Fig 2-3
Scale 1:160,000	Date 2023-01-12

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constructed and form part of the baseline. The locations of other existing, permitted and proposed wind energy developments within 20km of the Proposed Development are shown in Figure 2-3.

Table 2-3 Wind Energy Applications Within 20km of Application Boundary

Pl. Ref	Description	Decision
Sheskin Wind Farm (ABO Wind Ireland Ltd.)		
15825	8 Wind turbines with associated hardstanding, construction of new internal access tracks, upgrading existing access tracks, underground cabling, permanent meteorological mast and associated hardstanding, electrical substation, recreational walking trail, site compound and associated works, each wind turbine will have an overall max height of 150 metres, comprising a tower 95-105m high, to which three blades of 45-55 m length will be attached	10 year permission Granted by MCC 07/12/2016 subject to 46 conditions
19457	Amendments to existing planning permission p15/825 for 8 turbines with an overall max height of 150m, amendments to include - an increase in the overall maximum height of the turbines from 150m to 176m (turbines 1-3) and from 150m to 165m (turbines 4-8) comprising a tower 95-120m high to which three blades of 55-70m length will be attached. an increase in the maximum height of the permanent met mast from 100m to 120m. an increase in the diameter of the foundation base from 22m to 26m. an amendment to condition no 46 to revise the community benefit payment to 2 euro/mwh to be consistent with government guidance set out under the renewable electricity support scheme. the red line boundary and all other aspects of the permitted development will remain unchanged	Granted by MCC 06/11/2019 subject to 52 conditions
Sheskin Wind Farm Grid Connection		
20834 (ABP 311157)	10-year permission to develop an electricity service, entailing the laying of approximately 10.4 kilometres of 38kv underground cable from the granted Sheskin wind farm to connect the wind farm to the national grid at the existing Bellacorick 110kv ESB station. the proposed grid connection will be installed along existing private tracks, the public roadway and a short section of private agricultural land	Refused by MCC on 19/07/2021 Granted by ABP 31/08/2022

Pl. Ref	Description	Decision
Oweninny Wind Farm		
ABP: PA0029	Proposed Oweninny Wind Farm and associated works, Bellacorick,	Granted by ABP 02/06/2016 subject to 20 conditions
ABP: 307261	Section 146B Planning application for amendments to ABP case reference PA0029 for Oweninny Wind Farm	Alter decision - Not a material Alteration (No EIS) (27/07/2020)
ABP: 309375	Pre-App Consultation - Oweninny Wind Farm Phase 3. Between 10 and 20 wind turbines (including tower sections, nacelle, hub, rotor blades) with an approximate capacity of 90 MW and a maximum blade tip height of 200 metres.	Determined it is an SID – 04/04/2022
Dooleg More Single Turbine		
20467	Single wind turbine generator and 20kV grid connection to Bellacorick 110kV substation	Granted by MCC 25/03/2021 subject to 15 conditions
Bunnahowen Wind Farm		
18873	Permission to modify the existing permission, p08/1997, to erect three (3) 1mw turbines, control house and ancillary associated works	Granted by MCC 10/03/2019 subject to 6 conditions
Kilsallagh Wind Farm		
ABP: 312282	Proposed Kilsallagh Wind Farm consisting of 13 wind turbines and ancillary equipment including 110kV substation infrastructure.	Pre-App consultation request lodged 21/12/2021
Corvoderry Wind Farm		
11838	Erect an electricity generating wind farm consisting of 10 wind turbines each with an overall height of up to 100 metres, hardstandings, an electrical compound and substation building, 4 car park spaces, associated site roads, drainage and site works	Granted by MCC 10/09/2012 subject to 42 conditions. The permission expired on 14/10/2022
Bellacorick Wind Farm		
ABP: 311157	10 Year permission to develop an electricity service, entailing the laying of	Granted by ABP 31/08/2022 subject to 7 conditions.

Pl. Ref	Description	Decision
	approximately 10.4km of 38KV underground cable from the granted Sheskin Wind Farm to connect the wind farm to the national grid at the existing Bellacorick 110KV ESB Station. A Natura Impact Statement was lodged with the planning application.	
Glenora Wind Farm		
ABP: 310528	Wind energy development and associated works and services.	Pre-Application Consultation has yet to be concluded

2.5.2.1 Adjacent Projects

Consented ABO Sheskin Wind Farm

The Sheskin South Wind Farm project site is located immediately adjacent to the southern boundary of the permitted ABO Sheskin Wind Farm. ABO Wind Ireland Ltd. lodged a planning application under Pl Ref. 15/825 to the Planning Authority on the 21st December 2015 for 8 no. wind turbines with an overall blade tip height of up to 150m and ancillary site development works. Within the lodged application documentation, ABO emphasised the development’s proximity to the larger Oweninny Wind Farm and the site’s predominantly Tier 1 designation in arguing that ABO Sheskin Wind Farm should be read in conjunction with Oweninny rather than as a separate visually obstructive development. The applicant also emphasised the use of varying turbine heights between the two wind farm in order to compliment the surrounding topography.

The Planning Authority (MCC) did not raise any concerns with regard to potentially significant effects on landscape and visual amenity arising from the ABO Sheskin Wind Farm nor did they issue any further queries on these matters within the Request for Further Information (RFI) on the project. The RFI (dated 22nd February 2016) comprised 16 no. queries predominantly relating to lodged Natura Impact Statement and its assessment methodology. These issues were responded to by ABO within their RFI response, which included an amended NIS, and have been reviewed by the EIA Project Team in order to identify any items of relevance in the context of the Sheskin South Wind Farm project. The Planning Authority ultimately granted permission for the ABO Sheskin Wind Farm on the 7th December 2016 without appeal proceedings.

ABO lodged a second application on ABO Sheskin Wind Farm (Pl Ref. 19/457) to the Planning Authority on the 12th June 2019 for amendments to the extant permission (Pl Ref. 5/825), including an increase in the overall maximum height of the turbines from 150m to 176m (turbines 1-3) and from 150m to 165m (turbines 4-8) and increases in height of the permanent met mast from 100m to 120m. Within their assessment of the proposal, the Authority highlights that, while it is reasonable to optimise wind energy infrastructure in Tier 1 and Tier 2 areas, this development should not be detrimental to the visual amenity of the wider area. In this context, the Authority concluded,

“The increased visual impact arising from the increases in turbine heights at 165m and 176m is considered to be relatively indiscernible, and as such, there are no concerns in relation to landscape protection particularly in light of the permitted development on site.”

The Planning Authority granted permission for the development on the 28th of January 2020, which was not subject to any subsequent appeal proceedings.

ABO most recently lodged an application to Mayo County Council under PL Ref. 20/834 on the 10th of November 2020 in relation to the ABO Sheskin Wind Farm’s proposed national grid connection comprising c. 10.4km of 38 kV underground cable from the consented wind farm to the 110 kV Bellacorick substation. The underground cable route corridor encompasses private track, the public roadway (L52926 and N59) and a short section of private agricultural land. The application was refused permission by Mayo County Council 19/07/2021 and subsequently granted permission by ABP on 31/08/2022 (ABP: Ref. 311157).

Glenora Wind Farm (ABP Ref. 310528)

Glenora Wind Farm DAC lodged a pre-application consultation request for the proposed Glenora Wind Farm on 16th June 2021 with consultations yet to be concluded. The proposed wind farm is in close proximity to the subject proposed Sheskin Wind Farm and therefore will be considered as part of the cumulative assessment. This project is in the final design phase and an application is expected to be submitted in the first half of 2023.

2.5.2.1.1 **SID Wind Energy Infrastructure**

Oweninny Wind Farm (ABP Ref. PA0029)

There have been several applications lodged for wind energy infrastructure within 20km of the Sheskin South Wind Farm project site. Oweninny Wind Farm, which was directly applied for to the Board (PA0029) under the SID consent process, comprises 61 no. wind turbines with a turbine envelope of a maximum overall blade tip height of 176m (hub height of up to 120m and rotor diameter up to 120m). In assessing the application, the Board’s Inspector observed that the site is characterised by open and unimpeded panoramic views across a smooth and uniform landscape which results in ‘*openness, emptiness, remoteness and isolation*’. While acknowledging that there will be cumulative landscape and visual effects with other wind farms, the Inspector noted that the majority of available views of the wind farms will not be distinguishable from one another, and furthermore, majority of recreation and tourism routes are located outside the primary principal visual zone. The Inspector, in recommending a grant of permission, concludes the following on potential effects on landscape and visual amenity,

“Considering the large scale of the surrounding, generally homogeneous, landscape, the introduction of the wind farm will not be perceived as being out of context with the overall underlying landscape character. The Proposed Development will result in a sustained presence of vertical man-made elements, which will form a new landmark over time.”

Following an Oral Hearing processes conducted in April 2014, the Board adopted the Inspector’s recommendation and decided to grant permission for the proposal in 2016. Within the immediate vicinity of Oweninny Wind Farm, there is the Bellacorick Wind Farm (Pl Ref. 00/2822), comprising 21 no. turbines, and Corvoderry Wind Farm (Pl Ref. 11/838), which consists of 10 no. turbines with an overall blade tip heights of 100m.

2.5.3 **Applications in the Vicinity of the Turbine Infrastructure**

Following a desktop review of the Mayo County Council online planning portal there have been no new residential development applications within c. 2km of the proposed turbine infrastructure lodged in the last 5 years. The approach taken considers any permitted development identified prior to 2017 to be either expired or constructed (and therefore forms part of the baseline).

The study area is located in a rural setting with low density residential development in the surrounding area. Previous planning applications are generally confined to lands to the north (clustered around the

Glenamoy settlement – c. 2.25km) and to the southwest towards Bangor and its Environs (c. 7.2km). The most recent granted applications for residential development have been listed below:

PI Ref. 15/592: Construct extension to dwelling house, connect to all services and carry out all ancillary works on site (Conditional Grant - 07/04/2016)

PI Ref. 17/376: New extension, renovations and alterations to the existing dwelling house and all associated site works (Conditional Grant - 06/11/2017).

PI Ref. 19/712: Retain existing extension to east elevation of dwelling house (Conditional Grant - 19/06/2020)

As indicated above, there have not been any new dwellings permitted within the general vicinity of the study in the last 5 years, with only minor amendments/extensions/alterations permitted. Currently, there are 22 no. dwellings within 2km of a proposed turbine, with the closest occupied residential dwelling to the nearest proposed turbine located c.1.3km southwest.

2.5.4 Applications in the Vicinity of the Grid Connection Route

A desk-based planning search was undertaken to identify permitted developments in the 200m vicinity of the proposed Grid Connection Route using the Mayo County Council planning portal in January 2023. It should be noted that although the proposed Grid Connection will be subject to a separate planning application, it is assessed throughout the EIAR as it forms part of the overall project. There has been one planning application lodged to Mayo County Council for development on land located within the vicinity of the proposed Grid Connection post 2017, and this is summarised below.

Table 2-4 Applications in the vicinity of the Grid Connection Route

Pl. Ref	Description	Decision
22/502	Proposed Hydrogen Plant – Constant Energy Single storey process building of 13.3m height; 16 no. Fin fan coolers of 6.9m height; hydrogen storage area with area of 4650m ² ; gas injection compound with area of 1000m ² ; 2 no. Gas agi buildings, each of 3m height; electrical substation with area of 2407.6m ² ; 2 no substation buildings, each of 4m height; raw water and fire water storage tank with volume of 879.6m ³ ; pump house of 5m height; water abstraction chamber with volume of 2.9m ³ ; resurfacing, repair and improvement of existing site entrance; replacement bridge; internal access roads and associated grid connection works within the 152925 public roadway. The development will include the provision of 12 no. Parking spaces, footpaths, landscaping, fencing and all other associated site development plant and equipment and other works including surface water and foul wastewater drainage infrastructure within a total overall application boundary of 6.51ha	Application lodged 30/06/2022. Further Information requested 17/08/2022

A planning application was submitted by Constant Energy on the 30th of June 2022 for a proposed hydrogen production facility and associated works on lands to the northeast of Bellacorrick substation (Mayo Co Co Planning ref. 22/502). It is stated in the application documents that the grid connection route for the proposed hydrogen plant will be subject to a separate planning application.

The proposed hydrogen production facility is located c. 4 km from the boundary of the turbine infrastructure of the proposed Sheskin South Wind Farm, and c. 1.5km north of the Bellacorrick Substation. The application documents state that the proposed hydrogen plant will connect into the existing Bellacorrick substation, which the proposed Sheskin South Wind Farm also intends to connect

into. Although the grid connection element of the proposed hydrogen plant will be subject to a further separate application.

The indicated location of the grid route of the proposed hydrogen facility is within c. 200m of the grid route of the proposed Sheskin South Wind Farm, and as such, has been considered as part of the cumulative assessment. A Further Information Request was issued by Mayo County Council on 17th August 2022.

The location of the proposed hydrogen plant is shown in Figure 2-3.

2.6 Scoping and Consultations

2.6.1 Scoping

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

2.6.1.1 Scoping Responses

Table 2-5 lists the responses received from the bodies to the scoping document circulated in March 2021. Copies of all scoping responses are included in Appendix 2-1 of this EIAR. The recommendation of the consultees have informed the project design and scope of assessments undertaken and the contents of the EIAR.

Table 2-5 Scoping List and Responses

No.	Consultee	Summary Response
1.	2rn (RTE Transmission Network Ltd.)	No response received to date
2.	Airspeed Telecom	No response received to date
3.	An Taisce	No response received to date
4.	ATC- Shannon	No response received to date
5.	Ballina Airfield	No response received to date
6.	Ballyvarry Airstrip	No response received to date
7.	Bat Conservation Ireland	Response received 29 th March 2021
8.	Bellmullet Aerodrome	No response received to date
9.	BirdWatch Ireland	No response received to date
10.	Broadcasting Authority of Ireland (BAI)	No response received to date

No.	Consultee	Summary Response
11.	BT Communications Ireland	No response received to date
12.	Bunnconnellan Airstrip	No response received to date
13.	Butterfly Conservation Ireland	No response received to date
14.	Ceide Fields Visitor Centre	No response received to date
15.	Commission for Communications Regulation	No response received to date
16.	Commission for Regulation of Utilities Water and Energy	Response received 17 th December 2021
17.	Crosmolina Airstrip	No response received to date
18.	Department of Agriculture, Food and the Marine	Response received 8 th April
19.	Department of Communications, Climate Action & Environment	No response received to date
20.	Department of Culture, Heritage and the Gaeltacht	Response received 13 th July 2021
21.	Department of Defence- Aviation	Response received 7 th April 2021
22.	Department of Defence- Telecoms	No response received to date
23.	Department of Transport, Tourism and Sport	Response received 2 nd June 2021
24.	Eastern and Midland Regional Assembly	No response received to date
25.	Eir	No response received to date
26.	Eirgrid	No response received to date
27.	EMR Integrated Solutions	No response received to date
28.	ENET	No response received to date
29.	Environmental Protection Agency	No response received to date
30.	ESB Telecoms	No response received to date
31.	Fáilte Ireland	Response received 29 th March 2021
32.	Forest Service	No response received to date
33.	Gas Networks Ireland	Response received 18 th May 2021
34.	Geological Survey of Ireland	Response received 5 th May 2021

No.	Consultee	Summary Response
35.	Health Service Executive	Response received 22 nd April 2021
36.	Imagine Communications Group	No response received to date
37.	Inland Fisheries Ireland	Response received 23 rd April 2021
38.	Ireland West Knock Airport	No response received to date
39.	Irish Aviation Authority	Response received 14 th April 2021
40.	Irish Peatland Conservation Council	Response received 24 th May 2021
41.	Irish Rail	No response received to date
42.	Irish Raptor Study Group	No response received to date
43.	Irish Red Grouse Association	No response received to date
44.	Irish Sports Council	No response received to date
45.	Irish Water	No response received to date
46.	Irish Wildlife Trust	Response received 26 th May 2021
47.	Lough Conn Airstrip	No response received to date
48.	Mayo County Council- Environment Department	No response received to date
49.	Mayo County Council Heritage Officer	No response received to date
50.	Mayo County Council- Planning Department	Response received 16 th June 2021
51.	Mayo County Council Roads Department	No response received to date
52.	Met Éireann	No response received to date
53.	Netshare Ireland	No response received to date
54.	Northwestern Regional Assembly	No response received to date
55.	Office of Public Works	No response received to date
56.	Openeir	No response received to date
57.	Ripple Communications	No response received to date
58.	Sligo Airport	Response received 24 th May 2021
59.	South East River Basin District	No response received to date
60.	Sustainable Energy Authority of Ireland	No response received to date

No.	Consultee	Summary Response
61.	TETRA Ireland Communications Ltd.	No response received to date
62.	TG4	No response received to date
63.	The Arts Council	No response received to date
64.	The Heritage Council	Response received 24 th May 2021
65.	Three Ireland	No response received to date
66.	Towercom Ltd.	No response received to date
67.	Transport Infrastructure Ireland	Response received 30 th March 2021
68.	Údarás na Gaeltachta	Response received 24 th May 2021
69.	Viatel Ireland Ltd	No response received to date
70.	Virgin Media Ltd	No response received to date
71.	Vodafone Ireland Ltd.	No response received to date
72.	Waterways Ireland	Response received 25 th March 2021
73.	Western River Basin District	No response received to date

2.7 Other Consultations

2.7.1 Pre-Planning Meetings

2.7.1.1 Mayo County Council

The prospective applicant and members of the design team met on two occasions with the County Council in relation to the Proposed Development prior to the submission of this planning application.

The meeting took place on 9th September 2021 via MS Teams and included representatives from Mayo County council, MKO, SSE and Coillte. The team gave a PowerPoint presentation as an introduction to the site and development proposals, including a summary of the Strategic Infrastructure Development (SID) thresholds and criteria noting the application would be made to ABP as an SID application.

Matters discussed included:

- Site selection and location
- Policy context
- Public consultation – overview of consultations to date and potential to the area
- Landscape appraisal – designations, views and vulnerable areas
- Stakeholder engagement – scoping process and purpose
- Wind Farm design process, grid and TDR

2.7.1.2 An Bord Pleanála

A first pre-application meeting with ABP was held via MS Teams on 22nd September 2021 and included representatives from SSE, MKO and ABP. ABP invited the prospective applicant to outline the nature of the proposed developments and to highlight any matter that it wished to receive advice from the ABP.

Matters discussed included:

- Site selection and location
- Policy context
- Planning history and previously refused applications
- Landscape appraisal – site constraints, geotechnical site investigations, hydrological and hydrogeological surveys, ecological surveys and archaeological site walk over.
- Public consultation – overview of consultations to date and potential to the area
- Stakeholder engagement – scoping process and purpose

A second meeting with ABP was held on 3rd February 2022 via a MS Teams call with representatives from MKO, SSE and ABP.

The meeting commenced with updates from MKO on the project since the last meeting held on 9th September 2021, explaining that turbine locations have remained consistent since last meeting and that the project exceeds SID threshold, however highlighting that is for the discretion of the ABP.

Matters discussed included:

- Design updates
- Planning and environmental considerations – possibility of material contravention and need to highlight the material contravention in application accompanied by a strong justification, cumulative impacts,
- Public Consultation and stakeholder engagement – updates and dates
- Biodiversity - aquatic surveys, birds, drainage, habitat enhancement measures,

The meeting closed with no anticipated requirement for further meetings. The Board issued a notice under Section 37B(4)(a) on the 9th August 2022, outlining that is of the opinion that the Proposed Development falls within the scope of paragraphs 37A(2)(a) and (b) of the Act and the Proposed Development would be strategic infrastructure within the meaning of section 37A of the Planning and Development Act 2000, amended. The SID Determination notice is included as Appendix 2-2 of this EIAR.

2.7.2 National Parks & Wildlife Service

The first meeting with NPWS was held on 24th September 2022 via a MS Teams call with representatives from MKO, SSE and NPWS to introduce the project.

Matters discussed included:

- Site Location and habitat maps
- Surveys – flora and fauna observations on site, habitats, surveys undertaken, surveys ongoing and surveys upcoming
- Main ecological considerations
- Scoping
- Construction Environmental Management Plan (CEMP)

A second meeting was held on 26th January 2022 via a MS Teams call with representatives from MKO, SSE, MWP and NPWS. The meeting commenced with a run-through of the previous meetings by MKO which was held on 24th September 2021 and the follow up items which were issued to NPWS post meeting.

Matters discussed included:

- Bio enhancement plans including bog rehabilitation and species mortality
- Ornithological matters
- The proposed grid connection and the consideration for loss of habitat due to clearfelling

2.7.3 Other Public Consultation – Community Engagement

SSE Renewables and FuturEnergy Ireland have carried out an active engagement, consultation and dialogue with the local community from an early stage in the development (commencing September 2020), and preapplication stage of the Sheskin South Wind Farm Project and is currently ongoing. As set out in the Sheskin South Wind Farm Community Report (attached as Appendix 2-3) the process enhanced the Applicant's understanding of the key issues and concerns of the local community, relating to wind farm development, as well as other wider issues impacting the communities and allowed the Applicant to establish a network of contacts in the area. This network will be of critical importance, to allow for a partnership approach to develop, if the project is to progress to construction. Please refer to Appendix 2-3 for further details.

2.8 Cumulative Impact Assessment

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

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

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

2.8.1 Methodology for the Cumulative Assessment of Projects

To gather a comprehensive view of cumulative impacts on these above environmental considerations and to inform the EIA process being undertaken by the consenting authority, each relevant chapter within the EIAR addresses the potential for cumulative effects where appropriate.

The potential cumulative impact of the Proposed Development and other relevant developments has been carried out with the purpose of identifying what influence the Proposed Development will have on the surrounding environment when considered cumulatively and in combination with relevant approved, existing and planned projects in the vicinity of the proposed site.

The cumulative impact assessment of projects has three principle aims:

- To establish the range and nature of existing and/or approved projects within the cumulative impact study area of the Proposed Development.
- To summarise the relevant projects which have a potential to create cumulative impacts.
- To identify the projects that hold the potential for cumulative interaction within the context of the Proposed Development, and discard projects that will neither directly or indirectly contribute to cumulative impacts.

Assessment material for the cumulative impact assessments carried out within this EIAR was compiled in relation to the relevant developments within the various zones of sensitivity of and to the Proposed Development from which there may be potential for cumulative impacts to arise. The material was gathered through a search of relevant online planning registers, reviews of relevant EIS/EIAR documents, planning application details and planning drawings, and served to identify past and future projects, their activities and their environmental impacts.

2.8.2 Projects Considered in Cumulative Assessment

The projects considered in relation to the potential for cumulative impacts and for which all relevant data was reviewed (e.g. individual EIS/EIAR's, layouts, drawings etc) including those listed previously above in this EIAR and all relevant associated works. Each individual chapter will assess the Proposed Development in combination with these other projects which have been further detailed below.

2.8.2.1 Other Wind Farms

There are 9 no. wind farm developments operational, consented or proposed, that have been identified due to either an application or a request for pre-application consultation having been lodged or permitted in proximity to the proposed wind farm:

- Sheskin Wind Farm (Consented – PI Ref. 19/457)
- Bellacorick (Operational - PI Ref. 20/834, ABP 311157)
- Bunnahowen (Operational – PI Ref. 18/873)
- Kilalla (Operational – PI Ref. 19/260)
- Oweninny Phase 1 (Operational, ABP PA0029)
- Oweninny Phase 2 (Under Construction)

- Oweninny Phase 3 (Pre-Application Phase – ABP 309375)
- Kilsallagh Wind Farm (Pre-Application Phase – ABP 312282)
- Glenora Wind Farm (Pre-Application Phase - ABP Ref. 310528)

As there is very limited information publicly available for the proposed Kilsallagh Wind Farm, which is at Pre-Application Phase, this project has been screened out for cumulative assessment. Any cumulative effects arising from the rest of the projects listed are considered in the relevant chapters of this EIAR.

2.8.2.2 Other Developments/Land uses

The review of the Mayo County Council planning register documented relevant general development planning applications in the vicinity of the Proposed Development site, all of which relate to the provision and/or alteration of one-off rural housing, as described in Planning History, Section 2.5 of this Chapter. These applications and land uses have also been taken account in describing the baseline environment and in the relevant assessments.

Furthermore, the cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider all potential significant cumulative effects arising from all land uses in the vicinity of the Proposed Development. These include permitted and existing wind farms in the area, and ongoing agricultural practices/forestry practices. The OPW (www.floodinfo.ie) does not record the presence of any Arterial Drainage Schemes or Benefited Lands within the proposed Wind Farm site, along the Grid Connection route or in the surrounding lands.

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

2.8.2.3 Forestry Felling and Replanting

Forestry Operations

The Proposed Development site is used for commercial forestry. This land-use will continue in conjunction with the operation and decommissioning of the proposed wind farm. The potential for cumulative effects during the construction, operational and decommissioning phases of the proposed wind farm have therefore been assessed.

Forestry Felling associated with Proposed Development

The Forest Service is responsible for ensuring the development of Forestry within Ireland occurs in a manner and to a scale that maximises its contribution to national socio-economic well-being on a sustainable basis that is compatible with the protection of the environment. The forestry felling associated with the Proposed Development will be carried out under the relevant guidance and under licence from the Forest Service and full details are set out in Section 4.9.1 of this EIAR. In line with the Forest Service's published policy on granting felling licences for wind farm developments, areas cleared of forestry for turbine bases, access roads, and any other wind farm-related uses will have to be replaced by replanting at an alternative site or sites. The Forest Service policy requires replacement or replanting on a hectare for hectare basis for the footprint of the turbines and the other infrastructure.

Replacement of Forestry

The replacement of forestry, felled as part of the proposed development, may occur on any lands, within the state, benefitting from Forest Service Technical Approval¹⁰ for afforestation, should the Proposed Development receive planning permission. Under the Forestry Regulations 2017, all applications for licences for afforestation require the prior written approval (technical approval) of the Minister for Agriculture, Food and the Marine.

The requirements for afforestation licencing are set out in the Forestry Regulations 2017 – this includes consideration of Environmental Impact Assessment and Appropriate Assessment as set out in parts 7 and 8 of the Regulations, respectively. Further detail is set out in the Environmental Requirements for Afforestation (DAFM, 2016)¹¹. This ensures that afforestation takes place in a way that complies with environmental legislation and enhances the contribution new woodlands and forests can make to the environment and to the provision of ecosystem services, such as water protection and landscape enhancement.

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

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

Furthermore, as mentioned above, the key environmental issues relating to afforestation include water, biodiversity, archaeology, and landscape. Each is subject to regular updates in terms of best practice, guidelines, standards and national policies. Delaying the identification of alternative afforestation lands until such time as they are required enables identification of optimum lands available (from an environmental perspective) for afforestation at that time.

For the purposes of this project, the applicant commits that the location of any replanting (alternative afforestation) associated with the project will be greater than 10km from the wind farm site and also outside any potential hydrological pathways of connectivity (i.e. outside the catchment within which the proposed project is located) with the proposed project. On this basis, it is reasonable to conclude that there will be no more than imperceptible in-combination cumulative effects associated with the replanting. Therefore, forestry replanting is not considered further in the impact assessment chapters of this EIAR.

In addition, the applicant commits to not commencing the project until both a felling and afforestation licence(s) is in place and, therefore, this ensures the afforested lands are identified, assessed and licenced appropriately by the relevant consenting authority.

Further details in relation to the consideration of forestry replanting is included in Appendix 2-4 and Chapter 4, Section 4.3.10.1 of this EIAR.

¹⁰ All proposed forestry developments where the area involved is greater than 0.1 hectare must receive the prior written approval of the Forest Service. The application for approval is known as Pre-Planting Approval – Form 1.

¹¹ <https://www.gov.ie/en/publication/642e6-forestry/#environmental-requirements>