

# Planning Report

## Glenora Wind Farm





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# EXECUTIVE SUMMARY

This Planning Report was prepared to provide a rationale for the provision of the Proposed Development in Glenora and adjacent townlands near the village of Ballycastle Co. Mayo. The Proposed Development is being brought forward in response to Local, National, Regional, and European policy regarding Ireland's transition to a low carbon economy, associated climate change policy objectives and to reduce Ireland's dependence on imported fossil fuels to produce electricity. This document should be read in conjunction with all other documents submitted with this planning application. The Proposed Development has been deemed to constitute a Strategic Infrastructure Development (SID) and therefore this planning application will be made directly to An Bord Pleanála (ABP).

The Proposed Development has been informed by several key climate and energy related policy documents. These include *inter alia*:

- > RePowerEU Plan
- > Renewable Energy Directive 2009/28/EC (as amended)
- > National Planning Framework
- > National Energy Security Framework
- > The Climate Action and Low Carbon Development (Amendment) Act (2021)
- > Climate Action Plan 2023
- > Mayo County Development Plan 2022-2028 (CDP)
- > Mayo Renewable Energy Strategy 2011-2020 (RES)

Further details on how the Proposed Development complies with these documents can be found in Section 4 and in Chapter 2 of the Environmental Impact Assessment Report (EIAR) which accompanies this planning application.

It is also noted throughout this Planning Report that the policy context surrounding climate change and the provision of renewable energy developments has altered significantly since the introduction of the RES in 2011. This is further emphasised herein Table 8.

From an evaluation of the relevant policy documents, it was concluded that the Proposed Development is fully in compliance with the International, National, Regional and Local policy documents of relevance to the Proposed Development.

The RES sets out a tiered classification system for lands which are considered suitable for wind energy developments. Notwithstanding this classification, the RES states:

*“Notwithstanding the potential areas identified in this Strategy all proposed renewable developments will be assessed on the principles of proper planning and sustainable development, ensuring minimal adverse environmental impact, including flooding, and taking full account of the presence and requirement to protect all Natura 2000 sites and (proposed) Natural Heritage Sites. Projects will be subject to Habitats Directive Assessment where considered appropriate. <sup>1</sup>”*

7 No. turbines proposed in the Proposed Development site are located within Tier 1 (Large Windfarm) and Tier 2 (Open for Consideration) lands for wind turbine provision in the Mayo RES. The remaining areas of the proposed site, although unclassified, share similar characteristics and suitability factors with the classified lands and the areas where the turbines are proposed all have identical landcover within a highly modified landscape of low landscape sensitivity. 15 No. turbines are proposed on lands that are unclassified in the RES. It's important to emphasize that the RES does not explicitly prohibit the

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<sup>1</sup> Renewable Energy Strategy for Co. Mayo 2011 – 2020, pg 52

placement of turbines in "unclassified" areas. Furthermore, as a portion of the Proposed Development site is located within both the Tier 1 and Tier 2 designation in the RES, the Proposed Development represents an excellent opportunity to develop wind energy and make the most efficient use of strategically zoned lands in accordance with national and local renewable energy targets.

As the Proposed Development is in line with the relevant policy documents in particular the mitigation measures set out in the RES, it is considered that the Proposed Development is in compliance with the principles of proper planning and sustainable development, the principal development is acceptable and therefore it should be assessed on its merits by the An Bord Pleanála.

Furthermore, it is considered that the Proposed Development does not materially contravene the provisions of the CDP or the RES, however, if the Board were to take a different view, it is noted that the Proposed Development is strongly supported by National, Regional and Local Planning Policy and Statutory Guidelines.

In this regard, it is noted that Section 37(G)(6) of the Planning and Development Act 2000 (as amended) ('the Act') allows the Board to: "*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.*" Therefore, if even the Board determined that the Proposed Development materially contravenes the Development Plan, the Board has the power to grant planning permission. We respectfully submit that the Proposed Development is in accordance with proper planning and sustainable development and should be granted planning permission.

This Planning Report also outlines the rationale for the areas where the turbines are proposed to be placed as being appropriate for the siting of turbines. The "unclassified" lands within the Proposed Development site share the same characteristics as the Tier 1 and Tier 2 areas in terms of proper planning and sustainable development principles due to their identical landcover and topography, and therefore the entire site should be considered as a mix of Tier 1 and Tier 2. Furthermore, all viable sites will need to be considered for wind energy development in order to meet national climate and renewable energy targets, in particular those that include strategic wind energy designations, and otherwise have the same landcover characteristics and sensitivity as the designated areas, such as the subject site.

The Proposed Development complies with all the necessary setback requirements and mitigation criteria set out in the statutory guidelines and the RES and has been designed fully in accordance with proper planning and sustainable development. The Proposed Development site is not located within a Special Protection Area or a Special area of Conservation. Furthermore, the ecological and environmental conclusions of the ELAR state that the Proposed Development site is suitable for wind energy. These are summarised in Section 4.5.2 of this report. An overview of the detailed design process is provided in Section 3, which sets out how the design of the Proposed Development has incorporated all relevant design constraints, including set-back requirements, buffers and exclusion zones.

# 1. INTRODUCTION

This Planning Report has been prepared by MKO on behalf of the Applicant, Glenora Wind Farm DAC. The purpose of this report is to support a planning application for the Proposed Development and set out how it is in compliance with the relevant planning policy and how it aligns with national climate policy and Ireland's binding legal commitment to reach net zero by 2050, as required by the Climate Action and Low Carbon Development Act (as amended). This Planning Report accompanies a Strategic Infrastructure Development (SID) application being made directly to ABP under the provisions of Section 37E of the Planning and Development Act 2000 (as amended) ('the Act'). Following pre-planning consultations, ABP determined this project to be SID on 9<sup>th</sup> of May 2023.

This report includes a background to the project, details on the Proposed Development, and an assessment of Proposed Development against the relevant International, National, Regional and Local planning and renewable energy policy that applies. This report demonstrates that the Proposed Development is consistent with the relevant policy applicable to the Proposed Development.

In setting out the policy context that applies to the Proposed Development, it is clear that there is broad support for renewable energy in principle in the RES, as well as the current Mayo County Development Plan 2022-2028, and that the County is committed to delivering renewable energy in line with national policy.

However, as mentioned previously, the strategic policy on which the RES was based has now changed significantly, and there is now an increased urgency for the accelerated delivery of renewable energy, in order to meet international and national renewable energy targets, that was not present when the current RES for Mayo was adopted in 2011. For example, three Climate Action Plans (2019, 2021, 2023) have now been published by the Irish Government since the adoption of the RES in 2016 committing the State to achieving 9GW of onshore wind and 80% RESE by 2030.

This has resulted in a scenario where the RES is at odds with international and national policy including *inter alia* the Climate Action Plan, REPowerEU and the National Energy Security Framework.

Finally, an overview of the detailed design process is also provided, which sets out how the design of the Proposed Development has incorporated all relevant design constraints, including set-back requirements, buffers and exclusion zones.

## 1.1 Summary of Proposed Development

The Proposed Development will consist of 22 no. wind turbines with a blade tip height of 180 metres (m) above the top of the foundation. The projected output of the proposed wind farm is estimated to be c. 158.4 MW, based on an anticipated turbine capacity of 7.2 MW each. It is intended to connect the Proposed Development to the national electricity grid via a 110kV underground cable which will connect the Proposed Development to the existing Tawnaghmore 110kV substation, located 14km southeast of the intended on-site 110kV substation, in the townland of Tawnaghmore Upper. The grid connection cabling route will measure approximately 26km in length. The grid connection does not form part of the subject application and it is intended to apply for planning permission for the grid connection separately.

## Report Structure

The report is structured as follows:

- > **Introduction**
- > **Project Background** – (including the applicant, site context, planning history and pre-planning consultation)
- > **Proposed Development** – (including an overview and the Project Design Process)
- > **Planning Policy Appraisal** – (including international, national, regional and local policy)
- > **Conclusion**



## 2. PROJECT BACKGROUND

### 2.1 The Applicant

The applicant, Glenora Wind Farm DAC, is a joint venture between SSE Renewables and FuturEnergy Ireland. SSE Renewables is a leading developer and operator of renewable energy across the UK and Ireland, with a portfolio of around 4GW of onshore wind, offshore wind and hydro. SSE Renewables owns over 700MW of operational onshore wind farms in locations across the Republic of Ireland. These include Ireland's largest wind farm, the 174MW Galway Wind Park in Connemara, County Galway, which is co-owned with Greencoat Renewables.

FuturEnergy Ireland is a new joint venture company owned on a 50:50 basis by Coillte and ESB. Their ambition is to develop more than 1GW of renewable energy capacity by 2030 and make a significant contribution to Ireland's commitment to produce 80% of electricity from renewable sources by the end of the decade.

FuturEnergy Ireland has recently received planning permission for Castlebanny Wind Farm (Co. Kilkenny) and Carrownagowan Wind Farm (Co. Clare) and also has a number of proposed wind energy projects currently in the planning system.

### 2.2 Site Location and Context

The area where the turbines are proposed is located in a remote setting northwest of County Mayo, approximately 6km southwest of the village of Ballycastle and 5km south of the Atlantic Coastline, in north County Mayo. The area where the turbines are proposed is accessible via an existing forestry access road which runs along the eastern boundary of the site in the townland of Glenora. The existing forestry access road merges with the Ballyglass local road approximately 4.7km to the northeast of the area where the turbines are proposed in the townland of Ballyglass. The Ballyglass local road meets the R314 approximately 1.6km further east.

The area where the turbines are proposed is currently used for commercial forestry, with widespread young to mature forestry coverage. It should be noted that the areas where the turbines are located within the Proposed Development site all have identical landcover. This is a highly modified landscape of low landscape value and sensitivity. Within the area where the turbines are proposed, are forest tracks which provide access throughout the site. The Proposed Development site is drained by the Sralagagh, Glenora and Fiddaundoo watercourses which drain southwards into the Altderg River and the Keerglen River which flows eastwards through the area where the turbines are proposed.

The Inagh Bog Natural Heritage Area (NHA) is located to the west and the Ummerantary Bog NHA is located to the south of the area where the turbines are proposed. Within the wider landscape there are several more designated sites.

Wind energy is also a significant land-use in the vicinity and includes the operating Bellacorick and Oweninny I Wind Farms, the consented ABO Sheskin Wind Farm, and phase II of Oweninny Wind Farm which is currently under construction.

The operational Oweninny I Wind Farm and Bellacorick Wind Farms are located between 5.6km and 9.3km to the south of the site. The Consented ABO Sheskin Wind Farm is located 6km to the southwest.

Details of all operating and permitted wind farms within 20km of the site are set out in Chapter 2 of the EIAR.

In addition to forestry and wind energy, other land-uses in the surrounding area include agriculture, peat-cutting and low to medium-density residential areas. Grid infrastructure in the area includes the

Bellacorick 38kV and 110kV substation located approximately 13km south of the proposed site off the N59 road. The nearest 110kV lines run from the Bellacorick substation and terminate at the Moy 110kV substation 13km south of the site boundary. A 110kV line runs from the Tawnaghmore peaker plant 14km east of the study site and joins the Moy substation 8km to its south.

## 2.3 Planning History

### 2.3.1 Planning History of the Area Where the Turbines are Proposed.

#### 2.3.1.1 Mayo County Council – Proposed Airtricity Glenora Wind Farm (Planning Reference 03/1383)

On the 11<sup>th</sup> of June 2003, Airtricity Developments (Ireland) LTD & Coillte Teoranta applied for planning permission for the following development:

*“construct a wind farm consisting of 29 wind turbines (max hub height of 65m and max blade diameter 80m, with a total height not exceeding 100m), a 110 kv substation including pylon and control building, one 65m high meteorological mast, construction and upgrading of site entrances, site tracks and associate works”.*

After receiving a request for additional information from Mayo County Council (MCC) on August 1, 2003, which was duly addressed by the applicant, permission for the Proposed Development was refused by MCC on February 17, 2004. The Planning Officer cited, among other reasons, the following grounds for refusal:

*“The proposed development is premature in the **absence of a comprehensive wind energy strategy** for the county, and it is an objective of the Mayo County Developing Plan 2003- 2009 to prepare such a strategy as a matter of priority. The proposed development would seriously prejudice the outcome of such a strategy and the proposed development would therefore be contrary to the proper planning and development of the area” [Emphasis Added]*

*“Insufficient information has been submitted with the application to determine the exact effects that proposed development will have on the surrounding area, an area designated as vulnerable in the landscape appraisal in the Mayo county development plan 2003 - 2009. In particular the applicant has not adequately addressed the potential impact of the proposed development on the visual amenity, water quality and ground conditions of the area.”*

This decision by MCC was subject to a first party appeal. In refusing permission for the development, ABP set out 2 No. grounds for refusal. These reasons concerned the location of the proposed site on the slopes of Maumakeogh Mountain and the potential visual prominence of the development on at this location. It was also outlined by ABP that:

*“it is considered that the proposed wind farm sited at this location, which would be inter visible with existing on permitted wind farm developments at Bellacorick would constitute unobtrusive development which would detract from the rural character and scenic amenities of this sensitive and vulnerable area”.*

The second reason made reference to the absence of a wind energy strategy for county Mayo:

*“It is considered that the proposed wind farm development at this location would be premature pending the preparation of a wind energy strategy for county Mayo”.*

Considering the previously mentioned grounds for refusal, it's essential to highlight that MCC adopted a Renewable Energy Strategy in 2011, and a thorough Environmental Impact Assessment Report (EIAR) accompanies this application. Consequently, these reasons for refusal are not applicable to the Proposed Development.

Furthermore, it's important to note that the planning policy has undergone substantial changes since 2003, with a clear shift in favour of renewable energy projects, exemplified by the introduction of Renewable Energy Strategies. This policy context is set out in detail in section 4 of this Report.

In this context, it must be emphasised that since 2003 Ireland has enshrined in law a target of reaching 80% renewable electricity by 2030 and net zero emissions by 2050. Action at a local authority level is critical to secure the delivery of the required 9GW of onshore wind required by 2030. Ireland's current installed capacity is c. 5GW which points to the need for a substantial increase in deployment in the coming years if we are to reach our climate targets.

### 2.3.1.2 Planning History of the Wider Area

It is clear that MCC recognises the potential of the county for the development of renewable energy projects, and in particular onshore wind, stating in the Development Plan that:

*“Mayo County Council is a leader in the development of renewable energy, with Ireland’s first commercial wind farm at Bellacorick, Co Mayo in 1992. The Council recognises that a safe, secure, sustainable and affordable supply of energy is of central importance to the economic and social wellbeing of County Mayo. Continued development of renewable energy sources in Mayo will help Ireland achieve our national targets. Mayo has an enormous wind resource with the potential to underpin an entire new economy in the county.”*

It is worth noting that a significant amount of wind energy has been permitted in the area surrounding the subject site which has contributed to the County becoming a centre of excellence for renewable energy. Table 1 below outlines the applications made for wind energy in north County Mayo post 2013 which have been granted planning permission.

Table 1: Wind Energy Applications within 20km of the Proposed Development which have been Granted Planning Permission

Pl. Ref	Description	Decision
<b>Bellacorick Wind Farm</b>		
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	Granted by ABP 31/08/2022 subject to 7 conditions.
Mayo CC Ref: 19457	Amendments to existing planning permission PL5/825 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	Granted by MCC 28/01/2020 subject to 51 conditions.

	line boundary and all other aspects of the permitted development will remain unchanged.	
<b>Oweninny Wind Farm</b>		
ABP: PA0029	Proposed Oweninny Wind Farm and associated works, Bellacorick,	Granted by ABP 02/06/2016 subject to 20 conditions
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
ABP: 316178	Proposed development of Oweninny Wind Farm Phase 3 consisting of 18 wind turbines.	Decision due by 29/09/2023
<b>Killala Community Wind Farm</b>		
17619	10 Year planning permission for 5 turbine wind farm. Proposed Development will be located in the townlands of Magherabrack, Mullafarry, Tawnaghmore Lower, Meelick and Tawnaghmore Upper, Killala approx. 1.3km south of Killala. development is an updated application to the consented 6 turbine wind farm p09/780. proposal is for a wind energy development comprising 5 electricity generating wind turbines, each with a rotor diameter not exceeding 103.2m a hub height not exceeding 73.5m and a blade tip height of not exceeding 126m. the development will include a meteorological mast not exceed 82m in height, internal underground electrical cabling, a substation building, an external underground grid connection cable and ducting to the existing 110kv Tawnaghmore substation, associated grid substation works, associated site access roads and ancillary site works including upgrades to existing site access, a temporary construction compound and haulage route works. the max output capacity of the wind farm will be up to 18mw and has an intended operation life of 25 years	Granted by MCC 15/02/2018 subject to 19 conditions
19260	25 Year permission for a single electricity generating wind turbine with an overall maximum height of up to 125m. The development will also consist of a turbine hardstand, access track of c.394m, internal cable trench of c.1,775m and ancillary site works. The planning application is accompanied by a Natura Impact Statement	Granted by MCC 15/10/2019 subject to 12 conditions
<b>Dooleg More Single Turbine</b>		
20467	Single wind turbine generator and 20kV grid connection to Bellacorick 110kV substation	Granted by MCC 25/03/2021 subject to 15 conditions
<b>Bunnahowen Wind Farm</b>		
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

As demonstrated in Table 1 above, it is clear that both MCC and ABP support the provision of wind energy infrastructure in north County Mayo. These wind energy applications have contributed to Mayo becoming a “*centre of excellence for renewable energy research and development*”<sup>2</sup> which is in line with the policy of the County Development Plan. There is a clear precedent for wind energy developments in the area of North County Mayo.

<sup>2</sup> Mayo County Development Plan 2022 – 2028 Renewable Energy Policy 6 - pg215

## 2.4 Pre-Application Engagement

### 2.4.1 Mayo County Council

Before submitting this planning application, the prospective applicant and the design team engaged with Mayo County Council. The first meeting, held via MS Teams on September 9, 2021, included representatives from Mayo County Council, MKO, SSE, and Coillte. During this meeting, the team presented a PowerPoint introduction to the site and development plans, outlining the Strategic Infrastructure Development (SID) criteria and emphasizing the application's submission to ABP under the SID designation. 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 Turbine Delivery Route

### 2.4.2 An Bord Pleanála

An initial pre-application meeting with ABP took place on September 22, 2021, via MS Teams and featured participants from SSE, MKO, and ABP. During this meeting, the Board requested the prospective applicant to present the nature of the Proposed Developments and identify any specific areas in which it sought feedback from the Board. 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 the Board was held on 3<sup>rd</sup> 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 22<sup>nd</sup> September 2021, explaining that turbine locations have remained consistent since the last meeting and that the project exceeds the 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.

A letter received from ABP dated the 9<sup>th</sup> of May 2023 stated that the under Section 37B (4)(A) that it is the opinion that the Proposed Development falls within the scope of the paragraphs 37A(2)(a) and (b) of the Planning and Development Act 2000 (as amended). This confirmed that the Proposed Development constitutes SID and therefore the planning application must be made directly to ABP.

### 3. PROPOSED DEVELOPMENT

#### 3.1 Overview

The proposed wind farm development comprises the construction of 22 No. wind turbines and all associated works. The proposed turbines will have a blade tip height of 180 metres above the top of the foundation. The applicant is seeking a ten-year planning permission. The full description of the proposed wind farm development, as per the public planning notices, is as follows:

*The proposed development will constitute of the following:*

- (i) *The construction of 22 no. wind turbines and all associated hard-standing areas with the following parameters:*
  - a. *A total blade tip height of 180m,*
  - b. *Hub height of 99m, and*
  - c. *Rotor diameter of 162m;*
- (ii) *1 no. permanent Meteorological Anemometry Masts with a height of 99 m and associated hardstanding area;*
- (iii) *Upgrade of existing tracks and roads, provision of new permanent site access roads and upgrade of 1 no. existing site entrance including the provision of 1 no. security cabin with automatic traffic barriers;*
- (iv) *Temporary widening of sections of public road in the townland of Ballyglass;*
- (v) *The provision of a new temporary roadway in the townland of Ballyglass to facilitate the delivery of turbine components and other abnormal loads;*
- (vi) *1 no. wind farm operation and maintenance control building in the townland of Glenora;*
- (vii) *3 no. borrow pits;*
- (viii) *13 no. permanent peat placement areas;*
- (ix) *5 no. temporary construction compounds with temporary site offices and staff facilities;*
- (x) *Permanent recreation and amenity works, including marked trails, seating areas, amenity car park, and associated amenity signage;*
- (xi) *Site drainage;*
- (xii) *Site signage;*
- (xiii) *Ancillary forestry felling to facilitate construction and operation of the proposed development;*
- (xiv) *All works associated with the habitat enhancement and biodiversity management within the proposed wind farm site;*
- (xv) *All associated site development works and ancillary infrastructure.*

*This application is seeking a 10-year planning permission and 35-year operational life of the Proposed Development from the date of commissioning of the entire Proposed Development.*

## 3.2 Main Development Components

### 3.2.1 Wind Turbines

The proposed wind turbine layout has been optimised using industry standard wind farm design software to maximise the energy yield from the site, while maintaining sufficient distances between the proposed turbines to ensure turbulence and wake effects do not compromise turbine performance. The proposed wind turbines to be installed on the site will have the following dimensions:

- Turbine Foundation-to-Blade Tip Height: 180 metres
- Hub Height: 99 metres
- Rotor Diameter: 162 metres

### 3.2.2 Turbine Foundations

Each wind turbine is anchored to a concrete foundation whose size is determined by the turbine manufacturer. The final choice of turbines will be based on a competitive tender process. Different turbine manufacturers employ various foundation shapes, such as circular, hexagonal, or square, to accommodate modern turbine models. The foundation's purpose is to transmit the wind turbine's load into the ground. The footprint of each proposed turbine's foundation is assessed in the accompanying EIAR.

Once the foundation level is established on solid strata (bedrock or load-bearing subsoil) or through piling methods, the lower section of the turbine tower, known as the "Anchor Cage," is levelled, and reinforcing steel is added around it. The exterior of the foundation is shuttered with temporary formwork to facilitate concrete pouring and is backfilled with appropriate granular fill to reach the desired surface level.

### 3.2.3 Site Roads

To access and interconnect the wind turbines and associated infrastructure on the Proposed Development site, it is proposed that 15.4 kilometres of existing roads and tracks will be upgraded, and 10.5 kilometres of new access roads will be constructed.

The two proposed road construction types are as follows:

1. Upgrading of Existing Roads: Involving excavation and replacement.
2. Proposed New Roads: Also involving excavation and replacement.

The locations where these construction types are proposed are detailed in Figure 1-1 of Fehily Timoney & Company's Peat & Spoil Management Plan, included in Appendix 4-2 of the EIAR. The floated road construction technique will not be utilized during the Proposed Development's construction.

The road design takes into account essential factors like buildability, serviceability for construction and turbine access, minimizing excavation, and avoiding disruption to peat hydrology. However, the specific construction technique for each road segment will depend on the ground conditions encountered following confirmatory assessments. Additionally, the upgraded and new roads will include passing bays, wider sections facilitating easy traffic flow on the site.

### 3.2.4 Other Works

Some other works for the Proposed Development include *inter alia*:

- 2 No. wind farm control buildings
- 1 No. Meteorological mast
- 14 No. peat placement areas
- 5 No. Construction compound



- Hard standing areas
- 11 No. watercourse crossings
- 3 No. Borrow pits
- Rock breaking/ blasting
- Tree felling

It should be noted that all of these works have been assessed and are further detailed within the accompanying EIAR.

### 3.3 Project Design Process

At the beginning of the project design process, MKO carried out a constraints mapping exercise in order to determine the viable areas for turbine placement at the site. This process was carried out in order to ensure that the Proposed Development is in line with the principles of proper planning and sustainable development. The constraints mapping process establishes buffer zones around relevant constraints, ensuring that development works avoid these areas where possible. The sizes of these buffer zones are determined based on the standards provided in the wind energy guidance documents outlined in Section 4 of this Report.

The site's constraints maps encompass various constraints and their associated buffer zones including the following:

- Residential dwellings plus a minimum 720 metre buffer (meeting the requirement of 4 x tip height separation distance as required by the Draft Wind Energy Guidelines 2019) (Refer to Chapter 5 of EIAR) (although these guidelines are not adopted, this specific constraint is widely recognised as best practice in the industry so was applied as a site constraint);
- Designated sites plus 100 metre buffer (Refer to Chapter 6 of EIAR);
- Rivers and streams plus 50 metre buffer (Refer to Chapter 9 of EIAR);
- Recorded Archaeological Sites and Monuments/Protected Structures plus 50 metre buffer (Refer to Chapter 12 of the EIAR);
- Geotechnical Construction Buffer Zones (Refer to Appendix 8-1 of this EIAR);
- Western Way walking route plus 180m buffer;
- Visual Impact Exclusion Zone (elevations above 240m OD) (Refer to Chapter 12 of this EIAR).

Once these constraints were applied, it left a “remaining viable area”. This is where the turbines have been placed. Figure 4 below demonstrates the constraints mapping of the Proposed Development site.



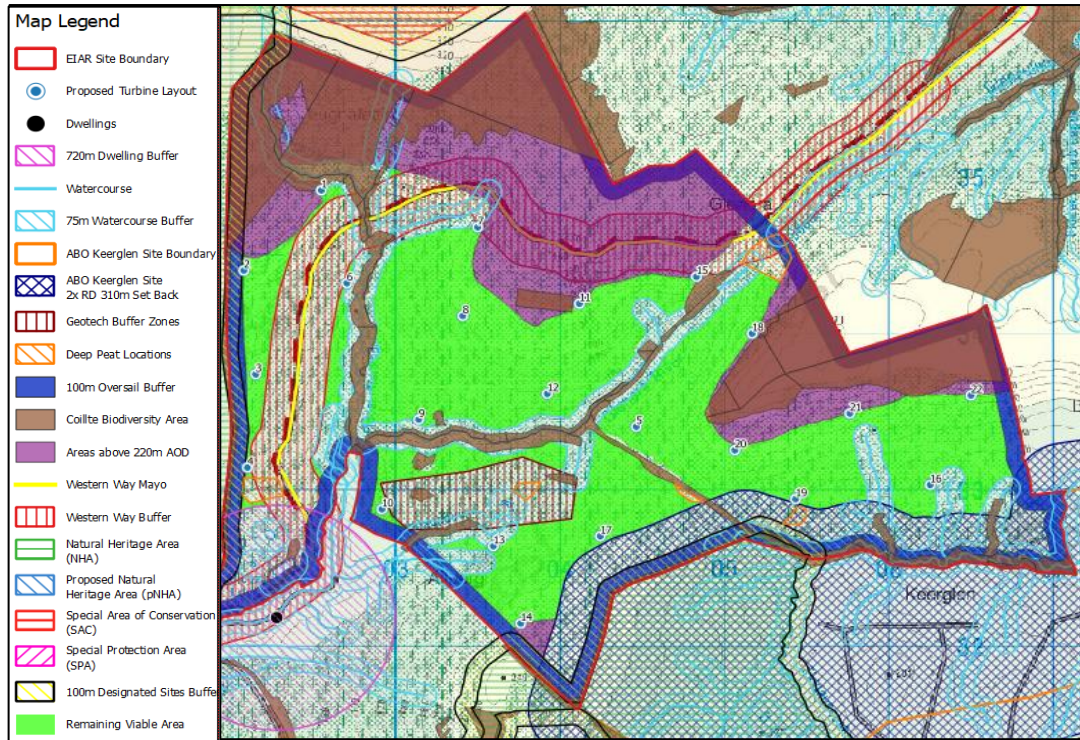


Figure 1. Constraints Map of the Proposed Development Site

### 3.3.1 Initial Turbine Layout

Several reviews were conducted regarding the specific placement of the turbines while optimizing the site layout. The initial constraints study identified a substantial area suitable for development within the broader study zone. Initially, the layout included 14 turbines, as depicted in Figure 5, situated within this viable area. However, after receiving input from the project team, the turbine layout was refined.

The selected turbine arrangement is considered optimal because the initial layout did not fully harness the site's wind potential, as in the final selected turbine layout.



Figure 2. Initial Turbine Layout

### 3.3.2

## Second and Final Version of the Turbine Layout

The revised turbine arrangement, as depicted in Figure 6, incorporated 8 additional turbines within the “viable area” shaded green in Figure 4 above, bringing the total to 22 turbines. This adjustment followed a thorough evaluation of the available area and the required distances between the proposed turbine placements. This layout optimally utilizes the wind resource and potential power generation capacity of the site, all while adhering to the necessary setbacks from residential properties, watercourses, designated sites, and neighbouring wind energy projects. Furthermore, it maintains a maximum turbine base elevation of 240 meters OD to minimize landscape and visual impacts on the northwest ridgeline.





Figure 3. Second Turbine Layout

The last and definitive version of the turbine layout also encompassed the micro siting of turbine locations through a meticulous evaluation of local ground conditions, including geotechnical, hydrological, and ecological factors, until the ultimate turbine positions were settled upon for the planning application. Additionally, an extended setback was implemented along the Western Way walking route. The turbine layout presented in Figure 7 below is the final layout that is being proposed pursuant to this planning application.



Figure 4. Third and Final Turbine Layout

### 3.3.3 Summary

Based on the detailed design process, a proposal has been developed, having regard to all relevant environmental and technical constraints resulting in a proposed wind farm that is commercially viable and with environmental impacts mitigated appropriately. This process was carried out in order to ensure the Proposed Development is in line with the principles of proposed planning and sustainable development and to ensure minimal adverse impact on the receiving environment as per the Mayo RES which for clarity states:

*“Notwithstanding the potential areas identified in this Strategy **all proposed renewable developments will be assessed on the principles of proper planning and sustainable development**, ensuring minimal adverse environmental impact, including flooding, and taking full account of the presence and requirement to protect all Natura 2000 sites and (proposed) Natural Heritage Sites. Projects will be subject to Habitats Directive Assessment where considered appropriate.”* [Emphasis Added]

The resulting final design envisions the installation of 22 no. turbines with a maximum proposed tip height of 180m, rotor diameter of 162m, and an estimated turbine output of 158.4MW.

## 3.4 Strategic Infrastructure Development

It must be noted that the subject development has been confirmed as a Strategic Infrastructure Development (SID) by 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, ABP can grant permission for the development of wind turbines outside of classified areas for wind farm developments even if ABP considers that it would result in a material contravention of the Development Plan. It is our view that the Proposed Development does **not** materially contravene the Development Plan, due to the statement within the RES which allows all applications to be considered on their merits, however we note that the Board will consider the Development Plan as part of determining the planning application.

As set out in this Planning Report, we submit that the Proposed Development is in accordance with proper planning and sustainable development and strongly supported by National, Regional and Local Planning Policy and Statutory Guidelines.

## 4. PLANNING POLICY APPRAISAL

### 4.1 Policy Introduction

The following section provides an appraisal of the Proposed Development against the relevant international, national, regional, and local planning policy framework.

It should be noted that while a portion of the site area is located in unclassified lands, the Proposed Development complies with the policies and objectives of the Development Plan and the RES and is consistent with the mitigation criteria for wind farms set out in the RES.

Furthermore, it is noted that a significant amount of climate and energy policy development has taken place since the adoption of the RES in 2011, altering significantly the planning, energy and climate policy landscape since its adoption.

These policy developments, particularly the International, National and Regional policies are put into context with the local RES, which as detailed in the following section, was adopted prior to many of the most important climate and energy related policies that now apply and remains unchanged in the Mayo County Development Plan 2022-2028.

As is detailed in the following sections, the policy context that applies to the Proposed Development is characterised by a number of crises that have taken centre stage recently and have been the main drivers behind a large portion of the policy development that have taken place in the last number of years.

On a European level, the targets for renewable energy as set out in the Renewable Energy Directive (2009/28/EC) have increased steadily, from a 20% renewables target by 2020 first set in 2009, a 32% target for 2030 set in 2018, and more recently a provisional agreement to increase the 2030 target to at least 42.5% by 2030.<sup>3</sup>

The energy crisis has required an urgent shift in energy security policy across the EU, as a result of the war in Ukraine. REPowerEU (2022) now requires EU member states to urgently move away from imported fossil fuels and accelerate the scale up of renewables in the overriding public interest.

On a national level, the Climate Action and Low Carbon Development Act (2021) brought into law for the first time the requirement for the State to reduce its carbon emissions by 51% by 2030 and climate neutrality by 2050.

Three Climate Action Plans (2019, 2021, 2023) have been adopted since the adoption of the Mayo RES in 2011 committing the State to achieving 9GW of onshore wind and 80% RES-E by 2030.

The National Energy Security Framework was Adopted in 2022 and implements many of the aims and objectives of REPowerEU on a national level, reinforcing the State's requirement to urgently diversify away from imported fossil fuels and accelerate the roll out of renewables.

This section shows that the planning, and in particular the climate and energy policy landscape is strongly supportive of the Proposed Development and has altered significantly since the RES has been adopted and it should be seen in this context.

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<sup>3</sup> [https://energy.ec.europa.eu/topics/renewable-energy/renewable-energy-directive-targets-and-rules/renewable-energy-directive\\_en](https://energy.ec.europa.eu/topics/renewable-energy/renewable-energy-directive-targets-and-rules/renewable-energy-directive_en)

## 4.2 International Policy

### 4.2.1 European Climate Law (2021)

The European Climate Law entered into force on 29 July 2021 and writes into law the goal set out in the European Green Deal for Europe's economy and society to become climate-neutral by 2050. The law also sets the intermediate target of reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels.

#### Objectives

- Set the long-term direction of travel for meeting the 2050 climate neutrality objective through all policies, in a socially fair and cost-efficient manner;
- Set a more ambitious EU 2030 target, to set Europe on a responsible path to becoming climate-neutral by 2050;
- Create a system for monitoring progress and take further action if needed;
- Provide predictability for investors and other economic actors;
- Ensure that the transition to climate neutrality is irreversible.

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 14<sup>th</sup> July 2021, the European Commission adopted a set of proposals 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.

The Proposed Development would be a step in the right direction to reaching the climate goals set out above. The integration of increased renewable energy onto the grid would lessen the reliance on carbon intensive forms of electricity generation and thereby reduce reliance on fossil fuels. This would thereby have a positive impact on reducing net greenhouse gas emissions.

### 4.2.2 REPowerEU

Published in response to Russia's invasion of Ukraine, REPowerEU aims to accelerate the energy transition and increase Europe's energy independence. The European Commission proposed the RePowerEU plan to make Europe independent from Russian fossil fuels including oil and gas, due to the high and volatile energy prices, and security of supply concerns following Russia's unprecedented military attack on Ukraine.

A key pillar of REPowerEU includes reducing faster the use of fossil fuels by boosting energy efficiency, **increasing renewables**, and addressing infrastructure bottlenecks.

*"There is a double urgency to reduce Europe's energy dependence: the climate crisis, compounded by Russia's aggression and EU's dependence on fossil fuels, which Russia uses as an economic and political weapon.*

*The green transformation of Europe's energy system will strengthen economic growth, reinforce its industrial leadership, and put Europe on a path towards climate neutrality by 2050.*



*The European Commission calls on leaders, Member States, regional and local authorities, and indeed every citizen and business, to reduce Europe's energy dependence from Russia through the implementation of [the] REPowerEU plan”.*

REPowerEU places renewable energy in the ‘**overriding public interest**’ acknowledging the urgency required to accelerate the roll out of renewables:

In December 2022 a text of the proposal for a Council Regulation laying down a framework to accelerate the deployment of renewable energy was agreed by the European Council and published by the European Council<sup>4</sup>. The Regulation specifically seeks to accelerate the deployment of renewable energy sources, by means of targeted measures which are capable of accelerating the pace of deployment of renewables in the European Union in the short term. The regulation focuses therefore on measures which are implementable rapidly at the Member State level, namely the streamlining of the permit-granting processes applicable to renewable energy projects.

In that regard, the Regulation introduces the presumption that, as per Section 7 of the regulation:

*“One of the temporary measures consists of the introduction of a rebuttable presumption **that renewable energy projects are of overriding public interest** and serving public health and safety for the purposes of the relevant Union environmental legislation, except where there is clear evidence that those projects have major adverse effects on the environment which cannot be mitigated or compensated for.”*

It is clear from the urgency conveyed by the REPowerEU plan and the provisions set out in the Regulation that the accelerated deployment of renewable energy is crucial to mitigate the impact of the energy crisis, eliminate the European Union's dependency on imported Russian gas and provide energy security to Member States.

By implementing the Proposed Development, it would offer increased energy security for Europe which would aid in achieving energy independence in line with the goals of the European commission. The Proposed Development has the potential to produce 158.4 MW of energy which would represent a significant boost of renewable energy to the national grid.

### 4.2.3 Renewable Energy Directive

The Renewable Energy Directive 2009/28/EC (as amended) is the legal framework for the development of renewable energy across all sectors of the EU economy, supporting clean energy cooperation across EU countries. Since the introduction of the Renewable Energy Directive in 2009, it has undergone several revisions since then and these revisions are outlined below. Since its adoption in 2009, the share of renewable energy sources in energy consumption has increased from 12.5% in 2010 to 21.8% in 2021 across the European Union<sup>5</sup>

#### RED I - 2009

Renewable Energy Directive 2009 (RED I - the original RED), adopted in 2009, set binding targets for EU member states to achieve a 20% share of renewable energy in final energy consumption by 2020. It established a framework for national renewable energy action plans, sustainability criteria for biofuels and bioliquids, and a system of guarantees of origin for renewable energy.

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<sup>4</sup> General Secretariat of the Council of the European Union, Outcome of Proceedings: Proposal for a COUNCIL REGULATION laying down a framework to accelerate the deployment of renewable energy (File no. 022/0367(NLE)) (22.12.2022)

<sup>5</sup> [https://energy.ec.europa.eu/topics/renewable-energy/renewable-energy-directive-targets-and-rules/renewable-energy-directive\\_en#:~:text=The%20renewable%20energy%20directive%20is,energy%20cooperation%20across%20EU%20countries.](https://energy.ec.europa.eu/topics/renewable-energy/renewable-energy-directive-targets-and-rules/renewable-energy-directive_en#:~:text=The%20renewable%20energy%20directive%20is,energy%20cooperation%20across%20EU%20countries.)

## RED II - 2012

Renewable Energy Directive 2012 (RED II) was the first major amendment to the RED and was adopted in 2012. It introduced a target for the EU to achieve a 20% share of renewable energy in gross final energy consumption by 2020, expanding the scope beyond just electricity to all energy sectors. It also strengthened sustainability criteria for biofuels and introduced reporting obligations for member states. The Directive 2009/28/EC specifies national renewable energy targets for 2020 for each country, taking into account its starting point and overall potential for renewables.

In RED II, the overall EU target for Renewable Energy Sources consumption by 2030 has been raised to 32%

## RED III - 2018

Renewable Energy Directive 2018 (RED III) was another significant amendment to the RED and was adopted in 2018. It established a new target for the EU to achieve at least a 32% share of renewable energy in gross final energy consumption by 2030. The directive introduced new provisions to promote the use of renewable energy in heating and cooling, transport, and electricity sectors. It also enhanced the sustainability criteria for biofuels and set specific sub-targets for advanced biofuels and renewable transport fuels of non-biological origin. Given the need to speed up the EU clean energy transition, the Directive (2009/28/EC) was revised and entered into force in 2018. It has been legally binding since June 2021.

## Fit for 55 - 2021

In July 2021, the Commission proposed another revision of the directive, raising the target to 40% (up from 32%), as part of the 'Fit for 55' package to deliver on the European Green Deal. Less than a year later, in view of the Russian invasion of Ukraine and the need to further step up our energy independence from fossil fuels, the Commission proposed to further increase this target to 45% by 2030, as part of REPowerEU.

As the targets for the provision of increased renewable energy onto the electricity grid grow, it is clear that the Proposed Development will assist in meeting the targets set out in the Renewable Energy Directive.

## 4.2.4 Progress on Climate and Renewable Energy Targets

This section provides a brief summary of the relevant climate and renewable energy targets for the State, and which form the basis for much of the climate and energy related planning policies and objectives that are set out in the following Sections.

### 4.2.4.1 Climate Targets

#### 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).

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).

In the context of Ireland, and the possible outcomes under various scenarios analysed, 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. Therefore, it is clear that the Proposed Development will assist in achieving these targets.

#### 4.2.4.2 Renewable Energy 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 CO<sub>2</sub> 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 (see Figure 1 below) the summary of sectoral ceilings within the first two carbon budgets, over the periods 2021-2025 and 2026-2030.

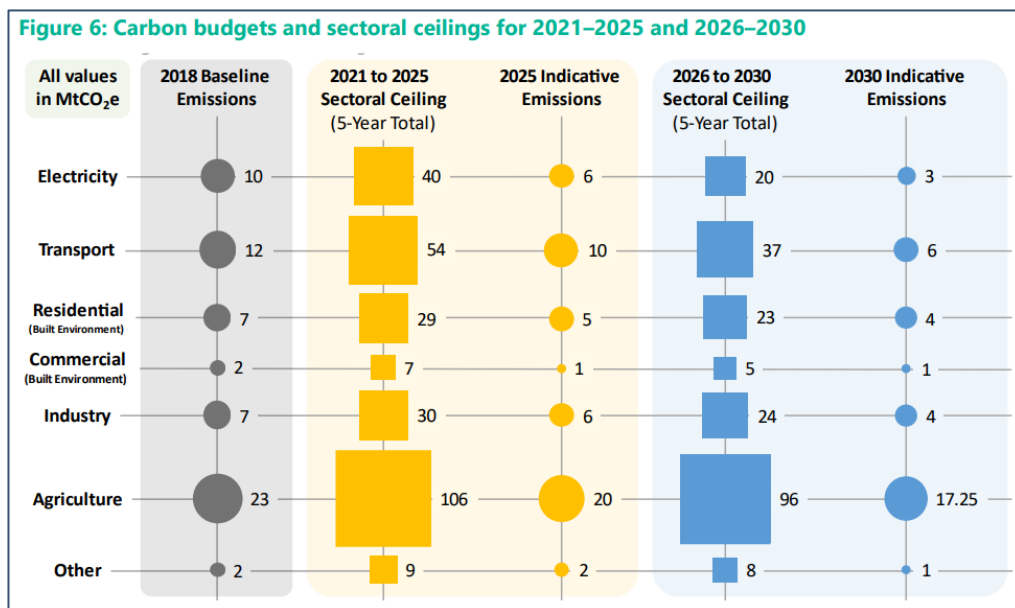


Figure 5. Carbon budgets and sectorial ceilings for 2021-2025 and 2026-2030

The report confirms that wind accounted for 84% of renewable electricity generated in 2021 having 4,339MW of installed wind capacity in 2021. Up to September 2022, the report confirmed 78MW of added wind capacity.

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.

The current RES-E target to 2030 of 80% 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 <sup>6</sup>CAP 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.

## 4.3 National Policy

### 4.3.1 Project Ireland 2040: National Planning Framework

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.

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.

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.

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.

**National Strategic Outcome 8:** Transition to a low carbon and climate resilient economy.

**National Planning Objective 55:** Promote renewable energy use and generation at the appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy 2050.

The provisions of **National Policy Objective 54** should also be noted in this regard which seeks to “reduce our carbon footprint by integrating climate action into the planning system in support of The provisions of National Policy Objective 54 should also be noted in this regard which seeks to “*reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives as well as targets for greenhouse gas emissions reductions*”

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, the ability to diversify and adapt to new energy technologies and the transition to a low carbon and climate resilient economy.

The NPF states the Government will address environmental and climate challenges through the following overarching aims as listed under ‘Resource Efficiency and Transition to a Low Carbon Economy’:

- Sustainable Land Management and Resource Efficiency;
- Low Carbon Economy;

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<sup>6</sup> CAP23 was not yet published when the CCAC 2022 Annual Review was published.

- > Renewable Energy; and
- > Managing Waste.

In relation to National Strategic Outcome 8, the NPF states:

*“New energy systems and transmission grids will be necessary for a more distributed, renewables focused energy generating system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy to the major sources of demand.”*

The NPF acknowledges that: *“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 Proposed Development will generate a large quantity of electricity to contribute to Ireland’s renewable energy generation and carbon saving targets as set out at national level. As a renewable energy proposal, the project will assist in meeting national renewable energy targets and will also result in significant reductions in carbon emissions from electricity generation and reduce the country’s reliance on imported fossil fuels. It is recognised that replacing the use of fossil fuels for electricity generation with electricity generated from zero-carbon renewable energy sources is a key part of Ireland’s strategy to decarbonise the energy system along with securing energy security. For these reasons it is submitted that the Proposed Development will contribute substantially to meeting National Strategic Outcome 8 of the NPF (Transition to a low carbon and climate resilient economy) and NPO 55 (Promote renewable energy use).

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

The Climate Action and Low Carbon Development (Amendment) Act 2021 establishes a legislative precedent to reduce Ireland’s carbon emissions. Building on the aims and objectives set out under the Climate Action and Low Carbon Development Act 2015, the Climate Action and Low Carbon Development (Amendment) Act 2021, which was signed into law on the 23<sup>rd</sup> of 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.

In terms of progress relating to the carbon budgets, UCC MaREI estimates power sector emissions should be 55Mt from 2021-2030. 10Mt were used in 2021 alone leaving just 45Mt for the period 2022-2030.

The Climate Action and Low Carbon Development (Amendment) Act 2021 also outlines the obligations of ABP and/or local authority in assisting the country to reach these targets.

Section 15 of the Act states as follows:

*“Section 15. (1) A relevant body shall, in so far as practicable, perform its functions in a manner consistent with—*

*(a) the most recent approved climate action plan,*

*(b) the most recent approved national long term climate action strategy,*

*(c) the most recent approved national adaptation framework and approved sectoral adaptation plans,*

*(d) the furtherance of the national climate objective, and*

*(e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.”*

The Proposed Development represents a significant opportunity to be a nationally important wind energy generator, contributing to the 51% reduction in emissions being sought by 2030, which is, as outlined above, a legally binding requirement. The Proposed Development is therefore consistent with, and supported by, the legally binding emissions reduction targets set out above.

#### 4.3.3 National Energy Security Framework (April 2022)

The National Energy Security Framework (DECC, April 2022) highlights clearly the impacts the Russian invasion of Ukraine and the resulting war has had on Europe’s energy system. The resulting decision by the European Union to phase out the import of Russian gas, oil and coal (REPowerEU) has brought to the fore the importance of security of supply and how energy policy is designed for long-term resilience.

It takes account of the need to decarbonise society and economy, to reduce Ireland’s emissions by 51% over the decade to 2030 and reach net zero emissions by 2050. According to the SEAI’s Energy in Ireland (2021) report, oil accounts for 45% of Ireland’s primary energy requirement making it one of the highest rates of oil dependency in the EU.

The International Energy Agency, of which Ireland is a member country, includes a 10-point plan to cut oil use which calls for an acceleration in the deployment of wind and solar projects. Ireland’s response per the 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.”*

Response 25 seeks **the alignment of all elements of the planning system to support accelerated renewable energy development.**

#### 4.3.4 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.

The CAP emphasis 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.

As set out in this section the renewable energy targets for the State have increased steadily with each new CAP, with the target of 70% renewable electricity by 2030 set out in CAP19 increasing to 80% in CAP21 and the target of 8GW of onshore wind by 2030 set out in CAP 19/21 increasing to 9GW in CAP23. These increased targets and increased focus on the role of onshore wind highlights how important developments such as the one proposed are vital to achieving our climate action targets.

#### 4.3.5 Wind Energy Guidelines

The 2006 Wind Energy Development Guidelines for Planning Authorities ('the 2006 Guidelines') were issued by the then Department of Environment, Heritage and Local Government (DoEHLG) in June 2006 under Section 28 of the Act of 2000. 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.

The proposed development adheres to the 2006 Guidelines in its design and preparation. In this regard this EIAR considers all relevant potential environmental impacts that could arise (Chapter 5 of the 2006 Guidelines), and the design of the Proposed Development has followed the design principles established in Chapter 6.

The Department of Housing, Planning and Local Government published the Draft Wind Energy Guidelines (referred to as the Draft Guidelines) in December 2019 and they remain in draft at the time of writing.

The Draft Revised Guidelines note that potential impacts of wind energy development proposals on the landscape, including the natural and built environment, must be considered along with the legitimate concerns of local communities. With this in mind, 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 fully complies with the current 2006 Guidelines and has also been designed with the provisions of the provisions of the Draft Guidelines in mind, (for example in relation to 4 times turbine tip height set back distance from third party sensitive receptors).

The submission period for the Draft Revised Guidelines closed in February 2020. Under the consultation it was evident that a number of submissions made appeared to have observations surrounding similar points, these include but are not limited to themes such as noise, visual amenity set back and shadow flicker. With regards to noise, a number of the received submissions noted that the provisions put forward in the Draft Revised Guidelines were unworkable, as such it was considered that should the noise measures be implemented there is the potential for an on-going impact on the development of onshore wind energy in the future. In relation to set back distances there was strong criticism with regards to this distance being measured to the curtilage of a property due to this measurement being ambiguous and difficult to implement. Furthermore questions were raised surrounding the strict measures which have been put in place surrounding shadow flicker, the Draft Revised Guidelines put forward the provision that 'there will be no shadow flicker at any existing nearby dwelling or other relevant existing affected sensitive property'. While the overall provision is possible a number of clarifications were sought to ensure that this provision could be implemented in a reasonable manner.

At time of writing, the Draft Guidelines have not yet been adopted, and the relevant guidelines for the purposes of section 28 of the Act, remain those issued in 2006. Notwithstanding this, however, due to the timelines associated with the planning process for renewable energy projects and the commitment within the Climate Action Plan 2023 to publish new draft guidelines in 2023 and final guidelines 2024, it is possible that the new guidelines are adopted before ABP determines the planning application for the Proposed Development.

Towards this end it is anticipated that the Proposed Development will be capable of adhering to the relevant noise standards (through wind turbine control measures) and shadow flicker standards (there is no shadow flicker to residential dwellings expected) albeit without sight of the final, adopted guidelines the processes by which the Proposed Development will comply with the same cannot be confirmed at this stage. It should be noted that the Proposed Development layout complies with the required setback distance from residential properties (four times the proposed maximum tip height) in the Draft 2019 document.

## 4.4 Regional Policy Context

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) which was adopted in January 2020.

The North and Western region, as per the RSES, boasts abundant carbon-neutral energy resources like wind, especially in North Mayo. This region plays a pivotal role in Ireland's shift to a low-carbon economy, offering substantial growth potential in renewables. The RSES encourages stakeholders, including industry and commercial sectors, to lead the way in promoting new opportunities and advancing renewable energy generation.

The RSES set out a number of 'Growth Ambitions' including 'Natural Ambition' relating to a Low Carbon Future. This ambition states that:



*“It has been identified that more strategic actions are required to prepare the region for what is to come and highlights the need to create a combined long term vision for the future of both energy supply and our ability to use **renewable energy**. To address our energy requirements our RSES emphasises the need for coordination, new thinking, investment and skills to implement change. All considerations need to be cognisant of our natural resources, landscape and heritage (natural, social and cultural).”*

The RSES goes on to note that “*moving away from fossil fuels towards a greener and low carbon society*” is one of multiple requirements needed to ensure the continued success for the region. The promotion of renewable energy is identified as a solution to reducing the region’s carbon footprint.

The RSES supports the provision of renewable energy sources in the region, as set out in the policies listed below:

**RPO 4.16:** *The NWRA shall co-ordinate the identification of potential renewable energy sites of scale in collaboration with Local Authorities and other stakeholders within 3 years of the adoption of the RSES. The identification of such sites (which may extend to include energy storage solutions) will be based on numerous site selection criteria including environmental matters, and potential grid connections.*

**RPO 4.17:** *To position the region to avail of the emerging global market in renewable energy by:*

- *Stimulating the development and deployment of the most advantageous renewable energy systems,*
- *Supporting research and innovation*
- *Encouraging skills development and transferability*
- *Raising awareness and public understanding of renewable energy and encourage market opportunities for the renewable energy industry to promote the development and growth of renewable energy businesses; 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 mentioned earlier, the region has a strong history of recognizing and seizing emerging opportunities linked to transitioning to a decarbonized economy, particularly in renewable energy generation. It's worth noting that the current transmission network in the region primarily operates at 110 kV, with limited higher capacity at 220 kV and 400 kV. Therefore, the RSES supports the expansion of the grid to safely accommodate a wider range of power flows from regional surplus generation and to meet the growing electricity demand in the future.

**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 proposal will contribute to increasing the levels of renewable energy supply in a manner consistent with the sustainable development of the region. The RSES also recognizes that the development of the renewables represents a key growth enabler for the region (Section 4.4 of the RSES refers). The RSES

notes that “energy is needed for economic growth, and access to affordable and reliable energy is an essential development objective. Historically most incremental energy demand has been met through fossil fuels, however in future that energy will have to be low carbon and ultimately zero-carbon. Decarbonisation can and needs to happen and it is an objective of the NPF that Ireland becomes a Low Carbon Economy by 2050”

This will require additional energy to be supplied from indigenous renewable sources which is identified in the RSES as an opportunity for the region. The RSES clearly supports the decarbonising of the energy sector and towards this end the strategy states:

*“The region has a huge potential for growth in renewables, with its diverse and growing environmental goods and services sector, and not least because of the proactivity and drive with which it embraces this agenda. Demonstrating its commitment through the support of test sites, innovative green policies and investing in infrastructure to support a low carbon future. To achieve this, policies must encourage:*

- *Practices to reduce the production of CO2.*
- *Increase in our energy security.*
- *Reduced cost of electrical power for domestic purposes, and regional development of value*
- *adding of primary production.*
- *Increased industry development of modern high-efficiency building materials.*
- *Increased efficiency in the development of renewable energy production.*
- *Improved efficiency of freight and passenger transport systems”.*

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. Accordingly, the development as proposed will contribute substantially to the fulfilment of objectives set out in the RSES.

## 4.5

## Local Planning Policy

The Mayo County Development Plan 2022-2028 (CDP) is the statutory development plan for the County, against which all applications for development are assessed. An appraisal of the Proposed Development against the policies and objectives of the development plan is set out in the following sections.

As the Proposed Development constitutes SID, this planning application is being made directly to ABP under the provisions of Section 37E of the Act.

It is worth noting that Section 37G (2)(c) of the Act sets out how ABP assesses SID projects, which states as follows:

*“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, also states 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.”*

In summary, ABP is required to ‘consider’ the provisions of the development plan and is not strictly bound to follow the provisions therein. As outlined below however, it is considered that the Proposed Development is consistent with the provisions of the Mayo County Development Plan 2022 – 2028 and the Mayo Renewable Energy Strategy.



4.5.1

## Mayo County Development Plan 2022-2028

The Mayo County Development Plan 2022-2028 (CDP) was formally adopted by Local Members during a dedicated meeting on June 29<sup>th</sup>, 2022. As of August 10<sup>th</sup>, 2022, the Plan has been in effect. The CDP plays a pivotal role in shaping the decision-making process for planning applications, providing a comprehensive framework within which such decisions are made.

The CDP maintains strong connections with the previous development plan's key goals and themes. It recognizes climate change as a significant global challenge and emphasizes the ongoing efforts required for Mayo to become a low-carbon and climate-resilient county. Notably, the CDP contains a policy to establish Mayo as a “*centre of excellence for renewable energy research and development*”. Furthermore, the strategic Climate Action and Renewable Energy Chapter of the CDP highlights the importance of addressing climate change and investing in renewable energy generation as part of the county's decarbonization strategy.

The CDP sets out a strategic aim for Climate Action and Renewable Energy:

*“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.”*

Regarding the Proposed Development, the CDP maintains its commitment to the principle that providing a safe, reliable, and secure electricity supply is essential for sustaining economic growth in County Mayo and the wider region.

*“The Council recognises that a safe, secure, sustainable and affordable supply of energy is of central importance to the economic and social wellbeing of County Mayo. Continued development of renewable energy sources in Mayo will help Ireland achieve our national targets. Mayo has an enormous wind resource with the potential to underpin an entire new economy in the county.”*

With regard to wind energy, the CDP acknowledges the county's significant wind resources, which have the potential to support the transition to a low carbon economy.

Table 2 below outlines the relevant policies and objectives within the CDP which support the provision of renewable energy projects in Co. Mayo.

Climate Action	
MCDP 2022-2028 Policies	Project Compliance with Policies
<b>CAP 1</b> - 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), including the Climate Action Plan (2019 and any subsequent versions).	The implementation of the Proposed Development will aid in achieving the European and national objectives for climate change adaptation and mitigation as it will increase the supply of renewable energy onto the grid thereby reducing reliance on fossil fuels. Other provisions of the plan such as flooding have been taken into account and are addressed in detail in the accompanying EIAR.
<b>CAP 4</b> - 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	The provision of the proposed wind farm will increase the supply of renewable energy onto the grid which will limit greenhouse gas emissions. The use of the proposed site for the development is considered to be appropriate and environmentally acceptable. Further details on the suitability of the

Climate Action	
MCDP 2022-2028 Policies	Project Compliance with Policies
	site for the development can be found in the accompanying EIAR.
<b>CAP 6</b> - <i>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</i>	The establishment of the Proposed Development will increase the penetration of renewable energy into the grid, thereby curbing greenhouse gas emissions and contributing to the transition to a low carbon, climate-resilient and environmentally sustainable economy.
<b>CAP 9</b> - <i>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</i>	The Proposed Development will contribute significantly to Ireland's renewable energy targets outlined in national targets and is considered an appropriately design development in a suitable location as demonstrated throughout the EIAR and summarised throughout this Planning Report.

Table 2. Relevant Climate Action Policies the Mayo CDP

Renewable Energy	
Policies	Project Compliance with Policies
<b>REP 1</b> - <i>To support Ireland's renewable energy commitments outlined in national policy by facilitating the development and exploitation of a range of renewable energy sources at suitable locations within the county, where such development does not have a negative impact on the surrounding environment (including water quality), landscape, biodiversity or local amenities to ensure the long-term sustainable growth of the county</i>	The Proposed Development is in line with the aims and objectives to support commitments outlined in national policy for the provision of renewable energy projects at appropriate locations. The subject site is considered to be suitable for the provision of a wind farm as outlined herein and in the accompanying EIAR. It is not anticipated that the Proposed Development will have any significant adverse effects on the receiving environment where the proposed development is located.
<b>REP 3</b> - <i>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.</i>	The provision of the Proposed Development will aid in increasing the security of energy supply through the provision of an indigenous renewable energy generating asset. The surrounding landscape of the Proposed Development will also be protected as outlined in the accompanying EIAR.
<b>REP 6</b> - <i>To work with relevant stakeholders and industry to establish Mayo as a centre of excellence for renewable energy research and development activities.</i>	The Proposed Development represents an opportunity for the provision of a wind farm producing an anticipated 154.8 MW of power. This coupled with north County Mayo's existing portfolio of renewable energy projects (as outlined in Table 1), will aid in achieving Mayo County Council's aim of being a "Centre of Excellence for Renewable Energy Research and Development Activities"
<b>REP 7</b> - <i>To promote the harnessing of wind energy to contribute toward decarbonising County Mayo, including new emerging by-product markets.</i>	The provision of the Proposed Development will result in the production of an anticipated 154.8 MW of energy which will be transferred onto the national grid. This will increase the share of renewable energy on the grid thereby decreasing the demand for fossil fuel generated energy. Therefore, this will contribute to decarbonising the economy.

Table 3. Relevant Renewable Energy Policies of the Mayo CDP

Table 4 below outlines the other policies of the Mayo CDP which are also relevant to the Proposed Development.

Other Relevant Policies	
Policies	Project Compliance with Policies
<b>INP 14:</b> <i>To have regard to the Guidelines for Planning Authorities on the Planning System and Flood Risk Management (DoEHLG/OPW 2009) and Circular PL2/2014 (or as updated), in the preparation of plans and strategies related to development and in the assessment of projects.</i>	Detailed hydrology and hydrogeology assessments have been carried out on the proposed scheme and are included in chapter 9 of the accompanying EIAR.
<b>INP 16:</b> <i>To support the implementation of recommendations in the CFRAM Programme to ensure that flood risk management policies and infrastructure are progressively implemented.</i>	The site drainage design is in line with the relevant policies of the CFRAM Programme to ensure the appropriate measures were taken in the drainage design of the proposed scheme.
<b>INP 21:</b> <i>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 biodiversity, wildlife habitats, scenic amenities, including protected views and nature conservation.</i>	The provision of the grid connection from the Proposed Development will be subject to a separate planning application. However, the renewable energy produced from the Proposed Development (if permitted) will be connected to the grid via a fully assessed grid connection route.
<b>BEP 1:</b> <i>To support and promote the protection, appropriate management and sympathetic enhancement of the county's archaeological heritage within the Plan area, in particular by implementing the Planning and Development Act 2000 (as amended) and the National Monuments Act 1930 (as amended).</i>	The Proposed Development has taken into consideration the cultural and archaeological heritage of its surrounding environment. Chapter 12 of the accompanying EIAR outlines how the appropriate mitigation approaches have been taken in this regard.
<b>NEP 1:</b> <i>To support the protection, conservation and enhancement of the natural heritage and biodiversity of County Mayo, including the protection of the integrity of European sites, that form part of the Natura 2000 network, the protection of Natural Heritage Areas, proposed Natural Heritage Areas Ramsar Sites, Nature Reserves and Wild Fowl Sanctuaries (and other designated sites including any future designations).</i>	The Proposed Development has been informed by several design buffers set out in order to protect the biodiversity of the site. This design process has taken into account several buffers in relation to Natura 2000 sites, watercourses etc. These are outlined in greater detail in Chapter 6 of the accompanying EIAR.
<b>NEP 9:</b> <i>To enhance the county's natural heritage and biodiversity through supporting the protection and restoration of peatlands in County Mayo, where appropriate, in order to transition towards a low-carbon and circular economy.</i>	A Geotechnical and Peat stability report has been carried out for the proposed site. This has informed Chapter 8 of the accompanying EIAR.
<b>NEP 14:</b> <i>To protect, enhance and contribute to the physical, visual and scenic character of County Mayo and to preserve its unique landscape character.</i>	A complete Landscape and Visual Impact Assessment has been completed on the Proposed Development which informs Chapter 13 of the accompanying EIAR.
<b>NEP 19:</b> <i>To protect existing groundwater sources and aquifers in the county and to manage</i>	The Proposed Development site has been subject to the appropriate hydrological and hydrogeological surveys and

Other Relevant Policies	
Policies	Project Compliance with Policies
<i>development in a manner consistent with the protection of these resources</i>	assessment. These surveys and assessments are set out in Chapter 9 of the accompanying EIAR.
<i>NEP 25: To promote the implementation of the Noise Directive 2002/49/EC and associated Environmental Noise Regulations 2006, as amended.</i>	The appropriate noise monitoring has taken place at the Proposed Development site. This data has been used to inform Chapter 11 of the EIAR accompanying this application.

Table 4. Other Relevant Policies of the Mayo CDP

As demonstrated in this section, the Proposed Development is consistent with, and supported by, the relevant policies and objectives of the Mayo CDP.

## 4.5.2 Environmental Conclusions

The EIAR which accompanies this application has cumulatively assessed the likely environmental and ecological impacts of the Proposed Development in combination with other permitted, proposed and existing developments in the vicinity of the Proposed Development. A summary of the conclusions reached within the relevant EIAR chapters are outlined below.

### 4.5.2.1 Population and Human Health

#### Health and Safety

The EIAR concluded on the following in relation to health and safety:

*“The proposed wind farm will have no cumulative impacts in terms of health and safety. There is no credible scientific evidence to link wind turbines with adverse health impacts.”*

#### Employment and Economic Activity

The EIAR concluded on the following in relation to employment and economic activity:

*“The permitted projects along with the Proposed Development will contribute to short term employment during construction stages. All wind farms including the Proposed Development, will provide the potential for long-term employment resulting from maintenance operations. This results in a long-term, moderate positive impact.”*

#### Property Values

The EIAR concluded on the following in relation to employment and property values:

*“As noted in Section 5.7 above (of the EIAR), the conclusions from available international literature indicate that property values are not impacted by the positioning of wind farms near houses. It is on this basis that it can be concluded that there would be a long-term imperceptible cumulative impact from the Proposed Development and other wind farm developments in the area.”*

#### Shadow Flicker

The EIAR concluded on the following in relation to employment and shadow flicker:

*“As outlined in the Section 5.8.7 above (of the EIAR), there is no potential for cumulative shadow flicker to be experienced at the property assessed.”*

#### 4.5.2.2 Biodiversity

The EIAR concluded on the following in relation to biodiversity:

The implementation of the Biodiversity Management and Enhancement Plan, outlined in appendix 6-5, aims to restore around 41 hectares of peatland habitat by removing conifers and blocking drains. This will significantly enhance the quality and quantity of peatland habitats within the EIAR boundary, while also connecting with the Glenamoy Bog Complex SAC. The EIAR concluded on the following in relation to biodiversity:

*“The mitigation described in chapter will be implemented in full and it is therefore predicted that there will be no significant individual or cumulative effects on any KERs.”*

#### 4.5.2.3 Ornithology

The EIAR concluded on the following in relation to impacts on birds:

*“With the avoidance measures (design phase), and full implementation of mitigation measures throughout the construction phase, operational phase, and decommissioning phase of the project, significant residual effects on birds are not expected.”*

#### 4.5.2.4 Land Soils and Geology

The EIAR concluded on the following in relation to impacts on land, soils and geology:

*“Due to the localised nature of the proposed construction works which will be kept within the Proposed Development site boundary, there is no potential for significant cumulative effects in-combination with other local developments on the land, soils and geology environment as all effects are direct within the Proposed Development site.”*

#### 4.5.2.5 Hydrology and Hydrogeology

The EIAR concluded on the following in relation to impacts on hydrology and hydrogeology:

*“With the implementation of mitigation measures and best practice methods on the part of both the Proposed Development and forestry operators, risks of effects are reduced and potential cumulative effects can be monitored, managed and mitigated. As such, the likely significant residual cumulative effects are considered both direct and indirect, negative, not significant, long-term, and unlikely.”*

#### 4.5.2.6 Air Quality

The EIAR concluded on the following in relation to impacts on air quality:

*“The nature of the Proposed Development and other wind energy developments within 20 kilometres are such that, once operational, they will have a cumulative long-term, significant, positive effect on the air quality.”*

#### 4.5.2.7 Climate

The EIAR concluded on the following in relation to impacts on climate:

*“The nature of the Proposed Development is such that, once operational, it will have a long-term, moderate, positive impact on climate.”*

#### 4.5.2.8 Noise

The EIAR concluded on the following in relation to impacts on noise:

*“The guidance contained within the WEDG 2006 was used to assess the likely operational noise impact of the Proposed Development. Predicted wind turbine noise levels and measured background noise levels show that for the nearby NSRs (ie. residential properties) wind turbine noise would meet the noise criteria established in accordance with the WEDG 2006. Therefore, the operational noise effect is not significant.”*

#### 4.5.2.9 Archaeology and Cultural Heritage

The EIAR concluded on the following in relation to impacts on archaeology and cultural heritage:

*“There will be no significant potential impacts on the archaeological, architectural and cultural heritage environment during the decommissioning of the proposed development. Any potential direct impacts will already have been resolved through mitigation measures during the construction phase.”*

#### 4.5.2.10 Landscape and Visual Impact

The EIAR concluded on the following in relation to impacts on landscape and visual impact:

*“In conclusion, the Proposed Development is an appropriately designed and suitably scaled project, and likely landscape and visual effects are deemed to not be Significant.”*

### 4.5.3 Mayo Renewable Energy Strategy 2011 - 2020 (RES)

#### 4.5.3.1 Introduction

The Mayo Renewable Energy Strategy (RES) was published in 2011 and forms part of in the Mayo County Development Plan 2022 - 2028. The RES has been developed as a planning framework to support the implementation of renewable energy in the county. The 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 CDP, however, Objective REO 7 indicates that the review of the RES will commence within one year of adaptation of the new CDP.

*“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.”*

There has been no update published on the RES at the time of writing this report.

#### 4.5.3.2 Renewable Energy Strategy – Vision for Mayo

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.”*

#### 4.5.3.3 Areas Designated for Wind Energy Development

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 onshore 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.

Section 6.4 of the RES states the following in relation to how renewable energy applications will be examined:

*“The Council will consider all proposed renewable energy developments submitted through the planning system through the pre-planning process. The proposals will be examined and assessed using the GIS system developed by Mayo County Council outlined in Section 5 of this Strategy. The areas identified in this document and on the Maps accompanying this Strategy are considered the most appropriate for renewable energy developments. Other areas are likely to have planning and environmental constraints which would make them less suitable for renewable energy developments. In compliance with the Habitats Directive and the fact that there are alternative sites available for renewable energy development in the County, no renewable energy development will be considered on Natura 2000 sites.”*

With regard to the land classifications it must be acknowledged that a portion of the site has the highest favourable zoning (Tier 1) for wind energy development with another portion zoned Tier 2. As strategically zoned lands, it is vital that these areas are developed for wind energy to their full potential in order to meet national, regional and local renewable energy targets. It is important to note that not all Tier 1 & Tier 2 zoned lands will be feasible for wind energy development due to various project-specific constraints. It is, therefore, imperative that all viable sites are considered favourably for wind energy development in order to make the most efficient use of a viable, strategically designated and otherwise suitable site.

The GIS mapping carried out by Mayo County Council informed the design of the Proposed Development. Various planning and environmental constraints were applied to the GIS mapping set out in the RES to determine areas suitable for wind energy developments. These are included in Appendix 1 of this Report. The RES states the following in relation to these constraints:

*“These areas were then excluded as potential areas suitable for wind energy development (Map 1 Wind Energy) with the exception of sensitive landscapes, scenic views, routes or viewing points and recorded monuments where it was felt that these would require further assessment and could possibly be mitigated against on a case by case basis.*

*It was decided that due to the nature and scale of other renewable energy developments, development proposal **would have to be considered on a case by case basis**. Consideration of such proposals and renewable energy infrastructure will be subject to an assessment using the planning and environmental constraints used for Map 1 Wind Energy which shall be continuously updated, and added to as relevant data becomes available.” (emphasis added)*

Following a review of the constraints applied in the RES it is unclear as to why there is a different designation to the Tier 1 and Tier 2 areas within the subject application site. As outlined in Figure 4, project level constraints were applied to the site, and this left a “remaining viable area”. Hence, it is submitted that the location of the turbines is suitable for wind energy development, and as such, this area should be regarded as favourably designated for wind energy development. The siting of the turbines is deemed appropriate and is not expected to result in adverse environmental effects.

The mitigation measures (outlined in section 4.5.2.4) have been complied with in the design and layout of the Proposed Development. Compliance with these mitigation measures ensures that the Proposed Development is in line with the principles of proper planning and sustainable development and therefore will be assessed on its merits by the Planning Authority.

Section 6.5 of the RES provides guidance on how applications for renewable energy developments are assessed in the County:

*“Notwithstanding the potential areas identified in this Strategy **all proposed renewable developments will be assessed on the principles of proper planning and sustainable development**, ensuring minimal adverse environmental impact, including flooding, and taking full account of the presence and requirement to protect all Natura 2000 sites and (proposed) Natural Heritage Sites. Projects will be subject to Habitats Directive Assessment where considered appropriate.” (emphasis added)*

The RES also states that all applications for renewable energy developments must demonstrate that the Proposed Development is in compliance with the requirements set out in the mitigation measures of the RES (addressed in the following sections) and the policies and objectives of the CDP (addressed in section 4.5.2.4).

*"Applicants/developers applying for planning permission for renewable energy developments will be required to demonstrate that any proposed renewable energy developments comply with the requirements set out in the mitigation measures below, along with requirements set out in the Mayo County Development Plan 2008-2014 or relevant Local Area Plan (or subsequent plans) and any national guidelines in relation to the location of renewable energy developments."*

It should also be noted that the RES does not specifically restrict applications for wind turbines within the unclassified areas, but rather, they are assessed on their merits ‘on the principles of proper planning and sustainable development’.

Figure 2 below presents the Proposed Development site with the RES classifications overlaid with the Proposed Developments layout. As demonstrated on this map, 3 no. proposed turbines fall within the classification areas *Tier 1 – Large Windfarm*, with 4 no. located in *Tier 2 - Open to Consideration* as set out in the RES for County Mayo. The remaining 15 turbines are within an area that does not fall under any classification in the RES (i.e. ‘unclassified’).

The layout of the Proposed Development with the RES land classifications can be seen in figure 2 below:



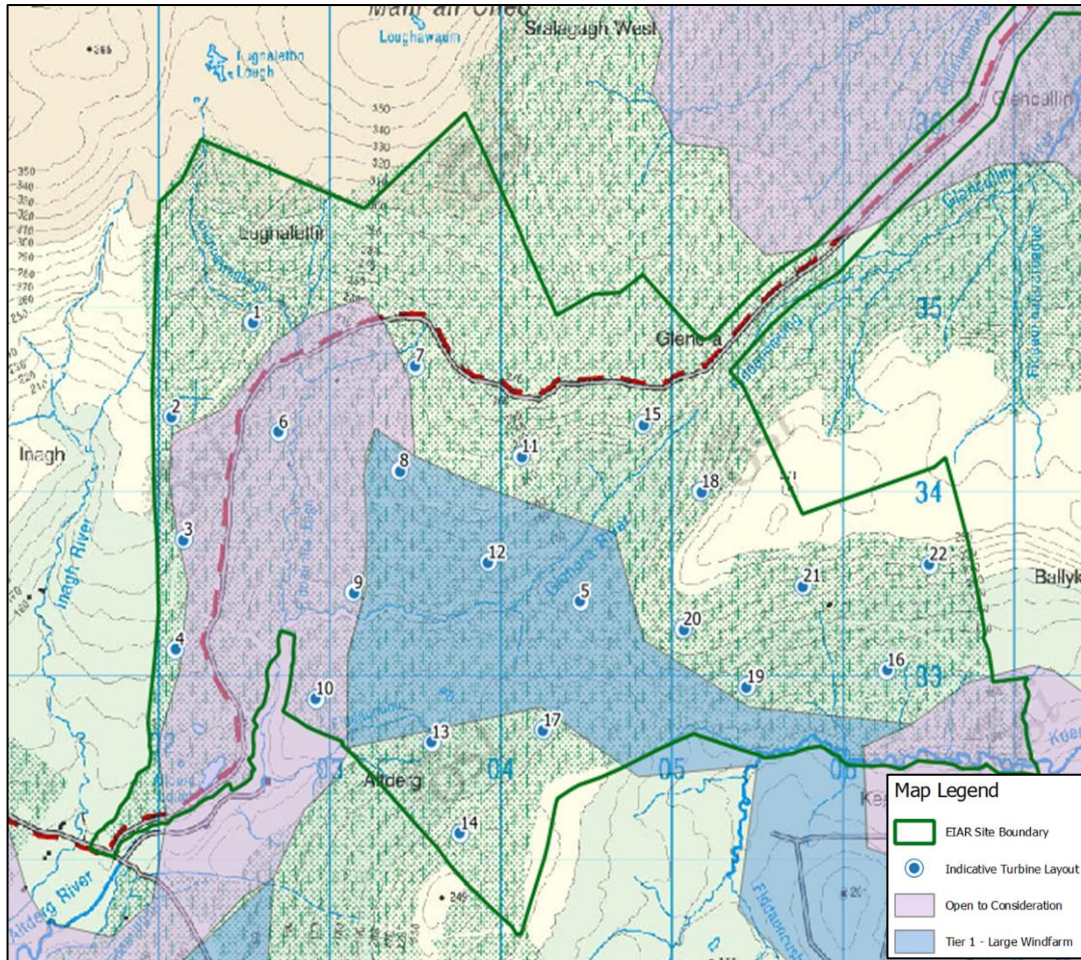


Figure 6. Site Layout with RES Land Designation Overlay

As is evident from Figure 2 above and table 6 below, many of the turbines in the unclassified lands are located very close to the boundary of either Tier 1 or Tier 2 lands, with 8 no. being less than 250m away. The distance of each turbine from the lands designated as preferable for wind energy development is outlined in Table 6 below:

Turbine Number	Distance From Tier 1/ Tier 2 Area	Turbine Number	Distance From Tier 1/ Tier 2 Area
1	166m	12	0m
2	86m	13	65m
3	0m	14	582m
4	36m	15	612m
5	0m	16	276m
6	0m	17	101m
7	61m	18	555m
8	0m	19	87m
9	0m	20	169m
10	0m	21	684m
11	226m	22	678m

Table 5. Distances of Turbines from Mayo RES Classified Areas

#### 4.5.3.4 Compliance with RES Mitigation Measures

As described herein, it is asserted that the areas where the turbines are proposed are suitable for wind energy development, despite the "unclassified" designation in the RES. After conducting a detailed assessment of project-specific constraints, the turbines have been strategically located within the remaining viable area of the site. The favourable designation that applies to a portion of the Proposed Development site should be extended to the entire area where the turbines are proposed. This is because the areas designated for the wind energy development share similar landcover and landscape characteristics and it is not clear why the unclassified lands in the subject site were designated differently to the Tier 1 and Tier 2 lands. Therefore, it is submitted in these circumstances that the areas intended for turbine placement be considered as favourable for wind energy as Tier 1 / Tier 2. Achieving targets, both at the national and local levels, is of utmost significance, necessitating the development of all suitable sites, with particular attention to those identified as Tier 1 & Tier 2. It is important to acknowledge that not all Tier 1 lands will be feasible for development due to project-specific constraints, as outlined in Section 3.3. This demonstrates the significance of evaluating this site favourably and in the context of broader designation considerations.

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 (mitigation measures) 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 the Proposed Development as outlined in Section 6.5 of the RES and is therefore consistent with the RES in terms of the principle of development. Further detailed analysis is provided in the relevant EIAR chapters.

Mayo Renewable Energy Strategy Mitigation Measures	
Mitigation Measures	Compliance
<i>“Wind farm developments (including small clusters of single turbine developments) will only be considered within 500m of the aforementioned locations (occupied dwellings) 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”</i>	A significant minimum separation distance of c. 720m 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.
<i>“Landslide susceptibility and slope stability risk assessments shall be carried out by a suitably qualified person(s) in conjunction with the Geological Society Ireland”.</i>	The Geotechnical & Peat Stability Assessment Report, included as Appendix 8-1 of this EIAR and has been carried out by suitably qualified person(s). The report concludes that the proposed Glenora 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.
<i>“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.”</i>	The proposed drainage measures and controls for the wind farm site, refer to Sections 4.7 of the EIAR and Section 4.3.4.2 of the NIS, will ensure that the Proposed Development will not have a negative impact on water quality, aquatic habitats or species during installation, operation and maintenance of the Proposed Development.
<i>“Proposals for renewable energy development shall be required to demonstrate that connection to the national grid can be carried out in a sustainable manner.”</i>	The proposed grid connection will be subject to a separate planning application however it has been assessed within this application in the accompanying EIAR as it is functionally interdependent with the proposed wind turbine infrastructure. No significant effects are predicted from the construction, operation or decommissioning of the grid connection.
<i>Renewable energy developments shall be sited and designed to minimise the impact to visual amenity of the surrounding area;</i>	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 habitable 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. 700m from the nearest residential property, which exceeds the setback requirement by c. 200m Refer to Section 13.7.3.3.3. of the EIAR for further details.

Table 6. Compliance with RES Mitigation Measures

Table 7 above demonstrates that the Proposed Development is in line with the mitigation criteria set out in the RES. The planning application has demonstrated that the Proposed Development 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 Development without significant adverse effects.

Having regard to the above, it is submitted that the Proposed Development is consistent with the RES and that the Proposed Development is in accordance with the principles of proper planning and sustainable development.

Furthermore based on Climate Action Plan assumptions, onshore wind will provide most of the required electricity yield to meet 2030 targets (9GW). Taking account of this, local authorities need to be cautious when considering the designation of areas for renewable energy development, so as not to constrain any land with renewable energy potential. Excluding areas for renewable energy developments should only take place where there is a supporting statement from an appropriate source of expertise and a scientific basis for doing so. Potential impacts on landscape, ecology and residential amenity can generally be identified and mitigated through detailed surveys, construction management plans and techniques, pollution control measures, monitoring and post construction reinstatement all of which have been considered for the Proposed Development.

#### 4.5.3.1 Landscape Considerations

In terms of visual impact, it is considered that there is immaterial, if not, little difference between the areas designated as “Open for Consideration” and the “Unclassified” areas within the Proposed Development site. Throughout the iterative design process, various ZTVs (Zone of Theoretical Visibility) were generated to evaluate different turbine layout designs. These designs varied in terms of the number of turbines, their dimensions, and their locations. The main objective was to minimize the visibility of the Proposed Development from sensitive viewing points in the west and north. Multiple ZTVs were created to assess the visibility of turbines with tip heights of 180m, 200m, and 220m.

Through this iterative design process, all proposed turbines were strategically positioned below a base elevation of 240m above ordnance datum (AOD). This ensured that the turbines would be effectively shielded by the elevated landform surrounding them to the north and west, specifically Slieve Fyagh. As a result, the visibility of the turbines from extensive areas in the northern and western sections of the LVIA Study Area would be limited. Furthermore, it is submitted that the area where the proposed turbines are sited including Tier 1, Tier 2 and unclassified lands is of low landscape value and sensitivity as emphasised in Chapter 13 of the accompanying EIAR. Furthermore, it is reiterated that the area where the turbines are proposed (including Tier 1, Open for Consideration and Unclassified lands) should all be considered as favourable for wind energy development as a result of their identical landcover and physical characteristics. The renewable energy targets set out at national and local level are often based on the quantum of zoned land available for development Hence, meeting the targets, both on a national and local scale, is contingent on the development of all appropriate sites, with special attention to those designated as Tier 1. As mentioned previously, it is crucial to acknowledge that not all Tier 1 lands may be viable for development due to specific project constraints. This highlights the importance of assessing this site favourably while taking into account the larger zoning context.

The assessment of the Proposed Development Site's landscape value and sensitivity, as discussed in Section 14.4.2 of the accompanying EIAR, concluded that it falls within the 'Low' category. When this low sensitivity is weighed against a significant degree of change, it results in long-term landscape effects that are considered 'Moderate' in terms of their significance on the physical landscape of the site (Refer to LVIA Methodology in Appendix 14-1). These direct landscape effects will be primarily confined to the specific area where the proposed turbine infrastructure. Furthermore, the impact on the visual and aesthetic character of the Proposed Development Site is also evaluated as having 'Moderate' significance.

Please refer to Chapter 13 of the EIAR which provides a comprehensive assessment of the Proposed Development in terms of visual impact.



4.6

## Policy Timeline



Figure 7 Policy Timeline of documents published since the Mayo RES 2011

The Mayo Wind Energy Strategy was initially adopted in 2011 and has remained unchanged in the Mayo County Development Plan 2022-2028 although there is an objective in the CDP to review the RES within one year of adopting the CDP. However, as demonstrated herein, there has been significant policy development and increased targets in relation to climate and energy since the initial adoption of the RES in 2011.

It is clear that the Mayo Wind Energy Strategy requires updating with the increasingly ambitious targets that have been set out and revised upwards since the introduction of Project Ireland 2040 in 2018, the first Climate Action Plan in 2019, and subsequent iterations up to 2023, the National Energy Security Framework and REPowerEU.

From a European perspective, policies such as the Fit for 55 Package in 2021 and the REPowerEU Plan in 2022 have raised the renewable energy targets from 40% to 45% of energy generated from renewable sources. Figure 3 above highlights the plans and policies which have been adopted subsequent to the Mayo RES. It should be noted that we are not proposing that the Mayo Renewable Energy Strategy be disregarded, however given the increasing targets for the provision of renewable energy developments and reducing carbon emissions at all levels of policy, it is considered that some of the aims and objectives are now outdated and will be increased in the updated iteration of the RES, and the RES should be seen in this context.

Table 8 below provides a breakdown of how the policy landscape has altered since the introduction of the RES. It is clear that emissions reduction and renewable energy targets have increased since the adoption of the RES in 2011. It is therefore considered that the updated version of the RES is likely to include further increases in the targets for the production of renewable energy and may designate more areas of land as being suitable for the provision of renewable energy developments.

Policy Document / Instrument	Year	Relevant Target
Mayo Renewable Energy Strategy	2011	16% renewable energy consumption by 2020
Project Ireland 2040: National Planning Framework	2018	80% reduction in GHG emissions in energy sector by 2050
Project Ireland 2040: National Development Plan	2018	8 GW of onshore wind by 2030
Climate Action Plan 2019	2019	70% renewable energy electricity by 2030, including 8.2GW of onshore wind.
Regional Spatial and Economic Strategy for the Southern Region	2020	70% renewable energy electricity by 2030, including 8.2GW of onshore wind.
Climate Action and Low Carbon Development (Amendment) Act 2021	2021	51% reduction in GHG emissions by 2030 & climate neutrality by 2050
Climate Action Plan 2021	2021	80% renewable energy electricity by 2030 including 8GW of onshore wind
Renewable Energy Directive (revision)	2021	32% Renewable Energy by 2030 (EU wide)
Renewable Energy Directive (revision) ('EU Fit for 55')	2021	40 % Renewable energy by 2030 55% reduction in GHG emissions by 2050 (EU Wide)
Mayo County Development plan 2022-2028	2022	600MW wind energy by 2028 for the County
Climate Action Plan 2023	2023	80% renewable energy electricity by 2030 including 9GW of onshore wind
RePowerEU	2022	45% renewable energy by 2030 (EU wide)
National Energy Security Framework	2022	51% reduction in GHG emissions by 2030 & climate neutrality by 2050
Renewable Energy Directive (revision)	2023	42.5% renewable energy by 2030 (EU wide)

Table 7: Renewable Energy Related Policies Issued Since the Adoption of the Mayo RES

#### 4.7

## Planning Policy Conclusion

The Renewable Energy Strategy (RES) for County Mayo 2011-2020 (2011) provides guidance to Mayo County Council in order to fulfil national legally binding targets and maximise the benefits of renewable energy generation and utilization in a sustainable manner. Although the RES was not revised during the drafting of the Mayo County Development Plan 2022-2028 (CDP), Objective REO 7 states that the review of the RES will begin within one year of adopting the new CDP, although that has yet to take place. There is an objective of the CDP to achieve a minimum renewable energy target of 600MW for County Mayo over the lifetime of the CDP.

The vision of the RES for Mayo's renewable development strategy is based on the fundamental principle that the utilization of renewable energy sources should be carried out in a sustainable manner. This approach aims to safeguard the County's natural resources and preserve the local economies that rely on them, such as tourism.

Having regard to the above approach to considering wind farm developments in the County, and the policies and objectives set out in the previous section, it is clear that there is no specific policy or objective restricting the provision of wind turbines in unclassified areas, subject to complying with the principles of proper planning and sustainable development.

It is noted that the Climate Action and Low Carbon Development Acts 2015 (as amended) ('the Climate Act') requires the Board, as a relevant body, to "*in so far as practicable, to perform its functions in a manner consistent with, inter alia, the national climate objective*". In this regard, at a national level, Ireland's latest Climate Action Plan includes specific targets for onshore wind of 9GW installed capacity by 2030. Ireland is significantly off track to meet these targets as well as its greenhouse gas emissions reduction targets. The Mayo Renewable Energy Strategy has not been updated on foot of either the

Climate Act or the Climate Action Plan (which was first published in 2019 and updated in both 2021 and 2023). The update of the RES is scheduled as part of the new CDP. Thus the current RES is not a planned system for renewables, as it has not been made with due cognisance of the most recent national plan and targets.

Notwithstanding the above, and as set out in the previous sections, there is strong policy support for the Proposed Development at all levels of planning policy and at a local level, the Proposed Development is consistent with the provisions of both the Development Plan and the RES.

## 5. CONCLUSION

The provision of wind energy developments such as the one proposed is strongly supported by International, National, Regional and Local policies and guidelines aimed at achieving the transition to a low carbon and climate resilient economy, increasing renewable energy generation, and enhancing energy security. Specifically, the Proposed Development will contribute to achieving the target of generating 9GW of electricity from onshore wind and reducing GHG emissions by 80% by 2030 as set out in the CAP23.

The project aligns with National Strategic Outcomes and Objectives outlined in the National Planning Framework, particularly Objective 55, which seeks 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.

In addition, the project is supported by Regional Policy Objectives set out in the RSES, including RPO 4.17 Availing of the Global Renewable Energy Market and RPO 4.18 Supporting the Development of Secure Renewable Energy Developments.

It is re-iterated for clarity that the Proposed Development is consistent with the Mayo CPD and the Mayo RES. As outlined herein, it is submitted that the areas where the turbines are proposed are suitable for wind energy development despite the “unclassified” zoning in the RES as the Proposed Development is in compliance with the mitigation measures outlined in the RES and the entire site (including the unclassified land) shares the same landcover characteristics and sensitivity as the Tier 1 and Tier 2 areas within the site. Furthermore, many of the turbines in the unclassified lands are located very close to the boundary of either Tier 1 or Tier 2 lands, with 8 no. being less than 250m away.

It should also be noted that the RES does not specifically restrict applications for wind turbines within the unclassified areas, but rather, they are assessed on their merits ‘on the principles of proper planning and sustainable development’.

Furthermore, it should also be noted that the Mayo RES was adopted prior to the National Planning Framework (2018), the National Development Plan (2018), the State's first three Climate Action Plans (2019, 2021 & 2023), REPowerEU (2022) and the National Energy Security Framework (2022), amongst others. Therefore, it is clear that since the adoption of the RES, there has been an increased push for the accelerated provision of renewable energy developments.

Given recent events in Ukraine, there is now a strategic urgency to diversify away from imported fossil fuels and ensure a secure supply of indigenous energy. The project will contribute to both the State's and Europe's strategic goal of reducing energy dependence to avoid supply disruption and price shocks, especially given the ongoing war in Ukraine. The provision of an indigenous renewable energy asset such as this will enhance energy security, reduce the State's dependence on imported fossil fuels, and reduce the potential for supply disruption, in line with the aims and objectives of the REPowerEU and the National Energy Security Framework.

The design and layout of the project adheres to the recommendations and guidance outlined in the 2006 Wind Energy Guidelines, and the ‘Best Practice Guidelines for the Irish Wind Energy Industry’ (Irish Wind Energy Association, 2012) and is capable of adhering to the ‘Draft Revised Wind Energy Development Guidelines - December 2019, if adopted.

The Proposed Development will contribute to achieving the objectives of the REPowerEU plan, both in relation to the transition to clean renewable energy and energy security for the both the State and the European Union.



Having regard to the key points set out in this Report, it is respectfully requested that ABP consider the relevant international, national and regional planning context that applies to the Proposed Development, and grants permission for the Proposed Development.



## APPENDIX 1

*PLANNING AND ENVIRONMENTAL  
CONSTRAINTS IN MAYO  
RESNEWABLE ENERGY STRATEGY*

<b>Planning and Environmental Constraints</b>	<b>Buffer</b>
Freshwater Pearl Mussel Catchments	0m
Designated Salmonid Rivers	50m
Public and Group Water sources	100m
Special Areas of Conservation	0m
Natural Heritage Areas	0m
Special Protection Areas	0m
Ballycroy National Park	0m
Local Biodiversity Areas	0m
Tree Preservation Orders	0m
Irish Geological Heritage sites	100m
Landslides	100m
Listed Buildings	100m
Recorded Monuments	50m
Walkway and Cycle Routes	100m
Vulnerable Routes & Ridges & Scenic Views (MCDP)	50m
Geodirectory (Residential)	500m
Consented planning permissions	0m
Existing Wind Farms	0m