Response to Section 131 Request

Croagh Wind Farm, Co. Leitrim & Co. Sligo (Ref: ABP-321867-25 & ABP-321866-25)

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Table of Contents

Executive Summary 3

1. CROAGH WIND FARM REMITTAL RESPONSE 5
   - 1.1 Introduction 5
   - 1.2 Planning History 7
2. LEGISLATIVE CONTEXT 10
   - 2.1 Climate and Renewable Energy Legislation 10
     - 2.1.1 European Legislation 10
     - 2.1.2 National Legislation 10
       - 2.1.2.1 Climate Action and Low Carbon Development Act 2015 (as amended) 10
3. NATIONAL AND REGIONAL POLICY 13
   - 3.1 Project Ireland 2040: National Planning Framework 13
   - 3.2 Climate Action Plan 2025 13
   - 3.3 National Energy Security Framework 14
   - 3.4 Regional Planning Policy 15
4. LOCAL PLANNING POLICY 17
   - 4.1 Leitrim County Development Plan 2023-2029 17
   - 4.2 Sligo County Development Plan 2024-2030 21
   - 4.3 Principle of Development 22
5. PREVIOUSLY SUBMITTED ENVIRONMENTAL IMPACT ASSESSMENT AND APPROPRIATE ASSESSMENT 23
6. PREVIOUS INSPECTOR'S REPORTS 25
   - 6.1 Landslide Susceptibility 25
   - 6.2 Impact on Natura Sites 26
   - 6.3 Impact on Bird Species 26
   - 6.4 Visual Impact 27
   - 6.5 Noise Impacts 27
7. CONCLUSION 28

TABLE OF TABLES

Table 1 Carbon Budgets of the Climate Change Advisory Council 11

TABLE OF FIGURES

Figure 1 Proposed Turbine Layout and Project Site Boundary 5

Figure 2 Location of Proposed Development in "Available Area" of "Low Risk" with "Viable Wind Speed >7.6m/s" in LRES (Source: modified from Figs. 6.3 and 6.4 of Leitrim County Renewable Energy Strategy) ..... **Error! Bookmark not defined.**

Figure 3 Location of Proposed Development in "Available Area" in LRES (Source: Figure 6.3 of Leitrim County Renewable Energy Strategy) 20

APPENDICES

Appendix 1: Leitrim CDP 2023-2029 Statement of Consistency
Appendix 2: Sligo CDP 2024-2030 Statement of Consistency
Appendix 3: LVIAR 2026
Appendix 4: Geo-Technical S131 Response 2026

Appendix 4b: Peat Stability Risk Assessment Technical Note 2026
Appendix 5: Ecological Report 2026
Appendix 6: AASR and NIS Addendum 2026
Appendix 7: Ornithological Report 2026
Appendix 8: Draft Noise Complaint Management Protocol

Executive Summary

The world is on fire!

To combat the effects of climate change, Ireland must decarbonise its economy by 2050. There is no "silver bullet" or magic solution to do so. It will take hundreds, if not thousands, of individual renewable energy projects to decarbonise the Irish economy. The scale of the challenge we face to decarbonise the Irish economy is enormous, but the climate change implications of not doing so are even greater. There is no other way to decarbonise a modern society except through renewable energy projects such as the Proposed Development.

In 2020, Ireland was confirmed as a world leader in onshore wind energy, with no other country providing a greater share of its electricity from onshore wind, when a total of 40.23% of the country's electricity was generated from renewable sources, the vast majority of which came from onshore wind. As a country, we only became world leaders by consenting and building one wind farm at a time. Now, with the Government's Climate Action Plan requiring the amount of onshore wind energy to increase from just over 5,000MW to 9,000GW by 2030 (just four years away), hundreds of additional wind farms will have to be connected to the national grid over the rest of this decade.

In the same way that we only achieved our 2020 target of 40% renewable electricity target one wind farm at a time, we will only get to our new target of 9,000MW of onshore wind energy by 2030, one wind farm at a time. The Croagh Wind Farm Project with an estimated installed capacity of 48MW will contribute towards the Government's Climate Action Plan's 9,000MW target for installed onshore wind energy and target of 80% renewable electricity. The 80% renewable electricity target must be achieved by 2030. Not 2040. Not 2050. By 2030.

The global climate is breaking down as a result of greenhouse gas emissions from the burning of fossil fuels. News stories of climate change-related extreme weather events are now a constant in the daily news cycle.

Greenhouse gas emissions continue to rise, annual average amounts of rainfall and annual average air temperatures are increasing, sea levels continue to rise and oceans are getting warmer. There is now an overwhelming consensus amongst scientific and political leaders on the need for rapid, dramatic and systemic change to combat the effects of climate change and decarbonise the global and Irish economies through the use of renewable energy.

The conflict in the Middle East has highlighted Ireland's ongoing acute dependence on imported fossil fuels and the urgent need to expand indigenous sources of electricity generation, such as the Proposed Project, in order to maintain stable supply and protect Irish consumers from price fluctuations. Between February and March 2026 average Irish wholesale electricity prices increased by 28.07% leading the Irish Government coming under pressure to bring in emergency financial measures to protect households from rising energy bills[1] [2]. Against this backdrop it is highlighted that Ireland's overall energy import dependency in rose from 78.3% in 2023 to 79.7% in 2024[3].

Consequently, there is now evidentially an even greater need for the Proposed Project than in 2020 when the planning applications were submitted given the urgent need to implement measures to enhance security of electricity supply without delay.

Meeting Ireland's own binding climate obligations and renewable energy generation targets will require a substantial increase in wind energy infrastructure over the coming years.

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[1] *Utilityfair (2026) Energy Prices & Markets Report - 11th March 2026. Available at: https://www.utilityfair.ie/energy-prices-markets-report#:~:text=Wholesale%20Natural%20Gas%20Prices&text=Current%20wholesale%20gas%20prices%20are,following%20an%20Iranian%20drone%20strike. (Accessed 12/03/2026)*

[2] *https://www.irishtimes.com/opinion/editorials/2026/03/05/the-irish-times-view-on-energy-prices-any-state-help-should-be-directed-to-those-who-need-it/*

[3] *First Look: Ireland's Energy Supply and Security of Supply in 2024. August 2025. Available at: https://www.seai.ie/sites/default/files/publications/First-Look-Energy-Supply-and-Security-of-Supply.pdf .*

Every wind farm project counts.

Croagh Wind Farm will count.

with an estimated installed capacity of 48MW is expected to be operational before 2030 and will make a valuable The Croagh Wind Farm Project will provide carbon savings of c.1,655,640 tonnes over the proposed thirty-year lifetime of the wind farm as detailed in Chapter 10 of the submitted Environmental Impact Assessment Report (EIAR) and will directly support the reduction in emissions from the electricity sector and will facilitate emissions reductions across society and all sectors of the economy through the increased supply of renewable energy over the next 30 years.

This report sets out the Applicant's response to the request issued by An Coimisiún Pleanála ('the Commission' / 'ACP') under Section 131 (s131) of the Planning and Development Act 2000 ('the 2000 Act') in relation to the Croagh Wind Farm appeals currently before the Commission (Ref: ABP-321866-25 & ABP-321867-25).

The local planning policy assessment contained in this Report demonstrates that the Proposed Project is fully in compliance with all relevant planning policies and objectives contained in new County Development Plans adopted by Sligo County Council and Leitrim County Council in 2023 and 2024 respectively.

As part of this submission a Landscape and Visual Impact Assessment Response (LVIAR) has been prepared by MKO which demonstrates how the Proposed Project complies with planning objectives related to Landscape and Visual impact in the current County Development Plans for Leitrim and Sligo. The LVIAR identifies that the proposed turbines in Leitrim are appropriately sited for wind energy development and are located within an area equivalent to just 1.24% of total county land that is both designated as "Available Area" for wind energy in the Leitrim County Development Plan 2023-2029 (LCDP) and does not overlap with designated protected landscapes.

The planning applications for the Proposed Project were accompanied by an EIAR and an Appropriate Assessment Screening Report and Natura Impact Assessment (NIS) prepared by MKO in 2020. It is submitted that the findings of the EIAR and AASR and NIS Report remain relevant except where they have been superseded by the updated technical assessments, enclosed with this report, in view of additional survey information and/or up-to-date planning policy or guidelines.

The enclosed updated technical assessments pertain to the issues identified by the Inspector in their previous reports pertaining to both appeals (ACP Ref: 321866-25 & 321867-25) including Landslide Susceptibility, Impact on Natura Sites, Impact on Bird Species, Visual Impact and Noise Impacts. Overall, the enclosed updated technical assessments verify and support the findings of the technical assessments contained in the submitted EIAR and AASR and NIS Report.

1. CROAGH WIND FARM REMITTAL RESPONSE

1.1 Introduction

This report has been prepared by MKO in response to the request issued by An Coimisiún Pleanála ('the Commission' / 'ACP') under Section 131 (S131) of the Planning and Development Act 2000 ('the 2000 Act') in relation to the Croagh Wind Farm Appeals currently before the Commission (Ref: ABP-321866-25 & ABP-321867-25)[4].

The Croagh Wind Farm Project ('the Project') is split across two local authority areas, County Leitrim (LCC. Pl. Ref. 20.120) and County Sligo (SCC Pl. Ref. 20/251). The Project constitutes the provision of a ten-turbine wind farm and all associated works on lands in Counties Leitrim and Sligo with 8 No. turbines proposed within the functional area of Leitrim County Council and 2 No. turbines proposed within the functional area of Sligo County Council.

The Proposed Project site is located in an upland area on the north-eastern slopes of Carrane Hill and the wind farm infrastructure is located approximately 3.8 kilometres west of Drumkeeran and approximately 7.5 kilometres southeast of Dromahair at its closest point. The Grid Reference coordinates for the approximate centre of the site are ITM X 584650, Y 823261.

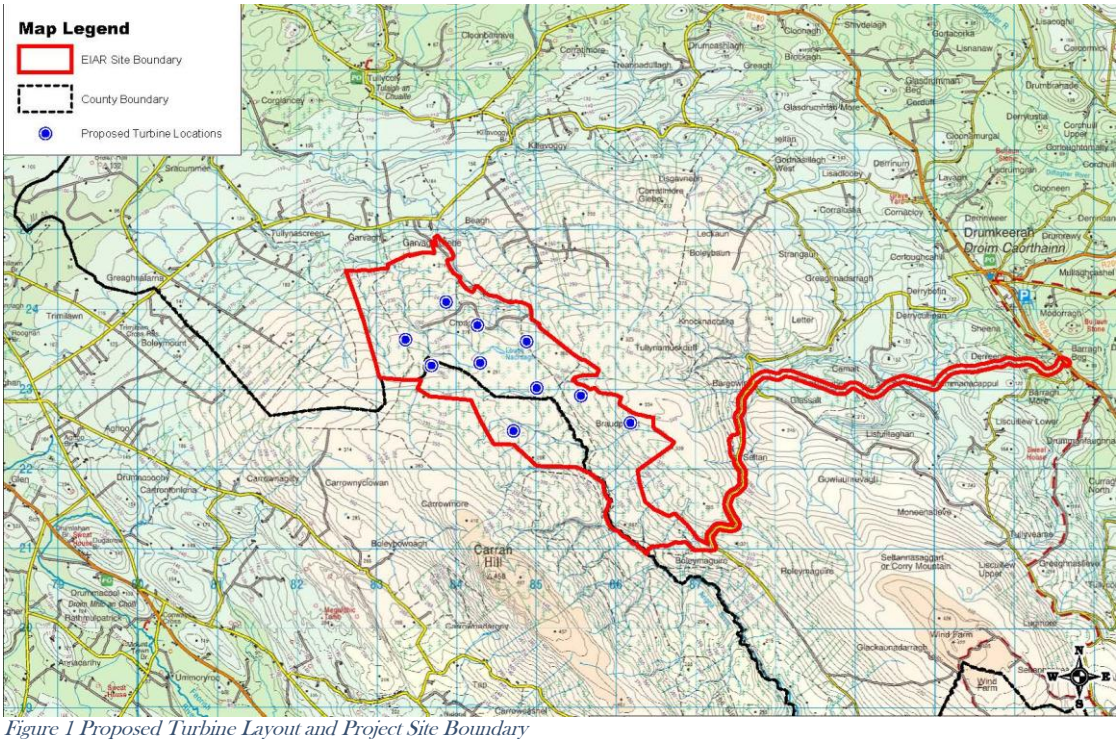


Figure 1 Proposed Turbine Layout and Project Site Boundary

The Commission issued a letter on 23rd February 2026, under Ref. ABP-321867-25, detailing a request under section 131 of the Planning and Development Act 2000 to make any further general submissions/observations on the planning appeal and on the Leitrim County Development Plan 2023-2029 with a deadline of **16th March 2026**.

[4] *The Croagh Wind Farm Appeal (LLC - ABP Ref. ABP-321866-25 and SCC - ABP Ref. ABP-321867-25) has been remitted to the commission following the Order of the High Court on 19th December 2024 quashing the Commission's decision to refuse permission under APB Ref. 310789 and ABP Ref. 310788).*

The Commission subsequently issued a letter on 26th February 2026, under Ref. ABP-321866-25, detailing a request under section 131 of the Planning and Development Act 2000 to make any further general submissions/observations on the planning appeal and on the Sligo County Development Plan 2024-2030 with a deadline of **18th March 2026**.

This report together with the enclosed appendices present a comprehensive response to both S131 requests (Ref. ABP-321866-25 and ABP-321867-25) in relation to the Croagh Wind Farm Project, including those elements within both County Sligo and County Leitrim.

Given the passage of time since the planning applications were submitted in July 2020, and the evolution of planning and climate legislation and policy since then, this report sets out an updated assessment of the Croagh Wind Farm Project against current legislation at EU and National level and National, regional and local planning policy, including notably the new County Development Plans adopted by Sligo County Council (SCC) and Leitrim County Council (LCC) in 2023 and 2024 respectively. This report provides an appraisal of the Proposed Project in the context of current international, national, regional and local policy. Section 1 below presents a summary of the planning history of the Project.

Section 2 presents key updates to the legislative framework within which the planning appeals will be considered.

Section 3 presents an updated review of National climate and planning policy demonstrating that the Proposed Project, and the original submission, complies with all relevant planning policy objectives, related policy, and Climate Change targets.

Section 4 presents an updated local planning policy assessment demonstrating that the Proposed Project, and the original submission, complies with all relevant planning policy objectives of the Sligo County Development Plan 2024-2030 and the Leitrim County Development Plan 2023-2029 respectively.

Section 5 sets out a summary of the supplementary information submitted as part of this response which pertains to the issues raised by the Inspector in their reports on the previous appeals (ACP Ref: 321866-25 & 321867-25). Supplementary information is contained within the following technical appendices enclosed within the Report:

- **Appendix 3 - Landscape and Visual Impact Assessment Response 2026** ('LVIAR') prepared by MKO - demonstrates how the Proposed Project and Chapter 12 of the submitted EIAR complies with planning objectives related to Landscape and Visual impact in the current County Development Plans for Leitrim and Sligo.
- **Appendix 4a- Response to ACP Request for Further Submissions** prepared by Fehily Timony ('Geotechnical s131 Response 2026') - provides a response to the Geo-technical matters raised in the Inspector's reports.
- **Appendix 4b Peat Stability Risk Assessment Technical Note 2026** prepared by AGL Consulting provides a technical review of the previously submitted geotechnical and peat stability
- risk assessment in response to the concerns raised over the adequacy of same in the Inspector's reports.
- **Appendix 5 – 2025 Ecological Survey Report** prepared by MKO ('Ecological Report ') – focused on confirming the accuracy and current condition of the previously mapped habitats, identifying any new occurrences of invasive species and mammal signs, and revisiting two previously recorded badger setts to assess their activity. The findings of the walkover survey provide an updated understanding of the site's ecological features and any changes that may have occurred since the original assessment.
- **Appendix 6 – Appropriate Assessment Screening Report and Natural Impact Statement Addendum** ('AASR and NIS Addendum') – presents the results of updated ecological surveys and a review of all relevant updated Site Specific Conservation Objectives (SSCO's) for European Sites.
- **Appendix 7 - Ornithological Report** prepared by MKO ('Ornithological Report' 2026) – presents an updated Collision Risk Analysis and Updated Impact Assessment and Mitigation drawing on the results of updated ornithology surveys undertaken in 2023-2025 and presents a technical response to the Ornithology issues raised in the Inspector's reports.
- **Appendix 8 - Draft Noise Complaint Management Protocol** prepared by AWN Consulting - outlines a draft protocol for addressing Amplitude Modulation (AM) or tonality.

1.2 Planning History

This Section presents a summary of the planning history of the current appeals (Leitrim Co. Co. Pl. Ref. 20.120, ABP-321867-25 & Sligo Co Co. Pl. Ref. 20/251, ABP-321866-25) going back to July 2020.

On 29th of July 2020 concurrent planning applications were lodged with LCC (Pl. Ref. 20/120) and with SCC (Pl. Ref. 20/251) in relation to those elements of the Project proposed within the functional area of each planning authority.

The project description for the proposed development as sought from **Leitrim County Council** is summarised below:

- 8 No. wind turbines with a maximum overall blade tip height of up to 170 metres;
- 38kV electrical substation and connection of the proposed wind turbines to the national electricity grid, via the existing Garvagh substation;
- Upgrade of existing tracks and roads, provision of new site access roads and hardstand areas;
- Partial demolition and alteration of 2 no. agricultural buildings;
- 1 no. borrow pit and 2 no. peat and spoil repository areas; site drainage; permanent signage and ancillary forestry felling
- Temporary construction compounds;
- Recreation works, including trails, amenity car park and signage; and
- Permanent Signage.

The project description for the proposed development as sought from **Sligo County Council** is summarised below:

- 2 No. wind turbines with a maximum overall blade tip height of up to 170 metres and 1 no. permanent Meteorological Mast with a maximum height of up to 100 metres;
- connection of the proposed wind turbines to the proposed wind farm 38kV electricity substation (proposed in Garvagh Glebe, Co. Leitrim);
- Upgrade of existing tracks, roads and provision of new site access roads;
- Site Drainage and Ancillary Forestry Felling; and
- Recreation works, including trails, amenity car park and signage;
- Permanent Signage.

Both planning applications were accompanied by an Environmental Impact Assessment Report (EIAR), AASR and NIS along with all required statutory planning application documentation, and both applications were ultimately subject to favourable consideration by each planning authority following detailed Further Information Responses, and completion of the relevant Environmental Impact Assessment and Appropriate Assessment processes.

On the 22nd September 2020, following lodgement of the Planning Application (Pl. Ref. 20/120) on the 29th of July 2020, **Leitrim County Council** issued a request in accordance with Section 33 of the Planning and Development Regulations 2001 (as amended) which sought further information in relation to a total of 78 items. MKO on behalf of the applicants submitted a comprehensive further information response on the 7th of April 2021, which was subsequently re-advertised as being significant, to facilitate further

third party engagement. Following review of all application documentation, including EIAR, AASR and NIS, further information response and all relevant submissions and observations **Leitrim County Council** issued their notification of decision to grant permission on the 15th of June 2021 subject to 34 no. conditions. The following conditions are of particular note in the context of the appeal:

- Condition no. 1 requires the development to be carried out in accordance with the plans and particulars lodged with the application on 29th July 2020 as amended by the details contained in the Further Information response submitted to the Planning Authority on 7th April 2021 and in accordance with any details submitted to and agreed by the Planning Authority in order to comply with all other conditions.
- Condition no. 4 requires all construction methods and environmental mitigation methods in the EIAR and the NIS submitted with the planning application to be implemented in full and for a time schedule of mitigation and monitoring to be submitted to the Planning Authority in advance in the interest of clarity and the protection of the environment.
- Condition no. 15 requires annual bird surveys to be undertaken for up to five years and submitted to the Local Authority and the Department of Housing Local Government and Heritage in order to ensure appropriate monitoring of the impact on avifauna.
- Condition no.16 requires the developer to retain an Ecological Clerk or Works to oversee all mitigation measures, compliance with environmental management conditions and environmental reporting requirements in liaison with third parties and the Planning Authority.
- Condition no. 19 requires a Geo-technical Specialist to be employed on site to supervise the siting of all roads/turbine bases in peat areas and peat storage. An Emergency Management Response Plan detailing peat slide monitoring and measures to be taken should an incident occur on site shall be submitted to the Planning Authority in order to protect the quality of surface water, ground water and supported habitats.

On the 18th September 2020, following lodgement of the Planning Application (Pl. Ref. 20/251) on the 29th of July 2020, **Sligo County Council** issued a request in accordance with Section 33 of the Planning and Development Regulations 2001 (as amended) which sought further information in relation to a total of 53 items. MKO on behalf of the applicants submitted a comprehensive further information response on the 7th April 2021, which was subsequently re-advertised as being significant, to facilitate further third-party engagement. Following review of all application documentation, including EIAR, AASR and NIS, further information response and all relevant submissions and observations **Sligo County Council** issued their notification of decision to grant permission on the 15th of June 2021 subject to 20 no. conditions. Similarly, the following conditions are of particular note in the context of the appeal:

- Condition no. 1 requires the proposed development to be carried out in accordance with the submitted plans and particulars including all environmental mitigation measures in the EIAR and the NIS and in accordance with any details submitted to and agreed by the Planning Authority in order to comply with all other conditions.
- Condition no.8 requires an Environmental Monitoring Committee comprising representatives from both local authorities and Inland Fisheries to be established and to monitor each construction phase of the Project including earthworks, surface water run-off and drainage comprising representatives from both local authorities and Inland Fisheries in order to provide appropriate review of the environmental monitoring of the construction phase.
- Condition no. 10 requires annual bird surveys to be undertaken for up to five years and submitted to the Local Authority and the Department of Housing Local Government and Heritage in order to ensure appropriate monitoring of the impact on avifauna. Condition no. 13 requires a Geo-technical Specialist to be employed on site to supervise the siting of all roads/turbine bases in Peat areas, all staff to be trained on the Geo-technical aspects of the site, monitoring of ground conditions throughout construction and that all work must stop where ground movement is observed in order to protect the quality of surface water and ground water. An Emergency Management Response Plan detailing measures to be taken should an incident occur on site shall also be submitted to the Planning Authority.

The decisions by Leitrim County Council (LCC. Pl. Ref. 20.120, ABP Ref. 310789) and Sligo County Council (SCC Pl. Ref. 20/251, ABP Ref. 310788) to grant permission were subsequently appealed to the Commission in July 2021. Both decisions to grant were subject to a first party appeal which solely sought additional clarity and definition to be applied to a single condition (Condition no.1) and its wording in both the decision notices. Following the then recent Derryadd Judgement (2021 IEHC 390 [2020No. 557

JR] P. Sweetman v An Bord Pleanála), the Applicant requested that additional wording be provided within condition no. 1 to provide clarity and precise definition in relation to the proposed wind turbine parameters. Both decisions were subject to 2 no. third party appeals brought by Wild Ireland Defence CLG and Wind Aware Dromahair.

- On 8th December 2022 the Applicant submitted a comprehensive response to Request for Further Information issued by the Commission in respect of both appeals on 11th November 2022 which provided further information on the proposed peat repositories, existing land and ground conditions associated with the same, and on environmental noise impact and mitigation measures in relation to existing houses in the area. The 2022 Further Information Response included the following technical appendices: Appendix 1: Geotechnical and Peat Stability Assessment Response - Prepared by Fehily Timoney and Company
- Appendix 2: Water Quality and Drainage Control Response prepared by Hydro Environmental Services Ltd.
- Appendix 3: Computer-generated, representations of Borrow Pit and Peat & Spoil Repositories prepared by TANTEK 4D
- Appendix 4: Operational Phase Environmental Noise Response Prepared by AWN Consulting
- Appendix 5: An Bord Pleanála Request for Further Information (Ref. 310789).

On the 23rd October 2023, the Commission overturned the decisions of Leitrim County Council (Pl. Ref. 20.120, ABP Ref. 310789) and Sligo County Council (Pl. Ref. 20/251, ABP Ref. 310788) refusing both applications. The 3 no. identical refusal reasons cited on the Board's Orders for both the appeals dated 23rd October 2023 are summarised as follows:

- Reason No. 1 relates to the potential for pollution of waterbodies in the event of a landslide due to the construction of the Croagh Wind Farm development and that the Board cannot be satisfied that the proposed peat repositories would be effective in providing for the permanent retention of peat and that the proposed peat mitigation measures would not be adequate considering the proposed drainage system.
- Reason No. 2 relates to the potential for adverse effects on the integrity of certain European sites in the event of a landslide due to the construction of the Croagh Wind Farm development and subsequent pollution of downstream waterbodies.
- Reason No. 3 relates to the potential cumulative impacts on sensitive bird species and that the Board cannot be satisfied, in the absence of data monitoring the impacts of the existing wind farm developments in the vicinity of the Croagh Wind Farm site, that the cumulative environmental assessment of the likely effects on bird species can reasonably exclude the possibility of a significant impact.

On 19th December 2024, the Commission's decisions on both the Leitrim County Council (APB Ref. 310789) and Sligo County Council (ABP Ref. 310788) appeals were quashed by Order of the High Court and both appeals remitted to ACP for a new decision. The appeal cases were reopened under ABP-321867-25 and ABP-321866-25 respectively.

2. LEGISLATIVE CONTEXT

This Section presents a summary of key updates to the legislative framework since the concurrent planning applications for the Croagh Wind Farm Project were submitted in 2020.

2.1 Climate and Renewable Energy Legislation

2.1.1 European Legislation

The Renewable Energy Directive (RED) is the EU's legal framework for the development of renewable energy across all sectors of the EU economy, supporting clean energy cooperation across EU countries. Since its adoption in 2009, the RED has evolved through three major iterations-RED I (2009), RED II (2018), and RED III (2023)-each raising ambition to support decarbonisation and energy security. Under RED II, Member States were previously legally required to meet a 20% share of renewables in final energy consumption by 2020. RED III, which entered into force in November 2023, raised the target further to 42.5% by 2030, with an indicative ambition of 45%, in line with the REPowerEU Plan. However, the latest SEAI National Energy Projections 2025 report finds '*Overall renewable energy share is projected to fall short of the Renewable Energy Directive (RED) 2030 target by 9 to 15 percentage points'*. (p13).

Central to RED III is the presumption that renewable energy development must be considered to be in the overriding public interest when addressing competing interests under the Habitats Directive (92/43/EEC), Birds Directive (2009/147/EEC) and the Water Framework Directive (2000/60/EC). The recognition of renewable energy projects being in the 'overriding public interest' was originally introduced under Article 3(1) of emergency Regulation 2022/2577 of 22nd December 2022 named 'laying down a framework to accelerate the deployment of renewable energy' in response to REPowerEU which found that the permitting process is the biggest bottleneck for deploying wind at scale, with approximately 80 GW of wind power capacity stuck in permitting procedures across Europe.

Article 16f of RED III states: '*By 21 February 2024, until climate neutrality is achieved, Member States shall ensure that, in the permit-granting procedure, the planning, construction and operation of renewable energy plants, the connection of such plants to the grid, the related grid itself, and storage assets are presumed as being in the overriding public interest and serving public health and safety when balancing legal interests in individual cases for the purposes of Article 6(4) and Article 16(1), point (c), of Directive 92/43/EEC, Article 4(7) of Directive 2000/60/EC and Article 9(1), point (a), of Directive 2009/147/EC.'*

Given that, of 27 EU member states, Ireland had one of the lowest proportions of renewable energy at 16% in 2024[5], the implementation of RED III represents both a legal obligation and an opportunity to remove procedural bottlenecks that hinder critical infrastructure, such as the Proposed Project.

2.1.2 National Legislation

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

The Climate Action and Low Carbon Development Act 2015 (as amended) ('the Climate Act') establishes a legislative precedent to reduce Ireland's carbon emissions. The Climate Act legally binds Ireland to achieve net-zero emissions no later than 2050, and to a 51% reduction in emissions by 2030. The Climate Act also provides that Government must adopt carbon budgets that are consistent with the Paris agreement and other international obligations and that actions for each sector will be detailed in the Climate Action Plan which must be updated annually.

[5] *https://ec.europa.eu/eurostat/statistics-explained/index.php?title=File:Renewable_energy_2024_infographic.jpg*

The first national carbon budget programme proposed by the Climate Change Advisory Council (CCAC), approved by Government and adopted by both Houses of the Oireachtas in April 2022 comprises three successive 5-year carbon budgets[6]. The total emissions allowed under each budget are shown in Table 1.

Table 1 Carbon Budgets of the Climate Change Advisory Council

	2021 – 2025 Carbon Budget 1	2026 – 2030 Carbon Budget 2	2031 – 2035 Provisional Carbon Budget 3
	All Gases		
Carbon Budget (Mt CO2eq)	295	200	151
Annual Average Percentage Change in Emissions	-4.8%	-8.3%	-3.5%
The Figures are consistent with emissions in 2018 of 68.3 Mt CO2eq reducing to 33.5 Mt CO2eq in 2030, thus allowing compliance with the 51% emissions reduction target by 2030.			

Section 6C of the Climate Act provides that the Minister shall prepare, within the limits of the carbon budget, the Sectoral Emissions Ceilings. These ceilings set out the maximum amount of GHG emissions that are permitted in each sector. The Government approved Sectoral Emissions Ceilings on 28 July 2022. The electricity sector is allocated a sectoral ceiling of 40 MtCO2eq for the first budget (2021-2025) and a sectoral ceiling of 20 MtCO2eq for the second budget period (2026-2030). In 2024, electricity sector emissions were reported to be 6.3 MtCO2eq[7].

The Environmental Protection Agency (EPA) reported in May 2025[8] that the first two carbon budgets (2021-2030) – which aim to support achievement of the 51% emissions reduction target - would not be met. The first carbon budget is now projected to be exceeded by 3% to 4% while the second carbon budget is forecast to be exceeded by a significant margin of between 38% to 57%.

The EPA analysis shows a widening gap between projected emissions reductions based on planned climate policies and measures and the 51% emissions reduction target based on updated information provided by Governmental bodies. It states that '*planned climate policies and measures, if fully implemented, could deliver up to 23% emissions reduction by 2030 compared to 2018, down from the 29% reduction projected last year.'*

The EPA analysis highlights that the increasing gaps to reaching our European and National emission reduction targets point to the need to accelerate and scale up the transition to an environmentally sustainable and climate-neutral economy.

The Proposed Project will provide carbon savings of c.1,655,640 tonnes over the proposed lifetime of the wind farm as detailed in Chapter 10 of the submitted EIAR and will directly support the reduction in emissions from the electricity sector and will facilitate emissions reductions across society and all sectors of the economy through the increased supply of renewable energy in the medium-term over the next c. 30 years.

Section 15(1) of the Act below places an obligation on public bodies to exercise their functions in favour of climate concerns when making decisions, unless it is objectively impracticable to do so, it states:

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

[6] *Climate Change Advisory Council Carbon Budget Technical Report (October 2021)* https://www.gov.ie/en/publication/9af1bcarbon-budgets/
[7] *Climate Change Advisory Council Annual Review 2025 (April, 2025)* https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR2025-Electricity-FINAL.pdf
[8] https://www.epa.ie/news-releases/news-releases-2025/epa-projections-show-ireland-off-track-for-2030-climate-targets.php

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

The most recent Climate Action Plan (CAP 25), the most recent long term climate action strategy (Ireland's Long-term Strategy on Greenhouse Gas Emissions Reduction 2024) and the furtherance of the national climate objective, with which Consenting Authority's decisions must be consistent, all support the development of onshore wind energy in accordance with proper planning and sustainable development.

The implications for public bodies in exercising their functions in accordance with Section 15 of the Climate Act has been scrutinised by the Irish legal system in recent years. The legal analysis of Section 15 has arisen from a challenge to a decision of the Commission to refuse planning permission for a wind farm in County Laois.

The Supreme Court issued a judgment on this matter on 4th February 2026 (Coolglass Wind Farm Limited v An Coimisiún Pleanála [2026] IESC 5) and which establishes that consenting authorities must make decisions in a manner 'consistent with' the approved national long term climate action strategy, 'in so far as is practicable'. This means that departure from climate objectives is permissible but only where there are genuine practical difficulties that make full alignment impracticable.

An Coimisiúin Pleanála (ACP), in making a decision on these cases, must meaningfully engage with national climate objectives when exercising their decision-making functions. ACP must also ensure that their decision on an application falls within a spectrum of outcomes which can be considered to be consistent with, in so far as practicable, national climate objectives.

3. NATIONAL AND REGIONAL POLICY

This Section presents a summary of key updates to National climate and planning policy demonstrating that the Proposed Project, is critical to helping Ireland fulfil its climate change objectives and addressing the country's over-dependence on imported fossil fuels and enhancing security of supply through the deployment of in Ireland's indigenous energy resources.

3.1 Project Ireland 2040: National Planning Framework

One of the overarching themes of the Revised National Planning Framework (NPF) (April 2025) is to facilitate the transition towards a low carbon energy future as reflected in the **Nation Strategic Outcome 8** (*Transition to a Carbon Neutral and Climate Resilient Society*). In creating Ireland's future energy landscape, new energy systems and transmission grids will be necessary to enable a more distributed energy generation which connects established and emerging energy sources, i.e. wind energy.

Ireland's national energy policy under **National Strategic Outcome 8** notes that in creating Ireland's future energy landscape, new energy systems and transmission grids will be necessary to enable a more distributed energy generation which connects established and emerging energy sources, i.e. renewables, to major sources of demand.

Chapter 9: Climate Transition and Our Environment, aims to address key national environmental challenges including the transition to a climate neutral economy, sustainable land management, renewable energy and resource efficiency. As per **National Policy Objective (NPO) 70**, the Revised NPF highlights the importance of renewable energy infrastructure to achieve national climate action targets.

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

Regional Renewable Energy Capacity Allocations have been introduced under the Revised NPF. This was one of the key actions for CAP24 and is supported under CAP25. The Northern and Western Region, in which the Proposed Project is located, is allocated a target of installing an **additional 1,389 MW of onshore wind energy by 2030.**

Under **NPO 74** Regional Assemblies are required to plan for the delivery of the regional renewable electricity capacity allocations outlined in the Revised NPF and identify allocations for each of the local authorities within their RSES. Furthermore, **NPO 75** requires Local Authorities to plan for the delivery of Target Power Capacity (MW) allocations consistent with the relevant RSES, through their City and County Development Plans.

At the time of writing, no local Target Power Capacity allocations have been established, however it is clear from the regional allocation that the Northern and Western Region is set to deliver a significant amount of onshore wind energy in the coming years.

While it is clear that progress is on-going, it is also apparent that there are still challenges which will need to be overcome if Ireland is to achieve its long-term targets for renewable electricity generation and to improve and maintain energy security into the future.

The Croagh Wind Farm Project will facilitate the achievement of National and Regional renewable electricity generation targets, enhance future energy security and expand strategic electrical grid infrastructure in line with the Revised NPF's national energy policy.

3.2 Climate Action Plan 2025

Originally published in 2019 and subsequently revised in 2021, 2023, 2024 and 2025 the Climate Action Plan (CAP) underscores the growing imperative to increase the presence of renewable energy generators on the national grid.

CAP 25 represents the third statutory update to Ireland's climate roadmap under the Climate Act. Building on the foundations laid by previous plans, CAP25 refines and strengthens the strategies necessary to deliver Ireland's legally binding carbon budgets and sectoral emissions ceilings. It sets out a clear trajectory to reduce greenhouse gas emissions by 51% by 2030 and to achieve climate neutrality no later than 2050.

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

Ireland continues to face highly complex climate challenges, as detailed in a recent EPA publication from July 2024 titled 'Ireland's State of the Environment Report 2024'. This report notes that the overall current assessment for climate in Ireland is '*poor'* and "*largely not on track to meet policy objectives and targets"* and urges the full implementation of actions set out in the CAP25, in addition to various other actions, for Ireland to have any chance of meeting its 2030 and 2050 climate targets. The latest SEAI National Energy Projections 2025 report finds that '*Even with full delivery of the CAP it is likely that the energy sector will exceed its share of Ireland's national legally binding carbon budget for the first two budget periods. While reductions in electricity generation emissions have helped narrow the gap to achieving the first carbon budget, the second carbon budget will require a significantly greater effort to remain within limits'. (p3)* The report highlights the cumulative nature of carbon budgets which means any shortfall in Carbon Budgets 1 and 2 will carry over into the next carbon budget period and add to the challenge.

The Croagh Wind Farm Project with an estimated installed capacity of 48MW is expected to be operational before 2030 and will make a valuable contribution to the Government's 2030 9 GW onshore wind target. The increased deployment of onshore wind projects, such as the Proposed Project, is critical to meeting the Government's 2030 renewable electricity target which is a cornerstone of the CAP and will help to facilitate emissions reductions across society and all sectors of the economy.

3.3 National Energy Security Framework

Energy security is an increasingly important issue that the Government has sought to prioritise. The National Energy Security Framework ('NESF') was launched by the Government in April 2022. The Framework outlines the structures which are in place within Government to monitor and manage the State's energy supplies and sets out the plans which are in place to deal with energy security issues to be adopted. The Framework also sets out how it is already ensuring Ireland's energy security and how it will speed up the country's shift to increased energy efficiency and indigenous renewable energy systems. One of the key themes of the Framework is reducing the State's dependency on imported fossil fuels.

Theme 3 of the NESF aims to reduce our dependency on imported fossil fuels in the context of the phasing out of Russian energy imports across the EU. It highlights that replacing fossil fuels with renewables, including wind energy, will be a focus area of work. The NESF 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."* In particular, the following 'responses' are specifically proposed under Theme 3 to phase out fossil fuels and increase renewable energy generation:

- **Response 27:** Accelerate investment in the electricity grid and the development of storage technologies.

Having regard to the above, it is noted that energy security is now a National Policy priority and there is clear need for long term energy security.

Ireland currently has one of the highest external dependencies on imported sources of fuel for energy use. In August 2025 the SEAI published 'First Look: Ireland's Energy Supply and Security of Supply in 2024', which identifies that in 2024, Ireland's national primary energy requirement remained heavily fossil dependent, with 81.4% of energy requirement satisfied by fossil fuels, down only marginally from 82.8% in 2023. However, Ireland's overall energy import dependency in 2024 was 79.7%, up from 78.3% in 2023. The SEAI has stated that Irelands heavy dependence on imported fossil fuels, *"is a lost opportunity in terms of keeping this money here in Ireland and further developing our abundant renewable resources"*.

The '*National Energy Projections 2024*'[10], published annually by the SEAI, state that in 2022, 87% of all energy used in Ireland was from fossil fuels, 12% from renewable sources and the remainder from others such as waste and electricity imports. By 2030, fossil fuels could still provide most of Ireland's energy, ranging from 70% in the 'With Existing Measures' (WEM) scenario' to 62% in the most ambitious 'With Additional Measures (WAM) scenario'. The deployment of renewables needs to outpace the growth of energy demand for the absolute reductions in greenhouse gas emissions that are required to be met.

Overall, Ireland continues to be hugely energy import-dependent leaving it exposed to large energy price fluctuations and possibility of fuel shortages if a major energy crisis were to occur. The international fossil fuel market is growing increasingly expensive and is increasingly affected by international politics which can add to price fluctuations as seen during March 2026. Geopolitical tensions in the Middle East have created a surge in oil and gas costs leading to a sharp increase in Irish wholesale electricity prices over March 2026. As of, March 11th 2026, Irish wholesale electricity prices are trading at a monthly average of €138.29 per MWh which are 28.07% higher than February 2026, or 5.04% higher than March 2025 (last year), but still lower than February 2025[11].

The Croagh Wind Farm Project represents a significant investment in the electricity grid and, with an estimated installed capacity of 48MW, will contribute towards improving the security of energy supply across the State in accordance with EU and National policy objectives by providing an indigenous energy resource at a stable price.

3.4 Regional Planning Policy

The Proposed Project is located in both County Leitrim and County Sligo, both of which fall within the administrative area of the Northern and Western Regional Assembly (NWRA), established in 2015.

The Northern and Western Regional Spatial and Economic Strategy 2020-2032 (RSES) aims to build on the region's strengths and potential to become a more prosperous, sustainable, climate resilient and attractive region for the benefit of all its people up to 2040 and beyond.

The RSES acknowledges that the region has a pivotal role in delivering a successful transition to Ireland's proposed low carbon economy with huge potential for growth in renewables given that the Region has '*a unique natural endowment of ample carbon-neutral, energy supplies*' such as wind.

In order to facilitate the growth of renewables within the region, the RSES notes that the NWRA aims to encourage stakeholders, to be the first to facilitate new opportunities and concentrate on possibilities to

[9] *Dr Eimear Cotter, Head of Low Carbon Technologies, SEAI - "Energy Security in Ireland 2015"*
[10] *First Look: Ireland's Energy Supply and Security of Supply in 2024. August 2025. Available at: https://www.seai.ie/sites/default/files/publications/First-Look-Energy-Supply-and-Security-of-Supply.pdf .*
[11] *Utilityfair (2026) Energy Prices & Markets Report - 11th March 2026. Available at: https://www.utilityfair.ie/energy-prices-markets-report#:~:text=Wholesale%20Natural%20Gas%20Prices&text=Current%20wholesale%20gas%20prices%20are,following%20an%20Iranian%20drone%20strike. (Accessed 12/03/2026)*

further advance renewable energy generation and use. These strategic aims are captured in Regional Policy Objectives (RPOs) 4.17 and 4.18:

- ***RPO 4.17****: To position the region to avail of the emerging global market in renewable energy by stimulating the development and deployment of the most advantageous renewable energy systems, including:*
  - *Stimulating the development and deployment of the most advantageous renewable energy;*
  - *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*
- ***RPO 4.18****: Support the development of secure, reliable and safe supplies of renewable energy, to maximise their value, maintain the inward investment, support indigenous industry and create jobs.*

The RSES is 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. In this regard, the Croagh Wind Farm Project will facilitate the integration of increased levels of renewable energy onto the national grid, while also improving the security of supply as detailed in the Section above. The Proposed Project capitalises on the region's potential to become a more prosperous, sustainable, climate resilient and attractive region in line with the overall objective of the RSES.

4. LOCAL PLANNING POLICY

This section details how the Proposed Project demonstrates compliance with planning policies and objectives related to renewable energy policy and targets and climate change policy and targets in the current Leitrim County Development Plan (LCDP) and Sligo County Development Plan (SCDP).

4.1 Leitrim County Development Plan 2023-2029

The Leitrim County Development Plan 2023-2029 (LCDP) includes a suite of policies and objectives which are pertinent to the assessment of wind energy development projects. These policies and objectives are set out in 2 no primary locations:

- Volume 1 – Written Statement LCDP 23-29
- Appendix X – Part A: Leitrim County Renewable Energy Strategy & Part B: Landscape & Visual Capacity Study for Windfarms

For the purposes of this Report, a concise summary of relevant policies and objectives will be outlined in the body of the Report while a comprehensive Statement of Consistency assessing the proposed development against all pertinent policies and objectives is included in Appendix 1.

The purpose of this concise summary is to illustrate that the principle of development is consistent with the provisions of the LCDP 2023-2029. In the first instance, the Commission will note that at Section 2.2 of the LCDP, Strategic Aims for the County are identified. Strategic Aim No.13 is as follows:

'To support, in principle, development that addresses climate change in terms of adaptation and mitigation measures including increasing flood resilience, the promotion of sustainable transport options and the development of renewable energy technologies where possible to achieve a successful transition to a low carbon economy.' [12]

The LCDP goes on to outline a series of Strategic Objectives which are intended to underpin the Strategic Aims set out in Section 2.2. Strategic Objective No. 8 states the following:

'To support the development of key infrastructure such as telecommunications, electricity and sources of renewable energy to enable and facilitate economic development.' [13]

Figure 6.3 of Appendix X – Part A: Leitrim County Renewable Energy Strategy (LCRES) comprises a map which identifies 'Available Areas' for wind energy development. Section 6.1.5 [14] of the LCRES outlines the methodology and considerations utilised by the Planning Authority in defining these areas and this can be summarised broadly as follows:

- 2006 Wind Energy Development Guidelines (2006) (WEDGS) Draft Revised Wind Energy Development Guidelines December 2019 (Draft WEDGS)
- Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate 2017
- Environmental, heritage and amenity features, but excluding landscape and visual amenity

The Commission will be aware that the above-referenced 2017 Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate have since been revoked by the Minister on 16th December 2022.

[12] *LCDP 2023-2029 – Leitrim County Council – 2023 – Section 2.2 – Available at https://www.leitrim.ie/council/services/planning-building/forward-planning-development/leitrim-county-development-plan/volume-i-written-statement-lcdp-23-29.pdf*
[13] *LCDP 2023-2029 – Leitrim County Council – 2023 – Section 2.2 – Available at https://www.leitrim.ie/council/services/planning-building/forward-planning-development/leitrim-county-development-plan/volume-i-written-statement-lcdp-23-29.pdf*
[14] *LCDP 2023-2029 – Leitrim County Council - Appendix X – Part A: Leitrim County Renewable Energy Strategy – Section 6.1.5 – Available at https://www.leitrim.ie/council/services/planning-building/forward-planning-development/leitrim-county-development-plan/appendix_x_-_part_a_-_leitrim_county_renewable_energy_strategy.pdf*

Section 6.1.5 of the LCRES goes onto state that having identified 'Available Areas' in Figure 6.3 of the Strategy, a further technical/mapping exercise was carried out to examine risk factors within these potentially available areas. This technical mapping exercise assigns a colour ramped risk level of the provision of wind energy development within 'Available Areas'. For completeness, **Figure 2** below includes both the 'Available Area' mapping and the 'Risk Factor' mapping described above and identifies the extent of the proposed development site (the extent of which is located in County Leitrim). The Commission will note that the entirety of the proposed development site is located within a mapped '*Available Area'* and that the risk categorisation is predominantly '*Low*'. Figure 3 shows the proposed turbine locations are all located within the 'Available Areas' for wind energy development in the LRES. Therefore, the development proposal accords with the Strategic Aims and Objectives of the LCDP, i.e. comprising a renewable energy development, and is located in an area where the Planning Authority has identified availability for wind energy development.

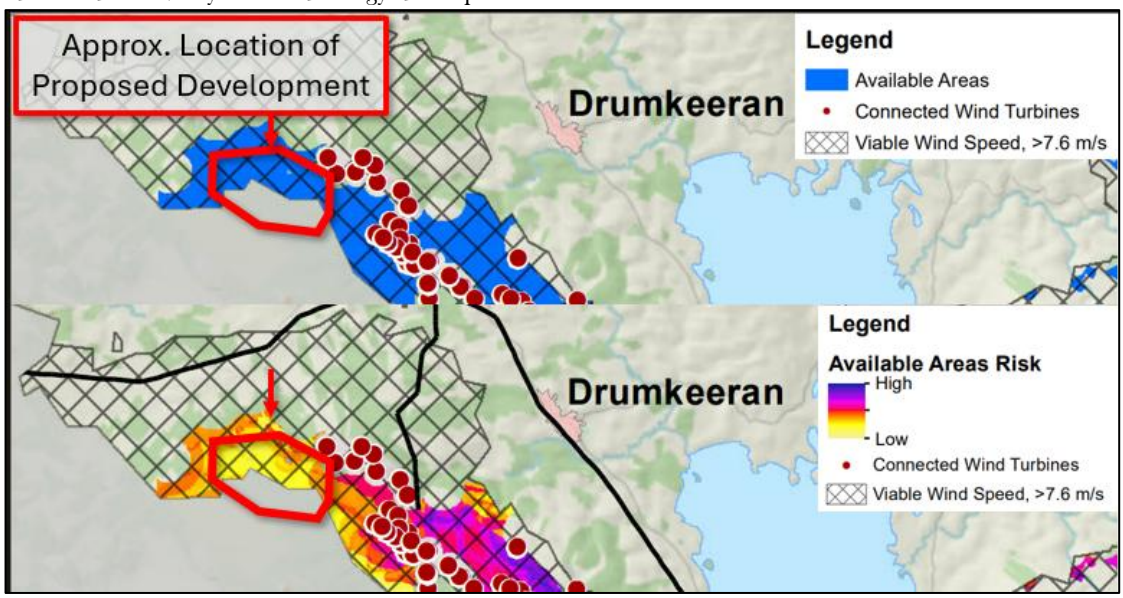


Figure 2 Location of Proposed Development in "Available Area" of "Low Risk" with "Viable Wind Speed >7.6m/s" in LRES (Source: modified from Figs. 6.3 and 6.4 of Leitrim County Renewable Energy Strategy)

Further analysis of this available area by the Planning Authority, based on relevant guidance documents (WEDGS & Draft WEDGS) has established that the Proposed Project site is mostly located in an area with a low level of risk in the context of potential impacts associated with wind energy development including groundwater vulnerability, geological heritage sites, soil drainage, landslide and flooding susceptibility as shown in Figure 6.4 of the LRES (also see Figure 2 below). However, it is noted that this risk s categorisation excludes landscape and visual amenity considerations which we consider further below.

The Proposed wind farm infrastructure lies within Landscape Character Area (LCA) 11 - Corry Mountain Uplands as defined within the Landscape and Wind Turbine Study contained in Appendix X – Part B of the LRES in the LCDP 2023-2029. It states that some potential to accommodate wind turbines in LCA 11 may exist subject to detailed design and assessment and notes that there is potential for adverse cumulative effects with existing wind farms in the north west area of LCA 11.

The enclosed LVIAR (Appendix XX) finds that, in terms of landscape character, only Leitrim's LCA 11 Corry Mountain would experience direct effects on landscape character as a result of the proposed development. Any other effects on other LCAs would be moderate, indirect and a slight increase in visible turbines additional to the existing and permitted turbines.

With regard to cumulative landscape and visual effects, Chapter 12 of the submitted EIAR Section 12.8 concludes that: '*Although it was found that the proposed turbines will add to the cumulative landscape status, they will not change the character of the individual LCAs in terms of wind energy and therefore the cumulative landscape effects are considered "Low." The cumulative visual effects are considered acceptable, in terms of increase in spatial extent, visual separation and difference in scale.'*

The enclosed LVIAR finds that '*the landscape character of the study area is of a large scale which contains open, expansive views, and these assist in allowing the landscape to accommodate a large*

number of turbines. It concludes accordingly that '*Considering the sizable amount of wind farm development that has already occurred, the proposed Croagh development will add a limited number of additional turbines.' (p.18)*

The context provided above provides a basis, for it to be concluded that wind energy development on the subject lands in County Leitrim is acceptable in principle subject to consideration against other relevant policies and objectives, development management standards and development specific environmental considerations including landscape and visual considerations. An assessment against all of the foregoing is included in the original planning submission for this development as well as, where relevant, in this Section 131 Response.

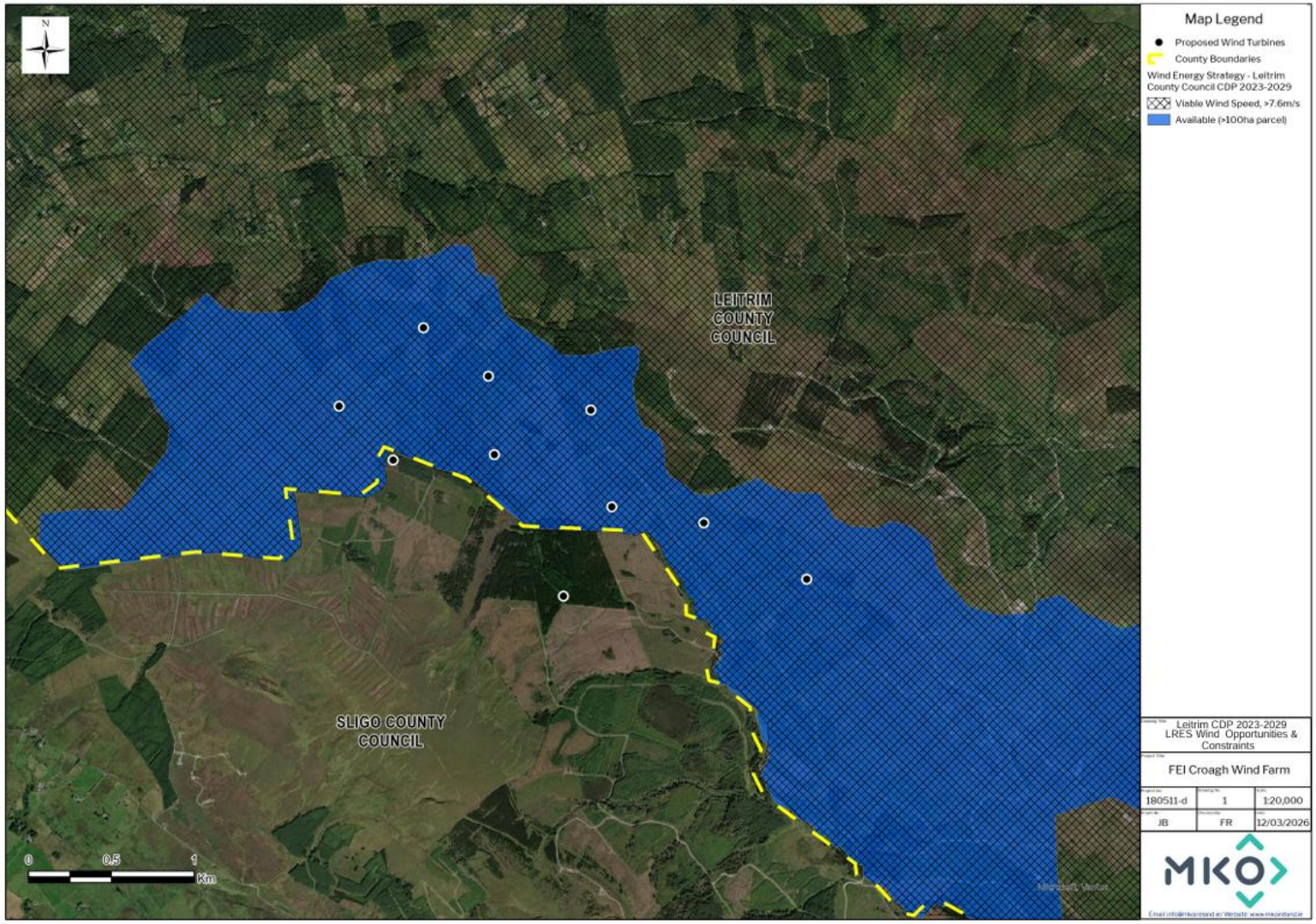


Figure 3 Location of Proposed Development in "Available Area" in LRES (Source: Figure 6.3 of Leitrim County Renewable Energy Strategy)

4.2 Sligo County Development Plan 2024-2030

The Sligo County Development Plan 2024-2030 was adopted on 11th November 2024, except for those parts of the plan which are subject to a Draft Ministerial Direction.

The Sligo County Development Plan 2024-2030 addresses wind energy within the broader context of climate action and energy policies. The plan is divided into several volumes, with Volume 1 focusing on the core strategy and climate action, and Volume 3 detailing general policies, including energy and telecommunications.

For the purposes of this Report, a concise summary of relevant policies and objectives will be outlined in the body of the Report while a comprehensive Statement of Consistency assessing the proposed development against all pertinent policies and objectives is included in Appendix 2.

The Climate Action Chapter (Volume 1 -Chapter 2) emphasises the critical role of climate action in addressing global challenges. It aligns with the Climate Action and Low Carbon Development (Amendment) Act 2021, which aims to halve Ireland's greenhouse gas emissions by 2030 and achieve carbon neutrality by 2050. The key policies set out in Chapter 2 are as follows:

- ***SP-CA-1*** *Support the implementation of the government's climate action policy in accordance with the Climate Action and Low Carbon Development (Amendment) Act 2021, the national Climate Action Plan 2023, the National Adaptation Framework 2018 and all subsequent relevant updates.*
- ***SP-CA-2*** *Ensure that Sligo County Council's Climate Adaptation Strategy, Climate Action Plan and County Development Plan are fully aligned.*
- ***SP-CA-3*** *Integrate appropriate climate mitigation and adaptation considerations and measures into all relevant development management and development planning processes.*

The effect of these policies is that the Sligo County Development Plan (SCDP) shares the goals and targets outlined in government climate action policy including the Climate Act 2021 and the Climate Action Plan 2025 (i.e. as per reference in SP-CA-1 to 'all subsequent relevant updates). Therefore, the SCDP, in principle, supports the delivery of renewable energy development to reduce carbon emissions and to meet renewable energy generation targets/share.

Chapter 31 of the SCDP sets out the policy context for the County's energy strategy. County Sligo's role in the delivery of renewable energy resources is acknowledged within the SCDP, with the statement that *'Sligo is well-placed to lay solid foundations for s sustainable energy future while boosting investment, business development, job creation and contributing to greater energy security,'* The SCDP sets out a number of County Development Plan objectives relating to renewable energy, including the following:

- ***P-EN-1:*** *Support the sustainable development, upgrading and maintenance of energy generation, transmission, storage and distribution infrastructure, to ensure the security of energy supply and provide for future needs, as well as protection of the landscape, natural, archaeological and built heritage, and residential amenity.*

- ***P-EN-2:*** *Facilitate the production of energy from renewable sources and secure the maximum potential from wind energy resources within County Sligo, including the augmentation, upgrading and improvements to existing wind farms, subject to strict location, siting and design criteria. All such development proposals will be assessed for their potential impact on urban and rural communities, Natura 2000 sites, designated Sensitive Rural Landscapes, Visually Vulnerable Areas, Scenic Routes and scenic views, and all other normal planning considerations.*

- ***O-REN-1:*** *Prepare a Renewable Energy Strategy for County Sligo within one year of the publication of the Regional Renewable Electricity Strategy (NWRA) or the revised Methodology for Local Authority Renewable Energy Strategies (SEAI), as provided for in the Climate Action Plan 2024, whichever occurs first.*

Policies P-EN-1 & P-EN-2 essentially provide the basis for a conclusion that wind energy development in County Sligo is acceptable in principle subject to ensuring the protection of landscape, natural, archaeological and built heritage, and residential amenity as well as ensuring appropriate consideration and assessment of impacts on urban and rural communities, Natura 2000 sites, designated Sensitive Rural Landscapes, Visually Vulnerable Areas, Scenic Routes and scenic views, and all other normal planning considerations. An assessment against all of the foregoing is included in the original planning submission for this development as well as where relevant, in this Section 131 Response.

Policy O-REN-1 outlines SCC's aspiration to prepare a Renewable Energy Strategy (RES) for the County within one year of the *Regional Renewable Electricity Strategy* or *Methodology for Local Authority Renewable Energy Strategies.* This aspiration is welcomed, however, in the absence of a County RES a determination on whether the principle of windfarm development on the subject site, is acceptable or not must be made in accordance with adopted Policies SP-CA-1, SP-CA-2, SP-CA-3, P-EN-1 & P-EN-2. Such an assessment leads to the clear conclusion that the principle of the proposed development is acceptable.

4.3 Principle of Development

As outlined in the previous Sections, and in the appeals submitted previously, and in the appended planning policy analysis, it is considered that the proposed project accords with the relevant international, national, regional and local planning guidance, policies and objectives. As outlined in Section 2.1.2 of this Report, the Commission will be aware of recent legal precedents associated with Section 15 of the Climate Act. The Supreme Court issued a judgment on this matter on 4th February 2026 (Coolglass Wind Farm Limited v An Coimisiún Pleanála [2026] IESC 5) which establishes that consenting authorities must make decisions in a manner 'consistent with' the approved national long-term climate action strategy 'in so far as is practicable'. This means that departure from climate objectives is permissible but only where there are genuine practical difficulties that make full alignment impracticable.

An Coimisiúin Pleanála (ACP), in making a decision on these cases, must meaningfully engage with national climate objectives when exercising their decision-making functions. ACP must also ensure that their decision on an application falls within a spectrum of outcomes which can be considered to be consistent with, in so far as practicable, national climate objectives. It is considered that a grant of planning permission for the proposed project would accord with the overarching goals of the Climate Act and with the Climate Action Plan.

5.

PREVIOUSLY SUBMITTED ENVIRONMENTAL IMPACT ASSESSMENT AND APPROPRIATE ASSESSMENT

The planning applications for the Proposed Project were accompanied by an EIAR and an AASR and NIS Report prepared by MKO in 2020.

The submitted EIAR demonstrates that the Proposed Project will be capable of being constructed, operated and decommissioned without giving rise to any significant impacts on the environment. The submitted AASR and NIS Report concludes that, in view of best scientific knowledge and based on objective information, that the Proposed Project will not adversely affect the integrity of any European Site.

In determining the Leitrim planning application (Ref. 20120), the Leitrim County Council Planner's Report states that the EIAR and supporting documentation submitted by the applicant, *'adequately considers alternatives to the proposed development and identifies and describes adequately the direct, indirect, secondary and cumulative effects of the proposed development on the environment.' (p.79)*

On this basis the Leitrim County Council Planner's Report states that the Planning Authority completed an Environmental Impact Assessment in relation to the Proposed Project and has concluded that, *'subject to the implementation of the mitigation measures set out in the EIAR, and subject to compliance with the conditions set out below, the effects of the proposed development on the environment, by itself and in combination with other plans and projects in the vicinity, would be acceptable. In doing so, the Planning Authority adopted the report and conclusions of the Senior Planner.' (p.79)*

Further, the Planner's Report concludes that '*In completing the Appropriate Assessment, the Planning Authority adopted the report of the Senior Planner and concluded that, by itself or in-combination with other plans and projects in the vicinity, the proposed development would not be likely to adversely affect the integrity of the European Sites, in view of the sites' conservation objectives.' (p.80)*

Equally, in determining the Sligo planning application (Ref. 20/251), the Sligo County Council Planner's Report states that having regard to the EIAR and supplementary information provided by the applicant at Further Information stage, and to submissions from the prescribed bodies consulted under Article 6 of the EIA Directive it is considered that *'any potential impacts on the environment would be avoided, managed and mitigated by the measures which form part of the project, any proposed mitigation measures and through suitable conditions, including monitoring conditions.* Further it states that*: 'The Planning Authority is satisfied that, subject to appropriate mitigation and conditions, the proposed development would not have any significant, unacceptable, direct, indirect, or cumulative effects on the environment'.* (p.64)

The Sligo County Council Planner's Report also concludes that '*it is the Planning Authority's determination that, based on the best available scientific information and subject to the full implementation of the specific mitigation measures detailed in Section 5 of the NIS, as amended by the Further Information submitted on7th April 2021, the proposed development-on its own or in combination with other projects-will not adversely affect the integrity of the Lough Gill SAC, Site Code-001976,CummeenStrand/Drumcliff Bay (Sligo Bay) SAC Site Code-000627 Cummeen Strand SPA SiteCode-004035 or any other Natura 2000 site, either alone or in combination with other plans or project'. (p64)*

Overall, the findings and conclusions of the submitted EIAR and AASR and NIS Report remain relevant except where they have been superseded by the updated technical assessments submitted as supplementary information as part of this S131 response and summarised in Section 6 of this report. The enclosed updated technical assessments verify and support the findings and conclusions of the submitted

EIAR and AASR and NIS Report prepared by MKO in 2020 in view of additional survey information and/or up-to-date planning policy or guidelines.

6. PREVIOUS INSPECTOR'S REPORTS

For the purpose of this submission, we wish to take the opportunity to provide the Commission with supporting information which pertains to the issues identified by the Commission within the Inspector's Reports on the previous appeals (ACP Ref: 321866-25 & 321867-25). The issues that arose in the Inspector's Reports on the previous appeals can be summarised as follows:

- Landslide Susceptibility
- Impact on Natura Sites
- Impact on Bird Species
- Visual Impact
- Noise Impacts

6.1 Landslide Susceptibility

The Inspector's Reports highlighted concerns in relation to the potential for landslide given, inter alia, the geological classification of the site, historical landslide events, topography etc. We refer the Commission to the enclosed Geo-technical s131 Response 2026 report by Fehily Timony (Appendix 4A).

At Section 4.2 of the Fehily Timony Report, responses to the various issues raised in the previous ACP determinations are provided. While it is not intended to reproduce these responses here, we would note that in respect of the geological classification of the site, mapped faults in the vicinity, upland nature of the site, high levels of rainfall, presence of blanket bog etc., these are all characteristics shared by large numbers of existing and permitted windfarm developments around the country and should not, subject to robust assessment as undertaken as part of the subject planning applications, in and of themselves warrant a refusal of planning permission.

The enclosed Peat Stability Risk Assessment Technical Note (Appendix 4B) prepared by ALG Consulting (AGLC) provides a technical review of the geotechnical and peat stability risk assessment contained in Chapter 8 and Appendix 8-1 of the submitted EIAR as well as a review of the design proposals for the bunded peat repository sites and borrow pit cells, turbine foundations and hardstanding areas on the site during construction in response to the concerns raised over the adequacy of same in the Inspector's reports. The Note has also been informed by review of additional ground investigation works carried out on the site in September & October 2025.

The enclosed *AGLC Technical Note concludes in respect of the geotechnical and peat stability risk assessment that 'although there is a history of peat instability in the region, either naturally or due to contributory anthropogenic factors related to mechanical peat harvesting or due to construction activities on other wind farm sites, I would consider that the overall risk of peat instability for the proposed works on the Croagh Wind Farm is relatively low and manageable with appropriate construction management and supervision...' (p5).*

The Commission will note that AGLC concludes that overall, 'the earthworks and drainage design for the wind farm in the EIAR and supporting documents incorporates standard details that can be developed into the detailed design to effectively mitigate the risk of peat instability during construction. It is proposed to carry out supplemental ground investigations on the site to develop the design, which is standard practice, and construction of the wind farm will be supervised by a suitably qualified geotechnical engineer to ensure that peat stability is effectively managed on site.' (p.7)

We would respectfully request that the Commission give due consideration to the enclosed Fehily Timoney Report and AGL Consulting Technical Note in conjunction with ancillary and complementary elements of the planning application submissions, in the context of assessing the potential for landslides to occur. It was previously contended by the Commission that the Proposed Development would, in light of the perceived landslide risk associated with the construction of the wind farm, have an adverse effect on European Sites. It is submitted that, based on all of the information now before the Commission in relation to peat stability and peat and spoil management, that the Project will not adversely effect any European Site either individually or in combination with other plans or projects. The information concerned includes the previously submitted EIAR (Appendix 4-2 and Appendix 8-1), the revised NIS

submitted as part of the further information responses to the local authorities, the December 2022 further information response to the Commission and Appendix 4a/4b and Appendix 6 of this document.

6.2 Impact on Natura Sites

In light of the issues raised in the Inspector's Reports in relation to potential adverse impacts on Natura Sites, and given the passage of time, the applicant has commissioned the undertaking of additional ecological surveys of the subject site and the preparation an addendum to the AASR and (NIS which accompanied the original planning applications.

This AASR and NIS Addendum 2026 (Appendix 6) has been prepared to provide the results of updated ecological surveys of the Proposed Project site undertaken in 2025. These surveys serve to verify the results of the initial surveys and to describe any changes to the ecological baseline since the completion of those surveys which were undertaken between 2017 and 2020.

Since the preparation of the Appropriate Assessment Screening Report (AASR) and NIS which accompanied the planning applications for the Proposed Project in 2020, updated Site-Specific Conservation Objectives (SSCOs) have been published by the National Parks and Wildlife Service (NPWS) for a number of European Sites which were considered in the AASR and NIS. The AASR and NIS Addendum also undertakes a review of all relevant updated SSCOs and an assessment of the potential for adverse effects on relevant European Sites in light of the updated SSCOs.

In summary, the AASR and NIS Addendum assesses whether there are any changes to the overall conclusions of the AASR and NIS submitted with the planning applications for the Proposed Project in light of the updated surveys and SSCOs.

The AASR and NIS Addendum (Appendix 6) and Ecological Report 2026 (Appendix 5) are enclosed with this submission. The Commission will note that the AASR and NIS Addendum concludes that:

'There are no changes to the findings of the AASR and NIS which accompanied the planning applications for the Proposed Development and the conclusions of these assessment documents remain valid. It can be concluded, in view of best scientific knowledge and based on objective information, that the Proposed Development will not adversely affect the integrity of any European Site.'

6.3 Impact on Bird Species

It is noted that the Inspector's Reports for the appeals raised concerns in relation to the likely effects of the Proposed Project on avifauna taken in conjunction with existing windfarms in the locality.

Bird surveying was recommenced at the proposed Croagh Wind Farm in the intervening period between the submission of the planning application and remittal. The surveys that informed the EIAR as submitted were undertaken between September 2017 and September 2019. The updated surveys were undertaken between November 2023 and September 2025 inclusively. The value in this considerable span of data is the ability to identify trends over time. Additionally, with the increase in volume of data comes an increasing confidence that this data corresponds to a representative sample of the baseline condition.

Twenty-four additional months of bird surveys have been undertaken at the proposed Croagh Wind Farm since submission of the planning application. These surveys followed recognised industry practice guidance as set out in NatureScot (SNH, 2017; revised in NatureScot, 2025) and were undertaken from November 2023 to September 2025 inclusively. We refer the Commission to the enclosed Ornithological Report 2026 (Appendix 7) prepared by MKO which sets out detail of the survey effort undertaken and the associated assessment of same and conclusions. The Commission will note the conclusion of the Ornithological Report 2026 which states the following:

'It has been demonstrated that the Proposed Croagh Wind Farm will not significantly affect bird species of conservation concern individually or in combination with other developments.'

6.4 Visual Impact

It is noted that the Inspector's Reports for the appeals raised concerns in relation to the potential for significant adverse visual impact arising from the proposed project. We refer the Commission to the enclosed 'Landscape and Visual Impact Assessment Response' (LVIAR) prepared by MKO (Appendix 3). The LVIAR considers in detail the concerns raised previously by the Commission's Inspector and concludes the following:

'This document demonstrates that, overall, the Proposed Development is located in favourable landscape for wind energy development and exhibits good wind farm design with limited visual influence. The Proposed Development will not significantly impact on landscape character, tourist destination sites, landscape designations or scenic routes and protected views, and the cumulative effects are predicted to be low in terms of landscape impact and will be acceptable in terms of visual impact.'

6.5 Noise Impacts

It is noted that the Inspector's Reports for the appeals also raised concerns in relation to low frequency noise and amplitude modulation and stated that inadequate mitigation was proposed. In this regard, we refer to the Operational Phase Environmental Noise Response prepared by AWN Consulting and provided as Appendix 4 of the response to a Further Information Request from ACP, submitted in December 2022 for both appeal cases, which concludes:

"The submitted noise impact assessment is robust and has been carried out in line with current standards and best practice guidelines (i.e. Planning Guidelines for Wind Development 2006 and IOA GPG). In addition to these guidelines, discussion has been provided in relation to matters such as Low frequency noise, Infrasound, and Amplitude Modulation. The submitted EIAR Noise and Vibration assessment, as supplemented by the FI responses to Sligo and Leitrim County Councils, demonstrates that the proposed development can operate within the noise criteria derived from the relevant guidance. This document has reiterated the relevant sections of the EIAR to comprehensively address the concerns raised by the F.I. request and confirms the measures which will be implemented in full to ensure any issue will be mitigated in the unlikely event of adverse effects arising as a result of low frequency noise or amplitude modulation."

Further to the above, it is submitted that prior to the commissioning of the wind farm, the developer will submit a Noise Complaint Monitoring Programme (NCMP) to the planning authority for written agreement. The NCMP will include a detailed methodology for noise measurements and procedures for recording results and a protocol for managing complaints In the event of a complaint associated with noise, for example, from tonality or amplitude modulation due to the proposed project, in line with the NCMP documents to be submitted and agreed with the local authority), the operator will fully investigate the complaint in collaboration with the turbine manufacturer, through review of the meteorological periods and conditions.

A Draft Noise Complaint Management Protocol for addressing AM or tonality is presented in Appendix 8. A final version of this protocol will be contained within the NCMP to be agreed the relevant Local Authority and/or Authorities.

7. CONCLUSION

The provision of the Croagh Wind Farm Project is strongly supported by European, 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.

At a European level the Proposed Project is supported by the European Union Renewable Energy Directive and REPowerEU. At a national level, the Proposed Project is supported by the National Planning Framework First Revision, Climate Action Plan 2025, the National Energy Security Framework, among other national climate and renewable energy policies.

Specifically, the Proposed Project is expected to be operational before 2030 and will contribute to achieving the target of generating 9GW of electricity from onshore wind and reducing greenhouse gas emissions by 80% by 2030 as set out in the CAP25. If permitted, the Proposed Project will add approximately 48MW of renewable, clean energy to our national wind energy capacity. This will not only contribute to the decarbonisation of the electricity sector but will play a role in the decarbonisation of other sectors and the transition to a low carbon, climate resilient economy.

The legally binding greenhouse gas emission reduction target and the obligations of public bodies under the Climate Action and Low Carbon Development Act 2015, as amended, should also be considered in the favourable assessment of the Proposed Project. The Proposed Project will provide carbon savings of c.1,655,640 tonnes over the proposed thirty-year lifetime of the wind farm as detailed in Chapter 10 of the submitted EIAR and will directly support the reduction in emissions from the electricity sector and will facilitate emissions reductions across society and all sectors of the economy through the increased supply of renewable energy in the medium-term over the next c. 30 years.

The Proposed Project aligns with National Strategic Outcome 8 and Objectives outlined in the Revised NPF, particularly Objective 70, 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.

At the Regional level, the Proposed Project is supported by policy RPO 4.18 of the NWRA RSES which supports '*the development of secure, reliable and safe supplies of renewable energy'*. The Proposed Project capitalises on the region's potential to become a more prosperous, sustainable, climate resilient and attractive region in line with the overall objective of the RSES by utilising the region's '*unique natural endowment of ample carbon-neutral, energy supplies'* such as wind.

At the local level, the Proposed Project aligns with Strategic Aim No.13 and Strategic Objective No. 8 in the LCDP which support, in principle, the development of renewable energy technologies to achieve a successful transition to a low carbon economy and facilitate economic development. The Proposed Project is supported by policy P-EN-2 of the SCDP which seeks to facilitate the production of energy from renewable sources and secure the maximum potential from wind energy resources within County Sligo. The Proposed Project is also supported by policy SP-CA-1 of the SCDP which seeks, inter alia, to support the implementation of the national Climate Action Plan. The Proposed Project will make a valuable contribution to the achievement of the CAP25 9GW renewables energy generation target.

The submitted EIAR demonstrates that, if consented, the Proposed Project will be capable of being constructed, operated and decommissioned without giving rise to any significant impacts on the environment. The findings and conclusions of the submitted EIAR and AASR and NIS Report remain up-to-date and relevant except where they have been superseded by the updated technical assessments as summarised in Section 5 of this report. The enclosed updated technical assessments verify and support the findings and conclusions of the submitted EIAR and AASR and NIS Report prepared by MKO in 2020 in view of additional survey information and/or up-to-date planning policy or guidelines.

Considering the submitted EIAR and AASR and NIS Report and the enclosed updated technical assessments it is concluded that this report demonstrates that the Proposed Project complies with all pertinent local planning policies contained in the LCDP and SCDP as detailed in Appendix 1 and 2.

To conclude, it is considered that based on the evidence submitted in support of the planning applications together with the evidence provided in this Report and enclosed technical appendices, the Proposed Project is strongly supported by European, national, regional and local planning policy and will contribute to national and local climate and renewable energy targets. The Proposed Project also complies with the legislative requirements outlined in this report. Ultimately, it is submitted that the Proposed Project is in accordance with principles of proper planning and sustainable development and should be granted planning permission owing to the suitability of the site and the urgent need for renewable energy development.

APPENDIX 1 LEITRIM CDP 2023-2029 STATEMENT OF CONSISTENCY

Table A1: Leitrim CDP 2023-2029 Statement of Consistency

Topic	Policy/Objectives	Compliance
Climate Action	**CA POL 1:** To support the implementation of the European, national, regional and local objectives for climate adaptation and mitigation detailed in Section 12.2.2 and Section 12.2.3 of this Plan.	The Proposed Project will provide renewable energy to the national electricity grid, contributing to towards renewable energy targets at a European, National, Regional and Local level, thereby facilitating climate mitigation through reducing carbon emissions.
	CA POL 2: To support the transition of the county towards a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050 by providing for consolidated development forms which facilitate the reduction of energy demand and greenhouse gas (GHG) emissions, and which supports sustainable travel patterns in line with the Core Strategy.	The Proposed Project contributes to the reduction of GHG emissions and supports the transition towards a low-carbon, climate resilient economy. The Proposed Project is therefore in compliance with CA POL 2.
Landscape Character	**LCA POL 1:** To conserve and enhance the high nature conservation value of the Landscape Character Areas in order to create/protect ecologically resilient and varied landscapes.	Chapter 13 Landscape and Visual Impact Assessment of the EIAR concludes that the Proposed Project is deemed to be acceptable from a landscape and visual perspective. There are no designated scenic routes in the LVIA Study Area Photomontages accompanying the Landscape and Visual Assessment and are included in Volume 2 of the EIAR. Further, the enclosed 2026 LVIAR (Appendix 3) details the compliance of the Proposed Project with the updated Leitrim CDP 2023-2029 in terms of landscape and visual policies and objectives, and reports that the location of the Proposed Project is favourable in terms of wind strategy zoning published in the Leitrim CDP 2023-2029 RES.
	LCA POL 2: To protect, enhance and contribute to the physical, visual and scenic character of Co. Leitrim and to preserve its unique landscape character.	
	LCA POL 3: To ensure that landscape sensitivity and the preservation of the uniqueness of a landscape character area (where appropriate) is an important consideration in determining the appropriateness of development uses and proposals in areas of	

	landscape sensitivity, (scenery, nature conservation or archaeology) in conjunction with the siting, design and materials proposed.	The LVIAR identifies that the proposed turbines in Leitrim are appropriately sited being located within an area equivalent to just 1.24% of total county land that is both designated as "Available Area" for wind energy in the LCDP and does not overlap with designated protected landscapes. Overall, the LVIAR demonstrates that, the Proposed Project is located in a favourable landscape for wind energy development and exhibits good wind farm design with limited visual influence. The Proposed Project will not significantly impact on landscape character, tourist destination sites, landscape designations or scenic routes and protected views, and the cumulative effects are predicted to be low in terms of landscape impact and will be acceptable in terms of visual impact.
	LCA POL 5: To require that landscape and visual impact assessments prepared by suitably qualified professionals be submitted with planning applications for development which may have significant impact on landscape character areas of medium or high sensitivity.	A landscape and visual impact assessment is included within the EIAR Chapter 13, prepared by suitably qualified professionals and accompanies the planning application in compliance with LCA POL 5.
	LCA OBJ 2: To ensure that the management of development will have regard to the value of the landscape, its character, importance, sensitivity and capacity to absorb change as outlined in Appendix VII of this Plan - Leitrim Landscape Character Assessment (2020) and its recommendations.	The design and siting of the Proposed Project have been informed with due regard to landscape considerations as set out in the LCDP. The enclosed LVIAR 2026 identifies that the proposed turbines in Leitrim are appropriately sited being located within an area equivalent to just 1.24% of total county land that is both designated as "Available Area" for wind energy in the LCDP and does not overlap with designated protected landscapes The LVIAR 2026 demonstrates that overall, the Proposed Project is appropriately sited and will not significantly impact on landscape character, tourist destination sites, landscape designations or scenic routes and protected views, and the cumulative effects are predicted to be low in terms of landscape impact and will be acceptable in terms of visual impact.

Natural Heritage	**NH POL *5*:** To ensure that development does not have a significant adverse impact on plant, animal or bird species or habitats protected by law, subject to satisfactory mitigation measures.	As described in Chapter 6 of the EIAR, a range of mitigation measures have been prescribed to prevent impacts on receptors via the identified pathways. In addition, habitat enhancement measures for biodiversity are included as part of the Proposed Project. Overall, the EIAR Chapter 6 concludes that the Proposed Project will not have any significant impacts on the ecology of the wider area provided that the Proposed Project is constructed and operated in accordance with the design, best practice and mitigation that is described within the application. Additionally, an Ecological Survey Report and an Ornithological Report has been prepared by MKO which respond to the issues identified by the Commission in their determinations on the previous appeals (ACP Ref: 321866-25 & 321867-25). The Ecological Survey Report (2025) details the results of detailed habitat and mammal surveys undertaken within the Proposed Project site in September 2025 and following a review of the ecological data collected during the additional ecological survey in 2025, it concludes that there will be no changes to the findings or conclusions of the Biodiversity Chapter submitted as part of the planning applications. The Ornithological Report (2026) details the results of twenty-four additional months of bird surveys since submission of the planning application and presents an updated impact assessment which finds that the Proposed Croagh Wind Farm will not significantly affect bird species of conservation concern individually or in combination with other developments.

	NH OBJ 5: To protect the character, appearance and quality of the habitats and semi-natural features in Co. Leitrim such as woodlands, hedgerows, peatlands, wetlands and artificial waterways of historic or ecological importance.	As described in Chapter 6 of the EIAR, a range of mitigation measures have been prescribed to prevent impacts to biodiversity via the identified pathways. In addition, habitat enhancement measures for biodiversity are included as part of the Proposed Project.
Noise Pollution	**NP POL 3:** To have regard to acoustical planning in the planning process to ensure that future developments include provisions to protect the population from the effects of environmental noise in the interests of residential amenity and public health.	Noise impacts are assessed in Chapter 11 of the submitted EIAR, which concludes that the operational phase wind turbine noise impacts arising from the Proposed Project together with proposed noise mitigation measures will not result in a significant impact on any noise sensitive location. As detailed in Section 5.5 of this report, additional mitigation is proposed in response to the Inspector's Reports for the appeals which raised concerns in relation to low frequency noise and amplitude modulation (AM). Prior to the commissioning of the wind farm, the developer will submit a Noise Complaint Monitoring Programme (NCMP) to the planning authority for written agreement. A Draft Noise Complaint Management Protocol for addressing AM or tonality presented in Appendix 8 and a final version of this protocol will be contained within the NCMP to be agreed the relevant Local Authority and/or Authorities.
Air quality	**AQ POL 2:** To promote air quality improvements, where practicable, through a shift to more sustainable modes of transport, reduced use of fossil fuels and a resulting reduction in carbon dioxide emissions.	Air quality impacts are assessed in Chapter 10 of the submitted EIAR. Chapter 10 concludes that there will be no significant direct or indirect effects on air quality due to dust emissions during the construction phase of the Proposed Project. Minor short term or temporary indirect emissions associated with the construction of the Proposed Project include vehicular and dust emissions.

		Chapter 10 also concludes that there will be a significant positive effect on human health due to the operation of the Proposed Project. The production of energy from wind turbines has no direct emissions and harnessing more energy by means of renewable sources will reduce dependency on fossil fuels, thereby resulting in a reduction in harmful emissions that can be damaging to human health and the environment. At decommissioning any impact and consequential effect that occurs are similar to that which occurs during the construction phase, albeit of less impact. The mitigation measures prescribed in Chapter 10 for the construction phase of the Proposed Project will be implemented during the decommissioning phase thereby minimising any potential impacts.
Built Heritage	**BH POL 2:** To promote best conservation principles and practice with regard to protecting Leitrim's considerable architectural heritage.	The Proposed Project has been designed to avoid any archaeological sites and monuments. From all national monuments identified on the site a buffer of at least 30m from the Proposed Wind Farm infrastructure will be maintained. Chapter 14 of the EIAR concludes that no significant direct or indirect impacts on Cultural Heritage and Archaeology.
	BH OBJ 1: To seek the protection of all structures within the county that are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest as contained in the Record of Protected Structures (Volume IV of this Plan).	The Proposed Project has been designed with consideration for the recorded monuments of the area. Mitigation measures are outlined in Chapter 14 of the EIAR to ensure that no impacts arise.
Leitrim County Renewable Energy Strategy	**RE POL 1:** To encourage and facilitate the production of energy from renewable sources, such as from wind, solar, bioenergy, hydroelectricity, and geothermal, subject to compliance with proper planning and environmental considerations.	The Proposed Project in Co. Leitrim will generate c. 38.4 MW of renewable electricity in Co. Leitrim will generate c. 38.4 MW of renewable electricity which will be transferred to the National Grid, thereby contributing to the county's renewable energy generation capacity. The Proposed Project supports the production of energy from renewable sources and will assist in achieving national targets for renewable energy generation and the reduction of greenhouse gas emissions.
	RE POL 2: To promote and support developments and actions that assist in achieving the national targets for energy from renewable resources and reducing greenhouse gas emissions associated with energy production.	

	RE OBJ 1: To seek to achieve a minimum of 200 MW of renewable electricity in the county by 2030, by facilitating renewable energy developments, including micro-generation renewable technologies incorporating solar, wind, hydro-electric and bioenergy.	The Proposed Project in Co. Leitrim will generate c. 38.4 MW of renewable electricity and directly supports Policy objective RE OBJ 1 to generate a minimum of 200 MW of renewable electricity in the county by 2030.
Leitrim County Wind Energy Policies	**WE POL 1:** To acknowledge the importance of wind energy in Co. Leitrim as a renewable energy source which can play a vital role in achieving national targets in relation to reductions in fossil fuel dependency and therefore greenhouse gas emissions	The Proposed Project will increase the level of renewable energy generated, reducing the county's dependence on fossil fuels and thereby GHG emissions.
	WE POL 2 To encourage the development of wind energy in suitable locations and in an environmentally sustainable manner to ensure the security of energy supply, in accordance with Government policy and the Leitrim County Renewable Energy Strategy	The Proposed Project site is located in an area designated as 'Available' and 'Low Risk' for wind energy development with viable wind energy speeds on the wind energy maps (see Figures 6.3 and 6.4 in the LCDP). Therefore, it is submitted that the Proposed Project is in accordance with the proper planning and sustainable development of the area.
	WE POL 3: To ensure that the assessment of wind energy development proposals will have regard to the following: › sensitivities of the county's landscapes › visual impact on protected views, prospects, designated landscapes, as well as local visual impacts › impacts on nature conservation designations, archaeological areas, county geological sites, historic structures, public rights of way and walking routes local environmental impacts, including those on residential properties, such as noise and shadow flicker › visual and environmental impacts of associated development, such as access roads, plant and grid connections from the proposed wind farm to the electricity transmission network › scale, size and layout of the project and any cumulative effects due to other projects › the impact of the Proposed Project on protected bird and mammal species	The assessment of the Proposed Project contained in the EIAR and associated technical appendices has had consideration to all of the matters detailed under WE POL3 and is considered to be in compliance with WE POL3 specifically: • In respect of points 1, 2 and 5, of Policy WE POL3, Chapter 13 Landscape and Visual Impact Assessment of the EIAR concludes that the Proposed Project including associated access roads, plant and grid infrastructure development, is deemed to be acceptable from a landscape and visual perspective. There are no designated scenic routes in the LVIA Study Area. • Further, the enclosed 2026 LVIA Response Report (Appendix 4) outlines the compliance of the Proposed Project with the updated Leitrim CDP 2023-2029 in terms of landscape and visual policies and objectives. Overall, it demonstrates the Proposed Project is located in a favourable landscape for wind energy development and exhibits good wind farm design with limited visual influence. The Proposed Project will not significantly impact on landscape character, tourist destination

		sites, landscape designations or scenic routes and protected views, and the cumulative effects are predicted to be low in terms of landscape impact and will be acceptable in terms of visual impact. • In respect of bullet point 3 of Policy WE POL3, the impact of the Proposed Wind Farm on designated sites is considered in full in the NIS. The NIS objectively concluded that the Proposed Project, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site. The planning application includes an Appropriate Assessment prepared in line with the Birds and Natural Habitats Regulations 2011. Further, as described in Chapter 6 of the EIAR, a range of mitigation measures have been prescribed to prevent impacts to biodiversity via the identified pathways. In addition, habitat enhancement measures for biodiversity are included as part of the Proposed Project. • Further in respect of bullet point 3, the Proposed Project has been designed to avoid any archaeological sites and monuments. From all national monuments identified on the site a buffer of at least 30m from the Proposed Wind Farm infrastructure will be maintained. Chapter 14 of the EIAR concludes that no significant direct or indirect impacts on Cultural Heritage and Archaeology. The Proposed Project has been designed with consideration for the recorded monuments of the area. Mitigation measures are outlined in Chapter 14 of the EIAR to ensure that no impacts arise. • In respect of bullet point 4 of Policy WE POL3, the submitted Noise and Shadow Flicker assessments show that the Proposed Project will not give rise to significant adverse impacts on residential amenity. • In respect of point 6, the layout of the Proposed Project has been designed to minimise the potential environmental effects of the wind farm, while at the same time maximising the energy yield of the wind resource passing over the site. A constraints study, as described in Section 3.6.1 of the EIAR, has been carried out to ensure that turbines and ancillary infrastructure are located in the most appropriate areas of the site. The Proposed Project layout makes maximum use of the existing access roads and tracks within the site.

		• In respect of point 6 of Policy WE POL3, the potential for cumulative impacts arising from other projects has been fully considered within the EIAR and an assessment of cumulative impacts is presented within each technical Chapter (5-14) of the EIAR. Overall, the Proposed Project has been designed to mitigate impacts on the environment. The mitigation measures set out in the EIAR have been developed to ensure that significant cumulative effects do not arise during construction, operational or decommissioning phases of the Proposed Project. It is noted that the 4 no. additional turbines have been permitted as part of the Tullynamoyle Wind Farm project in August 2023 (ACP Ref. PL12.31289). Having considered this additional wind energy project, it is deemed that the conclusions within the EIAR in respect of cumulative effects do not change. • In respect of point 7, as described in Chapter 6 of the EIAR, a range of mitigation measures have been prescribed to prevent impacts to biodiversity via the identified pathways. In addition, habitat enhancement measures for biodiversity are included as part of the Proposed Project. Further, the enclosed 2026 Ecology Report presents the results of detailed habitat and mammal surveys undertaken within the Proposed Project site and concludes that there will be no changes to the findings or conclusions of the EIAR Biodiversity Chapter 6 submitted as part of the planning applications.
	WE POL 6: To have regard to the principles and planning guidance set out in Department of Housing, Planning and Local Government publications relating to 'Wind Energy Development' and the DCCAE Code of Practice for Wind Energy Development in Ireland - Guidelines for Community Engagement and any other relevant guidance which may be issued.	• The Proposed Project adheres to the DoEHLG Guidelines (2006) in its design and has been designed to be capable of adhering with the Draft Guidelines (2019). The EIAR accompanying this application considers all relevant potential environmental impacts that could arise (Chapter 5 of the Guidelines), and the design of the Proposed Project has followed the design principles established in Chapter 6 of the Guidelines.

		• It is expected that, were the Draft Guidelines to come into effect, the Proposed Project will be able to achieve any revised noise and shadow flicker standards. However, without the final, adopted guidelines, the exact compliance procedures cannot be confirmed at this stage. It is important to highlight that the Proposed Project maintains a four times tip height setback between turbines and sensitive receptors, and a thorough community consultation effort has been conducted. • Chapter 2 and Appendix 2-2 (Community Engagement Report) of the submitted EIAR details the community engagement undertaken over 2018-2020 as part of the Proposed Project in compliance with the Code of Practice for Wind Energy Development in Ireland Guidelines for Community Engagement issued by the Department of Communications, Climate Action and Environment (December 2016). In Chapter 3 of the EIAR it confirms that it is the Applicant's intention to adhere to the submitted community report for the lifetime of the development.
	WE OBJ 1: To secure the maximum potential from the wind energy resources of Co. Leitrim commensurate with supporting development that is consistent with proper planning and sustainable development of the area.	The Proposed Project will contribute c. 48MW of wind-generated renewable energy to the National Grid of which c. 38.4 MW will be generated by turbines sited in County Leitrim and will therefore support the optimal harnessing of County Leitrim's wind energy resources.

APPENDIX 2 SLIGO CDP 2024-2030 STATEMENT OF CONSISTENCY

Table A2: Sligo CDP 2024-2030 Statement of Consistency

Topic	Policy/Objectives	Compliance
Climate Action	**SP-CA-1:** Support the implementation of the government's climate action policy in accordance with the Climate Action and Low Carbon Development (Amendment) Act 2021, the national Climate Action Plan 2023, the National Adaptation Framework 2018 and all subsequent relevant updates.	The Proposed Project directly contributes to Ireland's low-carbon, climate-resilient economy, in accordance with the Climate Action and Low Carbon Development (Amendment) Act 2021. Specifically, the Proposed Project will contribute to achieving the target of generating 9GW of electricity from onshore wind and reducing greenhouse gas emissions by 80% by 2030 as set out in the CAP25. If permitted, the Proposed Project will add approximately 48MW of renewable, clean energy to our national wind energy capacity. This will not only contribute to the decarbonisation of the electricity sector but will play a role in the decarbonisation of other sectors and the transition to a low carbon, climate resilient economy in support of the Climate Action and Low Carbon Development Act 2021 targets.
	SP-CA-2: Ensure that Sligo County Council's Climate Adaptation Strategy, Climate Action Plan and County Development Plan are fully aligned.	The Proposed Project supports the objectives of these plans and strategies.
	SP-CA-3: Integrate appropriate climate mitigation and adaptation considerations and measures into all relevant development management.	The Proposed Project presents sufficient climate mitigation measures, through the provision of renewable energy, to reduce overall carbon emissions.
Landscape Character	**P-LCP-1:** Protect the physical landscape, visual and scenic character of County Sligo and seek to preserve the County's landscape character.	Chapter 13 Landscape and Visual Impact Assessment of the EIAR concludes that the Proposed Project including associated access roads,

	Planning applications for developments that have the potential to impact significantly and adversely upon landscape character, especially in Sensitive Rural Landscapes, Visually Vulnerable Areas and along Scenic Routes, may be required to be accompanied by a visual impact assessment using agreed and appropriate viewing points and methods for the assessment.	plant and grid infrastructure development, is deemed to be acceptable from a landscape and visual perspective. There are no designated scenic routes in the LVIA Study Area. Further, the enclosed 2026 LVIA Response Report (Appendix 4) outlines the compliance of the Proposed Project with the updated Leitrim CDP 2023-2029 in terms of landscape and visual policies and objectives. Overall, it demonstrates the Proposed Project is located in a favourable landscape for wind energy development and exhibits good wind farm design with limited visual influence. The Proposed Project will not significantly impact on landscape character, tourist destination sites, landscape designations or scenic routes and protected views, and the cumulative effects are predicted to be low in terms of landscape impact and will be acceptable in terms of visual impact.
	P-LCP-2: Discourage any developments that would be detrimental to the unique visual character of designated Visually Vulnerable Areas.	Chapter 13 Landscape and Visual Impact Assessment of the EIAR evaluates the potential visual effects on the landscape and key viewpoints within the Visually Vulnerable Areas. Overall, it demonstrates the Proposed Project will not significantly impact on landscape character, tourist destination sites, landscape designations or scenic routes and protected views, and the cumulative effects are predicted to be low in terms of landscape impact and will be acceptable in terms of visual impact.
Natural Heritage	**P-BD-1:** Protect, conserve, enhance and sustainably manage the natural heritage, biodiversity, geological heritage, landscape and environment of County Sligo.	As detailed in **Chapter 6** of the EIAR, the Proposed Project has been designed to avoid or mitigate impacts on biodiversity. As described in Chapter 6 of the EIAR, a range of mitigation measures have been prescribed to prevent impacts to biodiversity via the identified pathways. In addition, habitat enhancement measures for biodiversity are included as part of the Proposed Project.

	P-BD-3: Ensure that the ecological impact of all development proposals on habitats and species are appropriately assessed by suitably qualified professionals, in accordance with best practice guidelines, taking full account of the precautionary principle where uncertainty exists.	Chapter 6 of the submitted EIAR assesses the likely significant effects that the Proposed Project may have on Biodiversity, Flora and Fauna which has been prepared by suitably qualified professionals in compliance with P-BD-3. Chapter 6 confirms that the ecological significance of the effects of the Proposed Project has been determined following the precautionary principle and in accordance with the methodology set out in the Guidelines for Ecological Impact Assessment in the UK and Ireland. Terrestrial, Freshwater and Coastal (CIEEM, 2018).
	P-BD-7 Require development proposals on sites of 0.5 ha and over to retain existing high quality ecological features and demonstrate a site-specific biodiversity net gain (BNG), indicating how the approach to development will leave the natural environment in a measurably better state that it was beforehand.	Chapter 6 of the submitted EIAR assesses the potential for the Proposed Project to result in a cumulative loss or deterioration of habitats, or impact on the Key Ecological Receptor species in relation to the existing land uses in the area. Chapter 6 concludes that the Proposed Project will not result in any significant loss of valuable habitats e.g. upland peatland or grassland and the minor loss of peatland habitat that will be affected, will be fully mitigated through habitat enhancement and restoration proposed as part of the Proposed Project. Chapter 6 concludes that the proposed wind farm will not contribute to any overall loss of high value habitat and it has been deliberately designed to be located on habitats of low value for faunal species. Further, the enclosed Ecological Survey Report 2025 details the results of detailed habitat and mammal surveys undertaken within the Proposed Project site in September 2025 and following a review of the ecological data collected during the additional ecological survey in 2025, it concludes that there will be no changes to the findings or conclusions of the submitted EIAR Biodiversity Chapter.

	P-BD-4: Minimise adverse impacts of proposed developments on existing habitats (whether designated or not) by including mitigation and/or compensation measures as appropriate.	**Chapter 6** of the EIAR concludes that the Proposed Project will not give rise to any significant negative impacts on designated sites. As described in Chapter 6 of the EIAR, a range of mitigation measures have been prescribed to prevent impacts to biodiversity via the identified pathways. In addition, habitat enhancement measures for biodiversity are included as part of the Proposed Project. The enclosed Ecological Survey Report 2025 details the results of detailed habitat and mammal surveys undertaken within the Proposed Project site in September 2025 and following a review of the ecological data collected during the additional ecological survey in 2025, it concludes that there will be no changes to the findings or conclusions of the Biodiversity Chapter submitted as part of the planning applications. The enclosed Ornithological Report details the results of twenty-four additional months of bird surveys since submission of the planning application and presents an updated impact assessment which finds that the Proposed Croagh Wind Farm will not significantly affect bird species of conservation concern individually or in combination with other developments.
	P-WHT-1: Protect woodlands, hedgerows and trees from development that would impact adversely upon them. Promote new tree and woodland planting and the enhancement of existing hedgerows by seeking increased coverage, in conjunction with new development using native species of local provenance, where possible.	As indicated in section 4.3.10 of the EIAR the Proposed Project will require 55.1ha of forestry to be felled. The Proposed Project will require forestry replanting, replacing trees on a hectare for hectare basis as a condition of a felling license.
Built Heritage	**P-AH-1:** Protect, manage, and enhance archaeological sites, monuments and landscapes, underwater archaeology (including protected wrecks), historic burial grounds (including their setting, appreciation and visual amenity) listed in the Record of Monuments and Places (RMP), Sites and Monuments Record (SMR), the Register of Historic Monuments, and any additional newly discovered archaeological sites and/or sub-surface archaeological remains. This	The Proposed Project has been designed to avoid any archaeological sites and monuments. From all national monuments identified on the site a buffer of at least 30m from the Proposed Wind Farm infrastructure will be maintained. Chapter 14 of the EIAR concludes that no significant direct or indirect impacts on Cultural Heritage and Archaeology.

	shall be done in accordance with conservation principles and best practice guidelines	
Air Quality	**Section 33.2.9 Air and Noise :** The Council promotes the preservation of best ambient air quality compatible with sustainable development in accordance with the EU Ambient Air Quality and Cleaner Air for Europe (CAFE) Directive (2008/5/0/EC) and will ensure that all air emissions associated with new developments are within Environmental Quality Standards as out in the Air Quality Standards Regulations 2011 (SI No. 180 of 201) (or any updated/superseding documents).	Air quality impacts are assessed in Chapter 10 of the submitted EIAR. Chapter 10 concludes that there will be no significant direct or indirect effects on air quality due to dust emissions during the construction phase of the Proposed Project. Minor short term or temporary indirect emissions associated with the construction of the Proposed Project include vehicular and dust emissions. Chapter 10 also concludes that there will be a significant positive effect on human health due to the operation of the Proposed Project. The production of energy from wind turbines has no direct emissions and harnessing more energy by means of renewable sources will reduce dependency on fossil fuels, thereby resulting in a reduction in harmful emissions that can be damaging to human health and the environment. At decommissioning any impact and consequential effect that occurs are similar to that which occurs during the construction phase, albeit of less impact. The mitigation measures prescribed in Chapter 10 for the construction phase of the Proposed Project will be implemented during the decommissioning phase thereby minimising any potential impacts.
Noise Pollution	**33.2.9 Air and Noise:** Sligo County Council supports the implementation of the Noise Directive 2002/49/EC and associated Environmental Noise Regulations 2006 and will seek to minimise noise disturbance by implementing the Sligo Noise Action Plan 2018 (and all updates thereafter), including provisions relating to the design and operation of developments and associated relevant noise management standards and guidance.	Noise impacts are assessed in Chapter 11 of the submitted EIAR, which concludes that the operational phase wind turbine noise impacts arising from the Proposed Project together with proposed noise mitigation measures will not result in a significant impact on any noise sensitive location. As detailed in Section 5.5 of this report, additional mitigation is proposed in response to the Inspector's Reports for the appeals which raised concerns in relation to low frequency noise and amplitude modulation (AM). Prior to the commissioning of the wind farm, the developer will submit a Noise Complaint Monitoring Programme (NCMP) to the planning authority for written agreement. A Draft Noise Complaint Management Protocol for addressing AM or tonality presented in

		Appendix X and a final version of this protocol will be contained within the NCMP to be agreed the relevant Local Authority and/or Authorities.
Energy and Telecommunications	**P-EN-1:** Support the sustainable development, upgrading and maintenance of energy generation, transmission, storage and distribution infrastructure, to ensure the security of energy supply and provide for future needs, as well as protection of the landscape, natural, archaeological and built heritage, and residential amenity	The Proposed Project is aligned with policy P-EN-1 which directly support the sustainable development of renewable energy generation. The Proposed Project in Co Sligo will add 9.6MW worth of renewable energy to the National Grid.
	P-EN-2: Facilitate the production of energy from renewable sources and secure the maximum potential from wind energy resources within County Sligo, including the augmentation, upgrading and improvements to existing wind farms, subject to strict location, siting and design criteria.	As noted above, the Proposed Project located in Co Sligo will add 9.6MW worth of renewable energy to the National Grid, maximising the wind energy resource within Co Sligo following all appropriate location, siting and design criteria. The layout of the Proposed Project has been designed to minimise the potential environmental effects of the wind farm, while at the same time maximising the energy yield of the wind resource passing over the site. A constraints study, as described in Section 3.6.1 of the EIAR, has been carried out to ensure that turbines and ancillary infrastructure are located in the most appropriate areas of the site.

