
MOANMORE LOWER GREEN ENERGY LIMITED

PROPOSED WIND FARM DEVELOPMENT AT MOANMORE LOWER, KILRUSH, CO. CLARE

PLANNING STATEMENT

April 2025

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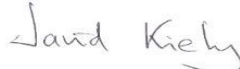


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1 INTRODUCTION AND BACKGROUND TO THE PLANNING APPLICATION

1.1 Introduction

Jennings O'Donovan & Partners Limited, Consulting Engineers, have prepared this Planning Statement ("the Statement") on behalf of Moanmore Lower Green Energy (The Applicant) to accompany the application ("the Application") to Clare County Council ("the Planning Authority") for planning permission for works associated with the proposed Moanmore Lower Wind Farm, Co. Clare.

The purpose of this Planning Statement is to outline the background to the development, the key elements of the proposal and to demonstrate that the Proposed Development complies with all relevant planning policy and is in accordance with the proper planning and sustainable development of the area.

This statement provides a comprehensive assessment of the Proposed Development's consistency with the relevant planning policy documents at European, national, regional and local levels.

This planning application for the Proposed Development is being submitted to Clare County Council under the provisions of Section 34 of the Planning and Development Act 2000, as amended ("the Act").

1.2 Statement of Authority

This Planning Statement has been prepared by Breena Coyle and David Kiely of Jennings O'Donovan & Partners Limited.

Breena Coyle, Senior Town Planner in Jennings O'Donovan & Partners Limited (JOD), has a Masters in Environment Planning from Queens University and has over 15 years' experience in Environmental Planning throughout Ireland and the UK. She has a clear understanding of the legislative framework and has experience in the development of windfarms from the pre-planning process through to construction.

David Kiely, Director of Jennings O'Donovan & Partners Limited, holds a BE in Civil Engineering from University College Dublin and MSc in Environmental Protection from IT Sligo. He is a Fellow of Engineers Ireland, a Chartered Member of the Institution of Civil Engineers (UK) and has over 41 years' experience. He has extensive experience in the preparation of EIAR and EIS for environmental projects including Wind Farms, Solar Farms, wastewater projects, quarries and various commercial developments. David has also been involved in the construction of over 50 wind farms since 1997.

1.3 **The Applicant**

The Applicant – Moanmore Lower Green Energy Ltd, is a subsidiary of Greensource Sustainable Developments Limited (Greensource Ltd.).

Greensource is an innovative Irish renewable energy company based in Aclare, Co. Limerick that specialises in the development of renewable energy projects, working with communities from pre-planning to operation, and creating long-lasting local partnerships. Greensource has over ten years development and operational experience. Greensource has a highly skilled and experienced team who are committed to developing projects with successful outcomes for all stakeholders. Working with integrity and care for the local environment, the team has a strong track record, having successfully completed wind energy and other renewable projects in the west of Ireland.

1.4 **Site Location and Context**

The Wind Farm Site boundary area extends to approximately 26.84ha all of which is owned by private third-party landowners. The Redline Boundary extends to 36.77ha. The Wind Farm Site is characterised by a combination of agricultural grassland and cutover peatland bog. The wind farm Site is located within the townland Moanmore Lower.

The Wind Farm Site is located 3km north-west of Kilrush, Co. Clare, 6.8km south-west of Cooraclare village, and 7.1km north of the county boundary between counties Clare and Kerry. The Site is located on relatively level ground, at elevations ranging from 11m AOD in the northern side of the Site, where the site access track is proposed, to 9m AOD towards the middle of the Site. A Site Location Map showing the Redline Boundary is appended as **Figure 1.1** and a map which comprises of all elements of the Project is outlined as **Figure 1.2a** and **b**. Is in an area designated '**Open to Consideration**' in the Clare County Development Plan (CDP) 2023-2029.

The townlands through which the proposed Grid Connection will transect include the townlands of Moanmore Lower, Moanmore South, and Tullabrack.

Vertical realignment works will be undertaken on a small section of the L6132 (0.028ha). These works are located in the townland of Gower South.

Construction of a new site entrance with access onto the adjoining local road network (L6132) and the Blade Transfer Area are located in the townland of Tullabrack East and the site is (3.85ha).

Temporary works will be required at intervals on the L2036 to accommodate the delivery of the turbine components and HGV vehicles. These temporary works are included as part of this application and are located in the townlands of Moanmore South, Tullabrack and Tullabrack West.

The redline boundary extends to approximately 36.77ha. The general area of the wind farm site is comprised of agricultural grassland used for livestock grazing and cutover peatland and is in the ownership of 4 local landowners. Any required landowner consent will be submitted with the planning application.

There are 183 receptors within a 2km radius of the proposed turbines which includes 181 houses, comprising one off houses and farm holdings, 1 No. school and an old cottage which has been converted to a tack-room. A minimum separation distance of 600m from all occupied sensitive receptors has been achieved with the Project design.

1.5 Planning History

There are four previous planning applications located within the site as detailed in Table 1.1. Only one planning application is still active and under appeal with An Bord Pleanála (Planning Ref: 2460143) within the proposed red line boundary. This planning application for a 4no. wind turbine development including ancillary works was refused by Clare County Council on 23rd May 2024. This decision has been appealed to An Bord Pleanála. The proposed Turbine Delivery Route and The Blade Transfer Area are the same for the proposed Development and the proposed Ballykett Wind Farm.

Table 1.1 Planning History of the Site

Planning Reference Number	Date of Submission	Permission Type	Description	Status
98150	12/02/1998	Outline Permission	erection of a wind farm on the land of Mr. Charles Cullinane. The proposed development consists of eighteen wind turbines with associated roads, control-room and electrical compound.	Closed No Decision
00952	08/05/2000	Permission	to erect a wind farm comprising of 7 no. 1800 kw Wind Turbines including 7 no. transformer stations	Permission Granted and Development Constructed
2360143	20/06/2023	Permission	The Development will consist of the erection of 4 no. wind turbines with an overall ground to blade tip height of 150m with a rotor diameter of 136m and a hub height of 82m. The development will also consist of the construction of crane hardstand areas and turbine foundations, new site entrance onto the L6132, construction of one no. temporary construction compound with associated temporary site offices, parking areas and security fencing, installation of one no. permanent meteorological mast of 82m overall height, construction of new internal site access tracks and upgrade of existing site track, to include all associated drainage including new clear span bridge crossing of the Moyasta River, development of a site drainage network, biodiversity enhancement measures, construction of one no. permanent electrical substation, ancillary forestry felling to facilitate construction of the Development, all associated underground electrical and communications cabling connecting the wind turbines to the wind farm substation and to the existing Tullabrack 110kV Substation.	Refused by Clare County Council
2460143	29/03/2024	Permission	The erection of 4 no. wind turbines with an overall ground to blade tip height of 150m with a rotor diameter of 136m and a hub height of 82m, the construction of crane hardstand areas	Refused by Clare County Council and

Planning Reference Number	Date of Submission	Permission Type	Description	Status
			and turbine foundations, the creation of a new site entrance onto the L6132, construction of 1 no. temporary construction compound with associated temporary site offices, parking areas and security fencing, installation of 1 no. permanent meteorological mast of 82m overall height, construction of new internal site access tracks and upgrade of existing site track, to include all associated drainage including new clear span bridge crossing of the Moyasta River, development of a site drainage network, biodiversity enhancement measures, construction of 1 no. permanent 38kV electrical substation, 2 no. permanent spoil storage areas, all associated underground electrical and communications cabling connecting the wind turbines to the wind farm substation and to the existing Tullabrack 110kV Substation, all ancillary forestry felling to facilitate construction including the development of one no. borrow pit, vertical realignment of an existing crest curve on the L6132. This application is seeking a ten year permission and a 35 year operational life from the date of commissioning of the wind farm.	is currently under appeal to An Bord Pleanála (ABP-319961-24)

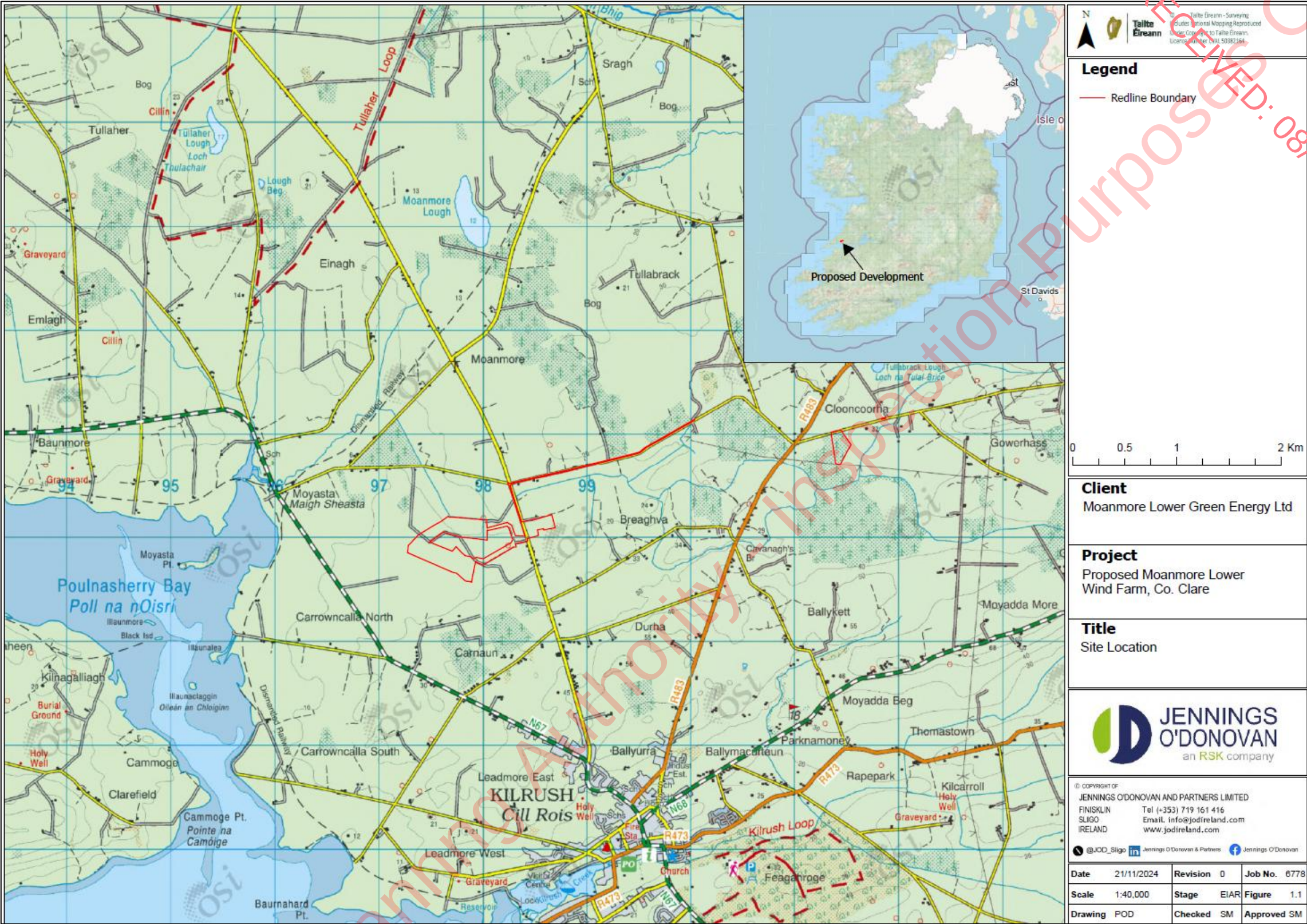


Figure 1.1: Site Location Map

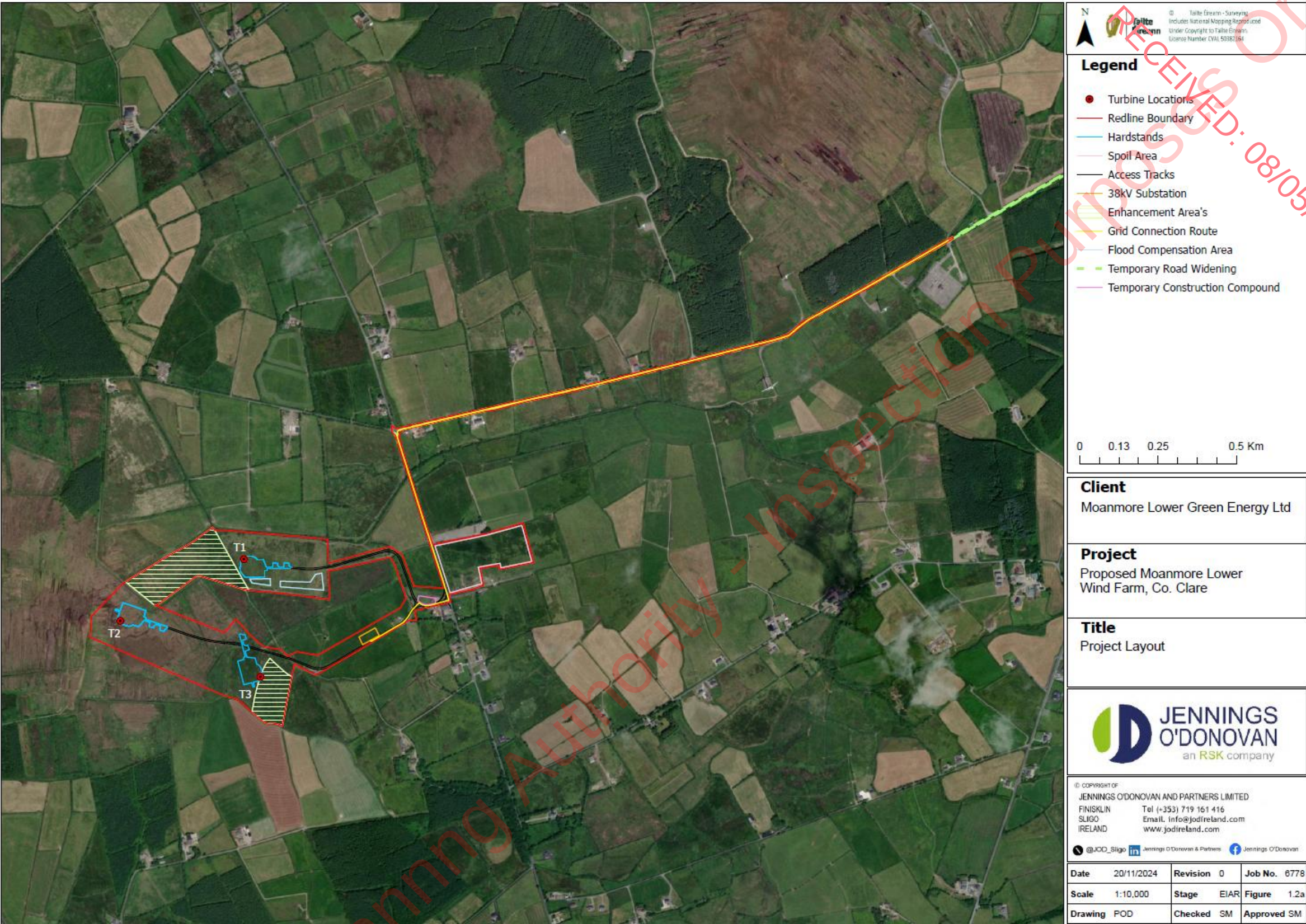


Figure 1.2a: Project Layout

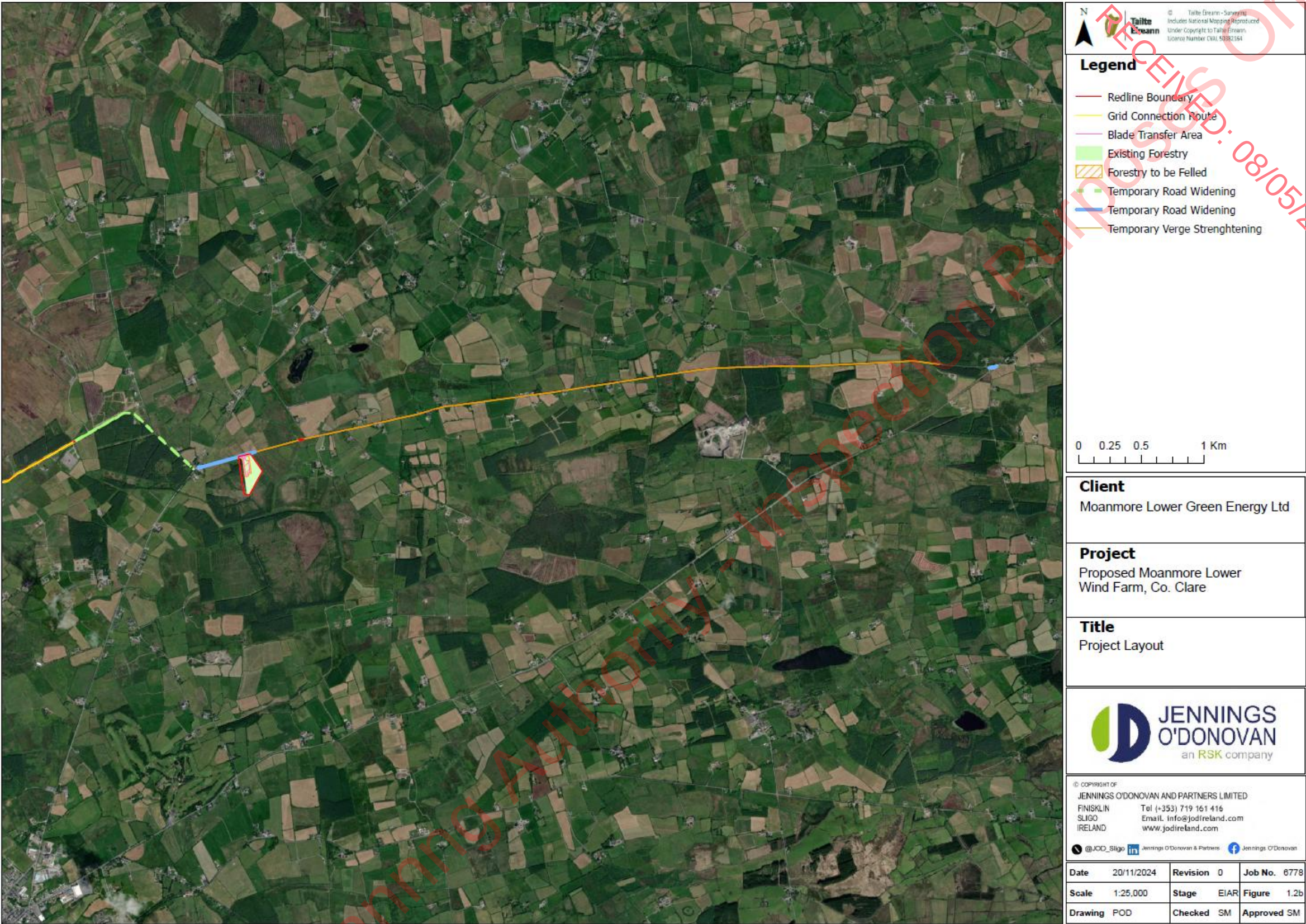


Figure 1.2b: Project Layout

2 **PROPOSED DEVELOPMENT**

The Development will include the following main components:

- erection of 3 no. wind turbines with an overall ground to blade tip height of 150m, with a rotor diameter of 136m and a hub height of 82m and a total generating capacity of 15MW,
- construction of turbine hardstand areas and turbine foundations,
- construction of new internal site access tracks and upgrade of existing site track, to include all associated site drainage,
- construction of 1. no new site entrance along the turbine delivery route with access onto the adjoining local road network (L6132),
- construction of 1 no. temporary construction compound with associated temporary site offices, parking areas and security fencing,
- development of a site drainage network,
- construction of 1 no. 38kV electrical substation with all associated electrical plant and equipment, security fencing, lightening protection, security cameras and gates, and all ancillary structures and works,
- 1 no. permanent spoil storage area,
- all wind farm internal cabling connecting the wind turbines to the electrical substation,
- all works associated with the permanent connection of the wind farm to the national electricity grid comprising a 38kV underground cable in permanent cable ducts from the proposed, permanent, on-site substation and to the existing Tullabrack 110kV ESBN Substation,
- 2 no. flood compensation areas,
- vertical realignment of an existing crest curve on the L6132 local road in order to prevent grounding of abnormal load vehicles during delivery of turbine components,
- ancillary forestry felling to facilitate construction and operation of the development,
- construction of a blade transfer area off the L6132,
- provision of 2 no. biodiversity enhancement areas,
- upgrade of an existing site entrance onto the adjoining local road network (L2034) including the demolition of an existing wall and removal of hedgerow at the site entrance to facilitate abnormal load vehicles during delivery of turbine components and reconstruction of same wall and replanting of hedgerow,
- Landscaping and all associated ancillary works.

A 10-year planning permission and 40-year operational life from the date of commissioning of the entire wind farm is being sought. However, part of the substation and all of the grid connection will be handed over to ESB networks to own and operate. As part of the national

grid infrastructure, their life can extend beyond the life of the wind farm. Accordingly, permission is sought for the grid connection and substation in perpetuity.

The EIAR assesses the Project which includes the Development as outlined above; it includes improvements and temporary modifications to the existing public road infrastructure to facilitate delivery of abnormal loads and turbine delivery.

3 KEY PLANNING CONSIDERATIONS

This section outlines the need for the Proposed Development based on international, National and regional policy and guidance and an assessment of the need to implement legally binding national climate change targets by encouraging appropriate renewable energy development throughout Ireland.

3.1 The Climate Emergency

In April 2022, the Intergovernmental Panel on Climate Change (IPCC): made up of scientists from around the world, which provides regular assessments on the scientific basis of climate change, its impacts and future risks, released their AR6 report¹. The report shows the widespread, dangerous disruptions caused by climate change in nature and shows how billions of people's lives are being impacted. It outlines how countries are falling behind on policies and actions needed to limit global temperature increases and achieve net zero emissions. Reducing carbon emissions by phasing out fossil fuels is stated as being urgently needed. Throughout the report, renewable energy such as wind is highlighted as an adaptation to displace fossil fuels and so reduce emissions and mitigate climate effects. Renewable energy is also credited with benefits such as improving air quality, reducing the cost of electricity, improving wealth and development and increasing energy security.

The Environmental Protection Agency² highlights that human activity has led to widespread and rapid changes in all components of the global climate system with recent extreme events in Ireland highlighting the vulnerability of individuals, communities, sectors and ecosystems to climate change and indicate an adaptation deficit.

On 29th November 2019 the European Parliament declared a climate emergency ahead of the UN COP 25 in Madrid in December 2019. In May 2019 the Oireachtas declared a

¹IPCC. (2022) AR6. <https://www.ipcc.ch/assessment-report/ar6/> Accessed 20/12/2024

² EPA (2024). Ireland's Climate Change Assessment Synthesis Report <https://www.epa.ie/publications/monitoring--assessment/climate-change/irelands-climate-change-assessment-synthesis-report.php>

“climate emergency” in an amendment to the report ‘*Climate Action: A cross-party consensus for action*’ which followed the recommendations of the Citizens Assembly on Climate Action. There then followed the publication of the Cross-Departmental Climate Action Plan 2019 on 17th June 2019, this was revised in 2021, 2023 and 2024. The Climate Action Plan 2024 and 2025 reflects the accepted wisdom that decisive and urgent action is required to arrest the acceleration of greenhouse gas emissions within the limited window of opportunity that remains. The Plan includes a commitment to make Ireland 100% carbon neutral by 2050. It includes increased renewable electricity targets and reduction in reliance of fossil fuels and supporting the growth of private electric vehicles and meeting 80% of electricity demand, from renewable sources, all by 2030. Among the most important measures in the CAP2024 and CAP 2025 is a target of 9GW from onshore wind, by 2030. In 2023, installed onshore wind capacity in Ireland reached 4.78GW³. This leaves a short fall of 4.2GW to be achieved in 7 years.

Therefore, in light of the climate emergency and legally binding targets related to emissions reductions there is a clear necessity, and it is of urgent national importance to increase the amount of energy from renewable sources, especially onshore wind, which is capable of being deployed in the near term. The Proposed Development is anticipated to have the capacity to generate between 12-15MW towards these targets, helping to mitigate the effects of the climate emergency.

3.2 **International Policy Context**

International energy policy is based on the demand to battle climate change and reduce carbon dioxide (CO₂) emissions and, therefore, is relevant to renewable energy development.

3.2.1 ***United Nations Framework Convention on Climate Change***

The United Nations Framework Convention on Climate Change (UNFCCC)⁴ implemented by the United Nations in May 1992, determined a long-term objective to lessen greenhouse gases in the atmosphere, with the purpose of preventing anthropogenic interference with the climatic system. The UNFCCC recognises that the climate system is a shared resource whose stability can be affected by industrial and other emissions of carbon dioxide and other greenhouse gases. The convention enjoys near universal membership, with 197 countries listed as being Parties to the Convention.

³ Statista (2023). Onshore wind energy capacity in Ireland 2008-2023. Available [here](#). Accessed 18/12/2024.

⁴ The United Nations Framework Convention on Climate Change (UNFCCC) (1992). <http://unfccc.int/resource/docs/convkp/conveng.pdf> Accessed 18/12/2024

The Proposed Development, by producing renewable energy, which will displace heavily polluting fossil fuels, is in line with the UNFCCC in relation to emissions reductions.

3.2.2 The Kyoto Protocol

The Kyoto Protocol came into effect in 2005, as a result of which, emissions reduction targets agreed by developed countries, including Ireland, are now binding. Under the Kyoto Protocol, the EU agreed to achieve a significant reduction in total greenhouse gas emissions of 8% below 1990 levels in the period 2008 to 2012. Ireland's contribution to the EU commitment for the period 2008 – 2012 was to limit its greenhouse gas emissions to no more than 13% above 1990 levels.

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

- New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from 1 January 2013 to 31 December 2020;
- A revised list of greenhouse gases ("GHG") to be reported on by Parties in the second commitment period; and
- Amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period.

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

The Proposed Development, by producing renewable energy, which will displace heavily polluting fossil fuels, is in line the Kyoto Protocol and the Doha Amendment in relation to emissions reductions.

3.2.3 The Paris Agreement

The Paris Agreement is a legally binding international treaty on climate change. It was adopted by 196 Parties at COP 21 in Paris, on 12 December 2015 and entered into force on 4 November 2016. It seeks to accelerate and intensify the actions and investment needed for a sustainable low carbon future. Its central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century

well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. The Agreement also aims to strengthen the ability of countries to deal with the impacts of climate change. Ireland is bound by Article 7 of the United Nations COP21 Paris Agreement, to prepare and submit periodic updates on its national adaptation and mitigation plans in the global effort to keep global warming below 1.5°C (Nationally Determined Contributions). (See section 3.4 National Policy).

Out of 196 Parties that have ratified the Paris Agreement, 90% mentioned renewables and roughly 70% included quantifiable energy targets in their initial Nationally Determined Contributions. However, a report by the International Energy Agency⁵ cautions that renewables growth will still need to double to reach the Paris Agreement goal of achieving net-zero emissions by 2050. The International Renewable Energy Agency (IRENA), in a report⁶ on the Nationally Determined Contributions relating to renewable energy also note that even with the renewable energy pledges in the 2021 Paris agreement the 1.5°C goal will still be exceeded before the end of the century.

Ireland is one of the 196 parties to the Paris agreement. Europe's planned emission reductions in line with the Paris Agreement are set out in part under the Effort Sharing Regulation (2023/857). Under this regulation, Ireland is obliged to reduce GHG emissions by 42% in relation to 2005 levels.

The Proposed Development, by producing renewable energy, which will displace heavily polluting fossil fuels, is in line with the Paris Agreement in relation to emissions reductions to keep global warming below 1.5°C.

3.3 European Policy Context

The European Union's (EU) energy policy is based on the principles of decarbonisation, competitiveness, security of supply and sustainability. Its objectives include ensuring the functioning of the energy market and a secure energy supply within the EU, as well as promoting energy efficiency and savings, the development of renewable energies and the interconnection of energy networks⁷.

⁵ IEA. (2021) Renewables 2021 <https://www.iea.org/reports/renewables-2021> Accessed 18/12/2024

⁶ IRENA. (2021) https://www.irena.org/-/media/Files/IRENA/Agency/Publication/2022/Jan/IRENA_NDCs_RE_Targets_2022.pdf Accessed 18/12/2024

⁷ European Parliament. Energy policy: general principles. <https://www.europarl.europa.eu/factsheets/en/sheet/68/energy-policy-general-principles>. Accessed 20/12/2024.

The EU will be climate neutral by 2050. To do this, it will carry out a series of initiatives that will protect the environment and boost the green economy⁸.

In line with this broad outline of European Policy, the Proposed Development by producing additional renewable energy to the Irish electric system, contributes to secure energy supplies. The provision of energy storage also improves the reliability of the supply. The generation of renewable energy also helps to lower Ireland's dependency on fossil fuels.

3.3.1 **Renewable Energy Directive**

The EU passed the Renewable Energy Directive (REDI) 2009/28/EC, revised in 2018 and 2023, to make the EU a global leader in renewable energy and ensure that the target of the final energy consumption for the current RED III is achieved.

In 2023, the European Union (EU) adopted an amendment of the Renewable Energy Directive, which is referred to as "RED III". RED III obliges Member States to collectively ensure the share of renewable energy in the European Union's gross final energy consumption is at least 42.5% by 2030, with an additional 2.5% indicative top-up to allow the target of 45% to be achieved.

RED III also places the presumption of overriding public interest for renewable energy projects (IROPI) on a permanent footing. Article 16f states that Member States must ensure that in the permit-granting procedure, the planning, construction and operation of renewable energy plants, their connection to the grid, the grid itself and storage assets are assumed to be IROPI.

Most notably, RED III obliges Member States to speed up and simplify renewable infrastructure permitting procedures by ensuring that procedures for granting permits to build, repower and operate energy assets do not exceed certain timelines, depending on the asset type, size and location. We expect that this will accordingly speed up development and transaction timelines. Furthermore, Article 16b(1) provides that the permit-granting procedure for onshore renewable energy projects outside renewables acceleration areas must not exceed two years.

The transposition deadline for these provisions was 1 July 2024. An infringement notice has been served on Ireland in respect of its failure to meet this deadline.

⁸European Commission. https://climate.ec.europa.eu/eu-action/climate-strategies-targets/2050-long-term-strategy_en Accessed 20/12/2024

3.3.2 REPowerEU plan

In May 2022, the commission published The REPowerEU Plan⁹ which puts forwards a set of actions to:

- Save energy;
- Diversify supplies;
- Quickly substitute fossil fuels by accelerating Europe's clean energy transition;
- Smartly combine investments and reforms.

It notes that:

"Slow and complex permitting processes are a key obstacle to unleashing the renewables revolution and for the competitiveness of the renewable energy industry"

The REPowerEU plan also states: *"Lengthy administrative procedures are one of the key barriers for investments in renewables and their related infrastructure. These barriers include the complexity of the applicable rules for site selection and administrative authorisations for projects, the complexity and duration of the assessment of the environmental impacts of the projects, grid connection issues, constraints on adapting technology specifications during the permit-granting procedure, or staffing issues of the permit-granting authorities or grid operators. In order to accelerate the pace of deployment of renewable energy projects it is necessary to adopt rules which would simplify and shorten permit-granting processes."*

In 2021 the EU reached a 22.8%¹⁰ share of its gross final energy consumption from renewable sources which leaves a long way to go to reach this increased target.

In accordance with the REPowerEU Communication in May 2022, the Commission published a recommendation¹¹ on speeding up permit-granting procedures for renewable energy projects, accompanied by guidance to help the Member States speed up permitting for renewable energy plants.

The recommendation was created in order to help Member States exploit all possibilities for acceleration that exist within the legislative framework. It proposes measures to streamline

⁹European Commission. (2022) https://eur-lex.europa.eu/resource.html?uri=cellar:fc930f14-d7ae-11ec-a95f-01aa75ed71a1_0001_02/DOC_1&format=PDF Accessed 18/12/2024

¹⁰ European Commission. (2023). https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Renewable_energy_statistics#Share_of_renewable_energy_more_than_doubled_between_2004_and_2020 Accessed 20/12/2024

¹¹EU. [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=PI_COM:C\(2022\)3219&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=PI_COM:C(2022)3219&from=EN) Accessed 20/12/2024

procedures at national level, addresses ambiguities in the application of EU legislation and sets out good practices in Member States. It recommends participatory approaches that involve local and regional authorities and providing authorities with the necessary resources so as to facilitate the timely realisation of locally adapted investments.

Recommendations include:

*"Member States should ensure that the planning, construction and operation of plants for the production of energy from renewable sources, their connection to the electricity, gas and heat grid and the related grid itself and storage assets **qualify for the most favourable procedure available in their planning and permit-granting procedures** and are **presumed as being in the overriding public interest** and in the **interest of public safety**, in view of the legislative proposal amending and strengthening the provisions of Directive (EU) 2018/2001 related to administrative procedures and without prejudice to the Union law."*

"Member States should establish clearly defined, accelerated and as short as possible deadlines for all the steps required for the granting of permits to build and operate renewable energy projects, specifying the instances where such deadlines may be extended and under which circumstances. Member States should establish binding maximum deadlines for all relevant stages of the environmental impact assessment procedure."

The Proposed Development, by producing renewable energy, supports the REPowerEU Plan, helping the EU to secure energy supplies, reach the increased renewable energy target and assisting in the clean energy transition.

3.3.3 Council Regulation (EU) 2022/2577 as amended by Regulation (EU) 2024/223

On 22nd December 2022 Council Regulation (EU) 2022/2577 laying down a framework to accelerate the deployment of renewable energy was published. It outlines that renewable energy plants, including wind energy, are crucial to fight climate change and pollution, reduce energy prices, decrease the Union's dependence on fossil fuels and ensure the Union's security of supply. The aim of the regulation is to eliminate bottlenecks in new permitting procedures. It notes that considering renewable energy projects as being presumed of overriding public interest and serving public health and safety would allow new projects to benefit from a simplified assessment for specific derogations foreseen in the relevant Union environmental legislation with immediate effect.

The first recital states:

“A fast deployment of renewable energy sources can help to mitigate the effects of the current energy crisis, by forming a defence against Russia’s actions. Renewable energy can significantly contribute to counter Russia’s weaponisation of energy by strengthening the Union’s security of supply, reducing volatility in the market and lowering energy prices.”

This regulation was amended by Council Regulation (EU) 2024/223, extending the period of its application to 30 June 2025.

The Emergency Regulation 2022/2577 as amended by Regulation (EU) 2024/223 and the overriding public interest being given to renewable energy projects, further supports additional renewable energy projects, such as the Development. The Proposed Development should be considered in the overriding public interest, as set out under Regulation 2022/2577 as amended.

3.3.4 European Green Deal and European Climate Law

The European Green Deal (presented in 2019) is a package of policy initiatives, which aims to set the EU on the path to a green transition, with the ultimate goal of reaching climate neutrality by 2050. It supports the transformation of the EU into a fair and prosperous society with a modern and competitive economy. The European Green Deal will transform the EU into a modern, resource-efficient and competitive economy, ensuring:

- no net emissions of greenhouse gases by 2050
- economic growth decoupled from resource use
- no person and no place left behind

It focuses on 3 key principles for the clean energy transition, which will help reduce greenhouse gas emissions and enhance the quality of life of our citizens:

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

The European Climate Law writes into law the goal set out in the European Green Deal for Europe’s economy and society to become climate-neutral by 2050¹². The law also sets the

¹² European Commission. European Climate Law. https://climate.ec.europa.eu/eu-action/european-climate-law_en. Accessed 06/11/2024.

intermediate target of reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels.

The Proposed Development, by producing renewable energy, is in line with the European Green Deal and European Climate Law, helping the EU to reach the goal of no net emissions by 2050. The provision of energy storage also assists in maximising the energy output of the wind farm, improving its energy efficiency.

3.4 National Policy Context

The EU Governance of the Energy Union and Climate Action Regulation 2018/1999 as amended requires Member States to develop integrated National Energy and Climate Plans (NECP) to cover:

1. Security, Solidarity and Trust – Working closely with Member States to diversify Europe's sources of energy and ensure energy security.
 2. A fully-integrated internal energy market – Energy should flow freely across the EU, without technical or regulatory barriers. This would enable energy providers to compete freely and promote renewable energy while providing the best energy prices.
 3. Energy Efficiency – Improving energy efficiency to reduce the EU's dependence on energy imports, cut emissions and drive jobs and growth.
 4. Decarbonisation – Putting in place policies and legislation to cut emissions, moving towards a low-carbon economy and fulfilling the EU's commitments to the Paris Agreement on climate change.
 5. Research, Innovation and Competitiveness – Supporting research and innovation in low-carbon and clean energy technologies which can boost the EU's competitiveness.
- Ireland's NECP is discussed in Section 3.4.6.

3.4.1 Climate Act

The Climate Action and Low Carbon Development Act 2015, as amended by the Climate Action and Low Carbon Development (Amendment) Act 2021 commits Ireland to reach a legally binding target of net-zero greenhouse gas emissions no later than 2050, and a cut of 51% by 2030 (compared to 2018 levels).

It establishes a framework with clear, legally binding targets and commitments, and ensures the necessary structures and processes are embedded on a statutory basis to achieve our national, EU and international climate goals and obligations in the near and long term.

When exercising its decision-making powers under the Planning Act, planning authorities and An Bord Pleanála are obliged under s. 15 of the Climate Act to:

“in so far as practicable, perform its functions in a manner consistent with—

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

The Act includes the following key elements:

- Places on a statutory basis a 'national climate objective', which commits Ireland to pursue and achieve no later than 2050, the transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy.
- Embeds the process of carbon budgeting into law, Government are required to adopt a series of economy-wide five-year carbon budgets, including sectoral targets for each relevant sector, on a rolling 15-year basis, starting in 2021.
- Actions for each sector will be detailed in the Climate Action Plan, updated annually.
- A National Long Term Climate Action Strategy will be prepared every five years.

The Proposed Development is anticipated to have the capacity to generate between 12-15MW and will contribute towards Ireland's legally binding targets in the Climate Action and Low Carbon Development Act to reduce greenhouse gas emissions 51% by 2030.

3.4.2 The Climate Action Plan 2025

The Climate Action Plan 2025¹³ (CAP2025) was published in April 2025 and is the latest assessment and measurement of what has been achieved over the past year, building on actions taken in 2024. It sets out what need to be done in 2025 so Ireland is prepared to take on the challenges of our second carbon budget period 2026-2030.

Ireland's Progress to date:

- in 2023 emissions reduced by nearly 7%

¹³Government of Ireland. (2025). Climate Action Plan 2025

https://assets.gov.ie/static/documents/Climate_Action_Plan_2025_updated_cover.pdf [Accessed 22/04/2025]

- emissions in the first half of 2024 were down over 17%
- compared with the same period in 2023, emissions in the first half of 2024 reduced by 3.5%
- Irish wind farms generated nearly 40% of Ireland's total electricity demand in the first half of 2024
- over the past year, emissions in agriculture have reduced by over 4%
- in the built environment, emissions have decreased by 21% since 2018
- in transport, emissions increased by 0.3% in 2023

CAP25 re-affirms the previous commitment to increasing the share of renewable electricity to 50% by 2025 and 80% by 2030. Overall, the share of renewable electricity generation in Ireland increased from 38.6% to 40.7% from 2022 to 2023. The figure for 2024 will likely be between 40% and the interim, end of year target of 50% set out in CAP25.

The targets are:

- onshore wind, 2GWs by 2025 and 9 GWs by 2030
- offshore wind, at least 8GWs by 2030
- solar, up to 5GW by 2025 and 8GW by 2030

These targets are unchanged for the previous two years. CAP25 states

"A renewables-led system is at the core of Ireland's plan to radically reduce emissions in the electricity sector, protect our energy security, and ensure our economic competitiveness. This requires the accelerated and increased deployment of new renewable electricity generation capacity and related infrastructure."

3.4.3 The Climate Action Plan 2024

The Climate Action Plan 2024¹⁴ (CAP2024) sets out Ireland's ongoing, urgent response to the climate crisis and outlines actions to cut emissions in the electricity sector by 75% based on 2018 levels by 2030 and achieve net zero by 2050. It outlines a massive scaling up in the switch to renewable energy. The critical nature of the climate change challenge is identified in the plan as are the extensive direct and indirect threats of harm to Ireland and its people. Reducing GHGs to mitigate climate change is a key point, reiterated throughout the plan. It states that Ireland's greenhouse gas (GHG) emissions are estimated to have fallen by 1.9% in 2022 compared to 2021 but that this reduction falls short of the level of abatement required to meet national and international targets.

¹⁴Government of Ireland. (2024). Climate Action Plan 2024 <https://www.gov.ie/en/publication/79659-climate-action-plan-2024/> accessed 20/12/2024

In the plan, the goal in the electricity sector is to make Ireland less dependent on imported fossil fuels and the plan highlights the need to remove barriers to the development of renewables, including onshore wind. The plan notes that the war in Ukraine has had a significant impact on the cost and security of our energy supply. This underlines the importance of Ireland eliminating dependency on fossil fuels and that an increase in renewable energy generation, along with supporting flexibility and demand management measures, is necessary for our future energy security. To achieve this, energy needs to be decarbonised by harnessing renewable resources, particularly wind, solar PV and biomass.

The targets set out in the CAP2024 envisages a step-up of our existing targets to meet the required level of emissions reduction by 2030, including:

- Increase electricity generated from renewable sources to 80%
- Complete the phase-out of coal and peat-fired electricity generation
- 75% reduction in overall green-house gas emissions in the electricity sector compared to 2018 levels
- Increase onshore wind to 9GW

The driving force behind this aim is the intention to facilitate a large-scale deployment of renewables that will be critical to decarbonizing the power sector as well as enabling the electrification of other technologies. The plan notes that the transition away from fossil fuels and towards locally generated renewables will improve energy security and reduce Ireland's dependence on imported energy.

The CAP2024 notes that increased renewable electricity generation will play an important role in the decarbonisation of other sectors through electrification, including transport, heating, and industry. It underlines that the transition away from fossil fuels and towards locally generated renewables will improve energy security and Irelands dependence on imported energy. The plan has measures to accelerate renewable electricity generation, this includes:

"Ensure that renewable energy generation projects and associated infrastructure are considered to be in the overriding public interest".

These measures are in line with the REPowerEU plan and highlight the urgent need for additional renewable energy developments to reduce the reliance on fossil fuels, especially in light of the war in Ukraine and climate crisis.

One of the 'Key Metrics to Deliver Abatement in Electricity' is to accelerate flexibility. This includes the 2025 KPIs of;

- Maximum level of renewables at any one time on the grid: 85%
- Dispatch down (excluding surplus generation) of renewables below 7%.
- Minimise surplus generation
- Required long term storage (4 hour plus) in place.

The Proposed Development contributes to achieving these KPIs.

The plan notes that the deployment of renewables needs to outpace the growth in energy demand for it to deliver the absolute reductions in GHG emissions required. The demand for electricity in Ireland is predicted to grow by 19-50% in the next decade. Renewables accounted for 38.9% of electricity generated in 2022¹⁵, this needs to increase to 80% by 2030 to achieve the national target.

Therefore, there is a clear necessity of urgent national importance to increase the amount of energy from renewable sources.

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

"Given that the programme of large-scale offshore wind deployment is expected to be realised towards the end of the decade, deployment rates for onshore renewables will need to increase to match demand growth to ensure we keep electricity emissions within range of the carbon budgets. This requires a major upscaling and accelerating in current deployment of renewables, particularly onshore wind."

As an example, the historical average deployment of onshore wind installed capacity connected between 2008 and 2020 inclusive was ~280 MW per annum from 19 projects (with an annual maximum of 612 MW). To achieve the necessary emissions abatement, an approximately eight-times increase of renewable energy deployment to 2.3 GW annually would be needed between 2024 and 2030".

Among the most important measures in the plan is a target of 9GW from onshore wind by 2030. In Dec 2023 Ireland's total onshore wind generation capacity was 4.8GW¹⁶, leaving

¹⁵ SEAI. (2023). Energy in Ireland 2023. https://www.seai.ie/data-and-insights/seai-statistics/key-publications/energy-in-ireland/?gad_source=1&qclid=EAlaIqobChMlw_qE4JrnhQMVx5BQBh1W9wZdEAAAYASAAEglt8fD_BwE

¹⁶ Statista. (2024). Onshore wind energy capacity in Ireland 2008-2023 <https://www.statista.com/statistics/868474/onshore-wind-energy-capacity-in-ireland/>

a shortfall of 4.2GW to be achieved in 7 years. The Proposed Development is anticipated to have the capacity to generate between 12-15MW of renewable wind energy to contribute to these targets and reduce the shortfall.

CAP 2024 highlights the national obligation to increase the deployment of renewables including onshore wind to meet our legally binding sectoral emissions targets. In this regard, it makes abundantly clear that the rate of required renewable deployment is unparalleled and must be circa eight times faster in the period 2024 - 2030 than the historical average. In the EIAR submitted with this Planning Statement, **Chapter 3** assesses the Alternatives to the Proposed Development. This includes the Do-Nothing scenario in which the Project's contribution to EU and National renewable energy and greenhouse gas reduction targets would be lost, which in light of the climate emergency and energy security concerns is not a reasonable alternative to the deployment of renewable energy.

The plan identifies that increasing renewable energy will directly reduce emissions but also help with the electrification of other sectors stating:

"The electricity sector continues to face an immense challenge in meeting its requirements under the sectoral emissions ceiling, as the decarbonisation of other sectors, including transport, heating, and industry, relies to a significant degree on electrification. The deployment rates of renewable energy and grid infrastructure required to meet the carbon budget programme for electricity is unprecedented and requires urgent action across all actors to align with the national targets".

The Proposed Development will help to meet this increased demand and achieve these additional emissions savings. The plan notes that the transition away from fossil fuels and towards locally generated renewables will improve energy security and Ireland's dependence on imported energy. Section 12.1.3 of the CAP2024 sets out the scale of the challenge for the electricity sector:

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

Further measures include policies to increase energy storage to provide for smoothing of electricity supply and demand between times of high variable renewable production and

low variable renewable production. As part of the measures to accelerate flexibility in the electricity section, the CAP2024 includes developing a policy framework for electricity storage based on electricity system needs.

The Climate Action Charter for Local Authorities is a key action in the Climate Action Plan, it commits local authorities to actions that will ensure that they play a key leadership role locally and nationally in delivering effective climate action. These actions include that in so far as is practicable local authorities will put in place practicable, measures which reduce our carbon emissions in line with national objectives. It includes a commitment to ensure policies and practices at local government level lead the county towards low carbon pathways and put in place a process for carbon proofing major decisions, programmes and projects on a systematic basis, including investments in transport and energy infrastructure moving over time to a near zero carbon investment strategy.

The Proposed Development is anticipated to have the capacity to generate between 12-15MW and supports the target of doubling of onshore wind energy generation in Ireland by 2030 and contributes to the nation's target increase of renewable electricity from 30% to 80% by 2030 as set out in the Climate Action Plan 2024.

3.4.4 **National Planning Framework**

The National Planning Framework (NPF) is the overarching policy and planning strategy for the social, economic and cultural development of Ireland. The framework aims to promote a more environmentally focussed planning system at a local level. It states;

*'The future planning and development of our communities at local level will be refocused to tackle Ireland's higher than average carbon-intensity per capita and enable a national transition to a competitive low carbon, climate resilient and environmentally sustainable economy by 2050, through harnessing our country's **prodigious renewable energy potential.**'*

One of the national strategic outcomes in the NPF is 'Transition to a Low Carbon and Climate Resilient Society'. The NPF notes that the National Climate Policy Position establishes the national objective of achieving transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050. It highlights that new energy systems and transmission grids will be necessary for a more distributed, renewables-focused energy generation system. It notes that this will assist in harnessing the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar. It notes that accelerating climate action is a key national environmental

challenge. Renewable energy is credited as being a key part of the transition to a low carbon energy future.

The relevant policies for consideration in the National Planning Framework (NFP) are set out below;

National Policy Objective 15

Support the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities.

And

National Policy Objective 21

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

And

National Policy Objective 23

Facilitate the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture, energy and extractive industries, the bio-economy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism.

In the Clare County Development, the Wind Farm Site is in an area identified as 'Diversifying Areas'. The Proposed Development is a renewable energy project, located in a rural area. During the operational phase, agriculture and forestry land uses can continue, helping to diversify the land and support the local economy in a sustainable manner. Renewable energy projects, such as the Proposed Development can stimulate economic growth, it will create jobs and bring benefits to communities through Community Development Funds and commercial rates (€ 74,372 per annum).

National Policy Objective 52

The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to

the requirements of all relevant environmental legislation and the sustainable management of our natural capital.

The Project has been subject to EIA and NIS. The Proposed Development has been assessed under each of the topics contained in the EIAR and there will be no significant residual environmental effects. It is clear from the findings of the EIAR and the NIS that the Proposed Development is located in an appropriate location.

National Policy Objective 54

Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.

National Policy Objective 54 has been fulfilled by the establishment of national, regional and local policy to facilitate renewables. By demonstrating accordance with these policies, the Proposed Development will contribute to the achievement of this national policy objective.

National Policy Objective 55

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

The Proposed Development is a renewable energy project and according to the Wind Energy Designation map included within the Wind Energy Strategy, the proposed site is contained entirely within an area identified in the County Clare WES (Clare CDP 2023-2029, Vol 6) as being 'Open to Consideration' in terms of wind energy development. There are 'Acceptable in Principle' areas a short distance to the north and east and favourable 'Strategic' areas to the northeast. The areas deemed 'Not Normally Permissible' are further west and generally hug the coastline. The relevant 'Open to Consideration' designation is referenced in the following manner:

'Wind energy Applications in these areas will be evaluated on a case-by-case basis subject to viable wind speeds, environmental resources and constraints and cumulative impacts.'

There are reasonable wind speeds at the site ranging from 7.00-7.25m/s at 50m, 8.75-9.00m/s at 100m, and 10.50-10.75m/s at 200m)¹⁷.

The Proposed Development has been assessed under each of the topics contained in the EIAR, with no significant adverse residual environmental effects in line with National Policy Objective 55 of the NFP. It is clear from the findings of the EIAR and the NIS that the Proposed Development is located in an appropriate location as there will be no likely significant effects.

National Policy Objective 64

Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green infrastructure planning and innovative design solutions.

Although BPO64 is not directly relevant to the Project. The Project will indirectly support the transition to heating systems with zero local emissions.

Chapter 12: Air and Climate in the EIAR concludes that during the operational phase of the Proposed Development the effects on air quality are assessed as being slight, positive and long-term in nature due to the displacement of heavily polluting fossil fuels through the provision of renewable energy. No likely significant effects on air quality.

The Proposed Development is compliant with the vision of the National Planning Framework to transition to a low carbon and sustainable economy, especially those policy objectives relating to climate action and renewable energy; National Policy Objectives 54 and 55. It is also compliant with objectives relating to rural diversification and economic development; National Policy Objectives 15, 21 and 23, and those regarding environmental protection and improving air quality; National Policy Objectives 52 and 64.

¹⁷

SEAI

Wind

Atlas.

Available

at:

https://experience.arcgis.com/experience/adeb20a08bdd477082a3975b3483cce6#data_s=id%3AdataSource_1-1910e3d2e29-layer-5%3A13. [Accessed at: 20/08/2024]

3.4.5 Draft National Planning Framework

On the 8th April 2025, the Government approved the revised National Planning Framework (NPF) which, subject to the approval of both Houses of the Oireachtas, signals the conclusion of the NPF revision process which has been underway since June 2023. Although still in draft form, this Planning Statement includes an analysis of the Proposed Development against the proposed draft NPF. This analysis is included to assist the local planning authority in the event that the draft NPF is adopted prior to the determination of the application for the Proposed Development. However, the Developer notes that it is the current NPF that should form the basis of the authority's decision until such a time as the draft NPF is formally adopted.

The draft plan has a much greater focus on climate action and environmental protection which is relevant to the Proposed Development.

In the energy sector, the draft plan emphasises that transition to a zero carbon economy from renewable sources of energy is an integral part of Ireland's climate change strategy and that the government supports the accelerated delivery of additional renewable electricity generation. Renewable energies are highlighted as a means of improving Ireland's energy security by reducing reliance on imported fossil fuels and diversifying its electricity supply.

The draft plan notes that renewable energy generation in rural areas (such as the Proposed Development location) enables carbon emission reductions, land-use diversification and helps to meet electricity demand.

The draft plan credits renewable energy with stimulating economic growth and job creation, as well as bringing benefits to communities through Community Development Funds and commercial rates. If consented, the Proposed Development would provide a community fund calculated in accordance with the Renewable Electricity Support Scheme (RESS) Terms and Conditions at €2 per MWh of electricity produced by the project. This is to be made available to the local community for the duration of the RESS (15 years).

The draft plan includes the following Policy Objectives relevant to the Proposed Development;

National Policy Objective 1

Ensure that all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA, SFRA and AA, as appropriate.

The Project has been subject to EIA and AA/NIS.

National Policy Objective 69

Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions as expressed in the most recently adopted carbon budgets.

The Proposed Development is anticipated to have the capacity to generate between 12-15MW of renewable wind energy, contributes towards the national target of a zero carbon and climate resilient Ireland by 2050 by displacing greenhouse gas emitting fossil fuels and reducing Ireland's carbon footprint.

National Policy Objective 70

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

The Proposed Development is a renewable energy project located in an area identified in the County Clare WES as being 'Open to Consideration' in terms of wind energy development. The Proposed Development has also been assessed under each of the topics contained in the EIAR, with no significant residual environmental. It is clear from the findings of the EIAR and the NIS that the Proposed Development is located in an appropriate location.

National Policy Objective 71

Support the development and upgrading of the national electricity grid infrastructure, including to support the delivery of renewable electricity generating development.

The Proposed Development will contribute directly and in the long-term to the national electricity grid infrastructure by strengthening it through the addition of electrical transmission infrastructure and through renewable energy generation.

National Policy Objective 73

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

Agricultural grazing and forestry (outside of biodiversity buffer zones) can also continue at the Wind Farm Site and in the surrounds. There are also two biodiversity enhancement areas included in the Project. This maximises the land use by diversification and allows the Proposed Development to efficiently exploit the renewable energy resource potential of the area. The Project aligns with the SEA and AA for Clare CDP 2023-2029.

National Policy Objective 74

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

And

National Policy Objective 75

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

Table 9.1 in the draft plan identifies that the Southern Region, the region relevant to the Proposed Development, had an energised capacity of 2,622MW of onshore wind in 2023, and an additional allocation of 978MW, 40% of national share by 2030. This leaves a 978MW to be installed in 7 years. The Proposed Development, with an anticipated capacity

to generate between 12-15MW of renewable electricity, would contribute to the outstanding onshore wind targeted to the region.

The Clare County Development Plan 2023 – 2029 includes Development Plan Objective CDP8.12;

'To support the implementation of the National Renewable Energy Action Plan (NREAP), the Clare Wind Energy Strategy and the Clare Renewable Energy Strategy to facilitate the development of renewable energy developments in rural areas to meet national objectives towards achieving a low carbon economy by 2050 subject to the requirement of the RES SEA Environmental Report and the mitigation measures arising from the CDP Appropriate Assessment as contained in Volume 10(a).'

The Proposed Development is a renewable energy project located in an area identified in the County Clare WES as being 'Open to Consideration' in terms of wind energy development. The Proposed Development aligns with the requirements of the Clare CDP 2023-2029 AA and SEA. The Proposed Development has been assessed under each of the topics contained in the EIAR, with no significant residual environmental effects. It is clear from the findings of the EIAR and the NIS that the Proposed Development is located in an appropriate location

National Policy Objective 85

In line with the National Biodiversity Action Plan; the conservation, enhancement, mitigation and restoration of biodiversity is to be supported by:

- **Integrating policies and objectives for the protection and restoration of biodiversity, including the avoidance and/or minimisation of potential biodiversity impacts, in statutory landuse plan.**
- **Retention of existing habitats which are currently important for maintaining biodiversity (at local/regional/national/international levels), in the first instance, is preferable to replacement/restoration of habitats, in the interests of ensuring continuity of habitat provision and reduction of associated risks and costs.**

The design and layout of the Proposed Development follows the recommendations and industry guidelines set out in the 'Wind Energy Development Guidelines' (Department of the Environment, Heritage and Local Government, 2006), 'Best Practice Guidelines for the Irish Wind Energy Industry' (Irish Wind Energy Association, 2012) and has taken cognisance of the Draft Revised Wind Energy Development Guidelines 2019. The layout and design were an iterative process which followed the constraints-led design approach

outlined in Chapter 3: Alternatives Considered. The constraints identification process included the gathering of information through detailed desk-based assessments, field surveys and consultation. The ecological assessments of the Wind Farm Site encompassed habitat mapping and extensive surveying of birds and other fauna. Sensitive ecological receptors were mapped, and the design constraints were applied including avoidance of pockets of deep peat, hedgerows and other sensitive habitats and setbacks to watercourses. This process has ensured that existing habitats are retained in line with Policy Objective 84. In addition, a Biodiversity Enhancement and Management Plan (BEMP) has been prepared for the Proposed Development. The objectives of the BEMP include: **1.** to enhance an existing area of cutover bog that has been improved for grazing and is now largely dominated by wet grassland with frequent rushes, **2.** to enhance an area of Molinia meadow (Annex I listed) which has been degraded by over-grazing and which has potential to provide habitat suitable for marsh fritillary (Annex II listed) and **3.** to offset the loss of hedgerows by a replanting programme. The BEMP is outlined in **Chapter 6: Biodiversity** of the EIAR and is presented in full in **Appendix 6.11** of the EIAR.

National Policy Objective 93

Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green and blue infrastructure planning and innovative design solutions.

Chapter 12: Air and Climate in the EIAR concludes that during the operational phase of the Proposed Development the effects on air quality are assessed as being slight, positive and long-term in nature due to the displacement of heavily polluting fossil fuels through the provision of renewable energy.

3.4.5.1 Overall conclusions on Draft Revised NPF

This Planning Statement has provided analysis of the Proposed Development against the Draft National Planning Framework in case it is adopted prior to determination stage. The Proposed Development makes a contribution to a significant number of policy objectives in the draft plan, especially relevant are 70, 71, 73, 74 and 75 in relation to renewable energy and electrical infrastructure and policy objective 69 and 93 in relation to reducing Ireland carbon footprint and greenhouse gas emissions and improving air quality. The Proposed Development contributes to policy objective 31 and 32 in relation to the rural economy and regional growth and 68 in relation to electrification. The Proposed Development is in

compliance with policy objectives 67, 79, 84, 86, 87 in relation to environmental protection and biodiversity enhancement and policy objective 94 regarding the protection of population and human health including noise.

3.4.6 National Energy Security Framework

An Energy Security Emergency Group was established in April 2022 to coordinate and oversee Ireland's response to the Russian invasion of Ukraine. This group, chaired by the Department of the Environment, Climate and Communications, has overseen the development of a new National Energy Security Framework in April 2022. It provides a single overarching and initial response to address Ireland's energy security needs in the context of the war in Ukraine. It sets out how Ireland is seeking to phase out dependency on Russian gas, oil and coal imports as soon as possible in order to address the urgent need to secure Ireland's energy supply.

It is focused on three areas of work:

- Reducing demand for fossil fuels, which would seek to reduce overall demand for oil, natural gas and coal in Ireland.
- Replacing fossil fuels with renewables, which would seek to reduce the use of gas, oil and coal in Ireland by replacing it with renewable energy sources such as wind energy, solar energy or bioenergy.
- Diversifying fossil fuel supplies, which would seek to replace any Russian supplies of gas, oil and coal (direct or indirect) with supplies from other sources.

The framework highlights the impact of the Russian invasion of Ukraine on energy security, consumer price wise in the short term and how and where energy is sourced to ensure long term system resilience. The framework builds on the idea of energy security as the uninterrupted availability of energy sources at an affordable price and is a response to the challenges of ensuring the ongoing and long-term security of affordable energy supply.

Ireland has one of the highest rates of importing fuel in Europe with imported dependency increasing to 81.6% in 2022 according to the SEAI¹⁸. Electricity demand in Ireland has significantly increased in the past decade. This is mainly attributed to increases from large energy users. In the commercial services sector, since 2012, electricity demand increased by 61.5%, the subsector of information & communication has seen the largest increase in

¹⁸ SEAI. (2023). ENERGY IN IRELAND. Available [here](#) Accessed 26/10/2024

this period of 562%¹⁹. Electricity demand is expected to grow by 37% to 2031²⁰. Residential electricity prices in Ireland have seen an average increase of 10.4% and business electricity prices an increase of 43.9% between 2021 and 2022²¹. Increases to the cost of carbon, supply issues and potential political insecurity increases fossil fuel price volatility.

The new framework underlines the importance of new renewable energy generation projects, such as Proposed Development, in securing Ireland's energy supply in light of the war in Ukraine and resulting energy supply issues.

The high rate of imported fossil fuel dependency and the increasing demand for electricity make it vital to introduce more domestic renewable energy generation plants, such as the Moanmore Lower Wind Farm to provide reliable, secure and affordable energy supplies in Ireland. The Proposed Development, by producing renewable energy, is in line with the National energy Security framework, helping to improve energy security. The provision of energy storage also assists in maximising the energy output of the wind farm, improving its contribution.

3.4.7 **National Energy and Climate Plan 2021-2030**

The National Energy and Climate Plan²² (NECP) is a ten-year integrated document mandated by the European Union to each of its member states in order for the EU to meet its overall greenhouse gases emissions targets. The plan is required to be updated every two years an updated version was released on 29th July 2024.

The plan establishes key measures to address the five dimensions of the EU Energy Union:

- 1) Decarbonisation: GHG emissions and removals and Renewable Energy;
- 2) Energy efficiency;
- 3) Energy security;
- 4) Internal energy market, and
- 5) Research, innovation and competitiveness.

¹⁹ SEAI (2023). Online available [here](#) Accessed 26/10/2024

²⁰ EirGrid. (2022). EirGrid's Generation Capacity Statement Predicts Challenging Outlook for Ireland <https://www.eirgridgroup.com/newsroom/eirgrids-generation-capacity/#:~:text=The%20GCS%2C%20in%20its%20median,relatively%20consistent%20across%20the%20decade.> Accessed 19/09/2024

²¹ SEAI. (2022). Energy in Ireland <https://www.seai.ie/publications/Energy-in-Ireland-2022.pdf> Accessed 18/09/2024

²² Department of Communications, Climate Action and Environment. (2024). National Energy and Climate Plan <https://www.gov.ie/en/publication/a856a-national-energy-and-climate-plan-necp-2021-2030/#:~:text=National%20Energy%20and%20Climate%20Plans,the%20Governance%20of%20the%20Energy> Accessed 08/12/24

The plan notes that Ireland has excellent renewable energy resources, it credits renewable energy with increasing sustainability through the use of clean power sources and enhancing energy security by reducing Ireland's dependence on imported fuels.

Key, relevant renewable energy objectives include:

- Ireland has established an objective of achieving a 34% share of renewable energy in energy consumption by 2030.
- Increase electricity generated from renewable sources to 70% (note this target has been increased to 80% in the CAP2025), underpinned by the Renewable Electricity Support Scheme (RESS). Streamline consenting and connection arrangements.
- Phase-out of coal and peat-fired electricity generation.
- Increase onshore wind capacity by up to 8.2 GW (note this target has been increased to 9 GW in the CAP2025).

Key, relevant energy security objectives include:

- Support efforts to increase indigenous renewable sources in the energy mix, including wind, solar and bioenergy.
- Facilitate infrastructure projects, including private sector commercial projects, which enhance Ireland's security of supply and are in keeping with Ireland's overall climate and energy objectives.

The Proposed Development, by producing renewable energy, is in line with the NECP, this helps to meet the plan objectives of reducing GHG emissions, improving energy security, phasing out fossil fuels and renewable energy targets, including increasing onshore wind capacity by up to 8.2 GW (note this target has been increased to 9 GW in the CAP2025). The provision of energy storage also contributes to energy efficiency objectives.

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3.4.8 Programme of Government 2025: Securing Ireland's Future

Programme for Government 2025: Securing Ireland's Future was published in January 2025 by the Department of the Taoiseach. This is a Programme of investment and reform, backed by ambitious and credible actions, which will protect those things upon which our country values and relies, while also supporting significant progress in addressing critical social, economic, political, demographic and environmental challenges.

It commits to sustained action to tackle the climate crisis; to decarbonise the economy; and harness the digital and AI revolution to deliver effective and modern public services and to grow the economy. It commits to taking the necessary action to deliver at least 80% renewable electricity by 2030. Increased renewable energy, alongside energy efficiency and the circular economy are integral to the programme.

The Proposed Development is in compliance with Programme for Government 2025 as it provides additional renewable energy, helping to meet the commitments to increase renewable energy, reduce greenhouse gas emissions and the transition to a low carbon future.

3.5 The Regional Spatial and Economic Strategy (RSES) for the Southern Regional Assembly (SRA)

The Regional Spatial and Economic Strategy (RSES) for the Southern Regional Assembly (SRA) came into effect on 31st January 2020. The objective of the RSES is to support the implementation of the National Planning Framework and the economic policies and objectives of the Government by providing a long-term planning and economic framework which shall be consistent with the National Planning Framework (NPF) and the economic policies or objectives of the Government. The RSES sets objectives at a regional level, informs the County Development Plan and Local Area Plans.

The RSES provides a development framework of the region that supports the implementation of the NPF and the relevant economic policies and objectives of the government. It provides a 12-year strategy for the period 2019 – 2031 to achieve the

objectives and vision of the regional assembly. Within the RSES, the Regional Policy Objectives (RPO) in relation to renewable energy are set out in **Table 3.1**.

Table 3.1: Key Planning Policy Objectives from the RSES

Regional Policy Objective (RPO)	Project contribution
<i>RPO 40 Regional Economic Resilience; It is an objective to sustainably develop, deepen and enhance our regional economic resilience by widening our economic sectors, boosting innovation, export diversification, productivity enhancement and access to new markets.</i>	The Development represents a major investment in the region and in renewable energy. It will provide an improved and more resilient renewable electricity supply in the area. This could attract new enterprise to the region, bringing jobs, economic growth and diversification. The increased renewable electricity supply will also help to meet increased demand to facilitate further economic growth.
<i>RPO 46 Digital and Physical Infrastructure in Rural Areas; It is an objective to expedite the completion of infrastructure servicing diverse settlements to support innovation, enterprise start-ups and competitiveness. This includes high quality broadband and mobile communication services to all rural locations, water and wastewater facilities for the growth of settlements, sustainable energy supply, enhanced transport connectivity including rural public transport services and greenway walking and pedestrian corridors between settlements.</i>	The Development, by producing renewable electricity in a rural area, provides a sustainable energy supply. The Development includes a substation and grid connection which will become an asset of the nation grid, upgrading the physical electricity infrastructure in the region. By providing renewable electricity, the Development further boosts the positive environmental effect of an increase in electronic vehicle use, including those in rural public transport services. It also increases the stability of energy supply to meet the growing demand of increased electrification.
<i>RPO 49 Innovation in Rural areas; It is an objective to support innovation, enterprise start-ups and competitiveness of our rural Region.</i>	The Development is located in a rural area, it represents a significant investment into the locality in an

Regional Policy Objective (RPO)	Project contribution
	innovative and sustainable industry. The community benefit fund associated with the Development would amount to an average of € 74,372 per annum. The Development will also create local employment opportunities throughout the construction, operational and decommissioning phases. These opportunities include local contractors being employed, local suppliers being sourced when possible, and the use of hotels and other services. It will provide an additional supply of renewable electricity within the county. This could attract new enterprise to the region, bringing jobs, economic growth and population increases. The introduction of renewable electricity helps to stabilise and reduce electricity costs, making Ireland a more attractive investment location. The increased renewable electricity supply will also help to meet increased demand to facilitate further economic growth
<i>RPO 50 Diversification; It is an objective to further develop a diverse base of smart economic specialisms across our rural Region, including innovation and diversification in agriculture (agri-Tech, food and beverage), the marine (ports, fisheries and the wider blue economy potential), forestry, peatlands, renewable energy, tourism (leverage the opportunities from the Wild Atlantic Way, Ireland's Ancient East and Ireland's Hidden</i>	The Development is a renewable energy project. The Site is located in agricultural lands, represents diversification for the farmers involved. The Development also provides the opportunity to reinforce the existing local renewable energy industry knowledge and skills base through employment, providing stability and

Regional Policy Objective (RPO)	Project contribution
<i>Heartlands brands), social enterprise, circular economy, knowledge economy, global business services, fin-tech, specialised engineering, heritage, arts and culture, design and craft industries as dynamic drivers for our rural economy</i>	diversity to the rural economy that can drive further investment.
<i>RPO 56 Low Carbon Economy;</i> <i>a. The RSES recognises the urgency to transition to a low carbon future and it is therefore an objective to accelerate the transition towards low carbon economy and circular economy through mechanisms such as the Climate Action Competitive Fund;</i> <i>b. It is an objective to develop enterprises that create and employ green technologies.</i> <i>c. Local authorities should ensure that the development of green industry and technologies incorporates careful consideration of potential environmental impacts at project level including the capacity of receiving environment and existing infrastructure to serve new industries.</i> <i>d. Local authorities shall include objectives in statutory land use plans to promote energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retro fitting of energy efficiency measures in the existing building stock, energy efficiency in traditional buildings and initiatives to achieve Nearly Zero-Energy Buildings (NZEB) standards in line with the Energy Performance of Buildings Directive (EPBD).</i> <i>e. It is an objective to support investments in energy efficiency of existing commercial and public building stock with a target of all public buildings and at least one-third of total</i>	Renewable energy, wind energy in particular, is identified throughout this review as being required to play a vital role in mitigating climate change by transitioning to a low carbon economy and society. The Development will contribute to the regions electricity network by producing 12-15MW of renewable electricity. The site location has been selected for its excellent wind resource and minimal environmental impacts; these impacts have been assessed throughout this EIAR. By producing renewable energy for use in the region, the Development helps to contribute to lowering the carbon footprint of existing and new buildings. It is estimated that 335,568 tonnes (lower range) or 419,460 tonnes (higher range) of CO₂ will be displaced over the proposed 40-year lifetime of the wind farm.

Regional Policy Objective (RPO)	Project contribution
<i>commercial premises upgraded to BER Rating 'B'. Local authorities shall report annually on energy usage in all public buildings and will achieve a target of 33% improvement in energy efficiency in all buildings in accordance with the National Energy Efficiency Action Plan (NEEAP)</i>	
<i>RPO 96: Integrating Renewable Energy Sources; To support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate renewable energy sources and ensure our national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grows.</i>	The Development produces renewable wind energy by harnessing the wind resource of the southern region and helping to meet the increased energy demand as the regional economy grows. The Development includes a substation and grid connection which will become assets of the national grid, upgrading the electricity infrastructure in the region.
<i>RPO 99: Renewable Wind Energy; To support the sustainable development of renewable wind energy (onshore and offshore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.</i>	The Development is an excellent example of sustainable development it has been assessed under each of the topics contained in the EIAR and has been found to be in a suitable location. The Development is located in an area designated 'Open to Consideration' to wind farm development in the Clare County Development Plan. The Development has been designed in accordance with the current Wind Energy Development Guidelines 2006 and has had regard to the Draft Revised Wind Energy Development Guidelines 2019
<i>RPO 100: Indigenous Renewable Energy Production and Grid Injection; To support the</i>	The Development will provide up to 15MW of renewable, indigenously

Regional Policy Objective (RPO)	Project contribution
<i>integration of indigenous renewable energy production and grid injection.</i>	produced wind energy. This additional renewable power generated will contribute to a reduction in greenhouse gas emissions from fossil fuels, improve regional/national energy security and help Ireland achieve our renewable electricity targets.

The RSES recognises and aims to support the many opportunities for wind as a major source of renewable energy. It declares that opportunities for both commercial and community wind energy projects should be harnessed, having regard to the requirements of DoHPLG Guidelines on wind energy. It also states that wind energy technology has an important role in delivering value and clean electricity for Ireland.

Action EL/23/2 of the Climate Action Plan, 2023 requires the publication of a Renewable Electricity Spatial Policy Framework to set out targets for onshore renewable electricity to inform spatial plans and that a roadmap for the development of the Regional Electricity Strategies be published by Q4, 2023. Note this has not yet been published.

As identified in **Table 3.1** above, the Development is in line with the regional policies as set out in the RSES. By producing renewable energy, in a suitable location, the Development contributes to policies associated with transitioning to a low carbon economy, economic development and rural diversification. This contributes to positioning County Clare as a leader in delivery of renewable electricity for the Southern Regional Assembly region.

3.6 **Relevant Planning Policies from The Clare County Development Plan 2023-2029**

The planning policies detailed in Table 3.2 are of relevance to the planning application proposals.

Table 3.2 Relevant Planning Policies from the Clare County Development Plan 2023-2029

Clare County Development Plan 2023-2029 – Development Objective	Development Contribution
CDP2.14 Transition to a Low Carbon Economy and Society <i>It is an objective of Clare County Council:</i> <i>a) To facilitate measures which will accelerate the transition to a low carbon economy and a circular economy through mechanisms such as the Climate Action Competitive Fund;</i> <i>b) To support the development of enterprises that create and employ green technologies and to promote County Clare as a low carbon county as a means of attracting inward investment to the county and to the wider Southern Region;</i> <i>d) To support and facilitate the implementation of the Clare Climate Change Adaptation Strategy 2019-2024;</i> <i>e) To ensure that the development of green industry and technologies incorporates careful consideration of potential environmental impacts at project level including the capacity of the receiving environment and existing infrastructure to serve these new industries.</i> <i>f) To facilitate the development of energy sources which will achieve low carbon output.</i> <i>h) To work to implement the provisions of Ireland's Transition to a Low Carbon Energy Future 2015-2030 as they relate to County Clare;</i> <i>j) To promote climate change issues across business, public and residential sectors and to target measures and support initiatives to achieve reduced greenhouse gas emissions in accordance with current and future national targets, improve energy efficiency and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture;</i>	The Proposed Development complies with CDP 2.14 and will support Clare County Council in reducing greenhouse gas emissions by increasing the production of renewable energy in the county. The Proposed Development supports County Clare's Climate Change Adaptation Strategy 2019-2024. The proposed Development will displace 8,389 tonnes (lower range) or 10,478 (higher range) of CO₂ per annum produced by largely carbon-based traditional energy production. This will help contribute to the targets (greenhouse gas (GHG) emissions from the energy sector will be reduced by between 80% and 95%, compared to 1990 levels, by 2050, and will fall to zero or below by 2100.) set out in Ireland's Transition to a Low Carbon Energy Future 2015-2030.

Clare County Development Plan 2023-2029 – Development Objective	Development Contribution
CDP3.3 Appropriate Assessment, Strategic Environmental Assessment and Strategic Flood Risk Assessment <i>It is an objective of the Clare County Council:</i> <i>a) To require compliance with the objectives and requirements of the Habitats Directive, specifically Article 6(3) and where necessary 6(4), Birds, Water Framework, and all other relevant EU Directives and all relevant transposing national legislation;</i> <i>b) To require project planning to be fully informed by ecological and environmental constraints at the earliest stage of project development and any necessary assessment to be undertaken, including assessments of disturbance to species, where required together with the preparation of both statutory and non-Statutory Ecological Impact Assessments (EcIA);</i> <i>c) To protect, manage and enhance ecological connectivity and improve the coherence of the Natura 2000 Network;</i> <i>d) To require all proposals to ensure there is ‘no net loss’ of biodiversity within developments;</i> <i>e) To ensure that European sites and Natural Heritage Areas (designated proposed NHAs) are appropriately protected;</i> <i>f) To require the preparation and assessment of all plans and projects to have regard to the information, data and requirements of the Appropriate Assessment Natura Impact Report, SEA Environmental Report and Strategic Flood Risk Assessment Report contained in Volume 10 of this development plan; and</i> <i>g) to require compliance with the objectives of the Water Framework Directive and support the implementation of the 3rd Cycle River Basin Management Plan (and any other iteration during the lifetime of the plan).</i>	A NIS has been prepared for the Proposed Development and concluded “The assessment carried out in this report confirms, with no reasonable scientific doubt, that the proposed Project will not adversely affect the integrity of any of the relevant European sites, namely the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA, either individually or in-combination with other plans and projects.” The EIAR Chapter 6 Biodiversity assessed the likely significant direct and indirect effects that the Proposed Development may have on Terrestrial Ecology, including habitats, flora, invertebrates, mammals and birds. It concluded the Proposed Development will not have any significant residual effects on Biodiversity and there will be no net loss of biodiversity associated with the Proposed Development.

Clare County Development Plan 2023-2029 – Development Objective	Development Contribution
	A Flood Risk Assessment (Appendix 9.1) and a Water Framework Directive Compliance Assessment Report (Appendix 9.2) have been prepared for the Proposed Development. The likely significant direct and indirect effects that the Proposed Development on hydrology and hydrology were assessed in Chapter 9 of the EIAR and found the Proposed Development will have no significant residual effects on hydrology or hydrology. The Proposed Development aligns with the Appropriate Assessment Natura Impact Report, SEA Environmental Report and Strategic Flood Risk Assessment Report contained in Volume 10 of this development plan.
CDP6.17 Energy Supply <i>It is an objective of Clare County Council:</i> <i>a) To contribute to the economic development and enhanced employment opportunities in the county by:</i> <i>i) Enabling the development of a self-sustaining, secure, reliable and efficient renewable energy supply and storage for the County in line with CDP Objective 3.3; ii) Facilitating the</i>	The Proposed Development is a sustainable on-shore renewable energy development that will supports Clare's energy supply objectives.

Clare County Development Plan 2023-2029 – Development Objective	Development Contribution
county to become a leader in the production of sustainable and renewable energy for national and international consumption through research, technology development and innovation; and iii) Supporting on-land and off-shore renewable energy production by a range of appropriate technologies in line with CDP Objective 3.3.	
CDP8.12 Renewable Energy Development <i>It is an objective of Clare County Council: To support the implementation of the National Renewable Energy Action Plan (NREAP), the Clare Wind Energy Strategy and the Clare Renewable Energy Strategy to facilitate the development of renewable energy developments in rural areas to meet national objectives towards achieving a low carbon economy by 2050 subject to the requirement of the RES SEA Environmental Report and the mitigation measures arising from the CDP Appropriate Assessment as contained in Volume 10(a).</i>	The Proposed Development is a sustainable on-shore renewable energy development that will supports Clare's rural areas to meet national objectives towards achieving a low carbon economy by 2050. The Proposed Development aligns with requirement of the RES SEA Environmental Report and the mitigation measures arising from the CDP Appropriate Assessment as contained in Volume 10(a).
CDP11.44 Energy Security <i>It is an objective of Clare County Council: To promote and facilitate the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure, to integrate renewable energy sources, thereby creating a secure and efficient energy supply and storage system for County Clare which is ready to meet increased demand as the regional economy grows.</i>	The Proposed Development is a renewable energy development that will supports County Clare's energy security objective.
CDP11.45 Electricity Networks <i>It is an objective of Clare County Council:</i>	The Proposed Development is a renewable energy development that will County Clare's

Clare County Development Plan 2023-2029 – Development Objective	Development Contribution
a) To facilitate improvements in energy infrastructure and encourage the expansion of the infrastructure within the county; b) To facilitate future alternative renewable energy developments and associated utility infrastructure throughout the county; e) To collaborate with EirGrid over the lifetime of the plan to ensure that the county's minimum target of 1,167MW of renewable energy generation is achieved and can be accommodated on the electricity network in County Clare; and, f) To have regard to environmental and visual considerations in the assessment of developments of this nature and ensure compliance with the environmental requirements of objective CDP 3.3 of this plan.	minimum target of 1,167MW of renewable energy generation. EIAR Chapter 11 assessed the likely significant direct and indirect effects of the Proposed Development on the landscape and visual amenity of the receiving environment. It concluded there will be no significant effects on landscape and visual amenity from the Proposed Development.
CDP11.47: Renewable Energy It is an objective of Clare County Council: a) To encourage and to favourably consider proposals for renewable energy developments, including community owned developments, and ancillary facilities in order to meet National, Regional and County renewable energy targets, and to facilitate a reduction in CO₂ emissions and the promotion of a low carbon economy; b) To assess future renewable energy-related development proposals having regard to the Clare Renewable Energy Strategy 2023-2029 in Volume 5 of this plan and associated SEA and AA; c) To support the sustainable development of renewable wind energy (onshore and offshore) at appropriate locations and of its related grid infrastructure in County Clare, in accordance with all relevant policies, guidance and guidelines pertaining to the protection of the environment and protected habitats and species, and to assess proposals having regard to	The Proposed Development is a renewable energy project that will help County Clare meet its renewable energy objectives. The EIAR for the Proposed Development assessed the likely direct and indirect significant effects of the Proposed Development on: • Population & Human Health • Biodiversity • Aquatic Ecology • Soils & geology • Hydrology & Hydrogeology • Noise and Vibration

Clare County Development Plan 2023-2029 – Development Objective	Development Contribution
the Clare Wind Energy Strategy in Volume 6 of this plan and the associated SEA and AA, or any subsequent updated adopted strategy and to National Wind Energy Guidelines; e) To strike an appropriate balance between facilitating renewable and wind energy-related development and protecting the residential amenities of neighbouring properties; g) To support the integration of indigenous renewable energy production and grid injection; h) To ensure that all proposals for renewable energy developments and ancillary facilities in the county are in full compliance with the requirements of the SEA and Habitats Directives and objective CDP 3.3 of this plan; and, i) To promote and market the county as a leader of renewable energy provision.	• Landscape and Visual Amenity • Air Quality and Climate • Shadow Flicker and EMI • Archaeology and Cultural Heritage • Material Assets • Traffic and Transport The assessments for each of these technical headings found the Proposed Development will have no significant residual effects.
CDP 14.2 Settled Landscape It is an objective of Clare County Council: To permit development in areas designated as 'settled landscapes' to sustain and enhance quality of life and residential amenity and promote economic activity subject to: - Conformity with all other relevant provisions of the Plan and the availability and protection of resources; - Selection of appropriate sites in the first instance within this landscape, together with consideration of the details of siting and design which are directed towards minimising visual impacts; - Regard being had to the need to avoid intrusion on scenic routes and on ridges or shorelines. Developments in these areas will be required to demonstrate:- a) That the site has been selected to avoid visual prominence	The impact on Landscape and visual amenity is considered throughout the site selection process right through to layout design as detailed in Chapter 3 Alternatives. The Landscape and Visual assessment detailed in EIAR Chapter 11 concluded there will be no significant effects on landscape and visual amenity from the proposed Development.

Clare County Development Plan 2023-2029 – Development Objective	Development Contribution
<i>b) That the site layouts avail of existing topography and vegetation to reduce visibility from scenic routes, walking trails, water bodies, public amenities and roads.</i> <i>c) That design of buildings and structures reduces visual impact through careful choice of forms, finishes and colours, and that any site works seek to reduce visual impact.</i>	
CDP14.7 Scenic Routes <i>It is an objective of Clare County Council: a) To protect sensitive areas from inappropriate development while providing for development and change that will benefit the rural community; b) To ensure that proposed developments take into consideration their effects on views from the public road towards scenic features or areas and are designed and located to minimise their impact; and c) To ensure that appropriate standards of location, siting, design, finishing and landscaping are achieved.</i>	ElAR Chapter 11 assessed the likely significant direct and indirect effects of the Proposed Development on the landscape and visual amenity of the receiving environment. It concluded there will be no significant effects on designated views from the Proposed Development.
CDP15.3 European Sites	A NIS has been prepared for the Proposed Development and concluded “The assessment carried out in this report confirms, with no reasonable scientific doubt, that the proposed Project will not adversely affect the integrity of any of the relevant European sites, namely the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA, either individually or in-combination with other plans and projects.”

Clare County Development Plan 2023-2029 – Development Objective	Development Contribution
CDP15.4: Requirement for Appropriate Assessment <i>It is an objective of Clare County Council:</i> a) <i>To implement Article 6(3) and where necessary 6(4) of the Habitats Directive and to ensure that Appropriate Assessment is carried out in relation to works, plans and projects likely to impact on European sites (SACs and SPAs), whether directly or indirectly or in combination with any other plan(s) or project(s); and</i> b) <i>To have regard to Appropriate Assessment of Plans and Projects in Ireland – Guidelines for Planning Authorities 2009 or any updated version.</i>	An Appropriate Assessment and NIS have been prepared for the Proposed Development. The NIS concluded “The assessment carried out in this report confirms, with no reasonable scientific doubt, that the proposed Project will not adversely affect the integrity of any of the relevant European sites, namely the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA, either individually or in-combination with other plans and projects.”
CDP15.5: Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs) <i>It is an objective of Clare County Council:</i> a) <i>To actively promote the conservation and protection of areas designated as NHA's (including proposed sites) and to only consider proposals for development within or affecting an NHA where it can be clearly demonstrated that the proposed development will not have a significant adverse effect on the NHA or pNHA; and</i> b) <i>To identify and afford appropriate protection to any new, proposed or modified NHA's identified during the lifetime of the Development Plan;</i>	The likely direct and indirect significant effects of the Proposed Development on NHAs and proposed NHAs was assessed in Chapter 6 Biodiversity. It concluded there would be no significant residual effect from the Proposed Development on NHAs and proposed NHAs.
CDP15.12 Biodiversity and Habitat Protection <i>It is an objective of Clare County Council:</i>	The EIAR Chapter 6 Biodiversity assessed the likely significant direct and indirect effects that the Proposed Development may

Clare County Development Plan 2023-2029 – Development Objective	Development Contribution
a) To protect and promote the sustainable management of the natural heritage, flora and fauna of the County both within protected areas and in the general landscape through the promotion of biodiversity, the conservation of natural habitats, the enhancement of new and existing habitats, and through the integration of Green Infrastructure (GI), Blue Infrastructure and ecosystem services including landscape, heritage, biodiversity and management of invasive and alien species into the Development Plan; b) To promote the conservation of biodiversity through the protection of sites of biodiversity importance and wildlife corridors, both within and between the designated sites and the wider Plan area; c) To support the implementation of the All Ireland Pollinator Plan, National Biodiversity Action Plan and National Raised Bog SAC Management Plan; d) To ensure there is no net loss of potential Lesser Horseshoe Bat feeding habitats, treelines and hedgerows within 2.5km of known roosts; e) To implement and monitor the actions as set out in the Clare County Biodiversity Plan; and f) To promote biodiversity net gain in any new plans/projects/policies to promote development that leaves biodiversity in a better state than before.	have on Terrestrial Ecology, including habitats, flora, invertebrates, mammals and birds. Bat surveys undertaken at the Proposed Development in 2024 recorded no Annex II species lesser horseshoe. Taking into account the results of surveys undertaken, the modified nature of the site resulting from turbary and agricultural management, general lack of roosting opportunities and considering its local context, the study site is considered to be of Local Importance (Lower Value) for bats. It concluded the Proposed Development will not have any significant residual effects on Biodiversity and there will be no net loss of biodiversity associated with the Proposed Development.
CDP16.8 Sites, Features and Objects of Archaeological Interest <i>It is an objective of Clare County Council:</i> a) To safeguard sites, features and objects of archaeological interest generally;	The likely direct and indirect significant effects of the Proposed Development were assessed in Chapter 14 Cultural Heritage. The assessment concluded there will be no

Clare County Development Plan 2023-2029 – Development Objective	Development Contribution
<i>b) To secure the preservation (i.e. preservation in situ or in exceptional cases preservation by record) of all archaeological monuments included in the Record of Monuments and Places as established under Section 12 of the National Monuments (Amendment) Act, 1994, and of sites, features and objects of archaeological and historical interest generally;</i> <i>c) In securing such preservation, to have regard to the advice and recommendations of the Department of the Culture, Heritage and the Gaeltacht;</i> <i>d) To have regard to the government publication Framework and Principles for the Protection of the Archaeological Heritage 1999 in relation to protecting sites, features and objects of archaeological interest; and</i> <i>e) To advocate for greater financial assistance for the maintenance and improvement of features of archaeological interests in County Clare.</i>	predicted significant (direct, indirect or cumulative) effects on the Cultural Heritage resource arising from the Development have been identified.

3.7 **Clare Wind Energy Strategy**

The proposed development would help Clare County Council to achieve many of the objectives and policies set out in their CDP and the Climate Action Plan 2024. The site is located in an area that is classed as **“Open to Consideration”** for wind development. If consented, it would aid in achieving international, European, national and local objectives regarding renewable energy and reductions of CO₂ emissions in the fight against climate change.

The Clare County Development Plan 2023-2029 designates provisions for renewable energy and associated infrastructure and indicates that the site of the proposed development is located in an area ‘open for consideration (wind energy)’.

Section 1 of the Clare Wind Energy Strategy notes that ‘in preparing the current strategy landscape and visual considerations...a balance is now sought between achieving greater energy security, achieving commitments at national and international level regarding reductions in greenhouse gases, promoting renewable energy and other environmental considerations.’

An EIAR and NIS has been carried out as part of the revised application and all environmental aspects have been assessed. The evidence presented therein supports the conclusion that the proposed development in Moanmore Lower would not significantly impact the environmental visual or residential amenity of the area. Furthermore, it complies with proper planning and sustainable development for the area.

Chapter 4 of The EIAR sets out the full suite of planning policies relevant to the Development and provides an overview of the international, national and regional legislation and policy of relevance, as well as a detailed review of the planning policy framework within which the application will be assessed.

Specific policies aimed at meeting the objectives of the Climate Action Plan 2019 (which has since been updated to the 2024 plan which has more ambitious targets) are outlined in Chapter 2 of the CDP and are CDP2.1, CPD2.5 and CDP2.14.

The proposed development would help Clare achieve many of the objectives and policies set out in their CDP and the Climate Action Plan 2024. The site is located in an area that is classed as **“Open to Consideration”** for wind development, it would aid the country and

County Clare in achieving its aims regarding renewable energy and reductions of carbon dioxide (CO₂) emissions in the fight against climate change.

An EIAR and NIS has been prepared as part of the application and all environmental aspects have been assessed. It can be considered that the development would also not seriously injure the environment or visual or residential amenity of the area and could therefore be considered to be in accordance with the proper planning and sustainable development of the area.

The general wind energy objectives for wind energy developments as set out in the Clare Wind Energy Strategy 2023-2029 are detailed in Table 3.3.

Table 3.3 Clare Wind Energy Strategy 2023-2029 – General Objectives for Wind Energy Developments

Clare Wind Energy Strategy 2023-2029 – General Objectives	Development Contribution
WES One: Development of Renewable Energy Generation <i>It is the objective of the Council to support, in principle and in appropriate scales and locations, the development of wind energy resources in County Clare. It is an objective of the Council to ensure the security of energy supply by accommodating the development of wind energy resources in appropriate areas and at appropriate scales within the County.</i>	The Proposed Development is a sustainable on-shore renewable energy development and is located in an area designated 'Open to Consideration' in the Clare Wind Energy Strategy 2023-2029.
WES Two: Development of Low Carbon Economy <i>County Clare will seek to promote itself as moving towards becoming a low carbon County by 2017 as a means of attracting inward investment to the County and the wider Mid West region.</i>	The Proposed Development will support in the development of a Low Carbon Economy in County Clare by reducing greenhouse gas emissions through increased production of renewable energy in the county. The Proposed Development supports County Clare's Climate Change Adaptation Strategy 2019-2024. The proposed Development will displace

Clare Wind Energy Strategy 2023-2029 – General Objectives	Development Contribution
	8,389 tonnes (lower range) or 10,478(higher range) of CO ₂ per annum produced by largely carbon-based traditional energy production.
WES Three: County Partnership Approach <i>Clare County Council will seek to promote wind energy in appropriate sites in the County and will work with agencies such as the Clare County Development Board, Clare Enterprise Board, Limerick Clare Energy Agency, Shannon Development, I.D.A and Enterprise Ireland to encourage investment in research and technology associated with wind farms and other renewable energy technology.</i>	The Proposed Development site is in an area designated ‘Open to Consideration’ in the Clare Wind Energy Strategy 2023-2029.
WES Four: Response to National Policy <i>The White Paper on Energy has set a target of 40% of electricity to be generated from renewable sources by 2020. In the Mid-West Regional Climate Strategy, County Clare is identified as having a potential 600MW energy produced from renewables by 2020.</i> <i>Clare County Council will aim to achieve a minimum target of 550MW from wind energy by the conclusion of this Strategy.</i>	The Proposed Development: Is anticipated to have the capacity to generate between 12-15MW of renewable wind energy to the national CAP2024 and CAP2025 target of 9GW by 2030, helping to reduce the current 4.2GW shortfall. Contributes to the mandatory 42.5% overall renewable energy target by 2030 for the EU introduced by the REDIII. Contributes to assisting Ireland to increase from 42% electricity produced by renewable sources in 2020 to 80% by

Clare Wind Energy Strategy 2023-2029 – General Objectives	Development Contribution
	2030 to meet the national target. Complies with the Regional Spatial and Economic Strategy for the Southern region's goal of prioritizing action on climate change across all strategic areas and in all economic sectors.
WES Five: Promotion of Community Involvement <i>Clare County Council will seek to promote community involvement and require community benefit where possible in Wind farm developments.</i>	The Proposed Development will be a significant regional project providing a sizable economic benefit through local investment, employment, local authority rates, and a local community benefit funds in accordance with Government, regional and local planning policies. The community benefit fund associated with the Development would amount to an average of € 74,372 per annum.
WES Six: Infrastructure Development <i>Proposals for the development of infrastructure for the production, storage and distribution of electricity through the harnessing of wind energy will be considered in appropriate sites and locations, subject to relevant policy, legislation and environmental considerations.</i>	The Proposed Development site is in an area designated 'Open to Consideration' in the Clare Wind Energy Strategy 2023-2029.

Clare Wind Energy Strategy 2023-2029 – General Objectives	Development Contribution
WES Seven: Natura 2000 Sites <i>Having regard to the provisions of the Habitats Directive 92/43/EEC, where a proposed development will give rise to significant adverse direct, indirect or secondary impacts on Natura 2000 sites, (either individually or in combination with other plans or projects), permission will only be granted where there is no alternative solution and where there are imperative reasons of overriding public interest in favour of granting permission, including those of a social or economic nature.</i>	An Appropriate Assessment and NIS have been prepared for the Proposed Development. The NIS concluded “The assessment carried out in this report confirms, with no reasonable scientific doubt, that the proposed Project will not adversely affect the integrity of any of the relevant European sites, namely the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA, either individually or in-combination with other plans and projects.”

3.8 **Principle of Development**

There are two existing wind farms in the same area, Tullabrack Wind Farm and Moanmore Wind Farm. Although these developments predate the current Clare County Development Plan, they establish the pattern of development in the area.

4 **MATERIAL PLANNING CONSIDERATIONS**

The planning application should be considered on the basis of the proper planning and sustainable development of the area and on the likely effects of the Proposed Development on the environment. The EIAR concluded that the proposed Development will have no significant effects on population and human health, biodiversity, aquatic ecology, soils and geology, hydrology and hydrogeology, noise and vibration, landscape and visuals, air quality and climate, archaeology and cultural heritage, material assets and traffic and Transport.

The NIS concluded on the basis of the assessment set out in this NIS, it is respectfully submitted that the competent authority is able to determine that no reasonable scientific

doubt remains that the Proposed Project will not adversely affect the integrity of any European site, in view of the conservation objectives of that site.

4.1 **The National Interest and Strategic Importance**

The Proposed Development will make a valuable contribution to climate change adaptation and greenhouse gas reductions as part of the international (Section 3.2) and European (Section 3.3) efforts to combat climate change.

Ireland is facing significant challenges in efforts to meet renewable energy and emissions targets and is falling behind in the longer-term movement away from fossil fuels (Section 3.4). Ireland has one of the highest rates of importing fuel in Europe with imported dependency increasing to 81.6% in 2022 according to the SEAI²³. Energy demand in Ireland has been growing and is expected to continue to increase, especially electricity demand which is expected to grow by 37% to 2031²⁴. Increases to the cost of carbon, supply issues and potential political insecurity increases fossil fuel price volatility. Since the Russian invasion of Ukraine, energy prices in Ireland have increased significantly. The SEAI's Electricity Prices in Ireland Report; January to June 2022²⁵, found on average residential electricity prices increased 10.4% in the 12 months prior to June 2022. Concern over energy costs amongst the population of Ireland is high, a survey by the Journal in October 2022²⁶ found that 77% of people said that they already or intend to use their home heating less often. The Economic and Social Research Institute (ESRI)²⁷ report on Energy Poverty published in 2022, has also warned that as many as 43% of households could now be in energy poverty, defined as when more than 10% of the household's income is spent on electricity and gas bills. Approximately 850MW of installed wind energy capacity is generated in Wind Farms in Ireland that will reach the end of their planning permissions or will have to be decommissioned between now and 2030. A recent report from Wind Energy Ireland²⁸ finds that between now and the end of 2030, Ireland may lose around a fifth of the total installed onshore wind energy capacity. This means that at a time when we should be accelerating towards our Climate Action Plan targets by increasing installed wind energy, we may end up in a position to fall backwards.

²³ SEAI. (2023). ENERGY IN IRELAND. Available [here](#) Accessed 18/12/2024

²⁴ EirGrid. (2022). EirGrid's Generation Capacity Statement Predicts Challenging Outlook for Ireland <https://www.eirgridgroup.com/newsroom/eirgrids-generation-capacity/#:~:text=The%20GCS%2C%20in%20its%20median,relatively%20consistent%20across%20the%20decade.> Accessed 18/12/2024

²⁵ SEAI. (2022). <https://www.seai.ie/publications/SEAI-EPR-data-for-JAN-to-JUN-2022.pdf> Accessed 18/12/2024.

²⁶ The Journal. (2022). Cost of living crisis: Most households intend to use their home heating less often this winter <https://www.thejournal.ie/poll-energy-use-ireland-heating-5891701-Oct2022/> Accessed 18/12/2024

²⁷ ESRI. (2022). Energy poverty at highest recorded rate <https://www.esri.ie/news/energy-poverty-at-highest-recorded-rate> Accessed 18/12/2024

²⁸ WEI. (2024) Repowering Ireland. <https://windenergyireland.com/images/files/final-repowering-ireland-report-june-2024.pdf>. Accessed 25/09/24

The high rate of imported fossil fuel dependency, the increasing demand for electricity, existing wind farms reaching the end of their operating life and current energy price volatility make it vital to introduce more domestic renewable energy generation plants, such as the Proposed Development to provide reliable, secure and affordable energy supplies in Ireland. The Proposed Development improves Irish energy security and will reduce reliance on imported fossil fuels in line with the National Energy Security Framework (3.4.6) and the REPowerEU Plan (Section 3.3.2).

The construction of the Proposed Development will also positively contribute to the regional economy bringing investment and jobs during the construction, operations and decommissioning that will help to support and retain confidence in the key regional industries of construction and renewable energy.

4.2 Economic Importance of the Proposed Development

The Proposed Development would represent a strategically significant investment in the locality of Clare and the wider southern region. The Proposed Development will provide a significant economic benefit to both the Irish and local economies. The Proposed Development provides the opportunity to reinforce the existing local renewable energy industry knowledge and skills base, providing the stability and diversity to the rural economy that can stimulate further industry investment to take place.

The influence of the Proposed Development to the de-carbonisation of the electricity network will contribute positively to an issue of strategic social importance. This is illustrated by the text of the Irish government's recent Climate Action Plan 2024 which sets an ambitious 80% target for electricity production from renewable sources by 2030 and highlights the need to remove barriers to the development of renewables, including onshore wind, such as streamlining regulation and encouraging reinforcement of the grid to facilitate greater renewables penetration. The significance of the action plan is underlined by the Irish government's 2019 declaration of a climate emergency.

The RSES recognises and aims to support the many opportunities for wind as a major source of renewable energy. It declares that opportunities for both commercial and community wind energy projects should be harnessed, having regard to the requirements of the 2006 DoHPLG Guidelines on Wind Energy.

As a form of sustainable energy, and with an anticipated output of between 12-15MW, the Proposed Development will contribute to the renewable energy targets in County Clare and in the Southern Regional Assembly Area.

The Proposed Development will be a significant regional project providing a sizable economic benefit through local investment, employment, local authority rates, and a local community benefit funds in accordance with Government, regional and local planning policies.

Wind Energy Ireland produced a report on The Economic Impact of Onshore Wind in Ireland²⁹ which illustrated that the onshore wind industry in 2020 supported over 5000 jobs and by 2030 there is a potential to increase this to over 7000, as shown **Figure 4.1**. The report also outlines the current benefits of onshore wind along with how far Ireland has to go to reach binding targets. Note that the installed capacity needs to nearly double within a ten year period.

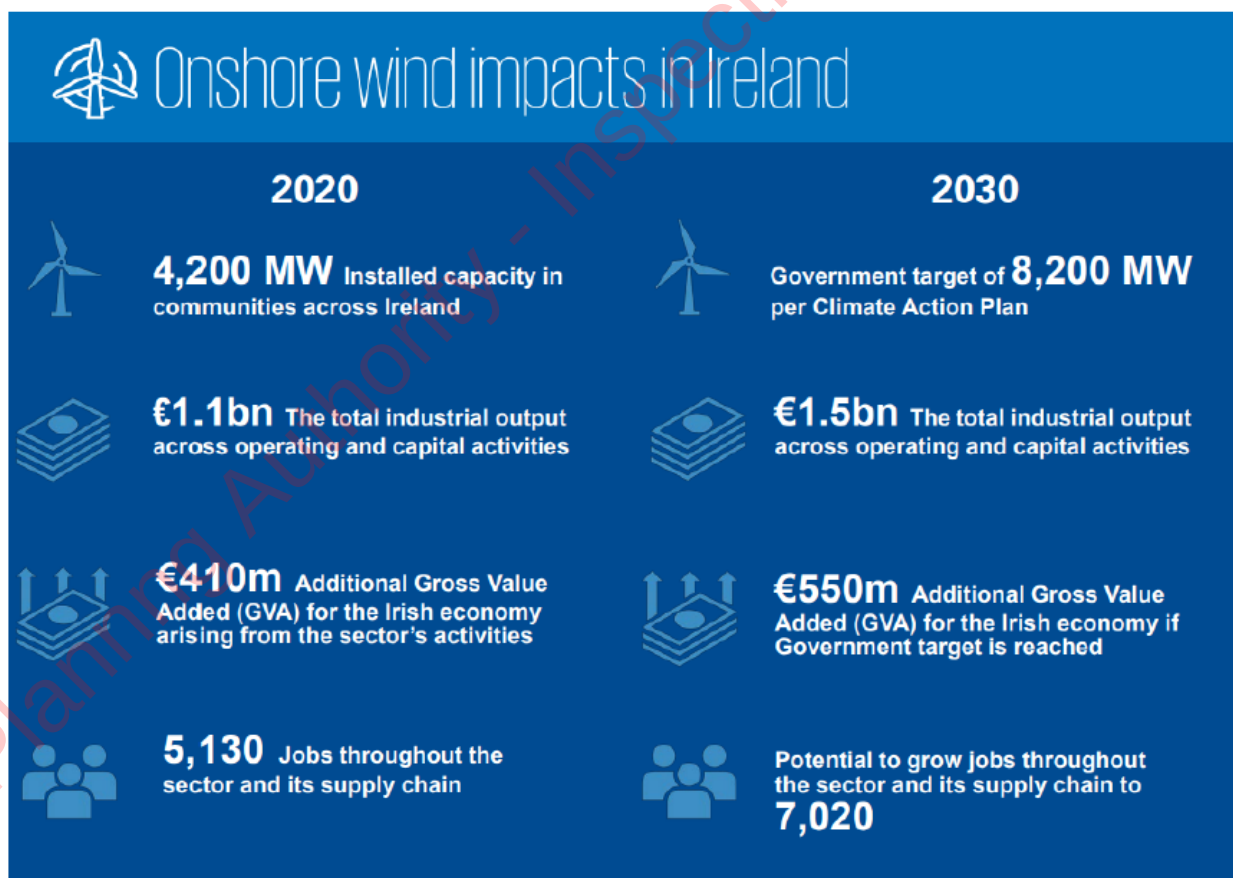


Figure 4.1: Onshore Wind Impacts in Ireland (from the Economic Impact of Onshore Wind in Ireland Figure 1.6)

²⁹ WEI. (2021). The Economic Impact of Onshore Wind in Ireland <https://windenergyireland.com/images/files/economic-impact-of-onshore-wind-in-ireland.pdf> Accessed 01/11/2024

The construction of the Proposed Development will positively contribute to the regional economy bringing investment and jobs that will help to support and retain confidence in the key regional industries of construction and renewable energy. This is assessed in **Chapter 5: Population and Human Health** of the EIAR.

4.3 **The Proposed Development as Sustainable Development**

The Proposed Development is an example of sustainable development, enshrined in the National Planning Framework and in the Revised Draft National Planning Framework. There are three facets to sustainable development which are economic, social and environmental as defined by the UN Sustainable Development Agenda. The Proposed Development meets each of the three facets of sustainable development as laid out in **Table 4.1**.

Table 4.1: The Proposed Development as Sustainable Development

Economic Role	The Proposed Development provides the opportunity to reinforce the existing local renewable energy industry knowledge and skills base by providing new jobs in the industry, providing the stability and diversity to the rural economy that can stimulate further development by attracting new business to the region due to the improved supply of electricity, enabling diversification. The Proposed Development will have a positive economic impact with several Irish firms commissioned to work on the design, environmental assessment and planning. The construction and operational phases will also create jobs locally and nationally and will lead to further economic development. The Proposed Development represents a strategically significant investment in the locality
Social Role	The impact of the Proposed Development to the de-carbonisation of the Irish electricity network is a positive contribution to an issue of strategic social importance. This is illustrated by the Climate Action Plan 2024 which sets an 80% target for electricity production from renewable sources by 2030 and highlights the need to remove barriers to the development of renewables, including onshore wind, such as streamlining regulation and encouraging reinforcement of the grid to facilitate greater renewables penetration. The significance of the action

	plan is further underlined by the Irish government's recent declaration of a climate emergency. The deployment of modern, efficient wind turbine technology, which is currently the cheapest form of new generation, will also contribute to reducing the cost of energy and benefit Irish consumers through lower energy prices. The Proposed Development has the potential to bring significant positive benefits to local communities. It will support sustainable local employment; it will contribute annual rates to the local authority; and it will provide opportunity for local community investment in the project in line with the new Renewable Energy Support Scheme (RESS). This is a Government of Ireland initiative that provides support to renewable energy projects in Ireland. A Community Benefit Fund will be put in place for the RESS period (i.e., 15 years of the operation) of the Project to provide direct funding to those areas surrounding the Project. The significant annual community benefit fund will be established in line with Government policy which will include funding for both wider community initiatives and a Near Neighbour scheme focused on houses in close proximity to the Project. The additional renewable energy that the Proposed Development will generate will help support Ireland's wider low carbon transition. It will help to meet the additional electrical demand that will be created by the electrification of the transport and heating networks and the growing tech industry installations such as data centres.
Environmental Role	The Proposed Development has been assessed in terms of its impact on the environment, where impacts have been identified, the design has been amended and mitigation implemented to avoid, prevent and reduce adverse impacts and maximise positive impacts. Approximately 8,389 to 10,487 tonnes of carbon dioxide will be displaced per annum by the Proposed Development. This helps to mitigate climate change and will have a positive impact on the environment.

	The Biodiversity Enhancement and Management Plan (BEMP) commits to 1. to enhancing an existing area of cutover bog that has been improved for grazing and is now largely dominated by wet grassland with frequent rushes, 2. to enhancing an area of Molinia meadow (Annex I listed) which has been degraded by over-grazing and which has potential to provide habitat suitable for marsh fritillary (Annex II listed) and 3. off-setting the loss of hedgerows by a replanting programme. With the implementation of the Biodiversity and Enhancement Plan, it is considered that the terrestrial ecological interests of the Wind Farm Site will increase during the operational phase of the Proposed Development, <i>i.e.</i> likely long-term Positive effect. There will be no significant effects.
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The Proposed Development has been conceived and designed to align within the planning and sustainable development objectives of the local area. The success of this is documented in comprehensive detail through the EIAR, and illustrated in **Table 4.1** which shows accordance with the provisions of the Clare County Development Plan.

The planning application shows that the Proposed Development provides an excellent opportunity to stimulate continued and additional investment to maximise beneficial impact towards national targets, while also minimising the resulting environmental effects.

5 **SUMMARY AND CONCLUSION**

Throughout this Planning Statement, renewable energy is identified as being required to play a vital role in mitigating climate change by transitioning to a low carbon economy and society. By investing in renewable energy, Ireland can promote sustainable economic development using its own, secure and clean energy.

All planning applications have to be determined on their individual merits with due consideration given to the overall planning balance of a scheme. The pressing need to address climate change, the challenges to energy security giving rise to the adoption of Regulation (EU) 2022/2577 as amended, and RED III and the renewable energy policy adopted at a European, national, regional and local level, provides strong policy support for renewable energy development. The Proposed Development contributes to supplying the national demand for renewable energy, which in the context of the ongoing climate emergency is an urgent Irish national priority.

While renewable energy in Ireland has come a long way, there is still a shortfall in where the nation needs to be to achieve increasing targets. There is a clear national mandate to accommodate significant onshore wind within the next decade with The Climate Action Plan 2024 and 2025 setting a 9GW target for installed wind energy capacity by 2030. In 2023, installed onshore wind capacity in Ireland reached 4.78GW³⁰, leaving a shortfall of 4.2GW to be achieved in 7 years.

The Proposed Development also meets the UN's definition of Sustainable Development in terms of the three sustainability pillars; Economy, Environment and Social.

This Planning Statement outlines how the Proposed Development is compliant with International, European and National policy on energy security, emissions reductions and renewable energy production. It reviews policy for the Southern region and local Clare County policies and finds the Proposed Development complies with key renewable energy, landscape and environmental policy objectives. In this regard, the Proposed Development:

- Is in an area designated '**Open to Consideration**' in the Clare County Development Plan (CDP) 2023-2029.
- Is anticipated to have the capacity to generate between 12-15MW of renewable wind energy to the national CAP2024 and CAP2025 target of 9GW by 2030, helping to reduce the current 4.2GW shortfall.

³⁰ Statista (2023). Onshore wind energy capacity in Ireland 2008-2023. Available [here](#). Accessed 18/12/2024.

- Contributes to the mandatory 42.5% overall renewable energy target by 2030 for the EU introduced by the REDIII.
- Contributes to assisting Ireland to increase from 42% electricity produced by renewable sources in 2020 to 80% by 2030 to meet the national target.
- Complies with the Regional Spatial and Economic Strategy for the Southern region's goal of prioritizing action on climate change across all strategic areas and in all economic sectors.
- Supports the local Clare County Development Plan policy of increasing energy security and promoting renewable energy.
- Aligns with the Clare County Development Plans' requirements with respect to water quality, landscape, biodiversity or amenities, and cultural heritage.
- Contributes to rural economic development in line with the Clare CDP.

The development process adopted by the Applicant has represented a best practice approach to a renewable energy scheme design, minimising the potential impact on the receiving environment through multiple design iterations. The proposed layout represents the optimum fit with the technical and environmental parameters of this project and this site. Furthermore, the embedded mitigation, mitigation by avoidance and reduction and compensation through management and restoration of degraded habitats as outlined in the EIAR, CEMP and Biodiversity Enhancement Management Plan are considered to adequately mitigate the predicted environmental effects.

Overall, it is considered that the Proposed Development aligns with international, European, national and local policy.