Planning and Environmental Consultants

Environmental Impact Assessment Report (EIAR)

Taurbeg Wind Farm Extension of Operational Life

Chapter 2: Background to the Proposed Project

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2. BACKGROUND TO THE PROPOSED PROJECT

This chapter of the Environmental Impact Assessment Report ('EIAR') presents information on renewable energy policy, climate change policy, biodiversity and nature restoration policy, and the strategic, national, regional and local planning context for the Proposed Project. This chapter also summarises the planning history, the scoping and consultation undertaken, as well as setting out the cumulative impact assessment process.

2.1 Introduction

The existing Taurbeg Wind Farm comprises 11 no. turbines with an overall ground-to-blade tip height of 108.2m, 38kV substation and all associated infrastructure. The wind farm is located approximately 3.5km south of Rockchapel and 10.5km northwest of Newmarket, County Cork, in the townlands of Glasheenanargid, Taurbeg and Taurmore. The existing wind farm and substation are accessed via the wind farm site entrance off an unnamed local road, in the townland of Taurbeg and is served by a network of existing wind farm access roads. Other land-uses within the site include private forestry, peat bogs and agricultural lands. The approximate grid reference location for the centre of the site is ITM 522519, 611858.

The existing turbines onsite will have reached the end of their permitted operational life in 2026, however they will have only been operating for a period of 20 years, despite the normal operational life of a turbine being more than this i.e. beyond a 30 year lifespan, as turbine technology and reliability continues to improve, and with strategic replacement of key components such as gearboxes, blades, sensors and electricals. The Bonus (now Siemens) SWT-2.3-82 turbines, of which 11 no. are present and operating on the Site, were commissioned in March 2006.

The Proposed Offsetting Lands are located in the townlands of Coom and Knockatee, County Kerry, approximately 8km east of Castleisland, and approximately 11.5km west of the Taurbeg Wind Farm Site. Current land-use within the Proposed Offsetting Lands is comprised predominantly of agricultural land and commercial forestry.

This chapter of the EIAR presents the policies and targets which have been put in place at the various levels of Government, at regional, national and international level in relation to renewable energy and climate change, and biodiversity and nature restoration. In the context of the current energy and climate crises, it is deemed the most environmentally prudent option to apply to extend the operational life of the existing turbines, rather than allow them to be decommissioned. The details below set out the need for the Proposed Lifetime Extension to assist the country in meeting its national targets and European commitments in relation to climate change, including decarbonisation and elaborates on the need for the development, as set out in Chapter 1: Introduction of this EIAR. This chapter also includes biodiversity and nature restoration policy, targets and commitments in relation to the Proposed Offsetting Measures.

2.1.1 Statement of Authority

MKO has developed extensive expertise and experience over the last 15 years in preparing Background and Planning Policy Context Chapters for a range of projects, including multiple large scale wind energy developments.

This chapter was led by Meabhann Crowe MRTPI with support from Mike Amiel Mekell RTPI Licentiate, of MKO. Meabhann Crowe is a Renewables Project Director with MKO with over 15 years private sector experience. She is a fully chartered member of the Royal Town Planning Institute

(MRTPI). Meabhann holds a BA (Hons) in Geography, Sociological and Political Science and a Master's in Urban and Regional Planning. In her time in the industry Meabhann has been active on a number of instructions across a broad spectrum of mixed-use, residential, commercial, renewable energy and retail projects. Meabhann brings particular expertise in initial development feasibility appraisals and development strategies. Her experience in managing large multi-disciplinary teams in the preparation of local and major planning applications across residential, mixed-use, renewable energy and retail developments means she has a wealth of knowledge to draw on in the early stages of development. She has particular experience in preparing and managing project strategies which include both responding to emerging planning policy whilst also preparing and progressing complex planning applications and appeals.

Mike Amiel Mekell is a Planner with MKO having joined the company in June 2024. Mike holds a BA (Hons) in Politics, International Relations and Sociology from University College Dubin and an MSc (Hons) in Planning and Development from Queen's University Belfast. He is a Licentiate of the Royal Town Planning Institute. Since joining MKO, Mike has been involved in a range of renewable energy projects including onshore wind, solar and grid infrastructure developments. His main responsibilities include preparing planning application documents and reports, preparing inputs for Environmental Impact Assessment Reports and liaising with multidisciplinary project teams.

This chapter was reviewed by Sean McCarthy MRTPI and Eoin McCarthy of MKO. Sean McCarthy is a Project Director in the Planning Team at MKO with over 10 years of experience in both private practice and local authorities. Sean holds a BSc. (Hons) in Property Studies from ATU and a Masters in Regional & Urban Planning for Heriot Watt University in Edinburgh. Prior to taking up his position with MKO in September 2015, Sean worked as a Planning Officer with the Western Isles Council in Scotland in the UK and prior to that worked as a Graduate Planner with Tipperary County Council. Sean is a chartered member of the Royal Town Planning Institute with extensive experience in residential, commercial, industrial, quarries and healthcare development projects. Sean has been involved in complex and large-scale development projects from inception through to planning permission both as a project manager and working as part of wider design teams. Sean has extensive experience in working on Strategic Housing Development Projects/Large Scale Residential Development Projects and EIAR projects. Within MKO, Sean plays a large role in the management and confidence building of junior members of staff and works as part of a large multi-disciplinary team to produce planning applications.

Eoin is a Project Director within the Environment Renewables team of MKO with over 14 years of environmental consultancy experience. Eoin holds a B.Sc. (Hons) in Environmental Science from NUI, Galway. Eoin took up his position with MKO in June 2011. Eoin's key strengths and areas of expertise are in project management, environmental impact assessment, wind energy site selection and feasibility assessment. Since joining MKO, Eoin has progressed from Graduate to Project Director level and has been heavily involved on a significant range of energy infrastructure, tourism, waste permit, flood relief scheme and quarrying projects. He has overseen the design phase and applications of some of the largest wind energy projects in Ireland. In his role as project manager, Eoin works with and co-ordinates large multidisciplinary teams including members from MKO's Environmental, Planning, Ecological and Ornithological departments as well as sub-contractors from various fields in the preparation and production of EIARs. Eoin is also involved in the development of project strategy for the projects that he manages. He has held the role of project manager and EIAR co-ordinator on almost 1GW worth of wind energy projects. Within MKO Eoin plays a large role in the management of and sharing of knowledge with junior members of staff and works as part of a large multi-disciplinary team to produce EIA Reports.

2.1.2 Planning History of the Existing Taurbeg Wind Farm

The existing Taurbeg Wind Farm comprises 11 no. Bonus (now Siemens) SWT-2.3-82 turbines, of 2.3 Megawatts (MW) each, with an overall blade to tip height of 108.2 metres. The existing Taurbeg Wind Farm became operational in 2006 and is connected to the national electricity grid at the existing

Glenlara 110kV Substation, located in County Cork. It should be noted that the grid connection does not form part of the accompanying Proposed Lifetime Extension planning application to Cork County Council (CCC) and is assessed as a cumulative project only within this EIAR.

The existing Taurbeg Wind Farm was permitted under 4 no. separate planning applications:

Table 2-1: Planning History of the existing Taurbeg Wind Farm

Applicant	Pl. Ref. No.	Decision Date	Description	Decision
Wind Farm Developments Ltd.	98/1483	05/7/1999	15 no. turbines transformers, 2 meteorological masts, access tracks, gates, control building, signs and ancillary works	Conditional Grant
ESB	01/6549	06/03/2002	Planning permission for 38 kV overhead line	Conditional Grant
Wind Farm Developments Ltd.	02/3608	07/04/2003	14 turbines, anemometer mast, control room/substation, temporary site compound/control room, access tracks and ancillary works	Conditional Grant
Taurbeg Ltd.	05/602	09/05/2005	Borrow pit to win road stone for on-site access tracks associated with construction of wind farm permitted under Reg. No.02/3608, and a short section of access track	Conditional Grant

An Environmental Statement (ES) was prepared to accompany the original application CCC Pl. Ref. N/02/3608. Planning permission was granted by CCC for the Taurbeg Wind Farm on the 7th of April 2003. The existing Taurbeg Wind Farm has been operational since March 2006, with the current planning permission set to expire in 2026. Planning condition no. 7 of the existing permission states:

> "*The structures shall be removed at the expiration of a period of 20 years beginning on the date of commissioning of the development.*"

The existing turbines are therefore due to be decommissioned in 2026. By this date, the existing turbines will have been in operation for only 20 years.

2.2 Renewable Energy Resources

It is well accepted now that fossil fuels are a finite resource and becoming increasingly scarce and expensive to extract. Renewable energy resources on the other hand offer a sustainable alternative to this dependency on fossil fuels and are continuously replenished through the cycles of nature. The previously adopted gradual shift to increasing our use of renewable energy is no longer viable. There is a renewed sense of urgency, exhibited at all policy levels, to ensure real change happens on the ground. Ireland's dependency on the importation of fossil fuels to meet its energy demands - 70% of energy is currently imported from abroad[1] – highlights a vulnerability in ensuring security of supply and price stability of energy. As such, maintaining and expanding indigenous renewable energy supply is critical.

2.3 Climate Change Policy and Targets

[1] *National Energy Security Framework (April 2022) https://www.gov.ie/pdf/?file=https://assets.gov.ie/221399/86cb99f5-58e3-4821-bc4c-e1bb1fa706fb.pdf#page=null*

International and national policy consistently identifies the need to reduce greenhouse gas (GHG) emissions and stresses the importance of reducing global warming. The context of international policy has altered over the last 30-years from being of a warning nature to the current, almost universally accepted belief, that there is a climate change emergency occurring both within Ireland and at a broader global scale. The Intergovernmental Panel on Climate Change (IPCC)'s Sixth Assessment Report[1] published in 2021 provides a stark assessment of global climate change and presents evidence that climate changes will increase in all regions of the globe over the coming decades and that much of the damage caused by climate change up to this point is now likely irreversible, such as the rise in sea levels over the 21st century.

"*The Status of Ireland's Climate 2023*"[2] published by Met Éireann similarly reflects on clear and distinct impacts arising from climate change effects within an Irish context:

- *"2023 was the warmest year on record for Ireland (record length 124 years).*
- *For the first time, Ireland's average annual temperature rises above 11 °C.*
- *2023 saw the warmest June on record.*
- *2023 saw the wettest March and the wettest July on record.*
- *For the first time in 23 years, four months of the year were within their top 5 warmest months on record (average stays between one and two months every year since the year 2000)."*

The IPCC, the United Nations (UN) body for assessing the science surrounding climate change, have noted in their Sixth Assessment Report in 2023 that a climate catastrophe is inevitable, but rather, there remains a 'narrow path' to determine the future course of climate, mainly by cutting emissions down to net zero. The Proposed Lifetime Extension will continue to contribute to the decarbonisation of the energy sector and reduce harmful emissions. In this regard, it is in compliance with national and international climate change policy and targets.

The World Meteorological Organisation's published their *'State of the Global Climate Report'* on the 19th of March 2025, according to the report:

- The global mean near-surface temperature in 2024 was 1.55 °C ± 0.13 °C above the pre-industrial 1850-1900 average.
- 2024 was the warmest year in the 175-year observational record, surpassing the previous warmest year, 2023 at 1.45 °C ± 0.12 °C above the pre-industrial 1850–1900 average.
- Each of the past 10 years, 2015-2024 were individually the ten warmest years on record for global mean temperature.
- Ocean heat content reached the highest level in 2024, the highest level in the 65-year observational record, surpassing the previous highest level in 2023.
- A new record for ocean heat content has been set each year, over the past 8 years.
- Over the past two decades, 2005-2024, the rate of ocean warming was more than twice that observed between 1960-2005.
- In 2024, the global mean sea level reached a record high in the satellite record (since 1993)
- In the past 10 years, 2015-2024, the rate of global mean sea-level rise was more than twice that observed between the first decade of the satellite record (1993-2002).
- The 18 lowest Arctic sea-ice extent minima all occurred in the past 18 years as per the satellite record.

In Ireland, extreme weather and climate events driven by global warming and climate change are also having major impacts.

[2] *Published 28th December 2023; updated 10th January 2024*

"*Ireland's Climate 2024 Provisional Summary Report"* published by Met Eireann[3], similarly reflects on clear and distinct impacts arising from climate change effects within an Irish context.

- 2024 was noted to be the fourth warmest year on record in Ireland with an average temperature of 10.72° C.
- 2024 was provisionally the 39th wettest year since 1941 with most primary stations recording below-average levels of annual rainfall.
- Further precipitation changes are expected, with a 9% potential decrease in the summer, causing water shortages and impacting agriculture, and a 24% potential increase in winter, elevating the risk of flooding in various regions.
- Seven named storms impacted Ireland in 2024, with Storms Isha and Darragh both producing particularly violent storm-force winds.

The Proposed Lifetime Extension will continue to support Ireland's ambition to reduce reliance on imported fossil fuels for electricity generation, which will in turn reduce the amount of GHGs being emitted into the atmosphere, limiting global warming.

2.3.1 International Climate Policy

United Nations Framework Convention on Climate Change

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

Kyoto Protocol

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

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

- New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from 1st January 2013 to 31st December 2020;
- A revised list of 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.

[3] *Ireland's Climate 2024 Provisional Summary Report (Met Eireann, March 2025)*

Conference of Parties (COP)

COP21 Paris Agreement

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

> *"Humanity has emitted 2,560 billion equivalent tons of CO2 since 1750, and we only have a budget of 500 more if we want to limit warming to 1.5°C.*
>
> *By following a trajectory of very low GHG emissions (SSP1-1.9), the threshold of 1.5°C will be reached in the short term, between 2021 and 2040, before being very slightly exceeded (1.6°C anticipated over the period 2041-2060) then respected in the long term (1.4°C anticipated over the period 2081-2100).*
>
> *Everything is not lost, but we must pursue the Paris Agreement's most ambitious goal of limiting warming to 1.5°C."*

An article published by the IPCC on the 6th of October 2018 titled 'Global Warming of 1.5°C, notes the impacts of global warming of 1.5°C above pre-industrial levels and related global GHG emission pathways; in the context of mitigation pathways, strengthening of the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty. This special report is part of an invitation contained in the Decision of COP21 of the UNFCCC to adopt the Paris Agreement and provides an update on the impact of climate change if emissions are not reduced.

COP25 Madrid

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

- There was no uniform consensus between States to raise countries' climate ambitions, e.g. to make increased commitments in light of growing climate change data. Some States were opposed to imposing any obligation on countries to submit enhanced pledges by the following year, arguing it should be each country's own decision. All states were required to submit a review of their commitments for COP 26 in 2020. At the current level of climate targets, within a decade, the objective of the Paris Agreement will no longer be achievable;
- There was no agreement on finalising Article 6 of the Paris agreement, the foundations for international cooperation to combat climate change. The aim was to establish the rules for new international mechanisms for financing and transferring GHG emission reductions; and

- There was no agreement on financing (Green Climate Fund); specifically, relating to both loss and damage caused by climate change.

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

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

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

COP26 Glasgow

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

The key items COP26 sought to achieve are:

- Secure global net zero by mid-century and keep 1.5 degrees within reach;
- Adapt to protect communities and natural habitats;
- Mobilise finance; and
- Work together to deliver.

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

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

- *Over 40 leaders joined the Breakthrough Agenda, a 10-year plan to work together to create green jobs and growth globally, making clean technologies and solutions the most affordable, accessible and attractive option before 2030 – beginning with power, road transport, steel, hydrogen and agriculture.*
- *Over 120 countries covering more than 90% of the world's forests endorsed the Glasgow Leaders' Declaration on Forests & Land Use committing to work collectively to halt and reverse forest loss and land degradation by 2030, backed by the biggest ever commitment of public funds for forest conservation and a global roadmap to make 75% of forest commodity supply chains sustainable.*
- *A Just Energy Transition Partnership was announced to support South Africa's decarbonisation efforts; a powerful example of collaboration between an emerging economy and international partners.*
- *The launch of the Global Methane Pledge saw over 100 countries committing collectively to reduce global methane emissions by 30% by 2030."*

COP27 Egypt

COP27 took place in Sharm el-Sheikh from the 6th of November to the 20th of November 2022. The COP is a supreme decision-making body of the UNFCCC. COP 27 centred around three major topics:

- Closing the emissions gap to keep 1.5°C alive
- Loss and Damage
- Climate Finance

COP27 officially ended on the 18th of November, but due to the nature of negotiations an outcome text and the final press conference was not held until November 20th. The first outcomes of the negotiations of the COP27 agenda were seen in the first draft document. A consolidated final document followed and while it removed much of the vague wording of the draft, it also removed some critical key points, particularly in relation to the strengthening of actions required by developed nations. The most significant outcomes from COP27 are outlined below:

- Phase down/out language: The final agreement contains a commitment to a 'phase down' of coal use, as opposed to a wider commitment to phase out all fossil fuels.
- 1.5°C Pathway: The 1.5°C warming limit has been retained and reassurances have been made that there is no room for backsliding.
- Climate Finance & Loss and Damage: There has been the launch of an initiative by the V20 and G7 known as the Global Shield Against Climate Risk (GSACR). The intention of this initiative has been framed almost as an insurance policy backed by the World Bank to prepare and protect those most vulnerable to climate change disasters.

COP28 United Arab Emirates

The 28th session of the COP to the UNFCCC, was held in Dubai from 30 November to 13 December 2023. The main objective of COP was to assess the progress made by all parties on the implementation of the 2015 Paris Agreement through the concluding phase of the 'global stocktake', which began after COP26 in 2021.

A key outcome from COP28 was the agreement to phase out fossil fuels and increase renewable energy capacity. The agreement calls for a tripling of renewable energy capacity globally by 2030. This was the first time that the COP explicitly addressed the need to end the use of fossil fuels. The agreement was signed by the Irish Government among 116 other nations. The acceleration of the permitting of renewable projects and related infrastructure is identified as a crucial enabler to achieve the renewable energy targets set out under the agreement.

COP29 Azerbaijan

COP29 took place in Baku, Azerbaijan between the 11th and 22nd of November 2024. There was a central focus on climate financing with agreements being reached on tripling finance to developing countries to help them protect their people and economies from climate-related disasters and also sharing the benefits of the boom in renewable energy. Key actions arising from COP29 include:

- Launch of the COP29 Global Energy Storage and Grids Pledge which commits signatories to a collective goal of deploying 1,500 GW of energy storage globally by 2030.
- COP29 Green Energy Pledge: Green Energy Zones and Corridors which promotes the connection of green energy zones and corridors to communities in need through the development of intraregional and interregional interconnected electricity grids.
- Call to action for an equitable and renewable energy transition, and increased renewable energy capacity globally.

Progress was also made on carbon markets and how they will operate under the Paris Agreement. Article 6 of the Paris Agreement allows countries to trade carbon credits, which are produced through reducing GHG emissions, to support other countries to meet their climate goals. Country-to-country

trading and a carbon crediting mechanism have been made fully operational through agreements at COP29.

European Green Deal – European Climate Law (2021)

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

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

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

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

The law aims to ensure that all EU policies contribute to this goal and that all sectors of the economy and society play their part. All 27 no. EU Member States have committed to turning the EU into the first climate neutral continent by 2050. One third of the 1.8 trillion-euro investments from the Next Generation EU Recovery Plan, and the EU's seven-year budget, will finance the European Green Deal. On 14th July 2021, the European Commission adopted a set of proposals[5] to make the EU's climate, energy, transport and taxation policies fit for reducing net GHG emissions by at least 55% by 2030, compared to 1990 levels.

Achieving these emission reductions in the next decade is crucial to Europe becoming the world's first climate-neutral continent by 2050. This milestone will only be achieved through the permitting and construction or continued operation of renewable energy projects, such as the Proposed Lifetime Extension.

2.3.1.2 Proposed Lifetime Extension - Compliance with International Climate Policy

From the review of the relevant policy documents, it is considered that the proposal to extend the operational life of the existing Taurbeg Wind Farm will continue to reduce our reliance on fossil fuels for electricity generation, therefore being wholly in line with the goals of the UNFCCC to limit global temperatures as a result of climate change and the goals of the Kyoto Protocol and the several COP agreements as outlined above.

Goals set out in the European Green Deal – to reach net zero carbon emissions by 2050 – will fail to be achieved if proposals, such as that under consideration here, are not implemented. The continued operation of the wind farm also will aid in ensuring energy security within the EU which is a target of the European Green Deal. As wind is an indigenous and abundant resource, countries can tap into their own wind potential, reducing the vulnerability to price fluctuations and geopolitical risks associated with fossil fuel imports.

2.3.2 National Climate Policy

Programme for Government – Securing Ireland's Future (January 2025)

The Programme for Government 2025 – Securing Ireland's Future (January 2025) places specific emphasis on climate change, recognising that time is critical in addressing the climate crisis. The Programme states that the Government is committed to taking *"decisive action to radically reduce our reliance on fossil fuels and to achieve a 51% reduction in emissions from 2018 to 2030, and to achieving net-zero emissions no later than 2050".*

With regard to renewable energy generation, the Programme notes that the Government is committed to the rapid decarbonisation of the energy sector. The Programme states the Government's ongoing support and commitment to "*achieving 80% of Ireland's electricity generation from renewable sources by 2030"* and to delivering 9GW of onshore wind by 2030.

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

The Climate Action and Low Carbon Development Act 2015 (as amended) ("the Climate Act") legally binds Ireland to achieve net-zero emissions no later than 2050, and to a 51% reduction in emissions by the end of this decade.

The Climate Act provides the framework for Ireland to meet its international and EU climate commitments and to become a leader in addressing climate change. As indicated by the premise of the legislation, the reduction of emissions is a key proponent of the Climate Act and incorporates the following key provisions:

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

A recent judgement of the High court delivered on 10th January 2025, provides clarity on the obligations imposed on public bodies under section 15 of the Climate Act (*Coolglass Wind Farm Limited v An Bord Pleanála [2025] IEHC 1*).

Mr Justice Humphreys undertook a detailed consideration of the interpretation of Section 15 of the Climate Act and concluded that, when deciding upon an application relevant to the achievement of climate plans and objectives under Section15 of the Climate Act, relevant bodies, in this case the Planning Authority, is required to:

1. Consider if the application, if granted, would contribute to achieving climate targets? In the case of renewable energy projects, the answer is invariably yes.
2. Consider whether granting permission is *"precluded by a mandatory and non-fixable legal requirement"* that does give the decision maker any flexibility in reaching an outcome favouring climate goals, i.e. a grant of permission.
3. If the decision maker is not precluded from granting permission, then how can the planning authority use its evaluative judgement and discretion to reach an outcome favouring policy goals.

As part of Mr Justice Humphrey's consideration of the interpretation of Section 15 of the Climate Act, he states in his judgement that "*an immediate end to business as usual is a precondition for planetary survival*".

In summary, Section 15 of the Climate Act requires relevant bodies to engage in its own independent consideration of the impact of a proposed development on the State achieving its climate targets and to exercise its discretion in a manner which supports the achievement of those targets.

It should be noted that on the 20th of May 2025, the Supreme Court granted An Coimisiún Pleanála (formerly An Bord Pleanála) leave to appeal the High Court's decision in the Coolglass case.

The existing Taurbeg Wind Farm contributes to a reduction in emissions, and therefore already serves as an important project in national terms. The proposal to continue its operation is therefore consistent with binding emissions reduction targets at both a European and National level.

Carbon Budgets

To achieve the 51% emissions reduction target, the Climate Act requires the Climate Change Advisory Council (CCAC) to recommend a proposed programme of economy-wide 5-year Carbon Budgets to the Minister for the Environment, Climate and Communications. The first national carbon budget programme proposed by the Climate Change Advisory Council, approved by Government and adopted by both Houses of the Oireachtas in April 2022 comprises three successive 5-year carbon budgets[4]. The total emissions allowed under each budget are shown in Table 2-2 below.

Table 2-2: Carbon Budgets of the Climate Change Advisory Council

	2021 – 2025 Carbon Budget 1	2026 – 2030 Carbon Budget 2	2031 – 2035 Provisional Carbon Budget 3
	All Gases		
Carbon Budget (Mt CO_2eq)	295	200	151
Annual Average Percentage Change in Emissions	-4.8%	-8.3%	-3.5%

[4] *Climate Change Advisory Council Carbon Budget Technical Report (October 2021)* https://www.gov.ie/en/publication/9af1b-carbon-budgets/

	2021 – 2025 Carbon Budget 1	2026 – 2030 Carbon Budget 2	2031 – 2035 Provisional Carbon Budget 3
The figures are consistent with emissions in 2018 of 68.3 Mt CO_2eq reducing to 33.5 Mt CO_2eq in 2030, thus allowing compliance with the 51% emissions reduction target by 2030.			

Section 6C of the Climate Act provides that the Minister shall prepare, within the limits of the carbon budget, the Sectoral Emissions Ceilings. These ceilings set out the maximum amount of GHG emissions that are permitted in each sector. The Government approved Sectoral Emissions Ceilings on 28 July 2022. The electricity sector is allocated a sectoral ceiling of 40 Mt CO2 eq for the first budget (2021-2025) and a sectoral ceiling of 20 Mt CO2 eq for the second budget period (2026-2030). In 2022, the electricity sector emissions were 10.1 Mt CO2 eq[5].

The Environmental Protection Agency (EPA) reported in May 2024[6] that the first two carbon budgets (2021-2030) – which aim to support achievement of the 51% emissions reduction target - would not be met, and by a significant margin of between 17 and 27 per cent.

Climate Action Plan 2023

The Climate Action Plan 2023 ('CAP23') was published in December 2022 by the Department of the Environment, Climate and Communications (DECC). This outlines the actions required to 2035 and beyond to meet Ireland's commitment to becoming carbon neutral by 2050. CAP23 sets out a roadmap to deliver on Irelands climate ambition and is aligned to ensure that Ireland achieves its legally binding target (the Climate Action and Low Carbon Development (Amendment) Act 2021) of net-zero GHG emissions no later than 2050. A target aims for a reduction in emissions of 51% over the period 2018 to 2030 and in doing so, prevent / mitigate the potentially devastating consequences of climate change on Ireland's environment, society, economic and natural resources.

The CAP23 states that to do so, Ireland must harness the untapped indigenous renewable resources and has a target of achieving 80% of energy being produced from renewable sources by 2030 (unchanged from the previous Climate Action Plan, 2022) with a target of 9GW of that being produced by onshore wind. Measures set out in CAP23 to achieve these targets include to 'accelerate and increase the deployment of renewable energy to replace fossil fuels' (Section 12.1.4 CAP23). It is clear from the message and ambition of CAP23 that the drive to deploy renewable energy projects such as the Proposed Project in Ireland are critical to achieving the aims and objectives of CAP23 including the 9GW of onshore wind energy by 2030 and carbon neutrality by 2050.

> *"Achieving these ambitions will require a coordinated effort across Ireland and every economic sector will be involved. It requires no less than a national transformation over the coming years in how we work, travel, heat our homes, source our energy and use our land".*
>
> *"Decarbonisation of the electricity sector is, as noted in CAP23, key to the decarbonisation of other sectors who will depend on electrification including transport, heating and industry. The increase in portion of renewable electricity of 80% by 2023 will come in part from a targeted 9GW of onshore wind. The plan notes: "Achieving further emissions reductions between now and 2030 requires a major step up in how we accelerate and increase the deployment of renewable energy to replace fossil fuels, deliver a flexible system to support renewables, and manage electricity demand".*

Chapter 11 sets out the state of play, targets and actions for the decarbonisation of the Electricity sector. Carbon emissions from electricity have fallen by 45% between 2005 and 2020; a trend largely due to the

[5] *Climate Change Advisory Council Annual Review 2023 (July 2023) https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR-2023-postfinal.pdf*
[6] *https://www.epa.ie/news-releases/news-releases-2024/ireland-is-projected-to-exceed-its-national-and-eu-climate-targets.php*

availability of renewable energy generated electricity (a sixfold increase between 2005 and 2020) and an associated reduction in the use of carbon heavy fuels such as peat and coal.

Due to the scale of the challenge at hand however, and the recognition of the key role of the electricity sector in achieving sector wide targets, the electricity sector has been allocated the smallest carbon budget and will require the steepest carbon emissions decline of all sectors – namely a reduction in carbon emission by -75% relative to 2018 baseline. Carbon budgets 1 and 2 allow for 40.02 MtCO2eq. from the electricity sector up to 2025 and 20 MtCO2eq. from 2026-2030. The SEAI report in their 'First Look: Mid-Year Review of Ireland's Energy and Related Emissions in 2024' publication covering the period January to June 2024 that *"If SEAI's estimate of electricity emissions in the first 6-months of 2024 remains representative of the subsequent 18-months, then the total emissions from the electricity sector in the 5-year period of the first carbon budget will sum to approximately 41 MtCO2e. This would be approximately 1 MtCO2e over the 40 MtCO2e sectoral emission ceiling allowed for electricity to the end of 20251. If this result eventuated, then the sectoral emission ceiling for electricity in the second carbon budget (2026 – 2030) would be limited to 19 MtCO2e. Staying within the second carbon budget would require average electricity sector emissions of no more than 3.8 MtCO2e per year (the average for the first 3-years of the first carbon budget was 9.1 MtCO2e per year)."*

The measures set out for the electricity sector include *inter alia*:

- Reduce annual CO2eq. emissions from the sector to 3 MtCO2eq by 2031 (75% reduction compared to 2018);
- Accelerate and increase the deployment of renewable energy to replace fossil fuels;
- Accelerate the delivery of onshore wind, offshore wind and solar through a competitive framework to reach 80% of electricity demand from renewable energy by 2030;
- Target 6GW of onshore wind and up to 5 GW of solar by 2025;
- Target 9 GW onshore wind, 8 GW Solar and at least 5 GW of offshore wind by 2030;
- Align the relevant constituent elements of the planning and permitting system to support accelerated renewable energy development, supported by national policy and associated methodologies to inform regional and local planning policies, noting that Development Plans are obliged to set out objectives to facilitate energy infrastructure;

Having regard to the targets and measures set out above, it is clear that in the context of more requiring to be done in the climate change sector, a project which already has the benefit of being operational and is already contributing to the active reduction in carbon emissions, such as the Proposed Lifetime Extension, must be considered favourably.

Climate Action Plan 2024

The Climate Action Plan 2024 ('CAP24') builds on CAP23 by refining and updating the status of the actions required to deliver the decarbonisation required under the carbon budgets and sectoral emissions ceilings. The renewable electricity generation targets are unchanged from the CAP23 (9GW of onshore wind & 80% renewable electricity share).

CAP24 includes the latest trends in the electricity sector:

- In 2022, renewable generation accounted for 38.6% of electricity, an increase from 35% in 2021.
- Electricity accounted for 14.4% of Ireland's GHG emissions in 2022.
- To meet the first carbon budget the electricity sector requires a decarbonisation rate of 17.3% per annum in the period 2023-2025. For context, the decarbonisation rate between 2018 and 2022 was 1.4% per annum.

CAP24 acknowledges the urgency and importance of the decarbonising the electricity sector. The plan states:

> *"Given that the programme of large-scale offshore wind deployment is expected to be realised towards end 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."*

The scale of the challenge is apparent when quantified:

> *"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****."*

CAP 24 identifies the alignment of local and national policy as a critical to accelerate renewable energy rollout.

> *"greater alignment between local plans and renewable energy targets at national and regional level to support investment in and delivery of onshore wind and solar renewable energy is also critical".*

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

Climate Action Plan 2025

The Climate Action Plan 2025 (CAP25) represents the third statutory update to Ireland's climate roadmap under the Climate Act. Building on the foundations laid by previous plans, CAP25 refines and strengthens the strategies necessary to deliver Ireland's legally binding carbon budgets and sectoral emissions ceilings. It sets out a clear trajectory to reduce GHG emissions by 51% by 2030 and to achieve climate neutrality no later than 2050.

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

CAP25 recognises that the extension of life of onshore wind energy developments (e.g. the Proposed Lifetime Extension) is critical to ensuring that the target of 80% renewable electricity by 2030 is achieved. The plan states that "*extending the life of and/or repowering existing renewable electricity projects offers an efficient use of established infrastructure and minimises the risk to the security of electricity supply at a time when increasing numbers of existing windfarms are reaching the end of their life.*"

As an existing wind farm with established infrastructure and an existing connection to the national electricity grid, the extension of operational life of the Taurbeg Wind Farm accords with the provisions of CAP25. The Proposed Lifetime Extension will continue to contribute to the current installed capacity of 5GW for onshore wind energy, contributing to the achievement of 80% renewable energy and the delivery of 9GW of onshore wind by 2030.

The Proposed Lifetime Extension will continue to offset Ireland's reliance on imported fossil fuels for electricity generation and contribute to energy security by generating indigenous renewable wind energy.

2.3.2.2 Proposed Lifetime Extension - Compliance with National Climate Policy

The existing Taurbeg Wind Farm is operational and has been since 2006 when it was commissioned. The wind farm has therefore been generating renewable electricity and supplying to the national grid for a period of more than 19 years. The Proposed Lifetime Extension will therefore aid in the overall supply of renewables in the country, therefore it will directly serve to continue generating energy onto the national grid without the need to take account of any construction phase. The renewable energy produced, will help Ireland address the challenge of decarbonising electricity generation as well as addressing the country's over-dependence on imported fossil fuels. Therefore, it is considered that the Proposed Lifetime Extension is in compliance with climate policy.

2.4 Renewable Energy Policy and Targets

2.4.1 European Renewable Energy Policy

Renewable Energy Directive I & II

The Renewable Energy Directive is the EU legal framework for the development of renewable energy across all sectors of the EU economy, supporting clean energy cooperation across EU countries. Since the introduction of the Renewable Energy Directive (RED) in 2009, it has undergone several revisions since then. Since its adoption in 2009, the share of renewable energy sources in energy consumption has increased from 12.5% in 2010 to 23% in 2022. Of the 27 EU member states the lowest proportion of renewable energy in gross final energy consumption was recorded in Ireland (13.1%). Crucially, the Renewable Energy Directive sets the overall target for renewable energy in the EU.

RED I - 2009

Renewable Energy Directive 2009 (RED I - the original RED) (2009/28/EC), adopted in 2009, set binding targets for EU member states to achieve a 20% share of renewable energy in final energy consumption by 2020. It established a framework for national renewable energy action plans, sustainability criteria for biofuels and bioliquids, and a system of guarantees of origin for renewable energy.

RED II – 2018

RED II, the first major amendment to the RED, (2018/2001/EU) entered into force in December 2018, as part of the Clean Energy for all Europeans package. In RED II, the overall EU target for Renewable Energy Sources consumption by 2030 was raised to 32%. RED II is currently in force and applies to the present application and EIA. Given the transposition deadline has passed, the provisions of RED II are now binding on the State and public authorities, including local authorities and An Coimisiún Pleanála.

Repowering is defined in RED II as "***renewing*** *power plants that produce renewable energy,* ***including*** *the full or partial replacement of installations* ***or*** *operation systems and equipment for the purposes of replacing capacity or increasing the efficiency or capacity of the installation*". (Emphasis added).

Article 16(6) states that Member States shall facilitate the repowering of existing renewable energy plants by ensuring a simplified and swift permit-granting process. The length of that process shall not exceed one year.

REPowerEU Plan

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

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

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

Regulation 2022/2577

In recognition of the worsening energy crises arising from Russia's war against Ukraine, the Council of the European Union adopted Regulation (EU) 2022/2577 on 22 December 2022, 'Laying down a framework to accelerate the deployment of renewable energy.' This regulation, which has immediate and direct effect in Member States, applies to "all permit-granting processes that have a starting date within the period of its application" and includes a number of tangible measures aimed at streamlining the permit-granting process and facilitating the accelerated deployment of renewable energy. The period of application of the Regulation was an 18 month period from the 30 December 2022 to 29 June 2024.

> *'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.'*

Central to the Regulation is the presumption that renewable energy development must be considered to be in the overriding public interest when addressing competing interests under the Habitats Directive (92/43/EEC), Birds Directive (2009/147/EEC) and the Water Framework Directive (2006/60/EC) and that renewable energy projects should be given priority when balancing legal interests in a given case – Article 3:

1. *'The planning, construction and operation of plants and installations for the production of energy from renewable sources, and their connection to the grid, the related grid itself and storage assets **shall** be presumed as being in the overriding public interest and serving public health and safety when balancing legal interests in the individual case, for the purposes of Article 6(4) and Article 16(1)(c) of Council Directive 92/43/EEC, Article 4(7) of Directive 2000/60/EC of the European Parliament and of the Council and Article 9(1)(a) of Directive 2009/147/EC of the European Parliament and of the Council....'*
2. *'Member States shall ensure, at least for projects which are recognised as being of overriding public interest, that in the planning and permit-granting process, the construction and operation of plants and installations for the production of energy from*

> *renewable sources and the related grid infrastructure development are given priority when balancing legal interests in the individual case....* (emphasis added)*'*

The Regulation was introduced as a temporary, emergency measure and included provision for the EU Commission to review the application of, and continued need for, the measures included in the Regulation. The Commission completed its review of the Regulation and furnished its report to the Council on the 28 November 2023. In its report the Commission recommended the prolongation of the validity of certain measures in the Regulation, including Article 3(2), and by Regulation 2024/223 of the 22 December 2023 the Council of the European Union, Regulation 2022/2577 was passed which extends the life of certain provisions of the Regulation beyond June 2024 to 30 June 2025 and makes a number of amendments. The amended Regulation applies to the present application and EIA.

Article 3(2) requires priority to be given to renewable energy projects that are recognised as being of overriding public interest whenever the balancing of legal interests is required in individual cases.

The importance, continued need and effectiveness of Article 3(2) of Regulation 2022/2577 in aiding the accelerated deployment of renewable energy is explained in Recital 14 of Regulation 2024/223:

> *'...Article 3(2) of Regulation (EU) 2022/2577 requires priority to be given to projects that are recognised as being of overriding public interest whenever the balancing of legal interests is required in individual cases and where those projects introduce additional compensation requirements for species protection... The first sentence of Article 3(2) of Regulation (EU) 2022/2577 has the potential, in the current urgent and still unstable energy situation on the energy market which the Union is facing, to further accelerate renewable energy projects since it requires Member States to promote those renewable energy projects by giving them priority when dealing with different conflicting interests beyond environmental matters in the context of Member States' planning and the permit-granting process. The Commission's report demonstrated the value of the first sentence of Article 3(2) of Regulation (EU) 2022/2577 which recognises the relative importance of renewable energy deployment in the current difficult energy context beyond the specific objectives of the derogations foreseen in the Directives referred to in Article 3(1) of Regulation (EU) 2022/2577. Given the particularly severe situation in the supply of energy which the Union is currently facing, it is appropriate to prolong the application of Article 3(2) of Regulation (EU) 2022/2577 in order to appropriately recognise the crucial role played by renewable energy plants to fight climate change and pollution, reduce energy prices, decrease the Union's dependence on fossil fuels and to ensure the Union's security of supply in the context of the balancing of legal interests carried out by permit-granting authorities or national courts. At the same time, it is also appropriate to keep the environmental safeguard that, for projects recognised as being of overriding public interest, appropriate species conservation measures, underpinned by sufficient financial resources, are adopted. (emphasis added)'.*

This provision is currently in force under the original Regulation and the amended version is binding on the State under the Amended Regulation from 1 July 2024 to 30 June 2025.

It is submitted that the continued operation of the Taurbeg Wind Farm is strongly supported by EU energy policy. Many of the measures outlined in REPowerEU have been incorporated into national Policy through the National Energy Security Framework, which was published by the Government in April 2022, and discussed in further detail in Section 2.4.1.

Renewable Energy Directive III

RED III – 2023

In November 2023, a revision of the Renewable Energy Directive (RED III), came into force. RED III increases the EU wide renewable energy target from 32% set under the previous revision of the directive

to 42.5%, with an ambition to reach 45% by 2030. The increase was proposed under the publication of the REPowerEU plan in May 2022. The Directive also introduces specific targets for Member States in the industry, transport, and building (district heating and cooling) sectors.

Under RED III, EU Member States must identify areas for the acceleration of renewables where projects will undergo a simplified and fast-track procedure.

Article 16f puts the presumption that renewable energy development must be considered to be in the overriding public interest on a permanent footing. It states that by 21 February 2024 and until climate neutrality is achieved, Member States shall ensure that in the permit granting procedure, the planning, construction and operation of renewable energy plants are presumed as being in the overriding public interest and serving public health and safety when balancing legal interests for the purposes of the Habitats Directive, the Water Framework Directive and the Birds Directive.

These measures came in response to REPowerEU which found that permitting is the biggest bottleneck for deploying wind at scale, with approximately 80 GW of wind power capacity stuck in permitting procedures across Europe. In September 2024 the European Commission opened infringement procedures against Ireland and 25 other Member States for failing to fully transpose the provisions of the revised Renewable Energy Directive relating to the simplification and acceleration of permitting procedures. In response to Oireachtas questioning on the matter, the Minister for the Environment, Climate and Communications noted "*Ireland is supportive of efforts to reduce overall permitting timelines for renewable energy projects. However, the scale and complexity of changes necessary to implement these provisions requires an extensive programme of work. Efforts to reduce permitting timelines have been underway, in this context, for some time. This programme of work includes legislative changes to the planning system to meet the RED III requirements. These are being advanced by the Department of Housing, Local Government and Heritage and the drafting of a Statutory Instrument under the European Communities Act 1972 is at an advanced stage. This SI will amend the Planning and Development Act, as amended, and the Planning and Development Regulations, as amended.*"

At Recital 38 it is acknowledged that *"repowering of existing renewable energy power plants has significant potential to contribute to the achievement of the renewable energy targets" and entails "further benefits such as the existing grid connection, a likely higher degree of public acceptance and knowledge of the environmental impact.".* (Emphasis added)

Article 16b(2) also states that "*Where a renewable energy project has adopted necessary mitigation measures, any killing or disturbance of the species protected under Article 12(1) of [the Habitats] Directive 92/43/EEC and Article 5 of [the Birds] Directive 2009/147/EC shall not be considered to be deliberate.*" (Emphasis added).

The deadline for transposition of this Directive is 21 May 2025. However, an earlier deadline of 1 July 2024 applies under the Emergency Regulation 2022/2577 and applies to the present application and EIA.

Energy Roadmap 2050

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

- High Energy Efficiency;
- Diversified Supply Technologies;

- High Renewable Energy Sources;
- Nuclear energy; and
- Carbon capture and storage.

The analysis found that decarbonising the energy system is technically and economically feasible. The Roadmap notes that all scenarios show the biggest share of energy supply technologies in 2050 comes from renewables. In this regard, it should be noted that the Climate Change Advisory Council states within their 2024 Annual Review that "progress to reduce emissions is not sufficient for Ireland to meet its national and EU climate obligations. Reliance on fossils fuels needs to end, and urgent action is required to ensure that people, places and nature can adapt to the changing climate and prepare for rapidly emerging climate risks. The current rate of policy implementation is too slow and fragmented, and more effective engagement across all segments of policy and society is required to empower sustainable decision-making and to understand and remove barriers to action." As such, a major prerequisite for a more sustainable and secure energy system is a higher share of renewable energy up to and beyond 2030 to 2050. Each of the scenarios assumes in the analysis that increasing the share of renewable energy and using energy more efficiently are crucial, irrespective of the particular energy mix chosen.

2.4.1.2 Proposed Lifetime Extension - Compliance with European Renewable Energy Policy

At a European level, there is a clear upward trend in the revisions of renewable energy targets. With a current target of 42.5%, with an ambition to reach 45% by 2030, it is crucial that every existing renewable energy generator is retained where possible. The existing Taurbeg Wind Farm currently contributes to the 23% of energy currently sourced from renewable energy.

2.4.2 National Renewable Energy Policy

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

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

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

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

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

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

National Energy Security Framework

The Framework (DECC, April 2022) highlights clearly the impacts the Russian invasion of Ukraine and the resulting war has had on Europe's energy system. The resulting decision by the EU to phase out the import of Russian gas, oil and coal (REPowerEU) has brought to the fore the importance of security of supply and how energy policy is designed for long-term resilience. It takes account of the need to decarbonise society and economy, to reduce Ireland's emissions by 51% over the decade to 2030 and reach net zero emissions by 2050. According to the SEAI's Energy in Ireland (2024) report, 55.6% of all energy consumed in Ireland was oil products, mainly diesel, petrol, and heating oils.

The International Energy Agency, of which Ireland is a member country, includes a 10-point plan to cut oil use which calls for an acceleration in the deployment of wind and solar projects. Ireland's response per the Framework is set out over three themes:

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

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

Having regard to the above, it is clear that the provision of renewable energy, such as the electricity produced by the existing Taurbeg Wind Farm, is vital in helping to secure the State's energy supplies and reduce reliance on imported fossil fuels.

Energy Security in Ireland to 2030 – Energy Security Package

Published in November 2023, the energy security package builds on the policies set out in the NESF. The energy security package is based on the recognition of the following fact:

> *"Ireland's future energy will be secure by moving from an oil-, peat-, coal- and gas-based energy system to an electricity-led system maximising our renewable energy potential, flexibility and being integrated into Europe's energy systems."*

The energy security package includes a range of measures to implement this approach by the prioritisation of the following:

1. *Reduced and Responsive Demand.*
2. *Renewables-Led System.*

3. *More Resilient Systems.*
4. *Robust Risk Governance.*

A key finding from the technical analysis conducted as part of the Energy Security Package is the interdependence of energy security on two essential pillars: '*harnessing our indigenous renewable energy resources at speed and at scale and the rapid electrification of energy demand*'. As such, the energy security package provides additional measures to supplement the existing measures introduced under previously published Government policy documents. Those additional measures most relevant to the Proposed Lifetime Extension are as set out in Action 10 of the report, "*To implement Planning and Consenting System Reforms and provide greater certainty to the sector.*"

The Package therefore aims to ensure that the planning system is fully aligned and resourced to fully support accelerated renewable energy development. It also aims to ensure renewable energy projects are prioritised in line with the recast Renewable Energy Directive and RePowerEU.

The Proposed Lifetime Extension supports the Government's objectives in ensuring the State's energy security. This Proposed Lifetime Extension serves as a domestic renewable energy generator capable of providing clean electricity to the national electricity grid, contributing to a renewables-led system.

2.4.2.2 Proposed Lifetime Extension - Compliance with the National Renewable Energy Policy

At a European level, there is a clear upward trend in the revisions of renewable energy targets. With a current target of 42.5%, with an ambition to reach 45% by 2030, it is crucial that every existing renewable energy generator is retained where possible. The existing Taurbeg Wind Farm currently contributes to the 23% of energy currently sourced from renewable energy.

National Energy Policy aims to achieve two main gaols, 1) to decarbonise Ireland's national energy network, and 2) to increase Ireland's indigenous energy supply in order to improve the country's energy security. Taurbeg Wind Farm is an existing, low carbon and indigenous energy supply which provides clean, renewable energy to the national electricity grid. Therefore, the Proposed Lifetime Extension is in accordance with and supported by national energy policy.

2.5 Climate and Renewable Energy Target Progress

At a European level, in 2023 renewable energy sources accounted for 45.3% of gross electricity consumption in the EU, representing an increase from 2022 levels. Wind and hydro power accounted for more than two-thirds of the total electricity generated from renewable sources at 38.5% and 28.2% respectively. According to Eurostat, only a handful of countries were already meeting the 2030 target, with Ireland at 15.25% of overall share of energy being from renewable sources in 2023.

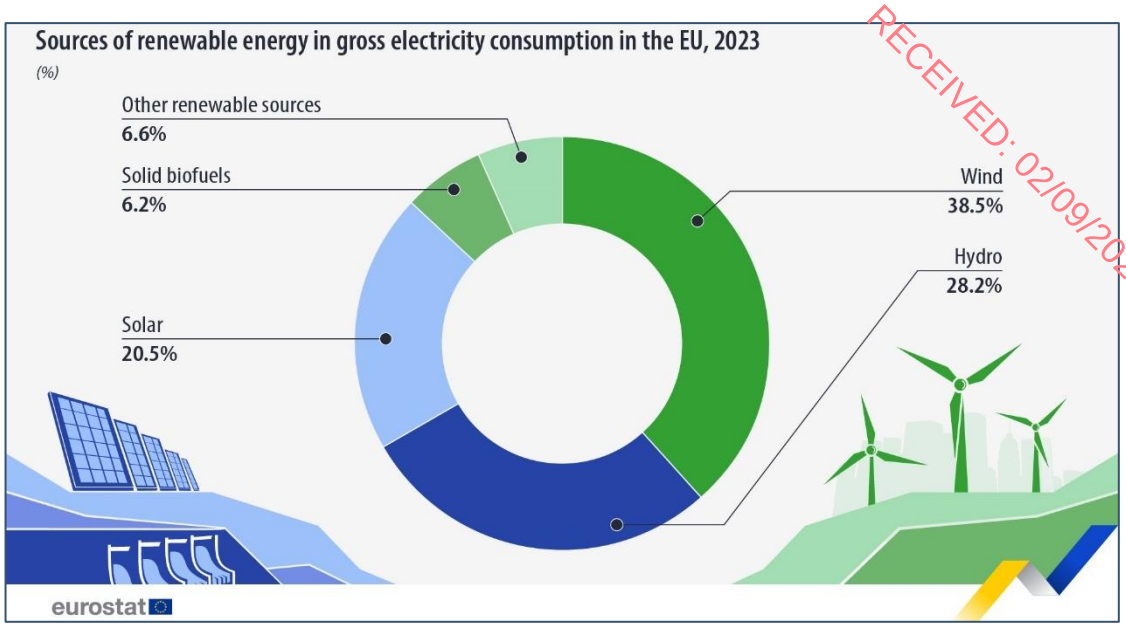

Figure 2-1: Overall share of energy from renewable sources (source: Eurostat)

Industry Research

Repowering Ireland (June, 2024) considered how Ireland can stay global leaders in onshore wind energy. Produced by MKO for Wind Energy Ireland (WEI) the report considered the real effect the loss of installed onshore wind energy capacity by 2030 will have on Ireland' carbon emissions, electricity prices, and ultimately meeting our climate goals. The research found that of the 4,347 MW of wind farms connected by Q3 2023, 854 MW will have to be decommissioned by 2030 and 2,488 MW by 2040, unless they are repowered or extended. The analysis of spatial planning policy across the local authority areas identified locations of existing operational wind farms and their underlying planning policy for wind energy development. The analysis shows that of the 4,347MW of operational wind farms, 26% (1,123MW) are located in areas in which wind energy developments are not favoured, 10% (446MW) are located in areas currently without any policy classification, which poses a challenge for their repowering potential. Only 65% are located in favoured areas, despite the fact that all existing wind farm locations previously being deemed appropriate for wind energy development when planning permission was first granted in previous decades. The research also considered the fact that some existing wind farms ripe for repowering are located in designated Special Protection Areas (SPAs) designated for the protection of hen harrier under the EU Birds Directive. This is particularly relevant given the research established that there is 732MW of wind energy generating capacity currently installed within the hen harrier SPAs, and a further 347MW installed within five kilometres of these same SPAs. The research also suggested a strategy for repowering wind farms in SPAs for hen harrier, which involves assessing the impacts on the conservation objectives of the SPAs, and exploring the possibility of proceeding through the Imperative Reasons of Overriding Public Interest (IROPI) route, drawing on the recent EU policies that classify renewable energy projects as being in the overriding public interest. Section 6 of the Report considers this in depth, considering repowering or extension of life of wind energy developments in SPAs specifically designated the protection of hen harrier. The conflict which exists between the necessary utilisation or expansion of existing wind energy developments in SPAs to meet national or European targets, and the need to protect and restore the populations of a critically endangered breeding bird species, is one where a solution must be found but the challenge cannot be underestimated. In that vein, it is of note that the Stacks to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA in which the subject site is located, contained 29 operational wind farms with a MW Capacity (MEC) of 617.46MW. A significant portion of onshore wind generation would be lost if upon the end of these wind farms lives, each are decommissioned and no replacement wind energy development erected or no extension to their operational life granted planning permission. The Report states:

"A number of further provisions on the RED III Directive EU 2023/2413 clearly indicate the intention of European legislation to consider renewable energy development as appropriate and necessary, even where the potential exists for impacts on protected birds and other species and habitats. These include the following (key text underlined):

> *Article 16b*
>
> *Permit-granting procedure outside renewables acceleration areas*
>
> *2. Where an environmental assessment is required pursuant to Directive 2011/92/ЄU or 92/43/ЄEC, it shall be carried out in a single procedure that combines all relevant assessments for a given renewable energy project. When any such environmental impact assessment is required, the competent authority, taking into account the information provided by the project developer, shall issue an opinion on the scope and level of detail of the information to be included by the project developer in the environmental impact assessment report, of which the scope shall not be extended subsequently. Where a renewable energy project has adopted necessary mitigation measures, any killing or disturbance of the species protected under Article 12(1) of Directive 92/43/ЄEC and Article 5 of Directive 2009/147/ЄC shall not be considered to be deliberate. Where novel mitigation measures to prevent as much as possible the killing or disturbance of species protected under Directives 92/43/ЄEC and 2009/147/ЄC, or any other environmental impact, have not been widely tested as regards their effectiveness, Member States may allow their use for one or several pilot projects for a limited time period, provided that the effectiveness of such mitigation measures is closely monitored and appropriate steps are taken immediately if they do not prove to be effective.*

On the basis of the above, it is considered likely that adequate justification could be made that the extension of life or repowering of wind farms within or adjacent to Irish SPAs, is of overriding public interest. There is no consideration of the scale of the development in the above text and therefore a credible case could be made that all renewable energy developments may be considered IROPI regardless of scale, until carbon neutrality is achieved."

The concluding findings of the Report should be noted:

> *"To take advantage of the above opportunity, it must be accepted that the repowering of wind farms within and adjacent to SPAs has the presumption of being of overriding public interest, unless otherwise proven on a case-by-case basis. It will also be necessary to agree the nature and scale of compensation/enhancement that will be required from each repowering development to offset any potential impact they may be having on hen harrier. There is also potential for the compensation/ enhancement associated with the repowering of wind farms to result in net gains for hen harrier ecology and conservation."*

Ireland's Greenhouse Gas Emissions Projections 2022 – 2040

The Environmental Protection Agency (EPA) publish Ireland's Greenhouse Gas Emission Projections and at the time of writing, the most recent report, 'Ireland's Greenhouse Gas Emissions Projections 2023–2050' was published in May 2024. The report includes an assessment of Ireland's progress towards achieving its emission reduction targets out to 2050 set out under the EU emission reduction targets as set out under the Effort Sharing Regulation.

The EPA has produced two scenarios in preparing GHG emissions projections to 2050, a "With Existing Measures" (WEM) scenario and a "With Additional Measures" (WAM) scenario. These scenarios forecast Irelands GHG emissions in different ways. The WEM scenario assumes that no additional policies and measures, beyond those already in place by the end of 2022. This is the cut off point for which the latest national GHG emission inventory data is available, known as the 'base year' for projections. The WAM scenario has a higher level of ambition and includes Government policies and measures to reduce emissions such as those in Ireland's Climate Action Plan 2024.

The EPA Emission Projections Update notes the following key trends:

- Ireland is not on track to meet the 51 per cent emissions reduction target (by 2030 compared to 2018) based on these projections which include most 2024 Climate Action Plan measures. (emphasis added)
- Emissions from the Energy Industries sector are projected to decrease by between 57 and 62 per cent over the period 2022 to 2030. Renewable energy generation at the end of the decade is projected to range from 69 to 80 per cent of electricity generation as a result of a projected rapid expansion in wind energy and other renewables.
- Sectoral emissions ceilings for 2025 and 2030 are projected to be exceeded in almost all cases, including Agriculture, Electricity, Industry and Transport.
- The first two carbon budgets (2021-2030), which aim to support achievement of the 51 per cent emissions reduction goal, are projected to be exceeded by a significant margin of between 17 and 27 per cent.

As decarbonising electricity generation will have a significant positive contribution in achieving Ireland's emissions it is clear that additional renewable energy production such as that of the Proposed Lifetime Extension must be encouraged and supported if carbon saving targets are to be met.

National Energy Projections

The National Energy Projections report was published by the SEAI in December 2024 sets out the most recent updates to Ireland's progress towards its binding European and National renewable energy targets.

In 2023 REDII set an EU wide target for overall RES of 32% RES in 2030. Member states set their national contributions to the EU-wide target, with Ireland setting its at 34.1% in 2030. REDIII increased the binding EU-wide target for overall RES to at least 42.5% with Ireland subsequently increasing its target to 43% in 2030.

The decarbonisation of the electricity generation is critical considering the need to electrify other sectors such as heating and transport in order to achieve the sectoral decarbonisation targets. By 2030, renewable energy sources are anticipated to dominate electricity generation, particularly experiencing a significant surge later in the decade attributed to the integration of substantial offshore wind projects. In the CAP23 scenario, there is an expedited deployment of onshore renewable generation capacity in the earlier years of the decade compared to the CAP21 scenario. However, both scenarios aim to achieve a similar overall percentage of electricity derived from renewable sources (RES-E) by the year 2030.

Figure 1.27 of the Report, copied below, illustrates clearly the gap between the current installed wind capacity and the CAP targets.

Figure 1.27: Ireland's installed wind capacity with 2024 estimates, projections to 2030, CAP targets

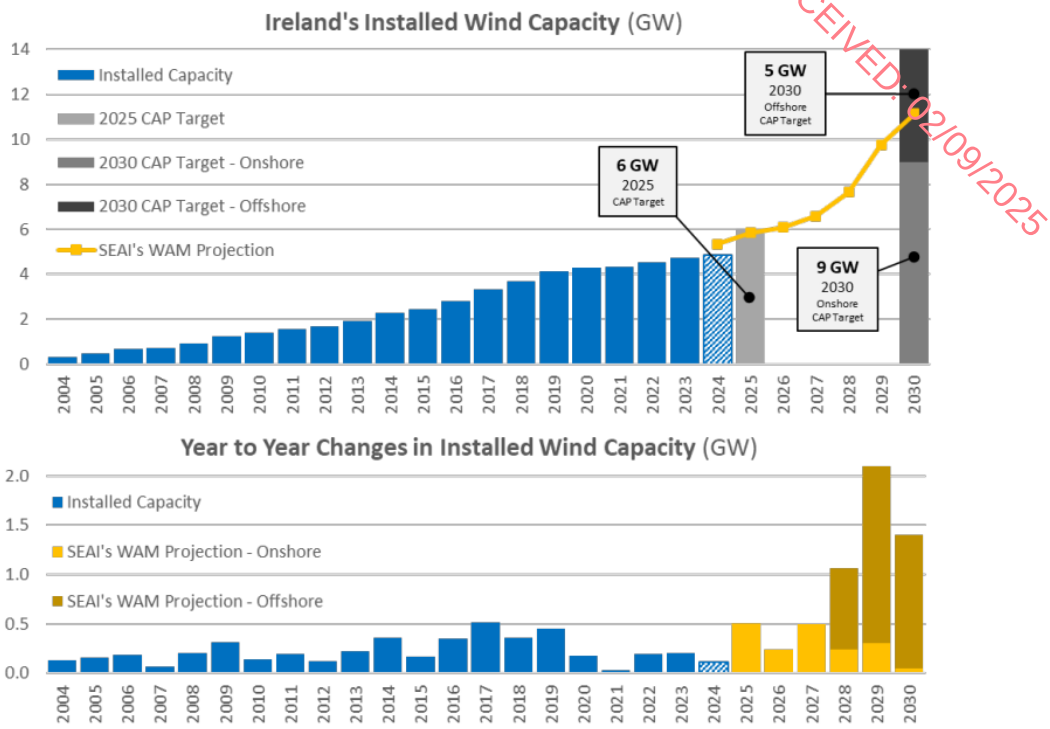

Figure 2-2: Ireland's installed wind capacity with 2024 estimates, projections to 2030, CAP targets

The SEAI projections explore the risk scenarios With Existing Measures (WEM) and With Additional Measures (WAM), the aim being to address the gap between current policy trajectories and the most ambitious planned policies scenarios. The SEAI scenario modelling do not consider the CAP24 but rather CAP23.The SEAI projections under the 'with additional measures' (WAM) scenario indicate a total installed capacity of 11.2GW by the end of 2030. The Report goes on to note that "*Over the last 10 years, Ireland has added wind capacity at an average rate of 0.26GW per annum, although this has dropped to a rate of 0.14GW over the last 5 years. To align with the pace of the WAM projections needed to deliver on the 80% RES-E target, the roll out of onshore wind capacity needs to return to the rate previously achieved between 2016 and 2019...*"

The report projects GHG emissions under the WEM and WAM scenarios. It notes that since April 2023 there has been a "*significant increase in net electricity imports across the interconnectors with the UK*" and "*electricity net-imports were far higher than other years, and higher than projected in the WEM or WAM scenarios...*" The report continues to consider two sectoral ceilings for the electricity sector – CB1 ceiling 2021-2025 (five year cumulative) ($MtCO_2eq$) and CB2 ceiling 2026-2030 (five year cumulative) ($MtCO_2eq$). It finds that in both the WEM and WAM scenarios, cumulative emissions reach the first sectoral ceiling in 2025, and the second in 2029.

It is clear from the projections outlined above that unprecedented action is required as soon as possible: *"Where any exceedance occurs, steeper reductions are required to compensate, leading to a larger reduction required by 2030."*

The Climate Change Advisory Council Annual Review 2024

The Climate Change Advisory Council (CCAC) open their 'Annual Review 2024-Summary for All' quite starkly, stating *"... progress to reduce emissions is not sufficient for Ireland to meet its national and EU climate obligations. Reliance on fossils fuels needs to end, and urgent action is required to ensure that people, places and nature can adapt to the changing climate and prepare for rapidly emerging climate risks. The current rate of policy implementation is too slow and fragmented, and more effective*

engagement across all segments of policy and society is required to empower sustainable decision-making and to understand and remove barriers to action." (emphasis added)

In addition, the standout recommendation from the CCAC is that *"So that Ireland can end its reliance on fossil fuels, Government should cease subsidising fossil fuel consultation and increase funding and make it more accessible to enable and accelerate the rapid uptake of low-carbon technologies and alternatives across all sectors."*

In relation to the electricity sector specifically planning reform continues to be cited as a key area requiring urgent attention.

Ireland's Climate Change Assessment

In January 2024, the EPA published Irelands Climate Change Assessment (ICCA). This assessment provides a comprehensive overview and breakdown of the state of knowledge around key aspects of climate change with a focus on Ireland. The ICCA report is presented in four volumes.

- Volume 1: Climate Science – Ireland in a Changing World
- Volume 2: Achieving Climate Neutrality in 2050
- Volume 3: Being Prepared for Irelands Future
- Volume 3: Realising the Benefits of Transition and Transformation

The ICCA Synthesis Report states that having peaked in 2001, Irelands GHG emissions have reduced in all sectors except agriculture. However, Ireland currently emits more GHG per person than the EU average. The report goes on to state that there has been an identified gap in policy that indicates that Ireland will not meet its statutory GHG emission targets. Achieving net zero carbon dioxide emissions by 2050 requires significant and unprecedented changes to Ireland's energy system. Policies tailored to suit different stages of technology development are critical for achieving a net zero energy system. Established technologies, such as wind energy, solar photovoltaics and bioenergy will be key in meeting short-term emission reduction targets (i.e. 2030), whereas offshore wind infrastructure is expected to be the backbone of future energy systems. This can only be achieved with appropriate support schemes, regulation and investments for synergistic growth of offshore wind and other renewable technologies.

There are well-established 'no-regret options' that need to happen now, which can get Ireland most of the way to net zero carbon dioxide emissions. Beyond that, there are 'future energy choices' relating to the scale and magnitude of technologies that will assist in achieving Ireland statutory climate targets. Ireland's no-regret options include deployment of market-ready renewables (e.g. wind energy and solar photovoltaics). Irelands future choices include hydrogen, carbon capture and storage, nuclear energy and electro-fuels. Renewable energy can increasingly provide our future energy needs but will need to be complemented with carbon dioxide removals to achieve a net zero energy system in hard-to-abate sectors.

The Climate Change Advisory Council Electricity Sectoral Review

The Climate Advisory Council published its annual review in May 2024, it outlines detailed observations and recommendations for the Electricity sector in Ireland. This review emphasises the urgent need for Ireland to accelerate its transition to renewable energy to meet its 2030 electricity capacity targes and adhere to sectoral emissions ceilings.

The Climate Change Advisory Council states:

> *"Ireland needs to reduce and ultimately prevent emissions of greenhouse gases. to stay within the agreed carbon budget, the Electricity sector needs to achieve the largest reduction in sectoral emissions of all sectors: a 75% decrease by 2030 compared with 2018."*

Key observations in relation to Renewable Electricity are outlined below:

- Renewables accounted for 41% of electricity demand in 2023, up from 39% in 2022.
- By the end of 2023, the total renewable grid capacity in Ireland was 5.7 GW with the majority (4.7 GW) from onshore wind turbine installations.
- In 2023, only onshore wind (0.2 GW) generation was connected. This is significantly below the annual average increase of 1.6 GW of onshore renewables required to meet 2030 capacity targets.
- In 2023, 0.5 GW of wind projects received planning permission; however, no onshore wind projects were awarded permission before September. Appeals and judicial reviews, including for all of An Coimisiún Pleanála's approved projects, continue to delay the development of projects.

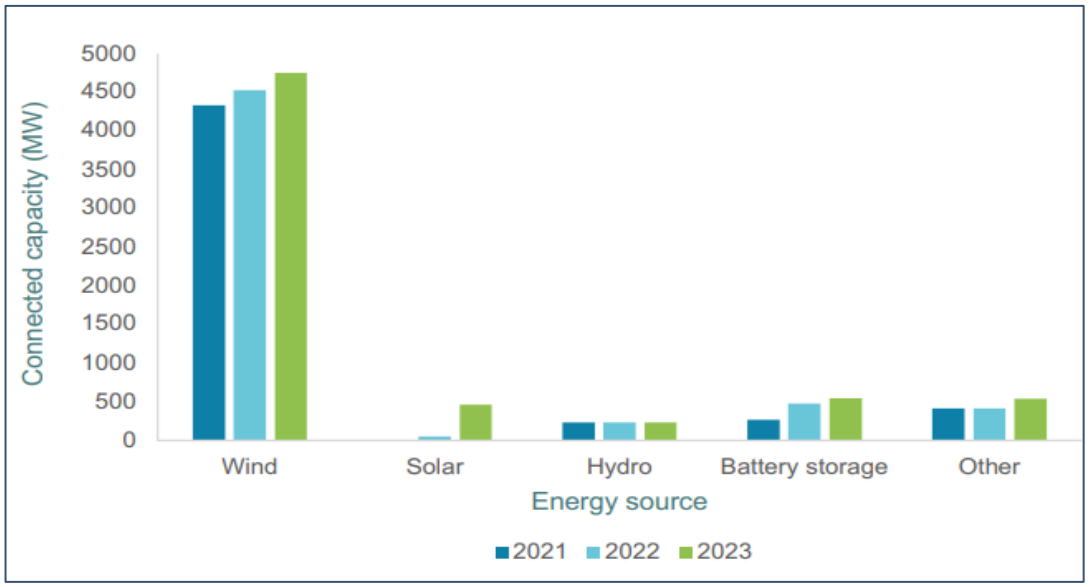

Figure 2-3: Renewable energy capacity and storage connected to the grid in Ireland 2021-2023

Energy in Ireland 2024 Report

In December 2024 the SEAI published their '*Energy in Ireland 2024 Report*', stating that in 2023, 44.3% of the electricity generated indigenously in Ireland came from gas, with renewables accounting for a further 40.7%. The overall renewable energy share for gross final energy consumption for 2023 was 14.1%. 2023 had the lowest energy-related emissions of any year in the last quarter century, except for 2020 which was heavily influence by the COVID-19 lockdowns. The SEAI Energy in Ireland 2024 report, states that energy- related emissions were down 8.3% from 2022 levels in 2023 and the carbon intensity of the national grid was down to 254 gCO2/kWh, which is the lowest carbon intensity value ever reached in Ireland.

The Proposed Lifetime Extension will continue to support the reduction of GHG emissions in Ireland through the generation of clean renewable wind energy from the Taurbeg Wind Farm.

2.6 Biodiversity and Nature Restoration Policy and Targets

2.6.1 European Biodiversity and Nature Restoration Policy

Nature Restoration Law 2024

The Regulation on Nature Restoration (Nature Restoration Law) came into effect on, August 18, 2024. The Nature Restoration Law is the first continent-wide, comprehensive law of its kind. It is a key element of the EU Biodiversity Strategy, which sets binding legal targets to restore degraded ecosystems, in particular those with the most potential to capture and store carbon, improve biodiversity values and to prevent and reduce the impact of natural disasters. The EU Nature Restoration Law seeks to repair European habitats that are in poor condition and enhance ecosystem services. The EU Nature Restoration Law seeks to restore 20% of the EU's land and sea areas by 2030 and all ecosystems by the year 2050.

The law aims to restore ecosystems, habitats and species across land and sea areas in the EU in order to:

- enable the long-term and sustained recovery of biodiversity and increase resilience
- contribute to achieving the EU's climate mitigation and climate adaptation objectives
- meet international commitments

Europe's nature is in alarming decline, with more than 80% of habitats in poor condition. Restoring peatlands, wetlands, rivers, forests, grasslands, marine ecosystems, and the species they host will help to:

- increase biodiversity,
- secure the things nature does for free, like cleaning our water and air, pollinating crops, and protecting us from floods,
- limit global warming to 1.5°C,
- and, build up Europe's resilience and strategic autonomy, preventing natural disasters and reducing risks to food security.

Full implementation of the law is crucial to restore the EU's biodiversity and stop further biodiversity loss, to reach climate neutrality by 2050 and adapt to climate change, and to enhance food security for EU citizens. In doing so, the law will support the achievement of other European ambitions, such as water security.

The regulation contains the following specific targets:

- ***targets based on existing legislation (for wetlands, forests, grasslands, river and lakes, heath & scrub, rocky habitats and dunes)*** *- improving and re-establishing biodiverse habitats on a large scale, and bringing back species populations by improving and enlarging their habitats*
- ***pollinating insects*** *– reversing the decline of pollinator populations by 2030, and achieving an increasing trend for pollinator populations, with a methodology for regular monitoring of pollinators*
- ***forest ecosystems*** *– achieving an increasing trend for standing and lying deadwood, uneven aged forests, forest connectivity, abundance of common forest birds and stock of organic carbon*
- ***urban ecosystems*** *– no net loss of green urban space and tree cover by 2030, and a steady increase in their total area from 2030*
- ***agricultural ecosystems*** *– increasing grassland butterflies and farmland birds, the stock of organic carbon in cropland mineral soils, and the share of agricultural land with high-diversity landscape features; restoring drained peatlands under agricultural use*
- ***marine ecosystems*** *– restoring marine habitats such as seagrass beds or sediment bottoms that deliver significant benefits, including for climate change mitigation, and restoring the habitats of iconic marine species such as dolphins and porpoises, sharks and seabirds.*

- ***river connectivity*** *– identifying and removing barriers that prevent the connectivity of surface waters, so that at least 25 000 km of rivers are restored to a free-flowing state by 2030*

Part 65 of the Nature Restoration Law relates specifically to restoration for habitats and species protected under the EU Habitats Directive 92/43/EEC (the Habitats Directive) and the EU Birds Directive 2009/147/EC (the Birds Directive), and states that:

> *"Restoration targets and obligations... for pollinators and for freshwater, urban, agricultural and forest ecosystems should be complementary and work in synergy, with a view to achieving the overarching objective of restoring ecosystems across the Member States' land and sea areas. The restoration measures required to meet one specific target will, in many cases, contribute to meeting other targets or fulfilling other obligations"*

Part 65 also states that:

> *"Restoration measures should also be planned in such manner that they address climate change mitigation and climate change adaptation and the prevention and control of the impact of natural disasters, as well as land degradation"*

Part 68 of the Nature Restoration Law specifically relates to the importance of addressing the dual climate and biodiversity crises and acknowledges that:

> *"the restoration of biodiversity should take into account the deployment of renewable energy and vice versa. It should be possible to combine restoration activities and the deployment of renewable energy projects, wherever possible"*

The Proposed Offsetting Measures will restore habitat for the benefit of hen harrier and will also improve biodiversity in the Proposed Offsetting Lands and is therefore in line with the Nature Restoration Law.

European Biodiversity Strategy for 2030

The EU Biodiversity Strategy for 2030 sets out an ambitious and far-reaching programme of measures to halt and reverse biodiversity loss in the EU.

The Strategy aims to address the five main drivers of biodiversity loss and put in place an enhanced governance framework, as well as address policy gaps, while at the same time consolidating existing efforts and ensuring the full implementation of existing EU environmental and climate legislation.

The Strategy highlights that the biodiversity and climate crisis are intrinsically linked. Just as the crises are linked, so are the solutions. Nature regulates the climate, and nature-based solutions, such as protecting and restoring wetlands, peatlands and coastal ecosystems, or sustainably managing marine areas, forests, grasslands and soils, will be essential for emission reduction and climate adaptation. The EU Biodiversity Strategy sets out four pillars:

- Protect Nature
- Restore Nature
- Enable Transformative Change
- EU Action to Support Biodiversity Globally

The Proposed Offsetting Measures which propose the restoration of open peatland, creation of scrub habitat and the restoration of the farmland habitat for the benefit of hen harrier, aligns with the EU Biodiversity Strategy as it will help to protect and restore nature.

EU Strategy on Adaptation to Climate Change (2021)

The European Commission adopted its new EU Strategy on Adaptation to Climate Change on 24 February 2021. The new strategy sets out how the European Union can adapt to the unavoidable impacts of climate change and become climate resilient by 2050. The Strategy has four principal objectives: to make adaptation smarter, swifter and more systemic, and to step up international action on adaptation to climate change.

The effects of climate change are already being felt, and so we must adapt more quickly and comprehensively. The strategy therefore focuses on developing and rolling out adaptation solutions to help reduce climate-related risk, increase climate protection and safeguard the availability of fresh water.

It will support the further development and implementation of adaptation strategies and plans at all levels of governance with three cross-cutting priorities:

- Integrating adaptation into macro-fiscal policy
- Nature-based solutions for adaptation
- Local adaptation action

Section 11 "*Promoting nature-based solutions for adaptation*" states:

> *"For example, protecting and restoring wetlands, peatlands, coastal and marine ecosystems; developing urban green spaces and installing green roofs and walls; promoting and sustainably managing forests and farmland will help adapt to climate change in a cost-effective way. It is vital to better quantify their benefits, and to better communicate them to decision-makers and practitioners at all levels to improve take-up"*

The Proposed Offsetting Measures are in accordance with the EU Strategy on Adaptation to Climate Change as it seeks to protect and restore habitats for the benefit of hen harrier.

2.6.1.2 Proposed Offsetting Measures - Compliance with European Biodiversity and Nature Restoration Policy

At the European level, the section above highlights several key legislative and strategic frameworks that support the Proposed Offsetting Measures. The Nature Restoration Law (2024) is a central piece of legislation that mandates the restoration of 20% of the EU's land and sea areas by 2030, with the goal of restoring all ecosystems by 2050. This law emphasises the restoration of habitats such as peatlands and grasslands, which are vital for biodiversity. The Proposed Offsetting Measures, which include the restoration of peatland and farmland habitats for the benefit of the hen harrier, are directly aligned with these objectives.

The European Biodiversity Strategy for 2030 further reinforces the importance of halting and reversing biodiversity loss. It promotes nature-based solutions, such as habitat restoration, as essential tools for both biodiversity conservation and climate adaptation. The Proposed Offsetting Measures supports this strategy by enhancing habitats that are critical for the hen harrier, a species protected under the EU Birds Directive.

Additionally, the European Climate Law (2021) set ambitious targets for achieving net-zero emissions by 2050 and a 55% reduction by 2030. The Proposed Offsetting Measures contribute to these goals by offsetting the potential significant effects of the continued operation of a renewable energy project. The EU Strategy on Adaptation to Climate Change (2021) also supports the project, as it emphasises the role of nature-based solutions in building climate resilience.

2.6.2 National Biodiversity and Nature Restoration Policy

National Biodiversity Action Plan

Ireland's 4th National Biodiversity Action Plan (NBAP) 2023-2030, strives for a "*Whole-of-Government, Whole-of-Society*" approach to the governance and conservation of biodiversity. It demonstrates Ireland's continuing commitment to meeting and acting on its obligations to protect Ireland's biodiversity for the benefit of future generations and will implement this through a number of key targets, actions and objectives.

The Wildlife (Amendment) Act 2023 introduced a new public sector duty on biodiversity. The legislation provides that every public body, is obliged to have regard to the objectives and targets in the NBAP. The NBAP sets out five key objectives as follows:

- **Objective 1: Adopt a Whole-of Government,** Whole of-Society Approach to Biodiversity. Proposed actions include capacity and resource reviews across Government; determining responsibilities for the expanding biodiversity agenda providing support for communities, citizen scientists and business; and mechanisms for the governance and review of this National Biodiversity Action Plan.
- **Objective 2: Meet Urgent Conservation and Restoration Needs.** Supporting actions will build on existing conservation measures. Efforts to tackle Invasive Alien Species will be elevated. The protected area network will be expanded to include the Marine Protected Areas. The ambition of the EU Biodiversity Strategy will be considered as part of an evolving work programme across Government.
- **Objective 3: Secure Nature's Contribution to People.** Actions highlight the relationship between nature and people in Ireland. These include recognising the tangible and intangible values of biodiversity, promoting nature's importance to our culture and heritage and recognising how biodiversity supports our society and our economy.
- **Objective 4: Enhance the Evidence Base for Action on Biodiversity.** This objective focuses on biodiversity research needs, as well as the development and strengthening of long-term monitoring programmes that will underpin and strengthen future decision-making. Action will also focus on collaboration to advance ecosystem accounting that will contribute towards natural capital accounts.
- **Objective 5: Strengthen Ireland's Contribution to International Biodiversity Initiatives.** Collaboration with other countries and across the island of Ireland will play a key role in the realisation of this Objective. Ireland will strengthen its contribution to international biodiversity initiatives and international governance processes, such as the United Nations Convention on Biological Diversity.

The Proposed Offsetting Measures are aligned with the NBAP as restoring peatland and other similar habitats, that are used by hen harriers, removes carbon dioxide from the atmosphere and supports climate resilience.

2.6.2.2 Proposed Offsetting Measures - Compliance with National Biodiversity and Nature Restoration Policy

At the national level, the NBAP adopts a whole-of-government approach to biodiversity conservation and emphasises the importance of habitat restoration and species protection. The Proposed Offsetting Measures support this plan by restoring habitats that support hen harrier and by contributing to broader biodiversity goals.

2.7 Planning Policy Context

This section of the EIAR provides the strategic planning context of the Proposed Project. As is examined below, the Proposed Project is in line with national, regional and local policies, frameworks, guidelines and plans. This section has been broken down to the following sections:

- National Policy Context
- Regional Policy Context
- Local policy Context

As a renewable energy project, the Proposed Project is consistent with the overall national policy objectives to increase penetration and deployment of renewable energy resources. Compliance with the Cork County Development Plan policies are dealt with in detail in the Local Policy section below. The Proposed Wind Farm is assessed in further detail against the provisions of the Cork County Development Plan in the Planning Report included within the planning application to Cork County Council.

2.7.1 National Policy Context

2.7.1.1 Proposed Lifetime Extension

National Policy Framework (2018)

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

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

The project population growth that Ireland is expected to experience - an increase of approximately 1 million people by 2040 - will place further demand on both the built and natural environment. To strengthen and facilitate more environmentally focused planning at the local level, the NPF states that future planning and development will need to:

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

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

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

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

Relevant to the subject development, the **National Strategic Outcome 8** (*Transition to Sustainable Energy*), notes that in creating Ireland's future energy landscape, new energy systems and transmission grids will be necessary to enable a more distributed energy generation which connects established and emerging energy sources, i.e. renewables, to major sources of demand. The successful transition to a low-carbon power system will depend on the pillars of 1) *Sustainability*, 2) *Security of supply* and 3) *Competitiveness*. A common theme underpinning these pillars is the need for a fit-for-purpose transmission and distribution energy network. Specifically, the NPF states that reinforcement of the distribution and transmission network to facilitate planned growth and distribution of a more renewables focused source of energy across the major demand centres, e.g. the functional purpose of the extant grid connection.

Ireland's national energy policy under **Objective 55** aims to '*promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050'*. The NPF aims to ensure that decisions that are made today meet our future needs in a sustainable manner.

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

An overarching objective of the NPF is to foster a transition toward a low carbon, climate-resilient society, which reflects the policy ethos established at the European level of governance (e.g. climate change and renewable energy targets – Section 2.3 & 2.4). In this regard, one of the key themes of the NPF is the realisation of an Ireland which has a secure and sustainable renewable energy supply and the ability to diversify and adapt to new energy technologies. The NPF references the National Climate Policy Position (superseded by the then CAP 2019) which established the fundamental objective of achieving transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050. The NPF emphasises that rural areas have a strong role to play in securing a sustainable renewable energy supply for the country and acknowledges that *"rural areas have significantly contributed to the energy needs of the country and continue to do so"*. In this regard, the NPF states:

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

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

The Proposed Lifetime Extension represents a significant multi-million investment in a rural area, in the renewable energy industry which is essential for diversifying the energy sector, contributing to innovation in the rural economy and delivering on climate and energy targets. National Planning **Objective 21** of the NPF aims to *'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'. The existing Taurbeg Wind Farm is directly supporting economic growth in rural Co. Cork while also contributing to national, regional and local climate and renewable energy targets.

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

National Planning Framework First Revision (2025)

On the 8th April 2025, the Government approved the National Planning Framework First Revision (Revised NPF) which was subsequently passed through both Houses of the Oireachtas. The Revised NPF aims to address changes that have occurred in Ireland since 2018.

The Revised NPF provides an updated projection for the population of Ireland, with the population expected to increase to 6.1 million by 2040. This population growth will place further demand on both the built and natural environment, and subsequently, the services required to meet said demands. In order to strengthen and facilitate more environmentally focused planning at the local level, the Revised NPF states that future planning and development will need to:

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

National Strategic Outcome 8 (*'Transition to a Carbon Neutral and Climate Resilient Society'*) notes that in creating Ireland's future energy landscape, new energy systems and transmission grids will be necessary to enable a more distributed energy generation which connects established and emerging energy sources, i.e. renewables, to major sources of demand.

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

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

Regional Renewable Energy Capacity Allocations have been introduced under the Revised NPF. This was one of the key actions for CAP24 and is supported under CAP25. The Southern Region, in which the Proposed Project is located, is allocated a target of installing an **additional 978 MW of onshore wind energy by 2030.** The Southern Region has a current (2023) energised capacity of 2,622 MW, to which the existing Taurbeg Wind Farm contributes to.

Under **NPO 74** Regional Assemblies are required to plan for the delivery of the regional renewable electricity capacity allocations outlined in the Revised NPF and identify allocations for each of the local authorities within their RSES. Furthermore, **NPO 75** requires Local Authorities to plan for the delivery of Target Power Capacity (MW) allocations consistent with the relevant RSES, through their City and County Development Plans. At the time of writing, no local Target Power Capacity allocations have been established, however it is clear from the regional allocation that the Southern Region is set to deliver a significant amount of onshore wind energy in the coming years.

The introduction of renewable energy targets represents a more active and prescriptive approach to land use planning for renewable energy development. The Revised NPF aligns the national target of 9GW of onshore wind energy with the policies and objectives of Local Authorities. In regard to this, it is clear that the continued operation of the existing Taurbeg Wind Farm is in line with aims and objectives of the Revised NPF, which seeks to transition to a carbon neutral economy.

National Development Plan 2021-2030

The National Development Plan 2021 – 2030 (NDP) was published on 4th October 2021 and sets out the major public investment projects identified by Government which are to play a significant role in addressing the opportunities and challenges faced by Ireland over the coming years such as Covid-19, Brexit, housing, health, population growth, and most relevant to the subject development, climate change. It is stated that the NDP 2021 – 2030 will be the *'largest and greenest ever delivered in Ireland'*, and in this regard, the NDP highlights that extensive consultation was undertaken to ensure that the plan adequately supports the implementation of climate action measures. Reflecting on the recent publication of the IPCC's 6th Assessment Report, the NDP notes that the Irish Government is fully committed to 'playing its part' to ensure that the worst climate change damage can be avoided, e.g. significant reductions in CO_2 and other GHG emissions as assisted by the achievement of both European and National renewable energy targets. Specifically, the NDP states that,

> *"The next 10 years are critical if we are to address the climate crisis and ensure a safe and bright future for the planet, and all of us on it.*
>
> *The investment priorities included in this chapter [Ch. 13] must be delivered to meet the targets set out in the current and future Climate Action Plans, and to achieve our climate objectives. The investment priorities represent a decisive shift towards the achievement of a decarbonised society, demonstrating the Government's unequivocal commitment to securing a carbon neutral future."*

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

One of the NDP's strategic climate priorities in the need for low-carbon, resilient electricity systems; specifically, the plan commits to increasing the share of renewable electricity up to 80% by 2030. This is characterised by the NDP as an '*unprecedented commitment to the decarbonisation of electricity supplies*', which is certainly an ambitious and an explicit driver for the continued operation of renewable generators such as the Proposed Lifetime Extension. The focus of investment in renewable energy infrastructure is to contribute to a long-term, sustainable and competitive energy future for Ireland.

2.7.1.2 Proposed Offsetting Measures

National Planning Framework – First Revision (2025)

In April 2025, both houses of the Oireachtas approved the Government's Revised National Planning Framework (NPF). The revision reflects changes to Government policy that have taken place since the initial publication of the NPF six years ago, such as climate transition and nature restoration.

The following National Policy Objectives are applicable to the Proposed Offsetting Measures:

- ***NPO 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 principles of the mitigation hierarchy of - avoid, minimise, restore and offset - of potential biodiversity impacts, in statutory land use 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.

- ***NPO 87:*** *Enhance the conservation status and improve the management of protected areas and protected species by:*
  - *Implementing relevant EU Directives to protect Ireland's environment and wildlife and support the objectives of the National Biodiversity Action Plan;*
  - *Developing and utilising licensing and consent systems to facilitate sustainable activities within Natura 2000 sites;*
  - *Continued research, survey programmes and monitoring of habitats and species.*
- ***NPO 89:*** *Protect, conserve and enhance the rich qualities of natural, cultural and built heritage of Ireland in a manner appropriate to their cultural and environmental significance.*

The Proposed Offsetting Measures propose to restore habitats to support hen harrier and will contribute to broader biodiversity goals, as such they are in line with the Revised NPF.

2.7.2 Regional Policy Context

2.7.2.1 Proposed Lifetime Extension

Regional Spatial and Economic Strategy for the Southern Region

The Southern Regional Assembly (EMRA) was established in 2015, is part of the regional tier of governance in Ireland and is primarily focused on the preparation and implementation of Regional Spatial and Economic Strategies (RSES), integration of Local Economic and Community Plans (LECPs), management of EU Operational Programmes, EU project participation, implementation of national economic policy, and working with the National Oversight and Audit Commission.

The RSES seeks to achieve balanced regional development and full implementation of Project Ireland 2040 – the National Planning Framework. It will be implemented in partnership with local authorities and state agencies to deliver on this vision and build a cohesive and sustainable region.

> *"The RSES primarily aims to support the delivery of the programme for change set out in Project Ireland 2040, the National Planning Framework (NPF) and the National Development Plan 2018-27 (NDP). As the regional tier of the national planning process, it will ensure coordination between the City and County Development Plans (CCDP) and Local Enterprise and Community Plans (LECP) of the ten local authorities in the Region."*

The RSES is committed to the implementation of the Climate Action Plan 2019 (superseded by CAP 24) by playing its part in the development of wind, wave, tidal, solar, hydro, and bio energy. The ambition is reflected in the Regional Policy Objectives (RPO's) which sets out the key regional policies for the 12-year lifetime of the plan. RPO 87: Low Carbon Future, states:

> *"The RSES is committed to the implementation of the Climate Action Plan 2019 by playing its part in the development of renewable energy. This is clearly reflected in the Regional Policy Objectives (RPO's) which sets out the key regional policies for the lifetime of the plan, from 2018 – 2030"*

With regards to climate change the RSES notes that:

> *"All global risks of climate change are risks to the Southern Region. The Southern Regional Assembly is committed to plays its role to put in place a high-level regional strategy for transition to a low carbon economy and society across all sectors."*

As noted and recognised by the RSES, Ireland and the EU are signatories to the Paris Agreement, a legally binding international agreement to restrict global temperature rises to below 2°C above pre-industrial levels, and to limit any increase to 1.5°C to significantly reduce the risks and impacts of climate change. It is further noted that *'Ireland's international commitments also extend to the UN's Sustainable Development Goal 13, to 'take action to combat climate change and its impacts."*

Chapter 5 of the RSES notes detail's the regions plans and objectives with regards to the environment. The RSES focus includes the following areas:

- Renewable Energy
- Energy Efficiency
- Sustainable transport
- Agriculture
- Forestry
- Climate resilience

The following Regional Policy Objectives have been listed with regards to climate change: ***RPO 87 Low Carbon Energy Future:*** *The RSES is committed to the implementation of the Government's policy under Ireland's Transition to a Low Carbon Energy Future 2015-30 and Climate Action Plan 2019. It is an objective to promote change across business, public and residential sectors to achieve reduced GHG 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.*

RPO 88 National Mitigation Plan and National Adaptation Framework: *The RSES is committed to the implementation of the National Mitigation Plan and National Adaptation Framework: Planning for a Climate Resilient Ireland to enable the Region transition to a low carbon, climate resilient and environmentally sustainable economy. It is an objective to ensure effective co-ordination of climate action with the Climate Action Regional Offices and local authorities to implement the National Mitigation Plan and the National Adaptation Framework in the development and implementation of long-term solutions and extensive adaptation measures.*

RPO 90 Regional Decarbonisation*: It is an objective to develop a Regional Decarbonisation Plan to provide a framework for action on decarbonisation across all sectors. The Regional Decarbonisation Plan shall include existing and future targets for each sector and shall be prepared with key stakeholders, including the Climate Action Regional Offices, and shall identify the scope and role of the Plan, the requirements for SEA, AA and the timescale for its preparation. Implementation mechanisms and monitoring structures for the Plan should also be established.*

The region has ample resources of wind, solar and ocean energy to provide a significant amount of renewable energy. Over the next ten years there is a predicted growth in electricity demand to align with the Climate Action Plan. Extra generating capacity will be required to accommodate this demand. Wind energy is recognised as a major source of renewable energy generation capable of providing clean electricity to the grid and meeting the county's energy needs.

> *"The RSES recognises and supports the many opportunities for wind as a major source of renewable energy. Opportunities for both commercial and community wind energy projects should be harnessed, having regard to the requirements of DoHPLG Guidelines on Wind Energy. Wind Energy technology has an important role in delivering value and clean electricity for Ireland."*

The following Regional Policy Objectives have been listed with regard to renewable energy:

- ***RPO 95 Sustainable Renewable Energy Generation:*** *It is an objective to support implementation of the National Renewable Energy Action Plan (NREAP), and the*

Offshore Renewable Energy Plan and the implementation of mitigation measures outlined in their respective SEA and AA and leverage the Region as a leader and innovator in sustainable renewable energy generation.

- ***RPO 97 Power Stations and Renewable Energy:*** *It is an objective to support the sustainable technology upgrading and conversion of power stations in the Region to increase capacity for use of energy efficient and renewable energy sources.*
- ***RPO 98 Regional Renewable Energy Strategy:*** *It is an objective to support the development of a Regional Renewable Energy Strategy with relevant stakeholders.*
- ***RPO 99 Renewable Wind Energy:*** *It is an objective to support the sustainable development of renewable wind energy (on shore and off shore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.*
- ***RPO 100 Indigenous Renewable Energy Production and Grid Injection:*** *It is an objective to support the integration of indigenous renewable energy production and grid injection.*

Regional Policy Objectives 95 – 100 reflect the strong support for renewable energy throughout the RSES. The Proposed Lifetime Extension will continue to generate renewable electricity contributing to the objectives of the RSES. The Proposed Lifetime Extension is therefore in alignment with policy at a regional level.

The RSES also acknowledges the need to develop a strong grid to support the integration of renewable energy on to the national electricity grid. The RSES sets out a number of infrastructural RPOs, relevant to the Proposed Lifetime Extension which indicate that the Region's continued support and investment in renewable energy generation:

- ***RPO 220 Integrated Single Electricity Market (I-SEM):*** *It is an objective to support the Integrated Single Electricity Market (I-SEM) as a key priority for the Region and seek the sustainable development and reinforcement of the energy grid including grid connections, transboundary networks into and through the Region and between all adjacent Regions subject to appropriate environmental assessment and planning processes.*
- ***RPO 221 Renewable Energy Generation and Transmission Network:*** *a. Local Authority City and County Development Plans shall support the sustainable development of renewable energy generation and demand centres such as data centres which can be serviced with a renewable energy source (subject to appropriate environmental assessment and the planning process) to spatially suitable locations to ensure efficient use of the existing transmission network; b. The RSES supports strengthened and sustainable local/community renewable energy networks, micro renewable generation, climate smart countryside projects and connections from such initiatives to the grid. The potential for sustainable local/community energy projects and micro generation to both mitigate climate change and to reduce fuel poverty is also supported, The RSES supports the Southern Region as a Carbon Neutral Energy Region.*
- ***RPO 222 Electricity Infrastructure:*** *It is an objective to support the development of a safe, secure and reliable supply of electricity and to support and facilitate the development of enhanced electricity networks and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this plan under EirGrid's (2017) Grid Development Strategy (subject to appropriate environmental assessment and the planning process) to serve the existing and future needs of the Region and strengthen all-island energy infrastructure and interconnection capacity.*

2.7.2.2 Proposed Offsetting Measures

The Southern Regional Assembly ('SRA') was established in 2015, the Regional Spatial and Economic Strategy ('RSES') provides a high-level development framework for the Southern Region. The RSES

came into effect on 31st January 2020. It provides a 12-year strategy to deliver the transformational change that is necessary to achieve the objectives and vision of the Assembly.

The following policy objectives that relate to the Proposed Offsetting Measures within the RSES are as follows:

- ***RPO 117 Flood Risk Management and Biodiversity:*** *It is an objective to avail of opportunities to enhance biodiversity and amenity and to ensure the protection of environmentally sensitive sites and habitats, including where flood risk management measures are planned. Plans and projects that have the potential to negatively impact on Natura 2000 sites are subject to the requirements of the Habitats Directive.*
- ***RPO 126 Biodiversity:***
  - *b. Support local authorities acting together with relevant stakeholders in implementing measures designed to identify, conserve and enhance the biodiversity of the Region; seek and support the implementation of the All-Ireland Pollinator Plan, National Biodiversity Action Plan and National Raised Bog SAC Management Plan;*
  - *e. Support local authorities to work with all stakeholders to conserve, manage and where possible enhance the Regions natural heritage including all habitats, species, landscapes and geological heritage of conservation interest and to promote increased understanding and awareness of the natural heritage of the Region.*

The RSES supports the Proposed Offsetting Measures as RPO 117 above supports enhancing biodiversity and protecting sensitive habitats, especially where flood risk managements will be in place. RPO126 also promotes the collaboration between local authorities and stakeholders in order to conserve and improve the biodiversity of an area.

2.7.3 Project Compliance with National and Regional Policy Context

2.7.3.1 Proposed Lifetime Extension

With regard to the above planning framework in place, the proposal to continue generating renewable energy from an existing operational wind farm is clearly supported at national and regional levels. The National Planning Framework calls for proactive responses to the growing population, and so growing energy demands. Given this projected population increase, it is considered that if the share of renewable energy onto the grid is not increased, Ireland will fail to reach the National and International targets on emission reductions. Should the Proposed Lifetime Extension be granted planning permission, the existing wind turbines will continue to contribute to Ireland's national targets and support the country in meeting its renewable energy and carbon emission reduction goals at the EU level, generating approx. 25MW to the national grid. The Proposed Lifetime Extension is directly supported by National Planning Objective 21, 54, and 55. At regional level, Regional Policy Objectives 95 – 100 reflect the strong support for renewable energy within the Region. The Proposed Lifetime Extension, if granted planning permission, will continue to generate renewable electricity thus contributing to the objectives of the RSES.

2.7.3.2 Proposed Offsetting Measures

At the national level, the Revised NPF outlines several policy objectives that are relevant to the Proposed Offsetting Measures. These include the conservation and restoration of biodiversity, the integration of biodiversity considerations into land use planning, and the enhancement of protected areas. The Proposed Offsetting Measures aligns with these objectives by restoring habitats and supporting the conservation of the hen harrier.

Regionally, the Southern Regional Assembly's RSES supports biodiversity enhancement and the protection of Natura 2000 sites. The Proposed Offsetting Measures aligns with regional objectives by enhancing biodiversity and promoting collaboration among stakeholders.

2.7.4 Local Policy Context

2.7.4.1 Proposed Lifetime Extension

Cork County Development Plan

The Cork County Development Plan 2022-2028 (CCDP) came into effect on 6th June 2022 and was also subject to a Ministerial Direction in accordance with section 31(4)(c) of the Planning and Development Act 2000, as amended however the requirements of this Direction did not relate to renewable energy and has no impact on the Proposed Lifetime Extension subject of this EIAR.

There is policy support at local level for the development of renewable energy projects in County Cork in accordance with the Cork County Development Plan 2022-2028. **Objective ET 13-1** aims to "*Ensure that County Cork fulfils its potential in contributing to the sustainable delivery of a diverse and secure energy supply and to harness the potential of the county to assist in meeting renewable energy targets and managing overall energy demand".*

Objective ET 13-2 of the CCDP states that the Council will aim to "*Support Ireland's renewable energy commitments as outlined in Government Energy and Climate Change policies by facilitating the development of renewable energy sources such as wind, solar, geothermal, hydro and bio-energy and energy storage at suitable locations within the county where such development has satisfactorily demonstrated that it will not have adverse impacts on the surrounding environment (including water quality), landscape, biodiversity or amenities" and "Support and facilitate renewable energy proposals that bring about a direct socio-economic benefit to the local community".*

Objective ET 13-4 of the Plan is considered particularly important in the consideration of the Proposed Lifetime Extension, as it offers clear support for the policy direction and sentiments being expressed at upper levels in the policy hierarchy (outlined above) and clearly states the Council are supportive of onshore wind:

> *"In order to facilitate increased levels of renewable energy production consistent with national targets on renewable energy and climate change mitigation as set out in the National Energy and Climate Plan 2021-2030, the Climate Action Plan 2021, and any updates to these targets, and in accordance with Ministerial Guidelines on Wind Energy Development, the Council will support further development of on-shore wind energy projects including the upgrading, repowering or expansion of existing infrastructure, at appropriate locations within the county in line with the Wind Energy Strategy and objectives detailed in this chapter and other objectives of this plan in relation to climate change, biodiversity, landscape, heritage, water management and environment etc"* (our emphasis added).

It is the case that within the County Development Plan the Site is within an area where wind energy is deemed '*Normally Discouraged*'. The nature of the proposal is such that no construction works are proposed and no new infrastructure proposed; the aim is to simply ensure the turbines which currently exist onsite and currently contribute to the amount of renewable energy generated in the County, can continue. The precise wording of the relevant Objective, **Objective ET 13-5: Wind Energy Projects** is:

"(a)*supports a plan led approach to wind energy development in County Cork through the identification of areas for wind energy development. The aim in identifying these areas is to ensure that there are minimal environmental constraints, which could be foreseen to arise in advance of the planning process.*

b) On-shore wind energy projects should focus on areas considered 'Acceptable in Principle' and 'Areas Open to Consideration' and generally avoid "Normally Discouraged" areas as well as sites and locations of ecological sensitivity". **Objective ET 13-8: Normally Discouraged** states that *"Commercial wind energy developments will be discouraged in these areas which are considered to be sensitive to adverse impacts associated with this form of development (either individually or in combination with other developments). Only in exceptional circumstances where it is clear that adverse impacts do not arise will proposals be considered."*

There is no objective or policy provision in the County Development Plan regarding sites such as the application site, where extending the operational life of the wind farm is wholly viable, and represents clear alignment with the wider planning policy framework.

Objective ET13-9: National Wind Energy Guidelines is also relevant to the proposal. It states:

> *"Development of on-shore wind should be designed and developed in line with the 'Planning Guidelines for Wind Farm Development 2006' and 'Draft Wind Energy Development Guidelines 2019" and any relevant update of these guidelines."*

Objective ET13-10: Development in line with Best Practice seeks to "*Ensure that wind energy developments in County Cork are undertaken in observance with best industry practices, and with full engagement of communities potentially impacted by the development. In accordance with the Code of Practice 'Good Practice for Wind Energy Development Guidelines 2016', wind energy development operators are required to put in place an effective complaints procedure in relation to all aspects of wind energy development projects, where members of the public can bring any concerns they have about operational difficulties, including noise and nuisance to the attention of the wind energy development operator."*

2.7.4.2 Proposed Offsetting Measures

Kerry County Development Plan 2022-2028

The Kerry County Development Plan 2022-2028 (KCDP) was adopted by the elected members of Kerry County Council (KCC) on the 4th of July 2022. Chapter 11 sets out the relevant policy in relation to the environment within the County. The KCDP highlights that over 40% of County Kerry is designated under the Natura 2000 network, representing the significance of the County's natural heritage and diverse and varied biodiversity. The policies included in the CCDP that are relevant to the Proposed Offsetting Measures include:

> ***KCDP 11-2****: Maintain the nature conservation value and integrity of Special Areas of Conservation, Special Protection Areas, Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs). This shall include any other sites that may be designated at national level during the lifetime of the plan in co-operation with relevant state agencies.*
>
> ***KCDP 11-3:*** *Work with all stakeholders in order to conserve, manage and where possible enhance the County's natural heritage including all habitats, species, landscapes and geological heritage of conservation interest and to promote increased understanding and awareness of the natural heritage of the County.*
>
> ***KCDP 11-22:*** *Encourage and facilitate the retention and creation of features of local biodiversity value, ecological corridors and networks that connect areas of high conservation value such as watercourses, woodlands, hedgerows, earth banks and wetlands.*

The Proposed Offsetting Measures seeks to enhance and manage the Proposed Offsetting Lands for hen harrier in the townlands of Coom and Knockatee, County Kerry.

Kerry County Council's Biodiversity Action Plan 2022-2028

Kerry County Council's Biodiversity Action Plan 2022-2028 (KBAP) forms part of Volume 6 of the KCDP. The key objectives within the KBAP which relate to the Proposed Offsetting Measures are as follows:

- ***Objective 2:*** *To conserve, protect and enhance biodiversity and ecosystem services in the county*
- ***Objective 4:*** *Work with a range of stakeholders to ensure protection and enhancement of biodiversity in the*

The Proposed Offsetting Measures align with the KBAP as it seeks to restore habitat for the benefit of hen harrier and will improve biodiversity in the Proposed Offsetting Lands.

2.7.5 Project Compliance with Local Policy

2.7.5.1 Proposed Lifetime Extension

It is recognised that the Proposed Lifetime Extension is not located within an area which wind energy projects are deemed to be 'Acceptable in Principle' and 'Areas Open to Consideration'. It is the case, however, that the CCDP expresses its support for the development of wind energy and seeks to align with the national objective of delivering Ireland's legally binding targets with regard to an increased renewable energy share that will allow Ireland to obtain 80% of its electricity needs from renewable energy by 2030.

This legally binding obligation on Ireland to achieve ambitious renewable energy targets means that every project is of national importance in this regard. Given the urgent timelines within which our renewable energy targets must be achieved by delivering this form of energy onto the grid, it is important that existing wind energy projects are recognised as being of strategic importance and in the national interest in this regard.

Local authorities have an obligation under the Climate Action and Low Carbon Development Act 2015 as amended (the Climate Act) to exercise their development plan functions '*in a manner consistent with'* the National Climate Policies and Objectives as far as practicable.

Section 15 (1) of the Climate Act provides that:

> *"A relevant body shall, in so far as practicable, perform its functions in a manner consistent with— (a) the most recent approved climate action plan, (b) the most recent approved national long term climate action strategy, (c) the most recent approved national adaptation framework and approved sectoral adaptation plans, (d) the furtherance of the national climate objective, and (e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State." (the "National Climate Policies and Objectives")*

The Taurbeg Wind Farm has been in operation for over 18 years. It has the potential to continue generating, without any additional works at the site, for a further 10 years. This ability to contribute directly to other objectives of the Plan which, in light of national and European frameworks, is considered paramount.

The project has the ability to continue to deliver over 25MW to the national grid in the form of green, renewable energy and in this regard can be seen to be of national importance as Ireland seeks to achieve its legally binding renewable electricity targets. The project will have significant environmental benefits in terms of its direct contribution to crucial decarbonisation and climate change mitigation targets.

2.7.5.2 Proposed Offsetting Measures

Locally, the Kerry County Development Plan (2022–2028) emphasise the importance of biodiversity conservation, climate resilience, and sustainable development. The Proposed Offsetting Measures are consistent with these plans, particularly in their focus on enhancing habitats for the hen harrier and supporting climate adaptation.

2.8 Other Relevant Material Considerations

2.8.1 Proposed Lifetime Extension

DoEHLG Wind Energy Guidelines 2006

In June 2006, the then Department of Environment, Heritage and Local Government (DoEHLG) published 'Wind Energy Development Guidelines for Planning Authorities' (the 'DoEHLG 2006 Guidelines') under Section 28 of the Planning and Development Act, 2000, as amended. The aim of these guidelines was to assist the proper planning of wind power projects in appropriate locations around Ireland. The DoEHLG 2006 Guidelines highlight general considerations in the assessment of all planning applications for wind energy. They set out advice to planning authorities on planning for wind energy through the development plan process and in determining applications for planning permission. They contain guidelines to ensure consistency of approach throughout the country in the identification of suitable locations for wind energy development.

Each wind project has its own characteristics and defining features, and it is therefore impossible to write specifications for universal use. Guidelines should be applied practically and do not replace existing national energy, environmental and planning policy.

Draft Revised Wind Energy Guidelines 2019

The Department of Housing, Planning and Local Government published the Draft Wind Energy Guidelines (referred to as the 'Draft 2019 Guidelines') in December 2019. The Draft 2019 Guidelines were open to public submissions up until the 19th of February 2020.

The Draft 2019 Guidelines clearly sets out the recognition that the proper planning and sustainable development of areas and regions must be taken into account when local authorities prepare their development plans and assess planning applications, irrespective of the significant role renewable energy has to play in tackling climate change.

The Draft 2019 Guidelines note that potential impacts of wind energy development proposals on the landscape, including the natural and built environment, must be considered along with the legitimate concerns of local communities. With this in mind, and in line with the previously stated "preferred draft approach", the Draft 2019 Guidelines primarily focus on addressing a number of key aspects including, but not limited to:

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

Under the consultation it was evident that a number of submissions made appeared to have observations surrounding similar points, these include but are not limited to themes such as noise, visual amenity set back and shadow flicker.

At time of writing the Draft 2019 Guidelines are not yet finalised and are not in force, with the relevant guidelines for the purposes of section 28 of the Planning and Development Act 2000, as amended, remaining those published in 2006.

Engagement - Best Practice Guidelines

IWEA Best Practice Guidelines for the Irish Wind Energy Industry 2012

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

IWEA Best Practice Principles in Community Engagement and Community Commitments 2013

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

Further details on the community engagement that has been undertaken as part of the Proposed Project are presented below.

DCCAE Code of Practice for Wind Energy Development Ireland – Guidelines for Community Engagement 2016

In December 2016, the Department of Communications, Climate Action and Environment (DCCAE) issued a Code of Practice for wind energy development in relation to community engagement. The Code of Good Practice is intended to ensure that wind energy development in Ireland is undertaken in adherence with the best industry practices, and with the full engagement of local communities.

Community engagement is required through the different stages of a project, from the initial scoping, feasibility and concept stages, right through construction to the operational phase. The methods of engagement should reflect the nature of the project and the potential level of impact that it could have on a community. The guidelines advise that ignoring or poorly managing community concerns can have long-term negative impacts on a community's economic, environmental or social situation. Not involving communities in the project development process has the potential to impose costly time and financial delays for projects or prevent the realisation of projects in their entirety.

2.8.2 Proposed Offsetting Measures

Biodiversity Climate Change Sectoral Adaptation Plan

The Biodiversity Climate Change Sectoral Adaptation Plan considers terrestrial, freshwater and marine biodiversity and ecosystem services. The goal is to protect biodiversity from the impacts of climate change and to conserve and manage ecosystems so that they deliver services that increase the adaptive capacity of people and biodiversity. This is aimed to be achieved through following the six key objectives set out in the plan:

- **Objective 1: Protect, restore and enhance biodiversity to increase the resilience of natural and human systems to climate change** is supported by actions including implementation of the All Island Pollinator Plan, building on the EPA soil protection strategy, rejuvenation of Invasive Species Ireland, consideration of coastal zone management that will be embedded in relevant policies including the National Marine Planning Framework (Ireland's National Marine Spatial Plan), the incentivisation of farmers and land owners to protect biodiversity and the use of existing data to inform future management.
- **Objective 2: Improve understanding of the impacts of climate change on biodiversity.** The action that underpins all others for this objective is the execution of a comprehensive vulnerability assessment of biodiversity in Ireland, including a priority impact assessment to determine the factors that contribute to exposure and sensitivity and to identify the most at-risk species and habitats for priority attention.
- **Objective 3: Improve landscape connectivity to facilitate mobility in a changing climate.** The actions under this Objective will determine what species and habitats are vulnerable to fragmentation and look at ways of enhancing connectivity across the landscape and reducing barriers to movement. The connectivity of coastal and marine protected areas will also be considered.
- **Objective 4: Engage society and all sectors to protect biodiversity to enhance resilience.** Engaging the public, schools, businesses and local community organisations will be key to creating a better understanding of the impacts of climate change on biodiversity and to building support for investment in biodiversity as a key asset in resilience building. Designing and managing green and blue spaces that allow people to enjoy nature, while sequestering carbon and increasing resilience is a win-win for biodiversity, human health, eco-tourism and climate action.
- **Objective 5: Ensure sufficient financing is available to implement the Biodiversity Climate Change Adaptation Plan.** A financial strategy will be developed to address the finance gap combining suitable and nationally adapted mechanisms and to achieve cross departmental buy-in. A Policy and Institutional Review will analyse positive and negative policies and subsidies to fully outline the challenge of not only mobilising finance, but of ensuring policy and environmental fiscal reform
- **Objective 6: Put adequate monitoring and evaluation measures in place to review the implementation of the Biodiversity Climate Change Adaptation Plan.** The first and underpinning action for this objective is to collate and cross-reference actions in other sectoral plans to realise synergies, avoid maladaptation actions and monitor their contribution to this Plan

The Proposed Offsetting Measures are in accordance with this policy as new habitats will be created for hen harrier, whilst strengthening the surrounding ecosystem and protecting vulnerable species. The Proposed Offsetting Measures will also deepen the understanding of how climate change impacts certain bird species.

Hen Harrier Threat Response Plan 2024-2028

The Hen Harrier Threat Response Plan 2024-2028 was published by the National Parks and Wildlife Service (NPWS) in September 2024. As per the published document, *the aim of the Hen Harrier Threat Response Plan is to improve the long-term prospects for the species and to meet the objectives of the Birds Directive by:*

- *synthesising the key scientific evidence for the hen harrier population decline,*
- *outlining the views and concerns presented by the relevant sectors,*
- *laying out a coordinated set of targeted actions and measures to cease, avoid, reverse, reduce, eliminate or prevent the identified threats, pressures and hazards.*

The Threat Response Plan details 47 actions across five areas: Cross-cutting Sectoral Actions, Agriculture, Forestry, Wind Energy and Review & Update. The broad topics included under Wind Energy are copied below:

- Informing assessment procedures with fit for purpose data construction monitoring actions.
- Improving access to data.
- Promoting effective cumulative level assessments, including collision risk modelling, at various scales.
- Efficacy of adaptive management measures, including for offsetting purposes.
- Robustness of Environmental Assessments.
- Wind Energy Development Guidelines.
- Early identification of potential problems.
- Collation of relevant planning documents.
- Promoting high quality assessments.

The Proposed Offsetting Measures are aligned with the above policy as it supports the targets to improve the long-term survival of hen harrier. Habitat restoration also directly supports the plans as it will contribute to biodiversity conservation.

NPWS Conservation Objectives Supporting Document: Breeding Hen Harrier

The National Parks and Wildlife Service published a detailed Conservation Objectives Supporting Document for breeding hen harrier in September 2022. The Targets detailed in the document for the SPA network are copied below, as are the specific targets for the Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA where relevant:

- The SPA network Target for the attribute 'population size' is to restore the numbers of confirmed breeding pairs to at least 77 – 78 confirmed breeding pairs.
  - Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA = Restore the numbers of confirmed breeding pairs to at least 38–39 confirmed breeding pairs.
- The SPA network Target for the 'productivity rate' is at least 1.0–1.4 fledged young per confirmed pair.
  - Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA = Maintain at least 1.0 – 1.4 fledged young per confirmed pair.
- The Target for 'spatial utilisation of breeding pairs' is at least 86% of the total SPA network area.
  - Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA = Restore the spatial utilisation of the SPA by breeding pairs to at least 97–98%
- For the SPA network, the Target for the attribute 'extent and condition of heath and bog' is to restore the extent and quality of this resource to support the targets relating to population size, productivity rate and spatial utilisation.

- For the SPA network, the Target for the attribute 'extent and condition of low-intensity managed grassland habitat' is to restore the extent and quality of this resource to support the targets relating to population size, productivity rate and spatial utilisation.
- The Target for the SPA network is to maintain, at least, the length and quality of this resource to support the targets relating to population size, productivity rate and spatial utilisation.
- The SPA network Target for the attribute 'age structure of the forest estate' is to achieve an even and consistent distribution of age-classes across the forest estate.
- The Target for the SPA network is that disturbance occurs at levels that do not significantly impact upon breeding hen harrier.

The Proposed Offsetting Measures are supported by this policy as it should help to increase the number of hen harrier breeding pairs, in line to meet the targets listed above. Habitat restoration is essential to achieving the targets in this policy document.

2.9 Planning History

This Section of the EIAR sets out the relevant planning history of the Proposed Lifetime Extension (CCC) site and the Proposed Offsetting Lands (KCC) and also identifies wind energy developments within the wider area (20km from the existing Taurbeg Wind Farm turbines).

2.9.1 Planning Applications within the Proposed Lifetime Extension application site boundary

A planning search was carried out through CCC's online planning portal in July 2025 for relevant valid planning applications within the red line planning application site boundary. 4 no. planning permissions were identified within the red line planning application boundary. All planning applications relate to the existing Taurbeg Wind Farm. The planning applications within the red line boundary are outlined in the table below.

Table 2-3: Planning Applications within the Site Boundary (Turbines)

Pl. Ref:	Description	Decision
16/6366	To amend Condition No. 7 of windfarm development permitted under planning Reg No. 02/3608 which specified that 'the structures shall be removed at the expiration of a period of 20 years beginning on the date of commissioning of the development to allow for a period of 25 years from the date of commissioning instead of 20 years specified in the condition and extend the permitted operational lifetime of the Taurbeg Windfarm for a period of 5 years (2026-2031) and Permission for the clear felling of approximately 0.15ha of existing conifer plantation and the replanting of same	Refused by CCC, 18.11.2016
05/602	Borrow pit to win road stone for on site access tracks associated with construction of wind farm permitted under Reg. No.02/3608, and a short section of access track	Granted by CCC, 09.05.2005
01/6549	Erection of 10.88km of 38KV overhead line	Granted by CCC, 06.03.2002

02/3608	Windfarm to include 14 turbines, anemometer mast, control room/substation, temporary site compound/control room, access tracks and ancillary works	Granted by CCC, 07.04.2003

2.9.2 Planning Applications within the Proposed Offsetting Lands application site boundary

A planning search was carried out through KCC's online planning portal in July 2025 for valid planning applications within or overlapping with the boundary of the Proposed Offsetting Lands red line planning application site boundary. Only 1 no. application was found to overlap marginally with the site boundary, as detailed below in Table 2-4. This application dates from 1998 and relates to a wind farm, however development was not carried out under this permission. The planning permission has since expired.

Table 2-4: Planning Applications within the Site Boundary (Proposed Offsetting Lands)

Pl. Ref:	Description	Decision
9811	Erect a wind farm incorporating 23 turbines, a control house, anemometer station and service rods for same	Granted KCC, 23.11.1998; Granted by ACP (PL08.109598) 16.09.1999

2.9.3 Wind Energy Developments within 20km of the existing Taurbeg Wind Farm Turbines

A planning search was carried out to establish permitted and operational wind farms within 20km of the existing Taurbeg Wind Farm turbines. The search was carried out using the relevant local authority planning portals and An Coimisiún Pleanála's portal in July 2025 for relevant planning applications.

Table 2-5: Wind Energy Developments within 20km of the existing Taurbeg Wind Farm turbines

Name	Planning Ref	Description	County	Decision	Status	No. Of Turbines
Ballagh Wind Farm	Pl. Ref. 06/128	Construction of a wind farm consisting of three wind turbines, electric substation with control building, meteorological pole, construction, extension and upgrading of existing internal site tracks and associated work. An EIS has been submitted as part of this application	Limerick	Granted	Operational	2
	ACP PL13.223648	Third Party Appeal Construction of a wind farm consisting of three wind turbines, electric substation with control building, meteorological pole, construction, extension and upgrading of existing internal site tracks and associated work. An EIS has been submitted as part of this application	Limerick	Granted by ACP	N/A	-
	EOD Ref: 12/7135	06/128-construction of a wind farm consisting of three wind turbines, electric substation with control building, meteorological pole, construction, extension and upgrading of existing internal site tracks and associated work. An EIS has been submitted as part of this application	Limerick	Granted	N/A	-
Coolleagrean Wind Farm	Pl. Ref: 06/1489	Erect a wind farm consisting of 7 no. Wind turbines with a hub height of up to 70m approximately and a propeller radius of up to 40m approximately, 50m height wind monitoring mast, access roads, and ESB substation and ancillary site works. An EIS has been submitted as part of the application	Kerry	Granted	Operational	7
	EOD Ref: 06/91489	Extension of Duration - Erect a wind farm consisting of 7 no. Wind turbines with a hub height of up to 70m approx. And a propeller radius of up to 40m approx., 50 m height wind monitoring mast, access roads and ESB substation and ancillary site works	Kerry	Granted by KCC – for an additional 5 years. Permission will expire	N/A	-

Name	Planning Ref	Description	County	Decision	Status	No. Of Turbines
				on the 31.01.2017		
	Pl. Ref: 17/1193	Continue use of existing wind farm granted under planning ref 06/1489 and 06/91489 for a further period of five years to extend the operational life of the existing wind farm from 20 to 25 years. An environmental impact assessment report (EIAR) and a natura impact statement will be submitted to the planning authority with this application	Kerry	Granted 02.05.2018, expiry 01.05.2023	N/A	-
Cordal Wind Farm	Pl. Ref: 10/692	Construct a windfarm comprising 28 no. wind turbine generators with a maximum hub height of 90m, a maximum rotor diameter of 90m, a maximum rotor diameter of 90m and a maximum hub overall height of 135m, an electrical substation compound, control building, anemometer (2 no.) and associated site infrastructure including site roads, crane hardstandings and underground cabling. an environmental impact statement will be submitted with this application	Kerry	Refused	N/A	N/A
	ACP PL08.239473	First Party Appeal against the decision by KCC to refuse permission	Kerry	Granted by ACP	Operational	28
Dromcoliher Wind Turbine	Pl. Ref: 12/281	Retention permission for existing wind turbine (27.13m in height) and Permission for the construction of a lean-to machinery store extension to existing agricultural machinery store/workshop, upgrading of existing agricultural entrance and all associated site works	Limerick	Granted	Operational	1
Dromdeeveen Wind Farm	Pl. Ref: 02/1871	Construction of wind farm comprising wind turbines and switchyard	Limerick	Granted	Operational	7
	Pl. Ref: 04/2722	Erection of windfarm comprising of increased dimensions for 7 previously permitted wind turbines, 11 additional turbines, anemometer mast and access tracks. An EIS has been submitted as part of this application.	Limerick	Granted	Operational	7
Glentane Wind Farm/Glentanemacelligot Wind Farm 1	Pl. Ref: 02/4283	Windfarm to include 6 no. wind turbines, 2 no. 50m meteorological masts, substation/control building site tracks & assoc. works	Cork	Granted	Operational	6
	Pl. Ref: 06/4077	Modification to permitted development 02/4283 to include 6 no. turbines, hub height of 80m and blade diameter of 90m and blade tip height of	Cork	Granted	N/A	-

Name	Planning Ref	Description	County	Decision	Status	No. Of Turbines
		125m, 2 no. 80m high wind monitoring masts, ESB substation compound with control building, site tracks and associated site development works				
	Pl. Ref: 10/8024	Completion of 6 no. turbines of hub height 80m and blade diameter of 90m and blade tip height of 125m, 2 no. 80m high wind monitoring masts, ESB substation compound with control building, site tracks and associated site development works as granted under Planning Reg. no. 06/4077	Cork	Granted	N/A	-
Glentane Wind Farm/Glentanemacelligot Wind Farm 2	Pl. Ref: 08/10248,	Erection of 8 no. wind turbines with hub height of 80m, blade diameter of 90m and overall height from ground to blade tip of 125m, construction of 4 no. borrowpits and internal site tracks and associated works	Cork	Granted	Operational	5
	ACP PL.04.235930	Third Party Appeal - Erection of 8 no. wind turbines with hub height of 80m, blade diameter of 90m and overall height from ground to blade tip of 125m, construction of 4 no. borrowpits and internal site tracks and associated works	Cork	Granted with revised conditions removing turbines 11, 12 and 13 (i.e. 5 in total granted)	N/A	-
Gortnacloghy Wind Farm	Pl. Ref: 04/3021,	construction of wind farm consisting of 2 no. wind turbines (hub height 80m), an electrical substation with control building, internal site track walls and associated site works	Limerick	Granted	Operational	2
	Pl. Ref: 11/7115	Additional period of 5 years for the completion of the construction of a wind farm consisting of 2 no. wind turbines, an electrical substation with control building, internal site trackways and associated works	Limerick	Granted with an expiry of 26.01.2017	N/A	-
Kilberehert Wind Farm	Pl. Ref: 10/5791	Wind farm consisting of 3 no. wind turbines with 80 metre hub heights and 90 metre rotors (125 metre tip heights), a sub-station, upgrading of existing farm tracks and construction of new access tracks and all ancillary works	Cork	Granted	Operational	3

Name	Planning Ref	Description	County	Decision	Status	No. Of Turbines
Knockacummer Wind Farm	Pl. Ref: 04/8354,	29 no. wind turbines (hub height 80 m, blade diameter 90 m), electrical sub station with control building, 2 no. 80 m high meteorological masts, construction and extension of internal site tracks and associated works.	Cork	Granted	Operational	29
	ACP PL.04.210685	Third Party Appeal against the decision to grant permission for 29 no. wind turbines (hub height 80 m, blade diameter 90 m), electrical sub station with control building, 2 no. 80 m high meteorological masts, construction and extension of internal site tracks and associated works.	Cork	Granted by ACP	N/A	-
	Pl. Ref: 10/5211	Completion of construction of 29 no. wind turbines, 2 no. meteorological masts, electrical substation, construction and upgrading of internal site tracks and associated works granted under pl.reg.no. 04/8354 (New permission to expire on 22/12/2014)	Cork	Granted	N/A	-
Knockawarriga Wind Farm 1	Pl. Ref: 02/1937	Construction of a windfarm consisting of 9 wind turbines (hub height 67m, blade diameter 80m), an electrical substation with control building, one 50m high meteorological mast and construction and extension of existing internal site tracks and associated works	Limerick	Granted	Operational	9
	Pl. Ref: 04/1289	an increase of the turbine hub height from 67m to 80m and an increase of the blade tip height from 107m to 120m in the existing planning permission for a wind farm ref. 02/1937	Limerick	Granted	N/A	-
Knockawarriga Wind Farm 2	Pl. Ref: 12/459	a windfarm which comprises of 5 no. turbines (hub height 80m, blade rotor diameter not exceeding 93m, blade tip not exceeding 126.5m), construction of 2.94km approx. of additional new access roads, a borrow pit, 3 no. attenuation ponds and associated site development works. The proposed windfarm forms the second phase of, and is located adjacent to, an existing operational windfarm known as Knockawarriga (permitted under 02/1937 & 04/1289). Vehicular access to the development will be via 2 no. access points from the public road L-7044 as follows; a new access from the L-7044 to serve 4 no. of the proposed turbines, and a repositioned access from the L-7044 to serve the existing windfarm permitted under 02/1937 and 1 no. of the proposed new turbines. The period during which the permission will have effect (the appropriate	Limerick	Refused	N/A	N/A

Name	Planning Ref	Description	County	Decision	Status	No. Of Turbines
		period) is sought for 10 years. An Environmental Impact Statement and a Natura Impact Statement are submitted as part of this application				
	ACP PL13.242166	First Party Appeal against the decision by LCC to refuse permission	Limerick	Granted by ACP with revised conditions limiting development to 3 turbines only	Operational	3
Mauricetown /Ashford Wind Farm	Pl. Ref: 12/379	10 year permission for retention and completion for the construction, operation and decommissioning of up to 6 no. wind turbines and ancillary works.	Limerick	Refused	N/A	-
	ACP PL13.240910	First Party Appeal against the decision to refuse planning permission	Limerick	Granted	Operational	6
Mount Eagle Wind Farm	Pl. Ref: 01/3884,	Construct a windfarm consisting of 8 no. 850kw wind turbines with hub heights of 44m and a rotor diameter of52m and associated works, with EIS	Kerry	Granted	Operational	8
	Pl. Ref: 01/93884	Extension to the existing wind farm, comprising 2 no turbines (no substation)	Kerry	Granted	Granted, not built	-
Rathcahill Wind Farm	Pl. Ref: 07/281	Erection of 6 no. wind turbines, electrical substation and control building, construction and upgrading of site trackways and associated site works. Previous planning ref. 01/2486 & 02/777	Limerick	Granted	Operational	5
Scartaglen Wind Farm 1	Pl. Ref: 13/114	Construct a wind farm including twelve (12) no. Wind turbines (with a maximum height of up to 126.5m), one (1) no. Permanent meteorological mast, (1) no. Substation, the provision of new and upgraded internal site service roads, underground cabling and all associated infrastructure. The proposed development would entail the construction of 12 no. Wind turbines which would be higher than the 12 no. Turbines previously	Kerry	Granted	Operational	11

Name	Planning Ref	Description	County	Decision	Status	No. Of Turbines
		granted planning permission on the site under planning register nos. 08/1675,08/2030, and 09/1284. A ten year planning permission is being sought to construct the development. An environmental impact statement and natura impact statement have been prepared in respect of this application				
Scartaglen Wind Farm 2	Pl. Ref: 13/725	Construct an extension to a permitted twelve turbine wind farm development (planning ref 13/114). The development will consist of six wind turbines (hub height up to 85m and maximum blade tip height of up to 126.5 m), upgrading of existing access roads, construction of additional access roads, further development of two existing borrow pits on the site and associated ancillary works. Development previously granted under Kerry county council planning ref 13/114 will facilitate the proposed extension to the wind farm. Planning permission is being sought for a ten year period. An environmental impact statement (EIS) and natura impact statement (nis) accompany the application	Kerry	Granted	Operational	4
Tournafulla Wind Farm	Pl. Ref: 01/406,	Construction of a wind farm consisting of 17 turbines (65m Hub Height) electrical substation with control building, 50m high meteorological mast, construction and upgrading of site entrances, site trackways and associated works	Limerick	Granted	Operational	17
	Pl. Ref: 02/147	Construction of one wind turbine (65 metres hub height), an electrical metering station and site trackway	Limerick	Granted	Operational	1
	Pl. Ref: 04/3386	Modifications to planning ref. 01/406 consisting of a change in type and location of the lattice meteorologist mast and location of turbine no. 17, construction of site trackways and associated site works	Limerick	Granted	N/A	-
	Pl. Ref: 06/2455	Extension of planning permission ref: 01/406 (granted 13.09.2001)	Limerick	Granted, permission to expire on the 12th of September 2010	N/A	-

Name	Planning Ref	Description	County	Decision	Status	No. Of Turbines
WED Cross	Pl. Ref: 06/12438	Construction of 2 no. wind turbines up to 85m hub height and up to 80m blade diameter, 2 no. transformers, site tracks and associated works	Cork	Granted	Operational	2

It is noted that a single domestic turbine exists at Newmarket, County Cork which is visible on aerial imagery. Given its nature and scale (domestic) is it not considered likely to have a cumulative landscape and visual impact.

2.10 Scoping and Consultation

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

A scoping letter, providing details of the Proposed Project, was prepared by MKO and circulated in February 2024. MKO requested the comments of the relevant personnel/bodies in their respective capacities as consultees with regards to the EIAR process. As part of the constraints mapping process, which is detailed in Chapter 3 of this EIAR, telecommunications operators were contacted in November 2023, January 2024 and February 2024 in order to determine the presence of telecommunications links either traversing or in close proximity to the Site.

2.10.1 Scoping Responses

Table 2-6 lists the responses received from the bodies to the scoping letter circulated. Copies of all scoping responses are included in **Appendix 2-1** of this EIAR. If further responses are received, the comments of the consultees will be considered in the Proposed Project in the event of a grant of planning permission. The recommendation of the consultees has informed the scope of assessments undertaken and the contents of the EIAR.

Table 2-6: Scoping Replies

Consultee Name	Scoping Reply	Summary of Scoping Comment
An Taisce	No response	No response
Bat Conservation Ireland	No response	No response
BirdWatch Ireland	16.02.2024	Requested environmental monitoring reports since the initiation of the wind farm with particular refence to bird monitoring reports. Highlighted Hen Harrier Threat response plan
Butterfly Conservation Ireland (BCI)	No response	No response
Commission for Regulation of Utilities , Water and Energy	No response	No response
Cork Airport	19.08.2024	Automated response
Cork County Council-Environment	01.03.2024	The EIA should document and assess current noise environment and operational noise impact of the proposed development on receiving environment and sensitive receptors. Full descriptive details of all monitoring locations, calculations, assumptions and mitigations. Include assessment of the efficiency of all mitigation measures claimed during original application vis a vis noise, shadow flicker, surface water controls etc. Changes in habitats should be documented including downstream Q values compared to predevelopment Q values.

Consultee Name	Scoping Reply	Summary of Scoping Comment
		Assessment of the change in conservational and/or environmental objectives for sites the development influences. Include an assessment of the impact on bird populations resulting from the developments operational phase, with expert evidence of impact to support continued operations. EIA should provide for the decommissioning phase etc to ensure no legacy waste issues and/or return insofar as precritical to original undisturbed/greenfield state.
Cork County Council – Roads	No response	No response
Cork County Council- Heritage	13.03.2024	Along with addressing landscape and built heritage matters the EIAR shall address the potential impacts of the development upon archaeological heritage and features in the area. The applicant should note Policy Objective HE 16-9 of the County Development Plan 2022 (Archaeology and Infrastructure Schemes) requires that all large-scale planning applications (i.e. development of lands on 0.5 ha or more in area or 1km or more in length) are subjected to an archaeological assessment as part of the planning application process which should comply with the Department of Arts, Heritage and the Gaeltacht's codes of practice. It is recommended that the assessment is carried out following pre-planning consultation with the County Archaeologist, by an appropriately experienced archaeologist to guide the design and layout of the proposed scheme/development, safeguarding the archaeological heritage in line with Development Management Guidelines. Archaeology includes the protection of Archaeological Sites and Recorded Monuments and the assessment of effects of the development upon same should be detailed within the EIAR. The applicant should note the objectives of the CDP 2022 in relation to Archaeology including HE16-9, 16-11, and 16-13.
Cork County Council - Planning	16.02.2024	Acknowledgement of email only
Department of Agriculture, Food and the Marine	14.03.2024	Response received from felling division- The developer should take note of the contents of Felling and Reforestation Policy document which provide a consolidated source of information on the legal and regulatory framework relating to tree felling; It is important to note that when applying to a Local Authority, or An Coimisiún Pleanála, for planning permission where developments are: a) subject to an EIA procedure (including screening in the case of a sub-threshold development) and any resulting requirement to produce an EIAR; and/or b) subject to an Appropriate Assessment procedure (including screening) and any resulting requirement to a Natura Impact Statement (NIS); and c) the proposed development in its construction or operational phases, or any works ancillary thereto,

Consultee Name	Scoping Reply	Summary of Scoping Comment
		would directly or indirectly involve the felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species, 1. that there is a requirement inter alia under the EIA Directive for an overall assessment of the effects of the project or the alteration thereof on the environment to be undertaken, including the direct and indirect environmental impact of the project; and 2. pursuant to Article 2(3) of the EIA Directive, the Department of Agriculture, Food and the Marine strongly recommends that, notwithstanding the fact that a parallel consent in the form of felling licence may also have to be applied for, any EIAR and/or NIS produced in connection with the application for planning permission to the Local Planning Authority or An Coimisiún Pleanála, should include an assessment of the impact of and measures, as appropriate, to prevent, mitigate or compensate for any significant adverse effects direct or indirect identified on the environment arising from such felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species. 3. Please note that there must be absolute spatial consistency between the felling licence areas submitted to DAFM (second authority) and all related planning documents submitted to the first authority in respect of the felling area(s)
Department of Communications, Climate Action and the Environment	No response	No response
Department of Defence	29.08.2024	All turbines should be illuminated by Type C, Medium intensity, Fixed Red obstacle lighting with a minimum output of 2,000 candela to be visible in all directions of azimuth and to be operational H24/7 days a week. Obstacle lighting should be incandescent or, if LED or other types are used, of a type visible to Night Vision equipment. Obstacle lighting used must emit light at the near InfraRed (IR) range of the electromagnetic spectrum, specifically at or near 850 nanometres (nm) of wavelength. Light intensity to be of similar value to that emitted in the visible spectrum of light. Any Irish Air Corps (IAC) requirements for are separate to Irish Aviation Authority (IAA) require. Request that they are kept informed on any progress relating to this proposed development.
Department of Housing, Local Government and Heritage	16.02.2024	Acknowledgement of receipt (ref: GPre00066/2024) only
Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media	No response	No response

Consultee Name	Scoping Reply	Summary of Scoping Comment
Department of Transport, Tourism & Sport	27.02.2024	No observations
EirGrid	No response	No response
Environmental Protection Agency	No response	No response
Failte Ireland	14.03.2024	Issued a copy of Fáilte Ireland's Guidelines for the Treatment of Tourism in an EIA. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2.
Forest Service	14.03.2024	If the proposed development will involve the felling or removal of any trees, the developer must obtain a Felling License from this Department before trees are felled or removed. A Felling Licence application form can be obtained from Felling Section, Department of Agriculture, Food and the Marine. A Felling Licence granted by the Minister for Agriculture, Food and the Marine provides authority under the Forestry Act 2014 to fell or otherwise remove a tree or trees and/or to thin a forest for silvicultural reasons. The developer should take note of the contents of Felling and Reforestation Policy document which provide a consolidated source of information on the legal and regulatory framework relating to tree felling; gov.ie - Tree Felling Licences (www.gov.ie) As this development is within forest lands, particular attention should be paid to deforestation, turbulence felling and the requirement to afforest alternative lands. It is important to note that when applying to a Local Authority, or An Coimisiún Pleanála, for planning permission where developments are: a) subject to an EIA procedure (including screening in the case of a sub-threshold development) and any resulting requirement to produce an EIAR; and/or b) subject to an Appropriate Assessment procedure (including screening) and any resulting requirement to a Natura Impact Statement (NIS); and c) the proposed development in its construction or operational phases, or any works ancillary thereto, would directly or indirectly involve the felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species, 1. that there is a requirement inter alia under the EIA Directive for an overall assessment of the effects of the project or the alteration thereof on the environment to be undertaken, including the direct and indirect environmental impact of the project; and 2. pursuant to Article 2(3) of the EIA Directive, the Department of Agriculture, Food and the Marine strongly recommends that, notwithstanding the fact that a parallel consent in the form of felling licence may also have to be applied for, any EIAR and/or NIS produced in connection with the application for planning permission to the Local Planning Authority or An

Consultee Name	Scoping Reply	Summary of Scoping Comment
		Coimisiún Pleanála, should include an assessment of the impact of and measures, as appropriate, to prevent, mitigate or compensate for any significant adverse effects direct or indirect identified on the environment arising from such felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species. 3. Please note that there must be absolute spatial consistency between the felling licence areas submitted to DAFM (second authority) and all related planning documents submitted to the first authority in respect of the felling area(s)
Geological Survey of Ireland	06.03.2024	Recommended to review data available on the GSI website. Records show that there are no unaudited CGSs in the vicinity of the proposed wind farm extension. The Groundwater Data Viewer indicates an aquifer classed as a 'Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones' underlies the wind farm development. The Groundwater Vulnerability map indicates the range of groundwater vulnerabilities within the area covered is variable. We would therefore recommend use of the Groundwater Viewer to identify areas of High to Extreme Vulnerability and 'Rock at or near surface' in your assessments, as any groundwater-surface water interactions that might occur would be greatest in these areas. The Landslide Susceptibility Viewer indicates areas of Moderately High to High Susceptibility within the vicinity of the wind farm area. Should development go ahead, the GIS would appreciate a copy of reports detailing any site investigations carried out.
Health Service Executive	20.03.2024	The following documents should be taken into consideration when preparing the Environmental Impact Assessment Report: • Guidelines on the information to be contained in EIS (2002), • Advice Notes on Current Practice in the preparation of EIS (2003), • Guidelines for Planning Authorities and An Coimisiún Pleanála on carrying out Environmental Impact Assessment Recommends that the following matters are included and assessed in the EIAR: (additional detail provided in response) • Public Consultation • Population and Human Health • Water (Hydrology and Hydrogeology) • Land and Soils • Air, Dust and Odour • Climate Change and Opportunity for Health Gain • Noise and Vibration • Waste Management

Consultee Name	Scoping Reply	Summary of Scoping Comment
		• Ancillary Facilities • Cumulative Impacts
Iarnród Éireann	22.08.2024	No comments
Inland Fisheries Ireland	No response	No response
Irish Aviation Authority	16.02.02024; 22.03.2024	16.02.2024- queried lighting on existing turbines. MKO reverted to this query on the 08.03.2024 confirming that lighting on T11 is as per previous IAA guidelines. 22.03.2024- formal response received from IAA requested new lighting around geographical perimeter of the site
Irish Peatland Conservation Council	No response	No response
Irish Red Grouse Conservation trust	No response	No response
Irish Raptor Study Group	No response	No response
Sport Ireland	No response	No response
Irish Wildlife Trust	21.02.2024	Low staff capacity - unable to comment
Kerry Airport	No response	No response
Office of Public Works	No response	No response
Southern Regional Assembly	16.02.2024	Acknowledgment of email only
Sustainable Energy Authority of Ireland	19.08.2024	Acknowledgement of email only
SW Local Authority Waters Programme	No response	No response
The Arts Council	No response	No response
The Heritage Council	No response	No response
Transport Infrastructure Ireland	01.03.2024	With respect to EIAR scoping issues, a series of recommendations were provided as general guidance for the preparation of an EIAR, which may affect the national road network. The developer/scheme promoter should have regard, inter alia, to the following: - Consultations should be had with the relevant Local Authority/National Roads Design Office with regard to the locations of existing and future national road schemes. - Potential significant impacts arising from the development and haul route on the national road network - The developer, in preparing EIAR, should have regard to TII Publications (formerly 'DMRB' and the 'Manual of Contract Documents for Road Works'). -The EIAR/EIS should consider the 'Environmental Noise Regulations 2006' (SI 140 of 2006) and, in particular, how the development will affect future action plans by the relevant competent authority. Noise barriers may need to be considered. - A Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site, with reference to impacts on the national road network and junctions of lower category roads with national roads. In relation to national roads, TII's TTA Guidelines' (2014) should be referred.

Consultee Name	Scoping Reply	Summary of Scoping Comment
		Attention is drawn to Section 2.2 of TII's TTA Guidelines, which addresses requirements for sub-threshold TTA. - The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required. - The EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network. - In relation to any proposed haul route, where abnormal 'weight' loads are proposed, separate structure approvals/permits and other licences may be required. The applicant/developer should also consult with all PPP Companies, MMaRC Contractors and road authorities over which the haul route traverses to ensure the network is safeguarded.
Uisce Éireann	07.03.2024	Generic recommendations, including: a) Drinking Water Source(s) b) Where backfilling of materials is proposed, a waste sampling strategy to ensure the material is inert is required. c) Mitigation measures with regards potential negative impacts on any water source(s) d) Any and all potential impacts on the nearby reservoir as public water supply water source(s) are assessed, including any impact on hydrogeology and any groundwater/ surface water interactions. e) Impacts of the development on the capacity of water services f) The applicant shall identify any upgrading of water services infrastructure that would be required to accommodate the proposed development. g) The management of surface water h) Any physical impact on Uisce Éireann assets i) Any potential impacts on the assimilative capacity of receiving waters in relation to Uisce Éireann discharge outfalls including changes in dispersion / circulation characterises. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified within the report. j) Mitigation measures in relation to any of the above ensuring a zero risk to any Uisce Éireann drinking water sources (Surface and Ground water)
Waterways Ireland	15.02.2024	Noted that the site is not in a zone of notification
Telecoms		
2RN (RTÉ Transmission Network DAC)	20.11.2023	If no change to existing wind farm then no interference is expected
Coimisiún na Meán (formerly Broadcasting Authority of Ireland)	30.11.2023	No awareness of issues from existing wind farms on existing FM networks. The turbines are not located close to any existing or planned FM transmission sites.
Cellnex	19.12.2023	One telecoms installation in the affected area - Meentinny CIG-00316. (Lat – 52.27887, Long - -9.09287) The links on the tower are owned by –

Consultee Name	Scoping Reply	Summary of Scoping Comment
		• Three Ireland – ComReg Reference – CK0176 • Vodafone – ComReg Reference – CK040 • Imagine – ComReg Reference – CK137 • Eir – ComReg Reference – CK_3202 • Tetra – ComReg Reference - 512
Dense air	No response	No response
Eircom Ltd	01.12.2023	No transmission links in the area and no risk to the network
Electricity Supply Board	20.05.2025	The development has been thoroughly reviewed and cleared.
Enet Telecommunications Networks Limited	20.11.2023	No links in the area
EOBO Ltd	No response	No response
FastCom Broadband Limited	No response	No response
Hibernian towers	11.01.2024	No objection
Imagine Networks Services	21.11.2023	No microwave links affected by the development
Irish Rail	21.11.2023	Not within the GSM-R exclusion zone.
Ivertec Ltd	20.11.2023	The development will not impact on the network
JFK Communications Ltd	11.12.2023	No links in the area
JS Whizzy Internet Limited	04.03.2024	No links in the area.
Lackabeha Services Ltd T/A Airwaves Internet	No response	No response
RTÉ/Saorview	20.11.2023	No links present
TETRA Ireland	No response	No response
Three Ireland (Hutchison) Ltd	20.11.2023	No effect on the transmission network.
Towercom	21.11.2023	No links in the area.
Viatel Ireland Ltd	No response	No response
Virgin media	20.11.2023	No impact on current wireless network
Vodafone Ireland Ltd	30.11.2023	No links in the area.
Western Broadband Network	20.11.2023	No infrastructure in the area.

2.11 Other Engagement

2.11.1 Community Engagement

In preparation for the public consultation, conducted by the Applicant, a Community Liaison Strategy (CLS) was developed by the Community Engagement Team. The CLS involved desk research on the local area including research on the 2022 Census figures and the County and Local Development Plans. This research was undertaken in order to gain an understanding of the local heritage, people and business environment. The CLS is based on the 'Code of Practice for Wind Energy Development in Ireland Guidelines for Community Engagement' and the Aarhus Convention.

A Community Liaison Officer (CLO) was appointed for the project in August 2023 to act as the main point of contact to the local community. The appointment of a dedicated CLO was crucial to ensure effective communication and foster trust between the Applicant and the local residents.

Public consultation for the project comprised of two rounds of engagement where the CLO and a member of the Community Liaison Team called to households in the local area. The intention of the visits to households was for the CLO and the Community Liaison Team to introduce themselves and the Applicant to the individuals locally, to establish a line of dialogue with local residents, informing them of the acquisition of the existing wind farm by the Applicant and outlining the details of the Proposed Lifetime Extension .

The first round of engagement was conducted in June 2024 and comprised of door-to-door engagement with residents living around the 1km radius of the Taurbeg Wind Farm. A dedicated project booklet and an introductory booklet to the Applicant were provided to residents during this round of consultation. A project-specific website (www.taurbegwindfarm.ie) was also established.

The second consultation round was conducted in May 2025 and consisted of further door-to-door engagement and a letter drop to residents living around the 1km radius of the Taurbeg Wind Farm. The intention of this round of consultation was to provide further details on the Proposed Lifetime Extension and the extension of the Proposed Lifetime Extension from 9 years to 10 years which was previously presented, informing residents of the upcoming planning application submission date, details on how to access the planning application documents online once submitted and to gain further feedback from the local community.

During the consultation with the local community contact details in the form of a contact phone number and email address for enquiries were distributed. A contact and feedback facility are also included on the project website.

The project website displays up to date information on the Proposed Lifetime Extension. While the initial aim of the project website is to provide context for the project, develop a greater understanding on the need for renewable energy development, provide project information and advice on the consultation approach, the Project Website will evolve with the project to provide a source of updated information as the project progresses.

Feedback from the consultation rounds were passed on to the Project Team. Where areas of concern or interest were expressed, every effort was made to not only provide accurate information but also to guide the individuals concerned towards sources of accurate information to assist them in the process of informing themselves. The main issues and queries that arose during the consultation with the local community included the Proposed Lifetime Extension and planning application, the Community Benefit Fund, the potential for noise impacts and battery storage (which does not form part of the proposal). Follow-up phone calls on topics were undertaken where required.

Over the course of engagement with the local community/individuals and community groups feedback was actively sought on the Community Benefit Fund. The Community Benefit Fund is currently €23,000 per year and will increase by 2% annually over the 10-year lifetime extension period which will amount to approximately €290,000. Community groups in the vicinity of the project were also contacted to inform them of the project acquisition by the Applicant, details of the Proposed Lifetime Extension and to make assurances that Community Benefit funding would be continued and increased where a grant of planning permission for the Proposed Lifetime Extension is secured.

Rockchapel village contains a national school, community centre and GAA club – all of which have benefited from the Taurbeg Wind Farm Community Benefit Fund over the last 20 years of operation. Over the 20-year period the fund has provided the following:

- Assisted in the creation of a creche/playground in Rockchapel village;
- Provided funding to the local GAA Club;
- Provided funding for maintenance and improvements to the Taur church;
- Assisted with renovation works at the old Glash school which became a community centre; and
- Provided funding for improvements to the Rockchapel National School and the Knocknaclarig National School.

The wind farm was also previously opened to a number of school groups from surrounding settlements and villages. This was part of commitments made in the original planning application for the wind farm.

The Applicant facilitated an initiative with Wind Energy Ireland on the 28th November 2024, where students from Rockchapel National School visited Taurbeg and were given a tour of the wind farm.

Following this, a representative from the applicants Operations Team also visited Rockchapel National School giving a presentation on wind energy and how it contributes to the local community. There was positive engagement from the school on both occasions. There was also very positive feedback from the class and teacher about the wind farms in the area, and how they contribute to local initiatives. The project will continue to be used to inform how best we can educate school children on the benefits of wind energy.

The approach to consultation with the community is to engage in an open, honest and transparent manner with the aim to not only provide clear and understandable information but also to gain feedback to understand the views of the local community. A Community Engagement Report is included in Appendix 2-2 of this EIAR.

2.11.2 Pre-Planning Engagement

Cork County Council

First Pre-Planning Meeting

A pre-application meeting request was issued to CCC in accordance with Section 247 of the Planning and Development Act 2000, as amended, in February 2024. The request provided detail as to the background of the development, the proposal under consideration and current policy context at European, national, regional and local levels.

A pre-application meeting was duly held on the 27th of March 2024 via MS Teams. Those in attendance were:

On behalf of Cork County Council:

- Bryan Riney - Senior Planner
- Louise Ahern - Senior Executive Planner
- Sharon Casey - Ecologist
- Ian McDermott – Ecologist

On behalf of Agent and Applicant

- Padraig Cregg - MKO
- Meabhann Crowe - MKO
- Eoin McCarthy – MKO
- Claire Walsh – Taurbeg Ltd (the prospective applicant)

A pre-application PowerPoint presentation was delivered by the project team. It was noted that the existing wind farm, comprising 11 no. wind turbines, became operational in March 2006. Planning Condition no. 7 of the grant of permission issued for the wind farm (Pl. Ref: 02/3608) states: *"The structures shall be removed at the expiration of a period of 20 years beginning on the date of commissioning of the development. Reason: In the interest of planning and the sustainable development of the area."* It was noted that the original application for the wind farm was made in 2003, prior to the designation of the Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle Special Protection Area in 2012 and as such naturally the development could not at that time have been assessed in light of the conservation objectives for the site. The site is now located in a 'Normally Discouraged' zoning area for wind development where Development Plan Objective ET 13-8 of the Cork County Development Plan 2022 applies.

The discussion centred largely around the ecological matters pertaining to the site. The Planning Authority highlighted that the Special Protection Area (SPA) is designated for the protection of the Bird Directive Annex I species Hen Harrier, whose population is in decline.

The Planning Authority noted that must be certain beyond all reasonable scientific doubt, the project will not give rise to adverse effects on the integrity of any EU site. The Authority noted that the Applicant may need to explore the route of derogation from compliance with the Habitats Directive (Article 6.4 derogation) to secure a planning consent for extension of life of the wind farm.

Second Pre-Planning Meeting

A second meeting was held with Cork County Council on the 10th of February 2025 to update the Authority on the progress of the application. The meeting was held virtually, via Microsoft Teams. The following were in attendance:

On behalf of Cork County Council:

- Bryan Riney - Senior Planner
- Louise Ahern - Senior Executive Planner
- Sharon Casey - Ecologist
- Ian McDermott – Ecologist

On behalf of Agent and Applicant

- Crystal Leiker – Taurbeg Ltd (prospective applicant)
- Padraig Cregg - MKO
- Meabhann Crowe - MKO
- Eoin McCarthy – MKO
- Natalia Stolarska - MKO

A pre-application PowerPoint presentation was delivered by the project team. It provided a recap on the proposal to extend the operational life of the wind farm, and provided more detail on the Proposed Offsetting Measures, to be the subject of a planning application to Kerry County Council.

The discussion centred largely around the ornithological considerations pertaining to the site. MKO noted the fact that the planning strategy would be based on reliance on the "Imperative Reasons of Overriding Public Interest" (IROPI[7]) mechanism of the Habitats Directive. The MKO team explained to CCC that Proposed Offsetting lands have been identified in County Kerry within the SPA, approximately 11km from the Site. The Proposed Offsetting lands identified are located within the SPA. For clarity, the Offsetting lands site identification process did not identify suitable and/or available lands of sufficient quantity within Co. Cork within the SPA.

The Authority queried the timing of the applications to Cork and Kerry County Council , their ability to adjudicate on the application, and the guidance contained within document the European Commission's *Assessment of plans and projects in relation to Natura 2000 sites – Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (2021/C 437/01)* with regards location of the Proposed Offsetting lands.

MKO agreed to review the points raised by the Authority and revert should any further queries arise. MKO also highlighted the benefits of both Kerry and Cork County Councils, as respective Planning Authorities, to liaise when both applications are with them for determination.

[7] *1 The Habitats Directive (and Irish legislation) does provide for very limited circumstances where, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless proceed for imperative reasons of overriding public interest (Article 6(4)). This is referred to as IROPI and remains rare in Ireland although it is more common in other member states.*

National Parks and Wildlife Service

First NPWS Meeting

A meeting between the Applicant, MKO and the NPWS took place on the 30th of April 2024 via MS Teams. Those in attendance were:

- Applicant – Claire Walsh (CW), Cathal Gallagher (CG)
- MKO - Eoin McCarthy (EM), Padraig Cregg (PC), Pat Roberts (PR)
- NPWS – Stefan Jones (SJ), Declan O'Donnell (DOD)

Short presentation with slide deck provided by MKO and The Applicant

- Introduction of Proposal the Applicant and Project Team
- Site Location
- Existing Taurbeg Wind Farm Design
- Planning Policy Context
- Site Constraints, Environmental Designations, Habitats
- Ornithological and Ecological Survey Scope
- Wind Farms in SPAs

A summary of the meeting is set out below:

- PC confirmed that one day of carcass searching being undertaken per month and data will be extrapolated. No finds to date. MKO to take account of 43 minute removal time, while noting that carcass removal time is site specific.
- PC confirmed that the most relevant guidance (SNH) for surveying of existing WFs (for repowering applications) requires a minimum of 12 months but we have committed to 18 months for the Taurbeg WF Lifetime Extension project given its location within an SPA
- NPWS confirmed that no national approach/strategy for lifetime extensions of wind farms within SPAs exists.
- DOD suggested that MKO/the Applicant should engage with the Birds Unit within the NPWS,
- With regards offsetting, PC referred to a number of projects that have Hen Harrier Management/Habitat Enhancement Plans which can select from a menu of options (e.g. farmland management, forestry management, forestry felling, restoration of peatland). Referenced HH Project. It was noted also that the wind farm industry is a relatively young industry and therefore, these measures are very new.
- It was acknowledged by NPWS that a lifetime extension project carries much lower environmental risk compared to a repowering application.
- The NPWS considered the project could constitute as an IROPI project.
- MKO sought an on-site meeting with NPWS.

Second NPWS Meeting

A meeting between the Applicant, MKO and the NPWS took place on the 29th of May 2025 via MS Teams. Those in attendance were:

- Applicant – Crystal Leiker (CL), Cathal Gallagher (CG)
- MKO – Eoin McCarthy (EM), Natalia Stolarska (NS), Padraig Cregg (PC), Pat Roberts (PR), Donnacha Woods (DW), Sean Creedon (SC)
- NPWS – Paul Scott (PS), Cliona O'Brien (CO), Malachy Corcoran (MC), Jarvis Good (JG), Stefan Jones (SJ)

A short presentation with slide deck provided by MKO and the Applicant included:

- An overview of the Proposal, the Applicant and the Project Team
- Site Location
- Existing Taurbeg Wind Farm Design
- Planning Policy Context
- Environmental Designation, Appropriate Assessment and IROPI
- Proposed Offsetting Measures

A summary of the meeting is set out below:

- EM confirmed that a planning application to KCC for the Proposed Offsetting Measures will be submitted concurrently with the planning application to CCC for the Proposed Lifetime Extension.
- PC stated that the Proposed Offsetting Measures will significantly enhance its value for Hen Harrier foraging.
- PC stated the Proposed Offsetting Measures are permanent and under the ownership and management of the Applicant. Monitoring and adaptive management are planned.
- PC stated that the Proposed Offsetting Lands were chosen based on availability and suitability, along with habitat quality and land ownership.
- The NPWS provided some useful feedback on the Proposed Offsetting Measures and advised on where improvements could be made to benefit Hen Harrier.
- The NPWS acknowledged that renewable energy developments fall under IROPI.

The Applicant and MKO expressed a strong desire for a collaborative process with the NPWS post-submission, PS of the NPWS agreed with this.

2.12 Cumulative Impact Assessment

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

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

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

2.12.1 Methodology for the Cumulative Assessment of Projects

The potential cumulative impact of the Proposed Project and combined with the potential impact of other projects has been carried out with the purpose of identifying what influence the Proposed Project will have on the surrounding environment when considered collectively with approved and existing projects, projects pending a decision from the planning authority and land-uses in the defined cumulative assessment study areas as set out in Table 2-7 below.

The cumulative impact assessment of projects has three principle aims:

- To establish the range and nature of existing and approved projects within the cumulative impact study area of the Proposed Project.
- To summarise the relevant projects which have a potential to create cumulative impacts.
- To identify the projects that hold the potential for cumulative interaction within the context of the Proposed Project and discard projects that will neither directly or indirectly contribute to cumulative impacts. (Note: this is carried out by individual experts with respect to their specialist area of expertise.)

Projects were identified through a search of relevant online planning registers and effects were considered following a review of associated EIARs.

2.12.2 Cumulative Study Area

Table 2-7 below details the cumulative assessment study areas, relative to the Proposed Project, which are considered in this EIAR. Following consultation with the EIAR team on each individual topic, the maximum geographical extent where there is potential for in combination effects/cumulative impact, and justification for this extent was established and is presented below. A long list of projects considered across all disciplines in their cumulative impact assessment is included in Appendix 2-3 of this EIAR.

Table 2-7: Cumulative Study Area and Justification

Individual Topic	Maximum Extent	Justification
Population & Human Health (including shadow flicker)	Population Study Area (Clonfert East Electoral Division) Shadow Flicker Study Area (10x RD buffer of the turbines RD from existing turbine locations = 824m) Consideration for the Population & Human Health cumulative extent is also given to Air Quality, Climate, Noise, and Landscape and Visual (i.e., Residential Visual Amenity) Cumulative study areas.	The Study Areas for Population and Human Health are identified in Section 5.2.1 in Chapter 5 as the Electoral Divisions within which the Project is located. For the assessment of cumulative shadow flicker, any other existing, permitted or proposed wind farms are considered where their 10x rotor diameter buffer zones overlap the Shadow Flicker Study Area of 824m (ten times the rotor diameter from existing turbines) for the Proposed Lifetime Extension.
Biodiversity	Terrestrial Habitat and Species – 1km of Site and Offsetting Lands	All projects within this 1km buffer of the Site and Proposed Offsetting Lands were considered when completing the cumulative assessment for terrestrial biodiversity. The geographical boundaries were chosen because of the common nature of the habitats recorded within the Site, which mostly comprises upland blanket bog, wet grassland, conifer plantations and heath habitats, and the Proposed Offsetting

Individual Topic	Maximum Extent	Justification
	Aquatic Habitats and Species - Hydrological catchment area	Lands, which mostly comprises managed agricultural grassland and commercial forestry. The cumulative hydrological study area for hydrology and hydrogeology has also been applied to flora and fauna due to potential hydrological connectivity across the catchment.
Birds	Wind farms within the Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA plus 5km radius.	The Proposed Lifetime Extension was considered in the context of other wind farms, existing and approved planning applications, in the Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA plus a 5km radius that could result in cumulative impacts on birds.
Biodiversity - Bats	10km from the existing Taurbeg Wind Farm turbines	A 10km buffer of the existing turbines is used as recommended for the desktop study and cumulative assessment by NatureScot Guidelines 2021 (Section 4).
Land, Soils and Geology	EIAR Site Boundary	There is no potential for significant cumulative effects in-combination with other local developments on the land, soils and geology environment outside of the EIAR site boundary.
Hydrology & Hydrogeology	Hydrological catchment area	A cumulative hydrological study area has been delineated as follows: › The north of the site is located in the Tralee Bay Feale Catchment. A quantitative analysis using flow volumes derived from the EPA Hydrotool database shows that there is no potential for effects on the Feale River

Individual Topic	Maximum Extent	Justification
		downstream of EPA Hydrotool Node: 23_1771 (Total Upstream Catchment Area of ~95km2). › The south of the site is located in the Blackwater (Munster) Catchment. A quantitative analysis using flow volumes derived from the EPA Hydrotool database shows that there is no potential for effects downstream of EPA Hydrotool Node: 18_2469 on the Glenlara River. This Node is located ~2km upstream of the confluence of the Glenlara and Allow Rivers. In order to be conservative and for completeness, the cumulative study area extends downstream as far as Node 18_1756 which includes the entire catchment of the Glenlara River (Total Upstream Catchment Area of ~139km2). Based on the above the delineated hydrological cumulative study area is ~234km2.
Air Quality	Air Quality Study Area is 1km from existing Taurbeg Wind Farm turbines	Given dust particles do not generally travel greater than 500m from source (Guidance on the Assessment of Mineral Dust Impacts for Planning, IAQM 2024) the geographical boundary for the cumulative dust impact is 500m. In line with the TII Publication Air Quality Assessment of Proposed National Roads – Standard PE-ENV-01107, December 2022, a geographical boundary of 1km was used for cumulative air quality assessment.

Individual Topic	Maximum Extent	Justification
Climate	The Climate assessment has been considered on a national basis and not confined to a specific study area.	The Climate assessment has considered the cumulative effects of the Proposed Project with other developments on a national basis under the relevant national Sectoral Emissions Ceilings.
Noise and Vibration	The list of wind farms which were initially considered in cumulative assessment extended to 20 km	Due to the potential for cumulative effects with other existing wind farm developments, the study area for the Proposed Lifetime Extension covers at a minimum the area predicted to exceed 30 dB L_{A90} at the maximum predicted noise emission level for the Taurbeg Turbines isolation (Institute of Acoustics document Good Practice Guide To The Application Of Etsu-R-97 For The Assessment And Rating Of Wind Turbine Noise).
Archaeological, Architectural and Cultural Heritage	2km from existing Taurbeg Wind Farm turbines	Cumulative impacts on setting are more likely to occur at the operational stage of the development (i.e. post construction). In this regard in order to assess overall cumulative effects on archaeology and cultural heritage, the Proposed Lifetime Extension is considered in the context of other developments, in particular other permitted and proposed wind farms within 2km of the Proposed Lifetime Extension.
Landscape & Visual	20km from the existing Taurbeg Wind Farm turbines for visual and landscape effects. 15km from the existing Taurbeg Wind Farm turbines for effects on landscape character	The Wind Energy Development Guidelines (DoEHLG, 2006) ('the Guidelines') require that "in areas where landscapes of national or international renown are located within 25 km of a proposed wind energy development, the Zone of Theoretical Visibility should be extended as far (and in the direction of) that landscape".

Individual Topic	Maximum Extent	Justification
		There are no landscapes of national or international renown within 25km of the Proposed Lifetime Extension, and therefore the cumulative boundary for visual and landscape effects is reduced to 20km from the Proposed Lifetime Extension. This LVIA Study Area of 20km for landscape and visual effects as is suggested by guidance: "For blade tips in excess of 100m, a Zone of Theoretical Visibility radius of 20km would be adequate" (WEDGs Page 94, DoEHLG, 2006; Page 152, DoHPLG, 2019). The Landscape Character Areas (LCA) study area has been chosen as 15 kilometres for effects on landscape character. Through experience conducting LVIA for other wind energy development projects, the assessment team determined that no significant effects on landscape character are likely to arise beyond distances of 15km from the existing turbines. Therefore, a LCA Study Area of 15km is deemed appropriate for effects on landscape character in relation to the assessment of effects upon designated Landscape Character Areas
Material Assets: Traffic & Transport	1km from the EIAR Site Boundary	Given the nature of the Project (i.e. no construction or groundworks proposed), it was determined that this buffer was suitable for the cumulative assessment.
Material Assets: Telecoms, Aviation and Other Utilities	20km for Telecoms and Aviation.	The geographical boundary for the telecoms cumulative assessment is defined by the

Individual Topic	Maximum Extent	Justification
	EIAR Site Boundary for other utilities.	potential for other wind farm projects to interfere with broadcast signals that interact with the Proposed Lifetime Extension.

2.12.2.1 Other Developments/Land Uses

The review of the relevant County Council planning registers documented relevant general development planning applications in the vicinity of the Proposed Lifetime Extension, the majority of which relate to the provision and/or alteration of one-off rural housing and the provision of agricultural buildings. These applications and land uses have also been taken account in describing the baseline environment and in the relevant assessments.

Furthermore, the cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider all potential significant cumulative effects arising from all land uses in the vicinity of the Proposed Project. These include permitted and existing wind farms in the area, solar farms, ongoing agricultural practices/forestry practices, quarries and extractive industries, intensive production/ processing industries, large infrastructure projects and other EIAR projects. The OPW (www.floodinfo.ie) does not record the presence of any Arterial Drainage Schemes or Benefited Lands within the Site.

Overall, the mitigation measures set out in this EIAR will ensure that significant cumulative effects do not arise during the extended operational or decommissioning phases of the Proposed Project. Additional detail in relation to the potential significant cumulative effects arising and, where appropriate, the specific suite of relevant mitigation measures proposed are set out within each of the relevant chapters of this EIAR.

2.12.2.2 Summary

The cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider all potential significant cumulative effects arising from relevant projects and land uses within the cumulative study area. These include ongoing agricultural and forestry practices.

Overall, the suite of mitigation measures is set out within the EIAR. Additional detail in relation to the potential significant cumulative effects arising and, where appropriate, the specific suite of relevant mitigation measures proposed are set out within each of the relevant chapters of this EIAR.

APPENDIX 1

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APPENDIX 2

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