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Illaunbaun Wind Farm - Environmental Impact Assessment Report

Chapter 3: Need for the Proposed Development



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ACRONYMS

ACP	An Coimisiún Pleanála
CAP	Climate Action Plan
CDP	County Development Plan
EPA	Environmental Protection Agency
ESEG	Energy Security Emergency Group
EU	European Union
GHG	Greenhouse Gases
GW	Gigawatt
LECP	Local Economic and Community Plan
MW	Megawatt
NDP	National Development Plan
NESF	National Energy Security Framework
NPF	National Planning Framework
NPO	National Policy Objectives
NSO	National Strategic Outcome
RPO	Regional Policy Objective
RSES	Regional Spatial and Economic Strategy
SEAI	Sustainable Energy Authority of Ireland
RESS	Renewable Electricity Support Scheme
WES	Wind Energy Strategy

3 NEED FOR THE PROPOSED DEVELOPMENT

The Illaunbaun Wind Farm, including the Slievenalicka Wind Turbine (jointly referred to as the Proposed Development) is proposed in response to pressing international, European, national and regional policy on climate change and targets for reduction in carbon emissions. The Proposed Development represents a timely and strategic contribution to these objectives and is consistent with planning, climate, and energy policy at national, regional, and local levels.

This section outlines the rationale for the Proposed Development in the context of Ireland's legal obligations on greenhouse gas (GHG) emissions reduction, renewable energy deployment, energy security, and spatial planning. While the legislative and policy framework underpinning the Proposed Development is set out in detail in Chapter 2: Policy and Legislation, this section summarises the main legislative and policy drivers underpinning the need for the Proposed Development

3.1 LEGISLATIVE AND POLICY CONTEXT

3.1.1 CLIMATE LEGISLATION AND EMISSIONS TARGETS

As set out in the Climate Action and Low Carbon Development (Amendment) Act 2021, Ireland is legally committed to reducing its GHG emissions by 51% by 2030, compared to 2018 levels, and to achieving the transition to a climate neutral, climate resilient, biodiversity-rich, and environmentally sustainable economy by no later than 2050. These obligations are supported by the legally binding carbon budgets and sectoral emissions ceilings introduced in 2022, which are being implemented through successive Climate Action Plans (CAPs).

Under Section 15 of the Climate Action and Low Carbon Development (Amendment) Act 2015 all public bodies, including planning authorities and An Coimisiún Pleanála (ACP), are required to perform their functions in a manner consistent with:

- Ireland's national climate objective of achieving a climate-neutral economy by 2050, and
- The achievement of sectoral emissions ceilings and carbon budgets.

The implications of the obligations placed on planning authorities under Section 15 were recently the subject of a High Court Judgment, *Coolglass Wind Farm Limited v An Bord Pleanála* [2025] IEHC 1, where the developer challenged the decision of ACP to refuse permission to Coolglass Wind Farm on the basis that it represented an identified material contravention of the County Development Plan. Mr Justice Humphreys ultimately overturned ACP's decision and held that section 15 of the Climate Act obliges ACP to exercise its evaluative judgement and discretion under section 37G of the Planning and Development Act, 2000 (as amended) in a manner that supports our climate objectives and specifically the CAP.

Delivering judgement in the case, Mr Justice Humphreys undertook a detailed consideration of the interpretation of section 15 of the Climate Act and concluded that, when determining a planning application relevant to the achievement of climate plans and objectives under S.15 of the 2015 Act, a planning authority is required to:

- (i) Consider if granting permission would contribute to achieving our climate goals, and the Court concluded that in the case of renewable energy projects the answer is invariably yes.
- (ii) Where the answer to the first question is yes, consider whether granting permission is precluded by a "mandatory and non-flexible legal requirement that confers no discretion or evaluative judgment on the [Commission]"
- (iii) "If the answer to that is No, the [Commission] should then ask if its discretion or evaluative judgment can be exercised in such a way as to support the outcome favouring climate goals."

ACP and the State challenged this verdict to the Supreme court, where Mr Justice Humphreys' decision was upheld, on narrower grounds.

The case highlights the imperative nature of the obligation placed on public bodies to exercise their discretionary powers in "such a way as to support the outcome favouring climate goals", and shows the importance placed on CAP targets and the obligation for planning authorities to consider them in their decision-making.

The CAP24, published in December 2023, reiterates the 51% GHG emissions reduction target and identifies a need for accelerated deployment of renewable electricity infrastructure, including achieving an installed onshore wind capacity of 6 GW by 2025 and 9 GW by 2030. Preliminary financial analysis in the CAP24 suggests that achieving the 2030 emissions reduction targets will likely require approximately €120 billion in investment across all sectors of the economy.

The CAP25 was approved in April 2025, as the fifth iteration of the CAP, and the third prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021. It aligns with the legally binding economy-wide Carbon Budgets and Sectoral Emissions Ceilings. The plan notes that the greatest emissions reduction in Ireland has been seen in the energy sector, through onshore wind and solar, with electricity emissions down 26.2% from 2018 to 2023. The sector is also noted as having the most ambitious emissions reduction targets. The plan reaffirms the target of 9GW onshore wind by 2030 and highlights the importance of reaching this target.

Despite these commitments, Ireland remains significantly off-track to meeting its 2030 climate targets. In May 2024, the Environmental Protection Agency (EPA) published *Ireland's Greenhouse Gas Emissions Projections 2023-2050*, providing updated estimates of emissions trends to 2050. While the projections extend to 2050, the report's primary focus is on the 2023-2030 period due to the urgency of meeting the current national and EU 2030 targets.

The EPA's key findings include:

- "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."
- "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."

- “Faster implementation of measures is necessary to meet both National and EU targets. The pace at which planned policies and measures are implemented needs to be accelerated.”
- “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.”

These projections reinforce the critical importance of accelerating the delivery of renewable energy infrastructure, including onshore wind farms such as the Proposed Development, as a key mechanism to help close the implementation gap and meet Ireland’s binding 2030 targets.

3.1.2 RENEWABLE ELECTRICITY TARGETS

The CAP25 sets out Ireland’s target to achieve a renewable electricity share of 50% by 2025 and 80% by 2030. In addition, the Plan also sets out the target to achieving an installed onshore wind capacity of 6 GW by 2025 and 9 GW by 2030.

The national targets align with Ireland’s obligations under EU and international frameworks, including the Paris Agreement (2015), the EU Renewable Energy Directive (2018/2001/EU) and the European Green Deal (2020).

3.1.3 PROJECT IRELAND 2040

3.1.3.1 THE NATIONAL PLANNING FRAMEWORK

The National Planning Framework is Ireland’s high level strategic plan for shaping the country’s future growth and development to the year 2040. First published in 2018 by the Government of Ireland as part of Project Ireland 2040, it was revised in April 2025 to reflect updated climate, infrastructure, and regional development priorities (Government of Ireland, 2025).

The revised NPF is underpinned by ten National Strategic Outcomes (NSOs) which the framework aims to deliver. The most relevant NSOs to the Proposed Development are the following:

- **NSO 3:** Strengthened Rural Economies and Communities;
- **NSO 6:** A Strong Economy Supported by Enterprise, Innovation and Skills;
- **NSO 8:** Transition to a Carbon Neutral and Climate Resilient Society.

Section 9.2 of the NPF, titled *Resource Efficiency and Transition to a Neutral Carbon Economy*, highlights the central role of spatial planning in supporting Ireland’s legally binding transition to a climate-neutral economy by 2050. It emphasises that the planning system must facilitate decarbonisation by shaping land use, infrastructure investment, and development decisions that reduce greenhouse gas emissions and build resilience to climate risks. In particular, it notes that planning must enable a shift away from fossil fuels and support widespread deployment of renewable energy sources such as onshore and offshore wind, solar PV, and emerging technologies.

The NPF also recognises Ireland's ongoing dependence on imported fossil fuels and the vulnerabilities associated with geopolitical shocks and infrastructure constraints. It calls for spatial policies that strengthen energy security through increased use of indigenous renewables and support for grid infrastructure upgrades. The framework also acknowledges the spatial implications of renewable energy development in rural areas, stating that rural landscapes will continue to play a vital role in hosting renewable electricity infrastructure, provided it is appropriately sited and balances environmental, landscape, and community considerations. It encourages Local Authorities and Regional Assemblies to integrate energy planning within development plans and to deliver the renewable energy capacity allocations set out in National Policy Objectives (NPOs) 74 and 75.

The various policies in the NPF are structured under NPOs. They were developed as a result of extensive analysis and consultation and set a way forward for regional and local planning and sustainable development policy in Ireland. The following NPOs from the 2025 revised framework are particularly relevant to the Proposed Development (Table 3-1):

Table 3-1: National Planning Framework – First Revision NPOs relevant to the Proposed Development

National Policy Objective	Description	Relevance
NPO 69	Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for GHG emissions reductions as expressed in the most recently adopted carbon budgets.	The Proposed Development contributes directly to Ireland's 2030 and 2050 climate goals.
NPO 70	Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a carbon neutral economy by 2050.	The Proposed Development supports renewable energy generation in County Clare.
NPO 71	Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development.	The Proposed Development will contribute to renewable electricity generation and necessitate grid connection infrastructure, aligning with national objectives to modernise and reinforce Ireland's electricity grid.

National Policy Objective	Description	Relevance
NPO 74	Each Regional Assembly must plan, through their Regional Spatial and Economic Strategy (RSES), for the delivery of the regional renewable electricity capacity allocations indicated for onshore wind and solar reflected in Table 9.1 (of the NPF), and identify allocations for each of the local authorities, based on the best available scientific evidence and in accordance with legislative requirements, in order to meet the overall national target	The Proposed Development contributes directly to the Southern Region's onshore wind allocation under Table 9.1 of the NPF (978 MW) and supports delivery of County Clare's share of national renewable electricity targets

3.1.3.2 THE NATIONAL DEVELOPMENT PLAN

As a core part of Project Ireland 2040, the National Development Plan (NDP) 2021-2030, originally published in October 2021, in tandem with the NPF, set out the Government's over-arching investment strategy and budget for the decade. With a total planned public investment of €165 billion, the original NDP was an ambitious plan that balanced the significant demand for public investment across all sectors and regions of Ireland with a major focus on improving the delivery of infrastructure projects to ensure speed of delivery and value for money.

In July 2025, the Government published a comprehensive review of the NDP, extending the capital investment horizon out to 2035 and significantly increasing both the scale and duration of planned public investment. The National Development Plan Review 2025 (Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation, 2025) presents the largest-ever capital investment plan in the history of the State. It outlines a total public investment envelope of €275.4 billion for the period 2026–2035, which includes €102.4 billion in departmental capital allocations for 2026–2030, alongside a further €100 billion anticipated for the 2030–2035 period. Funding sources include both Exchequer and non-Exchequer streams, such as the Infrastructure, Climate and Nature Fund (ICNF), windfall receipts, and targeted equity injections for strategic infrastructure.

The NDP Review 2025 emphasises targeted capital investment, infrastructure delivery reform, and balanced regional development as key drivers of Ireland's long-term growth and climate objectives. The Proposed Development will directly contribute to these objectives by increasing the share of renewable electricity generation in a rural area, directly benefiting from and contributing to the effectiveness of planned grid investment and regional infrastructure funding.

3.2 ENERGY SECURITY AND RESILIENCE

Ensuring a secure and reliable energy supply is crucial for maintaining the well-being and economic stability in Ireland. According to the Sustainable Energy Authority of Ireland (SEAI) *Energy in Ireland Report 2025* (SEAI, 2025), in 2024, 13.9% of Ireland's gross electricity supply was sourced through net-imports from Northern Ireland and Great Britain, with 45.3% of the electricity supply coming from fossil fuels during the same period.

In response to the energy security challenges exacerbated by the war in Ukraine, the Irish Government published the National Energy Security Framework (NESF) in April 2022. This document provides an overarching and comprehensive strategy to address Ireland's immediate and long-term energy security needs, focusing on:

- Managing the impact on consumers and businesses, with particular attention to vulnerable groups;
- Ensuring the security of energy supply in the near term;
- Reducing dependency on imported fossil fuels by accelerating the transition to indigenous renewable energy sources

The NESF also established the Energy Security Emergency Group (ESEG) to coordinate national-level activities and responses related to energy security, ensuring that Ireland is prepared to deal with potential shocks to its energy system.

The Proposed Development will support Ireland's energy independence by contributing to indigenous, zero-carbon electricity supply that can be integrated into the national grid infrastructure.

3.3 REGIONAL AND LOCAL NEED

Clare County is part of the Southern Region and is well positioned to contribute to national targets. The Proposed Development aligns with a wide range of regional and local plans that support renewable energy development, climate action, and sustainable rural economic development, infrastructure resilience, and job creation, in line with NPO 24 and NPO 30 of the NPF, which promote sustainable rural economies and diversification through low-carbon sectors. The Proposed Development will also directly contribute to objectives set out in the Southern Regional Spatial and Economic Strategy (RSES) 2020, the Clare County Development Plan 2023–2029, and the Clare Local Economic and Community Plan (LECP) 2024–2030.

3.3.1 SOUTHERN REGIONAL SPATIAL & ECONOMIC STRATEGY (RSES, 2020)

The Southern Regional Spatial and Economic Strategy (RSES), which came into effect in January 2020, sets out a long-term planning and economic framework for the Southern Region in line with the National Planning Framework (NPF). The strategy identifies key regional policy objectives (RPOs) to guide development and investment across the region, with a strong emphasis on sustainability, rural innovation, and the transition to a low-carbon economy.

The Proposed Development directly supports the RPO's of the RSES in several ways, namely:

- **RPO 40:** by contributing to regional economic resilience through investment in renewable energy and diversification of the energy sector.
- **RPO 46:** by enhancing rural physical infrastructure, including substation and grid connection upgrades in west Clare.
- **RPO 49:** by fostering rural innovation, job creation, and competitiveness in the low-carbon sector.
- **RPO 56:** by supporting the region's transition to a low-carbon economy through increased deployment of renewable energy.
- **RPO 96:** by facilitating the integration of renewable energy into the grid and upgrading regional energy infrastructure.
- **RPO 99:** by enabling the sustainable development of onshore wind energy at an appropriate and assessed location.

3.3.2 CLARE COUNTY DEVELOPMENT PLAN 2023-2029

The Clare County Development Plan (CDP) was formally adopted in April 2023. The CDP sets out an overall strategy for the proper planning and sustainable development of the functional area of Clare County Council over a 6-year period, with the goal of developing County Clare in a dynamic, resilient, internationally competitive location for innovation and investment whilst also developing County Clare in a sustainable manner. The CDP informs Local Area Plans and local energy policy.

The CDP identifies renewable energy as a central pillar of the county's transition to a low-carbon and climate-resilient economy. The Proposed Development directly supports the following CDP goals:

- **Goal II:** "A county that drives local and regional sustainable growth by harnessing the potential of its unique location, quality of life, natural resources and other competitive advantages."

The Proposed Development will harness the wind energy of the county, making use of the county's natural resources in a sustainable manner, whilst also facilitating economic development, and improving County Clare's security of energy supply.

- **Goal X:** "A county that supports strong economic growth and a high quality of life for all residents through the provision of efficient and robust physical infrastructure whilst having regard to environmental responsibilities and complying with European and national legislation."

The Proposed Development is an example of a major investment in the county's renewable energy and will bring efficient and robust physical infrastructure whilst having regard to environmental responsibilities and complying with European and national legislation.

The Clare CDP includes a target of 550 MW of installed onshore wind capacity for the county. The Proposed Development will contribute to achieving this target and is consistent with the Renewable Energy and Wind Energy Strategies set out in Volumes 5 and 6 of the Plan. *Objective CDP 11.47* specifically supports onshore wind development in appropriate locations and promotes community engagement in energy projects. *Objective CDP 2.14* supports the transition to a low-carbon economy through uptake of green technologies and reduced GHG emissions.

3.3.3 CLARE LOCAL ECONOMIC AND COMMUNITY PLAN 2024-2030

The Clare LECP 2024–2030 outlines strategic actions to promote inclusive, sustainable economic growth. The Proposed Development supports *High-Level Goal 5: Position Clare as a leader in renewable energy*. Under this goal, the LECP commits to:

- Developing Clare’s capacity to contribute to Ireland’s renewable energy targets
- Enabling low-carbon infrastructure in rural areas
- Supporting communities and businesses to benefit from renewable energy projects

The Proposed Development also aligns with broader LECP goals related to climate action, job creation, rural revitalisation, and resilience in the face of energy and environmental pressures.

3.4 CONCLUSION

The Proposed Development is justified by a clear and compelling national, regional, and local need. It supports legally binding climate action, renewable electricity generation, and energy security targets and objectives. It aligns with Project Ireland 2040, spatial planning and infrastructure policy, and contributes to Ireland’s commitments under both national legislation and EU directives.

The Proposed Development forms part of a needed and timely transition to a sustainable and climate-resilient energy system.

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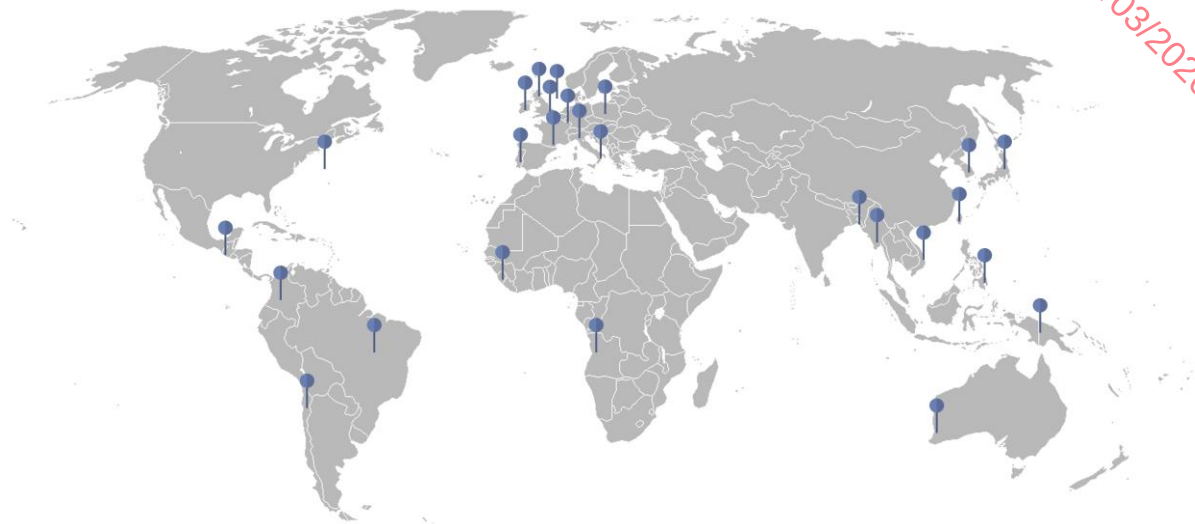
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