



**PLANNING
REPORT
ADDENDUM**

Laurclavagh Wind Farm

Response to Further Information - Planning Report Addendum





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1. INTRODUCTION

1.1 Purpose of the Planning Report Addendum

In response to the Further Information Request made by An Coimisiún Pleanála (the Commission), in order to enable a decision on the Proposed Wind Farm, consisting of 8 no. wind turbines (ACP Ref: 319307), MKO have prepared this Planning Report Addendum (the Addendum) on behalf of the Applicant, Laurclavagh Ltd. The Addendum sets out updates to the previously submitted Planning Report. In the preparation of this Addendum, the following factors have been considered:

- An Coimisiún Pleanála's Further Information Request
- The submissions on the Proposed Wind Farm application files (ABP-319307-07)
- Updates to the baseline environment;
- Updates to surveys and assessments;
- Updates to regulations, policy and guidance.

It is not intended that the Addendum replaces the submitted Planning Report, rather the Addendum is read in conjunction with the submitted Planning Report. This Addendum should be read as part of the Response to Further Information (RFI).

This Addendum presents any updates or changes to the previously submitted Planning Report, as a result of the RFI. For Chapters or Sections where no updates or changes are necessary, this is outlined within the relevant section of the Addendum.

1.2 Structure of the Addendum

The Addendum follows the same structure as the previously submitted Planning Report to cover changes or updates to the following:

Section 1: Preamble and the structure of the Addendum.

Section 2: Outlines the background of the project, provides an update in relation to the planning history, project design and pre-planning consultations.

Section 3: Provides an update on the relevant policy developments since the application was lodged.

Section 4: Provides an update on the wind energy capacity assessment and County Galway's ability to meet targets set out in the Local Authority Renewable Energy Strategy (LARES).

2.

PROJECT BACKGROUND

Laurclavagh Ltd. (the Applicant) of Lissarda Business Park, Lissarda, Co. Cork, applied to the Commission for planning permission to construct 8 no. wind turbines and associated infrastructure in the townland of Laurclavagh and adjacent townlands near Tuam, Co. Galway. This application was submitted on 15th March 2024 (ACP Pl. 319307). The application meets the threshold for wind energy set out in the Seventh Schedule of the Planning and Development Act 2000, as amended (the Act), on foot of a notice issued by the Commission and was therefore submitted directly to the Commission as a Strategic Infrastructure Development (SID) in accordance with Section 37E of the Act.

The following documents were submitted as part of the initial submission to the Commission:

- Planning Application Documentation
 - Planning Application Form;
 - Letters of consent from relevant landowners - appended to this cover letter;
 - Copies of cover letters issued to Prescribed Bodies;
 - Site Notice (copy, as erected on site on the 15th March 2024);
 - Newspaper Notices - Local Publication: The Connacht Tribune, and National Publication: The Irish Independent (both publications dated 15th March 2024);
 - EIA Portal Confirmation (ID: 2024045).
- Planning Report;
- Planning Application Drawings (Drawing Schedule included with the planning application form);
- Red Line Boundary in CAD and shapefile format;
- Environmental Impact Assessment Report (EIAR);
 - Volume 1 - Non-Technical Summary (NTS) and Main Report
 - Volume 2 - Photomontage Booklet
 - Volume 3 - EIAR Appendices including confidential Appendices.
- Natura Impact Statement (NIS).

On 5th March 2025, the Commission issued a request for Further Information for the Laurclavagh Renewable Energy Development.

The Proposed Wind Farm comprises the construction of 8 No. wind turbines and all associated works. The applicant is seeking a 10-year planning permission and a 30-year operational life. The full description of the Proposed Wind Farm, as per the public planning notices, is as follows (and remains unchanged from the previously submitted Planning Report):

“The proposed development will consist of the provision of the following:

- i. 8 no. wind turbines with an overall turbine tip height of 185 metres; a rotor blade diameter of 163 metres; and hub height of 103.5 metres, and associated foundations, hard-standing and assembly areas;*
- ii. A thirty-year operational life of the wind farm from the date of full commissioning of the wind farm and subsequent decommissioning;*
- iii. Underground electrical cabling (33kV) and communications cabling;*
- iv. A temporary construction compound;*
- v. A temporary security cabin;*
- vi. A meteorological mast with a height of 30 metres and associated foundation and hard-standing area;*
- vii. A new gated site entrance on the L61461;*
- viii. Junction accommodation works and a new temporary access road off the N83 to the L61461, to facilitate turbine delivery and construction access to the site;*
- ix. Upgrade of existing site tracks/ roads and provision of new site access roads, junctions and hardstand areas.*
- x. Upgrade of the existing L61461;*
- xi. Spoil Management;*

- xii. *Site Drainage;*
- xiii. *Tree and hedgerow removal;*
- xiv. *Biodiversity Enhancement measures (including the planting of natural woodland, hedgerows and species rich grassland for new habitat);*
- xv. *Operational stage site signage; and*
- xvi. *All ancillary works and apparatus.*

A ten-year planning permission is sought."

2.1 Project Design Update

A minor amendment has been made to the red line boundary of the planning application. This adjustment excludes the land contained within Folio GY133807F. At the location of this folio, along the L61461, it is noted that the previously proposed road widening for this 35-metre section will not be carried out as part of the Proposed Wind Farm as this is conditioned as part of a separate and unrelated planning permission (Ref: 201188) and will not require widening. Accordingly, no further road widening works are necessary along this stretch of the L61461. The drainage design along the L61461 has been updated to reflect this amendment.

This amendment is detailed further in Appendix 2 – Addendum Planning Drawings, as part of the Response to Further Information.

2.2 Planning History Update

2.2.1 Planning applications within the application site boundary

In July 2025 an updated planning search was conducted using GCC's online planning portal, along with the Commission's online case search function to identify relevant planning applications within the designated red line boundary of the planning application site.

One new planning application was identified within the red line boundary of the Proposed Wind Farm. This application is PI Ref. 24/61217, the development description of which is as follows:

"to construct a dwelling house with a wastewater treatment plant, percolation area, and all associated site works. Gross floor space of proposed works: 292.00 sqm"

This application was submitted to Galway County Council on 13th September 2024. GCC issued a request for Further Information (FI) from GCC on 7th November 2024. The application was deemed withdrawn by GCC on 16th May 2025.

3.

PLANNING POLICY APPRAISAL

As outlined above in Section 1.1 Laurclavagh Ltd. applied to the Commission for planning permission to construct a renewable energy development to comprise of 8 no. wind turbines and associated infrastructure located approximately 9km southwest of Tuam, Co. Galway on 15th March 2024 (ACP Pl. Ref. 319307). Given that over a year has passed since the submission, MKO is providing an updated planning policy context summary in respect of the Proposed Wind Farm to reflect the current policy background and to account for changes or new additions.

3.1

International Policy Context

3.1.1

COP29 Baku

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.

3.1.2

Renewable Energy Directive

In November 2023, a revision of the Renewable Energy Directive¹ (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 at least 42.5%, with an ambition to reach 45% by 2030. The increase was proposed under the publication of 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.

Central to REDIII is the presumption that renewable energy development must be considered to be **in the overriding public interest** when addressing competing interests under the Habitats Directive (92/43/EEC), Birds Directive (2009/147/EEC) and the Water Framework Directive (2000/60/EC). The recognition of renewable energy projects being in the 'overriding public interest' was originally introduced under Article 3(1) of emergency Regulation 2022/2577 of 22nd December 2022 named 'laying down a framework to accelerate the deployment of renewable energy' as part of the REPowerEU plan.

Article 16f of RED III states:

¹ Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (recast)

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

There is an 18-month period to transpose most of the directive's provisions into national law ending on the 1st of July 2025, with a shorter deadline of July 2024 for some of the provisions related to permitting for renewables. In September 2024, the EU Commission opened infringement proceedings against Ireland for failures in relation to the transposition of permitting procedures. On the 17th of July 2025, the EU decided to send a 'reasoned opinion', a formal request to comply with EU law, giving Ireland two months to respond and take the necessary measures to complete the transposition.

Some provisions of RED III were transposed into national law via S.I No. 274/2025 - European Union (Planning and Development) (Renewable Energy) Regulations 2025 on the 6th August 2025. The provisions introduce mandatory timelines for decisions on renewable energy developments, as well as the presumption of renewable energy developments being of '*overriding public interest and serving public safety when balancing legal interests*', amongst other measures, aimed at speeding up the consenting process of renewable energy projects.

3.2

National Policy Context

3.2.1

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).

The Proposed Wind Farm 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.

3.2.2

Revised National Planning Framework (2025)

In April 2025, both houses of the Oireachtas approved the Government's Revised National Planning Framework (Revised 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.

There is an increased emphasis on the importance of the renewable energy development and infrastructure needed to support this. Chapter 9 acknowledges that the "*accelerated delivery of the additional renewable energy generation is... essential for Ireland to meet its climate targets.*" A number of new or amended National Policy Objectives (NPOs) have been proposed in order to achieve this objective.

The Revised NPF sets out regional renewable energy capacity allocations. The allocation for the Northern and Western Region, in which the Proposed Wind Farm is located, is 1,389MW. Under NPO 74, all Regional Assemblies will be required to plan how and where to deliver the required capacity by

identifying capacity allocations for each Local Authority in its area. Galway County Council will then be required to plan for the delivery of the energy capacity target that they have been allocated, under NPO 75.

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 itself with the national target of 9GW of onshore wind energy with the policies and objectives of Local Authorities.

The Proposed Wind Farm is in line with the objectives of the Revised NPF which seeks to transition to a low carbon and climate resilient economy. If permitted, the Proposed Wind Farm will contribute renewable energy, supporting NPOs.

3.3 Policy Conclusion and Project Compliance

The Proposed Wind Farm is fully consistent with international, EU, and national policy objectives for decarbonisation, renewable energy expansion, and energy security.

At the EU level, the latest revision of the Renewable Energy Directive (RED III) sets a target of at least 42.5% renewable energy across the EU by 2030. Ireland's updated National Energy and Climate Plan (NECP) 2021–2030, published in July 2024, commits to a 43% share of renewable energy in total energy consumption by 2030. However, the NECP notes that Ireland's current projected trajectory is not fully in line with the path set out in the Governance Regulation. By generating clean wind power, the Proposed Wind Farm will help close this gap, directly supporting Ireland's progress towards its EU obligations.

At the national level, the Climate Action Plan 2025 (CAP25) sets ambitious targets of 50% renewable electricity by 2025 and 80% by 2030, in line with legally binding carbon budgets and sectoral emissions ceilings. The Proposed Wind Farm will contribute directly to these goals by producing clean electricity, reducing reliance on imported fossil fuels, cutting greenhouse gas emissions, and improving energy security.

In terms of spatial planning policy, the Revised National Planning Framework 2025 (NPF) emphasises the need for an accelerated delivery of renewable energy and sets regional capacity targets to meet Ireland's overall goal of 9GW of onshore wind by 2030. Located within the Northern and Western Region, the Proposed Wind Farm will contribute to the region's 1,389MW capacity allocation and help Galway County Council meet its share. This directly supports National Policy Objectives for a low-carbon and climate-resilient economy.

Overall, the Proposed Wind Farm advances the aims of RED III, CAP25, and the Revised NPF by delivering new renewable generation capacity, strengthening energy security, and enabling progress toward climate neutrality.

3.4 Ireland's Climate and Renewable Energy Target Progress

Since the initial submission of the planning application in March 2024, Ireland has made progress towards its onshore wind energy targets, though the pace of delivery has not matched the levels required under national climate commitments. The National Energy Projections, published by the SEAI in November 2024, identifies that even with full implementation of CAP24, Ireland is projected to miss its national and EU 2030 targets for energy efficiency, renewable energy share and greenhouse gas emissions reduction.

Figure 1.27 of the Report, copied below, clearly illustrates the gap between the current installed wind capacity and the relevant Climate Action Plan (CAP) targets.

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

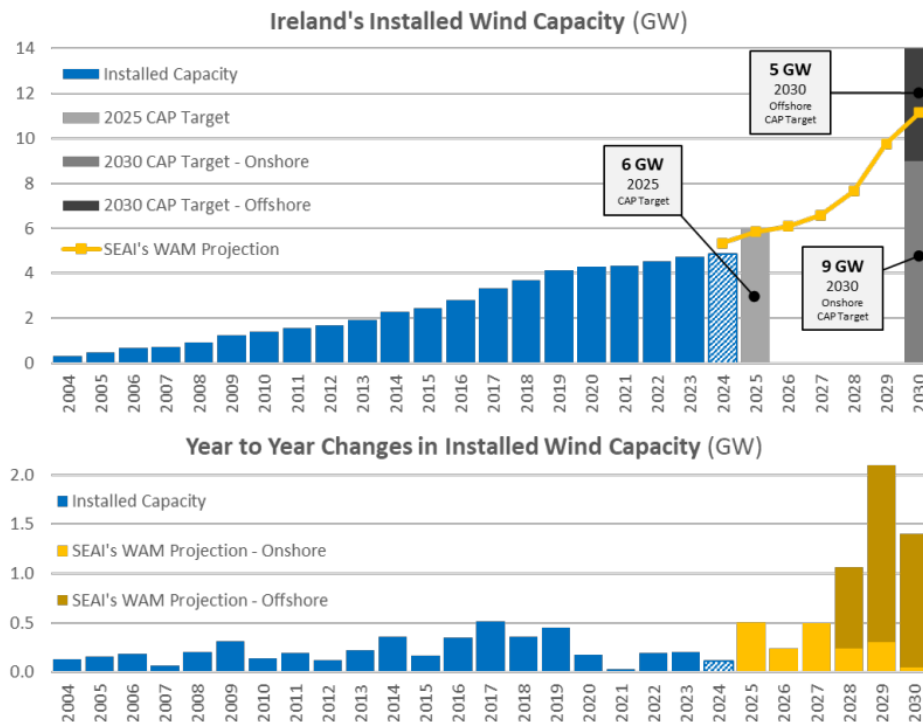


Figure 3-1: Ireland's installed wind capacity with 2024 estimates, projections to 2030, CAP targets

The National Energy Projections 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 ‘Energy in Ireland’ Report, published by the SEAI in December 2024, also emphasises the importance of wind energy generation to the decarbonisation:

“Increasing wind generation through added wind infrastructure is key to decarbonising Ireland's electricity supply. The decarbonisation of electricity maximised the positive impact of sustainability technologies like heat pumps and electric vehicles. The recent slow-down in added wind capacity is impacting Ireland's transition to a sustainable energy future. Renewable capacity must be added faster than electricity demand increases. We must do everything we can to support the roll-out of both onshore and offshore wind and grid-connected solar PV capacity”. (emphasis added)

The result of the slowing down of wind energy development is having a clear impact on the country's ability to reach climate and renewable energy targets, particularly due to the fact that the that many other sectors, such as transport and industry rely on the decarbonisation of the electricity sector. The Climate Change Advisory Council (CCAC) open their ‘Annual Review 2024-Summary for All’ 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 summary, recent reports on climate and energy in Ireland show that we are not acting fast enough. New renewable energy generators are not being consented, constructed and connected to the grid at

a fast enough rate to meet legally binding climate and renewable energy targets. The Proposed Wind Farm presents an opportunity to contribute to these critical targets.

3.4.1

Legal Obligations of An Coimisiún Pleanála

The Commission will be aware of certain legal obligations in respect of the processing of certain planning applications and appeals for renewable energy developments, in particular:

- Certain obligations under the Climate Action and Low Carbon Development Act 2015 (as amended) (the “Climate Act”) imposed on the Commission when exercising its decision-making functions in relation to planning applications for renewable energy developments.
- Certain discretionary powers under the Act which must be exercised subject to the mandatory obligations set out in the Climate Act when the Commission is exercising its decision-making functions in relation to planning applications for renewable energy developments.

Specifically, 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-

- *the most recent approved climate action plan,*
- *the most recent approved national long term climate action strategy,*
- *the most recent approved national adaptation framework and approved sectoral adaptation plans,*
- *the furtherance of the national climate objective, and*
- *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 above requirement is a mandatory obligation.

The National Climate Policies and Objectives listed in section 15, with which the Commission must comply, all support the development of onshore wind energy and associated grid infrastructure in accordance with proper planning and sustainable development.

The 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 S.15 of the 2015 Act, relevant bodies, in this case the Commission, is required to:

1. Consider which option available to it as the decision maker, grant or refuse permission, would contribute to achieving Ireland's climate targets and the wider objectives of section 15 - which Mr Justice Humphreys went on to conclude *"in the case of renewable energy projects, the answer the answer to that will almost always be a grant of permission"*.
2. Consider whether granting permission is *"precluded by a mandatory and non-fixable legal requirement"* that does not grant the decision maker any discretion or evaluative judgment 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 these policy goals.

In the specific case of the Proposed Wind Farm, it is a renewable energy development which has the potential to contribute to climate targets.

There are no mandatory and non-fixable legal requirements that prevent the Commission from reaching an outcome, in relation to the Proposed Wind Farm, that favours policy goals, i.e. granting permission. The Proposed Wind Farm is supported by local, regional and national policy and has been designed in accordance with national guidance and best practice. It has also been demonstrated, in the EIAR and NIS, that the Proposed Wind Farm will not give rise to any significant effect on the environment or have an adverse effect on the integrity of European Sites. With these matters considered, it is respectfully submitted that the Commission is obliged to exercise their evaluative judgement to reach an outcome favouring policy goals, in accordance with their obligation under S.15 of the Climate Act and grant permission.

On the 20th May 2025, the Supreme Court granted leave to the Commission to appeal the High Court's decision in the Coolglass case. The case recently concluded, and the appeal judgment will be due in the coming period. Until the appeal judgement is issued, the Coolglass judgment remains applicable to this application.

Ireland is also legally bound by renewable energy targets at a European level. The latest revision of the Renewable Energy Directive (RED III) introduced a binding EU-wide target for overall RES of at least 42.5% by 2030 and requires Member States to set their national contributions to the EU-wide target. In accordance with RED III and the revised RES target, the Department of the Environment, Climate and Communications (DECC) have published an updated National Energy and Climate Plan (NECP) 2021-2030 in July 2024. The updated NECP committed to achieving a 43% share of renewable energy in total energy consumption by 2030. In the trajectories set out in the updated NECP, it states that Ireland's proposed trajectory will not be in line with the desired trajectory set out in the Governance Regulation (Regulation 2018/1999). Meeting the legally binding target under REDIII is dependent on the rate of approval of renewable energy developments by Planning Authorities and An Coimisiún Pleanála.

4.

WIND ENERGY CAPACITY ASSESSMENT

Since the submission of the initial planning application, the unconstrained viable area for wind energy developments across county Galway has remained largely unchanged. It is evident that for County Galway to reach its potential wind energy capacity, wind energy development must be considered in areas outside of the 'Open to Consideration' and 'Accepted in Principle' wind energy zonings. As demonstrated in the Wind Energy Capacity Assessment, these areas can potentially deliver approximately 483.5MW, far below the LARES's estimated yield of 851MW of new wind energy by 2030. If County Galway is to reach its 851MW estimated new MW yield and its estimated 1,350MW total capacity yield target, suitable sites outside of the 'Open to Consideration' and 'Accepted in Principle' areas, such as the Proposed Wind Farm site, must be brought forward for wind energy development.

One wind energy development has been approved in County Galway, since the initial wind energy capacity assessment was undertaken, Knockranny wind farm (turbine alteration application) was approved in September 2024 and has increased Galway's built and permitted capacity by c. 15MW, bringing the total built and permitted capacity of County Galway up to approximately 465MW. Tullaghmore Wind Farm, which was in planning at the time of lodgement of the Proposed Wind Farm application, was refused permission in April 2024. Currently, there is approximately 136MW² in County Galway, including the Proposed Wind Farm, in the planning system awaiting a decision.

With less than 5 years to reach the 2030 estimated installed capacity of 1,350MW of wind energy within County Galway and 9GW installed nationally, it is imperative that wind energy projects are permitted as soon as possible in order for them to have a chance of being constructed and operational by 2030 to reach the above targets.

² Laurclavagh Wind Farm c. 56MW, Clonberne Wind Farm c. 80MW

5.

CONCLUSION

The development of renewable energy projects, such as the Proposed Wind Farm, remains strongly supported by European, national, regional, and local policies and guidelines focused on transitioning to a low-carbon, climate-resilient economy, increasing renewable energy output, and strengthening energy security. Since the original submission, global commitments under COP29, the strengthened requirements of the EU Renewable Energy Directive (RED III), the Climate Action Plan 2025, and the Revised National Planning Framework 2025 have all intensified the urgency to expand onshore wind generation. This development, located within the Northern and Western Region, will make a significant contribution to County Galway's 1,350 MW wind energy target and to Ireland's 9 GW national onshore wind target by 2030, directly supporting National Policy Objectives for a low-carbon, climate-resilient economy.

The High Court's judgment in *Coolglass Wind Farm Ltd v An Bord Pleanála* [2025] IEHC 1 confirms that, under Section 15 of the Climate Act, the Commission is obliged to favour outcomes that advance climate policy objectives unless precluded by unavoidable legal constraints - a threshold not met in this case. The Proposed Wind Farm is fully supported by regional and national policy, and the EIAR and NIS confirm it will not cause significant environmental effects or adversely affect European Sites. The transposition of RED III into national planning law also further strengthens support for renewable energy development within the planning legislative framework.

With less than five years remaining to 2030 and given the relatively static wind capacity growth in County Galway since the original capacity assessment, there is a clear need to approve wind energy developments if they are to be constructed, connected, and operational in time. The Proposed Wind Farm offers measurable and enduring benefits: enhancing energy security through indigenous generation and closing the gap between Ireland's projected renewable energy trajectory and its legally binding obligations.

Having regard to the key points set out in this Report, it is respectfully requested that the Commission consider the relevant planning context that applies, and grants permission for the Proposed Wind Farm which is the subject of this application