Environmental Impact Assessment Report (EIAR)

Cunlaghfadda Green Energy Project

Chapter 2 – Background to the Proposed Project

2. BACKGROUND TO THE PROPOSED PROJECT

2.1 Introduction

This Chapter of the EIAR presents an overview of the legislative and policy context for the Cunlaghfadda Green Energy Project, referred to as the 'Proposed Project', which is being brought forward in response to local, regional, national and European policy objectives and targets relating to Ireland's transition to a low-carbon economy, associated climate change policy objectives and the need to reduce Ireland's dependence on imported fossil fuels for the production of electricity. **Section 1.5 of Chapter 1** of this EIAR provides further information on the need for the Proposed Project.

This Chapter, together with the Planning Reports which accompany the planning applications, demonstrate how the Proposed Project is consistent with all relevant planning, renewable energy and climate change policies and targets at the local, regional, national and European level and with the proper planning and sustainable development of the Site.

This Chapter details the relevant planning history of the Site and identifies other wind energy developments within the wider area. This Chapter also summarises the EIAR scoping exercise, the pre-planning and community consultation undertaken and the cumulative impact assessment process.

The Proposed Project comprises the Proposed Wind Farm and the Proposed Grid Connection. Elements of the Proposed Wind Farm will be the subject of a planning application to Mayo County Council (MCC) under the Provisions of Section 34 of the Planning and Development Act 2000, as amended ('the Planning Act'). Elements of the Proposed Grid Connection will be the subject of a separate Strategic Infrastructure Development (SID) application for approval to An Coimisiún Pleanála (ACP) under the provisions of Section 182A of the Planning Act.

Both of the planning applications will be accompanied by this EIAR and a Natura Impact Statement (NIS).

As detailed in **Section 1.1.1** of **Chapter 1** of this EIAR the various project components are described and assessed using the following references: 'Proposed Project', 'Proposed Wind Farm', 'Proposed Grid Connection', and 'the Site'. A detailed description of the Proposed Project is provided in **Chapter 4** of this EIAR.

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 development.

This Chapter was led by Francesca Rowson with support from Mike Amiel Mekell and Shikha Gajula.

Francesca Rowson is a Senior Planner with MKO with over 12 years post-qualification experience as a town planning consultant. Francesca holds a Master's Degree (M.Plan) in Town and Regional Planning from the University of Sheffield and is a chartered member of the of the Royal Town Planning Institute. Francesca previously worked as a Planning Manager in KPMG Future Analytics in Ireland and prior to this, she worked for Stantec in the UK and Canada as a Principal Planner. Francesca's key areas of expertise lay in development management processes, formulation of planning and engagement strategies and project management including preparation and coordination of Environmental Impact Assessment Reports. Francesca has extensive experience of managing planning application and development consent processes for a wide range of infrastructure projects and residential, commercial and mixed-use development schemes on behalf of private and public sector organisations in Ireland and the UK. Within MKO, Francesca manages a portfolio of renewable energy and infrastructure

projects with responsibility for coordinating pre-planning, planning application and appeal submissions to ACP and Local Authorities.

Mike Amiel Mekell is a Planner with MKO having joined the company in June 2024. Mike holds a Bachelor of Arts (Hons) degree in Politics, International Relations and Sociology from University College Dubin and a Master of Science degree in Planning and Development from Queen's University Belfast. He is a Licentiate of the Royal Town Planning Institute. Prior to taking up his position with MKO, Mike worked as a Graduate Environmental Planner with Roughan and O'Donovan. In this role he prepared Environmental Impact Assessment Screening and Scoping reports, environmental monitoring and management reports and planning reports for projects involving public and active transport infrastructure and sustainable tourism development. 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.

Shikha Gajula is a Graduate Planner with MKO. Shikha holds a Bachelor's degree in Architecture (B.Arch) and a Master's degree in Planning and Development from the University of Galway. Prior to taking up her position with MKO, Shikha worked across multiple sectors. As a licensed architect, she contributed to design and documentation at Katerra Design Pvt Ltd, gaining experience in technical drawings, site analysis and barrier-free design. Since joining MKO, Shikha has been involved in a range of projects, including wind farm and grid infrastructure developments. She has also contributed to research examining wind farm repowering in Ireland for the Department of Climate, Energy and the Environment. Through her academic background and professional practice, Shikha has gained experience in renewable energy planning, Environmental Impact Assessment, strategic and spatial planning and public participation process.

2.1.2 Renewable Energy Resources

Renewable energy resources are constantly replenished through the cycles of nature, unlike fossil fuels, which are finite resources that are becoming increasingly scarce and expensive to extract. Renewable energy resources offer sustainable alternatives to our dependency on fossil fuels as well as a means of reducing greenhouse gas (GHG) emissions and opportunities to reduce our reliance on imported fuels.

There is an urgency to ensure that real changes occur without delay, which means that a gradual shift towards increasing Ireland's use of renewable energy is no longer viable. Renewable energy development is recognised as a vital component of Ireland's strategy to tackle the challenges of combating climate change and ensuring a secure supply of energy. Ireland is heavily dependent on the import of fossil fuels to meet its energy needs. In 2023, over 81% of Ireland's energy was imported from abroad, higher than the European Union (EU) average of almost 60% (National Energy Security Framework, 2022). 2024 saw a 55% increase in imported electricity relative to 2023[1]. This high dependency on energy imports is high risk, and Ireland is currently extremely vulnerable both in terms of meeting future energy needs and ensuring price stability. As such, expanding indigenous renewable energy supply is critical for energy security and price stability. The provision of the Proposed Project would aid in achieving the shift to decarbonising the electricity sector and improving energy security in Ireland.

2.1.3 Need for the Proposed Project

Section 1.5 of Chapter 1 of this EIAR the details the need for the Proposed Project which is being brought forward in response to policy objectives that support Ireland's transition to a low-carbon economy, require compliance with specific climate change targets and aim to reduce Ireland's dependence on imported fossil fuels for electricity production by developing indigenous renewable energy generation such as wind energy.

[1] *Environmental Protection Agency, 'Press release: Ireland's power generation and industrial greenhouse gas emissions down by seven per cent in 2024'. https://www.epa.ie/news-releases/news-releases-2025/irelands-power-generation-and-industrial-greenhousegas-emissions-down-by-seven-per-cent-in-2024--.php*

Ireland's Climate Action Plan 2025 sets ambitious yet essential targets for renewable energy, including 9GW of onshore wind capacity —with at least 6GW to be delivered by 2025— and an 80% share of renewable electricity by 2030[2]. However, multiple assessments, including the Climate Change Advisory Council (CCAC) Annual Review 2025[3] and the Environmental Protection Agency (EPA) emissions projections[4], confirm that Ireland is not on track to meet these targets. Significant gaps remain in renewable energy deployment, particularly in grid capacity expansion, as well as onshore and offshore wind energy development, while continued reliance on fossil fuels threatens national and EU climate commitments.

Failure to meet binding EU targets will expose Ireland to financial penalties, increased carbon credit costs, and continued dependence on fossil fuel imports—posing serious risks to energy security and economic stability. Furthermore, Ireland's national interest requires the rapid expansion of renewable energy, making this a matter of strategic economic and social importance.

Every viable renewable energy project plays a crucial role in meeting Ireland's climate targets. The approval of well-planned, appropriately located renewable energy projects, such as the Proposed Project is not just beneficial—it is imperative. Without decisive action to facilitate renewable energy deployment, Ireland risks missing national and EU commitments, incurring financial penalties, and undermining energy security. Please see the accompanying Planning Reports and **Section 1.5** of **Chapter 1** of this EIAR for further information on the need for the Proposed Project.

2.2 Climate Change Policy and Targets

International and national policy consistently identifies the need to reduce 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[5] 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 course of the 21st century.

The Synthesis Report[6] of the IPCC Sixth Assessment Report published in March 2023 summarises the state of knowledge of climate change, its widespread impacts and risks. The Synthesis Report states that *'continued global warming is projected to further intensify the global water cycle, including its variability, global monsoon precipitation, and very wet and very dry weather and climate events and seasons'*. The IPCC's projections are evident in extreme climate events occurring across the world.

According to the World Meteorological Organisation's 'State of the Global Climate Report 2024' published in March 2025[7], atmospheric concentration of CO2, methane and nitrous oxide in 2023 reached the highest levels in the last 800,000 years. These levels continued to increase in 2024. The report also states that the year 2024 was the warmest year on observational record, with temperatures exceeding 1.5° C above pre-industrial levels[8].

"The European State of the Climate Report 2024" produced by World Meteorological Organization and European Union[9] indicated that:

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[2] *Climate Action Plan 2025 https://assets.gov.ie/static/documents/Climate_Action_Plan_2025_updated_cover.pdf*
[3] *CCAC Annual Review 2025 - Our Changing Climate in 2024* https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC%20AR25%20Our%20Changing%20Climate-final.pdf
[4] *EPA press releases for 2025* https://www.epa.ie/news-releases/news-releases-2025/epa-projections-show-ireland-off-track-for-2030-climate-targets.php
[5] *Climate Change 2021 'The Physical Science Basis' (Intergovernmental Panel on Climate Change, August 2021)*
[6] *Climate Change 2023 Synthesis Report (IPPC)* https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_FullVolume.pdf
[7] *State of the Global Climate 2024 (World Meteorological Organisation, March 2025)*
[8] *State of the Global Climate 2024 (World Meteorological Organisation, March 2025)*
[9] *The European State of the Climate Report 2024 (World Meteorological Organization and European Union, April 2025)*

- Global average values of surface air and sea surface temperatures have increased significantly since the pre-industrial era, by around 1.3° C to 1.4° C and 1° C, respectively.
- Since 1999, an average sea level rise of around 3.7mm globally and 2mm-4mm in the European region has been observed.
- A record increase in CO2 (+2.4 ppm) and methane (+12 ppb) has been observed since 2020.
- Glaciers in Scandinavia and Svalbard recorded their highest annual rates of mass loss and saw the largest mass loss of any glacier region globally.
- In 2024, Europe experienced the most widespread flooding since 2013.

"Ireland's Climate 2024 Provisional Summary Report" produced by MET Eireann[10], 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.
- Seven named storms impacted Ireland in 2024, with Storms Isha and Darragh both producing particularly violent storm-force winds.

The IPCC's Sixth Assessment Report does not, however, conclude 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 Project will contribute to the decarbonisation of the energy sector and reduce harmful emissions. In this regard, it is compliant with national and international climate change policy and targets.

2.2.1 International Climate Change Policy

United Nations Framework Convention on Climate Change

In 1992, Ireland 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 and 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 which moved to extend the Kyoto Protocol's commitments until 2020, and 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 GHGs to be reported on by Parties in the second commitment period; and

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

- 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. An annual Conference of Parties (COP) has been established building upon the Protocol, with the Paris Agreement (COP21) shifting the focus to all countries not just developed nations.

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 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 (UN) 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 Sixth Assessment Report (2021), outlined above, further collaborates this need to limit any increase in global average temperature to 1.5°C, stating that (underlined for emphasis):

> *"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 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 the 21st session of the COP 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, Spain. The conference was characterised by repeated warnings from civil society (National Government Organisations and corporates) on emerging evidence and scientific consensus on climate change risk. Specifically, it was noted that there is 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. 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 were supported by 23 EU nations, including Ireland, as well as countries in Latin American, 5 no. Pacific Islands and 2 no. countries in the Caribbean.

COP26 Glasgow

COP26 took place in Glasgow, Scotland between the 31st of October and 12th November 2021. The summit was centred around the fact that *"climate change is the greatest risk facing us all".*

The key items COP26 seeks 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 Sharm el-Sheikh

COP27 took place in Sharm el-Sheikh, Egypt from the 6th to the 20th of November 2022. COP27 centred around three major topics:

- Closing the emissions gap to keep the 1.5°C goal 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. After further discussion, a consolidated final document was produced and, while it removed much of the vague wording of the first 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 was delayed due to the stance of China and India, among others, who were not comfortable with the 'phase out' of coal wording in the draft text. This led to the watering down of this commitment to a 'phase down' of coal use. The hope was that COP27 would work to include further language on coal and fossil fuel reduction efforts. However, the wider commitment to phase out all fossil fuels, led by India, and backed by the US and the EU, was taken out and can be marked as the biggest disappointment of COP27.
- **1.5°C Pathway:** The 1.5°C warming limit has been retained. It gives key political signals that the phase down of all fossil fuels is happening.

- **Climate Finance & Loss and Damage:** An initiative known as the Global Shield Against Climate Risk (GSACR) was launched by the V20[11] and G7[12]. The intention of this initiative has been framed as an insurance policy backed by the World Bank to prepare and protect those most vulnerable to climate change disasters.

COP28 Dubai

COP28 took place in Dubai, United Arab Emirates was held from the 30th of November until the 13th December 2023. The Conference recognised the urgent need to reduce GHG emissions and emphasised the importance of mitigating climate change. The agreement reached at the COP provided a significant boost to renewable energy industries and set the stage for countries to prioritise clean and sustainable energy generation. By committing to this transition, the international community took a crucial step towards addressing climate change and creating a more sustainable future. Key actions arising from COP28 include:

- Adoption of enhanced climate commitments and targets by participating countries, aimed at limiting global temperature rise to 1.5 degrees Celsius above pre-industrial levels.
- Development of mechanisms and strategies for implementing these commitments, including the mobilisation of financial resources to support developing nations in their climate mitigation and adaptation efforts.
- Advancing the implementation of the Paris Agreement, with a focus on transparency, accountability, and reporting of progress.
- Accelerating the global transition to clean, renewable energy sources and phasing out fossil fuel subsidies.
- Promoting nature-based solutions and conservation efforts to mitigate climate change and preserve biodiversity.
- Addressing the impacts of climate change, such as adaptation measures for vulnerable communities and sectors.
- Collaborating on international climate finance mechanisms, carbon pricing, and technology transfer to support climate action globally.
- Strengthening international partnerships and cooperation to foster shared responsibility and collective action in addressing climate change.

The final COP28 text includes a pledge whereby signatory countries commit to work together to triple the world's installed renewable energy generation capacity to at least 11,000GW by 2030, taking into consideration different starting points and national circumstances.

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 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 1,500GW 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

[11] *Vulnerable Twenty Group countries*
[12] *Group of Seven countries*

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.

COP30 Belém

COP30 took place in Belém, Brazil between the 10th and 21st of November 2025, marking the first UN climate summit hosted within the Amazon region. It was framed as the "Implementation COP", progressing the post-Paris Agreement framework from pledges to delivery after the first Global Stocktake (GST-1). Key actions arising from COP30 include:

- Launch of the 'Global Implementation Accelerator', a voluntary initiative designed to support rapid, high-impact interventions. It creates a structured space for countries to receive technical support, identify barriers, and coordinate investment strategies. Its remit covers a wide spectrum of mitigation and adaptation priority areas, including renewable energy deployment, battery storage, methane reduction, digital grid management, and crucial nature-based interventions.
- Through the Belém Package, Parties committed to accelerating *"zero- and low-emission technologies"* in hard-to-abate sectors such as industry, transport and power.
- COP 30's redefined Action Agenda included 117 'Plans to Accelerate Solutions' (PAS) across sectors, many of which target low-carbon energy, industrial decarbonization, and clean system deployment.
- COP30 set a long-term ambition to mobilise USD 1.3 trillion annually by 2035 for climate action. This finance is intended to help scale clean energy infrastructure (such as renewables, storage and grid infrastructure), support adaptation, and enable just transitions.

COP30 made strong progress on tools, mechanisms and political momentum for scaling renewable energy, improving efficiency and enabling just transitions. However, the inability to deliver a clear, binding fossil fuel phase-out remains a major barrier to aligning global energy systems with the 1.5°C pathway.

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 European 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 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 European 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:

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

The European Climate Law[13] 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 European Climate Law includes:

[13] *European Climate Law was published in the Official Journal on 9th July 2021 and came into force on 29th July 2021*

- A legal objective for the EU 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 EU 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[14] 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, which is crucial to Europe becoming the world's first climate-neutral continent by 2050, will only be achieved through the permitting and construction of renewable energy projects, such as the Proposed Project.

Regulation (EU) 2026/667

Regulation (EU) 2026/667 of the European Parliament and the Council was adopted on the 11th of March 2026. The Regulation amends Regulation (EU) 2021/1119 with regard to the setting of an EU intermediate climate target for 2040.

Considering the scientific advice of the European Scientific Board on Climate Change and a detailed impact assessment, the Regulation sets a legally binding intermediate climate target of a 90% reduction in GHG emissions by 2040, compared to 1990 levels.

The Regulation supports the European Climate Law's objective of climate neutrality by 2050. The Proposed Project by generating and providing renewable energy to the national electricity grid, will support the decarbonisation of the electricity sector, which will support the decarbonisation of other sectors. The Proposed Project by reducing reliance on GHG emitting fossil fuels will support the achievement of a 90% reduction in GHG emissions by 2040 (relative to 1990 levels) and climate neutrality by 2050.

2.2.1.2 Project Compliance with International Climate Policy

Based on a review of key international climate policy documents, it is clear that the Proposed Project will contribute to reducing dependence on fossil fuels for electricity generation. This move supports the objectives of the UNFCCC to limit global temperature increases driven by climate change, as well as the goals set out in the Kyoto Protocol and various COP agreements outlined above. By making a just transition to more renewable forms of electricity generation, the level of carbon emissions will drop as our reliance on non- renewable forms of energy lessen.

The Proposed Project is also considered to be in line with the European Green Deal, European Climate Law and Regulation (EU) 2026/667, which also aim to reduce carbon emissions and achieve net zero carbon emissions by 2050. These goals are not likely to be met if projects, such as Proposed Project, are not implemented. The construction of this renewable energy development would also 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 vulnerability to price fluctuations and geopolitical risks associated with fossil fuel imports.

[14] *'Fit for 55': delivering the EU's 2030 Climate Target on the way to climate neutrality (July 2021)*

2.2.2 National Climate Change Policy

Programme for Government – Securing's 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"*.

The Programme states that the next ten years will be a critical period in addressing the climate crisis, and therefore, a deliberate and swift approach to reducing more than half of Ireland's carbon emissions over the course of the decade (2020-2030) must be implemented. The programme states that the Government are committed to reducing GHG emissions by an average 7% per annum over the next decade in a push to achieve net -zero emissions by the year 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 take *"the necessary action to deliver at least 70% renewable electricity by 2030"*. This target has been updated by subsequent Climate Action Plans.

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

The Climate Action and Low Carbon Development Act 2015 (as amended) ('the Climate Act') establishes a legislative precedent to reduce Ireland's carbon emissions. The Climate Act legally binds Ireland to achieve net zero emissions no later than 2050, and to a 51% reduction in emissions by 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 (CCAC) should equate to a total reduction of 51% over the period to 2030, relative to a baseline of 2018;
- The role of the CCAC 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; and
- Local Authorities must prepare individual Climate Action Plans which will include both mitigation and adaptation measures and will be updated every five years.

The National Climate Policies and Objectives all support the Proposed Project, and by implication the consenting, subject to proper planning, of renewable energy developments.

Obligations under the Climate Act and the Planning Act

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 National Climate Policies and Objectives listed in Section 15, with which ACP decisions must be consistent, all support the development of onshore wind energy in accordance with proper planning and sustainable development.

The implications for public bodies (which include Planning Authorities) in exercising their functions in accordance with Section 15 of the Climate Act has been scrutinised by the Irish legal system. The legal analysis of Section 15 has arisen from a challenge to a decision of ACP to refuse planning permission for a wind farm in County Laois.

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

Planning Authorities (which include MCC and ACP), in making a decision on applications for renewable energy developments (such as the Proposed Wind Farm and the Proposed Grid Connection), must meaningfully engage with national climate objectives when exercising their decision-making functions. Planning Authorities must also ensure that their decision on an application falls within a spectrum of outcomes which can be considered to be consistent with, in so far as practicable, national climate objectives.

The Proposed Project is a renewable energy development, with an estimated capacity of 31.5 megawatts (MW). For this reason, it is clear that the Proposed Project, if granted, would contribute to national climate objectives and targets. There are no mandatory and non-fixable legal requirements that prevent the Planning Authorities from reaching an outcome, in relation to the Proposed Project, that favours policy goals, i.e. granting permission.

Carbon Budgets

The first national carbon budget programme proposed by the CCAC, approved by Government and adopted by both Houses of the Oireachtas in April 2022 comprises three successive 5-year carbon budgets[15]. The total emissions allowed under each budget are shown in **Table 2-1** below.

Table 2-1 Carbon Budgets of the Climate Change Advisory Council

	2021 – 2025 Carbon Budget 1	2026 – 2030 Carbon Budget 2	2031 – 2035 Provisional Carbon Budget 3
	All Gases		
Carbon Budget (Mt CO2eq)	295	200	151

[15] *Climate Change Advisory Council Carbon Budget Technical Report (October 2021)* https://www.gov.ie/en/publication/9af1bcarbon-budgets/

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

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

The Environmental Protection Agency (EPA) projections[16] published in May 2025 show that the Sectoral Emissions Ceiling for electricity will be exceeded for the first budget (2021-2025) and second budget period (2026-2030) with projected emissions of **40.4 Mt CO2eq** and **21.6 Mt CO2eq respectively** under the best-case (With Additional Measures (WAM)) scenario. Under the WAM scenario, the total carbon budget sectoral ceiling for the second budget period (2026-2030) of **200 Mt CO2eq** is expected to be exceeded by a significant margin (c. 35%) with projected emissions of **269.7 Mt CO2eq.** The transport and industrial sectors are predicted to exceed their Sectoral Emissions Ceiling to the greatest degree. The EPA reported in May 2025[17] that the first two national carbon budgets, which aim to facilitate the 51% emissions reduction target, would not be met. The first national carbon budget (2021-2025) is projected to be exceeded by 3% to 4% while the **second national carbon budget** (2026-2030) is forecast to be **exceeded by a significant margin of 38% to 57%.** The EPA analysis shows a widening gap between projected emissions reductions based on planned climate policies and measures and the 51% emissions reduction target based on updated information provided by Governmental bodies. It states that '*planned climate policies and measures, if fully implemented, could deliver up to 23% emissions reduction by 2030 compared to 2018, down from the 29% reduction projected last year.*' As identified by the EPA, this points to the need to accelerate and scale up the transition to an environmentally sustainable and climate-neutral economy.

The Proposed Project will provide **carbon savings of c. 690,588 tonnes** over the proposed 35-year lifetime of the wind farm as detailed in **Chapter 11** and will directly support the reduction in emissions from the electricity sector and will facilitate emissions reductions across society and all sectors of the economy through the increased supply of renewable energy.

Report of the Joint Committee on Climate Action - Climate Change: A Cross-Party Consensus for Action (2019)

In March 2019, the Joint Committee on Climate Action Change released a report detailing a cross-party consensus for action. In 2019 there was already a concern that Ireland's performance in meeting international and national obligations was inadequate, and concerns remained regarding emission projections and the ability to meet 2030 targets under relevant EU Directives.

The report states that a transformation of Ireland's energy system will be required for the country to meet its future 2030 and 2050 GHG emission targets; specifically, in order to reach net zero emissions by 2050, Ireland will be required to fully decarbonise its electricity generation. Therefore, there is a clear incentive for developing, and safeguarding, Ireland's capacity in renewable energies and renewable electricity. Since this report was published, the Climate Act has been enacted and there have been recent

[16] *EPA Ireland's Greenhouse Gas Emissions Projections 2024-2025 (May 2025) available at: Ireland's Greenhouse Gas Emissions Projections 2023-2050*
[17] *EPA press releases for 2025 - EPA Projections Show Ireland off Track for 2030 Climate Targets (May 2025) available at: https://www.epa.ie/news-releases/news-releases-2025/epa-projections-show-ireland-off-track-for-2030-climate-targets.php*

progress / future scenario assessments (e.g., EirGrid's 'All Island Generation Capacity Statement 2022 – 2031' (October 2022)).

Given the clear concern that the county's future emissions targets may be missed, it is crucial that projects, such as the Proposed Project, which can contribute in a meaningful manner towards climate change targets, and which can be provided without significant adverse environmental effects arising, are brought forward and supported with favourable consideration through the planning system and are constructed.

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 up to 2035 and beyond to meet Ireland's commitment to becoming carbon neutral by 2050. CAP23 sets out a roadmap to deliver on Ireland's climate ambition and is aligned to ensure that Ireland achieves its legally binding target (the Climate Act) 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, to prevent/ mitigate the potentially devastating consequences of climate change on Ireland's environment, society, economy and natural resources. 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 of 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 out 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 the portion of renewable electricity of 80% by 2023 will come in part from a targeted 9GW of onshore wind. CAP23 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 12 of CAP23 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, falling by 19% between 2005-2012 and by 33% between 2012 and 2020. This trend is largely due to the 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, and the recognition of the central 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. This means an average of 8 MtCO2eq per annum. Emissions for the period 2021 were 9.98 MtCO2eq, which is in exceedance of 8 MtCO2eq, which means that to keep on track, electricity will now have to achieve annual emissions of c. 7.5 MtCO2eq from 2022 to 2025. The measures set out for electricity sector include *inter alia*:

- Reduce annual CO2eq. emissions from the sector to 3 MtCO2eq by 2030 (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 6 GW 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 county development plans are obliged to set out objectives to facilitate energy infrastructure.

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

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 and 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 of 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****." (emphasis added)*

CAP24 identifies the alignment of local and national policy as 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 policy support for the provision of additional renewable energy generators, such as the Proposed Project.

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 well-defined course of action 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 (at least 5GW by 2030), and solar energy (up to 5GW by 2025; 8GW by 2030).

CAP25 recognizes that *"A renewables-led system is at the core of Ireland's plan to radically reduce emissions in the electricity sector, protect our energy security, and ensure our economic competitiveness. This requires the accelerated and increased deployment of new renewable electricity generation capacity and related infrastructure."*

CAP25 also lays emphasis on the importance of aligning local and national policies to accelerate the rollout of renewable energy:

> *"The Planning and Development Act, 2024, the Renewable Energy Directive and the revised NPF together will ensure greater alignment between national, regional, and local authority levels to deliver on the renewable electricity ambition.*
>
> *The draft first revision of the NPF includes policy support for the development and upgrading of electricity grid infrastructure, the delivery of renewable electricity generation capacity, and the introduction of regional renewable electricity capacity allocations for each of the three Regional Assemblies by 2030."*

CAP25 sets out a clear roadmap to achieve Ireland's climate ambition, including specific 2030 targets and decarbonisation objectives. This roadmap provides strong policy support for the provision of additional renewable energy generators, such as the Proposed Project, to reach these targets.

2.2.2.2 Project Compliance with National Climate Policy

The Proposed Project aligns with the national climate policy objectives. The Proposed Project will make a significant contribution to achieving the CAP25 target of 9GW of onshore wind energy by the year 2030. Furthermore, the Proposed Project will aid Ireland in adhering to, or limiting the exceedance of, the country's carbon budgets. Currently, the electricity sector is rapidly approaching the designated sectoral ceiling of 40 MtCO2eq for the first carbon budget period from 2020 to 2025. The national renewable energy targets and the carbon budgets are integral to the government's response to the climate crisis.

2.3 Renewable Energy Policy and Targets

This section of the EIAR provides a breakdown of international and national renewable energy policy with regard to the Proposed Project. Under this section, the following are discussed:

- EU Renewable Energy Policy
- National Renewable Energy Policy

National policy has developed in line with European and international policies, targets and commitments, in that the importance and urgency of decarbonising the energy generation sector, the economy in general and reducing GHG emissions has become increasingly more apparent.

The Proposed Project complies with the nationally stated need to provide a greater amount of renewable energy onto the national grid and will further reduce the national reliance on fossil fuels for electricity generation.

2.3.1 European Renewable Energy Policy

Renewable Energy Directive

The Renewable Energy Directive ('RED') 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 RED in 2009, it has undergone several revisions, the most recent of which occurred in November 2023. 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[18]. Of the 27 EU member states, the lowest proportions of renewable energy generation was recorded in Ireland (13.1%). Crucially, the RED 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 packages. In RED II, the overall EU target for Renewable Energy Sources consumption by 2030 was raised to 32%.

RED III – 2023

In November 2023, a revision of the Renewable Energy Directive[19] (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 REPowerEU plan in May 2022. RED III also introduces specific targets for Member States in the industry, transport, and building (district heating and cooling) sectors.

Under Article 15c of RED III, EU member states must identify 'Renewables Acceleration Areas' of where projects will undergo a simplified and fast-track procedure. RED III defines the timeframes for the permit-granting procedure. In Renewables Acceleration Areas, the permit-granting procedure shall not exceed 12 months for renewable energy projects and outside renewables acceleration areas the permit granting procedure shall not exceed two years.

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

Article 16f of RED III states:

[18] https://ec.europa.eu/eurostat/en/web/products-eurostat-news/w/ddn-20231222-2 15
[19] *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.

In August 2025, some of the provisions of RED III were transposed into national law through the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. No. 274 of 2025). This legislation was adopted for the purpose of giving effect to Articles 15e(5), 16, 16b, 16c(2), 16d, 16e and 16f of the RED III Directive.

The legislation introduces new decision timelines based on a "completeness check" (ss.34E, 37JB, 295B): 52 weeks for new wind farms, 30 weeks for repowering projects, and one to two years for IROPI cases (two years for projects over 150 kW, one year for projects under 150 kW or repowering). Importantly, renewable energy developments, including related grid and storage infrastructure, are now presumed to be in the **overriding public interest**.

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 RED (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.

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.

The Proposed Project will aid in achieving the scenarios set out in the Energy Roadmap 2050, by increasing the share of renewable energy being produced onto the national grid thereby reducing the reliance on more unsustainable forms of electricity production.

REPowerEU

REPowerEU, launched in May 2022 by the European Commission, proposes an outline of a plan to make Europe independent from Russian fossil fuels, starting with gas, due to the high and volatile energy

prices, and security of supply concerns following Russia's unprecedented military attack on Ukraine. Currently, the EU imports 90% of its gas consumption, with Russia providing around 45% of those inputs. Russia also accounts 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.*

In September 2023, the European Parliament agreed to update the RED (RED III). The updates including raising the share of renewables in the EU's final energy consumption to 42.5% by 2030 with Member States encouraged to achieve 45% and a more efficient approval procedure for deploying renewables in Europe. In addition, as a part of the REPowerEU Plan, the European Commission has proposed a series of additional targeted amendments to the renewable energy directive to reflect the ongoing changes in the energy landscape and the continued invasion of Ukraine. This will make the sector more efficient and reach the set goals faster.

In addition, the REPowerEU Plan highlights the overriding public interest in achieving renewable energy targets. The REPowerEU Plan states that: *"the revised proposal operationalises the principle of renewable energy as an overriding public interest, introduces the designation of 'go-to' areas and other ways to shorten and simplify permitting while also minimising potential risks and negative impacts on the environment".* This highlights the importance of public interest and incentive to achieve the renewable energy target, highlighting the importance of appropriate designation of sufficient areas for wind energy development by local authorities within the EU.

AccelerateEU

AccelerateEU was launched by the European Commission in April 2026. AccelerateEU addressed the EU's rising energy costs and the acceleration of the renewable energy transition to strengthen energy resilience.

AccelerateEU sets out five pillars which set out the key areas of action of the plan, they are as follows:

1. *Closer EU coordination,*
2. *Protecting consumers and businesses,*
3. *More homegrown clean energy,*
4. *Stepping up our energy system, and*
5. *Boosting investments.*

The two pillars relevant to the Proposed Project relate to increasing indigenous renewable energy and improving our energy system. The Proposed Project which is an indigenous renewable wind energy development with an onsite 110kV substation that will produce and increase Irelands renewable energy capacity and will provide a new substation which will connect to the national electricity grid.

2.3.1.2 Project Compliance with EU Policy

The Proposed Project is fully aligned with, and supported by, relevant EU energy and climate policy. It will contribute to the objectives of the 2030 Climate and Energy Framework, including the EU-wide binding targets of achieving at least 27% renewable energy and 27% energy efficiency by 2030. Additionally, the Proposed Project supports the increased ambition to raise the share of renewables in the EU's energy mix from 32% to a minimum of 42.5% by 2030.

The EU Energy Roadmap 2050, which outlines pathways to meet long-term climate and energy goals, highlights that all projected scenarios foresee renewables as the dominant source of energy supply by 2050. As such, the Proposed Project aligns with this long-term vision.

Regulation 2022/2577 introduced significant measures to facilitate the acceleration of the deployment of renewable energy, including an obligation on member states to prioritise the roll out of renewable energy projects when balancing competing legal interests. Furthermore, the REPowerEU plan, which aims to enhance energy security and accelerate the integration of renewables into the EU grid, explicitly calls for faster permitting processes for renewable projects and improvements to grid infrastructure. The Proposed Project directly supports these objectives and is therefore considered to be strongly underpinned by current EU energy policy.

The provisions of RED III and the REPowerEU Plan are applicable to the current planning application and EIAR, and they provide further justification for granting consent for the Proposed Project.

2.3.2 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 then Department of Communications, Climate Action & Environment (DCCAE) 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 an extensive consultation process, the Government published the White Paper 'Ireland's Transition to a Low Carbon Energy Future 2015–2030' in December 2015. This document, produced by the then Department of Communications, Energy and Natural Resources (DCENR), provides an updated energy policy framework to guide Ireland's transition to a low-carbon energy system through 2030 and towards 2050. It outlines the Energy Vision 2050, which targets an 80–95% reduction in energy sector GHG emissions (compared to 1990 levels), primarily through increased renewable electricity generation and greater use of electricity and bioenergy in heating and transport.

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.

The White Paper highlights onshore wind as Ireland's leading and most cost-effective renewable resource, noting its high efficiency and lower support costs due to the country's strong wind profile. It also recognises the growing competitiveness of solar technology and its potential to enhance energy security, meet renewable targets, and stimulate economic growth. It states:

> *"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 National Energy Security 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 European Union 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 Sustainable Energy

Authority of Ireland's (SEAI) Energy in Ireland (2025) report, oil accounted for 49% of Ireland's primary energy requirement in 2024, making it one of the highest rates of oil dependency in the EU. The International Energy Agency (IEA), 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.

The Government published an update to this in November 2023 which outlines a new strategy to ensure energy security in Ireland for this decade, while ensuring a sustainable transition to a carbon neutral energy system by 2050. The Energy Security Package emphasizes the need to prioritize, monitor, and regularly review energy security during the transition period. It proposes measures focusing on:

1. *Reduced and Responsive Demand.*
2. *Renewables-Led System.*
3. *More Resilient Systems.*
4. *Robust Risk Governance*

The report details mitigation measures under each area, such as expanding indigenous renewable energy capacity, diversifying fuel sources, and enhancing governance structures. Lessons from European energy supply disruptions and domestic electricity sector challenges inform the strategic approach.

Six key pillars guide the response and recommendations outlined in 'Energy Security in Ireland to 2030', which includes a public consultation and external reviews. The Government plans to release follow-up reports every five years, with implementation oversight by the Government's Energy Security Group. Having regard to the above, it is clear that the provision of additional renewable energy generation, such as the Proposed Project 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 2023, the energy security package titled 'Energy Security in Ireland to 2030' 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."*

Independent research undertaken as part of the package, McCarthy Report[20], provides an analysis of developments in the electricity sector in Ireland. The McCarthy Report makes the following observation in relation to the consenting process:

[20] https://www.gov.ie/pdf/?file=https://assets.gov.ie/276441/eb496e01-5c01-4594-af09-74342b4ac971.pdf#page=null

> *"The problem of delays encountered by major infrastructure projects, including in the electricity system, due to planning and environmental consent issues was evident. They had been commented upon by the International Energy Agency in its 2019 review of Ireland which named planning delays as the principal challenge to delivery of policy for the sector."*

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. The additional measures most relevant to the Proposed Project is Action 10 which is *"To implement Planning and Consenting System Reforms and provide greater certainty to the sector"*.

The energy security package 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 RED and REPowerEU.

The Proposed Project will directly support the government's goal of enhancing national energy security by acting as a domestic source of renewable electricity. By supplying clean energy to the national grid, it will contribute to the transition toward a renewables-driven energy system.

2.3.2.2 Project Compliance with the National Renewable Energy Policy

The National Energy Security Framework outlines several steps to accelerate Ireland's shift to renewable energy initiatives. It is evident that the Proposed Project aligns with this framework by increasing the proportion of renewable energy on the national grid, thus expediting Ireland's transition to a low-carbon energy future.

2.4 Climate and Renewable Energy Target Progress

At a European level, the latest data shows that, as of 2024, 25.2% of energy came from renewable energy sources[21]. This represents an increase of 0.8% compared to 2023 levels. While progress is being made to increase the share of renewable energy, it is clear that all EU member states need to intensify their efforts to collectively comply with the target of 42.5% set in the latest revision of the renewable energy directive.

Of the 27 EU member states, Ireland had one of the lowest proportions of renewable energy at 16% in 2024[22]. It is evident that Ireland is not performing well when compared against our European counterparts and that urgent action is required to increase the overall share of renewable energy in our gross final energy consumption. When it comes to the share of renewable energy in electricity, Ireland does perform better generating 41.3% in 2024, but still below the EU average of 47.5%[23].

[21] https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Renewable_energy_statistics
[22] https://ec.europa.eu/eurostat/statistics-explained/index.php?title=File:Renewable_energy_2024_infographic.jpg
[23] https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Renewable_energy_statistics

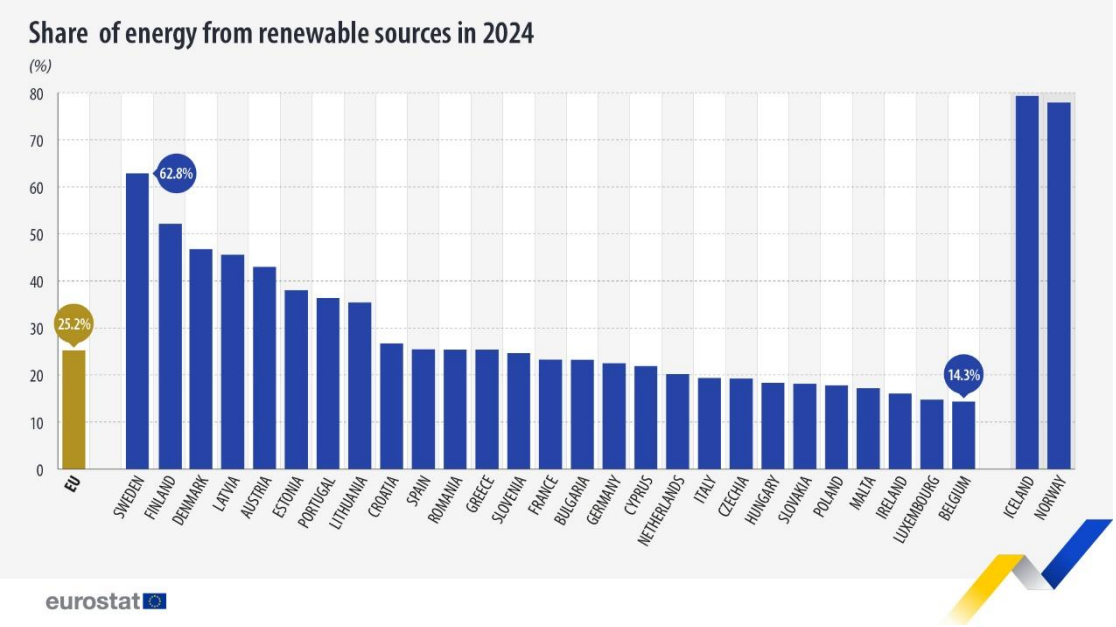


Figure 2-1: Overall share of energy from renewable sources (source: Eurostat)

Ireland's Greenhouse Gas Emissions Projections 2024-2055 (May 2025)

The EPA publishes Ireland's Greenhouse Gas Emission Projections and at the time of writing, the most recent report, 'Ireland's Greenhouse Gas Emissions Projections 2024–2055' was published in May 2025. The report includes an assessment of Ireland's progress towards achieving its emission reduction targets out to 2030 set under the EU Effort Sharing Regulation 2018/842 (ESR).

The EPA has produced two scenarios in preparing these GHG emissions projections: a "With Existing Measures" (WEM) scenario and a "With Additional Measures" (WAM) scenario. These scenarios forecast Ireland's GHG emissions in different ways. The WEM scenario assumes that no additional policies and measures, beyond those already in place by the end of 2023. 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 the latest government policies and measures (at the time the Projections are compiled) to reduce emissions such as those in Ireland's CAP25.

The EPA Emission Projections Update notes the following key trends:

- Ireland is not on track to meet the 51% emissions reduction target (by 2030 compared to 2018) based on these projections which include the CAP25 measures. GHG emissions are projected to be 9% to 23% lower by 2030 (compared to 2018), placing Ireland further from the 2030 National climate target when compared to previous assessments.
- Budget period 1, 2021-2025, of 295 Mt CO2eq is projected to be exceeded by 8 to 12 Mt CO2eq. Budget period 2, 2026-2030 of 200 Mt CO2eq is also expected to be exceeded by a significant margin of 77 to 114 Mt CO2eq (with carryover from Budget period 1).
- Ireland will not meet its non-Emissions Trading Scheme (ETS) EU targets of a 42% emissions reduction by 2030 even with flexibilities applied. The assessment shows a reduction by 13% to 26% by 2030 with the use of flexibilities.
- Sectoral emissions ceilings for 2025 and 2030 are projected to be exceeded by the Buildings, Electricity, Industry and Transport sectors.
- Emissions from the Energy Industries sector are projected to decrease by between 59 and 68%. Renewable energy generation at the end of the decade is projected to range from 60 to 68% of electricity generation.

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 Project, must be encouraged and supported if carbon -saving targets are to be met.

National Energy Projections (September 2025)

The National Energy Projections report, published by the SEAI in September 2025, sets out the most recent updates to Ireland's progress towards its binding European and national renewable energy targets.

In 2018, RED II 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. RED III increased the binding EU-wide target for overall RES to at least 42.5% with Ireland subsequently increasing the 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.

The most notable conclusion drawn from the Report is the significant gap between projections across both the With Existing Measures (WEM) and (With Additional Measures) WAM scenarios and the legally binding EU and national emission reductions targets. The Report states that even with full implementation of CAP24, Ireland is projected to face a significant gap in meeting many legally binding energy and climate obligations, including national carbon budgets and sectoral emissions ceilings, and EU obligations on renewable energy, energy efficiency and GHG emissions.

The SEAI projections explore the risk scenarios WEM and WAM, the aim being to address the gap between current policy trajectories and the most ambitious planned policies scenarios. The SEAI WEM and WAM scenario modelling considers the latest CAP published at the time of policy assumptions for the modelling scenarios (CAP24).

The Report projects GHG emissions under the WEM and WAM scenarios. In the WEM scenario, total GHG emissions are expected to exceed the carbon budgets for CB1, CB2 and provisional CB3 in 2025, 2029 and 2031, respectively, with a cumulative exceedance of 23% by the end of 2030. In the WAM scenario, cumulative exceedance of 16% is projected by the end of 2030. The projected overall carbon budgets exceedance has reduced from the 2024 projections, though there are still significant risks that this could increase again subject to market changes and the pace of implementation of policy.

Energy in Ireland (December 2025)

In December 2025, the SEAI released an annual publication '*Energy in Ireland'* report which looks at trends in national energy use and at the underlying driving forces, such as the economy and weather, and more recently the impacts of high energy prices. It also examines GHG emissions from energy use, energy security, cost competitiveness, and Ireland's progress towards EU renewable energy targets.

The Report identifies that Ireland's national energy-related emissions which include emissions from electricity, transport and heat were at their lowest level in over 30 years in 2024. Energy-related emissions in 2024 were 30.9MtCO$_2$eq, down 1.5% on 2023 levels. Similarly, electricity -related emissions were 6.9MtCO$_2$eq in 2024 the lowest on record, down 8.3% from 2023 levels-. The following are some of the key points, relating to renewable energy and energy emissions:

- 14.6% of Ireland's primary energy was renewable in 2024, the highest value to date.
- Ireland used 1.31 TWh more renewable energy in 2024 than in 2023.
- Ireland's RES-Overall result is now above its 2020 16% baseline target, with a 2030 target of 43%.
- Ireland's 2024 RES-Electricity result was 41.3%, up from 40.4% in 2023 – the highest value to date.
- Wind accounted for 4.59 MtCO2eq or 62.2% of the total avoided GHG emissions in 2024.

Ireland's installed wind capacity in 2024 was 4.94 GW, which indicates a 4.3% increase from the previous year. Ireland's 2025 CAP target for installed wind capacity is 6 GW, and its 2030 CAP targets for onshore and offshore capacity are 9 GW and 5 GW, respectively. SEAI's projections under the WAM scenario

indicate a total installed capacity of 9.8 GW by the end of 2030. This WAM scenario is the most optimistic reporting scenario modelled, achieving 68% RES-E by 2030.

The Report states that over the last 10-years, Ireland has added wind capacity at an average rate of 0.27 GW per annum, although this has dropped to a rate of 0.16 GW over the last 5-years. To align to the pace of the WAM projections needed to deliver on the 80% RES-E target, the rollout of onshore wind capacity needs to return to the rate previously achieved between 2016 and 2019.

Figure 1.25 of the Report, copied below in **Figure 2-2**, illustrates the year-on-year increase in installed wind capacity required to align the pace of the WAM.

Figure 1.25: Year-to-year increases in installed wind capacity to 2024, and year-to-year increases in WAM capacity projections of capacity from 2025 to 2030

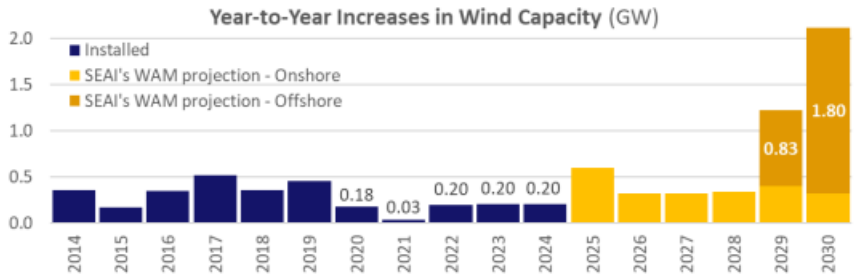


Figure 2-2: Ireland's year-to-year increases in installed wind capacity required to align the pace of the WAM

The Report also identifies a plateauing of wind generation, which is the largest contributor to renewable electricity, over the last 5 years. For four of the last five years, Ireland's wind generation has varied between 11.40 TWh and 11.87 TWh, which is only a ±2% variation. In contrast, wind generation in the preceding 5 years (2016 to 2020) showed an average annual increase of over 20%.

The Climate Change Advisory Council Annual Review 2025

The Climate Change Advisory Council (CCAC) open their 'Annual Review 2025 - Summary for All'[24] quite starkly,

> *"1. Ireland remains substantially off track in meeting its EU and national emissions reduction targets, with progress in the Agriculture and Transport sectors, which collectively account for approximately 55% of Irish emissions, proving particularly slow. The Government is urged to move from ambitious statements to implementing impactful and demonstrable actions that build momentum and public buy-in.*
>
> *2. Failure to meet targets will potentially result in substantial compliance costs, estimated to be in the range of €8–26 billion, and a colossal missed opportunity to invest in Irish households, communities and businesses – creating jobs, improving health and wellbeing, and protecting the most vulnerable in society."*

In addition, the standout recommendation from the CCAC is that "*The delay in transposing EU directives into law, particularly in relation to energy, is concerning given the urgent need to transition to a low-carbon energy system. The Council urges the Government to ensure full transposition of all climate- and energy related directives into law in advance of Ireland's presidency of the Council of the European Union in July 2026.*"

The Climate Change Advisory Council Annual Review 2025 – Electricity

The CCAC published its annual review in April 2025 where it outlines detailed observations and recommendations for the Electricity sector in Ireland. This review emphasises the urgent need for Ireland

[24] *https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR-2025-SfA-final.pdf*

to accelerate its transition to renewable energy to meet its 2030 electricity capacity targets and adhere to sectoral emissions ceilings. The CCAC states:

> *"To meet the carbon budgets, emissions from the Electricity sector will need to reach zero by the end of the 2030s. In 2024, electricity emissions fell by approximately 7% relative to 2023, reaching the lowest level since record-keeping began in 1990. This was driven by a continued decline in the use of coal for electricity generation, coupled with a notable rise in imported electricity for the second consecutive year. Renewable energy is still not being rolled out fast enough, and insufficient investment in the electricity grid means that some of the renewable energy we currently generate cannot be used. Emissions are currently projected to exceed the sectoral emissions ceiling, even in the most optimistic scenario."*

Key observations in relation to Renewable Electricity are outlined below:

- In 2024, 1.6 GW of onshore wind (0.7 GW) and solar (0.9 GW) projects received planning permission, but only 0.5 GW (0.2 GW wind, 0.3 GW solar) were connected, which is well below the 1.8 GW annual target needed to achieve 2030 targets.
- Grid constraints led to 1,266 GWh (10.1% of the total available wind energy) of wind and energy being curtailed.
- During 2024, an additional 0.5 GW (0.2 GW wind and 0.3 GW solar) of new utility scale renewable capacity was connected, representing a decrease compared with the 0.6 GW connected in 2023 and significantly below the 1.8 GW annual average increase in capacity that is required to meet 2030 targets.

The Climate Change Advisory Council Annual Review 2026

In March 2026 the CCAC published their 'Annual Review 2026: Our Changing Climate in 2025' which examines national and global climate data. The CCAC asserts that Ireland's climate is changing, with data indicating that 2025 was the second-warmest year on record. Key observations made by the CCAC in relation to GHG emissions are outlined below:

- *The levels of carbon dioxide, methane and nitrous oxide in the atmosphere have reached their highest points in recorded history. The record high concentrations are accelerating global warming and turbocharging more extreme weather events, which continued to have cascading impacts on lives, livelihoods, food systems and ecosystems around the world in 2025.*
- *The global average concentration of carbon dioxide increased by 3.5 parts per million between 2023 and 2024. This was the biggest annual increase since records began and was driven by the continued burning of fossil fuels and a spike in wildfires. Global efforts to reduce greenhouse gas emissions and enhance carbon removals are failing to materialise at the pace and scale needed to keep the Paris Agreement's temperature goal within reach. This underscores the need for sectors to plan for and address the risks of overshooting global temperature goals (e.g. higher warming scenarios exceeding 1.5°C or 2°C).*

The CCAC calls attention to the shortcomings in the global effort to reduce GHG emissions, stating that:

> *"Concentrations of major greenhouses gases – carbon dioxide, methane and nitrous oxide – have reached their highest ever recorded levels. Global emissions reduction efforts are failing, leading to continued warming and further increasing the likelihood and intensity of extreme events."*

The review by the CCAC provides a stark outlook on Ireland's changing climate, stating that "*the latest Irish climate change projections indicate further warming in the future*". The CCAC affirms that record high concentrations of GHG emissions in the atmosphere are accelerating global warming and extreme weather events. It is also made apparent that efforts to reduce global GHG emissions are failing and that more action is needed to reduce GHG emissions. The Proposed Project, by producing and providing renewable wind energy to the national electricity grid will reduce Ireland's reliance of GHG emitting fossil fuels for energy generation, supporting the reduction in GHG emissions.

The Climate Change Advisory Council Annual Review 2026 – Electricity

The CCAC published its 'Annual Review 2026 – Electricity' in May 2026 where 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 targets and adhere to sectoral emissions ceilings. The CCAC states:

> *"Renewable generation capacity reached 7.7 GW by the end of 2025; however, only 0.8 GW of new solar and wind capacity was added, far below the 2 GW needed annually to meet the 2030 Climate Action Plan target of up to 23.6 GW. Targets were also missed for the share of electricity demand met by renewables, with rising data centre demand offsetting gains in renewable generation, and for dispatch-down, which reflects renewable electricity that is wasted due to grid limitations."*

Key observations in relation to renewable energy are outlined below:

- *Ireland reached 7.7 GW of renewables generation capacity by the end of 2025, with 5.1 GW from onshore wind, 1.1 GW from grid-scale solar, 0.8 GW from domestic rooftop solar and 0.7 GW from other renewable sources (e.g. hydro).*
- *Only 0.6 GW of new solar capacity and 0.2 GW of new wind capacity were added in 2025, far less than the 2 GW that needs to be added each year until 2030 to hit Climate Action Plan targets.*
- *2025 saw the failure of multiple key Climate Action Plan targets, including both onshore wind and solar capacity, dispatch-down and renewable electricity share of demand. The renewable electricity share of demand has stagnated in recent years due to any added renewable generation capacity being matched by increasing data centre electricity demand.*

The CCAC provides significant observations in relation to renewable energy, particularly that only 0.2 GW of wind energy capacity was added in 2025, if this trend is to continue Ireland will not achieve its 9GW onshore wind energy capacity target by 2030, as set out in CAP25. The Proposed Project provides an opportunity to generate and increase renewable wind energy capacity and will support with the achievement of CAP25 targets of 80% renewable energy share and 9GW onshore wind energy capacity by 2030.

Ireland's Climate Change Assessment (January 2024)

In January 2024, the EPA published Ireland's 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 4: Realising the Benefits of Transition and Transformation

The ICCA Synthesis Report states that having peaked in 2001, Ireland's GHG emissions have reduced in all sectors except agriculture. However, Ireland currently emits more GHGs per person than the EU average. The ICCA Synthesis 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.

In relation to Ireland's target of achieving net -zero carbon dioxide emissions by 2050 and the role renewable energy will contribute to this; the ICCA Synthesis Report states the following:

"There are well-established 'no-regret options' that need to happen now, which can get us 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 help get us all the way. Ireland's no regret options are demand reduction (e.g. through energy efficiency and reduced consumption), electrification (e.g. electric vehicles and heat pumps), deployment of market-ready renewables (e.g. wind energy and solar photovoltaics) and low-carbon heating options (e.g. district heating), while our 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."

2.5 Planning Policy Context

2.5.1 Introduction

This section of the EIAR provides the strategic planning context of the Proposed Project. 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
- Other Relevant Material Considerations

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 and has been designed in the context of the relevant wind energy and other guidelines. The specific compliance with the National, Regional and Local/County Development Plan provisions is dealt with in detail in the sections below.

2.5.2 National Planning Policy

The Planning and Development Act 2024

The Planning and Development Act 2024 ('the 2024 Planning Act') was signed into law by the President on the 17th of October 2024, following its passage through both Houses of the Oireachtas. However, the provisions of the Planning and Development Act 2000 ('the 2000 Act') continue to apply until such time as the replacement provisions of the 2024 Act are commenced by Ministerial Orders. The Government has approved an Implementation Plan for the New Planning Act, published on the 4th of March 2025, which sets out the schedule for its phased commencement. Concurrently, work is ongoing to revise and update the supporting Regulations that will underpin the operation of the 2024 Planning Act. The full 2024 Act is expected to have been commenced by late 2026.

The planning applications for the Proposed Wind Farm and Proposed Grid Connection will account for the latest commenced provisions of the 2024 Planning Act at the time of submission.

National Planning Framework First Revision (April 2025)

The National Planning Framework (NPF), first 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. It represents an effort to move away from a developer-led system to one informed by the needs and requirements of society up to 2040. The NPF, together with the National Development Plan 2021 (NDP), combine to form Project Ireland 2040, the overarching planning and investment framework for the social, economic and cultural development of Ireland.

On the 8th of 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 Northern and Western Region, in which the Proposed Project is located, is allocated a target of installing an **additional 1,389 MW of onshore wind energy by 2030**[25]**.**

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

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 provision of new renewable energy generation through the Proposed Project 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 the 4th of October 2021 and sets out the major public investment projects identified by the Government which are to play a significant role in addressing the opportunities and challenges faced by Ireland over the coming years such as housing, health, population growth, and most relevant to the Proposed Project, climate change.

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

[25] *National Planning Framework First Revision – April 2025* https://cdn.npf.ie/wp-content/uploads/National-Planning-Framework-First-Revision-April-2025-1.pdf

avoided, e.g., significant reductions in carbon dioxide 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 is 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 ambitious and an explicit driver for the deployment of new renewable generators, e.g., the Proposed Project, and the safeguarding / maintenance of existing assets. It is noted that the reliability of electricity supplies will also be strengthened through investment in the electricity transmission and distribution grid. The focus of investment in regulated network infrastructure is to contribute to a long-term, sustainable and competitive energy future for Ireland.

2.5.2.2 Project Compliance with National Policy

With regard to the above, it is considered that the Proposed Project is in line with and supported by the Revised NPF, and the NDP.

The Revised NPF projects a population increase of approximately one million people by 2040 and therefore recognises the strain and demand this will put on Ireland's energy system. In order to ensure Ireland delivers on its renewable energy and carbon emission reduction targets, the NPF recognises the need for increased renewable energy onto the national grid. This shift from fossil fuels is dependent upon projects such as the Proposed Project which will add c. 31.5MW of renewable energy to Ireland's renewable energy capacity.

The NDP is clear in its priority to reach a low-carbon, climate -resilient society over the lifetime of the NDP. The Proposed Project, if permitted, will provide clean, renewable electricity to the national grid, furthering development objectives of the NDP, namely the target to increase the share of renewable electricity up to 80% by 2030.

This shift from fossil fuels is dependent upon schemes such as the one proposed to generate renewable energy. Given the 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. The addition of 7 no. wind turbines, with an estimated electricity generation capacity of 31.5 MW, will considerably contribute to Ireland's national targets and support the country in meeting its renewable energy and carbon emission reduction goals at the EU level.

2.5.3 Regional Planning Policy

Northern and Western Regional Assembly Regional Spatial & Economic Strategy

The Northern and Western Regional Assembly (NWRA) was established in 2015, the Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region (Galway, Roscommon, Leitrim, Sligo, Donegal, Monaghan, Mayo and Cavan) came into effect in January of 2020. The RSES provides a long-term, strategic development framework for the future physical, economic and social development of

the Northern and Western Region. The RSES seeks to achieve balanced regional development and full implementation of Project Ireland 2040 – the National Planning Framework.

The principal statutory purpose of the RSES is to support the implementation of the Project Ireland 2040 NPF and NDP and the economic policies and objectives of the Government. The RSES aims to build on the region's strengths and potential to become a more prosperous, sustainable, climate resilient and attractive region for the benefit of all its people up to 2040 and beyond.

The North and Western region is characterised by the RSES as having *'a unique natural endowment of ample carbon-neutral, energy supplies'* such as wind. Specifically, the Western Region is stated as being *'particularly rich'* in renewable energy resources dispersed across the region. The RSES acknowledges that the region has a pivotal role in delivering a successful transition to Ireland's proposed low carbon economy with huge potential for growth in renewables. In order to facilitate the growth of renewables within the region, the RSES notes that the NWRA aims to encourage stakeholders, i.e. industry, commercial etc., to be the first to facilitate new opportunities and concentrate on possibilities to further advance renewable energy generation and use.

These strategic aims are captured in Regional Policy Objectives (RPOs) 4.16, 4.17 and 4.18:

- ***RPO 4.16:*** *The NWRA shall co-ordinate the identification of potential renewable energy sites of scale in collaboration with Local Authorities and other stakeholders within 3 years of the adoption of the RSES. The identification of such sites (which may extend to include energy storage solutions) will be based on numerous site selection criteria including environmental matters, and potential grid connections.*
- ***RPO 4.17:*** *To position the region to avail of the emerging global market in renewable energy by stimulating the development and deployment of the most advantageous renewable energy systems, including:*
    - *Stimulating the development and deployment of the most advantageous renewable energy;*
    - *Raising awareness and public understanding of renewable energy and encourage market opportunities for the renewable energy industry to promote the development and growth of renewable energy businesses; and*
    - *Encourage the development of the transmission and distribution grids to facilitate the development of renewable energy projects and the effective utilisation of the energy generated from renewable sources having regard to the future potential of the region over the lifetime of the Strategy and beyond.*
- ***RPO 4.18:*** *Support the development of secure, reliable and safe supplies of renewable energy, to maximise their value, maintain the inward investment, support indigenous industry and create jobs.*

As indicated above, there is a clear policy support within the region to identify and capitalise on emerging opportunities associated with the transition to a decarbonised economy such as renewable energy generation. It should be noted, however, that the existing transmission network within the region is predominantly 110kV with very little higher capacity 220kV and 400kV transmission infrastructure. As such, the RSES endorses the future development of the grid in order to safely facilitate more diverse power flows from surplus regional generation and also to facilitate future growth in electricity demand:

- ***RPO 8.3:*** *The Assembly support the necessary integration of the transmission network requirements to allow linkages with renewable energy proposals at all levels to the electricity transmission grid in a sustainable and timely manner.*
- ***RPO 8.4:*** *That reinforcements and new electricity transmission infrastructure are put in place and their provision is supported, to ensure the energy needs of future population and economic expansion within designated growth areas and across the region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs. Ensure that development minimises impacts on designated areas.*

The RSES is ultimately supportive of the future growth of renewable energy technology in the region and sets a clear precedent to identify and capitalise on those opportunities associated with the transition to renewable energy generation.

2.5.3.2 Project Compliance with Regional Policy

The RSES for the Northern and Western Region states that the region has a crucial role to play in Ireland transition to a low carbon future. It is considered that the provision of the Proposed Project would facilitate this just transition and is particularly in line with RPOs 4.16, 4.17 and 4.18 as outlined above.

In the region, a noticeable trend has emerged to recognise and take advantage of emerging opportunities related to the shift towards a decarbonised economy, particularly in the realm of renewable energy generation and therefore the Proposed Project is considered to be in line with Regional Policy.

2.5.4 Local Policy

The site falls within the administrative area of Mayo County Council and therefore, is subject to the planning policies and objectives set out in the Mayo County Development Plan 2022-2028.

2.5.4.1 Mayo County Development Plan 2022-2028

The Mayo County Development Plan 2022 – 2028 (the MCDP) was adopted by the Elected Members of Mayo County Council (MCC) at the conclusion of the Special Meeting on the 29th of June 2022 and came into effect on the 10th of August 2022. On the 8th of December 2025, MCC made Variation no. 1 to the MCDP (MCDP (as varied)) to align with the NPF Implementation: Housing Growth Requirements set for Co. Mayo, Section 28 Guidelines on NPF Implementation Housing Growth Requirements were published in July 2025 by the Department of Housing, Local Government and Heritage (DHLGH).

On the 28th of April 2026, MCC published Proposed Draft Variation No. 2 of the MCDP (as varied), which seeks to update the Mayo RES. A new Draft Renewable Energy Strategy for County Mayo (April 2026) ('Draft Mayo RES') has been published with the proposed variation documents alongside a Strategic Environmental Assessment Report and Natura Impact Report. Further details of the Draft Mayo RES are provided in **Section 2.5.4.4** below.

The MCDP (as varied) is the statutory county development plan in effect for the County and provides the framework against which all planning applications for development in the county are assessed. The policies and objectives set out within the MCDP (as varied) have maintained strong linkages with the key aims and themes set out within the previous development plan. Climate change is again emphasised as one of the greatest global challenges, with MCC acknowledging that continual action is needed for Mayo to become a low carbon and climate resilient county.

The Planning Reports submitted with the applications contain a detailed planning assessment against all relevant policies and objectives, and the relevant development management standards as set out in the MCDP (as varied).

The importance of climate action is outlined at the beginning of 'Chapter 11: Climate Action and Renewable Energy' of the MCDP (as varied) as it states, *"The overall vision and strategic aims of the county development plan have been influenced by climate action"*. The strategic aim of Chapter 11 is outlined below:

> *"... to transition to a low carbon and climate resilient county, with an emphasis on reduction in energy demand and greenhouse gas emissions, through a combination of effective mitigation and adaptation responses to climate change; in addition to maximising the opportunities to become a national leader in renewable energy generation, whilst increasing the resilience of our Natural and Cultural Capital to climate change by planning and implementing appropriate adaptation measures."*

Furthermore, the MCDP (as varied) includes the following policies in relation to climate action and reducing GHG emissions, which aligns the County with wider European, national and regional objectives:

- **CAP 1:** To support and enable the implementation and achievement of European and national objectives for climate adaptation and mitigation as detailed in the following documents, taking into account other provisions of the Plan (including those relating to land use planning, energy, sustainable mobility, flood risk management and drainage); Climate Action Plan (2019 and any subsequent versions);
    - National Climate Change Adaptation Framework (2018 and any subsequent versions).
    - Relevant provisions of any Sectoral Adaptation Plans prepared to comply with the requirements of the Climate Action and Low Carbon Development Act 2015, including those seeking to contribute towards the National Transition Objective, to pursue, and achieve, the transition to a low carbon, climate resilient and environmentally sustainable economy by the end of the year 2050; and Mayo Council Climate Change Adaptation Strategy (2019-2024 and any subsequent versions).
- **CAP 2:** To support the National Climate Change Strategy and methods of reducing anthropogenic greenhouse gases on an ongoing basis through implementation of supporting objectives in this Plan, particularly those supporting use of alternative and renewable energy sources, sustainable transport, air quality, coastal zone management, flooding and soil erosion and promotion of the retention of, and planting of trees, hedgerows and afforestation, subject to no significant adverse effects on the environment including the integrity of the Natura 2000 network.
- **CAP 3:** To support, promote and facilitate the advancement of climate action at the local and community level in County Mayo and to raise general awareness of issues associated with climate action and climate change mitigation and adaptation.
- **CAP 4:** To support local, regional, national and international initiatives for climate adaptation and mitigation and to limit emissions of greenhouse gases through energy efficiency and the development of renewable energy sources, which make use of all natural resources, including publicly owned lands, in an environmentally acceptable manner.
- **CAP 5:** To support the National Dialogue on Climate Action, in an effort to increase awareness of climate change, behavioural change and adaptation actions and in doing so provide an ongoing platform for planning climate resilience with a focus on personal responsibility at all levels.
- **CAP 6:** To support the transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050, by way of reducing greenhouse gases, increasing renewable energy, and improving energy efficiency and supporting nature- based solutions to climate adaptation and mitigation that provides co benefits.
- **CAP 8:** To cooperate with the Climate Action Regional Office (CARO) in respect of the implementation of existing and future climate change adaption and mitigation strategies.
- **CAP 9:** To support Ireland's renewable energy commitments outlined in national policy by facilitating the development and exploitation of all appropriate renewable energy sources at suitable locations within the county, where such development does not have a negative impact on the surrounding environment (including water quality), landscape, biodiversity or local amenities, so as to provide for further residential and enterprise development within the county.

Section 11.6.5 of the MCDP (as varied) relates to 'Decarbonizing Mayo' and identifies electricity generation as one of the key sectors driving Ireland's transition towards a low-carbon economy. The MCDP (as varied) also sets out the following policies in support of climate change adaptation and renewable energy resources:

- **CAO 1:** To support and advance the provision of renewable energy resources and programmes in line with the Government's National Renewable Energy Action Plan (NREAP), the Governments' Energy White Paper "Irelands Transition to a Low Carbon Energy Future" (2015-2030) and any other relevant policy adopted during the lifetime of this plan.
- **CAO 2:** To support, facilitate and advance the achievement of the goals, objectives and actions of Climate Ready Mayo, the Climate Change Adaptation Strategy for County Mayo.
- **CAO 3:** To carry out a carbon emissions baseline for County Mayo over the lifetime of the plan.

The MCDP (as varied) states that *"Continued development of renewable energy sources in Mayo will help Ireland achieve our national targets. Mayo has an enormous wind resource with the potential to underpin an entire new economy in the county"*. It also establishes a minimum *'realistic deliverable'* wind energy generation target of 600MW for the duration of the MCDP (as varied). The following policies and objectives have been included in support of meeting this target:

- **REP 1**: To support Ireland's renewable energy commitments outlined in national policy by facilitating the development and exploitation of a range of renewable energy sources at suitable locations within the county, where such development does not have a negative impact on the surrounding environment (including water quality), landscape, biodiversity or local amenities to ensure the long-term sustainable growth of the county.
- **REP 4:** To ensure that developers of proposed large-scale renewable energy projects carry out community consultation in accordance with best practice and commence the consultation at the initiation of project planning.
- **REP 7**: To promote the harnessing of wind energy to contribute toward decarbonising County Mayo, including new emerging by-product markets.
- **REO 1**: To co-operate with the Northern and Western Regional Assembly in identifying Strategic Energy Zones as areas suitable for larger, energy generating projects, community and micro energy production, whilst ensuring environmental constraints and a regional landscape strategy are considered.
- **REO 2:** To examine options to ensure that community benefits are derived from renewable energy development in the County.
- **REO 3:** To encourage and facilitate, where possible, the production of energy from established and emerging renewable technologies.
- **REO 6:** To ensure all renewable energy proposal comply with the provisions of the Mayo County Council Renewable Energy Strategy 2011-2022 (or as updated).
- **REO 7:** To commence the review of the Mayo County Renewable Energy Strategy 2011-2022 within one year of adopting this plan and update as required in accordance with future legislative guidelines and consistency with the provisions of RPO 4.16 and RPO 5.2(b) of the RSES, 2020-2032.
- **REO 8:** To encourage the development of wind energy, in accordance with Government policy, and having regard to the Landscape Appraisal of County Mayo and the Wind Energy Development Guidelines (2006) and Mayo Renewable Energy Strategy, or any revisions there of or future guidelines, and ensure consistency with the provisions of RPO 4.16 and RPO 5.2(b) of the RSES (2020-2032).
- **REO 23:** To support and facilitate the achievement of the minimum renewable energy target of 600MW for County Mayo over the plan, and to review/revise this target to ensure consistency with any future renewable energy strategies for the Northern and Western Region.

Section 11.7.6 of the MCDP (as varied) recognizes the need for improvements to the transmission network to *"fully harness the County's renewable energy potential"*. The following policies have been included within the MCDP (as varied) in relation to the grid connection:

- **REP 3**: To actively encourage and support the sustainable development, renewal and maintenance of energy generation infrastructure in order to maintain a secure energy supply, while protecting the landscape, archaeological and built heritage and having regard to the provisions of the Habitats Directive.
- **REP 5**: To promote the use of efficient energy storage systems and infrastructure that supports energy efficiency and renewable energy system optimisation, subject to the proper planning and sustainable development of the area and consideration of environmental and ecological sensitivities.
- **REO 22:** To promote the use of efficient energy storage systems and infrastructure that supports energy efficiency and renewable energy system optimisation, in accordance with proper planning and sustainable development.

The compliance of the Proposed Project against the MCDP (as varied) is demonstrated in **Section 2.5.4** of this Chapter and in **Section 7** and **Section 8** of the accompanying Planning Reports.

2.5.4.2 Mayo County Council Climate Action Plan 2024 -2029

The Mayo County Council Local Authority Climate Action Plan 2024-2029 (Mayo LACAP), published in February 2024, sets out MCC's intentions to create a low carbon and climate resilient County. It also aligns itself with international and national policy regarding climate action, highlighting the Climate Act and Ireland's legally binding target of a 51% reduction in GHG emissions by 2030. The vision and mission of the Mayo LACAP are defined as follows

> *"To be a climate resilient and low carbon organisation that inspires, leads, and facilitates just and ambitious climate action across the county.*
>
> *To transition County Mayo to a Climate Resilient, Biodiversity Rich, Environmentally Sustainable and Climate Neutral Economy and to thereby promote climate justice, and just transition by:*
>
> *1. Reducing Mayo County Council's emissions by 51% by 2030*
>
> *2. Implementing the actions within this Mayo County Council Climate Action Plan*
>
> *3. Advocating, co co-ordinating and facilitating climate action with communities and the various sectors within our County, to aid them in reaching their own emissions reduction targets."*

The Mayo LACAP sets out Strategic Priority 1 Actions in line with contributing to Future proofing the County:

- Action 6 In implementing this County Mayo Climate Action Plan, Mayo County Council will ensure compliance with Mayo County Development Plan 2022-2028 and local area plan objectives and policies relating to environmental management, the protection of statutory Conservation Areas and ensure compliance with specific environmental management measures relating to this plan:
  - Land use plans and projects arising from this Climate Action Plan will be underpinned by Strategic Environmental Assessment, Environmental Impact Assessment, Appropriate Assessment, and Ecological Impact Assessments as relevant.

Strategic Priority 2 Actions consistent with contributing to Future proofing the County include:

- Action 16 Contribute to Energy resilience:
  - Develop Renewable Energy Strategy
  - Action plans developed and implemented

The LACAP also sets out Strategic Priority 2 Actions corresponding to the transition to a Low Carbon Economy:

- Action 10 Develop and expand renewable energy resources:
  - 8-10 MW per annum by 2030

As outlined above, MCC are committed to climate action and climate mitigation through the implementation of the Mayo LACAP. The Mayo LACAP builds on the climate objectives set out in the MCDP (as varied) and MCC's Renewable Energy Strategy (Mayo RES) and is supportive of national policies to reduce GHG emissions and reach carbon neutrality. The Proposed Project is capable of providing the national grid with clean, renewable energy, thus contributing to the decarbonisation of the electricity sector and as such, it is in alignment with the Mayo LACAP.

2.5.4.3 Renewable Energy Strategy for County Mayo 2011-2020

The Renewable Energy Strategy for County Mayo 2011-2020 (Mayo RES) forms part of Volume 4 of the MCDP (as varied). The Mayo RES sets out guidance designed to allow County Mayo to both contribute to meeting the national legally binding targets while also capitalising on those opportunities associated with the generation and harnessing of renewable energy in a sustainable manner.

The vision as outlined in the Mayo RES is as follows:

> *"The renewable energy development vision for County Mayo is to harness the energy and economic potential of County Mayo presented by renewable technologies in order to provide benefits for both local communities and the global environment. In doing so, the elements of the natural, cultural (architectural and archaeological) and landscape heritage that define Mayo for local people and visitors alike will be protected. It is recognised, however, that change is an integral part of cultural heritage and that in order for communities and businesses to thrive Mayo needs new developments. Renewable energy projects will, therefore, be developed in ways that protect the integrity of environmentally designated sites; maximise local and regional benefits; and minimise or avoid negative impacts on the environment and society."*

The Mayo RES includes the following policy objectives addressing Climate Change:

> *"Policy 1 Climate Change*
>
> *It is the policy of the Council to support the National Climate Change Strategy 2007-2012.*
>
> - ***Objective 1.1*** *It is an objective of the Council to assist in achieving national targets for reducing greenhouse gas emissions associated with energy production by encouraging and promoting the reduction in energy consumption and by encouraging renewable energy developments at appropriate locations within the County, having regard to relevant planning guidance and the principles of proper planning and sustainable development and through the implementation of this Strategy.*
> - ***Objective 1.2*** *It is an objective of the Council to encourage renewable energy production from wind, wave, tide, biomass, biofuel, biogas, solar power, tidal, hydro and geothermal sources in the County, particularly at locations set out in the Maps accompanying this Strategy and having regard to principles of proper planning and sustainable development.*
> - ***Objective 1.3*** *It is an objective of the Council to assist in achieving the target that a minimum of 16% of the County's overall energy requirements and 42.5% of the County's electricity requirements will be provided from renewable sources by 2020 by implementing this Strategy."*

The following policy objectives have been included corresponding to renewable energy development within the County:

> *"Policy 2 The Natural and Built Environment*
>
> *It is the policy of the Council to ensure that a balance between the provision of renewable energy developments and the preservation and conservation of the natural and built environment is maintained, subject to compliance with the requirements of the Habitats and Birds Directives.*
>
> - ***Objective 2.1*** *It is an objective of the Council to ensure full compliance with European and National legislation in relation to renewable energy production and protection of the environment.*
> - ***Objective 2.2*** *It is an objective of the Council to follow a sustainable plan led approach to renewable energy development within County Mayo through the implementation of this Strategy, in particular guiding renewable energy developments to preferred locations as set out in Section 6.4 and requiring all renewable energy developments to comply with standards and mitigation measures outlined in Section 6.5.*
> - ***Objective 2.3*** *It is an objective of the Council that all proposed renewable developments will be assessed on the principles of proper planning and sustainable development, ensuring minimal adverse environmental impact to biodiversity, flora and fauna; population and human health; soil; water; air and climatic factors; material assets; cultural heritage; and landscape. Full account shall be taken of the presence and requirement to protect all Natura 2000 sites, natural Heritage Areas, proposed Natural Heritage Areas, the national Park and Nature Reserves. Projects will be subject to Habitats Directive Assessment where considered appropriate.*

- ***Objective 2.4*** *It is an objective of the Council to ensure that renewable energy developments do not interfere with, damage, remove, or impinge on the visual amenity of, existing rights of way, public walking and cycling routes, scenic routes and scenic views, architectural heritage including protected structures and Architectural Conservation Areas, archaeological heritage including recorded monuments, Ballycroy National Park and vulnerable or sensitive landscapes in the County."*

Other objectives within the Mayo RES relevant to the Proposed Project include:

> *"**Policy 4 Community Benefit***
>
> *It is the policy of the Council to require that renewable energy developments are carried out in a manner that promotes economic and social benefits for the community of Mayo as a whole.*
>
> - ***Objective 4.1*** *It is an objective of the Council to ensure that the advantages presented by renewable energy development outweigh the disadvantages for the majority of the community residing in the area of any proposed renewable energy development, and for the wider environment, when assessing planning applications for renewable energy development.*
> - ***Objective 4.3*** *It is an objective of the Council to require developers to incorporate the concept of community benefit into any renewable energy development proposal. Details of the particular form/model of community benefit proposed by the developer shall be submitted with the planning application for agreement by the Council at planning stage."*

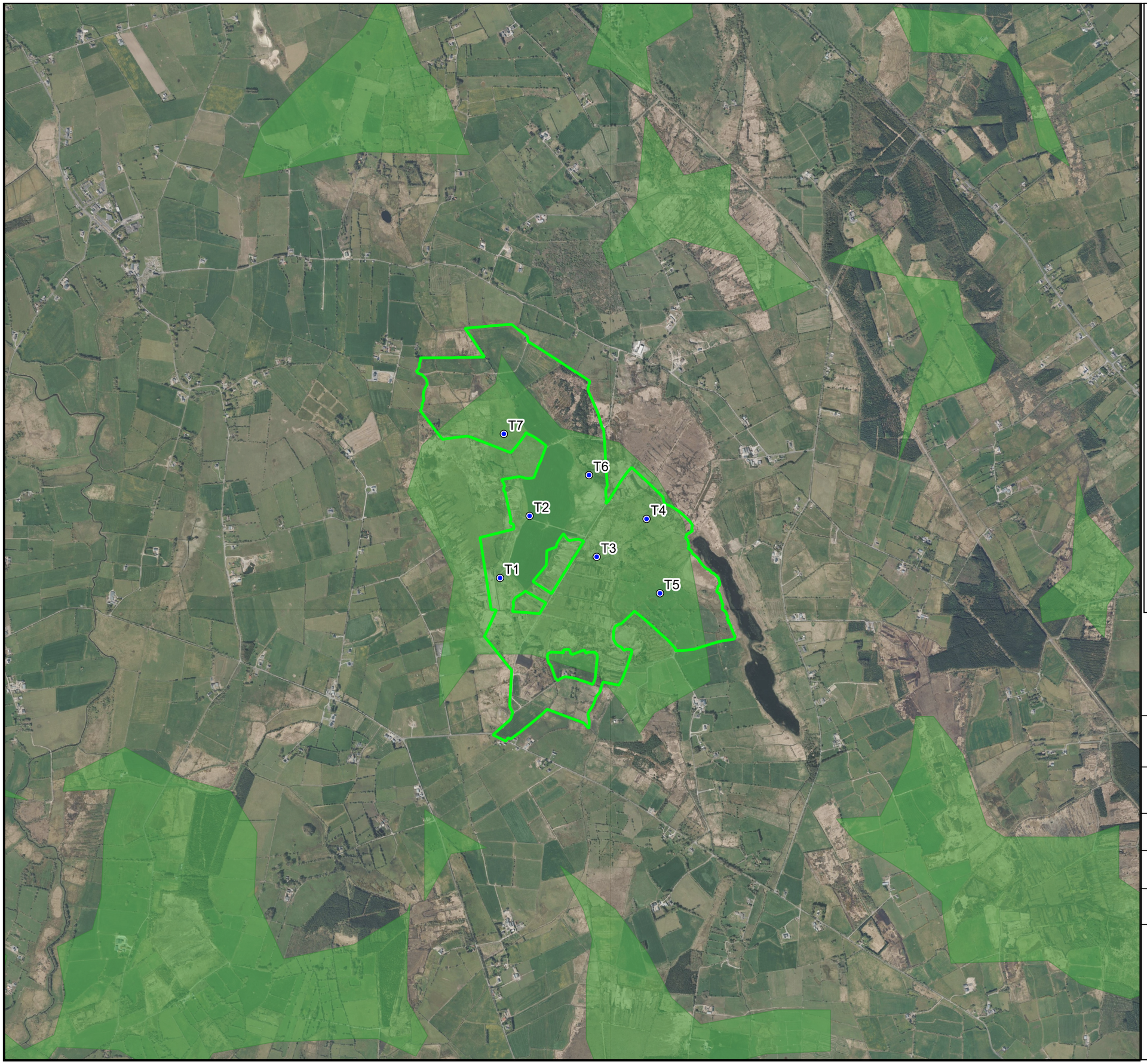
A primary aim of the Mayo RES is to set out one integrated, comprehensive suite of policy objectives for renewable energy development in Mayo that seek to encourage wind energy developments at appropriate locations and to guide the location and design of new proposals. The Mayo RES identifies areas within County Mayo according to a hierarchy from priority areas to areas open for consideration. There are four categories relating to wind energy designations within the Mayo RES, as follows:

- *"**Priority Areas** are areas which have secured planning permission and where on shore wind farms can be developed immediately.*
- ***Tier 1** - Preferred (Large Wind Farms) are areas in which the potential for large wind farms is greatest.*
- ***Tier 1** - Preferred (Cluster of Turbines) are areas identified as being most suitable for smaller clusters of wind turbines (clusters of up to three to five turbines depending on site conditions and visual amenity).*
- ***Tier 2** - Open for Consideration identifies areas which may be considered for wind farms or small clusters of wind turbines but where the visual impact on sensitive or vulnerable landscapes, listed highly scenic routes, scenic routes, scenic viewing points and scenic routes will be the principal consideration. The Tier 2 classification will be reviewed by the Council following a determination by EirGrid of grid infrastructure for the County."*

The Proposed Wind Farm turbines (nos. 1-7) are located entirely within an area designated in the Mayo RES as '*Tier 1-Preferred (Cluster of Turbines)*' for wind energy development, as shown in **Figure 2-3** and **Figure 7-1** of the accompanying Planning Report.

As set out in this EIAR and the accompanying Planning Report, the Proposed Wind Farm has been designed in accordance with the opportunities and sensitivities set out in the Mayo RES and presents an appropriate and suitable opportunity for wind energy development. Having regard to the factors listed above, the Site is in close proximity to the existing energy transmission network and road network, requires minimal vegetation removal and has suitable wind speeds. Furthermore, the Site has few sensitivities constraining wind energy development. The Site is not prone to landslides (as detailed in **Chapter 8** Land, Soils and Geology and **Appendix 8-1** Peat Stability Risk Assessment) and has been designed to avoid neighbouring high value Annex 1 habitat areas (as detailed in **Chapter 6** Biodiversity). The population density is 14.87 persons per square kilometre within the Population Study Area (**Section 5.3.1** of **Chapter 5** Population and Human Health) which is lower than the population density of County Mayo at 24.68 per square kilometre. Notwithstanding that Tier 1 specifies '*clusters of up to three to five turbines depending on site conditions and visual amenity*', it has been demonstrated throughout the EIAR and the accompanying Planning Report that the principle of the Proposed Wind Farm (which

includes 7 no. turbines) at the Site is acceptable. Please refer to **Section 7** and **Section 8** of the accompanying Planning Report for further details. As such it is considered that the Site is in accordance with the aims and objectives of the Mayo RES and represents an opportunity to increase the supply of renewable electricity to the national grid on a suitable site.



Map Legend

- EIAR Study Boundary
- Proposed Turbines

Mayo Renewable Energy Strategy 2022-2028

- Tier 1 - Preferred (Cluster of Turbines)
- Tier 1 - Preferred (Large Wind Farms)
- Tier 2 - Open for Consideration

Drawing Title

Renewable Energy Strategy

Project Title

Proposed Cunlaghfadda Green Energy Project

Drawn By	Checked By
NS	RK
Project No. 220825	Drawing No. Figure 2-3
Scale 1:20,000	Date 2025-11-27

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2.5.4.4 Draft Renewable Energy Strategy for County Mayo (April 2026)

On the 28th of April 2026, MCC published Proposed Draft Variation No. 2 ('the variation') of the MCDP (as varied), which seeks to update the Mayo RES. A new Draft Mayo RES has been published with the proposed variation documents alongside a Strategic Environmental Assessment Report and Natura Impact Report. MCC is conducting consultation on the variation between Tuesday, 28th April 2026 and Tuesday, the 26th of May 2026.

The Draft Mayo RES sets out the guidance to support Mayo's transition to a low-carbon energy County and to become a national leader in renewable energy generation. The Draft Mayo RES was developed in line with EU, national and regional climate targets, the MCDP (as varied) and the Mayo County Council Climate Action Plan 2024-2029 (Mayo LACAP). The compliance of the Proposed Project against the MCDP (as varied) and the Mayo LACAP is demonstrated in **Section 2.5.4** of this Chapter and in Section 7.2 of the Planning Reports.

The vision of the Draft Mayo RES is as follows:

> *"To provide a strategy to maximise Mayo's renewable energy potential and become a national leader in renewable energy and make the transition to becoming a more energy secure, low carbon county in line with energy targets whilst balancing the need for new development with the protection of the environmental, cultural and heritage assets, tourism assets and the established and emerging economic sectors of the county." (emphasis added)*

The strategic aims of the Draft Mayo RES are as follows:

- *To provide an evidence-based strategy founded on understanding the local feasibility and potential for renewable and low carbon technology, predicated upon optimising the County's natural and socio economic, advantages and key assets (including tourism sector), core skills, and nearby research institutes.*
- *To facilitate a consistent approach to renewable energy and to maximise the opportunities for renewable energy development whilst safeguarding the environment and existing residential amenities.*
- *To set out policies and objectives for the main renewable sectors subject to Strategic Environmental Assessment (SEA) and Appropriate Assessment requirements.*
- *To promote research and development, and to foster a supportive environment for innovation and demonstration of new and emerging renewable energy systems and technologies in County Mayo.*
- *To safeguard, where appropriate, areas with potential for renewable energy projects and to guide renewable energy development to preferred locations.*

While the Mayo RES remains the relevant renewable energy strategy in force for County Mayo at the time of submission an evaluation of the Proposed Project against the relevant provisions of the Draft Mayo RES is included in **Section 7** and **Section 8** of the Planning Reports. This assessment demonstrates that the Proposed Project has had regard to the relevant provisions of the Draft Mayo RES.

2.5.4.5 Compliance with Local Policy Objectives

In summary, the MCDP (as varied) and associated Mayo RES fully recognises the importance of tackling climate change through the increased supply of renewable energy. The Mayo LACAP outlines the County's commitment to climate action and the need to meet national objectives regarding a reduction in GHG emissions. MCC seeks to support and facilitate the sustainable provision of a reliable energy supply in the County, with emphasis on increasing energy supplies derived from renewable resources. Furthermore, there is a range of policies in place which support the development of renewable energy.

The layout of the Proposed Wind Farm has been strategically developed, with the Proposed Wind Farm turbines being wholly located in an area classified as 'Tier 1- Preferred (Cluster of Turbines)' for wind

energy development within the Mayo RES, demonstrating the site's appropriateness for wind energy development. Accordingly, the Proposed Project is considered to be compliant with the relevant provisions of the MCDP (as varied) and represents proper planning and sustainable development in the functional area of MCC.

2.5.5 Other Relevant Onshore Wind Energy Planning Policy Publications

The following relevant onshore wind planning policy publications and/or best practice guidelines were considered in the design and assessment of the Proposed Project.

Wind Energy Development Guidelines 2006

In June 2006, the then Department of Environment, Heritage and Local Government (DoEHLG) published the Wind Energy Development Guidelines (the Guidelines (DoEHLG, 2006)) under Section 28 of the Planning Act, which has since been repealed. However, the Guidelines (DoEHLG, 2006) are still force under Section 27(1) of the 2024 Planning Act and are considered National Planning Policy Guidance under Section 27(2) of the 2024 Planning Act. The aim of the Guidelines (DoEHLG, 2006) was to assist the proper planning of wind power projects in appropriate locations around Ireland. The Guidelines (DoEHLG, 2006) also 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 energy development has its own characteristics and defining features, and it is therefore impossible to write specifications for universal use. The Guidelines (DoEHLG, 2006) should be applied practically and do not replace existing national energy, environmental and planning policy. While the Guidelines (DoEHLG, 2006) remain the relevant guidelines in place, at the time of lodgement, decision makers (Planning Authorities and ACP) are not bound to their provisions, and they can (and do) consider updated standards/requirements/specifications in assessing impacts and the proper planning and sustainable development of the area.

Draft Wind Energy Development Guidelines 2019

The Department of Housing, Planning and Local Government (DoHPLG) published the draft Revised Wind Energy Development Guidelines (the Draft Guidelines (DoHPLG, 2019)) in December 2019. A consultation process in relation to the Draft Guidelines (DoHPLG, 2019) concluded on the 19th of February 2020. A further review of the Draft Guidelines (DoHPLG, 2019) is currently underway by the Department of Housing, Local Government and Heritage (DoHLGH) and the DECC, particularly in relation to noise limits. Since the publication of the Draft Guidelines (DoHPLG, 2019), there have been significant changes in national policy regarding renewable energy targets, giving further impetus to the importance of the further review. The Draft Guidelines (DoHPLG, 2019) set out that that the proper planning and sustainable development of areas and regions must be considered 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 Guidelines (DoHPLG, 2019) 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 "preferred draft approach", the Draft Guidelines (DoHPLG, 2019) 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 as part of the whole project.

The design of the Proposed Project has been developed in accordance with the provisions of Draft Guidelines (DoHPLG, 2019) (for example in relation to 4 times the turbine tip height set back distance from third- party sensitive receptors) and the inclusion of a standalone Community Report.

As stated above, the submission period for the Draft Guidelines (DoHPLG, 2019) closed in February 2020. Under the consultation, concerns were raised in relation to a number of themes including but not limited to; noise, visual amenity, set back and shadow flicker. With regards to noise, a number of the received submissions noted that the provisions put forward in the Draft Guidelines (DoHPLG, 2019) were unworkable and could impact the viability of the entire onshore wind sector. In relation to set back distances there was strong criticism with regards to this distance being measured to the curtilage of a property due to this measurement being ambiguous and difficult to implement. Furthermore, questions were raised surrounding the strict measures proposed for shadow flicker; the Draft Guidelines (DoHPLG, 2019) put forward the provision that *'there will be no shadow flicker at any existing nearby dwelling or other relevant existing affected sensitive property'* which may not allow time for the safe shutting down of turbines.

The Government made the commitment in the 'Programme for Government 2025 – Securing Ireland's Future' to prioritise the publication of new Wind Energy Development Guidelines, having regard to international best practice and standards. At time of writing, the Draft Guidelines (DoHPLG, 2019) remain unadopted. The relevant wind energy guidelines for the purposes of Section 27(1) and Section 27(2) of the 2024 Planning Act, remain those published in 2006, the Guidelines (DoEHLG, 2006). Notwithstanding this, however, due to the timelines associated with the planning process for renewable energy projects it is possible that an updated version of the Draft Guidelines (DoHPLG, 2019) may be finalised during the consideration period for the current planning application for the Proposed Project. To this end, on the basis of the details available from the Draft Guidelines (DoHPLG, 2019), it is anticipated that the Proposed Project will be capable of adhering to the relevant noise and shadow flicker standards, please refer to **Chapter 5** and **Chapter 12** for further details. While the final guidelines have not yet been published, it should be noted that Shadow Flicker is entirely controllable and is discussed further in **Chapter 5**. In addition, the Proposed Project maintains a 4 times maximum tip height set back between turbines and sensitive receptors which is currently the recognised standard for visual amenity purposes, as outlined in the Draft Guidelines (DoHPLG, 2019). Furthermore, community consultation has also been undertaken (refer to **Appendix 2-2**).

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 (hereafter referred to as the IWEA Guidelines). The IWEA 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 IWEA 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 IWEA 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 Guidelines the aim was to be complementary to the Guidelines (DoEHLG, 2006).

IWEA Best Practice Principles in Community Engagement and Community Commitment 2013

IWEA extended its guidance with the publication of the *'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 community engagement 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 this document and associated best practice principles 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.

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

In December 2016, the then 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 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 from 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 Code of Practice advises 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.

Further details on the community engagement that has been undertaken as part of the Proposed Project are presented in **Section 2.8** below. A Community Engagement Report has been prepared by the Applicant and is included as **Appendix 2-2** to this Chapter. This report outlines the steps taken by the Applicant to communicate effectively with the local community in respect of the Proposed Project.

Department Circular PL5/2017

On the 3rd of August 2017, the then Department of Housing, Planning and Local Government (DHPLG) issued Circular PL5/2017 to provide an update on the review of the wind energy and renewable policies in development plans, and the advice contained within a previous Departmental Circular PL20-13. Circular PL20-13 advised that local authorities should defer amending their existing Development Plan policies in relation to wind energy and renewable energy generally as part of either the normal cyclical six-yearly review or plan variation processes and should instead operate their existing development plan policies and objectives until the completion of a focused review of the Guidelines (DoEHLG, 2006). The new circular (PL05/217) reconfirms that this continues to be the advice of the Department.

The Circular also set out the four key aspects of a preferred draft approach being developed to address the key aspects of the review of the Guidelines (DoEHLG, 2006 as follows:

- The application of a more stringent noise limit, consistent with World Health Organisation (WHO) noise standards, in tandem with a new robust noise monitoring regime, to ensure compliance with noise standards;
- A visual amenity setback of 4 times the turbine height between a wind turbine and the nearest residential property, subject to a mandatory minimum distance of 500 metres between a wind turbine and the nearest residential property;
- The elimination of shadow flicker; and
- The introduction of new obligations in relation to engagement with local communities by wind farm developers along with the provision of community benefit measures.

Commission for Regulation of Utilities: Grid Connection Policy

The Commission for Regulation of Utilities (CRU) (previously the Commission for Energy Regulation (CER)) launched a new grid connection policy in March 2018 for renewable and other generators, known as ECP-1, which seeks to allow "shovel ready" projects that already have a valid planning permission to connect to the electricity network. The principal objective which guides this decision is to allow those projects to have an opportunity to connect to the network, along with laying the foundations for future,

more regular batches for connection. August 2018 saw the applicants for new connection capacity under ECP-1 published. ECP-2 was launched in June of 2020, which set policy for at least three annual batches of connection offers (ECP 2.1, ECP-2.2, and ECP-2.3). On 4th April 2023 the CRU published its Decision on ECP-2.4, confirming a fourth batch under the ECP-2 policy. The first four ECP-2 application windows (2.1 -2.3 and -2.4) opened for the month of September each year. The application window for the fifth annual batch (ECP-2.5) closed on the 30th of November 2024. The enduring connection policy regime replaces the previous 'Gate' system of grid connection applications. The grid connection application window under ECP-1 was the first time since 2007 that certain renewable energy projects including wind farms had an opportunity to secure a new grid connection offer.

In September 2024, the CRU published its Electricity Connection Policy – Generation and System Services Decision Paper, which sets policy for onshore renewable energy developments connecting to the electricity system. In June 2025, the CRU published its Electricity Connection Policy – Generation & System Service: Pre-engagement and High-level Technical Assessment, which sets out decisions on the pre-application process to facilitate applications. Entry into the ECP-GSS-1 September 2025 batch, to submit a grid application, closed on the 30th of September 2025, for applicants who made a successful pre-application notification.

In November 2025, the CRU published an Information Note (CRU2025182), which sets out an update regarding entrance into the March 2026 batch. Entry into the ECP-GSS-2 March 2026 batch, to submit a grid application, closed on the 31st of March 2026, for applicants who made a successful pre-application notification.

The design of the Proposed Grid Connection has taken account of the *"preferred draft approach"* and accordingly, has been developed with the provisions of the Draft Guidelines (DoHPLG, 2019) in mind. This grid connection policy will allow for the Proposed Grid Connection, once it is permitted, to connect to the electricity networks under the enduring connection policy regime.

Renewable Energy Support Scheme

CAP25 is the Government's plan to give Irish people a cleaner, safer and more sustainable future to halve emissions by 2030 and reach net zero no later than 2050. CAP25 sets out actions across every sector which will ensure we meet our future climate commitments. A key part of the CAP25 is to increase the proportion of renewable electricity to up to 80% by 2030, with a target of 9GW from onshore wind. These measures will be driven by the Renewable Electricity Support Scheme ('RESS') which aims to promote the generation of electricity from renewable sources.

The RESS is an auction-based scheme which invites renewable electricity projects to bid for capacity and receive a guaranteed price for the electricity they generate.

RESS 1 was the first RESS run by the Government of Ireland and concluded in 2020. RESS 2 was run in 2022 and concluded in June 2022. The successful projects in RESS 2, the majority of which are now constructed and operational, represent an increase of nearly 20% in Ireland's current renewable energy generation capacity. RESS 3 concluded in September 2023 and RESS 4 in September 2024. The most recent RESS auction was the RESS 5 auction where submissions closed in September 2025, and results were announced later the same month. It secured its full target of around 1,500 GWh of renewable electricity, delivering over 1,000 MW of additional onshore wind and solar capacity.

While significant challenges remain in meeting climate targets, the RESS represents a decisive step forward. It lays the foundation for a more sustainable and cost-effective renewable electricity market, supporting the growth of the green economy, promoting sustainable employment opportunities, and boosting Ireland's energy security as renewables become increasingly competitive.

The Proposed Project is in accordance with the CAP25 and a grant of permission for the onshore wind energy development will allow for the Proposed Project to participate in the RESS auction and contribute renewable energy generation in achieving Ireland's CAP25 target of 9GW of onshore wind generation by 2030, a target that Ireland is not currently on track to meet, as detailed above in **Section 2.4**.

2.6 Planning History

This section of the EIAR sets out the relevant planning history of the Site, within the Proposed Project planning application boundaries (red line boundary) (**Figure 1-2** in **Chapter 1** Introduction) and, for context, also identifies other wind energy development within the wider area (25km from the Proposed Wind Farm turbines).

2.6.1 Planning Applications within the Proposed Project Application Boundary

A planning search was carried out through the national planning application database and ACP's online planning portal in June 2026 for relevant planning applications submitted within the past 10 years that fall within the red line boundaries of the Proposed Project which are outlined in Table 2-2 below.

Table 2-2 Planning Applications within the Proposed Project Application Boundaries

Planning Authority	Pl. Ref.	Description	Planning Authority Decision
Mayo County Council	22780	Works to refurbish the existing Castlebar-Cloon 110kV overhead line which is approximately 57km long and comprises 252 no. wooden polesets and 40 no. steel angle masts between the existing Castlebar 110kv substation in the townland of Aghalusky, and the existing Cloon 110kv substation in the townland of Cloonascragh, Co. Galway. approximately 20km of the existing circuit is located within the functional area of Galway County Council and approximately 37km in the functional area of Mayo County Council.	Granted by MCC on 18/05/2023
Mayo County Council	2660398	We, Cunlaghfadda Green Energy Limited, intend to apply for a ten-year planning permission for development in the townlands of Knockroe, Cunlaghfadda, Harefield, Cloonbaul and Knockaunakill, County Mayo. The development will comprise the provision of a renewable energy development consisting of the following: i. 7 no. wind turbines with a top of foundation to blade tip height of 160 metres; a rotor blade diameter of 136 metres; and hub height of 92 metres,1 no. meteorological mast with a height of 92 metres and subsequent decommissioning of the wind turbines and meteorological mast following a thirty five-year operational life from the date of full commissioning of the wind turbines; ii. Turbine and meteorological mast foundations and associated temporary and permanent hard-standing areas; iii. All associated underground electrical and communications cabling and subsequent decommissioning of all underground cabling within the site connecting the turbines to a proposed 110kV substation following a thirty-five-year operational life from the date of full commissioning of the wind turbines; iv. 1 no. temporary construction compound; v. Upgrade and widening of existing internal tracks and provision of new permanent and temporary site access tracks and all associated site drainage; vi. Upgrade and temporary road widening works along the L15053 and provision of 1 no. passing bay; vii. 1 no. new temporary site entrance off the L1505 in the townland of Knockroe to accommodate the delivery of abnormal loads and construction phase traffic; viii. 1 no. new permanent site entrance in the townlands of Cunlaghfadda and Cloonbaul; ix. 1 no. borrow pit; x. 10 no. peat and spoil management areas; xi. 2 no. temporary security cabins; xii. Tree felling and vegetation removal; xiii. Biodiversity enhancement	Decision due from MCC on 14/07/2026

		areas; xiv. Site drainage; xv. Site fencing, gates and signage; and xvi. All related site works above and below ground and all ancillary development.	

2.6.2 Wind Energy Developments within 25km of the Proposed Wind Farm Turbines

A planning search was carried out to establish proposed, permitted and operational wind energy developments within 25km of the Proposed Wind Farm turbines. This distance was chosen as it is considered that cumulative impacts would not exist with any development proposed, permitted or operational, greater than 25km from the Proposed Wind Farm turbines, please refer to **Section 2.9.3** for further details.

The search was carried out using the relevant local authority and ACP databases in April 2026 for relevant planning applications. In total, 14 no. applications relating to wind energy developments were identified within 25km of the Proposed Wind Farm turbines, 11 no. of which relate to proposed, permitted or existing multiple turbine wind farm developments and a further 3 no. of which relate to existing or permitted single turbine developments. These are outlined in greater detail in Table 2-3 below.

In addition to this, wind energy developments at pre-planning stage were also considered for completeness. 1 no. pre-planning request submitted to ACP on the 11th of February 2026 was identified, relating to the proposed Lyra Wind Farm in the townlands of Corveagh Upper, Cordarragh South, Teevinish West, Teevinish East, Arderry, Toberrooaun, Tonlegee, and Aille, County Mayo. At the time of writing, publicly available details for the proposed Lyra Wind Farm are limited and the wind turbine locations are not available. However, the boundary of the nearest townland (Aille) is located more than 20km away from the nearest Proposed Wind Farm turbine. Due to the limited information available on the proposed Lyra Wind Farm, it has not been considered further in any cumulative assessments carried out as part of the EIAR.

Table 2-3 Valid Wind Farm Applications within 25km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
Single/Domestic Turbines								
MCC Pl. Ref. 06387	Aghinish Domestic Turbine	Mayo	Len & Doris Jones	Construction of a new 6kW domestic wind turbine on a 9m high mast at the rear of the site of the existing dwelling house. previous reference P04/3338.	Granted by MCC on 28/07/2006	Existing	1	17 km
MCC Pl. Ref. 2560272	Tonregee Single Turbine	Mayo	ART Generation Limited	A renewable energy project in the townlands of Tonregee and Levallyroe, Ballyhaunis, County Mayo. The proposed development will consist of: • Construction of a single wind turbine with an overall ground to blade tip height of 156.5m, comprising rotor diameters of 133m and a hub height of 90m. • Construction of a permanent crane hardstand area and temporary laydown/storage area and turbine foundation. • Upgrade of existing access tracks and construction of new permanent site access tracks. • Development of a site drainage network including sediment control systems. • Construction of a permanent on-site 20kV on-site electrical substation, all associated electrical plant and equipment, security fencing and gates, all associated underground cabling and all ancillary structures and works. • All associated underground electrical and communications cabling connecting the wind turbine to the on-site substation. •	Granted by MCC on 24/11/2025	Permitted	5	21.5km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				Temporary construction compound and temporary site works. • Site signage, landscaping and all ancillary development.				
MCC Pl. Ref. 2360568	Connaught GAA Turbines (Primary purpose of turbines are to provide energy to the Connacht GAA Centre of Excellence. Hence, inclusion in 'Single/ Domestic Turbines')	Mayo	Connacht GAA	Planning permission for the installation of three no. 20 kW wind turbines within the grounds of the existing Connacht GAA Centre of Excellence previously permitted and constructed under Pl. Ref P08/1995. The three turbines will have a tower height of 18m, a blade diameter of 9.8m and a blade tip height of 24m. The installation of the three no. wind turbines will be adjacent to the existing 3G pitch and will include all associated site development works within the grounds of the existing Connacht GAA Centre of Excellence at Connacht GAA Centre of Excellence, Cloonacurry TD., Bekan, Ballyhaunis, Co. Mayo.	Granted by MCC on 04/10/2024	Permitted	3	14.9km
Large Wind Energy Applications								
MCC Pl. Ref. 071569 ACP Case Ref. PL16.226376	Lenanavea Wind Farm	Mayo	Western Power Ltd.	The development will consist of five x 850kW wind turbines (which have up to 55m towers, 3m diameter base and 52m diameter rotor blades), access roads and associated works.	Refused by MCC on 11/10/2007 Appealed and granted by	Existing	5	25.5km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
					ACP on 24/12/2008			
MCC Pl. Ref. 13631 ACP Case Ref. PL16.244055	Magheramore Wind Farm	Mayo	PWWP Developments Ltd.	Proposed wind farm will comprise a total of up to 7 no. wind turbines, with a max overall blade tip height of up to 156.5m, upgrade of existing and provision of new internal access roads including the upgrading of two site access junctions and provision of two new site access junctions, provision of anemometry mast (height up to 100m), peat storage areas, underground electricity connection cabling, temporary construction compound and all ancillary site works. the current proposed development is intended to supersede the wind farm development permitted under P09/664.	Granted by MCC on 08/10/2014 Appealed and granted by ACP on 16/01/2017	Existing	6 (ACP conditioned the omission of 1 no. turbine)	11 km
MCC Pl. Ref. 00/1954 & 062476	Mace Upper Wind Farm	Mayo	Noel Walsh & Joan Fallon	Construct wind farm consisting of three 660kW turbines, single storey control building, access road and electrical connections to the E.S.B. sub-station.	Granted by MCC on 07/01/2002	Existing	3	7.5 km
MCC Pl. Ref. 13633 ACP Case Ref. PL16.244034	Cloontooa Wind Farm	Mayo	PWWP Developments Ltd.	10 year permission for wind farm comprising of the provision of a total of up to 6 no. wind turbines, with a max overall blade tip height of up to 156.5m, upgrade of existing and provision of new internal access roads including the upgrading of site access junctions, provision of anemometry	Granted by MCC on 08/10/2014 Appealed and granted by	Existing	6	9 km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
				mast (height up to 100m) peat storage area, an electricity sub-station with control building and associated equipment, underground electricity connection cabling, temporary construction compound and all ancillary site works. the current proposed development is intended to supersede the wind farm permitted under P09/663.	ACP on 16/01/2017			
MCC Pl. Ref. 13617 ACP Case Ref. PL16.244033	Ballykinava Wind Farm	Mayo	PWWP Developments Ltd.	10 year planning permission for a wind farm development. wind farm comprises of a total of 7 wind turbines, with a maximum overall blade tip height of up to 156.5m, upgrade of existing and provision of new internal access roads including the upgrading of site access junction and provision of a new site access junction, provision of anemometry mast up to 100m, peat disposal areas, underground electricity connection cabling, temporary construction compound and all ancillary site works.	Granted by MCC on 08/10/2014 Appealed and granted by ACP on 16/01/2017	Existing	6 (1 no. turbine not built)	10.1 km
MCC Pl. Ref. 972237	Raheen Barr Wind Farm	Mayo	Ecopower Limited	Construct 22 wind turbines (660kW), access roads, substation and ancillary site works.	Granted by MCC on 08/10/1998	Existing	22	23.4km
MCC Pl. Ref. 981672	Cuillalea Wind Farm	Mayo	Compower Ltd.	Construct windfarm consisting of 4 turbines and sub-station.	Granted by MCC on 15/11/1999	Existing	4	10.5km
MCC Pl. Ref. 073371	Cuillalea Wind Farm Extension	Mayo	Cuillalea Wind Farm Ltd.	Construct an extension to the existing windfarm to consist of two additional wind turbines including all ancillary site works	Granted by MCC on 09/10/2008	Existing	2	11km

Pl. Ref	Wind Farm	County	Applicant	Description	Decision	Status	No. of Turbines	Approx. Distance to Nearest Proposed Wind Farm Turbine (km)
MCC Pl. Ref. 05848	Derrynadivva Wind Farm	Mayo	Ecopower Developments Ltd.	Construct 10 no. wind turbines, up to 44m hub height and up to 26m blade length, access roads, control building and ancillary site works	Granted by MCC on 03/02/2006	Existing	10	23.7 km
MCC Pl. Ref. 12635	Derrynadivva Wind Farm Extension	Mayo	Ecopower Developments Ltd.	Erect 4 no. wind turbines, overall height up to 126.6 metres, access roads, control building and ancillary site works	Granted by MCC on 06/08/2013	Existing	3 (1 no. turbine not built or has since been decommissioned)	23.7km
ACP Case Ref. PAX07.323699	Shancloon Wind Farm	Galway	RWE Renewables Ireland Limited	11 no. turbine wind farm and associated infrastructure	N/A	Proposed	11	22.3km
Large Wind Energy Pre-Planning Requests								
ACP: PCX16.324067	Lyra Wind Farm	Mayo	Lyra Renewable Energy Limited	The proposed development consists of 13 wind turbines and associated infrastructure.	N/A	Pre-Planning Request	13	>20km

2.7 Scoping and Consultations

2.7.1 Scoping

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 an Environmental Impact Assessment (EIA). This process is conducted by contacting 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 EIAR preparation, when alterations are still easily incorporated into the design. In this way scoping not only informs the content and scope of the EIAR, but it also provides a feedback mechanism for the proposal design itself.

As part of the constraints mapping process, which is detailed in **Chapter 3** of this EIAR, telecommunications operators, were contacted in July 2022 (and again in November 2022, April/May/July 2023 and September 2025) in order to determine the presence of telecommunications links or aviation assets traversing or located in close proximity to the Proposed Wind Farm. Table 2-6 below represents the latest scoping response received from all rounds of telecom scoping undertaken.

Following this initial exercise, an EIAR scoping document, providing details of the Proposed Project, was prepared by MKO and circulated in May 2023. The scoping document provided details of the Proposed Project and set out the scope of work for the EIAR. Consultees were invited to contribute to the EIAR by suggesting baseline data, survey techniques and potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR.

A revised scoping exercise was carried out in February 2026 due to time elapsed from when previous scoping was carried out, updates in local and national policy and legislation, updates in relevant EIAR guidance, changes in the environmental baseline and refinement of the Proposed Project layout and design. Consultees were invited to contribute again to the EIAR, following these changes.

2.7.2 Scoping Responses

The bodies engaged with at scoping stage are set out below in Table 2-4. Further to this, responses received from the scoping document circulated are set out in Table 2-6 below. Copies of all scoping responses received are included in **Appendix 2-1** of this EIAR. If further responses are received, the comments of the consultees will be considered, where applicable, in the construction, operation and decommissioning of the Proposed Project in the event of a grant of planning permission. The recommendations of the consultees have informed the scope of the assessments undertaken and the contents of the EIAR.

Table 2-4 Scoping List

Consultee	May 2023	February 2026
	Initial Scoping	Updated Scoping
An Taisce	26th May 2023	No response received
Air Nav Ireland	Not contacted in 2023	No response received
Bat Conservation Ireland	No response received	No response received
BirdWatch Ireland	No response received	No response received
Butterfly Conservation Ireland	No response received	No response received
Coimisiún na Meán (replaced the Broadcasting Authority of Ireland)	No response received	Response received 23rd February 2026

Consultee	May 2023	February 2026
	Initial Scoping	Updated Scoping
Commission for Regulation of Utilities	No response received	No response received
Department of Agriculture, Food and the Marine	4th July 2023	Response received 16th February 2026
Department of Defence	4th of July 2023	Response received 24th February 2026
Department of Housing, Local Government and Heritage	No response received	Response Received 2nd February 2026
Department of the Environment, Climate and Communications	No response received	Response received the 24th of February 2026
Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media	No response received	No response received
Department of Transport	4th July 2023	Response received the 5th of March 2026
EirGrid	No response received	No response received
Environmental Protection Agency	No response received	No response received
ESB	No response received	Response received the 16th of March 2026
Failte Ireland	7th June 2023	Response received 25th February 2026
Mayo Gaeltacht- Údarás na Gaeltachta	No response received	No response received
Gas Networks Ireland	Shapefiles issued by GNI quarterly as part of an up-to-date scoping exercise.	Shapefiles issued by GNI quarterly as part of an up-to-date scoping exercise.
Geological Survey of Ireland	4th July 2023	Response received 5th March 2026
Golden Eagle Trust	No response received	No response received
Health Service Executive	No response received	Response received the 10th of March 2026
HSE Public Health HSE West	15th June 2023	9th of March 2026
Iarnród Éireann	30th May 2023	No response received
Inland Fisheries Ireland	23rd June 2023	No response received
Ireland West Airport	No response received	Response received 17th February 2026
Irish Aviation Authority	8th of June 2023	Response received 11th February 2026
Irish Peatland Conservation Council	No response received	No response received
Irish Raptor Study Group	No response received	No response received
Uisce Éireann	23rd June 2023	Response received 10th March 2026
Irish Wildlife Trust	No response received	No response received
Mayo County Council- Environment, Roads, Heritage	No response received	No response received
Ireland West Airport	No response received	Response received 17th February 2026
Met Eireann	No response received	No response received
National Monuments Service	No response received	Response received 2nd April 2026
Northern and Western Regional Assembly	No response received	No response received

Consultee	May 2023	February 2026
	Initial Scoping	Updated Scoping
NPWS	No response received	Response received 9th March 2026
Office of Public Works	4th June 2023	Response received 29th of April 2026
The Heritage Council	No response received	No response received
Transport Infrastructure Ireland	17th June 2023	Response received 16th February 2026
Waterways Ireland	29th May 2023	No response received
West Region Local Authority Waters Programme	No response received	No response received

Table 2-5 Telecommunication Scoping List

Telecommunications and Aviation Scoping		
No.	Consultee	Date of Response
1	2RN	30th September 2025
2	3 Mobile	30th September 2025
3	AirNav	No Response Received
4	AirWave	30th September 2025
5	AP Wireless	7th October 2025
6	BAI	30th September 2025
7	BBNet	No Response Received
8	Cellnex	20th November 2025
9	Comreg	29th May 2023
10	Córas Iompair Éireann	No Response Received
11	Defence Forces	No Response Received
12	Dense Air	20th April 2023
13	Department of Defence -Property Management	16th October 2025
14	EIR	17th October 2025
15	ENET	18th November 2025
16	ESB	24th October 2025
17	Fastcom	No Response Received
18	Hibernian Towers	20th April 2023
19	IAA	No Response Received
20	Imagine Network	21st June 2022
21	Irish Rail	1st October 2025
22	Irish Water	1st October 2025
23	Ivertec	28th November 2022
24	JFK Communications	17th April 2023
25	NBI Infrastructure	18th November 2025
26	Openair	16th March
27	Phoenix	No Response Received

28	Ripple & Viatel	17th April 2023
29	Tetra	29th October 2022
30	Tetra Ireland	17th April 2023
31	Towercom	2nd October 2026
32	Virgin Media	28th November 2022
33	Vodafone	20th July 2023
34	Western Broadband Network	No Response Received
35	Westnet	17th April 2023
36	Whizzy	11th August 2022

Table 2-6 Scoping List and Responses

Consultee	Date of Response	Response Summary Initial Scoping (2023)	Response Summary Updated Scoping (2026)	Addressed in Chapter
An Taisce	26th May 2023	Stated that they have received our query but do not have the capacity to respond.	No additional response was received.	N/A
Coimisiún na Meán	23rd February 2026	No comments received	Stated that Coimisiún na Meán does not perform an in-depth analysis of the effect of wind turbines or electrical sub stations on FM networks. However, we are not aware of any issues from existing windfarms or electrical sub stations into existing FM networks. Also, the proposed substation is not located close to any existing or planned FM transmission sites.	N/A
Department of Agriculture	4th July 2023 16th February 2026	Stated that if the development involves cutting or removing trees, the developer must first obtain a Felling Licence and comply with forestry and environmental laws. The Department will assess environmental impacts, consult with relevant authorities, and allow public submissions before making a decision. Any planning applications to local authorities or An Bord Pleanála must include environmental assessments of tree felling and ensure consistency with licence applications. Replanting or afforestation may also be required to support sustainable forest management.	No additional comments were made.	Addressed in Chapter 6
Department of Transport	4th July 2023 5th of March 2026	State that the proposed wind farm at Cunlaghfadda and its grid connection cables could impact the environment and public road network, particularly if cables are installed within regional or local roads.	No additional comments were made.	Addressed in Chapter 15

Consultee	Date of Response	Response Summary Initial Scoping (2023)	Response Summary Updated Scoping (2026)	Addressed in Chapter
		The Department emphasises the need to assess alternative cable routes, minimise disruption to road structure and maintenance, and protect road safety and future utility use. It recommends conditions requiring local authority approval of cable routes, compliance with roadwork standards, accurate recording of cable locations, avoiding bridges and jointing bays, minimising trenching, and ensuring clear ownership and communication arrangements to reduce impacts on roads and infrastructure.		
Department of Defence	4th of July 2023 24th February 2026	Stated that its comments on the proposed Cunlaghfadda wind farm are preliminary and non-binding, and that final planning decisions rest with planning authorities or An Bord Pleanála. Based on advice from the Irish Air Corps, all turbines must have appropriate obstacle lighting visible day and night, including infrared capability for night vision systems. The Department also notes the site is close to critical Air Corps flight routes, including the N17 and N84, which may raise aviation safety concerns. Further comments may be made if a formal planning application is submitted.	No additional comments were made	Addressed in Chapter 15
Department of Housing, Local Government and Heritage	9th of March 2026	No comments made	The Development Applications Unit provided feedback on Active raised bog (7110) and Degraded raised bog still capable of regeneration (7120), Species-rich grasslands and potential for indirect hydrological impacts on areas of high bog and ctover bog.	Addressed in Chapter 6, 9

Consultee	Date of Response	Response Summary Initial Scoping (2023)	Response Summary Updated Scoping (2026)	Addressed in Chapter
Department of Housing, Local Government and Heritage – National Monuments Service	2nd of April 2026	No comments made	The Development Applications Unit reviewed the EIA scoping request for the proposed Cunlaghfadda Wind Farm and found that insufficient detail was provided to fully assess archaeological impacts but welcomed the inclusion of an Archaeological Impact Assessment (AIA). They recommend that a comprehensive AIA be carried out early in the design process, covering all affected areas and including surveys, geophysical testing, and potential excavation, to assess both direct and indirect impacts on known and potential archaeological features. The assessment must inform the overall EIAR, include mitigation measures for all project stages (including decommissioning), and pay particular attention to the protection and setting of nearby recorded monuments, in line with national policy favouring preservation in situ.	Addressed in Chapter 14
ESB	16th of March 2026	No comments received.	No impacts anticipated on ESB network	Addressed in Chapter 15
Fáilte Ireland	7th June 2023 25th February 2026	Stated how tourism should be considered in Environmental Impact Assessment Reports (EIAR). It emphasises that tourism is a major part of Ireland's economy and depends heavily on environmental quality, scenic landscapes, heritage, and natural resources. The guidelines explain that developments involving tourism, or those that may affect tourism, must assess	No additional comments were made	Addressed in Chapter 5

Consultee	Date of Response	Response Summary Initial Scoping (2023)	Response Summary Updated Scoping (2026)	Addressed in Chapter
		environmental impacts such as effects on landscape, biodiversity, traffic, cultural heritage, and local communities. EIARs must be prepared by qualified experts and include project descriptions, alternatives, baseline conditions, impact assessments, and mitigation measures. The aim is to ensure developments protect tourism assets, minimise environmental harm, and support sustainable tourism in line with EU and Irish environmental legislation.		
Department of Climate, Energy and the Environment (on behalf of Geological Survey of Ireland)	4th July 2023 5th of March 2026	Stated that its publicly available geological and groundwater datasets should be used to inform the EIAR and planning process for the proposed Cunlaghfadda Green Energy Project. While not expressing support or objection, it highlights the importance of considering geoheritage sites, groundwater protection (including a regionally important karstified aquifer underlying the site), geological mapping, geohazards such as landslides and flooding, natural resources, and baseline soil and water geochemistry data (Tellus programme). The data is intended as baseline scientific information to support site-specific assessments and sustainable development decisions.	**Geoheritage** - Our records show that there are no County Geological Sites (CGS) in the vicinity of the Proposed Project. **Groundwater** - Potential for impact on groundwater resources as the Site is underlain by a Regionally Important Karstified (conduit) Aquifer with areas of Extreme and High groundwater vulnerability. **Geohazards** – the GSI recommend that geohazards and particularly flooding be taken into consideration, especially when developing areas where these risks are prevalent, and encourage the use of GSI data when doing so.	Addressed in Chapter 8 and 9
HSE Public Health/ HSE West	15th June 2023 9th March 2026	Stated that that wind energy is an important part of Ireland's climate strategy, and current scientific evidence does not consistently show adverse health effects from wind turbines, though proper setback	Stated that environmental health considerations for the proposed Cunlaghfadda wind farm in County Mayo. They identified potential impacts	Addressed in Chapter 5

Consultee	Date of Response	Response Summary Initial Scoping (2023)	Response Summary Updated Scoping (2026)	Addressed in Chapter
		distances and community engagement are recommended. The HSE advises that Environmental Impact Assessments should consider potential public health impacts such as noise, shadow flicker, effects on amenities, recreation, tourism, community identity, cultural landscapes, and construction-related risks like water contamination and waste management. It also highlights the potential positive health benefits of wind energy, including reduced air pollution and long-term improvements from addressing climate change.	during construction and operation, including noise, shadow flicker, water quality, waste management, drainage, and possible disruption to local amenities and residents. Their report emphasises the need for proper mitigation measures, compliance with environmental health standards, and ongoing monitoring to protect public health and minimise negative effects on the surrounding community and environment.	
IAA	8th of June 2023 12th February 2026	Stated that in the event of planning consent being granted, the applicant should be conditioned to contact the Irish Aviation Authority to: agree an aeronautical obstacle warning light scheme for the wind turbine development, provide as-constructed coordinates in WGS84 format together with ground and tip height elevations at each wind turbine location and notify the Authority of intention to commence crane operations with at least 30 days prior notification of their erection.	Requested turbine coordinates be issued and further consultation with Ireland West Airport Knock and Air Nav Ireland.	Addressed in Chapter 15
Inland Fisheries Ireland	23rd June 2023	States that the proposed Cunlaghfadda wind farm is located within sensitive river catchments, including the Meander and Robe Rivers, which support important salmon and trout habitats and are part of protected conservation areas. It stresses that the Environmental Impact Assessment must examine potential impacts on water	No additional response received.	Addressed in Chapter 6, 9

Consultee	Date of Response	Response Summary Initial Scoping (2023)	Response Summary Updated Scoping (2026)	Addressed in Chapter
		quality, aquatic habitats, hydrology, groundwater, and fish movement. The agency recommends detailed ecological surveys, invasive species management, water quality monitoring, protective buffer zones, careful design of watercourse crossings, and strict construction controls to prevent pollution or habitat damage. It emphasises protecting fisheries, maintaining ecological status, and ensuring the development does not harm aquatic ecosystems.		
Irish Rail	30th May 2023	States that they seek further contact prior to submission should crossing of the Irish Rail network be required.	No additional comments were made as part of general scoping carried out in 2026, see Table 2-7 below in relation to telecommunications scoping.	Addressed in Chapter 3, 15
Uisce Éireann	23rd June 2023 10th March 2026	States that they seek further contact prior to submission.	No additional comments were made.	Addressed in Chapter 9
Office of Public Works	4th June 2023 29th of April 2026	States that any new or modified bridges or culverts associated with the Cunlaghfadda wind farm, including those for access roads or grid connections, require formal consent under Section 50 of the Arterial Drainage Act 1945, regardless of planning permission. Structures must be designed to safely handle a 1-in-100-year flood event plus a 20% climate change allowance without increasing flood risk or altering watercourse flow. The OPW also recommends carrying out a Flood Risk Assessment in line with national guidelines to evaluate and mitigate potential impacts on watercourses, infrastructure, and	No additional comments were made.	Addressed in Chapter and Chapter 9

Consultee	Date of Response	Response Summary Initial Scoping (2023)	Response Summary Updated Scoping (2026)	Addressed in Chapter
		surrounding areas, ensuring the development does not increase flooding risks.		
Transport Infrastructure Ireland	17th June 2023 16th February 2026	TII states that, as a statutory consultee under the Planning Acts, the planning applications and Environmental Impact Assessment Reports (EIARs) affecting the national road network, in line with official policy including the Section 28 Spatial Planning and National Roads Guidelines and national strategies such as the National Planning Framework and National Development Plan. TII states that developers are expected to consult with local authorities, TII, and relevant contractors regarding road schemes, potential impacts on national roads and junctions, haul routes, abnormal loads, noise, air quality, visual impacts, and traffic management. TII states that EIARs should follow TII publications and guidelines, consider cumulative and site-specific effects, and ensure any temporary works or cabling proposals safeguard road safety and infrastructure, with costs borne by the developer. TII states that it emphasizes maintaining the strategic capacity, safety, and investment of the national road network, notes that cable routing along these roads should generally be avoided and confirms that any works affecting TII infrastructure require prior consultation and approvals.	No additional comments were made.	Addressed in Chapter 15

Consultee	Date of Response	Response Summary Initial Scoping (2023)	Response Summary Updated Scoping (2026)	Addressed in Chapter
Waterways Ireland	29th May 2023	Stated that Cunlaghfadda wind farm is not within any Zone of Influence of our waterways so they will not be commenting.	No additional comments were made.	Addressed in Chapter 6, 9

Table 2-7 Telecommunications Scoping List and Responses

Telecommunications and Aviation Scoping				
No.	Consultee	Date of Response	Response Summary	Addressed in
1	2RN	30th September 2025	2RN Protocol Signed	Addressed in Chapter 15
2	3 Mobile	30th September 2025	Stated that there will be no impact.	N/A
3	AirWave	30th September 2025	Stated that there will be no impact.	N/A
4	AP Wireless	7th October 2025	Stated that there will be no impact.	N/A
5	BAI	30th September 2025	Stated that there will be no impact.	N/A
6	Cellnex	20th November 2025	Stated that there will be no impact.	N/A
7	Comreg	29th May 2023	Stated that they communicated with operators to highlight any setback requirements.	Addressed in Chapter 15
8	Dense Air	20th April 2023	Stated that there will be no impact.	N/A
9	Department of Defence - Property Management	16th October 2025	Stated that there will be no impact.	N/A
10	EIR	17th October 2025	Stated that there will be no impact.	N/A
11	ENET	18th November 2025	Stated that there will be no impact.	N/A
12	ESB	24th October 2025	Stated that there will be no impact.	N/A
13	Hibernian Towers	20th April 2023	Stated that there will be no impact.	N/A
14	Imagine Network	21st June 2022	Stated that there will be no impact.	N/A

15	Irish Rail	29th May 2023	Stated that they have radio transmissions nearby to the site.	Addressed in Chapter 15
16	Irish Water	1st October 2025	Stated that there will be no impact.	N/A
17	Ivertec	28th November 2022	Stated that there will be no impact.	N/A
18	JFK Communications	17th April 2023	Stated that there will be no impact.	N/A
19	NBI Infrastructure	18th November 2025	Stated that there will be no impact.	N/A
20	Openair	16th March	Stated that there will be no impact.	N/A
21	Ripple & Viatel	17th April 2023	Stated that there will be no impact.	N/A
22	Tetra	29th October 2022	Stated that there will be no impact.	N/A
23	Tetra Ireland	17th April 2023	Stated that there will be no impact.	N/A
24	Towercom	2nd October 2026	Stated that there will be no impact.	N/A
25	Virgin Media	28th November 2022	Stated that there will be no impact.	N/A
26	Vodafone	20th July 2023	Stated that there will be no impact.	N/A
27	Westnet	17th April 2023	Stated that they do have a telecoms link in the vicinity of the site, however it is approximately 2km to the East of the Site.	Addressed in Chapter 15

2.7.3 Other Consultations

2.7.3.1 Pre-Planning Meetings

2.7.3.1.1 *Mayo County Council*

First Pre-Application Meeting (Section 247)

Members of the project team and the Applicant met with representatives of MCC in accordance with Section 247 of the Planning Act via Microsoft (MS) Teams on the 16th of January 2024. Those in attendance were:

On behalf of MCC:

- John McMyler
- Martin McNamara
- Patrick O'Sullivan

On behalf of Agent and Applicant:

- John O'Connor – Greensource
- Robert Brokert – Greensource
- Alan Clancy – MKO
- Grainne Griffin – MKO
- Jade Power – MKO
- Karen Mulryan – MKO
- Natalia Stolarska – MKO

The project team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- Introduction to the Proposed Project, the Applicant and project team
- Overview of the Site location and site selection process
- Proposed Wind Farm design, Proposed Grid Connection design, proposed haul route
- Site constraints, environmental Designations, habitats
- Landscape and visual impact assessment
- Surveys completed to date
- Planning policy context
- Scoping, pre-application consultation & public consultation
- Environmental Impact Assessment Report
- Proposed Project timeline

Following this presentation, there was further discussion held between the project team and the representatives of MCC. Matters discussed included:

- Proposed Grid Connection route
- Site constraints
- Archaeology
- Peat stability
- Landscape and Visual
- Ecology
- Planning policy context
- Scoping and community consultation
- Planning application contents

Second Meeting

Members of the project team and the Applicant met with representatives of MCC in accordance with Section 247 of the Planning Act via MS Teams on the 2nd of March 2026. Those in attendance were:

On behalf of MCC:

- Brendan Munnelly

On behalf of Agent and Applicant:

- Imelda Barry – Cunlaghfadda Green Energy Ltd.
- John O'Connor – Cunlaghfadda Green Energy Ltd.
- Robert Brokert – Cunlaghfadda Green Energy Ltd.
- Francesca Rowson – MKO
- Mike Amiel Mekell – MKO
- Órla Murphy – MKO
- Natalia Stolarska – MKO
- Joye Atkinson – MKO
- Kate O'Donnell – MKO
- Nessa Lee – MKO

The project team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- Introduction, Agenda, project progress, background, policy and consultation
- Designated sites and Biodiversity
- Ornithology
- Water
- Peat stability
- Noise and shadow flicker
- Landscape and Visual Impact Assessment
- Other material assets, transport delivery route and temporary construction entrance
- Planning application documents and drawings
- Project timeline and conclusion

Following this presentation, there was further discussion held between the project team and the representatives of MCC. Matters discussed included:

- Renewable Energy Strategy for County Mayo
- Works to the public road
- Landowner letters of consent
- Landscape and visual impacts
- Residential amenity
- RED III

2.7.3.1.2 *An Coimisiún Pleanála*

The Applicant engaged with ACP, then An Bord Pleanála under the provisions of Section 182E of the Planning Act, as to whether the Proposed Grid Connection would meet the thresholds of the Seventh Schedule of the Planning Act. The Applicant opened consultations with ACP in February 2024 in relation to a Proposed Grid Connection which comprises a an onsite 110kV substation which will break into the existing Castlebar to Cloon 110kV overhead line that traverses the site via a loop in loop out connection.

An SID meeting under the provisions of Section 182E of the Planning Act was held with ACP on the 9th of May 2024. Those in attendance were:

On behalf of ACP:

- Ellen Moss
- Karen Hamilton
- Paul Caprani

On behalf of Agent and Applicant:

- John O'Connor – Cunlaghfadda Green Energy Ltd.
- Robert Brokert – Cunlaghfadda Green Energy Ltd.
- Alan Clancy – MKO
- Grainne Griffin – MKO
- Jade Power – MKO
- Natalia Stolarska – MKO
- Robert Kennedy – MKO

The project team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- Introduction to the Proposed Project, the Applicant and the project team
- Site location
- Proposed Grid Connection infrastructure
- Planning policy context
- Section 182A criteria
- Environmental designations
- Environmental Impact Assessment Report
- Scoping, pre-application consultation & public consultation
- Proposed Project timeline

Following this presentation, there was further discussion held between the project team and the representatives of ACP. Matters discussed included:

- Planning application for the Proposed Wind Farm
- County Development Plan
- Website
- Proposed Project timeline
- Environmental Impact Assessment Report
- Engagement with the NPWS
- Strategic Infrastructure Development

SID Determination

A letter received from ACP dated the 4th of July 2024 stated that under Section 182E, it is the opinion of ACP that the Proposed Grid Connection falls within the scope of the Section 182A of the Planning Act. This confirmed that the Proposed Grid Connection constitutes SID and therefore the planning application should be made directly to ACP.

2.8 Community Consultation

The community consultation carried out for the Proposed Project was based around engaging with the local community 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.

To inform local residents about the Proposed Project, a project Community Liaison Officer (CLO) was appointed, and an introductory information pack was posted in March2026 to all householders within a c. 2km radius of the Proposed Project. All the information sent to the local community was also made

available for public viewing on the project information website. The information contained in the pack and distributed to each household consisted of the following:

- A company brochure, which provided an overview of the Applicant, the Proposed Project and some general information about wind energy;
- A site location map;
- Dedicated contact details (name, phone and email) for the CLO in relation to the project, along with a web address for the dedicated project website.

Following the initial notification of the proposal to the local community, the CLO liaised with interested parties in helping them to understand the proposal and respond to any queries or concerns raised. Door-to-door visits to all households within a c. 1km radius of the Proposed Project were held on the 10th of March 2026. Further consultations were organised, with the CLO attending in-person meetings with individuals to answer queries relating to the Proposed Project. A letter was posted to all households within a c. 1km radius of the Proposed Project, inviting them to a community clinic, which was held on the 8th of April 2026 in McWilliam Park Hotel, Claremorris, County Mayo.

The consultation process has been an extremely valuable exercise and has provided a detailed, and enhanced understanding of the key issues and concerns of the local community. There is currently on-going consultation with the local community, and it is the intention of the Applicant to continue with the consultation for the entire lifespan of the Proposed Project.

The development of the Proposed Project will provide an enduring economic benefit to the communities surrounding the Proposed Project, through the community benefit package for residents and community groups, employment during the construction and operation of the Proposed Project and through the annual rates payable to the Local Authority.

Please refer to the Community Engagement Report at **Appendix 2-2** of the EIAR for further details.

2.9 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 a proposed development or project. The factors to be considered in relation to cumulative effects include population and human health, biodiversity, land, soil, water, air quality, climate, material assets, landscape, cultural heritage, and major accidents / vulnerability to natural disasters, 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.

2.9.1 Methodology for the Cumulative Assessment of Projects

The potential cumulative impact of the Proposed Project and combined with the potential impact of other projects or plans has been carried out with the purpose of identifying what influence the Proposed Project will have on the surrounding environment when considered collectively with proposed and existing projects, projects pending a decision from the planning authority, projects in the public domain such as Strategic Infrastructure Development (SID) at pre-consultation with ACP, and land-uses in the vicinity of the Site location.

The cumulative impact assessment of projects has three principle aims:

1. *To establish the range and nature of existing and approved projects within the cumulative impact study area of the Proposed Project.*
2. *To summarise the relevant projects which have a potential to create cumulative impacts.*
3. *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 nor indirectly contribute to cumulative impacts. (Note: this is done by individual competent 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.

2.9.2 Projects Considered in the Cumulative Impact Assessment

A search was conducted using data from Mayo, Galway and Roscommon County Councils and An Coimisiún Pleanála's planning portals to search for all planned and/or permitted planning applications within 25km of the Proposed Wind Farm turbines. Planning applications considered within this boundary include all live/extant permissions available on the various online portals mentioned above. This distance was chosen as it is considered by the EIAR team that cumulative impacts would not exist with any development proposed/permitted greater than 25km from the Proposed Wind Farm turbines.

Expired planning applications were excluded from the cumulative assessment as it is considered that such development has either been constructed and therefore forms part of the existing baseline or they have not been constructed and the planning permission has expired. Invalid or refused planning applications were also excluded from the cumulative impact assessment. Planning applications (including Local Authority and ACP cases) were then categorised by development description into development categories, and any relevant/large-scale developments were highlighted to the EIAR project team for inclusion in the cumulative impact assessment in each individual EIAR chapter.

2.9.3 Establishing the Cumulative Long List

To establish a long list of existing, permitted and proposed projects to be included in the cumulative impact assessment, cumulative study areas were established for each individual topic area in the EIAR. Following consultation with the EIAR team on each individual topic, the maximum geographical extent of each cumulative study area and justification for this extent was established and is presented in Table 2-8 below. Each cumulative study area was established with regard for the potential environmental receptors, potential impact pathways, topic specific guidance, best practice and professional judgement.

Table 2-8 Cumulative Study Area

Individual Topic	Maximum Extent	Justification
Population & Human Health (including shadow flicker)	Population Study Area for (District Electoral Divisions) Shadow Flicker Study Area (10xRD (1.36km) buffer from Proposed Wind Farm turbines).	The Study Area for Population is identified in Section 5.2.1 in Chapter 5 as the Electoral Divisions where the Proposed Project is located. This Study Area considers the Proposed Project, i.e. both the Proposed Wind Farm and the Proposed Grid Connection, as a whole. This Study Area for Population identified is considered for cumulative effects on Population. For the assessment of cumulative shadow flicker, any other existing, permitted or proposed wind farms are considered where their ten times rotor diameter shadow flicker study area are located within the Shadow Flicker Study Area of 1.36km

Individual Topic	Maximum Extent	Justification
		(ten times the rotor diameter from Proposed Wind Farm turbines) for the Proposed Project.
Biodiversity – Flora & Fauna	10km from the Site.	Using the precautionary approach and given the nature and scale of the Proposed Project, the geographical boundary for terrestrial ecological aspects, i.e. habitats, is 10 km for cumulative assessment for the Proposed Project.
Biodiversity - Bats	15km from the Proposed Wind Farm turbines.	Bats are a mobile species which can cover large distances for foraging and roosting over a range of varied habitats. NatureScot (2021) *'Bats and onshore wind turbines - survey, assessment and mitigation'* recommends a 10km cumulative study area for bats. Bat Conservation Ireland (2026) *'Bat Survey, Assessment & Mitigation Guidelines for Onshore Wind Turbines in Ireland'* recommends an increased cumulative impact assessment zone of 15km. Therefore, on a precautionary basis, a 15km cumulative study area is considered for potential cumulative effects on bats.
Birds	25km from the Proposed Wind Farm turbines for large infrastructural development, such as wind farms, energy and public transport developments.	NatureScot (formerly SNH) guidance 'Assessing the Cumulative Impacts of onshore Wind Energy Developments' (SNH, 2012; 2018) was consulted while undertaking the cumulative assessment. SNH (2012; 2018) emphasises that its priority is to 'maintain the conservation status of the species population at the national level.' However, it is acknowledged that consideration should also be allowed for impacts at the regional level 'where regional impacts have national implications (for example where a specific region holds the majority of the national population)'. Following the guidance of SNH (2012), the cumulative impact assessment has been carried out at the scale of the importance rating of the receptor. A 25km radius of the Proposed Wind Farm turbines was considered a reasonable approximation of the size of a county and a 25km radius of the Proposed Wind Farm turbines was considered a reasonable approximation for the local level.
Land, Soils and Geology	The Site.	As there is no pathway for offsite cumulative impacts for Land, Soils and Geology, the cumulative study area is the EIAR Site Boundary.
Water	WFD Catchment for large infrastructural developments such as wind farms, energy and public transport developments. River Sub Basins for all smaller proposed, permitted or existing plans or projects (i.e. private and commercial type developments).	The Site is located in 2 no. WFD Catchments and the hydrological cumulative study area is delineated as follows: › A quantitative assessment was completed based on flow volumes obtained from the EPA HydroTool Nodes downstream of the Site in the Moy and Killala Bay Catchment. This assessment concludes that the due to dilution no hydrological cumulative effects will occur beyond EPA Hydrotool Node 34_3632 on the Manulla River near Belcarra. At this location, the Manulla River has a total upstream catchment area

Individual Topic	Maximum Extent	Justification
		of 108km2. There will be no potential for cumulative effects beyond this cumulative study area due to increases in flow volumes (as the catchment area increases) and increasing distance from the Site. › A further assessment has been completed within the Corrib Catchment. This assessment concludes that the due to dilution no hydrological cumulative effects will occur beyond EPA Hydrotool Node 30_2656 on the River Robe near Hollymount. At this location, the River Rober has a total upstream catchment area of 184km2. There will be no potential for cumulative effects beyond this cumulative study area due to increases in flow volumes (as the catchment area increases) and increasing distance from the Site. › The Cong-Robe and Swinford GWBs underlying these areas have also been included for the purposes of a conservative cumulative impact assessment.
Air Quality	Air Quality Study Area is 1km from the Site.	Given dust deposition impacts can occur for a distance of 250m from works areas (Assessment of Dust from Demolition and Construction, IAQM 2024) the geographical boundary for the cumulative dust impact is 1km.
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 & Vibration	The list of wind farms which were initially considered in cumulative assessment extended to 25km of the Proposed Wind Farm turbines.	The geographical boundary for the cumulative noise assessment is the area within which noise levels from the proposed, consented and existing wind turbine(s) may exceed 35 dB LA90 at up to 10 m/s wind speed (Institute of Acoustics document Good Practice Guide To The Application Of Etsu-R-97 For The Assessment And Rating Of Wind Turbine Noise). Due to the narrow nature of the Proposed Grid Connection Route trench (~0.825m wide), a 200m buffer zone is an appropriate scale when considering potential cumulative noise effects.
Cultural Heritage	20km buffer from the Site.	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 Project is considered in the context of other developments, in particular other permitted and proposed wind farms within 20km of the Proposed Wind Farm turbines. Direct effects for the Proposed Project are considered to be confined to within the EIAR Site Boundary and relate to construction effects.

Individual Topic	Maximum Extent	Justification
Landscape & Visual	20km buffer from the Proposed Wind Farm turbines for Landscape and Visual effects (LVIA Study Area). 15km from Proposed Wind Farm turbines for effects on landscape character (LCA Study Area).	The Wind Energy Development Guidelines (DoEHLG, 2006) (the Guidelines (DoEHLG 2006)) require that "in areas where landscapes of national or international renown are located within 25km of a proposed wind energy development, the Zone of Theoretical Visibility should be extended as far (and in the direction of) that landscape". There are no landscapes of national or international renown within 25km of the Proposed Wind Farm, and therefore the cumulative boundary for visual and landscape effects is reduced to 20km from the Proposed Wind Farm turbines. The LCA study area has been chosen as 15km for effects on Landscape Character Areas. Through experience conducting LVIA for other wind energy development projects, the assessment team determined that no significant effects on landscape character areas are likely to arise beyond distances of 15km from the Proposed Wind Farm 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	25km buffer from Proposed Wind Farm turbines for large infrastructural developments such as wind farms, energy and public transport developments. Following that, the proposed transport route for each project is considered.	Informed by traffic modelling scenario and the area of influence the Proposed Project has on changing traffic volumes. The potential cumulative traffic effects with the Proposed Project are assessed on the following criteria: › Project status (proposed to operational) › Degree of overlap with the Proposed Project delivery highway network (low to high) › Traffic volumes (low to high) The geographical boundary for the traffic & transport cumulative assessment is defined by the potential for other projects to overlap with the Proposed Project delivery highway network, and so a 25km buffer from turbines and 200m buffer from the Proposed Grid Connection route is deemed appropriate to capture other plans and projects with the potential for cumulative effects with the Proposed Project.
Material Assets: Telecoms	The list of wind farms and other projects which were initially considered in cumulative assessment extended to 25km from Proposed Wind Farm turbines.	The geographical boundary for the telecoms cumulative assessment is defined by the potential for other wind farm projects to interfere with broadcast signals that interact with the Proposed Project.

Once the cumulative study areas were identified and justified, a search was conducted across various platforms and databases in order to compile a list of projects and ongoing activities in the area. The sources used to establish the cumulative long list are provided in Table 2-9 below. The data was first

compiled spatially through a Geographic Information System (GIS). The spatialised data was then exported into a list for further scrutiny and review. This formed the cumulative long list provided in **Appendix 2-3**.

The maximum extent of each cumulative search buffer was determined by the largest specific cumulative study area buffer (25km from Proposed Wind Farm turbines), as shown in Table 2-8 above. All EIAR chapters did not use the maximum extent of the largest buffer. In instances where a specific chapter's cumulative study area was smaller than the cumulative search maximum extent, the cumulative long list was filtered by distance to infrastructure/boundary, creating a chapter specific long list unique to each cumulative study area set out in Table 2-8 above.

Table 2-9 Data sources used for long list compilation

Title	Description	Author
Planning Applications	https://housinggovie.maps.arcgis.com/apps/webappviewer/index.html?id=9cf2a09799d74d8e9316a3d3a4d3a8de	Department of Housing, Local Government and Heritage
An Coimisiún Pleanála Cases	https://www.pleanala.ie/en-ie/map-search	An Coimisiún Pleanála
EIA Portal Points	https://housinggovie.maps.arcgis.com/apps/webappviewer/index.html?id=d7d5a3d48f104ecbb206e7e5f84b71f1	Department of Housing, Local Government and Heritage
Licenced Facilities	https://gis.epa.ie/EPAMaps/	EPA
Waste Schemes	https://gis.epa.ie/EPAMaps/ & MKO's interanl database	EPA & MKO

To allow sufficient time for the cumulative impact assessment to be undertaken for each EIAR topic, the final search and compilation of the cumulative plans and projects list was carried out in April 2026. Therefore, plans and projects that were applied for after April of 2026 are not considered in the cumulative impact assessment.

To gather a comprehensive view of cumulative impacts within the cumulative study area and to inform the EIA process being undertaken by the consenting authority, each relevant chapter within the EIAR addresses the potential for cumulative effects where appropriate and within the context of their identified cumulative study area. A long list of projects considered (i.e., the largest cumulative study boundary of 25km list) across all disciplines in their cumulative impact assessment is included in **Appendix 2-3**.

2.9.3.1 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. Existing land uses within the cumulative study area include ongoing agricultural and forestry practices.

Overall, the Proposed Project has been designed to avoid and mitigate impacts on the environment, and a suite of mitigation measures is set out within the EIAR. The mitigation measures set out in this EIAR will ensure that significant cumulative effects do not arise during the construction, 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.