Muingmore Wind Farm Planning Statement

RWE Renewables (Ireland) Ltd.

Desert House
Lower New Street
Co. Kilkenny
R95 H488

Prepared by:

SLR Environmental Consulting (Ireland) Ltd

7 Dundrum Business Park, Windy Arbour, Dublin, D14
N2Y7

SLR Project No.: 501.065301.00001

20 May 2026

Revision: 0.3

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
0.0	5 December 2025	DR	GH/AOB	AOB
	10 February 2026	DR	AOB	GH/AOB
	26 March 2026	DR	GH/AOB	GH/AOB
	20 May 2026	DR	GH/AOB	GH/AOB
	Click to enter a date.			

Basis of Report

This document has been prepared by SLR Environmental Consulting (Ireland) Ltd (SLR) with reasonable skill, care and diligence, and taking account of the timescales and resources devoted to it by agreement with RWE Renewables (Ireland) Ltd. (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

SLR shall not be liable for the use of or reliance on any information, advice, recommendations, and opinions in this document for any purpose by any person other than the Client. Reliance may be granted to a third party only in the event that SLR and the third party have executed a reliance agreement or collateral warranty.

Information reported herein may be based on the interpretation of public domain data collected by SLR, and/or information supplied by the Client and/or its other advisors and associates. These data have been accepted in good faith as being accurate and valid.

The copyright and intellectual property in all drawings, reports, specifications, bills of quantities, calculations and other information set out in this report remain vested in SLR unless the terms of appointment state otherwise.

This document may contain information of a specialised and/or highly technical nature, and the Client is advised to seek clarification on any elements which may be unclear to it.

Information, advice, recommendations, and opinions in this document should only be relied upon in the context of the whole document and any documents referenced explicitly herein and should then only be used within the context of the appointment.

Table of Contents

Tables

Acronyms and Abbreviations

SLR	SLR Consulting Limited
EIAR	Environmental Impact Assessment Report
EIA	Environmental Impact Assessment
SID	Strategic Infrastructure Development
WEG	Wind Energy Development Guidelines
CRM	Collision Risk Model
LVIA	Landscape and Visual Impact Assessment
EU	European Union
UN	United Nations
DECC	Department of the Environment, Climate and Communications
MCDP	Mayo County Development Plan 2022-2028
ABP	An Bord Pleanála[1]
ACP	An Coimisiún Pleanála
CAP25	The Climate Action Plan 2025
RESS	Renewable Electricity Support Scheme
GHGs	Greenhouse Gases
CCAC	Climate Change Advisory Council
NPF	National Planning Framework First Revision
NSO	National Strategic Outcomes
RSO	Regional Strategic Outcomes
RPO	Regional Policy Objectives
NPO	National Policy Objective
NDP	National Development Plan
NPF	National Planning Framework
CO_2	Carbon Dioxide
ICT	Information and Communications Technology
RSES	Regional Spatial and Economic Strategy
NWRSES	Northern and Western Regional Spatial and Economic Strategy
NWRA	Northern and Western Regional Assembly
NESC	National Economic and Social Council
NIS	Natura Impact Statement
IWEA	Irish Wind Energy Association

[1] Further to the commencement of Part 17, s495(3) of the Planning and Development Act 2024, any references in this application to An Bord Pleanála (ABP, "the Board") shall be construed as references to An Coimisiún Pleanála (ACP, "the Commission").

CEMP	Construction Environmental Management Plan
AA	Appropriate Assessment
NIS	Natura Impact Statement
MCC	Mayo County Council
PDA	Planning and Development Act 2000 (as amended)
BESS	Battery Energy Storage System
RES	Renewable Energy Strategy
Draft RES	Draft Renewable Energy Strategy

Executive Summary

RWE Renewables (Ireland) Ltd. RWE is applying to An Coimisiún Pleanála (ACP) for a Strategic Infrastructure Development, under Section 37E of the Planning and Development Act, 2000 (as amended), to construct a renewable energy development of a 13 no. turbine wind farm development, with associated 110 kV substation, battery energy storage system (BESS), and all associated works on land within the townlands of Muingmore (An Mhoing Mhór), Doolough (Dumha Locha), Tristia (Troiste), Moneynierin (Moing an Iarainn) and Bangor (Baingear) County Mayo (the Proposed Development). The planning application area is c. 454 ha in size. A detailed description of the Proposed Development is set out in **Chapter 2** of the EIAR accompanying this application.

A separate planning application will be submitted pursuant to s182A of the Planning and Development Act 2000 (as amended), for a 110kV underground grid connection and all associated works, from the proposed onsite Substation to the Bellacorick Substation (within the townlands of Doolough, Tristia, Goolamore, Drumanaffrin, Kilteany, Srahmore, Bangor, Srahanarry, Briska, Largan More, Largan Beg, Tawnaghmore, Kilsallagh, Bellacorick). The Proposed Development and the separate grid connection are collectively referred to as the "Proposed Project" and the EIAR assesses the Proposed Project as a whole.

Certain details of the Proposed Development are unconfirmed in this planning application and an opinion as to flexibility on unconfirmed details from the Commission (Case Reference: ABP -321948-25) pursuant to section 287B of the Planning and Development Act 2000 (as amended) accompanies this planning application. The details unconfirmed in this application are the turbine tip height, rotor diameter and hub height. The range of parameters under which the turbine dimensions will fall are specified on the site notice and in the design flexibility opinion that accompanies this application.

This Planning Statement considers the Proposed Project in the context of compliance with and contribution to the principles of proper planning and sustainable development, having regard to International, European, National, Regional and County-level planning policies and plans including the Mayo County Development Plan 2022-2028 together with relevant statutory guidelines and legislation.

This Planning Statement also outlines the requirements of Section 15 of the Climate Action and Low Carbon Development (Amendment) Act 2015 which establishes a legally binding framework with clear targets and commitments set in law, to ensure the necessary structures and processes are integrated on a statutory level to ensure we achieve our national, EU and international climate goals and obligations. Section 15 of the 2015 Act imposes an obligation on public bodies, including planning authorities, to perform their functions, as far as practicable, in a manner consistent with national climate policy objectives.

The Proposed Project is covered by the provisions of the Renewable Energy Directive III (RED III) Directive 2023/2413, which states that there is a presumption that renewable energy plants, connection to the grid and storage are of overriding public interest, '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'.

RED III has been transposed into Irish legislation by way of European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. 274 of 2025), which further supports the need to support these projects in order for Ireland to meet its EU obligations.

The Proposed Project will provide "*energy from a renewable non-fossil source, namely wind energy*", and thus comes within the definition of a RED III development.

Under the Mayo County Development Plan 2022-2028 (MCDP), the Main Wind Farm Development Site is located within an area identified as a Tier 1-Preferred (Large Wind Farms) area. Such areas are stated as having the greatest potential for large wind farms.

The Proposed Project will support the overall objectives of the MCDP in providing wind energy development in accordance with national policy and guidelines. It will contribute to ensuring energy supply in the county with the potential to provide an estimated 74.1 MW to 91 MW of power (for assessment purposes).

The Proposed Project has been designed following an iterative engineering and environmental process, guided by public consultation, and statutory engagement. The accompanying EIAR and NIS demonstrate that, after mitigation, the Proposed Project will not result in significant adverse effects on the environment, residential amenity, or protected ecological sites.

The Proposed Development, if granted, will contribute to the supply of renewable energy which will help achieve the national objectives of decarbonising to combat the climate emergency and the energy security of supply crisis we are currently experiencing.

We respectfully request that ACP give due regard to national objectives and Climate Action Plan 2025 to support wind energy development as part of the International, European, and National binding policies to increase the use of renewable energy and grant permission for the Proposed Development in this instance.

1.0 Introduction

This report has been prepared by SLR Environmental Consulting Ltd (SLR) on behalf of RWE Renewables (Ireland) Ltd. RWE is applying to An Coimisiún Pleanála(ACP) for a Strategic Infrastructure Development, under Section 37E of the Planning and Development Act, 2000 (as amended), to construct a renewable energy development of a 13 no. turbine wind farm development, with associated 110 kV substation, BESS, and all associated works, on land within the townlands of Muingmore (An Mhoing Mhór), Doolough (Dumha Locha), Tristia (Troiste), Moneynierin (Moing an Iarainn) and Bangor (Baingear) County Mayo.

Road improvements will be carried out along the public roadways to facilitate the delivery of abnormal loads and turbine component deliveries from Killibegs Port to site along the R263, N56, N15, N4, N59, R313, L1206 and, L5252, with temporary works to 3 no. over-run areas along the turbine delivery route (No. 1 in the townland of Tristia onto the L1206, No. 2 in the townland of Crossmolina at the junction of the N59 and the R312, and No. 3 in the townland of Bangor off the R313).

A separate planning application for a 110kV underground grid connection and all associated works, from the proposed onsite Substation to the Bellacorick Substation (within the townlands of Doolough, Tristia, Goolamore, Drumanaffrin, Kilteany, Srahmore, Bangor, Srahanarry, Briska, Largan More, Largan Beg, Tawnaghmore, Kilsallagh, Bellacorick), will be lodged to ACP.

The report provides an overview of the Proposed Project as defined in **Chapter 2** of the accompanying Environmental Impact Assessment Report (EIAR)) and related project rationale. It considers relevant planning considerations as stated within EU Directives and Policies, National Policies and Legislation, Regional Planning Policy, and Local Planning Policy, including the National Planning Framework, Regional Spatial and Economic Strategy, Wind Energy Development Guidelines, and the Mayo County Development Plan.

This report should also be read in conjunction with the EIAR which includes an assessment of the likely significant effects of the Proposed Project as a whole, including assessment of the connection to the national electricity grid and the Natura Impact Statement (NIS), accompanying the planning application. Definition of terms

The following terms (Capitalised) are used within this report.

Proposed Project: Refers to the Proposed Development including the Grid Connection Route (GCR).

Proposed Development: Refers to the elements of the Proposed Project for which planning consent is being sought. This encompasses the wind farm and associated infrastructure (including the 33kV collector cables), Habitat Enhancement Area in the north-west quadrant (NWQ), any development associated with the Turbine Delivery Route (TDR), onsite substation, and battery energy storage system (BESS).

Proposed Development Site: The site where the Proposed Development is located, as defined by the Planning Application Boundary.

Main Wind Farm Development Site: part of the Proposed Development Site which includes the proposed wind turbines and associated infrastructure.

The Northern Cluster of the Main Wind Farm Development Site is comprised of a geographical area to the north of the local road, the L5252. Elements of the Proposed Development which will be located in the Northern Cluster comprise.

- 7 no. turbines (turbine nos. 1-7) and their associated access tracks, hardstandings and foundations.
- 1 no. 110kV substation.

- 1 no. temporary construction compound (TCC1).
- 1 no. BESS.
- 2 no. site access points (AP1 and AP2).
- Internal underground 33kV collector cables which connects both clusters to the onsite substation which is located within the Northern Cluster.
- Habitat Enhancement Area in the north-west quadrant (NWQ).

The Southern Cluster of the Main Wind Farm Development Site is defined by the area to the south of the local road, the L5252. Elements of the Proposed Development which will be located in the Southern Cluster comprise:

- 6 no. turbines (turbine nos. 8-13) and their associated access tracks, hardstandings and foundations.
- 1 no. temporary construction compound (TCC2).
- 1 no. meteorological mast.
- 1 no. site access point (AP3).
- Internal underground 33kV collector cables, connecting to the onsite substation which is located within the Northern Cluster.

Turbine Delivery Route (TDR): Refers to the proposed turbine delivery route from Killybegs Port to the Main Wind Farm Development Site and includes the 3 no. Over-run Areas.

Over-run Areas: Refers to the 3 no. areas (Over-run Areas 1, 2 & 3) along the TDR where temporary accommodation works on private lands are required.

Grid Connection Route (GCR): The designated route for the 110kV Underground Electricity Cable from the Proposed Development onsite substation to the national grid connection point at Bellacorick 110 kV Substation. The GCR will be the subject of a separate planning application.

Habitat Enhancement Area in the (NWQ): An area to the north-west of the Main Wind Farm Development Site which will not include any infrastructure related to the Proposed Project other than that to enhance habitat.

1.1 Purpose and Structure of the Planning Statement

This Planning Statement considers the Proposed Project in the context of compliance with and contribution to the principles of proper planning and sustainable development, having regard to International, European, National, Regional and County-level planning policies and plans including the Mayo County Development Plan together with relevant statutory guidelines and legislation.

This Planning Statement is set out as follows:

- Section 1: Introduction.
- Section 2: The Proposed Development.
- Section 3: The Need for the Development.
- Section 4: Relevant Planning Policy.
- Section 5: Summary and Conclusion.

2.0 The Proposed Development

RWE Renewables Ireland Limited are seeking permission to construct a renewable energy development of a development comprising of the construction of a 13 no. turbine wind farm development, with associated 110 kV substation, battery storage, and all associated works on land within the townlands of Muingmore (An Mhoing Mhór), Doolough (Dumha Locha), Tristia (Troiste), Moneynierin (Moing an Iarainn) and Bangor (Baingear) County Mayo. The planning application area is approximately 454 ha in size. Certain details of the proposed development are unconfirmed in this planning application and an opinion on unconfirmed details from An Coimisiún Pleanála (Case Reference: ABP -321948-25) pursuant to section 37CD of the Planning and Development Act 2000 (as amended) accompanies this planning application. The details unconfirmed in this application are the turbine tip height, rotor diameter and hub height. The range of parameters under which the turbine dimensions will fall are specified on this site notice and in the design flexibility opinion that accompanies this application.

The Proposed Development will consist of:

- Construction of 13 no. wind turbines, each with an overall blade tip height between 179-180m inclusive, rotor diameter between 149-163m inclusive, hub height between 98.5-105m inclusive, in two clusters.
- Battery energy storage system (BESS) compound to include control building with welfare facilities, all associated plant and equipment, security fencing and gates, underground cabling, and all ancillary structures, drainage works, as well as storage and parking.
- Construction of crane hardstands, laydown areas and turbine foundations.
- Construction of permanent internal site access roads including passing bays and all associated drainage infrastructure.
- Construction of a permanent 110 kV onsite electricity substation and onsite IPP (Independent Power Producer) substation to include control buildings with welfare facilities, all associated electrical plant and equipment, security fencing and gates, all associated underground cabling, wastewater holding tanks, and all ancillary structures and works.
- Construction of 33kV underground electricity cabling and communications cabling, including joint bays and ancillary works, to connect the windfarm and battery energy storage system to the proposed onsite substation.
- Construction of two temporary construction compounds with associated temporary site offices, parking areas, welfare facilities and security fencing.
- Development of an internal site drainage network and sediment control systems.
- Temporary works as part of road improvements to facilitate the delivery of abnormal loads and turbine component deliveries from Killybegs Port to site, to include 3 no. over-run areas along the turbine delivery route, (No. 1 in the townland of Tristia onto the L1206, No. 2 in the townland of Moneynierin at the junction of the N59 and the R312, and, No. 3 in the townland of Bangor off the R313).
- Construction of 1 no. new site entrance and the construction/ upgrade of 2 no. additional site entrances (all off local road L5252, west of the L1206),
- Ancillary forestry felling to facilitate construction of the development.
- All associated site development works including landscaping, lighting, soil management and the ongoing maintenance and management of the biodiversity measures in accordance with the Habitat Management Plan and the Peat Restoration Plan.
- The replacement of felled trees with the planting of new trees, and;
- The erection of a permanent meteorological mast 100m in height

A 35-year operational life from the date of full commissioning of the entire wind farm and battery storage is being sought for all works (other than temporary and permanent works specified above), and the subsequent decommissioning.

The proposed substation will continue to exist on a permanent basis. Permanent planning permission is being sought for these elements.

A separate planning application for a 110kV underground grid connection and all associated works, from the proposed onsite substation to the Bellacorick Substation (within the townlands of Muingmore, Doolough, Tristia, Goolamore, Drumanaffrin, Kilteany, Srahmore, Bangor, Srahanarry, Briska, Largan More, Largan Beg, Tawnaghmore, Kilsallagh, Bellacorick), will be lodged to An Coimisiún Pleanála.

Please refer to the site notice accompanying the planning application for further details.

2.1 Statement of Authority

This Planning Statement has been prepared by Aislinn O'Brien (Masters in Regional and Local Development and MCD in Civic Design), and Donna Ryan (BA in Spatial Planning and Diploma in Environmental Resource Management) of SLR Consulting.

- Aislinn O'Brien is a chartered planner (MIPI, MRTPI) with 18 years' experience as a planner, project manager with experience in large scale infrastructure, including wind farms, tourism, minerals, and other developments.
- Donna Ryan is a chartered planner (MIPI) and has over 17 years' experience as a planner and project manager, including planning input for SID applications for large scale wind farm applications, transportation applications and industrial and commercial developments. Other experience includes preparing environmental and planning reports for a wide range of projects.

2.2 Requirement for EIA

The Proposed Development includes 13 no turbines and therefore falls within a class of development set out in Schedule 5, Part 1 and 2. It therefore meets the requirements for a mandatory EIA in this regard. An EIAR has been prepared and is included with this Planning Application under separate cover.

2.3 Appropriate Assessment

With respect to European Sites within the vicinity of the Main Wind Farm Development Site, an Appropriate Assessment Screening Report and NIS were prepared to provide information for the competent authority, in this case ACP, to carry out a screening assessment and, if considered applicable by ACP, an Appropriate Assessment (AA) of the Proposed Project in accordance with and in fulfilment of the requirements of Article 6 of the Habitats Directive (92/43/EEC).

The NIS concluded, beyond all reasonable scientific doubt that the Proposed Project, either alone or in combination with other plans or projects will not have an adverse effect on the integrity of any European site in view of its conservation objectives.

Further detail is provided in the AA Screening Report and NIS which accompany this planning application.

2.4 Design Flexibility

A Design Flexibility meeting under section 37CC of the Planning and Development Act 2000, was held with ACP on the 9th of April 2025, via Microsoft Teams. In this meeting a discussion was had on the parameters of the Proposed Development which will remain unconfirmed for

the purpose of the application and the approach to be taken in compiling the planning application and assessing the unconfirmed parameters as part of the EIAR.

A formal record of the design flexibility meeting was received from ACP and is included with the planning application under separate cover.

The EIAR accompanying this application has been prepared on this basis, i.e. it has assessed the full range of parameters including tip height, hub height and rotor diameter. See **Chapter 1** of the accompanying EIAR for details on how the design parameters were assessed for each topic in the EIAR.

The design flexibility that is sought as part of the Proposed Development is not open ended and will comprise the following limited range:

- **Tip Height:** overall ground to blade tip height of between a minimum of 179 m and a maximum of 180 m.
- **Rotor Diameter:** The wind turbines will have a rotor diameter ranging from a minimum of 149 m to a maximum of 163 m.
- **Hub Height:** a hub height ranging from a minimum of 98.5 m to a maximum of 105m- All elements of the Proposed Development are described in **Chapter 2** of the accompanying EIAR.

The minimum and maximum parameters proposed in **Table 1** were identified from three candidate turbine models.

Table 1: Candidate Turbine Parameters

Turbine Type	Tip Height (m)	Hub Height (m)	Rotor Diameter (m)
Vestas V150	180	105	150
Nordex N163	180	98.5	163
Nordex N149	179	104.5	149

The final choice of turbine model will be dictated by the energy production efficiencies of various turbines on the market at the time of the turbine procurement. As a result, the exact specification of turbine within the range is not available at the time of lodging this application. The following elements therefore cannot be confirmed:

- Hub Height.
- Rotor Diameter.
- Tip Height.

The candidate turbines provide the minimum and maximum parameters for the rotor diameter, hub height and tip height. The installed wind turbine may not be any of the three candidate turbines but will be within the range of minimum and maximum parameters set out in **Table 1**. The MW output is estimated here based on turbines of a 5.7 MW to 7 MW inclusive output and only for the purposes of assessment of benefits towards climate as set out in **Chapter 8** of the accompanying EIAR.

2.5 Classification as Strategic Infrastructure Development

The Seventh Schedule to the Planning and Development Act 2000 (as amended) identifies various classes of infrastructure development which, if considered by ACP to be Strategic Infrastructure Development, (SID) requires a planning application to be made directly to it rather than to the relevant local planning authority.

To qualify as SID Section 37A (2) of the Planning and Development Act, 2000 (as amended) stipulates that a project,

i. falls within the scope of one or more of the development classes identified in the Seventh Schedule and any thresholds provided therein:
ii. would satisfy one or more of the following criteria:
    a. It is of strategic economic or social importance to the State or the region in which it would be situate.
    b. It would contribute substantially to the fulfilment of any of the objectives of the National Planning Framework or in any regional spatial and economic strategy in force in respect of the area or areas in which the development would be situate.
    c. It would have a significant effect on the area of more than one planning authority.

The Proposed Development's MW output is estimated to be between 74.1 MW and 91 MW and is therefore covered by the following class of development identified under the heading of 'Energy Infrastructure' in the Seventh Schedule of the Planning and Development Act 2000 (as amended):

> *Development comprising or for the purposes of any of the following (inter alia)*
>
> *"An installation for the harnessing of wind power for energy production (a wind farm) with more than 25 turbines or having a total output greater than 50 MW."*

Please note: the MW output is stated here based on each turbine having an estimated individual output of between 5.7 MW to 7 MW inclusive, which has been estimated for only for the purposes of assessment of climate as set out in **Chapter 8** of the accompanying EIAR.

2.6 Confirmation of SID

A pre application request was made to ACP under reference ABP-318372-23 for a determination that an application of this scale would be considered to be SID. In ACP's response letter dated 9th of December 2025, it was confirmed that the Proposed Development falls within the scope of paragraphs 37A(2)(a), and (b) of the Act. Accordingly, ACP have decided that the Proposed Development is a SID within the meaning of Section 37A of the Planning and Development Act, 2000, as amended.

2.7 Pre-planning Consultation

2.7.1 An Coimisiún Pleanála

First Pre-application Consultation Meeting with ACP

An initial consultation meeting was carried out between the Applicant and ACP on 25th January 2024, during which the initial design parameters of the Proposed Project were set out.

Second Pre-application Consultation Meeting with ACP

A second pre-application consultation meeting with ACP was held on 9th April 2025 (ABP-318372-23).

Meeting Minutes from the meetings on 25th January 2024 and 9th April 2025 are provided in **Volume 3, Technical Appendix 3-5** of the accompanying EIAR.

2.7.2 Mayo County Council

An initial consultation meeting was held online with the Applicant and Mayo County Council (MCC) on 13th December 2023 The Applicant introduced the project at this meeting and the MCC representatives provided feedback in relation to the Renewable Energy Strategy for County Mayo and stated that it was due to be updated.

A second meeting was held on 16th January 2025 in which the results of the baseline environmental surveys and layout design work undertaken were presented.

Meeting Minutes from this meeting on 16th January 2025 are provided in **Volume 3, Technical Appendix 3-4** of the accompanying EIAR.

More detail on how the specific points made in the above meetings with ACP and Mayo County Council have been responded to in the EIA is provided in **Chapter 3** of the EIAR.

2.8 Prescribed Bodies

Prescribed bodies were consulted as part of the scoping exercise for the EIAR which accompanies this application. Please refer to **Chapter 3** of the EIAR for further information on the scoping consultation and feedback received.

Included in the letter issued by ACP on the 9th of December 2025 (ABP-318372-23), was a list of prescribed bodies to be notified of the SID application for the Proposed Development as follows:

- Department of Housing, Local Government and Heritage
- Minister for Agriculture, Food, and the Marine
- Department of Climate, Energy and the Environment
- Department of Enterprise, Tourism and Employment
- Department of Rural and Community Development and the Gaeltacht
- Department of Transport
- Údarás na Gaeltachta
- Mayo County Council
- Sligo County Council
- Donegal County Council
- Northern and Western Regional Assembly
- Transport Infrastructure Ireland
- National Transport Authority
- An Taisce
- An Chomhairle Ealaion (Arts Council)
- Failte Ireland
- The Heritage Council
- Uisce Eireann
- Inland Fisheries Ireland
- Irish Aviation Authority
- CIE

- Iarnrod Eireann
- EPA
- Health and Safety Authority
- Health Service Executive
- Commission for Regulation of utilities
- Office of Public Works
- ESB
- EirGrid

All of the prescribed bodies listed above have been notified of the Proposed SID application and issued with a full copy of all plans and particulars associated with the application.

3.0 The Need for the Development

The need for the Proposed Project is closely aligned with National energy and climate policy which in turn is derived from the overarching European Policy which aims to unify the European Union in energy and climate goals. A full assessment of international, national, regional, and local policies is found below.

3.1 International Global Policies

3.1.1 UN 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. There are 195 parties ratified to the Convention and these are subdivided into Annex I, Annex II, Annex B, Non-Annex I and Least Developed Countries. The UNFCCC seeks to limit average global temperature increases and the resulting climate change.

In addition, the UNFCCC seeks to cope with impacts that are already inevitable. It recognises that the climate system is a shared resource whose stability can be affected by industrial and other emissions of carbon dioxide and other Greenhouse Gases (GHGs). The framework sets no binding limits on GHG emissions for individual countries and contains no enforcement mechanisms. Instead, the framework outlines how specific international treaties (referred to as 'Protocols' or 'Agreements') may be negotiated to set binding limits on GHGs. It does, however, require all parties in Annex 1 [Decision 3 CP.5] (of which the European Union 15 (EU 15) forms part of) to prepare and publish National Inventory Reports (NIRs) on emissions. The Environmental Protection Agency (EPA) is responsible for the preparation of Ireland's NIR.

3.1.2 Kyoto Protocol

Ireland is a Party to the Kyoto Protocol, an international agreement that sets limitations and reduction targets for GHGs for developed countries. It came into effect in 2005, as a result of which, emission reduction targets agreed by developed countries, including Ireland, are binding. Furthermore, in Doha, Qatar, on 8th December 2012, the "Doha Amendment to the Kyoto Protocol" was adopted. The amendment includes:

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

- A revised list of GHG to be reported on by Parties in the second commitment period; and
- Amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period.

During the first commitment period:

- A 5% overall reduction in the emission of GHGs in developed countries was set.
- An average 8% reduction below 1990 levels within the EU was also set.

The second commitment period applied to emissions from 2013 - 2020. All members of the European Union had binding targets in the second commitment period and committed to reduce their GHG emissions by at least 20% by 2020 compared to 1990 levels and to increase this commitment to a 30% reduction if other major emitting countries agree to similar targets under a global climate agreement.

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

3.1.3 COP 21 Paris Agreement

The Conference of the Parties (COP) is the highest body of the UNFCCC and consists of environment ministers who have met annually since 1995 to assess progress in dealing with the issue of climate change. At the Paris climate conference (COP21) in December 2015, 195 countries, including Ireland adopted the first-ever universal, legally binding global climate deal. The agreement sets out a global action plan to put the world on track to avoid dangerous climate change by limiting global warming to well below 2°C above pre-industrial levels and to limit the increase to 1.5°C. Under the agreement, Ireland also agreed on the need for global emissions to peak as soon as possible, recognising that this will take longer for developing countries and to undertake rapid reductions thereafter in accordance with the best available science.

3.1.4 COP25 Madrid

COP25, the 25th session of the COP, was held between the 2nd and 13th of December 2019 in Madrid. The conference was characterised by repeated warnings from civil society (Non Governmental Organisations (NGOs) and corporates) on emerging evidence and scientific consensus on climate change risk. Specifically, it is noted that there are only '10 years left' before the opportunity of limiting global warming to 1.5°C is no longer feasible. As such, the only scenario that makes it possible is a '7.6% reduction of global GHG emissions every year between 2020 and 2030, and to reach net zero emissions by 2050'. However, there was no consensus achieved between states to finalise the operating rules of the Paris Agreement and ensure that it became operational by 2020.

3.1.5 COP26 Glasgow

COP26 was held in November 2021, where the Glasgow Climate Pact was agreed. The pact agrees to focus on the terms of the Paris Agreement and for the first time there was an explicit agreement to reduce use of fossil fuels including coal.

3.1.6 COP27 Sharm el-Sheikh

. COP27 marked the 27th United Nations Climate Change conference, which took place in November 2022 in Sharm El Sheikh, Egypt. During this conference, an agreement was

reached regarding a loss and damage fund which represented a commitment to allocate financial resources to nations that are most susceptible to and impacted by climate change.

3.1.7 COP28 United Arab Emirates

COP28 was held in the United Arab Emirates in November 2023, it marked the conclusion of the first 'global stock take' of the world's efforts to address climate change under the Paris Agreement. It confirmed the overarching aim to keep the global temperature limit of 1.5°C within reach.

The 'stocktake' calls on Parties to take actions towards achieving, at a global scale, a tripling of renewable energy capacity and doubling energy efficiency improvements by 2030. The list also includes accelerating efforts towards the phase-down of unabated coal power, phasing out inefficient fossil fuel subsidies, and other measures that drive the transition away from fossil fuels in energy systems, in a just, orderly, and equitable manner, with developed countries continuing to take the lead.

3.1.8 COP29 Baku Azerbaijan

COP29 was held in Baku Azerbaijan in November 2024, and concluded with the "Baku Finance Goal," which establishes a new collective target for climate finance. This goal commits developed countries to providing at least $300 billion annually to developing nations by 2035, a tripling of the previous goal. The agreement also aims to mobilize an additional $1 trillion from all sources to reach a total of at least $1.3 trillion per year by 2035.

3.1.9 COP30 Brazil

COP30 was held in Belém, Brazil from 10 to 21 November 2025. With the support of over 200 countries, international organizations, and initiatives, the Belém Declaration for Green Industrialization was launched on Friday, November 14, during a leaders' meeting at COP30.

COP30 has adopted a range of measures aimed at enhancing implementation and fostering international collaboration:

Introduction of a Global Implementation Accelerator: This Accelerator will focus on actions that exhibit the greatest potential for scalability and rapid impact in the battle against climate change, particularly in reducing methane emissions and facilitating carbon removal through nature-based solutions. At the same time, it will emphasize interventions capable of creating positive tipping points, such as advancements in renewable energy, battery technology, lowering capital costs, digitalization, and reforms in multilateral banking, to achieve exponential and cascading transformations. The Accelerator will operate in synergy with the Action Agenda, which has achieved a new level of mobilization among actors, resources, processes, and solutions at COP30.

Tripling of Adaptation Finance: A significant milestone aimed at assisting the most vulnerable populations - those who contribute least to climate change yet suffer the most from its consequences.

Establishment of the Belém Mechanism for Just Global Transition: A new tool designed to aid countries in ensuring that the shift towards sustainable economies is equitable and inclusive.

Adoption of Voluntary Indicators to assess progress in enhancing resilience, within the context of the Global Goal on Adaptation.

Initiation of the Technology Implementation Program (TIP), which includes a timeline, and components aimed at bolstering the execution of technology priorities in developing nations.

Endorsement of the new Gender and Climate Action Plan, which outlines initiatives to amplify the role of women in the fight against climate change.

Commencement of a series of dialogues concerning international trade and climate.

Launch of a two-year work program focused on climate finance, emphasizing the predictability of public resources flowing from developed to developing countries.

Acknowledgment of the critical role played by cities, states, and municipalities in climate action.

The Proposed Project will assist in achieving a reduction in global GHG emissions by providing an alternative solution to energy production through fossil fuel consumption, including coal.

3.2 EU Directives and Policies

This section summarises the previous policies and targets for renewable energy and GHG emissions in Europe up to 2030 in order to provide context and establish the progress made in Ireland over the past two decades to achieve these EU targets. The section then details the latest policies and targets with a view of 2030 and beyond. The various directives and policies of the EU set a clear mandate for each member state to transition to sustainable, renewable energy and reduce greenhouse gas emissions. This is reflected in the theme of European Commission President, Ursula von der Leyen's inaugural 'State of the Union' address delivered on 16th September 2020 which emphasised the need to transform the European economy and society to deal with the climate change emergency. It was also stated that the EU aims to reduce the EU's net GHG emission by at least 55% on 1990 levels by 2030.

3.2.1 European Climate Law Regulation (EU) 2021/1119 (European Climate Law)

The European Climate Law Regulation[2] was established on 30th June 2021 and came into effect on 29th July 2021. This Regulation provides a legally binding, irreversible, and responsible pathway for the EU to achieve climate neutrality by 2050. In addition to this overarching legal objective, the Regulation also sets a number of other key objectives:

- Measures to track the progress of EU member states and adjust actions where required accordingly to reach the overarching 2050 target.
- A 55% reduction of net emissions of GHGs as compared to 1990 by 2030 (including clarity on the contribution of emissions reductions and removals.
- A process to set a 2040 climate target which will also take into account the indicative greenhouse gas budget between years 2030 to 2050.
- On the 6th of February 2024, the Commission published its communication on a 2040 climate target alongside an impact assessment. Based on the public consultation advice from the scientific advisory board and the impact assessment, the Commission recommends a net greenhouse gas emissions reduction of 90% by 2040 relative to 1990.

[2] European Climate Law Regulation. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32021R1119#:~:text=This%20Regulation%20establishes%20a%20framework,sinks%20regulated%20in%20Union%20law.

- The establishment of a European Scientific Advisory Board on Climate Change that will provide independent scientific advice going forward. This advisory board was established in 2021.
- Stronger provisions on climate change adaptation in alignment with the Paris Agreement. Such provisions include adaptive capacity of member states, strengthening resilience and reducing vulnerability on climate change. Member states will be required to adopt comprehensive national adaptation strategies and plans based on climate change and vulnerability analysis and most recent scientific evidence.
- A commitment by the EU to both engage with more sectors and to prepare a sector specific roadmap demonstrating a path to climate neutrality in different areas of the economy.

Section 34 of this Regulation is of relevance to the Proposed Project:

"Member States and the European Parliament, the Council and the Commission should, inter alia, take into account: the contribution of the transition to climate neutrality to public health, the quality of the environment, the well-being of citizens, the prosperity of society, employment and the competitiveness of the economy; the energy transition, **strengthened energy security and the tackling of energy poverty**; food security and affordability; the development of sustainable and smart mobility and transport systems; fairness and solidarity across and within Member States, in light of their economic capability, national circumstances, such as the specificities of islands, and the need for convergence over time; the need to make the transition just and socially fair through appropriate education and training programmes; best available and most recent scientific evidence, in particular the findings reported by the IPCC; the need to integrate climate change related risks into investment and planning decisions; cost-effectiveness and technological neutrality in achieving greenhouse gas emission reductions and removals and increasing resilience; and progression over time in environmental integrity and level of ambition." (Own emphasis added)

3.2.2 European Commission Recommendation on Speeding Up Permitting Renewables

In the European Commission's recommendation of 18th May 2022 on speeding up permit granting procedures for renewable energy projects and facilitating Power Purchase Agreements, the European Commission set out a series of recommendations to assist in the speeding up of the permitting process for renewables. In this recommendation, the EC noted that,

> *"The energy sector is responsible for over 75% of the total greenhouse gas emissions in the Union. Speeding up the production of energy from the development and deployment of renewable energy installations is therefore vital for the Union to reach its 2030 renewable energy target and for contributing to reaching the 2030 Union target of at least 55% GHG emission reductions in accordance with Regulation (EU) 2021/1119."*

Key recommendations include:

- To identify key go-to suitable land and sea areas for renewable energy projects. This land should be particularly suitable for the development of renewable energy (renewable go-to areas), while avoiding as far as possible environmentally valuable areas and prioritising *inter alia* degraded land not usable for agriculture.
- to limit 'exclusion zones' where renewable energy cannot be developed to a necessary minimum.

- Member States should streamline environmental impact assessment requirements for renewable energy projects to the extent that is legally possible.
- Member States should implement long-term grid planning and investment consistent with the planned expansion of renewable energy production capacities, taking into account future demand and the objective of climate neutrality.
- Member States should establish simplified procedures for repowering existing renewable energy plants, including streamlined procedures for environmental assessments, and adopt a simple-notification procedure for their grid connections where no significant negative environmental or social impact is expected.
- Member States should set up a contact point tasked with regularly monitoring the main bottlenecks in the permit-granting process and addressing the issues encountered by renewable energy project developers.
- Member States should communicate to the Commission, every two years starting in March 2023, as part of the integrated national energy and climate progress reports to be submitted pursuant to Article 17 of Regulation (EU) 2018/1999 of the European Parliament and of the Council, all available detailed information on the state of implementation of this Recommendation.

3.2.3 REPowerEU

In March 2022, the European Commission published REPowerEU – a Joint European Action for more affordable, secure, and sustainable energy. The main aim of the plan, called REPowerEU, is to make Europe completely independent from Russian fossil fuels by 2030 as a result of current geopolitical tensions in Ukraine. It received backing from the European Heads of State in the Versailles Declaration of 10th and 11th March 2022. On 18th May 2022, the Communication on the REPowerEU Plan (COM/2022/230final) was published.

REPowerEU provides an indication that member states will be required to:

- Accelerate the permit granting process (12 month permitting window for wind energy[3]).
- Ensure that the following items are of "overriding public interest[4]," the planning, construction and operation of renewable energy plants, their connection to the grid and the related grid itself and Storage assets as defined in Article 2 of the Renewable Energy Directive[5].

In December of 2022, a provisional agreement among member states resulted in a number of key objectives which include:

- increasing the resilience, security, and sustainability of the Union energy system through the needed decrease of dependence on fossil fuels,

[3] European Commission. (2022). Commission Recommendation on speeding up permit-granting procedures for renewable energy projects and facilitating Power Purchase Agreements. https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=PI_COM:C(2022)3219&from=EN

4 Member States would be required to ensure that in the permit-granting process, the planning, construction and operation of renewable energy plants, their connection to the grid and the related grid itself, and storage assets are presumed to be the overriding public interest and serving public health and safety when balancing legal interests for the purposes of the Birds, Habitats, and Water Framework Directives.

5 European Commission (2018). Renewable Energy Directive. https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018L2001&from=EN

- diversification of energy supplies at Union level, including by increasing the uptake of renewables, energy efficiency, and energy storage capacity.

New investments to assist member states in the rollout of REPowerEU will be funded through the Innovation Fund and ETS allowances. Key targeted investment objectives include:

- boosting energy efficiency in buildings and critical energy infrastructure.
- decarbonising industry.
- increasing production and uptake of sustainable biomethane, and renewable or fossil-free hydrogen.
- increasing the share and accelerating the deployment of renewable energy.
- improving energy infrastructure and facilities to meet immediate security of supply needs for gas, including liquefied natural gas (LNG), notably to enable diversification of supply in the interest of the Union as a whole.
- oil infrastructure and facilities necessary to meet immediate security of supply needs may be included in the REPowerEU chapter of a member state that has been subject to the exceptional temporary derogation due to its specific dependence on crude oil and geographical situation.
- addressing energy poverty.
- incentivising a reduction of energy demand.
- addressing internal and cross-border energy transmission and distribution bottlenecks.
- supporting electricity storage.
- accelerating the integration of renewable energy sources.
- supporting zero emission transport and its infrastructure, including railways.

Member states will be allocated funding in alignment with the member states dependence on fossil fuels and cohesion policies. Funding will be distributed through the Recovery and Resilience Facility (RRF) regulation.

On the 14th of February 2023, the European Parliament approved the agreement in plenary by a majority. This was signed on the 27th of February 2023 (Regulation (EU) 2023/435) and entered into force on the 1st of March 2023.

3.2.4 RECAST Renewable Energy Directive (RED II)

As part of its 'Clean Energy for all Europeans' package, the European Commission in 2016 proposed an update of the Renewable Energy Directive for the period 2021 – 2030 (RED II). In June 2018, an agreement was made in Europe between the European Commission, the European Parliament, and the Council with regard to increasing renewable energy use in Europe.

The regulatory framework included a binding renewable energy target for the EU for 2030 of 32% with an upwards revision clause by 2023. This agreement was to help the EU meet the Paris Agreement goals. In terms of renewable energy production, the agreement has achieved:

- A binding EU renewable energy target of 32% by 2030, including a review clause by 2023 for an upward revision of the EU level target.
- Improved design and stability of renewable energy support schemes.

The renewable energy Directive 2018/2001/EU entered into force in December 2018.

In July of 2021, the Commission proposed another revision to accelerate the take-up of renewables in the EU to assist in achieving the 2030 energy and climate objectives. The directive set a common target of 32% while the proposed revision sought an increased 40% target as part of the package to deliver on the European Green Deal. In May of 2022 following the Communication on the REPowerEU Plan (COM/2022/230final) to further increase this target to 42.5% by 2030 The revised Directive EU/2023/2413 entered into force on 20 November 2023.

3.2.5 Renewable Energy Directive (RED) III

RED III aims to promote the expansion and increased uptake of energy from renewable sources across all sectors (including industry, transport, buildings, heating and cooling, and the production of hydrogen). It aims to increase the share of renewable energy in the EU's overall energy consumption to 42.5% by 2030, with an additional 2.5% indicative top-up that would allow the overall share to reach 45%.

There is a series of sectoral targets (for industry, transport, buildings, heating, and cooling), including some which are legally binding. The industry sectoral target is the target relevant to the Proposed Project.

RED III states that there is a presumption that renewable energy plants, connection to the grid and storage are of overriding public interest, "...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…"

Except where:

- Member States decide to restrict the application of that presumption in duly justified and specific circumstances to certain parts of their territory, certain technologies, or certain projects in accordance with the priorities set out in their national plans. Member States are required to inform the Commission of any such restrictions and the reasons therefor.

REDIII defines renewable energy as: *" 'Renewable energy' means energy from a renewable non-fossil source, namely wind energy, solar energy (including solar thermal and solar photovoltaic energy), geothermal energy, osmotic energy, ambient energy, tide, wave and other ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas or biogas".*

The revised Directive EU/2023/2413 entered into force on 20 November 2023. The RED III Directive has been partially transposed into Irish legislation by way of European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. 274 of 2025) with the majority of the provisions coming into effect on 7th August 2025.

RED III signifies that Ireland must expedite renewable energy initiatives by establishing a more efficient and quicker permitting process with obligatory deadlines. This encompasses the designation of "Renewable Acceleration Areas" and necessitates a collaborative spatial mapping effort to pinpoint appropriate land and marine locations.

Key effects on Irish renewable energy initiatives are:

- **Accelerated permitting**: The Irish transposing Regulations stipulates specific, compulsory timelines for the planning and permitting phases of renewable energy projects, which include onshore (52 weeks), onshore repowering (30 weeks), and offshore (65 weeks). These timelines aim to considerably diminish project delays. There will be limited opportunities within which the ACP can seek further information, and any further information request cannot affect the permit granting timeline which cannot be stopped and restarted or extended.

- **A "completeness check**": process has also been introduced, and projects can now submit grid applications in parallel with planning applications, which helps reduce overall processing time. At the pre-planning consultation stage, the schedule of information required to inform the completeness check will be addressed by ACP. When submitting the application, the applicant must ensure that all information requested is included in the application. Then, upon receipt of the application, the Commission have 45 days to issue a notice in respect of completeness, which triggers the start of the permit granting timelines.

- **EIA Scoping:** From 1 May 2026, any application lodged with ACP for renewable energy developments are subject to mandatory EIA scoping. A request for an opinion in respect of the scope of an EIAR can only be made once a Notice has been served to a prospective applicant under section 37B(4)(a), the pre-application stage must be complete before the scoping opinion can be requested.

- **Overriding public interest:** "Section 177A of the Planning and Development Act 2000, as amended by the Irish RED III Regulations, states…" *"(10) Proposed development that is the planning, construction and operation of a renewable energy plant, any works necessary for the connection of such a plant to the grid, and any related grid or storage assets, is presumed to be in the overriding public interest and serving public health and safety when balancing legal interests in the individual case*."
- **Renewable Acceleration Areas (RAAs):** The government is mandated to identify and designate specific regions that are optimally suited for renewable energy projects, where permitting processes can be expedited.

- **Coordinated spatial mapping**: Ireland is required to conduct a coordinated spatial mapping exercise to identify all land, subsurface, and marine areas essential for renewable energy installations and associated infrastructure such as grid and storage facilities.

- **Heightened targets**: The overall 2030 renewable energy target for Ireland has increased to help meet the new EU-wide target of 42.5%, which will necessitate more projects being built.

The Proposed Project is classified as a Renewable Energy Plant[6] which has general policy support from the EU as set out in the REPowerEU Plan of May 2022. REPowerEU, fit for 55, RED III and the European Green Deal all provide strong policy support from the EU for renewable energy. This is further reflected in national policy including the Energy Security in Ireland to 2030 strategy.

RED III has been transposed into Irish legislation by way of European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. 274 of 2025), which further supports delivery of these projects so that Ireland can meet its European requirements. The Proposed Project will provide "*energy from a renewable non-fossil source, namely wind energy*", and thus comes within the definition of a RED III development.

3.3 Irish Security of Supply Policy

3.3.1 Policy Statement on Security of Electricity Supply

The Policy Statement on Security of Electricity Supply was published by the Department of the Environment, Climate and Communications in November 2021. The Policy Statement sets out a number of updates to national policy in the context of the Programme for Government commitments relevant to the electricity sector, planning authorities and developers.

The Programme for Government commits Ireland to an average 7% per annum reduction in overall greenhouse gas emissions from 2021 to 2030 (a 51% reduction over the decade) and to achieving net zero emissions by 2050. In order to contribute to the achievement of these targets, the Government has committed that 80% of electricity consumption will come from renewable sources by 2030 on a pathway to net zero emissions. It is expected that most of the renewable energy generated by 2030 will be from wind and solar. Much of the older high-emitting sources, such as peat, coal, and oil, are expected to close over the coming years, with the exception of a reserve for when needed, e.g., to balance the system in times of high demands and low wind/solar generation.

In Ireland, the Commission for Regulation of Utilities has statutory responsibility, under S.I. 60 of 2005, as amended, to ensure security of electricity supply. It has the duty to monitor security of electricity supply and to take such measures as it considers necessary to protect security of supply.

The Policy Statement outlines a number of key challenges to ensuring security of electricity supply including:

- ensuring adequate electricity generation capacity, storage, grid infrastructure, interconnection and system services are put in place to meet demand – including at periods of peak demand.
- developing appropriate market rules to incentivise investment and the behaviours of electricity suppliers and consumers in order to deliver greater complementarity between demand and generation.
- developing grid infrastructure and operating the electricity system in a safe and reliable manner.
- ensuring a diversity of fuel supply sources.

[6]REPowerEU https://commission.europa.eu/publications/key-documents-repowereu_en (accessed 16/6/2023)

- ensuring resilience from cyber security threats.

The Department of the Environment, Climate and Communications has carried out a review of the security of energy supply of Ireland's electricity and natural gas systems for the period out to 2030 in the context of net zero emissions by 2050.

Within the policy statement and in relation to renewable energy and security of supply, the Government recognises that:

- ensuring security of electricity supply continues to be a national priority as the electricity system decarbonises towards net zero emissions.
- the all-island single electricity market has an important role in delivering new generation capacity.
- there is a need for very significant investment in additional flexible conventional electricity generation, electricity grid infrastructure, interconnection, and storage in order to ensure security of electricity supply.

3.3.2 Review of the Security of Energy Supply of Ireland's Electricity and Natural Gas Systems (Consultation)

The consultation document on the review of the Security of Ireland's Electricity Supply was published by the Department of the Environment, Climate and Communications in September 2022. The DECC has carried out research to inform the review, with supporting technical analysis conducted by Cambridge Economic Policy associates Ltd (CEPA).

The document outlines that; "*Despite significant improvements in recent years, Ireland's energy usage per dwelling remains higher than the EU average."*

The consultation document outlines that the "*share of electricity from renewable energy increased almost six-fold between 2005-2020, from 7% to 42%, 35% increase in 15 years*." However, the demand for electricity continues to rise and is forecast to continue to grow over the next 10 years.

The document further states that; *"The share of renewable energy within a country's energy mix also has an important bearing on its energy security of supply. In order to reduce its import dependency, Ireland must increase the level of energy from a diverse number of renewable energy sources. In addition to having a diverse renewables portfolio, the development of storage, demand side response and interconnection will support Ireland's decarbonisation and energy security agenda."*

3.3.3 Energy Security in Ireland to 2030

Energy Security in Ireland to 2030 published by the Department of Climate, Energy and the Environment in November 2023, outlines a strategy to ensure energy security in Ireland up to 2030, while ensuring a sustainable transition to a carbon neutral energy system by 2050.

The report sets out that Ireland's future energy will be secure by moving from an oil- and gas-based energy system to an electricity-led system, maximising our renewable energy potential, and being integrated into Europe's energy systems. Meeting our targets through actions and measures set out in the annually updated Climate Action Plan will deliver this secure energy future.

The report outlines that this can be achieved by prioritising:

- Reduced and Responsive Demand.
- A Renewables-Led System.

- More Resilient Systems.
- Robust Risk Governance.

Under each of these four areas of actions, the report sets out a range of mitigation measures, including the need for additional capacity of indigenous renewable energy.

A follow-up to the Energy Security Package will be published in 2030, and every five years thereafter, with implementation monitored by the Government's Energy Security Group.

Appendix 1 of this strategy outlines the Annex of Actions for each of the four areas of action which were informed by a review of Ireland's Electricity and Gas Networks and will be overseen by the Energy Security Council. The actions are designed to guarantee energy security by implementing mitigation strategies such as enhancing domestic renewable energy sources, securing adequate energy imports, advancing energy storage solutions and fuel diversification, as well as encouraging demand-side response.

With respect to 'A Renewables-Led System Work Programme', the following actions have been identified:

- No. 6 To utilise the National Energy and Climate Plan to ensure all policy incentives are aligned on a regular basis.
- No. 7 To work within the updated European Electricity Market Design to continue to reduce emissions associated with Ireland's conventional capacity over the medium-term.

The renewables-led system work programme is led by the Department of the Environment, Climate and Communications.

In relation to renewable energy and security of supply, the Government recognises that ensuring security of electricity supply is a national priority and that there is a need for significant investment in electricity generation, supply and storage.

The Review of the Security of Energy Supply of Ireland's Electricity and Natural Gas Systems, states that; "*The share of renewable energy within a country's energy mix also has an important bearing on its energy security of supply. In order to reduce its import dependency, Ireland must increase the level of energy from a diverse number of renewable energy sources. In addition to having a diverse renewables portfolio, the development of storage, demand side response and interconnection will support Ireland's decarbonisation and energy security agenda.".*

The report Energy Security in Ireland to 2030, sets out a range of mitigation measures, including the need for additional capacity of indigenous renewable energy. Appendix 1 of this strategy outlines the Annex of Actions which are designed to guarantee energy security by implementing mitigation strategies such as enhancing domestic renewable energy sources, securing adequate energy imports, advancing energy storage solutions and fuel diversification, as well as encouraging demand-side response.

The Proposed Project aligns with these policies in providing indigenous renewable energy sources and storage solutions.

4.0 Relevant Planning Policy

This section of the Planning Statement assesses the Proposed Project against the relevant planning policies. The assessment is presented on a document-by-document basis, with each section beginning with an overview of the relevant policies followed by an assessment against these policies.

National energy and climate policy is derived from the overarching European Policy which aims to unify the European Union in energy and climate goals. The following sections sets out the relevant national policies which will influence the development of the country in the coming decades with respect to energy production, carbon neutrality and climate change mitigation.

These policies are supported by the Programme for Government (2025) 'Securing Ireland's Future'[7] which focuses on economic stability, infrastructure investment and green transition. The government are committed to "*sustained action to tackle the climate crisis*" and to decarbonise the economy. Further commitment is given to delivering a "*strong and stable economy*" and the *"infrastructure required to sustain a growing society*". The Programme for Government sets out the Government's commitment to "*deliver actions to achieve 51% reduction in emissions from 2018 to 2030 and net-zero emissions no later than 2050*" and achieve "80% of Ireland's electricity generation from renewable sources by 2030".

4.1 National Planning Framework First Revision (April 2025)

As a strategic development framework, Project Ireland 2040: The National Planning Framework (NPF), demonstrates an approach that joins up ambition for improvement across the different areas of our lives, bringing the various government departments, agencies, State owned enterprises and local authorities together behind a shared set of strategic objectives for rural, regional, and urban development.

In April 2025 the Government published the First Revision of the National Planning Framework, to take account of changes that have occurred since it was published in 2018 and to build on the framework that is in place. The revised Framework sets out a vision and a shared set of goals for the Country as National Strategic Outcomes (NSOs).

The NPF outlines that the Government has established ambitious goals to reach 9 GW of onshore wind, 5 GW of offshore wind, and 8 GW of solar energy by 2030. Additionally, it aims to support at least 500 MW of local community-based renewable energy initiatives and enhance levels of new micro-generation and small-scale generation. Consequently, the expedited provision of further renewable electricity generation is crucial for Ireland to fulfil its climate objectives, lower its greenhouse gas emissions, and bolster its energy security by decreasing dependence on imported fossil fuels and diversifying its electricity supply.

The NPF is supported by a series of National Strategic Outcomes which the Framework seeks to deliver. The purpose of the National Strategic Outcomes (NSOs) is to create a single vision, through a shared set of goals for every community across the country.

The most pertinent outcomes in the context of the Proposed Project are as follows:

- National Strategic Outcome 3: Strengthened Rural Economies and Communities,
- National Strategic Outcome 6: A Strong Economy Supported by Enterprise, Innovation and Skills,

[7] Department of the Taoiseach (2025), Programme for Government: Securing Ireland's Future.

- National Strategic Outcome 8: Transition to a Carbon Neutral and Climate Resilient Society.

The national climate objective is to achieve a competitive, low-carbon, climate-resilient, biodiversity rich, and environmentally sustainable and carbon neutral economy by 2050.

Section 9.2 Resource Efficiency and Transition to a Neutral Carbon Economy of the NPF states the government has committed to achieving targets underpinned by the adoption of a series of carbon budgets and national Climate Action Plans over the period to 2050, informed by UN and EU policy. These actions are also underpinned by other key national policies including the National Development Plan, National adaption Framework and by Sectoral Adaption Plans.

In order to achieve these objectives, the following National Policy Objectives (NPOs) are of relevance to the Proposed Project:

National Policy Objective 70 *Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a climate neutral economy by 2050.*

National Policy Objective 71: *"Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development."*

National Policy Objective 72: "*Support an all-island approach to the delivery of renewable electricity through interconnection of the transmission grid."*

National Policy Objective 73 *Support the co-location of renewable technologies with other supporting technologies and complementary land uses, including agriculture, amenity, forestry and opportunities to enhance biodiversity and promote heritage assets, at appropriate locations which are determined based upon the best available scientific evidence in line with EU and national legislative frameworks.*

National Policy Objective 74: *Each Regional Assembly must plan, through their Regional Spatial and Economic Strategy, for the delivery of the regional renewable electricity capacity allocations indicated for onshore wind and solar reflected in Table 9.1 below, and identify allocations for each of the local authorities, based on the best available scientific evidence and in accordance with legislative requirements, in order to meet the overall national target.*

National Policy Objective 75: *"Local Authorities shall plan for the delivery of Target Power Capacity (MW) allocations consistent with the relevant Regional Spatial and Economic Strategy, through their City and County Development Plans."*

The Proposed Project will support the expedited provision of further renewable electricity generation which is crucial for Ireland to fulfil its climate objectives, lower its greenhouse gas emissions, and bolster its energy security by decreasing dependence on imported fossil fuels.

With respect to the NPO's outlined above, the Proposed Project will:

- Generate renewable energy (estimated for the purpose of climate assessment to be between 74.1 MW and 91 MW output) and support national objectives in achieving a climate neutral economy by 2050, in line with NPO70.
- Support the delivery of renewable electricity generating development in line with NPO71, by providing 13 no. wind turbines and a battery energy storage system.
- Support an all-island approach to the delivery of renewable electricity in line with NPO72.
- Support the co-location of renewable technologies with other supporting technologies including forestry and enhanced biodiversity measures in line with NPO73, by designing a development which creates minimal impact on the surrounding land uses and enhances biodiversity measures where possible.
- Support the Regional Assembly in delivering renewable electricity capacity to meet national targets in line with NPO74.
- Support Mayo County Council in meeting the Target Power Capacity (MW) for Mayo, in line with the NPO75.

It is submitted that the Proposed Project, if realised, would provide a significant contribution with respect to achieving national renewable energy and climate action targets, as set out in the NPF. The Proposed Project would provide a 13 no. turbine wind farm capable of generating an estimate of between 74.1 MW and 91 MW output (for assessment purposes in the climate chapter to evidence predicted benefits) by means of renewable technology, therefore, contributing to the national policy objectives of the NPF. The Proposed Project therefore contributes substantially to the fulfilment of the national policy objectives in the National Planning Framework.

4.2 Project Ireland 2040: National Development Plan

The National Development Plan 2018-2027 (NDP) published in February 2018, in tandem with NPF, seeks to drive Ireland's long term economic, environmental, and social progress over the next decade, in accordance with the spatial planning context of the NPF.

The key role of the NDP is to set out the updated configuration for public capital investment over the next 10 years to achieve the National Strategic Outcomes as set out within the NPF.

The NDP outlines several key energy initiatives, that set out to diversify our energy resources, and to assist in the transition towards a decarbonised society.

The NDP further emphasises National Strategic Outcome 8: Transition to Sustainable Energy, noting that:

"Ireland's energy system requires a radical transformation in order to achieve its 2030 and 2050 energy and climate objectives. This means that how we generate energy and how we use it, has to fundamentally change. This change is already underway with the increasing share of renewables in our energy mix and the progress we are making on energy efficiency.

Investment in renewable energy sources, ongoing capacity renewal, and future technology affords Ireland the opportunity to comprehensively decarbonise our energy generation. By 2030, peat and coal will no longer have a role in electricity generation in Ireland. The use of

peat will be progressively eliminated by 2030 by converting peat power plants to more sustainable low-carbon technologies."

In achieving a Low-Carbon, Climate Resilient Society, the NDP outlines a Renewable Energy Support Scheme (RESS) to support up to 4,500 megawatts of additional renewable electricity by 2030. It is considered that such schemes, in conjunction with greater investment in renewable energy, diversity of supply, and increased utilisation and adoption of electricity storage, will significantly assist in promoting a low carbon, less energy intensive supply.

4.3 Project Ireland 2040: National Development Plan Review 2025

On 4th October 2021, the Government published an updated 'National Development Plan 2021 – 2030'. Chapter 3 Climate Action and the Environment provides a relevant section with respect to Investing for low-carbon, resilient electricity systems. In effect, the NDP Review commits to increasing the share of renewable electricity up to 80% by 2030.

NSO 8 - Chapter 13: Transition to a Climate-Neutral and Climate-Resilient Society describes 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. In Ireland, we have significantly stepped up our climate ambition. The Climate Action and Low Carbon Development (Amendment) Act 2021 commits us to a 51% reduction in our overall greenhouse gas emissions by 2030, and to achieving net zero emissions no later than by 2050."

Furthermore, it is stated that:

"The investment priorities included in this chapter 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."

Further annual ceilings for the Department beyond 2025 will be agreed on a rolling 5-year basis from 2022. It is further stated that public capital investment choices over the next 10 years must not only contribute to the objective of a 51% reduction in greenhouse gas emissions by 2030 but also lay the pathway to achieve the national climate objective of net-zero GHG emissions by 2050.

With respect to the above, the following Strategic Investment Priorities relevant to wind farm development are provided:

- Strategic Investment Priorities – Renewable Energy.
- Regular RESS auctions will deliver competitive levels of onshore wind and solar electricity generation which indicatively could be up to 2.5 GW of grid scale solar and up to 8 GW of onshore wind by 2030.
- The RESS will also support the delivery of up to 5 GW of additional offshore renewable electricity generation by 2030.

In July 2025, the Government published a review of the National Development Plan, which sets out to unlock housing, upgrade water and energy infrastructure, deliver more roads and provide better public transport.

With respect to climate Action, the review outlined that the:

"*Climate Action Plan 2025 sets out a range of policies and measures to meet these targets, in areas such as renewable energy, retrofitting, public transport and energy efficiency, many of which require significant capital investment to achieve and fully realise the potential*

benefits. Public investment alone will not be sufficient to reach these goals and the use of all key policy levers available to Departments to deliver on Ireland's obligations are required. In addition to the allocation of public capital expenditure, well-designed regulatory measures, taxation, education and behavioural change programmes, and private investment will all be required to further climate action."

Section 4.2 states:

"The Programme for Government, Securing Our Future, sets out the need to improve Ireland's infrastructure, especially housing, energy, water, transport, and health digitalisation.

Prioritisation of these areas is necessary to deliver on the core ambition for the Review to deliver the supporting infrastructure to enable the delivery of 300,000 additional homes by

2030 and to boost our international competitiveness.

Accordingly, prioritisation has been guided by the following criteria:

• The critical infrastructure investment priorities identified in the Programme for Government.

• The capacity of sectors to deliver proposed projects and programmes within the review period, taking into account trade-offs within and between sectors (e.g. construction labour supply).

• The cost of proposals in the context of competing priorities and existing capital funding levels; and

• The alignment of projects with the NDP's core focus on housing delivery and economic competitiveness."

Section 5.8 states:

"NDP Priority Infrastructure

The National Development Plan will provide for the provision of up to €3.5 billion in new equity to support investment in electricity grid infrastructure over 2026 – 2030. €2 billion will be provided to EirGrid and €1.5 billion to ESB. This equity will enable both companies to significantly increase capital investment to expand electricity transmission and distribution network infrastructure."

Chapter 7 states:

"climate is one of the key drivers of demand for capital, as we, as a country, aim to ensure the necessary infrastructure is in place to meet our ambitious climate objectives, and fully realise the benefits of a green, sustainable economy.

The Programme for Government 2025 acknowledges that the delivery of essential infrastructure is a key driver in attracting and retaining investment in Ireland, growing our economy, fostering regional development, delivering on our housing targets and achieving our ambitious climate goals.

Ireland has legally binding climate, environmental, and energy targets, including as outlined in national legislation in the Climate Action and Low Carbon Development Act (as amended) and in EU legislation under a number of Directives and Regulations.

The Programme for Government affirmed that Government will deliver actions to achieve a 51% reduction in emissions from 2018 to 2030 and net-zero emissions no later than 2050.

This is one of a range of environmental targets and obligations under EU and national legislation, with policies and strategies to meet these commitments, including in the Climate Action Plan, National Adaptation Framework, National Biodiversity Action Plan, forthcoming Nature Restoration Plan and other policy documents…"

The above highlights that subject to the appropriate planning and environmental assessments, onshore wind farm development would support the achievement of national objectives and related investment in renewable electricity generation.

4.4 Climate Action and Low Carbon Development (Amendment) Act 2021

In 2021, the Government of Ireland approved the Climate Action and Low Carbon Development (Amendment) Act 2021 which commits to net-zero emissions by 2050 and an Interim Target of 51% reduction to be reached by 2030, relative to a baseline of 2018.

The Act is to provide for the approval of plans by the Government in relation to climate change for the purpose of pursuing the transition to a climate resilient, biodiversity rich and climate neutral economy by the end of the year 2050. The Government is required to adopt a series of economy-wide five-year carbon budgets, with the first two five-year carbon budgets correlating to the Interim Target. This includes a provision for the first two five-year carbon budgets to equate to a total reduction of 51% emissions over the period to 2030, in line with the programme for Government which commits to a 7% average yearly reduction in overall greenhouse gas emissions over the next decade, and to achieving net zero emissions by 2050. This Act drives implementation of a suite of policies to help achieve this goal. The Act also provides the framework for Ireland to meet its international and EU climate commitments and to become a leader in addressing climate change. The Act amends the Climate Action and Low Carbon Development Act 2015 to significantly strengthen the framework for governance of climate action by the State to realise Ireland's r national, EU and international climate goals and obligations.

Section 15 of this Act states that relevant bodies, which includes local authorities and ACP shall perform their 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 in so far as practicable.

The importance of Section 15 has been highlighted in the recent ruling made by the High Court in Ireland regarding the Coolglass Wind Farm project (Coolglass Wind Farm Limited v An Coimisiún Pleanála [2026] IESC 5), delivered on 4 February 2026. The Supreme Court - dismissing the Commission's appeal from the High Court judgment of Humphreys J ([2025] IEHC 1) - confirmed that the amendments effected by the 2021 Act are of real importance and effect. The obligation under Section 15 is one not merely of process but of outcome: a decision of the Commission, if challenged, is assessed not by a rationality standard but by reference to whether it complies with the legal obligation of consistency with the climate objectives. Section 15 accordingly creates a binding and enforceable legal duty.

The Supreme Court was equally clear, however, as to the proper scope of that duty. The obligation is one of consistency - which implies a range of possible outcomes that may satisfy the test - rather than one of straightforward compliance. Section 15 operates as a climate sense-check on the functions of all relevant bodies, ensuring that decisions and actions across public bodies are aligned with national climate objectives. It is acknowledged that it does not, in the ordinary course of individual planning decisions, operate as an automatic presumption in favour of the grant of permission for renewable energy development.

4.5 Climate Action Plan 2025

The Climate Action Plan 2025 (CAP25) represents Ireland's revised strategy aimed at achieving its climate objectives, which encompass a 51% decrease in greenhouse gas emissions by 2030 and attaining climate neutrality by 2050. The plan prioritizes the swift execution of initiatives across six essential sectors - Agriculture, Transport, Electricity, Buildings, Industry, and Land Use/Forestry - while highlighting the necessity of bridging the emissions gap. CAP25 reaffirms targets, including the goal of raising electricity from renewable sources to 80% by 2030, and presents updated mandates for the public sector.

By placing climate solutions at the heart of Ireland's social and economic development, CAP2025 outlines how the country can expedite the necessary actions to address the climate crisis. The CAP25 reaffirms Ireland's objectives for renewable energy, which includes achieving 80% of electricity from renewable sources by 2030, for onshore wind this includes, 2GW by 2025 and 9GW by 2030.

It also delineates priority actions for 2025, such as formulating policies for the repowering of existing wind farms, issuing recommendations for long-duration energy storage, and creating a regulatory framework for offshore wind. The plan is designed to enhance renewable capacity, bolster both the onshore and offshore wind industries, and expand solar energy generation, while also aiming to decarbonize other sectors through initiatives like biomethane production and the enhancement of grid infrastructure.

4.6 Progress Towards the CAP25 Targets: Ireland's Greenhouse Gas Emissions Projections (2024-2055)

In May 2025, the EPA published an updated report, titled ‘Ireland's Greenhouse Gas Emissions Projections 2024-2055’, this report is an updated version of the one published in 2022. It provides an updated assessment of Ireland’s total projected GHG emissions out to 2055. This includes an assessment of progress towards achieving its National ambitions under the Climate Action and Low Carbon Development (Amendment) Act 2021 and EU emission reduction targets for 2030 as set under the EU Effort Sharing Regulation (Regulation (EU) 2018/842 (as amended by Regulation (EU) 2023/857).

The Key Findings from the report are as follows:

- Ireland is currently falling short of its 2030 climate objectives, with a considerable deficit anticipated for the initial carbon budget (2021-2025) and even greater deficits expected for future budgets.
- The carbon budget for 2021-2025 is expected to be exceeded by 8 to 12 Mt CO2eq, and the subsequent budget period (2026-2030) is also projected to be significantly surpassed, even when considering the carryover from the first budget.
- Electricity, Industry, and Transport are forecasted to exceed their emissions ceilings for 2030.
- The disparity between the 'Existing Measures' and 'Additional Measures' scenarios underscores that the current implementation is inadequate. Significant annual emissions reductions are necessary for 2024-2025 across various sectors to remain within the first carbon budget, as indicated by the EPA.

During its operation, it is estimated for assessment purposes that the Proposed Project will generate 74.1 MW and 91 MW output of electricity which would be sufficient to supply between 54,020 to 66,430 Irish households with electricity per year, based on the average Irish household using 4.2MWh of electricity[8].". The Proposed Project has the potential to displace as estimated between 1,785,538 to 2,206,043 tonnes of CO_2 over the operational lifetime (35 years). Thus, this energy will be used to offset the same amount of energy that would otherwise be generated from energy sources with higher GHG emissions. Therefore, the Proposed Project supports the delivery of targets within CAP 25.

4.7 Section 28 Guidelines

Section 28 Guidelines are mandatory ministerial directives issued under the Planning and Development Act 2000 (PDA) and provide national guidance to planning authorities in carrying out their functions. These guidelines are set to be replaced under the Planning and Development Act 2024 with a new framework called National Planning Statements. At the time of writing this report, the existing S28 guidelines remain in force. Planning authorities and ACP are required to have regard to s28 guidelines and to comply with any specific planning policy requirements contained therein, in the performance of their functions.

4.7.1 DoEHLG Wind Energy Development Guidelines (WEG, 2006)

The WEG (2006) published by the Department of the Environment, Heritage, and Local Government (DoEHLG) offer guidance to planning authorities assessing planning applications for wind farm developments. The guidelines set out criteria which assist in the identification of suitable locations for wind energy development. They are also of assistance to developers and the wider public in considering wind energy development.

The Proposed Project has been assessed against the provisions of the WEG 2006, in terms of design and siting. The Proposed Project is in line with the recommendations as set out in the WEG, please refer to **Table 2** below for further details.

4.7.2 Draft Wind Energy Guidelines (2019)

The Draft Revised Wind Energy Development Guidelines were published in December 2019 for public consultation. The guidelines will supersede the 2006 guidelines if formally adopted by the government. The revised guidelines aim to apply consistency across all Renewable Energy Strategies with regard to Development Management objectives. **Table 2** below sets out the compliance of the Proposed Project to both 2006 and 2019 Guidelines.

The key points of note in the draft Revised Guidelines include:

- Revised set back distances. Four times the tip height is to be applied between turbines and the nearest point of the curtilage of any residential property with a mandatory minimum set back distance of 500 meters to be applied.
- Revised noise limits provide a higher level of protection to nearby residential receptors. The draft guidelines propose a noise limit, referred to as a “Relative Rated Noise Limit (RRNL) in the range of 35 – 43 dB(A) while not exceeding the background noise level by more than 5dB(A) with an upper limit of 43 dB(A)” (Section 5.7.11).
- Section 7.16 of the draft guidelines confirm a policy of zero shadow flicker at nearby existing dwellings or other affected properties. The draft guidelines state that a

[8] March 2017 Commission for Energy Regulation Review of Typical Domestic Consumption CER/17042 (still in use in renamed Commission for Regulation of Utilities most recent Estimated Annual Bills https://www.cru.ie/publications/28025/)

condition "Should" be attached to all planning permissions to ensure that there will be no shadow flicker at any existing nearby dwelling.

- Wind energy developers will have to provide an opportunity for the Proposed Project to be of enduring economic or social benefit to the local community, whether by facilitating community investment/ ownership in the project, other types of benefits/ dividends, or a combination of the two.

The Proposed Project has been designed in accordance with the current statutory Section 28 Ministerial Guidelines, Wind Energy Development Guidelines 2006. We are aware that these guidelines are subject to targeted review and therefore the design of the Proposed Project has adhered to the Draft Revised Wind Energy Development Guidelines, published by the Department of Housing, Planning and Local Government (December 2019), where it is considered to represent best practice.

The Draft Guidelines are referred to in **Chapters 9** & **11** of the accompanying EIAR in relation to the methodology for assessment. Here it is noted that the Draft Guidelines may be subject to further revisions following public consultation and are not considered to represent current best practice. As such, the noise limits and shadow flicker from the 2006 guidelines form the basis of the assessment.

Table 2: Compliance with the Wind Energy Development Guidelines (2006) and Draft Wind Energy Guidelines (2019)

Topic Area	Requirement, Compliance	Wind Energy Development Guidelines (2006)	Draft Revised Wind Energy Development Guidelines December 2019
Noise	Requirement	A lower limit of 45dB(A) or a maximum increase of 5dB(A) above background noise at nearby noise sensitive locations. In low noise environments where background noise is less than 30 dB(A), it is recommended that the daytime level of the LA90, 10min of the wind energy development noise be limited to an absolute level within the range of 35-40 dB(A). Noise unlikely to be a significant problem where the distance from the nearest turbine to any noise sensitive property is more than 500 metres.	Relative Rated Noise Limit (RRNL) in the range of 35-43dB(A) shall apply, while not exceeding the background noise level by more than 5dB(A) with an upper limit of 43 dB(A). 500m setback from individual properties.
	Compliance	Complies with 2006 Guidelines. Please refer to **Chapter 9** of the	These guidelines have yet to be finalised, have not been adopted and are not

Topic Area	Requirement, Compliance	Wind Energy Development Guidelines (2006)	Draft Revised Wind Energy Development Guidelines December 2019
		accompanying EIAR with respect to noise and the construction, operation and decommissioning of the Proposed Project.	considered best practice. The 2006 Guidelines, as supplemented by the ESTU-R-97 and IOA methodologies described in **Chapter 9** of the accompanying EIAR, are considered best practice and have been applied in this assessment.
Shadow Flicker	Requirement	10 rotor diameters from each turbine. If a turbine cannot be relocated, automatic shutoff during periods of potential shadow flicker should occur.	No shadow flicker at any existing nearby dwelling or other relevant existing affected sensitive property.
	Compliance	It is an objective of the developer to have zero shadow flicker at all nearby properties. Mitigation measures have been incorporated into the project to avoid shadow flicker in line with the guidelines. Please refer to **Chapter 11** of the accompanying EIAR with respect to Shadow Flicker and the Proposed Project. The Applicant is committed to implementing mitigation, through a shadow flicker shut down protocol.	It is an objective of the developer to have zero shadow flicker at all nearby properties. Mitigation measures have been incorporated into the project to avoid shadow flicker in line with the guidelines. Please refer to **Chapter 11** of the accompanying EIAR with respect to Shadow Flicker and the Proposed Project. The Applicant is committed to implementing mitigation, through a shadow flicker shut down protocol.
Visual Disturbance	Requirement	No specific setback distance listed.	• **Mandatory, minimum setback of 500m** from nearest turbine to the nearest point of the curtilage of any residential receptor. • 4 tip heights from each turbine to the curtilage of the nearest residential receptors– this results in a distance of **720m**

Topic Area	Requirement, Compliance	Wind Energy Development Guidelines (2006)	Draft Revised Wind Energy Development Guidelines December 2019
			(180m x4) for the maximum tip height and 716m (179m x 4) for the minimum tip height.
	Compliance	Complies with 2006 Guidelines.	In this regard the proposed layout has achieved a minimum separation distance in excess of 4 times tip height (740 m) between turbine locations and the closest dwellings for all turbines within the range. Please refer **to Chapter 4** and **Chapter 10** of the accompanying EIAR for further details.
Proximity to Roads and Railways	Requirement	Best practice indicates that it is advisable to achieve a safety set back from National and Regional roads and railways of a distance equal to the height of the turbine and blade.	Although wind turbines erected in accordance with standard engineering practice are stable structures, best practice indicates that it is advisable to achieve a safety set back from National and Regional roads and railways of a distance equal to the height of the turbine to the tip of the blade plus 10%.
	Compliance	The nearest National or Regional Road to the Main Wind Farm Development Site is the R313, which is c. 4 km away. All turbines comply with this requirement.	The nearest National or Regional Road to the Main Wind Farm Development Site is the R313, which is c. 4 km away. All turbines comply with this requirement.
Proximity to power lines	Requirement	Adequate clearance between structures and overhead power lines as specified by the electricity undertaker should be provided. There is a statutory obligation to notify the electricity distributor of	The distance between an overhead transmission line (110kV, 22kV or 400kV) and a commercial wind turbine should not be less than three and a half rotor diameters unless EirGrid have agreed a reduction based on a risk

Topic Area	Requirement, Compliance	Wind Energy Development Guidelines (2006)	Draft Revised Wind Energy Development Guidelines December 2019
		proposed developments within 23 meters of any transmission or distribution line. • **23m** from nearest turbine to any transmission distribution line**.**	assessment. The minimum clearance for all turbines and overhead transmission lines must be falling distance (measured from the edge of the foundation) plus an additional flashover distance for the relevant voltage.
	Compliance	A low voltage overhead line traverses the Main Wind Farm Development Site along the L5252. The nearest wind turbine to the powerline is 379 m to the north and 200 m to the south. In this regard the Proposed Project has achieved the required distances.	The proposed rotor diameter ranges from 149 m to 163 m. which would equate to a minimum clearance of between 521.5 m to 570.5 m. A low voltage overhead line traverses the Main Wind Farm Development Site along L5252. The nearest wind turbine to the power line is 379 m to the north and 200 m to the south. The Proposed Project does not comply with the draft WEG 2019 but does comply with the WEG 2006, which are the applicable guidelines in this instance. The Applicant will work with ESB networks to ensure there is no impact on the power lines as a result of the proposed project.

4.7.3 Spatial Planning and National Roads, Guidelines for Planning Authorities

The Spatial Planning and National Roads Guidelines were prepared in the context of the delivery of the National Spatial Strategy and actions identified in the document 'Smarter Travel, A Sustainable Transport Future, A New Transport Policy for Ireland 2009-2020'. The Minister for the Environment, Community and Local Government has issued these guidelines under Section 28 of the Planning and Development Act 2000 (as amended). Planning authorities and ACP are required to have regard to the guidelines in the performance of their functions under the Planning Acts.

The guidelines set out planning policy considerations relating to development affecting national roads (including motorways, national primary and national secondary roads) outside

the 50/60 km/h speed limit zones for cities, towns, and villages. The guidelines have been developed by following a number of key principles and aim to facilitate a well-informed, integrated, and consistent approach that affords maximum support for the goal of achieving and maintaining a safe and efficient network of national roads in the broader context of sustainable development strategies, thereby facilitating continued economic growth and development throughout the country. One of the 'Key Messages' within these guidelines is the need for development plans to "*include policies which seek to maintain and protect the safety, capacity and efficiency of national roads and associated junctions, avoiding the creation of new accesses and the intensification of existing accesses to national roads where a speed limit greater than 50 kmh applies".*

The Proposed Project will not require access from the Main Wind Farm Development Site to a national or regional roadway. Any temporary works to the national road network to facilitate works associated with the Proposed Project will be carried out in agreement with the TII and Local Authorities and details of the proposed works will be agreed as part of the Construction and Traffic Management Plan which will be submitted and agreed prior to any commencement of works on site.

4.8 Best Practice Guidelines

4.8.1 Irish Wind Energy Association (IWEA) Best Practice Principles in Community Engagement and Community Commitment 2013

The Best Practice Principles in Community Engagement and Community Commitment were published by IWEA in 2013. 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 inclusion of community benefit has now been supplemented by the provisions of the RESS.

However, the IWEA publication also sets out Best Practice Principles of community engagement when planning the engagement strategy and preparing associated literature. The aim of the publication is to ensure that the view of local communities is taken on board at all stages of development and that local communities share in the benefits of the development. Throughout the consultation process for the Proposed Project, specific regard has been taken of this guidance document.

Details of the public and stakeholder consultation process carried out throughout the design of the Proposed Project is detailed in **Chapter 1** and **Chapter 3** of the accompanying EIAR. This consultation process was carried out in line with IWEA best practice principles.

4.8.2 Code of Practice for Wind Energy Development in Ireland - Guidelines for Community Engagement

In December 2016, the Department of Communications, Climate Action, and Environment (DCCAE) issued a code of practice for wind energy development in relation to community engagement. This Code of Good Practice:

> *"Is intended to ensure that wind energy developm*ent *in Ireland is undertaken in observance with the best industry practices, and with the full engagement of communities around the country."*

The guidance states that the methods of engagement should reflect the nature of the project and the potential level of impact that it could have on a community. Throughout the consultation process the Applicant has had regard to the Code of Practice for Wind Energy

including the practical steps that wind farm promoters should comply with in engaging with communities as set out in this Guidance.

Extensive community consultation has been undertaken since as far back as 2023 and a Community Liaison Officer (Kieran O'Byrne, Stakeholder Engagement / Communications Manager, RWE Renewables Ireland Limited) was appointed when the Proposed Project was initially proposed.

The Applicant appointed the Community Liaison Office (CLO) to engage with the public throughout the development of the Proposed Project as a whole. The CLO was responsible for communication between the public and the Applicant's team. The CLO's role included door to door consultation with community members within 2.5 km of the Main Wind Farm Development Site, distribution of project materials to community members, follow up meetings with community members where required, liaison between local residents and the project team and communication of any project updates.

- Project information was distributed by leaflet drops to houses within a 2.5 km radius of the Main Wind Farm Development Site. Follow-up visits to households of members of the public were also undertaken where requested to discuss the details of the project.
- Public consultation was facilitated by having a dedicated CLO on the ground by way of door-to-door house calls and leaflet and letter drop to ensure locals were made aware of the details of the Proposed Project and processes involved.
- Dedicated contact details were provided with circulated materials so members of the public could directly contact the project team. This process was commenced as early as possible in order to inform the design of the Proposed Project and to inform the EIA process.
- A dedicated website was also set up to allow for further open communication between the Applicant and community throughout the iterative design process and run-up to the application submission.
- Observations and issues that arose during the scoping and consultation process have informed the design, assessment and mitigation measures proposed as part of this Proposed Project. Of significance here is movement of turbines and associated infrastructure during the design evolution.

Please also refer to **Chapter 1 and Chapter 3** of the accompanying EIAR for further detail.

4.9 Regional Planning Policy

4.9.1 Regional Spatial & Economic Strategy for the Northern and Western Region (NWRSES)

The Regional Spatial and Economic Strategy (RSES) for the Northern and Western region is a strategic plan which provides a high-level development framework for the Northern and Western Region. It provides a 12-year strategy to deliver the transformational change and regional development for the Northern and Western Region encompassing Connaught and the Ulster Counties of Cavan, Donegal and Monaghan.

The principal statutory purpose of the NWRSES is to support the implementation of Project Ireland 2040 – National Planning Framework and National Development Plan and the economic policies of the Government by providing a long-term strategic planning and economic framework for the development of the Regions.

The NWRSES provides a concept of a 'Growth Framework' that links strategic and operational challenges with prioritised capital interventions. The Framework will identify metrics which will link with National Strategic Outcomes in the NPF. Growth Ambition 5 looks at infrastructure and enabling the region through the provision of prudently managed infrastructure to deliver connected, and environmentally sustainable regions.

The following Regional Policy Objectives (RPO) are of relevance to onshore wind farms:

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 4.18 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.

The Proposed Project will aid in meeting the objectives set out in the RSES including diversification of the rural economy, actions against climate change and the sustainable development of wind energy at an appropriate location.

The Proposed Project will support the delivery of objectives set out in the RSES including diversification of the rural economy, actions against climate change and the sustainable development of wind energy at an appropriate location. The Proposed Project will support the overall transition to a low carbon society as set out in the RSES. The Proposed Development will provide a 13no. turbine wind farm capable of generating an estimated 74.1 MW and 91 MW of power (for assessment to evidence the predicted benefits) by means of renewable technology, therefore, contributing to Regional Strategic Outcomes (RSO) 9 of the RSES.

4.10 Local Planning Policy

4.10.1 Mayo County Development Plan 2022-2028

The Mayo County Development Plan 2022-2028 (MCDP) which came into effect on 29th June 2022, sets out the Council's proposed policies and objectives for the development of the County over the Plan period.

Within Section 2.2 'Vision of County Mayo' in Chapter 2 'Core and Settlement Strategy', the importance of sustainable development in County Mayo is envisioned as:

> *'To create a sustainable and competitive county that supports the health and well-being of the people of Mayo, providing an attractive destination, as a place in which to live, work, invest, do business and visit, offering high quality employment and educational opportunities within strong and vibrant sustainable communities, whilst ensuring a transition to a low carbon and climate resilient county that supports high environmental quality*.'

The MCDP outlines that, Mayo County Council *recognises the importance of onshore and offshore wind energy as a renewable energy source and its role in meeting Ireland's national energy targets* and *that the Council will endeavour to continue to facilitate wind energy projects that accord with the Mayo RES, the Landscape Appraisal of County Mayo and relevant Section 28 ministerial guidelines*.

The MCDP contains a number of policies and objectives which promote the provision of renewable energy development in the County. This section provides an overview of compliance with key planning policy and related objectives in the MCDP, furthermore, Appendix 1 of this document provides a list of each policy and objective as it relates to each topic. For detailed analysis under each topic please refer to the respective chapters of the accompanying EIAR.

4.10.1.1 Renewable Energy Strategy (RES) (Volume 4 of the CDP)

Volume 4 of the MCDP provides a Renewable Energy Strategy for the County with a strategic aim:

> **"***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***."**

The plan underlines the importance of natural resources to the local economy, promoting rural development in areas like agriculture, tourism, and renewable energy. It specifically recognizes north-west Mayo's potential in wind, ocean wave, tidal, and hydroelectric resources, setting a wind energy target of 600 MW to meet current and future energy needs.

Mayo County Council supports onshore and offshore wind energy projects, in line with Ireland's national energy goals and environmental guidelines. Wind energy, a significant contributor to Ireland's renewable electricity, is central to the plan's objectives. The development plan includes policies to harness wind energy for decarbonizing the county, encouraging wind and solar projects to reduce carbon emissions and support emerging energy technologies.

The Renewable Energy Strategy for County Mayo incorporates maps identifying areas as suitable for particular energy development. Map 1, 'Wind Energy', classifies potential areas for onshore wind energy development, among 4 classifications:

- Priority Areas are areas which have secured planning permission and where onshore 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.

Under the Renewable Energy Strategy, the Main Wind Farm Development Site is located within an area identified as a Tier 1-Preferred (Large Wind Farms) area. Such areas are stated as having the greatest potential for large wind farms.

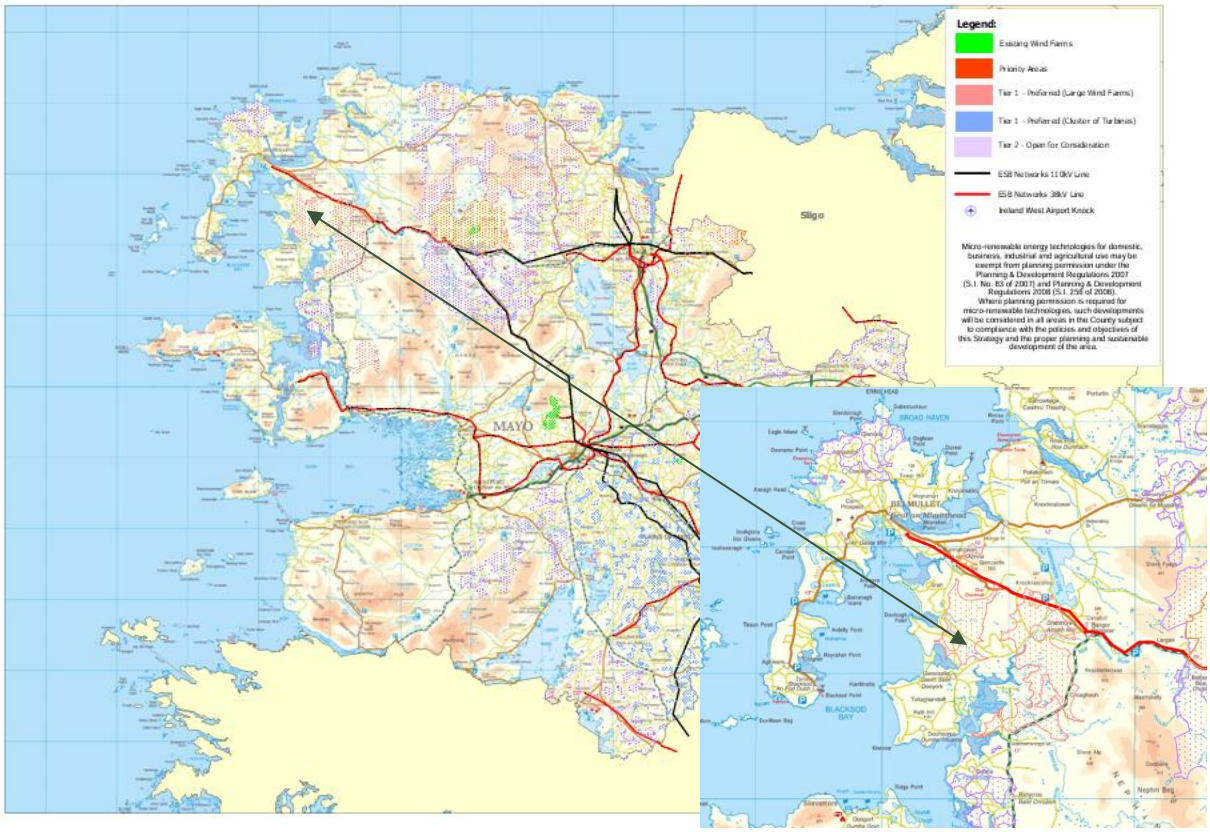

Figure 1: Extract from Map 1 Wind Energy: Mayo Renewable Energy Strategy. Site location denoted by arrows located in Tier 1 Priority Area.

4.10.1.2 Draft Renewable Energy Strategy for County Mayo (Draft RES)

On Tuesday, April 28, 2026, Mayo County Council initiated a public consultation for the 'Draft Renewable Energy Strategy for County Mayo (Draft Variation no. 2) of the Mayo County Development Plan 2022-2028. The consultation period will remain open until May 26, 2026, following which Mayo County Council is required to evaluate the submissions received and may revise the Draft RES as necessary. The Draft RES states that:

"*undertaking of the Renewable Energy Strategy for County Mayo at this juncture is somewhat premature, pending the roll-out of the Regional Renewable Energy Strategy and the allocation of renewable electricity capacity targets for each County. Notwithstanding the forthcoming policy adjustments that will be required as a result of the aforementioned, this Renewable Energy Strategy for County Mayo will take a careful approach.*"

The Draft RES includes an updated wind energy classification map 6.10, entitled 'Wind Suitability Mapping', which identifies three wind energy classifications: 'Open for Consideration', 'Repowering Potential', and 'Unsuitable'. It should be noted that the Proposed Project, and indeed the predominance of County Mayo, is now located in an area that is proposed to be classified as 'Unsuitable' for wind energy development. This is not in line with national or regional policy. The current RES identifies several wind energy classifications,

with the Proposed Project currently located within a 'Tier 1 – Preferred (Large Wind Farms)' designation.

In terms of the rationale underpinning the proposed wind suitability mapping, the Draft RES indicates that a LARES methodology was utilised to produce the revised 'Wind Suitability Mapping' (refer to Map 6.10 of the Draft RES). Within this methodology, several landscape and visual constraints are identified as informing the mapping exercise, including 'Atlantic Coastal Landscapes', the 'Wild Atlantic Way Route and Discovery Points', 'Scenic Routes and Designated Views', and 'Sensitive Landscape Areas (Policy Areas 1–3)'.

It is important to note, however, that the current RES for County Mayo undertook a comparable constraints-based analysis to produce the existing Renewable Energy Potential Mapping. Indeed, the current RES references many of the same landscape and visual constraints, including "designated natural heritage areas, built heritage, scenic views/routes, cycle/walking routes and populated areas and infrastructure constraints". As such, the principal landscape and visual considerations underpinning both the current and Draft RES documents have not changed, with no clear justification for the amendments made.

Of particular importance in this regard is the fact that these identified landscape and visual constraints remain unchanged between the preparation of the current RES and the Draft RES. Indeed, the receiving landscape itself, including its inherent character, scenic qualities and susceptibility to change, has not been altered during the intervening period between the adoption of the current RES and the publication of the Draft RES. Similarly, the principal scenic routes, designated views, heritage landscapes and broader landscape sensitivities that informed the earlier mapping exercise remain the same.

Despite this, the resultant wind suitability mapping contained within the Draft RES differs considerably from the current RES mapping, with extensive areas previously identified as suitable or preferred for wind energy development now reclassified as 'Unsuitable'. This substantial contrast in mapping outcomes is difficult to reconcile when considering that the baseline landscape and visual constraints informing both assessments are unchanged. In this respect, the considerable variation between the two mapping exercises raises questions regarding the robustness and consistency of the application of the LARES methodology in the Draft RES.

Indeed, if a robust and objective landscape capacity-based methodology had been consistently applied across the draft RES document, a far greater degree of continuity between it and the current (adopted) wind energy classification mapping output would reasonably be expected, particularly in circumstances where the underlying landscape baseline and key environmental constraints remain materially unchanged. The fact that the Draft RES mapping now identifies the predominance of County Mayo as 'Unsuitable' for wind energy development, despite the absence of any significant change in landscape character, scenic sensitivity or visual amenity constraints, suggests that the revised classifications are not principally driven by landscape or visual capacity considerations.

As a result, it is considered that landscape and visual amenity constraints, in and of themselves, provide limited rationale for the substantial reclassification of the site and its surrounding landscape from a 'Tier 1 – Preferred (Large Wind Farms)' designation to an 'Unsuitable' classification. In this respect, the revised classification does not appear to arise from any change in the receiving landscape baseline or from any newly identified landscape sensitivities.

It is understood that this is a draft document and will be subject to review and likely change, due to inconsistency and prematurity of the Draft Variation in relation to National Policy Objective 74 and National Policy Objective 75. National Policy Objective 74 states that

> *"Each Regional Assembly must plan, through their Regional Spatial and Economic Strategy, for the delivery of the regional renewable electricity capacity allocations*

indicated for onshore wind and solar reflected in Table 9.1 below[9], and identify allocations for each of the local authorities, based on the best available scientific evidence and in accordance with legislative requirements, in order to meet the overall national target."

National Policy Objective 75 states that

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

In seeking to apply availability of grid infrastructure as a constraint, the following Draft RES objective also runs contrary to stated National Policy Objectives within the National Planning Framework. The Draft RES objective is to

"ensure that renewable energy developments is located on/in close proximity to the national grid infrastructure."

However this is inconsistent with the States's significant investment priorities designed to improve grid capacity and availability and NPO 71 which is to

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

In the unlikely event that the draft RES in its current form is adopted by way of variation no. 2 of the MCDP prior to a decision being made on this application, the Proposed Project could be considered to materially contravene the MCDP.

Section 37 of the Planning and Development Act 2000 (as amended) gives powers to ACP to grant permission even if the proposed development materially contravenes the development plan and in particular having regard to Section 15 of the Climate Action and Low Carbon Development (Amendment) Act 2015 which imposes an obligation on public bodies, including planning authorities, to perform their functions, as far as practicable, in a manner consistent with national climate policy objectives

The Proposed Project is a RED III project of strategic national importance; it aligns with overarching national policy objectives and the Climate Action Plan 2025 in relation to the promotion of renewable energy targets within the State, addressing the current global energy crises, the need to tackle the issue of climate change and security of energy supply in the transition to renewable energy production and consumption.

4.10.1.3 Climate Action and Renewable Energy

One of the strategic aims of the MCDP is:

'*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.*'

The MCDP includes measures to lay the foundations for transitioning Mayo to a low carbon, climate resilient and environmentally sustainable economy by 2050 and outlines that Mayo has an enormous wind resource with the potential to underpin an entire new economy in the

[9] Refers to Table 9.1 Regional Renewable Electricity Capacity Allocations in the NPF

county. Referencing that the development of the extant permissions for wind and solar energy projects in the county will significantly add to Mayo's renewable energy output.

In terms of achieving wind energy targets, section 11.7.4 of the 'County Mayo Renewable Energy Target' notes that a minimum target of 600 MW over the plan period is considered achievable. The target would meet the energy demands of existing households in Mayo, as well as the proposed additional households for the county set out in the Core Strategy. To date only 381MW is connected and 184MW contracted, therefore there is a shortfall of the target. Although 149MW has been permitted, there is no guarantee these will be developed and therefore the Proposed Project is required to meet the target.

Furthermore, it is noted that wind energy is Ireland's largest and cheapest renewable electricity resource and is the second greatest source of electricity generation after natural gas. In 2018, the Sustainable Energy Authority of Ireland (SEAI) published their official 'Energy in Ireland 2018 Report, which stated that wind energy provided 85% of Ireland's renewable electricity and 30% of our total electricity demand.

The following Climate Action policy and Climate Action objectives support renewable energy projects:

MCDP Climate Action Policy (CAP) and Objectives (CAO)

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 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 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 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.

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.

The importance of wind energy to County Mayo is further reflected in the following Renewable Energy Policies and Renewable Energy Objectives:

Renewable Energy Policies (REP)

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 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 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 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.

REP 7: To promote the harnessing of wind energy to contribute toward decarbonising County Mayo, including new emerging by-product markets.

Renewable Energy Objectives (REO)

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 6: To ensure all renewable energy proposals comply with the provisions of the Mayo County Council Renewable Energy Strategy 2011-2022 (or as updated).

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 thereof or future guidelines, and ensure consistency with the provisions of RPO 4.16 and RPO 5.2(b) of the RSES (2020-2032).

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.

REO 23: To support and facilitate the achievement of the minimum renewable energy target of 600 MW 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.

4.10.1.4 Rural Economy

The MCDP notes that providing newer sources of energy benefits the local economy of County Mayo, whereby natural resources are stated as a traditional pillar of the rural economy.

This is reflected through the following Economic Development Objectives within the MCDP:

EDO 3: To continue to promote the county to attract enterprise and investment into Mayo through the Enterprise & Investment Unit and/or Local Enterprise Office, with a focus on a number of established and emerging sectors including tourism, manufacturing, marine, renewable energy, ICT, food and agri-food.

EDO 54: To facilitate rural enterprises, and resource development (such as agriculture, agrifood sector, agri-tourism, commercial fishing, aquaculture, rural tourism, forestry, bio-energy, the extractive industry, recreation, cultural heritage, marine enterprise sector, research and analysis) and renewable energy resources (such as wind/ solar/ocean energy) that are dependent on their locality in rural locations, where it can be demonstrated that the development will not have significant adverse effects on the environment, including the integrity of the Natura 2000 network, residential amenity or visual amenity. Where proposals demonstrate measures to promote environmental enhancement through improved ecological connectivity, such as measures in the Pollinator Plan, additional native species planting or blue and green infrastructure measures, these will be favourably considered.

4.10.1.5 Gaeltacht

Chapter 8 of the MCDP outlines how Mayo is home to three Gaeltacht regions: Lorras, Acaill, and Tuar Mhic Éadaigh. These areas are important from cultural, linguistic, and economic perspectives. Udaras na Gaeltachta plays a vital role in enhancing the quality of life for the Gaeltacht community. This is achieved through the provision of both economic and social infrastructure, along with employment and economic support, ensuring that the Gaeltacht community can thrive and continue to serve as the primary source of the Irish language, a dynamic and living community language.

The importance of Gaeltacht areas in County Mayo is further reflected in the following policies and objectives:

SCP 30: To support initiatives at promoting Gaeilge, the Irish language.

SCP 31: To promote and protect Mayo's heritage and culture and the advancement of the Irish Language.

SCO 21: To ensure that the Irish language and our unique linguistic heritage becomes more visible and audible and integrated into all activities in Mayo.

4.10.1.6 Electricity

Section 7.4.5.1 of the MCDP, looks at provision of a safe, secure, and reliable electricity supply and is a critical component necessary to sustain economic growth in Ireland. Ireland in recent years has been phasing out the use of fossil fuels, such as oil, natural gas, coal and peat to generate electricity, in favour of renewable energy sources, and further states that:

"Mayo County Council recognises that essential future upgrades are required to the electricity grid in the west, as outlined in Eirgrid's 'Tomorrow's Energy Scenarios 2019 System Needs Assessment' and will support Eirgrid in future programmes identifying grid solutions, in both infrastructural and technological terms, in order to facilitate the electricity targets, set out in the Government's Climate Action Plan 2019 and the National Energy and Climate Plan 2021-2030."

The following policy and objectives support the provision of electricity infrastructure and delivery of the electricity transmission network requirements of renewable energy projects.

Electricity Policies and Objectives

INP 21: To support the provision of high-quality, electricity infrastructure and development of an enhanced electricity supply, to serve the existing and future needs of the county and to facilitate new transmission infrastructure projects, including the delivery and integration of renewable energy proposals to the electricity transmission grid in a sustainable and timely manner, whilst seeking to minimise any adverse impacts on local communities and protect and maintain biodiversity, wildlife habitats, scenic amenities, including protected views and nature conservation.

INO 39: To seek the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity transmission grid, in a sustainable and timely manner.

4.10.1.7 Landscape

Volume 4 of the MCDP contains the Landscape Appraisal for the county and outlines how Mayo has a varied and unique landscape. It includes a diversity of landscape types, ranging from rolling hills and lakes to peatlands, grasslands, woodlands, eskers and wetlands.

The north-west areas of County Mayo have some of the best renewable energy resources in Europe, if not the world, in terms of wind, ocean wave, tidal and hydroelectric resources.

The Landscape Appraisal for County Mayo identifies and differentiates the landscape character of each part of the county into Landscape Character Areas and Scenic Routes and Views. The county is divided into six policy areas relating to landscape protection and capacity to absorb development. The Landscape Appraisal includes a Landscape Sensitivity Matrix that provides a general indication of the likelihood of success of planning applications for each development type, in each policy area.

The Main Wind Farm Development Site is located within Policy Area 2 – Lowland Coastal Zone, which is described within the MCDP as "This *area, despite the mildly variant terrain and land cover, has as a principle landscape factor a visual association with the coastline. The lowland coast is considered a separate core policy area, in relation to the other steeper coastal area, as it has significantly different landscape attributes, sensitivities and robustness."*

The following are policies for Policy Area 2:

Policy 8: Recognise the substantial pockets of residential and rural landuses in some locations and the emerging pressures for differing landuses of industry, wind energy and residential development in this policy area.

Policy 9: Continue to facilitate appropriate development in a progressive and clustered manner that respects the scale, character and sensitivities of the landscape.

Policy 10: Recognise that in this low-lying open environment, tall and bulky development can have a disproportionate impact against the landscape when viewed from the predominantly low-lying areas of the public realm.

Policy 11: Encourage development that will not have a disproportionate effect on the existing character of the landscape in terms of location, design, and visual prominence.

The following landscape policies and objectives are of relevance to the Proposed Project:

NEP 14: To protect, enhance and contribute to the physical, visual and scenic character of County Mayo and to preserve its unique landscape character.

NEO 25: To consider applications for development, along Mayo's Scenic routes, that can demonstrate a clear need to locate in the area concerned, whilst ensuring that it:

- Does not impinge in any significant way on the character, integrity and distinctiveness of the area.
- Meets high standards in siting and design.
- Contributes to and enhances local landscape character.
- Satisfies all other criteria, with regard to, inter alia, servicing, public safety and environmental considerations. Rural housing applications along Scenic Routes must comply with the requirements set out in Objective RHO 3 (Chapter 3).

NEO 26: To consider applications for development, within Mayo's Coastal Areas and Lakeshores and within areas along scenic routes with designated scenic views, that can demonstrate a long-standing social link to the area concerned, whilst ensuring that it:

- Does not impinge in any significant way on the character, integrity and distinctiveness of the area.
- Cannot be considered at an alternative location.
- Meets high standards in siting and design.
- Contributes to and enhances local landscape character.
- Satisfies all other criteria, with regard to, inter alia, servicing, public safety and environmental considerations. Rural housing applications along Coastal Areas and Lakeshores must comply with the requirements set out in Objective RHO 4 (Chapter 3).

NEO 27: To ensure all development proposals are consistent with the Landscape Appraisal of County Mayo and the associated Landscape Sensitivity Matrix and future editions thereof.

NEO 29: Require a Landscape/Visual Impact Assessment to accompany significant proposals, located within or adjacent to sensitive landscapes, where appropriate.

4.10.1.8 Cultural and Amenity Tourism Policy Objectives

Mayo's Tourism Strategy, Destination Mayo 2016-2021, identifies tourism as a key economic sector for Mayo, with the potential for significant job creation. Its vision is to develop Mayo as a premier tourism destination, in conjunction with world-class activities, exceptional heritage attractions, cultural attractions and high-quality experiences attractive to domestic and international visitors alike.

The tourism strategy highlights that Mayo has:

"*significant potential for a new high quality, innovative product development, ranging from the Wild Atlantic Way, Monasteries of the Moy Greenway, expansion of the highly successful Great Western Greenway, Blueway Water Trails, VeloRail, Wild Nephin Wilderness Park and the Mary Robinson Centre in Ballina. Initiatives such as interpretation of the Sacred Landscape, Pilgrim Trails across the county, the famine history of Mayo and facilities for adventure activities both land and water-based, offer unique ways for a wide range of visitors to engage with Mayo's landscape, heritage and people".*

The Wild Atlantic Way

Section 2.5.1 of the MCDP 2022-2028 emphasizes the significance of the Mayo Coastal Zone Corridor, acknowledging that the vast coastline is among the most precious and delicate resources in the county, supporting a wide range of related industries that yield considerable economic output. The Wild Atlantic Way represents an initiative that has highlighted how the natural allure of this landscape has aided the county's economic growth in recent years. Mayo presents a wealth of opportunities as a tourism destination, with immense potential to further enhance its tourism sector as a vital component of its economy. The county's distinctive wild and pristine landscapes are seen as a key element of its tourism appeal along The Wild Atlantic Way. The nearest wind turbine within the Main Wind Farm Development Site is located c.1 km north of the L1205. The L1205 is included in the Wild Atlantic Way route. The Wild Atlantic Way is a coastal touring route comprising 2,500 km of coastline, 15 signature discovery points and 172 discovery points. The two closest signature discovery points are Keem Bay on Achill Island and Downpatrick Head. The closest discovery point is at An Ceann Ramhar (Doohoma Head) (4 km) and Oileán Chloigeann (Claggan Island) (5 km). **Chapter 10** of the accompanying EIAR assesses likely significant effects of the Proposed Project on these features and concludes that:

"*Overall, the significance of landscape effects during the operational phase is considered to be Substantial-Moderate / Negative / Long-term within and immediately around (c. <1 km) the Proposed Development Site (Not Significant in the context of the EIA Regulations). Thereafter, the significance will reduce to Moderate, Slight, and Imperceptible at increasing distances, as the development becomes a progressively smaller component of the wider landscape fabric, even in the context of higher-sensitivity landscape units and features (Not Significant in the context of the EIA Regulations).*

In terms of residual visual effects, the proposed turbines will be a dominant built feature for the nearest surrounding visual receptors, which principally include local community receptors, as well as tourism, amenity, and heritage receptors (the WAW). The turbines will be a defining built feature from the nearest local road (the L5252 that runs through the Proposed Development Site) and will contribute to a marked increase in the intensity and scale of development in this area.

Nevertheless, while the central and wider study area includes some High–Medium and High visual receptors, the proposed turbines are generally viewed in the opposite direction to the main aspect of visual amenity from these receptors or, where visible, will appear in a legible manner without blocking or heavily obstructing views of any highly sensitive landscape features or areas".

The Wild Nephin National Park

This Park is an integral component of the Owenduff/Nephin Complex Special Area of Conservation (SAC) and Special Protection Area (SPA). Spanning an impressive 15,000 hectares of untouched and pristine wilderness, the Park is characterized by the Nephin Beg Mountain range. Within its boundaries lies the Owenduff Bog, recognized as one of the last remaining intact active blanket bog systems in Western Europe. A significant portion of the Owenduff catchment is designated as a Ramsar Convention site. The National Park supports vital habitats and species, including alpine heath, upland grassland, heath, lakes, and river catchments.

Additionally, the National Park is home to Ireland's inaugural International Dark Sky Park, the Mayo Dark Sky Park, which has been officially certified as a Gold Tier standard International Dark Sky Park. This designation encompasses the entirety of the National Park, revealing some of the darkest, unspoiled night skies globally. Numerous walking trails are available within the park, including the Bangor Trail and Western Way, alongside archaeological and heritage landscapes.

The Wild Nephin National Park plays a significant role in the natural heritage of the county and is a key contributor to the tourism offerings along the Wild Atlantic Way. The National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) acknowledge the growing tourism potential of Mayo's Dark Sky Reserve at Wild Nephin National Park as an alternative tourism experience.

The following tourism policies and objectives are of relevance to the Proposed Project:

TRP 6: To promote and support the continued strategic development of Westport, Ballina and Castlebar as tourist destinations through:

d. *Promote the significant tourism potential of Ballina and its location as a prominent stop on the Wild Atlantic Way, a gateway to north-west Mayo, the Céide Fields, and internationally renowned salmon fishing, through investment in tourism related infrastructure, including Monasteries of the Moy Greenway from Belleek to Killala, incorporating EuroVelo1 Atlantic Coastal Route, Mountain Biking Trail via Ballina connecting the Wild Nephin Ballycroy National Park to the National Mountain Bike Trail at Coolaney and ongoing development of the Wild Atlantic Way, including Discovery Points at Crockets Town*.

TRP 15: To support the implementation of the opportunities and actions identified in the Mayo Tourism Strategy and Action Plan – Destination Mayo 2015-2021, SEA and AA, regarding the development of cultural and amenity tourism and the Wild Atlantic Way in Mayo, in conjunction with the Tourism section of Mayo County Council and other relevant stakeholders.

TRP 27: To support the promotion of the Wild Atlantic Way in its role to grow the economic contribution of tourism along its route, through the upgrade and improvement of the touring network, facilities and visitor attractions through:

a. Exploration of the development of signature discovery points to assist and secure Mayo's position as 'The Heartbeat of the Wild Atlantic Way'.

c. Working with relevant landholders and recreational/tourism agencies to increase access to the countryside and our coastal areas, and to ensure maintenance and access to the existing network of trails, paths, and tourist sites along the Wild Atlantic Way.

d. Supporting the exploration of the development of new tourist services, parking and facilities or upgrading/extension of existing tourist services, parking and facilities at tourist sites along the Wild Atlantic Way.

e. Build the concept of sustainability firmly into ongoing planning processes for tourism and outdoor recreation. In conducting tourism and recreation planning processes during the lifetime of the Mayo CDP, work towards adopting an ecosystem-based approach that assesses capacity of landscapes, communities, and natural resources to provide a basis for decision making that is firmly based on the principles of sustainability.

TRO 8: To investigate the further potential of the Wild Nephin Ballycroy National Park and Dark Sky initiative in a sustainable manner. This approach should demonstrate good practice in terms of eco-tourism and wilderness and seek to gain recognised accreditation on same.

TRO 11: To utilise Mayo's natural and heritage resources to foster the development of tourism as a viable sustainable sector of the economy, in a sustainable manner, which complements the scale, quality and unique features of the county.

The Proposed Development is c.30 km north-west of the Ballycroy Visitor Centre at Wild Nephin National Park. **Chapter 10** of the accompanying EIAR assesses likely significant effects of the Proposed Project on the Wild Nephin National Park, and concludes the following;

"*Overall, the residual significance of visual effect during the operational phase at receptors assessed within the study area is considered to range between **Substantial-Moderate** to **Slight-imperceptible**, whilst the quality of effect is deemed **Negative**. It should also be noted that considerable parts of the study area will have no visibility of the proposed turbines as set out in the ZTV maps provided above. Indeed, these areas include extensive parts of the western coastline along the Belmullet and in the northern extent of the study area. Similarly broad expanses of the wider eastern and south-eastern aspects of the study area in the surrounds of Wild Nephin National Park will afford no visibility of the Proposed Development. These parts of the study area where no visibility of the proposed turbines can be afforded will experience **Imperceptible** visual effects."*

4.10.1.9 Natural Environment Objectives

The MCDP outlines that Mayo boasts a diverse array of ecosystems and rich biodiversity, encompassing its geology, extensive peatlands, wetland landscapes, rivers, woodlands, grasslands, eskers, trees, and hedgerows. Safeguarding and enhancing our biodiversity and ecosystems are crucial not only for the health, well-being, tourism, attractiveness of the area, and quality of life of our communities today, but it is also essential for the future, particularly in adapting to and mitigating climate change. Climate change poses a threat to biodiversity

and ecosystems, diminishing their ability to capture and store carbon. The effects of climate change frequently worsen other pressures on biodiversity and ecosystems, including pollution, over-exploitation, invasive species, habitat fragmentation, degradation, and loss. Consequently, it is imperative to curb biodiversity loss and sustain diverse, functioning, and interconnected ecosystems throughout the broader terrestrial, freshwater, and marine environments, in order to climate-proof our natural surroundings. Mayo County Council holds a responsibility and legal duty to protect biodiversity and ecosystems. The county is rich in biodiversity; however, contemporary development and infrastructure demands have resulted in the fragmentation of habitats and commuting corridors, adversely affecting biodiversity. Road networks, large-scale industrial, retail, and residential developments have led to habitat fragmentation, species loss, and a weakening of the green infrastructure network. It is vital to ensure that existing habitats are preserved by integrating natural features such as trees, hedgerows, woodlands, and watercourses into development proposals to avert biodiversity loss and enhance a sense of place, wherever feasible.

The following natural environment policies and objectives are of relevance to the Proposed Project:

NEO 3: To ensure the unique ecological, scenic, recreational and environmental character of the Wild Nephin Ballycroy National Park is protected and enhanced and developed appropriately.

NEO 11: To ensure that the impact of development within or adjacent to national designated sites, Natural Heritage Areas, Ramsar Sites and Nature Reserves likely to result in significant adverse effects on the designated site is assessed by requiring the submission of an Ecological Impact Assessment report (EcIA), Environmental Report (ER), an Environmental Impact Assessment Report (EIAR), if deemed necessary, and/ or a Natura Impact Assessment (NIS), if deemed necessary, prepared by a suitably qualified professional, which should accompany planning applications.

The Proposed Project will support the overall objectives of the MCDP in providing wind energy development in accordance with national policy and guidelines. It will contribute to ensuring energy supply in the county with the potential to provide an estimated 74.1 MW and 91 MW of power (for assessment purposes).

The Main Wind Farm Development Site is located within an area identified as a Tier 1-Preferred (Large Wind Farms) area. Such areas are stated as having the greatest potential for large wind farms.

Chapter 10 of the accompanying EIAR 'Landscape and Visual', concluded that; "*it is considered that the Proposed Project will result in a marked degree of change within its immediate surrounding context with regard to both landscape and visual receptors. However, a key consideration in this instance is the wind energy classification for the Main Wind Farm Development Site, which is designated in the County Mayo RES as 'Tier 1 – Preferred (Large Wind Farms)' and is described as "areas in which the potential for large wind farms is greatest".*

The Proposed Project complies with the various policies and objectives aimed at fostering renewable energy development within the County. Economic development policies, along with objective EDO 54 and EDO 69, advocate for renewable energy resources and initiatives. Additionally, INP 21 and INO 39 facilitate the establishment of electricity infrastructure and the fulfilment of electricity transmission network requirements for renewable energy projects. Policy CAP 9 and objective CAO 1 endorse the utilization and provision of renewable energy resources. Furthermore, policies REP 1, REP 3, and REP 7 promote the advancement of renewable energy infrastructure, while objectives REO 3 encourage energy production, REO 6 aims for adherence to the MCC Renewable Energy Strategy, and REO 8 and REO 23 support the development of wind energy and the attainment of a renewable energy target of 600 MW for the county throughout the duration of the plan.

With respect to the Draft RES, the publication of this document, by Mayo County Council's own admission, is premature in the absence of the revised target figures from the RSES as required by NPO 74 and 75. Furthermore, the fact that the Draft RES mapping now identifies the predominance of County Mayo as 'Unsuitable' for wind energy development, with limited rationale for the substantial reclassification of the site and its surrounding landscape from a 'Tier 1 – Preferred (Large Wind Farms)' designation to an 'Unsuitable' classification is unfounded. It is submitted that the landscape character assessment to which the current RES applies has not changed and as such the Main Wind Farm Development Site remains suitable for wind energy development. It is also understood that at the time of writing this report the existing Mayo RES remains in force.

In the event that the Draft RES in its current form is adopted by way of variation no. 2 of the MCDP prior to a decision being made on this application, the Proposed Project could be considered to materially contravene the MCDP. Section 37 of the Planning and Development Act 2000 (as amended) gives powers to ACP to grant permission even if the proposed development materially contravenes the development plan.

The SID process was developed to ensure developments in the national interest or otherwise benefitting from wider policy support importance can be granted permission, even if they contravene overly restrictive local policy. As such, we respectfully submit that planning permission should be granted for this application. In light of the Coolglass decision (Coolglass Wind Farm Limited v An Coimisiún Pleanála [2026] IESC 5), we also submit that the Comisiun is required to comply with S.15 of the Climate Action and Low Carbon

Development Act 2015 as amended which requires inter alia, ACP to perform its functions in a manner consistent with ”(a) the most recent approved climate action plan, (b) the most recent approved national long term climate action strategy, (c) the most recent approved national adaptation framework and approved sectoral adaption plans (d) the furtherance of the national climate objective and (e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.”

Please refer to **Appendix 1** for further details.

4.10.1.10Cultural Policy Objectives

Chapter 9 of the MCDP looks at cultural heritage, where the Council aims to, “*Mayo County Council seeks to ensure the protection and conservation of our rich built heritage throughout the county, where it is warranted, along with the sustainable growth of our towns and villages, with particular emphasis on the regeneration and revitalisation of town and village centres.*”

It is a policy objective of Mayo County Council to:

BEP 1: To support and promote the protection, appropriate management and sympathetic enhancement of the county’s archaeological heritage within the Plan area, in particular by implementing the Planning and Development Act 2000 (as amended) and the National Monuments Act 1930 (as amended).

BEP 2: To promote awareness of and encourage the provision of access to, the archaeological resources of the county.

BEP 3: To encourage the management and maintenance of the county’s archaeological heritage, including historic burial grounds, in accordance with best conservation practice that considers the impact of climate change.

BEO 1: To protect the archaeological heritage and sites identified in the Record of Monuments and Places, National Monuments in the ownership or guardianship of the State in addition to National Monuments that are the subject of Preservation Orders, and to safeguard the integrity of the archaeological sites in their setting.

BEO 4: To ensure that development in the vicinity of a Recorded Monument or Zone of Archaeological Potential is sited and designed in a sensitive manner, avoiding adverse effects on landscape setting and context of monument.

BEO 5: To protect all sites and features of archaeological interest discovered subsequent to the publication of the Record of Monument and Places, in situ (or at a minimum preservation by record), having regard to the advice and recommendations of the National Monuments Service of the Department of Culture, Heritage and the Gaeltacht.

BEO 6: To protect archaeological sites, monuments, underwater archaeology and archaeological objects in their setting, which are listed on the Record of Monuments and Places for Mayo.

BEO 10: To protect the setting of protected structures and seek to prevent the demolition or inappropriate alteration of Protected Structures, which would adversely impact on the character and special interest of the structure, where appropriate.

With respect to the Cultural Heritage Policy Objectives, **Chapter 12** of the accompanying EIAR, assesses the Proposed Project against the MCDP to ensure compliance with Cultural Heritage Policy objectives. This assessment found that in summary, the Proposed Project would cause no significant direct or indirect effects to heritage assets within or outside the Main Wind Farm Development Site as follows:

"Potential construction effects, resulting from direct impact upon archaeological remains, were only identified upon potential palaeo environmental materials which survive in peat. The potential for these remains to survive considering the level of land-use is low, and therefore a slight, at most, significance of effect was identified. No potential impacts were identified upon the crannog within the Site or its potential associated remains.

Potential indirect impacts from the operational phase of the wind farm were assessed. A slight significance of effect was identified to Megalithic Tomb – court tomb (MA026-002001), and no significance effects were found upon the Penal Mass Station (MA026-007000).

Overall, no potential adverse direct or indirect significant effects in the context of the EIA regulations were identified".

Based on the assessments carried out and mitigation measures outlined, the Proposed Project is in compliance with cultural heritage policies and objectives of the MCDP. Please refer to Appendix 1 for further details.

4.10.1.11 Development Management Standards

Volume 2 of the MCDP outlines development management standards for the assessment of planning applications in ensuring compliance with the Development Plan. With respect to Wind Energy, Section 8.8.1 states that:

"Planning applications for wind energy development shall be in compliance with DoEHLG Wind Energy Development Guidelines 2006 (including any new guidelines when issued) and the Renewable Energy Strategy for Mayo', for further details please refer to Table 2: Compliance with the Wind Energy Development Guidelines (2006) and Draft Wind Energy Guidelines (2019)*."*

4.11 Other Sector Relevant Policies

4.11.1 Renewable Electricity Support Scheme (RESS)

In 2025 the Government of Ireland published the 'Terms and Conditions for the Second Competition Under the Renewable Electricity Support Scheme (RESS) 5. The RESS is an auction scheme in which renewable energy projects bid for grid capacity. The noted document sets out the terms and conditions that apply to the fifth competition, RESS 5. Eligible projects under RESS include onshore wind, offshore wind, solar, hydro along with many other renewable generation methods. Should an applicant be successful under this system they will be invited to submit an offer price on their RESS project.

RESS 5 builds on all previous RESS schemes to date, with several changes introduced for this latest round.

- The T&Cs of the RESS 5 competition will follow a broadly similar approach to that of the RESS 4 competition which took place in 2024. The RESS 5 auction is planned

based on a strong delivery pipeline of sufficiently mature, grid contracted projects which are in receipt of planning permission.

- The RESS 5 T&Cs will require Generators to establish and register the Community Benefit Fund (CBF) during the construction / commissioning phase of a project and as a prerequisite to achieving COD.
- The RESS 5 T&Cs will introduce a number of changes in relation to the establishment and operation of CBFs under the scheme. Generators will be required to comply with the rules and guidance set out in the new Rulebook for Community Benefit Funds Under RESS (the Rulebook), which replaces the Good Practice Principles Handbook which was published in 2021. There will be no change to the minimum mandatory €2/MWh CBF contribution.

RESS 5 provides for a community benefit fund which will contribute €2/ MWh for renewable energy projects. . The Good Practice Principles Handbook lays out a range of principles and guidance for Generators in order to ensure the successful operation and delivery of Community Benefit Funds, including the need to ensure community participation in fund decision-making via the establishment of a local committee, which should encourage successful dispersal of funds. Generators shall comply with the principles and guidance contained in the Good Practice Principles Handbook in the context of the operation and administration of the Community Benefit Fund for their particular RESS 5 Project.

RESS 5, the fifth annual auction under Ireland's Renewable Energy Support Scheme, designed to help the country reach its 2030 goal of generating 80% of its electricity from renewable sources was held in September 2025. The auction provisionally selected 23 projects to receive a guaranteed price for their renewable energy over 15 years.

As set out in the terms of the Renewable Energy Support Scheme (RESS), all renewable energy projects must establish a Community Benefit Fund prior to commercial operations of any proposed development. RESS requires a contribution of €2/ MWh of Loss-Adjusted RESS Metered Quantity. Furthermore, the Community Benefit Fund will provide a minimum payment of €1,000 to all dwellings located within a one-kilometre radius of the project. It also states that households located outside a distance of 1 kilometre but within a distance of 2 kilometres from such RESS Projects shall receive an annual payment of an amount lower than €1,000. The amount of this payment shall decrease progressively as the distance from the RESS 5 Project increases, ensuring a proportional allocation based on proximity for all projects. The RESS Terms and conditions also set out that a minimum of 40% of the funds shall be paid to not-for-profit community enterprises, whose primary focus or aim is the promotion of initiatives towards the delivery of the UN Sustainable Development Goals.

The Applicant supports and endorses this approach to the delivery of community benefit funding and endeavours to work with local communities in a proactive and engaging way to deliver early and tangible benefits for communities in the local area.

If the Proposed Development is successful in receiving planning consent, RWE Renewables (Ireland) Ltd, will apply for support for a community benefit fund through the RESS process. Under CAP25, it is understood that a community benefit fund will have to be set up irrespective of whether the Proposed Development participates in the RESS process. The community benefit fund for non-participating projects should be equivalent to the RESS requirements of €2/MWh.

The Community Benefit Fund for the local area, assuming the export capacity will be c. 74.1-91 MW (based on the proposed layout and working assumptions) which if developed under RESS will be c. €453,768 to €558,012 per year for the communities in the local area for the duration of the Proposed Development.

To put this in perspective, €2.5 million would become available within the first 5 years of operation and €5 million within 10 years with a total funding allocation of in the region of €7.5 million being delivered within 15 years of operation. The community benefit fund is further detailed in **Chapter 4** of the accompanying EIAR.

5.0 Summary and Conclusion

5.1 Material Planning Considerations

European Policy, seeks to push for continued progress towards net-zero economy and to build a secure energy system that ensures affordable energy for all consumers and increase the security of supply of the EU's energy supply. In line with EU targets, Ireland aims to reduce net greenhouse gas emissions by at least 55% by 2030 and the share of renewable energy in the energy mix by 2030 increasing to a minimum of 42.5%.

There is an overarching requirement to facilitate renewable energy development in particular onshore wind energy in order to meet targets in the Climate Action Plan 2025. These legally binding objectives are set out in the 'Climate Action and Low Carbon Development (Amendment) Act 2021'. This Act established legally binding frameworks and commitments to achieve targets.

All planning applications are determined on their individual merits with due consideration given to the overall planning balance of a scheme.

The Proposed Development, if granted, will contribute to the supply of national demand for renewable energy which will add to the national objectives of decarbonising to combat the climate emergency and add to the energy security of supply crisis we are currently experiencing.

This Planning Statement contains a comprehensive planning assessment of the Proposed Project. Our assessment notes that the Proposed Project is compliant with International, European, and National policy on energy security, emissions reductions and renewable energy production. The Proposed Project is also in compliance with local policies in the Mayo County Development Plan 2022-2028.

Likely significant effects have been assessed in the EIAR and NIS through the process of assessment, embedded mitigation, and additional proposed mitigation in the EIAR, the NIS and Construction Environmental Management Plan (CEMP). It has been demonstrated that the Proposed Project can be constructed, operated, and decommissioned without any significant effects arising on the environment.

It is considered that the Proposed Project meets all criteria discussed in Section 4.0 of this Planning Statement.

Chapter 4 of the accompanying EIAR discusses the community benefit fund and how the community team has engaged with the local community. The developer has undertaken significant consultation in this regard in compliance with the Community Benefit Fund Good Practice Principles published in 2021, the Best Practice Guidelines for the Irish Wind Energy Industry and the IWEA Best Practice Principles in Community Engagement and Community Commitment 2013.

5.2 Conclusion

This Planning Statement has set out the rationale for the 'Proposed Project' and has assessed compliance with relevant national and international legislation and policy.'

The policy as described throughout this report sets out significant international, European, national, regional, and local policy support for a move to renewable energy technologies and a reduction in greenhouse gas emissions. Ireland is committed to meeting International and European targets.

While Ireland has come a long way in increasing renewable energy generation, the targets are ever increasing from a European perspective. 2050 European targets effectively mean that Europe's energy production will have to be almost carbon-free by 2050. The Climate Action Plan 2025 sets out to increase the proportion of renewable electricity to 80% by 2030. Notably Section 11, 'Electricity' provides a Key Performance Indicator (KPI) of providing 9 GW Onshore wind by 2030. The emissions reduction targets by sector to 2030 for the Electricity Sector are also set at 25-75%.

Therefore, there is a clear national mandate to accommodate significant onshore wind within the next decade. Furthermore, the National Planning Framework emphasises a move to a low-carbon economy to reduce Ireland's carbon footprint by integrating climate action into the planning system in support of national targets. It is this commitment on energy and climate policy that justifies a clear need for renewable energy generation in Ireland. It is recognised a range of renewable resource alternatives are needed to meet our International and European commitments, however onshore wind is an established sector and economically competitive. It is also a proven technology that will be critical to meeting the near-term renewable targets up to 2030.

We respectfully request that An Coimisiún Pleanála give due regard to national objectives and Climate Action Plan 2025 to support wind energy development as part of the International, European, and National binding policies to increase the use of renewable energy and grant permission for the Proposed Development in this instance.

References

- *Climate Action and Low Carbon Development (Amendment) Act 2021* (No. 32 of 2021). Dublin: The Stationery Office. Available at: https://www.irishstatutebook.ie/eli/2021/act/32/enacted/en/print (Accessed: 11 February 2026).
- Department of Climate, Energy and the Environment (2025) *Climate Action Plan 2025*. Dublin: Government of Ireland. Available at: https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/climate-action-plan-2025/ (Accessed: 11 February 2026).
- Department of Environment, Climate and Communications (2021) *Policy Statement on Security of Electricity Supply*. Dublin: Government of Ireland. Available at: https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/policy-statement-on-security-of-electricity-supply/ (Accessed: 11 February 2026).
- Department of the Environment, Climate and Communications (2022) *Review of the security of energy supply of Ireland's electricity and natural gas systems.* Available at: https://www.gov.ie/en/department-of-climate-energy-and-the-environment/consultations/review-of-the-security-of-energy-supply-of-irelands-electricity-and-natural-gas-systems/ (Accessed: 11 February 2026).
- Department of the Environment, Climate and Communications (2023) *Energy Security in Ireland to 2030*. Dublin: Government of Ireland. Available at: https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/energy-security-in-ireland-to-2030/ (Accessed: 11 February 2026).
- Department of Housing, Local Government and Heritage (2025) *National Planning Framework – First Revision*. Dublin: Government Publications. Available at: https://www.npf.ie/ (Accessed:11 February 2026).
- Department of Public Expenditure, NDP Delivery and Reform (2021) *Project Ireland 2040: National Development Plan 2021–2030*. Available at: www.gov.ie (Accessed: 11 February 2026).
- Department of Public Expenditure, NDP Delivery and Reform (2025) *Project Ireland 2040: National Development Plan Review 2025*. Dublin: Government Publications Office. Available at: https://www.gov.ie/en/department-of-public-expenditure-infrastructure-public-service-reform-and-digitalisation/campaigns/project-ireland-2040/ (Accessed: 11 February 2026).
- Department of the Environment, Heritage and Local Government (DoEHLG) (2006). *Wind Energy Development Guidelines for Planning Authorities*. Available at: https://www.gov.ie/en/publication/05697-wind-energy-development-guidelines-2006/ (Accessed: 11 February 2026).
- Department of Housing, Planning and Local Government (2019) *Draft revised wind energy development guidelines December 2019*. Dublin: DHPLG. Available at: https://www.gov.ie/en/publication/05697-draft-revised-wind-energy-development-guidelines-december-2019/ (Accessed: 11 February 2026).
- Department of the Environment, Community and Local Government (2012) *Spatial Planning and National Roads: Guidelines for Planning Authorities*. Dublin: Stationery Office. Available at: https://www.gov.ie/en/publication/05696-spatial-planning-and-national-roads-guidelines-jan-2012/ (Accessed: 11 February 2026).
- Department of Communications, Climate Action and Environment (2016) *Code of Practice for Wind Energy Development in Ireland - Guidelines for Community Engagement*. Dublin: DoCCAE. Available at: https://www.scribd.com/document/654500731/Code-of-Practice-for-Wind-Energy-

Development-in-Ireland-Guidelines-for-Community-Engagement (Accessed: 11 February 2026).
- Department of the Environment, Climate and Communications (2025) *Renewable Electricity Support Scheme (RESS)*. Available at: https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/renewable-electricity-support-scheme-ress/ (Accessed: 11 February 2026).
- *Directive (EU) 2023/2413 of the European Parliament and of the Council of 18 October 2023 amending Directive (EU) 2018/2001* (2023) Official Journal of the European Union, L 2023/2413. Available at: https://eur-lex.europa.eu/eli/dir/2023/2413/oj (Accessed: 11 February 2026).
- European Commission (2022) *REPowerEU: joint European action for more affordable, secure and sustainable energy*. Available at: https://ec.europa.eu/commission/presscorner/detail/en/IP_22_3131 (Accessed: 10 February 2026).
- European Commission (2024) *Commission Recommendation (EU) 2024/1343 of 13 May 2024 on speeding up permit-granting procedures for renewable energy and related infrastructure projects*. Available at: https://energy.ec.europa.eu/publications/recommendation-and-guidance-speeding-permit-granting-renewable-energy-and-related-infrastructure_en (Accessed: 11 February 2026).
- Ireland (2025) *European Union (Planning and Development) (Renewable Energy) Regulations 2025*. S.I. No. 274 of 2025. Dublin: Stationery Office. Available at: https://www.irishstatutebook.ie/eli/2025/si/274/made/en/print (Accessed: 11 February 2026).
- Irish Wind Energy Association (2013) *Good Neighbour: IWEA Best Practice Principles in Community Engagement and Community Commitment*. Naas: IWEA. Available at: https://windenergyireland.com/images/files/9660bd0afdf6072c39.pdf (Accessed: 11 February 2026).
- Mayo County Council (2022) *Mayo County Development Plan 2022-2028*. Available at: https://www.mayo.ie/planning/county-development-plans/2022-2028 (Accessed: 11 February 2026).
- Northern and Western Regional Assembly (2020) *Regional Spatial & Economic Strategy 2020-2032*. Available at: https://www.nwra.ie/rses/ (Accessed: 11 February 2026).
- *Planning and Development Act 2000*, No. 30/2000, Dublin: Stationery Office, available: https://www.irishstatutebook.ie/eli/2000/act/30/enacted/en/html [Accessed 11 February 2026].
- Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 (European Climate Law), (2021) *Official Journal of the European Union*, L 243/1. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32021R1119 (Accessed: 11 February 2026).
- United Nations Framework Convention on Climate Change (2015) Adoption of the Paris Agreement, 21st Conference of the Parties. Available at: https://unfccc.int/resource/docs/2015/cop21/eng/l09r01.pdf (Accessed: 11 February 2026).
- United Nations (1997) *Kyoto Protocol to the United Nations Framework Convention on Climate Change*. Available at: https://unfccc.int/resource/docs/convkp/kpeng.pdf (Accessed: 11 February 2026).

- United Nations Framework Convention on Climate Change (2015) *Paris Agreement to the United Nations Framework Convention on Climate Change*. Available at: https://unfccc.int/process-and-meetings/the-paris-agreement (Accessed: 11 February 2026).
- United Nations Framework Convention on Climate Change (2019) *Chile/Madrid Time for Action, Decisions adopted by the COP25*. Available at: https://unfccc.int/cop25/decisions (Accessed: 10 February 2026).
- UNFCCC (2021) *Glasgow Climate Pact - Decision -/CP.26*. Bonn: UNFCCC. Available at: https://unfccc.int/documents/310475 (Accessed: 11 February 2026).
- UNFCCC (2022) *Decision -/CP.27 Sharm el-Sheikh Implementation Plan*. Bonn: UNFCCC. Available at: https://unfccc.int/sites/default/files/resource/cop27_auv_2_cover%20decision.pdf (Accessed: 11 February 2026).
- UNFCCC (2023) *Outcome of the first global stocktake: Decision -/CMA.5*. Available at: https://unfccc.int/sites/default/files/resource/cma2023_L17_adv.pdf (Accessed: 11 February 2026).
- United Nations Framework Convention on Climate Change (2024) *About COP 29 - Baku, Azerbaijan*. Available at: https://unfccc.int/cop29 (Accessed: [Insert Date, e.g., 10 February 2026]).
- UNFCCC, 2025. *Belém Climate Change Conference - November 2025: Key outcomes agreed at the UN climate talks in Belém*. Bonn: UNFCCC. Available at: https://unfccc.int/cop30 [Accessed 10 February 2026].
- Mayo County Council, 2026: Proposed Draft Variation No.2 Mayo County Development Plan 2022-2028 - Renewable Energy Strategy. Available at: https://consult.mayo.ie/en/consultation/proposed-draft-variation-no2-mayo-county-development-plan-2022-2028-renewable-energy-strategy.

Appendix 1: Table 3 - Mayo County Development Plan Compliance

Table 3: Mayo County Development Plan Compliance Table

Topic	Policy	Summary	Compliance
Renewable Energy Strategy	**Tier-1 Preferred (Large Wind Farms) Area**	Preferred (Large Wind Farms) are areas in which the potential for large wind farms is greatest.	In compliance. The Main Wind Farm Development Site is located within a Tier-1 area.
Climate Action & Renewable Energy	**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.	In compliance. It is estimated for the purpose of climate assessment that the Proposed Project will provide between 74.1 MW and 91 MW (for assessment purposes) of renewable energy, reducing the need for greenhouse gas producing fossil fuels.
	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.	In compliance. The Proposed Project is a renewable energy source, which will make use of wind energy in an environmentally acceptable manner.
	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.	In Compliance. The Proposed Project supports the increasing of renewable energy solutions, thus supporting a low carbon economy.
	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	In compliance. The Main Wind Farm Development Site is located within a Tier 1 (Preferred) area and will provide a renewable energy source in line with national

Topic	Policy	Summary	Compliance
		amenities, so as to provide for further residential and enterprise development within the county.	policy which will not have a negative impact on the surrounding environment as outlined in the accompanying EIAR.
	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.	In compliance. The Proposed Project will support the transition to a Low Carbon Energy Future.
Renewable Energy Policies	**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.	In compliance. The Main Wind Farm Development Site is located within a Tier 1 (Preferred) area and will provide a renewable energy source in line with national policy which will not have a negative impact on the surrounding environment as outlined in the accompanying EIAR.
	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.	In compliance. The Main Wind Farm Development Site is located within a Tier 1 (Preferred) area and will provide a renewable energy source which will supply the national energy supply, while ensuring that there is no negative impact on the surrounding environment as outlined in the accompanying EIAR.

Topic	Policy	Summary	Compliance
	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.	In compliance. As outlined in **Chapter 1** of the accompanying EIAR, the Applicant appointed the Community Liaison Office (CLO) to engage with the public throughout the development of the Proposed Project.
	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.	In compliance. As part of the Proposed Project, a Battery Energy Storage System will be provided to support energy efficiency. Please refer to **Chapter 2** of the accompanying EIAR for further details.
	REP 7	To promote the harnessing of wind energy to contribute toward decarbonising County Mayo, including new emerging by-product markets.	In compliance. The Proposed Project provides for the harnessing of wind energy
Renewable Energy Objectives	**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.	In compliance. The Main Wind Farm Development Site is located in a Tier-1 area which is a preferred location within the MCDP.
	REO 2	To examine options to ensure that community benefits are derived from renewable energy development in the county.	In compliance. The Applicant will apply for support for a community benefit fund through the RESS process or other community benefit unrelated to RESS if the RESS application is unsuccessful.

Topic	Policy	Summary	Compliance
	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).	In compliance. The Main Wind Farm Development Site is located within a Tier-1 (Large wind farm) area.
	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 thereof or future guidelines, and ensure consistency with the provisions of RPO 4.16 and RPO 5.2(b) of the RSES (2020-2032).	In compliance. The Proposed Project is in accordance with National, Regional and Local Policy, including the WEG and the Mayo RES. The Proposed Project will provide a renewable energy source which will contribute to ensuring energy supply for the county.
	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.	In compliance. As part of the Proposed Project, a Battery Energy Storage System will be provided to support energy efficiency. Please refer to **Chapter 2** of the accompanying EIAR for further details.
	REO 23	To support and facilitate the achievement of the minimum renewable energy target of 600 MW 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.	In compliance. The Proposed Project will support the achievement of Mayo's renewable energy target by providing an estimated 74.1 MW to 91 MW of renewable power.
Rural Economy	**EDO 3**	To continue to promote the county to attract enterprise and investment into Mayo through the Enterprise & Investment Unit and/or Local Enterprise Office, with a focus on a number of established and emerging sectors including tourism, manufacturing, marine, renewable energy, ICT, food and agri-food.	In compliance. The Proposed Project will provide for a significant investment into Mayo by providing a renewable energy development which will support the energy

Topic	Policy	Summary	Compliance
			needs of the County and provide employment.
	EDO 54	To facilitate rural enterprises, and resource development (such as agriculture, agrifood sector, agri-tourism, commercial fishing, aquaculture, rural tourism, forestry, bio- energy, the extractive industry, recreation, cultural heritage, marine enterprise sector, research and analysis) and renewable energy resources (such as wind/ solar/ocean energy) that are dependent on their locality in rural locations, where it can be demonstrated that the development will not have significant adverse effects on the environment, including the integrity of the Natura 2000 network, residential amenity or visual amenity. Where proposals demonstrate measures to promote environmental enhancement through improved ecological connectivity, such as measures in the Pollinator Plan, additional native species planting or blue and green infrastructure measures, these will be favourably considered.	In compliance. The Proposed Project is location dependent and has undergone significant environmental assessment. The accompanying EIAR and NIS has outlined measures to promote environmental enhancement and mitigation measures to protect the environment.
Gaeltacht	**SCP 30**	To support initiatives at promoting Gaeilge, the Irish language	In compliance. The public notices, application form and NIS have been translated into Irish.
	SCP 31	To promote and protect Mayo's heritage and culture and the advancement of the Irish Language.	In compliance. The Proposed Project will provide economic development and security of supply within a Gaeltacht area. Please refer to **Chapter 4** of the accompanying EIAR.
	SCO 21	To ensure that the Irish language and our unique linguistic heritage become more visible and audible and integrated into all activities in Mayo.	In compliance. The public notices, application form, NTS and NIS have been translated into Irish.
Electricity	**INP 21**	To support the provision of high-quality, electricity infrastructure and development of an enhanced electricity supply, to serve the existing and future needs of the county and to facilitate new transmission infrastructure projects, including the delivery and integration of	In compliance. The Proposed Project will support the provision of an enhanced electricity supply to serve the existing and future

Topic	Policy	Summary	Compliance
		renewable energy proposals to the electricity transmission grid in a sustainable and timely manner, whilst seeking to minimise any adverse impacts on local communities and protect and maintain biodiversity, wildlife habitats, scenic amenities, including protected views and nature conservation.	needs of the county by providing a renewable energy source of an estimated 74.1 MW to 91 MW of renewable power.
	INP 39	To seek the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity transmission grid, in a sustainable and timely manner.	In compliance. The Proposed Project will provide a key link in the transmission network of renewable energy proposals. By providing a substation on site, the Proposed Project will support the transmission of energy in the local area. The overall Proposed Project will provide for grid connection back to Bellacorick Substation allowing for renewable energy to be transmitted to the wider area.
Landscape	**Policy 8**	Recognise the substantial pockets of residential and rural landuses in some locations and the emerging pressures for differing landuses of industry, wind energy and residential development in this policy area.	In compliance. **Chapter 10** of the accompanying EIAR concluded that; "*it is considered that the Proposed Project will result in a marked degree of change within its immediate surrounding context with regard to both landscape and visual receptors. However, a key consideration in this instance is the wind energy classification for the Main Wind Farm Development Site, which is designated as in the County Mayo RES as 'Tier 1 – Preferred (Large Wind Farms)'*

Topic	Policy	Summary	Compliance
			and are described as "areas in which the potential for large wind farms is greatest".
	Policy 9	Continue to facilitate appropriate development in a progressive and clustered manner that respects the scale, character and sensitivities of the landscape.	In compliance. The Main Wind Farm Development Site is located in a Tier-1 area, which has been identified by Mayo County Council as an area suitable for large scale wind farms.
	Policy 10	Recognise that in this low-lying open environment, tall and bulky development can have a disproportionate impact against the landscape when viewed from the predominantly low-lying areas of the public realm.	In compliance. **Chapter 10** of the accompanying EIAR concluded that; "*it is considered that the Proposed Project will result in a marked degree of change within its immediate surrounding context with regard to both landscape and visual receptors. However, a key consideration in this instance is the wind energy classification for the Main Wind Farm Development Site, which is designated as in the County Mayo RES as 'Tier 1 – Preferred (Large Wind Farms)' and are described as "areas in which the potential for large wind farms is greatest".*
	Policy 11	Encourage development that will not have a disproportionate effect on the existing character of the landscape in terms of location, design, and visual prominence.	In compliance. **Chapter 10** of the accompanying EIAR concluded that; "*it is considered that the Proposed Project will result in a marked degree of change within its immediate surrounding context*

Topic	Policy	Summary	Compliance
			with regard to both landscape and visual receptors. However, a key consideration in this instance is the wind energy classification for the Main Wind Farm Development Site, which is designated as in the County Mayo RES as 'Tier 1 – Preferred (Large Wind Farms)' and are described as "areas in which the potential for large wind farms is greatest".
Landscape Objectives	**NEP 14**	To protect, enhance and contribute to the physical, visual and scenic character of County Mayo and to preserve its unique landscape character.	In compliance. **Chapter 10** of the accompanying EIAR concluded that; "*it is considered that the Proposed Project will result in a marked degree of change within its immediate surrounding context with regard to both landscape and visual receptors. However, a key consideration in this instance is the wind energy classification for the Main Wind Farm Development Site, which is designated as in the County Mayo RES as 'Tier 1 – Preferred (Large Wind Farms)' and are described as "areas in which the potential for large wind farms is greatest".*
	NEO 25	To consider applications for development, along Mayo's Scenic routes, that can demonstrate a clear need to locate in the area concerned, whilst ensuring that it:	In compliance. **Chapter 10** of the accompanying EIAR concluded that; "*it is considered that the Proposed Project will result in a*

Topic	Policy	Summary	Compliance
		• Does not impinge in any significant way on the character, integrity and distinctiveness of the area. • Meets high standards in siting and design. • Contributes to and enhances local landscape character. • Satisfies all other criteria, with regard to, inter alia, servicing, public safety and environmental considerations. Rural housing applications along Scenic Routes must comply with the requirements set out in Objective RHO 3 (Chapter 3).	*marked degree of change within its immediate surrounding context with regard to both landscape and visual receptors. However, a key consideration in this instance is the wind energy classification for the Main Wind Farm Development Site, which is designated as in the County Mayo RES as 'Tier 1 – Preferred (Large Wind Farms)' and are described as "areas in which the potential for large wind farms is greatest".*
	NEO 26	To consider applications for development, within Mayo's Coastal Areas and Lakeshores and within areas along scenic routes with designated scenic views, that can demonstrate a long-standing social link to the area concerned, whilst ensuring that it: • Does not impinge in any significant way on the character, integrity and distinctiveness of the area. • Cannot be considered at an alternative location. • Meets high standards in siting and design. • Contributes to and enhances local landscape character. • Satisfies all other criteria, with regard to, inter alia, servicing, public safety and environmental considerations. Rural housing applications along Coastal Areas and Lakeshores must comply with the requirements set out in Objective RHO 4 (Chapter 3).	In compliance. **Chapter 10** of the accompanying EIAR concluded that; "*it is considered that the Proposed Project will result in a marked degree of change within its immediate surrounding context with regard to both landscape and visual receptors. However, a key consideration in this instance is the wind energy classification for the Main Wind Farm Development Site, which is designated as in the County Mayo RES as 'Tier 1 – Preferred (Large Wind Farms)' and are described as "areas in which the potential for large wind farms is greatest".*

Topic	Policy	Summary	Compliance
	NEO 27	To ensure all development proposals are consistent with the Landscape Appraisal of County Mayo and the associated Landscape Sensitivity Matrix and future editions thereof.	In compliance. **Chapter 10** of the accompanying EIAR concluded that; "*it is considered that the Proposed Project will result in a marked degree of change within its immediate surrounding context with regard to both landscape and visual receptors. However, a key consideration in this instance is the wind energy classification for the Main Wind Farm Development Site, which is designated as in the County Mayo RES as 'Tier 1 – Preferred (Large Wind Farms)' and are described as "areas in which the potential for large wind farms is greatest".*
	NEO 29	Require a Landscape/Visual Impact Assessment to accompany significant proposals, located within or adjacent to sensitive landscapes, where appropriate.	In compliance. The Proposed Project is accompanied by a LVIA, please refer to **Chapter 10** of the accompanying EIAR.
Cultural & Amenity Tourism	**TRP 6**	To promote and support the continued strategic development of Westport, Ballina and Castlebar as tourist destinations through: d. Promote the significant tourism potential of Ballina and its location as a prominent stop on the Wild Atlantic Way, a gateway to north-west Mayo, the Céide Fields, and internationally renowned salmon fishing, through investment in tourism related infrastructure, including Monasteries of the Moy Greenway from Belleek to Killala, incorporating EuroVelo1 Atlantic Coastal Route, Mountain Biking Trail via Ballina connecting the Wild Nephin Ballycroy National Park to the National	In compliance. As outlined in **Chapter 12** of the accompanying EIAR, where it states: "*In summary, the assessment has found that the Proposed Project would cause no significant direct or indirect effects to heritage assets within or outside the Main Wind Farm Development Site, or along the TDR or GCR".*

Topic	Policy	Summary	Compliance
		Mountain Bike Trail at Coolaney and ongoing development of the Wild Atlantic Way, including Discovery Points at Crockets Town.	
	TRP 15	To support the implementation of the opportunities and actions identified in the Mayo Tourism Strategy and Action Plan – Destination Mayo 2015-2021, SEA and AA, regarding the development of cultural and amenity tourism and the Wild Atlantic Way in Mayo, in conjunction with the Tourism section of Mayo County Council and other relevant stakeholders.	In compliance. As outlined in the accompanying EIAR, the Proposed Project will not impact negatively on cultural and amenity tourism.
	TRP 27	To support the promotion of the Wild Atlantic Way in its role to grow the economic contribution of tourism along its route, through the upgrade and improvement of the touring network, facilities and visitor attractions through: a. Exploration of the development of signature discovery points to assist and secure Mayo's position as 'The Heartbeat of the Wild Atlantic Way'. c. Working with relevant landholders and recreational/tourism agencies to increase access to the countryside and our coastal areas, and to ensure maintenance and access to the existing network of trails, paths, and tourist sites along the Wild Atlantic Way. d. Supporting the exploration of the development of new tourist services, parking and facilities or upgrading/extension of existing tourist services, parking and facilities at tourist sites along the Wild Atlantic Way. e. Build the concept of sustainability firmly into ongoing planning processes for tourism and outdoor recreation. In conducting tourism and recreation planning processes during the lifetime of the Mayo CDP, work towards adopting an ecosystem-based approach that assesses capacity of landscapes, communities, and natural resources to provide a basis for decision making that is firmly based on the principles of sustainability.	In compliance. In compliance. **Chapter 10** of the accompanying EIAR concluded that; "*it is considered that the Proposed Project will result in a marked degree of change within its immediate surrounding context with regard to both landscape and visual receptors. However, a key consideration in this instance is the wind energy classification for the Main Wind Farm Development Site, which is designated as in the County Mayo RES as 'Tier 1 – Preferred (Large Wind Farms)' and are described as "areas in which the potential for large wind farms is greatest"* As outlined in **Chapter 12** of the accompanying EIAR, which states: "*In summary, the assessment has found that the Proposed Project would cause no significant direct or indirect effects*

Topic	Policy	Summary	Compliance
			to heritage assets within or outside the Main Wind Farm Development Site, or along the TDR or GCR".
	TRO 8	To investigate the further potential of the Wild Nephin Ballycroy National Park and Dark Sky initiative in a sustainable manner. This approach should demonstrate good practice in terms of eco-tourism and wilderness and seek to gain recognised accreditation on same.	In compliance. As outlined in **Chapter 10** of the accompanying EIAR.
	TRO 11	To utilise Mayo's natural and heritage resources to foster the development of tourism as a viable sustainable sector of the economy, in a sustainable manner, which complements the scale, quality and unique features of the county.	In compliance. As outlined in **Chapter 12** of the accompanying EIAR, where it states: "*In summary, the assessment has found that the Proposed Project would cause no significant direct or indirect effects to heritage assets within or outside the Main Wind Farm Development Site, or along the TDR or GCR".*
Natural Environment	**NEO 3**	To ensure the unique ecological, scenic, recreational and environmental character of the Wild Nephin Ballycroy National Park is protected and enhanced and developed appropriately.	In compliance. As outlined in **Chapter 10** of the accompanying EIAR.
	NEO 11	To ensure that the impact of development within or adjacent to national designated sites, Natural Heritage Areas, Ramsar Sites and Nature Reserves likely to result in significant adverse effects on the designated site is assessed by requiring the submission of an Ecological Impact Assessment report (EcIA), Environmental Report (ER), an Environmental Impact Assessment Report (EIAR), if deemed necessary, and/ or a Natura Impact Assessment (NIS), if deemed necessary, prepared by a suitably qualified professional, which should accompany planning applications.	In compliance. As outlined in **Chapter 5** of the accompanying EIAR, where it states: "*Assuming that the mitigation measures in the Chapter are adopted in full, there is no likely significant residual effect on important ecological features both alone and cumulatively. ".*

Topic	Policy	Summary	Compliance
Cultural Policy Objectives	**BEP 1**	To support and promote the protection, appropriate management and sympathetic enhancement of the county's archaeological heritage within the Plan area, in particular by implementing the Planning and Development Act 2000 (as amended) and the National Monuments Act 1930 (as amended).	In compliance. As outlined in **Chapter 12** of the accompanying EIAR, where it states: "*In summary, the assessment has found that the Proposed Project would cause no significant direct or indirect effects to heritage assets within or outside the Main Wind Farm Development Site, or along the TDR or GCR".*
	BEP 2	To promote awareness of and encourage the provision of access to, the archaeological resources of the county.	N/A
	BEP 3	To encourage the management and maintenance of the county's archaeological heritage, including historic burial grounds, in accordance with best conservation practice that considers the impact of climate change.	N/A
	BEO 1	To protect the archaeological heritage and sites identified in the Record of Monuments and Places, National Monuments in the ownership or guardianship of the State in addition to National Monuments that are the subject of Preservation Orders, and to safeguard the integrity of the archaeological sites in their setting.	N/A
	BEO 4	To ensure that development in the vicinity of a Recorded Monument or Zone of Archaeological Potential is sited and designed in a sensitive manner, avoiding adverse effects on landscape setting and context of monument.	In compliance. As outlined in **Chapter 12** of the accompanying EIAR, where it states: "*In summary, the assessment has found that the Proposed Project would cause no significant direct or indirect effects to heritage assets within or outside the Main Wind Farm Development Site, or along the TDR or GCR".*

Topic	Policy	Summary	Compliance
	BEO 5	To protect all sites and features of archaeological interest discovered subsequent to the publication of the Record of Monument and Places, in situ (or at a minimum preservation by record), having regard to the advice and recommendations of the National Monuments Service of the Department of Culture, Heritage and the Gaeltacht.	In compliance. As outlined in **Chapter 12** of the accompanying EIAR, where it states: "*In summary, the assessment has found that the Proposed Project would cause no significant direct or indirect effects to heritage assets within or outside the Main Wind Farm Development Site, or along the TDR or GCR".*
	BEO 6	To protect archaeological sites, monuments, underwater archaeology and archaeological objects in their setting, which are listed on the Record of Monuments and Places for Mayo.	In compliance. As outlined in **Chapter 12** of the accompanying EIAR, where it states: "*In summary, the assessment has found that the Proposed Project would cause no significant direct or indirect effects to heritage assets within or outside the Main Wind Farm Development Site, or along the TDR or GCR".*
	BEO 10	To protect the setting of protected structures and seek to prevent the demolition or inappropriate alteration of Protected Structures, which would adversely impact on the character and special interest of the structure, where appropriate.	In compliance. As outlined in **Chapter 12** of the accompanying EIAR, where it states: "*In summary, the assessment has found that the Proposed Project would cause no significant direct or indirect effects to heritage assets within or outside the Main Wind Farm Development Site, or along the TDR or GCR".*