Planning and Environmental Consultants

Environmental Impact Assessment Report

Cahermurphy West Wind Farm Co. Clare

Chapter 2 - Background

Contents

APPENDICES

2. BACKGROUND TO THE PROPOSED PROJECT

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

2.1 Introduction

The Proposed Project comprises of 8 no. wind turbines and associated infrastructure in the townlands of Cahermurphy, Knocknahila More South, Carrownagry South, Caheraghcullin and Drummin, Co. Clare and an on-site substation and associated works, including underground cabling to connect to the National Grid via a 110kV underground cable between the proposed on-site substation and the existing 110kV GIS substation building located within the 110kV ESB Moneypoint substation.

For ease, and as set out in Chapter 1 of the EIAR:

- Where the 'Proposed Project' is referred to, this relates to all the project components described in detail in Chapter 4 of this EIAR i.e., Wind Farm and Grid Connection as detailed in Sections 1.1.1 and 1.1.2 of the EIAR.
- Where 'the Site' is referred to, this relates to the primary study area for the EIAR, as delineated by the EIAR Site Boundary in green as shown on Figure 1-1 of the EIAR.
- Where the 'Proposed Wind Farm' is referred to, this refers to turbines and associated foundations and hard-standing areas, onsite substation, borrow pit, access roads, temporary construction compounds, turbine delivery accommodation works, peatland enhancement area, underground cabling, peat, spoil and overburden management, site drainage, tree felling and all ancillary works and apparatus. The planning application for the Proposed Wind Farm Site is made to An Coimisiún Pleanála in accordance with the provisions of Section 37E of the Planning and Development Act 2000, as amended.
- Where 'Proposed Grid Connection' is referred to, this refers to the underground 110kV cabling connecting into the existing 110kV GIS Substation building located within the 110kV ESB Moneypoint Substation.

This EIAR, along with a NIS, will assess the Proposed Project, the Proposed Wind Farm Site and the Proposed Grid Connection for likely significant effects on the environment.

2.1.1 Statement of Authority

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

This chapter was led by Alan Clancy with support from Sean McCarthy and Adrian Moran. Alan Clancy is a Senior Planner at MKO, who has over 10 years of experience in private practice. Alan holds a BA in Geography & History from University of Galway and a Master's in Planning and Sustainable Development from University College Cork. Alan is a Corporate Member of the Irish Planning Institute and has experience across a range of sectors including in the commercial, residential, industrial and

renewables sectors, Alan's key strengths and areas of expertise are in development management, provision of planning advice, and project management. Since joining MKO, Alan has assisted with various projects including Strategic Infrastructure Developments, lodgement and management of Planning Applications, Development Plan Submissions and preparing Development Potential Reports. Alan is a member of the Irish Planning Institute.

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

Adrian Moran is a Planner with MKO having joined the company in April 2024. Adrian holds a BA (Hons) in History and Archaeology from University of Galway and an MSc (Hons) in Planning and Development from University of Galway. Since joining MKO, Adrian has been involved in a range of renewable energy projects including onshore and offshore wind, solar and grid infrastructure developments. His main responsibilities include preparing planning application documents and reports, preparing inputs for Environmental Impact Assessment Reports and liaising with multidisciplinary project teams.

2.1.2 Renewable Energy Resources

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

A gradual shift towards increasing our use of renewable energy is no longer sufficient. There is an urgency now to ensure significant change happens. Renewable energy development is recognised as a vital component of Ireland's strategy to tackle the challenges of combating climate change and ensuring a secure supply of energy. Ireland is heavily dependent on the importation of fossil fuels to meet its energy need. 70% of energy used in Ireland is imported from abroad, higher than the EU average of almost 60% (National Energy Security Framework 2022). This high dependency on energy imports is highly risky and Ireland is currently extremely vulnerable both in terms of meeting future energy needs and ensuring price stability. As such, expanding indigenous renewable energy supply is critical for energy security and price stability.

2.2 Climate Change Policy and Targets

International and national policy strongly emphasise the urgent need to reduce greenhouse gas emissions and combat global warming, with climate change now widely recognized as a global emergency. The IPCC's Sixth Assessment Report (2021) and its 2023 Synthesis Report warn of irreversible impacts such as rising sea levels and predict intensified extreme weather events, including floods, heatwaves, and cyclones. The World Meteorological Organization's reports confirm record-high greenhouse gas levels, unprecedented ocean heat, and severe climate-related disasters worldwide. Despite these alarming trends, the IPCC stresses that avoiding catastrophic outcomes remains possible through rapid emissions reductions to achieve net zero. In this context, the Proposed Project will play a vital role in decarbonizing

Ireland's energy sector, aligning with both national and international climate targets and contributing to a sustainable, low-carbon future.

2.2.1 International Policy and Targets

United Nations Framework Convention on Climate Change

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

Kyoto Protocol

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

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

- New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from 1st January 2013 to 31st December 2020;
- A revised list of greenhouse gases (GHG) to be reported on by Parties in the second commitment period; and
- Amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period.

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

COP- Agreements

The UNFCCC Conference of the Parties (COP) has convened annually since 1995 to advance global climate action, with COP21 in Paris (2015) marking a historic milestone through the Paris Agreement—a legally binding accord signed by 195 countries to limit global temperature rise to well below 2°C and pursue efforts to cap it at 1.5°C. Subsequent COPs have focused on operationalizing this goal and addressing emerging challenges. COP25 (Madrid, 2019) highlighted the urgency of reducing global emissions by 7.6% annually to keep 1.5°C within reach, though consensus on implementation rules was delayed. COP26 (Glasgow, 2021) reinforced commitments to net zero by mid-century, adaptation, and climate finance, while COP27 (Sharm el-Sheikh, 2022) introduced the Loss and Damage fund and reaffirmed the 1.5°C target despite setbacks on fossil fuel phase-out language. COP28 (Dubai, 2023) delivered significant progress by agreeing to transition away from fossil fuels, triple global renewable energy capacity by 2030, and adopt a global adaptation framework, alongside operationalizing the Loss and Damage fund. Collectively, these summits underscore the accelerating global effort to decarbonize

energy systems, scale renewables, and build resilience—objectives directly supported by projects like the Proposed Project.

COP29, held in Baku in November 2024, focused on accelerating global climate action, particularly climate finance. The key outcome was the New Collective Quantified Goal (NCQG), which commits developed nations to triple climate finance for developing countries—from $100 billion annually to $300 billion by 2035—though concerns remain about its adequacy and lack of strong enforcement mechanisms. Significant progress was also made on carbon markets, with nearly 200 nations agreeing on rules under Article 6 of the Paris Agreement to establish a UN-backed international carbon market, a critical step toward operationalizing global carbon trading despite governance concerns. COP30, took place in November 2025 in Belém, Brazil, it prioritized emissions reduction, climate adaptation, and finance for developing nations.

The details of these COPs are discussed in greater detail within Appendix 1 of the Planning Report which was submitted as part of both planning applications.

European Green Deal – European Climate Law (2021)

The European Green Deal, introduced in December 2019, sets out the EU's roadmap for transforming its economy into a climate-neutral system by 2050 while maintaining prosperity and improving quality of life. It establishes ambitious targets, including a 55% reduction in greenhouse gas emissions by 2030 compared to 1990 levels, aligning with the Paris Agreement goal of limiting global warming to 1.5°C. The Deal prioritizes clean energy through three principles: ensuring secure and affordable energy, creating an integrated and digitalized energy market, and developing a power sector based largely on renewables. These objectives are legally enshrined in the European Climate Law, which mandates climate neutrality by 2050, sets interim targets, and ensures all EU policies contribute to this goal. Significant financial support is provided through the Next Generation EU Recovery Plan, allocating one-third of its €1.8 trillion budget to Green Deal initiatives. Achieving these targets will require rapid deployment of renewable energy projects, such as the Proposed Project, which directly supports the EU's transition to a low-carbon future.

The details of this are discussed in greater detail within Appendix 1 of the Planning Report which was submitted as part of both planning applications.

2.2.1.2 Project Compliance with International Climate Policy

From the review of the relevant policy documents, it is considered that the Proposed Project turbines will aid in reducing reliance on fossil fuels for electricity generation. This will help to achieve the United Nations Framework Convention on Climate Change goals of limiting global temperatures as a result of climate change and the goals of the Kyoto Protocol and the several Conference of Parties agreements as outlined above. By making a just transition to more renewable forms of electricity generation, the level of carbon emissions will drop as our reliance on non-renewable forms of energy lessen.
The Proposed Project is also considered to be in line with the European Green Deal which also aims to reduce carbon emissions and achieve net zero carbon emissions by 2050. These goals will not be met if projects, such as the one proposed, are not implemented. The construction of this development would also aid in ensuring energy security within the EU, which is a target of the European Green Deal. As wind is an indigenous and abundant resource, countries can tap into their own wind potential, reducing the vulnerability to price fluctuations and geopolitical risks associated with fossil fuel imports.

2.2.2 National Climate Policy

The Joint Committee on Climate Action's 2019 report highlighted Ireland's poor performance in meeting international climate obligations and warned that the country was off track to achieve its 2030 targets. It stressed the need for a complete transformation of Ireland's energy system, including full decarbonisation of electricity generation, to reach net zero by 2050. This urgency is reflected in subsequent measures such

as the Climate Action and Low Carbon Development (Amendment) Act 2021 (the Climate Act), which legally commits Ireland to a 51% emissions reduction by 2030 and climate neutrality by 2050 through binding carbon budgets and annual Climate Action Plans. The Programme for Government 2025 reinforces these commitments, targeting 80% renewable electricity by 2030 and 9 GW of onshore wind capacity, supported by policies for repowering existing wind farms, community energy projects, and grid upgrades. These strategies, alongside carbon tax funding, energy efficiency improvements, and green job creation, underscore the critical role of renewable energy projects—such as the Proposed Project—in achieving Ireland's climate goals and ensuring compliance with national and EU obligations.

These documents are discussed in greater detail within Appendix 1 of the Planning Report which was submitted as part of both these planning applications.

The Proposed Project represents a significant opportunity for this site to be a nationally important wind energy generator, contributing to the 51% reduction in emissions being sought, which is as outlined above a legally binding requirement. The Proposed Project is therefore considered compliant with the relevant policies and objectives set out at both the European (e.g. European Green Deal) and National tiers of governance in this regard.

Carbon Budgets

To achieve the 51% emissions reduction target, the Climate Act, requires the Climate Change Advisory Council (CCAC) to recommend a proposed programme of economy-wide 5-year Carbon Budgets to the Minister for the Environment, Climate and Communications. The first national carbon budget programme proposed by the Climate Change Advisory Council, approved by Government and adopted by both Houses of the Oireachtas in April 2022 comprises three successive 5-year carbon budgets[1]. The total emissions allowed under each budget are shown in **Table 2-1** below.

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

	2021 – 2025 Carbon Budget 1	2026 – 2030 Carbon Budget 2	2031 – 2035 Provisional Carbon Budget 3
	All Gases		
Carbon Budget (Mt CO_2eq)	295	200	151
Annual Average Percentage Change in Emissions	-4.8%	-8.3%	-3.5%
The figures are consistent with emissions in 2018 of 68.3 Mt CO_2eq reducing to 33.5 Mt CO_2eq in 2030, thus allowing compliance with the 51% emissions reduction target by 2030.			

Climate Action Plans 2023-25

Ireland's Climate Action Plans (2023–2025) outline a roadmap to achieve legally binding targets of reducing greenhouse gas emissions by 51% by 2030 and reaching carbon neutrality by 2050. Central to these plans is the decarbonisation of the electricity sector through a major increase in renewable energy generation. The targets include producing 80% of electricity from renewable sources by 2030, with 9 GW from onshore wind, 8 GW from offshore wind, and up to 8 GW from solar. Interim goals aim for 50% renewable electricity by 2025, including 2 GW of onshore wind and 5 GW of solar. The plans emphasise accelerating deployment of renewables, aligning planning and permitting systems, and ensuring local and national policy integration. CAP24 highlights the urgency of scaling up onshore wind to meet carbon

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

budgets, noting that renewable generation accounted for 38.6% of electricity in 2022. CAP25 reinforces these commitments, stressing the need for rapid progress to meet sectoral emissions ceilings and carbon budgets. Overall, there is strong policy support for renewable energy projects as critical to achieving Ireland's climate objectives.

2.2.2.1 Project Compliance with National Climate Policy

The Proposed Project, consisting of 8 no. wind turbines and associated infrastructure aligns with national climate policy objectives. The Proposed Project will make a significant contribution to achieving the CAP 25 target of 9GW of onshore wind energy by the year 2030. Furthermore, the Proposed Project will aid Ireland in adhering to, or limiting the exceedance of, the country's carbon budgets. Currently, the electricity sector is rapidly approaching the designated sectoral ceiling of 20 Mt CO_2 eq for the first carbon budget period from 2020 to 2025. The national renewable energy targets and the carbon budgets are integral to the government's response to the climate crisis.

2.3 Renewable Energy Policy and Targets

This section of the EIAR provides a breakdown of international and national renewable energy policy with regards to the Proposed Project. The purpose of this section is to demonstrate alignment of the Proposed Project with established renewable energy policy frameworks at both European Union and National level Under this section, the following are discussed:

- EU Renewable Energy Policy;
- National Renewable Energy Policy;

2.3.1 EU Renewable Energy Policy

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

EU Renewable Energy Policy provides the legal framework for accelerating renewable energy deployment across all sectors to meet climate and energy targets. The Renewable Energy Directive (RED), introduced in 2009, has evolved through three major revisions: RED I set a 20% renewable share by 2020; RED II raised the 2030 target to 32%; and RED III (2023) increased it to 42.5%, with an ambition of 45%, while introducing sector-specific targets and fast-track permitting for renewable projects deemed of *"overriding public interest."*

RED III also addresses permitting bottlenecks, with new EU regulations (2025) setting strict timelines for wind projects and reinforcing priority status for renewables and related infrastructure. The REPowerEU plan, launched in response to energy security concerns following Russia's invasion of Ukraine, aims to phase out fossil fuel dependence before 2030 by diversifying energy supply and accelerating renewable deployment, including streamlined permitting.

The 2030 Climate and Energy Framework commits to at least 40% GHG reductions and 27% renewable energy by 2030, supported by Effort Sharing Regulation and the Energy Roadmap 2050, which confirms that decarbonisation is technically and economically feasible, with renewables forming the largest share of energy supply by mid-century. Overall, EU policy strongly prioritises renewable energy expansion—particularly wind and solar—as essential for achieving climate neutrality, energy security, and a sustainable energy system.

Collectively, these policy frameworks establish a strong policy level at EU level which prioritises the accelerated deployment of renewable energy infrastructure, particularly wind and solar, as essential to achieving climate neutrality and greater energy security.

European Union (Planning and Development) (Renewable Energy) Regulations 2025

On 6 August 2025, the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. No. 274 of 2025) were adopted for the purpose of giving effect to Articles 15e(5), 16, 16b, 16c(2), 16d, 16e and 16f of the RED III Directive.

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

These regulations have been introduced to ensure that renewable energy projects can be delivered at the pace that is required to meet our EU climate and energy objectives.

2.3.1.2 Project Compliance with EU Renewable Energy Policy

The Proposed Project is considered to be fully in accordance with and supported by the above-mentioned EU Policy framework and will directly contribute to the delivery of EU renewable energy targets by facilitating the production of additional renewable energy generation capacity.

The target of increasing the binding target of the EU's energy mix from 32% to a minimum of 42.5% by 2030 will necessitate the development of additional renewable energy infrastructure, such as the Proposed Project.

Similarly, the Energy Roadmap 2050 envisions renewable energy as the dominant source of energy supply in all scenarios relating to decarbonisation of our electricity supply. Therefore, the deployment of new renewable energy infrastructure, such as the Proposed Project, is essential to achieving this long-term transition away from fossil fuels.

The RePowerEU plan also aims at increasing the energy security within the EU and increasing the share of renewable energy onto the EU electricity grid. A part of this plan includes *'Speeding up renewables permitting to minimise the time for roll-out of renewable projects and grid infrastructure improvements'*. This will make the sector more efficient and reach the set goals faster.

Furthermore, Regulation 2022/2577 introduced significant measures to facilitate the acceleration of the deployment of renewable energy, including an obligation on member states to prioritise the roll of renewable energy projects when balancing competing legal interests. This further reinforces the importance of the delivery of renewable energy infrastructure such as the Proposed Project.

Furthermore, the planning application for the Proposed Wind Farm has been prepared in line with the EU Renewable Energy Directive (RED III) and, specifically, the Schedule of Information to Inform the Completeness Check, provided by An Coimisiún Pleanála (ACP), as Appendix 2 of their SID determination under ABP-319676-24. A full assessment of the Proposed Wind Farm in relation to this schedule has been included as a standalone document as part of the Proposed Wind Farm application.

Overall, it is considered that the Proposed Project is directly aligned with and supports EU Renewable Energy climate objectives and is therefore fully aligned with the European renewable energy framework.

2.3.2 National Renewable Energy Policy

Ireland's energy policy framework has evolved through the Green Paper (2014, updated 2020/2021), the White Paper "Ireland's Transition to a Low Carbon Energy Future 2015–2030," and subsequent strategies to ensure a secure, sustainable, and competitive energy system. The White Paper sets out a vision for an 80–95% reduction in energy-related GHG emissions by 2050, driven by renewable electricity generation,

electrification of heat and transport, and bioenergy. Onshore wind is identified as Ireland's most cost-effective renewable resource, requiring accelerated deployment to meet targets such as 40% renewable electricity by 2020 and 51% emissions reduction by 2030. The National Energy Security Framework (2022), developed in response to the Russian invasion of Ukraine and EU REPowerEU measures, emphasizes reducing reliance on imported fossil fuels through rapid renewable energy expansion, streamlined permitting, and alignment of planning systems. The Energy Security Package (2023) builds on this by prioritizing reduced demand, a renewables-led system, resilience, and robust risk governance to secure Ireland's energy future. Overall, these policies underscore the critical role of renewable energy projects—particularly wind—in achieving Ireland's climate neutrality by 2050 and safeguarding energy security.

The McCarthy Report, part of Ireland's energy security package, highlights planning and environmental consent delays as a major obstacle to delivering critical infrastructure, including renewable energy projects—a challenge previously noted by the International Energy Agency. Technical analysis within the package identifies two pillars essential for energy security: rapidly harnessing indigenous renewable resources and accelerating electrification of energy demand. To address these issues, the package introduces measures such as *"Action 10: Implement Planning and Consenting System Reforms,"* aimed at aligning and resourcing the planning system to support fast-tracked renewable development in line with EU directives and REPowerEU.

The Proposed Project will directly support these objectives by providing clean, domestic electricity to the national grid, contributing to a renewables-led system and strengthening Ireland's energy security.

The specifics of these policies are set out in detail within Appendix 1 of the Planning Report which is included as part of both planning applications.

2.3.2.1 Project Compliance with the National Renewable Energy Policy

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

Through the harnessing of indigenous wind resources, the Proposed Project will directly contribute to reducing Irelan's reliance on imported fossil fuels and in doing so will enhance long term energy security.

2.4 Climate and Renewable Energy Target Progress

At a European level, the latest data shows that, as of 2022, 23% of energy came from renewable energy sources[2]. This represents an increase of 1.1% compared to 2021 levels. While progress is being made to increase the share of renewable energy, it is clear that all EU member states need to intensify their efforts to collectively comply with the target of 42.5% set in the latest revision of the renewable energy directive.

Of the 27 EU member states, Ireland has the lowest proportion of renewable energy at 13.1%. It is evident that Ireland is not performing well when compared against our European counterparts and that urgent action is required to increase the overall share of renewable energy in our gross final energy consumption. When it comes to the share of renewable energy in electricity, Ireland does perform better generating 36.8% in 2022, but still below the EU average of 41.1%[3].

[2] https://ec.europa.eu/eurostat/en/web/products-eurostat-news/w/ddn-20231222-2
[3] https://ec.europa.eu/eurostat/databrowser/view/nrg_ind_ren__custom_9264705/default/bar?lang=en

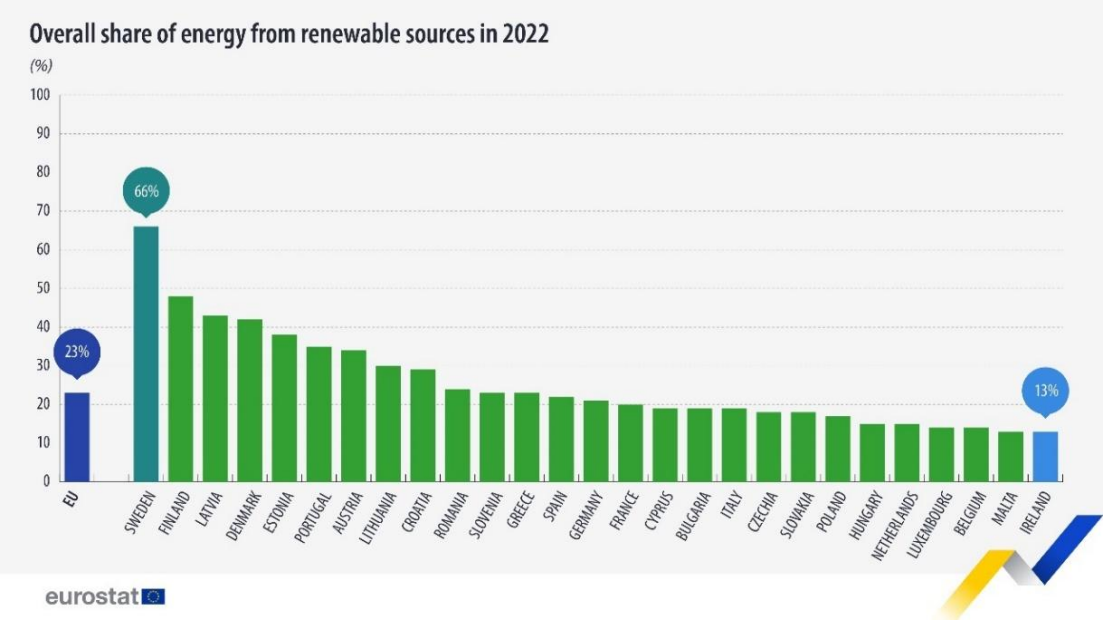


Figure 2-1 Overall share of energy from renewable sources (source: Eurostat)

When it comes to the share of renewable energy in electricity, Ireland does perform better. In 2022, 36.8% of Ireland's electricity was renewable. This puts Ireland below the EU average of 41.1%.

Ireland's Greenhouse Gas Emissions Projections

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

The EPA produced two scenarios in preparing greenhouse gas emissions projections to 2055, a *"With Existing Measures"* (WEM) scenario and a *"With Additional Measures"* (WAM) scenario. These scenarios forecast Irelands greenhouse gas emissions in different ways. The WEM scenario assumes that no additional policies and measures, beyond those already in place by the end of 2023. This is the cut off point for which the latest national greenhouse gas emission inventory data is available, known as the 'base year' for projections. The WAM scenario has a higher level of ambition and includes government policies and measures to reduce emissions such as those in Ireland's CAP 25.

The EPA Emission Projections Update notes the following key trends:

Ireland is not on track to meet the 51 per cent emissions reduction target (by 2030 compared to 2018) based on these projections which include most 2025 Climate Action Plan measures.

- Emissions from the Energy Industries sector are projected to decrease by between 59 and 68 per cent over the period 2022 to 2030. Renewable energy generation at the end of the decade is projected to range from 69 to 80 per cent of electricity generation as a result of a projected rapid expansion in wind energy and other renewables.
- Sectoral emissions ceilings for 2030 are projected to be exceeded by the Buildings, Electricity, Industry and Transport sectors; and met by the sector 'Other'.
- Budget period 1 (2021-2025) of 295 Mt CO2eq is projected to be exceeded by between 8 to 12 Mt CO2eq. Budget period 2 (2026-2030) of 200 Mt CO2eq is also expected to be exceeded by a significant margin of 77 to 114 Mt CO2eq (with carryover from Budget period 1).

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

National Energy Projections (November 2024)

The National Energy Projections Report 2024 sets out the latest renewable energy and climate projections by the SEAI. Based on the EPA projections outlined above which were published in May 2024, the report presents the findings of the 2024 national energy and climate modelling cycle.

The most notable conclusion drawn from this year's projections is the significant gap between projections across all scenarios and legally binding national and EU targets. Even with full implementation of CAP 25, Ireland is projected to miss its national and EU climate and energy targets for 2030.

In this year's projections, in addition to the 'WEM' and 'WAM' scenarios (defined in the previous Section), the SEAI has included a 'risk' scenario, which examines the risk of delays in achieving some of the most significant and ambitious targets set in CAP24, such as the renewable electricity targets. The risk scenario for variable renewable generation capacity was developed using forecasts from surveys of expert stakeholders. The survey results indicated that there is a risk of under-delivery of 2.8 GW onshore wind by 2030.

Energy in Ireland (December 2024)

In December 2024, the Sustainable Energy Authority of Ireland (SEAI) released an annual publication '*Energy in Ireland'* report which looks at trends in national energy use and at the underlying driving forces, such as the economy and weather, and more recently the impacts of high energy prices. It also examines GHG emissions from energy use, energy security, cost competitiveness, and Ireland's progress towards EU renewable energy targets.

The Report identifies that Ireland's national energy-related emissions in 2023 were at their lowest level in over 30 years. Energy-related emissions in 2023 were 31.4 $MtCO_2eq$, down 8.3% on 2022 levels, and lower even than those observed during the height of COVID impacts in 2020. Energy-related emissions fell by over 2.8 $MtCO_2eq$ in 2023 - the largest annual reduction observed in 12 years. The following are some of the key points, relating to renewable energy and energy emissions:

- Ireland's national energy-related emissions have fallen for seven of the last ten years.
- 14.1% of Ireland's primary energy was renewable in 2023, with fossil fuel remaining the dominant source of Ireland's energy.
- Wind generation provided 33.7% of electricity supply in 2023.
- 2023 electricity emissions were 7.6 MtCO2eq, the lowest on record, down 22% on 2022 levels.
- 2023 was the first year in which fossil fuel generation accounted for less than half of Ireland's gross electricity supply.
  In 2023, Ireland had 4.74 GW of installed wind capacity, up 4.5% on the previous year.

The Report states that over the last 10-years, Ireland has added wind capacity at an average rate of 0.26 GW per annum, although this has dropped to a rate of 0.14 GW over the last 5-years. To align to the pace of the WAM scenario projections needed to deliver on the 80% RES-E target, the roll-out of onshore wind capacity needs to return to the rate previously achieved between 2016 and 2019. The Report then goes on to state the following:

> *"**Increasing wind generation through added wind infrastructure is key to decarbonising Ireland's electricity supply.** The decarbonisation of electricity maximised the positive impact of sustainability technologies like heat pumps and electric vehicles. The recent slow-down in added wind capacity is impacting Ireland's transition to a sustainable energy future. **Renewable capacity***

must be added faster than electricity demand increases. We must do everything we can to support the roll-out of both onshore and offshore wind *and grid-connected solar PV capacity".* (emphasis added)

Ireland's Climate Change Assessment (January 2024)

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

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

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

The Climate Change Advisory Council Electricity Sectoral Review 2025

The Climate Advisory Council published its annual review in April 2025, outlining detailed observations and recommendations for the Electricity sector in Ireland. This review emphasises the urgent need for Ireland to accelerate its transition to renewable energy to meet its 2030 electricity capacity targets and adhere to sectoral emissions ceilings. The Climate Change Advisory Council states:

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

Key observations in relation to Renewable Electricity are outlined below:

- *While 1.6 GW of onshore wind (0.7 GW) and solar (ca 0.9 GW) renewable projects received planning permission during 2024, only an additional 0.5 GW (0.2 GW onshore wind and 0.3 GW solar) of new utility-scale renewable capacity was connected, which is significantly below the 1.8 GW annual average increase in capacity that is required to meet 2030 targets.*
- *Dispatch-down is the practice of deliberately reducing renewable generation due to grid limitations. In 2024, the dispatch-down energy from wind resources was 1,266 GWh (10.1% of the total available wind energy) and 39 GWh from solar resources (5.3% of the total available solar energy).*

- *In addition to the 0.3 GW of grid-scale solar capacity connected in 2024, there has been a significant increase in small-scale renewable generation, comprising mainly domestic rooftop solar photovoltaic panels, with a total of 0.5 GW connected by the end of 2024 (ESB Networks, personal communication, February 2025)*

2.5 Planning Policy Context

2.5.1 Introduction

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

- National Policy Context
- Regional Policy Context
- Local Policy Context
- Other Relevant Material Considerations

As a renewable energy project, the Proposed Project is consistent with the overall national policy objectives to increase penetration and deployment of renewable energy resources and has been designed in the context of the relevant wind energy and other guidelines. The specific compliance with the National, Regional and Local/County Development Plan provisions is dealt with in detail in the sections below.

2.5.2 National Policy Context

The Planning and Development Act 2024

The Planning and Development Act 2024 (the new Act) was signed into law by the President on the 17th of October 2024, after passing in both Houses of the Oireachtas. At the time of lodgement of this planning application, the current Planning and Development Act 2000 (as amended) (PDA) remains in place until the relevant provisions of the new Act is commenced by Ministerial Orders, with the Government indicating that this will be done on a phased basis.

National Planning Framework First Revision (2025)

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

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

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

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

Regional Renewable Energy Capacity Allocations have been introduced under the Revised NPF. This was one of the key actions for CAP24 and is supported under CAP25. The Southern Region, in which the Proposed Project is located, is allocated a target of installing an **additional 978MW of onshore wind energy by 2030.**

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

The introduction of renewable energy targets represents a more active and prescriptive approach to land use planning for renewable energy development. The Revised NPF aligns the national target of 9GW of onshore wind energy with the policies and objectives of Local Authorities.

In regard to this, it is clear that the provision of new renewable energy generation through the Proposed Project, which will generate an estimated electricity generation capacity of between 50.4 and 57.6MW, is in line with aims and objectives of the Revised NPF, which seeks to transition to a carbon neutral economy.

National Development Plan 2021- 2030

The National Development Plan 2021 – 2030 (NDP) was published on the 4th of October 2021 and sets out the major public investment projects identified by the Government which are to play a significant role in addressing the opportunities and challenges faced by Ireland over the coming years such as housing, health, population growth, and most relevant to the Proposed Project, climate change.

Reflecting on the recent publication of the IPCC's 6th Assessment Report, the NDP notes that the Irish Government is fully committed to 'playing its part' to ensure that the worst climate change damage can be avoided, e.g. significant reductions in CO_2 and other GHG emissions as assisted by the achievement of both European and national renewable energy targets. Specifically, the NDP states that,

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

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

One of the NDP's strategic climate priorities is the need for low-carbon, resilient electricity systems; specifically, the plan commits to increasing the share of renewable electricity up to 80% by 2030. This is characterised by the NDP as an *'unprecedented commitment to the decarbonisation of electricity supplies'* which, is certainly ambitious and an explicit driver for the deployment of new renewable generators e.g. the Proposed Project, and the safeguarding / maintenance of existing assets. It is noted that the reliability of electricity supplies will also be strengthened through investment in the electricity transmission and distribution grid. The focus of investment in regulated network infrastructure is to contribute to a long-term, sustainable and competitive energy future for Ireland.

2.5.2.2 Project Compliance with National Policy

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

The Revised NPF projects a population increase of approximately one million people by 2040 and therefore recognises the strain and demand this will put on Irelands energy system. In order to ensure Ireland delivers on our renewable energy and carbon emission reduction targets, the NPF recognises the need for increased renewable energy onto the national grid.

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

This shift from fossil fuels is dependent upon schemes such as the one proposed to generate renewable energy. Given the projected population increase, it is considered that if the share of renewable energy onto the grid is not increased, Ireland will fail to reach the National and International targets on emission reductions. The addition of 8 no. wind turbines, with an estimated electricity generation capacity of between 50.4 and 57.6MW, will contribute to Ireland's national targets and support the country in meeting its renewable energy and carbon emission reduction goals at the EU level.

2.5.3 Regional Policy

Southern Regional Assembly Regional Spatial & Economic Strategy

The Regional Spatial and Economic Strategy (RSES), adopted in January 2020, supports the implementation of Project Ireland 2040 and aims to create a prosperous, sustainable, and climate-resilient region. Recognizing climate change as Ireland's most significant long-term challenge, the RSES emphasizes transitioning to a low-carbon energy future through investment in renewable energy and grid infrastructure. Strategic Aim 8 prioritizes climate action and resilience, while key Regional Policy Objectives (RPOs) promote renewable energy integration, efficiency, and security. These include objectives to deliver infrastructure for compact growth (RPO 9), advance low-carbon energy across all sectors (RPO 87), support sustainable renewable generation (RPO 95), upgrade grid systems for renewables (RPO 96), develop wind energy at appropriate locations (RPO 99), and integrate indigenous renewable production into the grid (RPO 100). Collectively, the RSES strongly supports projects like the Proposed Project as essential to achieving national and EU climate targets.

The specifics of these policies are set out greater detail within Appendix 1 of the Planning Report which was submitted as part of this planning application.

2.5.3.2 Project Compliance with Regional Policy

The RSES supports the Southern Region as a Carbon Neutral Energy Region. At present, the RSES notes that the Region has more renewable energy generation than demand which indicates a strategic role for the region's energy assets in national energy generation and transmission with projected increases in population and economic growth, the demand for energy is set to increase in the coming years. It is considered that the Proposed Project would facilitate this just transition and is particularly in line with the RPO objectives as outlined above. In the region, a noticeable trend has emerged to recognise and take advantage of emerging opportunities related to the shift towards a decarbonised economy, particularly in the realm of renewable energy generation and therefore the Proposed Project is in line with Regional Policy.

2.5.4 Local Policy

The site falls within the administrative area of Clare County Council and therefore, is subject to the planning policies and objectives set out within the Clare County Development Plan 2023-2029.

2.5.4.1 Proposed Wind Farm

The Clare County Development Plan (CCDP) 2023–2029, adopted in April 2023, prioritises climate action, aiming to achieve decarbonization and position Clare as a national leader in renewable energy.

The CCDP's Climate Action Chapter and the Clare Renewable Energy Strategy (RES) set out objectives to maximize renewable energy potential, support national targets, and guide development to suitable locations while safeguarding the environment and residential amenities. The RES emphasizes Clare's strong natural resources—wind, coastal location, and grid infrastructure—and includes a target of 550 MW for wind energy, noting this is not a cap. Policy RES 2.1 commits to meeting the county's energy needs from 100% indigenous renewable sources. Objective RES 3.1 seeks to exceed renewable energy targets by 2030. The Clare Wind Energy Strategy (WES) 2023–2029, incorporated into the CCDP, provides a planning framework for wind development, identifying 'Strategic Areas' and 'Acceptable in Principle' zones based on wind resource, grid access, and environmental considerations. 7 of the 8 proposed turbines are located within a strategic area for wind farm development whilst the remaining turbine is located within an area designated as acceptable in principle for wind farm development, aligning with the CCDP's vision to drive a low-carbon economy, energy security, and green business development.

Compliance of the Proposed Project with relevant policies of the CCDP is set out in **Table 2-2** below.

Table 2-2 Renewable Energy Policy – Clare County Development Plan 2023-2029

Topic	Policy / Objectives	Compliance
Climate Action	**CDP 2.1: Climate Action** It is an objective of Clare County Council: a) To support the implementation of the National Climate Action Plan 2023 and the National Climate Change Adaptation Framework (and any subsequent versions thereof), and to work with the Regional Climate Action Offices to enable County Clare to transition to a low carbon and climate resilient county; b) To adopt sustainable planning strategies through integrating land use and transportation and by facilitating mixed use developments as a means of supporting national targets of climate policy mitigation and adaptation objectives, and reducing our carbon footprint and greenhouse gas emissions; and c) To raise awareness and understanding of the impacts of climate change on both the local economy and communities in the county, and the ways communities can increase their response and grow their resilience to these impacts.	The Proposed Wind Farm is in compliance with CDP 2.1 as it will deliver up to 57.6MW of onshore renewable energy, directly contributes to the wind energy target of 9GW of onshore wind introduced by CAP 23. The Proposed Project will generate clean, renewable electricity, which will be integrated into the grid, helping to electrify and decarbonise other sectors. This will also aid in achieving the climate change and renewable energy objectives to reach national targets and transition to a low carbon economy.
	CDP 2.2: Climate Change Mitigation, Adaption and Resilience It is an objective of the Clare County Council: a) To support the implementation of the Clare Climate Change Adaptation Strategy 2019-2024 (and any subsequent versions); b) To promote measures that build resilience to climate change to address impact reduction, adaptive capacity, awareness raising, providing for nature-based solutions and emergency planning; c) To raise awareness of issues relating to climate change and climate change adaptation during the lifetime of this plan; d) To liaise, collaborate and work in partnership with the relevant government approved sectors in relation to initiatives and activities across the county;	The Proposed Wind Farm supports the implementation of the updated Clare Climate Action Plan 2024 – 2029. The proposed Wind Farm will aid decarbonisation measures in the County and is therefore in line with the aims of the Climate Action Plan. The Proposed Wind Farm will contribute to the progression of renewable energy generation and technologies in Co. Clare.

Topic	Policy / Objectives	Compliance
	e) To support the Ennis 2040 Spatial and Economic Strategy and its aspiration for Ennis to become Ireland's first climate adaptive town; and f) To facilitate and support the relevant stakeholders and enterprises in the progression of advancements in climate adaptation solutions and renewable energy generation and technologies	
	CDP2.14 Transition to a Low Carbon Economy and Society It is an objective of Clare County Council: a) To facilitate measures which will accelerate the transition to a low carbon economy and a circular economy through mechanisms such as the Climate Action Competitive Fund; b) To support the development of enterprises that create and employ green technologies and to promote County Clare as a low carbon county as a means of attracting inward investment to the county and to the wider Southern Region; c) To support the Ennis 2040 Strategic Objective to establish Ennis as Ireland's first climate adaptive town; d) To support and facilitate the implementation of the Clare Climate Change Adaptation Strategy 2019-2024; e) To ensure that the development of green industry and technologies incorporates careful consideration of potential environmental impacts at project level including the capacity of the receiving environment and existing infrastructure to serve these new industries. f) To facilitate the development of energy sources which will achieve low carbon output. g) To support sustainable modes of transport such as walking and cycling through promotional strategies and the provision of active travel infrastructure where required; h) To work to implement the provisions of Ireland's Transition to a Low Carbon Energy Future 2015-2030 as they relate to County Clare; i) To require the submission of an Energy Efficiency and Climate Change Adaptation Design Statements for large scale commercial and residential applications; j) To promote climate change issues across business, public and residential sectors and to target measures and support initiatives to achieve reduced greenhouse gas emissions in accordance with current and future national targets, improve energy efficiency and	By supplying sustainable renewable energy, the Proposed Wind Farm will reduce the need for non-renewable sources like coal and oil, helping to transition toward a low carbon economy and cleaner energy usage in the county. By providing between up to 57.6MW of energy, the Proposed Wind Farm of 8 no. wind turbines at Cahermurphy, Co. Clare will contribute to enhancing energy security by decreasing the dependency on fossil fuel electricity generation. Furthermore, the generation of renewable energy through resources like the Proposed Project will help to moderate energy costs for consumers over time, both locally and nationally. This aligns with the objectives of Ireland's Transition of a Low Carbon Energy Future 2015-2030 through renewable energy generation in the County and supports the implementation of the CCDP's objectives of promoting sustainable and secure energy in Co. Clare.

Topic	Policy / Objectives	Compliance
	increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture; k) To support investments in the energy efficiency of existing commercial and public building stock with a target of all public buildings and at least one-third of total commercial premises upgraded to BER Rating 'B'; and l) To report annually on energy usage in all public buildings and to achieve a target of 33% improvement in energy efficiency in all buildings in accordance with the National Energy Efficiency Action Plan (NEEAP).	
Renewable Energy	**CDP 11.47: Renewable Energy** It is an objective of Clare County Council the Development Plan: a) To encourage and to favourably consider proposals for renewable energy developments, including community owned developments, and ancillary facilities in order to meet National, Regional and County renewable energy targets, and to facilitate a reduction in CO2 emissions and the promotion of a low carbon economy; b) To assess future renewable energy-related development proposals having regard to the Clare Renewable Energy Strategy 2023-2030 in Volume 5 of this plan and associated SEA and AA; c) To support the sustainable development of renewable wind energy (onshore and offshore) at appropriate locations and of its related grid infrastructure in County Clare, in accordance with all relevant policies, guidance and guidelines pertaining to the protection of the environment and protected habitats and species, and to assess proposals having regard to the Clare Wind Energy Strategy in Volume 6 of this plan and the associated SEA and AA, or any subsequent updated adopted Strategy and to national Wind Energy Guidelines; d) To prepare a new and updated Wind Energy Strategy for County Clare during the lifetime of this plan, subject to the publication of the update to the Wind Energy Development Guidelines for Planning Authorities 2006; e) To strike an appropriate balance between facilitating renewable and wind energy-related development and protecting the residential amenities of neighbouring properties;	As a renewable energy project that directly contributes to the achievement of a crucial national climate target, the Proposed Wind Farm contributes directly to this objective and therefore should be favourably considered by Clare County Council. The Proposed Wind Farm is suitably sited in an area classified as a 'Strategic Area' in the Clare Wind Energy Strategy. The Proposed Wind Farm has been designed in compliance with the Wind Energy Guidelines (2006). The wind farm design has had regard for the Draft Wind Energy Guidelines (2019). The Proposed Wind Farm, through strategic site selection exercise, including a detailed constraints analysis has been designed to limit the impact on the residential properties in the vicinity of the proposed turbines. This will ensure that an appropriate balance is met between facilitating renewable energy development and protecting residential amenity. The Proposed Wind Farm complies with the requirements set out by the 2006 Guidelines, including noise, set

Topic	Policy / Objectives	Compliance
	f) To support and facilitate the development of new options and technological advances in relation to renewable energy production and storage, that may emerge over the lifetime of this Plan; g) To support the integration of indigenous renewable energy production and grid injection; h) To ensure that all proposals for renewable energy developments and ancillary facilities in the County are in full compliance with the requirements of the SEA and Habitats Directive and Objective CDP 3.3 of this plan; and To promote and market the County as a leader of renewable energy provision.	back, shadow flicker. The Proposed Wind Farm also adheres to the 2019 guidelines in relation to shadow flicker (zero). The layout of the proposed wind turbines achieves a 4 times tip height set back distance from all dwellings.
	CDP 6.17: Energy Supply It is an objective of Clare County Council to contribute to the economic development and enhanced employment opportunities in the county by: a) Enabling the development of a self-sustaining, secure, reliable and efficient renewable energy supply and storage for the County in line with CDP Objective 3.3; b) Facilitating the county to become a leader in the production of sustainable and renewable energy for national and international consumption through research, technology development and innovation; and c) Supporting on-land and off-shore renewable energy production by a range of appropriate technologies in line with CDP Objective 3.3.	The Proposed Wind Farm directly supports the objectives of CDP6.17 through the generation of renewable energy and reducing the County's reliance on fossil fuel electricity generation. In doing so, it will enable the development of a self-sustaining, secure, reliable and efficient renewable energy supply and storage for the County, further advancing the Council's goal of contributing to economic development and enhanced employment opportunities in the county.
	CDP 8.12: Renewable Energy Development It is an objective of Clare County Council the Development Plan: To support the implementation of the National Renewable Energy Action Plan (NREAP), the Clare Wind Energy Strategy and the Clare Renewable Energy Strategy to facilitate the development of renewable energy developments in rural areas to meet national objectives towards achieving a low carbon economy	Through the provision of up to 57.6MW of renewable electricity, the Proposed Wind Farm contributes to the achievement of the policies and objectives of the NREAP, the Clare Wind Energy Strategy and the Clare Renewable Energy Strategy.

Topic	Policy / Objectives	Compliance
	by 2050 subject to the requirement of the RES SEA Environmental Report and the mitigation measures arising from the CDP Appropriate Assessment as contained in Volume 10(a).	
	CDP 11.44: Energy Security It is an objective of Clare County Council the Development Plan: To promote and facilitate the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure, to integrate renewable energy sources, thereby creating a secure and efficient energy supply and storage system for County Clare which is ready to meet increased demand as the regional economy grows.	Projects such as the Proposed Project are a critical component in decoupling the county from reliance on fossil fuels. By generating renewable energy, wind farms contribute to achieving the long-term goal of replacing fossil fuels with sustainable energy sources. The Proposed Project therefore aligns with the CDP 11.44 'Energy Security,' emphasising a transition away from traditional non-renewable fuels to a renewables led electricity system.
	CDP 11.45: Electricity Networks It is an objective of Clare County Council: **a)** To facilitate improvements in energy infrastructure and encourage the expansion of the infrastructure within the county; **b)** To facilitate future alternative renewable energy developments and associated utility infrastructure throughout the county; **c)** To support the Integrated Single Electricity Market (ISEM) as a key priority for the Southern Region and the sustainable development and reinforcement of the energy grid including grid connections, transboundary networks to and through County Clare subject to appropriate environmental assessment and planning processes; **d)** To collaborate with EirGrid to facilitate the development of a safe, secure and reliable supply of electricity, enhanced electricity networks and new transmission infrastructure	By generating between up to 57.6MW of renewable energy, the Proposed Project of 8 no. wind turbines at Cahermurphy, Co. Clare supports the improvement and expansion of renewable electricity infrastructure in the county.

Topic	Policy / Objectives	Compliance
	projects that might be brought forward in the lifetime of this Plan under EirGrid's (2017) Grid Development Strategy (subject to appropriate environmental assessment and the planning process); **e)** To collaborate with EirGrid over the lifetime of the plan to ensure that the county's minimum target of 1,167MW of renewable energy generation is achieved and can be accommodated on the electricity network in County Clare; and **f)** To have regard to environmental and visual considerations in the assessment of developments of this nature and ensure compliance with the environmental requirements of objective CDP 3.3 of this plan.	
	CDP 11.48: Renewable Energy Strategy It is an objective of Clare County Council: a) To support implementation of the National Renewable Energy Action Plan (NREAP), and the Offshore Renewable Energy Plan including mitigation measures outlined in their respective SEA and AA and promote County Clare and the Southern Region as a leader and innovator in sustainable renewable energy generation; b) To support the implementation of the Clare Renewable Energy Strategy 2023-2029 in Volume 5 of this plan; and c) To support the development of a Regional Renewable Energy Strategy with relevant stakeholder	The Proposed Project is supported by the policies and objectives of the NREAP. The Proposed Wind Farm is compliant with the policies and objectives of the Renewable Energy Strategy (RES).
Biodiversity, Natural Heritage	**CDP15.1 Biodiversity** It is an objective of Clare County Council: a) To implement the National Biodiversity Action Plan 2017- 2021, the All Ireland Pollinator Plan 2021-2025, the EU A Farm to Fork Strategy 2020, the County Clare Heritage Plan 2017-2023 and the County Clare Biodiversity Plan 2017- 2023, or any subsequent plans, in partnership with all relevant stakeholders;	The Proposed Project takes into consideration the importance of the local biodiversity to make sure it is retained during the construction, operation and decommissioning phases of the Proposed Project.

Topic	Policy / Objectives	Compliance
and Green Infrastructure	b) To review the Clare County Heritage Plan 2017-2023 and to prepare a new plan, which will be set within the context of the National Heritage Plan "Heritage Ireland 2030", upon the expiry of the existing adopted Plan; c) To support National Biodiversity Week and events such as Bioblitz in order to increase awareness of biodiversity and its benefits to the community;	
	CDP 15.3: European Sites It is an objective of Clare County Council: a) To afford the highest level of protection to all designated European sites in accordance with the relevant Directives and legislation on such matters; b) To require all planning applications for development that may have (or cannot rule out) likely significant effects on European Sites in view of the site's Conservation Objectives, either in isolation or in combination with other plans or projects, to submit a Natura Impact Statement in accordance with the requirements of the EU Habitats Directive and the Planning and Development Act, 2000 (as amended); and c) To recognise and afford appropriate protection to any new/modified SPAs or SACs that are identified during the lifetime of this Development Plan through the planning application process bearing in mind proposals for development outside of a European site may also have an indirect effect	The Proposed Project application considers the impact on protected sites, habitats and species. The EIAR concludes that there will be no significant negative impacts on the protected species and habitats of designated sites. The NIS concludes that the Proposed Project, individually or in-combination with other plans or projects, will not adversely affect the integrity of any European Site.
	CDP 15.4: Requirement for Appropriate Assessment It is an objective of Clare County Council: a) To implement Article 6(3) and where necessary 6(4) of the Habitats Directive and to ensure that Appropriate Assessment is carried out in relation to works, plans and projects likely to impact on European Sites (SACs and SPAs), whether directly or indirectly or in combination with any other plan(s) or project(s); and b) To have regard to Appropriate Assessment of Plans and Projects in Ireland – Guidelines for Planning Authorities 2009 or any updated version.	To support ACP in carrying out their Appropriate Assessment, an Appropriate Assessment Screening Report and Natura Impact Statement (NIS) have been prepared for the Proposed Project. This report has been prepared to provide the competent authorities with the information necessary to complete an Appropriate Assessment screening and an Appropriate Assessment for the Proposed Project in compliance with Article 6(3) of the Habitats Directive.

Topic	Policy / Objectives	Compliance
		The NIS concludes that the Proposed Project, individually or in-combination with other plans or projects, will not adversely affect the integrity of any European Site. It is therefore judged that, provided that the Proposed Project is constructed and operated in accordance with the design, best practice and mitigation that is described within this application, significant residual impacts on biodiversity, flora and fauna will not occur. The biodiversity enhancement measures outlined for the Proposed Project will result in an improvement of the existing ecological conditions of the Site.
	CDP15.5: Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs) It is an objective of Clare County Council: a) To actively promote the conservation and protection of areas designated as NHA's (including proposed sites) and to only consider proposals for development within or affecting an NHA where it can be clearly demonstrated that the proposed development will not have a significant adverse effect on the NHA or pNHA; and b) To identify and afford appropriate protection to any new, proposed or modified NHA's identified during the lifetime of the Development Plan;	Chapter 6 of the EIAR provides a full assessment of any potential impacts from the construction operational and decommissioning phases on all NHAs and pNHAs within 20km of the proposed turbine locations. No negative effects have been identified, thus the Proposed Project is in full compliance with CDP 15.5.
	CDP 15.8: Non-Designated Sites and Biodiversity It is an objective of Clare County Council: a) To ensure the protection and conservation of areas, sites, species and ecological networks/corridors of biodiversity value outside of designated sites throughout the	As detailed in Chapter 6 of the EIAR, the Proposed Project has been specifically designed to avoid or mitigate impacts on biodiversity.

Topic	Policy / Objectives	Compliance
	County and to require an ecological assessment to accompany development proposals likely to impact on such areas or species; b) To ensure that available habitat mapping is taken into consideration in any ecological assessment undertaken; c) To complete the Habitat Mapping of the County (in accordance with A Guide to Habitats in Ireland – The Heritage Council 2000) in order to identify and record the natural habitats of the County at a detailed level and afford appropriate protection to areas of importance as required; and d) To implement and monitor the actions as set out in the Clare Biodiversity Action Plan and the National Biodiversity Action Plan	As detailed in the Bat Report in Appendix 6-2 of the EIAR, there is unlikely to be any significant effect in relation to collision risk to bats from the Proposed Wind Farm. As detailed in Chapter 7 of the EIAR, the Collision Risk Assessment (CRA) indicates that the impact of the Proposed Wind Farm on birds corresponds to a Low-Very Low effect significance.
	CDP15.12: Biodiversity and Habitat Protection It is an objective of Clare County Council: a) To protect and promote the sustainable management of the natural heritage, flora and fauna of the County both within protected areas and in the general landscape through the promotion of biodiversity, the conservation of natural habitats, the enhancement of new and existing habitats, and through the integration of Green Infrastructure (GI), Blue Infrastructure and ecosystem services including landscape, heritage, biodiversity and management of invasive and alien species into the Development Plan; b) To promote the conservation of biodiversity through the protection of sites of biodiversity importance and wildlife corridors, both within and between the designated sites and the wider Plan area; c) To support the implementation of the All Ireland Pollinator Plan, National Biodiversity Action Plan and National Raised Bog SAC Management Plan; d) To ensure there is no net loss of potential Lesser Horseshoe Bat feeding habitats, treelines and hedgerows within 2.5km of known roosts; e) To implement and monitor the actions as set out in the Clare County Biodiversity Plan; and To promote biodiversity net gain in any new plans/projects/policies to promote development that leaves biodiversity in a better state than before	Chapter 6: Biodiversity (Flora and Fauna) of the EIAR presents an assessment of all habitats present within the Proposed Wind Farm site boundary, and those of EU importance located within the Zone of Influence (i.e. the within the EIAR Site Boundary, those in proximity to the EIAR Site Boundary, and those with hydrological connectivity), and also demonstrates the avoidance of the Proposed Wind Farm relating to these sensitive habitats.
	CDP15.19 Woodlands, Trees and Hedgerows It is an objective of Clare County Council:	As detailed in Chapter 3: Consideration of Alternatives of the EIAR, the Proposed Project layout

Topic	Policy / Objectives	Compliance
	a) To preserve and conserve individual or groups of trees identified in Volume 2 of this Plan as 'Trees for Preservation' which will enhance the character and appearance of an area; b) To carry out tree survey work during the lifetime of this Plan to identify future trees of importance in the County and facilitate their future protection; c) To protect individual or groups of trees within the Plan area which are important for environmental, recreational, historical, biodiversity and/or aesthetic reasons or by reason of contribution to sense of place, including groups of trees which correspond with protected habitats, or which support protected species, under the Habitats Directive; d) To work with landowners, local communities and other relevant groups to promote the retention and conservation of existing trees and hedgerows and encourage development proposals that enhance the landscape through positive management and additional planting/sensitive replanting of native tree species; e) To protect woodlands and hedgerows from damage and/or degradation and to prevent disruption of the connectivity of woodlands and hedgerows of the County; f) To ensure, where required, applications for development include proposals for planting / leave a suitable ecological buffer zone, between the development works and areas/features of ecological importance; g) Where hedgerows are required to be removed in the interests of traffic safety or where breaches to hedgerows occur due to river drainage/maintenance works and flood repair, to require the applicant/developer to reinstate the hedgerows with a suitable replacement of native species to the satisfaction of the Council; h) To require each green space in new residential developments to have at least one native oak tree, or other naturalised tree species of similar stature and lifespan, integrated into the agreed planting/landscaping scheme; and To require, where possible, that all trees felled as a result of development proposals be replaced at a minimum ratio of 10 new native species per 1 tree felled.	was designed on a constraints-led basis Chapter 6 and its appendices of the EIAR also details the surveys carried out on the Proposed Project site. There will be no net loss of habitats as a result of the Proposed Project. Trees that have been felled will be replanted.

Topic	Policy / Objectives	Compliance
Landscape	**CDP 14.2 Settled Landscape** It is an objective of the Development Plan: To permit development in areas designated as 'settled landscapes' that sustain and enhance quality of life and residential amenity and promote economic activity subject to: I. Conformity with all other relevant provisions of the Plan and the availability and protection of resources; II. Selection of appropriate sites in the first instance within this landscape, together with consideration of the details of siting and design which are directed towards minimising visual impacts; III. Regard being given to avoiding intrusions on scenic routes and on ridges or shorelines. Developments in these areas will be required to demonstrate: a) That the site has been selected to avoid visually prominent locations; b) That the site layouts avail of existing topography and vegetation to reduce visibility from scenic routes, walking trails, water bodies, public amenities and roads; c) That design for buildings and structures reduce visual impact through careful choice of forms, finishes and colours, and that any site works seek to reduce visual impact.	The Proposed Wind Farm is located in a Settled Landscape. This landscape is described as areas where people live and work comprise the network of farmland, villages and towns that make up the majority of the County. They provide opportunities for enterprise, leisure and personal fulfilment. The Proposed Project has been designed in accordance with the objectives of CDP 14.2. The siting and layout of the Proposed Wind Farm has followed a constraints-led approach as detailed in Section 3.6.1 of Chapter 3 of the EIAR. Furthermore, the Proposed Project has been designed to minimise visual intrusion on the surrounding area which has been fully assessed in Chapter 13 - Landscape and Visual of the EIAR and supported by the comprehensive suite of photomontages included in the Photowire Visualisation Booklet provided at Appendix 14-5 of the EIAR. In summary, the Proposed Wind Farm supports this policy objective by balancing sustainable development with the protection of residential amenity and visual integrity of this landscape.
Architectural Archaeological and Cultural Heritage	**CDP16.1: Archaeology Heritage** It is an objective of Clare County Council: a) To ensure the protection of the architectural heritage of County Clare through the identification of Protected Structures, the designation of Architectural Conservation Areas, the	A robust archaeological assessment is provided in Chapter 13 of the EIAR. The Proposed Wind Farm has also been designed with consideration for the

Topic	Policy / Objectives	Compliance
	safeguarding of historic gardens, and the recognition of structures and elements that contribute positively to the vernacular and industrial heritage of the county; and b) To ensure that the archaeological and architectural heritage of the county is not damaged either through direct destruction or by unsympathetic developments. c) To support and promote architectural vernacular skills training and facilities in the county	recorded monuments of the area. There are no recorded monuments located within the Proposed Wind Farm site. Chapter 13 of the EIAR provides a full assessment of the direct and indirect effects of the Proposed Project on the archaeological and architectural heritage within the study area (i.e. 25km from the proposed turbine locations). This assessment includes a visual assessment of the Proposed Project in relation to monuments/areas of archaeological and architectural heritage. There are no protected structures or Architectural Conservation Areas or historic gardens located within the site of the Proposed Wind Farm. Similarly, no structures listed in the NIAH are located within the Proposed Wind Farm. There are a total of four structures recorded within the 5km study area of the Proposed Wind Farm. All four are also listed in the NIAH building survey. There is also one recorded architectural site situated within the 100m corridor study area for the Proposed Grid Connection Route. It is both a protected structure and a NIAH structure. As detailed in Chapter 13 of the EIAR, following the completion of all construction mitigation measures, there will be no significant residual effects on the archaeological, architectural and cultural heritage resource. This is due to the fact that any archaeological remains located within the proposed

Topic	Policy / Objectives	Compliance
		development area will be identified during archaeological monitoring. This will lead to either their preservation in-situ or by record. As all archaeological remains will be identified and preserved, there will be no significant residual effects. In conclusion, no significant adverse effects are anticipated in relation to any Protected Structures, ACA's or Historic Gardens.

2.5.4.1.1 *Clare Wind Energy Strategy 2023-2029*

County Clare's Wind Energy Strategy 2023-2029 (WES) is included in Volume 6 of the Clare County Development Plan. The Strategy helps to facilitate the development of wind farms by maximising the wind resource of the County having regard to recent technological advances in turbine design, updated information on wind speeds, proximity and availability to grid connections and to changing energy and grid connection regulations, while minimising any environmental and visual impacts. This Wind Energy Strategy allows for the designations of areas as being:

A) 'Strategic,'
B) 'Acceptable in Principle,'
C) 'Open to Consideration,' and
D) 'Not Normally Permissible.

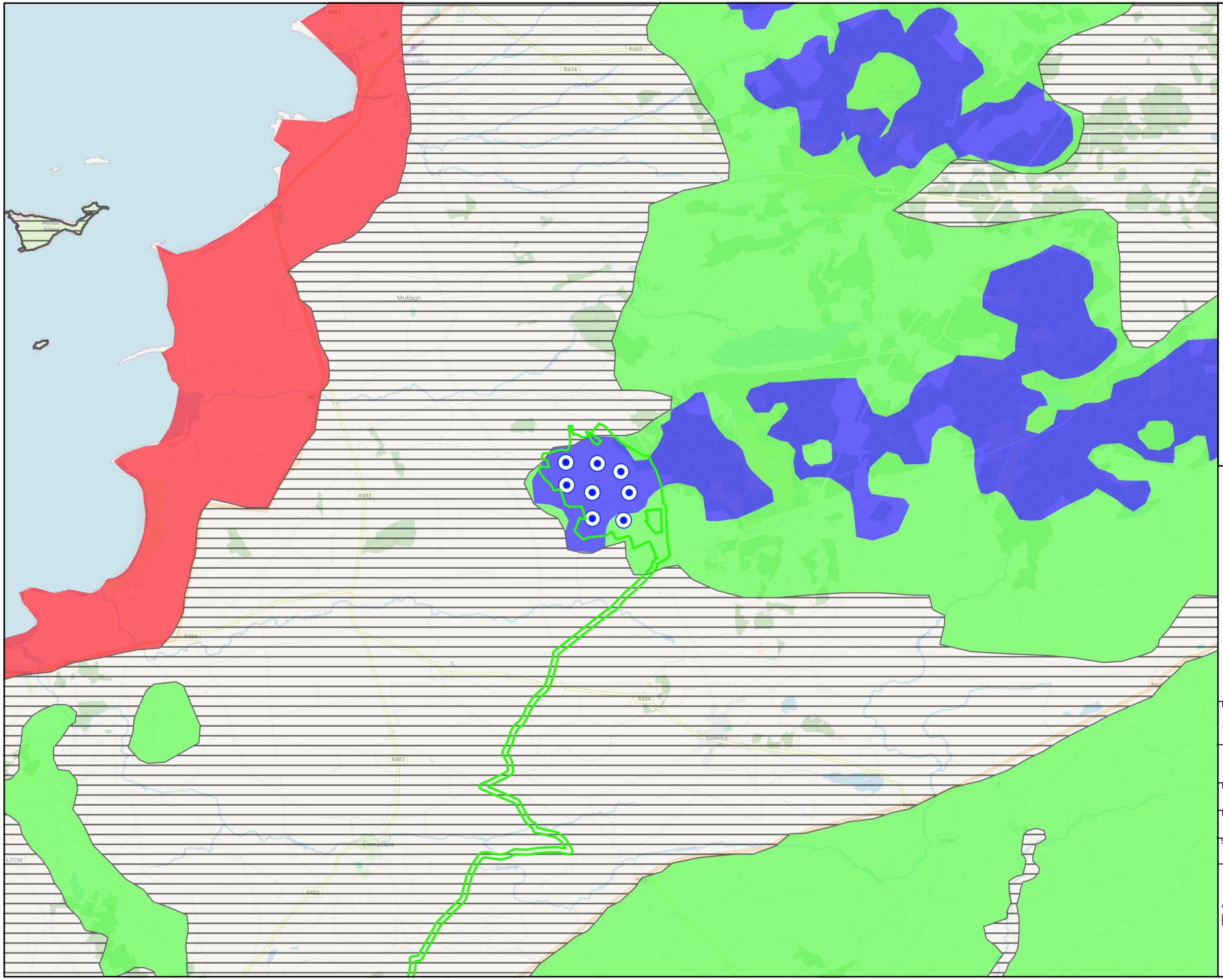
In regard to the Proposed Project, the Proposed Turbine Locations are situated within an area designated as a 'Strategic Area' and 'Acceptable in Principle' area which are considered suitable for wind energy development as outlined in the WES. In addition to these area designations, the Strategy provides general objectives for Wind Energy Developments within the County, which have been listed in **Table 2-3** below

Table 2-3 Objectives of Clare Wind Energy Strategy 2023-2029

Policy Objective	Description	Proposed Project Compliance
WES One: Development of Renewable Energy Generation	It is the objective of the Council to support, in principle and in appropriate scales and locations, the development of wind energy resources in County Clare. It is an objective of the Council to ensure the security of energy supply by accommodating the development of wind energy resources in appropriate areas and at appropriate scales within the County	The Proposed Wind Farm turbines are located within an area designated as a *'Strategic Area' and 'Acceptable in Principle'* which are considered suitable for wind energy development as outlined in the WES. The Proposed Project will support the Council in achieving its objective to ensure the security of energy supply by accommodating the development of wind energy resources.
WES Two: Development of Low Carbon Economy	County Clare will seek to promote itself as moving towards becoming a low carbon County by 2017 as a means of attracting inward investment to the County and the wider MidWest region.	The Proposed Project will support County Clare in towards becoming a low carbon County as it will contribute over 50MW of renewable wind energy generation to County Clare's Wind Energy targets.
WES Three: County Partnership Approach	Clare County Council will seek to promote wind energy in appropriate sites in the County and will work with agencies such as the Clare County Development Board, Clare Enterprise Board, Limerick Clare Energy Agency, Shannon Development, I.D.A and Enterprise Ireland to encourage investment in research and technology associated with wind farms and other renewable energy technology.	Projects such as the Proposed Project support Co. Clare in encouraging investment in research and technology associated with wind farms and other renewable energy technology. By generating renewable energy, wind farms such as the Proposed Project contribute to achieving the long-term goal of replacing fossil fuels with sustainable energy sources. The Proposed Project will contribute over 50MW of renewable wind energy generation to Clare's County Clare's Wind Energy targets.

WES Four: Response to National Policy	The White Paper on Energy has set a target of 40% of electricity to be generated from renewable sources by 2020. In the Mid-West Regional Climate Change Strategy, County Clare is identified as having a potential 600MW energy produced from renewables by 2020. Clare County Council will aim to achieve a minimum target of 550MW from wind energy by the conclusion of this Strategy.	The Proposed Development will contribute up to 57.6MW of renewable wind energy generation to Clare's County Clare's Wind Energy targets.
WES Five: Promotion of Community Involvement	Clare County Council will seek to promote community involvement and require community benefit where possible in wind farm developments.	A Community Liaison Officers (CLO) was appointed as the points of contact for the Proposed Project and has been engaging with the local community. The purpose of the CLO was to introduce the Proposed Project to the local community, engage and establish a line of dialogue with the local community and facilitate one-to-one consultation meetings, or group meetings where requested. Please see Section 2.5.5 of this chapter for further detail on the Community Consultation process.
WES Six: Infrastructure Development Proposals	Proposals for the development of infrastructure for the production, storage and distribution of electricity through the harnessing of wind energy will be considered in appropriate sites and locations, subject to relevant policy, legislation and environmental considerations	The design and layout of the Proposed Project follows the recommendations and guidelines set out in the '*Wind Energy Development Guidelines'* (Department of the Environment, Heritage, and Local Government, 2006), the '*Draft Wind Energy Guidelines* ', ('WEGs') (Department of the Environment, Heritage and Local Government, 2019), and the '*Best Practice Guidelines for the Irish Wind Energy Industry*' (Irish Wind Energy Association, 2008). The Site has been subject to a comprehensive environmental and ecological appraisal to ensure that the Proposed Project does not result in any significant adverse environmental or ecological impacts. A detailed analysis of

		site-specific constraints was carried out in order to inform the placement of the proposed infrastructure. These assessments are mainly included within Chapter 6 of this EIAR however ecological and environmental considerations are included throughout each chapter of the EIAR
WES Seven: Natura 2000 Sites	Having regard to the provisions of the Habitats Directive 92/43/EEC, where a proposed development will give rise to significant adverse direct, indirect or secondary impacts on Natura 2000 sites, (either individually or in combination with other plans or projects), permission will only be granted where there is no alternative solution and where there are imperative reasons of overriding public interest in favour of granting permission, including those of a social or economic nature.	The impact of the Proposed Project on designated sites is considered in full in the EIAR and the NIS. Chapter 6 of the EIAR and NIS conclude that the Proposed Project will not give rise to any significant negative impacts on designated sites.



Map Legend

- EIAR Site Boundary
- Proposed Turbine Location

Clare Wind Energy Strategy (2023-2029)

- Acceptable in Principle
- Not Normally Permissible
- Open to Consideration
- Strategic Areas

Drawing Title: Clare Wind Energy Strategy

Project Title: Cahermurphy West Wind Farm

Drawn By	Checked By
MC	EMC
Project No.	**Drawing No.**
230843	Figure 2-1
Scale	**Date**
1:100,000	08.01.2026

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The Proposed Project's design and layout adhere to the Wind Energy Development Guidelines (2006), the Draft Wind Energy Guidelines (2019), and the Irish Wind Energy Association's Best Practice Guidelines (2008), ensuring compliance with national standards and best practices. Despite unchanged MW targets in the Clare Wind Energy Strategy (WES) since 2009—550 MW for County Clare and 400 MW for Strategic Areas—progress toward these goals has been limited.

The Proposed Project, primarily located within a designated Strategic Area and partially within an Acceptable in Principle (AIP) area, will significantly advance these targets. Its alignment with WES and CCDP objectives demonstrates consistency with local policy and will contribute meaningfully to achieving renewable energy capacity goals in County Clare.

2.5.4.2 Grid Connection

In relation to electricity, the CCDP will facilitate the delivery of a secure and adequate electricity infrastructure to meet the growth in demand and to ensure that an efficient and reliable electricity supply is available to households, business, and industry. The CCDP states that CCC will continue to work closely with EirGrid to facilitate the ongoing development of the grid infrastructure in line with national, regional and local requirements.

Specific relevant policies of the CCDP in relation to the proposed Grid Connection are included in Table 2-4 below.

Table 2-4 Policy Objectives of the CDP in relation to the proposed Grid Connection.

Policy	Description	Proposed Project Compliance
CDP 11.45	***Objective CDP11.45 (Electricity Networks)*** *a) To facilitate improvements in energy infrastructure and encourage the expansion of the infrastructure within the County;* *b) To facilitate future alternative renewable energy developments and associated utility infrastructure throughout the County;* *c) To support the Integrated Single Electricity Market (I-SEM) as a key priority for the Southern Region and the sustainable development and reinforcement of the energy grid including grid connections, transboundary networks into and through County Clare subject to appropriate environmental assessment and planning processes;* *d) To collaborate with EirGrid to facilitate the development of a safe, secure and reliable supply of electricity, enhanced electricity networks and new transmission infrastructure projects that might be brought forward in the lifetime of this Plan under EirGrid's (2017) Grid Development Strategy (subject to appropriate environmental assessment and the planning process);* *e) To collaborate with EirGrid over the lifetime of the plan to ensure that the County's minimum target of 1,167MW of renewable energy generation is achieved and can be accommodated on the electricity network in County Clare; and* *f) To have regard to environmental and visual considerations in the assessment of developments of this nature and ensure compliance with the environmental requirements of Objective CDP3.3 of this plan.*	The Proposed Project includes the provision of 110kVunderground electrical cabling to facilitate the connection and distribution of the renewable energy generated by the Proposed Wind Farm thereby supporting improvements in energy infrastructure and encouraging the expansion of the infrastructure within the County. The Grid Connection, through facilitation of the Wind Farm Site, will contribute towards the national wind energy target of 9GW by 2030. The importance of this application with regards to the climate goals cannot be overlooked.

2.5.4.3 Summary Conclusion on Local Policy for County Clare

Having regard to the above, it is clear there is strong policy support for wind energy development and associated infrastructure at a local level and a commitment to shift to a low carbon economy and away from dependence on imported fossil fuels.

Having regard to County Clare's significant available renewable resources, it is imperative that the County delivers on its renewable energy targets. Clare County Council in the CCDP has set out its intention to take a leading role in respect of renewable energy technology to assist in meeting national, regional and county targets in energy consumption and CO_2 reduction. In this regard, the Council have set the County a minimum target of 1,167MW of renewable energy generation over the lifetime of the plan, with a target of 550MW from wind energy generation.

At present, it is estimated that wind farms in Co. Clare are generating approximately 245MW of electricity demonstrating that there is a significant challenge ahead for the Council if it is to deliver on its renewable energy targets from wind energy developments. The Proposed Project, which is appropriately located for wind energy development having regard to the WES, will make a meaningful contribution towards the renewable energy targets for the County.

As noted above, the Proposed Project is located in an area that is designated as a *Strategic Area* and on lands designated as *Acceptable in Principle*, both of which are recognised as suitable for wind energy development subject to environmental considerations and compliance with relevant development management standards.

Accordingly, with regards to the supportive local policy context, the suitability of both WES designations for wind energy development and the contribution which the Proposed Project will make towards achieving the County's set renewable energy targets, the principle of wind energy development at this location is considered to be acceptable, in compliance with the Wind Energy Strategy and wider objectives of the CCDP and represents proper planning and sustainable development in the functional area of CCC.

2.5.5 Other Relevant Onshore Wind Energy Planning Policy Publications

Ireland's onshore wind planning policy is guided primarily by the Wind Energy Development Guidelines (2006), which aim to ensure proper planning and consistency in identifying suitable locations for wind projects. While these remain the current statutory guidelines, updated standards and draft guidelines published in 2019 are under review, focusing on stricter noise limits, visual setback requirements (four times turbine height), elimination of shadow flicker, and enhanced community engagement obligations. Circular PL5/2017 advises local authorities to maintain existing policies until the review is complete. The draft guidelines emphasize sustainable development, landscape impact, and community benefit measures, and the Proposed Project has incorporated these principles, including setback compliance and a standalone community report. Concerns raised during consultation include feasibility of noise and shadow flicker provisions. Additionally, the DCCAE Code of Practice (2016) mandates best-practice community engagement throughout all project stages. Overall, the Proposed Project aligns with current and emerging policy requirements for wind energy development in Ireland.

The guidelines advise that ignoring or poorly managing community concerns can have long-term negative impacts on a community's economic, environmental or social situation. Not involving communities in the project development process has the potential to impose costly time and financial delays for projects or prevent the realisation of projects in their entirety.

The specifics of these policies are set out in detail within Appendix 1 of the Planning Report which is included as part of these planning applications.

2.6 Scoping and Consultations

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

A scoping report, providing details of the Proposed Project, was prepared by MKO and circulated to prescribed statutory bodies in March and April 2024. The scoping document provided details of the Proposed Project and set out the scope of work for the EIAR. Consultees were invited to contribute to the EIAR by suggesting baseline data, survey techniques and potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR.

2.6.1 Scoping Responses

Table 2-5 below lists the responses received to the scoping document circulated. Copies of all scoping responses received are included in Appendix 2-1 of this EIAR. The recommendations of the consultees have informed the scope of the assessments undertaken and the contents of the EIAR. If further responses are received, the comments of the consultees will be considered in the construction, operation and decommissioning phases of the Proposed Project in the event of both planning permissions being granted. Those bodies engaged with at the scoping stage are set out below, in Table 2-5.

Table 2-5 Scoping Responses

No.	Consultee	Date of Response
1	2rn (RTÉ Transmission Network Ltd.)	02/07/2024
2	Aviation Navigation Ireland	No response received
3	Bat Conservation Ireland	No response received
4	An Taisce	No response received
5	Birdwatch Ireland	No response received
6	Broadcasting Authority of Ireland	02/07/2024
7	Cellnex	03/06/2024
8	Commission for Communications Regulation	No response received
9	Commission for Regulation of Utilities, Water and Energy	No response received
10	Department of Agriculture, Food and the Marine	08/05/2024
11	Department of Communications, Climate Action and the Environment	No response received
12	Department of Defence	08/04/2024
13	Department of Housing, Local Government and Heritage	17/05/2024
14	Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media	No response received
15	Department of Transport, Tourism and Sport	05/02/2024
16	Eir	08/02/2024
17	EirGrid	No response received
18	Enet Telecommunications Networks Limited	10/04/2024
19	ESB Telecoms	No response received
20	ESB Networks	05/04/2024

No.	Consultee	Date of Response
21	EOBO Ltd	No response received
22	Fastcom Broadband Limited	No response received
23	Failte Ireland	23/04/2024
24	Forest Service	05/04/2024
25	Geological Survey of Ireland	16/04/2024
26	Health Service Executive	13/05/2024
27	Imagine Group Communications	07/02/2024
28	Irish Water (Telecoms)	No response received
29	Ivertec Ltd	No response received
30	Iarnród Éireann	10/04/2024
31	Irish Peatland Conservation Council	No response received
32	Inland Fisheries Ireland	05/04/2024
33	Irish Aviation Authority	17/04/2024
34	Irish Red Grouse Association - Conservation Trust	14/05/2024
35	Irish Raptor Study Group	No response received
36	JFK Communications Ltd	No response received
37	Lackabeha Services Ltd T/A Airwaves Internet	No response received
38	Whizzy Internet Limited	07/03/2024
39	Sport Ireland	No response received
40	Uisce Éireann	18/04/2024
41	Office of Public Works	No response received
42	Irish Wildlife Trust	No response received
43	Clare County Council - Planning Department	No response received
44	Clare County Council - Roads Environment and Water Services Department	No response received
45	Clare County Council - Roads and Transportation Department	No response received
46	Southern Regional Assembly	No response received
47	Sustainable Energy Authority of Ireland	No response received
48	TETRA Ireland Communications Ltd.	No response received
49	The Heritage Council	No response received
50	Transport Infrastructure Ireland	12/04/2024
51	Three Ireland Ltd.	07/02/2024
52	Towercom	No response received
53	Virgin Media Ltd (previously UPC)	No response received
54	Viatel Ireland Ltd.	No response received
55	Vodafone Ireland Ltd.	07/03/2024
56	Waterways Ireland	05/04/2024
57	Shannon Airport	08/02/2026

Table 2-6 below provides a summary of the details of the responses received from the consultees. The table also identifies the relevant section of the EIAR where the points raised by each of the consultees are addressed.

Table 2-6 Summary of responses received from Consultees.

Consultee	Response Received	Response Summary	Addressed in Chapter
2rn (RTÉ Transmission Network Ltd.)	02/07/2024	2rn have no fixed linking in the area, however, there is a risk of interference to broadcasting services. As a result, a protocol is to be signed between the developer and 2rn, should the development proceed.	Chapter 15 Material Assets
Broadcasting Authority of Ireland	02/07/2024	Coimisiún na Meán does not perform an in-depth analysis of the effect of wind turbines on FM networks. However, the proposed windfarms are not located close to any existing or planned FM transmission sites.	N/A
Cellnex	03/06/2024	Cellnex do not have any telecoms installation in the affected area, however the ComReg map should be referred to, in case other towers or operators are affected.	Chapter 15 Material Assets
Department of Agriculture, Food and the Marine	08/05/2024	If the Proposed Project will involve the felling or removal of any trees, the developer must obtain a Felling License from this Department before trees are felled or removed. It is important to note that when applying to a Local Authority, or An Coimisiún Pleanàla, for planning permission where developments are: a) subject to an EIA procedure (including screening in the case of a sub-threshold development) and any resulting requirement to produce an EIAR; and/or b) subject to an Appropriate Assessment procedure (including screening) and any resulting requirement to a Natura Impact Statement (NIS); and c) the Proposed Project in its construction or operational phases, or any works ancillary thereto, would directly or indirectly involve the felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species.	Chapter 6 Biodiversity
Department of Defence	08/04/2024	All turbines should be illuminated by Type C, medium intensity, fixed red obstacle lighting with a minimum output of 2,000 candela to be visible in all direction of azimuth and to be operational H24/7 days a week. Any Irish Air Corps (IAC) requirements for are separate to Irish Aviation Authority (IAA) require We would appreciate if you could keep us informed on any progress relating to this Proposed Project.	Chapter 15 Material Assets
Department of Housing, Local Government and Heritage	17/05/2024	Archaeology: Visual Impact Assessment should - * Set out the key characteristics of the monument(s) and its surroundings that contribute to its setting and the degree to which this setting is integral to the significance and appreciation of the monument.	Chapter 13 Cultural Heritage Chapter 14 Landscape

Consultee	Response Received	Response Summary	Addressed in Chapter
		*Assess the effects of the development—both positive and negative—on these key characteristics. The development should be considered in terms of its location and siting relative to the monument as well as its form, appearance and permanence. * Be supported by appropriate illustrations of the monument, its setting and the development.	
Department of Transport, Tourism and Sport	05/02/2024	Where the developer proposes the placement of any cables (or additional cables) in one or more trenches within the extents of the (regional and local) public road network, it is necessary to consider the following: • Their presence within the public road will likely significantly restrict the Road Authority in carrying out its function to construct and maintain the public road and will likely add to the costs of those works post construction. • Their installation within the lands associated with the public road may affect the stability of the road. In particular where the road is a "legacy road" (where there is no designed road structure, and the subgrade may be poor or poorly drained) the design needs to take account of all the variable ground conditions and not be based on a sample of the general soil conditions. • The possible effect on the remaining available road space (noting that there may be need to accommodate other utilities within the road cross-section in the future). • The necessity to have the power in the cables switched off where the Road Authority considers this necessary in order to carry out its function to construct and maintain the public road.	Chapter 4 Description Chapter 15 Material Assets
Eir	08/02/2024	Eir have no transmission links within the proposed area, and it has no risk to the network.	N/A
Enet Telecommunications Networks Limited	10/04/2024	Enet Telecommunications have one link passing through this area. It is 7GHz and set back about 50m, no issues raised with Enet and links.	Chapter 15 Material Assets
ESB Networks	05/04/2024	Scoping request has been acknowledged by ESB, no further response received.	N/A
Failte Ireland	23/04/2024	Fáilte Ireland's response to MKO scoping included the attachment of Fáilte Ireland's Guidelines for the Treatment of Tourism in an EIA, information for the preparation of the Environmental Impact Assessment for the proposed project is included within the guideline documentation. The purpose of this report is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism.	Chapter 5 Population and Human Health

Consultee	Response Received	Response Summary	Addressed in Chapter
		These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2.	
Forest Service	05/04/2024	Scoping request has been acknowledged by Forest Service, no further response received.	N/A
Geological Survey of Ireland	16/04/2024	Survey Ireland would encourage use of and reference to our datasets. Geoheritage, Groundwater, Geological mapping, Geohazards, Natural resources (Minerals/aggregates), Guidelines. Should development go ahead, all other factors considered, Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out. The data would be added to Geological Survey Ireland's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to the Geological Mapping Unit, at mailto:GeologicalMappingInfo@gsi.ie, 01-678 2795	Chapter 8 Land, Soils and Geology Chapter 9 Hydrology and Hydrogeology
Health Service Executive	13/05/2024	A visit to the Proposed Project site was carried out by a SEHO on the 15th April 2024. As a result of this visit, it is important that the following are specifically considered in the EIA: a) Any likely significant effect on Cahermurphy National school located to the southeastern boundary of the proposed site. This includes any likely significant impacts from noise and emissions to air at both the construction and operational phase. Also, any likely significant impacts from construction traffic during the day and particularly at the start and end of the school day. b) The impact on the local roads during the construction phase. The roads are narrow country roads, and the EIA should include a detailed traffic impact assessment that includes impacts on local road usage at different times of the day and different days of the week. c) Any likely significant effect on Doolough Lake through any hydrological connections and any likely significant effect on drinking water supplies. Doolough is the source of both West Clare New and Old Regional Rural water supplies. Both water treatment plants are operated by Uisce Eireann. The National Environmental Health Service (EHS) recommends that the following matters are included and assessed in the EIAR • Public Consultation • Decommissioning phase of the proposed wind farm • Siting and location of turbines • Noise & Vibration • Shadow Flicker • Air Quality	Addressed throughout the EIAR.

Consultee	Response Received	Response Summary	Addressed in Chapter
		• Surface and Groundwater Quality • Geological Impacts • Ancillary facilities • Cumulative impacts	
Imagine Group Communications	07/02/2024	Imagine Group, at the time of response, do not have any microwave links affected by the development.	N/A
Iarnród Éireann	10/04/2024	Iarnród Éireann have outlined that the proposed site is within the co-ordination zone whereby coordination between operators is necessary to fix any issues and impacts on the signal propagation. IÉ will monitor the network and will revert back with any issues that may be identified once construction has begun.	Chapter 15 Material Assets
Inland Fisheries Ireland	05/04/2024	Scoping request has been acknowledged by Inland Fisheries Ireland, no further response received.	N/A
Irish Aviation Authority	17/04/2024	In general terms, the IAA has no specific requirements for inclusion in the scoping reports based on the very high-level information presented. More formal observations can be provided when an indicative scheme of turbine coordinates and positions / blade tip heights are available. If a formal planning application is progressed, subject to Air Nav Ireland and Shannon Airport Authority advising no concerns over the proposed wind farm, it is likely that the following general observations would be proffered by the Authority during the planning process: In the event of planning consent being granted, the applicant should be conditioned to contact the Irish Aviation Authority to: (1) agree an aeronautical obstacle warning light scheme for the wind farm development, (2) provide as-constructed coordinates in WGS84 format together with ground and blade tip height elevations at each wind turbine location and (3) notify the Authority of intention to commence crane operations with at least 30 days prior notification of their erection.	Chapter 15 Material Assets
Irish Red Grouse Association - Conservation Trust	14/05/2024	We are making this submission on behalf of our members and supporter as well as the native flora and fauna of the island of Ireland. The IRGCT fully supports the governments drive for renewable energy but feels mitigation efforts should be significantly increased to help combat the damage that anthropogenic activities are causing to our planet. In light of the climate and biodiversity emergency that Ireland now faces, the IRGCT finds it extremely pertinent that funds from lucrative renewable energy developments should be put in place to achieve a net biodiversity gain during and after the development of such a site.	Chapter 6 Biodiversity Chapter 7 Ornithology

Consultee	Response Received	Response Summary	Addressed in Chapter
		One such example could be to employ local contractors to conduct sensitive habitat management work coupled with nest protection efforts as this combination of land management options are scientifically proven to increase wading bird productivity three-fold. Forestry England is now employing personnel to control generalist predators such as foxes and crows, the number one driver of ground nesting bird species declines, on many of their sites. The IRGCT strongly believes Bord na Móna, Coillte and other large landowners across Ireland should also adopt these forward-thinking conservation measures as without it, numerous species face imminent extinction in less than 10 years. Many red listed species like curlew and lapwing, all of which reside on or around the Cahermurphy area of Co. Clare, are vanishing in front of our very eyes. The question is will large renewable energy companies responsible for delivering positive change for the people of Ireland, stand by and support this wipeout of our natural heritage or will they stand together for the protection and preservation of our precious natural environments through meaningful practical land management actions that delivers tangible results on the ground.	
Shannon Airport	08/02/2026	The locations of the turbines are approx. 6km from the perimeter of our safeguarding boundary. Therefore technically they are not impacting the Obstacle Limitational Surfaces (OLS). The closest area within that boundary has a height restriction of between 15m and 45m. This is only one aspect of a combined required assessment process and consideration of potential impacts on Instrument Flight Procedures (IFP's) and NAVAIDS/Radar is also required. You should make contact with Air Nav Ireland Ltd. to seek their perspective.	Chapter 15 Material Assets
Whizzy Internet Limited	07/03/2024	Whizzy Internet Limited does not have any links in the area.	N/A
Uisce Éireann	18/04/2024	Uisce Éireann will review the finalised planning referral, when complete.	N/A
Transport Infrastructure Ireland	12/04/2024	The developer should have regard, inter alia, to the following: • Consultations should be had with the relevant Local Authority/National Roads Design Office, with regard to the locations of existing and future national road schemes. • TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the Proposed Project, including the potential haul route. • The developer should assess visual impacts from existing national roads.	Chapter 15 Material Assets

Consultee	Response Received	Response Summary	Addressed in Chapter
		• The developer should have regard to any EIAR/EIS and all conditions and/or modifications imposed by An Coimisiún Pleanála regarding road schemes in the area. The developer should, in particular, have regard to any potential cumulative impacts. • The developer, in preparing EIAR, should have regard to TII Publications (formerly DMRB and the Manual of Contract Documents for Road Works). • The developer, in preparing EIAR, should have regard to TII's Environmental Assessment and Construction Guidelines, including the 'Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes' (National Road Authority (NRA), 2006). • The EIAR should consider the 'European Communities (Environmental Noise) Regulations, 2018, (S.I. no. 549 of 2018)', and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see 'Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes (NRA, 2014)'). • It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site, with reference to impacts on the national road network and junctions of lower category roads with national roads.	
Three Ireland Ltd.	07/02/2024	Three Ireland does not have any transmission in the area.	N/A
Vodafone Ireland Ltd.	07/03/2024	Vodafone Ireland does not have any transmission in the area.	N/A
Waterways Ireland	05/04/2024	No comment, as not the Proposed Project is not within any zone of influence.	N/A

2.6.2 Other Consultations

2.6.2.1 Pre-Planning Meetings

2.6.2.1.1 *Clare County Council*

Members of the project team and the Applicant met with representatives from Clare County Council in accordance with Section 247 of the Planning and Development Act 2000 (as amended) (the Act) via MS teams on the 6th November 2024.

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

- An introduction to the Applicant.
- A high-level overview of the Proposed Project, the Subject Site and the reasons for Refusal of Cahermurphy II Wind Farm.
- Overview of relevant planning policy including compliance with local wind energy policy.
- Provided specific details of the scheme relating to LVIA, Ecology and Aviation.
- Set out the scope of the Environmental Impact Assessment Report to be undertaken.
- Discussed scoping & pre-application/public consultation undertaken to date.
- Set out the projected project timelines.

2.6.2.2 An Coimisiún Pleanála

2.6.2.2.1 *Section 37B Consultation*

The Applicant engaged with ACP under the provisions of Section 37B of the Planning and Development Act 2000 (as amended), as to whether the Proposed Project would meet the thresholds of the Seventh Schedule of the Planning and Development Act, 2000, as amended.

First Meeting

The applicant opened consultations with ACP in August 2024 in relation to a Proposed Project comprising of 8 no. wind turbines and associated infrastructure in the townland of Cahermurphy in Co. Clare and an on-site substation and associated works, including underground cabling to connect to the National Grid.

A SID meeting under the provisions of Section 37B was held with ACP on the 11th of August 2024.

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

- A High-level overview of the Proposed Project and the Subject Site.
- Introduction to the applicant.
- Overview of planning policy including compliance with local wind energy policy.
- Provided specific details of the scheme relating to LVIA, Ecology and Aviation.
- Set out the scope of the Environmental Impact Assessment Report to be undertaken.
- Discussed scoping & pre-application/public consultation undertaken to date.
- Set out the projected project timelines.
- Discussed the relevant Strategic Infrastructure Development criteria as set out in the Seventh Schedule of the Act.

Second Meeting

A second meeting was also held in December 2025 with ACP in response to the Transposition of the Renewable Energy Directive (RED III) into Irish law through the European Union (Planning and Development) (Renewable Energy) Regulations 2025. The design team gave an overview of the Wind Farm element of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- Update on Development Proposal
- Policy Context
- Environmental Considerations with particular reference to:
  - Biodiversity
  - Hydrology and Hydrogeology, ground / peat stability.
  - Ornithology
  - Noise
  - Cumulative impact (with particular regard to noise, landscape and ornithological impacts arising from proximity to existing Windfarms)
  - Impact on Shannon Airport
  - Turbine delivery Route
  - Other Material Assets
- Consideration of Connectivity to European Sites
- Consultations
- Consideration of the presentation of documents
- Other considerations

SID Close Out

On the 5th January 2025, MKO, on behalf of the Applicant, sought to close the consultation process with ACP. On the 9th of February 2026, ACP wrote to the Applicant and confirmed that consultation was closed and that the Wind Farm Site was considered to be strategic infrastructure within the meaning of Section 37A and such any application for approval of the Wind Farm Site should be made directly to ACP.

2.6.2.2.2 *Section 182E Consultation*

First Meeting

The Applicant engaged with ACP under the provisions of Section 182E of the PDA and a meeting was held on the 29th August 2023. This was in respect of the construction of proposed 110kV Infrastructure and Connection at the Existing 400kV Moneypoint Substation in relation to Cahermurphy West Wind Farm.

- The Applicant
- Background
- The Proposed Development
- Proposed 110kV Grid Connection Route Options
- Policy Context
- Environmental Assessment
- S.182A Criteria
- Scoping/Public Consultation
- Proposed Project Timeline
- Feedback & Discussion

Second Meeting

A second meeting was also held on the 19th September 2024 with An Coimisiún Pleanála where the design team gave an overview of the Grid Connection element of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- The Applicant
- Background
- Project Overview
- The Proposed Grid Connection and Cable Trench Detail
- Planning Policy
- Environmental Assessment
- S.182A Criteria
- Scoping/Public Consultation
- Proposed Project Timeline

SID Close out

On the 15th October 2025 MKO, on behalf of the Applicant, sought to close the consultation process with ACP. On the 27th November 2025 ACP wrote to the Applicant and confirmed that consultation was closed and that any application for approval of the transmission development should be made directly to ACP.

2.6.2.2.3 *Section 37CC(1) Consultation*

The Applicant also engaged with ACP under the PDA in respect of the level of design flexibility to be included in the application (as defined in 15I of the Planning and Development Regulations 2001, as amended ("the Regulations") as "opinion on unconfirmed details"). This flexibility meeting request was made in accordance with the recently commenced (S.I No. 645 of 2023) legislative provisions relating to design flexibility introduced by the Planning and Development, Maritime and Valuation (Amendment) Act 2022. The legislation provides for a process whereby prospective applicants may request a meeting with ACP for the purpose of receiving an opinion as to whether it is appropriate that an application for permission be made before certain details of the Proposed Project are confirmed.

A meeting under Section 37CC(1) Consultation was held with ACP on the 2nd December 2025(Case Reference ACP Ref. 323567-25). The design team gave an overview of the details unlikely to be confirmed at application lodgement, which were set out as follows:

- Turbine total tip height
- Turbine rotor diameter
- Turbine hub height

The parameters within which the turbine specifications will fall were set out as follows:

- Total tip height range of 180m – 185m
- Rotor diameter range of 149m – 163m
- Hub height range of 98.5m to 110.5m

It was also explained to ACP that the design flexibility requirement arises as the exact make and model of the turbine cannot be confirmed prior to making the application as this will be dictated by a competitive tender process of the various turbines on the market at the time of procurement and construction, which necessitates the requirement for associated unconfirmed details to be included in the application.

A design flexibility opinion was issued by ACP on the 9th of February 2026 and accompanies the Wind Farm 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.

2.6.2.3 Consultation with the National Parks and Wildlife Services (NPWS)

On the 21st of October 2025 MKO contacted the NPWS requesting a meeting with the potential baseline ecological data, potential ecological impacts associated with the Proposed Project, as well as proposed biodiversity and ornithology enhancement measures (see Appendix 7-8 for further details). In the absence of an official response to this meeting request, MKO once again contacted the NPWS on the 8th of December 2025 requesting a meeting. On the 20th of January 2026, the MKO received a response from the NPWS accepting a meeting on the Proposed Project for the 28th of January 2026. The meeting agenda was as follows:

- Introduction to the Proposed Project
- Ecological surveys, baseline data and appropriate assessment
- Ornithological surveys and baseline data
- Proposed Hen Harrier Offsetting and Enhancement Measures
- Open Discussion on the Proposed Project

The discussion on the Proposed Project primarily related to the Hen Harrier Offsetting and Enhancement Plan, with the NPWS highlighting some key aspects they would like to see included within the Plan, namely a monitoring plan for parameters and indicators of enhancement success at farmland enhancement areas, address the issue of nest predation within the hen harrier offsetting and enhancement lands and correct characterisation of impacts on hen harrier. These suggestions, along with all suggestions outlined by the NPWS have been addressed comprehensively in Chapter 6, 7 and Appendix 7-8 of this EIAR.

2.6.3 Community Consultation

The Community Liaison Strategy for the Proposed Project was based around engaging with the local community in an open, honest and transparent manner with the aim of not only to provide clear and understandable information but also to gain feedback to understand the views of the local community. This feedback and information were used to inform the design process.

A number of Community Liaison Officers (CLO) were appointed as the point of contact for the Proposed Project and have been engaging with the local community. The purpose of the CLO's was to introduce the Proposed Project to the local community, engage and establish a line of dialogue with the local community and facilitate one-to-one consultation meetings, or group meetings where requested. The CLO's also disseminate information on the projects to the local community as the project progresses through door-to-door leaflet drops and informal meetings.

The CLO's and the Project Manager for the Proposed Project have spent significant time at one-to-one and group meetings in the local community. Contact details were provided for local residents to get in touch with any queries or comments regarding the design and assessment of the Proposed Project. The CLO's will continue to liaise with the community as the Project progresses.

The consultation process commenced in June 2024 when the CLO's visited all residential dwellings within 2km of the project to provide information in the form of a detailed brochure and record any issues raised by members of the local community. A number of dwellings outside of the 2km radius were also visited where an interest in the Proposed Project was expressed.

On the 27th of June 2024, a public information event was held in Kilmihil village. This was to further introduce the Proposed Project and brief the local residents on way to get involved and provide feedback. This event also provided an opportunity for residents to ask any questions they had about the Proposed

Project. A further public event was held in Kilmihil village on the 27th of August 2025. This event was held to inform the local residents of the expected final wind farm design, showcase photomontage booklets, as well as the community benefits that the Proposed Project would provide.

As part of the Proposed Project, a comprehensive Public Consultation Report has been prepared and is included in Appendix 2-3 in line with the Draft Revised Wind Energy Development Guidelines (2019) which states the following:

> *"In order to promote the observance of best practice, planning authorities should require applicants to prepare and submit a Community Report with their planning application and a condition on any subsequent planning permission should require developers to carry out the development in accordance with the approved Community Report".*

In summary, the report was prepared to record the consultation carried out with the local community in respect of the Proposed Project. The objective of the consultations was to ensure that the views and concerns of all were considered as part of the Proposed Project design and Environmental Impact Assessment (EIA) process.

This report outlines the consultation and community engagement initiatives undertaken by the applicant prior to the submission of the planning application. It also outlines the main issues identified during this process, how the final proposal reflects community consultation and the steps taken to ensure that the Proposed Project will be of enduring economic benefit to the communities concerned.

2.7 Cumulative Impact Assessment

The EIA Directive and associated guidance documents state that as well as considering any direct, indirect, secondary, transboundary, short, medium and long term, permanent and temporary, positive and negative effects of the project, the description of likely significant effects should include an assessment of likely significant effects that could arise cumulatively with other plans and projects. The factors to be considered in relation to cumulative effects include population and human health, biodiversity, land, soil, water, air, climate, material assets, landscape, and cultural heritage as well as the interactions between these factors.

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

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

2.7.1 Methodology for the Cumulative Assessment of Plans and Projects

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

The cumulative impact assessment of projects has three principle aims:

1. *To establish the range and nature of existing and approved projects within the cumulative impact study area of the Proposed Project.*

2. *To summarise the relevant projects which have a potential to create cumulative impacts.*
3. *To identify the projects that hold the potential for cumulative interaction within the context of the Proposed Project and discard projects that will neither directly nor indirectly contribute to cumulative impacts. (Note: this is done by individual competent experts with respect to their specialist area of expertise.)*

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

2.7.2 Establishing the Cumulative Long List

To establish a long list of existing, permitted and proposed projects to be included in the cumulative impact assessment, cumulative study areas were established for each individual topic area in the EIAR. Following consultation with the EIAR team on each individual topic, the maximum geographical extent of each cumulative study area and justification for this extent was established and is presented in Table 2-7 below. Each cumulative study area was established with regard for the potential environmental receptors, potential impact pathways, topic specific guidance, best practice and professional judgement.

Table 2-7 Cumulative Assessment Study Areas

Individual Topic	Maximum Extent	Justification
Population & Human Health	Population study area (District Electoral Divisions within which the Proposed Wind Farm site is located.) Shadow Flicker (10x RD buffer from proposed turbines)	The Study Area for the population study in Chapter 5 is the Electoral Divisions where the Proposed Project is located. This Study Area for Population identified is considered for cumulative effects on population. For the assessment of cumulative shadow flicker, any other existing, permitted or proposed wind farms are considered where their ten times rotor diameter shadow flicker study area are located within the Shadow Flicker Study Area of 1.63km (ten times the rotor diameter from the maximum blade length of the proposed turbines) for the Proposed Project.
Biodiversity - Flora and Fauna	10km from the EIAR Site Boundary 200m from the grid underground electrical cabling route. Consideration for the Biodiversity cumulative extent is also given to the Birds and Water Cumulative geographical boundaries.	Using the precautionary approach and given the nature and scale of the Proposed Project, the geographical boundary for terrestrial ecological aspects, i.e. habitats, is 10 km for cumulative assessment for the Proposed Wind Farm and 200 m from the Proposed Grid Connection.
Biodiversity - Birds	25km from the proposed turbines for large infrastructural development, such as wind farms, energy and public transport developments.	NatureScot guidance '*Assessing the Cumulative Impacts of onshore Wind Energy Developments*' (SNH, 2012; 2018) was consulted while undertaking the cumulative assessment. SNH (2012;

		2018) emphasises that its priority is to '*maintain the conservation status of the species population at the national level.*' However, it is acknowledged that consideration should also be allowed for impacts at the regional level *'where regional impacts have national implications (for example where a specific region holds the majority of the national population)'.* Following the guidance of SNH (2012), the cumulative impact assessment has been carried out at the scale of the importance rating of the receptor. A 25km radius of the Proposed Wind Farm site turbines was considered a reasonable approximation of the size of a county and a 5km radius of the Proposed Wind Farm site turbines was considered a reasonable approximation for the local level.
Biodiversity - Bats	10km from proposed turbines.	A 10km buffer of the proposed turbines is used as is recommended for the desktop study and cumulative assessment by NatureScot Guidelines 2021.
Land, Soils and Geology	EIAR Site Boundary	As there is no pathway for offsite cumulative impacts for Land, Soils and Geology, therefore, the cumulative study area is the EIAR Site Boundary.
Water	Anngeeragh River, Creegh River, Doonbeg River, Crompaun River and Wood River catchments.	These four catchments have been chosen to represent the water Study Area due to the fact that the Proposed Project contains works in each of these catchments. The Proposed Wind Farm only occupies the Anngeeragh River and Creegh River catchments, with the Proposed Grid Connection also passing through the other catchments as listed.
Air Quality	Air Quality cumulative Study Area is 1km from Proposed Project.	Given dust particles do not generally travel greater than 500m from source (*Guidance on the Assessment of Mineral Dust Impacts for Planning*, IAQM 2016) the geographical boundary for the cumulative dust impact is 500m. In line with the TII Publication Air Quality Assessment of Proposed National Roads – Standard PE-ENV-

		01107, December 2022, a geographical boundary of 1km was used for cumulative air quality assessment.
Climate	The Climate assessment has been considered on a national basis and not confined to a specific study area.	The Climate assessment has considered the cumulative effects of the Proposed Developments with other developments on a national basis and within the context of the national Carbon Budget and relevant sectoral emissions ceiling.
Noise and Vibration	The list of wind farms which were initially considered in cumulative assessment extended to 10km of the proposed wind farm turbines. 200m from Grid Connection underground electrical cabling route.	The geographical boundary for the cumulative noise assessment is the area within which noise levels from the proposed, consented and existing wind turbine(s) may exceed 35 dB LA90 at up to 10 m/s wind speed (Institute of Acoustics document *Good Practice Guide To The Application Of Etsu-R-97 For The Assessment And Rating Of Wind Turbine Noise*).
Cultural Heritage	5km buffer from the EIAR Site Boundary. 50m buffer either side of the Grid Connection and TDR	Cumulative impacts on setting are more likely to occur at the operational stage of the development (i.e. post-construction). In this regard in order to assess overall cumulative effects on archaeology and cultural heritage the Proposed Project is considered in the context of other developments, in particular other permitted and proposed wind farms within 5km of the Site.
Landscape & Visual	25km buffer from proposed turbines for effects on landscape character. 15km from proposed turbines for effects on landscape character.	The Wind Energy Development Guidelines (2006), require that *"in areas where landscapes of national or international renown are located within 25 km of a proposed wind energy development, the Zone of Theoretical Visibility should be extended as far (and in the direction of) that landscape".* The Burren and Cliffs of Moher UNESCO Global Geopark is located within 25km of the Proposed Wind Farm, and therefore the cumulative boundary for visual and landscape effects is maintained at 25km buffer from the proposed turbines.. The Landscape Character Areas (LCA) Study Area has been chosen as 15 kilometres for effects on landscape character. Through experience conducting LVIA for other wind energy development projects, the assessment team determined that no significant effects on landscape character are likely

		to arise beyond distances of 15km from the proposed turbines. Therefore, a LCA Study Area of 15km is deemed appropriate for effects on landscape character in relation to the assessment of effects upon designated Landscape Character Areas.
Material Assets: Traffic & Transport	25km buffer from proposed turbines for large infrastructural developments such as wind farms, energy and public transport developments. Following that, the proposed transport route for each project is considered.	Informed by traffic modelling scenario and the area of influence the Proposed Project has on changing traffic volumes. The potential cumulative traffic effects with the Proposed Project are assessed on the following criteria; › Project status (proposed to operational) › Degree of overlap with the Proposed Project delivery highway network (low to high) › Traffic volumes (low to high) The geographical boundary for the traffic and transport cumulative assessment is defined by the potential for other projects to overlap with the Proposed Project delivery highway network, and so a 25km buffer from turbines is deemed appropriate to capture other plans and projects with the potential for cumulative effects with the Proposed Project. Please refer to Chapter 15 Material Assets for further details on the cumulative assessment methodology.
Material Assets: **Telecoms**	The list of wind farms and other projects which were initially considered in cumulative assessment extended to 25km from the proposed turbines.	The geographical boundary for the telecoms cumulative assessment is defined by the potential for other wind farm projects to interfere with broadcast signals that interact with the Proposed Project.

Once the cumulative study areas were identified and justified, a search was conducted across various platforms and databases in order to compile a list of projects and ongoing activities in the area. The sources used to establish the cumulative long list are provided in **Table 2-8** below. The data was first compiled spatially through a Geographic Information System (GIS). The spatialised data was then exported into a list for further scrutiny and review. This formed the cumulative long list provided in **Appendix 2-2**.

The maximum extent of each cumulative search buffer was determined by the largest specific cumulative study area buffer (25km from EIAR Site Boundary), as shown in **Table 2-7** above. All EIAR chapters did not use the maximum extent of the largest buffer. In instances where a specific chapter's cumulative study area was smaller than the cumulative search maximum extent, the cumulative long list was filtered by

distance to infrastructure/boundary, creating a chapter specific long list unique to each cumulative study area set out in **Table 2-7** above.

Table 2-8: Data sources used for long list compilation

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

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

2.7.3 Projects Considered in the Cumulative Impact Assessment

2.7.3.1 Planning Applications & Permissions

A search was conducted using data from CCC and ACP's planning portals to search for all planned and/or permitted planning applications within 25km of the application site boundary. Planning applications considered within this boundary include all live/extant permissions available on the various online portals mentioned above. This distance was chosen as it is considered that cumulative impacts would not exist with any development proposed/permitted greater than 25km from the Proposed Wind Farm and 1km from the Proposed Grid Connection Route.

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

2.7.3.2 EPA Licenced Activities

EPA licensed activities refer to industrial and waste management operations that require a license from the Environmental Protection Agency under various pieces of environmental legislation. A list of all EPA licenced activities within the cumulative study area is included in Appendix 2-2.

The categories of EPA licenced activities considered as part of the cumulative assessment are as follows:

- Industrial Emissions (IE) Licensing;
- Integrated Pollution Control (IPC) Licensing;
- Waste Licensing; and
- Waste Water Discharge Authorisations.

2.7.3.3 Wind Farm Applications within 25km of the Proposed Turbines

A planning search was carried out to establish proposed, permitted and operational wind energy developments within 25km of the Proposed Wind Farm turbines. The search was carried out using the relevant local authority and ACP databases in January 2026 for relevant planning applications. In total, 19 no. applications relating to wind energy were identified within 25km of the proposed turbines, all of which relate to larger multiple turbine wind farm development. These are outlined in greater detail in Appendix 2-2.

In addition to this wind energy developments at pre-application stage or within the public domain (i.e public consultation commenced) are also considered and included in the cumulative wind farm list within 25km of Proposed Wind Farm turbines.

2.7.3.4 Summary

The cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider all potential significant cumulative effects arising from relevant projects and land uses within the cumulative study area. Existing land uses within the cumulative study area includes renewable energy, commercial forestry and agricultural pastural land. Furthermore, the cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider all potential significant cumulative effects arising from all land uses in the vicinity of the Proposed Project. These include permitted and existing wind farms in the area, solar farms, energy storage, ongoing agricultural practices/forestry practices, quarries and extractive industries, intensive production/ processing industries, large infrastructure projects and other EIAR projects.

Overall, the Proposed Project has been designed to avoid and mitigate impacts on the environment and a suite of mitigation measures is set out within the EIAR. The mitigation measures set out in this EIAR will ensure that significant cumulative effects do not arise during the construction, operational or decommissioning phases of the Proposed Project. Additional detail in relation to the potential significant cumulative effects arising and, where appropriate, the specific suite of relevant mitigation measures proposed are set out within each of the relevant chapters of this EIAR.