GARRANE GREEN ENERGY LIMITED

GARRANE GREEN ENERGY PROJECT

AT BALLYNAGOUL, CREGGANE AND GARRANE, CO. LIMERICK

PLANNING STATEMENT

AUGUST 2025

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GARRANE GREEN ENERGY PROJECT,

CO. LIMERICK

PLANNING STATEMENT

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1. INTRODUCTION AND BACKGROUND TO THE PLANNING APPLICATION

1.1 Introduction

Jennings O'Donovan & Partners Limited, Consulting Engineers, have prepared this Planning Statement ("the Statement") on behalf of Garrane Green Energy Ltd (The Applicant) to accompany the application ("the Application").

The purpose of this Planning Statement is to outline the background to the Project, the key elements of the proposal and to demonstrate that the proposed Project complies with all relevant planning policy and is in accordance with the proper planning and sustainable development of the area.

This statement provides a comprehensive assessment of the proposed Project's consistency with the relevant planning policy documents at European, national, regional and local levels.

1.2 Strategic Infrastructure Development

The Planning Application will be submitted directly to An Coimisiún Pleanála, previously An Bord Pleanála, (also referred to as "the Board" in relevant legislation, set out below) as a Strategic Infrastructure Application.

Strategic Infrastructure Development (SID) falls under the Planning and Development Acts 2000 (as amended by the Planning and Development (Strategic Infrastructure) Act 2006). Certain large scale private developments are listed in the 7th Schedule of the Planning and Development Acts.

The Act states, under 37A.that (1) An application for permission for any development specified in the Seventh Schedule (inserted by the Planning and Development (Strategic Infrastructure) Act 2006) shall, if the following condition is satisfied, be made to the Board under section 37E and not to a planning authority. That condition is that, following consultations under section 37B, the Board serves on the prospective applicant a notice in writing under that section stating that, in the opinion of the Board, the Project would, if carried out, fall within one or more of the following paragraphs, namely - (a) the development would be of strategic economic or social importance to the State or the region in which it would be situate (b) the development would contribute substantially to the fulfilment of any of the objectives in the National Spatial Strategy (now the National Planning framework) or in any regional planning guidelines (Now regional spatial strategies) in force in respect of the area or areas in which it would be situate or

(c) the development would have a significant effect on the area of more than one planning authority. Section 37 (b) states that a person who proposes to apply for permission for any development specified in the Seventh Schedule shall, before making the application, enter into consultations with the Board in relation to the Project. In any consultations, the Board may give advice regarding the proposed application and includes the procedures involved in making a planning application and in considering such an application, and what considerations, related to proper planning and sustainable development or the environment, may, in the opinion of the Board, have a bearing on its decision in relation to the application. Where following consultations, the Board considers that the proposal is a SID, they are required to serve a notice in writing.

A wind farm with more than 25 wind turbines or which has a total output of more than 50 megawatts, and meeting the criteria set out above is considered Strategic Infrastructure Development. This proposal of 9 No. turbines at 6MW each, producing a total of 54MW meets the criteria.

The Applicant undertook a Pre Application Consultation with An Bord Pleanála (now An Coimisiún Pleanála.

On 6 February 2025, An Bord Pleanála (now An Coimisiún Pleanála) advised that following consultations under section 37B of the Planning and Development Act, 2000 as amended, the Board was serving notice under section 37B(4)(a) that it is of the opinion that the proposed Project falls within the scope of paragraphs 37A(2)(a), 37A(b) and 37A(c) of the Act.

Accordingly, the Board decided that the proposed Project would be strategic infrastructure within the meaning of section 37A of the Planning and Development Act 2000, as amended. It was advised that any application for permission for the proposed Project must therefore be made directly to An Bord Pleanála under section 37E of the Act.

A list of prescribed bodies to be notified of the application for the proposed Project was provided and included, as follows:

- Minister for Housing, Local Government and Heritage (Development Applications Unit)
- Minister for the Environment, Climate and Communications
- Limerick City and County Council
- Cork County Council
- Southern Regional Assembly
- Transport Infrastructure Ireland

- An Chomhairle Ealaion
- The Heritage Council
- Fàilte Ireland
- An Taisce
- Inland Fisheries Ireland
- Waterways Ireland
- Office of Public Works
- Uisce Éireann (Irish Water)
- Health Service Executive
- Environmental Protection Agency
- Irish Aviation Authority
- ESB
- EirGrid
- Commission for Regulation of Utilities

2. STATEMENT OF AUTHORITY

This Planning Statement has been prepared by Vivienne Egan on behalf of Jennings O'Donovan & Partners Limited. Vivienne has a MSc in Planning from Queens University, Belfast, is a Member of the Irish Planning Institute and has over 30 years' experience in Planning throughout Ireland and the UK. She has a clear understanding of the legislative framework and has experience in the development of windfarms from the pre-planning process through to construction.

2.1 The Applicant

The Applicant – Garrane Green Energy Ltd, is a subsidiary of Greensource Sustainable Developments Limited (Greensource Ltd.).

Greensource is an innovative Irish renewable energy company based in Adare, Co. Limerick that specialises in the development of renewable energy projects, working with communities from pre-planning to operation, and creating long-lasting local partnerships. Greensource has over ten years development and operational experience. Greensource has a highly skilled and experienced team who are committed to developing projects with successful outcomes for all stakeholders. Working with integrity and care for the local environment, the team has a strong track record, having successfully completed wind energy and other renewable projects in the west of Ireland. As a locally based Irish company, Greensource have developed strong relationships by upholding the principles of

respectful interaction with landowners, communities and local authorities, maintaining a competitive advantage with other industry players. They currently employ a team of over 25 people across a range of development, financial and operational disciplines.

2.2 Site Location and Context

The Site is located approximately 2.5 kilometres (km) (closest turbine) north of Charleville Co. Cork, 22.9km south of Limerick City and 46.9km north of Cork City. The Site is located within the townlands of Ballynagoul, Creggane and Garrane. The proposed grid connection is located in the townland of Ballynagoul. The general area is comprised of agricultural pasture grazing farmland and the Site is located on relatively level ground, at elevations ranging from 58-61m above ordnance datum (AOD) in the northern side of the Site, to 63-73m AOD in the southern portion of the Site. The overall site extends to approximately 158.75 hectares (ha) (392acres) and is owned by private third-party landowners. A Site Location Map showing the Redline Boundary is set out below as **Figure 1.1** and all elements of the Project are provided as **Figure 1.2.**

The site itself is flat, located in lowland plains on the banks of the River Maigue and River Loobagh. The River Maigue is the closest river traversing centrally through the Site, 80m from the nearest turbine. Agricultural farmland is the dominant land use, used predominately for stock grazing, with a comprehensive system of hedgerow vegetation.

There are 166 receptors within 2km of the proposed turbines. A 'receptor' is a component of the natural or built environment (such as a human being, water, air, a building or a plant) that is potentially affected by an impact of construction works and/or the operation of a proposed Project. The receptors in this case includes 3 No. commercial properties, 6 No. derelict houses and 157 No. residential dwellings of which 5 No. are involved in the Project. The closest inhabited dwelling not involved in the Project is (H33) located 702m from the nearest turbine (T8). The closest dwelling involved in the Project is H28 located 529m from T3. All receptors located within 2km of the proposed turbines are shown on **Figure 1.3**. The nearest settlement is Charleville which is located approximately 2.5km (closest turbine) south of the Site.

The major transport corridor in the Overall Study Area is the N20 national road, located 300m to the west of the Site, which traverses the entire Area in a north-south direction. The N20 is intersected by a series of regional and local roads, and the railway. The R515 is located c. 2.4km south of the site; the R518 is located 2.8km north running east-west; the R578 diverts from Newtownshandrum c.7.8km southwest of the site; the R512 passes

through Kilmallock c.6.5km east of the site; and the Dublin to Cork InterCity railway runs in a broad northeast-southwest direction through the Area, coming within approx. 3km south-west of the Project, immediately southwest of Charleville. It is noted that the future M20 major road corridor is proposed within 2km west of the proposed site. A Wastewater treatment plant is located approximately 180m south of the nearest turbine.

Lough Gur is located c.15km north-east of the nearest turbine. Lough Gur is one of Ireland's foremost archaeological complexes and is popular for visitors, hosting a castle, visitors centre, cemetery, bird watch area, a series of ring forts as well as numerous other archaeological features. Adare Manor Golf Course and luxury resort is located in the wider north-west area, approximately 18km from the Site. Several other recreational features are also located within the Overall Study Area including the Kilmallock Cycle Hub, the largest cycling hub in Ireland. Route 3 of the cycling route comes within c.3km to the north-east of the Site and Route 1 of the cycle route comes within 4.3km to the south-east of the Site. Within 9km to the south-east of the Site is the nearest point of the Ballyhoura Way (National Waymarked Trail). Multiple walking and mountain bike trails are dispersed across the Ballyhoura Mountains which wind through existing operational wind turbines which have been developed. Other tourism, heritage and recreation features of local/ regional importance include: Kilmallock 13th century Dominican Abbey (c 6km east), Charleville Golf Course (c. 6km south-west); Bruree Mill (2.6km north-east); Effin GAA Club (c. 5.7km south-east) and Kilmallock GAA Club (c. 6km).

2.3 Planning History

There have been no previous planning applications on the site. Other than those for agricultural structures or dwellings, the only others of any significance in the general area, are as follows. None of these have any impact on the site.

Table 1.1: Planning History of the Site

Planning Application	Description	Applicant	Townland	Decision
911145	Retention of existing lagoons and permission to erect weir, flume, etc., and to raise existing levels of lagoon embankments	Golden Vale Plc.	Ballynagoul	Permission granted
92137	Relaying of effluent pipeline through Ballincolly from factory	Golden Vale Foods Products Ltd	Charleville	Permission granted
17270	the installation of an underground pumped outfall pipeline for the conveyance of treated waste water from our waste water treatment plant at Rathgoggan North, County Cork to a discharge point on the river located approximately 2km north of the waste water treatment plant site. The outfall pipeline installation, which is proposed as part of an upgrade of the existing waste water treatment plant at Rathgoggan North shall be routed across agricultural lands in the townlands of Creggane and Garrane in County Limerick to a discharge point on the River Maigue. The upgrade of the existing waste water treatment plant at Rathgoggan North including a section of the new outfall pipeline within the waste water treatment plant site shall be subject to approval of a separate application for planning permission to Cork County Council. The development works relate to an activity for which a revised Industrial Emissions Directive Licence is required	Kerry Ingredients (Ireland) Limited	Creggane & Garrane	Permission granted
19455	the construction of 114KWP photovoltaics solar farm system, underground cable, an inverter building and all associated site works. These works are being carried out within the curtilage of a Protected Structure	Cuan Mhuire Teoranta	Garrooe, Bruree House, Bruree.	Permission granted

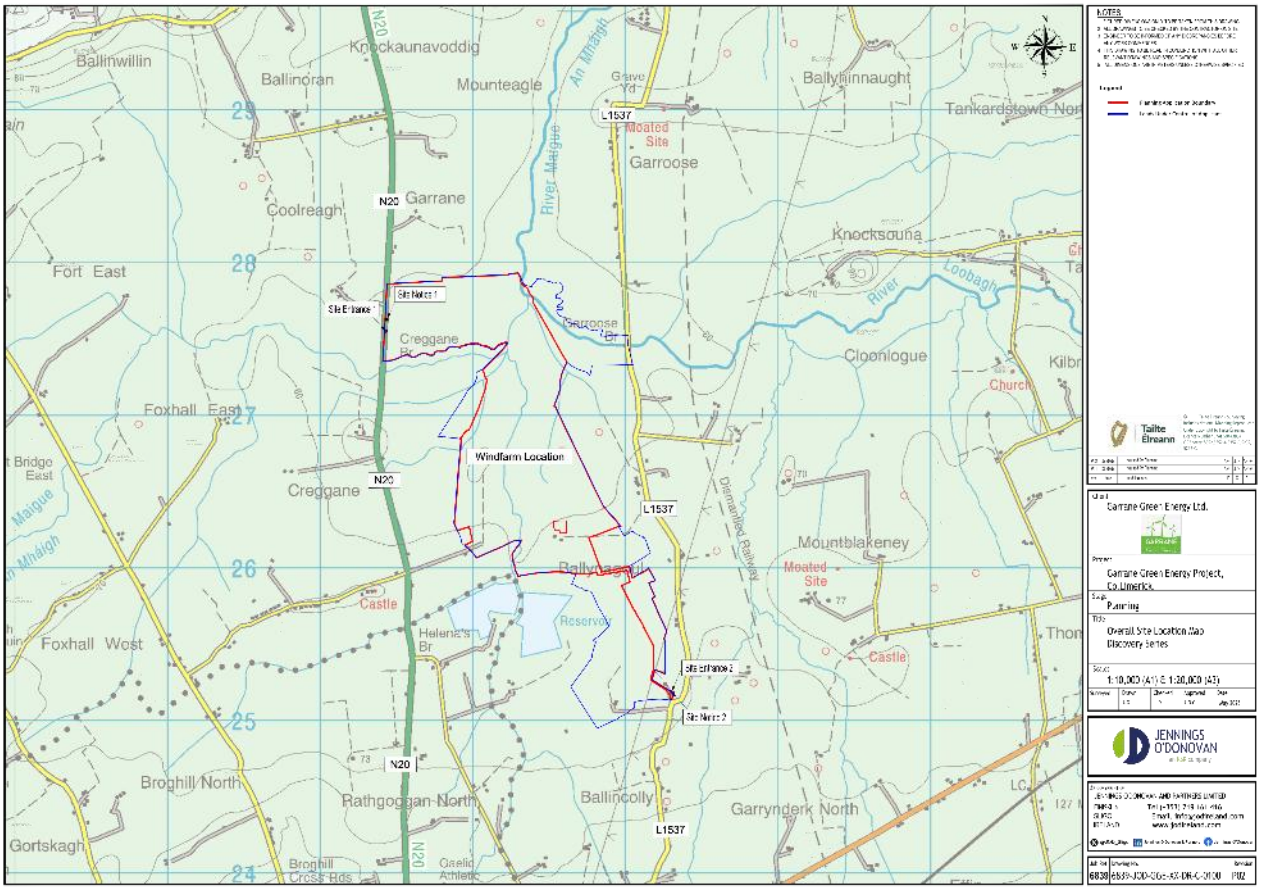


Figure 1.1: Site Location Map

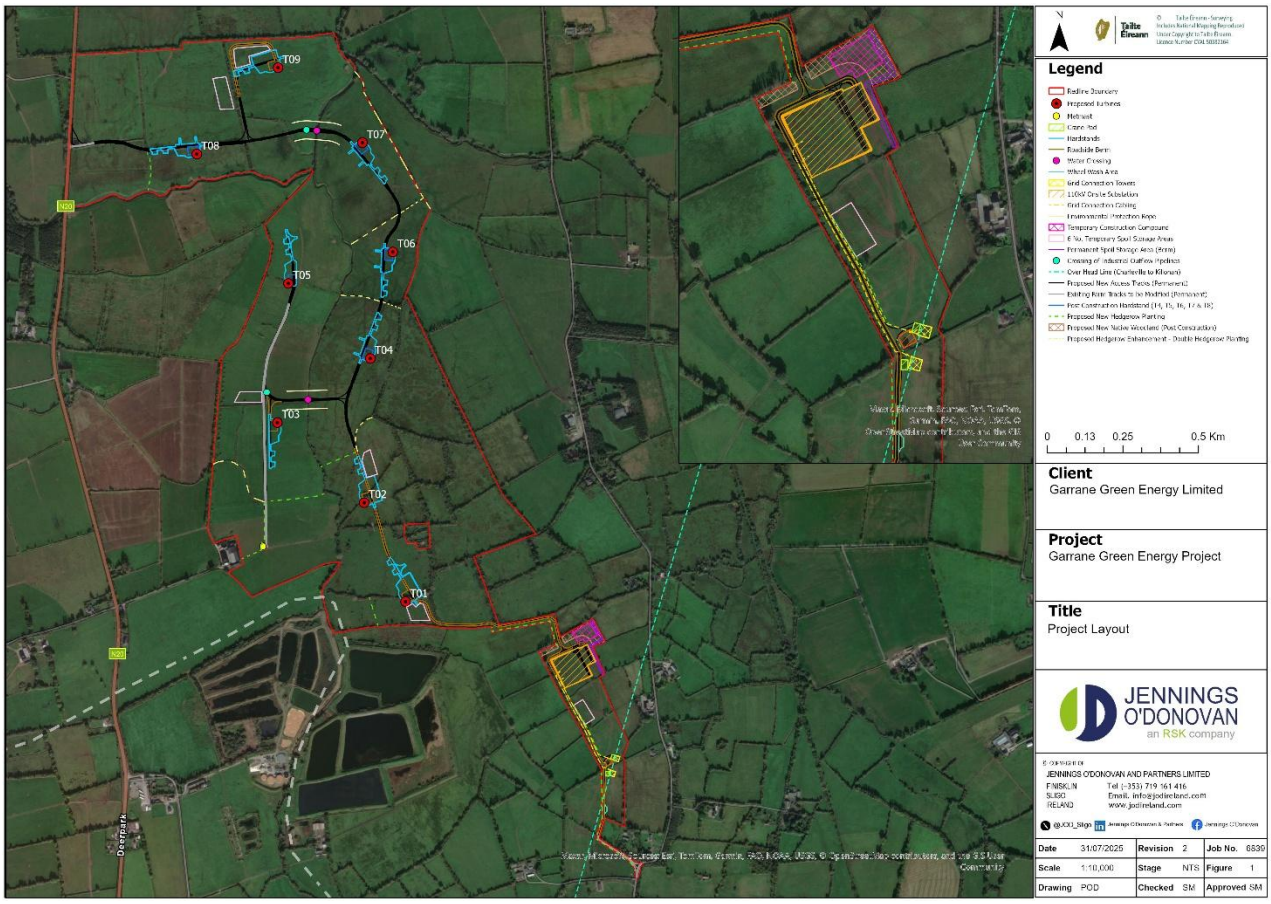


Figure 1.2: Project Layout

3. PROPOSED PROJECT

Permission is being sought for the following:

- Erection of 9 No. wind turbines with a tip height of 170m. The wind turbines will have a rotor diameter of 150m and a hub height of 95m.
- Upgrade of existing Access Tracks and construction of new permanent Access Tracks, permanent turbine hardstand areas and turbine foundations.
- Construction of two new bridge crossings on-site, one over the River Maigue and one over the Charleville Stream.
- Upgrade of existing site drainage network and installation of new site drainage.
- Wind Farm Internal Cabling connecting the wind turbines to the electrical substation.
- Construction of a permanent on-site AIS 110kV Substation, with a 'loop in' Grid Connection to the existing 110kV overhead line between Charleville and Killonan, including two single-storey control buildings with welfare facilities, all associated electrical plant and equipment, security fencing, gates, signage, all associated underground cabling, private well for water supply, wastewater holding tank, and all ancillary structures and works.
- Construction of a permanent double circuit 110kV underground cable and two steel cable interface masts to connect to the existing overhead line.
- Erection of a permanent 60m Meteorological Mast for monitoring wind speeds.
- Construction of a Temporary Construction Compound for use during construction.
- Upgrade of the existing entrance on the N20 (Site Entrance 1) (to be used for abnormal loads and turbine component delivery) and upgrade of an existing site entrance on the L1537 (Site Entrance 2) (to be used for all construction traffic except for abnormal loads and turbine component delivery).
- 6 No. temporary spoil storage areas and 1 No. permanent spoil storage area.
- Biodiversity enhancement and improvements associated with the Project.
- Landscaping, fencing and all associated ancillary works.

A 10-year planning permission and 35-year operational life from the date of commissioning of the entire wind farm is being sought. However, the onsite Substation and the Grid Connection will be handed over to ESB networks to own and operate. As part of the national grid infrastructure, permission is sought for the Grid Connection and the Substation in perpetuity.

The Site is located within the townlands of Ballynagoul, Creggane and Garrane and the proposed grid connection is located in the townland of Ballynagoul.

An EIAR and NIS have been submitted with the Application. The EIAR includes the works within the Redline Boundary as outlined above as well as the temporary accommodation requirements at 6 No. locations along the proposed Turbine Delivery Route (TDR) from Foynes Port located in the townlands of Corgrig, Court, Ballybrown, Skehacreggaun, Ballykeeffe, Rossbrien, Ballybronoge south, Attyflin and Garrane

An alternative TDR from the Port of Galway was also assessed for the delivery of turbine blades only which includes temporary accommodation requirements at 11 No. locations located in the townlands of Galway City, Carranduff, Rathmorrissy, Rossbrien, Ballybronoge South and Garrane.

Initial grid connection feasibility work has been completed for the Project and a 'loop in' grid connection to the existing 110 kilovolt (kV) Overhead Line (OHL) between the existing Charleville 110kV substation and Killonan 220kV substation was selected as the preferred option.

In summary the Project would:

- Contribute to the 65% overall renewable energy target for the EU introduced by the REPowerEU Plan in light of the war in Ukraine.
- Contribute to assisting Ireland to increase from 42% electricity produced by renewable sources in 2020 to 80% by 2030 to meet the national target.
- Contribute towards the National Development Plan 2021-2030's National Strategic Outcome number 13 to diversify away from fossil fuels to green energy which includes wind.
- Contributes towards climate change mitigation as specified in the National Planning Framework's National Policy Objective 69.
- Contribute toward renewable energy use and generation as specified in the National Planning Framework's National Policy Objective 70.
- Contribute 54MW, 1.15% of the current shortfall, of renewable wind energy to the national CAP2024 target of 9GW by 2030 helping to reduce the current 4.7GW shortfall.
- Comply with the Regional Spatial and Economic Strategy for the Southern region's goal of producing renewable energy to tackle climate change, meet predicted growth in demand and provide energy security.
- Support the local Limerick LDP 2022 - 2028 policy on promoting appropriate renewable energy development and assist the county in achieving its goal of being the national leader in renewable energy generation to facilitate a low carbon future.

- Contribute 54MW of renewable wind energy to the LDP 2022 – 2028 of 386.45MW by 2030, helping to reduce the current 152.1MW shortfall.
- Contribute to rural economic development in line with the Limerick County Development Plans and of the RSES.

4. STRATEGIC IMPORTANCE AND NATIONAL INTEREST

This section outlines the need for the Project and puts it in context of its strategic importance, based on International, National and Regional policy and guidance. It also set out the relevance of the project in the national interest, recognising the need for Ireland to implement legally binding national climate change targets by encouraging appropriate renewable energy development throughout Ireland. The Project will make a valuable contribution to climate change adaptation and greenhouse gas reductions as part of the International and European efforts to combat climate change.

Ireland is facing significant challenges in efforts to meet renewable energy and emissions targets and is falling behind in the longer-term movement away from fossil fuels. Ireland has one of the highest rates of importing fuel in Europe with imported dependency increasing to 81.6% in 2022 according to the SEAI[1]. Energy demand in Ireland has been growing and is expected to continue to increase, especially electricity demand which is expected to grow by 37% to 2031[2]. Increases to the cost of carbon, supply issues and potential political insecurity increases fossil fuel price volatility. Since the Russian invasion of Ukraine, energy prices in Ireland have increased significantly. The SEAI's Electricity Prices in Ireland Report; January to June 2022[3], found on average residential electricity prices increased 10.4% in the 12 months prior to June 2022. Concern over energy costs amongst the population of Ireland is high, a survey by the Journal in October 2022[4] found that 77% of people said that they already or intend to use their home heating less often. The Economic and Social Research Institute (ESRI)[5] report on Energy Poverty published in 2022, has also warned that as many as 43% of households could now be in energy poverty, defined as when more than 10% of the household's income is spent on electricity

[1] SEAI. (2023). ENERGY IN IRELAND. Available here Accessed 18/12/2024

[2] EirGrid. (2022). EirGrid's Generation Capacity Statement Predicts Challenging Outlook for Ireland https://www.eirgridgroup.com/newsroom/eirgrids-generation-capac/#:~:text=The%20GCS%2C%20in%20its%20median,relatively%20consistent%20across%20the%20decade. Accessed 18/12/2024

[3] SEAI. (2022). https://www.seai.ie/publications/SEAIs-EPR-data-for-JAN-to-JUN-2022.pdf Accessed 18/12/2024.

[4] The Journal. (2022). Cost of living crisis: Most households intend to use their home heating less often this winter https://www.thejournal.ie/poll-energy-use-ireland-heating-5891701-Oct2022/ Accessed 18/122024

[5] ESRI. (2022). Energy poverty at highest recorded rate https://www.esri.ie/news/energy-poverty-at-highest-recorded-rate Accessed 18/12/2024

and gas bills. Approximately 850MW of installed wind energy capacity is generated in Wind Farms in Ireland that will reach the end of their planning permissions or will have to be decommissioned between now and 2030. A recent report from Wind Energy Ireland[6] finds that between now and the end of 2030, Ireland may lose around a fifth of the total installed onshore wind energy capacity. This means that at a time when we should be accelerating towards our Climate Action Plan targets by increasing installed wind energy, we may end up in a position to fall backwards.

The high rate of imported fossil fuel dependency, the increasing demand for electricity, existing wind farms reaching the end of their operating life and current energy price volatility make it vital to introduce more domestic renewable energy generation, such as the Project to provide reliable, secure and affordable energy supplies in Ireland. The Project improves Irish energy security and will reduce reliance on imported fossil fuels in line with the National Energy Security Framework and the REPowerEU Plan.

4.1 The Climate Emergency

In April 2022, the Intergovernmental Panel on Climate Change (IPCC): made up of scientists from around the world, which provides regular assessments on the scientific basis of climate change, its impacts and future risks, released their AR6 report[7]. The report shows the widespread, dangerous disruptions caused by climate change in nature and shows how billions of people's lives are being impacted. It outlines how countries are falling behind on policies and actions needed to limit global temperature increases and achieve net zero emissions. Reducing carbon emissions by phasing out fossil fuels is stated as being urgently needed. Throughout the report, renewable energy such as wind is highlighted as an adaptation to displace fossils fuels and so reduce emissions and mitigate climate effects. Renewable energy is also credited with benefits such as improving air quality, reducing the cost of electricity, improving wealth and development and increasing energy security.

The Environmental Protection Agency[8] highlights that human activity has led to widespread and rapid changes in all components of the global climate system with recent extreme events in Ireland highlighting the vulnerability of individuals, communities, sectors and ecosystems to climate change and indicate an adaptation deficit.

[6] WEI. (2024) Repowering Ireland. https://windenergyireland.com/images/files/final-repowering-ireland-report-june-2024.pdf. Accessed 25/09/24

[7] IPCC. (2022) AR6. https://www.ipcc.ch/assessment-report/ar6/ Accessed 20/12/2024

[8] EPA (2024). Ireland's Climate Change Assessment Synthesis Report https://www.epa.ie/publications/monitoring--assessment/climate-change/irelands-climate-change-assessment-synthesis-report.php

On 29th November 2019 the European Parliament declared a climate emergency ahead of the UN COP 25 in Madrid in December 2019. In May 2019 the Oireachtas declared a "climate emergency" in an amendment to the report '*Climate Action: A cross-party consensus for action'* which followed the recommendations of the Citizens Assembly on Climate Action. There then followed the publication of the Cross-Departmental Climate Action Plan 2019 on 17th June 2019, this was revised in 2021, 2023 and 2024. The Climate Action Plan 2024 and 2025 reflects the accepted wisdom that decisive and urgent action is required to arrest the acceleration of greenhouse gas emissions within the limited window of opportunity that remains. The Plan includes a commitment to make Ireland 100% carbon neutral by 2050. It includes increased renewable electricity targets and reduction in reliance of fossil fuels and supporting the growth of private electric vehicles and meeting 80% of electricity demand, from renewable sources, all by 2030. Among the most important measures in the CAP 2024 and CAP 2025 was a target of 9GW from onshore wind, by 2030. In 2023, installed onshore wind capacity in Ireland reached 4.78GW[9]. This leaves a short fall of 4.2GW to be achieved in 7 years.

Therefore, in light of the climate emergency and legally binding targets related to emissions reductions there is a clear necessity, and it is of urgent national importance to increase the amount of energy from renewable sources, especially onshore wind, which is capable of being deployed in the near term. The Project is anticipated to have the capacity to generate between 54 MW towards these targets, helping to mitigate the effects of the climate emergency.

4.2 International Policy Context

International energy policy is based on the demand to address climate change and reduce carbon dioxide (CO_2) emissions and, therefore, renewable energy development is a core component of the solution.

4.2.1 United Nations Framework Convention on Climate Change

The United Nations Framework Convention on Climate Change (UNFCCC)[10] implemented by the United Nations in May 1992, determined a long-term objective to lessen greenhouse gases in the atmosphere, with the purpose of preventing anthropogenic interference with the climatic system. The UNFCCC recognises that the climate system is a shared resource whose stability can be affected by industrial and other emissions of carbon dioxide and

[9] Statista (2023). Onshore wind energy capacity in Ireland 2008-2023. Available here Accessed 18/12/2024.
[10] The United Nations Framework Convention on Climate Change (UNFCCC) (1992). http://unfccc.int/resource/docs/convkp/conveng.pdf Accessed 18/12/2024

other greenhouse gases. The convention enjoys near universal membership, with 197 countries listed as being Parties to the Convention.

The Project, by producing renewable energy, which will displace heavily polluting fossil fuels, is in line with the UNFCCC in relation to emissions reductions.

4.2.2 The Kyoto Protocol

The Kyoto Protocol came into effect in 2005, as a result of which, emissions reduction targets agreed by developed countries, including Ireland, are now binding. Under the Kyoto Protocol, the EU agreed to achieve a significant reduction in total greenhouse gas emissions of 8% below 1990 levels in the period 2008 to 2012. Ireland's contribution to the EU commitment for the period 2008 – 2012 was to limit its greenhouse gas emissions to no more than 13% above 1990 levels.

In Doha, Qatar, on 8 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 1 January 2013 to 31 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.

The Project, by producing renewable energy, which will displace heavily polluting fossil fuels, is in line with the Kyoto Protocol and the Doha Amendment in relation to emissions reductions.

4.2.3 The Paris Agreement

The Paris Agreement is a legally binding international treaty on climate change. It was adopted by 196 Parties at COP 21 in Paris, on 12 December 2015 and entered into force on 4 November 2016. It seeks to accelerate and intensify the actions and investment

needed for a sustainable low carbon future. Its central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. The Agreement also aims to strengthen the ability of countries to deal with the impacts of climate change. Ireland is bound by Article 7 of the United Nations COP21 Paris Agreement, to prepare and submit periodic updates on its national adaptation and mitigation plans in the global effort to keep global warming below 1.5°C (Nationally Determined Contributions). Ireland is required to reduce greenhouse gas emissions by at least 40% by 2030 when compared with levels in 1990. The Project will contribute to Ireland meeting these targets by displacing reliance on fossil fuels.

Out of 196 Parties that have ratified the Paris Agreement, 90% mentioned renewables and roughly 70% included quantifiable energy targets in their initial Nationally Determined Contributions. However, a report by the International Energy Agency (IEA)[11] cautions that renewables growth will still need to double to reach the Paris Agreement goal of achieving net-zero emissions by 2050. The International Renewable Energy Agency (IRENA), in a report[12] on the Nationally Determined Contributions relating to renewable energy also note that even with the renewable energy pledges in the 2021 Paris agreement, the 1.5ºC goal will still be exceeded before the end of the century. IRENA cautions that renewables growth will still need to double to reach the Paris Agreement goal of achieving net-zero emissions by 2050.

The United Nation's (UN) 26th global climate summit, held in 2021 in Glasgow, set out nations' commitments to a range of decisions in a collective effort to limit global temperatures to 1.5 degrees. The 27th Global climate summit, the COP27 UN Climate Change Conference, was held in 2022 in Egypt. At this summit, agreement was reached on financing loss and damage from the impacts of climate change. At COP28 in Dubai (Nov. 2023), it was expected that the wording of the agreement would include a stronger message on "transitioning away from fossil fuels". Although the wording of the agreement did not signify an imminent "transitioning away from fossil fuels", the agreement signals the "beginning of the end" of the fossil fuel era by laying the ground for a swift, just and equitable transition. This agreement highlights the importance of alternative, renewable energy generation projects to facilitate this transition.

[11] IEA. (2021) Renewables 2021 https://www.iea.org/reports/renewables-2021 Accessed 18/12/2024

[12] IRENA. (2021) https://www.irena.org/-/media/Files/IRENA/Agency/Publication/2022/Jan/IRENA_NDCs_RE_Targets_2022.pdf Accessed 18/12/2024

COP28 was particularly momentous as it marked the conclusion of the first 'global stocktake of the world's efforts to address climate change under the Paris Agreement. Having shown that progress was too slow across all areas of climate action – from reducing greenhouse gas emissions, to strengthening resilience to a changing climate, to getting the financial and technological support to vulnerable nations – countries responded with a decision on how to accelerate action across all areas by 2030. This includes a call on governments to speed up the transition away from fossil fuels to renewables such as wind and solar power in their next round of climate commitments.

At COP29 in Baku (Dec. 2024), several pivotal agreements were reached. A new climate finance goal was set to mobilize $300 billion annually by 2035, with efforts to raise $1.3 trillion per year from public and private sources. An agreement on carbon markets was established, creating pathways for sustainable business actions. Additionally, a new loss and damage fund was operationalised, with $800 million pledged to aid adaptation efforts. Enhanced measures for transparent climate reporting were also agreed upon to ensure accountability and progress tracking. These agreements aim to accelerate global climate action and support vulnerable nations in adapting to climate impacts.

Ireland is one of the 196 parties to the Paris agreement. Europe's planned emission reductions in line with the Paris Agreement are set out in part under the Effort Sharing Regulation (2023/857). Under this regulation, Ireland is obliged to reduce GHG emissions by 42% in relation to 2005 levels. This figure was revised upwards under Article 4 of Regulation 2021/1119 by the EU in April 2021 to a 55% domestic Green House Gas reduction by 2030 compared to 1990.

The above highlights the importance of alternative, renewable energy generation projects, such as this Project. By producing renewable energy, which will displace heavily polluting fossil fuels, the proposal is in line with the Paris Agreement in relation to emissions reductions to keep global warming below 1.5°C.

4.3 European Policy Context

The European Union's (EU) energy policy is based on the principles of decarbonisation, competitiveness, security of supply and sustainability. Its objectives include ensuring the functioning of the energy market and a secure energy supply within the EU, as well as promoting energy efficiency and savings, the development of renewable energies and the interconnection of energy networks[13]. The EU aims to be climate neutral by 2050. To do

[13] European Parliament. Energy policy: general principles. https://www.europarl.europa.eu/factsheets/en/sheet/68/energy-policy-general-principles. Accessed 20/12/2024.

this, it will carry out a series of initiatives that will protect the environment and boost the green economy[14].

The European Union's (EU) energy policies are set out and powered by three main objectives:

- To ensure energy providers operate in a competitive environment, ensuring affordable prices for homes and businesses.
- To secure energy supplies and to ensure reliable energy delivery whenever and wherever it is needed; and
- To have sustainable energy consumption, through lowering dependence on fossil fuels and decreasing greenhouse gas emissions and pollution.

The importance of delivering on these key objectives have been underlined by the Commission's robust and ambitious response to the ongoing conflict in Ukraine – and has seen a suite of legislative files introduced in the sustainability and environmental sectors in its current mandate.

In line with this broad outline of European Policy, the Project by producing additional renewable energy to the Irish electric system, contributes to secure energy supplies. The generation of renewable energy also helps to lower Irelands dependency on fossil fuels.

4.3.1 Renewable Energy Directive

In order to make the EU a global leader in renewable energy and ensure that the target of the final energy consumption for is achieved, the EU passed the Renewable Energy Directive (RED I) 2009/28/EC and revised it in 2018 and 2023. The amendment of the Renewable Energy Directive, which is referred to as "RED III" obliges Member States to collectively ensure the share of renewable energy in the European Union's gross final energy consumption is at least 42.5% by 2030, with an additional 2.5% indicative top-up to allow the target of 45% to be achieved.

RED III also places the presumption of overriding public interest for renewable energy projects (Imperative Reasons for Overriding Public Interest - IROPI) on a permanent footing. Article 16f of the Directive states that Member States must ensure that in the permit-granting procedure, the planning, construction and operation of renewable energy plants, their connection to the grid, the grid itself and storage assets are presumed to be IROPI.

[14]European Commission. https://climate.ec.europa.eu/eu-action/climate-strategies-targets/2050-long-term-strategy_en Accessed 20/12/2024

Most notably, RED III obliges Member States to speed up and simplify renewable infrastructure permitting procedures by ensuring that procedures for granting permits to build, repower and operate energy assets do not exceed certain timelines, depending on the asset type, size and location. We expect that this will accordingly speed up development and transaction timelines. Furthermore, Article 16b(1) provides that the permit-granting procedure for onshore renewable energy projects outside renewables acceleration areas must not exceed two years.

The transposition deadline for these provisions was 1 July 2024. An infringement notice has been served on Ireland in respect of its failure to meet this deadline.

A Renewable Deployment Acceleration Programme was introduced in Dec 2022 in recognition of the worsening energy crises arising from Russia's war against Ukraine.

It should be noted that the Project, subject of this Planning Application does not rely on Imperative Reasons of Overriding Public Interest (IROPI), as the accompanying Natura Impact Statement (NIS) has concluded, beyond reasonable scientific doubt, that the Project will not adversely affect the integrity of any European site, in view of the relevant conservation objectives. Nonetheless, the inclusion of these provisions serves to further demonstrate the essential role of renewable energy infrastructure in contributing to the European Union's legally binding target of achieving net-zero greenhouse gas emissions by 2050. This is set out in further detail below.

4.3.2 REPowerEU plan

In May 2022, the commission published The REPowerEU Plan[15] which puts forwards a set of actions to:

- Save energy;
- Diversify supplies;
- Quickly substitute fossil fuels by accelerating Europe's clean energy transition;
- Smartly combine investments and reforms.

It notes that:

"*Slow and complex permitting processes are a key obstacle to unleashing the renewables revolution and for the competitiveness of the renewable energy industry*"

[15]European Commission. (2022) https://eur-lex.europa.eu/resource.html?uri=cellar:fc930f14-d7ae-11ec-a95f-01aa75ed71a1.0001.02/DOC_1&format=PDF Accessed 18/12/2024

The REPowerEU plan also states: *"Lengthy administrative procedures are one of the key barriers for investments in renewables and their related infrastructure. These barriers include the complexity of the applicable rules for site selection and administrative authorisations for projects, the complexity and duration of the assessment of the environmental impacts of the projects, grid connection issues, constraints on adapting technology specifications during the permit-granting procedure, or staffing issues of the permit-granting authorities or grid operators. In order to accelerate the pace of deployment of renewable energy projects it is necessary to adopt rules which would simplify and shorten permit-granting processes."*

In 2021 the EU reached a 22.8%[16] share of its gross final energy consumption from renewable sources which leaves a long way to go to reach this increased target.

In accordance with the REPowerEU Communication in May 2022, the Commission published a recommendation[17] on speeding up permit-granting procedures for renewable energy projects, accompanied by guidance to help the Member States speed up permitting for renewable energy plants.

The recommendation was created in order to help Member States exploit all possibilities for acceleration that exist within the legislative framework. It proposes measures to streamline procedures at national level, addresses ambiguities in the application of EU legislation and sets out good practices in Member States. It recommends participatory approaches that involve local and regional authorities and providing authorities with the necessary resources so as to facilitate the timely realisation of locally adapted investments.

Recommendations include:
"*Member States should ensure that the planning, construction and operation of plants for the production of energy from renewable sources, their connection to the electricity, gas and heat grid and the related grid itself and storage assets* ***qualify for the most favourable procedure available in their planning and permit-granting procedures*** *and are* ***presumed as being in the overriding public interest*** *and in the* ***interest of public safety****, in view of the legislative proposal amending and strengthening the provisions of Directive (EU) 2018/2001 related to administrative procedures and without prejudice to the Union law."*

[16] European Commission. (2023). https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Renewable_energy_statistics#Share_of_renewable_energy_more_than_doubled_between_2004_and_2020 Accessed 20/12/2024
[17] EU. https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=PI_COM:C(2022)3219&from=EN Accessed 20/12/2024

"Member States should establish clearly defined, accelerated and as short as possible deadlines for all the steps required for the granting of permits to build and operate renewable energy projects, specifying the instances where such deadlines may be extended and under which circumstances. Member States should establish binding maximum deadlines for all relevant stages of the environmental impact assessment procedure."

The Project, by producing renewable energy, supports the REPowerEU Plan, helping the EU to secure energy supplies, reach the increased renewable energy target and assisting in the clean energy transition.

As a Member State, Ireland has introduced significant measures under the Planning and Development Act 2024 to accelerate the granting of permits for the construction and operation of renewable energy projects. The Act affirms that where a plan or development relates to, or facilitates: (a) the construction or operation of a renewable energy plant; (b) the storage of renewable energy; or (c) the connection of renewable energy to the electricity, gas, or heat networks, such development shall be deemed necessary for IROPI, in line with the requirements of RED III. The legislation establishes a clearer distinction between categories of consent and, critically, introduces statutory timeframes for decision-making across all consent processes—including, for the first time, those handled by An Coimisiún Pleanála. These measures are intended to bring greater clarity and predictability to the planning process, benefiting both the public and stakeholders involved in the delivery of key infrastructure such as renewable energy and housing. Under the new framework, decision timelines for An Coimisiún Pleanála, when enacted, will range from 18 weeks for appeals concerning smaller-scale developments to 48 weeks for Strategic Infrastructure Developments.

The Project is compliant with EU policy and legislation as it contributes towards the goal of decarbonising the energy sector in the EU and increasing the supply of renewable energy sources. The Project in Garrane, County Limerick will have an installed capacity of 54 MW of renewable energy which would contribute towards the RED targets for 2030 and help to prevent further requirements to acquire statistical transfers from other Member States.

4.3.3 European Green Deal and European Climate Law

The European Green Deal (presented in 2019) is a package of policy initiatives, which aims to set the EU on the path to a green transition, with the ultimate goal of reaching climate neutrality by 2050. It supports the transformation of the EU into a fair and prosperous

society with a modern and competitive economy. The European Green Deal will transform the EU into a modern, resource-efficient and competitive economy, ensuring:

- no net emissions of greenhouse gases by 2050
- economic growth decoupled from resource use
- no person and no place left behind

It focuses on 3 key principles for the clean energy transition, which will help reduce greenhouse gas emissions and enhance the quality of life of our citizens:

- Ensuring a secure and affordable EU energy supply.
- Developing a fully integrated, interconnected and digitalised EU energy market.
- Prioritising energy efficiency, improving the energy performance of our buildings and developing a power sector based largely on renewable sources.

The European Climate Law writes into law the goal set out in the European Green Deal for Europe's economy and society to become climate-neutral by 2050[18]. The law also sets the intermediate target of reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels.

The Project, by producing renewable energy, is in line with the European Green Deal and European Climate Law, helping the EU to reach the goal of no net emissions by 2050.

Clean Industrial Deal 2025

This is an umbrella strategy setting out concrete actions to turn decarbonisation into a driver of growth for European industries. This includes lowering energy prices, creating quality jobs and the right conditions for companies to thrive. The Deal presents measures to boost every stage of production, with a focus on:

- energy-intensive industries such as steel, metals, and chemicals, that urgently need support to decarbonise, switch to clean energy, and tackle high costs, unfair global competition, and complex regulations
- the clean-tech sector which is at the heart of future competitiveness and necessary for industrial transformation, circularity, and decarbonisation.

The main elements of the deal are:

- Affordable energy
- Boosting demand for clean products

[18] European Commission. European Climate Law. https://climate.ec.europa.eu/eu-action/european-climate-law_en. Accessed 06/11/2024.

- Financing the clean transition
- Circularity and access to material
- Acting on global scale
- Skills and quality jobs

4.4 National Policy Context

The EU Governance of the Energy Union and Climate Action Regulation 2018/1999 as amended requires Member States to develop integrated National Energy and Climate Plans (NECP) to cover:

1. Security, Solidarity and Trust – Working closely with Member States to diversify Europe's sources of energy and ensure energy security.
2. A fully-integrated internal energy market – Energy should flow freely across the EU, without technical or regulatory barriers. This would enable energy providers to compete freely and promote renewable energy while providing the best energy prices.
3. Energy Efficiency – Improving energy efficiency to reduce the EU's dependence on energy imports, cut emissions and drive jobs and growth.
4. Decarbonisation – Putting in place policies and legislation to cut emissions, moving towards a low-carbon economy and fulfilling the EU's commitments to the Paris Agreement on climate change.
5. Research, Innovation and Competitiveness – Supporting research and innovation in low-carbon and clean energy technologies which can boost the EU's competitiveness.

4.4.1 Climate Act

The Climate Action and Low Carbon Development Act 2015, as amended by the Climate Action and Low Carbon Development (Amendment) Act 2021 commits Ireland to reach a legally binding target of net-zero greenhouse gas emissions no later than 2050, and a cut of 51% by 2030 (compared to 2018 levels).

It establishes a framework with clear, legally binding targets and commitments, and ensures the necessary structures and processes are embedded on a statutory basis to achieve our national, EU and international climate goals and obligations in the near and long term.

When exercising its decision-making powers under the Planning Act, planning authorities and An Coimisiún Pleanála are obliged under s. 15 of the Climate Act to:

"*in so far as practicable, perform its functions in a manner consistent with—*

(a) the most recent approved climate action plan,

(b) the most recent approved national long term climate action strategy,

(c) the most recent approved national adaptation framework and approved sectoral adaptation plans,

(d) the furtherance of the national climate objective, and

(e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State."

The above requirement is a mandatory obligation.

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

The recent judgement of the High Court delivered on 10th January 2025 provides clarity on the obligations imposed on public bodies under section 15 of the Climate Act (Coolglass Wind Farm Limited v An Bord Pleanála [2025] IEHC 1). Mr Justice Humphreys undertook a detailed consideration of the interpretation of section 15 of the Climate Act and concluded that, when deciding upon an application relevant to the achievement of climate plans and objectives under S.15 of the Act, relevant bodies, in this case the Commission, is required to:

1. Consider which option available to it as the decision maker, grant or refuse permission, would contribute to achieving Ireland's climate targets and the wider objectives of section 15 – which Mr Justice Humphreys went on to conclude "*in the case of renewable energy projects, the answer to that will almost always be a grant of permission*".

2. Consider whether granting permission is *"precluded by a mandatory and non-flexible legal requirement"* that does not grant the decision maker any discretion or evaluative judgment in reaching an outcome favouring climate goals, i.e. a grant of permission.

3. If the decision maker is not precluded from granting permission, then how can the planning authority use its evaluative judgement and discretion to reach an outcome favouring these policy goals.

The Project, if granted, would clearly contribute to climate targets.

There are no mandatory and non-flexible legal requirements that prevent the Commission from reaching an outcome, in relation to the Project, that favours policy goals, i.e. granting permission. The Project is supported by local, regional and national policy and will be

constructed and operated in accordance with national guidance and best practice. It has also been demonstrated, in the EIAR and NIS, that the Project will not give rise to any significant effect on the environment or have an adverse effect on the integrity of European Sites.

With these matters considered, it is respectfully submitted that the Commission is obliged to exercise their evaluative judgement to reach an outcome favouring policy goals, in accordance with their obligation under section 15 of the Climate Act and grant permission.

On the 20th May 2025, the Supreme Court granted leave to appeal to the Commission to appeal the High Court's decision in the Coolglass case.

The Act includes the following key elements:

- Places on a statutory basis a 'national climate objective', which commits Ireland to pursue and achieve no later than 2050, the transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy.
- Embeds the process of carbon budgeting into law, Government are required to adopt a series of economy-wide five-year carbon budgets, including sectoral targets for each relevant sector, on a rolling 15-year basis, starting in 2021.
- Actions for each sector will be detailed in the Climate Action Plan, updated annually.
- A National Long Term Climate Action Strategy will be prepared every five years.

The Project is anticipated to have the capacity to generate 54MW and will contribute towards Ireland's legally binding targets in the Climate Action and Low Carbon Development Act to reduce greenhouse gas emissions 51% by 2030.

4.4.2 The Climate Action Plan 2024

The Climate Action Plan 2024[19] (CAP2024) sets out Ireland's ongoing, urgent response to the climate crisis and outlines actions to cut emissions in the electricity sector by 75% based on 2018 levels by 2030 and achieve net zero by 2050. It outlines a massive scaling up in the switch to renewable energy. The critical nature of the climate change challenge is identified in the plan as are the extensive direct and indirect threats of harm to Ireland and its people. Reducing GHGs to mitigate climate change is a key point, reiterated throughout the plan. It states that Ireland's greenhouse gas (GHG) emissions are estimated to have

[19]Government of Ireland. (2024). Climate Action Plan 2024 https://www.gov.ie/en/publication/79659-climate-action-plan-2024/ accessed 20/12/2024

fallen by 1.9% in 2022 compared to 2021 but that this reduction falls short of the level of abatement required to meet national and international targets.

In the plan, the goal in the electricity sector is to make Ireland less dependent on imported fossil fuels and the plan highlights the need to remove barriers to the development of renewables, including onshore wind. The plan notes that the war in Ukraine has had a significant impact on the cost and security of our energy supply. This underlines the importance of Ireland eliminating dependency on fossil fuels and that an increase in renewable energy generation, along with supporting flexibility and demand management measures, is necessary for our future energy security. To achieve this, energy needs to be decarbonised by harnessing renewable resources, particularly wind, solar PV and biomass.

The targets set out in the CAP2024 envisages a step-up of our existing targets to meet the required level of emissions reduction by 2030, including:

- Increase electricity generated from renewable sources to 80%
- Complete the phase-out of coal and peat-fired electricity generation
- 75% reduction in overall green-house gas emissions in the electricity sector compared to 2018 levels
- Increase onshore wind to 9GW

The driving force behind this aim is the intention to facilitate a large-scale deployment of renewables that will be critical to decarbonising the power sector as well as enabling the electrification of other technologies. The plan notes that the transition away from fossil fuels and towards locally generated renewables will improve energy security and reduce Ireland's dependence on imported energy.

The CAP 2024 notes that increased renewable electricity generation will play an important role in the decarbonisation of other sectors through electrification, including transport, heating, and industry. It underlines that the transition away from fossil fuels and towards locally generated renewables will improve energy security and Irelands dependence on imported energy. The plan has measures to accelerate renewable electricity generation, this includes: *"Ensure that renewable energy generation projects and associated infrastructure are considered to be in the overriding public interest".*

These measures are in line with the REPowerEU plan and highlight the urgent need for additional renewable energy developments to reduce the reliance on fossil fuels, especially in light of the war in Ukraine and climate crisis.

One of the 'Key Metrics to Deliver Abatement in Electricity' is to accelerate flexibility. This includes the 2025 KPIs of;

- Maximum level of renewables at any one time on the grid: 85%
- Dispatch down (excluding surplus generation) of renewables below 7%.
- Minimise surplus generation
- Required long term storage (4 hour plus) in place.

The Project contributes to achieving these KPIs.

The plan notes that the deployment of renewables needs to outpace the growth in energy demand for it to deliver the absolute reductions in GHG emissions required. The demand for electricity in Ireland is predicted to grow by 19-50% in the next decade. Renewables accounted for 38.9% of electricity generated in 2022[20], this needs to increase to 80% by 2030 to achieve the national target.

Therefore, there is a clear necessity of urgent national importance to increase the amount of energy from renewable sources.

Section 12.3 outlines the projections for the energy sector. The CAP 2024 clearly outlines the need to accelerate the deployment of renewable energy:
"Given that the programme of large-scale offshore wind deployment is expected to be realised towards the end of the decade, deployment rates for onshore renewables will need to increase to match demand growth to ensure we keep electricity emissions within range of the carbon budgets. This requires a major upscaling and accelerating in current deployment of renewables, particularly onshore wind.

As an example, the historical average deployment of onshore wind installed capacity connected between 2008 and 2020 inclusive was ~280 MW per annum from 19 projects (with an annual maximum of 612 MW). To achieve the necessary emissions abatement, an approximately eight-times increase of renewable energy deployment to 2.3 GW annually would be needed between 2024 and 2030".

Among the most important measures in the plan is a target of 9GW from onshore wind by 2030. In Dec 2023 Ireland's total onshore wind generation capacity was 4.8GW[21], leaving

[20] SEAI. (2023). Energy in Ireland 2023. https://www.seai.ie/data-and-insights/seai-statistics/key-publications/energy-in-ireland/?gad_source=1&gclid=EAIaIQobChMIw_qE4JrnhQMVx5BQBh1W9wZdEAAYASAAEgIt8fD_BwE
[21] Statista. (2024). Onshore wind energy capacity in Ireland 2008-2023 https://www.statista.com/statistics/868474/onshore-wind-energy-capacity-in-ireland/

a shortfall of 4.2GW to be achieved in 7 years. The Project is anticipated to have the capacity to generate 54MW of renewable wind energy to contribute to these targets and reduce the shortfall.

CAP 2024 highlights the national obligation to increase the deployment of renewables including onshore wind to meet our legally binding sectoral emissions targets. In this regard, it makes abundantly clear that the rate of required renewable deployment is unparalleled and must be circa eight times faster in the period 2024 - 2030 than the historical average. In the EIAR submitted with this Planning Statement, the Alternatives to the Project are assessed in Chapter 3. This includes the Do-Nothing scenario in which the Project's contribution to EU and National renewable energy and greenhouse gas reduction targets would be lost, which in light of the climate emergency and energy security concerns is not a reasonable alternative to the deployment of renewable energy.

The plan identifies that increasing renewable energy will directly reduce emissions but also help with the electrification of other sectors stating:
"The electricity sector continues to face an immense challenge in meeting its requirements under the sectoral emissions ceiling, as the decarbonisation of other sectors, including transport, heating, and industry, relies to a significant degree on electrification. The deployment rates of renewable energy and grid infrastructure required to meet the carbon budget programme for electricity is unprecedented and requires urgent action across all actors to align with the national targets".

The Project will help to meet this increased demand and achieve these additional emissions savings. The plan notes that the transition away from fossil fuels and towards locally generated renewables will improve energy security and Ireland's dependence on imported energy. Section 12.1.3 of the CAP2024 sets out the scale of the challenge for the electricity sector:
"At a time when the energy system is under severe pressure to ensure security of supply, amid projections of rapid electricity demand growth over the coming decade, the electricity sector has been set one of the smallest carbon budget allocations and the steepest trajectory (-75%) across all sectors. The scale of the challenge to meet the sectoral emissions ceiling is immense and requires policies to be moved from an 'end of decade' target trajectory towards a 'remaining carbon budget' target".

Further measures include policies to increase energy storage to provide for smoothing of electricity supply and demand between times of high variable renewable production and low variable renewable production. As part of the measures to accelerate flexibility in the

electricity section, the CAP2024 includes developing a policy framework for electricity storage based on electricity system needs.

The Climate Action Charter for Local Authorities is a key action in the Climate Action Plan, it commits local authorities to actions that will ensure that they play a key leadership role locally and nationally in delivering effective climate action. These actions include that in so far as is practicable local authorities will put in place practicable measures which reduce our carbon emissions in line with national objectives. It includes a commitment to ensure policies and practices at local government level lead the county towards low carbon pathways and put in place a process for carbon proofing major decisions, programmes and projects on a systematic basis, including investments in transport and energy infrastructure moving over time to a near zero carbon investment strategy.

The Project is anticipated to have the capacity to generate between 54 MW and supports the target of doubling of onshore wind energy generation in Ireland by 2030 and contributes to the nation's target increase of renewable electricity from 30% to 80% by 2030 as set out in the Climate Action Plan 2024. The Project will contribute 54MW of renewable electricity or power for up to 37,000 homes. This represents c.1.2% of new onshore wind energy to reach the target of 9GW in CAP24. It also represents c.36% of the new Wind Target Capacity in the Limerick Development Plan 2022 – 2028 (LDP) of 152.1MW by 2030.

4.4.3 The Climate Action Plan 2025

The Climate Action Plan 2025[22] (CAP2025) was published in April 2025 and is the latest assessment and measurement of what has been achieved over the past year, building on actions taken in 2024. It sets out what need to be done in 2025 so Ireland is prepared to take on the challenges of our second carbon budget period 2026-2030.

Irelands Progress to date:

- in 2023 emissions reduced by nearly 7%
- emissions in the first half of 2024 were down over 17%
- compared with the same period in 2023, emissions in the first half of 2024 reduced by 3.5%
- Irish wind farms generated nearly 40% of Ireland's total electricity demand in the first half of 2024
- over the past year, emissions in agriculture have reduced by over 4%

[22]Government of Ireland. (2025). Climate Action Plan 2025 https://assets.gov.ie/static/documents/Climate_Action_Plan_2025_updated_cover.pdf [Accessed 22/04/2025]

- in the built environment, emissions have decreased by 21% since 2018
- in transport, emissions increased by 0.3% in 2023

CAP25 re-affirms the previous commitment to increasing the share of renewable electricity to 50% by 2025 and 80% by 2030. Overall, the share of renewable electricity generation in Ireland increased from 38.6% to 40.7% from 2022 to 2023. The figure for 2024 will likely be between 40% and the interim, end of year target of 50% set out in CAP25.

The targets are:

- onshore wind, 2GWs by 2025 and 9 GWs by 2030
- offshore wind, at least 8GWs by 2030
- solar, up to 5GW by 2025 and 8GW by 2030

These targets are unchanged for the previous two years. CAP25 states:
"A renewables-led system is at the core of Ireland's plan to radically reduce emissions in the electricity sector, protect our energy security, and ensure our economic competitiveness. This requires the accelerated and increased deployment of new renewable electricity generation capacity and related infrastructure."

4.4.4 The National Planning Framework - First Revision

The National Planning Framework (NPF) is the overarching policy and planning strategy for the social, economic and cultural development of Ireland. The framework aims to promote a more environmentally focused planning system at a local level. The first revision was approved by the Oireachtas on 30 April 2025. This revision, which anticipates a population projection of between 6.1 and 6.3 million by 2040, builds upon the original 2018 NPF, reflects changes in Ireland and updates the planning framework for balanced regional development and sustainable growth. The revised NPF, along with the National Development Plan 2021, forms the overall planning and investment framework for Ireland's social, economic, and cultural development. The framework is revised and updated to take account of changes that have occurred since it was published in 2018 and to build on the framework that is in place. It is a framework to guide public and private investment, to create and promote opportunities, and to protect and enhance the environment.

The first revision to the National Planning Framework (NPF) significantly strengthens the focus on renewable energy, particularly by incorporating regional renewable electricity capacity allocations. This revision has also introduced a clearer focus on climate transition and includes more explicit references to renewable energy.

The First Revision puts an increased emphasis on the importance of renewable energy development and the infrastructure needed to support this. Chapter 9 acknowledges that the "accelerated delivery of additional renewable energy generation is…essential for Ireland to meet its climate targets."

A number of new or amended National Policy Objectives (NPOs) have been proposed in order to achieve this objective including the following:

NPO 70: to promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a climate neutral economy by 2050.

The Project is anticipated to have the capacity to generate 54 MW of renewable wind energy, contributes towards the national target of a zero carbon and climate resilient Ireland by 2050 by displacing greenhouse gas emitting fossil fuels and reducing Ireland's carbon footprint.

NPO 71: Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development.

The Project will contribute directly and in the long-term to the national electricity grid infrastructure by strengthening it through the addition of electrical transmission infrastructure and through renewable energy generation.

NPO 72: Support an all-island approach to the delivery of renewable electricity through interconnection of the transmission grid.

NPOs 71 and 72: provide increased support for the development, upgrading and interconnection of onshore grid infrastructure, compared with the previous NPF.

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

This is an increase in the level of support for co-location of renewables, compared with the previous NPF.

NPO 74 requires each Regional Assembly to plan, through their Regional Spatial and Economic Strategy, how and where to deliver the required capacity set out in Table 9.1 by identifying capacity allocations for each Local Authority in its area. The Southern Region has 40% of the total percentage of the national share. In turn, NPO 75 requires Local Authorities to plan, through their City and County Development Plans, for the delivery of the energy capacity target that they have been allocated.

Table 9.1 from the NPF First revision (extract below) sets out these regional renewable energy capacity allocations for wind and solar energy. These targets require each region to plan for sufficient wind and solar energy development so that Ireland achieves the overall national target of 9GW onshore wind and 8GW onshore solar by 2030.

Table 9.1 | Regional Renewable Electricity Capacity Allocations

Region	Energised capacity 2023 (MW)	Additional Renewable Power Capacity Allocations (MW)	Total % of National Share in 2030	Energised Capacity 2023 (MW)	Additional Renewable Power Capacity Allocations (MW)	Total % of National Share in 2030
	Onshore Wind			Solar PV		
Eastern and Midlands	284	1,966	25%	306	3,294	45%
Northern and Western	1,761	1,389	35%	0.3	959	12%
Southern	2,622	978	40%	138	3,302	43%
Total	**4,667**	**4,333**		**445**	**7,555**	

This significant change in national policy represents a more active and prescriptive approach to land use planning for renewable energy development, giving increased emphasis to its importance.

A Shared Goal in the NPF is the transition to a Carbon Neutral and Climate Resilient Society. The Climate Action and Low Carbon Development (Amendment) Act was enacted in 2021 with a commitment to a legally binding target to reduce greenhouse gas emissions by 51% and increase the share of electricity generated from renewable sources to 80% over the decade (2021 – 2030), and to achieve net- zero emissions no later than 2050.

This objective will shape future development in line with the National Climate Action Plan 2024 and the National Adaptation Framework. New energy systems and transmission grids will be necessary for a more distributed, renewables-focused energy generation system,

Having regard to this evaluation, each Region must plan for sufficient wind and solar energy development in order to achieve the targeted regional renewable electricity capacity allocations outlined in Table 9.1, taking into account factors influencing delivery including attrition rates and changes to energised capacity levels, (in addition to current installed energised capacity), in order to facilitate, at a minimum, the 2030 national renewable electricity generation targets.

The Framework recognises and supports that in order to meet Regional Renewable Electricity Capacity Allocations and to ensure that the electricity can be both accepted on the national grid and brought to demand users, this will require the development and expansion of the electricity grid, at a national and local level, in a coordinated manner.

Each Regional Assembly has yet to prepare a Regional Renewable Electricity Strategy (RRES), whereby additional detail will be outlined on how the regional renewable electricity capacity allocations for the region can be best achieved in a consistent and sustainable manner, including the identification of specific targets for each of the constituent local authorities.

4.4.5 The National Development Plan

On July 22nd, 2025, the Government unveiled a landmark update to its National Development Plan (NDP). The NDP guides strategic development and infrastructure investment at the national level. The 2018-2027 NDP set out investment priorities of €21.8 billion for climate action for the 10-year period, €7.6 billion, to come from the Exchequer. The remaining investment, to be made by Ireland's semi-state companies and by the private sector. In addition, some €8.6 billion funding has been made available for sustainable mobility projects, mostly in public transport. This has been a substantial funding increase and it was considered, would facilitate upscaling of investments and implementation of actions needed to move the Country towards its 2030 climate targets.

However, this new update is a bold revamp roadmap for Ireland's future that from 2026 to 2035. With a projected investment of over €275 billion, this is the largest infrastructure and capital investment programme in the history of the state.

The plan sets out €102 billion in funding for the first five years - from 2026 to 2030 -and allocates an additional €100 billion through 2035. The allocations from 2026 and 2030 for Climate and Energy is over €5.6 billion, including equity to modernise Ireland's electricity grid and water systems. The Priorities & Strategic Goals includes billions flowing into strengthening the national grid to support wind, solar, and data-driven power demand.

4.4.6 Overall conclusions

The Project makes a contribution to a significant number of policy objectives in the First Revision of the National Planning Framework, especially relevant are: 70, 71, 73, 74 and 75 in relation to renewable energy and electrical infrastructure and policy objective 69 and 93 in relation to reducing Ireland carbon footprint and greenhouse gas emissions and improving air quality. The Project contributes to policy objective 31 and 32 in relation to the rural economy and regional growth and 68 in relation to electrification. The Project is in compliance with policy objectives 67, 79, 84, 86, 87 in relation to environmental protection and biodiversity enhancement and policy objective 94 regarding the protection of population and human health including noise.

4.4.7 Energy Security in Ireland to 2030

Energy Security in Ireland to 2030 outlines a new strategy to ensure energy security in Ireland for this decade, while ensuring a sustainable transition to a carbon neutral energy system by 2050. This report is being published as part of an Energy Security Package, containing a range of supplementary analyses, consultations, and reviews, which have informed the recommendations and actions related to energy security.

Informed by the Government's energy security policy objectives - to ensure energy is affordable, sustainable, and secure - the review considered the risks to oil, natural gas, and electricity. The report sets out that Ireland's future energy will be secure by moving from an oil and gas-based energy system to an electricity-led system, maximising our renewable energy potential, flexibility and being integrated into Europe's energy systems. Meeting our climate, renewable, and energy efficiency targets through actions and measures set out in the annually updated Climate Action Plan will deliver this secure energy future.

As we transition, the Energy Security Package states that we must ensure energy security is prioritised, monitored, and reviewed regularly, and includes a range of measures to implement this approach in the short and medium term by prioritising:

- Reduced and Responsive Demand
- A Renewables-Led System

- More Resilient Systems
- Robust Risk Governance

Under each of these four areas of actions, the report sets out a range of mitigation measures, including the need for additional capacity of indigenous renewable energy, but also energy imports, energy storage, fuel diversification, demand side response, and renewable gases. The governance structures supporting the energy system, including oversight and accountability reforms, were also examined.

4.4.8 National Energy and Climate Plan 2021-2030

The National Energy and Climate Plan[23] (NECP) is a ten-year integrated document mandated by the European Union to each of its member states in order for the EU to meet its overall greenhouse gases emissions targets. The plan is required to be updated every two years and an updated version was released on 29th July 2024.

The plan establishes key measures to address the five dimensions of the EU Energy Union:
1) Decarbonisation: GHG emissions and removals and Renewable Energy;
2) Energy efficiency;
3) Energy security;
4) Internal energy market, and
5) Research, innovation and competitiveness.

The plan notes that Ireland has excellent renewable energy resources, it credits renewable energy with increasing sustainability through the use of clean power sources and enhancing energy security by reducing Ireland's dependence on imported fuels.

Key, relevant renewable energy objectives include:

- Ireland has established an objective of achieving a 34% share of renewable energy in energy consumption by 2030.
- Increase electricity generated from renewable sources to 70% (note this target has been increased to 80% in the CAP2025), underpinned by the Renewable Electricity Support Scheme (RESS). Streamline consenting and connection arrangements.
- Phase-out of coal and peat-fired electricity generation.
- Increase onshore wind capacity by up to 8.2 GW (note this target has been increased to 9 GW in the CAP2025).

[23] Department of Communications, Climate Action and Environment. (2024). National Energy and Climate Plan hhttps://www.gov.ie/en/publication/a856a-national-energy-and-climate-plan-necp-2021-2030/#:~:text=National%20Energy%20and%20Climate%20Plans,the%20Governance%20of%20the%20Energy Accessed 08/12/24

- Support efforts to increase indigenous renewable sources in the energy mix, including wind, solar and bioenergy.
- Facilitate infrastructure projects, including private sector commercial projects, which enhance Ireland's security of supply and are in keeping with Ireland's overall climate and energy objectives.

The Project, by producing renewable energy, is in line with the NECP, this helps to meet the plan objectives of reducing GHG emissions, improving energy security, phasing out fossil fuels and renewable energy targets. The project will also help meet the key renewable energy objective of increasing onshore wind capacity by up to 8.2 GW (note this target has been increased to 9 GW in the CAP2024 and CAP2025).

4.4.9 Programme for Government 2025: Securing Ireland's Future

Published in January 2025 by the Department of the Taoiseach, this is a Programme of investment and reform, backed by ambitious and credible actions, which will protect those things upon which our country values and relies, while also supporting significant progress in addressing critical social, economic, political, demographic and environmental challenges. It commits to sustained action to tackle the climate crisis; to decarbonise the economy; and harness the digital and AI revolution to deliver effective and modern public services and to grow the economy. It commits to taking the necessary action to deliver at least 80% renewable electricity by 2030. Increased renewable energy, alongside energy efficiency and the circular economy are integral to the programme.

The Project is in compliance with Programme for Government 2025 as it provides additional renewable energy, helping to meet the commitments to increase renewable energy, reduce greenhouse gas emissions and the transition to a carbon neutral future.

4.5 The Regional Spatial and Economic Strategy (RSES) for the Southern Regional Assembly (SRA)

The Regional Spatial and Economic Strategy (RSES) for the Southern Regional Assembly (SRA) came into effect on 31st January 2020. The objective of the RSES is to support the implementation of the National Planning Framework and the economic policies and objectives of the Government by providing a long-term planning and economic framework which shall be consistent with the National Planning Framework (NPF) and the economic policies or objectives of the Government. The RSES sets objectives at a regional level, informs the County Development Plan and Local Area Plans.

The RSES provides a development framework of the region that supports the implementation of the NPF and the relevant economic policies and objectives of the government. It provides a 12-year strategy for the period 2019 – 2031 to achieve the objectives and vision of the regional assembly. Within the RSES, the Regional Policy Objectives (RPO) in relation to renewable energy are set out in **Table 4.1.**

Table 4.1: Key Planning Policy Objectives from the RSES

Regional Policy Objective (RPO)	Assessment
RPO 40 Regional Economic Resilience; It is an objective to sustainably develop, deepen and enhance our regional economic resilience by widening our economic sectors, boosting innovation, export diversification, productivity enhancement and access to new markets.	The Project represents a major investment in the region and in renewable energy. It will provide an improved and more resilient renewable electricity supply in the area. This could attract new enterprise to the region, bringing jobs, economic growth and diversification. The increased renewable electricity supply will also help to meet increased demand to facilitate further economic growth.
RPO 46 Digital and Physical Infrastructure in Rural Areas; It is an objective to expedite the completion of infrastructure servicing diverse settlements to support innovation, enterprise start-ups and competitiveness. This includes high quality broadband and mobile communication services to all rural locations, water and wastewater facilities for the growth of settlements, ***sustainable energy supply****, enhanced transport connectivity including rural public transport services and greenway walking and pedestrian corridors between settlements.*	The Project by producing renewable electricity in a rural area, provides a sustainable energy supply. The Project includes a substation and grid connection which will become an asset of the national grid, upgrading the physical electricity infrastructure in the region. The distribution bays at the Substation have the potential to power local projects, such as the proposed park and ride facilities (including EV charging facilities) at Charleville and Bruree as part of the N/M20 project. Providing renewable electricity, the Project further boosts the positive environmental effect of an increase in electronic vehicle use, including those in rural public transport services. It also increases the stability of energy supply to meet the growing demand of increased electrification.

Regional Policy Objective (RPO)	Assessment
RPO 49 Innovation in Rural areas; It is an objective to support innovation, enterprise start-ups and competitiveness of our rural Region.	The Project is located in a rural area, it represents a significant investment into the locality in an innovative and sustainable industry. The community benefit fund associated with the Project would amount to an average of € 250,000 per annum. The Project will also create local employment opportunities throughout the construction, operational and decommissioning phases. These opportunities include local contractors being employed, local suppliers being sourced when possible, and the use of hotels and other services. It will provide an additional supply of renewable electricity within the county. This could attract new enterprise to the region, bringing jobs, economic growth and population increases. The introduction of renewable electricity helps to stabilise and reduce electricity costs, making Ireland a more attractive investment location. The increased renewable electricity supply will also help to meet increased demand to facilitate further economic growth.

Regional Policy Objective (RPO)	Assessment
RPO 50 Diversification; It is an objective to further develop a diverse base of smart economic specialisms across our rural Region, including innovation and diversification in agriculture (agri-Tech, food and beverage), the marine (ports, fisheries and the wider blue economy potential), forestry, peatlands, ***renewable energy****, tourism (leverage the opportunities from the Wild Atlantic Way, Ireland's Ancient East and Ireland's Hidden Heartlands brands), social enterprise, circular economy, knowledge economy, global business services, fin-tech, specialised engineering, heritage, arts and culture, design and craft industries as dynamic drivers for our rural economy.*	The Project is a renewable energy project. The Site is located in agricultural lands, represents diversification for the farmers involved. The Project also provides the opportunity to reinforce the existing local renewable energy industry knowledge and skills base through employment, providing stability and diversity to the rural economy that can drive further investment.

Regional Policy Objective (RPO)	Assessment
RPO 56 Low Carbon Economy; *a. The RSES recognises the urgency to transition to a low carbon future and it is therefore an objective to accelerate the transition towards low carbon economy and circular economy through mechanisms such as the Climate Action Competitive Fund;* *b. It is an objective to develop enterprises that create and employ green technologies.* *c. Local authorities should ensure that the development of green industry and technologies incorporates careful consideration of potential environmental impacts at project level including the capacity of receiving environment and existing infrastructure to serve new industries.* *d. Local authorities shall include objectives in statutory land use plans to promote energy conservation, energy efficiency and the use of renewable energy sources in existing 33buildings, including retro fitting of energy efficiency measures in the existing building stock, energy efficiency in traditional buildings and initiatives to achieve Nearly Zero-Energy Buildings (NZEB) standards in line with the Energy Performance of Buildings Directive (EPBD).*	Renewable energy, wind energy in particular, is identified throughout this review as being required to play a vital role in mitigating climate change by transitioning to a low carbon economy and society. The Project will contribute to the regions electricity network by producing 54MW of renewable electricity. The site location has been selected for its excellent wind resource and minimal environmental impacts; these impacts have been assessed throughout the EIAR. By producing renewable energy for use in the region, the Project helps to contribute to lowering the carbon footprint of existing and new buildings. It is estimated that 46,689 of CO_2 will be displaced over the proposed 35-year lifetime of the wind farm.

Regional Policy Objective (RPO)	Assessment
e. It is an objective to support investments in 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'. Local authorities shall report annually on energy usage in all public buildings and will achieve a target of 33% improvement in energy efficiency in all buildings in accordance with the National Energy Efficiency Action Plan (NEEAP)	
RPO 96: Integrating Renewable Energy Sources; To support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate renewable energy sources and ensure our national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grows.	The Project produces renewable wind energy by harnessing the wind resource of the southern region and helping to meet the increased energy demand as the regional economy grows. The Project includes a substation and grid connection which will become assets of the national grid, upgrading the electricity infrastructure in the region.

Regional Policy Objective (RPO)	Assessment
RPO 99: Renewable Wind Energy; To support the sustainable development of renewable wind energy (onshore and offshore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.	The Project is an excellent example of sustainable development and is located in an area designated '*"Preferred Area"*' for wind farm development in the Limerick Development Plan. The Project has been designed in accordance with the current Wind Energy Development Guidelines 2006 and has had regard to the Draft Revised Wind Energy Development Guidelines 2019
RPO 100: Indigenous Renewable Energy Production and Grid Injection; To support the integration of indigenous renewable energy production and grid injection.	The Project will provide 54MW of renewable, indigenously produced wind energy. This additional renewable power generated will contribute to a reduction in greenhouse gas emissions from fossil fuels, improve regional/national energy security and help Ireland achieve our renewable electricity targets.

The RSES recognises and aims to support the many opportunities for wind as a major source of renewable energy. It declares that opportunities for both commercial and community wind energy projects should be harnessed, having regard to the requirements of DoHPLG Guidelines on Wind Energy. It also states that wind energy technology has an important role in delivering value and clean electricity for Ireland.

Action EL/23/2 of the Climate Action Plan, 2023 required the publication of a Renewable Electricity Spatial Policy Framework to set out targets for onshore renewable electricity to inform spatial plans and that a roadmap for the development of the Regional Electricity Strategies be published by Q4, 2023. It is noted that this has not yet been published.

As identified in **Table 4.1** above, the Project is in line with the regional policies as set out in the RSES. By producing renewable energy, in a suitable location, the Project contributes to policies associated with transitioning to a low carbon economy, economic development and rural diversification. This contributes to positioning County Limerick as a leader in delivery of renewable electricity for the Southern Regional Assembly region.

4.6 Limerick Climate Action Plan 2024-2029

The Climate (Amendment) Act 2021 specifically requires all local authorities in Ireland to prepare and make a Climate Action Plan. It stipulates that all local authorities need to prepare a LACAP that specifies the mitigation and adaptation measures to be adopted by the local authority for a period of 5 years. These plans will drive mitigation and adaptation measures at the local level, translating the national policy to the specific local situation in meeting the National Climate Objective.

Limerick City and County Council recognises the need for a shift and to play its role as a key stakeholder in making the transition to a low carbon economy. The Limerick Climate Action Plan 2024-2029 sets out key actions that will support County Limerick in its transition to becoming a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy by 2050.

The Climate Action Plan for 2024 to 2029 will build on the work achieved by the previous Climate Adaption Plan and County Development Plan and will demonstrate the increased ambition of Limerick City and County Council to play a significant role in delivering adaptation and mitigation measures at local and community levels.

The Climate Action Plan is a key instrument that strengthens the links between both national and international climate policy and the delivery of effective climate action at local and community levels, through place-based climate action.

Section 4.2.5.1 of this Plan refers to Renewable Energy Sources, and states that Limerick City and County Council will support an increase in renewable energy sources across the county and will prepare a Renewable Energy Strategy for the County that will include, wind, solar, integrated renewables as well as District Heating, Green Hydrogen, Anaerobic Digestion, including Bio Compressed Natural Gas.

4.7 Relevant Planning Policies from the Limerick Development Plan (LDP) 2022 - 2028

The Limerick Development Plan (LDP) 2022 – 2028 sets out the Council's overall strategy for the proper planning and sustainable development of County Limerick in accordance with the Planning and Development Act 2000 (as amended). The LDP states that:

"At the core of the vision are cohesive and sustainable communities, where our cultural, natural and built environment is protected. The vision embraces inclusiveness and a high quality of life for all, through healthy place-making and social justice, including the ongoing development of the Regeneration Areas and disadvantaged communities. An integrated

approach will align housing and public transport provision. Human and environment wellbeing including climate adaptation are at the core of the vision."

One of LDP's key ambitions is to: *"develop as an environmentally sustainable and carbon neutral economy - a pioneer in sustainable growth. This will be underpinned by the promotion of active mobility for all, creating an attractive and distinctive place to live, work and visit."*

Renewable energy continues to play an important role in terms of energy production nationally and within Limerick. As technologies emerge and alter, Limerick needs to position itself, to ensure that it has a safe, secure, sustainable and affordable supply of energy, which is central in securing sustainable development. Renewable energy is defined as renewable non – fossil energy sources such as, but not limited to wind, solar, geothermal, wave, tidal, hydropower, bioenergy, landfill gas, sewerage treatment plant gas, bio gases and bio – char, in the EU Renewable Energy Directive.

The Climate Action Plan 2021 included targets to increase the capacity of renewable energy in Ireland. Ireland has a target of 80% of electricity sourced from renewables by 2030. The development of the updated Wind Energy Guidelines and the Renewable Electricity Development Plan will also facilitate informed decision making in relation to onshore renewable energy infrastructure.

The Limerick Development Plan recognises that Local Authorities must be consistent with the following national plans, policies and strategies when considering proposals for renewable energy:

- The National Renewable Energy Action Plan 2010;
- The Government's Strategy for Renewable Energy 2012 – 2020;
- The Government's White Paper on Energy Policy - Ireland's Transition to a Low Carbon Energy Future 2015-2030;
- Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (July 2017);
- Wind Energy Development Guidelines, Planning Guidelines (2006), as amended or replaced;
- National Mitigation Plans (compliant with the Climate Action and Low Carbon Development Act, 2015).

Section 9 of the Plan looks at Climate Action, Flood Risk and Transition to Low Carbon Economy. It recognises that our climate is changing rapidly and the effects on the country and on our lives is becoming more evident. The response to the effects is wide ranging and have economic, environmental and social costs associated with them. The plan recognises that the business as usual model, cannot continue and there is a need to reconsider the approach to the way we live our daily lives, in terms of reducing environmental impacts and our carbon footprint. The Plan states that Ireland needs to commence the transition to a low carbon economy, with a reduction on reliance on fossil fuels and unsustainable use of resources.

LDP supports the concept of generating renewable energy and acknowledges the significant contribution that wind energy can make as a clean sustainable solution to energy requirements and its vital role in helping achieve national targets in relation to fossil fuel reductions and consequently greenhouse gas emissions. A range of energy and renewable energy policies and objectives are identified throughout the LDP and included in these, relevant to the Project are the following:

Table 4.2: Relevant Policies from the Limerick Development Plan (LDP) 2022-2028

LDP Development Objective **Renewable Energy: Objectives and Policy**	Statement of Compliance
CAF P6: *It is a policy of the Council to support renewable energy commitments outlined in national and regional policy, by facilitating the development and exploitation of a range of renewable energy sources at suitable locations throughout Limerick, where such development does not have a negative impact on the surrounding environment landscape, biodiversity, water quality or local amenities, to ensure the long-term sustainable growth of Limerick*	The proposed Project is anticipated to have the capacity to generate between 54MW of renewable electricity through the indigenous wind resource, therefore contributing to national and regional renewable energy policies. The LDP 2022-2028 includes renewable energy targets for 2030, including a 386.45MW target for wind. The current installed capacity of County Limerick stands at 243.35MW, leaving a short fall of 152.1MW to be achieved in the next 5 years. The Project would contribute circa 36% of this target for new onshore wind energy in Limerick.

LDP Development Objective **Renewable Energy: Objectives and Policy**	**Statement of Compliance**
CAF O27: *It is an objective of the Council to encourage and facilitate the production of energy from renewable sources, such as from bioenergy, solar, hydro, tidal, geothermal and wind energy, subject to appropriate levels of environmental assessment and planning considerations.*	The Project is a wind energy project which is anticipated to have the capacity to generate between 54MW of renewable electricity. An application for consent, supported by this EIAR and NIS, will be submitted to the Commission which will ensure that the Project is subject to appropriate levels of environmental assessment and planning considerations during the consenting process.
CAF O28: *It is an objective of the Council to encourage the development of wind energy, in accordance with Government policy and having regard to the principles and planning guidance set out in the Department of Housing, Planning and Local Government publications relating to Wind Energy Development and the DCCAE Code of Practice for Wind Energy Development in Ireland and any other relevant guidance, which may be issued in relation to sustainable energy provisions during the course of the Plan*	The Project is anticipated to have the capacity to generate between 54MW of renewable electricity through the indigenous wind resource. The proposed Project will be constructed, operated and decommissioned in line with Government policy and guidance and 'Wind Energy Development Guidelines' (2006) or any revisions thereof which may be issued during the lifetime of the Plan. Public consultation has been carried out in line with the DCCAE Code of Practice for Wind Energy Development, full details on public consultation can be found in Chapter 1: Introduction and Appendix 1.5: Community Engagement Report.
CAF O29: *It is an objective of the Council to facilitate the development of wind energy in an environmentally sustainable manner, ensuring proposals are consistent with the landscape character objectives of the Plan, the protection of the natural and*	The Project falls within wind energy designation zone labelled **'Preferred'** in the Limerick Development Plan, the aim of the CDP is to encourage the placement of wind farms and related infrastructure in these preferred areas, which the Project complies with. From the assessment carried out in **Chapter 12: Landscape and Visual**, it is not considered that there will be any significant effects

LDP Development Objective Renewable Energy: Objectives and Policy	Statement of Compliance
built environment and the visual and residential amenities of the area.	on landscape and visual amenity from the Project. Shadow flicker will comply with the 2006 Guidelines, with proposed mitigation measures, as shown in **Chapter 14: Shadow Flicker**. As shown in **Chapter 11: Noise**, the effects of noise from the operation of the Project have been assessed using 2006 Guidelines with the methodology described in ETSU-R-97 and the IOA Good Practice Guide. Noise levels during operation of the Project have been predicted using the best practice of calculation technique. They have been compared with the noise limits in the 2006 Guidelines and the limits prescribed in conditions in recent 2025 An Bord Pleanála decisions and found to be compliant.
CAF O30: *It is an objective of the Council to promote the location of wind farms and wind energy infrastructure in the 'preferred areas' as outlined on Map 9.1, to prohibit such infrastructure in areas identified as 'not open for consideration' and to consider, subject to appropriate assessment, the location of wind generating infrastructure in areas 'open for consideration'.*	The Project falls within wind energy designation zone labelled **'Preferred'** in the Limerick Development Plan. According to **CAF O30**, the aim is to encourage the placement of wind farms and related infrastructure in preferred areas specified on Map 9.1 in the CDP, prohibit such development in designated "not open for consideration" and potentially consider, after appropriate assessment, installing wind energy infrastructure in areas marked as "open for consideration."
CAF P1: *It is a policy of the Council to implement international and national objectives, to support Limerick's transition*	The Project represents a significant input into the provision of renewable energy in County Limerick and will therefore support the transition

LDP Development Objective Renewable Energy: Objectives and Policy	Statement of Compliance
to a low carbon economy and support the climate action policies included in the Plan.	to a lower carbon economy and supporting climate action policies.
It is an objective of the Council to: a) Support the National Adaptation Framework 2018 and the National Climate Change Strategy, including the transition to a low carbon future, taking account of flood risk, the promotion of sustainable transport, soil conservation, the importance of green infrastructure, improved air quality, the use of renewable resources and the re-use of existing resources. b) Support the implementation of the Limerick Climate Change Adaptation Strategy (2019) while cognisance shall be had of any revised or forthcoming adaptation, mitigation or climate action strategies or plans at local, regional and national level in the formulation of any plans or policies.	The proposed project aligns clearly with this objective as it meets all the objectives of the National Climate Change Strategy and as a result, will support the Limerick Climate Change Adaptation Strategy.

Section 9.2.6 of the Plan sets out Transition to a Low Carbon Economy. It states that is a complex subject with implications for the whole of society and its entire range of economic activities. Many different sectors will approach it from their own view point and many, like agriculture and forestry, largely lie outside the scope of planning regulation.

Table 4.2: Relevant Policies from the Limerick Development Plan (LDP) 2022-2028

LDP Development Objective	Statement of Compliance
CAF 09: It is an objective of the Council to promote climate resilience in development and economic activities that are regulated by planning. It is important to ensure that any developments are climate resilient as they will need to function in a climate altered environment. This means that they will be able to withstand increased intensity of storm events and rainfall and through adequate design, location and drainage elements, would not contribute to problems elsewhere, such as increased run off.	The proposed project has measures which include the reduced footprint being constructed above 1:20yr flood + climate During the operational phase the Access Tracks in the floodplain will be constructed above the 1 in 20 year level to allow access to all parts of the Site for maintenance and emergency service vehicles in the event of a flood. Design measures have been implemented that minimise both environmental and infrastructure risks associated with the Project. In the event of forecasted extreme flooding, a construction phase and operational phase flood event emergency response procedure has been prepared.
CAF P2 It is a policy of the Council to support the transition to a low carbon climate resilient economy, by way of reducing greenhouse gases, increasing renewable energy and improving energy efficiency and will future proof policies and objectives to deliver on this approach, in so far as possible.	This proposed project positively impacts the Council's policy.
CAF P4 It is a policy of the Council to cooperate with the Climate Action Regional Office (CARO) and other relevant stakeholders, in respect of adaptation and mitigation of greenhouse gas emissions and future climate change adaptation strategies.	The Council will be in a position to promote its own positive support of CARO

LDP Development Objective	Statement of Compliance
CAF 014 It is an objective of the Council to support the local production of renewable energy and connection to the gas network. Where electricity is being generated locally, the Council will support the provision of infrastructure for its transmission to the grid, subject to it fulfilling technical and environmental requirements.	The local natural asset of wind energy is being harnessed to be generated locally. This proposal is seeking consent for the wind farm and a grid connection to harness this energy

Section 9.3 of the Plan addresses Flooding, Flood Risk Management and Water Management. The Planning System and Flood Risk Management (DHPLG/OPW, 2009) and associated Technical Appendices and Circulars, are the basis of the Council's policy in relation to development and flood risk management. It plays a key part in informing zoning decisions and decisions on individual planning applications, where flood risk is identified as a factor. The guidelines ensure that the key principles of flood risk management and sustainable planning are adopted. The sequential approach to managing flood risk within the planning system is one of the first aspects to consider and where uncertainty exists, the precautionary approach is taken. The stages of appraisal and assessment are set out in the 2009 Guidelines.

In the preparation of the Plan, in accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities, a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area. The SFRA is set out in Volume 4 of the Plan. The precautionary approach has largely been employed to land use zoning to avoid directing development towards areas at risk of flooding. The Site is partly located in a flood zone according to the Catchment Flood Risk Assessment and Management (CFRAM) OPW Flood Risk Assessment Maps associated with the River Maigue and its tributaries, in particular, the Charleville Stream. A Stage III level site-specific FRA has been carried out for the Site to assess the capacity and design flood levels of the river channel network at the Site (Maigue River, River Loobagh and Charleville Stream). Proposed turbines T4, T5, T6, T7, and T8 are located in the 100-yr and 1000-yr design flood events. The northern part of the main Access Track through the Site is located in the mapped flood zone and hence has been designed relative to existing ground levels to reduce the footprint of the Access Track and hardstand infrastructure in the floodplain during

construction. The Hardstands will be reduced in size during the operational phase and the reduced footprint will be constructed above 1:20yr flood + climate change (cc) level. During the operational phase the Access Tracks in the floodplain will be constructed above the 1 in 20 year level to allow access to all parts of the Site for maintenance and emergency service vehicles in the event of a flood. Design measures have been implemented that minimise both environmental and infrastructure risks associated with the Project. In the event of forecasted extreme flooding, a construction phase and operational phase flood event emergency response procedure has been prepared.

Table 4.2: Relevant Policies from the Limerick Development Plan (LDP) 2022-2028

LDP Development Objective Flooding	Statement of Compliance
CAF P5 It is a policy of the Council to protect Flood Zone A and Flood Zone B from inappropriate development and direct developments/land uses into the appropriate lands, in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 (or any subsequent document) and the guidance contained in Development Management Standards and the Strategic Flood Risk Assessment (SFRA). Where a development/land use is proposed that is inappropriate within the Flood Zone, but that has passed the Plan Making Justification Test, then the development proposal will need to be accompanied by a Development Management Justification Test and Site-Specific Flood Risk Assessment in accordance with the criteria set out under The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 and Circular PL2/2014 (and any subsequent updates). This will need to demonstrate inclusion of measures to	Proposed turbines T4, T5, T6, T7, and T8 are located in the 100-yr and 1000-yr design flood events. The northern part of the main Access Track through the Site is located in the mapped flood zone and hence has been designed relative to existing ground levels to reduce the footprint of the Access Track and hardstand infrastructure in the floodplain during construction. The Hardstands will be reduced in size during the operational phase and the reduced footprint will be constructed above 1:20yr flood + climate change (cc) level. During the operational phase the Access Tracks in the floodplain will be constructed above the 1 in 20 year level to allow access to all parts of the Site for maintenance and emergency service vehicles in the event of a flood. Design measures have been implemented that minimise both environmental and infrastructure risks associated with the Project. In the event of forecasted extreme flooding, a construction phase and operational phase flood event emergency response procedure has been prepared.

LDP Development Objective Flooding	Statement of Compliance
mitigate flood and climate change risk, including those recommended under Part 3 (Specific Flood Risk Assessment) of the Site-Specific Plan Making Justification Tests detailed in the SFRA. In Flood Zone C, the developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed and should consider other sources of flooding, residual risks and the implications of climate change.	
CAF 020: *It is an objective of the Council to require a Site-Specific Flood Risk Assessment (FRA) for all planning applications in Flood Zones A and B and consider all sources of flooding (for example coastal/tidal, fluvial, pluvial or groundwater), where deemed necessary. The detail of these Site-Specific FRAs (or commensurate assessments of flood risk for minor developments) will depend on the level of risk and scale of development. The FRA will be prepared taking into account the requirements laid out in the SFRA, and in particular in the Plan Making Justification Tests as appropriate to the particular development site. A detailed Site-Specific FRA should quantify the risks, the effects of selected mitigation and the management of any residual risks. The assessments shall consider and provide information on the implications of climate change with regard to flood risk in relevant locations.*	The Site is partly located in a flood zone according to the Catchment Flood Risk Assessment and Management (CFRAM) OPW Flood Risk Assessment Maps associated with the River Maigue and its tributaries, in particular, the Charleville Stream. A Stage III level site-specific FRA has been carried out for the Site to assess the capacity and design flood levels of the river channel network at the Site (Maigue River, River Loobagh and Charleville Stream). Proposed turbines T4, T5, T6, T7, and T8 are located in the 100-yr and 1000-yr design flood events.

The Plan sets out policy on Environment, Heritage, Landscape and Green Infrastructure. There is huge variety in the natural, built and cultural heritage of Limerick. The purpose of the Plan is to guide decision- making on what we choose to hand onto the next generation, through protection, management, sensitive enhancement or appropriate repurposing. It is recognised that the conservation and enhancement of and access to Limerick's heritage has the potential to contribute to individual well-being, shared community identities, social cohesion and the liveability of our towns and villages as well as our visitor economy.

At national level Ireland has recognised the importance of its natural and built heritage through becoming a signatory to international conventions. These include the Florence Convention for the Protection of the European Landscape, the Valetta Convention on the Protection of the Archaeological Heritage and the Granada Convention for the Protection of the Architectural Heritage. These international commitments are backed by appropriate legislation, which has implications at local level and the Planning Authority has cognisance of this while implementing planning functions. European Union Directives also have implications in regard to how the Planning Authority and those developing and using land in Limerick, conduct their business. As legislation is enacted, or Directives are translated into domestic law, the Planning Authority will respond to the evolving situation.

Table 4.2: Relevant Policies from the Limerick Development Plan (LDP) 2022-2028

LDP Policies and Development Objectives Environment, Landscape and Green Heritage	Statement of Compliance
EHP1 It is a policy of the Council to: a) Protect and conserve Limerick's natural heritage and biodiversity, in particular, areas designated as part of the European Sites Natura 2000 network, such as Special Protection Areas (SPAs) and Special Areas of Conservations (SACs), in accordance with relevant EU Directives and national legislation and guidelines. b) Maintain the conservation value of all Natural Heritage Areas and proposed Natural Heritage Areas (pNHAs) for the benefit of existing and future generations.	The Natura Impact Statement has assessed the potential effects on the integrity of identified relevant European sites. All aspects of the proposed Project, by itself or in combination with other plans or projects, which may affect the relevant European Sites have been considered. In conclusion, on the basis of the assessment set out in the NIS, it is respectfully submitted that the competent authority is able to determine that no reasonable scientific doubt remains that the Proposed Project will not adversely affect the

LDP Policies and Development Objectives Environment, Landscape and Green Heritage	Statement of Compliance
	integrity of any European site, in view of the conservation objectives of that site. The conservation value of all NHAs and pNHAs will be maintained.
EHP 2 It is a policy of the Council to ensure the sustainable management and conservation of areas of natural environmental and geological value within Limerick and to protect, enhance, create and connect, where ecologically suitable, natural heritage, green spaces and high-quality amenity areas for the benefit of biodiversity.	The Biodiversity Chapter of the EIAR sets out a wide range of measures for the management and conservation of all these areas. A Biodiversity Enhancement Management Plan (BEMP) has been submitted. This will offset the loss of hedgerows and treelines (total 1,649m), which is required to facilitate the construction of the proposed wind farm development (1,008m) and to provide buffers around turbines to reduce the risk of collision for bats (641m). It is noted that the Plan will allow for remediations and/or modifications to ensure that the objectives are being achieved throughout the lifetime of the Project
EHP 3 It is a policy of the Council to take into account the contents of the National Biodiversity Action Plan and the Biodiversity Climate Adaptation Plan and any forthcoming guidance or legislation on climate action, whether adaptation or mitigation that will emerge during the course of the Plan.	All plans, guidance and legislation have been considered.

LDP Policies and Development Objectives Environment, Landscape and Green Heritage	Statement of Compliance
EHP 6 It is a policy of the Council to ensure that water and air quality shall be of the highest standard, to ensure the long term economic, social and environmental well-being of Limerick's resources. The World Health Organisation Air Quality Guidelines will be the basis for the air quality guidance in Limerick	Chapter 10 of the EIAR assesses the likely significant effects that the Project may have on hydrology and hydrogeology and sets out the mitigation measures proposed to avoid, reduce or offset any potential significant effects that are identified. Surface water drainage measures, pollution control and other preventative measures have been incorporated into the project design to minimise significant effects on water quality and downstream designated sites. A self-imposed 50m stream buffer was used during the design of the Project, thereby avoiding sensitive hydrological features. The surface water drainage plan will be the principal means of significantly reducing sediment runoff arising from construction activities and to control runoff rates. The key surface water control measure is that there will be no direct discharge of wind farm runoff into local watercourses or into the existing site drainage network. This will be achieved by avoidance methods (i.e. stream buffers) and design methods (i.e. surface water drainage plan). Preventative measures also include fuel and concrete management and a waste management plan which will be incorporated into the Construction and Environmental Management Plan. No significant effects to surface water (quality and flows) and groundwater (quality and quantity, and any local groundwater wells) will occur as a result of the Project provided the

LDP Policies and Development Objectives Environment, Landscape and Green Heritage	Statement of Compliance
	proposed mitigation measures are implemented. No significant effects on the water environment will occur during the construction, operation or decommissioning of the Project.
EHP 7 It is a policy of the Council to proactively manage environmental noise, where it may have a significant adverse impact on the health and quality of life of communities in Limerick and to support the aims of the Environmental Noise Regulations, through the development and implementation of Noise Action Plans.	Chapter 11 of the EIAR assesses the effects of the Project from noise and vibration impacts. The Project refers to all elements of the application for the construction, operation and decommissioning of the proposed Wind Farm including the Grid Connection, road traffic to the Site, and the 110kV Substation. The operational noise levels predicted at the nearest noise sensitive receptors are orders of magnitude below the level at which risk of hearing damage, or indeed negative health effects are possible. Therefore, the noise levels predicted at the nearest noise sensitive receptors may be deemed not significant. Noise during construction of the Project and Decommissioning will be managed to comply with best practice, legislation and guidelines current at that time so that effects are not significant.

The Limerick Development Plan recognises that the EU Biodiversity Strategy for 2030 is a comprehensive, ambitious, long-term plan for protecting nature and reversing the degradation of ecosystems. It aims to put Europe's biodiversity on a path to recovery by 2030, with benefits for people, the climate and the planet.

Section 6.3.2 of the Plan deals with Protected Sites and Species. Within Limerick, there exists a wide range of habitats, some are natural but there are many others which have evolved and been maintained, as a result of management over long periods of time. An example of some of Limerick's rich and diverse natural ecosystems includes the Shannon

Estuary, the riverine habitats of Limerick's rivers and their tributaries, including the Shannon. The Habitats Directive is one of the important pieces of legislation that exists for the protection of habitats and by extension species in the EU. The Habitats Directive includes Article 6 which is designed to ensure that European designated sites such as Special Areas of Conservation or Special Protection Areas are adequately protected from the adverse effects of development.

The Natural Heritage Areas, proposed Natural Heritage Areas, Special Areas of Conservation and Special Protection Areas in Limerick are identified in Maps in Volume 3.

The agricultural lowlands including the Golden Vale contribute to the extensive biodiversity of Limerick. In terms of protected species, one species in Limerick that is in danger of isolation is the Lesser Horseshoe Bat. The condition of these natural habitats and species, affects how they can provide ecosystem services, including providing resilience to climate change. It affects the quality of life of the residents and visitors to Limerick and is important in supporting local businesses such as tourism and recreation, highlighting the importance of protecting and enhancing our natural habitats and species. Therefore, there is a need for policies which will conserve what is best in Limerick's landscape, while at the same time successfully integrating suitable development.

Table 4.2: Relevant Policies from the Limerick Development Plan (LDP) 2022-2028

LDP Development Objective	Statement of Compliance
EH01 It is an objective of the Council to ensure that projects/plans likely to have significant effects on European Sites (either individually or in combination with other plans or projects) are subject to an appropriate assessment and will not be permitted under the Plan unless they comply with Article 6 of the Habitats Directive. The Council, will through the planning enforcement process where applicable, seek to restore the ecological functions of designated sites, where they have been damaged through inappropriate development.	The Natura Impact Statement has assessed the potential effects on the integrity of identified relevant European sites. All aspects of the proposed Project, by itself or in combination with other plans or projects, which may affect the relevant European Sites have been considered. In conclusion, on the basis of the assessment set out in the NIS, it is respectfully submitted that the competent authority is able to determine that no reasonable scientific doubt remains that the Proposed Project will not adversely affect the

LDP Development Objective	Statement of Compliance
	integrity of any European site, in view of the conservation objectives of that site.
EH 02 It is an objective of the Council to require all developments in areas where there may be Lesser Horseshoe Bats, to submit an ecological assessment of the effects of the development on the species. The assessment shall include mitigation measures to ensure that feeding, roosting or hibernation sites for the species are maintained. The assessment shall also include measures to ensure that landscape features are retained and that the development itself will not cause a barrier or deterrent effect on the species.	Section 6.3.5.1 of Chapter 6 of the EIAR, Biodiversity, states that the site does not lie within a lesser horseshoe bat range, with the closest records for this species lying 18 km to the northwest at Grange.
EH03 It is an objective of the Council to require all developments where there are species of conservation concern, to submit an ecological assessment of the effects of the development on the site and nearby designated sites, suggesting appropriate mitigation measures and establishing, in particular, the presence or absence of the following species: Otter, badger, bats, lamprey and protected plant species such as the Triangular Club Rush, Opposite Leaved Pond Weed and Flora Protection Order Species generally.	Chapter 6 of the EIAR on Biodiversity, along with the NIS and the Biodiversity Enhancement Managemnet Plan addresses all species of conservation concern.

Section 6.3.3 addresses Conservation outside Protected Sites. In addition to the formal designations for nature conservation, much of Limerick's natural heritage resources lie outside such designated sites. Many areas that do not have formal protection under legislation still possess a level of natural heritage importance, which needs to be recognised

and protected, where possible. These areas include woodlands, wetlands, semi- natural grasslands, hedgerows, trees, rivers, streams, private gardens and other urban green spaces.

The Council recognises the importance of these areas as buffer zones and 'linkages', between formally designated ecological sites. The Council will require all new developments, where possible to identify, protect and where appropriate enhance ecological features by making provision for local biodiversity and providing linkages to wider habitats.

Section 6.4 - addresses Landscape and Visual Amenity. Section 6.4.1 looks at Landscape Assessment and Landscape Character Areas. Limerick possesses a varied landscape which is important not just for its intrinsic value and beauty, but also because it provides for local residents and visitors, both in terms of a place to live and for recreational and tourism purposes. The importance of landscape and visual amenity in the role of planning is recognised in the Planning and Development Act 2000 (as amended). The Act require that Development Plans include objectives for the preservation of the landscape, views and prospects. It requires objectives for Landscape Conservation Areas, Areas of Special Amenity and also for the assessment of landscape character. This approach towards landscape issues based on the Draft Landscape Character Assessment Guidelines stresses the distinctiveness of differing kinds of landscape and how differing kinds of development can best be integrated within them.

The Landscape Character Areas are shown in Map 6.1 in the Plan. See below in this report.

Table 4.2: Relevant Policies from the Limerick Development Plan (LDP) 2022-2028

LDP Development Policies and Objectives Landscape	Statement of Compliance
EH P8 It is a policy of the Council to promote the distinctiveness and where necessary safeguard the sensitivity of Limerick's landscape types, through the landscape characterisation process in accordance with the Draft Guidelines for Landscape and Landscape Assessment (2000) as issued by the Department of Environment and Local Government, in accordance with the European Landscape Convention (Florence Convention) and with A National Landscape Strategy for Ireland – 2015- 2025. The Council shall implement any relevant recommendations contained in the Department of Arts, Heritage and the Gaeltacht's National Landscape Strategy for Ireland, 2015 – 2025.	Chapter 12 of the EIAR assesses the likely significant effects of the Project on the landscape and visual amenity of the receiving environment. The Assessment carried out concluded that it is not considered that there will be any significant effects on landscape and visual amenity arising from the proposed Garrane Green Energy Project

LCA 01 Agricultural Lowlands

This is the largest of the Landscape Character Areas in Limerick and comprises almost the entire central plain. This landscape is a farming landscape and is defined by a series of regular field boundaries, often allowed to grow to maturity. This well- developed hedgerow system is one of its main characteristics. In terms of topography, the landscape is generally rather flat with some locally prominent hills and ridges. The pastoral nature of the landscape is reinforced by the presence of farmyards. A Specific Objective in this area is to encourage the regular arrangement of turbines with equal spacing in proposed wind farm developments.

The Plan addresses Views and Prospects in Section 6.4.2. Limerick contains many sites and vantage points from which scenic views over areas of great natural beauty, local landmarks, historic landscapes, Shannon Estuary and adjoining Counties, may be obtained.

Section 6.5.1 deals with Archaeology. There is a stated preference under National Policy for preservation in situ. Consequently, the Planning Authority recommends that issues of archaeological heritage be addressed as early as possible by potential developers, through consultation with the relevant agencies, the Planning Department and the Local Authority Archaeologist. The Planning Authority will request potential developers to carry out archaeological assessments, in areas adjacent or in the vicinity of Recorded Monuments.

Projects can have a visual as well to the pastoral nature of farming. To date there are over 7,000 sites and individual monuments recorded in Limerick. These range from isolated pits to the inspiring ruins of the friary at Askeaton and the majestic King John's Castle in the City. They include the graves, homes, farmsteads and towns of our ancestors. They are an intrinsic part of the landscape, they form our immediate environment and shape our experience and outlook and they are part of what makes Limerick unique. They are also, however, a fragile and irreplaceable resource. Limerick City and County as a physical impact on the archaeological remains and developers are advised to respect the setting of the monuments in the wider landscape, when considering areas for development potential. The Planning Authority will refer all Projects likely to impact on the archaeological heritage to the National Monuments Service.

Table 4.2: Relevant Policies from the Limerick Development Plan (LDP) 2022-2028

LDP Development Objective Heritage	Statement of Compliance
EH 036 It is an objective of the Council to seek the preservation of all known sites and features of historical and archaeological interest. This is to include all the sites listed in the Record of Monuments and Places as established under Section 12 of the National Monuments (Amendment) Act 1994. The preferred option is preservation in situ, or at a minimum preservation by record.	The Project will not impact on any sites or features of archaeological interest, and any discovery further to geophysical testing will be preserved in accordance with the requirements of the Archaeologist
EH 037 It is an objective of the Council to protect and preserve the preservation in situ (or at a minimum by record) of all sites and features of historical and archaeological interest, discovered subsequent to the publication of the Record of Monuments and Places.	The Project will not impact on any sites or features of archaeological interest, and any discovery further to geophysical testing will be preserved in accordance with the requirements of the Archaeologist

LDP Development Objective Heritage	Statement of Compliance
EH 038 It is an objective of the Council to seek the preservation (in situ, or at a minimum, preservation by record) of all known and all previously unrecorded sites and features of historical and archaeological record in wetland, riverine, lacustrine, estuarine and or marine environments.	The Project will not impact on any sites or features of archaeological interest, and any discovery further to geophysical testing will be preserved in accordance with the requirements of the Archaeologist
EHO 40 It is an objective of the Council to: a) Ensure early engagement at pre-planning stage is undertaken with the Local Authority Archaeologist to promote the 'preservation in situ' of archaeological remains and settings in development. b) Adopt a policy of archaeological monitoring of developments where the scale and nature of such developments may, in the opinion of the Planning Authority, have a negative impact on previously unknown archaeological features/ artefacts. c) Require the preparation of an Archaeological Heritage Assessment in cases where it is deemed that Archaeological Heritage would be affected by a Project (due to their location, size or nature). The report shall be prepared by a suitably qualified archaeologist on the archaeological implications, if any, of the Project either prior to a decision on a planning application or prior to commencement of development on site.	The Project will not impact on any sites or features of archaeological interest, and any discovery further to geophysical testing will be preserved in accordance with the requirements of the Archaeologist.

Development Management Standards

Chapter 11 of the Development Plan sets out Development Management Standards. It states that in order to ensure the proper planning and sustainable development of Limerick, it is important that developments conform to the specific requirements set out in this chapter. It details generally what is required and the conditions under which a wind farm can be developed. It is submitted in the Planning Statement, which is supported by the details of the Application, the EIAR and NIS, that the development of this project will comply with these requirements.

11.7.2.1 deals with specifics of Wind Energy. It states:

"When assessing planning applications for wind energy developments the Planning Authority will have regard to the Wind Energy Development Guidelines for Planning Authorities (2006), published by the DoEHLG and the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017) and any subsequent updates. The Planning Authority will also have regard to Chapter 9: Climate Action, Flood Risk and Transition to Low Carbon Economy. It also states that developers should also refer to the Code of Practice for Wind Energy Development in Ireland, DCCAE, 2016 regarding observance with the best industry practices and with engagement of communities. With regard to EPA licensed developments, applicants are advised to refer to the EPA publication - Guidance Note on Noise Assessment of Wind Turbine Operations at EPA Licensed Sites (NG3), 2011.

The Application should also include an Assessment, including the size, scale and layout and the degree to which the wind energy project is visible over certain areas and in certain views. It should include information on the location of quarries to be used or borrow pits proposed during the construction phase and associated remedial works thereafter. Decommissioning and dismantling of the structures and access road/track and restoration of the site should be addressed. The Application should consider:

- Natural Heritage, including Environmental Assessments, the Landscape Character Areas of the Plan, or any future Seascape Character Assessment;
- Ground conditions, hydrology and topography, soil stability, surface drainage from all structures on site, including turbines, roads/tracks and substation;
- Architectural heritage;
- Noise and mitigation measures for sensitive receptor locations such as residences;
- Shadow flicker and mitigation measures;
- Electromagnetic interference;
- Environmental and ecological aspects
- Connection to the National Grid; – Landscape and Visual Impact
- Traffic movement and safety, during construction and when in operation;
- Carbon emissions balance if the development requires peat extraction;
- Disposal or elimination of waste/ surplus material from construction/site clearance, particularly significant for peatland sites;
- Cumulative impact with similar windfarm development in the area;
- Community engagement, investment and dividend;
- Previous planning history of the site.

In particular, the application states that the structure enclosing the substation shall be finished in dark green/dark brown colour to minimise visual impact in the Irish landscape. Landscaping proposals to reduce visibility of the ground level components of the development shall also be submitted.

Road and associated development to be planned and designed on the basis of the EIAR information, so as to minimise peat extraction, reduce the necessity for its disposal and mitigate changes in the site's hydrological regime. Access roads shall be uncovered and shall follow the natural contours of the site.

Fencing shall be only allowed around the substation and not on any other parts of the site, unless agreed as part of a rehabilitation programme for on-site vegetation. The fencing shall then be permitted for the length of time required to ensure recovery of the vegetation.

The applicant should demonstrate that wind speed monitoring has taken place in the last 12 months prior to the application being submitted and adequate wind speeds are available for the development. On sites with multiple turbines, the wind monitoring location shall be selected on prominent ridges, valley rims or other prominent locations. The siting and layout of turbines should take advantage of existing screening within the landscape and where possible, should follow and respect local land forms.

All turbines shall be similar in design and dimensions. All turbine blades shall rotate in the same direction. Turbine structures should be of matt finish and neutral colour and be reflected in the photomontage submitted.

The Planning Authority shall be informed of the plan to carry out background noise surveys and to agree proposed monitoring locations. Background noise surveys shall be carried out in accordance with A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise (2013), unless current guidelines require otherwise.

Planning applications shall include noise-monitoring proposals over the lifetime of the development. In the event that the developer proposes to modify the type of wind turbine in a way that may lead to increased noise levels at noise sensitive receptors, a noise assessment shall be undertaken, to be agreed with the Planning Authority, to demonstrate that relevant noise limits shall not be exceeded.

All proposals shall be referred to the Irish Aviation Authority for comment prior to submission.

Peatland hydrology - The influence that wind farms have on their surroundings varies depending on the sensitivity of the development location. In upland peat sites for example, there can be marked effects on peatland hydrology. An in-depth study of peat morphology, hydrology and vegetative cover will be required.

A base-line ecological survey shall be carried out and submitted to the Planning Authority for use in monitoring the development. The site shall be re- surveyed on an annual basis for five years after the commencement of the operation of the wind turbines and the information submitted to the Planning Authority.

A restoration and after-care programme, devised and agreed upon by the interested parties should be furnished before granting planning permission. An on-site hydrological monitoring and amendment programme to be agreed for the construction and operating phase of the development.

Adequate bonds shall be provided to meet the costs of agreed remedial and restorative works necessitated by the Project.

Timing and scheduling of site works to take into account the seasonal nature of wildlife activities, such as breeding seasons and site conditions.

The Planning Authority may grant permission for a duration longer than 5 years if it is considered appropriate, for example, to ensure that the permission does not expire before a grid connection is granted. It is, however, the responsibility of the applicants in the first instance to request such longer durations in appropriate circumstances.

Appropriate setback distance shall be determined on a case-by-case basis in line with the Wind Energy Guidelines 2006 and any subsequent update.

With regard to Landscape Character Areas in Limerick, in general, Shannon Integrated Coastal Management Zone single lines of equally spaced turbines are recommended to reduce the scenic impact. In the Agricultural Lowlands a more regular arrangement of turbines with equal spacing is recommended which takes into account field boundaries.

In relation to archaeological sites, it is recommended that turbines are located three times the turbine height away to prevent visual domination. In the case of particularly sensitive sites, the applicant may be requested to relocate the turbine. Notwithstanding any advances in technology the height and type of turbines will be determined by visual and landscape considerations."

This Project has had regard to all the above factors in the making of this Planning Application.

Limerick Landscape Character Assessment

The Landscape Character Assessment for Co. Limerick was compiled as part of the LDP 2022-2028. This assessment was prepared in accordance with the Draft Guidelines for Landscape and Landscape Assessment (2000) as issued by the Department of Environment and Local Government, the aim of which is to:

- Heighten awareness of the importance of landscape in all aspects of physical planning.
- Provide guidance to planners and others, as how to deal with landscape considerations.
- Indicate specific requirements for development plans and for development controls.

The County Limerick Landscape Character is assessed in Chapter 6: Environment, Heritage, Landscape and Green Infrastructure of the LDP 2022-2028.

Map 6.1 of the Landscape Character Assessment shows that the that the site is contained in LCA01 - 'Agricultural Lowlands' Landscape Character Area, close to the Ballyhoura / Slieve Reagh LCA (c. 3km southeast).

LCA 01 is described as:

"… the largest of the Landscape Character Areas in Limerick and comprises almost the entire central plain. This landscape is a farming landscape and is defined by a series of regular field boundaries, often allowed to grow to maturity. This well-developed hedgerow system is one of its main characteristics. In terms of topography, the landscape is generally rather flat with some locally prominent hills and ridges. The pastoral nature of the landscape is reinforced by the presence of farmyards".

There are specific objectives outlined for each Landscape Character Area in the Limerick CDP, the objectives for LCA 01 are as follows:

a) Encourage, where housing is permitted, design that reflects existing housing stock, such as the two-story farmhouses which are a feature in the area.

b) Encourage retention of existing landscape features such as hedgerows and trees and their incorporation into landscaping for new developments.
c) Discourage development of locally prominent sites.
d) Encourage the regular arrangement of turbines with equal spacing in proposed wind *farm developments, which take field boundaries into account.*
e) Encourage development within existing settlements.

The Site is not within a locally prominent site, with a low-lying, ostensibly flat landscape used primarily for agricultural farmland. The Project will result in the permanent loss of an estimated 1,008 m of hedgerow to facilitate the construction of the wind farm infrastructure, including internal access tracks and access points from public roads. In addition, an additional 641 m of hedging outside of the civil works will be removed for the purpose of providing bat buffers around turbines (where relevant) to minimise collision risk. The total loss of hedgerows is 1,679 m. To mitigate against this loss the proposed measures are outlined below, with further details found in **Chapter 6: Biodiversity** and **Appendix 6.2: BEMP of the EIAR**

- New hedge planting: 1,620 m
- Enhancement of existing hedging: 1,359 m
- Re-vitalisation of existing hedging: 4,074 m
- **Total** **7,053 m**

The Landscape and Visual Impact Assessment in **Chapter 12 - Landscape and Visual** of the EIAR assessed the impact of the Project against designated views and prospects in County Limerick and the impact to the overall landscape in County Limerick based on the sensitivity of the adjoining area, as defined in the LDP 2022 - 2028.

Compliance with Local policy

The Project will generate renewable energy, reducing Ireland's carbon footprint by displacing fossil fuels and contributing to climate policy mitigation objectives. The Project is compliant with local policy as it is supported by policies in the LDP 2022 - 2028 to increase and support renewable energy developments at a local level, while avoiding significant environmental or visual impacts. The LDP 2022-2028 includes renewable energy targets for 2030, including a 386.45MW target for wind. The current installed capacity of County Limerick stands at 243.35MW[24], leaving a short fall of 152.1MW to be achieved in the next 5 years. The Project would contribute circa 36% of this target for new onshore wind energy in Limerick.

[24] https://www.limerick.ie/sites/default/files/media/documents/2023-05/Limerick-Development-Plan-Volume-1-Written-Statement-including-Variation-No-1.pdf Accessed 26/07/2024

The Site is located in a "Preferred Area" for wind energy development (see Figure 4.1) in the LDP 2022-2028 and has been assessed under each of the topics contained in the EIAR and has been found to be in an appropriate location.

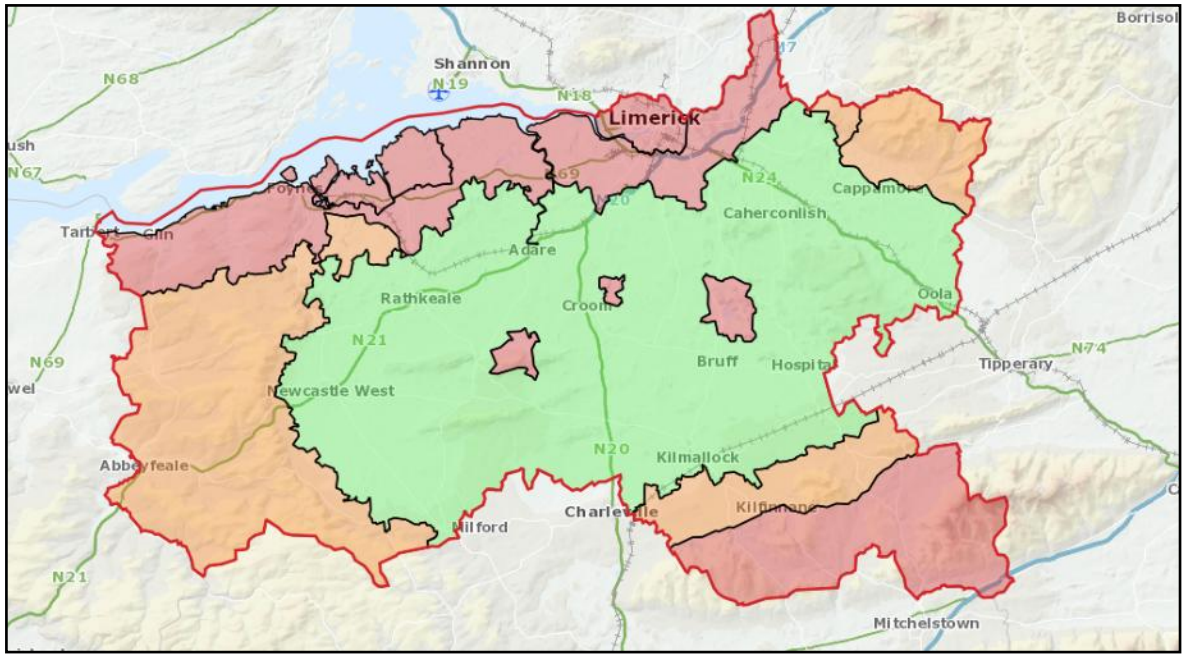


Figure 4.1 Limerick Development Plan 2022-2028 Chapter 9 (*Map 9.1: Wind Energy Locations)*

Other Core Planning Policy Documents

***The Wind Energy Development Guidelines* - Guidelines for Planning Authorities, (DoHLG, 2006)**

The Wind Energy Development Guidelines (DoHLG, 2006) advise that a reasonable balance must be achieved between meeting Government Policy on renewable energy and the proper planning and sustainable development of an area, and it provides advice in relation to the information that should be submitted with planning applications. The effects on residential amenity, the environment, nature conservation, birds and the landscape should be addressed. It states that particular landscapes of very high sensitivity may not be appropriate for wind energy development.

The Wind Energy Development Guidelines 2006 remain valid until the revised, Draft Wind Energy Guidelines 2019 are finalised and published by the government.

The Developer has had regard to the Draft Wind Energy Guidelines 2019, however as stated, the current version dated 2006 remain valid until the revised, final version of the Draft WEDGs (DOHLGH, 2019) are published by the government. The draft guidelines set

out how wind energy is to be delivered in accordance with best practice and in particular, in partnership with people living in areas local to Projects.

IWEA Best Practice Guidelines for the Irish Wind Energy Industry 2012

Wind Energy Ireland (WEI), formerly Irish Wind Energy Association (IWEA), published updated Wind Energy Best Practice Guidelines for the Irish Wind Industry in 2012. The guidelines aim to encourage and define best practice development in the wind energy industry, acting as a reference document and guide to the main issues relating to wind energy developments. The purpose of the guidelines is to encourage responsible and sensitive wind farm development, which takes into consideration the concerns of local communities, planners, and other interested groups. The guidelines outline the main aspects of wind energy development with emphasis on responsible and sustainable design and environmental practices, on aspects of development which affect external stakeholders, and on good community engagement practices. In approaching the development of IWEA's guidelines, the aim was to be complementary to the Department of the Environment Heritage and Local Government's '*Wind Energy Development Guidelines'* (2006). The Project has been designed in accordance with the 2012 IWEA Best Practice Guidelines.

IWEA Best Practice Principles in Community Engagement and Community Commitment 2013

Following on from the IWEA published Best Practice Guidelines in March 2012, the Association extended its guidance with the publication of this Best Practice in Community Engagement and Commitment. IWEA and its members support the provision of financial contributions by wind farm operators to local communities and have sought to formulate best practice principles for the provision of a community commitment. The document sets out IWEA's best practice principles for delivering extended benefits to local communities for wind farm developments of 5MW or above. Best Practice Principles of community engagement when planning the engagement strategy and preparing associated literature are also outlined in the document. The aim of these guidelines is to see that the views of local communities are taken into account at all stages of a development and that local communities can share in the benefits. Community engagement was carried out in accordance with the 2013 IWEA Guidelines. Details of the community engagement and financial contributions undertaken by the developer are outlined in **Chapter 1: Introduction (Section 1.10.2)**.

The Draft Revised Wind Energy Development Guidelines (DoHLG, 2019)

The Draft guidelines, provide a roadmap as to how Ireland's 2030 climate commitments can be met and ultimately move the country towards a position of net zero emissions by 2050. The key aspects for the draft proposed new wind energy guidelines include the following:

- a visual amenity setback of 4 times the turbine height between a wind turbine and the nearest residential property, subject to a mandatory minimum distance of 500 metres.
- the elimination of shadow flicker.
- the application of a more stringent noise limit, consistent with World Health Organisation standards.
- the introduction of new obligations in relation to community engagement with local communities along with the provision of community benefit measures.

The Project has been designed in accordance with the current Wind Energy Development Guidelines 2006 and has had regard to the Draft Revised Wind Energy Development Guidelines in relation to:

- Noise impacts (assessed in **Chapter 11: Noise of the EIAR**) are in line with the 2006 guidelines.
- To avoid shadow flicker at nearby dwellings, assessment and mitigation measures have also been included in the project, in line with the 2006 guidelines and with regard to the draft 2019 guidelines, full details of this can be found in **Chapter 5: Population and Human Health** and **Chapter 14: Shadow Flicker of the EIAR**
- Engagement with local communities has taken place throughout the design and planning phases of the Project. Full details can be found in **Chapter 1; Introduction** and in the Community Report in **Appendix 1.5**.
- Community Benefit: Establishing a community fund of up to €250,000 annually in the first 15 years of operation that will be administered by a management committee including local community representatives, in line with the Renewable Energy Support Scheme (RESS) Community Benefit Fund Good Practice Principles published in 2021[25].

The Cork County Development Plan 2022-2028

Although the project is located entirely within the administrative boundary of Limerick County Council, there is potential for visual effects to arise in County Cork given the proximity of the Wind Farm Site to Cork County border. For this reason, policies within the Cork County Development Plan related to landscapes and visual effects on surrounding areas have been taken into consideration in the EIAR.

[25] Government of Ireland. (2021) https://www.gov.ie/en/publication/5f12f-community-projects-and-benefit-funds-ress/ Accessed 07/2/2024

The Cork County Development Plan 2022-2028 sets out the policies and objectives and the overall strategy for the development of the County over the plan period 2022-2028. The CDP states that: "The Plan sets out an approach centred on the core principle of sustainability with a focus on creating vibrant, liveable, climate resilient communities." The policies from the Cork CDP that have the potential to be impacted by the development, with particular relevance to landscape and visual impacts and archaeological landscape impacts have been taken into consideration in Table 4.3. Individual technical assessments included with the EIAR will also refer to CDP policies where relevant.

Table 4.3: Relevant Policies from the Cork County Development Plan (CDP) 2022 - 2028

Cork County Development Plan Objective/Policy	Statement of Compliance
GI 14-9: *(a) Protect the visual and scenic amenities of County Cork's built and natural environment.*	No significant visual impact is predicted in accordance with relevant and national legislation as detailed in the Landscape and Visual Impact Assessment.
GI 14-10: *Ensure that the management of development throughout the County will have regard for the value of the landscape, its character, distinctiveness and sensitivity as recognised in the Cork County Draft Landscape Strategy and its recommendations, in order to minimize the visual and environmental impact of development, particularly in areas designated as High Value Landscapes where higher development standards (layout, design, landscaping, materials used) will be required.*	It is considered that there will not be any landscape, visual and cumulative assessment significant effects arising from the proposed Project.
GI 14-12: *Preserve the character of all important views and prospects, particularly sea views, river or lake views, views of unspoilt mountains, upland or coastal landscapes, views of historical or cultural significance (including buildings and townscapes) and views of natural beauty as recognized in the Draft Landscape Strategy.*	Based on a review of the Cork County Development Plan, there is one scenic designation located within the 20km Study Area. • S13 'Kilfinnane - Shanballymore Road' is located within the southeast periphery of the Study Area, described as 'Local Road from Craig Cross Roads to County

Cork County Development Plan Objective/Policy	Statement of Compliance
	Boundary Views of the Ballyhoura Mountains & the Awbeg Valley'. This scenic route is completely out of ZTV and therefore not deemed relevant to the Project.
GI 14-14: *Protect the character of those views and prospects obtainable from scenic routes and in particular stretches of scenic routes that have very special views and prospects identified in this Plan. The scenic routes identified in this Plan are shown on the scenic amenity maps in the CDP Map Browser and are listed in Volume 2 Heritage and Amenity Chapter 5 Scenic Routes of this Plan.*	Within Co. Cork, there are no designated views and prospects within 15km of the Site. It is considered that there will not be any landscape, visual and cumulative assessment significant effects arising from the proposed Project.

4.8 Flood Risk Assessment

A flood risk assessment (FRA) has been undertaken by HES for the Project. The full FRA report is attached Appendix 10.1 of the EIAR. Identifiable text on local available historical 6" or 25" mapping does not identify any lands that are "liable to flood" in the vicinity area of the Site. The OPW Past Flood Events Map (www.floodinfo.ie) records the occurrence of 2 no. historic and 1 no. recurring flood instances in the vicinity of the Site. The mapped flood events all occur at the same location along the N20 National Road on the western side of the Site. The historic flood events include the fluvial flood events at Maigue Creggane Bridge in August 1986 (Flood ID-205) and November 1982 (Flood ID-503). A recutting flood event is also mapped at this location (Flood ID-747). The Kilmallock Area Engineer's Report, available to view at www.floodinfo.ie, notes that "the road is rendered impassable and major traffic chaos is caused on average once every 5 years."

The GSI Winter 2015/2016 Surface Water Flood Map (www.floodinfo.ie) shows surface water flood extents for this winter flood event. This flood event is recognised as being the largest flood event on record in many areas across the country. The flood map for this event records localised areas of surface water flooding to the west of the Site. No infrastructure is proposed in these areas. CFRAM fluvial mapping has been completed for the area of the Wind Farm Site (EIAR Figure 10.4). CFRAM River Flood Extents for the Present-Day scenario are

mapped extensively along the River Maigue and its tributaries in the vicinity of the Site. CFRAM River Flood extents cover large areas of the Site. In terms of the Project infrastructure, a total of 5 no. turbines are mapped within CFRAM fluvial flood zones. T5 and T8 are mapped in the low probability flood zone associated with the 1 in 1,000-year fluvial flood event. Meanwhile, T4, T6 and T7 are mapped in the high probability fluvial flood event associated with the 1 in 100-year flood event.

There are no National Indicative Fluvial Mapping (NIFM) for the Present-Day Scenario mapped within the Site. NIFM flood zones are mapped immediately upstream and to the west of the Site along the River Maigue.

The Site is mapped as Benefited Land, associated with an Arterial Drainage Scheme (ADS). Benefited land is land that was drained as part of a scheme. All watercourses in the vicinity of the Site are mapped as ADS channels and are maintained by the OPW, with periodic dredging being completed as a control measure for flooding.

A Stage III level site-specific FRA was carried out for the Site to assess the capacity and design flood levels of the river channel network (River Maigue and its tributaries). In the base modelled scenario, the modelled flood zone mapping is very similar to the flood mapping included in www.floodinfo.ie. Proposed turbines T4, T5, T6, T7, and are inundated by flood water in the 100-yr and 1000-yr DFs (design flood (DF) events). The modelled flood level for the 100-year flow (1% AEP) for the Site ranges between 57.09mOD at the northern downstream end, approximately 57.5mOD in the central area of the Site (i.e. where the 3 reaches join/confluence) and 57.98 at the southern end of the Site. The modelled flood level for the 1000-year flow (0.1% AEP) for the Site ranges between 57.28mOD at the northern downstream end, 57.66 mOD in the central area of the Site and 58.0mOD at the southern end of the Site. The 1,000-year level is approximately 0.17m higher than the 100-year level.

Within the FRA a Justification Test has been completed for the proposed wind farm infrastructure within the mapped fluvial flood zones (i.e. T4, T5, T6, T7 and T8, and associated hardstand and Access Tracks). Flood resilience measures have been proposed which include the reinstatement of the turbine hardstand within the floodplain to reduce the area of less permeable surfaces within the flood zone, the reduced area operational hardstands and Access Tracks will be set at the 1 in 20-year flood level, the placement of sensitive electrical components and transformers well above flood levels. Refer to Section 10.6.1.3 for a full description of the flood resilience proposals.

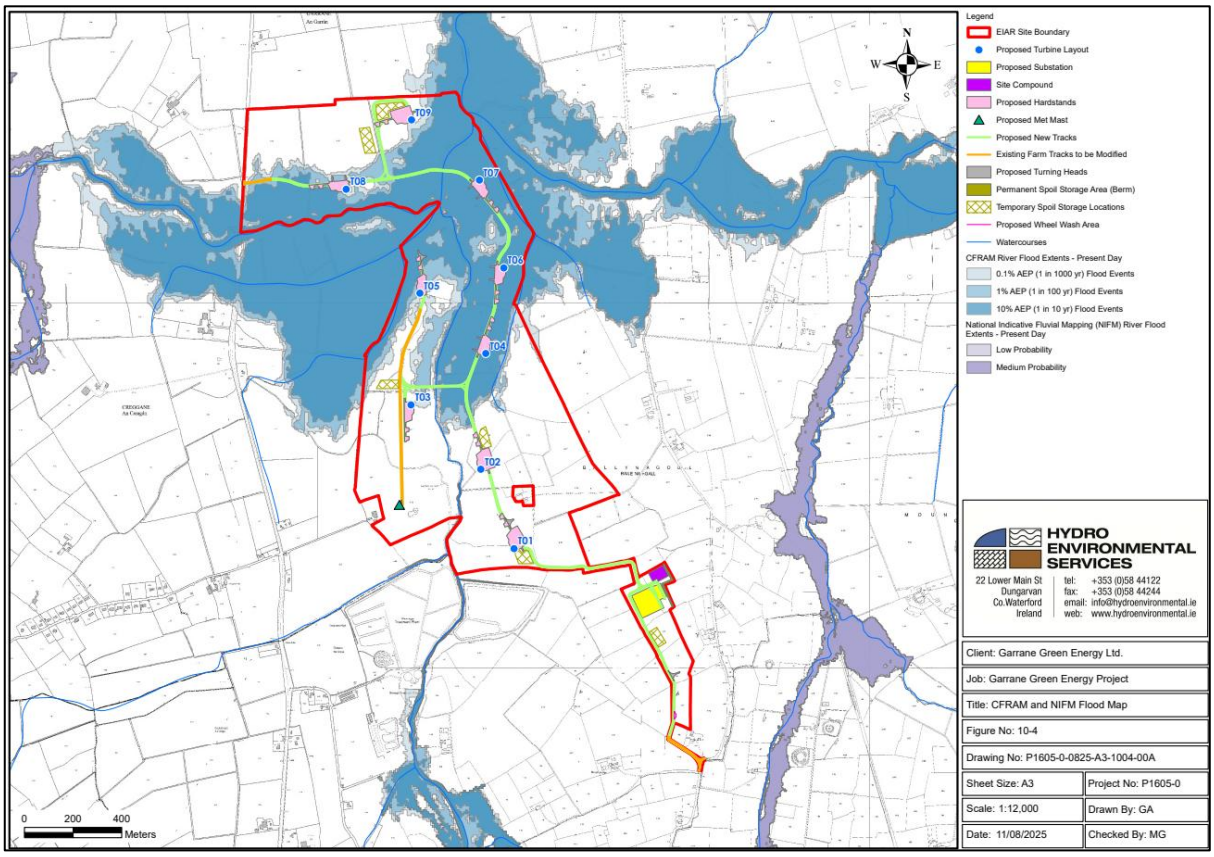


Figure 4.1: CFRAM and NIFM Flood Map

The main conclusion of the SSFRA is that the Project can be implemented, and while there is a loss of floodplain storage, that loss does not have the potential to significantly increase upstream or downstream flood risk; and,

This is important as it confirms that there is no potential to alter existing or future downstream flood risk at Croom AFA and Adare AFA (OPW, 2018).

There is also precedent for the construction of wind farm within floodzones. Cushaling Wind Farm is nine turbine wind farm under construction in Co. Offaly (PL19.306924) and Borris Beg a nine turbine wind farm that was granted permission in September 2024 (ABP-318704-23).

5. MATERIAL PLANNING CONSIDERATIONS

The planning application should be considered on the basis of the proper planning and sustainable development of the area and on the likely effects of the Project on the environment. The EIAR concluded that the Project will have no significant effects on population and human health, biodiversity, aquatic ecology, soils and geology, hydrology

and hydrogeology, noise and vibration, landscape and visuals, air quality and climate, archaeology and cultural heritage, material assets and traffic and Transport.

On the basis of the assessment set out in the NIS, it is respectfully submitted that the competent authority will be in a position to determine that no reasonable scientific doubt remains, that the Proposed Project will not adversely affect the integrity of any European site, in view of the conservation objectives of that site.

5.1 The National Interest and Strategic Importance

The project will make a valuable contribution to climate change adaptation and greenhouse gas reductions as part of the international and European efforts to combat climate change.

Ireland is facing significant challenges in efforts to meet renewable energy and emissions targets and is falling behind in the longer-term movement away from fossil fuels. Ireland has one of the highest rates of importing fuel in Europe with energy import dependency increasing to 80% in 2021. Energy demand in Ireland has been growing and is expected to continue to increase, especially electricity demand which is expected to grow by 37% to 2031. Increases to the cost of carbon, supply issues and potential political insecurity increases fossil fuel price volatility. Since the Russian invasion of Ukraine, energy prices in Ireland have increased significantly. The SEAI's Electricity Prices in Ireland Report; January to June 2022, found on average residential electricity prices increased 10.4% in the 12 months prior to June 2022. The Economic and Social Research Institute (ESRI) report on Energy Poverty published in 2022, has also warned that as many as 43% of households could now be in energy poverty.

The high rate of imported fossil fuel dependency, the increasing demand for electricity and current energy price volatility make it vital to introduce more domestic renewable energy generation plants, such as the Project, to provide reliable, secure and affordable energy supplies in Ireland. The project could improve Irish energy security and reduce reliance on imported fossil fuels in line with the National Energy Security Framework and the REPowerEU Plan.

The construction of the project will also positively contribute to the regional economy bringing investment and jobs that will help to support and retain confidence in the key regional industries of construction and renewable energy.

5.2 Importance of the Project

The Project would represent a strategically significant investment in the locality of County Limerick and the wider southern region. The Project will provide a significant economic benefit to both the Irish and local economies. The Project provides the opportunity to reinforce the existing local renewable energy industry knowledge and skills base, providing the stability and diversity to the rural economy that can stimulate further industry investment to take place.

The influence of the Project on the de-carbonisation of the electricity network will contribute positively to an issue of strategic social importance. This is illustrated by the text of the Irish government's recent Climate Action Plan 2024 which sets an ambitious 80% target for electricity production from renewable sources by 2030 and highlights the need to remove barriers to the development of renewables, including onshore wind, such as streamlining regulation and encouraging reinforcement of the grid to facilitate greater renewables penetration. The significance of the action plan is underlined by the Irish government's 2019 declaration of a climate emergency.

The RSES recognises and aims to support the many opportunities for wind as a major source of renewable energy. It declares that opportunities for both commercial and community wind energy projects should be harnessed, having regard to the requirements of the 2006 DoHPLG Guidelines on Wind Energy.

As a form of sustainable energy, and with an anticipated output of 54MW, the Project will contribute to the renewable energy targets in County Limerick and in the Southern Regional Assembly Area.

The Project will be a significant regional project providing a sizeable economic benefit through local investment, employment, local authority rates, and a local community benefit funds in accordance with Government, regional and local planning policies.

Wind Energy Ireland produced a report on The Economic Impact of Onshore Wind in Ireland[26] which illustrated that the onshore wind industry in 2020 supported over 5000 jobs and by 2030 there is a potential to increase this to over 7000, as shown **in Figure 4.2** The report also outlines the current benefits of onshore wind along with how far Ireland has to

[26] WEI. (2021). The Economic Impact of Onshore Wind in Ireland https://windenergyireland.com/images/files/economic-impact-of-onshore-wind-in-ireland.pdf Accessed 01/11/2024

go to reach binding targets. Note that the installed capacity needs to nearly double within a ten year period.

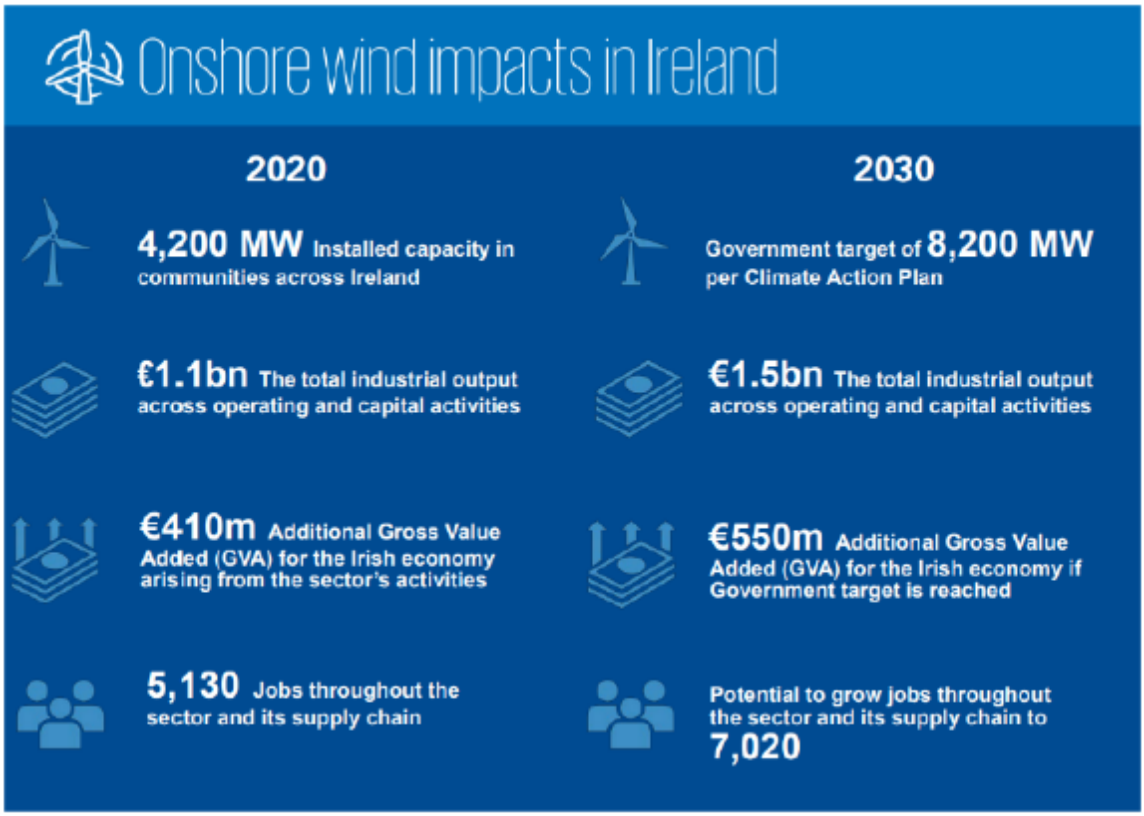


Figure 4.2: Onshore Wind Impacts in Ireland (from the Economic Impact of Onshore Wind in Ireland Figure 1.6)

The construction of the Project will positively contribute to the regional economy bringing investment and jobs that will help to support and retain confidence in the key regional industries of construction and renewable energy.

The Project will make a valuable contribution to climate change adaptation and greenhouse gas reductions as part of the international and European efforts to combat climate change.

Ireland is facing significant challenges in efforts to meet renewable energy and emissions targets and is falling behind in the longer-term movement away from fossil fuels. Ireland has one of the highest rates of importing fuel in Europe with energy import dependency increasing to 80% in 2021[27]. Energy demand in Ireland has been growing and is expected to continue to increase, especially electricity demand which is expected to grow by 37% to

[27] SEAI. (2022). ENERGY IN IRELAND. https://www.seai.ie/data-and-insights/seai-statistics/key-publications/energy-in-ireland/?gclid=EAIaIQobChMI-LH_o6r8_QIV09_tCh23YAykEAAYASAAEgJipvD_BwE Accessed 07/01/2024

2031[28]. Increases to the cost of carbon, supply issues and potential political insecurity increases fossil fuel price volatility. Since the Russian invasion of Ukraine, energy prices in Ireland have increased significantly. The SEAI's Electricity Prices in Ireland Report; January to June 2022[29], found on average residential electricity prices increased 10.4% in the 12 months prior to June 2022. The Economic and Social Research Institute (ESRI) report on Energy Poverty published in 2022[30], has also warned that as many as 43% of households could now be in energy poverty.

The high rate of imported fossil fuel dependency, the increasing demand for electricity and current energy price volatility make it vital to introduce more domestic renewable energy generation plants, such as the Project, to provide reliable, secure and affordable energy supplies in Ireland. The Project could improve Irish energy security and reduce reliance on imported fossil fuels in line with the National Energy Security Framework (4.6.3.2) and the REPowerEU Plan (Section 4.5.3).

The construction of the Project will also positively contribute to the regional economy bringing investment and jobs that will help to support and retain confidence in the key regional industries of construction and renewable energy.

5.3 Project as Sustainable Development

The Project is an example of sustainable development, enshrined in the National Planning Framework First Revision. Sustainable Development is development which meets the needs of the present without compromising the ability of future generations to meet their own needs, as outlined in the Brundtland Report. There are three facets to sustainable development which are economic, social and environmental as defined by the UN Sustainable Development Agenda. The Project meets each of the three facets of sustainable development as laid out in **Table 5.1**.

[28] EirGrid. (2022). EirGrid's Generation Capacity Statement Predicts Challenging Outlook for Ireland https://www.eirgridgroup.com/newsroom/eirgrids-generation-capac/#:~:text=The%20GCS%2C%20in%20its%20median,relatively%20consistent%20across%20the%20decade. Accessed 07/01/2024

[29] SEAI. (2022). https://www.seai.ie/publications/SEAIs-EPR-data-for-JAN-to-JUN-2022.pdf Accessed 07/02/2024

[30] ESRI. (2022). Energy poverty at highest recorded rate https://www.esri.ie/news/energy-poverty-at-highest-recorded-rate Accessed 07/01/2024

Table 5.1: The Project as Sustainable Development

Economic Role	The Project provides the opportunity to reinforce the existing local renewable energy industry knowledge and skills base by providing new jobs in the industry, providing the stability and diversity to the rural economy that can stimulate further development by attracting new business to the region due to the improved supply of electricity, enabling diversification. The Project will have a positive economic impact with several Irish firms commissioned to work on the design, environmental assessment and planning. The construction and operational phases will also create jobs locally and nationally and will lead to further economic development. The Project represents a strategically significant investment in the locality.
Social Role	The influence of the Project to the de-carbonisation of the Irish electricity network will contribute positively to issues of strategic social importance. It will assist in mitigating climate change and improve air quality while enhancing energy security, including helping to stabilise and reduce energy costs. The Project will also create jobs up to 60 direct and indirect jobs during the construction periods. The Project will also promote economic development and rural diversification. Garrane Green Energy Limited will set up a community benefit fund which will allocate funds from the wind farm to community groups in the area should the wind farm be granted planning and be successful under the Government's Renewable Electricity Support Scheme (RESS) support programme. Further details can be found in **Chapter 1: Introduction** and **Appendix 1.5**. The impact of the Project to the de-carbonisation of the Irish electricity network is a positive contribution to an issue of strategic social importance. This is illustrated by the Climate Action Plan 2024 which sets an 80% target for electricity production from renewable sources by 2030 and highlights the need to remove barriers to the development of renewables, including onshore wind, such as streamlining regulation and encouraging reinforcement of the grid to facilitate greater renewables penetration. The significance of the

	action plan is further underlined by the Irish government's recent declaration of a climate emergency. The deployment of modern, efficient wind turbine technology, which is currently the cheapest form of new generation, will also contribute to reducing the cost of energy and benefit Irish consumers through lower energy prices. The Project has the potential to bring significant positive benefits to local communities. It will support sustainable local employment; it will contribute annual rates to the local authority; and it will provide opportunity for local community investment in the project in line with the new Renewable Energy Support Scheme (RESS). This is a Government of Ireland initiative that provides support to renewable energy projects in Ireland. A Community Benefit Fund will be put in place for the RESS period (i.e., 15 years of the operation) of the Project to provide direct funding to those areas surrounding the Project. The significant annual community benefit fund will be established in line with Government policy which will include funding for both wider community initiatives and a Near Neighbour scheme focused on houses in close proximity to the Project. The additional renewable energy that the Project will generate will help support Ireland's wider low carbon transition. It will help to meet the additional electrical demand that will be created by the electrification of the transport and heating networks and the growing tech industry installations such as data centres.
Environmental Role	The Project has been assessed in terms of its impact on the environment, where impacts have been identified, the design has been amended and mitigation implemented to avoid, prevent and reduce adverse impacts and maximise positive impacts. Approximately 46,689 tonnes of carbon dioxide will be displaced per annum by the Project. This helps to mitigate climate change and will have a positive impact on the environment. Over its' lifespan (35 years), the Project would displace 1,634,117 tonnes of CO2. This

	would help to mitigate climate change and the impacts to ecosystem globally. Overall, the EIAR sets out that the environmental effects arising from the Project can be satisfactorily mitigated. The findings demonstrate that the environment can accommodate the Project without giving rise to significant environmental impacts in line with the LDP 2022 - 2028 objectives as well as regional, national and international policy. The NIS concludes that the proposed Project, either alone or in combination with other plans and projects, would not adversely affect the integrity of European sites, in view of the sites' conservation objectives and there is no reasonable scientific doubt as to the absence of such effects.

The Project has been conceived and designed to align within the planning and sustainable development objectives of the local area. The success of this is documented in comprehensive detail through the EIAR. and illustrated in **Table 5.1** which shows compliance with the provisions of the Limerick County Development Plan.

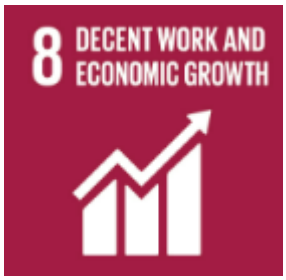
The planning application shows that the Project provides an excellent opportunity to stimulate continued and additional investment to maximise beneficial impact towards national targets, while also minimising the resulting environmental effects.

The 2030 Agenda for sustainable development, adopted by all United Nations Member States in 2015, provides a shared blueprint for peace and prosperity for people and the planet, now and into the future. At its heart are the 17 Sustainable Development Goals (SDGs), which are an urgent call for action by all countries - developed and developing - in a global partnership. The UN SDGs are the blueprint to achieve a better and more sustainable future for all. They address the global challenges we face, including poverty, inequality, climate change, environmental degradation, peace and justice.

The Project positively contributes to the following UN SDGs:

By producing renewable energy, the Project contributes to the displacement of fossil fuels, which pollute the air, this improves air quality, which is closely linked to good health and well-being. See **Chapter 13: Air and Climate** of the EIAR for details.

The Project would produce a renewable energy source locally, this improves Ireland's energy security and helps to stabilise and reduce energy costs for households and businesses.



The Project is a renewable energy enterprise, representing a multi-million-euro investment into the Southern Region. This could attract new enterprise to the county, bringing jobs and economic growth. This is examined in more detail in **Chapter 5: Population and Human Health of the EIAR**

The Project by producing renewable energy contributes to decarbonising industry sectors through electrification. The Substation and Grid Connection will become assets of the national electricity grid under the management of EirGrid and assist in improving energy infrastructure in the region.

The renewable energy that the Project will generate will help support Ireland's low carbon transition and reduce anthropogenic greenhouse gases. The proposed Project could provide power for to up to 12,000 homes with renewable energy.

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By generating renewable energy and displacing fossil fuels the Project helps to reduce carbon emissions and other greenhouse gases and mitigate climate change, supporting Ireland's transition to competitive, carbon neutral, climate-resilient and environmentally sustainable economy by 2050.

6. CONCLUSION

Throughout this Planning Statement, renewable energy is identified as being required to play a vital role in mitigating climate change by transitioning to a carbon neutral economy and society. By investing in renewable energy, Ireland can promote sustainable economic development using its own, secure and clean energy.

All planning applications have to be determined on their individual merits with due consideration given to the overall planning balance of a scheme. The pressing need to address climate change, the challenges to energy security giving rise to the adoption of RED III and the renewable energy policy adopted at a European, national, regional and local level, provides strong policy support for renewable energy development. The Project contributes to supplying the national demand for renewable energy, which in the context of the ongoing climate emergency is an urgent Irish national priority.

Furthermore, pursuant to section 15 of the Climate Act, the Commission is obliged, in so far as is practicable to perform its function in a manner consistent with CAP 2025, the National Energy & Climate Plan 2021 – 2030 and other listed national climate mitigation and adaptation plans. The recent High Court decision in the Coolglass case confirmed the imperative nature of the obligation placed on public bodies to exercise their discretionary powers in "such a way as to support the outcome favouring climate goals"31 unless precluded by a "mandatory and non-fixable legal requirement" (which it is submitted is not the case here).

The Garrane Green Energy Project in County Limerick will provide 54MW of renewable, domestically produced wind energy. This additional renewable power generated will contribute to a reduction in greenhouse gas emissions from fossil fuels, improve regional/national energy security and help Ireland achieve our renewable electricity targets.

[31] Coolglass Wind Farm Limited v An Bord Pleanála [2025] IEHC 1 at para. 131

The Project contributes to supplying the national demand for renewable energy, which in the context of the ongoing climate emergency and increasing demand is an urgent Irish national priority.

While renewable energy in Ireland has come a long way, there is still a shortfall in where the nation needs to be to achieve increasing targets. Ireland missed its 2020 target for renewable energy achieving 12% instead of 16% of overall renewable energy share. There is a clear national mandate to accommodate significant onshore wind within the next decade with the Climate Action Plan 2024 setting a 9GW target for installed wind energy capacity by 2030. In December 2024 this was 4.8GW in the Republic of Ireland, leaving a shortfall of 4.2GW to be achieved over the next 5 years.

Further, the National Planning Framework emphasises a move to a low-carbon economy, reducing Ireland's carbon footprint and integrating climate action into the planning system. The Regional Spatial and Economic Strategy (RSES) for the Southern Region supports opportunities for onshore wind as a major source of renewable energy with an important role in delivering value and clean electricity for Ireland. The Limerick Development Plan 2022 - 2028 reinforces the national and regional energy policies. The Project falls in an area classed as *'Preferred Area'* for wind farm development in the Renewable Energy Strategy for Co. Limerick.

The Project meets the definition of sustainable development as defined by the National Planning Framework in terms of the three sustainability pillars: Economy, Environment and Social. It also contributes to the UN sustainability goals; 3 Good Health and Wellbeing, 7 Affordable and Clean Energy, 8 Decent Work and Economic Growth, 9 Industry Innovation and Infrastructure, 11 Sustainable Cities and Communities and 13 Climate Action.

The Project process adopted by the Developer has represented a best practice approach to a renewable energy scheme design, minimising the potential impact through multiple design iterations and modifications to minimise the impact on the receiving environment, as shown in **Chapter 3: Alternatives of the EIAR.** This ensures compliance with the suite of planning policies and objectives of the LDP 2022 - 2028. The layout of the Project presented in the Planning Application and EIAR represents the optimum fit with the technical and environmental parameters of this Project.

Environmental Impacts have been considered within this EIAR and through the process of assessment, embedded mitigation, and additional proposed mitigation outlined in the EIAR,

NIS, CEMP and Biodiversity Enhancement and Management Plan, it has been shown that the Project can be constructed and operated and decommissioned without likely significant effects arising, demonstrating the acceptability of the proposal.

The Project is compliant with International, European and National policy on energy security, emissions reductions and renewable energy production. It has reviewed policy for the Southern region and local County Limerick policies and finds the Project complies with key renewable energy and environmental policy objectives.

The Project is aligned to all the relevant planning policies identified throughout this chapter, and it will contribute to achieving renewable energy and reduction in emissions targets locally, regionally and nationally as outlined in section 4.6 of this chapter.

The Project also meets the UN's definition of Sustainable Development in terms of the three sustainability pillars; Economy, Environment and Social.

This Planning Statement outlines how the Project is compliant with International, European and National policy on energy security, emissions reductions and renewable energy production. It reviews policy for the Southern region and Limerick County policies and finds that the Project complies with key renewable energy, landscape and environmental policy objectives. In this regard, the Project:

The development process adopted by the Applicant has represented a best practice approach to a renewable energy scheme design, minimising the potential impact on the receiving environment through multiple design iterations. The proposed layout represents the optimum fit with the technical and environmental parameters of this project and this site. Furthermore, the embedded mitigation, mitigation by avoidance and reduction and compensation through management and restoration of degraded habitats as outlined in the EIAR, CEMP and Biodiversity Enhancement Management Plan are considered to adequately mitigate the predicted environmental effects.

Overall, it is considered that the Project aligns with international, European, national and local policy.

6.1 Public Consultation Informing the Public and Local Residents

The public were informed about the project via a newsletter which was issued in April 2025 newsletter outlined who Greensource are, project proposals, project schedule, community

benefit, the proposed EIA process and studies to be undertaken, answers to frequently asked questions and contacts for further information requests and questions. The Community Engagement Report is attached as **Appendix 1.5** of the EIAR. Garrane Green Energy Limited will set up a community benefit fund which will allocate funds from the wind farm to community groups in the area should the wind farm be granted planning and be successful under the Government's Renewable Electricity Support Scheme (RESS) support programme.

If consented, the Project will require an approximate investment of circa €65-70 million and will provide sustainable, low carbon energy generation infrastructure to meet Ireland's growing demand. The Project benefits to the local community would include significant investment in local infrastructure and electrical systems, local job creation, and a contribution of approximately €15.1million[32] in Limerick County Council rates over the project operational lifetime of 35 years.

If consented and successful under the RESS Support programme, the Project will also provide a community fund calculated in accordance with the RESS Terms and Conditions at €2 per MWh of electricity produced by the Project. This is to be made available to the local community for the duration of the RESS (15 years). In line with the Community Benefit Fund Guidelines, governed by the Sustainable Energy Authority of Ireland (SEAI), and based on the current Project scope, Garrane Green Energy will generate a Community Benefit Fund estimated at over €3.7 million over the first 15 years of operation. This amounts to approximately €250,000 per annum. The actual fund will vary around this average from year to year, depending on each year's wind conditions. Improvement in wind turbine technology and site wind resource estimates indicate that the Project could be capable of achieving an above average capacity factor and therefore contribute towards a larger community fund.

[32] Estimated €8,000 per mega watt installed for 35 year project lifespan