



Planning Statement

Balinlee Wind Farm

Ballinlee Green Energy Ltd.

September 2025

Contents

1.	Introduction	1
2.	Application Site	3
2.1	The Site and Environs	3
2.2	Planning History	5
2.3	Designation	5
3.	Description of the Proposed Development.....	7
3.1	Wind Farm Substation	9
3.2	Grid Connection Route	10
3.3	Turbine Delivery Route (TDR).....	11
4.	Planning Policy Context	13
4.1	International Policy.....	13
4.1.1	The Renewable Energy Directive.....	13
4.1.2	REPower EU Plan	14
4.2	National Policy	15
4.2.1	Revised National Planning Framework	15
4.2.2	Policy Statement on Energy Security in Ireland to 2030.....	17
4.2.3	Climate Action Plan 2025.....	17
4.2.4	Climate Action and Low Carbon Development Act 2015 (as amended in 2021).....	18
4.2.5	Planning Guidelines for Wind Energy (DoEHLG 2006)	20
4.2.6	Draft Revised Wind Energy Guidelines (DoHPLG, Dec 2019).....	20
4.2.7	Best Practice Guidelines for the Wind Energy Industry (IWEA 2012)	20
4.3	Regional Planning Policy.....	21
4.3.1	Southern Regional Assembly- Regional Spatial and Economic Strategy (RSES).....	21
4.4	Local Policy	21
4.4.1	Limerick City and County Development Plan 2022-2028	21
5.	Planning Assessment	24
5.1	Principle of Development.....	24
5.2	Design and Layout.....	24
5.3	Environmental Impact Assessment Report (EIAR)	24
5.4	Residential Amenity	25
5.5	Cultural Heritage	26
5.6	Appropriate Assessment (AA) Screening Report and Natura Impact Assessment (NIS).....	27
5.7	Landscape.....	27

6. Conclusion 30

Figures

Figure 2-1 Site Location Map 3

Figure 2-3 Proposed Wind Farm Site 4

Figure 2-4 Proposed Grid Connection Route to existing 220/110kV Killonan Substation 5

Figure 2-5 Wind Energy Zoning within Limerick City and County Development Plan (2022-2028) 6

Figure 3-1 Proposed Wind Farm Site Layout 8

Figure 3-2 Typical turbine foundation detail 9

Figure 3-3 Proposed Substation Compound 10

Figure 3-4 Proposed Grid Connection Route 11

Figure 3-5 Proposed Turbine Delivery Route 12

Figure 4-1 Extract from National Planning Framework 17

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1. Introduction

This Planning Statement has been prepared by Malachy Walsh and Partners (MWP), on behalf of Ballinlee Green Energy Ltd. (The Applicant), to accompany a Strategic Infrastructure Development (SID) planning application for a proposed Wind Energy project within the townlands of Ballincurra, Ballingayrou, Ballinlee South, Ballinlee North, Ballinrea, Ballyreesode, Camas North, Camas South, Carrigeen, Knockuregare, Ballybane, Ballynanty, Cahirguillamore, Rockbarton, Grange, Ballynagallagh, Skool, Friarstown South, Friarstown, Rockstown, Rochestown, Carriganattin, Stonepark, Ballynagarde, Ballymacgreese, Glen, Knockbrien, Ballyneety, Scart, Ballyogartha, Carrigmartin, Cahernarry (Cripps), Drombanny, Ballybrennan, Coolyhenan, Knockananty, Ballysimon Commons, Tullovin and Milltown, Co. Limerick.

The main components of the proposed development include:

- The Wind Farm Site which includes seventeen (17) wind turbines, associated tracks and infrastructure, an onsite 110kV electrical substation and a Grid Connection Route (GCR) which consists of an underground electrical grid connection from the Wind Farm Site to the existing Killonan 220/110kV Substation.
- A Turbine Delivery Route (TDR) which is the route between the Port of Foynes and the Wind Farm Site along which turbine components will be transported. This will include temporary accommodation works along the public road to allow for the delivery of wind turbine components.

MWP commenced pre-application consultations with An Coimisiún Pleanála in August 2024 and a pre-application meeting was held on the 25th of October 2024. A second meeting was held on the 20th of March 2025. On the 27th June 2025, An Coimisiún Pleanála concluded the pre-application process and issued its opinion that the proposed development would be Strategic Infrastructure and that an application for approval should be made to them under 37E of the Planning and Development Act 2000, as amended.

This statement provides a concise overview of the planning merits of the proposed development. The purpose of this planning statement is to provide details which will assist An Coimisiún Pleanála in determining whether the proposed development is in accordance with the proper planning and sustainable development of the area, and accordingly whether planning permission should be granted for the proposed development. The statement is set out as follows:

- **Section 2: Application Site** - This section provides a description of the site, its context, and the relevant planning history.
- **Section 3: Description of Proposed Development** - This section describes the proposal.
- **Section 4: Planning Policy Context** – This section outlines the national, regional and local planning policies relevant to the application site and proposed development.
- **Section 5: Planning Assessment** – This section provides an assessment of the principle of development and other relevant considerations.
- **Section 6: Conclusion** - This section summarises the key points set out in the report.

This Planning Statement comprises part of a suite of application documents, which also includes an Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS). All documents should be read in conjunction, in order to have a full understanding of the nature, location and extent of the proposed development.

This Planning Statement accompanies a planning application for a wind farm development submitted under the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. 274 of 2025) as amended by S.I. 426 of 2025, which transposes key provisions of the Renewable Energy Directive III (Directive EU 2023/2413) into Irish planning law.

2. Application Site

2.1 The Site and Environs

The proposed development is located in a rural area of east Limerick approximately 18km south of Limerick City and 3km southwest of Bruff. **Figure 2-1** outlines the location of the proposed development and indicates the proposed wind farm development site boundary included in the planning application. The area within this boundary is approximately 255ha.

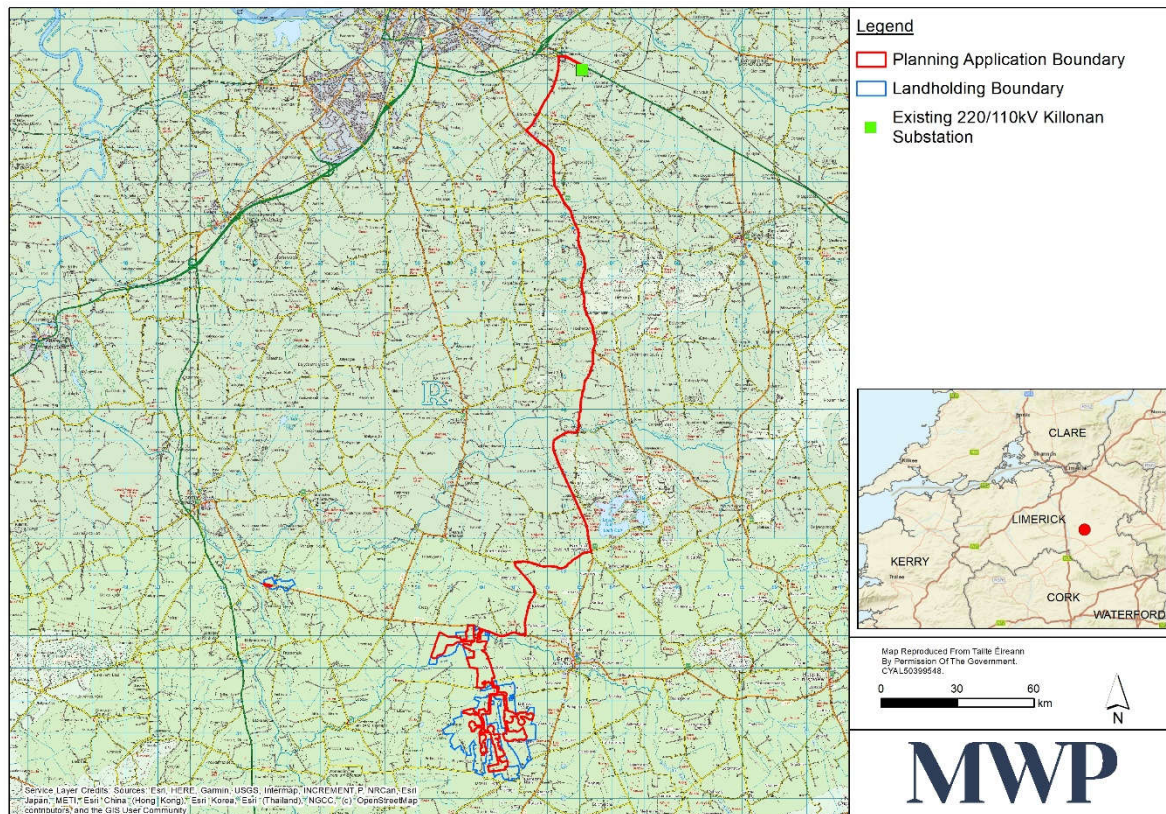


Figure 2-1 Site Location Map

The wind farm site is located on privately-owned predominantly agricultural lands within the townlands of Ballincurra, Ballinlee South, Ballingayrou, Ballinrea, Knockuregare, Ballinlee North, Carrigeen and Camas South approximately 18km southeast of Limerick City and 3km southwest of Bruff, Co. Limerick. The site is situated in a rural area characterised by agricultural holdings and one-off residential dwellings. Some patches of forestry plantation occur within the proposed development and some on neighbouring properties.

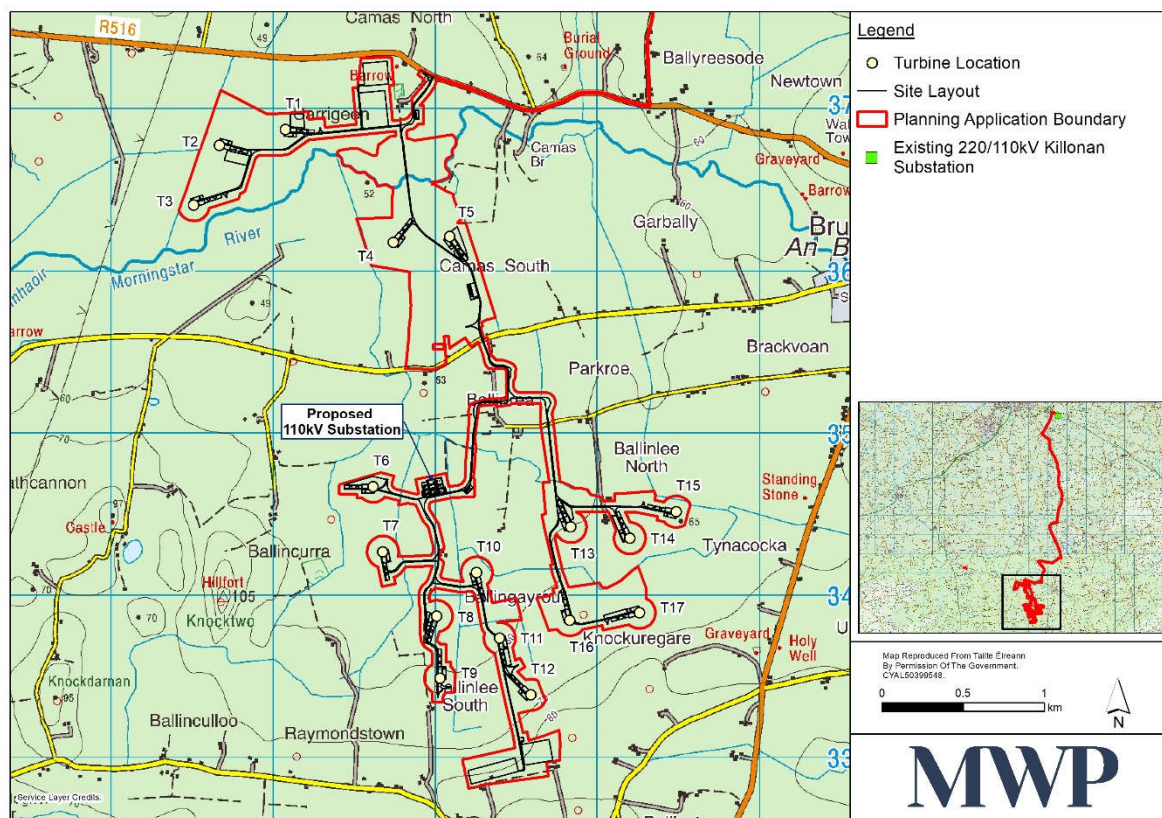


Figure 2-2 Proposed Wind Farm Site

The proposed grid route under consideration is approximately 27.6km extending from the existing Killonan 220/110kV Substation to the proposed onsite 110kV substation at the Wind Farm site. The proposed route is located along road networks within the townlands of Milltown, Ballysimon Commons, Coolyhenan, Knockananty, Ballybrennan, Drombanny, Carrigmartin, Cahernarry (Cripps), Scart, Ballyogartha, Ballyneety, Knockbrien, Glen, Ballymacreese, Ballynagarde, Stonepark, Carriganattin, Rochestown, Friarstown, Rockstown, Skool, Friarstown South, Grange, Ballynagallagh, Rockbarton, Cahirguillamore, Ballynanty, Ballybane, Ballyreesode, and Camas North.

To facilitate the turbine delivery a new temporary access track is proposed on privately-owned predominantly agricultural lands within the townland of Tullovin approximately 3.3km southeast of Croom, Co. Limerick.

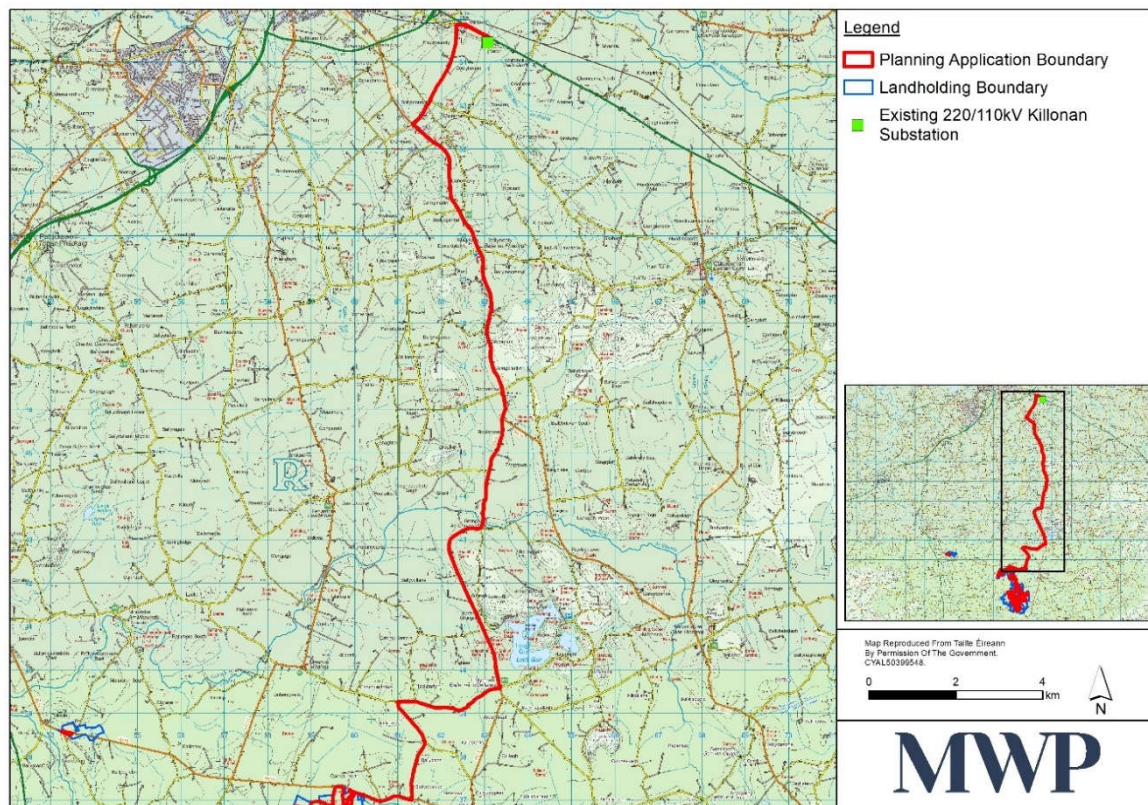


Figure 2-3 Proposed Grid Connection Route to existing 220/110kV Killonan Substation

2.2 Planning History

The planning history of the proposed site has been reviewed on the online planning records of Limerick City and County Council (Council) and it was found that there have not been any planning applications to date made within the planning application boundary.

2.3 Designation

The Limerick City and County Development Plan (2022-2028) identifies the optimum locations for wind energy developments in the county having regard to environmental and geographical constraints and the protection of the amenities of local residents as outlined in **Figure 2-4**. There are three wind energy designations within the County and these designations are as follows:

- Preferred Areas
- Areas Open for Consideration
- Areas Unsuitable

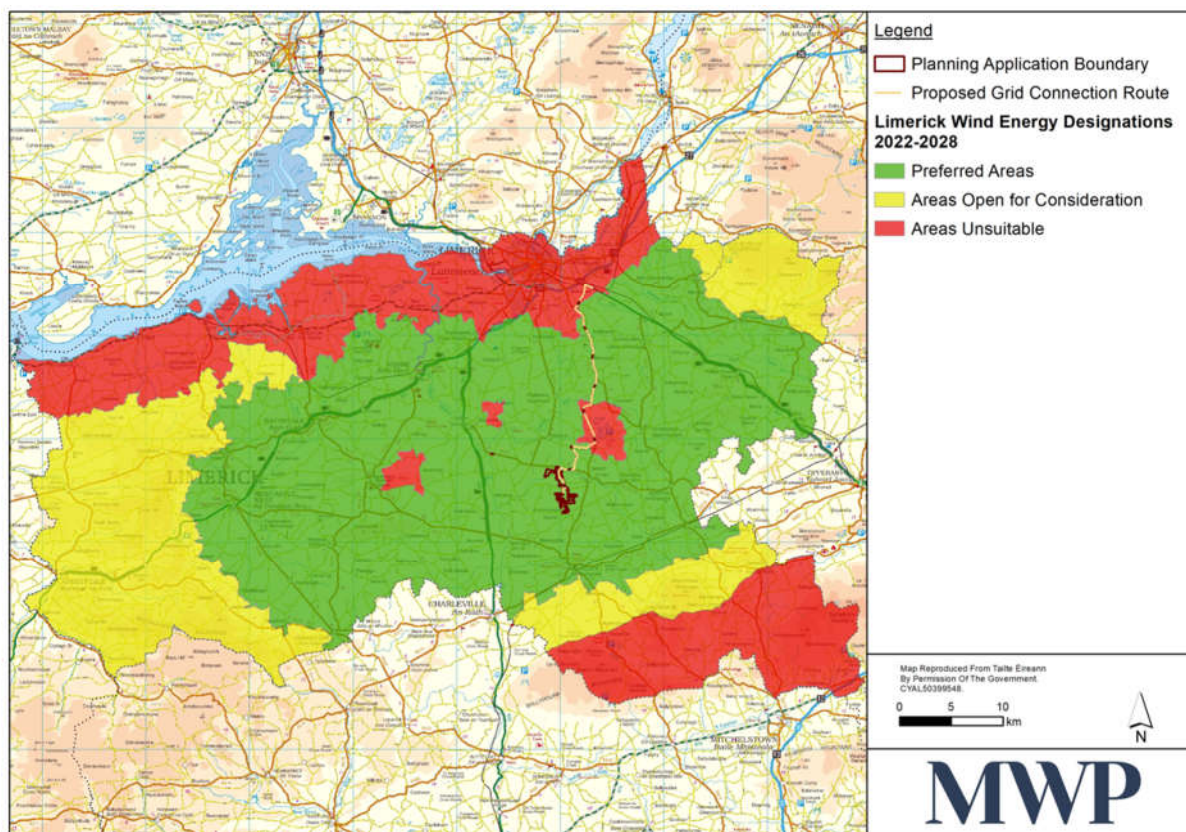


Figure 2-4 Wind Energy Zoning within Limerick City and County Development Plan (2022-2028)

The proposed Wind Farm Site is ideally located within an area designated as being a 'Preferred Area' for wind Energy developments. The following objective highlights that the Council shall promote wind energy developments within the preferred area designation:

Objective CAF O30 *Location of Wind Energy Developments; 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'.*

A minor section of the Grid Connection Route (GCR) lies within an area designated as being "unsuitable for new wind energy development". The GCR is considered to be an electricity transmission development as opposed to a wind energy development and therefore this designation does not apply. The GCR is underground and therefore, there will be no impact on the surrounding environment once operational.

3. Description of the Proposed Development

The development for which planning permission is sought in the planning application (the proposed development) consists of the following:

Table 3-1: Characteristics of the Proposed Development

Proposed Development for which consent is sought	Core Wind Farm Components - Seventeen (17) No. wind turbines (turbine tip height of 160m, and 150m (T6 only)) with associated foundations and crane hardstand areas. - One (1) No. Permanent Meteorological Mast (92m height) and associated foundation, hardstand area and ancillary main crane hardstand area. - One (1) No. Electrical Substation (110kV) including Eirgrid compound, IPP, maintenance compounds, ancillary building, security fencing and all associated works. - Nine (9) No. site entrances. - New and upgraded internal site service tracks (approximately 10.8km of new internal access tracks to be constructed). - New clear span bridge over the Morningstar River. - Underground electric collector cable systems between turbines within the wind farm site. - Underground electric cabling systems between the wind farm site and connection point at existing Killonan 220/110kV substation. Associated Components of the Proposed Development - New temporary access track via R516 to facilitate turbine delivery route located in the townland of Tullovin. - Three (3) No. temporary construction site compounds (one approximately 95m x 50m and two approximately 55m x 25m). - Two (2) No. borrow pits to be used as a source of stone material during construction and for storage of excess excavated materials. - Nine (9) No. permanent and two (2) temporary deposition areas. - Associated surface water management systems. - Tree felling required for wind farm infrastructure.
Other Associated Project Components	- Whooper Swan Management Area works - Habitat Enhancement Areas works - Landscaping, fencing and all associated works.

A Turbine Delivery Route (TDR) between the Port of Foynes to the proposed development along which turbine components will be transported will include temporary works along the public road.

Should it become operational, the proposed development will be capable of providing an expected Maximum Export Capacity (MEC) in excess 76 Megawatts (MW) of renewable electricity to the National Grid.

The Wind Farm Site layout for which planning permission is being sought is shown in **Figure 3-1** and illustrates the positions of the turbines, access tracks, crane hardstand areas, internal underground cabling, route of the grid connection, substation, permanent meteorological mast, 2 borrow pits, material deposition areas and temporary construction compounds. The proposed development footprint for the access track, hardstands and other facilities within the application area is approximately 255ha.

The layout reflects the outcome of the iterative engineering and environmental analysis approach adopted during the wind farm design process which considered a number of factors including minimising any risk in terms of poor ground conditions, negative influences on the existing drainage, avoidance of sensitive ecological habitats and high flood risk areas, and any known archaeological features. The design rationale and evolution are described in **EIAR Volume II, Chapter 03 Consideration of Alternatives**.

The figures presented in the following sections are for illustrative purposes only. Refer to **Planning Drawings No. 22635-MWP-00-00-DR-C-5005 to 22635-MWP-00-00-DR-C-5020** for details.

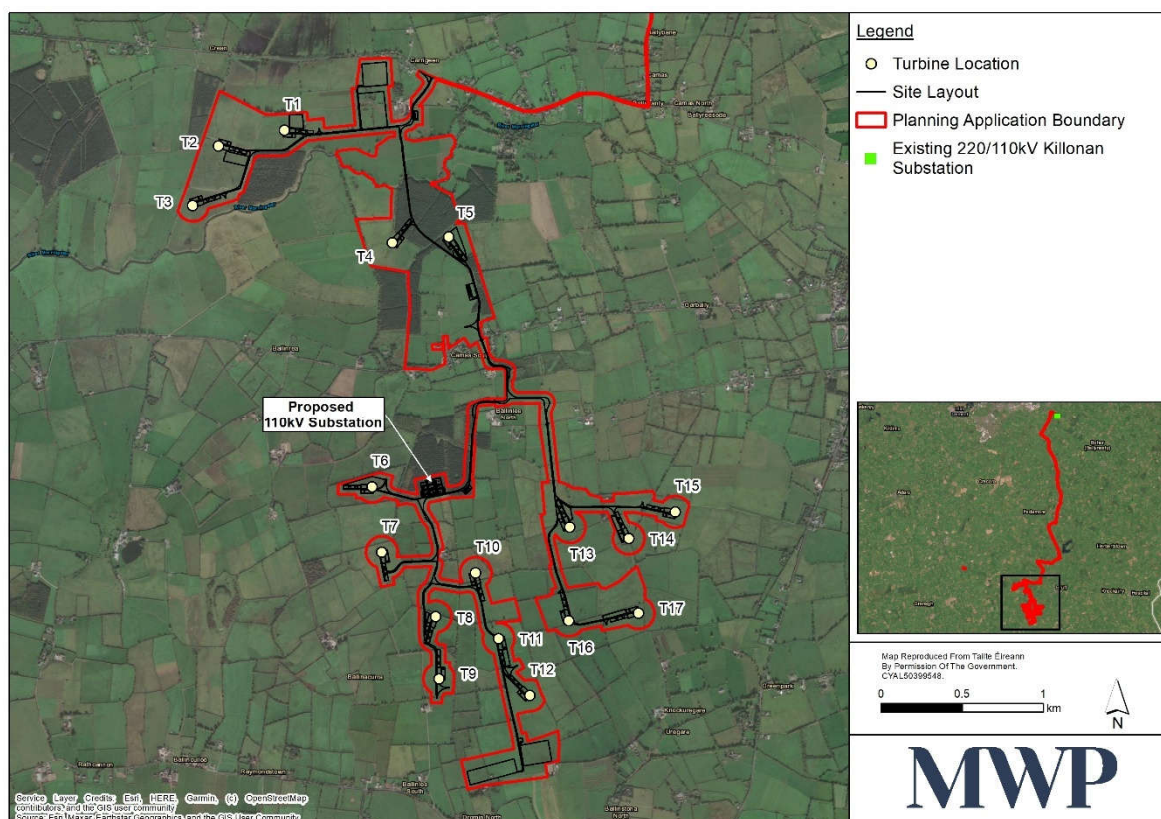


Figure 3-1 Proposed Wind Farm Site Layout

The turbine dimensions for the proposed Wind Farm will have a tip height of 160m with rotor of 136m diameter. There will be one turbine (T6) with a tip height of 150m using the same rotor size of 136m. As part of indicating the likely beneficial environmental effects on the climate, it is considered that the proposed wind farm will have an assumed rated electrical power output in excess of 76 megawatts (MW).

Each wind turbine will have a reinforced concrete base pad foundation with a central plinth above the base, which will support the tower. The foundations are anticipated to be circular in shape and approximately 27m in diameter and 4m in depth. A total of 62,435 m³ of material is expected to be excavated to construct the 17 turbine foundations. The turbine foundations shall be constructed using reinforced concrete construction techniques. Details of foundation designs are provided in Section 4.4.3 of **EIAR Volume III, Chapter 04 Civil Engineering**.

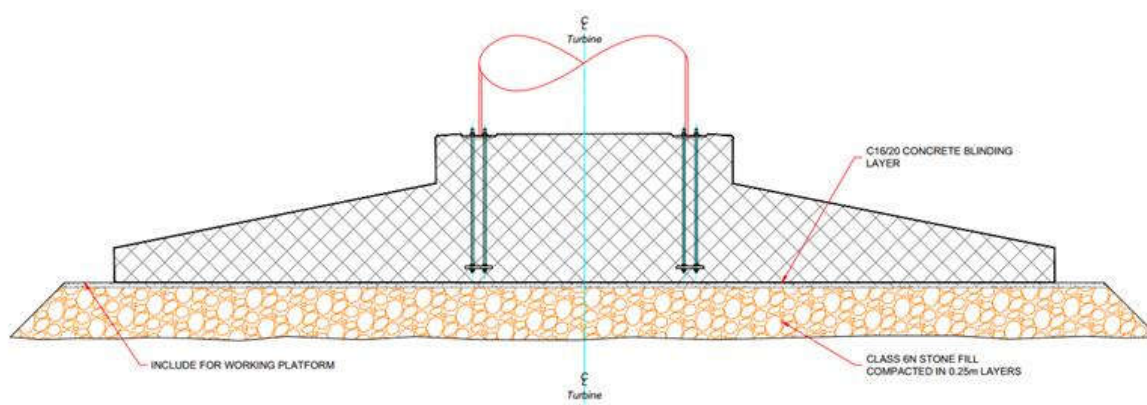


Figure 3-2 Typical turbine foundation detail

3.1 Wind Farm Substation

The proposed 110kV substation (see **Figure 3-3**) will comprise an outdoor electrical yard and two single storey buildings (one for the system operator and one for the wind farm operator). The system operator (Eirgrid) compound and the wind farm operator or independent power producer (IPP) compound make up the substation compound, which measures approximately one hectare in area and is composed of compacted layers of suitable site won crushed rock or granular fill. The Eirgrid building will contain a control room, a storeroom, an office / canteen, a toilet and four parking spaces. The IPP building will contain a storeroom, a communications room, a control room, a staff room, an office/canteen, a switchgear room, a toilet and four parking spaces. The EirGrid substation buildings will be 8.5m in height and the IPP building will be 6.7m in height. See planning application **Drawing No. 22635-MWP-00-00-DR-C-5419** for details of the Proposed Substation Compound layout.

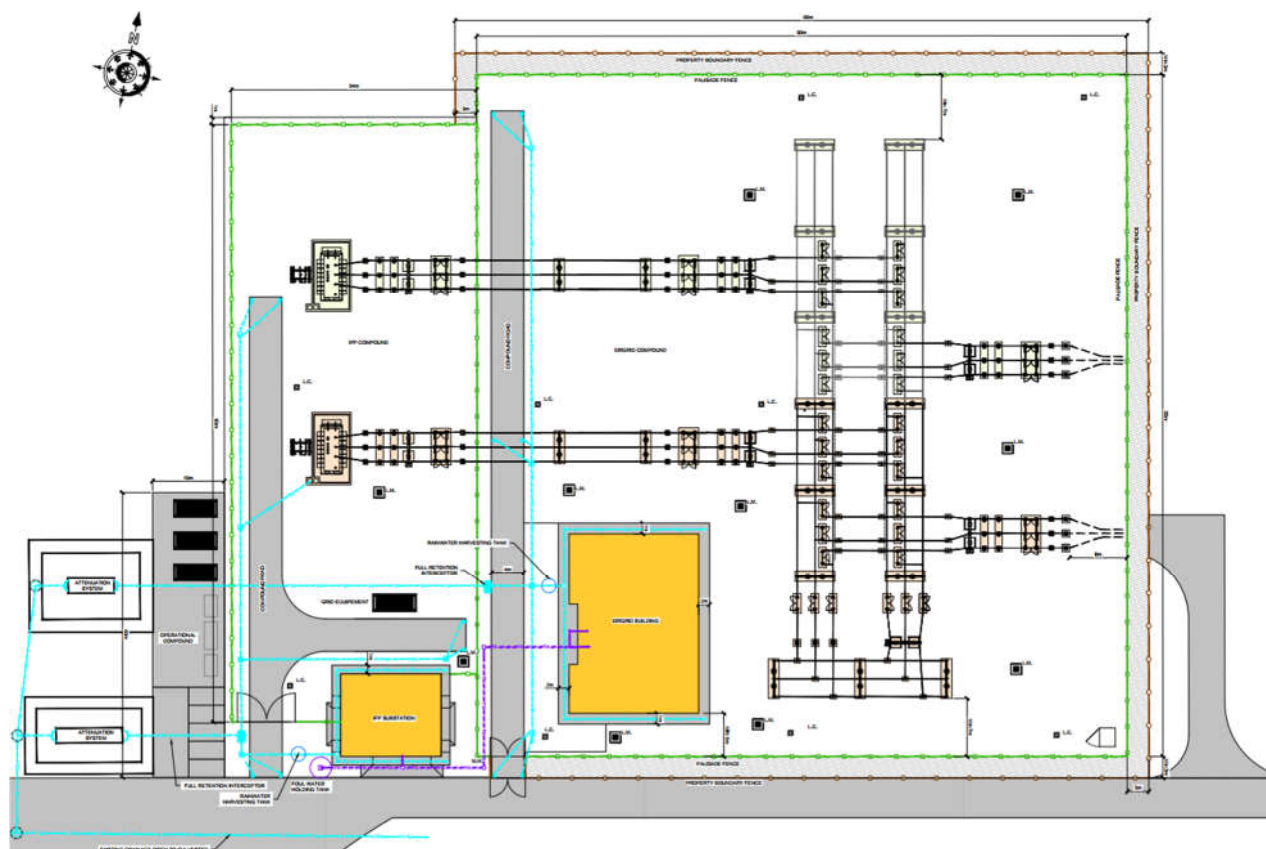


Figure 3-3 Proposed Substation Compound

3.2 Grid Connection Route

The proposed grid connection route is approximately 27.6km in length from the existing Killonan 220/110kV Substation which is located on the Tipperary Road (N24) East of Limerick City to the substation on the proposed Wind Farm Site (see **Figure 3-4**). The route generally follows a southern direction on a mixture of regional and local roads. From the existing 220/110kV Killonan substation the route follows the N24 in a westerly direction and then proceeds along the L1171 for a short distance to the intersection with the L1170 (Ballysimon Commons rd) going south until it intersects with the R512. It then follows south along the R512 through Ballyneety to Hollycross, then west onto the L1412 road, then south along the L8011 road to the R516 where it turns west towards the proposed site entrance. The grid route is also contained in the planning application and within the planning application boundary as shown in Planning **Drawing No. 22635-MWP-00-00-DR-C-5005** (outlined in **Figure 3-4**).

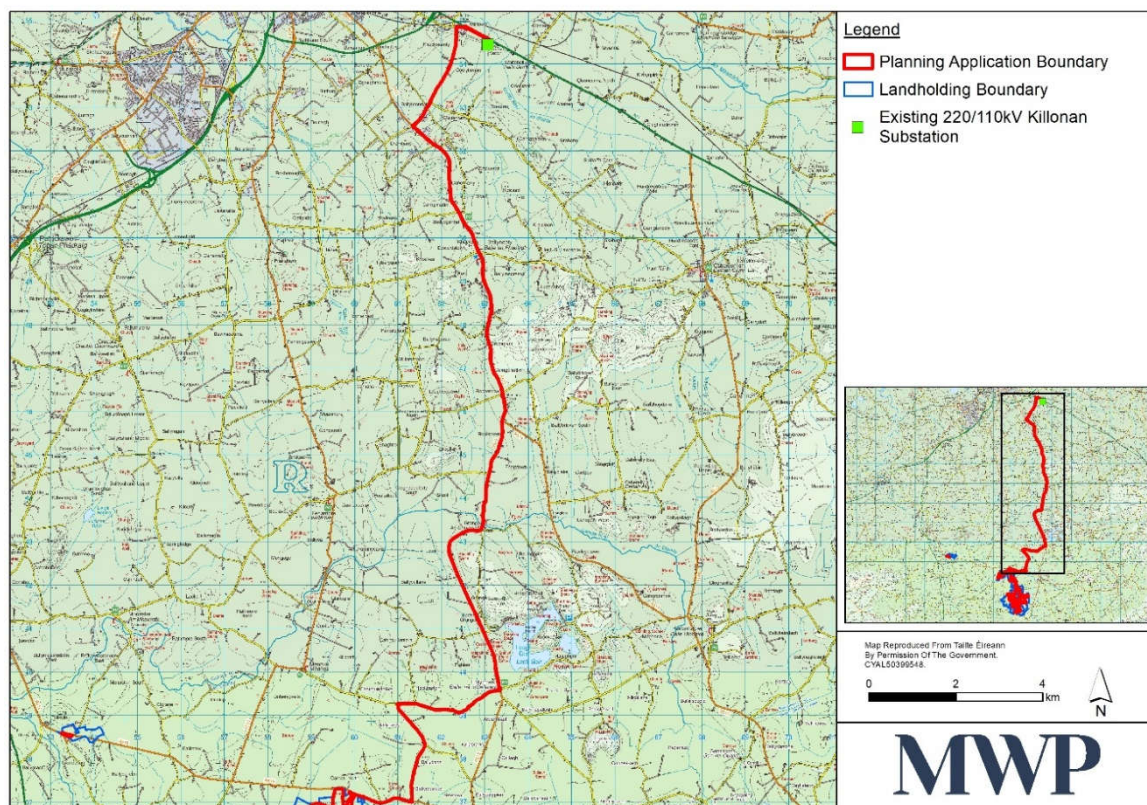


Figure 3-4 Proposed Grid Connection Route

3.3 Turbine Delivery Route (TDR)

The proposed route to deliver wind turbine components from the port at Foynes County Limerick to the proposed Wind Farm Site entrance is shown on **Drawing No. 22635-MWP-00-00-DR-C-5072** and also in **Figure 3-5**

The Turbine Delivery Assessment Report is available in **EIAR Volume III, Appendix 2C**. The proposed Turbine Delivery Route is as follows:

- Depart Foynes Port and travel along the N69 as far as the N18 (east) bypass.
- Turn south onto the M20 and at the N20 junction turn left at Ballybronogue.
- In Croom town turn off on to the R-516 to site.

The delivery of turbine components to the proposed development will require temporary works on sections of the public road network along the delivery route including hedge or tree cutting, relocation of powerlines/poles, lampposts, signage, verge strengthening and temporary local road widening at the site entrance. The potential environmental effects of these temporary works, including hedge and tree cutting and local verge strengthening, have been fully considered and are assessed in the relevant chapters of the EIAR to ensure a comprehensive evaluation of the TDR.

One section of the delivery route, at Tullovin Bridge, will require the construction of a temporary access track approximately 250m in length. It is included in the planning boundary for the proposed development.

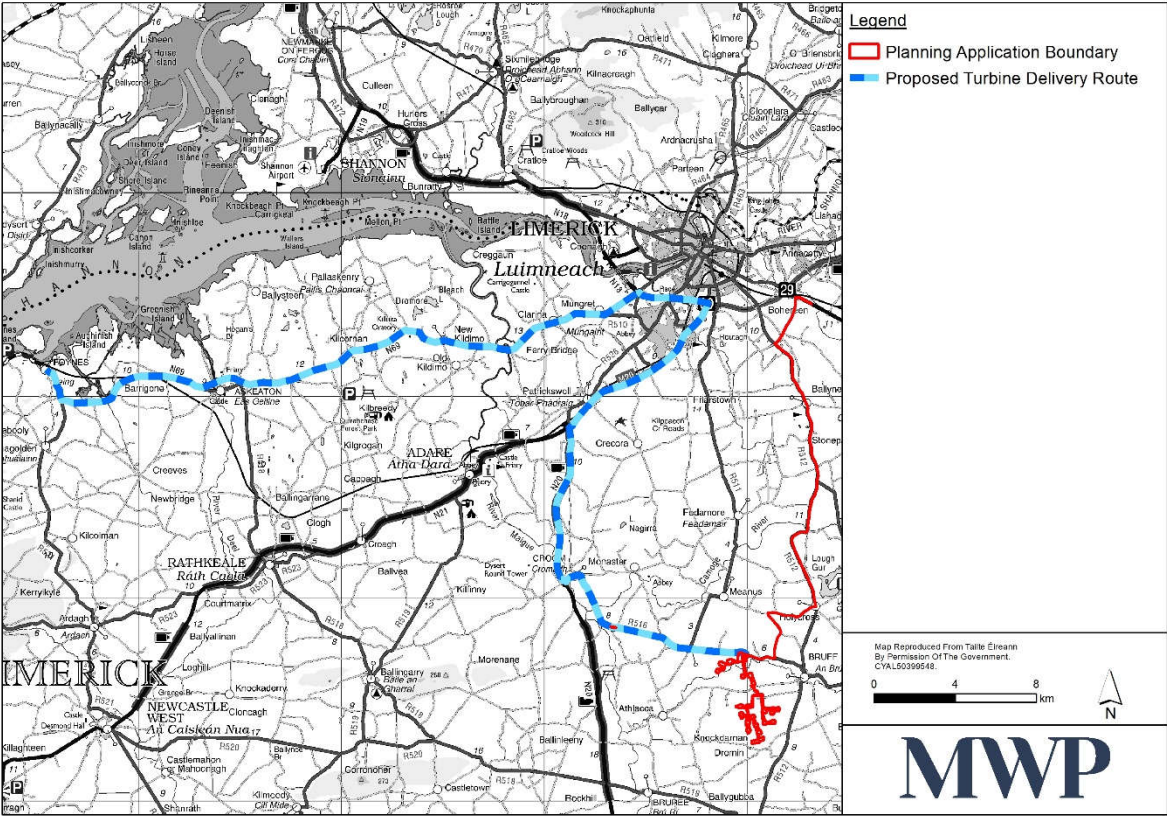


Figure 3-5 Proposed Turbine Delivery Route

4. Planning Policy Context

This section provides a Renewable Energy designation policy statement and outlines the relevant National, Regional and Local Planning Policies including any new and emerging policy and development objectives relating to climate change and renewable energy.

4.1 International Policy

4.1.1 The Renewable Energy Directive

In June 2009, the European Commission published EU Directive 2009/28/EC (the 'Renewable Energy Directive') on the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC on the promotion of electricity produced from renewable energy sources in the internal electricity market.

The Renewable Energy Directive (2018/2001/EU) entered into force in December 2018, as part of the Clean energy for all Europeans package, aimed at maintaining the EU's status as a global leader in renewables and, more broadly, helping it to meet its emissions reduction commitments under the Paris Agreement.

It established a new binding renewable energy target for the EU for 2030 of at least 32%, with a clause for a possible upwards revision by 2023. This target is a continuation of the 20% target for 2020. In order to help EU countries deliver on this target, the directive introduced new measures for various sectors of the economy, particularly on heating and cooling and transport, where progress has been slower (for example, an increased 14% target for the share of renewable fuels in transport by 2030).

It also included new provisions to allow citizens to play an active role in the development of renewables by enabling renewable energy communities and self-consumption of renewable energy and established better criteria to ensure bioenergy's sustainability.

The Renewable Energy Directive was revised again in 2023. The third revision, 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.

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. Article 16b(1) provides that the permit-granting procedure for onshore renewable energy projects outside renewables acceleration areas must not exceed two years. RED III has been transposed by the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. 274 of 2025), as amended by S.I. 426 of 2025.

The proposed development is a 'renewable energy project' and comprises 'renewable energy plant' for the purposes of the revised Renewable Energy Directive (Directive 2023/2413 amending Directive 2018/2001 – "RED

III”). As this application is made after 6 August 2025, S.I. No. 274/2025 - European Union (Planning and Development) (Renewable Energy) Regulations 2025 – also applies to it. The application is for a ‘renewable energy development’ and is subject to Sections 37JA and 37JB of the Planning and Development Act, 2000, as amended by S.I. No. 274/2025 (“2000 Act”). Whereas S.I. 274/2025 partially transposes RED III with respect to the Appropriate Assessment process under Section 177AA of the 2000 Act, those regulations are of limited effect.

Article 16b and Recital 37 makes it clear that the occasional or incidental killing or significant disturbance of birds by the construction and operation of renewable energy plant shall not be considered to be ‘deliberate’ and therefore prohibited by Article 5 of the Birds Directive. Article 16b has the same effect as regards species protected by Article 12 of the Habitats Directive. This is on condition that the renewable energy project has adopted appropriate and necessary mitigation measures.

Article 16b of RED III was required to be transposed no later than 1 July 2024. In the absence of formal transposition, aspects of Article 16b when read together with Recital (37) of RED III are sufficiently precise, clear and unconditional to be directly effective as regards permitting decisions to be made by An Coimisiún Pleanála, planning authorities, and the National Parks and Wildlife Service.

4.1.2 REPower EU Plan

In May 2022, the European Commission published its ‘REPowerEU’ Plan outlining the EU’s path to energy independence from Russian fossil fuels by 2027. The plan outlines short-, medium- and long-term measures covering the following three pillars:

- Demand reduction;
- Diversification of suppliers for conventional (fossil) fuel imports whilst future-proofing the corresponding infrastructure; and
- Acceleration of the transition to renewable energy sources.

The RePower EU Plan states:

“Wind energy represents a significant future opportunity: resources are stable, abundant and public acceptance is higher. Europe is the global leader in offshore wind. To further strengthen the EU wind sector’s global competitiveness and achieve the REPowerEU ambition with fast wind energy deployment, supply chains need to be strengthened and permitting drastically accelerated.”

This policy direction was further reinforced in March 2023, when the EU adopted RED III, amending the Renewable Energy Directive to raise the binding target for renewable energy consumption to 42.5% by 2030, with an indicative top-up to 45%. This represents a near doubling of the EU’s renewable energy share and reflects the urgency of deployment.

Crucially, REPowerEU and RED III both designate renewable energy developments as being in the “overriding public interest”, a legal and policy status that carries significant weight in planning and environmental assessment processes. This designation acknowledges the imperative to accelerate the rollout of renewables in response to geopolitical, economic, and climate challenges.

The proposed development directly supports these EU objectives. It contributes to Ireland’s renewable energy targets, enhances energy security, and aligns with the strategic imperative to expedite permitting and deployment. As such, it benefits from strong policy support at both national and European levels and should be considered favourably in the planning process.

4.2 National Policy

4.2.1 Revised National Planning Framework

The Revised National Planning Framework (NPF) represents a significant shift towards a more structured and proactive approach to renewable energy planning in Ireland, emphasising regional coordination, infrastructure development, and community involvement to achieve national climate and energy objectives.

Ireland's national energy policy is focused on three pillars: (1) sustainability, (2) security of supply and (3) competitiveness. The NPF sets out 10 no. strategic outcomes including a 'Transition to a Low Carbon and Climate Resilient Society'. The Government recognise that Ireland must reduce greenhouse gas emissions from the energy sector by at least 80% by 2050, compared to 1990 levels, while at the same time ensuring security of supply of competitive energy sources to our citizens and businesses. Key features identified in the NPF to facilitate the transition towards a low carbon energy future include:

- A shift from predominantly fossil fuels to predominantly renewable energy sources.
- Increasing efficiency and upgrades to appliances, buildings, and systems.
- Decisions around development and deployment of new technologies relating to areas such as wind, smart grids, electric vehicles, buildings, ocean energy and bio energy.
- Legal and regulatory frameworks to meet demands and challenges in transitioning to a low carbon society.

Government has set ambitious targets to achieve 9 GW of onshore wind, 5 GW of offshore wind and 8 GW of solar by 2030, as well as supporting at least 500 MW of local community-based renewable energy projects and increased levels of new micro-generation and small-scale generation. Chapter 9 of the NPF 'Climate Transition and Our Environment' states that: *"The accelerated delivery of additional renewable electricity generation is therefore essential for Ireland to meet its climate targets, reduce its greenhouse gas emissions, and improve its energy security by reducing reliance on imported fossil fuels and diversifying its electricity supply"*

The NPF also highlights the important role rural areas play in securing a sustainable renewable energy supply, as well as the role renewable energy has in being a new source of jobs and rural growth in OECD (Organisation for Economic Co-operation and Development) Countries.

The various policies in this Framework are structured under National Policy Objectives (NPOs) and National Strategic Outcomes (NSOs). The key policies of relevance to this proposal are:

- **NPO 24:** Support the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades.
- **NPO 30:** Facilitate the development of the rural economy, in a manner consistent with the national climate objective, through supporting sustainable agriculture, forestry, energy, and diversification.
- **NPO 32:** Enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through diversification into new sectors and services, including ICT and climate-related industries.
- **NPO 70** Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a climate neutral economy by 2050.
- **NPO 71** Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development.
- **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.

- **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.
- **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.

In this context, the proposed development is not only consistent with national policy, but also a strategic enabler of Ireland's climate and energy goals. Its location, scale, and technology type align with the NPF's vision for a resilient, low-carbon future, and its delivery will contribute meaningfully to Ireland's 2030 targets and beyond. The proposed development supports the diversification of the rural economy into new sectors and services that are helping to address climate change and sustainability.

The National Development Plan 2021–2030, revised in tandem with the First Revision of the National Planning Framework (NPF) in April 2025, sets out Ireland's strategic investment priorities to support long-term economic, environmental, and social progress. Central to this vision is the transition to a carbon-neutral and climate resilient society, with renewable energy development identified as a key enabler.

The NDP emphasises National Strategic Outcome 8: Transition to a Carbon Neutral and Climate Resilient Society, stating:

“The next 10 years are critical if we are to address the climate crisis and ensure a safe and bright future for the planet. The investment priorities represent a decisive shift towards the achievement of a decarbonised society, demonstrating the Government's unequivocal commitment to securing a carbon neutral future.”

To deliver on these commitments, the NDP outlines substantial investment in:

- Grid infrastructure upgrades to support distributed renewable generation.
- District heating networks and electrification of heating systems.
- Smart grid technologies, microgrid development, and energy storage.
- Offshore and onshore renewable energy, including wind, solar, and biomass.

The NDP sets ambitious targets for renewable electricity capacity by 2030 in line with the NPF. These targets are supported by regular Renewable Electricity Support Scheme (RESS) auctions, which facilitate competitive deployment of grid-scale renewables.

The NDP and NPF require local authorities and regional assemblies to plan for delivery of renewable electricity capacity allocations. The proposed development is consistent with the regional targets set out in Table 9.1 of the NPF, and benefits from the presumption of overriding public interest under RED III and Irish planning law.

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	

Figure 4-1 Extract from National Planning Framework

The proposed development aligns directly with these national priorities. It comprises a 17-turbine wind farm with a generation capacity in excess of 76 MW, contributing meaningfully to Ireland’s renewable electricity targets.

Furthermore, the proposed development supports:

- Energy security, by reducing reliance on imported fossil fuels.
- Economic diversification, particularly in rural areas experiencing population decline.
- Climate resilience, through low-carbon infrastructure investment.

4.2.2 Policy Statement on Energy Security in Ireland to 2030

In November 2023, the Government published a Policy Statement on Energy Security in Ireland to 2030 which outlined the key challenges to ensuring security of electricity supply such as having adequate electricity generation capacity, storage, grid infrastructure, interconnection and system services to meet both average and peak demand. It identifies the critical need to maintain security of supply throughout the transition to the target of up-to 80% of electricity consumption from renewable sources. It highlights the need for significant investment in additional flexible conventional electricity generation, electricity grid infrastructure, interconnection and storage in order to ensure security of electricity supply. It states also that the “majority of renewable energy generated by 2030 will be from wind and solar”. 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.

4.2.3 Climate Action Plan 2025

The Climate Action Plan 2025 (CAP25) is the fourth annual update to Ireland’s Climate Action Plan 2019 and the third to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021. The Plan sets out what needs to be done in 2025, so that the country is prepared to take on the challenges of the second carbon budget period 2026-2030. CAP25 strengthens Ireland's commitment to ensuring a just transition through its four principle framework, focusing on evidence-based planning, skills development, equitable cost distribution,

and social dialogue. Key developments include the establishment of a Just Transition Commission and work on the development of national indicators to measure progress.

CAP25 outlines Ireland's strategic roadmap for achieving its climate transition targets, with a strong emphasis on expanding renewable energy to reduce greenhouse gas emissions by 51% by 2030 and achieve climate neutrality by 2050. One of the key actions identified in CAP25 in terms of renewable energy is the need to accelerate renewable energy generation. It highlights that The Planning and Development Act, 2024, the revised Renewable Energy Directive and the revised NPF together will ensure greater alignment between national, regional, and local authority levels to deliver on the renewable electricity ambition.

CAP25 sets out a number of statistics demonstrating Ireland's progress in meeting climate goals:

- The first half of 2024 saw a reduction of 3.5% in emissions, as compared with the same period in 2023.
- The greatest reductions are in energy. Emissions in the first half of 2024 from the electricity sector were down over 17%, which was the lowest level for decades.
- Irish wind farms generated nearly 40% of Ireland's total electricity demand in the first half of 2024. This makes Ireland third in the world for installed wind power capacity per capita.

Although CAP25 highlights that Ireland has made progress in reducing greenhouse gas emissions, more work needs to be done in order to meet the target of reducing greenhouse gas emissions by 51% by 2030. The renewable energy targets from Climate Action Plans 2023 and 2024 have been retained and carried over to CAP25, with a National target of onshore renewable energy generation of 9GW by 2030. The proposed Wind Farm will contribute to Ireland meeting this goal.

4.2.4 Climate Action and Low Carbon Development Act 2015 (as amended in 2021)

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 (the Commission) 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 requirements are mandatory obligations.

The climate action plans, strategies and objectives listed in Section 15 of the Climate Action and Low Carbon Development (Amendment) Act 2021, with which the Commission must be consistent with, 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 proposed development, 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 proposed development, that favours policy goals, i.e. granting permission. The proposed development 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 proposed development 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 in a position 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 proposed development 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.

4.2.5 Planning Guidelines for Wind Energy (DoEHLG 2006)

In 2006, the Department of Environment, Heritage and Local Government (DEHLG) published Wind Energy Development Guidelines for Planning Authorities (the Guidelines) under Section 28 of the Planning and Development Act, 2000, requiring planning authorities and An Bord Pleanála (at that time) to have regard to the Guidelines in the performance of their functions. The Guidelines offer advice to planning authorities on planning for wind energy through the development plan process and in determining applications for planning permission. They advise on land use and environmental issues for land-based (onshore) wind farms. They also provide clarity to prospective developers and local communities. The Guidelines are also intended to ensure a consistency of approach throughout the country in the identification of suitable locations for wind energy development and the treatment of planning applications for wind energy developments. The proposed development complies with the Guidelines.

4.2.6 Draft Revised Wind Energy Guidelines (DoHPLG, Dec 2019)

In December 2019, the Department of Housing, Planning and Local Government published proposed draft revised guidelines for wind energy developments addressing a number of key aspects including noise, visual amenity setback, shadow flicker, community consultation obligations, community dividend and grid connections. The Draft Revised Guidelines were consulted on from 12 December 2019 to 19 February 2020. The publication of the Draft Guidelines at the end of 2019 followed a lengthy review process including the issue of draft revisions in December 2013 and a Preferred Draft Approach document in June 2017. At the time of writing, the Guidelines have not yet been finalised and are not formally in place, therefore the 2006 Guidelines continue to apply to new developments. Notwithstanding this, the design and environmental assessment of the proposed development has taken due consideration of the proposed new guidelines (e.g. housing setback, shadow flicker, community engagement).

4.2.7 Best Practice Guidelines for the Wind Energy Industry (IWEA 2012)

These guidelines were published in April 2012 as a best practice guide for wind energy developments, replacing the 2008 and 1994 publications of the same title. In the 2012 publication, there is a much greater emphasis on the environmental and community aspects of development, reflecting increased awareness and the need for a higher level of scoping and wider consultation. It is intended as a 'reference document' to complement the DoHPCLG's (formerly DoEHLG) 2006 guidelines and its main purpose is to encourage 'responsible and sensitive wind farm development' that takes into consideration the concerns of local communities, planners and other interested parties. The emphasis is on responsible and sustainable design and environmental practices, external stakeholder relations and good community engagement practices.

Issues addressed include:

- Feasibility Study Guidelines;
- Planning and Environmental Legislation;
- Environmental Impact Assessment;
- Wind Farm layout;
- Health and Safety/Construction and Operation; and
- Community Engagement.

4.3 Regional Planning Policy

4.3.1 Southern Regional Assembly- Regional Spatial and Economic Strategy (RSES)

The Southern Regional Assembly is responsible for the preparation and implementation of a Regional Spatial and Economic Strategy (RSES) for the Southern Region. The RSES for the Southern Region came into effect on 31st January 2020 and the primary aim of the RSES is to implement Project Ireland 2040 - the National Planning Framework. Furthermore, the Southern Regional Assembly supports the implementation of the Irish Government's Climate Action Plan.

The RSES recognises and supports the many opportunities for onshore wind as a major source of renewable energy. The RSES sets out the following Policy Objectives (RPO's) on renewable energy:

- **RPO 87 - Low Carbon Energy Future** The RSES is committed to the implementation of the Government's policy under Ireland's Transition to a Low Carbon Energy Future 2015-30 and Climate Action Plan 2019. It is an objective to promote change across business, public and residential sectors to achieve reduced GHG emissions in accordance with current and future national targets, improve energy efficiency and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture.
- **RPO 99 - Renewable Wind Energy** It is an objective to support the sustainable development of renewable wind energy (on shore and off shore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.
- **RPO 219 - New Energy Infrastructure** It is an objective to support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers (subject to appropriate environmental assessment and the planning process) to ensure the energy needs of future population and economic expansion within designated growth areas and across the Region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs.
- **RPO 221 - Renewable Energy Generation and Transmission Network**
 - a) Local Authority City and County Development Plans shall support the sustainable development of renewable energy generation and demand centres such as data centres which can be serviced with a renewable energy source (subject to appropriate environmental assessment and the planning process) to spatially suitable locations to ensure efficient use of the existing transmission network;
 - b) The RSES supports strengthened and sustainable local/community renewable energy networks, micro renewable generation, climate smart countryside projects and connections from such initiatives to the grid. The potential for sustainable local/community energy projects and micro generation to both mitigate climate change and to reduce fuel poverty is also supported;
 - c) The RSES supports the Southern Region as a Carbon Neutral Energy Region.

4.4 Local Policy

4.4.1 Limerick City and County Development Plan 2022-2028

The Limerick City and County Development Plan (2022-2028) (the Plan) was adopted on the 17th June 2022 and came into effect on the 29th July 2022. The Plan sets the overall strategy for the planning and sustainable

development within the administration boundaries for County Limerick. The Plan has an overarching role in progressing a sustainable energy future for the County by recognising the central role of land use planning in promoting a low carbon society and mitigating the impacts of climate change.

The Plan states that “The Council recognises the importance of onshore and offshore wind energy as a renewable energy source and its national energy targets. Improvements are required in the existing transmission network to fully harness the renewable energy potential in Limerick. The Plan supports maximising the potential of accessing new, emerging byproduct markets to advance the growth of Limerick and to assist in transition to a low carbon society. The Council recognises the significant contribution that wind energy can make as a clean sustainable solution to energy requirements and the role it can play in helping achieve national targets, in relation to fossil fuel reductions and consequently greenhouse gas emissions.

The Council will continue to support and encourage the principle of wind energy development in accordance with Government policy and having regard to the Wind Energy Development Guidelines for Planning Authorities, or any update made thereto during the lifetime of the Plan, subject to the location and siting of such infrastructure and having regard to the extensive designations throughout Limerick in terms of Natura 2000 sites.”

The Plan aims to increase Limerick’s wind energy capacity from 234.35MW to 386.45MW by 2030 which is a target increase of 65%.

The proposed development will have an output of in excess 76 Megawatts (MW) which will contribute to the targets of the development Plan.

Relevant policy objectives outlined in the Plan are listed as follows:

Policy CAF P6 Renewable Energy 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.

Policy CAF P8 Community Based Renewable Energy It is a policy of the Council to support the development of community based renewable energy projects, subject to appropriate levels of environmental assessment and planning considerations.

Objective CAF O28 Assessment of Renewable Energy Projects 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.

Objective CAF O29 Wind Energy Development and Environmental Considerations 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 built environment and the visual and residential amenities of the area.

Objective CAF O30 Location of Wind Energy Developments 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’.

Objective CAF O31 Wind Energy supporting Infrastructure It is an objective of the Council to support the development of appropriate landbased infrastructure and facilities at suitable locations, in order to facilitate the necessary connections for off- shore renewable energy projects.

Objective CAF O35 Community Based Energy Initiatives It is an objective of the Council to support community energy-based initiatives, subject to adequate assessment, to help achieve low carbon communities.

All other policies relevant to the proposed development have been addressed as needed in their respective chapters.

5. Planning Assessment

5.1 Principle of Development

The principle of the proposed Wind Farm project is considered to be compatible with Planning Policy at all levels of government. Renewable energy projects are supported in principle at National, Regional and Local policy levels, with the need to reduce greenhouse gas emissions, reduce reliance on fossil fuels and combat climate change.

It is perhaps sufficient to note the Climate Action and Low Carbon Development (Amendment) Act 2021 establishes a legally binding framework with clear targets and commitments set in law, and ensures that the necessary structures and processes are embedded on a statutory basis to ensure we achieve our national, EU and international climate goals and obligations in the near and long term. The Climate Action Plan implements the carbon budgets and sectoral emissions ceilings and sets a roadmap for taking decisive action to halve our emissions by 2030 and reach net zero no later than 2050. Wind energy is at the heart of the Plan with a target of 9GW of onshore wind energy by 2030.

The common theme throughout policies at a national and regional level is the need to promote and enhance renewable energy in Ireland. This project will contribute directly towards meeting Ireland's renewable energy production targets and specific objectives for onshore wind capacity. Within the Development Plan, Limerick City and County Council have a target of achieving 386.45 MW from Wind Energy by the end of the Plan, which is an increase of 65% of their capacity. The proposed development will contribute greatly to the County in reaching this goal.

The project is located in an area considered to be suitable for wind energy development according to the Development Plan. The proposed site is designated as being a 'preferred area' for wind energy development.

The 2006 Planning Guidelines and the 2012 IWEA Guidelines were consulted in considering the location of the proposed wind farm, its design and layout and also in assessing and, where applicable, mitigating its impact on the environment and the community in which it is located, with particular attention focused on the chapters of the EIAR that assess the specific impacts of wind farm development (i.e. noise, shadow flicker, biodiversity, land, soils, hydrology, landscape and visual, traffic and cultural heritage).

A community participation and engagement programme will provide a gain for the community in the form of a community benefit fund. Further details are provided in **EIAR Volume III Appendix 1C**.

5.2 Design and Layout

The layout reflects the outcome of the iterative engineering and environmental analysis approach adopted during the wind farm design process which considered a number of factors including minimising any risk in terms of poor ground conditions, negative influences on the existing drainage, avoidance of sensitive ecological habitats, set back distances from dwellings and any known archaeological features. The design has also benefitted from input from relevant bodies and the public. The design rationale and evolution is described in **EIAR Volume II Chapter 03 Consideration of Alternative**.

5.3 Environmental Impact Assessment Report (EIAR)

EIA provisions in Irish Law in relation to planning consents are currently contained in the Planning and Development Act, 2000, (Part X) as amended, and in Part 10 of the Planning and Development Regulations, 2001,

as amended. The EIA Directive and the Planning and Development Regulations 2001, as amended, provide that in respect of an application for development consent where EIA is required, the developer (applicant) is required to prepare and submit an EIAR to the competent authority.

This Planning Application is supported by an EIAR. The EIAR includes the following chapters:

1. Introduction
2. Description of Development
3. Consideration of Alternatives
4. Civil Engineering
5. Population and Human Health
6. Biodiversity
7. Ornithology
8. Lands and Soils
9. Water
10. Air Quality
11. Climate
12. Landscape and Visual
13. Noise and Vibration
14. Cultural Heritage
15. Shadow Flicker
16. Material Assets- Traffic
17. Material Assets- Built Services
18. Interaction of the Foregoing
19. Schedule of Mitigation

Each specialist impact assessment chapter includes a methodology, scoping, baseline assessments, impact assessment of the construction, operation and decommissioning phases, mitigation, any design changes to reduce or remove impacts, residual impacts and cumulative effects.

The main findings of the EIAR are set out in 'Volume 1 – Non Technical Summary' of the EIAR report. It is concluded that with the application of various mitigation measures, there are no impacts that are considered unacceptable within the context of the planning policy framework for assessing wind energy projects and also that the proposed wind farm is supported by Government policy regarding the promotion of renewable energy and is consistent with planning guidance for the development of wind energy.

5.4 Residential Amenity

The proposed wind farm site is located on a site currently used for agriculture. There are 4 main possible environmental aspects with potential impacts on residential amenity as a result of the Wind Energy development which are Noise and Vibration, Shadow Flicker, Traffic and Visual Amenity.

The main disturbance during the construction phase of the proposed development will be the generation of additional traffic on the local road networks which may present noise and safety implications as a concern. The operational phase of the proposed development is not expected to present any adverse effects on the human environment. Detailed shadow flicker and noise modelling have been undertaken as part of the EIAR within **Volume II Chapters 13 & 15**. A detailed landscape and visual impact assessment has been undertaken as part of the EIAR **Volume II Chapter 12**.

Mitigation measures have been set out throughout the EIAR for the construction, operational and decommissioning phases of development, to ensure that the impact on the amenity of residents as a result of the proposed development is minimised.

5.5 Cultural Heritage

EIAR Volume II Chapter 14 presents the results of an archaeological, architectural and wider built heritage assessment of potential impacts of the proposed development. This assessment identifies the possible direct and indirect likely significant effects on archaeological features and heritage assets resulting from the construction, operation and decommissioning of the proposed development.

Proposed Wind Farm Site

There are no National Monuments in State Ownership / Guardianship situated within the EIAR study area, which extends within the limits of landholding boundary (including Red Line Planning Boundary).

There are over 30 recorded monuments situated within the primary EIAR study area of which 10 are located within the Planning Boundary. None of these monuments are directly situated on the footprint of the proposed development and consequently there will be no direct physical effect to any of these recorded monuments during the construction phase.

There are no Recorded Protected Structures or NIAH structures within the limits of the Planning boundary or the Landholding Boundary. Therefore, there will be no direct physical effect to any of the structures during the construction phase.

Indirect visual impacts of the proposed turbines on all national monuments within a 10km distance of the proposed turbines is classified from 'slight' to 'moderate'. There are no archaeological impacts anticipated in the course of the de-commissioning of the proposed turbines. Potential subsurface archaeological issues will have been adequately resolved by the mitigation measures in advance of constructions phase of the project.

Proposed Grid Connection Route

A c.120m buffer corridor along the proposed grid route was archaeologically assessed to establish potential physical impacts to the national monuments and wider recorded monuments located in proximity to the proposed grid connection route.

There are six recorded monuments within the 120m wide assessment corridor of the proposed Grid Connection Route. Five of the six monuments are situated in the vicinity of the grid connection route and one (Bridge LI023-063002) is located directly on the footprint of the proposed cable route. There are eight built heritage structures listed in the National Inventory of Architectural Heritage (NIAH) located in proximity to the proposed Grid Connection route. One of the structures (Sixmile Bridge) is a Recorded Protected Structure.

The potential physical impact to the Sixmile Bridge is classified as significant and in that context, horizontal directional drilling (HDD) will be undertaken to mitigate impacts.

Turbine Delivery Route

There are no Recorded Monuments situated directly on the proposed TDR. There are however two sections of the route (pinch points 10 & 11, detailed in EIAR Volume III, Appendix 2D) where turbine deliveries will cross the Zone Of Notification (ZON) of Croom Historic town LI030-025001. Analysis of these enabling works show that there will be no physical impact to any recorded monuments within Croom town and consequently potential physical impact is classified as 'not significant'.

During the operational phase, no direct effects will occur. Any likely direct effects will occur at the construction phase of the proposed development.

5.6 Appropriate Assessment (AA) Screening Report and Natura Impact Assessment (NIS)

The planning application is supported by an Appropriate Assessment (AA) Screening Report and Natura Impact Statement (NIS) prepared by Woodrow. The Screening for AA concluded that Likely Significant Effects could not be excluded for the Lower River Shannon SAC, and the River Shannon and River Fergus Estuaries SPA. Therefore, it was deemed that the Development be subject to Stage 2 AA and an NIS be prepared.

The NIS is a report of a scientific examination of evidence and data, carried out by competent persons to identify and classify any implications of a project, individually, or in combination with other plans or projects, for Natura 2000 sites in view of the conservation objectives of the sites. The NIS report concludes that while a number of potential effects pertaining to water quality and otter were identified, including in-combination effects, the mitigation measures presented within the report would eliminate the potential for adverse effects.

Therefore, in view of best scientific knowledge, while applying the precautionary principle and considering the conservation objectives of the relevant European Sites, it is considered that the proposed development will not have an adverse effect on the integrity of any European Site, either alone or in combination with any other plans or projects.

5.7 Landscape

An extensive Landscape and Visual Impact Assessment has been undertaken as part of **EIAR Volume II Chapter 12**. In accordance with best practice, the zone of theoretical visibility (ZTV) radius recommended is 20km from the outermost turbines of the scheme. There will be a particular focus on receptors and effects within the Central Study Area where there is a higher potential for significant impacts to occur. When referenced within this assessment, the 'Central Study Area' is the landscape within 5km of the Site. The remainder of the Study Area beyond 5km to the 20km outer limit is referred to as the 'Wider Study Area'.

It is policy for 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 Development Plan, as per Objective CAF 029. It is considered that the proposed development is consistent with the landscape objectives of the Development Plan as demonstrated **EIAR Volume II Chapter 12**.

A summary of the conclusion of the assessment of the landscape impacts and effect and the visual impacts and effects during the construction, operational and decommission phase is outlined as follows:

Assessment of Landscape Impacts and Effects

Construction Phase

The magnitude of landscape impact in relation to this combination of factors at the construction phase is deemed to be of a High-magnitude within the Site and its immediate surrounds (<c.1km), which when combined with a Medium-Low sensitivity, results in a worst-case significance of landscape effect of Substantial-moderate, which will be of a Negative quality. With increasing distance beyond 1km, the magnitude of Construction Phase impacts will reduce as the ground based activity becomes increasingly screened from view and the development and activities become an increasingly smaller component of a much broader landscape context. Consequently, the significance of effect also reduces to Moderate and Moderate-slight. Beyond the central study area, the

significance of Construction Phase landscape effect reduces further and only relates to the emergence of the pre-commissioned turbines. It is considered that the project will not generate significant landscape effects during the construction phase.

Operational Phase

Within the Central Study Area and in relation to the Site and its immediate environs (within approximately 1km), the magnitude of change to landscape character is deemed to be High-medium. When combined with a Medium-Low sensitivity, the level of landscape effect is considered Moderate. Beyond this distance, the magnitude of change to landscape character will reduce to Medium-Low for the remainder of the Central Study Area. When combined with a Medium-Low sensitivity, the resulting level of landscape effect is deemed Moderate-slight tending to Slight with increasing distance.

For the Wider Study Area, the magnitude of change to landscape character will reduce to Low and Negligible with increasing distance from the Site, as the proposed wind farm becomes a proportionately smaller and less distinct component of the overall landscape fabric, and other features and characteristics prevail in their influence on character. When combined with a Medium-low sensitivity, the resulting level of landscape effect is deemed Slight or lower.

It is not considered that there will be any significant adverse landscape effects arising during the operational phase of the wind farm.

Decommissioning phase

The decommissioning phase will have similar effects as the construction phase primarily as a result of the removal of turbines and the movement of large turbine components away from the Site. As with construction phase effects, decommissioning phase effects are deemed to be at most Moderate and Negative, but this is a temporary effect that is not considered to be significant in EIA terms.

Assessment of Visual Impacts and Effects

Construction Phase

For visual receptors within the Central Study Area, the magnitude of visual impact at the construction phase is deemed to be High-medium. When combined with a generally Medium-low receptor sensitivity, the level of visual effect will be no greater than Moderate. Even though the sensitivity of visual receptors at Lough Gur and Tory Hill, have higher sensitivity, the magnitude of impact reduces with increasing distance, broader context and screening of ground based construction activity. Consequently, the significance of construction phase visual effects is not considered to be greater for these visual receptors.

For visual receptors in the Wider Study Area, the ground-based activity associated with the turbine construction is unlikely to notably influence the visual amenity of any given view, given that this activity would be difficult to discern at distance and due to intervening screening. When combined with a generally Medium or Medium-low sensitivity, the level of visual effect will be no greater than Moderate-slight.

It is not considered that the proposed development will generate significant visual effects at the construction phase.

Operational Phase

The visual impact assessment was conducted with 22 selected representative viewpoint locations. A summary of the operational phase visual impact assessment from these viewpoints is discussed within **EIAR Volume II Chapter 12**. The overall visual effect was deemed to be Moderate-slight and largely on the basis that the receptor was assessed to be of a High-medium sensitivity as the magnitude of change was only considered to be Low.

Decommissioning Phase

The decommissioning phase will see a similar nature of effects to the construction phase due to the movement of heavy machinery within the Site, and to and from the Site removing turbine components. However, such effects will be temporary in duration and decrease in scale as turbines are removed from view and the landscape is substantially reinstated.

6. Conclusion

This statement seeks to highlight the relevant planning merits relating to the proposed Wind Energy Development in County Limerick which seeks planning permission from An Coimisiún Pleanála under 37E of the Planning and Development Act 2000, as amended. The development design has undergone an extensive engineering and environmental analysis and has been informed by consultation with the public and relevant bodies. The environmental studies and assessments completed demonstrate the proposed development will not create an unacceptable impact on the environment and residential amenity. The NIS, which will be subject to Appropriate Assessment by the competent authority, concludes that the proposed development, either individually, or in combination with other plans/projects, will not affect the integrity of any Natura 2000 Sites in view of the sites' conservation objectives.

The proposed Wind Farm Site is located in a 'Preferred Area' for Wind Energy Developments within the Limerick City and County Development Plan (2022-2028). This Planning Statement has clearly demonstrated that the proposed development is acceptable and consistent with planning policy at an international/EU, national, regional and local level. It is therefore considered that the proposed development is in accordance with the proper planning and sustainable development of the area and will contribute towards achieving National and EU targets and in particular the objectives of the Climate Action Plan. It will also contribute towards Limerick City and County Council's goal of becoming a leader of renewable energy provision and meeting the County's energy target for 2030.