

Proposed Gathabawn Windfarm

Environmental Impact Assessment Report

Chapter 1: Introduction & Policy Context

September 2026

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Chapter Glossary

Name	Description
Gathabawn Windfarm	Twelve wind turbines are proposed for two areas – seven turbines in the Ballylehaun area and five turbines in the Ballyring area. In addition to the turbines and their hardstanding areas, the windfarm also includes site access roads, two Control Buildings; a met mast, underground cabling, temporary works to facilitate turbine deliveries, and other associated and ancillary works.
Candidate Gathabawn Grid Connection	Underground cabling between the Ballylehaun and Ballyring Areas (Ballylehaun-Ballyring UGC), underground cabling from the Ballyring Area (from Ballyring Control Building) to a new substation at Parksgrove (Ballyring-Parksgrove UGC), the Parksgrove Substation, and underground cabling from the substation to the existing Eirgrid Ballyragget Substation in Moatpark (Parksgrove-Moatpark UGC). The Candidate Gathabawn Grid Connection is not included as part of this Planning Application, it will be subject of a separate Planning Application, at a future date. The Candidate Gathabawn Grid Connection is considered in this EIA Report in order to facilitate the cumulative evaluation of the Whole Project.
Whole Project	Gathabawn Windfarm and Candidate Gathabawn Windfarm Grid Connection

CHAPTER 1 INTRODUCTION & POLICY CONTEXT

EIAR 1.1 Introduction to the Planning Application

This EIA Report is a report of the effects, which the proposed 12-turbine Gathabawn Windfarm and associated grid connection, is predicted to have on the environment.

Following pre-application consultations between Ecopower Developments Limited (EDL) and An Coimisiún Pleanála (the Commission) in relation to a proposed windfarm in North County Kilkenny – to be called Gathabawn Windfarm, the Commission served notice that it is of the opinion that the proposed development would be Strategic Infrastructure Development (SID) and therefore any application for planning permission for the development must be made directly to the Commission, under section 37E of the Planning and Development Act 2000, as amended (Pre-Application ABP Ref. 313780-22).

EIAR 1.1.1 Competency of the Promoters

The Project Promoter is Ecopower Developments Limited, part of the Ecopower Group. See the Ecopower Website www.ecopower.ie

Ecopower was established in 1996, with a particular interest in on-shore wind energy developments. The company is wholly owned and managed in Ireland. The Ecopower windfarm development team is experienced in site investigations and site optimisation; compilation of planning applications; grid connection procurement; regulatory and policy compliance; financing and construction of windfarm projects. Additionally, Ecopower's operation and maintenance team provides an asset management and windfarm operation and maintenance service. The Ecopower development team leads Pat Brett and Phil Kenealy have been involved in the identification, planning and development of windfarms in Ireland for the past 30-years. Ecopower developed and operates five windfarms in Ireland – in Mayo, Donegal and Kilkenny, with an 84MW windfarm currently under construction in County Tipperary. Ecopower Supply sells electricity to households and businesses throughout Ireland.

EIAR Chapters 1-5 and the Non-Technical Summary have been compiled by the Ecopower Developments planning team, managed by Julie Brett and Phil Kenealy. The Ecopower planning team has completed site investigations, assessments and planning applications on 27 windfarm projects on-shore in Ireland.

The competency of the Ecopower planning team is set out below:

- **Julie Brett** - EIAR Lead (Dip. EIA) Julie has 23 years project management experience in Ecopower in site investigations focusing on constraints, alternatives and mitigation and co-ordinates the multi-disciplinary experts during the preparation of the EIAR.
- **Phil Kenealy** - Planning & Policy Lead (Dip. EIA). Phil has 30 years experience in windfarm development and has been fully involved in the planning and development of the Ecopower development and operational portfolio.
- **Conor Brett** - Site Design Lead BSc (Hons), Cert.EIA. Conor has 17 years experience in the design and construction set-out of the Ecopower portfolio.
- **Aoife Butler** - (AutoCAD technician, Cert.EIA). Aoife has 15 years experience specialising in EIA Report Figure design and mapping of windfarm proposals.
- **James Carroll** - BSc (Hons), Cert.EIA. James has 6 years experience with Ecopower, specialising in GIS and 3D Design of windfarm proposals
- **Claudia Carey** - BSc (Hons). New to the Ecopower team with past experience in GIS, design and audit of construction sites with a utility infrastructure group in Ireland.

EIAR 1.1.2 Structure of the Planning Application

This planning application comprises a suite of application documents as detailed below

Table 1-1: Documents accompanying this Planning Application

Document Title
Planning Documents including • Planning Application Form and Appendix • Applicant's Cover Letter including Schedule of Submitted Documents • Newspaper Notices • Site Notice and Site Notice Location Map • EIA Portal Confirmation Notice • Notification Letter to Kilkenny County Council • Copy of Notification Letter to all Prescribed Bodies and Schedule of Prescribed Bodies Notified • Community Report • Planning Statement including RED III Designation Statement. Appendices to the Planning Statement 1) ACP Confirmation of SID including List of Prescribed Bodies to be Notified; and 2) Applicants Completeness Checklist to facilitate the checks being undertaken by An Coimisiún Pleanála 3) Community Report
<u>Planning Drawings Pack</u> including Schedule of Submitted Drawings
<u>Environmental Impact Assessment (EIA) Report</u> • EIA Report for Gathabawn Windfarm comprising 21 No. chapters with relevant Figures and Appendices at the end of each Chapter • LVIA Photomontage Books 1 - 3 • Non-Technical Summary of the EIA Report 2026
<u>CEMP</u> Construction Environmental Management Plan (CEMP)
Appropriate Assessment Report (Natura Impact Statement)

ElAR 1.2 The Gathabawn Windfarm Proposal

The proposal is to build a windfarm, ancillary and associated works. The proposed Gathabawn Windfarm will comprise the following elements:

- Twelve (12) wind turbines with a rotor diameter of 136m. Two hub heights are proposed – 82m for Turbine T6, T7 & T9, and 102m for all other turbines, thus giving an uppermost tip height of 150m for T6, T7 & T9, and 170m for all other turbines. Construction of 12 No. turbine foundations and adjacent hardstandings;
- Site roads of 8km in total length, comprising 6.7km in length of new roads and the upgrading and widening of 1.3km of existing private farm tracks;
- Two (2) electrical Control Buildings - one in the Ballylehaun area and one in the Ballyring area. The buildings measure 20m x 10m, with a height of 7m and contain electrical and communications equipment, along with a storage room, canteen and welfare facilities;
- Underground electrical cabling linking the wind turbines together into a turbine 'string' and ultimately connect these strings to the two Control Buildings;
- One (1) 30m lattice tower mast and one (1) LiDAR unit for measuring on-site meteorological conditions;
- Seven (7) site entrances from the public road, comprising both existing and newly created entrances;
- Temporary works to facilitate the transport of the large components to the turbine locations. These works comprise temporary access road; some minor public road widening; temporary hardstanding area; and temporary widening of existing field entrances off the public road;
- Installation of an integrated drainage system to manage surface water run-off during all phases of the proposed development;
- All associated infrastructure, services and ancillary site works including excavation, earthworks, temporary and permanent overburden storage berms; temporary and permanent fencing; and hedgerow and tree removal, reinstatement and enhancement;
- Two (2) temporary construction compounds and two (2) on-site temporary borrow pits;
- Creation of a Biodiversity area for the protection, enhancement and creation of habitats to serve as a functioning high level biodiversity resource for local flora and fauna communities.

A period of 10-years during which Gathabawn Windfarm can be constructed is herein requested, to allow for the complexity of financing and construction of windfarm and grid infrastructure. An operational duration of 35-years is requested.

The grid connection point for the proposed Gathabawn Windfarm, has not yet being confirmed by Eirgrid but is likely to be the Eirgrid Ballyragget Substation, circa 7km to the east of the proposed windfarm site. This grid connection (to be called Candidate Gathabawn Grid Connection in the Application Documents) comprises underground cabling along the public road c. 5.6km in length between the control buildings a cross-country underground cable route from the Ballyring Control Building to Parksgrove townland, 8.8km to the east. Also includes the construction of a new substation and substation compound at Parksgrove and then a further 1.5km of underground cabling from Parksgrove to the Eirgrid Ballyragget Substation at Moatpark townland.

The Candidate Gathabawn Grid Connection is not included as part of this Planning Application, it will be subject to a separate Planning Application, at a future date. The Candidate Gathabawn Grid Connection is considered in this EIA Report in order to facilitate the cumulative evaluation of the whole Gathabawn Windfarm project.

See [Figure 5.1.1: Whole Gathabawn Windfarm Project - Location on Discovery Mapping](#) at the end of this Chapter.

EIAR 1.2.1 Location of Gathabawn Windfarm

The proposed Gathabawn Windfarm is located entirely within County Kilkenny, with the wind turbines located on two areas of high ground – at Ballylehaun and at Ballyring. The nearest village is Gathabawn village which is 1km southeast from the nearest Ballylehaun turbine and 3km west from the nearest Ballyring turbine. Lisdowney village is located 3km to the northeast of the nearest Ballyring turbine, and 6km from the Ballylehaun turbines. The town of Ballyragget is located 6km northeast of Ballyring and 10km east of Ballylehaun, while the town of Johnstown is located 6km from Ballylehaun and 9km from Ballyring.

In neighbouring County Laois, Cullahill village is located 3km north of the nearest Ballylehaun turbine and 6km northwest of the nearest Ballyring turbine, while Durrow town is located 9km to the northeast of the nearest turbines.

The windfarm will be sited in the townlands of Coolnacrutta, Glashare, Ballylehaun, Gorteennamuck, Rathlogon, Ballyring Upper, Ballyring Lower and Tentore.

The windfarm site is characterised as rural open countryside with lands enclosed by hedgerows or stone walls. There are farmsteads and one-off housing located along the local roads and generally the commercial, civic and community services are in the surrounding small towns and villages. Farming in the area is predominantly grassland supporting dairy and beef cattle and to a lesser degree sheep farming and tillage.

EIAR 1.2.2 Purpose of Gathabawn Windfarm

The proposed Gathabawn Windfarm is aligned with National and International policy to transition to a carbon neutral future, necessitated by an ever increasing imperative to ameliorate climate change. The generation of electricity from a clean, renewable source like the wind is a core component of these policies.

The renewable electricity (RE-E) generated at Gathabawn Windfarm will contribute positively to climate action targets by generating electricity without polluting greenhouse gas (GHG) emissions which are the primary cause of accelerated climate change. The average predicted value of this contribution from the turbine options proposed is set out in the table below.

Table 1-2: Gathabawn Windfarm Contribution to Climate Action

Predicted Production (kWh per annum)		
150,000,000 kWhr	Kilowatt hours (kWh) of electricity per annum which will be generated by 12 wind turbines at Gathabawn Windfarm	The energy yield of a windfarm is predicted using industry standard wind modelling software e.g. WindFarmer and WAsP, which is input with the following data points: • Long-term windspeed and direction data is sourced from the Global Wind Atlas Site terrain data • Landuse on-site and on adjacent lands e.g. forestry, grassland, buildings, adjacent turbines, to calculate yield losses through wake effect • Turbine placement locations, • Turbine hub heights, and turbine rotor diameter, to calculate m² of swept area, and turbine power curves. For the Gathabawn Windfarm, the Vestas V136 (4.5MW) turbine was used to model the production. The wind modelling software can then predict the average energy yield from the windfarm site.
CO ₂ e Offsets		
CO₂e offsets: Gathabawn Windfarm will generate circa 150 million kWh of RE-E every year without emitting greenhouse gases (GHG) or ash pollution and this will avoid an equal amount of electricity being generated from gas, coal or oil, which does emit GHG. The gases in a GHG bundle (carbon dioxide, methane, nitrous oxide and ozone) are represented by CO₂e (Carbon Dioxide equivalent) when discussing offsets.		
Saving of 38,250 tonnes of CO ₂ e per annum	CO ₂ e tonnes per annum that would otherwise be emitted if the kWh generated by Gathabawn Windfarm, was instead generated by gas, coal and oil	Source: Based on the energy intensity of the Irish electricity generation mix of 255g CO₂/kWh (EPA, 2024)
Homes Supplied		
33,237 homes in Kilkenny per annum	Based on the average electricity use in Irish homes of 4,513 kWhr electricity per annum	Source: Sustainable Energy Authority of Ireland Final energy per dwelling kWh/home per year 2022 Infograph https://www.seai.ie/data-and-insights/seai-statistics/residential
Forestry carbon sequestration Equivalent		
Equivalent to 3,102 ha (31 square kilometres) of forestry	Equivalent hectares of forestry required to sequester the same amount of CO ₂ e as the offsets from Gathabawn Windfarm	Source: COFORD estimate that Irish forests sequester on average 3.36 tonnes of carbon per hectare per year (COFORD, 2006) 1 tonne of Carbon = 3.67 tonnes of CO₂. Therefore 1 hectare of Irish forest sequesters 12.33 tonnes of CO₂ per annum. The COFORD Council is a body appointed by the Minister for Agriculture, Food and the Marine to advise the Minister and his Department on issues related to the development of the forest sector in Ireland.
Diesel/Petrol Cars 'switching to Electric Car' Equivalent		
Equivalent to 22,238 cars switch-ing to Electric Vehicle (EV)	Number of diesel/petrol cars that would emit the equivalent amount of CO ₂ e per annum as that offset by Gathabawn Windfarm	Source: CO₂ emissions per kilometre for private cars was 113.2g CO₂/km in 2024 (SEAI, n.d. b). The average car in Ireland travels c.15,200km per annum (CSO, 2024) and therefore the average car in Ireland emits 1.72 tonnes of CO₂ per annum. CSO Transport Environmental Indicators Ireland 2024 - Statistics

EIAR 1.3 Planning Statement/Policy Context

EIAR 1.3.1 European Policy Context

EIAR 1.3.1.1 Versailles Declaration and REPowerEU Emergency Plan

On 10th /11th March 2022, in response to Russia's invasion of Ukraine, the heads of state of the EU member States issued the Versailles Declaration¹. The Declaration addressed reducing the EU's dependence on Russian energy supplies by phasing out the EU's dependency on Russian gas, oil and coal imports as soon as possible. One of the key actions to achieve this is by speeding up the development of indigenous renewables and the production of their key components, as well as streamlining authorisation procedures to accelerate energy projects. The participants invited the European Commission to propose a plan to this effect by the end of May 2022.

In response, the Commission adopted an emergency strategy to boost Europe's energy independence, called REPowerEU², which is based on two pillars 1) Diversifying gas supplies and 2) Accelerating renewables and energy efficiency.

Relevant to Gathabawn Windfarm, REPowerEU recognises the central role of wind energy: the EC wants 510 GW of wind energy capacity installed by 2030, up from 190 GW today.

EIAR 1.3.1.2 Regulation (EU) 2022/2577

In July 2022 the European Council agreed ground-breaking political actions to achieve an orderly and co-ordinated reduction of gas consumption across the EU. This agreement is intended to complement all the other actions taken to date in the context of REPowerEU, notably to diversify sources of gas supply, speed up the development of renewables and become more energy efficient.

In this context, on 22 December 2022 the Council adopted *Regulation (EU) 2022/2577 laying down a framework to accelerate the deployment of renewable energy*. This Regulation aimed to shorten and accelerate the permit-granting procedures that are needed for renewable energy projects as well as for grid and infrastructure projects, to integrate renewable energy into the electricity system. Also, the Regulation seeks to bring clarity on binding permitting deadlines, make it easier to repower windfarms, and ensure renewables are presumed to be of overriding public interest. In December 2023 the Council of the EU, extended and amended Regulation 2022/2577, applicable from 1 July 2024.

It is clear from the urgency conveyed by the REPowerEU Emergency Plan and Regulation EU 2022/2577 that the accelerated deployment of renewable energy is crucial to mitigate the impact of energy crisis, eliminate the EU's dependency on imported Russian gas and provide energy security to Member States.

Renewable electricity (RE-E) generated at Gathabawn Windfarm will support the Regulation EU 2022/2577 plans for indigenous European Union renewable electricity supplies. renewable Energy Directive III is the follow on legislation to Regulation (EU) 2022/2577.

¹ <https://www.consilium.europa.eu/media/54773/20220311-versailles-declaration-en.pdf>

² https://ec.europa.eu/commission/presscorner/detail/en/IP_22_3131

EIAR 1.3.1.3 Renewable Energy Directive III

The Renewable Energy Directive 2009/28/EC (RED) is the legal framework for the development of renewable energy across all sectors of the EU economy, supporting clean energy cooperation across EU countries. Since the introduction of the RED in 2009, the RED has undergone several revisions, all pushing the renewable energy targets upwards, to combat increasing emissions. The REDs sets the overall target for renewable energy in the EU.

Since the introduction of the Renewable Energy Directive, the share of renewable energy sources in EU energy consumption has increased from 12.5% in 2010 to 24.6% in 2023. The latest RED - RED III (EU/2023/2413) entered into force on the 20th of November 2023. RED III increases the EU wide renewable energy target from 32% set under the previous revision of the directive to at least 42.5% of energy requirement, with an ambition to reach 45% by 2030. **Significantly, RED III recognises renewable energy as an overriding public interest.**

In addition to the new headline target to double the existing share of renewable energy sources, RED III provides a strong policy framework to facilitate electrification in different sectors. Electricity equates to approx. one-third of total energy requirement and this continues to grow as electricity contributes to transportation also through the roll out of electric vehicles.

According to the European Commission³ under the European Green Deal agreement reached on 30th March 2023 to reinforce the Renewable Energy Directive, the EU's determination to gain its energy independence through a faster deployment of home-grown renewable energy and to meet the EU's 55% greenhouse gas emissions reduction target for 2030, is affirmed. It is intended that there will be a massive scaling-up and speeding-up of renewable energy across power generation, industry, buildings and transport which will reduce energy prices over time and decrease the EU's dependence on imported fossil fuels.

EIAR 1.3.1.3.1 Transposition of RED III into the Planning Code

In July 2025 under S.I. No. 274 of 2025 *European Union (Planning and Development) (Renewable Energy) Regulations 2025*, certain articles of RED III were transposed into the planning code. These include articles to speed up permit granting for renewable energy projects by providing for;

- An application 'completeness check'
- Mandatory permit granting timelines
- Renewable energy plants are presumed to be in the overriding public interest for the purpose of appropriate assessment under the Habitats Directive.

The proposed Gathabawn Windfarm development is a Renewable Energy Directive III (RED III) Development. This development is covered by the provisions of the Renewable Energy Directive III (Directive (EU) 2023/2413).

Renewable electricity generated at Gathabawn Windfarm, will support Ireland in reaching its legally binding obligations under RED III of achieving at least 42.5% of energy requirement from renewables by 2030.

EIAR 1.3.1.4 European Green Deal 2020

The aim of this policy is to make Europe climate neutral by 2050. In 2021, the European Climate Law made greenhouse gas emission targets a legal obligation. These targets were increased from 40% to 55% by 2030.

³ https://ec.europa.eu/commission/presscorner/detail/en/ip_23_2061

EIAR 1.3.1.5 Directive 2000/60/EC, the Water Framework Directive

The Plan - Water Action Plan 2024: A River Basin Management Plan for Ireland, responds to the requirements of the Water Framework Directive, to accelerate the identification and implementation of the right measures in the right places to both restore and protect all water bodies. The catchments.ie website provides substantial background information for this Plan and the most current and up-to-date information on the status of local rivers, lakes and water bodies.

The Water Framework Directive assessment report, appended to the Water Chapter of the EIA Report, demonstrates that the proposed Gathabawn Windfarm development will not result in a risk of deterioration on any waterbody (rivers, lakes, groundwaters, transitional and coastal) either qualitatively or quantitatively, or on a temporary or permanent basis, or otherwise jeopardise any waterbody in reaching its Water Framework Directive objectives.

EIAR 1.3.2 National Policy Context**EIAR 1.3.2.1 The Climate Action and Low Carbon Development (Amendment) Act 2021**

The Irish government is creating and implementing policies and strategies to achieve its long-term goal of transitioning to a low-carbon, climate-resilient and environmentally sustainable economy by 2050 and also to advance progress and action in global climate ambition in accordance with Ireland's commitments at the COP meetings (Conference of the Parties of the United Nations Framework Convention on Climate Change).

A target of 70% electricity generation to come from renewable sources by 2030 was first set in the Government's White Paper 'Ireland's Transition to a Low Carbon Energy Future 2015 – 2030', which aimed to transform Ireland to a low carbon economy (Department of Communications, Energy & Natural Resources, 2015). A key measure of the Irish Government's 1st Climate Action Plan (2019) was to increase reliance on renewables for the generation of electricity (Renewable Electricity, RE-E) from 30% to 70% over the period 2021 to 2030, which required the addition of 12GW (gigawatt) of RE-E capacity (Government of Ireland, 2019).

The Climate Action and Low Carbon Development (Amendment) Act 2021 (the Climate Act) was approved by Government on 23rd March 2021. The Climate Act contains a National Climate Objective which commits the country to "*pursue and achieve, by no later than the end of the year 2050*" climate neutral status. Also under the Climate Act, there is due to be a reduction of 51% in the total amount of greenhouse gas emissions within 10 years, which represents a significant challenge.

Climate Action Plan 2023 (CAP23), was the first to be prepared under the Climate Act, following the introduction in 2022 of economy-wide carbon budgets and sectoral emissions ceilings. CAP23 set out how Ireland could accelerate the actions that are required to respond to the climate crisis, putting climate solutions at the centre of Ireland's social and economic development. Some key measures for the electricity sector in CAP23 were to;

- Increase the proportion of renewable electricity to 80% by 2030 by accelerating the delivery of onshore wind, offshore wind, and solar – and, relevant to Gathabawn Windfarm deliver up to 9GW onshore wind (with 6GW by 2025) Note: There are currently 4GW of on-shore wind installed in Ireland, so the 2030 target represents more than a doubling of capacity.
- Align the relevant constituent elements of the planning and permitting system to support accelerated renewable energy development and ensure renewables will be considered to be in the overriding public interest.

According to CAP23 the key measures "will not just reduce our emissions from electricity, it will allow us to electrify other sectors such as transport and heat and reduce our emissions in these sectors too. Achieving

further emissions reductions between now and 2030 requires a major step up in how we accelerate and increase the deployment of renewable energy to replace fossil fuels, deliver a flexible system to support renewables, and manage electricity demand” (Government of Ireland, 2022).

The current Climate Action Plan 2025 (CAP25) is the 4th annual update to Ireland’s Climate Action Plan. The Plan was published on 15 April 2025. According to the Gov.ie website⁴ the Plan lays out a roadmap of actions which will ultimately lead us to meeting our national climate objective of pursuing and achieving, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy. It aligns with the legally binding economy-wide carbon budgets and sectoral emissions ceilings that were agreed by Government in July 2022. The Plan provides a roadmap for taking decisive action to halve Ireland’s emissions by 2030 and achieve climate neutrality by no later than 2050, as committed to in the Climate Action and Low Carbon Development (Amendment) Act 2021.

Renewable electricity (RE-E) generated at Gathabawn Windfarm, will align with Ireland’s Climate Action Plan CAP25 and will contribute positively to the increasing imperative to ameliorate climate change by generating electricity without polluting greenhouse gas (GHG) emissions.

EIAR 1.3.2.2 Section 15 of The Climate Act

Section 15(1) of the Climate Action and Low Carbon Development Act 2015 (Climate Act) provides that

"A relevant body shall, 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 relevant body in this case is An Coimisiún Pleanála.

The remaining Sections 15(2) to 15 (5) relate to definitions, which I include below for completeness.

(2) The relevant Minister may, from time to time, give a direction to a relevant body requiring it to prepare, and submit to him or her, within such period as may be specified in the direction, a report specifying—

- a) the measures that the relevant body has adopted for the purposes of compliance by that relevant body with subsection (1), and
- b) the progress made by the relevant body in the performance of its functions in the manner referred to in that subsection.

(3) The relevant Minister may, from time to time, give a direction to a relevant body requiring it to adopt such measures as are specified in the direction for the purposes of compliance by the relevant body with subsection (1).

(4) A relevant body shall comply with a direction under this section.

(5) In this section—

⁴ <https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/climate-action-plan-2025/>

“Act of 2014” means the Freedom of Information Act 2014 ;

“prescribed body” has the same meaning as it has in the Act of 2014;

“public body” has the same meaning as it has in the Act of 2014;

“relevant body” means—

(a) a prescribed body, and

(b) a public body;

“relevant Minister” means, in relation to a relevant body that is—

(a) a public body—

(i) referred to in section 6(1)(a) of the Act of 2014, the Minister of the Government having charge of the Department of State concerned,

(ii) referred to in section 6(1)(b) of the Act of 2014, such Minister of the Government as the Government may designate in relation to that public body,

(iii) referred to in section 6(1)(c) of the Act of 2014 that was established or appointed by—

(I) the Government, such Minister of the Government as the Government may designate in relation to that public body, or

(II) a Minister of the Government, the Minister of the Government who established or appointed the public body concerned,

(iv) referred to in paragraph (d) or (e) of section 6(1) of the Act of 2014, such Minister of the Government as the Government may designate in relation to that public body,

(v) referred to in section 6(1)(f) of the Act of 2014, that is directly or indirectly controlled by—

(I) a public body to which subparagraph (ii) or (iv) relates, such Minister of the Government as the Government may designate in relation to that public body,

(II) a public body to which subparagraph (iii)(I) relates, such Minister of the Government as the Government may designate in relation to that public body, or

(III) a public body to which subparagraph (iii)(II) relates, the Minister of the Government who established or appointed the public body referred to in section 6(1) (c) of the Act of 2014,

(vi) referred to in section 6(1)(g) of the Act of 2014, the Minister for Education and Skills,

(vii) referred to in section 6(1)(h) of the Act of 2014 (other than a public body referred to in subparagraphs (i) to (iv)), such Minister of the Government as the Government may designate in relation to that public body, and

(viii) referred to in paragraph (a) or (b) of section 6(2) of the Act of 2014 (other than a public body referred to in subparagraphs (i) to (iv)), such Minister of the Government as the Government may designate in relation to that public body,

and

(b) a prescribed body, such Minister of the Government as the Government may designate in relation to that public body.

See <https://www.irishstatutebook.ie/eli/2015/act/46/section/15/enacted/en/html>

The following **Section 15 Report** is an analysis of how the proposed Gathabawn Windfarm is consistent with all aspects of each of the Plans, Strategy and Objectives listed in Section 15(1) (a) to (e) of the Climate Act.

Appendix 2.2 of the EIA Report Chapter 12; Climate also refers.

Table 1-3: Gathabawn Windfarm consistency with Section 15 of the Climate Act

Section	Climate Act Section 15(1)(a) – (e)										
15 (1) (a)	(a) the most recent approved climate action plan,	Climate Action Plan 2025 (CAP25) is the most recent approved climate action plan, last updated on 9 May 2025. CAP25 is the 2025 statutory annual update to Ireland's Climate Action Plan under the Climate Act. Aspects of CAP25 relevant to the Renewable Electricity Sector <u>Section 11. Electricity</u> – Key Targets (budget cap) Electricity Section Carbon Budget 1 (2021-2025): 40 MtCO₂eq Electricity Section Carbon Budget 2 (2026-2030): 20 MtCO₂eq These carbon budget caps to be achieved by (among other measures) through <table border="1"> <tr> <th>National Targets</th><th>2025</th><th>2030</th></tr> <tr> <td>Renewable Electricity Share</td><td>50%</td><td>80%</td></tr> <tr> <td>Onshore Wind</td><td>6 GW</td><td>9 GW</td></tr> </table> In 11.1 'State of Play' CAP25 states "The electricity sector has one of the smallest carbon budgets, with a ceiling of 40 MtCO₂eq for the first budget period (2021-2025), equating to an average of 8 MtCO₂eq. per annum and the steepest decline trajectory (-40%) across all sectors. This represents an immense challenge as the sector not only has a requirement to reduce emissions, but also to meet the increasing electricity demand required for our economy, ensuring the energy security of the State, and supporting those sectors which are decarbonising through electrification." In 11.2.1 'Progress on Actions' CAP25 states "Accelerate Renewable Energy Generation - 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." In 11.3 'Identifying Actions in the Electricity Sector' CAP25 states "The Accelerating Renewable Electricity Taskforce (ARET) was established to identify and prioritise the required policies to achieve our onshore renewable electricity targets. The ARET published its Implementation Plan in June [2024⁵], which sets out the roadmap for the actions to be taken in the near-term to help meet our 2030 targets."	National Targets	2025	2030	Renewable Electricity Share	50%	80%	Onshore Wind	6 GW	9 GW
National Targets	2025	2030									
Renewable Electricity Share	50%	80%									
Onshore Wind	6 GW	9 GW									

⁵ <https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/accelerating-renewable-electricity-taskforce/>

Section	Climate Act Section 15(1)(a) – (e)	
		The ARET Implementation Plan identified three pillars of renewables delivery. Under the Planning and Reporting pillar, the planning policy is to “<i>Ensure that the statutory planning policy hierarchy supports the delivery of the national renewable electricity targets for onshore wind and solar PV and effectively translates the national targets for same to the regional and local development plan tiers</i>”. Consistency of Gathabawn Windfarm with these CAP25 aspects - Aspects identified relate to i) the acceleration of the generation of electricity from renewable sources and in particular onshore wind energy; and ii) the prioritising of achieving renewable electricity capacity targets for onshore wind (9GW by 2030 – a doubling of current capacity). - Proposed Gathabawn Windfarm is a c.54MW capacity onshore windfarm which is predicted to produce 150 million kilowatt hours of renewable electricity per annum which will offset 38,250 tonnes of CO₂e per annum that would otherwise be emitted if these kWh were instead generated by gas, coal and oil. This is the equivalent to planting 31km² of forestry or of switching 22,238 cars from diesel to electric vehicle. The purpose of Gathabawn Windfarm is completely aligned with the CAP25 policy to achieve carbon budget targets through the increase in renewable electricity share of the national electricity output and to increase the installation of onshore wind capacity. Additional electricity generation from indigenous renewable sources will also support the challenge to meet the increasing electricity demand required for our economy, ensuring the energy security of the State, and supporting those sectors which are decarbonising through electrification. - Proposed Gathabawn Windfarm will also contribute to the acceleration and increased deployment of new renewable electricity generation capacity and related infrastructure because there are grid connection possibilities within a reasonable distance from the windfarm site at the Eirgrid Ballyragget Substation. Once the Planning Application is submitted and application will be made to Eirgrid to connect to Ballyragget Substation. - The proposed Gathabawn Windfarm is a renewable energy development the purpose of which is to generate renewable electricity from a renewable non-fossil resource and is compatible with the Renewable Energy Directive (RED III) to promote the generation of energy from renewable sources. - Gathabawn Windfarm is a renewable energy development for the purposes of the Irish Planning Code. In conclusion, based on the information provided in this Section 15 Report and in the planning application as whole, the foregoing analysis demonstrates that An Coimisiún Pleanála can be satisfied that, by granting permission for the proposed development, it would, in so far as practicable, be performing its functions in a manner consistent with Section 15 (1) (a).
15 (1) (b)	(b) the most recent approved national long	Ireland’s Long-term Strategy on Greenhouse Gas Emissions Reduction (the Strategy) published in April 2023 and last updated in August 2024, is the first long-term climate action strategy prepared under the Climate Act⁶. It is the most recent approved national long term climate action strategy.

⁶ <https://www.gov.ie/en/departments-of-climate-energy-and-the-environment/publications/long-term-strategy-on->

Section	Climate Act Section 15(1)(a) – (e)	
	term climate action strategy	Aspects of the Strategy relevant to Renewable Electricity Sector Extracts from Section 8. Pathways to Climate Neutrality by Sector - 8.1 Electricity <u>In S.8.1 'State of Play' the Strategy states:</u> In 2022, electricity accounted for 16.6% of Ireland's greenhouse gas (GHG) emissions. Approximately 60% of Ireland's electricity came from fossil fuel generation (oil, gas, peat and coal). Thirty-eight per cent (38.6 %) of Ireland's electricity was generated from renewable sources, with the majority of this through onshore wind generation. The Strategy states that electricity will be a key enabler in decarbonising of the economy, primarily through increased electrification of other sectors. To reach Ireland's climate neutral target, the electricity sector will need to deliver its own reduction in emissions and support the decarbonisation of the transport and built environment sectors. <u>In S.8.1 'Pathway to 2030' the Strategy states:</u> Under the sectoral emissions ceilings agreed by the Government on 28 July 2022, the electricity sector has been set a binding carbon budget of 60 MtCO₂ eq. over the period from 2021 to 2030, which corresponds with a 75% reduction in greenhouse gas emissions by 2030, relative to the baseline year of 2018. The Strategy states that Climate Action Plan 2024 (CAP24) provides an integrated energy strategy for achieving the ambitious emissions reductions required under the sectoral emissions ceiling for electricity. The central element of CAP24 (and the current CAP25), is to deliver 80% renewable electricity generation by 2030. This will involve a dramatic reduction in fossil fuel generation and increasing renewable electricity. Section 3.1 of CAP25 states <i>"CAP25 is to be read in conjunction with CAP24 and takes account of key developments in the policy and evidence base in the previous year... This is intended to facilitate a focus on the delivery of outstanding actions from CAP24"</i>. <u>In S.8.1 'Pathway to Climate Neutrality by 2050' the Strategy states:</u> Meeting Ireland's 2050 climate neutrality target will require full decarbonisation of the power sector. In order to achieve this, Ireland will need to achieve near zero emissions from 2035. One of the Key drivers of a pathway to 2050 carbon neutrality is a major shift to 80% renewables (incl. 14 GW wind, 8 GW solar). Regarding emission reduction measures and milestones to 2050, the Strategy states that the core measures necessary to deliver a net zero emissions electricity sector are to deliver significantly higher renewable power capacity mostly through onshore wind, offshore wind, and solar PV. To achieve the required increase in renewable electricity capacity, installation rates of wind and solar power will need to significantly accelerate. CAP24 (and CAP25) set a number of major milestones including to deliver total installed capacity of at least 5 GW of offshore wind capacity and 9 GW of onshore wind and 8GW of solar capacity by 2030.

Section	Climate Act Section 15(1)(a) – (e)	
		Consistency of the Proposed Gathabawn Windfarm with these Strategy aspects A grant of permission for Gathabawn Windfarm will increase renewable electricity capacity in the country. Gathabawn Windfarm is an onshore windfarm generating electricity from the power in the wind, which is a renewable resource. In conclusion, based on the information provided in this Section 15 Report and in the planning application as whole, the foregoing analysis demonstrates that the planning authority can be satisfied that, by granting permission for the proposed development, it would, in so far as practicable, be performing its functions in a manner consistent with Section 15 (1) (b).
15 (1) (c)	(c) the most recent approved national adaptation framework and approved sectoral adaptation plans	The most recently approved – National Adaption Framework (NAF) 2024 which was published on 5 June 2024⁷. Aspects of NAF 2024 relevant to Renewable Electricity Sector In NAF <u>Appendix 3: Sectoral impacts and opportunities of climate change</u>, the potential impacts on the Electricity and Gas Network, associated with Climate Change and relevant to onshore wind are listed as; • Floods may damage electricity and gas transmission systems, and coastal erosion could impact infrastructure. • Increased wind variability may require backup generation or storage, and strong winds may lead to turbine shutdown or damage. Additionally, NAF 2024 requires the development of Sectoral Adaptation Plans (SAPs), including for the Electricity and Gas Networks. The Electricity & Gas Networks Climate Change Sectoral Adaptation Plan (EGN SAP 2025) document was published in November 2025. The EGN SAP 2025 focuses on climate adaption. Relevant to on-shore windfarms, risks were identified for the electricity generation subsector, including • disruption to electricity generation and damage to assets is associated with extreme winds. • periods of extreme temperature have coincided with decreased wind energy output during the hot, calm weather • windstorms have resulted in damage to the electricity distribution network (e.g. overhead lines and poles). Proposed Gathabawn Windfarm in relation to NAF 2024 and EGN SAP 2025 The vulnerability of Gathabawn Windfarm to natural disasters and climate change is evaluated in <u>EIAR Chapter 19: Vulnerability to Major Accidents, Natural Disasters and Climate Change</u>. The evaluation is carried out in accordance with Department of the Environment, Heritage & Local Government (2010) <i>A Guide to Risk Assessment in Major Emergency Management</i> and taking account of Tii <i>Climate Guidance for National Roads, Light Rail, and Rural Cycleways (Offline & Greenways) - Overarching Technical Document</i> (PE_ENV-01104 December 2022).

⁷ <https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/national-adaptation-framework-naf/>

Section	Climate Act Section 15(1)(a) – (e)	
		It is evaluated that; - the likelihood of the Gathabawn Windfarm project being affected by flooding or extreme rainfall events or causing flooding to occur, is considered to be <u>Extremely Unlikely</u>. The windfarm site is not in a mapped fluvial or pluvial flooding zone and the windfarm drainage system is designed to cater for high volumes of rainwater runoff. - the likelihood of the Gathabawn Windfarm project being affected by storms is considered to be <u>Extremely Unlikely</u>. The turbines will be designed in accordance with the IEC 61400 standard to ensure the structures are appropriately engineered against damage from hazards (including high winds) during the planned lifetime of the structures. In addition, before installation, the turbine suppliers will also carry out computerised wind flow models of the Gathabawn site, to ensure turbulence and fatigue loading is not exceeded. - Regarding the requirement for backup storage, Gathabawn Windfarm will likely connect directly into a 110kV Transmission node at Eirgrid Ballyragget Substation. In response to unexpected events related to climate extremes, which may result in temporary turbine shutdown at Gathabawn Windfarm, the Transmission System has capacity to bring compensatory generation online (spinning reserve) at short notice. Spinning reserve is a critical part of the normal operating Transmission System which must continuously adapt to drops in supply or to surges in demand. Mitigating Aspects for Gathabawn Windfarm in the context of the NAF 2024 and EGN SAP 2025 Gathabawn Windfarm will likely connect to the 110kV transmission network at Eirgrid Ballyragget Substation. There are 3 No. large solar farms recently constructed in the vicinity of Ballyragget/Parksgrove which are also connected to the Eirgrid Ballyragget Substation. These will provide an alternative source of generation at the Ballyragget node during periods of high pressure when solar gain is high at the solar farms and lack of wind would limit wind generation. The Beaufort Scale classes a Force 12 storm with speeds in excess of 32m/s (or in excess of 117km/h) as Hurricane Force. The wind turbines which will be installed at the Gathabawn Windfarm site will be designed to withstand at least 60 m/s (215km/h). The windfarm cabling (including the grid connection cabling) will not be affected by storms, because the cables will be placed underground. Also the type of electrical apparatus and equipment which will be installed at both the new substation at Parksgrove and the Eirgrid Ballyragget Substation is designed to withstand exposure in the open countryside which will mitigate the supply impacts of extreme weather. In conclusion, based on the information provided in this Section 15 Report and in the planning application as whole, the foregoing analysis demonstrates that An Coimisiún Pleanála can be satisfied that, by granting permission for the proposed development, it would, in so far as practicable, be performing its functions in a manner consistent with Section 15 (1) (c).

Section	Climate Act Section 15(1)(a) – (e)	
15 (1) (d)	(d) the furtherance of the national climate objective	The National Climate Objective is a legal commitment in the Climate Act to transition to a climate-resilient, biodiversity-rich, environmentally sustainable, and climate-neutral economy by the end of 2050. This is supported by an interim target of a 51% reduction in greenhouse gas emissions by 2030 and a system of 5-year, economy-wide carbon budgets to guide this process. A grant of permission for Gathabawn Windfarm would be consistent with the furtherance of the national climate objective. As stated at 15 (1) (b) above “A grant of permission for this renewable energy project would be consistent with the furtherance (<i>the process of helping something to develop, progress or advance</i>) of the national climate objective to transition to a carbon neutral economy by 2050. A grant of permission will ensure that a windfarm will be built and will contribute to a reduction in emissions from the generation of electricity in the country. Based on the energy intensity of the Irish electricity generation mix, Gathabawn Windfarm is predicted to directly offset 38,250 tonnes of CO₂eq per annum through the avoidance of electricity being generated from fossil fuels. In conclusion, based on the information provided in this Section 15 Report and in the planning application as whole, the foregoing analysis of Section 15, demonstrates that An Coimisiún Pleanála can be satisfied that, by granting permission for the proposed development, it would, in so far as practicable, be performing its functions in a manner consistent with Section 15 (1) (d).
15 (1) (e)	(e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State	A grant of permission for Gathabawn Windfarm would be consistent with the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State. The <i>raison d'être</i> of Gathabawn Windfarm is the mitigation of greenhouse gas (GHG) emissions, through the generation of electricity from clean resources. Every kWh of electricity generated by a wind turbine without the emission of GHGs, offsets the generation of a kWh of electricity from fossil fuels which do emit GHGs. More than 60% of all greenhouse gases currently emitted are linked to the energy sector (United Nations 2020), making it the single most important sector to focus on, to combat climate change. Currently, only around 34% percent of the world’s electricity generation is derived from renewable sources (Source: Global Energy Review 2026 (IEA)). To limit global warming to 1.5°C above pre-industrial levels, the share of renewables in the electricity mix must increase to 70-85% by 2050 (Intergovernmental Panel on Climate Change (IPCC) 2018). A rapid transformation away from fossil energy sources to renewables such as wind is pivotal if we are to meet the ambitions of the United Nations Framework Convention on Climate Change Paris Agreement. Life Cycle Emissions from windfarms Additionally, GHG emissions produced during the life cycle of turbines of the size proposed, will be offset by the renewable electricity generated during the first 8 months of the operational phase of the windfarm. Lifecycle assessment (LCA) are undertaken by wind turbine manufacturers – e.g. Enercon, Nordex and Vestas, who prepare Sustainability Reports and LCA for each of their wind turbine models. The LCAs establish the potential CO₂eq emitted for the kWhs delivered to the grid over an operating lifespan of 20 years (25 years for Enercon) and the potential payback period from the production of renewable electricity over the

Section	Climate Act Section 15(1)(a) – (e)	
		same period. A full life cycle includes raw materials, component production, the construction phase including access roads and turbine foundations, servicing/maintenance during the operational lifetime including component replacement and decommissioning of the plant after 20/25 years. The Vestas V136 fits the turbine dimensions in this application. The calculation of energy neutrality is based on an annual production of 150 million kWh produced per annum by the 12 turbines. According to the Vestas V136 LCA, the Vestas V136 will cause the emission of 5.6g of CO₂.eq per kWh delivered to the grid over 20 years and, assuming a production 3,000 million kWh over 20 years, this will result in the turbines being energy neutral within 8 months. See Reference List at the end of the Climate Chapter 12 of this EIAR for LCA sources. Other environmental indicators assessed as part of the LCA for the V136, include return-on energy of the windfarm. Return-on energy provides an indication of the energy balance of the turbines, showing the relationship between the electrical energy output from the turbines and the energy requirement over the whole life cycle of the turbines (i.e. to manufacture, operation and disposal). The payback period is measured in months. Over the life cycle of the predicted production from the turbines at Gathabawn Windfarm, the turbines will return 44 times more energy back than consumed over the turbine life cycle. Additionally, the overall recyclability of the modern multi-megawatt wind turbines is c.87%. The components contributing primarily to recyclability relate to metal parts manufactured from iron, steel, aluminium and copper, where the turbine consists of around 90% metal. This high recyclability percentage will contribute to the circular flow of material resources at disposal, following decommissioning. Adaptation to the effects of climate change Given the location of typical onshore and offshore windfarm sites, wind turbines have been developed to withstand and produce energy under extreme weather conditions. This development has continued for the past 40 years as larger turbines are introduced, and grid integration has become ever more critical as more variable power like wind power, comes online. All the main turbine manufacturers quality test against climate variables such as extreme winds, drought length, extreme rainfall, sea level rises, heating and cooling, subsidence and flooding. Recommended materiality thresholds are set for each variable. Ireland's weather because of our geographical position and temperate climate would expect to be moderate within these variables, albeit experiencing more extreme events occasionally. The most likely extreme events in Ireland would be flooding from extreme rainfall and subsidence in areas with steep slopes where rock meets the surface and peat covers the terrain. Extreme winds are also likely events. The primary mitigation measure for Gathabawn Windfarm to account for the effects of extreme weather causing subsidence or flooding, is the choice of the location for the windfarm. The Gathabawn Windfarm site was deemed suitable in the context of flooding because the site is not in a mapped fluvial or pluvial flooding zone. Regarding subsidence, site visits and trial hole investigations at Gathabawn found that there is no peat on-site and there were no evidence of slope failures or signs of instability noted at

Section	Climate Act Section 15(1)(a) – (e)	
		the proposed infrastructure locations during the site reconnaissance by Authors of the Appendix 7.3 Geotechnical Assessment Report. The primary mitigation measure for Gathabawn Windfarm to account for the effects of extreme winds is the choice of turbine technology for the site. The turbines to be installed at Gathabawn Windfarm will be designed in accordance with the IEC 61400 standard to ensure the structures are appropriately engineered against damage from hazards (including high winds) during the planned lifetime of the structures. Before installation, turbine manufacturers also carry out computerised wind flow models of the windfarm site to ensure turbulence and fatigue loading is not exceeded. In January 2025, Storm Éowyn brought the strongest winds ever recorded in Ireland with gusts up to 184 km/h breaking an 80-year old record. Éowyn joins the list of storms that have observed Hurricane Force 12 wind speeds on land in Ireland, such as the ‘Night of the Big Wind’ storm in January 1839 (estimated wind speeds of 100 knots, Debbie in September 1961 (gusts up to 181 km/h), and more recently Darwin in February 2014 (gusts up to 159 km/h). During Éowyn, Ireland observed its highest sustained and gust wind speeds on record (142km/h and 184 km/h respectively). The Beaufort Scale classes a Force 12 storm with speeds in excess of 32m/s (or in excess of 117km/h) as Hurricane Force. The wind turbines which will be installed at the Gathabawn Windfarm site will be designed to withstand at least 60 m/s (215km/h). It is concluded in EIAR <u>Chapter 19 Vulnerability to Major Accidents, Natural Disasters and Climate Change</u> that the likelihood of the Gathabawn Windfarm project being affected by or causing, flooding or landslip or being affected by storms is considered to be Extremely Unlikely. In conclusion, based on the information provided in this Section 15 Report and in the planning application as whole, the foregoing analysis demonstrates that An Coimisiún Pleanála can be satisfied that, by granting permission for the proposed development, it would, in so far as practicable, be performing its functions in a manner consistent with Section 15 (1) (e).
		Overall, based on the above analysis of the different aspects of the statutory obligations under Section 15, it is considered that a grant of permission for the proposed development would be in compliance with An Coimisiún Pleanála’s obligations under Section 15 as a whole.

EIAR 1.3.2.3 National Planning Framework: Project Ireland 2040

The National Planning Framework (NPF): Project Ireland 2040, forms the top tier of the national planning policy structure which establishes the policy context for the Regional Spatial and Economic Strategies (RSES) and local level development plans.

National Strategic Outcome No. 8 of the NPF seeks to transition Ireland to a low carbon and climate resilient society. This reflects the policy ethos established at the European level of governance (e.g. climate change and renewable energy targets). Ireland must reduce greenhouse gas emissions from the energy sector by at least 80% (compared to 1990 levels) by 2050, while ensuring security of supply of competitive energy sources.

Ireland's national energy policy is focused on three pillars:

1. Sustainability,
2. Security of supply, and
3. Competitiveness.

The transition to a low carbon energy future requires a shift to predominantly renewable energy. Policy Objective No. 55 promotes renewable energy use and generation at appropriate locations within the built and natural environment to meeting national objectives towards achieving a low carbon economy by 2050.

The NPF emphasises that rural areas have a strong role to play in securing a sustainable renewable energy supply for the country and acknowledges that "rural areas have significantly contributed to the energy needs of the country and continue to do so".

Additionally, National Policy Objective No. 54 seeks to reduce our carbon footprint by integrating climate action into the planning systems.

The provision of new renewable electricity generation at Gathabawn Windfarm, is in line with the aims and objectives of Project Ireland 2040 the National Planning Framework, which seeks to transition to a low carbon and climate resilient economy.

EIAR 1.3.2.4 National Development Plan 2021-2030

The National Development Plan 2021 – 2030 (NDP) sets out the major public investment projects which are to play a significant role in addressing the opportunities and challenges faced by Ireland over the coming years such as housing, health, population growth, and most relevant to the proposed development, climate change. The NDP notes that the Irish Government is fully committed to playing its part to ensure that the worst climate change damage can be avoided, e.g. significant reductions in CO₂ and other greenhouse gas emissions, as assisted by the achievement of both European and national renewable energy targets.

Chapter 13 deals with NSO 8 Transition to a Climate-Neutral and Climate Resilient Society. Sectoral Strategies – Energy; specifically, the NDP commits to increasing the share of renewable electricity (RE-E) up to 80% by 2030, supporting a reduction in greenhouse gas emissions by 2030.

Gathabawn Windfarm will support the priorities of the National Development Plan 2021-2030 by providing RE-E from wind energy to the national grid, supporting the achievement of a low-carbon and resilient Irish electricity system.

EIAR 1.3.2.5 Energy Security**EIAR 1.3.2.5.1 Energy Security in Ireland to 2030, Energy Security Package (November 2023)**

The Energy Security in Ireland to 2030 document confirms that Ireland's future energy will be secured by moving to an electricity-led system maximising our renewable energy potential.

EIAR 1.3.2.5.2 National Energy Security Framework (April 2022)

The Framework addresses Ireland's energy security needs in the context of the war in Ukraine. It coordinates energy security work across the electricity, gas and oil sectors. The Framework takes account of the need to decarbonise society and the economy, and of targets set out in the Climate Action Plan to reduce emissions.

Theme 3 - Reducing our Dependency on Imported Fossil Fuels, focusses on three areas of work:

1. Reducing demand for fossil fuels.
2. Replacing fossil fuels with renewables, including solar energy.
3. Diversifying fossil fuel supplies.

Under area 2, the Framework notes that prioritising renewables is in line with the requirements of the recast Renewable Energy Directive and the EC REPowerEU action statement. The Commission has called on Member States to ensure that renewable energy generation projects are considered to be in the overriding public interest, and the interest of public safety, and the Irish Government supports this request.

Responses include No.25: Align all elements of the planning system to fully support accelerated renewable energy development.

EIAR 1.3.2.5.3 Policy Statement on Security of Electricity Supply (November 2021)

This states that the Programme for Government requires a 51% reduction in greenhouse gas emissions by 2030 and that 80% of electricity consumption will come from renewable sources by 2030. Ensuring energy security is a national priority, as the electricity system decarbonises towards net zero emissions.

Gathabawn Windfarm will support the Framework's intentions to reducing demand for fossil fuel and replace fossil fuels with renewables.

EIAR 1.3.2.6 The Fourth National Biodiversity Action Plan 2023-2030

The National Biodiversity Action Plan (NBAP) includes five strategic objectives aimed at addressing existing challenges and new and emerging issues associated with biodiversity loss.

Section 59B(1) of the Wildlife (Amendment) Act 2000 (as amended) requires public bodies, to have regard to the objectives and targets of the NBAP in the performance of its functions.

The NBAP five Objectives are as follows:

1. Adopt a whole-of-government, whole-of-society approach to biodiversity
2. Meet urgent conservation and restoration needs;
3. Secure nature's contribution to people;
4. Enhance the evidence base for action on biodiversity; and
5. Strengthen Ireland's contribution to international biodiversity initiatives.

The EIA Report and AA Report for the Gathabawn Windfarm development examines the impact of the development on biodiversity, including species and habitats, having regard to the Habitats and Birds Directives, Environmental Impact Assessment Directive, Water Framework Directive and other relevant European, National and Local legislation, strategy and policy on the protection of biodiversity.

EIAR 1.3.2.7 Wind Energy Development Guidelines 2006

In 2006, the Department of the Environment, Heritage and Local Government (DoEHLG) published 'Wind Energy Development Guidelines for Planning Authorities' (WEDG 2006) to provide statutory guidance for wind energy development, including consideration of environmental issues, such as noise and shadow flicker, design, siting, spatial extent and scale, cumulative effect and spacing, as well as the layout and height of wind turbines having regard to the landscape and other sensitivities. Planning authorities must have regard to the Guidelines on planning for wind energy through the development plan process and in determining applications for planning permission. The guidelines are intended to ensure a consistency of approach throughout the country in the identification of suitable locations for wind energy projects and in the treatment of planning applications for wind energy developments. At the time of the writing of this EIA Report, the WEDGs 2006 were the current guidelines.

The Wind Energy Development Guidelines 2006 siting and design considerations set out in Chapter 6. Section 6.9.2 for Hilly and Flat Farmland, were taken into account during the design stage of Gathabawn Windfarm. The final design is compatible with these guidelines.

EIAR 1.3.2.7.1 Draft Revised Wind Energy Development Guidelines 2019

The review of the Wind Energy Development Guidelines 2006 began in December 2013. Following consultation, a preferred draft approach was announced in 2017. The Draft Revised Wind Energy Development Guidelines were issued for public consultation in December 2019 and the consultation concluded in February 2020. These Draft Guidelines are still under review particularly the noise aspects of the draft, and until such time as the new guidelines are published, the 2006 guidelines remain the statutory policy guide in relation to all wind energy developments.

The Draft Revised Wind Energy Development Guidelines 2019 siting and design considerations set out in Chapter 6. Section 6.10.2 for Hilly and Flat Farmland are the same as in the 2006 Guidelines and as such the final design of Gathabawn Windfarm is compatible with these guidelines.

EIAR 1.3.3 Regional Policy Context**EIAR 1.3.3.1 Southern Regional Assembly Regional Spatial & Economic Strategy**

The Southern Regional Assembly was established in 2015, the Regional Spatial and Economic Strategy (RSES) for the Southern Region (Carlow, Clare, Cork, Kerry, Kilkenny, Limerick, Tipperary, Waterford and Wexford) came into effect on 31st January 2020. The RSES provides a long-term, strategic development framework for the future physical, economic and social development of the Southern Region. The RSES seeks to achieve balanced regional development and full implementation of Project Ireland 2040 – the National Planning Framework.

The RSES sets out a number of Regional Policy Objectives (RPOs) (Southern Regional Assembly, 2020) designed to facilitate greater integration of renewables into the national grid. The RSES notes that there is significant potential to use renewable energy across the Southern Region to achieve climate change emission reduction targets. As such, the RSES supports renewable projects such as the proposed development, per;

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 Plans. 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 offshore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.

RPO 100 (Indigenous Renewable Energy Production and Grid Injection) It is an objective to support the integration of indigenous renewable energy production and grid injection.

The RSES sets out a number of infrastructural RPOs, relevant to the proposed development, which indicate that the Southern Region is open to, and ready to invest in, renewable energy generation, including;

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 (c) (Renewable Energy Generation and Transmission Network): The RSES supports the Southern Region as a Carbon Neutral Energy Region.

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

Gathabawn Windfarm as an electricity generator from renewable resources in County Kilkenny, is compatible with the Regional Policy Objectives of the Regional Spatial and Economic Strategy for the Southern Region (2020).

EIAR 1.3.4 Local Policy - Kilkenny City and County Development Plan 2021-2027**EIAR 1.3.4.1 Climate Action Policy in KCCDP (Chapter 2)**

The Kilkenny City & County Development Plan (KCCDP) 2021-2027 Volume 1, provides for the development of indigenous energy resources, with an emphasis on renewable energy supplies. The Plan acknowledges the importance of renewable energy in reducing anthropogenic greenhouse gas emissions and the contribution of renewable energy in achieving national and EU target of net zero greenhouse gas emissions by 2050.

Climate change mitigation and adaptation objectives have been incorporated into the policies of the KCCDP, to ensure that climate change action has been consistently integrated into the policy themes addressed by the KCCDP.

Volume 1: Chapter 2 sets out a number of Strategic Objectives relating to Climate Action including the following:

2B To support the implementation of the National Climate Action Plan and the National Climate Action Charter for Local Authorities, and to facilitate measures which seek to reduce emissions of greenhouse gases by embedding appropriate policies within the Development Plan.

2E To ensure that the Development Plan transposes, supports and implements strategic objectives of the National Planning Framework and the Southern Regional Spatial and Economic Strategy to create an enabling local development framework that: (a) promotes and integrates important climate considerations in local development and the assessment of planning applications and (b) supports the practical implementation of national climate policy and targets to assist in the delivery of the national transition objective.

EIAR 1.3.4.2 Renewable Energy Policy in KCCDP (Chapter 11)

KCCDP Chapter 11: Renewable Energy sets out the policy context for all renewables, wherein it is acknowledged that Ireland and Kilkenny have excellent renewable energy (RE) resources, which will be a critical and growing component of Irish energy supply in the future.

It is the Strategic Aim of Chapter 11 to set a clear, ambitious target for renewable energy:

Chapter 11; Strategic Aim: To generate 100% of electricity demand for the County through renewables by 2030 by promoting and facilitating all forms of renewable energies and energy efficiency improvements in a sustainable manner as a response to climate change in suitable locations, having due regard to natural and built heritage, biodiversity and residential amenities.

In this regard, it is Objective 11A to;

Objective 11A: To support and facilitate the provision of energy in accordance with Ireland's transition to a low carbon energy future by means of the maintenance and upgrading of electricity and gas network grid infrastructure and by integrating renewable energy sources and ensuring our national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grows over the period of the Plan.

Gathabawn Windfarm is compatible with the Strategic Aim to generate 100% of electricity demand from renewables by 2030 and supports the Objective to integrate renewable energy sources and ensuring our energy system remains safe, secure and ready to meet increased demand.

According to the Climate Change Advisory Council (Working Paper No. 16 May 2023) it is estimated that by 2030, County Kilkenny will use 633 Gigawatt hours (GWh) of electricity. The latest figures from Wind Energy Ireland, show that Kilkenny generated 107GWh of electricity in 2025 from wind turbines located in the County (WEI website accessed 21/08/2026). Gathabawn Windfarm will deliver an estimated 150 GWh per

annum of renewable electricity to assist in reaching the KCCDP Strategic Aim target and the Objective to increase production.

EIAR 1.3.4.3 KCCDP Locational Requirements for Wind Energy Developments

Section 11.5 of KCCDP relates to policy on Wind Energy, wherein it states that “All planning applications for wind energy developments shall be assessed against the DEHLG’s Wind Energy Development Guidelines, 2006, (and any revisions thereof) and the County Council’s Wind Strategy.” The County Council’s Wind Strategy comprises **Appendix K. Wind Energy Development Strategy of the KCCDP**.

Section 11.5.2 describes the development of that Wind Energy Development Strategy. In summary it states that the wind energy strategy has been developed for the current KCCDP building on the strategies from previous County Development Plans and having regard to Government policy generally and the Draft Revised Wind Energy Development Guidelines. It states that in accordance with the Wind Energy Development Guidelines, the Planning Authority undertook a 4-step process for identifying suitable locations for wind energy generation.

The four steps are set out below;

1. Assess wind area potential using SEAI’s Wind Atlas for Ireland.
2. Utilise a landscape character assessment and the potential sensitivity of the landscape for wind energy developments
3. Do a multi criteria or sieve analysis by overlaying the wind energy mapping and landscape Sensitivity
4. Integrate the information which derived from the previous steps with information regarding accessibility to electricity transmission and distribution grids.

EIAR 1.3.4.4 Kilkenny Wind Energy Development Strategy 2021 (Appendix K of KCCDP)

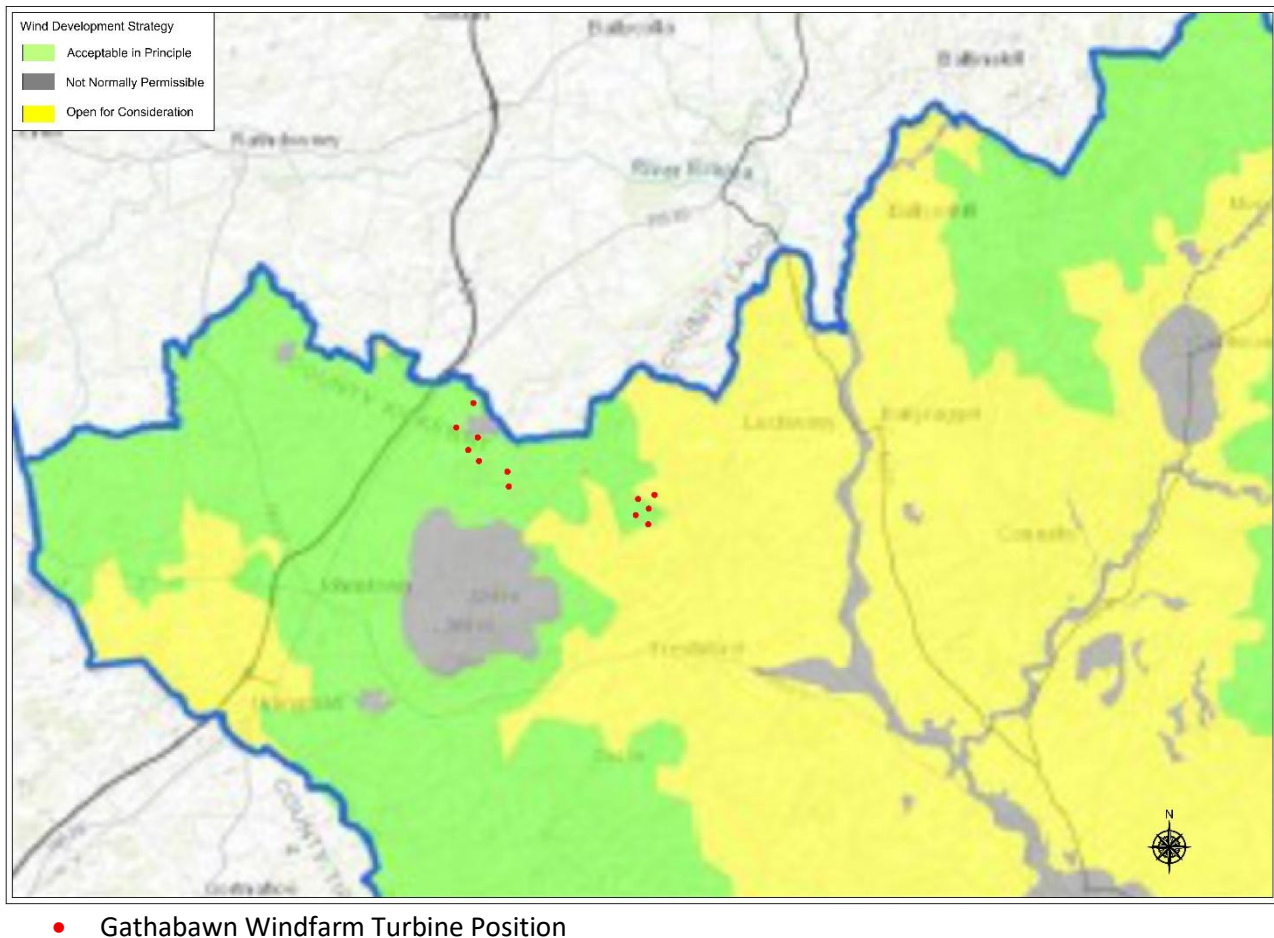
The Council’s Wind Energy Development Strategy (Appendix K of the KCCDP) identifies 3 No. Strategy areas in the County, these are;

1. Acceptable in Principle
2. Open for Consideration
3. Not normally acceptable.

In summary, the Wind Energy Development Strategy identifies key areas where there is significant wind energy potential and grid connection capacity, where - subject to criteria such as design and landscape planning, natural heritage, environmental and amenity considerations - wind energy development will be either acceptable, open for consideration or not permissible. These strategy areas are shown on Figure 8: Wind Strategy Areas in Appendix K: Kilkenny Wind Energy Development Strategy 2021 of the KCCDP.

Gathabawn Windfarm (red dots) is within an area on Figure 8 where wind energy developments are considered ‘Acceptable in Principle’ and where the Development Strategy states that Acceptable in Principle areas are “preferred area for wind energy development, characterised by high wind speeds, and no significant conflict with environmental designations or sensitivities”.

Figure 8: Wind Development Strategy in KCCDP Appendix K: Kilkenny Wind Energy Development Strategy 2021



During the preliminary alternative site investigations carried out for the preferred location for Gathabawn Windfarm and guided by the County's Wind Energy Development Strategy, it was established that the Gathabawn Windfarm site was a suitable location because

1. The site has an adequate wind resource for a viable windfarm due to the extent of the elevated area above surrounding topography.
2. The site is compatible with the County Landscape Assessment characterisation as an Upland Landscape Character Type where the relevant Development Management requirement, taking into account Landscape Character Sensitivity (Section 9.2.12.5 KCCDP) is *"To facilitate, where appropriate, developments that have a functional and locational natural resource requirement to be situated on steep or elevated sites (e.g. reservoir, telecommunications or wind energy structures) with reference to the appropriate County strategies currently in place, and to ensure that any residual adverse visual impacts are minimised or mitigated"*.
3. The site does not include ecological sensitivities having no European Designated Sites within the site boundary i.e. Special Areas of Conservation (SAC) or Special Protection Areas (SPA).
4. There is adequate grid capacity in the vicinity i.e. at Eirgrid Ballyragget Substation.

EIAR 1.3.4.5 Renewable Energy Chapter 11 of KCCDP

In Chapter 11: Renewable Energy of the KCCDP, the potential for these Wind Energy Development Strategy areas to absorb a variety of projects, ranging from large scale wind farm projects to relatively small-scale wind energy.

The policy approach is set out in Chapter 11: Table 11.3: Wind Energy Strategy Areas – policy approach;

Table 11.3: Wind Energy Strategy Areas – policy approach			
Project Category	Acceptable in Principle	Open for Consideration	Not normally permissible
Individual Category	✓	✓	✓
Auro producer	✓	✓	✓
Small scale wind farm/ Community led initiative	✓	✓	X
Large scale wind farm	✓	X	X

The proposed Gathabawn Windfarm is a large-scale windfarm.

The KCCDP Policy is expressed in Section 11.5.2

“ (d) Large-Scale Wind Energy Developments (>5MW)

Large-scale wind energy developments will, in usual circumstances, only be considered in ‘Acceptable in principle’ areas. The rationale behind this policy is to minimise the visual impacts of such large-scale developments, in addition to effects on the environment of County Kilkenny as a whole, as well as to facilitate appropriate grid connections. These will be assessed in accordance with the Wind Energy Development Guidelines.”

Section 11.5.3 Development Management Guidance for the Wind Energy Development Strategy Areas includes “*All planning applications for wind energy developments shall be assessed against the DEHLG’s Wind Energy Development Guidelines, 2006, (and any subsequent update of these guidelines) and the County Council’s Wind Strategy*”.

The location of *Gathabawn Windfarm* is compatible with the County Council’s Wind Energy Development Strategy as expressed in Appendix K of the KCCDP.

Also, according to the competent expert who prepared the landscape chapter for this EIA Report, the location of Gathabawn Windfarm is also compatible with the Wind Energy Development Guidelines (2006) which provide guidance on windfarm siting and design criteria for a number of different landscape types. The landscape expert considers that the site of the proposed Gathabawn Windfarm development is within a landscape that is generally consistent with the ‘Hilly and Flat Farmland’ landscape type described in the Wind Energy Development Guidelines and therefore the associated guidance is applicable. Overall, it is considered that the Proposed Development design, particularly the ridgetop turbine arrangement, is fully in accordance with the guidance for this landscape setting. Even in respect of turbine height, which the guidance states would; “*tend not to be tall*” is acceptable because of the exception made for ridgelines of a relatively large scale and the fact that these are not tall turbines by current standards.

(Section EIAR 14.3.2.1 Landscape Chapter 14).

EIAR 1.3.4.6 Changes to the KCCDP 2021-2027 Wind Strategy Areas

The locations of the wind energy development strategy areas are identified on Figure 11.4: Wind Strategy Areas of Chapter 11 and on Figure 8: Wind Strategy Areas in Appendix K: Kilkenny Wind Energy Development Strategy 2021 of the KCCDP.

The wind strategy areas, were modified prior to the adoption of the KCCDP, changing the status of certain areas in the south of the County from 'Acceptable in Principle' to 'Open for Consideration' or 'Not normally permissible'. The Gathabawn Windfarm location strategy area designation was not changed – the area was Acceptable in Principle for wind energy developments in the Draft Plan and Wind Energy Development Strategy and in the finally Adopted Plan and Strategy.

The Kilkenny City & County Development Plan 2021-2027 was adopted, on 3rd of September 2021. On 15th October 2021, the Minister of State at the Department of the Housing, Local Government and Heritage, consequent to a recommendation made to him by the Office of the Planning Regulator notified Kilkenny County Council of his intention to issue a Direction to the Kilkenny City and County Development Plan 2021-2027. The Draft Direction states that those parts of the Kilkenny City and County Development Plan 2021-2027 Chapter 11 referred to in the notice shall not have effect namely Section 11.4 Kilkenny Targets, Section 11.5.1: Current status and targets; and Figure 11.4: Wind Strategy Areas. The final Ministerial Direction has not been issued to date (February 2025).

The locational compatibility of the Gathabawn Windfarm with the policies of the KCCDP is not reliant on either Section 11.4; Section 11.5.1; on the identification of the strategy areas on Figure 11.4 or on Figure 8 of the Kilkenny Wind Energy Development Strategy 2021 Appendix K of the adopted KCCDP.

The proposed windfarm development is compatible with the Climate Change (Chapter 2) and Renewable Energy (Chapter 11) Strategic Aims of the KCCDP because the proposed windfarm renewable electricity generation of 150GWh per annum, will contribute to the delivery on the obligations of the State to transition to low carbon and climate resilient society and to promote and facilitate all forms of renewable energies in a sustainable manner.

EIAR 1.3.4.7 Assessment and Development Requirements for Wind Energy

Section 11.5.3. of KCCDP Chapter 11: Renewable Energy sets out a full suite of guidance on the requirements for wind energy development applications and developments in the County – KCCDP Section 11.5.3.1 to Section 11.5.3.12 refers.

KCCDP Section 11.5.3.1 Environmental Assessments sets out the requirements for any EIA Report and Appropriate Assessment Reporting to be submitted with the application. Construction Environment Management Plans are also required to be submitted with the application.

Action: For the Gathabawn Windfarm project, the EIA Report and Appropriate Assessment Reporting submitted with this application complies with the EIA Directive, the Habitat Directive and the Birds Directive. The assessments relate to all mandatory categories and includes both the windfarm and candidate grid connection. Mitigation Measures are assessed as an integral part of the development. Construction Environment Management Plans have been submitted with the application including Surface Water Management Plan, Fuel Management Plan, Waste Management Plan, Traffic Management Plan, including Road Safety and Courtesy Protocol, Dust Minimisation Plan, Revegetation and Reinstatement Plan, Ecological Management Plan, Invasive Species Management Plan, Construction Methodologies and Emergency Response Plan.

KCCDP Section 11.5.3.2 Pre-planning and public consultation states that consultation with the local population is required prior to the submission of the application.

Action: Pre-application consultations have been conducted with the local landowners and the local community. There was a mailshot with information on the proposal sent to all houses within 2km of a turbine location prior to the lodgement of the Application. A community website was also set up prior to lodgement, which contains details of the proposal in non-technical language and details of the community benefit scheme attaching to the proposed windfarm. Contact email details are also provided on the website for the Gathabawn Windfarm Community Liaison Officer. See also Chapter 4: Consultation of this EIA Report and the Community Report.

KCCDP Section 11.5.3.3 Impact on the Landscape describes the methodology to be used to estimate the potential for Landscape impact and states that all applications shall be accompanied by a Landscape Impact Assessment Report, as set out in Appendix 3 of the Wind Energy Development Guidelines, and any revisions thereof.

Action: The application is accompanied by a Landscape and Visual Impact Assessment (LVIA) compiled in accordance with the Wind Energy Development Guidelines and including photomontage visualisations and assessments from 37 No. Viewpoints. Consideration has been given to landscape sensitivity, visual presence, aesthetic impact and significance of the impact which is compatible with the methodology set out in KCCDP Section 11.5.3.3. See Chapter 14: Landscape of this EIA Report.

KCCDP Section 11.5.3.4 Noise Impact Assessment and Noise Limit requires that noise modelling is submitted with any application for wind energy developments and that this modelling should include noise characteristics associated with both the wind turbines and any associated infrastructure such as transformers, sub-stations or any other ancillary equipment.

Action: Noise modelling has been carried out for the proposal. Mitigation measures have been incorporated into the design to ensure that the proposal complies with whatever limits are imposed by planning condition. See Chapter 10: Noise & Vibration of this EIA Report.

KCCDP Section 11.5.3.5 Shadow Flicker describes shadow flicker and requires that “a Shadow Flicker study detailing the outcome of computational modelling for the potential for shadow flicker from the development should accompany all planning applications for wind energy development and suitable mitigation will be required”.

Action: A Shadow Flicker Study detailing the computational modelling for the potential for shadow flicker from the development and mitigation measures to control shadow flicker, are set out in Chapter 11: Shadow Flicker of this EIA Report.

Section 11.5.3.6 Natural Heritage requires that natural heritage (birds or rare flora, mammals, amphibians and fish) is assessed. Also, it states that registered thoroughbred stud farms are considered to be a noise and flicker sensitive properties.

Action: The impacts on natural heritage is assessed in Chapter 13 Biodiversity of the EIA Report. The nearest registered thoroughbred stud farm is over 20km from the windfarm site and as such well beyond the study area for noise and shadow flicker effect.

Section 11.5.3.7 Access to grid recommends that details of consultations with the electricity transmission operators regarding the nature and location of a proposed grid connection should be submitted as part of the pre-planning consultation.

Action: The developer consulted publicly available information from EirGrid sources on the national grid, to assess the grid connection capacity locally. Alternative grid connection location possibilities were investigated. Ballyragget Eirgrid Substation was chosen as the most suitable grid connection point (See Chapter 3 Alternatives Considered). An application cannot be made to Eirgrid for a grid connection agreement until a project has received planning approval. Eirgrid were contacted at the consultation stage but no reply was received (See Chapter 4: Consultations).

Section 11.5.3.8 Proximity to Roads and Railways sets out a minimum set back distance of a blade tip height of the turbine plus 10%, from National and Regional roads and railways.

Action: The nearest Regional Road to a turbine is the Durrow/Johnstown Road (R639). This road is 880m from the nearest turbine, T1 and therefore well beyond the limit ($136\text{m} + 13.6\text{m} = 149.6\text{m}$). There are no proximate railways.

Section 11.5.3.9 Proximity to power lines sets out the minimum clearance for all turbines and overhead transmission lines as the falling distance plus an additional flashover distance for the relevant voltage.

Action: Local electricity services within the study area (connected to local residences) are mainly made up of lower and medium voltage overhead electricity lines which are generally located in fields close to the local roads and not within falling distance of a turbine. There are no overhead high voltage transmission lines near the turbine locations.

Section 11.5.3.10 Interference with communication systems requires that licenced operators of communication systems, mobile phone operators and the Irish Aviation Authority (IAA) be consulted prior to submission of the planning application.

Action: Sixteen licenced operators of communication systems and mobile phone operators and the Irish Aviation Authority (IAA) were consulted for the preparation of the Telecomms Impact Assessment Appendix 16.3 and the Aviation Review Statement Appendix 16.4 of EIAR Chapter 16: Material Assets.

Section 11.5.3.11 Appropriate Setback Distance to apply requires that a setback distance for visual amenity purposes, of 4-times the tip height should apply between a wind turbine and the nearest house, subject to a mandatory minimum setback of 500m. Discretion applies where the owner(s) and occupier(s) are agreeable, provided minimum noise requirements are met.

Action: There is no turbine proposed for a location within 500m of a house in the Gathabawn Windfarm scheme.

Section 11.5.3.12 Effects on Equine Facilities requires that the impacts on these facilities be assessed.

Action: The potential for significant impacts on local equine facilities is considered in Chapter 6 Land. In the absence of Irish Guidelines, the British Horse Society 2024 "Advice on Wind turbines and horses for planning officers and developers" refers, wherein it is advised that a separation distance of three times the turbine tip height from equestrian businesses be maintained (this is a repeat of the BHS advice in 2015). The nearest equestrian enterprise is to the east of the site and owned and used by a windfarm site landowner.

EIAR 1.3.4.7.1 Conclusion to Assessment and Development requirements

It can be concluded that the Gathabawn Windfarm application is compatible with the assessment and development requirements for wind energy as expressed in Section 11.5.3 of the KCCDP.

EIAR 1.3.5 Laois County Development Plan 2021-2027**EIAR 1.3.5.1 Views and Prospects (Section 11.11.1 of LCDP)**

Laois County Council recognises the need to protect the character of the county by protecting views and scenic routes. However, it is acknowledged that in certain circumstances, some development may be necessary.

Table 11.7: Scenic Views and Prospects in County Laois

- View No. 004 Road No. L5753 in the townlands Cullahill – Views towards Knockmannon Hill
- View No. 021 Road No. L5757 in the townland of Clonaslee – Views of Cullahill Castle and Knockmannon Hill
- View No. 014 R639 in the townland of Cullahill, Durrow – Views towards Caponellan Hill
- View No. 022 – Heywood Demesne – Views of Mass lough and of Ballymartin Hill beyond
- View No. 023 – Heywood Demesne – Views over farmland and of Ballymartin Hill

Map 11.8 – Scenic Views and Prospects in County Laois, also refers.

Policy Objective SV 1: Protect views from designated scenic routes indicated in Table 11.7 and Map 11.8 (Scenic Views and prospects in County Laois) of the Plan, by avoiding any development that could disrupt the vistas or disproportionately impact on the landscape character of the area, thereby affecting the scenic and amenity value of the views.

The impact of the impact on the landscape character of the area and the scenic and amenity value of Laois CDP designated view numbers V004, V014, V021, V022 and V023 are assessed in Chapter 14: Landscape, represented by Viewpoints VP37, VP6, VP6, VP2 and VP2 respectively. The views afforded are assessed as having a slight-imperceptible (VP2) and moderate-slight (VP37, VP6)/ negative/long term impact.

Natural Heritage Designations

The Gathabawn Windfarm site is not located within any designated sites.

EIAR 1.3.6 Conclusion to Policy Context for Gathabawn Windfarm

The proposed development of a windfarm to generate renewable electricity for export to the National Grid is compatible with European and National Policy on the de-carbonisation of the electricity sector as part of Climate Action imperatives.

The proposal is also compatible with European and National policy to develop indigenous, renewable sources of electricity generation in the context of security of supply independent of gas supply, particularly from Russia and other fossil fuel suppliers outside of the EU area.

The proposal is consistent with all aspects of each of the plans, strategy and objectives of Section 15 of the Climate Action and Low Carbon Development (Amendment) Act 2021 (Climate Act). An Coimisiún Pleanála is statutorily obliged in so far as practicable, to perform its functions in a manner consistent with Section 15 of the Climate Act. Gathabawn Windfarm is assessed in the context of Section 15(1) requirements in the National Policy Section above and in Appendix 2.2 of Chapter 12: Climate, and is fully compatible with the objectives of the Climate Act.

The Kilkenny County Development Plan is supportive of climate action and development of renewable resources including wind energy, in suitable locations in the County.

The siting and design of Gathabawn Windfarm is also compatible with the Wind Energy Development Guidelines 2006 and the Draft Revised Wind Energy Development Guidelines 2019.

The purpose of the proposed windfarm is to generate electricity from the power in the wind and export that electricity to the National Grid for sale in the Irish electricity market. The activity of generating electricity from the wind has no associated air pollution emissions. The activity also has the advantage of being renewable and sustainable; the activity is indigenous and therefore improves security of electricity supply; and the activity does not require increasingly expensive imported fossil fuels like coal and gas and therefore the national balance of payments is improved.

Of these advantages, the overwhelming reason for the development of renewable energy generation capacity like windfarms, is to offset polluting emissions to the atmosphere. Fossil fuel generated electricity emits greenhouse gases (GHGs) which are changing the planet's climate by causing global temperatures to rise. It is now scientifically agreed that the continued emission of GHGs will cause further warming and long-lasting changes in all components of the climate system, increasing the likelihood of pervasive and irreversible impacts for people and ecosystems. Every unit (kWh) of electricity generated by wind turbines in Ireland will replace a unit of electricity that would otherwise be generated predominantly by fossil fuel generation and thereby prevents pollution that would otherwise be emitted by such fossil fuel generation.

It is the United Nation's policy in their September 2024 policy document Pact for the Future, Global Digital Compact and Declaration on Future Generations that *"In order to seize the opportunity that present generations possess to leave a better future for generations to come and to fulfil our commitment to meet the demands of the present in a way that safeguards the needs and interests of future generations, while leaving no one behind, we will observe the following guiding principle" No. 5 that "A clean, healthy and sustainable environment, where humanity lives in harmony with nature, must be created and maintained by urgently addressing the causes and adverse impacts of climate change and scaling up collective action to promote environmental protection.*

The Gathabawn Windfarm development is a sustainable development which will contribute to international, national and local policy actions to address the causes of climate change.

EIAR 1.3.7 Financial Contribution to the Area

EIAR 1.3.7.1 Community Benefit Scheme

The Department of Environment, Climate and Communications currently operates the Renewable Electricity Support Scheme (RESS), to promote the generation of electricity from renewable sources. The Scheme is operated through a competitive auction for a price support for electricity sales from renewable energy generation plant. The Government is committed to holding RESS auctions at frequent intervals throughout the lifetime of the Scheme. Gathabawn Windfarm will apply to the Scheme once planning has been granted.

RESS scheme Terms & Conditions stipulate that windfarm projects selling electricity supported by RESS, are required to pay into a Community Benefit Fund an amount of €2 per megawatt hour (MW/hr) produced by the project, to be distributed in the locality annually through near neighbour payments and payments to local community groups. Based on an amount of €2 MW/hr and predicted production at the windfarm, the Gathabawn Windfarm Community Benefit Fund would be circa **€300,000** per annum. This annual community benefit payment will represent a substantial and sustainable benefit to the local community and community groups, for the lifetime of the windfarm.

A Gathabawn Windfarm Community Fund of circa €300,000 per annum will be created based on the RESS rules, irrespective of whether the windfarm participates in RESS or other Government price support scheme or not.

EIAR 1.3.7.2 Commercial Rates to Kilkenny City & County Council Local Authority Area

The basis of the Commercial Rates, paid to the Local Authority, are calculated by the Valuations Office taking into consideration the capacity factor of the windfarm and the electricity generation prediction per annum for the site. The Annual Rateable Valuation (ARV) set by the Local Authority is then applied to the Valuation Office calculation and the annual commercial rates payable by the windfarm to the Local Authority is set.

Based on current Valuations Office rates and Kilkenny County Council ARV, **commercial rates payments to Kilkenny County Council of circa €800,000 per annum are predicted**, for the lifetime of the windfarm delivering a positive benefit to the people of County Kilkenny.

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EIAR 1.5 List of Figures

FIGURES

Figure 5.1.1	Whole Gathabawn Windfarm Project - Location on Discovery Mapping
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APPENDICES

No Appendices

Figures

