

Planning Report

Slievegrine Renewable
Energy Development, Co.
Waterford





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Table of Contents

1.	EXECUTIVE SUMMARY	5
2.	INTRODUCTION	6
2.1	Report Structure and Contents.....	6
2.2	Introduction.....	6
2.3	Rationale for the Proposed Project	8
2.3.1	Why the Proposed Project is Needed.....	8
2.4	RED III	9
3.	CLIMATE ACTION AND LOW CARBON DEVELOPMENT ACT 2015 (AS AMENDED)	11
4.	PROPOSED PROJECT BACKGROUND	16
4.1	The Applicant.....	16
4.2	Site Location and Context	16
4.3	Planning History	16
4.4	Pre-Application Consultation	18
4.4.1	EIAR Scoping	18
4.5	Pre-Planning Meetings	18
4.5.1	An Coimisiún Pleanála (Section 37B).....	18
4.5.2	Waterford City & County Council.....	22
4.5.3	Community Consultation	23
5.	THE PROPOSED PROJECT DESCRIPTION.....	25
6.	PROPOSED PROJECT DESIGN PROCESS.....	31
6.1	Strategic Site Selection.....	31
6.2	Detailed Constraints Mapping	31
6.3	Turbine Layout Design Process	32
7.	PLANNING POLICY OVERVIEW	33
7.1	Local Planning Policy	36
7.1.1	Waterford City & County Development Plan 2022-2028	36
7.1.2	Waterford City & County Council Climate Action Plan 2024-2029	59
7.1.3	Waterford Renewable Energy Strategy 2016-2030	59
7.2	Summary of Compliance with Planning Policy	61
8.	PLANNING ASSESSMENT.....	62
8.1	Principle of Development.....	62
8.1.2	Conclusion	64
8.2	Key Environmental Considerations	64
9.	CONCLUSION	68

TABLE OF TABLES

Table 1: Compliance with Section 15(1) of the Climate Act.....	13
Table 2: Planning History Summary Table.....	17
Table 3: Compliance with WCCDP Policies & Objectives.....	38
Table 4: Planning Assessment Summary.....	65



TABLE OF FIGURES

<i>Figure 1: Proposed Site Location</i>	<i>27</i>
<i>Figure 2: Waterford Renewable Energy Strategy 2016-2030.....</i>	<i>60</i>

1.

EXECUTIVE SUMMARY

The Slievegrine Renewable Energy Development consists of the provision of a 23-turbine wind farm and associated infrastructure, located at Ballycullane and surrounding townlands in Co. Waterford, including the Proposed Grid Connection which will connect the Proposed Wind Farm to the existing Knockraha-Cullenagh 220kV overhead line in the townland of Ballycullane.

The Slievegrine Renewable Energy Development will henceforth be referred to using the following terminology, as defined in **Chapter 1** of the Environmental Impact Assessment Report (EIAR); ‘Proposed Project’, ‘Proposed Wind Farm’, ‘Proposed Grid Connection’, ‘Proposed Turbines’, ‘Proposed 110kV Substation’, ‘Proposed 220kV Loop-in Substation’ ‘Proposed 110kV Underground Cabling Route’, ‘Site’, ‘Proposed Wind Farm site’.

This planning application for the Proposed Project is made under the provisions of Section 37E of the Planning and Development Act 2000, as amended (the Act), to An Coimisiún Pleanála (ACP). The Proposed Project will have an estimated installed generating capacity of 145.2MW (17 no. 6MW and 6 no. 7.2MW), supplying clean renewable energy to the national grid.

This Planning Report has been prepared in support of the application for the Proposed Project which is accompanied by an EIAR and Natura Impact Statement (NIS). The introductory sections of this Planning Report, provide an overview of the Proposed Project, the Proposed Project design, the Applicant, the site location and context, the planning history of the Site and a summary of the pre-planning process. The design process is outlined, demonstrating the rationale for site selection and its suitability for wind energy development. The iterative design process outlines the design stages from the initial design to the final design iteration. Each design iteration responded to the specific constraints on the Site, as they were identified by site surveys and detailed analysis.

The Proposed Project is strongly supported by European, national, regional and local policy and legislation. At a European Union (EU) level, the Proposed Project is supported by the EU Renewable Energy Directive and REPowerEU. At a national level, the Proposed Project is supported by the National Planning Framework First Revision, the Climate Action Plan 2025, the National Energy Security Framework, among other national climate and energy policies. The legally binding greenhouse gas emission (GHG) reduction target and the obligations of public bodies under the Climate Action and Low Carbon Development (Amendment) Act 2021 (the Climate Act) should also be considered in the assessment of applications for Renewable Energy Development. At a regional and local level, the Southern Regional Assembly Regional Spatial and Economic Strategy and the Waterford City & County Development Plan 2022-2028 both recognise the importance of an increase in renewable energy supply in order to tackle climate change and meet national and European climate targets.

The development of viable sites for wind energy development is essential to meet European, national, and local climate and renewable energy targets. Ireland needs to scale up onshore wind energy development at an unprecedented rate to achieve our 9GW target and 80% RES-E target set out in the Climate Action Plan 2024 (CAP 24) and Climate Action Plan (CAP 25). The reality of achieving these targets is the installation of over 600 Megawatts (MW) of wind energy per year until 2030. If permitted, the Proposed Project will not only contribute to the decarbonisation of the electricity sector, other sectors and the transition to a low carbon, climate resilient economy.

To conclude, it is submitted that, the Proposed Project is strongly supported by European, national, regional and local planning policy. The development will make a significant contribution to renewable energy generation targets, support the transition to a low-carbon economy, enhance energy security, and assist in meeting climate action commitments. Furthermore, the Proposed Project has been carefully designed to avoid, minimise and mitigate potential environmental effects, with the assessment demonstrating that no significant adverse impacts will arise that would outweigh its substantial public benefits. On balance, the Proposed Project represents a sustainable form of development, and it is respectfully submitted that planning permission should be granted.

2.

INTRODUCTION

2.1

Report Structure and Contents

Section 1: Executive Summary – Provides an overview of the Report and its principal conclusions.

Section 2: Introduction – Sets out the purpose and structure of the report and provides a summary of the Proposed Project.

Section 3: Climate Action and Low Carbon Development Act 2015 – Sets out the obligations of consenting authorities to meaningfully engage with national climate objectives when exercising their functions.

Section 4: Proposed Project Background – Introduces the Applicant and describes the location and context of the site.

Section 5: Proposed Project Description – Provides a description of the main elements of the Proposed Project.

Section 6: Proposed Project Design Process – Describes the progression of the Proposed Project design from site selection through to the final design.

Section 7: Planning Policy Overview – Reviews the relevant national, regional and local planning policy applicable to the Proposed Project.

Section 8: Planning Assessment – Assesses the Proposed Project against the relevant planning policy framework, including key environmental considerations.

Section 9: Conclusion – Summarises the principal findings and conclusions of the Report.

2.2

Introduction

This Planning Report has been prepared by MKO on behalf of Slievegrine Ltd, (the Applicant) to accompany a planning application to ACP for construction of a renewable energy development which will include 23 wind turbines, a 110kV substation, a 220kV loop-in substation and 110kV underground cabling connection, and all associated infrastructure and works in the townlands of Ballycullane, Ballyguiry, Carronadavderg, Carronahyla, Carronbeg, Clashbrack, Cloghraun, Drumslog, Garrynagree, Glen Beg, Glen More, Graigue, Knockatoor, Knocknahoola, Lackamore, Lackensillagh, Lisgriffin, Lyre, Monacullee, Monageela, Mountstuart, Moyng, Pulla, Reamanagh East, Reamanagh West, Reanaviddoge, Toor South and Toor North, Co. Waterford. The Proposed Project will be known as the ‘Slievegrine Renewable Energy Development.’

The Proposed Project meets the threshold for Strategic Infrastructure Development (SID) as set out in the Seventh Schedule of the Act, being “*An installation for the harnessing of wind power for energy production (a wind farm) with more than 25 turbines or having a total output greater than 50 megawatts*” and is therefore being submitted directly to ACP as an SID in accordance with Section 37E of the Act.

The Planning and Development Act 2024 (the “2024 Act”) is being commenced on a phased basis, with the remaining provisions, including the relevant development consent provisions, anticipated to be brought into operation shortly after this application is lodged. Once those provisions are commenced and section 37E of the Act is repealed, new applications of this nature will fall to be made under Chapter 4 of Part 4 of the 2024 Act. This will not, however, alter the statutory procedure applicable to this application. However, section 626(a) of the 2024 Act provides that, notwithstanding the repeal of the

relevant provisions of the Act, the Act will continue to apply and have effect in relation to an application for permission made under the Act before such repeal.

Accordingly, provided that this application is made before the repeal of section 37E, it will remain governed by the Act and will continue to be processed and determined by ACP under section 37E and the associated provisions of that Act, notwithstanding the subsequent commencement of the corresponding provisions of the 2024 Act.

As set out in **Chapter 1** of the EIAR, the following terminology applies;

- The **‘Proposed Project’** refers to the entire proposed development (‘Proposed Wind Farm’ and ‘Proposed Grid Connection’) for the purposes of this EIAR in accordance with the EIA Directive, which is the subject of this planning application. The Proposed Project is described in detail in Chapter 4 of this EIAR.
- The **‘Proposed Wind Farm’** refers to the 23 no. turbines, meteorological mast, telecommunications relay mast, and all associated foundations and hard-standing areas, access roads and junctions, construction compounds, 33kV underground cabling, borrow pits, spoil management, site drainage, rerouting of a section of the Dungarvan - Foxhole 38kV overhead line underground including associated 38kV end masts and a 38kV joint bay, biodiversity management and enhancement plan measures, tree felling and vegetation removal, operational stage signage, a 110kV onsite substation and all ancillary works and apparatus.
 - The **‘Proposed Turbines’** refers to the 23 no. wind turbines associated with the Proposed Wind Farm.
 - The **‘Proposed 110kV Substation’** refers to the 110kV onsite substation in the townland of Clashbrack within the Proposed Wind Farm site.
- The **‘Proposed Grid Connection’** refers to the Proposed 220kV Loop-in Substation in the townland of Ballycullane and the Proposed 110kV Underground Cabling Route and all ancillary works and apparatus.
 - The **‘Proposed 220kV Loop-in Substation’** refers to the proposed 220kV loop-in substation complex and associated construction compound in the townland of Ballycullane connecting to the existing Knockraha-Cullenagh 220kV overhead line, the proposed 220kV underground cabling, 220kV end masts, screening planting, access roads and all ancillary works and apparatus.
 - The **‘Proposed 110kV Underground Cabling Route’** refers to the 9km of 110kV cabling route and associated joint bays connecting the Proposed 110kV Substation to the Proposed 220kV Loop-in Substation.
 - The **‘Site’** refers to the primary study area for the EIAR, as delineated by the EIAR Site Boundary in green as shown on Figure 1-1 of the EIAR and encompasses an area of approximately 1,450 hectares.
 - The **‘Proposed Wind Farm site’** refers to the portion of the Site surrounding the Proposed Wind Farm infrastructure detailed above.
 - The **‘Proposed Grid Connection site’** refers to the portion of the Site excluding the Proposed Wind Farm site.

The purpose of this Planning Report is to outline the background to the Proposed Project, the key elements of the proposal and to demonstrate that it complies with all relevant planning policy provisions and is in accordance with the proper planning and sustainable development of the area. This Planning Report provides a comprehensive assessment of the Proposed Project’s consistency with the relevant planning policy framework at European, national, regional, and local levels.

A planning application under Section 37E of the Act will be submitted directly to ACP for the Proposed Project. The Proposed Project will be the subject of EIA as it meets the mandatory EIA requirement as set out in Class 3(i) of Schedule 5 of Part 2 of the Planning & Development Regulations 2001, as amended. The Proposed Project exceeds 5MWs in scale and proposes more than 5 turbines and therefore is subject to mandatory EIA. The EIAR, along with the NIS which accompany this planning application assess all

elements of the Proposed Project. Both the EIAR and NIS contain the information necessary for ACP, to complete the Environmental Impact Assessment (EIA) and Appropriate Assessment (AA) as required for the planning permission application.

2.3 Rationale for the Proposed Project

Ireland's Climate Action Plan 2025 (CAP 25) sets ambitious yet essential targets for renewable energy, including 9GW of onshore wind capacity—with at least 5GW to be delivered by 2030—and an 80% share of renewable electricity by the same year. However, multiple assessments, including the Climate Change Advisory Council (CCAC) Annual Review and the Environmental Protection Agency (EPA) emissions projections, confirm that Ireland is not on track to meet these targets. Significant gaps remain in renewable energy deployment, particularly in grid capacity expansion and wind farm development, while continued reliance on fossil fuels threatens national and EU climate commitments.

In this regard, the Proposed Project alone is estimated to contribute 145.2MW of installed capacity to the national electricity grid. Its approval would make a significant contribution toward Waterford's renewable energy ambitions and help bridge the widening gap between policy commitments and actual renewable energy infrastructure development.

2.3.1 Why the Proposed Project is Needed

Ireland has committed to achieving a climate-neutral economy by 2050 and reducing greenhouse gas emissions by 51% by 2030 relative to 2018 levels. Achieving these targets will require the rapid deployment of renewable energy infrastructure across the country. There is no single technology or measure capable of delivering the scale of decarbonisation required. Instead, the transition will depend on the development of a large number of renewable energy projects, including onshore wind farms, solar developments, energy storage facilities, and supporting grid infrastructure.

Onshore wind energy has played a critical role in Ireland's renewable energy transition to date. In 2020, Ireland generated over 40% of its electricity from renewable sources, with onshore wind providing the largest contribution. This achievement was delivered through the cumulative development of individual renewable energy projects across the country. Similarly, meeting future climate and energy targets will require the continued delivery of new renewable energy developments.

The Government's Climate Action Plan identifies a target of 9 GW of installed onshore wind capacity and 80% renewable electricity generation by 2030. These targets must be achieved within the current decade to align with Ireland's legally binding climate commitments and to support the transition away from fossil fuels. The Proposed Project will contribute directly to the achievement of these national objectives by increasing the supply of renewable electricity and displacing electricity generation from fossil fuel sources.

The need for urgent climate action is supported by an extensive body of scientific evidence demonstrating the ongoing and accelerating impacts of climate change globally and within Ireland. The World Meteorological Organization (WMO) has reported that recent years have been among the warmest on record globally, while climate observations in Ireland indicate long-term increases in temperature, rainfall intensity, sea levels and ocean temperatures.

Met Éireann's climate assessments identify a number of significant trends affecting Ireland, including:

- Rising concentrations of greenhouse gases in the atmosphere;
- Increasing average air temperatures across all seasons;
- More frequent warm weather events;
- Rising sea levels around the Irish coast;
- Increasing ocean temperatures and acidity;
- Higher annual precipitation levels and increased flooding risks;

- Evidence of increased drought potential in some regions; and
- Ongoing changes in land cover and ecosystems.

More recent climate monitoring indicates that the last several years have continued this warming trend, with record or near-record temperatures being recorded nationally. These observed changes are consistent with international scientific assessments which conclude that human-induced greenhouse gas emissions are causing significant and potentially irreversible impacts on the global climate system.

National and international institutions, including the United Nations, the Environmental Protection Agency (EPA), the Climate Change Advisory Council (CCAC), and the Irish Government, have repeatedly emphasised the urgency of accelerating decarbonisation measures. Despite progress to date, Ireland remains off track to achieve its 2030 emissions reduction targets and carbon budgets. The EPA and CCAC have both highlighted the need for significantly faster deployment of renewable energy projects if national climate objectives are to be achieved.

Against this background, the Proposed Project is required to support Ireland's transition to a low-carbon economy. By generating renewable electricity, reducing dependence on fossil fuels, contributing towards national renewable energy targets, and supporting Ireland's legally binding climate commitments, the Proposed Project will provide an important public benefit at both local and national levels.

2.4

RED III

In November 2023, Directive (EU) 2023/2413 (“RED III”) which amended Directive (EU) 2018/2001 on the promotion of the use of energy from renewable sources, entered into force. RED III increased the EU-wide renewable energy target from 32%, as set under the previous revision of the Directive, to at least 42.5% by 2030, with Member State collectively required to achieve a target of 45%. The increase was proposed under the publication of the REPowerEU in May 2022. RED III also introduces and strengthens renewable energy objectives applying to Member States in the industry, transport, buildings, and heating and cooling sectors.

Under RED III, EU Member States are required to identify and designate renewables acceleration areas, within which qualifying renewable energy projects may benefit from streamlined environmental assessment and permit-granting procedures, subject to the conditions and environmental constraints prescribed by the Directive.

RED III also establishes a presumption that the planning, construction and operation of renewable energy plants, their connection to the grid, the related grid itself and storage assets are in the overriding public interest and serves public health and safety when specified legal interests are balanced. These measures came in response to REPowerEU, which identified permitting as one of the principal bottlenecks affecting the deployment of renewable energy at scale.

The deadline for the transposition of most provisions of RED III was 21 May 2025, with an earlier deadline of 1 July 2024 applying to certain provisions concerning renewable energy permitting, including Article 16f. Article 16f establishes the legal presumption that:

“the planning, construction and operation of renewable energy plants, the connection of such plants to the grid, the related grid itself and storage assets are presumed as being in the overriding public interest and serving public health and safety when balancing legal interests in individual cases for the purposes of Article 6(4) and Article 16(1), point (c), of Directive 92/42/EEC [the ‘Habitats Directive’], Article 4(7) of Directive 2000/60/EC [the ‘Water Framework Directive’] and Article 9(1), point (a), of Directive 2009/147/EC [the ‘Birds Directive’].”

On 6 August 2025, the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. No.274 of 2025) were made and, with the exception of certain provisions relating to mandatory

EIA scoping, came into operation on 7 August 2025. The Regulations give effect, for the purposes of the Irish planning system, to Articles 15e(5), 16, 16b, 16c(2), 16c(3), 16d, 16e and 16f of RED III.

For applications for permission for renewable energy development made directly to ACP under section 37E of the Act, section 37JA provides for a completeness check to be undertaken within 45 days of receipt of the application. Where the application is acknowledged as complete by ACP, the applicable decision-making period under Section 37JB runs from the date of the notice acknowledging its completeness. Subject to section 37JB(3), Section 37JB provides for a decision-making period of 52 weeks for renewable energy development with an electrical capacity of 150kW or more and 30 weeks for renewable energy development with an electrical capacity below 150 kW or for repowering developments.

Mandatory EIA scoping provisions, introduced by S.I No.274 of 2025 have subsequently deferred and are scheduled to come into operation on 1 November 2026. As this application is being made before that date, those mandatory scoping provisions do not apply to the Proposed Project.

In this regard, the planning application for the Proposed Project has been prepared having regard to RED III and the requirements given effect through the applicable Irish planning legislation. In particular, the application has been reviewed against the Schedule of Information to inform the Completeness Check provided by ACP in Appendix 2 of the Inspector's Report relating to the SID determination under case reference PC93.323038. A table demonstrating how the application addresses each item in the Schedule has been included as an appendix to the cover letter submitted with this planning application.

3.

CLIMATE ACTION AND LOW CARBON DEVELOPMENT ACT 2015 (AS AMENDED)

A significant development in Irish planning law in relation to the obligations on public bodies in accordance with Section 15 of the Climate Action and Low Carbon Development Act 2015, as amended (the Climate Act) is directly relevant to the determination of this application for the Proposed Project. The legal analysis of Section 15 of the Climate Act has arisen from a challenge to a decision of ACP to refuse planning permission for a wind farm in County Laois. The Supreme Court issued a judgment on this matter on 4th February 2026 in Coolglass Wind Farm Limited v An Coimisiún Pleanála [2026] IESC 5.

The Climate Act establishes a legislative precedent to reduce Ireland’s carbon emissions. The Climate Act legally binds Ireland to achieve net-zero emissions no later than 2050, and to a 51% reduction in emissions by the end of this decade.

The Climate Act also incorporates the following key provisions:

- Embeds the process of setting binding and ambitious emissions-reductions targets in law;
- Provides for a national climate objective, which commits to pursue and achieve no later than 2050, the transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy;
- Provides that the first two five-year carbon budgets proposed by the Climate Change Advisory Council should equate to a total reduction of 51% over the period to 2030, relative to a baseline of 2018;
- Strengthens the role of the Climate Change Advisory Council;
- Establishes that the government must adopt carbon budgets that are consistent with the Paris agreement and other international obligations;
- Sets actions for each sector will be detailed in the Climate Action Plan which must be updated annually; and
- Establishes that Local Authorities must prepare individual Climate Action Plans which will include both mitigation and adaptation measures and will be updated every five years.

Section 15(1) below places an obligation on public bodies to perform their functions in a manner which favours climate action, unless it is objectively impracticable to do so.

“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.”

Significance of the Coolglass Judgement

The Supreme Court establishes that consenting authorities must make decisions ‘in so far as practicable’ in a manner ‘consistent with’ the approved national long term climate action strategy and the approved national long term climate action strategy as set out in Section 15(1) of the Climate Act. This means that departure from climate objectives is permissible, but only where there are genuine practical difficulties that make full alignment impracticable.

Consenting Authorities, such as ACP, must therefore meaningfully engage with national climate objectives when exercising their functions, including decision-making and must also demonstrate how those functions have been carried out in a manner consistent with, in so far as practicable, national climate objectives.

Taking these legal duties into account, ACP is required to attribute significant weight to national climate policy and the delivery of renewable energy infrastructure, such as the Proposed Project. This is reinforced by the location of the Proposed Project within an area identified as a ‘Preferred Area,’ for wind energy development under the Waterford Renewable Energy Strategy 2016-2030. Therefore, the Proposed Project is supported by national and local planning policy, subject to detailed assessment of environmental effects and compliance with relevant development managements standards.

The significance of the judgement is that Consenting Authorities, including ACP are now under clear, legal duty to give meaningful consideration of the contribution made to the achievement of national climate targets by renewable energy developments, such as the Proposed Project. This is of particular importance where a development would advance decarbonisation targets.

Relevance of the Proposed Project

The Proposed Project comprises a renewable energy development, which will make a meaningful contribution to the fulfilment of national climate objectives, including those set out in the Climate Action Plan 2025 (CAP 25), which sets out targets to achieve an 80% electricity share as well as 9GW of renewable energy by 2030.

Considering the Coolglass Supreme Court Judgement, ACP is required to attribute a significant weight to the following benefits in their assessment of the Proposed Project:

- The Proposed Project will contribute to compliance with Ireland’s sectoral ceilings and Ireland’s carbon budgets,
- It will generate renewable electricity and help to displace fossil-fuel based generation,
- It will further national climate objectives, including the CAP 25 target of an 80% renewable electricity share as well as 9GW of renewable energy by 2030,
- It will support Ireland’s legally binding commitments under national, European and International climate law.

Therefore, a decision to grant permission for the Proposed Project would represent the performance of ACP’s functions in a manner that is consistent with Section 15(1) of the Climate Act.

Compliance with Section 15(1) of the Climate Act

Having regard to these functions, **Table 1** demonstrates how, in determining the applications for the Proposed Project, ACP would be performing its functions in a manner consistent with Section 15(1) of the Climate Act

Table 1: Compliance with Section 15(1) of the Climate Act

Section 15(1) Requirement	Proposed Project Compliance	Conclusion
a) Most recent approved climate action plan	The Proposed Project, which will contribute directly towards the CAP 25 goals of 9GW of wind energy by 2030 and renewable electricity share of 80% by 2030. Onshore wind is identified as being critical in the decarbonisation of the electricity, and as such the Proposed Project should be considered in that regard. The Proposed Wind Farm will have a total estimated installed generating capacity of 145.2 MW. On this assumption, the Proposed Project will result in the net displacement of approximately 79,376 tonnes of carbon dioxide (CO₂) per annum, from traditional carbon-based electricity generation.	A grant of permission would constitute the performance of ACP's functions in a manner consistent with CAP 25, insofar as is practicable.
b) Most recent approved national long term climate action strategy,	The Proposed Project will support the national long term climate action strategy as the development represents critical renewable energy infrastructure, that will make a meaningful contribution to achieving the State's reduced emissions targets and the transition towards a climate resilient society.	A grant of permission would constitute the performance of ACP's functions in a manner consistent with the most recent approved national long term climate action strategy, as far as is practicable.
c) Most recent approved national adaptation framework and approved sectoral adaptation plans	The Proposed Project will aid Ireland in adhering to, or limiting the exceedance of, the country's carbon budgets. The electricity sector failed to remain within the designated sectoral ceiling of 20 Mt CO₂ eq for the first carbon budget period from 2020 to 2025. The delivery of renewable energy infrastructure such as the Proposed Project, which will result in the net displacement of approximately 79,376 tonnes of carbon dioxide (CO₂) per annum, is integral to the reduction of emissions from electricity generation and the transition towards a low carbon, climate resilient society. The national renewable energy targets and the carbon budgets are integral to the government's response to the climate crisis.	A grant of permission would constitute the performance of ACP's functions in a manner consistent with the most recent approved national adaptation framework and approved sectoral adaptation plans, insofar as is practicable.

Section 15(1) Requirement	Proposed Project Compliance	Conclusion
d) the furtherance of the national climate objective	The Proposed Project, consisting of 23 no. wind turbines and associated infrastructure aligns with national climate policy objectives. The Proposed Project, with a total estimated installed generating capacity of 145.2MW, will make a significant contribution to achieving the CAP 25 target of 9GW of onshore wind energy by the year 2030.	A grant of permission would constitute the performance of ACP's functions in a manner consistent with the furtherance of the national climate objective insofar as is practicable.
e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State	The Proposed Project will support the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State through the generation of wind energy and displacing electricity that would otherwise be produced from fossil fuel sources.	A grant of permission would constitute the performance of ACP's functions in a manner consistent with the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.

Conclusion

The decision of the Supreme Court in *Coolglass Wind Farm Limited v An Coimisiún Pleanála* [2026] IESC 5 confirms that Section 15 of the Climate Act imposes a binding obligation on consenting authorities, including ACP, to determine planning applications, insofar as practicable, in a manner that is consistent with the fulfilment of national climate objectives and to give adequate reasons demonstrating that consistency.

The Proposed Project is supported by local, regional and national policy and has been designed in accordance with the latest national guidance and best practice. It has also been demonstrated, in the EIAR and NIS, that the Proposed Project will not give rise to any significant adverse effect on the environment or on the integrity of European Sites.

Crucially, the Proposed Project will have a total estimated installed generating capacity of 145.2 MW and will result in the net displacement of approximately 79,376 tonnes of carbon dioxide (CO₂) per annum, including accounting for back-up generation, making a significant contribution towards the CAP 25 goals of 9GW of wind energy by 2030 and renewable electricity share of 80% by 2030.

Accordingly, ACP can lawfully exercise its planning judgement to grant permission for the Proposed Project in a manner consistent with its statutory duty under Section 15 of the Climate Act and the principles clarified in the *Coolglass Judgement*, whilst also aligning with EU, national and local policy objectives.

4. PROPOSED PROJECT BACKGROUND

4.1 The Applicant

The Applicant for the Proposed Project, Slievegrine Ltd., is an associated company of Enerco Energy Ltd., which is an Irish-owned, Cork-based company with extensive experience in the design, construction and operation of wind energy developments throughout Ireland, with projects currently operating or in construction in Counties Cork, Kerry, Limerick, Clare, Galway, Mayo and Donegal.

By Q4 2025, Enerco associated companies had over 975 Megawatts (MW) of wind generating capacity in commercial operation or in construction, with a further c.500MW of projects at various stages in its portfolio to assist in meeting Ireland's renewable energy targets.

4.2 Site Location and Context

The Site is made up of two distinct elements, the Proposed Wind Farm and the Proposed Grid Connection. The Site is located within a rural setting in southeast Waterford, approximately 5km southwest of Dungarvan, Co. Waterford. The village of Clashmore is located approximately 3.1km south of the Site.

The Proposed Grid Connection includes 110kV underground cabling from the Proposed 110kV Substation, in the townland of Clashbrack, Co. Waterford, to the Proposed 220kV Loop-in Substation in the townland of Ballycullane, Co. Waterford. The 110kV underground cabling route measures approximately 9km in length and is located primarily within the curtilage of the public road corridor with two sections (approximately 305m and 815m) being located within private lands.

The Site measures approximately 1,450 hectares and comprises a mix of agri-pastoral land and commercial forestry. The N25 national primary road runs in a north to south direction to the east of the Site, passing within 200m of the Site at its closest extent. The L-2024 local road traverses the northern section of the Proposed Wind Farm in an east- west direction, with the L-6085 local road bisecting the eastern portion of the Site. The L-2023 also bisects the central section of the Site. The Site is also served by a number of existing agricultural roads and tracks. Existing site access is via forestry and agricultural entrances off the L-2023 and L-2024 local roads, as well as the L-6084 local road to the south of the Site and the L-6082 to the west of the Site. The Grid Reference co-ordinates for the approximate centre of the Site are X 619562, Y 587416 (ITM).

Current land-use on the Proposed Wind Farm is predominantly comprised of a mix of commercial forestry and pastoral agriculture. Current land-use along the Proposed Grid Connection comprises public road corridor and private land principally in agricultural use. The surrounding land use is predominantly pastoral agriculture, commercial forestry and low-density residential use along local and regional roads.

4.3 Planning History

A planning search was carried out through national planning application database and ACP's online planning portal in September 2026 for planning applications that fall within the planning application boundary of the Proposed Project within the past 10 years. The relevant planning applications are outlined in Section 2.6.1 of Chapter 2 of the EIAR and in **Table 2** below.

The planning history search also identified wind energy development applications within 25km of the Proposed Turbines. 7 no. applications relating to wind energy were found, further detail on the wind energy developments identified is outlined in Section 2.6.2 of Chapter 2 of the EIAR.

Table 2: Planning History Summary Table

PI Ref.	Description	Decision
17220	to construct a slatted cubicle shed, silage slab, all ancillary site works	Granted by WCCC on 30/06/2017
21819	Section 254 Licence Application - The erection of overground electronic communications infrastructure and any associated physical infrastructure along public roads including: - 1. The erection of new overground fibre optic cables on existing timber poles 2. The erection of new poles and associated fibre optic cables (2021WD0329)	Granted by WCCC on 02/09/2021
21705	construction of milking parlour complex including decommissioning of existing open tank	Granted by WCCC on 21/10/2021
2228	PERMISSION is sought for (a) change of use of Mountstuart Schoolhouse and detached Outbuilding to Dwelling, (b) to construct single-storey extension linking Schoolhouse and Outbuilding, (c) to use existing vehicular access to serve dwelling and install Wastewater treatment system & Ancillary Works	Granted by WCCC on 22/04/2022
22407/PL93. 314219	Junction & Bend Widening Works comprising road widening at the junction of the L2024 with the L2022 in Carronahyla townland; widening of the junction of the L2022 with the L6077 and widening of two bends along the L6077 in Knocknaglogh Upper townland; and ancillary works. The proposed development will facilitate the delivery of wind turbine blades along the roads from Pulla crossroads on the N25, to Knocknamona Windfarm Site Entrance, at Knocknaglogh Lower on the L6077. This application is accompanied by an Environmental Impact Assessment screening report and an Appropriate Assessment Report (Natura Impact Statement)	Granted by WCCC on 05/07/2022 and was upheld by ACP on 07/12/2022
2360289	the construction of a new storey and a half dwelling house and detached garage, along with septic tank and percolation area, entrance driveway and all ancillary works	Granted by WCCC on 10/10/2023

2660517	Construct a new single storey dwelling together with new entrance, bore well, septic tank, percolation area and ancillary site works	Granted by WCCC on 01/09/2026
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4.4

Pre-Application Consultation

This section of the Planning Report outlines the pre-application consultation undertaken by the Applicant for the Proposed Project. This includes scoping as part of the EIAR, pre-application meetings with ACP, and extensive consultation with the local community.

4.4.1

EIAR Scoping

As part of the constraints mapping process, which is detailed in Chapter 2, of this EIAR, telecommunications operators were contacted in November 2024 and January 2025 to determine the presence of telecommunications links or aviation assets traversing or located in close proximity to the Proposed Wind Farm site. Following this exercise, an EIAR scoping document, providing details of the Proposed Project, was prepared by MKO and circulated to prescribed statutory and non-statutory bodies in July 2025 with a follow up in June 2026. The scoping document provided details of the Proposed Project and sets out the scope of work for the EIAR. Consultees were invited to contribute to the EIAR in suggesting baseline data, survey techniques and potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR.

Copies of all scoping responses received are included in **Appendix 2-2** of the EIAR. These responses, including the relevant recommendations of consultees, have informed the scope of the assessments undertaken and the content of the EIAR. Any further consultation responses received during the determination of the planning application will be reviewed and addressed, where appropriate. Any matters relevant to the implementation of the Proposed Project will also be taken into account during its construction, operation and decommissioning, should planning permission be granted.

4.5

Pre-Planning Meetings

4.5.1

An Coimisiún Pleanála (Section 37B)

First Pre-Application Meeting - Section 37B

The Applicant engaged with ACP under the provisions of Section 37B of the Act, as to whether the Proposed Project would meet the thresholds of the Seventh Schedule of the Act. The Applicant opened consultations with ACP on the 16th of October 2025 in relation to a Proposed Project of approximately 24 no. wind turbines with an overall ground to blade tip height mix ranging from 170-185m and all associated works including, associated hardstands, electrical cabling and site development works with the potential for the wind farm to generate greater than 50 MW of electricity to the National Grid.

A SID meeting under the provisions of Section 37B of the Act was held with ACP on the 16th of October 2025 via Microsoft (MS) Teams. Those in attendance were:

On behalf of ACP:

- Una Crosse, Assistant Director of Planning,
- Susan Clarke, Senior Planning Inspector,
- Fiona Patterson, Senior Ecologist/Environmental Scientist,
- Emmet Smyth, Senior Environmental Scientist,
- Sinead White, Executive Officer,

On behalf of Agent and Applicant:

- Ronan Dunne, MKO,
- Hannah Rice, MKO,
- Eoin McCarthy, MKO,
- Natalia Stolarska, MKO,
- Corey Cannon, MKO,
- Emily Fair, MKO,
- Susan Doyle, MKO,
- Colin Fitzgerald, MKO,
- Jack Workman, MKO,
- William O'Connor, Slievegrine Ltd,
- Darren Feury, Slievegrine Ltd,

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

- The principal elements of the Proposed Project;
- RED III and its application to the Proposed Project;
- The completeness check requirements in light of RED III;
- The relevant energy policy context at international, European, national, regional and local levels;
- The Environmental Impact Assessment process, including the surveys and fieldwork completed to date; and
- The anticipated Proposed Project timeline.

Following this presentation, there was further discussion held between the project team and the representatives of ACP. Matters discussed included:

- ACP's representatives clarified that the pre-application consultation process does not comprise an assessment of the proposed application documentation, nor does it consider the merits of the proposal, but provides an opportunity to address the procedures and considerations to facilitate the processing of the application.
- The Applicant outlined that there was an error in the turbine tip heights outlined within the presentation submitted in advance of the meeting and advised that an updated slide with the revised details will be sent to ACP.
- ACP's representatives queried whether the Applicant will be likely to seek design flexibility, the Applicant informed ACP's representatives that they are not currently seeking design flexibility but that could change in the future.
- It was clarified that it is the intention of the Applicant that the proposed application would comprise of the proposed windfarm and the grid connection in a single application under Section 37E of the Act, as amended.
- Following a query from ACP's representatives, the Applicant clarified that the EIAR will cover all phases from construction to decommissioning of the proposed development, and it was also clarified that the proposed development is not located within the boundaries of a Gaeltacht area.
- ACP's representatives advised that the Applicant consider, in addition to the wider national planning policy context, the local planning policy considerations within the County Development Plan which may have a bearing on the subject site as well as the policy context in respect of the proposed development.

- The Applicant clarified that there are no peat deposits on the site and outlined the location of most proximate residential receptors.
- ACP's representatives advised that the documentation should have a consistent reference to boundaries whether red line or EIAR study area and that the EIAR chapters should be clear on same.
- The inclusion of the Water Framework Directive Assessment as a stand-alone document within the EIAR was advised.
- ACP's representatives advised that the Noise Chapter should address amplitude modulation and tonal noises and mitigation protocols for same at operational stage. Clarity in respect of shadow flicker mitigation was also advised.
- ACP's representatives advised the Applicant on the current position in respect of the completeness check and mandatory EIA scoping and advised that consultation with the NPWS was advisable.
- Proximity of the site to Natura 2000 sites was noted.

Second Pre-Application Meeting – Section 37B

The Applicant engaged with ACP for a second pre-application meeting under Section 37B of the Act. The second meeting was held on the 24th of February 2026 via MS Teams. Those in attendance were:

On behalf of ACP:

- Una Crosse, Assistant Director of Planning,
- Susan Clarke, Senior Planning Inspector,
- Paula Kearney, Senior Ecologist,
- Emmet Smyth, Senior Environmental Scientist,
- Sinead White, Executive Officer,

On behalf of Agent and Applicant:

- Ronan Dunne, MKO,
- Sean McCarthy, MKO,
- Eoin McCarthy, MKO,
- Natalia Stolarska, MKO,
- Corey Cannon, MKO,
- Emily Fair, MKO,
- Aron Von Der Geest Moroney, MKO,
- Susan Doyle, MKO,
- Colin Fitzgerald, MKO,
- William O'Connor, Slievegrine Ltd,
- Darren Feury, Slievegrine Ltd,

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

- An update on the Proposed Project
- Biodiversity
- Ornithology
- Hydrology
- Land and Soils
- Appropriate Assessment

Following this presentation, there was further discussion held between the project team and the representatives of ACP. Matters discussed included:

- ACP's representatives queried further detail regarding various elements Proposed Project such as lengths of roads proposed, heights of new end masts proposed and borrow pit detail.
- ACP's representatives advised the Applicant to consult with the Local Authority's Transportation Department with respect to works to local roads and new site entrances.
- The Applicant stated that the turbine model and delivery route are yet to be confirmed.
- ACP's representatives advised the Applicant to consult with ESB/EirGrid in relation to grid connection works in advance of submitting an application.
- The Applicant advised that there is no BESS proposed as part of the application.
- ACP's representatives highlighted the requirement to seek landowners' consent, where relevant, to make the planning application.
- The Applicant advised that the majority of construction material for access tracks, hardstanding areas, etc. will be locally sourced from borrow pits.
- ACP's representatives welcomed the inclusion of riparian planting as part of the Proposed Project.
- ACP's representatives advised on various items relating to biodiversity including that ecological surveys should be carried out on the Turbine Delivery Route (TDR) at any accommodation areas.
- ACP's representatives advised on and also queried about various aspects relating to ornithology, such as length of bird surveys, vantage point selection, guidelines by which the surveys are based on, importance of golden plover at the site and cumulative assessment.
- ACP's representatives advised on and also queried about various aspects relating to hydrology, hydrogeology, land and soils at the site including presence of a clay pan on the site, tree felling as a stressor to the hydrological system on the site, flow monitoring and presence of an ecological clerk of works during the construction phase that has an understanding of freshwater pearl mussel.

The project team provided clarification in relation to these matters during the meeting.

Third Pre-Application Meeting – Section 37B

The Applicant engaged with ACP for a third pre-application meeting under Section 37B of the Act. The third meeting was held on the 11th of March 2026 via MS Teams. Those in attendance were:

On behalf of ACP:

- Una Crosse, Assistant Director of Planning,
- Susan Clarke, Senior Planning Inspector,
- Paula Kearney, Ecologist,
- Emmet Smyth, Senior Environmental Scientist,
- Sinead White, Executive Officer,

On behalf of Agent and Applicant:

- Ronan Dunne, MKO,
- Eoin McCarthy, MKO,
- Natalia Stolarska, MKO,
- Henning Moe, MKO,
- Jack Workman, MKO,
- Susan Doyle, MKO,
- Aron Von Der Geest Moroney, MKO,
- William O'Connor, Slievegrine Ltd,
- Darren Feury, Slievegrine Ltd,

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

- > Update on Development Proposal
- > Landscape
- > Noise
- > Other Material Assets
- > Consultation Update
- > Consideration of the presentation of documents
- > Other considerations:
 - Turbine Delivery Route
 - Ornithology update
 - Freshwater pearl mussel
 - Hydrology and Hydrogeology

Following this presentation, there was further discussion held between the project team and the representatives of ACP. Matters discussed included:

- > ACP's representatives queried various aspects of the Proposed Layout relating to the site access, turbine models, lengths of roads, heights of masts and recommended for the development description to be as informative as possible.
- > ACP's representatives noted the presence of scenic routes adjacent to the site and 2 no. proposed substations to be built, noting that adequate assessment of both should be provided as part of the LVIA.
- > ACP's representatives made numerous recommendations in terms of the noise assessment to consider, including wake effects, cumulative assessment, noise monitoring locations and mitigation in relation to noise exceedances.
- > An update provided on ornithology with ACP representatives advising that to inform a robust baseline on avifauna and project Zone of Influence (ZoI), it is essential to consult with statutory bodies, non-government organizations and available datasets.
- > The Applicant provided an update on the assessment of potential impacts in relation to Freshwater Pearl Mussel and Hydrology and Hydrogeology. ACP representatives emphasised the need for a collaborative, multidisciplinary approach to ensure that the proposed development does not negatively alter the baseline environmental conditions.
- > In response to a query from the ACP representatives with respect to how shadow flicker is proposed to be addressed, the Applicant advised that the proposal will be designed to comply with the Guidelines (DoEHLG, 2006) and will also have regard to the Draft Guidelines (DoHPLG, 2019). ACP representatives noted that notwithstanding the Draft Guidelines (DoHPLG, 2019) are in draft format, it is recommended that the precedent established by wind farm developments recently permitted/approved by ACP with respect to shadow flicker mitigation measures are considered.

The project team provided clarification in relation to these matters during the meeting.

4.5.1.2 SID Determination

On the 7th of August 2026, MKO, on behalf of the Applicant, sought to close the consultation process with ACP. On the 31st August 2026, ACP wrote to the Applicant and confirmed that consultation was closed and that the Proposed Project was considered to be strategic infrastructure within the meaning of Section 37A and such any application for approval of the Proposed Project should be made directly to ACP.

4.5.2 Waterford City & County Council

The Applicant and members of the design team met with Waterford City and County Council (WCCC) in relation to the Proposed Project, prior to the submission of this planning application. The pre-planning meeting took place on 26th of February 2026 via MS Teams and included representatives from WCCC,

Slievegrine Ltd. and MKO. The team gave a PowerPoint presentation as an introduction to the site and development proposals.

Those invited and in attendance at the meeting were as follows:

On behalf of WCCC:

- Marcus Linehan, Executive Planner,
- Bernadette Guest, Heritage Officer,

On behalf of Agent and Applicant:

- Ronan Dunne – MKO,
- Eoin McCarthy, MKO,
- Natalia Stolarska, MKO,
- William O'Connor, Slievegrine Ltd,
- Darren Feury, Slievegrine Ltd,

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

- Project Background,
- Design Process,
- Project Overview,
- Turbine Delivery Route,
- Designated Sites,
- Biodiversity and Ornithology,
- Environmental Impact Assessment Report,
- Planning Policy,
- Landscape and Visual Impact,
- Consultation,

Following this presentation, there was further discussion held between the project team and the representatives of WCCC. Matters discussed included:

- Representatives from WCCC noted that a thorough landscape and visual assessment should be carried out, with consideration being made to the scenic routes in the area.
- Representatives from WCCC noted that the area is located within a favourable local policy and landscape policy for the site, however noted that this is a general classification and impacts may still occur as a result of the wind farm development.
- Representatives from WCCC noted presence of FWMP in the area, with linkages between the site and water quality requiring thorough assessment and welcomed the addition of enhancement for the Site.
- Representatives from WCCC encouraged consultation with TII guidance on intangible heritage and encouraged the use of online heritage maps.
- Representatives from WCCC queried the quantities of felling to be carried out and whether a felling license would be obtained.

4.5.3 Community Consultation

The Applicant has undertaken extensive consultation with the local community, as outlined in the Community Engagement Report included in **Appendix 2-2** of the EIAR. A Community Liaison Officer (CLO) was also appointed as the point of contact for the Proposed Project and continues to engage with the local community. The purpose of the CLO is to introduce the Proposed Project to the local community, engage and establish a line of dialogue with the local community and provide a single point

of contact for the community to seek information about the proposal as required. On the 4th of February 2026 and 15th of September 2026, Public Information Events were held in the Part Hotel, Dungarvan. The objective of the consultations was to ensure that the views and concerns of all were considered as part of the Proposed Project design and EIA process.

A Community Engagement Report was also prepared to record the consultation carried out with the local community in respect of the Proposed Project. The objective of the consultations was to ensure that the views and concerns of all were considered as part of the Proposed Project design and EIAR process.

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

5.

THE PROPOSED PROJECT DESCRIPTION

The full description of the Proposed Project is detailed in Chapter 1 of this EIAR.

The Proposed Project as set out in the public notices is as follows:

The proposed development will consist of the provision of the following:

- i. 23 no. wind turbines of varying dimensions, a meteorological mast and a telecommunications relay mast as follows:*
 - a. 6 no. wind turbines with an overall turbine tip height of 185 metres, a rotor blade diameter of 162 metres, and turbine hub height of 104 metres;*
 - b. 15 no. wind turbines with an overall turbine tip height of 175 metres, a rotor blade diameter of 150 metres, and turbine hub height of 100 metres;*
 - c. 2 no. wind turbines with an overall turbine tip height of 170 metres, a rotor blade diameter of 150 metres, and turbine hub height of 95 metres;*
 - d. A meteorological mast with a height of 80 metres and a telecommunications relay mast with a height of 30m;*
- ii. Associated wind turbines, meteorological mast and telecommunications relay mast foundations and hardstanding areas;*
- iii. A 220kV loop-in substation compound (Including control buildings (with a combined floor area of 644Sq.m) with welfare facilities, all associated electrical plant and apparatus, security fencing, underground cabling, lightning protection poles and underground wastewater holding tank), with 220kV underground cabling connecting to 2 no. lattice-type end masts with a height of 21.5 metres to facilitate a 'Loop-in' connection to the existing 220kV Knockraha-Cullenagh overhead electricity transmission line, establishment of screening planting, all within the townland of Ballycullane;*
- iv. A 110kV substation compound (Including control buildings (with a combined floor area of 644Sq.m) with welfare facilities, all associated electrical plant and apparatus, security fencing, underground cabling, lightning protection poles and underground wastewater holding tank) in the townland of Clashbrack;*
- v. 110kV underground cabling connection from the proposed 110kV substation in the townland of Clashbrack to the proposed 220kV loop-in substation in the townland of Ballycullane, primarily located within the public road corridor (including joint bays, communication chambers, earth sheath links, and ancillary works along the cabling route);*
- vi. The re-routing underground of a section of the existing Dungarvan-Foxhole 38kV overhead line with 2 no. lattice-type end masts (15m height) and 38kV underground cabling (including joint bay) in the townlands of Cloghraun and Carronbeg;*
- vii. Underground electrical (33kV) and communications cabling connecting the wind turbines and meteorological mast to the proposed 110kV substation;*
- viii. 6 no. construction compounds (including temporary site offices and welfare facilities (with a combined floor area of 607.5 Sq.m));*
- ix. 4 no. security compounds (including temporary security cabins with a combined floor area of 72 Sq.m);*
- x. Junction accommodation works to facilitate access to the site, including the provision of new and upgrade of existing entrances and junctions off the L2024, L2021, L2023, L99997 and L6082 local roads, including new permanent gated site entrances;*
- xi. Upgrade of existing site tracks/roads and provision of new site access roads, junctions and hardstand areas (including upgrade of a short section of the L99997 local road);*
- xii. 5 no. borrow pits;*
- xiii. Spoil Management;*
- xiv. Biodiversity Management and Enhancement Plan measures (including establishment of a riparian planting, broadleaf woodland planting and hedgerow planting/enhancement);*
- xv. Tree felling and vegetation removal;*
- xvi. Site Drainage;*
- xvii. Operational stage site signage; and*

xviii. All ancillary site development works and apparatus.

The applicant is seeking a ten-year permission and an operational period of thirty-five-years for the wind turbines, meteorological mast, telecommunications relay mast and site signage from the date of full commissioning of the wind turbines. Permanent planning permission is being sought for all other works.

An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) have been prepared in respect of the proposed development and accompany this planning application. The EIAR and NIS include assessment of temporary accommodation works to facilitate the delivery of turbine components from Belview Port (Port of Waterford), Co. Waterford to the site entrances via the National Road network (N29, N25) and the Local Road network (L2024).

This application seeks a ten-year planning permission. The Proposed Project will have an estimated generating capacity of 145.2MW. A full description of the Proposed Project is provided in Chapter 4 of the EIAR. The Proposed Project layout is illustrated in Figure 1 below.

The following sections provide details on elements of the Proposed Project as outlined in the development description above. Further details of these project components can be found in Chapter 4 of the EIAR.

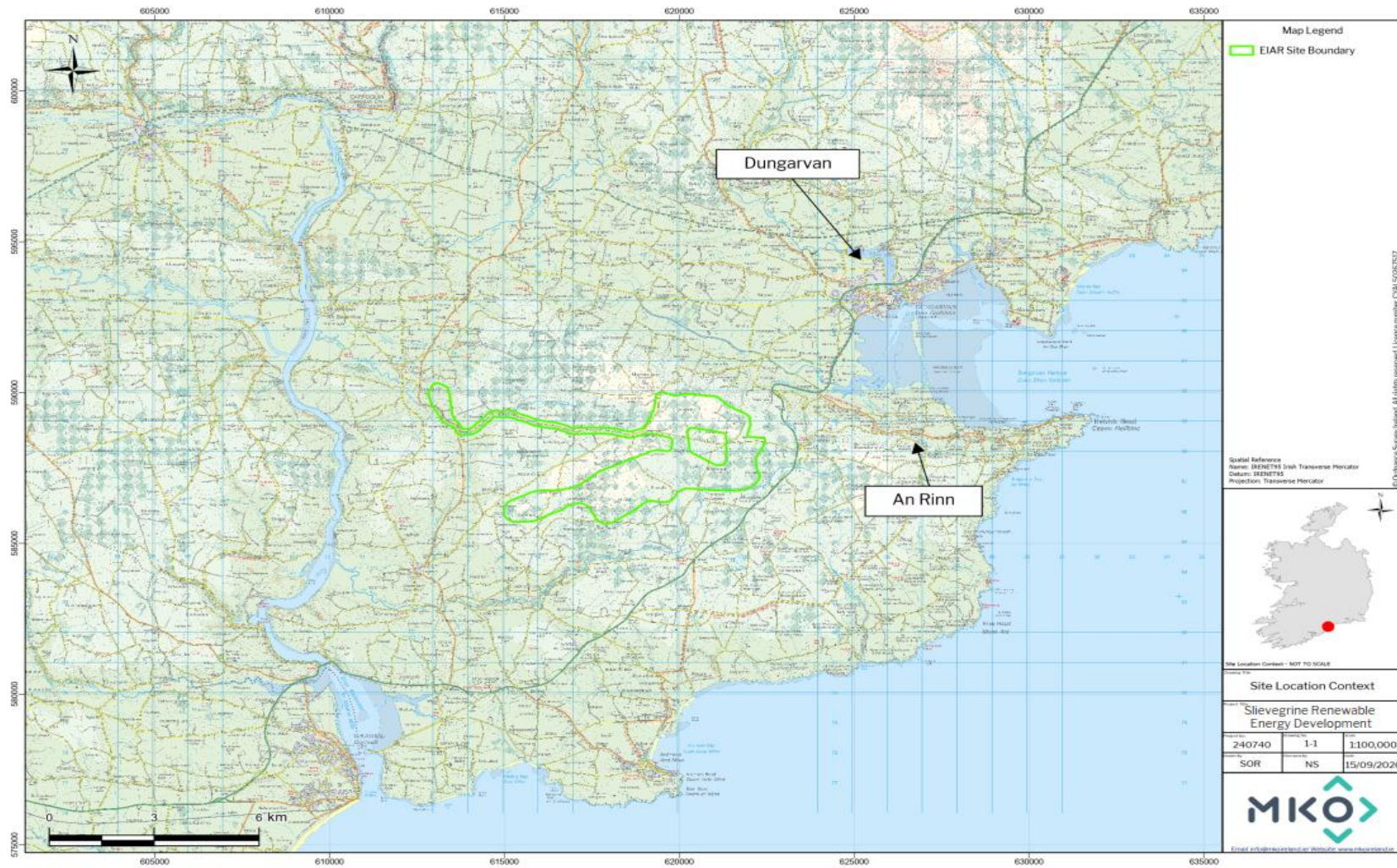


Figure 1: Proposed Site Location

(i) Turbines, Foundations & Hardstands

The proposed wind turbines to be installed on the Site will have the following dimensions:

- 6 no. wind turbines with an overall turbine tip height of 185 metres, a rotor blade diameter of 162 metres, and turbine hub height of 104 metres
- 15 no. wind turbines with an overall turbine tip height of 175 metres, a rotor blade diameter of 150 metres, and turbine hub height of 100 metres
- 2 no. wind turbines with an overall turbine tip height of 170 metres, a rotor blade diameter of 150 metres, and turbine hub height of 95 metres

Each wind turbine is secured to a reinforced concrete foundation that is installed below the finished ground level. Hard standing areas consisting of levelled and compacted hardcore are required around each turbine base to facilitate access, turbine assembly and turbine erection.

The final turbine selection will be the subject of a competitive tender process to determine the turbine manufacturer. The wind turbines will be conventional three-blade turbines, which will be geared to ensure the rotors of all turbines always rotate in the same direction. The turbines will be multi-ply coated to protect against corrosion, and it is proposed that the turbines would be of a light grey colour to blend into the sky background to minimise visual impact.

(ii) 110kV Substation, 220kV Loop-in Substation and Proposed Grid Connection

The Proposed Project includes a 110kV Substation to the Proposed 220kV Loop-in Substation in the townland of Ballycullane, Co Waterford via 110kV underground electrical cabling. The 110kV underground electrical cabling route is approximately 9km in length and located primarily within the public road corridor, with a short section (approximately 305m) located within a private forestry road west of the proposed on-site substation and another short section (approximately 815m) being located within proposed new access roads through agricultural pastures in the townlands of Graigue and Ballycullane.

It is proposed to construct a 110kV electricity substation within the Proposed Wind Farm site. The Proposed 110kV Substation is located within a forestry block and will be accessed via an existing forestry access junction off the L-2024 connected to the Proposed Wind Farm access roads.

The footprint of the Proposed 110kV Substation compound measures approximately 9,148 square metres in area and will include 2 no. control building, staff parking facilities and all electrical substation components necessary to consolidate the electrical energy generated by each wind turbine, and export that electricity from the Proposed 110kV Substation to the national grid. The construction and exact layout of electrical equipment in the Proposed 110kV Substation will be to ESB Networks specifications.

The Proposed 110kV Substation compound will include steel palisade fencing (approximately 2.6 metre high or as otherwise required by ESB), and internal fences will also segregate different areas within the main substation.

The Proposed 110kV Substation and 110kV underground electrical cabling will remain in place after the operational phase of the Proposed Wind Farm as they will be under the ownership and control of the ESB Networks and will form a permanent part of the national electricity grid.

(iii) Underground Electrical and Communications Cabling

Each turbine will be connected to the proposed onsite 110kV substation via underground 33 kV electricity cabling. Fibre-optic cables will also connect each wind turbine and the meteorological (met) mast to the

proposed onsite 110kV substation. The electricity and fibre-optic cabling connecting to the proposed onsite 110kV substation compound will be run in cable ducts beneath ground level, along the sides of roadways and/or under the roadways.

(iv) Site Drainage

The protection of the watercourses within and surrounding the Site, and downstream catchments that they feed is important to establish the most appropriate drainage proposals for the Proposed Project. The drainage design for the Proposed Project has been planned with the intention of having no significant negative impact on the water quality of the Site and its associated rivers, and consequently no impact on downstream catchments and ecological ecosystems. The assessment of potential impacts on hydrology and hydrogeology due to the construction, operation and decommissioning of the Proposed Project is included in Chapter 9: Hydrology and Hydrogeology.

No routes of any natural drainage features will be altered as part of the Proposed Project. Turbine locations and associated new roadways were designed to avoid natural watercourses with existing roads to be used wherever possible. There will be no direct discharges to any natural watercourses or land drains, with all drainage waters being dispersed as overland flows. All discharges from the proposed works areas will be made over vegetation filters at an appropriate distance from natural watercourses and drains. Buffer zones around the existing natural drainage features have been used to inform the layout of the Proposed Project

(v) Meteorological Mast

One meteorological (met) mast is proposed as part of the Proposed Wind Farm. The met mast will be equipped with wind monitoring equipment at various heights. The proposed met mast will be located at E620855, N589082 (ITM) as shown on the Proposed Wind Farm site layout drawing in Figure 4-4 of the EIAR and the detailed site layout drawings included as Appendix 4-1 of the EIAR. The met mast will be a free-standing slender lattice structure 80 metres in height. It will be constructed on a hard-standing area sufficiently large to accommodate the equipment that will be used to erect the mast. A standard detail of a meteorological mast is shown in Figure 4-16.

(vi) Site Access Roads

Approximately 9.7km of existing roads and access tracks will be upgraded as part of the Proposed Project construction phase. Approximately 13.5km of new roads will be constructed to facilitate the Proposed Project.

(viii) Borrow Pits

The 5-no. proposed onsite borrow pits as it is estimated that approx. 395,800m³ of stone material will be required to construct the Proposed Project (including a 10% contingency factor). See **Section 4.3.3.2** of the EIAR for further details.

(ix) Construction Compound s

There are 5 no. construction compounds in the Proposed Project. The construction compound will consist of a bunded refuelling and containment area for the storage of lubricants, oils and site generators etc, waste storage area, temporary site offices, staff facilities and car-parking areas for staff and visitors. See **Section 4.8.1.4** of the EIAR for further details.

(x) Forestry Felling

Tree felling will be required as part of the Proposed Project in order to accommodate the proposed turbines, access roads, underground cabling, substation and other ancillary infrastructure.

(xi) Biodiversity Enhancement Measures

Measures are to be implemented to ensure the Proposed Project will result in net gain biodiversity. The biodiversity enhancement measures are detailed in Appendix 6-4: Biodiversity Management and Enhancement Plan of this EIAR.

6.

PROPOSED PROJECT DESIGN PROCESS

The design of the Proposed Project has been an informed and collaborative process from the outset, involving the project designers, engineers, environmental, ecological, ornithological, hydrological, geotechnical, traffic consultants and archaeological specialists. The design process has also taken into account recommendations and comments of the relevant statutory and non-statutory organisations, the local community and the local authority where relevant.

The aim of the process being to reduce the potential for environmental effects while designing a commercially viable project capable of being constructed.

Throughout the design process, the layout of the Proposed Project has been revised and refined to take account of the findings of all desk-based assessments, site surveys/investigations and baseline assessments which have brought the design from its first initial layout to the current proposed layout.

6.1

Strategic Site Selection

As the cost of building each megawatt of electricity generating capacity in a wind farm is in the region of €1.5 million, it is critical that the most suitable site for the Proposed Project is chosen.

Site selection for the development of a wind farm must be suitable for consideration under a number of criteria, such as:

- **Planning Policy:** alignment with the wind energy strategy (i.e., in an area deemed ‘open to consideration’) of the relevant local authority
- **Environmental Sensitivities:** located outside areas designated for protection of ecological species and habitats;
- **Grid Connection:** access to the national electricity grid possible within a viable distance;
- **Sensitive Receptors:** capable of complying with required setbacks from sensitive receptors.
- **Site Scale:** sufficient area of unconstrained land that could potentially accommodate a wind farm development and turbine spacing requirements;

Having regard to these criteria, the Site is considered suitable for renewable energy development at the scale proposed. It is located in a rural area comprising primarily of commercial forestry, together with areas of agricultural pasture and rough grazing.

6.2

Detailed Constraints Mapping

The design of the Proposed Wind Farm has been informed by the *Wind Energy Development Guidelines* (Department of the Environment, Heritage and Local Government, 2006), the *Best Practice Guidelines for the Irish Wind Energy Industry* (Irish Wind Energy Association, 2012) and the *Draft Revised Wind Energy Development Guidelines* (Department of Housing, Planning and Local Government, 2019).

A constraints map was prepared following desk-based assessment and field surveys. As shown in **Figure 3-2**, the principal constraints and associated buffers included:

- **Sensitive Receptors:** a minimum 500m setback from all sensitive receptors achieving the Guidelines (DoEHLG, 2006) recommended setback of 500m and a 680m, 700m or 740m setback (dependant on turbine height in proximity to the sensitive receptor) from third party sensitive receptors and achieving the Draft Guidelines (DoHPLG, 2019) recommended setback of 4 x tip height separation distance from third party sensitive receptors.
- **Natura 2000 sites** plus 200-metre infrastructure/excavation buffer;

- > **Hydrology:** Watercourses plus 50-metre buffer where possible;
- > **Archaeological Sites or Monuments;** minimum 30-metre buffer, plus ‘Zone of Notification’ as required by the National Monuments Service (ROI);
- > **Habitats and Biodiversity:** Species specific buffers. Siting of infrastructure so as to minimise loss of habitats of Local Importance (higher value) and higher.

The Site also benefits from an acceptable wind resource, proximity to the national grid, existing access infrastructure, the potential availability of suitable construction materials on site and a sufficient area of developable land.

The constraints mapping process identified the areas potentially suitable for development. The layout was then progressively refined having regard to the findings of the ecological, ornithological, hydrological, geotechnical, noise, landscape and visual, and shadow flicker assessments.

6.3

Turbine Layout Design Process

The final turbine layout is the outcome of an iterative design process informed by environmental surveys, technical investigations, pre-application consultation and ongoing engagement with landowners and the local community. The layout takes account of identified constraints and buffer zones, turbine separation requirements, wind yield, access and constructability, while seeking to avoid or minimise potential environmental effects.

Further details of the design process and the principal layout iterations are provided in **Chapter 3, Section 3.2.5.2**, of the EIAR.

7.

PLANNING POLICY OVERVIEW

An extensive and complete planning policy context in respect of the Proposed Project is included in Chapter 2 of the EIAR. For this report, and for conciseness, the compliance summary table (Table 2) sets out an assessment of the Proposed Project in the context of relevant international, national, and regional policy. Local policy is discussed in Section 7.1 of this planning report.

Table 2: International, European, National and Regional Policy Compliance Table

Policy or legislative document	Relevant requirement or objective	Proposed Project response
Planning and Development Act 2000, as amended	Sections 37A to 37J and the Seventh Schedule of the Act provide the current strategic infrastructure development route. The Seventh Schedule includes wind farms with more than 25 turbines or a total output greater than 50 MW.	The Proposed Project has 23 turbines and an estimated output of 145.2 MW. It exceeds the 50 MW threshold, the section 37B process has concluded, and the application is being made under section 37E of the Act.
Planning and Development Act 2024, as amended	The 2024 Act, as amended by the Planning and Development (Amendment) Act 2026, is being commenced in phases. As of the date of submission of this planning application, the principal development-consent provisions in Part 4 have not yet been commenced. Section 626 contains transitional provisions for applications made under the Act before the relevant repeal.	The application is being prepared under section 37E of the Act. The commencement and transitional position have been rechecked immediately before lodgement.
Directive (EU) 2023/2413 and Irish transposing regulations	RED III sets a binding EU renewable-energy target of at least 42.5% by 2030, with a 45% collective ambition, and introduces renewable-energy permitting measures. Article 16f applies when specified legal interests are balanced under EU environmental law.	The Proposed Project would add renewable generation and associated grid infrastructure and will increase Ireland's renewable energy share, contributing towards Ireland's climate and energy obligations under EU law.
EIA Directive and Planning and Development Regulations 2001, as amended	Class 3(i) of Part 2 of Schedule 5 requires EIA for installations with more than five turbines or total output greater than 5 MW.	The Proposed Project exceeds both thresholds. An EIAR accompanies the application and provides information to assist ACP in carrying out EIA.
Habitats Directive, Birds Directive and Water Framework Directive	The Commission must comply with the applicable requirements for Appropriate Assessment, species protection and the protection of water-body objectives, including the no-deterioration principle.	An NIS, biodiversity assessment and Water Framework Directive assessment accompany the application. ACP will determine compliance through the statutory assessments.
Climate Action and Low Carbon Development Act 2015, as amended	Section 15 requires relevant bodies, in so far as practicable, to perform their functions consistently with the specified climate plans and objectives. The Coolglass judgement confirms that the duty is real and enforceable but does not create an automatic presumption in favour of permission.	The Proposed Project would add approximately 145.2 MW of renewable generation. Its climate contribution is material and must be considered in accordance with proper planning, Development Plan policy and environmental law.
Climate Action Plan 2025	CAP25 targets 9 GW of installed onshore wind capacity and an 80% renewable-electricity share by 2030.	If permitted, the Proposed Project would contribute approximately 145.2 MW towards the onshore-wind target and supply renewable electricity to the national grid.
National Planning Framework First Revision 2025	NPO 69 integrates climate considerations into planning; NPO 70 supports renewable energy at environmentally sustainable and	The Proposed Project is in line with the objectives of the National Planning Framework First Revision 2025 which

	compatible locations; and NPO 71 supports reinforcement of the electricity grid.	seeks to transition to a carbon neutral and climate resilient society. If permitted, the Proposed Project will contribute to the achievement of National Policy Objectives 69, 70 and 71.
National Development Plan Review 2025	The reviewed National Development Plan supports investment in renewable generation, electricity networks and the transition to a climate-neutral and resilient economy.	The Proposed Project would provide renewable generation and related grid infrastructure consistent with the direction of national capital and energy policy.
National Energy Security Framework and Energy Security Package	These policies support reduced reliance on imported fossil fuels, a renewables-led electricity system and resilient energy infrastructure.	The Proposed Project would add indigenous renewable generation, and the connection infrastructure required to export it to the national grid.
Wind Energy Development Guidelines for Planning Authorities 2006 and Draft Revised Guidelines 2019	The operative the Guidelines (DoEHLG, 2006) address siting, landscape, noise, shadow flicker, access, grid connection and community consultation. The Draft Guidelines (DoHPLG, 2019) remain draft guidance.	The design has been informed by the Guidelines (DoEHLG, 2006) and has had regard to the Draft Guidelines (DoHPLG, 2019). The relevant technical assessments and achieved separation distances are provided in the application documents.
Regional Spatial and Economic Strategy for the Southern Region 2020-2032	RPOs 87, 96, 98, 99 and 221 support a low-carbon future, renewable energy and electricity-grid infrastructure at appropriate locations, subject to environmental assessment and the planning process.	The Proposed Project would provide renewable generation and associated grid infrastructure in the Southern Region. Its locational and environmental suitability is assessed in the application documents.

7.1 Local Planning Policy

7.1.1 Waterford City & County Development Plan 2022 2028

The Proposed Project is located within the functional area of WCCC, and the relevant policy document is the Waterford City and County Development Plan (WCCDP) 2022 – 2028 which was adopted on the 7th of June 2022 and came into effect on the 19th of July 2022. Variation no. 1 was made by WCCC on the 13th of November 2025. The WCCDP sets out the strategy for the proper planning and sustainable development of the City and County over the plan period from 2022 to 2028.

The policies of the WCCDP incorporate climate change mitigation and adaptation strategies. The strategic vision of the WCCDP is underpinned by a number of overarching goals. Of these, the following goals are considered relevant to the Proposed Project:

Core Strategic Aims 2.1.8

“Implement the Waterford City and County Council Climate Adaptation Strategy 2019 (as amended) and promote a climate resilient pattern of development and land uses which assists in achieving national climate change mitigation and adaption targets.”

2.18 Core Strategy Policy Objectives

CS 02 *“UN Sustainable Development Goals: Through implementation of the Core Strategy and the policy objectives of the Development Plan we will contribute, as practicable, towards achievement of the 17 Sustainable Development Goals of the United Nations’ 2030 Agenda for Sustainable Development, which came into force in 2016 and the outcomes derived there from as set out in Section 1.6 of Chapter 1 of the Development Plan.”*

CS 09 *“Low Carbon Future: Through the implementation of the Core and Settlement Strategies, we will put in place a pattern of land use and associated policy objectives and actions, which facilitate a just transition to a low carbon society.”*

Chapter 6 of the WCCDP 2022-2028 recognises the urgent need to move from fossil fuels to renewable and carbon neutral forms of heating and energy provision. County Waterford’s role in the delivery of renewable energy resources is acknowledged within the WCCDP, demonstrated by the strategic objective

“to promote and facilitate the provision of energy efficient, low carbon infrastructure and utilities and support infrastructure, whilst supporting industry to innovate, decarbonising the energy sector in order to contribute to a national target of zero net emissions of greenhouse gases in Ireland by 2050.”

The WCCDP identifies the following objectives to in relation to renewable energy:

Policy Objective UTL 13 Renewable Energy states that -

“It is the policy of Waterford City and County Council to promote and facilitate a culture of adopting energy efficiency/renewable energy technologies and energy conservation and seek to reduce dependency on fossil fuels thereby enhancing the environmental, social and economic benefits to Waterford City and County. It must also be recognised that other sources of electricity generation such as natural gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand.”

“The Council recognizes and supports the role that the County can play in facilitating the onshore infrastructure required for the construction, operation and maintenance of offshore wind farm developments. This infrastructure includes but is not limited to: construction facilities, storage and lay-down areas, cable landfalls, onshore cable routing to substations, port and harbour infrastructure and coastal operations and maintenance bases, as well as use, reuse or repowering of existing infrastructure where appropriate.”

“Promote and encourage the use of renewable energy, and low carbon resources, namely solar photovoltaic, geothermal, heat pumps, district heating, solar thermal, hydro, tidal power, offshore and onshore wind, biomass as well as micro-generation among business, agriculture, education, health, and other sectors.”

“To support in conjunction with other relevant agencies, wind energy initiatives, both onshore and offshore, and wave energy, and onshore grid connections and reinforcements to facilitate offshore renewable energy development when these are undertaken in an environmentally acceptable manner.”

Table 6.3 of the WCCDP identifies a 2030 onshore-wind target of 211.20 MW for County Waterford.

The Proposed Project would add approximately 145.2 MW of installed onshore-wind capacity and would therefore make a material contribution to the county target and to the transition away from fossil-fuel electricity generation.

The elements of UTL 13 particularly relevant to the Proposed Project include:

- supporting renewable-energy delivery towards the targets in Table 6.3 of the WCCDP;
- assessing generation, transmission and distribution infrastructure in accordance with the Waterford Renewable Energy Strategy, its wind-energy designation map, the Waterford Landscape and Seascap Character Assessment and national wind-energy guidance;
- promoting renewable-energy generation and low-carbon resources;
- supporting effective community engagement and participation;
- considering reasonable alternatives and the efficient use of existing assets; and
- providing for decommissioning and restoration.

The Proposed Project combines onshore wind generation with the grid infrastructure required to connect it to the existing transmission system. In considering its consistency with UTL 13, regard has been had to the Site’s Preferred Area designation, the detailed landscape and environmental assessments, the reasonable alternatives considered, the community engagement undertaken and the commitments set out in the application documentation.

The WCCDP therefore provides positive policy support for the principle of the Proposed Project, subject to compliance with its detailed criteria and ACP’s assessment of the project-specific effects.

Table 3 summarises the principal Development Plan policies relevant to the Proposed Project and identifies how they are addressed in the application documentation.

Table 3: Compliance with WCCDP Policies & Objectives

Policy	Relevant requirement	Proposed Project response
WCCDP CS 06 – Core Strategy Policy Objectives	Environmental Directives <i>We will require, where appropriate, all plans and projects within Waterford to comply with the requirements of the Strategic Environmental Assessment Directive, the Habitats Directive, Water Framework Directive and Floods Directive.</i>	The Proposed Project is aligned with WCCDP CS 06 through its compliance with the EU Habitats Directive, Water Framework Directive, EIA Directive, Floods Directive and Birds Directive in preparation of the EIAR and relevant technical assessments.
WCCDP CS 09 – Core Strategy Policy Objectives	Low Carbon Future <i>Through the implementation of the Core and Settlement Strategies, we will put in place a pattern of land use and associated policy objectives and actions, which facilitate a just transition to a low carbon society.</i>	The Proposed Project is broadly aligned with the local transition to renewable energy and with community-participation objectives. It does not rely on the Council's own-emissions target as a direct development-management test.
WCCDP 9.0 Climate Action, Biodiversity & Environment	It is an objective of Waterford City & County Council to: <i>a) Integrate climate change and adaptation considerations into land-use policy objectives and decision-making processes to enhance our resilience to the effects of Climate Change and reducing our carbon footprint.</i> <i>We will protect, manage, and enhance the natural heritage, biodiversity, landscape and environment of Waterford City and County in recognition of its importance as a non-renewable resource, providing a unique identity and character for the City and County as a natural resource asset.</i>	The Proposed Project is consistent with WCCDP 9.0 by supporting the transition to renewable energy and contributing to the reduction of greenhouse gas emissions associated with electricity generation. The development has also been designed and assessed with regard to the protection of biodiversity, natural heritage, landscape and the wider environment, with appropriate mitigation measures proposed to avoid and reduce potential environmental effects.
WCCDP CA01 Climate Action and Adaptation	It is an objective of the Waterford City & County Council to:	The Proposed Project supports the objectives of WCCDP CA01 by contributing to climate

Policy	Relevant requirement	Proposed Project response
	<i>a) To support and implement the policies of the Waterford Climate Adaptation Strategy in collaboration with Waterford Climate Action Team the Climate Action Regional Office (CARO), and review/replace the strategy pursuant to the provisions of the Climate Action Plan 2021 and Low Carbon Development Act. We will vary the Development Plan as necessary following the review/ replacement of the strategy.</i>	action and the transition towards a low-carbon energy system. The generation of renewable electricity will reduce reliance on fossil-fuel-based generation and contribute to increased renewable energy capacity.
WCCDP UTL 01 New Development and WCCDP Strategic Development Growth Areas	<i>Ensure that new development across the urban and rural settlements of Waterford is infrastructure led in a manner which:</i> <i>• Supports communities and economic growth and development,</i> <i>• Enhances environmental quality,</i> <i>• Complies with the tiered approach to land use zoning which underpins the Development Plan.</i> <i>• Encourages and provides opportunities to improve and implement sustainable modes of travel.</i> <i>• Integrates nature-based solutions and climate change considerations into the design, planning, and implementation of infrastructure provision/ works and development proposals.</i> <i>• Incorporates green infrastructure to provide for carbon offset and carbon sinks and wider environmental benefits, including providing shade to alleviate heat stress, supporting urban biodiversity, water retention and flood alleviation.</i> <i>• Promotes and integrates energy efficiency and low carbon technologies and solutions; and,</i> <i>• Ensures sufficient heat density (e.g. compact growth) and diversity of connected heat loads (egg hospital, leisure centre, large retail, electricity production, industry) to facilitate the economic provision, viability and</i>	The Proposed Project is consistent with this policy objective through the provision of renewable energy infrastructure which supports the sustainable economic development of Waterford and the transition to a low-carbon energy system. The development has been designed having regard to environmental and climate considerations, including the protection of environmental quality, incorporation of appropriate nature-based solutions and sustainable infrastructure provision. The generation of renewable electricity will further support energy efficiency and the increased use of low-carbon technologies within the County.

Policy	Relevant requirement	Proposed Project response
	<i>integration/ implementation of low carbon heating technologies in development proposals</i>	
WCCDP UTL 13 - Utility, Energy & Communication Policy Objectives	Renewable Energy <i>It is an objective of the Waterford City & County Council to:</i> <i>To promote and facilitate a culture of adopting energy efficiency/ renewable energy technologies and energy conservation and seek to reduce dependency on fossil fuels thereby enhancing the environmental, social and economic benefits to Waterford City and County. It must also be recognised that other sources of electricity generation such as natural gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand.”</i> <i>Supporting the delivery of renewable energy to achieve the targets identified in Table 6.3 of the Development Plan.</i> <i>Facilitating and encouraging, where appropriate, proposals for renewable energy generation, transmission and distribution and ancillary support infrastructure facilities including the necessary infrastructure required for the development of offshore renewable energy developments developed fully in accordance with the Waterford Renewable Energy Strategy, the wind energy designation map (Appendix 2 of the RES), the Waterford Landscape and Seascape Character Assessment undertaken to inform this Development Plan, and the National Wind Energy Guidelines, or any subsequent update/ review of these</i> <i>The Council recognizes and supports the role that the County can play in facilitating the onshore infrastructure required for the construction, operation</i>	The Proposed Wind Farm is located within a ‘Preferred Area’ for wind energy development, with the Proposed Grid Connection providing connection to existing transmission infrastructure. The Proposed Project has been designed and assessed having regard to reasonable alternatives, landscape and environmental effects, consultation and decommissioning, as detailed in the relevant reports and plans.

Policy	Relevant requirement	Proposed Project response
	<i>and maintenance of offshore wind farm developments. This infrastructure includes but is not limited to: construction facilities, storage and lay-down areas, cable landfalls, onshore cable routing to substations, port and harbour infrastructure and coastal operations and maintenance bases, as well as use, reuse or repowering of existing infrastructure where appropriate.</i> • <i>The Wind Energy Designation Map and the Landscape and Seascape Character Assessment Map identify different landscape character areas and associated landscape sensitivities. These designations encompass the concept of buffers between areas of sensitivity which vary across the different landscape character types and their different locations. These buffers allow for a gradual change between contrasting landscape sensitivities and associated wind energy designations to be considered, as necessary, when determining any development proposal.</i> • <i>Promote and encourage the use of renewable energy, and low carbon resources, namely solar photovoltaic, geothermal, heat pumps, district heating, solar thermal, hydro, tidal power, offshore and onshore wind, biomass as well as micro-generation among business, agriculture, education, health, and other sectors.</i> • <i>Promoting, encouraging, ensuring, and facilitating community engagement, participation and implementation of/ in renewable energy projects.</i> • <i>Implementing, including in the Council's own activities and in the provision of services/ works, the use and integration of low carbon, renewable energy infrastructure and technologies.</i> • <i>Supporting appropriate options for, and provision of, low carbon and renewable energy technologies and facilities, including the development and provision of district heating (and/ or other low carbon heating technologies); anaerobic digestion and the extraction of energy and other resources from sewerage sludge.</i> • <i>The preparation and implementation of a Climate Action Plan (including adaptation and mitigation measures) for Waterford.</i>	

Policy	Relevant requirement	Proposed Project response
	To support in conjunction with other relevant agencies, wind energy initiatives, both onshore and offshore, and wave energy, and onshore grid connections and reinforcements to facilitate offshore renewable energy development when these are undertaken in an environmentally acceptable manner. At initial design stage full consideration should be to reasonable alternatives and existing infrastructural assets. In this regard environmental assessments should address reasonable alternatives for the location of new energy developments, and where existing infrastructural assets such as sub-stations, power lines and roads already exist within proposed development areas, then such assets should be considered for sustainable use by the proposed development where the assets have capacity to absorb the new development. All planning applications for Renewable Energy Projects such as wind farms and solar farms shall be accompanied by a Decommissioning and Restoration Plan (DRP) consistent with the Wind Energy Guidelines 2006 or any update thereof. Issues to be addressed shall include details of proposed restorative measures, the removal of above ground structures and equipment, the restoration of habitats, landscaping and/or reseeded roads etc.	
WCCDP UTL 14 - Utility, Energy & Communication Policy Objectives	Energy-Developments and Human Health Energy Developments & Human Health Proposals for energy development should demonstrate that human health has been considered, including those relating to the topics of: Noise (including consistency with the World Health Organisation's 2018 Environmental Noise Guidelines for the European Region developments must comply with the Wind Energy Development Guidelines (2006), or any subsequent update/review of these),	The Proposed Project has been designed and assessed having regard to potential impacts on human health and residential amenity arising from the development. In particular, the assessment considers matters including noise, shadow flicker, ground conditions, geology, air quality and water quality, with appropriate mitigation measures incorporated where required. On this basis, the development is considered capable of operating without

Policy	Relevant requirement	Proposed Project response
	• <i>Shadow Flicker (for wind turbine developments, including detailed Shadow Flicker Study),</i> • <i>Ground Conditions/Geology (including landslide and slope stability risk assessment),</i> • <i>Air Quality; and,</i> • <i>Water Quality.</i>	significant adverse effects on human health or the surrounding environment.
WCCDP UTL 19 - Utility, Energy & Communication Policy Objectives	Undergrounding Cables <i>Where undergrounding of cables is being pursued, proposals should demonstrate that environmental impacts including the following are minimised:</i> • <i>Habitat loss as a result of removal of field boundaries and hedgerows (right of way preparation) followed by topsoil stripping (to ensure machinery does not destroy soil structure and drainage properties).</i> • <i>Short to medium term impacts on the landscape where, for example, hedgerows are encountered.</i> • <i>Impacts on underground archaeology.</i> • <i>Impacts on soil structure and drainage; and</i> • <i>Impacts on surface waters as a result of sedimentation.</i>	The Proposed Project supports WCCDP UTL 19 through the undergrounding of electrical cabling where appropriate. The cable route and associated works have been designed to minimise potential effects on habitats and hedgerows, landscape, archaeology, soils and drainage, and surface waters. Appropriate mitigation measures will be implemented during construction to minimise disturbance and prevent sedimentation and other potential environmental effects.
WCCDP UTL21 - Utility, Energy & Communication Policy Objectives	Construction and Environmental Management Plan <i>Construction Environment Management Plans shall be prepared in advance of the construction of relevant projects and implemented throughout. Such plans shall incorporate relevant mitigation measures which have been integrated into the Plan and any lower tier Environmental Impact Statement or Appropriate Assessment.</i>	A Construction and Environmental Management Plan (CEMP) has been prepared and will be implemented for the construction phase of the Proposed Project. The CEMP will incorporate the relevant mitigation and environmental protection measures identified through the environmental assessment process

Policy	Relevant requirement	Proposed Project response
		and will provide a framework for their effective implementation throughout construction.
WCCDP UTL22 - Utility, Energy & Communication Policy Objectives	Construction Wastes <i>We will safeguard the environment by seeking to ensure that residual waste is disposed of appropriately. All waste arising during construction will be managed and disposed of in a way that ensures the provisions of the Waste Management Acts and the Southern Waste Management Plan 2015-2021.</i>	The Proposed Project is aligned with this policy through the management of construction waste in accordance with applicable waste management legislation and relevant waste management requirements. Waste arising during construction will be appropriately segregated, stored, reused or recycled where practicable, with residual waste disposed of at suitably authorised facilities.
WCCDP UTL 24- Utility, Energy & Communication Policy Objectives	Electricity Infrastructure <i>Subject to appropriate environmental assessment and compliance with the policy objectives and development management standards of the development plan, support and facilitate the development of a safe, secure and reliable supply of electricity, associated electricity networks and transmission infrastructure to serve existing and future demand.</i>	The Proposed Project will provide 145.2 MW of renewable electricity generation, supported by the infrastructure required to connect the development to the national grid. The Proposed Project will therefore increase indigenous renewable generation and support a safe, secure and reliable electricity supply.
WCCDP L01 – Landscape	National Landscape Strategy <i>We will support provisions of the 2014 National Landscape Strategy and provide for the sustainable management of all of County Waterford’s landscapes including archaeological landscapes, waterway corridors, coastal, upland, rural and peri-urban landscapes.</i>	The Proposed Project has been designed in accordance with WCCDP L02. A Landscape and Visual Impact Assessment (LVIA) has been prepared to assess the potential effects of the Proposed Project on landscape character and visual amenity. The assessment has been undertaken having regard to the landscape policies, objectives and landscape character designations of the WCCDP and has informed

Policy	Relevant requirement	Proposed Project response
		the siting and design of the Proposed Project to minimise potential landscape and visual effects and ensure alignment with local landscape policy.
WCCDP L02 – Landscape	Protecting our Landscape and Seascape <i>We will protect the landscape and natural assets of the County by ensuring that proposed developments do not detrimentally impact on the character, integrity, distinctiveness or scenic value of their area and ensuring that such proposals are not unduly visually obtrusive in the landscape, in particular, in or adjacent to the uplands, along river corridors, coastal or other distinctive landscape character units.</i>	The Proposed Project has been assessed in the context of the existing landscape character, visual amenity and sensitivity of the receiving environment. The layout, turbine locations and associated infrastructure have been developed to minimise potential landscape and visual effects, while the accompanying landscape and visual assessment identifies the likely effects of the proposal and appropriate mitigation measures. The development is therefore considered to have had due regard to the protection of Waterford's landscape character and visual amenity.
WCCDP L03- Landscape	Landscape and Seascape Character Assessment <i>We will assess all proposals for development outside of our settlements in terms of the 2020 Landscape and Seascape Character Assessment (Appendix 8) and the associated sensitivity of the particular location. We will require a Landscape and Visual Impact Assessment (LVIA) for proposed developments with the potential to impact on significant landscape features within the City and County. Proposals for significant development (e.g. renewable energy projects, telecommunications and other infrastructure and the extractive industry) shall be accompanied by a LVIA which includes Zones of Theoretical Visibility (ZTV) which indicate the landscape impact zone within which the proposed development may be seen. There will be a</i>	The Proposed Project has been designed and assessed having regard to the existing landscape character and visual amenity of the receiving environment. The siting and layout of the turbines and associated infrastructure seek to minimise potential landscape and visual effects, while the LVIA considers the sensitivity and character of the surrounding landscape, key views and visual receptors. Appropriate mitigation measures will be incorporated where required to reduce potential effects, and the

Policy	Relevant requirement	Proposed Project response
	<i>presumption against developments which are located on elevated and exposed sites and where the landscape cannot accommodate such development with reasonable and appropriate mitigation.</i>	development is therefore considered to be consistent with the objectives of WCCDP L03.
WCCDP L 04- Landscape	Scenic Routes and Protected Views <i>We will protect the scenic routes and specified protected views identified in our Landscape Character Assessment (Appendix 8), including views to and from the sea, rivers, landscape features, mountains, landmark structures and urban settlements from inappropriate development that by virtue of design, scale, character or cumulative impact would block or detract from such views.</i>	The Proposed Project is consistent with this policy. A LVIA has been prepared having regard to the scenic routes and protected views identified in the WCCDP and its Landscape Character Assessment. The assessment considers the potential landscape, visual and cumulative effects of the Proposed Project and has informed the siting and design of the development to minimise potential effects on identified scenic routes, protected views and sensitive landscape features.
WCCDP BD 03 - Biodiversity	<i>All proposed development will be considered in terms of compliance with the standards and legal requirements of the following where they apply;</i> <i>Appropriate Assessment of Plans and Projects in Ireland-Guidance for Planning Authorities Department of Housing, Local Government and Heritage (2021).</i> <i>NRA Guidelines on Ecological Impact Assessment (2009)</i> <i>All-Ireland Pollinator Plan (2021)</i> <i>Planning for Watercourses in the Urban Environment (2020)</i> <i>Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites.</i>	The Proposed Project has been designed and assessed having regard to the protection of biodiversity and the ecological characteristics of the receiving environment. Potential effects on habitats, flora and fauna, including protected and sensitive species, have been considered through the ecological assessment process, with appropriate avoidance, mitigation and, where required, enhancement measures incorporated into the Proposed Project. The development therefore seeks to ensure that significant adverse effects on biodiversity are avoided and is considered consistent with the objectives of WCCDP BD03.

Policy	Relevant requirement	Proposed Project response
WCCDP BD 04 - Biodiversity	Appropriate Assessment <i>All projects and plans arising from this Plan will be screened for the need to undertake Appropriate Assessment under Article 6 of the Habitats Directive. A plan or project will only be authorised after the competent authority has ascertained, based on scientific evidence, Screening for Appropriate Assessment, and subsequent Appropriate Assessment where necessary, that:</i> <i>1. The plan or project will not give rise to significant direct, indirect or secondary effects on the conservation objectives of any European site (either individually or in combination with other plans or projects); or</i> <i>2. The plan or project will have significant adverse effects on the integrity of any European site (that does not host a priority natural habitat type/and or a priority species) but there are no alternative solutions and the plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of Natura 2000; or</i> <i>3. The plan or project will have an adverse effect on the integrity of any European site (that hosts a natural habitat type and/or a priority species) but there are no alternative solutions and the plan or project must nevertheless be carried out for imperative reasons for overriding public interest, restricted to reasons of human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest. In this case, it will be a requirement to follow procedures set out in legislation and</i>	The Proposed Project has been designed and assessed having regard to the protection of European sites and their conservation objectives. A Screening for Appropriate Assessment has been undertaken, accompanied by a Natura Impact Statement (NIS) assessing the potential effects on European sites, including in-combination effects. The Proposed Project is therefore considered consistent with the Appropriate Assessment requirements of the WCCDP.

Policy	Relevant requirement	Proposed Project response
	<i>agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of Natura 2000.</i>	
WCCDP BD 05- Biodiversity	Protection of European Sites <i>Projects giving rise to adverse effects on the integrity of European sites (cumulatively, directly or indirectly) arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall not be permitted except as provided for in Article 6(4) of the Habitats Directive, viz. There must be a) no alternative solution available, b) imperative reasons of overriding public interest for the project to proceed; and c) Adequate compensatory measures in place.</i>	The EIAR and NIS demonstrate that the Proposed Project will not result in significant adverse effects on the environment or adversely affect the integrity of any European Site.
WCCDP BD 07 - BD 09 Biodiversity	BD 07: <i>We will protect plant and animal species and habitats which have been identified by the EU Habitats Directive (1997), EU Bird Directive (1979), Wildlife Act (1976) and Wildlife (Amendment) Act 2000 and the Flora Protection Order (2015) and ensure development does not impact adversely on wildlife species or the integrity and habitat value of the site.</i> BD 08: <i>We will assess all proposed developments at each level of the Development Planning process from City & County Development Plan, Local Area Plan to project level to determine potential for significant effects on the conservation objectives and /or adverse impact on the integrity of the Natura 2000 network and ensure that the requirements of Articles 6(3) and 6(4) of the Habitats Directive are fully satisfied.</i>	The NIS, biodiversity and ornithology assessments and Biodiversity Management and Enhancement Plan address these matters. The enhancement measures include riparian, broadleaf woodland and hedgerow planting and enhancement.

Policy	Relevant requirement	Proposed Project response
	<i>BD 09: We will ensure a sufficient level of information is provided in development applications to enable a fully informed assessment of impacts on biodiversity to be made. Ecological impact assessments submitted in support of development proposals shall be carried out by appropriately qualified professionals and ecological survey work carried out at optimal survey time to ensure accurate collation of ecological data.</i>	
WCCDP BD 23 - BD Trees & Woodlands Policy Objectives	Trees & Woodlands Policy Objectives <i>Where development proposals require felling of mature trees a comprehensive tree survey carried out by a suitably qualified arborist shall be submitted assessing the condition, ecological and amenity value of the treestock proposed for removal and mitigation planting and management scheme. We will seek in all cases to ensure when undertaking development or when permitting development that the loss of or damage to existing trees is minimised.</i>	The Proposed Project has been designed to minimise the loss of and potential damage to existing trees and vegetation. Appropriate avoidance and mitigation measures have been incorporated into the project design and will be implemented throughout the EIAR, including measures to protect retained trees and vegetation during construction and appropriate reinstatement and planting where required.
WCCDP WQ 01 – Water Policy Objectives	Water Framework Directive and Associated Legislation <i>We will contribute towards, as appropriate, the protection of existing and potential water resources, and their use by humans and wildlife, including rivers, streams, wetlands, the coastline, groundwater and associated habitats and species in accordance with the requirements and guidance in the EU Water Framework Directive 2000 (2000/60/EC), the European Union (Water Policy) Regulations 2003 (as amended), the European Communities Environmental Objectives (Surface Waters) Regulations 2009 (as amended), the Groundwater Directive 2006/118/EC and the European Communities Environmental Objectives (groundwater) Regulations 2010 (as</i>	The hydrology and hydrogeology assessment, Water Framework Directive assessment, drainage design and construction controls address potential effects from foundations, roads, crossings, felling and grid works.

Policy	Relevant requirement	Proposed Project response
	<i>amended) and other relevant EU Directives, including associated national legislation and policy guidance (including any superseding versions of same). To support the application and implementation of a catchment planning and management approach to development and conservation, including the implementation of Sustainable Drainage System techniques for new development.</i>	
WCCDP WQ 02 – Water Policy Objectives	Achieving High/ Good Water Quality Status <i>In order to maintain water quality at high status and a return to good status for rivers that are not meeting this threshold at present we will:</i> <i>Provide for the efficient and sustainable use and development of water resources and water services infrastructure.</i> <i>Manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment.</i> <i>Ensure that all development does not negatively impact on water quality and quantity, including surface water, ground water, designated source protection areas, river corridors and associated wetlands, estuarine waters, coastal and transitional waters.</i> <i>Ensure new development complies with the relevant EPA Code of Practice: Domestic Wastewater Treatment Systems (PE ≤ 10) (2021) or any amendments thereto.</i> <i>Screen planning applications according to their Water Framework Directive status and have regard to their status and objectives to achieve ‘good’ status or protect and improve ‘high or good status’. A catchment-based approach shall be applied to the assessment of planning applications which may impact on water quality, and to ensure that the development would not result in a reduction in the water quality status of a waterbody in that catchment.</i> <i>Seek to protect, enhance and restore all groundwaters and ensure a balance of abstraction and recharge, with the aim of achieving good groundwater</i>	The hydrology and hydrogeology assessment, Water Framework Directive assessment, drainage design and construction controls demonstrate that the Proposed Project has been designed to protect water quality and avoid adverse effects on surface water and groundwater. Appropriate mitigation measures address potential water quality effects associated with turbine foundations, access roads, watercourse crossings, forestry felling and grid connection works, including the control of sediment, runoff and potential pollutants during construction.

Policy	Relevant requirement	Proposed Project response
	<i>status and to reverse any significant and sustained upward trends in the concentration of pollutants in groundwater.</i> • <i>Work with the Local Authority Waters Programme and other relevant State agencies and local communities to achieve the objectives for the Areas for Action1 identified in the River Basin Management Plans 2018-2021 and 2022-2027 to ensure that new development do not result in a deterioration of water quality in these areas.</i> • <i>Develop the associated Blue Dot Catchment network programme under the River Basin Management Plan 2018-2021 to protect and maintain the excellent quality of 'High' status water bodies.</i>	
WCCDP WQ 03 – Water Policy Objectives	River Basin Management Plan <i>Support the implementation of the relevant recommendations and measures as outlined in the River Basin Management Plan 2018-2021, and associated Program of Measures, or any such plan that may supersede same during the lifetime of the plan. Proposed plans, program and projects shall not have an unacceptable impact on the water environment, including surface waters, groundwater quality and quantity, river corridors and associated woodlands. Also, to have cognisance of, where relevant, the EU's Common Implementation Strategy Guidance Document No. 20 and 36 which provide guidance on exemptions to the environmental objectives of the Water Framework Directive.</i>	The Proposed Project has been designed and assessed to protect surface water and groundwater quality and maintain the objectives of the Water Framework Directive and River Basin Management Plan. The hydrology and hydrogeology assessment, Water Framework Directive assessment, drainage design and construction controls address potential effects associated with foundations, access roads, watercourse crossings, forestry felling and grid connection works. Appropriate mitigation measures will control sediment, runoff and potential pollutants, ensuring the protection of the receiving water environment and water quality.
WCCDP ENV 01 - Regulatory Framework	<i>Through implementation of the Development Plan we will cumulatively contribute towards – in combination with other users and bodies – the achievement of the</i>	The Proposed Project has been designed and assessed having regard to the applicable EU

Policy	Relevant requirement	Proposed Project response
and Decision-Making Policy Objectives	<i>objectives of the regulatory framework for environmental protection and management, including compliance with EU Directives - including the Habitats Directive (92/43/EEC, as amended), the Water Framework Directive(2000/60/EC), the Birds Directive (2009/147/EC), the Environmental Impact Assessment Directive (2011/92/EU, as amended by 2014/52/EC) and the Strategic Environmental Assessment Directive (2001/42/EC) – and relevant transposing Regulations.</i>	environmental protection framework. The EIAR, NIS and Water Framework Directive assessment address the requirements of the EIA, Habitats, Birds and Water Framework Directives, with appropriate avoidance and mitigation measures incorporated to ensure the protection of biodiversity, European Sites and the water environment.
WCCDP ENV 02 - Regulatory Framework and Decision-Making Policy Objectives	<i>Lower levels of decision making, and environmental assessment shall consider the sensitivities identified in the SEA Environmental Report that accompanies the Plan, including the following:</i> <i>• Special Areas of Conservation and Special Protection Areas.</i> <i>• Features of the landscape that provide linkages/connectivity to designated sites (e.g. watercourses, areas of semi-natural habitat such as linear woodlands etc).</i> <i>• Natural Heritage Areas and proposed Natural Heritage Areas.</i> <i>• Areas likely to contain a habitat listed in Annex 1 of the Habitats Directive.</i> <i>• Entries to the Record of Monuments.</i> <i>• Entries to the Record of Protected Structures.</i> <i>• Architectural Conservation Areas; and,</i> <i>• Landscape/amenity designations.</i>	The Proposed Project has been designed in compliance with WCCDP ENV 02, having regard to the environmental sensitivities identified in the Development Plan and associated SEA Environmental Report. The EIAR and NIS assess potential effects on European Sites, designated habitats, ecological connectivity, cultural heritage, protected structures and landscape and visual amenity, with appropriate avoidance and mitigation measures incorporated into the design of the Proposed Project.

Policy	Relevant requirement	Proposed Project response
WCCDP ENV 04 - Environmental Quality Policy Objectives	Air and Energy <i>We will contribute towards compliance with air quality legislation; greenhouse gas emission targets; management of noise levels; and reductions in energy usage.</i>	The Proposed Project supports compliance with air quality legislation through the generation of renewable electricity, supporting reductions in greenhouse gas emissions and the transition to a low-carbon energy system. An Air Quality Assessment has been undertaken as part of the EIAR, alongside assessment of noise and climate effects, with appropriate mitigation measures incorporated to minimise potential effects during construction and operation.
WCCDP ENV 06 - Environmental Quality Policy Objectives	Human Health <i>Assess proposals for development in terms of; inter alia, potential impact on existing adjacent developments, existing land uses and/or the surrounding landscape. Where proposed developments would be likely to have a significant adverse effect on the amenities of the area through pollution by noise, fumes, odours, dust, grit or vibration, or cause pollution of air, water and/or soil, mitigation measures shall be introduced in order to eliminate adverse environmental impacts or reduce them to an acceptable operating level.</i>	The Proposed Project has been assessed having regard to the protection of human health and residential amenity. A dedicated Population and Human Health assessment has been undertaken as part of the EIAR, supported by assessments of noise, air quality, water, soils and other relevant environmental factors. Appropriate mitigation measures have been incorporated to avoid or minimise potential effects during construction and operation.
WCCDP Volume 2 Section 5.24 – Renewable Energy Developments	<i>All applications for wind energy developments should be compatible with the 2006 Wind Energy Development Guidelines issued by the DoEHLG (or any updated revision of same), the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017), and the Waterford Renewable Energy</i>	The application assesses the Proposed Project against the Guidelines (DoEHLG, 2006) and has regard to Draft Guidelines (DoHPLG, 2019). It addresses noise, shadow flicker,

Policy	Relevant requirement	Proposed Project response
	<i>Strategy (Appendix 7 of the Development Plan and in particular the wind energy designation map contained within the Strategy (Appendix 2 refers)) and the renewable energy targets set out in Table 6.3 of the Development Plan, while regard should also be had to the Waterford Landscape and Seascape Character Assessment (Appendix 8 of the Development Plan).</i>	landscape, ecology, heritage, aviation, grid infrastructure and community engagement.
WCCDP Waterford Renewable Energy Strategy 2016-2030 and Appendix 7	Identifies Exclusion Areas, Open for Consideration Areas and Preferred Areas for large-scale commercial wind-energy development. The designation is one part of the site-specific planning assessment. <i>The strategic aims of the Renewable Energy Strategy are;</i> <i>To ensure that between now and 2030, there is a steady, progressive and measurable increase in the amount of renewable energy used in the electricity, heat and transport sectors in Waterford, commensurate with the achievement of the national target.</i> <i>To identify opportunities for various renewable energy technologies and resources applicable to Waterford.</i> <i>To maximise the opportunities for renewable energy development whilst safeguarding the environment and other amenities, subject to Strategic Environmental Assessment and Habitats Directive Assessment requirements.</i>	The Proposed Wind Farm site is identified as a Preferred Area, as shown on Figure 1. This provides positive locational support for the Proposed Wind Farm, subject to the detailed environmental, landscape, amenity and development-management criteria.
WCCDP AH 01 - Archaeological Heritage	National Monuments Act <i>It is the policy of the Council to protect, and enhance in an appropriate manner all elements of the archaeological heritage including the following categories:</i> <i>a) Sites and monuments included in the Sites and Monuments Record as maintained by the Department with responsibility for the protection of Ireland's archaeological</i>	The cultural-heritage assessment undertaken as part of the EIAR considers direct, indirect, setting and cumulative effects and identifies the avoidance, investigation, monitoring and preservation measures to be implemented in relation to the Proposed Project.

Policy	Relevant requirement	Proposed Project response
	<i>heritage. b) Monuments and places included in the Record of Monuments and Places (RMP) as established under the National Monuments Acts.</i> <i>c) Historic monuments and archaeological areas included in the Register of Historic Monuments as established under the National Monuments Acts.</i> <i>d) National Monuments subject to Preservation Orders under the National Monuments Acts and National Monuments which are in the ownership or guardianship of the Minister with responsibility for archaeological heritage or the Local Authority.</i> <i>e) Archaeological objects within the meaning of the National Monuments Acts.</i> <i>f) Wrecks protected under the National Monuments Acts or otherwise included in the Shipwreck Inventory maintained by the National Monuments Service, underwater archaeology, riverine, coastal or lacustrine locations.</i> <i>g) Archaeological features not as yet identified but which may be impacted on by development.</i> <i>And where feasible, appropriate and applicable to promote access (including disabled access) to and signposting and interpretive material of such sites and monuments and provide appropriate forms of virtual access where physical access is not possible.</i>	
WCCDP AH 02 - Archaeological Heritage	Managing Development <i>We will contribute, as appropriate, towards the protection and sympathetic enhancement of archaeological heritage, in particular by implementing the relevant provisions of the Planning and Development Act 2000 (as amended) and the National</i>	The Proposed Project aligns with this policy through the preparation of a Cultural Heritage assessment as part of the EIAR, including consideration of recorded monuments and

Policy	Relevant requirement	Proposed Project response
	<i>Monuments Act, 1930 (as amended). We will ensure that archaeological excavation is carried out according to best practice as outlined by the National Monuments Service, Department of Housing, Local Government and Heritage, the National Museum of Ireland and the Institute of Archaeologists of Ireland. We will consult with the National Monuments Service as relevant in relation to proposed developments, including those adjoining archaeological sites.</i>	potential previously unrecorded archaeological features. Appropriate avoidance, mitigation and archaeological monitoring measures have been incorporated, where required, in accordance with relevant legislation and best practice guidance.
WCCDP AH 03 - Archaeological Heritage	Preservation of Archaeological Material <i>Waterford City & County Council shall, in an appropriate manner, secure either by preservation insitu or preservation-by-record, the archaeological heritage. In this regard priority shall be given to the preservation in-situ of any archaeological monument/site/place as the first option considered. If preservation in-situ cannot be achieved, or can only be achieved in-part, then preservation by-record of elements of the archaeological heritage will be required –this will require the full archaeological excavation and recording of the monument/site, according to best professional practice. Where excavation is required this shall also include the preparation of appropriate reports, post-excavation analyses and publications. The costs of assessing and mitigating archaeological impacts shall form part of development costs as borne by the developer.</i>	The Cultural Heritage assessment within the EIAR prioritises preservation in situ, with appropriate mitigation, including preservation by record and archaeological monitoring, where required.
WCCDP AH 04 - Archaeological Heritage	Archaeological Impact Considerations <i>It is the policy of the Council to:</i> <i>Ensure that development in the vicinity of a site of archaeological interest shall be designed and sited sympathetically and shall not be detrimental to</i>	The cultural-heritage assessment considers direct, indirect, setting and cumulative effects and identifies the avoidance, investigation, monitoring and preservation measures to be implemented in relation to the Proposed Project.

Policy	Relevant requirement	Proposed Project response
	<i>the character of the archaeological site or its setting by reason of its location, scale, bulk or detailing.</i> • <i>When considering development in the vicinity of all archaeological sites including remnants of the city and town walls, the planning authority will require the preparation of an archaeological assessment detailing the potential impact of any development on upstanding structures, buried structures and deposits. The report will also include a visual impact assessment to ensure adequate consideration of any potential visual impact the proposed development may have on any upstanding remains.</i> • <i>Proposed developments will be required to retain the existing street layout, including laneways, historic building lines and traditional plot widths where these derive from medieval or earlier origins.</i> • <i>When considering development in the vicinity of upstanding archaeological/historical monuments, to aim to achieve a satisfactory buffer area between the development and the monument in order to ensure the preservation and enhancement of the amenity associated with the presence of upstanding monuments within the historic urban pattern.</i> • <i>For all developments, which have potential to impact on riverine, intertidal and sub-tidal environments to require an archaeological assessment prior to works being carried out. In addition to planning permission, development works at National Monuments of which the Minister or local authority is owner of, guardian of or in respect of which a preservation order is in force, may also require Ministerial Consent under Section 14 of the National Monuments Act 1930 (as amended) and this will be determined by the relevant authority (Department of Housing, Local Government & Heritage) on application.</i>	
WCC Climate Action Plan 2024-2029	4.4.2 To reduce Waterford City and County Council's greenhouse gas emissions by reducing reliance on fossil fuels through increased energy efficiency, a move to active	The Proposed Project is consistent with these objectives through the generation of renewable electricity, reducing reliance on fossil fuels and

Policy	Relevant requirement	Proposed Project response
	<i>and public transport, deployment of renewable energy technologies and influencing behavioral change internally and externally.</i> 5.2 <i>Waterford City will be Ireland's first low-carbon city, providing both residents and businesses with sustainable, innovative solutions when it comes to energy efficiency, renewable energy, transport and the effective use of resources to eliminate waste.</i>	supporting the transition to a low-carbon economy. The Proposed Project will contribute to increased renewable energy generation and associated reductions in greenhouse gas emissions.

7.1.2 Waterford City & County Council Climate Action Plan 2024-2029

The Waterford City & County Council Climate Action Plan 2024-2029 (Waterford CAP) sets out to enable solutions at a local level to address climate change. The Waterford CAP will enable a transition to a low-emission and climate resilient society. The Climate Action Plan identifies strategic objectives, supported by specific actions.

4.4.2 Strategic Goal 2: Built Environment and Transport Objective: To reduce Waterford City and County Council's greenhouse gas emissions by reducing reliance on fossil fuels through increased energy efficiency, a move to active and public transport, deployment of renewable energy technologies and influencing behavioural change internally and externally

The strategic goal outlined above would be significantly aided by the Proposed Project and its potential to connect 145.2MW of renewable electricity to the grid, and as such, the Proposed Project is aligned with the Waterford CAP.

7.1.3 Waterford Renewable Energy Strategy 2016-2030

The Waterford Renewable Energy Strategy 2016-2030 (Waterford RES) examines the renewable energy potential for the city and county and considers the strategic planning factors contributing towards the deployment of such renewable energy. It also highlights the importance of integrating renewable energy and land use planning. To this end, the Waterford RES recognises that there is a need to strengthen links between renewable energy and land use planning through County Development Plans, Strategic Development Zones and other local plans.

The Waterford RES characterises the county into 3 different policy areas aimed at facilitating large scale commercial wind energy developments. These policy areas are based on a number of criteria, including accessibility to the electricity distribution grid, used to identify suitable areas for wind energy developments. The areas and descriptions are set out below.

- > Preferred Areas,
- > Open for Consideration Areas,
- > Exclusion Areas,

While not defined in the WCCDP 2022-2028, 'Preferred Areas' were previously defined in the Waterford County Development Plan 2011- 2017 as:

"Areas which are suitable and should generally be considered for permission unless local circumstances dictate otherwise"

The Proposed Wind Farm is located within a designated 'Preferred Area' for wind energy development, indicating that the site is considered suitable in principle for such development, subject to detailed site-specific assessment and compliance with all relevant planning and environmental requirements. Having regard to the applicable policies and objectives of the WCCDP, the Proposed Wind Farm is considered to accord with the relevant provisions of WCCDP and to represent appropriate and sustainable development within the area of WCCC.

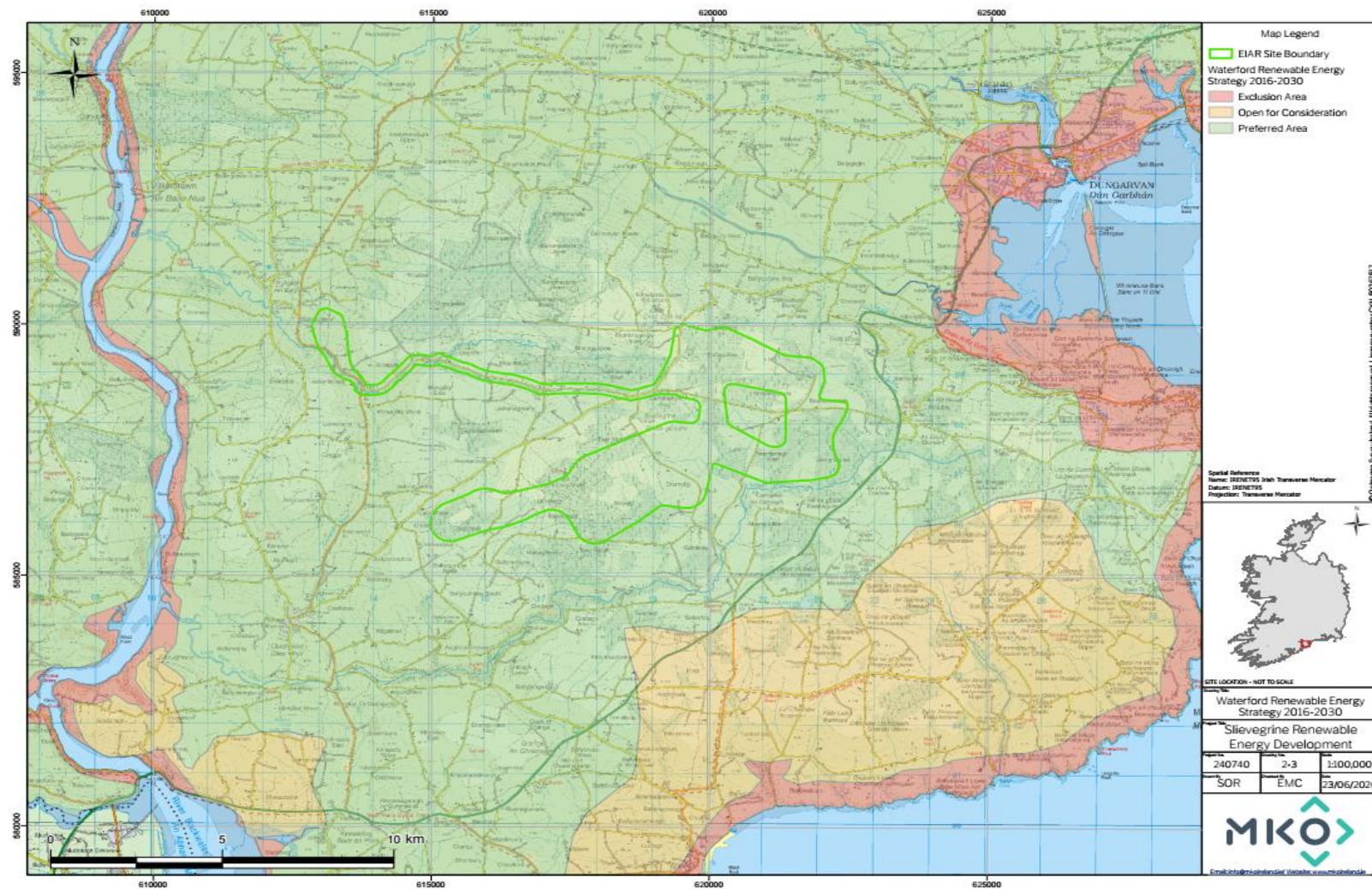


Figure 2: Waterford Renewable Energy Strategy 2016-2030

Summary of Compliance with Planning Policy

The provision of renewable energy developments such as the Proposed Project is strongly supported by European, national, regional and local policies and guidelines aimed at achieving the transition to a carbon neutral and climate resilient economy, increasing renewable energy generation and enhancing energy security. Specifically, the Proposed Project will contribute to achieving the target of generating 9GW of electricity from onshore wind and reducing GHG emissions by 80% by 2030 as set out in the CAP 25.

At a European level, the Proposed Project will support Ireland in reaching its legally binding obligations as an EU Member State of achieving at least 42.5% renewable energy by 2030, as set out in RED III. Furthermore, REDIII and RePowerEU have emphasised the European recognition for transitioning away from fossil fuels and increasing the penetration of renewable energy sources into the electricity market. These will play a crucial role in raising awareness and encouraging countries to prioritise the development and adoption of renewable energy technologies.

The Proposed Project aligns with National Strategic Outcomes and Objectives outlined in the NPF and the Revised NPF, particularly Objective 70, which seeks to promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050.

Regionally, the Proposed Project will support the future growth of renewable energy technology in the SRA region as called for in the RSES which sets a clear precedent to identify and capitalise on those opportunities associated with the transition to renewable energy generation.

Locally, the WCCDP and associated Waterford CAP fully recognise the importance of tackling climate change through the increased supply of renewable energy. WCCC seeks to support and facilitate the sustainable provision of a reliable energy supply in the county, with emphasis on increasing energy supplies derived from renewable resources. Furthermore, there are a range of policies in place which support the development of renewable energy.

The Proposed Wind Farm is located in a 'Preferred Area', demonstrating the site's appropriateness for wind energy development, subject to detailed assessment. Accordingly, the Proposed Wind Farm is considered to be compliant with the relevant provisions of the WCCDP and represents proper planning and sustainable development in the functional area of Co. Waterford.

If the Proposed Project were not to proceed, the opportunity to capture this additional part of County Waterford's valuable renewable energy resource would be lost, as would the prospect of contributing to European and national targets for the production and consumption of electricity from renewable resources and the reduction of greenhouse gas emissions. The opportunity to generate local employment and investment associated with the Proposed Project would also be lost.

8.

PLANNING ASSESSMENT

The Proposed Project has been subject to a rigorous design process informed by a comprehensive planning and environmental assessments and surveys, which have collectively concluded that the Proposed Wind Farm is in line with proper planning and sustainable development of the area. The Proposed Project has been designed having regard to the requirements of the Guidelines (DoEHLG, 2006), including the relevant separation distances from sensitive receptors. The layout also provides for a setback of at least four times tip height from third-party sensitive receptors, consistent with the setback proposed in the Draft Guidelines (DoHPLG, 2019), subject to the applicable minimum setback distance.

Specifically, there are no significant environmental impacts associated with the Proposed Project during the construction, operational or decommissioning phases of the development nor will it have any significant effects on any European Sites. Any potential environmental impacts can be addressed through standard mitigation measures and residual impacts will not be significant.

Accordingly, the following section provides a planning assessment of the Proposed Project under a number of key material considerations. This includes an assessment of the principle of development, followed by an assessment of the key environmental topics covered in the EIAR, which together inform the overall planning assessment of the Proposed Project. These considerations include the following headings:

- Population and Human Health (Including Shadow Flicker),
- Biodiversity,
- Ornithology,
- Land, Soils and Geology,
- Hydrology and Hydrogeology,
- Air Quality,
- Climate,
- Landscape and Visual Impact Assessment,
- Archaeology and Cultural Heritage,
- Material Assets.

8.1

Principle of Development

The principle of development is considered to be acceptable at this location, having regard not only to its alignment with all levels of Planning Policy, including International, National, Regional and Local Planning Policy Frameworks, but also in the context of binding climate change obligations, the Proposed Project Design Process and relevant environmental requirements.

Policy Context

At an International and National Level, the Proposed Project will make a meaningful contribution towards achieving the transition to a low-carbon economy and climate resiliency, increasing renewable energy generation, and enhancing energy security. It will contribute directly towards the CAP 25 goals of 9GW of wind energy by 2030 and renewable electricity share of 80% by 2030.

At a Regional Level, the Proposed Project will strengthen the role of the Southern Region as a leader in the renewable energy generation and in doing so, will support the transition to a climate resilient society.

Locally, it is evident that there is strong support at local level for the development of renewable energy projects in County Waterford in accordance with the WCCDP.

Obligations of Consenting Authorities under the Climate Act

The decision of the Supreme Court in *Coolglass Wind Farm Limited v An Coimisiún Pleanála* [2026] IESC 5 confirms that Section 15 of the Climate Act imposes a binding obligation on consenting authorities, including ACP, to determine planning applications, insofar as practicable, in a manner that is consistent with the fulfilment of national climate objectives and to give adequate reasons demonstrating that consistency.

The Proposed Project is supported by local, regional and national policy and has been designed in accordance with the latest national guidance and best practice. It has also been demonstrated, in the EIAR and NIS, that the Proposed Project will not give rise to any significant adverse effect on the environment or on the integrity of European Sites.

Crucially, the Proposed Project will have a total estimated installed generating capacity of 145.2 MW and will result in the net displacement of approximately 79,376 tonnes of carbon dioxide (CO₂) per annum, including accounting for back-up generation, making a significant contribution towards the CAP 25 goals of 9GW of wind energy by 2030 and renewable electricity share of 80% by 2030.

Accordingly, ACP can lawfully exercise its planning judgement to grant permission for the Proposed Project in a manner consistent with its statutory duty under Section 15 of the Climate Act and the principles clarified in the *Coolglass Judgement*, whilst also aligning with EU, national and local policy objectives.

Detailed Constraints Exercise

A detailed analysis of site-specific constraints was carried out in order to inform the placement of the proposed infrastructure.

The ecological assessment of the Proposed Wind Farm site encompassed habitat mapping and extensive surveying of birds and other fauna. This assessment, as described in **Chapters 6 and 7** of the EIAR relating to Biodiversity and Ornithology, optimised the decision on the siting of proposed turbines and the carrying out of any development works, such as the construction of roads.

The hydrological and geotechnical investigations of the Proposed Wind Farm site examined the proposed locations for turbines, roads and other components of the Proposed Project, such as the construction compound. Where specific areas were deemed unsuitable for the siting of turbines or roads, etc., alternative locations were proposed and assessed, taking into account the areas already ruled out by constraints.

The turbine layout for the Proposed Wind Farm has also been informed by the results of noise, landscape and visual considerations and the separation distance to be maintained between turbines. Thus, the baseline environmental assessment of the site and wind farm design was an iterative process, where findings at each stage of the assessment were used to further refine the design, always with the intention of minimising the potential for environmental impacts.

The development of the final Proposed Wind Farm layout has resulted following feedback from the various studies, investigations and assessments carried out as well as ongoing negotiations and discussions with landowners and the local community. This final design is regarded as optimal as identified constraints are avoided while also maximising the site's development potential.

Appropriate Assessment

To support ACP in carrying out their Appropriate Assessment, an Appropriate Assessment Screening Report and NIS have been prepared for the Proposed Project. This report has been prepared to provide the competent authorities with the information necessary to complete an Appropriate Assessment screening and an Appropriate Assessment for the Proposed Project in compliance with Article 6(3) of the Habitats Directive.

The NIS concludes that the Proposed Project, individually or in-combination with other plans or projects, will not adversely affect the integrity of any European Site.

It is therefore judged that, provided the Proposed Project is constructed and operated in accordance with the design, best practice and mitigation that is described within this application, significant residual impacts on biodiversity, flora and fauna will not occur. The biodiversity enhancement measures outlined for the Proposed Project will result in an improvement of the existing ecological conditions of the Site.

8.1.2 Conclusion

In summary, the Proposed Project is a type of development which is specifically required to aid the State to meet our binding climate targets and obligations at a National and International level. It is demonstrably supported at all levels of planning policy and is located within an area identified at a local level as the most appropriate location within the County for the development of renewable energy.

The Proposed Project provides the opportunity to realise the valuable renewable energy resource. If the Proposed Project were not to proceed the opportunity to capture this additional part of Co. Waterford's valuable renewable energy resource would be lost, as would the opportunity to contribute to meeting Government and EU targets for the production and consumption of electricity from renewable resources and the reduction of greenhouse gas emissions.

In this regard, and subject to compliance with all relevant environmental and ecological considerations as set out in the EIAR and NIS, the principle of development of the Proposed Project is considered to be wholly acceptable and appropriate at this location.

8.2 Key Environmental Considerations

Table 4 provides a summary of the of the Proposed Project under key material environmental considerations and identifies the relevant chapters of the EIAR where they are specifically addressed

Table 4: Planning Assessment Summary

Consideration	Summary	Relevant EIAR Chapter
Population and Human (Including Shadow Flicker)Health	• Noise Impact: The EIAR confirms that operational noise from the Proposed Project will comply with the noise limit criteria at all Noise Sensitive Locations as per the Guidelines (DoEHLG, 2006) • Shadow Flicker: The EIAR confirms shadow flicker levels will meet the Guideline limits at all Sensitive Receptors and can be adjusted to align with the future guidance if they are adopted during the planning process. • Visual Amenity: The LVIA finds no significant effects on sensitive receptors, with overall visibility of the Proposed Project considered not significant.	Chapter 5 – Human Beings Chapter 12 – Noise Chapter 13 – Landscape
Biodiversity	No significant residual effects as a result of the Proposed Project in relation to disturbance, displacement, mortality of faunal species, loss of faunal habitat or deterioration in water quality has been identified. The potential for effects on the European Sites is fully described in the NIS that accompanies this application. The NIS concludes that in view of best scientific knowledge and on the basis of objective information, the Proposed Project either individually or in combination with other plans or projects, is not likely to have adverse effects on the European Sites that were assessed as part Appropriate Assessment process. Similarly, with the prescribed mitigations in place, there is no potential for impact on any nationally designated site. A Biodiversity Management and Enhancement Plan has been prepared (Appendix 6-4) which will enhance the Site for biodiversity at a local scale. The objectives of the BMEP include: ➤ To provide biodiversity enhancement within the Site by establishing an area of native woodland of 3.6ha and planting of 5.5km of new hedgerow (inclusive of 1.2km of riparian planting) within the Site in order to increase linear habitat and bolster wildlife corridors, ➤ To protect the water quality of the River Licky from surface water run-off through targeted riparian planting and prevention of poaching of livestock along tributaries within the Site, ➤ To provide additional foraging areas and nesting opportunities for pollinators, ➤ The provision of nest boxes/artificial breeding sites for pine marten and red squirrel,	Chapter 6 – Biodiversity

	➤ To provide a management and monitoring plan to ensure the success of the proposed biodiversity enhancement measures.	
Ornithology	Following consideration of the residual effects (post-mitigation), it is concluded that the Proposed Project will not result in any significant effects on any of the identified Key Ornithological Receptor (KOR). No significant effects on receptors of International, National or County Importance were identified. Provided that the Proposed Project is constructed, operated and decommissioned in accordance with the design and best practice mitigation measures that are described within this application, significant individual or cumulative effects on the identified KORs are not anticipated	Ch.7 – Ornithology
Land, Soils, & Geology	No significant impacts on the land, soil, and geology of the Site will occur during construction, operation, or during decommissioning phases. The assessment also concludes that there will be no cumulative effects on land, soil and geology environment as a result of the Proposed Project.	Ch.8 – Geology & Soils
Hydrology & Hydrogeology	No significant effects to surface water (quality and flows) and groundwater (quality and quantity, and any local groundwater wells) will occur as a result of the Proposed Project provided the proposed mitigation measures are implemented. An assessment of potential cumulative effects associated with the Proposed Project and other developments on the hydrological and hydrogeological environment has been completed. With the implementation of the mitigation measures detailed in the EIAR, the cumulative assessment found that there will be no significant effects on the hydrological and hydrogeological environments. No significant effects on the water environment will occur during the construction, operation or decommissioning of the Proposed Project.	Ch.9- Hydrology & Hydrogeology
Air Quality	It is considered there will be no measurable negative cumulative effects on air quality should other proposed or consented plans and within the surrounding landscape be operational in parallel with the Proposed Project. However, once the Proposed Project is operational, there will be a long-term, significant, positive impact on the air quality.	Ch.10 – Air Quality
Climate	Residual effects of greenhouse gas emissions arising from the construction phase of the Proposed Project will have a short-term imperceptible negative effect and is not significant. However, once	Ch.11 - Climate

	emitted to the atmosphere, the greenhouse gas emissions that will arise from construction phase activities will have a permanent imperceptible negative effect on Climate. The Proposed Project will displace 2,778,160 tonnes carbon dioxide from fossil fuel-based electricity generation, over the proposed 35-year lifespan. Therefore, while there will be greenhouse gas emissions associated with the construction of the Proposed Project, this will have a long-term significant positive impact on climate. Following implementation of the mitigation measures, residual effects of greenhouse gas emissions arising from the operational phase of the Proposed Project will have potential long-term imperceptible negative not significant effect on Climate.	
Landscape & Visual Impact Assessment	In conclusion, this LVIA determined that the Proposed Wind Farm is located within a landscape that can effectively accommodate a wind energy development of this scale, given the large scale and expansive nature of the receiving environment and the mitigation measures in place to ensure no significant impact on key landscape and scenic sensitivities. The assessments have determined that the Proposed Project site is a landscape capable of effectively accommodating the Proposed Project.	Ch.13 Landscape
Archaeology & Cultural Heritage	Following the application of mitigation measures there will be no significant residual effects on the existing and previously unrecorded archaeological, architectural or cultural heritage resource as a result of the construction of the Proposed Project. Any remains that are encountered during the course of monitoring or test trenching will be subject to preservation by record or preservation in-situ.	Ch.14 Cultural Heritage
Material Assets	The Proposed Project will have no significant impacts on traffic and transport including road safety, the aviation resource, telecommunications, existing built services and waste management. A Road Safety Audit, Telecommunications Impact Assessment and Aviation Review Statement have been provided as part of the EIAR (Appendix 15-4, 15-6 & 15-7 respectively). No significant cumulative impacts on material assets will arise as a result of the Proposed Project during the construction phase and permitted or proposed projects and plans in the area. There are no cumulative effects associated with the construction, operational and decommissioning phases of the Proposed Project.	Ch. 15 Material Assets

CONCLUSION

The provision of wind energy developments such as the Proposed Project is strongly supported by European, National, Regional and Local policy and guidelines aimed at achieving the transition to a low carbon and climate resilient economy, increasing renewable energy generation, and enhancing energy security. Specifically, the Proposed Project will contribute to achieving the target of generating 9GW of electricity from onshore wind and reducing GHG emissions by 51% by 2030 as set out in the CAP 25. The Proposed Project aligns with National Strategic Outcomes and Objectives outlined in the National Planning Framework First Revision, particularly Objective 55, which seeks to promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050.

The assessment of the Proposed Wind Farm site against the Waterford RES demonstrates that the site is suitable for wind energy development. The entire area of the Proposed Wind Farm site is identified as a 'Preferred Area' for wind energy development under the Waterford RES. The Proposed Project has been designed to avoid and minimise potential impacts on environmental receptors, with appropriate mitigation measures proposed where potential impacts have been identified.

CAP 24 estimates that an 8-times increase in renewable energy deployment to 2.3 GW annually is required between 2024 and 2030 to reach climate and energy targets. CAP 25 reaffirms the ambitious targets for renewable electricity share of 80% by 2030, which is to be achieved, in part, by the deployment of a targeted 9GW of onshore wind by 2030. To achieve this, greater alignment between local plans and national and regional renewable energy targets is urgently required. If permitted, the Proposed Project is estimated to contribute 145.2MW of installed capacity to the national electricity grid. This will not only contribute to the decarbonisation of the electricity sector but will play a role in the decarbonisation of other sectors and the transition to a low carbon, climate resilient economy.

To combat the effects of climate change, Ireland must decarbonise its economy by 2050. There is no "silver bullet" to do so. It will take several individual renewable energy projects to decarbonise the Irish economy. The scale of the challenge we face to decarbonise the Irish economy is enormous, but the climate change implications of not doing so are even greater. There is no other way to decarbonise a modern society except through renewable energy projects such as the Proposed Project.

Having regard to the key points set out in this Planning Report, it is respectfully requested that ACP consider the relevant planning context that applies, and grants permission for the Proposed Project which is the subject of this application.

