

Policy and Planning Context

Shronowen Wind Farm



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Table of contents

1	INTRODUCTION	1
1.1	The Applicant.....	1
1.2	The Project including the Proposed development	1
2	PLANNING CONTEXT AND NEED FOR THE DEVELOPMENT	3
2.1	From Kyoto to Paris	3
2.2	EU and National Policy and Guidance	3
2.3	Regional Planning Policy	7
2.4	Local Planning Policy.....	9
2.4.1	Kerry Renewable Energy Strategy 2012.....	9
2.5	EIAR assessment methodology.....	11
2.5.1	Legislative Context	11
3	NOTE ON CLIMATE CHANGE	12
4	CONSULTATION WITH THE LOCAL COMMUNITY	13
5	CONCLUSION	13

1 INTRODUCTION

This report has been prepared by Malachy Walsh and Partners, on behalf of Shronowen Wind Farm Ltd., to accompany a planning application to An Bord Pleanála for the Shronowen Wind Farm.

Planning permission is being sought through the Strategic Infrastructure Development consent process. Two pre-application meetings were held with An Bord Pleanála in 2020, with representatives from Shronowen Wind Farm and Malachy Walsh and Partners in attendance. The Board confirmed the project would be Strategic Infrastructure, in correspondence dated the 25th of September 2020, and advised on the list of prescribed bodies.

An Environmental Impact Assessment Report (EIAR) has been compiled for the project and accompanies the planning application submission. The EIAR considers the environmental impacts and proposes appropriate mitigation measures where necessary.

A Stage 1 Screening for Appropriate Assessment has also been completed which identified the need for a Stage 2 Natura Impact Statement due to possible impacts on two Natura 2000 designated sites.

This report provides a concise overview of the policy and planning context of the proposed development application. It underscores how the proposed development accords with relevant national, regional and local planning policies. The report should be read in conjunction with the supporting studies in the Environmental Impact Assessment Report and the Natura Impact Statement, submitted with the planning application, which have been carried out to provide the requisite information to An Bord Pleanála to enable a thorough assessment of the project.

Shronowen Wind Farm Ltd. (the Applicant) is seeking planning consent from An Bord Pleanála (ABP) for a proposed wind energy development in the townlands of Tullamore, Coolkeragh, Ballyline West and Dromalivaun, Co. Kerry on a site approximately 4 kilometres south of Ballylongford and 6km north of Listowel (ITM Co-ordinates 561970, 677375).

Malachy Walsh and Partners (MWP) have been engaged by the Applicant to prepare the Environmental Impact Assessment Report (EIAR) and the Natura Impact Statement (NIS) to accompany the planning application.

1.1 THE APPLICANT

The applicant is Shronowen Wind Farm Ltd., a wholly owned subsidiary of EMP Energy Limited (trading as EMPower). EMPower is an international renewable energy company with locations in Ireland, Tanzania, Ghana and Iceland. The company was established in 2015 with the goal of contributing toward the global transition from traditional, carbon-heavy energy sources to clean, renewable, indigenous power generation with focus in Ireland on the 2030 renewable energy targets. EMPower's primary objective is the development of greenfield wind assets, with a current portfolio of 800MW in development. EMPower presently employs nine (9) staff, with offices in Ireland, Iceland, Ghana and Tanzania. EMPower is currently developing a portfolio of over 700MW of wind in these markets.

1.2 THE PROJECT INCLUDING THE PROPOSED DEVELOPMENT

The project, assessed in the Environmental Impact Assessment Report and Natura Impact Statement, includes both the proposed development, and an alternative grid connection.

Furthermore, replacement forestry lands, associated with the permanent felling to allow the construction of the wind farm, are also included as a project component.

The application is made under s.37E of the Planning and Development Act 2000, as amended, in accordance with the An Bord Pleanála Notice made under s.37B(4)(a) issued 25 September 2020, directing the application to be made directly to An Bord Pleanála under s.37E of the 2000 Act. (ABP-306727-20)

The proposed development for which permission is sought includes inter alia 12 wind turbines and 1 met mast, each with associated foundations and hardstand areas, a 110kV substation, including an outdoor electrical yard, and two single-storey buildings containing controls, switchgear and metering rooms and associated facilities, all within a fenced compound within the site, and a 225m underground cable grid connection from the substation to an existing 110kV transmission line which runs in a North-South direction on the eastern boundary of the proposed development site. The connection to the existing 110kV transmission line will be carried out entirely within the redline boundary of the planning application. The Applicant is seeking a 10-year permission to construct the development, which, when commissioned, would have an operational life of 30 years.

The proposed development for which planning permission is sought therefore consists of *‘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’* together with ancillary development, facilities and infrastructure. The output of a wind farm is measured (metered) at the substation and, as noted by the High Court in *O’Grianna*, *‘the connection to the national grid, is an integral part of the overall development’*.

The application under s.37E is accompanied by an EIAR and NIS for the whole project, including all elements within the redline boundary of the application for which planning permission is sought, and other project elements outside of the redline boundary for which planning permission is either not sought or is not required but which nonetheless is subject to holistic environmental assessment of the project as a whole,

It is considered that the s.37E application will ensure a holistic and integrated planning and environmental assessment, and will address concerns in relation to ‘project-splitting’ that arise frequently in legal challenges to projects involving more than one planning application, for example under s.34 and s.182A (e.g. *Fitzpatrick and Daly v ABP*) and under s.37E and section 182A or s.34 (e.g. *Alen-Buckley v ABP*).

It is accepted that separate applications can be made, subject to compliance with the Habitats, Birds and EIA Directives, but it is considered that a separate application is not necessary in circumstances where, as in this case, the preferred method of connection to the grid for which planning permission is sought forms an integral part of the Seventh Schedule development, incorporated within the redline boundary of the planning application.

2 PLANNING CONTEXT AND NEED FOR THE DEVELOPMENT

This Section considers how the proposed development accords with relevant national, regional, and local planning policies including any new and emerging policy and development objectives relating to climate change and renewable energy.

2.1 FROM KYOTO TO PARIS

The Paris Agreement evolved from the historic United Nations Framework Convention on Climate Change in Kyoto where participants agreed to limit total greenhouse gas emissions to a defined percentage below their 1990 levels. The first commitment period under the Kyoto Protocol was over the five-year period 2008–2012. Ireland's commitment was to limit increases in greenhouse-gas emissions to 13 per cent above the 1990 levels. Ireland complied with the first commitment period (helped in part by the recession).

The Doha Amendment sought to extend that period beyond 2012 and has now been succeeded by the Paris Agreement and Agenda 2030. Ireland did not meet commitments to 2020.

The Paris Agreement is focused on strengthening the global response to Climate Change with a target to limit the increase in global average temperature to well below 2°C and for nations to increase their ability to adapt to the adverse impacts of climate change and foster climate resilience. The agreement does not specify targets but requires all parties to put forward a plan including Nationally Determined Contributions (NDCs) to achieve the goal set out. The EU requires a reduction in greenhouse gas emissions of at least 40% by 2030, compared to 1990 levels. The EU expects member states to outline their NDCs in national climate action plans. Ireland published a Climate Action Plan in 2019.

2.2 EU AND NATIONAL POLICY AND GUIDANCE

In recognition of fossil fuels as a finite resource, Ireland's dependence on others to meet our energy requirement and the cost of importing this energy, national policy encourages the development of local renewable energy. A host of relevant legislation and policy exists at an International and European level, which supports the development of renewable energy.

Irish renewable energy policy is framed in the context of these European and other International policy initiatives. The following is a broad list of selected legislation, policies and guidance which are relevant to wind energy developments:

- Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (Renewable Energy Directive – Recast)
- New Green Deal 2019
- European Climate Law 2020
- White Paper - Ireland's Transition to a Low Carbon Energy Future 2015-2030
- Climate Action Plan 2019
- Draft Climate Action and Low Carbon (Amendment) Bill 2020
- Planning Guidelines for Wind Energy, DEHLG 2006
- Best Practice Guidelines for the Wind Energy Industry, IWEA 2012
- Code of Practice for Wind Energy Development in Ireland, DCCAE 2016

2.2.1.1 EU Renewable Energy Directive - Recast

In June 2009, the European Commission published EU Directive 2009/28/EC (the “Renewable Energy Directive”) on the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC on the promotion of electricity produced from renewable energy sources in the internal electricity market and 2003/30/EC on the promotion of the use of biofuels or other renewable fuels for transport. Directive 2001/77/EC provided the framework for the integration of renewable electricity sources into the electricity grid.

The 2009 Directive provided that a mandatory national target should be established consistent with a 20% share of energy from renewable sources in Community energy consumption by 2020. The 2018 Directive provides that member states shall *collectively* ensure that the share of energy from renewable sources in the EU’s gross final consumption of energy in 2030 is at least 32%. Each member state must therefore set nationally binding targets which collectively are capable of meeting this EU target. Each member state is required to establish their contribution to this target as part of the integrated national energy and climate plan required to be submitted pursuant to the EU Governance Regulation (EU) 2018/1999.

2.2.1.2 New Green Deal and the European Climate Law

The European Green Deal provides a roadmap and overall policy agenda, for all key economic sectors to deliver on the EU’s climate ambition. It proposes increasing the EU’s emissions reduction targets for 2030 from 40% to at least 50% and towards 55% compared with 1990 levels, while proposing a 2050 climate neutrality objective. The increased commitment to 2030 will be challenging for Ireland and likely require comprehensive implementation of the policies and measures included in the Climate Action Plan (Section 2.2.1.4).

The European Commission proposed the first European ‘Climate Law’ in March 2020 which will enshrine the 2050 climate neutrality objective in legislation. In Ireland, the draft text for the proposed Climate Action and Low Carbon (Amendment) Bill 2020 was published in October 2020 and gives legislative underpinning to Ireland’s 2050 zero net emissions target and the core objectives of the Climate Action Plan (section 2.2.1.5). The exact nature of this target is still to be determined, though the Irish Climate Change Advisory Council (CCAC) has advised that emissions of all GHGs (except biogenic methane) should reach net zero by 2050.

2.2.1.3 White Paper on Energy - Ireland's Transition to a Low Carbon Energy Future 2015-2030

The Government’s White Paper on Energy ‘Ireland’s Transition to a Low Carbon Energy Future 2015-2030’, published by the Department of Communications, Climate Action and Environment in 2015, sets out a framework to guide energy policy and the actions that Government intends to take in the energy sector from 2015 up to 2030. The White Paper, and achievements since its introduction, underpins government policy to continue to support development of both onshore and offshore wind energy development in accordance with published planning guidelines and local development plan policy.

It states that the 2020 target of 40% RES-E (Renewable – Electricity) is likely to require a total of 3,500-4,000 MW of onshore renewables generation capacity, compared to the 2,500 MW available at end December 2014, of which wind generation accounted for 2,200MW.

Wind generation continues to provide the bulk of Ireland's renewable energy in 2020. According to recent information provided by IWEA (November 2020) there is currently 4,235MW of installed wind capacity connected to the National Grid in the Republic of Ireland.

2.2.1.4 Climate Action Plan 2019

The Irish Government published its Climate Action Plan in June 2019. The Plan contains wide targets and policy objectives for the period 2021 to 2030. Wind energy is at the heart of the Plan with a target of 3.5GW of offshore wind energy by 2030, to increase onshore wind capacity to 8.2GW (currently around 4.2GW) and all to achieve the overall target proposed by IWEA in 2018 of providing 70% of our electricity from renewable sources by 2030.

According to the Plan, Ireland will miss the target set for the period 2013 to 2020 for renewables by about one eighth and for cumulative emissions by a little under 5%. A key target of the Plan is to "Increase reliance on renewables from 30% to 70% adding 12GW of renewable energy capacity (with peat and coal plants closing) with some of this delivered by private contracts". The Plan further seeks to "Open up opportunity for community participation in renewable generation as well as community gain arrangements". The proposed wind farm will contribute to achieving these targets.

As part of the Climate Action Plan, a new charter was introduced in October 2019 which will set the direction for local authorities in a bid to tackle climate change. A range of new measures will be adopted requiring all 32 counties to proactively consider the carbon impact of decisions they make. Each council must establish a procedure for "carbon-proofing" major decisions, programmes and projects, including investments in transport and energy infrastructure. The proposed wind farm would contribute to meeting the aims of the charter.

The proposed Shronowen Wind Farm is fully compatible with the provisions relating to renewable energy set out in the Climate Action Plan (CAP), summarised as follows:

- The project will contribute directly to the CAP commitment that 70% of national electricity will come from renewable sources by 2030, up from 30%.
- The project will contribute directly towards meeting Ireland's renewable energy production targets by 2030 and 2040.
- The project will contribute directly to the specific objectives for onshore wind capacity in Ireland by 2025 and 2030.
- The project will contribute directly to the objectives of the CAP through the provision of grid connection infrastructure to support the renewable energy output.
- The technology to be used is recognised as a least cost technology by the CAP.

2.2.1.5 Draft Climate Action and Low Carbon (Amendment) Bill 2020

The draft text for the proposed Climate Action and Low Carbon (Amendment) Bill 2020 was published in October 2020. This Bill will amend the Climate Action and Low Carbon Development Act 2015 to give legislative underpinning to Ireland's 2050 zero net emissions target and the core objectives of the Climate Action Plan.

The key features of the Bill are:

- putting into law the Irish Governments commitment for net-zero greenhouse gas emissions by 2050.
- requires Government to propose carbon budgets, with the first three to be prepared every 5 years from 2021, including a provision for setting sectoral targets;
- prepare an annually-revised Climate Action Plan;
- provide for a strengthened role for the Climate Change Advisory Council.

2.2.1.6 Planning Guidelines for Wind Energy (DoEHLG 2006)

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

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

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

Issues addressed include:

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

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

In December 2019, the Department of Housing, Planning and Local Government published proposed revised guidelines for wind energy developments addressing a number of key aspects including noise, visual amenity setback, shadow flicker, community consultation obligations, community dividend and grid connections. The publication of the Draft Guidelines at the end of 2019 followed a lengthy review process including the issue of draft revisions in December 2013 and a Preferred Draft Approach document in June 2017. The Draft Revised Guidelines are currently at public consultation

stage. At the time of writing, the Guidelines have not yet been finalised and are not formally in place, therefore the 2006 Guidelines continue to apply to new developments. Notwithstanding this, the design and environmental assessment of the proposed project has taken due consideration of the proposed new guidelines (e.g. housing setback, zero shadow flicker, community engagement).

2.2.1.9 Code of Practice for Wind Energy Development in Ireland (DoCCAIE 2016)

This Code of Practice was published by the Department of Communications, Climate Action and Environment in December 2016). It addresses issues concerning engagement with the local community and community benefit. It is intended to ensure that wind energy development in Ireland is undertaken in accordance with the best industry practices, and with the full engagement of communities around the country.

Assessment of Compliance

- *The development of a wind energy project at this location will contribute to achieving our national renewable energy targets and meeting the objectives of the various EU, National and Regional policies and strategies to address climate change that are currently in place, as outlined above.*
- *A community participation and engagement programme will provide a gain for the community in the form of a community benefit fund. Further details are provided in **the EIAR (Volume 2, Chapter 1 and Volume 3, Appendix 1-4)**. This meets the requirements of the 2012 IWEA Best Practice Guidelines and the 2016 DCCAIE Code of Practice, which informed both the design and execution of the community engagement programme for the project.*
- *The 2006 Planning Guidelines and the 2012 IWEA Guidelines were consulted in considering the location of the proposed wind farm, its design and layout and also in assessing and, where applicable, mitigating its impact on the environment and the community in which it is located, with particular attention focused on the chapters of the EIAR that assess the specific impacts of wind farm development (i.e. noise, shadow flicker, biodiversity, land, soils, hydrology, landscape and visual, traffic and cultural heritage).*

2.3 REGIONAL PLANNING POLICY

The relevant Regional Policy for Co. Kerry, which is part of the Southern Regional Assembly, is set out in the Regional Spatial and Economic Strategy (RSES) for the Southern Region (adopted in January 2020). The RSES recognises and supports the many opportunities for onshore wind as a major source of renewable energy. Opportunities for both commercial and community wind energy projects should be harnessed, having regard to the requirements of DoHPLG Guidelines on Wind Energy. The RSES sets out the following Policy Objectives (RPO's) on renewable energy:

RPO 95 Sustainable Renewable Energy Generation

It is an objective to support implementation of the National Renewable Energy Action Plan (NREAP), and the Offshore Renewable Energy Plan and the implementation of mitigation measures outlined in

their respective SEA and AA and leverage the Region as a leader and innovator in sustainable renewable energy generation.

RPO 96 Integrating Renewable Energy Sources

It is an objective to support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate a renewable energy sources and ensure our national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grows.

RPO 97 Power Stations and Renewable Energy

It is an objective to support the sustainable technology upgrading and conversion of power stations in the Region to increase capacity for use of energy efficient and renewable energy sources.

RPO 98 Regional Renewable Energy Strategy

It is an objective to support the development of a Regional Renewable Energy Strategy with relevant stakeholders.

RPO 99 Renewable Wind Energy

It is an objective to support the sustainable development of renewable wind energy (on shore and off shore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.

Assessment of Compliance

- *The development of a wind energy development at the subject location in Co. Kerry will broadly contribute to meeting the aforementioned policy objectives on renewable energy for the Southern Region.*
- *The proposed Regional Renewable Energy Strategy will set targets for the Renewable Energy Sector as they evolve. The proposed development, should it proceed, would likely make a significant contribution to any future specific targets for the region.*

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

The Planning and Development Act 2000 (as amended) requires County Development Plans and variations to be consistent with the RSES and relevant national policy, with draft development plans or proposed variations to development plans to be referred by the relevant local authority to the

Regional Assembly. Kerry County Council are commencing the process of preparing the next County Development Plan.

2.4 LOCAL PLANNING POLICY

The proposed development is located in north Co. Kerry and therefore within the functional area of Kerry County Council.

The current County Development Plan (CDP) as at the date of this application is the Kerry CDP 2015-2021. The Kerry CDP is currently under review and the proposed new CDP 2022-2028 is at pre-draft stage. The current Kerry CDP outlines the overall strategy for the proper planning and sustainable development of County Kerry over the period 2015-2021, and sets out local policy for wind energy development.

Chapter 7 of the CDP contains the policy and objectives relating to Infrastructure, specifically Section 7.6 Energy/Power Provision, which includes a number of policies and objectives of relevance to renewable energy developments. Designated Wind Deployment Zones are illustrated on Map 7.6.

***Aim:** To support and provide for the sustainable development of indigenous energy resources, with an emphasis on renewable energy supplies, in the interests of economic progress and the proper planning and sustainable development of the county.*

***EP-1:** Support and facilitate the sustainable provision of a reliable energy supply in the County, with emphasis on increasing energy supplies derived from renewable resources whilst seeking to protect and maintain biodiversity, archaeological and built heritage, the landscape and residential amenity.*

***EP-3:** Facilitate sustainable energy infrastructure provision, so as to provide for the further physical and economic development of the County.*

***EP-7:** Facilitate the sustainable development of additional electricity generation capacity throughout the region/county and to support the sustainable expansion of the network. National grid expansion is important in terms of ensuring adequacy of regional connectivity as well as facilitating the development and connectivity of sustainable renewable energy resources.*

***EP-11:** Implement the Renewable Energy Strategy for County Kerry (KCC 2012)*

***EP-12:** Not to permit the development of windfarms in areas designated "open to consideration" in the Tralee and Listowel Municipal Districts until 80% of the turbines with permissions in those areas, on the date of adoption of the Plan, have either been erected or the relevant permission has expired or a combination of both and the cumulative effect of all permitted turbines in the vicinity of the proposal has been fully assessed and monitored.*

2.4.1 Kerry Renewable Energy Strategy 2012

The County's existing Renewable Energy Strategy (RES) is set out in the Kerry County Development Plan and was prepared as part of the 2009-2015 Plan (as varied). The policies and objectives for renewable energy are contained in Chapter 7 Section 7.4 and include specific objectives for wind, hydro, solar and biomass energy. The RES was adopted in November 2012. It is the current policy and zoning document that relates to wind energy development in the County and was prepared

having regard to the 2006 Wind Energy Development Guidelines. As part of the review of the current CDP, the current RES is also set to be reviewed. The RES identifies ‘Wind Deployment Zones’, i.e. appropriate locations for wind energy developments, Two categories of Wind Deployment Zones were identified and mapped – ‘Strategic Site Search Areas’ (red shading) and ‘Areas Open to Consideration’ (blue shading) (Refer to Map 7.6 of the CDP). Areas considered ‘Unsuitable’ were also identified and mapped. An excerpt from Map 7.6 showing the location of the proposed development site in an ‘Area Open to Consideration’ (blue shading) is shown in **Figure 1-4**.

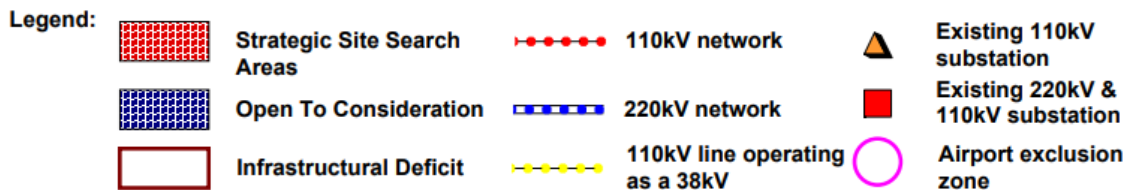
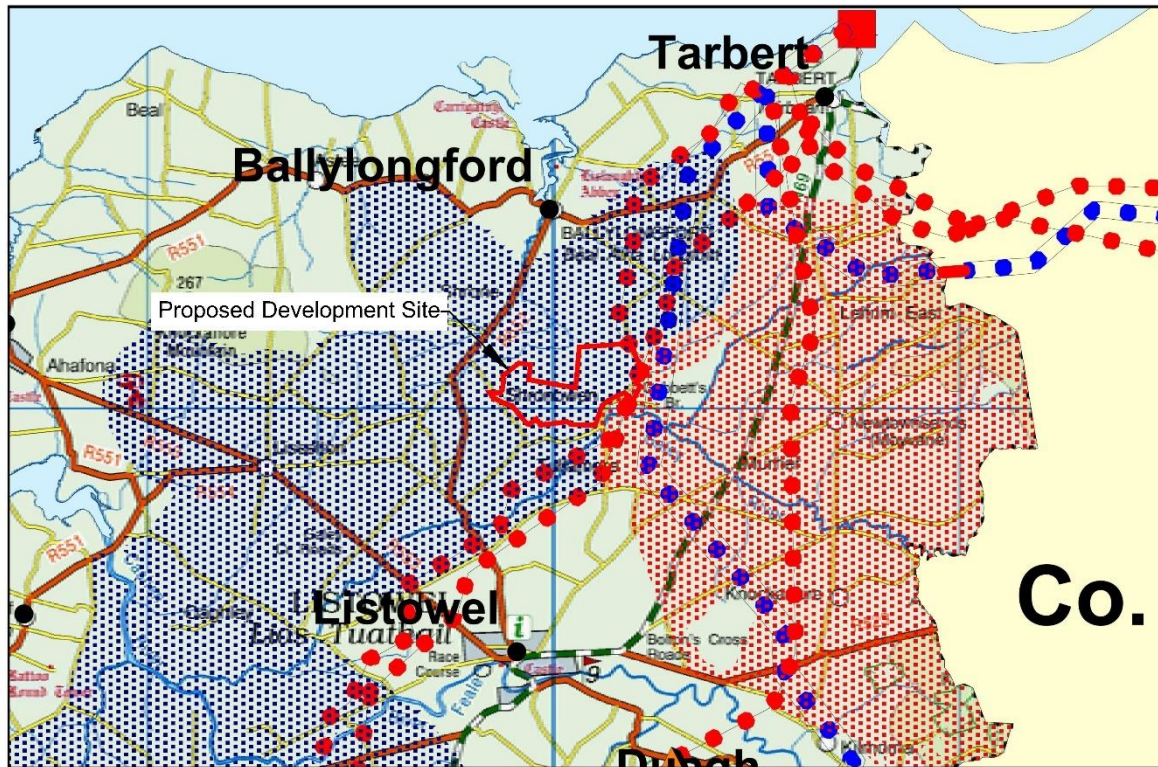


Figure 1-4 Extract from Kerry RES 2012 - Map 7.6 - Wind Deployment Zones

Assessment of Compliance

- *It is considered that the proposed wind farm will meet many of the policy objectives for renewable energy developments set out in the current Kerry CDP.*
- *The proposed wind farm is located within an area 'Open for Consideration' for wind energy developments as designated in the Kerry CDP and the Kerry RES.*
- *With regard to EP12, a review of the construction status of permitted wind farm developments in the Listowel and Tralee municipal districts was completed in Q1 2019 and submitted to Kerry County Council. The review concluded that over 80% have been installed or permission expired (of 63 permitted turbines, 54 are now built, which constitutes 85.71%). Kerry County Council agreed with this conclusion. The cumulative impact assessments in this EIAR have been completed taking account of all installed and permitted wind farms in the vicinity.*

2.5 EIAR ASSESSMENT METHODOLOGY**2.5.1 Legislative Context**

The Environmental Impact Assessment (EIA) Directive (European Union Directive 2011/92/EU and the amending Directive 2014/52/EU) on the assessment of the effects of certain public and private projects on the environment, requires Member States to ensure that a competent authority carries out an assessment of the likely significant effects of certain types of projects, as listed in the Directive, prior to development consent being given for the project.

EIA provisions in Irish Law in relation to planning consents are currently contained in the Planning and Development Act, 2000, (Part X) as amended, and in Part 10 of the Planning and Development Regulations, 2001, as amended. Both the Act and Regulations have recently been amended by the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) (EIA Regulations).

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

Strategic Infrastructure Development (SID) can generally be described as development which is of strategic economic or social importance to the State or a region. Such developments are covered by the Planning and Development (Strategic Infrastructure) Act 2006. Where the Board has issued notice to a prospective applicant that a proposed development is deemed to be strategic infrastructure development, an application for permission in writing for that proposed development may only be made to the Board and must be accompanied by an EIAR. The Board is also the competent authority for the purposes of EIAR.

This EIAR is compliant with the requirements set out in the Planning and Development Regulations 2001, as amended, and as set out in the EIA Directive in terms of the structure and content of the information required to be provided by the Applicant.

This EIAR has been prepared having regard to this legislation and national guidance, including European Commission's *Guidance on the preparation of the EIA Report (Directive 2011/92/EU as amended by 2014/52/EU) (2017)*, '*Guidelines on information to be contained in an Environmental Impact Statement, 2002*' and most recent '*Guidelines for Planning Authorities and An Bord Pleanála on carrying out EIA (August 2018)*'. Regard was also had to the published EPA draft '*Draft Guidelines on the information to be contained in Environmental Impact Assessment Report, 2017*'.

Due regard was also given to the Department of Environment, Heritage and Local Government Wind Energy Planning Guidelines published in 2006 and the Draft Revised Guidelines published in 2019 which will contain changes to the guidelines for noise, setback distances, shadow flicker and community consultation/dividend provision. However, whilst these proposed revisions are acknowledged in this Report, as they have not yet been finalised and published, the proposed development is assessed against the current Guidelines in place.

3 NOTE ON CLIMATE CHANGE

The Irish Government published the Climate Action Plan in 2019 to address climate disruption which is already impacting Ireland's environment, society, and economic and natural resources. Weather patterns are changing and becoming more extreme. If these weather events become more frequent, damage to homes and buildings from storms, wind and flooding will also become more frequent. Increasing global temperatures adversely affects ecosystems and biodiversity. Alternating cycles of drought and floods can profoundly impact soils and peat. Ireland is already witnessing seasonal rainfall intensity and seasonal water shortages.

Carbon savings and losses from the Shronowen Wind Farm were conservatively calculated using the methodology by the Scottish Government titled *Calculating carbon savings from wind farms on Scottish peatlands* (an excel worksheet). This is an established methodology which has been approved by the Scottish government and the Scottish Environmental Protection Agency (EPA).

The calculation takes account of the following losses in the construction of the wind farm;

- Losses due to turbine manufacture, construction & decommissioning
- Losses due to reduced plant fixation
- Losses due to leaching
- Losses from soil organic matter (peat)
- Losses due to felling forestry

The calculations show that the theoretical worst case 180,651 tonnes of CO₂ that will be lost due to the wind farm construction and operation will be recovered in two years. The actual recovery will be quicker. Over the 30-year lifespan of the wind farm, this accounts for 10% of the total amount of CO₂ emissions that will be offset. Over the lifespan of the wind farm, a total of 1,858,770 tonnes of CO₂ will be offset. This is a long-term beneficial effect.

In the context of climate change, there is the potential for increased storm events and severe weather during the operational life of the wind farm. Wind turbines are designed for specific wind parameters and will shut down during high wind speed events. Therefore, the potential effects of climate change on the operational development may involve curtailment where the turbines will be restricted from operation due to severe winds.

4 CONSULTATION WITH THE LOCAL COMMUNITY

From the outset of the Shronowen project, the Applicant engaged in consultation with the key stakeholders. Consultation was maintained throughout the environmental assessment period and comments from identified stakeholders and interested parties were solicited and highly encouraged. Consultation was initiated during the project design stage with the first public consultation event being held in September 2019. Subsequent scheduled public consultation events in April 2020 and August 2020 had to be postponed due to government restrictions during the COVID-19 pandemic. Letter mailing, two live online public consultation webinars and a virtual public consultation room (<https://www.innovision.ie/shronowen>) have been used to continue the consultation process while adhering to public health advice.

5 CONCLUSION

A host of legislation and policy exists at International, European and National level, which supports the development of renewable energy, and there are binding agreements for Ireland to increase the use of renewable energy. This report sought to highlight the relevant policies in the context of the Shronowen project.

The environmental studies and assessments completed demonstrate the project would not create an unacceptable impact on the environment and residential amenity. The proposed development is therefore in accordance with the proper planning and sustainable development of the area and will contribute towards achieving National and EU targets and in particular the objectives of the Climate Action Plan.