

## 2. BACKGROUND TO THE PROPOSED DEVELOPMENT

This section of the EIAR presents policy information on Energy and Climate Change policy and targets, the strategic, regional, and local planning context for the Proposed Development, scoping and consultation, and the cumulative impact assessment process.

### 2.1 Introduction

This section of the EIAR presents the policies and targets which have been put in place both nationally and internationally in relation to renewable energy and climate change. The details below set out the need for the Proposed Development to aid Ireland in meeting its national targets and European commitments in relation to climate change and decarbonisation.

The Proposed Development comprises the provision of a wind farm which is capable of generating approximately 120MW of renewable energy and provide it for use onto the national grid. The need to decarbonise the economy and reduce emissions has always been imperative, however in recent years the urgency involved has become clearer to all stakeholders. The Climate Action Plan published by the Government in 2021 sets out the detail for taking action to achieve a 51% reduction in overall greenhouse gas emissions by 2030, and to reach net-zero emissions by no later than 2050. The 2021 Plan builds on the measures and technologies set out in the 2019 Climate Action Plan to deliver greater ambition. The greater ambition requires a greater range of measures under the 2021 Plan, reflected in two categories of 'core measures' and 'further measures'. 'Core measures' set out to meet the 2030 targets cover the fundamentals of decarbonisation and include the development of a renewable energy electricity supply. These 'core measures' are not, by themselves sufficient to deliver the ambitions set out and so a series of 'further measures' will also be necessary which are more technically challenging or not yet available in Ireland at the scale required, e.g. Biogas/biomethane, green hydrogen, carbon capture and storage. While deploying all the core measures would reduce emissions by 10-11 MtCO<sub>2</sub>eq. by 2030, undertaking further measures could close the gap. All sectors will have to further their efforts from those outlined in the 2019 CAP if the core and further measures are to be achieved.

The primary driver behind the Proposed Development is the need to provide additional renewable energy to offset the use of fossil fuels within the electricity generating sector. Increasing electricity generation from wind power represents the most economical renewable option to reduce emissions within the power generation sector and is the most mature technology available to achieve national targets that have been established for decarbonisation.

This review of relevant policy contained in this Section of the EIAR concludes that the proposed Seven Hills Wind Farm is consistent with the overarching planning framework with regard to facilitating the move away from dependency on fossil fuels and the promotion of proper planning and sustainable development.

#### 2.1.1 Climate Change Policy and Targets

International and national policy consistently identifies the need to reduce greenhouse gas (GHG) emissions and stresses the importance of reducing global warming. The context of international policy has altered over the last 30-years from being of a warning nature to the current, almost universally accepted belief, that there is a climate change emergency occurring both within Ireland and at a broader global scale. The Intergovernmental Panel on Climate Change (IPCC)'s Sixth Assessment Report<sup>1</sup> published in 2021 provides a stark assessment of global climate change and presents evidence that climate

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<sup>1</sup> Climate Change 2021 'The Physical Science Basis' (Intergovernmental Panel on Climate Change, August 2021)

changes will increase in all regions of the globe over the coming decades and that much of the damage caused by climate change up to this point is now likely irreversible, such as the rise in sea levels over the 21<sup>st</sup> century. The Climate Status Report for Ireland 2020<sup>2</sup> similarly reflects on clear and distinct impacts arising from climate change effects within an Irish context:

- An increase in the number of warm spell days the last 60 years with very little change in cold spell duration;
- Annual precipitation was 6% higher in the period 1989–2018, compared with the 30-year period 1961–1990, and the decade 2006–2015 has been the wettest on record;
- Satellite observations indicate that the sea level around Ireland has risen by approximately 2–3mm per year since the early 1990s; and
- In 2018, carbon dioxide emissions were almost 18% higher than in 1990, primarily due to increased fossil fuel combustion in transport and energy industries

The IPCC's Sixth Assessment Report does not, however, conclude that a climate catastrophe is inevitable, but rather, there remains a 'narrow path' to determine the future course of climate, mainly by cutting emissions down to net zero. The Proposed Development will contribute to the decarbonisation of the energy sector and reduce harmful emissions. In this regard, it is in compliance with national and international climate change policy and targets.

### 2.1.1.1 International Policy

#### United Nations Framework Convention on Climate Change

In 1992, countries joined an international treaty, the United Nations Framework Convention on Climate Change (UNFCCC), as a framework for international efforts to combat the challenge posed by climate change. The UNFCCC seeks to limit average global temperature increases and the resulting climate change. In addition, the UNFCCC seeks to cope with impacts that are already inevitable. It recognises that the climate system is a shared resource whose stability can be affected by industrial and other emissions of carbon dioxide and other greenhouse gases. The framework set no binding limits on greenhouse gas emissions for individual countries and contains no enforcement mechanisms. Instead, the framework outlines how specific international treaties (called "protocols" or "Agreements") may be negotiated to set binding limits on greenhouse gases.

#### Kyoto Protocol

The Kyoto Protocol operationalises the UNFCCC by committing industrialised countries and economies in transition to limit and reduce GHG emissions in accordance with agreed individual targets. Ireland is a Party to the Kyoto Protocol, which came into effect in 2005, and as a result of which, emission reduction targets agreed by developed countries are now binding.

In Doha, Qatar, on 8<sup>th</sup> December 2012, the "*Doha Amendment to the Kyoto Protocol*" was adopted. The amendment includes:

- New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from 1<sup>st</sup> January 2013 to 31<sup>st</sup> December 2020;
- A revised list of greenhouse gases (GHG) to be reported on by Parties in the second commitment period; and
- Amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period.

<sup>2</sup> Climate Status Report for Ireland 2020 (Environmental Protection Agency, Marine Institute, Met Éireann, August 2021)

Under the protocol, countries must meet their targets primarily through national measures, although market-based mechanisms (such as international emissions trading) can also be utilised.

### **COP21 Paris Agreement**

COP21 was the 21<sup>st</sup> session of the Conference of the Parties (COP) to the UNFCCC. Every year since 1995 (excluding 2020 due to COVID-19), the COP has gathered the 196 Parties (195 countries and the European Union) that have ratified the Convention in a different country, to evaluate its implementation and negotiate new commitments. COP21 was organised by the United Nations in Paris and held from 30<sup>th</sup> November to 12<sup>th</sup> December 2015. COP21 closed with the adoption of the first international climate agreement (concluded by 195 countries and applicable to all). The 12-page text, made up of a preamble and 29 articles, provides for a limitation of the global average temperature rise to well below 2°C above pre-industrial levels and **to limit the increase to 1.5°C**. It is flexible and takes into account the needs and capacities of each country. The IPCC's 6<sup>th</sup> Assessment Report (2021) further collaborates this need to limit any increase in global average temperature to 1.5°C, stating that (underlined for emphasis),

*“Humanity has emitted 2,560 billion equivalent tons of CO<sub>2</sub> since 1750, and we only have a budget of 500 more if we want to limit warming to 1.5°C.*

*By following a trajectory of very low GHG emissions (SSP1-1.9), the threshold of 1.5°C will be reached in the short term, between 2021 and 2040, before being very slightly exceeded (1.6°C anticipated over the period 2041-2060) then respected in the long term (1.4°C anticipated over the period 2081-2100).*

*Everything is not lost, but we must pursue the Paris Agreement’s most ambitious goal of limiting warming to 1.5°C.”*

An article published by the IPCC on the 6<sup>th</sup> October 2018 titled ‘Global Warming of 1.5°C’, notes the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways; in the context of mitigation pathways, strengthening of the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty. This special report is part of an invitation contained in the Decision of the 21<sup>st</sup> Conference of Parties of the United Nations Framework Convention on Climate Change to adopt the Paris Agreement, and provides an update on the impact of climate change if emissions are not reduced.

### **COP25 Madrid**

COP25, the 25<sup>th</sup> session of the COP, was held between the 2<sup>nd</sup> and 13<sup>th</sup> of December 2019 in Madrid. The conference was characterised by repeated warnings from civil society (NGOs and corporates) on emerging evidence and scientific consensus on climate change risk. Specifically, it was noted that there are only c. ‘10 years left’ before the opportunity of limiting global warming to 1.5°C is no longer feasible. As such, the only remaining approach to limiting raising global temperatures is a ‘7.6% reduction of global GHG emissions every year between 2020 and 2030, and to reach net zero emissions by 2050’. However, consensus was not achieved between States on finalising the operating rules of the Paris Agreement and to ensure that it became operational by 2020. Three issues which emerged between States from the COP25 are summarised below:

- There was no uniform consensus between States to raise countries’ climate ambitions, e.g. to make increased commitments in light of growing climate change data. Some States were opposed to imposing any obligation on countries to submit enhanced pledges next year, arguing it should be each country’s own decision. All states were required to submit a review of their commitments for COP 26 in 2020. At the current level of climate targets, within a decade, the objective of the Paris Agreement will no longer be achievable;
- There was no agreement on finalising Article 6, the foundations for international cooperation to combat climate change. The aim was to establish the rules for new international mechanisms for financing and transferring GHG emission reductions; and

- There was no agreement on financing (Green Climate Fund); specifically, relating to both loss and damage caused by climate change.

Despite the lack of consensus on the above challenges, the COP25 did achieve more limited success with regard to the introduction of the “*San Jose Principles for High Ambition and Integrity of International Carbon Markets*”, which sets out the framework on which a robust carbon market should be built. These principles include, but are not limited to:

- Ensures environmental integrity and enables the highest possible mitigation ambition;
- Delivers an overall mitigation in global emissions, moving beyond zero-sum offsetting approaches to help accelerate the reduction of global greenhouse gas emissions;
- Prohibits the use of pre-2020 units, Kyoto units and allowances, and any underlying reductions toward Paris Agreement and other international goals; and
- Ensures that double counting is avoided and that all use of markets toward international climate goals is subject to corresponding adjustments.

These principles were supported by 23 EU, including Ireland, and Latin American countries, 5 no. pacific islands and 2 no. countries in the Caribbean.

### **COP26 Glasgow**

COP26 took place in Glasgow, Scotland between the 31<sup>st</sup> October and 12<sup>th</sup> November 2021. The summit was centred around the fact that “*climate change is the greatest risk facing us all.*” The UK, as hosts for the summit, have developed a ten point plan to deliver a green industrial revolution, seeking to lead the world in tackling and adapting to climate change.

The key items COP26 seeks to achieve are:

- Secure global net zero by mid-century and keep 1.5 degrees within reach
- Adapt to protect communities and natural habitats
- Mobilise finance
- Work together to deliver

All world leaders at the summit confirmed the need to urgently address the gaps in ambition and work together to achieve climate action.

The summit highlighted that the Paris Agreement is working, with leaders outlining national targets and efforts to further reduce emissions. There was a clear commitment to working together to achieve climate aims, with significant announcements including:

- “Over 40 leaders joined the Breakthrough Agenda, a 10-year plan to work together to create green jobs and growth globally, making clean technologies and solutions the most affordable, accessible and attractive option before 2030 – beginning with power, road transport, steel, hydrogen and agriculture.
- Over 120 countries covering more than 90% of the world’s forests endorsed the Glasgow Leaders’ Declaration on Forests & Land Use committing to work collectively to halt and reverse forest loss and land degradation by 2030, backed by the biggest ever commitment of public funds for forest conservation and a global roadmap to make 75% of forest commodity supply chains sustainable.
- A Just Energy Transition Partnership was announced to support South Africa’s decarbonisation efforts; a powerful example of collaboration between an emerging economy and international partners.
- The launch of the Global Methane Pledge saw over 100 countries committing collectively to reduce global methane emissions by 30% by 2030.”

## European Green Deal – European Climate Law (2021)

The European Green Deal, initially introduced by the European Commission in December 2019, sets out the 'blueprint' for a transformational change of the 27-country bloc from a high- to a low-carbon economy, without reducing prosperity and while improving people's quality of life, through cleaner air and water, better health and a thriving natural world. The Green Deal is intended to work through a framework of regulation and legislation setting clear overarching targets, e.g. **a bloc-wide goal of net zero carbon emissions by 2050 and a 55% cut in emissions by 2030 (compared with 1990 levels)**. This is a substantial increase compared to the existing target, upwards from the previous target of at least 40% (2030 Climate & Energy Framework), and furthermore, these targets demonstrate the ambition necessary to keep the global temperature increase to well below 2°C and pursue efforts to keep it to 1.5°C as per the Paris Agreement. With regard to the energy sector, the Green Deal focuses on 3 no. key principles for the clean energy transition, which will help reduce greenhouse gas emissions and enhance the quality of life for citizens:

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

The European Climate Law<sup>3</sup> writes into law the objectives set out above in the European Green Deal for Europe's economy and society to become climate-neutral by 2050. Climate neutrality by 2050 means achieving net zero greenhouse gas emissions for EU countries as a whole, mainly by cutting emissions, investing in green technologies and protecting the natural environment. The Climate Law includes:

- A legal objective for the Union to reach climate neutrality by 2050;
- An ambitious 2030 climate target of at least 55% reduction of net emissions of greenhouse gases as compared to 1990, with clarity on the contribution of emission reductions and removals;
- A process for setting a 2040 climate target, taking into account an indicative greenhouse gas budget for 2030-2050 to be published by the Commission;
- A commitment to negative emissions after 2050;
- The establishment of European Scientific Advisory Board on Climate Change, that will provide independent scientific advice;
- Stronger provisions on adaptation to climate change; and
- Strong coherence across Union policies with the climate neutrality objective

The law aims to ensure that all EU policies contribute to this goal and that all sectors of the economy and society play their part. All 27 no. EU Member States have committed to turning the EU into the first climate neutral continent by 2050. One third of the 1.8 trillion-euro investments from the NextGenerationEU Recovery Plan, and the EU's seven-year budget, will finance the European Green Deal. On 14<sup>th</sup> July 2021, the European Commission adopted a set of proposals<sup>4</sup> to make the EU's climate, energy, transport and taxation policies fit for reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels. Achieving these emission reductions in the next decade which is crucial to Europe becoming the world's first climate-neutral continent by 2050 would clearly be assisted by the Proposed Development.

<sup>3</sup> European Climate Law was published in the Official Journal on 9 July 2021 and came into force on 29 July 2021.

<sup>4</sup> 'Fit for 55': delivering the EU's 2030 Climate Target on the way to climate neutrality (July 2021)

## 2.1.1.2 National Policy

### Programme for Government (2020)

The Programme for Government 2020 (June 2020) places specific emphasis on climate change, stating that the next ten years are a critical period in addressing the climate crisis, and therefore, a deliberate and swift approach to reducing more than half of Ireland's carbon emissions over the course of the decade (2020-2030) must be implemented. The programme states that the government are committed to reducing greenhouse gas emissions by an average 7% per annum over the next decade in a push to achieve a net zero emissions by the year 2050.

With regard to energy generation, the Programme notes that the government is committed to the rapid decarbonisation of the energy sector. The Programme states the government's ongoing support and commitment to take "*the necessary action to deliver at least 70% renewable electricity by 2030.*" While it is noted this has been updated by the 2021 Climate Action Plan, the Programme for Government sets out a range of measures to achieve this target which remain relevant, including:

- Finalise and publish the Wind Energy Guidelines
- Continue Eirgrid's programme 'Delivering a Secure, Sustainable Electricity System'
- Strengthen the policy framework to incentivise electricity storage and interconnection
- Produce a whole-of-government plan setting out how we will deliver at least 70% renewable electricity by 2030

### The Climate Action and Low Carbon Development (Amendment) Act (2021)

The Climate Action and Low Carbon Development (Amendment) Act 2021, which was signed into law on the 23<sup>rd</sup> July 2021, 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 Act provides the framework for Ireland to meet its international and EU climate commitments and to become a leader in addressing climate change. As indicated by the premise of the legislation, the reduction of emissions is a key proponent of the Climate Action and Low Carbon Development (Amendment) Act 2021 and 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;
- The role of the Climate Change Advisory Council has been strengthened;
- The government must adopt carbon budgets that are consistent with the Paris agreement and other international obligations;
- Actions for each sector will be detailed in the Climate Action Plan which must be updated annually; and
- Local Authorities must prepare individual Climate Action Plans which will include both mitigation and adaptation measures and will be updated every five years.

The project represents a significant opportunity be a nationally important wind energy generator, contributing to the 51% reduction in emissions being sought, which is as outlined above a legally binding requirement. The Proposed Development is therefore considered compliant with the relevant policies and objectives set out at both the European (e.g. European Green Deal) and National tiers of



governance in this regard. Report of the Joint Committee on Climate Action - Climate Change: A Cross-Party Consensus for Action (2019)

In March 2019, the Joint Committee on Climate Action Change released a report detailing a cross party consensus for action. The report in its introduction states that *“Ireland’s performance in meeting international obligations has to date been poor”* (refer to ‘Emissions Projections for Ireland’ below). The Report highlights on-going concern regarding emission projections and growing evidence that Ireland is off track in meeting its 2030 targets under the relevant the EU Directives.

The report states that the transformation of Ireland’s energy system will be required for the country to meet its future 2030 and 2050 GHG emission targets; specifically, in order to reach net zero emissions by 2050, Ireland will be required to fully decarbonise electricity generation. Therefore, there is a clear incentive for developing, and safeguarding, Ireland’s capacity in renewable energies and renewable electricity. Since this report was published, the Climate Action and Low Carbon Development (Amendment) Act 2021 has been enacted and there have been recent progress / future scenario assessments (e.g. EirGrid’s ‘All Island Generation Capacity Statement 2021 – 2030’ (September 2021)).

Given the clear concern that the county’s future emissions targets may be missed, it is crucial that projects such as the Proposed Development which can contribute in a meaningful manner towards climate change targets and which can be provided without significant adverse environmental effects arising are brought forward and supported with favourable consideration through the planning system and constructed.

### Climate Action Plan 2021 (the “Plan”)

The Climate Action Plan 2021 (‘the Plan’) published on the 4<sup>th</sup> of November 2021, sets out the detail for taking action to achieve a 51% reduction in overall greenhouse gas emissions by 2030, and to reach net-zero emissions by no later than 2050. The 2021 Plan builds on the measures and technologies set out in the 2019 Climate Action Plan to deliver greater ambition. The greater ambition requires a greater range of measures under the 2021 Plan, reflected in two categories of ‘core measures’ and ‘further measures’. ‘Core measures’ set out to meet the 2030 targets cover the fundamentals of decarbonisation and include the development of a renewable energy electricity supply. These ‘core measures’ are not, by themselves sufficient to deliver the ambitions set out and so a series of ‘further measures’ will also be necessary which are more technically challenging or not yet available in Ireland at the scale required, e.g. Biogas/biomethane, green hydrogen, carbon capture and storage. While deploying all the core measures would reduce emissions by 10-11 MtCO<sub>2</sub>eq. by 2030, undertaking further measures could close the gap. All sectors will have to further their efforts from those outlined in the 2019 Plan if the core and further measures are to be achieved. Figure 4.3 of the Plan, copied below illustrates the impacts across the sectors.

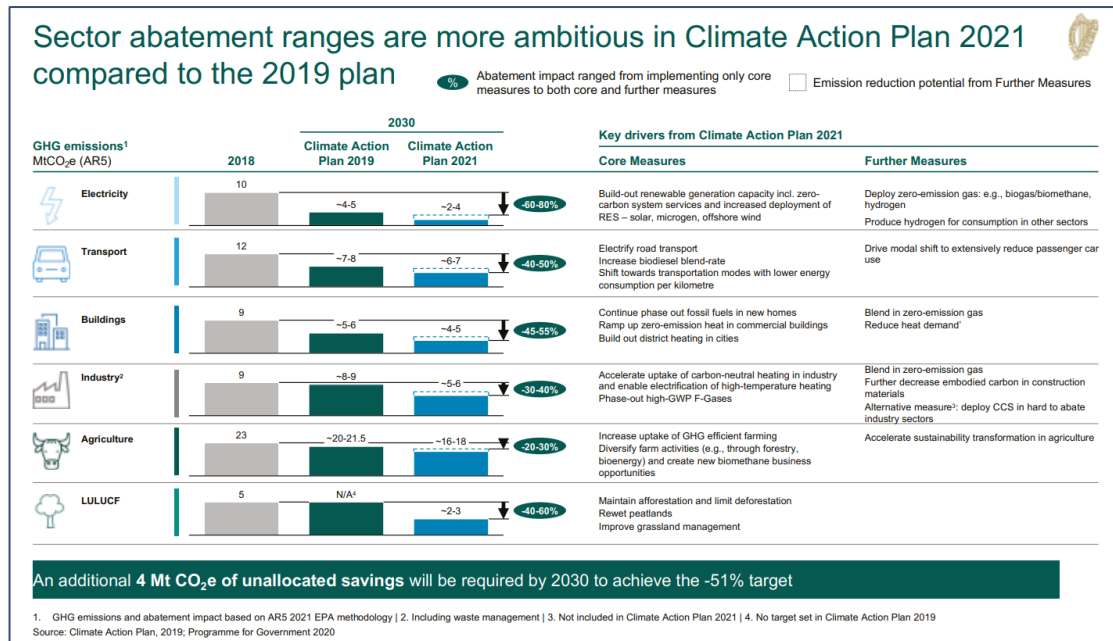


Figure 2-1: CAP 2021 and CAP 2019 Sector Abatement Ranges

With regards electricity, the Plan aims to increase the proportion of renewable electricity up to 80% by 2030. The Plan highlights that “sustained efforts across sectors will be required to meet targets” and for electricity “The proposed pathway includes a more rapid build-out of renewable generation capacity (wind and solar power generation technologies), increased storage, and the deployment of zero-emissions gas. The decarbonisation pathway for the electricity sector is challenging given the rapid growth in demand for power, as well as the need to ensure security of supply through the decarbonisation journey.” To achieve the 80% renewable electricity envisioned, the indicative onshore wind capacity is set in the Plan at up to ~8GW.

Section 11 of the Plan considers electricity specifically and notes that in 2018 electricity accounted for 16.2% of Ireland's greenhouse gas (GHG) emissions. The intention is to continue to decarbonise the electricity sector by “taking advantage of our significant renewable energy resources...” The Plan continues:

*“The share of electricity from renewable energy increased almost five-fold between 2005 and 2018 – from 7.2% to 33.7% – an increase of over 26 percentage points in 13 years. This increase in the share of renewables came despite a rise in the total demand for electricity. In absolute terms, there has been a more than six-fold increase in the volume of renewable electricity generated, from 1,873 GWh in 2005 to 11,780 GWh in 2019.”*

Despite the positive trends, the Plan states that “Additional electricity generation and transmission infrastructure will be a critical enabler to achieve our renewable energy and emissions targets” and “total electricity demand over the next ten years is forecast to grow by between 19% and 50%...” The dedicated electricity targets to meet the required level of emissions reduction by 2030 are set out at Section 11.2 of the Plan as follows:

- Reduce CO<sub>2</sub>eq. emissions from the sector to a range of 2 to 4 MtCO<sub>2</sub>eq. by 2030
- Carry out a work programme to identify a route to deliver 1-3 TWh of zero emissions gas (including green hydrogen) by 2030, potentially equivalent to 0.2-0.4 MtCO<sub>2</sub>eq. abatement

The climate targets set out will be delivered through a set of enabling targets by 2030, as follows:



- *“Increasing the share of electricity demand generated from renewable sources to up to 80% where achievable and cost effective, without compromising security of electricity supply*
- *At least 500 MW of these renewables will be delivered through local community-based projects, subject to competition as appropriate*
- *Deliver circa 2 GW of new flexible gas-fired power stations in support of a high variable renewable electricity system*
- *Delivery of three new transmission grid connections or interconnectors to Northern Ireland, Great Britain, and the EU*
- *Explore further interconnection, including hybrid interconnectors (combined cross border transmission network with offshore renewable generation), to other countries*
- *Expand and reinforce the grid – through the addition of lines, substations, and new technologies*
- *Complete the phase-out of coal and peat-fired electricity generation*
- *Ensure that 20-30% of system demand is flexible by 2030”*

Large scale renewable generation is identified as a key measure in meeting the targets set out and includes: (inter alia)

- *“Achieving the renewable electricity target of up to 80% will entail investment of tens of billions of euro, including in the installation and maintenance of generation assets, and associated infrastructure and services, as well as in the development of supply chains and port infrastructure*
- *The SEAI’s Methodology for Local Authority Renewable Energy Strategies (LARES) will be revised, with input from relevant bodies, to provide a best practice approach to identifying and assessing renewable energy resources in spatial planning at local authority level. Based on the indicative targets for onshore wind energy and grid-scale solar deployment, the Department of the Environment, Climate and Communications (DECC) will set out a target for the total onshore capacity that should be planned for on a national and regional level. The regional assemblies will be required to develop and implement regional renewable electricity strategies based on the overall national targets, renewable energy objectives contained in each of the Regional Spatial and Economic Strategies, and the support of relevant guidance, including the SEAI LARES. National renewable energy objectives, and those set out in the regional strategies, should be reflected in County Development Plans, which are evaluated and assessed by the Office of the Planning Regulator*
- *We will continue to roll out regular competitive auctions under the Renewable Electricity Support Scheme (RESS) to deliver our targets and ensure a steady supply pipeline of projects and efficient use of the network. We will publish an indicative RESS auction timetable every three years to provide clarity for investors*
- *EirGrid will carry out further grid, operational and market studies to understand any additional measures, beyond current plans, to facilitate reduced sectoral emissions ceilings and, therefore, support annual renewable electricity share of up to 80%”*

A range of specific Actions are set out in the Plan with regards the various sectors; for the electricity sector the following are specifically relevant:

- Action 100: *“Ensure a supportive spatial planning framework for onshore renewable electricity generation development.”*
- Action 102: *“Deliver regular Onshore Renewable Electricity Support Scheme auctions that aligns with spatial and planning policy and efficient use of the network.”*
- Action 112: *“Develop the onshore electricity grid to support renewable energy targets.”*

## Emissions Projections for Ireland (2020 – 2040)

In June 2021, the EPA published an update on *Ireland's Greenhouse Gas Emission Projections 2020-2040* (the "Report") using the latest Inventory data for 2019. The report provides an assessment of Ireland's progress towards achieving its emission reduction targets for 2020 and 2030 as set out under the EU Effort Sharing Decision (ESD) and Effort Sharing Regulation (ESR). Ireland's 2020 target under the ESD is to achieve a 20% reduction on 2005 levels of non-Emissions Trading Scheme (non-ETS) sector emissions (agriculture, transport, residential, commercial, non-energy intensive industry, and waste) with annual binding limits are set for each year over the period 2013-2020. Ireland's 2030 target under the Effort Sharing Regulation (ESR) is a 30% reduction of emissions compared to 2005 levels by 2030. The key findings set out within the report concerning Ireland's progress towards these targets, and relevant to the subject development, the overall decarbonising of the national energy system, are summarised below:

- **2020 Targets:** Ireland's emissions covered by the 2013-2020 EU Effort Sharing Decision target are estimated to have been 7% below 2005 levels in 2020. Ireland is estimated to have cumulatively exceeded its compliance obligations by 12.2 Mt CO<sub>2</sub> eq over the 2013-2020 period, and will need to use credits and/or purchase surplus annual emission allocations from other member states to achieve compliance.
- **2030 Targets:** These Projections indicate that Ireland can meet its non-ETS EU targets over the period 2021 to 2030 assuming full implementation of the 2019 Climate Action Plan and the use of the flexibilities available. Future, more ambitious targets as presented in the European Climate Law and Ireland's Climate Bill will require many (as yet unidentified) additional measures.
- **Decarbonising Electricity Generation:** Increased renewable electricity generation, including a projected 5GW of offshore wind generation, is expected to contribute to a 70% contribution of renewable energy in electricity generation by 2030. Energy industries emissions are projected to decrease by one third by 2030 compared to the most recent figures in 2019.

The Climate Action and Low Carbon Development (Amendment) Act 2021 has been brought into force since this Report was published and Ireland's up to date objectives are set out above.

The Report assesses the future emission projections under two scenarios: 'With Existing Measures' and 'With Additional Measures'. The 'With Existing Measures' scenario assumes that no additional policies and measures, beyond those already in place by the end of 2019 are implemented. The 'With Additional Measures' scenario assumes implementation of the 'With Existing Measures' scenario in addition to further implementation of Government renewable and energy efficiency policies and measures, as set out in the CAP 2019. Greenhouse gas emissions projections show total emissions decreasing from 2019 levels by 3% by 2030 under the With Existing Measures scenario and by 20% under the With Additional Measures scenario.

The energy sector contributed 15.8% of Ireland's total emissions in 2019 and is projected to decrease to 13.3% in 2030 (in the With Additional Measures scenario). The key trends underpinning the future progress of the sector under both scenarios are described below (underlined for emphasis):

- With Existing Measures
  - Emissions from the energy industries sector are projected to increase by 1.4% to 8.6 Mt CO<sub>2</sub> eq over the period 2020 to 2030
  - In terms of the renewable energy generated, this scenario projects Ireland reaching approximately 40% of electricity consumption from renewable energy by 2020. Renewable electricity generation capacity is dominated by wind energy. In 2030 it is estimated that renewable energy generation increases to approximately 55% of electricity consumption.

### ➤ With Additional Measures

- Emissions from the energy industries sector are projected to decrease by 24.8% to 6.3 Mt CO<sub>2</sub> eq over the period 2020 to 2030
- Assumed that for 2020 there is approximately a 40% share of renewable energy in electricity generation. In 2030 it is estimated that renewable energy generation increases to approximately 70% of electricity consumption. This is mainly a result of further expansion in wind energy (comprising 3.5 GW offshore and approximately 8.2 GW onshore).

In the context of Ireland's failure to meet the 2013-2020 EU targets for greenhouse gas emissions reductions and the possible outcomes under the above scenarios, the EPA emphasises the need for a 'significant and immediate' response to reducing carbon emissions:

*"However, for Ireland to meet the more ambitious targets as presented in the European Climate Law [55% emission reduction by 2030 as per 1990 levels] and Ireland's Climate Bill [51% emission reduction by 2030], and to transform to a climate resilient, biodiversity rich and climate neutral economy by 2050, there needs to be a significant and immediate increase in the scale and pace of greenhouse gas emission reductions. A 'green recovery' will give Ireland an opportunity to rebuild our economy and generate new jobs while responding to this challenge."*

While it is clear that progress is on-going, it is also apparent that there are still significant challenges which will need to be overcome if Ireland is to achieve its 2030 emission targets. Specifically, the EPA states that the level of annual emissions reductions required to achieve a 51% emissions reduction by 2030 (Climate Action and Low Carbon Development (Amendment) Act 2021) is far greater than what is estimated to have occurred due to the COVID lockdown measures in 2020. As decarbonising electricity generation will have a significant positive contribution in achieving Ireland's emissions it is clear that additional renewable energy production such as that of the Proposed Development must be encouraged and supported if carbon saving targets are to be met.

### 2.1.1.3 Renewable Energy Policy and Targets

Renewable energy development is recognised as a vital component of Ireland's strategy to tackle the challenges of combating climate change and ensuring a secure supply of energy. Ireland's import dependency was 67% in 2018, down from an average of 89% between 2001 and 2015, arising from the beginning of production of gas from the Corrib field and increasing use of indigenous renewable energy. Notwithstanding this improvement, Ireland remains one of the most import fuel dependent countries in the EU; specifically, oil accounted for 73% of total energy imports, natural gas 17%, coal 8.2% and renewables 1.4%<sup>5</sup>. SEAI's 'Energy in Ireland – 2020 Report' (December 2020) further expands upon the above analysis, noting that "Oil has by far the largest share of final energy use at 57% in 2019, more than all other fuel types combined. Transport and home heating account for 86% of oil use." The most significant changes noted in the report in terms of fuels included:

- Fossil fuels accounted for 87% of all the energy used in Ireland in 2019. Demand for fossil fuels fell by 3% in 2019, and was 17% lower than in 2005;
- Coal use decreased by 53% in 2019 and its share of total primary energy requirement fell to 2.6%, down from 10.5% in 2015.
- Total renewable energy increased by 10.3% during 2019. Hydro and wind increased by 28% and 16% respectively. The overall share of renewables in primary energy stood at 11.2% in 2019, up from 10% in 2018.
- Ireland returned to being a net importer of electricity in 2019 for the first time since 2015, importing 55 ktoe.

<sup>5</sup> SEAI 'Energy Security in Ireland – 2020 Report' (September 2020)

This high dependency on energy imports is highly risky and Ireland is currently extremely vulnerable both in terms of meeting future energy needs and ensuring price stability. Against this backdrop, the SEAI states that,

*“The development of indigenous, distributed renewable energy sources mitigates many of the risks associated with relying on global supply chains and large single pieces of infrastructure, and reduces the exposure to fossil fuel price shocks.”*

The Programme for Government (2020) also highlights the need for a clean and reliable supply of energy:

*“Energy will play a central role in the creation of a strong and sustainable economy over the next decade. The reliable supply of safe, secure and clean energy is essential in order to deliver a phase-out of fossil fuels. We need to facilitate the increased electrification of heat and transport. This will create rapid growth in demand for electricity which must be planned and delivered in a cost-effective way.”*

The projected demand for electricity is clear and to meet that demand viable projects such as that the proposed renewable energy development can directly contribute to Ireland’s energy and climate targets.

#### 2.1.1.4 EU Legislation

The 2030 Climate and Energy Framework (adopted by EU leaders in October 2014) represents the current governance system underpinning EU renewable energy policy. The framework defines EU wide renewable energy targets, which builds on the 2020 climate and energy package:

- A binding commitment at EU level of at least 40% domestic Green House Gas reduction by 2030 compared to 1990;
- An EU wide, binding target of at least 27% renewable energy by 2030; and
- An indicative EU level target of at least 27% energy efficiency by 2030.

The European Commission published its proposal for an Effort Sharing Regulation on the allocation of national targets for greenhouse gas emissions for the period 2021-2030 in May 2018. The Effort Sharing legislation forms part of a set of policies and measures on climate change and energy that will help move Europe towards a low-carbon economy and increase its energy security. Under the current Regulation, the national targets will collectively deliver a reduction of around 10% in total EU emissions from the sectors covered by 2020 and of 30% by 2030, compared with 2005 levels.

The proposal implements EU commitments under the Paris Agreement on climate change (COP21), discussed above in Section 2.1.1.1, and marks an important milestone in the allocation to Member States of a package of climate targets formally adopted as part of the 2030 Climate and Energy Framework.

The revised Renewable Energy Directive (EU) 2018/2001 came into force in December 2018. It establishes a binding EU target of at least 32% for 2030 with a review for increasing this figure in 2023. The revised Directive sets a 2030 target of 32.5% energy from renewable sources with a potential upward revision in 2023.

The European Green Deal was launched in December 2019 and proposes to increase the binding target of renewable sources in the EU’s energy mix from 32% to **40% by 2030** via amendments to the Renewable Energy Directive (Renewable Energy Directive) as per the ‘Fit for 55’ package (July 2021)<sup>6</sup>. This supports Member States in making the most of their cost-effective renewable energy potential across sectors through a combination of sectoral targets and measures. It aims at making the energy system cleaner and more efficient by fostering renewables based electrification and, in sectors such as industry and transport where this is more difficult, it will promote the uptake of renewable fuels.

<sup>6</sup> <https://www.consilium.europa.eu/en/policies/eu-plan-for-a-green-transition/>

## Energy Roadmap 2050

The Energy Roadmap 2050 was published by the European Commission in 2011 and analyses the transition of the contemporary energy system in ways that would be compatible with the greenhouse gas reductions targets as set out in the Renewable Energy Directive (Directive 2009/28/EC) while also increasing competitiveness and security of supply. To achieve these targets and objectives, the Roadmap states that significant investments will need to be made in new low-carbon technologies and renewable energy, e.g. wind energy infrastructure, energy efficiency and grid infrastructure. Five main routes are identified to achieving a more sustainable, competitive and secure energy system in 2050:

- High Energy Efficiency;
- Diversified Supply Technologies;
- High Renewable Energy Sources;
- Nuclear energy; and
- Carbon capture and storage.

The analysis found that decarbonising the energy system is technically and economically feasible. The Roadmap notes that all scenarios show the biggest share of energy supply technologies in 2050 comes from renewables. In this regard, it should be noted that the Climate Change Advisory Council states within their 2020 Annual Review (September 2020) that, “*while the share of renewable electricity generation, particularly wind, is increasing [in Ireland], the [overall] pace of decarbonisation of the [electricity generation] sector needs to accelerate*”, as it is not compatible with a low-carbon transition to 2050. As such, a major prerequisite for a more sustainable and secure energy system is a higher share of renewable energy up to and beyond 2030 to 2050. Each of the scenarios assumes in the analysis that increasing the share of renewable energy and using energy more efficiently are crucial, irrespective of the particular energy mix chosen.

## Progress on Targets

The SEAI *Renewable Energy in Ireland 2020 Update* was published in April 2020 and set out the most recent updates to Ireland’s progress towards its binding European and National renewable energy targets. Based on confirmed 2018 data, the primary conclusion of the report relates to Ireland’s overall renewable energy supply representing 11% of gross final consumption (EU target of 16%). Against this backdrop, Ireland had the second lowest progress to meeting the overall RES target of all EU Member States (26<sup>th</sup> out of the EU-28). With regard to Ireland’s national renewable energy target for 2020, the 2018 data indicates that Ireland is not on track to meet any of its 2020 renewable energy targets:

- 33.2% renewable electricity by 2020 (target is 40%) - up from 30.1% in 2017;
- 6.5% renewable heat by 2020 (target is 12%); and
- 7.2% renewable transport by 2020 (target is 10%).

The Climate Change Advisory Council notes within their *2019 Annual Review* that while the share of renewable electricity generation, particularly wind, is increasing in Ireland, the pace of decarbonisation of the electricity generation sector is not compatible with a low-carbon transition to 2050. As such, Ireland can continue to ‘comply’ with EU targets by purchasing emission allowances; however, the expenditure of public funds to do so would not result in any domestic benefit, and furthermore, would result in a more difficult and expensive challenge for the country to meet its future 2030 targets and beyond. The *Review* concludes that continued and additional investment in capacity and technologies in the renewable energy sector is required to reach these said targets.

Drawing on the 2030 Climate and Energy Framework EirGrid’s ‘*All Island Generation Capacity Statement 2021 – 2030*’ (September 2021) states that the national power system will require unprecedented change over this decade, “a fundamental transition for our electricity sector”, in order to accommodate at least 70% of electricity from renewable sources by 2030. The retiring of traditional fossil fuel plant (coal, peat and oil-fired generators), c. 1,650MW of generation over the next 5-years within Ireland, further emphasises the need for a deliberate and swift transition to a low-carbon power

system based on renewable energy, natural gas and ancillary supporting infrastructure. With regard to wind energy, the *All Island Generation Capacity Statement 2021 – 2030* states that,

*“It can be assumed that Ireland’s renewable targets will be achieved largely through the deployment of additional wind powered generation.”*

New onshore wind farms commissioned in Ireland in 2020 brought the total wind capacity to 4,300MW, contributing to the increase in overall RES percentage to 43.3%. This value is set to increase as Ireland endeavours to meet its 2030 renewable targets; specifically, the *All Island Generation Capacity Statement 2021 – 2030* estimates that onshore wind energy will increase by 1,000MW between 2020 and 2025. With regard to wind energy, the Statement states that,

*“It can be assumed that Ireland’s renewable targets will be achieved largely through the deployment of additional wind powered generation.”*

Long-term system electricity demand in Ireland is increasing and is forecast to increase significantly, due to the expected expansion of many large energy users (e.g. data centres). EirGrid’s analysis concludes that, for the Median demand level, there may not be adequate generation capacity to meet demand from 2026 for Ireland should Moneypoint power station close and long term demand continue to rise. In a scenario where any other plant of equivalent capacity closes during this timeframe, earlier deficits could arise. EirGrid also references poor availability of the generation fleet, as exemplified within 2018 and 2019, could give rise to adequacy deficits in 2025. In this context, the importance of wind energy becomes more apparent as it is estimated that 1 MW of wind capacity can provide enough electricity to supply approximately 650 homes<sup>7</sup>. Accordingly, the Proposed Development will serve to only contribute to meeting this increasing electricity demand.

EirGrid have also released their *Strategy 2020-2025: Transform the Power System for Future Generations* which is driven by climate change and the need to transform the electricity sector. Currently, the electricity grid can operate with up to 65% of renewable power but by 2030 this must increase to 95%. SEAI’s National Energy Projections to 2030 notes that wind energy deployment has *“made the most significant contribution to RES-E to date. The historic build rate (2005-2010) was 180MW per year. Since 2010 the build rate has increased to an average of over 200MW per year. In 2017 the installed capacity increased by 335MW to just over 3.3GW total installed capacity.”* Furthermore, *“Post 2020, as electricity demand continues to grow at an anticipated rate of 3% per annum, increasing levels of deployment will be needed just to maintain the share achieved in 2020.”*

The additional wind energy output of 120 MW from the proposed Seven Hills Wind Farm will further assist Ireland’s overall capability to meet its future targets.

#### 2.1.1.5 National Policy on Renewable Energy

##### White Paper on ‘Ireland’s Transition to a Low Carbon Energy Future’ 2015 - 2030

On 12<sup>th</sup> May 2014, the Green Paper on Energy Policy in Ireland was launched which marked the start of a public consultation process on the future of Ireland’s energy policy over the medium to long-term. The Department of Communications, Climate Action & Environment acknowledged that energy is an integral part of Ireland’s economic and social landscape and that *“a secure, sustainable and competitive energy sector is central to Ireland’s ability to attract and retain Foreign Direct Investment and sustain Irish enterprise. The three key pillars of energy policy are to focus on security, sustainability and competitiveness”*.

<sup>7</sup> <https://www.iwea.com/about-wind/faqs>



Following on from an extensive consultation process, a Government White Paper entitled ‘*Ireland’s Transition to a Low Carbon Energy Future 2015-2030*’ was published in December 2015 by the (then) Department of Communications, Energy and Natural Resources (“DCENR”). This Paper provides a complete energy update and a framework to guide policy up to 2030. The Paper builds upon the White Paper published in 2007 and takes into account the changes that have taken place in the energy sector since 2007.

The policy framework was developed to guide policy and actions that the Irish Government intends to take in the energy sector up to 2030 and also reaching out to 2050 to ensure a low carbon future that maintains Ireland’s competitiveness and ensures a supply of affordable energy. The Energy Vision 2050, as established in the White Paper, describes a ‘*radical transformation*’ of Ireland’s energy system which will result in GHG emissions from the energy sector reducing by between 80% and 95%, compared to 1990 levels. The paper advises that a range of policy measures will be employed to achieve this vision with emphasis on the generation of electricity from renewable sources, which there are plentiful indigenous supplies and increasing the use of electricity and bio energy to heat homes and fuel transport.

In this White Paper, the DCENR acknowledges that onshore wind is one of the cheapest forms of renewable energy in Ireland, stating that:

*“Onshore wind continues to be the main contributor (18.2% of total generation and 81% of RES-E in 2014). It is a proven technology and Ireland’s abundant wind resource means that a wind generator in Ireland generates more electricity than similar installations in other countries. This results in a lower cost of support.”*

### National Energy Security Framework

More recently, the National Energy Security Framework (April, 2022) highlights clearly the impacts the Russian invasion of Ukraine and the resulting war has had on Europe’s energy system. The resulting decision by the European Union to phase out the import of Russian gas, oil and coal has brought to the fore the importance of security of supply and how energy policy is designed for long-term resilience. It takes account of the need to decarbonise society and economy, to reduce Ireland’s emissions by 51% over the decade to 2030 and reach net zero emissions by 2050. According to the SEAI’s Energy in Ireland (2020) report, oil accounts for 54% of Ireland’s primary energy requirement making it one of the highest rate of oil dependency in the EU. The International Energy Agency, of which Ireland is a member country, includes a 10-point plan to cut oil use which calls for an acceleration in the deployment of wind and solar projects. Ireland’s response per the Framework is set out over three themes:

- Theme 1 – managing the impact on consumers and businesses
- Theme 2 – ensuring security of energy supply in the near-term
- Theme 3 – reducing our dependency on imported fossil fuels in the context of the phasing out of Russian energy imports across the EU

In relation to theme 3 the Framework highlights that replacing fossil fuels with renewables, including wind energy, will be a focus area of work. The Framework calls for “*Supportive policies across Government and State agencies*” which “*can reduce barriers and fast track permitting for renewable energy generation projects. Similarly, renewable energy developers need to match this through taking a leadership role in delivering high quality applications to relevant consenting authorities, meeting project milestones on time and minimising delays.*” Response 25 set out is in relation to the alignment of all elements of the planning system to support accelerated renewable energy development.

## 2.2.1 National Policy

### 2.2.1.1 National Planning Framework: Project Ireland 2040

The National Planning Framework (NPF), published in February of 2018, forms the top tier of the national planning policy structure which establishes the policy context for the Regional Spatial and Economic Strategies (RSES) and local level development plans. In an effort to move away from developer led development to one informed by the needs and requirements of society up to 2040, a number of objectives and policies have been put in place in order for the country to grow and develop in a sustainable manner.

- Developing a new region-focused strategy for managing growth;
- Linking this to a new 10-year investment plan, the Project Ireland 2040 National Development Plan 2018-2027;
- Using state lands for certain strategic purposes;
- Supporting this with strengthened, more environmentally focused planning at local level;
- and
- Backing the framework up in law with an Independent Office of the Planning Regulator.

The NPF notes that the population of Ireland is projected to increase by approximately 1 million people by 2040 which will result in a population of roughly 5.7 million. This population growth will place further demand on both the built and natural environment. In order to strengthen and facilitate more environmentally focused planning at the local level, the NPF states that future planning and development will need to:

*“Tackle Ireland’s higher than average carbon-intensity per capita and enable a national transition to a competitive low carbon, climate resilient and environmentally sustainable economy by 2050, through harnessing our country’s prodigious renewable energy potential.”*

A key focus throughout the NPF is the fostering of a transition toward a low carbon, climate-resilient society. In this regard, one of the stated key elements of the NPF is an Ireland which has a secure and sustainable renewable energy supply and facilitates the ability to diversify and adapt to new energy technologies. Key features identified in the NPF to facilitate the transition towards a low carbon energy future include:

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

Relevant to the subject development, the **National Strategic Outcome 8** (*Transition to Sustainable Energy*), notes that in creating Ireland’s future energy landscape, new energy systems and transmission grids will be necessary to enable a more distributed energy generation which connects established and emerging energy sources, i.e. renewables, to major sources of demand. The successful transition to a low-carbon power system will depend on the pillars of 1) *Sustainability*, 2) *Security of supply* and 3) *Competitiveness*. A common theme underpinning these pillars is the need for a fit-for-purpose transmission and distribution energy network. Specifically, the NPF states that reinforcement of the distribution and transmission network to facilitate planned growth and distribution of a more renewables focused source of energy across the major demand centres, e.g. the functional purpose of the extant grid connection. Ireland’s national energy policy under **Objective 55** aims 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 NPF aims to ensure that decisions that are made today meet our future needs in a sustainable manner.

*“The manner in which we plan is important for the sustainability of our environment. Our planning system has influence across a wide range of sectors, both directly and indirectly and interacts with many common issues related to effective environmental management, including water services, landscape, flood risk planning, protection of designated sites and species, coastal and marine management, climate mitigation and adaptation, and land use change.”*

An overarching objective of the NPF is to foster a transition toward a low carbon, climate-resilient society, which reflects the policy ethos established at the European level of governance (e.g. climate change and renewable energy targets – Section 2.1). In this regard, one of the key themes of the NPF is the realisation of an Ireland which has a secure and sustainable renewable energy supply and the ability to diversify and adapt to new energy technologies. The NPF references the National Climate Policy Position (superseded by the then CAP 2019) which established the fundamental objective of achieving transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050. The NPF emphasises that rural areas have a strong role to play in securing a sustainable renewable energy supply for the country and acknowledges that *“rural areas have significantly contributed to the energy needs of the country and continue to do so”*. In this regard, the NPF states:

*“In meeting the challenge of transitioning to a low carbon economy, the location of future national renewable energy generation will, for the most part, need to be accommodated on large tracts of land that are located in a rural setting, while also continuing to protect the integrity of the environment”.*

The NPF acknowledges that greenhouse gas emissions from the energy sector must be reduced by at least 80% by 2050 when compared to 1990 levels while ensuring a secure supply of energy exists. New energy systems and the maintenance / safeguarding of existing grid assets will be necessary for a more distributed, renewables focused energy system required to harness Ireland’s considerable indigenous energy sources and *“connect the richest sources of that energy to the major sources of demand”*.

### 2.2.1.2 National Development Plan 2021 – 2030

The National Development Plan 2021 – 2030 (NDP) was published on the 4<sup>th</sup> October 2021 and sets out the major public investment projects identified by Government which are to play a significant role in addressing the opportunities and challenges faced by Ireland over the coming years such as Covid-19, Brexit, housing, health, population growth, and most relevant to the subject development, climate change. It is stated that the NDP 2021 – 2030 will be the *‘largest and greenest ever delivered in Ireland’*, and in this regard, the NDP highlights that extensive consultation was undertaken to ensure that the plan adequately supports the implementation of climate action measures. Reflecting on the recent publication of the IPCC’s 6<sup>th</sup> Assessment Report, the NDP notes that the Irish Government is fully committed to ‘playing its part’ to ensure that the worst climate change damage can be avoided, e.g. significant reductions in CO<sub>2</sub> and other greenhouse gas emissions as assisted by the achievement of both European and National renewable energy targets. Specifically, the NDP states that,

*“The next 10 years are critical if we are to address the climate crisis and ensure a safe and bright future for the planet, and all of us on it.*

*The investment priorities included in this chapter [Ch. 13] must be delivered to meet the targets set out in the current and future Climate Action Plans, and to achieve our climate objectives. The investment priorities represent a decisive shift towards the achievement of a decarbonised society, demonstrating the Government’s unequivocal commitment to securing a carbon neutral future.”*

Notwithstanding this, the NDP acknowledges that it is not its role to set out a specific blueprint for the achievement of Ireland’s climate targets; but as noted above, facilitate capital investment allocations for the climate and environmental strategic priorities.

One of the NDP's strategic climate priorities is the need for low-carbon, resilient electricity systems; specifically, the plan commits to increasing the share of renewable electricity up to 80% by 2030. This is characterised by the NDP as an '*unprecedented commitment to the decarbonisation of electricity supplies*' which, if compared to the extant CAP 2019 and the objective to meet 70% renewable energy share by 2030, is certainly ambitious and an explicit driver for the deployment of new renewable generators and the safeguarding / maintenance of existing assets, e.g. the subject development. It is noted that the reliability of electricity supplies will also be strengthened through investment in the electricity transmission and distribution grid. The focus of investment in regulated network infrastructure is to contribute to a long-term, sustainable and competitive energy future for Ireland.

## 2.2.2

### Regional Policy

The strategic objectives of the NPF are implemented at a regional level by the Northern and Western Regional Assembly's Regional Spatial and Economic Strategy (RSES) 2020-2032. The RSES provides a 12-year strategy to "*deliver the transformational change that is necessary to achieve the objectives and vision of the Assembly.*"

The RSES sets out ten **Strategic Outcomes**, number 8 of which includes:

*"Transition to low carbon and climate resilient society - The National Climate Policy Position establishes the national objective of achieving a transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050. This objective will shape investment choices over the coming decades. New energy systems and transmission grids will be necessary for a more distributed, renewables focused energy generation system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy to the major sources of demand."*

**Growth ambition 1** of the RSES relates to the economy and employment, noting that "*energy is needed for economic growth...decarbonisation can and needs to happen and it is an objective of the NPF that Ireland becomes a Low Carbon Economy by 2050. This reflects the Government's 2014 National Policy Position on Climate Action and Low Carbon Development and is also a binding EU requirement.*"

It is further noted that "*It is important that our region sets out its ambitions concerning renewable energy in this context and shows its ability to help contribute to achieving national targets.*"

The RSES recognises that the region has "*huge potential for growth in renewables, with its diverse and growing environmental goods and services sector, and not least because of the proactivity and drive with which it embraces this agenda.*" With that in mind three specific Regional Policy Objectives (RPOs) are considered particularly relevant to the Proposed Development:

#### Regional Policy Objective RPO 4.17

*"To position the region to avail of the emerging global market in renewable energy by:*

- Stimulating the development and deployment of the most advantageous renewable energy systems
- Supporting research and innovation
- Encouraging skills development and transferability
- Raising awareness and public understanding of renewable energy and encourage market opportunities for the renewable energy industry to promote the development and growth of renewable energy businesses
- Encourage the development of the transmission and distribution grids to facilitate the development of renewable energy projects and the effective utilisation of the energy generated from renewable sources having regard to the future potential of the region over the lifetime of the Strategy and beyond."

#### Regional Policy Objective RPO 4.18

*“Support the development of secure, reliable and safe supplies of renewable energy, to maximise their value, maintain the inward investment, support indigenous industry and create jobs.”*

### Regional Policy Objective RPO 5.2

- “(a) Protect manage and conserve the quality, character and distinctiveness of our Landscapes and seascapes.
- (b) The Assembly supports co-operation and co-ordination between Local Authorities in determining landscape character along their borders. A targeted review should be undertaken to ensure consistency in classification and policy in adjoining areas of similar character. The NWRA will assist in collaboration and coordination.
- (c) Following the completion of the National Landscape Character Assessment, and any associated statutory Guidelines, the Regional Assembly shall prepare a Regional Landscape Character Assessment to promote improved landscape management and designation”

## 2.2.3 Local Policy

### 2.2.3.1 Adopted Roscommon County Development Plan 2022-2028

Roscommon County Council has recently concluded their development plan review process, with the newly adopted Development Plan covering the period 2022-2028 coming into force on the 19<sup>th</sup> of April 2022.

The main body of the Plan is divided into two volumes, volume 1 being the written statement and volume 2 being the plans and maps. There are a range of associated documents also forming part of the Plan, including a dedicated Renewable Energy Strategy (RES).

Chapter 1 of the Plan notes that *“In particular, the Plan has been prepared against the critical need to address climate change and while Chapter 8 focuses on this in depth, it forms a critical consideration across all aspects of the Plan, with a range of actions and policy positions expressed across all aspects of the Plan in order to give expression at local level to climate action. Other cross cutting themes emanating from climate action considerations and evident throughout the Plan include placemaking, regeneration, the creation of sustainable communities, and green infrastructure provision.”*

The RES has the stated primary aim to *“ensure that County Roscommon continues to address climate change through facilitating appropriately located renewable energy developments and through supporting energy efficiency in all sectors of the economy.”*

Amongst the stated strategic aims for the Plan area are:

#### Strategic Aim No. 1:

*“Achieve a transition to a competitive, greener, low carbon, climate resilient and environmentally sustainable county, facilitated through reducing the need to travel, by integrating land use and sustainable modes of transport, by reducing the use of non-renewable resources and by promoting and facilitating renewal energy initiatives on a domestic and commercial scale.”*

Section 5.7 of Chapter 5: Rural Development and Natural Resources is particularly relevant to the Proposed Development. It acknowledges that *“rural areas have the potential to be harnessed for*

*renewable energy projects, including wind, hydro and solar energy.*” Chapter 8 of the Plan, Climate Action, Energy and Environment, discusses renewable energy in more detail.

Section 8.3 of Chapter 8 outlines the strategic vision for climate action in Roscommon. It aims to *“successfully implement a more sustainable and energy efficient approach to how we live, work and socialise will significantly contribute to tackling global warming”*.

In relation to climate action, energy and environment policy the Plan includes the following policy objectives:

**CAEE 8.1:**

*“Support European and national objectives for climate action, adaptation and mitigation which address land use planning, energy, sustainable mobility, flood risk management and drainage as detailed in the Climate Action Plan (2019), the National Climate Change Adaptation Framework (2018) and The Planning System and Flood Risk Management Guidelines (2009) and any subsequent versions of any of the aforementioned.”*

**CAEE 8.2:**

*“Support the National Climate Change Strategy by actively seeking to implement the policy objectives throughout this Plan which contribute to positive climate actions, including those related to renewable energy, sustainable transport, air quality, flooding and the promotion of urban and rural green initiatives.”*

The following policy objectives with regards electricity generation are set out in the Plan:

**CAEE 8.3**

*“Support developments and actions that assist in achieving the national targets for energy from renewable energy, from renewable resources and reducing greenhouse gas emissions associated with energy production.”*

**CAEE 8.4**

*“Encourage and facilitate the various forms of renewable energy development detailed in the Renewable Energy Strategy that accompanies this Plan (as well as any other new forms of renewable energy which may be developed during the lifetime of this Plan), subject to satisfying the principles of proper planning and sustainable development.”*

**CAEE 8.5**

*“Facilitate wind energy developments primarily in areas designated in the Renewable Energy Strategy as “Most Favoured” and secondarily in areas designated as ‘Less Favoured’ in the Renewable Energy Strategy, subject to normal planning criteria and having regard to the Wind Energy Guidelines (DECLG, 2006) and any update to the Guidelines that may issue during the lifetime of this Plan. This will include consideration of carbon benefit analysis, as appropriate.”*

**CAEE 8.7**

*“Ensure that proposals for renewable energy developments are considered in the context of relevant EU and national legislation, including in respect of environmental protection. No renewable energy developments will be considered in designated Natura 2000 sites or their surrounding buffer areas.”*

**CAEE 8.8**



*“Ensure that renewable energy developments do not undermine the preservation and conservation of the natural and built environment and that an appropriate balance is achieved between renewable energy development and preservation of the natural environment.”*

#### **CAEE 8.9**

*“Work in collaboration with EirGrid and other service providers and statutory bodies to facilitate a modern electricity network within the county, including the ‘North Connacht Project’, in line with recognised best practice. The Council will require comprehensive studies to be undertaken for all technical and environmental considerations, to inform the assessment of proposed transmission routes.”*

#### **CAEE 8.12**

*“Facilitate renewable energy proposals that bring about a direct socio-economic benefit to the local community.”*

### **Renewable Energy Strategy**

The Renewable Energy Strategy (RES) forms an individual section of the Plan. Within the RES, it is noted that *“The primary aim of the Strategy is to ensure that the county continues to address climate change through facilitating appropriately located renewable energy developments and through supporting energy efficiency in all sectors of the economy.”*

The RES *“sets out the framework for the delivery of sustainable and renewable energies throughout the county.”* Through the RES the Council has set out its commitment to *“implementing the strategic aims set out in the RES, to ensure that Roscommon delivers upon its commitment to tackle climate change, through facilitating appropriate renewable energy development proposals in the county.”*

The RES sets out the following relevant strategic aims, incorporated where appropriate as Policy Objectives in Chapter 8 of the Development Plan:

#### **RES AIM 1**

*“Provide a framework for renewable energy development within the county through the adoption and implementation of this Strategy.”*

#### **RES AIM 2**

*“Assist in achieving the national targets for energy from renewable energy, from renewable resources and reducing greenhouse gas emissions associated with energy production.”*

#### **RES AIM 3**

*“Encourage and facilitate the various forms of renewable energy development explored in this Strategy, provided they are in accordance with the principles of proper planning and sustainable development. Wind energy developments will be permitted in areas designated as ‘Most Favoured’ primarily, subject to normal planning practices.”*

#### **RES AIM 4**

*“Encourage energy efficient designs and integration of renewable energy components into new and existing developments.”*

#### RES AIM 5

*“Ensure that renewable energy developments do not undermine the preservation and conservation of the natural and built environment and that an appropriate balance is achieved between development and preservation of the natural environment.”*

#### RES AIM 6

*“Comply with relevant EU and National legislation regarding renewable energy development and environmental protection. No renewable energy developments will be considered on Natura 2000 sites or their surrounding buffer areas.”*

#### RES AIM 7

*“Encourage and facilitate the provision of strategic infrastructure in appropriate areas of the county, in order to facilitate the provision and potential exportation of renewable energy.”*

#### RES AIM 8

*“Work in collaboration with EirGrid and other service providers and statutory bodies to facilitate a modern electricity network within the county, in line with recognised best practice. The Council will require comprehensive studies to be undertaken for all technical and environmental considerations, to inform the assessment of proposed transmission routes.”*

#### RES AIM 9

*“Encourage and facilitate research and development proposals for renewable energies in accordance with the principles of proper planning and sustainable development.”*

#### RES AIM 10

*“Support the development of facilities within the county dedicated to the exploration and advancement of renewable energy technologies. Such facilities could assist in expanding public awareness of the sustainable benefits of renewable energy, provide training, research and development facilities for renewable energy.”*

#### RES AIM 11

*“Facilitate renewable energy proposals that bring about a direct socio-economic benefit to the local community.”*

Section 3 of the RES discusses the renewable energy resources and potential in the county, noting that *“at present there is 112 MW of renewable energy being generated in County Roscommon, with the potential for 262MW to be produced.”* If the Proposed Development were to receive a grant of permission, the development would double the current capacity and contribute to County Roscommon’s renewable energy targets.

Potential locations for new renewable energy developments have been informed by an updated Landscape Character Assessment for the county (discussed further below). As set out in Section 6 of the RES, renewable energy developments were considered from a planning perspective involving the assessment of:

- Ecological and Natural Heritage;
- Biodiversity;
- Peatlands;
- Water Resources;

- Archaeology and Built Heritage;
- Landscape Value;
- Infrastructure Constraints.

These considerations have been comprehensively assessed as part of the siting, internal configuration of the turbines for and development of the design of the Proposed Development, as is illustrated in this EIAR.

The conclusions reached in relation to each of the key issues for consideration above, is that it would be in accordance with the proper planning and sustainable development of the area for the Proposed Development to be granted planning permission. Following this analysis and consideration, areas within the county have been designated as being “Most Favoured”, “Less Favoured” and “Not Favoured” for wind energy development potential, the definitions as included in the RES are set out in Table 2-1 below for ease.

Table 2-1 – Wind Energy Zone Descriptions

Designation	Description
<b>Most Favoured</b>	Wind farm development will be considered favourably, subject to compliance with all necessary siting and design standards.
<b>Less Favoured</b>	Wind farm development will be considered, but the sensitivities revealed in these areas would render exploitation more problematic and therefore these areas are less favoured for wind energy development.
<b>Not Favoured</b>	Wind farm development will not be considered favourably in these areas.

In arriving at these designations “*constraints and resources were identified, and areas suitable for wind energy development were identified based on the presence or absence of these. This approach enables a structured and consistent identification of viable wind energy resources and ensures the protection of the environmental and landscape assets of the county from inappropriate development. The sieve analysis process has been aided by the SEAI LARES web tool.*”

Figure 7 of the RES illustrates the ‘Areas Suitable for Wind Development’, the relevant extract of which including the proposed turbines is shown overleaf in Figure 2-2. The majority of the wind turbines and associated works are located in an area deemed ‘Most Favoured’ with 4 no. wind turbines located in ‘Not Favoured’ area.

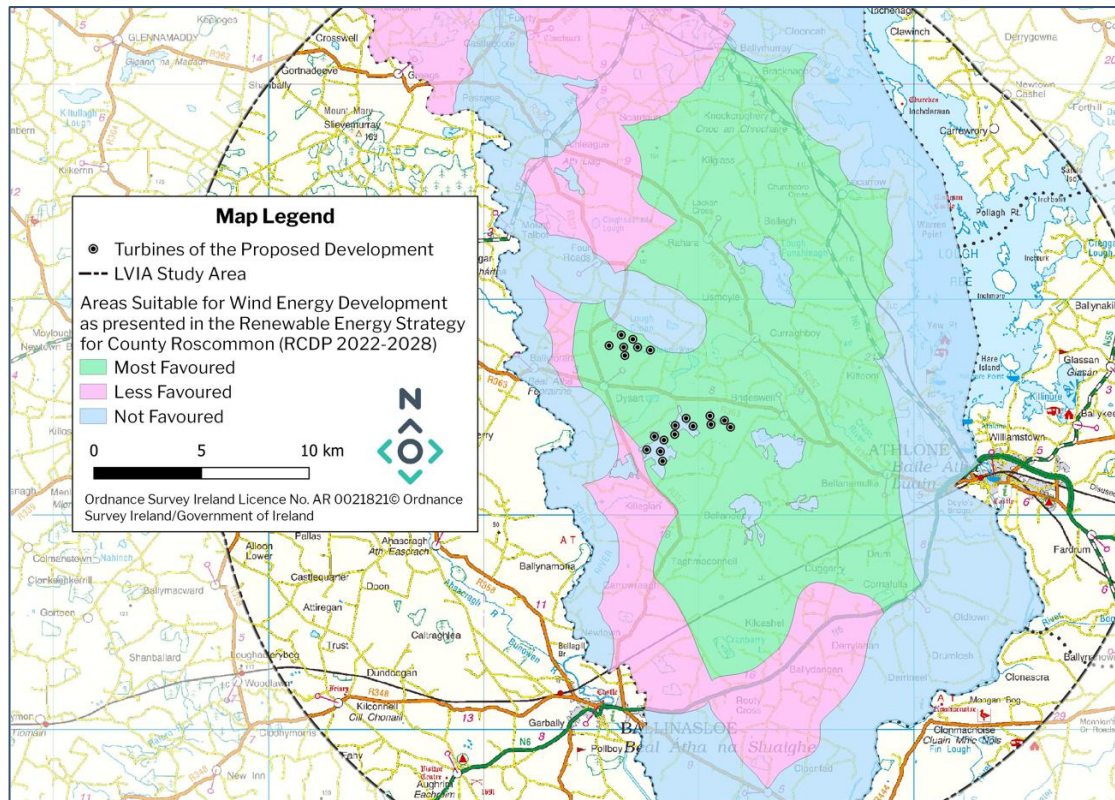


Figure 2-2: Wind Energy Areas – Roscommon County Development Plan 2022-2028

Figure 7 (Map 7) of the Plan RES illustrates that the majority (16 no.) of the proposed turbines and infrastructure is located in an area deemed “**Most Favoured**” for wind energy development. Thus, the Council have already concluded that, through an informed assessment process, the area where the majority of the Proposed Development is located is an area which it has identified as the “**Most Favoured**” for wind energy development. The 4 no. wind turbines located in a ‘Not Favoured’ area were previously in an area deemed ‘**Most Favoured**’ in the previous Roscommon County Development Plan 2014-2020. The change in this area came about during the preparation of the new Plan. During consideration of the proposed Material Alterations to the Draft Plan, the Proposed Amendment MA177 on Map 7 identified the area as the Killeglan Karst Landscape, however no reasoning or scientific evidence was provided for this alteration when debated at the Special Council Meeting prior to the Plan’s adoption, or on final adoption of the Plan. The matter of karst landscapes is discussed in full detail at Chapter 9 of this EIAR.

## Landscape Character Assessment

Similarly, to the RES discussed above, a Landscape Character Assessment (LCA) has been prepared as part of Development Plan. The LCA sets out the methodology used to inform the assessment and applies four levels of landscape value as follows:

- Expectational value
- Very high value
- High value
- Moderate value

The LCA adds that “*Those landscapes of Exceptional Value tend to be generally sensitive to forces of change and as such there may be a need for a more restrictive approach to development in such areas. Landscapes of Moderate Value, on the other hand, tend to be less sensitive and are therefore more tolerant of change.*”

With specific regard to renewable energy developments, wind energy development is considered to be *“the renewable energy type which has the most significant impact on the landscape when developed. Wind data studies indicate that large areas of County Roscommon meet technical requirements for the development of wind turbine sites.”*

Landscape values are illustrated in Figure 8 of the LCA. The Proposed Development site is located within LCA 34 - *Lough Funshinagh, Stone Wall Grasslands and Esker Ridges* landscape character area and an area of ‘Moderate Value’ in landscape terms. Each LCA is then assessed in detail in the Assessment. For the LCA 34 – *Lough Funshinagh, Stone Wall Grasslands and Esker Ridges*, the Assessment describes it as:

*“This LCA is located south of the centre of County Roscommon and is one of the largest areas identified in the study. The landform rolls from north to south and is primarily dry grassland farmland.*

*There is an area of low lying dry grassland in the south where eskers run in a northeast to southwest direction and make a significant contribution towards the overall character and quality of the landscape. Lough Funshinagh is the main landscape feature in the north east. Stone walls evolved as the system of enclosure throughout this area and in places the field sizes are particularly small contributing significantly to the landscape character and sense of place. There are no major settlements in this area. The area is served by the local road network.*

*The overall image of this LCA is of a rolling stonewalled grassland landscape with a distinctive esker area to the south.”*

Landscape Value in this LCA is described as:

*“This landscape is of **Moderate Value**. There are several locations where views are provided from local roads overlooking Lough Funshinagh. Lough Funshinagh is designated as a Special Area of Conservation and so is not just of aesthetic interest but also of high ecological quality. The other features of value in this landscape character area are the eskers highlighted in the description above. They are a reminder of our glacial history and in some places hazel wood cover creates a strong aesthetic and ecological interest.”*

Forces of Change in this LCA are described as:

*“There has been evidence of demand for single rural dwellings on the high ground overlooking Lough Funshinagh. The impact of built development is significant in some instances and undermines the visual quality of the landscape. Houses in the esker belt can sometimes also create an adverse landscape impact as they may require the full or partial removal of the gravelly ridges. Demand for quarried stone and gravel is likely to continue.”*

The LCA within which the Proposed Development site is located has a landscape of ‘**Moderate Value**’, which is the lowest sensitivity classified throughout the County. The Proposed Development area is located within a single LCA, Type 34 Stone Wall Grasslands and Esker Ridges (Lough Funshinagh). This LCA comprises rectilinear fields with stone walls dating back to the 18th to 19th century where the materials used to enclose the fields are stone and some smaller areas of hedgerows dating from the 19th to 20th century where the field are reclaimed raised bog. The landscape character type for the area is classified as Dry Farmland. The landform rolls from north to south and is primarily dry grassland farmland. There is an area of low-lying dry grassland in the south where eskers are found. Lough Funshinagh is the main landscape feature to the northeast.

Associated Natural Heritage Policy Objectives of the Development Plan in relation to landscape include:



#### NH 10.25

*“Minimise visual impacts on areas categorised within the County Roscommon Landscape Character Assessment including “moderate value”, “high value”, “very high value” and with special emphasis on areas classified as “exceptional value” and where deemed necessary, require the use of Visual Impact Assessment where Proposed Development may have significant effect on such designated areas.”*

#### NH 10.26

*“Protect important views and prospects in the rural landscape and visual linkage between established landmarks, landscape features and views in urban areas.”*

### Conclusion on Compliance with the Development Plan

It is the case that the majority of the Proposed Development is located in an area deemed ‘**Most Favoured**’ for wind energy development in the adopted County Roscommon Development Plan 2022-2028. The remaining 4no. turbines are located in an area deemed ‘**Not Favoured**’ for wind energy development. The applicant however disputes the rationale which led to the change in zoning from the previously adopted Development Plan 2014-2020. The entirety of the Proposed Development has been designed as an iterative process which takes account of the constraints which exist on the site. The decision to remove part of this previously favourably zoned wind energy area on the basis of the Killeglan Springs Karst Landscape is not supported by any scientific evidence and as such, the provision of 4 no. wind turbines in this location is considered wholly appropriate.

As the majority of the Proposed Development site is located in an area ‘Most Favoured’ for wind energy, having sufficient wind resources and access to the national grid, this location is therefore considered to be optimal for the provision of wind energy development of the scale and nature proposed. The 4 no. turbines which are now, under the most recent Development Plan, located in an area **Not Favoured** for wind development is not supported by any clear rationale or justification within the adopted Plan and following assessment of the location of turbines in this location, as evidenced in this EIAR, it is held that development in this location can take place.

The designation of such ‘**Most Favoured**’ areas for wind energy development were the subject of thorough and rigorous analysis process under the Development Plan process. This is very evident where the Council’s LCA confirms that “*wind data studies indicate that large areas of County Roscommon meet technical requirements for the development of wind turbine sites.*”. The identification and delineation of the ‘**Most Favoured**’ policy area followed a methodical and logical process, intending to direct wind energy developments towards the most appropriate locations and discourage wind energy development from inappropriate and more sensitive locations within the County. The same cannot be said for the portion of previously-zoned **Most Favoured** lands removed at the Proposed Material Alterations phase of the most recent Development Plan.

#### 2.2.4

### Other Relevant Material Considerations

#### DoEHLG Wind Energy Guidelines 2006

In June 2006, the then Department of Environment, Heritage and Local Government (DoEHLG) published ‘*Wind Energy Development Guidelines for Planning Authorities*’ (the Guidelines) under Section 28 of the Planning and Development Act, 2000. The aim of these guidelines was to assist the proper planning of wind power projects in appropriate locations around Ireland. The Guidelines highlight general considerations in the assessment of all planning applications for wind energy. They set out advice to planning authorities on planning for wind energy through the development plan process and in determining applications for planning permission. They contain guidelines to ensure consistency



of approach throughout the country in the identification of suitable locations for wind energy development.

Each wind project has its own characteristics and defining features, and it is therefore impossible to write specifications for universal use. Guidelines should be applied practically and do not replace existing national energy, environmental and planning policy. While the 2006 Guidelines remain the relevant guidelines in place, at the time of lodgement, decision makers (Planning Authorities and An Bord Pleanála) are not bound to apply their provisions and they can (and do) consider updated standards/requirements/specifications in assessing impacts and the proper planning and sustainable development of the area.

### DoHPCLG Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change 2017

In July 2017, the (then) Department of Housing, Planning, Community and Local Government (DoHPCLG) published '*Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change*' under Section 28 of the Planning and Development Act 2000. Planning authorities are obliged to have regard to guidelines issued pursuant to Section 28 in the performance of their functions under the Planning and Development Act 2000 (as amended).

The guidelines state that it is a specific planning policy requirement under Section 28(1C) of the Act, that in making a development plan with policies or objectives that relate to wind energy developments that a Planning Authority must:

- *“Ensure that overall national policy on renewable energy as contained in documents such as the Government’s ‘White Paper on Energy Policy - Ireland’s Transition to a Low Carbon Future’, as well as the ‘National Renewable Energy Action Plan’, the ‘Strategy for Renewable Energy’ and the ‘National Mitigation Plan’, is acknowledged and documented in the relevant development plan or local area plan;*
- *Indicate how the implementation of the relevant development plan or local area plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts); and*
- *Demonstrate detailed compliance with item number (2) above in any proposal by them to introduce or vary a mandatory setback distance or distances for wind turbines from specified land uses or classes of land use into their development plan or local area plan. Such a proposal shall be subject to environmental assessment requirements, for example under the SEA and Habitats Directives. It shall also be a material consideration in SEA, when taking into account likely significant effects on climatic factors, in addition to other factors such as landscape and air, if a mandatory setback or variation to a mandatory setback proposed by a planning authority in a development plan or local area plan would create a significant limitation or constraint on renewable energy projects, including wind turbines, within the administrative area of the plan.”*

### Department Circular PL5/2017

On the 3rd of August 2017, the (then) Department of Housing, Planning and Local Government issued Circular PL5/2017 to provide an update on the review of the wind energy and renewable policies in development plans, and the advice contained within a previous Departmental Circular PL20-13. Circular PL20-13 advised that local authorities should defer amending their existing Development Plan policies in relation to wind energy and renewable energy generally as part of either the normal cyclical six-yearly review or plan variation processes and should instead operate their existing development plan policies and objectives until the completion of a focused review of the Wind Energy Development

Guidelines 2006. The new circular (PL05/2017) reconfirms that this continues to be the advice of the Department.

The Department circular also sets out the four key aspects of the *preferred draft approach* being developed to address the key aspects of the review of the 2006 Wind Energy guidelines as follows:

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

### IWEA Best Practice Guidelines for the Irish Wind Energy Industry 2012

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

### IWEA Best Practice Principles in Community Engagement and Community Commitment 2013

IWEA extended its guidance with the publication of this Best Practice in Community Engagement and Commitment. IWEA and its members support the provision of financial contributions by wind farm operators to local communities and have sought to formulate best practice principles for the provision of a community commitment. The document sets out IWEA's best practice principles for delivering extended benefits to local communities for wind farm developments of 5 Megawatts (MW) or above. Best Practice Principles of community engagement when planning the engagement strategy and preparing associated literature are also outlined in the document. The aim of these guidelines is to ensure that the views of local communities are taken into account at all stages of a development and that local communities can share in the benefits.

The applicant has engaged in consultations with the population in the direct vicinity of the Proposed Development through letter drops to the local community. A dedicated community liaison officer has also been appointed to the project with the general public being provided with various contact details (including email address and phone number) to facilitate any queries which may arise. In the light of the various Covid-19 restrictions which have been implemented by the government of Ireland over 2020 and 2021 the applicants have been unable to facilitate door to door call outs and public events as initially planned for, however, the applicants have made an effort to provide meaningful engagement as outlined.

Further details on the community engagement that has been undertaken as part of the Proposed Development are presented in Section 2.5 below.

In December 2016, the (then) Department of Communications, Climate Action and Environment (DCCAE) issued a Code of Practice for wind energy development in relation to community engagement. The Code of Good Practice is intended to ensure that wind energy development in Ireland is undertaken in adherence with the best industry practices, and with the full engagement of local communities. Community engagement is required through the different stages of a project, from the initial scoping, feasibility and concept stages, right through construction to the operational phase. The methods of engagement should reflect the nature of the project and the potential level of impact that it could have on a community. The guidelines advise that ignoring or poorly managing community concerns can have long-term negative impacts on a community's economic, environmental or social situation. Not involving communities in the project development process has the potential to impose costly time and financial delays for projects or prevent the realisation of projects in their entirety. Community engagement in relation to the Proposed Development is discussed in full in Section 2.5 below.

### Commission for Regulation of Utilities: Grid Connection Policy

The Commission for Regulation of Utilities (CRU) (previously the Commission for Energy Regulation (CER)) launched a new grid connection policy in March 2018 for renewable and other generators, known as ECP-1, which seeks to allow “*shovel ready*” projects that already have a valid planning permission, connect to the electricity networks. The principal objective which guides this decision is to allow those projects to have an opportunity to connect to the network, along with laying the foundations for future, more regular batches for connection. August 2018 saw the applicants for new connection capacity under ECP-1 published. ECP-2 was launched in June of 2020, with ECP-2.1 applications submitted in September 2020. ECP-2.2 applications were due in September 2021 and ECP-2.3 applications are scheduled for September 2022.

The enduring connection policy regime replaces the previous ‘Gate’ system of grid connection applications. The grid connection application window under ECP-1 was the first time since 2007 that certain renewable energy projects including wind farms had an opportunity to secure a new grid connection offer.

With the ECP2 ruleset now published and with a timeline set for the next rounds of applications there is a clear pathway for the Project to secure a grid connection in a timely manner, subject to receipt of planning permission.

### Renewable Energy Support Scheme (RESS)

The Climate Action Plan 2021, is the Government’s plan to give Irish people a cleaner, safer and more sustainable future to halve emissions by 2030 and reach net zero no later than 2050. The Plan sets out actions across every sector which will ensure we meet our future climate commitments. A key part of the Plan is to achieve at least 70% of electricity demand from renewable sources and to increase the share of electricity demand generated from renewable sources to up to 80% by 2030. These measures will be driven by introduction of the Renewable Electricity Support Scheme (‘RESS’) which aims to promote the generation of electricity from renewable sources.

The RESS is an auction-based scheme which invites renewable electricity projects to bid for capacity and receive a guaranteed price for the electricity they generate.

The Auction Scheme and the ECP framework has now been established and is operational and will facilitate and provide a pathway to realise Ireland’s ambition of up to 80% renewable electricity by 2030, and an EU-wide renewable energy target of 32% by that date also.

## 2.2.4.2 Draft Guidelines

### DoEHLG Wind Energy Guidelines 2006 (Revisions)

Further to information set out in Section 2.2.4 in relation to the 2006 Wind Energy Guidelines it should be acknowledged that the (then) Department of the Environment, Community and Local Government published proposed revisions to the guidelines in December 2013 as part of a targeted review relating to Noise, Proximity and Shadow Flicker for discussion. Revisions to the Wind Energy Guidelines continue to be considered and draft revisions were published in December 2019, these are further discussed below.

### Draft Revised Wind Energy Development Guidelines, December 2019

The (then) Department of Housing, Planning and Local Government published the *Draft Wind Energy Guidelines* (referred to as the Draft Revised Guidelines) in December 2019 and these Draft Guidelines were under public consultation until 19<sup>th</sup> February 2020. Following the previous 2013 consultation and subsequent detailed engagement between the relevant Government Departments, a “preferred draft approach” to inform and advance the conclusion of the review of the 2006 guidelines was announced in June 2017.

In line with the previously stated “*preferred draft approach*”, the 2019 Draft Guidelines primarily focus on addressing a number of key aspects including, but not limited to:

- Acceptable noise thresholds and monitoring frameworks;
- Visual amenity setback and spacing;
- Control of shadow flicker;
- Compliance with Community consultation and dividend requirements, as included within the obligatory Community Report; and
- Consideration of the siting, route and design of the proposed grid connection as part of the whole project.

The design of the proposed project has taken account of the “preferred draft approach” as articulated by the Department in June 2017, and accordingly, has been developed with the provisions of the current Draft guidelines in mind.

Similar to the 2006 Guidelines, the Draft Revised Guidelines also state that underground grid connections for wind energy projects are considered the most appropriate environmental and/or engineering solution (e.g. default approach), particularly in sensitive landscapes. The EIAR is cognisant of the Draft Revised Wind Energy Development Guidelines and will address each key matter (e.g. noise and shadow flicker standards) in turn within the relevant sections of this EIAR. As demonstrated in the subsequent chapters, the Proposed Development will not result in any likely significant effects on the receiving environment. In relation to the Shadow Flicker, the Proposed Development can satisfy the draft guidelines requirement as this is an operational matter that can be controlled by the SCADA system if necessary. In relation to the noise elements of the Draft Guidelines, it is this section that has given rise to the most scrutiny from industry experts who have sought significant amendments and clarifications. While the outcome of the public engagement process on the Draft Revised Guidelines is not yet known, the operational noise parameters can be controlled using the SCADA system, and therefore, the Slieveacurry renewable energy development will ultimately comply with future guidelines should they be adopted/finalised during the consideration period of the current application.

There is, at the time of writing, no timeframe associated with the formalisation of the Revised Guidelines.

## 2.3

# Planning History

This Section of the EIAR sets out the relevant planning history of the Proposed Development site, planning applications in the vicinity of the site and other wind energy applications within the wider area. The period adopted for the purposes of this search is from 2016 – 2021, adopting the approach that any development permitted prior to that period has been constructed and forms part of the baseline. For the purposes of reviewing and stating the relevant planning history for this project the following criteria have been adopted in relation to the various elements of the Proposed Development:

1. All planning applications which overlap or are within the red line planning application boundary of the current Proposed Development have been identified (listed in Table 2-2 below).
2. A buffer zone of 20 kilometres was established from the redline application boundary of the Proposed Development in order to identify other wind farm sites in the wider area. For the purposes of this EIAR the planning history was extended to this wide range for wind farm developments due to the nature of the projects, potential for visual and cumulative affects to arise with the Proposed Development as identified in Chapter 12: Landscape and Visual Assessment. (Table 2-3)
3. Non-wind energy related planning applications within 2km of the turbine infrastructure are set out in Table 2-4 overleaf. The planning history covers the period from 2016-2021, based on the assumption that any permitted development prior to that date has been constructed and therefore forms part of the baseline.
4. Finally, planning applications within a 200m distance of the proposed Grid Connection route are set out overleaf. As the underground electrical cabling of the Proposed Development has limited scope for cumulative impacts to arise given its localised nature. For the cable route localised impacts arise from construction period only as all other activities continue once it is in place. (Table 2-5)

## 2.3.1

# Applications Within the Proposed Development Site

Planning applications which are recorded as being within the application redline boundary are set out in Table 2-2 below.

Table 2-2: Applications Within the Proposed Development Site

Pl.Ref.	Description	Decision
05/687	For (a) To retain imported fill deposited on my lands and (b) Permission to use my lands to take imported fill including gravel, building rubble and topsoil to a depth of 1.2m.	Granted by RCC, 28/04/2006
06/2231	For a slatted shed and all associated works	Granted by RCC, 04/05/2007
09/98	For the erection of a temporary (3 years) 60 metre high anemometer mast and associated site works for the purpose of monitoring and recording wind speed and wind characteristics	Granted by RCC, 21/07/2009
09/165	For the erection of a temporary (3 years) 60 metre high anemometer mast and associated site works for the purpose of monitoring and recording wind speed and wind characteristics	Granted by RCC on the 21/07/2009
10/541	The erection of 14 <sup>8</sup> no. wind turbines each with a hub height of 85m and rotor diameter of 100m, with an overall	Granted by RCC 04/10/2011, Third

<sup>8</sup> The development applied for was for 16 no. wind turbines however this was reduced to 14 no. wind turbines via condition no.4 imposed by An Bord Pleanála whereby turbines 7 and 12 were omitted.

	height of 135m; all associated site development works including 2 no. temporary site compound areas, a permanent anemometer mast 85m in height, foundations, crane hardstandings, access tracks, underground cabling, site entrance off the R357; the construction of a 38kV switch room and control facility (85.5sq.m) with associated equipment and compound area enclosed by a 2.4m high palisade fence; change of use of existing residential dwelling (99.9sq.m) to office use associated with the wind farm. The application is accompanied by an Environmental Impact Statement EIS at (Application made 16 no. wind turbines)	Party Appeal (Ref: 20.239759) to ABP – Permission Granted by ABP 09/09/2013; Subsequent Judicial Review and re-assessment by ABP (ref: PL20.244346) and Refusal of planning permission 28/02/2017.
11/170	Upgrading the existing septic tank to include a 1m <sup>3</sup> chamber, percolation area and all associated development	Granted by RCC, 12/09/2011
11/273	The erection of 19 no wind turbines each with a hub height of 85m and rotor diameter of 100m with an overall height of 135m; all associated site development works including 3no. temporary site compound areas; a permanent anemometer mast 85m in height; foundations; crane hardstandings; access tracks; underground cabling; avian monitoring system; 110kv substation consisting of; substation building with a floor area of 221.4sq.m and substation compound with all associated equipment enclosed by a 2.4m high palisade fence; site entrance off the L7535; and proposed road works to include the upgrading and widening of the L7535 with associated works to access the site. The application is accompanied by an Environmental Impact Statement (EIS).	Granted by RCC 17/08/2012; Third Party Appeal (Ref: 20.241069) to ABP – Permission Granted by ABP 13/09/2013; Subsequent Judicial Review and re-assessment by ABP (Ref: PL20.244347) and Refusal of planning permission 28/02/2017.
21/274	Erection of a temporary meteorological mast - the development will consist of: The erection of a guy-wired lattice meteorological mast of up to 100 metres in height; Associated works, services and foundations area, planning permission is sought for a period of 5 years	Pending – Further Information Requested
21/275	Erection of temporary meteorological mast - the development will consist of: The erection of a guy - wired lattice meteorological mast of up to 100 metres in height; Associated works, services and foundations area, planning permission is sought for a period of 5 years	Pending – Further Information Requested
22/27	Permission to construct a 30-metre-high multi-user lattice tower telecommunications structure with headframe, carrying antenna and dishes enclosed within a 2.4 metre high palisade fence compound with associated ground equipment and associated site works including new access track	Decision due from RCC by 20/03/2022

### Planning Application History Summary

As set out above, a project was previously proposed on the subject site over 10 years ago. It was initially granted two separate planning permissions but was ultimately refused permission. The full detail pertaining to the previous planning applications on the site is set out in the Planning Report which accompanies the planning application. It is stressed to the Board that this planning application represents a new planning application on the site and does not seek to build upon the previous planning applications.



A planning application (Pl. Ref: 10/541) was lodged with the Planning Authority on the 15th October 2010 for 'Phase 1' of a wind farm on land to the north of the village of Dysart. Permission was sought for the erection of 16 no. wind turbines with a hub height of 85 metres, rotor diameter of 100 metres with an overall height of 135 metres; all associated site development works including 2 no. temporary site compound areas, a permanent anemometer mast 85 metres in height, foundations, crane hardstandings, access tracks, underground cabling, site entrance off R357; construction of a 38kV switchroom and control facility with associated equipment and compound area enclosed by a 2.4 metre high palisade fence; change of use of existing residential dwellings to office use associated with the wind farm. The Proposed Development was located in the townlands of Cronin, Gortaphauill, Glenrevagh (ED Turrock), Mullaghardagh, Tullyneeny and Turrock, Dysart, County Roscommon. The application was granted planning permission by the Planning Authority on the 4<sup>th</sup> October 2011 subject to 33 no. planning conditions.

A planning application for Phase 2 of that the project was lodged with the Planning Authority on 14th July 2011 (Pl. Ref: 11/273). The Phase 2 site lies to the south of the R363, 4km east of the village of Dysart. Permission was sought for construction of wind farm comprising of 19 no. wind turbines each with an 85 metre hub height, rotor diameter of 100 metres, and an overall height of 135 metres; ancillary site works including three temporary site compound areas, permanent anemometer mast 85 metres in height, foundations, crane hardstandings, access tracks, underground cabling, avian monitoring system, 110kV substation, site entrance off the L7535 and proposed road works to include upgrading and widening of the L7535. The Proposed Development was located in the townlands of Boleyduff, Cam, Cloonacaltry, Cuilleenoolagh, Feacle, Milltown, Skeavally, Tawnagh and Tobermaccloughlin, County Roscommon. The planning application was granted planning permission by the Planning Authority on the 17<sup>th</sup> August 2012 subject to 30 no. planning conditions.

Both planning applications were subject to third-party planning appeals to An Bord Pleanála (ABP ref: PL20.239759 and PL20.241069, respectively). With regards the Phase 1 appeal, the Board granted planning permission on the 9th September 2013 for 14 no. wind turbines (reduced from 16) and ancillary infrastructure subject to 29 no. conditions (ABP Ref: PL20.239759). The Board also granted planning permission for the Phase 2 appeal (Ref: PL20.241069) on the 13th September 2013 subject to 25 no. conditions.

Both decisions issued by An Bord Pleanála were subsequently judicially reviewed, and it was concluded by the courts that the Board had not lawfully conducted an Appropriate Assessment in accordance with Article 6(3) of the Habitats Directive for either Phase 1 or Phase 2 of the development, and accordingly did not have jurisdiction to grant planning permission for either development. As a result, both projects were remitted back to An Bord Pleanála for assessment. The subsequent reassessments took place under ABP references PL20.244346 (Phase 1) and PL20.244347 (Phase 2). The Board ultimately refused planning permission for both applications on the 28<sup>th</sup> February 2017.

Please refer to the accompanying Planning Report for more detail on the history of these planning applications.

The Proposed Development has taken due consideration of the matters raised during the course of the previous planning applications, appeals, and legal challenges. This EIAR provides detailed technical assessments which consider and address in a full and comprehensive manner, the reasons for refusal issued on the previous two planning applications for the site. In summary it addresses:

- Hydrology and Hydrogeology
- Ornithology
- Precautionary Principle

Chapter 1 of this EIAR provides more detail on each of the above items.

A Planning Report has been prepared and forms part of the planning application documentation. The report justifies the rationale as to why planning permission should ultimately be granted for the Proposed Development.

### 2.3.2 Wind Energy Applications Within 20km Application Boundary

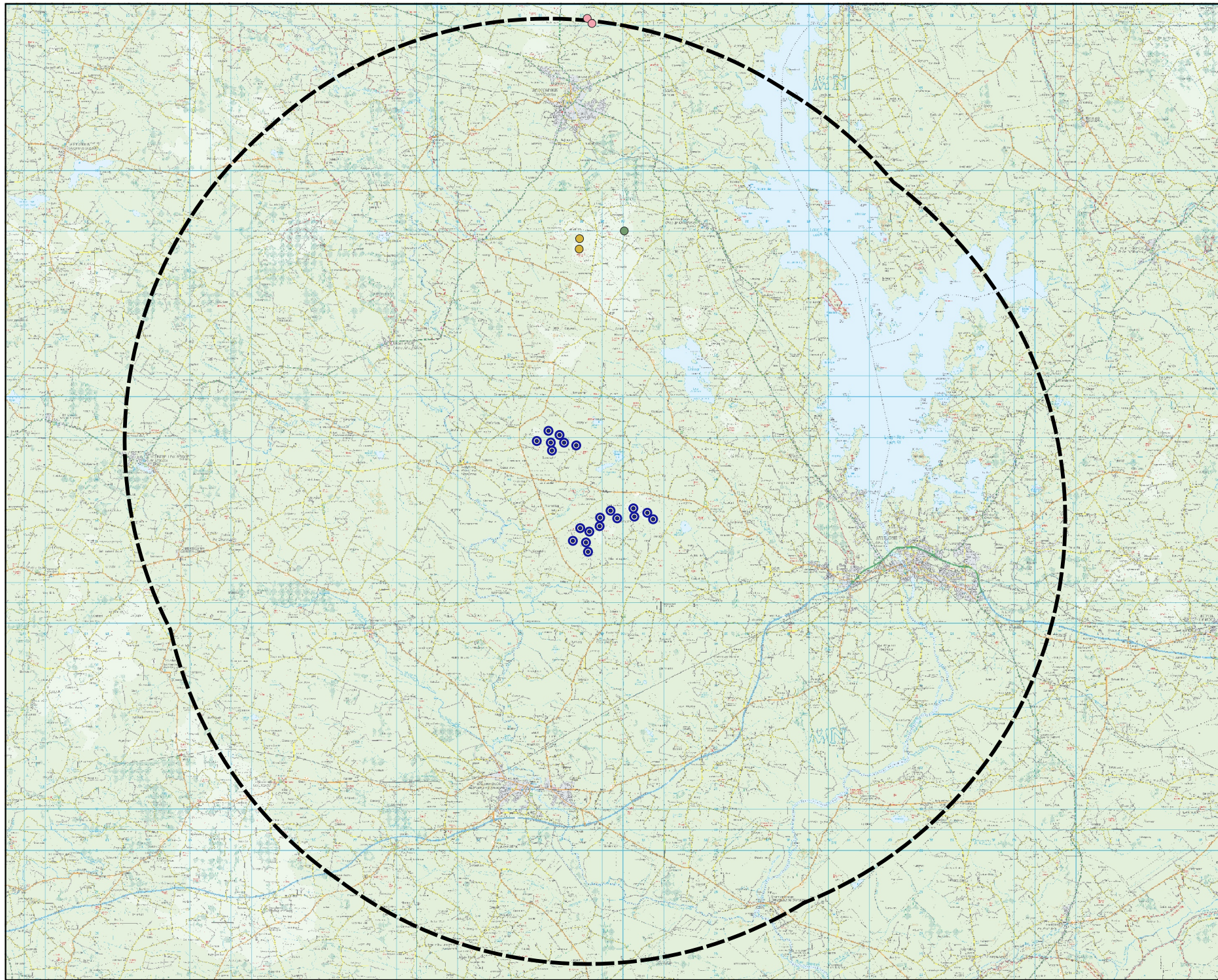
Relevant planning history of potential cumulative wind energy projects are considered to be those within 20km of the Proposed Development, those that have not been listed previously in Table 2-1 (above) are listed in Table 2-3. The wind farm development applications listed below are shown in Figure 2-3.

Table 2-3: Wind Energy Applications Within 20km Application Boundary






Pl.Ref	Description	Decision
<b>Skrine Wind Farm (Approx 8.5km to the north of the subject site)</b>		
04/103	For 3 wind turbine generators, one meteorological tower, one substation and substation compound and associated site access roads.	Granted by RCC Granted by An Bord Pleanála (Ref: 208733) 20/01/2005 2 turbines constructed
10/3002	Application for extension of duration re PD/04/103, For 3 wind turbine generators, one meteorological tower, one substation and substation compound and associated site access roads	Granted by RCC 24/02/2010
<b>Derrane Wind Farm (approx. 20km north of the subject site)</b>		
11/126	Erect two number 2.3MW wind turbines, of up to 85 metre hub height and up to 82 metre rotor diameter with a total height not exceeding 126 metres, associated site works to include new internal site tracks, upgrading existing site tracks, turbine hardstands, control sub station, and cabling works	Granted by RCC 03/01/2012
18/313	Minor technical amendments to the development permitted under Reference 11/126 to provide for the relocation and redesign of the permitted control substation; the construction and re-alignment of internal site access tracks; redesign of permitted hardstand areas; re-alignment of cabling works; minor upgrade works to permitted site entrance; and all associated site development and reinstatement works	Granted by RCC 28/09/2018
18/447	Minor amendments to the development permitted under Roscommon County Council Planning Register References 11/126 and 18/313 to provide for the relocation of the permitted wind turbines and associated infrastructure (site roads and crane hard-standings); amendments to the turbine dimensions to allow for a maximum overall tip height of up to 150 metres and all associated site development and reinstatement works.	Refused by RCC Granted by An Bord Pleanála (303677) 12/07/2019
20/145	For development consisting of minor amendments to the development permitted under Roscommon County Council Planning Register Reference 18/313 to provide for (i) the relocation of the permitted control substation approximately 810 metres to the north, (ii) omission of access track and underground electrical cabling associated with the permitted control substation, (iii) installation of approximately 530 metres of underground electrical	Granted by RCC Granted by An Bord Pleanála (307726) 12/11/2020 Not yet constructed

Pl.Ref	Description	Decision
	cabling to connect the proposed control substation to permitted wind turbine T1 and (iv) all associated site development access and reinstatement works at	
21/3007	Extension of duration for 11/126.	Granted by RCC 12/04/2021
<b>Kilcass Wind Farm (Approx. 10.3km north of the subject site)</b>		
21/221	Construction of one 4.2 MW wind turbine with overall tip height of up to 150m including on-site 20kV substation and underground electrical cable; All associated site development and ancillary works.	Refused by RCC 20/01/2021; Appealed to An Bord Pleanála (ref: 312748-22), Pending





## Map Legend

-  Proposed Development Turbine Layout
-  20km Buffer of Turbines
-  Existing Skrine Wind Farm
-  Proposed Kilcash Turbine
-  Permitted Derrane Wind Farm



Drawing Title

Other Wind Farms within 20km  
of Proposed Development

Project Title

Seven Hills Wind Farm, Co.  
Roscommon

Drawn By

DN

Checked By

OM

Project No.

190907

Drawing No.

Figure 2-3

Scale

1:240000

Date

31.05.2022



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### 2.3.3

## Applications in the Vicinity of the Turbine Infrastructure

There have been a number of planning applications (i.e., non-wind farm applications) lodged 2km of the Proposed Developments turbine infrastructure. The approach taken considers any permitted development identified prior to 2016 to be constructed, and therefore forms part of the baseline. In general, the planning applications identified following a review of the Roscommon County Council planning portal are for the development of housing, and agriculture and community facilities with a reference to some quarrying activities. The applications identified within 2km of the location of proposed turbine infrastructure can be below at Table 2-4.

Table 2-4: Applications in the Vicinity of the Turbine Infrastructure

Pl. Ref:	Description	Decision
16/41	Development of a new dwelling house with proprietary effluent treatment system and soil polishing filter, new road entrance and all ancillary site works	Granted by RCC 03/05/2016
16/43	To erect dwelling house and to construct septic tank and percolation area	Granted by RCC 03/05/2016
16/104	To construct a four bay slatted cattle shed and a four bay calving shed on his lands	Granted by RCC 01/06/2016
16/251	To construct dwellinghouse, domestic garage and install waste water treatment unit with polishing filter	Granted by RCC 02/09/2016
16/476	For erection of dwelling house and domestic garage with sewerage treatment plant and percolation area and associated site development works	Granted by RCC 12/05/2017
17/63	To carry out alterations/extend dwelling house	Granted by RCC 08/05/2017
17/106	For a new dwelling, domestic garage, proprietary effluent treatment system and soil polishing filter, new road entrance, and all associated ancillary site development works	Granted by RCC 04/09/2017
17/136	To construct a dwelling house and install a waste water treatment unit with polishing filter	Granted by RCC 27/06/2017
17/211	To construct a dwelling house, domestic garage and septic tank with percolation area and all associated site works	Granted by RCC 19/09/2017
17/294	Development consisting of extension to rear and to side of existing dwelling house and carrying out all ancillary site works	Refused by RCC 11/08/2017
17/397	To construct a private dwelling house, a domestic garage and sewerage treatment system with all other site services	Granted by RCC 11/04/2018
18/166	Planning permission to erect extension/carry out alterations to dwelling house and to construct ancillary site works	Granted by RCC 02/11/2018
17/397	To construct a private dwelling house, a domestic garage and sewerage treatment system with all other site services	Granted by RCC 11/04/2018
17/420	The development will consist of a new dwelling house, garage, entrance, proprietary effluent treatment system and soil polishing filter, connection to services and all ancillary site works	Granted by RCC 01/10/2018
18/329	To construct a dwelling house, domestic garage and single dwelling treatment system with percolation area and associated site works	Granted by RCC 12/11/2018
18/407	To construct a slatted shed to include concrete apron and all associated works	Granted by RCC 05/11/2018

Pl. Ref:	Description	Decision
18/496	Deletion of Condition No. 17 of previously granted planning permission reference PD/02/578	Granted by RCC 03/12/2018
18/631	To erect a domestic garage/fuel shed and to construct ancillary site works	Granted by RCC 19/03/2019
19/4	Retention to erect extensions to the side and rear of dwelling house and to retain domestic garage/fuel shed	Granted by RCC 09/04/2019
19/43	Development consisting of the following:- (1) Slatted shed; (2) Silage base; (3) Sheep shed; (4) Retain existing loose shed together with all associated site works	Granted by RCC 08/05/2019
19/71	For development consisting of a 2 storey dwelling, sewage treatment plant, percolation area, new site entrance, new garage with associated site works	Granted by RCC 15/05/2019
19/77	For erection of dwelling house and domestic garage with sewerage treatment plant and percolation area, and ancillary site development works	Granted by RCC 04/06/2019
19/85	To demolish derelict dwelling and outbuildings and construct new part single storey/part two storey dwelling, detached domestic garage, use and upgrade existing entrance, effluent treatment system, percolation area and associated site works	Granted by RCC 15/05/2019
19/451	For development consisting of a bungalow dwelling, septic tank, percolation area and new entrance	Granted by RCC 10/12/2019
19/632	Permission to construct a five bay double slatted sheep shed on lands	Granted by RCC 12/03/2020
20/1	Permission for proposed agricultural shed, a new site entrance, retention of garage, retention of relocation of septic tank percolation area as per Planning Permission previously granted under Ref. No. PD/04/81 and all associated works.	Granted by RCC 22/12/2020
20/117	To construct dwelling house, domestic garage and install waste water treatment unit with polishing filter	Granted by RCC 14/08/2020
20/139	Retention for domestic garage and fuel storage shed constructed on site and all associated site works	Granted by RCC 14/08/2020
20/276	To construct dwelling house, domestic garage, treatment system and all ancillary site development works	Granted by RCC 26/01/2021
20/323	To construct a four bay single loose cattle shed and dungstead on lands.	Granted by RCC 27/10/2020
20/364	For development which will consist of a new dwelling, garage, gated entrance, wastewater treatment system and polishing filter and all ancillary site works	Granted by RCC 11/02/2021
20/398	For the construction of a single storey dwelling house and a domestic garage together with the installation of a waste water treatment system / percolation area and all necessary site services / ancillary siteworks.	Granted by RCC 17/06/2021
20/412	For the construction of a dwelling house, domestic garage, the installation of a sewerage treatment unit and percolation area along with connections to all site services and all other associated site works	Granted by RCC 04/03/2021
20/415	To construct a dwelling house, garage, waste water treatment system & associated siteworks	Granted by RCC 15/01/2021
20/486	For demolition of old dwelling house on site, and for erection of new dwelling house and domestic garage, with septic tank and percolation area and ancillary site development works	Granted by RCC 04/03/2021



Pl. Ref:	Description	Decision
20/516	To erect a dwelling house, a domestic garage, install a secondary waste treatment unit with soil polishing filter and to construct all ancillary site works to facilitate same.	Granted by RCC 18/03/2021
21/42	To construct 5 bay machinery / storage shed together with associated siteworks	Granted by RCC 29/04/2021
21/103	To construct a new residential dwelling and shed	Granted by RCC 11/07/2021
21/237	Permission to construct a dwelling house, garage, waste water treatment system & associated siteworks	Granted by RCC 05/07/2021

#### 2.3.4

## Applications in the Vicinity of the Grid Connection Route

A review of the planning register for any development located within 200m of the approximately 12km underground electrical cable connecting the Proposed Development to the national grid has also been carried out. It is considered that this review of the planning register for the period 2016-2021 has identified all relevant works and/or projects in the vicinity which should be considered within any cumulative study or impacts. Projects permitted prior to this period are considered likely to be constructed therefore form part of the baseline. The results of the planning search are shown in Table 2-5 below. The applications relate in the main to residential dwellings and alterations and amendments to same. There are several applications for multiple residential units and certain commercial developments in the vicinity of populated areas at certain points along the route, such as at the residential area of Bellanamullia and Monksland, and where commercial/business developments exist at Monksland towards the end of the route where it enters the existing Athlone 110kV substation.

Table 2-5: Applications in the Vicinity of the Grid Connection Route

Pl. Ref:	Description	Decision
16/19	Change of use of a takeaway and additional floor space	Granted by RCC 16/03/2016
16/297	Construct an admin building as per Pl Ref 04/1176	Granted by RCC 11/11/2016
16/415	Construct 6 no. houses	Granted by RCC 24/04/2017
17/269	Change of use to the rear of a dwelling	Granted by RCC 31/01/2018
17/420	Construct a dwelling house	Granted by RCC 23/08/2018
17/465	Construct 27 no. dwelling houses	Granted by RCC 29/05/2018
18/197	Change of use of a bookmakers and amendments to Pl Ref 07/1440	Granted by RCC 31/05/2018
18/280	Extension to dwelling house	Granted by RCC 13/07/2018
18/399	Construct a dwelling house	Granted by RCC 19/10/2018
19/63	Construct extension to dwelling house	Granted by RCC 28/03/2019
19/82	Development of a new ground floor lobby	Granted by RCC 05/06/2019
19/283	Change of use of a premises to early learning centre from commercial	Granted by RCC 18/07/2019
19/592	Construct a domestic dwelling	Granted by RCC 17/01/2020

20/421	Retail extension	Granted by RCC 19/01/2021
20/519	Raise the height of side boundary	Granted by RCC 08/02/2021
20/556	Amendments to PI Ref 17/465	Granted by RCC 17/05/2021
21/103	Construct a dwelling house	Granted by RCC 09/07/2021
21/113	Construction of a retail store	Granted by RCC 23/04/2021
21/377	Extension to dwelling house	Granted by RCC 27/08/2021
21/507	Sub division of a retail unit with an additional shop opening	Decision due 02/11/2021

### 2.3.5 Section 5 Declarations/Referrals

Categories of exempted development are set out in the Planning and Development Regulations 2001 as amended. They typically refer to developments of a minor nature, such as small extensions to houses, garden walls etc however in some instances, they can relate to underground electrical cables which are minor in nature. In accordance with Section 5 of the Planning and Development Act 2000 as amended any person may request a declaration as to whether development is exempt. The following Section 5 referrals within 2km of the Proposed Development boundary have been found, for the period 2016 – 2021, inclusive. As Section 5 declarations/referrals are typically minor in nature, it is considered that there is limited scope for cumulative impacts to arise.

#### An Bord Pleanála

No referrals to the Board within the period 2016 – 2021 (inclusive) within a 2km radius of the Proposed Development boundary have been identified.

#### Roscommon County Council

The records held by Roscommon County Council in relation to Section 5 declarations have been reviewed. The following declarations for the period 2016-2021 (inclusive) within a 1km radius of the Proposed Development boundary have been identified:

Table 26: Roscommon County Council Section 5 Declarations

Ref No.	Date Received	Address	Description	Decision Date	Decision
DED250	08/02/2017	Civic Offices, Old Tuam Road, Monksland, Athlone	Extension to existing playground adjacent to Athlone MD Civic Offices	07/03/2017	Exempt Development
DED276	31/08/2017	1 Cushla Grove, Monksland, Athlone, Co. Roscommon	Shed built since 1991	27/09/2017	Not Exempt Development
DED278	06/09/2017	Corrlea Td, Curraghboy, Athlone, Co. Roscommon	To construct a ground floor extension (under 40sqm) to the rear of the existing house- to accommodate a bedroom (wheelchair)	04/10/2017	Exempt Development

Ref No.	Date Received	Address	Description	Decision Date	Decision
DED280	08/11/2017	Eskebane, Brideswell, Athlone	Construction of a loose house to house cattle and a general purpose shed for fodder and machinery and ancillary works (i.e concrete)	07/12/2017	Exempt Development
DED399	17/06/2020	Unit 3, Westpoint Business Park, Monksland, Athlone	On Hold-Letter to applicant sent 10/07/2020 confirmation issued with regard to compliance with condition no.2 PD/04/777. Letter states that the applicant may now wish to withdraw application for DED 399		On Hold
DED484	17/09/2021	Unit D, Daneswell Business Park, Monksland, Athlone,	No works to be carried out, Applying for LEADER funding to purchase small scale equipment for site. Currently carrying out pharmaceutical	14/10/2021	Not Development

## 2.4 Scoping and Consultations

### 2.4.1 Scoping

Scoping is the process of determining the content, depth and extent of topics to be covered in the environmental information to be submitted to a competent authority for projects that are subject to an Environmental Impact Assessment (EIA). This process is conducted by contacting the relevant authorities and Non-Governmental Organisations (NGOs) with interest in the specific aspects of the environment with the potential to be affected by the proposal. These organisations are invited to submit comments on the scope of the EIAR and the specific standards of information they require. Comprehensive and timely scoping helps ensure that the EIAR refers to all relevant aspects of the Proposed Development and its potential effects on the environment and provides initial feedback in the early stages of the project, when alterations are still easily incorporated into the design. In this way scoping not only informs the content and scope of the EIAR, but it also provides a feedback mechanism for the proposal design itself.

A scoping report, providing details of the application site and the Proposed Development, was prepared by McCarthy Keville O'Sullivan Ltd. (MKO) and circulated in August 2020. MKO requested the comments of the relevant personnel/bodies in their respective capacities as consultees with regards to the scope and preparation of the EIAR.

#### 2.4.1.1 Scoping Responses

Table 2-7 lists the responses received from the bodies to the scoping document circulated in August 2020. Copies of all scoping responses received are included in Appendix 2-1 of this EIAR. If further responses are received, the comments of the consultees will be considered in the construction and operation of the Proposed Development in the event of a grant of planning permission. The

recommendations of the consultees have informed the project design and scope of assessments undertaken and the contents of the EIAR.

Table 2-7 Scoping Responses

No.	Consultee	Summary Response
1	An Taisce	No response received to date
2	Bat Conservation Ireland	No response received to date
3	Birdwatch Ireland	Response received 17 <sup>th</sup> August 2020
4	Broadcasting Authority of Ireland	Response received 15 <sup>th</sup> June 2020
5	Commission for Regulation of Utilities, Water and Energy	No response received to date
6	Department of Agriculture, Food and the Marine	Response received 6 <sup>th</sup> April 2021
7	Department of Communications, Climate Action and the Environment	No response received to date
8	Department of Defence	Response received 18 <sup>th</sup> August 2020
9	Department of Culture, Heritage, and the Gaeltacht	Response received 23 <sup>rd</sup> September 2020
10	Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media	No response received to date
11	EirGrid	See telecoms scoping responses
12	Environmental Protection Agency	No response received to date
13	ESB Telecoms	No response received to date
14	Fáilte Ireland	Response received 7 <sup>th</sup> April 2020
15	Geological Survey of Ireland	Response received 8 <sup>th</sup> September 2020
16	Health Service Executive	Response received 17 <sup>th</sup> September 2020
17	Iarnród Éireann	No response received to date
18	Inland Fisheries Ireland	No response received to date
19	Irish Aviation Authority	Response received 7 <sup>th</sup> September 2020
20	Irish Peatland Conservation Council	No response received to date
21	Irish Raptor Study Group	No response received to date
22	Irish Red Grouse Association	No response received to date

No.	Consultee	Summary Response
23	Sports Ireland (formerly Irish Sports Council)	No response received to date
24	Irish Water	Response received 15 <sup>th</sup> September 2020
25	Irish Wildlife Trust	No response received to date
26	Northern & Western Assembly	No response received to date
27	Office of Public Works	No response received to date
28	Shannon IRBD Project	No response received to date
29	Sustainable Energy Authority of Ireland	No response received to date
30	Roscommon County Council	No response received to date
31	Roscommon County Council Heritage Officer	Response received 19 <sup>th</sup> August 2020
32	The Heritage Council	No response received to date
33	Transport Infrastructure Ireland	Response received 21 <sup>st</sup> August 2020
34	TV3	No response received to date

Table 2-9 overleaf presents the key points from the scoping responses and identifies where such points have been addressed in this EIAR.

## 2.4.2 Telecommunications

As part of the early constraints study undertaken in the early design stages, telecommunications bodies were contacted, and the responses set out in Table 2-8 below received. All detailed telecommunications scoping responses are included in Appendix 2-1 of the EIAR.

Table 2-8 Telecommunications Responses

No.	Consultee	Date of response	Response received and further action
1	Airspeed Communications	18 <sup>th</sup> February 2020	No links in the area therefore no potential for adverse impacts to arise.
2	BT Communications Ireland	12 <sup>th</sup> February 2020	No impacts noted therefore no potential for adverse impacts to arise.
3	ESB Telecoms	17 <sup>th</sup> February 2020	No links in the area therefore no potential for adverse impacts to arise.
4	Eir	24 <sup>th</sup> February 2020	One transmission link in the area, 100m buffer maintained.

No.	Consultee	Date of response	Response received and further action
5	Imagine Group	12 <sup>th</sup> February 2020	One transmission link identified in the area, 100m buffer maintained.
6	Ripplecom	15 <sup>th</sup> July 2020	Two links identified in the area, turbines moved and buffers maintained.
7	2rn (RTE Transmission Network)	12 <sup>th</sup> February 2020	One transmission link identified in the area, 100m buffer maintained.
8	Tetra Ireland Communications Ltd.	18 <sup>th</sup> February 2020	No impacts noted therefore no potential for adverse impacts to arise.
9	Three Ireland	12 <sup>th</sup> February 2020	One transmission link identified in the area, 100m buffer maintained.
10	Towercom	12 <sup>th</sup> February 2020	No significant impact anticipated therefore no potential for adverse impacts to arise.
11	Virgin Media	12 <sup>th</sup> February 2020	No links in the area therefore no potential for adverse impacts to arise.
12	Vodafone Ireland	13 <sup>th</sup> February 2020	One radio link identified in the area, 81m buffer added and maintained.
13	ComReg	20 <sup>th</sup> February 2020	No links in the area therefore no potential for adverse impacts to arise.
14	Viatel Ireland Ltd	No Response	N/A
15	EMR	12 <sup>th</sup> February 2020	No links in the area therefore no potential for adverse impacts to arise.
16	Ajisko	13 <sup>th</sup> February 2020	No links in the area therefore no potential for adverse impacts to arise.
17	Arden Broadband Limited	No response	N/A
18	Eircom Ltd	24 <sup>th</sup> February 2020	Responded via Eir (see above).
19	Enet Telecommunications Networks	18 <sup>th</sup> February 2020	No links in the area therefore no potential for adverse impacts to arise.
20	Lighthouse Networks Limited/Lightnet		Two links identified in the area surrounding the site, no impact from the Proposed Development identified.
21	Westmeath Council	No response	N/A





Table 2.9 Review of Scoping Responses

No.	Consultee	Key Scoping Response Points	Addressed in EIAR
1	Birdwatch Ireland	Birdwatch Ireland returned no comment on the Proposed Development	N/A
2	Broadcasting Authority of Ireland	BAI confirmed that they did not have any links in the area and that no issues were foreseen.	N/A
3	Department of Agriculture, Food and the Marine	Noted the regulations around felling and requirements for a felling licence.	Chapter 4 - Description
4	Department of Defence	Acknowledged receipt of the scoping document, did not have any recommendations.	N/A
5	Department of Heritage, Culture and the Gaeltacht	<p>Provided guidance on Survey Methodologies and Assessment Approach, CEMP and post construction monitoring.</p> <p>Highlighted the need to demonstrate that there will not be any consequential impacts on any Natura 2000 site, providing a non-exhaustive list of QI and SCI species to be considered in the NIS and EIAR.</p> <p>DAU also recommended radio telemetry bases surveys in conjunction with VP watches to account for topography and nocturnal movements of swans and geese.</p>	Chapter 6 - Biodiversity
6	Faite Ireland	Sent their general Faite Ireland Guidelines document for EIAR	Chapter 5, Section 5.3
7	Geological Survey of Ireland	<p><b><u>Geoheritage:</u></b></p> <p><b>Killeglan Karst Landscape (Site Code: RO015):</b> this site comprises an extensive area of boundary terrain, within the Proposed Development site, in South Roscommon. GSI stressed the importance and rarity of this landscape within the context of Co. Roscommon.</p> <p><b>Castlesampson Esker (Site Code RO010):</b> this esker is an excellent example of a complex, multi- crested esker which is comprised of numerous beads.</p> <p>GSI stated that:</p> <p>➤ <i>“Ideally, the sites should not be damaged or integrity reduced in any manner due to the Proposed Development. However, this is not always possible and in this situation appropriate mitigation measures should be put in place to minimise and mitigate potential impacts.”</i></p> <p><b><u>Groundwater:</u></b></p>	<p>Chapter 8 – Land, Soils and Geology</p> <p>Chapter 9 – Hydrology and Hydrogeology</p>

No.	Consultee	Key Scoping Response Points	Addressed in EIAR
		<ul style="list-style-type: none"> <li>➤ The Proposed Development is underlain by “Regional Important Aquifer – Karstified (conduit)”. GSI recommends the use of Groundwater viewer to identify areas of High to Extreme Vulnerability.</li> <li>➤ Killeglan Public Water Supply – Tobermore Spring. Design of the windfarm drainage will need to be cognisant of the public water scheme and the interactions between surface water and groundwater as well as run-off. Appropriate design should be undertaken by qualified and competent persons to include mitigation measures as necessary.</li> <li>➤ Recommended to use the GWFlood tools to identify any flood risk areas.</li> </ul> <p><b>Other Comments:</b></p> <ul style="list-style-type: none"> <li>➤ Should any significant bedrock cuttings be created, GSI ask that they will be designed to remain visible rock exposure rather than covered with soil and vegetated, in accordance with safety guidelines and engineer constraints.</li> <li>➤ In areas where natural exposures are few, or deeply weathered, this measure would permit on-going improvement of geological knowledge of the subsurface and could be included as additional sites of the geoheritage dataset, if appropriate. Alternatively, GSI have requested that a digital photographic record of significant new excavations could be provided.</li> </ul>	
8	Health Service Executive	<ul style="list-style-type: none"> <li>➤ The HSE requested that all sensitive receptors in the vicinity of the turbines should be identified, including schools and nursing home in Dysart village. The information on possible future monitoring requirements for the operation of the wind farm should be included in the EIAR.</li> <li>➤ The EIAR should fully describe and consider any alternatives to this project. The applicant should outline a rationale for the site selection and the proposed individual turbine locations and design.</li> <li>➤ A full and thorough noise survey must be carried out to assess the impact from noise from the proposed turbines to residents living in the area. They stressed the importance of the careful selection of noise monitoring locations. The assessment should ensure that noise levels do not exceed the specified limits for such developments. The HSE also stresses the importance of assessing the noise impact cumulatively with other developments that may be in the area.</li> <li>➤ The HSE requested that a shadow flicker assessment was to be carried on the properties surrounding the Proposed Development.</li> </ul>	<p>Chapter 5, Section 5.2.8</p> <p>Chapter 3 – Site Selection and Reasonable Alternatives</p> <p>Chapter 11 – Noise</p>

No.	Consultee	Key Scoping Response Points	Addressed in EIAR
		<p>➤ A current assessment of the ground stability of the site was also requested to be carried out for Proposed Development together with the necessary mitigation measures to be included within the EIAR.</p>	<p>Chapter 5, Section 5.7</p> <p>Chapter 8 – Land, Soils and Geology</p> <p>Chapter 14, Section 14.2</p>
9	Irish Aviation Authority	<p>The authority stated that it had no specific requirement in relation to the development of the EIAR based on the approximate location submitted and will furnish the usual observation during the planning process relating to the construction of the wind farm.</p> <p>IAA pointed out the need for an aeronautical obstacle warning light scheme, as well as 30 days notification in relation to crane operations and submissions of as constructed coordinates accompanied by ground and tip height elevations of each turbine.</p>	
10	Irish Water	<p>Response contained a generic scope of works to be included within the EIAR</p>	N/A
11	Roscommon County Council Heritage Officer	<p>Noted the importance of the Killeglan Karst Landscape in the context of Co. Roscommon, as it the only such area of lowland, boulder strewn, limestone glacial karst in the country. It is of national importance because of this.</p> <p>Also noted the observation on Castlesampson Esker as the esker is one of Ireland's best examples of the 'long beaded' esker type.</p> <p>They acknowledged that MKO have consulted with GSI on this matter, but also stressed that these sites are identified as being of County Geological importance and are given due consideration.</p>	<p>Chapter 8 – Land, Soils and Geology</p> <p>Chapter 9 – Hydrology and Hydrogeology</p>
12	Transport Infrastructure Ireland	<p>Response received policy and guidelines from TII regarding the EIAR and potential effects on road networks, as well as consideration of alternative routes and existing roads that may be used for the provision of cabling in order to minimise the impacts on road networks.</p>	<p>Chapter 14 – Material Assets, Section 14.1</p> <p>Chapter 3, Section 3.6</p>

## 2.5 Other Consultation

### 2.5.1 Pre-Planning Meetings

#### 2.5.2 Roscommon County Council

The prospective applicant and members of the design team met on two occasions with the County Council in relation to the Proposed Development prior to the submission of this planning application.

The first meeting took place on the 21<sup>st</sup> July 2020 via MS Teams and included representatives from the Council's Planning, Roads, Environment, Municipal District (Athlone) and Heritage sections. The team gave a PowerPoint presentation as an introduction to the site and development proposals, including a summary of the Strategic Infrastructure Development (SID) thresholds and criteria noting the application would be made to An Bord Pleanála as SID.

Matters discussed included:

- Planning history of the site, past reasons for refusal
- Supporting policy being located in a 'favoured area' under the extant Development Plan
- Grid connection
- Roads vis a vis cable laying, haulage and drainage
- Drainage including karst features
- Noise
- Ecology
- Heritage
- Consultation

The prospective applicant thanked the Council and noted that second pre-application meeting would be scheduled in due course.

A second pre-application meeting was held on the 20<sup>th</sup> November 2020 with the County Council, again via MS Teams. Representatives from the Council's Planning, Roads and Environment were in attendance.

Matters discussed included:

- Design refinement including the omission of 1no. wind turbine from the Southern Cluster of the development; location of substation and location of turbine access and layout of internal roads.
- Environmental assessments and survey work
- Grid connection
- Roads vis-a-vis cable laying and reinstatement
- Planning policy framework and that emerging in new Development Plan

The Planning Authority assigned reference PP21-118a for the pre-application discussion.

A dedicated meeting with the Roads section of Roscommon County Council also took place on the 8<sup>th</sup> of January 2021. The meeting focused on matters pertaining to:

- The turbine delivery route
- Grid connection process and anticipated connection point
- Substation location within the site

### 2.5.3 An Bord Pleanála

The prospective applicant engaged with An Bord Pleanála under the provisions of SID as the Proposed Development would meet the thresholds of the Seventh Schedule of the Planning and Development Act, 2000, as amended. The prospective applicant opened consultations with the Board in March 2020 with a Proposed Development of 21 no. wind turbines at the Seven Hills site.

A first SID meeting was held with the Board on the 11<sup>th</sup> June 2020. Those in attendance were:

- Ciara Kellett, Assistant Director of Planning (Chair), An Bord Pleanála
- Patricia Callear, Senior Planning Inspector, An Bord Pleanála
- Rob MacGiollarath, Executive Officer, An Bord Pleanála
- Rob Scott, Energia
- Grace Curran, Energia
- Steven Drury, Galetch
- Órla Murphy, MKO
- Meabhann Crowe, MKO

The prospective applicant described the Proposed Development to the Boards representatives with the aid of an on-screen PowerPoint presentation.

The discussion included the following items:

- SID criteria – the Boards representatives stated their general agreement with the prospective applicants view that the Proposed Development reached the threshold for SID
- Two grid connection routes were being considered
- Submission of a single planning application
- Landscape and visual including features
- Hydrology and hydrogeology
- The Wind Energy Guidelines 2006 and ‘Balz’ court case
- Public consultation and Covid-19 impacts
- Stakeholder engagement

A second pre-application consultation meeting was held with the Board on the 16<sup>th</sup> November 2020. The meeting attendees were per the first meeting, save for the Galetch representative.

It was noted to the Boards representatives that through the design refinement process the number of turbines had now reduced to 20 no. turbines (7 no. turbines in the north and 13 in the south). The Proposed Development will include an electricity substation and associated control buildings and plant, borrow pits (to be confirmed pending site investigations), electrical cabling for grid connection etc.

The discussion included the following:

- The prospective applicant confirmed that new sections of turbine access routes would be required and that the constraints review process was ongoing
- It was confirmed that cabling would be laid underground
- A connection to the Athlone 110kV substation in the townland of Monksland (approximately 11.3 km east/southeast of the site) would be required
- Turbine components would be delivered via the M6
- The prospective applicant confirmed that an EIA Scoping Document had been issued and summarised responses to date
- The prospective applicant detailed the public consultation undertaken and planned



- The prospective applicant summarised the EIA survey work and assessments underway. The Board's representatives noted that 'land' should be included in the EIAR as a topic in its own right.
- The Board's representatives highlighted the landscape, residential dwellings in the vicinity of the Proposed Development and the archaeological/cultural heritage in the area.
- The Board's representatives noted the previous judicial review of the previous decisions.
- The Board's representatives drew attention to the emerging WEGs and recent Board decisions in relation to noise.
- The Board's advice was that the entire application could be lodged under section 37 of the Planning and Development Act 2000, as amended, should the Board determine that the project came within the definition of SID.

On the 18<sup>th</sup> June 2021 MKO on behalf of the prospective applicant sought to close the consultation process with An Bord Pleanála. At the time of close out, the following design update was provided to the Board:

- "All turbine locations have now been frozen, being those shared with the Board at the last meeting;
- Access to the land parcels north and south remain from the R363;
- The generation capacity of each of the proposed turbines will remain at circa 5-6MW; accordingly, the total installed capacity of the Proposed Development will remain at approximately 100- 120MW;
- The proposed maximum ground to blade-tip turbine height remains at up to 180m;
- Proposed substation which was shown previously north-east of T19 has been moved slightly to the northwest of T19;
- The grid connection cabling route which will be assessed as part of the EIAR will be located underground connecting the proposed on-site substation and the existing Athlone 110kV substation in the townland of Monkslands which is located approximately 10.5km east/south-east of the site;
- The location of the permanent meteorological mast has been confirmed;
- Turbine components will be delivered to the site via M6 and Regional Roads R362 and R363;
- Further community consultation has taken place since the last meeting with the Board in November 2020. This comprised:
  - 06.11.2020 – Letter issued to all residents who were not contactable pre-Covid restrictions
  - January 2021 – Started advertising in local papers (Roscommon Herald and Westmeath Independent) once monthly advising local consultation was ongoing. A dedicated telephone number and email were attached to this advert
  - 25.01.2021 – Timeline of events updated on dedicated project website
  - 09.02.2021 - Calls to local representatives regarding new FAQs on website and informing them of independent scoping for community groups and the Innovision launch
  - 22.02.2021 – Updated FAQs on website along with how many people contacted since consultation started and what method of contact was used
  - 19.02.2021 - Independent company undertaking scoping exercise for local community groups to assess the needs in the area
  - Continuing monthly newspaper notices
  - Monthly advert in local newspapers from January to June (Roscommon Herald and Westmeath Independent)
  - Freephone number and email was available at all stages
  - The communications team are working on a virtual exhibition and organising a final series of face-to-face clinics for July

On the 1<sup>st</sup> July 2021 An Bord Pleanála served notice that consultations under section 37B of the Planning and Development Act 2000, as amended, that it was their opinion under section 37B(4)(a) that the Proposed Development falls within the scope of paragraphs 37A(2)(a) and (b) of the Act and accordingly, would be Strategic Infrastructure within the meaning of section 37A of the Act. Any application for the Proposed Development therefore must be made directly to An Bord Pleanála. The Board provided a list of prescribed bodies considered relevant for the purposes of Section 37E(c) of the Act as follows:

- Minister for Housing, Local Government and Heritage
- Minister for Culture, Heritage and the Gaeltacht (Development Applications Unit)
- Minister for Agriculture, Food and the Marine
- Minister for Communications, Climate Action and Environment
- Minister for Transport, Tourism and Sport
- Roscommon County Council
- Galway County Council
- Irish Water
- Inland Fisheries Ireland
- Transport Infrastructure Ireland
- Environmental Protection Agency
- The Heritage Council
- An Taisce
- An Chomhairle Ealaíon
- Fáilte Ireland
- Irish Aviation Authority
- Health and Safety Authority
- Office of Public Works

The Board further requested that the prospective applicant should submit a standalone document (which may form part of the EIAR) with the planning application, outlining the mitigation measures. In addition, they advised that drawings and documents, including turbine dimensions, sufficient to describe the nature and extent of the development, be lodged with the application.

## 2.5.4 Community Consultation

The applicant has undertaken significant community consultation and stakeholder engagement, as evidenced by the enclosed Community Consultation and Stakeholder Engagement Report (Appendix 2-2).

Prior to commencing community consultation the applicant undertook a series of internal community consultation workshops to develop a Community Liaison Strategy, involving the project manager, community liaison officers (CLOs) and members of the assigned community engagement team.

The objectives of the community consultation were to:

- Describe the approach to community engagement and stakeholder management for the project;
- Identify how community engagement and stakeholder management issues pertaining to the Proposed Development have been managed to date;
- Identify the main stakeholders, their issues and concerns, influence, and participation levels; and
- Identify key messages used in communicating with stakeholders and the project phases where they are likely to be impacted or interested.

The community consultation process itself included:

- Dedicated project Community Liaison Officer – one-to-one meetings;
- Consultation with local elected representatives;
- Door-to-door visits to local residences and provision of freepost feedback/contact cards;
- Conversations with the local groups, community hall committees and local representatives, where appropriate;
- Project website: [www.sevenhillswindfarm.ie](http://www.sevenhillswindfarm.ie) and virtual exhibition room;
- Public consultation clinics; and
- Freephone call-back service, e-mail and letter, and brochure;
- Print and radio adverts in local media.

Full detail on each of the above is included in the Consultation Report at Section 2.

In relation to consultation with the local community specifically, Section 2.2 of the report details how the website [www.sevenhillswindfarm.ie](http://www.sevenhillswindfarm.ie) went live before any consultation letters were issued or clinics were held. It was therefore the first point of contact for the wider process. The website is updated on a regular basis and the intention is to keep it updated throughout the planning application process.

With regards the impacts of Covid-19 restrictions on the consultation process, it is highlighted to the Board that door-to-door visits initially commenced in February 2020 however these were halted in mid-March 2020 as a result of the restrictions. 300 no. houses were visited during this stage, a leaflet left and contact details for the community engagement team provided. In mid-September 2020 door-to-door visits recommenced. Covid-19 restrictions were subsequently reintroduced which resulted in this being halted again. In October 2020 all residents received a letter updating them on the project and acknowledged that some household visits remained outstanding at that time.

In January 2021 an updated timeline of consultation events was uploaded to the project website. Monthly advertisements were placed in local newspapers also. A virtual exhibition was prepared and ran from June 2021-November 2021. During this period there were 493 visitors to the exhibition.

It is concluded in the Report that the objectives outlined have been achieved and every effort made to identify and engage with key stakeholders in a flexible and facilitative manner. Community engagement will be maintained throughout the project stages, including while the planning application is under consideration and, should the planning permission be granted, the construction, operational and decommissioning phase.

## 2.6

# Cumulative Impact Assessment

The EIA Directive and associated guidance documents state that as well as considering any direct, indirect, secondary, transboundary, short-, medium-, and long-term, permanent and temporary, positive and negative effects of the project (all of which are considered in the various chapters of this EIAR), the description of likely significant effects should include an assessment of cumulative impacts that may arise. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to the project. The factors to be considered in relation to cumulative effects include population and human health, biodiversity, land, soil, water, air, climate, material assets, landscape, and cultural heritage as well as the interactions between these factors.

To gather a comprehensive view of cumulative impacts on these environmental considerations and to inform the EIAR process being undertaken by the consenting authority, each relevant chapter within this EIAR includes a cumulative impact assessment where appropriate.

The potential for cumulative impacts arising from other projects has therefore been fully considered within this EIAR.

## 2.6.1 Methodology for the Cumulative Assessment of Projects

To gather a comprehensive view of cumulative impacts on these above environmental considerations and to inform the EIA process being undertaken by the consenting authority, each relevant chapter within the EIAR addresses the potential for cumulative effects where appropriate.

The potential cumulative impact of the Proposed Development and other relevant developments has been carried out with the purpose of identifying what influence the Proposed Development will have on the surrounding environment when considered cumulatively and in combination with relevant approved, existing and planned projects in the vicinity of the proposed site.

The cumulative impact assessment of projects has three principle aims:

- To establish the range and nature of existing and/or approved projects within the cumulative impact study area of the Proposed Development.
- To summarise the relevant projects which have a potential to create cumulative impacts.
- To identify the projects that hold the potential for cumulative interaction within the context of the Proposed Development and discard projects that will neither directly or indirectly contribute to cumulative impacts.

Assessment material for the cumulative impact assessments carried out within this EIAR was compiled in relation to the relevant developments within the various zones of sensitivity of and to the Proposed Development from which there may be potential for cumulative impacts to arise. The material was gathered through a search of relevant online planning registers, reviews of relevant EIS/EIAR documents, planning application details and planning drawings, and served to identify past and future projects, their activities and their environmental impacts.

## 2.6.2 Projects Considered in Cumulative Assessment

The projects considered in relation to the potential for cumulative impacts and for which all relevant data was reviewed (e.g. individual EIS/EIAR's, layouts, drawings etc) include those listed previously above in Section 2.3 and all relevant associated works. Each individual chapter will assess the Proposed Development in combination with these other projects which have been further detailed below.

### 2.6.2.1 Other Wind Farms

There are 3 no. wind farm developments located in proximity to the proposed Wind Farm:

- Skrine Wind Farm located approx. 8.5km to the north of the subject site, 2 turbines constructed
- Derrane Wind Farm located approx. 20km north of the subject site, Not yet constructed
- Kilcash Wind Farm located approx. 10.3km north of the subject site, currently under consideration by the An Bord Pleanála following refusal by Roscommon County Council

Any cumulative affects arising are considered in the relevant chapters of this EIAR.

### 2.6.2.2 Roadstone Quarry

The Roadstone Quarry at Cam located to the south of the R363 is approximately 100m from the closest infrastructure proposed as part of the Seven Hills Wind Farm development. Works at the quarry will continue throughout the construction and operation of the Proposed Development and any cumulative affects that could potential arise from both projects is considered in the relevant chapters of this EIAR.

### 2.6.2.3 Onsite Masts

#### 2.6.2.3.1 Met Masts

As detailed in Table 2-1, Energia Renewables Ireland Ltd. has applied to Roscommon County Council for the erection of two guy-wired lattice meteorological mast of up to 100 metres in height within the Proposed Development site; one being located in within the townland of Skeavally, the second located within the townland of Cronin; for a period of 5 years. Where relevant, this has been detailed and assessed cumulatively within the EIAR.

#### 2.6.2.3.2 Telecoms Mast

As detailed in Table 2-1, Cellnex have applied for permission to construct a 30-metre-high multi-user lattice tower telecommunications structure within the Proposed Development site. This will likely be operational during the construction of the Proposed Development and has been assessed cumulatively, where relevant, but most specifically within Chapter 14 – Material Assets.

### 2.6.2.4 Other Developments/Land uses

The review of the Roscommon County Council planning register documented relevant general development planning applications in the vicinity of the Proposed Development site, most of which relate to the provision and/or alteration of one-off rural housing and agriculture-related structures, as described in Section 2.3 of Chapter 2. These applications and land uses have also been taken account in describing the baseline environment and in the relevant assessments.

Furthermore, the cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider all potential significant cumulative effects arising from all land uses in the vicinity of the Proposed Development. These include permitted and existing wind farms in the area, and ongoing agricultural practices/forestry practices. The OPW ([www.floodinfo.ie](http://www.floodinfo.ie)) does not record the presence of any Arterial Drainage Schemes or Benefited Lands within the proposed Wind Farm site, along the Grid Connection route or in the surrounding lands. The closest mapped benefited lands are along the Suck River to the west of the Site. This suggests that there has been no requirement to improve these lands for agriculture and/or to mitigate flooding within the site or along the Grid Connection route.

Overall, the Proposed Development has been designed to avoid and mitigate impacts on the environment and a suite of mitigation measures is set out within the EIAR. The mitigation measures set out in this EIAR will ensure that significant cumulative effects do not arise during the construction or operational phases of the Proposed Development. Additional detail in relation to the potential significant cumulative effects arising and, where appropriate, the specific suite of relevant mitigation measures proposed are set out within each of the relevant chapters of this EIAR.