
GORTYRAHILLY WIND DAC

GORTYRAHILLY WIND FARM

CO. CORK

PLANNING STATEMENT

August 2022

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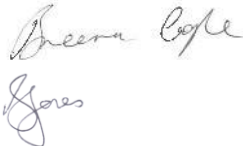


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GORTYRAHILLY WIND DAC**GORTYRAHILLY WIND FARM****PLANNING STATEMENT****CONTENTS**

Executive Summary	1
1.0 Introduction	6
1.1 Proposed Development	6
1.1.1 Purpose and Structure of the Planning Statement	12
2.0 Need for the Development – International and National Policy	13
2.1 The Climate Emergency	13
2.2 International Energy Policy	14
2.3 European Energy Target	15
2.4 National Policy	17
2.4.2 National Energy Security Framework	18
2.4.3 Climate Action and Low Carbon Development Act 2021	19
2.4.4 The Climate Action Plan 2021	20
2.4.5 National Energy and Climate Plan 2021-2030	20
3.0 Regional Energy Policy	22
3.1 Summary of Need for Development	25
4.0 Development Plan Policy Appraisal	26
4.1 Introduction	26
4.2 Cork County Development Plan 2022-2028 Assessment	26
4.3 The Kerry County Development Plan 2022 – 2028	39
4.4 Conclusions	42
5.0 Material Planning Considerations	43
5.1 Introduction	43
5.2 The National Interest and Strategic Importance	43
5.2.1 Sustainable Development and Policy Objectives of the Local Area	45
5.2.2 Implication for European Sites	45
5.2.3 Renewable Energy Policy	45
5.2.4 Key environmental considerations	46
5.3 Land Use and Nature Conservation	48
5.4 The Development as Sustainable Development	48
5.5 Summary of Material Planning Considerations	49

6.0	Conclusion	51
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Tables:

Table 3.1: Key Planning Policy Objectives from the RSES

Table 4.1: Relevant Planning Policies from The Cork County Development Plan 2022-2028

Table 5.1: The Development as Sustainable Development

Figures:

Figure 1.1: Candidate Turbine Dimensional Considerations Elevations

Figure 1.2: Site Location Plan with the Site Outlined in Red

Figure 4.1: Wind Farm Designations (Map Extract Taken from The CCDP 2022-2028; Figure 13.3 – Wind Energy Strategy Map)

Figure 4.2: Kerry Wind Zoning Map (Map Extract Taken from The Draft Kerry County Development Plan 2022-2028, Volume 4, Map5; Wind Zoning

Figure 5.1: Onshore Wind Impacts in Ireland (From The Economic Impact of Onshore Wind in Ireland Figure 1.6)

Statement of Authority

This Planning Statement has been prepared by Breena Coyle, Sarah Jones and David Kiely of Jennings O'Donovan & Partners Limited.

Breena Coyle, Senior Town Planner in Jennings O'Donovan & Partners Limited (JOD), has a Masters in Environment Planning from Queens University and has over 12 years' experience in Environmental Planning throughout Ireland and the UK. She has a clear understanding of the legislative framework and has experience in the development of windfarms from the pre-planning process through to construction.

Sarah Jones is a Graduate Environmental Scientist and Planner and holds a first-class MSc in Environmental Sustainability from University College Dublin and a Bachelor (Hons.) Degree in Geography from Manchester Metropolitan University. Sarah's experience includes EIA screenings, Appropriate Assessment (AA) screenings, planning and environmental reports, environmental impact assessments and construction environmental management plans.

David Kiely, Director of Jennings O'Donovan & Partners Limited, holds a BE in Civil Engineering from University College Dublin and MSc in Environmental Protection from IT Sligo. He is a Fellow of Engineers Ireland, a Chartered Member of the Institution of Civil Engineers (UK) and has over 39 years' experience. He has extensive experience in the preparation of EIAR and EIS for environmental projects including Wind Farms, Solar Farms, Waste Water Projects, Quarries and various commercial developments. David has also been involved in the construction of over 50 wind farms since 1997.

EXECUTIVE SUMMARY

In May 2019 the Irish Parliament declared a "climate emergency". As a response to combat this emergency the Government published The Climate Action Plan 2019 on 17th June 2019. This was subsequently updated in 2021.

The plan states that decisive and urgent action is required to arrest the acceleration of greenhouse gas emissions within the limited window of opportunity that remains. The Plan is ambitious, affecting almost every sector of the economy. The key focus of the Plan is to identify how the Government will reduce Ireland's, still growing, greenhouse gas emissions.

The Gortyrähilly Wind Farm (the Development) will be a momentous and positive contribution toward reversing this situation, allowing the potential benefits of:

- Providing clean, renewable energy
- Contributing to renewable energy targets which will continue to drive down the overall cost of energy with benefits to the Irish consumer
- Creating additional jobs and encouraging continued investment in the renewable industry in Ireland

- Displacing an estimated total of 158,773 tonnes of carbon dioxide over the proposed 35-year lifetime of the wind farm

This Planning Statement accompanies a Planning Application submitted under the provisions of Planning and Development Act 2000 (as amended) Section 37E for the construction of 14 new turbines, grid connection and all associated works relating to the project.

The Gortyrähilly Wind Farm (the Development) is subject to the EIA process as it falls under 'Category 3(i) of the Fifth Schedule Part II of the Planning and Development Regulation, 2001 (SI NO. 600 of 2001)', which sets out a comprehensive list of project types and development thresholds where relevant, which are subject to Environmental Impact Assessment (EIA) for the purposes of the Regulations. The Regulations stipulate that 'Installations for the harnessing of wind power for energy production (wind farms) with more than 5 turbines or having a total output greater than 5 megawatts', requires an EIAR. This Statement has also taken cognisance of the new EIA Directive 2014/52/EU.

In addition, the Development meets the Strategic Infrastructure Development (SID) threshold for wind energy set out in the Seventh Schedule (Class 1) of the Planning and Development Act 2000, as amended i.e., the project will consist of a windfarm with an expected total output greater than 50 Megawatts. Therefore, the Planning Application is being submitted directly to An Bord Pleanála as an SID project in accordance with Section 37E of the Planning and Development Act 2000, as amended.

Ireland's Climate Action Plan 2021 (CAP21) target is to achieve 80% of electricity produced by renewable sources by 2030. By 2020 this figure was at a high of 42%, but dropped to 34.7% in 2021¹. The target for installed wind energy capacity by 2030 is 8.2 GW, in May 2022 this was 4.3 GW², leaving a shortfall of 3.9 GW to be achieved in the next 8 years. The Development would contribute 78.4-92.4 MW of renewable wind energy helping Ireland to achieve these targets, which in the context of the ongoing climate emergency is an urgent Irish national priority that must be given significant weight given the wealth of supporting national and international policy. The Development is also likely to provide a multi-million euro benefit to both the Irish and local economies.

Joint European Action for more affordable, secure and sustainable energy

Following the invasion of Ukraine by Russia, the case for a rapid clean energy transition has never been stronger and clearer. The EU imports 90% of its gas consumption, with Russia providing more than 40% of the EU's total gas consumption. Russia also accounts for 27% of oil imports and 46% of coal imports.

¹ <https://www.epa.ie/our-services/monitoring--assessment/climate-change/ghg/energy/>

² <https://windenergyireland.com/about-wind/facts-stats>

Section 2.2.3 of 'The RePower EU: Joint European Action for more affordable, secure and sustainable energy'³ document published on the 22nd of March 2022 calls for Member States to Enable faster permitting for renewable energy projects and to ensure that renewable energy projects are considered as being in the overriding public interest and in the interest of public safety.

In May 2022, the commission published the "REPowerEU Plan"⁴ which puts forwards a set of actions to:

- Save energy;
- Diversify supplies;
- Quickly substitute fossil fuels by accelerating Europe's clean energy transition;
- Smartly combine investments and reforms.

The RePowerEU plan also includes two proposed amendments to the Renewable Energy Directive⁵;

- Renewable energy plans are presumed to be of 'overriding public interest'
- Increasing the European Union's renewable energy target to 45%.

This target increase and change of wording to the directive underlines the vital nature of investments in to new renewable energy developments such as the Gortyrhilly Wind Farm, which would increase the domestic renewable energy production capacity of Ireland and its contribution to the EU overall target.

In accordance with the REPowerEU Communication, in May 2022 the Commission published a recommendation⁶ including guidance on speeding up permit-granting procedures for renewable energy projects.

The recommendation was created to help Member States exploit all possibilities for acceleration that exist within the legislative framework. It proposes measures to streamline procedures at national level, addresses ambiguities in the application of EU legislation and sets out good practices in Member States.

It includes guidance to Member States that the planning, construction and operation of plants for the production of energy from renewable sources qualify for the most favourable procedure available in their planning and permit-granting procedures and are presumed as being in the **overriding public interest** and in the **interest of public safety**,

National Energy Security Framework

In response to the European Commission's REPowerEU action statement the Government of Ireland issued the National Energy Security Framework⁷ in order to address Ireland's energy security needs

³ https://ec.europa.eu/commission/presscorner/detail/en/IP_22_1511

⁴ https://eur-lex.europa.eu/resource.html?uri=cellar:fc930f14-d7ae-11ec-a95f-01aa75ed71a1.0001.02/DOC_1&format=PDF

⁵ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52022PC0222&from=EN>

⁶ [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=PI_COM:C\(2022\)3219&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=PI_COM:C(2022)3219&from=EN)

⁷ <https://assets.gov.ie/221399/86cb99f5-58e3-4821-bc4c-e1bb1fa706fb.pdf>

in the context of the war in Ukraine. It sets out how Ireland is seeking to phase out dependency on Russian gas, oil and coal imports as soon as possible in order to address the urgent need to secure Irelands energy supply.

It is focused on three areas of work:

- Reducing demand for fossil fuels, which would seek to reduce overall demand for oil, natural gas and coal in Ireland.
- Replacing fossil fuels with renewables, which would seek to reduce the use of gas, oil and coal in Ireland by replacing it with renewable energy sources such as wind energy, solar energy or bioenergy.
- Diversifying fossil fuel supplies, which would seek to replace any Russian supplies of gas, oil and coal (direct or indirect) with supplies from other sources.

The new Irish framework underlines the importance of new renewable energy generation projects, such as Gortyrähilly Wind Farm, in securing Ireland's energy supply in light of the war in Ukraine and resulting energy supply issues.

The National Energy and Climate Plan and the Climate Action Plan

The National Energy and Climate Plan 2021-2030 and the Climate Action Plan 2021 (CAP21) set out a target for 80% electricity to come from renewable sources by 2030. In 2021 this was at 35%⁸ so there is a high demand for new renewable energy sources to achieve this target. Decarbonisation and energy security are also key objectives of both the National Energy and Climate Plan 2021-2030 and CAP21.

The CAP21 sets a target of increasing onshore wind to 8.2 GW by 2030, as of May 2022 this was 4.3 GW⁹, leaving a shortfall of 3.9 GW to be achieved in the next 8 years. The Development would contribute 78.4-92.4 MW of renewable, domestically produced wind energy, helping Ireland to reduce emissions, improve energy security and achieve renewable electricity targets.

Regional Spatial & Economic Strategy

The Regional Spatial & Economic Strategy (RSES) for the Southern Region provides a long-term regional level strategic planning and economic framework, to support the implementation of the National Planning Framework, for the future physical, economic and social development for the Southern Region. One of the key objectives of the RSES is to prioritise action on climate change across all strategic areas and in all economic sectors supported by a robust implementation of time-bound and measurable objectives on climate action for the Southern Region. The RSES recognises and supports onshore wind energy projects as key sources of renewable energy which play an important role in delivering value and clean electricity for Ireland.

⁸ <https://www.epa.ie/our-services/monitoring--assessment/climate-change/ghg/energy-/>

⁹ <https://windenergyireland.com/about-wind/facts-stats>

County Development Plan

It is in an area designated as "Open to Consideration" to wind farm development in the Cork CDP and the closest portion of County Kerry to the Development is also designated as 'Open to Consideration' for wind energy development.

It is in line with the 'Planning Guidelines for Wind Farm Development 2006' and 'Draft Wind Energy Development Guidelines 2019' as per both Development Plan requirements. It is in line with industry best practice and suitable community engagement has formed a key part of the design and planning phase of the Development. It is considered to be fully in compliance with the objectives and policies set out in the in the Cork and Kerry CDPs.

In summary the Development:

- Is in an area designated "Open to Consideration" for Wind Farms in Cork and adjacent to an area designated as "Open to Consideration" in Kerry
- Contributes up to 78.4-92.4 MW of renewable wind energy to the national CAP21 target of 8.2 GW by 2030 helping to reduce the current 3.9 GW shortfall
- Contributes to the 45% overall renewable energy target for the EU introduced by the RePowerEU plan in light of the war in Ukraine
- Contributes to assisting Ireland to increase from 42% electricity produced by renewable sources in 2020 to 80% by 2030 to meet the national target
- In line with the Regional Spatial and Economic Strategy for the southern region's goal of prioritizing action on climate change across all strategic areas and in all economic sectors
- Is in line with the local Cork County Development Plan policy on increasing energy security and promoting renewable energy and contributing to the CDPs goal of increasing onshore wind in the county to 1,100 MW by 2030.
- Meets Cork and Kerry County Development Plans requirements for not having adverse impacts on the surrounding environment, including water quality, landscape, biodiversity or amenities
- Contributes to rural economic development in line with the Cork CDP

Overall, it is considered that the Development is in accordance with international, European and national policy. The Development's contribution of between 78.4-92.4 MW of renewable electricity to renewable energy targets while providing jobs, economic development and the community development fund would result in positive socio-economic impacts on the region, in line with the objectives of the County Development Plan (CDP) at a local level. The Development also meets the CDP requirements for not having adverse requirements on the surrounding environment, including water quality, landscape, biodiversity or amenities.

1.0 **INTRODUCTION**

1.1 **Proposed Development**

Jennings O'Donovan & Partners Limited, Consulting Engineers, have prepared this Planning Statement ("the Statement") on behalf of Gortyrhilly Wind DAC to accompany the application ("the Application") to An Bord Pleanála ("the Board") under Section 37E of the Planning and Development Act 2000, as amended.

The Project will consist of the following main components:

- Construction of 14 No. wind turbines with an overall ground to blade tip height ranging from 179m to 185m inclusive. The wind turbines will have a rotor diameter ranging from 149m to 155m inclusive and a hub height ranging from 102.5m to 110.5m inclusive.
- Construction of permanent turbine hardstands and turbine foundations.
- Construction of one temporary construction compound with associated temporary site offices, parking areas and security fencing.
- Installation of one (35-year life cycle) meteorological mast with a height of 110m and a 4m lightning pole on top.
- Development of two on-site borrow pits.
- Construction of new permanent internal site access roads, upgrade of existing internal site access roads and upgrading of the L-34011-20 road (which forms part of the Beara-Breifne Way) and lies within the site, to include passing bays and all associated drainage infrastructure.
- Development of an internal site drainage network and sediment control systems.
- Construction of 1 no. permanent 110 kV electrical substation including 2 no. control buildings with welfare facilities, all associated electrical plant and equipment, security fencing and gates, all associated underground cabling, wastewater holding tank, and all ancillary structures and works.
- All associated underground electrical and communications cabling connecting the wind turbines to the wind farm substation.
- Ancillary forestry felling to facilitate construction of the development.
- All works associated with the permanent connection of the wind farm to the national electricity grid comprising a 110 kV underground cable in permanent cable ducts from the proposed, permanent, on-site substation, in the townland of Gortyrhilly and onto the townlands of Derree, Derreenaculling, Lumnagh Beg, Lumnagh More, Scrahanagown, Bardinch, Milleeny, Inchamore, Derreenaling, Derryreag, Cummeenavrick, Glashacormick, Clydaghroe and Cummeennabuddoge to the existing Ballyvouskill 220 kV Substation in the townland of Caherdowney.
- All associated site development works including berms, landscaping, and soil excavation.
- Improvement of an entrance to an existing private road off the L-7405-0 local road to include localised widening of the road and creation of a splayed entrance to facilitate the delivery of abnormal loads and turbine component deliveries.

- Improvement of an existing site entrance off the L-3402-36 local road to include removal of existing vegetation for visibility splays to facilitate the use of it for the delivery of construction materials to the site.
- Upgrade works on the turbine delivery route to include the following:
 - Construction of a temporary bridge over the Sullane River to allow access to the L-3400-79 from the N22 in Ballyvourney for the duration of the construction works.
 - Localised widening of the L-3405-0 road to a width of 4.5m, from the junction with the L3400-79 road to the junction with the L-7405-0 road.
 - Localised widening of the L-7405-0 road to a width of 4.5m, from the junction with the L-3405-0 to the entrance to an existing private road off the L-7405-0.
 - The construction of a temporary access road off the N22 in the townland of Cummeenavrick to facilitate a 180 degrees turning manoeuvre by the turbine delivery vehicles.

A 10-year planning permission and 35-year operational life from the date of commissioning of the entire wind farm is being sought. This reflects the lifespan of modern-day turbines.

A permanent planning permission is being sought for the Grid Connection and substation as these will become an asset of the national grid under the management of EirGrid and will remain in place upon decommissioning of the wind farm.



Figure 1.1: Candidate Turbine Dimensional Considerations Elevations

The Site

The Development is located within the located within an agricultural and forested landscape, between Coolea, Reananerree, and Ballyvourney, in Co. Cork. The Site is located 62km west of Cork City, and 34km east of Kenmare, Co. Kerry. See **Figure 1.2**.

The Site extends to approximately 667 ha, of which approximately 154 ha is commercial forest owned by Coillte. The remaining land (approximately 513 ha) is third party property and the principal land use in the general area is comprised of a mix of agricultural sheep and cattle grazing, farmland, residential properties and open mountain heath. Most of the 154ha owned by Coillte comprises different stages of coniferous plantation forestry. The species comprise mainly of Sitka Spruce with small pockets containing Lodgepole Pine, Alder, Birch and Beech.

There are 106 houses within 2km of the proposed turbines. The closest inhabited dwelling (H3) is located 753m from the nearest turbine. There are a cluster of two residential buildings located 225m from T12. In the event that planning consent is achieved, these buildings will be in control of the applicant and will not be inhabited for the operational period. These buildings are uninhabited and the landowner is in agreement with the above terms.

Land Ownership

A portion of the Site is owned by Coillte. However, the majority of the Site is located on lands under the ownership of third-party private landowners who have consented to the application and the Development.

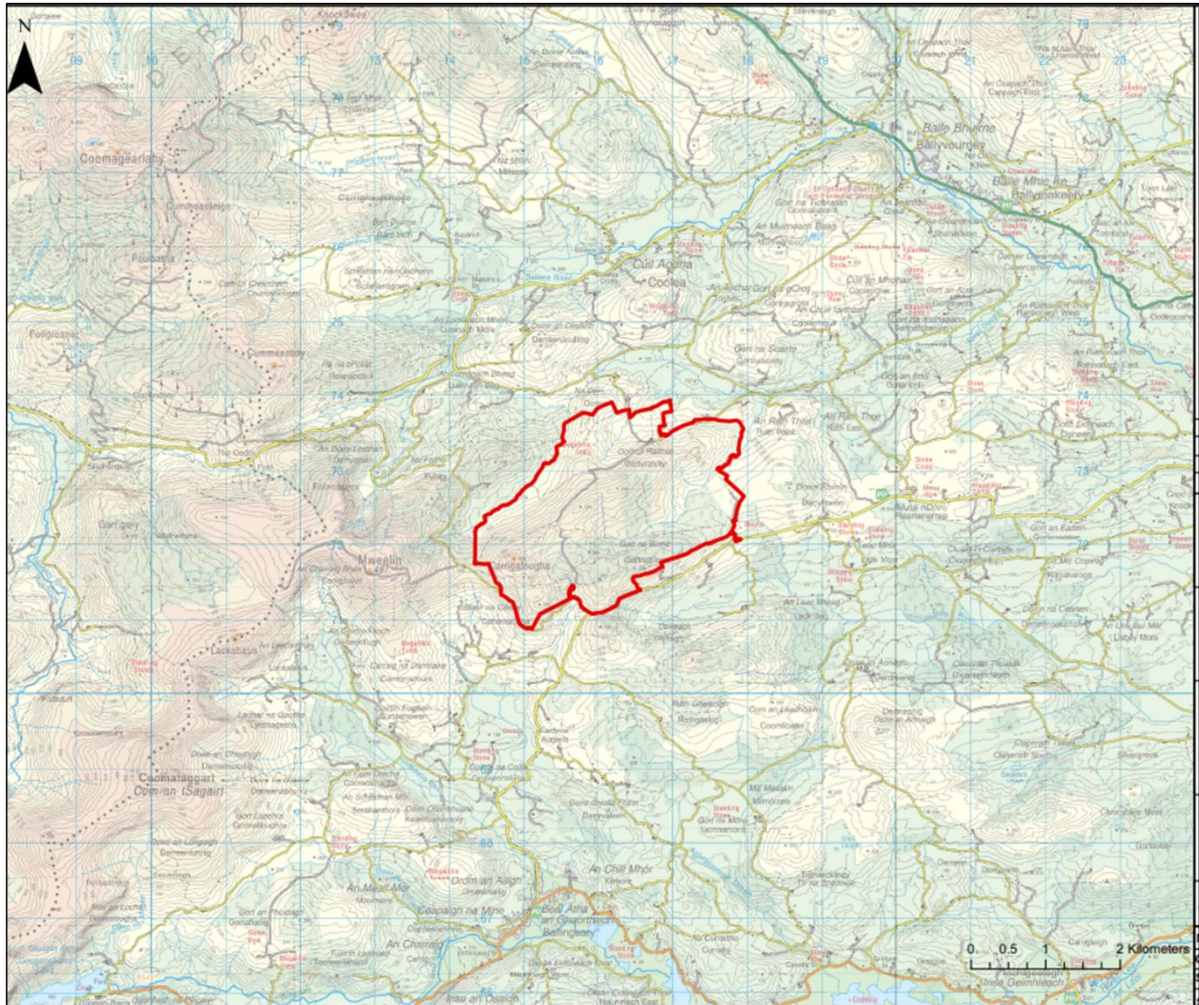


Figure 1.2: Site Location Plan with the Site Outlined in Red

Planning

A 10-year planning permission and 35-year operational life from the date of commissioning of the entire wind farm is being sought. This reflects the lifespan of modern-day turbines.

A permanent planning permission is being sought for the grid connection and substation as these will become an asset of the national grid under the management of EirGrid and will remain in place upon decommissioning of the wind farm.

The Board has determined by Decision Ref. ABP-313440-22 that the proposed Development constitutes Strategic Infrastructure Development as defined by section 2(1) of the Planning and Development Act 2000, as amended by section 6 of the Planning and Development (Strategic Infrastructure) Act 2006, and that a planning application should be made directly to the Board under Section 37E.

The Development will be a significant regional construction project providing a sizable economic benefit through local investment, employment, local authority rates, and contribution to local community benefit funds in accordance with Government, regional and local planning policies.

The Development requires an Environmental Impact Assessment (EIA) as it comes within class 3(i) of Annex II to the EIA Directive 2011/92/EU as amended by Directive 2014/52/EU and is above the threshold set for this class of project by Schedule 5, Part 2 of the Planning and Development Regulations 2001, as amended. An Environmental Impact Assessment Report (EIAR) is submitted with this application.

An Appropriate Assessment Screening of the implications of the proposed Development for European Sites forming part of the Natura 2000 Network is required, in accordance with the Habitats Directive 1992/43/EEC) and the Birds Directive 2009/147/EU, as transposed by Part XAB of the Planning and Development Act 2000, as amended. Based on the results of the screening exercise a Natura Impact Statement (NIS) is submitted with this application.

1.1.1 Purpose and Structure of the Planning Statement

This Planning Statement considers the Development's accordance with the principle of Proper Planning and Sustainable Development, having regard to Government, Regional and County-level planning policies and plans including the County Development Plan, together with relevant statutory guidelines. In this context it is noted that there are a number of relevant documents in various forms including the draft wind energy development guidelines published for public consultation in December 2019, which will supersede the 2006 Wind Energy Guidelines, once adopted.

The Statement is set out as follows:

- **Section 1: Introduction**
- **Section 2: The Need for The Development**
- **Section 3: Regional Energy Policy**
- **Section 4: Development Plan Policy Appraisal**
- **Section 5: Material Planning Considerations**
- **Section 6: Conclusion**

2.0 NEED FOR THE DEVELOPMENT – INTERNATIONAL AND NATIONAL POLICY

This section outlines the need for the Development based on an assessment of the need to implement legally binding national climate change targets by encouraging appropriate renewable energy development throughout Ireland.

2.1 The Climate Emergency

On 29th November 2019 the European Parliament declared a climate emergency ahead of the UN COP 25 in Madrid in December 2019. In May 2019 the Oireachtas declared a “climate emergency” in an amendment to the report ‘Climate Action: A cross-party consensus for action’ which followed the recommendations of the Citizens Assembly on Climate Action. There then followed the publication of the Cross-Departmental Climate Action Plan 2019 on 17th June 2019. The Plan reflects the accepted wisdom that decisive and urgent action is required to arrest the acceleration of greenhouse gas emissions within the limited window of opportunity that remains. The Plan is ambitious, affecting almost every sector of the economy. The key focus of the Plan is to identify how the Government will reduce Ireland's, still growing, greenhouse gas emissions.

The Plan includes a new commitment to make Ireland 100% carbon neutral by 2050 and contains 183 action points designed to achieve our national climate change targets. The scale of the challenge is huge, and the Plan identifies the need for everyone to contribute to tackling the challenges posed by climate change. It includes increased renewable electricity targets, the end of single use non-recyclable plastics and new building regulations. It will impact how our homes and businesses are heated, how we generate and consume electricity, how we travel and how food is produced. This includes supporting the growth of Electric Vehicles to at least 800,000 and implementing policies to attain the installation of 600,000 heat pumps to decarbonise heating demand and meeting 70% of this increased electricity demand, from renewable sources, all by 2030. This is more than double the current level of renewable energy penetration.

Under the 2009 Renewable Energy Directive, Ireland is committed to produce at least 16% of all energy consumed by 2020 from renewable sources. This is to be met by the following proportion of sector demands being met by renewable sources: 40% of electricity, 12% of heating and 10% of transport. The Government target to have 40% of all electricity consumed to come from renewable sources by 2020 has been superseded by a further pledge to generate 80% of the country's electricity supply from renewable sources by 2030 in the Climate Action Plan 2021.

Ireland is facing significant challenges in efforts to meet these targets alongside its commitment to transition to a low carbon economy by 2050. Onshore Wind energy, in line with the CAP21 needs to increase to 8,000 MW by 2030, requiring an additional 4,000 MW of installed capacity, double the existing onshore wind capacity. Renewables accounted for 35% of electricity generated in 2021 (down from a high of 42% in 2020), this needs to increase to 80% by 2030 to achieve the national target. Therefore, there is a clear necessity of urgent national importance to increase the amount of energy from renewable sources, especially wind.

2.2 **International Energy Policy**

International energy policy is based on the demand to battle climate change and reduce carbon dioxide (CO₂) emissions and, therefore, is relevant to renewable energy development.

The United Nations Framework Convention on Climate Change (UNFCCC)¹⁰ implemented by the United Nations in May 1992, determined a long-term objective to lessen greenhouse gases in the atmosphere, with the purpose of preventing anthropogenic interference with the climatic system. Subsequently, the Kyoto Protocol was implemented in 1997. National governments who signed up to the Kyoto Protocol are committed to reducing their greenhouse gas emissions. The UNFCCC 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 convention enjoys near universal membership, with 197 countries listed as being Parties to the Convention.¹¹

The Kyoto Protocol is an international treaty which extends the 1992 United Nations Framework Convention. The Kyoto Protocol came into effect in 2005, as a result of which, emissions reduction targets agreed by developed countries, including Ireland, are now binding. Under the Kyoto Protocol, the EU agreed to achieve a significant reduction in total greenhouse gas emissions of 8% below 1990 levels in the period 2008 to 2012. Ireland's contribution to the EU commitment for the period 2008 – 2012 was to limit its greenhouse gas emissions to no more than 13% above 1990 levels.

In Doha, Qatar, on 8 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 January 2013 to 31 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.

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.

The Paris Agreement is a legally binding international treaty on climate change. It was adopted by 196 Parties at COP 21 in Paris, on 12 December 2015 and entered into force on 4 November 2016. It seeks to accelerate and intensify the actions and investment needed for a sustainable low carbon future. Its central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2 degrees Celsius above pre-industrial levels and to

¹⁰ The United Nations Framework Convention on Climate Change (UNFCCC) (1992). Available online at: <http://unfccc.int/resource/docs/convkp/conveng.pdf> [Accessed 02/10/2019]

¹¹ http://unfccc.int/essential_background/items/6031.php

pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. The Agreement also aims to strengthen the ability of countries to deal with the impacts of climate change. On 5 October 2016, the threshold for entry into force of the Paris Agreement was achieved. Ireland is legally bound by Article 7 of the United Nations COP21 Paris Agreement¹⁰, signed in December 2015, to prepare and submit periodic updates on its national adaptation and mitigation plans in the global effort to keep global warming below 1.5°C. (See section 2.4; National energy Policy below).

The United Nation's (UN) 26th global climate summit was held in 2021 in Glasgow, where nations committed to a range of decisions in a collective effort to limit global temperatures to 1.5 degrees. The conference focussed on driving action across.

- Mitigation - reducing emissions
- Adaptation - helping those already impacted by climate change
- Finance - enabling countries to deliver on their climate goals
- Collaboration - working together to deliver even greater action

Out of 189 Parties that have ratified the Paris Agreement, 90% mentioned renewables and roughly 70% included quantifiable energy targets in their initial Nationally Determined Contributions.

However, a report by the International Energy Agency¹² cautions that renewables growth will still need to double to reach the Paris Agreement goal of achieving net-zero emissions by 2050. The International Renewable Energy Agency (IRENA), an intergovernmental organisation focusing on sustainable energy, in a report¹³ on the Nationally Determined Contributions relating to renewable energy also note that even with the renewable energy pledges in the 2021 Paris agreement the 1.5°C goal will still be exceeded before the end of the century.

2.3 **European Energy Target**

The European Union's (EU) energy policies are set out and powered by three main objectives:

- To ensure energy providers operate in a competitive environment, ensuring affordable prices for homes and businesses;
- To secure energy supplies and to ensure reliable energy delivery whenever and wherever it is needed; and
- To have sustainable energy consumption, through lowering dependence on fossil fuels and decreasing greenhouse gas emissions and pollution.

The EU produced the Renewable Energy Directive 2009/28/EC⁶, revised in 2018¹¹, to make the EU a global leader in renewable energy and ensure that the target of the final energy consumption being at least 16% renewables by 2020 and 27% renewables are met by 2030. Subsequently, in 2015, the EU set itself a long-term goal of reducing greenhouse gas emissions by 80-95%, when compared to 1990 levels, by 2050.

¹² <https://www.iea.org/reports/renewables-2021>

¹³ https://www.irena.org/-/media/Files/IRENA/Agency/Publication/2022/Jan/IRENA_NDCs_RE_Targets_2022.pdf

In May 2022, the commission published The “REPowerEU Plan¹⁴” which puts forwards a set of actions to:

- Save energy;
- Diversify supplies;
- Quickly substitute fossil fuels by accelerating Europe’s clean energy transition;
- Smartly combine investments and reforms.

It notes that

“Slow and complex permitting processes are a key obstacle to unleashing the renewables revolution and for the competitiveness of the renewable energy industry”

The RePowerEU plan also includes an amendment to the Renewable Energy Directive¹⁵.

It notes that:

“Lengthy administrative procedures are one of the key barriers for investments in renewables and their related infrastructure. These barriers include the complexity of the applicable rules for site selection and administrative authorisations for projects, the complexity and duration of the assessment of the environmental impacts of the projects, grid connection issues, constraints on adapting technology specifications during the permit-granting procedure, or staffing issues of the permit-granting authorities or grid operators. In order to accelerate the pace of deployment of renewable energy projects it is necessary to adopt rules which would simplify and shorten permit-granting processes.”

Amendments to the directive include:

- Renewable energy plans are presumed to be of ‘overriding public interest’
- Increasing the European Union’s renewable energy target to 45%.

In 2020 the EU reached a 22.1%¹⁶ share of its gross final energy consumption from renewable sources which leaves a long way to go to reach this increased target.

In accordance with the REPowerEU Communication, in May 2022 the Commission published a recommendation¹⁷ on speeding up permit-granting procedures for renewable energy projects, accompanied by guidance to help the Member States speed up permitting for renewable energy plants.

The recommendation was created in order to help Member States exploit all possibilities for acceleration that exist within the legislative framework. It proposes measures to streamline procedures at national level, addresses ambiguities in the application of EU legislation and sets out good practices in Member States. It recommends participatory approaches that involve local and regional authorities and providing authorities with the necessary resources so as to facilitate the timely realisation of locally adapted investments.

¹⁴ https://eur-lex.europa.eu/resource.html?uri=cellar:fc930f14-d7ae-11ec-a95f-01aa75ed71a1.0001.02/DOC_1&format=PDF

¹⁵ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52022PC0222&from=EN>

¹⁶ https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Renewable_energy_statistics#Share_of_renewable_energy_more_than_doubled_between_2004_and_2020

¹⁷ [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=PI_COM:C\(2022\)3219&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=PI_COM:C(2022)3219&from=EN)

Recommendations include:

*“Member States should ensure that the planning, construction and operation of plants for the production of energy from renewable sources, their connection to the electricity, gas and heat grid and the related grid itself and storage assets **qualify for the most favourable procedure available in their planning and permit-granting procedures** and are **presumed as being in the overriding public interest** and in the **interest of public safety**, in view of the legislative proposal amending and strengthening the provisions of Directive (EU) 2018/2001 related to administrative procedures and without prejudice to the Union law.”*

“Member States should establish clearly defined, accelerated and as short as possible deadlines for all the steps required for the granting of permits to build and operate renewable energy projects, specifying the instances where such deadlines may be extended and under which circumstances. Member States should establish binding maximum deadlines for all relevant stages of the environmental impact assessment procedure.”

The directive target increase and change of wording to “over riding public interest” underlines the vital nature of investments into new renewable energy developments such as Gortyrhilly Wind Farm, which would increase the domestic renewable energy production capacity of Ireland and its contribution to the EU overall target.

2.4 National Policy

The EU Governance of the Energy Union and Climate Action Regulation 2018/1999 came into force when it was published in the Official Journal of the EU 11 December 2018. It requires Member States to develop integrated national energy and climate plans to cover:

1. Security, Solidarity and Trust – Working closely with Member States to diversify Europe’s sources of energy and ensure energy security
2. A fully-integrated internal energy market – Energy should flow freely across the EU, without technical or regulatory barriers. This would enable energy providers to compete freely and promote renewable energy while providing the best energy prices
3. Energy Efficiency – Improving energy efficiency to reduce the EU’s dependence on energy imports, cut emissions and drive jobs and growth
4. Climate Action – Putting in place policies and legislation to cut emissions, moving towards a low-carbon economy and fulfilling the EU’s commitments to the Paris Agreement on climate change
5. Research, Innovation and Competitiveness – Supporting research and innovation in low-carbon and clean energy technologies which can boost the EU’s competitiveness

National Planning Framework The two relevant policies for consideration in the NFP are 54 and 55 see sections below.

2.4.1.1 **National Policy Objective 54**

“Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.”

National Policy Objective 54 has been fulfilled by the establishment of national, regional and local policy to facilitate renewables. By demonstrating accordance with these policies, the Development will therefore contribute to the achievement of the national policy objective.

2.4.1.2 **National Policy Objective 55**

“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 Site is in an area designated as ‘Open to Consideration’ for wind development in the Cork CDP, the location has been assessed as having suitable wind resources and has been assessed against each of the topics contained in the EIAR and adverse residual environmental impacts are avoided in line with National Policy Objective 55 of the NFP. It is clear from the findings of the EIAR and the NIS that the Development is an appropriate location.

2.4.2 **National Energy Security Framework**

A new Energy Security Emergency Group was established in April 2022 to coordinate and oversee Ireland’s response to the Russian invasion of Ukraine. This group, chaired by the Department of the Environment, Climate and Communications, has overseen the development of a new National Energy Security Framework¹⁸ in April 2022.

The National Energy Security Framework coordinates work on energy security across the oil, gas and electricity sectors and sets out a ‘whole-of-government’ response to energy security including a key focus on energy affordability.

It provides a single overarching and initial response to address Ireland’s energy security needs in the context of the war in Ukraine. It sets out how Ireland is seeking to phase out dependency on Russian gas, oil and coal imports as soon as possible in order to address the urgent need to secure Ireland’s energy supply.

It is focused on three areas of work:

- Reducing demand for fossil fuels, which would seek to reduce overall demand for oil, natural gas and coal in Ireland.

¹⁸ <https://www.dccae.gov.ie/documents/Energy%20White%20Paper%20-%20Dec%202015.pdf>

- Replacing fossil fuels with renewables, which would seek to reduce the use of gas, oil and coal in Ireland by replacing it with renewable energy sources such as wind energy, solar energy or bioenergy.
- Diversifying fossil fuel supplies, which would seek to replace any Russian supplies of gas, oil and coal (direct or indirect) with supplies from other sources.

The framework highlights the impact of the Russian invasion of Ukraine on energy security, consumer price wise in the short term and how and where energy is sourced to ensure long term system resilience. It notes that:

“The war has highlighted key dependencies in our energy system which can no longer be relied on and has led to affordability issues for many consumers and businesses”

The framework builds on the idea of energy security as the uninterrupted availability of energy sources at an affordable price and is a response to the challenges of ensuring the ongoing and long-term security of affordable energy supply.

The new framework underlines the importance of new renewable energy generation projects, such as the Gortyrhilly Wind Farm, in securing Ireland's energy supply in light of the war in Ukraine and resulting energy supply issues.

2.4.3 Climate Action and Low Carbon Development Act 2021

The Climate Action and Low Carbon Development (Amendment) Act 2021 commits Ireland to reach a legally binding target of net-zero emissions no later than 2050, and a cut of 51% by 2030 (compared to 2018 levels).

It establishes a framework with clear, legally binding targets and commitments, and ensures the necessary structures and processes are embedded on a statutory basis to achieve our national, EU and international climate goals and obligations in the near and long term.

The Act includes the following key elements:

- Places on a statutory basis a 'national climate objective', which commits Ireland to pursue and achieve no later than 2050, the transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy
- Embeds the process of carbon budgeting into law, Government are required to adopt a series of economy-wide five-year carbon budgets, including sectoral targets for each relevant sector, on a rolling 15-year basis, starting in 2021
- Actions for each sector will be detailed in the Climate Action Plan, updated annually
- A National Long Term Climate Action Strategy will be prepared every five years

2.4.4 The Climate Action Plan 2021

The Climate Action Plan 2021 sets out a detailed sectoral roadmap designed to deliver a 51% reduction in greenhouse gas (GHG) emissions by 2030. This doubles the ambition of the 2019 Plan and requires significant reductions from all sectors.

The Plan aims to evaluate in detail the changes that are required in order “*to halve our emissions by 2030 and reach net zero no later than 2050, as we committed to in the Programme for Government*”.

The critical nature of the climate change challenge is identified in the plan as are the extensive direct and indirect threats of harm to Ireland and its people. The onus to mitigate the magnitude of long-term climate change by taking action to reduce greenhouse gas emissions is a key point reiterated throughout the plan.

The plan highlights that the transition to a cleaner greener economy must be fair and acknowledges that some sectors will be more impacted than others. It also describes the burden the COVID-19 pandemic placed on the economy and society and emphasises that recovery must embed climate resilience and include structural changes that break the links between fossil fuels and economic progress.

It sets an ambitious 80% target for electricity production from renewable sources by 2030 and highlights the need to remove barriers to the development of renewables, including onshore wind.

The plan identifies that this will directly reduce emissions but also help with the electrification of other sectors such as transport and heat, reducing emissions in those sectors too. The plan notes that the transition away from fossil fuels and towards locally generated renewables will improve energy security and Ireland's dependence on imported energy.

The proposed Development will contribute to the de-carbonisation of the Irish electricity network by producing 78.4-92.4 MW of renewable electricity, contributing to the Government's 80% renewable electricity target by 2030. This will help to mitigate the impacts of climate change by reducing the emissions related to energy production and will help to decarbonise multiple sectors.

2.4.5 National Energy and Climate Plan 2021-2030

The National Energy and Climate (ENCP) Plan¹⁹ is a ten-year integrated document mandated by the European Union to each of its member states in order for the EU to meet its overall greenhouse gases emissions targets.

The plan establishes key measures to address the five dimensions of the EU Energy Union:

- 1) Decarbonisation: GHG emissions and removals and Renewable Energy
- 2) Energy efficiency

¹⁹ https://energy.ec.europa.eu/system/files/2020-08/ie_final_necp_main_en_0.pdf

- 3) Energy security
- 4) Internal energy market
- 5) Research, innovation and competitiveness

Key, relevant renewable energy objectives include:

- Ireland has established an objective of achieving a 34% share of renewable energy in energy consumption by 2030.
- Increase electricity generated from renewable sources to 70% (note this target has been increased to 80% in the CAP21), underpinned by the Renewable Electricity Support Scheme (RESS). Streamline consenting and connection arrangements.
- Phase-out of coal and peat-fired electricity generation.
- Increase onshore wind capacity by up to 8.2 GW.

Key, relevant energy security objectives include:

- Support efforts to increase indigenous renewable sources in the energy mix, including wind, solar and bioenergy.
- Facilitate infrastructure projects, including private sector commercial projects, which enhance Ireland's security of supply and are in keeping with Ireland's overall climate and energy objectives.

3.0 **REGIONAL ENERGY POLICY**

The Local Government Reform Act 2014 provided for the dissolution of the eight regional authorities and two regional assemblies and for their replacement with three new regional assemblies. The three new regional assemblies were established in 2015 representing the Northern and Western, Eastern and Midland and Southern Regions. Members of the Regional Assemblies consist of the local authorities within that region.

The Regional Spatial and Economic Strategy (RSES) for the Southern Region provides a long-term regional level strategic planning and economic framework, to support the implementation of the National Planning Framework, for the future physical, economic and social development for the Southern Region.

The Regional Spatial and Economic Strategy (RSES) for the Southern Region was adopted on the 31st of January 2020. The objective of the RSES is to support the implementation of the National Planning Framework – Project Ireland 2040 and the economic policies and objectives of the Government by providing a long-term planning and economic framework, which shall be consistent with the NPF and the economic policies or objectives of the Government.

The RSES for the Southern Region provides a long-term regional level strategic planning and economic framework, to support the implementation of the National Planning Framework, for the future physical, economic and social development for the Southern Region.

One of the key objectives of the RSES is to prioritise action on climate change across all strategic areas and in all economic sectors supported by a robust implementation of time-bound and measurable objectives on climate action for the Southern Region.

The RSES recognises and supports opportunities for onshore wind as a major source of renewable energy with an important role in delivering value and clean electricity for Ireland.

It says:

“Opportunities for both commercial and community wind energy projects should be harnessed, having regard to the requirements of DoHPLG Guidelines on Wind Energy”.

Section 2.1 of the RSES sets out the strategic vision for the Southern Region. The RSES acknowledges that climate change represents the most serious threat to human life and the environment. The Southern Regional Assembly supports the implementation of the Government's Climate Action Plan 2019, and the RSES has identified three priority areas for action to address climate change and to bring about a Transition to a Low Carbon Economy and Society:

- *Decarbonisation*
- *Resource Efficiency*

- *Climate Resilience*

The targets for reduction of emissions across different sectors will be further developed, including key targets for 55% movement by sustainable transport modes. This will be supported by a robust implementation of time-bound and measurable objectives on climate action for the Southern Region. Once adopted, the implementation structures will be established to pursue the objectives identified in the RSES – including the priority areas for action.

There are a number of policies within the RSES which are relevant to the Development. The following policies are of particular relevance:

Table 3.1: Key Planning Policy Objectives from the RSES

RPO	Policy Details	Comment
RPO 96	<p><i>Integrating Renewable Energy Sources</i></p> <p><i>It is an objective to support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate a renewable energy source and ensure our national and regional energy system remains safe, secure, and ready to meet increased demand as the regional economy grows.</i></p>	The Development includes a substation which will become an asset of the national grid network and will make a meaningful contribution to electricity supply.
RPO 99	<p><i>Renewable Wind Energy</i></p> <p><i>It is an objective to support the sustainable development of renewable wind energy (on shore and off shore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.</i></p>	The Development has the capacity to generate 78.4-92.4 MW of renewable wind energy.
RPO 100	<p><i>Indigenous Renewable Energy Production and Grid Injection</i></p> <p><i>It is an objective to support the integration of indigenous renewable energy production and grid injection.</i></p>	The Development has the capacity to generate 78.4-92.4 MW of renewable indigenous wind energy which meets the objective of RPO 100.
RPO 101	<p><i>International Hub for Energy Innovation</i></p> <p><i>It is an objective to support continued innovation and research in the energy sector and to develop a role as an international hub for energy innovation.</i></p>	The Development meets the objective outlined in RPO 101 in so far as it will help the Irish energy sector develop as an international hub for energy innovation.

The RSES sets the framework for the County Development Plans, in this case the Cork County Development Plan 2022-2028 and the Kerry County Development Plan 2022-2028. Both plans highlight the vital importance of a reliable energy supply, increasing renewable energy in line with regional and national targets and the need to transition to a low carbon economy and society.

3.1 Summary of Need for Development

The Russian invasion of Ukraine and resulting energy supply issues combined with Ireland's heavy dependence (72% in 2020²⁰) on fossil fuel imports makes it imperative that renewable, domestically produced energy is increased which is reflected in the National Energy Security Framework.

The National Energy and Climate Plan 2021-2030 and the Climate Action Plan 2021 sets out a target for 80% electricity to come from renewable sources by 2030. In 2021 this was at 35% so there is a high demand for new renewable energy sources to achieve this target. Decarbonisation and energy security are also key objectives of both the National Energy and Climate Plan 2021-2030 and CAP21.

The CAP21 sets a target of increasing onshore wind to 8.2 GW by 2030, as of May 2022 this was 4.3 GW²¹, leaving a shortfall of 3.9 GW to be achieved in the next 8 years. The Development would contribute 78.4-92.4 MW of renewable, domestically produced wind energy, helping Ireland to reduce emissions, improve energy security and achieve renewable electricity targets.

The Regional Spatial and Economic Strategy (RSES) for the Southern Region recognises and supports opportunities for onshore wind as a major source of renewable energy with an important role in delivering value and clean electricity for Ireland. Therefore overall, it is considered that the Development is in accordance with National and regional Policy.

²⁰ SEAI. (2021). ENERGY IN IRELAND. https://www.seai.ie/publications/Energy-in-Ireland-2021_Final.pdf

²¹ <https://windenergyireland.com/about-wind/facts-stats>

4.0 DEVELOPMENT PLAN POLICY APPRAISAL

4.1 Introduction

The Cork County Development Plan (CCDP) 2022-2028 was adopted on Monday 25th April 2022 and it came into effect on Monday 6th June 2022. The CCDP sets out the blueprint for development in the county.

4.2 Cork County Development Plan 2022-2028 Assessment

The CCDP underpins its visions and main aims for the county by core quality of life principles, those most relevant to the Development include Sustainability and Climate Action. It includes a chapter (13) on Energy and Telecommunications, the aim of which is to:

“Facilitate and support investment in sustainable energy production and infrastructure in Cork to meet the future local, regional and national needs, while transitioning to a low carbon economy, addressing the climate change challenge with greenhouse gas emissions and protection of the environmental, cultural and heritage assets of the county”

The CDP outlines the importance of reliable energy supply and the growing energy demand in the county. Section 13.5 expands on the commitments of the county towards increasing renewable energy in line with national targets. In terms of wind energy, the plan states:

*“Cork County currently has 38 commissioned wind farms with capacity of 603 MW, equivalent to approximately 16% of the national capacity. However, if Ireland is to meet our renewable energy target then we need to **double capacity nationally over the next ten years**. On a pro rata basis, that could see capacity in **Cork expand to 1,100 MW**. At present they are valid but unimplemented permissions in the county for a further 200 MW of wind power.”*

Accounting for the unimplemented permissions, Cork county remains almost 300 MW behind their target for wind energy. The proposed development, by contributing 78.4-92.4 MW, will assist Cork Co. in achieving these targets.

The CCDP policies relevant to the Development are set out in Table 4.1. The Development has been assessed against these in order to illustrate compliance with the relevant policies set out in the CCDP.

The Development, and its associated rural economic development, is appropriate at this location and will help to support new and existing employment in the construction and renewables industries. Environmental and amenity considerations have been assessed in the EIAR and the findings confirm the Development is in compliance with the relevant objectives and policies in the CCDP.

Planning policy considerations are presented under key environmental topics which correspond to the chapter headings of the EIAR. Material considerations comprising regional and national planning policy and guidance, including emerging policy, are considered in Section 5 below. There is a positive policy presumption in favour of renewable energy projects at National, Regional and Local Level.

Table 4.1: Relevant Planning Policies from The Cork County Development Plan 2022-2028

Chapter	Policy Details	Development Policy Appraisal
13	<p>ET 13.1 Energy</p> <p>a) <i>Ensure that County Cork fulfils its potential in contributing to the sustainable delivery of a diverse and secure energy supply and to harness the potential of the county to assist in meeting renewable energy targets and managing overall energy demand.</i></p> <p>b) <i>During the life of this plan, the Planning Authority will prepare a renewable energy strategy for the county.</i></p>	<p>The Development will make a significant and meaningful contribution to renewable energy targets in the county.</p> <p>The additional renewable energy that the Development will generate will help support Ireland's wider low carbon transition helping to meet the additional electrical demand created by electrification of the transport and heating networks and growing tech industry installations such as data centres.</p>
13	<p>ET 13.2 Renewable Energy</p> <p>a) <i>Support Ireland's renewable energy commitments as outlined in Government Energy and Climate Change policies by facilitating the development of renewable energy sources such as wind, solar, geothermal, hydro and bioenergy and energy storage at suitable locations within the county where such development has satisfactorily demonstrated that it will not have adverse impacts on the surrounding environment (including water quality), landscape, biodiversity or amenities.</i></p> <p>b) <i>Support and facilitate renewable energy proposals that bring about a direct socio-economic benefit to the local community. The Council will engage with local communities and stakeholders in energy and encourage developers to consult with local communities to identify how they can invest in/gain from significant renewable energy development.</i></p> <p>c) <i>Support the development of new and emerging renewable energy technologies / fuels for the transport sector.</i></p> <p>d) <i>To promote the potential of micro renewables where it can be demonstrated that that it will not have adverse impacts on the surrounding environment (including water quality), landscape, biodiversity or amenities.</i></p>	<p>The Policy wording of ET 13.2 recognises the opportunity to benefit from increased renewable energy generation with limited additional environmental impacts and this is consistent with the findings of EIAR.</p> <p>In Chapter 4 Population and Human Health the socio-economic impacts of the development are assessed in terms of impacts on the economy, employment and population.</p> <p>This chapter has assessed the significance of potential effects of the Development on population and human health. The Development has been assessed as having the potential to result in effects of a slight positive, long-term impact overall. Through the implementation of mitigation measures, the cumulative effects associated with the Development are predicted to be not significant.</p>

Chapter	Policy Details	Development Policy Appraisal
<p>13</p>	<p>ET 13.4: Wind Energy</p> <p><i>In order to facilitate increased levels of renewable energy production consistent with national targets on renewable energy and climate change mitigation as set out in the National Energy and Climate Plan 2021-2030, the Climate Action Plan 2021, and any updates to these targets, and in accordance with Ministerial Guidelines on Wind Energy Development, the Council will support further development of on-shore wind energy projects including the upgrading, repowering or expansion of existing infrastructure, at appropriate locations within the county in line with the Wind Energy Strategy and objectives detailed in this chapter and other objectives of this plan in relation to climate change, biodiversity, landscape, heritage, water management and environment etc.</i></p>	<p>The Development meets the objectives set down in policy ET 13.4, by providing much needed renewable energy where there is a pressing need to meet the Government ambitious 80% renewable electricity target by 2030 as set out in the Climate Action Plan 2021.</p> <p>Landscape; The Development complies with the Wind Energy Strategy section 13.6.3 of the CDP; the Site is within a broad area that is deemed to be 'Open to consideration' for Wind Farms. See Figure 3.1:</p> <p>In Chapter 12 of the EIAR for the Development, the Landscape and Visual assessment concluded that the Development would not give rise to any significant landscape or visual amenity effects (including residential amenity). The EIAR L&V chapter also considered effects upon "views and prospects" included in the CCDP. The findings demonstrate that the landscape can accommodate the Development without giving rise to significant effects.</p> <p>Climate change; By producing renewable energy the Development contributes to mitigating climate change by reducing emissions in the energy sector This is Fully assessed in Chapter 10: Air and Climate</p> <p>Biodiversity; EIAR Chapters 5, 6 and 7 assesses the potential impact of the development on terrestrial ecology, aquatic ecology and ornithology; respectively. A Habitat Management Plan has been developed that will provide ecological conservation of the Site for the long term. It will manage implementation of a range of steps positively influencing biodiversity of the Site. This is Fully assessed in Chapter 5: Terrestrial Ecology, Chapter 6: Aquatic Ecology and Chapter 7: Ornithology. The findings demonstrate that the environment can accommodate the Development without giving rise to significant biodiversity impacts.</p> <p>Heritage; It was found that there are no recorded monuments within the site boundary and therefore direct effects are considered unlikely. No significant indirect effects have been predicted. Standard construction</p>

Chapter	Policy Details	Development Policy Appraisal
		<p>mitigation has been proposed to further reduce any potential effects that could arise due to the discovery of any new items of archaeological value. The findings demonstrate that the environment can accommodate the Development without giving rise to significant impacts to cultural heritage. This is Fully assessed in Chapter 14: Cultural Heritage</p> <p>Water management; This is Fully assessed in Chapter 9: Hydrology and Hydrogeology The findings demonstrate that the environment can accommodate the Development without giving rise to significant hydrological impacts.</p> <p>Environment; This is assessed throughout the EIAR</p>
13	<p>ET 13.5: Wind Energy Projects</p> <p>a) <i>Support a plan led approach to wind energy development in County Cork through the identification of areas for wind energy development. The aim in identifying these areas is to ensure that there are no significant environmental constraints, which could be foreseen to arise in advance of the planning process.</i></p> <p>b) <i>On-shore wind energy projects should focus on areas considered 'Acceptable in Principle' and 'Areas Open to Consideration' and generally avoid "Normally Discouraged" areas in this Plan.</i></p>	<p>The Development will add to The Cork County Council's renewable energy portfolio and contribute to climate change adaptation. It has been found not to have any (visual/noise/shadowing) significant adverse effect upon the amenity of any inhabited residential dwellings.</p> <p>The development is located within an Area Open to Consideration in the County Development and has been assessed for its impacts on the environment, including biodiversity, population and human health etc</p> <p>It is therefore asserted that the Development supports CCDP objectives.</p>
13	<p>ET 13.7 Open to Consideration</p> <p><i>Commercial wind energy development is open to consideration in these areas where proposals can avoid adverse impacts on:</i></p> <ul style="list-style-type: none"> • <i>Residential amenity particularly in respect of noise, shadow flicker and visual impact;</i> • <i>Urban areas and Metropolitan/Town Green Belts;</i> 	<p>The Development is located in an area of the county which is open to consideration for commercial wind energy development, provided that the proposal can avoid adverse impacts on residential amenity, urban areas, natura 2000 sites, archaeological heritage, landscape impacts and cumulative impacts.</p> <p>The Development has been assessed against each of the topics contained in The EIAR and adverse residual impacts are avoided.</p>

Chapter	Policy Details	Development Policy Appraisal
	<ul style="list-style-type: none"> • <i>Natura 2000 Sites (SPA and SAC), Natural Heritage Areas (NHA's) or adjoining areas affecting their integrity and other sites of significant ecological value.</i> • <i>Architectural and archaeological heritage;</i> • <i>Visual quality of the landscape and the degree to which impacts are highly visible over wider areas.</i> • <i>In planning such development, consideration should also be given to the cumulative impacts of such proposals."</i> 	<p>The planning application is accompanied by an EIAR and NIS which assess the potential impacts of The Development on the receiving environment and landscape.</p> <p>The EIAR submitted as part of the planning application has considered fully all the criteria listed under the following chapters:</p> <ul style="list-style-type: none"> • Chapter 3: Alternatives Considered • Chapter 4: Population and Human Health including Shadow Flicker • Chapter 5: Terrestrial Ecology • Chapter 6: Aquatic Ecology • Chapter 7: Ornithology • Chapter 8: Soils and Geology • Chapter 9: Hydrology and Hydrogeology • Chapter 10: Air and Climate • Chapter 11: Noise • Chapter 12: Landscape and Visual Amenity • Chapter 13: Material Assets and Other Issues • Chapter 14: Cultural Heritage • Chapter 15: Traffic and Transportation • Chapter 16: Major Accidents & Natural Disasters <p>The design of the Development recognises the surrounding habitat sensitivity and has sought to minimise effects upon biodiversity throughout by proposing the reuse of existing infrastructure, and only increasing the net land take where it is absolutely unavoidable.</p> <p>Landscape</p> <p>In Chapter 12 of the EIAR for the Development, the Landscape and Visual assessment concluded that the Development would not give rise to any significant landscape or visual amenity effects (including residential amenity).</p>

Chapter	Policy Details	Development Policy Appraisal
		<p>The EIAR L&V chapter also considered effects upon “views and prospects” included in the CCDP.</p> <p>The findings demonstrate that the landscape can accommodate the Development without giving rise to significant effects.</p> <p>Noise Impacts</p> <p>The closest inhabited dwelling (H2) is located 753m from the nearest turbine. Chapter 11 addresses Noise, it concluded that noise during construction, operation and decommissioning of the wind farm will be managed to comply with best practice, legislation and guidelines current at that time so that effects are not significant. The findings demonstrate that the environment can accommodate the Development without giving rise to significant noise impacts.</p> <p>Archaeology</p> <p>It was found that there are no recorded monuments within the site boundary and therefore direct effects are considered unlikely. No significant indirect effects have been predicted.</p> <p>Standard construction mitigation has been proposed to further reduce any potential effects that could arise due to the discovery of any new items of archaeological value.</p> <p>The findings demonstrate that the environment can accommodate the Development without giving rise to significant impacts to cultural heritage.</p> <p>Ecology</p> <p>A Habitat Management Plan has been developed that will provide ecological conservation of the Site for the long term. It will manage implementation of a range of steps positively influencing biodiversity of the Site.</p>

Chapter	Policy Details	Development Policy Appraisal
		<p>In this regard the Development accords with policy ET 13.7.</p> <p>The findings demonstrate that the environment can accommodate the Development without giving rise to significant biodiversity impacts.</p>
13	<p>ET 13-9: National Wind Energy Guidelines</p> <p><i>“Development of on-shore wind should be designed and developed in line with the ‘Planning Guidelines for Wind Farm Development 2006’ and ‘Draft Wind Energy Development Guidelines 2019’ and any relevant update of these guidelines.”</i></p>	<p>The Development is in compliance with ET 13-9, and takes cognisance of the CCDP wind energy policy, DEHLG Wind Energy Development Guidelines 2006 and also the emerging guidance signalled by The Draft Wind Energy Development Guidelines 2019.</p>
13	<p>ET 13-10: Development in line with Best Practice</p> <p><i>“Ensure that wind energy developments in County Cork are undertaken in observance with best industry practices, and with full engagement of communities potentially impacted by the development. In accordance with the Code of Practice ‘Good Practice for Wind Energy Development Guidelines 2016’, wind energy development operators are required to put in place an effective complaints procedure in relation to all aspects of wind energy development projects, where members of the public can bring any concerns they have about operational difficulties, including noise and nuisance to the attention of the wind energy development operator.”</i></p>	<p>The design and environmental assessment of the Development has been undertaken to meet all extant, and emerging policy and guidance on wind energy development.</p> <p>Community engagement for the Development included providing three newsletters, having a dedicated project website for all to access, an introduction letter to FuturEnergy Ireland, project update letter, detailed project brochure, virtual tour, media releases, advertisements, posters, sponsored educational programs, 3 Public Information Days (Elected representatives meeting, Webinar, on-site local clinic). All communications materials have included contact details and provided easy ways of accessing the project team.</p> <p>A Community Consultation Report has been submitted to the Board as a standalone document as part of this planning application and is included in Appendix 1.3 of the EIAR. The report summarises the engagement and consultation that has taken place with the local community over the project lifecycle to date. Starting from the introduction of the project the whole way through to the project’s submission into planning, including reports of the PIDs, how we intend to continually engage with the local community into the future and details, how comments received have been considered and addressed in the Project.</p>

Chapter	Policy Details	Development Policy Appraisal
13	<p>ET 13-11: Public Consultation and Community Support</p> <p><i>(a) Require wind energy developers to carry out active public consultation with the local community in advance of and in addition to the statutory public consultation required as part of the planning application process.</i></p> <p><i>(b) Applications for large scale wind energy development require a 'Community Report' with the planning application documents detailing the full extent of community and wider public engagement.</i></p>	<p>During November 2021 the first PID was held as part of the Public Consultation process. There was a meeting arranged and held between the projects lead project manager, Community Liaison Officer, local TD's, local Councillors, where the project was presented on followed by an open Q & A session.</p> <p>The second PID was held as part of the Public Consultation process. A community webinar took place on the 21st of July at 7pm followed by a Q&A session.</p> <p>The Third PID was held as part of the Public Consultation process; Was held between July 26th, 27th 2022 at Ionad Áise, Renariee, Macroom, Co Cork, P12F447 (a venue close to the Site and easily accessible to local residents). It was decided that the public consultation events should take place between the hours of 11:00 am and 20:00 pm, to give as many of the community members as possible the chance to attend, to view the proposals and ask questions of the project team.</p> <p>Other community engagement for the Development included providing three newsletters, having a dedicated project website for all to access, an introduction letter to FuturEnergy Ireland, project update letter, detailed project brochure, virtual tour, media releases, advertisements, posters, and sponsored educational programs. All communications materials have included contact details and provided easy ways of accessing the project team.</p> <p>A Community Consultation Report has been submitted to the Board as a standalone document as part of this planning application and is included in Appendix 1.3 of the EIAR. The report summarises the engagement and consultation that has taken place with the local community over the project lifecycle to date. Starting from the introduction of the project the whole way through to the project's submission into planning, including reports of the PIDs, how we intend to continually engage with the local community into the future and details, how comments received have been considered and addressed in the Project.</p>

The Development Plan includes Chapter 14 'Green Infrastructure and Recreation', within which, sub-section 14.7 relates to landscape. A number of general objectives relating to landscape are noted within this chapter and are included below.

GI 14-9: Landscape:

- a) *Protect the visual and scenic amenities of County Cork's built and natural environment.*
- b) *Landscape issues will be an important factor in all land-use proposals, ensuring that a proactive view of development is undertaken while maintaining respect for the environment and heritage generally in line with the principle of sustainability.*
- c) *Ensure that new developments meet high standards of siting and design.*
- d) *Protect skylines and ridgelines from development.*
- e) *Discourage proposals necessitating the removal of extensive amounts of trees, hedgerows and historic walls or other distinctive boundary treatments.*

GI 14-10: Draft Landscape Strategy:

"Ensure that the management of development throughout the County will have regard for the value of the landscape, its character, distinctiveness and sensitivity as recognised in the Cork County Draft Landscape Strategy and its recommendations, in order to minimize the visual and environmental impact of development, particularly in areas designated as High Value Landscapes where higher development standards (layout, design, landscaping, materials used) will be required."

A Landscape Character Assessment was undertaken as part of the Draft Cork Landscape Strategy (2007). This has been incorporated within the current Development Plan and divides the county into 16 No. Landscape Character Types (LCTs). The site consists of three different LCTs. The majority of the area of the site is within the LCT12a 'Rolling Marginal and Forested Middleground.' However, the north/north-west of the site enters within LCT16c 'Glaciated Cradle Valleys,' while a very small section in the south-west corner of the site enters into LCT15a 'Ridged and Peaked Upland' (see **Figure 12.1**).

LCT12a 'Rolling Marginal and Forested Middleground':

Within the Draft Cork Landscape Strategy (2007), LCT12a 'Rolling Marginal and Forested Middleground' is described as having:

- Landscape Value: High
- Landscape Sensitivity: High
- Landscape Importance: Local

The stated 'Recommendations' that are of relevance to the site include:

"Protect the high ridges and mountainous peaks, which are predominant components of this landscape type, particularly surrounding the villages of Ballyvourney, Coolea and Ballymakeery.

“Ensure that the approach roads, particularly the scenic routes, to Ballyvourney, Coolea and Ballymakeery are protected from inappropriate development which would detract from the setting of these settlements.”

LCT16c 'Glaciated Cradle Valleys':

Within the Draft Cork Landscape Strategy (2007), LCT16c 'Glaciated Cradle Valleys' is described as having:

- Landscape Value: Medium
- Landscape Sensitivity: Medium
- Landscape Importance: Local

The stated 'Recommendations' that are of relevance to the site include:

“Respect the remote character and existing low-density development in this LCT.”

LCT15a 'Ridged and Peaked Upland':

Within the Draft Cork Landscape Strategy (2007), LCT15a 'Ridged and Peaked Upland' is described as having:

- Landscape Value: High
- Landscape Sensitivity: High
- Landscape Importance: County

The stated 'Pressures for change' that are of relevance to the site include:

“Windfarms can be seen off in the distance from certain elevated views within this landscape type. While their presence is noted, their visual impact is not major but an accumulation of more windfarms could have a more intolerable visual impact in the future.”

There are no stated 'Recommendations' that are of relevance to the proposed Development.

As well as the Site consisting of three Landscape Character Types (LCTs), there are also three Landscape Character Areas within the Site. The majority of the area of the Site is within the (LCA No. 23) Ballyvourney Landscape Character Area, which is described as being a “Composite Middle Valley of Rugged Scrub and Marginal Land.” However, the north/north-west of the Site enters within the (LCA No. 57) Foilanumera Landscape Character Area, which is described as being a “Glaciated Cradle and Forested Valley.” Lastly, a very small section in the south-west corner of the Site enters into the (LCA No. 33) Lough Allua Landscape Character Area, which is described as being a “Composite Middle Valley of Rugged Scrub, Mosaic and Marginal Land.”

Relevant objectives relating to 'Landscape Views and Prospects' within the CDP include:

GI 14-12: General Views and Prospects:

“Preserve the character of all important views and prospects, particularly sea views, river or lake views, views of unspoilt mountains, upland or coastal landscapes, views of historical or cultural significance (including buildings and townscapes) and views of natural beauty as recognized in the Draft Landscape Strategy.”

GI 14-13: Scenic Routes:

“Protect the character of those views and prospects obtainable from scenic routes and in particular stretches of scenic routes that have very special views and prospects identified in this plan.”

GI 14-14: Development on Scenic Routes:

“a) Require those seeking to carry out development in the environs of a scenic route and/or an area with important views and prospects, to demonstrate that there will be no adverse obstruction or degradation of the views towards and from vulnerable landscape features. In such areas, the appropriateness of the design, site layout, and landscaping of the proposed development must be demonstrated along with mitigation measures to prevent significant alterations to the appearance or character of the area.”

In the central study area, there are six Co. Cork scenic routes, one of which traverses the south-western corner of the Site:

- “Scenic Route S24: Road between Coolea and Coom,” located within approximately 2.2km north-west of the location of the nearest turbine.
- “Scenic Route S25: Winding road joining Coolea – Coom road to Lissacresig road,” which dissects the south-western corner of the Site and comes within approximately 160m of the nearest proposed turbine.
- “Scenic Route S26: Road between Lissacresig and the Mouth of the Glen,” which aligns the southern Site boundary as well as dissecting a small section of the south-western corner of the Site, while coming within approximately 320m of the nearest proposed turbine.
- “Scenic Route 27: Road between Gougane Barra and the Mouth of the Glen,” coming within approximately 2.6km of the nearest proposed turbine.
- “Scenic Route S32: South Lake Road – Inchigeela and Ballingeary to Keimaneigh,” coming within approximately 4.8km of the nearest proposed turbine.
- “Scenic Route S34: Road between Inchigeela and Ballingeary to Keimaneigh” coming within approximately 4.0km of the nearest proposed turbine.

Wind Energy Strategy

County Cork’s Wind Energy Strategy is in section 13.6.7 of the CCDP, it includes a sieve mapping analysis to identify the most suitable areas for wind energy development. The Site is within a broad area that is deemed to be ‘Open to consideration’ for wind energy developments (i.e. neither ‘Normally discouraged’ nor ‘Acceptable in principle’ nor an ‘Urban Area’). See **Figure 4.1**.

According to the strategy 'Open to consideration':

"comprises almost 50% of the County area. Within these areas there are locations that may have potential for wind farm developments but there are also some environmental issues to be considered. This area has variable wind speeds and some access to the grid..."

ET 13-7: Open to Consideration (CDP Objective)

"Commercial wind energy development is open to consideration in these areas where proposals can avoid adverse impacts on:

Residential amenity particularly in respect of [...] visual impact;

Visual quality of the landscape and the degree to which impacts are highly visible over wider areas."

Based on the landscape, visual and cumulative assessment which can be found in Chapter 12 Landscape and Visual Amenity, it is considered that there will not be any significant effects arising from the proposed Gortyrhilly Wind Farm and the Development is in cognisance with the Cork CDP Landscape Policies.

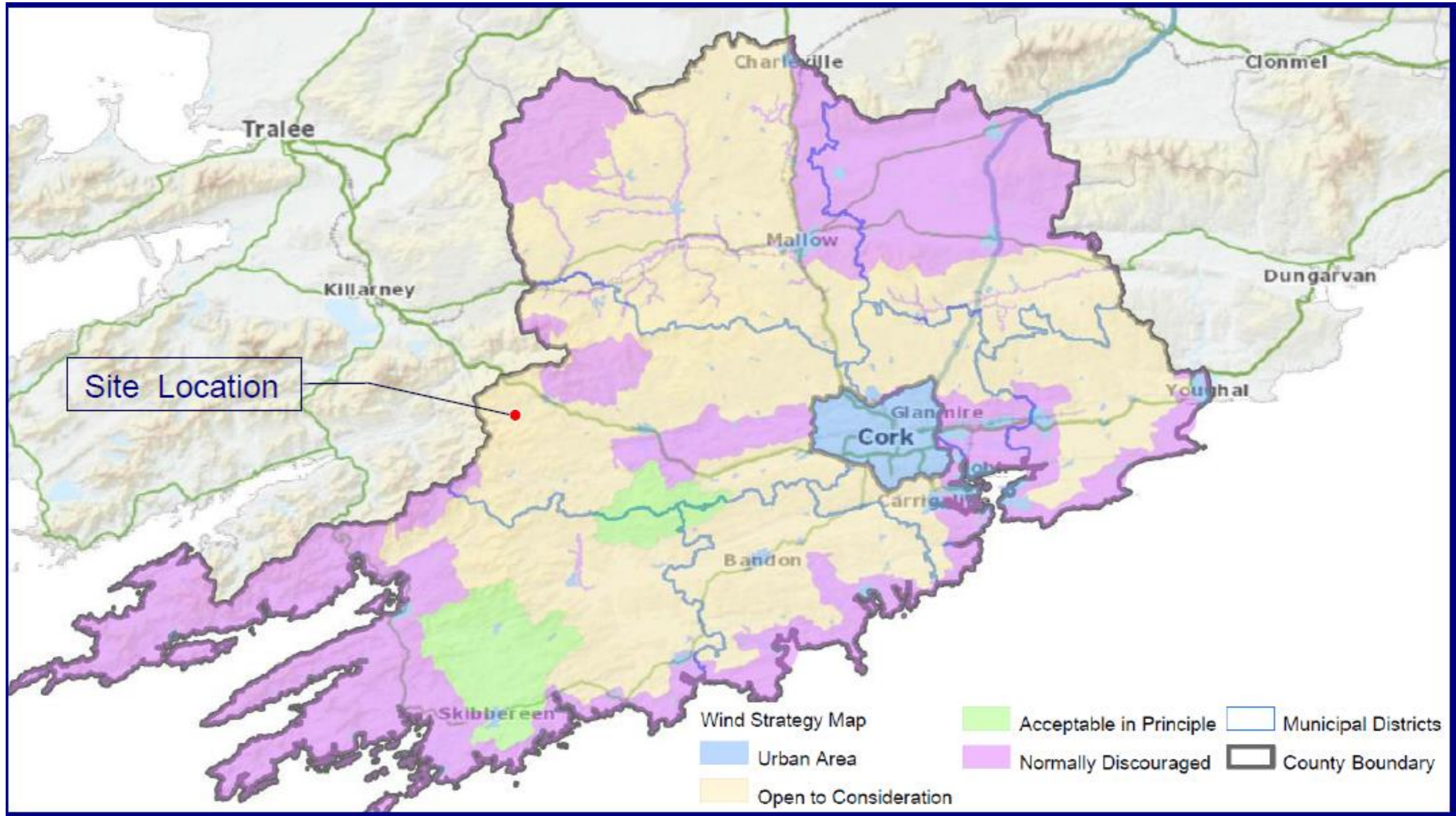


Figure 4.1: Wind Farm Designations (Map Extract Taken from The CCDP 2022-2028; Figure 13.3 – Wind Energy Strategy Map)

4.3 **The Kerry County Development Plan 2022 – 2028**

The Kerry County Development Plan 2022 – 2028 was adopted on the 7th July 2022. The plan recognises the critical importance of energy production and distribution to the continued development and expansion of employment in the county.

It states:

“The development of secure and reliable electricity transmission infrastructure is also recognised as a key factor for supporting economic development and attracting investment to the County. The Council supports the development of a safe, secure and reliable supply of electricity and to support and facilitate the development of enhanced electricity networks and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this plan under EirGrid’s (2017) Grid Development Strategy.”

Of particular relevance to the Development is Policy KCDP 12-1:

“Support and facilitate the sustainable provision of a reliable energy supply in the County, with emphasis on increasing energy supplies derived from renewable resources whilst seeking to protect and maintain biodiversity, archaeological and built heritage, the landscape and residential amenity and integration of spatial planning and energy planning in the county.”

The underground grid connection is located in County Kerry, this aspect of the Development contributes to this policy objective by enhancing the electrical grid network in the county.

County Kerry occupies a small segment of the central study area and at least one third of the wider study area, identified and assessed in Chapter 12; Landscape and Visual Amenity. Therefore, landscape designations in the current Kerry County Development Plan (CDP) have been considered.

A landscape review has been included as part of the Kerry County Development Plan 2022-2028. Within this, the landscape is classified by landscape types and landscape character areas. The parts of County Kerry located within the study area are predominantly contained within the landscape ‘Type A – Mountains’, ‘Type B – Pasture with Drystone Walls and Hedgebanks’ and ‘Type D – Coniferous Plantation’. The nearest and most relevant landscape character areas are ‘LCA 27 – Clydagh River, The Paps and the Derrynasaggart Mountains’ and ‘LCA 40 Bonane and Sheen River Valley’. Both of these landscape character areas have been classified with an overall sensitivity of ‘medium / high’. Chapter 112 Zoning & Landscape Environment’ of the current Kerry CDP contains one two relevant objectives under the heading ‘Landscape Protection’ Sensitivity’.

ZL-1KCDP 11-70: *Protect the landscape of the County as a major economic asset and an invaluable amenity which contributes to the quality of people’s lives.*

KCDP 11-71: *Protect the landscapes of the County by ensuring that any new developments do not detrimentally impact on the character, integrity, distinctiveness or scenic value of their area. Any development which could unduly impact upon such landscapes will not be permitted.*

The entirety of the landscape within County Kerry that falls within the central study area has been designated as 'Visually Sensitive Area'. This designation, covers much of the upland and coastal rural landscapes of the County. The remainder of the County is designated 'Rural General'.

There are numerous Co. Kerry designated views and prospects scenic designations within the study area (see Figure 12.2). Section 1211.6.4 5 of the current Kerry CDP pertains to Views and prospects.

It states:

"County Kerry contains areas of outstanding natural beauty which are recognised internationally. There is a need to protect and conserve views and prospects adjoining public roads throughout the County. These views and prospects are important to the amenity of the County and to its tourist industry"

Assessment of the CDP has found:

- In the central study area, there are no Co. Kerry designated view/prospects.
- 5-10km from the Site, there is one Co. Kerry designated view/prospect more than 7km, at its closest point, north of the location of the nearest turbine.
- 10-20km from the Site, there are four further Co. Kerry designated views/prospects, ranging from 11-19km from the location of the nearest turbine.

Wind Energy Strategy:

The Wind Energy Strategy in the closest portion of County Kerry to the site has been altered in the recently adopted 2022-2028 CDP. Areas that had previously not been subject to a specific wind deployment zone have now been designated as 'Open to Consideration' for wind energy development. These sit adjacent to existing wind energy areas that have been designated for 'Repowering'.

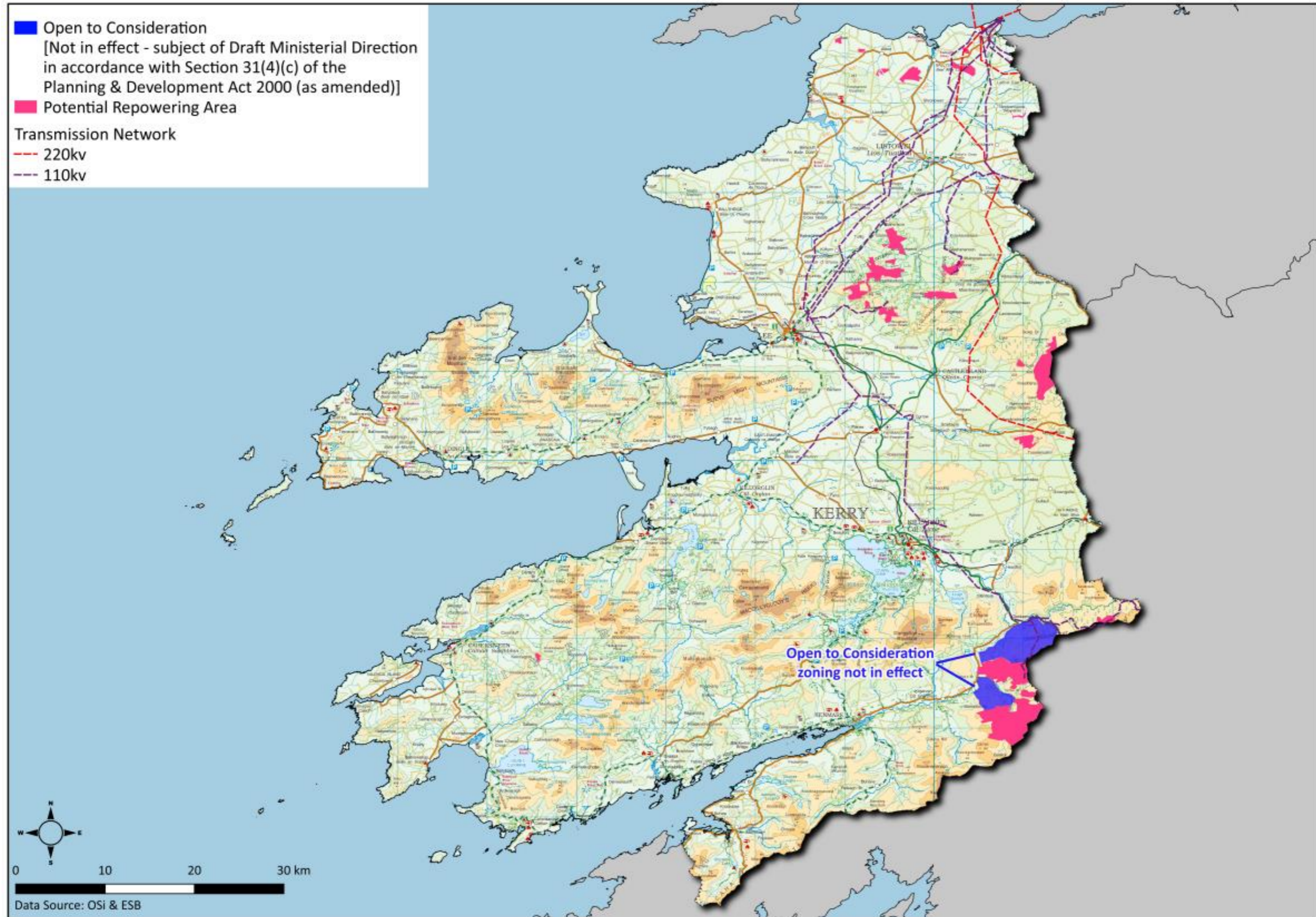


Figure 4.2: Kerry Wind Zoning Map (Map Extract Taken from The Kerry County Development Plan 2022-2028, Volume 4, Map5; Wind Zoning)

4.4 Conclusions

The Development's contribution of between 78.4-92.4 MW of renewable electricity to renewable energy targets while providing jobs, economic development and the community development fund would result in positive socio-economic impacts on the region, in line with the objectives of the CDP. The Development meets Cork and Kerry County Development Plans requirements for not having adverse impacts on the surrounding environment, including water quality, landscape, biodiversity or amenities. By utilising the newest and best turbine technology, the Development supports the growth of new and emerging renewable technologies. The Development meets the Cork CDP Wind Energy Strategy requirements of being in a suitable location and objectives relating to climate change, biodiversity, landscape, heritage, water management and environment. The closest portion of County Kerry to the Development is now designated as 'Potential Repowering Area' for wind energy development in the Kerry Wind Energy Strategy section of the CDP. It is in line with the 'Planning Guidelines for Wind Farm Development 2006' and 'Draft Wind Energy Development Guidelines 2019' as per the CDPs requirements, it is in line with Industry Best Practice and suitable community engagement has formed a key part of the design and planning phase of the Development. It is therefore considered to be fully in compliance with the objectives and policies set out in the in the CCDP.

5.0 MATERIAL PLANNING CONSIDERATIONS

5.1 Introduction

The planning application should be considered on the basis of the proper planning and sustainable development of the area and on the likely effects of the Development on the environment.

5.2 The National Interest and Strategic Importance

Through the review of policy in legislation and outlining of the needs case for the Development, it has been shown that the Development is firmly in the Irish national interest. Section 2.4 outlines how the Development will help Ireland to reach national targets, Section 2.5 outlines how the development is in line with regional planning policy and regional objectives on climate change mitigation and Section 3 outlines how the Development is in cognisance with the county level policies set out for renewable energy.

It will make a valuable contribution to climate change adaptation and greenhouse gas reductions as part of the global (see Section 2.2) and European (Section 2.3) efforts to combat climate change. The Development improves Irish energy security and reduce reliance on fossil fuels as outlined in Sections 2.4.1; National Energy Security Framework and in line with the RePowerEU Plan in Section 2.3.

Ireland is facing significant challenges in efforts to meet renewable energy and emissions targets and is falling behind in the longer-term movement away from fossil fuels, see Section 2.4. Ireland has one of the highest rates of importing fuel in Europe with imported dependency increasing to 72% in 2020 according to the SEAI²². Energy demand in Ireland has been growing and is expected to continue to increase, especially electricity demand which is expected to grow by 57% to 2028²³. Increases to the cost of carbon, supply issues and potential political insecurity increases fossil fuel price volatility. The high rate of imported fossil fuel dependency and the increasing demand for electricity make it vital to introduce more domestic renewable energy generation plants, such as the Gortyrähilly Wind Farm to provide reliable, secure and affordable energy supplies in Ireland.

Maximising the energy output of the Site with deployment of modern, efficient wind turbine technology, which is currently the cheapest form of new generation, will also contribute to reducing the cost of energy and benefit Irish consumers through lower energy prices.

The additional renewable energy that the Development will generate will help support Ireland's wider low carbon transition. It will help to meet the additional electrical demand that will be created by the electrification of the transport and heating networks and the growing tech industry installations such as data centres.

²² SEAI. (2021). ENERGY IN IRELAND. https://www.seai.ie/publications/Energy-in-Ireland-2021_Final.pdf

²³ EirGrid. (2018). EirGrid Forecasts Significant Increase in Electricity Demand <https://www.eirgridgroup.com/newsroom/gcs-2018/#:~:text=EirGrid%20Forecasts%20Significant%20Increase%20in%20Electricity%20Demand&text=According%20to%20EirGrid%20Group's%20All.between%2015%25%20and%2047%25.>

The construction of the Development will also positively contribute to the regional economy bringing investment and jobs that will help to support and retain confidence in the key regional industries of construction and renewable energy.

Wind Energy Ireland in their report on The Economic Impact of Onshore Wind in Ireland²⁴ produced **Figure 5.1** below which illustrates that the onshore wind industry in 2020 supported over 5000 jobs, by 2030 there is a potential to increase this to over 7000.

It also outlines the current benefits of onshore wind along with how far Ireland has to go to reach binding targets. Note that the installed capacity needs to nearly double within in a ten year period.

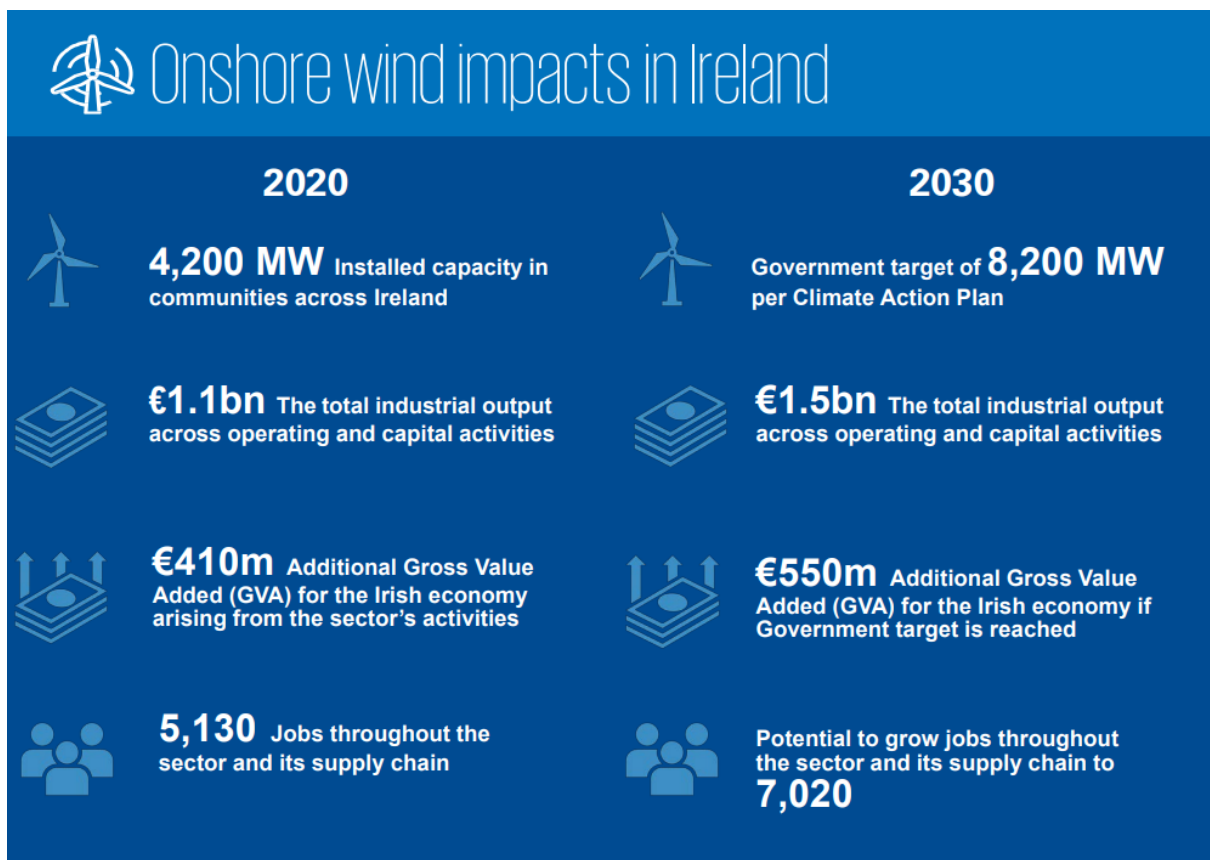


Figure 5.1: Onshore Wind Impacts in Ireland (From The Economic Impact of Onshore Wind in Ireland Figure 1.6)

By producing renewable wind energy, the proposed Gortyrhillly Wind Farm contributes towards moving Ireland closer to the target of 8,200 MW installed capacity wind energy by 2030 as of May 2022 this was 4.3 GW²⁵, leaving a shortfall of 3.9 GW to be achieved in the next 8 years, it creates jobs in the sector and increases additional gross value added to the Irish economy.

²⁴ WEI. (2021). The Economic Impact of Onshore Wind in Ireland <https://windenergyireland.com/images/files/economic-impact-of-onshore-wind-in-ireland.pdf>

²⁵ <https://windenergyireland.com/about-wind/facts-stats>

5.2.1 Sustainable Development and Policy Objectives of the Local Area

The Development proposal has been conceived and designed to align within the planning and sustainable development objectives of the local area. The success of this is documented in comprehensive detail through the EIAR and illustrated in **Table 4.1** which shows accordance with the provisions of the Cork County Development Plan.

The application documents and EIAR show that the Development provides an excellent opportunity to stimulate continued and additional investment and utilise a circular economic approach to maximise beneficial impact towards national targets, while also minimising the resulting environmental effects.

5.2.2 Implication for European Sites

The Natura Impact Statement (NIS) has considered the potential impacts of the Development on the integrity of 11 no. identified European sites. The Natura Impact Statement (NIS) prepared for the Application has shown that the Development is not likely to have a significant adverse effect on any European Site.

The NIS concludes on the best available scientific evidence that it can be demonstrated objectively that no elements of the project will result in a significant adverse effect on the integrity or on the Qualifying Interests/Special Conservation Interests of any relevant European site, either on their own or in-combination with other plans or projects, in light of their conservation objectives.

It is considered that this Natura Impact Statement provides sufficient relevant information to allow the Competent Authority (An Bord Pleanála) to carry out a Stage 1 AA Screening, and a Stage 2 Natura Impact / Appropriate Assessment, and to reach a determination that the proposed Development will not affect the integrity of any of the relevant European sites under Article 6 of the Habitats Directive (92/43/EEC) in light of their conservation objectives.

5.2.3 Renewable Energy Policy

The Development meets the objectives of Project 2040 as it will contribute to the economic, environmental, and social objectives of the NPF, in particular National Policy Objectives 54 & 55.

It is critical that a progressive approach is taken to development of wind farms in order to deliver the CAP21 objective of meeting an 80% share of electricity generated by renewables by 2030.

As a form of sustainable energy, with an output potential of between 78.4-.90.4 MW, the Development will contribute significantly to renewable energy targets and the strategy supported in The RSES for the Southern Region.

The Development's utilisation of the local resources to fuel further growth demonstrates how the Development will substantially contribute to the fulfilment of the Regional Spatial and Economic Strategy.

5.2.4 Key environmental considerations

- Landscape
- Biodiversity
- Residential amenity

5.2.4.1 Landscape

The Development is in an area designated as “Open to Consideration” for wind farms in the Cork County CDP landscape assessment.

The landscape and visual impact assessment (LVIA) in Chapter 12 of the EIAR assesses the impacts of the Development in relation to the Cork CDP.

Based on the findings of the collective assessments it is considered that the Development will not give rise to any significant effects, either singly or in combination.

There are a series of designated scenic routes (as per the Cork CDP) in close proximity to the proposed wind farm site and these wrap around the northern (S24), western (S25) and southern quarters (S26). These have been well covered by representative viewpoints in the visual impact assessment including ‘illustrative views’. The turbines tend to frame or lie in the opposite direction to these down-valley views. For these reasons and the details given in the landscape chapter, the Development has been assessed as being in line with the Cork County landscape policy as outlined in the CDP.

There are very few notable impacts at centres of population and along major routes, which are the receptor types that usually harbour the greatest numbers of receptors (people). Compared to many other wind energy developments, the effects on local community views, one of the more susceptible receptor types and closest to the development, are generally in the mid-range (Moderate and Moderate-slight) rather than highest end of the spectrum. This is less to do with the low population density and more to do with the enclosed nature of the rugged landscape in the central study area. It is also to do with the point that when broad elevated views are presented, they tend to be oriented away from high ground towards lower lying areas with the wind farm peripheral or even behind the viewer.

The most impacted receptor types were designated scenic routes, but for similar reasons as local community views, which were often represented by the same viewpoints in this assessment, the turbines may be close, but they are generally not in the direction of the view the route is designated for. Instead, they tend to frame or lie in the opposite direction to these down-valley views to the east and south.

Another receptor type that was proportionately more impacted than others in this study was the tourism, heritage and amenity views set. The mountain views from the Derrynasaggart and Mangerton

ranges to the north and northwest were the most impacted in a cumulative sense even though the proposed wind farm itself was only a minor contributor to the overall effect. Although there are partial and distant views of the proposed turbines adjacent to existing turbines when viewed for the ridge above Gougane Barra, there are no views of turbines from the iconic lakeshore overlooking the island of St Finbarr's Oratory.

5.2.4.2 Biodiversity

The Cork CDP's renewable energy objectives are in line with National and European policy in terms of promoting renewable energy that is suitably located and that has demonstrated that it will not have adverse impacts on the surrounding environment including biodiversity. The Climate Action and Low Carbon Development Act 2021 Places on a statutory basis a 'national climate objective', which commits Ireland to pursue and achieve no later than 2050, the transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy. By contributing to the decarbonization of energy supply by generating renewable energy and the environmental benefits this brings, the Development assists Ireland in reaching this goal.

The Development will result in the loss of 28 ha of wet heath, which includes areas of dry heath, outcropping silicious rock and some blanket bog (all Annex I listed habitats) – this effect is considered Significant and of Permanent duration. With implementation of mitigation that includes minimisation of the works footprint, measures to time specific works to avoid disturbance or potential direct mortality of species (such as common lizard), measures to avoid downstream pollution and habitat restoration and enhancement measures, as described in Chapter 5 of the EIAR, the significance of the effect will be reduced to moderate or slight.

Based on the likely extent of habitat loss throughout the wind farm site, the potential impact to the local population of Kerry Slug, is likely to be minor and localised as only a small proportion of suitable Kerry Slug habitat within the site will be impacted.

The Development will entail the crossing of seven small watercourses along the access track network. The watercourses are all minor streams with limited fisheries value, though the downstream catchments are of significant value for salmonids as well as supporting populations of the Annex II listed Freshwater Pearl Mussel. However, the mitigation measures described in Chapter 6 Aquatic Ecology, the EMP and WQMP are aimed at avoiding any deterioration in water quality during the construction phase. Subject to their successful implementation, there is considered to be no significant risk of a deterioration in water quality associated with the proposed Development.

Whitetail eagle, an Annex I and Red list species, have been observed on the site. While the Site does not offer potential nesting sites to eagles, foraging birds could be attracted to the site to feed on carrion and/or to roost in conifers (though the conifers on site are considered mostly unsuitable as the eagles prefer very large and often well-spaced specimens). The mitigation will comprise proactive measures to discourage eagles from the Site, in association with a bird monitoring programme. With mitigation

measures as presented in this report implemented in full, and specifically construction phase mitigation for breeding birds of peatland habitats, as well as measures for White-tailed Eagle (as required) during operation phase, it is considered that the significance of the predicted effect on birds as a result of the Development will be minimal.

Overall, the EIAR sets out that the ecological impacts arising from the development can be satisfactorily mitigated. A Habitat Management Plan has been developed that will provide ecological conservation of the Site for the long term. It will manage implementation of a range of steps, positively influencing biodiversity of the Site. This is fully assessed in Chapter 5: Terrestrial Ecology, Chapter 6: Aquatic Ecology and Chapter 7: Ornithology. The findings demonstrate that the environment can accommodate the Development without giving rise to significant biodiversity impacts in line with the Cork CDP objectives as well as regional, National and International Policy.

5.2.4.3 Residential Amenity

A significant minimum separation distance from all occupied dwellings of 750m has been achieved with the Project design. There are 16 No. occupied dwellings within 1km of any proposed wind turbine location. The shadow flicker assessment has identified the potential for shadow flicker to affect a number of receptors within the shadow flicker study area. This will be mitigated using a shadow control system, installed on all turbines to eliminate the potential for shadow flicker from the Development.

This brings the development in line with the DoEHLG Guidelines limit (30 hours per year or 30 minutes per day). The Development can be brought in line with the requirements of the 2019 draft guidelines, should they be adopted while this application is in the planning system, through the implementation of the mitigation measures outlined herein. The distance to occupied dwellings means that Guidance noise limits will be readily met.

5.3 Land Use and Nature Conservation

The Development Proposal is within an area identified in the Cork County Development Plan 2022-2028 as 'Open to Consideration', for wind energy as detailed in policy ED 3-5 and identified in **Figure 4.1**.

The Development has been designed with recognition of the existing sensitivities and the use of best practice methods, mitigation and the application of beneficial ecological measures as outlined in the Habitat Management Plan shall ensure that the Development will result in no significant adverse effects ensuring that the conservation value of the wind farm site shall be maintained and well-kept for many years to come.

5.4 The Development as Sustainable Development

The Development could not be a better example of sustainable development, enshrined in the National Planning Framework. There are three facets to sustainable development which are economic, social and environmental. The Development meets each of the three facets of sustainable development.

Table 5.1: The Development as Sustainable Development

Sustainability Role	²⁶ The three facets of sustainable development are economic, social and environmental. Sustainable Development can be defined as “ <i>Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.</i> ”
Economic Role	<p>The Development provides the opportunity to reinforce the existing local renewable energy industry knowledge and skills base by providing new jobs in the industry, providing the stability and diversity to the rural economy that can stimulate further development by attracting new business to the region due to the improved supply of electricity, enabling diversification. The Development will have a positive economic impact with several Irish firms commissioned to work on the design, environmental assessment and planning.</p> <p>The Development represents a strategically significant investment in the locality</p>
Social Role	<p>The influence of the Development to the de-carbonisation of the Irish electricity network will contribute positively to an issue of strategic social importance. This is illustrated by the Climate Action Plan 2021 which sets an 80% target for electricity production from renewable sources by 2030 and highlights the need to remove barriers to the development of renewables, including onshore wind, such as streamlining regulation and encouraging reinforcement of the grid to facilitate greater renewables penetration. The significance of the action plan is further underlined by the Irish government’s recent declaration of a climate emergency.</p> <p>The establishment of a local community benefit fund can play a valuable role by providing resources to help the local community achieve their social objectives As well as the project’s contributions to reducing CO2 emissions and helping to avoid the negative environmental effects associated with climate change.</p>
Environmental Role	<p>The Development has been assessed by the EIA process in terms of its impact on the environment, where impacts have been identified, the design has been amended and mitigation implemented to avoid, prevent and reduce adverse impacts and maximise positive impacts.</p> <p>Approximately 100,994 tonnes of carbon dioxide will be displaced per annum by the Development. Over the proposed 35-year lifetime of the wind farm, 3,534,791 tonnes of carbon dioxide will be displaced from traditional carbon-based electricity generation. This helps to mitigate climate change and will have a positive impact on the environment.</p>

5.5 Summary of Material Planning Considerations

All planning applications have to be determined on their individual merits with due consideration given to the overall planning balance of a scheme. While many development proposals will encompass both positive and negative aspects that require consideration, planning weight should air on the side of a ‘presumption in favour of development unless material considerations indicate otherwise’ as per the paragraph 11 of National Planning Framework.

The Development contributes to supplying the national demand for renewable energy, which in the context of the ongoing climate emergency is an urgent Irish national priority.

²⁶ Bruntland Report 1987

It is also shown that the Development is likely to provide a multi-million euro benefit to both the Irish and local economies.

Environmental Impacts have been considered by the EIA and through the process of assessment, embedded mitigation, and additional proposed mitigation outlined in the EIAR, NIS, CEMP and Habitat Management Plan it has been shown that the Development can be constructed and operated without significant effects arising demonstrating the acceptability of the proposal.

This Planning statement outlines how the Development is compliant with International, European and National policy on energy security, emissions reductions and renewable energy production. It reviews policy for the southern region and local Cork and Kerry county policy and finds the Development is in line with key renewable energy, landscape and environmental policy objectives. The Development also meets the definition of Sustainable Development as defined by the National Planning Framework in terms of the three sustainability pillars; Economy, Environment and Social.

6.0 CONCLUSION

In accordance with The Planning and Development Act 2000, as amended, this Planning Statement has assessed the Application against the provisions of the CCDP, and relevant material considerations. The Development contributes to supplying the demand for renewable energy, which in the context of the ongoing climate emergency is an urgent Irish national priority that must be given significant weight given the wealth of supporting national and international policy.

Ireland faces significant challenges to its efforts to meet EU targets for renewable energy by 2030 and its commitment to transition to a low carbon economy by 2050. The Irish government has committed to increasing the share of renewables electricity up to 80% by 2030 and allocating around 15.5 GW of wind.

Achieving 80% renewable electricity by 2030 will involve phasing out coal- and peat-fired electricity generation plants, increasing our renewable electricity, reinforcing our grid (including greater interconnection to allow electricity to flow between Ireland and other countries), and putting systems in place to manage intermittent sources of power, especially from wind.

The Development will sustain and build upon a contribution (78.4-92.4 MW) towards Ireland's legally binding targets for reductions in CO₂ and producing energy from native and renewable resources.

Based on the findings of the accompanying EIAR and the assessment of the Development's compliance with the relevant policies of the County Development Plan, and compliance with the relevant regional planning policies and relevant guidance, it is concluded that the Development fully accords with the National Planning Policy, Regional Planning Policy and the County Development Plan hierarchy.

The development process adopted by the Applicant has represented a best practice approach to a renewable energy scheme design, minimising the potential impact of the through multiple design iterations and modifications to minimise the impact on the receiving environment, and ensure compliance with the suite of planning policy. The layout of the Development presented in the Planning Application and EIAR represents the optimum fit with the technical and environmental parameters of this project.

The embedded mitigation, and additional proposed mitigation outlined in the EIAR, CEMP and Habitat Management Plan are considered to adequately mitigate the potential environmental effects predicted.

Having regard to the energy targets set out in the Climate Action Plan 2021, local and regional planning policy and guidance presented and assessed within this Statement, it is imperative that renewable energy developments which are acceptable in planning policy terms, such as the proposed Development, are given consent.

The Climate Action Plan follows the Climate Act 2021, which commits Ireland to a legally binding target of net-zero greenhouse gas emissions no later than 2050, and a reduction of 51% by 2030. These targets are a key pillar of the Programme for Government.

The proposed Development supports the doubling of onshore wind energy in Ireland by 2030 and contributes to the nation's target increase of renewable energy from 30% to 80% by 2030 as set out in the Climate Action Plan 2021.

The Applicant therefore respectfully requests that consent is granted subject to appropriate planning conditions.