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2.0 PLANNING POLICY

2.1 Introduction

- 2.1.1 This chapter of the Environmental Impact Assessment Report (EIAR) provides a brief overview of national, regional and local planning policy that is relevant to the Proposed Development. Before addressing the relevant planning policy, it also provides, by way of context, an overview of relevant national energy policy.
- 2.1.2 For a more detailed consideration of the proposal against applicable planning policy, please refer to the Planning Statement (PS, 2023) produced by Gravis Planning which accompanies the application.

2.2 National Policy

Ireland's Transition to a Low Carbon Energy Future 2015-2030

- 2.2.1 The Government White Paper entitled 'Ireland's Transition to a Low Carbon Energy Future 2015-2030' set out a framework to guide Ireland's energy policy development over the period 2015-2030. The framework takes account of European and international climate change objectives.
- 2.2.2 The 'Energy Vision 2050' established in the White Paper describes a 'radical transformation' of Ireland's energy system, which it is hoped will result in GHG emissions from the energy sector reducing by between 80% and 95%, compared to 1990 levels. This means that energy supply during the national transition to a renewable energy system will need to move away from carbon-intensive fuels such as peat and coal in favour of lower carbon fuels like natural gas. The White Paper notes that:

"Renewable energy will also play a central role in the transition to low carbon energy. No single renewable energy technology - existing or emerging - will alone enable Ireland to overcome the low carbon challenge. Rather, a diverse range of technologies will be required along the supply chains for electricity, heat and transport"¹.

"Onshore wind continues to be the main contributor (18.2% of total generation and 81% of RES-E in 2014). It is a proven technology and Ireland's abundant wind resource means that a wind generator in Ireland generates more electricity than similar installations in other countries. This results in a lower cost of support."²

"Several forms of RES-E, such as wind, solar and ocean energy are reliant on weather conditions and have an inherent variability. They cannot be dispatched in the same way as traditional generators and this presents challenges for the electricity system"³ (emphasis added).

¹ Department of Communications, Climate Action and Environment (DECC). (2015). *The White Paper: Ireland's Transition to a Low Carbon Energy Future 2015-2030*. (Para 103, Page 48)

² Department of Communications, Climate Action and Environment (DECC). (2015). *The White Paper: Ireland's Transition to a Low Carbon Energy Future 2015-2030*. (Para 128, Page 53)

³ Department of Communications, Climate Action and Environment (DECC). (2015). *The White Paper: Ireland's Transition to a Low Carbon Energy Future 2015-2030*. (Page 54)

*“Due to the variability of wind conditions, wind generation poses challenges to the operation of electricity grids. In Ireland, these challenges are being addressed by the electricity system operators under their DS3 programme”.*⁴

- 2.2.3 The DS3 programme’s stated aim is to “meet the challenges of operating the electricity system in a secure manner while achieving the 2020 renewable electricity targets”⁵. The Proposed Development will provide quick response capabilities to EirGrid as part of the DS3 Programme (‘Delivering a Secure, Sustainable Electricity System’). It will help to ensure that the grid network can continue to operate efficiently with the integration of variable renewable energy sources.

National Mitigation Plan 2017

- 2.2.4 The first ‘National Mitigation Plan’ (NMP) represents an initial step for Ireland on a pathway to achieve decarbonisation. It aims to lay the foundations for transitioning Ireland to a low carbon, climate-resilient and environmentally sustainable economy by 2050. It notes that there has been a positive correlation between the reduced share of high carbon content fuels in electricity generation, such as peat, coal, and oil, in relation to the rise in the relatively lower carbon natural gas and zero carbon renewables. This trend of resource consumption supports the NMP’s forecast that:

*“Between now and 2050 we [Ireland] will move from a centralised fossil fuel-based electricity system to a low carbon power system. Smart operation of the power system at both transmission and distribution level and energy efficiency will enable maximisation of the existing grid. Increased levels of renewable generation will be accompanied by the development of large-scale technology solutions, such as pumped storage and battery storage, together with demand response to complement the challenges posed”*⁶.

- 2.2.5 The NMP recognises that, as greater volumes of intermittent renewable electricity are connected to the grid, new measures and systems will be required in order to maintain grid security and stability.

National Planning Framework

- 2.2.6 ‘Project Ireland 2040 - National Planning Framework’, hereafter referred to as the NPF, is a 20-year planning framework designed to guide public and private investment, to create and promote opportunities for Irish citizens, and to protect and enhance Ireland’s built and natural environment.

- 2.2.7 The NPF notes that the population of Ireland is projected to increase by approximately 1 million people by 2040, which will result in a population of roughly 5.7million. This growth will place increased demands on both the built and natural environment as well as the social and economic fabric of the country, not least in terms of energy supply. In order to strengthen and facilitate more environmentally focused planning at the local level, the NPF states that future planning and development will need to:

“tackle Ireland’s higher than average carbon-intensity per capita and enable a national transition to a competitive low carbon, climate resilient and environmentally sustainable

⁴ Department of Communications, Climate Action and Environment (DECC). (2015). *The White Paper: Ireland’s Transition to a Low Carbon Energy Future 2015-2030*. (Para 128, Page 53)

⁵ <http://www.eirgridgroup.com/site-files/library/EirGrid/DS3-Programme-Brochure.pdf> (Page 2)

⁶ Department of Communications, Climate Action & Environment, (2017). *National Mitigation Plan*. July 2017 (Page 35)

*economy by 2050, through harnessing our country's prodigious renewable energy potential.*⁷

2.2.8 The NPF notes that Ireland's National Energy Policy is focused on three pillars:

- Sustainability;
- Security of Supply; and
- Competitiveness.

2.2.9 In line with these pillars, National Strategic Outcome 8 (Transition to Sustainable Energy) notes that, in creating Ireland's future energy landscape, new energy systems and transmission grids will be necessary to enable more distributed energy generation which connects established and emerging energy sources, i.e., renewables, to the major sources of demand. To facilitate this, the NPF acknowledges the need to:

*“Reinforce the distribution and transmission network to facilitate planned growth and distribution of a more renewables focused source of energy across the major demand centres.”*⁸

2.2.10 Some other key National Policy Objectives aimed at further achieving the transition to sustainable energy include:

- **National Policy Objective 52:** *The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation and the sustainable management of our natural capital;*
- **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 emission reduction; and*
- **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.*

2.2.11 The Proposed Development complements the national policy objectives around the creation of a lower carbon and more distributed energy generation system.

National Development Plan

2.2.12 The National Development Plan 2018 – 2027 (NDP) was introduced alongside the NPF and sets out the investment priorities that will underpin its implementation. It provides additional context for the assessment of projects such as that proposed. The NDP emphasises the need for investment in renewable energy sources, ongoing capacity renewal, and future technology that affords Ireland the opportunity to comprehensively decarbonise our energy generation.

⁷ *Project Ireland 2040 – National Planning Framework, DHPLG, February 2018*

⁸ *Government of Ireland, (2018). National Planning Framework. Project Ireland 2040 (Page 147).*

2.2.13 The NDP was updated in October 2021. The NDP's focus for investment in the energy network is to:

- *'ensure that it meets the challenge of integrating world-leading levels of renewable wind and solar electricity whilst ensuring security of supply; and*
- *ensure that it is fit for purpose in the medium- to longer-term in order to meet projected demand levels.*⁹

2.2.14 It emphasises that *'ensuring continued security of energy supply is considered a priority at national level and within the overarching EU policy framework'*¹⁰.

2.2.15 The NDP recognises that the target of delivering up to 80% of Ireland's electricity from renewable sources by 2030 will require investment in renewable electricity generation and storage **as well as** conventional electricity generation capacity to support the operation of variable renewable technologies and provide security of supply.

2.2.16 Strategic Investment Priority no. 4 aims to *'deliver circa 2GW of new conventional (mainly gas-fired) electricity generation capacity to support the operation of a predominantly wind/solar electricity system and provide security of supply for when variable electricity generation (wind/solar) is not sufficient to meet demand'*¹¹.

2.2.17 The Plan clarifies that much of the 2GW of new conventional (mainly gas-fired) generation capacity needed over the next 10 years will need to be delivered within the next five years to meet demand.

Policy Statement on Security of Electricity Supply (2021)

2.2.18 The Government's Policy Statement on Security of Electricity Supply (November 2021) sets out a number of updates to national policy in the context of Programme for Government commitments relevant to the electricity sector, planning authorities and developers. It seeks to ensure that continued security of electricity supply is considered a priority at national level.

2.2.19 The policy statement includes explicit Government approval that:

The development of new conventional generation (including gas-fired and gasoil/distillate-fired generation) is a national priority and should be permitted and supported in order to ensure security of electricity supply and support the growth of renewable electricity generation.

⁹ Department of Public Expenditure and Reform, (2021). National Development Plan 2021-2030 (Page 126)

¹⁰ Department of Public Expenditure and Reform, (2021). National Development Plan 2021-2030 (Page 125).

¹¹ Department of Public Expenditure and Reform, (2021). National Development Plan 2021-2030 (Page 125)

The Eirgrid/SONI Ireland Capacity Outlook 2022 - 2031

- 2.2.20 The latest all-Ireland Capacity Statement emphasises that the *“the current outlook, based on the best information available, is serious. It is likely that in the coming years we will experience system alerts and will need to work proactively to mitigate the risk of more serious impacts”*¹².
- 2.2.21 It predicts capacity deficits during the 10 years to 2031 and states that *“further new electricity generation will be required to secure the transition to high levels of renewable electricity over the coming decades”*. It is clear that this must include new gas-fired generation capacity: *“A balanced portfolio of new capacity is required and this includes the need for new cleaner gas fired generation plant”*¹³.
- 2.2.22 It also recognises that this is essential in order for Ireland to achieve its carbon budgets for the electricity sector up to 2030: *“This balanced portfolio is also crucial to ensuring Ireland meets its carbon budgets between now and 2030 for the electricity sector, which positions the electricity sector to achieve the zero net carbon target by 2050”*¹⁴.
- 2.2.23 Reflecting and building upon the commitments stated within the NDP, it states that we must deliver *“over 2000MW of enduring flexible gas-fired generation capacity”* by 2030¹⁵.

Climate Action Plan 2023

The Climate Action Plan 2023 (Published December 2022) sets out a 'roadmap' to achieve a net zero carbon energy system by 2050. It commits Ireland to aim for up to 80% of its electricity supply to be generated from renewables by 2030, with no generation from peat and coal.

- 2.2.24 To achieve Ireland’s targets under the Plan, a detailed sectoral roadmap setting out a range of measures and actions for each sector of the economy is included. For the electricity sector, the need for additional gas-fired generation capacity is clear. The Plan states that *‘rapid delivery of flexible gas generation is needed at scale and in a timeframe to replace emissions from coal and oil generation before the second budget period’* (i.e. 2026 – 2030)¹⁶.
- 2.2.25 Accordingly, the key measures for the sector include that *“The CRU and EirGrid will ensure an adequate level of conventional dispatchable generation capacity and deliver at least 2 GW of new flexible gas-fired generation”*¹⁷.

2.3 Regional Planning Policy

North-West Regional Assembly: Regional Spatial and Economic Strategy 2020-2032

- 2.3.1 The Regional Spatial and Economic Strategy (RSES) for the North-West region was adopted in 2020 and provides a high-level development framework for the region that supports the implementation of the NPF. It identifies ‘Five Growth Ambitions’ which aim to link strategic and operational challenges with prioritised capital interventions. One of these growth ambitions is ‘Infrastructure Ambition’, with the Strategy noting that the

¹² Eirgrid/SONI (2022), Ireland Capacity Outlook 2022 – 2031 (Page 4)

¹³ Eirgrid/SONI (2022), Ireland Capacity Outlook 2022 – 2031 (Page 5)

¹⁴ Eirgrid/SONI (2022), Ireland Capacity Outlook 2022 – 2031 (Page 5)

¹⁵ Eirgrid/SONI (2022), Ireland Capacity Outlook 2022 – 2031 (Page 6)

¹⁶ CAP23, Page 123

¹⁷ CAP23, Page 139

‘provision and maintenance of economic infrastructure, such as energy, water, and wastewater, are key to delivering compact growth and a connected, vibrant, inclusive, resilient and smart region.’¹⁸

2.3.2 The following ‘Regional Policy Objectives’ aim to ensure that the development of the electricity network is undertaken in a safe and secure way which meets projected demand levels, Government Policy and the need to achieve a long-term, sustainable and competitive energy future for Ireland:

- **RPO 8.1** - *The Assembly support the development of a safe, **secure and reliable** electricity network and the transition towards a low carbon economy centred on energy efficiency and the growth projects outlined and described in this strategy. (emphasis added)*
- **RPO 8.2** - *Support the reinforcement and strengthening of the electricity transmission network with particular reference to the regionally important projects contained within Table 11.*
- **RPO 8.3** - *The Assembly support the necessary integration of the transmission network requirements to allow linkages with renewable energy proposals at all levels to the electricity transmission grid in a sustainable and timely manner.*
- **RPO 8.4** - *That reinforcements and new electricity transmission infrastructure are put in place and their provision is supported, to ensure the energy needs of future population and economic expansion within designated growth areas and across the region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs. Ensure that development minimises impacts on designated areas.*

2.4 Local Planning Policy

2.4.1 This section describes the local development plan policies of relevance to the Proposed Development. Part II of the Planning and Development Act (2000) (hereafter referred to as ‘The Act’) requires that where, in making any determination under The Act, regard needs to be given to the local development plan, the determination must be made in accordance with the plan unless material considerations indicate otherwise.

2.4.2 The local development plan policy context is contained within the Galway County Development Plan (CDP) 2022-2028.

Galway County Development Plan 2022-2028

2.4.3 The Plan outlines the importance of having high quality energy infrastructure and also the importance of supporting the development of renewable energy sources in the interest of delivering on the National Climate Change Strategy and providing security of energy supply throughout the County and region. Chapter 7 of the Plan outlines the ambitions within the county to deliver infrastructure and utilities in a sustainable manner, recognising that this is of critical importance with regard to the future development of the county. Section 7.7 notes that a strong electricity infrastructure and transmission grid is *‘essential for the county in order to attract and retain high-tech industrial investment, to ensure*

¹⁸ Northern and Western Regional Assembly. (2020). Northern and Western Assembly Regional Spatial and Economic Strategy (RSES), (Page 32).

*competitive energy supplies, to achieve balanced development, to reduce dependency on fossil fuels, and to achieve climate change targets*¹⁹

2.4.4 The Plan states that is the policy objective of the Council *‘to work in conjunction with Eirgrid to protect existing electricity infrastructure, and to facilitate the timely delivery of new electricity infrastructure.*²⁰ Policy Objectives have been provided within the CDP to support this priority objective relating specifically to electricity and gas:

- **Policy EG 1 – Enhancement of Electricity Infrastructure** - *Support and promote the sustainable improvement and expansion of the electricity transmission and distribution network that supply the County, while taking into consideration landscape, residential, amenity and environmental considerations.*
- **Policy EG 2 – Delivery of Electricity and Gas Infrastructure** - *Support the provision and extension of electricity and gas transmission networks within the county which are critical to the economic development of the County subject to environmental quality, landscape, wildlife, habitats or residential amenity.*
- **Policy EG 3 – Power Capacity** - *To support and liaise with statutory and other energy providers in relation to power generation, in order to ensure adequate power capacity for the existing and future needs of the County.*
- **Policy EG 4 – Ireland’s Grid Development Strategy** - *Support the implementation of Ireland’s Grid Development Strategy, while taking into account landscape, residential, amenity and environmental considerations.*

2.4.5 Chapter 14 (Climate Change, Energy and Renewable Resource) of the Plan outlines the council’s ambitions to *‘reduce the carbon footprint by integrating climate action into the planning system in support of national targets, support indigenous renewable sources in order to reduce dependence on fossil fuels and improve security of supply and the move to a competitive low carbon economy*²¹. This section of the CDP states that is a strategic aim of the Council to *‘reduce the County’s CO₂ emissions by achieving international, national, regional and any local targets for achieving a low carbon economy by 2050’* and to reduce County Galway’s dependency on imported fossil fuels *‘and to provide alternative energy sources by harnessing the County’s potential for renewable energy sources while strengthening the grid transmission networks*²² (emphasis added). It sets out the following policy objectives for the county’s electricity and gas network:

- **Policy EG 1 – Gas Network and Generating Capacity** - *To support the development of the gas network and associated generating capacity in order to sustainably support and augment renewable electrical energy generated in County Galway.*
- **Policy EG 2 - Electricity Transmission Networks**
 - (a) *To support the development of the transmission grid network in order to sustainably accommodate both consistent and variable flows of renewable energy generated in County Galway.*
 - (e) *It is important that the necessary transmission and distribution infrastructure is facilitated and put in place in order to maximise the renewable energy potential of*

¹⁹ Galway County Council (2022), Galway County Development Plan 2022-2028, Page 223

²⁰ Galway County Council (June 2022), Galway County Development Plan 2022-2028 (Page 151).

²¹ Galway County Council (June 2022), Galway County Development Plan 2022-2028 (Page 263)

²² Galway County Council (June 2022), Galway County Development Plan 2022-2028 (Page 264)

County Galway. Liaison with Eirgrid, as a TSO, and alignment with their transmission plans and strategies will be of vital importance in this respect.

- **EG 3 Natural Gas and Synthetic Networks** - *To facilitate the delivery and expansion of the Natural Gas and Synthetic Gas infrastructure for storage, transmission and energy generation throughout the County for both domestic and business/industry use and to have regard to the location of existing gas infrastructure pipeline in the assessment of planning applications. (emphasis added)*

2.4.6 With reference to renewable energy generation, Policy RE7 states that it is an objective:

"To facilitate and support appropriate levels of renewable energy generation in County Galway, considering the need to transition to a low carbon economy and to reduce dependency on fossil fuels."

2.4.7 In meeting this objective the CDP (Section 14.8) recognises the need to ensure security of supply, noting that:

'With projected increases in population and economic growth, the demand for energy is set to increase in the coming years. A secure and resilient supply of energy is critical to a well-functioning economy, being relied upon for heating, cooling, and to fuel transport, power industry, and generate electricity.'²³ (emphasis added).

CDP Appendix 1: Local Authority Renewable Energy Strategy

2.4.8 To facilitate the sustainable growth of renewable energies a 'Local Authority Renewable Energy Strategy' (LARES) has been prepared for the county and is included in Appendix 1 of the CDP. Within the 'LARES' it is recognised that *'natural gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand.'*²⁴ It goes on to state that *'the gas network plays a key role as part of the supporting infrastructure for renewable energy developments.'*²⁵

CDP Appendix 4: Landscape Character Assessment

2.4.9 The Site is identified in 'Appendix 4 of the CDP 2022-2028: Landscape Character Assessment' as part of the Kilcrow Basin Unit, which falls within the wider 'Central Galway Complex Landscape'.

2.4.10 The character of the Kilcrow Basin is described as a *'working landscape, locally elevated. Larger areas of bog and forestry. Elevated concentrations of settlements and infrastructure'*²⁶.

2.4.11 In terms of landscape sensitivity, the area in which the Proposed Development is sited is designated as 'Low', which is defined as an area which is *'unlikely to be adversely affected*

²³ Galway County Council (June 2022), Galway County Development Plan 2022-2028 (Page 279)

²⁴ Galway County Council (June 2022), Galway County Development Plan 2022-2028 - Appendix 1: Local Authority Renewable Energy Strategy (Page 38)

²⁵ Galway County Council (June 2022), Galway County Development Plan 2022-2028 - Appendix 1: Local Authority Renewable Energy Strategy (Page 38)

²⁶ Galway County Council (June 2022), Galway County Development Plan 2022-2028 – Appendix 4: Landscape Character Assessment (Page 21)

*by change*²⁷. This marks a reduction in the sensitivity of the surrounding landscape in comparison with the 2015-2021 CDP which identifies it as 'Class 2 – Moderate'.

²⁷ Galway County Council (June 2022), Galway County Development Plan 2022-2028 – Appendix 4: Landscape Character Assessment (Page 22)