DYRICK HILL WIND FARM LIMITED

DYRICK HILL WIND FARM

CO. WATERFORD

PLANNING STATEMENT

May 2023

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DOCUMENT APPROVAL

PROJECT	Dyrick Hill Wind Farm	
CLIENT / JOB NO	EMPower	6497
DOCUMENT TITLE	Planning Statement	

	Prepared by	**Reviewed/Approved by**
Document **FINAL**	Name Justin Lohan Ryan Mitchell	Name Justin Lohan
Date May 2023	Signature	Signature

DYRICK HILL WIND FARM

PLANNING STATEMENT

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Statement of Authority

This Planning Statement has been prepared by Justin Lohan, Ryan Mitchell and David Kiely of Jennings O'Donovan & Partners Limited (JOD).

This section has been prepared by Mr. Ryan Mitchell and Mr. Justin Lohan of JOD. Mr. Mitchell has a Bachelors' Degree in Animal conservation and Biodiversity, has a strong proven background in ecology with 5 years' of experience working in the sector. He is experienced in report writing, EIA Report (EIAR) chapter writing and project management working on EIARs for wind farm developments in Ireland.

Mr. Lohan has a Bachelors' degree in Environmental Science and Technology. He also has almost 20 years' experience working in the construction and environmental sectors. He is experienced in report writing, EIAR chapter writing and project management working on EIARs for wind farm developments in Ireland

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 Dyrick Hill Wind Farm (the **Development**) will be an important 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 3,364,260 – 3,714,144 tonnes of carbon dioxide over the proposed 40-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 12 new turbines, grid connection and all associated works relating to the project.

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)' as amended, 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', require 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 2023 (CAP23) 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 2021.[1]. The target for installed wind energy capacity by 2030 is 9 GW. In May 2022 this was 4.3 GW[2], leaving a shortfall of 4.7 GW to be achieved in the next 7 years. The Development would contribute 78 - 93.6 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

In the aftermath of the Russian invasion of Ukraine and the ongoing conflict, the case for a rapid clean energy transition has never been stronger and clearer. In the lead up to the Russian invasion in 2022 the EU imported 90% of its gas consumption, with Russia providing more than 40% of the EU's total gas consumption. Russia also accounted 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 Directive[5];

- 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 into new renewable energy developments such as the Dyrick 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 recommendation [6] 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.** On the 22nd December 2022 the European Council formally adopts regulation[7] to speed up permits for renewable energy projects in all member states.

[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
[7] https://www.consilium.europa.eu/en/press/press-releases/2022/12/22/council-formally-adopts-regulation-to-speed-up-permits-for-renewable-energy-projects/#:~:text=The%20regulation%20introduces%20faster%20permitting,Council%20on%2024%20November%202022.

National Energy Security Framework

In response to the European Commission's REPowerEU action statement the Government of Ireland issued the National Energy Security Framework[8] in order 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 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 Dyrick Hill 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%[9] 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 CAP23 sets a target of increasing onshore wind to 9 GW by 2030, as of May 2022 this was 4.3 GW[10], leaving a shortfall of 4.7 GW to be achieved in the next 7 years. The Development would contribute 78 - 93.6 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-

[8] https://assets.gov.ie/221399/86cb99f5-58e3-4821-bc4c-e1bb1fa706fb.pdf
[9] https://www.epa.ie/our-services/monitoring--assessment/climate-change/ghg/energy-/
[10] https://windenergyireland.com/about-wind/facts-stats

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.

County Development Plan (CDP)

The Development is in an area designated as a "No Go" area for wind farm development in the Waterford CDP and the closest portion of County Tipperary to the Development is designated as an area 'Unsuitable for New Wind Energy Development".

However, The Development 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.

In summary, the Development:

- Contributes up to 72-86.4 MW of renewable wind energy to the national CAP21 target of 8.2 GW by 2030 helping to reduce the current 4.7 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
- Is 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 Waterford 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.
- Contributes to rural economic development in line with the Waterford CDP

Overall, it is considered that the Development is broadly in accordance with international, European and national policy. The Development's contribution of between 72-86.4 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 at a local level. The Development will also comply with the CDP requirements for not having adverse impacts on the surrounding environment in relation to water quality, 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 EMPower 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:

- Erection of 12 no. 6.0-7.2 MW wind turbines (Note* this is the current output available for turbines of this size. It is possible that with improvements in technology, the output may increase at the time of construction.) with an overall ground tip height of 185m. The candidate wind turbines will have a 162m rotor diameter and a hub height of 104m.
- Construction of Crane Hardstand areas and Turbine Foundations.
- Construction of new internal site Access Tracks and upgrade of existing site roads, to include passing bays and all associated drainage.
- Construction of a new wind farm site entrance with access onto the R671 regional road in the townlands of Lickoran.
- Improvement of existing site entrance with access onto local roads in the townlands of Broemountain.
- Improvements and temporary modifications to existing public road infrastructure to facilitate delivery of abnormal loads and turbine delivery.
- Construction of one Temporary Construction Compound with associated temporary site offices, parking area and security fencing.
- Development of on-site Borrow Pit.
- Installation of one Permanent Meteorological Mast with an overall height of 104m
- Development of a site drainage network.
- Construction of one permanent 110 kV Substation.
- All associated Wind Farm Internal Cabling connecting the wind turbines to the wind farm substation.
- All works associated with the connection of the wind farm to the national electricity grid, which will be via 110 kV underground cable connection approximately 16km in length to the existing Dungarvan 110 kV Substation.
- Upgrade works on the Turbine Delivery Route from Waterford Port.
- Ancillary forestry felling to facilitate construction and operation of the Development.

A 15-year planning permission and 40-year operational life from the date of commissioning of the entire wind farm is being sought.

A permanent planning permission is being sought for the Grid Connection and the 110kV 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.

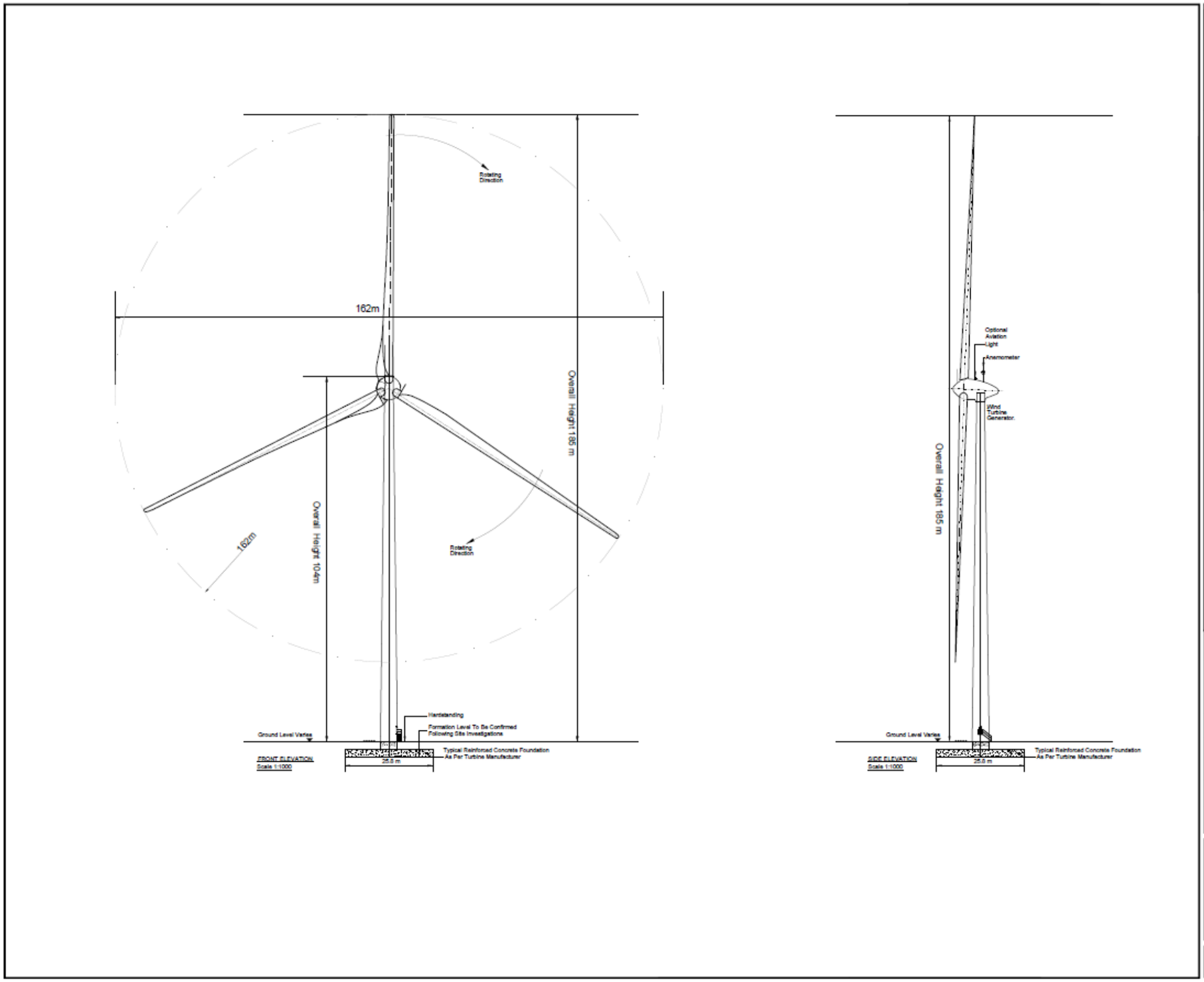


Figure 1.1: Candidate Turbine Dimensional Elevations

The Site

The Development is located within an agricultural, upland and forested landscape, between Coolagurtwee, and Ballynaguikee Co. Waterford. The Development is located 43 km west of Waterford City, 55km northeast of Cork City, and 12.9km northwest of Dungarvan. See **Figure 1.2.**

The Site extends to approximately 463 ha, and the principal land use in the general area is comprised of a mix of agricultural sheep and cattle grazing, farmland (managed pasture and open mountain heath) private commercial forestry and residential properties.

There are 112 Eircodes within 2km of the proposed turbines. A significant minimum separation distance from all occupied dwellings of 740m has been achieved with the Project design. With the exception of H92, which is in ownership of a financially involved third party and is located 710m from (T09). One building which, at the time of the application, is an occupied dwelling only has a separation distance of 320m. However, as this property will not be occupied from the commercial operational date therefore it has not been assessed as part of this EIAR See **Chapter 2: Development Description**.

Land Ownership

A portion of the Site lands are commonage land. The commonage lands comprise much of the open heath habitat land area of the Site and the applicant has entered into contracts with the participants in the commonage land area concerned. The remaining lands within the Site are 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 15-year planning permission and 40-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 110kV 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-312434-22 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 CDP, 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 (CO_2) emissions and, therefore, is relevant to renewable energy development.

The United Nations Framework Convention on Climate Change (UNFCC)[11] 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

[11] 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]

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.[12]

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 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 Agreement[10], 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).

[12] http://unfccc.int/essential_background/items/6031.php

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 Agency[13] 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 report[14] 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/EC[6], revised in 2018[11], which aims to make the EU a global leader in renewable energy and ensure that the targets of the final energy consumption being at least 16% renewables by 2020 and 27% renewables by 2030 are met. 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.

In May 2022, the commission published The "REPowerEU Plan[15]" which puts forward 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.

[13] https://www.iea.org/reports/renewables-2021
[14] https://www.irena.org/-/media/Files/IRENA/Agency/Publication/2022/Jan/IRENA_NDCs_RE_Targets_2022.pdf
[15] https://eur-lex.europa.eu/resource.html?uri=cellar:fc930f14-d7ae-11ec-a95f-01aa75ed71a1.0001.02/DOC_1&format=PDF

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 Directive[16].

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%[17] 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 recommendation [18] 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.

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***

[16] https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52022PC0222&from=EN
[17] https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Renewable_energy_statistics#Share_of_renewable_energy_more_than_doubled_between_2004_and_2020
[18] https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=PI_COM:C(2022)3219&from=EN

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 increased target in the Renewable Energy Directive and change of wording to "over riding public interest" underlines the vital nature of investments into new renewable energy developments such as Dyrick Hill 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 (NPF) The two relevant policies for consideration in the NFP are 54 and 55 as set out 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 location of the Development has been assessed as having suitable wind resources in line with this policy objective. The Development has been assessed against each of the topics contained in the EIAR and adverse residual environmental impacts are avoided . The findings of the EIAR and the NIS demonstrate that the Development is in 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 Framework[19] 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.
- 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.

[19] https://www.dccae.gov.ie/documents/Energy%20White%20Paper%20-%20Dec%202015.pdf

The framework highlights the impact of the Russian invasion of Ukraine on energy security, consumer price 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 Dyrick Hill Wind Farm, in securing Ireland's energy supply in light of the ongoing 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 reduction 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 - 2023

The Climate Action Plan 2021 - 2023 sets out a detailed sectoral roadmap designed to deliver a 51% reduction in net greenhouse gas (GHG) emissions by 2030 across all sectors of the Irish economy, incorporating a 75% reduction in greenhouse gas emissions in the Electricity sector alone. 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 reduce Ireland's dependence on imported energy.

The proposed Development will contribute to the de-carbonisation of the Irish electricity network by producing 72-86.4 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 (NECP) Plan[20] 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
3) Energy security
4) Internal energy market
5) Research, innovation and competitiveness

Key, relevant renewable energy objectives include:

- achieve a 34% share of renewable energy in energy consumption by 2030.

[20] https://energy.ec.europa.eu/system/files/2020-08/ie_final_necp_main_en_0.pdf

- 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). In 2020, just 42% of all electricity generated in Ireland came from renewable sources.
- 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 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.

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 reginal policy objectives (RPOs) are of particular relevance:

Table 3.1: Key Planning Policy Objectives from the RSES

RPO	Policy Details	Comment
RPO 96	***Integrating Renewable Energy Sources*** *It is an objective to support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate a renewable energy source and ensure our national and regional energy system remains safe, secure, and ready to meet increased demand as the regional economy grows.*	The Development includes an 110kV electrical substation which will become an asset of the national grid network and will make a meaningful contribution to electricity supply.
RPO 99	***Renewable Wind Energy*** *It is an objective to support the sustainable development of renewable wind energy (on shore and off shore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.*	The Development has the capacity to generate 72-86.4 MW of renewable wind energy.
RPO 100	***Indigenous Renewable Energy Production and Grid Injection*** *It is an objective to support the integration of indigenous renewable energy production and grid injection.*	The Development has the capacity to generate 72- 86.4 MW of renewable indigenous wind energy which meets the objective of RPO 100.
RPO 101	**International Hub for Energy Innovation** *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.*	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 Waterford County Development Plan 2022-2028 and the Tipperary 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 2020[21]) 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 - 2023 sets out a target for 80% electricity to come from renewable sources by 2030. In 2021 the percentage of electricity from renewable sources was 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 -23.

The CAP21 sets a target of increasing onshore wind to 8.2 GW by 2030. As of May 2022 this was 4.3 GW[22], leaving a shortfall of 3.9 GW to be achieved in the next 8 years. The CAP23 has increased the onshore wind installation target to 9 GW by 2030 and thus increased the shortfall from 3.9 GW to 4.7 GW to be achieved in the next 8 years. The Development would contribute 72 – 86.4 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.

[21] SEAI. (2021). ENERGY IN IRELAND. https://www.seai.ie/publications/Energy-in-Ireland-2021_Final.pdf
[22] https://windenergyireland.com/about-wind/facts-stats

4.0 DEVELOPMENT PLAN POLICY APPRAISAL

4.1 Introduction

The Waterford and City County Development Plan (WCCDP) 2022-2028 was adopted on Thursday 7th June 2022 and it came into effect on Tuesday 19th June 2022. The CCDP sets out the blueprint for development in the county.

4.2 Waterford City and County Development Plan 2022-2028 Assessment

The WCCDP underpins its visions and mains aims for the county by core quality of life principles. Those most relevant to the Development include Chapter 6 on Utilities Infrastructure, Energy and Communication, which promotes the following Strategic Objectives;

- To enable development in line with the capacity and provision of supporting infrastructure and utilities, and to require the timely provision of infrastructure needed for the sustainable development of lands consistent with the principle of infrastructure led development.
- To promote and facilitate the provision of energy efficient, low carbon infrastructure and utilities and support infrastructure, whilst supporting industry to innovate, decarbonising the energy sector in order to contribute to a national target of zero net emissions of greenhouse gases in Ireland by 2050.

The WCCDP outlines the importance of reliable energy supply and the growing energy demand in the county. Section 6.6 of Chapter 6 expands on the commitments of the county towards increasing renewable energy in line with national targets prescribed within the Climate Action Plan 2021. In terms of wind energy, Table 6.3 Renewable Energy Targets 2030 identifies an existing shortfall of 113.48MW of operational onshore wind generation versus the Climate Action Plan target of 8GW of onshore wind required for installation by 2030. This shortfall needs to be recalculated in light of the updated Climate Action Plan 2023 which now targets 9GW of onshore wind for installation by 2030. Using the same criteria specified in the WCCDP, based on County Waterford's land mass (2.64% of the Republic of Ireland) on a pro rata basis, County Waterford will need to deliver a total onshore wind energy capacity of 237.6 MW. At the time of publication, County Waterford has 62.87MW of operational onshore wind energy capacity and 34.85 MW of permitted, not yet operational, onshore wind energy. As a result, there is a current shortfall of 139.88 MW in consented onshore wind energy in County Waterford to deliver the 2023 Climate Action Plan target of 9GW on a national basis.:

The proposed development, by contributing 72 -86.4 MW, will assist Waterford City and County Council in meeting the existing shortfall in onshore wind energy of 113.48 MW set out in the current CDP and the more ambitious onshore wind energy targets enshrined in Climate Action Plan 2023.

The WCCDP 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 WCCDP.

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 WCCDP.

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 Waterford City and County Development Plan 2022-2028

Chapter	Policy Details	Development Policy Appraisal
1	**2.8 Core Strategy Policy Objective** *CS 09 ''**Low Carbon Future** Through the implementation of the Core and Settlement Strategies, we will put in place a pattern of land use and associated policy objectives and actions, which facilitate a just transition to a low carbon society''.*	The Development will make a significant contribution to facilitate an expedient transition to a low carbon society on a county level.
11	**Section 11.1 Energy** *a)* "*Energy consumption is responsible for 80% of total EU greenhouse gas emissions. To address this, Member States are required to significantly increase their use of renewable energies and to improve energy efficiency in all sectors. Renewable energy is also crucial to national energy security''.*	The Development will make a significant and meaningful contribution to renewable energy targets in the county. 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.
13	Renewable Energy Strategy for Waterford City & County 2016-2030 *''To provide a strategy to maximise Waterford's renewable energy potential and its transition to becoming a more energy secure, low carbon county in line with national energy targets whilst balancing the need to protect the environmental, social and heritage assets of the city and county.''*	The renewable energy strategy recognises the opportunity to benefit from increased renewable energy generation with limited additional environmental impacts and this is consistent with the findings of EIAR. 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. The Chapter concludes: "*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*."

Chapter	Policy Details	Development Policy Appraisal
13	ENV 04: Air and Energy ''We will contribute towards compliance with air quality legislation; greenhouse gas emission targets; management of noise levels; and reductions in energy usage.''	The Development meets the objectives set down in policy **ENV 04** by providing much needed renewable energy where there is a pressing need to meet the Government's ambitious 80% renewable electricity target by 2030 as set out in the Climate Action Plan 2023. In Chapter 10 Noise for the Development concludes The noise levels predicted at the nearest receptors are orders of magnitude below the level at which risk of hearing damage, or indeed negative health effects are possible. Noise during construction of the Development and decommissioning will be managed to comply with best practice, legislation and guidelines current at that time so that effects are not significant. In Chapter 16 Air & Climate for the Development concludes that There will be a positive, long-term effect in terms of helping Ireland meet its international obligations to reduce greenhouse gas emissions, air quality legislative requirements.
13	***6.6 Renewable Energy Targets 2030:*** *a) 'We will contribute towards compliance with air quality legislation; greenhouse gas emission targets; management of noise levels; and reductions in energy usage.''.*	The Development will add to Waterford 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. The development has been assessed for its impacts on the environment, including biodiversity, population and human health etc. It is therefore asserted that the Development supports WCCDP objectives.

Chapter	Policy Details	Development Policy Appraisal
	UTL 01 New Development and Strategic Development Growth Areas *Ensure that new development across the urban and rural settlements of Waterford is infrastructure led in a manner which:* *Supports communities and economic growth and development,* *Enhances environmental quality,* *Complies with the tiered approach to land use zoning which underpins the Development Plan.* *Encourages and provides opportunities to improve and implement sustainable modes of travel.* *Integrates nature-based solutions and climate change considerations into the design, planning, and implementation of infrastructure provision/ works and development proposals.* *Incorporates green infrastructure to provide for carbon offset and carbon sinks and wider environmental benefits, including providing shade to alleviate heat stress, supporting urban biodiversity, water retention and flood alleviation.* *Promotes and integrates energy efficiency and low carbon technologies and solutions; and,* *Ensures sufficient heat density (e.g. compact growth) and diversity of connected heat loads (egg hospital, leisure centre, large retail, electricity production, industry) to facilitate the economic provision, viability and integration/ implementation of low carbon heating technologies in development proposals*	Chapter 5 Population & Human Health outlines the Development economic benefits to the local economy. During the construction phase, there would be economic effects resulting from the expenditure on items such as Site preparation, Site Access Tracks, purchase and delivery of materials, plant, equipment, and components. Information provided by the Developer on experience at other wind farms indicates that there is expected to be a peak on site workforce of up to approximately 147 workers. Local employment will be provided, as well as employment on local, national and international levels both directly and indirectly. Throughout the project lifetime, employment will be both created on local, regional, national and international levels. Employees involved the construction of the Development will most likely use local shops, restaurants and hotels/accommodation. Therefore, overall, there will be a slight, positive impact on economic activity in the Region. It is envisaged that labour and materials will be sourced from the local area during construction where possible. Ready-mix concrete and crushed stone will also be sourced from a local supplier, again subject to authorisation, and to quality and quantity being available. Wind energy is an effective nature-based solution to help tackle climate change internationally. Dyrick Hill Wind Farm is estimated that 3upto 3,714,144 tonnes (higher range) of carbon dioxide will be displaced over the proposed 40-year lifetime of the wind farm. The development therefore supports WCCDP objectives.
	ULT 13: Renewable Energy *It is the policy of Waterford City and County Council to promote and facilitate a culture of adopting energy efficiency/ renewable*	Chapter 5 Population & Human Health outlines the Development economic benefits to the local economy. During the construction phase, there would be economic effects resulting from the expenditure on items

Chapter	Policy Details	Development Policy Appraisal
	energy technologies and energy conservation and seek to reduce dependency on fossil fuels thereby enhancing the environmental, social and economic benefits to Waterford City and County. It must also be recognised that other sources of electricity generation such as natural gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand. This will be achieved by: *Supporting the delivery of renewable energy to achieve the targets identified in Table 6.3 of the Development Plan.* *Facilitating and encouraging, where appropriate, proposals for renewable energy generation, transmission and distribution and ancillary support infrastructure facilities including the necessary infrastructure required for the development of offshore renewable energy developments developed fully in accordance with the Waterford Renewable Energy Strategy, the wind energy designation map (Appendix 2 of the RES), the Waterford Landscape and Seascape Character Assessment undertaken to inform this Development Plan, and the National Wind Energy Guidelines, or any subsequent update/ review of these.* *The Council recognizes and supports the role that the County can play in facilitating the onshore infrastructure required for the construction, operation and maintenance of offshore wind farm developments. This infrastructure includes but is not limited to: construction facilities, storage and lay-down areas, cable landfalls, onshore cable routing to substations, port and harbour infrastructure and coastal operations and maintenance bases,*	such as Site preparation, Site Access Tracks, purchase and delivery of materials, plant, equipment, and components. Information provided by the Developer on experience at other wind farms indicates that there is expected to be a peak on site workforce of up to approximately 147 workers. Local employment will be provided, as well as employment on local, national and international levels both directly and indirectly. Throughout the project lifetime, employment will be both created on local, regional, national and international levels. Employees involved the construction of the Development will most likely use local shops, restaurants and hotels/accommodation. Therefore, overall, there will be a slight, positive impact on economic activity in the Region. It is envisaged that labour and materials will be sourced from the local area during construction where possible. Ready-mix concrete and crushed stone will also be sourced from a local supplier, again subject to authorisation, and to quality and quantity being available. Wind energy is an effective nature-based solution to help tackle climate change internationally. Dyrick Hill Wind Farm is estimated that 3upto 3,714,144 tonnes (higher range) of carbon dioxide will be displaced over the proposed 40-year lifetime of the wind farm. The development conflicts with the most recent iteration of Waterford Renewable Energy Strategy - Wind Energy Designation Map. However, when the development site was selected during the feasibility selection process, the site was in an area '*Open to Consideration'* according to the Waterford City & County Council wind energy designations map 2016-2030. Chapter 11 of the EIAR for the Development, addresses the Landscape and Visual (L&V) impact. The landscape assessment concluded that the Development would not give rise to any significant landscape or visual

Chapter	Policy Details	Development Policy Appraisal
	as well as use, reuse or repowering of existing infrastructure where appropriate. *The Wind Energy Designation Map and the Landscape and Seascape Character Assessment Map identify different landscape character areas and associated landscape sensitivities. These designations encompass the concept of buffers between areas of sensitivity which vary across the different landscape character types and their different locations. These buffers allow for a gradual change between contrasting landscape sensitivities and associated wind energy designations to be considered, as necessary, when determining any development proposal.* *Promote and encourage the use of renewable energy, and low carbon resources, namely solar photovoltaic, geothermal, heat pumps, district heating, solar thermal, hydro, tidal power, offshore and onshore wind, biomass as well as micro-generation among business, agriculture, education, health, and other sectors.* *Promoting, encouraging, ensuring, and facilitating community engagement, participation and implementation of/ in renewable energy projects.* *Implementing, including in the Council's own activities and in the provision of services/ works, the use and integration of low carbon, renewable energy infrastructure and technologies.* *Supporting appropriate options for, and provision of, low carbon and renewable energy technologies and facilities, including the development and provision of district heating (and/ or other low carbon heating technologies); anaerobic digestion and the extraction of energy and other resources from sewerage sludge.*	amenity effects (including residential amenity). The EIAR L&V chapter also considered effects upon "views and prospects" included in the WCCDP. The findings demonstrate that the landscape can accommodate the Development without giving rise to significant effects. The development in therefore broadly supports the WCCDP objectives.

Chapter	Policy Details	Development Policy Appraisal
	The preparation and implementation of a Climate Action Plan (including adaptation and mitigation measures) for Waterford. *To support in conjunction with other relevant agencies, wind energy initiatives, both onshore and offshore, and wave energy, and onshore grid connections and reinforcements to facilitate offshore renewable energy development when these are undertaken in an environmentally acceptable manner.* *At initial design stage full consideration should be [given] to reasonable alternatives and existing infrastructural assets. In this regard environmental assessments should address reasonable alternatives for the location of new energy developments, and where existing infrastructural assets such as sub-stations, power lines and roads already exist within proposed development areas, then such assets should be considered for sustainable use by the proposed development where the assets have capacity to absorb the new development.* *All planning applications for Renewable Energy Projects such as wind farms and solar farms shall be accompanied by a Decommissioning and Restoration Plan (DRP) consistent with the Wind Energy Guidelines 2006 or any update thereof. Issues to be addressed shall include details of proposed restorative measures, the removal of above ground structures and equipment, the restoration of habitats, landscaping and/or reseeding roads etc.*	

Chapter	Policy Details	Development Policy Appraisal
13	***UTL 14 Energy Developments & Human Health*** *Proposals for energy development should demonstrate that human health has been considered, including those relating to the topics of:* *Noise (including consistency with the World Health Organisation's 2018 Environmental Noise Guidelines for the European Region developments must comply with the Wind Energy Development Guidelines (2006), or any subsequent update/ review of these),* *Shadow Flicker (for wind turbine developments, including detailed Shadow Flicker Study),* *Ground Conditions/Geology (including landslide and slope stability risk assessment),* *Air Quality; and,* *Water Quality.*	The Development is located in an area of the county which was previously 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. The Development has been assessed against each of the topics contained in The EIAR and adverse residual impacts are avoided. The planning application is accompanied by an EIAR and NIS which assess the potential impacts of The Development on the receiving environment and landscape. The EIAR submitted as part of the planning application has considered fully all the criteria listed under the following chapters: • 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: Noise • Chapter 11: Landscape and Visual Amenity • Chapter 12: Material Assets and Other Issues • Chapter 13: Cultural Heritage • Chapter 14: Traffic and Transportation • Chapter 15: Shadow Flicker & EMI • Chapter 16: Air and Climate 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.

Chapter	Policy Details	Development Policy Appraisal
		Landscape In Chapter 11 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 WCCDP. The findings demonstrate that the landscape can accommodate the Development without giving rise to significant effects. **Noise Impacts** The closest inhabited dwelling (H92) is located 710m from the nearest turbine. The impact of noise on building 320m from turbine 10 has not been assessed. A letter from the landowner confirming that the property will not be used as a residential dwelling for the duration of the commercial operation of the Wind Farm has been included in **Appendix 2.3**Chapter 10 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. **Archaeology** 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.

Chapter	Policy Details	Development Policy Appraisal
		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. The findings demonstrate that the environment can accommodate the Development without giving rise to significant impacts to cultural heritage. **Ecology** 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.
13	**BD 04: Appropriate Assessment** All projects and plans arising from this Plan [2] will be screened for the need to undertake Appropriate Assessment under Article 6 of the Habitats Directive. A plan or project will only be authorised after the competent authority has ascertained, based on scientific evidence, Screening for Appropriate Assessment, and subsequent Appropriate Assessment where necessary, that: The plan or project will not give rise to significant direct, indirect or secondary effects on the conservation objectives of any European site (either individually or in combination with other plans or projects); or The plan or project will have significant adverse effects on the integrity of any European site (that does not host a priority natural habitat type/and or a priority species) but there are no alternative solutions and the plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all	An Appropriate Assessment screening process has been undertaken and certain sites were screened and brought forward for Stage 2 AA in a Natura Impact Statement (NIS). A range of mitigation measures have been prescribed that, once implemented in full, will remove the risk of adverse effects posed by the proposed development to these qualifying features of interest. Based upon the information provided in this NIS, it is the considered view of the authors of the NIS that it can be concluded by the Board that the project will not, alone or in-combination with other plans or projects, result in adverse effects to the integrity and conservation status of European Sites in view of their Conservation Objectives and on the basis of best scientific evidence and there is no reasonable scientific doubt as to that conclusion.

Chapter	Policy Details	Development Policy Appraisal
	compensatory measures necessary to ensure the protection of the overall coherence of Natura 2000; or The plan or project will have an adverse effect on the integrity of any European site (that hosts a natural habitat type and/or a priority species) but there are no alternative solutions and the plan or project must nevertheless be carried out for imperative reasons for overriding public interest, restricted to reasons of human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of Natura 2000.	
	Construction and Environmental Management Plan Construction Environment Management Plans shall be prepared in advance of the construction of relevant projects and implemented throughout. Such plans shall incorporate relevant mitigation measures which have been integrated into the Plan and any lower tier Environmental Impact Statement or Appropriate Assessment. CEMPs typically provide details of intended construction practice for the proposed development, including: location of the sites and materials compound(s) including area(s) identified for the storage of construction refuse. location of areas for construction site offices and staff facilities. details of site security fencing and hoardings. details of on-site car parking facilities for site workers during the course of construction.	A Construction Environment Management Plan is provided in **Appendix 2.1** of the EIAR application. This meets the required County Council policy objective.

Chapter	Policy Details	Development Policy Appraisal
	details of the timing and routing of construction traffic to and from the construction site and associated directional signage. measures to obviate queuing of construction traffic on the adjoining road network. measures to prevent the spillage or deposit of clay, rubble or other debris. alternative arrangements to be put in place for pedestrians and vehicles in the case of the closure of any public right of way during the course of site development works. details of appropriate mitigation measures for noise, dust and vibration, and monitoring of such levels. containment of all construction-related fuel and oil within specially constructed bunds to ensure that fuel spillages are fully contained (such bunds shall be roofed to exclude rainwater). disposal of construction/demolition waste and details of how it is proposed to manage excavated soil, including compliance with 'Best Practice Guidelines for the preparation of Resource Management Plans for Construction & Demolition Waste Projects' EPA: 2021, (or any final updates thereof). a water and sediment management plan, providing for means to ensure that surface water runoff is controlled such that no silt or other pollutants enter local watercourses or drains. details of a water quality monitoring and sampling plan. if peat is encountered - a peat storage, handling and reinstatement management plan. measures adopted during construction to prevent the spread of invasive species (such as Japanese Knotweed). appointment of an ecological clerk of works at site investigation, preparation and construction phases. and	

Chapter	Policy Details	Development Policy Appraisal
	details of appropriate mitigation measures for lighting specifically designed to minimise impacts to biodiversity, including bats.	

The WCCDP includes Chapter 10 'Landscape, Coast/ Marine and Blue Green Infrastructure ', 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.

L 02: Protecting our Landscape and Seascape:

"We will protect the landscape and natural assets of the County by ensuring that proposed developments do not detrimentally impact on the character, integrity, distinctiveness or scenic value of their area and ensuring that such proposals are not unduly visually obtrusive in the landscape, in particular, in or adjacent to the uplands, along river corridors, coastal or other distinctive landscape character units."

A Landscape Character Assessment was undertaken as part of the Draft Waterford City and County Council Landscape Strategy (2022). This has been incorporated within the current WCCDP at Appendix 8. The Landscape and Seascape Character Assessment subdivides the counties landscape in to 7 landscape character types (LCTs) and a subsequent 28 landscape character units. The proposed Development straddles the border of both the 'Upland' and 'Foothills' landscape types and across both the landscape character units '6B – Knockmealdown Uplands' and '5C – Tooaneena Foothills'. The proposed Development is located across three sensitivity classifications – 'Most Sensitive', 'High Sensitivity' and 'Low Sensitivity'. The most elevated parts of the site to the west in the surrounds of the summit of Broemountain have been classified with the 'Most Sensitive' designation, whilst the less elevated eastern parts of the site are cloaked in a 'Low Sensitivity' designation. A small area classified with a 'High Sensitivity' is also located between 'Most' and 'Least' sensitive designation, however, it is unclear as to unclear as to why this area has been designated "High Sensitivity. (see **Figure 14.4**).

Guidelines in relation to each of these sensitivity classifications are outlined below.

- ***Most Sensitive*** *– Landscape Character Areas and features designated as Most Sensitive represent the principal features which create and sustain the character and distinctiveness of the surrounding landscape. To be considered for permission, development in or in the environs of these areas must be shown not to impinge in any significant way upon its character, integrity or uniformity when viewed from the surroundings. Particular attention should be given to the preservation of the character and distinctiveness of these areas as viewed from scenic routes and the environs of archaeological and historic sites.*
- ***High Sensitivity*** *– These areas have distinctive, homogenous character, dominated by natural processes. Development in these areas has the potential to create impacts on the appearance and character of an extensive part of the landscape. Applications for development in these areas must demonstrate an awareness of these inherent limitations by having a very high standard of site selection, site layout, selection of materials and finishes.*

- ***Low Sensitivity*** *– A large area of County Waterford is designated as a landscape of low sensitivity. These areas have potential to absorb a wide range of new developments subject to normal planning and development control procedures. In these areas the Planning Authority will have regard to general restrictions to development such as scenic routes, siting, road set backs, road widening plans, parking numbers, road and sewage disposal criteria.*
- ***Least Sensitive*** *– A small area of Waterford City and County is designated least sensitive to landscape change. These are areas of concentrated existing development and infrastructure. Appropriate new development in these areas can reinforce the existing desirable land use patterns. Regard shall be had to site development standards namely density, building lines, height of structures and design standards. The overall aim is to ensure that the inherent character of city/town environs and town and village centres is maintained.*

6B - Knockmealdown Uplands

Within the Waterford City and County Landscape Strategy (2022), '6B - Knockmealdown Uplands' is described as having:

- Landscape Value: High
- Landscape Sensitivity: Most Sensitive
- 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."

5C -Tooaneena Foothills

Within the Waterford City and County Landscape Strategy (2022), 5C -Tooaneena Foothills is described as having:

- Landscape Value: Medium
- Landscape Sensitivity: High sensitivity
- 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."

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

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

LS 04: Scenic Routes and Protected Views

"We will protect the scenic routes and specified protected views identified in our Landscape Character Assessment (Appendix 8), including views to and from the sea, rivers, landscape features, mountains, landmark structures and urban settlements from inappropriate development that by virtue of design, scale, character or cumulative impact would block or detract from such views.

In the central study area, there are 10 Co Waterford scenic routes, none of which traverses the Wind Farm Site:

- "Scenic Route SR2: The R668 north from Lismore and R669 north from Cappoquin.
- "Scenic Route SR3: Various third class routes heading north from the R666 through the Comeragh Mountains.
- "Scenic Route SR4: Third class route from the mouth of the Glendine River, crossing the River Bride and following the Blackwater north, turning west to Lismore.
- "Scenic Route SR5: From Youghal Bridge east along the N25 to Dungarvan.
- "Scenic Route SR6: North from Kinsalebeg to Clashmore on the R671, east at Clashmore along third class route to N25 at Gorteen.
- "Scenic Route SR7: East from Gorteen along third class route via Monamraher to the R674. East to Helvick (Heilbhic) Head, west to N25.
- ''Scenic Route' SR8: North-west from Dungarvan to Tooraneena on the R672. Third class North to Ballymacarbry. Join R671 to Clonmel taking the R678 and turning south for third class route through the Comeraghs.
- ''Scenic Route' SR10: Third class route through the Monavullagh Mountains from the R672 to Lemybrien.
- ''Scenic Route' SR11: Third class circular route off R672 to Kilgobnet.
- 'Scenic Route' SR22: Panoramic view over Dungarvan Harbour from N25 Layby at Barranalira.

Wind Energy Strategy

The current renewable energy strategy for County Waterford identifies the proposed development within an 'exclusion area', This is in stark contrast with the previous version of the Waterford Renewable Energy Strategy (formed part of the previous Waterford County Development Plan 2011-2017 (**Fig. 4.1**), which designated the Site and surrounding landscape as an area 'Open to Consideration' in relation to wind energy development. It is also worth noting that this wind energy designation transitions to a 'Preferred Area' wind energy classification less than 2.5km northeast of the Site.

The Site location for the Development was decided upon 2021 as the result of a feasibility study which analysed the surrounding environmental and other material factors. The site was deemed suitable on

the basis of multiple factors, including the previous County Development Plan - Wind Energy Designation Map 2016-2030 (See, Figure 4.2).

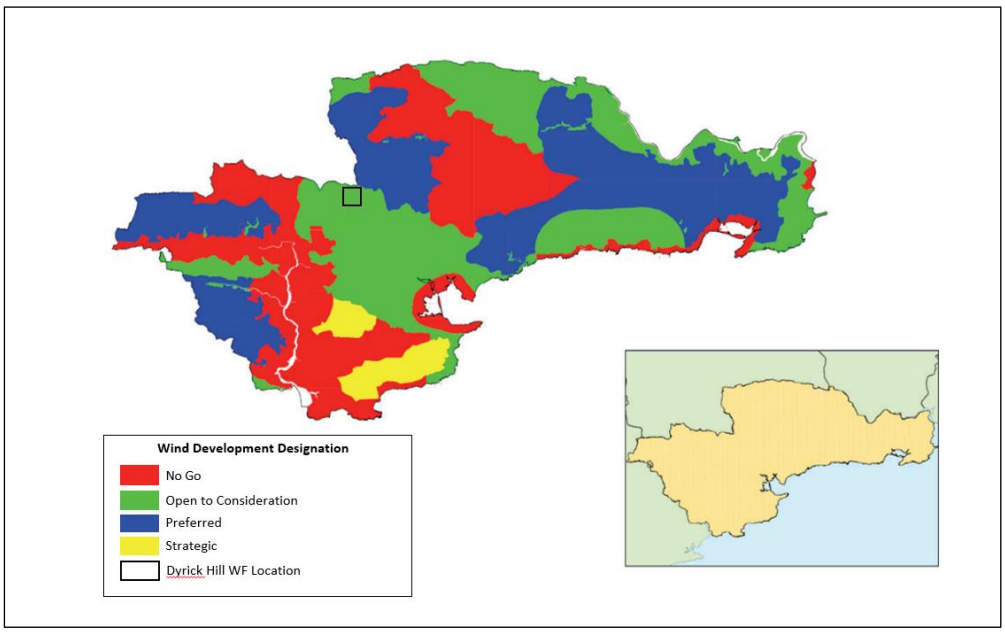


Figure 4.1: Waterford City & County Council Wind Energy Designations 2016-2030

The most recent County Waterford Renewable Energy Strategy is retained in **Appendix 2** of the WCCDP. It includes a sieve mapping analysis identifying the most suitable areas for wind energy development. The Site is within a broad area that is deemed to be a 'No go' area for wind energy development. See **Figure 4.2**.

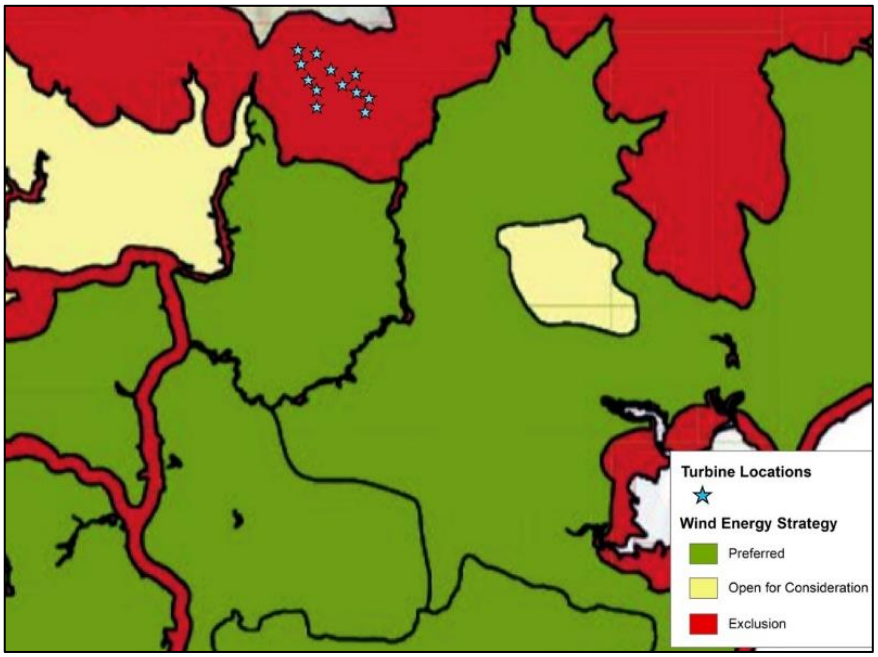


Figure 4.2: Excerpt from Appendix 2 of the current Renewable Energy Strategy showing updated wind energy classification areas in relation to the proposed development.

According to the Renewable Energy Strategy 'No go' area criteria, these areas have been identified by way of overlaying the following series of maps and data:

- The Landscape and Seascape Character Assessment (Appendix 8 of the Development Plan).
- Natura 2000 network.
- Urbanised areas.
- Waterford Regional Airport Masterplan (Appendix 12 of the Development Plan).
- Wind energy mapping of adjacent local authorities.
- Major road infrastructure.
- Transmission grid.

The development is located in an area with varying landscape sensitivities; Most Sensitive, High Sensitivity and Low Sensitivity are outlined in **Figure 4.3.** The Development as a whole is not located in an area designated as the most sensitive from a landscape and visual perspective according to the County Development Plan.

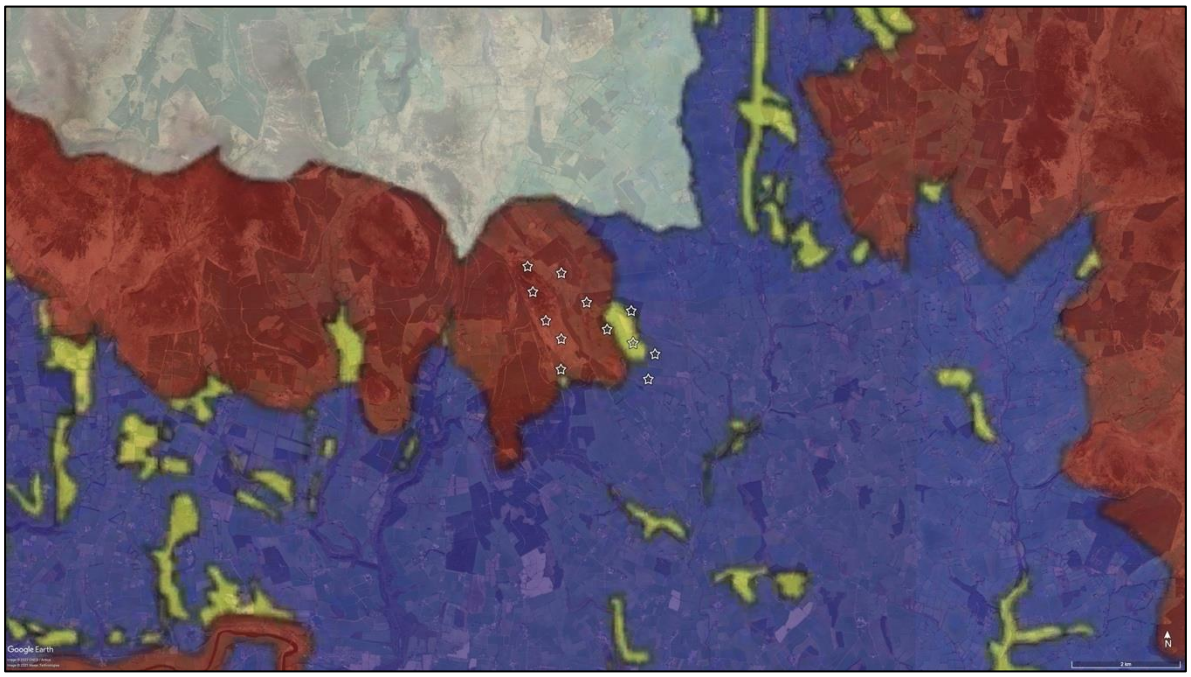


Figure 4.3 - Excerpt from the Current Waterford City and County Development Plan 2022-2028 map viewer showing landscape sensitivity classifications in relation to the proposed turbines (Red – Most Sensitive, Yellow – High Sensitivity, Blue – Low Sensitivity).

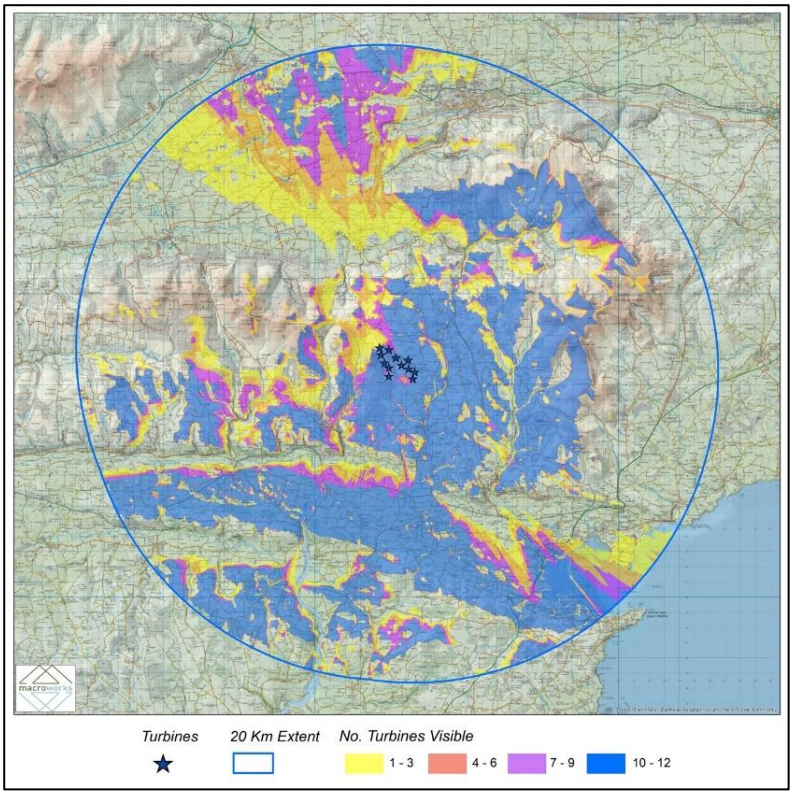
Under the "Wind energy mapping of adjacent local authorities' criteria the County Tipperary wind energy map, outlining the area north of the Site as being a "no go" area, is also a contributing factor for the immediate area within which the Site is located being assigned as an exclusion zone. It is difficult to discern how the methodology has been used to designate this immediate area as an exclusion zone by Waterford County Council. The areas do align as part of the recommendation from the Office of the Planning Regulator. However, utilising the adopted County Tipperary methodology

would not encompass the entire Site Development area in an area ''*not suitable for wind energy development"* as it assigned different sieve analysis criteria to determine its wind energy exclusion designation areas.

The following series of maps and data was used for Tipperary Wind Energy Map

- Wind Energy Policy Areas of Adjacent Local Authorities
- Wind Potential
- Landscape Sensitivity
- Electricity Transmission Network
- Settlement Pattern and Population Densities
- Scenic Routes and Landscapes and Amenity Designations.
- Landslide Susceptibility
- Ecological & Natural Heritage Designations (Areas within 1km buffer can be "Open for Consideration)

The only conflicting criteria in the Tipperary Wind Energy Map is the landscape sensitivity and Landscape designations. In Chapter 11 of the EIAR the zones of theoretical visibility (ZTV) maps show that The Development will not be visible from many views looking from the North/Northeast looking south/southwest across the Knockmealdown Mountain Mosaic which is designated as most sensitive in the Appendix I - Landscape Character Areas of Tipperary of the Tipperary County Development Plan **(Figure 4.4).** None of the remaining criteria is applicable to the development due to the location of the site.



44.4 Bare-ground Zone of Theoretical Visibility (ZTV) Map based on a turbine tip height of 185m. (See Volume III for larger scale map)

CHIEF EXECUTIVE'S REPORT ON PROPOSED MATERIAL ALTERATIONS TO DRAFT PLAN CONSULTATION

WFD-C3- 170

''The submission highlights that the proposed wind energy map results in an overall decrease in area for potential wind energy developments. It states that this is particularly problematic in the areas of transitional farmed and forested foothills landscapes. These areas host wind farms across the country and indeed in Waterford, proving well suited for such developments. The submission requests that the Council revise the wind energy map to ensure appropriate land designations have been provided to align with the requirements of the CAP 2021.''

Chief Executive Response

"With regards to the comments in the submission in relation to eliminating wind farm development on peat soils based on Carbon release, irrespective of the condition of the peatland it is considered from a biodiversity perspective Waterford peatlands are recognised for their range of ecosystems services from carbon capture to water retention and biodiversity for flora and fauna. This is identified through the range of nature conservation designation applied to peatland sites from the Comeragh Mountains SAC to Wetlands of National Importance at Knockmealdown, Boghaghbaun, Boggaghduff, Bohernagore West, Curraghdyrick Lower, Glenaknockaun East, Glenaknockaun West, Knockanask and Tooraharaheen and wetlands of regional importance e.g. Monyarha Bog as surveyed in 2015 and listed for protection in Appendix 11 of the Draft Development Plan. These areas comprise wet and dry

heath and blanket bog habitats and as per biodiversity policies contained in Chapter 9 of the Draft Development Plan and environmental objectives contained in the SEA Environmental report the facilitation of wind energy development in these areas would represent policy divergence from these objectives for biodiversity in the plan."

In Chapter 8 of the EIAR the Site area has been demonstrated to contain no peat deposits. Accordingly, no peat slide risk assessment was required to be undertaken. The average soil depth across the site is approximately 10cm, predominantly comprised of mineral soils. The Chief Executive's Response referenced here outlined t that conservation designation applied to peatland sites within the Knockmealdown mountain range. However, the Dyrick Hill wind farm Development is not located on any peatland habitats on Site.

The Development will not have any impact on any peatland site, this rational for the "no go" area from a biodiversity perspective is not applicable in this instance.

Policy ULT13: Renewable energy (WCCDP Policy)
"The Wind Energy Designation Map and the Landscape and Seascape Character Assessment Map identify different landscape character areas and associated landscape sensitivities. These designations encompass the concept of buffers between areas of sensitivity which vary across the different landscape character types and their different locations. These buffers allow for gradual change between contrasting landscape sensitivities and associated wind energy designations to be considered, as necessary, when determining any development proposal."

Based on the landscape, visual and cumulative assessment which can be found in Chapter 11: Landscape and Visual Amenity, it is considered that there will not be any significant effects arising from the proposed Dyrick Hill Wind Farm and the Development. This has been assessed in conjunction with the WCCPD and the location of the Development within a sensitive area as outlined in the WCCDP.

Under section 37G(2)(c), the Board is required to consider the provisions of the development plan or plans for the area. However, as per section 37G(6) the Board can still grant permission for a development which materially contravenes the WCCDP: *"the Board may decide to grant a permission for development, or any part of a development, under this section even if the proposed development, or part thereof, contravenes materially the development plan relating to any area in which it is proposed to situate the development."*

4.3 The Tipperary County Development Plan 2022 – 2028

The Tipperary County Development Plan 2022 – 2028 (TCDP) was adopted on 22nd August 2022. The plan recognises the critical importance of energy production and distribution to the continued development and expansion of employment in the county.

Of particular relevance to the Development is Policy TCDP 15-F:
"*Work in partnership with the Department of the Environment, Climate and Communications in line with their 'Policy Statement to Ensure Security of Electricity Supply and Facilitate the Target of up to 80% Renewable Electricity Generation by 2030', and to facilitate additional electricity transmission and distribution grid infrastructure, as well as additional electricity interconnection and electricity storage*."

While, the entirety of the Development is contained in Waterford County however, it sits immediately adjacent to the County Tipperary Border. Therefore, it is important to include neighbouring landscape designation. These have been identified and assessed **in Chapter 11: Landscape and Visual Amenity**. The landscape designations in the current TCDP have been considered.

A landscape review has been included as part of the TCDP. Within this, the landscape is classified by landscape types and landscape character areas. The parts of County Tipperary located within the study area are predominantly contained within the landscape 'D1 – Mountain & Upland'. The nearest and most relevant landscape character areas are '23 -Knockmealdown Mountain Mosaic. The landscape sensitivities range from 'transitional sensitivity' to 'vulnerable'.

Volume 3: Appendix 3 'Landscape Characters Assessment and Schedule of Views and Routes' of the current TCDP contains relevant objectives under the heading 'Landscape Protection Sensitivity'.

Planning Policy 11-17: "*Ensure the protection of the visual amenity, landscape quality and character of designated 'Primary' and 'Secondary' amenity areas. Developments which would have a significant adverse material impact on the visual amenities of the area will not be supported. New development shall have regard to the following:*

a) Developments should avoid visually prominent locations and be designed to use existing topography to minimise adverse visual impact on the character of primary and secondary amenity areas.
b) Buildings and structures shall integrate with the landscape through careful use of scale, form and finishes.
c) Existing landscape features, including trees, hedgerows and distinctive boundary treatment shall be protected and integrated into the design proposal."

In the central study area, there are 3 Co Tipperary scenic views, none of which traverses the Wind Farm Site:

- *View 17*: Views south along Ardfinnan - Clogheen road (R665)
- *View 37*: Views South over River Suir Valley from Marlfield - Knocklofty Road
- *View 38*: View on the Cahir approach road to Clonmel looking southeast to lands north of Marlfield and west of the town.

Wind Energy Strategy:

In the Wind Energy Strategy of the recently adopted TCDP, areas in the closest portion of County Tipperary to the site that had previously not been subject to a specific wind deployment zone have now been designated as 'An area unsuitable for wind energy development'.

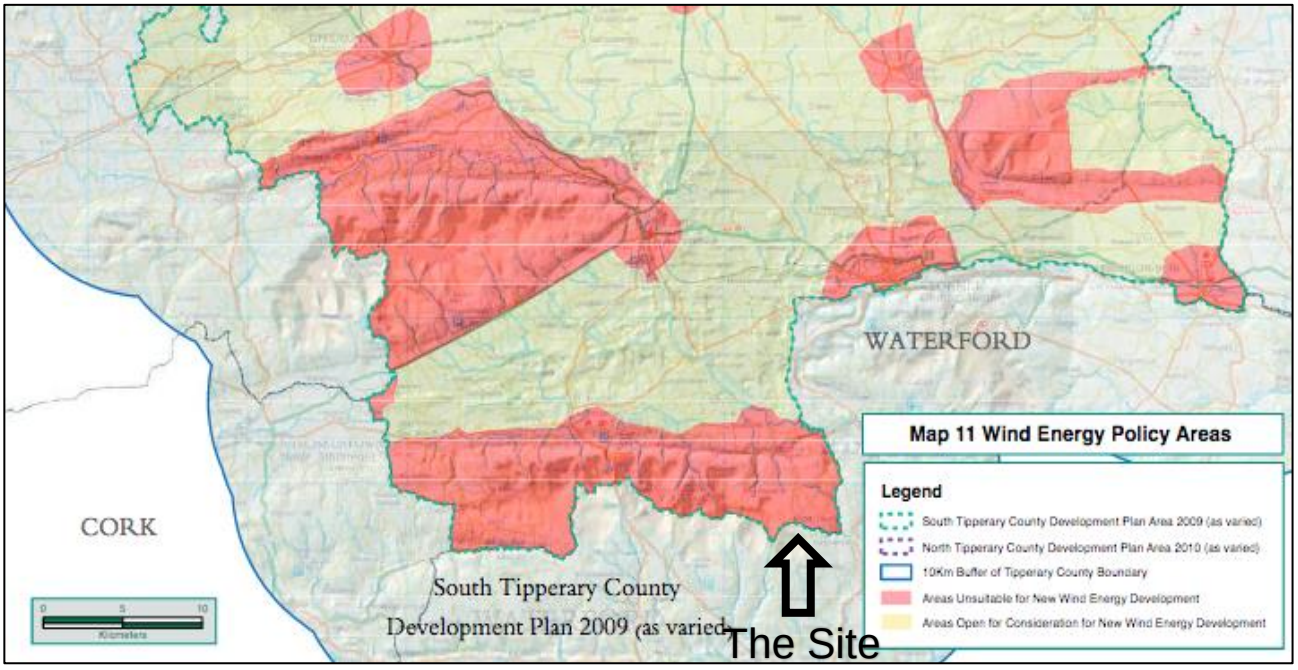


Figure 4.5: Excerpt from the Tipperary Renewable Energy Strategy showing the approximate location of the proposed development in relation to wind energy classification

4.4 Conclusions

The Development's contribution of between 72 -86.4 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. Other than for landscape, the Development meets Tipperary and Waterford's County Development Plans requirements for not having adverse impacts on the surrounding environment, including water quality, biodiversity or amenities. By utilising the newest and best turbine technology, the Development supports the growth of new and emerging renewable technologies. It is in line with the 'Planning Guidelines for Wind Farm Development 2006' and, save for the 2RD point discussed above, 'Draft Wind Energy Development Guidelines 2019" as per the WCCDPs 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 WCCDP.

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. 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 reduces 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 SEAI[23]. Energy demand in Ireland has been growing and is expected to continue to increase. This is particularly true of electricity demand, which is expected to grow by 57% to 2028[24]. 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 Dyrick Hill 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 will 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.

[23] SEAI. (2021). ENERGY IN IRELAND. https://www.seai.ie/publications/Energy-in-Ireland-2021_Final.pdf
[24] 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 Ireland[25] 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.

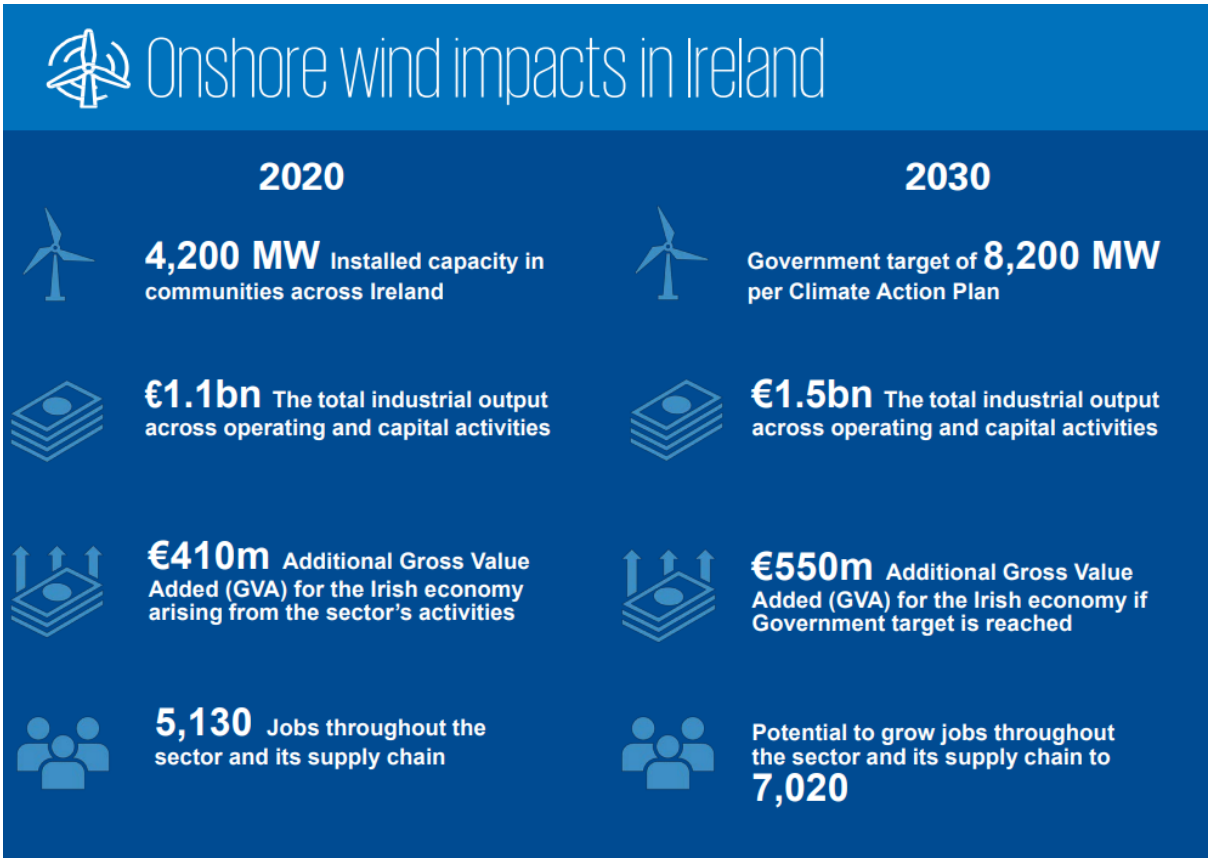


Figure 5.1: Onshore Wind Impacts in Ireland (From The Economic Impact of Onshore Wind in Ireland Figure 1.6)

By producing renewable wind energy, the proposed Dyrick Hill Wind Farm contributes towards moving Ireland closer to the target of 8,200 MW installed capacity wind energy by 2030. As of May 2022 the amount of installed capacity was 4.3 GW[26], leaving a shortfall of 3.9 GW to be achieved in the next 8

[25] WEI. (2021). The Economic Impact of Onshore Wind in Ireland https://windenergyireland.com/images/files/economic-impact-of-onshore-wind-in-ireland.pdf
[26] https://windenergyireland.com/about-wind/facts-stats

years,. Onshore wind creates jobs in the sector and increases additional gross value added to the Irish economy.

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 where the Development is in accordance with the provisions of the WCCDP.

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 identified European sites and species / habitats of qualifying interest. The NIS prepared for the Application has shown that the Development is not likely to have a significant adverse effect on the integrity of any European Site or species or habitat which are a qualifying interest connected with the European Sites in question.

The NIS concludes on the basis of the best available scientific evidence that it can be demonstrated objectively that no elements of the Development 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 its own or in-combination with other plans or projects, in light of their conservation objectives.

It is considered that the NIS 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 CAP 2023 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-.86.4 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 RSES.

5.2.4 Key environmental considerations

- Landscape
- Biodiversity
- Residential amenity

5.2.4.1 Landscape

The Development was previously in an area designated as "Open to Consideration" for wind farms in the Waterford County CDP Wind Energy Strategy Map 2016-2030. This

The landscape and visual impact assessment (LVIA) in Chapter 11 of the EIAR assesses the impacts of the Development in relation to the Waterford & City CDP.

The landscape and visual impact assessment (LVIA) in Chapter 11 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

5.2.4.2 Biodiversity

The WCCDP'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 on 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 3.5 ha of dry heath (Annex I listed habitat) – this effect is considered to have a Significant and Permanent negative impact on a local scale. This represents approximately 10% of the extent of this habitat occurring within the Development site. The mitigation methods outlined in the Habitat Management Plan will reduce the overall impact and improve surrounding degraded habitat such dry heathland and Fen. The Lisleagh Mountain wetland (Site Code: 173) was identified in the WCCPD. The Habitat Management Plan incorporates additional habitat management to enhance/restore the wetland site habitat.

The only protected terrestrial animal which was reported during the ecological surveys is Common Frog. Suggested mitigation measures include minimisation of the works footprint, preconstruction surveys to identify and avoid potential direct damage to any breeding areas of Badgers, Otters, and Amphibians (such as Common Newt and Common Frog), measures to avoid downstream pollution and habitat restoration and enhancement measures, as described in Chapter 6 of the EIAR.

Eight species of bats have been recorded as present at the Development during the bat surveys. All are listed as 'Least Concern' on the Irish Red List, and Annex IV of the EU Habitats Directive. Each of the locations of the twelve turbines was surveyed and the bat activity findings recorded informed the application of the 96.12 m or 85.8 m blade tip buffer at turbine locations, dependant on the surrounding habitat.

The Development will entail the crossing of three unmapped small watercourses along the access track network. The watercourses are all minor field ditches with limited fisheries value, though the downstream catchments are of significant value for salmonids. However, the mitigation measures described in Chapter 6: Biodiversity and Chapter 9: Hydrology & Hydrogeology, in to addition the

Earthworks Management Plan and Water Quality Management Plan, 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.

Golden Plover, an Annex I and Red list species, have been observed on the site. The commonage land provides winter feeding and roosting habitat for Golden Plover. The turbines located on the commonage lands are predicted to have a collision strike risk with the Golden Plover population on site with a mortality rate 6.21 per annum.

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 6: Biodiversity 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 WCCDP objectives as well as regional, National and International Policy.

5.2.4.3 Residential Amenity

A significant minimum separation distance of 750m from has been achieved to all occupied dwellings excluding two dwellings within the Project design. In relation to property H92, which is situated 710m from turbine 9, the landowner is a financially involved party. In relation to Property H106, which is 320 m from the nearest turbine, the landowner has entered into a Deed of Covenant covenanting that this property will be unoccupied from the commencement of construction until the decommissioning of the Development is complete, There are 19 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 in Chapter 15 of the EIAR. 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 WCCDP 2022-2028 as an 'Exclusion Zone', for wind energy. The relevant landscape policies in the WCCDP are L01 – L03 and LS04 and identified in **Figure 4.1**.

The Development has been designed with recognition of the existing sensitivities. 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	[27] The three facets of sustainable development are economic, social and environmental. Sustainable Development can be defined as "*Development that meets the needs of the present without compromising the ability of future generations to meet their own needs*."
Economic Role	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. The Development represents a strategically significant investment in the locality.
Social Role	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 2023 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 declaration, in 2019, of a climate emergency. 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 Development's contributions to reducing CO2 emissions and helping to avoid the negative environmental effects associated with climate change.
Environmental Role	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. Approximately 84,106.5 tonnes of carbon dioxide will be displaced per annum by the Development. Over the proposed 40-year lifetime of the wind farm, 364,260 tonnes of carbon dioxide will be displaced from traditional carbon-based

[27] Bruntland Report 1987

	electricity generation. This helps to mitigate climate change and will have a positive impact on the environment.

5.5 Contravention of draft Wind Energy Development Guidelines

Section 5.24 of the Development Management Standards set out in Volume 2 of the WCCDP states "*The Council will support renewable energy developments in line with policy objective UTL 13 of the Development Plan (Volume 1: Section 6.9). All applications for wind energy developments should be compatible with the 2006 Wind Energy Development Guidelines issued by the DoEHLG (or any updated revision of same), the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017), and the Waterford Renewable Energy Strategy (Appendix 7 of the Development Plan and in particular the wind energy designation map contained within the Strategy (Appendix 2 refers)) and the renewable energy targets set out in Table 6.3 of the Development Plan, while regard should also be had to the Waterford Landscape and Seascape Character Assessment (Appendix 8 of the Development Plan)*." Therefore, the requirements in the draft Wind Energy Development Guidelines 2019 (WEDGs) have been incorporated into the WCCDP.

The WEDGs provide "*Bearing in mind the requirements for optimal performance, a distance of not less than two rotor blades from adjoining property boundaries will generally be acceptable, unless by written agreement of adjoining landowners to a lesser distance. However, where permission for wind energy development has been granted on an adjacent site, the principle of the minimum separation distances between turbines in crosswind and downwind directions indicated above should be respected*."

We note that no permission has been granted for wind energy development on an adjacent site. However, at the western boundary of the Site the turbine(s) are less than two rotor blades diameter (2RD) from the adjoining property boundary. While written agreement from the adjoining landowners to this lesser distance has been sought such consent has not been provided at time of writing.

Therefore, the Project contravenes the WEDGs and, by virtue of their incorporation into same, the WCCDP. As set out above in relation to the "no go" area, if the Board considers this to be a material contravention of the WCCDP it may still decide to grant permission under s37G(6) of the Planning and Development Act 2000, as amended.

We consider that the Board should, notwithstanding the contravention, grant permission for the development for reasons of proper planning and sustainable development and because the proposed development is of strategic or national importance (as set out at Section 5.2 above). In addition, permission for the proposed development should be granted having regard to regional spatial and economic strategy for the area (as set out at Section 3.0 above), guidelines under section 28, policy directives under section 29, the statutory obligations of any local authority in the area, and any relevant policy of the Government (as set out Section 2.0 above), the Minister or any Minister of the Government.

5.6 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 err 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.

It is also outlined in the EIAR 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. 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. This demonstrates 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 Waterford and Tipperary county policy and finds the Development is in line with key renewable energy 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 WCCDP, and relevant material considerations. The environmental impact assessment process for the Development was commenced during the lifetime of the preceding WCCDP 2011-2017 (as extended) and with regard to the fact the area in question was categorised as an area 'open to consideration' in the still extant Renewable Energy Strategy (2016 – 2030) for County Waterford. The Renewable Energy Strategy has been readmitted into the current WCCDP 2022 – 2028 with a new area designations map. The findings of the Landscape Visual Impact Assessment (LVIA) (Chapter 11 of the accompanying EIAR) have been taken into consideration in the preparation of this Planning Statement and as part of the SID pre-application process. The LVIA states;

"t*he turbines comprising the wind farm will be often viewed in the context of some of the sensitive and susceptible upland parts of the Knockmealdown Mountains, there is a strong sense that the turbines are located within the more robust foothill landscape as opposed to the more scenic and naturalistic uplands*".

"..t*he proposed development is wholly consistent with the Draft Wind Energy Development Guidelines 2019 locational guidance for the Transitional Marginal Landscapes landscape type, which states "wind energy developments might also be located at lower levels in extensive areas of this landscape type, where they will be perceived against a relatively complex backdrop*"".

It is considered that, whereas the landscape sensitivity characterisation assigned within the extant 2022 – 2028 WCCCDP, and by extension the Renewable Energy Strategy 2016 – 2030, has changed, from an "open to consideration" to a "no go" area, the Site nonetheless still occupies a transitional landscape that aligns with how the landscape setting was formerly assigned as an area "open to consideration" for large commercial scale wind energy development.

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 in 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 CO_2 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 WCCDP, and compliance with the relevant regional planning policies and relevant guidance, it is concluded that the Development predominantly accords with 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 Development 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 be adequate to mitigate the potential environmental effects predicted.

Having regard to the energy targets set out in the Climate Action Plan 2023, local and regional planning policy and guidance presented and assessed within this Statement, it is imperative that renewable energy developments which are acceptable in broad 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 target of doubling of onshore wind energy in Ireland by 2030 and contributes to the nation's target to increase of renewable energy from 30% to 80% by 2030 as set out in the Climate Action Plan 2023.

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