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CONSULTANTS IN ENGINEERING, ENVIRONMENTAL SCIENCE & PLANNING

ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR) FOR THE PROPOSED COUMNAGAPPUL WIND FARM, CO. WATERFORD

VOLUME 2 – MAIN EIAR

CHAPTER 4 - POLICY

Prepared for:

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4. POLICY AND PLANNING

4.1 Introduction

This Chapter of the EIAR outlines current International, national, regional and local policy (where relevant) in combination with legislation relating to the Proposed Development .

The Irish Planning Policy system is set within a hierarchical structure, as identified in Image 4-1 extracted from the National Planning Framework – Ireland 2040, below. EU Directives, Planning Legislation, Ministerial Guidelines, Government Policy and Capital programmes inform national policy.

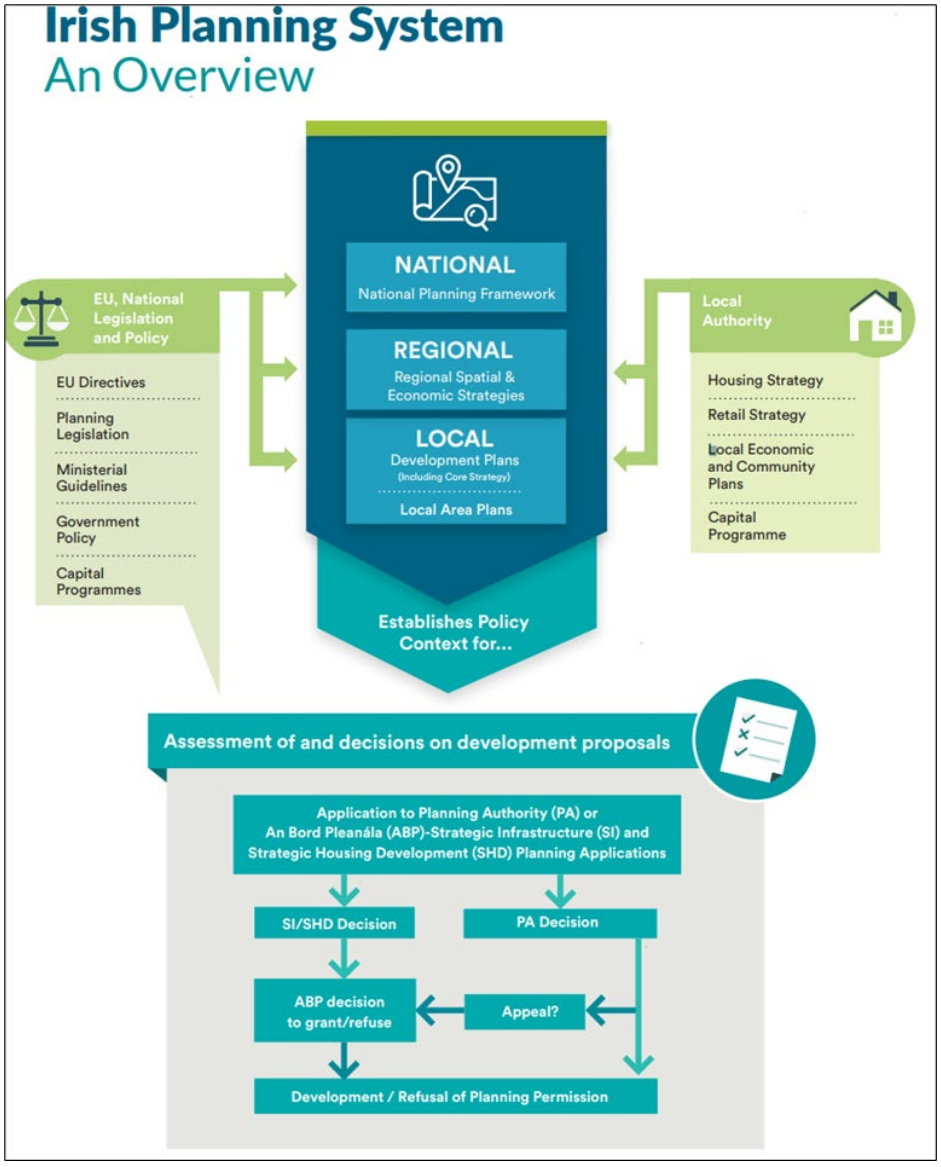

Image 4-1: Irish Planning System – An Overview

International and European legally binding agreements to reduce the reliance on fossil fuels and to manage climate change internationally have been adopted into Ireland's National Energy Policy. This section of the EIAR outlines how these legally binding agreements are being facilitated through national energy and climate policy with a clear mandate to support onshore wind energy development within the state.

The recent increase in renewable electricity targets to 80% by 2030 indicates the need for significant escalation in renewable energy production in Ireland. The following Chapter sets out how the proposed development complies with national and local energy policy and will contribute towards Ireland's national renewable energy targets.

4.2 International Global Policies

4.2.1 United Nations Framework Convention on Climate Change

The Conference of the Parties (COP) is the highest body of the UNFCCC and consists of environment ministers who have met annually since 1995 to assess progress in dealing with the issue of climate change. At the Glasgow climate conference (COP26) in November 2021, Countries reaffirmed the Paris Agreement goal of limiting the increase in the global average temperature to well below 2°C above pre-industrial levels and pursuing efforts to limit it to 1.5 °C. Furthermore, they recognised that the impacts of climate change will be much lower at a temperature increase of 1.5 °C compared with 2 °C. Furthermore, countries stressed the urgency of action "in this critical decade" when carbon dioxide emissions must be reduced by 45 per cent to reach net zero around mid-century.

The International Panel on Climate Change (IPCC) has put forward its clear assessment that the window for action on climate change is rapidly closing and that renewable energy sources such as wind will have to grow from 30% of global electricity at present to 80% by 2050 if we are to limit global warming to well below 2°C above pre-industrial levels in accordance with the COP 21 agreement. Former Environment Minister Alan Kelly remarked in 2015 that "As a nation, we must do everything in our power to curb our emissions". In this regard, the Government enacted the Climate Action and Low Carbon Development Act 2015 and the Climate Action and Low Carbon Development (Amendment) Act 2021 which provides for the approval of plans by the Government in relation to climate change for the purpose of pursuing the transition to a low carbon, climate resilient and environmentally sustainable economy

4.2.2 Kyoto Protocol

In 1997, the 'Kyoto Protocol' set legally binding obligations for developed countries to reduce their greenhouse gas (GHG) emissions within two commitment periods. 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.

A report by the International Energy Agency 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 on the Nationally Determined Contributions relating to renewable energy also note that, even with the renewable energy pledges in the 2021 Paris agreement, the 1.5oC goal will still be exceeded before the end of the century.

4.3 EU Directives and Policy

This section details the latest policies and targets for renewable energy and greenhouse gas (GHG) emissions in Europe with a view to 2030 and beyond. The various directives and policies of the EU set a clear mandate for each member state to transition to sustainable, renewable energy and reduce greenhouse gas emissions.

4.3.1 European Union Targets and the Irish Context

The EU Directive (2018/2001) on the '*Promotion of the use of Energy from Renewable Sources'* , the so-called *RES Directive*, includes a binding renewable energy target for the European Union for 2030 of 32% with an upwards revision clause by 2023. The Directive was adopted on 11 December 2018. It aims to provide guiding principles on financial support schemes for RES, renewable energy self-consumption, energy communities and district heating.

As part of this Directive, Ireland's overall national target for the share of renewable energy sources (RES-E), forms the backbone of Ireland's strategy to achieve the overall renewable energy target for 2030.

The Government set an ambitious national target for RES-E of 40% for 2020. Ireland fell just short of this target, achieving 39.1% RES-E in 2020, but despite this, electricity generation has been the most successful of the three modes for the development of energy from renewable sources. Renewable energy (when aggregated) is now the second largest source of electricity after natural gas.

Despite restrictions due to the Covid pandemic, Ireland has made considerable progress in achieving renewable electricity targets. Wind energy capacity at end of 2021 was 4,339 MW, an increase of 32.3 MW in 2021, with an additional 1,924 MW of additional wind capacity contracted. (Source: EirGrid and ESB Networks).

4.3.2 Clean Energy for all Europeans Package (2019)

The EU, in 2016, decided to tackle the transition towards clean energy and a carbon-neutral economy by rewriting the EU's energy policy framework to facilitate a clean and fair energy transition. By providing a modern, stable legal environment and setting a clear and common sense of direction, the EU aims to stimulate the necessary public and private investment and bring European added value by addressing these challenges. As a package, the new rules will reinforce consumer rights, putting them at the heart of the energy transition and creating growth and green jobs in a modern economy. They will enable the EU to show leadership in the fight against climate change following the Paris Agreement.

Member States will continue to choose their own energy mix but must meet new commitments to improve energy efficiency and the take-up of renewables in that mix by 2030. For example, the new rules on the electricity market, which have been adopted, will make it easier for renewable energy to be integrated into the grid, encourage more inter-connections and cross-border trade, and ensure that the market provides reliable signals for future investment. Member States are required to draft plans to prevent, prepare for and manage crisis situations in the supply of electricity in coordination with neighbouring Member States, and to enhance the role of the Agency for the Cooperation of Energy Regulators.

4.3.3 Recast Renewable Energy Directive (RED2)

In December 2018, the recast Renewable Energy Directive 2018/2001/EU entered into force, as part of the Clean energy for all Europeans package, aimed at keeping the EU a global leader in renewables and, more broadly, helping the EU to meet its emissions reduction commitments under the Paris Agreement. The new regulatory framework includes a binding renewable energy target for the EU for 2030 of 32% with an upwards revision clause by 2023. The European Parliament and the Council reached a provisional agreement on 30 March 2023, to raise the binding renewable energy target from 32% to at least 42.5% by 2030. In terms of renewable energy production, the agreement has achieved:

- A new, binding EU renewable energy target of 32% by 2030, including a review clause, provisionally agreed in March 2023, for an upward revision of the EU level target to 42.4%;
- Improved design and stability of renewable energy support schemes.

4.3.4 European Green Deal (December 2019)

The European Green Deal, published on 11 December 2019, is a growth strategy for the EU which aims to transform the EU into a fair and prosperous society, improving quality of life with modern, resource-efficient, and competitive economy where there are no net emissions of greenhouse gases in 2050 and where economic growth is decoupled from resource use. The EU aim to do this by becoming climate-neutral by 2050.

With regard to the supply of clean, affordable and secure energy, the European Green Deal underlines the fact that in order to meet the EU's climate and sustainability goals, all sectors must increase their use of renewable energy and phase out fossil fuels.

The EU aim to increase the greenhouse gas emission reductions targets for 2030 to at least 50% and towards 55%, compared to 1990 levels, in order to achieve net-zero greenhouse gas emissions by 2050. A key principle for achieving this will be to develop a power sector based on renewable resources.

Furthermore, the European Commission has indicated an intention to adopt the increased target of 55% as the EU's Nationally Determined Contribution (NDC) under the Paris Agreement by the end of 2020. As well as the target being given legislative force in the EU through the proposed EU Climate Law, it will oblige all EU institutions across all areas of competence, and the Member States, to work collectively to achieve the greenhouse gas emission reduction target of 55%.

4.3.5 European Climate Law (July 2021)

The European Climate Law, which entered into force on 9th July 2021, writes into law the goal set out in the European Green Deal for Europe's economy and society to become climate-neutral by 2050. The law also sets the intermediate target of reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels.

Climate neutrality by 2050 means achieving net zero greenhouse gas emissions for EU countries as a whole, by cutting emissions, investing in green technologies and protecting the natural environment. The law aims to ensure that all EU policies contribute to this goal and that all sectors of the economy and society play their part.

The main objectives of the climate law include:

- Setting the long-term direction of travel for meeting the 2050 climate neutrality objective through all policies, in a socially fair and cost-efficient manner;

- Setting a more ambitious EU 2030 target, to set Europe on a responsible path to becoming climate-neutral by 2050;
- Creating a system for monitoring progress and take further action if needed;
- Providing predictability for investors and other economic actors;
- Ensuring that the transition to climate neutrality is irreversible and compatible with the RePower EU Plan and Council Regulation (EU) 2022/2577 which lays down a framework to accelerate the deployment of renewable energy.

From 2021, the first EU Renewable Energy Directive (REDI) was replaced by the second EU Renewable Energy Directive (REDII), which continues to promote the growth of renewable energy and set renewable energy share (RES) targets out to 2030. REDII introduces new sustainability and verification criteria for biomass fuels and puts counting caps on certain biofuels. These changes in criteria and caps modify how our RES results in 2021 are calculated compared to 2020, even where the is little to no change in the underlying renewable energy:

- Ireland's overall renewable energy share was 12.5% in 2021 under REDII;
- Ireland's renewable energy share in electricity (RES-E) was 36.4% in 2021 under REDII;
- Ireland's renewable energy share in heat (RES-H) was 5.2% in 2021 under REDII;
- Ireland's renewable energy share in transport (RES-T) was 4.3% in 2021 under REDII.

4.3.6 RePower EU Plan

The RePower EU Plan was published on 18th May 2022 and is a plan which sets out a response to the hardships and global energy market disruption caused by Russia's invasion of Ukraine and the need for the role of renewable energy to slow down climate change and to phase out Russian fossil fuels by 2027. To address these, the RePower EU Plan contains measures to:

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

4.3.7 The RePower EU PLAN states:

> *"Wind energy represents a significant future opportunity: resources are stable, abundant and public acceptance is higher. Europe is the global leader in offshore wind. To further strengthen the EU wind sector's global competitiveness and achieve the REPowerEU ambition with fast wind energy deployment, supply chains need to be strengthened and permitting drastically accelerated."*

The RePower EU Plan specifically requires that Member States should speed up the green transition and spur massive investment in renewable energy. We will need to enable industry and transport to substitute fossil fuels faster to bring down emissions and dependencies.

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 the Coumnagappul Wind Farm, which would increase the domestic renewable energy production capacity of Ireland and its contribution to the EU overall target.

4.4 National Policies and Legislation

National energy and climate policy is informed by the overarching European Policy which aims to unify the European Union in energy and climate goals. The following section sets out the relevant national policies which will influence the proposed development.

These policies are supported by the latest Programme for Government (2020) '*Our Shared Future*' which presents strong climate governance in rapidly reducing climate change in order to protect and improve public health and quality of life. The government are committed to rapid decarbonisation of the energy sector with an aim of providing the necessary actions to deliver national renewable electricity targets. These government ambitions support the ongoing generation of renewable energy from onshore wind sources, as detailed in the following section.

4.4.1 Climate Action and Low Carbon Development (Amendment) Act 2021

First published in January 2016, *The Climate Action and Low Carbon Development (Amendment) Act 2021*, signed into law on the 23rd July 2021, 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, such as:

- 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 is 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.

Project Response:

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

4.4.2 Ireland's National Energy and Climate Plan 2021-2023 (NECP)

The NECP was prepared to incorporate all planned policies and measures that were identified up to the end of 2019 and will collectively deliver a 30% reduction by 2030 in non-ETS greenhouse gas emissions (from 2005 levels). The NECP was drafted in line with the current EU effort-sharing approach, before the Government committed to its higher level of ambition, and therefore does not reflect this higher commitment.

Under the EU Governance Regulation, Member States had to submit their 2021-2030 draft National Energy and Climate Plans (NECP's) by the end of 2018 and final plans by the end of 2019. The Commission has assessed these both at EU and Member State level. Member States will also need to update their NECPs by the end of June 2023 in a draft form and by 30 June 2024 in a final form in order to reflect an increased ambition. Member States are required to report on the progress made in implementing their energy and climate policies, including their NECPs, for the first time in March 2023 and every two years thereafter. The Governance Regulation is effectively the piece of EU legislation under which Ireland is held accountable in meeting its de-carbonisation targets. Ireland's National Energy and Climate Plan 2021-2023 (NECP) establishes key measures to address the five dimensions of the EU Energy Union, which include:

- Decarbonisation: GHG emissions and removals and Renewable Energy
- Energy efficiency
- Energy security
- Internal energy market
- Research, innovation and competitiveness

It is important to note that Article 4 of the Regulation sets out specific trajectory requirements for renewable energy share in key intermediate years of 2022, 2025 and 2027. The last version of Ireland's first NECP set out specific annual targets for delivery of onshore and offshore wind in order to meet the requirements of Article 4. These intermediate targets will be particularly difficult to deliver and will require early deployment of onshore wind in particular, as the legislative framework underpinning offshore wind is in its infancy. Within NECP, some relevant renewable energy objectives, which include:

- Achieve a 34% share of renewable energy in energy consumption by 2030;
- Increase electricity generated from renewable sources to 70% (note this target has been increased to 80% in the CAP21), underpinned by the Renewable Electricity Support Scheme (RESS). 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.

Project Response:

The minimum target for onshore wind in Ireland by 2025 is a total installed capacity of 5900MW, an increase of approximately 1,590MW between 2021 and 2025, and require the implementation of energy security objectives such as support efforts to increase indigenous renewable sources in the energy mix, including wind, solar and bioenergy, and to 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. This would need to increase substantially if there is any delay in the delivery of offshore wind in this period. Given the timelines for grid offer processing, financing and construction, which can only commence after a successful grant of planning permission, the delivery of this 2025 intermediate target will depend entirely on the scale of projects consented in the next 1-2 years.

4.4.3 Project Ireland 2040: National Development Plan 2021 - 2030

Published in October 2021, The National Development Plan 2021-2030 (NDP) contains the National Planning Framework 2018 (NPF), which sets out the Government's over-arching investment strategy and budget for the period 2021-2030. The Government gave approval for the first statutory review of the NPF on 20th June 2023, with the Expert Group submitting their report to Minister O'Brien on 16th August 2023, with an 'Issues Paper' currently in development for stakeholder consultation. The NPF aims to balance the demand for public investment across all sectors with focus on improving the delivery of infrastructure projects. The NDP provides a platform from which investment can be provided and strategized in terms of economic growth, development and sustainability needs. As a strategic development framework, Project Ireland 2040: The National Planning Framework, demonstrates an approach that joins up ambition for improvement across the different areas of Irish life, bringing the various government departments, agencies, state owned enterprises and local authorities together behind a shared set of strategic objectives for rural, regional and urban development.

The key role of the NDP is to set out the updated configuration for public capital investment over the next 10 years in order to achieve the National Strategic Outcomes as set out within the NPF. An example of this is outlined in NDP Chapter 13 *'NSO 8 - Transition to a Climate-Neutral and Climate-Resilient Society'*, which states:

> *"The Government will continue to support the deployment of additional electricity generation through the auction-based Renewable Electricity Support Scheme (RESS)"*

The NDP further outlines a number of key energy initiatives know as National Policy Objective's (NPO's), which outline a pathway to diversify our energy resources, and to assist in the transition towards a decarbonised society, with the most relevant to this Proposed Development being National Policy Objective 54 and 55, described in Table 4-1, below.

Table 4-1: National Planning Framework: National Policy Objective's (NPO's

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

The National Policy Objective in relation to NPO 55 has been met as the location of the Proposed Development has been assessed as having suitable wind resources in line with NPO 55. The Proposed Development has been assessed against each of the topics contained in the EIAR and adverse residual environmental impacts are avoided.

Project Response:

In achieving a Climate-Neutral and Climate Resilient Society, the NDP outlines strategic investment priorities which related to the aims of the Renewable Electricity Support Scheme. It is stated that the Renewable Energy Support Scheme (RESS) auctions will deliver competitive levels of electricity generation which indicatively could be up to 9 GW of onshore wind by 2030.

It is considered that such schemes, in conjunction with greater investment in renewable energy, diversity of supply and increased utilisation and adoption of electricity storage, will significantly assist in promoting a low carbon/less energy intensive supply. The investments outlined within the NDP Review will make a critical contribution to the achievement of a low carbon and resilient electricity system. The Proposed Development will contribute to the aims of the NDP in providing renewable electricity generation to the national grid.

4.4.4 Ireland's Greenhouse Gas Emission Projections 2022 - 2040

The National Climate Change Strategy designated the Environmental Protection Agency (EPA) with responsibility for developing annual national emission projections for greenhouse gases for all key sectors of the economy, including transport. The EPA publishes greenhouse gas emission projections on an annual basis and submits emission projections to the Commission as required under Monitoring Mechanism Regulation 525/2013.

Published in June 2023, the EPA's publication entitled '*Ireland's Greenhouse Gas Emission Projections (2022-2023)'* provides an assessment of Ireland's total projected greenhouse gas (GHG) emissions from 2022 to 2040, using the latest inventory data for 2021 as the starting point. As the first projected year (2022) has passed, indicator data is used where possible instead of projections. Preparing the EPA projections involves compiling and processing key data such as energy projections (projected fuel use in households, industry, services, transport and agriculture), developments in the agriculture and land use sectors and projected emissions from industrial products. The EPA has produced GHG projections using two scenarios or levels of ambition. The two scenarios represent different possible trajectories for Ireland's GHG emissions.

The first scenario, With Existing Measures (WEM), forecasts Ireland's emissions including all national policies and measures implemented by the end of 2021. Implemented policies and measures such as those in the National Development Plan (NDP), Climate Action Plan 20197 and Climate Action Plan 20218 are included in this scenario. Many Climate Action Plan 2021 policies and measures are not in the WEM scenario as they are still considered to be planned rather than implemented.

The second scenario, With Additional Measures (WAM) has a higher level of ambition and includes government policies and measures to reduce emissions such as those in Ireland's Climate Action Plan 2023 (CAP23). This was published in December 2022 and the included policies and measures that have not yet moved into implementation phase. As implementation happens the policies and measures will be migrated into the With Existing Measures scenario.

The National Climate Change Strategy designated the Environmental Protection Agency (EPA) with responsibility for developing annual national emission projections for greenhouse gases for all key sectors of the economy, including transport. The EPA publishes greenhouse gas emission projections on an annual basis and submits emission projections to the Commission as required under Monitoring Mechanism Regulation 525/2013.

The EPA's publication entitled *Ireland's Greenhouse Gas Emission Projections (2019)* provides an updated assessment of Ireland's projected greenhouse gas emissions out to 2040 which includes an assessment of progress towards achieving its emission reduction targets to 2030 set down under the EU Effort Sharing Decision (Decision No 406/2009/EC). Ireland's 2020 target was to achieve a 20% reduction of non-Emission Trading Scheme (non-ETS) sector emissions (i.e., agriculture, transport, the built environment, waste and non-energy intensive industry) on 2005 levels with annual binding limits set for each year beyond 2020. 2030 targets for EU Member States were adopted by the European Council in 2018. Irelands 2030 target under the Effort Sharing Regulation is a 30% reduction of emissions compared to 2005 levels by 2030. There will be binding annual limits over the 2021-2030 period to meet that target.

Project Response:

During its operation, the estimated 88.3 GWh of electricity produced by the Proposed Development would be sufficient to supply approximately 21,000 Irish households with electricity per year, based on the average Irish household using 4.200 MWh of electricity (this figure is available from the March 2017 CER Review of Typical Consumption Figures Decision).

Thus, this energy will be used to offset the same amount of energy that would otherwise be generated from burning of fossil fuels at power stations.

It is estimated that 42,966 tonnes of CO2 emissions per annum will be offset due to the Proposed Development. As a result, the operational stage of the proposed wind farm will have a significant long-term positive impact on air quality and climate change, in line with policy and legislation at a local, regional, national and international level.

Further details relating to the positive effects of the proposal on air quality and climate change are included in Chapter 7- Air and Climate of this EIAR.

4.4.5 National Energy Security Framework

In response to the European Commission's REPowerEU action statement the Government of Ireland issued the National Energy Security Framework 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.

Project Response:

The new Irish framework underlines the importance of new renewable energy generation projects, such as the Proposed Development, in securing Ireland's energy supply in light of the ongoing conflict in Ukraine and associated energy supply chain issues leading to shortages and energy price increases.

4.4.6 Climate Action Plan 2023 (CAP23)

The Government published an updated Climate Action Plan 2023 (CAP23) in December 2022. This second updated action plan follows on from the inaugural plan of 2019 which was a result of the Irish Government declaring a climate and biodiversity emergency on 9th May 2019.

The CAP provides a framework for delivering the Government's target of a 51% reduction (relative to 2018) in greenhouse gas (GHG) emissions by 2030. CAP23 follows the Climate Action and Low Carbon Development (Amendment) 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. The Act provides a governance framework for annual revisions of the Climate Action Plan and the development of a National Long-Term Climate Action Strategy at least once every ten years. As part of this plan, the Government is also committed to reducing emissions by an average 7% per annum by 2030. The Action Plan is underpinned by a series of sectoral emissions reduction ambitions and enabling actions, with a selection of relevant actions that are relevant to the Proposed Development, as outlined below.

CAP23 sets out an objective to more than double Ireland's onshore wind energy capacity to 9 GW by 2030 in order to meet new renewable energy targets and reduce emissions.

Key actions of relevance to the proposed development include:

- *The electricity system must achieve a 75% reduction in CO2, reaching 3MtCO2eq in the final year of 2026 - 2030 carbon budget period.*
- *Deliver up to 9 GW onshore wind (with 6GW by 2025) by 2030.*
- *Complete a revised version of Shaping our Electricity Future to define required new grid construction and reinforcements to achieve sectoral ceilings and carbon budgets.*
- *As an urgent priority, establish the investment framework and competitive market, arrangements needed to deliver zero carbon system services.*
- *Align the relevant constituent elements of the planning and permitting system to support accelerated renewable energy development and ensure renewables will be considered to be in the overriding public interest.*
- *Action EL/23/1: Establish a taskforce to accelerate renewables.*
- *Action EL/23/2: Publish the Renewable Electricity Spatial Policy Framework*
- *Action EL/23/3: Publish a roadmap for the development and implementation of Regional Renewable Electricity Strategies*
- *Action EL/23/4: Prepare new draft Wind Energy Development Guidelines for onshore renewables.*
- *Action EL/23/5: Complete analysis to update Shaping Our Electricity Future to accommodate 80% renewables and align with carbon budgets and sectoral emissions ceilings for electricity.*
- *Action EL/23/6: Ensure electricity generation grid connection policies and regular rounds of connection offers which facilitate timely connecting of renewables, provides a locational signal and supports flexible technologies.*

- *Action EL/23/7: Publish an annual report setting out identifiable public benefits delivered by renewable energy sector including employment and skills/ training metrics, local investment and community benefits.*
- *Action EL/23/10: Deliver onshore and offshore RESS auctions as per the annual RESS auction calendar.*
- *Action EL/23/21: Carry out further studies to identify the investments and upgrades needed to facilitate 80% renewable electricity annual share.*

Project Response:

The policies and objectives of the CAP are reflected in the *Draft National Energy & Climate Plan (NECP)* 2021-2030, which was submitted to the European Commission in December 2018. CAP23 sets a target of increasing onshore wind to 6GW by 2025 and 9 GW by 2030, as of May 2022 this was 4.3 GW10, leaving a shortfall of 4.7 GW to be achieved in the next 7 years. The Proposed Development would contribute up to 72 MW of renewable, domestically produced wind energy, helping Ireland to reduce emissions, improve energy security and achieve renewable electricity targets.

4.5 National Policy and Legislation: Conclusion

The development of the Proposed Development is in support of national policy as set out above. The project supports the enhancement of the competitiveness of rural areas and facilitates the development and diversification of the rural economy by supporting the energy sector and increasing the share of renewables in Ireland's energy mix.

The Proposed Development contributes to the nation's target increase of renewable energy from 30% to 80% by 2030 and supports the doubling of onshore wind energy in Ireland by 2030 as set out in the Climate Action Plan 2023

The project supports national targets of climate change mitigation and reduction in greenhouse gas emissions Where significant focus has been set out in the recent Climate Action and Low Carbon Development (Amendment) Act 2021. The ambitious programme for government is prioritising carbon neutrality and renewable energy generation. In light of this, it is important for the nation to rely on proven technologies such as on shore wind in order to meet the near-term objectives, as well as long-term objectives. Furthermore, the National Energy Security Framework underlines the importance of new renewable energy generation projects, such as the Proposed Development, in securing Ireland's energy supply in light of the ongoing conflict in Ukraine and associated energy supply chain issues leading to shortages and energy price increases.

In 2021 the EPA published '*The Status of Ireland's Climate 2020*', which demonstrates that the country is becoming warmer and wetter while sea levels and greenhouse emissions are rising. Extreme weather events, such as droughts and wet spells, are becoming more frequent and lasting longer, and already detrimentally impacting our ecosystem, crops and coastlines. The urgency with which Ireland and the rest of the world need to tackle climate breakdown is clear and reflected in our national targets, with the energy sector a key component in reaching decarbonization.

The Proposed Development promotes the generation of renewable energy at appropriate locations and supports the achievement of a low carbon economy by 2050. It is therefore considered that the Proposed Development is in line with national policy and supports the achievement of national energy and sustainability targets.

4.6 Regional Policies

4.6.1 Southern Regional Spatial & Economic Strategy

The Southern Regional Spatial & Economic Strategy (RSES) came into effect on 31st January 2020. The RSES sets out a strategy to implement the NPF at a regional level and covers the period from 2020-2026. The RSES sets out a strategic vision which includes actions to mitigate against climate change. The RSES recognises the urgency to transition to a low carbon future, accelerate the transition towards a low carbon economy and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture in order to safeguard and enhance the region's environment through sustainable development, prioritising action on climate change across the region, driving the transition to a low carbon and climate resilient society.

In relation to wind energy, the RSES states the following:

> *"Wind energy is currently the largest contributor of renewable energy, and it has the potential to achieve between 11-16GW of onshore wind and 30GW of offshore wind by 2050 (SEAI, 2016). The sector can make a significant contribution to meeting national energy demands while attaining our energy and emissions targets for 2020 and beyond."*

The RSES includes a range of policy objectives which support the development of renewable energy projects such as the Proposed Development. Objectives include the following:

Table 4-2: Regional Spatial and Economic Strategy Objectives

Policy	Description
RPO 50	It is an objective to further develop a diverse base of smart economic specialisms across the rural Region, including innovation and diversification in (among other things) renewable energy as a dynamic driver for the rural economy.
RPO 56	The RSES recognises the urgency to transition to a low carbon future and it is therefore an objective to accelerate the transition towards low carbon economy and circular economy through mechanisms such as the Climate Action Competitive Fund;
RPO 95	It is an objective to support implementation of the National Renewable Energy Action Plan (NREAP), and the Offshore Renewable Energy Plan and the implementation of mitigation measures outlined in their respective SEA and AA and leverage the Region as a leader and innovator in sustainable renewable energy generation.
RPO 99	It is an objective to support the sustainable development of renewable wind energy (on shore and offshore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.

Project Response:

The development of the Proposed Development will aid in meeting the objectives set out in the RSES including diversification of the rural economy, actions against climate change and the sustainable development of wind energy at an appropriate location.

4.7 Local Policy

4.7.1 Waterford City and County Development Plan 2022-2028

It is a specific planning policy requirement under Section 28 of the Planning & Development Act 2000 (as amended) that in making development plans, a planning authority has regard to national policy on renewable energy, as contained in the aforementioned policy documents.

A County Development Plan is required to indicate how the implementation of the development plan will contribute to realising overall national targets on renewable energy and climate change mitigation. This applies in particular to wind energy production and the potential wind energy resource.

Policies specific to wind energy development in County Waterford are contained within the current Waterford City and County Development Plan (2022-2028), which came into effect on Tuesday 19th July 2022.

In relation to Renewable Energy, the Waterford City and County Development Plan 2022-2028, Chapter 6, Section 6.9 *Utility, Energy & Communication* Policy Objectives shows the plan supports the delivery of sustainable sources of energy. Chapter 6 further outlines Waterford's approach to meeting the county's share of national renewable energy target of 15.5GW, with an onshore wind energy target of 9 GW. Within the lifetime of the Waterford City and County Development Plan 2022-2028, Waterford aims to deliver c. 2.64% of the onshore wind energy growth requirement (Waterford comprising 2.64% of the land mass of the Republic of Ireland), which equates to +211.20 MW. Relevant key objectives to facilitate this listed in Table 4-6, below.

Table 4-3: Key Policy / Objectives from Waterford City and County Development Plan (2022-2028)

Utility, Energy & Communication Policy Objective	Description
Policy 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,**

Utility, Energy & Communication Policy Objective	Description
	• Ensures sufficient heat density (e.g., compact growth) and diversity of connected heat loads (e.g. 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.
UTL 12: Energy Strategy/ Masterplan	Undertake a review/ update of the Waterford Renewable Energy Strategy during the lifetime of this Development Plan, in order to assist in creating evidence-based, realistic and costed pathways for Waterford to achieve its just transition to carbon emission reduction targets to 2030 and 2050. In addition to comprising an update to the existing renewable energy context and technologies in Waterford, the review will chiefly comprise and provide an overall, integrated Energy Strategy/ Masterplan for Waterford, which takes into account (inter alia): • A detailed and comprehensive energy assessment, incorporating a Spatial Energy Demand and Generation Analysis. • Heat mapping which identifies areas for Strategic Energy Zones and District Heating (or other low carbon heating technologies) opportunities to support a just transition to clean energy and a circular economy. • Identifying specific opportunities and projects, actions and targets associated with improved energy efficiency. • Lessons learned from the Decarbonising Zone 'living laboratory', and the need to advance this concept across Waterford, in line with evolving climate policy and legislative requirements. • The creation of a smarter local energy model, enabling a smarter, more coordinated approach to planning and meeting distinct local energy needs that will link with developments at the regional and national scale.
UTL 13: Renewable Energy	It is the policy of Waterford City and County Council to promote and facilitate a culture of adopting energy efficiency/ renewable 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 6.2 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.

Utility, Energy & Communication Policy Objective	Description
	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, 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. • 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 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.

Utility, Energy & Communication Policy Objective	Description
	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.
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); • 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

Waterford City and County Development Plan (2022-2028), Chapter 10 '*Landscape, Coast/ Marine and Blue Green Infrastructure*' contains a '*Landscape and Seascape Character Assessment'* conducted in 2020, which identified seven landscape types in county Waterford, which identified the location of the Proposed Development located within *Landscape Character Type 6 – Uplands*, as shown in Image 4-2, below.

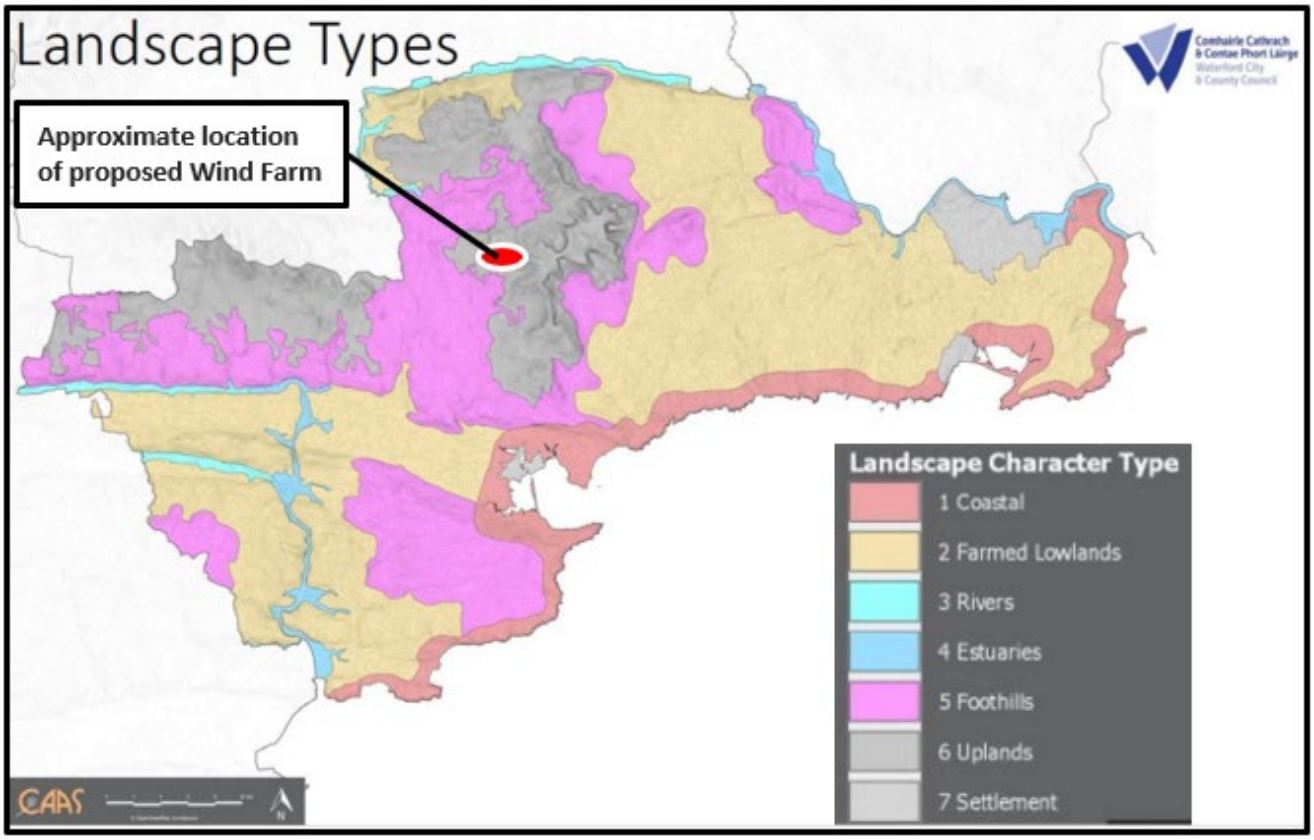

Image 4-2: Waterford County Landscape Types Map showing location of the Proposed Development located within Landscape Character Type 6 – Uplands.

The Waterford City and County Development Plan (2022-2028) states the landscapes outlined above are:

> *"subject to varying forces for change and in turn have varying capacity to accommodate development that can impact on that particular landscape character. Each unit of character is assigned an indicator of sensitivity, which indicates the extent to which the landscape will be vulnerable to change in its character. The categories (most sensitive, high sensitivity, low sensitivity and least sensitivity) reflect the criteria of the capacity to absorb new development as well as the potential to create disproportionate visual impacts."*

All development proposals within the Waterford City and County Development Plan (2022-2028) area will be evaluated to assess their compliance with standards and legal requirements as contained within the 2014 *National Landscape Strategy* and the 2020 *Waterford Landscape and Seascape Character Assessment*, as shown in Image 4-3, below.

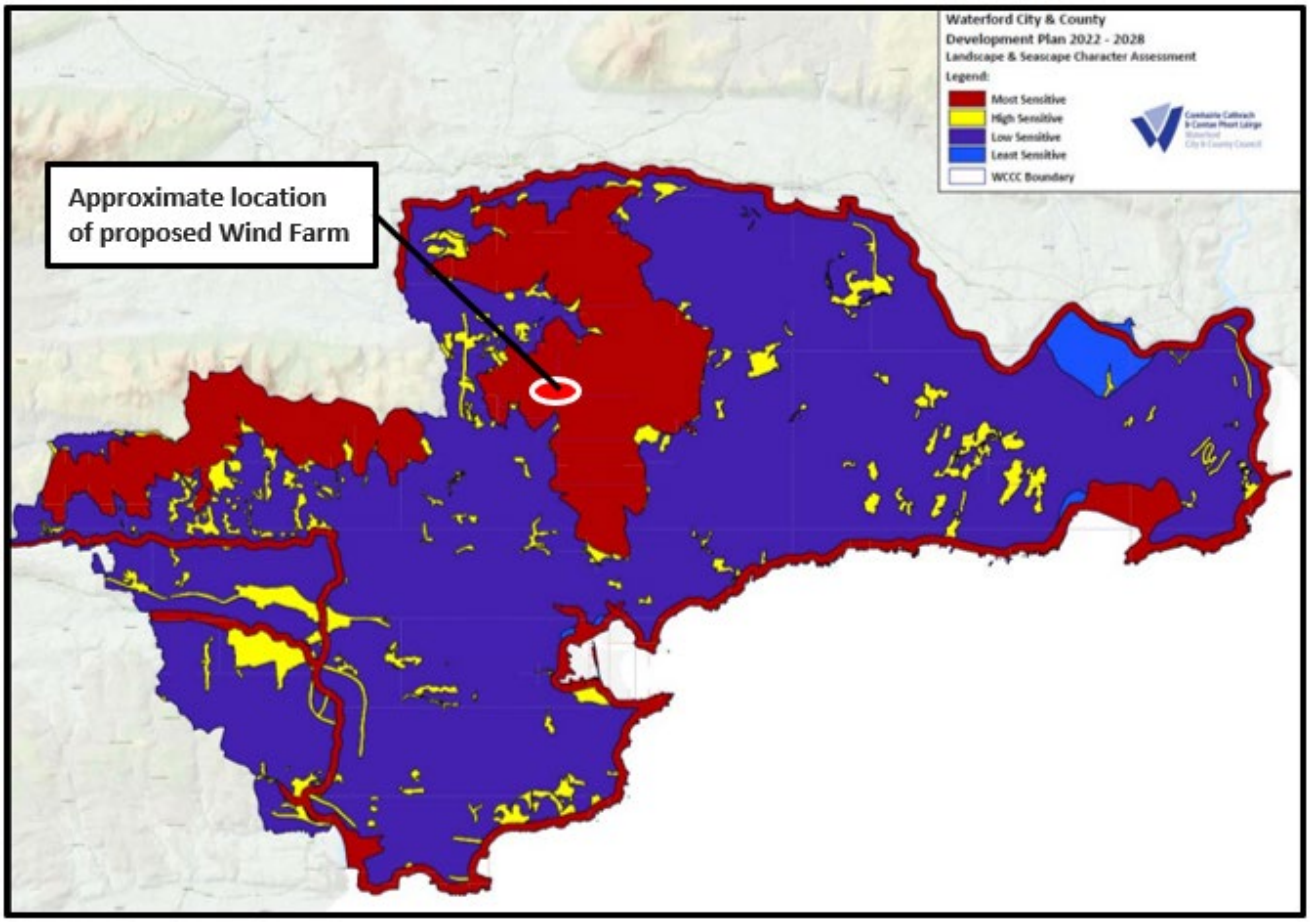

Image 4-3: Waterford Landscape and Seascape Character Assessment

Relevant *Landscape and Seascape Character Assessment objective* specifically related to landscape and scenic views are shown in Table 4-7:

Table 4-4: Key Landscape Policy Objectives from Waterford City and County Development Plan (2022-2028)

Landscape Policy Objective	Description
a L 01: National Landscape Strategy	We will support provisions of the 2014 National Landscape Strategy and provide for the sustainable management of all of County Waterford's landscapes including archaeological landscapes, waterway corridors, coastal, upland, rural and periurban landscapes.
a 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.
L 03: Landscape and Seascape Character Assessment	We will assess all proposals for development outside of our settlements in terms of the 2020 Landscape and Seascape Character Assessment and the associated sensitivity of the particular location. We will require a *Landscape and Visual Impact Assessment* (LVIA) for proposed developments with the potential to impact on significant landscape features within the City and County. Proposals for significant development (e.g., renewable energy projects, telecommunications and other infrastructure and the extractive industry) shall be accompanied by a LVIA which includes *Zones of Theoretical Visibility* (ZTV) which indicate the landscape impact zone within which the proposed development may be seen. There will be a presumption against developments which are located on elevated and exposed sites and where the landscape cannot accommodate such development with reasonable and appropriate mitigation.
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.

Waterford City and County Development Plan (2022-2028), Volume 2, Section 5.0 '*Non-Residential Development*' outlines the Development Management Standards which sets out development management standards and principles to be applied by the Council to ensure that development occurs in an orderly and efficient manner, and that it is in accordance with proper planning and sustainable development.

In relation to wind energy, Section 5.24 '*Renewable Energy Developments*' describes the Development Management Standards criteria applied to an assessment of wind farm applications. All applications for wind farm and wind energy developments should be compatible with the 2006 Wind Energy Development Guidelines issued by the DoEHLG (or any updated revision of same) and the Waterford Renewable Energy Strategy (4.6.3, below), regard should also be had to the Waterford Landscape and Seascape Character Assessment (Table 4.7, above).

Furthermore, to protect the safety of operations at Waterford Regional Airport, wind farm development proposals should have regard to Volume 1: Appendix 12 - Waterford Regional Airport & Business Park Masterplan which contains details of Airport Control Zones. It is recommended that wind farm applicants should also consult with Waterford Airport plc and/or the Planning Authority prior to the advancement of such proposals.

Situated at a lower elevation than the Proposed Development, a Waterford City and County Council designated '*Scenic Route*' is located c. 2.6km west of the Proposed Development, as shown in Image 4-4, below. This is identified as:

> *"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."*

Landscape designations and conservation sites to protect habitats and species including coastal habitats, uplands, water corridors and wetland habitats, grasslands, woodlands and hedgerows. This would be an important consideration for any wind farm proposed in the area of designated areas.

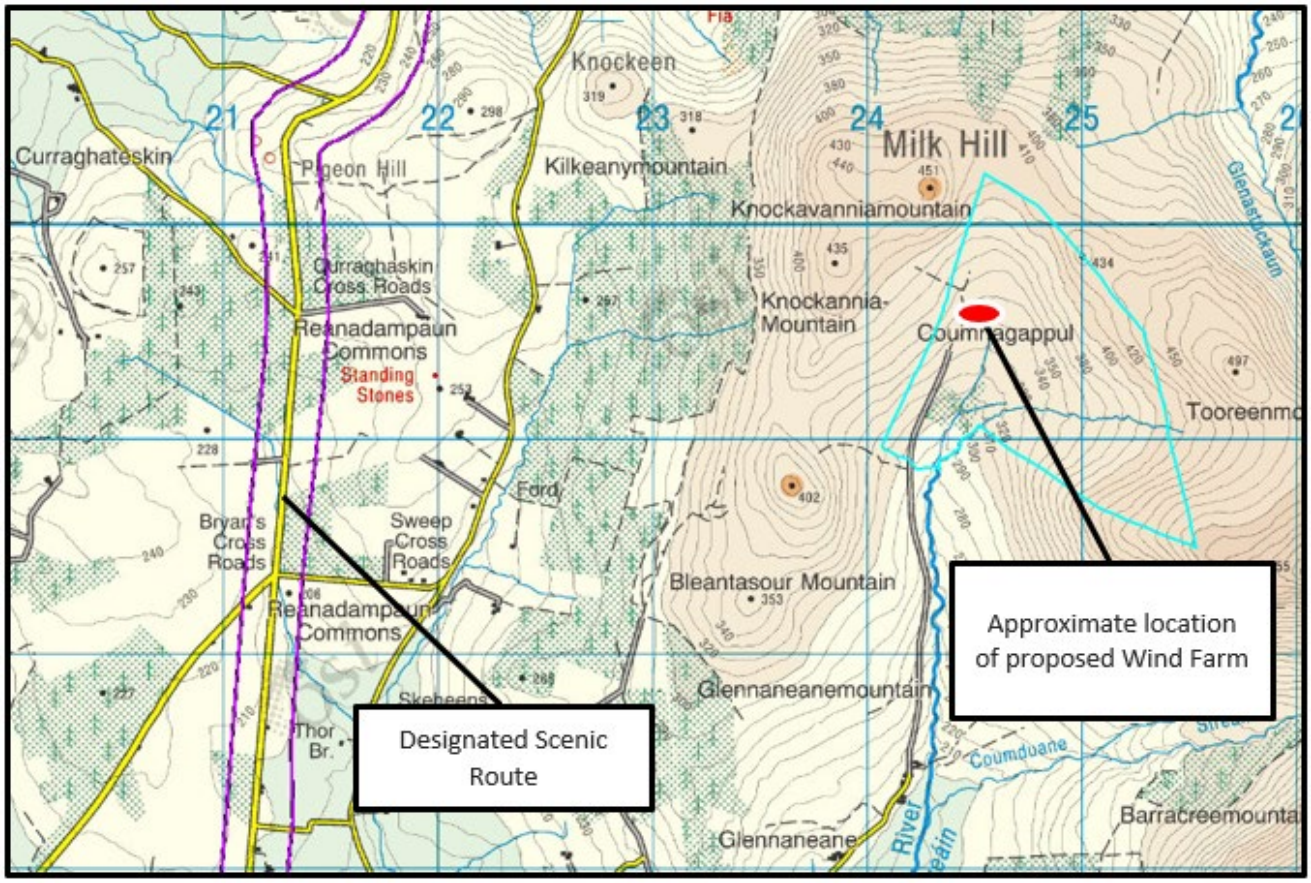

Image 4-4: Scenic Route (in purple) from north-west from Dungarvan to Tooraneena on the R672, with the location of the Proposed Development to the east at a higher elevation.

4.7.2 Renewable Energy Strategy for Waterford City and County (2016-2030)

The '*Renewable Energy Strategy*' for Waterford City and County has been prepared in the context of EU and national renewable energy targets. The purpose of the Renewable Energy Strategy is to provide a strategic document which will underpin the Waterford County and City Development Plans and Local Area Plans and to inform their future review.

The Renewable Energy Strategy 2016-2030 examines the renewable energy potential for the city and county and considers the strategic planning factors contributing towards the deployment of such renewable energy. It also highlights the importance of integrating renewable energy and landuse planning.

The Renewable Energy Strategy 2016-2030 recognises that there is a need to strengthen links between renewable energy and landuse planning through City and County Development Plans, Strategic Development Zones and other local plans, with the Renewable Energy Strategy forming part of the Waterford City and County Development Plan (2022-2028).

To provide a strategy to maximise Waterford's renewable energy potential, the Renewable Energy Strategy outlines the following '*Strategic Aims'*:

- To ensure that between now and 2030, there is a steady, progressive and measurable increase in the amount of renewable energy used in the electricity, heat and transport sectors in Waterford, commensurate with the achievement of the national target.
- To identify opportunities for various renewable energy technologies and resources appropriate to Waterford.
- To maximise the opportunities for renewable energy development whilst safeguarding the environment and other amenities, subject to Strategic Environmental Assessment and Habitats Directive Assessment requirements.

4.7.3 Local Policy Conclusion

Local energy policies have been reinforced by the current Waterford City and County Development Plan 2022-2028 which advocates for a plan-lead approach to wind energy development within the county. The immediate site area of the Proposed Development accords with all three strategic aims of the Waterford City and County Renewable Energy Strategy 2016-2030 and is aligned with the vision of the strategy.

4.8 Other Relevant Policies and Guidelines

4.8.1 Department of Environment, Heritage and Local Government – Wind Energy Development – Planning Guidelines 2006

The Wind Energy Development Planning Guidelines (2006) published by the Department of the Environment, Heritage and Local Government (DoEHLG) offer advice to planning authorities assessing planning applications for wind farm developments. The guidelines set out criteria which assist in the identification of suitable locations for wind energy development. They are also of assistance to developers and the wider public in considering wind energy development.

The Proposed Development has considered the provisions of the Wind Energy Development Guidelines 2006 in the design and siting of the Coumnagappul Wind Farm. The Proposed Development is considered to be in line with the recommendations as set out in the Guidelines.

4.8.2 Draft Revised Wind Energy Development Guidelines (December 2019)

The Draft Revised Wind Energy Development Guidelines were published in December 2019 for public consultation until February 2020. The guidelines will supersede the 2006 guidelines once formally adopted by the government. The revised guidelines aim to apply consistency across all Renewable Energy Strategies with regard to Development Management objectives. The key points of note in the draft Revised Guidelines include:

- Revised set back distances. 4 times the tip height is to be applied between turbines and the nearest point of the curtilage of any residential property with a mandatory minimum set back distance of 500 meters to be applied.
- Revised noise limits provide a higher level of protection to nearby residential receptors. The draft guidelines propose a noise limit, referred to as a Relative Rated Noise Limit in the range of 35 – 43 dB(A), while not exceeding the background noise level by more than 5dB(A) with an upper limit of 43 dB(A).
- The draft guidelines confirm a policy of 'zero shadow flicker' at nearby existing dwellings or other affected properties.
- Wind energy developers will have to provide an opportunity for the Proposed Development to be of enduring economic or social benefit to the local community, whether by facilitating community investment/ ownership in the project, other types of benefits/ dividends, or a combination of the two.
- The revised guidelines encourage the implementation of a standardised operational period of 30 years for wind energy developments across the country.

The Proposed Development has been designed in accordance with the current statutory Section 28 Ministerial Guidelines, Wind Energy Development Guidelines 2006. We are aware that these guidelines are subject to targeted review and therefore the design of the project has had regard to the Draft Revised Wind Energy Development Guidelines, published by the Department of Housing, Planning and Local Government (December 2019).

In this regard the proposed layout has achieved a minimum separation distance of 700m between turbine locations and the closest dwelling house of non-financially involved landowners. Furthermore, an objective to avoid shadow flicker at nearby dwellings through mitigation measures has also been included in the project, in line with the draft guidelines.

4.8.3 Irish Wind Energy Association – Best Practice Guidelines for the Irish Wind Energy Industry

The '*Best Practice Guidelines for the Irish Wind Energy Industry*' were published by the Irish Wind Energy Association (IWEA) in 2008 and the Guidelines were updated in 2012. These guidelines are to encourage responsible and sensitive wind farm development, and to aid and recommendations for those developing onshore wind energy projects in Ireland.

The approach to the Proposed Development is in line with the 2012 IWEA guidelines in that it is in accordance with relevant planning and environmental legislation, requirements for environmental impact assessment, provides an environmentally sensitive design, takes account of best practice health and safety and provides opportunities for quality public engagement in order to develop a responsible and sensitive wind energy project.

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

The Best Practice Principles in Community Engagement and Community Commitment were published by IWEA in 2013. IWEA and its members support the provision of financial contributions by wind farm operators to local communities and have sought to formulate best practice principles for the provision of a community commitment. The document sets out IWEA's best practice principles for delivering extended benefits to local communities for wind farm developments of 5MW or above.

Best Practice Principles of community engagement when planning the engagement strategy and preparing associated literature are also outlined in the document. The aim of the publication is to ensure that the view of local communities is taken on board at all stages of development and that local communities share in the benefits of the development. Throughout the consultation process for the Proposed Development, specific regard has been taken of this guidance document. Details of the public and stakeholder consultation process conducted throughout the development of the project are detailed in Chapter 5 – EIA Scoping, Consultation and Key Issues.

4.8.5 Code of Practice for Wind Energy Development in Ireland – Guidelines for Community Engagement

In December 2016, the Department of Communications, Climate Action and Environment (DCCAE) issued a code of practice for wind energy development in relation to community engagement.

This Code of Good Practice:

> *"is intended to ensure that wind energy development in Ireland is undertaken in observance with the best industry practices, and with the full engagement of communities around the country."*

The guidance states that the methods of engagement should reflect the nature of the project and the potential level of impact that it could have on a community. Throughout the consultation process the applicant has had regard to the Code of Practice for Wind Energy including the practical steps that wind farm developers should comply with in engaging with communities as set out in this Guidance.

4.8.6 Commission for Regulation of Utilities: Grid Connection Policy

The Commission for Regulation of Utilities (CRU) (previously the Commission for Energy Regulation (CER)) launched a new grid connection policy in March 2018 for renewable and other generators, known as ECP-1, which will seek to allow "shovel ready" projects that already have a valid planning permission, connect to the electricity networks. The principal objective which guides this decision is to allow those projects which are 'shovel ready' to have an opportunity to connect to the network, along with laying the foundations for future, more regular batches for connection.

The first connection offers were issued in August 2018 with the '*Ruleset for Enduring Connection Policy Stage 2 (ECP-2)*' published in 2020 stating the system operators are expected to hold further batches at the end of March 2021.

On the 10th of June 2020, the CRU published their decision on ECP-2, which set policy for at least three annual batches of connection offers (ECP 2.1, ECP-2.2, and ECP-2.3). The application windows are envisaged to be open for the month of September each year.

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

4.8.7 Renewable Electricity Support Scheme 3 (RESS 3)

The third incarnation of the Renewable Electricity Support Scheme (RESS 3) was announced on 26th September 2023. RESS 3 aims to support renewable electricity projects in Ireland. The RESS 3 auction will support the achievement of the increased ambition of up to 80% renewable electricity by 2030 as set out under the National Development Plan (NDP) and the policies and measures in the Climate Action Plan 2023 (CAP 23). The RESS Scheme ensures that we are on a pathway to meet our ambitious climate targets and lays the foundations of a thriving and cost effective renewable electricity market. This will support the growth of the green economy, create sustainable work opportunities, and benefit the consumer as renewables become more cost effective.

Eligible projects include onshore wind, offshore wind, solar, hydro along with many other renewable generation methods. The RESS scheme has a number of key policy objectives, which include:

- To deliver c. 2,000-3,500GWh in renewable electricity, which will contribute significantly to Ireland's target of 80% renewable electricity by 2030.
- Measures to support community participation, such as dedicated community auctions and a community support fund. This is intended to ensure that communities can benefit directly from the development of renewable energy projects in their area.
- Competitive auction scheme which means that developers compete to offer the lowest price for their projects. This helps to ensure that consumers get the best possible value for money when it comes to renewable energy.
- Support the development of a diversified renewable energy portfolio, which will help to reduce Ireland's reliance on imported fossil fuels and improve the security of the electricity supply.

In addition to these key policy objectives, RESS 3 is also expected to have a number of other positive benefits, including:

- The development and operation of renewable energy projects is expected to create a significant number of jobs in the Irish economy. This is particularly important in rural areas, where many renewable energy projects are located.
- RESS 3 is expected to stimulate innovation in renewable energy technologies, as developers compete to offer the most cost-effective and efficient projects. This will benefit Ireland in the long term, as it will help to reduce the cost of renewable energy and make it more competitive with fossil fuels.
- Reduce greenhouse gas emissions and help Ireland to meet its climate change commitments.

Overall, RESS is a well-designed policy initiative that is expected to have a significant positive impact on Ireland's transition to a clean energy future. The scheme is well-aligned with Ireland's national and international policy commitments on renewable energy and climate change, and it addresses some of the key challenges associated with the development of renewable energy projects.

4.9 Conclusion

The policies, objectives and legislation as described throughout this chapter will set out all significant international, European, national and local policy support for a move to renewable energy technologies and a reduction in greenhouse gas emissions. Ireland is committed to meeting International and European targets and if these targets are not met the government must purchase Carbon Credits to meet compliance with both emissions and renewable energy targets or face fines from the EU.

The SEAI report, Energy in Ireland (2020a) sets out the nation's latest progress towards renewable energy targets, with an overall shortfall on the 2020 targets as renewable energy production accounts for approximately 12% of the nation's energy production while the 2020 target was set for 16%.

While Ireland has come a long way in increasing renewable energy generation, the targets are ever increasing from a European perspective. 2050 European targets effectively mean that Europe's energy production will have to be almost carbon-free by 2050, with an aim to increase reliance on renewables from 30% to 70% by 2030.

In response to this, Ireland produced the Climate Action Plan 2023 in which this CAP23 sets out an objective to more than double Ireland's onshore wind energy capacity to 9 GW by 2030, in order to meet new renewable energy targets and reduce emissions. Therefore, there is a clear national mandate to accommodate significant onshore wind within the next decade. Furthermore, the National Planning Framework, which is currently under review as outlined in section 4.4.5, above, places greater emphasis on a move to a low-carbon economy to reduce Ireland's carbon footprint by integrating climate action into the planning system in support of national targets.

It is this commitment on energy and climate policy that justifies a clear need for renewable energy generation in Ireland. It is recognised that there are a range of renewable resources alternatives that could be explored to meet our International and European commitments, however onshore wind is recognised as being a key to achieving this as emphasised in the Climate Action Plan 2023. It is also a proven technology that will be critical to meeting the near-term renewable targets up to 2030.

The Regional Spatial and Economic Strategy (RSES) for the Southern Region supports the increased use of renewable energy sources to transition the Southern Region to a low carbon, climate resilient and environmentally sustainable economy and mitigate against climate change. The RSES aims to leverage the Southern Region as a leader and innovator in sustainable renewable energy generation, supporting the development of a renewable energy project in an appropriate location, such as that of the Proposed Development.

National and regional energy policies have been reinforced by the Waterford City and County Development plan 2022-2028 which applies a plan-lead approach to wind energy development. In conclusion, the policy context for the site and surrounding area is considered favourable for the Proposed Development, both from a national policy perspective with regard to renewable energy provision, and at a local level with respect to designations and the ability for the site to accommodate the Proposed Development.

In relation to Renewable Energy, the Waterford City and County Development Plan 2022-2028, Chapter 6, Section 6.9 Utility, Energy & Communication Policy Objectives indicates that the Plan supports the delivery of sustainable sources of energy. Chapter 6 further outlines Waterford's approach to meeting the County's share of national renewable energy target of 15.5GW, with an onshore wind energy target of 9 GW. Within the lifetime of the Waterford City and County Development Plan 2022-2028, Waterford aims to deliver c. 2.64% of the onshore wind energy growth requirement (Waterford comprising 2.64% of the land mass of the Republic of Ireland), which equates to +211.20 MW.

The Proposed Development site was chosen as the result of a feasibility study which analyzed the constraints of the site, the surrounding environmental and other material factors pertinent to the current Waterford City and County Development Plan 2011-1017. Following the conclusion of the feasibility study, the Proposed Development site was deemed suitable on the basis on the criteria as provided within the previous County Development Plan 2011-1017 - Wind Energy Designation Map 2016-203.

The current Wind Energy Strategy of the Waterford County and City Development Plan 2022 – 2028 includes three classifications which are Exclusion, Preferred and Open to Consideration, with the Proposed Development within the area designated as 'Exclusion'. This designation contrasts with the previous Waterford County Development Plan 2011- 2017 'Waterford Renewable Energy Strategy', which designated the Proposed Development and surrounding landscape as an area 'Open to Consideration' in relation to wind energy development.

The Landscape and Seascape Character Assessment subdivides the counties landscape into 7 landscape character types (LCTs) and a subsequent 28 landscape character units. The Proposed Development is located across three sensitivity classifications which are 'Most Sensitive,' 'High Sensitivity' and 'Low Sensitivity.' The development is located in an area with varying landscape sensitivities; Most Sensitive, High Sensitivity and Low Sensitivity. The Proposed 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.

The Proposed Development conflicts with the most recent iteration of Waterford Renewable Energy Strategy - Wind Energy Designation Map as per the Waterford City and County Development Plan 2022-2028. However, where the LCT aligns with the Waterford County and City Development Plan 2022 – 2028, and by extension the Renewable Energy Strategy 2016 – 2030, which has changed from an "*Open to Consideration*" to a "*Exclusion*" area, the Proposed Development 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.

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