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PLANNING STATEMENT FOR THE PROPOSED COUMNAGAPPUL WIND FARM, CO. WATERFORD

Planning Statement

Prepared for:
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1. INTRODUCTION

The Irish Government declared a climate emergency in May 2019 and has set ambitious targets, most recently under the Climate Action Plan 2023, for the reduction in greenhouse gas emissions with the aim of achieving a net zero economy by 2050.

Key to achieving this net zero / carbon neutral ambition is the decarbonisation of many sectors of the economy. For the energy sector, Ireland has set a target of meeting 80% of electricity consumption from renewable power by 2030, with 9 GW to come from onshore wind energy developments. Coumragappul Wind Farm Limited (the Applicant) believes that in order to meet this ambitious target, that it is imperative that renewable energy developments such as the Coumragappul Wind Farm (the Proposed Development, as described in detail within Chapter 2 Development Description of the EIAR) are consented. This sentiment is echoed in the recent EPA publication¹ which prescribes the need for *“further and rapid expansion in wind energy”* in order to meet the 2030 Climate Action Plan target. More recently, on 06th September 2023, the United Nations Secretary-General released a press statement indicating that climate breakdown has begun and requiring that *“surging temperatures demand a surge in action. Leaders must turn up the heat now for climate solutions. We can still avoid the worst of climate chaos — and we don’t have a moment to lose”*.

The Proposed Development, to be located in the functional area of Waterford City and County Council, comprises 10 turbines at a tip height of 185m, connecting to the National Electricity Grid, with a proposed output of 72MW. The Proposed Development will contribute to supplying the demand for renewable energy and reduce dependency on fossil fuels resulting in lower carbon dioxide (CO₂) output, which in the context of the ongoing climate emergency is an urgent national priority.

The Applicant intends to utilise contemporary wind turbine technology for the Proposed Development thus ensuring the greatest energy capture feasible for the Site, which will be significantly greater than existing operational wind farms within the County on the basis of using turbines with a larger tip height, larger rotor diameter and larger rated capacity. Combining a substantial number of wind turbines yields cost efficiencies, allowing for a reduction in the quantity of turbines deployed at the wind farm². This, in turn, leads to cost savings for consumers in the provision of electricity. Moreover, meticulous consideration has been given to ensuring that the wind farm is of sufficient scale, strategically located, and equipped with advanced technology to optimize wind energy generation while minimizing adverse environmental impacts. Consequently, this development carries favourable implications for electricity affordability and environmental sustainability.

The Applicant believes that the Proposed Development is acceptable in terms of the Waterford City and County Council Renewable Energy Strategy 2016-2030 *“to maximise the opportunities for renewable energy development whilst safeguarding the environment and other amenities”* and is compatible with strategic land use policies to protect landscape, water, ecological resources and residential amenity. There is a positive presumption in favour of renewable energy projects at National, Regional and Local levels as reflected in the Wind Energy Development Guidelines for Planning Authorities, 2006, and regional planning guidelines such as the Southern Regional Spatial and Economic Strategy 2020-2026 and Waterford City and County Development Plan 2022-2028.

¹ EPA (June, 2023) Ireland's Greenhouse Gas Emissions Projections 2022-2040

² The average minimum price at which the electricity generated by the asset is required to be sold in order to offset the total costs of production over its lifetime.



The Proposed Development has been sited and designed sympathetically to reduce potential significant effects on the environment and community. The development process adopted by the Applicant has represented a best practice approach to the responsible development of a renewable energy project, minimising the potential environmental impact by utilising existing internal access road infrastructure and through multiple design iterations and modifications to minimise the impact on the receiving environment, particularly visual effects, and ensure compliance with planning policy. The current low intensity agriculture land use at the Site can be retained and can continue in unison with Proposed Development. The layout and siting of the Proposed Development presented in the Planning Application and EIAR represents the optimum fit with the technical and environmental parameters of this project.

The design of the Proposed Development recognises the importance of the surrounding habitat and has sought to minimise effects upon biodiversity by the avoidance of areas of greater habitat and species diversity/rarity/sensitivity and by minimising the development footprint by optimising earthworks having regard to site topography. Proposals for habitat enhancement are targeted towards the retention of good quality grassland habitat within the Site and also towards the achievement of a biodiversity net gain by improving an off-site area which is currently under more intensive agriculture usage. Additionally, measures for aquatic habitat enhancement have been incorporated into watercourse crossing design. As such the Habitat Management Plan for the Proposed Development will provide ecological conservation of the Site for the long term and build ecological corridors in the wider environment.

The construction and operation of the Proposed Development will bring economic benefit at a national, regional and local level. It will support the construction industry and reinforce the existing local renewable energy industry knowledge and skills base; create opportunities for new supply chain jobs; provide stability to the local rural economy; and stimulate further industry investment and diversification. Additionally, the Proposed Development will provide a local community benefit fund which will assist in the attainment of social and environmental objectives for the area.

This Planning Statement has been prepared by Fehily Timoney and Company on behalf of the Applicant to accompany an application under Section 37E of the Planning and Development Act 2000, as amended, in respect of the Proposed Development.

This Planning Statement considers the Proposed Development's accordance with the principle of Proper Planning and Sustainable Development having regard to relevant national, regional and county-level energy and land use and planning policy and Ministerial guidelines.

This Planning Statement is structured as follows:

- Section 1: Introduction
- Section 2: Development Context
- Section 3: National Interest and Strategic Importance
- Section 4: Development Plan Policy Appraisal
- Section 5: Material Planning Considerations
- Section 6: Conclusion



Fehily Timoney and Company was appointed to undertake an Environmental Impact Assessment of the Proposed Development which has been undertaken in accordance with the EIA Directive (Directive 2011/92/EU, amended by Directive 2014/52/EU) to determine and evaluate the potential effects of the Proposed Development. An Appropriate Assessment of whether the Proposed Development, alone or in combination with any other plan or project, will have an adverse effect on the integrity of any European Site forming 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. A Natura Impact Statement (NIS) is submitted with this application to assist An Bord Pleanála's appropriate assessment. This Planning Statement is supplementary to, and should be read in conjunction with, the EIAR and NIS submitted in support of the Section 37E planning application.



2. DEVELOPMENT CONTEXT

This section of the Planning Statement sets out a description of the Proposed Development, the site where it is proposed (the Site) and its surroundings to include the Grid Connection Route (GCR) and the Turbine Delivery Route (TDR).

2.1 Proposed Development

The general components of the Proposed Development are set out hereunder, with exact detail provided in the EIAR and Planning Application:

- Construction of 10 no. wind turbines with a blade tip height of 185 m, a hub height of 104 m and a rotor diameter of 162 m.
- Construction of permanent turbine foundations and crane pad hardstanding areas and associated drainage;
- Construction of 1,17.71 m of new internal access tracks and associated drainage infrastructure;
- Upgrading of 11.46 m of existing tracks and associated drainage infrastructure;
- Creation of 1 no. new construction and operation access to the wind farm Site;
- Creation of 1 no. new construction and operation access to the permanent meteorological mast;
- All associated drainage and sediment control including interceptor drains, cross drains, sediment ponds and swales;
- Installation of new watercourse crossings including a 15m single span bridge crossing, an open bottomed culvert and a piped culvert;
- Removal and replacement of existing culverted watercourse and drain crossings along the cable route;
- Construction of 1 no. permanent onsite 110kV electrical substation and associated compound including:
 - Welfare facilities;
 - Electrical infrastructure;
 - Parking;
 - Wastewater holding tank;
 - Rainwater harvesting tank;
 - Security fencing;
- All associated infrastructure, services and site works including excavation, earthworks and spoil management;
- Development of 1 no. on-site borrow pit (150m L X 100m W /X 14m D) and associated ancillary drainage which will also act at a peat /spoil deposition area;
- 2 no. temporary construction compounds and associated ancillary infrastructure including parking;
- Forestry felling of 5.4 ha (53,995m²) to facilitate construction and operation of the proposed development;
- Installation of medium voltage electrical and communication cabling underground between the proposed turbines and the proposed on-site substation and associated ancillary works;



- Installation of 22.47 km of high voltage (110kV) and communication cabling underground between the proposed on-site substation and the existing Dungarvan Substation and associated ancillary works. The proposed grid connection cable works will include 6 no. existing watercourse and drain crossings, three of which will be crossed by Horizontal Directional Drilling. The grid also includes the installation of 30 no. pre-cast joint bays.
- Erection of 1 no. permanent meteorological mast to a height of 110m above ground level with a 4m lightning pole on top.
- Temporary enabling works to accommodate turbine delivery
 - Load bearing surfaces and temporary watercourse and drain crossings
 - Temporary removal of road signage, utility poles, bollards and fencing.

A 10-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), after which it would be decommissioned and the turbines dismantled and removed, unless further consent is secured to operate for an additional time period.

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.

2.2 The Site

2.2.1 Existing Land Use

The Proposed Development Site is located along the transitional western foothills of the Comeragh Mountains and is contained within a horseshoe ridge that opens to the south. The Site's elevation ranges between c. 2250-45,200m AOD, with the most elevated locations along the eastern extents of the Site.

The landscape to the north, west and south of the Site are heavily influenced by more typical transitional rural land uses such as pastoral farmland and extensive areas of commercial conifer forestry. To the east of the Site, land use is influenced by upland land topography with extensive areas of moorland and heath and rocky outcrops along the most elevated mountaintop summits.

The wider environment's predominant land use is pastoral farmland, whilst blocks of commercial conifer forestry occurs throughout the transitional foothill landscape.

2.2.2 Environmental and Community Considerations

The approach to the consideration of alternatives and to the design of the Proposed Development has been to avoid, reduce or mitigate likely significant adverse effects in order that the Proposed Development does not impose disproportionate effects on the community and environment.



Landscape and Visual Considerations

Chapter 16 of the EIAR presents the findings of the landscape and visual impact assessment of the Proposed Development. The EIAR assesses the capacity of the area to visually absorb the Proposed Development considering the local and wider visual amenity value and landscape sensitivity; having regard to the scale of the Proposed Development and suitability of the site layout relative to its landscape context; and considering the degree to which the Proposed Development will alter the existing landscape in the context of natural visual screening.

The Site is located within a horseshoe shaped mountain ridge along the western foothills of the Comeragh Mountains which is designated as an 'Upland' landscape type in the 'Waterford Landscape and Seascape Assessment 2020'. This area is bordered to the north, south and west by 'Foothills' landscape type. The 'Upland' landscape is identified as having a 'Most Sensitive' Landscape Character and this classification transitions immediately to a 'Low Sensitivity' classification in the 'Foothills' landscape. The Waterford Landscape and Seascape Assessment 2020 defines the 'Most Sensitive' landscape as areas that *"... 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"*.

The EIAR has determined that the most notable visual impacts from the Proposed Development will occur within the immediate surrounds of the turbines at local residential receptors to the south of the horseshoe ridge that contains the Site. The Proposed Development is located within a sparsely populated area. The residents at this location will have the highest visual impact of 'Substantial-moderate'. Whilst the turbines will be one of the most distinctive features of the view for these residents, they do not present with any notable sense of overbearing and do not appear over-scaled when viewed in combination with the surrounding broad landscape features and land uses.

Due to the location of the Proposed Development adjacent to the two notable upland areas, the Comeragh and Monavullagh Mountains and the Knockmealedown Mountains, there is a notable degree of local scenic amenity. It is important to note that large sections of the Comeragh Mountains will be entirely screened from the proposed turbines, especially the eastern extent of the Comeragh Mountains, which comprise several highly susceptible landscape areas and features such as Coumshingaun Loch and Mahon Falls. The EIAR has assessed that while clear distant views of the Proposed Development will be afforded from scenic routes, due to the distance from the site, natural screening provided by topography and sub-dominant visual presence of the development against the panoramic upland backdrop, the associated visual effect would not be deemed to be significant.

Whilst the turbines will be dominant features in the local landscape, impacts beyond this will reduce quickly to 'Moderate' and 'Moderate-slight', as the horseshoe ridge and surrounding upland landscape context will screen and partially contain the overall perceived scale of the proposed wind farm development from surrounding receptors. Furthermore, even when clearly visible from surrounding receptors outside of the immediate site context, the proposed turbines generally present in a compressible manner and are well accommodated in this broad landscape context that comprises large-scale landscape features and broad transitional land uses.



Notwithstanding, the capacity of the area to visually absorb the Proposed Development, the Waterford Renewable Energy Strategy 2016-2030 has included the lands within a broad 'Exclusion Area' for wind energy development. This 'Exclusion Area' carpets a large portion of the Comeragh, Monavullagh and Knockmealedown Mountains. It is important to note that the full extent of the 'Exclusion Area' does not directly correspond with the 'Most Sensitive' landscape sensitivity classification identified in the current Waterford County Development Plan. Indeed, an area designated as 'Preferred' in the eastern extents of the Comeragh Mountains is located within the aforementioned 'Most Sensitive' landscape classification.

Biodiversity and Heritage Considerations

The ecological and ornithological assessment of the Proposed Development has been informed by several years of habitat survey (including relevé survey), mammal survey, fishery survey and bird survey.

The Proposed Development is located within upland habitat wholly outside of any national or European designated areas. The nearest designated area is the Comeragh Mountains SAC which is located 0.74km to the east of the Site. The NIS prepared for the Proposed Development, either alone or in combination with any other plan or project, concluded no potential for adverse effects on the integrity of any European Site.

Within the Site, vegetation is dominated by wet heath with smaller areas of dense bracken, exposed rock, agricultural grassland, conifer plantation and dry heath. The majority of the heath habitat is in poor condition due to overgrazing and regular burning, with none of the habitats within the Site corresponding to Annex I type Habitats (all habitats being of local importance only). There are very few treelines or hedgerows within the Site, with the agricultural fields delineated by electric fencing and most of the heathland grazed by free roaming sheep. The long term loss of habitat associated with the Proposed Development is assessed in the EIAR to have a slight significance. Nevertheless, a Habitat Management Plan has been prepared which outlines measures for the management of grassland and heath habitats and enhancement of fishery habitat at watercourse crossings.

The EIAR concludes no potential for significant effects on protected species. All in-stream works associated with watercourse crossings will be carried out under dry works conditions in order to protect water quality and fishery value of the watercourses which are known to support salmonid, eel and lamprey species. The landscape is open and has a generally low suitability for bats and other mammals given vegetation type and rocky nature of the upland habitat. Signs of otters have been recorded in the Colligan River Catchment downstream of the Site. There are no bat roosts within the Site and the turbine infrastructure is set back appropriately from any potential bat roost structures outside of the Site. Similarly features on the watercourses that might provide resting or breeding opportunity for otters will not be impacted by the Proposed Development both due to the location of the watercourse crossings and due to their design which includes for retention of bankside vegetation on suitable watercourses. There is no anticipated requirement for a derogation under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations, 2011 (as amended) to disturb / destroy the breeding or resting place of any species listed in Annex IV of the Habitats Directive.

Ornithological assessment notes the potential for temporary disturbance to ground-nesting species such as meadow pipit (which have been recorded breeding at the Site) as may be caused by construction activities and also by reduction in habitat area. The negative effects of ongoing burning at the uplands are also noted for such species. The Habitat Management Plan for the Site will mitigate for these effects which have been assessed as being moderate significance. For the operational phase of the Proposed Development, potential long-term slight effects on kestrel have been identified due to collision risk. A programme of post consent monitoring is proposed.

The design of the Proposed Development recognises the surrounding habitat value and has sought to minimise effects and enhance biodiversity.



In terms of archaeological heritage, the layout of the Proposed Development has been designed to avoid the locations of the three nearby recorded archaeological sites and the construction phase will not result in any predicted direct effects on the known archaeological resource. There are no recorded archaeological sites located within 200m of any development areas within the Site.

There were three previously unrecorded features of cultural heritage potential identified within the Site during the compilation of the archaeological assessment as part of the EIA. These comprise a drystone structure (with an associated field) which is of vernacular heritage interest, an upright stone of archaeological potential and a cluster of four small field clearance cairns which may be of recent origin. These will not be impacted by the Proposed Development.

Flood and Water Quality Considerations

The Proposed Development is not located within areas of Flood Zone A, B or C and there will be no impact on floodplain storage or fluvial flood flow routes as a result of the Proposed Development given that drainage design has considered impacts to changes to hydrological regime and will employ Sustainable Urban Drainage Systems (SuDS) standards sized to the 1 in 100 year event.

The infrastructure has been located such that it is set back as far as reasonably practicable from hydrological features, with a commitment of achieving a minimum setback of 75m between mapped surface water features and wind farm infrastructure, and a minimum setback of 15m from streams and drainage features with the exception of HDD locations and watercourse crossings. Notwithstanding, and having regard to the location of the Proposed Development within a Blue Dot Catchment, the EIAR has prescribed mitigation for the control of potentially polluting materials which might impact the physico-chemical conditions for surface waters in the catchment.

Community Considerations

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 Developer will set up a community benefit fund which will allocate funds to community groups in the area should the Proposed Development be granted planning permission and be successful under the Government's Renewable Electricity Support Scheme (RESS).

The development benefits to the local community would include significant investment in local infrastructure and electrical systems, local job creation, and a contribution of approximately €21 million in Waterford City and County Council rates over the project lifetime of 40 years.

2.2.3 Site Selection Rationale

The Proposed Development Site has been selected by the Applicant as a preferable location for onshore wind energy development on the following basis:

- Desk-based assessment and meteorological monitoring on site has demonstrated that there is a good wind resource at this location;



- At the time of consideration, the lands were identified as being within an 'Area Open for Consideration' for wind energy development as defined in Waterford County Council Wind Energy Strategy, part of the County Development Plan 2011-2017. The capacity of the landscape to accommodate the development of large infrastructure was considered. It is acknowledged that the lands have since been assigned an 'Exclusion Area' categorisation for wind energy development in the recent Waterford Renewable Energy Strategy 2016-2030;
- The Site is located fully outside of any areas of national or European heritage designation;
- There is a low residential density in the area of the Proposed Development and the Site is reasonably separated from properties. The housing pattern relative to topography provides good natural screening of the Site. Additionally, given the upland nature of the area, there is limited opportunity for future residential development through ribbon development / suburbanisation in the locality;
- There is very limited potential to interfere with existing land use given that low intensity agriculture and forestry practices can continue at the Site;
- There is adequate port and road infrastructure local to the Site to enable the transportation of large heavy goods vehicles / abnormal loads (in particular large turbine blades) thereby allowing best use of the available wind resource;
- Consideration was given to the carrying capacity and safety of the road network serving the Proposed Development and adequacy of sight distances at the vehicular entrances to the Site. The Site will be accessed from the local road network, and as such achieved the Waterford County Development Plan objective to avoid the creation of any additional access points from new development to National Roads.
- The potential to win construction material from within the Site was considered such that the need for haulage is significantly reduced. The Proposed Development will source all structural fill for construction from within the on-site borrow pit instead of local quarries which will reduce the impact on the local road network;
- The safety of the Site itself was considered in terms of ground stability and flood risk. The Site is fully outside of any flood zone and peat depths are shallow and underlain by strong siliceous rock;
- Potential for the positioning of turbines at this location to interfere with aeronautical and telecommunication transmission is low;
- Viability of grid connection;
- An essential element of the search for potential sites was the interest of landowners in onshore wind energy development. In that regard, and taking the criteria above into account, the site initially became a viable proposition for the Applicant following discussions with the landowners, who were interested in exploring the potential of such a development on their estate. Letters of Consent are included in the planning application.

The Proposed Development infrastructure has been designed around considerations of technical, economic and environmental constraints. Careful consideration has been given to the layout of the Proposed Development, which is demonstrated in the design evolution process. This is set out in the EIA Report Chapter 3. The wind farm design and layout were adapted and altered in response to environmental constraints and consultation feedback. The Proposed Development went through a series of design iterations. Changes to the layout included decreasing the number of turbines and changing turbine positions. It is considered the final design balances the optimum productivity while minimising the environmental impact and will make a valuable contribution to the Irish Government's renewable energy and carbon reduction targets.



3. NATIONAL INTEREST AND STRATEGIC IMPORTANCE

3.1 Need for the Development

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

3.1.1 United Nations Framework Convention on Climate Change

The United Nations Framework Convention on Climate Change (UNFCCC) is an international environmental treaty negotiated at the United Nations Conference on Environment and Development (UNCED), in Rio de Janeiro in 1992. Its ultimate objective was to achieve "... stabilisation of greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system (United Nations, 2013) " There are 195 parties ratified to the Convention and these are subdivided into Annex I, Annex II, Annex B, Non-Annex I and Least Developed Countries.

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.

3.1.2 Climate Emergency

The Climate Action and Low Carbon Development Act was published in January 2016 by the then Minister for Environment, Heritage and Local Government. The Act sets out the national objective of transitioning to a low carbon, climate resilient and environmentally sustainable economy in the period up to and including the year 2050. The Act provides for a solid statutory foundation to the institutional arrangements necessary to enable the State to pursue and achieve the "national transition objective".

In May 2019 the Irish Government declared a climate and biodiversity 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 Climate Action Plan 2019 on 17th June 2019. The Plan acknowledges that decisive and urgent action is required to arrest the acceleration of greenhouse gas emissions and includes a new commitment to make Ireland 100% carbon neutral by 2050 and meeting 70% of this increased electricity demand, from renewable sources, all by 2030.

The Climate Action and Low Carbon Development (Amendment) Act 2021, signed into law 23rd July 2021, is an Act to provide for the approval of plans by the Government in relation to climate change for the purpose of pursuing the transition to a climate resilient, biodiversity rich and climate neutral economy by the end of the year 2050. The Act embeds the process of carbon budgeting into law, with the Government required to adopt a series of economy-wide five-yearly carbon budgets to include sectoral targets for each relevant sector on a rolling 15-year basis. The Act also requires for all Local Authorities to prepare individual Climate Action Plans which will include both mitigation and adaptation measures, representing a mandate for Local Authorities to adapt to climate change.

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. 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 outlined below.

CAP23 sets out an objective to more than double Ireland's onshore wind energy capacity to 9 GW by 2030 (with 6 GW by 2025) in order to meet new renewable energy targets and reduce emissions. The policies and objectives of the CAP are reflected in the *National Energy & Climate Plan (NECP) 2021-2030*, submitted to the European Commission.

Ireland is facing significant challenges in efforts to meet these targets alongside its commitment to transition to a low carbon economy by 2050.

3.1.3 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.

3.1.4 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.



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.

3.1.5 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 (2022-2040)’ 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) and Climate Action Plan 21 are included in this scenario. Many Climate Action Plan 21 policies and measures are not in the WEM scenario as they are still considered to be planned rather than implemented. The WEM scenario projects that Ireland will only reach 68% renewable electricity share by 2030 (as opposed to the 80% required under CAP23).

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 have not yet moved into implementation phase. As implementation happens the policies and measures will be migrated into the With Existing Measures scenario. In this scenario it is assumed that by 2030 renewable electricity share increases to at least 80% (as set out in CAP23). This is mainly a result of further and rapid expansion in wind energy.

The SEAI Energy Data Portal³ reported that only 12.8% of all of Ireland’s energy supply came from renewable sources in 2022, of which approximately half came from wind energy developments (with approximately 4.3GW of installed wind energy capacity in Ireland in 2022). It is apparent from these figures that 80% target is ambitious and that as per the EPA greenhouse gas report, further and rapid expansion in wind energy is essential.

³https://www.seai.ie/data-and-insights/seai-statistics/energy-data/?gclid=CjwKCAjw6p-oBhAYEiwAgg2Pgud-IBDnzo8nBdDZf2qByOMcTb6t68kRdKMTRlvMrRpu5Bf_f4DiBoCY8kQAvD_BwE



3.2 Strategic Nature of the Proposed Development

The Board has determined by Decision Ref. ABP-309259-21 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. As a Strategic Infrastructure Development, the Development is anticipated to 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.

At a strategic level, the Proposed Development is supported by International, European, and National environmental and energy commitments and policies. The Proposed Development is firmly in the Irish national interest. It will make a valuable contribution to climate change adaptation and greenhouse gas reductions while also adding to Irish energy security reducing reliance on imported fossil fuels. 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.

In Chapter 4-Policy of the EIAR, a detailed analysis of these commitments and policies is outlined. This is in the context of substantial and continuing failure by Ireland in meeting climate targets to date, as copper fastened in the EPA's Greenhouse Gas (GHG) emissions projections for the period 2022-2040 as published on June 02, 2023, which indicates that Ireland will fall short its climate targets.

The renewable energy policy framework applicable as an important material consideration in the planning consent decision making process are set out hereunder.

3.2.1 National Development Plan 2021 – 2030

The National Development Plan 2021-2030 (NDP) published in October 2021, in tandem with the National Planning Framework (NPF), sets out the Government's over-arching investment strategy and budget for the period 2021-2030, and include policies, measures and programmes to achieve energy efficiency and climate objectives of the Climate Action Plan.

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. The NDP sets out investment priorities of €21.8bn for climate action and commits to increasing the share of renewable electricity up to 80% by 2030.

The NDP outlines a number of key energy initiatives, which set out to diversify our energy resources, and to assist in the transition towards a decarbonised society. The NDP emphasises National Strategic Outcome 8: *'Transition to a Climate-Neutral and Climate Resilient Society'*, noting that: *"The Government will continue to support the deployment of additional electricity generation through the auction-based Renewable Electricity Support Scheme (RESS)"*

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 Proposed Development will contribute to the aims of the NDP in providing renewable electricity generation to the national grid.



3.2.2 National Energy & Climate Plan 2021-2030

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 Governance Regulation is effectively the piece of EU legislation under which Ireland is held accountable in meeting its de-carbonisation targets.

The Commission has assessed these both at EU and Member State level. Member States are required to have updated 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. On the back of the progress report, the Council of the European Union in 2022 made a recommendation for Ireland⁴ as follows:

“Reduce overall reliance on fossil fuels. Accelerate the deployment of renewable energy, in particular offshore wind, including by introducing reforms to improve the efficiency of the planning and permit system, particularly by reducing the duration of procedures. Upgrade energy infrastructure, including for storage, and enhance the stability of the grid. Ensure the fast implementation of deep building retrofits. Accelerate the electrification of transport, including by installing charging facilities.”

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. The minimum target for onshore wind in Ireland by 2025 is a total installed capacity of 5900 MW, an increase of approximately 1,568 MW from the current installed capacity on the island (as of May 2022)⁵. 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.

3.2.3 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 National Planning Framework 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 safeguarding 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. Through its vision statement, the RSES seeks to:

- Nurture all our places to realise their full potential.
- Protect, and enhance our environment.
- Work to achieve economic prosperity and improved quality of life for all our citizens.
- Accommodate expanded growth and development in suitable locations; and
- Promote the region's international reputation as one of Europe's most creative, innovative, greenest and liveable regions.

⁴ https://energy.ec.europa.eu/system/files/2022-11/IE%202022%20Energy%20Snapshot_rev.pdf

⁵ 4,332 MW Installed Capacity in the Republic of Ireland as of May 2022 (Wind Energy Ireland)



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 1.2: 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.

Regional Development Monitor⁶ for the Regional Assemblies collates data on socio-economic and environmental indicators to present the performance of each of the three Regional Assemblies in terms of achieving the objectives outlined in their respective Regional Spatial and Economic Strategies (RSES). The ‘Renewable Energy’ Indicator identifies the Southern Region as hosting the highest number of wind farms (with the greatest MEC) in comparison to the other Regions. Within the Southern Region, the south eastern SPA (comprising counties Carlow, Kilkenny, Waterford and Wexford) has the lowest (current and known future planned) wind energy developments in terms of MEC, both within the Southern Region, and nationally. This indicates a potential disproportionality in terms of wind energy development at county-level across the island.

The Proposed Development of the Coumna Gappul Wind Farm 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.

⁶ <https://rdm.geohive.ie/>



4. DEVELOPMENT PLAN POLICY APPRAISAL

4.1 Proper Planning

This section provides an assessment of the Proposed Development against the relevant planning policies and objectives of the Waterford City and County Development Plan 2022-2028 which may have a bearing on the proper planning and sustainable development. This section of the Planning Statement considers the relevant policies having regard to the conclusions set out in the EIAR.

4.1.1 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. The Waterford City and County Development Plan 2022 - 2028 contains development management standards, policies and objectives and references statutory guidelines which will inform decision making from 2022 to 2028. The Waterford City and County Development Plan 2022 – 2028 is consistent with both the 'National Planning Framework' (2018) (NPF) and the 'Regional Spatial and Economic Strategy for the Southern Region' (2020) (RSES). The Waterford City and County Development Plan 2022 - 2028 will replace the following statutory development plans:

- Waterford City Development Plan 2013 - 2019 (as extended);
- Waterford County Development Plan 2011-2017 (as extended);
- Dungarvan Town Development Plan 2012 - 2018 (as extended).

The Waterford City and County Development Plan 2022 - 2028 sets out the strategy for the proper planning and sustainable development of the City and County and will be the first unitary Development Plan for the entire functional area of Waterford City and County Council. As such, it is therefore 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. Within the lifetime of the Waterford City and County Development Plan 2022-2028, Waterford aims to deliver 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 County Development Plan identifies that there is 62.87 MW of operational wind energy in the County with an additional 34.85 MW permitted but undeveloped (noting that planning permission has expired for many of these developments). As such there is an existing shortfall of a minimum 113.48 MW from the 211.20 MW County target. Additionally, it should be noted that this county target was based on the 8 GW national target which has since been increased to 9 GW under CAP23. Therefore, if using a land mass pre rata approach, the new target would be 237.6 MW. There is a current shortfall of 139.88 MW consented onshore wind energy in County Waterford to deliver the 2023 Climate Action Plan target of 9GW on a national basis (which accounts for permitted but undeveloped wind farms, notwithstanding that many have expired planning consents).

The Proposed Development, by contributing an anticipated 72 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 policies relevant to the Proposed Development are set out in Table 4-1. The Development has been assessed against these in order to illustrate compliance with the relevant policies.



Table 4-1: Key Policy / Objectives from Waterford City and County Development Plan (2022-2028)

WCCDP 2022-2028		Policy Details	Development Policy Accordance
Chapter - Policy			
Renewable Energy Strategy 2016-2030: Chapter 1 - 1.3	Energy	<p>Vision of Renewable Energy Strategy</p> <p>“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.”</p>	<p>The Renewable Energy Strategy 2016-2030 recognises the opportunity to benefit from increased renewable energy generation with limited additional environmental impacts and this is consistent with the findings of EIAR.</p>
Renewable Energy Strategy 2016-2030: Chapter 13.0	Energy	<p>Strategic Planning Considerations</p> <p>It is the policy of Waterford City and County Council to promote and support the development of renewable energy technologies most suited to Waterford, to seek to reduce dependency on fossil fuels thereby enhancing the environmental, social and economic benefits to Waterford City and County.</p>	<p>Chapter 4 - Policy describes how the Proposed Development will contribute towards Waterford achieving its carbon emission reduction targets and transition to a clean energy future. The policies are ambitious, but they are necessary to address the climate crisis. Waterford City and County Council is committed to implementing these policies, and it is working with stakeholders to develop a comprehensive and effective energy strategy for Waterford to achieve its climate goals and build a more sustainable future through:</p> <p>Working with energy providers to develop new renewable energy projects in Waterford.</p> <p>The Council can provide financial incentives for homeowners and businesses to improve their energy efficiency.</p> <p>The Council can develop a network of Strategic Energy Zones and District Heating systems to provide low-carbon heat to homes and businesses.</p>



WCCDP 2022-2028 Chapter - Policy	Policy Details	Development Policy Accordance
		<p>The Council can work with the Decarbonising Zone 'living laboratory' to learn how to reduce emissions from transport and other sectors.</p> <p>The Council can develop a smarter local energy model that uses data and technology to improve energy efficiency and reduce emissions.</p>
Chapter 6: Utilities Infrastructure, Energy & Communication	<p>Strategic Objectives</p> <p>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.</p> <p>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.</p>	As demonstrated throughout the EIAR, the Proposed Development will make a significant contribution to facilitate an expedient transition to a low carbon society in order to reduce energy related GHG emissions and contribute to meeting Ireland's binding EU 2030 and 2050 targets.
Chapter 6 – 6.4: Utility, Energy & Communication Policy Objectives	<p>Energy</p> <p>"Electricity demand in Waterford is projected to increase by between 5-7% on an annual basis. The installation of the two electrical grid infrastructural interconnectors in adjoining counties (Great Island, Co. Wexford, and Ballycotton and Knockraha, Co. Cork respectively) via Greenlink (Ireland - Wales sub-sea cable) and the Celtic Interconnector (Ireland-France sub-sea cable), offers security of electrical energy supply.</p>	<p>The Development will make a significant and meaningful contribution to renewable energy targets in the county.</p> <p>The additional renewable energy that the Development will generate will help support Ireland's wider low carbon transition helping to meet the additional electrical demand created by electrification of the transport and heating networks and growing tech industry installations such as data centres.</p>



WCCDP 2022-2028 Chapter - Policy	Policy Details	Development Policy Accordance
	<p>Waterford’s growth and development includes the need to make strategic and progressive progress toward accommodating the electrification of transport (e.g. Roll-out of EV charging infrastructure and hydrogen/ fuel cells etc.), and decoupling the heating and power sectors, as part of our efforts towards decarbonising our power system, whilst nonetheless ensuring that renewable electricity generation (currently chiefly supplied by wind and solar) and ‘dispatchable power’ can be balanced or ‘backed-up’ through conventional energy generation or energy storage. A focus on renewable energy will thus also require the integration and implementation of projects which provide a wider range of renewable energy sources, such as offshore and onshore wind/renewable energy, hydro, wave, biogas (i.e. anaerobic digestion) and heat.</p> <p>The Council supports the national policy shift to low carbon energy solutions for a greener future, as well as the need to enhance electrical generation and distribution infrastructure to ensure that current and future energy demands are met. Smart energy systems, and the conversion of the built environment into both a generator and consumer of energy, will also have a role to play.”</p>	
Chapter 6 – 6.6: Utility, Energy & Communication Policy Objectives	<p>Renewable Energy</p> <p>“The Council recognises the importance of developing renewable energy resources in the interest of delivering NZEB (Near Zero Energy Buildings) and the National Climate Change Adaptation Framework, Climate Action Plans and the Climate Action and Low Carbon Development (Amendment) Act, whilst also balancing this against the need to maintain, and where possible improve, environmental quality.”</p>	As described within Chapter 4 – Policy, the EIAR describes how the Proposed Development will contribute towards Waterford achieving its carbon emission reduction targets and transition to a clean energy future. The policies are ambitious, but they are necessary to address the climate crisis.



WCCDP 2022-2028 Chapter - Policy	Policy Details	Development Policy Accordance
Chapter 6 – 6.9: Utility, Energy & Communication Policy Objectives	<p>UTL 01: New Development and Strategic Development Growth Areas</p> <p>Ensure that new development across the urban and rural settlements of Waterford is infrastructure led in a manner which:</p> <p>Supports communities and economic growth and development, Enhances environmental quality,</p> <p>Complies with the tiered approach to land use zoning which underpins the Development Plan.</p> <p>Encourages and provides opportunities to improve and implement sustainable modes of travel.</p> <p>Integrates nature-based solutions and climate change considerations into the design, planning, and implementation of infrastructure provision/ works and development proposals.</p> <p>Incorporates green infrastructure to provide carbon offset and carbon sinks and wider environmental benefits, including providing shade to alleviate heat stress, supporting urban biodiversity, water retention and flood alleviation.</p> <p>Promotes and integrates energy efficiency and low carbon technologies and solutions; and,</p>	<p>Chapter 6 Population & Human Health outlines the Proposed 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.</p> <p>Local employment will be provided, as well as employment on local, national and international levels both directly and indirectly. Throughout the Proposed Development’s lifetime, employment will be both created on local, regional, national and international levels. Employees involved in the construction of the Proposed 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.</p> <p>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.</p>



WCCDP 2022-2028 Chapter - Policy	Policy Details	Development Policy Accordance
	<p>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</p>	
<p>Chapter 6 – 6.9: Utility, Energy & Communication Policy Objectives</p>	<p>UTL 12: Energy Strategy/ Masterplan</p> <p>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):</p> <p>A detailed and comprehensive energy assessment, incorporating a Spatial Energy Demand and Generation Analysis.</p> <p>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.</p> <p>Identifying specific opportunities and projects, actions and targets associated with improved energy efficiency.</p>	<p>Chapter 4 - Policy describes how the Proposed Development will contribute towards Waterford achieving its carbon emission reduction targets and transition to a clean energy future. The policies are ambitious, but they are necessary to address the climate crisis. Waterford City and County Council is committed to implementing these policies, and it is working with stakeholders to develop a comprehensive and effective energy strategy for Waterford to achieve its climate goals and build a more sustainable future through:</p> <p>Working with energy providers to develop new renewable energy projects in Waterford.</p> <p>The Council can provide financial incentives for homeowners and businesses to improve their energy efficiency.</p> <p>The Council can develop a network of Strategic Energy Zones and District Heating systems to provide low-carbon heat to homes and businesses.</p> <p>The Council can work with the Decarbonising Zone ‘living laboratory’ to learn how to reduce emissions from transport and other sectors.</p> <p>The Council can develop a smarter local energy model that uses data and technology to improve energy efficiency and reduce emissions.</p>



WCCDP 2022-2028 Chapter - Policy	Policy Details	Development Policy Accordance
	<p>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.</p> <p>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.</p>	
Chapter 6 – 6.9: Utility, Energy & Communication Policy Objectives	<p>UTL 13: Renewable Energy</p> <p>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:</p> <p>Supporting the delivery of renewable energy to achieve the targets identified in Table 6.2 of the Development Plan.</p>	<p>Chapter 6 Population & Human Health outlines the Proposed 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.</p> <p>Local employment will be provided, as well as employment on local, national and international levels both directly and indirectly. Throughout the Proposed Development’s lifetime, employment will be both created on local, regional, national and international levels. Employees involved in 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.</p> <p>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.</p>



WCCDP 2022-2028 Chapter - Policy	Policy Details	Development Policy Accordance
	<p>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, as well as use, reuse or re-powering of existing infrastructure where appropriate.</p> <p>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.</p>	<p>Wind energy is an effective nature-based solution to help tackle climate change internationally, where long-term positive imperceptible residual impacts will occur due to the provision of clean, renewable electricity. The operation of the Coumragappul Wind Farm will result in the net displacement of c. 46,358 tonnes of CO2 per annum which would otherwise be emitted through the burning of fossil fuels.</p> <p>As described previously within Chapter 16 - Landscape and Visual Impact Assessment (LVIA) of the EIAR, the Proposed Development will result in an intensification of wind energy development within this landscape context and within the surrounds of the Comeragh and Knockmealedown Mountains. The LVIA outlines the Proposed Development has the potential to be viewed in combination with other existing, permitted and development, however, it is well offset from any other wind farm developments and, thus, will present with no significant adverse cumulative visual effects. On balance of the reasons outlined within Chapter 16 Landscape and Visual Impact Assessment of the EIAR, and shown within Table 16.5, the Proposed Development is considered to contribute to a cumulative impact no greater than Low with other existing and permitted developments and no greater than Medium with existing permitted and proposed wind farm developments.</p> <p>The Proposed Development therefore broadly supports the WCCDP objectives.</p>



<p>WCCDP 2022-2028</p> <p>Chapter - Policy</p>	<p>Policy Details</p>	<p>Development Policy Accordance</p>
	<p>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, off-shore and onshore wind, biomass as well as micro-generation among business, agriculture, education, health, and other sectors.</p> <p>Promoting, encouraging, ensuring, and facilitating community engagement, participation and implementation of/ in renewable energy projects.</p> <p>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.</p> <p>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.</p> <p>The preparation and implementation of a Climate Action Plan (including adaptation and mitigation measures) for Waterford.</p> <p>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 off-shore renewable energy development when these are undertaken in an environmentally acceptable manner.</p>	



WCCDP 2022-2028 Chapter - Policy	Policy Details	Development Policy Accordance
	<p>At the 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.</p> <p>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.</p>	
Chapter 6 – 6.9: Utility, Energy & Communication Policy Objectives	<p>UTL 14: Energy Developments & Human Health</p> <p>Proposals for energy development should demonstrate that human health has been considered, including those relating to the topics of:</p> <p>Noise (including consistency with the World Health Organisations 2018 Environmental Noise Guidelines for the European Region);</p> <p>Shadow Flicker (for wind turbine developments, including detailed Shadow Flicker Study);</p>	<p>The Proposed Development has been assessed against each of the topics contained in The EIAR and adverse residual impacts are avoided.</p> <p>The planning application is accompanied by an EIAR and NIS which assess the potential impacts of the Proposed Development on the receiving environment and landscape.</p> <p>The EIAR submitted as part of the planning application has considered fully all the criteria listed under the following chapters:</p> <p>Chapter 3 - Site Selection and Alternatives Considered</p>



WCCDP 2022-2028 Chapter - Policy	Policy Details	Development Policy Accordance
	Ground Conditions/Geology (including landslide and slope stability risk assessment); Air Quality; and Water Quality	Chapter 4 - Policy Chapter 5 - EIA Scoping and Consultation Chapter 6 - Population and Human Health Chapter 7 - Air Quality and Climate Chapter 8 - Noise and Vibration Chapter 9 - Biodiversity Chapter 10 - Ornithology Chapter 11 – Soils, Geology and Hydrogeology Chapter 12 – Hydrology and Water Quality & FRA Chapter 13 - Shadow Flicker Chapter 14 - Traffic and Transportation Chapter 15 - Archaeology, Architectural and Cultural Heritage Chapter 16 - Landscape and Visual Impact Chapter 17 - Material Assets, Telecommunications and Aviation



WCCDP 2022-2028 Chapter - Policy	Policy Details	Development Policy Accordance
		<p>The design of the Proposed Development recognises the surrounding habitat sensitivity and has sought to minimise effects upon biodiversity throughout by proposing the reuse of existing infrastructure, and only increasing the net land take where it is absolutely unavoidable.</p> <p>Noise Impacts</p> <p>As described within Chapter 8 – Noise and Vibration, the closest inhabited dwelling is located 820m from the nearest turbine, with the only constructed windfarm that has the potential to be within 10dB of the Proposed Development is the single turbine at just over 5km from the Proposed Development. As this is greater than 10dB of the Proposed Development, this does not need to be considered.</p> <p>The potential cumulative impact from Dyrick Hill has been considered. Noise from the Tierney’s single turbine located c. 130m north of the Site has also been considered as part of this assessment. The 35 dB contour from cumulative noise from Coumnagappul, Tierney’s and Dyrick Hill windfarm is shown in Figure 8.3 of Chapter 8 – Noise and Vibration.</p> <p>The noise predictions assume that the noise sensitive locations are downwind of the wind farm. Therefore the predictions represent a worst case scenario. For noise sensitive locations located between Dyrick Hill Wind Farm and Coumnagappul Wind Farm, in reality these will not be downwind of both windfarms at the same time. Furthermore, the Dyrick Hill windfarm and Coumnagappul windfarm are being constructed by the same developer and would therefore have the ability to work within the noise criteria permitted for both sites.</p>



WCCDP 2022-2028 Chapter - Policy	Policy Details	Development Policy Accordance
		The cumulative operational noise meets the Wind Energy Noise Criteria as outlined in Chapter 8 – Noise and Vibration at all locations, except for a property 130m north of the Tierney single turbine (R158). Daytime criteria are exceeded by 4.4dB at lower windspeeds and 1.1 dB at higher windspeeds and the nighttime criteria is exceeded by up to 3.7 dB. It concluded that noise and vibration 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 Proposed Development without giving rise to significant noise impacts.
Chapter 6 – 6.9: Utility, Energy & Communication Policy Objectives	<p>UTL 19: Undergrounding Cables</p> <p>Where undergrounding of cables is being pursued, proposals should demonstrate that environmental impacts including the following are minimised:</p> <p>Habitat loss as a result of removal of field boundaries and hedgerows (right of way preparation) followed by topsoil stripping (to ensure machinery does not destroy soil structure and drainage properties).</p> <p>Short to medium term impacts on the landscape where, for example, hedgerows are encountered.</p> <p>Impacts on underground archaeology.</p> <p>Impacts on soil structure and drainage; and</p> <p>Impacts on surface waters as a result of sedimentation.</p>	As described within the EIAR, the design of the Proposed Development recognises the surrounding habitat sensitivity and has sought to minimise environmental impacts and effects upon biodiversity throughout by proposing the reuse of existing infrastructure, and only increasing the net land take where it is absolutely unavoidable.



WCCDP 2022-2028 Chapter - Policy	Policy Details	Development Policy Accordance
Chapter 6 – 6.9: Utility, Energy & Communication Policy Objectives	<p>ULT 21: Construction and Environmental Management Plan</p> <p>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:</p> <ul style="list-style-type: none"> 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. 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. 	<p>A Construction Environment Management Plan (CEMP) has been prepared to supplement an Environmental Impact Assessment Report (EIAR) for the Proposed Development. This meets the required County Council policy objective.</p> <p>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.</p> <p>Based upon the information provided the authors conclude the Proposed Development 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.</p>



<p>WCCDP 2022-2028</p> <p>Chapter - Policy</p>	<p>Policy Details</p>	<p>Development Policy Accordance</p>
	<p>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.</p> <p>details of appropriate mitigation measures for noise, dust and vibration, and monitoring of such levels.</p> <p>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).</p> <p>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).</p> <p>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.</p> <p>details of a water quality monitoring and sampling plan.</p> <p>if peat is encountered - a peat storage, handling and reinstatement management plan.</p> <p>measures adopted during construction to prevent the spread of invasive species (such as Japanese Knotweed).</p>	



WCCDP 2022-2028 Chapter - Policy	Policy Details	Development Policy Accordance
	<p>appointment of an ecological clerk of works at site investigation, preparation and construction phases and details of appropriate mitigation measures for lighting specifically designed to minimise impacts to biodiversity, including bats.</p>	
<p>Chapter 6 – 6.9: Utility, Energy & Communication Policy Objectives</p>	<p>ULT 24: Electricity Infrastructure “Subject to appropriate environmental assessment and compliance with the policy objectives and development management standards of the development plan, we will support and facilitate the development of a safe, secure and reliable supply of electricity, associated electricity networks and transmission infrastructure to serve existing and future demand.”</p>	<p>Appropriate environmental assessments have influenced the design of all elements of the Proposed Development such as electricity infrastructure (comprising the substation, grid connection etc.), with mitigation measures prescribed that, once implemented in full, will remove the risk of adverse effects posed by the Proposed Development to minimise environmental impacts and effects upon biodiversity.</p>
<p>Volume 2 - Development Management Standards - 5.24 Renewable Energy Developments</p>	<p>Development Management DM 31: The Waterford Landscape and Seascape Character Assessment</p>	<p>The Proposed Development has been assessed for its impacts with regards to the criteria outlined within ‘Development Management DM 31: The Waterford Landscape and Seascape Character Assessment’, also is assessed against 2006 Wind Energy Development Guidelines, the Waterford Renewable Energy Strategy and renewable energy targets set out in Table 6.3 of the Development Plan, which are described within this document and EIAR chapters:</p> <ul style="list-style-type: none"> • Visual impact particularly on raised/elevated sites.



WCCDP 2022-2028 Chapter - Policy	Policy Details	Development Policy Accordance
	<p>“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).</p> <p>In addition, potential applicants are advised to consult with the Department of Arts, Heritage and the Gaeltacht, The Forestry Service, The Irish Aviation Authority, Transport Infrastructure Ireland and the Spatial Planning and National Roads Guidelines for Planning Authorities 2012 and other appropriate statutory and non-statutory bodies in areas which may require special protection. In general, the Council will support wind energy proposals, provided such developments would not have an adverse effect on residential and rural amenities, special landscape character, views or prospects, Natura 2000 sites, protected structures, aircraft flight paths, or by reason of noise or visual impact. Applications for such developments will not be encouraged in areas of High Amenity.</p>	<p>As described within Chapter 16 - Landscape and Visual Impact Assessment (LVIA) of the EIAR, the Proposed Development will result in an intensification of wind energy development within this landscape context and within the surrounds of the Comeragh and Knockmealedown Mountains. Furthermore, existing wind energy development is an established feature within the wider study area (existing Woodhouse Wind Farm), whilst an existing single turbine is located just over c. 5km west of the Proposed Development. A permitted development (Knocknamona) is also located along the southern periphery of the study area, which will notably increase the number of turbines within the study area when constructed. Nonetheless, due to the near distance of the existing Woodhouse and consented Knocknamona turbines, they will be read as one large wind farm development. There is also potential for a proposed large-scale wind farm development on the foothills of the Knockmealedown Mountains in the wider western half of the study area (Dyrick Hill Wind Farm), which will further intensify the quantum of wind energy development within the study area and within the landscape that lies between the Comeragh Mountains and Knockmealedown Mountains. The Proposed Development has the potential to be viewed in combination with other existing, permitted and Proposed Development, however, it is well offset from any other wind farm developments and, thus, will present with no notable negative cumulative aesthetic effects. On balance of the reasons outlined within Chapter 16 Landscape and Visual Impact Assessment of the EIAR, and shown within Table 16.5, the Proposed Development is considered to contribute to a cumulative impact no greater than Low with other existing and permitted developments and no greater than Medium with existing permitted and proposed wind farm developments.</p>



WCCDP 2022-2028 Chapter - Policy	Policy Details	Development Policy Accordance
	<p>Whilst to date, applications for solar farms have concentrated on rural greenfield sites, large agricultural, commercial and urban area roof space, coupled with fast-changing technological advances in solar PV technology, have the potential to also comprise a viable alternative to supporting and accommodating proposed solar PV developments (e.g. lightweight solar film), without putting further pressure on Greenfield sites.</p> <p>At present, there are no national policy guidelines for solar farms. In the assessment of any applications for solar farms, the Council will consider such applications in accordance with the following criteria:</p> <p>Development Management DM 31:</p> <p>The Waterford Landscape and Seascape Character Assessment.</p> <ul style="list-style-type: none"> • Visual impact particularly on raised/elevated sites. • Archaeological Impact Assessment and Heritage Impact Assessment. • Zone of visual influence, and visual impact of the structures. • Glint and glare report and potential impact on adjoining road networks and dwellings. • Construction impacts, including road access and impact on road network serving the site during the construction phase (A pre and post construction impact report may be required). 	<ul style="list-style-type: none"> • Archaeological Impact Assessment and Heritage Impact Assessment. <p>Chapter 14 – Archaeology, Architectural and Cultural Heritage of the EIAR shows that the Proposed Development will not result in any direct negative effects to any known archaeological monuments or designated architectural heritage structures.</p> <p>In the event that any sub-surface archaeological remains are identified during the above site investigations, they will be cleaned, recorded and left to remain in situ within cordoned off areas while the NMS are notified and consulted in relation to appropriate future mitigation strategies, which may include preservation in situ (by avoidance) or preservation by record (archaeological excavation).</p> <p>The Proposed Development will result in slight, indirect visual effects on the archaeological monuments located within the environs of the Site during the operational phase which will be reversed following the decommissioning phase.</p> <ul style="list-style-type: none"> • Zone of visual influence, and visual impact of the structures.



WCCDP 2022-2028 Chapter - Policy	Policy Details	Development Policy Accordance
	<ul style="list-style-type: none"> • Incorporation of security measures – use of CCTV/surveillance cameras and security fencing, fencing proposals should be appropriate for wildlife through-access. • The suitability/strength of the grid and accessibility to it. • The suitability of the site, having regard to other land use policies, including the need to protect areas of important built and natural heritage. • Impact on drainage patterns and water tables. • Incorporation of green infrastructure elements and opportunities provided to enhance/ improve biodiversity and biodiversity linkages. • Decommissioning of obsolete infrastructure and after-use. <p>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 applicants should also consult with Waterford Airport plc and/or the Planning Authority prior to the advancement of such proposals.</p> <p>Other forms of renewable energy (e.g. hydro; geothermal; anaerobic digestion etc), can also play a part in the sustainable development of Waterford’s renewable energy mix, and the Council is generally supportive of these, subject to environmental considerations.</p>	<p>As outlined within Chapter 16 - Landscape and Visual Impact Assessment (LVIA) of the EIAR, a computer generated ‘Zone of Theoretical Visibility’ (ZTV) map has been prepared to illustrate where the proposed turbines are potentially visible from. The ZTV map is based solely on terrain data (bare ground visibility), and ignores features such as trees, hedges or buildings, which may screen views. Given the complex vegetation patterns within this landscape, the main value of this form of ZTV mapping is to determine those parts of the landscape from which the Proposed Development will definitely not be visible, due to terrain screening within the 20km study area. The ZTV is based on the 185m tip height of the proposed turbines, with further details shown in LVIA ‘Figure 16.12 Map showing scenic designations within the study area in the Waterford and Tipperary CDP overlaid on the ZTV map.’ and “Table 16.6 Rationale for selection of scenic designations within the current Waterford County Development Plan 2022-2028”.</p> <ul style="list-style-type: none"> • Potential impact on adjoining road networks and dwellings.



WCCDP 2022-2028 Chapter - Policy	Policy Details	Development Policy Accordance
	<p>Community ownership of wind, solar, and other renewable energy projects enable local communities to benefit directly from local energy resources being developed in their local areas, ensuring long term income for rural communities. The Council will encourage developers to positively engage with local communities in the design, proposal development and implementation of suitable developer-led renewable energy projects, be they in rural or urban locations.”</p>	<p>As outlined within Chapter 16 - Landscape and Visual Impact Assessment (LVIA) Section 16.4.2.2, The N24 and N25 are the most notable transport routes within the study area. The N25 traverses the eastern and southern extent of the study area and is located less than 10km southeast of the Site at its nearest point. The N24 is located along the northern extents of the River Suir and connects the settlements of Carrick-on-Suir and Clonmel within the northern half of the study area. The N24 is located some 12km north of the site at its nearest point. Other notable routes include the N72 national secondary route, located some 12km south of the site, whilst the N76 national secondary route is located some 13km north of the Site. It is worth noting that as per the ZTV above, considerable sections of all three of these routes will have no potential for visibility of the proposed turbines.</p> <p>The nearest major route to the Site is the R672 regional road, which is oriented in a north-south direction and is located some c.4km west of the Site at its nearest point. The R671 regional road is similarly located some c.4km west of the Site and is similarly oriented in a general north-south direction. Both of these regional roads have the potential to afford comprehensive views of the proposed turbines. The R676 regional road is situated on the eastern side of the Comeragh Mountains and is located some c.9km east of the Site at its nearest point and will be entirely screened from the Proposed Development. A network of interconnecting regional roads also traverses the wider study area, many of which converge at the principal settlements of Clonmel and Dungarvan. A dense web of local roads also cloaks the study area, the nearest of which are located a short distance to the west and south of the Site.</p>



WCCDP 2022-2028 Chapter - Policy	Policy Details	Development Policy Accordance
		<p>In relation to dwellings, Section 16.3.2 of the LVIA describes the nearest residential dwelling to any of the proposed turbines as 820m, which exceeds and fully complies with the setback distance outlined in the Draft Revised Guidelines (2019). It is important to note that the current Wind Energy Development Guidelines 2006 do not provide for a mandatory minimum setback distance between wind turbines and residential dwellings in terms of visual amenity. The minimum setback of 500m required in the current Wind Energy Development Guidelines relates to noise.</p> <ul style="list-style-type: none"> • Construction impacts, including road access and impact on road network serving the site during the construction phase (A pre and post construction impact report may be required). <p>Chapter 14 – Traffic and Transportation outlines that it is proposed that all roads will be reinstated expeditiously on completion of the construction works. Roads will be reinstated to their pre-works condition or better and to the satisfaction of the roads authority. For crossings where HDD has been identified as the preferred crossing method, open cut trenching methods will be permitted in dry conditions where there is no-flow in the watercourse and there is no risk of in-stream works. In such instances, cable ducts will be laid under the stream bed which will then be fully reinstated to its pre-existing condition.</p>



WCCDP 2022-2028 Chapter - Policy	Policy Details	Development Policy Accordance
		<p>A Route Survey Report (RSR) identifies the key issues associated with AIL deliveries and identifies remedial works, either in the form of physical works, vehicle modifications or traffic management interventions that will be required to accommodate the predicted loads. Vehicle modifications including suspension raises and increased ground clearance at vertical constraint locations are identified at the Sweep Crossroads (POI 18). No structural reinforcement of existing structures is predicted to be required to facilitate the delivery of the proposed loads along the TDR.</p> <ul style="list-style-type: none"> • Incorporation of security measures – use of CCTV/surveillance cameras and security fencing, fencing proposals should be appropriate for wildlife through-access. <p>Measures related to security measures and wildlife through-access are included within Chapter 8 – Biodiversity, with a ‘Biodiversity Enhancement & Management Plan (Appendix 8.7 of Chapter 8).</p> <ul style="list-style-type: none"> • The suitability/strength of the grid and accessibility to it. <p>As described in Chapter 14 – Traffic and Transportation, section 14.4.3.1, the underground grid route connection works from Coumragappul to Dungarvan substation will involve the installation of ducting, joint bays, drainage and ancillary infrastructure and the subsequent running of cables predominantly along the existing road network. These works will be progressive with short sections (up to several hundred metres in length) closed for short periods before moving onto the next section. This will require delivery of plant and construction materials to the sections along the route, followed by excavation, laying of cables and subsequent reinstatement of trenches and road surfaces.</p>



WCCDP 2022-2028 Chapter - Policy	Policy Details	Development Policy Accordance
		<ul style="list-style-type: none"> • The suitability of the site, having regard to other land use policies, including the need to protect areas of important built and natural heritage. <p>As described in Chapter 6 – Population and Human Health, the predominant land use of the Wind Farm Site consists of Moors and Heath Pastureland. The land use in proximity to the proposed grid connection is primarily agriculture characterized by one-off housing and the land use along the TDR is agriculture and town centre/village centre including a degree of forestry, residential and industrial premises. Thus, there will be a slight, temporary impacts to the existing land use along the GCR and TDR which is expected during the construction phase. During the operational phase, whilst there may be a change in land use in areas of the site and along routes where infrastructure is present and in transit, biodiversity mitigation measures including avoidance by design to reduce impacts on designated sites, flora and fauna which will help in further transitioning prior habitats post-construction.</p> <p>There are no Protected Structures or NIAH-listed buildings, or historic gardens/landscapes located in the Site or within 1km of its boundary. There are a number of examples located within properties located within a 100m corridor centered on the roadways along grid connection route and these are detailed in Section 14.3.3.3 of Chapter 14 – Archaeology, Architectural and Cultural Heritage.</p> <ul style="list-style-type: none"> • Impact on drainage patterns and water tables.



WCCDP 2022-2028 Chapter - Policy	Policy Details	Development Policy Accordance
		<p>Chapter 12 – Hydrology and Water Quality, Section 12.12, outlines how the residual impacts of the construction stage are Not significant and there will be no perceivable impact on the Colligan River and the Nier River which are highly sensitive receptors that are hydrologically connected to the Site, GCR and TDR. Furthermore, the Proposed Development will not result in the deterioration of the status of any waterbody under the WFD or jeopardize the achievement of waterbody objectives (good / high status) of any such waterbody.</p> <ul style="list-style-type: none"> • Incorporation of green infrastructure elements and opportunities provided to enhance/ improve biodiversity and biodiversity linkages. <p>Measures related to Incorporation of green infrastructure elements and opportunities provided to enhance/ improve biodiversity and biodiversity linkages are included within and Chapter 8 – Biodiversity of the EIAR, with the following reports included as Appendices with Chapter 8:</p> <p>Natura Impact Statement</p> <p>Marsh Fritillary Report</p> <p>Bat Surveys Report</p> <p>Ornithology Reports</p> <p>Aquatic Report</p> <p>Invasive Species Management Plan</p>



WCCDP 2022-2028 Chapter - Policy	Policy Details	Development Policy Accordance
		<p>Habitat and Species Management Plan</p> <ul style="list-style-type: none"> • Decommissioning of obsolete infrastructure and after-use. <p>As outlined within the EIAR, negative or adverse effects on the receiving environment associated with decommissioning works at the wind farm site are considered to be temporary in duration and not significant following mitigation.</p> <p>Negative or adverse effects on the receiving environment associated with the turbine delivery route are considered to be temporary in duration and not significant following mitigation.</p> <p>Infrastructure associated with the grid connection will form part of the national transmission network and will be left in-situ. Therefore, no impacts are envisaged upon decommissioning of the Proposed Development and no mitigation is required.</p>



4.2 Proposed Development in the Context of the Renewable Energy Strategy 2016-2030:

The strategic aims of the Waterford City and County Council's Renewable Energy Strategy 2016-2030: (RES) are to:

- 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.

The Renewable Energy Strategy includes mapping which identifies areas as 'Exclusion', 'Preferred' and 'Open for Consideration' for wind energy development. The Renewable Energy Strategy does not provide a definition for these terms. These areas have been identified by way of overlaying the following series of maps and data:

- The Landscape and Seascape Character Assessment;
- Natura 2000 network;
- Urbanised areas;
- Waterford Regional Airport Masterplan;
- Wind energy mapping of adjacent local authorities;
- Major road infrastructure; and,
- Transmission grid.

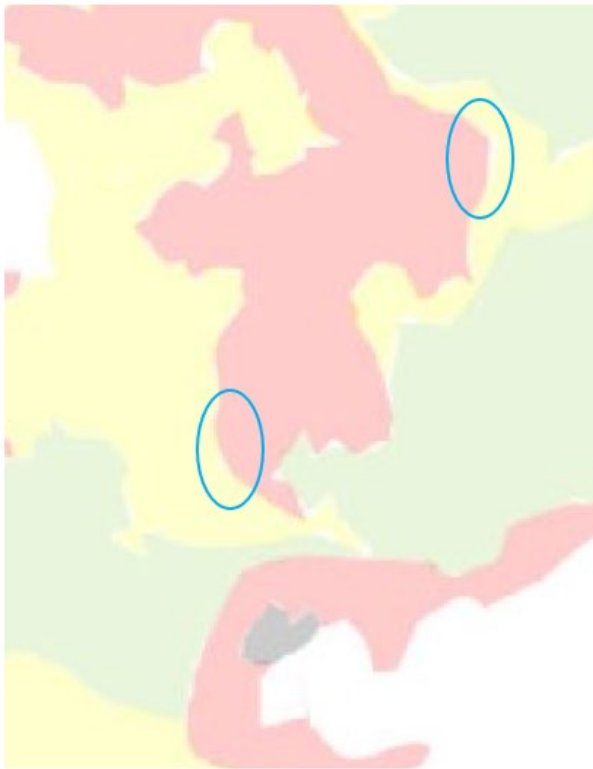
The Proposed Development is located within an area mapped as 'Exclusion' within the Renewable Energy Strategy (noting that this is in contrast with the previous version of the Waterford Renewable Energy Strategy which designated the Proposed Development Site and surrounding landscape as an area 'Open to Consideration' for wind energy development. The current Strategy has resulted in an overall decrease in area for potential wind energy developments). In this regard, the Proposed Development is located within an area identified as 'Most Sensitive' as per the Landscape and Seascape Character Assessment, is fully outside of the Natura 2000 network, is remote from urbanised areas and from the Waterford Regional Airport, is located in an area mapped in the RES as having between 8 m/sec and 9m/sec wind speeds @ 75m ITM, and is located in proximity to supporting road, port and grid infrastructure. As such, while it is not clearly stated in the RES, it is apparent from the review of the maps and data, that the designation of the Proposed Development lands as an 'Exclusion' area is dictated solely by the Landscape and Seascape Character Assessment for the area.

The Proposed Development is in accordance with the proper planning and sustainable development for the area. As set out in the supporting EIAR, the Proposed Development does not give rise to significant adverse effects on the constraints that gave rise to the 'Exclusion' designation for the Proposed Development area, namely Landscape Character.

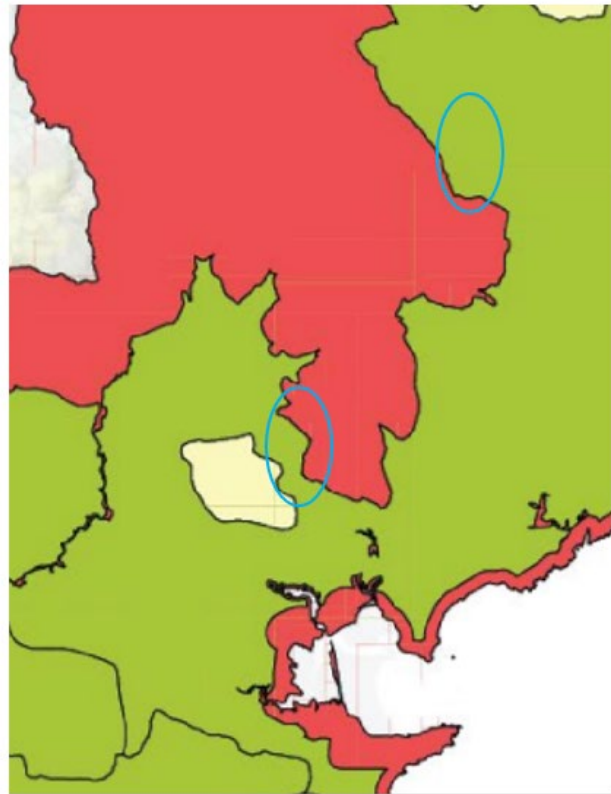


It is noted also that there is uncertainty surrounding the correlation between areas mapped as ‘Most Sensitive’ in the Landscape and Seascape Character Assessment and mapped ‘Exclusion’ areas in the Wind Energy Strategy. Image 4-1 shows areas (annotated by blue circles) within the Comeragh Uplands Landscape Unit, which are identified as Most Sensitive but which are mapped as Preferred areas for wind energy development. Additionally, there are areas mapped as Most Sensitive and Exclusion areas which encompass existing wind energy development e.g. the Barranafaddock wind farm is within the Knockmealdown Uplands Most Sensitive Landscape Character Area and is also a mapped Exclusion area for wind energy development.

Development Plan Policy Objective UTL 13 states: “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”. It is uncertain whether the ‘buffers’ as described in UTL 13 are accounted for in the Wind Energy Strategy mapping and how these buffers are determined, particularly given that ‘Preferred’ areas for wind energy development are mapped abutting immediately to ‘Exclusion’ areas.



Extract from Landscape and Seascape Character Assessment



Extract from Renewable Energy Strategy

Image 4-1: Comparative View of Seascape Character Assessment and Wind Energy Strategy

Volume 2 of the County Development Plan states that “In general, the Council will support wind energy proposals, provided such developments would not have an adverse effect on residential and rural amenities, special landscape character, views or prospects, Natura 2000 sites, protected structures, aircraft flight paths, or by reason of noise or visual impact. The concept of ‘special landscape character’ has not been defined in the County Development Plan.



The Planning Authority notes that wind farm applications may still be granted in accordance with planning and sustainable development for the area, however it is not clear how this could be achieved given the approach to placing weight on the Renewable Energy Strategy mapping constraints. As such the policy is overly restrictive, unclear and conflicts with supportive renewable energy policies.

4.3 The Development as Sustainable Development

Planning applications must be determined upon their individual merits with due consideration given to proper planning and sustainable development as well as State, Ministerial and Local policies and objectives. While many development proposals will encompass both positive and negative aspects that require consideration, the Irish Government has made it clear that weight should be placed on the need to support climate recovery through the planning system and related consent regimes. The National Planning Policy Framework (NPPF) sets out that sustainable development is pursued in a positive way except where this would compromise the key sustainable development principles: economic, social and environmental. The Proposed Development meets each of the three principles of sustainable development as demonstrated in Table 4-2.

Table 4-2: The Development as Sustainable Development

Sustainable Development Principle	Accordance by the Proposed Development
<p>Economic Role</p>	<p>In addition to the benefits of energy generation carbon savings, the Proposed Development will generate wider benefits including job creation and wider socioeconomic benefits.</p> <p>The overall capital investment associated with the Proposed Development is approximately €88 million euro. Additionally, there will be beneficial effects for both the local and international supply chain, contributing to wider renewable energy sector growth.</p> <p>It is considered that the construction phase will have a beneficial effect on the local economy and employment in the area through the creation of jobs, investment in local infrastructure and electrical systems, and a contribution of approximately €21 million in Waterford City & County Council rates over the project’s lifetime.</p> <p>A community fund calculated in accordance with the Renewable Electricity Support Scheme (RESS) Terms and Conditions will be put in place. This would be made available to the local community for the duration of the RESS (15 years). The average capacity factor of wind energy projects in Ireland is 28.3% (SEAI, 2019). Assuming this efficiency, and an estimated project capacity of 68 Mega Watts, a community benefit fund would amount to an average of €337,155 per annum. The actual fund will vary around this average from year to year, depending on each year’s wind conditions. Wind measurements at the Study Area suggest that the proposed Coumragappul project could be capable of achieving an above average capacity factor, and therefore a larger community fund.</p>
<p>Social Role</p>	<p>Onshore wind development is recognised as a key technology in the energy mix which will contribute to Ireland’s low carbon future as set out in the National Planning Framework (NPF). The Proposed Development would contribute to the renewable electricity and energy targets as set out in NPF and to longer term Government policy objectives and targets. The Coumragappul project would also produce enough renewable electricity to power over 40,137 average Irish homes (SEAI 2018).</p>



Sustainable Development Principle	Accordance by the Proposed Development
	<p>The Proposed Development will create an opportunity to further develop the local renewable energy industry knowledge and skills base.</p> <p>During the operation of the Proposed Development, the Developer will focus on the provision of funding for community projects. This will focus on not-for-profit community enterprises, with an emphasis on low-carbon initiatives, but also local clubs, societies and other initiatives that will aim to build upon and improve economic, environmental and social requirements of local residents. The Applicant will work with the local community to gain feedback on their priorities and deliver projects that will help to support a strong, vibrant and healthy community.</p> <p>The Proposed Development has fostered an ethos of presenting a well-designed and safe built environment for the local community.</p>
<p>Environmental Role</p>	<p>The proposed layout and design approach aims to function well, making effective use of land and add to the overall environmental quality of the area in the long term. The EIAR demonstrates that the Proposed Development fully respects the local character and identity of the environment while supporting adaptation to climate change and moving towards a low carbon economy.</p> <p>The Applicant is of the opinion that sustainability when measured against the National Planning Policy Framework is a sufficiently weighty material consideration to outweigh the conflict with the wind energy designation map included in the Waterford City and County Council Renewable Energy Strategy.</p>

The Political Declaration recently adopted at the United Nations Sustainable Development Summit in New York (September 2023) reaffirmed that “climate change is one of the greatest challenges of our time”. The Declaration included the following statement:

“We stress the urgency of enhancing ambition for climate action in the implementation of the UNFCCC and the Paris Agreement in relation to climate mitigation, adaptation and the provision of the means of implementation, especially finance to developing countries. We urge the implementation of the decisions adopted at COP 27 held in Sharm El-Sheikh. We will take concrete steps toward the operationalization of the new funding arrangements for responding to loss and damage by COP 28. We commit to continuing our work to accelerate our action to address climate change. In this regard, we also look forward to the first global stock take of the Paris Agreement to take place at COP 28”.

The current failings to rise up to the climate challenge are recognised and the need for urgent action has been embedded in the Political Declaration of the United Nations, of which Ireland is a member. The requirement to enhance the ambition for climate action is a significant material matter for consideration when considering the weight that should be attributed to the substantial climate resilience benefits of the Proposed Development in determining the consent application.



5. CONCLUSION

In accordance with The Planning and Development Act 2000, as amended, this Planning Statement has assessed the Proposed Development Application against the provisions of the Waterford City and County Development Plan, and relevant material considerations including the potential environmental effects, in the context of planning policy framework, particularly in relation to its strategic importance in relation to renewable energy and climate change.

The Proposed Development is in the national interest and is of strategic importance to Ireland. This Planning Statement outlines how the Proposed 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 County policy and whilst it finds that the Proposed Development is located within an Excluded Area in the Renewable Energy Strategy, the environmental and planning constraints that appear to give rise to this designation are not significant. Indeed the Proposed Development is in accordance with other conflicting policies that require the development to not have an adverse effect on residential and rural amenities, special landscape character, views or prospects, Natura 2000 sites, protected structures, aircraft flight paths, or by reason of noise or visual impact. 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.

The findings of the EIAR are tested against planning policy and it is found that the residual environmental effects will not undermine land use policy. It is recognised that the national and European policy position and targets established to address the climate emergency have shifted significantly since the development of the Local Authority Renewable Energy Strategy, and that consequently the Strategy can be considered to be somewhat out of date as it has not kept pace with the CAP23 objectives. Therefore it is encouraged that the presumption in favour of sustainable development is engaged when considering when considering acceptability of the Proposed Development.

It is respectfully requested, for the reasons outlined within this Planning Statement, that the Board should grant planning permission for the Proposed Development.



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