MWP

Planning Statement

Carrownagowan Grid Route

FuturEnergy Carrownagowan DAC

November 2023

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1. Introduction

Malachy Walsh and Partners on behalf of FuturEnergy Carrownagowan DAC (the 'Applicant') wish to apply to An Bord Pleanála for permission to construct a grid connection development from the consented Carrownagowan Wind Farm substation (ABP-308799-20) to the existing ESB owned 110kV substation at Ardnacrusha, County Clare (hereafter referred to as the 'Proposed Development'), under section 182A of the Planning and Development Act 2000 (as amended). FuturEnergy Ireland is a joint venture company owned by Coilte and the ESB which was launched in November 2021. For the purposes of this application, a dedicated company and a subsidiary of FuturEnergy Ireland in the name of FuturEnergy Carrownagowan DAC was established.

The Carrownagowan Wind Farm and substation were granted planning permission on the 29th of September 2022. The development will comprise of 19 wind turbines, an associated 110kV substation and all associated works. The Applicant is now seeking permission from An Bord Pleanála to develop an underground grid connection development to connect the consented Wind Farm to the National Grid.

MWP commenced pre-application consultations with An Bord Pleanála on the 20th of October 2022 (ABP- 314127-22). On the 4th April 2023 the board concluded the pre-application process and issued its opinion that the Proposed Development would be strategic infrastructure and that an application for approval should be made to them under 182A of the Planning and Development Act, as amended.

This report provides a concise overview of the planning merits of the Proposed Development. The purpose of this planning report is to provide details which will assist An Bord Pleanála in determining whether the Proposed Development is in accordance with the proper planning and sustainable development of the area, and accordingly whether planning permission should be granted for the Proposed Development. The report is set out as follows:

- Section 2: Application Site - This section provides a description of the site, its context, and the relevant planning history.
- Section 3- Planning History- This section sets out the relevant planning history.
- Section 4: Description of Proposed Development - This section describes the proposal.
- Section 5: Planning Policy Framework – This section outlines the national, regional and local planning policies relevant to the application site and Proposed Development.
- Section 6: Planning Assessment – This section provides an assessment of the principle of development and other relevant considerations.
- Section 7: Conclusion - This section summarises the key points set out in the report.

This report should be read in conjunction with the suite of information lodged to the Board which includes a comprehensive Environmental Impact Assessment Report (EIAR).

2. Application Site

The Carrownagowan substation is located within the townland of Caherhurly. The underground cable will be installed within the body of the public road network until it reaches the Ardncrusha substation as illustrated in Figure.1 below. The chosen connection cable is 25km in length and lies within the townlands of of Caherhurly, Killokennedy, Cloongaheen West, Cloongaheen East, Kilbane, Killeagy (Goonan), Ballymoloney, Cloonygonry Beg Ballyquin Beg, Ballyquin Mor, Springmount, Leitrim, Fahy More (South), Aharinaghmore, Ballybrack, Tooreen, Aharinaghbeg, Cloghera, Trough, Knockdonagh, Roo West, Lakyle, Glenlon South, Castlebank, Ballykeelaun, Co. Clare.

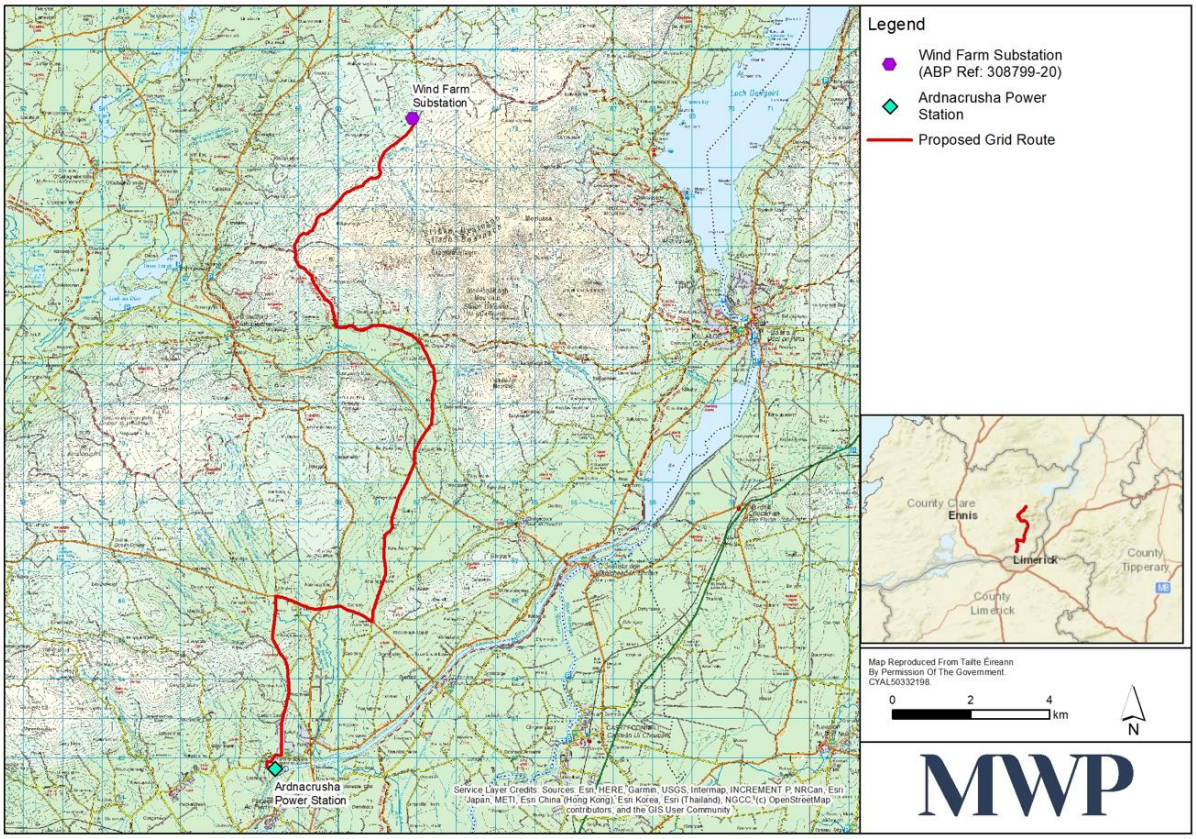

Figure 1: Proposed Grid Route

The layout of the Proposed Development has been designed to minimise the potential environmental effects, while selecting the shortest possible and most practical grid connection route. Chapter 4 of the Environmental Impact Assessment Report (EIAR) explores the alternative options for this grid connection and the rationale for the chosen route.

3. Planning History

The following planning applications are of relevance to the assessment of the proposal are outlined in Tables 1 & 2 below.

3.1 Carrownagowan Substation (Starting point)

Planning Ref.	Description	Location	Planning Authority Decision
ABP-308799-20	Coillte applied for planning permission for the development of 19 wind turbines, one meteorological mast, 110kV substation and all associated site development works	Townlands of Ballydonaghan, Caherhurley, Coumnagun, Carrownagowan, Inchalughoge, Killokennedy, Kilbane, Coolready and Drummod, Co. Clare.	Granted, Conditional 29/09/2022

Table 1: Planning History at Carrownagowan Wind Farm Site

3.2 Ardnacrusha Substation

Planning Ref.	Description	Location	Planning Authority Decision
072029	ESB applied for planning permission to erect a new 110kv single circuit cable end mast outside Ardnacrusha Sud Station compound, the mast will be 16.25m in height.	Ardnacrusha Sub-station, Ballykeelaun, Co. Clare	Granted, Conditional 22/10/2007
08102	Eirgrid applied for planning permission for development at the existing ESB Ardnacrusha 110kv Station. This development will consist of alterations to the existing 110KV Ardnacrusha Station to include the installation of a capacitor bank, associated surge arrestors and chainlink screening. Ancillary works will include alterations to the existing compound fence.	ballykeelaun and Castlebank, Ardnacrusha, Co.Clare	Granted, Conditional 20/04/2008
091235	Eirgrid applied for planning permission for alterations to the existing 110kV Ardnacrusha station to include the installation of one no. capacitor bank and associated surge arrestors, reactors, cable sealing ends, unbalance CT, safety screening, circuit breakers & safety screening; one 110kV MTS line bay and associated cable sealing ends, surge arresters & switchgear. Ancillary works will also include alterations to the existing compound chainlink fence and associated site works	Ardnacrusha Sub-station, Ballykeelaun, Co. Clare	Granted, Conditional 01/03/2010
12137	Eirgrid applied for planning permission for the development of electrical transmission infrastructure and associated works adjacent to the site of an existing 110 kV substation site within the Ardnacrusha Power Station complex. The Proposed Development comprises the following elements: Construction of a 110kV Gas Insulated Switchgear (GIS) substation building of 1808m2 area, and with an estimated maximum height of 12.5 metres over local ground level: Installation of associated Gas Insulated Switchgear within the substation: Associated relocation of an existing stores building, to a site adjacent to the proposed GIS substation: Associated transfer of circuits from the existing 110kV Air Insulated Switchgear(AIS) equipment to the new 110kV GIS substation: Associated decommissioning of existing 110kV equipment from the existing AIS substation: Associated removal and re-	Ballykeelaun, Castlebank, County Clare	Granted, Conditional 31/05/2012

Planning Ref.	Description	Location	Planning Authority Decision
	location of transmission towers at the site and : All associated site development works, including provision of 5 No. car parking spaces adjacent to the substation		
13349	Eirgrid applied for planning permission for development which will consist of modifications to previously approved development under Planning Permission No P12/137 at a site adjacent to the site of an existing 110 kV station within the Ardnacrusha Power Station complex.	Ballykeelaun, Castlebank, Co Clare	Granted, Conditional 30/09/2013
23148	For development of a wind farm in the townlands of Fahy Beg, Fahy More North, Ballymoloney, Ballyknavin (Ed O'Briensbridge), Balllyquin More, Woodpark and Leitrim, Co Clare together with the development of an underground grid connection cable to the National Grid. The underground grid connection is located primarily within the public road within the townlands of Leitrim, Fahy More South, Ballybrack, Aharinaghmore, Tooreen (Ed Cloghera) Aharinaghbeg, Knockdonagh, Roo East, Blackwater, Rosmadda West, Parkroe, Lackyle (Ed Ballyglass) and Castlebank, Co Clare. Temporary accommodation works to facilitate the delivery of wind turbine components to the site will be required in the townland of Ardataggle, Co Clare. The development will consist of: Construction of 8 no. wind turbines with a blade tip height range from 169m to 176.5m, a hub height range from 102.5m to 110m and a rotor diameter range from 131m to 138m; Erection of 1 no. permanent meteorological mast to a height of 100m above ground level; Construction of 1 no. onsite 38kV electrical substation to ESB Networks (ESBN) specifications and associated compound including Welfare facilities, Electrical infrastructure, Parking, Wastewater holding tank, Rainwater harvesting tank, Security fencing and all associated infrastructure, services and site works including landscaping in the townland of Woodpark; Installation of medium voltage electrical and communication cabling underground between the proposed turbines and the proposed on-site substation and associated ancillary works; Construction of turbine foundations and crane pad hardstanding area; Construction of new site tracks and associated drainage infrastructure; Upgrading of existing tracks and associated drainage infrastructure where necessary; Access to the proposed wind farm site will be from the R466 local road and will consist of the use of an existing quarry entrance in the townland of Leitrim which will be upgraded, as well as the creation of 1 no. new permanent site entrance on the Fahymore local road in the townland of Ballyquin More, and the use of 1 no. existing field entrance which will be upgraded, in the townland of Ballymoloney. The site entrances shall be used for both construction and operation of the proposed wind farm; All associated drainage and sediment control; Installation of new watercourse and drain crossings; Reuse and upgrading of existing internal watercourse and drain crossings; 2 no. temporary construction site compounds and associated ancillary infrastructure including parking; Tree felling to facilitate construction and operation of the Proposed Development; Installation of medium voltage (38kV) electrical cabling and communication cabling underground along the public road within the townlands of Leitrim, Fahy More South, Ballybrack, Aharinaghmore, Tooreen (Ed Cloghera), Aharinaghbeg, Knockdonagh, Roo East, Blackwater, Rosmadda West,	Fahy Beg, Fahy More North, Ballymoloney, Ballyknavin, (Ed O'Briensbridge), Ballyquin More, , Woodpark, Leitrim, Fahy More South, Ballybrack, Aharinaghmore, Tooreen , (Ed Cloghera), Aharinaghbeg, Knockdonagh, Roo East, Blackwater, Rosmadda West, Parkroe, Lackyle, (Ed Ballyglass) Castlebank and Ardataggle, Co. Clare	Refused 03/05/2023 Currently appealed to An Bord Pleanála ABP-317227-23

Planning Ref.	Description	Location	Planning Authority Decision
	Parkroe, Lackyle (Ed Ballyglass) and Castlebank between the proposed on-site substation within the townland of Woodpark and the existing Ardnacrusha substation within the townland of Castlebank, and associated ancillary works. The proposed grid connection cable works will include 4 no. watercourse crossings by horizontal directional drilling within the public road corridor in the townlands of Parkroe, Blackwater, Knockdonagh, Aharinaghbeg, Tooreen (Ed Cloghera), Fahy More South and Leitrim and the installation of 14 no. pre-cast joint bays and communication chambers; Temporary works at 2 no. sections of the R466 in the townland of Ardtaggle to facilitate the delivery of turbine components associated with the Turbine Delivery Route. The application is seeking a ten-year planning permission and 35 year operational life from the date of commissioning of the wind farm. An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) has been prepared in respect of the Proposed Development and will be submitted with the application		

Table 2: Planning History at Ardnacrusha Substation

4. The Proposed Development

The Proposed Development comprises a 25 km long 110kV underground cable connection from consented Carrownagowan Wind Farm substation to the existing ESB owned 110kV substation at Ardnacrusha, County Clare which will allow the electrical energy generated from the wind farm to be exported onto the national grid. The grid connection works will take approximately 6-8 months to complete. The Proposed Development will connect the permitted Carrownagowan Wind Farm to the grid via the existing ESB owned 110kV substation at Ardnacrusha, County Clare. The other elements of the overall windfarm project are considered in combination with the Proposed Development.

There are a total of nine (9) no. major watercourse crossings along the Proposed Development, eight (8) will be completed by means of Horizontal Directional Drill (HDD) which will require a service trench (launch pit) for the drill in the road either side of the watercourse; and one (1) of the watercourse crossings will be completed by means of over-bridge in road solution. There will be no interactions with any watercourse.

Joint bays are pre-cast concrete chambers which will be required along the grid connection route over its entire length. They are required to join cables together to form one continuous cable. They will be located at various points along the proposed development approximately every 700 - 850 metres (m) depending on gradients, bends etc. It is proposed to install 35 no. joint bays and communication chambers along the proposed development.

(See Chapter 2 of the attached EIAR for a more detailed description)

5. Policy & Legislation

5.1 International Policy

5.1.1 United Nations Framework Convention on Climate Change

In March 1994 the United Nations Framework Convention on Climate Change (UNFCCC) came into force, with the ultimate aim of combatting the challenge posed as a result of climate change.

The UN Framework Convention on Climate Change (UNFCCC) sets out the basic legal framework and principles for international climate change cooperation with the aim of stabilizing atmospheric concentrations of greenhouse gases (GHGs) to avoid "dangerous anthropogenic interference with the climate system". This framework was established in 1992 and came into force in March 1994. The framework set no binding limits on greenhouse gases from individual countries and contains no enforcement mechanisms. Instead, to set these binding limits and to boost the effectiveness of the framework specific treaties (called "protocols" or "Agreements") were introduced.

5.1.2 Kyoto Protocol

The Kyoto Protocol was adopted on 11 December 1997. Owing to a complex ratification process, it entered into force on 16 February 2005. The Protocol operationalizes the UNFCC by committing industrialized countries and economies in transition to limit and reduce greenhouse gases (GHG) emissions in accordance with agreed individual targets. The first commitment period under the Kyoto Protocol was over the five-year period 2008–2012.

In Doha, Qatar, on 8th December 2012, the Doha Amendment to the Kyoto Protocol was adopted. The Amendment introduced a second commitment period from 2013 to 2020 and a revised list of GHGs to be reported on by Parties.

5.1.3 COP21 Paris Agreement

The Paris Agreement evolved from the historic United Nations Framework Convention on Climate Change in Kyoto where participants agreed to limit total greenhouse gas emissions to a defined percentage below their 1990 levels. COP21 was the 21st session of the Conference of the parties (COP) to the UNFCCC. The Paris agreement is a legally binding international treaty on climate change. It was adopted by 196 parties at COP21 in Paris, on the 12th of December 2015 and entered into force on the 4th of November 2016. The main aim of this plan is to limit global warming to well below 2, preferably to 1.5 degrees Celsius, compared to pre-industrial levels. It is flexible and takes into account the needs and capacities of each country.

An article published by the IPCC on the 6th of October 2018 titled 'Global Warming of 1.5°C', notes the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways; in the context of mitigation pathways, strengthening of the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty. The Report responds to the invitation for IPCC '… to provide a Special Report in 2018 on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways' contained in the Decision of the 21st Conference of Parties of the United Nations Framework Convention on Climate Change to adopt the Paris Agreement and provides an update on the impact of climate change if emissions are not reduced.

5.1.4 COP26 Glasgow

The 26th session of the conference of parties was held in Glasgow between the 31st October and 13th November 2021. It found that cuts in global greenhouse gas emissions are still far from where they need to be to preserve a liveable climate, and support for the most vulnerable countries affected by the impacts of climate change is still falling far short. It highlighted that in principle the Paris Agreement is working, and the session produced new "building blocks" to advance implementation of the Agreement through actions that can get the world on a more sustainable, low-carbon pathway forward. Some of the key points agreed in the session include:

- Countries reaffirmed the Paris Agreement goal of limiting the increase in the global average temperature to well below 2°C above pre-industrial levels and pursuing efforts to limit it to 1.5°C;
- Commitment to 'phase-down' coal-fired energy generation;
- Countries pledged to increase funding to developing countries to assist with emission reductions and the ability to cope with the effects of climate change; specifically, agreement was reached to double the proportion of climate finance going to climate adaptation measures;
- Countries reached agreement on the remaining issues of the so-called Paris rulebook, the operational details for the practical implementation of the Paris Agreement.

5.1.5 COP27 Egypt

The 27th conference of the parties of the UNFCC was held from 6 November until 20 November 2022 in Sharm El Sheikh, Egypt. The key outcome was agreement on a creation of loss and damage funding for vulnerable countries hit hard by climate disasters.

5.1.6 EU Renewable Energy Directive 2009/28/EC

In June 2009, the European Commission published EU Directive 2009/28/EC (the 'Renewable Energy Directive') on the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC on the promotion of electricity produced from renewable energy sources in the internal electricity market.

The ambition and measures in the directive have been reviewed several times in order to deliver the urgent emission cuts (at least 55% by 2030) that are required to achieve the EU's increased climate ambitions. In July 2021, the Commission proposed a revision of the directive (COM/2021/557 final) with an increased 40% target as part of the package to deliver on the European Green Deal. In May 2022, the Commission proposed in its Communication on the REPowerEU plan (COM/2022/230 final) to further increase this target to 45% by 2030.

5.1.7 REPower EU

In May 2022, the European Commission published its 'REPowerEU' plan outlining the EU's path to energy independence from Russian fossil fuels by 2027. The plan outlines short-, medium- and long-term measures covering the following three pillars:

- Demand reduction;
- Diversification of suppliers for conventional (fossil) fuel imports whilst future–proofing the corresponding infrastructure; and

- Acceleration of the transition to renewable energy sources.

The plan aims to increase the European Renewable energy target to 45% by 2030, up from 40%, and to recognise renewable energy as an overriding public interest in the 'Renewable Energy Directive'.

5.2 National Policy

5.2.1 National Planning Framework

National Planning Framework (NPF) sets the vision and strategy for the development of the country to 2040. It recognises the need to move toward a low carbon and climate resilient society as set out in NSO 8 (Transition to Sustainable Energy). It is an action of the NPF under NSO no. 8 to "reinforce the distribution and transmission network to facilitate planned growth and distribution of a more renewables focused source of energy across the major demand centres"

The plan also promotes renewable energy uses and generation in appropriate locations (NPO 55) and emphasises that rural areas have a strong role to play in securing a sustainable renewable energy supply (NPO 23). It seeks to harness the country's renewable energy potential, achieve a transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050, and promote new energy systems and transmission grids.

5.2.2 National Development Plan 2021-2030

As part of Project Ireland 2040 the National Development Plan sets out the Government's over-arching investment strategy and budget for the period 2021-2030. Chapter 13, NSO 8 focuses on the need to transition to a Climate-Neutral and Climate-Resilient Society. The plan highlights the need for 80% of Ireland's electricity to be produced from a combination of onshore and offshore renewable sources by 2030, in order to reduce the countries emissions. In order for this to be achieved, it will require a coordinated programme of investment in

- Grid-scale renewable electricity generation and storage;
- An expanded and strengthened electricity transmission and distribution network;
- Conventional electricity generation capacity to support the operation of the electricity system
- Provide security of supply for when variable generation (wind/solar) is not sufficient to meet demand

5.2.3 National Mitigation Plan 2017

It represents an initial step to set Ireland on a pathway to achieve the deep decarbonisation in line with Government policy objectives by mid-century, recognising that climate change is a key challenge. It includes a range of mitigation measures and actions to decarbonise the electricity generation sector and to prepare for the EU renewable energy targets that Ireland will take on for 2030. The plan recognises the importance of facilitating the integration of renewable energy on to the grid and how it can aid in accelerating the low carbon transmission.

5.2.4 Ireland's Transition to a low carbon Energy Future 2015- 2030

The White paper on Energy policy published by the Department of Communications, Energy and Natural Resources in December 2015 sets out a vision to reduce greenhouse gas (GHG) emissions by 80% and 90% compared to 1990 levels by 2050, falling to zero or below by 2100. It states that as new energy solutions such as bioenergy, solar photovoltaic and offshore wind mature and become more cost effective and will be included in the renewable energy mix. The policy document recognises that Ireland has great potential to increase energy security in meeting renewable energy targets.

5.2.5 Climate Action Plan 2023

The Climate Action Plan 2023 (CAP23) is the second annual update to Ireland's Climate Action Plan 2019. This plan is the first to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021, and following the introduction, in 2022, of economy-wide carbon budgets and sectoral emissions ceilings.

The plan implements the carbon budgets and sectoral emissions ceilings and sets out a roadmap for taking decisive action to halve our emissions by 2030 and reach net zero no later than 2050, as committed to in the Programme for Government. One of the most important measures in the plan is to increase the proportion of renewable electricity to up to 80% by 2030. In order for this to be achieved the plan recognises the need to develop the onshore grid to support renewable energy targets.

Section '12.1.4 Measures to meet the Challenge' notes that measures to accelerate renewable energy generation include delivery of a streamlined electricity generation grid connection policy and process. It is also stated that, '*In line with the emerging EU frameworks, ensure that renewable energy generation projects, and associated infrastructure, will be considered to be in the overriding public interest*.'

5.2.6 Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure, July 2012

In this Policy statement the Government acknowledge the essential need to meet the demand for energy in a safe, secure and continuous manner. It reaffirms the imperative need for development and renewal of the energy networks, in order to meet both economic and social policy goals. The Government endorses, supports and promotes the strategic programmes of the energy infrastructure providers, particularly EirGrid's Grid 25 investment programme across the regions. The benefits are identified as securing electricity supply to homes, businesses, factories and farms; underpinning sustainable economic growth in the regions and enabling Ireland to meet its renewable energy targets.

5.2.7 Ireland's Grid Development Strategy 2017

This provides a strategic overview for the development of the electricity transmission system. It confirmed the need for investment in the electricity transmission system. All practical technology solutions will be considered with a strategy of optimising the existing grid so as to minimise grid infrastructure.

5.3 Regional Policy

5.3.1 Regional Spatial and Economic Strategy – Southern Regional Assembly

The Southern Regional Assembly is responsible for the preparation and implementation of a Regional Spatial and Economic Strategy (RSES) for the Southern Region. The RSES for the Southern Region came into effect on 31st January 2020 and the primary aim of the RSES is to implement Project Ireland 2040 - the National Planning Framework. Furthermore, the Southern Regional Assembly supports the implementation of the Irish Government's Climate Action Plan.

The RSES recognises and supports the many opportunities for onshore wind as a major source of renewable energy. The RSES sets out the following Regional Policy Objectives (RPO's) on renewable energy:

- RPO 87 - Low Carbon Energy Future The RSES is committed to the implementation of the Government's policy under Ireland's Transition to a Low Carbon Energy Future 2015-30 and Climate Action Plan 2019. It is an objective to promote change across business, public and residential sectors to achieve reduced GHG emissions in accordance with current and future national targets, improve energy efficiency and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture.

- RPO 99 Renewable Wind Energy It is an objective to support the sustainable development of renewable wind energy (on shore and off shore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.

- RPO 219 - New Energy Infrastructure It is an objective to support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers (subject to appropriate environmental assessment and the planning process) to ensure the energy needs of future population and economic expansion within designated growth areas and across the Region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs.

- RPO 221 - Renewable Energy Generation and Transmission Network

  a. Local Authority City and County Development Plans shall support the sustainable development of renewable energy generation and demand centres such as data centres which can be serviced with a renewable energy source (subject to appropriate environmental assessment and the planning process) to spatially suitable locations to ensure efficient use of the existing transmission network;

  b. The RSES supports strengthened and sustainable local/community renewable energy networks, micro renewable generation, climate smart countryside projects and connections from such initiatives to the grid. The potential for sustainable local/community energy projects and micro generation to both mitigate climate change and to reduce fuel poverty is also supported;

  c. The RSES supports the Southern Region as a Carbon Neutral Energy Region.

5.4 Local Policy

5.4.1 Clare County Development Plan 2023-2029

The Clare County Development Plan 2023-2029 was adopted on the 20th of April 2023 and sets the overall strategy for the planning and sustainable development within the administration boundaries for County Clare. The plan recognises the need to reduce the carbon footprint by integrating climate action into the planning system in support of national targets, support indigenous renewable sources in order to reduce dependence on fossil fuels and improve security of supply and the move to a competitive low carbon economy. The plan aims to facilitate measures which will accelerate the transition to a low carbon society as set out in CDP2.14

The Council aim to support and facilitate the upgrading of the grid as set out in CDP 11.44:

"To promote and facilitate the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure, to integrate renewable energy sources, thereby creating a secure and efficient energy supply and storage system for County Clare which is ready to meet increased demand as the regional economy grows"

A strong transmission grid is essential to attract and retain high-tech industrial investment, to ensure competitive energy supplies, to achieve balanced development, to reduce dependency on fossil fuels and to achieve climate change targets. Moreover, to attract renewable energy development it is important for County Clare that the existing grid infrastructure is reinforced where necessary and expanded to areas not adequately serviced.

It is an objective for the council to:

CDP11.47-

a) *To encourage and to favourably consider proposals for renewable energy developments, including community owned developments, and ancillary facilities in order to meet National, Regional and County renewable energy targets, and to facilitate a reduction in CO2 emissions and the promotion of a low carbon economy;*

c) *To support the sustainable development of renewable wind energy (on-shore and offshore) at appropriate locations and of its related grid infrastructure in County Clare, in accordance with all relevant policies, guidance and guidelines pertaining to the protection of the environment and protected habitats and species, and to assess proposals having regard to the Clare Wind Energy Strategy in Volume 6 of this plan and the associated SEA and AA, or any subsequent updated adopted Strategy and to national Wind Energy Guidelines;*

The Clare Wind Energy Strategy (WES) constitutes Volume 6 of the County Development Plan. A key priority was to identify sites of strategic regional and national importance which have the potential to accommodate wind energy development. The WES identifies the optimum locations for wind energy developments in the county having regard to environmental and geographical constraints and the protection of the amenities of local residents.

The wind farm itself, the start of the grid route is situated in an area designated as 'Strategic Area' which are areas that are considered to be eminently suitable for wind farm development for a number of factors such as viable wind speeds, proximity to the grid, distances from properties and outside any Natura 2000 site. The remainder of the grid route traverses an area designated as "Acceptable in Principle" and mainly encompasses land designated as 'Open to Consideration' to wind energy developments. The proposed Grid Connection and related works are enabling works for the already permitted windfarm development and should not therefore be considered new wind energy development for the purposes of assessing suitability within this area.

6. Assessment

6.1 Principle of Development

The principle of development for a wind farm and support infrastructure is well established in the area, having regard to consented Carrownagowan Wind Farm development. The basis for this proposed grid connection application arises from the need to connect the Carrownagowan Wind Farm to the National Grid, thereby according with the aims and objectives of the Development Plan. Renewable energy projects are supported in principle at National, Regional and Local policy levels, with the need to reduce greenhouse gas emissions, reduce resilience on fossil fuels and combat climate change.

The Climate Action Plan 2023 sets out a roadmap for taking decisive action to halve our emissions by 2030 and reach net zero no later than 2050. One of the most important measures in the plan is to increase the proportion of renewable electricity to up to 80% by 2030. It is recognised that this will require very substantial new infrastructure including wind and solar farms, grid reinforcement, storage development and interconnection. The Proposed Development will facilitate the construction of the consented Carrownagowan Wind Farm, and when the wind farm is operational, renewable energy will be exported to the National Grid via the proposed grid connection.

Transitioning to a low carbon and climate resilient society is a National Strategic Outcome of the National Planning Framework. Reflecting this, National Policy Objective 55 will seek to "promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050." It is therefore recognised that the transition to a low carbon energy future requires a shift from predominately fossil fuels to predominately renewable energy sources.

The works involved in relation to the proposed grid route are considered relatively minor in the context of that already permitted. At local level, the recently adopted County Development Plan 2023, is supportive of facilitating sustainable energy infrastructure (CDP 11.44) and renewable energy developments (CDP 11.47) and recognises the importance of these developments in meeting national renewable energy targets.

Overall, the proposed Grid Connection development and associated work is in compliance with the strategic objectives of the National, Regional and Local policy on renewable energy.

6.2 Biodiversity

A Screening for Appropriate Assessment Report prepared by the ecology team at MWP and is submitted with this planning application. There are a number of designations within 15Km of the Proposed Development site. The Proposed Development will not directly affect the qualifying interests of either Glenomra Wood SAC or Slieve Bernagh Bog SAC as the grid route is not located within the habitats listed as qualifying interests. It is submitted that it can be excluded, on the basis of objective information, that the Proposed Development, individually or in combination with other plans or projects, will not have a significant effect on any European sites.

It was concluded in the Chapter 6 of the EIAR that effects on biodiversity after mitigation, including effects on designated sites, habitats, flora, fauna and water quality are not considered significant provided mitigations and

best practice methodologies are employed during the construction phase. The application of construction phase mitigation and protection measures will ensure that no significant residual ecological impacts either alone or in combination with other plans or projects will arise from the project.

6.3 Traffic

An impact on traffic is likely during the construction of the Proposed Development and so a Traffic Management Plan (TMP) has been prepared as part of this application. This TMP outlines the procedures to be implemented during the construction of the development with the intent to maximise the safety of the workforce and travelling public, and to keep traffic flowing as freely as possible keeping the impact on traffic to a minimum. It is envisaged that a system of single lane and road closures will be implemented along the underground grid connection route in the public roadway. This is to ensure the cable route can be constructed safely to protect construction workers and members of the public. Roads closures will be implemented where there is insufficient space on the existing public roadway to implement a single lane closure and diversions will be in place to provide an alternative route.

6.4 Archaeology & Cultural Heritage

An Assessment was undertaken by Faith Bailey and Jacqui Anderson of IAC Archaeology and in dept details of this are set out in Chapter 10 Cultural Heritage of the EIAR. In summery Within the footprint of the Proposed Development there are no known features of archaeological importance. There is one Protected Structure, BH 1 Kilbane Bridge, located along the route of the Proposed Development. However, this structure will be avoided as the cable will be laid beneath the adjacent stream bed (minimum dept of 1.5m).

No cultural heritage assets will be directly impacted by the construction of the Proposed Development. Construction of the Proposed Development will have a direct impact on one designed landscape, that at Ballyquin House (DL 3). However, as the Proposed Development traverses an existing road, which already extends through this area, therefore the impact is minimal.

Previously unknown archaeological sites and features may survive below ground across the Proposed Development site, particularly within the zones of notification for recorded monuments AH03, AH07, AH10, AH11, AH12 and AH14. Where the Proposed Development passes through these zones excavation will be subject to monitoring by a suitably qualified archaeologist.

Once the development is operation it is predicted that there will be no impacts to the archaeological, architectural and cultural heritage resource and as such no mitigation measures are required.

6.5 Residential Amenity

There are a number of residential developments in close proximity to the proposed Grid Connection Route. The majority of the Proposed Development will be located within the curtilage of existing roads within an excavated trench, therefore the potential for significant impact is very low. There will be no impacts during the operation phase of the development however, during the construction phase there may be concerns with regard to traffic, noise and dust disturbance. These potential issues are assessment in the EIAR where it is concluded that these impacts would be minor and for a short time frame. Noise and Dust management plans are outlined in the Construction Environmental Management Plan (CEMP).

7. Conclusion

This report sought to highlight the relevant policies in the context of the proposed underground grid connection development. The Proposed Development is essential in connecting the consented Carrownagowan Wind Farm to the National Grid. Given that the Proposed Development is underground it is considered that there will be little to no effects on the surrounding environment and landscape once operational.

The development design has been informed by consultation with the public and relevant bodies. The environmental studies and assessments completed demonstrate the project would not create an unacceptable impact on the environment, archaeological features and residential amenity.

The Proposed Development is therefore in accordance with the proper planning and sustainable development of the area and will contribute towards achieving National and EU targets. There are policies supporting renewable energy grid infrastructure at National, Regional and Local Level and it will also contribute towards Clare County Council's goal of becoming a leader of renewable energy provision.