2. BACKGROUND TO THE PROPOSED DEVELOPMENT

This section of the Environmental Impact Assessment Report (EIAR) presents information on renewable energy and climate change policy and targets, the strategic, regional and local planning context for the Proposed Project (with the primary focus of this chapter being the Proposed Wind Farm, subject of this planning application), planning history, scoping and consultation, as well as setting out the nature of the cumulative impact assessment process undertaken.

2.1 Introduction

The Proposed Wind Farm comprises the provision of a wind farm of 9 no. wind turbines with a tip height of 185 metres (m) and an estimated installed generating capacity of 63MW including associated infrastructure located in the townlands of Borrisbeg and adjacent townlands, near Templemore town in Co. Tipperary. For ease, and as set out in Chapter 1 of the EIAR:

- The '**Proposed Wind Farm'** refers to the 9 no. turbines and supporting infrastructure which is the subject of this Section 37E application.
- The '**Proposed Grid Connection'** refers to the 110kV substation and supporting infrastructure which will be the subject of a separate Section 182A application.
- The '**Proposed Project'** comprises the Proposed Wind Farm and the Proposed Grid Connection, all of which are located within the EIAR Study Boundary (the '**Site**') and assessed together within this EIAR.

The provision of wind turbines will generate renewable energy and provide it for use on the national grid. The need to decarbonise and reduce emissions has always been imperative, however, in recent years the urgency involved has become clearer to all stakeholders. The Climate Action Plan (CAP) published by the Government in 2023 sets out a roadmap to halve emissions by 2030 and reach net zero no later than 2050. Central to this is the set of measures set out to increase the proportion of renewable electricity to up to 80% by 2030 and a target of 9GW from onshore wind. The CAP places front and centre the facts that without urgent action, global warming is likely to be more than 2˚C above pre-industrial levels, threatening the health and livelihoods of people across the globe. Urgency of action is also a key focus of the CAP.

Furthermore, the Programme for Government released in June 2020 also highlights that "*the reliable supply of safe, secure and clean energy is essential in order to deliver a phase-out of fossil fuels. We need to facilitate the increased electrification of heat and transport. This will create rapid growth in demand for electricity which must be planned and delivered in a cost-effective way.*"

The primary driver behind the Proposed Project is the need to provide additional renewable energy to offset the use of fossil fuels within the electricity generating sector. Increasing electricity generation from wind power represents the most economical renewable option to reduce emissions within the power generation sector and is the most mature technology available to achieve national targets that have been established for decarbonisation. The current proposal represents the provision of a significant wind energy proposal (as acknowledged by its classification as a Strategic Infrastructure Development under the Planning and Development Act, 2000 (as amended) and will contribute considerably towards Ireland satisfying its 2030 and 2050 renewable energy targets.

Figure 2-1 Application Site Boundary

2.1.1 Renewable Energy Resources

Renewable energy resources are constantly replenished through the cycles of nature, unlike fossil fuels, which are finite resources that are becoming increasingly scarce and expensive to extract.

Renewable energy resources offer sustainable alternatives to our dependency on fossil fuels as well as a means of reducing greenhouse gas emissions and opportunities to reduce our reliance on imported fuels. These resources are abundantly available in Ireland, yet only a fraction has been tapped so far[1].

A gradual shift towards increasing our use of renewable energy is no longer viable. There is an urgency now to ensure real changes happens. Renewable energy development is recognised as a vital component of Ireland's strategy to tackle the challenges of combating climate change and ensuring a secure supply of energy. Ireland is heavily dependent on the importation of fossil fuels to meet its energy need. 70% of energy used in Ireland is imported from abroad, higher than the EU average of almost 60% (National Energy Security Framework 2022). This high dependency on energy imports is highly risky and Ireland is currently extremely vulnerable both in terms of meeting future energy needs and ensuring price stability. As such, expanding indigenous renewable energy supply is critical for energy security and price stability.

2.2 Climate Change Policy and Targets

International and national policy consistently identifies the need to reduce greenhouse gas (GHG) emissions and stresses the importance of reducing global warming. The context of international policy has altered over the last 30-years from being of a warning nature to the current, almost universally accepted belief, that there is a climate change emergency occurring both within Ireland and at a broader global scale. The Intergovernmental Panel on Climate Change (IPCC)'s Sixth Assessment Report[2] published in 2021 provides a stark assessment of global climate change and presents evidence that climate changes will increase in all regions of the globe over the coming decades and that much of the damage caused by climate change up to this point is now likely irreversible, such as the rise in sea levels over the 21st century. The Climate Status Report for Ireland 2020[3] similarly reflects on clear and distinct impacts arising from climate change effects within an Irish context:

- An increase in the number of warm spell days over the last 60 years with very little change in cold spell duration;
- Annual precipitation was 6% higher in the period 1989–2018, compared with the 30-year period 1961–1990, and the decade 2006–2015 has been the wettest on record;
- Satellite observations indicate that the sea level around Ireland has risen by approximately 2–3mm per year since the early 1990s; and
- In 2018, carbon dioxide emissions were almost 18% higher than in 1990, primarily due to increased fossil fuel combustion in transport and energy industries.

The IPCC's Sixth Assessment Report does not, however, conclude that a climate catastrophe is inevitable, but rather, there remains a 'narrow path' to determine the future course of climate, mainly by cutting emissions down to net zero. The Proposed Project will contribute to the decarbonisation of the energy sector and reduce harmful emissions. In this regard, it is in compliance with national and international climate change policy and targets.

[1] *Source: Sustainable Energy Authority of Ireland (SEAI) website, www.seai.ie*
[2] *Climate Change 2021 'The Physical Science Basis' (Intergovernmental Panel on Climate Change, August 2021)*
[3] *Climate Status Report for Ireland 2020 (Environmental Protection Agency, Marine Institute, Met Éireann, August 2021)*

2.2.1 International Policy and Targets

United Nations Framework Convention on Climate Change

In 1992, Ireland joined an international treaty, the United Nations Framework Convention on Climate Change (UNFCCC), as a framework for international efforts to combat the challenge posed by climate change. The UNFCCC seeks to limit average global temperature increases and the resulting climate change. In addition, the UNFCCC seeks to cope with impacts that are already inevitable. It recognises that the climate system is a shared resource whose stability can be affected by industrial and other emissions of carbon dioxide and other greenhouse gases. The framework set no binding limits on greenhouse gas emissions for individual countries and contains no enforcement mechanisms. Instead, the framework outlines how specific international treaties (called "protocols" or "Agreements") may be negotiated to set binding limits on greenhouse gases.

Kyoto Protocol

The Kyoto Protocol operationalises the UNFCCC by committing industrialised countries and economies in transition to limit and reduce GHG emissions in accordance with agreed individual targets. Ireland is a Party to the Kyoto Protocol, which came into effect in 2005, and as a result of which, emission reduction targets agreed by developed countries are now binding.
In Doha, Qatar, on 8th December 2012, the "Doha Amendment to the Kyoto Protocol" was adopted. The amendment includes:

- New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from 1st January 2013 to 31st December 2020;
- A revised list of greenhouse gases (GHG) to be reported on by Parties in the second commitment period; and
- Amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period.

Under the protocol, countries must meet their targets primarily through national measures, although market-based mechanisms (such as international emissions trading) can also be utilised.

COP21 Paris Agreement

COP21 was the 21st session of the Conference of the Parties (COP) to the UNFCCC. Every year since 1995 (excluding 2020 due to COVID-19), the COP has gathered the 196 Parties (195 countries and the European Union) that have ratified the Convention in a different country, to evaluate its implementation and negotiate new commitments. COP21 was organised by the United Nations and held, in Paris, from 30th November to 12th December 2015. COP21 closed with the adoption of the first international climate agreement (concluded by 195 countries and applicable to all). The 12-page text, made up of a preamble and 29 articles, provides for a limitation of the global average temperature rise to well below 2°C above pre-industrial levels and to limit the increase to 1.5°C. It is flexible and takes into account the needs and capacities of each country. The IPCC's 6th Assessment Report (2021) further collaborates this need to limit any increase in global average temperature to 1.5oC, stating that (underlined for emphasis),

> *"Humanity has emitted 2,560 billion equivalent tons of CO_2 since 1750, and we only have a budget of 500 more if we want to limit warming to 1.5°C.*
>
> *By following a trajectory of very low GHG emissions (SSP1-1.9), the threshold of 1.5°C will be reached in the short term, between 2021 and 2040, before being very slightly exceeded (1.6°C anticipated over the period 2041-2060) then respected in the long term (1.4°C anticipated over the period 2081-2100).*

Everything is not lost, but we must pursue the Paris Agreement's most ambitious goal of limiting warming to 1.5°C."

An article published by the IPCC on the 6th October 2018 titled 'Global Warming of 1.5oC', 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. This special report is part of an invitation 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.

COP27 Egypt

COP27 took place in Sharm el-Sheikh from the 6th of November 2022 to the 20th of November. The Conference of the Parties (COP) is a supreme decision-making body of the United Nations Framework Convention on Climate Change (UNFCCC). COP 27 centred around three major topics:

- Closing the emissions gap to keep 1.5°C alive.
- Loss and Damage.
- Climate Finance.

COP 27 officially ended on the 18th of November, but due to the nature of negotiations an outcome text and the final press conference was not held until November 20th. The first outcomes of the negotiations of the COP 27 agenda were seen in the first draft document. A consolidated final document followed and while it removed much of the vague wording of the draft, it also removed some critical key points, particularly in relation to the strengthening of actions required by developed nations. The most significant outcomes from COP 27 are outlined below:

- **Phase down/out language:** In Glasgow last year, the final agreement was delayed due to the stance if China and India, among others, who were not comfortable the 'phase out' of coal wording in the draft text. This led to the watering down of this commitment to a 'phase down' of coal use. The hope was that COP27 would work to include further language on coal and fossil fuel reduction efforts. However, the wider commitment to phase out all fossil fuels, led by India, and backed by the US and the EU, was taken out and can be marked as the biggest disappointment of COP27.
- **1.5°C Pathway:** The 1.5°C warming limit has been retained and reassurances have been made that there is no room for backsliding. It gives the key political signals that the phase down of all fossil fuels is happening. There has been the setting of a workplan for 2023 to help articulate the nature and components of a global collective goal on adaptation and resilience and how it can be formatted in a way to take into account the Global Stocktake.
- **Climate Finance & Loss and Damage:** There has been the launch of an initiative by the V20 and G7 known as the Global Shield Against Climate Risk (GSACR). The intention of this initiative has been framed almost as an insurance policy backed by the World Bank to prepare and protect those most vulnerable to climate change disasters. The initiative seeks to reform the current climate finance model currently operating in the form of loans, typically with high interest rates and repayment requirements. The beginnings of a framework to compensate for the unequal distribution of harm that has been caused by climate change and the unequal contributions of emissions has also been put in place.

European Green Deal – European Climate Law (2021)

The European Green Deal, initially introduced by the European Commission in December 2019, sets out the 'blueprint' for a transformational change of the 27-country bloc from a high- to a low-carbon economy, without reducing prosperity and while improving people's quality of life, through cleaner air and water, better health and a thriving natural world. The Green Deal is intended to work through a

framework of regulation and legislation setting clear overarching targets, e.**g. a bloc-wide goal of net zero carbon emissions by 2050 and a 55% cut in emissions by 2030 (compared with 1990 levels).** This is a substantial increase compared to the existing target, upwards from the previous target of at least 40% (2030 Climate & Energy Framework), and furthermore, these targets demonstrate the ambition necessary to keep the global temperature increase to well below 2°C and pursue efforts to keep it to 1.5°C as per the Paris Agreement. With regard to the energy sector, the Green Deal focuses on 3 no. key principles for the clean energy transition, which will help reduce greenhouse gas emissions and enhance the quality of life for citizens:

- Ensuring a secure and affordable EU energy supply;
- Developing a fully integrated, interconnected and digitalised EU energy market; and
- Prioritising energy efficiency, improving the energy performance of our buildings and developing a power sector based largely on renewable sources (e.g. the subject development)

The European Climate Law[3] writes into law the objectives set out above in the European Green Deal for Europe's economy and society to become climate-neutral by 2050. Climate neutrality by 2050 means achieving net zero greenhouse gas emissions for EU countries as a whole, mainly by cutting emissions, investing in green technologies and protecting the natural environment. The Climate Law includes:

- A legal objective for the Union to reach climate neutrality by 2050;
- An ambitious 2030 climate target of at least 55% reduction of net emissions of greenhouse gases as compared to 1990, with clarity on the contribution of emission reductions and removals;
- A process for setting a 2040 climate target, taking into account an indicative greenhouse gas budget for 2030-2050 to be published by the Commission;
- A commitment to negative emissions after 2050;
- The establishment of European Scientific Advisory Board on Climate Change, that will provide independent scientific advice;
- Stronger provisions on adaptation to climate change; and
- Strong coherence across Union policies with the climate neutrality objective

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. All 27 no. EU Member States have committed to turning the EU into the first climate neutral continent by 2050. One third of the 1.8 trillion-euro investments from the NextGenerationEU Recovery Plan, and the EU's seven-year budget, will finance the European Green Deal. On 14th July 2021, the European Commission adopted a set of proposals to make the EU's climate, energy, transport and taxation policies fit for reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels. Achieving these emission reductions in the next decade which is crucial to Europe becoming the world's first climate-neutral continent by 2050 would clearly be assisted by the Proposed Project.

2.2.2 National Climate Policy

Report of the Joint Committee on Climate Action - Climate Change: A Cross-Party Consensus for Action (2019)

In March 2019, the Joint Committee on Climate Action Change released a report detailing a cross party consensus for action. The report in its introduction states that *"Irelands performance in meeting international obligations has to date been poor"* (refer to *'Emissions Projections for Ireland'* below). The Report highlights on-going concern regarding emission projections and growing evidence that Ireland is off track in meeting its 2030 targets under the relevant the EU Directives.

The report states that the transformation of Ireland's energy system will be required for the country to meet its future 2030 and 2050 GHG emission targets; specifically, in order to reach net zero emissions by 2050, Ireland will be required to fully decarbonise electricity generation. Therefore, there is a clear incentive for developing, and safeguarding, Ireland's capacity in renewable energies and renewable

electricity. Since this report was published, the Climate Action and Low Carbon Development (Amendment) Act 2021 has been enacted and there have been recent progress / future scenario assessments (e.g. EirGrid's '*All Island Generation Capacity Statement 2021 – 2030'* (September 2021)).

Given the clear concern that the county's future emissions targets may be missed, it is crucial that projects such as the Proposed Project which can contribute in a meaningful manner towards climate change targets and which can be provided without significant adverse environmental effects arising are brought forward and supported with favourable consideration through the planning system and constructed.

Programme for Government – Our Shared Future (April 2021)

The Programme for Government- Our Shared Future (updated in April 2021) places specific emphasis on climate change, stating that the next ten years are a critical period in addressing the climate crisis, and therefore, a deliberate and swift approach to reducing more than half of Ireland's carbon emissions over the course of the decade (2020-2030) must be implemented. The programme states that the government are committed to reducing greenhouse gas emissions by an average 7% per annum over the next decade in a push to achieve a net zero emissions by the year 2050.

With regard to energy generation, the Programme notes that the government is committed to the rapid decarbonisation of the energy sector. The Programme states the government's ongoing support and commitment to take "*the necessary action to deliver at least 70% renewable electricity by 2030."* While it is noted this has been updated by the 2021 Climate Action Plan, the Programme for Government sets out a range of measures to achieve this target which remain relevant, including:

- Finalise and publish the Wind Energy Guidelines;
- Continue Eirgrid's programme 'Delivering a Secure, Sustainable Electricity System';
- Strengthen the policy framework to incentivise electricity storage and interconnection;
- Produce a whole-of-government plan setting out how we will deliver at least 70% renewable electricity by 2030.

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

The Climate Action and Low Carbon Development (Amendment) Act 2021, which was signed into law on the 23rd July 2021, legally binds Ireland to achieve net-Zero emissions no later than 2050, and to a **51% reduction in emissions by the end of this decade**. The Act provides the framework for Ireland to meet its international and EU climate commitments and to become a leader in addressing climate change. As indicated by the premise of the legislation, the reduction of emissions is a key proponent of the Climate Action and Low Carbon Development (Amendment) Act 2021 and incorporates the following key provisions:

- Embeds the process of setting binding and ambitious emissions-reductions targets in law;
- Provides for a national climate objective, which commits to pursue and achieve no later than 2050, the transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy;
- Provides that the first two five-year carbon budgets proposed by the Climate Change Advisory Council should equate to a total reduction of 51% over the period to 2030, relative to a baseline of 2018;
- The role of the Climate Change Advisory Council has been strengthened;
- The government must adopt carbon budgets that are consistent with the Paris agreement and other international obligations;
- Actions for each sector will be detailed in the Climate Action Plan which must be updated annually; and
- Local Authorities must prepare individual Climate Action Plans which will include both mitigation and adaptation measures and will be updated every five years.

The Proposed Project represents a significant opportunity be a nationally important wind energy generator, contributing to the 51% reduction in emissions being sought, which is as outlined above a legally binding requirement. The Proposed Project is therefore considered compliant with the relevant policies and objectives set out at both the European (e.g. European Green Deal) and National tiers of governance in this regard.

Carbon Budgets

The first national carbon budget programme proposed by the Climate Change Advisory Council, approved by Government and adopted by both Houses of the Oireachtas in April 2022 comprises three successive 5-year carbon budgets[6]. The total emissions allowed under each budget are shown in Table 2-1 below.

Table 2-1:Proposed Carbon Budgets of the Climate Change Advisory Council

	2021 – 2025 Carbon Budget 1	2026 – 2030 Carbon Budget 2	2031 – 2035 Provisional Carbon Budget 3
	All Gases		
Carbon Budget (Mt CO_2eq)	295	200	151
Annual Average Percentage Change in Emissions	-4.8%	-8.3%	-3.5%
The figures are consistent with emissions in 2018 of 68.3 Mt CO_2eq reducing to 33.5 Mt CO_2eq in 2030, thus allowing compliance with the 51% emissions reduction target by 2030.			

Climate Action Plan 2023

The Climate Action Plan 2023 ('the CAP') launched in December 2022, sets out a roadmap to delivery on Ireland's climate ambition. It aligns with the legally binding economy-wide carbon budgets and sectoral ceilings that were agreed by Government in July 2022 following the Climate Action and Low Carbon Development (Amendment) Act 2021. The Act commits Ireland to a legally binding target of net-zero greenhouse gas emissions no later than 2050, and a reduction of 51% by 2030.

At the time of publication (December 2022), the key sources of Ireland's greenhouse gas (GHG) emissions include agriculture (33.3%), Transport (15.7%) and Energy (14.4%). Current and future actions require *"the full implementation of measures from Climate Action Plans 2023, and further future Climate Action Plans."* (emphasis added)

The CAP sets out indicative ranges of emissions reductions for each sector of the economy. Large-scale deployment of renewables - including onshore wind - is considered 'critical' to help decarbonise the power sector. In relation to achieving the sectoral emissions ceiling for the electricity sector the CAP states:

> *"The proposed pathway includes a massive and rapid build-out of renewable generation capacity (wind and solar power generation technologies) and will also rely on the continued build-out and strengthening of grid infrastructure, the deployment of zero-emissions gas and improved electricity demand management. The decarbonisation of the electricity sector will be an immense challenge as we face a growing demand for electricity and a need to ensure security of supply, while providing support for the decarbonisation of other sectors through the electrification of transport and heat."*

In relation to the generation of electricity, the CAP emphasis the continued role of onshore wind in addressing the decarbonisation of the electricity sector. Under the CAP onshore wind targets of 6GW by 2025 and 9GW by 2030 is set out. An increase in the deployment of renewable energy generation, transformational policies, measures and actions are all called for in the CAP. Achieving further emissions reductions between now and 2030 requires a "major step up" across three key measures as follows:

- Accelerate and increase the deployment of renewable energy to replace fossil fuels;
- Deliver a flexible system to support renewables and demand;
- Manage electricity demand.

The CAP acknowledges that *"Ireland accommodates one of the highest global percentages of variable renewable generation on the grid. However, to maximise the output of renewables, the electricity system must increase its flexibility further."*

Having regard to the targets and measures set out above, it is clear that there is strong policy support for the provision of additional renewable energy generators, such as the Proposed Project.

At the time of writing, the Climate Action Plan 2024 was not published. It is expected to be published before the end of the 2023.

2.2.3 Climate Target Progress

Ireland's Greenhouse Gas Emissions Projections (2021- 2040), June 2022

In June 2022, the EPA published an update on Ireland's Greenhouse Gas Emission Projections 2021-2040 using the latest Inventory data for 2020. The report provides an assessment of Ireland's progress towards achieving its emission reduction targets for 2021 and 2030 as set out under the EU Effort Sharing Decision (ESD) and Effort Sharing Regulation (ESR).

Under the Additional Measures scenario, renewable energy is projected to increase up to 78% of electricity generated by 2030 with emissions from the Energy Industry decreasing by 10% per annum from 2021-30. Increased coal use from 2021 and growing energy demand, including from data centres, threaten to negatively impact achievement of National targets, particularly for the first carbon budget period. The key findings set out within the report concerning Ireland's progress towards these targets, which are summarised below:

2030 Targets: Ireland's 2030 target under the EU ESR on greenhouse gas reduction is a 30% reduction of emissions compared to 2005 levels by 2030. EPA Projections show that existing measures will achieve a reduction of 5% on 2005 levels by 2030, significantly short of the target. However, if measures with the higher ambition (with Additional Measures) scenario are implemented, the reduction target can be achieved.

The Report assesses the future emission projections under two scenarios: 'With Existing Measures' and 'With Additional Measures'. The 'With Existing Measures' scenario assumes that no additional policies and measures, beyond those already in place by the end of 2019 are implemented. The 'With Additional Measures' scenario assumes implementation of the 'With Existing Measures' scenario in addition to further implementation of Government renewable and energy efficiency policies and measures, as set out in the CAP. Greenhouse gas emissions projections show total emissions decreasing from 2020 levels by 10.5% by 2030 under the With Existing Measures scenario and by 28% under the With Additional Measures scenario.

The energy sector contributed 14.9% of Ireland's total emissions in 2020 and is projected to decrease to 10.3% in 2030 (in the With Existing Measures scenario). The key trends underpinning the future progress of the sector under both scenarios are described below (underlined for emphasis):

- With Existing Measures
    - Emissions from the energy industries sector are projected to decrease by 37.8% from to 8.7 to 5.4 Mt CO2 eq over the period 2020 to 2030
    - In terms of the renewable energy generated, this scenario projects Ireland reaching approximately 70% of electricity consumption from renewable energy by 2030. Renewable electricity generation capacity is dominated by wind energy.

- With Additional Measures
    - Emissions from the energy industries sector are projected to decrease by 48.9% from 8.7 to 4.5 Mt CO2 eq over the period 2020 to 2030
    - Assumed that by 2030 renewable energy generation increases to approximately 80% of electricity consumption. This is mainly a result of further expansion in wind energy (comprising 5.0 GW offshore).

In the context of Ireland, and the possible outcomes under the above scenarios, the EPA emphasises the need for 'urgent implementation' of all plans, policies and new measures as a response to reducing carbon emissions:

> *''These latest Projections highlight the pace and scale of action needed to reduce greenhouse emissions in time to contribute to arresting global temperature rise. Implementation has consistently lagged behind planning. The message form the IPCC is that no further delays are possible to avoid the worst climate outcomes.*
>
> *Urgent implementation of all climate plans and policies, plus further new measures are needed for Ireland to meet the 51% emissions reduction target and put Ireland on track for climate neutrality by 2050."*

While it is clear that progress is on-going, it is also apparent that there are still significant challenges which will need to be overcome if Ireland is to achieve its 2030 emission targets of 51% reduction. With Additional Measures, if they are fully implemented, compliance can be achieved with the EU Effort Sharing Regulation target. As decarbonising electricity generation will have a significant positive contribution in achieving Ireland's emissions it is clear that additional renewable energy production such as that of the Proposed Project must be encouraged and supported if carbon saving targets are to be met.

2.3 Renewable Energy Policy and Targets

This section of the EIAR provides a breakdown of international and national renewable energy policy with regards to the Proposed Project. Under the national energy policy section, the following are discussed:

- EU Renewable Energy Policy
- National Renewable Energy Policy
- International and National Renewable Energy Target Progress.

National policy has developed in line with European and International policies, targets and commitments, in that the importance and urgency of decarbonising the energy generation sector, the economy and reducing greenhouse gas emissions has become increasingly apparent.

The Proposed Project complies with the nationally stated need to provide a greater amount of renewable energy onto the national grid and will further reduce the national reliance on fossil fuels for electricity generation.

2.3.1 EU Renewable Energy Policy

Energy Roadmap 2050

The Energy Roadmap 2050 was published by the European Commission in 2011 and analyses the transition of the contemporary energy system in ways that would be compatible with the greenhouse gas reductions targets as set out in the Renewable Energy Directive (Directive 2009/28/EC) while also increasing competitiveness and security of supply. To achieve these targets and objectives, the Roadmap states that significant investments will need to be made in new low-carbon technologies and renewable energy, e.g. wind energy infrastructure, energy efficiency and grid infrastructure. Five main routes are identified to achieving a more sustainable, competitive and secure energy system in 2050:

- High Energy Efficiency;
- Diversified Supply Technologies;
- High Renewable Energy Sources;
- Nuclear energy; and
- Carbon capture and storage.

The analysis found that decarbonising the energy system is technically and economically feasible. The Roadmap notes that all scenarios show the biggest share of energy supply technologies in 2050 comes from renewables. In this regard, it should be noted that the Climate Change Advisory Council states within their 2020 Annual Review (September 2020) that, "*while the share of renewable electricity generation, particularly wind, is increasing [in Ireland], the [overall] pace of decarbonisation of the [electricity generation] sector needs to accelerate*", as it is not compatible with a low-carbon transition to 2050. As such, a major prerequisite for a more sustainable and secure energy system is a higher share of renewable energy up to and beyond 2030 to 2050. Each of the scenarios assumes in the analysis that increasing the share of renewable energy and using energy more efficiently are crucial, irrespective of the particular energy mix chosen.

The Climate and Energy Framework

The 2030 Climate and Energy Framework (adopted by EU leaders in October 2014) represents the current governance system underpinning EU renewable energy policy. The framework defines EU wide renewable energy targets, which builds on the 2020 climate and energy package:

- A binding commitment at EU level of at least 40% domestic Green House Gas reduction by 2030 compared to 1990;
- An EU wide, binding target of at least 27% renewable energy by 2030; and
- An indicative EU level target of at least 27% energy efficiency by 2030.

The European Commission published its proposal for an Effort Sharing Regulation on the allocation of national targets for greenhouse gas emissions for the period 2021-2030 in May 2018. The Effort Sharing legislation forms part of a set of policies and measures on climate change and energy that will help move Europe towards a low-carbon economy and increase its energy security. Under the current Regulation, the national targets will collectively deliver a reduction of around 10% in total EU emissions from the sectors covered by 2020 and of 30% by 2030, compared with 2005 levels.

The proposal implements EU commitments under the Paris Agreement on climate change (COP21), discussed above in Section 2.1.1.1, and marks an important milestone in the allocation to Member States of a package of climate targets formally adopted as part of the 2030 Climate and Energy Framework.

The revised Renewable Energy Directive (EU) 2018/2001 came into force in December 2018. It establishes a binding EU target of at least 32% for 2030 with a review for increasing this figure in 2023. The revised Directive sets a 2030 target of 32.5% energy from renewable sources with a potential upward revision in 2023.

The European Green Deal was launched in December 2019 and proposes to increase the binding target of renewable sources in the EU's energy mix from 32% to **40% by 2030** via amendments to the Renewable Energy Directive (Renewable Energy Directive) as per the 'Fit for 55' package (July 2021)[4]. This supports Member States in making the most of their cost-effective renewable energy potential across sectors through a combination of sectoral targets and measures. It aims at making the energy system cleaner and more efficient by fostering renewables-based electrification and, in sectors such as industry and transport where this is more difficult, it will promote the uptake of renewable fuels.

REPowerEU Plan

REPowerEU, launched in May 2022 by the European Commission, proposes an outline of a plan to make Europe independent from Russian fossil fuels, starting with gas, due to the high and volatile energy prices, and security of supply concerns following Russia's unprecedented military attack on Ukraine. Currently, the EU imports 90% of its gas consumption, with Russia providing around 45% of those inputs. Russia also accounts for around 25% of oil and 45% of coal imports. Phasing out dependence on fossil fuels can be done well before 2030, increasing the resilience of the EU-wide energy system based on two pillars:

1. Diversifying gas supplies, via higher Liquefied Natural Gas (LNG) and pipeline imports of biomethane and renewable hydrogen production and imports from non-Russian suppliers
2. Reducing faster the use of fossil fuels by boosting energy efficiency, increasing renewables and addressing infrastructure bottlenecks.

With full implementation of the measures in REPowerEU plan, at least 155 bcm of fossil gas use could be removed, which is equivalent to the volume imported from Russia in 2021. Nearly two thirds of that reduction can be achieved within a year. A part of this plan includes *'Speeding up renewables permitting to minimise the time for roll-out of renewable projects and grid infrastructure improvements'*. This will make the sector more efficient and reach the set goals faster.

In September 2023, the European Parliament agreed to update the Renewable Energy Directive. The updates including raising the share of renewables in the EU's final energy consumption to 42.5% by 2030 with Member States encouraged to achieve 45% and a more efficient approval procedure for deploying renewables in Europe. In addition, as a part of the REPowerEU plan, the European Commission has proposed a series of additional targeted amendments to the renewable energy directive to reflect the ongoing changes in the energy landscape and the continued invasion of Ukraine.

As such, it is submitted that the Proposed Project is strongly supported by EU energy policy.

2.3.2 National Renewable Energy Policy

White Paper on 'Ireland's Transition to a Low Carbon Energy Future' 2015 – 2030

On 12th May 2014, the Green Paper on Energy Policy in Ireland was launched which marked the start of a public consultation process on the future of Ireland's energy policy over the medium to long-term. The Department of Communications, Climate Action & Environment acknowledged that energy is an integral part of Ireland's economic and social landscape and that *"a secure, sustainable and competitive energy sector is central to Ireland's ability to attract and retain Foreign Direct Investment and sustain Irish enterprise. The three key pillars of energy policy are to focus on security, sustainability and competitiveness".*

Following on from an extensive consultation process, a Government White Paper entitled 'Ireland's Transition to a Low Carbon Energy Future 2015-2030' was published in December 2015 by the (then) Department of Communications, Energy and Natural Resources ("DCENR"). This Paper provides a

[4] *https://www.consilium.europa.eu/en/policies/eu-plan-for-a-green-transition/*

complete energy update and a framework to guide policy up to 2030. The Paper builds upon the White Paper published in 2007 and takes into account the changes that have taken place in the energy sector since 2007.

The policy framework was developed to guide policy and actions that the Irish Government intends to take in the energy sector up to 2030 and also reaching out to 2050 to ensure a low carbon future that maintains Ireland's competitiveness and ensures a supply of affordable energy. The Energy Vision 2050, as established in the White Paper, describes a 'radical transformation' of Ireland's energy system which will result in GHG emissions from the energy sector reducing by between 80% and 95%, compared to 1990 levels. The paper advises that a range of policy measures will be employed to achieve this vision with emphasis on the generation of electricity from renewable sources, which there are plentiful indigenous supplies and increasing the use of electricity and bio energy to heat homes and fuel transport.

In this White Paper, the DCENR acknowledges that onshore wind is one of the cheapest forms of renewable energy in Ireland, stating that:

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

National Energy Security Framework

More recently, the National Energy Security Framework (DECC, April 2022) highlights clearly the impacts the Russian invasion of Ukraine and the resulting war has had on Europe's energy system. The resulting decision by the European Union to phase out the import of Russian gas, oil and coal has brought to the fore the importance of security of supply and how energy policy is designed for long-term resilience. It takes account of the need to decarbonise society and economy, to reduce Ireland's emissions by 51% over the decade to 2030 and reach net zero emissions by 2050. According to the SEAI's Energy in Ireland (2020) report, oil accounts for 54% of Ireland's primary energy requirement making it one of the highest rates of oil dependency in the EU. The International Energy Agency, of which Ireland is a member country, includes a 10-point plan to cut oil use which calls for an acceleration in the deployment of wind and solar projects. Ireland's response per the Framework is set out over three themes:

- Theme 1 – managing the impact on consumers and businesses;
- Theme 2 – ensuring security of energy supply in the near-term;
- Theme 3 – reducing our dependency on imported fossil fuels in the context of the phasing
- out of Russian energy imports across the EU.

In relation to theme 3, the Framework highlights that replacing fossil fuels with renewables, including wind energy, will be a focus area of work. The Framework calls for "Supportive policies across Government and State agencies" which "can reduce barriers and fast track permitting for renewable energy generation projects. Similarly, renewable energy developers need to match this through taking a leadership role in delivering high quality applications to relevant consenting authorities, meeting project milestones on time and minimising delays." There are a number of 'Responses' set out in the Framework aimed at reducing reliance on imported fossil fuels and increasing indigenous renewable energy generation, including Response 25 which seeks the alignment of all elements of the planning system to support accelerated renewable energy development. Having regard to the above, it is clear that the provision of additional renewable energy generation is vital in helping to secure the State's energy supplies and reduce reliance on imported fossil fuels.

Having regard to the above, it is clear that the provision additional renewable energy generation, such as the Proposed Project, is vital in helping to secure the State's energy supplies and reduce reliance on imported fossil fuels.

2.3.3 Renewable Energy Target Progress

The SEAI *Energy in Ireland 2022* was published in December 2022 and set outs the most recent updates to Ireland's progress towards its binding European and National renewable energy targets. Based on confirmed 2020 data, the report found that Ireland failed to meet the EU overall renewable energy supply target of 16% for 2020. Although Ireland committed to reducing its CO2 emissions by 4.8% per annum from 2021- 2025 under the first carbon budget, energy related emissions were instead up by 5.4% in 2021.

The SEAI report illustrates (Figure 6) the summary of sectoral ceilings within the first two carbon budgets, over the periods 2021-2025 and 2026-2030 – copied below in Figure 2-2.

Figure 6: Carbon budgets and sectoral ceilings for 2021–2025 and 2026–2030

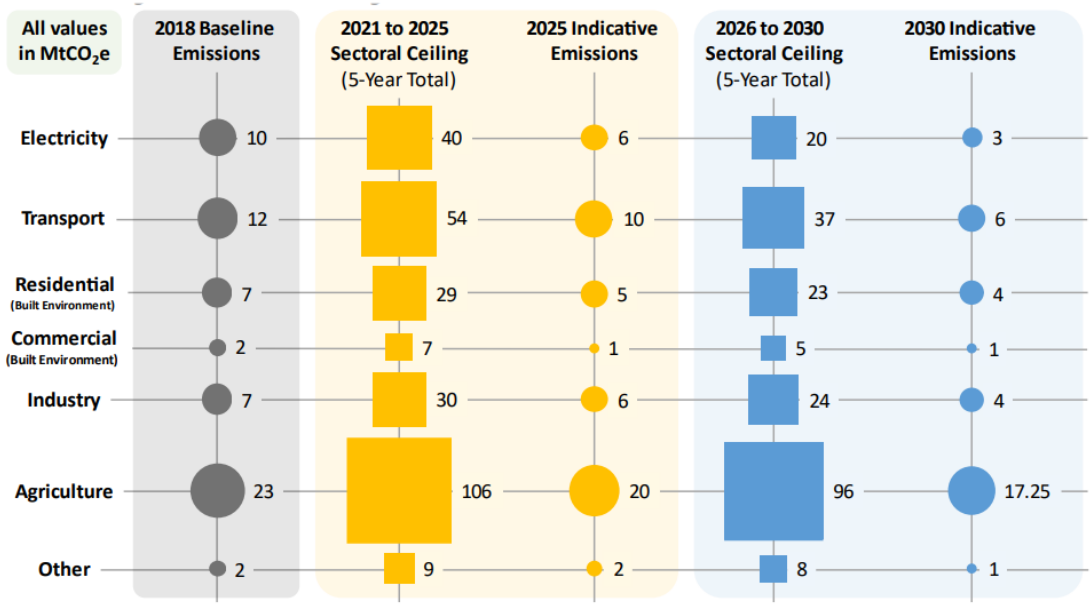


Figure 2-2:Carbon Budgets and Sectoral Ceilings for 2015-2025 and 2026-2030 (SEAI Energy in Ireland 2022)

A guideline trajectory the electricity sector's emission ceiling in both carbon budgets is shown below in Table 2-2. The data shows that "*electricity emissions were 'on trajectory' in 2021 (10.3 MtCO2), despite the greater dependence on coal- and oil-fired electricity generation. However, our provisional estimate for electricity emissions in 2022 (10.8 MtCO2) is higher than the guideline trajectory (9.0 MtCO2e). This is due to an increase in electricity demand for 2022, not all of which could be supplied through renewable electricity, and the significant pace of annual reductions (-12.6% down on each previous year) needed to satisfy electricity's sectoral emission ceiling.*"

The report confirms that wind accounted for 84% of renewable electricity generated in 2021 having 4,339MW of installed wind capacity in 2021. Up to September 2022, the report confirmed 78MW of added wind capacity.

Security of supply is a focus in the report, noting "*Ireland's import dependency [of energy] has been increasing steadily, as the output from the Corrib gas field reduces faster than we are adding new renewable sources.*" In 2021 Ireland's import dependency for energy was 80%; ranked eighth highest of the 27 Member States in terms of import dependency in 2020, the last year in which full data was available.

In order to reduce Irelands emissions there is a need to increase the renewable share of electricity, heat and transport. Up until 2020, renewable energy targets and results were set and calculated under the rules and methodologies of the first EU Renewable Energy Directive (REDI) however, from 2021 onwards, renewable results must be calculated under the REDII methodology. This updated Directive contains

stricter requirements on the countability of biomass, biogas, and biofuels, as they relate to our renewable energy share (RES) results. The second EU Renewable Energy Directive (REDII) continues to promote the growth of renewable energy and set renewable energy share (RES) targets out to 2030. The changes in criteria and caps under REDII change how the RES results in 2021 are calculated compared to 2020, even where there is little to no change in the underlying renewable energy:

Table 2-2 National Renewable Energy Targets

	2020	RES 2020 Note	2021*	Note	New 2030 Target
Overall RES	13.6%	Ireland failed to meet its target of 16%	12.5%	Drop is almost entirely due to the shift in the REDII methodology	34.1%
RES-T (Transport energy from renewable energy sources)	10.2%	Ireland achieved its target of 10%	4.3%	Drop is almost entirely due to the shift in REDII methodology.	14%
RES-E (Electricity from renewable energy sources)	39.1%	Ireland failed to meet its target of 40%	36.4%	RES-E fell by 2.6% to 36.4% with over half this drop due to the shift in the REDII methodology and exclusion of some biomass; the remaining drop was due to reduced renewable electricity generation due to less wind in 2021.	80%
RES-H (Heat from renewable energy sources)	6.3%	Ireland failed to meet its target of 12%	5.2%	This decrease in RES-H is mainly due to the shift in REDII methodology and the introduction of new sustainability and verification criteria for biomass fuels.	24%

**calculated under the new REDI methodology*

REDII introduced a binding EU-wide target for overall RES of 32% in 2030 and requires Member States to set their national contributions to the EU-wide target. As per the National Energy and Climate Plant (NECP) 2021-2030, Ireland's overall RES target is 34.1% in 2030.

The second mandatory target set by the RED related to the renewable energy share in transport sector. This is commonly referred to as the RES-T target. The 2020 RES-T target was for at least 10% of energy consumed in road and rail transport to come from renewable sources. The actual RES-T achieved in 2020 was 10.2%, meaning that Ireland did meet this target. REDII sets a new RES-T target of 14% by 2030.

The current RES-E target to 2030 of 80% ensures that "*renewable electricity continues to form the backbone of our renewable energy use for the coming decade and beyond.*"

The Climate Advisory Council (CCAC) notes within their *2022 Annual Review* that urgent implementation of the measures identified in the [8]CAP 2021 and identification of further new measures would be needed to reach national emission reduction targets in the electricity sector. The CACC stress the importance of reducing emissions in the electricity sector given the reliance of other sectors on the successful decarbonisation of the electricity sector.

EirGrid's recent analysis presented in *'All Island Generation Capacity Statement 2022 – 2031'* (October 2022) found that the existing generation capacity is poor. Some generation capacity, due to close in September 2023, have submitted notices that they will not be available throughout 2022 and 2023. This represents 590 MW (rated) that will be unavailable to the national grid. Furthermore, a sizable portion (364MW) of the forecasted new generation has failed to materialise, with developers terminating their capacity market contracts. These issues combined with existing social and economic growth driving electricity demand upwards means that the new generation capacity, especially renewable electricity, is

urgently required. The scale of the capacity issue is clear, with significant capacity deficits forecasted across all scenarios for the remainder of the decade. Accordingly, the Proposed Project will contribute to meeting this increasing electricity demand.

With regard to the requirements needed to achieve the ambitions targets set in the Governments Climate Action Plan 2023, it is stated that:

> *"The electricity sector has a ceiling of 40 MtCO2eq. for the first budgeting period (2021-2025), equating to an average of 8 MtCO2eq. per annum. As emissions in 2021 were 9.98 MtCO2eq., electricity will need to achieve average annual emissions of circa 7.5 MtCO2eq. from 2022 to 2025.*
>
> *At a time when the energy system is under severe pressure to ensure security of supply, amid projections of rapid electricity growth over the coming decade, the electricity sector has been set one of the smallest carbon budget allocations and the steepest decline (-75%) of all sectors. The scale of the challenge to meet the carbon budget programme is immense and requires policies to be moved from an 'end of decade' target trajectory to a 'remaining carbon budget' target."*

In relation to the scale of the challenge, the CAP calls for *"a major acceleration and increase in onshore wind turbines across the country."* To accelerate renewable electricity generation a target of 9GW by 2030 of onshore wind is set, framed in the context of ensuring that renewable energy generation projects and associated infrastructure are considered to be "*in the overriding public interest.*" This is very significant and tips the balance of consideration in favour of renewables even if there is an environmental impact. It follows the adoption of EU Regulation *2022/2577 Laying Down a Framework to Accelerate the Deployment of Renewable Energy* by the EU Commission to give effect to the Repower EU Plan. The Regulation provides that the planning, construction and operation of plants and installations for the production of energy from renewable sources shall be presumed as being in the *"overriding public interest and serving public health and safety"* for the purpose of the Habitats Directive (Directive 94/43/EEC), the Birds Directive (Directive 2009/147/EC) and the Water Framework Directive (Directive 2000/60/EC).

EirGrid have also released their *Strategy 2020-2025: Transform the Power System for Future Generations* which is driven by climate change and the need to transform the electricity sector. Currently, the electricity grid can operate with up to 65% of renewable power but by 2030 this must increase to 95%. SEAI 's National Energy Projections to 2030 notes that wind energy deployment has "*made the most significant contribution to RES-E to date. The historic build rate (2005-2010) was 180MW per year. Since 2010 the build rate has increased to an average of over 200MW per year. In 2017 the installed capacity increased by 335MW to just over 3.3GW total installed capacity."* Furthermore, "*Post 2020, as electricity demand continues to grow at an anticipated rate of 3% per annum, increasing levels of deployment will be needed just to maintain the share achieved in 2020."*

Ireland faces significant challenges through efforts to meet its renewable energy targets, EU targets for renewable energy by 2030 and its commitment to transition to a low carbon economy by 2050. The Proposed Wind Farm will aid Ireland in addressing these challenges as well as addressing the country's over-dependence on imported fossil fuels.

Through the production of renewable energy which will connect to the national grid the Proposed Project has the potential to be a major contributor to meeting the country's binding targets.

2.4 Strategic Planning Policy Context

2.4.1 Introduction

This section of the EIAR provides the strategic planning context of the Proposed Project. As is examined below the Proposed Project is in line with national, regional and local policies, frameworks, guidelines and plans. This section below has been broken down into the following sections:

- National Policy Context
- Regional Policy Context
- Local Policy Context
- Other Relevant Material Considerations

As a renewable energy project, the Proposed Project is consistent with the overall national, regional and local policy objectives to increase penetration and deployment of renewable energy resources and has been designed in the context of the relevant wind energy and other key guidelines. .

2.4.2 National Policy Context

2.4.2.1 National Planning Framework: Project Ireland 2040

The National Planning Framework (NPF), published in February of 2018, forms the top tier of the national planning policy structure which establishes the policy context for the Regional Spatial and Economic Strategies (RSES) and local level development plans. In an effort to move away from developer led development to one informed by the needs and requirements of society up to 2040, a number of objectives and policies have been put in place in order for the country to grow and develop in a sustainable manner.

- Developing a new region-focused strategy for managing growth;
- Linking this to a new 10-year investment plan, the Project Ireland 2040 National Development Plan 2018-2027;
- Using state lands for certain strategic purposes;
- Supporting this with strengthened, more environmentally focused planning at local level; and
- Backing the framework up in law with an Independent Office of the Planning Regulator.

The NPF notes that the population of Ireland is projected to increase by approximately 1 million people by 2040 which will result in a population of roughly 5.7 million. This population growth will place further demand on both the built and natural environment. In order to strengthen and facilitate more environmentally focused planning at the local level, the NPF states that future planning and development will need to:

> *"Tackle Ireland's higher than average carbon-intensity per capita and enable a national transition to a competitive low carbon, climate resilient and environmentally sustainable economy by 2050, through harnessing our country's prodigious renewable energy potential."*

A key focus throughout the NPF is the fostering of a transition toward a low carbon, climate-resilient society. In this regard, one of the stated key elements of the NPF is an Ireland which has a secure and sustainable renewable energy supply and facilitates the ability to diversify and adapt to new energy technologies. Key features identified in the NPF to facilitate the transition towards a low carbon energy future include:

- A shift from predominantly fossil fuels to predominantly renewable energy sources.
- Increasing efficiency and upgrades to appliances, buildings and systems.

- Decisions around development and deployment of new technologies relating to areas such as wind, smart grids, electric vehicles, buildings, ocean energy and bio energy.
- Legal and regulatory frameworks to meet demands and challenges in transitioning to a low carbon society.

Relevant to the subject development, the National Strategic Outcome 8 (Transition to Sustainable Energy), notes that in creating Ireland's future energy landscape, new energy systems and transmission grids will be necessary to enable a more distributed energy generation which connects established and emerging energy sources, i.e. renewables, to major sources of demand. The successful transition to a low carbon power system will depend on the pillars of **1) Sustainability**, **2) Security of supply** and **3) Competitiveness**. A common theme underpinning these pillars is the need for a fit-for-purpose transmission and distribution energy network. Specifically, the NPF states that reinforcement of the distribution and transmission network to facilitate planned growth and distribution of a more renewables focused source of energy across the major demand centres, e.g. the functional purpose of the extant grid connection. Ireland's national energy policy under Objective 55 aims 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'*. The NPF aims to ensure that decisions that are made today meet our future needs in a sustainable manner.

> *"The manner in which we plan is important for the sustainability of our environment. Our planning system has influence across a wide range of sectors, both directly and indirectly and interacts with many common issues related to effective environmental management, including water services, landscape, flood risk planning, protection of designated sites and species, coastal and marine management, climate mitigation and adaptation, and land use change."*

An overarching objective of the NPF is to foster a transition toward a low carbon, climate-resilient society, which reflects the policy ethos established at the European level of governance (e.g. climate change and renewable energy targets – Section 2.1). In this regard, one of the key themes of the NPF is the realisation of an Ireland which has a secure and sustainable renewable energy supply and the ability to diversify and adapt to new energy technologies. The NPF references the National Climate Policy Position which established the fundamental objective of achieving transition to a competitive, low carbon, climate resilient and environmentally sustainable economy by 2050. The NPF emphasises that rural areas have a strong role to play in securing a sustainable renewable energy supply for the country and acknowledges that *"rural areas have significantly contributed to the energy needs of the country and continue to do so"*. In this regard, the NPF states:

> *"In meeting the challenge of transitioning to a low carbon economy, the location of future national renewable energy generation will, for the most part, need to be accommodated on large tracts of land that are located in a rural setting, while also continuing to protect the integrity of the environment".*

The NPF acknowledges that greenhouse gas emissions from the energy sector must be reduced by at least 80% by 2050 when compared to 1990 levels while ensuring a secure supply of energy exists. New energy systems and the maintenance / safeguarding of existing grid assets will be necessary for a more distributed, renewables focused energy system required to harness Ireland's considerable indigenous energy sources and *"connect the richest sources of that energy to the major sources of demand".*

In regard to the above, it is clear that the provision of new renewable energy generation (such as the Proposed Project) is in line with the aims and objectives of the NPF which seeks to transition to a low carbon economy.

2.4.2.2 National Development Plan 2021- 2030

The National Development Plan 2021 – 2030 (NDP) was published on 4th October 2021 and sets out the major public investment projects identified by Government which are to play a significant role in

addressing the opportunities and challenges faced by Ireland over the coming years such as Covid-19, Brexit, housing, health, population growth, and most relevant to the subject development, climate change. It is stated that the NDP 2021 – 2030 will be the *'largest and greenest ever delivered in Ireland'*, and in this regard, the NDP highlights that extensive consultation was undertaken to ensure that the plan adequately supports the implementation of climate action measures. Reflecting on the recent publication of the IPCC's 6th Assessment Report, the NDP notes that the Irish Government is fully committed to 'playing its part' to ensure that the worst climate change damage can be avoided, e.g. significant reductions in CO_2 and other greenhouse gas emissions as assisted by the achievement of both European and National renewable energy targets. Specifically, the NDP states that,

> *"The next 10 years are critical if we are to address the climate crisis and ensure a safe and bright future for the planet, and all of us on it.*
>
> *The investment priorities included in this chapter [Ch. 13] must be delivered to meet the targets set out in the current and future Climate Action Plans, and to achieve our climate objectives. The investment priorities represent a decisive shift towards the achievement of a decarbonised society, demonstrating the Government's unequivocal commitment to securing a carbon neutral future."*

Notwithstanding this, the NDP acknowledges that it is not its role to set out a specific blueprint for the achievement of Ireland's climate targets; but as noted above, facilitate capital investment allocations for the climate and environmental strategic priorities.

One of the NDP's strategic climate priorities in the need for low-carbon, resilient electricity systems; specifically, the plan commits to increasing the share of renewable electricity up to 80% by 2030. This is characterised by the NDP as an *'unprecedented commitment to the decarbonisation of electricity supplies'* which, if compared to the CAP and the objective to increase the proportion of renewable electricity to up to 80% by 2030 and a target of 8 gigawatt (GW) from onshore wind, is certainly ambitious and an explicit driver for the deployment of new renewable generators and the safeguarding / maintenance of existing assets, e.g. the subject development. It is noted that the reliability of electricity supplies will also be strengthened through investment in the electricity transmission and distribution grid. The focus of investment in regulated network infrastructure is to contribute to a long-term, sustainable and competitive energy future for Ireland.

2.4.3 Regional Policy

2.4.3.1 Southern Regional Spatial and Economic Strategy (RSES)

The Southern Regional Assembly (SRA) was established in 2015, the Regional Spatial and Economic Strategy (RSES) for the Southern Region (Carlow, Clare, Cork, Kerry, Kilkenny, Limerick, Tipperary, Waterford and Wexford) came into effect on 31st January 2020. The RSES provides a long-term, strategic development framework for the future physical, economic and social development of the Southern Region. The RSES seeks to achieve balanced regional development and full implementation of Project Ireland 2040 – the National Planning Framework.

Adopted on the 31st of January 2020, the principal statutory purpose of the Regional Spatial and Economic Strateg (RSES) is to support the implementation of the Project Ireland 2040 National Planning Framework (NPE) / National Development Plan and the economic policies and objectives of the Government. The RSES aims to build on the region's strengths and potential to become a more prosperous, sustainable, climate resilient and attractive region for the benefit of all its people. up to 2040 and beyond.

The RSES notes that planning policy and objectives must incorporate resilience and adaptability to ensure that the Region are agile and responsive to change. At present, Irish per capita Green House Gas (GHG) emissions are among the highest in Europe and Government has identified '*Climate Change as the most*

important long-term challenge facing Ireland' with a stated commitment to 'the transformation required to achieve a low carbon resilient future'. Transition to a low carbon energy future will require a wide range of policy responses across industry and public sectors, including electricity.

To achieve national and EU targets in the context of the electricity sector, the RSES notes that further investment is required to develop alternative renewable energies with greater interconnection to energy resources. This key enabling action is captured under Strategic Aim 8 which sets out the need to "*safeguard and enhance the environment through sustainable development, prioritising action on climate change across the region, driving the transition to a low carbon and climate resilient society*." Both the NPF and RSES emphasise, however, that the planning process is well placed to implement and integrate climate change objectives.

- **RPO 9 (Holistic Approach to Delivering Infrastructure)**: It is an objective to ensure investment and delivery of comprehensive infrastructure packages to meet growth targets that prioritise the delivery of compact growth and sustainable mobility as per the NPF objectives including for renewable energy and climate change adaption.

The RSES sets out a number of Regional Policy Objectives (RPOs) designed to facilitate greater integration of renewables into the National Grid. The RSES notes that there is significant potential to use renewable energy across the Region to achieve climate change emission reduction targets. As such, the RSES supports renewable industries such as the Proposed Project.

- **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 95 (Sustainable Renewable Energy Generation)**: 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 96 (Integrating Renewable Energy Sources)**: It is an objective to support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate renewable energy sources and ensure our national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grows.

- **RPO 99 (Renewable Wind Energy)**: 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.

- **RPO 100 (Indigenous Renewable Energy Production and Grid Injection)**: It is an objective to support the integration of indigenous renewable energy production and grid injection.

An important element within the Southern RSES is the introduction of a regional scale approach to identifying and capitalising on renewable energy opportunities.

- **RPO 98 (Regional Renewable Energy Strategy)**: It is an objective to support the development of a Regional Renewable Energy Strategy with relevant stakeholders.

This policy instrument, if implemented correctly, could assist in facilitating a more consistent approach to renewable energy / wind strategies at the county level, and furthermore, could identify opportunities for large cross-county renewable schemes via stakeholder led collaboration.

At present, the RSES notes that the Region has more renewable energy generation than demand which indicates a strategic role for the region's energy assets in national energy generation and transmission. With projected increases in population and economic growth, the demand for energy is set to increase in the coming years. In the context of transitioning to a more energy efficient society and increasing renewable sources of energy, the RSES notes that there is a need to set a policy approach which addresses meeting national targets for renewable electricity generation, climate change and security of energy supplies, both regionally and nationally.

The sustainable growth of the Southern Region requires the provision of services and infrastructure central to the RSES strategy in a plan led manner to ensure the sustainable management of environmental resources. As such, existing regional infrastructure represents major and on-going capital and infrastructural investment in strategic national assets and is considered by the RSES as essential for the continued provision of a secure and reliable electricity supply. The sustainable development of the Region, however, must also be balanced with consideration to natural heritage and biodiversity, particularly landscape.

- **RPO 129** notes that it is an objective of the Regional Authority to develop a *Regional Landscape Strategy* in order to facilitate landscape protection, management and change in the region.

The RSES sets out a number of infrastructural RPOs, relevant to the Proposed Project, which indicate that the Region is open to, and ready to invest in, renewable energy generation.

- **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.

- **RPO 222 (Electricity Infrastructure)**: It is an objective to support the development of a safe, secure and reliable supply of electricity and to support and facilitate the development of enhanced electricity networks and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this plan under EirGrid's (2017) Grid Development Strategy (subject to appropriate environmental assessment and the planning process) to serve the existing and future needs of the Region and strengthen all-island energy infrastructure and interconnection capacity.

The RSES supports the Southern Region as a Carbon Neutral Energy Region. This policy instrument, if implemented correctly, could assist in facilitating a more consistent approach to renewable energy / wind

strategies at the county level. At present, the RSES notes that the Region has more renewable energy generation than demand which indicates a strategic role for the region's energy assets in national energy generation and transmission. With projected increases in population and economic growth, the demand for energy is set to increase in the coming years. In the context of transitioning to a more energy efficient society and increasing renewable sources of energy, the RSES notes that there is a need to set a policy approach which address meeting national targets for renewable electricity generation, climate change and security of energy supplies, both regionally and nationally.

2.4.4 Local Policy

2.4.4.1 Tipperary County Development Plan 2022-2028

The Tipperary County Development Plan 2022-2028 (TCDP) came into effect on the 22nd of August 2022. The TCDP incorporates the aims, objectives, policies and guidelines to provide for the proper planning and sustainable development of County Tipperary. The TCDP outlines the ambition for the development of the county's renewable energy supply. The Council acknowledges the importance of renewable energy in reducing anthropogenic greenhouse gas emissions and the contribution of renewable energy in achieving national and EU target net zero greenhouse gas emissions by 2050. This target is underpinned by the core ambitions of the TDCP. The TDCP states:

> *"Renewable energy and the bioeconomy are important aspects of our diverse and vibrant rural economy, with synergies between and across other areas such as climate action, job creation and amenity development. It is understood that by supporting a climate resilient, biodiversity-rich, environmentally-sustainable and climate-neutral economy we can make optimum use of our available renewable energy resources. The Council, with the support of the Tipperary Energy Agency and through the Core Strategy of this Plan, has strongly committed to the support of renewable energy as part of sustainable economic growth in line with the National Renewable Energy Action Plan of the Government"*

Chapter 10 of the TCDP, Renewable Energy and Bioeconomy, provides renewable energy targets out as far as 2028. The TCDP has set a target of 600MW of wind energy to be constructed and operational by 2028. The county currently has 475MW of wind energy installed. The Proposed Project will contribute substantially to meeting this target.

Chapter 10 also includes the following policies and objectives in relation to the development of renewable energy in the county. The planning policy relevant to the Proposed Project include, *inter alia:*

- **Policy 10 – 1:** *Support and facilitate new development that will produce energy from local renewable sources such as hydro, bioenergy, wind, solar, geothermal and landfill gas, including renewable and non-renewable enabling plant, subject to compliance with normal planning and environmental criteria, in co-operation with statutory and other energy providers. The provisions of the Tipperary Renewable Energy Strategy (and any review thereof) as set out in Volume 3, will apply to new development.*
- **Policy 10 – 2:** *Support and facilitate disruptive technologies and innovations, including natural carbon capture systems that will support the generation of energy from local renewable energy sources and support energy storage and carbon capture, subject to compliance with normal planning and environmental criteria, in co-operation with statutory and other energy providers.*
- **Objective 10-A**: *Support the Climate Action Plan (DECC, 2019) as it relates to renewable energy production, having consideration to the strategic importance and potential benefits of renewable energy investment to rural communities.*
- **Objective 10-C**: *To continue to support renewable energy development and to maintain a positive framework for development through the review of the Renewable Energy Strategy over the lifetime of the Plan.*

2.4.4.2 Tipperary Renewable Energy Strategy 2016

The Tipperary Renewable Energy Strategy (RES) was published in 2016 and is incorporated into the TCDP 2022-2028 as appendix 2 of volume 3. The RES has been developed as a planning framework to support the implementation of renewable energy in the county. As the RES was published in 2016, it was developed to meet the policies and objectives of the North Tipperary County Development Plan 2010 (as varied) and the South Tipperary County Development Plan 2009 (as varied). There is an objective in the TCDP 2022-2028 to review the RES over the lifetime of the plan (see objective 10-C above). Although the RES is based on outdated national energy policy and targets, it will remain in effect until the review and update take place.

The RES includes a Wind Energy Strategy (WES), which is informed by a Landscape character assessment. The WES identifies areas where wind energy development is 'open for consideration' and where wind energy developments are considered 'unsuitable'. The WES also includes wind energy planning policy and development management standards to manage wind energy development.

The aim of the Wind Energy Strategy is to set out one integrated, comprehensive suite of policies for wind energy development in Tipperary as set out in the Introduction:

> *"The aim of this Strategy is to .... develop an updated, county-wide tool for identifying potentially suitable locations for wind energy development and to guide future assessment of wind energy planning applications in the county".*

In relation to wind energy policy, the WES, includes the following relevant objectives:

Table 2-3: Tipperary Renewable Energy Strategy – Wind Energy Planning Policies

Planning Objectives	
TWIND 1:	*It is the policy of the Council to support, in principle and in appropriate locations, the development of wind energy resources in county Tipperary. The Council recognises that there is a need to promote the development of 'green electricity' resources and to reduce fossil fuel dependency and greenhouse gas emissions in order to address the global issue of climate change, and to comply with European and International policies with regards to renewable and sustainable energy resources.*
TWIND 2:	*It is the policy of the Council to ensure that all wind energy development in the county complies with the provisions of all applicable government legislation and guidance on wind energy development and renewable energy resources (and any review thereof).*
TWIND 3:	*It is the policy of the Council that when assessing planning applications for wind energy development, to require compliance with the Wind Energy Development Guidelines, Guidelines for Planning Authorities (DoEHLG) 2006 or any revision thereof, and the policy and objectives of the County Development Plan (as Varied).*
TWIND 5:	*It is the policy of the Council that when granting planning permission for wind energy developments, to have regard to the proper planning and sustainable development of the area and in particular Chapter 7 of the Wind Energy Development Guidelines, Guidelines for Planning Authorities (DoEHLG) 2006 or any revision thereof. In addition, the Council may include conditions regarding: a) Surface water management plans; b) Environmental management plans for all phases of the development; c) Limiting construction to a certain part of the year; d) Duration of the planning permission and eventual decommissioning of the development; e) Landscaping; f) Surveys on birds and relevant protected species and other baseline environmental data collection; and, g) Ongoing monitoring during operation of the wind energy development h) Monitoring during construction phase i) Protection of habitats and species of conservation concern j) Protection of designated sites.*

The Proposed Project is located in an area deemed 'Open for Consideration'. Areas 'Open for Consideration' are assessed in accordance with the following parameters:

"Areas 'Open for Consideration' – wind energy development in these areas may or may not be appropriate, depending on the character of the landscape and the potential impact of the proposed development. Any impact on the environment must be low and subject to proper planning and sustainable development, and the guidelines set out in this policy document."

Areas Open for Consideration are also subject to the following guidelines set out in Table 2-4 below:

Table 2-4: Tipperary Renewable Energy Strategy – Guidelines for Areas Open to Consideration

TWIND 4.1	*Proposals shall demonstrate conformity with existing and approved wind farms to avoid visual clutter. In this respect, developers should consider the cumulative impact of new development in the context of the location of both existing and permitted developments.*
TWIND 4.2	*Proposals in Areas 'Open for Consideration' shall be sited having consideration to the landscape sensitivity and capacity analysis set out in the Tipperary Landscape Character Assessment 2016 and the provisions of the County Development Plan (as varied) in relation to landscape (Chapter 7). All applications shall have regard to the visual impact of turbines and ancillary development (such as access roads, boundary fencing, control buildings and grid connections).*
TWIND 4.3	*Within Areas 'Open for Consideration', proposed development within areas which already accommodate turbines, sub-stations and powerlines shall be considered appropriate from a sequential approach to the development of infrastructure, until these areas reach capacity.*
TWIND 4.4	*All Projects are required to be screened for Appropriate Assessment Screening in accordance with Article 6(3) of the Habitats Directive and the provisions of the County Development Plan (as varied).*
TWIND 4.5	*Applications for wind development shall be accompanied by a technical assessment in relation to the slope stability, landslide susceptibility of the development site and the proposed project. This assessment shall incorporate slope stability mapping and groundcover assessment in the context of potential cumulative effects arising from multiple developments.*
TWIND 4.6	*All proposals for wind energy development will have regard to the cumulative effect of the development on the environment when considered in conjunction with other existing and permitted wind energy developments in the area.*
TWIND 4.7	*All applications will have regard to the impact on existing built environment, particularly neighbouring residential properties and other sensitive amenity areas.*
TWIND 4.8	*All applications will have regard to the impact of any proposal for wind energy development on surrounding tourism and recreational related activities and the compatibility of same will be carefully considered in the assessment of any planning application.*
TWIND 4.9	*All applications will have regard to the impact of any proposal for wind energy development in the context of any flood risk in the area. A comprehensive flood risk assessment for proposals in an area at risk of flooding, adjoining same or where cumulative impacts may result in a flood risk elsewhere, in low lying areas or in areas adjacent to streams.*

TWIND 4.10	*All applications will ensure that details of the proposed grid connection and all associated infrastructure are considered in the Environmental Impact Statement (EIA) and Natura Impact Statement as may be required.*
TWIND 4.11	*All applications will have regard to the impact on rivers and streams and will demonstrate compliance with the Water Framework Directive.*
TWIND 4.12	*Wind energy development proposed in areas of lowland raised bog/peatland shall ensure that negative impacts including habitat disturbance and loss, and avoidance of hydrological disruption and risk of erosion are avoided or mitigated through design. Site specific geo-technical investigations shall be submitted as part of EIA unless otherwise agreed with the council.*

While the local policy that applies to the Site as set out in the RES sets out that new wind energy development in these areas '*may or may not be appropriate*', the assessments carried out as part of this EIAR demonstrate that the Site is capable of accommodating the Proposed Project without significant negative effects. A detailed environmental constraints assessment was conducted which led to the siting of turbines within the 'Open for Consideration' areas. The inclusion of the constraints on a map of the study area allows for a viable area to be identified. An initial turbine layout was developed to take account of all the constraints and their associated buffer zones and the separation distance required between the turbines. Following the mapping of all known constraints, detailed site investigations were carried out by the project team which optimised the decision on the siting of turbines and the carrying out of any development works, such as the construction of roads. Where specific areas were deemed as being unsuitable for the siting of turbines or roads, etc., alternative locations were proposed and assessed, taking into account the areas that were already ruled out of consideration. The turbine layout has also been informed by the results of noise, landscape and visual and shadow flicker assessments as they became available.

The final Proposed Project design takes account of all Site constraints and the distances to be maintained between turbines and other infrastructure from houses, roads, etc. The layout is based on the results of all Site investigations that have been carried out during the EIAR process. As information regarding the Site was compiled and assessed, the Proposed Project design has been revised and amended to take account of the physical constraints of the Site and the requirement for buffer zones and other areas in which no infrastructure could be located. The design process was an iterative process, where findings at each stage of the assessment were used to further refine the design, always with the intention of minimising the potential for environmental impacts.

The development of the final Proposed Project design has resulted following feedback from the various studies and assessments carried out as well as ongoing stakeholder engagement, including negotiations and discussions with landowners.

The findings and conclusions of the EIAR clearly point to the Proposed Project not only being suitable as proposed but also being in line with the requirements of proper planning and sustainable development in that the Site can clearly accommodate a development as proposed without significant adverse impact on the environment.

2.4.4.3 Draft Tipperary County Council Local Authority Climate Action Plan 2024-2029

The Draft Tipperary County Council Local Authority Climate Action Plan 2024-2029[1] (LACAP) highlights the current state of climate action in Ireland, and how Tipperary County Council intends to deliver and enable climate action for a just transition to a low carbon and climate resilient future within County Tipperary. The LACAP will help address the mitigation of greenhouse gases, the implementation

of climate change adaption measures, and will strengthen the alignment between national climate policy and the delivery of effective local climate action.

Overall, the GHG emissions generated from County Tipperary equated to 3,703,400 tCO2eq in the baseline year, 2018. The top three emitting sectors within County Clare in terms of total greenhouse gas emissions in the baseline year were agriculture, residential, and transport, producing 49.9%, 13.7%, and 13.2% of total emissions respectively. Tipperary County Council, along with all public sector entities must reduce greenhouse gas emissions by 51% by 2030 as compared to 2018 in line with the National Climate Action Plan 2023 (Section 11.3.2.6).

The LACAP for Tipperary assesses climate risk relevant to Ireland and to County Tipperary, this, plus the evidence baseline, inform the climate objectives and actions that will be undertaken by Tipperary County Council to assist in the achievement of national and international climate targets.

The TCDP sets out the overall strategy for the proper planning and sustainable development of the County over a 6-year period. The Development Plan includes numerous objectives on sustainability and climate within, as well as a Renewable Strategy.

The commitment by local authorities to monitor, evaluate, and report annually on the implementation of activities contained in the LACAP provides for more reliable and ambitious climate action, and supports national climate ambitions to 2050.

2.4.4.4 Summary of Compliance with Local Policy

In summary, the TCDP acknowledges the importance of renewable energy in reducing anthropogenic greenhouse gas emissions and the contribution of renewable energy in achieving national and EU target net zero greenhouse gas emissions by 2050. The Proposed Project will progress the Development Plan's target of increasing the county's wind energy capacity to 600MW, enabling the county to reach its ambition to become a '*climate resilient, biodiversity-rich, environmentally-sustainable and climate-neutral economy'.*

There are a range of policies in place in the TCDP which strongly support the development and continued supply of renewable energy onto the national grid. Accordingly, the Proposed Wind Farm is consistent with the aims and objectives of the TCDP.

2.4.5 Landscape Character Assessment

Landscape character refers to the distinct and recognisable pattern of elements that occurs consistently in a particular type of landscape, and how people perceive this. It reflects particular combinations of geology, landform, soils, vegetation, land use and human settlement, and creates the particular sense of place found in different areas. Chapter 14 of the EIAR contains a full and detailed landscape and visual impact assessment (LVIA) of the Proposed Project.

2.4.6 Other Relevant Material Considerations

Wind Energy Development Guidelines, 2006

In June 2006, the then Department of Environment, Heritage and Local Government (DoEHLG) published '*Wind Energy Development Guidelines for Planning Authorities'* (2006 WEDGs) under Section 28 of the Planning and Development Act, 2000. The aim of the 2006 WEDGs is to assist the proper planning of wind energy projects in appropriate locations around Ireland. The 2006 WEDGs highlight general considerations in the assessment of all planning applications for wind energy. They set out advice to planning authorities on planning for wind energy through the development plan process and in

determining applications for planning permission. They contain guidelines to ensure consistency of approach throughout the country in the identification of suitable locations for wind energy development.

Each wind energy project has its own characteristics and defining features, and it is therefore impossible to write specifications for universal use. Guidelines should be applied practically and do not replace existing national energy, environmental and planning policy. While the 2006 WEDGs remain the relevant guidelines in place, at the time of lodgement, decision makers (Planning Authorities and An Bord Pleanála) are not bound to their provisions and they can (and do) consider updated standards/requirements/specifications in assessing impacts and the proper planning and sustainable development of the area.

IWEA Best Practice Guidelines for the Irish Wind Energy Industry 2012

The Irish Wind Energy Association (IWEA) (now Wind Energy Ireland) published updated *Wind Energy Best Practice Guidelines* for the Irish Wind Industry in 2012. The guidelines aim to encourage and define best practice development in the wind energy industry, acting as a reference document and guide to the main issues relating to wind energy developments. The purpose of the guidelines is to encourage responsible and sensitive wind energy development, which takes into consideration the concerns of local communities, planners, and other interested groups. The guidelines outline the main aspects of wind energy development with emphasis on responsible and sustainable design and environmental practices, on aspects of development which affect external stakeholders, and on good community engagement practices. In approaching the development of IWEA's guidelines the aim was to be complementary to the 2006 WEDGs.

IWEA Best Practice Principles in Community Engagement and Community Commitment 2013

IWEA extended its guidance with the publication of this Best Practice in Community Engagement and Commitment. IWEA and its members support the provision of financial contributions by wind farm operators to local communities and have sought to formulate best practice principles for the provision of a community commitment. The document sets out IWEA's best practice principles for delivering extended benefits to local communities for wind farm developments of 5 Megawatts (MW) or above. Best Practice Principles of community engagement when planning the engagement strategy and preparing associated literature are also outlined in the document. The aim of these guidelines is to ensure that the views of local communities are taken into account at all stages of a development and that local communities can share in the benefits.

DCCAE Code of Practice for Wind Energy Development in Ireland Guidelines for Community Engagement 2016

In December 2016, the (then) Department of Communications, Climate Action and Environment (DCCAE) issued a Code of Practice for wind energy development in relation to community engagement. The Code of Good Practice is intended to ensure that wind energy development in Ireland is undertaken in adherence with the best industry practices, and with the full engagement of local communities. Community engagement is required through the different stages of a project, from the initial scoping, feasibility and concept stages, right through construction to the operational phase. The methods of engagement should reflect the nature of the project and the potential level of impact that it could have on a community. The guidelines advise that ignoring or poorly managing community concerns can have long-term negative impacts on a community's economic, environmental or social situation. Not involving communities in the project development process has the potential to impose costly time and financial delays for projects or prevent the realisation of projects in their entirety. Community engagement in relation to the Proposed Project is discussed in section 2.7.4.

Department Circular PL5/2017

On the 3rd of August 2017, the (then) Department of Housing, Planning and Local Government issued Circular PL5/2017 to provide an update on the review of the wind energy and renewable policies in development plans, and the advice contained within a previous Departmental Circular PL20-13. Circular PL20-13 advised that local authorities should defer amending their existing Development Plan policies in relation to wind energy and renewable energy generally as part of either the normal cyclical six-yearly review or plan variation processes and should instead operate their existing development plan policies and objectives until the completion of a focused review of the 2006 WEDGs. The new circular (PL05/2017) reconfirms that this continues to be the advice of the Department.

The Circular also sets out the four key aspects of the *preferred draft approach* being developed to address the key aspects of the review of the 2006 WEDGs as follows:

- The application of a more stringent noise limit, consistent with World Health Organisation noise standards, in tandem with a new robust noise monitoring regime, to ensure compliance with noise standards;
- A visual amenity setback of 4 times the turbine height between a wind turbine and the nearest residential property, subject to a mandatory minimum distance of 500 metres between a wind turbine and the nearest residential property;
- The elimination of shadow flicker; and
- The introduction of new obligations in relation to engagement with local communities by wind farm developers along with the provision of community benefit measures.

Commission for Regulation of Utilities: Grid Connection Policy

The Commission for Regulation of Utilities (CRU) (previously the Commission for Energy Regulation (CER)) launched a new grid connection policy in March 2018 for renewable and other generators, known as ECP-1, which seeks to allow "shovel ready" projects that already have a valid planning permission, connect to the electricity networks. The principal objective which guides this decision is to allow those projects to have an opportunity to connect to the network, along with laying the foundations for future, more regular batches for connection. August 2018 saw the applicants for new connection capacity under ECP-1 published. ECP-2 was launched in June of 2020, which set policy for at least three annual batches of connection offers (ECP 2.1, ECP-2.2, and ECP-2.3). On 4th April 2023 the CRU published its Decision on ECP-2.4, confirming a fourth batch under the ECP-2 policy. The first three ECP-2 application windows (2.1 -2.3) opened for the month of September each year. The application window for the fourth annual batch (ECP-2.4) is open from 1st October - 30th November 2023.

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

Draft Revised Wind Energy Development Guidelines 2019

The Department of Housing, Planning and Local Government published the '*Draft Wind Energy Development Guidelines*' in December 2019 (referred to as the 2019 Draft WEDGs'). A consultation process in relation to the 2019 Draft WEDGs concluded on the 19th of February 2020. A further review of the 2019 Draft WEDGs is currently underway by the Department of Housing, Local Government and Heritage (DHLGH) and the Department of Environment, Climate and Communications (DECC) in relation to the noise limits in particular. Since the publication of the 2019 Draft WEDGs, there have been significant changes in national policy regarding renewable energy targets, giving further impetus to the importance of the further review. The 2019 Draft WEDGs set out that that the proper planning and sustainable development of areas and regions must be taken into account when local authorities prepare

their development plans and assess planning applications, irrespective of the significant role renewable energy has to play in tackling climate change.

The 2019 Draft WEDGs note that potential impacts of wind energy development proposals on the landscape, including the natural and built environment, must be considered along with the legitimate concerns of local communities. With this in mind, and in line with the previously stated "*preferred draft approach"*, the 2019 Draft WEDGs primarily focus on addressing a number of key aspects including, but not limited to:

- Acceptable noise thresholds and monitoring frameworks;
- Visual amenity setback;
- Control of shadow flicker;
- Compliance with Community consultation and dividend requirements, as included within the obligatory Community Report; and
- Consideration of the siting, route and design of the proposed grid connection as part of the whole project.

As noted above, the submission period for the 2019 Draft WEDGs closed in February 2020. Under the consultation it was evident that a number of submissions made appeared to have observations surrounding similar points, these include but are not limited to themes such as noise, visual amenity set back and shadow flicker. With regards to noise, a number of the received submissions noted that the provisions put forward in the 2019 Draft WEDGs were unworkable, as such it was considered that should the noise measures be implemented there is the potential for an on-going impact on the development of onshore wind energy in the future. It is noted that the Government has now requested guidance from a group of consultants regarding appropriate noise levels for wind farms, with intentions to revise the noise section of the 2019 Draft WEDGs. In relation to set back distances there was strong criticism with regards to this distance being measured to the curtilage of a property due to this measurement being ambiguous and difficult to implement. Furthermore, questions were raised surrounding the strict measures which have been put in place surrounding shadow flicker, the 2019 Draft WEDGs put forward the provision that '*there will be no shadow flicker at any existing nearby dwelling or other relevant existing affected sensitive property'*. While the overall provision is possible a number of clarifications were sought to ensure that this provision could be implemented in a reasonable manner.

It should be noted that the Proposed Project adheres to the 2006 WEDGs. The primary focus of the 2019 Draft WEDGs related to Noise, Shadow Flicker and setback to sensitive receptors. Noise and Shadow Flicker are entirely controllable and are discussed further in Chapter 12 and Chapter 5, respectively. The 2019 Draft WEDGs recommends a minimum setback of four times the turbine tip height between the proposed turbines and any sensitive property, with a reduced setback of a minimum of 500m for sensitive properties involved in the Proposed Project. The closest non-involved sensitive property is measured at 758m, i.e. greater than the recommended set back distance of 4 times tip height (740m), while the closest involved sensitive property is measured at 620m. i.e. greater than the recommended set back distance for involved sensitive properties. Therefore, the Proposed Project achieves the setback requirements recommended in the 2019 Draft WEDGs also.

On the 21st of December 2022, the Department of the Environment, Climate and Communications published the 'Climate Action Plan 2023' (the CAP) which states that new wind energy guidelines will be drafted in 2023 and finalised in 2024. Notwithstanding this, however, due to the timelines associated with the planning process for renewable energy projects and the commitment within the CAP to publish new draft guidelines in 2023 and final guidelines 2024, it is possible that the new guidelines may be adopted during the consideration period for the current planning application for the Proposed Wind Farm. Without benefit of the final 2024 guidelines, it is considered that since noise emissions and shadow flicker are controllable via inbuilt technologies, the Proposed Wind Farm is capable of compliance with any future guideline limits in this regard. Furthermore, it is considered that 4 times turbine tip height set back from non-involved sensitive properties has become an industry established accepted separation distance for visual amenity.

Renewable Energy Support Scheme

The Climate Action Plan 2023 is the Government's plan to give Irish people a cleaner, safer and more sustainable future to halve emissions by 2030 and reach net zero no later than 2050. The Plan sets out actions across every sector which will ensure we meet our future climate commitments. A key part of the Plan is to increase the proportion of renewable electricity to up to 80% by 2030 and a target of 9GW from onshore wind. These measures will be driven by introduction of the Renewable Electricity Support Scheme ('RESS') which aims to promote the generation of electricity from renewable sources.

The RESS is an auction-based scheme which invites renewable electricity projects to bid for capacity and receive a guaranteed price for the electricity they generate. RESS 1 was the first Renewable Electricity Support Scheme run by the Government of Ireland and concluded in 2020. RESS 2 was run in 2022 and concluded in June 2022. The successful projects in RESS 2 represent a potential increase of nearly 20% in Ireland's current renewable energy generation capacity. They will be delivered between 2023 and 2025. A public consultation was opened in 2022 to refine the Terms and Conditions developed for RESS 2 with a limited and specific set of changes for RESS 3. This consultation closed in December 2022. RESS 3 was ran in 2023 and concluded in September 2023.

The RESS ensures that we are on a pathway to meet our ambitious climate targets and lays the foundations of a thriving and cost-effective renewable electricity market. This will support the growth of the green economy, create sustainable work opportunities, and ultimately benefit the consumer as renewables become more cost effective and increase Ireland's energy security.

2.5 Planning History

A planning history search of all planning applications within the planning application redline boundary, was undertaken. A planning search was carried out online through Tipperary County Council's and the Board's planning portals, however no applications within the planning application redline boundary were identified. The Planning History within 1km of the EIAR Site Boundary and the study areas for each cumulative assessment study areas can be found in **Appendix 2-1** of the EIAR.

2.6 Scoping and Consultations

2.6.1 Scoping

Scoping is the process of determining the content, depth and extent of topics to be covered in the environmental information to be submitted to a competent authority for projects that are subject to an Environmental Impact Assessment (EIA). This process is conducted by contacting the relevant authorities and Non-Governmental Organisations (NGOs) with interest in the specific aspects of the environment with the potential to be affected by the proposal. These organisations are invited to submit comments on the scope of the EIAR and the specific standards of information they require. Comprehensive and timely scoping helps ensure that the EIAR refers to all relevant aspects of a Project and its potential effects on the environment and provides initial feedback in the early stages of the EIAR preparation, when alterations are still easily incorporated into the design. In this way scoping not only informs the content and scope of the EIAR, but it also provides a feedback mechanism for the proposal design itself.

As part of the constraints mapping process, which is detailed in Chapter 3 of this EIAR, telecommunications operators, the Irish Aviation Authority (IAA) and the Department of Defence (DOD) were contacted in May 2022 in order to determine the presence of telecommunications links or aviation assets traversing or located in close proximity to the Site. Following this exercise, a scoping report, providing details of the Proposed Project, was prepared by MKO and circulated to prescribed statutory bodies in October 2022 with follow up scoping taking place between October 2022 and April 2023. The scoping document provided details of the Proposed Project and set out the scope of work for the EIAR. Consultees were invited to contribute to the EIAR by suggesting baseline data, survey techniques and

potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR.

2.6.2 Scoping Responses

Table 2-5 lists the responses received from the bodies to the scoping documents circulated. Copies of all scoping responses received are included in **Appendix 2-2** of this EIAR. If further responses are received, the comments of the consultees will be considered in the construction, operation and decommissioning of the Proposed Project in the event of both planning permissions being granted. The recommendations of the consultees have informed the scope of the assessments undertaken and the contents of the EIAR. Table 2-6 further below presents the key points from the scoping responses and identifies where such points have been addressed in this EIAR.

Table 2-5: Scoping Responses

No.	Consultee	Date of Response
1	2rn (RTÉ Transmission Network Ltd.)	Response received 10/05/2022
2	An Taisce	Response received 28/10/2022
3	Broadcasting Authority of Ireland (BAI)	Response received 09/05/2022
4	Bat Conservation Ireland	Response received 26/04/2023
5	BirdWatch Ireland	Response received 28/10/2022
6	Butterfly Conservation Ireland (BCI)	No response received
7	CIE	Response received 21/11/2022
8	Commission for Regulation of Utilities Water and Energy	No response received
9	Department of Agriculture, Food and the Marine	No response received
10	Department of Communications, Climate Action & Environment	Response received 26/04/2023
11	Department of Defence	Response received 28/10/2022
12	Department of Housing, Local Government and Heritage-Development Applications Unit- NPWS	Response received 26/04/2023
13	Department of Housing, Local Government and Heritage-Development Applications Unit- National Monuments Service	Response received 9/10/2023
14	Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media	No response received
15	Department of Transport	Response received 26/07/2023
16	Eirgrid	No response received
17	Eir	Response received 13/05/2022
18	Enet Telecommunications Networks Limited	Response received 09/05/2022
19	Environmental Protection Agency	No response received
20	ESB Telecoms	No response received
21	Fáilte Ireland	Response received 10.10.2023
22	Geological Survey of Ireland	Response received 01/12/2022
23	Health Service Executive	Response received 15/11/2022
24	Imagine Communications Group	Response received 09/05/2022
25	Inland Fisheries Ireland	Response received 28/10/2022
26	Irish Aviation Authority	Response received 10/06/2022
27	Iarnród Éireann	Response received 10/05/2022

28	Irish Raptor Study Group	No response received
29	Irish Red Grouse Association	No response received
30	Irish Water	Response received 11/01/2023
31	Irish Wildlife Trust	Response received 27/04/2023
32	Tipperary County Council	Response received 26/04/2023
33	Sports Ireland	No response received
34	Sustainable Energy Authority Ireland	No response received
35	The Heritage Council	No response received
36	The Arts Council	No response received
37	Three Ireland	Response received 11/05/2022
34	Transport Infrastructure Ireland	Response received 02/05/2023
35	TG4	No response received
36	Viatel Ireland Ltd	Response received 28/10/2022
37	Virgin Media Ltd	Response received 16/05/2022
38	Vodafone Ireland Ltd.	Response received 10/05/2022
39	Waterways Ireland	Response received 01/11/2022
40	Wireless Connect	Response received 23/06/2022

Table 2-6: Review of Scoping Responses

Consultee	Response Received	Response Summary
2rn (RTÉ Transmission Network Ltd.)	Response received 10/05/2022 24.05.2022	2rn have identified a path between sites at Kilduff and Mt Leinster that passes over the area. They state the path should pass well over the turbines. They have concern that there is a risk of interference to broadcast services in the area and would like to sign a protocol with the developer should the site go ahead. Protocol agreed and signed 05.10.2023, Please see Appendix 15-2 of the EIAR for further details.
An Taisce	Response received 28/10/2022	Unable to respond to every query. If it is a statutory referral to them as per their role as a prescribed body, it will be processed as normal.
Broadcasting Authority of Ireland (BAI)	Response received 09/05/2022	BAI does not have any links of associated equipment in the area.
Bat Conservation Ireland	Response received 26/04/2023	Do not have the capacity to comment nor do they provide opinions or comments on developments.
BirdWatch Ireland	Automatic Reply 28/10/2022	N/A
Butterfly Conservation Ireland (BCI)	No response received	N/A

Consultee	Response Received	Response Summary
CIE	Response received 21/11/2022	Email passed from Iarnród Eireann as they are the owner and operator of the rail line which passes through Templemore. CIE notes a few aspects to be considered from a Civil Engineering and Electrical Engineering point of view and suggests an electromagnetic compatibility assessment report is required to demonstrate that interference will not occur. Guidance provided on behalf of Irish Rail in latest scoping response (14/04/2023) and advised to consult with Irish Rail prior to lodging any application.
Commission for Regulation of Utilities Water and Energy	No response received	N/A
Department of Agriculture, Food and the Marine	No response received	N/A
Department of Communications, Climate Action & Environment	Response received 26/04/2023	The Department does not provide observations for individual planning applications, Environmental Impact Assessments or any notification relating to an individual development.
Department of Defence	Response received 28/10/2022	Acknowledges receipt of email and attached document. The Department will review the request and revert in due course.
Department of Housing, Local Government and Heritage-Development Applications Unit- NPWS	Response received 26/04/2023	The Department is not in the position to make a comment on this referral at this time. The Department may submit observations/ recommendations at a later stage in the process. Meeting arranged as requested by the Board and held over Teams on the 13th of June 2023
Department of Housing, Local Government and Heritage-Development Applications Unit- National Monuments Service	Response received 9/10/2023	Acknowledged receipt of the recent consultation. In the event of observations, a co-ordinated heritage-related response will be received by email from the Development Applications Unit (DAU)
Department of Transport	Response received 26/07/2023	The Department provides matters for consideration in relation to the placement of cables within the extents of the public road network, examination of alternatives and conditions to be applied to when applying for approval
Eirgrid	No response received	N/A

Consultee	Response Received	Response Summary
Eir	Response received 13/05/2022	Eir have identified 3 transmission links within the proposed area that would be at risk. The distance from the max turbine height to the link still exceeds the buffer zone but only marginally, it can be allowed without any risk on said link passing through the area,
Enet Telecommunications Networks Limited	Response received 09/05/2022	Enet have identified on link that passes through the area, clearance should be 'fine' for the identified link.
Environmental Protection Agency	No response received	N/A
ESB Telecoms	No response received	N/A
Fáilte Ireland	Response received 10.10.2023	Issued EIAR Guidelines for the Consideration of Tourism and Related Projects
Geological Survey of Ireland	Response received 01/12/2022	Encourages the use of and reference to GSI datasets which are attached to the response. Also notes that records show no County Geological Sites (CGSs)
Health Service Executive	Response received 15/11/2022	Attached a scoping report for the proposed wind farm with guidance on matters that are recommended to be assessed in the EIAR
Iarnród Éireann	Response received 21.11.2022 Response received 14.11.2023	Requested more information on the proposed grid route. Grid route information provided 22.11.2022 which demonstrates no Irish Rail infrastructure will be interacted with. Response received including recommendations guidelines to consider when constructing the Proposed grid route near Irish Rail Infrastructure.
Imagine Communications Group	Response received 09/05/2022	Imagine have no microwave links affected by the development.
Inland Fisheries Ireland	Automatic Reply 28/10/2022	Meeting requested with IFI on August 8th 2023 and held over teams on August 9th 2023 Meeting held at the Site with IFI on October 4th 2023
Irish Aviation Authority	Response received 10/06/2022	The IAA ANSD require any person who seeks to erect a manmade object to notify the aerodrome operator of intended operation at least thirty days in advance if the structure is to be erected in the vicinity, around and protected surfaces of the aerodrome.

Consultee	Response Received	Response Summary
		Additionally, any person who seeks to erect a manmade object in excess of 45 metres above ground or water surface level must also notify the IAA ANSD of the intended crane erection at least thirty days in advance as a crane operating at or above this height may constitute an obstacle to air navigation. The state also requires data to be supplied once construction is planned or commenced or available to the airspace.
Irish Raptor	No response received	N/A
Irish Water	Response received 11/01/2023 21.06.2023	Irish water does not have the capacity to advise on scoping of individual projects. A list of general aspects to be considered in the scope of the EIA was provided. Irish Water advised that going forward that they (Cillian Claffey from Development Planning) will be the planning lead for the North / West / Southern region and will act as interface for Irish Water on this application. Response received to a data request from Irish Water providing GIS data of Irish Water infrastructure in the area. Request that MKO notify him OR planning@water.ie when once this application has been submitted so that they can receive the referral in adequate time.
Irish Wildlife Trust	Response received 27/04/2023	Do not have the staff capacity to respond to the consultation at the time of response but will endeavour to respond if possible.
The Heritage Council	No response received	N/A
Three Ireland	Response received 11/05/2022	3 Ireland have no microwave transmission links in the area.
Tipperary County Council	Response received 26/04/2023	Response stating email forwarded to another colleague who would respond in due course
Transport Infrastructure Ireland	Response received 02/05/2023	The TII advised, with respect to EIAR scoping issues, their recommendations and general guidance for the preparation of an EIAR, which may affect the national road network. This includes concern for potential impacts the development

Consultee	Response Received	Response Summary
		would have on the national road network and the need for a Traffic and Transport assessment
Viatel Ireland Ltd	Response received 28/10/2022	The development will have no impact.
Virgin Media Ltd	Response received 16/05/2022	Virgin Media Ireland do not have any radio links in the area
Vodafone Ireland Ltd.	Response received 10/05/2022	Vodafone have a live link that runs through the middle of the proposed windfarm, a 30m minimum set back distance from the Fresnel zone for blade tips is required. Stated '*Turbine 4 is a little concerning but there is enough clearance I believe. It is around 160m from direct line of site so it should be fine.*'
Waterways Ireland	Response received 01/11/2022	Not within any zone of influence so no further comments will be made.
Wireless Connect	Response received 23/06/2022	The development will not cause any issues for wireless.

2.7 Other Consultations

2.7.1.1 Tipperary County Council

2.7.1.1.1 *Pre- Planning Meetings*

First Pre-Application Meeting – 10th May 2023.

Members of the project team and the applicant met with representatives from Tipperary County Council (TCC) via MS Teams on the 10th May 2023. Those in attendance were:

- Marion Carey – Tipperary County Council
- Tomas Duffy – Tipperary County Council
- Enda Walsh – Tipperary County Council
- William O'Connor – Buirios Limited
- Niall Galvin – Buirios Limited
- Karen Mulryan – MKO
- John Willoughby – MKO
- Gráinne Griffin – MKO

The project team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- A high-level overview of the Proposed Project and the Site.
- An introduction the applicant.
- Overview of relevant planning policy including compliance with local wind energy policy.
- Set out the Site Constraints Analysis undertaken.
- Provided specific details of the scheme relating to LVIA, Ecology and the proposed grid and haul routes.
- Set out the scope of the Environmental Impact Assessment Report to be undertaken.
- Set out details relating to scoping, pre-application & public consultation undertaken to date.
- Discussed the Strategic Infrastructure Development criteria set in the 7th Schedule of the Act.
- Provide an overview of the contents of the EIAR.
- Set out the projected project timelines.

Matters discussed included:

- Representatives from TCC noted that the Council have a standard centralised policy for all large grid connections and recommended issuing the proposed layout with information on the grid connection to the roads department.
- TCC representatives noted that Templemore town is a key area to be considered and that primary and secondary regional roads and upland viewpoints are also important and should be considered in terms of viewpoints.
- TCC noted that the area is subject to historic flooding.
- Representatives of TCC noted that any local roads which are proposed as haul roads are subject to a PSCI survey, so they do note deteriorate during construction. The impact on the haul route during construction would need to be assessed.
- TCC noted that there are a number of nearby wind farms in the area that should be considered in the cumulative assessment.
- TCC noted the proposed use of existing unauthorised development does not form part of the proposed design. If there is unauthorised development the applicant may need to apply for retention prior to lodgement.

Second Pre Application Meeting – 13th July 2023

A 2nd meeting was held between members of the project team and the applicant with representatives from TCC Roads Department via MS Teams on the13th July 2023. Those in attendance were:

- Tomas Duffy – Tipperary County Council
- Tommy Deely – Tipperary County Council
- Alan Lipscombe – Alan Lipscombe Traffic and Transport Consultants
- William O'Connor – Buirios Limited
- Niall Galvin – Buirios Limited
- Karen Mulryan – MKO
- John Willoughby – MKO
- Ronan Dunne - MKO
- Gráinne Griffin – MKO

The project team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- A high-level overview of the Proposed Project and the Site.
- An introduction the applicant.
- Provided background on Pre-Application Consultations taken place to date with Tipperary County Council and the Board.
- Set out the proposed project design including the proposed haul route, the proposed grid connection and proposed site entrances off the local road, including the length of on road and off-road sections.
- Provided an overview of the underground cable construction methodology.
- Set out the scope of the Traffic and Transport Assessment to be carried out as part of the EIAR.
- Set out detailing relating to scoping undertaken to date with specific regard to Transport Infrastructure Ireland and the Department of Transport.
- Set out the projected project timelines.

Matters discussed included:

- Impact on bridges.
- Alternative grid connection routes
- Bridge and watercourse crossings
- Construction Access
- Traffic Management
- Condition assessments, strengthening and reinstatement of local roads
- Sightlines
- Transport delivery route.

Onsite Meeting – 19th October 2023

A meeting was held onsite with the Community Liaison Officer (CLO) James Crowley and Council Engineer Enda Walsh on the 19th October 2023 to discuss the proposed Project access locations and proposed underground grid connection cable route. The CLO sought to meet with TII regarding the Proposed Project design; however, an email response was received on the 6th of December 2023 stating that TII do not consult with third parties and recommended consultation with the local planning authority instead.

2.7.2 An Bord Pleanála

Section 37B Consultation

The applicant engaged with An Bord Pleanála (the Board) under the provisions of Section 37B of the Planning and Development Act 2000 (as amended), as to whether the Proposed Wind Farm would meet the thresholds of the Seventh Schedule of the Planning and Development Act, 2000, as amended. The applicant opened consultations with the Board in February 2023 in relation to a Proposed Project of approximately 9 no. wind turbines and all associated works including the provision of a 110kV connection to the national grid at Borrisbeg, Adjacent Townlands, Co. Tipperary. A Strategic Infrastructure Development (SID) meeting under the provisions of Section 37B was held with the Board on the 4th May 2023. Those in attendance were:

- Paul Caprini – An Bord Pleanála
- Pauline Fitzpatrick – An Bord Pleanála
- Niamh Thornton – An Bord Pleanála
- Ashling Doherty – An Bord Pleanála
- Ellen Moss – An Bord Pleanála
- William O'Connor – Buirios Limited
- Niall Galvin - Buirios Limited
- John Willoughby – MKO
- Karen Mulryan – MKO
- Ronan Dunne - MKO
- Gráinne Griffin – MKO

The project team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- A high-level overview of the Proposed Project and the Site.
- An introduction the applicant.
- Overview of relevant planning policy including compliance with local wind energy policy.
- Set out the Site Constraints Analysis undertaken.
- Provided specific details of the scheme relating to LVIA, Ecology and the proposed grid route.
- Set out the scope of the Environmental Impact Assessment Report to be undertaken.
- Set out details relating to scoping, pre-application & public consultation undertaken to date.
- Discussed the Strategic Infrastructure Development criteria set in the 7th Schedule of the Act.
- Set out the projected project timelines.

Items discussed:

- The Board's representatives asked for clarity regarding the output of each turbine and overall output of the windfarm. It was clarified by the applicant that the Maximum Export Capacity of the Proposed Wind Farm was anticipated to have an output in excess of 50 MW and would therefore constitute Strategic Infrastructure Development.
- The Board's representatives advised that cumulative impacts must be robustly assessed.
- Regarding photomontage viewpoints, the Board's representatives advised the applicant to cover viewpoints from Offaly, Kilkenny and Laois due to the proximity of borders, with cumulative impacts in mind in particular.
- The applicant clarified that the nearest house is over 600m from the site and is involved in the project. The nearest house not involved in the project is at least 750m from the site.
- The Board advised that a robust hydrological assessment must be undertaken.
- The applicant confirmed that it had scoped the development with NPWS and IFI but had not had any more detailed consultation with them. The Board's representatives emphasised the need for the applicant to consult as closely as possible with the NPWS

- The Board's representatives advised that in the event that a number of turbine options are being applied for, all options must be assessed.
- The Board's representatives advised that consideration of an offshore development be addressed in the alternatives section of the EIAR.
- In response to a query on the matter, the applicant clarified that the connection to the substation will most likely be loop-in-loop-out as opposed to tail-fed and also clarified the underground cable connection from the windfarm to the existing 110kV line will be 1.3km in length.
- Regarding the haul route the applicant advised that they had scoped the project with TII and that it does not envisage road improvement works along the N62, although it is still assessing this. The Board's representatives advised that the applicant consult with TII if works are required.
- The Board's representatives advised that borrow pits must be fully assessed to include any cumulative impacts that may arise during the construction phase, should they be proposed.

The applicant closed consultation with the Board under Section 37E of the Planning and Development Act 2000, as amended on the 21st August 2023. On the 19th of October 2023, the Board wrote to the applicant and confirmed that consultation was closed and that the Proposed Wind Farm was considered to be strategic infrastructure within the meaning of Section 37A and such any application for approval of the Proposed Wind Farm should be made directly to the Board.

Section 182E

The applicant also engaged with the Board under the provisions of Section 182E of the Planning and Development Act 2000 (as amended), as to whether the Proposed Grid Connection element of the Proposed Project would be considered Strategic Infrastructure Development (SID).

An SID meeting under the provisions of Section 182E was held with the Board on 6th July 2023. Those in attendance were:

- Paul Caprani – An Bord Pleanála
- Liam Bowe – An Bord Pleanála
- Barbara White – An Bord Pleanála
- Karen Mulryan – MKO
- John Willoughby – MKO
- Ronan Dunne – MKO
- Grainne Griffin – MKO
- William O'Connor – Buirios Limited
- Niall Galvin – Buirios Limited

The team gave an overview of the Proposed Grid Connection in the form of a PowerPoint presentation of which the following items were discussed:

- A high-level overview of the Proposed Grid Connection and the Site.
- An introduction the applicant.
- Set out the proposed grid connection and substation design and provided details of the proposed 110kV end masts.
- Provided specific details relating to watercourse crossings.
- Set out the scope of the Environmental Impact Assessment Report to be undertaken.
- Set out details relating to scoping, pre-application & public consultation undertaken to date.
- Discussed the Strategic Infrastructure Development criteria set in the 7th Schedule of the Act.
- Set out the projected project timelines.

Following the presentation further discussion included the following items:

- The Board's representatives advised the cumulative impact assessment must be comprehensive and noted that the case may fall within the scope of section of 182A of the Act, however it is for

the Board to decide if the application meets the criteria, not the planning inspector in this instance.

- It was noted that the proposed substation and steel towers will need to be included in the cumulative visual impact assessment.
- The Board's representatives discussed the possibility of constructing the underground cable along the west road as an alternative route.
- The Board's representatives noted households and two working farms along the road where construction is being proposed and suggested that these households be included in the upcoming public consultation.
- The Board's representatives noted the layout of the EIAR Table of Contents and suggested that the chapter in relation to 'Vulnerability to Major Accident and Natural Disasters' might be placed before the 'Interaction of the Foregoing' chapter so as it can be assessed within 'Interaction of the Foregoing'.
- The Board's representatives sought confirmation from the applicant that there would be no instream works and, therefore, no potential for water pollution in either of the streams.

The applicant closed consultation with the Board under Section 182E of the Planning and Development Act 2000, as amended on the 10th October 2023.

2.7.3 Other Meetings

2.7.3.1.1 *National Parks and Wildlife Service*

Upon recommendation by the Board, a meeting was requested and subsequently held with the National Parks and Wildlife Service on the 13th of June 2023 over Teams. In attendance were:

- Brian Duffy NPWS
- Aran von der Geest Moroney MKO
- Laura McEntegart MKO
- Susan Doyle MKO
- Roisin Towe MKO
- Karen Mulryan – MKO
- Grainne Griffin – MKO
- William O'Connor – Buirios Limited
- Niall Galvin – Buirios Limited

Items discussed:

- Site Location & Project Design
- Study Site baseline, survey effort and findings to date
  - Mammal survey effort
  - Botanical survey effort
  - Bat survey effort
  - Aquatic Survey effort
  - Bird survey effort
  - Habitat survey effort
- Main ecological considerations

It was noted by the MKO ecologists that the river water quality at the Site was poor and the NPWS representative welcomed any enhancement proposals to counteract this.

2.7.3.1.2 *Inland Fisheries Ireland*

Upon recommendation by An Bord Pleanála, a meeting was requested and subsequently held with the Inland Fisheries Ireland (IFI) on the 9th of August 2023 over Teams. In attendance were:

- Oliver McGrath IFI
- Thomas Blackwell MKO
- Aran von der Geest Moroney MKO
- Karen Mulryan – MKO
- Grainne Griffin – MKO
- William O'Connor – Buirios Limited
- Niall Galvin – Buirios Limited

Items discussed:

> Site Location & Project Design
> Study Site baseline, survey effort and findings to date, particularly the Aquatic Survey findings
> River Restoration Proposal: MKO ecologists along with the applicant have designed a proposal to restore a segment of the Eastwood River which currently lacks good quality in-stream or riparian habitat. It is proposed to restore appropriate pattern, profile and dimension to the channel with a view to improving stability of the channel and restoring in stream habitat. It is also proposed to establish a natural wooded riparian buffer and to exclude livestock from accessing the restored channel. Please see **Appendix 6-4 Biodiversity Management and Enhancement Plan** for details.

The IFI representative welcomed the proposal and noted it has not been offered by similar projects before and highlighted the local benefit this would have on aquatic habitats and species, water quality and general biodiversity in the area. It was agreed at the meeting that the IFI representative would meet with MKO at the Site to discuss the proposal on the ground and to facilitate further discussion/ideals. This onsite meeting was held on the 4th of October 2023 where the IFI representative expressed his approval of the proposal acknowledging the innovation of the proposal and benefit it will have for local alluvial habitats and terrestrial and aquatic biodiversity.

2.7.4 Community Consultation

The applicant has engaged with the local community with regards the Proposed Project. **Appendix 2-3** of this EIAR contains a full and detailed community report. In summary, the report was prepared to record the consultation carried out with the local community in respect of the Proposed Project. The applicant has carried out consultation in relation to the Proposed Project with local residents and interested parties in the wider community. The objective of the consultations was to ensure that the views and concerns of all were considered as part of the Proposed Project design and Environmental Impact Assessment (EIA) process.

The Proposed Project has the potential to have significant benefits for the local economy, by means of job creation, landowner payments and commercial rate payments. An important part of any renewable energy development, which Buiríos Limited has been at the forefront of developing, is its Community Benefit Fund. The concept of directing benefits from wind farms to the local community is promoted by the National Economic and Social Council (NESC) and the Wind Energy Ireland (WEI) among others. While it may be simpler and easier to put a total fund aside for a wider community area, the applicant. is endeavouring to develop new ways to direct increased gain towards the local community with particular focus on those living closest to the Proposed Project.

The 2006 WEDGs state that:

"While it is not a mandatory requirement, it is strongly recommended that developers of a wind energy project should engage in active consultation and dialogue with the local community at an early stage in the planning process, ideally prior to submitting a planning application".

This was further addressed in the Preferred Draft Approach to Wind Energy Development in Ireland (June 2017) which stated the following with respect to planning applications for wind farms:

> *"Planning applications must contain a Community Report prepared by the applicant which will specify how the final proposal reflects community consultation. The Community Report must also outline steps taken to ensure that the proposed development will be of enduring economic benefit to the communities concerned".*

The 2019 Draft WEDGs have retained this position stating the following:

> *"In order to promote the observance of best practice, planning authorities should require applicants to prepare and submit a Community Report with their planning application and a condition on any subsequent planning permission should require developers to carry out the development in accordance with the approved Community Report".*

The report in **Appendix 2-3** outlines the consultation and community engagement initiatives undertaken by the applicant prior to the submission of the planning application. It also outlines the main issues identified during this process, how the final proposal reflects community consultation and the steps taken to ensure that the Proposed Project will be of enduring economic benefit to the communities concerned.

The Proposed Project will benefit the surrounding communities, through the community benefit fund for residents and community groups, employment during the construction and operation of the Proposed Project, payments to involved landowners and through the annual rates payable to the local authority.

2.8 Cumulative Impact Assessment

The EIA Directive and associated guidance documents state that as well as considering any direct, indirect, secondary, transboundary, short-, medium-, and long-term, permanent and temporary, positive and negative effects of the project the description of likely significant effects should include an assessment of cumulative impacts that may arise. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to the project. The factors to be considered in relation to cumulative effects include population and human health, biodiversity, land, soil, water, air, climate, material assets, landscape, vulnerability to/from accidents & natural disasters and cultural heritage as well as the interactions between these factors.

To gather a comprehensive view of cumulative impacts on these environmental considerations and to inform the EIAR process being undertaken by the consenting authority, each relevant chapter within this EIAR includes a cumulative impact assessment where appropriate.

The potential for cumulative impacts arising from other projects has therefore been fully considered within this EIAR.

2.8.1 Methodology for the Cumulative Assessment of Projects

The potential cumulative impact of the Proposed Project and combined with the potential impact of other projects and/or plans has been carried out with the purpose of identifying what influence the Proposed Project will have on the environment when considered collectively with approved and existing projects and projects pending a decision from the planning authority and land-uses in the defined cumulative assessment study areas as set out in Table 2-7 below.

The cumulative impact assessment of projects and/or plans has three principle aims:

- To establish the range and nature of existing and approved projects and/or plans within the cumulative impact study area of the Proposed Project.
- To summarise the relevant projects and/or plans which have a potential to create cumulative impacts.
- To identify the projects and/or plans that hold the potential for cumulative interaction within the context of the Proposed Project and discard projects that will neither directly or indirectly contribute to cumulative impacts.

Assessment material for this cumulative impact assessment was compiled on the relevant project and/or plans within the defined cumulative assessment study areas. The material was gathered through a search of relevant online Planning Registers, reviews of relevant EIAR (or historical EIS) documents, planning application details and planning drawings, and served to identify past and future projects, their activities and their environmental impacts.

2.8.2 Cumulative Study Area

Table 2-7 below details the cumulative assessment study areas which are considered in this EIAR.

Table 2-7 Cumulative Study Area for each EIAR chapter

Individual Topic	Study Area	Rationale
Population & Human Health (including shadow flicker)	District Electoral Divisions of the Proposed Project Site. 1.63 km for Shadow Flicker	The Study Area for Population is identified in Section 5.2.1 in Chapter 5 as the District Electoral Divisions where the Proposed Project Site is located. The Wind Energy Development Guidelines for Planning Authorities 2006 state that at distances greater than 10 rotor diameters from a turbine, the potential for shadow flicker is very low.
Biodiversity	Suir Sub Catchment	The Site is located within the Suir_SC_010 Catchment. To capture other projects within the same hydrological sub catchments of the Site.
Biodiversity - Bats	10km	A 10km buffer of the EIAR Study Area Boundary is used as is recommended for the desktop study and cumulative assessment by NatureScot Guidelines 2021 (Section 4).
Ornithology	25km	A 25km radius from the Site equates to the average size of a county in Ireland. This radius will therefore allow for a cumulative impact assessment for bird populations identified to be important at a county level at the Site. Site surveys have found that there were no nationally important species discovered at the site.
Land, Soils and Geology	EIAR Study Boundary	The geological cumulative study area will be contained within the EIAR Study boundary due to the localised nature of the proposed construction works. There is no potential for significant cumulative effects with regard to soils and geology outside of the EIAR Study boundary.

Individual Topic	Study Area	Rationale
Hydrology & Hydrogeology	Suir Sub Catchment	The Site is located within the Suir_SC_010 Catchment. To capture other projects within the same hydrological sub catchments of the Site.
Air & Climate – Dust	0.5 km	Given dust particles do not generally travel greater than 500m from source (Guidance on the Assessment of Mineral Dust Impacts for Planning, IAQM 2016) the geographical boundary for the cumulative dust impact is 500m.
Air Quality	1 km	In line with the TII Publication Air Quality Assessment of Proposed National Roads – Standard PE-ENV-01107, December 2022, a geographical boundary of 1km was used for cumulative air quality assessment
Climate	National	The Climate assessment has considered the cumulative effects of the Proposed Project with other developments on a national basis.
Noise and Vibration	35 dB LA90 noise contour area.	For the Construction phase, given the distances between the main construction works onsite and nearby noise sensitive locations, and the fact that the various infrastructure elements of the construction phase are temporary to short term in nature, the combination of the various noise sources will not be excessively intrusive at any single noise-sensitive location. Furthermore, the application of binding noise limits and hours of operation, along with implementation of appropriate noise and vibration control measures, will ensure that noise and vibration effect is kept within the guidance limits. Therefore, considering the distance to any other projects and the noise emissions associated with these activities, cumulative construction noise or vibration effects are unlikely. For the operational phase, the study area should cover at a minimum the area predicted to exceed 35 dB LA90 from all existing and proposed wind turbines. An appraisal of the wider study area identified that the nearest other wind turbine development (existing, permitted and proposed) is located approximately 7.9 km from the Proposed Wind Farm. At this distance there is no potential for cumulative turbine noise impacts and in accordance with best practice guidance discussed in **Section 12.3.2.2** of the EIAR**,** other wind farms have not been included in the operational noise assessment. **Appendix 12-5** of the EIAR shows the relevant noise contours maps and identifies the 35 dB LA90 noise contour area.

Individual Topic	Study Area	Rationale
Archaeological, Architectural and Cultural Heritage	20 km EIAR Study Boundary	20km for UNESCO sites, if applicable. 10km for National Monuments and 5km for recorded monuments, NIAH and RPS structures. EIAR Study Boundary for potential direct effects.
Landscape & Visual	20 km for other wind farms 15km for Landscape Character Area	For blade tips in excess of 100m, a Zone of Theoretical Visibility radius of 20km would be adequate (this is twice conventional thresholds and reflects greater visibility of higher structures), as noted in Appendix 3 of the Wind Energy Development Guidelines 2006.
Material Assets: Traffic & Transport	Turbine Component and construction materials delivery routes - 20km	Informed by traffic modelling scenario and the area of influence the Proposed Project has on changing traffic volumes. The potential cumulative traffic effects with the Proposed Project are assessed on the following criteria; • Project status (proposed to operational) • Degree of overlap with the Proposed Project delivery highway network (low to high) • Traffic volumes (low to high) The geographical boundary for the traffic & transport cumulative assessment is defined by the potential for other projects to overlap with the Proposed Project delivery highway network, and so a 20km buffer is deemed appropriate to capture other plans and projects with the potential for cumulative effects with the Proposed Project.
Material Assets: Utilities, telecoms	EIAR Study Boundary	Impacts on utilities/telecoms links that are located within or pass through the EIAR Study Boundary.
Material Assets: Aviation Material Assets:	10km	Licenced aerodromes within 10km The geographical boundary for the aviation cumulative assessment is defined by the potential for other wind farm projects to interfere with aviation activity and broadcast signals that interact with the Proposed Project. Previous correspondence from the Irish Aviation Authority (IAA) referenced aerodromes within 10km for consideration. As detailed in Table 2-6 above, reference to aviation infrastructure or study areas was not provided by the IAA in their scoping response for this subject application. Therefore, as a precautionary

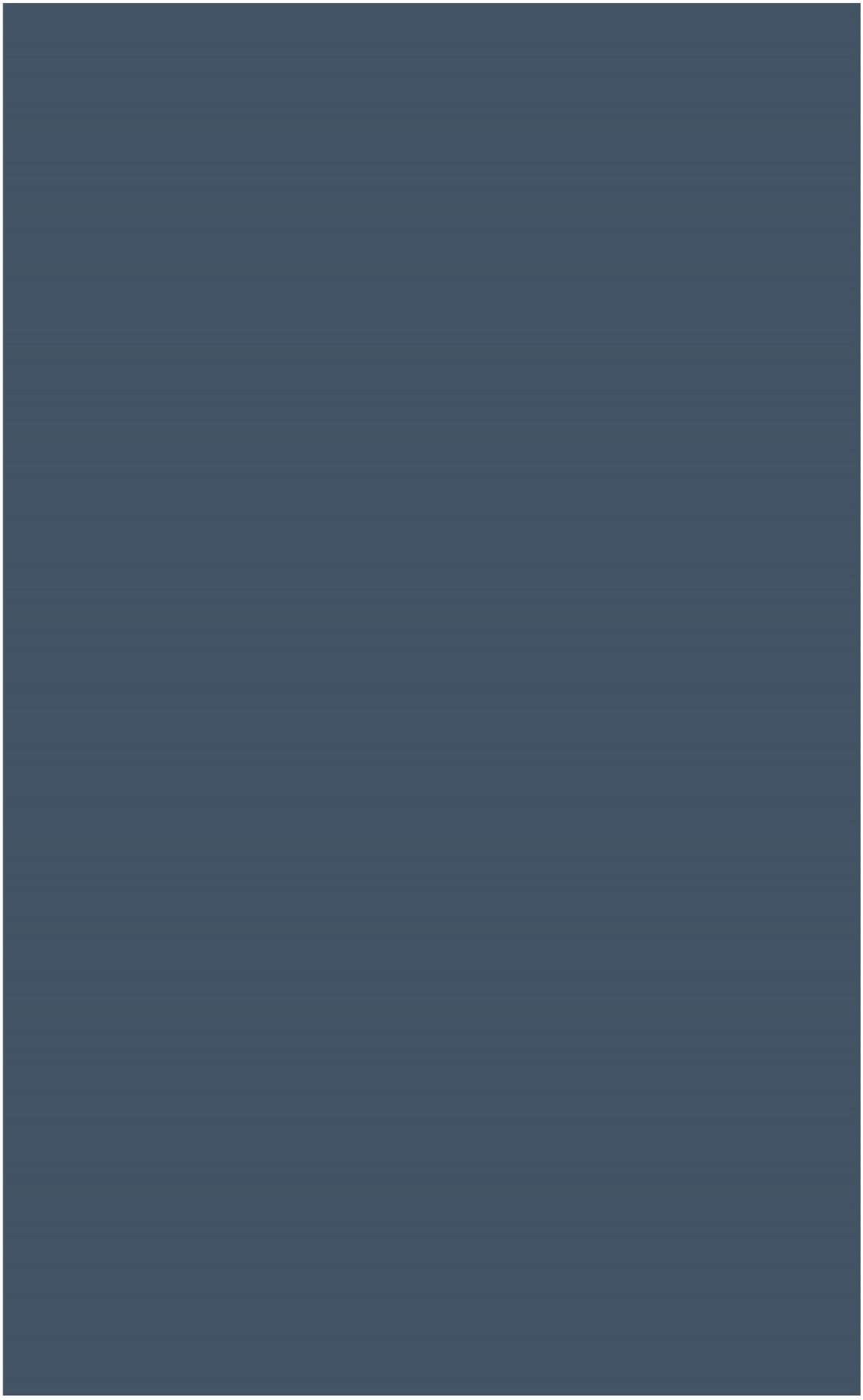
Individual Topic	Study Area	Rationale
		measure, a 10km study area was considered for the Proposed Project also.
Waste Management	20km	Licenced Waste Management Facilities out to 20km that may be used to dispose of hazardous materials generated during the construction, operation and decommissioning phases.

To gather a comprehensive view of cumulative impacts within the cumulative study area and to inform the EIA process being undertaken by the consenting authority, each relevant chapter within the EIAR addresses the potential for cumulative effects where appropriate and within the context of their identified cumulative study area. A long list of all applications considered by each of the different disciplines in their cumulative impact assessment are included in **Appendix 2-1**.

2.8.2.1 Summary

The cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider all potential significant cumulative effects arising from relevant projects and/or plans and land uses within the cumulative study area and within the vicinity of the Proposed Project. Assessment material for this cumulative impact assessment was compiled on the relevant project and/or plans within the defined cumulative assessment study areas. The material was gathered through a search of relevant online Planning Registers, reviews of relevant EIAR (or historical EIS) documents, planning application details and planning drawings, and served to identify past and future projects, their activities and their environmental impacts. These include ongoing agricultural practices. Each relevant chapter within the EIAR addresses the potential for cumulative effects where appropriate and within the context of their identified cumulative study area. A long list of all applications considered by each of the different disciplines in their cumulative impact assessment are included in **Appendix 2-1**.

Overall, the Proposed Project has been designed to mitigate impacts on the environment and particularly water, and a suite of mitigation measures is set out within the EIAR. Additional detail in relation to the potential significant cumulative effects arising and, where appropriate, the specific suite of relevant mitigation measures proposed are set out within each of the relevant chapters of this EIAR.



APPENDIX 2.1

PROJECTS CONSIDERED IN THE EIA CUMULATIVE ASSESSMENT

APPENDIX 2.2

COPIES OF THE EIA SCOPING RESPONSES

APPENDIX 2.3

COMMUNITY REPORT