1. INTRODUCTION

1.1 Introduction

This Environmental Impact Assessment Report (EIAR) has been prepared by MKO on behalf of Laurclavagh Ltd, who intends to apply to An Bord Pleanála for planning permission to construct a renewable energy development which will comprise of 8 wind turbines and associated infrastructure, in the townland of Laurclavagh and adjacent townlands, near Tuam, and an onsite 110kV substation and associated works, including underground 110kV cabling to connect to the national grid at Cloon 110kV substation, in the townland of Cloonascragh, Co. Galway.

Due to the nature of the proposed renewable energy development, which will have a potential generating capacity of greater than 50 megawatts (MW) and requires the provision of 110 kV infrastructure which will form part of the national electricity transmission network, two separate planning applications are required.

The Proposed Project will comprise 8 no. wind turbines with a tip height of 185 metres (m) and will have an estimated installed capacity of 56MW. The Proposed Wind Farm meets the threshold for Strategic Infrastructure Development (SID) as set out in the Seventh Schedule of the Planning and Development Act 2000, as amended, being 'An installation for the harnessing of wind power for energy production (a wind farm) with more than 25 turbines or having a total output greater than 50 megawatts') and is therefore being submitted directly to An Bord Pleanála as a Strategic Infrastructure Development in accordance with Section 37E of the Planning and Development Act 2000, as amended. This approach has been confirmed following consultations with the Board under the provisions of Section 37B of the Planning and Development Act 2000 as amended (case reference ABP-315469-23). This EIAR accompanies the planning application for the proposed 8 No. wind turbines and associated infrastructure submitted to the Board. The planning application is accompanied by this EIAR and a Natura Impact Statement (NIS). The Proposed Grid Connection 110kV infrastructure and associated works will be subject to a separate planning application under Section 182A of the Planning and Development Act 2000, as amended, however, it is assessed in this EIAR. A close out letter has been issued to the Board following consultations under the provisions of Section 182E of the Planning and Development Act 2000 as amended (Case Reference ABP-317625-23).

1.1.1 References to Proposed Project

The Proposed Project, which will be known as the 'Laurclavagh Renewable Energy Development' is being brought forward in response to local, national, regional and European policy regarding Ireland's transition to a low-carbon economy, associated climate change policy objectives and to reduce Ireland's dependence on imported fossil fuels for the production of electricity.

For the purposes of this EIAR:

- > The 'Proposed Wind Farm' relates to the 8 no. turbines and supporting infrastructure (detailed description provided in Chapter 4 of this EIAR), and it is the subject of this planning application under Section 37E of the Planning and Development Act 2000, as amended.
- The 'Proposed Grid Connection' relates to the on-site 110kV substation and temporary construction compound and underground cabling connection to the existing Cloon 110kV Substation. The Proposed Grid Connection will facilitate the connection of the Proposed Wind Farm to the national electricity grid and will be subject of a separate planning application under Section 182A of the Planning and Development Act 2000, as amended.



The 'Proposed Project' for the purposes of this EIAR comprises the Proposed Wind Farm and the Proposed Grid Connection, all of which are located within the EIAR Study Boundary (the 'Site') measuring approximately 944 hectares.

This EIAR, along with a Natura Impact Statement ('NIS'), will accompany the planning permission application for the Proposed Wind Farm which will be made to An Bord Pleanála in accordance with the provisions of 37E of the Planning and Development Act 2000, as amended. Both the EIAR and NIS contain the information necessary for An Bord Pleanála to complete the Appropriate Assessment and Environmental Impact Assessment as required for this planning permission application.

The Proposed Grid Connection is an integral part of the Proposed Project and is assessed in this EIAR, however, it will be subject to a separate planning permission application. The planning permission application for the Proposed Grid Connection will be made to An Bord Pleanála in accordance with the provisions of 182A of the Planning and Development Act 2000, as amended.

Both the EIAR and NIS take into account the combined impacts of these individual elements of the Proposed Project.

For clarity in this EIAR, all elements of the Proposed Project will be assessed cumulatively and in combination with other plans and projects to aid the competent authority in carrying out an EIA.

The EIAR Site Boundary identifies the primary EIAR study area for the Proposed Project, however, each individual topic, i.e. chapter, has its own study area for assessment purposes relevant to that topic which will be clearly identified in the relevant chapters. The actual site outline (Red Line Boundary) for the purposes of this planning permission application occupies a smaller area within the primary EIAR Site Boundary. The EIAR Site Boundary encompasses an area of approximately 944 hectares. The permanent footprint of the Proposed Project measures approximately 13.8 hectares, which represents approximately 1.46% of the Site.

The Proposed Project is described in detail in Chapter 4 of this EIAR.

1.1.2 **Proposed Project Site Location**

The Proposed Project is located within a rural setting in northwest Galway, approximately 8km southwest of Tuam and 10km north of Claregalway. The N83 National Road runs in a north-south direction directly to the east of the Proposed Wind Farm site. Land use currently comprises a mix pastural agricultural land and smaller areas of scrub and exposed rock. The surrounding land use is primarily pastural agricultural lands, as well as one-off rural housing. Existing access is via the N83 onto the L61461 Local Road in a westerly direction, a temporary road between the N83 and the L61461 will facilitate construction stage access to the Proposed Wind Farm site. The site location context is shown on Figure 1-1. The EIAR Site Boundary is shown overlain on aerial imagery in Figure 1-2.

It is intended to connect the Proposed Wind Farm to the national grid via a 110kV underground grid connection cable from the proposed onsite 110kV substation and the existing Cloon 110kV electrical substation in the townland of Cloonascragh, Co. Galway. The Proposed Grid Connection underground cabling will be approximately 14.3km in length and will be primarily located within the public road network.

The townlands in which the Proposed Project is located are listed in Table 1-1 below. *Table 1-1 Townlands related to the Proposed Project*

| Proposed Project Element | Townlands in Co. Galway |
|--------------------------|---|
| Proposed Wind Farm | Ballynacreg North, Bunnahevelly More, Cahermorris, Cluidrevagh, Kilcurriv Eighter, Kilcurrivard, Laurclavagh, Pollacossaun Eighter, Pollacossaun Oughter, |



| Proposed Project Element | Townlands in Co. Galway |
|--------------------------|---|
| | |
| Proposed Grid Connection | Ballynacreg North, Carheenshowagh, Claretuam, Clogh South, Cloonascragh, Cloonmore, Cloontooa, Common, Culleen, Cummer, Glennafosha, Kilcurrivard, Laurclavagh, Pollacossaun Eighter, Pollacossaun Oughter, Rusheens North, Rusheens South. |







1.2 Legislative Context of Environmental Impact Assessment

The consolidated European Union Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment (the 'EIA Directive'), has been transposed into Irish planning legislation by the Planning and Development Act 2000 as amended and the Planning and Development Regulations 2001 as amended. Directive 2011/92/EU was amended by Directive 2014/52/EU which has been transposed into Irish law with the recent European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018). Most of the provisions of the new regulations came into operation on the 1st of September 2018 with a number of other provisions coming into operation on the 1st of January 2019.

This EIAR complies with the EIA Directive 2011/92/EU as amended by Directive 2014/52/EU.

The Environmental Impact Assessment (EIA) will be undertaken by An Bord Pleanála, as the competent authority.

Article 5 of the EIA Directive 2011/92/EU as amended by Directive 2014/52/EU provides where an EIA is required, the developer shall prepare and submit an environmental impact assessment report (EIAR). The information to be provided by the developer shall include at least:

- *a) a description of the project comprising information on the site, design, size and other relevant features of the project;*
- b) a description of the likely significant effects of the project on the environment;
- *c)* a description of the features of the project and/or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;
- *d)* a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment;
- e) a non-technical summary of the information referred to in points (a) to (d); and
- f) any additional information specified in Annex IV relevant to the specific characteristics of a particular project or type of project and to the environmental features likely to be affected.

In addition, Article 94 of the Planning and Development Regulations 2001 (as amended) sets out the information to be contained in an EIAR, with which this EIAR complies.

MKO was appointed as environmental consultant on the Proposed Project and commissioned to prepare this EIAR in accordance with the requirements of the EIA Directive 2011/92/EU as amended by Directive 2014/52/EU.

Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended, identifies classes and scales of development that require Environmental Impact Assessment (EIA). The relevant class of development in this case relates to "*installations for the harnessing of wind power for energy production (wind farms) with more than 5 turbines or having a total output greater than 5 megawatts*", as per Item 3(i) of the Schedule. The Proposed Project exceeds 5 Megawatts in scale and proposes more than 5 turbines, and therefore is subject to EIA.

The EIAR provides information on the receiving environment and assesses the likely significant effects of the Proposed Project on it and proposes mitigation measures to avoid or reduce these effects. The function of the EIAR is to provide information to allow the competent authority to conduct the EIA of the Proposed Project.



All elements of the Proposed Project, i.e. the Proposed Wind Farm site and Proposed Grid Connection have been assessed as part of this EIAR.

1.2.1 **EIAR Guidance**

The Environmental Protection Agency (EPA) published its *'Guidelines on the Information to be Contained in Environmental Impact Assessment Reports'* in May 2022, which is intended to guide practitioners preparing an EIAR in line with the requirements set out in the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018).

In preparing this EIAR regard has also been taken of the provisions of the '*Guidelines for Planning Authorities and An Bord Pleanála on Carrying out Environmental Impact Assessment*', published by the Department of Housing, Planning and Local Government (DHPLG) in August 2018 to the extent these guidelines are relevant having regard to the enactment of the revised EIA Directive.

The European Commission also published a number of guidance documents in December 2017 in relation to Environmental Impact Assessment of Projects (Directive 2011/92/EU as amended by 2014/52/EU) including '*Guidance on Screening*', '*Guidance on Scoping*' and '*Guidance on the preparation of the Environmental Impact Assessment Report*'. MKO has prepared the EIAR in accordance with these guidelines also.

1.2.2 Wind Energy Development Guidelines for Planning Authorities

The relevant considerations under the '*Wind Energy Development Guidelines for Planning Authorities*' (Department of the Environment, Heritage and Local Government (DOEHLG), 2006) have been taken into account during the preparation of this EIAR.

The '*Wind Energy Development Guidelines for Planning Authorities*' (DoEHLG, 2006) (hereafter referred to as the Guidelines) were the subject of a targeted review. The proposed changes to the assessment of impacts associated with onshore wind energy developments were outlined in the document Draft Wind Energy Development Guidelines (December 2019) (hereafter referred to as the draft Guidelines). A consultation process in relation to the draft Guidelines closed on 19th February 2020. The proposed changes presented in the draft Guidelines give certain focus on the setback distance from sensitive receptors (four times the proposed maximum tip height), along with shadow flicker and noise requirements relative to sensitive receptors.

At time of writing, the draft Guidelines have not yet been adopted, and the relevant guidelines for the purposes of section 28 of the Planning and Development Act 2000, as amended, remain to be the Guidelines. Notwithstanding this, however, due to the timelines associated with the planning process for renewable energy projects and the commitment within the Climate Action Plan 2023 to publish new draft guidelines in 2023 and final new guidelines in 2024 (refer to Section 1.5.1.1 below), it is possible that the draft Guidelines may be adopted during the consideration period for the current planning application. Should the draft Guidelines be adopted in advance of a planning decision being made on this application, the Proposed Wind Farm site will be capable of achieving the requirements of the draft Guidelines as currently proposed. The distance from proposed turbines to third party sensitive receptors will achieve the proposed 4 times turbine tip height and any revised noise and shadow flicker requirements can be achieved by implementing mitigation through use of the turbine control systems where necessary.

1.3 **The Applicant**

The applicant for the Proposed Project, Laurclavagh Ltd, is an associated company of Enerco Energy Ltd., which is an Irish-owned, Cork based company with extensive experience in the design,



construction and operation of wind energy developments throughout Ireland, with projects currently operating in or in construction in Counties Cork, Kerry, Limerick, Clare, Galway, Mayo and Donegal.

By the end of 2023, Enerco and its associated companies had over 850 Megawatts (MW) of wind generating capacity under construction or in commercial operation, with a further 400MW of projects at various stages in its portfolio to assist in meeting Ireland's renewable energy targets.

Brief Description of the Proposed Project

The Proposed Project will comprise the construction of 8 No. wind turbines with a blade tip height of 185 metres and all associated works, and an onsite 110 kV substation and associated works, including underground 110kV cabling to connect to the national grid at Cloon 110kV substation. The full description of the Proposed Project is detailed in Chapter 4 of this EIAR.

The current planning application, relating to the Proposed Wind Farm site, is being made to An Bord Pleanála under Section 37E of the Planning and Development Act, 2000, as amended.

The development description for the current planning application as appears in the public notices is as follows:

| i. | 8 no. wind turbines with an overall turbine tip height of 185 metres; a rotor blade |
|-----|--|
| | diameter of 163 metres; and hub height of 103.5 metres, and associated foundations, |
| | hard-standing and assembly areas; |
| ii. | A thirty-year operational life of the wind farm from the date of full commissioning of |
| | the wind farm and subsequent decommissioning; |

- *iii.* Underground electrical cabling (33kV) and communications cabling;
- *iv.* A temporary construction compound;
- v. A temporary security cabin;
- *vi.* A meteorological mast with a height of 30 metres and associated foundation and hardstanding area;
- vii. A new gated site entrance on the L61461;
- *viii.* Junction accommodation works and a new temporary access road off the N83 to the L61461, to facilitate turbine delivery and construction access to the site;
- *ix.* Upgrade of existing site tracks/roads and provision of new site access roads, junctions and hardstand areas.
- x. Upgrade of the existing L61461;
- xi. Spoil Management;
- *xii.* Site Drainage;
- xiii. Tree and hedgerow removal;
- *xiv.* Biodiversity Enhancement measures (including the planting of natural woodland, hedgerows and species rich grassland for new habitat);
- xv. Operational stage site signage; and
- xvi. All ancillary works and apparatus.

The application is seeking a ten-year planning permission.

The Proposed Grid Connection, which will be subject to a separate planning application, includes for an onsite 110kV substation compound (2 no. control buildings with welfare facilities, all associated electrical plant and apparatus, security fencing, underground cabling, waste water holding tank, site drainage and all ancillary works), a temporary construction compound and approximately 14.3km of underground 110kV electrical cabling connecting the proposed onsite 110kV substation to the existing Cloon 110kV substation, near Tuam, Co. Galway.



Current and future wind turbine generator technology will ensure that the wind turbine model, chosen for the Proposed Project, will have an operational lifespan greater than the 30-year operational life that is being sought as part of the planning application.

Modern wind turbine generators currently have a typical generating capacity in the 4 to 7 MW range, with the generating capacity continuing to evolve upwards as technology improvements are achieved by the turbine manufacturers. For the purposes of this EIAR it is assumed that the wind turbine model installed as part of the Proposed Project will have an output of 7MW. Therefore, on this basis, the proposed 8 no. wind turbines would have a combined generating capacity of 56MW. The actual turbine procured as part of a competitive tender process may have a power output that is marginally lower or greater than the 7MW turbine described in the EIAR. Irrespective of the power output of the actual turbine procured, the conclusions of the EIAR will not be materially affected.

The layout of the Proposed Project has been led by consideration of constraints and facilitators, thereby avoiding the environmentally sensitive parts of the Site. The roads layout for the Proposed Wind Farm site makes the use of the existing onsite access roads and tracks where possible, with approximately 1.5 kilometres of existing roadway/ tracks requiring upgrading and approximately 6.4 kilometres of new access road to be constructed.

There are 80 no. sensitive receptors located within 1 kilometre of the proposed turbine locations, with 9 of these sensitive receptors belonging to the landowners who are participating in the Proposed Project. The closest inhabitable property to the proposed turbines is H1, which is located approx. 767m from T6.

All elements of the Proposed Project, including the Proposed Wind Farm and Proposed Grid Connection have been assessed as part of this EIAR.

Need for the Proposed Project

1.5.1 **Overview**

MKO

In July 2021, the Climate Action and Low Carbon Development (Amendment) Act 2021 was signed into law, committing Ireland to reach a legally binding target of net-zero emissions no later than 2050, and a cut of 51% by 2030 (compared to 2018 levels). On this pathway to decarbonisation, the Government published the Climate Action Plan 2024¹ reaffirming the renewable electricity target of 80% by 2030, without compromising security of energy supply. The Proposed Project is expected to be operational before 2030 and would therefore contribute to this 2030 target.

In July 2023, the EPA² report stated a provisional total of national greenhouse gas emissions in 2022 to be 60.76 million tonnes carbon dioxide equivalent (MtCO₂eq) which is 1.9% lower (or 1.19 Mt CO₂eq) than emissions in 2021 (61.95 MtCO₂eq) and follows a 5.1% increase in emissions reported for 2021. Emissions are 0.5% lower than pre-pandemic 2019 figures. In 2022, the energy industries, transport and agriculture sectors accounted for 74.1% of total GHG emissions. Agriculture is the single largest contributor to the overall emissions, at 38.4%. Transport, energy industries and the residential sector are the next largest contributors, at 19.1%, 16.6% and 10.0%, respectively. The report also states that there was a substantial reduction in coal, oil and peat used in electricity generation (-16%, -29% and -25% respectively), and renewables increased from 35% in 2021 to 39% in 2022. The report highlights that whilst emissions are beginning to reduce, transformative measures will be needed to meet National Climate ambitions.

As such, the Proposed Project is critical to helping Ireland address these challenges as well as addressing the country's over-dependence on imported fossil fuels.

The need for the Proposed Project is driven by the following factors:

- 1. A legal commitment from Ireland to limit greenhouse gas emissions under the Kyoto protocol to reduce global warming;
- 2. A requirement to increase Ireland's national energy security as set out in Ireland's Transition to a Low Carbon Energy Future 2015-2030.
- 3. Climate Action Plan 2023 which aims to ensure that Ireland achieves its legally binding target (the Climate Action and Low Carbon Development (Amendment) Act 2021) of net-zero greenhouse gas emissions no later than 2050, and a reduction of 51% by 2030.
- 4. Increasing energy price stability in Ireland through reducing an over reliance on imported fossil fuels.
- 5. Provision of cost-effective power production for Ireland which would deliver local benefits; and
- 6. To facilitate the Government in meeting its ambitious 80% renewable energy target by 2030.

These factors are addressed in further detail below. Section 2.1 in Chapter 2 of this EIAR on Background to the Proposed Project, presents a full description of the international and national renewable energy policy context for the Proposed Project. Section 2.2 addresses climate change, including Ireland's current status with regard to meeting greenhouse gas emission reduction targets.

¹ Department of Environment, Climate and Communications (2023) Climate Action Plan 2024

² Ireland's Provisional Greenhouse Gas Emissions (1990-2022) <<u>https://www.epa.ie/publications/monitoring-assessment/climate-change/air-emissions/2023-EPA-Provisional-GHG-Report Final v3.pdf</u>>





1.5.1.1 Climate Change and Greenhouse Gas Emissions

At the Paris climate conference (COP21) in December 2015, 195 countries adopted the first-ever universal, legally binding global climate deal. The agreement sets out a global action plan to avoid dangerous climate change by limiting global warming to well below 2°C above pre-industrial levels. Under the agreement, Governments also agreed on the need for global emissions to peak as soon as possible, recognising that this will take longer for developing countries and to undertake rapid reductions thereafter in accordance with the best available science. The most recent climate conference (COP28) in December 2023 in Dubai resulted in the first agreement explicitly calling for the transition away from fossil fuels, the United Arab Emirates (UAE) Consensus. This text raised concerns over the achievement of limiting warming below 1.5°C, as the text to 'phase out as soon as possible inefficient fossil fuel subsidies' does not address energy poverty or the just transition. The UAE Consensus further calls for more explicit near-term goals in the lead up to 2050, calling for the world to cut greenhouse gas emissions by 43% as compared to 2019 levels.

The International Panel on Climate Change (IPCC) put forward its clear assessment in their Fifth Assessment Report³, that the window for action on climate change is rapidly closing and that renewable energy sources such as wind will have to grow from 30% of global electricity at present to 80% by 2050 if we are to limit global warming to below 2 degrees and in accordance with the COP 21 agreement to limit global warming to well below 2°C above pre-industrial levels. Former Minister Kelly remarked in 2015 that "As a nation we must do everything in our power to curb our emissions".

In February 2022, the International Panel on Climate Change (IPCC) released the report 'Working Group II-Climate Change 2022: Impacts, Adaptation and Vulnerability' regarding the impacts of climate change on nature and human activity. The report states that global warming of 1.5 °C and 2 °C will be exceeded during the 21st century unless deep reductions in CO2 and other greenhouse gas emissions occur in the coming decades. the report identifies four key risks for Europe with most becoming more severe at 2 °C global warming levels (GWL) compared with 1.5 °C GWL. From 3 °C GWL, severe risks remain for many sectors in Europe. The four key risks identified are:

- > Key Risk 1: Mortality and morbidity of people and changes in ecosystems due to heat.
- > Key Risk 2: Heat and drought stress on crops.
- > Key Risk 3: Water scarcity.
- Key Risk 4: Flooding and sea level rise

In April 2022, the IPCC released the report 'Working Group-III – Climate Change 2022: Mitigation of Climate Change, which assesses literature on the scientific, technological, environmental, economic, and social aspects of mitigation of climate change. The report reflects new findings in the relevant literature and builds on previous IPCC reports, including the WGIII contribution to the IPCC's Fifth Assessment Report (AR5), the WGI and WGII contributions to AR6 and the three Special Reports⁴ in the Sixth Assessment cycle. This report outlines developments in emission reduction and mitigation efforts, assessing the impact of national climate pledges in relation to long-term emissions goals in a global context.; and states that '*Unless there are immediate and deep emissions reductions across all sectors, limiting global warming to* 1.5 °C will be beyond reach.'

 $^{^{\}scriptscriptstyle 3}\operatorname{IPCC}$ Fifth Assessment Synthesis Report, Intergovernmental Panel on Climate Change AR5 Report

⁴ The three Special Reports are: Global Warming of 1.5°C: an IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty (2018); Climate Change and Land: an IPCC Special Report on climate change, desertification, land degradation, sustainable land management, food security, and greenhouse gas fluxes in terrestrial ecosystems (2019); IPCC Special Report on the Ocean and Cryosphere in a Changing Climate (2019)



In November 2023, the IPCC published the '*AR6 Synthesis Report: Climate Change 2023*⁵, and is the final product of the AR6 of the IPCC. It summarizes the state of knowledge of climate change, its widespread impacts and risks, and climate change mitigation and adaptation. It confirms that the unsustainable and unequal energy and land use as well as historical use of fossil fuels have unequivocally caused global warming, with global temperatures approximately 1.1°C above 1850-1900 levels. A substantial 'emissions gap' exists between global greenhouse gas emissions in 2030 associated with the implementation of NDCs announced prior to COP26, Parties to the Paris Agreement have two years to submit updated NDCs for the period up to 2035, ambition will need to be ratchetted up in order to limit warming to 1.5°C.

In June 2023, the EPA⁶ reported, for the 2021 year, that the energy sector contributed to 17% of Ireland's total emissions. Under a With Existing Measures (WEM) scenario, emissions from the energy industries sector are projected to decrease by 50% from 10.3 to 5.2 MtCO₂eq; under a With Additional Measures (WAM) scenario, emissions from the energy sector are projected to decrease by 60% from 10.3 to 4.2 MtCO₂eq over the period 2021-2030.

The EPA '*Ireland's Provisional Greenhouse Gas Emissions 1990-2022*' report stated that in 2022, overall electricity generation in Ireland increased by a 2.1% and renewable electricity generation increased from 35.0% in 2021 to 38.6%, mainly due to an increase in wind energy production of 14.6%. The increase in renewables, combined with decreases in coal, oil, and peat use, resulted in the emissions intensity of power generation in 2022 decreasing by 4.8%, 331 g CO2/kWh compared with 348 g CO2/kWh in 2021.

The 'National Energy Projections 2023^{π}, published annually by the Sustainable Energy Authority of Ireland (SEAI), state that in 2022, 86% of all energy used in Ireland was from fossil fuels, 13% from renewable sources and the remainder from others such as waste and electricity imports. By 2030, fossil fuels could still provide most of Ireland's energy, ranging from 68% in the WEM scenario to 57% in the most ambitious WAM scenario. The deployment of renewables needs to outpace the growth of energy demand for the absolute reductions in greenhouse gas emissions that are required to be met. However, the SEAI National Energy Projections show that by the end of the second budget period, the total exceedance in the electricity sector is projected to be 20.1 MtCO₂eq, or 33%, and 13.8MtCO₂eq, or 23%, in the WEM and WAM scenarios, respectively.

It is estimated that the Proposed Project will have a generating capacity of 56MW. On this basis, the Proposed Project will result in the net displacement of approximately 50,822 tonnes of carbon dioxide (CO₂) per annum, including accounting for back-up generation. The carbon offsets resulting from the Proposed Project are described in detail in Section 11.5 of Chapter 11 of this EIAR.

1.5.2 Energy Security

At a national level, Ireland currently has one of the highest external dependencies on imported sources. In November 2023 the Department of the Environment, Climate and Communications (DECC) released '*Energy Security in Ireland to 2030*⁸ which states that 'Irelands future energy will be secure by moving from an oil-, peat-, coal, and gas-based energy system to an electricity-led system, maximising our renewable energy potential flexibility and being integrated in Europe's energy systems. This report proposes a package of a wide range of measures to implement to 2030 to improve Irelands energy security. Ireland is currently one of the most energy import dependent countries in the EU, having

⁵ IPCC Sixth Assessment Synthesis Report, Intergovernmental Panel on Climate Change AR6 Report: Climate Change 2023 ⁶ Ireland's Greenhouse Gas Emission Projections 2022-2040 <<u>https://www.epa.ie/publications/monitoring-assessment/climate-change/air-emissions/EPA-GHG-Projections-2022-2040_Finalv2.pdf</u>

⁷ SEAI National Energy Projections 2023 Report. <<u>https://www.seai.ie/publications/National-Energy-Projections-2023.pdf</u>>

⁸ Department of the Environment, Climate and Communications (2023) Energy Security in Ireland to 2030.



imported 77% of its energy supply in 2021 and 82% in 2022.⁹ The '*Energy Security in Ireland to 2030*' provides a roadmap to energy security in Ireland, on the basis of current energy policies and project and to implement the measures proposed as part of the energy security package.

EirGrid in their '*All Island Generation Capacity Statement 2022 - 2031*' (October 2022), states that new wind farms commissioned in Ireland in 2021 brought total wind installed capacity to over 4,300MW, contributing to the overall RES-E percentage of 36.4% with wind energy accounting for 32.5%. Prior to 2015, Irelands import dependency of energy was over 90% but dropped to 71% in 2016 with the Corrib gas field starting production. Since 2018, Ireland's import dependency has been increasing as the output from the Corrib gas field reduces faster than we are adding new renewable sources.

In January 2024 the SEAI published their '*Energy in Ireland 2023 Report*¹⁰, stating that in 2022, 49.2% of the electricity generated indigenously in Ireland came from gas, with renewables accounting for a further 38.9%. Coal, oil, non-renewable wastes (NRW), and peat accounted for the remainder of electricity generation in Ireland. The overall renewable energy share for gross final energy consumption for 2022 was 13.1%. 2022 had the lowest energy-related emissions of any year in the last quarter century, except for 2020 which was heavily influence by the COVID-19 lockdowns. The SEAI Energy in Ireland 2023 report, using early provisional data from January to September 2023, states that electricity emissions may be significantly reduced from 2022 levels in 2023 and the carbon intensity of the national grid may be down to 259 gCO2/kWh, which, if achieved, will be the lowest carbon intensity value ever reached in Ireland.

Ireland continues to be hugely energy import-dependent leaving it exposed to large energy price fluctuations as a minimum and possibility of fuel shortages if a major energy crisis were to occur. The international fossil fuel market is growing increasingly expensive and is increasingly affected by international politics which can add to price fluctuations. This volatility will be increased as carbon prices increase in the future. This has implications for every Irish citizen.

The SEAI has stated that our heavy dependence on imported fossil fuels, "is a lost opportunity in terms of keeping this money here in Ireland and further developing our abundant renewable resources"¹¹.

The cost of carbon credits is included in all electricity traded, and the price of electricity generated by coal is particularly vulnerable due to its high carbon emissions per unit of electricity generated. Coal and peat generate almost 5% of Ireland's electricity, while gas generates 51%, but the Climate Action Plan calls for an aggregate reduction in carbon dioxide emissions in the electricity sector of 62-81% (compared to 2018 levels) by 2050. Any steps to reduce this dependence on imported fossil fuels will add to financial autonomy and stability in Ireland. The use of Ireland's indigenous energy resources, such as wind, will contribute to a reduction in energy imports.

The Energy White Paper 2015^{12} notes "There will be a substantial increase in the cost of carbon in the short and medium term, through the EU Emissions Trading Scheme". Any steps to reduce dependence on imported fossil fuels will add to financial autonomy and stability in Ireland. As the White Paper notes:

"In the longer term, fossil fuels will be largely replaced by renewable sources".

⁹ Sustainable Energy Authority of Ireland (2023) Key insights from SEAIs 2022 National Energy Balance.

<https://www.seai.ie/data-and-insights/seai-statistics/key-publications/national-energy-balance/Key-Insights-from-2022-National-Energy-Balance.pdf>

¹⁰ Sustainable Energy Authority Ireland (2024) Energy in Ireland – 2023 Report

¹¹ Dr Eimear Cotter, Head of Low Carbon Technologies, SEAI - "Energy Security in Ireland 2015"

¹² Ireland's Transition to a Low Carbon Energy Future 2015-2030 (Department of Communications, Energy & Natural Resources, 2015)



1.5.2.1 **REPowerEU**

In a Communication from the European Parliament on Joint European Action for more affordable, secure and sustainable energy¹³, the European Commission proposed an outline of a plan to make Europe independent from Russian fossil fuels well before 2030 in light of Russia's invasion of Ukraine. Commission President Ursula von der Leyen stated:

"We must become independent from Russian oil, coal and gas. We simply cannot rely on a supplier who explicitly threatens us. We need to act now to mitigate the impact of rising energy prices, diversify our gas supply for next winter and accelerate the clean energy transition. The quicker we switch to renewables and hydrogen, combined with more energy efficiency, the quicker we will be truly independent and master our energy system.".

In May 2022, the EU published the REPowerEU Plan¹⁴ in light of Russia's invasion of Ukraine in February 2022. The core purpose of the plan, in addition to accelerating the EU's transition from the use of fossil fuel to renewable energy sources, is to end the dependence on Russian fossil fuels.

In April 2022, the Government published the National Energy Security Framework (NESF) providing a single overarching and initial response to address Ireland's energy security needs in the context of the war in Ukraine. This framework mirrors that of the EU, in which accelerating Ireland's transition from the use of fossil fuel to renewable energy sources is a key objective.

1.5.3 **Competitiveness of Wind Energy**

While Ireland has a range of renewable resources, as the White Paper states "[Onshore Wind] *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*".

In fact, the cost of support is more than offset by the fact that adding large quantities of wind to the wholesale market drives down auction prices in any half hour trading period when the wind is blowing, i.e. for 80% of the hours of the year. Wind has a capacity factor of approx. 35%, which is its average output throughout the year relative to its maximum output. However, wind is generating power at some level for 80% of the hours of the year. A Pöyry study from 2015 showed that reaching our targets in 2020 would reduce wholesale prices by more than costs of new grid infrastructure, backup and the subsidies paid to wind, resulting in a net saving of €43m per year in 2020. The EU has noted that Ireland has one of the lowest costs of supporting renewables mainly because onshore wind is on a par with the cost of power from conventional generation when a full cost-benefit analysis is undertaken.

1.5.3.1 EU 2020 Renewable Energy Targets

The burning of fossil fuels for energy creates greenhouse gases, which contribute significantly to climate change. These and other emissions also create acid rain and air pollution. Sources of renewable energy that are utilised locally with minimal impact on the environment are necessary to meet the challenges of the future. The EU adopted the Renewable Energy Directive (2018/2001 EU) on the Promotion of the Use of Energy from Renewable Sources in December 2018 which sets EU 2030 Renewable Energy Targets.

The Directive sets a legally binding mandatory national target for the overall share of energy from renewable sources for each Member State. This package is designed to achieve the EU's overall

¹³ European Commission (March 2022) REPowerEU: Joint European Action for more affordable, secure and sustainable energy. Strasbourg. <u>https://ec.europa.eu/commission/presscorner/detail/en/ip_22_1511</u>

¹⁴ https://ec.europa.eu/commission/presscorner/detail/en/IP_22_3131



20:20:20 environmental target, which consists of a 20% reduction in greenhouse gases, a 20% share of renewable energy in the EU's total energy consumption and a 20% increase in energy efficiency by 2020. To ensure that the mandatory national targets are achieved, Member States must follow an indicative trajectory towards the achievement of their target as outlined in Ireland's National Renewable Energy Action Plan (NREAP).

The first Renewable Energy Directive (RED)¹⁵ is legislation that influenced the growth of renewable energy in the EU and Ireland for the decade ending in 2020. From 2021, RED was replaced by the second Renewable Energy Directive (REDII),¹⁶ which continues to promote the growth of renewable energy out to 2030. Ireland's mandatory national target for 2020 was to supply 16% of its overall energy needs from renewable sources. This target covered energy in the form of electricity (RES-E), heat (RES-H) and transport fuels (RES-T). Ireland fell just short of this target with total GFC reaching 13.5%. 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 Plan (NECP) 2021-2030, Ireland's overall RES target is 34.1% in 2030.

Under RED, the RES-E target was for 40% of gross electricity consumption to come from renewable sources in 2020 The actual RES-E achieved in 2020 by Ireland was 39.1%, falling just short of the national target. Under REDII, Ireland's National Energy and Climate Plan 2021-2030 included a planned RES-E of 70% in 2030, which has been replaced by the 80% by 2030 RES-E target as detailed in the more recent Climate Action Plan (2024), which will ensure that renewable electricity continues to form the backbone of Irish renewable energy use for the coming decade and beyond.

1.5.3.2 EU 2030 Renewable Energy Targets

The Climate Action and Low Carbon Development (Amendment) Act 2021 commits Ireland to reach a legally binding target of net-zero emissions no later than 2050, and a cut of 51% by 2030 (compared to 2018 levels). Under the 2021 Act, Ireland's national climate objective requires the state to pursue and achieve, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy.

Ireland's statutory national climate objective and 2030 targets are aligned with Ireland's obligations under the Paris Agreement and with the European Union's objective to reduce GHG emissions by at least 55% by 2030, compared to 1990 levels and to achieve climate neutrality in the European Union by 2050.

Given the need to ratchet up the EUs clean energy transition, RED was revised in 2023, and the amending Directive EU/2023/2413 (REDIII)¹⁷ entered into force on 20 November 2023. REDIII amended the EY-wide overall 2030 RES target from 32% to at least 42.5%, and it is assumed that Irelands 2030 RES target will increase accordingly.

In December 2023, the Government published the most recent Climate Action Plan 2024, announcing a renewable electricity target of 80% by 2030 for Ireland. This is in line with targets previously announced in the Climate Action Plan 2021 and 2023.

The Climate Action Plan 2024 states that in order to meet the required level of emissions reduction by 2030 and the 80% renewable electricity generation target by 2030, the installed generation capacity of onshore will need to reach 9GW and at least 5GW of offshore wind. Irelands installed capacity for wind

¹⁵ Directive 2009/28/EC on the promotion of the use of energy from renewable sources. Available from: <u>https://eur-lex.europa.eu/legalcontent/EN/ALL/?uri=celex%3A32009L0028</u>

¹⁶ Directive (EU) 2018/2001 on the promotion of the use of energy from renewable resources (recast). Available from: https://eurlex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32018L2001

¹⁷ Directive (EU) 2023/2413 amending Directive (EU) 2018/2001, Regulation (EU) 2018/1999 and Directive 98/70/EC as regards the promotion of energy from renewable sources and repealing Council Directive (EU) 2015/652. Available from: <u>https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202302413</u>



generation at the end of 2022 was 4.54GW¹⁸. The SEAI provides a provisional estimate of installed wind energy capacity in 2023 based on EirGrid data to the end of August and ESBN data to the end of September; the provisional value of installed wind capacity in Ireland is 4.5GW.¹⁹ As noted previously, Ireland missed it's 2020 renewable energy target of 40% with a renewable share in electricity of 39.1%, and by the end of 2021, Irelands renewable energy share for electricity generation was 32.5%. With a renewable share of electricity generation at 80% in mind and a target of 9GW installed onshore wind by 2030, it is now more critical than ever that we continue to progress renewable energy development in Ireland so that we are successful in meeting our 2030 targets. Further detail on the EU 2030 targets is noted in Chapter 2.

1.5.4 Increasing Energy Consumption

As detailed above, the Climate Action Plan 2024 identifies a need for 9GW of onshore wind generation in order for Ireland to meet its 2030 targets. In their '*All Island Generation Capacity Statement 2022 - 2031*' (October 2022), EirGrid estimate that installed capacity of wind generation is set to increase to at least 12 GW between onshore and offshore capacity as Ireland endeavours to meet its renewable targets in 2030 and beyond.

Failure to meet Ireland's targets for renewable energy will result in substantial EU sanctions. The Department of Public Expenditure and Reform (DPER) in their report 'Future Expenditure Risks associated with Climate Change/Climate Finance'²⁰ concluded that *'potential costs of purchasing non-ETS GHG compliance for the Irish Exchequer for the 2020 to 2030 period could have a cumulative total in the billions in the absence of any further policy changes'.* If Ireland decided to backfill shortfalls in the RES-H target with additional renewable electricity this could significantly reduce these costs.

In April 2016²¹ the SEAI estimated the historic build rate for wind energy deployment as 180 MW per year since 2005. If this average build rate over the remaining period between 2018 and 2020 is assumed, then approximately 3.85 GW of wind would be built up to 2020. The SEAI has provided a provisional estimate of wind capacity in Ireland in 2023 to be 4.59GW.²²

It is noted that the key driver for electricity demand in Ireland for the next number of years is the connection of new large energy users, such as data centres. This statement notes that '*Large industrial connections normally do not dominate a country's energy demand forecast but this is the case for Ireland at the moment*'. EirGrid analysis shows that demand from data centres could account for 28% of all demand by 2031 in a median demand scenario (accounts for the connection of all 1400MVA of potential demand in the connection process). The median demand scenario is now higher than for last year's forecast for high demand, indicating the progression of many of the data centre projects.

In 2015, IWEA commissioned a study '*Data Centre Implications for Energy Use in Ireland*' which concluded that an extra approx. 1 Gigawatt (GW) of electricity demand could materialise between 2015 and 2020 due to growth in data centres. More recently, data available from Bitpower²³ at the end of 2020 noted that there are currently 66 operational data centres in Ireland, totalling 834MW; with an additional 778MW having received planning approval and 295MW under construction. The increase in growth of data centres means an increase in electricity demand, with many of the proposed data centres committing to using 100% renewable energy which will result in an increased demand for renewable electricity as detailed above.

In the context of increasing energy demand and prices, uncertainty in energy supply and the effects of climate change, our ability to harness renewable energy such as wind power plays a critical role in

²² Sustainable Energy Authority of Ireland (2024) Energy in Ireland – 2023 Report

¹⁸ Sustainable Energy Authority of Ireland (2024) Energy in Ireland – 2023 Report ¹⁹ Ibid.

²⁰ https://igees.gov.ie/wp-content/uploads/2013/10/Future-Expenditure-Risks-associated-with-Climate-Change-Climate-Finance1.pdf
²¹ <u>https://www.seai.ie/publications/Ireland____s-Energy-Targets-Progress-Ambition-and-Impacts.pdf</u>

²³ http://www.bitpower.ie/images/Reports/2020_H2_Report.pdf



creating a sustainable future. The Department of the Environment, Climate and Communications have set a target for Ireland of 80% of total electricity consumption to come from renewable resources by 2030, this target forms part of the Government's strategy to make the green economy a core component of its economic recovery plan for Ireland. It is envisaged that wind energy will provide the largest source of renewable energy in achieving this target, with a target of 9GW onshore wind installed generation capacity and a target of 5GW offshore wind installed generation capacity.

The Department of Communications, Energy & Natural Resources (DCENR) noted in their Draft Bioenergy Plan 2014, that achieving the anticipated renewable energy usage in the three energy sectors will be challenging, with the 12% for renewable heat being particularly so. SEAI estimate that the shortfall could be in the region of 2% to 4% of the 12% RES-H target. Given that individual member states 2030 targets are set at a more challenging level than 2020, fines could persist for an extended number of years, and so the total cost to Ireland could run to billions. For comparison, the entire wholesale electricity market has an annual value of around €3bn.

In the medium-term, with the introduction of electric vehicles and uptake of smart demand such as storage heating and heat pumps, emissions in the heat and transport sector will be substantially reduced. A high renewables electricity system is the foundation of such a transformation.

The White Paper published by DCENR in December 2015 expanded on the vision set out above. It outlines a radical transition to a low carbon future which will involve amongst other things, 'generating' our electricity from renewable sources of which we have a plentiful indigenous supply' and 'Increasing' our use of electricity and biogas to heat our homes and fuel our transport'.

The DCENR confirmed in the publication of the White Paper '*Ireland's Transition to a Low Carbon Future' 2015 – 2030*, that wind is the cheapest form of renewable energy:

"(Onshore wind) 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."

EU countries have agreed on a new 2030 Framework for climate and energy, including EU-wide targets and policy objectives for the period between 2020 and 2030. These targets aim to help the EU achieve a more competitive, secure and sustainable energy system and to meet its long-term 2050 greenhouse gas reductions target. It is noted that a binding EU target of 32% for renewable energy by 2030 has been set by the EU 2030 Framework for Climate and Energy, with Ireland confirming its own targets for 2030 as detailed below.

Ireland will therefore have to meet even more demanding climate change and renewable energy supply obligations in order to play its part in achieving the European climate and energy ambitions. As announced in December 2022, the Irish Government have pledged to generate 80% of the country's electricity supply from renewable sources by 2030. The development of additional indigenous wind energy generating capacity, such as the Proposed Project, will not only help to reduce carbon emissions but will also improve Ireland's security of energy supply. Such penetration levels of wind are technically and economically feasible once paired with other energy system changes such as increasing electric vehicle penetration and electrification of heat. Further information on the 2030 commitments for Ireland are noted in Chapter 2, Section 2.2.

These sources of 'flexible demand' allow the system to match intermittent renewable energy resources with minimal extra cost. Additional interconnection is also planned with the UK and France, further assisting in the integration of wind (and in the future solar) on the power system.

A number of alternative energy types have been examined when considering how best to meet this renewable energy target.



In 2014, a report prepared by UK consultant BW Energy for the Rethink Pylons campaign group has suggested that converting Moneypoint generation station (which runs solely on coal) from coal to biomass would have enabled Ireland to meet 2020 renewable energy targets. Dr Brian Motherway, Chief Executive SEAI²⁴ refutes this claim. While Dr Motherway agrees that biomass offers benefits and is helping Ireland to move away from fossil fuels, he states that "*the conversion of Moneypoint to biomass has been considered a number of times over the years, including actual trials of small amounts of biomass in the station. However, the technical and economic challenges have proven far greater than some would have us believe*".

The reason being that the move of Moneypoint from coal to biomass would not entail a clean swap. In fact, 'to allow for combustion of biomass, a full redesign and rebuild of much of the station would be required'. In the UK where this has been done, energy generation stations have required significant financial support to make the process viable and with each unit of energy in the UK being worth approx. 13 cents, almost double that of Ireland which is approx. 7 cents, wind energy works out cheaper in Ireland. Also, the amount of biomass required to feed Moneypoint would require 300,000ha of land; an equivalent area of Counties Wexford and Carlow being planted with willow which is far more than Ireland currently produces which means we would need to import.

Importation raises the question; would this be cost effective? As prices are volatile and availability of biomass is difficult to predict Ireland would become dependent on the uncertainty of imported biomass. It is also noted that there will be emissions from transport and distribution. The further the biomass is transported, the greater the greenhouse gas emissions²⁵. So, while biomass is currently contributing to a move to renewable energy production, on its own it is not the sole answer to meeting Ireland's renewable energy targets. Ireland has a legal obligation to diversify its energy sources requiring the development of renewable energy to avoid substantial fines.

The Joint Committee on Climate Action published its cross-party report entitled, '*Climate Change: A Cross-Party Consensus for Action*' (March 2019). This report highlights the requirements for alternate energy production. More specifically, the report notes that it is currently planned to stop burning coal at Moneypoint by 2025 as well as peat at Bord na Mona and ESB stations by 2030. In December 2022, the Department of Environment, Climate and Communications published its Climate Action Plan (CAP), which notes the need for renewable alternatives to coal and peat. Further information on the CAP can be seen in Chapter 2, Section 2.2.

Climate Action Plan 2024 states that as electrification and decarbonisation of other sectors continues, there will be an increase in electricity demand, and a transferring of emissions from those sectors to the electricity sector. The deployment of renewables needs to outpace the growth in energy demand for it to deliver the absolute reductions in greenhouse gas emissions required. Therefore, the timing of the delivery of the renewable energy generation relative to the scale and pace of growth in electricity demand is a critical factor. In the high demand scenario outlined in the Programme for Government, electricity demand will almost double by 2030, while electricity emissions are to be reduced by 60-80% at the same time.

Underlying drivers of changes in electricity demand include:

- Data centres are forecast to continue to grow by up to ~9 TWh in 2030 (~2316% of total demand).
- Transport electricity demand is forecast to grow (~23% p.a.) as a result of fast uptake of EV charging.
- Electrical heating in industry will increase by more than 2.5 times in 2030 from 2017 levels.

²⁴ http://www.seai.ie/News_Events/Press_Releases/2014/Biomass-is-a-big-part-of-the-solution-but-not-the-whole-solution.html

²⁵ Sustainability Criteria Options and Impacts for Irish Bioenergy Resources (SEAI 2019)



Building energy efficiency improvements from an extensive retrofit programme will moderate the growth in electricity demand from new heat pumps in buildings.

Against this backdrop, the importance of wind energy as the main component of Ireland's renewable energy development is acknowledged, and wind energy is accepted as the main contributor to meeting the Country's national climate change and energy supply obligations. Notwithstanding this, it must also be acknowledged that not every part of Ireland is well endowed with wind resources and therefore, not all counties will be able to deliver wind-based renewable energy. Furthermore, whilst it is accepted that there are other renewable energy technologies in operation, for the foreseeable future many areas will be unable to deliver significant renewable energy output. This primarily applies to the more populous areas.

National and international renewable energy and climate change targets must be achieved, and it is crucial that these are appropriately translated and implemented at regional and local levels. Wind farm development and design involves balancing the sometimes-conflicting interests of constraints (e.g. natural and built heritage, human beings, ecological, ground conditions, hydrological, etc.) with visual amenity and the technological/economic requirements/realities of the specific project and turbines.

1.5.5 Reduction of Carbon Emissions and Other Greenhouse Gases

The production of renewable energy from the Proposed Project will assist in achieving the Government's and EU's stated goals of ensuring safe and secure energy supplies, promoting an energy future that is sustainable and competitively priced to consumers whilst combating energy price volatility and the effects of climate change. The White Paper in 2015 outlines an ambitious Greenhouse gas reduction target of between 80% to 95% compared to 1990 levels out to 2050. Furthermore, if national carbon emissions targets are divided out amongst each county, each Local Authority may be responsible for meeting its own targets.

In addition to a reduced dependence on oil and other imported fuels, the generation of electricity from wind power by the Proposed Project will displace approximately 50,822 tonnes of carbon emissions per annum from the largely carbon-based traditional energy mix, the detail of which is presented in Section 11.5.2.1.2 in Chapter 11 of this EIAR.

The World Health Organisation (WHO) in 2019 estimated that ambient (outdoor) air pollution caused 4.2 million deaths worldwide in 2019.²⁶ The Environmental Protection Agency (EPA) report '*Air Quality in Ireland 2022*⁴⁷ noted that in Ireland, the premature deaths attributable to poor air quality are estimated at 1,300 people per annum. The European Environmental Agency (EEA) Report, '*Air Quality in Europe – 2022 Report*⁴⁸ highlights the negative effects of air pollution on human health. The report assessed that poor air quality in Europe accounted for premature deaths of approximately 238,000 people in the 27 EU Member States in 2021. The estimated impacts on the population in Europe of exposure to NO₂ and O₃ concentrations in 2021 were around 49,000 and 24,000 premature deaths per year, respectively. Of these numbers, 610 deaths due to poor air quality were estimated in Ireland in 2020 with 490 Irish deaths attributed to PM_{2.5}, 50 Irish deaths attributed to nitrogen oxides (NO₂) and 70 Irish deaths attributed to Ozone (O₃). These emissions, along with others, including sulphur oxides (SO_x), are produced during fossil fuel-based electricity generation in various amounts, depending on the fuel and technology used, emissions from industry and power plants, vehicles emissions and transport fuels.

²⁶ <u>https://www.who.int/news-room/fact-sheets/detail/ambient-(outdoor)-air-quality-and-health</u>
²⁷ Air Quality in Ireland Report 2022 <<u>https://www.epa.ie/publications/monitoring-</u>

assessment/air/Air_Quality_Report_22_v8v2.pdf>

²⁸ Air Quality in Europe 2022 <<u>https://www.eea.europa.eu/publications/air-quality-in-europe-2022</u>>



The EPA 2016 report '*Ireland's Environment – An Assessment*²⁹ states that the pollutants of most concern are NOx, (the collective term for the gases nitric oxide and nitrogen dioxide, PM (particulate matter) and O₃ (ozone). The EPA 2016 report goes on to state that:

"Ireland has considerable renewable energy resources, only a fraction of which are utilised to address our energy requirements.

Wind, ocean, solar, hydro and geothermal energy do not produce GHG emissions or emissions of air pollutants such as particulates, sulphur dioxide and nitrogen dioxide. Use of these renewable resources can have **considerable co-benefits for human health and ecosystems**. Meeting energy requirements from renewable resources can provide significant economic and employment benefits at local to national scales."

The Proposed Project therefore represents an opportunity to further harness Ireland's significant renewable energy resources, with valuable benefits to air quality and in turn to human health. The consumption of fossil fuels for energy results in the release of particulates, sulphur dioxide and nitrogen dioxide to our air. The use of wind energy, by providing an alternative to electricity derived from coal, oil or gas-fired power stations, results in emission savings of carbon dioxide (CO_2), oxides of nitrogen (NO_x), and sulphur dioxide SO₂, thereby resulting in cleaner air and associated positive health effects.

1.5.6 **Economic Benefits**

In addition to helping Ireland avoid significant fines and reducing environmentally damaging emissions, the Proposed Project will have significant economic benefits. At a national level, Ireland currently has one of the highest external dependencies on imported sources of energy, such as coal, oil and natural gas. As detailed in the SEAI Report '*Energy in Ireland – 2023 Report*', Ireland has a high import dependence on oil and gas and is essentially a price-taker on these commodities. The '*Energy in Ireland 2022 Report*⁸⁰ stated that 2021 was the first year since 2016, in which Irelands indigenous production of energy from renewables (17,500 GWh) exceeded that of indigenous gas (14,600 GWh); however, in 2022 indigenous gas production once again exceeded renewables production. The SEAI estimates electricity emissions to be 7.3 MtCO₂e in 2023, the addition of this best estimate for 2023 to the definitive 2021 and 2022 electricity emissions reported by the EPA identifies a 3-year 2021 - 2023 total of 27.0 MtCO₂e. The 5-year 2021-2025 sectoral emission ceiling for electricity is 40 MtCO₂e. This means that 13.0 MtCO₂e of budgeted electricity emissions will remain for the last 2 years of the 2021-2025 carbon budget. To remain within its sectoral emission ceiling, electricity emissions would therefore need to remain below an average of 6.5 MtCO₂e in both 2024 and 2025.

The SEAI report 'Energy in Ireland – 2023 Report' indicated that wind energy:

- > Accounted for 85.7% of renewable energy generated in 2022.
- Capacity at the end of 2022 was 4.54GW, this is a 4.6% increase from wind energy capacity in 2021.

The 2014 report '*The Value of Wind Energy to Ireland*', published by Pőyry, stated that growth of the wind sector in Ireland could support 23,850 jobs (construction and operational phases) by 2030. If Ireland instead chooses to not develop any more wind, then by 2030 the country will be reliant on natural gas for most of our electricity generation, at a cost of €671 million per annum in fuel import costs.

In April 2021, Wind Energy Ireland published a report produced by KPMG on the '*Economic Impact* of Onshore Wind in Ireland' stating that Irish wind farms are worth \notin 400 million to the economy every year and it is expected to rise to \notin 550 million by the end of the decade. If Ireland are to achieve the

²⁹ Ireland's Environment – An Assessment (2016) <<u>https://epawebapp.epa.ie/ebooks/soe2016/files/assets/basic-html/page-1.html#</u>>

³⁰ Sustainable Energy Authority Ireland (2022) Energy in Ireland – 2022 Report



8,200 MW target set in the Climate Action Plan 2021, the total industrial output across operating and capital activities would rise from 1.1bn in 2020 (from the 4,200 MW installed capacity) to 1.5bn in 2030.

The Proposed Project will be capable of providing power to over 40,880 households every year, as presented in the calculations in Section 4.3.1.1.6 of this EIAR.

The Proposed Project will help to supply the rising demand for electricity, resulting from renewed economic growth. The EirGrid report '*All-Island Generation Capacity Statement 2022 – 2031*' (December 2022) notes that the median electricity demand forecast on the island of Ireland is expected to grow by 21% in 2030. Much of this growth is expected to come from new data centres in Ireland.

The Proposed Project will have both long-term and short-term benefits for the local economy including income to local landowners, job creation, work opportunities for local businesses and service providers, local authority commercial rate payments and a Community Benefit Scheme.

Commercial rate payments from the Proposed Project will be provided to Galway County Council each year during the construction phase, which will be redirected to the provision of public services within Co. Galway. These services include provisions such as road upkeep, fire services, environmental protection, street lighting, footpath maintenance etc. along with other community and cultural support initiatives.

It is estimated that the Proposed Project has the potential to create up to 100 jobs during the construction phase and 2-3 jobs during operational and maintenance phases of the Proposed Project. During construction, additional indirect employment will be created in the region through the supply of services and materials to the renewable energy development. There will also be income generated by local employment from the purchase of local services i.e. travel, goods and lodgings. Further details on employment associated with the Proposed Project are presented in Section 5.9 of this EIAR.

Should the Proposed Project receive planning permission, there are substantial opportunities available for the local area in the form of Community Benefit Funds. Based on the current proposal, should the Proposed Project enter the Renewable Energy Support Scheme (RESS), the proposed Community Benefit Fund would attract a community contribution in the region of approximately €340,000/year for the first 15 years of operation, to be used by the local community over the lifetime of the Proposed Project. The value of this fund will be directly proportional to the energy produced at the site and will support and facilitate projects and initiatives in the area.

Further details on the proposed Community Gain proposals are presented in Appendix 2-2 and Section 4.5 in Chapter 4 of this EIAR.

1.6 Purpose and Scope of the EIAR

The purpose of this EIAR is to document the current state of the environment on and in the vicinity of the Site and to quantify the likely significant effects of the Proposed Project on the environment. The compilation of this document serves to highlight any areas where mitigation measures may be necessary in order to protect the surrounding environment from the possibility of any negative impacts arising from the Proposed Project.

It is important to distinguish the Environmental Impact Assessment (EIA) to be carried out by An Bord Pleanála, from the EIAR accompanying the planning application. The EIA is the assessment carried out by the competent authority, which includes an examination that identifies, describes and assesses in an appropriate manner, in the light of each individual case and in accordance with Articles 4 to 11 of the Environmental Impact Assessment Directive, the direct and indirect significant effects of the Proposed Project on the following:

a) population and human health



- *b)* biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC
- c) land, soil, water, air and climate
- d) material assets, cultural heritage and the landscape
- e) the interaction between the factors referred to in points (a) to (d)

The EIAR submitted by the applicant provides the relevant environmental information to enable the EIA to be carried out by the competent authority. The information to be contained in the EIAR is prescribed Article 5 of the revised EIA Directive described in Section 1.2 above.

1.7 Structure and Content of the EIAR

1.7.1 General Structure

This EIAR uses the grouped structure method to describe the existing environment, the potential impacts of the Proposed Project thereon and the proposed mitigation measures. Background information relating to the Proposed Project, scoping and consultation undertaken and a description of the Proposed Project are presented in separate sections. The grouped format sections describe the impacts of the Proposed Project in terms of population and human health, biodiversity, with specific attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EEC; land, soils and geology, water, air quality, climate, noise and vibration, landscape and visual, cultural heritage and material assets such as traffic and transportation, vulnerability to major accidents and natural disasters, together with the interaction of the foregoing and schedule of mitigation and monitoring.

The chapters of this EIAR are as follows:

- > Introduction
- > Background to the Proposed Project
- > Considerations of Reasonable Alternatives
- > Description of the Proposed Project
- > Population and Human Health
- > Biodiversity (excluding Birds)
- > Birds
- Land, Soils and Geology
- > Water
- > Air Quality
- Climate
- > Noise and Vibration
- > Landscape and Visual
- > Cultural Heritage
- Material Assets (including Traffic and Transport, Telecommunications and Aviation)
- > Major Accidents and Natural Disasters
- > Interactions of the Foregoing
- > Schedule of Mitigation Measures

The EIAR also includes a Non-Technical Summary, which is a condensed and easily comprehensible version of the EIAR document. The non-technical summary is laid out in a similar format to the main EIAR document and comprises a description of the Proposed Project followed by the existing environment, impacts and mitigation measures presented in the grouped format.



1.7.2 **Description of Likely Significant Effects and Impacts**

As stated in the 'Guidelines on the Information to be Contained in Environmental Impact Assessment Reports' (EPA, May 2022), an assessment of the likely impacts of a development is a statutory requirement of the EIA process. The statutory criteria for the presentation of the characteristics of potential impacts requires that potential significant impacts are described with reference to the extent, magnitude, complexity, probability, duration, frequency, reversibility and trans-boundary nature (if applicable) of the impact.

The classification of impacts in this EIAR follows the definitions provided in the Glossary of Impacts contained in the EPA 2022 Guidelines document.

The European Commission published a number of guidance documents in December 2017 in relation to Environmental Impact Assessment of Projects (Directive 2011/92/EU as amended by 2014/52/EU) including '*Guidance on Screening*', '*Guidance on Scoping*' and '*Guidance on the preparation of the Environmental Impact Assessment Report*, which have also been consulted.

Table 1-2 presents the glossary of impacts as published in the EPA guidance documents. Standard definitions are provided in this glossary, which permit the evaluation and classification of the quality, significance, duration and type of impacts associated with a proposed project on the receiving environment. The use of pre-existing standardised terms for the classification of impacts ensures that the EIA employs a systematic approach, which can be replicated across all disciplines covered in this EIAR. The consistent application of terminology throughout this EIAR facilitates the assessment of the Proposed Project on the receiving environment.

| Impact Characteristic | Term | Description |
|-----------------------|-----------------|---|
| | Positive | A change which improves the quality of the environment |
| Quality | Neutral | No effects or effects that are imperceptible, within normal bounds of variation or within the margin of forecasting error. |
| | Negative | A change which reduces the quality of the environment |
| | | |
| | Imperceptible | An effect capable of measurement but without significant consequences |
| Significance | Not significant | An effect which causes noticeable changes in the character of the environment but without significant consequences. |
| | Slight | An effect which causes noticeable changes in the |

Table 1-2 Impact Classification Terminology (EPA, 2022)



| Impact Characteristic | Term | Description |
|------------------------|------------------|---|
| | | character of the environment without affecting its sensitivities |
| | Moderate | An effect that alters the character of the environment in a manner consistent with existing and emerging baseline trends |
| | Significant | An effect, which by its character, magnitude, duration or intensity alters a sensitive aspect of the environment |
| | Very significant | An effect which, by its character, magnitude, duration or intensity significantly alters most of a sensitive aspect of the environment |
| | Profound | An effect which obliterates sensitive characteristics |
| | | |
| Extent & Context | Extent | Describe the size of the area, number of sites and the proportion of a population affected by an effect |
| | Context | Describe whether the extent, duration, or frequency will conform or contrast with established (baseline) conditions |
| | | |
| Probability | Likely | Effects that can reasonably be expected to occur because of the planned project if all mitigation measures are properly implemented |
| | Unlikely | Effects that can reasonably be expected not to occur because of the planned project if all mitigation measures are properly implemented |
| | | |
| Duration and Frequency | Momentary | Effects lasting from seconds to minutes |



| Impact Characteristic | Term | Description |
|-----------------------|----------------|---|
| | Brief | Effects lasting less than a day |
| | Temporary | Effects lasting less than a year |
| | Short-term | Effects lasting one to seven years |
| | Medium-term | Effects lasting seven to fifteen years |
| | Long-term | Effects lasting fifteen to sixty years |
| | Permanent | Effect lasting over sixty years |
| | Reversible | Effects that can be undone, for example through remediation or restoration |
| | Frequency | Describe how often the effect will occur. (once, rarely, occasionally, frequently, constantly – or hourly, daily, weekly, monthly, annually) |
| | | |
| Туре | Indirect | Impacts on the environment, which are not a direct result of the project, often produced away from the project site or because of a complex pathway |
| | Cumulative | The addition of many minor or significant effects, including effects of other projects, to create larger, more significant effects. |
| | 'Do Nothing' | The environment as it would be in the future should the subject project not be carried out |
| | 'Worst Case' | The effects arising from a project in the case where mitigation measures substantially fail |
| | Indeterminable | When the full consequences of a change in the environment cannot be described |



| Impact Characteristic | Term | Description |
|-----------------------|--------------|--|
| | Irreversible | When the character, distinctiveness, diversity, or reproductive capacity of an environment is permanently lost |
| | Residual | Degree of environmental change that will occur after the proposed mitigation measures have taken effect |
| | Synergistic | Where the resultant effect is of greater significance than the sum of its constituents |

Each impact is described in terms of its quality, significance, duration and type, where possible. A 'Do-Nothing' impact is also predicted in respect of each environmental theme in the EIAR. Residual impacts are also presented following any impact for which mitigation measures are prescribed. The remaining impact types are presented as required or applicable throughout the EIAR. Any potential interactions between the various aspects of the environment assessed throughout this EIAR are presented in Chapter 17: Interaction of the Foregoing.



1.8 **Project Team**

1.8.1 Project Team Responsibilities

The companies and staff listed in Table 1-3 were responsible for completion of this EIAR of the Proposed Project. Further details regarding project team members are provided below.

The EIAR project team comprises a multidisciplinary team of experts with extensive experience in the assessment of wind energy developments and in their relevant area of expertise. The qualifications and experience of the principal staff from each company involved in the preparation of this EIAR are summarised in Section 1.8.2 below. Each chapter of this EIAR has been prepared by a competent expert in the subject matter.

| Consultants | Principal Staff Involved in Project | EIAR Input* |
|--|---|--|
| MKO Tuam Road, Galway, H91 VW84 | Gus McCarthy Brian Keville Michael Watson Sean Creedon Órla Murphy Niamh McHugh Keelin Bourke John Willoughby Ronan Dunne Tommy Harlin Pat Roberts John Hynes Aoife Joyce Rachel Walsh Dervla O'Dowd Padraig Cregg Susan Doyle Kathryn Sheridan Jack Workman Saoirse Fitzsimmons James Newell Joseph O'Brien | Project Managers, Scoping and Consultation, Preparation of Natura Impact Statement, EIAR Report Sections: 1. Introduction 2. Background to the Proposed Project 3. Considerations of Reasonable Alternatives 4. Description of the Proposed Project 5. Population & Human Health 6. Biodiversity 7. Birds 10. Air & Climate 12. Landscape & Visual 14. Material Assets (non- Traffic) 15. Interaction of the Foregoing 16. Major Accidents and Natural Disasters 17. Schedule of Mitigation |
| Hydro Environmental Services 22 Lower Main Street Dungarvan Co. Waterford | Michael Gill Adam Keegan | Flood Risk Assessment,Drainage Design, Preparationof EIAR Sections:8. Land, Soils & Geology9. Water |
| Danú Energy Consulting Suite B3, 15-18 Earlsfort Terrace, Saint Kevin's Dublin 2 D02 YX28 | Cormac Ó'Dubhtaigh | Engineering Design Inputs |

Table 1-3 Companies and Staff Responsible for EIAR Completion



| Consultants | Principal Staff Involved in Project | EIAR Input* |
|---|--|---|
| AWN The Tecpro Building IDA Business and Technology Park Clonshaugh Dublin 17 | Mike Simms Dermot Blunnie | Baseline Noise Survey, Preparation of EIAR Section 11. Noise and Vibration |
| Tobar Archaeological Services Saleen Midleton Co. Cork | Miriam Carroll | Preparation of EIAR Section 13. Cultural Heritage |
| Alan Lipscombe Traffic and Transport Consultants Claran, Headford, Co. Galway | Alan Lipscombe | Swept Path Analysis, Preparation of EIAR Section 14. Material Assets - Traffic and Transport |
| Triturus Environmental Ltd 42 Norwood Court, Rochestown, Cork, T12 ECF3 | Ross Macklin Bill Brazier | Aquatic Sampling and baseline reporting |

* (A Statement of Authority is included in each chapter of this EIAR detailing the experts who contributed to the preparation of this report, identifying for each such expert the part or parts of the report which he or she is responsible for or to which he or she contributed, his or her competence and experience, including relevant qualifications in relation to such parts, and such additional information in relation to his or her expertise that demonstrates the expert's competence in the preparation of the report and ensures its completeness and quality.

1.8.2 **Project Team Members**

1.8.2.1 **MKO**

Gus McCarthy BA, MRUP, MIPI

Augustine (Gus) McCarthy is a Company Director with MKO and is a professional planner with over 35 years of experience in both private practice and local authorities combined. Prior to establishing AP McCarthy Planning Consultants in 2000, Gus worked as a Senior Planner for both Galway County Council and Galway City Council. Gus has significant experience in a wide range of projects and extensive experience in both terrestrial and coastal/marine based developments. He is retained as planning advisor for development programmes of large organisations and has been the lead planning consultant on a wide range of infrastructure, energy, commercial and other projects throughout the Country.



Brian Keville B.Sc. (Env.)

Brian Keville has over 20 years' professional experience as an environmental consultant having graduated from the National University of Ireland, Galway with a first-class honours' degree in Environmental Science. Brian was one of the founding directors of environmental consultancy, Keville & O'Sullivan Associates Ltd., prior to the company merging in 2008 to form McCarthy Keville O'Sullivan Ltd. Brian's professional experience has focused on project and environmental management, and environmental impact assessments. Brian has acted as project manager and lead-consultant on numerous environmental impact assessments, across various Irish counties and planning authority areas. These projects have included large infrastructural projects such as roads, ports and municipal services projects, through to commercial, mixed-use, industrial and renewable energy projects. The majority of this work has required liaison and co-ordination with government agencies and bodies, technical project teams, sub-consultants and clients.

Michael Watson, MA; MIEMA, CEng, PGeo

Michael Watson is a Director of Environment in MKO. Michael has over 20 years' experience in the environmental sector. Following the completion of his master's degree in environmental resource management, Geography, from National University of Ireland, Maynooth he worked for the Geological Survey of Ireland and then a prominent private environmental & hydrogeological consultancy prior to joining MKO in 2014. Michael's professional experience includes managing Environmental Impact Assessments, EPA License applications, hydrogeological assessments, environmental due diligence and general environmental assessment on behalf of clients in the wind farm, waste management, public sector, commercial and industrial sectors nationally. Michaels key strengths include project strategy advice for a wide range and scale of projects, project management and liaising with the relevant local authorities, Environmental Protection Agency (EPA) and statutory consultees as well as coordinating the project teams and sub-contractors. Michael is a key member of the MKO senior management team and as head of the Environment Team has responsibilities to mentor various grades of team members, foster a positive and promote continuous professional development for employees. Michael also has a Bachelor of Arts Degree in Geography and Economics from NUI Maynooth, is a Member of IEMA, a Chartered Environmentalist (CEnv) and Professional Geologist (PGeo).

Sean Creedon B.Sc., Diploma, MSc

Sean is an Associate Director in the Environment Team at MKO. He oversees a team of highly skilled environmental professionals working on EIAR for large-and medium scale Renewable Energy infrastructure. Sean has directed and overseen multiple renewable energy projects across wind, solar, battery and hydrogen as well as a range of thermal and other energy related developments. He is a member of the MKO senior management team responsible for developing the business, mentoring team members, fostering a positive culture and promoting continuous employee professional development. Sean has over 22 years' experience in program and project development, holds an MSc from NUI Galway and a Diploma in Project Management from Institute of Project Management Ireland.

Órla Murphy B.Sc., M. Sc

Órla Murphy is a Senior Environmental Scientist with MKO, with nearly 8 years of experience in private consultancy. Órla holds BSc (Hons) in Geography from Queens University Belfast & a MSc in Environmental Protection and Management from the University of Edinburgh. Prior to taking up her position with McCarthy Keville O'Sullivan in January 2018, Órla worked as an Environmental Project Assistant with ITPEnergised in Scotland. Órla's key strengths and areas of expertise are in Environmental Protection and Management, EIA, Project Management, Renewable Energy and Peatland Management, where she has carried out research projects and site work relating to restoration and management of peatland sites in both Scotland and Northern Ireland. On joining MKO Órla has been involved on a range of renewable energy infrastructure projects. In her role as a project manager,



Órla works with and co-ordinates large multidisciplinary teams including members from MKO's Environmental, Planning, Ecological and Ornithological departments as well as sub-contractors from various fields in the preparation and production of EIARs. Within MKO, Órla plays a role in the management of and sharing of knowledge with junior members of staff and works as part of a large multi-disciplinary team to produce EIA Reports.

Niamh McHugh B. Sc

Niamh is an Environmental Scientist who has been working with MKO since June 2021. Niamh graduated with a First-Class Honours Degree in Environmental Science from the National University of Ireland, Galway. Since beginning her work with MKO, Niamh has been working as part of a multidisciplinary team conducting tasks such as report writing, shadow flicker assessments, project management, and QGIS mapping. Niamh's particular strengths lie in report writing and project management and communication. Niamh has been involved in the preparation of Environmental Impact Assessment Screening Reports, Strategic Environmental Assessment Reports for a wide range of projects, but mostly focusing on large-scale onshore renewable energy developments. In her role as an Environmental Scientist, Niamh has been charged with co-ordinating large multidisciplinary teams in order to produce robust Environmental Impact Assessment Reports to accompany Planning Applications for various large-scale developments.

Keelin Bourke B. Sc, MSc

Keelin is a Graduate Environmental Scientist with MKO having joined the company in September 2023. Keelin holds a BSc (Hons) in Environmental Science from University College Cork and an MSc (Dist) in Environmental Engineering from Trinity College Dublin. Prior to taking up her position with MKO, Keelin worked as an Environmental Health and Safey Officer in an EPA licensed Waste Transfer Station in Cork City. Keelin's current key strengths and areas of expertise are in environmental surveying, report writing and environmental mapping. Since joining MKO, Keelin has become a member of the MKO Environmental Renewables Team which work on producing high quality Environmental Impact Assessment Reports for a variety of Renewable Energy clients.

John Willoughby BA (Hons), MSc (Hons)

John is a Project Planner in MKO with over 7 years' experience across planning consultancy and environmental management. John holds a BA (Hons) in Geography, Planning and Environmental Policy, and an MSc (Hons) in Environmental Policy, both from UCD, and recently completed an Advanced Diploma in Planning and Environmental Law at Kings Inns. Prior to taking up his position with MKO in 2022, John worked in planning consultancy since 2017, managing and assisting with the coordination of development projects throughout the statutory planning process, from feasibility stage to final grant and planning compliance, carrying out due diligence, feasibility assessments, development potential reports, appeals, submissions and bespoke planning advice on a wide range of development projects. John also has previous experience in environmental management in both the Pharmaceutical and Infrastructure sectors.

Ronan Dunne BA (Hons), MSc (Hons)

Ronan Dunne is a Planner with MKO having joined the company in June 2022. Ronan holds a BSc (Hons) in City Planning and Environmental Policy, and a MSc (Hons) in Urban and Regional Planning from University College Dublin where he focused his studies on wind energy development.

Since joining MKO, Ronan has been involved in a range of infrastructure projects, including onshore wind, solar, battery storage and grid infrastructure developments. In his role as a planner, Ronan works with multidisciplinary teams including members from MKO's Environmental, Ecological and



Ornithological departments as well as sub-contractors from various fields in the develop/deliver reports to facilitate the planning process.

Tommy Harlin B.Sc., M. Sc

Tommy Harlin is a Planner with MKO having joined the company in March 2023. Tommy holds a BSc (Hons) in City Planning and Environmental Policy, and a MSc (Hons) in Urban and Regional Planning from University College Dublin where he focused his studies on renewable energy development.

Tommy has experience working on a wide variety of projects ranging from small scale bespoke projects, commercial and industrial projects and large-scale renewable energy projects including onshore wind, solar, grid infrastructure, and energy storage projects. Tommy's main responsibilities to date include the preparation and lodgement of planning documentation and liaising with multidisciplinary project teams and contributing to the delivery of inputs for comprehensive planning applications. Tommy is also a graduate member of the Irish Planning Institute.

Pat Roberts B.Sc. (Env.)

Pat Roberts is Principal Ecologist with MKO with over 18 years post graduate experience of providing ecological services in relation to a wide range of developments at the planning, construction and monitoring stages. Pat holds B.Sc. (Hons) in Environmental Science. Pat has extensive experience of providing ecological consultancy on large scale industrial and civil engineering projects. He is highly experienced in the completion of ecological baseline surveys and impact assessment at the planning stage. He has worked closely with construction personnel at the set-up stage of numerous construction sites to implement and monitor any prescribed best practice measures. He has designed numerous Environmental Operating Plans and prepared many environmental method statements in close conjunction with project teams and contractors. He has worked extensively on the identification, control and management of invasive species on numerous construction sites. Prior to taking up his position with MKO in June 2005, Pat worked in Ireland, USA and UK as a Tree Surgeon and as a nature conservation warden with the National Trust (UK) and the US National Park Service. Pats key strengths include his depth of knowledge and experience of a wide range of ecological and biodiversity topics and also in his ability to understand the requirements of the client in a wide range of situations. He is currently responsible for staff development, training and ensuring that the outputs from the ecology team are of a very high standard and meet the requirements of the clients and relevant legislation and guidelines. He is a full member of the Chartered Institute of Ecologists and Environmental Managers (CIEEM)

John Hynes M.Sc. (Ecology), B.Sc.

John Hynes is a Senior Ecologist and director of the Ecology team with McCarthy O'Sullivan Ltd. with over 9 years of experience in both private practice and local authorities. John holds a B.SC in Environmental Science and a M.Sc. in Applied Ecology. Prior to taking up his position with MKO in March 2014, John worked as an Ecologist with Ryan Hanley Consulting Ltd. and Galway County Council. John has specialist knowledge in Flora and Fauna field surveys. Geographic Information Systems, data analysis, Appropriate Assessment, Ecological Impact Assessment and Environmental Impact Assessment. John's key strengths and areas of expertise are in project management. GIS and impact assessment. Since joining MKO John has been involved as a Senior Ecologist on a significant range of energy infrastructure, commercial, national roads and private/public development projects. Within MKO John plays a large role in the management and confidence building of junior members of staff and works as part of a large multi-disciplinary team to produce EIS/EIAR Reports. John has project managed a range of strategy and development projects across the Ireland and holds CIEEM membership.



Aoife Joyce M.Sc. (Agribioscience), B. Sc

Aoife Joyce is an Ecologist with MKO Planning and Environmental Consultants with experience in research, consultancy and drilling contractors. Aoife is a graduate of Environmental Science (Hons.) at NUIGalway, complemented by a first-class honours MSc in Agribioscience. Prior to taking up her position with MKO in May 2019, Aoife worked as an Environmental Scientist with Irish Drilling Ltd. and held previous posts with Inland Fisheries Ireland and Treemetrics Ltd. She has a wide range of experience from bat roost identification, acoustic sampling, sound analysis, soil and water sampling, Waste Acceptability Criteria testing, electrofishing, mammal and habitat surveying to GIS, Environmental Impact Assessments (EIAs) and mapping techniques. Since joining MKO, Aoife has been involved in managing bat survey requirements for a variety of wind farm planning applications, as well as commercial, residential and infrastructure projects. This includes scope, roost assessments, deploying static bat detectors and weather stations nationwide, dawn and dusk bat detection surveys, acoustic analysis, mapping, impact assessment, mitigation and report writing. Within MKO, she works as part of a multidisciplinary team to help in the production of ecological reports and assessments. Aoife is a member of Bat Conservation Ireland and CIEEM and holds a current Bat Roost Disturbance licence.

Rachel Walsh BSc (Hons)

Rachel is an ecologist with MKO since June 2020, with over 4 years' experience in professional ecological consultancy. Rachel holds a BSc (Hons) in Environmental Science from National University of Ireland, Galway. Rachel's key strengths are in terrestrial flora and fauna ecology, including vegetation surveys, habitat mapping, invasive species surveys, mammal surveys, bat surveys and roost site potential assessment, Appropriate Assessment Screening reporting and Ecological Impact Assessment. Since joining MKO, Rachel has worked widely on energy infrastructure, commercial, recreational and residential projects, and plays a role in preparing Ecological Impact Assessment reports and Appropriate Assessment reports. Rachel is trained in carrying out bat surveys, non-volant mammal surveys and in recording vegetation relevées. She also has experience in habitat identification and habitat mapping. Within MKO, Rachel is responsible for independently carrying out and planning ecological field surveys in accordance with NRA Guidelines, carrying out bat surveys in accordance with Scottish Natural Heritage 2019 Guideline standards, habitat surveys, and Appropriate Assessment screenings as part of the ecology team. Rachel is a member of CIEEM and holds a current Bat Roost Disturbance licence.

Dervla O'Dowd B.Sc. (Env.)

Dervla O'Dowd is a Senior Ecologist and Project Manager with MKO with 18 years of experience in environmental consultancy. Dervla graduated with a first-class honours B.Sc. in Environmental Science from NUI, Galway in 2005 and joined Keville O'Sullivan Associates in the same year. Dervla has gained extensive experience in the project management and ecological assessment of the impacts of various infrastructural projects including wind energy projects, water supply schemes, road schemes and housing developments nationwide and has also been involved in the compilation of Environmental Impact Statements, with emphasis on sections such as Flora & Fauna, and acted as EIS co-ordinator on many of these projects. Dervla has also provided site supervision for infrastructural works within designated conservations areas, in particular within aquatic habitats, and has also been involved in the development of environmental/ecological educational resource materials and major ecological surveys of inland waterways. Currently, Dervla is responsible for coordinating ecological work, in particular ornithological surveys required on major infrastructural projects, with emphasis on wind energy projects. Dervla's key strengths and areas of expertise are in project management, project strategy, business development and survey co-ordination to ensure the efficient operation of the Ornithology team's field survey schedule. Dervla holds full membership of the Chartered Institute of Ecology and Environmental Management and current Safe Pass card.



Padraig Cregg M.Sc., B.Sc.

Padraig Cregg is a Senior Ornithologist with MKO with over 9 years of experience in both private practice and NGOs. Padraig holds a BSc (Hons) in Zoology and Masters in Evolutionary and Behavioural Ecology. Prior to taking up his position with McCarthy Keville O'Sullivan in December 2018, Padraig worked as a Senior Ornithologist and held previous posts with TOBIN Consulting Engineers, Energised Environments Ltd in Scotland, WSP Environment and Energy Ltd in Scotland and BirdWatch Ireland. Padraig has specialist knowledge in designing, executing and project managing ornithological assessments, primarily in the renewable industry. Padraig's key strengths and areas of expertise are in ornithology and ecology surveying and in writing Natura Impact Statements (NIS) and the Biodiversity chapter of Environmental Impact Assessment Reports (EIAR) to accompany planning applications. Since joining MKO Padraig has been involved in designing, executing and project managing the ornithological assessment on over 20 proposed wind farm developments. He has played a key role in project managing these planning applications through the statutory planning system, with more projects in the pipeline. Within MKO Padraig plays a large role in the management and confidence building of junior members of staff and works as part of a large multi-disciplinary team to produce EIAR and NIS Reports.

Susan Doyle BA, MSc, PhD

Susan Doyle is a senior ornithologist at MKO. She completed her primary degree in Zoology (moderatorship in Natural Science) at Trinity College Dublin in 2013 and her master's degree in Ecological Assessment in University College Cork in 2014. Susan has seven years' experience in ecological consultancy and has worked on wind farm projects, solar farm projects, residential developments, data centres, county council projects and National Parks and Wildlife Service projects. She specialises in ornithological consulting, including Environmental Impact Assessments and operational monitoring. Prior to joining MKO in October 2020, Susan gained experience through her involvement in several bird conservation projects, including protected curlew, seabirds, waders and waterfowl, as well as research into breeding hen harrier, satellite telemetry in migrant birds and avian diseases in Ireland, providing her with extensive experience in a wide variety of bird survey methods, data management and reporting.

Kathryn Sheridan BA., MSc (Hons)

Kathryn is an Ornithologist with MKO having joined the company in November 2020. Kathryn holds a BA (Hons) Zoology, and a MSc (Hons) in Wildlife Conservation and Management where she focused her studies on breeding Hen Harrier. Kathryn's key strengths and expertise are bird identification, GIS, data collation and report writing. Since joining MKO, Kathryn has been involved in a range of windfarm and terrestrial grassland projects. In her role as an ornithologist, Kathryn works with members from MKO's Ornithological department as well as sub-contractors from various fields in the preparation and production of interim reports and winter bird survey reports.

Jack Workman MSc.

Jack is the Landscape & Visual Team manager at MKO and is a Technician Member with the British Landscape Institute. He is a Landscape and Visual Impact Assessment Specialist with an academic background in the field of Environmental Science and Geography. Jack's primary role at MKO is conducting Landscape and Visual Impact Assessment (LVIA) for Environmental Impact Assessment reports. Jack holds a BSc. in Psychology, and an MSc. in Coastal and Marine Environments (Physical Processes, Policy & Practice) where he was awarded the Prof. Máírín De Valéra distinction in science research award. Prior to taking up his position with MKO, Jack worked as a Geospatial Analyst and Research Assistant with NUIG and also held previous posts in the coastal engineering sector with Royal Haskoning DHV and Saltwater Technologies. Since joining MKO in February 2020, Jack has conducted and project managed all aspects of LVIA for a broad range of commercial infrastructure developments including wind and solar energy projects, grid infrastructure, extraction industry and



Strategic Housing Developments. Jack holds a membership with the Chartered Institute of Water and Environmental Management and is also a member of the Landscape Research Group.

Saoirse Fitzsimmons MSc.

Saoirse Fitzsimons is a Project Environmental Scientist and LVIA Specialist with MKO. Her primary role at MKO is producing the Landscape and Visual chapter of EIA reports. Saoirse holds an MSc. In Coastal and Marine Environments from the National University of Ireland, Galway where she was awarded The Prof Micheál O Cinnéide Award for Academic Excellence. Since joining MKO, Saoirse has worked widely on renewable energy infrastructure, commercial, recreational, and residential projects. Saoirse is a qualified Unmanned Aerial Vehicle Operator and holds an A1/A3 and A2 drone licence.

James Newell

James holds the position of CAD and Information Technology Technician with MKO since joining the Company in May 2006. Prior to joining MKO, he worked as a graphic designer and illustrator for over eight years. In recent years James' role has extended to include all wind farm visual modelling completed by the company. He is proficient in the use of MapInfo GIS software in addition to AutoCAD and other design and graphics packages.

Joseph O'Brien

Joseph O'Brien holds the position of CAD Technician. Joseph holds a BA Honours Level 8 Modelmaking, Design and Digital Effect, Institute of Art Design and Technology (IADT), Dun Laoghaire & City & Guilds Level 3 2D & 3D AutoCAD certificates. Joseph's role entails various wind and solar farm projects which require various skills such as mapping, aerial registration and detailed design drawings for projects. Prior to joining us, Joseph worked as a free-lance Modelmaker and CAD Technician. His previous experience included designing various models and props through CAD and then making them for various conventions such as Dublin Comic Con and Arcade Con.

1.8.2.2 Hydro Environmental Services Ltd

Michael Gill

Michael Gill P. Geo (BA, BAI, Dip Geol., MSc, MIEI) is an Environmental Engineer and Hydrogeologist with over 18 years' environmental consultancy experience in Ireland. Michael has completed numerous hydrological and hydrogeological impact assessments of wind farms and renewable projects in Ireland. He has substantial experience in karst hydrogeology and also in surface water drainage design and SUDs design and surface water/groundwater interactions. For example, Michael has worked on the EIS/EIAR for Oweninny WF, Cloncreen WF, Derrinlough WF and Yellow River WF, and over 100 other wind farm-related projects, as well as Seven Hills WF which is situated within a mapped karst area. Michael has also worked on karst related projects in South and Mid Galway, Roscommon, Tipperary, Laois, Kilkenny, Limerick, Clare, Cork and Waterford.

Adam Keegan

Adam Keegan (BSc, MSc) is a hydrogeologist with two years of experience in the environmental sector in Ireland. Adam has been involved in Environmental Impact Assessment Reports (EIARs) for numerous projects including wind farms, grid connections, quarries and small housing developments. Adam holds an MSc in Hydrogeology and Water Resource Management. Adam has experience in intrusive site investigation works within mapped karst environments and experience in trial and production well drilling within areas mapped as Regionally Karstified. Adam has worked on several



wind farm EIAR projects, including Croagh WF, Lyrenacarriga WF (SID), Cleanrath WF, Carrownagowan WF (SID), and Seven Hills WF. Adam has also worked on water supply projects and karst related projects in Galway, Clare, Tipperary and Waterford.

1.8.2.3 **AWN**

Mike Simms

Mike Simms (Principal Acoustic Consultant) holds a BE and MEngSc in Mechanical Engineering and is a member of the Institute of Acoustics (MIOA) and of the Institution of Engineering and Technology (MIET). Mike has worked in the field of acoustics for over 20 years. He has extensive experience in all aspects of environmental surveying, noise modelling and impact assessment for various sectors including, wind energy, industrial, commercial and residential.

Dermot Blunnie

Dermot Blunnie of AWN Consulting Ltd. Dermot Blunnie (Principal Acoustic Consultant) holds a BEng (Hons) in Sound Engineering, MSc in Applied Acoustics and has completed the Institute of Acoustics (IOA) Diploma in Acoustics and Noise Control. He has been working in the field of acoustics since 2008 and is a member of the Institute of Engineers Ireland (MIEI) and the Institute of Acoustics (MIOA). He has extensive knowledge and experience in relation to commissioning noise monitoring and impact assessment of wind farms as well as a detailed knowledge of acoustic standards and proprietary noise modelling software packages. He has commissioned noise surveys and completed noise impact assessments for numerous wind farm projects within Ireland.

1.8.2.4 **Tobar Archaeological Services**

Tobar Archaeological Services is a Cork-based company in its 17th year in business. They offer professional nationwide services ranging from pre-planning assessments to archaeological excavation, and cater for clients in state agencies, private and public sectors.

Tobar's Directors, Annette Quinn and Miriam Carroll, are licensed by the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs to carry out excavations in Ireland and have carried out work directly for the National Monuments Services of the Department of the Environment, Heritage and Local Government. Tobar Archaeological Services has a proven track record and extensive experience in the wind farm industry from EIS/EIAR stage through to construction stage when archaeological monitoring is frequently required.

Miriam Carroll

Miriam holds a Degree in Archaeology (1993-1996) and a 2-year Masters in Methods and Techniques in Irish Archaeology (1996-1998) from UCC and has over 20 years' experience in private sector archaeology. Miriam has managed and co-ordinated numerous projects from commencement stage to completion on behalf of numerous small and large companies.

1.8.2.5 Alan Lipscombe Traffic and Transport Consultants

Alan Lipscombe

In January 2007 Alan Lipscombe set up an independent traffic and transportation consultancy providing advice for a range of clients in the private and public sectors. Prior to this Alan was a founding member of Colin Buchanan's Galway office having moved there as the senior transportation engineer for the Galway Land Use and Transportation Study. Since the completion of that study in



1999, Alan has worked throughout the West of Ireland on a range of projects including: major development schemes, the Galway City Outer Bypass, Limerick Planning Land-Use and Transportation Study, Limerick Southern Ring Road Phase II, cost benefit analyses (COBA) and various studies for the NUI Galway. Before moving to Galway in 1997, Alan was involved in a wide variety of traffic and transport studies for CBP throughout the UK, Malta and Indonesia. He has particular expertise in the assessment of development related traffic and transport modelling, including for numerous wind farm developments, and is an accomplished analyst who has experience of a wide variety of modelling packages and methods.

1.8.2.6 Triturus Environmental Ltd

Ross Macklin PhD (in prep) B.Sc. (Hons) MCIEEM., MIFM, HDip GIS, PDip IPM

Ross Macklin is a graduate of University College Cork. He has a BSc in Applied Ecology, Higher Diplomas in Integrated Pest Management and Geographical Information Systems. He is completing a PhD in fisheries science at UCC. His expert areas are aquatic ecology and fisheries science. Ross has 18 years of professional experience and worked on many of Ireland's largest infrastructure projects including flood relief schemes, renewables (solar & wind farms), greenways, blueways, residential, roads and biodiversity. He has also worked on projects in the waste management, petrochemical, pharmaceutical, agricultural and aquaculture industry sectors. Ross has held over 30 NPWS national licences for freshwater pearl mussel (Margaritifera margaritifera), white-clawed crayfish (Austropotamobius pallipes) and amphibian species holding full national licences for all of these species. He also has held over 20 NPWS wildlife filming licences, numerous derogation licences for otter and over 200 section 14 licences for fisheries related work.

Bill Brazier (Ph.D. (candidate), B.Sc. (Hons.) Applied Freshwater & Marine Biology, MCIEEM, MIFM)

Bill Brazier is an aquatic, fisheries and mammalian ecologist with over 12 year's professional experience in Ireland. He is a senior ecologist at Triturus Environmental Ltd. and is completing a Ph.D. in fish genetics at UCC. He has extensive experience in a wide range of ecological and environmental projects including EIAR, EcIA and AA/NIS reporting, as well as the areas of renewable energy developments, flood relief schemes, road schemes, invasive species management, blueways/greenways, biodiversity projects and non-volant mammal monitoring. He specialises in aquatic ecology and fisheries ecology, inclusive of fisheries assessments, macrophytes, water quality, otter, freshwater pearl mussel, whiteclawed crayfish and amphibians, holding full national licences for all of these species. Bill is one of Ireland's most experienced electro-fishing operators, having held over 250 section 14 authorisation licences for fisheries related work.

1.9 Difficulties Encountered

There were no technical difficulties encountered during the preparation of this EIAR.

1.10 Viewing and Purchasing of the EIAR

Copies of this EIAR will be available online for the planning application, including the Non-Technical Summary (NTS), on the Planning Section of the An Bord Pleanála website, under the relevant Planning Reference Number (to be assigned on lodgement of the application).

An Bord Pleanála: http://www.pleanala.ie/



This EIAR and all associated documentation will also be available for viewing at the offices of An Bord Pleanála, and Galway County Council. The EIAR may be inspected free of charge or purchased by any member of the public during normal office hours at the following address:

- An Bord Pleanála, 64 Marlborough Street, St. Rotunda, Dublin 1
- Galway County Council, Áras An Chontae, Prospect Hill, Galway, Co. Galway

The EIAR will also be available to view online via the Department of Planning, Housing and Local Government's EIA Portal, which will provide a link to the planning authority's website on which the application details are contained. This EIA Portal was recently set up by the Department as an electronic notification to the public of requests for development consent which are accompanied by an EIAR. (https://www.housing.gov.ie/planning/environmental-assessment/environmental-impact-assessment-eia/eia-portal)

The EIAR will also be available to view online on its dedicated SID website: http://laurclavaghinfo.com/