LETTER WIND FARM LTD

LETTER WIND FARM

CO. LEITRIM

PLANNING STATEMENT

DECEMBER 2023

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Document Final	Name Shauna Conlon	Name David Kiely
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LETTER WIND FARM, CO. LEITRIM

PLANNING STATEMENT

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STATEMENT OF AUTHORITY

This Planning Statement has been prepared by Shauna Conlon and reviewed by David Kiely of Jennings O'Donovan & Partners Limited.

Shauna Conlon is an Environmental Scientist with JOD who holds a First-Class Honours Degree (BSc. Hons) in Environmental Science from the Institute of Technology, Sligo. Since joining JOD, she has developed experience in a range of sectors through various projects with a current focus within the environment and renewable energy sector. Shauna's key capabilities include the preparation of Appropriate Assessments, Environmental Impact Assessments, and Geographic Information Systems.

David Kiely has undertaken EISs/ EIARs for wind farms throughout Ireland. He has 41 years' experience in the civil engineering and environmental sector and has obtained a Bachelor of Engineering Degree in Civil Engineering and a Master of Science degree in Environmental Protection. David has overseen the development of over 60 wind farms from feasibility, planning and environmental assessment through to construction, including the preparation of the consideration of alternatives chapters for other wind farms.

1 INTRODUCTION

This Planning Statement considers the Projects' accordance with the principles of Proper Planning and Sustainable Development, having regard to National, Regional and County-level policies and plans, together with relevant statutory guidelines. The assessment considers all permutations within the turbine parameter range as specified in **Chapter 1: Introduction**, Section 1.9.4 of the EIAR.

The Statement is set out as follows:

- **Section 1: Introduction**
- **Section 2: Development Plan Policy Appraisal**
- **Section 3: Key Environmental Matters**
- **Section 4: Economic Importance of the Proposed Development**
- **Section 5: The Development as Sustainable Development**
- **Section 6: Conclusion**

1.1 Proposed Development

Jennings O'Donovan & Partners Limited, Consulting Engineers, have prepared this Planning Statement ("the Statement") on behalf of Letter Wind Farm Ltd to accompany the application ("the Application") to Leitrim County Council ("the Planning Authority") under Section 34 of the Planning and Development Act 2000, as amended.

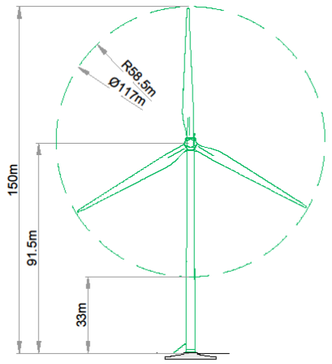
The proposed development in County Leitrim will consist of the following main components:

- Construction of 4 No. wind turbines with an overall ground to blade tip height ranging from 149.85m to 150m inclusive. The wind turbines will have a rotor diameter ranging from 115.7m to 117m inclusive and a hub height ranging from 91.5m to 92m inclusive.
- Construction of permanent turbine hardstands and turbine foundations.
- Construction of a bottomless bridge culvert across a minor stream on site (EPA River Segment Code: 26_4053).
- Construction of one temporary construction compound with associated temporary site offices, parking areas and security fencing.
- Installation of one (40-year life cycle) meteorological mast with a height of 50m and a 4m lightning pole on top.
- Construction of new internal site access tracks and upgrade of a section of existing internal Site track, to include all associated drainage.
- Improvement of existing site entrance with access via the L4282.
- Development of an internal site drainage network and sediment control systems.

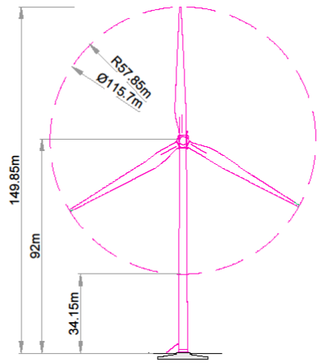
- Construction of 1 no. permanent 20kV electrical substation
- All associated underground electrical and communications cabling connecting the wind turbines to the wind farm substation.
- All works associated with the connection of the wind farm to the national electricity grid, which will be via 20kV underground cable connection approximately 6.4km in length to the existing ESB Corderry 110kV Substation in the townlands of Letter, Greaghnadarragh, Stangaun, Corralustia, Turpaun, Gortnasillagh West, Lugmeeltan, Leckaun, Lisgaveen, Treannadullagh, Drumcashlagh and Corderry.
- Ancillary forestry felling to facilitate construction of the development.
- All associated site development works including berms, landscaping, and soil excavation.
- Installation of battery arrays located within container units (2 no. units) and associated electrical plant for grid stabilisation adjacent to the substation building.
- Development of one on-site borrow pit.
- A 10-year planning permission and 40-year operational life from the date of commissioning of the entire wind farm is being sought. This reflects the lifespan of modern-day turbines.

Decommissioning will include the removal of four wind turbines and above ground concrete plinths. It will also include the meteorological mast structure, all associated underground electrical and communications cabling connecting the wind turbines to the wind farm substation (ducting is to remain in-situ), 2 No. battery storage units. All other elements of the proposed development will remain in-situ. The Site Access Roads and associated drainage systems will serve ongoing forestry and agriculture activity in the area. All other hard surfaced areas will be allowed to revegetate naturally.

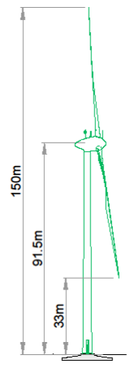
Permission is not being sought for temporary works required to accommodate the delivery of turbine components along the turbine delivery route. However, these works are assessed as part of the Project in the EIAR and are located on the R263, N56, N15, N4, R285, and R280.



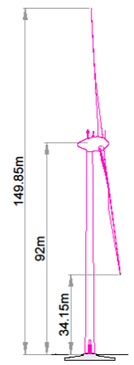
Maximum Rotor Diameter & Maximum Tip Height
Front Elevation PROPOSED (OPTION A)



Maximum Rotor Diameter & Maximum Tip Height
Front Elevation PROPOSED (OPTION B)



Maximum Rotor Diameter & Maximum Tip Height
Side Elevation PROPOSED (OPTION A)



Maximum Rotor Diameter & Maximum Tip Height
Side Elevation PROPOSED (OPTION B)

NOTES:
1. FIGURED DIMENSIONS ONLY TO BE TAKEN FROM THIS DRAWING.
2. DRAWING TO BE USED FOR PLANNING PURPOSES ONLY.
3. ALL LEVELS REFER TO ORDNANCE DATUM (MALIN HEAD).
4. ENGINEER TO BE INFORMED OF ANY DISCREPANCIES BEFORE ANY WORK COMMENCES.

MATERIAL/FINISH SPECIFICATIONS
* BLADE MATERIAL - GLASSFIBRE REINFORCED EPOXY
* TOWER MATERIAL - CONICAL TUBULAR STEEL

TURBINES WILL BE FINISHED TO A WHITE / OFF WHITE OR GREY COLOUR WITH A MATT NON - REFLECTIVELY FINISH AS AGREED WITH THE PLANNING AUTHORITY.

RECEIVED: 19/01/2024

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THIS DRAWING IS NOT TO BE USED AS A CONSTRUCTION DRAWING.

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Client
LETTER WIND FARM LIMITED

Project
PROPOSED WIND FARM
AT LETTER, DRUMKEERAN
CO. LEITRIM.

Stage
PLANNING

Title
CANDIDATE TURBINE
DIMENSIONAL CONSIDERATIONS
ELEVATIONS

Scales
1:1000 @ A1

Surveyed	Prepared By	Checked	Date
	JB	S.C	12/2023

Job No.	Drawing No.	Figure No.	Revision
5969	PL-604		

Figure 1.1: Candidate Turbine Dimensional Considerations Elevations

The Site

The Site extends to 45 hectares (ha) and has a mixed use as both commercial forestry and upland grazing. The Site contains 19.8ha of commercial forestry with average yield, consisting of mixed quality, semi-mature Lodgepole pine and Sitka Spruce. Two hectares of forestry will be felled to accommodate the placement of Turbine 1 (T1) and Turbine 2 (T2). The felling area proposed is the minimum necessary to construct the Development and to comply with any environmental mitigation. Suitable replacement land has been sourced in Coolatty, Clones, Co. Monaghan which is 72km from the Site and also outside any potential hydrological pathways of connectivity i.e., outside the catchment within which the proposed project is located. The afforestation is not part of this planning application and will be subject to a separate licence process with the Department of Agriculture, Food and the Marine. The Site is located approximately 2.9km west of Drumkeeran Village, Co. Leitrim and approximately 21km southeast of Sligo Town.

The Site is situated along sloping lands situated at between c. 230-260m AOD. A Site Location Map showing the site boundary is outlined in **Figure 1.2** below.

The Site is located on lands under the ownership of the Developer, and two third party landowners all of whom have consented to the application and the Development. Letters of consent accompany this application.

Environmental Impact Assessment Directive 2011/92/EU (as amended), **Habitats Directive** 92/43/EEC (as amended) & **Birds Directive** 2009/147/EU (as amended).

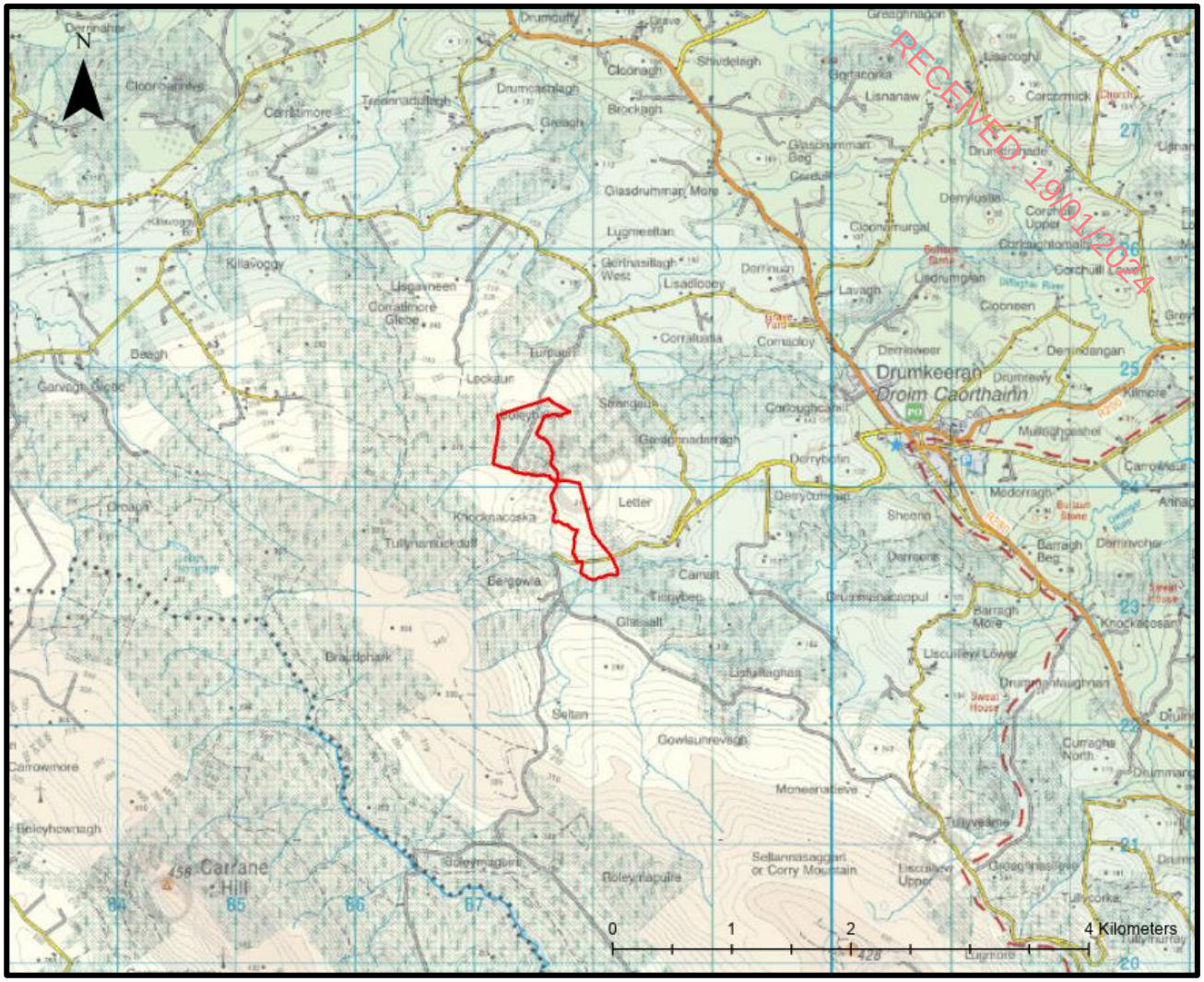

Figure 1.2: Site Location Map

The Development requires an Environmental Impact Assessment (EIA) as it comes within class 3(i) of Annex II to the EIA Directive 2011/92/EU as amended by Directive 2014/52/EU and is above the threshold set for this class of project by Schedule 5, Part 2 of the Planning and Development Regulations 2001, as amended. An Environmental Impact Assessment Report (EIAR) is submitted with this application.

A report to inform screening for appropriate assessment has been prepared by the Developer and is submitted to the competent authority with the application, in this case Leitrim County Council, to assist them in their determination of whether an appropriate assessment is required for the Development in accordance with the Habitats Directive 1992/43/EEC and the Birds Directive 2009/147/EU, as transposed by Part XAB of the Planning and Development Act 2000, as amended.

While Leitrim County Council, as the competent authority, carries out the screening assessment and are required to reach their own conclusion, the findings of the screening report indicate that appropriate assessment of the Development is required. Therefore, in anticipation of the competent authority finding that appropriate assessment is required, a Natura Impact Statement (NIS) has been prepared and forms part of the documentation submitted with the planning applications for the Project.

The Natura Impact Statement which accompanies this application has considered the potential effects of the proposed Project, alone and in combination with other plans and projects on the five European sites identified as within the zone of influence of the Development. The NIS contains sufficient information to allow Leitrim County Council, as the competent authority, to carry out appropriate assessment of the Project and determines it will not adversely affect the integrity of European sites.

1.2 Need for the Development- International and National Policy

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

1.3 The Climate Emergency

On 29th November 2019 the European Parliament declared a climate emergency ahead of the UN COP 25 in Madrid in December 2019. In May 2019 the Oireachtas declared a "climate emergency" in an amendment to the report 'Climate Action: A cross-party consensus for action' which followed the recommendations of the Citizens Assembly on Climate Action. There then followed the publication of the Cross-Departmental Climate Action Plan 2019 on 17th June 2019. The Plan reflects the accepted wisdom that decisive and urgent action is required to arrest the acceleration of greenhouse gas emissions within the limited window of opportunity that remains. The Plan is ambitious, affecting almost every sector of the economy. The key focus of the Plan is to identify how the Government will reduce Ireland's, still growing, greenhouse gas emissions.

The Plan includes a commitment to make Ireland 100% carbon neutral by 2050 and contains 183 action points designed to achieve our national climate change targets. The scale of the challenge is huge, and the Plan identifies the need for everyone to contribute to tackling the challenges posed by climate change. It includes increased renewable electricity targets, the end of single use nonrecyclable plastics and new building regulations. It will impact how our homes and businesses are heated, how we generate and consume electricity, how we travel

and how food is produced. This includes supporting the growth of Electric Vehicles to at least 800,000 and implementing policies to attain the installation of 600,000 heat pumps to decarbonise heating demand and meeting 70% of this increased electricity demand, from renewable sources (increased to 80% in the CAP2023), all by 2030. This is more than double the current level of renewable energy penetration.

More recently, the Government pledged to generate 80% of the country's electricity supply from renewable sources by 2030 in the (updated) Climate Action Plan 2023. Ireland is facing significant challenges in efforts to meet these targets alongside its commitment to transition to a low carbon economy by 2050. Onshore wind energy, in line with the CAP2023 needs to increase to 9GW by 2030, requiring an additional 4.7GW of installed capacity, double the existing onshore wind capacity. Renewables accounted for 36.4% of electricity generated in 2021 (with wind energy generating 85% of this), this needs to increase to 80% by 2030 to achieve the national target. Therefore, there is a clear necessity, and it is of urgent national importance to increase the amount of energy from renewable sources, especially onshore wind, which is capable of being deployed in the near term.

1.4 International Energy Policy

International energy policy is based on the demand to battle climate change and reduce carbon dioxide (CO_2) emissions and, therefore, is relevant to renewable energy development.

The United Nations Framework Convention on Climate Change (UNFCC)[1] implemented by the United Nations in May 1992, determined a long-term objective to lessen greenhouse gases in the atmosphere, with the purpose of preventing anthropogenic interference with the climatic system. Subsequently, the Kyoto Protocol was implemented in 1997. National governments who signed up to the Kyoto Protocol are committed to reducing their greenhouse gas emissions. The UNFCCC recognises that the climate system is a shared resource whose stability can be affected by industrial and other emissions of carbon dioxide and other greenhouse gases. The convention enjoys near universal membership, with 197 countries listed as being Parties to the Convention.

The Kyoto Protocol is an international treaty which extends the 1992 United Nations Framework Convention. The Kyoto Protocol came into effect in 2005, as a result of which, emissions reduction targets agreed by developed countries, including Ireland, are now binding. Under the Kyoto Protocol, the EU agreed to achieve a significant reduction in total

[1] The United Nations Framework Convention on Climate Change (UNFCCC) (1992). Available at http://unfccc.int/resource/docs/convkp/conveng.pdf. [Accessed on 30/09/23]

greenhouse gas emissions of 8% below 1990 levels in the period 2008 to 2012. Ireland's contribution to the EU commitment for the period 2008 – 2012 was to limit its greenhouse gas emissions to no more than 13% above 1990 levels.

In Doha, Qatar, on 8 December 2012, the Doha Amendment to the Kyoto Protocol was adopted. The amendment includes:

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

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

The Paris Agreement is a legally binding international treaty on climate change. It was adopted by 196 Parties at COP 21 in Paris, on 12 December 2015 and entered into force on 4 November 2016. It seeks to accelerate and intensify the actions and investment needed for a sustainable low carbon future. Its central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. The Agreement also aims to strengthen the ability of countries to deal with the impacts of climate change. On 5 October 2016, the threshold for entry into force of the Paris Agreement was achieved. Ireland is legally bound by Article 7 of the United Nations COP21 Paris Agreement, signed in December 2015, to prepare and submit periodic updates on its national adaptation and mitigation plans in the global effort to keep global warming below 1.5°C.

The United Nation's (UN) 26th global climate summit was held in 2021 in Glasgow, where nations committed to a range of decisions in a collective effort to limit global temperatures to 1.5 degrees. The conference focussed on driving action across.

- Mitigation - reducing emissions
- Adaptation - helping those already impacted by climate change

- Finance - enabling countries to deliver on their climate goals
- Collaboration - working together to deliver even greater action

Out of 189 Parties that have ratified the Paris Agreement, 90% mentioned renewables and roughly 70% included quantifiable energy targets in their initial Nationally Determined Contributions. However, a report by the International Energy Agency[2] cautions that renewables growth will still need to double to reach the Paris Agreement goal of achieving net-zero emissions by 2050. The International Renewable Energy Agency (IRENA), an intergovernmental organisation focusing on sustainable energy, in a report[3] on the Nationally Determined Contributions relating to renewable energy also note that even with the renewable energy pledges in the 2021 Paris agreement the 1.5°C goal will still be exceeded before the end of the century.

Ireland is one of the 186 countries signed up to the Paris agreement, under the terms, Ireland is required to reduce greenhouse gas emissions by at least 40% by 2030 when compared with levels in 1990. The proposed Development will displace heavily polluting fossil fuels by producing renewable wind energy.

1.5 European Energy Target

The European Union's (EU) energy policies are set out and powered by three main objectives:

- To ensure energy providers operate in a competitive environment, ensuring affordable prices for homes and businesses;
- To secure energy supplies and to ensure reliable energy delivery whenever and wherever it is needed; and
- To have sustainable energy consumption, through lowering dependence on fossil fuels and decreasing greenhouse gas emissions and pollution.

The EU enacted the Renewable Energy Directive 2009/28/EC, revised in 2018 and 2023. On 31 October 2023, the final version of the amended Renewable Energy Directive was published in the Official Journal of the EU. Member states will then have 18 months to transpose it into national law. The Directive aims to increase the share of renewable energy in the EU's overall energy consumption to 42.5% by 2030, with a further indicative target of 2.5%

[2] IEA. (2021) Renewables 2021. Available at https://www.iea.org/reports/renewables-2021. [Accessed on 30/09/23]

[3] International Renewable Energy Agency (IRENA) (2021). *NDCs and Renewable Energy Targets in 2021: Are we on the right path to a climate-safe future?*. Available at https://www.irena.org/-/media/Files/IRENA/Agency/Publication/2022/Jan/IRENA_NDCs_RE_Targets_2022.pdf. [Accessed on 30/09/23]

In May 2022, the commission published The REPowerEU Plan[4] which puts forwards a set of actions to:

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

It notes that: "*Slow and complex permitting processes are a key obstacle to unleashing the renewables revolution and for the competitiveness of the renewable energy industry*".

The REPowerEU plan also includes an amendment to the Renewable Energy Directive[5] stating: "*Lengthy administrative procedures are one of the key barriers for investments in renewables and their related infrastructure. These barriers include the complexity of the applicable rules for site selection and administrative authorisations for projects, the complexity and duration of the assessment of the environmental impacts of the projects, grid connection issues, constraints on adapting technology specifications during the permit-granting procedure, or staffing issues of the permit-granting authorities or grid operators. In order to accelerate the pace of deployment of renewable energy projects it is necessary to adopt rules which would simplify and shorten permit-granting processes*."

Proposed amendments to the directive made in May 2022 include:

- Renewable energy projects are presumed to be of '*overriding public interest'*
- Increasing the European Union's renewable energy target to 45% by 2030.

In 2021 the EU reached a 22.8%[6] share of its gross final energy consumption from renewable sources which leaves a long way to go to reach this increased target.

In accordance with the REPowerEU Communication in May 2022, the Commission published a recommendation[7] on speeding up permit-granting procedures for renewable energy projects, accompanied by guidance to help the Member States speed up permitting for renewable energy plants.

[4] European Commission (2022). REPowerEU Plan. Available at https://eur-lex.europa.eu/resource.html?uri=cellar:fc930f14-d7ae-11ec-a95f-01aa75ed71a1.0001.02/DOC_1&format=PDF. [Accessed on 30/09/23].
[5] European Commission (2022). Available at https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52022PC0222&from=EN. [Accessed on 30/09/23].
[6] Eurostat (2023). *Renewable Energy Statistics*. Available at https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Renewable_energy_statistics#Share_of_renewable_energy_more_than_doubled_between_2004_and_2020. [Accessed on 30/09/23]
[7] European Commission (2022). Available at https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=PI_COM:C(2022)3219&from=EN. [Accessed on 30/09/23].

The recommendation was created in order to help Member States exploit all possibilities for acceleration that exist within the legislative framework. It proposes measures to streamline procedures at national level, addresses ambiguities in the application of EU legislation and sets out good practices in Member States. It recommends participatory approaches that involve local and regional authorities and providing authorities with the necessary resources so as to facilitate the timely realisation of locally adapted investments.

Recommendations include: "*Member States should ensure that the planning, construction and operation of plants for the production of energy from renewable sources, their connection to the electricity, gas and heat grid and the related grid itself and storage assets qualify for the most favourable procedure available in their planning and permit-granting procedures and are presumed as being in the overriding public interest and in the interest of public safety, in view of the legislative proposal amending and strengthening the provisions of Directive (EU) 2018/2001 related to administrative procedures and without prejudice to the Union law*."

"*Member States should establish clearly defined, accelerated and as short as possible deadlines for all the steps required for the granting of permits to build and operate renewable energy projects, specifying the instances where such deadlines may be extended and under which circumstances. Member States should establish binding maximum deadlines for all relevant stages of the environmental impact assessment procedure*."

On 22nd December 2022 Council Regulation (EU) 2022/2577 laying down a framework to accelerate the deployment of renewable energy was published. It outlines that renewable energy plants, including wind energy, are crucial to fight climate change and pollution, reduce energy prices, decrease the Union's dependence on fossil fuels and ensure the Union's security of supply. The aim of the regulation is to eliminate bottlenecks in new permitting procedures. It notes that considering renewable energy projects as being presumed of overriding public interest and serving public health and safety would allow new projects to benefit from a simplified assessment for specific derogations foreseen in the relevant Union environmental legislation with immediate effect.

It states: "*A fast deployment of renewable energy sources can help to mitigate the effects of the current energy crisis, by forming a defence against Russia's actions. Renewable energy can significantly contribute to counter Russia's weaponisation of energy by strengthening the Union's security of supply, reducing volatility in the market and lowering energy prices*."

The Renewable Energy Directive target increase, and the use of "over riding public interest" in this regulation underlines the vital nature of investments into new renewable energy developments. Although IROPI does not apply to the Development as there are not any adverse effects on the integrity of a European Site, REPowerEU and Regulation 2022/2577 signals a broad support at the EU level to accelerate the deployment of renewable energy sources.

1.6 National Policy

The EU Governance of the Energy Union and Climate Action Regulation 2018/1999 came into force when it was published in the Official Journal of the EU 11 December 2018. It requires Member States to develop integrated national energy and climate plans (NECP) to cover:

1. Security, Solidarity and Trust – Working closely with Member States to diversify Europe's sources of energy and ensure energy security.
2. A fully-integrated internal energy market – Energy should flow freely across the EU, without technical or regulatory barriers. This would enable energy providers to compete freely and promote renewable energy while providing the best energy prices.
3. Energy Efficiency – Improving energy efficiency to reduce the EU's dependence on energy imports, cut emissions and drive jobs and growth.
4. Climate Action – Putting in place policies and legislation to cut emissions, moving towards a low carbon economy and fulfilling the EU's commitments to the Paris Agreement on climate change.
5. Research, Innovation and Competitiveness – Supporting research and innovation in low-carbon and clean energy technologies which can boost the EU's competitiveness.

1.6.1 National Planning Framework

The two relevant policies for consideration in the National Planning Framework (NFP) are 54 and 55, see sections below.

1.6.1.1 National Policy Objective 54

"Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions."

National Policy Objective 54 has been fulfilled by the establishment of national, regional and local policy to facilitate renewables. By demonstrating accordance with these policies, the Development will contribute to the achievement of this national policy objective.

1.6.1.2 National Policy Objective 55

"*Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050."*

The Development is located in an area designated as The Letter Wind Farm Area is located in an 'Available Area' as per the Leitrim County Renewable Energy Strategy 2023-2029[8]. The county assessment included consideration of wind resources, avoiding population centres, accessibility to the electrical grid, the value and sensitivity of the surrounding landscape and avoidance of nature conservation sites in particular Natura 2000 sites (SPA and SAC). The Development has also been assessed under each of the topics contained in the EIAR, with adverse residual environmental impacts actively avoided in line with National Policy Objective 55 of the NFP. It is clear from the findings of the EIAR and the NIS that the Development is located in an appropriate location.

1.6.2 National Energy Security Framework

An Energy Security Emergency Group was established in April 2022 to coordinate and oversee Ireland's response to the Russian invasion of Ukraine. This group, chaired by the Department of the Environment, Climate and Communications, has overseen the development of a new National Energy Security Framework in April 2022.

The National Energy Security Framework coordinates work on energy security across the oil, gas and electricity sectors and sets out a 'whole-of-government' response to energy security including a key focus on energy affordability. It provides a single overarching and initial response to address Ireland's energy security needs in the context of the war in Ukraine. It sets out how Ireland is seeking to phase out dependency on Russian gas, oil and coal imports as soon as possible in order to address the urgent need to secure Irelands energy supply.

It is focused on three areas of work:

- Reducing demand for fossil fuels, which would seek to reduce overall demand for oil, natural gas and coal in Ireland.

[8] Leitrim County Development Plan 2023-2029. Appendix X Part A-Leitrim County Renewable Energy Strategy. Available at https://www.leitrimcoco.ie/eng/services_a-z/planning-and-development/development-plans/15-appendix-x-part-a-leitrim-county-renewable-energy-strategy.pdf. [Accessed on 30/09/23]

- Replacing fossil fuels with renewables, which would seek to reduce the use of gas, oil and coal in Ireland by replacing it with renewable energy sources such as wind energy, solar energy or bioenergy.
- Diversifying fossil fuel supplies, which would seek to replace any Russian supplies of gas, oil and coal (direct or indirect) with supplies from other sources.

The framework highlights the impact of the Russian invasion of Ukraine on energy security, consumer price wise in the short term and how and where energy is sourced to ensure long term system resilience. It notes that:
"The war has highlighted key dependencies in our energy system which can no longer be relied on and has led to affordability issues for many consumers and businesses".

The framework builds on the idea of energy security as the uninterrupted availability of energy sources at an affordable price and is a response to the challenges of ensuring the ongoing and long-term security of affordable energy supply.

Ireland has one of the highest rates of importing fuel in Europe with imported dependency increasing to 80% in 2021 according to the SEAI[9] . Energy demand in Ireland has been growing and is expected to continue to increase, especially electricity demand which is expected to grow by 37% to 2030. Increases to the cost of carbon, supply issues and potential political insecurity increases fossil fuel price volatility. The high rate of imported fossil fuel dependency and the increasing demand for electricity make it vital to introduce more domestic renewable energy generation plants, such as the Letter Wind Farm to provide reliable, secure and affordable energy supplies in Ireland.

The new framework underlines the importance of new renewable energy generation projects, such as Letter Wind Farm, in securing Ireland's energy supply in light of the war in Ukraine and resulting energy supply issues.

1.6.3 Climate Action and Low Carbon Development Act 2021

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).

[9] Sustainable Energy Authority of Ireland (SEAI) (2022). *Energy in Ireland.* Available at https://www.seai.ie/data-and-insights/seai-statistics/key-publications/energy-in-ireland/?gclid=EAIaIQobChMI-LH_o6r8_QIV09_tCh23YAykEAAYASAAEgJipvD_BwE. [Accessed on 30/09/23]

It establishes a framework with clear, legally binding targets and commitments, and ensures the necessary structures and processes are embedded on a statutory basis to achieve Ireland's national, EU and international climate goals and obligations in the near and long term.

The Act includes the following key elements:

- It places on a statutory basis a 'national climate objective', which commits Ireland to pursue and achieve no later than 2050, the transition to a climate resilient, biodiversity-rich, environmentally-sustainable and climate-neutral economy
- It embeds the process of carbon budgeting into law. Government are required to adopt a series of economy-wide five-year carbon budgets, including sectoral targets for each relevant sector, on a rolling 15-year basis, starting in 2021
- Actions for each sector will be detailed in the Climate Action Plan, updated annually
- A National Long Term Climate Action Strategy will be prepared every five years

A recent report from the EPA Ireland's Greenhouse Gas Emissions Projections[10] found that Ireland is not on track to meet the 51 per cent emissions reduction target (by 2030 compared to 2018), indicating that further measures are needed.

1.6.4 The Climate Action Plan 2023

On the 21st December 2022 the Climate Action Plan 2023 (CAP2023) was published to replace the 2021 Plan and sets out a detailed sectoral roadmap designed to deliver a 51% reduction in greenhouse gas (GHG) emissions by 2030 and make Ireland a zero-carbon economy by 2050. The plan sets an ambitious 80% target for electricity production from renewable sources by 2030 and highlights the need to remove barriers to the development of renewables, including onshore wind. It notes that electricity will play an important role in the decarbonisation of other sectors through electrification, including transport, heating, and industry. The goal in the electricity sector is to make Ireland less dependent on imported fossil fuels.

The Plan sets an 80% target for electricity production from renewable sources by 2030 and highlights the need to remove barriers to the development of renewables, including onshore wind. The plan identifies that this will directly reduce emissions but also help with the electrification of other sectors such as transport and heat, reducing emissions in those sectors too. The plan notes that the transition away from fossil fuels and towards locally

[10] EPA 2023. https://www.epa.ie/our-services/monitoring--assessment/climate-change/ghg/

generated renewables will improve energy security and Irelands dependence on imported energy.

The Development will contribute to the de-carbonisation of the Irish electricity network by producing between 16.8MW of renewable electricity, contributing to the Government's 80% renewable electricity target by 2030. This will help to mitigate the impacts of climate change by reducing the emissions related to energy production and will help to decarbonise multiple sectors.

1.6.5 National Energy and Climate Plan 2021-2030

The National Energy and Climate Plan (NECP)[11] is a ten-year integrated document mandated by the European Union to each of its member states in order for the EU to meet its overall greenhouse gases emissions targets.

The ENCP establishes key measures to address the five dimensions of the EU Energy Union:

1) Decarbonisation: GHG emissions and removals and Renewable Energy
2) Energy efficiency
3) Energy security
4) Internal energy market
5) Research, innovation and competitiveness

Key, relevant renewable energy objectives include:

- Ireland has established an objective of achieving a 34% share of renewable energy in energy consumption by 2030.
- Increase electricity generated from renewable sources to 70% (note this target has been increased to 80% in the CAP2023), underpinned by the Renewable Electricity Support Scheme (RESS).
- Streamline consenting and connection arrangements.
- Phase-out of coal and peat-fired electricity generation
- Increase onshore wind capacity by up to 8.2 GW (note increase to 9 GW in the CAP2023)

[11] Department of Communications, Climate Action and Environment. (2021). *National Energy and Climate Plan*. Available at https://energy.ec.europa.eu/system/files/2020-08/ie_final_necp_main_en_0.pdf [Accessed 30/09/23]

Key, relevant energy security objectives include:

- Support efforts to increase indigenous renewable sources in the energy mix, including wind, solar and bioenergy.
- Facilitate infrastructure projects, including private sector commercial projects, which enhance Ireland's security of supply and are in keeping with Ireland's overall climate and energy objectives.

1.6.6 Conclusions

The Development will contribute 16.8MW towards Ireland's legally binding targets in the Climate Act and Low Carbon Development Act to reduce greenhouse gas emissions 51% by 2030 and achieve net-zero by 2050 by displacing fossil fuels. This also assists in improving energy security in line with the National Energy Security Framework in light of the war in Ukraine. The Development supports the target of doubling of onshore wind energy generation in Ireland by 2030 and contributes to the nation's target increase of renewable electricity from 30% to 80% by 2030 as set out in the Climate Action Plan 2023. Through the review of policy and legislation (in this section), it has been shown that the Development is firmly in the Irish national interest and is of strategic importance.

1.7 Regional Energy Policy

The Local Government Reform Act 2014 provided for the dissolution of the eight regional authorities and two regional assemblies and for their replacement with three new regional assemblies. The three new regional assemblies were established in 2015 representing the Northern and Western, Eastern and Midland and Southern Regions. Members of the Regional Assemblies consist of the local authorities within that region.

The Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region, adopted on the 24th January 2020, provides a long-term regional level strategic planning and economic framework, to support the implementation of the National Planning Framework, for the future physical, economic and social development for the Northern and Western Region.

The RSES highlights the challenges the region will face with the changing climate and emphasises the importance of producing renewable energy to tackle climate change, meet predicted growth in demand and provide energy security. The RSES recognises that the region has a huge potential for growth of renewables and supports opportunities for onshore wind. It recognises renewable energy as an important contributor to the economy and employment in the region. Key policies are in **Table 1.1**.

Table 1.1: Key Planning Policy Objectives from the RSES

Policy no.	Policy Details	Development contribution
RPO 4.16	The NWRA shall co-ordinate the identification of potential renewable energy sites of scale in collaboration with Local Authorities and other stakeholders within 3 years of the adoption of the RSES. The identification of such sites (which may extend to include energy storage solutions) will be based on numerous site selection criteria including environmental matters, and potential grid connections.	The Wind Farm Site is designated in an 'Available Area' for wind farms as per the Leitrim Renewable Energy Strategy 2023-2029.
RPO 4.18	Support the development of secure, reliable and safe supplies of renewable energy, to maximise their value, maintain the inward investment, support indigenous industry and create jobs.	The Proposed Development will locally produce a reliable and safe supply of renewable energy. The Developer is an Irish company, focused on producing renewable energy in the west of Ireland. The Proposed Development will create jobs during construction, operation and decommissioning.
RPO 8.1	The Assembly support the development of a safe, secure and reliable electricity network and the transition towards a low carbon economy centred on energy efficiency and the growth projects outlined and described in this strategy.	The Proposed Development will contribute to the regions electricity network by producing renewable low carbon electricity.

The RSES sets the framework for the County Development Plans, in this case the Leitrim County Development Plan 2023-2029. Both plans highlight the vital importance of a reliable energy supply, increasing renewable energy in line with regional and national targets and the need to transition to a low carbon economy and society.

1.8 Summary of Need for Development and Compliance with International, National, Regional policies

The Russian invasion of Ukraine and resulting energy supply issues combined with Ireland's heavy dependence (80% in 2021)[12] on imported energy makes it imperative that renewable, domestically produced energy is increased. This is reflected in the REPowerEU Plan, Council Regulation to accelerate the deployment of renewable energy and the National Energy Security Framework.

The National Energy and Climate Plan 2021-2030 and the Climate Action Plan (CAP) 2023 sets out a target for 80% electricity to come from renewable sources by 2030. In 2021 this was at 35% so there is a high demand for new renewable energy sources to achieve this target. Decarbonisation and energy security are also key objectives of both the National Energy and Climate Plan 2021-2030 and CAP2023.

The CAP2023 sets a target of increasing onshore wind to 9 GW by 2030 and a target of 6 GW by 2025. As of May 2022, this was 4.3 GW[13], leaving a shortfall of 4.7 GW to be achieved in 8 years. The Development will contribute 16.8MW of renewable, domestically produced wind energy, helping Ireland to reduce emissions, improve energy security and achieve renewable electricity targets.

The Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region recognises and supports opportunities for onshore wind as a major source of renewable energy with an important role in delivering value and clean electricity for Ireland. Therefore, the Development supports the national and regional policies focusing on onshore wind generation as a central pillar to increase Ireland's energy self-sufficiency.

[12] SEAI. (2022). Energy in Ireland 2022. Available at https://www.seai.ie/publications/Energy-in-Ireland-2022.pdf. [Accessed 01/10/23]
[13] Wind Energy Ireland. (2022). *Wind Stats*. Available at https://windenergyireland.com/about-wind/the-basics/facts-stats. [Accessed 01/10/23].

2 DEVELOPMENT PLAN POLICY APPRAISAL

2.1 Leitrim County Development Plan 2023-2029 Assessment

The Wind Farm Site is entirely located in County Leitrim. The current Leitrim County Development Plan (LCDP) is the 2023-2029 plan. It sets out the strategic framework for sustainable planned economic and social development in the county. The plan strongly emphasises the urgent and pressing issue of climate change and the impacts it will have on County Leitrim and its people. It underlines the critical need to phase out fossil fuels and provide safe, secure and renewable electricity supply to enable sustainable economic growth.

The LCDP recognises Leitrim's abundance of natural resources that can be harnessed in a sustainable manner without negatively impacting the environment. There is a potential for a range of renewable energy technologies to be utilised throughout the county including:

- Wind energy
- Solar energy
- Bioenergy (biomass, biogas, biofuel)
- Geothermal energy
- Hydropower
- Waste-to-energy

The development of a climate resilient county transitioning towards low carbon use across a multitude of sectors of society is an overarching strategic outcome of the LCDP.

The plan recognises that the potential for renewable energy in Leitrim is dependent on the abundance of the natural resource in addition to environmental and infrastructural constraints and facilitators. Renewable technologies such as wind energy will play an increasing role in the future in the drive to reduce greenhouse gas emissions and transition to a low carbon society.

County Leitrim has a long-standing record of promoting and accommodating the development of wind renewable energy technologies, principally wind energy, with the county containing excellent wind resources and grid infrastructure. This has been to the benefit of the local economy in terms of jobs sustained by the industry, either in construction or operational terms, but also in fostering the sustainable credentials of Co. Leitrim as a forward-looking, progressive and environmentally conscious county.

To facilitate the growth of renewable energy technologies within the county, Leitrim County Council have prepared a Renewable Energy Strategy (RES) as part of the County

Development Plan (Appendix IX of the LCDP). The overall aim of the strategy is to provide a plan-led approach to renewable energy development in County Leitrim and is underpinned by the following vision:

"To encourage and support the transition of Leitrim to a carbon neutral county through community engagement, energy efficiency and the sustainable development of renewable energy, whilst providing environmental and economic benefit at a local and national level and preserving the cultural heritage and visual amenity of the county".

The LCDP notes Leitrim's existing connected wind energy (2021) as 92MW, with an additional indicative capacity of 83MW up to 2030 (90% increase of existing). This results in a total operational output in 2030 of 175MW. These figures highlight the need for renewable energy projects such as Letter Wind Farm to make a meaningful contribution to achieving these goals.

Key policies from the Leitrim County Development Plan are shown in **Table 2.1.**

Table 2.1: Key Planning Policies from The Leitrim County Development Plan 2023 – 2029

Policy No.	Policy Details	Development contribution
CS OBJ 19	To ensure that development is promoted, supported or facilitated through the County Development Plan that provides for climate action including that related to the increased risk of flooding and the promotion of sustainable transport options and renewable energy where possible to achieve a successful transition to a low carbon economy.	The Development will produce 16.8MW of renewable energy that will support Leitrim's transition to a low carbon economy.
EC DEV POL 2	To continue to promote the county to attract enterprise and investment through the Economic Development Department and the Local Enterprise Office, with a focus on a number of established and emerging sectors including tourism, manufacturing, renewable energy, ICT, food and agri-food and to maximise the opportunities afforded by remote working.	The Development represents a major investment in the county and in renewable energy. It will provide an improved renewable electricity supply in the county. This could attract new enterprise to the county, bringing jobs, economic growth and population increases. The increased renewable electricity supply will also help to meet increased demand to facilitate further economic growth.
EV POL 2 To	To support the Government's Electric Transport Programme to increase the usage of Electric Vehicles with support facilities, through a roll-out of additional electric charging points in collaboration with relevant agencies at appropriate locations. (See also ST POL 2 in Chapter 12 - Climate Action and Renewable Energy in this regard)	By providing renewable energy, the Proposed Development further improves the environmental impact of an increase in electronic vehicle use. It also increases the stability of energy supply to meet the growing demand of increased electrification.
ENI POL 2	To co-operate and liaise with statutory and other energy providers in relation to power generation in order to ensure that the energy	The Development will have capacity to produce 16.8MW of renewable energy thus assisting in providing for future

Policy No.	Policy Details	Development contribution
	needs of future population and economic expansion within designated growth areas and across the wider region can be delivered in a sustainable and timely manner, which minimises impacts on environmental sensitive and high visual quality areas and that capacity is available at local and regional scale to meet future needs.	populations and economic growth in County Leitrim. Environmental impacts are assessed throughout the EIAR, with **Chapter 11: Landscape and Visual Amenity** specifically assessing potential visual impacts.
RUR ECON OBJ 3	To develop and support sustainable and economically efficient rural economies enhancing sectors such as agricultural and food, forestry, fishing and aquaculture, energy and extractive industries, the bio-economy, renewable energy, tourism, outdoor recreation and creative arts sector and facilitating diversification into alternative on-farm and off-farm activities, while protecting the natural landscape and built heritage.	The Development is located in a rural landscape and will bring economic development and diversification to the local area. The project will create employment opportunities during the construction, operational and decommissioning phases.
CA POL 1	To support the implementation of the European, national, regional and local objectives for climate adaptation and mitigation detailed in Section 12.2.2 and Section 12.2.3 of this Plan.	These policies all consider increasing renewable energy to be key to mitigating climate change. As the Development relates to the generation of renewable electricity through the use of natural resources, namely wind energy, it will contribute to mitigating climate change.
CA POL 2	To support the transition of the county towards a competitive, low carbon, climate resilient and environmentally sustainable economy by 2050 by providing for consolidated development forms which facilitate the reduction of energy demand and greenhouse gas	The Development will provide renewable electricity through the harnessing of renewable resources (wind energy). This Development will assist Ireland in making a meaningful

Policy No.	Policy Details	Development contribution
	(GHG) emissions, and which supports sustainable travel patterns in line with the Core Strategy.	contribution to the transition to a low carbon and climate resilient economy by 2050.
RE POL 1	To encourage and facilitate the production of energy from renewable sources, such as from wind, solar, bioenergy, hydroelectricity, and geothermal, subject to compliance with proper planning and environmental considerations.	The Development will have a capacity to produce 16.8MW of renewable wind energy. This Planning Statement demonstrates the Development is compliant with International, European and National policy on energy security, emissions reductions and renewable energy production. It reviews policy for the Northern and Western region and local Leitrim County policy and finds the Development complies with key renewable energy, landscape and environmental policy objectives. The Development has been assessed under each of the topics contained in the EIAR, with adverse residual environmental impacts actively avoided. No significant negative impacts to the environment have been identified.
RE POL 2	To promote and support developments and actions that assist in achieving the national targets for energy from renewable resources and reducing greenhouse gas emissions associated with energy production.	The renewable energy produced by the Development will offset fossil fuels used in energy production, reducing the greenhouse gas emissions in line with national targets.
RE POL 3	To ensure environmental assessments for new energy developments should address reasonable alternatives for location. Where existing infrastructural assets such as substations, powerlines and roads already exist within proposed development	An assessment of reasonable alternatives was undertaken as part of the Environmental Impact Assessment (EIA) and is examined in more detail in **Chapter 3: Alternatives Considered**. The Development will utilise existing access tracks within the

Policy No.	Policy Details	Development contribution
	areas, then such assets should be considered for sustainable use by the proposed development where the assets have capacity to absorb the new development.	footprint of the Site. The Turbine Delivery Route from Killybegs Harbour was chosen as the preferred option as it has proven successful for the delivery of turbine components for other wind farms in County Leitrim.
RE OBJ 1	To seek to achieve a minimum of 200 MW of renewable electricity in the county by 2030, by facilitating renewable energy developments, including micro-generation renewable technologies incorporating solar, wind, hydro-electric and bioenergy.	The Development will have a capacity to produce 16.8MW of renewable wind energy. This will assist in Ireland achieving this target.
WE POL 1	To acknowledge the importance of wind energy in Co. Leitrim as a renewable energy source which can play a vital role in achieving national targets in relation to reductions in fossil fuel dependency and therefore greenhouse gas emissions	The Development will have a capacity to produce 16.8MW of renewable wind energy, displacing fossils fuels and therefore reducing greenhouse gas emissions.
WE POL 2	To encourage the development of wind energy in suitable locations and in an environmentally sustainable manner to ensure the security of energy supply, in accordance with Government policy and the Leitrim County Renewable Energy Strategy (2021).	The Development will have a capacity to produce 16.8MW of renewable wind energy which will improve the security of Leitrim's energy supply, helping to stabilise and reduce energy prices. The Development is located in an '*Available Area'* as per the Leitrim County Renewable Energy Strategy 2023-2029. The Development has been assessed under each of the topics contained in the EIAR, and it has been found to be in a suitable location.

Policy No.	Policy Details	Development contribution
WE POL 3	To ensure that the assessment of wind energy development proposals will have regard to the following:	The impacts have been assessed in the following chapters:
	• sensitivities of the county's landscapes • visual impact on protected views, prospects, designated landscapes, as well as local visual impacts	• **Chapter 11: Landscape and Visual Amenity**; sensitivities of the county's landscapes, protected views, prospects, designated landscapes, as well as local visual impacts
	• impacts on nature conservation designations, archaeological areas, county geological sites, historic structures, public rights of way and walking routes	• **Chapter 5: Terrestrial Ecology, Chapter: 6 Aquatic Ecology, Chapter 7: Ornithology, Chapter 8: Soils and Geology, Chapter 14: Cultural Heritage**
	• local environmental impacts, including those on residential properties, such as noise and shadow flicker	• **Chapter 4: Population and Human Health**
	• visual and environmental impacts of associated development, such as access roads, plant and grid connections from the proposed wind farm to the electricity transmission network	• Assessed throughout chapters 2-16

Policy No.	Policy Details	Development contribution
	• scale, size and layout of the project and any cumulative effects due to other projects • the impact of the proposed development on protected bird and mammal species	• Cumulative assessments are undertaken throughout chapters 2-16 • **Chapter 5: Terrestrial Ecology, Chapter: 6 Aquatic Ecology, Chapter 7: Ornithology**
WE OBJ 1	To secure the maximum potential from the wind energy resources of Co. Leitrim commensurate with supporting development that is consistent with proper planning and sustainable development of the area.	The Proposed Development will have a capacity to produce 16.8MW of renewable wind energy. This Planning Statement sets out how the Development is consistent with proper planning and sustainable development of the area.

2.2 Leitrim County Development Plan 2023-2029 Renewable Energy Strategy

The aim of the Leitrim County Renewable Energy Strategy 2023-2029 is to provide a plan-led approach to renewable energy development in Leitrim. The plan notes that the demand for energy at a global, national and local level is constantly increasing and that meeting this demand is a challenge to do in a secure, sustainable and efficient manner. It emphasises that this demand cannot be met by fossil fuels alone due to the widely acknowledged impacts of global climate change. The plan highlights that renewable energy developments can bring economic, social and environmental benefits, such as job creation, decreased import dependency and reduced greenhouse gas emissions. It also notes that renewable energy can be limited by landscape and visual impacts, the availability of supporting infrastructure and competition for land-use. The plan is described as being vital in order to harness Leitrim's natural resources in a way that is economical and sustainable.

The vision for renewable energy is:
'*To encourage and support the transition of Leitrim to a carbon neutral county through community engagement, energy efficiency and the sustainable development of renewable energy, whilst providing environmental and economic benefit at a local and national level and preserving the cultural heritage and visual amenity of the county.'*

The strategy highlights that Leitrim's abundant natural resources can be harnessed without negatively impacting the environment and that Leitrim has an opportunity to become exporters of electricity. It also notes that Leitrim has a 3% higher residential consumption of energy than the national average due to the generally older and less well insulated housing stock, that are highly reliant on oil as a fuel source and have lower BER ratings. This explains the larger percentage of energy consumed by the residential sector in Leitrim compared to 24% consumed by the sector annually.

Section 6.1 of the strategy provides an overview of the renewable energy types with a key focus on wind energy. Wind energy is the largest contributor to total renewable energy generation in the county with 13 operational wind farms giving an installed capacity of 92.9MW. It also notes however that the main constraining factors to future wind development are sensitive ecological sites, a rich cultural heritage and high-quality landscapes. Potential impacts on ecology are assessed in the biodiversity chapters, namely **Chapters 5,6** and **7**, and in the accompanying Appropriate Assessment, cultural heritage is assessed in **Chapter: 14,** with **Landscape and Visual Amenity** assessed in **Chapter 12.**

As part of the Renewable Energy Strategy, a mapping exercise was undertaken to determine wind energy availability in County Leitrim. The outcome of this mapping exercise is displayed in **Figure 2.1.**

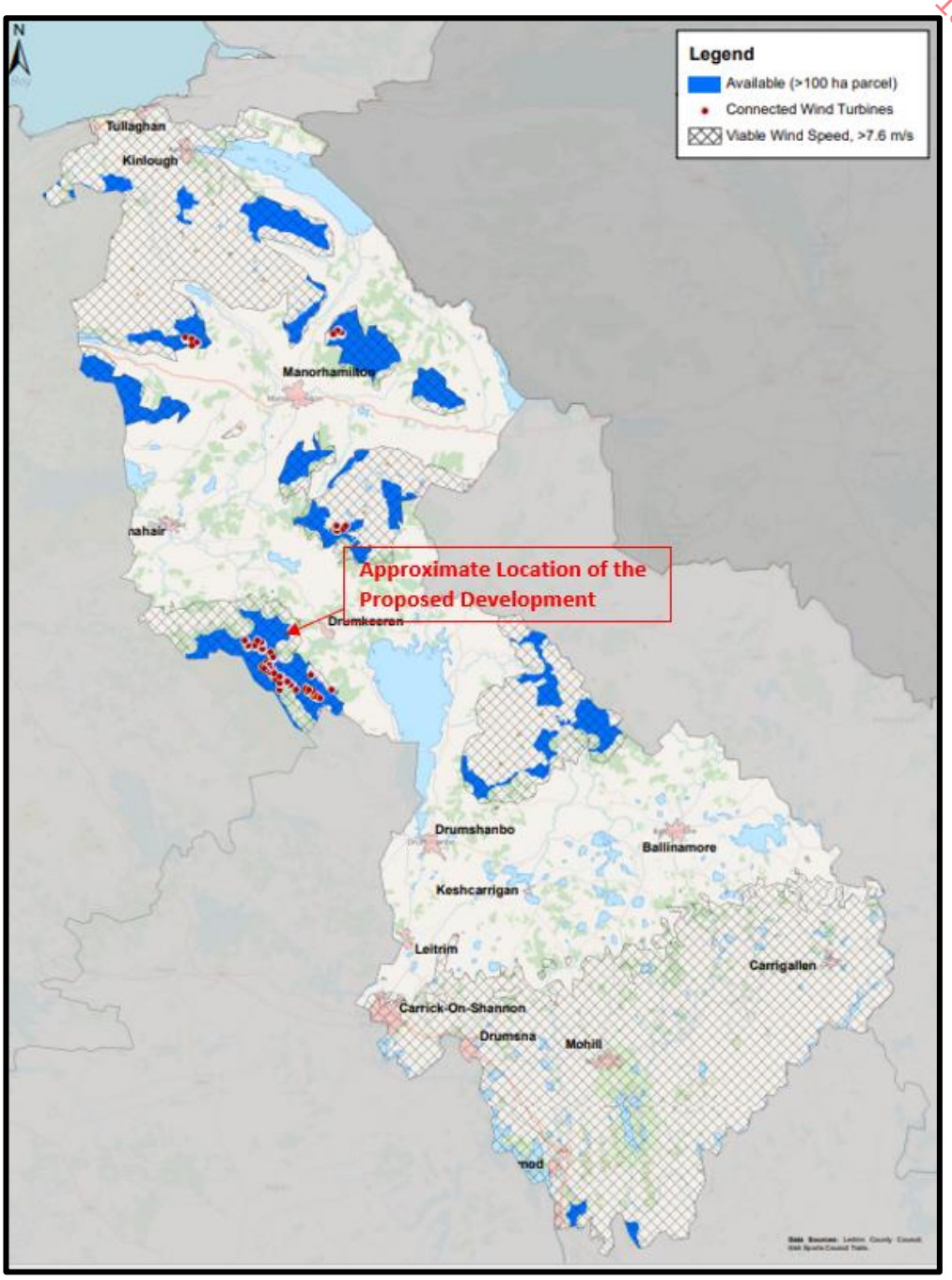

Figure 2.1: Extract from Appendix B Onshore Wind-Sensitivity Analysis-Available Areas

As displayed in **Figure 2.1,** it appears that the Development lies within an '*Available Area'* as per Figure 6.3 (b) in Appendix B of Leitrim's Renewable Energy Strategy.

The capacity study concludes that although scope for future wind energy development in the county would be limited, each planning application for proposed development of this kind would need to be judged individually on its own merits, especially in terms of landscape and visual impact.

The strategy notes '*Having combined the technical and mapping analysis (Step 1) and the Landscape and Visual Capacity Assessment (Step 2), opportunities for new wind farm are limited. There are no areas where new wind turbines would be considered 'acceptable in principle.'*

Key Planning Policies from the Leitrim County Renewable Energy Strategy 2023-2029 are shown in **Table 2.2.**

Table 2.2: Key Planning Policies from the Leitrim County Renewable Energy Strategy 2023-2029

Policy No.	Policy Details	Project contribution
Objective W1	Promote appropriate wind energy development in Leitrim.	The Development will have an installed capacity of 16.8MW of renewable, domestically produced wind energy in Leitrim. The site location has been selected for its excellent wind resource and minimal environmental impacts, which have been assessed throughout this EIAR.
Policy W1.1	Proposals for onshore wind farm developments will be determined in accordance with the Wind Energy Development Guidelines and County Development Plan policy framework.	The Development meets the requirements set out in the 2006 Wind Energy Guidelines and the policies in the Leitrim County Development Plan as set out in section 4.5.2.
Policy W1.3	Support community led wind energy developments or developments with innovative models for community ownership.	The Development includes local owners and will contribute to the local community.

2.3 Conclusions of the Development Plan Policy Appraisal

The Development's contribution of 16.8MW of renewable electricity supports investment in sustainable energy production and associated infrastructure in County Leitrim and is in line with the overarching principles of the Leitrim County Development Plan. The Development will also provide jobs, economic development and, in conjunction with the community benefit fund, will result in positive socio-economic impacts. Which is also in line with the objectives of the Leitrim County Development Plan.

The Development also meets the requirements of the Development Plan to not have adverse impacts on the surrounding environment, including water quality, landscape, biodiversity, or amenities.

It should be noted that the Development complies with the '*Planning Guidelines for Wind Farm Development 2006*' and has had regard to the '*Draft Wind Energy Development Guidelines 2019'*. In this regard to achieve the goal of maximising the potential for wind energy development in pursuance of national targets for renewable energy, the Wind Energy Guidelines highlight that securing community and therefore public acceptance of wind energy is important.

Ireland is in a climate crisis and the establishment of low carbon economies through increased renewable energy generation is now a time-critical consideration underpinning the development of the Country as a whole. This issue is emphasised in the Leitrim County Development Plan. Climate Action and Renewable Energy is included in Chapter 12 in the LCDP. By displacing fossil fuels with renewable wind energy, the Development contributes towards the policies in these chapters. In addition to the Development's contribution to achievement of the national climate targets, it also offers potential key capacity to address recent issues identified in relation to security of electricity supply. Energy security is of vital importance, particularly considering the ongoing geopolitical conflicts. The Development represents an opportunity to make a meaningful contribution to Ireland's energy security.

3 KEY ENVIRONMENTAL MATTERS

3.1 Introduction

The planning application should be considered on the basis of the proper planning and sustainable development of the area including the likely effects of the Development on the environment.

3.1.1 Landscape

The Landscape and Visual Impact Assessment (LVIA) in **Chapter 12** of the EIAR assesses the impacts of the Development in relation to the Leitrim County Development Plan.

The Development is wholly located in LCA11 – Corry Mountain. In respect of landscape sensitivity designations, the Site is located within LCT 6 – Moorland Hills, although the landscape a short distance to the west of the site transitions to LCT 5 – Moorland Plateau, whilst a short distance east of the site, the lower terrain transition to LCT 8 – Valley Farmland. The landscape sensitivity of the central study area is deemed medium-low due to its robust working character, which is heavily influenced by existing wind energy developments. Regarding the wider study area, it is considered the landscape of this study area is highly complex and richly diverse in terms of sensitivities and landscape values. An overall landscape sensitivity judgement of Medium is deemed appropriate for the landscape of the wider study area.

In terms of landscape effects, there will be physical impacts on the land cover of this already modified (by commercial forestry plantations) Site during the construction stage, but many of these will be reversible upon decommissioning of the site. The main landscape impacts relate to changes in landscape character during the operational stage principally from the presence of the proposed turbines. In terms of scale and function, the proposed wind farm is considered a relatively modest four-turbine development that does not appear out of place in terms of its scale or function in this transitional upland landscape context. It will almost always be viewed in combination with other existing wind farm developments and therefore represents the intensification of an established land use instead of a new and unfamiliar one. Furthermore, it is considered an appropriately sited development and is not at odds with the working upland character of the surrounding landscape.

Based on the landscape, visual and cumulative assessment detailed within Chapter 12, it is considered that there will not be any significant effects arising from the proposed Letter Wind Farm. For these reasons and the details given in the landscape chapter, the Development has been assessed as being compliant with the Leitrim County landscape policy as outlined in the CDP.

3.1.2 Biodiversity

EIAR **Chapters 5**, **6**, and **7** assesses the potential impacts and effects of the Project on biodiversity. Surveys were carried out to identify and evaluate the importance of ecological features present within the study area. There are no sites designated for nature conservation within the Site and as such the proposed Project only poses a risk of indirect effects on such sites.

The Appropriate Assessment has identified five European Sites within the Zone of Influence (ZoI) of the Project. In addition, the Owengar Woods pNHA has been identified as occurring within the ZoI of the Project owing to its proximity to the turbine delivery route widening locations no. 4, 5 and 6. However, it is noted that there are no hydrological pathways connecting these widening locations to this pNHA. The mitigation measures set out in the Biodiversity chapters of the EIAR, in the Construction Environmental Management Plan (CEMP) and the Natura Impact Statement (NIS) will ensure that there will be no effects on sites designated for nature conservation as a result of the Project.

Loss and disturbance of habitats will be the principal adverse ecological effect of the Development. A Habitat Management Plan will be implemented as part of the Development to mitigate for the loss of habitat to the footprint of the proposed wind farm. This plan comprises measures for the restoration and enhancement of an area of approximately 19ha of peatland habitat and will be implemented during both the construction and operational phases.

The Project will have the potential to result in the direct loss of potential breeding habitat for some passerine species such as ground-nesting species including skylark and meadow pipit in modified blanket bog and others such as linnet and goldcrest in conifer plantation. However, given the small scale of habitat loss to the footprint of the project in the context of the surrounding area of suitable breeding habitat for these species this loss is assessed as being imperceptible and will represent an impact of negligible magnitude.

With the full implementation of all mitigation measures set out in this Chapter, and particularly construction phase mitigation for breeding birds of peatland habitats, as well as measures for Kestrel (as required) during operation phase, it is considered that the significance of the predicted effects on birds as a result of the proposed Development will range from Imperceptible to Moderate. Whilst loss of peatland habitat will reduce the area of suitable breeding habitat available for species such as meadow pipit (species of high conservation concern) and skylark, it is not expected that this will have an adverse residual effect as the

loss is a relatively small amount of the available peatland habitat on site. Also, the Habitat Enhancement Plan will mitigate the loss of peatland habitat. Similarly, the relatively small amount of habitat loss as a result of the development is not expected to have any residual impact on species which use the site for feeding and/or roosting, including Kestrel. The construction phase of the Project may result in disturbance to breeding birds within a distance of up to 500 m of the works boundary. With mitigation in place, comprising the use of work restrictive zones around identified nests areas, the Project is not expected to have any residual impact on these species.

3.1.3 Residential Amenity

A significant minimum separation distance from all occupied dwellings of 710m has been achieved with the Project design in line with the 2006 Wind Energy Guidelines. There are 17 dwellings within a 1.5km radius of the proposed turbines, comprising one off houses and farm holdings.

The shadow flicker assessment has identified the potential for shadow flicker to affect a number of receptors within the shadow flicker study area. This will be mitigated using a shadow control system, installed on all turbines to reduce the potential for shadow flicker from the Development.

This brings the development in line with the DoEHLG 2006 Guidelines limit (30 hours per year or 30 minutes per day). The Development can be brought in line with the requirements of the 2019 draft guidelines, should they be adopted while this application is in the planning system, through the implementation of the mitigation measures.

The main sound heard from wind turbines is the 'swish' from the movement of the blades through the air. Modern turbines are designed to minimise noise and planning conditions are used to ensure compliance with specified noise limits. **Chapter 11** assesses noise and vibration, it shows that noise due to the Project, including cumulative effects with operational and consented wind farms will meet all the 2006 Wind Energy Guidelines at all local properties.

4 ECONOMIC IMPORTANCE OF THE DEVELOPMENT

The Project would represent a strategically significant investment in the locality of Leitrim and the wider region. The Project will provide a multi-million euro benefit to both the Irish and local economies. The Project provides the opportunity to reinforce the existing local renewable energy industry knowledge and skills base, providing the stability and diversity to the rural economy that can stimulate further industry investment to take place.

The influence of the Project to the de-carbonisation of the electricity network will contribute positively to an issue of strategic social importance. This is illustrated by the text of the Irish government's recent Climate Action Plan 2023 which sets an ambitious 80% target for electricity production from renewable sources by 2030 and highlights the need to remove barriers to the development of renewables, including onshore wind, such as streamlining regulation and encouraging reinforcement of the grid to facilitate greater renewables penetration. The significance of the action plan is underlined by the Irish government's recent declaration of a climate emergency.

The RSES recognises and aims to support the many opportunities for wind as a major source of renewable energy. It declares that opportunities for both commercial and community wind energy projects should be harnessed, having regard to the requirements of the 2006 DoHPLG Guidelines on Wind Energy.

As a form of sustainable energy, and with an output level of up 16.8MW, the Development will contribute to the renewable energy targets in County Leitrim and in the Northern and Western Regional Assembly area.

The Development will be a significant regional project providing a sizable economic benefit through local investment, employment, local authority rates, and a local community benefit funds in accordance with Government, regional and local planning policies.

Wind Energy Ireland produced a report on The Economic Impact of Onshore Wind in Ireland[14] below which illustrated that the onshore wind industry in 2020 supported over 5000 jobs and by 2030 there is a potential to increase this to over 7000, as shown **Figure 4.1**. The report also outlines the current benefits of onshore wind along with how far Ireland has to go to reach binding targets. Note that the installed capacity needs to nearly double within in a ten-year period.

[14] Wind Energy Ireland (WEI) (2021). *Economic Impact of Onshore Wind in Ireland.* Available at https://windenergyireland.com/images/files/economic-impact-of-onshore-wind-in-ireland.pdf. [Accessed on 05/10/23]

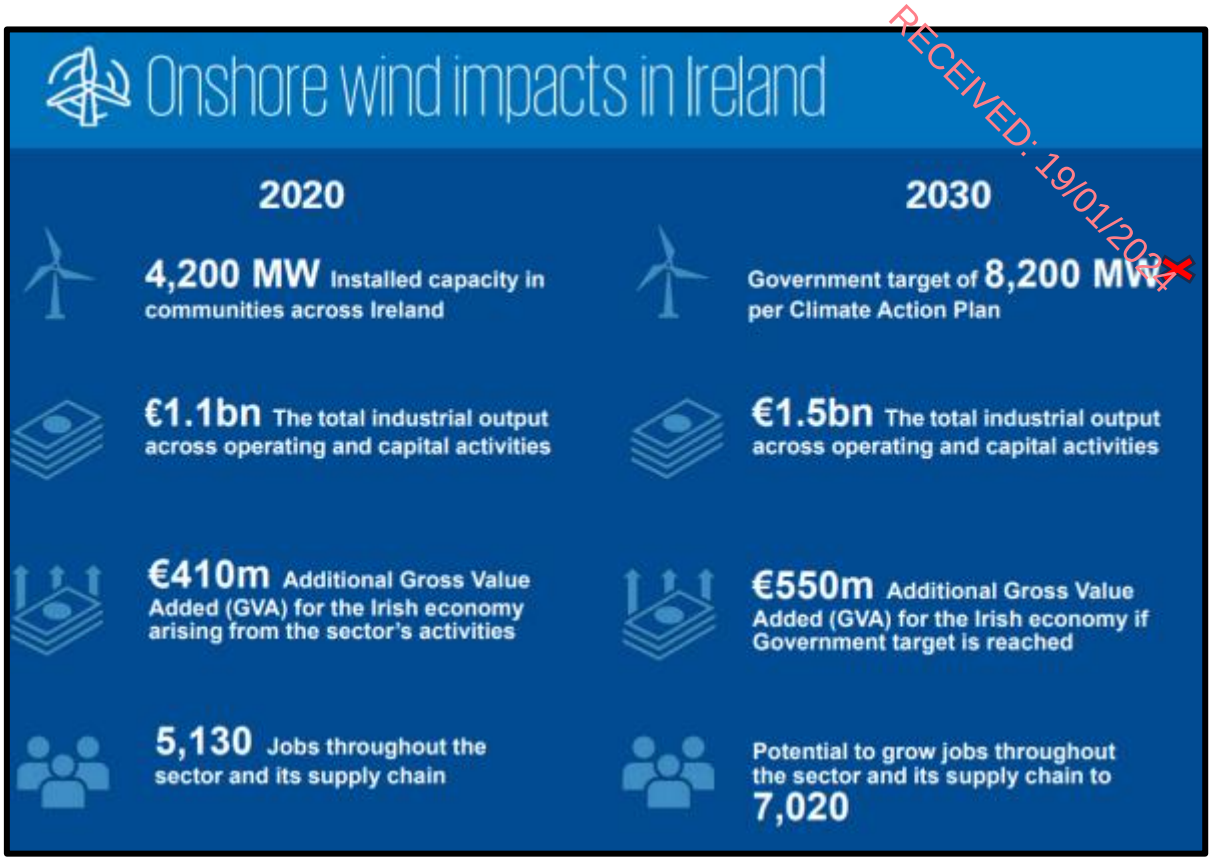

Figure 4.1: Onshore Wind Impacts in Ireland (excerpt from the Economic Impact of Onshore Wind in Ireland) (With the publishment of the Climate Action Plan 2023, the Government target for onshore wind has now increased to 9,000MW)

The construction of the Development will positively contribute to the regional economy bringing investment and jobs that will help to support and retain confidence in the key regional industries of construction and renewable energy. This is assessed in **Chapter 4: Population and Human Health.**

5 THE DEVELOPMENT AS A SUSTAINABLE DEVELOPMENT

Sustainable Development is development which meets the needs of the present without compromising the ability of future generations to meet their own needs[15]. There are three pillars to sustainable development which are economic, social and environmental. The Project is an excellent example of sustainable development, enshrined in the National Planning Framework. The Project meets each of the three pillars of sustainable development as outlined in **Table 5.1.**

Table 5.1: How the Development Interacts with the three pillars of sustainable development

Economic Role	The Project would represent a strategically significant investment in the locality. The Project provides the opportunity to reinforce and grow the existing local renewable energy industry knowledge and skills base, providing the stability and diversity to the rural economy that can stimulate further development by attracting new business to the region due to the improved supply of electricity. The Project will have a positive economic impact with several Irish firms commissioned to work on the design, environmental assessment and planning. The construction and operational phases will also create jobs locally and nationally and will lead to further economic development. The Project represents a strategically significant investment in the locality
Social Role	The influence of the Project to the de-carbonisation of the Irish electricity network will contribute positively to an issue of strategic social importance. This is illustrated by the Climate Action Plan 2023 which sets an 80% target for electricity production from renewable sources by 2030 and highlights the need to remove barriers to the development of renewables, including onshore wind, such as streamlining regulation and encouraging reinforcement of the grid to facilitate greater renewables penetration. The significance of the action plan is further underlined by the Irish government's recent declaration of a climate emergency. The deployment of modern, efficient wind turbine technology, which is currently the cheapest form of new generation, will also contribute to reducing the cost of energy and benefit Irish consumers through lower energy prices.

[15] United Nations (1987). *Report of the World Commission on the Environment and Development.* Available at file:///C:/Users/sconlon/Downloads/our_common_futurebrundtlandreport1987.pdf. [Accessed on 05/10/23]

	The Project has the potential to bring significant positive benefits to local communities. It will support sustainable local employment; it will contribute annual rates between €218,000 to €252,000 to the local authority; and it will provide opportunity for local community investment in the project in line with the new Renewable Energy Support Scheme (RESS). This is a Government of Ireland initiative that provides support to renewable energy projects in Ireland. A Community Benefit Fund will be put in place for the RESS period (i.e., 15 years of the operation) of the Project to provide direct funding to those areas surrounding the Project. The significant annual community benefit fund will be established in line with Government policy which will include funding for both wider community initiatives and a Near Neighbour scheme focused on houses in close proximity to the Project. The additional renewable energy that the Project will generate will help support Ireland's wider low carbon transition. It will help to meet the additional electrical demand that will be created by the electrification of the transport and heating networks and the growing tech industry installations such as data centres.
Environmental Role	The Project has been assessed by the EIA process in terms of its impact on the environment, where impacts have been identified, the design has been amended and mitigation implemented to avoid, prevent and reduce adverse impacts and maximise positive impacts. Approximately 17,925 tonnes of carbon dioxide will be displaced per annum by the Development. This will help to mitigate climate change and will have a positive impact on the environment. The Habitat Management Plan will be implemented to mitigate for the loss of habitat to the footprint of the proposed wind farm. This plan comprises measures for the restoration and enhancement of an area of approximately 19ha. This plan will provide increased diversity of species, habitat connectivity and ecological links with the wider landscape.

The Project has been conceived and designed to align within the planning and sustainable development objectives of the local area. The success of this is documented in

comprehensive detail through the EIAR and illustrated in **Table 2.1** which shows accordance with the provisions of the Leitrim County Development Plan.

The application documents and EIAR show that the Development provides an excellent opportunity to stimulate continued and additional investment to maximise beneficial impact towards national targets, while also minimising the resulting environmental effects.

6 CONCLUSION

The Project will contribute to Ireland's indigenous renewable energy generation, which, in the context of the ongoing climate emergency, is an urgent Irish national priority that must be given significant weight based on national and international policies.

Ireland faces significant challenges to its efforts to meet EU and national legally binding targets for renewable energy by 2030, and its commitment to transition to a low carbon economy by 2050. The Irish government has committed to increasing the share of renewables electricity up to 80% by 2030 and targeting 9 GW of onshore wind by 2030. The Development will sustain and contribute (between 28 - 33 MW) towards Ireland's legally binding targets for reductions in CO_2 and produce energy from native and renewable resources.

It is concluded in this planning statement that the Project fully accords with International policies, National Planning Policy, Regional Planning Policy and the Leitrim County Development Plan policies and objectives. In this regard, the Development:

- Is in an area designated "Open to Consideration" for Wind Farms in Leitrim;
- Contributes 16.8MW of renewable wind energy to the national CAP2023 target of 9GW by 2030, helping to reduce the current 4.7GW shortfall;
- Contributes to the 45% overall renewable energy target by 2030 for the EU introduced by the RePowerEU plan in light of the war in Ukraine;
- Contributes to assisting Ireland to increase from 42% electricity produced by renewable sources in 2020 to 80% by 2030 to meet the national target;
- Complies with the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly's goal of prioritizing action on climate change across all strategic areas and in all economic sectors;
- Supports the local Leitrim County Development Plan policy of increasing energy security and promoting renewable energy;

- Aligns with Leitrim County Development Plans' requirements with respect to water quality, landscape, biodiversity or amenities, and
- Contributes to rural economic development in line with the Leitrim County Development Plan.

The development process adopted by the Applicant has represented a best practice approach to a renewable energy scheme design, minimising the potential impact on the receiving environment through multiple design iterations. The proposed layout represents the optimum fit with the technical and environmental parameters of this project and this site. Furthermore, the embedded mitigation, mitigation by avoidance and reduction and compensation through management and restoration of degraded habitats as outlined in the EIAR, CEMP and Habitat Management Plan are considered to adequately mitigate the predicted environmental effects.

Overall, it is considered that the Project aligns with international, European, national and local policy.