2. BACKGROUND TO THE PROPOSED DEVELOPMENT

This chapter of the EIAR sets out the relevant energy and climate change related policy and targets along with the strategic, regional, and local planning policies relevant to the Proposed Development. It also summarises EIA scoping and consultation undertaken and the cumulative impact assessment process.

2.1 Introduction

This Chapter of the EIAR presents the policies and targets which have been put in place at the various levels of Government both national and international in relation to renewable energy and climate change. The details below set out the need for the Proposed Development to aid Ireland in meeting its national targets and European commitments in relation to climate change and decarbonisation.

The Proposed Development will involve the removal of the existing 28 no. turbines and replacement with 11 no. wind turbines, and all other ancillary and associated site works and infrastructure on the existing Kilgarvan Wind Farm site in the townlands of Inchincoosh, Lettercannon, Inchee, Coomacullen, and Cloonkeen in County Kerry.

For ease, and as set out in Chapter 1 of the EIAR:

- Where the 'Proposed Development' is referred to, this relates to the project components described in detail in Chapter 4 of this EIAR.
- Where 'the site' is referred to, this relates to the primary study area for the EIAR, as delineated by the EIAR Site Boundary in green as shown on Figure 1-1 within Chapter 1.
- Where 'the existing Kilgarvan Wind Farm' is referred to, this relates to the Kilgarvan I and Kilgarvan II wind farm developments as outlined in Section 1.1.1 within Chapter 1.

As previously outlined in Section 1.1 within Chapter 1, this EIAR along with a Natura Impact Statement ('NIS'), accompanies this application for the proposed 11 no. wind turbines and associated infrastructure with an export capacity of approximately 72.6 megawatts (MW). 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 application. For clarity in this EIAR, all elements of the Proposed Development are assessed cumulatively and in combination with other plans and projects to aid the competent authority in carrying out an EIA. The EIAR and NIS also assesses the proposal to upgrade the existing Coomagearlahy 110kV on-site substation and associated works, which connects to the existing 110kV overhead line which in turn connects to the existing Clonkeen 110kV substation, in the townland of Cloonkeen, Co. Kerry. These works for the upgrade of the existing Coomagearlahy 110kV substation were initially proposed in a pre-application consultation with An Bord Pleanála under Section 182A of the Planning and Development Act, 2000 as amended (Ref: ABP-314799-22), and now form part of this planning application, under Section 37E of the Planning and Development Act, 2000 as amended. This approach has been confirmed following consultations with An Bord Pleanála under the provisions of Section 182A of the Act (Ref: ABP-314799-22).

The Proposed Project comprises the provision of a wind farm which will generate electricity for export onto the national grid. The need to decarbonise and reduce emissions has always been imperative, however, in recent years the urgency involved has become clearer to all stakeholders. The Climate Action Plan (CAP) first published by the Government in 2019, and updated in 2021, 2023 and 2024 sets out a roadmap to halve emissions by 2030 and reach net zero no later than 2050. Central to this is the set of measures set out to increase the proportion of renewable electricity to 80% by 2030. The CAP

places front and centre the facts that without urgent action, global heating is likely to reach more than 2˚C above pre-industrial levels by 2060, with '*devastating*' impacts on nature and '*irreversible changes to many ecosystems*' arising.

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

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

2.1.1 Renewable Energy Resources

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

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

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

2.2 Climate Change Policy and Targets

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

[1] *Source: Sustainable Energy Authority of Ireland (SEAI) website, www.seai.ie*
[2] *Climate Change 2021 'The Physical Science Basis' (Intergovernmental Panel on Climate Change, August 2021)*

The Climate Status Report for Ireland 2020, produced by MET Eireann[3] similarly reflects on clear and distinct impacts arising from climate change effects within an Irish context:

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

The IPCC's Sixth Assessment Report does not, however, conclude that a climate catastrophe is inevitable, but rather, there remains a 'narrow path' to determine the future course of climate, mainly by cutting emissions down to net zero.

The Proposed Development will contribute to the decarbonisation of the energy sector and reduce harmful emissions. In this regard, it is in compliance with national and international climate change policy and targets.

2.2.1 International Policy

United Nations Framework Convention on Climate Change

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

Kyoto Protocol

The Kyoto Protocol operationalises the UNFCCC by committing industrialised countries and economies in transition to limit and reduce GHG emissions in accordance with agreed individual targets. Ireland is a Party to the Kyoto Protocol, which came into effect in 2005, and as a result of which, emission reduction targets agreed by developed countries are now binding.

In Doha, Qatar, on 8th December 2012, the *"Doha Amendment to the Kyoto Protocol"* was adopted. These amendments are outlined in the Planning Policy Statement of Consistency Matrix included in **Appendix 2-1**. Under the protocol, countries must meet their targets primarily through national measures, although market-based mechanisms (such as international emissions trading) can also be utilised.

COP21 Paris Agreement

COP21 was the 21st session of the Conference of the Parties (COP) to the UNFCCC. Every year since 1995 (excluding 2020 due to COVID-19), the COP has gathered the 196 Parties (195 countries and the

[3] *Climate Status Report for Ireland 2020 (Environmental Protection Agency, Marine Institute, Met Éireann, August 2021)*

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

> *"Humanity has emitted 2,560 billion equivalent tons of CO_2 since 1750, and we only have a budget of 500 more if we want to limit warming to 1.5°C.*
>
> *By following a trajectory of very low GHG emissions (SSP1-1.9), the threshold of 1.5°C will be reached in the short term, between 2021 and 2040, before being very slightly exceeded (1.6°C anticipated over the period 2041-2060) then respected in the long term (1.4°C anticipated over the period 2081-2100).*
>
> *Everything is not lost, but we must pursue the Paris Agreement's most ambitious goal of limiting warming to 1.5°C."*

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

COP27 Egypt

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

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

The first outcomes of the negotiations of the COP 27 agenda were seen in the first draft document. A consolidated final document followed and while it removed much of the vague wording of the draft, it also removed some critical key points, particularly in relation to the strengthening of actions required by developed nations. The most significant outcomes from COP 27 are outlined in **Appendix 2-1** of this EIAR Chapter.

European Green Deal – European Climate Law (2021)

The European Green Deal, initially introduced by the European Commission in December 2019, sets out the 'blueprint' for a transformational change of the 27-country bloc from a high- to a low-carbon economy, without reducing prosperity and while improving people's quality of life, through cleaner air and water, better health and a thriving natural world. The Green Deal is intended to work through a framework of regulation and legislation setting clear overarching targets, e.g. **a bloc-wide goal of net zero carbon emissions by 2050 and a 55% cut in emissions by 2030 (compared with 1990 levels).** This is a substantial increase compared to the existing target, upwards from the previous target of at least 40% (2030 Climate & Energy Framework), and furthermore, these targets demonstrate the ambition

necessary to keep the global temperature increase to well below 2°C and pursue efforts to keep it to 1.5°C as per the Paris Agreement. With regard to the energy sector, the Green Deal focuses on 3 no. key principles for the clean energy transition, which will help reduce greenhouse gas emissions and enhance the quality of life for citizens:

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

The European Climate Law[4] writes into law the objectives set out above in the European Green Deal for Europe's economy and society to become climate-neutral by 2050. Climate neutrality by 2050 means achieving net zero greenhouse gas emissions for EU countries as a whole, mainly by cutting emissions, investing in green technologies and protecting the natural environment. The Climate Law includes:

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

The law aims to ensure that all EU policies contribute to this goal and that all sectors of the economy and society play their part. All 27 no. EU Member States have committed to turning the EU into the first climate neutral continent by 2050. One third of the 1.8 trillion-euro investments from the NextGenerationEU Recovery Plan, and the EU's seven-year budget, will finance the European Green Deal. On 14th July 2021, the European Commission adopted a set of proposals5 to make the EU's climate, energy, transport and taxation policies fit for reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels. Achieving these emission reductions in the next decade which is crucial to Europe becoming the world's first climate-neutral continent by 2050 would clearly be assisted by the Proposed Development.

2.2.2 National Climate Policy

Programme for Government (2020)

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

[4] *European Climate Law was published in the Official Journal on 9 July 2021 and came into force on 29 July 2021.*
[5] *'Fit for 55': delivering the EU's 2030 Climate Target on the way to climate neutrality (July 2021)*

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

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

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

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

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

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

Carbon Budgets

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

[6] *Climate Change Advisory Council Carbon Budget Technical Report (October 2021)* https://www.gov.ie/en/publication/9af1b-carbon-budgets/

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

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

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

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

The report states that the transformation of Ireland's energy system will be required for the country to meet its future 2030 and 2050 GHG emission targets; specifically, in order to reach net zero emissions by 2050, Ireland will be required to fully decarbonise electricity generation. Therefore, there is a clear incentive for developing, and safeguarding, Ireland's capacity in renewable energies and renewable electricity. Since this report was published, the Climate Action and Low Carbon Development (Amendment) Act 2021 has been enacted and there have been recent progress / future scenario assessments (e.g. EirGrid's 'All Island Generation Capacity Statement 2021 – 2030' (October 2022)).

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

Climate Action Plan 2023

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

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

CAP23 sets out indicative ranges of emissions reductions for each sector of the economy. Large-scale deployment of renewables - including onshore wind - is considered 'critical' to help decarbonise the

power sector. In relation to achieving the sectoral emissions ceiling for the electricity sector the CAP states:

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

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

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

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

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

Climate Action Plan 2024

The Climate Action Plan 2024 ('CAP 24') builds on CAP 23 by refining and updating the status of the actions required to deliver the decarbonisation required under the carbon budgets and sectoral emissions ceilings. The renewable electricity generation targets are unchanged from the CAP 23 (9GW of onshore wind & 80% renewable electricity share).

CAP 24 includes the latest trends in the electricity sector:

- In 2022, renewable generation accounted for 38.6% of electricity, an increase from 35% in 2021.
- Electricity accounted for 14.4% of Ireland's greenhouse gas (GHG) emissions in 2022.
- To meet the first carbon budget the electricity sector requires a decarbonisation rate of 17.3% per annum in the period 2023-2025. For context, the decarbonisation rate between 2018 and 2022 was 1.4% per annum.

CAP 24 acknowledges the urgency and importance of the decarbonising the electricity sector. The Plan states:

"Given that the programme of large-scale offshore wind deployment is expected to be realised towards end decade, deployment rates for onshore renewables will need to increase to match demand growth to ensure we keep electricity emissions within range of the carbon budgets. This requires a major upscaling and accelerating in current deployment of renewables, particularly onshore wind."

The deployment rates of renewable energy and grid infrastructure required to keep electricity emissions within the carbon budget programme is described as "unprecedented". Further, CAP 24 notes that it

will require "urgent action across all actors to align with the national targets". The scale of the challenge is apparent when quantified:

*"As an example, the historical average deployment of onshore wind installed capacity connected between 2008 and 2020 inclusive was ~280 MW per annum from 19 projects (with an annual maximum of 612 MW). To achieve the necessary emissions abatement, an approximately eight-times increase of renewable energy deployment to **2.3 GW annually** would be needed between **2024 and 2030**."*

CAP 24 notes:

> *"Transformational policies, measures, and actions, along with societal change, are required to meet the electricity sector's sectoral emissions ceiling. During the second carbon budget period, as the necessary infrastructure and projects come online, we will start to realise Ireland's enormous potential for offshore wind. In the meantime, to facilitate the major acceleration and increase in onshore wind turbines and solar PV required nationwide to achieve our national and regional targets, a previously unseen level of electricity network upgrades and construction will be required.*
>
> *For onshore renewables, greater alignment between national, regional and local plans and renewable energy targets to support investment in and delivery of onshore wind and solar renewable energy is also critical in this context."*
>
> CAP 24 identifies the alignment of local and national policy as critical to accelerate renewable energy rollout, noting:
>
> *"greater alignment between local plans and renewable energy targets at national and regional level to support investment in and delivery of onshore wind and solar renewable energy is also critical".*
>
> To meet the challenge posed, an acceleration of the deployment of renewable electricity generation is required, to include: (inter alia)
>
> *"Accelerate the delivery of utility-scale onshore wind, offshore wind, and solar projects through a competitive framework;*
>
> - *Target 6 GW of onshore wind and up to 5 GW of solar by 2025;*
> - *Target 9 GW of onshore wind, 8 GW of solar, and at least 5 GW of offshore wind by 2030;*
> - *All new or repowered renewable electricity generation projects shall implement a Community Benefit Fund equivalent to the RESS requirements of €2/MWh;*
> - *Most fundamentally, significant investment is needed in the transmission and distribution systems to maximise the usage of renewable electricity and to reduce constraints and congestion on the system...*
> - *Deliver a streamlined electricity generation grid connection policy and process, and remove barriers, where possible, for the installation of renewables and flexible technologies reducing the need to build new grid, including hybrid (wind/solar/storage) connections;*
> - *Provide for greater alignment between local plans and renewable energy targets at national (and regional) levels, taking into account regional targets once established and the revised National Planning Framework;*

• In line with transposing the revised Renewable Energy Directive, which entered into force in November 2023, ensure that the permit-granting procedure, the planning, construction and operation of renewable energy plants, the connection of such plants to the grid, the related grid itself, and storage assets are presumed as being in the overriding public interest;"

2.2.3 Climate Target Progress

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

The Environmental Protection Agency (EPA) publish Ireland's Greenhouse Gas Emission Projections and at the time of writing, the most recent report, '*Ireland's Greenhouse Gas Emissions Projections 2021–2040'* was published in June 2023. The report includes an assessment of Ireland's progress towards achieving its emission reduction targets out to 2030 set under the EU ESD and Effort Sharing Regulation (ESR).

The EPA has produced two scenarios in preparing these greenhouse gas emissions projections: a "With Existing Measures" (WEM) scenario and a "With Additional Measures" (WAM) scenario. These scenarios forecast Irelands greenhouse gas emissions in different ways. The WEM scenario assumes that no additional policies and measures, beyond those already in place by the end of 2021. This is the cut off point for which the latest national greenhouse gas emission inventory data is available, known as the 'base year' for projections. The WAM scenario has a higher level of ambition and includes government policies and measures to reduce emissions such as those in Ireland's Climate Action Plan 2023.

The EPA Emission Projections Update notes the following key trends:

- Ireland is not on track to meet the 51 per cent emissions reduction target (by 2030 compared to 2018) based on these projections which include most 2023 Climate Action Plan measures.
- Emissions from the Energy Industries sector are projected to decrease by between 50 and 60 per cent over the period 2021 to 2030. Renewable energy generation is projected to range from 68 to over 80 per cent of electricity generation as a result of projected further and rapid expansion in wind energy and other renewables.
- Sectoral emissions ceilings for 2025 and 2030 are projected to be exceeded in almost all cases, including Agriculture, Electricity, Industry, and Transport.
- The first two carbon budgets (2021-2030), which aim to support achievement of the 51 per cent emissions reduction goal, are projected to be exceeded by a significant margin of between 24 and 34 per cent.

As decarbonising electricity generation will have a significant positive contribution in achieving Ireland's emissions it is clear that additional renewable energy production such as that of the Proposed Development must be encouraged and supported if carbon saving targets are to be met.

2.3 Renewable Energy Policy and Targets

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

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

National policy has developed in line with European and International policies, targets and commitments, in that the importance and urgency of decarbonising the energy generation sector, the economy in general and reducing greenhouse gas emissions has become increasingly more apparent. The Proposed Development complies with the nationally stated need to provide a greater amount of renewable energy onto the national grid and will further reduce the national reliance on fossil fuels for electricity generation.

2.3.1 International Renewable Energy Policy

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

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

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

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

The revised Renewable Energy Directive (EU) 2018/2001 came into force in December 2018. It establishes a binding EU target of at least 42.5% for 2030 with a review for increasing this figure in 2023. The revised Directive sets a 2030 target of 45.5% energy from renewable sources with a potential upward revision in 2023 under.

Directive 2009/28/EC revised in 2022, set a binding renewable target for the EU for 2030 of at least 42.5%, and aiming for 45%. Significantly, since the revision process of Directive 2009/28/EC began, the need for increased renewable energy generation has become a critical consideration in light of the task of accelerating European green transition as a result of the geopolitical landscape in Eastern Europe.

The European Green Deal was launched in December 2019 and proposes to increase the binding target of renewable sources in the EU's energy mix from 32% to **40% by 2030** via amendments to the Renewable Energy Directive (Renewable Energy Directive) as per the 'Fit for 55' package (July 2021)[7]. This supports Member States in making the most of their cost-effective renewable energy potential across sectors through a combination of sectoral targets and measures. It aims at making the energy system cleaner and more efficient by fostering renewables-based electrification and, in sectors such as industry and transport where this is more difficult, it will promote the uptake of renewable fuels.

REPowerEU Plan

The European Commission has proposed an outline of a plan to make Europe independent from Russian fossil fuels, starting with gas, due to the high and volatile energy prices, and security of supply

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

concerns following the unprecedented Russia's military attack on Ukraine. The REPowerEU Plan (2022) seeks to lessen the EU's dependence on Russian fuel imports. Currently, the EU imports 90% of its gas consumption, with Russia providing around 45% of those inputs. Russia also accounts for around 25% of oil and 45% of coal imports. Phasing out dependence on fossil fuels can be done well before 2030, increasing the resilience of the EU-wide energy system based on two pillars:

1. Diversifying gas supplies, via higher Liquefied Natural Gas (LNG) and pipeline imports of biomethane and renewable hydrogen production and imports from non-Russian suppliers

2. Reducing faster the use of fossil fuels by boosting energy efficiency, increasing renewables and addressing infrastructure bottlenecks.

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

One of the key initiatives aimed at speeding up renewables permitting is the Renewable Energy Directive, which was revised in 2023 in order to reduce time and costs of permitting. Its primary goal is to streamline administrative procedures, cut down on permitting time and costs, and enhance transparency throughout the permitting process. Under this Directive, repowering projects, encompassing essential environmental assessments and grid connections, are subject to a strict maximum approval timeline of six months. Additionally, member states are mandated to institute transparent and well-defined permit-granting procedures for renewable energy projects, complete with explicit decision-making timelines .

Energy Roadmap 2050

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

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

The analysis found that decarbonising the energy system is technically and economically feasible. The Roadmap notes that all scenarios show the biggest share of energy supply technologies in 2050 comes from renewables. In this regard, it should be noted that the Climate Change Advisory Council states within their 2022 Annual Review (August 2022) that to reach "*demanding emissions reductions targets required under our climate targets, wind and solar resources will need to be harnessed to a greater and faster extent than previously considered*". As such, a major prerequisite for a more sustainable and secure energy system is a higher share of renewable energy up to and beyond 2030 to 2050. Each of the scenarios assumes in the analysis that increasing the share of renewable energy and using energy more efficiently are crucial, irrespective of the particular energy mix chosen.

Council Regulation (EU) 2022/2577

Council Regulation (EU) 2022/2577 laying down a framework to accelerate the deployment of renewable energy is now in force in Ireland. The Regulation establishes temporary rules (18 months duration) of an emergency nature to accelerate the permit-granting process applicable to the production of energy from renewable energy sources, with a particular focus on specific renewable energy technologies or types of projects which are capable of achieving a short-term acceleration of the pace of deployment of renewables in the Union. The Regulations will apply to repowering wind energy projects, solar projects and heat pumps. The key requirements are the timelines which must be applied to the permitting (including planning permission) of these projects, subject to certain criteria The permit consenting process for wind farm repowering projects should not exceed six months, and three months for solar. Where an Environmental Impact Assessment is required for repowering projects, the Regulations also state that the assessment should focus on the difference between the original project and the proposal.

The Regulation also introduces a presumption of 'overriding public interest' for renewable energy projects. This aspect relates to implementing the Habitats Directive and will have implications, particularly for existing wind energy projects located in or close to European Designated sites (Natura 2000 sites). Concerning species protection, it shall only apply if and to the extent that appropriate species conservation measures contributing to the maintenance or restoration of the populations of the species at a favourable conservation status are undertaken and sufficient financial resources, as well as areas, are made available for that purpose.

The Regulations are part of the REPowerEU package, which consists of significant measures to reduce EU dependency on Russian fossil fuels and tackle the climate crisis.

2.3.2 National Policy on Renewable Energy

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

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

Following on from an extensive consultation process, a Government White Paper entitled '*Ireland's Transition to a Low Carbon Energy Future 2015-2030* was published in December 2015 by the (then) Department of Communications, Energy and Natural Resources ("DCENR"). This Paper provides a complete energy update and a framework to guide policy up to 2030. The Paper builds upon the White Paper published in 2007 and takes into account the changes that have taken place in the energy sector since 2007.

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

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

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

National Energy Security Framework

More recently, the National Energy Security Framework (DECC, April 2022) highlights clearly the impacts the Russian invasion of Ukraine and the resulting war has had on Europe's energy system. The resulting decision by the European Union to phase out the import of Russian gas, oil and coal has brought to the fore the importance of security of supply and how energy policy is designed for long-term resilience. It takes account of the need to decarbonise society and economy, to reduce Ireland's emissions by 51% over the decade to 2030 and reach net zero emissions by 2050. According to the SEAI's Energy in Ireland (2021) report, oil accounts for 45% of Ireland's primary energy requirement making it one of the highest rate of oil dependency in the EU. The International Energy Agency, of which Ireland is a member country, includes a 10-point plan to cut oil use which calls for an acceleration in the deployment of wind and solar projects. Ireland's response per the Framework is set out over three themes:

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

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

2.3.3 Renewable Energy Target Progress

At a European level, the latest data shows that, as of 2022, 23% of energy came from renewable energy sources[8]. This represents an increase of 1.1% compared to 2021 levels. While progress is being made to increase the share of renewable energy, it is clear that all EU member states need to intensify their efforts to collectively comply with the target of 42.5% set in the latest revision of the renewable energy directive.

Of the 27 EU member states, Sweden has the highest share of energy from renewable sources. 66% of gross final energy consumption in Sweden comes from renewable energy sources. Ireland on the other hand, has the lowest share of energy of from renewable sources at 13.1%. It is evident that Ireland is not performing well when compared against our European counterparts and that urgent action is required increase the overall share of renewable energy in our gross final energy consumption. When it comes to

[8] https://ec.europa.eu/eurostat/en/web/products-eurostat-news/w/ddn-20231222-2

the share of renewable energy in electricity, Ireland does perform better generating 36.8% in 2022, but still below the EU average of 41.1%[9].

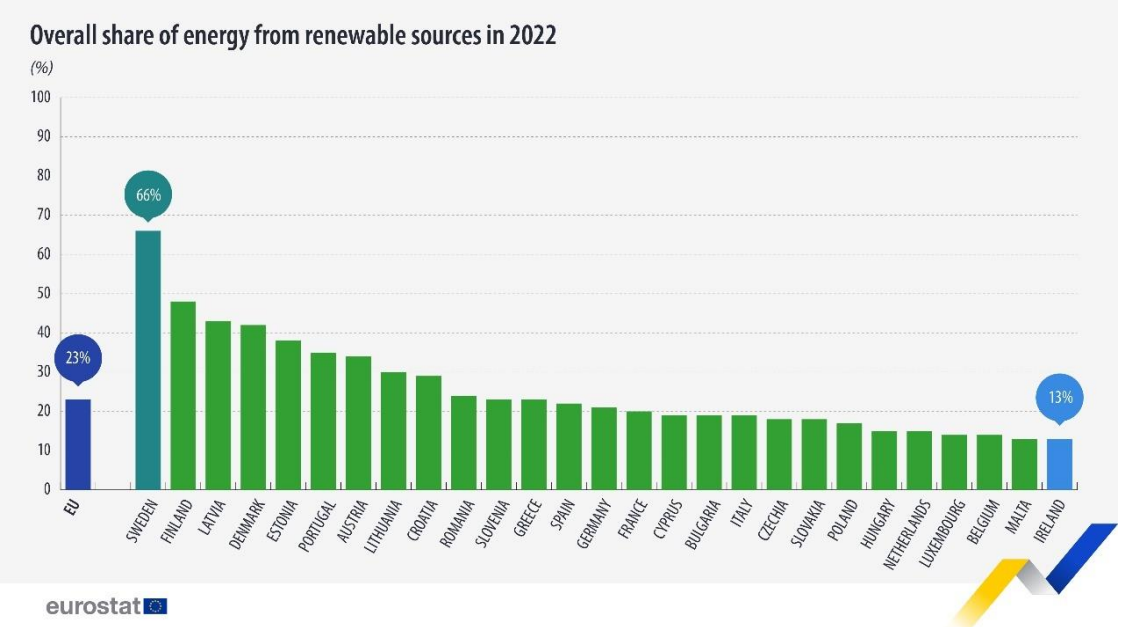

Figure 2-1: Overall share of energy from renewable sources (source: Eurostat)

Ireland's Greenhouse Gas Emissions Projections 2022 – 2040 (June 2023)

The Environmental Protection Agency (EPA) publish Ireland's Greenhouse Gas Emission Projections and at the time of writing, the most recent report, 'Ireland's Greenhouse Gas Emissions Projections 2022–2040' was published in June 2023. The report includes an assessment of Ireland's progress towards achieving its emission reduction targets out to 2030 set under the EU ESD and Effort Sharing Regulation (ESR).

The EPA has produced two scenarios in preparing these greenhouse gas emissions projections: a "With Existing Measures" (WEM) scenario and a "With Additional Measures" (WAM) scenario. These scenarios forecast Irelands greenhouse gas emissions in different ways. The WEM scenario assumes that no additional policies and measures, beyond those already in place by the end of 2021. This is the cut off point for which the latest national greenhouse gas emission inventory data is available, known as the 'base year' for projections. The WAM scenario has a higher level of ambition and includes government policies and measures to reduce emissions such as those in Ireland's Climate Action Plan 2023.

The EPA Emission Projections Update notes the following key trends:

- Ireland is not on track to meet the 51 per cent emissions reduction target (by 2030 compared to 2018) based on these projections which include most 2023 Climate Action Plan measures.
- Emissions from the Energy Industries sector is projected to decrease by between 50 and 60 per cent over the period 2021 to 2030. Renewable energy generation is projected to range from 68 to over 80 per cent of electricity generation as a result of projected further and rapid expansion in wind energy and other renewables.
- Sectoral emissions ceilings for 2025 and 2030 are projected to be exceeded in almost all cases, including Agriculture, Electricity, Industry, and Transport.

[9] https://ec.europa.eu/eurostat/databrowser/view/nrg_ind_ren__custom_9264705/default/bar?lang=en

- The first two carbon budgets (2021-2030), which aim to support achievement of the 51 per cent emissions reduction goal, are projected to be exceeded by a significant margin of between 24 and 34 per cent.

As decarbonising electricity generation will have a significant positive contribution in achieving Ireland's emissions it is clear that additional renewable energy production such as that of the Proposed Development must be encouraged and supported if carbon saving targets are to be met.

National Energy Projections (November 2023)

The National Energy Projections report was published by the SEAI in November 2023 sets outs the most recent updates to Ireland's progress towards its binding European and National renewable energy targets. Based on the EPA projections outlined above published in June 2023, the report presents the findings of the 2023 national energy and climate modelling cycle.

The existing EU wide target set in REDII is 32% RES by 2030. Irelands current national EU binding target for 2030 RES is 34.1%. There are also interim targets for 2022, 2025 and 2027, as shown in Table 2-2 below. Since the publication of the *National Energy Projections* report, the European Parliament and Council have introduced REDIII, increasing this target to a minimum of 42.5% RES by 2030. It is likely that Ireland's national target will increase in line with the increase at EU level.

Table 2-2: Overall renewable energy share projections under EPA scenarios

Current REDII target for overall renewable energy share (RES) for Ireland		WEM	WAM - CAP 21	WAM – CAP23
2025	Projected overall RES	19%	20%	22%
	REDII overall RES target for Ireland	24%	24%	24%
	Gap to target	-4%	-3%	-2%
2027	Projected overall RES	22%	26%	27%
	REDII overall RES target for Ireland	28%	28%	28%
	Gap to target	-5%	-2%	-1%
2030	Projected overall RES	31%	40%	45%
	REDII overall RES target for Ireland	34%	34%	34%
	Gap to target	-3%	6%	11%

In the interim years of 2025 and 2027, the WAM-CAP23 scenario indicates a failure to meet the interim overall RES targets. This is attributed to the revised profile of renewable generation capacity additions, which now assumes that more of the planned capacity will arrive later in the decade. If Ireland's target aligns with the increased EU-level goal under RED III, it would widen the gap to the target during the interim years.

The decarbonisation of the electricity generation is critical considering the need to electrify other sectors such as heating and transport in order to achieve the sectoral decarbonisation targets. By 2030, renewable energy sources are anticipated to dominate electricity generation, particularly experiencing a significant surge later in the decade attributed to the integration of substantial offshore wind projects. In the CAP23 scenario, there is an expedited deployment of onshore renewable generation capacity in the earlier years of the decade compared to the CAP21 scenario. However, both scenarios aim to achieve a similar overall percentage of electricity derived from renewable sources (RES-E) by the year 2030.

Figure 4: Fuel use for electricity generation

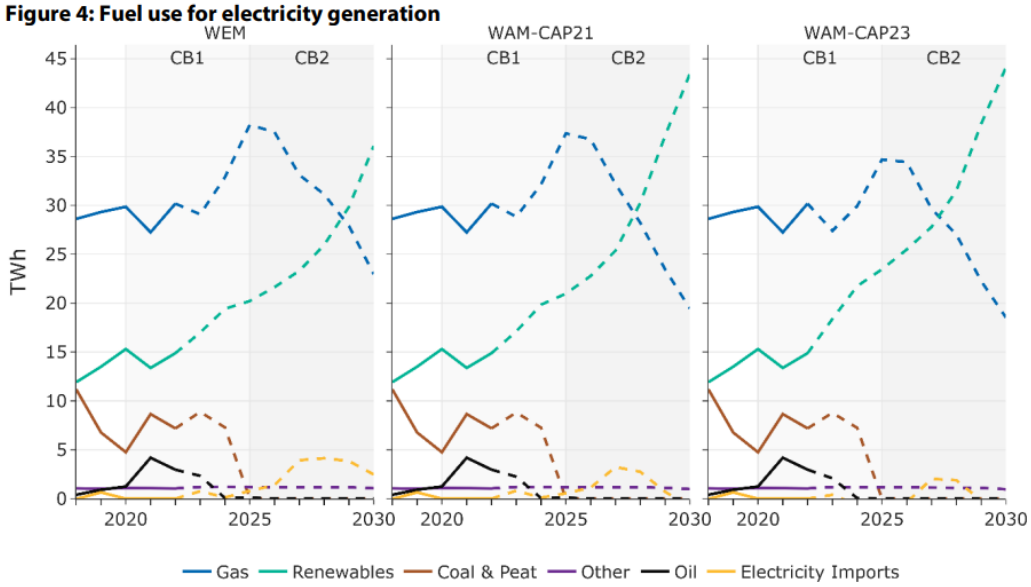

Figure 2-2: Electricity generation by fuel source (source: SEAI)

The report projects greenhouse gas emissions under the WEM and WAM scenarios. It is projected that in both the WEM and WAM scenarios, the carbon budget for the electricity sector will be exceeded. This is largely due to the cumulative nature of the carbon budgets, where exceedances in the early years results in steeper emissions reductions in the latter years to compensate. In the WEM scenario, emissions are projected to reach the first sectoral ceiling in 2024. This results in a significant overspend of 7.4 $MtCO_2eq$ (19%) within the final 2 years of the first carbon budget period 2020–2025. This would have a knock-on effect on the second carbon budget period 2025-2030, which would likely be unattainable from the outset.

Under the WAM CAP23 scenario, cumulative emissions reach the first sectoral ceiling in the 2024, leading to an overspend of the first budget period by 5.6 $MtCO_2eq$ 2024-2026. Despite the improvement on the WEM scenario, the WAM CAP23 scenario exceeds the second budget period (2025 – 2030) ceiling by 2027. By the end of the decade, the WAM CAP23 scenario projects an exceedance of 13.8 $MtCO_2eq$ (23%).

It is clear from the projections outlined above that unprecedented action is required as soon as possible. Unless carbon emissions are reduced sharply before 2025, it will be impossible to stay within the second budgeting period as required to by law under the Climate Action and Low Carbon Development (Amendment) Act 2021.

The Climate Change Advisory Council Annual Review 2023

The Climate Change Advisory Council (CCAC) concluded within their *2023 Annual Review* that at the current rate of policy implementation, *"Ireland will not meet the targets set in the first and second carbon budget periods unless urgent action is taken immediately and emissions begin to fall much more rapidly"*.

In relation to the rollout of renewable energy, the CCAC note that the current rate of renewable energy connections to the national grid needs to increase substantially in order to meet CAP23 targets. The CCAC state:

> *"The current rate of connecting renewables will need to more than double to meet NCAP 2023 targets for 9GW of onshore wind and 8GW of solar power connected to the electricity system by 2030, which for context equates to a further approximately 1,500MW of onshore renewables connected to the electricity system on average each year."*

The CCAC reiterates the importance of the REPowerEU regulations and the agreed aim to ensure "*the planning, construction and operation of plants and installations for the production of renewable energy is presumed to be in the overriding public interest".* The CCAC acknowledge the quantity of planning applications necessary to achieve the CAP 23 target of 9GW of onshore wind energy and advise that further resources are put in place to ensure that the consenting authorities are well resourced to assess these applications.

Ireland's Climate Change Assessment (January 2024)

In January 2024, the EPA published Irelands Climate Change Assessment (ICCA). This assessment provides a comprehensive overview and breakdown of the state of knowledge around key aspects of climate change with a focus on Ireland. The ICCA report is presented in four volumes.

- Volume 1: Climate Science – Ireland in a Changing World
- Volume 2: Achieving Climate Neutrality in 2050
- Volume 3: Being Prepared for Irelands Future
- Volume 3: Realising the Benefits of Transition and Transformation

The ICCA Synthesis Report states that having peaked in 2001, Irelands greenhouse gas emissions have reduced in all sectors except agriculture. However, Ireland currently emits more greenhouse gases per person than the EU average. The report goes on to state that there has been an identified gap in policy that indicates that Ireland will not meet its statutory greenhouse gas emission targets. Achieving net zero carbon dioxide emissions by 2050 requires significant and unprecedented changes to Ireland's energy system. Policies tailored to suit different stages of technology development are critical for achieving a net zero energy system. Established technologies, such as wind energy, solar photovoltaics and bioenergy will be key in meeting short-term emission reduction targets (i.e. 2030), whereas offshore wind infrastructure is expected to be the backbone of future energy systems. This can only be achieved with appropriate support schemes, regulation and investments for synergistic growth of offshore wind and other renewable technologies.

There are well-established 'no-regret options' that need to happen now, which can get Ireland most of the way to net zero carbon dioxide emissions. Beyond that, there are 'future energy choices' relating to the scale and magnitude of technologies that will assist in achieving Ireland statutory climate targets. Ireland's no-regret options are demand reduction (e.g. through energy efficiency and reduced consumption), electrification (e.g. electric vehicles and heat pumps), deployment of market-ready renewables (e.g. wind energy and solar photovoltaics) and low-carbon heating options (e.g. district heating); Irelands future choices include hydrogen, carbon capture and storage, nuclear energy and electro-fuels. Renewable energy can increasingly provide our future energy needs but will need to be complemented with carbon dioxide removals to achieve a net zero energy system in hard-to-abate sectors.'

2.4 Strategic Planning Policy Context

2.4.1 Introduction

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

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

The Proposed Development is consistent with the overall national policy objectives to increase penetration and deployment of renewable energy resources and has been designed in the context of the relevant wind energy and other guidelines. Specific compliance with the County Development Plan provisions is dealt with in detail in the County Development Plan sections below. Each of these documents are summarised below, with more detailed analysis included in **Appendix 2-1** attached to this EIAR.

2.4.2 National Policy Context

2.4.2.1 National Planning Framework: Project Ireland 2040

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

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

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

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

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

- A shift from predominantly fossil fuels to predominantly renewable energy sources.
- Increasing efficiency and upgrades to appliances, buildings and systems.
- Decisions around development and deployment of new technologies relating to areas such as wind, smart grids, electric vehicles, buildings, ocean energy and bio energy.
- Legal and regulatory frameworks to meet demands and challenges in transitioning to a low carbon society.

An overarching objective of the NPF is to foster a transition toward a low carbon, climate-resilient society, which reflects the policy ethos established at the European level of governance (e.g. climate change and renewable energy targets – Section 2.1). In this regard, one of the key themes of the NPF is the realisation of an Ireland which has a secure and sustainable renewable energy supply and the ability

to diversify and adapt to new energy technologies. The NPF references the National Climate Policy Position which established the fundamental objective of achieving transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050. The NPF emphasises that rural areas have a strong role to play in securing a sustainable renewable energy supply for the country and acknowledges that *"rural areas have significantly contributed to the energy needs of the country and continue to do so"*. In this regard, the NPF states:

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

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

In regard to the above, it is clear that the provision of repowered renewable energy generation is in line with the aims and objectives of the NPF which seeks to transition to a low carbon economy.

2.4.2.2 National Development Plan 2021 – 2030

The National Development Plan 2021 – 2030 (NDP) was published on the 4th October 2021 and sets out the major public investment projects identified by Government which are to play a significant role in addressing the opportunities and challenges faced by Ireland over the coming years such as Covid-19, Brexit, housing, health, population growth, and most relevant to the subject development, climate change. It is stated that the NDP 2021 – 2030 will be the *'largest and greenest ever delivered in Ireland'*, and in this regard, the NDP highlights that extensive consultation was undertaken to ensure that the plan adequately supports the implementation of climate action measures. Reflecting on the of the IPCC's 6th Assessment Report discussed here at Section 2.2, the NDP notes that the Irish Government is fully committed to 'playing its part' to ensure that the worst climate change damage can be avoided, e.g. significant reductions in CO_2 and other greenhouse gas emissions as assisted by the achievement of both European and National renewable energy targets. Specifically, the NDP states that,

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

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

One of the NDP's strategic climate priorities in the need for low-carbon, resilient electricity systems; specifically, the plan commits to increasing the share of renewable electricity up to 80% by 2030. This is characterised by the NDP as an '*unprecedented commitment to the decarbonisation of electricity supplies*' which, if compared to the Climate Action Plan (CAP) 2023 and the objective to increase the proportion of renewable electricity to up to 80% by 2030 and a target of 8 gigawatt (GW) from onshore wind, is certainly ambitious and an explicit driver for the deployment of new renewable generators and the safeguarding / maintenance of existing assets, e.g. the subject development. It is noted that the reliability of electricity supplies will also be strengthened through investment in the electricity

transmission and distribution grid. The focus of investment in regulated network infrastructure is to contribute to a long-term, sustainable and competitive energy future for Ireland.

2.4.3 Regional Policy Context

2.4.3.1 Southern Region Economic and Spatial Strategy

The Southern Regional Assembly adopted its Regional Spatial and Economic Strategy (RSES), in January 2020. The RSES supports an increase in the amount of new renewable energy sources in the Region, including provisions for wind energy (both onshore and offshore), in accordance with National policy and the Regional Policy Objectives. The Proposed Development would contribute to continuing the levels of renewable energy supply in a manner consistent with the proper planning and sustainable development of the area/region. Therefore, the Proposed Development is consistent with the provisions of the RSES, particularly the provisions set out in Chapter 5 of the RSES and Regional Policy Objectives (RPO) 96 and 99, which are laid out in the Planning Policy Matrix included in **Appendix 2-1** of this Chapter of the EIAR.

In summary, the Proposed Development will significantly contribute towards continuing to meet sustainable energy targets and objectives at County, Regional and National level and these criteria are therefore accorded with.

2.4.4 Local Policy Context

The Proposed Development is located in County Kerry, with part of the existing access road located in County Cork. The wind turbines, extension to the existing onsite 110kV Coomagearlahy substation and all associated development are located in the administrative area of County Kerry, while the access road for the existing wind farm is partially within the administrative area of County Cork.

The subject site is primarily located within the administrative boundary of Kerry County Council and is, therefore, governed by Kerry's Local Planning Policy. The Local Authority adopted the Kerry County Development Plan 2022-2028 (KCDP). The detailed planning policy in respect of Kerry County Council is included in **Appendix 2-1** for reference.

It should be noted that as the EIAR boundary extends into the administrative boundary of Cork the planning framework of both Cork and Kerry is relevant in the context of the EIAR. The Cork County Development Plan 2022-2028 (CCDP) came into effect on 6th June 2022. The detailed planning policy in respect of Cork County Council is included in **Appendix 2-1** for reference.

2.4.4.1 Kerry County Development Plan 2022-2028

The Kerry County Development Plan 2022-2028 sets out that 'Climate Action and Renewable Energy' is a principle of the core strategy – "*to transition to a low carbon and climate resilient county, with an emphasis on reduction in energy demand and greenhouse gas emissions, through a combination of effective mitigation and adaptation responses to climate change; whilst increasing the resilience of our Natural and Cultural Capital to climate change by planning and implementing appropriate adaptation measures*".

There is abundant planning policy set out in the Kerry County Development Plan (KCDP) 2022-2028 which is supportive of this Proposed Development. In particular, the subject site is located in an area that is zoned as a 'Repower Area', and is, therefore, suitable in principle for the proposed repowering of the existing windfarms within the subject site. There is, therefore, policy support at local level for the development of renewable energy projects in County Kerry, in accordance with the Kerry County Development Plan 2022-2028.

The detailed planning policy in respect of Kerry County Development Plan is included in **Appendix 2-1** for reference.

2.4.4.2 Kerry County Council Local Authority Climate Action Plan 2024-2029

The Kerry County Council Local Authority Climate Action Plan (LACAP) was adopted on 12th February 2024. This plan highlights the current state of climate action in Ireland, and how Kerry County Council intends to deliver and enable climate action for a just transition to a low carbon and climate resilient future within County Kerry. The LACAP will help address the mitigation of greenhouse gases, the implementation of climate change adaption measures, and will strengthen the alignment between national climate policy and the delivery of effective local climate action.

Overall, the GHG emissions generated from County Kerry equated to 5,208,582 tCO2eq in the baseline year, 2018. The top three emitting sectors within County Kerry in terms of total greenhouse gas emissions in the baseline year were agriculture, residential, and transport, producing 53%, 13%, and 11% of total emissions respectively. Kerry County Council, along with all public sector entities must reduce greenhouse gas emissions by 51% by 2030 as compared to 2018 in line with the National Climate Action Plan.

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

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

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

The detailed planning policy in respect of The Kerry County Council Local Authority Climate Action Plan is included in **Appendix 2-1** for reference.

2.4.4.3 Cork County Development Plan 2022-2028

The EIAR boundary is primarily located within the administrative boundary of County Kerry and is, therefore, governed by Kerry County Council's local planning policy. However, as a portion of the access road is located within the administrative boundary of County Cork. While there are **no proposed works within County Cork**, the EIAR boundary traverses the administrative boundaries of Cork and Kerry, it is considered pertinent to demonstration of the appropriateness of the windfarm that the proposed wind development would be suitable in this area of County Cork.

The Cork County Development Plan 2022-2028 (CCDP) came into effect on 6th June 2022 and was also subject to a Draft Ministerial Direction in accordance with section 31(4)(c) of the Act. The Minister's Final Direction, pursuant to Section 31 of the Act, was issued on 28th September 2022, stating the CCDP has not been made in compliance with the requirements of the Act. The requirements of this Direction did not have an impact this subject site or Proposed Development.

There is policy support at local level for the development of renewable energy projects in County Cork, in accordance with the Cork County Development Plan 2022-2028. The detailed planning policy in respect of Cork County Council is included in **Appendix 2-1** for reference.

2.4.4.4 Cork County Council Local Authority Climate Action Plan 2024-2029

The Cork County Council Local Authority Climate Action Plan (LACAP) was adopted on 12th February 2024. This plan highlights the current state of climate action in Ireland, and how Cork County Council intends to deliver and enable climate action for a just transition to a low carbon and climate resilient future within County Cork. The LACAP will help address the mitigation of greenhouse gases, the implementation of climate change adaption measures, and will strengthen the alignment between national climate policy and the delivery of effective local climate action.

Overall, the GHG emissions generated from County Cork equated to 8,083 tCO2eq in the baseline year, 2018. The top three emitting sectors within County Cork in terms of total greenhouse gas emissions in the baseline year were agriculture, residential, and commercial and manufacturing, producing 39%, 20%, and 12% of total emissions respectively. Cork County Council, along with all public sector entities must reduce greenhouse gas emissions by 51% by 2030 as compared to 2018 in line with the National Climate Action Plan.

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

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

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

The detailed planning policy in respect of The Cork County Council Local Authority Climate Action Plan is included in **Appendix 2-1** for reference.

2.4.5 Other Relevant Material Considerations

DoEHLG Wind Energy Guidelines 2006

In June 2006, the then Department of Environment, Heritage and Local Government (DoEHLG) published '*Wind Energy Development Guidelines for Planning Authorities'* (the Guidelines) under Section 28 of the Planning and Development Act, 2000. The aim of these guidelines was to assist the proper planning of wind power projects in appropriate locations around Ireland. The Guidelines highlight general considerations in the assessment of all planning applications for wind energy. They set out advice to planning authorities on planning for wind energy through the development plan process and in determining applications for planning permission. They contain guidelines to ensure consistency of approach throughout the country in the identification of suitable locations for wind energy development.

Each wind project has its own characteristics and defining features, and it is therefore impossible to write specifications for universal use. Guidelines should be applied practically and do not replace existing national energy, environmental and planning policy. While the 2006 Guidelines remain the relevant guidelines in place, at the time of lodgement, in accordance with Article 5 of the recent RepowerEU provisions, decision makers (Planning Authorities and An Bord Pleanála) are now bound to make a decision within 6 months of lodgement of such a repowering application.

Draft Revised Wind Energy Guidelines 2019

The Department of Housing, Planning and Local Government published the '*Draft Wind Energy Guidelines*' (referred to as the draft Guidelines) in December 2019. The draft Guidelines were open to public submissions up until the 19th of February 2020. These submissions are now being considered by the Department. At time of writing, the guidelines in place remain the draft Guidelines pending the Department publishing a final version of any revised guidance.

The draft Guidelines clearly sets out the recognition that the proper planning and sustainable development of areas and regions must be taken into account when local authorities prepare their development plans and assess planning applications, irrespective of the significant role renewable energy has to play in tackling climate change.

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

- Acceptable noise thresholds and monitoring frameworks;
- Visual amenity setback;
- Control of shadow flicker;
- Compliance with Community consultation and dividend requirements, as included within the obligatory Community Report;

The design of the Proposed Development has taken account of the *"preferred draft approach"* and accordingly, has been developed with the provisions of the draft Guidelines in mind (for example in relation to 4 times turbine tip height set back distance from third party sensitive receptors).

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

At time of writing the draft Guidelines are not yet finalised and have not been adopted. The relevant Wind Energy Guidelines for the purposes of section 28 of the Planning and Development Act 2000, as amended, remain those published in 2006. Notwithstanding this, however, due to the timelines associated with the planning process for renewable energy projects it is possible that an updated version of the draft Guidelines may be finalised during the consideration period for the current Proposed Development. To this end on the basis of the details available from the draft Guidelines it is anticipated that the Proposed Development will be capable of adhering to the relevant noise and shadow flicker standards, albeit without sight of the final, adopted Guidelines the processes by which the Proposed Development will comply with the same cannot be confirmed at this stage. While the final Guidelines have not yet been published it should be noted that the Proposed Development maintains a four times tip height set back between turbines and identified sensitive receptors and furthermore detailed community consultations have been carried out.

DoHPCLG Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change 2017

In July 2017, the (then) Department of Housing, Planning, Community and Local Government (DoHPCLG) published '*Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change'* under Section 28 of the Planning and Development Act 2000. Planning authorities are obliged to have regard to guidelines issued pursuant to Section 28 in the performance of their functions under the Planning and Development Act 2000 (as amended).

The Guidelines state that it is a specific planning policy requirement under Section 28(1C) of the Act, that in making a development plan with policies or objectives that relate to wind energy developments that a Planning Authority must:

- *"Ensure that overall national policy on renewable energy as contained in documents such as the Government's 'White Paper on Energy Policy - Ireland's Transition to a Low Carbon Future', as well as the 'National Renewable Energy Action Plan', the 'Strategy for Renewable Energy' and the 'National Mitigation Plan', is acknowledged and documented in the relevant development plan or local area plan;*
- *Indicate how the implementation of the relevant development plan or local area plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts); and*
- *Demonstrate detailed compliance with item number (2) above in any proposal by them to introduce or vary a mandatory setback distance or distances for wind turbines from specified land uses or classes of land use into their development plan or local area plan. Such a proposal shall be subject to environmental assessment requirements, for example under the SEA and Habitats Directives. It shall also be a material consideration in SEA, when taking into account likely significant effects on climatic factors, in addition to other factors such as landscape and air, if a mandatory setback or variation to a mandatory setback proposed by a planning authority in a development plan or local area plan would create a significant limitation or constraint on renewable energy projects, including wind turbines, within the administrative area of the plan."*

Department Circular PL5/2017

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

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

- The application of a more stringent noise limit, consistent with World Health Organisation noise standards, in tandem with a new robust noise monitoring regime, to ensure compliance with noise standards;
- A visual amenity setback of 4 times the turbine height between a wind turbine and the nearest residential property, subject to a mandatory minimum distance of 500 metres between a wind turbine and the nearest residential property;
- The elimination of shadow flicker; and

- The introduction of new obligations in relation to engagement with local communities by wind farm developers along with the provision of community benefit measures.

IWEA Best Practice Guidelines for the Irish Wind Energy Industry 2012

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

IWEA Best Practice Principles in Community Engagement and Community Commitment 2013

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

The applicant has engaged in consultations with the population in the direct vicinity of the Proposed Development through letter drops to the local community. A dedicated community liaison officer has also been appointed to the project with the general public being provided with various contact details (including email address and phone number) to facilitate any queries which may arise.

Further details on the community engagement that has been undertaken as part of the Proposed Development are presented below within Section 2.6.3.

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

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

Renewable Energy Support Scheme (RESS)

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

The RESS is an auction-based scheme which invites renewable electricity projects to bid for capacity and receive a guaranteed price for the electricity they generate. The third onshore RESS auction, 'RESS 3', was opened for public submissions in Q3 of 2022, with the final auction results being made public in October 2023. The Programme for Government commits to holding RESS auctions at frequent intervals throughout the lifetime of the scheme. This will allow Ireland to take advantage of falling technology costs and avoid 'locking in' higher costs for consumers. The aim of the targeted consultation is to receive stakeholder feedback on these proposed aspects of the Terms and Conditions which may impede the efficient and cost-effective delivery of renewable electricity projects under RESS 3.

RESS 3 was a major step in meeting the ambition of achieving up to 80% renewables by 2030, up to 8GW of onshore wind capacity and the updated ambition of up to 5.5GW of solar capacity under the revised Sectoral Emissions Ceilings.

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

2.5 Planning History

This Section of the EIAR discusses the relevant planning history of the Proposed Development site, including all planning applications which overlap or are within the planning application boundary of the current Proposed Development made within the period 2017 to August 2023.

The existing Kilgarvan Wind Farm, located to the east of Kilgarvan, in Co. Kerry, is made up of 3 no. wind farm sites, which are in turn made up of smaller wind farm operations and a number of planning applications. These are summarised within Chapter 1 of the EIAR, under Section 1.1.2.

2.5.1 Planning Applications within the Application Boundary

A planning search was carried out online through Kerry County Council's planning portal for this period. Only one application was found during this time range relating to the retention of a telecommunications mast by Meteor Mobile which was originally approved in 2001 and renewed twice before the most recent application. 21 no. historic valid planning applications were identified, 3 of which relate to the Meteor Mobile telecommunications mast. These are listed in **Table 2-3** below.

Table 2-3: Valid Planning Applications within the Application Boundary

Planning Reference	Development Description	Applicant	Decision
Kilgarvan I			
02/1241	Construct a windfarm consisting of 17 wind turbines, an electrical substation with control building, 2 no. 50m high meteorological masts, construct and extend existing internal site tracks and associated works - EIS received	Coillte Teoranta And SWS Services Co-Op	Conditional 27/12/2002 30 Conditions
03/2176	Change the turbine hub height from 60m to 80m in the existing planning permission for a wind farm (EIS received)	Coillte Teoranta & SWS Services Co-Op Ltd	Conditional 2 Conditions 22/10/2003
03/992176	The change of turbine hub height from 60m to 80m in the existing planning permission for a wind farm	SWS Natural Resources Ltd.	Extension of Duration Granted – Expiry 21st October 2018
03/2306	Construct a wind farm extension to planning reg no 1241/02, extension will consist of 4 wind turbines (hub height 80 m, blade diameter 80 m), construction and extension of existing internal site tracks and associated works. EIS received	SWS Group & Coillte	Conditional 15 Conditions 28/10/2003
07/3648	Carry out alteration to an existing electrical substation (planning ref. No. 02/1241) where the alteration is an additional transformer bay and 20kv substation including a control building, power transformer, reactive power compensation system and associated works.	SWS Natural Resources Ltd.	Conditional 1 Condition 13/11/2007
19/1325	The installation of battery arrays, located within container units (18 number units, each 30m2 by c.2.6m tall), a control building (c.160.5m2 by c.6.4m tall) and transformer (c.5m tall). The development will include for ancillary infrastructure including security fencing, lighting, CCTV, internal access roads and drainage. The overall development site is c.1.6ha. The application includes a natura impact statement (NIS)	Brookfield renewable Ireland LTD.	Conditional 8 Conditions 28/07/2020
Kilgarvan II			

Planning Reference	Development Description	Applicant	Decision
Inchincoosh			
07/1605	Erect six wind turbines hub height 80m, blade diameter 90m, one 80m high meteorological mast, four borrowpits, construction of internal site tracks and associated works	John O'Donoghue, Helen O'Sullivan And Daniel Quill	Conditional for 5 no. turbines 13 Conditions 02/08/2007 Refused Turbine No. 6.
07/4364	Erect one wind turbine, hub height 80m, blade diameter 90m (as an addition to a five wind turbine development granted permission under planning ref. No. 07/1605) and to construct an internal site track and associated works	John O'Donoghue, Helen O'Sullivan And Daniel Quill	Conditional 12 Conditions 29/01/2008
Lettercannon			
ABP Ref: 08.209629 LPA Ref: 03/2508	6 no. 3MW wind turbines, service roadways and control house and 1 no. 60m monitoring mast (temporary) and river crossing (temp.) and associated works	John Dineen	Conditional (Revised) 12 Conditions 27/04/2005
07/4515	Move one wind turbine (T1) as an alteration to a six wind turbine development granted planning permission by An Bord Pleanála (ABP ref pl. 08.209629 and Kerry County Council planning register ref 03/2508). It is proposed to move the turbine approximately 480m to the northeast of its current location	SWS Natural Resources Ltd	Conditional 12 Conditions 13/02/2008
07/4701	Erect one wind turbine (T9), hub height 80m, blade diameter 90m, as an addition to a six wind turbine development granted planning permission by An Bord Pleanála (ABP ref: pl.08.209629 and Kerry County Council planning register ref. 03/2508) and to construct an internal site track and associated works	SWS Natural Resources Ltd	Conditional 12 Conditions 22/02/2008
ABP Ref: P08.232259 LPA Ref: 08/2298	Erect 1 no. permanent meteorological mast of 80 metres in height with internal access road	Inchincoosh Windfarm Ltd.	Conditional (Revised) 5 Conditions

Planning Reference	Development Description	Applicant	Decision
			07/07/2009
05/1351	Erect two temporary 75m high meteorological masts for a duration of 3-4 months, the erection of two permanent 75m- high meteorological masts and associated equipment for the purposes of monitoring windspeeds	SWS Natural Resources	Conditional 17 Conditions 31/08/2010
Grid Infrastructure			
04/1648	Construct an overhead transmission line of single circuit 110kv from the windfarm at Inchee and construct a 110kv switching substation. An EIS has been submitted in support of this application.	Coillte Teoranta And South Western Services Co-Op Society	Conditional 10 Conditions 24/02/2005
06/1143	Alteration to 110kv substation (planning ref. No. 04/1648) where the alteration is 1 no. Additional end mast tower (18m high), 1 no. Additional static wire lightening conductor and the re-orientation of site control building as required by ESB national grid	SWS Natural Resources	Conditional 1 Condition 31/05/2006
06/2660	For the alteration to 100kv substation (planning ref no. 04/1648) where the alteration is 1 no. Additional line bay consisting of circuit breaker and associated equipment as required by ESB national grid	ESB National Grid	Conditional 1 Condition 18/10/2006
04/356 – Cork County Council	Construction of 5.8km overhead transmission line of single circuit 110kV	Coillte Teoranta	Granted – Unconditional 12/07/2004
Other Applications			
01/2351	To erect a 30 meter telecommunications hexagonallattice tower with transmission equipment container	Meteor Mobile Communications	Conditional 13 Conditions 01/11/2006
ABP Ref: PL08.221244 LPA Ref: 06/3727	Retention of develompent consisting of a 30 metre hexagonal lattice tower with transmission equipment, associated equipment container and perviously granted under Planning Ref No. 01/2351	Meteor Mobile Communications Limited	Conditional 2 Conditions 31/05/2007

Planning Reference	Development Description	Applicant	Decision
11/990	Retain and operate an existing 30m hexagonal lattice tower with transmission equipment, equipment container and palisade perimeter fencing as permitted under planning ref no. 06/3727; ABP PL08.221244	Meteor Mobile Communications Limited	Conditional 4 Conditions 26/03/2012
18/496	Retain an existing development at this site. The development consists of an existing 30 metre high telecommunications support structure carrying telecommunications equipment, together with existing equipment container and associated equipment within a fenced compound as previously granted under local authority ref. No. 11/990.	Meteor Mobile Communications Limited	Conditional 3 Conditions 28/09/2018

2.5.2 Wind Energy Applications Within 25km Application Boundary

A planning search was carried out to establish permitted and operational wind farms within 25km of the subject site. The search was carried out using the relevant local authority planning portals in August 2023 for relevant planning applications. In total, 23 no. existing and 2 no. proposed wind farms within 25km were identified in **Table 2-4** and **Table 2-5** below. A full Planning History search of the site and surrounding area is included in **Appendix 2-2** of this Chapter.

Kerry

Table 2-4: Wind Farms within the 25km Radius of the Proposed Development – Kerry County Administrative Area

Application Reference	Description	Decision
Inchee windfarm		
08/120	Erect 2 wind turbines of 80 metres hub height and 90 metres rotor blade diameter on site tracks and all necessary cabling. The existing Inchee wind farm owned by Midas energy ltd. Coolknoohil, Inchee, Co Kerry	Grant 11/03/2008
08/9120	Erect 2 wind turbines of 80 metres hub height and 90 metres rotor blade diameter on site tracks and all necessary cabling. The existing Inchee wind farm owned by Midas energy ltd. Coolknoohil, Inchee, Co Kerry	Grant 18/06/2013
03/1188	Develop wind farm consisting of 9 no. Wind turbines of 78 metres hub height and 80 metres rotor blade diameter; wind monitoring mast of 40 metres height; on site tracks and electrical control house together with necessary cabling. Inchee, Poulbatha & Foilgreana	Grant 08/10/2003
Clonkeen windfarm		
03/3493	Development of a wind farm, the wind farm will consist of 2 wind turbines and service roadways on a site, (an EIS has been submitted with this application) Clydaghroe, Clonkeen, Co. Kerry	Withdrawn
04/3152	Develop a wind farm to include 2 wind turbines and service roadways. An environmental impact statement (EIS) has been included. Clydaghroe, Clonkeen	Grant 13/10/2004
07/306	The development will consist of 1 wind turbine and service roadway. EIS submitted. Clydaghroe, Clonkeen, Co Kerry	Grant 22/03/2007

Application Reference	Description	Decision
99/1490	Construct a wind farm together with ancillary site works comprising of 17 no turbines, substation/control centre building and compound and site roads for which an E.I.S has been submitted for inspection. Clydaghroe/cumeenabuddoge, clonkeen	Grant 04/08/2000
Grousemount windfarm		
03/3524	Develop Grousemount Wind Energy Project which will comprise of 28 wind turbines access tracks a fenced switchyard comprising single storey control buildings and substation and anemometer masts. Wind turbines will comprise towers from 60 meters to 70 meters high with a diameter of about 4 meters at the base. Three blades of up to 42 meters length will be attached. E.I.S. received. Grousemount / Sillahertan, Balagh, Kilgarvan, Co. Kerry	Grant 05/07/2004
08/70044	Strategic Infrastructure Development for the construction of wind farm comprising 38 wind turbines and all associated site works at townlands in county Kerry and County Cork. Grousemount	Grant 06/06/2016
10/1333	Erect 24 wind turbines each having a rated electrical output of 2,000 kilowatts, access tracks, a fenced switchyard comprising single storey control buildings and substation, anemometer masts borrow pits, a wastewater treatment system and all associated site works, above and below ground. Each wind turbine will have an overall maximum dimension of 126 metres, comprising a tower 80 - 85 metres high, with a diameter of about 4 metres at the base, to which three blades of 41 - 45 metres length will be attached, an environmental impact statement is submitted. Planning permission for 10 years. Grousemount Wind Farm, Ballagh/ Grousemount/ Knockanruddig, Kilgarvan, Co Kerry	Grant 16/12/2011
15/1164	For ten years for the provision of underground grid connection electrical cabling including all associated infrastructure and works in the townland of grousemount, kilgarvan, Co. Kerry. The proposed cable will facilitate the connection to the national grid of a proposed 11 turbine windfarm in co cork to the national grid via the previously permitted coomataggart substation (permitted by kerry county council under pl. Ref. No. 15/262). The proposed windfarm and remainder of the associated cable route is located in townlands of cloontycarthy, cleanrath north, cleanrath south, derrineanig, turnaspidogy, milmorane, coomlibane, rathgaskig, derragh, augeris, gorteenakilla, carrignadoura, gurteenowen, gurteenflugh,	Grant 03/06/2016

Application Reference	Description	Decision
	lyrenageeha and lackabaun in co cork. The planning application is accompanied by an Environmental Impact Statement (EIS) and a Natura Impact Statement (NIS). Grousemount, Kilgarvan, Co Kerry	
15/134	Develop an electrical transformer station consisting of three single-storey control buildings with associated outdoor electrical equipment, including transformers, lightning protection masts and scada poles, effluent holding tank, internal roads, boundary fencing around the perimeter of the complound, associated access track and all other associated site development works above and below ground. A 10 year planning permission is being applied for. The proposed development is an amendment to the previously approved electrical transformer station at grousemount wind farm (ref. 10/1333). Grousemount, Kilgarvan, Co. Kerry	Incomplete
15/262	Include 10 year planning permission for development. The development will comprise an electrical transformer station consisting of three single storey control buildings with associated outdoor electrical equipment, including transformers, lightning protection masts and scada poles, effluent holding tank, internal roads, boundary fencing around the perimeter of the compound, associated access track and all other associated site development works, above and below ground. The proposed development is an amendment to the previously approved electrical transformer station at Grousemount Windfarm (ref. No. 10/1333). Grousemount, Kilgarvan, Co Kerry	Grant 01/07/2015
Midas		
02/719	Construct a wind farm consisting of 6 no. Wind turbine generators, electrical substation, septic tank, percolation area, access roadways, buried cable ducts and a 50m anemometer mast EIS received. Foilgreana/Coolknoohil, Kilgarvan	Grant 04/12/2002
01/3571	Construct a wind farm (8 no. Turbines) EIS received. Coolknoohil	Grant 30/10/2002

Application Reference	Description	Decision
03/3665	To increase the hub heights of 7 wind turbines of planning reg no. 01/3571 from 49m to 60m hub height. Coolknoohill, The Coom, Co. Kerry	Grant 10/02/2004
Clydaghroe		
06/1680	Construct a wind farm, the development will consist of two wind turbines, two transformers, a control and metering building, a meteorological mast, site tracks and all associated works. Cummeennabuddoge And, Clydaghroe, Cloonkeen, Co Kerry	Grant 07/07/2006
10/1302	Construct a single turbine extension to an existing three turbine windfarm. The maximum hub height will be 68.3m and the maximum rotor diameter will be 82.4m resulting in a maximum tip height of 109.5. The associated works will include a turbine foundation, transformer and drainage, applying for 10 years. Clydaghroe, Clonkeen, Co Kerry	KCC – Refused 1st Party Appeal (PL08.238677). Grant conditional permission (21/07/2011)
Pl 08.238677	A ten year planning permission to construct a single turbine extension to an existing three turbine wind farm at Clydaghroe, Clonkeen, County Kerry. The maximum hub height will be 68.3 metres and the maximum rotor diameter will be 82.4 metres resulting in a maximum tip height of 109.5 metres. The associated works will include a turbine foundation, transformer and drainage.	Grant 21/07/2011
Cummeenabuddoge		
Pc08.311198	Wind farm of up to 19 wind turbines with a generation capacity of up to 114mw and all associated infrastructure. (pre-app meeting)	

Application Reference	Description	Decision
Scartglen		
13/114	Construct a wind farm including twelve (12) no. Wind turbines (with a maximum height of up to 126.5m), one (1) no. Permanent meteorological mast, (1) no. Substation, the provision of new and upgraded internal site service roads, underground cabling and all associated infrastructure. The proposed development would entail the construction of 12 no. Wind turbines which would be higher than the 12 no. Turbines previously granted planning permission on the site under planning register nos. 08/1675,08/2030, and 09/1284. A ten year planning permission is being sought to construct the development. An environmental impact statement and natura impact statement have been prepared in respect of this application. Barna, Scartaglen, Co Kerry	Grant 01/08/2013
13/725	Construct an extension to a permitted twelve turbine wind farm development (planning ref 13/114). The development will consist of six wind turbines (hub height up to 85m and maximum blade tip height of up to 126.5 m), upgrading of existing access roads, construction of additional access roads, further development of two existing borrow pits on the site and associated ancillary works. Development previously granted under Kerry County Council planning ref 13/114 will facilitate the proposed extension to the wind farm. Planning permission is being sought for a ten year period. An Environmental Impact Statement (EIS) and Natura Impact Statement (NIS) accompany the application. Barna and Knockrower East, Scartaglen, Co Kerry	Grant 02/05/2014

Cork

Table 2-5: Wind Farms within the 25km Radius of the Proposed Development – Cork County Administrative Area

Application Reference	Development	Decision
Cappaboy		
00/6590	Windfarm to include 10 no. turbines, 2 no. meteorological masts, substation with control building, site tracks, upgrading of site access & assoc. works.	Grant

Application Reference	Development	Decision
	Cappaboy Beg, Cappaboy Beg,	12/10/2001
03/6910	Modifications to a previously permitted 10 no. turbine windfarm to include increase in hub height from 47m to 65m, increase in blade tip height from 75m to 91m and the movement of a number of turbines to new locations. Cappaboy beg, Curraglass, Kealkil	Grant 27/10/2004
Curraglass		
20/350	A ten-year planning permission for a renewable energy development with a 30-year operational life (from the date of commissioning) and will consist of the following i. Up to 7 no. wind turbines with an overall blade tip height of up to 178.5 metres and all associated foundations and hard-standing areas; ii 2 no. borrow pits; iii 1 No. permanent meteorological mast with a maximum height of up to 112 metres; iv. Upgrade of existing and provision of new site access roads; v. Upgrade to existing access junction; vi. A 38kV electricity substation, including 4 no. battery storage containers, 1 no. control building with welfare facilities, associated electrical plant and equipment, security fencing, and waste water holding tank; vii. Forestry Felling; viii. A temporary construction compound; ix. Site Drainage; x. All associated internal underground cabling, including underground grid connection cabling to the existing overhead line; and xi. All associated site development and ancillary works. An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement have been prepared in relation to the proposed development and accompanies this planning application	Refused 26/08/2022 (Subject to first-party appeal ABP-308244-20)
ABP-308244-20	10-year planning permission for renewable energy development, consisting of 7 wind turbines.	Board's Decision quashed by Order of the High Court (Perfected on the 21/12/2022), New Case Number ABP-315656-23

Application Reference	Development	Decision
ABP-315656-23	10-year planning permission for renewable energy development, consisting of 7 wind turbines.	Awaiting decision (last checked 19/03/2023)
19/519	Retention of the existing electricity substation and associated facilities at Curraglass, and permission for the construction of an extension to the existing electricity substation, comprising up to 4 no. battery storage units, palisade fencing, bunded concrete plinths, associated electrical equipment, transformers and all ancillary site works. Curraglass, Kealkill, Co. Cork	Refused 27/11/2019
Coumaclovane		
06/8272	Erection of 1 no. wind turbine of 80m hub height and 90m diameter rotor blade and on site tracks, cabling and hard standing. Coumaclovane, Coolea	Refused 16/10/2006
06/8273	Erection of 1 no. wind turbine of 80m hub height and 90m diameter rotor blade, on site tracks, cabling and hardstanding. Coumaclovane, Coolea	Grant 16/10/2006
Knocknamork		
ABP-317406-23	Electrical Cabling with upgrades to roads etc, and all associated project development works. An NIS and EIAR accompany the application.	Case is due to be decided by 23/10/2023
19/4972	Renewable energy development consisting of the provision of a 7-turbine wind farm, solar photovoltaic array, electricity substation, battery storage compound and all associated works consisting of the following, i. Up to 7 wind turbines with an overall blade tip height of up to 150 metres and all associated foundations and hard-standing areas; ii. Up to 70,000sq.m solar photovoltaic array, with up to 17 associated inverters and 2 no. control cabins; iii. 1 no. borrow pit, iv. 1 No. permanent meteorological mast with a maximum height of up to 100 meters; v. Upgrade of existing and provision of new site access roads, vi. 1 no. 38kV electrical substation with 1 no. control building with welfare facilities, associated electrical plant and	Granted by CCC 18/11/2019

Application Reference	Development	Decision
	equipment security fencing and waste water holding tank; vii battery storage compound accommodating 4 no. battery storage containers, security fencing, and associated electrical plant and equipment, viii. Forestry felling ix. 1 no. temporary construction compound, x. Site drainage xi. All associated internal underground cabling; xii. 38kV underground grid connection cabling; xiii. All associated site development and ancillary works. The proposed development will have an operational life of 30 years from the date of commissioning of the development and the application seeks a ten year planning permission. An Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS) have been prepared in respect of the proposed development. Slievereagh and Coomnaclohy, Ballyvourney, Co. Cork	
22/5791	The development will consist of the provision of the following: (i) Underground electrical cabling (33kV); (ii) Access roads (new and upgrade of existing); (iii) Amendments to the permitted developments (Ref. No. 19/4972), including extension to the borrow pit and the omission of the 38kV electrical substation, 38kV underground cabling and battery storage compound; (iv) Site drainage; and (v) All associated site development ancillary works and apparatus. The development subject to this application forms part of grid connection and access arrangements which will facilitate the permitted Knocknamork Renewable Energy Development, Cork County Council Ref. No. 19/4972. Concurrent planning applications in relation to the overall grid connection and access arrangements will also be lodged to Kerry County Council and An Bord Pleanála. An operational period and extended planning permission duration to align with the permitted Knocknamork Renewable Energy Development, Cork County Council Ref. No. 19/4972 is sought. An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) have been prepared in respect of the proposed development and accompanies this application. The townlands of Slievereagh And Coomnaclohy, Ballyvourney, Co Cork	Granted by CCC 15/05/2023
22/816	(I) underground electrical cabling (33kv), (ii) upgrade of access junctions; (iii) access roads (new and upgrade of existing); (iv) temporary access road; (v) borrow pit; (vi) site drainage; (vii) forestry felling; and (viii) all associated site development ancillary works and apparatus. The development subject to this application forms part of grid connection and access arrangements which will facilitate the permitted Knocknamork renewable energy development, cork county council ref. No. 19/4972. Concurrent planning applications in relation to the overall grid connection and access arrangements will also be lodged to cork county council and An Bord Pleanála. An operational period and extended planning permission duration to align with the permitted Knocknamork renewable energy development, cork county council ref. No. 19/4972 is sought. An environmental impact assessment report (EIAR) and natura impact statement (NIS) have been prepared in respect of the proposed development and accompanies this application.	Refused by KCC 24/05/2023 (Subject to first party appeal ABP-317406-23)
23/4455	Alterations to the dimensions of the 7 no. wind turbines permitted as part of the Knocknamork Renewable Energy development (planning reference 19/4972). The proposed development includes the provision of 7 no. wind turbines with	Granted by CCC 16/06/2023

Application Reference	Development	Decision
	an overall ground to blade tip height of 175m (an increase of 25m, from 150m), a rotor blade length of 75m and a hub height of 100m, and all associated site development and ancillary works, an operational period and planning permission duration to align with the existing permission (planning reference no. 19/4972) is sought. An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) have been prepared in respect of the proposed development and accompany this application	
Bawnmore		
01/6529	Wind farm to include 7 no. turbines, substation and site tracks. Cahernafulla, , Cahernafulla, , Kilberrihert,	Granted by CCC 13/03/2003
08/6149	Completion of wind farm to include 7 No. turbines, substation and site tracks granted under CCC Reg. Ref. 01/6529. Cahernafulla, Kilberrihert, Aghabullogue	Granted by CCC 09/06/2008
08/8770	An increase in hub height from 60 to 85 metres and rotor blade diameter from 66 to 82 metres as well as the addition of 1no. wind turbine to the permitted wind farm development at Cahernafulla. Associated changes to include relocation of permitted turbines, relocation of permitted substation & access tracks, and increase in site area to provide for new access road and entrance. Cahernafulla, Kilberrihert, Aghabullogue	Granted by CCC 08/12/2008
11/4832	Retention of minor alterations, realignment to the internal roads and widening of the existing site entrance for accessing the wind farm which was granted planning permission under Pl. Reg. No. 08/8770.	Granted by CCC 27/05/2011
Gortyrahilly Wind Farm – Proposed		
ABP Ref No.313440	Construction of 14 wind turbines, grid connection and all associated works. Lodged with ABP 28/04/2022.	Pending Decision from ABP
Carrigrierk Extension - Proposed		

Application Reference	Development	Decision
21/5372	The proposed development includes the provision of: 1. Up to 3 no. wind turbines with a maximum overall ground to blade tip height of up to 176.5 metres along with the associated foundations and hard-standing areas, serviced/accessed via the existing Carrigarierk Wind Farm infrastructure, permitted under An Bord Pleanála Planning References 04.246353 and 301563-18 (Cork County Council Planning References 15/730 and 17/431); 2. An operational life of the proposed development aligned with that of the existing Carrigarierk Wind Farm (25 years from 2021); 3. Underground electrical (33kV) and communication cabling connecting the proposed turbines to the existing 110kV substation in the townland of Carrigdangan; 4. Upgrade of existing tracks and provision of new site access roads and hardstand areas; 5. 1 no. borrow pit; 6. A temporary construction compound; 7. Forestry felling; 8. Operational stage site signage; 9. Site drainage; and, 10. All associated site development works and apparatus. The application is accompanied by a Natura Impact Statement and Environmental Impact Assessment Report. The townlands of Derryleigh, Gortnahoughtee, Cloghar, Gurteen, Gortatanvally, Lackabaun and Carrigdangan, Co. Cork	Granted by CCC 21/03/2022. Appealed to An Bord Pleanála (ABP Ref No.313261) Decision Due 10/08/2022.
Kealkill		
03/6910	Modifications to a previously permitted 10 no. turbine windfarm to include increase in hub height from 47m to 65m, increase in blade tip height from 75m to 91m and the movement of a number of turbines to new locations. Cappaboy beg, Curraglass, Kealkil	Grant 27/10/2004
Coomacheo		
03/1997	Windfarm to include 17 no. turbines, 60m meteorological mast,120KV substation, control building, fencing, compound & anc. Works. Coomacheo, Coomacheo,	Grant 25/07/2003
06/10251	Alterations to 110Kv substation compound to serve permitted windfarm development of 17 no. windturbines to include increase in size of substation compound and alterations to layout, increase in size of control building and installation of septic tank. Coomacheo, Millstreet	Grant 19/10/2006

Application Reference	Development	Decision
Curragh		
07/10105	Windfarm development comprising of 8 no. wind turbines, substation, meteorological mast, associated access roads, borrow pit and associated works. Curragh, Drishane, Millstreet	Grant 21/07/2008
Caherdowney		
03/3079	Windfarm to include 4 no. turbines, meteorological mast, transformers,38kv substation, control building, site tracks and associated works. Caherdowney, , Caherdowney,	Grant 25/09/2003
Gneeves		
99/616	15.6 MW windfarm to incl. 13 turbines, 45m high measuring mast, control building, hard standing areas, compound, access roads, signs & anc. site works. Gneeves, Gneeves,	Grant 08/04/1999
03/6585	Modifications to windfarm permitted under Reg. No. N/99/0616 to include increase of the turbine height from 44m to 65m. Gneeves, Millstreet	Grant 20/02/2004
04/188	Extension to windfarm permitted under reg. no. N/99/0616 to consist of 4 no. wind turbines (hub height 65m, blade tip 91m), construction of and extension of internal site tracks and associated works. Gneeves Millstreet	Grant 09/07/2004
Lacka Cross		

Application Reference	Development	Decision
06/12438	Construction of 2 no. wind turbines up to 85m hub height and up to 80m blade diameter, 2 no. transformers, site tracks and associated works. Lacka Cross, Lackanastooka, Ballydesmond	Grant 02/05/2007
Derreenacrinnig West		
ABP-305609-19	Dreenacrinning West Windfarm grid connection.	Annulled 09/06/2020
ABP-305790-19	Installation of approx. 3.2km of underground cable ducting and associated electrical cabling, 1.2km of overhead line supported on wood polesets, and all other ancillary works including joint bays, culverts, marker posts and all associated developments.	Annulled 09/06/2020
ABP-315059-22	Removal of existing Electricity supply grid and replacement with similar, and all associated works. An Environmental Impact Assessment Report (EIAR) was received with this application.	Awaiting decision (last checked 29/09/2023)
10/857	Development to comprise of seven (7) electricity generating wind turbines with a hub height of 55 metres and a rotor diameter of 52 metres, an Electrical Compound, Sub-Station Building, Four Car Parking Spaces, associated site roads and site works; it is proposed to source stone from an on site borrow pit. Derreenacrinnig West, Drimoleague, Co. Cork	Grant 03/10/2011 (Appealed) 05/12/2012
19/10	The installation of approximately 3.2km of underground cable ducting and associated electrical cabling, approximately 1.2km of overhead line supported on wood polesets, and all other ancillary works including joint bays, culverts, marker posts and all associated developments. The works, which will take place at six separate locations along the 14km grid	Grant 30/09/2019

Application Reference	Development	Decision
	connection route, are required to complete the grid connection from Derreenacrinnig West Windfarm to the ESB Ballylickey substation. An Environmental Impact Assessment Report (EIAR) has been prepared and will be submitted to the authority with the application. Advisory Note: The full extent of the grid connection is approximately 14km the remaining 9.6km has already been installed and is the submect of an application for leave to apply for substitute consent to An Bord Pleanála Reference 302837-18	Subject to Third-Party Appeal (ABP-305790-19)
21/737	Development will consist of; The application will seek permission to remove the existing grid connection works and for the development of the full length of a new grid connection over a distance of approximately 14.8km, between the existing Ballylicky ESB substation and the permitted Derreenacrinnig West Windfarm. The proposed development involves the following works: (a) removal of approximately 9.5 km of 20 kV overhead line (OHL) along the route, the OHL to be removed consists of 138 wood poles (ranging from 9m to 12.5m above ground), supporting electrical conductor lines and ancillary structures and equipment (b) following removal of the OHL, it is proposed to construct approximately 10.8 km of 20 kV overhead line (OHL) along the route, the OHL to be constructed consists of c. 157 wood poles (ranging from 9m to 12.5m above ground), supporting electrical conductor lines and ancillary structures and equipment. (c) installation of approximately 4 km of underground cable ducting and associated electrical cabling, and all other ancillary works including joint bays, culverts, marker posts and all associated developments. An Environmental Impact Assessment Report (EIAR) has been prepared and will be submitted to the planning authority with the application.	Grant 18/10/2022 Subject to third-party appeal (ABP-315059-22)
22/153	Development of a wind farm comprising of seven (7) number electricity generating wind turbines with a hub height of 55 metres and a rotor diameter of 52 metres, an electrical compound, sub-station building, four number car park spaces, associated site roads and site works. Derreenacrinnig West, Drimoleague, Co. Cork	Granted 03/05/2022
Inchamore		
KCC: 23/646 **CCC: 23/5145**	We, Inchamore Wind Designated Activity Company, intend to apply for permission for a ten-year planning permission for a renewable energy development. The entirety of the renewable energy development constitutes the provision of a five-turbine wind farm and all associated works on land in both Counties Cork and Kerry. The development for will consist of : 1) a wind farm with an operational lifespan of 35 years (from date of commissioning of the development), 2)	Awaiting Decision from KCC and CCC

Application Reference	Development	Decision
	the construction of five turbines with an overall ground to blade tip height ranging from 177m to 185m inclusive; a rotor diameter ranging of 149m to 155m inclusive; and a hub height ranging from 102.5m to 110.5m inclusive, 3)construction of permanent turbine hardstands and turbine foundations, 4) Construction of one temporary construction compound with associated temporary site offices, parking areas and security fencing. 5) installation of a (35-year life cycle) meteorological mast with a height of 110m and a 4m lightning pole on top, such that the overall structure will be 114m, 6) development of an on-site borrow pit, 7) construction of a new permanent internal site access roads to include passing bays and all associated drainage infrastructure. 8) development of a permanent internal site drainage network and sediment control systems. 9) construction of a permanent 38 kV electrical substation including a control building with welfare facilities, all associated electrical plant and equipment, parking security fencing and gates, all associated underground cabling, wastewater holding tank, and all ancillary structures and works, 10) all associated underground electrical and communications cabling connecting the wind turbines to the on-site wind farm substation, 11) ancillary forestry felling to facilitate construction of the development, 12) all associated site development works including berms, landscaping, and soil excavation. Advisory note: A planning application is being lodged with Kerry County Council in relation to the elements of the project that are within the townland of Derryreag (Dhoire Aimhréidh) Co.Kerry, including the upgrade of the site entrance off the N22 and permanent forest track upgrade works. The planning application will be accompanied by an Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS). Tá sé beartaithe againne, inchamore Wind Cuideachta Ghníomhaíochta Ainmnithe, iarratas adhéanamh ar Chead maidir le cead pleanála deich mbliana d'fhorbair. Inchnamore / na hInse Móire, Milleeny / na Millíní, Derreenaling / an Doirín Álainn, Co.Cork /Co.Chorcaí	
Gortloughra		
PC04.311299	Construction of 9 wind turbines of approximately 6 megawatts each with a combined output of approximately 54 megawatts. (Pre-app meeting)	Consultation has yet to be concluded
Ballinagree		

Application Reference	Development	Decision
ABP-312606-22	Wind farm development of 20 turbines with 110kV electrical substation and all related site works and ancillary development.	Requires Further Consideration
PC04.306948	The construction of up to 24 wind turbines, 110kV on-site substation and associated connection to the national grid. (Pre-app meeting)	SID Date signed: 19/08/2021
Shehymore		
13/551	Ten year permission sought to construct a windfarm and all associated infrastructure. The proposed windfarm will comprise the provision of a total of 12 no. wind turbines, with a maximum overall blade tip height of up to 131m, upgrading of existing and provision of new internal access roads, provision of a wind anemometry mast (height up to 90m), 4 no. borrow pits, underground electricity connection cabling, upgrading of site access junctions an electricity sub-station with control room and associated equipment, temporary construction compound and all ancillary site and ground works. The Planning Application is accompanied by an Environmental Impact Statement (EIS) and a Natura Impact Statement (NIS). Cloghboola, Gortnacarriga,, Tooreenalour,, Garryantorna, Shehy More,, Dunmanway, Co. Cork	Grant 21/05/2014 (Appealed)
PL04.243486	Ten year permission to construct wind farm consisting of 12 wind turbines and all ancillary site works. Cloghboola, Gortnacarriga, Tooreenalour, Garryantorna, Shehy More,	Grant 23/12/2016

2.6 Scoping and Consultations

2.6.1 Scoping

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

A scoping report, providing details of the application site and the Proposed Development, was prepared by MKO and circulated in July 2022. In November 2022 a round of reminders were sent to all consultees who had not yet responded. MKO requested the comments of the relevant personnel/bodies in their respective capacities as consultees with regards to the scope and preparation of the EIAR.

2.6.2 Scoping Responses

Table 2-6 lists the responses received to the scoping document circulated. Telecommunications operators were scoped at an earlier stage for the purposes of constraints mapping. Copies of all scoping responses received as of August 2023 are included in **Appendix 2-3** of this EIAR. The recommendations of the consultees have informed the scope of the assessments undertaken and the contents of the EIAR. Those bodies engaged with at scoping stage are set out below in **Table 2-6**.

Table 2-6: Scoping Responses

Ref	Consultee	Date of Response
1	An Taisce	No Response
2	Bat Conservation Ireland	09/11/2022
3	Birdwatch Ireland	No Response
4	Broadcasting Authority of Ireland	03/08/2022
5	Commission for Regulation of Utilities, Water and Energy	No Response
6	Cork County Council – Environment Department	No Response
7	Cork County Council – Heritage Department	No Response
8	Cork County Council – Roads Department	05/08/2022
9	Department of Agriculture, Food and the Marine	03/08/2022

Ref	Consultee	Date of Response
10	Department of Communications, Climate Action and the Environment	No Response
11	Department of Defence	09/08/2022
12	Department of Housing, Local Government and Heritage	12/10/2022
13	Department of Transport, Tourism and Sport	04/08/2022
14	Eirgrid	No Response
15	Fáilte Ireland	29/07/2022
16	Forest Service	No Response
17	Geological Survey of Ireland	07/09/2022
18	Health Service Executive	28/09/2022
19	Iarnród Eireann	No Response
20	Inland Fisheries Ireland	15/09/2022
21	Irish Aviation Authority	No Response
22	Irish Peatland Conservation Council	No Response
23	Irish Red Grouse Association	No Response
24	Irish Raptor Study Group	No Response
25	Irish Sports Council	No Response
26	Irish Water	No Response
27	Irish Wildlife Trust	09/11/2022
28	Kerry County Council – Environment Department	14/11/2022
29	Kerry County Council – Heritage Department	No Response
30	Kerry County Council – Roads Department	22/07/2022
31	Kerry Airport Plc	14/11/2022
32	Office of Public Works	No Response
33	Sustainable Energy Authority of Ireland	26/07/2022
34	SW LAWPRO	09/11/2022
3	The Heritage Council	No Response

Ref	Consultee	Date of Response
36	Transport Infrastructure Ireland	15/11/2022
37	Waterways Ireland	No Response

Table 2-7 sets out the detail of Telecoms consultation responses received. The responses received were fully considered and issues raised where followed up through contact with the respondent where clarification was necessary and addressed throughout the EIAR.

Table 2-7: Telecoms Consultation Response Details

Ref	Consultee	Date of Response
1	2rn (RTÉ Transmission Network)	17/02/2022
2	Ajisko Ltd/ iMedia	28/03/2022
3	Broadcasting Authority of Ireland	16/02/2022
4	BT Communications Ireland	29/03/2022
5	ComReg (Commission for Communications Regulation)	18/02/2022
6	Eir	25/02/2022
7	Eircom	No Response
8	Enet	17/02/2022
9	ESB Telecoms	21/03/2022
10	Irish Aviation Authority (IAA)	No Response
11	Imagine Group	16/02/2022
12	Ivertec Ltd.	28/03/2022
13	Kerry Airport	14/11/2022
14	Meteor Mobile Communications Ltd.	21/02/2022
15	Ripple Communications Ltd.	No Response
16	Tetra Ireland Communications	28/02/2022
17	Three Ireland Ltd	17/10/2022
18	Towercom	No Response
19	Viatel Ireland Ltd.	No Response
20	Virgin Media Ltd.	28/03/2022
21	Vodafone Ireland Ltd.	29/02/2022

2.6.3 Other Consultations

2.6.3.1 Community Engagement

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

The Proposed Development has the potential to have significant benefits on the local economy, by means of job creation, landowner payments and commercial rate payments. An important part of any renewable energy development, which Ørsted has been at the forefront of developing, is its Community Benefit Package. The concept of directing benefits for wind farms to the local community is promoted by the National Economic and Social Council (NESC) and Wind Energy Ireland (WEI) among others. While it may be simpler and easier to put a total fund aside for a wider community area,

Orsted is endeavouring to develop new ways to direct increased gains towards the local community with particular focus on those living closest to the Proposed Development.

The Wind Energy Development Guidelines (2006) (the Guidelines) state that:

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

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

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

The Draft Revised Wind Energy Guidelines (Department of Housing, Planning and Local Government, 2019) (the draft Guidelines) has retained this position stating the following:

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

This report outlines the consultation and community engagement initiatives undertaken by Ørsted prior to the submission of the planning application. It also outlines, the main issues identified during this process, how the final proposal reflects the community consultation and the steps taken to ensure that the Proposed Development will be of enduring economic benefit to the communities concerned.

The Proposed Development will provide an enduring economic benefit to the communities surrounding the Proposed Development as outlined in Chapter 2 of the EIAR, through the community benefit package for residents and community groups, employment during the construction and operation of the Proposed Development and through the annual rates payable to the local authority.

2.6.4 Pre-Planning Meetings

2.6.4.1 An Bord Pleanála

The prospective Applicant engaged with An Board Pleanála under the provisions Section 37B and 182E of the Planning and Development Act 2000 (as amended), as to whether the proposed wind farm element of the Proposed Development and, separately, the substation upgrade element of the Proposed Development would be considered Strategic Infrastructure Development (SID).

As two separate requests were issued to ABP under the provisions of both Section 37B and 182E of the Act, the Board issued two separate meeting requests under references ABP 314799-22 and 314798-22. However, as agreed with the prospective Applicant, a single meeting was held to discuss both cases, acknowledging the interrelationship that exists.

The opening SID meeting was held with the Board on the 7th of December 2022. Those in attendance were:

- Ciara Kellett, Assistant Director of Planning (Chair).
- Mairead Kenny, Planning Inspectorate.

- Doina Chiforescu, An Bord Pleanála.
- Patrick McMorrough, Ørsted.
- Órla Murphy, MKO.
- Áine Bourke, MKO.
- Niamh McHugh, MKO.
- Martin Molloy, MKO.

The design team gave an overview of the Proposed Development - both wind farm site and substation upgrades – in the form of a PowerPoint presentation. The presentation included:

- EU, National and local Policy Context
- Project Context
- Proposed development
- Scoping, pre-application consultation and public consultation
- EIAR
- Landscape Photomontages
- Project Timeline

The prospective Applicant stated its opinion that the proposed wind farm site would comprise Strategic Infrastructure Development in the meaning of the Act, while the substation upgrades would not comprise Strategic Infrastructure Development in the meaning of the Act but could be included as part of a single application with the proposed Wind Farm. Discussion followed the PowerPoint presentation and included:

- The proposed substation upgrade works and rationale,
- Location of the existing grid connection underground electrical cabling route which will not be upgraded and will remain in place under its existing permission,
- A single EIAR will be prepared to cover both planning applications
- Single Submission under Section 37E of the Act versus dual application approach
- Stage 2 Appropriate Assessment
- Timelines to submission of planning application

The prospective Applicant requested to close both consultations with An Bord Pleanála under Section 37E and 182E of the Planning and Development Act 2000 (as amended) on 14th August 2023 and 22nd May 2023 respectively. On 22nd May 2023 the Board wrote to the prospective Applicant and confirmed that the S182-A consultation was closed and the proposed substation upgrade works would not be considered Strategic Infrastructure Development as defined in the Act.

Separately, on 14th August 2023 the Board wrote to the prospective Applicant and confirmed that the S37B consultation was now closed and that the Wind Farm was considered to be Strategic Infrastructure Development within the meaning of Section 37A of the Act, including that the substation upgrade works could be included as part of this application under Section 37A rather than as a standalone application to the Local Planning Authority. As such any application for approval of the wind farm site and substation upgrades will be made directly to An Bord Pleanála.

2.6.4.2 Kerry County Council

Members of the team and the prospective applicant met with representatives from Kerry County Council on the 1st March 2023. Those in attendance were:

- Mike Lynch, KCC
- Cathy Fisher, KCC
- Mike Boyce, KCC
- Mike Connolly. KCC
- Patrick McMorrough, Ørsted.
- Órla Murphy, MKO.

- Áine Bourke, MKO.
- Niamh McHugh, MKO.
- Martin Molloy, MKO.

The team gave an overview of the Proposed Development in the form of a PowerPoint presentation which discussed:

- EU, National and Local Planning Policy Context
- Project Context – Site Selection and Location, Site Constraints
- Proposed Development
- Scoping, Pre-Application Consultation & Public Consultation
- Environmental Impact Assessment Report
- Landscape and Photomontages
- Project Timeline

Following the presentation further discussion included the following items:

- First case of repowering within Kerry – The local authority noted that
- Repowering EU Policy – It was queried by MKO whether the 6 month timeline for a decision on application will be applied as per the Repowering EU policy.
- Decommissioning existing windfarm - Some of the existing wind turbines have a 20-years planning permission which will expire in the next few years. Proposed wind turbines will be more efficient that the existing turbines.
- Length of permission required – A 10 year planning permission is to be requested by the perspective applicant was clarified.
- Mitigation of effects on White Tailed Eagle
- Climate Lifecycle Assessment
- Discharging Conditions on current permissions – MKO & Ørsted confirmed that the outstanding conditions will be discharged on the application prior to the lodgement of the repowering application.

2.6.4.3 Cork County Council

A pre-planning meeting was requested with Cork County Council on 19th October 2022 in respect of the works to the access road which were proposed at the time. The Planning Authority provided formal written feedback in respect of the Proposed Development on 23rd November 2022 following their determination that a formal meeting was not required. No pre-planning meeting was held with the Cork County Council Planning Authority in respect of this Proposed Development.

Please note that these works are no longer proposed, and no works are proposed within the administrative boundary of County Cork. This was confirmed to the Planning Authority on 14th April 2023.

2.7 Cumulative Impact Assessment

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

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

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

2.7.1 Methodology for the Cumulative Assessment of Projects

The potential cumulative impact of the Proposed Development and combined with the potential impact of other projects or plans has been carried out with the purpose of identifying what influence the Proposed Development will have on the surrounding environment when considered collectively with approved and existing projects, projects pending a decision from the planning authority, projects in the public domain such as those Strategic Infrastructure Development (SID) at pre-consultation with An Bord Pleanála, and land-uses in the vicinity of the Proposed Development site location.

The cumulative impact assessment of projects has three principle aims:

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

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

2.7.2 Cumulative Study Area

The geographical boundaries of the various zones of sensitivity of and to the Proposed Development from which there may be potential for cumulative impacts to arise relative to each individual EIAR topic, i.e each chapter, is presented below in **Table 2-8**. Following consultation with the EIAR team on each individual topic, the maximum geographical extent and justification for this extent was established and is presented below.

Table 2-8 Cumulative Study Area

Individual Topic	Maximum Extent	Justification
Human Beings	4 local DEDs	All infrastructure associated with the Proposed Development is located within the 4 no. DEDs included within the Study Area
Terrestrial Biodiversity	15km from EIAR Site Boundary.	Projects of a large scale have been examined out to 15km, while more detail was captured on projects within 10km and a complete discussion of all projects within 5km of the Proposed Development

Individual Topic	Maximum Extent	Justification
Birds	15km buffer from proposed turbines	Projects of a large scale have been examined out to 15km, while more detail was captured on projects within 10km and a complete discussion of all projects within 5km of the Proposed Development
Aquatic Biodiversity	Roughty River Catchment	This assessment is based on flow volumes obtained from the EPA Hydrotool Nodes in the vicinity and downstream of the site. The assessment concludes that due to dilution no hydrological cumulative effects will occur beyond EPA Hydrotool Node 21_6757. For the sake of being conservative, the cumulative assessment area extends further downstream than Hydrotool Node 21_6757 in the Roughty River Catchment
Land, Soils and Geology	EIAR Site Boundary	As there is no pathway for offsite cumulative impacts for Land, Soils and Geology, the cumulative study area is the EIAR Site Boundary
Water	Roughty River Catchment	This assessment is based on flow volumes obtained from the EPA Hydrotool Nodes in the vicinity and downstream of the site. The assessment concludes that due to dilution no hydrological cumulative effects will occur beyond EPA Hydrotool Node 21_6757. For the sake of being conservative, the cumulative assessment area extends further downstream than Hydrotool Node 21_6757 in the Roughty River Catchment
Air & Climate	Air Quality Study Area is 1km from EIAR Site Boundary. The Climate assessment has been considered on a national basis and not confined to a specific study area.	Given dust particles do not generally travel greater than 500m from source (*Guidance on the Assessment of Mineral Dust Impacts for Planning*, IAQM 2016) the geographical boundary for the cumulative dust impact is 500m. In line with the TII Publication Air Quality Assessment of Proposed National Roads – Standard PE-ENV-01107, December 2022, a geographical boundary of 1km was used for cumulative air quality assessment. The Climate assessment has considered the cumulative effects of the Proposed

Individual Topic	Maximum Extent	Justification
		Developments with other developments on a national basis.
Noise & Vibration	The list of wind farms which were initially considered in cumulative assessment extended to 10 km.	The geographical boundary for the cumulative noise assessment is the area within which noise levels from the proposed, consented and existing wind turbine(s) may exceed 35 dB LA90 at up to 10 m/s wind speed (Institute of Acoustics document *Good Practice Guide To The Application Of Etsu-R-97 For The Assessment And Rating Of Wind Turbine Noise*).
Cultural Heritage	UNESCO World Heritage Sites (including tentative sites): 20 km National Monuments: 10km Sites and Monuments (State Ownership and Preservation Order Sites): 5km NIAH Structures: 5km Undesignated Sites, if relevant: 500m	The visual impact Wind Farms out to 20km from the Proposed Development, and any project just outside the buffer which is deemed important.
Landscape & Visual	25km from proposed turbines for visual and landscape effects.	The Wind Energy Development Guidelines (DoEHLG, 2006) ('the Guidelines') require that *"In areas where landscapes of national or international renown are located within 25km of a proposed wind energy development, the Zone of Theoretical Visibility should be extended as far (and in the direction of) that landscape"*. Killarney National Park was awarded UNESCO Biosphere Reserve status and therefore is deemed to be a landscape of national and international renown. Consequently, the LVIA study area has been chosen as 25km from the proposed turbines to account for the landscape and visual effects of the Proposed Development from the National Park at Killarney

Individual Topic	Maximum Extent	Justification
Material Assets: Traffic & Transport	Buffer of 5km for wind farms and other large developments i.e. road projects, quarry projects, factories, solar farms, largescale infrastructure etc	Informed by traffic modelling scenario and the area of influence the Proposed Development has on changing traffic volumes. The potential cumulative traffic effects with the Proposed Development are assessed on the following criteria; › Project status (proposed to operational) › Degree of overlap with the Proposed Development delivery highway network (low to high) › Traffic volumes (low to high) The geographical boundary for the traffic & transport cumulative assessment is defined by the potential for other projects to overlap with the Proposed Development delivery highway network, and so a 5km buffer from the EIAR site boundary is deemed appropriate to capture other plans and projects with the potential for cumulative effects with the Proposed Development. Please refer to Chapter 15 Material Assets for further details on the cumulative assessment methodology.
Material Assets: Telecoms & Aviation	The list of wind farms and other projects which were initially considered in cumulative assessment extended to 25 km.	The geographical boundary for the telecoms cumulative assessment is defined by the potential for other wind farm projects to interfere with broadcast signals that interact with the Proposed Development.

To gather a comprehensive view of cumulative impacts within the cumulative study area and to inform the EIA process being undertaken by the consenting authority, each relevant chapter within the EIAR addresses the potential for cumulative effects where appropriate and within the context of their identified cumulative study area. A long list of all applications considered by each of the different disciplines in their cumulative impact assessment are included in **Appendix 2-4.**

2.7.2.1 Summary

The cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider all potential significant cumulative effects arising from relevant projects and land uses within the cumulative study area and within the vicinity of the Proposed Development. These include ongoing agricultural practices.

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

2.8 Conclusion

As indicated above there is ample opportunity at all levels of policy to endorse the proposed repowering development. The land is appropriately zoned to support the establishment of a repowering wind farm. Upgrading existing wind farms aligns with extensive support within local, regional, national, and international policies aimed at bolstering renewable energy generation capacity in Ireland. Elevating renewable energy generation is pivotal in reaching the renewable energy targets outlined in this proposal. We respectfully urge the Board to consider repowering an existing wind farm as the most environmentally friendly approach to achieve these objectives.

A comprehensive evaluation of potential impacts has been conducted across all pertinent aspects of the subject site, as detailed in Table 2-8 of this chapter. To gain a comprehensive understanding of cumulative impacts within the study area and to inform the Environmental Impact Assessment (EIA) process overseen by the consenting authority, each relevant chapter within the Environmental Impact Assessment Report (EIAR) addresses the potential for cumulative effects when applicable and within the context of their respective cumulative study areas.